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October 12th, 2010

The National Organic Standards Board  
c/o Lisa Ahramjian, Executive Director  
1400 Independence Avenue, SW  
Room 2646 – So., Ag Stop 0268  
Washington D.C. 20250-0268

RE: AMS-NOP-10-0068; NOP-10-08

**OTCO CROP/LIVESTOCK COMMENTS:**

**EPA List 4- Inerts of Minimal Concern**

**Apiculture Recommendation**

**Formic Acid**

Dear NOSB Committee Members:

Oregon Tilth, Inc. is a nonprofit research and education membership organization dedicated to biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon and provides organic certification services to organic growers, processors, and handlers nationally and internationally. An NOP accredited certifier since 2002, OTCO currently certifies 750 farms and ranches in over 35 states, affording us a broad perspective.

***EPA List 4-Inerts of Minimal Concern:***

Oregon Tilth supports the relisting of the EPA List 4- Inerts of Minimal Concern as an interim step. While current, the EPA List 4 was a good reference tool and allowed for consistent interpretation. With the dissolution of the EPA List 4, we urge the committee to promptly create a clear system for the review and listing of approved inert ingredients for use in Organic production.

***Apiculture Recommendation:***

Oregon Tilth would like to thank the members of the Livestock Committee (LC) for their work on the proposed apiculture standards. Oregon Tilth supports recommendation of the LC and joins them in calling on the NOP to implement these standards as soon as possible.

As an organization undertaking both public education and certification activities, Oregon Tilth is concerned that the current situation is leading to a vacuum, where various

certifiers are enforcing a wide variety to standards with respect to apiculture products for the US market, particularly for those projects that are currently certified under existing international standards (Canada and the EU).

The lack of clear apiculture standards for the US has lead to confusion among consumers and has the potential to undermine consumer confidence in the organic label as a whole.

***Formic Acid:***

Formic acid, in combination with cultural practices, is a widely used tool in organic beekeeping world wide for the control of *Varroa destructor*, the principal pest of honeybees.

Currently formic acid is allowed under both the EU and Canadian organic apiculture standards. The vast majority of honey currently sold and labeled as organic in the US is produced by foreign operators that are double certified under one or both of these standards. The listing of formic acid would not only put US-based organic beekeepers on a relative par with their foreign counterparts, but, more importantly, would recognize the fact the much of the organic honey coming into the US from abroad is already produced with the use of the product.

Respectfully submitted,

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Oregon Tilth, Inc.

Oregon Tilth, Inc. is a non-profit 501(c)(3) organization that supports and promotes biologically sound and socially equitable agriculture through education, research, advocacy, and product certification.