



# CCOF

*Organic Certification Trade Association Education & Outreach Political Advocacy*

To: National Organic Standards Board and National Organic Program  
Re: Comments on the Sunset of Materials from the National List  
Date: April 10, 2006

California Certified Organic Farmers Inc. thanks the NOSB for all the hard work that continues to strengthen the organic industry. As one of the largest and oldest groups of certified organic growers and handlers, we welcome the opportunity to comment on some of the issues before you at this meeting.

We have worked hard and for a long time to provide clarity to our clients on what was allowed and not allowed in organic production and handling and we have tried to do so in a transparent and consistent way with plenty of notice before changes are enacted. Therefore we are pleased that the sunset review is proceeding well in advance of the actual sunset of the National List, but we are dismayed that there is such a short comment period between the posting of the renewing recommendations and the meeting to approve them (less than 3 weeks between posting on the website and the deadline for written comment). We have tried to notify growers of the only material that is recommended for a change of status (hydrated lime), but most are out in their fields desperate to control their diseases in the wake of one of the wettest springs on record in California.

We also would like to see more clarity coming from the leadership of this program about how an annotation for an item on the National List can be changed if it can't be done during the sunset review. In the five years since the rule has been public, some weaknesses in annotations have become apparent. We had been led to believe this could be corrected in the sunset period, but now that is not at all clear because both chlorine products and aquatic plant extracts have had NOSB recommendation or petitions filed for a change and these have not been incorporated into the current set of renewal recommendations.

Please see our specific comments on the relevant materials below:

#### Crops: 205.601 Deferred Sunset Materials

Calcium hypochlorite - CCOF supports the renewal of all chlorine materials but would like to see the annotation be adopted from the original NOSB recommendation.

Chlorine dioxide - CCOF supports the renewal of all chlorine materials but would like to see the annotation be adopted from the original NOSB recommendation.

Sodium hypochlorite - CCOF supports the renewal of all chlorine materials but would like to see the annotation be adopted from the original NOSB recommendation.

Horticultural oils (insecticide) - CCOF supports the renewal of oils for both insect and disease control. While we look forward to the day when vegetable or fish oil could be an adequate substitute in all uses, right now there are effectiveness issues on some of the target pests, as well as the ongoing problem of the inert ingredients in all oils that are needed for them to spread properly. The inerts issue makes it so that the vegetable oils still usually have petroleum based components and are not fully non-synthetic.

Horticultural oils (disease control) - see above.

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Hydrated lime - We are chagrined to see this material not recommended for renewal when there was not a new TAP review or even new information submitted that would indicate removal from the list. The posted recommendation does not even give a reason why this is not recommended for renewal. This, combined with a very short comment period, shows a real disrespect to growers who may have used this material in good faith for many decades. CCOF has 96 apple growers, 58 pear growers, 59 peach growers, 37 apricot growers and 226 grape growers. While not all of them use Bordeaux mix or hydrated lime as a disease control, all of them want recommendations that are consistent and not disruptive of organic fruit production.

Here is some information of how hydrated lime is used in fruit crops. This is not extensive but it is what could be assembled in this short time. It is used by itself against brown rot and blossom blight in peaches and nectarines on about 1000 acres of organic fruit in CCOF. That is most of the certified organic acreage. There are generally 3 applications of 10# per acre hydrated lime mixed with 10# per acre wettable sulfur at pink bud, full bloom and petal fall. Please note that this total application rate of 30#/Acre per year is many orders of magnitude less than any fertilizer application. Richard Olsen is one larger CCOF peach growers who states that it is essential because the use of a pre-formulated lime sulfur would cause the buds to fall off, and the copper sprays at this stage can be phytotoxic. In apricots they use one application of hydrated lime at green tip and then move to copper sprays at bloom.

In apples Bordeaux mix is hand mixed from copper sulfate and hydrated lime to paint onto pruning cuts to control European canker, a disease that kills fruit trees. The attached pdf file on Bordeaux from the University of California explains that the bordeaux that comes pre-mixed in a bag is not nearly as effective or stable as that blended in the field. In grapes bordeaux has been used for almost 100 years for control of black rot, downy mildew, and botrytis diseases. While black rot is more of a problem in Eastern states with grape production, botrytis and mildew may require growers to use a Bordeaux mixture. As alternatives with less environmental impact than copper have arisen for certain situations, growers have been quick to adopt them, but with the variability in weather, agricultural ecology, and all factors in crop production, the organic management plan has to be very site specific and there are situations where Bordeaux is the superior choice.

