



## SPRING 2018 National Organic Standards Board (NOSB)

### The Organic Trade Association (OTA) Meeting Report

On April 25-27, the National Organic Standards Board (NOSB) held its biannual public meeting in Tucson, Arizona. 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. All meeting materials are available on OTA's [Spring 2018 NOSB meeting](#), and include the proposals and discussion documents and OTA's comments.

#### ***NOSB continues to be democratic arena for organic standards development and continuous improvement***

Over the course of three days, NOSB, under the leadership of NOSB Chair Tom Chapman, discussed eight proposals, 40 inputs on the National List scheduled to expire in 2020 and two discussion documents. NOSB received 1,600 written comments prior to the meeting, and listened to 13.5 hours of oral testimony received from approximately 48 commenters during two webinars and 85 commenters during the in-person meeting. In response to extensive research and public comment, NOSB voted on eight proposals and considered two discussion documents. Of the eight proposals, six **PASSED** and two **FAILED**. For more detail, see the voting chart and discussion sections below.

#### ***Undersecretary of USDA's Marketing and Regulatory Programs recognizes organic integrity as a USDA priority***

The meeting kicked off with updates from the National Organic Program (NOP) including opening remarks from Ruihong Guo (NOP's Acting Deputy Administrator) and Greg Ibach (the Undersecretary of USDA's Marketing and Regulatory Programs). Undersecretary Ibach presented the Secretary of Agriculture's guiding principles for the National Organic Program, placing emphasis on USDA's priority to protect organic integrity and the organic seal, and deliver efficient and effective oversight. He pitched USDA's Process Verified Program as a way for organic producers to further differentiate their products in lieu of NOSB recommendations and NOP notice and comment rulemaking. This suggestion came despite the fact that his department for close to 18 months has stalled release of an application submitted by OTA to develop a certification program for producers in transition to organic certification, the National Certified Transitional Program. Associate Deputy Administrator Jenny Tucker also delivered a report on activity at NOP. The report focused largely on NOP's efforts to work with other programs within USDA to curb the import of fraudulent organic products, boots-on-the ground inspections of certifiers and operations in response to complaints, and rulemaking to bring NOP current with NOSB's recommendations on materials recommended to be added to the National List. Details, including a link to a training for certifiers on conducting investigations, can be viewed here: [National Organic Program Update \(pdf\)](#).

#### ***USDA responds to the need for increased oversight and enforcement of organic imports***

Increased oversight and enforcement of organic imports were the focus topics of the meeting, with a half-day dedicated to two expert panels followed by nearly two hours of subcommittee discussion. NOSB also listened to over 70 commenters addressing the topic. The board was completely engaged on the topic of enforcement and integrity. Fueled by an influx of information and testimony from public comments and the two expert panels, NOSB made a place for all members to discuss a dozen focus areas ranging from required certification for excluded operations

to inspector training and qualifications to increased residue testing. The Board highlighted some immediate steps it can take to advise USDA on curtailing fraudulent shipments to the U.S. and some longer-term projects, which will strengthen enforcement of the organic standards both domestically and across the globe. This discussion displayed the current Board's confidence and effectiveness in advising USDA on matters where there is unanimity among organic stakeholders. NOSB will continue its work and bring back developed proposals at future NOSB meetings, including one for the fall 2018 meeting.

***NOSB demonstrates balanced approach to preserving native ecosystems, combating fungal diseases and meaningful action on seed***

Other topics generating significant discussion included: 1) a proposal to eliminate the incentive to convert native ecosystems to organic production; 2) the allowance of Polyoxin D Zinc Salt to help organic crop producers combat fungal diseases such as mummy berry and powdery mildew; and 3) maintaining the genetic integrity of seed grown on organic land. NOSB's proposal on conservation of native ecosystems drew broad support and some criticism as it had the potential to impact small producers' ability to expand their operations into natural areas adjacent to their farms. NOSB listened to these concerns and adjusted the recommendation so that it would not affect producers clearing land that had not yet returned to a state of a native ecosystem. The consideration of Polyoxin D Zinc Salt illuminated the specific conditions necessary to convince NOSB that a new material is necessary in organic production. Comments were received on this petition from organic and conventional growers as well as university researchers. They all corroborated that this tool would resolve some ongoing production challenges for which organic producers do not have effective treatments. The Board also acknowledged that this substance would support producers growing in soil (rather than in containers). The discussion document on maintaining the genetic integrity of seed grown on organic land illustrated the balancing act that NOSB must perform in developing its recommendations. It must make fact- and data-driven decisions to move the organic seed industry forward without hamstringing producers with a dwindling diversity of seed genetics and production traits. NOSB will continue its work on seed integrity and bring forth a proposal for the fall 2018 meeting.

