

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 5, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Harold Austin (HA); Colehour Bondera (CBo); Carmela Beck (CBe); Jean Richardson (JR) - sitting in; Tracy Favre (TF) - sitting in

Absent: none

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

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Scheduled for disc/ Reviewed	Meeting
Copper sulfate 205.601(a) 205.601(e)	ZS	2015 LS TR	Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016
Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	Y	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015	Jan 19	Spr 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015	Feb 2	Spr 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016

Petitioned Substances					
Substance	Contact	TR request?	Notes	Scheduled for disc/ Vote	Meeting
Ash from Manure Burning 205.602(a)	CBe		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. To be revisited after fall 2015.	Jan 5	Spr 2016

Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015)	Feb 2 disc TR if available	TBD
Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Waiting for LS to review	Proposal Spr 2016
Hypochlorous Acid 205.605 and 205.601	HA	2015	NOP Policy Memo 14-3: Electrolyzed Water (PDF) Petition sent to HS 06 03 15. Response/request for TR due 08 03 15. TR request sent to NOP 07 21 15. TR sent to HS 08 13 15. TR suff due 10 13 15. TR suff discussion scheduled for 12 01 15 in HS	Jan 19	Spr 2016
Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1/Jan 19	TBD
Calcium Chloride annotation change 205.602	CBe		Petition sent to CS 11 02 15. Petition suff/ TR Request due 01 04 16	Jan 19	TBD
1-methylcyclopropene (1-MCP). 205.601	ZS/HA		Petition sent to CS 11 30 15. Petition suff/ TR Request due 02 01 16	Feb 2	TBD
Inert Ingredients					
Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	Contact	Doc type	Notes*	Disc/Vote	Meeting
Contamination Issues in Farm Inputs	CBo/FT		Report?	Mar 15	TBD

Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	ZS	DD?		Feb 2	TBD
Prohibition of NPEs in Inerts annotation change	ZS	DD	DD leading toward annotation change. NOP already approved/		Spr 2016
Newspaper - annotation change	ZS		Will write justification to send to ES and NOP.		TBD
Research Priorities	All	NA	RP's due to MS Aug 2016		Fall 2016

* **Yellow highlight** indicates Subcommittee action needed ***Highlight** indicates review completion

Agenda

- Approve Crops Subcommittee notes of December 15
- Calcium Chloride (CBe): Discuss 2018 sunset questions
- Ash from Manure Burning (CBe): Discuss petition
- Calcium Chloride annotation change (CBe): Petition sufficiency, need for TR?
- Contamination Issues in Farm Inputs (CBo/FT) - Discuss project
- Squid and Squid Byproducts (CBe) - Discuss TR if available
- Copper sulfate (ZS) - Discuss 2018 sunset questions
- Other items
- Adjourn

Discussion

- **Crops Subcommittee notes of December 15** approved with a change to the text regarding hypochlorous acid.
- **Calcium Chloride 208 sunset (CBe)**. The lead summarized the material, its uses, and previous reviews. The lead researched information from two Material Review Organizations (MROs) and noted that there are ~30 registered products containing calcium chloride. The draft review will be updated with some potential questions and will be finalized for posting for the April 2015 meeting.
- **Calcium Chloride annotation change (CBe)**. The group discussed the 2015 petition with respect to the 2005 petition, which was rejected by a previous Board because it failed to meet the OFPA criteria. Members discussed the difference(s) between the two petitions and whether or not there was any new information. The CS will revisit this on the next call.
- **Ash from Manure Burning (CBe)**: The lead summarized the changes made since the previous discussion, and the CS moved to a vote on this material.

Motion to annotate ash from manure burning (§205.602, nonsynthetic substances prohibited for use in organic crop production) with the following annotation: “except where the combustion reaction does not involve the use of synthetic additives and is controlled to separate and preserve nutrients.”

Motion by: CBe

Seconded by: CBo

Additional Discussion: none

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

The motion failed, thus the Subcommittee supports retaining the existing prohibition of manure ash in organic crop production.

- **Contamination Issues in Farm Inputs (CBo/FT).** The CS discussed this project in light of the public comment from the last meeting, and the path forward. The lead feels there are emerging issues with regard to this and the CS should continue to work on this issue. A member noted that commenters mentioned contamination issues related to irrigation water, but pointed out that water is not restricted by the regulations as are other inputs, so although the NOSB could address this elsewhere, it is not germane to this document. The lead reviewer will co-lead this with one of the new NOSB members and will present this to the CS in March.
- **Squid and Squid Byproducts (CBe).** Deferred to Feb 2 call. Awaiting TR.
- **Copper sulfate - 2018 sunset (ZS).** The lead noted that this listing pertains to rice and control of tadpole shrimp and algae, and that it is used in a very specific and narrow range of conditions. She added that sodium carbonate peroxyhydrate was suggested as an alternative, but research found it was not successful. The CS will add a couple of questions for posting, hoping to glean comments from rice growers. The lead asked the NOP to add the link to the review of copper from last meeting.
- **Other items** - none.
- **The meeting was adjourned**

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

December 15, 2015

Ozone gas (FT): Discuss 2018 sunset questions

Calcium Chloride (CBe): Discuss 2018 sunset questions

Ash from Manure Burning (CBe): Discuss petition

Hypochlorous Acid (HA): TR sufficiency

Calcium Chloride annotation change (CBe): Petition sufficiency, need for TR

1-methylcyclopropene (1-MCP): Assign lead

January 5, 2016

Calcium Chloride (CBe): Discuss 2018 sunset questions

Ash from Manure Burning (CBe): Discuss petition

Calcium Chloride annotation change (CBe): Petition sufficiency, need for TR?

Discuss Contamination Issues in Farm Inputs (CBo/FT)

Squid and Squid Byproducts (CBe): Discuss TR if available

Copper sulfate (ZS): Discuss 2018 sunset questions

January 19, 2016. (CBe & ZS may miss call due to conflict with hydroponics task force).

Squid and Squid Byproducts (CBe): Discuss TR if available

Calcium Chloride annotation change (CBe): Petition sufficiency, need for TR.

Soy Wax (FT): Discuss proposal

Paracetic Acid (HA): Discuss 2018 sunset questions & TR if available

Hypochlorous Acid - discuss proposal

February 2, 2016

EPA List 3 - Inerts of Unknown Toxicity (ZS) - Discuss 2018 sunset questions & TR if available
Biodegradable Biobased Mulch. Review public comment/memo/original
Squid and Squid Byproducts (CBe)
1-methylcyclopropene (1-MCP) (ZS/HA)

February 16, 2016

March 1, 2016

March 15, 2016

Contamination Issues in farm inputs

April 5, 2016

April 19, 2016

May 3, 2016

May 17, 2016

June 7, 2016

June 21, 2016

July 5, 2016

July 19, 2016

August 2, 2016

August 16, 2016

September 6, 2016

September 20, 2016

October 4, 2016

October 18, 2016

November 1, 2016

November 15, 2016

December 6, 2016

December 20, 2016

Spring 2016 Milestones	Target date
New NOSB member orientation	Feb 4, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
NOSB - Spring 2016 proposals due to NOP	Feb 26, 2016
NOP - Post proposals, Publish FRN, Open public comment	Mar 8, 2016
Discuss work agendas on ES call	Mar 11, 2016
Public comment webinars	??
Public comment closes	Apr 6, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
NOP - Send compiled public comments to NOSB	Apr 11, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
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Absent: Carmela Beck (CBe); Emily Brown Rosen (EBR)

Staff: Michelle Arsenault (MA), Devon Pattillo (DP)

