

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday January 7, 2014 2:00 pm ET**

**Present:** Jay Feldman (JFe), Francis Thicke (FT), Harold Austin (HA), Zea Sonnabend, Chair (ZS), Carmela Beck (CBe), Mac Stone (MS) – sitting in

**Absent:** John Foster (JFo), Colehour Bondera (CBo)

**Staff:** Michelle Arsenault (MA), Stacy Jones King (SJK)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) <a href="#">Original petition 2008</a>	CBo	Y 10 25 13  <a href="#">3/2010 TR</a>	<a href="#">Original recomm May 2009</a> Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 601(a) <a href="#">Original petition 2006</a>	ZS	Y 02 14 13  <a href="#">8/2006 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: <a href="#">2004</a> , <a href="#">2006</a>	JFe?	Y 02 14 13  <a href="#">9/2003 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
2016 Sunsets					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<a href="#">2004 TAP</a>  <a href="#">2010 TR</a> <a href="#">2012 TR</a> <a href="#">Supp</a>  No addit TR	Sunset Date: 09 12 16 <a href="#">2003 Petition to add to 205.601</a> <a href="#">2003 Petition supplement</a> <a href="#">2005 NOSB rec (passed)</a>  <a href="#">2009 Petition to remove from 205.601(h)</a> <a href="#">2012 NOSB rec (failed)</a>		Summary: Spr 2014 Review: Fall 2014

Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2003 TAP</a>	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition</a> <a href="#">NOSB rec</a>		Summary: Spr 2014 Review: Fall 2014
Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
<a href="#">Vinasse</a> - proposal List at §205.601	ZS/N M	<a href="#">08 13 13 Expedited, modified TR</a>	Petitn sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found sufficient 12 03 13		Proposal Spring 2014
<a href="#">Laminarin</a> List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13. <b>Determine need for TR</b>	Classifica tion vote: 12 17 13	Proposal Fall 2014?
<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT		Petition sent to CS on 06 06 12Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; <b>Petition sufficiency due ASAP. Waiting on CS action based on EPA feedback and addendum from petitioner</b>		TBD
Antibiotics ( <a href="#">Streptomycin</a> ) proposal. Amend annotation, §205.601	ZS/HA	<a href="#">3/2011 TR</a> <a href="#">1/2006 TR</a> <a href="#">10/1995</a> <a href="#">TAP</a>	<a href="#">Apr 2011 Final Recomm.</a> NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13. <b>Fall 2013 meeting cancelled. Revising based on public comment</b>	08 06 13	Spr 2014
<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007 Magnesium (HYDR) oxide TR</a>  No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. <b>Fall 2013 meeting cancelled. Possible revisions? Will discuss on Jan 21</b>	08 06 13	Spr 2014

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?

\* **Yellow highlight** indicates Subcommittee action needed

### Agenda

- Approve Crops Subcommittee notes of December 17, 2013
- Discuss vinasse checklist
- Ferric phosphate TR determination (CBe)
- Hydrogen chloride TR determination (JFo)
- Discuss public comment for two fall 2013 proposals (Strep-HA, MgO-FT)
- Adjourn

### Discussion

- Crops Subcommittee notes of December 17, 2013 were approved with minor changes made by MA.
- Vinasse checklist. JFe circulated an email with some background for the group to use for classification. The group discussed the complexities of this material because although it is a natural substance there are various opinions on how the manufacturing processes involved before, during, and after fermentation affect its classification (much like corn steep liquor). A member felt that that listing Vinasse as a prohibited natural and annotating it with the forms of Vinasse that would be allowed could be a good route to address this petition. Another member noted that the Board should consider the use of manufacturing byproducts and production of residuals as a concern when determining whether or not this is synthetic. Members discussed the use of a decision tree for classification, but felt they would need a more refined decision tree. ZS and JFe will discuss this further, and ZS will contact OMRI about the classification process of formulations of Vinasse.
- Ferric phosphate (CBe). The lead reviewer reviewed the documents, including the information from the Inerts Working Group, and feels that there is enough information from the supplemental TR to proceed. She noted that there are two differing opinions about Ferric phosphate regarding EDTA and whether or not it is an active ingredient. A member noted that a TR would not be able to provide an answer to that question, so the group chose to not request an additional TR for this material. (Noted in table above).
- Hydrogen chloride TR determination (JFo). JFo could not be on the call and will email the discussion points so the group can discuss it on the next call.

- Fall 2013 Public comment. MA added the two fall 2013 proposals to the table above for record keeping purposes and spring 2014 meeting planning.
  - Strep (HA) – The prior recommendation included removal of the expiration date, the addition of a new date of 2017, and the addition of a Board resolution about antibiotic use. The members discussed the public comment, and noted that some commenters supported the extension because this material has limited geographic use, while the majority opposed it because of the general environmental and health risk to humans, no matter the limited geographical use. A member asked if the NOP could review one of the comments which raised concerns about ...“Conclusion derived from this source...” and determine whether or not they should respond formally. Alternatively the members discussed adding some language to the proposal about this comment and that “the manufacturer disputes the findings” so when it gets posted for comment for the spring 2014 meeting, the public can add additional comments. The NOP will provide feedback to the group about this request.
  - Magnesium Oxide (MgO). The Board received a total of seven comments, all opposed to re-listing MgO. Four commenters noted their view that the new sunset process might hinder the removal of this material from the list. A member suggested an annotation with an expiration date. The Chair asked that JFe put that suggestion in writing and circulate it so they could discuss it further on the next call.
- The meeting was adjourned

#### **Future Call Schedule:**

December 17, 2013 2:00 ET

Reassign workplan items

Discuss/vote on need for TR for Laminarin

Discuss Contaminants briefing paper and response from NOP

January 7, 2014 2:00 ET

Discuss vinasse checklist

Ferric phosphate TR determination

Hydrogen chloride TR determination-deferred to January 21 call

Discuss public comment for two fall 2013 proposals (Strep, MgO)

January 21, 2014 2:00 ET

Hydrogen chloride TR determination

Determine petition sufficiency and vote on carbon monoxide

Discuss annotation for MgO

Discuss Vinasse/vote on classification

February 4, 2014 2:00 ET- call cancelled

NOSB Training meeting in DC

Feb 18, 2014 2:00 ET

Discuss and/or modify any fall 2013 proposals based on public comments

March 4, 2014 2:00 ET

March 18, 2014 2:00 ET

April 1, 2014 2:00 ET

April 15, 2014 2:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014

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Subcommittees submit tentative workplans to NOP	Mar 12, 2014
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NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

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**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday January 21, 2014 2:00 pm ET**

**Present:** Jay Feldman (JFe), Francis Thicke (FT), Harold Austin (HA), Zea Sonnabend, Chair (ZS), Carmela Beck (CBe), John Foster (JFo), Colehour Bondera (CBo)

**Absent:** none

**Staff:** Michelle Arsenault (MA), Stacy Jones King (SJK), Lisa Brines (LB)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
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<b>2017 Sunsets</b>					
Ethanol (Alcohols) 205.601		<a href="#">1995 TAP</a>	TR sent to CS 01 15 14. <b>TR sufficiency due July 15, 2014</b>		
<b>Petitioned Substances</b>					
Substance	Con- tact	TR requested?	Notes*	Vote	Meeting
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<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007</a> <a href="#">Magnesium</a> <a href="#">(HYDR)</a> <a href="#">oxide TR</a>  No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. Fall 2013 meeting cancelled. Based on Straw poll below, CS will not revise proposal for Spr 14	08 06 13	Spr 2014
<a href="#">Allyl</a> <a href="#">isothiocyanate</a> ( <a href="#">AITC</a> ) List at 205.601	HA		Petition sent to CS on 01 22 13. Petition suff due March 22, 2014.		
<b>Inert Ingredients</b>					
<b>Substance</b>	<b>Con- tact</b>	<b>TR reqtd?</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
<b>Other Proposals</b>					
<b>Project</b>	<b>Con- tact</b>	<b>Doc type</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?

\* **Yellow highlight** indicates Subcommittee action needed

### Agenda

- Approve Crops Subcommittee notes of January 7, 2014
- Hydrogen chloride TR determination
- Determine petition sufficiency and vote on carbon monoxide
- Discuss annotation for MgO
- Discuss Vinasse/vote on classification
- Adjourn

## Discussion

- Crops Subcommittee notes of January 7, 2014 were approved with minor edits.
- **Hydrogen chloride (JFo).** JFe sent a summary document to the group prior to call for which a member thanked him, commending the high quality. The same member noted that since alternative processes were not available 5 years ago, it might be worth requesting a TR to find out if alternatives now exist. JFo will craft questions and send them to ZS.
- **Discuss annotation for MgO (FT).** A member proposed an annotation to include an expiration date for MgO of 5 years. The NOP noted that they are not supportive of expiration dates and annotations, and a member added that it would be reviewed again in 5 years anyway. The NOP explained that if the substance was listed, the CS could specifically ask for public comment about organic alternatives when the substance comes up for sunset review, rather than proposing an expiration date and annotation to the original listing. Members discussed how to proceed. A member advised against becoming more restrictive with a particular material, which he feels causes dilution of the process. Therefore he also does not support the addition of an expiration date to the proposed listing. The CS Chair called for a straw vote so the group could determine how to proceed:

### Straw vote on MgO:

**Motion:** to add the following annotation and expiration date to the MgO proposal:

*Although magnesium oxide is relatively benign, its manufacture creates pollution or depends on polluting industries. The process of using salt brine depends on additions of sulfuric or hydrochloric acids, which relies on industries creating sulfuric acid pollution or the chlorine industry, and organic production should not be reliant on those industries, which do not embrace the core values and principles of organics. On the other hand, the process using dolomite limestone requires high inputs of fossil fuel energy and results in releases of carbon dioxide into the atmosphere both from combustion and from the gas driven off from the limestone.*

*It is hoped that organic standards can encourage manufacturing practices that are more benign, including those that may use nonsynthetic acids. Moreover, a rigorous review of the essentiality of liquid humates in light of current organic soil building practices should be conducted. Subject to a 2019 (or 5-year) expiration date.*

Yes: 3 No 4

The Chair indicated that the CS will not proceed with an expiration date in the annotation.