Overall, it was a very productive meeting and the tone was notably civil. The quality of the information delivered by the expert panels was excellent and very beneficial to NOSB as were the public comments. NOSB was very engaging, asking many insightful questions, and the dialogue between NOSB members was thoughtful and collegial.

***Looking forward!*** Fall 2018 meeting topics to look for include Import Oversight (proposal); Organic Seed Usage (proposal); Establishing a Seed Purity Standard (proposal); Packaging Substances used in Organic Food Handling - including BPA (discussion); 2020 Sunset materials (proposals); and Marine Materials on the National List (proposal)

***More details? More resources?*** Keep reading and check out the play-by-play coverage of the meeting provided on OTA's Twitter Account: <https://twitter.com/organictrade>.

## At-A-Glance Meeting Highlights:

- **PROPOSALS:** NOSB considered **EIGHT** proposals at this meeting. Of the eight proposals, **6 PASSED** and **2 FAILED**. Here's the breakdown:
  - **PASSED UNANIMOUSLY:** Definition of “emergency treatment” in organic livestock; Inspector Qualifications and Training; Reclassification of Magnesium Chloride (natural forms only); Petition to add Sulfur as a Molluscicide to the National List
  - **PASSED WITH 2/3 MAJORITY:** Petition to add Polyoxin D Zinc Salt as biofungicide in organic crop production; Eliminating the Incentive to Convert Native Ecosystems.
  - **FAILED:** Petition to add Sodium Dodecylbenzene Sulfonate (SDBS) to the National List as a direct sanitizer on fresh produce in handling; Petition to add Glycolic Acid for use as a teat dip in organic livestock production
- **DISCUSSION DOCUMENTS:** In addition to the **EIGHT** proposals voted on at the meeting, NOSB considered the comments received on **TWO** Discussion Documents. The Certification, Accreditation, and Compliance Subcommittee (CACS) requested feedback on 75 questions to help gain further insight on increased import oversight, while the Materials Subcommittee requested feedback on immediate steps to protect the genetic integrity of seed grown on organic land. NOSB received substantial comments on both topics. With respect to import oversight, CACS now has the monumental task of identifying the actions that will most effectively prevent organic fraud and working this information into a recommendation for the fall. On the topic of seed purity, the Materials Subcommittee will develop a proposal for the fall that includes three focus areas: 1) scoping the problem; 2) exploring theoretical thresholds on high-risk crops with a focus on testing protocols and associated costs; and 3) exploring a process to work with farmers to retain seed samples for future testing.
- **SUNSET 2020:** NOSB discussed 40 National List inputs undergoing the 2020 Sunset Review. Public comments were generally in favor of relisting the majority. Inputs that were highlighted due to concerns raised by the public are as follows:
  - **Crops:** Aqueous Potassium Silicate, Newspaper or other Recycled Paper; Elemental Sulfur, Liquid Fish Fertilizer, Ethylene, Microcrystalline Cheesewax
  - **Livestock:** Sucrose Octanoate Esters
  - **Handling:** Glycerides, Fructooligosaccharides, Gums, Lecithin, Tragacanth GumNOSB encourages stakeholders to submit public comments for the fall 2018 meeting about the necessity or essentiality of these materials for production/handling, their effects on the environment and human health, and the availability of natural/organic forms.
- **IMPORT OVERSIGHT PANELS:** Two expert panels--a certifier panel and a trade panel--addressed NOSB at the meeting to provide further insight on opportunities and strategies to increase integrity in the global organic control system. Panelists answered several questions from NOSB, and focused on actions and recommendations that will have the greatest impact on improving the oversight and control procedures used by USDA’s Agricultural Market Service, certifiers, and operations to verify organic claims for imported products. Common suggestions from the trade panel included mandatory certification for currently excluded operations, putting a system in place for inspections at U.S. ports, increased use of testing, prioritizing use of organic (HS) codes, improving timing and communication around NOP’s

complaint system, utilization of technology such as block chain, and whether to pursue a 332 study. Common suggestions from the certifier panel included increased qualifications and training for inspectors, a requirement to report crop acreage to the NOP integrity database, improved collaboration with certifiers on investigations, and increased tracking of import/export activity.

