



## Organic Trade Association's Spring 2025 National Organic Standards Board Meeting Report

### HIGHLIGHTS, OUTCOMES, AND NEXT STEPS

On April 29-May 1, the National Organic Standards Board (NOSB) held its biannual public meeting online via Zoom. The primary purpose of NOSB meetings is to provide an opportunity for organic stakeholders to give input on proposed NOSB recommendations and discussion items. 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:** National Organic Program (NOP) Deputy Administrator Christopher Purdy, marking his first meeting in his role, kicked things off noting this was the 72<sup>nd</sup> NOSB meeting, a remarkable milestone of this public-private partnership. After introducing NOSB members, including the five newly appointed members for whom this was also their first meeting, NOSB Chair Amy Bruch expressed appreciation for the farmers who took the time the previous week during public comment webinars to participate, and noted the importance of organic agriculture's ability to bring prosperity and opportunity to rural America. Bruch indicated nominations for 5 upcoming seats on the Board will open sometime this summer. Opening seats include two Organic Producers, two Public Interest/Consumer Interest Representatives, and one USDA Accredited Certifying Agent, all with a 5-year term that begins January 2026. OTA encourages all to think about interested, qualified nominees and will alert the community when nominations open.
- **USDA/AMS/NOP Update:** Deputy Administrator Purdy and NOP Division Directors provided program updates and then opened the floor for questions from NOSB members. Some highlights of the presentation are included below and largely focused on the status of implementation of the Strengthening Organic Enforcement rule, which marked one year of implementation on March 19. OTA is tracking closely the following topics and will continue to provide updates to OTA members.
  - **Strengthening Organic Enforcement (SOE)**
    - With SOE now requiring certification of all but a few exempt operations in the organic supply chain, NOP is seeing this increased certification coverage facilitate greater oversight. Between January 2024 and March 31, 2025, over 7,000 new handlers attained certification.
    - Certifiers are strengthening their control systems, NOP has completed desk audits of certifier improvements, and additional controls are stopping products at the border without import certificates.
    - Over 177,000 import certificates have been issued since SOE implementation, which has allowed NOP to watch and learn from data patterns and flows.