- **Vinasse.** The Vinasse checklist (draft 2) was circulated prior to call and the group discussed the edits that were made since the last call. The CS Chair and lead person noted that there are eight different sources of vinasse approved for use by OMRI, and the form of Vinasse that a member mentioned, which has post-fermentation chemicals added, is not included. The primary reviewer feels that Vinasse should be managed in the same manner as molasses on the permitted substances list (NOP 5033) for materials guidance. If the CS determines that vinasse should be classified as non synthetic, then there is only the need for a brief summary of the determination rather than a full proposal with a checklist. A member felt that there was a need for a longer conversation about prohibited naturals vs allowed synthetics. ZS noted that the proposed language remedies this, and it would be listed on the permitted materials guidance and not to be added to the National List. The group discussed this list with regard to Materials Review Organizations (MROs) and their review process when it comes to complex materials like Vinasse. The Chair acknowledged that MROs are following draft guidance and noted that OMRI struggled with this particular material because it is complicated by the fact that there are so many formulations. However, OMRI is satisfied that the ones they have approved are all non-synthetic. A

member affirmed his discomfort with this direction until the MRO review process is solidified and more enforceable. The CS will take a straw poll on classification on the next call (Feb 18).

The majority of members were in support of this approach, although a few members had some reservations. ZS will craft language for the motion and vote for the next meeting, and asked that members send her refinements to the language before the 18<sup>th</sup> so she can incorporate it into the next draft.

- Note from MA: The TR for 2017 Sunset material Ethanol was sent to the CS on January 15 and added to the table above. TR sufficiency due July 15, 2014
- **Carbon monoxide** – FT drafted and circulated a checklist and the group discussed petition sufficiency and the need for a TR. FT noted that he found the petition sufficient and the group agreed. He feels that there are outstanding issues resulting from the internal combustion engine and exhaust, since there are other gases besides carbon monoxide involved. The petition does state that it is for gas combustion engines, but the group feels the document is framed as a petition for carbon monoxide instead of exhaust gas. The NOP suggested looking at the propane petition as a model, but FT noted that although similar, CO is more complex than propane and feels like it would not be comparable. Another member pointed out that the propane petition wasn't for equipment, but was actually for the propane gas. Members suggested proceeding with this review of exhaust gas, as opposed to carbon monoxide, in which case they can begin to craft a proposal and request a TR. The group discussed alternative options such as seeking the necessary information from other sources instead of a TR; Perhaps the petitioner or public comment. The members felt that the information they need, including completeness of combustion, penetration depth into the soil, and retention of components in the soil would not be readily available to anyone but a contractor. The National List Manager (LB) joined the call to discuss this further asking the group if they felt that the information they may be able to get from a TR would impact their decision. Several members felt that a TR was necessary while others reluctantly agreed. The members decided to seek a limited scope TR. The lead reviewer will pose some questions and send them to the group for feedback. The CS also proposed a title change for this petition, from 'carbon monoxide' to 'exhaust gas from an internal combustion engine'.
- **2015 Sunset materials.** The CS received TRs for two of the 2015 Sunset materials: Sodium carbonate peroxyhydrate and aqueous potassium silicate. The CS Chair asked that the members review them before the next call so they can discuss them and determine if there are any possible questions for inclusion in the summary documents that the NOP will post. The NOP requested these by Feb 18.
- **A petition for allyl isothiocyanate (AITC)** was sent to the CS on January 21, and HA volunteered to take the lead on the review. The petition was added to the workplan above, including the due date for petition sufficiency. The CS will discuss this material on March 4.
- The meeting was adjourned

#### **Future Call Schedule:**

January 7, 2014 2:00 ET

Discuss vinasse checklist

Ferric phosphate TR determination

Hydrogen chloride TR determination-deferred to January 21 call

Discuss public comment for two fall 2013 proposals (Strep, MgO)

January 21, 2014 2:00 ET

Hydrogen chloride TR determination - done

Carbon Monoxide - Determine petition sufficiency and vote (?) Pet suff –done

Discuss annotation for MgO – took straw vote

Discuss Vinasse/vote on classification

2015 sunset materials-review possible questions to include in summary.

February 4, 2014 2:00 ET- call cancelled

NOSB Training meeting in DC

Feb 18, 2014 2:00 ET

- Discuss and/or modify any fall 2013 proposals based on public comments
- 2015 sunset materials (Sodium carbonate peroxyhydrate and aqueous potassium silicate): Review possible questions to include in summary. Determine TR sufficiency
- Carbon Monoxide -Discuss TR questions
- MgO – vote?
- Vinasse edits to proposal/vote on classification

March 4, 2014 2:00 ET

- Discuss allyl isothiocyanate (AITC)

March 18, 2014 2:00 ET

April 1, 2014 2:00 ET

April 15, 2014 2:00 ET

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			NL. Will send forth a proposal to the full Board.	vote 02 25 14	
<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT		Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Petition found suff 01 21 14. CS will discuss questions for L'mtd scope TR.		TBD
Antibiotics ( <a href="#">Streptomycin</a> ) proposal. Amend annotation, §205.601	ZS/HA	<a href="#">3/2011 TR</a> <a href="#">1/2006 TR</a> <a href="#">10/1995 TAP</a>	<a href="#">Apr 2011 Final Recomm.</a> NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13. Fall 2013 meeting cancelled. Revising based on public comment	08 06 13 Minor revisions 02 18 14 Accepted unanimously	Spr 2014
<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007 Magnesium (HYDR) oxide TR</a>  No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. Fall 2013 meeting cancelled. Based on Straw poll 01 21 14, CS will not revise proposal for Spr 14	08 06 13	Spr 2014
<a href="#">Allyl isothiocyanate (AITC)</a> List at 205.601	HA		Petition sent to CS on 01 22 13. Petition suff due March 22, 2014.		
<b>Inert Ingredients</b>					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
<b>Other Proposals</b>					
Project	Contact	Doc type	Notes*	Vote	Meeting

Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?
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\* **Yellow highlight** indicates Subcommittee action needed

### Agenda

- Approve Crops Subcommittee notes of January 21, 2014
- Modify any fall 2013 proposals based on public comments
  - Strep (HA)
  - MgO (FT)
- 2015 sunset materials: Review possible questions to include in summary. Determine TR sufficiency
  - Aqueous potassium silicate - Jay
  - Sodium carbonate peroxyhydrate (ZS)
  - Sulfurous Acid - (CBo)
- Vinasse proposal/vote on classification and proposed guidance listing - (ZS)
- Laminarin proposal review/edits - (ZS)
- Carbon Monoxide - Discuss TR questions – (FT) if time allows
- Preliminary workplan discussion for next semester
- Adjourn

### Discussion

- Crops Subcommittee notes of January 21, 2014 approved with no changes.
- **2013 proposals:**
  - Strep (HA) - The group discussed and ultimately incorporated some revised language that clarified a statement in the proposal about efficacy. The revision was the result of public comments that were received in the fall of 2013 from one of the manufacturers. The proposal was approved without objection and will be posted for the spring 2014 comment period.
  - MgO (FT) - The group unanimously chose to post this as is, with no revisions to the fall 2013 proposal.
- **2015 sunset materials:** The members determined TR sufficiency for the three sunset materials and reviewed possible questions to include in the summary postings. They also talked about the sunset review in general.
  - **Aqueous potassium silicate** - (JFe). The TR was found sufficient. A member circulated a checklist that he personally uses to review materials, and included some statements/questions he suggested adding to the sunset summary list. The group discussed the list of questions. Many members felt that a couple of the questions could not be answered via public comment, and that the majority of the others could be folded into one another, to condense the list. The CS Chair feels that the two major issues identified (re: foliar application of potassium silicate and its impacts on the nutritive value of treated foods, and essentiality) are appropriate and should be included in the summary. The NOP suggested strengthening and clarifying the links between the questions and the OFPA criteria and noted that it would be more effective if the statements were posed as questions. The document will be revised and resent to the CS.
  - The Chair called for a straw poll for each one of the questions on the list for aqueous potassium silicate, which resulted in the removal of several and the combining of others. A member added that with regard to the two major issues, "Nutritive value" is not part of the OFPA criteria for crop materials and the questions should focus on those criteria the Board uses in their review.

The CS Chair requested any final comments be sent by noon Wednesday, Feb 19 so she can finalize the documents and send them to the NOP by the deadline.

- A member offered that the sunset instructions do not make it clear that in order for comments to be considered during proposal writing, they must be submitted during the first phase of the sunset process (i.e. the posting of the sunset summary list). According to the new process, public comment received during the second phase (the posting of the proposal) would not be received in a timely manner and the Board would not have the time or opportunity to make changes based on the comments. If new, relevant information is presented at the second posting that could alter the outcome of the vote; the Board does have the option of postponing the vote to the following meeting, although likely this would conflict with the sunset dates.
- A member requested that in the future documents for discussion be presented to the Subcommittee members further in advance so they have enough time to review them prior to the conference call.
- **Sodium carbonate peroxyhydrate (ZS)**. The TR was found sufficient. The members discussed information cited in the TR about international research on field tests. The members unanimously agreed to pose a question in the summary seeking information about field experience, particularly in rice production.
- **Sulfurous Acid (CBo)**. The TR was found sufficient. The principal reviewer circulated some potential questions for the TR contractor, and the group felt that the questions would be better answered via public comment. Several members felt that the breakdown process is too complicated and there are too many variables to be able to glean useful answers. Other members disagreed, and felt the process was not complicated. A member offered to write some questions and send them to the Chair. The same member requested that the following text be added to the notes, as there wasn't enough time on the call to discuss them. These answers were in response to information the NOP provided to the Subcommittee about the definition of fertilizers:

#### [§205.2 Terms defined.](#)

*Fertilizer.* A single or blended substance containing one or more recognized plant nutrient(s) which is used primarily for its plant nutrient content and which is designed for use or claimed to have value in promoting plant growth.

