

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
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### 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 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>	Classification 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 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; <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 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

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

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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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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. Revised TR sent to CS 01 15 14. <b>TR suff due 02 15 14</b>		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. Revised TR sent to CS 01 15 14. <b>TR suff due 02 15 14</b>		Summary: Spr 2014 Review: Fall 2014
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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		Summary: Fall 2014 Review: Spr 2015
<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	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 Spr 2014
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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.		

### Inert Ingredients

Substance	Con- tact	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	Con- tact	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 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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**Absent:** Stacy Jones King (SJK)

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2017 Sunsets (TR requests due to NOP July 2014)					
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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>					
<b>Substance</b>	<b>Contact</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>Contact</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 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	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 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	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)

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	Con- tact	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>Contact</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>Contact</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	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 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
2017 Sunsets (TR requests due to NOP July 2014)					
<a href="#">Ammonium carbonate 205.601(e)</a>		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			“
<a href="#">Calcium hypochlorite 205.601(a)</a>		2011	HS: 205.605(b) LS: 205.603(a)		“
<a href="#">Chlorine dioxide 205.601(a)</a>		2011	HS: 205.605(b) LS: 205.603(a)		“
<a href="#">Copper sulfate 205.601(i)</a>		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. <b>TR sufficiency due July 15, 2014</b> 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 fluoaluminate 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			“
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 Expedited modified TR</a>	Petitr 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 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. 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>		
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

\* **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

<b>Spring 2014 Milestones</b>	<b>Target date</b>
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	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 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 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</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>Contact</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>Contact</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. 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 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	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 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 Lmtd 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</a> <a href="#">(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
<b>Inert Ingredients</b>					
<b>Substance</b>	<b>Contact</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
<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>					
<b>Project</b>	<b>Contact</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 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	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 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 Lmtd 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</a> <a href="#">(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) 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 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 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	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 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 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	Contact	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/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 June 3, 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	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 CS. TR found suffic 02 18 14. CS added questions 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 added questions 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 added questions 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 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	Contact	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
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.		Disc doc Fall 2014

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

### Agenda

- Approve notes from May 20, 2014
- Next steps for Laminarin
- 2017 Sunsets (CBo)
- 2017 Sunsets (HA)
- TR sufficiency on Hydrogen chloride 2016 (JFo)
- Discuss draft for Contamination Issues in Farm Inputs
- Adjourn

### Discussion

- **Crops Subcommittee notes** of May 20, 2014 were approved with no changes.
- **Next steps for Laminarin** - The CS will request a TR for Laminarin. The NOP suggested structuring the request in two parts. The first request could include manufacturing questions to determine classification then the group could proceed from there depending on that information.
- **2017 Sunsets (CBo)**
  - **Ammonium carbonate** - listed at §205.601(e)(1) - for use as bait in insect traps only, no direct contact with crops or soil. The listing is for Handling not Crops. There is a TAP, but no TR or checklist. The lead reviewer suggests requesting a TR.
  - **Boric acid** - listed at §205.601(e)(3) - structural pest control, no direct contact with organic food or crops. There was no past TR or checklist. The previous review indicates there was a TAP review, but the lead person could not locate it (post meeting note from ABS: the document has now been posted on the NOP website). A member questioned whether or not Boric Acid can be

- used in traps, as Ammonium Carbonate is, noting that its use as listed would allow it as bait in traps. The lead suggested a TR be requested.
- **Microcrystalline cheesewax** - listed at §205.601(o) as production aids. Microcrystalline cheesewax (CAS #'s 64742-42-3, 8009-03-08, and 8002-74-2) - for use in log grown mushroom production. Must be made without either ethylene-propylene co-polymer or synthetic colors. There was no TR or TAP but there was a checklist. The listed cheesewax is a petroleum product. The lead noted that there were alternatives available, thus, there is a question of essentiality. A TR could address the health and environmental impacts of microcrystalline cheesewax production as well as the availability of non-GMO soy wax.
  - **2017 Sunsets (HA)**
    - **Lime sulfur** - listed at §205.601(e) as insecticide and at §205.601(i) as plant disease control. Original TAP review was completed in 1995 and based on that and some new information gleaned during the review of two other antibiotics on the National List, the lead reviewer suggests requesting a new TR.
    - **Elemental sulfur** - listed at §205.601 (e) as insecticide, at §205.601 (j) as plant or soil amendment, and at §205.601 (l) as plant disease control. Members discussed previous comments about this materials found in the original 1995 TAP review and public comment. The lead reviewer feels that the Subcommittee can get the needed information from Certifiers and Materials Review Organizations and therefore doesn't feel there is a pressing need for a TR. A member noted that it's his preference to fill out a checklist prior to making a determination about requesting a TR.
    - **Horticultural Oils** - Listed at §205.601(e) as insecticide, (6) Oils, horticultural-narrow range oils as dormant, suffocating, and summer oils and at §205.601(i) plant disease control, (6) Oils, horticultural-narrow range oils as dormant, suffocating, and summer oils. The Group discussed the 1995 TAP review, which indicated that toxicity is low. The lead noted that there are several alternatives (fish, vegetable), but doesn't feel that a new TR is necessary. One member suggested they could seek a TR to ask specific questions about the phrase "narrow range" which seemed to be defined arbitrarily at 205.2.
    - **Pheromones** - Listed at §205.601(f) as insect management. The group discussed pheromones in relation to the inerts review. The NOP and the CS Chair felt that combining these discussions would complicate matters and suggested that the Inerts review needs to be discussed separately. The NOP suggested having a presentation from the Inerts Working Group at the fall 2014 meeting. The latest TR was done in 2012, and for that reason, the lead feels the CS does not need to request a new one.
  - **Hydrogen Chloride 2016 TR sufficiency (JFo)** - postponed to June 17 call.
  - **Contamination Issues in Farm Inputs - Discuss draft** - postponed to June 17 call. The CS Chair asked that members please send comments to JFe (the lead writer) before the next call. The members were also asked to provide some suggestions for guest speakers so they could begin inviting people to participate on the calls.
  - **The meeting was adjourned**

### [Previous CS Notes](#)

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

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 - postponed to June 17

2017 Sunsets (CBo) (Ammonium carbonate, Boric acid, Microcrystalline cheesewax)

2017 Sunsets (HA) (Elemental sulfur, Lime sulfur, Oils, horticultural, Pheromones)

TR sufficiency on Hydrogen chloride 2016 (JFo) - postponed to June 17

June 17, 2014 2:00 ET

TR sufficiency - Hydrogen chloride 2016 (JFo)

Discuss draft for Contamination Issues in Farm Inputs

2017 Sunsets (CBo) – (Newspaper, plastic mulch, sticky traps and barriers)

2017 Sunsets (JFe) - Determine need for TR (Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate))

2017 Sunsets (CBe) - Determine need for TR (Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E

2017 Sunsets (JFo) - Determine need for TR (Soaps (insecticidal), Sodium fluoaluminate, Sodium silicate, Sucrose octanoate esters, Vitamin D3

July 1, 2014 2:00 ET

2017 Sunsets (FT) - Determine need for TR (Calcium hypochlorite, Chlorine dioxide, Ethanol, Herbicides (soap-based), Isopropanol, Soap-based algicide/demossers, Soaps(ammonium), Sodium hypochlorite

2017 Sunsets (CBe) - Determine need for TR

2017 Sunsets (JFo) - Determine need for TR

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/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 June 17, 2014 2:00 pm ET**

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

**Absent:** Francis Thicke, Vice Chair (FT), Carmela Beck (CBe)

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

**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 <a href="#">01/2014</a> <a href="#">3/2010</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 include questions in the fall 2014 doc for posting.	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a> <a href="#">08/2006</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 include questions in the fall 2014 doc for posting.	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 <a href="#">01/2014</a> <a href="#">09/2003</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 include questions in the fall 2014 doc for posting.	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 additional 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. Sufficiency due 07 16 14. TR found sufficient 06 17 14. <b>CS will include questions in the fall 2014 doc for posting.</b>		Summary: Fall 2014 Review: Spr 2015

### Petitioned Substances

Substance	Contact	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. CS 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 ~ 04 01 14.		TBD

<a href="#">Calcium Sulfate (PDF)</a> List at 205.601			Petition sent to CS on 06 16 14. <b>Questions or request for TR due 08 19 14.</b>		
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
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.		Disc doc Fall 2014

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

### Agenda

- Approve notes from June 3, 2014
- TR sufficiency - Hydrogen chloride 2016 (JFo)
- Discuss draft for Contamination Issues in Farm Inputs
- 2017 Sunsets (CBo) - (Newspaper, plastic mulch, sticky traps and barriers)
- 2017 Sunsets (JFe) - Determine need for TR (Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate))
- 2017 Sunsets (CBe) - Determine need for TR (Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E
- 2017 Sunsets (JFo) - Determine need for TR (Soaps (insecticidal), Sodium fluoaluminatate, Sodium silicate, Sucrose octanoate esters, Vitamin D3
- Adjourn

## Discussion

- **Crops Subcommittee notes** of May 20 were edited retroactively based on a correction from the CS Chair to the discussion on hydrated lime.
- **Crops Subcommittee notes** of June 3, 2014 were approved with no changes.
- **TR sufficiency - Hydrogen chloride 2016 (JFo)** - Sunset date is September 9, 2016. Substance is used to de-lint cotton post harvest. The TR was found sufficient, but the lead reviewer wanted to track down one reference about alternatives. The HS will include a list of questions for posting.
- **Contamination Issues in Farm Inputs** - The lead circulated a document to the CS prior to call, which he then summarized and the group discussed. The document is not a comprehensive assessment but rather a review of the most relevant and recent issues. One member identified several expert speakers based on areas of expertise, who could participate on conference calls. Focus areas include composting, laboratory expertise, contamination in inputs, raw manure and antibiotics. The same member suggested engaging OMRI and WSDA first for an overarching view. The first speaker could participate after the July 15 call, and the rest could participate on calls in September. The goal is to identify protocols and guidance on how certifiers would identify contamination from farm inputs. For example OMRI's standards on heavy metal inputs.
- **2017 Sunsets - Determine need for TRs.**
  - **Newspaper and other recycled paper (CBo)** - There is a 2006 TR and a TAP review, but no checklist. Listed at §205.601(b)(2) Mulches. (i) Newspaper or other recycled paper, without glossy or colored inks. §205.601(c) As compost feedstock. Previous NOSB relisted in spring 2011. There is some uncertainty around inks. A TR could address two issues: The annotation should be revisited to determine whether a better identification of hazardous inks may be possible. The lead posed a question about the use of newspaper for mulch and whether it caused a significant impact on the amount of virgin paper produced by reducing the amount of recycled pulp available? The group discussed this question and most feel that it's not an issue because no one is using newspaper anyway. The NOP added that recycled paper may be used to manufacture paper mulches. The group may want to request a TR, although it is not a high priority.
  - **Plastic mulch (CBo)** - Listed at §205.601(b) (2) Mulches. (ii) Plastic mulch and covers (petroleum-based other than polyvinyl chloride (PVC)). There is a 1995 TAP review but no TR or checklist. At the spring 2010 meeting, the NOSB recommended deferring the relisting until updated technical information was obtained. Because the TR was still not available for the spring 2011 meeting, and the NOSB felt that it had a long use history in organic production with minimal known adverse effects, it was relisted. The members discussed the relationship between plastic and biodegradable biobased bioplastic mulch, which was recently approved for addition to the National List, and whether it might be desirable to move away from use of plastic mulch. A member noted that since this the bioplastic decision is so new (and not allowed yet until the final rule is published), not enough time has elapsed to compare them. The group does not feel that a TR would be helpful but perhaps can seek additional information from other sources.
  - **Sticky traps and barriers (CBo)** - Postponed to next call due to lack of time.
  - **Soaps (insecticidal) (JFo)** - There are no new use patterns and no changes in technical formulations since the last review. The lead acknowledged that the NOSB should consider carefully materials that have not had a TR in 20 years, but feels that insecticidal soap would not be on the top of the TR request list. There are others that are more critical.
  - **Sodium fluoaluminate (JFo)** - Listed at §205.602 as a prohibited natural. Neither the lead nor the CS sees a need for a TR and will not request one.
  - **Sodium silicate (JFo)** - Listed at §205.601(l). There was a TR done in 2011 and there are no new use patterns, so the CS will not recommend a new TR.

