

Organic Trade Association’s Spring 2024 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 in Milwaukee, WI. 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 and comments:** The spring 2024 meeting got underway with a call to order and opening remarks from Dr. Jennifer Tucker, the National Organic Program (NOP) Deputy Administrator. The welcome included an introduction of NOP staff, after which Dr. Tucker introduced WI Secretary of Agriculture Randy Romanski who offered some highlights of organic production in WI and the importance of getting a farm bill completed to ensure continued investment in WI agriculture and beyond.
- **NOSB Chair Report:** After introducing NOSB members, NOSB Chair Kyla Smith offered her insights & background, encouraged stakeholders to remain engaged in the rulemaking process, and highlighted the [open nominations for five NOSB seats](#).
- **USDA/AMS/NOP Update:** NOP Standards Director Erin Healy provided an overview of the NOP’s recent release of their [Online Retail Toolkit](#), a consumer-focused suite of educational materials aimed at helping consumers understand what the organic label means and how USDA protects it. Dr. Tucker gave a presentation on program updates and then opened the floor for questions from NOSB members. A pre-recorded NOP update was made available in advance of the meeting and is available via NOP’s Organic Integrity Learning Center.
⇒ [Direct link to the pre-recorded presentation](#)

Highlights of the in-person presentation are included below and largely focused on the status of the Strengthening Organic Enforcement rule, fully implemented just a few weeks prior to the meeting on March 19. OTA is tracking closely the following rules/topics and will continue to provide updates to OTA members:

- **Strengthening Organic Enforcement (SOE):** Dr. Tucker highlighted some of what the NOP has learned in the initial implementation period.
 - With SOE now requiring electronic import certificates on all incoming organic product, 5,322 import certificates have been issued as of April 24. To provide an example of the transparency provided in implementing this requirement, the program discovered a number of organic labeled wines entering the country with added sulfites. While allowed in wines with a “made with” claim, the addition of sulfites is not allowed under USDA organic regulations. Direct follow up with exporters and importers of these wines with clarification of the requirements, as well as additional certification oversight, will prevent further imports and protect the integrity of the U.S. market.
 - Customs brokers were also found to be an important step in the verification process of imported product, with some brokers denying

entry to organic labeled products in the absence of valid certification documentation.

- While the program has identified some technical challenges as the industry adjusts to SOE, most indications point to initial success.
 - Dr. Tucker outlined next steps in SOE implementation will include continued rapid follow up with import issues, the review of certifiers' control updates, enforcement action with noncompliant certifiers, and taking enforcement action where needed in the supply chain.
 - Dr. Tucker's report was followed by a robust Q&A session with Board members with Tucker encouraging the Board and community to exercise optimism and faith, and to give SOE a chance to protect us as we see its impact unfold.
- **Transition to Organic Partnership Program (TOPP) Presentations:** Regional leads and project partners from the 11-state Midwest region shared updates and successes from across the area. TOPP continues to see impact with 63 matched mentorship pairs, 44 events, and a number of resources produced. 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, 13 members were in attendance.



Current NOSB members Top (L to R): Brian Caldwell, Franklin Quarcoo, Dilip Nandwani, Gerald D'Amore, Kyla Smith (Chair), Nathan Powell-Palm, Kimberly Huseman, Nathaniel Lewis (Secretary)

Bottom (L to R): Wood Turner, Allison Johnson, Carolyn Dimitri, Logan Petrey, Amy Bruch (Vice Chair), Mindee Jeffrey

MEETING OUTCOMES

PROPOSALS: 7 proposals were considered by NOSB, of which 2 passed and one was 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.