1. *The question is not whether sulfurous acid is a fertilizer, but whether the sulfate produced by its degradation is.*
2. *You would not find sulfurous acid on any list of fertilizers from the AAPFCO because it is unstable (which is why it is produced on-farm by a generator) and thus not sold as a fertilizer. TR lines 64-66: "In fact, sulfurous acid is not chemically stable at temperatures above -196.15 o C. The predominate form that sulfur dioxide take in solution is as hydrogen sulfite (bisulfite, HSO<sub>3</sub>—Equation 1)."*
3. *Sulfurous acid may be added with the intention of acidifying the soil, but the production of bioavailable sulfate is an important part of the process, as stated in the TR, lines 154-155: "Sulfite oxidation to sulfate by Thiobacillus bacteria produces bioavailable sulfur for plants." Lines 272-274: "Sulfurous acid contains no persistent substances of record. Hydrogen sulfite present in the solution is metabolized by sulfite reducing bacteria and plants that recycle sulfurous acid into bioavailable sulfur compounds." Lines 438-440 compare it with elemental sulfur: "Elemental sulfur is commonly used to lower soil pH and reclaim soil. It is costly and may require one to seven years for thiobacterial conversion to bioavailable sulfur (Mullen et al., 2007)."*

- **Vinasse** - Due to time constraints the group chose to add a conference call for February 25 (added below), so they would have enough time to devote to a thorough discussion on classification and a proposed guidance listing.
- **Laminarin**. The Chair noted that this material review will be straight forward and the group will complete their work on the next call (Feb 25)
- **Carbon Monoxide**. The members will discuss the TR questions on the Feb 25 call if time allows
- Preliminary workplan discussion for next semester 25<sup>th</sup> - deferred for lack of time
- The meeting was adjourned.

#### **Future Call Schedule:**

January 21, 2014 2:00 ET

Hydrogen chloride TR determination - done

Carbon Monoxide - Determine petition sufficiency and vote (?) Pet suff –done

Discuss annotation for MgO – took straw vote

Discuss Vinasse/vote on classification

2015 sunset materials-review possible questions to include in summary.

February 4, 2014 2:00 ET- call cancelled

NOSB Training meeting in DC

Feb 18, 2014 2:00 ET

Discuss and/or modify any fall 2013 proposals based on public comments

2015 sunset materials (Sodium carbonate peroxyhydrate and aqueous potassium silicate): Review possible questions to include in summary. Determine TR sufficiency

Carbon Monoxide -Discuss TR questions

MgO – vote?

Vinasse edits to proposal/vote on classification

Feb 25, 2014 2:00 ET

Vinasse - discuss proposal edits/vote on classification and proposed guidance listing

Laminarin - proposal review/edits

Carbon Monoxide - discuss TR questions

March 4, 2014 2:00 ET

Discuss allyl isothiocyanate (AITC)

March 18, 2014 2:00 ET

April 1, 2014 2:00 ET

April 15, 2014 2:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Spring 2014 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014

Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday February 25, 2014 2:00 pm ET**

**Present:** Jay Feldman (JFe), Harold Austin (HA), Zea Sonnabend, Chair (ZS), John Foster (JFo), Colehour Bondera (CBo), Jean Richardson (JR) - sitting in, Mac Stone (MS) – sitting in

**Absent:** Carmela Beck (CBe), Francis Thicke (FT), Stacy Jones King (SJK) - on leave

**Staff:** Michelle Arsenault (MA), Lisa Brines (LB)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y 10 25 13  <a href="#">3/2010 TR</a>	<a href="#">Original recomm May 2009</a> Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. TR returned to HS. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y 02 14 13  <a href="#">8/2006 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 205.601(e) and 205.601(i) Original petitions: <a href="#">2004</a> , <a href="#">2006</a>	JFe	Y 02 14 13  <a href="#">9/2003 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014

2016 Sunsets					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<a href="#">2004 TAP</a>  <a href="#">2010 TR</a> <a href="#">2012 TR</a> <a href="#">Supp</a>  No addit TR	Sunset Date: 09 12 16 <a href="#">2003 Petition to add to 205.601</a> <a href="#">2003 Petition supplement</a> <a href="#">2005 NOSB rec (passed)</a>  <a href="#">2009 Petition to remove from 205.601(h)</a> <a href="#">2012 NOSB rec (failed)</a>		Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2003 TAP</a>  Y	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition</a> <a href="#">NOSB rec</a>  Request for Lmted scope TR sent to the NOP 01 21 14. Report is in development and expected mid-May		Summary: Fall 2014 Review: Spr 2015
2017 Sunsets (TR requests due to NOP July 2014)					
Ethanol (Alcohols) 205.601		<a href="#">1995 TAP</a>	TR sent to CS 01 15 14. <b>TR sufficiency due July 15, 2014</b>		
Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
<a href="#">Vinasse</a> - proposal List at §205.601	ZS/N M	<a href="#">08 13 13</a> <a href="#">Expedited,</a> <a href="#">modified TR</a>	Petition sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found suffic 12 03 13	Voted 02 25 14	Proposal Spr 2014
<a href="#">Laminarin</a> List at 205.601	ZS	N	Petition sent to CS on 06 03 13. Sufficiency rspnse due 08 02 13. Petition found sufficient 07 30 13. Determine need for TR. Based on classification vote 12 17 13 the CS determine does not have to be added to the NL. Will send forth a proposal to the full Board.	Classificati on vote: 12 17 13 Voted 02 25 14	Proposal Spr 2014

<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT		Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Petition found suff 01 21 14. CS requested a L'mtd scope TR and posed some specific questions.		TBD
Antibiotics ( <a href="#">Streptomycin</a> ) proposal. Amend annotation, §205.601	ZS/HA	<a href="#">3/2011 TR</a> <a href="#">1/2006 TR</a> <a href="#">10/1995 TAP</a>	<a href="#">Apr 2011 Final Recomm.</a> NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13. Fall 2013 meeting cancelled. Revising based on public comment	08 06 13 Minor revisions 02 18 14 Accepted unanimously	Spr 2014
<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007 Magnesium (HYDR) oxide TR</a>  No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. Fall 2013 meeting cancelled. Based on Straw poll 01 21 14, CS will not revise proposal for Spr 14	08 06 13	Spr 2014
<a href="#">Allyl isothiocyanate (AITC)</a> List at 205.601	HA		Petition sent to CS on 01 22 13. Petition suff due March 22, 2014.		
<b>Inert Ingredients</b>					
<b>Substance</b>	<b>Con-tact</b>	<b>TR reqtd?</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
<b>Other Proposals</b>					
<b>Project</b>	<b>Con-tact</b>	<b>Doc type</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>

Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?
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\* **Yellow highlight** indicates Subcommittee action needed

### Agenda

- Approve Crops Subcommittee notes of February 18, 2014
- **Vinasse** - discuss proposal edits/vote on classification and proposed guidance listing
- **Laminarin** - proposal review/edits, discuss minority opinion
- **Carbon Monoxide** - discuss TR questions
- **Discuss workplan**
- Adjourn

### Discussion

- Crops Subcommittee notes of February 18, 2014 approved with no changes
- **Vinasse** - The CS members discussed the proposal, in which they are proposing an entry for vinasse in the NOP Guidance on Materials for Organic Crops Production (NOP 5034-1) as a natural with a description to clarify which additives are synthetic and prohibited. A member suggested that if the Board does not use its listing authority on §205.602 to control the classification of different vinasse formulations and instead leaves it to the discretion of the USDA, it could result in misuse of this material. The group discussed various scenarios for restricting usage on the National List on §205.601 and §205.602 and concluded that adding restrictive language in the guidance is the best path forward. The NOP agreed, and noted that the purpose of §205.602 is to prohibit natural substances, and this proposal does not do that. A member noted that he finds voting on classification problematic because there are forms of vinasse that are synthetic. The CS Chair noted that they are adding a description to the entry that will address this issue. ZS will add the minority opinion language sent to the group via email, and the Subcommittee moved to a vote on vinasse.

### VOTE on Vinasse

Motion to classify vinasse as non-synthetic

Motion by: ZS

Seconded by: JFo

Discussion: none

Yes: 4 No: 3 Abstain: 0 Absent: 0 Recuse: 0

The vote was left open for 2 missing members and will close Wednesday at close of business Pacific time. Motion carried.

Motion to add the following specific language to the listing of vinasse in the Guidance on Materials for Organic Crops Production (NOP 5034-1): **Vinasse** - may not contain prohibited additives, such as but not limited to, pH adjusters, sanitizers, ammonium compounds, antibiotics or chlorine materials that are not provided for at §205.601. Nitrogen levels may not be fortified.

Motion by: ZS

Seconded by: HA

Discussion: none

Yes: 4 No: 3 Abstain: 0 Absent: 0 Recuse: 0

The vote was left open for 2 missing members and will close Wednesday at close of business Pacific Time. Motion carried.

**ABS note:** The two absent members cast their votes via email on Feb 26, 2014 and the vote tally above was adjusted to reflect this.

