# SPRING 2026 NOSB MEETING

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

The spring 2026 National Organic Standards Board (NOSB) Meeting will be held May 12-14. 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. Virtual oral comment webinars will occur on May 5 & 7 in advance of the in-person meeting; in-person comments will be heard by the Board in the afternoon of its first day, May 12. While OTA will be submitting comments, we encourage you to submit your own comments on the issues that affect your business. The deadline to sign up for virtual and in-person oral comments is April 27, 2026. The deadline to submit written comments is Monday, May 4, 2026. Visit OTA's NOSB resource page for more information.

### QUICK REFERENCE



### 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.

**While comments are due to NOP by May 4, please submit your feedback to OTA using the email links in this document by Wednesday, April 29, so we can incorporate them into our comments to the Board.**

### SUNSET REVIEW OVERVIEW

Each spring, NOSB begins its review of substances on the National List that are scheduled to sunset in two years' time; the group of substances under review this year is scheduled to sunset in 2028. This advance review allows the Board to complete its review and forward recommendations to the NOP, and allows NOP to complete rulemaking to retain or sunset a substance before its sunset date.

**IMPORTANT**: Votes to determine whether these substances remain on the National List will take place at the fall 2026 meeting. The spring meeting is the ideal time to provide feedback to the Board and inform their decision in the fall and it allows the Board ample time to seek additional feedback and information.

OTA has compiled Sunset Summaries for Livestock, Crop, and Handling 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
- Public comments from the last sunset review
- Board vote at last sunset review (**unanimous vote to renew**, **majority vote to renew**, or **significant/divided vote to remove**)
- Subcommittee questions to stakeholders

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.

## PRESENTATIONS AND PANELS

- **USDA/AMS/National Organic Program Update, and NOP-NOSB Q&A** – Deputy Administrator Dr. Jennifer Tucker and NOP Standards Division Director Erin Healy will provide an update on program operations and topics.
- **West/Southwest Transition to Organic Partnership Program (TOPP) Presentations** – Members of the Plains TOPP program will present on their activities.
- **Expert Panel: Organic Seed Use (Virtual)** – Prior to providing a verbal update on their ongoing work regarding their ongoing work agenda item Consistency in Organic Seed Use, the Board will host a virtual expert panel on organic seed.

## LIVESTOCK

**Proposals TO BE VOTED ON**

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- **Chlorine Materials (petition)** – 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.

  In light of petition information, evaluation of public comments, and published literature and studies of chlorine use in the production of organic livestock, the Subcommittee proposes an amendment allowing treatment of livestock drinking water with chlorine. A proposed annotation limits residual chlorine levels to SDWA levels as is found in other chlorine listings. Find the full proposal here.

  **Motion to amend chlorine at 7 CFR 205.603(a)(10) as follows:**
  (10) Chlorine materials—disinfecting and sanitizing facilities, ~~and~~ equipment, and livestock drinking water. Residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.

  Subcommittee vote: **5 Yes**, 0 No, 0 Abstain, 0 Absent

ORGANIC TRADE ASSOCIATION

**SUNSET REVIEWS** (5-year review cycle)

**Livestock Sunset Summaries** – refer to this document for a summary of use, OTA draft position, public comments from last sunset review, and the Board vote at last sunset review. This is the Board's first review of the sunset materials. Comments received during the spring and fall comment periods will inform a vote by the Board at its fall meeting.

