



Mr. Robert Pooler  
Standards Division  
National Organic Program  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2642-So, Ag Stop 0268  
Washington, DC 20250-0268

June 29, 2018

Docket: AMS-NOP-17-0080; NOP-17-09  
Regulatory Information Number (RIN) 0581-AD78

Dear Mr. Pooler:

The Western Organic Dairy Producers Alliance (WODPA) thanks you for the opportunity to comment on proposed rule “National Organic Program; Proposed Amendments to the National List of Allowed and Prohibited Substances for 2017 NOSB Recommendations (Livestock and Handling).”

WODPA is the ONLY organic dairy organization working specifically for organic dairymen in the Western United States (Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Texas, Utah, Washington, and Wyoming). WODPA is a nonprofit Mutual Benefit Corporation. Our purpose is to enable organic dairy farmers, situated across an extensive area in the west, to maintain the sustainability of organic dairy farming. We represent over 285 organic dairy farm families throughout the Western United States.

The proposed rule proposes adding elemental sulfur to § 205.603(b) and removing potassium acid tartrate from § 205.605(b) and inserting potassium acid tartrate under § 205.606.

## **Elemental Sulfur**

WODPA fully supports adding elemental sulfur to § 205.603(b), at § 205.603(b)(2), for use as an external pesticide to treat livestock and to treat livestock housing (for the control of mites, fleas, and ticks when preventive practices have proven ineffective).



WESTERN ORGANIC DAIRY PRODUCERS  
ALLIANCE

## Potassium Acid Tartrate

WODPA has no comment on this proposed action.

Again, thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads 'Richard H. Mathews'.

Richard H. Mathews  
Executive Director