



May 4, 2026

National Organic Standards Board
USDA – AMS – NOP
1400 Independence Ave, SW
Washington, DC 20250
Docket # AMS-NOP-25-0914

National Organic Standards Board members:

The Ohio Ecological Food and Farm Association (OEFFA) is a grassroots network of over 1,700 farmers, gardeners, retailers, educators, and others who since 1979 have worked to cultivate a future in which sustainable and organic farmers thrive, local food nourishes our communities, and agricultural practices protect and enhance our environment. OEFFA is comprised of two distinct entities, referred to as the certification and education sides of the organization. OEFFA Certification has been in operation since 1981, and certified organic farmers make up the bulk of our membership. OEFFA Certification certifies 1,100 organic producers and food processors in a twelve-state region, ensuring that these operations meet the standards established for organic products, and collaborates with partners such as the Accredited Certifiers Association and International Organic Inspectors Association to foster consistency and clarity both in the way we conduct ourselves, and in what we expect from producers and handlers we certify, as well as from our colleagues at the National Organic Program (NOP) and the National Organic Standards Board (NOSB).

OEFFA Education employs sustainable agriculture education, advocacy, and grassroots organizing to promote local and organic foods, helping farmers and eaters connect to build a sustainable food system. We work collaboratively with groups such as the Organic Farmers Association (OFA), the National Organic Coalition (NOC), and the National Sustainable Agriculture Coalition (NSAC) to effect positive food systems change. We support OEFFA farmers and food businesses in their efforts to protect organic integrity and educate their communities about its benefits, its rigor, and its strong values of transparency and continuous improvement.

We thank the National Organic Standards Board members and new leadership for their service to the organic community. OEFFA respectfully offers the following comments:

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BIG PICTURE

SUPPORT FOR THE NATIONAL ORGANIC PROGRAM

The National Organic Program (NOP) is a vital part of the USDA upon which our organization and producers rely. Over the last year, we have experienced uncertainty and changes as a result of the loss of a third of NOP staff. We continue to voice strong support for the program and for NOP staff to be prioritized in future hiring at the USDA. OEFFA also urges USDA to designate NOP staff as 'exempted' going forward, to ensure that NOP activities to maintain essential technology, trade platforms, and to oversee imports and prevent fraudulent activity can continue without disruption and losses for US farms and businesses.

The recent release of the [Organic Trade Association's 2025 annual organic survey](#) shows that certified organic sales are continuing to increase. Organic sales grow faster than the traditional market, reaching \$76.6 billion with an annual growth rate of 6.8% in 2025. Congress has continued to provide level funding for the NOP, which does not reflect this increase. Every \$1 invested in NOP yields over \$3,000 in retail value for the US economy. Despite these financial challenges, our producers have greatly appreciated the NOP doing what they can to work across federal agencies, expand oversight, and work across borders to cooperate with organic trade partners. The deep knowledge in the NOP helps us do our job; however, the budget constraints have led to difficulty with receiving timely responses, slowdowns in service, and, specifically, accessibility issues to the Organic Integrity Database. Our staff has seen the website completely down or not working properly and the certificate download feature malfunctions.

We urge the NOSB to do all they can to advocate for investments across the NOP in staffing, technology, and general support so that the growing organic industry can get the support needed, while demand continues to rise, more producers transition to organic production, and we continue to see fraudulent imports affecting our producers' bottom line. OEFFA remains a partner in these asks to strengthen organic integrity across the market.

FIELD AND GREENHOUSE CONTAINER PRODUCTION

Soil is the foundation of organic agriculture. This principle is enshrined in the Organic Foods Production Act (OFPA 6513), throughout the USDA organic regulations [7 CFR 205.2, .200, .203, .205(a) and in the global organic movement.¹ After the NOP issued a noncompliance to a certifier for quoting OFPA in its explanation of why it would not certify hydroponics, certifiers banded together to issue a Position Statement: Organic Agriculture is Soil-Based.² The position statement has received over 900 endorsements from farmers, consumers, environmental groups and other organic stakeholders including 10 accredited certifiers. The strong support for this position statement, in addition to the ongoing number of public comments to NOSB regarding the topic, is a clear message that stakeholders want consistent enforcement of organic standards that clearly describe soil-based production practices and do not include hydroponics.

