

## FALL 2025 NOSB MEETING

### AT-A-GLANCE SUMMARY OF AGENDA TOPICS & SUBCOMMITTEE VOTES

The [fall 2025 National Organic Standards Board \(NOSB\) Meeting](#) will be held on November 4-6 in Omaha, NE. The [Meeting Agenda](#) and [Meeting Packet](#) (all proposals, discussion documents, and Sunset Reviews to be considered at the meeting) are available, and the comment period is open. The virtual oral comment webinars will occur on October 28 & 30 in advance of the in-person meeting. While OTA will be submitting comments, we encourage you to submit your own comments on the issues that affect your business. The deadline to submit written comments and sign up for oral comments is **October 8, 2025**. Visit OTA's webpage [for more information](#).

---

#### QUICK REFERENCE

[How to Provide Comments to OTA](#)

[Sunset Review Overview](#)

[Handling](#)

[Livestock](#)

[Crops](#)

[Other Topics: Materials | Compliance, Accreditation, and Certification | Policy Development](#)

[Presentations and Panels](#)

[Definitions](#)

---

#### PROVIDE COMMENTS TO OTA

You have an important role in shaping the organic regulations. You will find links throughout this document to easily provide comments directly to OTA on the NOSB's agenda materials. These links will open a draft email that contains information and questions to aid in your feedback and will be sent directly to our staff. Feedback provided will inform OTA's comments to the NOSB and ensure they represent the voice of our membership.

Please submit your comments by **Wednesday, October 1** so that we may review and follow up with any questions.

---

#### SUNSET REVIEW OVERVIEW

At the Spring 2025 meeting, NOSB began its review of substances on the National List that are currently under sunset review and scheduled to sunset in 2027.

**IMPORTANT:** Votes to determine whether these substances remain on the National List will take place at the Fall 2025 meeting. This means there is still time to provide feedback to the Board and inform their decision. OTA has compiled Sunset Summaries for [Handling](#), [Livestock](#), [Crop](#), and substances, which for each substance include:

- The substance's use in organic production
- OTA position on whether the substance continues to meet the criteria for continued listing
- Subcommittee justification and vote overview (unanimous vote to renew, majority vote to renew, or significant/divided vote to remove)
- Subcommittee questions to the community

Please consider these summaries, the OTA position, the importance of the substance to your business, and submit comments directly to OTA staff by clicking on the name of the substance in the tables below.

## HANDLING

### TO BE VOTED ON

#### Proposals

Click here to  
email OTA  
feedback

- **[L-Malic Acid Reclassification](#)** – proposal recognizes the organic material review process has become more refined, and the production methods of L-malic acid have changed. The Subcommittee notes much of the L-malic acid used in organic processing is “synthetic” while L-malic acid is currently listed at § 205.605(a) as a “nonsynthetic” substance. The Subcommittee voted to classify L-malic acid as produced by fermentation and/or enzymatic conversation of carbohydrates as non-synthetic and voted to classify L-malic acid produced from synthetic fumaric acid as synthetic. The Subcommittee made a motion to add L-malic acid to § 205.605(b) so the National List accurately reflects the classification of the substance in use in organic processing. Find the [full proposal here](#).

**Motion to add L-malic acid at § 205.605(b):**

**7 Yes**, 0 No, 0 Abstain, 1 Absent

## SUNSET REVIEWS

Helpful links: [OTA Handling Sunset Summaries](#) | [NOSB Handling Sunset Reviews](#)

MATERIAL	SUBCOMMITTEE VOTE	SUBCOMMITTEE QUESTIONS/COMMENTS
<a href="#">Cornstarch (native)</a>	<b>Significant vote to remove</b>	Based on its findings that there is sufficient supply of organic corn and organic cornstarch, that there is a need for more market opportunities for organic corn producers, and that nearly all Spring 2025 comments supported removal, the Subcommittee proposes to remove cornstarch.
<a href="#">Glycerin</a>	<b>Significant vote to remove</b>	The Subcommittee is divided in its determination of whether there is sufficient supply of organic glycerin, and whether there is a sufficient number of suppliers.
<a href="#">Beet juice extract color</a> <a href="#">Beta-carotene extract color</a> <a href="#">Black/purple carrot juice color</a> <a href="#">Chokeberry, aronia juice color</a> <a href="#">Elderberry juice color</a> <a href="#">Grape skin extract color</a> <a href="#">Purple sweet potato juice color</a> <a href="#">Red cabbage extract color</a> <a href="#">Red radish extract color</a> <a href="#">Saffron extract color</a>	<b>Significant vote to remove (chokeberry-aronia juice, elderberry juice)</b>  <b>Divided vote to renew (black/purple carrot juice, red cabbage extract, saffron extract)</b>  <b>Unanimous vote to renew (beet juice extract, beta carotene extract, grape skin extract, purple potato juice, red radish extract)</b>	The Subcommittee proposes sunsetting colors that were not named as commercially <b>un</b> available in organic form in public comments, and for which no specific technical barriers have been identified to prevent their use.

