



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-16-0049

Re: Crops Subcommittee: Sunset 2018 Materials

October 25, 2016

Dear Ms. Arsenault and NOSB Members,

CCOF (California Certified Organic Farmers) 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 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.

It is important to maintain a stable regulatory environment to support organic producers. Therefore, CCOF generally supports relisting materials based on the following criteria:

- Organic alternatives to the listed material have not been identified since the original listing.
- Organic producers use the material, as evidenced by listing the material in their Organic System Plan (OSP).
- The material is compatible with organic principles.

CCOF encourages the NOSB to consider the number of operations that include the material on their OSP. Although a producer does not routinely use every material on an OSP, many operations include materials that they consistently use or materials that they only use 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.

CCOF joins with the Crops Subcommittee in urging that research be conducted on alternatives to copper sulfate in organic rice production systems.

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. Peracetic acid is an especially critical tool for growers because antibiotics are no longer allowed to manage fire blight.

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 nontoxic and highly effective pest management tools in organic 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 considering our input. Please contact us if you would like further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC