



April 4, 2018

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National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave., SW.,  
Room 2642-S., Mail Stop 0268  
Washington, DC 20250-0268

Submitted via [www.regulations.gov](http://www.regulations.gov)

**RE: Document #AMS-NOP-17-0057**

**NOSB Crops, Livestock, and Handling Subcommittee Proposals: NOSB Sunset Materials – All**

Dear NOSB Members:

Thank you for the opportunity to comment on the materials due for sunset review. We have compiled materials information as best we could in the time provided. MOSA currently certifies approximately 2000 operations. This includes approximately 900 livestock operations and 275 handlers. As a result, we have extensive experience with reviewing input materials. We maintain an internal materials review database including over 7000 brand name products and generic materials.

We recognize that an important part of assessing the necessity of materials on the National List is gathering information about materials' current use. The attached table - titled "2018 Spring Sunset Materials MOSA information" - summarizes the fairly brief information we collected. *Please note: Contrary to the guidance on submitting comments, we are deliberately not taking a position for or against the continued listing of any particular material. We are only providing information based on observations of client use to assist the sunset review process.*

Our table includes our best answers to the questions posed by the NOSB subcommittee and our comments regarding client use of the material. Our current database format does not enable us to capture client-specific quantitative data, but we do record information about materials reviewed for clients and our records are specific to the use requested. We can quantify the number of inputs requested for review, and though we cannot tell exactly how many of our clients use a particular product, we can give a general sense of the uses we see on operations we certify. In our chart, we have only included materials for which we have comments.

Thank you for your ongoing review work for sunset materials. We are available to answer any questions that you may have.

Respectfully submitted,

The MOSA Certification Team