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Discussed/ Reviewed	Meeting
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Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	Y	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015	Jan 19, Feb 2	Spr 2016
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Petitioned Substances					
Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting
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Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015), TR sent to CS 01 13 16. TR suff due 03 14 16	Feb 2	TBD
Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Waiting for LS to review	Proposal Spr 2016
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Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1, Jan 19	TBD
Calcium Chloride annotation change 205.602	CBe		Petition sent to CS 11 02 15. Petition suff/ TR Request due 01 04 16	Feb 2	TBD
1-methylcyclopropene (1-MCP). 205.601	ZS/HA		Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16	Feb 2	TBD
Inert Ingredients					
Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	Contact	Doc type	Notes*	Disc/Vote	Meeting
Contamination Issues in Farm Inputs	CBo/FT		Report?	Mar 15	TBD

Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	ZS	DD?		Feb 2	TBD
Prohibition of NPEs in Inerts annotation change	ZS	DD	DD leading toward annotation change. NOP already approved		Spr 2016
Newspaper - annotation change	ZS		Will write justification to send to ES and NOP.		TBD
Research Priorities	All	NA	RPs due to MS Aug 2016		Fall 2016

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Agenda

- Approve Crops Subcommittee notes of January 5
- Soy Wax (FT): Discuss proposal
- Peracetic Acid (HA): Discuss 2018 sunset questions & TR if available
- Hypochlorous Acid (HA): Discuss proposal
- Other items
- Adjourn

Discussion

- **Crops Subcommittee notes of January 5** were approved with no changes.
- **Soy Wax (FT)**. The CS discussed the draft proposal that was circulated to the members prior to the call. The members discussed the possible inclusion of an annotation: "must be made from non-GMO soybeans." The lead noted that the petitioner has already addressed this in the petition i.e. that the soy wax is made with soy that was not genetically modified. Additionally, this restriction is implied in the organic regulations. Members discussed the need to add the language for emphasis, and chose to do so.

Motion to classify Soy Wax as petitioned as synthetic

Motion by: FT

Seconded by: CBo

Additional Discussion: none

Yes: 4 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Motion to add Soy Wax as petitioned at §205.601(o). As production aids. Soy wax (CAS # 8016-70-4) - for use in log grown mushroom production. Must be made from non-GMO soybeans.

Motion by: FT

Seconded by: CBo

Additional Discussion: none

Yes: 4 No: 0 Abstain: 0 Absent: 1 Recuse: 0

- **Peracetic Acid (HA).** The group discussed the 2018 draft review while waiting for the TR, which is in development. The lead asked about a discrepancy in concentration amounts of peracetic acid (5% vs 6%) between the previous NOSB review and the final rule. The NOP indicated that it was a result of comments received during the proposed rule stage. The CS will revisit this topic on the next call, at which time the Technical Report should be back.
- **Hypochlorous Acid (HA):** The lead presented the material, its uses, and a brief summary of the previous public comment. Hypochlorous Acid (electrolyzed water) is used as an anti-microbial and is an alternative to several sanitizers, including chlorine. This material was petitioned for use for handling, crops and livestock, and all three Subcommittees are reviewing it. The lead noted that the Handling Subcommittee voted to add it to the National List. Additionally, the NOP issued a memo asking the NOSB to review this material and the process by which it is manufactured. The members discussed the sources and manufacturing process and are supportive of hypochlorous acid, as it reduces any potential human health and environmental concerns. The group discussed adding an annotation limiting production of hypochlorous acid to on-site only. The CS will postpone the vote until members can review the petition further, and align its proposal with that of the Handling and Livestock Subcommittees. The NOP added that if the NOSB intends to allow hypochlorous acid for plant disease control that the CS should keep in mind that the National List includes separate paragraphs for plant disease materials (§205.601(i)) and algicides/disinfectants/sanitizers (§205.601(a)). The NOP will consider the following before the next call and let the CS know: The need for an annotation; if an annotation is included could the CS then remove it at the Spring meeting without it being a substantive change; and the alignment of all 3 Subcommittee proposals.

- **Other items**

The meeting was adjourned

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

January 5, 2016

Calcium Chloride (CBe): Discuss 2018 sunset questions

Ash from Manure Burning (CBe): Discuss petition

Calcium Chloride annotation change (CBe): Petition sufficiency, need for TR?

Discuss Contamination Issues in Farm Inputs (CBo/FT)

Squid and Squid Byproducts (CBe): Discuss TR if available

Copper sulfate (ZS): Discuss 2018 sunset questions

January 19, 2016. (CBe & ZS may miss call due to conflict with hydroponics task force).

Squid and Squid Byproducts (CBe): Discuss TR if available

Calcium Chloride annotation change (CBe): Petition sufficiency, need for TR.

Soy Wax (FT): Discuss proposal

Peracetic Acid (HA): Discuss 2018 sunset questions & TR if available

Hypochlorous Acid (HA) - discuss proposal

February 2, 2016

Peracetic Acid (HA) - Discuss 2018 sunset questions & TR if available

Hypochlorous Acid (HA) - Discuss proposal and vote

EPA List 3 - Inerts of Unknown Toxicity (ZS) - Discuss 2018 sunset questions & TR if available

Biodegradable Biobased Mulch (ZS) - Review public comment/memo/original

Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.

Squid and Squid Byproducts (CBe) - TR sufficiency

1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR.

February 16, 2016
 March 1, 2016
 March 15, 2016
 Contamination Issues in farm inputs
 April 5, 2016
 April 19, 2016
 May 3, 2016
 May 17, 2016
 June 7, 2016
 June 21, 2016
 July 5, 2016
 July 19, 2016
 August 2, 2016
 August 16, 2016
 September 6, 2016
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 October 4, 2016
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 November 1, 2016
 November 15, 2016
 December 6, 2016
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Spring 2016 Milestones	Target date
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NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday February 2, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Harold Austin (HA); Carmela Beck (CBe); (CBo); Harriet Behar (HB); Jesse Buie (JB); Emily Oakley (EO); Jean Richardson (JR) - sitting in; Scott Rice (SR) - sitting in; Tracy Favre (TF) - sitting in

Absent: none

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

Work Agenda

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Summary: Spr 2016 Review: Fall 2016					
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Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	Y	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015	Jan 19, Feb 2	Spr 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015. TR request on hold.	Feb 2	Spr 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016

Petitioned Substances					
Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting
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Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015), TR sent to CS 01 13 16. TR suff due 03 14 16	Feb 16	TBD
Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Waiting for LS to review	Proposal Spr 2016
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Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1, Jan 19	Spr 2016
Calcium Chloride annotation change 205.602	CBe		Petition sent to CS 11 02 15. Petition suff/ TR Request due 01 04 16	Feb 16	TBD
1-methylcyclopropene (1-MCP). 205.601	ZS/HA		Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16	Feb 16	TBD
Fatty Alcohols (octanol/decanol mix)	?		Petition sent to CS 01 27 16. Petition suff/TR Request due 03 28 16		TBD

Inert Ingredients

Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016

Other Topics

Project	Contact	Doc type	Notes*	Disc/Vote	Meeting
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Contamination Issues in Farm Inputs	FT/HB		Report?	Mar 15	TBD
Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	ZS	DD?		Feb 2, Feb 23	TBD
Prohibition of NPEs in Inerts annotation change	ZS	DD	DD leading toward annotation change. NOP already approved work agenda item	Feb 2	Spr 2016
Marine materials (marine algae and extracts)	JR	DD	Pending NOP approval. NOP approved request 1-12-16 TR request sent to NOP Feb 5	Feb 2	
Newspaper - annotation change	ZS				TBD
Research Priorities	All	NA	RPs due to MS Aug 2016		Fall 2016

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Agenda

- Approve Crops Subcommittee notes of January 19
- Welcome to our new members, brief introductions
- Discuss potential April 19 webinar/Subcommittee meeting rescheduling
- Sunset 2018 first postings
 - Peracetic Acid (HA) - Discuss 2018 sunset questions & TR if available
 - EPA List 3 - Inerts of Unknown Toxicity (ZS) - attached
- Hypochlorous Acid (HA) - Discuss proposal and vote
- Nonyl Phenol Ethoxylates (NPEs). Discussion document for spring meeting.
- Biodegradable Biobased Mulch (ZS) - Review history and proposal, vote will be Feb.23.
- Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.
- Squid and Squid Byproducts (CBe) - TR sufficiency
- 1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR (no document, just discussion)
- Update from Livestock subcommittee on status of Aluminum sulfate petition
- Marine Algae TR questions
- Other items
- Adjourn

Discussion

- **Crops Subcommittee notes of January 19** were approved with a minor clarification to the language under the discussion of soy wax. Regarding the availability of non-GMO soy wax. HB will research availability further.