In its July 6, 2023 memo to the NOSB, the NOP expressed willingness to move forward with discussion of greenhouse and container standards. These standards are long overdue and urgently needed to increase consistency among

¹ <https://www.ifoam.bio/our-work/what/soil>; <https://www.ifoam.bio/sites/default/files/2021-06/organicsinaction.pdf>, p.45 – Hydroponic Production not in line with Organic Principles

² <https://action.oeffa.org/soil/>

certifiers and provide a fair playing field for farmers. The six certifiers who developed the Position Statement have already worked to align our policies on greenhouse and container production, but without standards we cannot achieve consistency across the industry. Please add “Field and Greenhouse Container Production” back to the NOSB work agenda and lead our community in a discussion of this essential topic. The future of organic integrity depends upon it.

Soil in organic agriculture is not a “wedge issue;” rather, it is foundational to all that we do. Organic agriculture was conceived as a counterpoint to chemical agriculture, and from its inception in the writings of Sir Albert Howard and others – and its roots in Indigenous agricultural systems around the world – it has always been about fostering healthy soil. A healthy soil is biodiverse, sequesters atmospheric carbon, is resilient to drought and erosion, and is capable of producing nutrient-dense food with minimal use of inputs. Organic agriculture treats soil as an ecosystem to be stewarded, not merely a “growing medium” in which to produce crops. This is not a critique of growing food in containers, but such practices are very simply not aligned with the most basic principles of *organic* agriculture.

Because aeroponic, hydroponic, and crops grown to maturity in containers do not comply with OFPA 6513(b)(1), and because there is significant inconsistency in the way these forms of production are being handled by organic certifiers presently, we again urge the NOSB to call for a moratorium on the certification of new aeroponic operations, hydroponic operations, and crops grown to maturity in containers until we can utilize our existing NOSB and rulemaking process to move forward with greater consistency.

EXPANDING OPPORTUNITY IN ORGANIC FARMING

We are grateful for the continued work of the NOSB and NOP upholding the integrity of the organic label and ensuring the trust of American households and beyond in organics, while expanding opportunity for America’s organic farmers. Because of this trust, public demand for organic continues to grow. A recent survey found that 55 percent of consumers believe organic fruits and vegetables are better for their health than conventionally grown produce. That number is even higher among younger generations - a recent Organic Trade Association (OTA) study showed that more than three in four millennials and Gen Z respondents say it’s important to buy and eat organic food. Initiatives such as the Transition to Organic Partnership Program (TOPP) and Organic Market Development Grants have been instrumental in helping new producers reach this thriving market while expanding opportunity for existing ones, but more still needs to be done.

As this demand continues to grow, we need more American organic farmers and acreage especially with organic acreage decreasing. OEFFA, for the first time ever, saw a decrease in acreage in 2025 but an increase in organic operations, meaning there is a decrease in organic acres per farm OEFFA certifies. While organic represents 6.1 percent of total food sales, only 1 percent of U.S. farmland grows organic crops. The U.S. now imports \$3.3 billion in organic food each year. Although some products that cannot be grown in the U.S. will always be imported, states like Ohio have a thriving and productive organic farming industry and we want to make sure domestic farmers who are certified organic or considering transitioning can take advantage of this growing market. However, we are concerned about the rise in organic imports and their effects on our domestic producers with their struggles to meet the demand. For example, according to [an Argus study](#), imports of organic soybeans skyrocketed in 2024-2025 and imports of soybean meal reached a record high.

Even with the growing demand, the barriers to organic transition are significant. Land access, capital, and support for transition are among the biggest challenges, and uncertainties and delays surrounding organic cost-share only make things harder. One of organic’s strengths is its ability to inspire young people who did not grow up farming to consider making it their career. As the average age of American farmers continues to increase, it is in our vital interest to harness the energy of this new crop of farmers and support their success. In this way, broadening participation in organic will not only strengthen our movement, but also American agriculture in general, and we encourage the USDA and NOSB to keep

identifying where the barriers are highest and invest in addressing them. We ask that the NOSB continue its efforts to foster a path into organic for producers who are committed to organic principles and practices, welcoming the perspectives of the next generation of organic farmers, and prioritizing the support and market opportunities all organic farmers need to thrive.

