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

Other Topics

Project	Con-tact	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

* 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
Tuesday January 19, 2016 2:00 pm ET

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Harold Austin (HA); Colehour Bondera (CBo); Harriet Behar (HB) - sitting in; Emily Oakley (EO) - sitting in; Scott Rice (SR) - sitting in; Tracy Favre (TF) - sitting in
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
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	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	Con-tact	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	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
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, Feb 2	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	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	Con-tact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016

Other Topics

Project	Con-tact	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

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

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 at 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 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
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
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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
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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

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

Petitioned Substances

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

Other Topics

Project	Con-tact	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	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

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

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 a**lso 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: 0 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

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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	**Con-tact**	**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	Con-tact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	**Con-tact**	**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?
- Biodegradeable 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 201 6 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
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 closes	Apr 6, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
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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
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

Substances

Substance	Con-tact	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	**Con-tact**	**TR rqstd?**	**Notes***	**Vote**	**Meeting**
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016
Other Topics					
Project	**Con-tact**	**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

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

Other Topics

Project	Con-tact	Doc type	Notes*	Disc/Vote	Meeting

Contamination Issues in Farm Inputs	FT/HB		Report?	Apr 5	TBD
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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	Con-tact	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	**Con-tact**	**TR rqstd?**	**Notes***	**Vote**	**Meeting**
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016

Other Topics					
Project	**Con-tact**	**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 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	Con-tact	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	**Con-tact**	**TR rqstd?**	**Notes***	**Vote**	**Meeting**
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Spr 2016

Other Topics					
Project	**Con-tact**	**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
New NOSB member orientation	Feb 29, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
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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 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	**Con-tact**	**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	**Con-tact**	**TR rqstd?**	**Notes***	**Vote**	**Meeting**
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Fall 2016?
Other Topics					
Project	**Con-tact**	**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 16requesting 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	RPs 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

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 7, 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) - observer; Lisa de Lima - observer; Tom Chapman (TC) - observer
Absent: none
Staff: Michelle Arsenault (MA), 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 21	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 a	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	**Con-tact**	**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, Jul 5	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 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. 2007 crops technical report for amino acids, Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16	May 17	TBD
Ammonium Citrate 205.601 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. HS TR, Citric acid and salts, 2015. Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16	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, Jul 5	TBD
Polyoxon D Zinc salt			Petition sent to CS 06 16 16. Petition suff/TR Request due 08 16 16.		TBD
Inert Ingredients					
Substance	**Con-tact**	**TR rqstd?**	**Notes***	**Vote**	**Meeting**
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Fall 2016?

Other Topics					
Project	**Con-tact**	**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 16requesting review.	TBD	TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23, Jul 19	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, Aug 2	TBD
Newspaper - annotation change	ZS		NOP approved request 01 12 16	Aug 2	TBD?
Hydroponics	ZS		Report due from Task Force ~June. DD or proposal?	Jul 19	Fall 2016
Research Priorities	All	NA	RPs due to MS Aug 2016	Jun 7	Fall 2016
Strengthen and clarify the requirements for use of organic seed (NOP 5029)	ZS/HB		Originated in MS. Draft DD in development	Aug 2	

2019 Sunsets (TR requests) Summary: Spr 2017 Review: Fall 2017					
Substance	**Contact**	**TR request?**	**Notes**	**Scheduled, Discussed, Voted**	**Meeting**
Calcium hypochlorite 205.601(a)	FT			Jun 21	Summary Spr 17

Chlorine dioxide 205.601(a)	FT			Jun 21	
Sodium hypochlorite 205.601(a)	FT			Jun 21	
Herbicides, soap-based 205.601(b)	EO			Jun 21	
Biodegradable biobased mulch film 205.601(b)	HB			Jun 21	
Boric acid 205.601(e)	HB			Jun 21	
Sticky traps/barriers 205.601(e)	EO			Jun 21	
Copper sulfate 205.601(i)	ZS			Jun 21	
Coppers, fixed 205.601(i)	ZS			Jun 21	
Humic acids 205.601(j)	CBe			Jun 21	
Soluble boron products 205.601(j)	ZS			Jun 21	
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	ZS			Jun 21	
Vitamin B1 205.601(j)	CBe			Jun 21	
Vitamin C 205.601(j)	CBe			Jun 21	
Vitamin E 205.601(j)	CBe			Jun 21	
Lead salts 205.602(d)	FT			Jun 21	
Tobacco dust (nicotine sulfate) 205.602(i)	HB			Jun 21	

