

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Crops Subcommittee (CS) Notes
Tuesday, April 1, 2025 2:00 pm ET

Present: Logan Petrey (LP), Chair; Nate Lewis (NL), Vice Chair; Amy Bruch (ADB); Brian Caldwell (BC); Franklin Quarcoo (FQ); Corie Pierce (CP)

Absent: Amanda Felder (AF); Jo Mirenda (JM)

Staff: Michelle Arsenault (MA); Heather Kumar (HK)

Agenda

- Review March 18, 2025 notes
- TR determinations for 2028 sunsets (All)
- Additional items
- Adjourn

Discussion

- **March 18, 2025 notes** were approved as written.
- **TR determinations for 2028 sunsets.**
 - The CS will request a limited scope TR for the four chlorine materials. See table below.
- **Additional items.**
 - The draft TR on compostables was sent to the Crops Subcommittee March 31 and the Subcommittee will determine sufficiency quickly. The lead will send a follow up email later this week with his recommendation and rationale, let the rest of the Subcommittee weigh in by the following Monday, and then forward it to the NOP by no later than April 11.
 - Comments are open and given that the commenting deadline is right before the meeting, the Board members have encouraged stakeholders to submit early if possible. The NOSB Chair encouraged members to attend the webinar practice sessions so they can talk through the process. The Food Tech and team are going to summarize the comments each week up until the meeting, so Board members can monitor them intermittently. If the bulk of comments come in during the last week, then they will focus on the documents that might be voted on.
- **The meeting was adjourned**

[Previous CS Notes](#)

Future call schedule (1st and 3rd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted)

March 18, 2025

April 1, 2025

TR determinations for 2028 sunsets

April 15, 2025

Compostables (NL) - TR sufficiency due 5.27.25 (scheduled to be completed before call)

TR determinations for 2028 sunsets

May 6, 2025

May 20, 2025

June 3, 2025

June 17, 2025 - LP out of town

July 1, 2025

July 15, 2025

August 5, 2025

August 19, 2025
 September 2, 2025
 September 16, 2025
 October 7, 2025
 October 21, 2025
 November 4, 2025
 November 18, 2025
 December 2, 2025
 December 16, 2025

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Petitioned Substances

Substance	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Pear Ester add to 205.601	FQ	Proposal	Petition sent to CS 10.05.23. Petition suff/TR request due 12.04.23. Petition found sufficient/CS requested TR 11.21.23. Draft TR sent to CS 5.17.24. TR Suff due 7.16.24. TR found sufficient 7.2.24.		Spr 2025

Other Projects

Project	Contact	Notes*	Scheduled/ status	Target meeting
Compostables proposal	NL/AF	NOP memo sent to NOSB October 11, 2023 CS requested TR on compostables 9.17.24. TR expected April 2025	11.19.24 12.17.24 1.21.25	Spr 2025
Synthetic Compost Feedstocks discussion document	NL/AF	NOP memo sent to NOSB October 11, 2023 CS requested TR on compostables 9.17.24. TR expected April 2025. TR draft sent to CS 3.31.25. TR sufficiency due 5.27.25	1.21.25 1.28.25 5.6.25	Spr 2025
Research Priorities	BC	Spring 2025 list due to MS by January 9, 2025	1.7.25	Spr 2025
Biodegradable Biobased Mulch Film (BBMF)	TBD	Previous NOSB work (2012 – 2021) NOP memo sent to NOSB September 8, 2023. Crops will not work on this at this time. On hold.	9.19.23 10.3.23	TBD

2027 Sunset Review

TR Requests (June 2024), Summary (Spr 2025), Review (Fall 2025)

Substance	National List	Con tact	TR Request?	Notes*	Scheduled/ status	Target meeting
Potassium hypochlorite	205.601(a)(2)(iv)	FQ	Y Lmtd Scope	Sunset date: 04/22/2027 TR: 2011 TR (chlorine materials) 2019/Fall - Rec to ADD 03/23/2022 87 FR 16371	5.21.24 11.19.24 2.4.25	Summary: Spr 2025 Review: Fall 2025

				TR due early Nov 2024. TR sent to CS 11.12.24. TR suff due 1.11.25. TR found sufficient 11.19.24.		
Soap-based algicide/demosers	205.601(a)(7)	ADB	N	Sunset date: 03/15/2027 TAP: 1996 TR: 2015 (Soap-Based Algicide/Demosers) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	1.7.25	" "
Ammonium carbonate	205.601(e)(1)	LP	N	Sunset date: 03/15/2027 TAP: 1995 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.3.24	" "
Soaps, insecticidal	205.601(e)(8)	ADB	N	Sunset date: 03/15/2027 TAP: 1994 TR: 2020 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 1.7.25	" "
Sucrose octanoate esters	205.601(e)(10)	FQ	Y Lmt'd scope	Sunset date: 03/15/2027 TR: 2005 2018/Fall - Rec to REMOVE 02/28/2022 87 FR 10930. TR sent to LS/CS 12.18.24. Sufficiency due 2.16.25. TR found sufficient 1.28.25.	1.28.25 2.4.25	" "
Vitamin D3	205.601(g)	ADB	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2011 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	1.7.25	" "
Aquatic plant extracts	205.601(j)(1)	NL	Y Lmt'd Scope	Sunset date: 03/15/2027 TAP: 2005 TR: 2006 TR: 2016 (Marine plants & algae) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due early October 2024. TR sent to CS 10.3.24. Suff due 12.2.24. TR found sufficient 11.19.24.	11.19.24 2.4.25	" "
Lignin sulfonate	205.601(j)(4)	LP	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2011 TR: 2020 (Lignins) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24	" "