OEFFA supports NOC's recommendations for increasing participation in organic programs and encourages the NOSB to consider the following ideas:

- Provide orientation or onboarding training for NOSB members that explores how different communities engage with organic agriculture, and the barriers some have faced in doing so.
- Apply a lens of real-world impact when developing work agenda items, public discussion documents, and proposals—asking who is most affected and whether those perspectives are being heard.
- Include specific agenda items that focus on expanding participation in organic farming, processing, across all regions and types of operations.
- Establish a standing agenda item focused on broadening participation. For example, invite local organizations to share their work at NOSB meetings or have TOPP regions highlight strategies that are helping new producers enter organic.
- Look for ways to seek input from organizations and communities that have not traditionally been part of the NOSB conversation.

FARMER ENGAGEMENT IN NOSB PROCESS

We ask the NOSB to institutionalize farmer listening sessions outside of the two regular semi-annual public comment periods. Listening sessions should be a standard part of the NOSB's annual work and should be entered into the public record. While we greatly appreciate the willingness of some NOSB members to discuss agenda items with farmers in our network as appropriate, this essential dialogue cannot rest solely on the availability and willingness of individual NOSB members, nor should it be exclusive to those organizations that take time and have the resources to set up roundtables. A summer listening session could inform the NOSB's consideration of discussion documents before they become proposals. A winter listening session could be used to inform and help prioritize the NOSB's agenda for the coming year, bringing the NOSB's work into better alignment with farmer needs.

A well-functioning NOSB process must be informed by all members of the organic industry including farmers, organic businesses, scientific and environmental communities, and the general public, which is reflected in NOSB representation. However, farmers are the key linchpin in the organic industry, and their voices and experiences should be held as paramount. This is why OEFFA has consistently advocated for a variable meeting time to ensure that we are hearing a diversity of farmer voices throughout the country and throughout the year. Spring and fall – when the NOSB meetings are held – are incredibly busy times for farmers. We understand that the NOP will not make any meeting time adjustments. This has necessitated OEFFA gathering producers (when we have the meeting materials in time to have a meaningful discussion) to review agenda items and get their feedback, both to inform our comments and to encourage them to sign up for an oral comment slot. However, it is a consistent challenge to get diverse farmer perspectives in time for the NOSB meetings. OEFFA producers have historically been active in providing oral comments. Speaking in person is very valuable for the farmers and the NOSB, and we must continue to make that opportunity accessible. And while OEFFA understands that at times, a virtual meeting may be necessary, we do not want to see meetings default to a virtual setting. The opportunities in-person meetings offer for conversations and networking should be prioritized.

Additionally, for farmers to be truly engaged in the NOSB process, more technical assistance is needed. This should be

available to any farmer NOSB member as well as those who want to provide comments and review reports. Technical assistance to support farmer accessibility can be supportive for participation in the NOSB so that their time can be more focused on providing input and expertise. This can also be helpful for tracking and organizing technical reports so that the larger organic community can more easily integrate into the NOSB process.

Finally, we ask again for meeting materials to be published as early as possible ahead of each NOSB meeting. As a simple matter of timing, much of OEFFA's dialogue with farmers is based on what we *anticipate* the NOSB will propose, rather than what is *actually* proposed. Given more time, we could compile more useful feedback from farmers relative to the NOSB's questions to stakeholders, and we could collect that feedback from a larger number of farmers. This would only serve to enhance the NOSB's understanding of issues and the quality of dialogue.

OEFFA supports NOC's recommendations for increasing farmer participation in the NOSB process and encourages the NOSB to consider the following:

- As a starting point we suggest that the crops committee (or CACS) schedule one public call in the off season to discuss current work agenda items and allow for public input on those items. These off-season calls would help to engage those farmers that are unable to give input during the busy planting/harvest seasons when the full Board meeting is scheduled.