**Laminarin** – The group reviewed the latest draft of the proposal and discussed the minority opinion, which was sent via email on February 21, 2014. The members discussed the idea that an extractant is introduced that is not fully removed, and therefore laminarin should be classified as synthetic. Members discussed the context and intended use for which laminarin is being petitioned. Several members noted that laminarin is not being used as an additive, and instead is used as pest control. Additionally, it is used in substantially smaller quantities than in fish products, and does not have a functional effect. A member agreed and emphasized that context, intended use, and amounts are important, and the likelihood for misuse is very small. Especially since cost is a factor and farmers will use only the required amounts. With regard to technical and functional effect, a member felt that sulfur does matter, but the CS Chair noted that it is minor and is already on the National List. The lead reviewer will make some edits, add the minority opinion language, and recirculate the document so the absent members can vote via email.

#### **VOTE on laminarin**

Motion to classify was taken December 17, 2014 and is included below:

Motion by: ZS

Seconded by: HA

Discussion: none

Yes: 5 No: 2 Absent: 0 Abstain: 0 Recuse: 0

The vote will be left open until Close of Business Wednesday

**ABS Note:** The two absent members cast their votes via email and were added to the tally above. Motion carried.

- **Carbon Monoxide** – The lead reviewer was not on the call, so the group briefly discussed the questions for the limited scope TR and will continue to discuss it on the March 4 call.
- **Discuss workplan** - deferred.
- Adjourn

#### **Future Call Schedule:**

Feb 18, 2014 2:00 ET

Discuss and/or modify any fall 2013 proposals based on public comments

2015 sunset materials (Sodium carbonate peroxyhydrate and aqueous potassium silicate): Review possible questions to include in summary. Determine TR sufficiency

Carbon Monoxide -Discuss TR questions

MgO – vote?

Vinasse edits to proposal/vote on classification

Feb 25, 2014 2:00 ET

Vinasse - discuss proposal edits/vote on classification and proposed guidance listing - done

Laminarin - proposal review/edits - done

Carbon Monoxide/Exhaust gas - discuss TR questions –continued on March 4 call

March 4, 2014 2:00 ET

CO/Exhaust gas

Discuss allyl isothiocyanate (AITC)

March 18, 2014 2:00 ET

April 1, 2014 2:00 ET

April 15, 2014 2:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Spring 2014 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday March 4, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Francis Thicke, Vice Chair (FT), Jay Feldman (JFe), Harold Austin (HA), John Foster (JFo), Colehour Bondera (CBo), Carmela Beck (CBe), Mac Stone (MS) - sitting in

**Absent:** Stacy Jones King (SJK) - on leave

**Staff:** Michelle Arsenault (MA), Lisa Brines (LB)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y 10 25 13  <a href="#">3/2010 TR</a>	<a href="#">Original recomm May 2009</a> Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. TR returned to CS. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y 02 14 13  <a href="#">8/2006 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 205.601(e) and 205.601(i) Original petitions: <a href="#">2004</a> , <a href="#">2006</a>	JFe	Y 02 14 13  <a href="#">9/2003 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014

2016 Sunsets					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<a href="#">2004 TAP</a>  <a href="#">2010 TR</a> <a href="#">2012 TR</a> <a href="#">Supp</a>  No addit TR	Sunset Date: 09 12 16 <a href="#">2003 Petition to add to 205.601</a> <a href="#">2003 Petition supplement</a> <a href="#">2005 NOSB rec (passed)</a>  <a href="#">2009 Petition to remove from 205.601(h)</a> <a href="#">2012 NOSB rec (failed)</a>		Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2003 TAP</a>  Y	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition</a> <a href="#">NOSB rec</a>  Request for Lmted scope TR sent to the NOP 01 21 14. Report is in development and expected mid-May		Summary: Fall 2014 Review: Spr 2015
2017 Sunsets (TR requests due to NOP July 2014)					
Ammonium carbonate 205.601(e)		1995	HS: 205.605(b)		Summary: Spr 2015 Review: Fall 2015
Aquatic plant extracts 205.601(j)		2006			“
Arsenic 205.602(b)					“
Ash from manure burning 205.602(a)					“
Boric acid 205.601(e)		1995			“
Calcium hypochlorite 205.601(a)		2011	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)		2011	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)		2011	LS: 205.603(b)		“
Coppers, fixed 205.601(i)		2011			“

Elemental sulfur 205.601(e) 205.601(i) 205.601(j)		1995			“
EPA List 4 - Inerts of Minimal Concern 205.601(m)		None	LS: 205.603(e)		“
Ethanol (Alcohols) 205.601(a)		<a href="#">1995 TAP</a>	TR sent to CS 01 15 14. <a href="#">TR sufficiency due July 15, 2014</a> LS: 205.603(a)		“
Ethylene 205.601(k)		2011	HS: 205.605(b)		“
Herbicides, soap-based 205.601(b)		1996			“
Humic acids 205.601(j)		2006			“
Hydrated lime 205.601(i)		2002	LS: 205.603(b)		“
Hydrogen peroxide 205.601(a) 205.601(i)		1995	HS: 205.605(b) LS: 205.603(a)		“
Isopropanol 205.601(a)			TR in development LS: 205.603(a)		“
Lead salts 205.602(d)					“
Lignin sulfonate 205.601(j) 205.601(l)		2011			“
Lime sulfur 205.601(e) 205.601(i)					“
Liquid fish products 205.601(j)		2006			“
Magnesium sulfate 205.601(j)		2011	HS: 205.605(a) LS: 205.603(a)		“
Microcrystalline cheesewax 205.601(o)					“
Newspaper or other recycled paper 205.601(b) 205.601(c)		2006			“
Oils, horticultural 205.601(e) 205.601(i)		1995			“

Pheromones 205.601(f)		2012			“
Plastic mulch and covers (petroleum- based other than polyvinylchloride (PVC)) 205.601(b)		1995			“
Potassium bicarbonate		1999			“
Potassium chloride 205.602(e)		1995	HS: 205.605(a)		“
Soap-based algicide/demossers 205.601(a)		1994			“
Soaps, ammonium 205.601(d)		1996			“
Soaps, insecticidal 205.601(e)		1994			“
Sodium fluoroaluminate 205.602(f)					“
Sodium hypochlorite 205.601(a)		2011	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)		2011			“
Soluble boron products 205.601(j)		1995			“
Sticky traps/barriers					“
Strychnine 205.602(h)			LS: 205.604(a)		“
Sucrose octanoate esters 205.601(e)		2005	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)		2010			“

Tobacco dust (nicotine sulfate)					“
Vitamin B1 205.601(j)		1995			“
Vitamin C 205.601(j)		1995			“
Vitamin D3 205.601(g)		2011			“
Vitamin E 205.601(j)		1995			“
<b>Petitioned Substances</b>					
<b>Substance</b>	<b>Con- tact</b>	<b>TR requested</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
<a href="#">Vinasse</a> - proposal List at §205.601	ZS/NM	<a href="#">08 13 13 Expedited modified TR</a>	Petitn sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found suffic 12 03 13	Voted 02 25 14	Proposal Spr 2014
<a href="#">Laminarin</a> List at 205.601	ZS	N	Petition sent to CS on 06 03 13. Sufficiency rspnse due 08 02 13. Petition found sufficient 07 30 13. Determine need for TR. Based on classification vote 12 17 13 the CS proposes to not add laminarin to the NL. Will send forth a proposal to the full Board.	Classifica tion vote: 12 17 13  02 25 14	Proposal Spr 2014
<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT		Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Petition found suff 01 21 14. Crafting questions for TR.		TBD
Antibiotics ( <a href="#">Streptomycin</a> ) proposal. Amend annotation, §205.601	ZS/HA	<a href="#">3/2011 TR 1/2006 TR 10/1995 TAP</a>	<a href="#">Apr 2011 Final Recomm.</a> NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13. Fall 2013 meeting cancelled. Revising based on public comment	08 06 13 Minor revisions 02 18 14 Accepted unanimously	Spr 2014

<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007 Magnesium (HYDR) oxide TR</a>  No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. Fall 2013 meeting cancelled. Based on Straw poll 01 21 14, CS will not revise proposal for Spr 14	08 06 13	Spr 2014
<a href="#">Allyl isothiocyanate (AITC)</a> List at 205.601	HA		Petition sent to CS on 01 22 13. Petition suff due March 22, 2014. Petition found sufficient 03 04 14.		TBD
<a href="#">Propylene carbonate</a> 205.601			<a href="#">Notice 11-6: Notice to NL Petitioners, Feb 3, 2011</a>  <a href="#">NOP 5008: Guidance on Reassessed Inert Ingredients (PDF)</a>		
<b>Inert Ingredients</b>					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
<b>Other Proposals</b>					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?

