

Spring 2015 Subcommittee Proposals and Discussion Document

[ALL PROPOSALS AND DISCUSSION DOCUMENTS](#) (PDF)

AT-A-GLANCE SUMMARY OF PETITIONS AND DISCUSSION DOCUMENTS

Note: 2016 and 2017 Sunset Materials directly follow this section

Crops Subcommittee

[Petition to add Exhaust Gas \(PDF\)](#) to the National List as an allowed synthetic in organic crop production.

- The subcommittee proposal is to *not add* Exhaust gas to the National List. The subcommittee proposal is to *not add* Exhaust gas to the National List for rodent control on organic farms. The proposal cites concerns about effects of exhaust gas on non-target species and soil microorganisms and is not compatible with organic agriculture. *(Subcommittee Vote: 0 in favor; 5 against; 2 absent)*

[Petition to add Calcium Sulfate \(PDF\)](#) to the National List as an allowed synthetic in organic crop production.

- The subcommittee proposal is to *not add* synthetic Calcium Sulfate to the National List for organic crop production. Synthetic Calcium Sulfate, produced by flue gas desulfurization process, would remain prohibited in organic farming. The proposal indicates that there are a number of natural mined alternatives and synthetic Calcium Sulfate lacks essentiality for organic agriculture. *(Subcommittee Vote: 0 in favor; 6 against; 1 absent)*

[Petition to add 3-decene-2-one \(PDF\)](#) to the National List as an allowed synthetic in organic post-harvest handling.

- The subcommittee proposal is to *not add* 3-decen-2-one to the National List for use on organic potatoes as a sprout inhibitor. 3-decen-2-one would remain prohibited in organic post-harvest handling. The proposal acknowledges specific preventative storage procedures and currently allowed non-synthetic alternative materials for sprout inhibition that indicate this substance should not be added to the National List. *(Subcommittee Vote: 0 in favor; 5 against; 1 absent)*

[Report: Contaminated Input Plan \(PDF\)](#)

- The crops subcommittee's discussion document on contamination in farm inputs was considered at NOSB's Fall 2014 meeting in Louisville, KY. The subcommittee continued the work on this topic taking into account feedback at their last meeting and produced a report. This report from the subcommittee outlines a path for evaluating each potential contaminate (pesticides, heavy metals, etc.) from each potential farm input (fertilizers, compost, manure, etc.) with a goal to identify prevention strategies and remediation techniques that will help organic farmers avoid contaminated inputs.

Livestock Subcommittee

[Petition to revise the annotation for Methionine \(MET\) \(PDF\)](#) currently on the National List as an allowed synthetic feed additive in organic poultry diets.

- Methionine is a synthetic essential amino acid currently allowed on the National List for inclusion in organic poultry diets at specific rates. This petition amends the annotation allowing producers to average inclusion rates of Methionine over the lifetime of the animals to accommodate for stage of life and variations in dietary demands. The subcommittee voted in support of the petition and the allowance for averaging specific rates of Methionine in poultry rations over the life of the flock. *(Subcommittee Vote: 6 in favor; 2 against)*

[Petition to add Acidified Sodium Chlorite \(ASC\) \(PDF\)](#) to the National List as an allowed synthetic in organic livestock production.

- The subcommittee proposal is to *add* ASC to the National List as a pre and post teat dip. ASC acts as a disinfectant and can be used as an alternative to more traditionally used, and currently allowed, iodine based teat dips. The subcommittee indicated that this substance met the national list criteria and should be added to the National List. *(Subcommittee Vote: 4 in favor; 1 against; 3 absent)*

[Petition to add Zinc Sulfate \(PDF\)](#) to the National List as an allowed synthetic in organic livestock production.