| MATERIAL | BOARD VOTE AT LAST REVIEW | SUBCOMMITTEE QUESTIONS |
|---|---|---|
| Activated charcoal | Unanimous vote to renew | 1. Are any ancillary ingredients used in veterinary activated charcoal products?<br>2. Is activated charcoal used in organic animal feed mixes? |
| Calcium borogluconate | Unanimous vote to renew | Is the listing of calcium borogluconate (and calcium propionate) redundant with electrolytes or is it necessary to keep them listed separately to assure allowance as administered as an IV? |
| Calcium propionate | Unanimous vote to renew | Is this listing redundant with electrolytes and nutritive supplements? |
| Chlorine materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid – generated from electrolyzed water, Sodium hypochlorite) | Unanimous vote to renew | 1. Additional information and perspectives are needed from various stakeholders on the stated health and environmental impact of chlorine materials.<br>2. Are there specific procedural or processing steps that reduce the health and environmental risks associated with the use of chlorine materials in livestock production? |
| Kaolin pectin | Unanimous vote to renew | |
| Mineral oil | Unanimous vote to renew | |
| Nutritive supplements | Unanimous vote to renew | Do the current restrictions on injectable nutritive supplements pose any challenges to producers in accessing the therapies they need to treat their livestock? |
| Propylene glycol | Unanimous vote to renew | Do stakeholders have concerns about excluded methods in the manufacture of propylene glycol, or should additional clarification or annotation be considered to ensure continued compliance with organic standards? |
| Sodium chlorite, acidified | Unanimous vote to renew | Is lactic acid in use as a teat dip by livestock producers? |
| Zinc sulfate | Unanimous vote to renew | Are livestock producers using less copper sulfate by substituting zinc sulfate for foot rot management? |

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## FOR INFORMATION SHARING

- **Integrating Livestock and Agroforestry Crops** –

  A verbal update on this previously discussed topic, which explores the use of animals in perennial tree cropping systems, will be presented.

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

Parties might be interested in these topics found elsewhere on this agenda: Residue Testing for a Global Supply Chain: Regulation Review, e-Commerce, Research Priorities, Sunset Review Efficiency

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## CROPS

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**Proposals TO BE VOTED ON**

- **Pear ester** – addresses a petition to add pear ester to the National List at § 205.601(f) 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 coddling 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 response to human health concerns from formulations involving microencapsulation, the Crops Subcommittee opted for a listing annotation that prohibits the use of microencapsulated formulations. Find the full proposal here.

  **Motion to classify pear ester as synthetic:**

  Subcommittee vote: **6 Yes**, 0 No, 0 Abstain, 1 Absent

  **Motion to add pear ester to the National List at §205.601(f) with the following annotation: Microencapsulated formulations prohibited.**

  Subcommittee vote: **6 Yes**, 0 No, 0 Abstain, 1 Absent

**SUNSET REVIEWS** (5-year review cycle)

**Crop Sunset Summaries** – refer to this document for a summary of use, OTA draft position, public comments from last sunset review, and the Board vote at last sunset review. This is the Board's first review of the sunset materials. Comments received during the spring and fall comment periods will inform a vote by the Board at its fall meeting.

| MATERIAL | BOARD VOTE AT LAST REVIEW | SUBCOMMITTEE QUESTIONS |
|---|---|---|
| Copper sulfate | Majority vote to renew | 1. How do certifiers verify compliance with this annotation? |

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| MATERIAL | BOARD VOTE AT LAST REVIEW | SUBCOMMITTEE QUESTIONS |
|---|---|---|
| | | 2. Are there practical alternatives for algae and tadpole shrimp management in paddy rice?<br>3. Are there practical methods to remediate high soil copper levels?<br>4. What are common organic rice rotations? Is rice ever grown in successive years?<br>5. If so, is copper sulfate allowed to be applied to rice in successive years, alternating control of algae and tadpole shrimp? |
| Chlorine Materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid - generated from electrolyzed water, Potassium hypochlorite - for use in water for irrigation purposes, Sodium hypochlorite) | Unanimous vote to renew | |
| Ozone gas | Unanimous vote to renew | |
| Peracetic acid | Unanimous vote to renew | |
| Magnesium oxide | Unanimous vote to renew | 1. Are there any commercially available nonsynthetic or less-processed alternatives that can perform the same viscosity-control function for liquid humates as magnesium oxide? If so, please describe their availability, performance, and limitations.<br>2. Is magnesium oxide still necessary for its currently approved use in organic crop production? |
| EPA List 3 Inerts | Unanimous vote to renew | |
| Calcium chloride | Unanimous vote to renew | |
| Rotenone | Unanimous vote to renew | |