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

Agenda

- Approve Crops Subcommittee notes of May 17
- Work agenda discussions and scheduling
- Research Priorities for Crops

- Assign sunset 2019 items to leads for determining TR requests
- List 3 inerts (ZS) - discuss and vote
- Adjourn

Discussion

- **Crops Subcommittee notes of May 17** were approved with a minor change under the biodegradable biobased mulch section.
- **Work agenda discussions and scheduling.**
    - **Hydroponics.** The group discussed the timeline and how to structure the subsequent proposal. The hydroponics task force has asked for an extension to submit the report and would like to submit it July 1. Members discussed how to go forth in light of the timeline and feel that if they get the report by July 1, they would have time to develop a proposal for the fall meeting. The group discussed the path forward.
    - **NOP Guidance on Seed and Planting Stock NOP 5029.** The goal of this project is to provide a recommendation to strengthen and clarify the requirements for use of organic seed when commercially available. The Crops Subcommittee will submit a request to Executive team for a guest speaker and would like to invite the Director of Advocacy & Communications at the Organic Seed Alliance to speak at the fall meeting.
- **Research Priorities.** The group discussed the items on the draft research priorities document that was circulated by the lead. Some items are still pertinent and critical, while others were determined to be too broad and in need of modification or clarification. The list will be re-prioritized and discussed further on next call. The CS Chair asked that members bring any new topics to the next Crops call.
- **2019 Sunset Materials.** Members volunteered to lead the 2019 sunset materials requests (see table above) and will determine the need for TRs on June 21.
- **List 3 Inerts (ZS).** The group discussed the draft proposal and proceeded to a vote.

    Motion to remove EPA List 3 -Inerts of unknown toxicity - for use only in passive pheromone dispensers, from 205.601(m)
    Motion by: ZS
    Seconded by: FT
    Additional discussion: none
    Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

- The meeting was adjourned.

Previous CS Notes

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

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)
EPA List 3 inerts (ZS) - discuss and vote

June 21, 2016

Sunset 2019 TR determinations
Soy Wax (FT) – petitioned material. Discuss and vote
2018 sunset: Ozone Gas (FT) - discuss and vote
2018 sunset: Peracetic acid (HA) - discuss and vote
2018 sunset: Calcium chloride (CBe) - discuss and vote
2018 sunset: Copper sulfate (ZS) - discuss and vote

July 5, 2016
- 1-MCP (ZS/HA) - discuss and vote
- Anaerobic Digestate (ZS) - discuss
- Hydroponics task force report - Preliminary discussion of report

July 19, 2016
- Hydroponics task force report – Discussion report and proposal
- Aluminum sulfate (JR)
- Biodegradable Biobased Mulch (HB)

August 2, 2016
- Marine materials (marine algae and extracts)
- Newspaper annotation change
- Strengthening seed guidance.

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 webinar	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

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National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday June 21, 2016 2:00 pm ET

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Emily Oakley (EO); Harold Austin (HA); Harriet Behar (HB); Tracy Favre (TF) - observer; Lisa de Lima - observer; Ashely Swaffar (AS) - observer; Jean Richardson (JR) - observer.
Absent: Jesse Buie (JB); Carmela Beck (CBe)
Staff: Michelle Arsenault (MA), 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.	Jul 5	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 a	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.	Jul 5	Fall 2016

Petitioned Substances

Substance	Con-tact	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. LS voted on 06 22 16	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	Jul 5	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, Jul 5	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 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. 2007 crops technical report for amino acids, Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16	May 17	TBD
Ammonium Citrate 205.601 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. HS TR, Citric acid and salts, 2015. Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16	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, Jul 5	TBD
Polyoxin D Zinc salt			Petition sent to CS 06 16 16. Petition suff/TR Request due 08 16 16.		TBD

Inert Ingredients

Substance	Con-tact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Fall 2016?