- The subcommittee proposal is to *add* Zinc Sulfate to the National list as a footbath only. Zinc Sulfate is used to treat hoof conditions in livestock and provides an alternative to currently allowed copper sulfate footbaths. The subcommittee felt that zinc sulfate's potential to diminish the use of copper sulfate on organic farms warranted its inclusion on the National List. *(Subcommittee Vote: 4 in favor; 3 against; 1 absent)*

[Discussion Document: Aquaculture Legacy Document \(PDF\)](#)

- The subcommittee provides stakeholders with an timeline and analysis of action by NOSB on reviewing synthetic materials for use in organic aquaculture. The subcommittee had previously tabled discussions on aquaculture materials until NOP has issued a proposed rule on organic aquaculture standards. The proposed rule has yet to be released, but this document provides a clear summary of NOSB action to date and restates the subcommittee's intention to revisit aquaculture materials upon issuance of a proposed rule.

Handling Subcommittee

[Proposal to remove Glycerin \(PDF\)](#) from the National List as an allowed synthetic in organic processed food.

- The Subcommittee proposal is to remove the allowed synthetic form from § 205.605(b) of the National List and add the agricultural form(s) to § 205.606 as an allowed non-organic ingredient when organic forms are not commercially available. Under this proposal, only "organic" and "agricultural" forms of glycerin would be allowed in NOP certified products. *(Subcommittee Vote: 6 in favor; 0 against; 2 absent)*

[Petition to add Whole Algal Flour \(PDF\)](#) to the National List as an allowed non-OG agricultural ingredient when organic forms are not available.

- The Subcommittee proposal is to **not add** Whole Algal Flour to the National List. This ingredient would continue to be prohibited in organic products. The Handling Subcommittee made its decision due to its

understanding that alternatives are available and therefore is not essential in organic handling.
(Subcommittee Vote: 0 in favor; 6 against)

[Petition to add Ammonium Hydroxide \(PDF\)](#) to the National List as an allowed synthetic boiler water additive.

- The Handling Subcommittee proposes to **not add** this material to the National List because it has the potential to cause significant toxic damage to humans, mammals, aquatic systems and greenhouse gasses and is not essential or compatible with organic agriculture and handling. (Subcommittee Vote: 0 in favor; 5 against; 3 absent)

[Petition to add Polyalkylene Glycol Monobutyl Ether \(PGME\) \(PDF\)](#) to the National List as an allowed synthetic boiler steam additive for use in feed pellet mills.

- The Subcommittee proposal is to **not add** (PGME) to the National List because it comes in contact with the feed pellets and is not essential to processing. Organic feed pellets can be made without it using a mechanical system alternative. (Subcommittee Vote: 0 in favor; 7 against; 1 absent)

[Petition to add Triethyl Citrate \(PDF\)](#) to the National List as an allowed nonsynthetic for use as a whipping enhancer for egg whites during processing.

- The Subcommittee proposal is to **not add** (PGME) to the National List. The subcommittee considers TEC to be synthetic since it is created via a reaction between citric acid and ethanol. It is added to egg whites to recreate textures and related properties, which are lost during pasteurization. This fails the National List criteria for synthetics used in processing. Additionally, alternative compliant processing aids exist. (Subcommittee Vote: 0 in favor; 7 against; 1 absent)

[Proposal: Ancillary Substances for Microorganisms \(PDF\)](#)

The Subcommittee was tasked with reviewing “ancillary substances, “ which are intentionally added to a formulated generic handling substance on the National List. These substances do not have a technical or functional effect in the finished product, and are not considered part of the manufacturing process that has already been reviewed by the NOSB. The subcommittee voted in favor to the approval of several ancillary substances (see Appendix A) for use with Microorganisms. The subcommittee believes that all of the substances listed are necessary because they are what keep the microorganism alive, pure and able to perform. Formulations of the desired microorganism products are not available without some of these ancillary substances. The availability of organic carriers and substrates is sometimes possible therefore the subcommittee also passed a motion to amend its listing to state: “Microorganisms - any food-grade bacteria, fungi, and other microorganism. Organic sources for ancillary substances must be used when available.”

