Recap of Public Comments Submitted to the

National Organic Standards Board

Fall 2015 Meeting

October 26-29 Stowe, Vermont

Compiled by the staff of The Cornucopia Institute

CORNUCOPIA

INSTITUTE

HANDLING SUBCOMMITTEE PROPOSALS

HANDLING SUBCOMMITTEE 2017 SUNSET MATERIALS - §205.605(a)

2017 SUNSET MATERIALS - §205.605(b)

2017 SUNSET MATERIALS - §205.606

CROPS SUBCOMMITTEE PROPOSALS

2017 SUNSET MATERIALS - §205.601

How to Use This Document

For the benefit of National Organic Standards Board members, and other organic stakeholders, The Cornucopia Institute has endeavored to compile, as accurately and objectively as possible, a recap of all formal written comments pursuant to the **Fall 2015 NOSB meeting.**

Cornucopia greatly appreciates the work, dedication and enormous time commitment required to serve on the NOSB. Our hope is to provide a valuable resource for the Board better enabling members to understand the scope and sentiment of organic industry participants, including:

- Citizens
- Farmers
- Public Interest Groups
- Food Processors/Handlers
- Manufacturers/Ingredient Suppliers
- Distributors/Retailers
- Trade Associations/Industry Consultants
- Organic Certifiers/Materials Review Organizations

This document is organized by NOSB Subcommittee, in alphabetical order (please note there is a table of contents at the beginning of the document, as well as an index at the end). Under each agenda item, a table shows the number of comments submitted and the various stakeholder positions on that item. The "Notes" section under each table provides additional explanation.

Thank you for your work on behalf of all organic stakeholders. Please feel free to contact us regarding any of our findings or our methodology.

Will Fantle
Research Director
The Cornucopia Institute

***IMPORTANT NOTE**:*
Cornucopia has not finished our review of 2017 materials because of the tremendous volume of sunsetting materials. That might be true of other public interest groups as well. As a result, it is likely that before the next meeting, hopefully prior to additional debate on the subcommittee level, Cornucopia and others will be submitting additional comments. Unlike 2016 Sunset materials, you will note that some 2017 issues enjoy less public participation. NOSB members are encouraged to contact Cornucopia's technical staff for additional information.

ABBREVIATION & ACRONYM KEY

ACA	Accredited Certifiers Association
ADS	Association for Dressings and Sauces
AK	Amy's Kitchen
AOD	Aurora Organic Dairy
BFC	Botanical Food Company PTY. Ltd
BP	Beyond Pesticides
CCFF	California Custom Fruits and Flavors
CCOF	California Certified Organic Farmers
CFS	Center for Food Safety
CNF	Coleman Natural Foods
CR	Consumers Report
CROPP	CROPP Cooperative
DSM	DSM Nutritional Products
FPCC	Ferrara Pan Candy Company Inc.
FV	Fetzer Vineyards (dba Bonterra Vineyards)
FEMA	Flavor and Extract Manufacturers Association
FWW	Food and Water Watch
GM	General Mills
GNT	GNT USA, Inc.
GO	Global Organics
HCG	Hain Celestial Group
IACM	International Association of Color Manufacturers
IFAC	International Food Additive Council
IOIA	International Organic Inspectors Association
IOS	Independent Organic Services, Inc.
JPA	Juice Products Association
LVC	Lander Vet Clinic
MOI	Marroquin Organic International
MOSA	Midwest Organic Services Association
NHC	Northwest Horticultural Council
NOC	National Organic Coalition
NSC	North Star Cooperative, Inc.
OMRI	Organic Materials Review Institute
OPWC	Organic Produce Wholesalers Coalition
OTA	Organic Trade Association
OTCO	Oregon Tilth
PCC	PCC Natural Markets
PCO	Pennsylvania Certified Organic
PF	Perdue Food
QAI	Quality Assurance International
SNF	Smucker Natural Foods
StF	Stonyfield
TradMed	Traditional Medicinals, Inc.
VOF	Vermont Organic Farmers
VSC	Vermont Soap Company
WDA	Wolf, DiMatteo + Associates
WODPA	Western Organic Dairy Producers Alliance
WSDA	Washington State Department of Agriculture
WWF	White Wave Foods
WYC	Wallaby Yogurt Company

HANDLING PROPOSALS

Alginic Acid

Stabilizer and defoaming agent

Proposal: The Handling Subcommittee proposes reclassification of Alginic Acid from §205.605(a) to §205.605(b) of the National List.

Vote in Subcommittee:
Motion to reclassify Alginic Acid from 205.605(a) to 205.605(b) of the National List
Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

	Support Reclassification	Oppose Reclassification	Neutral/ Seeks Clarification
Farmers / Citizens	1		
Public Interest Groups	BP[a]		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IFAC		OTA[b], OMRI[c]
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "The use of a synthetic material to improve textures in soups and soup mixes is a purpose that is not essential to the production of food. Furthermore, the TR lists many natural and organic substitutes. The NOSB should classify alginic acid as synthetic and remove it from the National List."

b. Organic Trade Association (OTA) states: "We agree that alginic acid should be classified as 'synthetic'… As a side note of caution, however, we're uncertain about the urgency to reclassify these materials at this time, and would like to point out the risk of making such a determination based on **draft** NOP guidance."

c. Organic Materials Review Institute (OMRI) States: "In conjunction with this reclassification decision, the NOSB should also consider how other similar substances on the National List might be affected. It may be favorable to postpone non-urgent reclassification decisions until the final version of the Classification of Materials Guidance is published to ensure consistency of all new classification decisions."

Carnauba Wax

Coating for fruits, vegetables as well as candies, and a base for chewing gum

Proposal: The Handling Subcommittee proposes reclassification of Carnauba Wax from §205.605(a) to §205.606 of the National List.

Vote in Subcommittee:
Motion to classify Carnauba Wax as agricultural and move its listing to section §205.606
Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

	Support Reclassification	Oppose Reclassification	Neutral/ Seeks Clarification
Farmers / Citizens			1
Public Interest Groups			BP_a, CR_b
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			OTA_c, $OMRI_d$
Certifiers			$MOSA_e$,

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the reclassification of carnauba wax as agricultural. We support the listing of carnauba wax on §205.606 if an annotation is added to prevent contamination with undesirable synthetic materials."

b. Consumer Reports (CR) states: "These ingredients do not appear to be essential to organic handling and should not be added to the National List."

c. Organic Trade Association (OTA) states: "We agree that… Carnauba Wax should be classified as 'agricultural.' As a side note of caution, however, we're uncertain about the urgency to reclassify these materials at this time, and would like to point out the risk of making such a determination based on **draft** NOP guidance."

d. Organic Materials Review Institute (OMRI) States: "In conjunction with this reclassification decision, the NOSB should also consider how other similar substances on the National List might be affected. For example, wood rosin (resin) is also an exudate from trees. It may be favorable to postpone non-urgent reclassification decisions until the final version of the Classification of Materials Guidance is published to ensure consistency of all new classification decisions."

e. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "That avocado may not be 100% organic. This can create some confusion at the retail level when used on produce. Shelf displays may not enable consumers to know what's waxed and what isn't. Non-retail cases also may not declare use of waxes."

Sodium Lactate and Potassium Lactate – Petitioned

Antimicrobials for use in Ready-to-Eat meat and poultry products

Petition: To add Sodium Lactate and Potassium Lactate to the National List under §205.605(b). This request was made to the NOSB to take under consideration by the NOP, in a memorandum dated June 25, 2014. The original joint petition was submitted on January 5, 2004.

Subcommittee Action & Vote:

Classification Motion:
Motion to classify both Sodium Lactate and Potassium Lactate as synthetic
Yes: 7 No: 0 Absent: 0 Abstain: 0 Recuse: 0
Listing Motion:
Motion to list Sodium Lactate and Potassium Lactate on §205.605(b) with the following annotation: for use as an antimicrobial agent only
Yes: 4 No: 1 Abstain: 2 Absent: 0 Recuse: 0

	Support Petition	Oppose Petition	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	Cornucopia[a]	BP[b] CR[d] FWW[e] NOC	
Food Processors / Handlers	BFC		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	CROPP[f], OMRI[c]	NOC[g]	OTA[h]
Certifiers	CCOF[i]		QAI[j]

Notes:

a. The Cornucopia Institute states: "These compounds are used specifically for flavor enhancement and the preservation of meat[1], which is prohibited under §205.600(b)(4) –preservative, color and flavor enhancement, and creation of texture. If they were to be listed under §205.605(b), then their use should be in compliance with §205.600(b)(4) and restricted to the petitioned use as pathogens inhibitors by annotation."
b. Beyond Pesticides (BP) states: "Potassium lactate and sodium lactate are synthetic chemicals used for purposes not allowed in organic processing. Therefore, they should not be added to the National List."
c. Organic Materials Review Institute (OMRI) States: "OMRI supports individual listings of these substances on the National List to be consistent with common practice and with other acid salts that are allowed and have their own listings. NOSB should also confirm whether ancillary substances, such as sodium diacetate, are prohibited. "
d. Consumer Reports (CR) states: "We have searched for organic products containing these ingredients, including products from Applegate Farms which was the original petitioner, and have been unable to locate any organic deli meats containing sodium lactate or potassium lactate. These ingredients do not appear to be essential to organic handling and should not be added to the National List."
e. Food & Water Watch (FWW) states: "We believe that sodium lactate and potassium lactate are synthetic preservatives, are not appropriate for use in organic food and should not be listed on the National List."
f. CROPP Cooperative (CROPP) states: "We do not currently use Sodium Lactate in our products but may want to in the future. As mentioned in the proposal, it is an ingredient to help control pathogens such as

[1] 2015 TR – Lactic acid and lactates. Page 15, lines 720-732

L. Monocytogenes and other spoilage organisms. We fully support the addition sodium lactate and potassium lactate to the National List as annotated in the Handling Subcommittee proposal."

g. National Organic Coalition (NOC) states: "Potassium lactate and sodium lactate are synthetic chemicals used for purposes not allowed in organic processing. Therefore, they should not be added to the National List."
h. Organic Trade Association (OTA) states: "OTA does not have a conclusive position on whether these two substances should be allowed in organic processing. We do agree, however, that they should be taken through the required petition process as is now being done."
i. California Certified Organic Farmers (CCOF) states:" CCOF supports the proposal to add sodium lactate and potassium lactate to the National List at 205.605(b) for use as an antimicrobial agent only."
j. Quality Assurance International (QAI) states: "Sodium lactate is currently being used by five QAI certified operations in accordance with the NOP letter granting approval of this material… Zero QAI clients are using potassium lactate."

Flavors, Non-synthetic

Flavoring ingredients in organic foods

Proposed Annotation Change: Flavors are currently listed on §205.605(a) of the National List as an allowed non-synthetic under the following listing*: "Flavors, non-synthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative."* The NOSB Handling Subcommittee is recommending the listing to be revised to read as: *"Flavors – Non-synthetic flavors may be used when organic flavors are not commercially available. All flavors must be derived from organic or non-synthetic sources only, and must not be produced using synthetic solvents and carrier systems or any artificial preservative."*

Subcommittee Action & Vote:
Proposed Annotation Motion to revise the Flavors annotation to read: "*Non-synthetic flavors may be used when organic flavors are not commercially available. All flavors must be derived from organic or non-synthetic sources only, and must not be produced using synthetic solvents and carrier systems or any artificial preservative."*
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Change	**Oppose Change**	**Neutral/ Seeks Clarification**
Farmers / Citizens	2		1
Public Interest Groups	BP_a		
Food Processors / Handlers	WWF, $TradMed_b$ GM, SNF		
Ingredient Suppliers / Material Manufacturers	HCG		
Wholesalers/Distributors / Retailers	StF_c		
Trade Associations / Industry Consultants	NOC_d, $FEMA_e$		OTA
Certifiers	$CCOF_f$		$MOSA_g$, QAI_h

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the proposal to annotate flavors. We also support the plan outlined by the Handling Subcommittee (HS) and urge its adoption as a recommendation by the NOSB by adding an expiration date to the listing."
b. Traditional Medicinals (TradMed) states: "To the extent that the NOSB wishes the least disruption to industry, TradMed understands the sub-committee's recommendation to focus on commercial availability in determining whether to use a flavor. While TradMed believes the NOSB could take a stronger approach, to the extent that the NOSB decides to adopt the subcommittee's proposal, TradMed believes that any commercial availability decision for flavors should be limited to five (5) years- at which point an accrediting or certification agency should no longer certify a product as organic containing a non-organic flavor."
c. Stonyfield (StF) states: "Stonyfield supports the Handling Subcommittee's proposal to relist natural flavors on §205.605(a) with an annotation change to reflect that natural flavors should only be used when organic flavors are not commercially available. This is an important first step to encourage broader use of organic flavors in organic products and, over time, we hope this will lead to expanded availability of high-quality organic flavors on the market."
d. National Organic Coalition (NOC) states: "We urge the NOSB to keep on the track to wholly organic flavors laid out by the NOSB in 1995, moving a little more quickly."
e. Flavor and Extract Manufacturers Association (FEMA) States: "FEMA (…) generally supports the NOSB Handling Subcommittee's recommended annotation change for flavors on §205.605(a)."

f. California Certified Organic Farmers (CCOF) states: "CCOF supports requiring organic commercial availability verification for all materials on §205.605, including flavors. The proposed annotation change would ensure that manufacturers and processors search for organic starting materials. CCOF also supports requiring commercial availability verification for 'organic' as well as 'made with organic' products because it will help increase the availability of organic flavors in the marketplace."
g. Midwest Organic Services Association (MOSA) states: "We support efforts to require organic preference (commercial availability requirement) for natural flavors, but we have concerns about the method and consistency of enforcement. We request that the National Organic Program provides clear guidance to accredited certifiers regarding how commercial availability criteria should be enforced in general, and with regard to flavors in particular if/as any rule change moves forward."
h. Quality Assurance International (QAI) states: "Changing the current annotation for flavors in §205.605 to request that organic flavor constituents are used prior to using non-organic flavor constituents may not be a sound and sensible approach for organic flavor manufacturers. We believe that none of these non-agricultural substances exist in organic form at this time. A requirement that commercial unavailability is demonstrated would, in our view, not add positive value to the current certification process, but a paper chase."

Ancillary Substances Permitted in Microorganisms and Dairy Cultures

Ancillary substances are intentionally added to a formulated generic handling substance on the National List. These substances do not have a technical or functional effect in the finished product, and are not considered part of the manufacturing process that has already been reviewed by the NOSB. While some of these substances are removed or consumed in their processing, many may remain in the final product in tiny amounts.

Proposal: Approve the functional classes of ancillary substances listed in the chart below for use with Microorganisms and Dairy Cultures.

Functional Class	**Substance Name**
Anti-caking & anti-stick agents	magnesium stearate, calcium silicate, silicon dioxide
Carriers and fillers, agricultural or non-synthetic	lactose, maltodextrins, sucrose, dextrose, potato starch, non-GMO soy oil, rice protein, grain (rice, wheat, corn, barley) flour, milk, autolyzed yeast, inulin, cornstarch, sucrose.
Carriers and fillers, synthetic	micro-crystalline cellulose, propylene glycol, stearic acid, dicalcium phosphate. potassium phosphate, potassium sulfate, tricalcium phosphate.
Preservatives	sodium benzoate, potassium sorbate, ascorbic acid, sodium formate
Stabilizers	maltodextrin
Cryoprotectants used to freeze-dry (& freeze) microorganisms and Dairy Cultures	liquid nitrogen, maltodextrin, magnesium sulfate, dimethyl sulfoxide, sodium aspartate, mannitol, sorbitol , polysorbate
Substrate that may remain in final product	milk, lactose, grain (rice, barley, wheat) flour, brewed black tea and sugar, soy

Discussion:
Many public commenters for the first posting were concerned about a process for amending the ancillary substances included in this review between sunset periods. The Handling Subcommittee believes that this captures all of the functional classes in use for microorganism and dairy cultures products. Additional ancillaries that fall within one of the functional classes above do not need to be reviewed further to be used. Any new functional class of ancillaries however will have to be petitioned.

Subcommittee Action & Vote:
Motion to approve the functional classes of ancillary substances in the chart above for use with Microorganisms and Dairy Cultures.
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Proposal	Oppose Proposal	Neutral/ Seeks Clarification
Farmers / Citizens		63	
Public Interest Groups		BP[c], NOC[d]	
Food Processors / Handlers			WWF
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers	StF[a]		
Trade Associations / Industry Consultants	IFAC		OTA
Certifiers	CCOF[b]		MOSA[e], OMRI[f]

Notes:

a. Stonyfield (StF) states: "The definition of ancillary substances should be a part of an affidavit that NOSB develops as a recommendation to the NOP. As the Organic Trade Association states in their comments, this affidavit should:
   1) define an 'ancillary substance' with reference to the NOP policy;
   2) provide examples according to the definition;
   3) request supporting documentation, such as the specification sheet;
   4) require a signature and date, and;
   5) include language that speaks to the legal ramifications of falsifying information to ACAs."

b. California Certified Organic Farmers (CCOF) states: "CCOF supports requiring organic commercial availability verification for all materials on §205.605, including flavors. The proposed annotation change would ensure that manufacturers and processors search for organic starting materials. CCOF also supports requiring commercial availability verification for 'organic' as well as 'made with organic' products because it will help increase the availability of organic flavors in the marketplace. CCOF urges NOSB to allow all ancillary substances currently listed in the proposals. CCOF does not support any additional National List annotation to limit the ancillary substances allowed in National List materials."

c. Beyond Pesticides (BP) states: "Beyond Pesticides opposes all three proposals on ancillary substances because they are inconsistent with OFPA and the process adopted by the NOSB for review of ancillary substances. (…) We believe that this experiment has been shown to result in inadequate control over chemicals added to organic foods, and we therefore recommend that the NOSB require that all ingredients allowed in organic foods –ancillary or otherwise– be either organic or listed on the National List. "

d. National Organic Coalition (NOC) states: "NOC opposes all three proposals on ancillary substances. They are inconsistent with OFPA and the process adopted by the NOSB in April 2013, and with which the NOP agreed. The process requires NOSB review of all ancillary substances according to OFPA criteria."

e. Midwest Organic Services Association (MOSA) states: "For all three ancillary substances proposals offered for this meeting, the NOSB review identified no ancillary substances or categories of ancillary substances that are of concern. Assuming that you've done your due diligence in identifying potential concerns, and found none, we wonder if our ongoing reviews of microorganisms, cultures, pectin, and yeast products are necessary. Is there a more sensible approach that honors the soundness of your petitioned substance or sunset review work? Can we avoid increasing the workload of certifiers?"

f. Organic Materials Review Institute (OMRI) States: "This proposal effectively reduces the depth of review of ancillary substance to the level of functional classes. As a result, the review of an ancillary substance will become dependent on the functional use that the substance exhibits within the non-organic ingredient or processing aid listed on §205.605-606. This approach can only be effective if the NOSB provides specific definitions of each functional class. Definitions for these terms should accompany the publication of these ancillary substance policies in NOP Guidance (e.g., forthcoming Permitted Substances Lists)."

Ancillary Substances Permitted in Pectin

Proposal: Approve the functional classes of ancillary substances listed in the chart below for use with Pectin products.

Functional Class	Substance Name
Stabilizer/standardizing agent	sugars (including dextrose)
Buffering agents	trisodium citrate and other salts

Discussion:
Ancillary substances for pectin consist only of sugars to standardize the amount of pectin in a product, and buffering salts to stabilize the product

Subcommittee Action & Vote:

Motion to approve the functional classes of ancillary substances in the chart above for use with Pectin

Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Proposal	Oppose Proposal	Neutral/ Seeks Clarification
Farmers / Citizens		63	
Public Interest Groups		BP[a], NOC[b]	
Food Processors / Handlers			WWF
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IFAC		OTA, IOIA[c]
Certifiers			MOSA[d], OMRI[e]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides opposes all three proposals on ancillary substances because they are inconsistent with OFPA, and the process adopted by the NOSB for review of ancillary substances. (…) We believe that this experiment has been shown to result in inadequate control over chemicals added to organic foods, and we therefore recommend that the NOSB require that all ingredients allowed in organic foods – ancillary or otherwise – be either organic or listed on the National List. "

b. National Organic Coalition (NOC) states: "NOC opposes all three proposals on ancillary substances. They are inconsistent with OFPA and the process adopted by the NOSB in April 2013 and with which the NOP agreed. The process requires NOSB review of all ancillary substances according to OFPA criteria."

c. International Organic Inspectors Association (IOIA) supports the recommendations by the Subcommittee regarding 'Ancillary Substances' for Pectin.

d. Midwest Organic Services Association (MOSA) states: "For all three ancillary substances proposals offered for this meeting, the NOSB review identified no ancillary substances or categories of ancillary substances that are of concern. Assuming that you've done your due diligence in identifying potential concerns, and found none, we wonder if our ongoing reviews of microorganisms, cultures, pectin, and yeast products are necessary. Is there a more sensible approach that honors the soundness of your petitioned substance or sunset review work? Can we avoid increasing the workload of certifiers?"

e. Organic Materials Review Institute (OMRI) States: "This proposal effectively reduces the depth of review of ancillary substance to the level of functional classes. As a result, the review of an ancillary substance will become dependent on the functional use that the substance exhibits within the non-organic ingredient or processing aid listed on §205.605-606. This approach can only be effective if the NOSB provides specific definitions of each functional class. Definitions for these terms should accompany the publication of these ancillary substance policies in NOP Guidance (e.g., forthcoming Permitted Substances Lists)."

Ancillary Substances Permitted in Yeast

Proposal: Approve the functional classes of ancillary substances listed in the chart below for use with Yeast.

Functional Class	Substance name
Antioxidants	butylated hydroxyanisole (BHA), butylated hydroxytoluene (BHT), propyl gallate (PG)
Preservatives	ascorbic acid
Emulsifiers	soybean oil, cottonseed oil, sorbitan monostearate, sorbitan tristearate, sorbitan monolaurate, sorbitan monooleate, sorbitan monpalmitate
Defoaming agents	Many, listed in TR (2014 TR, Table 5, Line 351)
Substrate that may remain in final product	food waste, microorganisms, molasses, starch

Discussion:
Ancillary substances for yeasts consist primarily of emulsifiers, antioxidants and defoaming agents. These compounds make a more uniform product that maintains its quality and form until used and prevents excess foaming during production.

Subcommittee Action & Vote:

Motion to approve the functional classes of ancillary substances in the chart above for use with Yeast

Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Proposal	Oppose Proposal	Neutral/ Seeks Clarification
Farmers / Citizens		63	
Public Interest Groups		BP[a], NOC[b]	
Food Processors / Handlers			WWF
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IFAC		OTA[c]
Certifiers			MOSA[d], OMRI[e]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides opposes all three proposals on ancillary substances because they are inconsistent with OFPA and the process adopted by the NOSB for review of ancillary substances. (…)We believe that this experiment has been shown to result in inadequate control over chemicals added to organic foods, and we therefore recommend that the NOSB require that all ingredients allowed in organic foods – ancillary or otherwise – be either organic or listed on the National List. "

b. National Organic Coalition (NOC) states: "NOC opposes all three proposals on ancillary substances. They are inconsistent with OFPA and the process adopted by the NOSB in April 2013, and with which the NOP agreed. The process requires NOSB review of all ancillary substances according to OFPA criteria."

c. Organic Trade Association (OTA) states: "…we continue to be concerned about the confusing nature of this topic and the potential for inconsistent implementation at the industry and certifier level."

d. Midwest Organic Services Association (MOSA) states: "For all three ancillary substances proposals offered for this meeting, the NOSB review identified no ancillary substances or categories of ancillary substances that are of concern. Assuming that you've done your due diligence in identifying potential concerns, and found none, we wonder if our ongoing reviews of microorganisms, cultures, pectin, and yeast products are necessary. Is there a more sensible approach that honors the soundness of your petitioned substance or sunset review work? Can we avoid increasing the workload of certifiers?"
e. Organic Materials Review Institute (OMRI) States: "This proposal effectively reduces the depth of review of ancillary substance to the level of functional classes. As a result, the review of an ancillary substance will become dependent on the functional use that the substance exhibits within the non-organic ingredient or processing aid listed on §205.605-606. This approach can only be effective if the NOSB provides specific definitions of each functional class. Definitions for these terms should accompany the publication of these ancillary substance policies in NOP Guidance (e.g., forthcoming Permitted Substances Lists)."

HANDLING 2017 SUNSET MATERIALS
§205.605(a) Non-synthetics Allowed

Alginic Acid

Stabilizer and defoaming agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens		BP[c]	
Public Interest Groups			
Food Processors / Handlers	WWF, AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IFAC[a] ADS IOIA[b]		
Certifiers			

Notes:

a. International Food Additive Council (IFAC) states: "Alginic acid is an important component of organic production and has unique functionality that makes it essential in many organic formulations. IFAC in not aware of an organic alternative to alginic acid, so fully supports the relisting of the substance."
b. International Organic Inspectors Association (IOIA) states: "We strongly support and thank you for the following recommendations from your committee…" regarding the "Reclassification of Alginic Acid to §205.605(b)."
c. Beyond Pesticides (BP) states: "Taking into account the lack of essentiality, reclassification, and environmental impacts, Beyond Pesticides supports the delisting of alginic acid."

Attapulgite

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Attapulgite from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Given the lack of interest attapulgite should be allowed to sunset." In spite of the Handling Subcommitee statement to the contrary: 'Public comment strongly supports continued listing of this material,' Beyond Pesticides found none.

Bentonite

Processing aid, filtering aid, and in organic body care products

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA, CCOF		OTA
Certifiers			

Calcium Carbonate

Buffering agent, calcium supplement

Petitioned/added: In 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA, ADS, IFAC		OTA
Certifiers			MOSA[a]

Notes:

a. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very common carrier in feed products."

Calcium Chloride

Firming agent, buffering agent

Petitioned/added: In 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP_b
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA $IACM_a$ ADS		OTA
Certifiers			

Notes:

a. International Association of Color Manufacturers (IACM) states: "Calcium chloride must remain on §205.605(a) because there is no organic substitute available. Should calcium chloride be removed from §205.605(a), the NOSB can expect severe market disruption, because it would make the production of organic caramel color impossible."
b. Beyond Pesticides (BP) states: "We consider the level of impurities - up to 6% - to be high for a food-grade material. The presence of calcium bromide is troublesome. We recommend that the NOSB send this back to the HS to investigate more closely."