Other Topics					
Project	**Con-tact**	**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 16requesting review.	Jul 5	TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23, Jul 19	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 01 12 16. TR request sent to NOP 02 05 16	Feb 2, Aug 2	TBD
Newspaper - annotation change	ZS		NOP approved request 01 12 16. TR request sent to NOP 06 21 16.	Aug 2?	TBD
Hydroponics	ZS		Report due from Task Force ~June. Deadline extended to mid-July.DD or proposal?	Jul 19	Fall 2016
Research Priorities	All	NA	RPs due to MS Aug 2016	Jun 7	Fall 2016
Strengthen and clarify the requirements for use of organic seed (NOP 5029)	ZS/HB		Originated in MS. Draft DD in development	Aug 2	

2019 Sunsets (TR requests) Summary: Spr 2017 Review: Fall 2017					
Substance	**Contact**	**TR request?**	**Notes**	**Scheduled, Discussed, Voted**	**Meeting**
Calcium hypochlorite 205.601(a)	FT	N		Jun 21	Summary Spr 17

Chlorine dioxide 205.601(a)	FT	N		Jun 21	
Sodium hypochlorite 205.601(a)	FT	N		Jun 21	
Herbicides, soap-based 205.601(b)	EO	N		Jun 21	
Biodegradable biobased mulch film 205.601(b)	HB	Y		Jun 21	
Boric acid 205.601(e)	HB	N		Jun 21	
Sticky traps/barriers 205.601(e)	EO	N		Jun 21	
Copper sulfate 205.601(i)	ZS	N		Jun 21	
Coppers, fixed 205.601(i)	ZS	N		Jun 21	
Humic acids 205.601(j)	CBe	N	2012 TR for oxidized lignite/humic acid derivatives	Jun 21	
Soluble boron products 205.601(j)	ZS	N		Jun 21	
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	ZS	N		Jun 21	
Vitamin B1 205.601(j)	CBe	N		Jun 21	
Vitamin C 205.601(j)	CBe	N		Jun 21	
Vitamin E 205.601(j)	CBe	N		Jun 21	
Lead salts 205.602(d)	FT	N		Jun 21	
Tobacco dust (nicotine sulfate) 205.602(i)	HB	N		Jun 21	

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

Agenda

- Approve Crops Subcommittee notes of June 7
- Sunset 2019 TR determinations
- Research Priorities - Continue prioritization and be prepared with any additional ones.

- Soy Wax (FT) - petitioned material. Discuss and vote
- 2018 sunset: Ozone Gas (FT) - discuss and vote
- 2018 sunset: Peracetic acid (HA) - discuss and vote
- 2018 sunset: Calcium chloride (CBe) - discuss and vote
- 2018 sunset: Copper sulfate (ZS) - discuss and vote
- Adjourn

Discussion

- **Crops Subcommittee notes of June 7** were approved with no changes
- **Sunset 2019 TR determinations.** The group discussed the need for TRs for the 2019 sunset materials. See table above and discussion below
    - **Biodegradable mulch (HB).** Members supported the need for a limited scope TR with targeted questions. The lead asked for feedback from the members and will report back on a future call.
    - **Boric acid (HB).** Although the TR is old, the lead feels that a new TR would have limited usefulness.
    - **Sticky traps/barriers.** The TAP review is from 1995, however, the group agreed this is a relatively benign material and a TR is not needed.
    - **Copper sulfate, Coppers, fixed (ZS).** These materials are included in the Research Priorities, and therefore the group feels a TR is not needed.
    - **Humic acids (CBe).** There is a 1996 TAP and a 2006 TR on file, as well as a 2012 TR for oxidized lignite, which addressed other humic acid derivatives. The lead noted, via the CS Chair, that a TR likely would not provide new information, however, it could provide updated information regarding international regulations and potential environmental contamination from manufacture, use, misuse or disposal, if applicable. The CS will not request a new TR. The NOP will cross-reference the oxidized lignite TR on the Petitioned Substance Database.
    - **Lead salts** are currently prohibited and the lead feels no TR is necessary.
    - **Tobacco dust** is currently prohibited and the lead feels no TR is necessary.
- **Research Priorities.** The members discussed the list of research priorities and will continue to prioritize the existing ones and discuss any additional topics. In an effort to make the list more concise, the items will be divided into two groups: higher priority and lower priority. The group also discussed the criteria for determining what belongs on the research priorities list.
- **Soy Wax (FT).** The CS briefly discussed the draft proposal and will discuss it further and potentially vote on the next call.
- **2018 sunset: Ozone Gas (FT).** The lead briefly summarized ozone, which is currently allowed as an irrigation system cleaner; the substance was unanimously relisted twice before.

  Motion to remove ozone gas from the National List at §205.601(a)
  Motion by: FT
  Seconded by: HA
  Additional discussion: none
  Yes: 0 No: 4 Abstain: 1 Absent: 2 Recuse: 0

- **2018 sunset: Peracetic acid (HA).** The lead summarized the material and its uses, and noted a 2011 recommendation to annotate as well as a recently received TR. The CS proceeded to a vote. The lead author will forward the proposal to the CS Chair for submission to the NOP.

