



April 4, 2019

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-18-0071

RE: Crops Subcommittee – 2021 Sunset Reviews

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2021 Sunset Review.

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 over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA thanks NOSB for carefully considering each crop production material scheduled for review as part of the 2021 Sunset Review cycle. Materials placed on 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 in 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 in the interest of the organic sector and public at-large. It's critical that NOSB hear from certified farmers on whether these inputs are consistent with and necessary for organic production, or whether there are other effective natural or organic alternatives available.

About OTA Sunset Surveys

OTA is submitting results to our Sunset Surveys created for each input under review as part of the 2021 Sunset Review cycle. These electronic surveys include about 10 questions addressing the **necessity (crop and livestock)** or **essentiality (handling)** of each input. See Appendix A for a sample survey. Our surveys do not address information regarding the impacts on human health or the environment.

The surveys are open to any NOP certified organic operation. The names of the companies submitting the information are confidential (not disclosed to OTA). To ensure wide distribution of the surveys beyond OTA membership, OTA worked with Accredited Certifying Agencies (ACAs) and the Organic Materials Review Institute (OMRI) to distribute the survey to all of their clients as well as to targeted clients they

know are using the inputs under review. OTA also worked through its Farmers Advisory Council¹ to help assist in distribution to NOP certified farmers.

Results of OTA Sunset Surveys

OTA has received **5** responses on our 2021 Crops Sunset Surveys. Below is a summary of the feedback received via OTA’s Sunset Surveys to date.

§205.601 – Synthetic substances allowed for use in organic crop production.

Substance	# of responses	Summary of responses	Average rating of Necessity (from 1 to 5, with 1 being “unnecessary” and 5 being “critical /would leave organic without it”)
Hydrogen peroxide	1	<p>The material is necessary because:</p> <ul style="list-style-type: none"> - Used as a post-harvest sanitizer for citrus as part of a food safety protocol and leaves no residues on the fruit - Used for controlling sweet orange scab and greasy spot in citrus - Used for controlling purple blotch in onions <p>Alternative are not sufficient because:</p> <ul style="list-style-type: none"> - Not as effective - Not as safe - Leaves undesirable residues - Undesirable cumulative build up in the soils <p>If the material were prohibited:</p> <ul style="list-style-type: none"> - Economic effect on the cost of operation 	5
Ammonium soaps	0		
Horticultural oils	2	<p>The material is necessary because:</p> <ul style="list-style-type: none"> - In organic banana production, it is used to control black sigatoka, a leaf fungus that is the most severe disease in banana production - Use to control many other pests and disease in organic production such as: to control overwintering codling moth, leaf rollers, apple scab, powdery mildew, wooly apple aphid <p>Alternative are not sufficient because:</p> <ul style="list-style-type: none"> - Natural plant oils are not as effective - Management practices such as leaf surgery that helps reduce the pressure from the disease but must be implemented in conjunction with the use of horticultural oils. <p>If the material were prohibited:</p> <ul style="list-style-type: none"> - Reduction in banana yields by over 50% which could eventually leads to abandonment of organic farming activities altogether. - Difficulty controlling most pests and diseases in other crops 	5

¹ OTA’s Farmers Advisory Council was established in 2013 to formalize two-way communication between OTA and member producers as well as regional organic producer organizations across the United States. Through dialog and input, FAC gives organic farmers a voice to directly influence OTA’s policy and provides an avenue for OTA to share information and advocacy work with this stakeholder group.

Pheromones	0		
Ferric phosphate	0		
Potassium bicarbonate	0		
Magnesium sulfate	0		
Hydrogen chloride	2	<p>The material is necessary because:</p> <ul style="list-style-type: none"> - Used by all U.S. organic cotton farmers for removing the lint from the cotton seed (delinting) in order to be usable in modern mechanical planting equipment. The small fibers have to be removed from the seed so that it will flow through the hopper box in the planter. <ul style="list-style-type: none"> o Used only once per year (at planting). o Only planting seed is treated with HCl---no animal feed products are delinted. o The acid is neutralized at the delinting facility with calcium carbonate and thus none of it ever enters the soil on an organic farm. <p>Alternative are not sufficient because:</p> <ul style="list-style-type: none"> - There are no commercially available, effective, natural alternatives for delinting cotton planting seed that work on a consistent basis. - A mechanical delinting process is under development but it has not been perfected and is not in commercial use. - Undelinted seed could be planted by hand. However, that is not an economically viable option in the U.S. <p>If the material were prohibited:</p> <ul style="list-style-type: none"> - If it is not allowed for delinting purposes, the U.S. organic cotton industry will cease to exist! - There would be no organic cotton grown in the U.S. - Bankruptcy for U.S. organic cotton growers. 	5

§205.602 – Nonsynthetic substances prohibited for use in organic crop production.

Substance	# of responses	Summary of responses
Ash from manure burning	0	
Sodium fluoaluminate	0	

On behalf of our members across the supply chain and the country, the Organic Trade Association thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



Johanna Miranda
 Farm Policy Director
 Organic Trade Association

cc: Laura Batcha
 Executive Director/CEO
 Organic Trade Association

Appendix A – Sample Survey for Crop and Livestock Inputs

1. Please describe the types of organic products produced or handled on your operation:
2. How many states are your products sold in? Are they exported to other countries?
3. How many years has your operation been certified organic?
4. Which organic products do you use the substance on/for? (e.g., lettuces, fruit trees, broiler chickens)
5. What function does the substance provide and why is it necessary? (e.g., to control a specific pest or disease, sanitation, etc.)
6. With what frequency does your operation use the substance? (e.g., seldom, as needed when a certain condition arises, routinely, etc.)
7. Have you tried using any *natural substances* as an alternative to the substance? (e.g., natural oils instead of synthetic pesticides) If so, please describe the availability and efficacy of the alternative substances:
8. Are there any other *management practices* that would eliminate the need for the substance? (e.g., hand weeding instead of using an herbicide; or using a particular harvesting practice to avoid a disease instead of using a fungicide). If so, please describe the efficacy of the alternative management practices:
9. Describe the effects to your operation if you were to no longer be allowed to use this substance in organic production:
 - Agronomic effects (effects to health of crops or livestock):
 - Environmental effects (effects to environment if the substance was no longer allowed; effects to environment from potential alternatives):
 - Economic effects (effects to economic health of your operation):
10. On a scale from 1 to 5 stars, rate the overall necessity of this substance for your organic operation:

Unnecessary (don't need it at all)	Neutral (nice to have but could live without it)	Critical (would leave organic without it)
★	★	★