Fatty alcohols (C6, C8, C10, and/or C12)	205.601(k)(2)	BC	N	Sunset date: 04/22/2027 TR: 2016 (C8, C10) 2019/Fall - Rec to ADD 03/23/2022 87 FR 16371	12.3.24	“ “
Sodium silicate	205.601(l)	NL	Y Lmt'd Scope	Sunset date: 03/15/2027 TAP: 1996 TR: 2011 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due late Nov 2024. Tr sent to CS 12.18.24. Sufficiency due 2.16.25. TR found sufficient 1.7.25.	1.7.25	“ “
EPA List 4 Inerts	205.601(m)(1)	BC/ NL	N	Sunset date: 03/15/2027 TR: 2015 (Nonylphenol ethoxylates) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24 1.7.25	“ “
Paper – (o) Production aids. (2) Paper-based crop planting aids as defined in § 205.2 . Virgin or recycled paper without glossy paper or colored inks.	205.601(o)(2)	LP	N	Sunset date: 12/14/2027 TAP: 1995 (Newspaper, recycled paper) TR: 2006 (Newspaper, recycled paper) TR: 2017 (Newspaper, recycled paper) TR: 2019 (Paper-based crop planting aids) 2021/Spring - Rec to ADD 11/14/2022 87 FR 68021	5.21.24 12.3.24 12.17.24	“ “
Arsenic	205.602(b)	JD -> CP	N	Sunset date: 03/15/2027 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.3.24 12.17.24	“ “
Strychnine	205.602(i)	AF	N	Sunset date: 03/15/2027 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.17.24	“ “

Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	March 28, 2025	16 -20
NOP - Draft Spring 2025 NOSB meeting tentative agenda	Feb 7, 2025	~ 10
NOSB - Spring 2025 proposals due to NOP	Feb 13, 2025	~ 9
NOP - Post proposals	March 28, 2025	7.5

Public comment closes	April 28, 2025	3.5
NOP - Send compiled public comments to NOSB	April 29, 2025	3
Public comment webinars	Apr 22 & 24, 2025	1
Spring 2025 NOSB meeting - virtual	Apr 29 - May 1, 2025	0
Final recommendations due	May 29, 2025	30 days post meeting

Fall 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 15, 2025	24
NOP - Draft Fall 2025 NOSB meeting agenda	Aug 8, 2025	~11
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Public comment webinars	Oct 28 & 30, 2025	1
Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~30 days post

2028 Sunset Review

TR Requests (June 2025), Summary (Spr 2026), Review (Fall 2026)

Previous Sunset Recommendations: [2021/Fall - Rec to Renew](#)

Previous Rule/Renewals: [04/14/2023, 88 FR 22893](#)

Substance	National List	Con tact	TR Request ?	Notes	Scheduled/ status	Target meeting
Chlorine Materials: Calcium hypochlorite	205.601(a)(2)(i)	LP	Y - Lmt'd Scope	Sunset date: 5/29/2028 2011 TR (Chlorine/Bleach) 2006 TR (Chlorine/Bleach) 1995 TAP	3.18.25 4.1.25	Summary: Spr 2026 Review: Fall 2026
Chlorine Materials: Chlorine dioxide	205.601(a)(2)(ii)	LP	Y - Lmt'd Scope	Sunset date: 5/29/2028 2011 TR 2006 TR 1995 TR	3.18.25 4.1.25	" "
Chlorine Materials: Hypochlorous acid -	205.601(a)(2)(iii)	FQ	Y - Lmt'd Scope	Sunset date: 5/29/2028 2015 TR (Handling) 2011 TR (Chlorine/Bleach)	3.18.25 4.1.25	" "