- **Introductions and welcome to new members.**
- **Discuss potential April 19 webinar/Subcommittee meeting rescheduling.** The group decided the best approach would be to leave the conference calls on Tuesday, April 19 and to hold the public comment webinar on either Monday or Wednesday, April 18 or 20. The NOP will schedule the webinar accordingly.
- **Marine algae and Marine materials (marine algae and extracts).** The lead author indicated that there are nine materials on the National List that fall into this category. The Subcommittee is seeking clarification on the substances, and will include specific questions in the TR request. The HS will also focus on the broader areas of conservation and sustainability. The lead asked that members send comment to her and the HS chair by Friday, February 3.
- **Sunset 2018 first postings**
 - **Peracetic Acid (HA).** The lead summarized the review, and based on the conversation in Subcommittee, will make suggested edits and recirculate the document.
 - **EPA List 3 - Inerts of Unknown Toxicity (ZS).** The lead author presented the draft document for the members and discussed several specific materials on the list, including pheromones. The CS Chair asked that the NOP add the citation for the Oct 2015 recommendation.
- **Hypochlorous Acid (HA).** Hypochlorous acid is a petitioned material also being reviewed by the LS and HS, and the lead authors have worked together to align the proposals. The lead summarized the manufacture and use of the material and noted that the end product is found to be safer than some alternatives, and there are no by-products. The group discussed the possible inclusion of language regarding pH but after some discussion decided that it was not necessary. They also discussed an annotation regarding the on-site manufacture of hypochlorous acid, which the lead will revise and add. The CS held the vote to classify hypochlorous acid and will defer the motion to add until the next call.

Motion to classify hypochlorous acid as petitioned as synthetic

Motion by: HA

Seconded by: FT

Additional discussion: none

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

- **Nonyl Phenol Ethoxylates (NPEs).** The lead summarized the history and previous review of these substances and discussed information from the TR regarding safety, for the benefit of the new members. The NOSB is collaborating with the EPA Safer Choice Program (SCP) on the List 4 Inerts and will proceed with a discussion document, and eventually a proposal, to remove NPE's from organic products. The CS is putting forth the discussion document to allow manufacturers enough time to reformulate.

Motion to accept the discussion document on NPEs

Motion by: ZS

Seconded by: HA

Additional discussion: The NOP suggested adding Chemical Abstracts Service (CAS) numbers. A member asked for some clarifying language for ease of reading.

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

- **Biodegradable Biobased Mulch (ZS).** The lead author summarized the history of the petition, the subsequent NOSB proposal, and the NOP response to the NOSB recommendation. The NOP response memo (issued in January 2015) effectively rules out any products currently on the market from being used because no products qualify due to insufficient bio-based content. The group discussed several options for moving forward. The lead asked the members to review the documents so they can vote on the February 23 call.

The remainder of the agenda items were deferred to the next call in the interest of time.

- Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.
- Squid and Squid Byproducts (CBe) - TR sufficiency
- 1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR (no document, just discussion)
- Update from Livestock Subcommittee on status of aluminum sulfate petition
- Other items
- The meeting was adjourned

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

January 19, 2016. (CBe & ZS may miss call due to conflict with hydroponics task force).

Squid and Squid Byproducts (CBe): Discuss TR if available

Calcium Chloride annotation change (CBe): Petition sufficiency, need for TR.

Soy Wax (FT): Discuss proposal

Peracetic Acid (HA): Discuss 2018 sunset questions & TR if available

Hypochlorous Acid (HA) - discuss proposal

February 2, 2016

Peracetic Acid (HA) - Discuss 2018 sunset questions & TR if available

Hypochlorous Acid (HA) - Discuss proposal and vote

EPA List 3 - Inerts of Unknown Toxicity (ZS) - Discuss 2018 sunset questions & TR if available

Biodegradable Biobased Mulch (ZS) - Review public comment/memo/original

Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.

Squid and Squid Byproducts (CBe) - TR sufficiency

1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR.

February 16, 2016

Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.

Squid and Squid Byproducts (CBe) - TR sufficiency

1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR (no document, just discussion)

Update from Livestock Subcommittee on status of aluminum sulfate petition

March 1, 2016

March 15, 2016

Contamination Issues in farm inputs

April 5, 2016

April 19, 2016

May 3, 2016

May 17, 2016

June 7, 2016

June 21, 2016

July 5, 2016

July 19, 2016

August 2, 2016

August 16, 2016

September 6, 2016

September 20, 2016

October 4, 2016

October 18, 2016

November 1, 2016
November 15, 2016
December 6, 2016
December 20, 2016

Spring 2016 Milestones	Target date
New NOSB member orientation	Feb 29, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
NOSB - Spring 2016 proposals due to NOP	Feb 26, 2016
NOP - Post proposals, Publish FRN, Open public comment	Mar 8, 2016
Discuss work agendas on ES call	Mar 11, 2016
Public comment webinars	??
Public comment closes	Apr 6, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
NOP - Send compiled public comments to NOSB	Apr 11, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016

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 16, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Harold Austin (HA); Carmela Beck (CBe); (CBo); Harriet Behar (HB); Jesse Buie (JB); Emily Oakley (EO); Jean Richardson (JR) - sitting in; Tracy Favre (TF) - sitting in

Absent: none

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

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Discussed/ Reviewed	Meeting
Copper sulfate 205.601(a) 205.601(e)	ZS	2015 LS TR	Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016
Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	Y	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015	Jan 19, Feb 2	Spr 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015. TR request on hold.	Feb 2	Spr 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016

Petitioned Substances

Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting
Ash from Manure Burning 205.602(a)	CBe		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. To be revisited after fall 2015.	Jan 5	Spr 2016
Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015), TR sent to CS 01 13 16. TR suff due 03 14 16. TR found sufficient 02 16 16	Feb 16, Mar 1	Spr 2016
Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Waiting for LS review	Fall 2016
Hypochlorous Acid 205.605, 205.603, and 205.601	HA	2015	NOP Policy Memo 14-3: Electrolyzed Water (PDF) Petition sent to HS 06 03 15. Response/request for TR due 08 03 15. TR request sent to NOP 07 21 15. TR sent to HS 08 13 15. TR suff due 10 13 15. TR suff discussion scheduled for 12 01 15 in HS	Jan 19, Feb 2. Feb 16	Spr 2016
Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1, Jan 19	Spr 2016
Calcium Chloride annotation change 205.602	CBe	N	Petition sent to CS 11 02 15. Petition suff/TR Request due 01 04 16. CS rejected petition based on the lack of new substantive info.	Feb 16	NA
1-methylcyclopropene (1-MCP). 205.601	ZS/HA		Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16	Feb 16, Mar 1	Fall 2016
Fatty Alcohols (octanol/decanol mix)	JB		Petition sent to CS 01 27 16. Petition suff/TR Request due 03 28 16	Mar 1	Fall 2016