Materials Subcommittee

[Discussion Document: Excluded Methods Terminology \(PDF\)](#)

The Subcommittee discussion document is seeking response from organic stakeholders on issues related to NOP’s regulatory definition of “excluded methods.” The discussion document intends to untangle and update/improve the current definition in light of new methods that have emerged since the NOP definition was adopted in 1995. Public comments from the previous discussion are summarized and new questions are asked. The goal is to have concrete determinations for NOP, Accredited Certifying Agencies, and organic producers to use in keeping GMOs out of organic food and farms.

[Discussion Document: Prevention Strategy Guidance for Excluded Methods in Crops and Handling \(PDF\)](#)

The Subcommittee is soliciting feedback from the organic stakeholders on precautions that organic producers and handlers should take to prevent and minimize contact with GMOs in organic production and processing. Certified operators are already extensively carrying out such practices, but it would be a stronger point in future prevention strategies and policy efforts if it were spelled out in formal guidance from the National Organic Program. The guidance includes a proposal for a seed purity standard for non-organic seed used under the commercial availability clause of the organic regulations. The Subcommittee would like input from the public on the concepts presented in this discussion document, including feedback on whether a seed purity standard for non-organic seed is favorable and if so whether a threshold level should be established.

Compliance, Accreditation, and Certification Subcommittee (CACS)

[Proposal: Peer Review \(PDF\)](#)

The CACS is responding to a NOP memorandum (November 19, 2014) asking them to review and respond to NOP's Peer Review Process. NOP is asking for suggestions for improvement and/ or suggestions on how NOP should consider its implementation. In general, the CACS is suggesting changes related to the composition of the Peer Review Panel. This includes a recommendation to include a NOSB member on the panel and to give priority to PRP members that have strong inspection, certification and accreditation experience. The CACS also recommends that NOP pursue a rule change to 205.509 and remove the reference to FACA and allow the hiring of contractors as an independent assessment body in a manner consistent with the OIG audit findings.

2016 and 2017 Crop, Livestock and Handling Sunset Materials

The following production inputs/materials are due to Sunset (expire) from the National List in either 2016 or 2017, and may not be renewed if new information indicates these substances are incompatible with organic production. Below are links to the Subcommittee summaries and proposals followed by a link to OTA's electronic surveys that can be used to submit feedback. The survey system will help OTA identify the inputs that should be renewed or removed from the National List!

*Important! Note that all motions for Sunset materials are to "remove." A "yes" vote indicates support for removal and a "no" vote for relisting. Including a motion to "remove" in subcommittee proposals ensures that a full Board vote on each material occurs. The subcommittee recommendation will be forwarded to the full Board, discussed and voted on at the NOSB meeting.

Get Involved in the Sunset Review Comment Process!

Let your voice be heard and complete [OTA's Sunset Surveys](#). This system provides an easy opportunity to weigh in on whether the 200+ fertilizers, pest control products, livestock products, ingredients, and processing aids currently allowed in organic production and handling should be renewed or removed from the National List.

The following documents include the National List inputs that NOSB has flagged. They are requesting specific additional information and/or have indicated that they are considering removal from the National List. Your feedback is needed NOW prior to the April 2015 meeting.

- [OTA Summary: 2017 Crops - NOSB Request for additional information](#)

- [OTA Summary: 2017 Livestock - NOSB Request for additional information](#)
- [OTA Summary: 2017 Handling - NOSB Request for additional information](#)

2016 Sunset Materials

- [2016 Crops Sunset Summaries \(PDF\)](#) (to be **voted on** at the spring 2015 meeting):
 - Ferric phosphate –
 - The subcommittee proposal to remove Ferric phosphate from the National List failed. This substance would remain on the National List, as an allowed substance for control of slugs and snails in organic crop production.
(Subcommittee Vote: 2 in favor; 3 against; 2 absent)
 - Hydrogen chloride –
 - The subcommittee proposal to remove Hydrogen chloride from the National List failed. This substance would remain on the National List, as an allowed substance in the delinting of cottonseed prior to planting in organic cotton production.
(Subcommittee Vote: 0 in favor; 5 against; 3 absent)
- [2016 Handling Sunset Summaries \(PDF\)](#) (to be **voted on** at the spring 2015 meeting):

