



April 7, 2015

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-15-0002

RE: Crops Subcommittee – 2016 Sunset Proposals

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board on its 2016 Sunset Review process and the summaries posted for the spring 2015 meeting.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

OTA thanks NOSB for carefully considering each handling input scheduled to sunset in 2016. It's critical that NOSB hear from certified crop producers on whether these inputs are consistent with and essential to organic production and handling, or whether there are other natural or organic alternatives available.

To help facilitate a thorough comment and review process, OTA created an electronic survey for each input under review for 2016 and 2017. The surveys are user-friendly, available to **every NOP certificate holder**, and include 7-10 questions addressing the essentiality of the National List input under review. The name of the companies submitting the information is confidential (not disclosed to OTA). The goal is to collect information for NOSB to consider at the first stage of the two-step process to shape its recommendation, and again prior to the vote at the second meeting. The information collected will help OTA identify the inputs that should be **renewed or removed** from the National List, and ultimately shape its comments to NOSB.

Materials that have been placed onto the National List for use in organic crop production should remain on the National List if: 1) they are consistent with organic farming; 2) they are still necessary to the production of the agricultural product because of the unavailability of wholly natural substitute products with organic production; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517] National List). Furthermore, decisions must be transparent, non-arbitrary, and based on the best current information and the interests of the organic sector and public at-large.

We have summarized the results of the 2016 Sunset Surveys for the two crop production substances up for review and voting at the upcoming Spring 2015 meeting for NOSB consideration:

- Ferric Phosphate
 - *Summary of survey responses:* OTA received survey responses from organic farmers representing 633 acres of certified organic ground in the West and Northeast. These farms ranged in size from 1.4 acres to over 400 acres. Crops produced by these farmers include mixed vegetables and herbs and tree fruit. Almost all respondents rated ferric phosphate as “critically essential” to their operations, and **all** respondents indicated that there were no effective alternative products for slug and snail control for commercial scale production.
- Hydrogen Chloride
 - *Summary of survey responses:* OTA received survey responses from members of the Texas Organic Cotton Marketing Cooperative who cumulatively produced over 20,000 acres of organic cotton in West Texas. All respondents indicated that hydrogen chloride is “critically essential” to organic cotton production because, without delinting cotton seed, it is not possible to plant using a mechanical seeder. Research into non-chemical delinting processes at USDA-ARS in Lubbock, TX, shows promise, but no commercial-scale mechanical delinting equipment has been manufactured or made available to the industry. Hydrogen chloride remains the only option for delinting cottonseed for the entire cotton industry (both organic and conventional).

In closing, we thank the Board for its time and commitment. OTA is committed to collecting information from our broad membership and beyond in order to assist NOSB in determining whether or not a substance on the National List remains essential to organic crop production

Again, on behalf of our members across the supply chain and the country, OTA thanks NOSB for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



Nathaniel Lewis
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Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association