MATERIAL	SUBCOMMITTEE VOTE	SUBCOMMITTEE QUESTIONS/COMMENTS
<a href="#">Calcium Phosphates (monobasic, dibasic, tribasic)</a>	Majority vote to renew	1. Some public comments called for calcium phosphate use to be limited by type and application. NOSB may recommend increased restrictions through annotations or removal of phosphate food additives in the future. Because the health effects come from the cumulative impact rather than any one specific phosphate alone, NOSB was reluctant to remove any one phosphate from the National List.
<a href="#">Kaolin</a>	Unanimous vote to renew	2. Does kaolin appear in more Organic System Plans that it has during previous reviews? In other words, is the substance in growing or declining use? 3. Does the community have additional information about the presence of heavy metals in some kaolin products?
<a href="#">Sodium bicarbonate</a>	Unanimous vote to renew	The Subcommittee plans to pursue a reclassification of sodium bicarbonate production from sodium carbonate (e.g. Solvay and trona ore) as synthetic. The synthetic processes used to produce sodium bicarbonate will be evaluated to determine whether an annotation is needed to comply with OFPA criteria. The Subcommittee does not intend for this review to limit or exclude sodium bicarbonate currently in use manufactured via the Trona process.
<a href="#">Waxes-nonsynthetic (wood rosin)</a>	Unanimous vote to renew	In Spring 2025 the Subcommittee asked if damaged trees from hurricanes could be used to produce wood rosin. No comments were received indicating this was the case.
<a href="#">Ammonium Bicarbonate</a>	Unanimous vote to renew	
<a href="#">Ammonium Carbonate</a>	Unanimous vote to renew	
<a href="#">Low-acyl gellan gum</a>	Unanimous vote to renew	The Subcommittee noted low-acyl gellan gum doesn't appear to be widely used. However, the Subcommittee acknowledged the material is relatively new to the National List—added in 2020—and determined it is essential as it performs unique functions that other gums do not provide.
<a href="#">Ozone</a>	Unanimous vote to renew	
<a href="#">Sodium hydroxide</a>	Unanimous vote to renew	
<a href="#">Carnauba wax</a>	Unanimous vote to renew	1. What is the current organic availability of carnauba wax?
<a href="#">Inulin-oligofructose enriched</a>	Unanimous vote to renew	
<a href="#">Orange shellac</a>	Unanimous vote to renew	

### Other topics of interest to Handling community

- Parties might be interested in these topics found elsewhere on this agenda: [Risk-based Certification](#), [Research Priorities](#), [Residue Testing for a Global Supply Chain: § 205.671](#), [Residue Testing for a Global Supply Chain: Regulation Review \(§205.670 & UREC\)](#), and [eCommerce Organic Labeling Requirements](#).

### LIVESTOCK

#### TO BE VOTED ON

#### Proposals

- [Oxytocin Annotation Proposal](#) – proposes to clarify the current annotation for oxytocin to reflect the intention of the listing to limit its use in post parturition therapeutic applications. The annotation as written

Click here to  
email OTA  
feedback

has sometimes been understood by operations and certifiers to allow the routine use of the substance and for longer than needed. Find the [full proposal here](#).

Motion to amend the annotation of oxytocin to read: “for use in post-parturition therapeutic applications within 3 days after birth. It may not be administered to increase an animal’s milk production or for milk letdown.”

