



March 30, 2017

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

Submitted via www.regulations.gov

RE: Docket: [AMS-NOP-16-0100](#) NOP-16-11

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 we could in the time provided. MOSA currently certifies approximately 2000 operations. This includes approximately 900 livestock operations and 215 handlers. As a result, we have extensive experience with reviewing input materials and we maintain an internal materials review database which includes over 6000 brand name products and generic materials.

We recognize that an important part of assessing the necessity of materials on the National List is to gather information about the current use of materials. The attached table - titled "2017 Spring Sunset Materials MOSA information" - summarizes the fairly brief information MOSA collected. *Please note: Contrary to the guidance on submitting comments, we are deliberately not taking a position for or against the 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 three different columns of information that we would think are useful: the quantity of inputs containing the materials requested by clients and reviewed for use; the number of clients using a particular material on their organic operations; 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 use we see. Areas where we have little or no information to contribute have been left blank.

The NOSB also asked several questions in the review of specific materials. At the end of the chart, when possible, we have provided answers to the questions asked.

Thank you for your work on this topic. We are available to answer any questions that you may have.

Respectfully submitted,

The MOSA Certification Team