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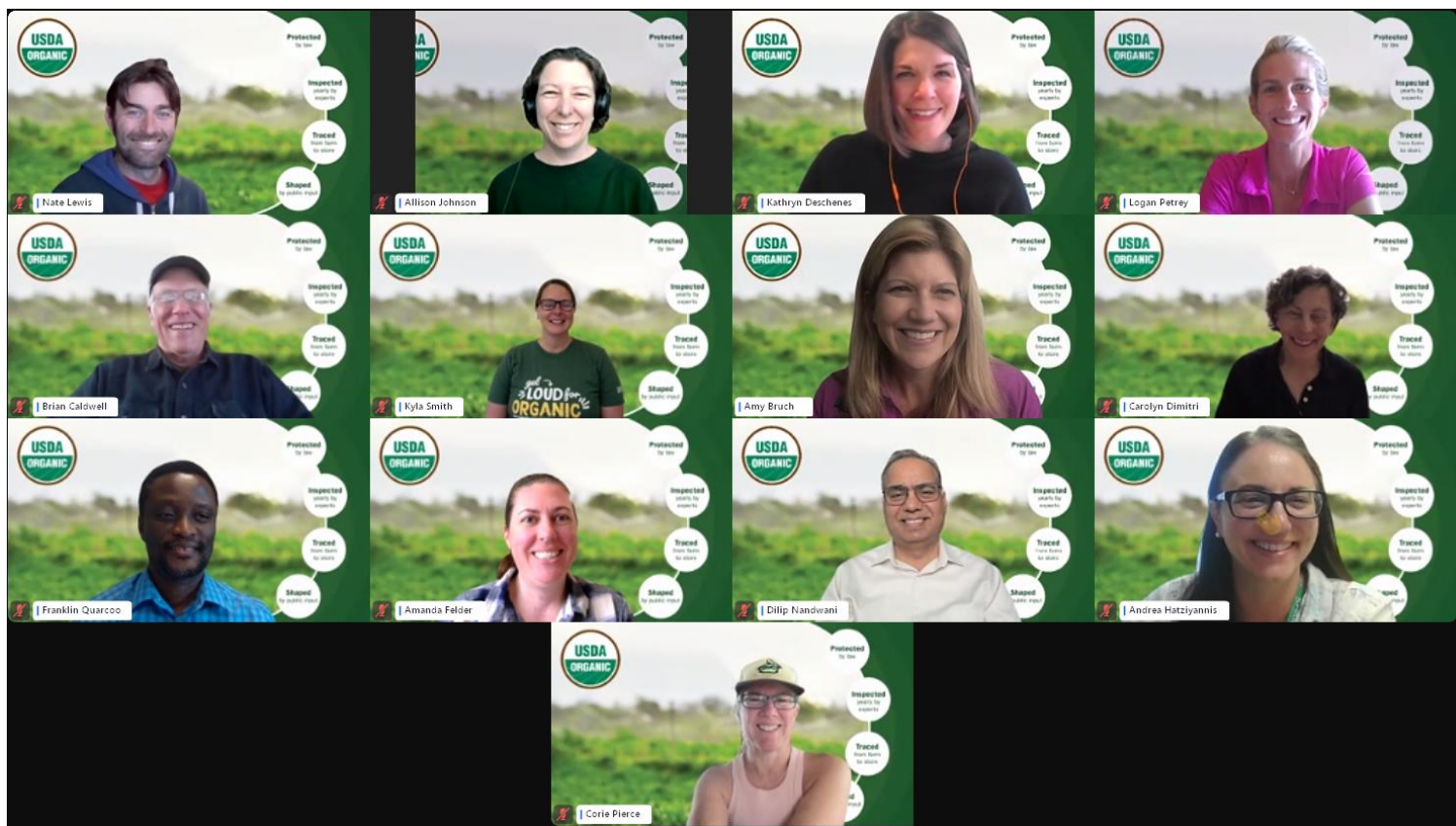
- In collaboration and partnership with U.S. Customs and Border Protection, NOP is using enhanced access to trade and shipment data to increase import oversight. Proactive targeting helps determine volumes of incoming goods, location of entry, and arrival details.
- NOP is focusing residue testing on high-risk feed commodities such as soybeans, soybean meal, and corn from the Black Sea, India, and Africa, testing for pesticides, herbicides, solvents, and GMOs.
- **Risk-Based Oversight**
  - SOE has introduced the concept of risk-based oversight, which seeks to avoid applying a one-size-fits-all approach to certification.
  - A risk-based approach, which aims to reduce unnecessary burdens of certification while holding an operation accountable for compliance, is essential to certifiers focusing on operations with the highest risk and greatest threat to organic integrity.
  - NOP is working closely with certifiers to explore risk-based models, and OTA is actively engaged in this topic to explore how best to make certification continue to be sound, sensible, and attainable to all.
- **Transition to Organic Partnership Program (TOPP) Presentations:** Jessy Beckett Parr, Chief Program Officer at Southwest TOPP region lead CCOF, shared updates and successes from the SW Region and across the nation. Nationwide, TOPP continues to see impact with 237 mentors matched with 327 mentees, 1,466 in-person and virtual events, and 2,225 technical assistance engagements. The national [TOPP website](#) has further details on the programs across the nation.

## 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, 14 members were in attendance.



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[Current NOSB members](#) First row (L to R): Nate Lewis (Secretary), Allison Johnson (Vice Chair), Kathryn Deschenes, Logan Petrey; Second row (L-R): Brian Caldwell, Kyla Smith, Amy Bruch (Chair), Carolyn Dimitri; Third row (L-R): Franklin Quarcoo, Amanda Felder, Dilip Nandwani, Andrea Hatzilyannis; Bottom row: Cori Pierce; Not pictured are Cat McCluskey who stepped out early, and Javier Zamora, who was absent for this meeting.



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## MEETING OUTCOMES

**PROPOSALS:** 7 proposals were considered by NOSB, of which 5 passed and two were referred back to subcommittee for further consideration. 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.