**5 Yes**, 0 No, 0 Abstain, 2 Absent

## FOR INFORMATION GATHERING

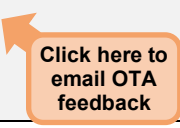
Click here to  
email OTA  
feedback

### Discussion Documents

- [Chlorine Materials](#)** – addresses a petition to clarify whether the use of chlorine materials are allowed for direct treatment of livestock drinking water. There is inconsistency in determining compliance with the use of chlorine. Some policies understand the listing of chlorine materials at § 205.603(a)(10) to allow for direct livestock drinking water treatments as long as the final drinking water meets Safe Drinking Water Act (SDWA) standards. Other policies interpret the annotation to limit the use of chlorine materials to disinfection of facilities and equipment.  
The Subcommittee poses six questions to aid in its understanding of the issue and inform its decision in a subsequent proposal. Find the [full discussion here](#).
- [Integrating Livestock and Agroforestry Crops](#)** – explores the use of animals in perennial tree cropping systems, the food safety aspects of this practice, and how pre-harvest intervals in the USDA organic regulations may be amended to allow for grazing of animals while addressing food safety concerns.  
The Subcommittee poses three questions to aid in understanding the needs of growers, the factors that must be considered when addressing pre-harvest intervals, and solicits information about effectiveness of post-harvest treatments to reduce pathogen levels. Find the [full discussion here](#).

## SUNSET REVIEWS

Helpful Links: [OTA Livestock Sunset Summaries](#) | [NOSB Livestock Sunset Reviews](#)

MATERIAL	SUBCOMMITTEE VOTE	SUBCOMMITTEE QUESTIONS/COMMENTS
<a href="#">Butorphanol</a> 	Unanimous vote to renew	1. In what circumstances is Butorphanol commonly used on organic livestock operations? 2. Is the pain relief material toolbox for managing pain in surgical applications sufficient?
<a href="#">Flunixin</a>	Unanimous vote to renew	
<a href="#">Magnesium hydroxide</a>	Unanimous vote to renew	
<a href="#">Oxytocin</a>	Unanimous vote to renew	The Subcommittee considered a previous Board’s recommendation to remove, the continued need expressed by some producers for oxytocin to address postpartum issues, and the prohibition some dairy processors have on the substance to substantiate a “no synthetic hormone” claim. In balancing these considerations, the Board supports the continued listing.
<a href="#">Poloxalene</a>	Unanimous vote to renew	1. Are there any non-synthetic, approved, and effective bloat remedies for ruminants that are commercially available to ranchers?
<a href="#">Formic acid</a>	Unanimous vote to renew	1. Are the options for controlling Varroa mites in beehives sufficient or redundant?

MATERIAL	SUBCOMMITTEE VOTE	SUBCOMMITTEE QUESTIONS/COMMENTS
		2. Are there natural ways to combat mites that could reduce the dependency on parasiticides?
<a href="#">Sucrose octanoate esters (SOEs)</a>	Unanimous vote to renew	<p>The Subcommittee considered a variety of comments in favor of and opposed to continued listing of SOEs. An absence of significant public comments from any users of the substance is attributed to the fact that most organic apiculture production occurs outside the U.S., and these stakeholders are not aware of the NOSB process. The Subcommittee also considered comments in support of continued listing if the NOP developed apiculture-specific standards, which are not currently part of the USDA organic regulations.</p> <p>On balance, the Subcommittee supports the continued listing.</p> <p>1. Is there current information on the use of SOE formulations by farmers? Is there a large demand for SOE formulations by livestock producers?</p>
<a href="#">EPA List 4 Inerts</a>	Unanimous vote to renew	The Subcommittee weighed divided comments from the Spring meeting but acknowledges the ongoing efforts of the NOP to replace the reference to this outdated listing. In consideration of this continued effort, and to maintain continuity in pesticide formulations, the Subcommittee supports the continued listing.
<a href="#">Excipients</a>	Unanimous vote to renew	The Subcommittee supports the continued listing of excipients but has interest in addressing the annotation as written to ensure the references therein continue to meet OFPA criteria.
<a href="#">Strychnine</a>	Unanimous vote to renew	

#### Other topics of interest to livestock community:

- Parties might be interested in these topics found elsewhere on this agenda: [Risk-based Certification](#), [Research Priorities](#), [Residue Testing for a Global Supply Chain: § 205.671](#), [Residue Testing for a Global Supply Chain: Regulation Review \(§205.670 & UREC\)](#) and [Consistency in Organic Seed Use](#).