GLOBAL ORGANIC MOVEMENT CONSISTENCY

Just as the US organic regulatory system benefits from consistency of interpretation and application, the international organic movement benefits from consistency across national organic programs. There are a few materials and processes in which there is a lack of consistent practice in the US system, which conflicts with our trade partners, organic neighbors, IFOAM interpretations, and CODEX regulations: specifically, continuing to not address the use of containers in NOP organics and the use of materials such as sodium nitrate. We recognize our global partners want to do business with us when we live up to our true organic standards. We would like to thank the NOSB's ongoing attention to this matter when reviewing each material both at the initial petition and at Sunset. In addition to aligning our materials with our international partners, we can also look to integrating some of their processes for residue testing. One area that could use attention is the types of residues tested for, and ensuring we capture residue testing for pesticides popular in other countries. Another area where we may improve our regulations is residue testing on imports. The E.U. currently puts the responsibility of testing imports on the exporters, and the test must be submitted and show no significant residues prior to being accepted into the country. This would open up markets for U.S. farmers, while maintaining or increasing integrity, should be a pivotal goal of the global organic movement. We appreciate the NOSB's role in working with our international partners and look forward to continued work in this area.

ENFORCEABILITY OF REGULATIONS

A flurry of new regulations has been rolled out in recent years – Origin of Livestock, Strengthening Organic Enforcement, Organic Livestock and Poultry Standards, and Mushroom and Pet Food standards. We welcome these actions by NOP upon the recommendations of NOSB, and it is our goal to be a partner in the process to help deter fraud. American farmers and food handlers rely on these rules being thorough, credible, and practical. However, we (our certification staff and clients) have struggled with implementation of the rules, with varying interpretations and, in some cases, significant confusion among certifiers based on how the rules are worded, and what is (or isn't) addressed in the Preamble to each. In some cases, final rules have significant differences from their proposed versions; unfortunately, some of these differences have made them harder to implement and enforce. Although certifiers are

agents of the Secretary, historically we have not been treated as partners by NOP for new regulations; we are usually given feedback on our interpretations of the regulations only when NOP disagrees with them. Training provided by NOP does not always provide consistent information among different instances of training and answers given to different certifiers. Operations should not be able to receive significantly different answers from certifiers about how a particular statute is interpreted; these inconsistencies lead to “certifier-shopping” as operations seek a more favorable answer. We do want to recognize the changes made to certifier audits, where the NOP is focusing more on systems instead of issuing noncompliances for one-off compliance issues.

The public feedback process between the making of an NOSB recommendation and the publishing of a final rule is long and complex, with multiple iterations of comment periods, and we therefore hesitate to ask for any longer or more complex processes. However, when regulations are worded or framed in a way that is difficult to enforce, it defeats the whole purpose of OFPA. Therefore, **we ask NOP to consider adding a step before publishing final rules in cases where the final rule differs from the proposed rule, to share the regulatory language with certifiers and receive feedback on its enforceability as written.** As agents of USDA and the bodies ultimately responsible for enforcing USDA regulations, it is appropriate for certifiers to have an opportunity to point out areas where the regulatory language is confusing, conflicting, or does not make sense practically. This extra review should **not** be used to allow certifiers to influence the overall content of the rule, such as implementation timeline or the requirements therein; these types of comments are already made during the existing public comment process and rightfully belong to the public. It should serve only the very specific purpose of vetting the regulatory language for completeness, and practical ease of interpretation and enforceability. NOP could then adjust the regulatory text if appropriate, and/or provide additional information in the Preamble to illustrate the meaning and intent of the text.

COMPLIANCE, ACCREDITATION, AND CERTIFICATION

PROPOSAL: RESIDUE TESTING FOR A GLOBAL SUPPLY CHAIN: REGULATION REVIEW

OEFFA appreciates the work that the NOSB has put into this topic. We mostly support the updates to 205.670. We do want to acknowledge that the notification of downstream buyers is a tricky situation unless there is clear guidance that can be backed up by the NOP regulations on what happens to the disposition of said product. We also want to emphasize that determining and notifying downstream buyers can be a huge feat in some cases, and if there is no regulatory requirement for the disposition of said product, then we are putting additional capacity on certifiers and downstream buyers without a clear goal or action.