- **Ethylene – Annotation Change (HANDLING) Passed (14 yes, 0 no, 1 absent)** – proposal recommends expansion of annotation to allow use for sprout inhibition in potatoes and onions.
- **Fish Oil CAS number – Technical Correction (HANDLING) Passed (14 yes, 0 no, 1 absent)** – during sunset review in 2024, a public commenter identified an error in the listing in which CAS numbers included identify components of the fish oil but not the fish oil itself. Proposal recommends eliminating the CAS numbers included in the fish oil listing at § 205.606.
- **Pear Ester – Petitioned (CROPS) Motion to return to Subcommittee (14 yes, 0 no, 1 absent)** – petitioned in 2023 for use as an insect management substance. 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, a substance with similar function. The Board appears in favor of adding to the National List, however expressed concern regarding microencapsulation formulations, which disperse the substance broadly in tiny plastic capsules. The Board returned the proposal to subcommittee to add an annotation restricting the use of microencapsulation formulas, a restriction that will not affect predominant formulations and applications in organic production, and is expected to vote again at the Fall meeting.
- **Compost, Feedstocks, and the National List (CROPS) Passed (14 yes, 0 no, 1 absent)** – proposal responds to a request from NOP to the NOSB to address a petition from the Biodegradable Products Institute to allow certain materials in organic compliant compost. The proposal reiterates the NOSB's role in the review of synthetic substances and states synthetic substances intentionally included as compost feedstocks in organic compliant compost must be evaluated by the NOSB and recommended for addition to the National List through the Federal Register process of notice and comment rulemaking by the NOP.
- **Iodine – Annotation Change (LIVESTOCK) Passed (13 yes, 0 no, 2 absent)** – proposal to restrict iodine to formulations that do not contain nonylphenol ethoxylates (NPEs) as these are known endocrine disruptors.
- **Risk-Based Certification (CERTIFICATION, ACCREDITATION, AND COMPLIANCE) Motion to return to Subcommittee (13 yes, 0 no, 2 absent)** – proposal explores how to best focus risk-based oversight considering the unintended regulatory burdens placed on low-risk operations as a result of the Strengthening Organic Enforcement rule. The subcommittee asks where and how the community can focus on high-risk operations and reevaluate the



certification process for low-risk operations, and answers this question through four points: Definitions, Risk Criteria, Oversight Activities Process and Matrix, and Training and Resources. The Board expressed strong support for the document, however discussion pointed to the need for several improvements before moving forward and thus sent the proposal back to subcommittee. The Board is expected to vote again at the Fall meeting.

- **Residue Testing for a Global Supply Chain (CERTIFICATION, ACCREDITATION, AND COMPLIANCE)** **Passed (13 yes, 0 no, 2 absent)** – continuing the Board’s ongoing work around residues and testing as means of upholding organic integrity and deterring fraud, proposal recommends updates to Guidance Documents in the NOP Handbook pertaining to sample collection, lab selection criteria, the list of prohibited pesticides sampled, and responding to lab test results.