## CROPS

### TO BE VOTED ON

Click here to email OTA feedback

#### Proposals

- [Pear Ester](#) – in response to a petition, proposal to add pear ester to the National List at § 205.601 as a synthetic substance allowed for use in organic crop production. Pear ester has been in use in organic production as an allowed pest management tool in orchard crops (apple, pear, walnut) to control codling moth and was previously grouped with pheromones, a group of allowed synthetic substances already listed at § 205.601. However, grouping pear ester with pheromones was found to be incorrect, and the proper classification of this substance is as a kairomone, which are chemical signals produced by plants or other organisms that are detected by a distinct species, often insects. Because it has been an established pest management tool to date, and because there was confusion regarding its classification that it is not a pheromone, pear ester continues to be allowed for use as the NOSB reviews this material.

In a discussion document considered at the Spring meeting, the Subcommittee sought additional information regarding the toxicity of the substance to fish and aquatic invertebrates. While a motion to add pear ester to the National List is proposed, the subcommittee seeks any additional or new research-based information on any negative environmental or human health impacts. Find the [full proposal here](#).

Motion to add pear ester to the National List at § 205.601(f) with the following annotation: use of pear ester is limited to passive traps/monitors and not for use in microencapsulated formulations.

**5 Yes**, 0 No, 0 Abstain, 2 Absent

- [Synthetic Compostable Polymers](#) – proposal responds to a petition requesting a broad allowance of ASTM-certified compostable synthetics as compost feedstocks. Weighing such an allowance against Organic Foods Production Act criteria, evaluation of a technical report on compostable synthetics, and public comment received, the subcommittee finds that such a broad allowance is inconsistent with the requirements and intent of the organic standards. The Subcommittee concludes “the class of materials referred to is too vast (from a chemical composition standpoint), lacks regulatory coherence for functional references, and contains the potential for human and environmental impacts.” As noted in previous Board discussion, the Subcommittee notes any synthetic substance should be evaluated through the existing process to add a substance to the National List. Find the [full proposal here](#).

The Subcommittee recommends denial of the petition in its current form and proposes the following three motions.

**Definition Motion:** Motion to define Compostable Materials as Compostable Materials. Materials meeting compostability specifications ASTM D6400-21, D6868-21, or D8410-21 used for making compost.

**5 Yes**, 0 No, 0 Abstain, 2 Absent

**Classification Motion:** Motion to classify Compostable Materials as synthetic.

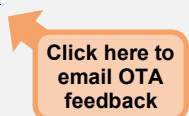
**5 Yes**, 0 No, 0 Abstain, 2 Absent

**National List Motion:** Motion to add Compostable Materials at 205.601(c) – as compost feedstocks

**5 Yes**, 0 No, 0 Abstain, 2 Absent

## SUNSET REVIEWS

Helpful Links: [OTA Crop Sunset Summaries](#) | [NOSB Crop Sunset Reviews](#)

MATERIAL	SUBCOMMITTEE VOTE	SUBCOMMITTEE QUESTIONS/COMMENTS
<a href="#">Fatty alcohols</a> 	<b>Significant to remove</b>	<p>The Subcommittee is divided in its support of this listing as some recent research in the production of fatty alcohols includes the use of excluded methods. It is unclear if any of these production methods are commercially available at this time. The Subcommittee also noted that viable alternatives such as soybean or mineral oil may be viable. Two questions were posed to stakeholders to inform the Board’s decision.</p> <ol style="list-style-type: none"> <li>1. Are alternative products available to effectively de-sucker tobacco?</li> <li>2. Is it possible to ensure that fatty alcohol products are not produced with excluded methods?</li> </ol>
<a href="#">Potassium hypochlorite</a>	<b>Unanimous vote to renew</b>	<ol style="list-style-type: none"> <li>1. Are there any instances in which the substance is used at concentrations that exceed maximum limits spelled out in the Safe Drinking Water Act?</li> </ol>
<a href="#">Soap-based algicide/demossers</a>	<b>Unanimous vote to renew</b>	
<a href="#">Ammonium carbonate</a>	<b>Unanimous vote to renew</b>	<ol style="list-style-type: none"> <li>1. Is there any new research that describes the effects of ammonium carbonate baits on non-target insect species?</li> </ol>