The **certifier panel** consisted of Albrecht Benzing (CERES GmbH), Silke Fuchshofen (Organic Insights Inc.), Jake Lewin (California Certified Organic Farmers) and Sam Welsch (OneCert). The **trade panel** consisted of John Bobbe (OFARM), Peter Carlson (Terra Ingredients LLC), Mike Dill (Organically Grown Company), Erin Heitkamp (Pipeline Foods), and Monique Marez (Organic Trade Association).

- **NEW NOSB MEMBERS ANNOUNCED:** OTA welcomes the appointments of two new board members: Eric Schwartz (Handler, CA) and Dr. James Greenwood (Environmentalist/Resource Conservationist, CA)
- **LOOKING FORWARD TO THE FALL 2018 NOSB MEETING – MAJOR TOPICS TO PREPARE FOR**
  - Import Oversight (proposal)
  - Organic Seed Usage (proposal) and Establishing a Seed Purity standard (proposal)
  - Packaging substances used in organic food handling - including BPA (discussion)
  - Vote: 2020 Sunset materials (see flagged inputs above)
  - Marine Materials on the National List (proposal)

View the [NOSB Work Agenda \(pdf\)](#)

## At-A-Glance Voting Chart

Subcommittee	Agenda Item	Motion and Full Board Vote	Fail/Pass/Next Steps
Compliance, Accreditation and Certification	<b>Eliminating the Incentive to Convert Native Ecosystems to Organic Crop Production</b>	<b>Motion:</b> To approve the proposal on eliminating incentives to convert native ecosystems to organic crops production <b>Full Board Vote:</b> 11 Yes, 1 No, 1 Abstain	PASSED for rulemaking upon NOP approval
Compliance, Accreditation and Certification	<b>Import Oversight</b>	<b>Discussion only</b>	NOSB will bring a proposal to the fall 2018 meeting
Compliance, Accreditation and Certification	<b>Inspector Qualifications and Training</b>	<b>Motion:</b> To approve the proposal on inspector qualifications. <b>Full Board Vote:</b> Unanimous - 13 Yes, 0 No, 0 Abstain, 0 Absent	PASSED for rulemaking upon NOP approval
Crops	<b>Polyoxin D Zinc Salt (Petition to Add)</b>	<b>Classification:</b> Synthetic <b>Listing Motion:</b> List on 205.601	PASSED for rulemaking upon NOP approval

		<b>Full Board Vote:</b> 11 Yes, 1 No, 1 Abstain; 0 Absent	
Crops	<b>Sulfur as a Molluscicide</b> (Petition to Add)	<b>Classification Motion:</b> Synthetic (8 Yes, 0 No, 1 Absent) <b>Listing Motion:</b> List on 205.601 <b>Full Board Vote:</b> Unanimous - 13 Yes, 0 No, 0 Abstain, 0 Absent	<b>PASSED for rulemaking upon NOP approval</b>
Livestock	<b>Glycolic Acid</b> (Petition to Add)	<b>Classification Motion:</b> Synthetic <b>Listing Motion:</b> List on 205.601 <b>Full Board Vote:</b> 7 Yes, 6 No, 0 Abstain, 0 Absent	<b>FAILED – Glycolic Acid will continue to be prohibited in organic livestock production</b>
Livestock	Definition of “ <b>emergency treatment</b> ” for parasiticide use in organic livestock	<b>Motion to approve the proposal</b> <b>Full Board Vote:</b> Unanimous - 13 Yes, 0 No, 0 Abstain, 0 Absent	<b>PASSED for rulemaking upon NOP approval</b>
Handling	<b>Magnesium Chloride:</b> Reclassification from synthetic to non-synthetic	<b>Motion:</b> To reclassify Magnesium Chloride from 205.605(b) to 205.605(a) of the National List <b>Full Board Vote:</b> Unanimous - 13 Yes, 0 No, 0 Abstain, 0 Absent	<b>PASSED for rulemaking upon NOP approval</b>
Handling	<b>Sodium Dodecylbenzene Sulfonate SDBS</b> (Petition to Add)	<b>Motion to add SDBS to 205.605(b)</b> <b>Full Board Vote:</b> (0 Yes, 13 No, 0 Abstain, 0 Absent)	<b>FAILED – SDBS will continue to be prohibited as a no-rinse sanitizer</b>
Materials/GMO	<b>Protecting Organic Integrity of Seed Grown on Organic Land</b>	<b>Discussion Only</b>	<b>NOSB will bring a proposal to the fall 2018 meeting</b>