  Motion to remove peracetic acid from the National List at §205.604(a) and 205.604(i)
  Motion by: HA
  Seconded by: EO
  Additional discussion: none
  Yes: 0 No: 5 Abstain: 0 Absent: 2 Recuse: 0

- The Chair informed the members that the Hydroponics Task Force was granted an extension to submit its report. The final report will be due to the Crops Subcommittee in mid-July, therefore the Subcommittee discussion will be moved to the July 19 call.
- **2018 sunset: Calcium chloride (CBe).** Deferred to next call
- **2018 sunset: Copper sulfate (ZS).** Deferred to next call
- **The meeting was adjourned.**

Previous CS Notes

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

June 7, 2016
- Research Priorities (All)
- EPA List 3 inerts (ZS) - discuss and vote

June 21, 2016
- Sunset 2019 TR determinations
- Soy Wax (FT) - petitioned material. Discuss and vote
- 2018 sunset: Ozone Gas (FT) - discuss and vote
- 2018 sunset: Peracetic acid (HA) - discuss and vote
- 2018 sunset: Calcium chloride (CBe) - discuss and vote
- 2018 sunset: Copper sulfate (ZS) - discuss and vote

July 5, 2016
- Soy Wax (FT) - discuss proposal and vote
- 2018 sunset: Calcium chloride (CBe) - discuss and vote
- 2018 sunset: Copper sulfate (ZS) - discuss and vote
- 1-MCP (ZS/HA) - discuss and vote
- Anaerobic Digestate (ZS) - discuss
- Hydroponics task force report - preliminary discussion of report
- Polyoxin D Zinc salt - assign lead

July 19, 2016
- Research Priorities - Discuss and approve list
- Hydroponics task force report - Discuss report and proposal
- Aluminum sulfate (JR) - Discuss proposal
- Biodegradable Biobased Mulch (HB) - Discuss draft discussion document

August 2, 2016
- Marine materials (marine algae and extracts) - TR in development
- Newspaper annotation change. Waiting for TR
- Strengthening seed guidance - Discuss draft discussion document

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

2:00

Fall 2016 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	June/TBD
NOP - Complete fall 2016 NOSB meeting tentative agenda	Sept 8, 2016
NOSB - Fall 2016 proposals due to NOP	Sept 14, 2016
NOP - Post proposals	On or before Sept 27, 2016
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 webinar	Nov 3, 2016
Work agendas finalized on ES call (last call before fall meeting)	Nov 4, 2016
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National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday July 5, 2016 2:00 pm ET

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Emily Oakley (EO); Harold Austin (HA); Harriet Behar (HB); Jesse Buie (JB); Carmela Beck (CBe); Tracy Favre (TF) - observer; Lisa de Lima - observer; Jean Richardson (JR) - observer
Absent: Devon Pattillo (DP)
Staff: Michelle Arsenault (MA); Jessica Walden (JW)

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.	Jul 5	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	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.	Jul 5	Fall 2016

Petitioned Substances

Substance	Con-tact	TR request?	Notes	Discussed, Voted	Meeting

Aluminum sulfate	FT	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. LS voted on 06 22 16	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	Jul 5	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, Jul 5	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. TR in development - expected late Summer 2016.	TBD	TBD
Ammonium Glycinate 205.601 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. 2007 crops technical report for amino acids, Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16. Petition found sufficient 07 05 16.	May 17, July 5	TBD
Ammonium Citrate 205.601 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. HS TR, Citric acid and salts, 2015. Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16. Petition found sufficient 07 05 16.	May 17, July 5	TBD
Anaerobic Digestate 205.203	ZS		New petition sent to MS 04 22 16. Under review for eligibility at request of NOP. TR request sent to NOP 07 05 16	May 17, Jul 5	TBD
Polyoxin D Zinc salt	JB		Petition sent to CS 06 16 16. Petition suff/TR Request due 08 16 16.	Aug 2	TBD
Potassium Cellulose Glycolate (Potassium CMC)	EO		Petition sent to CS 06 28 16. Petition suff/TR Request due 08 30 16.	Jul 19	TBD
Inert Ingredients					

