



September 29, 2022

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National Organic Standards Board
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Submitted via [Regulations.gov](https://www.regulations.gov).

RE:

Document Citation: 87 FR 37495

Page: 37495-37496 (2 pages)

Agency/Docket Number: Doc. No. AMS-NOP-22-0042

Document Number: 2022-13427

[NOSB Crops Subcommittee proposal on Potassium Hydroxide as a production aid in the production of liquid fish products.](#)

Dear NOSB Members:

Thank you for the opportunity to provide comments on the 2022 Fall Crops Subcommittee Proposal on Potassium Hydroxide as a production aid in the production of liquid fish products. MOSA certifies over 1,900 organic operations throughout the United States, including over 700 livestock operations, 1,750 crop operations, and 325 handling operations. Almost all MOSA certified operations use some National List materials, and liquid fish is a common fertility input. It is noteworthy that none of the fish products currently approved for organic use are processed using potassium hydroxide.

If NOSB determines that the addition of potassium hydroxide to the National List is appropriate, *where* on §205.601 this material would be added is important. The NOSB motion is not clear.

Motion to add potassium hydroxide to the National List as a processing aid at §205.601.

Where specifically on §205.601 does NOSB propose to make this addition? The proposal noted, *“The petitioner is requesting that potassium hydroxide be added to 7 CFR §205.601(j)(4) as a synthetic substance allowed for use in organic crop production to be used as a production aid for the emulsion of invasive carp to produce a liquid fish product.”* We agree that any listing of potassium hydroxide for liquid fish should not be specific to invasive carp.

Listing at (j)(4) does not seem accurate. The (j)(4) listing is for lignin sulfonate as a chelating agent or dust suppressant. If potassium hydroxide would be added, we think it would be added

to (j)(8), liquid fish products, and in a manner similar to the listing for aquatic plant extracts or the listing for humic acids.

Aquatic plant extracts: Extraction process is limited to the use of potassium hydroxide or sodium hydroxide; solvent amount used is limited to that amount necessary for extraction. Humic acids - naturally occurring deposits, water and alkali extracts only. This standard is further clarified through [PM 13-1 Humic Acid Extraction](#).

The new liquid fish listing would state:

*Liquid fish products - can be pH adjusted with sulfuric, citric or phosphoric acid. The amount of acid used shall not exceed the minimum needed to lower the pH to 3.5. **Extraction process is limited to the use of potassium hydroxide; solvent amount used is limited to that amount necessary for extraction.***

As a final thought, if the NOSB determines to add this material to the National List, then we have another scenario where the amount of the extractant needed for extraction is undefined. The solvent amount allowed for use is limited to the amount necessary for extraction and it is not transparent when levels breach into fortification rather than being limited to extraction. Further guidance for making this determination will be helpful.

Thank you for carefully considering if a new synthetic material should be added to the National List for liquid fish production.

Respectfully submitted,

The MOSA Certification Team