Carnauba Wax

Used to coat fruit and vegetables, candies, and as a base for chewing gum

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Carnauba Wax from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP[a]		Cornucopia
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers	FPCC		
Trade Associations / Industry Consultants	OPWC[b]		IOIA[c], NHC[d]
Certifiers	CCOF		

Notes:

a. Beyond Pesticides (BP) states: "We support the listing of carnauba wax on §205.606 and relisting of wood rosin on §205.605(b) only if they are annotated with, "Not extracted using volatile synthetic solvents; contains only ancillary substances approved for organic production; presence must be labeled on individual items."
b. Organic Produce Wholesalers Coalition (OPWC) states: "…the Handling Subcommittee has proposed reclassification of carnauba wax to and move its listing from §205.605(a) to §205.606, making its use subject to provision requiring use of the organic form if commercially available. OPWC supports this proposed change; we agree that organic sources of waxes should be used, when commercially available, in order to support their further development."
c. International Organic Inspectors Association (IOIA) states: "We strongly support and thank you for the following recommendations from your committee…" regarding the "Reclassification of Carnauba Wax to §205.606)."
d. Northwest Horticultural Council (NHC) states: "Upwards of 80% of the organic tree fruit crop is treated with carnauba wax."

Citric Acid

Preservative, flavors, color enhancement, and nutritional fortification

Petitioned by: Unknown in 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			1
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers	FPCC, SNF[b]		
Trade Associations / Industry Consultants	JPA, ADS OPWC, IFAC		OTA
Certifiers			MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "Citric acid should be classified as synthetic unless it is possible to define non-synthetic citric acid by annotation. If it is possible to define non-synthetic citric acid, then it should be annotated on §205.605(a). Otherwise, it should be removed from §205.605(a) and considered for listing on §205.605(b)."
b. Smucker Natural Foods (SNF) states: "Smucker Natural Foods supports the continued use of Citric Acid on Section 205.605(a) of the National List. Citric acid is used for lowering pH in beverages. There are no allowed alternatives available."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We do have clients using this. Our understanding is that most commercially available citric acid is derived by microbial fermentation of carbohydrate substances."

Dairy Cultures

To make dairy products, also as a stabilizer, flavor and acidifier

Petitioned/added: In 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers	StF		
Trade Associations / Industry Consultants	IOIA, ADS, IFAC		OTA
Certifiers		CCOF[b]	MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "Dairy cultures *per se* meet OFPA requirements, but there are many ancillary substances that must be reviewed. Beyond Pesticides supports the separate listing of dairy cultures because dairy cultures are produced on milk and not separated using chemical methods, so future annotations that may be necessary to distinguish acceptable fermentation processes and products are probably not needed for dairy cultures."
b. California Certified Organic Farmers (CCOF) states: "The Handling Subcommittee is correct—the listing of microorganisms is sufficient and a separate listing of dairy cultures is not necessary. CCOF thus supports removing dairy cultures from the National List."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Every cheese processor uses them. Many of them have ag ancillary ingredients."

Diatomaceous Earth

Food filtering aid only

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Diatomaceous Earth from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA		OTA
Certifiers			MOSA[a]

Notes:

a. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Sometimes used as a filtration aid for liquid products like syrup."

Enzymes

Processing aid

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Enzymes from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA, ADS, IFAC		OTA
Certifiers	CCOF		MOSA[b]

Notes:

a. Beyond Pesticides (BP) states: "Enzymes should be classified as synthetic unless annotated to define those that have not undergone synthetic chemical change. The review of ancillary substances should include all such substances, including those on the National List."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Many of our cheese processors use non-animal-derived enzymes. Many of them have ag ancillary ingredients."

Flavors

Food flavoring aid

Sunset 2017: To be discussed at the spring 2015 meeting

Vote in Subcommittee:
Motion to remove Flavors from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens	1	1	
Public Interest Groups			BP, NOC[a], CR[b]
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, ADS FEMA[c]		IOIA[d], OTA[e]
Certifiers	CCOF		QAI, MOSA[f]

Notes:

a. National Organic Coalition (NOC) states**: "**We support the proposal to annotate flavors by adding a commercial availability provision. We also support the plan recommended by the NOSB in 1995 for moving to wholly organic flavors, and urge the NOSB to keep up the momentum generated by this proposal."
b. Consumer Reports (CR) states: "We urge the NOSB to remove flavors from the National List. 7 CFR §205.600(b)(4) states that substances should not be added to the National List if their primary use is to recreate or improve flavors. Recreating or improving flavors seems to be the only purpose of flavors. The petition by the Organic Trade Association to change the annotation shows that many organic flavors are already commercially available."
c. Flavor and Extract Manufacturers Association states (FEMA) states: "FEMA is pleased to provide comments, which support the continued listing of non-synthetic flavors in §205.605(a) on the National List. (…) The supply of organic flavors is not sufficient to warrant the sunset of non-synthetic flavors from §205.605(a). (…) Any regulatory action should both encourage further organic development in the flavor category and also maintain the integrity and supply of processed organic food products that utilize non-synthetic flavors but cannot, due to issues of supply, quality, or functionality, utilize currently available organic flavors."
d. International Organic Inspectors Association (IOIA) states: "We strongly support and thank you for the following recommendations from your committee…" regarding the revised 'natural flavor' to require organic forms be used when commercially available."
e. Organic Trade Association (OTA) states: "All use of organic flavors is voluntary. We believe the organic flavor supply has grown to a size where it is no longer appropriate to simply allow the use of non-organic natural flavors when organic forms may be commercially available. At the same time, the number of available certified organic flavors is not sufficient to completely meet the current needs of the marketplace, given the numerous and different types and forms used by the organic sector."
f. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We also allow many examples of wood being used for its flavoring characteristics – whiskey barrels, smoked meats… Requiring commercial availability for flavors is consistent with the rule and would open a market for them."

Kaolin

Processing aid, filtering aid

Petitioned/added: In 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens	1		
Public Interest Groups			BP_b
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	NHC_a, JPA 1		
Certifiers	CCOF		

Notes:

a. Northwest Horticultural Council (NHC): "….as it is one of the few effective tools available for the control of petal fall pests, such as codling moth or sawfly, that affect young tree fruit and can cause devastating losses if left unchecked. As an added benefit, kaolin clay sprays also protect young fruit from sunburn, thus increasing the overall quality of mature fruit."
b. Beyond Pesticides (BP) states: "Given the equivocal support for kaolin among users, Beyond Pesticides is neutral on its relisting."

Lactic Acid

As an acidulant, a preservative, a stabilizer, a humectant, and as a taste and flavor enhancer.

Sunset 2017: to be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		Cornucopia[a]	BP[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, ADS, IFAC		OTA
Certifiers			MOSA[c]

Notes:

a. The Cornucopia Institute states: "Cornucopia opposes the relisting of Lactic acid on the National List under §205.605(a) Non-synthetics allowed, but supports the listing of Lactic acid under §205.605(b) Synthetics allowed. In so far as the commercial production process necessitates the inclusion of synthetic chemical reactions and that truly non-synthetic lactic acid is unavailable, then lactic acid should be re-classified as synthetic under §205.605(b) and its usage restricted to uses compliant with §205.600(b)(4)."

b. Beyond Pesticides (BP) states: "L-lactic acid should be reclassified as synthetic and considered for listing on §205.605(b). L-lactic acid is also present in some foods by virtue of *in situ* fermentation, and this is not synthetic. The microorganisms responsible for the fermentation are on the National List. If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Primarily for carcass wash. Many of our meat processors use lactic acid."

Magnesium Sulfate

Processing aid in tofu making; a flavor enhancer

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers			CCOF[b]

Notes:

a. Beyond Pesticides (BP) states: "Given the lack of support, Beyond Pesticides recommends letting magnesium sulfate sunset."
b. California Certified Organic Farmers (CCOF) states: "Magnesium sulfate can be used in the production of tofu. Alternative coagulants include calcium sulfate and magnesium chloride. CCOF does not have any clients using magnesium sulfate; all three tofu producers we certify use calcium sulfate or magnesium chloride. CCOF has no knowledge of availability of non-synthetic magnesium sulfate."

Nitrogen

Preservative aid, cryogenic aid

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA ADS		OTA
Certifiers			MOSA[a]

Notes:

a. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We have seen use in packaging. We might benefit from more education regarding the oil-free restriction. We seem to recall this is rarely at issue."

Oxygen

Used in the processing of olives and modified atmosphere packaging

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "The HS proposal did not mention any public comment. Given the lack of support, Beyond Pesticides recommends letting oxygen sunset."

Perlite

Filtering aid

Petitioned/added: In 1996
Sunset 2017: To be discussed at the spring 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA		OTA
Certifiers			

Potassium Chloride

Salt substitute

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	ADS		OTA
Certifiers			MOSA[a]

Notes:

a. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "What is excessive content of chloride in the soil?"

Potassium Iodide

Food additive/dietary supplement

Petitioned/added: In 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		OTA
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of potassium iodide with the annotation, 'as a sanitizing agent and as a source of iodine when required by law.' If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

Sodium Bicarbonate

Processing aid, leavening agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, ADS IFAC		OTA
Certifiers			MOSA[a]

Notes:

a. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Used in the baking industry."

Sodium Carbonate

Processing aid, neutralizing agent

Petitioned/added: In 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	ADS, IFAC		
Certifiers			

Wood Rosin

Fruit and vegetable coating

Petitioned/added: In 1996
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			Cornucopia, BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IFAC		NHC_b
Certifiers	CCOF		$MOSA_c$, $OMRI_d$

Notes:

a. Beyond Pesticides (BP) states: "We support the listing of carnauba wax on §205.606 and relisting of wood rosin on §205.605(b) only if they are annotated with, 'Not extracted using volatile synthetic solvents, contains only ancillary substances approved for organic production'; presence must be labeled on individual items."
b. Northwest Horticultural Council (NHC) states: "We estimate that about 20% of organic tree fruit growers in the region use this product."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "That avocado may not be 100% organic. This can create some confusion at the retail level when used on produce. Shelf displays may not enable consumers to know what's waxed and what isn't. Non-retail cases also may not declare use of waxes."
d. Organic Materials Review Institute (OMRI) States: "OMRI supports the technical correction to replace 'resin' with 'rosin'."

Yeast

Processing aid, leavening agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(a)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA[a], ADS		OTA
Certifiers	CCOF		MOSA[b]

Notes:

a. International Organic Inspectors Association (IOIA) supports the recommendations by the subcommittee regarding 'Ancillary Substances' for yeast.
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Many ancillary substances."

HANDLING 2017 SUNSET MATERIALS
§205.605(b) Synthetics Allowed

Acidified Sodium Chlorite (ASC)

Sanitizing agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(b)
Yes: 0 No: 4 Abstain: 0 Absent: 3 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens	1	1	
Public Interest Groups			BP_b
Food Processors / Handlers	AOD, Perdue Food		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC, IOIA $OMRI_a$		OTA
Certifiers			

Notes:

a. Organic Materials Review Institute (OMRI) States: "The listing at 21 CFR 178.1010(b)(46) states that ASC may be formulated with "a solution of sodium gluconate, citric acid, phosphoric acid, and sodium mono- and di-dodecylphenoxybenzenedisulfonate." OMRI believes the current annotation permits the use of these ancillary ingredients in ASC formulations under the current listing at §205.605(b). OMRI asks that the NOSB confirm whether these ancillary substances are allowed. This policy would also align with the allowance for formulants in peracetic acid formulas."

b. Beyond Pesticides (BP) states: "The listing for ASC should be annotated, 'No detectable residue may be present in the final food.' If the NOSB chooses this option, then we suggest that the current motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

Alginates

Stabilizers, thickeners, emulsifiers

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.605(b)
Yes: 0 No: 4 Abstain: 0 Absent: 3 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, ADS IFAC		
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Alginates should be removed from the National List unless they have allowed uses for which they are essential."

Ammonium Bicarbonate

Processing aid, leavening agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Ammonium bicarbonate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	AOD, GM		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		OTA
Certifiers			

Ammonium Carbonate

Leavening Agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove Ammonium carbonate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Given the lack of support, ammonium carbonate should be allowed to sunset."

Ascorbic Acid

Preservative, antioxidant, color enhancement, and dietary supplement

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Ascorbic Acid from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[b]	
Food Processors / Handlers	AOD, FV[a] SNF		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA ADS		OTA
Certifiers			MOSA[c]

Notes:

a. Fetzer Vineyards (FV) states: "Ascorbic acid additive is a valuable tool in the production of organically grown and organic white wines."
b. Beyond Pesticides (BP) states: "Ascorbic acid should be allowed to sunset from the National List because it is a synthetic chemical used for purposes that are not allowed by §205.600(b)."
a. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Some use."

Calcium Citrate

Buffering and sequestering agent, preservative, flavors, color enhancement, and nutritional fortification

Petitioned/Added: 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Calcium Citrate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, ADS		
Certifiers			$MOSA_b$

Notes:

a. Beyond Pesticides (BP) states: "Many, if not all, of the uses of the citrates are prohibited by §205.600(b)(4) –preservative, flavors, color enhancement, and nutritional fortification. The uses of calcium citrate should be restricted to uses that are in compliance with §205.600(b)(4). If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Some use."

Calcium Hydroxide

Processing aid, buffering and firming agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Calcium Hydroxide from §205.605(b).
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA ADS		OTA
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "The listing for calcium hydroxide should clarify which uses are permitted. If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

Calcium Phosphates: mono-, di-, tri-basic

Processing aids, dough conditioners, leavening, buffering and firming agents

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Calcium phosphates from §205.605(b)
Yes: 0 No: 6 Abstain: 1 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			2
Public Interest Groups			BP_a, NOC_b, CR_c
Food Processors / Handlers	AOD, WWF		
Ingredient Suppliers / Material Manufacturers			
/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, ADS IFAC		OTA
Certifiers			$MOSA_d$

Notes:

a. Beyond Pesticides (BP) states: "We disagree with the proposal to vote to relist them at this meeting, then review all phosphates at the spring 2016 meeting. Instead, the NOSB should postpone consideration of the phosphates until the spring and consider the sunset along with any annotations that may be appropriate. If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
b. National Organic Coalition (NOC) states: "We ask that the NOSB table the vote on these sunset materials until a TR addressing all relevant questions has been received." NOC's comments include a list of questions they believe should be answered by a TR regarding phosphates.
c. Consumer Reports (CR) states: "Rather than proceed with a vote at this meeting, we urge that the proposals be tabled until the Board has a more thorough understanding of these ingredients' essentiality and impacts on public health."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Some use."

Carbon Dioxide

Carbonation agent; extracting agent; propellant and preservative

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Carbon Dioxide from §205.605(b)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		
Food Processors / Handlers	SNF AOD, FV_a		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA OPWC		OTA
Certifiers			$MOSA_b$

Notes:

a. Fetzer Vineyards (FV) states: "Carbon dioxide is a naturally occurring by-product of primary yeast fermentation. Blanketing wines with carbon dioxide gas, post fermentation, protects the wines from oxidation."

b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Commonly used."

Chlorine Materials: Calcium hypochlorite, Chlorine dioxide, Sodium hypochlorite

Disinfecting and sanitizing agents

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Chlorine Materials from §205.605(b)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens	1		
Public Interest Groups			BP_a, NOC_b, CFS_c
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers	GeaWsWest		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, OPWC IOIA, ADS		OTA, NHC_d
Certifiers	CCOF		$MOSA_e$

Notes:

a. Beyond Pesticides (BP) states: "Rather than simply proposing another renewal of the use of chlorine-based materials, the NOSB subcommittees should commission a TR that: 1. Determines what disinfectant/sanitizer uses are required by law, and 2. Comprehensively examines more organically compatible methods and materials to determine whether chlorine-based materials are actually needed for any uses. If there are uses for which chlorine is necessary, then the NOSB should include them in the National List and limit the use to those particular uses."
b. National Organic Coalition (NOC) states: "The NOSB and NOP need to clarify whether chlorine is required by other statutes. If other laws specifically require the use of chlorine, then it must be allowed under the organic program and these uses should be documented on the National List."
c. Center for Food Safety (CFS) states: "CFS recommends that the NOSB pursue a two-fold strategy to achieve an overall reduction in the use of chlorine in organic systems: 1. Promote alternative sanitizing practices and methods that eliminate the need for chlorine disinfectants, and 2. Provide clarification for producers regarding when sanitizing is necessary and when cleaning is sufficient. In addition, the use of chlorine on contact surfaces should be addressed separately from the use of dissolved chlorine in tanks, especially with regard to foods that can absorb some of the wash water.
d. Northwest Horticultural Council (NHC) states: "…sanitizer in the post-harvest process (e.g., the sanitization of water used for cooling or wash). Also used for sanitation and cleaning of equipment and containers used in organic handling…"
e. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Chlorine is widely used as a sanitizer on vegetable operations."

Ethylene

Processing aid (de-greening and ripening agent)

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove Ethylene from §205.605(b)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC, IOIA		OTA
Certifiers	CCOF		

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides opposes the relisting of ethylene, because it is incompatible with organic agriculture."

Ferrous Sulfate

Processing aid in animal feed; a dietary supplement

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Ferrous Sulfate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		OTA
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Ferrous sulfate should be phased out. (…) Meanwhile, the annotation should be changed to 'for iron enrichment or fortification of foods when required by law.' We suggest that the current motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

Glycerides, mono- and di-

Processing aids, emulsifiers, and release agents; also used as ancillary substances

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Glycerides, mono- and di- from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a] Cornucopia[b]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			OTA
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides opposes the relisting of mono- and di-glycerides because there are non-synthetic and organic alternatives."
b. The Cornucopia Institute states: "Cornucopia opposes the relisting of Glycerides (Mono and Di) under §205.605(b) Synthetics allowed, given that alternatives exist and that the 2015 Limited Scope TR was inadequately researched and failed to point out that mono- and diglycerides are likely to contain trans fats, which have no known health benefits and for which there is no safe level to eat."

Glycerin

A flavor carrier, solvent, emollient, bodying agent, plasticizer, pharmaceutical agent, and sweetening agent

Petitioned by: Draco Natural Products Inc.
Petition for: The removal of "Glycerin—produced by hydrolysis of fats and oils" be removed from the National List at §205.605(b) because certified organic glycerin is now commercially available in sufficient quantities to meet the demand of the organic processed food and cosmetic products producers.)

Vote in Subcommittee:
Motion to remove Glycerin from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seek Clarification
Farmers / Citizens	2		
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD, SNF BFC[b]		
Ingredient Suppliers / Material Manufacturers	DSM		
Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA		OTA
Certifiers / Materials Review Organizations			MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "Although we have problems with the new listing, Beyond Pesticides does not oppose relisting glycerin as currently listed and annotated."
b. Botanical Food Company PTY. Ltd (BFC) states: "From our research we, too, have found extremely limited supply of organic glycerin in the quality, quantity, and form needed for our products. A rule change making organic glycerin compulsory, particularly in the made with organic category, would increase demand and almost certainly leave us in a situation of non-supply."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "See the separate petition to list glycerin at 606. Seems reasonable. This states that saponification of organic fats and oils, using a National List-consistent alkali, enables a product to be both synthetic and organic. This is useful precedent when looking at other saponified products."

Hydrogen Peroxide

Sanitizing agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Hydrogen Peroxide from §205.605(b)
Yes: 0 No: 4 Abstain: 0 Absent: 3 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP		NOC
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers	Biosafe Systems		
Trade Associations / Industry Consultants	OPWC IOIA, ADS		OTA
Certifiers			MOSA[a], NHC[b]

Notes:

a. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Used by many. Common sanitizer component."
b. Northwest Horticultural Council (NHC) states: "This product is used by 100% of organic tree fruit growers. At least 60% of packinghouse facilities use PAA."

Magnesium Carbonate

Filtration aid, buffering, drying, anti-caking, and color retention agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Magnesium Carbonate from §205.605(b)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers		PCC	
Trade Associations / Industry Consultants			
Certifiers			MOSA[b]

Notes:

a. Beyond Pesticides (BP) states: "Given the lack of support, Beyond Pesticides supports allowing magnesium carbonate to sunset."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Sometimes found as an additive in salt, but deemed to affect label claim, so operators choose alternatives."

Magnesium Chloride

Processing aid, color enhancement, coagulant, firming agent (tofu)

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Magnesium Chloride from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		OTA
Certifiers	CCOF		

Notes:

a. Beyond Pesticides (BP) states: "The HS should revisit the classification decision for magnesium chloride derived from sea water. If it is found to be non-synthetic, then it should be petitioned for listing on §205.605(a) and removed from §205.605(b). As a non-synthetic, the use for color enhancement would not be contrary to §205.600(b)(4). Nevertheless, the only use supported by comments is the use for tofu, so we support an annotation of the new listing, 'as a coagulant in making tofu.'"

Magnesium Stearate

Processing/formulation aid, flowing/binding, anticaking agent, tablet lubricant

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Magnesium Stearate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP[a]		Cornucopia[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IFAC		
Certifiers	CCOF		

Notes:

a. Beyond Pesticides (BP) states: "We share the concerns raised by Cornucopia, and do not oppose the relisting of magnesium stearate, because it is used only in 'made with organic' products and, hence, does not threaten organic integrity."

b. The Cornucopia Institute states: "…the evaluation of magnesium stearate must take into consideration the use of pesticides/genetic engineering in the non-organic production of oils used for its manufacture and the availability of organic oils, or sustainably produced palm oil, for this purpose."

Nutrient Vitamins and Minerals

Fortification, supplementation, antioxidants, coloring agents

Petitioned/Added: 1995
Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Nutrients Vitamins and Minerals from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens		2	
Public Interest Groups		NOC[a], FWW[b], CFS[c] CR	BP[d]
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA, ADS, IFAC		OTA
Certifiers	CCOF		MOSA[e]

Notes:

a. National Organic Coalition (NOC) states: "Synthetic or non-organic additives used for nutrient supplementation or fortification should be limited to those that are essential. This does not mean those that are considered 'essential nutrients,' but rather those that are essential to making an organic product because fortification or supplementation is required by law."

b. Food & Water Watch (FWW) states: "Synthetic or non-organic additives used for nutrient supplementation or fortification should be limited to those that are essential. This does not mean those that are considered 'essential nutrients,' but rather those that are essential to making an organic product because fortification or supplementation with these specific additives is required by law. NOSB should remove 'nutrient vitamins and minerals' from the National List and continue the process of individual substance review."

c. Center for Food Safety (CFS) states: "With the 'nutrient vitamins and minerals' annotation still in place, food manufacturers can add synthetic and non-organic ingredients that do not appear on the NL, as long as they can be considered a "nutrient"—a substance that provides nourishment. Yet, the NOP has yet to amend or clarify the listing. FDA, on the other hand, has clarified that 21 CFR 104.20 does not apply to the addition of substances such as DHA and ARA oil, taurine, or sterols to infant formula, milk, pet food, or energy bars as nutrients. While this clarification should apply to the NOP's nutrients listing, substances like synthetic taurine have been detected in organic infant formula… Even nutrients that have been individually petitioned and rejected by the NOSB continue to appear in organic foods, without penalty… **CFS strongly opposes the relisting of 'nutrient vitamins and minerals' with the current broad category annotation. Allowing for categorical listings on the NL violates OFPA, which specifically requires that all synthetic substances used in organic production systems are reviewed by the NOSB before being added them to the NL."**

d. Beyond Pesticides (BP) recommends: "…. amending this listing to restrict the use of any supplemental vitamins and minerals to only those instances in which FDA regulations require such supplementation. If the NOSB chooses this option, then we suggest that the current motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

e. Midwest Organic Services Association (MOSA), summarizing their survey of inputs, states: "There are ancillary substances. We verify non-GMO ancillaries. Water-based or non-GMO oil-based have been allowed. Liquid formulations are understood to be important for proper dispersal within products."

Ozone

Disinfectant, post-harvest treatment

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from Ozone from §205.605(b)
Yes: 0 No: 4 Abstain: 0 Absent: 3 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers	1		
Citizens			1
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD, FV		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC, IOIA, ADS		OTA
Certifiers			MOSA[b], NHC[c]

Notes:

a. Beyond Pesticides (BP) states: "We do not oppose relisting of ozone in view of the many users who depend on it and its non-toxic residue. However, ozone is a powerful oxidizer and is not as benign as some commenters believe, so we encourage the NOSB to seek alternatives."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Generally promoted as a very green sanitizer option. We have determined that use in water or in atmosphere does not affect the 100% organic claim. This enables operators to use a sanitizer without affecting the sensible 100% organic status of their single ingredient fruits and such."
c. Northwest Horticultural Council (NHC) states: "Ozone is used in 50% or more of packinghouses handling organic tree fruit."

Phosphoric Acid

Cleaning agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Phosphoric Acid from §205.605(b)
Yes: 0 No: 4 Abstain: 0 Absent: 3 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers			
Citizens		1	
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, ADS, IFAC		OTA
Certifiers			$MOSA_b$, NHC_c

Notes:

a. Beyond Pesticides (BP) states: "Phosphoric acid poses environmental hazards in manufacture and disposal, and health risks during use. Because its use is slightly different from the other materials examined here, there may not be a more compatible substance in this list. We encourage the NOSB to continue to seek safer alternatives."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Common dairy sanitizer."
c. Northwest Horticultural Council (NHC) states: "Used by approximately 20% of handlers of organic tree fruit."

Potassium Acid Tartrate

Leavening and buffering agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Potassium acid tartrate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP_a		
Food Processors / Handlers	AOD, FV_b		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA ADS		OTA
Certifiers	CCOF		

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides asks the HS to revisit the classification of potassium bitartrate."
b. Fetzer Vineyards (FV) states: "The use of potassium acid tartrate, or cream of tartar, is important in facilitating the removal of naturally existing tartrates in wine during the cold stabilization process. Without the use of this input, wine could create tartrate crystals in the bottle, causing consumer concern."

Potassium Carbonate

Used for pH control, alkalinizing and leavening agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove Potassium Carbonate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	ADS		
Certifiers	CCOF		

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides asks the HS and NOSB to consider the essentiality of potassium carbonate."

Potassium Citrate

Chelating agent, buffering agent, nutrient supplement, pH adjuster, flavor adjuvant, flavor enhancer, and as a medication

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Potassium Citrate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, ADS		OTA
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Many, if not all, of the uses of the citrates are prohibited by §205.600(b)(4) – preservative, flavors, color enhancement, and nutritional fortification. The uses of potassium citrate should be restricted to uses that are in compliance with §205.600(b)(4)."