generated from electrolyzed water				2006 TR (Chlorine/Bleach) 1995 TAP 04/2016 recommendation to add		
Chlorine Materials: Sodium hypochlorite	205.601(a)(2)(v)	FQ	Y - Lmt'd Scope	Sunset date: 5/29/2028 2011 TR (Chlorine/Bleach) 2006 TR (Chlorine/Bleach) 1995 TAP	3.18.25 4.1.25	" "
Copper sulfate	205.601(a)(3), and 205.601(e)(4)	BC	N	Sunset date: 5/29/2028 2011 TR (copper sulfate and other copper products) 2022 TR (copper products) 2001 TAP	3.18.25 4.1.25	" "
Ozone gas	205.601(a)(5)	AF/LP	N	Sunset date: 5/29/2028 2021 TR 2002 TAP	3.18.25 4.1.25	" "
Peracetic acid	205.601(a)(6), and 205.601(i)(8)	CP	N	Sunset date: 5/29/2028 2016 TR 2000 TAP	3.18.25 4.1.25	" "
Magnesium oxide	205.601(j)(5)	ADB	N	Sunset date: 5/29/2028 2021 TR	3.18.25 4.1.25	" "
EPA List 3 Inerts	205.601(m)(2)	NL	N	Sunset date: 5/29/2028 TR: N/A June 2023 NOP Memo requesting review of inert ingredients in pesticide products	3.18.25 4.1.25	" "
Calcium chloride	205.602(c)	CP/NL	N	Sunset date: 5/29/2028 2021 TR 2001 TAP	3.18.25 4.1.25	" "
Rotenone	205.602(f)	AF	N	Sunset date: 5/29/2028 TR: N/A	3.18.25 4.1.25	" "

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Present: Logan Petrey (LP), Chair; Nate Lewis (NL), Vice Chair; Brian Caldwell (BC); Amanda Felder (AF); Franklin Quarcoo (FQ); Corie Pierce (CP)

Absent: Amy Bruch (ADB)

Staff: Michelle Arsenault (MA); Heather Kumar (HK); Jo Mirenda (JM)

Agenda

- Review February 4, 2025 notes
- 2028 sunset assignments, discussion dates
- Review TR requests (quick discussion for new members)
- Additional items
- Adjourn

Discussion

- **February 4, 2025 notes** were approved via email on February 19
- **2028 sunset assignments, discussion dates.** The Chair assigned leads for the 2028 sunset substances (see table below).
- **Review TR requests.** The CS discussed the criteria for determining the need for a new TR for the benefit of new members.
- **Additional items.** None.
- **The meeting was adjourned**

[Previous CS Notes](#)

Future call schedule (1st and 3rd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted)

March 4, 2025 - cancelled

March 18, 2025

April 1, 2025

TR determinations for 2028 sunsets

April 15, 2025

TR determinations for 2028 sunsets

May 6, 2025

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July 1, 2025

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Work Agenda

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Petitioned Substances

Substance	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
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2027 Sunset Review

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Arsenic	205.602(b)	JD -> CP	N	Sunset date: 03/15/2027 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.3.24 12.17.24	" "
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NOSB - Spring 2025 proposals due to NOP	Feb 13, 2025	~ 9
NOP - Post proposals	Pending	7.5
Public comment closes	Pending	3.5
NOP - Send compiled public comments to NOSB	Pending	3
Public comment webinars	Apr 22 & 24, 2025	1

Spring 2025 NOSB meeting - virtual	Apr 29 - May 1, 2025	0
Final recommendations due	May 29, 2025	30 days post meeting

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Public comment webinars	Oct 28 & 30, 2025	1
Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~30 days post

2028 Sunset Review

TR Requests (June 2025), Summary (Spr 2026), Review (Fall 2026)

Previous Sunset Recommendations: [2021/Fall - Rec to Renew](#)

Previous Rule/Renewals: [04/14/2023, 88 FR 22893](#)

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Chlorine dioxide	205.601(a)(2)(ii)	LP		Sunset date: 5/29/2028 2011 TR 2006 TR 1995 TR	3.18.25	" "
Hypochlorous acid - generated from electrolyzed water	205.601(a)(2)(iii)	FQ		Sunset date: 5/29/2028 2015 TR (Handling) 2011 TR (Chlorine/Bleach) 2006 TR (Chlorine/Bleach) 1995 TAP 04/2016 recommendation to add	3.18.25	" "

Sodium hypochlorite	205.601(a)(2)(v)	FQ		Sunset date: 5/29/2028 2011 TR (Chlorine/Bleach) 2006 TR (Chlorine/Bleach) 1995 TAP	3.18.25	“ “
Copper sulfate	205.601(a)(3), and 205.601(e)(4)	BC		Sunset date: 5/29/2028 2011 TR (copper sulfate and other copper products) 2022 TR (copper products) 2001 TAP	3.18.25	“ “
Ozone gas	205.601(a)(5)	AF/LP		Sunset date: 5/29/2028 2021 TR 2002 TAP	3.18.25	“ “
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Magnesium oxide	205.601(j)(5)	ADB		Sunset date: 5/29/2028 2021 TR	3.18.25	“ “
EPA List 3 Inerts	205.601(m)(2)	NL		Sunset date: 5/29/2028 TR: N/A June 2023 NOP Memo requesting review of inert ingredients in pesticide products	3.18.25	“ “
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Rotenone	205.602(f)	AF		Sunset date: 5/29/2028 TR: N/A	3.18.25	“ “

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Present: Logan Petrey (LP), Chair; Nate Lewis (NL), Vice Chair; Amy Bruch (ADB); Brian Caldwell (BC); Amanda Felder (AF); Franklin Quarcio (FQ); Corie Pierce (CP)