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

Parties might be interested in these topics found elsewhere on this agenda: Residue Testing for a Global Supply Chain: Regulation Review, e-Commerce, Research Priorities, Sunset Review Efficiency

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## HANDLING

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**Proposals TO BE VOTED ON**

- **Chitosan - Petitioned Substance** – petition to classify chitosan, as derived from fungi, as a nonsynthetic and add to the National List at § 205.605(b) as a nonagricultural (nonorganic) allowed substance. The petitioner highlights use as processing aid in winemaking as a clarifier, filter, to remove volatile aromas, and provide microbial stability. After its review, the Handling Subcommittee found the chemical deacetylation methods used in the production and processing of chitosan deem it be classified as synthetic according to the Decision Tree for Classification of Materials as Synthetic or Nonsynthetic (NOP 5033-1).

  Further, the Subcommittee found sulfur dioxide, a substance currently listed as allowed, sufficiently meets the needs for which chitosan is petitioned, and an alternative is not essential to organic production.

  Find the full proposal here.

  **Motion to classify chitosan as petitioned as synthetic:**

  Subcommittee vote: **4 Yes**, 0 No, 0 Abstain, 0 Absent

  **Motion to add chitosan as petitioned to the National List, § 205.605(b):**

  Subcommittee vote: 0 Yes, **4 No**, 0 Abstain, 0 Absent

- **Sodium Bicarbonate Classification** – proposal comes in response to the Handling Subcommittee's finding that the current nonsynthetic classification does not accurately reflect the commercially available forms of sodium bicarbonate in use today. The Subcommittee proposes to add a listing for synthetic sodium bicarbonate to § 205.605(b), but limit this listing solely to sodium bicarbonate produced via the trona process. Find the full proposal here.

  **Motion to classify sodium bicarbonate extracted from nahcolite deposits as nonsynthetic:**

  Subcommittee vote: **5 Yes**, 0 No, 0 Abstain, 3 Absent

  **Motion to classify sodium bicarbonate produced from sodium carbonate (e.g. Solvay and trona ore) as synthetic:**

  Subcommittee vote: **5 Yes**, 0 No, 0 Abstain, 3 Absent

  **Motion to add synthetic "sodium bicarbonate – produced via trona ore processing only" to 7CFR 205.605(b):**

  Subcommittee vote: **5 Yes**, 0 No, 0 Abstain, 3 Absent

## SUNSET REVIEWS (5-year review cycle)

**Handling Sunset Summaries** – refer to this document for a summary of use, OTA draft position, public comments from last sunset review, and the Board vote at last sunset review. This is the Board's first review of the sunset materials. Comments received during the spring and fall comment periods will inform a vote by the Board at its fall meeting.

ORGANIC TRADE ASSOCIATION

| MATERIAL | BOARD VOTE AT LAST REVIEW | SUBCOMMITTEE QUESTIONS |
|---|---|---|
| Carrageenan   | Significant vote to remove | 1. Which organic products and uses currently rely on carrageenan?<br>2. What type of carrageenan (semi-refined / refined) and forms (kappa-, iota-, or lambda-) are being used in organic products?<br>3. Are carrageenan alternatives available to replace all uses?<br>4. Are there feasible methods to produce carrageenan as a non-synthetic (according to NOP 5033-1)?<br>5. Are there any concerns about ancillary ingredients used with carrageenan?<br>6. What restrictions or annotations might be appropriate for carrageenan? What new science on the safety or human health effects has emerged? |
| Agar-agar | Unanimous vote to renew | 1. What form(s) (nonsynthetic or synthetic) of agar-agar are currently in use in organic products?<br>2. Is agar-agar commonly used in organic products? |
| Animal enzymes | Unanimous vote to renew | 1. What is the feasibility of producing animal enzymes from organic livestock? What would be barriers?<br>2. Are there any concerns regarding source materials from non-organic sources?<br>3. What challenges do certifiers encounter when verifying the origin and compliance of animal derived enzymes?<br>4. What is the environmental impact of animal derived enzymes vs. microbial/fermentation based alternatives?<br>5. Are all of the animal enzymes listed necessary and being used in organic production? |
| Calcium Sulfate - mined | Unanimous vote to renew | 1. Are there any alternative coagulants or processing aids that could replace calcium sulfate without compromising quality or organic principles?<br>2. Are there specific applications where calcium sulfate is essential versus optional?<br>3. How would limiting or restricting its use impact your production processes or product offerings? |
| Glucono delta-lactone | Unanimous vote to renew | 1. How widespread is the use of GDL in organic applications?<br>2. Is there evidence that GDL being used in organic applications may derive from genetic modification of any kind?<br>3. Have alternatives to GDL emerged in recent years that deliver the same product quality and functionality?<br>4. Is the lack of international acceptance significant?<br>5. How is organic silken tofu produced in the EU, Japan, etc. without the use of GDL? |
| Tartaric acid | Unanimous vote to renew | 1. Is organic tartaric acid available in significant quantities?<br>2. Can tartrate salts be removed from wine made from organic grapes prior to addition of sulfur dioxide?<br>3. Are there other barriers to production of organic tartaric acid that could be lowered? |

