



# CCOF

Organic Certification

Education & Outreach

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-15-0085; NOP-15-16  
Re: Sunset 2018 Crop Materials

April 13, 2016

Ms. Michelle Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on crop materials that are being reviewed for removal from the National List in 2018.

CCOF (California Certified Organic Farmers) is a nonprofit organization founded in 1973 that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. CCOF is based in Santa Cruz, California, and represents more than 3,000 certified organic members in 42 states and three countries.

CCOF supports relisting materials upon consideration of the following:

- clear alternatives with demonstrated viability for organic operations have not emerged since the original listing
- the material remains in use by organic producers
- substantively new information has not been brought forward to demonstrate that the material is incompatible with organic principals

CCOF supports a stable and consistent environment for organic producers. CCOF strongly urges our members to submit comments on their own behalf; however, it is an ongoing challenge for organic producers to keep track of sunset materials and to submit public comment. The webinar platform is a good addition to the commenting process.

In addition to substantive individual and organizational comments, CCOF also encourages the NOSB to carefully review the number of operations that include the material in question on their organic system plan (OSP). In our comments, CCOF lists the number of certified members with the material in question on their OSPs. Inclusion of a material on an OSP does not mean regular use of the material by an operation. However, each listing indicates an individual operation which may rely on or need the option to use the material under certain circumstances.



## **Crop Substances Listed on 7 CFR 205.601**

### *Copper Sulfate:*

Copper sulfate is listed on the Organic System Plans of 228 CCOF members. It is a critical input for certified organic water-seeded rice producers. Rice producers use it to manage fairy shrimp and algal scum that can interfere with crop germination. CCOF growers do not need to apply copper sulfate annually; however, in certain situations it is an essential tool for producing a rice crop. The growers who use it report that they would not be able to produce a crop without it because no viable alternative exists. Again, rice producers use this material under narrow, controlled circumstances and must verify during their inspection that they are not over-applying it. CCOF has not seen evidence that growers over-apply copper. The high cost of copper materials, in addition to environmental and water regulations, limits its use and consequently reduces the potential for copper accumulation in water and soil.

### *Ozone Gas:*

Three CCOF members list ozone gas on their Organic System Plans for cleaning their irrigation lines. While not in significant use, irrigation line cleaning is an ongoing issue and options are limited.

### *Peracetic Acid:*

Peracetic acid is on 84 CCOF members' Organic System Plans. This material is used for seed cleaning and by pear, Asian pear, and apple growers. Given that antibiotics are no longer allowed to manage fire blight, peracetic acid is one tool that growers still have available to manage fire blight in organic Asian pears, pears, and apples.

### *EPA List 3—Inerts of Unknown Toxicity:*

CCOF previously commented on EPA List 4 inerts in support of the annotation change. CCOF encourages NOP to finalize rulemaking on NOSB's suggested annotation changes before the List 3 inerts are removed from the National List to avoid disrupting producers' ability to use passive pheromone dispensers, which are critical, nontoxic, and highly effective pest management tools in organic tree fruit production.

## **Crop Substances Listed on 7 CFR 205.602**

### *Calcium Chloride:*

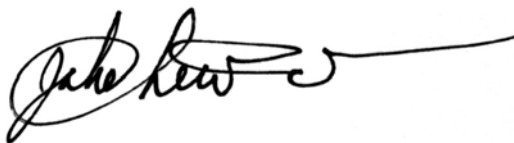
Calcium chloride is listed on 217 CCOF members' Organic System Plans. Some growers with calcium-deficient soils find it to be an essential means of providing their crop with adequate levels of calcium via foliar spray.

Thank you for taking the time to review our information. Please contact us if you would like further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