Absent: Jo Mirenda (JM)

Staff: Michelle Arsenault (MA); Heather Kumar (HK)

Agenda

- Review January 28, 2025 notes
- Pear Ester proposal - petitioned (FQ). Discuss/vote
- 2027 Sunsets: Aquatic plant extracts (NL). Discuss review
- 2027 Sunsets: Potassium hypochlorite (FQ). Discuss review
- 2027 Sunsets: Sucrose octanoate esters (FQ). Discuss review
- Additional items
- Adjourn

Discussion

- **January 8 2025 notes** were approved with modifications suggested by members.
- **Pear Ester proposal - petitioned (FQ).** The lead summarized the petition, noting that it (pear ester) was previously grouped with pheromones, and is not actually a pheromone, but a kairamone. The CS discussed the need to parse the difference. The CS moved to a vote and will submit the proposal for the discussion at the Spring meeting.

Motion to classify pear ester as synthetic

Motion by: FQ

Seconded by: BC

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

Motion to add pear ester to the NL at §205.601(j)

Motion by: FQ

Seconded by: LP

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

- **2027 Sunsets: Aquatic plant extracts (NL).** The lead noted a previous NOSB recommendation on marine materials, which was ultimately not implemented by the NOP. The group discussed the current review and questions to stakeholders and will submit the document for the spring meeting.
- **2027 Sunsets: Potassium hypochlorite (FQ).** The lead summarized the review for the group, specifically environmental issues, alternatives, and questions to stakeholders. Members offered suggestions for modifications and the CS will submit the document for the Spring meeting.
- **2027 Sunsets: Sucrose octanoate esters (FQ).** The lead summarized the review for the group, and posed a question regarding the current annotation. He noted that there are few environmental concerns. A member added that there is only one EPA registered product, and it is expensive.
- **Additional items.** NL has organized a field trip after the Spring meeting to a composting facility and will provide more information as the meeting gets closer.
- **The meeting was adjourned**

[Previous CS Notes](#)

Future call schedule (1st and 3rd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted)

January 28, 2025

Synthetic Compost Feedstocks discussion document (NL). Vote.

2027 Sunsets: Sucrose octanoate esters (FQ). TR sufficiency

February 4, 2025

Pear Ester proposal - petitioned (FQ). Discuss/vote

2027 Sunsets: Aquatic plant extracts (NL). Discuss review

2027 Sunsets: Potassium hypochlorite (FQ). Discuss review

2027 Sunsets: Sucrose octanoate esters (FQ). Discuss review

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Other Projects

Project	Contact	Notes*	Scheduled/ status	Target meeting
Compostables proposal	NL/AF	NOP memo sent to NOSB October 11, 2023 CS requested TR on compostables 9.17.24. TR expected April 2025	11.19.24 12.17.24 1.21.25	Spr 2025
Synthetic Compost Feedstocks discussion document	NL/AF	NOP memo sent to NOSB October 11, 2023 CS requested TR on compostables 9.17.24. TR expected April 2025	1.21.25 1.28.25	Spr 2025
Research Priorities	BC	Spring 2025 list due to MS by January 9, 2025	1.7.25	Spr 2025
Biodegradable Biobased Mulch Film (BBMF)	TBD	Previous NOSB work (2012 – 2021) NOP memo sent to NOSB September 8, 2023. Crops will not work on this at this time. On hold.	9.19.23 10.3.23	TBD

2027 Sunset Review

TR Requests (June 2024), Summary (Spr 2025), Review (Fall 2025)

Substance	National List	Contact	TR Request?	Notes*	Scheduled/ status	Target meeting
Potassium hypochlorite	205.601(a)(2)(iv)	FQ	Y Lmtd Scope	Sunset date: 04/22/2027 TR: 2011 TR (chlorine materials) 2019/Fall - Rec to ADD 03/23/2022 87 FR 16371 TR due early Nov 2024. TR sent to CS 11.12.24. TR suff due 1.11.25. TR found sufficient 11.19.24.	5.21.24 11.19.24 2.4.25	Summary: Spr 2025 Review: Fall 2025
Soap-based algicide/demossers	205.601(a)(7)	ADB	N	Sunset date: 03/15/2027 TAP: 1996 TR: 2015 (Soap-Based Algicide/Demossers) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	1.7.25	" "
Ammonium carbonate	205.601(e)(1)	LP	N	Sunset date: 03/15/2027 TAP: 1995 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.3.24	" "
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Sucrose octanoate esters	205.601(e)(10)	FQ	Y Lmt'd scope	Sunset date: 03/15/2027 TR: 2005 2018/Fall - Rec to REMOVE 02/28/2022 87 FR 10930 . TR sent to LS/CS 12.18.24. Sufficiency due 2.16.25. TR found sufficient 1.28.25.	1.28.25 2.4.25	" "
Vitamin D3	205.601(g)	ADB	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2011 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	1.7.25	" "
Aquatic plant extracts	205.601(j)(1)	NL	Y Lmt'd Scope	Sunset date: 03/15/2027 TAP: 2005 TR: 2006 TR: 2016 (Marine plants & algae) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due early October 2024. TR sent to CS 10.3.24. Suff due 12.2.24. TR found sufficient 11.19.24.	11.19.24 2.4.25	" "
Lignin sulfonate	205.601(j)(4)	LP	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2011 TR: 2020 (Lignins) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24	" "
Fatty alcohols (C6, C8, C10, and/or C12)	205.601(k)(2)	BC	N	Sunset date: 04/22/2027 TR: 2016 (C8, C10) 2019/Fall - Rec to ADD 03/23/2022 87 FR 16371	12.3.24	" "
Sodium silicate	205.601(l)	MJ/ NL	Y Lmt'd Scope	Sunset date: 03/15/2027 TAP: 1996 TR: 2011 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due late Nov 2024. Tr sent to CS 12.18.24. Sufficiency due 2.16.25. TR found sufficient 1.7.25.	1.7.25	" "
EPA List 4 Inerts	205.601(m)(1)	BC/ NL	N	Sunset date: 03/15/2027 TR: 2015 (Nonylphenol ethoxylates) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24 1.7.25	" "

