



# CCOF

Organic Certification

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Political Advocacy

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-16-0100-0001  
Re: Crops Subcommittee: 2019 Sunset Reviews

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the 2019 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 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 emergency 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.

Additionally, in our comments we describe how the substance is used and 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 throughout the nation.

Thank you for your careful review of our comments. Please contact me if you would like further information.

Sincerely,

A handwritten signature in black ink that reads 'Kelly Damewood'.

Kelly Damewood  
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO  
Jake Lewin, President, CCOF Certification Services, LLC

## CCOF's Comments on the 2019 Sunset Review Crop Scope Materials

The following comments are based on CCOF's experience offering organic certification for more than 40 years and from certifying over 2,300 organic farms throughout North America.

### § 205.601 (a) – Synthetics Allowed in Organic Crop Production

#### *Chlorine materials – calcium hypochlorite, chlorine dioxide, sodium hypochlorite*

The majority of CCOF members use chlorine materials. Use of chlorine sanitizers is routine in a variety of situations such as cleaning tools and/or equipment. For example, in greenhouse operations workers often sanitize their tools with chlorine materials before moving between greenhouses.

### § 205.601 (b) – Synthetics Allowed in Organic Crop Production

#### *Herbicides, soap-based*

498 CCOF members list a soap-based herbicide on their OSP. These materials are used on roadways, ditches, and around structures. CCOF does not support their use in organic field crop production. However, continued listing of these materials on the National List allows for an entire operation to be certified organic rather than just their fields or production areas. If only organic producing areas are certified, an operation might use prohibited herbicides around roads, ditches, and structures. By allowing soap-based herbicides to be used only on roads and structures, a producer can certify their entire operation as organic.

#### *Biodegradable bio-based mulch film*

Six CCOF members list biodegradable bio-based mulch film on their OSP. So far, material manufacturers have not provided a material that meets the criteria in which they are allowed to decompose in fields. Like other plastic mulches, CCOF growers remove the biodegradable bio-based mulch film by the end of the season. CCOF supports the ongoing discussion of these substances by NOSB to encourage further development of biodegradable bio-based mulch films.

### § 205.601 (e) – Synthetics Allowed in Organic Crop Production

#### *Boric acid*

30 CCOF members have boric acid on their OSP for structural pest control. Boric acid is an ingredient in many sealed ant bait stations, which operations commonly include on their OSP. Boric acid is also included in homemade ant traps. It is proven to successfully manage ants while having a low impact on honey bees and other insects.

#### *Sticky traps/barriers*

CCOF does not have a precise number of members who use sticky traps but their use is very common. Most CCOF certified operations use sticky traps in their pest management systems and do not list them on their input lists. CCOF does not consider sticky traps to be inputs because they are physical tools or devices, which are tracked on CCOF's G5.0 – Pest Management OSP form. Sticky traps can be found on sticks in rows and hung off trees. California state and federal officials often require sticky traps to monitor invasive species. Sticky traps also help growers, researchers, and state or federal officials monitor whether insecticides have been effective and to monitor the presence of beneficial insects. Sticky traps/barriers are benign physical tools that should be allowed as a practice.

### § 205.601 (i) – Synthetics Allowed in Organic Crop Production

#### *Copper sulfate*

205 CCOF members list copper sulfate on their OSP. CCOF members use copper sulfate sparingly for specific, targeted disease control. CCOF has not seen evidence of copper accumulation in the soil. Growers are not motivated to overuse copper materials because these materials are expensive and subject to water and environmental regulations. No viable alternatives exist to copper sulfate, and it is an important material for organic production among CCOF members.

*Coppers, fixed*

850 CCOF members list fixed coppers on their OSP. Fixed coppers play a crucial role in disease control for tree fruit growers and other operations. Additionally, vineyards and fruit farms use fixed coppers to create Bordeaux mixes to manage fungi. Like copper sulfate, no viable alternatives exist. CCOF has not seen evidence of copper accumulation in the soil. Growers are not motivated to overuse copper materials because they are expensive and subject to water and environmental regulations.

**§ 205.601 (j) – Synthetics Allowed in Organic Crop Production**

*Humic acids*

483 CCOF members list humic acids on their OSP. CCOF has long advocated for the international acceptance of humic acids in organic production. Humic acids are important nutrient management tools that improve soil structure and buffer the effects of excessive elements. They are innocuous to the environment.

*Micronutrients: soluble boron products, sulfates, carbonates, oxides or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt; Vitamins B1, C, E*

905 CCOF members list a material with micronutrients on their OSP and an unknown number use materials with vitamins B1, C, and/or E. Micronutrients can only be used when a soil deficiency has been documented “by testing.” CCOF recommends that the annotation be updated to allow for other methods such as by recommendation from a Certified Professional Agronomist. Vitamins are used as plant or soil amendments. Both vitamins and micronutrients are frequent ingredients in blended fertilizers and often producers do not know that they are included in their fertilizers.

**§ 205.602 (d) – Nonsynthetics Prohibited in Organic Crop Production**

*Lead salts*

CCOF members have not expressed interest in using lead salt, and they should remain prohibited. Lead is toxic and could contaminate the soil.

**§ 205.602 (i) – Nonsynthetics Prohibited in Organic Crop Production**

*Tobacco dust (nicotine sulfate)*

CCOF members have not expressed interest in using tobacco dust and it should remain prohibited. Tobacco dust is toxic to insects, animals, and plants.