



## Organic Trade Association's Rescheduled Virtual Fall 2025 National Organic Standards Board Meeting Report HIGHLIGHTS, OUTCOMES, AND NEXT STEPS

On January 13 and 14, 2026 the National Organic Standards Board (NOSB) held an abbreviated virtual public meeting in place of its Fall 2025 meeting, which was canceled last fall as a result of the federal government shutdown. The primary purpose of NOSB meetings is to provide an opportunity for organic stakeholders to give input on proposed NOSB recommendations and discussion items. While oral public comment was not included as part of this abbreviated session, written comments were accepted in the fall and in advance of the January meeting. The meetings also allow NOSB to receive updates from USDA's National Organic Program (NOP) on issues pertaining to organic agriculture. The full agenda for the meeting, all proposals and discussion documents presented at the meeting, as well as full text of OTA's submitted written comments are available on the [OTA's NOSB Meeting Webpage](#).

### INTRODUCTIONS, UPDATES, AND PRESENTATIONS

**Welcoming remarks, NOSB Chair Report:** After introducing NOSB members and taking a moment of appreciation for the five members concluding their terms at this meeting, NOSB Chair Amy Bruch, whose own term comes to an end this month, shared her personal journey to finding a home in the organic community and a successful business opportunity for her family farm. After some further reflections on the Board's work from Vice Chair Allison Johnson, the meeting got underway.

**USDA/AMS/NOP Update:** Deputy Administrator Dr. Jennifer Tucker provided updates on the program's key priorities and then opened the floor for questions from NOSB members. Some highlights of the presentation are included below and largely focused on oversight of organic imports, certifier oversight and collaboration, and thoughts on streamlining the organic certification process. OTA is tracking closely the following topics and will continue to provide updates to OTA members.

- **Import Oversight**
  - The Program is realizing the benefits of the Strengthening Organic Enforcement (SOE) Rule as we enter the second year since it became effective.
  - By leaning into the oversight provided by brokers and a strong partnership with U.S. Customs and Border Protection, organic goods arriving without required import certificates or bearing noncompliant organic claims are not entering the U.S. market.
  - Because of investments in technology that requires an electronic "handshake" between importers and exporters, this enhanced communication is expediting NOP's ability to investigate noncompliant activities.
  - Enhanced access to and generation of trade data, along with certifiers' strengthened controls systems, is also aiding in risk-based oversight in countries where the greatest risk to organic integrity has been identified.
  - While positive strides have been made overall, challenges remain in further developing certifier oversight capabilities, as well as with the limitations of international equivalence arrangements and enforcement against international operations.
- **Enforcement Successes**
  - Of the 755 complaint cases received in 2025, NOP resolved 700.



# ORGANIC TRADE ASSOCIATION

- Over \$845K in civil penalties were levied, focusing on repeat violators and high value/high volume complaints.
- While enforcement and oversight successes are significant, domestic handlers have a responsibility to verify purchases and implement oversight and detection of fraud. NOP has assisted in these efforts by issuing “Notices of Inorganic Purchases” to handlers when an investigation reveals noncompliant organic product has entered the market.

- **Streamlining Certification**
  - Dr. Tucker addressed the ongoing conversation in the industry about how the program can apply a sound and sensible, risk-based approach to certification that that streamlines processes, reduces paperwork, but can catch bad actors, deter fraud, and uphold organic integrity.
  - SOE drove additional requirements and information requests unilaterally, which resulted in ballooning organic system plans (OSPs). There is an opportunity to step back and look at what the regulations actually require and what *must* be in the OSP.
  - A common OSP is one ongoing effort aimed at helping streamline certification. A draft common OSP is in the process of being finalized and will be posted to the NOP website as an optional template to be adopted by certifiers.

## NOSB MEMBERS

This [15-person citizen advisory board](#) brings together volunteers from around the United States. It is made up of 4 farmers/growers, 2 handlers/processors, 1 retailer, 1 scientist, 3 consumer/public interest advocates, 3 environmentalists, and 1 USDA accredited certifying agent. At this meeting, 13 members were in attendance.

### National Organic Standards Board (NOSB)



 Amy Bruch	 Brian Caldwell	 Carolyn Dimitri	 Logan Petrey Linkenhoger	 Kyla Smith
 Allison Johnson	 Dilip Nandwani	 Javier Zamora	 Nate Lewis	 Franklin Quarcoo
 Kathryn Deschenes	 Amanda Felder	 Andrea Hatziyannis	 Cat McCluskey	 Corie Pierce

## MEETING OUTCOMES

**PROPOSALS:** 5 proposals were considered and passed by NOSB. Successful NOSB proposals are referred to



USDA for approval and implementation and do not become effective until accepted by the USDA and implemented through rulemaking.