- **Technical Review (TR) Template Update (MATERIALS) Passed (14 yes, 0 no, 1 absent)** – proposal recommends updates to the (TR) templates to better align with the petition process and OFPA criteria and to directly address excluded methods.
- **Policy and Procedure Manual (PPM) Revisions (POLICY DEVELOPMENT) Passed (14 yes, 0 no, 1 absent)** – proposal recommends updates to clarify duties and roles of the Board, expectations regarding participation in Board proceedings, and clarification that all Board members function as equals regardless of classification of the seat, e.g. Special Government Employee.
- **Carbon Dioxide (CROPS) Motion to return to Subcommittee (13 yes, 1 abstain, 1 absent)** – petitioned for use as a plant or soil amendment, though the Board noted there was a lack of information in the petition about the importance or need for the substance as a crop or soil amendment. Discussion at the meeting indicated a need for further input from all sectors of production to better understand its use and necessity.
- **Opportunities in Organic – Improving Support for Organic Transition (COMPLIANCE, ACCREDITATION, AND CERTIFICATION) Passed (14 yes, 0 no, 1 absent)** – proposal drawing on stakeholder experiences with organic transition programs and USDA’s Organic Transition Initiative to maximize the benefits of public investments in organic transition and ensure that organic is relevant to a more diverse population – as an environmental stewardship strategy, a career path, and a source of sustenance.
- **Magnesium Carbonate, Magnesium Carbonate hydroxide (HANDLING) Failed (0 Yes 14 No, 1 absent)** – both materials were petitioned for use as a drying agent or anti-caking agent, specifically for use in organic chicory production to prevent the powder from sticking to the walls of production equipment. The Board noted there was very little public comment received and alternatives exist on the National List. Separate votes were taken on each substance, with the Board opting not to add either substance to the National List.
- **Rye Pollen Extracts (HANDLING) Failed (0 Yes 14 No, 1 absent)** – petitioned for use as a vegan sweetener syrup to replace honey from bees. The Board noted that because the petitioner has the option of obtaining rye pollen extract by using nonorganic rye seed to produce an organic crop, and therefore an organic rye pollen, the addition of this substance to the National List is unnecessary.

DISCUSSION DOCUMENTS: NOSB considered 6 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.

- **Research Priorities 2024 (MATERIALS)** – considers the annual ranking of research priorities and requests public input. The Board seeks ways hear more regularly from the research community to better understand the status of various topic areas, as well as ways to hear from the organic community on which topic areas are most pressing. The Board requested that the National Institute of Food and Agriculture (NIFA) provide an update at the fall meeting.
- **Inert Ingredients in Pesticide Products (MATERIALS)** – continues the Board’s ongoing consideration of the various options put forth for replacing the outdated reference to the EPA’s List 3 and List 4 categorical listings, which are no longer maintained by EPA. A vote on the option—or options—the Board believes most viable to move forward to rulemaking is expected at the fall meeting.
- **Compost Production for Organic Agriculture (CROPS)** – intended as a forum for the NOSB, NOP, and the stakeholder community to gain insight into the

current state of organic compost production, towards updating the regulations and addressing issues raised by a petition made directly to USDA from the Biodegradable Product Institute (BPI), which requests a change to the definition of compost and to add a definition of “compost feedstock” to the USDA organic regulations. The Board heard from an expert panel composed of compost producers, a USDA microbiologist, and a material review organization. The panel delved into the complex nature of waste collection, segregation, compost production and the potential inclusion of biodegradable synthetic materials in the production of compost intended for use in organic production.

- **Residue Testing for a Global Supply Chain (COMPLIANCE, ACCREDITATION, AND CERTIFICATION)** – continuation of a larger discussion on oversight to deter fraud in the supply chain, this considers updates to related foundational guidance and instruction documents with the goal of consistency in testing and responding to positive residues. The Board recognizes that while organic is a process-based system, testing plays a role as a deterrent to fraud and a monitoring and compliance tool. The Board’s next steps on this issue include proposing specific updates to guidance, considering other areas of testing such as detection of fraud in input materials, and the potential for oversight/accreditation of material review organizations.
- **Climate Induced Farming Risk and Crop Insurance (COMPLIANCE, ACCREDITATION, AND CERTIFICATION)** – continuation of a discussion on how to improve crop insurance available to organic producers, specifically looking at T-yields (the assigned yields when a producer doesn’t have production history) in organic production. The Board received good public feedback on how T-yields can be improved and will be looking to the fall to bring robust action items to make crop insurance coverage more equitable for organic producers.
- **Organic Food System Capacity and Constraints (COMPLIANCE, ACCREDITATION, AND CERTIFICATION)** – considers organic market factors, gaps in supply chain infrastructure, and market-related risk management tools as a means to ensure transitioning and existing producers have continued opportunities. The Board recognizes the interconnectedness with the other Subcommittee documents and encourages the community to further the conversation that it hopes leads to meaningful recommendations.

SUNSET REVIEWS: NOSB discussed the following materials on the National List that are currently under sunset review and scheduled to sunset in 2026.

- ⇒ **IMPORTANT:** The votes will take place at the Fall 2024 meeting. This means there is still time to weigh-in using [OTA's Sunset Surveys!!](#)
- ⇒ Please note the **red text below** and the information NOSB is specifically asking for.