**DISCUSSION DOCUMENTS:** NOSB considered **5** 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.

- **Sunset Review Efficiency (POLICY DEVELOPMENT)** – considers options to increase the efficiency of the NOSB’s statutory requirement to review National List substances scheduled to sunset, a process that occupies significant time at each Fall meeting. The Board discussed how it might use a consent agenda for each subcommittee and group substances which has received unanimous votes to relist and for which there is no new information available regarding the required review criteria. The board discussed how this might work in practice, and identified and responded to concerns raised in public comments, which primarily focused on ensuring the review process remains transparent to the public and provides opportunity for the full Board to discuss at the public meetings. In its initial review of the substances up for review this cycle, the Board identified 8 Crops substances, 4 Livestock substances, and 2 Handling substances that would qualify for an expedited review. Subcommittees will further explore the potential, and the Policy Development subcommittee will make a decision on whether to bring forward a proposal in the Fall that would implement the consent agenda process.
- **L-Malic Acid Reclassification (HANDLING)** – discussion document looks to resolve confusion and ensure consistency in use of L-malic acid by recommending the addition of synthetic L-malic acid to 7 CFR § 205.605(b) with a commercial availability limitation, in addition to retaining the nonsynthetic listing currently included at 7 CFR § 205.605(a). This change would align the regulations with current use practices, as well as codify a preference for the nonsynthetic version. The Board considered public comment, which pointed to certifier difficulty in determining synthetic from nonsynthetic forms, as well as concern that adding an additional listing may set a precedent of the Board adding substances at will, to which the Board responded this was a unique situation and would not set a precedent.
- **Compostable Synthetic Food Packaging Plastics and Cellulosic Fiber-Based Materials (CROPS)** – the Board discussed the goal of considering synthetic compostable substances that meet three ASTM standards cited in a petition from the Biodegradable Products Institute to the NOP to include such substances on the National List. Board comments noted the opportunity to comprehensively review the use of paper while looking at other substances. The Board also noted concerns regarding the impacts on soil microbiota when compost containing these synthetic materials are applied to organic land



and whether compost is the place to take care of “cleaning up” these substances. The Board has received a Technical Review which will help inform its discussion and potential for a proposal moving forward.

- **Research Priorities 2025 (MATERIALS)** – discussion details the Board’s annual list of research priorities, which includes an effort to categorize and differentiate highest priority topics from the ongoing list. The Board noted interest in comments suggesting adding whole farm ecosystem service assessments as a topic, as well as looking at areas of trade, imports, and agronomics. The Board reiterated its interest in inviting someone from the USDA’s National Institute of Food and Agriculture to understand how the Board’s research priorities have impacted research in the field.
- **Residue Testing for a Global Supply Chain Regulation Review (CERTIFICATION, ACCREDITATION, AND COMPLIANCE)** – continuing the Board’s ongoing work around residues and testing, explores areas of the regulation that may benefit from revision. The discussion addresses updating the regulation to clarify that an intentional application of a prohibited substance or excluded method should exclude the crop from organic sale, regardless of whether a tolerance level is established. The discussion also addresses a revised response to Unavoidable Residual Environmental Contamination (UREC), seeking to clarify that such presence is not cause for requiring an investigation by certifiers and response by certified operations, which expends limited time and resources of both parties. Also addressed is the need to review who must cover the cost of residue testing depending on whether the testing is part of the required 5% of certified operations, or is a result of a compliance investigation. The Subcommittee will continue to explore these topics and questions.

**SUNSET REVIEWS:** NOSB discussed the following 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](#), [Crop](#), and [Livestock](#) 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 last sunset review and any updates to these from the Spring meeting
- NOSB vote at last sunset review (unanimous vote to renew, majority vote to renew, or significant vote to remove/vote to remove)
- Subcommittee questions to the community

Please consider these summaries, the OTA position, the importance of the substance to your business, and complete OTA’s sunset [Handling](#), [Crop](#), and [Livestock](#) surveys if you feel the position does not reflect your own.

The following substances received particular attention from the Board and appear to be under consideration for removal.