\* **Yellow highlight** indicates Subcommittee action needed

\* **Aqua highlight** indicates multiple NL entries

#### Agenda

- Approve Crops Subcommittee notes of February 25, 2014
- Exhaust gas - discuss TR questions (FT)
- Allyl Isothiocyanate petition sufficiency (HA)
- Discuss workplan items
- Set agenda for upcoming calls
- Adjourn

## Discussion

- Crops Subcommittee notes of February 25, 2014 were approved with minor changes suggested by members during the call. Members discussed formatting of document titles and suggested descriptive names to make it easier to search in emails.
- **Exhaust gas (FT).** Members discussed questions for a new or limited scope TR that were circulated prior to the call. Several of the questions were combined in an effort to shorten the list. The NOP indicated that some of the questions could be consolidated and responded to under the TR evaluation questions. The CS will complete the list of specific questions and forward to the NOP who will then forward them to the contractor.
- **Allyl Isothiocyanate petition sufficiency (AITC) (HA).** AITC is being petitioned for addition to 205.601 as a pre-plant fumigant which the petitioner claims is consistent with organic principles. The CS Chair asked that the wording be changed to “pre-plant synthetic fumigant”. The lead reviewer noted the following: the natural form of AITC is derived from black mustard seed and is listed as a food additive; some confidential business information (CBI) was redacted from the petition and; if label instructions for this substance are followed, EPA considers human exposure to be minimal. The Chair asked that the checklist be populated with information about alternatives, such as mustard seed meal and broccoli, which are often used for this purpose. Members discussed various aspects of the petition, acknowledging that the task at hand is to determine sufficiency. The CS found the petition sufficient and discussed the best path forward for requesting additional information. Options include completing the checklist with the available information, submitting additional questions to the petitioner or requesting a TR. The group discussed the merits of each of these options, and chose to compile a list of questions for a TR. Members felt that a TR would be a more appropriate source for the kinds of questions they would like answered, and if they need to seek further information, they could ask the petitioner. In particular they would like more information about the manufacturing process, some of which may be CBI. A member noted that although a TR would provide information regarding safety of the material, it cannot answer questions about essentiality, and the group would like to know if organic farmers have a need for this substance.
- **Discuss workplan items.**
  - The CS Chair will send the 2017 Crops Sunset list to the Subcommittee members and they will discuss it and assign reviewers on the March 18 call.
  - The CS will request a TR for exhaust gas.
  - Contamination Issues in Farm Inputs Literature Review. This topic will likely be ready to discuss at the fall 2014 NOSB meeting.
- **Future call agenda.** The presenters have already been assigned for the spring 2014 NOSB meeting proposals. The members will review public comments on April 1 and 15.
- **The meeting was adjourned**

## Future Call Schedule:

Feb 25, 2014 2:00 ET

Vinasse - discuss proposal edits/vote on classification and proposed guidance listing

Laminarin - proposal review/edits

Carbon Monoxide - discuss TR questions

March 4, 2014 2:00 ET

Exhaust gas (Carbon Monoxide)

Discuss allyl isothiocyanate (AITC)

March 18, 2014 2:00 ET

Discuss TR questions for allyl isothiocyanate (AITC)

2017 Sunset list - assign reviewers

Contamination Issues in Farm Inputs Literature Review

April 1, 2014 2:00 ET

Review Public comments

April 15, 2014 2:00 ET  
Review Public comments

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Spring 2014 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday March 18, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Francis Thicke, Vice Chair (FT), Jay Feldman (JFe), Harold Austin (HA), Colehour Bondera (CBo), Carmela Beck (CBe), Mac Stone (MS) - sitting in

**Absent:** John Foster (JFo), Stacy Jones King (SJK) - on leave

**Staff:** Michelle Arsenault (MA), Lisa Brines (LB)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y 10 25 13  <a href="#">3/2010 TR</a>	<a href="#">Original recomm May 2009</a> Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. TR returned to CS. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y 02 14 13  <a href="#">8/2006 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 205.601(e) and 205.601(i) Original petitions: <a href="#">2004</a> , <a href="#">2006</a>	JFe	Y 02 14 13  <a href="#">9/2003 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014

2016 Sunsets					
Substance	Contact	TR requested	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<a href="#">2004 TAP</a>  <a href="#">2010 TR</a> <a href="#">2012 TR</a> <a href="#">Supp</a>  No addit TR	Sunset Date: 09 12 16 <a href="#">2003 Petition to add to 205.601</a> <a href="#">2003 Petition supplement</a> <a href="#">2005 NOSB rec (passed)</a>  <a href="#">2009 Petition to remove from 205.601(h)</a> <a href="#">2012 NOSB rec (failed)</a>		Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2003 TAP</a>  Y	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition</a> <a href="#">NOSB rec</a>  Request for Lmted scope TR sent to the NOP 01 21 14. Report is in development and expected mid-May		Summary: Fall 2014 Review: Spr 2015
Petitioned Substances					
Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Vinasse</a> - proposal List at §205.601	ZS/NM	<a href="#">08 13 13</a> <a href="#">Expedited</a> <a href="#">modified</a> <a href="#">TR</a>	Petitn sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found suffic 12 03 13	Voted 02 25 14	Proposal Spr 2014
<a href="#">Laminarin</a> List at 205.601	ZS	N	Petition sent to CS on 06 03 13. Sufficiency rspnse due 08 02 13. Petition found sufficient 07 30 13. Determine need for TR. Based on classification vote 12 17 13 the CS proposes to not add laminarin to the NL. Will send forth a proposal to the full Board.	Classifica tion vote: 12 17 13  02 25 14	Proposal Spr 2014
<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT		Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Petition found suff 01 21 14. Crafting questions for TR.		TBD

Antibiotics ( <a href="#">Streptomycin</a> ) proposal. Amend annotation, §205.601	ZS/HA	<a href="#">3/2011 TR</a> <a href="#">1/2006</a> <a href="#">TR</a> <a href="#">10/1995</a> <a href="#">TAP</a>	<a href="#">Apr 2011 Final Recomm.</a> NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13. Fall 2013 meeting cancelled. Revising based on public comment	08 06 13 Minor revisions 02 18 14 Accepted unanimously	Spr 2014
<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007</a> <a href="#">Magnesium (HYDR)</a> <a href="#">oxide TR</a>  No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. Fall 2013 meeting cancelled. Based on Straw poll 01 21 14, CS will not revise proposal for Spr 14	08 06 13	Spr 2014
<a href="#">Allyl isothiocyanate</a> (AITC) List at 205.601	HA		Petition sent to CS on 01 22 13. Petition suff due March 22, 2014. Petition found sufficient 03 04 14. TR request sent to NOP 03 18 14		TBD
<a href="#">Propylene carbonate</a> 205.601			<a href="#">Notice 11-6: Notice to NL Petitioners,</a> <a href="#">Feb 3, 2011</a>  <a href="#">NOP 5008: Guidance on Reassessed Inert</a> <a href="#">Ingredients (PDF)</a>		
<b>Inert Ingredients</b>					
<b>Substance</b>	<b>Con- tact</b>	<b>TR reqtd?</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
<b>Other Proposals</b>					
<b>Project</b>	<b>Con- tact</b>	<b>Doc type</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?

\* **Yellow highlight** indicates Subcommittee action needed

## Agenda

- Approve notes from March 4
- Discuss and finalize TR questions for AITC
- Review Contamination Issues workplan
- 2017 Sunset list reviewer assignments

## Discussion

- **Crops Subcommittee notes** of March 4, 2014 were approved with no changes.
- **Allyl Isothiocyanate petition sufficiency (AITC) (HA).** Members discussed questions that the lead reviewer circulated prior to the call. The group made some edits and composed additional questions for clarity. HA will craft the new language and send it to the group after the call for review.
- **Review Contamination Issues workplan item.** The members discussed the draft document and discussed how to move forward, noting that the NOP already approved this phase of the project. A member complimented the lead reviewer on the content and organization of the document. The current version is composed of two components: justification for why the Crops Subcommittee/NOSB should undertake this project, and background research and baseline information. A member envisions this going forth as either a report or a discussion document, with the emphasis on the need to collect public comment and expert testimony. The group discussed the identification of experts to participate in conversations with the Subcommittee and/or Board. The CS Chair noted that a framework and targeted questions should be developed first before asking experts to consult, which will help them identify the appropriate expertise. JFe will draft the framework and questions, and offered a target date of May 20, 2014, in an effort to have a document ready for the fall 2014 NOSB meeting. The NOP asked the group to also include information about goals for this project, including language about the urgency and scale. The NOP also suggested that it might be helpful to review §205.203 of the National List as a guide when writing this document.
- **2017 Sunset list reviewer assignments.** Reviewer assignments were completed and will be maintained on a separate Excel Spreadsheet, as it is very long. The Chair asked that the table be removed from above and instead be added and updated as materials are reviewed. MA has moved the table to the end of this document for now.
- **The meeting was adjourned**

## [Previous CS Notes](#)

### Future Call Schedule:

March 4, 2014 2:00 ET

Exhaust gas (Carbon Monoxide)  
Discuss allyl isothiocyanate (AITC)

March 18, 2014 2:00 ET

Discuss TR questions for allyl isothiocyanate (AITC)  
2017 Sunset list - assign reviewers  
Contamination Issues in Farm Inputs Literature Review

April 1, 2014 2:00 ET

Presentations -identify presenters and format for spring 2014 meeting  
Review Public comments

April 15, 2014 2:00 ET

Review Public comments

May 20, 2014 2:00 ET

Contamination Issues in Farm Inputs

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Spring 2014 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

\* Aqua highlight indicates multiple NL entries

2017 Sunsets (TR requests due to NOP July 2014)					
Ammonium carbonate 205.601(e)	CBo	1995	HS: 205.605(b) - leavening agent		Summary: Spr 2015 Review: Fall 2015
Aquatic plant extracts 205.601(j)	CBe	2006			“
Arsenic 205.602(b)	JFe				“
Ash from manure burning 205.602(a)	JFe				“
Boric acid 205.601(e)	CBo	1995			“
Calcium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011			“

Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995			“
EPA List 4 - Inerts of Minimal Concern 205.601(m)	JFe	None	LS: 205.603(e)		“
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>	TR sent to CS 01 15 14. <b>TR sufficiency due July 15, 2014</b> LS: 205.603(a)		“
Ethylene 205.601(k)	JFe	2011	HS: 205.605(b) – postharvest ripening and degreening		“
Herbicides, soap-based 205.601(b)	FT	1996			“
Humic acids 205.601(j)	CBe	2006			“
Hydrated lime 205.601(i)	ZS	2002	LS: 205.603(b)		“
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995	HS: 205.605(b) LS: 205.603(a)		“
Isopropanol 205.601(a)	FT		TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe				“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011			“
Lime sulfur 205.601(e) 205.601(i)	HA				“
Liquid fish products 205.601(j)	CBe	2006			“
Magnesium sulfate 205.601(j)	CBe	2011	HS: 205.605(a) LS: 205.603(a)		“
Microcrystalline cheesewax 205.601(o)	CBo				“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995			“