Substance	Con-tact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Fall 2016?
Other Topics					
Project	**Con-tact**	**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. 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. TR request sent to NOP 07 05 16 (see anaerobic digestate above)	Jul 5	TBD
Biodegradable Biobased Mulch	HB	DD		Feb 2, Feb 23, Jul 19	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 01 12 16. TR request sent to NOP 02 05 16	Feb 2, Aug 2	TBD
Newspaper - annotation change	ZS		NOP approved request 01 12 16. TR request sent to NOP 06 21 16.	Aug 2?	TBD
Hydroponics	ZS		Report due from Task Force ~June. Deadline extended to mid-July.DD or proposal?	Jul 19	Fall 2016
Research Priorities	All	NA	RPs due to MS Aug 2016	Jun 7	Fall 2016
Strengthen and clarify the requirements for use of organic seed (NOP 5029)	ZS/HB		Originated in MS. Draft DD in development	Aug 2	
2019 Sunsets (TR requests) **Summary: Spr 2017 Review: Fall 2017**					

Substance	Contact	TR request?	Notes	Scheduled, Discussed, Voted	Meeting
Calcium hypochlorite 205.601(a)	FT	N		Jun 21	Summary Spr 17
Chlorine dioxide 205.601(a)	FT	N		Jun 21	
Sodium hypochlorite 205.601(a)	FT	N		Jun 21	
Herbicides, soap-based 205.601(b)	EO	N		Jun 21	
Biodegradable biobased mulch film 205.601(b)	HB	Y		Jun 21	
Boric acid 205.601(e)	HB	N		Jun 21	
Sticky traps/barriers 205.601(e)	EO	N		Jun 21	
Copper sulfate 205.601(i)	ZS	N		Jun 21	
Coppers, fixed 205.601(i)	ZS	N		Jun 21	
Humic acids 205.601(j)	CBe	N	2012 TR for oxidized lignite/humic acid derivatives	Jun 21	
Soluble boron products 205.601(j)	ZS	N		Jun 21	
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	ZS	N		Jun 21	
Vitamin B1 205.601(j)	CBe	N		Jun 21	
Vitamin C 205.601(j)	CBe	N		Jun 21	
Vitamin E 205.601(j)	CBe	N		Jun 21	
Lead salts 205.602(d)	FT	N		Jun 21	

Tobacco dust (nicotine sulfate) 205.602(i)	HB	N		Jun 21	

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

Agenda

- Approve Crops Subcommittee notes of June 21
- Research Priorities
- Biodegradable Biobased mulch (HB)
- Potassium cellulose glycolate (Potassium CMC) petition - assign lead
- Polyoxin D Zinc salt - assign lead
- Ammonium citrate and ammonium glycinate (EO) - schedule petition supplement sufficiency
- Anaerobic Digestate (ZS).
- Soy Wax (FT) - discuss and vote
- 2018 sunset: Calcium chloride (CBe) - discuss and vote.
- 2018 sunset: Copper sulfate (ZS) - discuss and vote.
- 1-MCP (ZS/HA).
- Adjourn.

Discussion

- **Crops Subcommittee notes** of June 21 were approved with no changes
- **Research Priorities.** The group discussed the research priorities draft document, specifically the biodegradable biobased mulch topic.
- **Biodegradable biobased mulch (HB).** The members briefly discussed the research priority topic on Biodegradable biobased mulch. The CS Chair suggested composing targeted questions for a limited scope TR request, which will be submitted to the NOP after the next Crops call.
- **Potassium cellulose glycolate (Potassium CMC) petition.** EO volunteered to be the lead reviewer for this material. Potassium cellulose glycolate is used in conjunction with fertilizers as a water absorbing agent. There was some question among the Subcommittee members as to its use in crop production. Members will discuss petition sufficiency on the next call.
- **Polyoxin D Zinc salt.** Re-petitioned material. JB volunteered to lead this, with assistance from HA who was the previous lead. The CS will discuss petition sufficiency on the August 2 call.
- **Ammonium citrate and ammonium glycinate (EO).** The lead provided some background information regarding the definition of chelate vs. chelating agents and the group discussed necessity and alternatives. The petitions were found sufficient and the group will move to a discussion and vote on the August 2 call.
- **Anaerobic Digestate (ZS).** The lead summarized the draft document and the members discussed the potential questions to include in the TR request. The TR request will be sent to the NOP
- **Soy Wax (FT).** The members discussed language for the proposal regarding non-GMO soybeans and commercial availability. A member noted that the clause regarding (excluded methods?) does not apply to §205.601, so it would be helpful to be explicit here. FT will add some language and resend it to the group for review.