Inert Ingredients

Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	Contact	Doc type	Notes*	Disc/Vote	Meeting
Contamination Issues in Farm Inputs	FT/HB		Report?	Mar 15	TBD
Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23	Fall 2016
Prohibition of NPEs in Inerts annotation change	ZS	DD	DD leading toward annotation change. NOP already approved work agenda item	Feb 2	Spr 2016
Marine materials (marine algae and extracts)	JR	DD	Pending NOP approval. NOP approved request 1-12-16 TR request sent to NOP Feb 5	Feb 2	
Newspaper - annotation change	ZS				TBD
Research Priorities	All	NA	RPs due to MS Aug 2016		Fall 2016

* **Yellow highlight** indicates Subcommittee action needed ***Highlight** indicates review completion

Agenda

- Approve Crops Subcommittee notes of February 2
- Hypochlorous acid (HA)
- Squid and Squid Byproducts (CBe) - TR sufficiency review
- Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR, completion date?
- Biodegradable biobased mulch (ZS) timeline for completion
- 1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR
- Aluminum sulfate petition update
- New Petition: Fatty Alcohols (octanol and decanol).
- Upcoming work agenda items
- Adjourn

Discussion

- **Crops Subcommittee notes of February 2** were approved with no changes
- **Hypochlorous acid (HA)**. The lead reviewed the proposal and noted that the HS removed the annotation from its proposal and re-voted. The CS will do the same so that all three proposals (HS, CS and LS) are aligned. The CS moved to a vote:

Motion to add **Hypochlorous acid** as petitioned at §205.601(c)(a) (2)chlorine materials.....(iv)

Motion by: HA

Seconded by: EO

Additional discussion: none

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

- **Squid and squid byproducts (CBe)**. The TR was found sufficient. The lead summarized the material and its uses from the info in the petition and TR. The Crops subcommittee will proceed to a proposal for full Board consideration at the fall 2016 meeting.
- **Calcium chloride annotation change (CBe)**. The lead reviewer summarized the uses of calcium chloride. The petitioner is requesting removal of the annotation limiting use as a foliar spray for certain disorders. The CS compared the current petition to the previous petition for calcium chloride, and finds no new substantive information, therefore the Subcommittee is rejecting this proposal, and will not proceed with a review.
- **Biodegradable biobased mulch (ZS)**. The lead feels that in order to have the new members participate fully in this conversation, it would be best to defer this discussion and proposal until the fall 2016 meeting. HB will be the lead author. Members discussed the history of the proposal and subsequent NOP memo.
- **New Petition: Fatty Alcohols (octanol and decanol)**. JB volunteered to be the lead reviewer for this material. The first step is to determine petition sufficiency, and then decide whether or not to request a TR before moving to the proposal stage. Petition sufficiency and a request for a TR are due March 28.
- **1-methylcyclopropene (1-MCP) (ZS/HA)**. The CS Chair gave an overview of this substance, which is used to keep apples fresher in storage, and delays ripening after harvest. 1-MCP is synthetic and although the petition included confidential business information (CBI) the petitioners included the patent information.. The patent includes various manufacturing processes, all of which are clearly synthetic. The co-lead author noted that this material is used extensively in conventional apple storage, and that it does prevent rot/waste and extends the availability of stored fruit. The group discussed the appropriate section on the National List for this material, since it is a post-harvest use. The lead noted the lack of appropriate category of allowed synthetics in OFPA for this substance, a plant growth regulator. The members also discussed alpha-cyclodextrin, an additional substance mentioned in the petition and will discuss this further on the next call.
- **Aluminum sulfate - Update from Livestock Subcommittee**. Aluminum Sulfate will be on the agenda for the fall 2016 meeting, and the LS is awaiting a TR for litter amendments.
- **Upcoming work agenda items**. The CS Chair asked that members submit ideas for new work agenda items so they can discuss them during the March 1 call so they can be discussed on the March 11 Exec call.
- **Other items** - none
- **The meeting was adjourned**

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

February 2, 2016

Peracetic Acid (HA) - Discuss 2018 sunset questions & TR if available

Hypochlorous Acid (HA) - Discuss proposal and vote

EPA List 3 - Inerts of Unknown Toxicity (ZS) - Discuss 2018 sunset questions & TR if available
 Biodegradable Biobased Mulch (ZS) - Review public comment/memo/original
 Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.
 Squid and Squid Byproducts (CBe) - TR sufficiency
 1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR.

February 16, 2016

Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.
 Squid and Squid Byproducts (CBe) - TR sufficiency
 1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR
 Update from Livestock Subcommittee on status of aluminum sulfate petition

March 1, 2016

Discuss potential work agenda items
 1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR
 Squid and Squid Byproducts (CBe)
 Fatty Alcohols (octanol/decanol mix) - Petition sufficiency

March 15, 2016

Contamination Issues in farm inputs

April 5, 2016

April 19, 2016

May 3, 2016

May 17, 2016

June 7, 2016

June 21, 2016

July 5, 2016

July 19, 2016

August 2, 2016

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September 6, 2016

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October 4, 2016

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December 6, 2016

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Spring 2016 Milestones	Target date
New NOSB member orientation	Feb 29, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
NOSB - Spring 2016 proposals due to NOP	Feb 26, 2016
NOP - Post proposals, Publish FRN, Open public comment	Mar 8, 2016
Discuss work agendas on ES call	Mar 11, 2016
Public comment closes	Apr 6, 2016
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Spring 2016 NOSB meeting – Washington, DC

Apr 25 - 27, 2016

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 1, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Carmela Beck (CBe); (CBo); Jean Richardson (JR) - sitting in;

Absent: Harriet Behar (HB); Jesse Buie (JB); Emily Oakley (EO); Harold Austin (HA)

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

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Discussed/ Reviewed	Meeting
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Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	Y	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015	Jan 19, Feb 2	Spr 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015. TR request on hold.	Feb 2	Spr 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016

Substances					
Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting
Ash from Manure Burning 205.602(a)	CBe		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. To be revisited after fall 2015.	Jan 5	Spr 2016

Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015), TR sent to CS 01 13 16. TR suff due 03 14 16. TR found sufficient 02 16 16	Feb 16, Mar 1	Spr 2016
Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Waiting for LS review	Fall 2016
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Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1, Jan 19	Spr 2016
Calcium Chloride annotation change 205.602	CBe	N	Petition sent to CS 11 02 15. Petition suff/TR Request due 01 04 16. CS rejected petition based on the lack of new substantive info.	Feb 16	NA
1-methylcyclopropene (1-MCP). 205.601	ZS/HA		Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16	Feb 16, Mar 15	Fall 2016
Fatty Alcohols (octanol/decanol mix)	JB		Petition sent to CS 01 27 16. Petition suff/TR Request due 03 28 16	Mar 15	Fall 2016
Inert Ingredients					
Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	Contact	Doc type	Notes*	Disc/Vote	Meeting

Contamination Issues in Farm Inputs	FT/HB		Report?	Mar 15	TBD
Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23	Fall 2016
Prohibition of NPES in Inerts annotation change	ZS	DD	DD leading toward annotation change. NOP already approved work agenda item	Feb 2	Spr 2016
Marine materials (marine algae and extracts)	JR	DD	Pending NOP approval. NOP approved request 1-12-16. TR request sent to NOP Feb 5	Feb 2	
Newspaper - annotation change	ZS				TBD
Research Priorities	All	NA	RPs due to MS Aug 2016		Fall 2016

* **Yellow highlight** indicates Subcommittee action needed ***Highlight** indicates review completion

Agenda

- Approve Crops Subcommittee notes of February 16
- Squid and Squid Byproducts (CBe). Discuss proposal/vote
- Discuss potential work agenda items
- 1-methylcyclopropene (1-MCP) (ZS/HA). Petition sufficiency, need for TR
- Fatty Alcohols (octanol/decanol mix). Petition sufficiency
- Adjourn

Discussion

- **Approval of Crops Subcommittee notes** of February 16 were deferred to next call due to lack of quorum.
- **Squid and Squid Byproducts (CBe)**. The lead summarized the petition and the uses for this material. Members discussed the proposal via email prior to the call as well as during the call. One member had questions about whether or not squid required a separate listing or could be added to the current listing for liquid fish products. NOP suggested proposing it as a stand-alone item, then NOP will determine the best regulatory placement. A member expressed concerns about overfishing, although the TR indicates that this material is a byproduct and therefore its addition will not incentivize overfishing. The members discussed the fact that the FDA definition lists squid as a "fish product" although squid are actually mollusks. For clarity, the Subcommittee feels squid should be identified separately. The CS opened the vote, and will hold it open until close-of-business Wednesday for email voting by absent members. **ABS Note:** the vote below reflects the votes from the entire Subcommittee, tallied after email voting closed.

