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Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. S.W.
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

RE: Docket: AMS-NOP-17-0057
Livestock and Crop Subcommittees – Sunset Materials

Dear Ms. Arsenault,

Oregon Tilth thanks the National Organic Standards Board (NOSB) for continuing to systematically review sunset materials and update the National List to ensure organic operations have proper tools to use in organic production and handling. We evaluate all types of materials used in organic operations, providing the NOSB with data-informed comments over the years. Oregon Tilth appreciates the opportunity to provide input from a certifier perspective as requested in the discussion and evaluation of selected materials.

Crop inputs

- Liquid fish
How do certifiers determine the minimum amount of acid needed to stabilize liquid fish products? How do certifiers evaluate liquid fish products for compliance with the pH threshold?

Oregon Tilth requires liquid fish manufacturers to provide verification for all ingredients used and their function for compliance with [Organic Materials Review Institute's \(OMRI\) Generic Materials List](#) restrictions for "Fish Products, liquid – stabilized." Use of synthetic acid requires confirmation of the pH achieved during production. The majority of the liquid fish products used by OTCO-certified clients are OMRI approved. We have not experienced issues regarding fluctuations in the pH during or after production for products that have had the manufacturing process evaluated.

Livestock inputs

Glycerin

How are certifiers tracking that the glycerin used as a teat dip is being produced through the hydrolysis of fats or oils?

Oregon Tilth requires verification that glycerin is produced through the hydrolysis of fats and oil when listed as an active ingredient in teat dips. In some cases, the safety data sheet or another product documentation identifies this information. In other cases, verification of the manufacturing process is requested to confirm compliance with this detail. All active and inactive ingredients are required to be disclosed to evaluate teat dips and kept on file. To date, we have only evaluated three glycerin teat dips. It is more common for glycerin to be used as an emollient or excipient with allowed actives (e.g., iodine, lactic acid, etc.).

Mineral oil

Is mineral oil being used orally? And are organic farmers using mineral oil as a lubricant?

Organic producers commonly use mineral oil externally as a parasiticide or as a lubricant applied to administer treatments such as artificial insemination. Additionally, it is often used as an active or inactive ingredient within other approved external parasiticides and is an approved excipient and EPA List 4 inert ingredient (e.g., Crystal [Crystal Creek White Mineral Oil](#), [Lancaster Ag Products](#), etc.). There may be confusion about the allowance for internal use by the industry — despite approval per the annotation in 205.603(b) — because the term "lubricant" is more commonly used to describe internal use. For example, as a laxative or to address internal impaction (e.g., [Durvet Mineral Oil](#), [Ameri-Vet Mineral Oil](#), etc.). We encourage the NOSB to provide clarity on the intentions of external use or internal use of mineral oil.

Vaccines

What type of documentation are certification agencies currently requesting to determine non-GMO status for the vaccines used on organic livestock? How is this verified? Are they denying the use of GMO vaccines on organic livestock operations?

Vaccines are relied upon by most livestock producers. Oregon Tilth allows vaccines without further review of the ingredients within them, per 205.105(e) and 205.603(a)(4). We believe that the majority, if not all of the available livestock vaccines, have been produced using GMO technology. To change the allowance for GMO vaccines in 205.105 (e) would cause great harm to organic livestock production. There is no way to annotate vaccines to require non-GMO verification unless 205.105(e) is amended.

Some details to consider:

- In some cases, vaccines are required by regulatory authorities to be administered. For example, California's egg safety regulations — which apply to all eggs sold in the state of California regardless of where they are produced — require laying hens to be vaccinated for salmonella prevention in poultry. To our knowledge, these are live modified vaccines which are only available on the market as being produced through GMO technology.
- OTCO certifies over 250 clients who use an average of five or more vaccines as a preventative technique for the health of their animals or as a regulatory requirement. A requirement for non-GMO vaccines, or a requirement to establish lack of commercial availability of non-GMO alternatives to GMO vaccines, would cause a great deal of burden to operations and risk the health of their animals.

We appreciate the thought and detail that the NOSB has put into evaluation of all materials and the questions asked of certifiers and the industry to maintain the National List.

Respectfully submitted,
Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and planet through focus on core areas of certification, conservation, public health, policy and the marketplace.