Pheromones 205.601(f)	HA	2012			“
Plastic mulch and covers (petroleum- based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995			“
Potassium bicarbonate	JFe	1999			“
Potassium chloride 205.602(e)	ZS	1995	HS: 205.605(a)		“
Soap-based algicide/demossers 205.601(a)	FT	1994			“
Soaps, ammonium 205.601(d)	FT	1996			“
Soaps, insecticidal 205.601(e)	JFo	1994			“
Sodium fluoaluminate 205.602(f)	JFo				“
Sodium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011			“
Soluble boron products 205.601(j)	CBe	1995			“
Sticky traps/barriers	CBo				“
Strychnine 205.602(h)	JFe		LS: 205.604(a)		“
Sucrose octanoate esters 205.601(e)	JFo	2005	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010			“

Tobacco dust (nicotine sulfate) 205.602(i)	JFe				“
Vitamin B1 205.601(j)	CBe	1995			“
Vitamin C 205.601(j)	CBe	1995			“
Vitamin D3 205.601(g)	JFo	2011			“
Vitamin E 205.601(j)	CBe	1995			“

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday April 1, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Jay Feldman (JFe), Harold Austin (HA), John Foster (JFo), Colehour Bondera (CBo), Mac Stone (MS) - sitting in

**Absent:** Francis Thicke, Vice Chair (FT), Carmela Beck (CBe), Stacy Jones King (SJK) - on leave

**Staff:** Michelle Arsenault (MA), Lisa Brines (LB)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y 10 25 13  <a href="#">3/2010 TR</a>	<a href="#">Original recomm May 2009</a> Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. TR returned to CS. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y 02 14 13  <a href="#">8/2006 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 205.601(e) and 205.601(i) Original petitions: <a href="#">2004</a> , <a href="#">2006</a>	JFe	Y 02 14 13  <a href="#">9/2003 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014

2016 Sunsets					
Substance	Contact	TR requested	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<a href="#">2004 TAP</a>  <a href="#">2010 TR</a> <a href="#">2012 TR</a> <a href="#">Supp</a>  No addit TR	Sunset Date: 09 12 16 <a href="#">2003 Petition to add to 205.601</a> <a href="#">2003 Petition supplement</a> <a href="#">2005 NOSB rec (passed)</a>  <a href="#">2009 Petition to remove from 205.601(h)</a> <a href="#">2012 NOSB rec (failed)</a>		Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2003 TAP</a>  Y	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition</a> <a href="#">NOSB rec</a>  Request for Lmted scope TR sent to the NOP 01 21 14. Report is in development and expected mid-May		Summary: Fall 2014 Review: Spr 2015
Petitioned Substances					
Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Vinasse</a> - proposal List at §205.601	ZS	<a href="#">08 13 13</a> <a href="#">Expedited</a> <a href="#">modified</a> <a href="#">TR</a>	Petitn sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found suffic 12 03 13	Voted 02 25 14	Proposal Spr 2014
<a href="#">Laminarin</a> List at 205.601	ZS	N	Petition sent to CS on 06 03 13. Sufficiency rspnse due 08 02 13. Petition found sufficient 07 30 13. Determine need for TR. Based on classification vote 12 17 13 the CS proposes to not add laminarin to the NL. Will send forth a proposal to the full Board.	Classifica tion vote: 12 17 13  02 25 14	Proposal Spr 2014
<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT	Y	Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Petition found suff 01 21 14. TR request sent to NOP.		TBD

Antibiotics ( <a href="#">Streptomycin</a> ) proposal. Amend annotation, §205.601	ZS/HA	<a href="#">3/2011 TR</a> <a href="#">1/2006</a> <a href="#">TR</a> <a href="#">10/1995</a> <a href="#">TAP</a>	<a href="#">Apr 2011 Final Recomm.</a> NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13. Fall 2013 meeting cancelled. Revising based on public comment	08 06 13 Minor revisions 02 18 14 Accepted unanimously	Spr 2014
<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007</a> <a href="#">Magnesium (HYDR)</a> <a href="#">oxide TR</a>  No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. Fall 2013 meeting cancelled. Based on Straw poll 01 21 14, CS will not revise proposal for Spr 14	08 06 13	Spr 2014
<a href="#">Allyl isothiocyanate</a> ( <a href="#">AITC</a> ) List at 205.601	HA	Y	Petition sent to CS on 01 22 13. Petition suff due March 22, 2014. Petition found sufficient 03 04 14. TR request sent to NOP.		TBD
<b>Inert Ingredients</b>					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
<a href="#">Propylene carbonate</a> 205.601			<a href="#">Notice 11-6: Notice to NL Petitioners, Feb 3, 2011</a>  <a href="#">NOP 5008: Guidance on Reassessed Inert Ingredients (PDF)</a>		
<b>Other Proposals</b>					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?

\* **Yellow highlight** indicates Subcommittee action needed

## Agenda

- Approve notes from March 18
- Presentations - identify presenters and format for spring 2014 meeting
- Review Public comments

## Discussion

- **Crops Subcommittee notes** of March 18, 2014 were approved with no changes.
- **Spring 2014 proposals presentations.** The members discussed who will present what at the Spring NOSB meeting. HA will present a brief summary of the streptomycin proposal and associated public comments, from both the fall and spring submissions. FT will present the Magnesium Oxide proposal. ZS will present both Laminarin and Vinasse. JFe will present Aqueous Potassium Silicate. CBo will present Sulfurous Acid. The three 2015 Sunset materials will be presented by their respective reviewers as indicated in the table above. The group will discuss the public comments on the next call, April 15.
- **2017 Sunset list - assign reviewers.** The CS Chair asked that on the April 15 call the group be prepared to sketch out a timeline for the 2017 Sunset materials reviews so they can determine the need for TRs, ahead of the July deadline. The NOP noted that as the July deadline approaches, we will have a better idea of the resources available for TRs, and that the CS should allow time for prioritization in case NOP can't develop all Sunset TRs requested.
- **The meeting was adjourned**

## Previous CS Notes

### Future Call Schedule:

March 18, 2014 2:00 ET

Discuss TR questions for allyl isothiocyanate (AITC)

2017 Sunset list - assign reviewers

Contamination Issues in Farm Inputs Literature Review

April 1, 2014 2:00 ET

Presentations - identify presenters and format for spring 2014 meeting

Review Public comments

April 15, 2014 2:00 ET

Review Public comments

Schedule review timeline for 2017 Sunset materials.

May 20, 2014 2:00 ET

Contamination Issues in Farm Inputs

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Spring 2014 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014

NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

\* Aqua highlight indicates multiple NL entries

#### 2017 Sunsets (TR requests due to NOP July 2014)

Ammonium carbonate 205.601(e)	CBo	1995	HS: 205.605(b) - leavening agent		Summary: Spr 2015 Review: Fall 2015
Aquatic plant extracts 205.601(j)	CBe	2006			“
Arsenic 205.602(b)	JFe				“
Ash from manure burning 205.602(a)	JFe				“
Boric acid 205.601(e)	CBo	1995			“
Calcium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995			“
EPA List 4 - Inerts of Minimal Concern 205.601(m)	JFe	None	LS: 205.603(e)		“
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014 LS: 205.603(a)		“
Ethylene 205.601(k)	JFe	2011	HS: 205.605(b) – postharvest ripening and degreening		“

Herbicides, soap-based 205.601(b)	FT	1996			“
Humic acids 205.601(j)	CBe	2006			“
Hydrated lime 205.601(i)	ZS	2002	LS: 205.603(b)		“
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995	HS: 205.605(b) LS: 205.603(a)		“
Isopropanol 205.601(a)	FT		TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe				“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011			“
Lime sulfur 205.601(e) 205.601(i)	HA				“
Liquid fish products 205.601(j)	CBe	2006			“
Magnesium sulfate 205.601(j)	CBe	2011	HS: 205.605(a) LS: 205.603(a)		“
Microcrystalline cheesewax 205.601(o)	CBo				“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995			“
Pheromones 205.601(f)	HA	2012			“
Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995			“
Potassium bicarbonate	JFe	1999			“
Potassium chloride 205.602(e)	ZS	1995	HS: 205.605(a)		“

Soap-based algicide/demossers 205.601(a)	FT	1994			“
Soaps, ammonium 205.601(d)	FT	1996			“
Soaps, insecticidal 205.601(e)	JFo	1994			“
Sodium fluoaluminate 205.602(f)	JFo				“
Sodium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011			“
Soluble boron products 205.601(j)	CBe	1995			“
Sticky traps/barriers	CBo				“
Strychnine 205.602(h)	JFe		LS: 205.604(a)		“
Sucrose octanoate esters 205.601(e)	JFo	2005	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010			“
Tobacco dust (nicotine sulfate) 205.602(i)	JFe				“
Vitamin B1 205.601(j)	CBe	1995			“
Vitamin C 205.601(j)	CBe	1995			“
Vitamin D3 205.601(g)	JFo	2011			“
Vitamin E 205.601(j)	CBe	1995			“

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday April 15, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Jay Feldman (JFe), Harold Austin (HA), John Foster (JFo), Colehour Bondera (CBo), Carmela Beck (CBe),

**Absent:** Francis Thicke, Vice Chair (FT)

**Staff:** Michelle Arsenault (MA), Stacy Jones King (SJK)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y 10 25 13  <a href="#">3/2010 TR</a>	<a href="#">Original recomm May 2009</a> Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. TR returned to CS. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y 02 14 13  <a href="#">8/2006 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 205.601(e) and 205.601(i) Original petitions: <a href="#">2004</a> , <a href="#">2006</a>	JFe	Y 02 14 13  <a href="#">9/2003 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014