ORGANIC TRADE ASSOCIATION

| MATERIAL | BOARD VOTE AT LAST REVIEW | SUBCOMMITTEE QUESTIONS |
|---|---|---|
| Cellulose   | Unanimous vote to renew | 1. For which products, if any, is cellulose currently essential for organic handling?<br>2. Which ancillary substances are used with cellulose, for the three allowable uses in handling (filtration, anti-caking, and regenerative casings)?<br>3. Is it still necessary to allow cellulose with ancillary substances, given that versions with no ancillaries are available? |
| Chlorine materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid – generated from electrolyzed water, Sodium hypochlorite) | Unanimous vote to renew | 1. What alternatives are being used to chlorine materials?<br>2. Are all chlorine materials needed for handling purposes?<br>3. What ancillary substances are being used in chlorine materials?<br>4. Are clarifications of uses sufficiently clear in NOP 5026?<br>a. Active ingredients vs. all ingredients<br>b. Differing review policies<br>c. Where a sanitizer is used and reviewed. Direct contact versus non-food contact |
| Potassium hydroxide | Unanimous vote to renew | 1. For which organic products or processes do you currently use potassium hydroxide, and what functional role does it serve?<br>2. Are heat or mechanical methods not sufficient for peach peeling? Are there alternatives? |
| Potassium lactate | Unanimous vote to renew | 1. Are there any new technologies or ingredients that could replace the lactates?<br>2. What applications are Potassium and Sodium Lactate used in conjunction? |
| Silicon dioxide | Unanimous vote to renew | 1. What is your understanding of the current listing of silicon dioxide in regards to engineered nanomaterials? Does the current listing allow silicon dioxide as an engineered nanomaterial since the substance is synthetic and their prohibition is not specified in the annotation? Or are they prohibited? Explain your rationale.<br>2. Should the Subcommittee consider annotating to:<br>a. Only allowed synthetic amorphous silica (SAS)?<br>b. Only require the use of organic rice hulls when commercially available for products labeled “organic” and not for products labeled as “made with organic?”<br>3. The 2025 TR lists several alternatives (both nonagricultural, nonsynthetic and organic agricultural). Do you have experience in using any of these alternatives to silicon dioxide? If so, please explain the alternative used and specific function. |
| Sodium lactate | Unanimous vote to renew | 1. Are there any new technologies or ingredients that could replace the lactates?<br>2. What applications are potassium and sodium lactate used in conjunction with? |

**Other topics of interest to Handling community**

Parties might be interested in these topics found elsewhere on this agenda: Residue Testing for a Global Supply Chain: Regulation Review, e-Commerce, Research Priorities, Sunset Review Efficiency

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## OTHER TOPICS: COMPLIANCE, ACCREDITATION AND CERTIFICATION | MATERIALS | POLICY DEVELOPMENT

### TO BE VOTED ON

Click here to email OTA feedback

**Proposals**

- **Residue Testing for a Global Supply Chain: Regulation Review (§205.670 and UREC)** – proposal concludes the Board's significant work on residues and testing, and suggests the following four areas of revision to the regulation at § 205.670, as well as an update to NOP Instruction 2613 *Responding to Results from Pesticide Residue Testing*.