- **Synthetic Compostable Polymers (CROPS)** – proposal wrapped up over two years of work on this topic, which was referred to the Board when a petition was filed with NOP to amend the definition of compost. In previous meetings, the Board recommended a compost definition and update to the compost practice standard and affirmed that all synthetic compost feedstocks must be added to the National List by NOSB recommendation and USDA rulemaking. The Board concluded its work on the topic at this meeting, passing three related recommendations that:
  - Set a definition of compostable materials as those meeting several ASTM compostability specifications **Passed (13 yes, 0 no, 2 absent)**;
  - classified as synthetic compostable materials meeting these specifications **Passed (13 yes, 0 no, 2 absent)**; and
  - proposed adding compostable materials to the National List at 7 CFR § 205.601(c) – as compostable feedstocks **Failed (0 yes, 13 no, 2 absent)**.

The NOP must now consider the petition in light of the NOSB recommendations and enter into a deliberative process with USDA. Nothing changes from a policy perspective, and the regulation remains unchanged at this time.

- **L-Malic Acid Reclassification (HANDLING) Passed (12 yes, 0 no, 3 absent)** – proposal resolves confusion and ensures consistency in use of L-malic acid by amending the nonsynthetic listing at 7 CFR § 205.605(a) to specify production by fermentation and/or enzymatic conversion of carbohydrates, and recommends the addition of synthetic L-malic acid to 7 CFR § 205.605(b). This change would align the regulations with current use practices.
- **Oxytocin Annotation Change (LIVESTOCK) Passed (12 yes, 0 no, 3 absent)** – proposal amends the annotation for oxytocin to “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.” In the absence of this amendment, some instances were found of use of oxytocin beyond the original post-parturition intent of its listing.
- **Risk-Based Certification (COMPLIANCE, ACCREDITATION, AND CERTIFICATION) Passed (12 yes, 0 no, 3 absent)** – proposal addresses the concept of risk-based certification, part of a broader effort the Board has been working on across several recommendations, through this four-part recommendation, which:
  - Establishes a common set of definitions to identify risk.
  - Proposes the NOP publish guidance or instruction to certifiers to establish a baseline of common risk criteria, identify a common objective for conducting risk assessments, and proposes NOP communicate acute risks to certifiers at its annual certifier training.
  - Proposes NOP, in collaboration with stakeholders, establish a framework by which certifiers can use critical thinking and use a flexible approach to administer the organic regulations to operations with varying risk levels.
  - Proposes NOP and the Accredited Certifiers Association develop and revise training materials to support certifiers in conducting risk-based certification.
- **Residue Testing for a Global Supply Chain: Regulation Review § 205.671 (COMPLIANCE, ACCREDITATION, AND CERTIFICATION) Passed (12 yes, 0 no, 3 absent)** – proposes a revision to §



205.671, which currently prevents the sale of agricultural products as organic when a prohibited substance is found to exceed 5% of the EPA's tolerance for that substance on conventional food. The revision would also require exclusion of sale when an intentional application of a prohibited substance is found.

**DISCUSSION DOCUMENTS:** NOSB considered **2** discussion documents at this meeting. Once considered by the full Board, the usual process is to bring the discussion documents back to the respective subcommittee, incorporate public comments and board discussion, and bring them to a subsequent meeting as a proposal for a full board vote.

- **Residue Testing for a Global Supply Chain: Regulation Review (§ 205.670 and UREC definition) (COMPLIANCE, ACCREDITATION, AND CERTIFICATION)** – discussion addresses the residue testing framework in the organic regulations and the need to update several areas for consistency and clarity.
  - Updating testing requirements: considers a recommendation to move from quantity-based testing—currently certifiers are required to test 5% of their certified operations—to risk-targeted testing.
  - Cost of testing: the regulations currently require certifiers to absorb all residue testing costs. Targeted cost recovery could enable more effective, risk-based testing without overburdening low-risk operations.
  - Data: considers updating the regulations to clarify access to residue testing results and value of a centralized, accessible database of residue testing results.
  - Downstream communication: current regulations do not require notification of downstream buyers when a noncompliant product is found to have entered the market. Such notification could bolster organic integrity in the market but considerations must be made to ensure fair and consistent application.
  - Detection of Unavoidable Residual Contamination (UREC): with detection technology now able to identify trace residues, guidance updates are needed to ensure consistency in response to low levels of residue.
- **Induced Mutagenesis (MATERIALS)** – addresses the use of induced mutagenesis in the production of seed for use in organic production and seeks to determine whether this technology is considered an excluded method as defined in past NOSB recommendations. Discussion pointed to the challenge of meeting consumer demand and expectation of certain crops in organic form while also safeguarding against use of technology that does not align with organic regulations.

**SUNSET REVIEWS:** NOSB voted to **renew all but one National List material** under sunset review at the meeting. **Cornstarch (native)**, which appears on the list of nonorganically produced agricultural products allowed as ingredients in products labeled as “organic” (§ 205.606), was voted to be removed. The Board considered public comments that pointed to adequate supply of organic cornstarch in all the forms currently in use in organic production.

The use of cornstarch as a component of baking soda, a common ingredient in organic baked goods, drew considerable discussion. When baking soda is used as an ingredient in an organic product, this vote would require the cornstarch used in the baking soda to be organic. For the cornstarch in the baking soda to contribute to the percentage of organic ingredients in the product and thus contribute to an “organic” claim, the handler of the baking soda would require certification. Because of the allowance for non-organic cornstarch at this time, it is not currently a common practice for handlers of baking soda to be certified. The Board recognized the initial logistical challenges this change may present, but noted these challenges are not insurmountable.