  Motion to classify soy wax as petitioned as synthetic
  Motion by: FT
  Seconded by: HA
  Additional discussion: none
  Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

  Motion to add soy wax 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 if soy wax from organic soybeans is not commercially available.
Motion by: FT
Seconded by: EO
Additional discussion: none
Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

- **2018 sunset: Calcium chloride (CBe).** Calcium chloride is a non-synthetic substance prohibited for use in organic crop production. There is no new information and while there was not much public comment during the first posting in Spring 2016, commenters were in favor of its continued prohibition.

  Motion to remove calcium chloride at §205.602
  Motion by: CBe
  Seconded by: HA
  Additional discussion: A member noted that this material is used extensively on apples and cherries in the Pacific Northwest. Another member noted that she uses it extensively in California on heirloom varieties of apples. .
  Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

- **2018 sunset: Copper sulfate (ZS).** Copper sulfate is used for two different orders of pests. The lead noted that while it is a common material, it is arcane, and the pests are not common.
  Copper is on the Crops list of research priorities, and there is new research on alternatives.

  Motion to remove copper sulfate from §205.601(i) based on OFPA criteria of essentiality
  Motion by: ZS
  Seconded by: HA
  Additional discussion: none
  Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

- **1-MCP (ZS/HA).** Used to slow ripening and retard spoilage in post-harvest storage. The lead indicated that 1-MCP does not satisfy criteria 3: compatibility and alternatives. Although there is no direct material that is an alternative, there are broader alternative practices, and therefore feels this material is not necessary. The lead added that it is synthetic, and not exempt from having to be listed for post-harvest use. Another member added that it is used in conventional products, and although it's used post-harvest, there is no detectable residue.

  Motion to classify 1-MCP as petitioned as synthetic
  Motion by: ZS
  Seconded by: EO
  Additional discussion: none
  Yes: 7 No: 0 Abstain: 0 Absent: 0 Recuse: 0

  Motion to add 1-MCP as petitioned at §205.601
  Motion by: ZS
  Seconded by: HA
  Additional discussion: none
  Yes: 0 No: 7 Abstain: 0 Absent: 0 Recuse: 0

- **The meeting was adjourned**

Previous CS Notes

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

June 21, 2016

- Sunset 2019 TR determinations
- Soy Wax (FT) - petitioned material. Discuss and vote
- 2018 sunset: Ozone Gas (FT) - discuss and vote
- 2018 sunset: Peracetic acid (HA) - discuss and vote
- 2018 sunset: Calcium chloride (CBe) - discuss and vote
- 2018 sunset: Copper sulfate (ZS) - discuss and vote

July 5, 2016

- Soy Wax (FT) - discuss proposal and vote
- 2018 sunset: Calcium chloride (CBe) - discuss and vote
- 2018 sunset: Copper sulfate (ZS) - discuss and vote
- 1-MCP (ZS/HA) - discuss and vote
- Anaerobic Digestate (ZS) - discuss
- Hydroponics task force report - preliminary discussion of report – deferred. No report available
- Polyoxin D Zinc salt - assign lead

July 19, 2016

- Hydroponics task force report - Discuss report and proposal
- Aluminum sulfate (FT) - Discuss proposal
- Biodegradable Biobased Mulch (HB) - Discuss draft discussion document and TR questions
- Potassium cellulose glycolate (EO) - Petition sufficiency.

August 2, 2016

- Marine materials (marine algae and extracts) - TR in development
- Newspaper annotation change. Waiting for TR
- Strengthening seed guidance - Discuss draft discussion document
- Polyoxin D Zinc salt. Petition sufficiency
- Ammonium citrate and glycinate (EO) - Petition sufficiency.

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 - Publish FRN, Open public comment	June/TBD
NOP - Complete fall 2016 NOSB meeting tentative agenda	Sept 8, 2016
NOSB - Fall 2016 proposals due to NOP	Sept 14, 2016
NOP - Post proposals	On or before Sept 27, 2016
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 webinar	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

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 19, 2016 2:00 pm ET

Present: Zea Sonnabend, Chair (ZS); Francis Thicke, Vice Chair (FT); Emily Oakley (EO); Harold Austin (HA); Jesse Buie (JB); Harriet Behar (HB); Jean Richardson (JR) - observer
Absent: Carmela Beck (CBe)
Staff: Michelle Arsenault (MA); 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.	Jul 5	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	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.	Jul 5	Fall 2016