- **Sucrose octanoate esters (JFo)** - Listed at §205.601(e) and is a recent addition (2005). Approved in crops and livestock and although it is not used widely, it is used. The CS is not requesting a new TR.
- **Vitamin D3 (JFo)** - Listed at §205.601(g). Reviewed in 2011, so the CS is not recommending new TR.
- A member asked about having checklists for materials, especially in cases where there are no recent TRs or reviews, and expressed his concern that there is not a standardized process or format. The NOP noted that the checklists are optional for sunset reviews, and in light of the fact that there are 300+ sunset materials the group may not be able to complete checklists for everything. The Subcommittee will add standardized questions to the summary document about current usage in an effort to leave a written record indicating why they did or did not request a TR. HA, MA and JFo will look at potential forms for this purpose.
- **2017 Sunsets (JFe) - Determine need for TRs. Postponed to July 1.**
  - **Arsenic**
  - **Ash from manure burning,**
  - **EPA List 4 - Inerts of Minimal Concern**
  - **Ethylene,**
  - **Lead salts,**
  - **Potassium bicarbonate,**
  - **Strychnine,**
  - **Tobacco dust (nicotine sulfate)**
- **2017 Sunsets (CBe) - Determine need for TRs. Postponed to July 1.**
  - **Aquatic plant extracts**
  - **Humic acids**
  - **Lignin sulfonate**
  - **Liquid fish products**
  - **Magnesium sulfate**
  - **Soluble boron products**
  - **Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt**
  - **Vitamins B1, C, E**
- **The meeting was adjourned**

**ABS note: June 17, 2014**

Based on the Livestock call that followed this call, the LS will send the CS its questions about the aluminum sulfate petition which will be reviewed jointly. CS will add to this to their discussion agenda and two Subcommittees will submit a combined request for a TR.

[Previous CS Notes](#)

**Future Call Schedule:**

June 3, 2014 2:00 ET

Next steps for Laminarin

Discuss draft for Contamination Issues in Farm Inputs - postponed to June 17

2017 Sunsets (CBo) (Ammonium carbonate, Boric acid, Microcrystalline cheesewax)

2017 Sunsets (HA) (Elemental sulfur, Lime sulfur, Oils, horticultural, Pheromones)

TR sufficiency on Hydrogen chloride 2016 (JFo) - postponed to June 17

June 17, 2014 2:00 ET

- TR sufficiency - Hydrogen chloride 2016 (JFo)

- Discuss draft for Contamination Issues in Farm Inputs
- 2017 Sunsets (CBo) – (Newspaper, plastic mulch, sticky traps and barriers)
- 2017 Sunsets (JFe) - Determine need for TR (Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate))
- 2017 Sunsets (CBe) - Determine need for TR (Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E
- 2017 Sunsets (JFo) - Determine need for TR (Soaps (insecticidal), Sodium fluoaluminatate, Sodium silicate, Sucrose octanoate esters, Vitamin D3

July 1, 2014 2:00 ET

- 2017 Sunsets (CBo) - Sticky traps and barriers.
- 2017 Sunsets (JFe) - Determine need for TR (Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate))
- 2017 Sunsets (FT) - Determine need for TR (Calcium hypochlorite, Chlorine dioxide, Ethanol, Herbicides (soap-based), Isopropanol, Soap-based algicide/demossers, Soaps (ammonium), Sodium hypochlorite
- 2017 Sunsets (CBe) - Determine need for TR (Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E
- Assign calcium sulfate petition

July 15, 2014 2:00 ET

Aug 5, 2014 2:00 ET

- Guest speaker: OMRI?
- 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/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 July 1, 2014 2:00 pm ET**

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

**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	Contact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y <a href="#">01/2014</a> <a href="#">3/2010</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a> <a href="#">08/2006</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	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 <a href="#">01/2014</a> <a href="#">09/2003</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	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 additional 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 Lmtd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. <b>CS will include questions in the fall 2014 doc for posting.</b>		Summary: Fall 2014 Review: Spr 2015

### Petitioned Substances

Substance	Contact	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. <b>CS will request Lmt'd scope TR for further review.</b>		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 or TBD
<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 ~ 04 01 14.		TBD

<a href="#">Calcium Sulfate (PDF)</a> List at 205.601	ZS		Petition sent to CS on 06 16 14. <b>Questions or request for TR due 08 19 14.</b>		
Inert Ingredients					
Substance	Contact	TR reqstd?	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
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.		Disc doc Fall 2014

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

### Agenda

- Approve notes from June 17, 2014
- 2017 Sunsets - Determine need for TRs
  - (CBo) - Sticky traps and barriers.
  - (JFe) - Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate)
  - (FT) - Calcium hypochlorite, Chlorine dioxide, Ethanol, Herbicides (soap-based), Isopropanol, Soap-based algicide/demossers, Soaps (ammonium), Sodium hypochlorite
  - (CBe) - Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E
- Assign calcium sulfate petition Adjourn

### Discussion

- **Crops Subcommittee notes** of June 17, 2014 approved with no changes.
- 2017 Sunsets - Determine need for TRs

- **Sticky traps and barriers (CBo).** Could not locate TAP or TR. The NOP will find this info and forward it, as well as post it on the website. The group discussed the history and use of traps which have evolved since the original listing. The lead suggested a TR which may be difficult due to the large, diverse nature of this category.
- **Arsenic (JFe).** Listed at §205.602. Prohibited by OFPA. No TR needed.
- **Ash from manure burning (JFe).** TR needed. Lead feels there should be documentation of the fact that this substance does not meet OFPA standards, and suggests a checklist be produced.
- **EPA List 4 - Inerts of Minimal Concern (JFe).** The lead feels that a TR is needed, which they will discuss further on the next call. The members discussed beginning the review process on two of the categories of Inerts that the working group has classified. A member added that if the Subcommittee was to proceed with this, allowing some and not others, it would require an annotation change which would require a petition. The NOP supported the idea of requesting a TR to get the process started. EBR will discuss this with National List manager. A member suggested voting to sunset all the Inerts then having the community petition to add them to the list on a specific timetable. Some materials may not pass the EPA's Design for Environment (DFE) process.
- **Ethylene (JFe).** There are two TAP reviews and a TR. There was no checklist performed for listing on §205.601. The NOSB raised issues of compatibility, environmental effects of production, and essentiality. The feasibility of alternatives was mentioned as an area of uncertainty. While pineapple production without ethylene is not problematic for small growers, large growers are dependent on it to control the time of ripening. The group discussed the comments they received from several co-ops/small growers who could also be affected. A member added that without documentation or pressure on the community there is no incentive to develop alternatives. The group also discussed essentiality and adding some questions to the public posting of the proposal to address this.
- **Lead salts (JFe).** No TR needed. Prohibited by OFPA.
- **Potassium bicarbonate (JFe).** There is a TAP from 1995 but no TR. There is no checklist or other decision document. All three reviewers recommended adding it to the National List. The TAP review mentioned that potassium bicarbonate does not fall into any of the OFPA categories. The information on essentiality/effectiveness and impacts of manufacture should be supplemented with up-to-date references. Limited TR/update recommended.
- **Strychnine (JFe).** Listed at §205.602. TR needed. Lead feels there should be documentation of the fact that this substance does not meet OFPA standards, and suggests a checklist be produced.
- **Tobacco dust (nicotine sulfate) (JFe).** Listed at §205.602. Prohibited by OFPA. Feels that since there is no documentation of the fact that this substance does not meet OFPA standards there needs to be a checklist and a TR.
- **Calcium hypochlorite, Sodium hypochlorite, Chlorine dioxide (FT).** All three chlorine materials were relisted as a group on a sunset vote of 10 to 2 in April 2006. A TR was completed in 2006 and was slightly expanded in 2011. The TR is comprehensive and is adequate. Low priority for new TR.
- **Ethanol, Isopropanol (FT).** A TAP review addressing both ethanol and isopropanol was done in 1995. Ethanol was added to §205.601(a)(2) in November 1995 by unanimous vote. Isopropanol was added to §205.601(a)(2) November 1995 by a 13 to 1 vote. Both were relisted by a 13-0 sunset vote in November 2005. The CS received a TR for ethanol in January 2014 and a TR for isopropanol is in development. HA will look at TR for natural sources of ethanol.
- **Soap-based herbicides (FT).** TAP review in 1996. Added to §205.601(b)(1) in September 1996 by unanimous vote. Relisted by a 13 to 0 sunset vote in November 2005. The TAP review was not very comprehensive. Recommended for new TR.

- **Soap-based algicide/demossers (FT).** Listed under §205.601(a)(7) in September 1996 by a unanimous vote. Relisted by a 14 to 0 sunset vote in November 2005. Could not find a TAP review or TR. Recommended a new TR.
- **Soaps (ammonium) (FT).** TAP review in 1996. Recommended as animal repellent in September 1996 by a 12 to 1 vote. The 1996 TAP report contained no useful information, so a new TR is needed.
- **Aquatic plant extracts (CBe).** 2006 TAP. Vote deferred in 2005 pending updated technical info. Voted to relist in 2010. No TR needed. A member added that there might be an older TR listed under Kelp. CBe will check and if so, the NOP will add a cross reference on the website.
- **Humic acids (CBe).** 1996 TAP, 2006 TR. Vote deferred in 2005 pending updated technical info. Voted to relist in 2010. No TR needed. Could review and cite 2012 oxidized lignite TR for more information.
- **Lignin sulfonate (CBe).** 1995 TAP, 2011 TR. Vote deferred pending updated technical info in 2010. No new TR needed.
- **Liquid fish products (CBe).** 1995 TAP, 2006 TR. Voted to relist in 2005 and 2010. Liquid fish products - can be pH adjusted with sulfuric, citric or phosphoric acid. The amount of acid used shall not exceed the minimum needed to lower the pH to 3.5. No TR needed.
- **Magnesium sulfate (CBe).** 1995 TAP, 2011 TR. Magnesium sulfate - allowed with a documented soil deficiency. Vote deferred in 2010 pending updated technical info. No TR needed. The group discussed non-synthetic forms or alternatives. While non-synthetic forms exist they are not used commercially. The NOP suggested adding a question about alternatives for public comment.
- **Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt (CBe).** 2010 TR. Voted to relist in 2005 and 2010. No TR needed.
- **Vitamins B1, C, E (CBe).** 1995 TAP. Voted to relist in 2005 and 2010. No TAP on file; Members discussed these items, questioning why they are on the list in this manner, and recommended a TR.
- **Assign calcium sulfate petition** - The Chair asked that members read this petition and volunteer to review it.
- **The meeting was adjourned**

### [Previous CS Notes](#)

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

June 17, 2014 2:00 ET

TR sufficiency - Hydrogen chloride 2016 (JFo)

Discuss draft for Contamination Issues in Farm Inputs

2017 Sunsets (CBo) – (Newspaper, plastic mulch, sticky traps and barriers)

2017 Sunsets (JFe) - Determine need for TR (Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate))

2017 Sunsets (CBe) - Determine need for TR (Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E

2017 Sunsets (JFo) - Determine need for TR (Soaps (insecticidal), Sodium fluoaluminate, Sodium silicate, Sucrose octanoate esters, Vitamin D3

July 1, 2014 2:00 ET

2017 Sunsets – Determine need for TRs

(CBo) - Sticky traps and barriers.

(JFe) - Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate)  
 (FT) - Calcium hypochlorite, Chlorine dioxide, Ethanol, Herbicides (soap-based), Isopropanol, Soap-based algicide/demossers, Soaps (ammonium), Sodium hypochlorite  
 (CBe) - Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E

Assign calcium sulfate petition

July 15, 2014 2:00 ET

Discuss EPA List 4 - Inerts of Minimal Concern

Aug 5, 2014 2:00 ET

Guest speaker: OMRI?

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

Aug 19, 2014 2:00 ET

Discuss petition sufficiency - calcium sulfate

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	New TR Request	Misc notes	Vote	Meeting
Ammonium carbonate 205.601(e)	CBo	1995	Y (06 03)	HS: 205.605(b) - leavening agent		Summary: Spr 2015 Review: Fall 2015

Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Ash from manure burning 205.602(a)	JFe		? (07 01)			“
Boric acid 205.601(e)	CBo	1995	Y (06 03)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	(05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
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>	N (07 01)	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014 LS: 205.603(a)		“

Ethylene 205.601(k)	JFe	2011	N (07 01)	HS: 205.605(b) – postharvest ripening and degreening		“
Herbicides, soap-based 205.601(b)	FT	1996	Y (07 01)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Hydrated lime 205.601(i)	ZS	2002	? (05 20)	LS: 205.603(b)		“
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995	N (05 20)	HS: 205.605(b) LS: 205.603(a)		“
Isopropanol 205.601(a)	FT		N (07 01)	TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Lime sulfur 205.601(e) 205.601(i)	HA		Y (06 03)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“

Microcrystalline cheesewax 205.601(o)	CBo		Y? (06 03)			“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N0 (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“
Plastic mulch and covers (petroleum- based other than polyvinylchlori de (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium bicarbonate 205.601(i)	JFe	1999	Y Lmtd Scope (07 01)			“
Potassium chloride 205.602(e)	ZS	1995	? Lmtd Scope (05 20)	HS: 205.605(a)		“
Soap-based algicide/demo ssers 205.601(a)	FT	1994	Y (07 01)			“

Soaps, ammonium 205.601(d)	FT	1996	N (07 01)			“
Soaps, insecticidal 205.601(e)	JFo	1994	Low Priority (06 17)			“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“
Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sticky traps/barriers 205.601(e)	CBo		? (07 01)			“
Strychnine 205.602(h)	JFe		Y (07 01)	LS: 205.604(a)		“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“

Tobacco dust (nicotine sulfate) 205.602(i)	JFe		? (07 01)			“
Vitamin B1 205.601(j)	CBe	1995	N (07 01)			“
Vitamin C 205.601(j)	CBe	1995	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“
Vitamin E 205.601(j)	CBe	1995	N (07 01)			“

