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May 4, 2026

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

RE: Docket: AMS-NOP-25-0914

Dear Ms. Arsenault:

Oregon Tilth thanks you for the opportunity to provide comments to the National Organic Standards Board (NOSB). We appreciate the work of the NOSB and its subcommittees and are grateful to have an opportunity to provide feedback. As always, Oregon Tilth supports the NOSB's work to improve and refine the organic system and its processes. We believe that collaborative actions that support and promote continuous improvement will result in a more robust, consistent, and beneficial system.

Compliance, Accreditation, & Certification Subcommittee (CACS)

Proposal: Residue Testing for a Global Supply Chain: Regulation Review (§205.670 and UREC definition)

Thank you for the opportunity to comment on the proposal document addressing residue testing for a global supply chain. We commend the NOSB for considering this complex and evolving issue as it relates to both the integrity of organic products and the practical challenges faced by certifiers, inspectors, and organic producers.

As Oregon Tilth commented in 2025, we support revising §205.671 to explicitly address intentional application of prohibited substances while maintaining flexibility for enforcement where residues result from unavoidable circumstances.

Number and Cost of Sampling and Testing:
We also support the CACS proposal to allow certifiers to pass the cost of testing to operations in risk-driven cases of complaint, investigation, or follow-up; additionally, Oregon Tilth also supports allowing certifiers to pass the cost of risk-based testing for import verification to certified operations. Oregon Tilth also supports the CACS proposal to allow testing of certified operations in the case of complaint, investigation, or follow-up to count toward the certifier's 5% annual minimum. This approach provides certifiers with flexibility, encourages targeted risk-based testing, and strengthens organic integrity.

Regarding NOP 2613, we encourage NOSB to work with NOP to revise the 0.01 ppm threshold, which is inconsistent and often unfair in crops without EPA tolerances (e.g., hay, silage, seed). A risk-based, crop-specific framework is needed to avoid penalizing producers for unavoidable low-level contamination, such as atmospheric drift or background residues.

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Thank you for the opportunity to comment on this important topic addressing residue testing for a global supply chain.

Materials Subcommittee

Oregon Tilth appreciates the opportunity to provide comments on the NOSB Spring 2026 Materials and Sunset Review. Overall, the substances under review remain critical to organic production and handling, and continued listing is supported in most cases. Across multiple listings, improved clarity and consistency in annotations would strengthen implementation, particularly where similar materials appear across different sections of the National List. Aligning language, such as for chlorine materials, would help reduce confusion and support consistent application across scopes.

Chlorine Materials

Chlorine materials continue to be essential for sanitation, disinfection, and water treatment across all sectors, with 39 inputs used by 105 livestock clients, 42 inputs used by 99 crop clients, and 59 inputs used by 159 handling clients. Oregon Tilth supports the proposed updates and recommends aligning annotations to clearly address direct contact with livestock and organic products, while reinforcing that residual chlorine levels must not exceed Safe Drinking Water Act limits. Although alternatives such as ozone gas, which is used by 2 crop clients, and peracetic acid, with 35 inputs used by 107 crop clients for sanitizing and 7 inputs used by 36 clients for disease control, are available in some contexts, chlorine materials remain indispensable. Greater clarity in guidance, particularly in relation to NOP 5026, label compliance, and distinctions between direct and indirect contact, would improve industry implementation. For instance, aligning the livestock annotation language with that used for chlorine materials at 205.601(a)(2) in crop production could enhance consistency and understanding. An example annotation could be Chlorine materials—disinfecting and sanitizing facilities, equipment, and livestock drinking water. Residual chlorine levels in the water *in direct livestock contact* shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.

Livestock Materials

For livestock materials, activated charcoal, calcium borogluconate, calcium propionate, nutritive supplements, and propylene glycol all play important roles in animal health and welfare. Activated charcoal is represented by 3 inputs used by 9 clients for healthcare purposes, with additional nonsynthetic forms used by 2 clients in feed and 2 clients using products for bedding treatment, and no ancillary substances identified in approved products. Calcium borogluconate is not used independently by OTCO clients, however it is included in CMPK formulations used to treat critical conditions such as milk fever. Maintaining a distinct listing ensures access to injectable therapies. Although calcium propionate is not used by Oregon Tilth clients, its continued listing helps avoid limiting treatment options. Nutritive supplements are widely used to address health issues in livestock, with 79 inputs used by 164 clients; however, ambiguity remains regarding injectable versus non-injectable applications of trace minerals and vitamins, indicating a need for further clarification in the annotation. Propylene glycol is represented by 5 products used by 8 clients, and while no current concerns have been identified, Oregon Tilth notes the potential for future considerations related to excluded methods in manufacturing.

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Other livestock materials continue to serve appropriate roles, including kaolin pectin with 1 input used by 1 client, mineral oil with 7 inputs used by 9 clients, and sodium chlorite with 13 inputs used by 12 clients, where the distinction between pre- and post-milking uses is appropriate and not redundant. Zinc sulfate is used in 2 inputs by 2 clients, compared to copper sulfate with 12 inputs used by 72 clients and combination copper sulfate/zinc sulfate products used by 5 clients, indicating that copper sulfate remains the predominant material for foot rot management. No use of lactic acid as a teat dip was identified among Oregon Tilth clients, however OTCO supports its continued listing.