PROPOSAL: E-COMMERCE LABELING PRACTICES

OEFFA generally agrees with creating a NOP guidance document for this issue instead of updating the regulations. However, we still have some concerns about the enforceability of such a document and the enforcement falling on (certified) entities other than the (uncertified) e-commerce websites, which have ultimate control over these pictures.

CROPS

PROPOSAL: PEAR ESTER

OEFFA supports the addition of pear esters as a crop pest control agent, but we echo NOC's views on this material. We do not support the use of microencapsulated forms for any use. Approved pear ester products should be limited to traps and lures. These compounds should not be allowed for use with direct contact of crops or soil.

2028 SUNSETS

Chlorine Materials

§ 205.601(a)(2) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems. (2) Chlorine materials—For pre-harvest use, residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil must not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except that chlorine products may be used in edible sprout production according to EPA label directions. (iv) for use in water for irrigation purposes.

OEFFA supports the relisting of chlorine materials as essential sanitizers to maintain food safety standards but also acknowledges that they are hazardous to human and environmental health. We agree with NOC's comments that a review of sanitizers as a class of materials is necessary to address what materials are essential and what specific uses they should be approved for.

Peracetic Acid

§ 205.601(a)(6)—for use in disinfecting equipment, seed, and asexually propagated planting material. Also permitted in hydrogen peroxide formulations as allowed in § 205.601(a) at concentration of no more than 6% as indicated on the pesticide product label;

§ 205.601(i)(8) - for use to control fire blight bacteria. Also permitted in hydrogen peroxide formulations as allowed in § 205.601(i) at concentration of no more than 6% as indicated on the pesticide product label.

OEFFA supports the continued listing of peracetic acid, both as a sanitizer and pest control material.

EPA List 3—Inerts of unknown toxicity

§ 205.601(m)(2) —for use only in passive pheromone dispensers.

OEFFA agrees with NOC's comments on EPA List 3 inerts, and we would like to see this listing removed from the NL and individual materials used in pheromone dispensers to be reviewed individually for inclusion.

Calcium Chloride

§ 205.602(c) - brine process is natural and prohibited for use except as a foliar spray to treat a physiological disorder associated with calcium uptake

OEFFA supports the continued listing of calcium chloride as a restricted nonsynthetic substance. We agree that it is essential for situations where calcium is needed to treat a disorder, while limiting its use to avoid excess addition of chlorine to soils.

Rotenone

§ 205.602(f) - (CAS # 83-79-4)

OEFFA supports the continued listing of rotenone as a prohibited nonsynthetic material.

HANDLING

Proposal: Sodium Bicarbonate reclassification

OEFFA supports the Handling Subcommittee's classification of synthetic and nonsynthetic L-malic acid and the motion to add synthetic L-malic acid at 205.605(b).

Proposal: Chitosan

OEFFA agrees that chitosan should be classified as synthetic, and we agree with the subcommittee that this should not be added to the national list.

Proposal: Sodium Bicarbonate

OEFFA agrees on the classification of the different sources of sodium bicarbonate presented by the subcommittee. Directly mined sources of sodium bicarbonate should continue to be allowed at 205.605(a). Material produced through the Trona process should be allowed at 205.605(b) since it has been previously understood to be allowed under the 205.605(a) listing. The Solvay process should continue to be a prohibited synthetic source of sodium bicarbonate.

2028 SUNSETS

Agar-agar

§ 205.605(a)(2)

OEFFA supports the relisting of agar-agar as a long-standing food additive.

Animal enzymes

§ 205.605(a)(3) Animal enzymes - (Rennet - animals derived; Catalase - bovine liver; Animal lipase; Pancreatin; Pepsin; and Trypsin).

OEFFA supports the relisting of animal enzymes as a necessary ingredient for the dairy industry. We are not aware of what the barriers would be for producing these from organic livestock, but we would suspect that the demand for organic dairy processors would not be met by organic enzymes alone.