Paper – (o) Production aids. (2) Paper-based crop planting aids as defined in § 205.2 . Virgin or recycled paper without glossy paper or colored inks.	205.601(o)(2)	WT/ LP	N	Sunset date: 12/14/2027 TAP: 1995 (Newspaper, recycled paper) TR: 2006 (Newspaper, recycled paper) TR: 2017 (Newspaper, recycled paper) TR: 2019 (Paper-based crop planting aids) 2021/Spring - Rec to ADD 11/14/2022 87 FR 68021	5.21.24 12.3.24 12.17.24	“ “
Arsenic	205.602(b)	JD/C P	N	Sunset date: 03/15/2027 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.3.24 12.17.24	“ “
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Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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NOP - Draft Spring 2025 NOSB meeting tentative agenda	Feb 7, 2025	~ 10
NOSB - Spring 2025 proposals due to NOP	Feb 13, 2025	~ 9
NOP - Post proposals	Mar 3, 2025	7.5
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Public comment webinars	Apr 22 & 24, 2025	1
Spring 2025 NOSB meeting - Tempe, AZ	Apr 29 - May 1, 2025	0
Final recommendations due	May 29, 2025	30 days post meeting

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NOP - Publish FRN, Open public comment	~May 15, 2025	24
NOP - Draft Fall 2025 NOSB meeting agenda	Aug 8, 2025	~11
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Crops Subcommittee (CS) Notes
Tuesday, January 28, 2025 2:00 pm ET

Present: Logan Petrey (LP), Chair; Nate Lewis (NL), Vice Chair; Amy Bruch (ADB); Brian Caldwell (BC); Amanda Felder (AF); Franklin Quarcoo (FQ)

Absent: Heather Kumar (HK); Corie Pierce (CP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review January 21, 2025 notes
- Compost (NL)
- 2027 Sunsets: Sucrose octanoate esters (FQ). TR sufficiency
- Synthetic Compost Feedstocks discussion document (NL). Vote.
- 2027 Sunsets: Sucrose octanoate esters (FQ). TR sufficiency
- Pear Ester proposal - petitioned (FQ). Discuss/vote
- Additional items
- Adjourn

Discussion

- **January 21, 2025 notes** were accepted as written.
- **Compost (NL) - overview/update.** The lead provided a history of this topic for the benefit of members. This project is the culmination of two items: The first, a petition that came to the NOP, which the NOP then sent to the Board to work on; and secondly, a Board request to update and refresh the compost rules, given that they hadn't been updated in more than 20 years. NOSB passed a final recommendation at the Fall 2024 meeting that addresses part of the work agenda item. The Crops Subcommittee voted on another compost proposal during the last call that clarified that synthetic compost feedstocks must be added to the National List. The document is now considered final and will be submitted for the Spring meeting.
- **2027 Sunsets: Sucrose octanoate esters (FQ). TR sufficiency.** The lead summarized the TR and asked a question of the group about the lack of registered products. The group would like to determine if there are any products in use, and will discuss that on the next call when they complete the review for the spring meeting. The TR was found sufficient, and the Chair will let the NOP know.
- **Synthetic Compost Feedstocks discussion document (NL).** This discussion document explores synthetic compostable polymers, and includes discussion of residues and unavoidable residual environmental contamination (UREC). Members shared various ideas and thoughts about the impetus for this project and the path forward, and reviewed the questions to stakeholders. The CS moved to a vote and will forward to the full board for the Spring meeting.