Crop Materials

In crop production, chlorine materials, peracetic acid, ozone gas, and copper sulfate remain important tools for sanitation, disease control, and water treatment. Copper sulfate shows limited use by Oregon Tilth clients, with no current use identified among a small number of rice producers, though it remains an important tool where needed. Magnesium oxide shows zero identified use for its specific annotation, though 91 clients are using 27 humate products where its presence cannot be fully verified due to reliance on OMRI reviews. EPA List 3 inert ingredients show zero standalone listings but are commonly present in passive pheromone dispensers. Calcium chloride, a prohibited nonsynthetic, except as a foliar spray to treat a physiological disorder associated with calcium uptake, is widely present with 46 materials used by 127 clients.

Handling Materials

In handling and processing, cellulose is widely used across multiple functions, with 15 clients using it as an anticaking agent, 8 clients using it as a filtration aid, and 4 clients using it in regenerative casings, generally without ancillary substances of concern. Enzymes are also widely used, with 179 enzyme products used by 95 clients, primarily from microbial, fungal, or plant sources, though systems do not always clearly distinguish source types. Carrageenan is represented by 8 inputs used by 9 clients across various processed products, while tartaric acid includes 3 inputs used by 9 clients and glucono delta-lactone is used by 1 client. Calcium sulfate (mined) shows limited but appropriate use with 1 input used by 9 clients.

Additional handling materials include potassium hydroxide with 15 inputs used by 19 clients and silicon dioxide with 23 inputs used by 33 clients, where further clarification regarding synthetic versus nonsynthetic forms and nano-scale considerations would be beneficial. There currently are no Oregon Tilth clients using potassium lactate, sodium lactate, or agar agar; though each has historical use that supports maintaining their listings for future flexibility.

Conclusion

Oregon Tilth supports the continued allowance of the materials reviewed, emphasizing the importance of maintaining access to essential tools while improving clarity and consistency in annotations and guidance. Incorporating clearer alignment with federal regulatory frameworks and providing additional clarity where confusion exists will support both organic integrity and practical compliance for producers, handlers, and certifiers.

2026 Research Priorities Proposal

Oregon Tilth supports the NOSB's ongoing work on setting an annual list of research priorities for the organic community. We recognize the importance of research and extension for organic and transitioning-to-organic producers. Research applicable to organic and transitioning producers, such as crop

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rotation and pest management techniques, is beneficial to all producers, not just organic operations. Because organic systems prohibit most synthetic inputs, conventional research is often less relevant, making organic-focused research more broadly useful.

We appreciate the NOSB's efforts to both differentiate highest priority topics from ongoing topics and create a new interdisciplinary category that focuses on topics that cover multiple sectors. This interdisciplinary approach resonates well with organic operations that are focused on an integrated systems-based approach to management.

Many of the interdisciplinary research priorities identified by NOSB are important to Oregon Tilth and have also been identified by the operations we work with. While all are important, we would like to specifically highlight two:

- Barriers to Transition to Organic Production
- Research-based information on the economics of organic certification, and production as well as profitability of organic enterprises

In partnership with Oregon State University, Oregon Tilth published *Breaking New Ground: Farmer Perspectives on Organic Transition*. Our report shared findings from a national survey of over 600 transitioning farmers, examining their motivations, obstacles, and the resources and support they need during transition. Drawing on the survey findings, we outlined nine recommendations for how public and private sectors can better support the success of farmers who choose organic.

Address the Unique Needs of Transitioning Farmers

Transitioning farmers in our study were different from other farmers in important ways that need to be considered. In our study, transitioning farmers were significantly more motivated by access to organic markets compared to other groups. At the same time, they identified unique marketplace barriers – specifically, access to organic price premiums, fair prices during transition, and availability of organic price information. To support this group effectively, research should examine how public resources – such as the USDA's Economic Research Service – and private market data services can better provide transparent, actionable market information.

While production challenges remain critical during transition, our findings also underscore the importance of financial preparedness and economic viability. Transitioning farmers ranked financial planning tools among their top five most-needed resources. Future research should therefore integrate financial analysis into organic systems research, including:

- Cost of production comparisons across organic and non-organic systems
- Cost-benefit analyses of different organic practices (e.g., green manure crops vs. purchased fertility inputs)

Re-examine the Relationship Between Yield and Successful Transition

While reduced yields are often cited by both farmers and agricultural service providers as a barrier to organic transition, our survey revealed a more nuanced reality. Three of the four farmer categories we studied did not rank yield loss as a significant concern, and even the one that did (split operations) only considered it a minor obstacle. These findings suggest the need for further research into why yield concerns may be overstated or outweighed by other factors. Potential research questions include:

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- Which cropping systems and practices (e.g., nutrient management strategies, crop rotation designs) can achieve yields in organic systems that are comparable to those in conventional systems?
- How do organic price premiums help offset yield reductions and contribute to long-term farm viability?

Understanding the economic trade-offs and agronomic strategies that contribute to successful transition can help reshape outreach and technical assistance to better align with farmers' actual concerns and opportunities.

Economics of Organic Certification and Profitability

Through our work under the USDA Transition to Organic Partnership Program (TOPP), we have worked with many farmers questioning the profitability of transitioning to organic. We are supportive of research examining the economics and profitability of organic operations as well as tools that can help producers make decisions that impact the economic viability of their operations.

Conclusion

Oregon Tilth encourages continued investment in research and education that centers the lived experiences of organic and transitioning farmers. Effective support requires a holistic understanding of market, agronomic, and financial factors. We urge the NOSB and the entire organic community, including both public and private sectors, to support research, education, and extension that is participatory, grounded in real-world practice, and designed to deliver practical tools for the farmers shaping a more sustainable and resilient agriculture and food future.

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.