MATERIAL (SUBCOMMITTEE)	QUESTIONS	DISCUSSION/REQUESTS
Atropine	None	General support.
Hydrogen peroxide (LIVESTOCK)	None	General support.
Iodine (LIVESTOCK)	<ol style="list-style-type: none"> 1. Based on the feedback received at previous reviews of iodine and the recently conducted limited scope TR of iodine, it appears that there is a significant supply of NPE-free iodine formulas for numerous types of iodine products, and a prohibition on NPE containing formulas would not have significant impact on the industry. Is this analysis correct? Are there specific types of iodine products where NPE-free formulas are not available? 2. For certifiers and MROs: Would an annotation restricting iodine formulas to those that are free of NPEs pose significant challenges to the review of iodine products in organic system plans? 3. What specific language should NOSB consider for a proposed annotation in order to fully restrict NPEs from iodine products used on organic livestock operations? 	General support. Board considering annotation outside of sunset process to limit iodine sources to those without nonylphenol ethoxylates (NPE), or to potentially use the broader term alkyl phenol ethoxylates.
Magnesium sulfate (LIVESTOCK)	<ol style="list-style-type: none"> 1. Are there effective non-synthetic alternatives to magnesium sulfate for this purpose? 	General support.
Fenbendazole (LIVESTOCK)	<ol style="list-style-type: none"> 1. How do certifiers mitigate consistent repeat use of parasiticides? 2. Are there suggestions to improve the annotation? 3. Which age/class of animal do certifiers see their clients requesting approval for emergency parasiticide use? 4. How often do certifiers request copies of fecal sample test results to confirm the parasite load in a herd prior to allowing an emergency treatment with parasiticides? 	General support, with Board noted use contributes to animal welfare.
Moxidectin (LIVESTOCK)	<ol style="list-style-type: none"> 1. How do certifiers mitigate consistent repeat use of parasiticides? 2. Are there suggestions to improve the annotation? 3. Which age/class of animal do certifiers see their clients requesting approval for emergency parasiticide use? 4. How often do certifiers request copies of fecal sample test results to confirm the parasite load in a herd prior to allowing an emergency treatment with parasiticides? 	As with fenbendazole, general support, with Board noting use contributes to animal welfare. Board noted the NOSB technical specialist is conducting a comprehensive review of parasiticides
Peracetic acid/Peroxyacetic acid (LIVESTOCK)	None.	General support. Board acknowledged need to have a suite of sanitizing materials available.

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Xylazine, Tolazoline (LIVESTOCK)	None.	General support. Board noted that these materials mean a lot to the organic livestock community and are used in such small amounts, with little environmental and human health impacts.
Oxalic acid dihydrate (LIVESTOCK)	1. What factors are weighed when determining to use sucrose octanoate esters, formic acid, or oxalic acid dihydrate for varroa mite control?	General support. Board acknowledged need for apiculture standards and program noted it is on the long-term list of rulemaking opportunities. Board also noted apiculture substances remain important as organic honey is produced, even in the absence of standards specific to its production.
DL-methionine (LIVESTOCK)	1. Given supply disruptions of soybeans and soy products experienced by the organic livestock sector since February 2022, what organic crops other than soy could be incorporated into poultry rations to supply methionine? 2. Is there a need for changes to the USDA organic regulations to align with either Canadian (unrestricted amino acid are allowed in organic feed) and/or EU (non-organic feeds containing methionine are allowed) organic regulations? If so, what changes to the USDA organic regulatory text should be made? 3. What other nutritional barriers to organic poultry production do producers face when formulating well balanced rations for all poultry in the organic sector? 4. Is the current restriction on methionine in organic poultry diets necessary? What would the impact be on poultry nutrition and feed formulations if methionine was allowed without any restrictions?	General support from Board and community for the continued listing. However, discussion questioned the need for an arbitrary annotation limiting use. The Board also discussed the potential for other agronomic crops to fill the need for this, while at the same time offering market opportunity to domestic producers.
Trace minerals (LIVESTOCK)	1. Are there effective non-synthetic alternatives to some or all synthetic trace mineral feed supplements?	General support for both trace minerals and vitamins. Board noted trace minerals providing a balanced feed ration for animals while also giving manure a better balance of micronutrients from a crop fertility perspective. A technical review is expected before the fall meeting.
Vitamins (LIVESTOCK)	1. What are common uses of vitamin B and K feed supplements? Are they necessary for good ruminant health? 2. How common are livestock vitamin products that are produced with excluded methods? 3. Are there methods to detect livestock vitamin products produced using excluded methods?	See above notes.
Hydrogen peroxide (CROPS)	1. Is hydrogen peroxide an alternative to other more problematic sanitizers? 2. How essential is hydrogen peroxide in the rotation of sanitizers and is it specifically used in one part of organic production or more broadly? 3. Do certifiers allow it to be used in direct contact with products?	General support with Board noting this is a safe and useful sanitizer.
Soaps, ammonium (CROPS)	1. Is there still a need for ammonium soaps, considering the many alternatives for large animal deterrents?	General support with Board noting support in combination with other repellants or methods.