Motion to accept the discussion document on synthetic compostable polymers

Motion by: NL

Seconded by: BC

Yes: 5 No: 0 Abstain: 1 Recuse: 0 Absent: 1

- **Pear Ester proposal - petitioned (FQ).** Deferred to next call.
- **Additional items.**
 - A member mentioned an idea for a possible field trip after the Spring NOSB meeting to look at a compost facility near Tempe.
- **The meeting was adjourned**

[Previous CS Notes](#)

Future call schedule (1st and 3rd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted)

January 21, 2025

Compostables proposal and discussion documents (NL/MJ) - discuss/vote

January 28, 2025

Synthetic Compost Feedstocks discussion document (NL). Vote.

2027 Sunsets: Sucrose octanoate esters (FQ). TR sufficiency

February 4, 2025

Pear Ester proposal - petitioned (FQ). Discuss/vote

2027 Sunsets: Aquatic plant extracts (NL). Discuss review

2027 Sunsets: Potassium hypochlorite (FQ). Discuss review

2027 Sunsets: Sucrose octanoate esters (FQ). Discuss review

February 18, 2025

March 4, 2025

March 18, 2025

April 1, 2025

April 15, 2025

May 6, 2025

May 20, 2025

June 3, 2025

June 17, 2025

July 1, 2025

July 15, 2025

August 5, 2025

August 19, 2025

September 2, 2025

September 16, 2025

October 7, 2025

October 21, 2025

November 4, 2025

November 18, 2025

December 2, 2025

December 16, 2025

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Petitioned Substances

Substance	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Pear Ester add to 205.601	FQ	Proposal	Petition sent to CS 10.05.23. Petition suff/TR request due 12.04.23. Petition found sufficient/CS requested TR 11.21.23. Draft TR sent to CS 5.17.24. TR Suff due 7.16.24. TR found sufficient 7.2.24.	2.4.25	Spr 2025

Other Projects

Project	Contact	Notes*	Scheduled/ status	Target meeting
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2027 Sunset Review

TR Requests (June 2024), Summary (Spr 2025), Review (Fall 2025)

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Crops Subcommittee (CS) Notes

Tuesday, January 21, 2025 2:00 pm ET

Present: Logan Petrey (LP), Chair; Nate Lewis (NL), Vice Chair; Mindee Jeffery (MJ); Franklin Quarcoo (FQ); Wood Turner (WT); Jerry D'Amore (JD); Brian Caldwell (BC); Amy Bruch (ADB); Amanda Felder (AF) - observer

Absent: None

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review January 7, 2025 notes
- Compostables Proposal and discussion document (NL/MJ) - discuss/vote
- Additional items
- Adjourn

Discussion

- **January 7, 2025 notes** were approved with a minor change.
- **Compostables Proposal (MJ/NL).** The group had an in-depth discussion of the current draft proposal, and several members suggested additional language to clarify the recommendation. The CS added language to clarify its intent, which is to reiterate that the Board must evaluate synthetic substances used as feedstocks. The CS moved to a vote, and will submit the document for the Spring meeting.

Motion to accept the proposal on compostables

Motion by: MJ

Seconded by: LP

Yes: 8 No: 0 Abstain: 0 Recuse: 0 Absent: 0

- **Synthetic Compost Feedstocks discussion document (NL/MJ).** The lead introduced the discussion document and noted that it directly addresses the petition and compost feedstocks and dovetails with the proposal on compostables. The CS is writing this document while waiting for a technical report (TR) in order to open the conversation and collect stakeholder feedback. The NOSB Chair reminded members to align the document with the [NOP memo](#). Another member suggested adding some background about UREC (unavoidable residual environmental contamination). The lead will make modifications, and the CS will vote on the document on the next call.
- **Additional items.** The CS added an extra call on January 28 to complete it's Spring 2025 meeting documents.
- **The meeting was adjourned**

[Previous CS Notes](#)

Future call schedule (1st and 3rd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted)

January 7, 2025

2027 Sunsets: Sodium silicate (MJ). Discuss review and TR sufficiency

2027 Sunsets: Soap-based algicide/demosers (ADB)

2027 Sunsets: Soaps, insecticidal (ADB)

2027 Sunsets: Vitamin D3 (ADB)

2027 Sunsets: EPA List 4 Inerts (BC/NL)

Research Priorities (All) - due to MS by 1.9.25

January 21, 2025

Compostables proposal and discussion documents (NL/MJ) - discuss/vote

January 28, 2025

Synthetic Compost Feedstocks discussion document (NL/MJ). Vote.