\*(National List References: 205.601=allowed synthetics for crops / 205.603=allowed synthetics for livestock / 205.603(b)=prohibited non-synthetic in livestock / Handling: 205.605(a)=allowed non-synthetics / 205.605(b) = allowed synthetics / 205.606=allowed non-OG agricultural ingredient when OG is not available)

## Discussion on Agenda Topics

- **IMPORT OVERSIGHT (DISCUSSION):** OTA gained strong recognition for its GOSCI Best Practice Guide and several of its GOSCI task force members sat on the import oversight panels delivering excellent perspective and suggestions. In response to the 75 questions CACS asked, the following suggested actions were notable and will likely be captured in a fall 2018 proposal: 1) Require everyone in the supply chain to be certified; 2) Improve timing and communication around NOP’s complaint procedures; 3) Require “organic” designation on all documentation associated with organic products; 4) Aggregate and report global organic crop acreage; 5) Increase collaboration between NOP, APHIS and CBD; 6) Provide clarification on the types of operations that must be certified under the existing regulations; 7) Prioritize and increase the use of HS codes (Harmonized Commodity Description and Coding System; 8) Increase on-site surveillance at ports; and 9) increase oversight of certifiers and increase qualifications and training for inspectors.
- **INSPECTOR QUALIFICATIONS AND TRAINING (PROPOSAL):** The take-home message delivered during public comments and expressed by NOSB was that NOP’s requirements for inspectors should emphasize knowledge, skills, experience, training (including continuing training),

and evaluation. Many public commenters expressed support for a licensing program for inspectors and accreditation for training programs. However, there were concerns about the impact such a program would have on certification fees. During the NOSB discussion on inspector training, it was suggested that an external body like the Accredited Certifier Association could vet the NOP's final plan for inspector training, that training must match the type of inspections done, and that auditors need to be trained when they do the inspection of the certifiers. NOP brought forward the possibility that an organic inspector and reviewer training module could be developed and incorporated into USDA's Learning Management System. This is an area that NOP is actively looking to solicit contracts for program development. It was also noted that apprenticeships are critical, but that the current system does not incentivize apprenticeships because the trainers must split pay evenly with their apprentices.

- **ELIMINATING THE INCENTIVE TO CONVERT NATIVE ECOSYSTEMS TO ORGANIC FARMS (PROPOSAL):** Numerous public comments were delivered on this topic. There was broad support for NOSB's intent to disincentivize the conversion of native ecosystems to organic production, yet some commenters were wary of the specific language proposed by NOSB and the impacts that may occur to organic farmers looking to expand production areas into adjacent land that has recovered from previous land clearing. The most notable concerns were raised by dairy and crop farmers in the Northeast. NOSB discussed the overall concern that the proposal addressed, the need for additional guidance from NOP to certifiers, and the specific concerns raised by public commenters. At the end of the discussion, NOSB voted to pass the proposal with minor changes. The vote against the proposal was cast by NOSB member A-Dae Briones who based her opposition to the proposal singularly on the fact that Native populations were not represented in the comments and that there may be concerns that were not addressed by this significant land-holder.
- **GLYCOLIC ACID (PROPOSAL):** NOSB evaluated the petition to add glycolic acid as a pre-and post-teat dip on organic dairy production. There are currently a number of alternative products allowed: glycerin, iodine, chlorhexidine, and hydrogen peroxide. There were few public comments in support of adding the material. However, most cited the lack of experience with this material and the satisfactory efficacy of currently allowed alternatives. Some commenters indicated that additional options for dairy producers would be helpful, so that different products can be used in rotation to reduce the potential for disease resistance. In the end, there was not a super majority of NOSB members who felt that organic dairy producers expressed a need for this material, and the vote to add glycolic acid to the National List failed.
- **DEFINITION OF "EMERGENCY TREATMENT" FOR PARASITICIDES IN ORGANIC LIVESTOCK PRODUCTION (PROPOSAL):** NOSB has worked on this topic for a number of meetings. The rationale for addressing "emergency treatment" stemmed from previous Board decisions to reduce withholding times and annotation restrictions on synthetic parasiticides allowed in organic dairy production. There were concerns that reducing these restrictions would lead to wider use of the material, and there was a need to ensure that synthetic parasiticides were only used in "emergency treatments." The recommendation included a proposed definition for "emergency treatment" and outlined a stepwise approach, which focused on prevention first, that would be included in the organic standards relating to organic livestock healthcare. NOSB

received comments that generally were in support of its recommendation, and the full Board voted to pass the proposal.