Motion to classify squid & squid byproducts as synthetic

Motion by: CBe

Seconded by: ZS

Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Motion to list squid & squid byproducts at §205.601(j) of the National List with the following annotation: 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.

Motion by: CBe

Seconded by: ZS

Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

- **Work agenda items.** The Crops Chair circulated a draft document suggesting a new work agenda topic: Strengthening the Organic Seed Guidance. The CS feels that the NOP guidance regarding commercial availability of organic seed issued in March 2013 needs strengthening. Crops would like to reevaluate the progress from the last 5 years, and will submit a request to the Executive Committee and then to the NOP to add it to its work agenda. The Chair will discuss this topic on the Executive call on March 11.
- **1-methylcyclopropene (1-MCP) (ZS/HA).** Deferred to next call
- **Fatty Alcohols (octanol/decanol mix).** Deferred to next call

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

February 16, 2016

Calcium Chloride annotation change (CBe) - Petition sufficiency, need for TR.

Squid and Squid Byproducts (CBe) - TR sufficiency

1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR

Update from Livestock Subcommittee on status of aluminum sulfate petition

March 1, 2016

Discuss potential work agenda items

1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR

Squid and Squid Byproducts (CBe)

Fatty Alcohols (octanol/decanol mix) - Petition sufficiency

March 15, 2016

Approve notes from February 16 and March 1

1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR

Fatty Alcohols (octanol/decanol mix) - Petition sufficiency

Contamination Issues in farm inputs

April 5, 2016

April 19, 2016

May 3, 2016

May 17, 2016

June 7, 2016

June 21, 2016

July 5, 2016

July 19, 2016

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September 6, 2016

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November 15, 2016
December 6, 2016
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Spring 2016 Milestones	Target date
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Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday March 15, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Carmela Beck (CBe); (CBo); Jesse Buie (JB); Emily Oakley (EO); Harold Austin (HA); Harriet Behar (HB); Tracy Favre (TF) - sitting in; Jean Richardson (JR) - sitting in

Absent: none

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

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Discussed/ Reviewed	Meeting
Copper sulfate 205.601(a) 205.601(e)	ZS	2015 LS TR	Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016
Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	2016	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015. TR sent to CS 03 04 16. Response due as soon as possible to facilitate posting before Spring 2016 meeting. TR found sufficient 03 15 16	Jan 19, Feb 2	Spr 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015. TR request on hold.	Feb 2	Spr 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016

Substances					
Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting
Ash from Manure Burning 205.602(a)	CBe		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. To be revisited after fall 2015.	Jan 5	Spr 2016

Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015), TR sent to CS 01 13 16. TR suff due 03 14 16. TR found sufficient 02 16 16	Feb 16, Mar 1	Spr 2016
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Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1, Jan 19	Spr 2016
Calcium Chloride annotation change 205.602	CBe	N	Petition sent to CS 11 02 15. Petition suff/TR Request due 01 04 16. CS rejected petition based on the lack of new substantive info.	Feb 16	NA
1-methylcyclopropene (1-MCP). 205.601	ZS/HA	N	Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16. CS rqstd additional info from petitioner 03 17 16. No new TR	Feb 16, Mar 15	Fall 2016
Fatty Alcohols (octanol/decanol mix)	JB	Y	Petition sent to CS 01 27 16. Petition suff/TR Request due 03 28 16. Petition found sufficient 03 17 16. TR request sent to NOP 03 17 16.	Mar 15	Fall 2016
Inert Ingredients					
Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
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Contamination Issues in Farm Inputs	FT/HB		Report?	Apr 5	TBD
Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23	Fall 2016
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Newspaper - annotation change	ZS				TBD
Research Priorities	All	NA	RPs due to MS Aug 2016		Fall 2016

* **Yellow highlight** indicates Subcommittee action needed ***Highlight** indicates review completion

Agenda

- Approve Crops Subcommittee notes of February 16 and March 1
- 1-methylcyclopropene (1-MCP) (ZS/HA). Petition sufficiency, need for TR
- Fatty Alcohols (octanol/decanol mix) (JB). Petition sufficiency
- Contamination Issues in farm inputs (FT/HB)
- Squid follow up
- Peracetic acid - TR sufficiency
- Adjourn

Discussion

- **Crops Subcommittee notes of February 16** were approved with no changes.
- **Crops Subcommittee notes of March 1** were approved with no changes.
- **1-methylcyclopropene (1-MCP) (ZS/HA)**. The CS discussed 1-MCP previously, and the lead summarized the material and its uses again for the group. 1-MCP is a plant growth regulator that works as an ethylene inhibitor. The petitioned use is post-harvest, where it prolongs storage and firmness. It is complexed with alpha cyclodextrin (claimed to be a natural sugar) for stabilization. The sugar is sourced from a fermentation process, however the patent indicates that it is synthetic but doesn't talk about the fermentation process. The group discussed asking the petitioner for additional information regarding classification, and the possibility of seeking a technical report (TR). The lead reviewer indicated that 1-MCP is a synthetic chemical and does not see a need for a TR, but the CS will seek further information and clarification from the petitioner regarding the fermentation process. The group also discussed the location on the National List for such a listing. One member note support of this material as it would benefit smaller growers.
- **Fatty Alcohols (octanol/decanol mix) (JB)**. Fatty alcohols are being petitioned for use as sucker control on organic crops. The CS found the petition sufficient and the CS Chair suggested a TR request since this

is a new material. The group discussed the idea of reviewing the two materials (1-octanol and 1-decanol) separately since it is a blend, although the EPA considers the blend, and not the individual materials, an active pesticide ingredient. The CS Chair will compile a list of questions for the TR including a request for information about each of the individual materials.