MATERIAL	SUBCOMMITTEE VOTE	SUBCOMMITTEE QUESTIONS/COMMENTS
<a href="#">Soaps, insecticidal</a>	Unanimous vote to renew	
<a href="#">Sucrose octonate esters (SOEs)</a>	Unanimous vote to renew	<p>The Subcommittee considered a variety of comments in favor of and opposed to continued listing of SOEs. The Subcommittee also considered the Board's 2018 vote to remove SOEs, which was based on there not being any EPA registered pesticides containing SOEs. The listing was retained by NOP as a product was registered between the Board's vote and rulemaking. On balance, the Subcommittee finds justification to retain this listing at this time.</p> <ol style="list-style-type: none"> <li>Are there EPA-registered products formulated using SOEs?</li> <li>Is there current information on the need and use of SOE formulations in crop production?</li> <li>Is there a need to keep SOEs in the crops toolbox to be rotated with other products?</li> </ol>
<a href="#">Vitamin D3</a>	Unanimous vote to renew	
<a href="#">Aquatic plant extracts</a>	Unanimous vote to renew	<p>The Subcommittee considered stakeholder interest in updating the annotation limiting the solvent amount needed for extraction. Material review organizations and input manufacturers noted there is no advantage to over utilizing potassium hydroxide solvents to increase potassium content. The Subcommittee also considered comments suggesting changes to the "other than hydrolyzed" language in the annotation that could provide clarity in the review of these substances. The Subcommittee opted not to bring forward parallel annotation amendments at this time.</p>
<a href="#">Lignin sulfonate</a>	Unanimous vote to renew	
<a href="#">Sodium silicate</a>	Unanimous vote to renew	
<a href="#">EPA List 4 Inerts</a>	Unanimous vote to renew	<p>The Subcommittee weighed divided comments from the Spring meeting but acknowledges the ongoing efforts of the NOP to replace the reference to this outdated listing. In consideration of this continued effort, and to maintain continuity in pesticide formulations, the Subcommittee supports the continued listing.</p>
<a href="#">Paper - production aids; paper-based crop planting aids</a>	Unanimous vote to renew	<p>The Subcommittee considered the requirement that paper production aids contain 60% cellulose fiber prevents these products from being completely made of biobased, non-degradable plastics, but that it allows current products on the market. Similarly, requiring 80% biobased content prevents the use of products made primarily from petroleum products. While the Subcommittee expressed interest in these percentages increasing over time, it acknowledged that this is not feasible at this time.</p> <ol style="list-style-type: none"> <li>Do certain crops or certain farming practices benefit more the use of paper pots instead of traditional transplants?</li> <li>Is this material necessary?</li> <li>Is the testing for unintentional PFAS contaminants feasible for paper pots?</li> </ol>
<a href="#">Arsenic</a>	Unanimous vote to renew	
<a href="#">Strychnine</a>	Unanimous vote to renew	

#### Other topics of interest to crops community:

- Parties might be interested in these topics found elsewhere on this agenda: [Risk-based Certification](#),



---

## OTHER TOPICS INCLUDING COMPLIANCE, ACCREDITATION AND CERTIFICATION (CACS); MATERIALS

### TO BE VOTED ON

Click here to  
email OTA  
feedback

#### Proposals

- **[Risk-based Certification](#)** – proposal continues the discussion around using a risk-based approach to prevent fraud and protect organic integrity, while also seeking to avoid overburdening operations with increased costs or operational complexity for low-risk operations when risk-based measures are implemented. To this end, the Subcommittee proposes a common set of definitions to consistently understand what is meant by risk, risk management, risk-based oversight, and other terms in relation to risk-based certification. Also proposed is the use of NOP-issued guidance and/or instruction to certifiers to establish a baseline set of common risk criteria that also allows for flexibility to adapt to the unique and varied operational realities of the organic industry. Further, the Subcommittee proposes that NOP—in collaboration with stakeholders in the organic industry—develop a process and matrix to address risk in flexible ways that use critical thinking to evaluate a diversity of operations with differing risk levels. Finally, the Subcommittee proposes the development and revision of resources and training materials to support risk-based approaches to certification. Find the [full proposal here](#).