Potassium Phosphate

pH control in dairy products, sequestrant, emulsifier

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Potassium Phosphate from §205.605(b)
Yes: 3 No: 2 Abstain: 1 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			2
Public Interest Groups			BP_b CR_c
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers		PCC	
Trade Associations / Industry Consultants	ADS, $IFAC_a$		OTA, NOC_d
Certifiers			

Notes:

a. International Food Additives Council (IFAC) states: "We caution the NOSB on any restriction of phosphate additives before a thorough review of the scientific literature is undertaken. While critics can cherry-pick studies, NOSB decisions should be based on the overwhelming weight of the scientific evidence. There are no alternative organic substances or other practices that would make these substances unnecessary. As such, IFAC strongly encourages the NOSB to relist this important ingredient for organic production."

b. Beyond Pesticides (BP) states: "The NOSB should seek to eliminate the use of inorganic phosphates in organic food. If it is not possible to totally eliminate them, the listings should be annotated to eliminate uses prohibited by §205.600(b)(4). We thank the HS for commissioning a technical review on the phosphates, but we disagree with the proposal to vote to relist them at this meeting, then review all phosphates at the spring 2016 meeting. Instead, the NOSB should postpone consideration of the phosphates until the spring, and consider the sunset along with any annotations that may be appropriate. If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

c. Consumer Reports (CR) states: "We appreciate the Handling Subcommittee's request of a new technical review (TR) to better understand the recent scientific studies that raise concerns regarding public health impacts of phosphate food additives. We urge the NOSB to table the vote until the TR is available. "

d. National Organic Coalition (NOC) states: "NOC is supporting the Handling Subcommittee's decision to request a technical review (TR) on this topic. We ask that the NOSB table the vote on these sunset materials until a TR addressing all relevant questions has been received."

Sodium Citrate

Emulsifier, buffering aid, acidulant.

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Sodium citrate from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers	StF		
Trade Associations / Industry Consultants	IOIA, IFAC		OTA
Certifiers	CCOF		

Notes:

a. Beyond Pesticides (BP) states: "Unlike other citrates that have many uses prohibited by §205.600(b)(4) – preservative, flavors, color enhancement, and nutritional fortification—the uses of sodium citrate appear to comply with OFPA. Beyond Pesticides does not object to the relisting of sodium citrate."

Sodium Hydroxide

Cleaning agent, pH control, alkalinizing agent, processing aid

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Sodium hydroxide from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups			BP_b
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM, VSC_a		
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA		OTA
Certifiers	CCOF		$MOSA_c$

Notes:

a. Vermont Soap Company (VSC) states: "…I ask the Board to please help legitimize the organic soap claims being made by dozens of certified brands, and to develop a recommendation to NOP for guidance or instruction on the use of sodium and potassium hydroxide in NOP certified soap and soap products."
b. Beyond Pesticides (BP) states: "Beyond Pesticides asks the HS and NOSB to consider the essentiality of sodium hydroxide."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Used mostly as a cleaning agent for milk lines & for egg washes. Use of NaOH has removed processed products from 100% category."

Sodium Phosphates

Emulsifier, stabilizers, preservatives, and to create certain textures in dairy foods

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Sodium Phosphates from §205.605(b)
Yes: 1 No: 4 Abstain: 1 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		1	
Farmers			2
Public Interest Groups			BP_b, CR_c
Food Processors / Handlers	AOD WWF, GM		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers	StF	PCC_a	StF
Trade Associations / Industry Consultants	CROPP ADS, IFAC		OTA, NOC_d
Certifiers			$MOSA_e$

Notes:

a. PCC Natural Markets (PCC) states, quoting Janeen Leon, MS, RD, LD, a researcher at the Center for Reducing Health Disparities at MetroHealth Medical Center in Cleveland: "In addition to chronic kidney disease and increased mortality rates," she says, "phosphate additives have been linked to an increased risk of heart disease, they're thought to accelerate the aging process, and they interfere with the way your body activates vitamin D. Too much phosphorous can also lead to weakened bones."

b. Beyond Pesticides (BP) states: "The NOSB should seek to eliminate the use of inorganic phosphates in organic food. If it is not possible to totally eliminate them, the listings should be annotated to eliminate uses prohibited by §205.600(b)(4). We thank the HS for commissioning a TR on the phosphates, but we disagree with the proposal to vote to relist them at this meeting, then review all phosphates at the spring 2016 meeting. Instead, the NOSB should postpone consideration of the phosphates until the spring, and consider the sunset along with any annotations that may be appropriate. If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

c. Consumer Reports (CR) states: "We appreciate the Handling Subcommittee's request of a new technical review (TR) to better understand the recent scientific studies that raise concerns regarding public health impacts of phosphate food additives. We urge the NOSB to table the vote until the TR is available. "

d. National Organic Coalition (NOC) states: "NOC is supporting the Handling Subcommittee's decision to request a TR on this topic. We ask that the NOSB table the vote on these sunset materials until a TR addressing all relevant questions has been received."

e. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Used in making processed cheese products."

Sulfur Dioxide

Antioxidant to prevent spoilage and oxidation in wine

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Sulfur Dioxide from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			2
Farmers			
Public Interest Groups	BP		
Food Processors / Handlers	AOD, FV_a		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers	Chartrand Imports, Organic Vintners		
Trade Associations / Industry Consultants	JPA		OTA
Certifiers			

Notes:

a. Fetzer Vineyards (FV) states: "Sulfur dioxide is commonly added during the processing of wine to further boost its anti-oxidant potential, and aids in inhibiting undesirable microbial growth. It is also used in empty barrels to prevent microbial growth, and to prevent the oxidation."

Tocopherols

Antioxidants

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Tocopherols from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		Cornucopia[b]	BP[d]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Wholesalers/Distributors / Retailers		PCC[c]	StF[e]
Trade Associations / Industry Consultants	JPA, IOIA ADS		OTA
Certifiers	CCOF, QAI[a]		MOSA[f]

Notes:

a. Quality Assurance International (QAI) states: "QAI would like to respectfully recommend that this board consider maintaining this material on §205.605(b) until there has been an in-depth assessment of the tocopherols currently in use, and until final guidance on classification of materials has been issued by the NOP."
b. The Cornucopia Institute states: "Cornucopia **opposes the relisting of Tocopherols under §205.605(b) Synthetics allowed**, and **supports the listing of Tocopherols under §205.605(a) Non-synthetics allowed**, with an annotation stating "**Only natural tocopherols extracted without synthetic solvents**". Furthermore, the NOSB should encourage the production of organic tocopherols by placing an expiration date on the §205.605(a) listing."
c. PCC Natural Markets (PCC) states: "We ask the NOSB to prohibit synthetic tocopherols in organic foods, most notably from infant formula, because they are harmful to human health."
d. Beyond Pesticides (BP) states: "The Handling Subcommittee must investigate the availability of natural tocopherols. If natural tocopherols are available, then they should be removed from §205.605(b) and petitioned for §205.605(a). The NOSB should encourage the production of organic tocopherols by placing an expiration date on the §205.605(a) listing."
e. Stonyfield (StF) states: "Stonyfield uses two ingredients, fish oil and Vitamin D, that contain tocopherols as an ancillary substance. At this point in time, we do not see adequate evidence that there is enough tocopherol available in non-synthetic form, and at a comparable quality, to make us believe that reclassification of tocopherols from §205.605(b) to §205.605(a) would not jeopardize the supply of ingredients like fish oil that rely on tocopherols as an ancillary substance."
f. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "This is used in some personal care products."

Xanthan Gum

Stabilizer, thickener, emulsifier, suspending agent, foam enhancer

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Xanthan Gum from §205.605(b)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			1
Farmers			
Public Interest Groups		Cornucopia[a]	BP[b]
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA ADS, IFAC		OTA
Certifiers			

Notes:

a. The Cornucopia Institute states: "Cornucopia **opposes the relisting of xanthan gum under §205.605(b)** Synthetics allowed because:
   - Many of the substrates used in the production of xanthan gum may be of GMO origin;
   - Organic or natural agricultural substitutes exist, and;
   - The main use of xanthan gum is as a texturizer and stabilizer, uses that are not permitted by the organic regulations as stated in §205.600(b)(4).

   Furthermore, **Cornucopia opposes the reclassification of xanthan gum** to §205.605(a) Non-synthetics allowed or to §205.606 Non-organic agricultural products, and recommends that a new Technical Review be requested before moving to reclassify or renew this material on the National List."

b. Beyond Pesticides (BP) states: "Xanthan gum should be removed from the National List, unless it has allowed uses for which it is essential."

HANDLING 2017 SUNSET MATERIALS §205.606 – Non-organically Produced Agricultural Products Allowed as Ingredients in or on Processed Products Labeled as "Organic"

Casings

The intestines of beef, lamb and pork are used to make natural casings for sausage

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Casings from §205.606(a)
Yes: 0 No: 6 Abstain: 1 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		OTA[b]
Certifiers/MROs			MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "The NOSB should discuss ways to encourage the availability of organic casings, and add an expiration date as a way of incentivizing the development of an organic alternative."
b. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "No known organic alternatives, and surveys indicate a need for continued listing."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We also see use of cellulose casings. We have prohibited use of collagen casings, unless they're obviously peel able and not intended to be eaten."

Celery Powder

Curing agent in meat products.

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove celery powder from §205.606(b)
Yes: 1 No: 6 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		3	1
Farmers	8		
Public Interest Groups		BP[f]	NOC, CR[h], Cornucopia[i]
Food Processors / Handlers	Applegate[a], CNF[b], F.Usinger, Inc., Lorentz Meats		
Ingredient Suppliers / Material Manufacturers	Kerry, Inc.[c]		
Distributors / Retailers		PCC[g]	
Trade Associations / Industry Consultants	CROPP[d], JPA, IOIA, CCOF[e]		OTA[j]
Certifiers/MROs			MOSA

Notes:

a. Applegate states: "Celery powder has been a critical ingredient of our hams, bacon, and hot dogs and is needed to develop color, texture, flavor, and functionality to meet the consumers' expectations of 'cured' meat attributes. To date, celery has been the vegetable of choice to culture for the conversion of sufficient nitrates to nitrites to provide the necessary pathogen control to assure food safety, and none of our vendors have been able to find a suitable organic alternative thus far."

b. Coleman Natural Foods (CNF) - Perdue Foods, LLC - states: "Without this ingredient, organic versions of ham, bacon, hotdogs, pepperoni, and some sausages would essentially disappear from the market, harming processors and retailors, but most importantly, harming organic farmers and ranchers who would be without these significant markets for bellies, hams, and trimmings."

c. Kerry Inc. states "…we have not found a viable, functional organic version of celery powder or vegetable alternatives that possess the level of nitrates needed to meet the market's flavor, color, and functionality requirements… We are committed to continuing our work to find an alternative. We strongly urge the NOSB Handling Subcommittee to move forward with a recommendation that supports the use of celery powder beyond 2017."

d. CROPP Cooperative states: "CROPP Cooperative's Organic Prairie brand relies on celery powder in 24 different products for 23% of our total business, 55% of our pork business." The CROPP Cooperative also states, regarding food safety: "Nitrate/ nitrite, from any source, is very important for food safety, as a control for pathogens such as clostridium botulinum and listeria monocytogenes."

e. California Certified Organic Farmers (CCOF) states: "Celery powder (2 OSPs) Celery powder is used as a source of naturally occurring nitrates and nitrites in organic sausage production. It is a critically important material for the two sausage producers certified by CCOF."

f. Beyond Pesticides (BP) states: "The use of celery powder is a way of artificially adding nitrate as a preservative at levels not possible to achieve through use of organic celery. Nitrates pose dangers to health when artificially enhanced in food."

g. PCC Natural Markets (PCC) states: "Since organic celery power is widely available, non-organic celery powder no longer should be allowed in organic food production."

h. Consumer Reports (CR) states: "We question why organic celery powder is not suitable, and removing celery powder from the National List will create incentives for the industry to use organic celery powder. Taking advantage of a prohibited process to make a conventional ingredient acceptable does not comport with organic, and diminishes the integrity of the label. "

i. The Cornucopia Institute states: "In light of the apparent lack of viable alternatives, and potential hardship to organic farmers, The Cornucopia Institute stands neutral as to the relisting of Celery Powder under §205.606(b); however, the Cornucopia Institute supports the reclassification of Celery Powder to §205.605(b) Synthetics allowed. In addition, The Cornucopia Institute strongly calls for a full technical review, to better evaluate this material, and additional research to develop a viable organic alternative within the next 5 years. It is unlikely that Cornucopia will take a neutral position when Celery Powder is reviewed during at its next sunset."
j. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "No known organic alternatives, and surveys indicate a need for continued listing."

Chia (*Salvia hispanica L.*)

Nutrient booster

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Chia (*Salvia hispanica L*) from §205.606(c)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a], CR[b], CFS	
Food Processors / Handlers		SNF	
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			OTA[c]
Certifiers/MROs		CCOF	MOSA[d]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides opposes the relisting of chia seeds because the supply of organic chia is sufficient."
b. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List."
c. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "…surveys indicate a sufficient organic supply IS available."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We do see use of colors, and sometimes a color is a combination of materials on .606. Use of an affidavit, as has been used for flavors, would be good. We've not developed this."

Colors: Various

Food coloring agents

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:

1. Motion to remove the thirteen (13) colors as listed from §205.606
   Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0
2. Motion to remove the four (4) colors as listed from §205.606
   Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		1	
Farmers			
Public Interest Groups		BP[f], CR[g], CFS, Cornucopia[h]	BP[i]
Food Processors / Handlers	SNF, WWF[a]		
Ingredient Suppliers / Material Manufacturers	GNT[b]		GO[j]
Distributors / Retailers	WYC[c], FPCC, StF[d]		
Trade Associations / Industry Consultants	JPA[e], ADS, IACM		OTA
Certifiers/MROs	QAI		OTCO[k]

Notes:

a. White Wave Foods (WWF) states: "We would specifically like to see the continued listing of… purple/black carrot juice."
b. GNT USA, Inc. (GNT) states: "We believe that removing any of the colors listed herein would negatively impact the organic food industry and limit consumers to fewer organic finished product options. Therefore, we would suggest relisting."
c. Wallaby Yogurt Company (WYC) would like to continue the allowance of black/purple carrot juice color.
d. Stonyfield (StF) states: "While some of these colors listed may be commercially available in organic form, we think that black/purple carrot juice extract, carrot juice extract, and turmeric extract color cannot yet be said to be commercially available in organic form, because the quality is not comparable. We urge the NOSB to keep these colors on §205.606, all of the colors."
e. Juice Products Association (JPA) states: "JPA does not agree with the proposal to remove the 13 colors from the National List. Organic colors do not always provide the color hue that is required in a finished product. For example, carrot colors from various sources have different hues, stabilities, and intensities. It will be difficult for manufacturers to use only organic colors, when the manufacture of such colors does not produce a hue, intensity, and stability that is required, or that can be used in some foods."
f. Beyond Pesticides (BP) states: "Beyond Pesticides supports the proposal to remove the above 13 colors, and we thank the HS for its research into the availability of organic alternatives. These colors should be removed from §205.606, because they are commercially available in organic form in sufficient supply..."
g. Consumer Reports (CR) states: "We support the HS in its proposal to remove 13 colors from the National List. We are pleased that the HS acknowledges the public comments expressing concern that these colors fail the OFPA criteria of compatibility with organic farming and handling. However, we disagree with the Handling Subcommittee's proposal to keep 4 colors on the National List, as this creates a serious inconsistency. How can 4 conventional colors meet the requirements when 13 conventional colors fail to meet them?"
h. The Cornucopia Institute states: "Cornucopia rejects the relisting of colors on the National List under §205.606, non-organically produced agricultural products allowed as ingredients in or on processed products labeled as 'organic.' Colors from non-organic fruit or vegetable sources may contain significant amounts of pesticide residues, a human health threat. In addition, there appears to be a sufficient supply

of organic sources of fruit and vegetable extracts used as colors to justify the removal of all colors from §205.606(d)."

i. Regarding the motion to relist beet, black currant, pumpkin juice, and red cabbage colors, Beyond Pesticides (BP) states: "Beyond Pesticides urges the HS to take another look for organic colors in this motion. (…) we believe that organic sources are available for beet juice extract color, black currant juice color, and red cabbage extract color and would be adequate if they were delisted, which would create greater demand."
j. Global Organics (GO) maintains that sufficient stocks of organically grown beets and blackcurrants are available to allow for colorant uses, and that these colors should be removed from the National List per the text of the NOP final rule.
k. Oregon Tilth (OTCO) states: "Commonly quality is cited an issue that is associated with certain organic forms of non-organic ingredients found on the National List."

Dillweed Oil

Flavoring agent

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in subcommittee:
Motion to remove dillweed oil from §205.606(e)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a], CR[b]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "There are 20 pesticides with established tolerances for dill, 9 are acutely toxic, creating a hazardous environment for farmworkers; 19 are linked to chronic health problems, such as cancer; 5 contaminate streams or groundwater; and 16 are poisonous to wildlife."

b. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from 205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List."

Fish Oil

Used in organic processing and handling as an ingredient to increase the content of omega-3 fatty acids

Sunset 2017: To be voted on at the fall 2015 meeting
Vote in Subcommittee:
Motion to remove Fish Oil from §205.606
Yes: 2 No: 4 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		13	
Farmers			
Public Interest Groups		BP[c], NOC[d], CR[e] FWW[f], CFS, Cornucopia[g]	
Food Processors / Handlers	AOD[a]		
Ingredient Suppliers / Material Manufacturers	GOED[b] DSM		
Distributors / Retailers	StF		PCC[h]
Trade Associations / Industry Consultants	IOIA CROPP		OTA[i]
Certifiers/MROs			

Notes:

a. Aurora Organic Dairy (AOD) states: "This substance is an agricultural source of Omega 3 EPA and DHA fatty acids, which are beneficial to human health and nutrition. EPA and DHA fatty acids are unique to and both found in Fish Oil while other common sources, such as Algae, only contain DHA fatty acid."
b. Global Organization for EPA and DHA Omega-3's (GOED) states: "Samples analyzed are well within accepted standards for contaminant allowances."
c. Beyond Pesticides (BP) states: "Beyond Pesticides is strongly committed to the conservation of biodiversity, and until sustainable practices can be defined to conform to organic standards in compliance with OFPA, we oppose the relisting of fish oil."
d. National Organic Coalition (NOC) states: "Fish oil production is unsustainable because it uses the forage fish relied upon by so many fish, seabirds, and marine mammals for their survival. Moreover, as an ingredient in processed foods, its health benefits claims remain unsupported by scientific research, and its health risks pose concern for consumers."
e. Consumer Reports (CR) states: "fish oil is not a necessary ingredient in organic foods. Consumers who wish to consume fish oil for its purported health benefits can purchase fish oil separately. It is misleading to consumers, and creates inconsistency to the organic label to add non-organic and non-essential ingredients to organic foods."
f. Food & Water Watch (FWW) states: "…given the unsustainable nature of fish oil production and its incompatibility with the principles of organic, Food & Water Watch supports the recommendation to remove fish oil from the section §205.606 of the National List."
g. The Cornucopia Institute states: "Cornucopia opposes the relisting of fish oil on the National List under §205.606 as a non-organically produced ingredient allowed in or on processed products labeled as 'organic' without rigorous annotations related to environmental and human health concerns."
h. PCC Natural Markets (PCC) states: "NOSB must consider whether organic consumers are adequately protected from contaminants in fish oil by the current listing. NOSB also must consider ecological balance and biodiversity when allowing fish oil from wild fish. These are fundamental considerations that organic consumers will expect as NOP moves toward establishing a framework for organic aquaculture."
i. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "No known organic alternatives and surveys indicate a need for continued listing."

Fructooligosaccharides

Soluble prebiotic fiber, sweetening agent, flavor enhancer, bulking agent, and humectant

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Fructooligosaccharides from 205.606(h)
Yes: 1 No: 4 Abstain: 2 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP_a, CR_b	
Food Processors / Handlers	AOD_c		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	JPA		
Certifiers/MROs			$MOSA_d$

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticide supports removing FOS from §205.606, because it is not an agricultural product."
b. Consumer Reports (CR) states: "We urge the NOSB to remove fructooligosaccharides (FOS) from the National List. Like fish oil, FOS is not necessary to the production of an organic food. FOS specifically is added to allow manufacturers to make certain health claims related to the perceived health benefits of highly isolated fibers and sugars. We noted in our spring 2015 comment that FOS, along with inulin, present a case study for how OFPA criteria have been ignored during review of 606 materials."
c. Aurora Organic Dairy (AOD) states: "AOD requests that Fructooligosaccharides (FOS) remain on the National List. FOS provides digestive support as a prebiotic and helps promote calcium absorption. This substance is a health benefit and essential to the dairy industry."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "At least one mfr. has switched to organic."

Galangal, frozen

Flavoring agent, spice

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove galangal, frozen from §205.606(i)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a], CR[b]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "No TR or TAP has ever been produced for galangal."
b. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List."

Gelatin

Clarification or fining agent in teas and wine, as a stabilizer and thickener, and in capsules; ingredient or processing aid

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove gelatin from §205.606(j)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			BP_a
Food Processors / Handlers	SNF, AOD		
Ingredient Suppliers / Material Manufacturers	DSM		
Distributors / Retailers	FPCC		
Trade Associations / Industry Consultants	IOIA		OTA_b
Certifiers/MROs			$MOSA_c$

Notes:

a. Beyond Pesticides (BP) states: "…there is a clear need to separate the listing into two listings –for fish gelatin and gelatin from any or mixed sources. If the NOSB believes that a listing for the latter is still necessary, then the change of annotation can be put on the HS agenda for another time. If the supply of organic gelatin is sufficient to meet the needs for gelatin not necessarily derived from fish, then the separate listings should be proposed during this sunset cycle. If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

b. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "Organic alternatives are available, but survey responses indicate supply/quality issues."

c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Consider need for use in encapsulation. There may now be some organic capsules, but these may not be appropriate for all uses."

Gums: Arabic, Carob bean, Guar, Locust bean

Binders and thickening agents in food

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Gums, water-extracted only (Arabic; Guar; Locust bean; and Carob bean) from §205.606(k)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		2	
Farmers			
Public Interest Groups			BP_b
Food Processors / Handlers	SNF, AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA ADS_a, IFAC		OTA_c
Certifiers/MROs			$MOSA_d$

Notes:

a. Association for Dressings and Sauces (ADS) states: "The use of these gums, as well as other ingredients on the National List, provides manufacturers with options to produce a wide variety of organic dressing and sauce products, thereby offering consumers choices of such products to meet their particular lifestyle preferences, such as optimal weight maintenance."
b. Beyond Pesticides (BP) states: "The HS should consider an annotation that separates the three gums, so that organic supply (including wild-crafted organic) can be taken into account for those that are produced organically or wild-crafted. If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
c. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "Organic alternatives are available, but survey responses indicate supply/quality issues."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Sometimes we see products that combine organic and non-organic gums. Organic sources of some of these are available and used."

Inulin-Oligofructose Enriched

Soluble prebiotic fiber, sweetening agent, flavor enhancer, bulking agent and humectant

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove inulin-oligofructose enriched from §205.606(l)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a], CR[b]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	JPA		
Certifiers/MROs			MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the HS proposal to remove IOE from §205.606 because IOE is not an agricultural product, and IOE from organic inulin is available."
b. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We believe we've seen operations switch to organic."

Kelp

Thickener and dietary supplement

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Kelp from §205.606
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		2	
Farmers			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	ADS		
Certifiers/MROs			MOSA[b], CCOF

Notes:

a. Beyond Pesticides (BP) states: "Because of the issues of contamination and overharvesting, Beyond Pesticides opposes the relisting of kelp."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Must be organic in livestock feed, but not always in human consumption products. "

Konjac Flour

Gelling agent, stabilizer, thickener, film former, and fat replacer

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Konjac flour from §205.606
Yes: 4 No: 3 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		CR_b	BP_c
Food Processors / Handlers	SNF		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	$IFAC_a$		
Certifiers/MROs			

Notes:

a. International Food Additives Council (IFAC) states: "IFAC acknowledges the sources of organic konjac powder cited in the meeting materials document. However, we have a number of concerns about these suppliers and whether the konjac they offer is truly in compliance with organic standards. While IFAC has not been able to evaluate the specific suppliers noted, we are aware of significant quality issues that some formulators have experienced with so-called 'organic' additives from China. Given the uncertainty of quality, consistency, abundance of supply, and other unknowns, we caution the NOSB as failure to relist konjac in favor of organic supply that originates from China could have a major impact on the quality and suitability of organic products."

b. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List."

c. Beyond Pesticides (BP) states: "Even if the HS and NOSB decide that the need for konjac flour overrides the environmental and health hazards created by its production in a non-organic system, the subcommittee should acknowledge those factors and state that the need outweighs them. Beyond Pesticides supports the delisting of konjac flour because of the hazards cited above and the availability of organic konjac, as documented by the HS."

Lecithin – de-oiled

Used ingredient in food, as an emulsifier, dispersing agent, and to reduce the hydration properties of powders in water and milk products

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove Lecithin – de-oiled from §205.606
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens	1_a		
Farmers			
Public Interest Groups		BP_b Cornucopia$_c$	
Food Processors / Handlers	AOD, BFC_d		
Ingredient Suppliers / Material Manufacturers	DSM		
Distributors / Retailers			
Trade Associations / Industry Consultants	$IOIA_e$ $IFAC_f$		OTA_g
Certifiers/MROs			

Notes:

a. A citizen states: "We request that any decision regarding lecithin also consider availability of non-allergenic sources such as sunflower lecithin."
b. Beyond Pesticides (BP) states: "Beyond Pesticides supports the delisting of de-oiled lecithin because of the hazards associated with its production and the availability of organic lecithin."
c. The Cornucopia Institute opposes the relisting of lecithin – de-oiled under §205.606(p) given the commercial availability of organic de-oiled lecithin.
d. Botanical Food Company PTY. Ltd (BFC) states: "Soy lecithin is by far the most readily available source, but is limited in its application due to being a food allergen. Alternative sources identified by the subcommittee as emerging alternatives, such as sunflower and canola are non-allergenic substances, and therefore offer a unique and important role within the food industry. We request that any decision regarding lecithin also consider availability of non-allergenic sources such as sunflower lecithin."
e. International Organic Inspectors Association (IOIA) states: "Lecithin – de-oiled. Should be retained for at least another 5 years until supply is stable."
f. International Food Additives Council (IFAC) states: "We strongly agree with other commenters that there have been consistency of supply concerns with the single source of organic de-oiled lecithin. It does not seem prudent to rely on a single supplier of this ingredient given its importance. We also note that the only organic variety currently available is a soy-based de-oiled lecithin and some formulators do not wish to use a soy-based ingredient due to allergenic concerns. We agree that progress is being made towards organic alternatives, but strongly agree that more time is needed to allow for additional growth in supplies of de-oiled lecithin. Therefore, IFAC respectfully requests the continued inclusion of 'lecithin, de-oiled' on the National List."
g. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "Organic alternatives are available but survey responses indicate supply/quality issues."