- **Contamination Issues in farm inputs (FT/HB).** Deferred to April 5
- **Squid & Squid byproducts proposal.** The Chair asked for any follow-up questions or conversation, since some members missed the last meeting. One member asked for clarification whether squid can be considered a fish product (since an FDA definition includes molluscs as fish products) NOP clarified that the FDA definition as human food is not relevant for fertilizer use, and advised it will be better to specifically clarify whether stabilized squid products can be allowed as fertilizer.
- **Peracetic acid.** The TR was found sufficient and the Chair will notify the NOP of this determination.
- The meeting was adjourned

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

March 1, 2016

- Discuss potential work agenda items
- 1-methylcyclopropene (1-MCP) (ZS/HA) - Petition sufficiency, need for TR
- Squid and Squid Byproducts (CBe)
- Fatty Alcohols (octanol/decanol mix) - Petition sufficiency

March 15, 2016

- 1-methylcyclopropene (1-MCP) (ZS/HA).
- Fatty Alcohols (octanol/decanol mix).
- Contamination Issues in farm inputs

April 5, 2016

- Contamination Issues in farm inputs (FT/HB)

April 18, 2016

- Review comments

May 3, 2016 - cancelled

May 17, 2016

June 7, 2016

June 21, 2016

July 5, 2016

July 19, 2016

August 2, 2016

August 16, 2016

September 6, 2016

September 20, 2016

October 4, 2016

October 18, 2016

November 1, 2016

November 15, 2016

December 6, 2016

December 20, 2016

Spring 2016 Milestones	Target date
New NOSB member orientation	Feb 29, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016

NOSB - Spring 2016 proposals due to NOP	Feb 26, 2016
NOP - Post proposals, Publish FRN, Open public comment	Mar 16, 2016
Discuss work agendas on ES call	Mar 11, 2016
Public comment closes	Apr 14, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
NOP - Send compiled public comments to NOSB	Apr 11, 2016
Public comment webinars	Apr 19, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016

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 5, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Carmela Beck (CBe); (CBo); Emily Oakley (EO); Harold Austin (HA); Tracy Favre (TF) - sitting in; Jean Richardson (JR) - sitting in; Harriet Behar - sitting in
Absent: Jesse Buie (JB)
Staff: Michelle Arsenault (MA), Emily Brown Rosen (EBR)

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Discussed/ Reviewed	Meeting
Copper sulfate 205.601(a) 205.601(e)	ZS	2015 LS TR	Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016
Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	2016	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015. TR sent to CS 03 04 16. Response due as soon as possible to facilitate posting before Spring 2016 meeting. TR found sufficient 03 15 16	Jan 19, Feb 2	Spr 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015. TR request on hold.	Feb 2	Spr 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016

Petitioned Substances					
Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting
Ash from Manure Burning 205.602(a)	CBe		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. To be revisited after fall 2015.	Jan 5	Spr 2016

Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015), TR sent to CS 01 13 16. TR suff due 03 14 16. TR found sufficient 02 16 16	Feb 16, Mar 1	Spr 2016
Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Waiting for LS review	Fall 2016
Hypochlorous Acid 205.605, 205.603, and 205.601	HA	2015	NOP Policy Memo 14-3: Electrolyzed Water (PDF) Petition sent to HS 06 03 15. Response/request for TR due 08 03 15. TR request sent to NOP 07 21 15. TR sent to HS 08 13 15. TR suff due 10 13 15. TR suff discussion scheduled for 12 01 15 in HS	Jan 19, Feb 2. Feb 16	Spr 2016
Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1, Jan 19	Spr 2016
Calcium Chloride annotation change 205.602	CBe	N	Petition sent to CS 11 02 15. Petition suff/TR Request due 01 04 16. CS rejected petition based on the lack of new substantive info.	Feb 16	NA
1-methylcyclopropene (1-MCP) . + addendum 205.601	ZS/HA	N	Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16. CS rqstd additional info from petitioner 03 17 16. No new TR. Additional info from petitioner sent 03 23 16. Suff due ASAP	Feb 16, Mar 15	Fall 2016
Fatty Alcohols (octanol/decanol mix)	JB	Y	Petition sent to CS 01 27 16. Petition suff/TR Request due 03 28 16. Petition found sufficient 03 17 16. TR request sent to NOP 03 17 16.	Mar 15	Fall 2016
Ammonium Glycinate 205.601	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. 2007 crops technical report for amino acids		TBD
Ammonium Citrate 205.601	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. HS TR, Citric acid and salts, 2015		TBD

Inert Ingredients					
Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	Contact	Doc type	Notes*	Disc/Vote	Meeting
Contamination Issues in Farm Inputs	FT/HB		Report?	Apr 5	TBD
Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23	Fall 2016
Prohibition of NPEs in Inerts annotation change	ZS	DD	DD leading toward annotation change. NOP already approved work agenda item	Feb 2	Spr 2016
Marine materials (marine algae and extracts)	JR	DD	Pending NOP approval. NOP approved request 1-12-16 TR request sent to NOP Feb 5	Feb 2	TBD
Newspaper - annotation change	ZS		NOP approved request 01 12 16		TBD?
Research Priorities	All	NA	RP's due to MS Aug 2016		Fall 2016

* **Yellow highlight** indicates Subcommittee action needed ***Highlight** indicates review completion

Agenda

- Approve Crops Subcommittee notes of March 15
- Assign lead for two new petitioned substances: Ammonium citrate and Ammonium glycinate
- Update on 1-MCP new information from petitioner
- Contamination Issues in farm inputs (FT/HB)
- Adjourn

Discussion

- **Crops Subcommittee notes of March 15** were approved with no changes.
- **Two new petitioned substances: Ammonium citrate and Ammonium glycinate** were submitted by the same petitioner. A member noted that the wording in both was nearly identically except for the chemical name. Emily Oakley offered to take the lead for these reviews. The group will determine

petition sufficiency and need for a TR on the May 17 call. The CS Chair clarified for the new members how to determine the need for a TR.

- **1-MCP (ZS/HA).** The CS received the additional information it requested from the petitioner regarding the fermentation process. The CS feels a TR is not necessary. The lead will write the proposal using the new materials' review template form, and the Subcommittee will discuss it on May 17.
- **Contamination Issues in farm inputs (FT/HB).** The Co-leads summarized the draft document they circulated to the CS to review. The group discussed various components of the review such as categories, thresholds, testing and water/flooding. The members agreed that topics related to water and irrigation should be a separate work agenda item. The Crops Chair made some suggestions for next steps and asked that the leads develop some ideas for a workplan to be included in the document for discussion after the spring meeting.
- **Other items** - none
- The meeting was adjourned.

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

March 15, 2016

1-methylcyclopropene (1-MCP) (ZS/HA).
Fatty Alcohols (octanol/decanol mix).
Contamination Issues in farm inputs

April 5, 2016

Contamination Issues in farm inputs (FT/HB)

April 18, 2016

Review comments and presentations for spring NOSB meeting.

May 3, 2016 - cancelled

May 17, 2016

Ammonium citrate and Ammonium glycinate. Petition suff/need for TR
1-MCP (ZS/HA). Discuss proposal

June 7, 2016

June 21, 2016

July 5, 2016

July 19, 2016

August 2, 2016

August 16, 2016

September 6, 2016

September 20, 2016

October 4, 2016

October 18, 2016

November 1, 2016

November 15, 2016

December 6, 2016

December 20, 2016

Spring 2016 Milestones	Target date
New NOSB member orientation	Feb 29, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
NOSB - Spring 2016 proposals due to NOP	Feb 26, 2016
NOP - Post proposals, Publish FRN, Open public comment	Mar 16, 2016

Discuss work agendas on ES call	Mar 11, 2016
Public comment closes	Apr 14, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
NOP - Send compiled public comments to NOSB	Apr 18, 2016
Public comment webinars	Apr 19, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016

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 18, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Emily Oakley (EO); Harold Austin (HA); Jesse Buie (JB); Carmela Beck (CBe); Harriet Behar (HB); Tracy Favre (TF) - sitting in; Jean Richardson (JR) - sitting in; Tom Chapman (TC) - sitting in

Absent: Emily Brown Rosen (EBR)

Staff: Michelle Arsenault (MA), Devon Pattillo (DP)

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Discussed/ Reviewed	Meeting
Copper sulfate 205.601(a) 205.601(e)	ZS	2015 LS TR	Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016
Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Dec 15	Spr 2016
Peracetic acid 205.601(a) 205.601(i)	HA	2016	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015. TR sent to CS 03 04 16. Response due as soon as possible to facilitate posting before Spring 2016 meeting. TR found sufficient 03 15 16	Jan 19, Feb 2	Spr 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015. TR request on hold.	Feb 2	Spr 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jan 5	Spr 2016