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Oils, horticultural (CROPS) As insecticides (including acaricides or mite control)	1. Are plant or fish oils in use that can take the place of mineral oils in organic insect or mite management programs?	Very strong support with Board noting the need for greater research in plant-derived alternatives.
Oils, horticultural (CROPS) As plant disease control.	1. Are plant or fish oils in use that can take the place of mineral oils in organic disease management programs?	See above notes.
Pheromones (CROPS)	1. Is there an interest in knowing more about the inert ingredients that are used in formulating pheromone products? 2. How much information would be considered acceptable given proprietary information rights of pesticide manufacturers.	General support with few environmental or health issues.
Ferric phosphate (CROPS)	1. Is there new information about the effects of EDTA or other chelating agents on the toxicity of ferric phosphate to non-target organisms, including earthworms and dogs? 2. Are their ferric phosphate products that don't include chelating agents? 3. Do sulfur-based slug management products provide an effective alternative to ferric phosphate? Do they also include chelating agents? 4. When used in ferric phosphate products, does EDTA chelate heavy metals in soils? Are there studies that show the combination of ferric phosphate + EDTA (chelator) cause toxic effects in soil microorganisms, including earthworms, or plants? 5. Are ferric phosphate products widely used by organic farmers to control slugs and snails? 6. Are sulfur-based slug and snail products effective and can they be used in place of ferric phosphate products?	General support but Board noted the synergistic effects of the active, ferric phosphate, and the chelating agent, EDTA, increases toxicity to earthworms by a factor of 100. With the manufacturer claiming the substance is effective without the chelating agent, the Board questioned whether an annotation could be considered to disallow the chelating agent. A Technical Review is pending.
Potassium bicarbonate (CROPS)	1. Have you used any of the many alternative materials to potassium bicarbonate on your farm, and did they provide the desired results for disease control? 2. Is potassium bicarbonate still needed in your organic farming operations? If so, why?	Strong support for relisting. Board noted this is a safe substance when used at recommended concentrations.
Magnesium sulfate (CROPS)		General support with Board noting that while dolomite is a nonsynthetic alternative, use of it will raise soil pH.
Hydrogen chloride (CROPS)	1. Are there any recent advances in alternative practices or methods for delinting cotton or planting cotton seed that hasn't been delinted?	General support. Board noted original petitioner said the listing may no longer be needed given this can be used on non-organic seed and still planted on organic ground. However, the listing would be critical if organic seed were available as use of this as a de-linting substance would require listing to preserve its organic status.
Ash from manure burning (CROPS)	None	None.
Sodium fluoaluminate (mined) (CROPS)	1. Is there any new research or relevant information in the marketplace that should be considered in conjunction with OFPA criteria and the long-standing prohibition on using sodium fluoaluminate in organic production?	None.