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 July 15, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Jay Feldman (JFe), Harold Austin (HA), John Foster (JFo), Colehour Bondera (CBo), Francis Thicke, Vice Chair (FT), Jean Richardson - sitting on (JR)

**Absent:** Carmela Beck (CBe)

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

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Summary: Spr 2014 Review: Fall 2014					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y <a href="#">01/2014</a> <a href="#">3/2010</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a> <a href="#">08/2006</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	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 <a href="#">01/2014</a> <a href="#">09/2003</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	NA	Summary: Spr 2014 Review: Fall 2014
2016 Sunsets					
Summary: Fall 2014 Review: Spr 2015					

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 additional 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 Lmtd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. <b>CS will include questions in the fall 2014 doc for posting.</b>		Summary: Fall 2014 Review: Spr 2015
<b>2017 Sunsets</b>					
<b>Summary: Spr 2015    Review: Fall 2015</b>					
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>  Y	TR sent to CS 01 15 14. <b>TR sufficiency due July 15, 2014</b>		
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y			Summary: Spr 2015 Review: Fall 2015
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y			
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	Focus on alternatives		

EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR request for Alkylphenol ethoxylates		
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR combined with Soap-based algicide/demossers 205.601(a)		
Soap-based algicide/demossers 205.601(a)	FT	1994 TAP Y	TR combined with Herbicides, soap-based 205.601(b)		
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		

Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		
Petitioned Substances					
Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmtd Scope	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. <b>CS will request Lmt'd scope TR for further review.</b>		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. TR in development (expected September 2014)		Spr 2015
<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 ~ 04 01 14. TR in development (expected September 2014)		Spring 2015
<a href="#">Calcium Sulfate (PDF)</a> List at 205.601	ZS		Petition sent to CS on 06 16 14. <b>Questions or request for TR due 08 19 14.</b>		TBD
Inert Ingredients					
Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	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
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request but subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		
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.		Disc doc Fall 2014

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

#### Agenda

- Approve notes from July 1, 2014
- Discuss Research Priorities (JFe, ZS)
- 2017 Sunsets - Prioritize TR requests
- Further discussion on List 4 inerts TR request
- Adjourn

#### Discussion

- **Crops Subcommittee notes** of July 1, 2014 were approved with minor changes
- Lindsay Fernandez-Salvador of OMRI was invited to speak on the next CS call. ZS asked that members send her questions so she can forward them to Lindsay ahead of the call.
- Research Priorities (JFe, ZS). JFe is the point person for this workplan item and will touch base with all the appropriate people and report back to Materials on the August 5 call.
- 2017 Sunsets. The CS Chair sent the summary of the 2017 Sunset TR requests prior to the call and the group discussed the final determinations. There are 10 requests, 5 potential candidates, and 3 left to determine. A member emphasized the need for the completion of checklists for the items that won't have TRs so the Board has background information supporting their decisions. The members further discussed the following materials before finalizing their list:
  - Ethylene - Could promote this to medium priority for essentiality and alternatives.
  - Sticky Traps - High-use pattern, but the listing is complex and it would be difficult to request a TR. Another member noted that this would be a candidate for a checklist, so the NOSB has a record in support of their decision making. The CS Chair feels this is a medium priority because the problematic issues (such as the lures) are on the list separately.
  - Tobacco dust/Nicotine sulfate - A prohibited substance so it will be a low priority.
  - Plastic mulch - The CS Chair suggested that the group wait until the final rule on biodegradable mulch is published before revisiting the need for this material.

- Sodium hypochlorite - A member noted that the organic community is eagerly searching for bleach alternatives, and the group feels that the community, and not a TR, would be better suited to answer any questions.
- Hydrogen peroxide - A TR will be requested.
- Coppers – There is a 2011 TR. Used as disease control for crops. A member suggested a limited Scope TR but the chair noted that it wouldn't be necessary for this use. The member suggested that the NOSB identify a need for this material based on its use patterns, and feels the only way to do that is via a TR.
- The Subcommittee discussed three groups of Inerts: NPEs (nonylphenol ethoxylates), the chelating agents EDTA/EDDS (Ethylenediaminetetraacetic acid/ Ethylenediamine-N,N'-disuccinic acid) and List 3 inerts in pheromone dispensers. The Inerts Working Group (IWG) met this past week and determined that because NPEs are problematic and there is published research to this effect, the NOSB should review this group first. The IWG also considered EDTA but felt that NPEs were more pressing. A member argued for adding EDTA/EDDS as a second group. These are two chelating materials that have been the subject of past NOSB review, but it is an unresolved issue in the organic marketplace. Another member supported the idea of requesting separate TRs since these materials are different. The Chair called a vote to determine the TR requests. The NOP indicated that the List 3 Inerts in pheromone dispensers will be addressed next year, and the Subcommittee voted in favoring of requesting a TR but delaying the review until then.

VOTE:

NPE TR request: 7 Y.

(ABS note: Two members voted via email after the call)

EDTA/EDDS: 3 Y, 4 N

(ABS note: Two members voted via email after the call)

List 3 inerts in pheromone dispensers: 7 Y, with 4 members opting to wait until it sunsets next year

(ABS note: Two members voted via email after the call)

- **The meeting was adjourned**

### [Previous CS Notes](#)

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

July 1, 2014 2:00 ET

2017 Sunsets - Determine need for TRs

(CBo) - Sticky traps and barriers.

(JFe) - Arsenic, Ash from manure burning, EPA List 4 - Inerts of Minimal Concern, Ethylene, Lead salts, Potassium bicarbonate, Strychnine, Tobacco dust (nicotine sulfate)

(FT) - Calcium hypochlorite, Chlorine dioxide, Ethanol, Herbicides (soap-based),

Isopropanol, Soap-based algicide/demossers, Soaps (ammonium), Sodium hypochlorite

(CBe) - Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products,

Magnesium sulfate, Soluble boron products, Sulfates/carbonates/oxides/or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt, Vitamins B1, C, E

Assign calcium sulfate petition

July 15, 2014 2:00 ET

Discuss EPA List 4 - Inerts of Minimal Concern

Aug 5, 2014 2:00 ET

Laminarin - need to send request for limited Scope TR to LB  
 Ethanol TR Sufficiency  
 Guest speaker: OMRI  
 Discuss Research Priorities list  
 2015 Sunset reviews: (Sulf Acid, SCP, APS) using new template.

Aug 19, 2014 2:00 ET

Discuss 2016 Sunsets for 1<sup>st</sup> posting: Ferric phosphate, Hydrogen chloride  
 Discuss petition sufficiency - calcium sulfate

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 (No TR requests)						
Substance	Contact	TR	New TR Request	Misc notes	Vote	Meeting
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“

Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Isopropanol 205.601(a)	FT		N (07 01)	TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“

Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“
Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 August 05, 2014 2:00 pm ET**

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

**Absent:** none

**Guest Speaker:** Lindsay Fernandez-Salvador, Organic Materials Review Institute (OMRI)

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

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Summary: Spr 2014 Review: Fall 2014					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y <a href="#">01/2014</a>  <a href="#">3/2010</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	NA	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a>  <a href="#">08/2006</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	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 <a href="#">01/2014</a>  <a href="#">09/2003</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. <b>CS will include questions in the fall 2014 doc for posting.</b>	NA	Summary: Spr 2014 Review: Fall 2014

## 2016 Sunsets

Summary: Fall 2014 Review: Spr 2015

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 additional 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 Lmtd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. <b>CS will include questions in the fall 2014 doc for posting.</b>		Summary: Fall 2014 Review: Spr 2015

## 2017 Sunsets

Summary: Spr 2015 Review: Fall 2015

Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>  Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015 Review: Fall 2015
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y			
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y			
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	Focus on alternatives		
EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR request for Alkylphenol ethoxylates		

Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR combined with Soap-based algicide/demosers 205.601(a)		
Soap-based algicide/demosers 205.601(a)	FT	1994 TAP Y	TR combined with Herbicides, soap-based 205.601(b)		
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

**Petitioned Substances**

<b>Substance</b>	<b>Con-tact</b>	<b>TR requested</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
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<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmtd Scope	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. CS requested Lmt'd scope TR 08 06 14.		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. TR in development (expected September 2014)		Spr 2015
<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 ~ 04 01 14. TR in development (expected September 2014)		Spring 2015
<a href="#">Calcium Sulfate (PDF)</a> List at 205.601	ZS		Petition sent to CS on 06 16 14. <b>Questions or request for TR due 08 19 14.</b>		TBD

### Inert Ingredients

Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	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
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		

### Other Proposals

Project	Contact	Doc type	Notes*	Vote	Meeting
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Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP reqstd 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
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\* **Yellow highlight** indicates Subcommittee action needed

### Agenda

- Approve notes from July 15, 2014
- Guest speaker: Lindsay Fernandez-Salvador (OMRI) - contamination issues
- Ethanol TR Sufficiency (FT)
- Discuss Research Priorities (JFe, ZS)
- 2015 Sunset reviews: (Sulf Acid, SCP, APS) using new template
- Adjourn

### Discussion

- **Crops Subcommittee notes** of July 15, 2014 were approved with no changes.
- **Guest Speaker** - Lindsay Fernandez-Salvador, technical director at OMRI, joined the call to discuss contamination issues in farm inputs. Ms. Fernandez-Salvador talked about the OMRI review standards for lab analyses of heavy metals and their two-tiered threshold for limits in compost/manure/mined minerals. She noted that the thresholds are very stringent and were established using various other standards, although Canada's are now stricter and include more elements.
- One challenge that exists is finding labs that test pesticide residues accurately both in compost and soil, or that detect low levels that may cause harm to plants. Labs must be ISO accredited, most are not equipped to test soils, and threshold levels are not clear. Additionally, tolerance levels cannot always be detected on plants and there needs to be an expert on staff to interpret the lab results. The extent of the problem is not currently quantified, and OMRI investigates on a case by case base, including complaints. Lindsay offered to forward additional documents, regarding suggestions made to NOP on pesticide residue testing. Other topics that were discussed include the need for process oriented standards and tolerance standards for foreign materials (i.e. plastic, glass, shoes, etc.). A member asked about the tolerance and enforcement of foreign materials standards, and Lindsay noted that Canada has standards but the US does not. Although required to have a plan in place to address this, organizations do not have to maintain a certain standard of success. The group also discussed the fact that the US allows GMO materials in compost as long as they are not being applied to crops directly. For these situations, OMRI uses the GMO decision tree to determine if the input is considered to be a direct use of GMOs. A member asked about possible topics for the NOSB address in its Research Priorities, including breakdown products such as heavy metals in relation to various composting processes. OMRI feels that the standard for heavy metals is robust, so perhaps this would not be a priority focus. Instead Lindsay emphasized that pesticide residues in compost is a salient issue, so perhaps contaminant mitigation might be a useful research topic. Other topics include problematic feedstock and guidelines, guidelines on types of testing, establishment of thresholds, and corrective actions. Lindsay recommended several other resources for the Crops Members, including the USCC (US Composting Council).
- Ethanol TR Sufficiency (FT). The group discussed several outstanding questions: How widely used is ethanol as a disinfectant/sanitizer in irrigation or other crop production and what is the availability of natural (non-synthetic) sources of ethanol? A member noted that ethanol is an input and is not required to be organic. It can be produced in non-synthetic and non-synthetic forms. When the original review was conducted in 1995 there were no fermented sources which is why it was added to the List,

but the most current TR indicates that 95% are from fermented sources. This material will also be reviewed for sunset 2017. **ABS Post call note:** The TR was found sufficient.