Petitioned Substances

Substance	Con-tact	TR request?	Notes	Discussed, Voted	Meeting
Aluminum sulfate	FT	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. LS voted on 06 22 16	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	Jul 5	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, Jul 5	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. TR in development - expected late Summer 2016.	TBD	TBD
Ammonium Glycinate 205.601 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. 2007 crops technical report for amino acids, Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16. Petition found sufficient 07 05 16.	May 17, July 5	TBD
Ammonium Citrate 205.601 Petition Addendum #1	EO		Petition sent to CS 03 31 16. Petition suff/TR Request due 05 31 16. HS TR, Citric acid and salts, 2015. Found insufficient. Sent Qs to petitioner. Petition addendum sent to CS 06 13 16. Petition found sufficient 07 05 16.	May 17, July 5	TBD
Anaerobic Digestate 205.203	ZS		New petition sent to MS 04 22 16. Under review for eligibility at request of NOP. TR request sent to NOP 07 05 16	May 17, Jul 5	TBD
Polyoxin D Zinc salt	JB		Petition sent to CS 06 16 16. Petition suff/TR Request due 08 16 16.	Aug 2	TBD

Potassium Cellulose Glycolate (Potassium CMC)	EO		Petition sent to CS 06 28 16. Petition suff/TR Request due 08 30 16.	Jul 19, Aug 16	TBD
Allyl Isothiocyanate (AITC) Petition (2016)	JB		Petition sent to CS 07 06 16. Petition suff/TR Request due 09 06 16. • AITC Petition (2013) (PDF) • NOSB Subcommittee Proposal (2014) (PDF) • Technical Evaluation Report (2014) (PDF)	TBD	TBD

Inert Ingredients

Substance	Con-tact	TR rqstd?	Notes*	Vote	Meeting
EPA List 4 Inerts annotation change	ZS	N/A	Update from IWG	NA	Fall 2016?

Other Topics

Project	Con-tact	Doc type	Notes*	Disc/Vote	Meeting
Contamination Issues in Farm Inputs	FT/HB		Report. On HOLD pending compost ruling.	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. 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. TR request sent to NOP 07 05 16 (see anaerobic digestate above)	Jul 5	TBD
Biodegradable Biobased Mulch	HB	DD	Limited scope TR request will be sent to NOP in late July	Feb 2, Feb 23, Jul 19	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 01 12 16. TR request sent to NOP 02 05 16	Feb 2, Aug 2	TBD
Newspaper - annotation change	ZS		NOP approved request 01 12 16. TR request sent to NOP 06 21 16. TR in development	Aug 2?	TBD

Hydroponics	ZS		Report due from Task Force ~June. Deadline extended to mid-July. DD or proposal?	Aug 2	Fall 2016
Research Priorities	All	NA	RPs due to MS Aug 2016	Jun 7	Fall 2016
Strengthen and clarify the requirements for use of organic seed (NOP 5029)	ZS/HB		Originated in MS. Draft DD in development	Aug 2	
2019 Sunsets (TR requests) **Summary: Spr 2017 Review: Fall 2017**					
Substance	**Contact**	**TR request?**	**Notes**	**Scheduled, Discussed, Voted**	**Meeting**
Calcium hypochlorite 205.601(a)	FT	N		Jun 21	Summary Spr 17
Chlorine dioxide 205.601(a)	FT	N		Jun 21	
Sodium hypochlorite 205.601(a)	FT	N		Jun 21	
Herbicides, soap-based 205.601(b)	EO	N		Jun 21	
Biodegradable biobased mulch film 205.601(b)	HB	Y		Jun 21	
Boric acid 205.601(e)	HB	N		Jun 21	
Sticky traps/barriers 205.601(e)	EO	N		Jun 21	
Copper sulfate 205.601(i)	ZS	N		Jun 21	
Coppers, fixed 205.601(i)	ZS	N		Jun 21	
Humic acids 205.601(j)	CBe	N	2012 TR for oxidized lignite/humic acid derivatives	Jun 21	
Soluble boron products 205.601(j)	ZS	N		Jun 21	

Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt 205.601(j)	ZS	N		Jun 21	
Vitamin B1 205.601(j)	CBe	N		Jun 21	
Vitamin C 205.601(j)	CBe	N		Jun 21	
Vitamin E 205.601(j)	CBe	N		Jun 21	
Lead salts 205.602(d)	FT	N		Jun 21	
Tobacco dust (nicotine sulfate) 205.602(i)	HB	N		Jun 21	