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Acids (Citric and Lactic) (HANDLING)	1. There are now numerous suppliers of certified organic citric acid. Should NOSB consider recommending the addition of an annotation to citric acid requiring processors to use an organic version of citric acid when commercially available?	General support. Board noted the idea of applying commercial availability to 205.605 substances, however acknowledged need to be cautious not to make things complex with an annotation. Some concern for use of excluded methods in production of certain forms of bacteria used to produce these acids. However, it appears these processes are in the experimentation phase and not currently in use.
Calcium citrate (HANDLING)	1. Is there any information we should consider regarding the sunset of this substance?	General support for all 3 citrates.
Potassium citrate (HANDLING)	1. Is there any information we should consider regarding the sunset of this substance?	See above notes.
Sodium citrate (HANDLING)	1. Is there any information we should consider regarding the sunset of this substance?	See above notes.
Enzymes (HANDLING)	1. For manufacturers: describe how you ensure no excluded methods are used when including enzymes into your organic formulation. 2. For certifiers: describe how you ensure organic processors' compliance with the prohibition on excluded methods in organic products when enzymes are used in the formulation. 3. Are there ancillary substances that should be prohibited for use, due to concerns about excluded methods?	Wide support for continued listing of enzymes, microorganisms, and yeast. Board noted numerous Technical Reviews covering all of these substances. Further discussion noted common best practices used by certifiers to evaluate excluded methods in these substances and how to screen them out.
Microorganisms (HANDLING)	1. For manufacturers: describe how you ensure no excluded methods are used when including microorganisms in your organic formulation. 2. For certifiers: describe how you ensure organic processors' compliance with the prohibition on excluded methods in organic products when microorganisms are used in the formulation. 3. Are there any ancillary substances that should be prohibited due to the potential for excluded methods?	See above notes.
Yeast (HANDLING)	1. For manufacturers: describe how you ensure no excluded methods are used when including yeast into your organic formulation. 2. For certifiers: describe how you ensure organic processors' compliance with the prohibition on excluded methods in organic products when yeast is used in the formulation. 3. Are there ancillary substances that should be prohibited for use, due to concerns about excluded methods?	See above notes.
Hydrogen peroxide (HANDLING)	1. Is hydrogen peroxide an alternative to other more problematic sanitizers? 2. Do certifiers allow it to be used in direct contact with products?	Wide support for continued listing of hydrogen peroxide and peracetic acid/peroxyacetic acid. Board acknowledged the interest by some in the community for a wider look at sanitizer use and that the NOSB technical specialist may be a resource for such a review. However, some expressed hesitation on the utility of such a review when there is wide acknowledgement that a broad scope of sanitizer substances is essential to organic production.

MATERIAL (SUBCOMMITTEE)	QUESTIONS	DISCUSSION/REQUESTS
Peracetic acid/Peroxyacetic acid (HANDLING)	None.	See above notes.
Celery powder (HANDLING)	<ol style="list-style-type: none"> 1. Is there stakeholder concern about ongoing non-specified ancillary substances used in this material? 2. Is organic supply commercially available for this material? What are the barriers to organic production? 3. Is the organic version of the same caliber as the nonorganic? 	General support for continued listing with Board noting appreciation that research continues with some progress at identifying barriers to reaching adequate supply of organic celery powder. Board noted complexity of the issue but the positive aspect that this aids in providing a continued market for organic meat production.
Calcium chloride (HANDLING)	<ol style="list-style-type: none"> 1. Is the calcium chloride that is commercially used/available produced using non-synthetic processes? 2. CERTIFIERS: What kinds of supporting documentation is obtained to verify the manufacturing process of calcium chloride is non-synthetic? 	General support with a limited scope Technical Review focusing on manufacturing process expected to be published soon.
L-Malic acid (HANDLING)	<ol style="list-style-type: none"> 1. Do any organic products contain nonsynthetic forms of L-malic acid? 2. Do stakeholders think L-malic acid should be reclassified as a synthetic substance and added to §205.605(b)? 3. If L-malic acid is added to §205.605(b), should its nonsynthetic listing be removed from §205.605(a)? 	General support with Board discussion centering on the classification of this substance and whether it is more appropriate listed as a synthetic. Discussion pointed to need for greater deliberation on classification of fermentation products to ensure consistent classification decisions.
Magnesium sulfate (HANDLING)	<ol style="list-style-type: none"> 1. What organic products currently include magnesium sulfate? 2. Are there adequate alternatives to magnesium sulfate? 	General support.
Perlite (HANDLING)	<ol style="list-style-type: none"> 1. Have there been any advancements in food processing that would eliminate the need of perlite on the National List? 	General support.
Potassium iodide (HANDLING)	none	General support.
Pullulan (HANDLING)	<ol style="list-style-type: none"> 1. Does pullulan have the potential to be produced organically, and if so, would a commercial availability requirement help drive commercialization of organic pullulan? 	General support. One stakeholder comment noted organic pullulan is now available, however scale of production is not quite there to meet demand.
Activated charcoal (HANDLING)	<ol style="list-style-type: none"> 1. Are there any industry changes that would challenge the current listing for activated charcoal? 	General support.
Ascorbic acid (HANDLING)	<ol style="list-style-type: none"> 1. Do stakeholders have any experience with natural or organic alternatives to ascorbic acid for some or all of its uses in organic handling? 	General support.
Collagen gel (HANDLING)	<ol style="list-style-type: none"> 1. Is there a method of production for nonsynthetic collagen gel? 2. Are organic livestock by-products commercially available for organic collagen gel production? 3. Have advancements been made with testing the viability of marine sourced collagen gel? 	General support with Board noting interest in marine (fish) sources of collagen. Board noted interest in additional data on how to increase organic sources, which will require preservation of body parts as organic through the processing supply chain.
Ferrous sulfate (HANDLING)	<ol style="list-style-type: none"> 1. Should the individual listing for ferrous sulfate be removed from the National List, with continued use of ferrous sulfate allowed under the nutrient vitamins and minerals listing, to eliminate redundancy? 	General support and covered under same discussion as Nutrient vitamins and minerals, below.
Nutrient vitamins and minerals (HANDLING)	<ol style="list-style-type: none"> 1. Are you aware of nutrient vitamins and minerals being used in organic products in ways that do not conform to 21 CFR 104.20? 	General support for continued listing as most are fortifications required by other regulations, with exception of DHA. However, Board noted interest in revisiting a previous recommendation

