



FALL 2024 NOSB MEETING

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

The [fall 2024 National Organic Standards Board \(NOSB\) Meeting](#) will be held on October 22-24 in Portland, OR. 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 15 & 17 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 **September 30, 2024**. Visit OTA's webpage [for more information](#).

QUICK REFERENCE

[Presentations and Panels](#)

[Handling](#)

[Livestock](#)

[Crops](#)

[Other Topics including Materials, Compliance, Accreditation, and Certification](#)

[Definitions](#)

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.
- **Northwest Transition to Organic Partnership Program (TOPP) Presentations** – Members of the Northwest TOPP program, led by Oregon Tilth, will present on their activities.

HANDLING

TO BE VOTED ON

Proposals

- **[Potassium Phosphate](#)** – petition requests to remove the restriction of potassium phosphate for use only in products labeled 'made with organic ingredients', as well as to change the listing to "potassium phosphates" (plural), to allow for additional types of potassium phosphate in organic products. The Subcommittee expressed concern regarding negative health impacts of dietary exposure to phosphates and did not see reason to expand its use. This material is undergoing sunset review separately.
Motion to remove the annotation restricting the use of potassium phosphate to 'made with organic ingredients' and to add an "s" to phosphate at § 205.605(b):
0 Yes, **7 No**, 0 Abstain, 2 Absent
- **[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 recommends the current nonsynthetic listing should remain but that a listing be added to § 205.60(b) so the National List accurately reflects the classification of the substance in use in organic processing.
Motion to add L-malic acid at § 205.605(b):
9 Yes, 0 No, 0 Abstain, 0 Absent



SUNSET REVIEWS (5-year review cycle)

MATERIAL	SUBCOMMITTEE	SUBCOMMITTEE VOTE
Orange pulp, dried	Handling	2 to relist, 5 to remove , 2 absent – this vote threshold would result in a recommendation to remove.
Potassium phosphate	Handling	4 to relist, 3 to remove , 2 absent – this vote threshold would not result in a recommendation to sunset but is a close vote.
Celery powder	Handling	7 to relist, 2 to remove , 0 absent - this vote threshold would not result in a recommendation to sunset but is worth monitoring.
Acids (Citric and Lactic)	Handling	9 to relist , 0 to remove, 0 absent
Calcium chloride	Handling	7 to relist , 0 to remove, 2 absent
Enzymes	Handling	7 to relist , 0 to remove, 2 absent
L-Malic acid	Handling	9 to relist , 0 to remove, 0 absent
Magnesium sulfate	Handling	6 to relist , 0 to remove, 3 absent
Microorganisms	Handling	7 to relist , 0 to remove, 2 absent
Perlite	Handling	6 to relist , 0 to remove, 3 absent
Potassium iodide	Handling	7 to relist , 0 to remove. 2 absent
Pullulan	Handling	7 to relist , 0 to remove. 2 absent
Yeast	Handling	7 to relist , 0 to remove, 2 absent
Activated charcoal	Handling	6 to relist , 0 to remove, 3 absent
Ascorbic acid	Handling	9 to relist , 0 to remove, 0 absent
Calcium citrate	Handling	6 to relist , 0 to remove, 3 absent
Collagen gel	Handling	6 to relist , 0 to remove, 3 absent
Ferrous sulfate	Handling	6 to relist , 0 to remove, 3 absent
Hydrogen peroxide	Handling	7 to relist , 0 to remove, 2 absent
Nutrient vitamins and minerals	Handling	6 to relist , 0 to remove, 3 absent
Peracetic acid/Peroxyacetic acid	Handling	7 to relist , 0 to remove, 2 absent
Potassium citrate	Handling	6 to relist , 0 to remove, 3 absent
Sodium acid pyrophosphate	Handling	7 to relist , 0 to remove, 2 absent
Sodium citrate	Handling	6 to relist , 0 to remove, 3 absent
Tocopherols	Handling	7 to relist , 0 to remove, 2 absent
Fish oil	Handling	6 to relist , 0 to remove, 1 abstention, 2 absent
Gelatin	Handling	6 to relist , 0 to remove, 3 absent
Seaweed, Pacific kombu	Handling	7 to relist , 0 to remove, 2 absent
Wakame seaweed	Handling	7 to relist , 0 to remove, 2 absent

FOR INFORMATION GATHERING

Discussion Documents

- [Ethylene](#) – addresses a petition to expand the use of ethylene gas for sprout inhibition in organic potatoes and onions. Ethylene is currently allowed at § 205.605(b) for use in postharvest ripening of tropical fruit and degreening of citrus. A limited scope Technical Review has been requested and is expected for consideration during the Spring 2025 meeting cycle.

Three questions are posed to the community for consideration to aid the Subcommittee in its deliberations.

Other topics of interest to Handling community

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

LIVESTOCK

TO BE VOTED ON

Proposals

- [Meloxicam](#) – petitioned for use for treating acute pain from various veterinary procedures, enhancing the animal’s welfare.