- **SODIUM DODECYLBENZENE SULFONATE (SDBS) (PROPOSAL):** Ecolab Inc. petitioned for sodium dodecylbenzene sulfonate (SDBS) to be added to the National List as an antimicrobial for direct use in treating fruits and vegetables in the premises of organic food retail establishments. The Handling Subcommittee voted against adding this material to the National List, noting the availability of allowed natural and synthetic alternatives. The subcommittee also raised questions and requested comments on the importance of having the ability to rotate among several materials in an antimicrobial regime to reduce the incidence of microbial resistance. The large majority of the comments argued against the need to add SDBS to the Handler's Toolbox in favor of available alternatives. The comments in favor of adding SDBS came from Ecolab Inc. or from organizations that advocated for an expanded toolbox option. Several commenters also expressed support for NOSB's work agenda item to take a closer look at the role of sanitizers in organic handling and the use of an expert panel to assist in the process. In the absence of any public comment from industry in favor of adding SDBS, NOSB concluded that this material is not essential. The motion to add it to the National List failed unanimously. The vote was consistent with OTA's comments.
- **MAGNESIUM CHLORIDE (PROPOSAL):** Magnesium chloride can be produced non-synthetically from a variety of natural commercial sources including seawater, terminal lake brines, subsurface brine deposits, and mined mineral deposits. The Handling Subcommittee proposed that magnesium chloride remain on the National List, but be reclassified to allow non-synthetic forms only. All comments were in favor of this change. The Organic Materials Review Institute (OMRI) and OTA requested that NOP provide examples of natural and synthetic forms through guidance and rulemaking to assist certifiers and Material Review Organizations (MROs) with future classification decisions. The full Board passed the proposal unanimously.

**POLY D ZINC SALT (PROPOSAL):** NOSB's evaluation of Polyoxin D Zinc Salt focused on whether there was a need for new fungal disease controls in organic crop production. This was the second round of review for this material, and NOSB was provided with new studies that detailed the lack of significant environmental impact from the use of Polyoxin D Zinc Salt as well as the various crop diseases for which organic farmers do not have adequate tools like mummy berry, cottonball, botrytis, white mold, and powdery mildew. NOSB heard many comments from organic growers supporting the petition and only a few comments, exclusively from environmental groups, against the petition. Some NOSB members were sympathetic to the fact that this material is helpful to farmers who are growing crops in the ground, and that farmers who grow in containers generally do not have the same disease pressure, as they can replace growing media should issues arise. The Board ultimately voted to approve the proposal and recommend adding Polyoxin D Zinc Salt to the National List.

**SULFUR AS A MOLLUSCIDE (PROPOSAL):** Sulfur is currently allowed in organic production as a soil amendment and for control of insects and disease. This petition sought to allow sulfur for the control of snails and slugs. NOSB heard few comments from growers focused squarely on the need to allow this material for this specific purpose. However, Board members brought forward new thinking on the importance for organic farmers to have more tools at their disposal for the control of snails and slugs. NOSB member Dave Mortensen

brought up the concept that as more organic farmers convert to no-till systems, snails and slugs will be an increasingly significant pest, and that control of these pests should not be a disincentive to reduce tillage. Sulfur garnered significant conversation, as NOSB looked at impacts that dusting sulfur (used as an insect and disease control) may have on farmworker health. However, in this application, sulfur is pelletized into a slug and snail bait, so these concerns are not applicable. In the end, NOSB voted unanimously to expand the allowed uses of sulfur to include its use as a molluscicide.