2016 Sunsets					
Substance	Contact	TR requested	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<a href="#">2004 TAP</a>  <a href="#">2010 TR</a> <a href="#">2012 TR</a> <a href="#">Supp</a>  No addit TR	Sunset Date: 09 12 16 <a href="#">2003 Petition to add to 205.601</a> <a href="#">2003 Petition supplement</a> <a href="#">2005 NOSB rec (passed)</a>  <a href="#">2009 Petition to remove from 205.601(h)</a> <a href="#">2012 NOSB rec (failed)</a>		Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2003 TAP</a>  Y	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition</a> <a href="#">NOSB rec</a>  Request for Lmted scope TR sent to the NOP 01 21 14. Report is in development and expected mid-May		Summary: Fall 2014 Review: Spr 2015
Petitioned Substances					
Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Vinasse</a> - proposal List at §205.601	ZS	<a href="#">08 13 13</a> <a href="#">Expedited</a> <a href="#">modified</a> <a href="#">TR</a>	Petitn sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found suffic 12 03 13	Voted 02 25 14	Proposal Spr 2014
<a href="#">Laminarin</a> List at 205.601	ZS	N	Petition sent to CS on 06 03 13. Sufficiency rspnse due 08 02 13. Petition found sufficient 07 30 13. Determine need for TR. Based on classification vote 12 17 13 the CS proposes to not add laminarin to the NL. Will send forth a proposal to the full Board.	Classifica tion vote: 12 17 13  02 25 14	Proposal Spr 2014
<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT	Y	Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Petition found suff 01 21 14. TR request sent to NOP.		TBD

Antibiotics ( <a href="#">Streptomycin</a> ) proposal. Amend annotation, §205.601	ZS/HA	<a href="#">3/2011 TR</a> <a href="#">1/2006</a> <a href="#">TR</a> <a href="#">10/1995</a> <a href="#">TAP</a>	<a href="#">Apr 2011 Final Recomm.</a> NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13. Fall 2013 meeting cancelled. Revising based on public comment	08 06 13 Minor revisions 02 18 14 Accepted unanimously	Spr 2014
<a href="#">Magnesium oxide</a> List at 205.601	FT	<a href="#">2007</a> <a href="#">Magnesium (HYDR)</a> <a href="#">oxide TR</a> No new TR request	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested. Fall 2013 meeting cancelled. Fall 2013 meeting cancelled. Based on Straw poll 01 21 14, CS will not revise proposal for Spr 14	08 06 13	Spr 2014
<a href="#">Allyl isothiocyanate</a> (AITC) List at 205.601	HA	Y	Petition sent to CS on 01 22 13. Petition suff due March 22, 2014. Petition found sufficient 03 04 14. TR request sent to NOP.		TBD

#### Inert Ingredients

Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Verbal report Spr 2014
<a href="#">Propylene carbonate</a> 205.601			<a href="#">Notice 11-6: Notice to NL Petitioners, Feb 3, 2011</a>  <a href="#">NOP 5008: Guidance on Reassessed Inert Ingredients (PDF)</a>		

#### Other Proposals

Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?

\* **Yellow highlight** indicates Subcommittee action needed

#### Agenda

- Approve notes from April 1, 2014
- Review Public comments
- Schedule review timeline for 2017 Sunset materials.

## Discussion

- **Crops Subcommittee notes** April 1, 2014 were approved with no changes.
- **Public Comments**
  - Streptomycin - The spring comments were very similar to the fall 2013 comments. The majority of commenters are in support of removing Streptomycin from the list.
  - MgO - The fall and spring comments were very similar. Some commenters were against listing MgO and some favored the minority opinion of adding a 5- year expiration date. A member noted the lack of comments from growers as well as comments that humates are possibly being used as a crutch, although there was no evidence to support this claim.
  - Vinasse - The members felt the comments about vinasse were very helpful: Material Review Organizations and groups that represent them are in support of the proposal and noted that MROs are able to make a classification determination to determine what is or isn't synthetic. The community is urging the NOP to finalize the classification guidance document as the NOSB is relying on the draft guidance for their review. Some reviewers suggested an annotation change, which could amount to a substantive change. The group discussed the possibilities of annotating the listing including specifying the non-synthetic variations of vinasse in the classification motion. A member cautioned that adding complexity and conditions to the motion after the Subcommittee voted is not a good tact to take unless this new annotation is solely for clarification. The CS Chair feels that it would be better to be more explicit in the motion because the synthetic and non-synthetic versions of vinasse have the same name. Then the ACAs would be responsible for making the determination. The NOP will provide feedback to the NOSB on how to proceed and if they feel it's a substantive change the vote will be deferred to the fall 2014 meeting.
  - Laminarin - Two Material Review Organizations (MROs) supported the proposal in general but sought more guidance on its classification. Some commenters felt that the CS should get a technical review, which may change the classification of non-synthetic. One member supported the comments about laminarin containing an 'impurity' and the assertion that it should not be allowed on the permitted substances list without a review. The CS Chair will summarize the public comments at the meeting but the group will leave the proposal as is, unless someone in the majority is concerned by the comments that recommended a TR and more guidance. The CS chair stated that if the motion for a nonsynthetic designation at the Board level fails then the CS will request a TR.
  - Sulfurous acid - Most of the fall 2013 comments, with a few exceptions, were in opposition to relisting this material, whereas the spring 2014 comments supported the proposal.
  - Sodium carbonate peroxyhydrate (SCP) - The group feels that the current annotation is confusing, inaccurate and does not belong, and therefore needs to be removed, even though there's not a clear process for doing that. For spring 2014 the CS Chair will provide a summary of this material and will then explore the process for changing the annotation. Additionally, the CS would like to get some clarity from the NOP about the process for annotation changes. A member asked about this material as an alternative to Copper Sulfate.
  - Aqueous potassium silicate (APS) - The NOSB received several comments about this material but only two were substantive and referenced the TR.
- Members scheduled the review timeline for 2017 Sunset materials. See below.
- **The meeting was adjourned**

[Previous CS Notes](#)

**Future Call Schedule:**

April 1, 2014 2:00 ET

Presentations - identify presenters and format for spring 2014 meeting

Review Public comments

April 15, 2014 2:00 ET

Review Public comments

Schedule review timeline for 2017 Sunset materials.

May 20, 2014 2:00 ET

Contamination Issues in Farm Inputs

2017 ZS

June 3, 2014 2:00 ET

2017 Sunsets CBo

2017 HA

June 17, 2014 2:00 ET

2017 All JFe

2017Cbe

2017 JFo

2017 HA

July 1, 2014 2:00 ET

2017 FT

2017 CBe

2017 JFo

July 15, 2014 2:00 ET

Aug 5, 2014 2:00 ET

Aug 19, 2014 2:00 ET

Sep 2, 2014 2:00 ET

Sep 16, 2014 2:00 ET

Oct 7, 2014 2:00 ET

Oct 21, 2014 2:00 ET

Nov 4, 2014 2:00 ET

Nov 18, 2014 2:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Spring 2014 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014

Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

### 2017 Sunsets (TR requests due to NOP July 2014)

Substance	Contact	TR	Misc notes	ote	Meeting
Ammonium carbonate 205.601(e)	CBo	1995	HS: 205.605(b) - leavening agent		Summary: Spr 2015 Review: Fall 2015
Aquatic plant extracts 205.601(j)	CBe	2006			“
Arsenic 205.602(b)	JFe				“
Ash from manure burning 205.602(a)	JFe				“
Boric acid 205.601(e)	CBo	1995			“
Calcium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995			“
EPA List 4 - Inerts of Minimal Concern 205.601(m)	JFe	None	LS: 205.603(e)		“
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014 LS: 205.603(a)		“
Ethylene 205.601(k)	JFe	2011	HS: 205.605(b) – postharvest ripening and degreening		“
Herbicides, soap-based 205.601(b)	FT	1996			“

Humic acids 205.601(j)	CBe	2006			“
Hydrated lime 205.601(i)	ZS	2002	LS: 205.603(b)		“
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995	HS: 205.605(b) LS: 205.603(a)		“
Isopropanol 205.601(a)	FT		TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe				“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011			“
Lime sulfur 205.601(e) 205.601(i)	HA				“
Liquid fish products 205.601(j)	CBe	2006			“
Magnesium sulfate 205.601(j)	CBe	2011	HS: 205.605(a) LS: 205.603(a)		“
Microcrystalline cheesewax 205.601(o)	CBo				“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995			“
Pheromones 205.601(f)	HA	2012			“
Plastic mulch and covers (petroleum- based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995			“
Potassium bicarbonate	JFe	1999			“
Potassium chloride 205.602(e)	ZS	1995	HS: 205.605(a)		“
Soap-based algicide/demossers 205.601(a)	FT	1994			“

Soaps, ammonium 205.601(d)	FT	1996			“
Soaps, insecticidal 205.601(e)	JFo	1994			“
Sodium fluoroaluminate 205.602(f)	JFo				“
Sodium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011			“
Soluble boron products 205.601(j)	CBe	1995			“
Sticky traps/barriers	CBo				“
Strychnine 205.602(h)	JFe		LS: 205.604(a)		“
Sucrose octanoate esters 205.601(e)	JFo	2005	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010			“
Tobacco dust (nicotine sulfate) 205.602(i)	JFe				“
Vitamin B1 205.601(j)	CBe	1995			“
Vitamin C 205.601(j)	CBe	1995			“
Vitamin D3 205.601(g)	JFo	2011			“
Vitamin E 205.601(j)	CBe	1995			“

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Crops Subcommittee (CS) Meeting Notes  
Tuesday May 20, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Francis Thicke, Vice Chair (FT), Jay Feldman (JFe), Harold Austin (HA), John Foster (JFo), Colehour Bondera (CBo), Carmela Beck (CBe)