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MATERIAL (SUBCOMMITTEE)	QUESTIONS	DISCUSSION/REQUESTS
<b>Beet juice extract color</b> <b>Beta-carotene extract color</b> <b>Black/purple carrot juice color</b> <b>Chokeberry, aronia juice color</b> <b>Elderberry juice color</b> <b>Grape skin extract color</b> <b>Purple sweet potato juice color</b> <b>Red cabbage extract color</b> <b>Red radish extract color</b> <b>Saffron extract color</b>	<ol style="list-style-type: none"> <li>Which of these colors are now commercially available in organic form?</li> <li>Where information about commercial availability is mixed (i.e. where some, but not all, commenters note that the organic color is available), should those colors be removed from the National List to ensure adequate market pressure to complete the transition to organic?</li> <li>How essential are the colors that remain on the list? For example, could a different anthocyanin be substituted for red radish?</li> <li>Are there any other specific barriers to organic transition for individual colors (e.g., grape skin extract supply is limited by constraints on organic winemaking)?</li> </ol>	<p>The Board acknowledged public comments noting the ability to remove several colors and the commercial availability limitations for others that may make removal challenging at this time. Discussion noted the complexity of sourcing and that minimum volumes required for purchase may also make a color commercially unavailable when production demand does not meet the minimum.</p> <p><b>For all colors, the Board explicitly requested specific detailed information regarding where supply is sufficient and where it is not.</b></p>
<b>Cornstarch (native) (HANDLING)</b>	<ol style="list-style-type: none"> <li>In the past 5 years, the number of suppliers of organic cornstarch has nearly tripled. Does this mean that there is a sufficient supply of organic cornstarch?</li> <li>Are there <i>any</i> barriers to using organic cornstarch instead of the non-GMO based conventional cornstarch? We are especially interested in understanding why organic and conventionally produced cornstarch would not be completely interchangeable.</li> <li>Is there sufficient supply of non-GMO based conventional cornstarch?</li> </ol>	<p>Discussion noted public comments largely in support of removal.</p> <p><b>The Board is particularly interested in receiving information on performance of the various organically available forms, particularly molding starch.</b></p>
<b>Glycerin (HANDLING)</b>	None	<p>The Board noted comments suggesting a robust supply of organic glycerin exists. However, the Board noted difficulties for purchasers in determining whether sources meet the annotation. Another concern noted most sources originate in India, where there has been a history of fraud and questioned whether removal would narrow supply to a fraud-prone region.</p> <p><b>The Board would like to receive more detail on organic supply and sourcing information.</b></p>
<b>Inulin-oligofructose enriched (HANDLING)</b>	<ol style="list-style-type: none"> <li>Is there adequate supply of inulin derived from organic sources?</li> <li>Are there technical or other barriers to using inulin derived from organic sources in place of inulin derived from conventional sources?</li> </ol>	<p>While the Board appears supportive of renewing, it acknowledged a previous Board's unanimous vote to remove in 2015, followed by a 2020 unanimous vote to renew and retain on the list.</p> <p><b>The Board requested detail on the availability of organic forms, as well as a better understanding of the previous votes.</b></p>



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MATERIAL (SUBCOMMITTEE)	QUESTIONS	DISCUSSION/REQUESTS
<b>Aquatic plant extracts (other than hydrolyzed) (CROPS)</b>	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.	<p>The Board appears supportive of renewing, however it recognized the wording of the existing annotation limiting use of potassium hydroxide or sodium hydroxide to “that amount necessary for extraction” is problematic. Since the listing covers a broad range of species and nutrients, it is difficult to determine if an extractant has been added to boost the potassium content. One option considered may be amending the annotation to limit extraction to sodium hydroxide, for which the addition of excessive amounts would no have benefit.</p> <p>Also noted was the problematic language “other than hydrolyzed”, which the Board noted may have been included in error as a result of a transcription error.</p> <p><b>The Board may consider a parallel motion to amend the annotation to address one or both problematic pieces of language.</b></p>
<b>Fatty alcohols (CROPS)</b>	Are approved organic herbicides, such as those made with organic acids, effective to de-sucker tobacco?	<p>This is the first sunset review of this substance. The Board referenced a certifier comment that 50% of the tobacco growers they certify use it, with one member wondering why the other 50% do not.</p> <p><b>The Board seeks additional farmer input on the necessity of this substance.</b></p>
<b>Butorphanol (LIVESTOCK)</b>	<ol style="list-style-type: none"> <li>1. In what circumstances is Butorphanol commonly used on organic livestock operations?</li> <li>2. Is the pain relief material toolbox for managing pain in surgical applications sufficient?</li> </ol>	<p>With the review of this substance, the Board opened a broader discussion regarding inconsistent withdrawal times included in the annotations of several pain relief substances. Some listings reference a number of days while others reference a doubling of stated FDA times.</p> <p><b>The Board may consider parallel motions to amend annotations for clarity and consistency.</b></p>
<b>Oxytocin (LIVESTOCK)</b>	<ol style="list-style-type: none"> <li>1. Is oxytocin an essential material for safe and humane treatment of animals in organic production and why?</li> <li>2. Are there nonsynthetic alternatives, or other methods that can be used to accomplish the same results as oxytocin?</li> </ol>	<p>The Board appears supportive of renewing for its intended use for medical purposes, but noted the annotation lacks specificity to prevent the substance’s use to boost milk production.</p> <p><b>The Board may consider an annotation to address potential overuse of the substance for milk production vs. a medical response in postpartum situations, the use for which the listing is intended.</b></p>
<b>Formic acid (LIVESTOCK)</b>	<ol style="list-style-type: none"> <li>1. Are the options for controlling Varroa mites in beehives sufficient or redundant?</li> </ol>	<p>The Board noted public comments in opposition of listing apiary substances in the absence of specific apiary standards in the</p>