- Discuss Research Priorities (JFe, ZS). JFe will circulate the prior list of Research Priorities. Members suggested other topics for possible inclusion on the list including: No-till organic production; Citrus greening; Biological controls as alternative management systems; and an alternative to Re-Tain, which was used for post-harvest apple storage. Re-Tain was taken off the list because of inert ingredients, and it left a large need in organic apple production. Another member suggested a topic to focus attention on the application of foundational soils management practices, such as crop rotations, etc. and why they are beneficial. The organic community employs these principles routinely, and yet sometimes it is at a loss to demonstrate the benefits of such practices. The CS Chair noted that this was partially addressed in a previous RP on whole farm systems, but perhaps this new idea could provide refinement. A Subcommittee member noted that based on the feedback from the OWG on the last set of priorities, the more holistic and comprehensive the research project the harder it seems to get funding. JFe asked that members send additional ideas to him before the next MS call, in one week.
- 2015 Sunset reviews: (Sulfurous Acid, SCP, APS) using new template
  - The group discussed the new Sunset Review templates. The NOP noted that if the members wanted to use a checklist they can, however, it is not required. For consistency it should be included as an attachment and not incorporated into the actual text. Most members were supportive of this approach. The group discussed the mechanics of adding a “motion to remove” a material when the material is posted for the second review. Should this motion be added to all, or just the ones they do intend to remove? The Chair emphasized the need to be clear and uniform. The CS asked the NOP to provide feedback to the NOSB about how to finalize the documents specifically regarding the information that should be included in the summary in the review doc # 2. The group also discussed renaming the documents so it is clear to the stakeholders which review phase it represents.
- **The meeting was adjourned**

### [Previous CS Notes](#)

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

July 15, 2014 2:00 ET

Discuss EPA List 4 - Inerts of Minimal Concern

Aug 5, 2014 2:00 ET

Laminarin - need to send request for limited Scope TR to LB

Ethanol TR Sufficiency

Guest speaker: OMRI

Discuss Research Priorities list

2015 Sunset reviews: (Sulf Acid, SCP, APS) using new template

Aug 19, 2014 2:00 ET

Discuss 2016 Sunsets for 1<sup>st</sup> posting: Ferric phosphate, Hydrogen chloride

Discuss petition sufficiency - calcium sulfate

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 (No TR requests)						
Substance	Cont act	TR	New TR Rqst	Misc notes	Vote	Meeting
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“

Isopropanol 205.601(a)	FT		N (07 01)	TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“
Plastic mulch and covers (petroleum- based other than polyvinylchlori de (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“

Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 August 19, 2014 2:00 pm ET**

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

**Absent:** Carmela Beck (CBe)

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

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Summary: Spr 2014    Review: Fall 2014					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <u>Original petition 2008</u>	CBo	Y <u>0</u> <u>1/2014</u> <u>3/2010</u>	<u>Original recomm May 2009</u> 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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <u>Original petition 2006</u>	ZS	Y <u>01/2014</u> <u>08/2006</u>	<u>Original recomm Nov 2007</u> 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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 205.601(e) and 205.601(i) Original petitions: <u>2004</u> , <u>2006</u>	JFe	Y <u>01/2014</u> <u>09/2003</u>	<u>Original recomm Nov 2007</u> 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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014

**2016 Sunsets**

Summary: Fall 2014 Review: Spr 2015

Substance	Con-tact	TR requested	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	<u>2004 TAP</u>  <u>2010 TR</u> <u>2012 TR</u> <u>Supp</u>  No additional TR	Sunset Date: 09 12 16 <u>2003 Petition to add to 205.601</u> <u>2003 Petition supplement</u> <u>2005 NOSB rec (passed)</u>  <u>2009 Petition to remove from 205.601(h)</u> <u>2012 NOSB rec (failed)</u>	NA	Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<u>2003 TAP</u>  Y	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <u>2002 Petition</u> <u>NOSB rec</u>  Request for Lmtd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.	NA	Summary: Fall 2014 Review: Spr 2015

**2017 Sunsets**

Summary: Spr 2015 Review: Fall 2015

Ethanol (Alcohols) 205.601(a)	FT	<u>1995 TAP</u>  Y	TR sent to CS 01 15 14. <b>TR sufficiency due July 15, 2014</b>		Summary: Spr 2015 Review: Fall 2015
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y			
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y			
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	Focus on alternatives		
EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR request for Alkylphenol ethoxylates		

Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR combined with Soap-based algicide/demossers 205.601(a)		
Soap-based algicide/demossers 205.601(a)	FT	1994 TAP Y	TR combined with Herbicides, soap-based 205.601(b)		
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

**Petitioned Substances**

<b>Substance</b>	<b>Contact</b>	<b>TR requested</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
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<u>Laminarin</u> List at 205.601	ZS	Y Lmtd Scope	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. CS requested Lmt'd scope TR 08 06 14.		TBD
<u>Carbon monoxide (exhaust gas)</u> 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. TR in development (expected September 2014)		Spr 2015
<u>Allyl isothiocyanate (AITC)</u> 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 ~ 04 01 14. TR in development (expected September 2014)		Spr 2015
<u>Calcium Sulfate (PDF)</u> List at 205.601	ZS		Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14.		TBD
<b>Inert Ingredients</b>					
<b>Substance</b>	<b>Contact</b>	<b>TR reqstd?</b>	<b>Notes*</b>	<b>Vote</b>	<b>Meeting</b>
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Report Fall 2014
<u>Propylene carbonate</u> 205.601			<u>Notice 11-6: Notice to NL Petitioners, Feb 3, 2011</u>  <u>NOP 5008: Guidance on Reassessed Inert Ingredients (PDF)</u>		TBD
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		
<b>Other Proposals</b>					
<b>Project</b>	<b>Contact</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.	08 19 14	Disc doc Fall 2014
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\* **Yellow highlight** indicates Subcommittee action needed

### Agenda

- Approve notes from August 5, 2014
  - Discuss 2015 sunset reviews (Sulfurous acid, Sodium carbonate peroxyhydrate, APS)
  - Discuss 2016 Sunsets for 1<sup>st</sup> posting: Ferric phosphate, Hydrogen chloride
  - Discuss calcium sulfate petition sufficiency
- Adjourn

### Discussion

- **Approval of Crops Subcommittee notes** of August 5, 2014 deferred to next call
- **2015 sunset reviews** (Sulfurous acid, Sodium carbonate peroxyhydrate (SCP), Aqueous potassium silicate (APS). The members discussed the two options for presenting the 2015 Sunset reviews for the second-meeting posting: The Subcommittee could bring their determination about the material to the full Board as a way to inform the Board that the Subcommittee review was completed and it is proposing that the material remain on the National List. The second option is for the Subcommittee to propose to remove every material, then the full NOSB would vote to remove every material. The members also discussed voting procedures for returning something to Subcommittee. The CS Chair would prefer to send a proposal to the Board indicating that the substance has been reviewed by the Subcommittee and should continue to be listed. But in light of the new Sunset process the vote to remove will serve to communicate to the public and the full Board that the Subcommittee reviewed the materials and made a proposal. The group discussed at length the recent suggestion by the NOP regarding voting on the Sunset materials in Subcommittee, as well as the process at the Board meeting. Members discussed the addition of language to the sunset proposals (see below) indicating that the Subcommittee will make a motion to remove on each of the materials when moving them from the Subcommittee to the full Board for a vote. The CS Chair proposed this language because many of the Board members were not comfortable with the notion that the full Board would not be able to vote on each item.

A member stated that this new process is not in line with what was outlined in the new Sunset process published in the Federal Register in September 2013, which requires that motions to remove be justified by criteria established by the Organic Foods Production Act. Additionally, the member added that recent changes to the procedures outlined in the FR notice without a new FR notice informing the public inflict more harm to the credibility of board governance and reduce respect for the organic label. The NOP noted that Subcommittee members need to cite general OFPA criteria such as essentiality or compatibility as the basis for proposals to remove. A member of the Subcommittee questioned how that could be under procedures as outlined in the FR and on the review sheet.

The NOP noted that the FR notice is not a regulation or statute, but a notice that describes evolving NOSB procedures. Responding to the Board's request to vote on all sunset materials, the NOP suggested Subcommittees could make a motion to remove all substances. One member stated that this is a logistical issue and does not fundamentally change the instructions that were published in September 2013. The group made minor edits to the paragraph and will add it to each of the proposals.

The members proceeded to a vote on the three 2015 Sunset Materials. Those opposing the new process to vote to remove all materials voted in the negative and those that support the process voted in the affirmative. Some Subcommittee members feel their votes do not convey the intent for whether the material should be removed, but only the will of the group to send the proposal forward for a full Board vote. The subcommittee had an interactive discussion in which one member stated that motions to remove must be supported by substantive justification describing how the motion substantively meets the criteria or criterion, as described in the FR and on the review sheet and that the NOP in public has said that the only way that the full board can vote on a material is if it moves from the subcommittee with a motion to remove. The member continued that, in his opinion, according to the FR notice, if there is not a motion to remove, there is no vote by the board, and the material remains on the National List.

The Subcommittee discussed writing a brief statement (~ two sentences) to indicate that the Subcommittee supported continued listing of the crop substances but is putting forth the motion to remove so the material will be forwarded to the Board for a full NOSB vote. One members interpretation of the new process is that according to the FR notice, if there is not a motion to remove, there is no vote by the board, and the material remains on the National List. The CS Chair asked members to craft the brief clarification statement and send her suggestions. She too will work on some language.

**To be added to each Sunset proposal for clarification**

The CS believes that the full board should have the opportunity to complete the review of each sunset material by voting. The NOP has stated that to do this a motion to remove should be brought from the Subcommittee for each substance. If the Subcommittee motion to remove fails to receive a majority, the motion will still be put forward to the full Board for review. The motion to remove is voted on by the full Board and needs to receive a 2/3 majority to become a recommendation.

**Vote on Aqueous Potassium Silicate (APS)**

**Motion:** to remove APS from the National List based on the following criteria in the Organic Foods Production Act (OFPA): 7 U.S.C. 6158(m), (7) its compatibility with a system of sustainable agriculture

**Motion by:** HA

**Seconded by:** CBe

**Discussion:** The group discussed the need for the addition of the above paragraph for clarity. Members also discussed the inclusion of brand names and whether they should be included.

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

**Vote on Sodium Carbonate Peroxyhydrate (SCP)**

**Motion:** to remove SCP from the National List based on the following criteria in the Organic Foods Production Act (OFPA): 7 U.S.C. 6158(m), (7) its compatibility with a system of sustainable agriculture

**Motion by:** ZS

**Seconded by:** HA

**Discussion:** none

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

**Vote on Sulfurous Acid**

**Motion:** to remove Sulfurous Acid from the National List based on the following criteria in the Organic Foods Production Act (OFPA): 7 U.S.C. 6158(m), (7) its compatibility with a system of sustainable agriculture

**Motion by:** JFo

**Seconded by:** HA

**Discussion:** Members discussed and made minor edits to the language in the proposal

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

After the meeting, on August 25, 2014, a member suggested, in response to the Chair's call for clarification, that the minority perspective be reflected in the meeting notes and on the 2015 sunset review documents.

- **Discuss 2016 Sunsets** for 1<sup>st</sup> posting: Ferric phosphate, Hydrogen chloride.
  - The CS has no additional questions to post for ferric phosphate and will post the summary as is.
  - Hydrogen Chloride. The lead reviewer revised the document based on comments from the members during the call and will resend the paragraph to the group.
- **Calcium sulfate petition sufficiency.** Deferred to next call.
- **Contamination Issues in Farm Inputs Literature Review.** The lead reviewer intends on having a literature review ready for the fall meeting. The group discussed the possibility of having another call to review this document.

**ABS Note 08 27 14:** Members circulated the revised document via email after the call and voted via email.

**Motion to accept the Contamination Issues in Farm Inputs Literature Review**

**Motion by:** Jay Feldman

**Seconded by:** Zea Sonnabend

Y: 5 N: 2 Absent: 1 Abstain: 0 Recuse: 0

- **The meeting was adjourned**

### Previous CS Notes

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

Aug 5, 2014 2:00 ET

Laminarin - need to send request for limited Scope TR to LB

Ethanol TR Sufficiency

Guest speaker: OMRI

Discuss Research Priorities list

2015 Sunset reviews: (Sulf Acid, SCP, APS) using new template

Aug 19, 2014 2:00 ET

2015 Sunset reviews: (Sulf Acid, SCP, APS) using new template

Discuss 2016 Sunsets for 1<sup>st</sup> posting: Ferric phosphate, Hydrogen chloride

Discuss petition sufficiency - calcium sulfate

Sep 2, 2014 2:00 ET

Discuss petition sufficiency - calcium sulfate

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 (No TR requests)						
Substance	Cont act	TR	New TR Rqst	Misc notes	Vote	Meeting
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“

Isopropanol 205.601(a)	FT		N (07 01)	TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“
Plastic mulch and covers (petroleum- based other than polyvinylchlori de (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“

Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 September 2, 2014 2:00 pm ET**

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

**Absent:** Jay Feldman (JFe)

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

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Summary: Spr 2014    Review: Fall 2014					
Substance	Contact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y <a href="#">01/2014</a> <a href="#">3/2010</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a> <a href="#">08/2006</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 include questions in the fall 2014 doc for posting.	08 19 14	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 <a href="#">01/2014</a> <a href="#">09/2003</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014

## 2016 Sunsets

Summary: Fall 2014 Review: Spr 2015

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 additional 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>	NA	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 NOSB rec</a>  Request for Lmt'd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.		Summary: Fall 2014 Review: Spr 2015

## Petitioned Substances

Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmt'd Scope	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. CS requested Lmt'd scope TR 08 06 14.		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. TR in development (expected September 2014)		Spr 2015

Petitioned Substances					
<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 ~ 04 01 14. TR in development (expected September 2014)		Spr 2015
<a href="#">Calcium Sulfate (PDF)</a> List at 205.601	ZS		Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14.		TBD
Inert Ingredients					
Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Verbal 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
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		
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.		Disc doc Fall 2014

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

#### Agenda

- Approve notes from August 5 and 19, 2014
- Discuss petition sufficiency - calcium sulfate
- Verify TR sufficiency for Ethanol
- Discuss 2015 Workplan
- Adjourn

