



October 7, 2014

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-14-0063

**RE: General: OTA and Stakeholder Engagement in the Sunset Review Process**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board on its Sunset Review process.

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 49 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.

NOSB applauds for carefully considering each material and conducting a thorough review. It's critical that NOSB hear from certified farmers and handlers on whether these inputs are consistent with and essential to organic production, or whether there are other effective natural or organic alternatives available.

Materials that have been placed onto the National List should remain on the National List if: 1) they are still essential to and compatible with organic production and handling practices; 2) there are no commercially available alternative materials (natural, organic) or practices; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517 and 6518] 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.

To help facilitate a robust comment and review process, OTA has created an electronic survey for each input under review for 2015 and 2016. We will be creating surveys for all of the 2017 materials as well. The surveys are user-friendly, available to **every NOP certificate holder**, and include 5-7 questions addressing the essentiality of the National List input under review. The goal is to collect information for NOSB to consider at the first stage of the two-step process to shape their 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.

To ensure wide distribution of the surveys beyond OTA membership, OTA is working with Accredited Certifying Agencies (ACAs) that are distributing the survey links to all of their certified clients as well as to targeted clients they know are using the inputs under review. We are also working through our Farmers Advisory Council (FAC<sup>1</sup>) to help assist us with distribution to NOP certified farmers. We hope these efforts will help NOSB in its review process. At this stage of the process, OTA has received feedback from its members indicating that a mechanical alternative may be used in place of the three boiler chemical additives (approved for packaging sterilization only) that are due to sunset in 2016. Aside from the boiler chemicals, to the best of our knowledge, there are no suitable and/or commercially available alternatives to the 2015 or 2016 materials under review.

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 production and/or handling.

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,



Gwendolyn Wyard  
Regulatory Director of Organic Standards and Food Safety  
Organic Trade Association (OTA)

CC: Laura Batcha  
Executive Director and CEO  
Organic Trade Association (OTA)

---

<sup>1</sup> 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.