Lemongrass – frozen

Flavoring ingredient

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove Lemongrass – frozen from §205.606(p)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP, CR[a] CFS	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	JPA		OTA[b]
Certifiers/MROs			

Notes:

a. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List. "

b. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "…surveys indicate a sufficient organic supply IS available."

Orange Pulp, dried

Moisture retention agent and fat substitute

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Orange pulp, dried, from §205.606(q)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse:

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[b], CR[c]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers	Fiberstar[a]		
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Fiberstar, Inc., states: "The availability of organic raw materials to manufacture dried orange pulp has not improved since Fiberstar first petitioned to add dried orange pulp to the National List in 2008. ... Most of the organic citrus production in California, Texas, and Arizona is sold on the fresh market while Florida citrus is traditionally grown for processing. … Over 75% of the Florida citrus crop has already been affected by citrus greening disease. … With limited control methods against this disease available to organic growers, the effect on organic citrus crops in Florida is even more severe. The organic juice producers that Fiberstar consulted have all seen a drop in the availability of organic Florida oranges."

b. Beyond Pesticides (BP) states: "Beyond Pesticides supports the HS proposal not to relist dried orange pulp, which is produced by practices dangerous to workers and the environment and was not supported by comments."

c. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from 205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves and whey protein concentrate. We urge the NOSB to remove these materials from the National List. "

Orange Shellac, unbleached

Coating for fruit and vegetables as well as a confectionary glaze

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee
Motion to remove Orange Shellac from §205.606(r)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Petition	Oppose Petition	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			Cornucopia, BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers		1[d]	
Distributors / Retailers	FPCC		
Trade Associations / Industry Consultants			OTA[b], NHC[c]
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Given the lack of information on the production of orange shellac and ancillary substances, Beyond Pesticides cannot support relisting. However, if waxes are relisted, all non-organic waxes applied to organic produce should be labelled. We are unclear as to meaning of the HS statement, 'The Handling Subcommittee recognizes this issue and urges voluntary labeling of produce coatings, but is unable to put forward an additional labeling annotation.' Does the subcommittee mean that the NOSB cannot annotate at sunset or that a labeling annotation is not possible? If the NOSB chooses this option, we suggest that the motion be sent back to the HS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
b. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "No known organic alternatives and surveys indicate a need for continued listing."
c. Northwest Horticultural Council (NHC) states: "May be used as component of carnauba based waxes."
d. Ferrara Pan Candy Company (FPCC) states: "Orange shellac-unbleached is derived from the exudate of the lac beetle. Challenges in sourcing an organic supply are similar to honey/beeswax. It is required for the appearance of chocolate-coated products. Also used as a barrier layer to keep moisture from hydroscopic products such as sour jelly beans. Renewal is essential for keeping these products on the market."

Pectin (Non-Amidated Forms Only)

Gelling agent in jams, preserves, fillings and other products

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Pectin (non-amidated forms only) from §205.606(s)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support Petition	Oppose Petition	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups	Cornucopia[a]		BP[b]
Food Processors / Handlers	AOD, SNF		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers	FPCC, StF		
Trade Associations / Industry Consultants	JPA, IOIA ADS, IFAC		IOIA[c], OTA[d]
Certifiers/MROs			CCOF

Notes:

a. The Cornucopia Institute states: "Cornucopia supports the relisting of Pectin – (Non-amidated forms only) under §205.606(s) with the recommendation that the availability of organic sources be further investigated and that annotations be added requiring that:
   - Only organic sugar and ancillary substances listed on the National List be allowed in pectin formulations.
   - Only low-methoxy pectins produced via an enzyme-mediated process be allowed for use in foods labeled organic."

b. Beyond Pesticides (BP) states: "A listing on §205.606 should be limited to high methoxyl pectin (HMP), which is extracted from citrus peel and apple pomace. In reviewing the impact of the manufacture of HMP, the HS must consider the impacts of raising the non-organic crops used to produce it. Since low methoxyl pectin (LMP) is synthetic because it is the result of a chemical process that demethylates high methoxyl pectin, it should be delisted and considered for listing on §205.605(b)."

c. International Organic Inspectors Association (IOIA) supports the recommendations by the Subcommittee regarding "Ancillary Substances" for Pectin.

d. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "No known organic alternatives and surveys indicate a need for continued listing."

Peppers (Chipotle chile)

Spice (flavoring agent)

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Peppers (Chipotle chile) from §205.606(t)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support relisting	Oppose relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP, CR_a CFS	
Food Processors / Handlers		GM	
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			OTA_b
Certifiers/MROs			

Notes:

a. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List. "

c. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "…surveys indicate a sufficient organic supply IS available."

Seaweed, Pacific Kombu

Edible seaweed utilized for flavoring, as a thickening agent, and as a base for broth

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Seaweed, Pacific Kombu from §205.606(u)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Petition	Oppose Petition	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Because of the issues of contamination and overharvesting, Beyond Pesticides opposes the relisting of Pacific Kombu."

Starches: Cornstarch (Native), Sweet Potato

Thickeners, formulation aids, bulking agents and moisture adsorption agents

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Cornstarch (native), and Sweet Potato Starch from §205.606(v)
Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

	Support relisting	Oppose relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a]	BP[b]
Food Processors / Handlers	AOD, GM SNF		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, ADS		OTA[c]
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Sweet potato starch should be removed from §205.606. Its listing has never been supported by a Technical Review or TAP review, conventional sweet potatoes are grown with many pesticides, and there was no support expressed for relisting at the spring meeting. Furthermore, the HS did not provide any support for relisting sweet potato starch in its proposal."
b. Beyond Pesticides (BP) states: "The evaluation of cornstarch must take into consideration the use of pesticides in the non-organic production of corn and ensure that GMO corn is not used in organic products. The NOSB must consider the availability of organic corn for this purpose, as well as the potential availability of cornstarch if the demand existed."
c. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "Organic alternatives are available, but survey responses indicate supply/quality issues."

Turkish Bay Leaves

Food flavoring herb

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Turkish bay leaves from §205.606(x)
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP, CR[a], CFS[b]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			OTA[c]
Certifiers/MROs			

Notes:

a. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves and whey protein concentrate. We urge the NOSB to remove these materials from the National List."

b. Center for Food Safety (CFS) states: "According to Amy's Kitchen, who originally petitioned Turkish bay leaves be added to the NL in 2006, the company has found a supplier to meet its needs. A "concern" – not a demonstrated demand or need — has been expressed by some about the consistency of Turkish bay leaf supplies. However, an internet search for "wholesale Turkish bay leaf" has revealed multiple, bulk suppliers of this commonly available herb from *Spicely Organic*, *Monterey Bay Spice Company,* and *Starwest Botanicals,* to name a few. CFS supports its removal from the NL**."**

c. Organic Trade Association (OTA) summarizes the result of surveys conducted, stating: "NOSB vote is to remove but member indicates that it may still be needed. Supply is fragile and there is no guarantee that they can consistently get organic. If it's removed from the National List they may need to move their product to the 'made with' category."

Wakame Seaweed (*Undaria pinnatifida*)

Edible seaweed, most often served in soups and salads

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Wakame seaweed from §205.606(y)
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Because of the issues of contamination and overharvesting, Beyond Pesticides opposes the relisting of wakame."

Whey Protein Concentrate

A source of protein, a fat replacer, a texturizer

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Whey Protein Concentrate (WPC) from §205.606
Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP_a, CR_b CFS_c	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			CCOF

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the HS proposal not to relist whey protein powder. In addition to the availability of organic whey protein powder noted by the HS, the use of a non-organic source of a high percentage of a macronutrient in an organic product is not compatible with organic handling."

b. Consumer Reports (CR) states: "We support the Handling Subcommittee's proposals to remove the following from §205.606: chia seed, colors, dillweed oil, frozen galangal, inulin, konjac flour, lemongrass, orange pulp, chipotle peppers, Turkish bay leaves, and whey protein concentrate. We urge the NOSB to remove these materials from the National List. "

c. Center for Food Safety (CFS) states: "CFS supports the Subcommittee's proposal to delist whey protein powder. In addition to the commercial availability of organic whey protein powder, non-organic whey comes from cows that may have been treated with antibiotics, hormones, or other animal drugs… The adverse human, animal, and environmental health effects of non-organic dairy production makes non-organic whey protein concentrate wholly incompatible with organic."

CROPS PROPOSALS

Annotation Change for Micronutrients

A change to the annotation is being proposed. Instead of the sentence, "Soil deficiency must be documented by testing," we are proposing, "Deficiency must be documented." This change allows for the deficiency to be documented by other types of testing, professional recommendation, or published information specific to a crop or region.

Petitioned: July 7, 2015

Vote in Subcommittee:

1. Crops Subcommittee vote for annotation change
   Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0
2. Crops Subcommittee vote to remove
   Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Annotation Change	**Oppose Annotation Change**	**Neutral/ Seeks Clarification**
Farmers / Citizens	1	72	
Public Interest Groups		BP[a] Cornucopia[b]	NOC[c]
Food Processors / Handlers	AOD[d]		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC[e], JPA, IOIA, OTA[f], CROPP	Green Field Farms[i]	
Certifiers	CCOF[g], VOF[h]	OEFFA[j]	MOSA[k]

Notes:

a. Beyond Pesticides (BP) states: "We oppose the annotation change because it encourages the use of synthetic micronutrients without empirical evidence to demonstrate need."

b. The Cornucopia Institute states: "Confirmation of known regional deficiencies 'by cooperative extension agents and publications' is problematic because such opinions and publications are not necessarily based on evidence at the site, and some of these experts continue to hold biases against organic production."

c. National Organic Coalition (NOC) states: "…we concur with the Crops Subcommittee that the annotation for this material should be framed to foster methods of determining deficiencies in addition to analytical soil testing. In contrast, we do not agree with the Crop Subcommittee's suggestion that 'awareness of regional deficiencies' provides sufficient reason for use of a synthetic micronutrient. Instead, we suggest that the justification for use of micronutrient applications be linked to verifiable, site-specific information. Further, we suggest that at times the annotation on documenting deficiency may have to focus on the *crop* in addition to or instead of the *soil*."

d. Aurora Organic Dairy (AOD) states: "…we support the idea put forward by the Crop Subcommittee of a separate proposal that would change the annotation for Micronutrients to '…soil deficiency must be documented' thus clarifying that soil testing isn't the only means for documenting soil micronutrient deficiencies…".

e. Organic Produce Wholesalers Coalition (OPWC) had specific comments about the proposed annotation changes, as follows: "…we concur with the Crops Subcommittee that the annotation should be framed to allow ways to determine deficiencies other than through analytical testing to identify soil deficiencies. However, we do not agree with the Crop Subcommittee's suggestion that 'awareness of regional

deficiencies' provides sufficient reason for use of a synthetic micronutrient. And, as far as basing the reason for use on the advice of an advisor, it has been our experience in working with growers that some advisors sell specific micronutrient products and therefore have an interest in advocating for their use. Instead, we suggest that the justification for use of micronutrient applications be linked to verifiable, site-specific information.

"Further, we suggest the annotation support evaluations that may focus on the *crop* instead of just looking at *soil* deficiencies; as we consider applications of synthetic micronutrients most appropriate for addressing acute, short-term problems. Corrections of micronutrient deficiencies in organic soils and in nutrient uptake interactions require a more systematic, longer-term approach such as rotating crops, cover cropping, increasing organic matter, and adjusting soil pH.

"With these points in mind, we suggest the following annotation of the sentence of interest: '*Deficiency must be documented through verifiable, site-specific methods and accompanied with a plan for future correction of the deficiency.*'"

f. Organic Trade Association (OTA) states: "OTA supports the CS proposal, which acknowledges that farmers use a variety of methods to determine if and when to use micronutrients for their crops. The current annotation which requires deficiencies be documented by testing overly restricts farmers' ability to use micronutrients."

g. California Certified Organic Farmers (CCOF) states: "We suggest removing the words 'by testing' after the word 'documentation'."

h. Vermont Organic Farmers (VOF) states: "Farmers have often been unhappy that the current standards require that they wait until their soils are deficient until they are allowed to address the issue. VOF's preference for an annotation change would be one that moves away from documented deficiencies and instead moves toward monitoring for accumulation of micronutrients in the soil. For example, Micronutrients-usage must be monitored to prevent accumulation."

i. A farmer owned co-op, Green Field Farms, states: "Having worked with a wide range of soil types from different areas of the United States, we continue to see insufficient amounts of micronutrients in the soil for excellent plant health. Some examples: Copper deficiency - lodging in small grains Manganese deficiency - chlorotic foliage in potatoes Boron deficiency - hollow stemmed broccoli, hollow hearts in potatoes, and skin cracking in cucumbers Zinc deficiency - low test weight in grains. We think applications of synthetic micronutrients is most appropriate for increasing soil levels along with other management practices like cover-cropping, crop rotation, adjusting soil PH, and not working wet soils for optimal organic farm ecology. Another example is when we have seen adequate levels of phosphorus in the soil although the plants were showing a deficiency and until the zinc levels were increased the phosphorus was not taken up by the plant. Having these points in mind we suggest the organic farmer still needs to demonstrate a verifiable need in order to avoid over-application and potential toxicity."

j. Ohio Ecological Food and Farm Association (OEFFA) states: "We support relisting the material and modifying its annotation as follows: 'A verifiable need must be demonstrated.'"

k. Midwest Organic Services Association (MOSA) states: "In summary, we support the proposed changes related to the micronutrient application requirements. We agree that diversified approaches are valid and sensible for determining micronutrient deficiencies. Allowing plant tissue tests, recommendations from professional crop consultants, recognition of regional deficiencies, and visual observations as tools to document micronutrient deficiencies is consistent with current MOSA policy. The proposed changes are practical and will allow flexibility for certifiers and encourage better input from crop consultants. However, we also would point out a few areas where more clarity is needed."

Annotation Change for EPA List 4 Inerts

The Crops and Livestock Subcommittees are working toward a solution for how to review inerts that were formerly on EPA List 4 by collaborating with the Inerts Working Group and the EPA Safer Choice Program (SCP) (formerly Design for the Environment Program)

Proposed Motion: to change the annotation as follows:
§205.601(m) and §205.603(e) – As synthetic inert ingredients as classified by the EPA, for use with non-synthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances.

(i) Substances permitted for use in minimal risk products exempt from pesticide registration under FIFRA section 25(b).2
(ii) Substances included on the EPA's Safer Chemical Ingredient List.
(iii) Inert ingredients that are exempt from the requirement of a tolerance under 40 CFR 180.1122 – for use only in passive pheromone dispensers.
(iv) [Reserved] (for any other inerts individually petitioned and reviewed)]

Votes in Subcommittee:
Crops Subcommittee vote: Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0
Livestock Subcommittee vote: Yes: 5 No: 0 Abstain: 0 Absent: 1 Recuse: 0

	Support Annotation	**Oppose Annotation**	**Neutral/ Seeks Clarification**
Farmers / Citizens	1_a	68	
Public Interest Groups		FWW_b	BP_c, CR_d, CFS
Food Processors / Handlers	WWF		AOD_e
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OTA $OMRI_f$ $OPWC_g$ $IOIA_h$ CROPP CPDA WDA		$BPIA_i$
Certifiers			$MOSA_j$

Notes:

a. Christopher Lish, a consumer, states: "The NOSB should: 1. Reject the proposed annotation change; 2. Tell the US Department of Agriculture (USDA) not to change the listing of 'inerts,' unanimously approved by the NOSB in 2012; 3. Implement the review plan approved unanimously by the board in 2012; 4. Amend the listing to remove toxic nonylphenol ethoxylates (NPEs), and; 5. Make changes only to hasten the review of so-called 'inerts'."
b. Food & Water Watch (FWW) states: "Food & Water Watch strongly opposes the proposed annotation that abandons the responsibility of the NOSB to review all synthetic inert ingredients. We support the proposal to eliminate nonylphenol ethoxylates from the list of allowed inerts."
c. Beyond Pesticides (BP) states: "We support the proposal of the Crops Subcommittee to annotate the listing for List 4 inerts to eliminate the use of nonylphenol ethoxylates (more properly termed alkylphenol ethoxylates).The proposal should apply to both listings –on §205.603(e) for use in livestock products as well as on §205.601(m) for crop products." Beyond Pesticides also states that only the

following should be listed in the annotation: "(i) substances formerly on EPA List 4A or 4B that have been reviewed according to OFPA criteria: [List]; and (ii) [Reserved] (for any other inerts individually petitioned and reviewed)." This is what would ultimately result in adoption of the fall 2012 recommendation and allow immediate NOSB reviews of inerts.

d. Consumer Reports (CR) states: "We believe that the NOSB should review 'inerts' in a transparent manner and according to OFPA criteria. We disagree with the Crops Subcommittee's proposal to replace NOSB review of 'inerts' with the requirement that the inerts are on EPA's Safer Chemical Ingredient List (SCIL), removing any independent NOSB review of decisions to list these synthetic materials. It is the statutory job of the NOSB to review all synthetic inputs in organic farming and handling. We believe maintaining the integrity of that process is critical. We urge the NOSB to immediately implement the recommendation it adopted unanimously in 2012 to review synthetic materials identified as 'inert' or 'other ingredients' in pesticide products used in organic production in a transparent fashion. We support the proposal to remove nonylphenol ethoxylates (alklyphenol ethoxylates) or NPEs/APEs from the list of 'inerts'."
e. Aurora Organic Dairy (AOD) states: "To change the annotation now would result in a potential gap of inert ingredients currently in use as allowed in List 4 to suddenly being disallowed as some may not be listed yet with the Safer Choice Program - Safer Chemical Ingredient List. The push for manufacturers to reformulate prior to Sunset 2017 is a heavy burden. We request postponing the proposed annotation change, or modifying the proposed annotation change to include Inert 4 substances to grant sufficient time to transition from the current annotation to the proposed annotation change."
f. Organic Materials Research Institute (OMRI) states: "The subcommittees state in the proposal that 'there is a lot of similarity between them but also some gaps that can be addressed by the NOSB in periodic review of the SCIL.' OMRI suggests that if the NOSB passes this recommendation, it would be helpful for the final recommendation to include a more specific plan of how the NOSB will address these gaps, and a rationale for moving forward with a recommendation prior to the gaps being addressed. A plan such as this will give transparency and integrity to the recommendation."
g. Organic Produce Wholesalers Coalition (OPWC) states: "We support the proposed annotation change." Continuing their comments with: "… although we support regulation of the inerts used by the organic industry, we advocate for an approach that balances responsibility for transparency and disclosure with practical review of inerts at each level at which it occurs within the organic regulatory system. OPWC supports the proposed annotation change because we believe it balances elements that are important to a range of organic stakeholders…".
h. International Organic Inspectors Association (IOIA) states regarding the recommended annotation change: "We strongly support and thank you for the following recommendations from your committee. It is our position that they represent an improved and sound and sensible approach to implementing the organic regulations."
i. Biopesticide Industry Alliance (BPIA) states: "BPIA respectfully asks the NOP/NOSB to allow the biopesticide industry to be part of the process that impacts our industry, which significantly impacts U.S. organic growers and U.S. organic crop production."
j. Midwest Organic Services Association (MOSA) states: "In summary, we support the proposed annotation change, but we have a few comments and questions about the proposed annotations."

Laminarin – petitioned

A pre-harvest pesticide to stimulate the plants' natural defense mechanisms

Vote in Subcommittee: The Crops Subcommittee believes that Laminarin is non-synthetic and therefore is allowed without need to add it to the National List.
Motion to classify Laminarin as petitioned as non-synthetic
Yes: 5 No: 0 Abstain: 0 Absent: Recuse: 0

	Support Classification	Oppose Classification	Neutral/ Seeks Clarification
Farmers / Citizens		4[a]	
Public Interest Groups		BP[b] Cornucopia [c]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, OPWC OMRI[d]		
Certifiers			

Notes:

a. A consumer states: "The subcommittee has not addressed the issue of whether laminarin and seaweed extracts might result in levels of exposure to plant-defensive chemicals that could prove toxic to consumers, but also result in levels of exposure that are toxic to pollinators. Our pollinators are already under duress and in danger of extinction."
b. Beyond Pesticides (BP) states: "Based on [the NOP] incomplete draft guidance, the CS has reached the conclusion that laminarin is nonsynthetic and the very similarly made seaweed extracts are synthetic. We (and a minority of the CS in 2014) have reached the conclusion that both are synthetic."
c. The Cornucopia Institute states: "We disagree with the NOP draft guidance for classification of materials as 'synthetic' based on terms like 'significant' or 'technical or functional effect'. The definition of 'synthetic' should be based on the method by which the material is derived."
d. Organic Materials Research Institute (OMRI) states: "The manufacturing process for laminarin as described in the Technical Report would result in a non-synthetic substance as defined by the draft Classification of Materials Guidance (NOP 5033)."

Lignin sulfonate – petitioned

For use as a floating agent in postharvest handling

Petitioned: 2014 petition by Organic Trade Association to remove Lignin Sulfonate from §205.601(l)(1) for its use as a floating agent in postharvest handling due to lack of use

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 5 No: 0 Abstain: 0 Absent: 1 Recuse: 0

	Support Petition to Remove	Oppose Petition to Remove	Neutral/ Seeks Clarification
Farmers / Citizens	1		
Public Interest Groups	BP[a] Cornucopia NOC		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OTA OPWC[b]		
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "The Crops Subcommittee has included an evaluation criteria checklist in its proposal that is incomplete. The X's in the boxes without citations would suggest to the public that the subcommittee did not adequately review the information necessary to make a determination."

b. Organic Produce Wholesalers Coalition (OPWC) states: "As handlers of fresh, organic produce, OPWC surveyed the growers who are the foundation of our distribution chain to determine whether any of them is still using lignin sulfonate for postharvest flotation. Our finding is that this material is no longer necessary in handling organic pears. Based on this information, we agree with the Crops Subcommittee that the material could be delisted at §205.601.L.1 without impacting the fresh produce sector."

Sulfuric Acid – petitioned

For use as a solubilizing agent to make micronutrients more available for plant uptake

Petitioned: 2015 by BioAtlantis, Ltd.

Vote in Subcommittee: Motion to list sulfuric acid, as petitioned, at §205.601
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Petition	Oppose Petition	Neutral/ Seeks Clarification
Farmers / Citizens	1[a]	2	1
Public Interest Groups		BP[b], Cornucopia[b], NOC	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants		OPWC	
Certifiers		OEFFA	

Notes:

a. A farmer states: "The NOP list for approved synthetics does not innumerate any reacted molecules from pH adjustments in liquid fish products. When reacted with phosphoric acid ammonia in fish becomes ammonium phosphate, when reacted with sulfuric acid magnesium in fish becomes magnesium sulfate etc. It is arbitrary and, in my opinion, poorly reasoned to pick one molecule that is already approved in many other organic products and the result of the same chemistry and source, and then deny it in this case."

b. Beyond Pesticides (BP) states: "Sulfuric Acid is hazardous to human health and the environment, is not necessary, and is inconsistent with organic practices."

c. The Cornucopia Institute states: "Allowing Sulfuric Acid for micronutrient production will open the door to allowing Sulfuric Acid use in other ways already accepted by conventional farming."

Seaweed Extracts (Aquatic Plant Extracts) – petitioned

For use as a fertilizer primarily to improve shoot growth and seed germination, increase root growth, and improve soil microbial count for use in various fruits, vegetables, and cereal crops

Petitioned: 2015 by BioAtlantis, Ltd.

Vote in Subcommittee:
Motion to classify as synthetic: Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0
Motion to add Seaweed Extracts §205.601: Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Petition	Oppose Petition	Neutral/ Seeks Clarification
Farmers / Citizens		11	
Public Interest Groups		BP[a] Cornucopia[b]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants		OPWC[c]	OMRI[d]
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "Based on [the NOP] incomplete draft guidance, the CS has reached the conclusion that laminarin is non-synthetic and the very similarly made seaweed extracts are synthetic. We (and a minority of the CS in 2014) have reached the conclusion that both are synthetic."
b. The Cornucopia Institute states: "The use of laminarin and seaweed extract activates plant secondary metabolites and plant defense chemicals that alter the chemical composition of the harvested crop."
c. Organic Produce Wholesalers Coalition (OPWC) states: "OPWC supports the position of the Crops Subcommittee that, because potassium hydroxide remains in the seaweed product at levels that have a 'functional effect' as a fertilizer, Brown Seaweed Extract must be classified as synthetic. Because OFPA prohibits the use of fertilizers that contain synthetic ingredients, we agree that Brown Seaweed Extract cannot be added to the [National List]."
d. Organic Materials Research Institute (OMRI) states: "The manufacturing process for this substance as described in the petition and the Technical Report involves potassium hydroxide as a final pH adjuster, which would result in a synthetic substance as defined by the draft Classification of Materials Guidance (NOP 5033)."

CROPS 2017 SUNSET MATERIALS
§205.601 Synthetic Substances Allowed for Use in Organic Crop Production

Alcohol: Ethanol, Isopropanol

As algicide, disinfectants, and sanitizer, including irrigation system cleaning

Sunset 2017: To be voted on at the fall 2015 meeting.

Vote in Subcommittee:
Crops Subcommittee vote to remove: Ethanol Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0
Crops Subcommittee vote to remove: Isopropanol Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4		
Public Interest Groups			BP_a
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC_b		OTA
Certifiers/MROs			MOSA

Notes:

a. Beyond Pesticides (BP) states: "It appears that the CS/LS did not investigate the availability of organic and/or non-synthetic alcohols from non-GMO fermentation organisms and feedstock."

b. Northwest Horticultural Council (NHC) states: "This alcohol is used strictly for the sanitation of irrigation equipment and is not applied to the edible portion of organic crops. Approximately 90% of regional organic tree fruit growers use this product."