Calcium sulfate-mined

§ 205.605(a)(8)

OEFFA has no concerns over the use of mined calcium sulfate in organic handling and supports its relisting.

Cellulose

§ 205.605(b)(11) Cellulose (CAS #9004-34-6)—for use in regenerative casings, powdered cellulose as an anti-caking agent (non-chlorine bleached) and filtering aid. Microcrystalline cellulose is prohibited

OEFFA supports the continued listing of cellulose as an essential anti-caking additive for various products, including shredded cheeses.

Chlorine materials – Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid – generated from electrolyzed water, and Sodium hypochlorite

§ 205.605(b)(12)(i-iv) Chlorine materials - disinfecting and sanitizing food contact surfaces, equipment and facilities may be used up to maximum labeled rates. Chlorine materials in water used in direct crop or food contact are permitted at levels approved by the FDA or EPA for such purpose, provided the use is followed by a rinse with potable water at or below the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act. Chlorine in water used as an ingredient in organic food handling must not exceed the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act.

OEFFA supports the relisting of chlorine materials as essential compounds for effective sanitation and food safety. The question of ancillary ingredients is difficult because it is often not possible to obtain all of the ingredients that are not listed as active on the product label. This should be addressed for sanitizers and some guidance needs to be provided to certified operations and certifiers. Do all ancillary ingredients need to be reviewed for all products and for all applications? It would seem that ancillary ingredients should be reviewed for direct food contact purposes, but not for food contact surface and equipment cleaning when there is an intervening event. Surfaces and equipment cleaning without an intervening event is less clear. But this guidance would ensure that all certifiers are enforcing the same policies with regard to cleaners and sanitizers.

Silicon dioxide

§ 205.605(b)(29) Silicon dioxide - Permitted as a defoamer. Allowed for other uses when organic rice hulls are not commercially available.

OEFFA supports the continued listing of silicon dioxide for use as a defoamer. We see this as a common and effective defoamer used in maple syrup production. Based on Policy Memo 15-2, we do not allow sources of silicon dioxide that are engineered nanomaterials. We support adding this to the annotation to confirm that engineered nanomaterials are prohibited.

LIVESTOCK

PROPOSAL: Chlorine Materials

OEFFA currently allows the use of approved chlorine products to treat livestock drinking water when treated municipal water is not available. Since chlorine is used to treat municipal water, we agree that livestock producers should be able to use it as needed. We generally have concerns about citing outside standards (Safe Drinking Water Act, in this case), but we accept it as something to point to in order to define some limit on its use. We support the allowance for operators to demonstrate their compliance with SOP's or water dosing systems that demonstrate compliant use of chlorine materials

rather than requiring testing of any of the treated water sources.

2028 LIVESTOCK SUNSET REVIEWS

Activated Charcoal

§ 205.603(a)(6) (CAS # 7440-44-0)—must be from vegetative sources.

OEFFA supports the continued listing of activated charcoal as a livestock health care material. We do not see excipients used in general for activated charcoal products, and we do not see it used in feed mixes as a synthetic charcoal source would not be approved for organic feed.

Calcium Borogluconate

§ 205.603(a)(7) - (CAS # 5743-34-0)—for treatment of milk fever only.

Calcium Propionate

§ 205.603(a)(8) - (CAS # 4075-81-4)—for treatment of milk fever only.

OEFFA supports the continued listing of calcium borogluconate and calcium propionate as important electrolytes for treating organic livestock. We feel that these materials are covered under the electrolytes allowance and do not necessarily need to be listed individually.

Chlorine Materials

§ 205.603(a)(10) - disinfecting and sanitizing facilities and equipment. Residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.

OEFFA supports the continued listing of chlorine materials.

Kaolin Pectin

§ 205.603(a)(17)- for use as an adsorbent, antidiarrheal, and gut protectant.

OEFFA supports the continued listing of kaolin pectin as an effective and mild treatment for organic livestock.

Mineral Oil

§ 205.603(a)(20) - for treatment of intestinal compaction, prohibited for use as a dust suppressant.

OEFFA supports the continued listing of mineral oil as an essential treatment for organic livestock.