As with any proposal passed by the Board, the NOP must first complete rulemaking which includes publishing a proposed rule with additional opportunity for public comment period. It is important to remain engaged in the



regulatory process through these steps and to continue to provide public comment until a final rule is published and effective. OTA will provide updates as NOP engages in rulemaking.

## **OFFICER ELECTIONS, MEMBER FAREWELLS, AND BOARD WORK AGENDA**

The Board elected the following slate of officers to the executive committee. OTA congratulates the incoming officers and looks forward to their leadership!

**Chair:** Allison Johnson

**Vice Chair:** Amanda Felder

**Secretary:** Andrea Hatziyannis

The Board bid farewell to five members who complete their 5-year terms this month. OTA extends its gratitude to the members for their hard work and service to the organic community. Five new members are expected to be appointed and announced in the coming weeks.

**Amy Bruch (outgoing Chair)**

**Logan Petrey Linkenhoger**

**Brian Caldwell**

**Kyla Smith**

**Carolyn Dimitri**

The Board closed the meeting with a review of its current work agenda, below, and what to expect for the Spring 2026 meeting. The full NOSB Work Agenda can be found on the [NOSB's website](#).

Current NOSB Work Agenda			
Subcommittee	Item	NL Section	Doc Type
Crops	<b>Petition:</b> Pear Ester	\$205.601	<b>Proposal</b>
	<b>Petitions:</b> Chitosan (classify as natural). Chitosan (classify as synthetic & add to NL). 2028 Crops Sunset Substances* <a href="#">next slide</a>	\$205.601 \$205.601-602	Discussion Discussion
	<b>Petition:</b> Chlorine Materials	\$205.603	Discussion
Livestock	Integrating livestock and agroforestry crops	n/a	Discussion
	2028 Livestock Sunset Substances* <a href="#">next slide</a>	\$205.603-604	Discussion
Handling	<b>Petition:</b> Chitosan	\$205.605(b)	<b>Proposal</b>
	<b>Petitions:</b> Sea Silt (cosmetics). Potassium Polyaspartate (wine)	\$205.605	Discussion
	Sodium Bicarbonate classification	\$205.605	<b>Proposal</b>
	2028 Handling Sunset Substances* <a href="#">next slide</a>	\$205.605-606	Discussion
Materials	Excluded Methods (Induced Mutagenesis)	n/a	<b>Proposal</b>
	Research Priorities	n/a	<b>Proposal</b>
Certification, Accreditation, and Compliance	<b>Petition:</b> eCommerce Organic Labeling Requirements	n/a	<b>Proposal</b>
	Residue Testing for a Global Supply Chain: Regulation Review (\$205.670 and UREC)	n/a	<b>Proposal</b>
	Consistency in organic seed use	n/a	Discussion
Policy Development	NOSB Policy & Procedures Manual (PPM) Updates	n/a	<b>Proposal</b>
	Sunset Review Efficiency Update	n/a	Discussion



## Current NOSB Work Agenda - Sunset Substances

Subcommittee	Sunset Substances	NL Section
Crops	Chlorine materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid, & Sodium hypochlorite). Ozone gas.	§205.601(a)
	Copper sulfate	§205.601(a) & (e)
	Peracetic acid	§205.601(a) & (i)
	Magnesium oxide	§205.601(j)
	EPA List 3 Inerts	§205.601(m)
Livestock	Calcium chloride. Rotenone.	§205.602
	Activated charcoal. Calcium borogluconate. Calcium propionate. Chlorine materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid, & Sodium hypochlorite). Kaolin pectin. Mineral oil. Nutritive supplements. Propylene glycol.	§205.603(a)
	Sodium chlorite	§205.603(a) & (b)
	Zinc sulfate	§205.603(b)
Handling	Agar-agar. Animal enzymes. Calcium sulfate. Carrageenan. Glucono delta-lactone. Tartaric acid.	§205.605(a)
	Cellulose. Chlorine materials (Calcium hypochlorite, Chlorine dioxide, Hypochlorous acid, & Sodium hypochlorite). Potassium hydroxide. Potassium lactate. Silicon dioxide. Sodium lactate.	§205.605(b)

### SPRING 2026 MEETING

Spring 2026 meeting dates and location have yet to be announced, however the NOP noted it will take place in May. OTA will share meeting details as soon as they are available.

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**About the Organic Trade Association's NOSB Report:** As a service to its members, the Organic Trade Association attends NOSB meetings. The NOSB Report, a member publication, summarizes the meeting and provides an overview of the agenda topics, public commentary, and key decisions made by NOSB. The items included in this report represent recommendations that NOSB developed and reviewed at its meetings. If accepted by the Board, recommendations pass to the National Organic Program, which determines the final form of the NOSB recommendations. Our members are alerted to steps in rulemaking through our News Flash or other member communications. Archives of our NOSB Report are available on our website. Please contact [Scott Rice](#), OTA's Senior Director, Regulatory Affairs, for more information.