Ammonium Carbonate

As insecticides, for use as bait in insect traps only; no direct contact with crop or soil

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD_b		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Given the apparent lack of support for ammonium carbonate among growers, [we are] neutral regarding the relisting of ammonium carbonate."
b. Aurora Organic Dairy (AOD) placed ammonium carbonate in a list of substances essential to organic crop production and requested its continued allowance on the National List.

Aquatic Plant Extracts

As plant or soil amendments, extraction process limited to potassium/sodium hydroxide

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		3[e,f]	
Farmers	2[a]		
Public Interest Groups		BP[b]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[c], IOIA		
Certifiers/MROs	CCOF[d]		

Notes:

a. A citizen states: "The most recent reference on over-harvest is a 1995 reference. Much debate and study has occurred in the 20 years since 1995 and, I think, warrants a different conclusion. Large-scale removal of rockweed is a recent phenomenon of about 20 years in Maine. Rockweed harvesting interests contend that no significant harm is done by Ascophyllum removal. Critics argue that the rockweed beds are essential protective habitat and food source for 150+ creatures, especially in early life stages. They believe that bulk removal, especially in conjunction with other pressures on declining ocean biodiversity, is a poor risk. Existing studies indicate that biodiversity is reduced after rockweed (Ascophyllum, kelp) harvest. Given the balance of considerations, it seems to me incorrect to list the abovementioned Ascophyllum extracts (aquatic plant extracts) as doing no harm to the environment."

b. Beyond Pesticides (BP) states: "Synthetic aquatic plant extracts are unnecessary. The aquatic plant extracts allowed by this listing are synthetic. According to the technical review, natural extracts are available."

c. Northwest Horticultural Council (NHC) states: "Long-used by farmers, these extracts are taken from many different species of kelp, acting as a natural fertilizer rich in amino acids, auxins, cytokinins, and gibberellins."

d. California Certified Organic Farmers (CCOF) states: "(589 OSPs) Seaweed extracts are an important element of the fertility program on many organic farms. Numerous formulations are used including Maxicrop Soluble Seaweed, several Acadian products, BioFlora Seaweed Creme, and Eco-Nutrients Eco-Nereo Kelp. Removal from the National List would significantly impact a large number of growers."

e. A citizen states: "The use of As containing seaweed fertiliser, therefore, may contribute to the arsenic burden of the environment and as such increase the probability of human exposure to As (Chen et al., 2006)."

Boric Acid

Used as an insecticide for ants and cockroaches

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 1 No: 4 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4		
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA CROPP		OTA
Certifiers/MROs	CCOF[b]		

Notes:

a. Beyond Pesticides (BP) states: "We suggest that the motion be sent back to the CS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

b. California Certified Organic Farmers (CCOF) states: "(65 OSPs): CCOF considers boric acid to be a benign and useful material for managing ants because it has low impact on natural enemies and honey bees (UC IPM 2015a). Formulations include MotherEarth Granular Scatter Bait and NiBan Granular Bait. It is often used as an ingredient in homemade ant bait stations."

Chlorine Materials: Calcium hypochlorite, Chlorine dioxide, Sodium hypochlorite

As algicide, disinfectants, and sanitizer, including irrigation system cleaning

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee: The Crops Subcommittee asked: 1. Are there less toxic disinfecting and sanitizing materials that could be practically substituted for chlorine materials in organic crop production? 2. Are all three of these chlorine materials needed for use in organic crop production?
Crops Subcommittee motion to remove calcium hypochlorite, chlorine dioxide, and sodium hypochlorite
Yes: 1 No: 4 Abstain: 0 Absent: Recuse: 0, same vote for all three.

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		2	
Farmers	5		
Public Interest Groups		BP[a]	Cornucopia[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		OMRI[d]
Certifiers/MROs	CCOF[c]		MOSA

Notes:

a. Beyond Pesticides (BP) states: "Alternatives to chlorine are available, and to the extent that the NOSB believes that disinfection is necessary, it should recommend that NOP guidance promote those alternatives."
b. The Cornucopia Institute states: "The NOSB subcommittees should commission a TR that (1) determines what disinfectant/sanitizer uses are required by law, and (2) comprehensively reviews more organically compatible methods and materials to determine whether chlorine-based materials are actually needed for any specific purposes."
c. California Certified Organic Farmers (CCOF) states: "(6 OSPs, undercounted): This material, otherwise known as bleach, is a relatively benign disinfectant. It is an important cleaning material for organic sprout producers. While listed on only 6 OSPs, it is a crucial production aid for these members. It is commonly and safely used in municipal water supplies."
d. Organic Materials Research Institute (OMRI) states: "Most chlorine materials are formulated with stabilizers and other inerts. The 2011 Technical Report did not address combinations of the substance, so it is unclear whether these ancillary substances are intended to be allowed under the current listings of chlorine materials."

Copper Sulfate and Copper, fixed

As a plant disease control, must be used in a manner that minimizes accumulation in soil

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 4 Abstain: 1 Absent: Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		2	
Farmers	6		
Public Interest Groups			Cornucopia[a], BP[b] CFS[c]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	Neudorff NHC[d], IOIA		OTA
Certifiers/MROs	CCOF[f]		VOF[e], MOSA[g]

Notes:

a. The Cornucopia Institute states: "We support the relisting with an added annotation stating: user needs to document multiple alternative attempts to control target including the adoption of high crop diversity in the field."
b. Beyond Pesticides (BP) states: "The NOSB must not let another sunset review of copper materials pass without taking steps to comply with §6517(b). We suggest that the motion be sent back to the CS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
c. Center for Food Safety (CFS) states: "Due to the toxicity of accumulated copper in soil and its aquatic toxicity, it is imperative that the NOSB support organic farmers in reducing its use and recommend that USDA allocate funds to assist in the development of alternative management practices. In this vein, CFS supports the recommendation to relist copper with the caveat that a robust research strategy must be recommended by the NOSB to the NOP and that urgent funding is sought to ensure that the research is carried out."
d. Northwest Horticultural Council (NHC): "These (mostly) insoluble fixed coppers are used as a fungicide on young, small fruits. Favored for their lower likelihood of generating phytoxicity. It is estimated that 100% of organic tree fruit growers in our region use this amendment."
e. Vermont Organic Farmers (VOF) states: "VOF strongly recommends annual soil testing from organic crop producers and copper is one of the materials evaluated in the standard fertility tests. Evaluating these tests allow us to monitor accumulation of copper in the soil."
f. California Certified Organic Farmers (CCOF) states: "(212 OSPs): This material is an important tool for organic rice growers, among others. We have no basis for concern over accumulation because we have not found rates or frequency to be excessive. We do not support additional annotations or verifications because we see no evidence that a problem of accumulation exists."
g. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Coppers are commonly used for blight control in solanaceous crops."

Elemental Sulfur

Insecticides, plant disease control, and as plant or soil amendments

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3		
Public Interest Groups			BP[a], Cornucopia[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC, JPA IOIA Neudorff, Granatstein		OTA
Certifiers/MROs	CCOF[c]		

Notes:

a. Beyond Pesticides (BP) states: "The NOSB must make a case for the need for sulfur in organic production, protect workers who use it, and ensure that its use does not result in ecological imbalance."
b. The Cornucopia Institute states: "Due to the harm to non-target organisms, the Crops Subcommittee should investigate the particular uses of Lime Sulfur and Elemental Sulfur in plant disease and insect control to determine when they are necessary and should propose an annotation for specific uses (i.e., fire blight)."
c. California Certified Organic Farmers (CCOF) states: "Elemental sulfur (2,042 OSPs): This material is listed as an insecticide, plant disease control, and plant or soil amendment. Elemental sulfur is still used in all three categories. Sulfur products used include InteGro Magic Sulfur Dust, Kumulus DF, Micro Sulf, Wilbur-Ellis Dusting Sulfur, and Microthiol Disperss."

EPA List 4 – Inerts of Minimal Concern

For use with non-synthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances

Note: Many commenters combined their comments about "EPA List 4 – Inerts of Minimal Concern" from Crops Substances, §205.601(m), and Livestock Substances, §205.603(e). For clarity, those comments are combined here as the annotation change is proposed under Crops Substances.

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Crops Subcommittee:
The Crops Subcommittee asked: 1. Please comment on the suitability of the alternatives mentioned for specific types of generic product formulations in specific situations. 2. Would removing NPEs from use with 2 years notice (from now) be sufficient time? How would this affect your business?
Crops Subcommittee motion to remove EPA List 4 – Inerts of Minimal Concern
Yes: 1 No: 4 Abstain: 0 Absent: 0 Recuse: 0

Vote in Livestock Subcomittee
Yes: 1 No: 4 Abstain: 1 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens	10_a		
Public Interest Groups			BP_b
Food Processors / Handlers	AOD_c		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	CPDA, OTA_d Neudorff, Granatstein		IOIA
Certifiers			$MOFGA_e$, $MOSA_f$

Notes:

a. Elizabeth Cunningham, Beverly Foster, Carla Cicchi, Arin Cyr, Mary Masters, Jennifer Lake, Beyond Pesticides, Michael Seager , Camille Gilbert , Anne Kelly, and Querido Galdo state: "NOSB should: (1) Reject the proposed annotation change; (2) Tell USDA not to change the listing of 'inerts,' unanimously approved by the NOSB in 2012; (3) Implement the review plan approved unanimously by the board in 2012; (4) Amend the listing to remove toxic nonylphenol ethoxylates (NPEs); and (5) Make changes only to hasten the review of so-called 'inerts'. 'Inerts' are only labeled this way because they are not the ingredient actively responsible for treating the targeted organism in any given agricultural product. The label indicates nothing about the 'inert' compound's actual toxicity and dangers associated with its use, giving end users a false sense of safety when reading this term on a label. 'Inerts' should require the same degree of rigorous review that any chemical gets from the NOSB for meeting OFPA standards."

b. Beyond Pesticides (BP) has detailed commentary on this issue, concluding: "The NOP must: Immediately issue a notification to manufacturers and users of products used in organic production with a request for information on current inert ingredients in use. Replace the language at sections 205.601(m) and 205.603(e) with: As synthetic other ('inert') ingredients in pesticide formulations as classified by the Environmental Protection Agency (EPA) for use with non-synthetic substances or synthetic substances

listed in this section that are used as an active pesticide ingredient in accordance with any limitations on the use of such substances. (i) Substances permitted for use in minimal risk products exempt from pesticide registration under FIFRA section 25(b); (ii) [List of approved other ('inert') ingredients, with expiration dates until reviewed individually, and excluding NPEs.] The NOSB must immediately begin reviews of 'inerts' used in organic production, proposing listing/delisting based on OFPA criteria."

c. Aurora Organic Dairy (AOD) states: "We request the continued allowance of EPA List 4 – Inerts of Minimal Concern as these substances are in a wide range of pest control products. To disallow these substances at this time would adversely affect organic livestock production."
d. Organic Trade Association (OTA) states: "Continued availability of effective and familiar pest control products is necessary for organic farmers to reliably bring their crops to market. It is critical that the availability of these products continue through the modernization of inerts review under USDA organic regulations. Renewing the allowance for EPA List 4 – Inerts of Minimal Concern will minimize disruptions to the organic farmer's toolbox."
e. Maine Organic Farmers and Gardeners Association (MOFGA) states: "Related to the sunset review of excipients, MOFGA recognizes that there are many difficulties for the NOSB and NOP to fund and perform reviews of extensive lists of materials allowed for organic livestock production. But we do not feel that a complete acceptance of all FDA approved materials is the correct path. So we are recommending that all FDA approved excipients be allowed but that the right is reserved for the NOSB to evaluate and recommend prohibition for any specified excipient. Another option would be for criteria similar to the Safer Choice list being established for inerts be established for excipients. Should any changes be made regarding excipients, we would ask that producers, manufactures and certifiers be given sufficient notice within which to communicate about and facilitate the change."
f. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Allowed inerts need clarity."

Ethylene gas

As plant growth regulators; for regulation of pineapple flowering

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Crops Subcommittee:
Motion to remove Ethylene from §205.601(k)
Yes: 4 No: 0 Abstain: 1 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		Cornucopia[a] BP[b]	
Food Processors / Handlers	SNF		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC[c] IOIA[d], OTA[e] IOS		
Certifiers			

Notes:

a. The Cornucopia Institute states: "Ethylene gas is hazardous to humans and the environment, is not essential for organic production, and is incompatible with organic production as a synthetic growth regulator."
b. Beyond Pesticides (BP) states: "No checklist was provided at the spring meeting" and "ethylene gas is not essential for organic production."
c. Organic Produce Wholesalers Coalition (OPWC) had detailed commentary on the use of ethylene gas, stating: "OPWC reached out to pineapple growers through our supply chains and received numerous comments from growers in Central America; they were unanimous in stating that the ethylene is necessary to the production of pineapples that they ship to the United States."
d. International Organic Inspectors Association (IOIA) states: "It is essential to allow for coordinated transport of organic pineapples. This material is equally important to all pineapple producers, both small and large."
e. Organic Trade Association (OTA) states: "For organic pineapple producers who are not close to their markets and rely on wholesale exports of their crops, ethylene is an essential tool."

Horticultural Oils

For insect and plant disease control

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4		
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[b], JPA IOIA Granatstein		OTA
Certifiers/MROs	CCOF[c]		

Notes:

a. Beyond Pesticides (BP) states: "We suggest this annotation: 'Steps to meet worker protection standards must be documented in the Organic System Plan. Must not be used when predators, parasitoids, or pollinators are present.'"

b. Northwest Horticultural Council (NHC) states: "When mixed with an emulsifier and diluted in water, the oil can be applied as a spray at the very beginning of the bloom season to kill pests such as aphids, mites, and scale. Furthermore, horticultural oils can be used to fight powdery mildew."

c. California Certified Organic Farmers (CCOF) states: "(1,041 OSPs): Oils are used for both insect and plant disease management. Typical brand name products are IAP Hi 440 Supreme Spray and IAP Summer 415 Spray Oil. No better alternatives are known."

Humic Acids

As plant or soil amendments

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 2 No: 2 Abstain: 1 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3		
Public Interest Groups			BP[a], Cornucopia[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[c], OPWC[d], IOIA, OTA[e] CROPP		
Certifiers/MROs	CCOF[f] WSDA		MOSA[g], OEFFA[h]

Notes:

a. Beyond Pesticides (BP) states: "Synthetic humic acid may play a role in the transition to organic, but is incompatible with organic practices and should not be used on certified organic farms. An annotation to the effect that 'humic acid may be used in the transition to organic if accompanied by a plan for building soil that provides adequate nutrition through soil-building practices and organic inputs' would be acceptable. If the NOSB chooses this option, then we suggest that the current motion be sent back to the CS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

b. The Cornucopia Institute states: "The relisting for humic acids should include an annotation requiring that humic acids used in organic crop production come from sources with a low potential for environmental and human harm due to coal mining, based on the findings of a new Technical Report."

c. Northwest Horticultural Council (NHC) states: "Liquid foliar application that increases trees' ability to absorb nutrients, thus promoting plant health and increasing the quality of produce."

d. Organic Produce Wholesalers Coalition (OPWC) states: "OPWC supports relisting this material based on comments from our sector that indicate their current use of humic acids to improve the water holding capacity of the soil, to increase nutrient uptake by crops, and to stimulate soil biology. Growers noted that use of humic acids is particularly important in arid, sandy soils where there are many uses and applications."

e. Organic Trade Association (OTA) states: "OTA's outreach to producers through our sunset survey system and through direct communication with membership corroborates what NOSB has already heard, that humic acids remain necessary for organic crop production."

f. California Certified Organic Farmers (CCOF) states: "442 OSPs. CCOF, the NOP, and many CCOF growers have been heavily involved in an effort to gain international acceptance of humic acids."

g. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Common fertilizer ingredient."

h. Ohio Ecological Food and Farm Association (OEFFA) states: "OEFFA producers utilize mostly non-synthetic humates. We are not sure why this is, or why it seems that alkali-extracted humic acids seem to have fallen out of favor, but it signals a lack of necessity for these products among OEFFA producers. If humic acids should be disallowed, OEFFA would require significant lead time in order to re-review all of the products which may contain these ingredients, as we have not been tracking them since the critical variance regarding alkali-extracted humic acids was dropped."

Hydrated Lime

As an external pest control

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3_a		
Public Interest Groups	BP_b		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			OTA
Certifiers/MROs			

Notes:

a. A mushroom grower states: "Should we fail to prevent an outbreak of weed molds, this is used as a paste to apply to individual patches of disease. It is also used as a pH adjuster in casing soil along with buffers like lime and gypsum to make the casing soil inhospitable to fungal diseases and perfectly suited to the mushrooms we want to grow."

b. Beyond Pesticides (BP) states: "Although the annotation limiting the use of hydrated lime to disease control eliminates objectionable use as a soil additive, correcting the annotation to read, 'as a part of Bordeaux mix' would be more consistent with the recommendation of the NOSB."

Hydrogen Peroxide

As algicide, disinfectants, and sanitizer, including irrigation system cleaning

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4_a		
Public Interest Groups	BP_b		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC_c, IOIA		$OMRI_e$, OTA
Certifiers/MROs	$CCOF_d$		$MOSA_f$

Notes:

a. A farmer states: "This is probably the single most important substance on the list for us in terms of disease control."
b. Beyond Pesticides (BP) states: "Although concentrated hydrogen peroxide is a powerful oxidizer, the advantage of hydrogen peroxide is its nontoxic residue."
c. Northwest Horticultural Council (NHC) states: "Hydrogen peroxide has dual use within organic farming: firstly, as a pesticide with low environmental impact; secondly, as a disinfectant/sanitizer for irrigation systems. This product is used by 100% of organic tree fruit growers."
d. California Certified Organic Farmers (CCOF) states: "(170 OSPs): Hydrogen peroxide is commonly used as both an irrigation cleaner and for plant disease control. Organic growers, working with researchers and crop pest professionals, will likely try many fire blight controls including hydrogen peroxide; however, the degree to which it will be used is not yet known. The efficacy of alternatives or ability to control fire blight in organic systems is a long-term process that will not be resolved until several seasons and weather patterns are experienced."
e. Organic Materials Research Institute (OMRI) states: "Please confirm the allowance of inert substances used in combination with hydrogen peroxide products. Note that the Technical Report also indicates that formulations are often proprietary, and it is not always possible to know the identity of formulants."
f. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "This is a very common general purpose sanitizer."

Insecticidal Soaps

As insecticides for soft-bodied insects

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	5		
Public Interest Groups	Cornucopia[a]		BP[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[c], JPA Neudorff IOIA		OTA
Certifiers/MROs	CCOF[d]		MOSA[e]

Notes:

a. The Cornucopia Institute states: "Insecticidal soaps are used by many farmers in organic agriculture to control soft-bodied pest insects when natural management techniques fail."
b. Beyond Pesticides (BP) states: "Once again, the CS did not report the comments against relisting (ours). The listing for insecticidal soaps should be annotated in a way that protects non-target arthropods from harm. If this is not possible, insecticidal soaps should be delisted. We suggest this annotation: 'Must not be used when predators, parasitoids, or pollinators are present.'"
c. Northwest Horticultural Council (NHC) states: "Insecticidal soaps are generally used in place of harsher organic pesticides, such as permethrin, thus securing a prime place in the organic farmers' toolkit. These soaps are used by approximately 50% of organic tree fruit growers."
d. California Certified Organic Farmers (CCOF) states: "(341 OSPs): These are widely used as 'soft' pesticides in organic crop production. These materials have no residual activity, which minimizes their impact on beneficial insects including honey bees (UC IPM 2015b). They are used responsibly in organic Crops: 3 farming operations and continue to be safe and effective alternatives to toxic materials."
e. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Safer Brand Soaps comes to mind and we see that they are widely used."

Lignin Sulfonate

For use as plant or soil amendments; chelating agent, dust suppressant

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups		BP[a] Cornucopia[b]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC[c]		OTA
Certifiers/MROs			CCOF[d]

Notes:

a. Beyond Pesticides (BP) states: "Lignin sulfonate is a synthetic material that is used in place of sound organic practices such as creation of hedgerows/windbreaks, mulching, vegetative cover, and building organic soil through the introduction of compost."
b. The Cornucopia Institute states: "Safer organic soil management practices can be implemented that do not raise the environmental concerns surrounding the contamination of waterways and the paper industry."
c. Organic Produce Wholesalers Coalition (OPWC) states: "We agree with the Crops Subcommittee's vote to retain lignin sulfonate on the list at §205.601.j as a chelation agent and for dust suppression."
d. California Certified Organic Farmers (CCOF) states: "(68 OSPs): Members who use lignin sulfonate primarily apply it as a dust suppressant, which helps prevent mite infestations in crops (BorrePlex and Phyto-Plus Brand Plant Stimulator).
e. A mushroom grower states: "Healthy mushroom cultures come from highly selective mushroom substrates."

Lime Sulfur

As insecticides and plant disease control

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 1 No: 4 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4		
Public Interest Groups			BP[a] Cornucopia[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA Granatstein		OTA
Certifiers/MROs	CCOF[c] VOF[d]		

Notes:

a. Beyond Pesticides (BP) states: "The Crops Subcommittee must investigate the particular uses of lime sulfur in plant disease control to determine whether they are necessary, and whether lime sulfur can be used for the purpose without disrupting natural controls. If it can, the listing should be annotated, 'For use only when beneficial arthropods are not present.'"
b. The Cornucopia Institute states: "We recommend an annotation stating: use needs to document multiple alternative attempts to control target. We recommend proposing annotations for specific uses."
c. California Certified Organic Farmers (CCOF) states: "(272 OSPs). This material can be used effectively with other materials for fire blight control/management, so removal at this point would be inappropriate."
d. Vermont Organic Farmers (VOF) states: "Although alternatives have been looked into including neem oil, potassium bicarbonate and Bacillus subtilis, research has shown that these materials do not offer the same effectiveness as the standard lime sulfur/sulfur fungicide program in organic apple production in Vermont."

Liquid Fish Products

Fertilizer and foliar feed

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee: Crops Subcommittee emphasized the importance of sustainable harvest of fisheries.
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4		
Public Interest Groups	Cornucopia[a]	BP[b]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC, IOIA		OTA
Certifiers/MROs			MOSA[c]

Notes:

a. The Cornucopia Institute states: "The NOSB should solicit input on the current source of fish material used in organic production to determine if sustainable sources are available and should set limits on the amount of heavy metals allowed to be present in the final product."
b. Beyond Pesticides (BP) states: "Liquid fish products should be removed from the National List because they remove valuable nutrients from marine or aquatic ecosystems and are incompatible with organic production. It is concerning that so many growers seem to rely on this synthetic material for routine fertility."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very commonly used."

Magnesium Sulfate

Used as a soil amendment in magnesium deficient soils when deficiency is documented

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee: The Crops Subcommittee asked: Is non-synthetic magnesium sulfate available in the marketplace? Public comment indicated that the only form of non-synthetic magnesium sulfate that has been reviewed is potassium magnesium sulfate or langbeinite. However, this material is not a reliable alternative because it is only available in limited quantities and it is impossible to determine upon purchase whether or not langbeinite is synthetic or non-synthetic.
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			OTA
Certifiers/MROs			MOSA[b]

Notes:

a. Beyond Pesticides (BP) states: "Synthetic plant nutrients should not be taking the place of organic soil-building practices."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Epsom salts are very commonly used particularly by produce growers."

Microcrystalline Cheesewax

Used to seal the plug or sawdust spawn to inoculate logs for growing mushrooms

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 1 No: 2 Abstain: 2 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3		
Public Interest Groups	BP[a]		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA	OPWC[b]	
Certifiers			MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "Until soy wax or other non-petroleum-based wax is available to allow organic producers of mushrooms on logs to choose a more environmentally-friendly alternative, microcrystalline cheesewax should remain on the National List."
b. Organic Produce Wholesalers Coalition (OPWC) states: "OPWC members surveyed their mushroom producers and found that none used microcrystalline cheesewax when growing shitaki mushrooms."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We certify growers using cheesewax in their organic mushroom production."

Micronutrients

For use as plant or soil amendments—not to be used as a defoliant, herbicide, or desiccant. Those made from nitrates or chlorides are not allowed. Soil deficiency must be documented by testing. (i) Soluble boron products. (ii) Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens	4, Green Field Farm[a]	1	
Public Interest Groups		BP	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[b]		OTA
Certifiers	OEFFA[c]		CCOF[d]

Notes:

a. Green Field Farms, a farmer owned co-op states: "Having worked with a wide range of soil types from different areas of the United States, we continue to see insufficient amounts of micronutrients in the soil for excellent plant health. Some examples: Copper deficiency - lodging in small grains Manganese deficiency - chlorotic foliage in potatoes Boron deficiency - hollow stemmed broccoli, hollow hearts in potatoes, and skin cracking in cucumbers Zinc deficiency - low test weight in grains. We think applications of synthetic micronutrients is most appropriate for increasing soil levels along with other management practices like cover-cropping, crop rotation, adjusting soil PH, and not working wet soils for optimal organic farm ecology. Another example is when we have seen adequate levels of phosphorus in the soil although the plants were showing a deficiency and until the zinc levels were increased the phosphorus was not taken up by the plant. Having these points in mind we suggest the organic farmer still needs to demonstrate a verifiable need in order to avoid over-application and potential toxicity."
b. Northwest Horticultural Council (NHC): "Boron deficiency is common in tree fruit grown in the arid areas of the Pacific Northwest, playing a key role in promoting fruit set."
c. Ohio Ecological Food and Farm Association (OEFFA) states: "We support relisting the material and modifying its annotation as follows: 'A verifiable need must be demonstrated.'"
d. California Certified Organic Farmers (CCOF) states: "801 OSPs."

Newspaper and Other Recycled Paper

As a mulch, without glossy or colored ink

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3		
Public Interest Groups			BP_a, $Cornucopia_b$
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	JPA, IOIA		$OMRI_d$, OTA
Certifiers/MROs	$CCOF_c$		$MOSA_e$

Notes:

a. Beyond Pesticides (BP) states: "A Technical Review, not requested by the CS, is needed to address changes in technology that have occurred since the original listing of newspaper or other recycled paper."
b. The Cornucopia Institute states: "There has been an increase in the use of colored graphics and images in newspapers since the last Technical Review was prepared."
c. California Certified Organic Farmers (CCOF) states: "It is used as a feedstock in commercial composts, and it is used in the manufacture of the commercial weed mat product WeedGuardPlus."
d. Organic Materials Research Institute (OMRI) states: "Technical information that addresses the advances in paper production and use of inks should be included in subsequent NOSB reviews of these materials.
e. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Widely used."