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	2. Are there any remaining issues with fortification of infant formula that have not been resolved? 3. Do certifiers find the current annotation enforceable? Are there any particular substances in this category that are being allowed or prohibited inconsistently? 4. Are certifiers reviewing ancillary substances for nutrient vitamins and minerals in accordance with the Spring 2016 NOSB recommendation? Are they imposing limits on ancillary substances that may be present? 5. Are there any specific substances included in this categorical listing that pose health or environmental concerns requiring closer review?	proposing an annotation limiting fortification to required nutrients. Board is interested in gathering background on this previous discussion, value in bringing a similar recommendation forward, and any comments from organic operations with a stake in this area.
Potassium phosphate (HANDLING)	1. Are there any new studies supporting the link between potassium phosphate and health issues? 2. Are there any new alternatives?	General support.
Sodium acid pyrophosphate (HANDLING)	1. Are there any new health studies regarding phosphorous consumption? 2. Are there any new alternatives to this material?	General support.
Tocopherols (HANDLING)	1. Are organic tocopherols commercially available? 2. Is there an adequate and suitable supply of non-synthetic tocopherols to meet commercial needs?	General support with Board discussion noting potential for reclassifying as nonsynthetic. Board could initiate annotation change or wait for a petition to reclassify.
Fish oil (HANDLING)	1. Are there any environmental concerns to be considered?	General support with Board discussion acknowledging previous NOSB recommendation to amend annotation to restrict to fish byproducts and to fishing practices that meet third party sustainability standards. The NOP did not move forward with this recommendation.
Gelatin (HANDLING)	1. Is there sufficient commercially available organic gelatin? 2. What gaps persist that necessitate gelatin to be on the national list?	General support.
Orange pulp, dried (HANDLING)	1. Is there a sufficient and suitable supply of organic orange pulp, dried? If not, how can we overcome the barriers that limit organic production of orange pulp, dried? 2. Are there organic products that would not be able to be produced if orange pulp, dried was removed from the National List?	General support, though not widely used. Board noted there was no response to question regarding supply quantity, though some comments pointing out the processing and drying facilities are not located close enough to juicing facilities to meet quality requirements.
Seaweed, Pacific kombu (HANDLING)	1. Is organic Pacific kombu commercially available? If not, what barriers remain?	General support. Board expressed interest in reviewing previous work by a past Board member on sustainability concerns.
Wakame seaweed (HANDLING)	1. Is organic wakame commercially available? If not, what barriers remain?	See above notes.

OTHER TOPICS AND CLOSING REMARKS

The Board closed the meeting with a discussion revisiting some of the themes of the Compliance, Accreditation, and Certification Subcommittee discussion documents and how to grow the organic market in ways that return a sustainable profit to producers while also remaining accessible to consumers.

In-person public comments appear to be returning, at least through the fall meeting after which the Board will evaluate whether to move forward with in-person comments as a regular feature.

LOOKING FORWARD

The [Fall 2024 NOSB Meeting](#) is scheduled for October 22-24 in Portland, OR. The public comment webinars are scheduled for October 15 and October 17 from Noon – 5:00 pm Eastern. The NOSB Work Agenda can be found on the [NOSB's website](#) and will be updated to reflect the Board's work for the Spring meeting.

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.