



October 25, 2021

Jared Clark, Standards Division
National Organic Program
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

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

**Re: [Document Number: AMS-NOP-19-0106; NOP-19-03] RIN 0581-AD98
National Organic Program; National List of Allowed and Prohibited Substances
(2022 Sunset).**

Thank you for the opportunity to provide comments on the proposed changes to the National List for the 2022 Sunset Review Materials. MOSA certifies approximately 2,050 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.

Oxytocin (livestock production)-- There are 35 MOSA certified clients who list oxytocin on their Organic System Plan's inventory of livestock inputs. The use of oxytocin is limited by the National List to "*use in postparturition therapeutic applications.*" MOSA client uses are limited to what we would consider to be therapeutic applications. The uses included in "therapeutic applications" are not specifically defined, but presumably do not include prolonged use to promote milk production. MOSA's clients' descriptions of uses are consistently very similar with one another. These uses include but are not limited to uterine care, milk let down for first time heifers or as a mastitis treatment, retained placenta, and strained labor treatment. We recognize that use during a strained labor isn't necessarily happening *after* birth, but limited use during a strained labor is in line with the intent. We do not see any clients using or intending to use this input to promote milk production of the herd.

MOSA does not allow routine or repeated use of Oxytocin on any operation, and we alert our clients that not all milk buyers permit the use of Oxytocin.

Procaine (livestock production)-- While pain relievers are important and we have 51 clients using a pain reliever, procaine isn't among the ingredients listed for any input in use.

Sucrose octanoate esters (crop or livestock production)-- MOSA has no inputs with this ingredient in use by clients.

Vitamin B1 (crop production)-- One client uses one input with vitamin B1 listed as an ingredient.

Colors (black currant juice color, blueberry juice color, carrot juice color, cherry juice color, grape juice color, paprika color, pumpkin juice color, turmeric extract color) (processing)--

We have limited input on these specific colors. We have one client using Paprika Color, one client using Grape Juice Color, and two clients using Cherry Juice Powder. Cherry Juice Powder can also be used as a flavoring agent.

Whey protein concentrate (processing)-- One client previously used whey protein concentrate but no longer does.

We have no processing clients using **alginate acid, kelp, konjac flour, sweet potato starch or Turkish bay leaves.**

The removal date for all of the substances/ingredients included in this rule is March 15, 2022, except for Turkish bay leaves and whey protein concentrate which have a sunset date of June 27, 2022. Regarding dates, for oxytocin specifically, since it is past birthing season for most MOSA certified dairy producers, we'd suggest waiting until after next spring's birthing season until the input becomes prohibited for use.

Thank you for your prompt work on NOSB sunset material recommendations.

Sincerely,

The MOSA Certification Team