  1. **Mandated testing of a minimum of 5% of operations annually by certifiers**

     Recommends 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**

     Recommends allowing certifiers to charge operations tested when the test is part of a credible complaint or investigation, and when contamination is determined to be caused by an intentional application of a prohibited substance or when it fails to adhere to its Organic System Plan.

  3. **Public access to residue testing results**

     Recommends linking the two sections of the regulation that address making results available to the public to provide clarity regarding this access. Encourages 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**

     Recommends revision to the regulation that would require downstream notification of positive residue findings to remove noncompliant products from the market, but only when residues exceed action thresholds, e.g., >5% of EPA tolerances, or a willful violation has occurred. Subcommittee recommends the NOP use the Advanced Notice of Proposed Rulemaking (ANPR) process to draw further stakeholder feedback and determine feasibility of this recommendation.

  5. **Unavoidable residual environmental contamination (UREC)**

     Encourages NOP implement NOSB's Spring 2025 recommendation to update NOP Instruction 2613 *Responding to Results from Pesticide Residue Testing* to provide certifiers clearer direction when residues are detected for which there is no EPA tolerance or FDA action level, and when contamination is the result of indirect, unintentional applications of unknown origin.

  Find the full proposal here.

  **Subcommittee vote to accept proposal:**

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

- **e-Commerce Organic Labeling Requirements** – proposal 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 do or do not apply to digital platforms and e-commerce labeling. The Subcommittee highlights recent indications by FDA that labels of regulated products referencing a website may deem those websites an extension of the label itself. In light of this, the Subcommittee recommends USDA consider how its own labeling requirements, including organic, should apply to digital platforms, but references the broad public comment received that urges the NOP to wait for or align with FDA to finalize any action to avoid conflicting regulations.

The Subcommittee recommends that instead of implementing any regulatory change at this time, NOP should issue guidance on e-commerce labeling practices to provide clear and consistent expectations for how organic claims are made on digital platforms. Any guidance should:

- Outline recommended best practices for displaying the USDA Organic seal and core labeling elements on product listings, including displaying images of full product labels with the "Certified organic by * * *" statement where possible
- Encourage accurate and timely updates by retailers and platforms
- Reinforce expectations for truthful organic claims across digital channels

Find the full proposal here.

**Subcommittee vote to accept proposal:**

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

- **NOSB Policy & Procedures Manual (PPM) Updates** – proposal recommends updates to the PPM to address actions the Board can take when Board members do not participate in Board activities. Also included are three updates to improve trust and transparency when evaluating substances for inclusion on the National List. Find the full proposal here.

  **Subcommittee vote to accept proposal:**

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

- **Research Priorities 2026** – proposal details the Board's annual list of research priorities, which includes an effort to categorize and differentiate highest priority topics from the ongoing list. In response to stakeholder comments received at the Fall 2026 meeting emphasizing the need for research across multiple topics, the Subcommittee is introducing a new category, "interdisciplinary," which incorporates topics previously grouped under "other." Find the full discussion here.

  **Subcommittee vote to accept proposal:**

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

## FOR INFORMATION GATHERING

### Discussion Documents

- **Sunset Review Efficiency** – discussion document addresses a concept introduced at the Spring 2024 meeting which sought to group substances up for Sunset Review and vote for their relisting to reduce the

review and discussion time at in-person meetings. The Board trialed grouping substances for which there is widespread support and no new information to consider into a single vote. After mixed reviews from stakeholders, the Subcommittee determined that the potential time savings is not worth potential confusion by the Board nor potential for reduced transparency for stakeholders. The Board will continue to review and vote for each substance individually and with an interest in efficiency, encourages Board members to focus particularly on new information in their review. Find the full discussion here.

**Subcommittee vote to accept proposal:**

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

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## 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.