The attached UC flier (pnbordeauxmixture.pdf) has a comparison chart of the use of Bordeaux with other copper materials. Please note that this does not contain information about the impact of using hydrated lime by itself as an alternative to copper. Since copper is one of the organic materials with the highest environmental profile, an alternative of hydrated lime would be more compatible with the environment in many situations. By removing hydrated lime, growers would end up using more copper in the few situations where one could substitute for the other. The addition of hydrated lime to the copper components make the copper less phytotoxic.

Mr. Olsen states that most of the organic peaches and nectarines could not be produced if hydrated lime is removed from the list. He is happy to speak with any NOSB members about this directly, but is too tied up in his field fighting rain, hail and disease to submit a written comment right now.

Although a bureaucratic snafu in the original National List placed hydrated lime with the wrong annotation (the one meant for copper), there is no question that the original NOSB intended hydrated lime to be on the National List for disease control. OFPA contains a category for "vitamin and mineral" substances to be on the list, and hydrated lime could fall under the mineral grouping if necessary.

CCOF would like to point out that no new information has been presented by the NOSB Crops committee or by the commentors about the negative health effects or environmental effects from applying hydrated lime in the manner stated above. Until this happens, there should be no removal of this from the National List.

Hydrogen peroxide (sanitizer/disinfectant) - We applaud the recommendation to renew Hydrogen peroxide as a production aid. It fills a function that enables other materials to work better or to reduce the use of more toxic materials and so even though it is synthetic, it is a better choice than other inputs in some cases.

Hydrogen peroxide (disease control) - see above

Streptomycin - CCOF supports the renewal of this material. No new information has been presented that would in any way call the original decision into question. The two antibiotic substances on the list are important tools for pear growers in particular, because the fire blight disease can threaten the life of the trees and not just the current year's crop.

Tetracycline - CCOF supports the renewal of this material. No new information has been presented that would in any way call the original decision into question. The two antibiotic substances on the list are important tools for pear growers in particular, because the fire blight disease can threaten the life of the trees and not just the current year's crop.

Aquatic plant extracts - CCOF in general supports the full details of this situation in the comments turned in by OMRI (Organic Materials Review Institute). In particular we would like more definition of the type and quantity of extractants used in these products and would like a thorough review done of potential components such as phosphoric acid and potassium carbonate in these products. We are concerned that excessive amounts of potassium or phosphorus containing extractants or stabilizers could result in synthetic nutrient fortification of these products and would like the annotation to cover this issue beyond what is currently mentioned. However, if the annotation cannot be changed, we are for renewal of the substance as written.

Humic acids - CCOF supports renewal of these materials.

Lignin sulfonate (chelating agent) - CCOF supports the renewal of this material. Although it has gone through synthetic steps to derive it from wood pulp, the material does not have any negative effects on health or the soil from its use, and serves a valuable function in keeping down dust on roadways and in mined minerals where dust is a real health concern for applicators. As a chelating agent it has both superior properties and superior safety to the other synthetic agents, and there is no adequate alternative.

Lignin sulfonate (post-harvest handling floating agent) - see above.

Sodium silicate - CCOF supports renewal of this material.

#### Livestock: 205.602 Deferred Sunset Materials

Non-organic milk replacers - CCOF supports renewal of this material.

Hydrated lime - CCOF supports renewal of this material.

Calcium hypochlorite - CCOF supports the renewal of all chlorine materials but would like to see the annotation be adopted from the original NOSB recommendation.

Chlorine dioxide - CCOF supports the renewal of all chlorine materials but would like to see the annotation be adopted from the original NOSB recommendation.

Sodium hypochlorite - CCOF supports the renewal of all chlorine materials but would like to see the annotation be adopted from the original NOSB recommendation.

Oxytocin - CCOF supports renewal of this material.

Ivermectin - CCOF supports renewal of this material.

#### Processing 205.605 (a) and (b) Deferred Sunset Materials

Unbleached lecithin - CCOF supports renewal of this material until organic lecithin sources can be found for all functional uses.

Bleached lecithin - CCOF supports renewal of this material until organic lecithin sources can be found for all functional uses.

Colors - While CCOF agrees that the use of non-synthetic colors and flavors should be allowed, we find little guidance or definition in the TAP review or the recommendation on how to determine if a color or flavor is non-synthetic. Which extractants and solvents are allowed? How much detail is needed from color and flavor sources to determine compliance?

Flavors - - While CCOF agrees that the use of non-synthetic colors and flavors should be allowed, we find little guidance or definition in the TAP review or the recommendation on how to determine if a color or

flavor is non-synthetic. Which extractants and solvents are allowed? How much detail is needed from color and flavor sources to determine compliance?

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