



May 4, 2026

Ms. Michelle Arsenault, Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP

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

RE: Docket # AMS-NOP-25-0914

## **NOSB Livestock Subcommittee Proposal on Chlorine Materials in Livestock Drinking Water, Spring 2026**

Dear NOSB Members:

Thank you for the opportunity to provide comments on the Livestock Subcommittee's proposal regarding chlorine materials used in livestock drinking water. MOSA certifies over 1,754 organic operations throughout the United States, including approximately 653 livestock operations, 1,427 crop operations, and 385 handling operations.

Hundreds of MOSA certified livestock operations use chlorine materials. In this context, we appreciate the Livestock Subcommittee's work to bring clarity to the annotation at §205.603(a)(10) and MOSA supports the proposed amendment to explicitly include "livestock drinking water" in the allowed uses for chlorine materials.

**Consistency in Interpretation** MOSA currently approves chlorine materials for use in livestock drinking water. Among our clients, chlorine dioxide is the material most commonly used for this function. When a client requests approval to use chlorine materials we apply a restriction that states these are only allowed provided the final drinking water does not exceed Safe Drinking Water Act (SDWA) limits. Specifically, we require producers to verify and document that residual chlorine levels in the water poultry or livestock drink do not exceed 4 ppm for hypochlorites and 0.8 ppm for chlorine dioxide. Formalizing this in the regulation will eliminate any inconsistency among certifiers regarding the direct treatment of livestock water.

**Practical Burden and Monitoring** While we support the clarification, we emphasize that any new guidance must remain practical. Making the proposed update to the listing at §205.603(a)(10) will align the regulations with MOSA's current practice without adding additional burdens to producers who currently use chlorine in livestock drinking water. As such, MOSA supports this update.

Respectfully submitted,

The MOSA Certification Team