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MATERIAL (SUBCOMMITTEE)	QUESTIONS	DISCUSSION/REQUESTS
	2. Are there natural ways to combat mites that could reduce the dependency on parasiticides?	regulations. While comments are generally few on these substances, the Board acknowledged this is likely due to most organic apiary production occurring outside the U.S. and these stakeholders not aware and/or engaged in the regulatory process. <b>While it may be challenging to obtain, the Board may benefit from additional detail on use of apiary substances.</b>
<b>Sucrose octanoate esters (LIVESTOCK)</b>	1. Is there current information on the use of SOE formulations by farmers? 2. Is there a large demand for SOE formulations by livestock producers?	See above comments for formic acid. An updated Technical Review is anticipated for this substance.
<b>Excipients (LIVESTOCK)</b>	1. Is the current annotation sufficient for effective use by certifiers? 2. Is the current review process sufficient to ensure that excipients meet OFPA criteria? If not, are there alternative methods, lists, or classifications that could comply?	The Board discussed the challenge that two parts of the annotation present: (3) Included in the FDA review and approval of a New Animal Drug Application or New Drug Application; or (4) Approved by APHIS for use in veterinary biologics. The Board noted the difficulty certifiers and Material Review Organizations have when trying to verify this portion of the annotation and as such, may allow some excipients that do not meet National List criteria. One member urged caution when considering any limitation on excipients or additional review requirements as these substances are often an ingredient in emergency use medications and any delay in administering them risks animal health and welfare. <b>The Board seeks more information on the use, annotation, and verification of these substances.</b>

## OTHER TOPICS AND CLOSING REMARKS

The Board closed the meeting with a review of the tentative agenda for the Fall, below, with the caveat there may be the addition of proposed annotation changes for substances discussed at this Spring meeting. The full NOSB Work Agenda can be found on the [NOSB's website](#).



# ORGANIC TRADE ASSOCIATION

## National Organic Standards Board Meeting



TENTATIVE Fall 2025 NOSB Meeting Agenda | November 4 - 6, 2025 | Omaha, NE

Subcommittee	Item	NL Section	Document Type
Certification, Accreditation and Compliance	Consistency in organic seed use	n/a	Proposal
	Risk-based Certification		
	Residue Testing for a Global Supply Chain: Regulation Review		
Materials	Excluded Methods (Induced Mutagenesis)		
	2025 Research Priorities		
	Synthetic Compost Feedstocks		
Crops	Pear Ester - petitioned	\$205.601	
	2027 Crop Sunset Substances	\$205.601-602	
Livestock	Chlorine Materials – petitioned	\$205.603	
	Integrating livestock and agroforestry crops	n/a	
	2027 Livestock Sunset Substances	\$205.603-604	
Handling	Chitosan – petitioned	\$205.605(b)	
	L-Malic Acid Reclassification	\$205.605	
	2027 Handling Sunset Substances	\$205.605-606	
Policy Development	PPM Updates	n/a	
USDA Agricultural Marketing Service   National Organic Program			

USDA Agricultural Marketing Service | National Organic Program

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### FALL 2025 MEETING

The [Fall 2025 NOSB Meeting](#) is scheduled for November 4-6 to be held in person in Omaha, NE. The public comment webinars are scheduled for October 28 and October 30 from Noon – 5:00 pm Eastern.

**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.