## Discussion

- **Approval of Crops Subcommittee notes** of August 5. The notes were approved with minor changes to the conversation about ethanol. The TR was found sufficient during the August 5 call and that was not captured in the notes.
- **Approval of Crops Subcommittee notes** of August 19, 2014. The group discussed the changes that JFe sent prior to the call. JFe was unable to participate on the call, so the group chose to defer the approval so he could be a part of the conversation. The Chair, as well as many members, wanted to relay their common sentiment that it is not respectful to make changes to documents after a call has concluded, and after a material was voted on. Additionally, out of respect for other members, the CS Chair asked that members provide more than a 24 hour notice, and ideally more than 48 hours, when circulating documents.
- **Discuss petition sufficiency - Calcium Sulfate.** The Chair noted that the lead reviewer provided a comprehensive summary. The petition was found sufficient and the Chair will relay that information to the NOP. The group discussed how to proceed given that this is a synthetic fertilizer. The CS is not inclined to ask for a TR and is considering rejecting the proposal. Prior Boards have done this based on the fact that it is a synthetic fertilizer which may not be allowed according to OFPA. ZS will send a note to LB noting petition sufficiency and the group will continue the discussion on the next call.
- **Verify TR sufficiency for Ethanol.** The CS found the TR sufficient on the August 5 call. MA corrected the notes to reflect this.
- **Discuss 2015 Workplan.** The 2015 workplan includes the following: Contamination Issues in Farm Inputs Literature Review, Laminarin, Allyl isothiocyanate (AITC), Carbon monoxide (exhaust gas), and calcium sulfate
- The CS Chair added a discussion of Contamination Issues in Farm Inputs document to the September 16 call and asked members to bring suggestions for guest speakers to invite to the next few calls.
- **The meeting was adjourned**

## [Previous CS Notes](#)

### Future Call Schedule:

Aug 19, 2014 2:00 ET

2015 Sunset reviews: (Sulf Acid, SCP, APS) using new template

Discuss 2016 Sunsets for 1<sup>st</sup> posting: Ferric phosphate, Hydrogen chloride

Discuss petition sufficiency - calcium sulfate

Sep 2, 2014 2:00 ET

Discuss petition sufficiency - calcium sulfate

Sep 16, 2014 2:00 ET

Review notes from August 19

Discuss speakers for future calls re: Contamination Issues

Oct 7, 2014 2:00 ET

Oct 21, 2014 2:00 ET

Nov 4, 2014 2:00 ET

Vote on calcium sulfate

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)

Summary: Spr 2015    Review: Fall 2015

Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a> Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015 Review: Fall 2015
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y			
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y			
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	Focus on alternatives		
EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR request for Alkylphenol ethoxylates		
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR combined with Soap-based algicide/demossers 205.601(a)		
Soap-based algicide/demossers 205.601(a)	FT	1994 TAP Y	TR combined with Herbicides, soap-based 205.601(b)		
Boric acid	CBo	1995 TAP Y			

Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

### 2017 Sunsets (No TR requests)

Substance	Cont act	TR	New TR Rqst	Misc notes	Vote	Meeting
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“

Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Isopropanol 205.601(a)	FT		N (07 01)	TR in development LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“

Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“
Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 September 16, 2014 2:00 pm ET**

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

**Absent:** Francis Thicke, Vice Chair (FT), Carmela Beck (CBe)

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

**Work plan**

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Summary: Spr 2014    Review: Fall 2014					
Substance	Contact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y <a href="#">01/2014</a> <a href="#">3/2010</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a> <a href="#">08/2006</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 include questions in the fall 2014 doc for posting.	08 19 14	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 <a href="#">01/2014</a> <a href="#">09/2003</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014

## 2016 Sunsets

Summary: Fall 2014 Review: Spr 2015

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 additional 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>	NA	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. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.		Summary: Fall 2014 Review: Spr 2015

## Petitioned Substances

Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmt'd Scope	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. CS requested Lmt'd scope TR 08 06 14.		TBD
Exhaust gas <a href="#">(Carbon monoxide)</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. TR in development (expected September 2014)		Spr 2015

Petitioned Substances					
<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 ~ 04 01 14. TR in development (expected September 2014)		Spr 2015
<a href="#">Calcium Sulfate (PDF)</a> List at 205.601	ZS		Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14. Petition found sufficient 09 02 14.		TBD
Inert Ingredients					
Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Verbal Report Fall 2014
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		
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.		Disc doc Fall 2014

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

#### Agenda

- Approve notes from August 19, 2014
- Approve notes from September 2, 2014
- Discuss status of TRs on Allyl isothiocyanate and Exhaust Gas
- Discuss speakers for future calls re: Contamination Issues
- Adjourn

#### Discussion

- **Approval of Crops Subcommittee notes** of August 19, 2014 approved after edits were suggested by the group.
- Notes from September 2, 2014 were approved as is.

- **MA edited the table above** - removing Propylene carbonate from the workplan as it is on hold while the Inerts working group is continuing to address alternatives.
- The group discussed various speakers and topics to address contamination issues in farm inputs. Suggestions included people with extensive backgrounds in testing, soil, compost and residues, and pesticide testing. The CS will host speakers on October 7 and 21.
- **The meeting was adjourned**

[Previous CS Notes](#)

**Future Call Schedule:**

Sep 2, 2014 2:00 ET

Discuss petition sufficiency - calcium sulfate

Sep 16, 2014 2:00 ET

Review edits to notes of August 19

Discuss speakers for future calls re: Contamination Issues

Oct 7, 2014 2:00 ET.

Guest speaker

Review public comments.

Oct 21, 2014 2:00 ET

Nov 4, 2014 2:00 ET

Vote on calcium sulfate **Calls immediately after Board Meeting will be cancelled.**

Nov 18, 2014 2:00 ET

Guest speaker

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
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Fall 2014 NOSB Meeting – Louisville, KY	Oct 27 - Oct 31

**2017 Sunsets (TR requests)**

**Summary: Spr 2015    Review: Fall 2015**

Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a> Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015 Review: Fall 2015
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y	TR requested 08 15 14		
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y	TR requested 08 15 14		
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	TR requested 08 15 14. Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	TR requested 08 15 14. Focus on alternatives		
EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR requested 08 15 14 for Alkylphenol ethoxylates		
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR requested 08 15 14 TR combined with Soap-based algicide/demossers 205.601(a)		
Soap-based algicide/demossers 205.601(a)	FT	1994 TAP Y	TR requested 08 15 14 TR combined with Herbicides, soap-based 205.601(b)		
Isoproponol			TR requested, in development		
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		

Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

#### 2017 Sunsets (No TR requests)

Substance	Cont act	TR	New TR Rqst	Misc notes	Vote	Meeting
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“

Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Isopropanol 205.601(a)	FT		N (07 01)	TR in development (expected Sept 2014) LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“
Plastic mulch and covers (petroleum- based other than polyvinylchlori de (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“

Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 October 7, 2014 2:00 pm ET**

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

**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					
Summary: Spr 2014    Review: Fall 2014					
Substance	Contact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y <a href="#">01/2014</a> <a href="#">3/2010</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a> <a href="#">08/2006</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 include questions in the fall 2014 doc for posting.	08 19 14	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 <a href="#">01/2014</a> <a href="#">09/2003</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014

## 2016 Sunsets

Summary: Fall 2014 Review: Spr 2015

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 additional 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>	NA	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. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.		Summary: Fall 2014 Review: Spr 2015

## 2017 Sunsets (TR requests)

Summary: Spr 2015 Review: Fall 2015 See Table Below

## Petitioned Substances

Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmt'd Scope	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. CS requested Lmt'd scope TR 08 06 14.		TBD
Exhaust gas <a href="#">(Carbon monoxide)</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. TR in		Spr 2015

Petitioned Substances					
			development (expected September 2014). TR sent to CS 10 0 6 14. Sufficiency due 12 05 14.		
<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 ~ 04 01 14. TR in development (expected September 2014). TR sent 10 06 14. Sufficiency due 12 05 14.		Spr 2015
<a href="#">Calcium Sulfate</a> List at 205.601	ZS		Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14. Petition found sufficient 09 02 14.		TBD
<a href="#">3-decene-2-one</a> <a href="#">CAS # 10519-33-2</a>	CBe		Petition sent to CS on 09 24 14. Questions or request for TR due 11 24 14.		TBD
Inert Ingredients					
Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Verbal Report Fall 2014
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		
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.		Disc doc Fall 2014

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

#### Agenda

- Approve notes from September 16, 2014
- Review public comments
- Assign new petition for 3-decene-2-one sent to CS 09 24 14
- Adjourn

## Discussion

- **Crops Subcommittee notes** of September 16, 2014 approved with no changes
- The CS plans on scheduling a guest speaker in November
- **Fall meeting agenda items.**
  - **Verbal update on inerts** - EBR will present an update at the fall 2014 meeting, with input from ZS and JFe if needed
  - **Contamination in Farm Inputs** - The NOSB received approximately 70 comments from individual commenters about this topic.
  - **2015 sunset reviews:**
    - **Sulfurous Acid and Sodium Carbonate Peroxyhydrate (SCP)** discussions were deferred to next call.
    - **APS.** The NOSB has received ~40 comments including one from the petitioner. Most of the comments about the 2015 sunset materials raised the issue of the Subcommittee process for reviewing sunset materials and did not comment specifically on the materials in question.
  - **2016 sunset reviews:**
    - **Ferric phosphate** received a couple of comments from growers and from Beyond Pesticides.
    - **Hydrogen chloride** discussion was deferred to the next call.
- **Petition for 3-decene-2-one.** CBe volunteered to be the lead reviewer. Table above was updated to reflect this
- The NOP forwarded three TRs: Exhaust gas, Allyl isothiocyanate, and Isoproponol. See table for sufficiency due dates
- **The meeting was adjourned**

## [Previous CS Notes](#)

### Future Call Schedule:

Sep 16, 2014 2:00 ET

Review edits to notes of August 19

Discuss speakers for future calls re: Contamination Issues

Oct 7, 2014 2:00 ET.

Guest speaker

Assign new petition for 3-decene-2-one (sent to CS 09 24 14)

Review public comments

Oct 21, 2014 2:00 ET

Continue discussion about 2015 and 2016 sunset reviews

Review public comments

Nov 4, 2014 2:00 ET - (cancelled-Veteran's Day)

Nov 18, 2014 2:00 ET

Vote on calcium sulfate

Guest speaker

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)					
Summary: Spr 2015    Review: Fall 2015 (Most TRs expected January 2015)					
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a> Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015 Review: Fall 2015
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y	TR requested 08 15 14		
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y	TR requested 08 15 14		
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	TR requested 08 15 14. Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	TR requested 08 15 14. Focus on alternatives		
EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR requested 08 15 14 for Alkylphenol ethoxylates		
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR requested 08 15 14 TR combined with Soap-based algicide/demosers 205.601(a)		
Soap-based algicide/demosers 205.601(a)	FT	1994 TAP Y	TR requested 08 15 14 TR combined with Herbicides, soap-based 205.601(b)		

Isoproponol			Draft TR sent to CS 09 24 14. TR suff due 11 24 14		
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

**2017 Sunsets (No TR requests)**

<b>Substance</b>	<b>Cont act</b>	<b>TR</b>	<b>New TR Rqst</b>	<b>Misc notes</b>	<b>Vote</b>	<b>Meeting</b>
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Isopropanol 205.601(a)	FT		N (07 01)	TR in development (expected Sept 2014) LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“

Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“
Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“
Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“

Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 October 21, 2014 2:00 pm ET**

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

**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					
Summary: Spr 2014    Review: Fall 2014					
Substance	Con- tact	TR requested	Notes*	Vote	Meeting
Sulfurous Acid at 205.601(j) <a href="#">Original petition 2008</a>	CBo	Y <a href="#">01/2014</a> <a href="#">3/2010</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 205.601(a) <a href="#">Original petition 2006</a>	ZS	Y <a href="#">01/2014</a> <a href="#">08/2006</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 include questions in the fall 2014 doc for posting.	08 19 14	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 <a href="#">01/2014</a> <a href="#">09/2003</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 include questions in the fall 2014 doc for posting.	08 19 14	Summary: Spr 2014 Review: Fall 2014

## 2016 Sunsets

Summary: Fall 2014 Review: Spr 2015

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 additional 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>	NA	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. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.		Summary: Fall 2014 Review: Spr 2015

## 2017 Sunsets (TR requests)

Summary: Spr 2015 Review: Fall 2015 See Table Below

## Petitioned Substances

Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmt'd Scope	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. CS requested Lmt'd scope TR 08 06 14.		TBD
Exhaust gas <a href="#">(Carbon monoxide)</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. TR in		Spr 2015

Petitioned Substances					
			development (expected September 2014). TR sent to CS 10 0 6 14. Sufficiency due 12 05 14.		
<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 ~ 04 01 14. TR in development (expected September 2014). TR sent 10 06 14. Sufficiency due 12 05 14.		Spr 2015
<a href="#">Calcium Sulfate</a> List at 205.601	ZS		Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14. Petition found sufficient 09 02 14.		TBD
<a href="#">3-decene-2-one</a> <a href="#">CAS # 10519-33-2</a>	CBe		Petition sent to CS on 09 24 14. Questions or request for TR due 11 24 14.		TBD
Inert Ingredients					
Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Verbal Report Fall 2014
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		
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.		Disc doc Fall 2014
Annotation Changes			Annotation change on workplan as test for changing annotations w/o petition		

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

## Agenda

- Approve notes from October 7, 2014
- Continue discussion about 2015 and 2016 sunset reviews
- Review public comments
- Adjourn

## Discussion

- **Crops Subcommittee notes** of October 7, 2014 approved as is.
- **2015 Sunsets**
  - **Sulfurous acid.** A member noted that approximately 29 farmers provided comments in support of continued use while 145 individuals submitted comments about the sunset process as opposed to the material.
  - Sodium carbonate peroxyhydrate – very few comments from farmers, some from the manufacturer and groups who were concerned about the process. CS would like to work separately on the annotation, which they feel is unnecessary.
  - Aqueous potassium silicate. The CS received 4 comments from the manufacturer.
- **2016 Sunsets**
  - **Ferric phosphate.** A member noted that some of the comment attachments were missing from the bundled comments. MA will correct this and resend.
  - **Hydrogen Chloride.** A member noted that those commenters with knowledge of this material were in favor or relisting it, although reluctantly, noting the toxicity of the materials while acknowledging the lack of alternatives. Some supported the removal of this material from the National List. The CS recommends relisting while emphasizing the need for research into mechanical alternatives for de-linting cotton. The also intend on requesting an updated TR for future reviews.
  - **Contamination in Farm Inputs.** The lead will present a PowerPoint at the meeting which will include future directions.
  - **Inerts.** The Chair read a prepared statement expressing her disapproval about the release of internal information by an NOSB member. She noted that an internal working document from the Inerts Working Group was circulated to members of the public and was subsequently incorporated into comments that were submitted to the public meeting docket. The members discussed actions to prevent this from happening in the future, and reminded the member that there is language in the Policy & Procedures Manual regarding privileged information.
- **The meeting was adjourned**

## [Previous CS Notes](#)

### Future Call Schedule:

Oct 7, 2014 2:00 ET.