- **PROTECTING THE GENETIC INTEGRITY OF SEED GROWN ON ORGANIC LAND (DISCUSSION):** In 2012, 2013, 2016 and 2017, the Materials/GMO Subcommittee issued discussion documents on the topic of “seed purity” (i.e., keeping seed stock used for organic production free from contamination by GMOs). NOSB has been unable to move ahead with a proposal because of an agreed- upon need to collect data, per crop, on the extent of unintended GMO contamination in seed (organic and non-organic) in order to develop appropriate thresholds. The subcommittee took another pass at the issue in attempt to identify any new action steps to take. Many of the comments received were consistent with or recycled from previous comment periods and all comments expressed the importance of this topic. The overriding message throughout all comments: WHATEVER IS DONE MUST BE DONE CAREFULLY. The Materials Subcommittee aims to bring forth a proposal in the fall to focus on three areas: 1) Scoping the problem with the intent to ask seed companies to share their work to gain insight on appropriate thresholds, 2) Establish exploratory thresholds (theoretical only), starting with at-risk crops, and look at sampling, protocols, testing procedures, detection limits and associated testing costs, and 3) Seed sampling and saving. As per CCOF’s recommendation, work with farmers to retain seed samples and look at a proposal that would support a requirement for organic producers to save a sample of the seed they plant so that it is available for testing should an investigation or question come into play.

**SUNSET REVIEW 2020 –** NOSB must review every substance (input) on the National List every five years to confirm that it continues to meet all required criteria under the Organic Foods Production Act and USDA organic regulations. This is called “Sunset Review.” Any substance NOSB votes for removal moves forward for USDA approval and additional rulemaking. The inputs below were discussed at the meeting in Tucson, AZ. NOSB will be voting on whether to renew or remove the inputs from the National List at the fall 2018 meeting in St. Paul, MN.

\***Asterisk and highlight** indicates inputs flagged by NOSB due to concerns raised by the public. NOSB encourages stakeholders to submit public comments for the fall 2018 meeting about the necessity or essentiality of these materials for production/handling, their effects on the environment and human health, and the availability of natural/organic forms.

Use Area	National List Input	Discussion
Crops	<b>Alcohols (Ethanol and Isopropanol):</b> Used to disinfect tools, growing supplies, to prevent spread of diseases	Commenters supported relisting, as alcohols are critically important for disinfecting crop production equipment like pruners.
Crops	<b>Newspaper or other recycled paper:</b> Used as a mulch for weed control or as a compost feedstock	Significant discussion and comments surrounded the recent decision by NOP to disallow the use of paper-chain pots used for transplanting annual seedlings primarily on smaller organic vegetable farms. NOSB discussed the need to evaluate this new use before approving its use and urged industry to submit a

		petition to expand the use of newspaper or other recycled paper and allow paper-chain pots. NOSB also discussed whether the annotation that prohibits the use of colored inks and glossy paper was still appropriate.
Crops	<b>Plastic mulch and covers:</b> Used for weed control, but cannot contain PVC materials and must be removed from the field at the end of the growing season	NOSB generally heard that plastic mulch is still necessary for the production of certain organic crops. The review of this substance was used as a platform for calls from the public to revisit the current restrictions on biodegradable bio-based plastic mulches to allow biodegradable mulches that are not sourced entirely from bio-based feedstock. NOSB indicated it may request this be placed on its work plan for the Fall 2018 meeting.
Crops	<b>*Aqueous Potassium Silicate</b>	NOSB did not hear any comments from the public that this material is necessary or that it is even in use by organic farmers. The lack of public comment led NOSB to flag this material for a potential vote to remove it in the fall 2018 meeting.
Crops	<b>*Elemental Sulfur:</b> Used for pest and disease control and as a fertilizer to correct sulfur deficiencies in soil	NOSB acknowledged that sulfur is one of the foundational crop production tools. However, there are concerns arising around the potential for dusting sulfur to have negative effects on farmworker health, and NOSB will continue to evaluate whether it is appropriate to restrict sulfur only to the wettable forms of the substance.
Crops	<b>Lime Sulfur:</b> Used for pest and disease control	NOSB and public commenters indicated lime sulfur is still critical for specific applications in the tree fruit industry. There was strong support for its relisting.
Crops	<b>Sucrose octanoate esters:</b> Used for pest control (mode of action, soft bodied insects, effective, not harmful to fish or bees)	NOSB did not hear many comments from the public on this topic. It may have use in reducing the need for copper to control algae in aquatic rice production and it may have gained popularity as an irrigation algicide. NOSB will continue to monitor comments on its continued allowance.
Crops	<b>Hydrated Lime:</b> Used for disease control	Hydrated lime remains important for controlling certain plant diseases, and NOSB acknowledged its necessity.
Crops	<b>*Liquid Fish Products:</b> Used as a fertilizer and soil amendment	Although there is broad support for relisting liquid fish products, NOSB focused on two issues around the production of liquid fish fertilizer. First, concerns around the harvesting of wild fish exclusively for organic fertilizer production prompted NOSB to collect more information on how much this happens and whether additional restrictions would be needed so that growth in organic production does not negatively impact wild fish stocks. Second, manufacturing processes vary for liquid fish products, and NOSB heard from public commenters that it may want to consider additional flexibility on the minimum pH allowed in the manufacturing and stabilization of liquid fish products.
Crops	<b>Sulfurous Acid:</b> As plant or soil amendment —for on-farm	NOSB heard from numerous farmers, primarily in the arid west, that sulfurous

