



2027 Crop Sunset Materials Summaries (2025 Review)

- Unanimous vote to renew
- Majority vote to renew (10-14 votes)
- Significant to remove (9 votes and below) / Vote to remove (4 votes and below)

Link to OTA Crop Sunset Survey: <https://www.cognitoforms.com/OTA6/NOSBSpring2025Crops>

Potassium hypochlorite | §205.601(a)(2)—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.

- **Uses in organic crop production:** Used as cleaner for irrigation systems.
- **OTA Position:** Potassium hypochlorite currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** This is the first sunset review for this substance. Comments in support of adding to the National List pointed to the advantages of avoiding application of sodium to soil when faced with the alternative of using sodium hypochlorite.
- **Board vote at last sunset review:** This is the first sunset review for this substance, which was added to the National List, effective April 22, 2022.
- **Subcommittee questions:**
 1. Is the substance used in concentrations that do not exceed the maximum limits spelled out in the Safe Drinking Water Act?
 2. Is there interest in introducing an annotation to ensure that only potassium hypochlorite produced using environmentally friendly chlorine production methods is allowed for use in organic production in the United States?
 3. Are there effective alternatives?

Soap-based algicide/demossers | §205.601—for use as bait in insect traps only, no direct contact with crop or soil.

- **Uses in organic crop production:** Used to control algae and moss build-up on irrigation systems.
- **OTA Position:** Soap-based algicide/demossers currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.

- **Public comments from last sunset review:** Comments were supportive of continued listing.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Ammonium carbonate | §205.601—for use as bait in insect traps only, no direct contact with crop or soil.

- **Uses in organic crop production:** Used for bait in insect traps.
- **OTA Position:** Ammonium carbonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** Commenters supported renewing the listing, citing its use in controlling cherry fruit fly and spotted wing drosophila. There were no comments advocating for its removal.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**
 1. Is there new research determining the effects of ammonium carbonate bait on non-targeted insect species?

Soaps, insecticidal | §205.601—As insecticides (including acaricides or mite control).

- **Uses in organic crop production:** Used for control of hard- and soft-bodied pest insects in the larval stage.
- **OTA Position:** Insecticidal soaps currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.
- **Public comments from last sunset review:** Comments overwhelmingly supported renewing the listing.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Sucrose octonate esters | §205.601 (CAS #s—42922-74-7; 58064-47-4)—in accordance with approved labeling.

- **Uses in organic crop production:** Used to control soft-bodied pest organisms including mites, aphids, and whiteflies.
- **OTA Position:** Given the Board's recommendation to remove this listing in its last review, OTA is interested in hearing from members if there is a need for this substance, and whether the EPA-registered products containing this substance are in use by organic producers.
- **Public comments from last sunset review:** At the time of last review, there were no substantive comments received from beekeepers in support of renewing this listing. Some commenters supported renewing the listing in view of the

restrictive use of the substance. Commenters in support of removal of the listing pointed to there being no EPA registered products formulated using SOEs as an ingredient. The NOSB voted to remove the listing.

- **Board vote at last sunset review:** **Significant to remove**; note the NOSB recommendation to remove was not acted upon by NOP. Between the time of the NOSB recommendation to remove and the proposed rule to amend the list with its removal, EPA received product registrations for sucrose octanoate esters. In response to comments identifying the EPA registrations, increased use of the substance, and a lack of alternatives, NOP did not remove the substance from the National List.
- **Subcommittee questions:**
 1. Are there EPA-registered products formulated using SOEs?
 2. Is there current information on the need and use of SOE formulations in crop production?
 3. Is there a need to keep SOEs in the crops toolbox to be rotated with other products?

Vitamin D3 | §205.601—as rodenticides.

- **Uses in organic crop production:** Used for rodent control.
- **OTA Position:** Vitamin D3 currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** Comments overwhelmingly supported renewing the listing, with many commenters pointing to its low toxicity to birds and non-target species as an advantage over other rodenticides.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:** None

Aquatic plant extracts | §205.601 (other than hydrolyzed) – Extraction process is limited to the use of potassium hydroxide or sodium hydroxide; solvent amount is limited to that amount necessary for extraction.

- **Uses in organic crop production:** Used as a fertilizer and soil amendment.
- **OTA Position:** Aquatic plant extracts currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.
- **Public comments from last sunset review:** The majority of commenters supported the renewal of the listing and certifiers reported high numbers of farmers with these substances on their organic system plans. Some commenters expressed concern over environmental impacts of harvesting.
- **Board vote at last sunset review:** **Majority vote to renew**
- **Subcommittee questions:** In its review the Crops Subcommittee noted the following:

“Previous Boards have exhaustively focused on the impacts of seaweed harvesting on marine ecosystems and proposed regulations to address these concerns. NOP has declined to implement these recommendations. We are now focusing on the current annotation restriction and whether there is any update needed for this group of substances. We hope to receive information from manufacturers regarding the oversight of their products and the risk of fortifying aquatic plant extracts with potassium derived from the extractant rather than the aquatic plants themselves.”

1. Should NOSB consider an annotation change to aquatic plant extracts to ensure that extractants are not used for their nutrient content? If yes, please provide suggestions for annotation changes and rationale.

Lignin sulfonate | §205.601—chelating agent, dust suppressant.

- **Uses in organic crop production:** Used as a chelating agent and dust suppressant.
- **OTA Position:** Lignin sulfonate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** The majority of comments supported renewing this listing. Commenters opposed to renewing this listing noted the substance is not necessary as organic methods increase organic matter in the soil and provide naturally occurring chelates.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**
 1. Are lignin sulfonates still used as chelating agents or dust suppressants?