Motion to add at § 205.603(a) As disinfectants, sanitizer, and medical treatments as applicable

5 Yes, 0 No, 0 Abstain, 0 Absent

- [Annotation Change – DL-methionine](#) – based on feedback received via comments in response to the sunset review of methionine at the spring meeting, proposes to remove the annotation limiting methionine in poultry diets given these limits have a negative impact on organic poultry health.

Motion to amend the annotation of DL-Methionine on the National List at § 205.603(d)(1)

4 Yes, 0 No, 0 Abstain, 1 Absent

- [Annotation Change – Iodine](#) – proposal to restrict iodine to formulations that do not contain alkylphenol ethoxylates, which also includes nonylphenol ethoxylates (NPEs).

Motion to amend the listing for iodine at § 205.603(a)(16) and § 205.603(b)(4)

4 Yes, 0 No, 0 Abstain, 1 Absent

SUNSET REVIEWS (5-year review cycle)

MATERIAL	SUBCOMMITTEE	SUBCOMMITTEE VOTE
Atropine	Livestock	3 to relist, 0 to remove, 2 absent
Hydrogen peroxide	Livestock	3 to relist, 0 to remove, 2 absent
Iodine	Livestock	4 to relist, 0 to remove, 1 absent
Magnesium sulfate	Livestock	4 to relist, 0 to remove, 1 absent
Fenbendazole	Livestock	5 to relist, 0 to remove, 0 absent
Moxidectin	Livestock	5 to relist, 0 to remove, 0 absent

MATERIAL	SUBCOMMITTEE	SUBCOMMITTEE VOTE
Peracetic acid/Peroxyacetic acid	Livestock	4 to relist, 0 to remove, 1 absent
Xylazine, Tolazoline	Livestock	5 to relist, 0 to remove, 0 absent
Oxalic acid dihydrate	Livestock	5 to relist, 0 to remove, 0 absent
DL-methionine	Livestock	5 to relist, 0 to remove, 0 absent
Trace minerals	Livestock	3 to relist, 0 to remove, 2 absent
Vitamins	Livestock	4 to relist, 0 to remove, 1 absent
Hydrogen peroxide	Livestock	7 to relist, 0 to remove, 2 absent

Other topics of interest to livestock community:

- Parties might be interested in these topics found elsewhere on this agenda: [Research Priorities](#), [Climate Induced Farming Risk and Crop Insurance](#), [Inert Ingredients in Pesticide Products](#), [Residue Testing for a Global Supply Chain](#), [Risk-based Certification](#), and [Consistency in Organic Seed Use](#).

CROPS

TO BE VOTED ON

Proposals

- Carbon dioxide** – petitioned for use as a plant or soil amendment with an annotation to restrict the source of carbon dioxide to byproduct sources.
Motion to add carbon dioxide at § 205.601(j) with the annotation: must be sourced as a byproduct
6 Yes, 2 No, 0 Abstain, 1 Absent
- Compost Production for Organic Agriculture** – proposal recommends new language for the definition of compost, and for composting requirements.
The Subcommittee declined to act on a petition which seeks to broaden compost feedstocks to allow a de minimis amount of compostable plastics that meet ASTM standards for compostability. The Subcommittee expressed that the National List petition process would be the appropriate process for evaluation and recommendation of synthetic materials potentially present in compost. The Subcommittee did not see reason to change this process to allow for a categorical allowance for synthetic substances in compost feedstock, noting that even if these substances meet defined ASTM standards, the Organic Foods Production Act and National List criteria require the Board’s review of synthetic allowances on the National List. Instead, the Board is initiating a review of resin formulated products and fiber-based products that meet ASTM compostability standards to determine if these products align with organic production. The review of resin formulated products and fiber-based products that meet ASTM compostability standards is not on this meeting’s agenda.
Motion to amend § 205.2 Terms Defined:
Compost – The product of managed aerobic, biological decomposition of plant and/or animal materials, and/or permitted synthetic compost feedstocks at § 205.601(c). The product will have undergone mesophilic and thermophilic temperatures, which significantly reduce the viability of pathogens and weed seeds, and stabilize the carbon such that it is beneficial to plant growth.
8 Yes, 0 No, 0 Abstain, 1 Absent

Motion to amend § 205.203(c) Soil fertility and crop nutrient management practice standard:

(2) Composted plant and animal materials and/or permitted synthetic compost feedstocks at § 205.601(c) produced through a process that:

- (i) Maintains aerobic conditions at a minimum temperature at or above 131 F for 3 days using a contained/in-vessel process or a mechanically forced/aerated static pile process; or
- (ii) Maintains aerobic conditions in a windrow process at or above 131 F for 15 days (which do not have to be consecutive), during which period, the materials must be turned a minimum of 5 times.