Pheromones

Used for insect control

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	5		
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[b], JPA IOIA Granatstein		OTA
Certifiers/MROs	CCOF[c]		

Notes:

a. Beyond Pesticides (BP) states: "We support the following listing, which we believe captures the sense of the conditions for exempting pheromone products from regulation: §205.601(f) as insect management. Pheromones, provided that they are identical to or substantially similar to natural pheromones as defined in 40 CFR 152.25(b), in passive dispensers, without added toxicants, and with only approved inert ingredients."

b. Northwest Horticultural Council (NHC) states: "It is estimated that pheromones are used by 100% of organic tree fruit growers. Loss of the ability to use pheromones for monitoring and control of the key pest, coddling moth (a direct fruit pest), would likely mean that many organic growers could not continue to produce apples and pears organically without suffering massive losses."

c. California Certified Organic Farmers (CCOF) states: "(450 OSPs): Pheromone use has increased as various formulations have been developed for specific target species. Commonly used formulations are various Checkmate and ISOMATE products. These materials are often the best choice for organic growers dealing with invasive species."

Plastic Mulch and Covers

Used for weed control

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	6		
Public Interest Groups			BP_a
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	$IOIA_b$, NHC_c WDA		OTA
Certifiers/MROs	$OEFFA_d$, $CCOF_e$		$MOSA_f$

Notes:

a. Beyond Pesticides (BP) states: "The NOSB should modify the listing for plastic mulch to limit its use to those cases in which organic mulches or cover crops cannot perform the necessary function."
b. International Organic Inspectors Association (IOIA) states: "These are used by many, many producer growers, especially. Mulch allows growers to extend geographic production, better control weeds, and conserve water."
c. Northwest Horticultural Council (NHC) states: "Trace amounts of potentially toxic monomers that could be released into the environment are highly unlikely."
d. Ohio Ecological Food and Farm Association (OEFFA) states: "Even with the need to pull the mulch up at the end of the season and haul it to a recycling facility, the use of plastic mulch is an effective means of suppressing weeds and saves producers significant labor hours in weed management."
e. California Certified Organic Farmers (CCOF) states: "Many types of growers use plastic mulch because biodegradable mulches that provide equivalent performance have not yet been developed. Despite recent approvals by the NOSB and NOP of Bio-based mulches, no viable alternatives exist."
f. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Widely used."

Potassium Bicarbonate

For plant disease control

Sunset 2017: To be voted on at the fall 2015 meeting.

Vote in Subcommittee: The Subcommittee asked about natural substances or products that may take the place of this material and alternative practices that would make the use of potassium bicarbonate unnecessary.

Crops Subcommittee vote to remove:
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	1		
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[b], IOIA		OTA
Certifiers/MROs	CCOF[c]		

Notes:

a. Beyond Pesticides (BP) states: "Potassium bicarbonate should be removed because it does not fit into any of the categories of allowable synthetics in §6517(c)(1)(B)(i) of OFPA."
b. Northwest Horticultural Council (NHC) states: "An invaluable tool used by organic tree fruit growers to fight apple scab and powdery mildew. 100% of regional organic tree fruit growers use this amendment."
c. California Certified Organic Farmers (CCOF) states: "(396 OSPs): This material is a safe and non-toxic alternative to fungicides, similar to baking soda. It is significantly better for soil than baking soda, which causes soil crusting. CCOF has worked hard to gain the acceptance of this material for use internationally with both the European Union (EU) and Japan."

Soaps: Ammonium

As a large animal repellent only, no contact with soil or edible portion of crop

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a]	Cornucopia[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[c]		
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Evidently, the CS missed our comments and the comments of the Cornucopia Institute, which although it remained neutral on the issue of relisting did present reasons that the NOSB might not want to relist ammonium soaps. Ammonium soaps should be allowed to sunset because they do not meet the criteria for listing on the National List."
b. The Cornucopia Institute states: "Fencing is the best alternative, although it may be cost-prohibitive."
c. Northwest Horticultural Council (NHC) states: "A mostly non-phytotoxic solution for mites, harmful insects, algae, and moss. The use of this product is believed to be universal."

Soap-Based Algicide/Demossers

As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee: The subcommittee questions whether soap-based algicide/demossers are in use by organic producers, and if they are essential for organic production. They are considering a vote for removal.

Crops Subcommittee vote to remove
Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	1[a]		
Public Interest Groups		Cornucopia[b]	BP[c]
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC[d]		OTA
Certifiers/MROs			

Notes:

a. A farmer states: "The use of and exposure to these products on land away from bodies of water present a minimal risk to mammals, birds and insects."
b. The Cornucopia Institute states: "Natural alternative methods of control of algae and moss include power-washing, the use of filters, or providing proper drainage."
c. Beyond Pesticides (BP) states: "Soap-based algicides and demossers must not be allowed for application to water. Beyond Pesticides would support the CS proposal to delist them. Alternatively, we would support an annotation, 'Not to be applied to water.'"
d. Organic Produce Wholesalers Coalition (OPWC) states: "Growers need multiple options for cleaning irrigation lines because different types of bacteria, algae, and mosses build up in and around the emitters. In these times of drought we need to do all we can to encourage growers' use of drip irrigation systems."

Soap-Based Herbicides

As herbicides, weed barriers, as applicable (1) herbicides soap-based—for use in farmstead maintenance (roadways, ditches, right of ways, building perimeters) and ornamental crops

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[b], JPA IOIA[c]		
Certifiers/MROs			CCOF[d]

Notes:

a. Beyond Pesticides (BP) states: "Again, the CS states, 'There were no comments in favor of removing soap-based herbicides,' in spite of the comments we submitted and the comments by Westbridge suggesting an alternative."
b. Northwest Horticultural Council (NHC) states: "100% of regional organic tree fruit growers use these types of fatty-acid-based products."
c. International Organic Inspectors Association (IOIA) states: "[Soap-based herbicides] are often used in non-crop areas as a contact herbicide to prevent weed seed set."
d. California Certified Organic Farmers (CCOF) states: "46 OSPs: Continued listing of these materials for roads and ornamentals encourages full integration of the grounds, roadsides, and farmstead into organic certification rather than excluding such areas in order to retain the option to use prohibited herbicides for weed control there. CCOF does not support their use in organic field crop production."

Sodium Silicate

Used to adjust the specific gravity in flotation tanks for tree fruit; fiber processing

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove
Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups		BP[a]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			OPWC[b], OTA[c]
Certifiers			

Notes:

a. Beyond Pesticides (BP) states: "The Crops Subcommittee did not provide information concerning the use of sodium silicate in fiber processing. Without support for that use, it should also be delisted."

b. Organic Produce Wholesalers Coalition (OPWC) states: "Similar to lignin sulfonate, sodium silicate is listed for use as a flotation agent at §205.601.L.1. This material is a flotation agent that does not seem to be used in the organic trade any more. For this reason, OPWC supports removing the portion of the material's annotation related to its use as a flotation agent.
We have not researched its use for fiber processing (§205.601.L.2) so we recommend that sodium silicate be retained on the National List with an annotation that references its use in fiber processing."

c. Organic Trade Association (OTA) states: "Removing sodium silicate at this time would eliminate the possibility of these smaller facilities, with older style packing lines, in engaging in the organic industry. OTA requests NOSB to consider potential impacts on these smaller packing facilities, should both pear float materials currently listed on §205.601 be removed and no longer allowed in organic fruit handling."

Sticky Traps/Barriers

Used for insect control

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee: Crops Subcommittee asked: 1. Can/should the wide range of products covered by this listing be categorized by use and materials? 2. Are some uses of sticky traps incompatible with organic production?

Crops Subcommittee vote to remove:
Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4		
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC_b, JPA, IOIA, Granatstein		OTA
Certifiers/MROs			$CCOF_c$, $MOSA_d$

Notes:

a. Beyond Pesticides (BP) states: "The CS should explore the possibility of an annotation that ensures the targeted use of these traps, such as 'Must be used in a way that prevents the capture of non-target animals.'"
b. Northwest Horticultural Council (NHC) states: "These traps, often paired with pheromone lures, are attractive to many harmful insects. Sticky traps are used by 95-100% of organic tree fruit growers."
c. California Certified Organic Farmers (CCOF) states: "Sticky traps are an important tool to create economic thresholds for insecticide applications, to monitor for invasive insects (often required by the state of California), and can also be used to monitor for the presence of beneficial insects so that the use of insecticide can be avoided altogether. Common formulations are Tanglefoot and yellow sticky traps. CCOF sees these materials as benign physical tools whose inclusion on the National List is inappropriate. Rather, they should simply be allowed as physical practices."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Widely used."

Sucrose Octanoate Esters

To control soft-bodied insects, such as whiteflies, aphids, and mealybugs

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove:
Yes: 0 No: 6 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups		BP[a]	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "The technical reviews provide insufficient information to evaluate SOEs relative to OFPA criteria. Considering the absence of information and absence of support for relisting, we support the delisting of SOEs."

Vitamin B_1, C, E

As plant or soil amendments

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove:
Yes: 0 No: 5 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	1		
Public Interest Groups		BP_a	
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers	IOIA		
Trade Associations / Industry Consultants			
Certifiers/MROs			$MOSA_b$

Notes:

a. Beyond Pesticides (BP) states: "The vitamins may be produced by genetically engineered organisms, and the technical review finds them ineffective for the purposes for which they are used, listing alternative substances for vitamin B_1 and alternative practices for all three."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Rarely used individually but are included as an ingredient in some of the products we see for fertility."

Vitamin D_3

As rodent control, in a bait station above ground; below ground it may be used loose

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Crops Subcommittee vote to remove:
Yes: 0 No: 6 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3		
Public Interest Groups		BP Cornucopia[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers	IOIA		
Trade Associations / Industry Consultants	NHC[b]		OTA
Certifiers/MROs			MOSA[c]

Notes:

a. The Cornucopia Institute states: "Vitamin D_3 is toxic to non-target organisms. Trapping is a safer, effective alternative that meets OFPA criteria."
b. Northwest Horticultural Council (NHC) states: "Useful in both disease control for plants as well as a slug/snail bait. Lessens the need to use harsher substances, such as permethrin, in order to protect crops. Approximately 85% of relevant growers use this amendment."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Widely used."

LIVESTOCK PROPOSALS

Annotation Change for Lidocaine and Procaine

Local anesthetics

Petitioned/Vote in Subcommittee Document: July 31, 2015
Annotation change for withdrawal times for these

REQUEST FOR PUBLIC COMMENT
1. Is Lidocaine widely used; under what circumstances is it used; how is it administered; should the withholding period be the same in all animal species?
2. Is Procaine used; under what circumstances; how is it administered; should the withholding period be the same in all animal species?
3. Should the annotation for Lidocaine at §205.603(b) be amended as follows?
Lidocaine—as a local anesthetic. Use requires a withdrawal period of 90 days 8 days after administering to livestock intended for slaughter and 7 days after administering to dairy animals
4. Should the annotation for Procaine at §205.603(b) be amended as follows?
Procaine—as a local anesthetic, use requires a withdrawal period of 90 days 8 days after administering to livestock intended for slaughter and 7 days after administering to dairy animals.

Motion and Subcommittee Vote:
To change annotations for lidocaine and procaine on §205.603
Yes: 4 No: 0 Abstain: 0 Absent: 2 Recuse: 0

	Support Annotation Change	Oppose Annotation Change	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	NOC[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	CROPP IOIA[b]		
Certifiers			

Notes:
a. National Organic Coalition (NOC) comments: "Lidocaine is rapidly metabolized after absorption, with half-lives of 0.6 to 1 hour in most species. To satisfy the Animal Medicinal Drug Use Clarification Act (AMDUCA) requirement that an extended withdrawal interval (WDI) be used after extra label use of drugs, Food Animal Residue Avoidance Databank (FARAD) recommends that a 24-hour milk and meat WDI when lidocaine (with or without epinephrine) is used for local anesthesia in food animals. NOC supports the relisting of procaine and the reduction of the withdrawal time."
b. International Organic Inspectors Association (IOIA) states: "It is our position that [the annotation change] represent[s] an improved, sound, and sensible approach to implementing the organic regulations."

Annotation Change for Parasiticides

Petitioned: August 18, 2015

Vote in Subcommittee:
Motion to accept the Vote in Subcommittee document on annotation changes for parasiticides
Yes: 6 No: 0 Abstain: 0 Absent: 0 Recuse: 0

	Support Annotation Change	Oppose Annotation Change	Neutral/ Seeks Clarification
Farmers / Citizens	1	1	
Public Interest Groups			
Food Processors / Handlers	AOD_a		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	NOC_b $CROPP_c$		
Certifiers	CCOF		

Notes:

a. Aurora Organic Dairy (AOD) states: "AOD agrees with the Livestock Subcommittee recommendation for a separate proposed action to reduce the 90-day milk withdrawal period for Fenbendazole, and requests that Moxidectin be included within this proposed action. AOD disagrees with the withdrawal intervals for these substances."

b. National Organic Coalition (NOC) comments: "NOC recommends the following changes in bold and strikethrough:
   - Fenbenzadole (CAS #43210-67-9) – ~~**only for use by or on the lawful written order of a licensed veterinarian.**~~
   - ~~**Ivermectin (CAS #70288-86-7)**~~. **Remove Ivermectin**
   - Moxidectin (CAS #113507-06-5) – ~~for control of internal parasites only.~~

   Neither fenbendazole nor moxidectin have withdrawal times for their use in lactating dairy cows. While many sources recommend no withdrawal time, NOC feels that 5 days is precautionary and an indication that the use of parasiticides is only an emergency measure."

c. Guy Jordowski, DVM with Organic Valley, CROPP, states: "The milk withholding time should be reduced for organic dairy cattle from 90 days to 14 days for both Moxidectin and Fenbendazole, as use of these drugs in conventional dairy requires no withdrawal time for milk. Ivermectin should not be used in dairy cattle – it has never been approved for use in dairy cattle. FARAD estimates the residues in milk for Ivermectin have a long half-life and recommended milk withdrawal times vary from 28 to 53 days, depending on dose and route of administration. There is a need for treatment of lungworm infections in organic dairy cattle. This seems to be a growing problem affecting more farms and cattle in recent years. In general, there is no effective organic or natural treatment for lungworms. Fenbendazole works well for treating lungworm infection in dairy cattle, but the 90-day milk withdrawal time makes its use impractical in most situations. A 14-day milk withdrawal period would make the use of Fenbendazole for this condition more practical. There is a concern of animal welfare and this issue — the use of Fenbendazole to treat lungworm infection in select individuals is likely to decrease animal suffering in dairy cows with lungworm infections."

d. Kent Henderson states: "In 2012, evidence was presented to NOSB to support use of Fenbendazole (FBZ) in organic dairy and beef cattle and small ruminants and to reduce the restrictive milk and meat withholding times. Immune pathways were explained that showed how parasitism compromises the immune system's ability to respond to vaccines, which are vital to preserving the health of organic animals that cannot be treated with antibiotics. The life cycle of internal parasites, the parasites interaction with pastured animals, and a strategic FBZ deworming program that reduces parasite egg and larvae infestation of pastures were described. Finally, increased milk and meat production were

demonstrated in clinical trials that will help organic cattle produce more meat and dairy products while consuming less-expensive, organic-derived feedstuffs. The goal of this presentation is to explain that: Milk withhold time should be reduced to zero days, as supported by FDA approval evidence. Meat withhold time should be reduced to 14 days. Ivomectin anti-parasitic products such as Eprinex should be removed from the approved NOSB list because of their detrimental effect on the dung beetle, and growing evidence of anthelmintic resistance."

e. Sean Mallet states: "I would suggest, though, to leave the milk withholding periods the same (90 days) for any of the parasiticides, also, if an organic dairy or beef producer uses a paraciticide, that animal can no longer be considered for organic beef."

LIVESTOCK 2017 SUNSET MATERIALS §205.603 Synthetic Substances Allowed for Use in Organic Livestock Production

Alcohols (Ethanol, Isopropanol)

Ethanol as disinfectant and sanitizer only (prohibited as a feed additive); Isopropanol as a disinfectant

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Ethanol/Isopropanol from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 0 Recuse: 0/Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC, IOIA		
Certifiers/MROs			CCOF, MOSA[b]

Notes:

a. Beyond Pesticides (BP) states: "It appears that the LS did not investigate the availability of organic and/or non-synthetic alcohols from non-GMO fermentation organisms and feedstock. Findings on this issue are necessary to support a proposal to relist, and Beyond Pesticides supports the LS proposal to relist ethanol and isopropanol if that evidence is presented."

b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Teat care appears to be the most common use we see."

Aspirin

Used to control pain, inflammation, and body temperature in livestock

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Aspirin from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	12[a]		
Public Interest Groups	BP[b]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			CCOF, MOSA[c]

Notes:

a. Josh Payne, herd manager at The Farm at Cold Brook, a certified organic dairy, states: "We encourage the subcommittee to continue listing aspirin. Aspirin is a simple drug to administer, and gives relief to livestock in emergency situations."

b. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of aspirin because of its importance in treating pain and inflammation."

c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very widely used." Comments from MOSA's farmers:
   1. "We use aspirin to occasionally treat a cow with an inflammatory condition, such as a joint injury."
   2. "We use Aspirin to reduce inflammation and pain. We need something to help our animals be comfortable as their bodies work to heal."
   3. "Aspirin is used to aid in treatment for fever or discomfort from an injury."
   4. "As a pain and fever reducer. Some producers use it for treatment of mastitis. We have not tried this, but are considering it."
   5. "Helps with pain relief, which keeps cows eating during times of injury."
   6. "We give this routinely to cows with mastitis. The swelling that often accompanies mastitis blocks the milk flow from the udder, allowing the infection to grow. Aspirin is very effective at reducing swelling, allowing the udder to clear itself of bacteria-laden milk, thus aiding the cow to heal herself. Aspirin also increases the comfort level of the cow suffering from mastitis, which is very painful. If she is experiencing less pain, she is more likely to fully let down her milk, which will aid recovery for the same reasons. There is an animal welfare issue here. I don't like to see my cows in pain. I would hate to think of organic dairy as being more painful for the cows than conventional. I like aspirin a lot, because it treats the symptoms (pain, swelling) and allows the cow to more effectively cure herself. Taking away aspirin would remove the best tool in our anti-mastitis toolbox. I think it's possible that the SSC's of the organic industry as a whole might rise as a result. Also, something like this might push me to consider retiring from farming. It is necessary to give pain relief, or relief of swelling to our cows. It would be inhumane not to."
   7. "Aspirin is occasionally used to give relief to livestock in emergency situations. It is effective and simple to administer and provides humane relief to livestock."
   8. "Not sure what else would easily take its place. Flunixin is currently allowed, but we very seldom use it and would need to get it from a vet. I believe its administration route is intravenous, which we would prefer not to have to do vs. giving aspirin orally. Also, Flunixin requires a hold-out period;

whereas, aspirin doesn't. Perhaps we could give white willow bark, but don't know its efficacy or dosage. There are some alternatives, but seem to be harder to source. None that I am aware of that are currently listed."

9. "Aspirin is widely available and relatively safe and easy to dose. One advantage is it that can be administered orally (does not need to be injected). We find that our animals generally respond well to it."
10. "There are other pain relief items out there, but aspirin is more effective. The only thing I can think of is banamine. I've got to think aspirin is a better alternative."

Atropine

Used to dilate the eye, reduce eye spasms, and reduce pain from eye surgery or disease

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Atropine from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups	BP[a]		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of atropine due to its essentiality as an antidote for organophosphate poisoning and usefulness as an antispasmodic. The TR describes it as a benign treatment, without a holistic or natural alternative. The withdrawal periods of 56 days and 12 days are twice the listed FARAD Withdrawal Interval (WDI)."

Biologics: Vaccines

Purpose?

For use as disinfectants, sanitizer, and medical treatments as applicable

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Vaccines from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA LVC[b]		
Certifiers/MROs			MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of vaccines as listed, noting that no vaccines, based on genetically engineered organisms, have been or should be approved."
b. Lander Vet Clinic (LVC) states: "Biologics help prevent and/or significantly reduce the incidence of both clinical and subclinical disease in a herd, and are an especially vital component of the health program in herds that are unable to use antibiotics or hormones."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Extremely commonly used – we allow vaccines."

Butorphanol

Analgesic and sedative

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Butorphanol from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			BP_a
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "…we asked that the LS do two things with respect to butorphanol: 1. Find and present information about impacts of butorphanol and its metabolites when excreted; and 2. Get a determination from FDA regarding the legal use of butorphanol in food animals… Beyond Pesticides does not oppose the relisting of butorphanol. However, since the public expects that organic production requirements are more stringent than FDA's, and reliance on AMDUCA's exemption of ELUs can be problematic, we encourage the LS to address AMDUCA and ELUs in a discussion document that proposes policy to clarify the allowance of animal drugs for food animals as extra-label uses under AMDUCA."

Chlorhexidine

Used in surgical procedures conducted by a veterinarian and for use as a teat dip when alternative germicidal agents and/or physical barriers have lost their effectiveness

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Chlorhexidine from §205.603(a)
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3		
Public Interest Groups			BP[a]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	LVC[b], IOIA[c]		
Certifiers/MROs			CCOF, MOSA[d]

Notes:

a. Beyond Pesticides (BP) states: "Organic producers should not be countering resistance to medications (or pesticides) through introduction of another toxic chemical, particularly one that depends on chlorine chemistry. Beyond Pesticides does not object to the use of chlorhexidine 'for surgical procedures conducted by a veterinarian.' However, the annotation, 'Allowed for use as a teat dip when alternative germicidal agents and/or physical barriers have lost their effectiveness' should be removed. If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

b. Lander Vet Clinic (LVC) states: "Topical disinfectants like chlorhexidine and iodine are essential for teat disinfectants, and to control the spread of infection and reduce the occurrence of mastitis in organic livestock."

c. International Organic Inspectors Association (IOIA) states: "Commonly used on organic farms as a teat dip. The current annotation for this material adequately insures that it won't be over used or abused."

d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Used under restriction, particularly in freezing temperatures where teats freezing may occur or when SCC is very high."

Chlorine Materials: Calcium hypochlorite, Chlorine dioxide, Sodium hypochlorite

Disinfectants

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Chlorine Materials from §205.603
Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		1 [e]	
Farmers	2 [a]		
Public Interest Groups			BP [b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	GEA WS West [c]		
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC, OPWC, IOIA		OTA
Certifiers/MROs			MOSA [d]

Notes:

a. Organic dairy farmer Josh Payne states: "These products are critical to the basic sanitation of dairy equipment, and to the basic health of humans and livestock."

b. Beyond Pesticides (BP) states: "The subcommittees must take into consideration the widespread impacts of chlorine manufacture, use, and disposal. They should try, once more, to clarify limitations on the use of chlorine. We recommend that all three listings for 'chlorine materials' be replaced with the following language: Chlorine materials, only as present as residual chlorine levels in water delivered by municipal or other public water systems, which shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act. Shall not be used in higher concentrations in direct contact with food, crops, or cropland. (i) Calcium hypochlorite. (ii) Chlorine dioxide. (iii) Sodium hypochlorite. If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016. Alternatives to chlorine are available, and to the extent that the NOSB believes that disinfection is necessary, it should commission a technical review to investigate alternatives and recommend that NOP guidance promote those alternatives."

c. GEA WS West states: "Clean equipment in dairy operations not only prevents buildup of substances harmful to the equipment, but also acts to clean, sanitize, and disinfect surfaces that milk-producing animals come into contact with on a daily basis. Chlorine materials are used by our company to control bacteria, fungi, and algae and act to sanitize equipment and work surfaces in order to prevent the spread of disease."

d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very commonly used for equipment cleaning and sanitation."

e. A citizen, Margaret Goodman, states: "I urge you to make organic as chlorine free as possible. Chlorine is hazardous in its production, transportation, storage, use, and disposal. EPA's Design for the Environment has identified safer viable alternatives for some or all uses, including other materials on the National List. It is time for the NOSB to update its thinking and approach to cleaners and disinfectants."

Copper Sulfate

Antimicrobial agent for use in livestock footbaths

Sunset 2017: To be voted on at the fall 2015 meeting.

Vote in Subcommittee:
Motion to remove Copper Sulfate from §205.603:
Yes: 1 No: 5 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3[a]		
Public Interest Groups			BP[b]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs	VOF		CCOF, MOSA[c]

Notes:

a. Organic dairy farmer Josiah Miller states: "Copper sulfate and hydrated lime are a very effective and humane way to treat fungus problems in feet."
b. Beyond Pesticides (BP) states: "We suggest an annotation, 'Substance must be used and disposed of in a manner that minimizes accumulation of copper in the soil, as shown by routine soil testing.' This is comparable to the annotation for copper sulfate in crops. If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very common hoof treatment. Zinc sulfate is an alternative that's frequently requested."

Electrolytes

For correcting metabolic imbalances in livestock due to dehydration

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Electrolytes from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA[b] LVC[c]		
Certifiers/MROs			MOSA[d]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of electrolytes in order to provide support to the animals in times of illness."
b. International Organic Inspectors Association (IOIA) states: "This is an essential tool in treating both young and adult animals that would otherwise be treated with a prohibited material and lost from the organic herd or flock. There is no alternative."
c. Lander Vet Clinic (LVC) states: "Electrolytes are an important component of treatment for dehydration and electrolyte imbalances."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very commonly used for dire medical situations. We request clarity on single ingredients allowed. Example – sodium lactate; calcium gluconate; calcium propionate, glycine, etc."

Excipients

Substances that serve as the vehicle or medium for a drug or other active substance, including colorants, flavor enhancers

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			CCOF, $MOSA_b$

Notes:

a. Beyond Pesticides (BP) states: "The LS review of public comment simply says, 'Public Comment supports continued Listing.' The reviewer clearly missed our comments, as well as those from CCOF pointing out problems with the annotation. The LS should make a commitment to identify and review the excipients used in organic production. A process for doing so is laid out in two NOSB recommendations on 'inert' ingredients from April 2010 and October 2012. Meanwhile, we recommend that the NOSB place an expiration date on the listing for excipients to ensure that the NOP feels an urgency to assist with the project. If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Especially important in teat dips and health care products. We feel clear, but recognize that there is some lack of clarity with defining 'drug'. We also request recognition of specific lists where materials must be listed."

