



September 29, 2021

Ms. Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

RE: Docket: AMS-NOP-21-0038
Crops Subcommittee; Livestock Subcommittee
Sunset Materials

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board's Committees on Crops and Livestock regarding the current sunset material proposals. For your information, Oregon Tilth provides below lists of crop and livestock materials from the National List and the corresponding number of operations certified by Oregon Tilth that currently use the material(s).

Crop Sunset Materials

- Calcium chloride: 180
- Chlorine materials: 245
- Copper sulfate: 123
- EPA List 3 inerts: 3
- Magnesium oxide: 0
- Ozone gas: 10
- Peracetic acid: 293
- Rotenone: 0 (prohibited)

Crop Petitioned Materials

- *Carbon dioxide*: Regarding carbon dioxide, Oregon Tilth would like to note the existence of non-synthetic forms on the market produced by fermentation. As such, GMO concerns regarding the microorganisms used to produce the carbon dioxide should be considered in the formation of a potential annotation.

- Zero nonsynthetic carbon dioxide inputs approved for crop clients.
- One synthetic carbon dioxide input approved as a post-harvest handling material.

Livestock Sunset Materials

- Activated charcoal: 55
- Calcium borogluconate: 0
 - All livestock healthcare inputs containing calcium borogluconate are currently allowed under the electrolytes listing at 205.603(a)(11), as such the Calcium borogluconate listing is redundant. Oregon Tilth currently has 1,075 operations using electrolytes for livestock healthcare.
- Calcium propionate: 1 excipient [also an electrolyte]
- Chlorine materials: 155
- Kaolin pectin: 0
- Mineral oil — for treatment of intestinal compaction: 36
- Nutritive supplements, injectable: 341
- Propylene glycol: 10
- Sodium chlorite: 10
- Zinc sulfate: 6

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 the planet through focus on core areas of certification, conservation, policy and the marketplace.