Fatty alcohols | §205.601 (C6, C8, C10, and/or C12)—for sucker control in organic tobacco production.

- **Uses in organic crop production:** used to kill or inhibit sucker growth in tobacco plants, which facilitates growth of harvestable leaves, reduces pest pressure, increases crop yields and contributes to farmworker safety in reducing exposure to potential health impacts of manual desuckering.
- **OTA Position:** Fatty alcohols currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic crop production.
- **Public comments from last sunset review:** This is the first sunset review for this substance. Comments in support of adding to the National List pointed to a tool that effectively inhibits sucker growth without exposing workers to the potential health impacts associated with manual desuckering. Additionally, the NOSB acknowledged fatty alcohols readily break down in the environment.
- **Board vote at last sunset review:** This is the first sunset review for this substance, which was added to the National List, effective April 22, 2022.
- **Subcommittee questions:**

1. Are approved organic herbicides, such as those made with organic acids, effective to de-sucker tobacco?

Sodium silicate | §205.601—As floating agents in postharvest handling. Sodium silicate—for tree fruit and fiber processing.

- **Uses in organic crop production:** Used as a floating agent in postharvest handling of tree fruit and fiber.
- **OTA Position:** Sodium silicate currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** There were few comments on this substance, but of those received, supported the listing renewal given its importance as a tool for small pear packers to float the pears out of their water dump tanks and onto their packing lines. Larger packers use mechanical processing, however this equipment is prohibitively expensive for small operations. Note there is an updated technical review for this substance that is informing the Board's review.
- **Board vote at last sunset review:** **Unanimous vote to renew**
- **Subcommittee questions:**
 1. Is sodium silicate still an essential tool as a floating agent for small tree fruit producers?
 2. Are the alternative methods and substances indicated in the updated TR being used by organic producers?
 3. The limited TR indicates that sodium silicate prevents the rapid decomposition of chlorine materials. Does its use as a flotation agent in pear processing have impacts on the efficacy and longevity of chlorine materials that may be used for food safety reasons in pear packing?

EPA List 4 Inerts | §205.601 As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances. (1) EPA List 4—Inerts of Minimal Concern.

- **Uses in organic crop production:** Used as inactive ingredients formulated with allowed pesticide active ingredients.
- **OTA Position:** OTA has commented extensively on this listing, which references a list no longer maintained by EPA. OTA recognizes the need to determine a solution that allows inert ingredients in pest control products that are vital to organic operations, meet OFPA criteria, and allow for the development of new products to meet the needs of organic operations. OTA generally supports the recommended rulemaking options voted on at the October 2024 NOSB meeting and looks forward to further work on this from the NOP.

Until there is an alternative to this listing, OTA supports the continued listing to ensure organic operations have the tools essential to their success.

- **Public comments from last sunset review:** Comments varied widely in terms of support for the pathways for alternatives to this listing. Many recommended moving forward a 2015 recommendation. However, since the last

sunset review the NOSB and NOP have worked significantly more on this issue. The USDA Agricultural Marketing Service published an Advanced Notice of Proposed Rulemaking incorporating several NOSB recommendations. The comments received from this Notice informed an NOP request to the Board to evaluate four options for updating the listing. At its Fall 2024 meeting, the Board recommended two of these options, as well as two hybrid versions of these two options. NOP is expected at some time in the future to move the rule making process forward, during which time there will be additional opportunity to comment.

- **Board vote at last sunset review:** **Significant to remove**

- **Subcommittee questions:**

1. Do stakeholders agree that List 4 Inerts should be relisted until they are replaced with a new listing via the rulemaking process currently underway?

Paper | §205.601—production aids; paper-based crop planting aids

- **Uses in organic crop production:** Used as a crop production aid in pots, seed tape, and collars that are placed directly into the soil.
- **OTA Position:** Paper currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, it is necessary for organic production, there are no viable alternatives, and is consistent with organic crop production.
- **Public comments from last sunset review:** This is the first sunset review for this substance. Comments in support of adding to the National List pointed to the benefits of these aids in facilitating automation and the efficiency that comes from this over planting or transplanting crops by hand.
- **Board vote at last sunset review:** This is the first sunset review for this substance, which was added to the National List, effective December 14, 2022.
- **Subcommittee questions:**
 1. Are our stakeholders aware of materials of concern (like phthalates or PFAS) that could be appearing in paper planting and production aids like paper pots?
 2. Is there soil contamination concerns unique to paper pots because of the potential to use paper pots multiple times in concentrated areas over the course of a single growing season?
 3. Are the restrictions on paper pot composition applicable to the paper feedstock issues that have been raised in the context of compost?

Arsenic | §205.602

- **Uses in organic crop production:** Prohibited for use in organic production. Used in the production of pesticide treated wood products, herbicides, and insecticides for applications in conventional production.
- **OTA Position:** OTA supports the continued prohibition of arsenic in organic production.
- **Public comments from last sunset review:** No comments were received in support of removing the substance from prohibited list.

- Board vote at last sunset review: **Unanimous vote to renew**
- Subcommittee questions: None

Strychnine | §205.602

- **Uses in organic crop production:** Prohibited for use in organic production. Strychnine is a toxic alkaloid allowed in conventional agriculture for below-ground use to control pocket gophers.
- **OTA Position:** OTA supports the continued prohibition of strychnine in organic production.
- **Public comments from last sunset review:** Comments supported the continued prohibition.
- Board vote at last sunset review: **Unanimous vote to renew**
- Subcommittee questions: None