**Absent:** none

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y 10 25 13  <a href="#">3/2010 TR</a>	<a href="#">Original recomm May 2009</a> Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. TR returned to CS. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y 02 14 13  <a href="#">8/2006 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 205.601(e) and 205.601(i) Original petitions: <a href="#">2004</a> , <a href="#">2006</a>	JFe	Y 02 14 13  <a href="#">9/2003 TR</a>	<a href="#">Original recomm Nov 2007</a> Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13. Revised TR sent to CS 01 15 14. TR suff due 02 15 14. TR found suffic 02 18 14. CS will add question to sunset listing	NA	Summary: Spr 2014 Review: Fall 2014

2016 Sunsets					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<a href="#">2004 TAP</a>  <a href="#">2010 TR</a> <a href="#">2012 TR</a> <a href="#">Supp</a>  No addit TR	Sunset Date: 09 12 16 <a href="#">2003 Petition to add to 205.601</a> <a href="#">2003 Petition supplement</a> <a href="#">2005 NOSB rec (passed)</a>  <a href="#">2009 Petition to remove from 205.601(h)</a> <a href="#">2012 NOSB rec (failed)</a>		Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2003 TAP</a>  Y	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition</a> <a href="#">NOSB rec</a>  Request for Lmt'd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. <b>Sufficiency due 07 16 14</b>		Summary: Fall 2014 Review: Spr 2015
Petitioned Substances					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13. Determine need for TR. Based on classification vote 12 17 13 the CS proposes to not add laminarin to the NL. Returned to CS after Apr 2014 meeting, will request Lmt'd scope TR for further review.		TBD
<a href="#">Carbon monoxide (exhaust gas)</a> List at §205.601	FT	Y	Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Petition found suff 01 21 14. TR request sent to NOP.		Fall 2014
<a href="#">Allyl isothiocyanate (AITC)</a> List at 205.601	HA	Y	Petition sent to CS on 01 22 13. Petition suff due March 22, 2014. Petition found sufficient 03 04 14. TR request sent to NOP.		TBD
Inert Ingredients					

Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Report fall 2014
<a href="#">Propylene carbonate</a> 205.601			<a href="#">Notice 11-6: Notice to NL Petitioners, Feb 3, 2011</a>  <a href="#">NOP 5008: Guidance on Reassessed Inert Ingredients (PDF)</a>		TBD
<b>Other Proposals</b>					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Disc doc Fall 2014

\* **Yellow highlight** indicates Subcommittee action needed

### Agenda

- Approve notes from April 15, 2014
- Welcome Emily to Crops Subcommittee!
- Next steps for Laminarin (ZS)
- Contamination Issues in Farm Inputs (JFe) - progress report
- Confirm remaining summer schedule (including assign date for Hydrogen Chloride TR review)
- 2017 Sunsets (ZS)

### Discussion

- **Crops Subcommittee notes** April 15, 2014 were approved with a minor correction to the section on streptomycin and some minor language edits.
- **Next steps for Laminarin (ZS)** - ZS will compile some questions for a TR and circulate for discussion on June 3. After the group reviews the questions they will be able to determine whether they will request a full TR or a limited scope one.
- **Contamination Issues in Farm Inputs (JFe) - progress report.** The document was structured as discussion document and the members discussed scheduling experts to join the CS calls to discuss this further. Included in this document, but beyond the current scope, is a longer term timeline for this work. The group envisions the following timeline: a discussion document for fall 2014, a proposal in spring 2015, and perhaps fall 2015 as well. The CS Chair indicated that the discussion document should include the results of the literature review, information gleaned from the experts, and targeted questions for the community. The lead reviewer requested input regarding experts to invite and will

begin the draft literature review for circulation prior to the next call. The discussion was added to the schedule below for June 3.

- **Confirm remaining summer schedule** - The discussion to determine the TR sufficiency for Hydrogen Chloride was scheduled for June 3 (see below).
- **2017 Sunsets (ZS). ZS circulated a spreadsheet to the group with several 2017 sunset materials under review. She noted the difficulty in finding some of the old documents and provided the following for group discussion:**
  - Copper sulfate: Still trying to locate previous discussions, but is inclined to not request a new TR since the last one was recent (2011).
  - Hydrated lime: Listed as lime, hydrated. Found the 2002 TR useful but it was reviewed for a different use (soil amendment), and as a solo material. It is used by itself and in combination with other materials for disease control.
  - Hydrogen peroxide: No listing in petitioned substance database (1995). Well known and widely used, so the lead reviewer is recommending the CS not request a new TR. However, she will review this more thoroughly and present it for discussion again.
  - Potassium chloride. No listing in the petitioned substance database, but found a 1995 TAP review. This material has alternatives, and a former Board requested a petition to remove it from the list. The CS is waiting to hear from the NOP about alternatives for removal. The CS may request a limited scope TR.
  - The CS Chair urged the members to add notes to their reviews indicating the sources and locations of the past information, to aid the other members and future Boards with their reviews. In support of this, the Chair forwarded a list to the NOP indicating which information is missing and/or needs cross referencing or linking. ZS located all of the Committee reviews for the 2016 HS substances and will send to the Chair of the HS.
- **The meeting was adjourned**

#### [Previous CS Notes](#)

#### **Future Call Schedule:**

April 15, 2014 2:00 ET

Review Public comments

Schedule review timeline for 2017 Sunset materials.

May 20, 2014 2:00 ET

Contamination Issues in Farm Inputs

2017 Sunsets (ZS)

June 3, 2014 2:00 ET

Next steps for Laminarin

Discuss draft for Contamination Issues in Farm Inputs

2017 Sunsets (CBo)

2017 Sunsets (HA)

TR sufficiency on Hydrogen chloride 2016 (JFo)

June 17, 2014 2:00 ET

2017 Sunsets All (JFe)

2017 Sunsets (CBe)

2017 Sunsets (JFo) - TR

2017 Sunsets (HA)

July 1, 2014 2:00 ET

2017 Sunsets (FT)

2017 Sunsets (CBe)

2017 Sunsets (JFo)

July 15, 2014 2:00 ET

Aug 5, 2014 2:00 ET

2016 Sunset reviews: (Sulf acid, SCP, APS) using new template.

Aug 19, 2014 2:00 ET

Sep 2, 2014 2:00 ET

Sep 16, 2014 2:00 ET

Oct 7, 2014 2:00 ET

Oct 21, 2014 2:00 ET

Nov 4, 2014 2:00 ET

Nov 18, 2014 2:00 ET

Fall 2014 Milestones	Target date
NOSB Subcommittee requests technical reports for Sunset 2017 substances	Jul 15, 2014
NOP - Complete tentative agenda	Aug 7, 2014
NOSB - Fall 2014 proposals due to NOP	Aug 27, 2014
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2014
NOSB Subcommittees - submit tentative workplans to NOP	Sept 11, 2014
Discuss workplans on ES call	Sept 12, 2014
Public comment closes	Oct 7, 2014
Workplans finalized on ES call (last call before fall mtg)	Oct 17, 2014
NOP - Send compiled public comments to NOSB	Oct 13, 2014
Fall 2014 NOSB Meeting – Louisville, KY	Oct 27 - Oct 31

2017 Sunsets (TR requests due to NOP July 2014)					
Substance	Contact	TR	Misc notes	Vote	Meeting
Ammonium carbonate 205.601(e)	CBo	1995	HS: 205.605(b) - leavening agent		Summary: Spr 2015 Review: Fall 2015
Aquatic plant extracts 205.601(j)	CBe	2006			“
Arsenic 205.602(b)	JFe				“
Ash from manure burning 205.602(a)	JFe				“
Boric acid 205.601(e)	CBo	1995			“
Calcium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“

Chlorine dioxide 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995			“
EPA List 4 - Inerts of Minimal Concern 205.601(m)	JFe	None	LS: 205.603(e)		“
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014 LS: 205.603(a)		“
Ethylene 205.601(k)	JFe	2011	HS: 205.605(b) – postharvest ripening and degreening		“
Herbicides, soap- based 205.601(b)	FT	1996			“
Humic acids 205.601(j)	CBe	2006			“
Hydrated lime 205.601(i)	ZS	2002	LS: 205.603(b)		“
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995	HS: 205.605(b) LS: 205.603(a)		“
Isopropanol 205.601(a)	FT		TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe				“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011			“
Lime sulfur 205.601(e) 205.601(i)	HA				“
Liquid fish products 205.601(j)	CBe	2006			“
Magnesium sulfate 205.601(j)	CBe	2011	HS: 205.605(a) LS: 205.603(a)		“
Microcrystalline cheesewax 205.601(o)	CBo				“

Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995			“
Pheromones 205.601(f)	HA	2012			“
Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995			“
Potassium bicarbonate	JFe	1999			“
Potassium chloride 205.602(e)	ZS	1995	HS: 205.605(a)		“
Soap-based algicide/demosers 205.601(a)	FT	1994			“
Soaps, ammonium 205.601(d)	FT	1996			“
Soaps, insecticidal 205.601(e)	JFo	1994			“
Sodium fluoaluminate 205.602(f)	JFo				“
Sodium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011			“
Soluble boron products 205.601(j)	CBe	1995			“
Sticky traps/barriers	CBo				“
Strychnine 205.602(h)	JFe		LS: 205.604(a)		“
Sucrose octanoate esters 205.601(e)	JFo	2005	LS: 205.603(b)		“

Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010			“
Tobacco dust (nicotine sulfate) 205.602(i)	JFe				“
Vitamin B1 205.601(j)	CBe	1995			“
Vitamin C 205.601(j)	CBe	1995			“
Vitamin D3 205.601(g)	JFo	2011			“
Vitamin E 205.601(j)	CBe	1995			“