Nutritive supplements

§ 205.603(a)(21) —injectable supplements of trace minerals per paragraph (d)(2) of this section, vitamins per paragraph (d)(3), and electrolytes per paragraph (a)(11), with excipients per paragraph (f), in accordance with FDA and restricted to use by or on the order of a licensed veterinarian.

OEFFA supports the continued listing of injectable nutritive supplements, but we do not feel there is a need to continue requiring the order of a veterinarian to use these products. Some may require a prescription, but otherwise we see no reason to require a veterinarian's order to allow a farmer to use these to treat their livestock. Veterinarians are already in

short supply, and this seems to be an unnecessary burden to access these essential treatments.

Propylene Glycol

§ 205.603(a)(27) — (CAS #57-55-6)—only for treatment of ketosis in ruminants.

OEFFA supports the continued listing of propylene glycol as an essential treatment for ketosis in organic livestock.

Sodium Chlorite, acidified

§ 205.603(a)(28) & 205.603(b)(9) — allowed for use on organic livestock as a teat dip treatment only.

OEFFA supports the continued listing of acidified sodium chlorite for use as a teat dip. We also agree with NOC's comments that this material should be evaluated for its effectiveness and necessity on the NL compared to other substances being used as teat dips, such as organic acids.

Zinc Sulfate

§ 205.603(b)(11) —for use in hoof and foot treatments only.

OEFFA supports the continued listing of zinc sulfate for use as a hoof and foot treatment. There are still many copper sulfate products in use as well, so it does not appear that our producers have opted for zinc over copper products. We do not feel there is a large concern for these products to contribute significant amounts of zinc and copper to the soil.

MATERIALS

DISCUSSION DOCUMENT: RESEARCH PRIORITIES

OEFFA supports the NOSB research priorities and appreciates the NOSB's ongoing work on this topic. This wide-ranging set of priorities reflects the many facets of the organic industry that would benefit from more data and exploration of alternative methods and substances. We ask that the NOSB re-invite representatives from the National Institute of Food and Agriculture (NIFA) to share information about the current status of these research priorities, as they last did in 2022, to ensure the organic community and research institutions have current information about organic-relevant research. We thank the NOSB for continuing to articulate and update these priorities.

DISCUSSION DOCUMENT: INDUCED MUTAGENESIS

OEFFA does not yet have a stance on whether induced mutagenesis (IM) is an excluded method or not. This method takes advantage of natural processes of genetic mutation to produce novel genetic variations. If not classified as an excluded method, we support prohibiting the use of ionizing radiation to produce mutations, and any synthetic chemicals for this purpose should be included on the national list. As for what to do with current varieties bred from IM, we don't believe that any certified organic seeds bred from IM lines should be prohibited from organic production. The responsibility for tracking this down for every variety would likely wind up with the certifiers, and doing this for every variety in production would be impossible, even more so if we had to do this for nonorganic seed. The impacts are potentially detrimental to organic growers, who rely on many of these traits for sustainable production. We would be interested to know if this process has ever been done for seeds derived from other techniques currently listed as excluded methods. IM could be prohibited going forward, but listing current varieties as allowed or prohibited sounds unfeasible. The time and effort needed to do so cannot be picked up by the certifiers and should not land on producers' shoulders. If

the NOP was able to handle it, then it might be possible, but it still seems unlikely to be able to be done fairly where certain varieties are not able to be traced back far enough, or where records do not even exist to confirm an IM lineage.

POLICY DEVELOPMENT

PROPOSAL: PPM UPDATES

OEFFA thanks the NOSB for the additions for PPM updates, but we continue to have the same suggestion. We would recommend adding a requirement for NOP to include any recommended annotation changes (recommended by NOSB) when relisting materials. Thank you for considering this inclusion.

DISCUSSION DOCUMENT: SUNSET REVIEW EFFICIENCY

OEFFA thanks the NOSB for its discussion around sunset review efficiency. We appreciate the willingness to look for efficiencies and taking a pragmatic approach to implementing them.

On behalf of the Ohio Ecological Food and Farm Association and OEFFA Certification,



Lauren Hirtle, Policy Director



Kate Pierfelice, Certification Director