Petitioned Substances					
Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting
Ash from Manure Burning 205.602(a)	CBe		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. To be revisited after fall 2015.	Jan 5	Spr 2016

Squid and Squid Byproducts 205.601 Petition amendment #1	CBe	Y	Petition sent to CS 05 12 15. Questions or request for TR due 07 14 15. HS requested TR 07 21 15. Petition amendment sent to CS 10 05 15. TR in development (expected Dec 2015), TR sent to CS 01 13 16. TR suff due 03 14 16. TR found sufficient 02 16 16	Feb 16, Mar 1	Spr 2016
Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Waiting for LS review	Fall 2016
Hypochlorous Acid 205.605, 205.603, and 205.601	HA	2015	NOP Policy Memo 14-3: Electrolyzed Water (PDF) Petition sent to HS 06 03 15. Response/request for TR due 08 03 15. TR request sent to NOP 07 21 15. TR sent to HS 08 13 15. TR suff due 10 13 15. TR suff discussion scheduled for 12 01 15 in HS	Jan 19, Feb 2. Feb 16	Spr 2016
Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested	Dec 1, Jan 19	Spr 2016
Calcium Chloride annotation change 205.602	CBe	N	Petition sent to CS 11 02 15. Petition suff/TR Request due 01 04 16. CS rejected petition based on the lack of new substantive info.	Feb 16	NA
1-methylcyclopropene (1-MCP) . + addendum 205.601	ZS/HA	N	Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16. CS rqstd additional info from petitioner 03 17 16. No new TR. Additional info from petitioner sent 03 23 16. Suff due ASAP	Feb 16, Mar 15	Fall 2016
Fatty Alcohols (octanol/decanol mix)	JB	Y	Petition sent to CS 01 27 16. Petition suff/TR Request due 03 28 16. Petition found sufficient 03 17 16. TR request sent to NOP 03 17 16.	Mar 15	Fall 2016
Ammonium Glycinate 205.601	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. 2007 crops technical report for amino acids		TBD
Ammonium Citrate 205.601	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. HS TR, Citric acid and salts, 2015		TBD

Inert Ingredients					
Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	Contact	Doc type	Notes*	Disc/Vote	Meeting
Contamination Issues in Farm Inputs	FT/HB		Report?	Apr 5	TBD
Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics"		TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23	Fall 2016
Prohibition of NPEs in Inerts annotation change	ZS	DD	DD leading toward annotation change. NOP already approved work agenda item	Feb 2	Spr 2016
Marine materials (marine algae and extracts)	JR	DD	Pending NOP approval. NOP approved request 1-12-16 TR request sent to NOP Feb 5	Feb 2	TBD
Newspaper - annotation change	ZS		NOP approved request 01 12 16		TBD?
Research Priorities	All	NA	RPs due to MS Aug 2016		Fall 2016

* **Yellow highlight** indicates Subcommittee action needed ***Highlight** indicates review completion

Agenda

- Approve Crops Subcommittee notes of April 5
- Review Public Comment & discuss presentations
- Preliminary discussion of research priorities.
- Adjourn

Discussion

- **Crops Subcommittee notes of April 5** approved with no changes.
- **Public comment**
 - **Peracetic Acid (2018 sunset):** The NOP clarified some information regarding uses of peracetic acid. The TR included information about FDA approved sanitizing solutions, a number of which contain peracetic acid and other chemicals. This does not impact the NOSB review, as they are reviewing peracetic as a single substance, and there is no restriction on manufacture or source.

- **Hypochlorous acid:** Commenters have raised concerns about sources, although the Board focus is on electrolyzed water. The NOP supports the addition of “as petitioned” to the proposal to clarify. The CS discussed adding the phrase “hypochlorous acid from electrolyzed water as petitioned.” The NOSB will discuss this at the meeting prior to voting. A member noted that according to Robert’s Rules the motion should be made, then amended, then voted upon.
- **Petitioned Items:**
 - **Squid and squid byproducts.** A few commenters noted the language about squid byproducts, as opposed to squid and squid byproducts. The lead suggested changing the motion to remove the word squid and leave in only squid byproducts.
 - **Copper sulfate for rice.** The petition was specifically for copper for rice. The NOSB received some comments from rice growers, but not much information regarding alternatives. Some comments discussed copper sulfate for other uses, which is not relevant to this review.
 - **Nutrient Vitamins and Minerals (NVM).** The Lead reached out to stakeholders to let them know that the Board is discussing the implementation timeline, and the CS will clarify the timeline at the NOSB meeting.
 - **Soy wax.** The CS received two comments - both in support of listing soy wax.
- **Research priorities (RPs).** The group had a brief discussion, and the CS Chair suggested that members keep the Research Priorities in mind during the NOSB meeting to potentially identify future work agenda topics. The CS will review the previous lists to determine which ones are completed and/or still relevant. The new priorities will be summarized and shortened so the funding agencies find it more useful.
- **Other items.**
 - **Biodegradable Biobased mulch.** The lead asked for some additional information about next steps for this topic. The CS Chair suggested reviewing the memo that NOP sent to Crops outlining three options for going forward. Members will discuss this further after the spring meeting.
- The meeting was adjourned.

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

April 5, 2016

Contamination Issues in farm inputs (FT/HB)

April 18, 2016

Review comments and presentations for spring NOSB meeting.

May 3, 2016 - cancelled

May 17, 2016

Ammonium citrate and Ammonium glycinate. Petition suff/need for TR 1-MCP (ZS/HA). Discuss proposal

June 7, 2016

Research Priorities

June 21, 2016

July 5, 2016

July 19, 2016

August 2, 2016

August 16, 2016

September 6, 2016

September 20, 2016

October 4, 2016

October 18, 2016

November 1, 2016

November 15, 2016

December 6, 2016
December 20, 2016

Spring 2016 Milestones	Target date
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Public comment webinars	Apr 19, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday May 17, 2016 2:00 pm ET**

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Emily Oakley (EO); Harold Austin (HA); Jesse Buie (JB); Carmela Beck (CBe); Harriet Behar (HB); Scott Rice (SR) - observer: Tracy Favre (TF) - observer

Absent: none

Staff: Michelle Arsenault (MA), Emily Brown Rosen (EBR); Devon Pattillo (DP)

Work Agenda

2018 Sunsets (TR requests)					
Summary: Spr 2016 Review: Fall 2016					
Substance	Contact	TR request?	Notes	Scheduled, Discussed, Voted	Meeting
Copper sulfate 205.601(a) 205.601(e)	ZS	2015 LS TR	Sunset date: 11/3/2018. No new TR requested.	Jun 7	Fall 2016
Ozone gas 205.601(a)	FT	N	Sunset date: 11/3/2018. No new TR requested.	Jun 21	Fall 2016
Peracetic acid 205.601(a) 205.601(i)	HA	2016	Sunset date: 5/29/2018. HS requested TR 07 21 15. TR in development as of Nov 2015. TR sent to CS 03 04 16. Response due as soon as possible to facilitate posting before Spring 2016 meeting. TR found sufficient 03 15 16	Jun 21	Fall 2016
EPA List 3 - Inerts of Unknown Toxicity 205.601(m)	ZS	Y	Sunset date: 11/3/2018. HS requested TR 07 10 15. Request for TR under review as of Nov 2015. TR request on hold.	Jun 7	Fall 2016
Calcium chloride 205.602(c)	CBe	N	Petition for annotation change. Sunset date: 11/3/2018. No new TR requested.	Jun 21	Fall 2016

