



April 5, 2021

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

RE: Docket #AMS-NOP-20-0089

NOSB Crops, Livestock, and Handling Subcommittees Sunset Reviews

Dear NOSB Members:

Thank you for the opportunity to provide comments on the 2023 Sunset Review Materials. MOSA certifies approximately 2,100 organic operations throughout the United States, including approximately 765 livestock operations, 1,810 crop operations, and 325 handling operations. Almost all MOSA certified operations use some National List materials.

MOSA's italicised comments after the individual materials below include information taken from our database, as well as anecdotal comments from staff regarding their experiences during file review. We've provided answers to NOSB questions where we have information to offer.

Livestock Substances § 205.603 & § 205.604

Activated charcoal

- Is activated charcoal essential to organic livestock health care and production?
MOSA has fewer than five producers using an activated charcoal health input.

Calcium borogluconate

- Calcium borogluconate also appears on the National List under allowed electrolytes. Please describe the history and the importance of calcium borogluconate's consideration by organic systems as a stand-alone substance.
It is our understanding that the NOSB recommendation to list this material came at a time when it was unclear whether calcium borogluconate was allowed. The 2015 Technical Report on Electrolytes was helpful in noting all of the different materials that fall into the electrolyte category. Individual listing of calcium borogluconate (and also calcium propionate) became unnecessary after the TR on Electrolytes. Calcium borogluconate is a very common electrolyte treatment for milk fever. Our database shows almost 20 different calcium borogluconate inputs, used by approximately 125 clients. From our perspective, it is unnecessary to maintain a separate listing. We commented to that effect when the rule was proposed. However,

the listing also doesn't result in different decision making, so we also do not have a concern with it being listed individually.

Calcium propionate

- Do our livestock stakeholders think the listing for calcium propionate is necessary at §205.603(a)(8) since electrolytes are listed as a group at §205.603(a)(11) Electrolytes—without antibiotics?

Calcium propionate is an ingredient in several electrolyte products in use by several clients for the treatment of milk fever. Like calcium borogluconate, the specific listing of calcium propionate is unnecessary but also does not create different decision making.

Chlorine materials (Calcium hypochlorite, Chlorine dioxide, sodium hypochlorite) Chlorine materials - Hypochlorous acid- generated from electrolyzed water.

Chlorine materials are the most common sanitizers we see in use on all types of operations.

Kaolin pectin

- How widely used is kaolin pectin in organic livestock production?
We have about ten clients using a kaolin pectin product for intestinal disorders and calf scours.
- Is there any concern that organic livestock producers may be using kaolin pectin on a routine, prophylactic basis, rather than solely to address livestock illness?
We do not see clients using it for any reasons other than intestinal disorders and calf scours. It is not used on a routine basis on MOSA certified operations.

Mineral Oil

- Are there differences in interpretations by certifiers for allowed use of mineral oil as a treatment of intestinal compaction in livestock (7 CFR 205.603(a)(20))?
MOSA has about five clients using mineral oil for intestinal disorders. We allow the use of mineral oil for intestinal compaction, such as a laxative or drench. We have not heard of any discrepancies among certifiers. The ACA Materials working group determined that we are consistent in our review of this material.

Nutritive supplements

We have reviewed about 65 injectable vitamin inputs total (~40 are deemed as allowed), and about 430 clients use allowed inputs. We appreciate the listing as “by or on the order of a licensed veterinarian” rather than only “by”.

Propylene glycol

Approximately 20 clients use a propylene glycol product for ketosis.

Sodium chlorite, acidified

We have reviewed one acidified sodium chlorite teat dip, which is in use by five clients.

Zinc sulfate

- Has the use of zinc sulfate reduced the use of copper sulfate in treating foot disease in livestock?
We surprisingly report that our database shows we have no clients using a zinc sulfate foot care input, and we have almost 100 clients using a copper sulfate input.

[Handling Substances § 205.605\(a\), § 205.605\(b\), § 205.606](#)

We are in the middle of entering all handling client's ingredients information into our improved database so the information below could change somewhat, before our fall comments.

Agar-agar

Agar-agar is used as an ingredient by a few MOSA clients, but that's not quantifiable yet through our materials database.

Animal enzymes

Enzymes are a common ingredient in use, but we do not easily have a way to narrow down the types of enzymes in use. We have about 100 entries showing over 60 different enzymes in use by MOSA clients.

Calcium sulfate - mined

There are less than five calcium sulfate ingredients or processing aids listed in our database.

Carrageenan

Carrageenan is only included as a sub-ingredient within a few ingredients in use by a few clients.

Glucono delta-lactone

We have one input in the database and that input is currently in review.

Tartaric acid

We have no recorded ingredients.

Cellulose

There are approximately ten clients using an ingredient or processing aid with cellulose as an ingredient. We've only reviewed a handful of specific products containing cellulose.

Chlorine materials (Calcium hypochlorite, Chlorine dioxide, hypochlorous acid, sodium hypochlorite)

Chlorine materials are the most common sanitizers we see in use.

Potassium hydroxide

We have over 20 processing sanitation materials approved for use, by over 60 clients.

Potassium lactate

There are no recorded materials with potassium lactate as an ingredient.

Silicon dioxide

We've reviewed about a dozen inputs in use by about a dozen clients.

Sodium lactate

There are no recorded entries of inputs with sodium lactate as an ingredient.

[Crops Substances § 205.601 & § 205.602](#)**Copper sulfate §205.601(a)(3) & (e)(4)**

MOSA has no inputs recorded for these uses.

Ozone gas §205.601(a)(5)

Ozone is actively in use by a few of our clients.

Peracetic acid §205.601(a)(6) & (i)(8)

We have only reviewed one crop product which includes peracetic acid, in use by one client.

EPA List 3 - Inerts of unknown toxicity – §205.601(m)(2)

Pheromones are in a unique category of input to review. We often see passive pheromone dispensers, traps, and lures in use on crop operations as part of integrated pest management.

Chlorine materials (Calcium hypochlorite, Chlorine dioxide, hypochlorous acid, sodium hypochlorite)

Chlorine materials are the most common sanitizers we see in use.

Magnesium oxide – §205.601(j)(5)

We do not have any recorded entries in our database with magnesium oxide as an ingredient for this use.

Calcium chloride §205.602

- On which crops and for what physiological disorders associated with calcium uptake is calcium chloride used by producers?

We have about 20 clients using a calcium chloride input for various calcium disorders including blossom end rot in tomatoes and peppers, bitter pit in apples, and tomato fruit cracking. We verify the restriction is met on each operation.

Rotenone §205.602

We have no input on this material.

Thank you for your review of 2023 sunset materials and for your maintenance of the National List.

Respectfully submitted,

The MOSA Certification Team