2027 Sunsets: Aquatic plant extracts (NL)

2027 Sunsets: Potassium hypochlorite (FQ). Discuss review and TR sufficiency

2027 Sunsets: Sucrose octanoate esters (FQ). TR sufficiency/sunset review

Pear Ester proposal - petitioned (FQ). Discuss/vote

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Public comment closes	Oct 8, 2025	~4
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Public comment webinars	Oct 28 & 30, 2025	1
Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~30 days post

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Crops Subcommittee (CS) Notes
Tuesday, January 7, 2025 2:00 pm ET

Present: Logan Petrey (LP), Chair; Nate Lewis (NL), Vice Chair; Amy Bruch (ADB); Brian Caldwell (BC); Mindee Jeffery (MJ); Franklin Quarcoo (FQ); Wood Turner (WT); Amanda Felder (AF) - observer

Absent: Javier Zamora (JZ); Jerry D'Amore (JD)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review December 17, 2024 notes
- 2027 Sunsets: Sodium silicate (MJ). Discuss review and TR sufficiency
- 2027 Sunsets: Soap-based algicide/demossers (ADB)
- 2027 Sunsets: Soaps, insecticidal (ADB)
- 2027 Sunsets: Vitamin D3 (ADB)
- 2027 Sunsets: EPA List 4 Inerts (BC/NL)
- Research Priorities (All) - due to MS by 1.9.25
- Additional items
- Adjourn

Discussion

- **December 17, 2024** were accepted with minor corrections.
- **2027 Sunsets: Sodium silicate (MJ).** The lead summarized the TR and review for sodium silicate. The TR was found to be comprehensive and sufficient. The group discussed the uses of sodium silicate and suggested minor edits. The lead will incorporate the suggestions and submit the final document for the Spring meeting. The CS Chair will convey to the NOP that the TR was found sufficient.
- **2027 Sunsets: Soap-based algicide/demossers (ADB).** The lead summarized the review for soap-based algicide, and noted that a previous Board voted to remove it. Based on public comment, indicating that this substance was still in use, it was not removed from the National List. The CS will submit the review for the Spring 2025 meeting.
- **2027 Sunsets: Soaps, insecticidal (ADB).** The lead summarized the review for insecticidal soaps, and there were no follow up questions. At its last review the Board voted to renew its listing. The CS will submit the review for the Spring meeting.
- **2027 Sunsets: Vitamin D3 (ADB).** The lead summarized the review for vitamin D3, highlighting the environmental issues, which she noted are minimal and less risky than other rodenticides. Members had no follow up questions, and the CS will submit the review for the Spring meeting.
- **2027 Sunsets: EPA List 4 Inerts (BC/NL).** The lead reminded folks that the NOP is considering a Fall 2024 recommendation from the Board about reviewing inerts, and while that is underway, they are faced with reviewing the current listing. The lead feels the best path forward would be to renew the listing as is, while rulemaking progresses. Members agreed with this approach and the CS will submit the document for the Spring meeting.
- **Research Priorities (BC).** The group discussed the suggested list of priorities for Crops, which was partly developed based on public comment. Possible research topics include organic seed, plastic use/PFAS, and fluorine. A member added two other topics: compost and the fate of contaminants in compost; and "fitness cost" of contamination on the microbial/fungal communities cultivated in compost making.
- **Additional items.** None.
- **The meeting was adjourned**

[Previous CS Notes](#)

Future call schedule (1st and 3rd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted)

December 17, 2024

2027 Sunsets: Arsenic (JD)

2027 Sunsets: Paper (WT)

2027 Sunsets: Strychnine (MJ)

Compostables discussion document (NL/MJ) - status update

January 7, 2025

2027 Sunsets: Sodium silicate (MJ). Discuss review and TR sufficiency

2027 Sunsets: Soap-based algicide/demosers (ADB)

2027 Sunsets: Soaps, insecticidal (ADB)

2027 Sunsets: Vitamin D3 (ADB)

2027 Sunsets: EPA List 4 Inerts (BC/NL)

Research Priorities (All) - due to MS by 1.9.25

January 21, 2025

2027 Sunsets: Aquatic plant extracts (NL)

2027 Sunsets: Potassium hypochlorite (FQ). Discuss review and TR sufficiency

2027 Sunsets: Sucrose octanoate esters (FQ). TR sufficiency

Pear Ester proposal - petitioned (FQ)

Compostables (NL/MJ) - discuss/vote

February 4, 2025

February 18, 2025

March 4, 2025

March 18, 2025

April 1, 2025

April 15, 2025

May 6, 2025

May 20, 2025

June 3, 2025

June 17, 2025

July 1, 2025

July 15, 2025

August 5, 2025

August 19, 2025

September 2, 2025

September 16, 2025

October 7, 2025

October 21, 2025

November 4, 2025

November 18, 2025

December 2, 2025

December 16, 2025

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Petitioned Substances

Substance	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Pear Ester add to 205.601	FQ	Proposal	Petition sent to CS 10.05.23. Petition suff/TR request due 12.04.23. Petition found sufficient/CS requested TR 11.21.23. Draft TR sent to CS 5.17.24. TR Suff due 7.16.24. TR found sufficient 7.2.24.	1.21.25	Spr 2025

Other Projects

Project	Contact	Notes*	Scheduled/ status	Target meeting
Compost - Compostables discussion document	MJ/NL	NOP memo sent to NOSB October 11, 2023 CS requested TR on compostables 9.17.24	11.19.24 12.17.24 1.21.25	Spr 2025
Research Priorities	BC	Spring 2025 list due to MS by January 9, 2025	1.7.25	Spr 2025
Biodegradable Biobased Mulch Film (BBMF)	TBD	Previous NOSB work (2012 – 2021) NOP memo sent to NOSB September 8, 2023. Crops will not work on this at this time. On hold.	9.19.23 10.3.23	TBD