Guest speaker

Assign new petition for 3-decene-2-one (sent to CS 09 24 14)

Review public comments

Oct 21, 2014 2:00 ET

Continue discussion about 2015 and 2016 sunset reviews

Review public comments

Nov 4, 2014 2:00 ET - (cancelled-Veteran's Day)

Nov 18, 2014 2:00 ET

Vote on calcium sulfate

Guest speaker

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)					
Summary: Spr 2015 Review: Fall 2015 (Most TRs expected January 2015)					
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a> Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015 Review: Fall 2015
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y	TR requested 08 15 14		
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y	TR requested 08 15 14		
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	TR requested 08 15 14. Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	TR requested 08 15 14. Focus on alternatives		
EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR requested 08 15 14 for Alkylphenol ethoxylates		
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR requested 08 15 14 TR combined with Soap-based algicide/demosers 205.601(a)		
Soap-based algicide/demosers 205.601(a)	FT	1994 TAP Y	TR requested 08 15 14 TR combined with Herbicides, soap-based 205.601(b)		

Isoproponol			Draft TR sent to CS 09 24 14. TR suff due 11 24 14		
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

**2017 Sunsets (No TR requests)**

<b>Substance</b>	<b>Cont act</b>	<b>TR</b>	<b>New TR Rqst</b>	<b>Misc notes</b>	<b>Vote</b>	<b>Meeting</b>
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Isopropanol 205.601(a)	FT		N (07 01)	TR in development (expected Sept 2014) LS: 205.603(a)		“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“

Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“
Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“
Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“

Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 November 18, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Harold Austin (HA), John Foster (JFo), Colehour Bondera (CBo), Francis Thicke, Vice Chair (FT), Jay Feldman (JFe), Jean Richardson (JR) - sitting in, Paula Daniels (PD) - sitting in

**Absent:** Carmela Beck (CBe), Jay Feldman (JFe)

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

**Work Agenda**

2016 Sunsets					
Summary: Fall 2014 Review: Spr 2015					
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 additional 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>	NA	Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0)	JFo	<a href="#">2014</a> <a href="#">Lmtd</a> <a href="#">Scope TR</a>  <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>  Request for Lmtd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.		Summary: Fall 2014 Review: Spr 2015
2017 Sunsets (TR requests)					
Summary: Spr 2015 Review: Fall 2015 See Table Below					

Petitioned Substances					
Substance	Contact	TR requested	Notes*	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmtd Scope	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. CS requested Lmt'd scope TR 08 06 14. (expected Feb 2015)		TBD
Exhaust gas ( <a href="#">Carbon monoxide</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. TR in development (expected September 2014). TR sent to CS 10 0 6 14. <b>Sufficiency due 12 05 14.</b>		Spr 2015
<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 ~ 04 01 14. TR in development (expected September 2014). TR sent 10 06 14. TR found sufficient 11 18 14.		Spr 2015
<a href="#">Calcium Sulfate</a> List at 205.601	ZS	N	Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14. Petition found sufficient 09 02 14. No TR request.		Spr 2015
<a href="#">3-decene-2-one</a> CAS # <a href="#">10519-33-2</a>	CBe		Petition sent to CS on 09 24 14. <b>Questions or request for TR due 11 24 14.</b>		TBD
Inert Ingredients					
Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Verbal Report Spr 2015
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		TBD

Other Projects					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	JFe	DD			Disc doc Spr 2015
Sodium carbonate peroxyhydrate	ZS		Pilot project for changing annotations w/o petition		Disc doc TBD

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

### Agenda

- Approve notes from October 21, 2014
- Review work agenda for the fall/winter semester. Assign discussion dates
  - 2016 Sunset - Ferric Phosphate (CBe)
  - 2016 Sunset - Hydrogen Chloride (JFo) - new volunteer needed for transition
  - Petition - Exhaust Gas (FT) - Discuss TR sufficiency
  - Petition - Allyl Isothiocyanate (HA) - Discuss TR sufficiency
  - Petition - Laminarin (ZS) - TR currently in development
  - Petition - Calcium Sulfate (ZS) - no TR, not ready to vote this meeting but will schedule for future call.
  - Petition - 3-decene-2-one (CBe) - Discuss petition sufficiency and TR request
  - Discussion document - Contamination in Farm Inputs (JFe) - guest speakers, next steps and transition plan
- 2017 Sunsets (refer to table) - Assign transition members to work with JFe and JFo on their assignments for 2017 sunsets. Schedule materials for discussion: Materials that need to be reassigned:
  - Potassium Bicarbonate
  - EPA List 4 - Alkylphenol ethoxylates
  - Ethylene
  - Ash from manure burning (.602)
  - Soap, insecticidal
  - Strychnine (.602)
  - Tobacco dust (.602)
  - Arsenic (.602)
  - Lead salts (.602)
  - Sodium fluoaluminatate (.602)
  - Sodium silicate
  - Sucrose Octanoate esters
  - Vitamin D3
- Adjourn

### Discussion

- **Crops Subcommittee notes** of October 21, 2014 approved with no changes.
- **MA** will add extra calls and change the date of the Feb 3 call to Feb 2
- **Review work agenda for the fall/winter semester. Assign discussion dates**
  - **2016 Sunset - Ferric Phosphate (CBe)** - Assigned discussion and vote Dec 16
  - **2016 Sunset - Hydrogen Chloride (JFo)** - FT will take over presentation of this material at the spring meeting. Assigned discussion and vote Dec 16
  - **Petition - Exhaust Gas (FT)** - Assigned TR sufficiency, discussion of checklist, and vote for Dec 2

- **Allyl Isothiocyanate (HA) - Petitioned.** Petition was found sufficient in April 2014. Synthetic substance allowed for use as a fumigant. The lead noted that the TR was found sufficient and thorough and is one of the better TRs they've received. Will discuss checklist and vote Dec 2.
- **Petition - Laminarin (ZS)** - TR currently in development. Will discuss TR Jan 6, if available.
- **Petition - Calcium Sulfate (ZS)** - No TR requested. The HS will discuss and the checklist and vote on Dec 16
- **Petition - 3-decene-2-one (CBe)** - Discussion of petition sufficiency and TR request scheduled for Dec 2
- **Discussion document** - Contamination in Farm Inputs (JFe) - guest speakers, next steps and transition plan. Will Britton will be invited to Dec 16 call.
- **2017 Sunsets (refer to list and table below)** - The group assigned transition members to work with JFe and JFo on their assignments for 2017 sunsets, and scheduled the discussion for materials that are not waiting for TRs (Dec 16 and Jan 6). The CS Chair suggested assigning any 205.602 materials to a CS alumna and not to new members. Materials that will be passed from an outgoing NOSB member will be added to the discussion schedule first.
  - **Potassium Bicarbonate (JFe to HA)**
  - **EPA List 4 - Alkylphenol ethoxylates (JFe to ZS)**
  - **Ethylene (JFe to HA)**
  - **Ash from manure burning (.602) (CBo)**
  - **Soap, insecticidal**
  - **Strychnine (.602)**
  - **Tobacco dust (.602) (CBo)**
  - **Arsenic (.602) (FT)**
  - **Lead salts (.602) (FT)**
  - **Sodium fluoaluminatate (.602) (ZS)**
  - **Sodium silicate**
  - **Sucrose Octanoate esters**
  - **Vitamin D3**
- **The meeting was adjourned**

## [Previous CS Notes](#)

### Future Call Schedule:

Oct 21, 2014 2:00 ET

Continue discussion about 2015 and 2016 sunset reviews  
Review public comments

Nov 4, 2014 2:00 ET - (cancelled-Veteran's Day)

Nov 18, 2014 2:00 ET

Vote on calcium sulfate - deferred

Dec 2, 2014. 2:00 ET

**Contamination in Farm Inputs (JFe)** - Guest speaker: Diana Tracy, Antech Lab, OR  
**3-decene-2-one (CBe)** - Discuss petition sufficiency and TR request  
**Exhaust Gas (FT)** - Discuss TR sufficiency and checklist, and vote  
**Allyl Isothiocyanate (HA)** - Discuss checklist/vote

Dec 16, 2014 2:00 ET

**2016 Sunset Ferric Phosphate (CBe)** - Discuss and vote (?)  
**2016 Sunset - Hydrogen Chloride (JFo/FT)** - Discuss and vote.  
**Exhaust Gas (FT)** - Discuss checklist and vote.  
**Calcium Sulfate (ZS)** - Discuss checklist and vote  
**Discuss 2017 sunsets with no TRs**

Jan 6, 2015 2:00 ET

**Discuss 2017 sunsets with no TRs**

**Laminarin** - Discuss TR

Jan 20, 2015 2:00 ET

Feb 2 2:00 ET (moved from Feb 3 to Monday Feb 2)

Feb 17, 2015 2:00 ET

Feb 24, 2015 2:00 ET - Additional call

Mar 3, 2015 2:00 ET

Mar 17, 2015 2:00 ET

Apr 7, 2015 2:00 ET

Apr 21, 2015 2:00 ET

Spring 2015 Milestones	Target date
NOSB Training	Feb 4-5, 2015
NOP - Complete Spring 2015 NOSB meeting tentative agenda	Feb 7, 2015
NOSB - Spring 2015 proposals due to NOP	Feb 25, 2015
NOP - Post proposals, Publish FRN, Open public comment	Mar 9, 2015
Discuss work agendas on ES call	Mar 13, 2015
Public comment closes	Apr 6, 2015
Work agendas finalized on ES call (last call before spring mtg)	Apr 10, 2015
NOP - Send compiled public comments to NOSB	Apr 13, 2015
Spring 2015 NOSB meeting - La Jolla, CA	Week of April 27 - 31

**2017 Sunsets (TR requests)**

**Summary: Spr 2015 Review: Fall 2015 (Most TRs expected January 2015)**

Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a> Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015 Review: Fall 2015
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y	TR requested 08 15 14		
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP Y	TR requested 08 15 14		
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	TR requested 08 15 14. Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	TR requested 08 15 14. Focus on alternatives		

EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR requested 08 15 14 for Alkylphenol ethoxylates		
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR requested 08 15 14 TR combined with Soap-based algicide/demossers 205.601(a)		
Soap-based algicide/demossers 205.601(a)	FT	1994 TAP Y	TR requested 08 15 14 TR combined with Herbicides, soap-based 205.601(b)		
Isopropanol			Draft TR sent to CS 09 24 14. LS: 205.603(a). TR suff due 11 24 14		
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

**2017 Sunsets (No TRs)**

<b>Substance</b>	<b>Cont act</b>	<b>TR</b>	<b>New TR Rqst</b>	<b>Misc notes</b>	<b>Vote</b>	<b>Meeting</b>
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“
Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“

Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“
Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“
Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“

Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 December 02, 2014 2:00 pm ET**

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

**Guest Speakers:** Diana Tracy, Antech Lab, OR

**Absent:** John Foster (JFo)

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

**Work Agenda**

2016 Sunsets					
Summary: Fall 2014 Review: Spr 2015					
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 additional 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>	NA	Summary: Fall 2014 Review: Spr 2015
Hydrogen chloride 205.601(n) CAS # 7647-01-0	JFo	<a href="#">2014 Lmtd Scope TR</a>  <a href="#">2003 TAP</a>	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition NOSB rec</a>  Request for Lmtd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.		Summary: Fall 2014 Review: Spr 2015

2017 Sunsets (TR requests)					
Summary: Spr 2015 Review: Fall 2015 See Table Below					
Substance	Contact	TR request?	Notes	Vote	Meeting
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>  Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015

Isopropanol (Alcohols) 205.601(a)	FT		Draft TR sent to CS and LS 09 24 14. CW is lead for LS LS: 205.603(a). <b>TR suff due 11 24 14</b>		
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP 2014 TR	TR requested 08 15 14. TR sent to CS 12 04 14. <b>TR suff due 02 04 15</b>		