	generation of substance utilizing 99% purity elemental sulfur	acid is necessary for the continued success of many crops and is the only effective means to lower the pH of irrigation water.
Crops	<b>*Ethylene:</b> Used to regulate pineapple flowering	Ethylene continues to be a material garnering comments both in opposition and supportive of its relisting. Comments opposed argue that its allowance is purely based on economics and pineapple plants would continue to fruit even without its allowance. Comments in support describe how ethylene is necessary to coordinate flowering so that adequate quantities of fruit can be harvested for export markets. Commenters also described that pineapple producers who do not use ethylene are primarily selling into a local market, while those dependent on export markets see ethylene as necessary.
Crops	<b>*Microcrystalline Cheesewax:</b> Used to prevent undesirable fungi growth in log grown mushroom production	Microcrystalline cheesewax is used to seal plug spawn on log-grown mushroom operations. NOSB flagged this material as potentially no longer necessary citing a lack of public comment as well as evolutions in mushroom production that has rendered log grown production obsolete.
Livestock	<b>Potassium Chloride (prohibited)</b>	NOSB heard from the public that potassium chloride remains necessary for crop producers facing specific nutrient deficiencies, and that there was adequate availability of products that meet the restrictive annotation permitting its use.
Livestock	<b>Alcohols (Ethanol and Isopropanol):</b> Used as a sanitizer and disinfectant	NOSB heard from the public that potassium chloride remains necessary for crop producers facing specific nutrient deficiencies, and that there was adequate availability of products that meet the restrictive annotation permitting its use.
Livestock	<b>Aspirin:</b> Used to reduce inflammation	No discussion on this material, and public comments were supportive of its relisting.
Livestock	<b>Biologics (Vaccines):</b> Used to prevent disease	No discussion on this material, and public comments were supportive of its relisting.
Livestock	<b>Electrolytes:</b> Used to replenish electrolytes in organic livestock	No discussion on this material, and public comments were supportive of its relisting.
Livestock	<b>Glycerin:</b> Used in livestock teat dips	NOSB heard from public commenters that glycerin was still necessary for formulation of iodine teat dips. There was discussion on the potential or certified organic forms of glycerin to be used, but currently teat dip manufacturers are not working on formulating products with organic glycerin.
Livestock	<b>Phosphoric Acid:</b> Used as an equipment cleaner	No discussion on this material, and public comments were supportive of its relisting.
Livestock	<b>Hydrated Lime:</b> Used as an external parasiticide	NOSB heard that hydrated lime is necessary for treating external parasites and did not indicate any intention to propose its removal.