Motion to accept the proposal on risk-based certification

**5 Yes**, 0 No, 0 Abstain, 1 Absent

- **[Residue Testing for a Global Supply Chain: § 205.671](#)** – proposal continues consideration of residue testing from the Fall 2024 and Spring 2025 meetings, while breaking the topic up into discreet areas. This proposal identifies the lack of clarity on whether the detection of an intentional prohibited material application can or should dictate when a product or crop is excluded from sale as organic per § 205.671 *Exclusion from organic sale*. To provide clarity and consistency, the Subcommittee proposes a revision of the regulation to require exclusion from organic sale when a prohibited substance is intentionally applied. The Subcommittee reasons that such a revision is aligned with Section 6511 of the Organic Foods Production Act which provides for “removal of the organic label” when a residue is the result of the intentional application of a prohibited substance.

Currently, the regulation only provides for an exclusion from sale when the residue exceeds FDA action levels or 5% of EPA tolerances. A proposed change to the regulation would provide for an exclusion from sale for any intentional application of a prohibited substance regardless of FDA action level or EPA tolerance. Find the [full proposal here](#).

Motion to accept the proposal

**5 Yes**, 0 No, 0 Abstain, 1 Absent

- **Research Priorities 2025** – proposal presents the Board’s annual list of research priorities for organic food and agriculture. With this year’s priorities, the Board had categorized topics by highest priority while also including ongoing topics. Also added is a new category titled “Interdisciplinary,” an acknowledgement of public comments that voiced the need for topics that covered multiple sectors. Included in these interdisciplinary topics is the identification of barriers producers face in their transition to organic





production. This is an area OTA is actively engaged in as a lead partner in the USDA's Transition to Organic Partnership Program (TOPP). [Learn more about our work](#) and its three program areas (Market Development Technical Assistance, Supplier/Buyer Discovery Facilitation, and Handler Transition Training and Education). Find the [full proposal here](#).

**Motion to accept the proposal**

**7 Yes**, 0 No, 0 Abstain, 1 Absent

- **[Policy and Procedures Manual \(PPM\) Revision](#)** – proposal addresses participation expectations of Board members and authorizes the NOSB Chair to request the Secretary remove Board members for extreme non-participation; clarifies that 3<sup>rd</sup> party technical reviews be conducted for all newly petitioned substances and narrows the exception to this when existing information and expertise can be used instead; clarifies process for annotation change proposals at sunset review; and provides minor wording updates. Find the [full proposal here](#).

**Motion to accept the proposal**

**4 Yes**, 0 No, 0 Abstain, 1 Absent

## FOR INFORMATION GATHERING

### Discussion Documents

- **[Residue Testing for a Global Supply Chain: Regulation Review \(§205.670 & UREC\)](#)** – continues a discussion started at the Spring 2025 meeting that explores aspects of §205.670 of the USDA organic regulations, which addresses the inspection and testing of agricultural products sold with an organic claim. The discussion also looks at the definition of unavoidable residual environmental contamination (UREC). The Subcommittee breaks the discussion into five subject areas and how the regulation may be revised to better reflect the operational realities of the organic industry as it stands today, and sharpen residue testing as a tool for detecting and preventing fraud.

The five topic areas the Subcommittee explores are:

1. **Mandated testing of a minimum of 5% of operations annually by certifiers**  
Looks at a regulatory revision that requires certifiers use a risk-based approach to sampling and testing vs. the current allowance to select operations at random.
2. **Certifiers conducting all testing at their own expense**  
Looks to clarify when a certifier can pass residue testing costs on to operations, and how this might positively balance costs and testing to operations that carry a higher risk vs. those that do not.
3. **Public access to residue testing results**  
Considers linking the two sections of the regulation that address making results available to the public to provide clarity regarding this access. Also explores the use of a central database as a means of compiling and providing access to these results.
4. **Downstream notification of noncompliant organic product to buyers**  
Explores revision to the regulation that would require downstream notification of positive residue findings to remove noncompliant products from the market, while ensuring there are clear processes, responsibilities, and expectations when this notification is made.

Click here to  
email OTA  
feedback



## 5. Unavoidable residual environmental contamination (UREC)

Looks to improve the response to UREC findings, which often trigger investigations in response to low incidences of a substance despite an organic operation implementing preventive practices. This improvement would come from clarifying through guidance a certifier's response to trace residues and consideration of regionally specific factors when determining what constitutes "unavoidable" contamination.

The discussion document poses a number of questions to further inform and direct the Subcommittee's work on this topic. Find the [full discussion here](#).

