

**2017 Spring Sunset Materials MOSA Information  
2019 Sunset Review - first meeting**

<b>Material</b>	<b>How many inputs have we reviewed containing the material noted?</b>	<b>How many clients use the material noted?</b>	<b>Comments on material?</b>
<b>Crop Material</b>			
(205.601)(b) Biodegradable biobased mulch film			Many clients would appreciate a product that meets the standards set for compliance, or to see standards set which products can comply with. To date, we've reviewed no materials that qualify with the current standards.
205.601(a) Calcium hypochlorite	5		Chlorine is widely used as a sanitizer on vegetable operations
205.601(a) Chlorine dioxide	7		Chlorine is widely used as a sanitizer on vegetable operations
205.601(a) Sodium hypochlorite	50		Chlorine is widely used as a sanitizer on vegetable operations
205.601(b) Herbicides, soap-based			
205.601(e) Boric acid			We do not see this material in use
205.601(e) Sticky traps/barriers			Commonly used
205.601(i) Copper sulfate			Coppers are commonly used for blight control in solanaceous crops.
205.601(i) Coppers, fixed			Coppers are commonly used for blight control in solanaceous crops.
205.601(j) Humic acids	More than a hundred		Common fertilizer ingredient
Micronutrients 205.601(j) Soluble boron			Very commonly used

products			
Micronutrients 205.601(j) Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt	More than a hundred		Very commonly used
205.601(j) Vitamin B1			Rarely used individually but are included as an ingredient in some of the products we see for fertility.
205.601(j) Vitamin C			Rarely used individually but are included as an ingredient in some of the products we see for fertility.
205.601(j) Vitamin E			Rarely used individually but are included as an ingredient in some of the products we see for fertility.
205.602(d) Lead salts			
205.602(i) Tobacco dust (nicotine sulfate)			
<b>Livestock Material</b>			
205.603(a) Calcium hypochlorite	5		Very very commonly used for equipment cleaning and sanitation
205.603(a) Chlorhexidine	35		Used under restriction, particularly in freezing temperatures where teats freezing may occur or when SCC is very high
205.603(a) Chlorine dioxide	7		Very very commonly used for equipment cleaning and sanitation
205.603(a) Glucose	15		Commonly used electrolyte ingredient

205.603(a) Oxytocin			An important tool for some farmers for use according to restrictions, but not very common. Some milk buyers prohibit use
205.603(a) Sodium hypochlorite	50		Very very commonly used for equipment cleaning and sanitation
205.603(a) Tolazoline			
205.603(b) Copper sulfate	17		Very common hoof treatment. Zinc sulfate is an alternative that's frequently requested.
205.603(b) Lidocaine			Used sometimes with alterations
205.603(b) Procaine			We do not observe this material being used
<b>Handling Material</b>			
205.605(a) Attapulgate			
205.605(a) Bentonite			
205.605(a) Diatomaceous earth		We have seen use in a few syrup operations	Sometimes used as a filtration aid for liquid products like syrup
205.605(a) Nitrogen		We have seen use in packaging	We might benefit from more education regarding the oil-free restriction. We seem to recall this is rarely at issue.
205.605(a) Sodium carbonate			
205.605(b) Acidified sodium chlorite			
205.605(b) Calcium hypochlorite			NOP instruction on use is very helpful and reasonable
205.605(b)			Commonly used

Carbon dioxide			
205.605(b) Chlorine dioxide			NOP instruction on use is very helpful and reasonable
205.605(b) Magnesium chloride			
205.605(b) Potassium acid tartrate			Reclassification of this material as agricultural or nonsynthetic is sensible, and could encourage organic supply/sourcing.
205.605(b) Sodium hypochlorite	50		NOP instruction on use is very helpful and reasonable
205.605(b) Sodium phosphates			Used in making processed cheese products.
205.606 Casings		Meat processors use casings.	We understand this to be a challenge of linking supply to processing. We also see use of cellulose casings. We have prohibited use of collagen casings, unless they're obviously peelable and not intended to be eaten.
205.606 Konjac flour			
205.606 Pectin (non - amidated forms only)		Jam/jelly processors & some dairy processors – (5-10 total)	

**Specific Questions:**

**205.605(b) Potassium acid tartrate** - Should this material be re-classified as agricultural or non-synthetic and therefore be listed at §205.606 or §205.605(a)?

*Reclassification of this material as agricultural or nonsynthetic is sensible, and could encourage organic supply/sourcing.*

**205.605(b) Sodium phosphates**- Given that this material is not allowed in organic foods produced in Europe, what alternatives are used?

*Potassium phosphates are alternatives, usually for foods that want the action (emulsification, pH buffering) of phosphates without the added sodium ions.*

**205.603(a) Chlorhexidine** -

1. Does chlorhexidine provide an essential function that other natural materials or synthetics

proposed or currently on the national list do not provide?

2. Is chlorhexidine used widely in organic livestock production?

*We do not see it widely used, but it is used, particularly when iodine or other agents are proving ineffective during winter months.*

**205.603(b) Copper sulfate**

1. The livestock subcommittee requests public comment on the use of Copper Sulfate and its essentiality in organic processing.

2. Are there any alternative practices or substances available that might be preferable?

*Zinc sulfate is an alternative that many clients request to use. Though not currently allowed, it has been petitioned for use and recommended by the NOSB for addition to the National List as a foot bath only.*

**205.603(b) Procaine**

1. Is procaine used in organic livestock production?

2. Is procaine available in the US in its pure form or only in combination with antibiotics?

*We do not see procaine use on operations we certify.*

**205.601(j) Humic acids** - Should there be an annotation requiring that humic acids come from sources with the lowest environmental and human harm?

*We wonder how this would be verified by certifiers.*

**205.602(i) Tobacco dust (nicotine sulfate)** - 1. Is there any new information that would lessen the human and environmental concerns associated with the use of this material?

*While we consider tobacco dust, tobacco tea, and tobacco smoke prohibited, we do allow composting and incorporating agricultural crop materials into the soil.*