Livestock	<b>Mineral Oil:</b> Used for topical treatments and as a lubricant	Public comments were largely in support of relisting mineral oil. There was NOSB discussion around the various uses and whether it is allowed as an oral treatment.
Livestock	<b>*Sucrose Octonoate Esters:</b> Used as an external parasiticide	Sucrose Octonoate Esters are used to control varroa mites in organic apiculture. Since there are no apiculture standards, it was previously added to the list of approved materials for organic livestock production. NOSB did not receive any comments supporting its relisting, and discussion revealed that formic acid is now a better alternative for controlling varroa mites. NOSB called for organic beekeepers to submit comments on the necessity of this substance.
Handling	<b>Calcium carbonate:</b> Used primarily for the manufacture of organic corn tortillas and organic sugar. Does not remain in final production (processing aid).	Used commonly as a stabilizer in organic soy cheese. Strong support for the relisting. No major concerns noted.
Handling	<b>Flavors:</b> Must be derived from non-synthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative	The majority of commenters noted that natural flavors are essential and should remain on the National List. Most commenters are in favor of a requirement to use organic flavors when they are available and support OTA's petition.
Handling	<b>*Gellan gum (CAS # 71010-52-1) – high acyl form only</b>	Generally strong support for the relisting as it provides a good alternative to carrageenan.
Handling	<b>Oxygen.</b> Modified atmosphere.	No concerns. USDA will likely not be taking away our oxygen.
Handling	<b>Potassium chloride:</b> A yeast food used in the brewing industry to improve brewing and fermentation and in the jelling industries.	Strong support for its relisting, no concerns.
Handling	<b>Alginates:</b> Seaweed derivatives used as stabilizers and water retainers in beverages, ice creams, salad dressings, and confections. Provides heat stable gels.	Strong support for continued listing. However, some commenters would like to see it broken down into specific types.
Handling	<b>Calcium hydroxide:</b> Used primarily for the manufacture of organic corn tortillas and organic sugar. Does not remain in final production (processing aid).	Strong support for continued listing. No concerns.
Handling	<b>Ethylene:</b> Used for postharvest ripening of tropical fruit and degreening of citrus.	Strong support for continued listing. Commenters explained that it is an essential tool for small, medium and large producers and handlers.
Handling	<b>*Glycerides (mono and di):</b> Used for drum drying of food such as organic potato flakes. Prevents the potatoes from sticking to the drum. Not present in final product (processing aid).	NOSB is looking for more comments on the essentiality of this material. Are there alternatives? Some commenters explained that alternatives are available.
Handling	<b>Magnesium stearate:</b> Used as an excipient and flow agent. Binding agent in tablets.	Strong support for continued listing.
Handling	<b>Phosphoric acid:</b> Cleaning of food-contact surfaces and	Strong support for continued listing.

	equipment only. Used in dairy lines.	
Handling	<b>Potassium carbonate:</b> Cocoa products, (Dutch alkali process). Extractant (often in combination with potassium hydroxide). Boiler water additive.	Strong support for continued listing. Provides a low-sodium alternative.
Handling	<b>Sulfur dioxide:</b> Allowed only in wine labeled "made with organic grapes," Provided, That, total sulfite concentration does not exceed 100 ppm. Used to prevent spoilage of wine and to retain color.	Strong support for continued listing. Commenters pointed to the fact that it is not allowed under the USDA seal. Essential to storage and handling.
Handling	<b>Xanthan gum:</b> Emulsifier & stabilizer thickener	Strong support for continued listing. One of the most common gums used. No concerns.
Handling	<b>*Fructooligosaccharides (CAS # 308066–66–2)</b>	Some commenters are raising questions about whether this ingredient is essential. NOSB is requesting additional comments.
Handling	<b>Gums—water extracted only (Arabic; Guar; Locust bean; and Carob bean)</b> <b>Lecithin - de-oiled:</b> Wide range of food application, which includes emulsification, release properties, wetting, dispersing, and texturization	Strong support for the continued listing. Commenters acknowledged the availability of organic forms but the supply is fragile. Some commenters would like to see them individually listed. NOSB members raised questions about how to determine whether a supply of an ingredient is commercially available. How much is enough?
Handling	<b>*Tragacanth gum:</b> used as a thickener and emulsifier	NOSB is requesting additional comments from trade on the essentiality of this gum. It did not receive very many comments indicating that it may not be needed.

\*(National List References: 205.601=allowed synthetics for crops / 205.603=allowed synthetics for livestock / 205.603(b)=prohibited non-synthetic in livestock / Handling: 205.605(a)=allowed non-synthetics / 205.605(b) = allowed synthetics / 205.606=allowed non-OG agricultural ingredient when OG is not available)

**Plan to attend the fall 2018 NOSB meeting!** The next NOSB meeting will take place October 24 – 26 at the InterContinental Saint Paul Riverfront Hotel in St. Paul, MN. Mark your calendar and stay tuned for more information to come!

**Organic Trade Association's NOSB Report:** As a service to its members, OTA attends National Organic Standards Board 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. OTA members are alerted to steps in rulemaking through OTA's *News Flash* or other member communications.

OTA's **NOSB Report archives** are available on OTA's website. Please contact [Gwendolyn Wyard](#), OTA's Vice President of Regulatory and Technical Affairs or [Nathaniel Lewis](#), OTA's Farm Policy Director, for more information.