- **[Consistency in Organic Seed Use](#)** – continues a discussion that seeks to identify strategies for increasing the amount and variety of commercially available organic seed and its use. This document focuses on barriers to organic seed production by looking at factors such as the length of time it takes to develop an organic seed variety, market uncertainty and risk, the complexity and cost of certification, the increased space and land requirements it takes to produce organic seed, and the challenge of access to seed genetics. The Subcommittee poses two questions to stakeholders to determine other challenges to organic seed production and seeks input on solutions that could lower the barriers to organic seed production. Find the [full discussion here](#).

[OTA's Organic Seed Task Force](#), which includes seed producers, annual and perennial organic growers, organic certifiers, and others in the seed sector has been very active and engaged on this topic in the last year, meeting monthly to address these challenges. The Task Force is exploring different models, challenging assumptions, and asking questions to develop new roadmaps for organic seed and planting stock usage. We look forward to informing the Subcommittee's discussion in our comments this Fall.

- **[eCommerce Organic Labeling Requirements](#)** – opens a discussion in response to a petition to the NOP to amend the USDA organic regulations to require online retailers/resellers to provide a visible image of a packaged organic product's information panel or a statement identifying the organic certifier of the product on the seller's webpage. The Subcommittee addresses how the Organic Foods Production Act, the USDA organic regulations, and FDA labeling requirements apply to digital platforms and e-commerce labeling. The Subcommittee concludes it is within the regulatory authority of USDA to establish marketing and labeling requirements for the sale of certified organic products through e-commerce platforms, both certified and exempt operations.

Implementing these requirements is not without its challenges, especially as they apply to the sale of fresh organic produce, which varies by season and supplier and when in unpackaged form does not require a "certified organic by..." certifier statement.

The Subcommittee poses a number of questions to explore the feasibility of implementing additional regulatory requirements. Find the [full discussion here](#).

- **[Excluded Methods – Induced Mutagenesis](#)** – continues the discussion initiated in Fall 2024 on the compatibility of induced mutagenesis (IM) methods with organic production. Public comments in response to the first discussion was varied, with some agreeing that exposing plant materials to toxic chemicals and radiation is not consistent with organic principles. Others, however, expressed concern about losing or restricting access to existing and future varieties developed through IM methods. This discussion presents the following three recommendation scenarios and seeks to understand any impacts these may present.
  1. IM is an excluded method
  2. IM is not an excluded method

3. IM is not an excluded method, but should be restricted

The Subcommittee presents six questions to explore what the impacts would be along with requesting feedback on the process and approach the NOSB is taking with this topic. Find the [full discussion here](#).

- **Sunset Review Efficiency** – continues discussion initiated at the Spring 2025 meeting to review substances up for sunset review that 1) have widespread support for relisting and 2) where there is no new information suggesting that the products (*substances*) do not comply with National List criteria. At the Spring meeting, members indicated the eligibility of a sunset substance to be considered in a grouped review.

After consideration of the proposed sunset review efficiency process, the Subcommittee decided that the potential time savings is not worth the potential confusion among Board members related to the voting procedure, and the potential for reduced transparency of the voting process among stakeholders. Find the [full discussion here](#).

---

## PRESENTATIONS AND PANELS

- **USDA/AMS/National Organic Program Update, and NOP** – Dr. Jennifer Tucker and staff members of the AMS/NOP will provide an update on program operations and topics.
- **Plains Transition to Organic Partnership Program (TOPP) Presentations** – Members of the [Plains TOPP program](#), led by Organic Crop Improvement Association, will present on their activities.

---

## DEFINITIONS

NOSB conducts its business via a few types of documents and actions described below.

- **Proposal:** This is a formal recommendation to be voted on and could be a petitioned material, a proposed change to the standards or a more general recommendation to the USDA. It takes a two-thirds vote of NOSB members present to pass.
- **Sunset Review:** NOSB is required to re-evaluate materials currently on the National List of Allowed and Prohibited Substances every five years to determine if new information indicates they are harmful to human health or the environment, are not necessary because natural or organic alternatives are available, and/or incompatible with organic production. It takes a two-thirds vote of NOSB members present to pass a recommendation to delist (No votes = a recommendation to remain listed).
- **Discussion Document:** This is a document that outlines NOSB's work and thoughts on a particular issue. Often questions are included to solicit feedback from stakeholders. These items are not typically voted on.