8 Yes, 0 No, 0 Abstain, 1 Absent

SUNSET REVIEWS (5-year review cycle)

MATERIAL	SUBCOMMITTEE	SUBCOMMITTEE VOTE
Soaps, ammonium	Crops	7 to relist, 0 to remove, 2 absent
Oils, horticultural As insecticides (including acaricides or mite control)	Crops	7 to relist, 0 to remove, 2 absent
Oils, horticultural As plant disease control.	Crops	7 to relist, 0 to remove, 2 absent
Pheromones	Crops	5 to relist, 0 to remove, 4 absent
Ferric phosphate	Crops	8 to relist, 0 to remove, 1 absent
Potassium bicarbonate	Crops	5 to relist, 0 to remove, 4 absent
Magnesium sulfate	Crops	6 to relist, 0 to remove, 3 absent
Hydrogen chloride	Crops	8 to relist, 0 to remove, 1 absent
Ash from manure burning	Crops	7 to relist, 0 to remove, 2 absent
Sodium fluoaluminate (mined)	Crops	8 to relist, 0 to remove, 1 absent

FOR INFORMATION GATHERING

Discussion Documents

- [Pear Ester](#) – addresses a petition 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.

A technical review was conducted on pear ester and serves as the basis for this discussion document. The Subcommittee seeks public comment regarding any human health and environmental concerns pertaining to pear ester, as well as any other input regarding this substance.

Other topics of interest to crops community:

- Parties might be interested in these topics found elsewhere on this agenda: [Ethylene petition](#), [Excluded Methods - TBD List/induced mutagenesis](#), [Research Priorities](#), [Climate Induced Farming Risk and Crop](#)



[Insurance](#), [Inert Ingredients in Pesticide Products](#), [Residue Testing for a Global Supply Chain](#), [Risk-based Certification](#), and [Consistency in Organic Seed Use](#).

OTHER TOPICS INCLUDING MATERIALS, COMPLIANCE, ACCREDITATION AND CERTIFICATION

TO BE VOTED ON

Proposals

- [Climate Induced Farming Risk and Crop Insurance](#) – proposal continues the discussion on how the Risk Management Agency can better serve transitioning and organic producers in managing climate-induced risk on the farm. In particular, the Subcommittee recommends RMA offer risk management options that do not disincentivize transition to organic production. The Subcommittee offers five specific areas for improvement.
Motion to accept the proposal: **8 Yes**, 0 No, 0 Abstain, 0 Absent
- [Research Priorities 2024](#) – proposal details the Board’s annual list of research priorities, which this year includes an effort to categorize and differentiate highest priority topics from the ongoing list.
Motion to accept the proposal: **7 Yes**, 0 No, 0 Abstain, 1 Absent
- [Inert Ingredients in Pesticide Products](#) – proposal concludes the Board’s consideration of a work agenda request from NOP to recommend a replacement for outdated references in the USDA organic that determine the allowance of inert ingredients used in pesticide products allowed in organic production. The Subcommittee recommends two options it considers viable. One is to list inert ingredients individually on the National List, starting with the substances currently in use in organic production. The other option is to allow inert ingredients that have been reviewed and approved by EPA for inclusion in pesticide formulas but would restrict this group by only allowing inerts allowed in formulations that are exempt from the requirement of tolerance. The Subcommittee provides further detail on the sunset process by which these substances would be reviewed and renewed, as well as the pros and cons of each option. Refer to the recommendation for complete motion language.
Motion to accept the proposal, which proposes two viable listing motion options for NOP consideration: **7 Yes**, 0 No, 0 Abstain, 1 Absent

FOR INFORMATION GATHERING

Discussion Documents

- [Residue Testing for a Global Supply Chain](#) – continues the discussion initiated in fall 2023 to update guidance documents in the NOP Handbook pertaining to residue sampling, lab selection, the list of prohibited pesticides for NOP residue testing, responding to the testing results, and other related guidance documents. The Subcommittee’s stated goal is to aid the NOP in updating these guidance documents so residue sampling remains a critical verification tool in the certification process, and offers detailed suggestions for updates.
The discussion document includes an extensive series of questions to stakeholders to inform the Subcommittee’s continued discussion.
- [Risk-based Certification](#) – explores the practice of risk-based oversight and risk assessment in organic certification and whether existing resources are sufficient to support and direct certifiers and certified operations in their proficiency with risk-based oversight. The discussion document provides a gap analysis of existing resources, seeks to understand what resources are serving the organic community well, and presents several questions to stakeholders regarding risk-based practices and needs.

- **Consistency in Organic Seed Use** – the Subcommittee seeks to understand the current state of organic seed use, potential tools for increasing the amount and variety of organic seed that is commercially available, and methods for strengthening enforcement of the existing commercial availability requirements. A number of questions are posed to stakeholders to inform their discussion.
OTA has convened an Organic Seed Task Force to respond to the Subcommittee’s questions and inform their discussion. Please [reach out](#) to join the Task Force work.
 - **Excluded Methods - TBD List/induced mutagenesis** – addresses induced mutagenesis (IM) methods used without in vitro recombinant DNA technology, and bases much of the discussion on the Technical Review that was requested specifically on IM. The Subcommittee seeks to determine whether IM should be classed as an excluded method and if so, how best to identify and restrict seeds produced using IM. Several questions are posed to the community for consideration to aid the Subcommittee in its deliberations.
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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.