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April 14, 2016

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

**RE: Docket AMS-NOP-15-0085
Crop and Livestock Subcommittees – 2018 Sunset Materials,
Proposed Annotation Changes, Petitioned Materials**

Dear Ms. Arsenault:

Oregon Tilth thanks the National Organic Standards Board (NOSB) for the opportunity to provide input on the materials up for 2018 sunset review, as well as on proposed annotation changes and the new material petitions being considered. We continue to be impressed with the detail and thoughtfulness of the documents and proposals provided, and the Board's thorough consideration of input from the public on these topics.

2018 Crop Sunset Materials

We appreciate the subcommittee asking detailed questions directed at certifiers and producers regarding the use of these materials. OTCO has notified our crop clients of the impending sunset review of these materials, and have urged them to provide public comment to address the questions posed by the subcommittee about these materials. Per the subcommittee's request, we also provide the following data on the use of these materials by our clients:

- **Copper sulfate:** OTCO has no producers doing aquatic shrimp production, and no rice producers who use copper sulfate.
- **Ozone gas:** OTCO has no producers using ozone gas in their irrigation lines.
- **Peracetic acid (PAA):** about 10% of OTCO crop clients use either PAA or PAA/hydrogen peroxide products as sanitizing agents in their operation. Many of them rely on these products as a "tried and true" sanitizer that may be used in direct product contact.

Proposed Annotation Revisions

- **Lidocaine/Procaine:** OTCO supports the proposed annotation revisions for withdrawal times to 8 days in slaughter stock and 6 days in dairy animals. Not only are these withdrawal times based on scientific data regarding the half-life of the materials once administered, we agree that reducing the withdrawal period as proposed will increase the likelihood of these materials being used during painful yet necessary physical alteration procedures. OTCO supports this effort to provide farmers with practical tools to ensure that animal welfare is a priority on organic farms.

- **Parasiticides:** OTCO supports the proposed changes to the Rule and to the annotations for the three parasiticides presently on the National List. The proposed language takes into consideration the science behind the withdrawal times, the farmers' need for emergency treatment options, and the welfare of the animals. While removing the requirement for vet approval on fenbendazole, and the restrictions on method of administration, will require producers to keep more detailed records of their emergency situations requiring the using of synthetic parasiticides, it also allows them flexibility to choose what works best for their operation and their animals. Additionally, the proposed allowance for fiber from treated animals to be sold, labeled or represented as organic once the 90-day withdrawal time is met opens up huge opportunity for the organic animal fiber market in the US.
- **EPA List 4 Annotation Change to Prohibit NPEs:** OTCO is concerned about the proposal to prohibit NPE's. It appears this will be a redundant effort once the NOSB recommendation to work with the Safer Choice Program is implemented, and the EPA has already released an action plan for phasing out NPEs as inerts through both voluntary changes by the industry and through rulemaking action. We would instead encourage the NOSB's efforts being pointed toward promoting the collaboration with the EPA's Safer Choice Program, and providing public information about expected changes to allowed inerts for materials used in organic production. We would also appreciate further guidance and clarification on the allowance for NPEs in iodine livestock products, and other surfactants such as linear alcohol ethoxylates, as this was not addressed during the sunset review of iodine at the October 2015 meeting.

Again, we thank the NOSB for their work and continued evaluation of materials.

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.