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

Agenda

- Approve Crops Subcommittee notes of July 5
- Aluminum sulfate (FT) - Discuss proposal
- Biodegradable Biobased Mulch (HB) - Discuss draft discussion document and TR questions
- Potassium cellulose glycolate (EO) - Petition sufficiency
- Hydroponics task force report - Discuss report and proposal
- Allyl Isothiocyanate (AITC) Petition - Assign lead
- Check-in on future call schedule topics
- Adjourn

Discussion

- **Crops Subcommittee notes** of July 5 were approved with minor changes under Biodegradable Biobased Mulch.
- **Aluminum sulfate (FT).** The lead circulated a draft document and noted that the Livestock Subcommittee (LS) also reviewed this material and voted to not add it. In livestock, aluminum sulfate is used as a poultry litter amendment used to reduce ammonia. The LS found there was a non-synthetic alternative. For crops, aluminum sulfate has been petitioned to allow application of manure that has been treated with aluminum sulfate. Members discussed the role of the substance in mitigating soil phosphorous levels, as described by the petition. The CS proceeded to a vote.

  Motion to classify aluminum sulfate as petitioned as synthetic
  Motion by: FT
  Seconded by: HB
  Additional discussion:
  Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

  Motion to add aluminum sulfate as petitioned at §205.601.
  Motion by: FT
  Seconded by: HB

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

- **Biodegradable biobased mulch (HB).** The group discussed the difference between the document that was written for the Research Priorities and the limited scope TR request. Members discussed a draft list of questions for the TR and will recirculate these via email before submitting the request to the NOP.
- **Potassium cellulose glycolate (EO).** The lead summarized the material's manufacture and use. The CS found the petition sufficient and determined a TR is unnecessary. The lead will draft a proposal for discussion on the August 16 call. Potassium cellulose glycolate is used for water retention, and the petitioner noted benefits of recovering and conserving dripped water.
- **Hydroponics Task Force report** has not been received by the Crops Subcommittee. The CS noted that time will be limited to develop a proposal by the fall meeting. CS will consider how to proceed once they receive the report.
- **Allyl isothiocyanate (AITC) petition (2016).** JB volunteered to be lead author on this substance. Allyl isothiocyanate (AITC) was originally petitioned as a fumigant in 2013 and was subsequently withdrawn by the petitioner. This substance is a synthetic version of mustard seed meal, and it is being petitioned for use as a nematicide and fungicide. A member asked about the use of a synthetic in light of the fact that a natural nonsynthetic alternative exists. The petitioner has claimed there is an inadequate supply of the nonsynthetic form.
- **Future call schedule.**
    - **Contamination issues in farm inputs.** Postponed to a future meeting.
    - The CS has requested to have a **speaker from the Seed Alliance at the fall NOSB meeting** and is awaiting NOP approval.
    - **Inerts update at fall meeting.** The Chair asked for an update from the Inerts working group ingredients (National List) and whether NOP or a member of the Safer Choice program (SCIL) could deliver an update at the fall meeting. The NOP will discuss this and report back to the CS Chair.
- **The meeting was adjourned**

Previous CS Notes

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

July 5, 2016

Soy Wax (FT) - discuss proposal and vote
2018 sunset: Calcium chloride (CBe) - discuss and vote
2018 sunset: Copper sulfate (ZS) - discuss and vote
1-MCP (ZS/HA) - discuss and vote
Anaerobic Digestate (ZS) - discuss
Hydroponics task force report - preliminary discussion of report – deferred. No report available
Polyoxin D Zinc salt - assign lead

July 19, 2016

Aluminum sulfate (FT) - Discuss proposal
Biodegradable Biobased Mulch (HB) - Discuss draft discussion document and TR questions
Potassium cellulose glycolate (EO) - Petition sufficiency.
Allyl Isothiocyanate (AITC) Petition (2016) - assign lead?

August 2, 2016

Hydroponics task force report - Discuss report and proposal
Marine materials (marine algae and extracts) - TR in development
Newspaper annotation change - TR in development
Strengthening seed guidance - Discuss draft discussion document
Polyoxin D Zinc salt - Petition sufficiency
Ammonium citrate and glycinate (EO) - Petition sufficiency.

August 16, 2016
Potassium cellulose glycolate (EO) - discuss proposal
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 - Publish FRN, Open public comment	June/TBD
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NOSB - Fall 2016 proposals due to NOP	Sept 14, 2016
NOP - Post proposals	On or before Sept 27, 2016
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Public comment webinar	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