Petitioned Substances					
Substance	Contact	TR request?	Notes	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmt'd Scope	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. CS requested Lmt'd scope TR 08 06 14. (expected Feb 2015)		TBD
<a href="#">Exhaust gas</a> (Carbon Monoxide) List at §205.601	FT	<a href="#">2014 TR</a>	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. TR in development (expected September 2014). TR sent to CS 10 0 6 14. Sufficiency due 12 05 14. TR found sufficient 12 02 14.		Spr 2015
<a href="#">Allyl isothiocyanate (AITC)</a> List at 205.601	HA	<a href="#">2014 TR</a>	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 ~ 04 01 14. TR in development (expected September 2014). TR sent 10 06 14. TR found sufficient 11 18 14.		Spr 2015
<a href="#">Calcium Sulfate</a> List at 205.601	ZS	N	Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14. Petition found sufficient 09 02 14. No TR request.		Spr 2015
<a href="#">3-decene-2-one</a> <a href="#">CAS # 10519-33-2</a> List at 205.601	CBe	N	Petition sent to CS on 09 24 14. Questions or request for TR due 11 24 14. Petition found sufficient 12 02 14. No TR request		TBD
Inert Ingredients					
Substance	Contact	TR reqstd?	Notes*	Vote	Meeting

Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Verbal Report Spr 2015
EPA List 3 in passive pheromone dispensers	JFe	Y	TR request 07 15 14. Subcommittee voted 4-3 to wait until they are scheduled to sunset, 2018.		TBD
Other Projects					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	CBo/JFe	DD			Disc doc? Spr 2015
Sodium carbonate peroxyhydrate	ZS		Pilot project for changing annotations w/o petition		Disc doc TBD

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

### Agenda

- Approve notes from November 18, 2014
- Contamination in Farm Inputs (JFe) - Guest speaker: Diana Tracy, Antech Lab, OR
- 3-decene-2-one (CBe) - Discuss petition sufficiency and TR request
- Exhaust Gas (FT) - Discuss TR sufficiency and checklist
- Allyl Isothiocyanate (HA) - Discuss checklist/vote
- Adjourn

### Discussion

- **Crops Subcommittee notes** of November 18, 2014 approved with no changes.
- Guest speaker: Diana Tracy, Antech Lab, OR. Ms. Tracy described her 30+ year career and background in organic which included working as an advisor for OMRI and conducting residue testing for Oregon Tilth. In an effort to focus the direction of the Contamination in Farm Inputs document the CS sent a list of questions to Ms. Tracy prior to the call, which she addressed (see questions below). Members were supportive of moving forward with a document that could include developing a framework/guidance for best practices for how the organic community uses compost materials. The goal is to raise awareness without it being too burdensome on the community. The NOP noted that since fertilizer is regulated by OFPA, the USDA would have limited authority. The Chair asked for a volunteer from the continuing members to take over the lead role for this project, since JFe is transitioning off the Board.

1. *What kinds of pesticide residues do you expect to see in municipal/commercial composts?*
2. *What composting and cropping practices can reduce pesticide residues in soil and crops?*
3. *When composting/cropping are used to reduce pesticide residues, do they break down the pesticides or make them unavailable, and if the former, what are the products of the degradation?*

In response to above questions, DT noted that a number of pesticides have been found, including the persistent pyridine herbicide (chlorpyralid, trichopyr, etc.) neonicotinoids, pyrethroids, and Treflan.

Many of these are difficult to test, although there are several factors that mitigate concentrations i.e. application rates vs. volume of soil. Other factors that affect concentration levels include how the compost is used (higher concentrations are found in mulch or sheet composting) or aged (longer aging time helps to reduce pesticide activity). Testing is very expensive, and it is difficult to control the inputs into commercial compost. From her point of view, it might be more important to focus on problems with heavy metals in manure or other inputs, since pesticides do break down but metals can accumulate. The group discussed the potential for developing guidelines for managing compost, which has been tried in the past but was found to be costly. The NOP noted that currently this practice is not in use, although the EPA is in the process of re-registering a number of the herbicides.

4. *Water contamination and treatment, particularly wastewater contamination with pesticides, pharmaceuticals, antibiotics, etc. (re. new study, "[Treated Wastewater Irrigation: Uptake of Pharmaceutical and Personal Care Products by Common Vegetables under Field Conditions](#)," published in Environmental Science & Technology*

This topic was outside the expertise of the guest speaker and was not discussed

- 3-decene-2-one (CBe) - Petitioned for addition to 205.601. Labeled for post-harvest use. The petition included some redacted information about formulations, but was deemed sufficient. The group will discuss the petition further on January 6, and will likely not request a TR.
- Exhaust Gas (FT) - Members discussed the checklist that was circulated just prior to the call. The group discussed some additional language regarding Category 1 on the checklist (Probability of environmental contamination during use and misuse). The lead felt that there was some inaccurate information in the TR but the group will pose some questions for public comment to glean more info. The CS members deemed the TR sufficient.
- Allyl Isothiocyanate (HA) - Discuss checklist/vote - deferred to next call
- **The meeting was adjourned**

### [Previous CS Notes](#)

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

Nov 18, 2014 2:00 ET

Vote on calcium sulfate - deferred

Dec 2, 2014 2:00 ET

Contamination in Farm Inputs (JFe) - Guest speaker: Diana Tracy, Antech Lab, OR

3-decene-2-one (CBe) - Discuss petition sufficiency and TR request

Exhaust Gas (FT) - Discuss TR sufficiency and checklist

Allyl Isothiocyanate (HA) - Discuss checklist/vote - deferred to next call

Dec 16, 2014 2:00 ET

Allyl Isothiocyanate (HA) - Discuss checklist/vote

2016 Sunset Ferric Phosphate (CBe) - Discuss and vote (?)

2016 Sunset - Hydrogen Chloride (JFo/FT) - Discuss and vote

Exhaust Gas (FT) - Discuss checklist and vote.

Calcium Sulfate (ZS) - Discuss checklist and vote

Discuss 2017 sunsets with no TRs

Jan 6, 2015 2:00 ET

Discuss 2017 sunsets with no TRs

Laminarin - Discuss TR if ready

3-decene-2-one (CBe) - Discuss cklist

Jan 20, 2015 2:00 ET

Feb 2 2:00 ET (moved from Feb 3 to Monday Feb 2)

Feb 17, 2015 2:00 ET  
 Feb 24, 2015 2:00 ET - Additional call  
 Mar 3, 2015 2:00 ET  
 Mar 17, 2015 2:00 ET  
 Apr 7, 2015 2:00 ET  
 Apr 21, 2015 2:00 ET

Spring 2015 Milestones	Target date
NOSB Training	Feb 4-5, 2015
NOP - Complete Spring 2015 NOSB meeting tentative agenda	Feb 7, 2015
NOSB - Spring 2015 proposals due to NOP	Feb 25, 2015
NOP - Post proposals, Publish FRN, Open public comment	Mar 9, 2015
Discuss work agendas on ES call	Mar 13, 2015
Public comment closes	Apr 6, 2015
Work agendas finalized on ES call (last call before spring mtg)	Apr 10, 2015
NOP - Send compiled public comments to NOSB	Apr 13, 2015
Spring 2015 NOSB meeting - La Jolla, CA	Week of April 27 - 30

2017 Sunsets (TR requests)					
Summary: Spr 2015    Review: Fall 2015 (Most TRs expected January 2015)					
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y	TR requested 08 15 14		
Vitamin B1, Vitamin C, Vitamin E	CBe	1995 TAP Y	TR requested 08 15 14. Combined TR. Focus on uses and alternatives.		
Potassium bicarbonate	JFe	1999 TAP Y Lmtd scope	TR requested 08 15 14. Focus on alternatives		
EPA List 4 - Inerts of Minimal Concern	JFe	Y	TR requested 08 15 14 for Alkylphenol ethoxylates		
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR requested 08 15 14 TR combined with Soap-based algicide/demossers 205.601(a)		
Soap-based algicide/demossers 205.601(a)	FT	1994 TAP Y	TR requested 08 15 14 TR combined with Herbicides, soap-based 205.601(b)		

Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe	2011 Y Lmtd Scope	Medium priority. Limited scope on alternatives to degreening		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives		
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006 Y	Both listings. limited scope on inks and their impacts		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	JFe		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	JFo	1994	Low priority		
Strychnine 205.602(h)	JFe		Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	JFe		Low priority		

### 2017 Sunsets (No TRs)

Substance	Cont act	TR	New TR Rqst	Misc notes	Vote	Meeting
Aquatic plant extracts 205.601(j)	CBe	2006	N (07 01)			“
Arsenic 205.602(b)	JFe		N (07 01)			“

Calcium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Chlorine dioxide 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Copper sulfate 205.601(i)	ZS	2011	N (05 20)	LS: 205.603(b)		“
Coppers, fixed 205.601(i)	ZS	2011	? (05 20)			“
Elemental sulfur 205.601(e) 205.601(i) 205.601(j)	HA	1995	N (06 03)			“
Humic acids 205.601(j)	CBe	2006	N (07 01)			“
Lead salts 205.602(d)	JFe		N (07 01)			“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011	N (07 01)			“
Liquid fish products 205.601(j)	CBe	2006	N (07 01)			“
Magnesium sulfate 205.601(j)	CBe	2011	N (07 01)	HS: 205.605(a) LS: 205.603(a)		“
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006	Y Low Priority (06 17)			“
Oils, horticultural 205.601(e) 205.601(i)	HA	1995	N (06 03)			“
Pheromones 205.601(f)	HA	2012	N (06 03)			“

Plastic mulch and covers (petroleum-based other than polyvinylchloride (PVC)) 205.601(b)	CBo	1995	N (06 17)			“
Potassium chloride 205.602(e)	ZS	1995	N (05 20)	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFo		N (06 17)			“
Sodium hypochlorite 205.601(a)	FT	2011	N (07 01)	HS: 205.605(b) LS: 205.603(a)		“
Sodium silicate 205.601(l)	JFo	2011	N (06 17)			“
Soluble boron products 205.601(j)	CBe	1995	N (07 01)			“
Sucrose octanoate esters 205.601(e)	JFo	2005	N (06 17)	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	CBe	2010	N (07 01)			“
Vitamin D3 205.601(g)	JFo	2011	N (06 17)			“

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 December 16, 2014 2:00 pm ET**

**Present:** Zea Sonnabend, Chair (ZS), Francis Thicke, Vice Chair (FT), Harold Austin (HA), Colehour Bondera (CBo), Jay Feldman (JFe), Tom Chapman (TC) - sitting in

**Absent:** Carmela Beck (CBe), John Foster (JFo)

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

**Work Agenda**

2016 Sunsets					
Summary: Fall 2014    Review: Spr 2015					
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 additional 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)	JFe/FT	<a href="#">2014 Lmtd Scope TR</a>  <a href="#">2003 TAP</a>	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. <a href="#">2002 Petition NOSB rec</a>  Request for Lmtd scope TR sent to the NOP 01 21 14. TR sent to CS 05 16 14. Sufficiency due 07 16 14. TR found sufficient 06 17 14. CS will include questions in the fall 2014 doc for posting.		Summary: Fall 2014 Review: Spr 2015

2017 Sunsets (TR requests)					
Summary: Spr 2015    Review: Fall 2015    See Table Below					
Substance	Contact	TR request?	Notes	Vote	Meeting
Ethanol (Alcohols) 205.601(a)	FT	<a href="#">1995 TAP</a>  Y	TR sent to CS 01 15 14. TR sufficiency due July 15, 2014. TR found sufficient 08 05 14.		Summary: Spr 2015 Review: Fall 2015

Isopropanol (Alcohols) 205.601(a)	FT	2014 TR	Draft TR sent to CS and LS 09 24 14. CW is lead for LS LS: 205.603(a). TR suff due 11 24 14. TR found sufficient 12 16 14		“
Lime sulfur 205.601(e) 205.601(i)	HA	1995 TAP 2014 TR	TR requested 08 15 14. TR sent to CS 12 04 14. TR suff due 02 04 15		“
Hydrogen peroxide 205.601(a) 205.601(i)	ZS	1995 TAP Y	TR requested 08 15 14. TR Expected Jan/Feb 2015		“
Vitamin B1, Vitamin C, Vitamin E 205.601(j)	CBe	1995 TAP Y	TR requested 08 15 14. Combined TR. Focus on uses and alternatives.		“
Potassium bicarbonate 205.601(i)	∓Fe/HA	1999 TAP Y Lmtd scope	TR requested 08 15 14. Focus on alternatives. Limited scope TR in development (expected mid-Dec)		“
EPA List 4 - Inerts of Minimal Concern	∓Fe/ZS	Y	TR requested 08 15 14 for Alkylphenol ethoxylates. TR expected Jan/Feb 2015; Nonylphenols only		“
Herbicides, soap-based 205.601(b)	FT	1996 TR Y	TR requested 08 15 14 TR combined with Soap-based algicide/demossers 205.601(a). TR Expected Jan/Feb 2015		“
Soap-based algicide/demossers 205.601(a)	FT	1994 TAP Y	TR requested 08 15 14 TR combined with Herbicides, soap-based 205.601(b). TR Expected Jan/Feb 2015		“