Flunixin

Used to treat pain, inflammation and fever—stronger than aspirin

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Flunixin from §205.603(a)
Yes: 0 No: 4 Abstain: 1 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	LVC_b		
Certifiers/MROs			CCOF, $MOSA_c$

Notes:

a. Beyond Pesticides (BP) states: **"**A TAP review was produced in 2007. The decision of the NOSB during the sunset review of 2010 does not reference the TAP review. All three TAP reviewers in 2007 opposed the listing of flunixin… Although [the TAP reviewers'] reasons for not listing flunixin are not new, they have not been considered by the LS during the current review or the previous review. Any proposal for relisting flunixin should address these issues. Therefore, Beyond Pesticides suggests sending this proposal back to the LS for reconsideration."

b. Lander Vet Clinic (LVC) states: "Flunixin meglumine is an effective non-steroidal anti-inflammatory that reduces pain and fever. Flunixin provides greater potency and efficacy compared to aspirin, leading to a more rapid and profound response from life-threatening diseases, such as acute coliform mastitis and bovine respiratory disease. The ultimate objective is to save lives, reduce animal suffering and improve the animal's chances of survival."

c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Not very common, but in use on some farms."

Formic Acid

Use as a pesticide solely within honeybee hives

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Formic Acid from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups	BP[a]		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: **"**We are happy to see that the LS proposal was able to incorporate some input from a beekeeper, in addition to the information in the TR. Beyond Pesticides supports the relisting of formic acid as an aid to protecting honey bees from parasitic mites. Although it is a synthetic that poses some hazard to beekeepers, varroa and tracheal mites are a contributing factor to honey bee declines that threaten many agricultural crops."

Furosemide

Reduces edema (swelling/fluid build-up) in cattle

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Furosemide from §205.603(a)
Yes: 5 No: 1 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups		BP[a]	
Food Processors / Handlers		AOD	
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	WODPA[b]		
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the LS proposal to delist furosemide because it is unnecessary."

b. WODPA recommends continued listing, stating: "Furosemide is used for the treatment of physiological parturient edema of the mammary gland and associated structures. It is a diuretic-saluretic for prompt relief of edema. This product is important to the humane treatment of organic animals. WODPA producers, responding to our survey, report that they do not use Furosemide. Even so, we support retaining this drug until other producers who do use it have suitable/viable replacements. This product is important to the humane treatment of organic animals. Its primary use is in lactating dairy cows to treat udder edema. These symptoms apparently can be treated in a number of ways holistically, i.e., through herbal/essential oils, although there is nothing in the literature to support alternative treatments at this time. Accordingly, we disagree with removing this material from the list solely on the grounds that very few comments were received. This material must remain on the National List as an approved substance until such time as we have research demonstrating the efficacy of natural alternatives."

Glucose

A simple sugar used in electrolyte solutions to accelerate absorption of solutes (electrolytes)

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Glucose from §205.603(a)
Yes: 0 No: 6 Abstain: Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3		
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			MOSA[b]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of glucose because of its importance in treating certain conditions."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Commonly used electrolyte ingredient."

Glycerin

Byproduct of biodiesel production, allowed as a livestock teat dip in §205.603(a)(12), but conventionally used as a feedstock and oral supplement

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Glycerin from §205.603(a)
Yes: 0 No: 5 Abstain: 1 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	1		
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			MOSA[b]

Notes:

a. Beyond Pesticides (BP) states: "We suggest that glycerin be relisted on §205.603, that the Materials Subcommittee give more attention to the classification and acceptability of materials made by fermentation, and that the use as an oral supplement to follow-up dextrose/glucose IV for ketosis be petitioned and examined by the NOSB."
b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very common."

Hydrated Lime

As an external pest control in livestock, not permitted to cauterize physical alterations or deodorize animal wastes

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Hydrated Lime from §205.603(b)
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	3[a]		
Public Interest Groups			BP[c]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	NHC[b], IOIA		
Certifiers/MROs			CCOF[d]

Notes:

a. Organic dairy farmer Josiah Miller states: "Copper sulfate and hydrated lime are a very effective and humane ways to treat fungus problems in feet. We also use hydrated lime to disinfect and raise pH in calf pens to help prevent harmful bugs from growing."
b. Northwest Horticultural Council (NHC) states: "Combination of burnt lime with water. An important organic fungicide used to control mildew. Can also be employed as a soil amendment, either to alter the soil pH, or as a fertilizer. It is used by 100% of organic tree fruit growers in the region."
c. Beyond Pesticides (BP) states: "Beyond Pesticides supports the use of hydrated lime when it can replace more toxic inputs. If, as indicated in Dr. Karreman's comments, the use of hydrated lime as a walk-through can reduce the use of copper sulfate for that purpose, then that use should be encouraged. On the other hand, the use upon which WODPA bases its support does not appear to be allowed by the annotation."
d. California Certified Organic Farmers (CCOF) states: "(77 OSPs): The product most commonly used is Western Hydrated Lime, high calcium."

Hydrogen Peroxide

Disinfectant and broad-spectrum germicide used for medical treatment

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Hydrogen peroxide from §205.603(a)
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		2[a]	
Farmers	6[b]		
Public Interest Groups	BP[c]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	BioSafe Systems[d]		
Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC IOIA[e]		
Certifiers/MROs			MOSA[f], CCOF[g]

Notes:

a. Citizens Margaret Goodman and Elizabeth Cook state: "When you review needs for sanitizers, you should ask whether concentrated hydrogen peroxide is needed. Hydrogen peroxide is relatively non-toxic in low concentrations, though it is a powerful oxidizer and may damage soil biota. Repeated exposure to vapor is harmful."

b. Organic dairy farmer Josh Payne states: "We support the continued listing of hydrogen peroxide as it is readily available and is effective in cleaning and treating wounds and hoof-related conditions."

c. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of hydrogen peroxide as a safer alternative to chlorine-based and other toxic sanitizers."

d. BioSafe Systems, LLC states: "While Hydrogen Peroxide may occur alone as a formulated product, Peroxyacetic acid (PAA) solutions typically exist together with hydrogen peroxide and acetic acid in an aqueous solution. These solutions rapidly degrade into acetic acid, oxygen, and water, none of which are of toxicological concern. As such, there are no residues. Hydrogen Peroxide and PAA are effective no-residue sanitizers for use on food contact surfaces, food handling, dairy processing equipment and vessels, against a large number of gram negative and gram positive bacteria, fungi, and many human health pathogens. Proper sanitation of farms and processing facilities are critical to ensure the protection of public health from food-borne pathogens. Hydrogen Peroxide and PAA are used in livestock facilities to clean stalls and equipment, and are effective disinfectants against many organisms, including control of human and animal health pathogens on hard surfaces, equipment, and structures. Hydrogen Peroxide is also used as a medical treatment in the cleaning and treating of wounds and hoof conditions by livestock growers.

e. International Organic Inspectors Association (IOIA) states: "Commonly used as udder wash and also often for sanitizing equipment."

f. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Commonly used as a sanitizer. Common alternative teat dip and wound treatment material."

g. California Certified Organic Farmers (CCOF) states: "Most CCOF-certified livestock producers use a generic version of hydrogen peroxide as a disinfectant in livestock healthcare (primarily dairies). Soap and water-diluted iodine can be used as an alternative."

Iodine

Disinfectant and antimicrobial, especially as a teat dip used both pre-milking and post-milking

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove iodine from §205.603(a)(14) and §205.603(b)(2)
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		1[d]	
Farmers	4		
Public Interest Groups			BP[e]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	GEA WS West[a]		
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA, LVC[b]		
Certifiers/MROs	MOFGA[c]		CCOF, OEFFA[f], MOSA[g]

Notes:

a. GEA WS West states: "Animal hygiene is a primary focus of our business, and udder hygiene to prevent mastitis and minimize the opportunity for bacteria to infect the udder is a specific area of emphasis. The use of iodine in this process is critical as a disinfectant, sanitizer, and medical treatment. Perhaps the most useful purpose of iodine for udder hygiene is a topical treatment (i.e., teat cleanser for milk producing animals)."

b. Lander Vet Clinic (LVC) states: "Topical disinfectants like chlorhexidine and iodine are essential for teat disinfectants and to control the spread of infection and reduce the occurrence of mastitis in organic livestock.

c. Maine Organic Farmers and Gardeners Association (MOFGA) agrees with the Livestock Subcommittee that iodine is necessary for organic livestock production. We also share the subcommittee's concern about the inclusion of nonylphenol polyethylene glycols NPEs, a class of alklyphenol ethoxylates in iodine products, including teat dips. We support the proposal to remove NPEs/APEs from the list of 'inerts' allowed for use in organic production because of their toxicity in aquatic system and their endocrine disrupting effects.

d. Citizen Margaret Goodman states: "I urge you to remove iodine from the National List. Iodine is frequently formulated as iodophors - with surfactants or complexing agents. Iodophors containing nonylphenols (NPs) and nonylphenol ethoxylates (NPEs) are strong endocrine disruptors with impacts on many species, including gender changes. Organic alternatives and natural alternatives exist for some uses. The iodine listings should not permit iodophors containing APs and APEs. Since the listings cannot be annotated at sunset, iodine should be removed from the National List."

e. Beyond Pesticides (BP) states: "The iodine listings should not permit iodophors containing alkylphenols or alkylphenol ethoxylates. (APs and APEs are the general classes that include NPs and NPEs.) They should be annotated 'without alkylphenols or alkylphenol ethoxylates.' If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016."

f. Ohio Ecological Food and Farm Association (OEFFA) states: "We also share the subcommittee's concern about the inclusion of nonylphenol polyethylene glycols NPEs, a class of alklyphenol ethoxylates in iodine products, including teat dips. We support the proposal to remove NPEs from the list of excipients allowed for use in organic production because of their toxicity in aquatic systems and their endocrine disrupting effects."

g. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Extremely common in teat dips and for wound care. Not as common as a sanitizer in other ways. 115 dips (50 with declared NPEs); 60 other products (10 with declared NPEs)."

Lidocaine

Local anesthetic

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Lidocaine from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens	1		
Farmers	1		
Public Interest Groups	BP[a], NOC[b]		
Food Processors / Handlers	AOD[c] CROPP[d]		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	OTA, IOIA NODPA[e]		Dr. Jorkowski, DVM[f]
Certifiers/MROs			MOSA[g]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of lidocaine and the reexamination of the withdrawal period."
b. National Organic Coalition (NOC): "NOC supports the relisting of Lidocaine and the reduction of the withdrawal time. Lidocaine is very important for animal pain suppression and is a true local anesthetic. To ensure complete compliance with Section 205.238: 'Livestock healthcare standards,' farmers should be encouraged to use Lidocaine as a topical treatment."
c. Aurora Organic Dairy (AOD) states: "Milk and meat withdrawal intervals established by the NOP are excessive for organic livestock treated with local anesthetics (i.e., meat: 90 days and milk: 7 days). It is our understanding that the Livestock Subcommittee is to move forward with a Discussion Document to request further public comment on this topic. AOD supports this recommendation by the Livestock Subcommittee and proposes that the withdrawal interval for local anesthetics be established at twice the stated FDA or the FARAD recommended WDIs. This proposal is consistent with other withdrawal intervals established by the NOP for substances on the National List. Note: The FARAD lists the recommended Lidocaine WDI for cattle as follows, meat: 4 days, and milk: 72 hours. AOD therefore proposes the following Lidocaine withdrawal interval for organic cattle, meat: 8 days, and milk: 6 days."
d. CROPP Cooperative/Organic Valley States: "Lidocaine is a widely used tool for pain management, and must stay on the National list as a material crucial to good animal welfare practices."
e. Northeast Organic Dairy Producers Alliance (NODPA) states: "Lidocaine is very important for animal pain suppression, and is a true local anesthetic. To ensure complete compliance with 'Section 205.238 Livestock healthcare standards', farmers should be encouraged to use Lidocaine as a topical treatment. Lidocaine is rapidly metabolized after absorption, with half-lives of 0.6 to 1 hour in most species. To satisfy the Animal Medicinal Drug Use Clarification Act (AMDUCA) requirement that an extended withdrawal interval (WDI) be used after extra label use of drugs, Food Animal Residue Avoidance Databank (FARAD) recommends a 24-hour milk and meat WDI when lidocaine (with or without epinephrine) is used for local anesthesia in food animals. NOSB policy has been to double the withdrawal period, which would be 48 hours. Assuming the longer half-life, of 1 hour, the residue would be 3.6 x 10-15 times the original dose, far from detectable. (3.6 x 10-15 is (1/2)48).
f. Dr. Guy Jorkowski, DVM, states: "Lidocaine is not widely used, but is used regularly for pain control during disbudding/dehorning of calves on some cattle farms. It is used in adult cattle rarely – for surgical procedures (correction of displaced abomasum) or to anesthetize local areas that need surgical repair (after injury) or have sensation that is causing distress (straining in a cow that has recently given birth). These examples are representative of lidocaine use but are not a comprehensive listing. Lidocaine

availability for organic livestock is important for humane reasons. Lidocaine is usually administered by local injection to desensitize an area. It can be injected into and around nerves or simply into the area to be numbed. Lidocaine is also rarely used by injection into the epidural space for relaxing and numbing tissues in the caudal area. The withholding time suggested for cattle by FARAD should be doubled for organic use to maintain consistency with other synthetic materials. FARAD has withdrawal recommendations for cattle but no other species. A meat withdrawal time of 8 days for all species should be adequate. Lowering the slaughter withdrawal time is a good change but the dairy withdrawal should be 6 days (not 7) as the FARAD recommendation is for 72 hours (3 days) – double 3 and you get 6 – in order to keep things consistent (double conventional withhold times)."

g. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Used sometimes with alterations."

Magnesium Hydroxide

Allowed on the order of a licensed veterinarian, antacid used to alkalize the rumen and increase magnesium in the bloodstream

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Magnesium hydroxide from §205.603
Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the use as listed, which requires use by or on the lawful written order of a licensed veterinarian."

Magnesium Sulfate

Supplement for livestock on low magnesium pastures and/or high potassium pastures

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Magnesium sulfate from §205.603
Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2_a		
Public Interest Groups			BP_b
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			

Notes:

a. Organic dairy farmer, Josh Payne states: "Magnesium sulfate should continue to be listed based as its use as a mineral supplement to prevent several conditions in livestock such as 'grass staggers' or milk fever. Magnesium in this form is absorbed well by cattle, and aids in increasing the amount of magnesium in the diet of cattle. Magnesium sulfate in the form of epsom salts also can reduce inflammation in livestock."

b. Beyond Pesticides (BP) states: "Much of the information provided in the LS proposal was irrelevant, dealing with use in crops or handling. It is also difficult to determine the relevance of other parts, which may not relate to use in organic production. The LS is not clear about the availability of natural forms of magnesium sulfate, which we consider to be important information to consider in a decision to relist synthetic magnesium sulfate. Beyond Pesticides supports sending this proposal back to the LS in order to determine whether synthetic magnesium sulfate is necessary."

Methionine

As a feed additive in poultry; essential amino acid

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Methionine from §205.603
Yes: 1 No: 5 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		2[a,b]	
Farmers			
Public Interest Groups		CFS[c]	BP[d]
Food Processors / Handlers	FSEI[e]		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			MOSA[f]

Notes:

a. Citizen Margaret Goodman states: "This is to urge you to phase synthetic methionine out of organic poultry feed as the NOSB originally decided. Methionine is an amino acid that acts as a growth promoter (comparable to the synthetic growth promoter rGBH used in dairy cows). The Livestock Subcommittee (LS) proposal would increase use of synthetic methionine above currently allowed levels without any scientific support. Synthetic methionine is not necessary for animal welfare, but is needed to sustain the factory model of egg and broiler production. Neither synthetic amino acids nor synthetic growth promoters are compatible with organic practices. While the LS proposes a resolution to phase out the use of synthetic methionine, it failed to consider including an expiration date -for which the proposal was sent back to the subcommittee and without which the phase out cannot be accomplished."

b. Citizen Matt Lewis states: "You allow synthetic methionine to be used in poultry feed. You are destroying the integrity of the organic label."

c. Center for Food Safety (CFS) states: "Removing DL-methionine from the NL will create the much-needed drive to test and develop optimal non-synthetic feed formulations, as desired by many organic poultry producers that CFS has spoken with, and who regret the unavailability of such feed. CFS strongly recommends prioritizing further research into ascertaining the ideal level of methionine required to maintain bird health and vitality. We also support further research into assessing the viability of using insect meal as a protein source in organic poultry feeds by conducting feeding trials and scientifically testing feed formulations of combined natural ingredients to ascertain the optimum amino acid content needed. CFS strongly supports the Livestock Subcommittee's proposal to remove methionine from the National List. This will send a strong market signal to organic poultry producers of the need to test and demand feeding trials to determine optimum sources and levels of natural, methionine in organic feeds. It is long overdue for the NOSB and the NOP to send a strong market signal to the organic poultry industry that synthetic methionine will no longer be allowed in organic production. Not only has the relisting of methionine been allowed based false industry claims of its necessity and essentiality, but its presence on the NL has served to stall the development of non-synthetic alternatives. CFS strongly supports the Livestock subcommittee's proposal to remove methionine from the National List."

d. Beyond Pesticides (BP) states: "Sunset gives the NOSB the opportunity to reconsider the spring decision. Beyond Pesticides urges the NOSB to delist synthetic methionine or return it to subcommittee to consider the instructions from the board at its spring 2014 meeting."

e. Fairfield Specialty Eggs (FSEI) states: "We fully support the relisting of Methionine on the National List. We do not feel that the range area supports the birds need for methionine and, like many producers, have been challenged by the step down, and look forward to the ability to average over the life of the

flock. While averaging will not get us to all of the birds' needs, it will give us some relief from many of the general bird health issues we saw."

f. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very common in poultry rations."

Mineral Oil

Allowed for topical use and as a lubricant

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Mineral oil from §205.603(b)(6)
Yes: 1 No: 3 Abstain: 1 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	5_{a-e}		
Public Interest Groups		BP_j	NOC_k
Food Processors / Handlers	CROPP, AOD_f		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	OTA_g, IOIA, $CROPP_h$		
Certifiers/MROs	$NODPA_i$, VOF		$MOSA_l$

Notes: ,

a. Scott Stoller states: "We have been using Crystal Creek No Fly and **mineral oil** as fly control. It works very well and I would definitely be disappointed to see it removed. Pyganic does work, too, but not nearly as good. It seems that the oil base stays on longer and you get a far better knock down. You also can get a pyrethrin resistance, and pyganic will no longer work. I know Crystal Creek also has a water base but it has a lot of coconut oil in it, and my Dad is extremely allergic to coconut oil. Thus, that is not an option for us. Mineral Oil is used in so many different areas of life that are extremely sensitive, I would assume that it must not be too harmful. Also keep in mind that we are not slathering the cows in oil on a daily basis. So far this year, we have used somewhere around one cup per cow for the whole year."
b. Robert Kircher of Forest Glen Dairy states: "We strongly recommend continuing to allow the use of mineral oil in organic operations. Mineral oil is used as an addition to our certified fly control solution. The mineral oil allows the fly control application to better adhere to the cows. We have experimented with the application and have proved that the addition of mineral oil greatly increases the reduction of flies on the cows. Our research shows we have very limited products that would potentially replace mineral oil.
c. Organic dairy farmer Josiah Miller states: "Mineral would be a product we would really miss for fly control."
d. Organic dairy farmer Josh Payne states: "We support the use of mineral oil as a delivery method to apply organic certified fly controls. Water as a delivery is economically not viable as its nature to evaporate almost instantly. Mineral oil should continue to be listed as an approved synthetic substance."
e. Organic dairy farmer Jeremiah Lambright states: "We need mineral oil to mix fly sprays. If mineral oil gets put out, the winged empire will take over."
f. Aurora Organic Dairy (AOD) states: **"**Mineral oil is the only external lubricant on the National List for organic livestock production. This substance is also important for fly control. AOD requests the continued allowance of Mineral Oil on the National List as it is essential to the health and welfare of organic livestock."

g. Organic Trade Association (OTA) states: "Controlling flies and performing AI breeding are routine activities on organic dairy operations, and mineral oil remains necessary for both these functions."
h. CROPP Cooperative/Organic Valley states: "This material received a lot of interest from our membership. It is very widely used in topical applications as a carrier for fly control products. Additionally, it is used as a lubricant. This is one tool that must stay in the farmer's toolbox. Please keep mineral oil on the National List!"
i. Northeast Organic Dairy Producers Alliance (NODPA) states: "NODPA supports NOC's comments 'that the allowed use of mineral oil be clarified as being for topical use and as a lubricant, but not acceptable as a treatment for omasal impaction'."
j. Beyond Pesticides (BP) states: "Beyond Pesticides supports the delisting of mineral oil. There are alternatives to both use as an external parasiticide and as a lubricant that are more compatible with organic production. If the NOSB decides to keep mineral oil on the National List, the prohibited internal use should be eliminated by a change of annotation – for instance, 'as an orally administered treatment of constipation in cattle and other ruminants'– or by noting the exception in the NOSB recommendation. If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
k. National Organic Coalition (NOC) states: "NOC asks that the allowed use of mineral oil be clarified as being for topical use and as a lubricant, but not acceptable as a treatment for omasal impaction."
l. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Commonly used topically with fly control products and also used as a lubricant."

Oxytocin

For use in post-parturition therapeutic applications, to increase contractions that assist in recovering from uterine prolapse

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Oxytocin from §205.603(a)17
Yes: 0 No: 6 Abstain: 0 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4_a		
Public Interest Groups	BP_b		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		LVC_c
Certifiers/MROs			CCOF, $MOSA_d$

Notes:

a. Organic dairy farmer Josh Payne states: "We support the continued listing of Oxytocin as a substance to be used in post parturition therapeutic applications in livestock.
b. Beyond Pesticides (BP) states: "While Beyond Pesticides is supportive of relisting, we are concerned that comments reported by OTA conflict with Dr. Karreman's understanding of the allowed use of oxytocin and wonder whether the annotation could be clarified –or at least, the NOSB could clarify it in the written record of the recommendation."
c. Lander Vet Clinic (LVC) states: "Oxytocin is a drug utilized to reduce retained placentas by causing contraction of the myometrium."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "An important tool for some farmers for use according to restrictions, but not super common. Some milk buyers prohibit use."

Parasiticides: Fenbendazole, Ivermectin, Moxidectin

As disinfectants, sanitizer, and medical treatments as applicable

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Fendbendazole from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	$5_{a, i, j}$		
Public Interest Groups			BP_c, NOC_c, CFS_c
Food Processors / Handlers			AOD_f
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	$WODPA_b$ LVC_d, $IOIA_d$ $NODPA_h$, IOS		OTA_f, $CROPP_k$
Certifiers/MROs	$OEFFA_e$, CCOF		VOF_f, MOSA

Notes:

a. Organic dairy farmer Scott Stoller states: "Regarding Cydectin, I would be unhappy to see this removed. We have used it for the last two years on a couple of calves around 6 months old. I don't feel it should be a free-for-all. I am happy with the current organic standards. Conventionally, there is no milk or meat withhold but organically there is minimum of 90 days withhold for milk and the meat is never able to be organic. Also if the mother of a calf is closer than 3 months to freshening the calf can't be organic. We rotate pastures faithfully and still have trouble occasionally. We have never needed Cydectin in the winter. For some reason the parasites go away. We finally decided to simply keep the calves off pasture till 6 months of age and have had better results. Even then we occasionally have either a small group or calves or sometimes one calf in the group that needs to be wormed. These calves are carefully documented to ensure they will never be sold as organic meat and OEFFA has the list of every animal on the farm with the ones we wormed marked clearly so they know exactly what is going on. We have never had a problem with parasites in older animals. They are always in the 6 months or younger age. If they are older and need to be wormed, it is because we let them struggle for a while before we wormed them. I don't think I have ever seen a healthy sleek calf over six months old get parasites. It just isn't a problem when they get bigger. We have used black walnut hulls with some/limited success. Also keep in mind that black walnut hulls are actually toxic to the calves if fed too much. We have had times that it seemed to work and other times where the end result was dead calves. We have done stool samples to confirm the problem and Cydectin pulls them right out of it. So, to condense my thoughts into a few key points, I feel Moxidectin should be allowed for use in young calves. It should not be thought of as a routine etc., but a tool to save a calf's life in certain situations Dr. Guy (Jordowski) recommended we use Cydectin over Ivomec because Ivomec kills dung beetles while Cydectin does not. I would not mind if you look at Ivomec, Cydection, and Safe Guard to name a few and prohibit one or the other if the side effects are worse etc. However, to take all three could really cause some problems."

b. Western Organic Dairy Producers Alliance (WODPA) states**: "**WODPA recommends continued listing of Ivermectin. Ivermectin is permitted for use, only in the event of an emergency, when organic system plan-approved preventive management does not prevent infestation. The overwhelming majority of producers, responding to our survey, opined that Ivermectin needs to remain on the list to provide an option in the event of an emergency. NOSB might want to consider an annotation restricting Moxidectin and Ivermectin's use to 'dairy animals of non-breeding age.' If the treatment of female dairy animals of breeding age is to continue, there should be an annotation stating 'only for use by or on the lawful written order of a licensed veterinarian when treating breeding age dairy animals.' Only one company

manufactures Fenbendazole for the treatment of parasites in dairy cattle. Only one company manufactures Moxidectin for the treatment of parasites in dairy cattle. Limiting the parasiticide options to Fenbendazole creates a one source monopoly and places the producer in a vulnerable position. Moxidectin – WODPA recommends continued listing. The overwhelming majority of producers, responding to our survey, opined that Moxidectin needs to remain on the list to provide an option in the event of an emergency. The current recommendation is to remove Moxidectin even though the Livestock Committee determined that 'This material satisfies the OFPA Criteria.' The Livestock Committee fails to cite anything in the 2015 Technical Evaluation Report supporting their recommendation to remove Moxidectin. Further, the Livestock Committee has presented no new information supporting removal.

