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September 30, 2013

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So, Ag Stop 0268  
Washington, DC 20250-0268

**RE: Docket: AMS-NOP-13-0049**  
**NOSB Livestock Sub-Committee**  
**Chlorine Materials in Aquatic Livestock Production**

We agree with the Crop Committee's decision to add Chlorine to the National List for use in Aquaculture livestock production but do not support the annotation. We recommend changing the annotation to match the listing of §205.603(a)(7) for use in organic livestock production in order to provide consistency and, more importantly, to include language addressing facility effluent, thereby effectively regulating the use of chlorine to safeguard the environment.

*§205.603(a)(7) Chlorine materials—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.*

*(i) Calcium hypochlorite.*

*(ii) Chlorine dioxide.*

*(iii) Sodium hypochlorite.*

Certifiers, Accreditors and Organic growers appreciate consistency wherever possible especially when a material is permitted in multiple sections of the National List. The result is consistent interpretation by certifiers, consistent applicability across varying scopes and production systems, and consistent enforcement and corrective action when non-conformities are identified.

The recommended annotation does not address facility discharge levels and therefore does not safeguard the environment as well as the annotations at §205.603(a)(7). In the recommendation the Livestock subcommittee mentions that the materials' use in aquaculture applications is identical to existing uses in other production categories, we agree, and therefore recommend that the annotation also be identical.

Respectfully Submitted,  
Oregon Tilth

*Oregon Tilth is a nonprofit organization supporting and promoting biologically sound and socially equitable agriculture through education, research, advocacy, and certification. Oregon Tilth advocates sustainable approaches to agricultural production systems and processing, handling, and marketing.*



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**RE: Docket: AMS-NOP-13-0049  
NOSB Livestock Sub-Committee  
Tocopherols Aquaculture**

We agree with the Livestock Committee's recommendation to add tocopherols to the National List for use in aquaculture livestock production but do not support the annotation. We recommend using the annotation at §205.605(b), which does not include the requirement that tocopherols be extracted without the use of volatile synthetic solvents.

§205.605 (b) Tocopherols—derived from vegetable oil when rosemary extracts are not a suitable alternative.

We are concerned that the prohibition against solvent extracted tocopherols will create an insurmountable barrier to producing organic aquaculture under the pending NOP regulations. It is clear in the TR that tocopherols are essential to the health of aquatic animals but it is not clear when solvent extraction is, or is not, essential to production, and how easy or difficult it will be to source tocopherols that are not solvent extracted. The TR at line 362 indicates that solvents are “commonly and traditionally” used. We do not support this annotation without assurance that there is a dependable supply of tocopherols that meet this criteria since, as the TR at line 595 concludes; No sources were identified that discussed alternative practices that would make the use of an antioxidant unnecessary in aquatic animal feed. Tucker (2012) reports that antioxidants are necessary in aquaculture feeds because the oxidative rancidity of lipids in feeds can affect the survival and growth of fish.

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References: 1995 Technical Advisory Panel (TAP) Report for Tocopherols



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**RE: Docket: AMS-NOP-13-0049  
NOSB Livestock Sub-Committee  
Vitamins in Organic Aquatic Animals Production**

We agree with the Livestock Subcommittee's recommendation to add vitamins to the National List for use in Aquaculture livestock production. We further commend and thank the Livestock Subcommittee for recommending that vitamins be listed as petitioned by the Aquaculture Working Group *without* any additional annotation to the listing at §205.603(d)(3).

Respectfully Submitted,

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**RE: Docket: AMS-NOP-13-0049  
NOSB Livestock Sub-Committee  
Trace Minerals for Aquatic Animals Proposal**

We agree with the Livestock Subcommittee's recommendation to add trace minerals to the National List for use in Aquaculture livestock production. We further commend and thank the Livestock Subcommittee for recommending that trace minerals be listed as petitioned by the Aquaculture Working Group *without* any additional annotation to the listing at §205.603(d)(2).

Respectfully Submitted,

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