For the following six substances, the Handling Subcommittee found no concerns regarding the continued listing on the National List. The justification for each motion is that the whole NOSB needs to consider and vote on each material, rather than just the individual Subcommittee, to fulfill its' responsibility of Sunset Review:

 - Egg White Lysozyme – 5 in favor of relisting; 0 against; 3 absent
 - Microorganisms – 6 in favor of relisting; 0 against; 2 absent
 - Activated Charcoal – 5 in favor of relisting; 0 against; 3 absent
 - Peracetic Acid - 7 in favor of relisting; 0 against; 1 absent
 - L-Malic Acid – 5 in favor of relisting; 0 against; 3 absent
 - Sodium acid pyrophosphate - 5 in favor of relisting; 0 against; 3 absent

Based on review and public comment from fall 2014, the Subcommittee is proposing removal of the following boiler additives from the National List. They are not essential due to the availability of alternative practices and equipment:

- Cyclohexylamine – 5 in favor of removing; 0 for relisting; 3 absent
- Diethylaminoethanol – 5 in favor of removing; 0 for relisting; 3 absent
- Octadecylamine – 5 in favor of removing; 0 for relisting; 3 absent

The Subcommittee is proposing removal of this substance from the National List due to the availability of alternative natural protein sources. Based on review, they do not believe this substance is essential to organic processing:

- Tetrasodium Pyrophosphate (TSPP), for use as a meat analogue. – 6 in favor of removing; 0 for relisting; 2 absent

2017 Sunset Materials (to be **discussed** at the spring 2015 meeting and **voted on** at the fall meeting)

- [NOSB crops sunset summary](#) (too many to list, refer to this document)
- [NOSB livestock sunset summary](#) (too many to list, refer to this document)

- [NOSB handling sunset summary](#) (too many to list, refer to this document)

How to Provide Direct Comment

OTA always encourages its members to provide direct comment regarding NOSB recommendations. Individuals and organizations wishing to comment at the NOSB meeting must sign up in advance by contacting [Michelle Arsenault](#) (NOSB Special Assistant) at 202-720-0081, or by [reserving an in-person oral comment slot](#). Speaking slots for walk-in commenters may be available, but are not guaranteed.

Written comments should be submitted via [Regulations.gov](#) (keyword “AMS-NOP-15-0002”). You can search for the meeting and submit comments by clicking the link below. Deadline to submit written comments: April 7, 11:59 p.m. Eastern.

To assist the process, OTA has created an easy step-by-step instruction sheet. [Download instructions on submitting comments to Regulations.gov](#)

Appendix A – Ancillary Substances in Microorganisms

| Functional class | Substance name |
|--|---|
| Anti-caking & anti-stick agents | magnesium stearate, calcium silicate, silicon dioxide |
| Carriers and fillers, agricultural or nonsynthetic | lactose, maltodextrins, sucrose, dextrose, potato starch, non-GMO soy oil, rice protein, grain (rice, wheat, corn, barley) flour, milk, autolyzed yeast, inulin, cornstarch, sucrose. |
| Carriers and fillers, synthetic | micro-crystalline cellulose, propylene glycol, stearic acid, dicalcium phosphate. |
| Preservatives | sodium benzoate, potassium sorbate, ascorbic acid |
| Stabilizers | maltodextrin |
| Cytoprotectants used to freeze-dry microorganisms | liquid nitrogen, maltodextrin, magnesium sulfate, dimethyl sulfoxide, sodium aspartate, mannitol, sorbitol |
| Substrate that may remain in final product | milk, lactose, grain (rice, barley, wheat) flour, brewed black tea and sugar, soy |