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**Points where American Organic Standards Differ from NOSB recommendations**

Listed by section number, subject

5.1.2.1	Conversion requirements	possible addition of increased inspection requirement during last year of transition ( EU, Codex)
5.1.3.1	Transitional labeling	recommend allowing
5.1.4.2.D)	Split operations	suggest prohibition against GMO crops on non-organic portions of operation
5.5.2.3.B)	Raw manure	90 days -120 days until harvest
5.5.6.4	Chilean nitrate	prohibit
5.8	Irrigation water	also post harvest water, suggested standards
5.10.1.4.	Hydroponics	suggest restrictions (needs comments)
5.10.3	Sprouts	specific standards proposed, needs support by NOSB on food safety issues and chlorine use
5.10.4	Maple syrup	specific standards
5.10.2.1.A)4)c)	Mushroom spawn	require organic spawn
<b>Livestock</b>		
Definitions	Livestock feed, feed additive, feed supplements, concentrates; helps clarify calculation of 100% livestock feed requirement	
6.5.4	Dairy - allow one time whole herd conversion	
6.5.8.2.D)	Synthetic amino acids	consider prohibition (under Tap review now)
6.5.8.9.	Use of slaughter by-products	Codex wording limits feeding only for herbivores

6.6	Livestock water	require clean source
6.1 6.7.4.2.B)1)	Parasiticides for sheep	possible species exemption to allow use
6.2 6.7.6.2A)	Beak trimming	suggested policy
6.10.1.3.	Milk production	quantitative requirement/suggestion for somatic cell count
6.11	Apiculture	
8.1.2	Criteria for evaluating livestock materials	

**Handling**

3.4	Principles of Organic Handling	new
7.1.4	Certification of retailers and distributors	
7.1.5.	Certification of products less than 50% organic	
7.1.6.1.	Distributor invoices	
7.3.3.1.	70% organic product content	
7.4.4.2	Organic Good Manufacturing Practices	stricter water requirements in split operations
7.5.5.	Structural Pest control	more specific
8.1.3.	Criteria for evaluating handling inputs	

**Certification**

9.11.5.4.	Organic certificate information	standardized information required
9.3	Organic Plan	specific requirements for crops, livestock, handling and wild harvesting

**Accreditation**

10.1-10.23	Incorporation of ISO-65 requirements
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**Additional TAP reviews needed**

5.5.6.2.A) Potassium chloride  
 Livestock: medications, feed additives and carriers (including possible GMOs) commonly found in vitamin and mineral formulations