Petitioned Substances					
Substance	Contact	TR request?	Notes	Discussed, Voted	Meeting

Aluminum sulfate	JR	Y	The petitioner requests two related allowances on the NL: (1) treatment of poultry litter (205.603) and (2) application of treated poultry litter to the field (205.601). Sent to LS 03 12 14. TR request sent to NOP 06 18 14. TR expected Jan 2015. TRs (2) sent to LS 05 15 15. Suff due 07 15 15. TR found insufficient 07 21 15. Waiting for LS	Jul 19	Fall 2016
Soy Wax	FT	N	Petition sent to CS 10 14 15. Questions or request for TR due 12 15 15. Petition found suff 12 01 15. No TR requested. Referred back to CS at Spr 2016 NOSB	Jun 21	Fall 2016
1-methylcyclopropene (1-MCP) . + addendum 205.601	ZS/HA	N	Petition sent to CS 11 30 15. Petition suff/TR Request due 02 01 16. CS rqstd additional info from petitioner 03 17 16. No new TR. Additional info from petitioner sent 03 23 16. Suff due ASAP	Feb 16, Mar 15, Jun 21	Fall 2016
Fatty Alcohols (octanol/decanol mix)	JB	Y	Petition sent to CS 01 27 16. Petition suff/TR Request due 03 28 16. Petition found sufficient 03 17 16. TR request sent to NOP 03 17 16.	TBD	TBD
Ammonium Glycinate 205.601	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. 2007 crops technical report for amino acids	May 17	TBD
Ammonium Citrate 205.601	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. HS TR, Citric acid and salts, 2015	May 17	TBD
Anaerobic Digestate 205.203	ZS		New petition sent to MS 04 22 16. Under review for eligibility at request of NOP	May 17, Jun 7, Jul 5	TBD
Inert Ingredients					
Substance	Contact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Fall 2016?
Other Topics					
Project	Contact	Doc type	Notes*	Disc/Vote	Meeting
Contamination Issues in Farm Inputs	FT/HB		Report?	Apr 5,	TBD

Anaerobic Digestate - Food Waste 205.601(j) and other manure issues	ZS		Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. Reqst for TR or White paper. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review.	TBD	TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23	Fall 2016
Prohibition of NPEs in Inerts annotation change	ZS	DD	on hold		TBD
Marine materials (marine algae and extracts)	JR	DD	NOP approved request 1-12-16 TR request sent to NOP Feb 5.	Feb 2,	TBD
Newspaper - annotation change	ZS		NOP approved request 01 12 16		TBD?
Hydroponics	ZS		Report due from Task Force ~June. DD or proposal?		Fall 2016
Research Priorities	All	NA	RP's due to MS Aug 2016	Jun 7	Fall 2016

* **Yellow highlight** indicates Subcommittee action needed ***Highlight** indicates review completion

Agenda

- Approve Crops Subcommittee notes of April 18
- Ammonium citrate and ammonium glycinate (EO). Petition suff/need for TR
- Anaerobic Digestate (ZS) - Petition sufficiency
- Work agenda scheduling
- Adjourn

Discussion

- **Crops Subcommittee notes of April 18** approved with no changes
- **April 2016 meeting recap.** A member suggested that based on previous discussion and public comment, the NOSB should undertake a comprehensive review of sanitizers. The Crops Chair recommended delaying this project until the new sunset reorganization proposal is approved, so they can determine which materials will be reviewed when. Members also expressed support that the Handling Subcommittee take the lead for this project, since most of the sanitizers are listed under handling.
- **Ammonium citrate and ammonium glycinate (EO).** The lead noted that the two petitions are nearly identical, and both substances are being petitioned for use as chelating agents for fertilizers. The CS Chair asked if the petition included justification for why Ammonium citrate and Ammonium glycinate would be better/preferred over what is already on the list, such as lignin sulfonate. The lead noted that the petition did not include much information about why these are necessary. The group discussed whether or not to return the petition to the petitioner for justification, or whether to request a TR, and chose the former. The CS will include specific questions for the petitioner as to why the current chelating agents are not sufficient and will re-evaluate for sufficiency when it is returned.

- **Anaerobic digestate (ZS).** Anaerobic digestate was previously petitioned (and subsequently withdrawn) but the new petition presents a different process and is asking for removal of the waiting period for manure-based anaerobic digestate (90-120 days). Currently the petition is still under review for eligibility. Members discussed the lack of information in the petition regarding nutrient content and fate and will discuss this further. Additionally, at a future date, they will consider the NOP memo on treated manure that was recently issued. With regard to the current petition on anaerobic digestate, the lead offered to develop questions for the petitioner.
- **Work agenda scheduling.** The Crops Subcommittee scheduled discussion times for work agenda items (see table above) and added a call on August 30 in case more time is needed.
- **Biodegradable biobased mulch (HB).** The group discussed the history of the NOSB recommendation for biodegradable biobased mulch, and the subsequent memo issued by the NOP. The lead noted that the NOSB recommendation took into consideration the biobased content amount, and the NOSB was aware that the product would not be 100% bio-based. A Subcommittee member feels that this component of the recommendation was misinterpreted by the NOP. A new NOSB member will be addressing this work agenda item, and was urged to review the background document that was circulated several months ago that included three options for moving forward.
- **Prohibition of NPEs in inerts annotation change.** The proposed rule implementing the NOSB 2015 recommendation on inerts is likely to be released in 2017, and since her term is ending in January 2017, the lead would like to transition this project to another NOSB member. Additionally, she asked for volunteers for the inerts working group to aid in transition at the end of both current members' term. JB volunteered.
- **Hydroponics Task Force report.** The NOP indicated that the Task Force may complete its report to the Crops Subcommittee by mid-to-late June. Once Crops receives the report, the lead will develop a proposal. Going forth, the group will discuss options and conduct a straw poll to get a sense of the Subcommittee.
- The CS added an extra call on August 30
- The meeting was adjourned.

[Previous CS Notes](#)

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

April 18, 2016

Review comments and presentations for spring NOSB meeting.

May 3, 2016 - cancelled

May 17, 2016

Ammonium citrate and Ammonium glycinate (EO). Petition suff/need for TR 1-MCP (ZS/HA). Discuss proposal

June 7, 2016

Research Priorities (All)
Copper sulfate (ZS) - discuss and vote
EPA List 3 inerts (ZS) - discuss and vote
Anaerobic Digestate (ZS) - discuss

June 21, 2016

Ozone Gas (FT) - discuss and vote
Soy Wax (FT) - discuss and vote
Peracetic acid (HA) - discuss and vote
Calcium chloride (CBe) - discuss and vote
1-MCP (ZS/HA) - discuss and vote

July 5, 2016

Anaerobic Digestate (ZS) - discuss

July 19, 2016

Aluminum sulfate (JR)

Biodegradable Biobased Mulch (HB)

August 2, 2016

August 16, 2016

August 30, 2016 additional call

September 6, 2016

September 20, 2016

October 4, 2016

October 18, 2016

November 1, 2016

November 15, 2016

December 6, 2016

December 20, 2016

Fall 2016 Milestones	Target dates (tentative)
NOP - Complete fall 2016 NOSB meeting tentative agenda	Sept 8, 2016
NOSB - Fall 2016 proposals due to NOP	Sept 14, 2016
NOP - Post proposals, Publish FRN, Open public comment	June/TBD
Discuss work agendas on ES call	Oct 14, 2016
Public comment closes	Oct 26, 2016
NOP - Send compiled public comments to NOSB	Nov 2, 2016
Public comment webinars	Nov 3, 2016
Work agendas finalized on ES call (last call before fall meeting)	Nov 4, 2016
Fall 2016 NOSB meeting - St Louis, MO	Nov 16-18, 2016