c. Beyond Pesticides (BP), National Organic Coalition (NOC), and Center for Food Safety (CFS) recommend removing Ivermectin from the National List, while leaving fendbendazole and moxidectin for emergency use only.
d. Lander Vet Clinic (LVC) and International Organic Inspectors Association (IOIA) do not support removal of any of the three currently listed parasiticides. "It is already challenging for producers to produce organic meat, wool, and milk without these tools. They are not allowed for slaughter stock, and the withdrawal times are quite strict already. We do not see abuses of these parasiticides."
e. Ohio Ecological Food and Farm Association (OEFFA) states: "Those OEFFA producers who report having used emergency parasiticides used them to treat young stock and calves. They feel confident in their abilities to know when a calf is in need of such an emergency treatment. While OEFFA producers value input from veterinarians, most do not think they should be required to utilize parasiticides only under the written order of one, especially because the treatment is an emergency, and it may take some time for a veterinarian to be available. Because parasiticide treatments are so rare, and limited mostly to young stock, OEFFA producers do not take issue with the long milk withholding periods associated with their use."
f. Aurora Organic Dairy (AOD), Organic Trade Association (OTA), and Vermont Organic Farmers (VOF) agree with the Livestock Subcommittee's recommendation to remove Ivermectin from relisting on the National List and to keep Fenbendazole as an approved parasiticide. Both disagree, however, with the decision to remove Moxidectin.
g. Kent Henderson states: "Ivomectin antiparasitic products such as Eprinex should be removed from the approved NOSB list because of their detrimental effect on the dung beetle and growing evidence of anthelmintic resistance."
h. Northeast Organic Dairy Producers Association (NODPA) states: "The dairy industry does need some tools to deal with a heavy infestation of parasites and does need different options for a variety of environments and resistance to different chemicals, for example if a whole herd was infected with lung worm that approved products were not able to remove, the ability to use a parasiticides in an emergency to save the herd should be available. Within the organic dairy industry the use of parasiticides is very rare because of preventative measures and grazing management. Young livestock are the biggest challenge when it comes to controlling stomach worms but good grazing management and attention to appropriate rations for the stage of growth reduce the incidence of any infestation. The control of stomach worms in milking goats and sheep is more difficult and does present continuous challenges in prevention and treatment with management of grazing, rations, housing and use of approved products. None of these three parasiticides are recommended for use on dairy goats and sheep and as such there are no approved withdrawal times. Any use would be under the control of a licensed veterinarian as an extra label use. The original intent of the NOSB when they allowed Fenbendazole to be used was to replace Ivermectin which is clearly shown in the transcripts of that meeting. Ivermectin can be toxic to dung beetles, which are an integral part of pastureland ecology. Removing Ivermectin honors the intent of previous NOSB recommendations while still allowing producers the option of using two parasiticides. Producers do have the option of using other parasiticides but must remove the dairy animals from organic production. Moxidectin can be used to destroy heavy infestations of lice, horn flies, cattle grubs and mange mites whereas as Fenbendazole does not. Ivermectin is used to control these external parasites so in order to give producers the tools to control external parasites without being able to use Ivermectin, we recommend that the restriction for using it only for internal parasites be removed.
i. Organic dairy farmer Misty Anne Koloski states: "Many farms struggle with internal parasites especially in young stock. Despite best efforts at times, calves require the use of parasiticides. This should remain a 'last resort' treatment. Some animals would become severely anemic and die without treatment."
j. Organic sheep and goat farmer Garth Karl states: "With respect to the proposed sunset of synthetic parasiticides from 205.603(a)(18), I urge you in the strongest possible terms to leave all these materials on the national list. My wife and run a small certified organic operation that has been certified for 22 years. Among other things we raise certified organic goats and sheep and sell a few locker lambs. I also consult for other certified organic livestock operations around the US. From observing the comments of the Livestock Subcommittee, and even the position of the OTA on this issue, it appears that the interests

of small ruminant (sheep and goat) producers are not being considered. Small ruminants in North America are much, much more susceptible to parasites, in particular Barber Pole Worm (Haemonchus contortus) than cattle. Because of parasites it is virtually impossible to successfully grow organic slaughter lambs or goats in many areas of the country, including the maritime Pacific Northwest and the Southeast. Any savvy small ruminant producer today, both organic and conventional, is taking an integrated approach to parasite control, because of the widespread growth of resistance to parasites. This approach involves making treatment decisions based on variety of factors including:
The individual animal's Body Condition Score (BCS), The FAMANCHA test for anemia, symptom of infection with Haemonchus contortus, and a rough indicator of parasite load, fecal egg counts, Multi-species grazing for ROTATION OF PARASITICIDES. Before you suggest removing these tools from small ruminant producers consider this: Virtually ALL the organic wool consumed in the US comes from overseas, where Ivermectin and other parasiticides are allowed. The NOP has ruled that wool is a livestock product under 205.236 and us such animals used to produce organic it can never be treated with synthetic parasiticides. According to the NOP website, there are no longer ANY commercial scale organic goat dairies in Oregon or Washington. I have personal knowledge that last one surrendered this year. Any producer with any common sense is already using BCS, FAMANCHA and fecal egg counts to decide when to treat individual animals...never the whole herd. Why, because there is already a massive problem with resistance to parasiticides, particularly in the southeast. So if, and it's still a big if, Ivermectin has detrimental effect on dung beetle, this product would only be used on a small percentage of the herd. There are precious few certified organic lamb producers listed on the NOP website. Those that are listed are in cold climates where they get a real kill of Barber Pole Worm. It is very hard in most areas of the country to get a market lamb to weight, chiefly because there are no good organic alternatives available. There aren't. Ask Dr. Jean Richardson! A review of the NOP website reveals 0 livestock operations with "lamb" or "sheep" in their product profile in the state of Oregon (our farm, "Common Treasury Farm," has too many products on the list and the website didn't pick it up), Washington, also 0! Virginia...also 0! This enough should be enough to show anyone but the most zealous, wholesale opponent of synthetics, that people can't even make it under the current rules, let alone not being able to keep their breeding stock healthy!

k. Guy Jordowski, DVM for Organic Valley, CROPP, states: "*Should sheep fleece and wool be allowed to be certified organic even if use of parasiticides was necessary at some time in the animal's life?*
Yes, if an extended withdrawal time was observed – i.e., 14 to 30 days for Moxidectin or Fenbendazole. Ivermectin should not be allowed and should be removed from the list of allowed synthetic treatments for organic livestock. *Should use of moxidectin be changed to allow both internal and external use?*
Yes, but with the same restrictions as for internal use – emergency use only. *Should use of parasiticides be allowed only under veterinarian advice?* Yes, a veterinarian should be consulted to document the infection status – through appropriate laboratory testing (fecal samples, necropsy of dead animals, etc.). This provides documentation that use of parasiticides is limited to emergencies. The veterinarian can also provide guidance on management changes needed to avoid future infections."

Peroxyacetic/Peracetic Acid

For equipment and facility sanitization

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Peracetic acid from §205.603
Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		1[d]	
Farmers			
Public Interest Groups	BP[a]		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers	BioSafe Systems[b]		
Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC, IOIA		
Certifiers/MROs			MOSA[c]

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides supports the relisting of peracetic acid because of its usefulness as a replacement for chlorine compounds, wider range of usefulness, and innocuous degradation products."

b. BioSafe Systems, LLC states: "While hydrogen peroxide may occur alone as a formulated product, Peroxyacetic acid (PAA) solutions typically exist together with hydrogen peroxide and acetic acid in an aqueous solution. These solutions rapidly degrade into acetic acid, oxygen, and water, none of which are of toxicological concern. As such, there are no residues. Hydrogen Peroxide and PAA are effective no-residue sanitizers for use on food contact surfaces, food handling, dairy processing equipment and vessels, against a large number of gram negative and gram positive bacteria, fungi and many human health pathogens. Proper sanitation of farms and processing facilities are critical to ensure the protection of public health from food-borne pathogens. Hydrogen Peroxide and PAA are used in livestock facilities to clean stalls, and equipment and are effective disinfectants against many organisms including control of human and animal health pathogens on hard surfaces, equipment and structures. Hydrogen Peroxide is also used as a medical treatment in the cleaning and treating of wounds and hoof conditions by livestock growers.

c. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Commonly used for equipment sanitation."

d. Citizen Margaret Goodman states: "This is to urge NOSB to ask whether peracetic acid is needed. Peracetic acid is another powerful oxidizer, but it breaks down to harmless materials, unlike chlorine. Peracetic acid is an irritant of the skin, eyes, mucous membranes, and respiratory tract."

Phosphoric Acid

For equipment cleaning, provided that no direct contact with organically managed livestock or land occurs

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Phosphoric acid from §205.603
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens		1_c	
Farmers	1_a		
Public Interest Groups	BP_b		
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	OPWC IOIA		
Certifiers/MROs			$MOSA_d$

Notes:

a. Organic dairy farmer Josh Payne states: "Phosphoric acid should be listed based on its use as a cleaning agent of dairy processing equipment. It is of importance in the preventative maintenance of dairy equipment."
b. Beyond Pesticides (BP) states: "While we support relisting of phosphoric acid, we encourage the LS to look at alternatives in EPA's Safer Choice program."
c. Margaret Goodman states: "This is to urge you to seek safer alternatives to phosphoric acid. Phosphoric acid is used to remove deposits on equipment, so its use is slightly different from other sanitizers. Phosphoric acid poses environmental risks in manufacture and disposal, and health risks during use."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Commonly used for equipment sanitation."

Poloxalene

For the emergency treatment of bloat

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Poloxalene from §205.603(a)
Yes: 1 No: 5 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups		BP[a]	
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "Beyond Pesticides opposes the relisting of poloxalene because there are natural alternatives, as indicated by Dr. Karreman."

Procaine

Local anesthetic requiring 90-day withdrawal period for slaughter animals and 7-day withdrawal for dairy animals

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Procaine from §205.603(b)
Yes: 1 No: 5 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups	NOC[a]		BP[e]
Food Processors / Handlers		CROPP[d]	
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	OTA[b]		IOIA[f]
Certifiers/MROs	NOPDA[c]		MOSA[g]

Notes:

a. National Organic Coalition (NOC) states: "NOC supports the relisting of procaine and the reduction of the withdrawal time. Procaine is very similar to Lidocaine and should be an important and essential tool for farmers in animal welfare protocols because it is very important for animal pain suppression. It is a true local anesthetic and only numbs the area to be worked on. The withholding time should be the same as that recommended for Lidocaine, 48 hours."
b. Organic Trade Association (OTA) states that: "Both procaine and lidocaine are used as local anesthetics for minor surgery performed on organic animals. These substances are used to minimize pain and should be retained on the National List from an animal welfare perspective."
c. Northeast Organic Dairy Producers Association (NODPA) supports the relisting of procaine and the reduction of the withdrawal time. Procaine is very similar to Lidocaine and should be an important and essential tool for farmers in animal welfare protocols because it is very important for animal pain suppression. It is a true local anesthetic and only numbs the area to be worked on. The withholding time should be the same as that recommended for Lidocaine, 48 hours.
d. Dr. Guy Jordowski, DVM with CROPP Cooperative states: "As a practicing livestock veterinarian with 28 years of experience I have never used the drug procaine on livestock other than in combination with penicillin (Procaine Penicillin G). I am not aware of procaine being marketed or used on any livestock in the US. It seems that this material should be removed from the NOP list of allowed synthetics."
e. Beyond Pesticides (BP) states: "Beyond Pesticides is neutral on the relisting of procaine, but supports the re-examination of the withdrawal period if it is relisted."
f. International Organic Inspectors Association (IOIA) states: "It is our position that [the annotation change] represent[s] an improved and sound and sensible approach to implementing the organic regulations."
g. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "We do not observe this material being used."

Sucrose Octanoate Esters

Surfactants (closely related to soaps) that have a mode of action similar to insecticidal soaps; used as insecticide/miticide for bees.

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Sucrose octanoate esters from §205.603(b)
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups	BP[a]		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Notes:

a. Beyond Pesticides (BP) states: "SOEs were originally petitioned as a control for varroa mites on honey bees – and that remains the only supported livestock use. We are disappointed that we have not seen comments from beekeepers concerning the relative efficacy and hazard of SOEs in controlling varroa mites, and we hope that the LS has sought input from beekeepers. Nevertheless, in view of the restrictive use of SOEs, we agree with the LS statement, 'Given the difficulty bee keepers are experiencing maintaining the health of honey bee colonies in recent times, the subcommittee thought it essential for SOEs to remain on the National List.'"

Tolazoline

Tolazoline is used to reverse the effects of xylazine.

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Tolazoline from §205.603
Yes: 0 No: 5 Abstain: 1 Absent: 0 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens	1		
Farmers	1		
Public Interest Groups			BP
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

Trace Minerals

For diet enrichment or fortification when FDA approved

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove trace minerals from §205.603(e)
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	5[a,b]		
Public Interest Groups			BP[c]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			CCOF, MOSA[d]

Notes:

a. Organic dairy farmer Josiah Miller states: "Minerals and vitamins are important to keep animals healthy and prevent disease."
b. Organic dairy farmer Josh Payne states: "Trace Minerals should continue to be listed, as they are vital to the overall health of livestock and help prevent disease, while aiding in the maintenance of growth, reproduction, and overall health."
c. Beyond Pesticides (BP) states: "Organic production should not be dependent on synthetic nutrients. While we realize that the variability in forage and feeds may occasionally lead to a need for supplementation, the existing annotation is not restrictive enough to prevent reliance on synthetic materials. Therefore, we recommend adding the annotation, 'When forage and available natural feeds are poor quality.' If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very common – almost every livestock farm."

Vitamins

Allowed for diet enrichment or fortification when FDA approved

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove Vitamins from §205.603(d)
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	4[a,b]		
Public Interest Groups			BP[c]
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			CCOF, MOSA[d]

Notes:

a. Organic dairy farmer Josiah Miller states: "Minerals and vitamins are important to keep animals healthy and prevent disease."
b. Organic dairy farmer Josh Payne states: "Vitamins are essential for good health and nutrition of animals, and should continue to be on the list."
c. Beyond Pesticides (BP) states: "The listing for vitamins should be replaced with one for vitamins A, C, and D because the need for synthetic forms of others is not supported: 205.603(d) As feed additives (3) Vitamins A, C, and D, used for enrichment or fortification when forage is not available and available natural feeds are poor quality.
If the NOSB chooses this option, we suggest that the motion be sent back to the LS for the development of an annotation that could be considered with the sunset proposal in spring 2016."
d. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Very common – almost every livestock farm."

Xylazine

Sedative, analgesic (pain killer) and muscle relaxant in veterinary medicine

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove from §205.603
Yes: 0 No: 5 Abstain: 0 Absent: 1 Recuse: 0

	Support Relisting	Oppose Relisting	Neutral/ Seeks Clarification
Citizens			
Farmers	2		
Public Interest Groups			BP_a
Food Processors / Handlers	AOD		
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants	IOIA		
Certifiers/MROs			$MOSA_b$

Notes:

a. Beyond Pesticides (BP) states: "The FDA's regulations are confusing, given the fact that in spite of what appears to be explicit language in FDA regulations prohibiting the use of xylazine in food animals, it nevertheless appears to be in common use in certain situations, with FDA's blessing… AMDUCA puts a lot of responsibility on the shoulders of the veterinarian, even with the FARAD database as support. In this case, it also puts that responsibility on the shoulders of the NOSB. And it raises more general issues for the NOSB and NOP. Should off-label uses – that are not supported by regulation based on accepted scientific research – be allowed in organic production? If they are allowed, how is the public supposed to interpret that allowance as protecting organic integrity? If such uses are not allowed, does it put animals at risk? Since FDA does not force testing as entry to the marketplace, how can the NOSB and NOP ensure that animal drugs allowed under AMDUCA meet safety standards for drug use and the more stringent standards of OFPA? These questions do not necessarily need to be answered during the sunset of xylazine/tolazoline, but they should be acknowledged by the LS as valid concerns and put on the subcommittee's agenda as a discussion document."

b. Midwest Organic Services Association (MOSA), summarizing their survey of inputs they have reviewed, states: "Use is not widespread but this material is regularly used by some MOSA farmers."

LIVESTOCK 2017 SUNSET MATERIALS §205.604 Prohibited Non-synthetic Substances

Strychnine

Pest control (poison)

Sunset 2017: To be voted on at the fall 2015 meeting

Vote in Subcommittee:
Motion to remove strychnine from §205.604
Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

	Support Relisting	Oppose Petition	Neutral/ Seeks Clarification
Citizens			
Farmers			
Public Interest Groups	BP		
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers/MROs			

MATERIALS SUBCOMITTEE PROPOSALS

Research Priorities for 2015

Proposal: August 24, 2015

Comment*:* A Recommendation for a Framework to set Research Priorities was approved at the National Organic Standards Board (NOSB) meeting in May 2012. Part of that recommendation was that the research priorities from the previous year of NOSB deliberations would be presented at each fall meeting.

Research Priorities for 2015:

1. 2015 Materials and GMO ad Hoc Research Priorities: Prevention of GMO Contamination: Evaluation of effectiveness
2. 2015 Livestock Subcommittee Research priorities: (a) Prevention and management of parasites, (b) Herd and Flock Health, and (c) Evaluation of on Methionine in the Context of a System Approach in Organic Poultry Production
3. 2015 Handling Subcommittee Research Priorities: Chorine Materials
4. 2015 Crops Subcommittee Research Priorities: Alternatives to Copper for disease and algae control

Vote in Subcommittee:
Motion to adopt the proposal on NOSB Research Priorities for 2015
Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

	Support Proposal	Oppose Proposal	Neutral/ Seeks Clarification
Farmers / Citizens			
Public Interest Groups	BP_a, $OFRF_b$		CFS_f, NOC_g, TOC_h
Food Processors / Handlers	SFC_c		
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	$OPWC_d$		
Certifiers	$CCOF_e$		

Notes:

a. Beyond Pesticides (BP) states: "We particularly support the livestock proposals to look at parasites, herd/flock health, and alternatives to methionine in a systems context… [but] we were disappointed that we did not see a report of progress on the NOSB investigation into contaminated inputs. With farmers resorting to contaminated water resources in times of drought, we believe it is imperative that this work continue and that it address contaminated water resources as well as manure, compost, mulch, and other materials imported to the farm."

b. Organic Farming Research Foundation (OFRF) states: "With growing consumer demand for organically produced goods, the market is providing economic incentives for U.S. farmers across a broad range of

products but barriers to this transition remain due to a lack of research."

c. Straus Family Creamery (SFC) states: "Research into successful models of livestock production outlined in the Herd and Flock Health section—specifically the study of which breeds are doing best under organic management, and which grazing management systems are producing the highest quality organic product—would be extremely helpful to family farms. It would help guide farmers on how to have the best herd health, and would ultimately cut the cost of doing business by reducing their cull rate, and/or the amount of unusable milk they produce."
d. Organic Produce Wholesalers Coalition (OPWC) states, in part: "OPWC appreciates the efforts of the Materials Subcommittee to track the research needs that arose during the NOSB's work. We endorse all of the topics included in the Subcommittee's proposal and find that the following newly listed topics are of particular interest to the fresh produce trade: Prevention of GMO Contamination: Evaluation of effectiveness; Chlorine materials as sanitizers; Alternatives to Copper for disease and algae control. In addition, OPWC supports further research on aquaponics, particularly with regard to nutrient and mineral cycling between aquatic and crop production systems."
e. California Certified Organic Farmers (CCOF) states: "CCOF endorses the full list of research priorities that NOSB is presenting this year."
f. Center for Food Safety (CFS) states: "CFS urges the NOSB to recommend to the NOP and Secretary of Agriculture that requests for proposals (RFPs) are solicited to support the funding of field research on organic strawberry transplant production."
g. National Organic Coalition (NOC) states, in part: "CFS urges the NOSB to recommend to the NOP and Secretary of Agriculture that requests for proposals (RFPs) are solicited to support the funding of field research on organic strawberry transplant production."
h. The Organic Center (TOC) states: "Based on feedback we've received during our own outreach efforts we would also like to suggest that the areas of manure and compost safety and pollinator health be considered for inclusion in the Research Priorities for 2015.

Prevention Strategy Guidance for Excluded Methods in Crops and Handling Proposal

Draft proposal: August 11, 2015

Comment: On April 24, 2014, the National Organic Program sent a memorandum to the NOSB titled "Improved Guidance on Preventing GMO Presence in Organic Products." The memorandum asked the NOSB to provide recommendations regarding best management practices for prevention of unintended GMO presence. In response, the Materials Subcommittee prepared the proposal now being commented on.

Vote in Subcommittee:
Motion to accept the Prevention Strategy Guidance for Excluded Methods in Crops and Handling Proposal
Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

	Support Proposal	Oppose Proposal	Neutral/ Seeks Clarification
Farmers / Citizens			1
Public Interest Groups			CFS_c, NOC_d, BP_e, OSA_f
Food Processors / Handlers			SFC_g
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants	OTA, $OPWC_a$		
Certifiers	ACA_b		CROPP, $MOSA_h$, $OEFFA_i$, $CCOF_j$

Notes:

a. Organic Produce Wholesalers Coalition (OPWC) states, in part: "Since the organic community is part of a society that requires 'co-existence' with GMOs at this time, OPWC acknowledges the need for organic operations to share responsibility for the exclusion of the methods and products of genetic engineering. However, in our opinion, organic growers and handlers are already doing more than their fair share to keep products of genetic engineering out of organic food. We agree with the Materials Subcommittee that guidance from NOP specifically focused on the topic of shared responsibility would strengthen future policy statements and efforts from the organic trade to protect organic products from GMO contamination."

b. Accredited Certifiers Association (ACA) states: "The Accredited Certifiers Association supports the work of the Materials Committee and believes the information presented in the Proposal will be helpful to all sectors of the organic community to assist in the prevention of GMO contamination. We urge the Subcommittee to draft an additional recommendation to the NOP for the creation of additional guidance and training of ACAs on conducting GMO sampling and testing."

c. Center for Food Saftey (CFS) states: "CFS recommends that the Secretary of Agriculture and the NOP Deputy Administrator sign a Memorandum of Understanding (MOU) in which they jointly agree to require that GE growers and GE patent holders adopt mandatory contamination prevention measures. Moreover, until mandatory GE contamination prevention measures are in place that demonstrate that GE contamination prevention is possible, CFS calls for a moratorium on the approval or deregulation of any new GE crops."

d. National Organic Coalition (NOC) states: "The proposed guidance encompasses actions already taken by organic farmers. Therefore, we believe that there is no other way to prevent GE contamination, and to truly protect organic integrity, than for USDA to require GE users and patent holders to take deliberate

and mandatory prevention action instead of merely giving lip service to it. Organic growers continue to experience damages and losses of productivity due to GE contamination, despite their efforts at prevention. Their GE contamination prevention practices include: buffer strips, delayed planting dates, wind breaks, enhanced equipment and storage cleaning practices, etc. At best, these practices constitute an inconvenience, and at worse they constitute a loss of profits, markets, reputation, partnerships, public trust, and an abuse of the bundle of rights guaranteed to individuals as part of the U.S. Constitution."

e. Beyond Pesticides (BP) states: "The NOSB must call upon the Secretary of Agriculture to reverse his policy of allowing more and more genetically engineered crops and to support legislation that places liability for damages on the patent holder."
f. Organic Seed Alliance (OSA) states: "Increasing the availability of high-quality organic seed that meets the diverse and regional needs of organic farmers is paramount to the success of organic agriculture and the integrity of the organic seal."
g. Straus Family Creamery (SFC) states: "…I would ask for clarification on the statement in Section II, Background: "Background levels of naturally occurring or synthetic chemicals that are present in the soil or present in organically produced agricultural products that are **below established tolerances.**" We need additional guidance on what the specific "established tolerances" are for GMOs."
h. Midwest Organic Services Association (MOSA) has detailed comments on the proposal, stating in part: "The proposal states, if GMOs are suspected, then certifiers must conduct an investigation to determine if a violation of organic farming or processing standards occurred. Due to the strong possibility of unintentional contamination of the organic agriculture industry by GMO materials, we're inclined to believe that, more often than not, some presence of GMOs is *suspected*. Without clearer guidance, we cannot determine when it would and would not be appropriate to conduct an investigation. Clearly, if we suspect a client is using GMOs, we'll investigate accordingly. But, suspicion of contamination is more complex. Additionally, if organic product is found to test positive for GMO contamination, current standards do not facilitate a clear path toward corrective action, since, for some crops, determining the source of contamination may be nearly impossible. Finding a producer to be in non-compliance due to incidental environmental contamination may lead to an untenable relationship between producers and certifiers. On the other hand, acknowledging that contamination may not be totally avoidable may damage consumer confidence in the Organic Seal."
i. Ohio Ecological Food and Farm Association (OEFFA) states: "We recommend the NOSB issue a clarifying statement that fracking wastewater containing prohibited substances cannot be used as irrigation water in organic systems."
j. California Certified Organic Farmers (CCOF) states: "Overall, the prevention strategy guidance is helpful because it clarifies best management practices to prevent contamination from genetically modified organisms (GMOs). However, the prevention strategy guidance does not adequately address prevention strategies for seed."

POLICY AND PROCEDURES MANUAL

Public comments on the new draft proposal

New Draft: August 11, 2015 (last revised April 11, 2012)

	Support New Draft	Oppose New Draft	Neutral/ Seeks Clarification
Farmers / Citizens		53	
Public Interest Groups		BP	NOC_a, CFS_b
Food Processors / Handlers			
Ingredient Suppliers / Material Manufacturers			
Wholesalers/Distributors / Retailers			
Trade Associations / Industry Consultants			
Certifiers			

Notes:

a. National Organic Coalition (NOC) states, in part: "It requires a great deal of effort to determine what changes are being proposed to the Policy and Procedures Manual (PPM), which acts as by-laws for the NOSB. We can only assume that most members of the NOSB are in the same position as members of the public with regard to identifying changes. In addition, with the extensive reorganization, it is often difficult to determine whether a section has been moved or deleted. We were able to determine, however, that there are several substantial changes being announced – apparently without giving the NOSB an opportunity to vote on them. To announce such changes without justification – or even identifying them - is far from the transparent process that we should be able to expect. NOSB members should demand to vote on the changes before they go into effect and demand the following before such a vote: 1. A redlined version, such as one produced using 'track changes' in Word; 2. An annotated table of contents that indicates which sections have been moved or changed, and; 3. An explanation and justification of each change."

b. Center for Food Safety (CFS) states: "CFS strongly urges the NOP to make the revisions to the PPM as transparent as possible by explaining what changes were made… the PPM must clearly distinguish between documents that are available under the FACA and those that must be requested through FOIA procedures to guarantee the proper disclosure of NOSB materials. CFS further urges the NOP to define 'non-public information' in way that complies with FACA to ensure that the public has an opportunity to stay informed about NOSB activities."

INDEX OF MATERIALS