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

RE: Docket: AMS-NOP-13-0049
NOSB Livestock Sub-Committee
Chlorine Materials in Aquatic Livestock Production

We agree with the Crop Committee's decision to add Chlorine to the National List for use in Aquaculture livestock production but do not support the annotation. We recommend changing the annotation to match the listing of §205.603(a)(7) for use in organic livestock production in order to provide consistency and, more importantly, to include language addressing facility effluent, thereby effectively regulating the use of chlorine to safeguard the environment.

§205.603(a)(7) Chlorine materials—disinfecting and sanitizing facilities and equipment. Residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.

(i) Calcium hypochlorite.

(ii) Chlorine dioxide.

(iii) Sodium hypochlorite.

Certifiers, Accreditors and Organic growers appreciate consistency wherever possible especially when a material is permitted in multiple sections of the National List. The result is consistent interpretation by certifiers, consistent applicability across varying scopes and production systems, and consistent enforcement and corrective action when non-conformities are identified.

The recommended annotation does not address facility discharge levels and therefore does not safeguard the environment as well as the annotations at §205.603(a)(7). In the recommendation the Livestock subcommittee mentions that the materials' use in aquaculture applications is identical to existing uses in other production categories, we agree, and therefore recommend that the annotation also be identical.

Respectfully Submitted,
Oregon Tilth

Oregon Tilth is a nonprofit organization supporting and promoting biologically sound and socially equitable agriculture through education, research, advocacy, and certification. Oregon Tilth advocates sustainable approaches to agricultural production systems and processing, handling, and marketing.