2027 Sunset Review

TR Requests (June 2024), Summary (Spr 2025), Review (Fall 2025)

Substance	National List	Con tact	TR Request?	Notes*	Scheduled/ status	Target meeting
Potassium hypochlorite	205.601(a)(2)(iv)	FQ	Y Lmtd Scope	Sunset date: 04/22/2027 TR: 2011 TR (chlorine materials) 2019/Fall - Rec to ADD 03/23/2022 87 FR 16371 TR due early Nov 2024. TR sent to CS 11.12.24. TR suff due 1.11.25. TR found sufficient 11.19.24.	5.21.24 11.19.24 1.21.25	Summary: Spr 2025 Review: Fall 2025
Soap-based algicide/demosers	205.601(a)(7)	ADB	N	Sunset date: 03/15/2027 TAP: 1996 TR: 2015 (Soap-Based Algicide/Demosers) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	1.7.25	“ “
Ammonium carbonate	205.601(e)(1)	LP	N	Sunset date: 03/15/2027 TAP: 1995 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.3.24	“ “

Soaps, insecticidal	205.601(e)(8)	ADB	N	Sunset date: 03/15/2027 TAP: 1994 TR: 2020 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 1.7.25	" "
Sucrose octanoate esters	205.601(e)(10)	FQ	Y Lmt'd scope	Sunset date: 03/15/2027 TR: 2005 2018/Fall - Rec to REMOVE 02/28/2022 87 FR 10930 TR due early Dec 2024. TR sent to CS 12.18.24. Sufficiency due 2.16.25	1.21.25	" "
Vitamin D3	205.601(g)	ADB	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2011 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	1.7.25	" "
Aquatic plant extracts	205.601(j)(1)	NL	Y Lmt'd Scope	Sunset date: 03/15/2027 TAP: 2005 TR: 2006 TR: 2016 (Marine plants & algae) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due early October 2024. TR sent to CS 10.3.24. Suff due 12.2.24. TR found sufficient 11.19.24.	11.19.24 1.21.25	" "
Lignin sulfonate	205.601(j)(4)	LP	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2011 TR: 2020 (Lignins) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24	" "
Fatty alcohols (C6, C8, C10, and/or C12)	205.601(k)(2)	BC	N	Sunset date: 04/22/2027 TR: 2016 (C8, C10) 2019/Fall - Rec to ADD 03/23/2022 87 FR 16371	12.3.24	" "
Sodium silicate	205.601(l)	MJ	Y Lmt'd Scope	Sunset date: 03/15/2027 TAP: 1996 TR: 2011 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due late Nov 2024. Tr sent to CS 12.18.24. Sufficiency due 2.16.25. TR found sufficient 1.7.25.	1.7.25	" "

EPA List 4 Inerts	205.601(m)(1)	BC/ NL	N	Sunset date: 03/15/2027 TR: 2015 (Nonylphenol ethoxylates) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24 1.7.25	“ “
Paper – (o) Production aids. (2) Paper-based crop planting aids as defined in § 205.2 . Virgin or recycled paper without glossy paper or colored inks.	205.601(o)(2)	WT	N	Sunset date: 12/14/2027 TAP: 1995 (Newspaper, recycled paper) TR: 2006 (Newspaper, recycled paper) TR: 2017 (Newspaper, recycled paper) TR: 2019 (Paper-based crop planting aids) 2021/Spring - Rec to ADD 11/14/2022 87 FR 68021	5.21.24 12.3.24 12.17.24	“ “
Arsenic	205.602(b)	JD	N	Sunset date: 03/15/2027 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.3.24 12.17.24	“ “
Strychnine	205.602(i)	MJ	N	Sunset date: 03/15/2027 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	5.21.24 12.17.24	“ “

Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Jan 24, 2025	16 -20
NOP - Draft Spring 2025 NOSB meeting tentative agenda	Feb 7, 2025	~ 10
NOSB - Spring 2025 proposals due to NOP	Feb 13, 2025	~ 9
NOP - Post proposals	Mar 3, 2025	7.5
Public comment closes	Apr 2, 2025	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2025	3
Public comment webinars	Apr 22 & 24, 2025	1
Spring 2025 NOSB meeting - Tempe, AZ	Apr 29 - May 1, 2025	0
Final recommendations due	May 29, 2025	30 days post meeting

Fall 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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NOP - Publish FRN, Open public comment	~May 15, 2025	24
NOP - Draft Fall 2025 NOSB meeting agenda	Aug 8, 2025	~11
NOSB - Fall 2025 proposals due to NOP	Aug 20, 2025	~9
NOP - Post proposals	Sept 8, 2025	~8
Public comment closes	Oct 8, 2025	~4
NOP - Send compiled public comments to NOSB	Oct 14, 2025	~3
Public comment webinars	Oct 28 & 30, 2025	1
Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
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