Petitioned Substances					
Substance	Contact	TR request?	Notes	Vote	Meeting
<a href="#">Laminarin</a> List at 205.601	ZS	Y Lmtd Scope	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. CS requested Lmt'd scope TR 08 06 14. (expected Feb 2015)		TBD

<a href="#">Exhaust gas</a> (Carbon Monoxide) List at §205.601	FT	<a href="#">2014 TR</a>	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. TR in development (expected September 2014). TR sent to CS 10 0 6 14. Sufficiency due 12 05 14. TR found sufficient 12 02 14.	12 16 14	Spr 2015
<a href="#">Allyl isothiocyanate (AITC)</a> List at 205.601	HA	<a href="#">2014 TR</a>	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 ~ 04 01 14. TR in development (expected September 2014). TR sent 10 06 14. TR found sufficient 11 18 14.	12 16 14	Spr 2015
<a href="#">Calcium Sulfate</a> List at 205.601	ZS	N	Petition sent to CS on 06 16 14. Questions or request for TR due 08 19 14. Petition found sufficient 09 02 14. No TR request.		Spr 2015
<a href="#">3-decene-2-one</a> <a href="#">CAS # 10519-33-2</a> List at 205.601	CBe	N	Petition sent to CS on 09 24 14. Questions or request for TR due 11 24 14. Petition found sufficient 12 02 14. No TR request		TBD

### Inert Ingredients

Substance	Contact	TR reqstd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts –report on progress with Design for the Environment (DfE)	NA	Verbal Report Spr 2015

### Other Projects

Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs	CBo/JFe	DD			Disc doc Spr 2015
Annotation Changes (Sodium carbonate peroxyhydrate)	ZS		Pilot project for changing annotations w/o petition		Disc doc TBD

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

### Agenda

- Approve notes from December 2, 2014
- Isopropanol TR sufficiency (TF)
- Discuss 2017 sunsets with no TRs
- Contamination in Farm Inputs next steps (JFe)

- Allyl Isothiocyanate (HA) - Discuss checklist/vote
- 2016 Sunset Ferric Phosphate (CBe) - Discuss and vote (?)
- 2016 Sunset - Hydrogen Chloride (JFo/FT) - Discuss and vote
- Exhaust Gas (FT) - Discuss checklist and vote.
- Calcium Sulfate (ZS) - Discuss checklist and vote
- Adjourn

#### Discussion

- **Crops Subcommittee notes** of December 2, 2014 were approved with no changes.
- **Isopropanol TR sufficiency (FT)**. The lead reviewer deemed the TR sufficient. The CS Chair will notify the NOP of the outcome.
- **Discuss 2017 sunsets with no TRs**. Five of the 2017 materials were reassigned from the two members who are rotating off: four (Soaps, insecticidal, Sodium silicate, Sucrose octanoate esters, and Vitamin D3) were transferred from JFo to PD, and one (Strychnine) from JFe to ZS. The Chair noted that the task for the 2017 sunsets is to review the past materials and add questions for public comment. The 2017 Sunset materials were added to the discussion schedule for the next several calls (see below).
- **Contamination in Farm Inputs (JFe)** - The lead reviewer, who will be transferring this project to CBo upon his departure, discussed the next steps for this project. Based on input from the guest speaker on the last call, Diana Tracy, the lead feels that it would be most useful to identify pathways for contaminants and prioritize them. The leads will discuss this further on the Jan 20 call.
- **Allyl Isothiocyanate (AITC) (HA)** - The lead reviewer noted that this material is being petitioned for addition to the NL, and is identified as synthetic. Members discussed essentiality and alternatives, in particular the natural sources of mustard meal or mustard cover crops, and proceeded to a vote.

#### Vote:

Motion to classify AITC gas as synthetic

Motion by: HA

Seconded by: FT

Additional discussion: None

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

Motion to add AITC as petitioned to §205.601

Motion by: HA

Seconded by: CBo

Discussion: The lead reviewer noted that he included feedback from JFe in the checklist but added it in the wrong location. He will move it to the correct section and resend the document to the group for review, but noted that this will not affect what they are voting on.

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

- **2016 Sunset Ferric Phosphate (CBe)** - Discuss and vote (?) - deferred to next call
- **2016 Sunset - Hydrogen Chloride (JFo/FT)** - Discuss and vote - deferred to next call.
- **Exhaust Gas (FT)** - The lead noted that he sought feedback from the dairy community and did not find much support for adding this material to the list. He also noted that there are still some unknowns with regard to this substance such as how it affects soil and how it might affect non-target species. A member noted that as well as Vitamin D, for use as rodent bait. The group proceeded to a vote:

#### Vote:

Motion to classify exhaust gas as synthetic

Motion by: FT

Seconded by: HA

Additional discussion: none

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

Motion to add Exhaust gas at §205.601

Motion by: FT

Seconded by: HA

Additional discussion: The CS Chair asked that the introduction section for checklist be fleshed out more to include more background, including reasons as to why the petition was initially deemed insufficient and was sent back for more information. The Chair also asked that the questions that were posed to the EPA be included here, as well as a discussion of alternatives.

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

- **Calcium Sulfate (ZS) - The lead** provided a partial checklist for discussion and indicated that she will complete it for the next call so the group can vote. She noted that the petition was written well and was complete. Calcium sulfate is synthetic, and similar to gypsum, but it is recaptured from flue gases produced by burning coal. The petitioners want to add it to the NL so gypsum can be recycled for use in organic fields. There are environmental concerns resulting from transport. A document from the National Institute of Environmental Health Sciences (NIEHS) was included in the petition, which contained an extensive survey of health effects of breathing in gypsum from wallboard. The findings indicated that the additives, and not the gypsum, in wallboard was the hazard. A member added that the information from the EPA fact sheet about hazards based on variations in use and manufacture should also be cited. The CS Chair noted that even without a TR the NOSB has a complete picture of this material.
- **The meeting was adjourned**

### [Previous CS Notes](#)

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

Dec 2, 2014 2:00 ET

Contamination in Farm Inputs (JFe) - Guest speaker: Diana Tracy, Antech Lab, OR  
3-decene-2-one (CBe) - Discuss petition sufficiency and TR request  
Exhaust Gas (FT) - Discuss TR sufficiency and checklist  
Allyl Isothiocyanate (HA) - Discuss checklist/vote - deferred to next call

Dec 16, 2014 2:00 ET

Allyl Isothiocyanate (HA) - Discuss checklist/vote - completed  
2016 Sunset Ferric Phosphate (CBe) - Discuss and vote (?) deferred to Jan 6  
2016 Sunset - Hydrogen Chloride (JFo/FT) - Discuss and vote - deferred to Jan 6  
Exhaust Gas (FT) - Discuss checklist and vote - completed  
Calcium Sulfate (ZS) - Discuss checklist  
Discuss 2017 sunsets with no TRs

Jan 6, 2015 2:00 ET

Calcium Sulfate (ZS) - vote  
2016 Sunset - Hydrogen Chloride (FT) - Discuss proposal and vote  
2016 Sunset - Ferric Phosphate (CBe) - Discuss proposal and vote  
Laminarin (ZS) - Discuss TR if ready  
3-decene-2-one (CBe) - Discuss cklist  
2017 Sunset - Ethanol (FT) - discuss summary/questions if any  
2017 Sunset - Isopropanol (FT) - discuss summary/questions if any  
2017 Sunset - Strychnine (ZS) - discuss summary/questions if any  
2017 Sunset - Sodium fluoaluminate, hydrated lime, Potassium chloride (ZS)- discuss summary/questions if any

Jan 20, 2015 2:00 ET

2017 Sunsets - Elemental sulfur, Oils (horticultural), Pheromones (HA) - discuss summary/questions if any (may try to discuss on Jan 6<sup>th</sup>)

2017 Sunset - Lime sulfur (HA) - Discuss TR sufficiency

2017 Sunsets - Ash from manure burning, Tobacco dust (nicotine sulfate), and Arsenic (if time allows) (CBo) - discuss summary/questions if any

2017 Sunset - Lead salts, Soaps, ammonium, Sodium hypochlorite (FT) - discuss summary/questions if any

Contaminants in farm inputs (CBo) - continue discussion

2017 Sunsets - Aquatic plant extracts, Humic acids, Lignin sulfonate, Liquid fish products, Magnesium sulfate (CBe) - discuss summary/questions if any

Feb 2, 2:00 ET (moved from Feb 3 to Monday Feb 2)

2017 Sunsets - Ammonium carbonate, Newspaper or other recycled paper, Plastic mulch and covers (CBo) - discuss summary/questions if any

2017 Sunsets - Calcium hypochlorite, Chlorine dioxide, Sodium hypochlorite (FT) - discuss summary/questions if any

2017 Sunsets - Coppers (fixed), Copper sulfate (ZS) - discuss summary/questions if any

Feb 17, 2015 2:00 ET

2017 Sunsets - Hydrogen peroxide (ZS) - Discuss TR Sufficiency if available

2017 Sunsets - Herbicides, soap-based (FT) - Discuss TR Sufficiency if available

2017 Sunsets - Soap-based algicide/demosers (FT) - Discuss TR Sufficiency if available

2017 Sunsets - Soluble boron products, Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt (CBe) - discuss summary/questions if any

2017 Sunsets - Soaps, insecticidal, Sodium silicate, Sucrose octanoate esters, Vitamin D3 (PD) - discuss summary/questions if any

Feb 24, 2015 2:00 ET - Additional call

2017 Sunsets - Sticky traps/barriers Microcrystalline cheesewax (CBo) - discuss summary/questions if any

2017 Sunsets - Vitamin B1, Vitamin C, Vitamin E (CBe) - Discuss TR Sufficiency if available

2017 Sunsets - Potassium bicarbonate 205.601(i) (?) - Discuss TR Sufficiency if available

2017 Sunsets - Ethylene (?) - discuss summary/questions if any

2017 Sunsets - EPA List 4 - Inerts of Minimal Concern (?) -Discuss TR Sufficiency if available

Mar 3, 2015 2:00 ET

Mar 17, 2015 2:00 ET

Apr 7, 2015 2:00 ET

Apr 21, 2015 2:00 ET

Spring 2015 Milestones	Target date
NOSB Training	Feb 4-5, 2015
NOP - Complete Spring 2015 NOSB meeting tentative agenda	Feb 7, 2015
NOSB - Spring 2015 proposals due to NOP	Feb 25, 2015
NOP - Post proposals, Publish FRN, Open public comment	Mar 9, 2015
Discuss work agendas on ES call	Mar 13, 2015
Public comment closes	Apr 6, 2015
Work agendas finalized on ES call (last call before spring mtg)	Apr 10, 2015

NOP - Send compiled public comments to NOSB	Apr 13, 2015
Spring 2015 NOSB meeting - La Jolla, CA	Week of April 27 - 30

2017 Sunsets (No TRs)					
Newspaper or other recycled paper 205.601(b) 205.601(c)	CBo	2006 Y	Both listings. Rqstd limited scope on inks and their impacts. Not contracted.		
Soaps, ammonium 205.601(d)	FT	1996 Y			
Sticky traps/barriers 205.601(e)	CBo	Y Lmtd Scope	Limited scope. Not contracted.		
Ammonium carbonate 205.601(e) (used in traps)	CBo	1995	Low priority		
Ash from manure burning 205.602(a)	<del>JFe</del> /CBo		Low priority		
Hydrated lime 205.601(i)	ZS	2002	Low priority		
Soaps, insecticidal 205.601(e)	<del>JFe</del> /PD	1994	Low priority		
Tobacco dust (nicotine sulfate) 205.602(i)	<del>JFe</del> /CBo		Low priority		
Aquatic plant extracts 205.601(j)	CBe	2006			“
Arsenic 205.602(b)	<del>JFe</del> /FT				“
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			“
Humic acids 205.601(j)	CBe	2006			“
Lead salts 205.602(d)	JFe/FT				“
Lignin sulfonate 205.601(j) 205.601(l)	CBe	2011			“
Liquid fish products 205.601(j)	CBe	2006			“
Magnesium sulfate 205.601(j)	CBe	2011	HS: 205.605(a) LS: 205.603(a)		“
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 chloride 205.602(e)	ZS	1995	HS: 205.605(a)		“
Sodium fluoaluminate 205.602(f)	JFe/ZS				“
Sodium hypochlorite 205.601(a)	FT	2011	HS: 205.605(b) LS: 205.603(a)		“

Sodium silicate 205.601(l)	JFe/PD	2011			“
Soluble boron products 205.601(j) (Micronutrients)	CBe	1995			“
Strychnine 205.602(h)	JFe/ZS				
Sucrose octanoate esters 205.601(e)	JFe/PD	2005	LS: 205.603(b)		“
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j) (Micronutrients)	CBe	2010			“
Vitamin D3 205.601(g)	JFe/PD	2011			“
Boric acid	CBo	1995 TAP Y			
Ethylene 205.601(k)	JFe/HA	2011 Y Lmtd	Medium priority. Limited scope on alternatives to degreening. Not contracted.		
Microcrystalline cheesewax	CBo	Y Lmtd Scope	Limited scope on alternatives. Not contracted.		