



CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

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

Docket: AMS-NOP-18-0071-0001

Re: Crops Subcommittee: 2021 Sunset Reviews

April 4, 2019

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the 2021 Sunset Review of crop substances on the National List of Allowed and Prohibited Substances.

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

In the attached comments, we include the number of CCOF members who list the substance on their Organic System Plan (OSP) because it demonstrates the importance of the substance to organic production. Producers may routinely use all or some substances listed on their OSP, or they may only occasionally use listed substances for specific situations. Some substances are commonly used by organic producers while others are only listed by a few producers who rely on the substance for their site-specific conditions. Therefore, the NOSB should carefully consider the impacts of removing a substance that has been listed on an OSP because producers need a variety of tools available to them.

Our comments also describe how the substance is used by our members and, when possible, whether viable alternatives exist. This information is based upon our experience as a certifier and upon feedback from our members. Although we strongly encourage our members to comment, they do not always have the capacity to directly submit their own comments. Our goal is to relay valuable information about our members' materials and practices to help NOSB maintain a clear, consistent regulatory environment for organic producers of all scales and types.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Nell". The signature is fluid and cursive, with the first name "Peter" and last name "Nell" clearly distinguishable.

Peter Nell

Government Affairs Manager

cc: Kelly Damewood, CEO
Jody Biergiel Colclough, Interim Chief Certification Officer, CCOF Certification Services, LLC

CCOF's Comments on the 2021 Sunset Review Crop Scope Materials

The following comments are based on CCOF member input, our experience offering organic certification for more than 40 years, and our certification of over 2,500 organic farms throughout North America.

§ 205.601(a) – as algicide, disinfectants, and sanitizers, including irrigation system cleaning systems & § 205.601(i) – as plant disease control

Hydrogen peroxide

Many CCOF members use hydrogen peroxide as an irrigation cleaner and for plant disease control. Hydrogen peroxide is a commonly used disinfectant with many crop production applications. Some CCOF members have used hydrogen peroxide as a tool to combat fire blight.

§ 205.601(d) – as animal repellants

Soaps, ammonium

93 CCOF members list ammonium soap on their OSP. Ammonium soap products are used to deter wild animals from organic crops.

§ 205.601(e) – as insecticides (including acaricides or mite control) & § 205.601(i) – as plant disease control

Oils, horticultural

305 CCOF members list horticultural oils on their OSP. Horticultural oils are used for both insect and plant disease management. Horticultural oils are often used in combination with other organic pest and disease management practices to ensure crops are protected.

§ 205.601(f) – as insect management

Pheromones

465 CCOF members list pheromones on their OSP. Pheromones are used in a variety of ways to manage insect populations. Some pheromones are used to disrupt insect mating and others are used to monitor insect presence and population density. Pheromone use continues to grow in organic crop production as various formulations have been developed for specific target species.

§ 205.601(h) – as slug or snail bait

Ferric phosphate

294 CCOF members list ferric phosphate on their OSP. Ferric phosphate is an effective slug and snail pest management material. Ferric phosphate is available through pellets and is not dusted.

§ 205.601(i) – as plant disease control

Potassium bicarbonate

418 CCOF members list potassium bicarbonate on their OSP. Potassium bicarbonate is used for powdery mildew diseases and other plant diseases. Potassium bicarbonate is a nontoxic alternative to other fungicides available to organic crop producers.

§ 205.601(j) – as a plant or soil amendment

Magnesium sulfate

452 list magnesium sulfate on their OSP. Magnesium sulfate is a macronutrient used to increase nitrogen and phosphorus uptake in crops and to amend magnesium deficient soil. It can also be found in blended nutrient fertilizer products.

Dolomite, calcium and magnesium carbonate, is not a substitute for magnesium sulfate in many situations, such as high pH, ample calcium soils. It is only appropriate for situations where the calcium is desired as well as magnesium. Magnesium sulfate is commonly used on west coast soils in situations where producers do not want to increase soil pH and need additional sulfur.

§ 205.601(n) – seed preparations

Hydrogen chloride

No CCOF member lists hydrogen chloride on their OSP. Hydrogen chloride is used for delinting cotton seed for planting.

§ 205.602 – nonsynthetic substances prohibited for use in organic crop production

Ash from manure burning

CCOF supports the continued prohibition of ash from manure burning in organic crop production.

Sodium fluoaluminate (mined)

CCOF supports the continued prohibition of sodium fluoaluminate in organic crop production.