

National Organic Standards Board (NOSB)

Tuesday, January 17, 2012

Crops Committee Minutes

2:00–3:00 pm ET

Present: John Foster (Chair), Barry Flamm, Jay Feldman, Colehour Bondera, Nick Maravell and Steve DeMuri

Absent: Tina Ellor (Vice-Chair)

New Members: Carmela Beck and Zea Sonabend

Staff: Lorraine Coke, Stacy Jones and Emily Brown-Rosen

Petitioned Substances					
Name	Contact	TR?	Vote Date	Notes	Meeting
Ferric Phosphate-snail bait (to remove)	Standards Division	Yes		TR sufficient for posting.	Spring 2012
Propyleneglycolmonolaurate (PGML)	TE	Yes		TR not sufficient; response rec'd 7/19. Removed from Fall meeting agenda. 2 nd draft of TR with CC.	Spring 2012
Oxidized lignite (humic acid)	TE	?		Review petition for sufficiency.	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Petition sufficiency review.	
1,1-Difluoroethane (inert)		Yes		Reviewing TR for sufficiency.	
Manganese sulfate monohydrate (inert)		Yes		On hold; waiting for TR	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Recommendations					
Name	Contact	TR?	Vote Date	Notes	Meeting
Mushroom standards	TE			Waiting to comment on rulemaking	
Food safety	JFo			On hold	

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production					
Name	Contact	TR?	Vote Date	Notes	Meeting

EPA List 3 - Inerts of Unknown Toxicity	JFe			Possible discussion document for Fall 2011; vote on listing Spring 2012.	Spring 2012
Phermones		Yes		Review TR for sufficiency. Response due by 11/21.	Spring 2012

Sunset 2013 - § 205.602 Nonsynthetic substances prohibited for use in organic crop production					
Name	Contact	TR?	Vote Date	Notes	Meeting

Agenda

- 1) review of materials report (approx. 8 materials for CC)
- 2) work plan?
- 3) Additional topics: Ferric phosphate – questions on the way to move forward – how does the CC want to proceed? Does the TR need a supplement? What about essentiality? Is OGC helping with this issue?

Discussion:

Would someone be able to draft some potential questions? – Jay will draft some questions by next week
 Review of materials on crops list – some items on hiatus (will these be prioritized?)
 Inerts working group – Zea (new 2012 member) will join this group, also a hope that the agenda will move forward with this working group (next meeting is January 26)
 Currently 3 materials on list that are inerts – will keep these on “hiatus” until more information on inerts working group is forthcoming

Prioritize:

Phermones TR – agree that it is sufficient? Can this be shared with new members? Discuss this on 31st.
 Oxidized lignite – TR sufficient?
 PGML – assigned to new contractor in October. Current status?

Other topics (not related to materials):

Mushroom standards – decided to wait until NOP issues rulemaking before the committee makes any recommendation and/or decision. This item is on hold.
 Food safety – on hold for now. This came up in committee discussion. The general thought is that the materials will be prioritized.
 Seed question – may need to do some follow-up on availability of organic seed. General concern that there has not been much progress on percentage of organic seed in use. There were a series of recommendations from previous Board committees on this topic.

Proposed Future Call Schedule:

January 31 – sufficiency determination on Oxidized lignite

February 7, 2012

February 21, 2012

Milestone	Deadline
Spring 2012 Agenda Finalized	Friday, March 23, 2012
Committee Proposals Due	Monday, April 2, 2012
Spring 2012 NOSB Meeting Albuquerque, New Mexico	May 21 – 24, 2012

Note: Committee minutes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official NOP policy or regulations.

National Organic Standards Board (NOSB)

Tuesday, January 31, 2012

Crops Committee Minutes

2:00–3:00 pm ET

Present: John Foster (JFo), Barry Flamm (BF), Jay Feldman (Chair)(JFe), Colehour Bondera (CoB), Nick Maravell (Vice Chair)(NM), Harold Austin (HA), Carmela Beck (CaB) and Zea Sonabend (ZS)

Absent: None

Staff: Lorraine Coke, Stacy Jones and Emily Brown-Rosen

Petitioned Substances - current status of review process					
Name	Contact	Tech Review(TR)	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		TR sufficient for posting.	Spring 2012?
Propyleneglycolmonolaurate (PGML)	?	Yes		TR Insufficient - Reassigned to new contractor on 10/27/11	
Oxidized lignite (humic acid)	ZS	?		Petition sent to CC on 7/1/2011; Review petition for sufficiency.	Fall 2012?
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Need Petition sufficiency review. On hold	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold.	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert, on hold.	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR?	Vote Date	Notes	Meeting

Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	
Organic seed	?			Possible discussion/update at spring meeting	

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production – current status of review process					
Name	Contact	TR?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe			Vote on listing Spring 2012.	Spring 2012
Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/2011; Review TR for sufficiency. Get sufficiency questions from committee.	Spring 2012

* Highlighted items need action by committee

Agenda

1. Welcome and introductions of committee members (10 mins)
2. Approve meeting agenda (3 mins)
3. Approve minutes of last meeting (Jan 17 meeting) (5 mins)
4. Webpage tool (3 mins)
5. Issues for May board meeting (20 mins)

In addition to those issues listed below in #6. with specific deadlines, other issues that have emerged as issues of importance including the following: food safety, mushroom standards, commercial availability, organic seed, post-harvest treatment guidance, tetracycline update, fire blight committee, revisit peracetic acid, others?)

6. Issue Assignment and Deadlines (15 mins)

List 3 inert ingredients (sunset)

List 4 inert ingredients (in coordination with Inerts Working Group)

Ferric Phosphate (petition)

Pheromones (TR sufficiency)

Oxidized Lignite (TR sufficiency)

PGML (petition)

Other issues

7. Next meeting (4 mins)

Discussion:

1. Introductions of committee members
 - Jay Feldman
 - John Foster

Nick Maravell
Barry Flamm
Colehour Bondera
Carmela Beck
Zea Sonnabend
Harold Austin

2, Approve meeting agenda

Reviewed and approved

3. Approve minutes of last meeting - Jan 17

Colehour motioned to approve, Barry seconded the motion. The meeting minutes were approved.

4. Webpage tool

The webpage that was set up on Beyond Pesticides will not be available for use because it is a FACA Board. The NOP is looking into other, similar options for sharing documents. This type of file sharing is helpful to keep track of documents and historical decisions. The committee members expressed their desire to find a substitute similar to this.

5. Issues for May board meeting

Sunset materials

Inerts

Ferric phosphate – petition that should be addressed

Pheromones – series of questions that had been circulating in committee, prior to this meeting

Oxidized lignite

Propylene glycol monolaurate (PGML) – disregard the old TR and wait for the new TR coming from contractor (should be available in the next couple weeks)

Other items – food safety, mushroom standards, commercial availability, organic seed, post-harvest treatment guidance, tetracycline update, fire blight committee, revisit peracetic acid annotation (Barry will consult further with Emily on this topic).

→ Should the committee review and assign these topics/issues to individuals? One item that could be removed from the list is: post-harvest treatment guidance. The NOP will issue draft guidance later this year.

→ Mushroom standards are also being reviewed/discussed at the NOP – a draft or forthcoming rule may be developed.

→ The fire blight committee will not be prepared because they are just starting research. Most of the work in the field will not be until late April or May. Will be important to look at different areas of the country and how they are using it. The fire blight committee does have representation from several areas of the country. The research (funding) is only for OR State Univ. There is a concern from NE and Midwest producers because they use streptomycin more often than tetracycline. Will a new TR be needed? Perhaps this should be delayed? It may be more appropriate to have this as a topic at the fall 2012 or spring 2013 meeting. Question about connection between fire blight committee and crops committee? Harold Austin is

current member, but is awaiting decision by NOP on whether it is a conflict of interest. Will he be able to share the work/progress of the fire blight update with the CC? Will the CC need to do additional research? For now, Harold will be point person.

→ Organic seed – the Board was asked to review this topic. The Board received a request from the Organic Seed Alliance for an hour to present an update at the NOSB meeting. Perhaps a shorter presentation at the spring meeting to provide an update?

→ Food safety – focus on Food Safety Modernization Act (FSMA) which may or may not be funded/implemented. There was some interaction with organic producers in the FSMA, but not clear how it will play out. One committee member suggested that here is a really good tool on www.familyfarmed.org that could be used for smaller producers. One opinion that there is no pressing need to put this as a high priority for the CC at this time. Not sure what the CC would do with this at this time. It is a potentially big issue.

→ Any further work on GMOs? This will be closely related to seed. Also, one of the committee members is developing a list of GMO issues that will be relevant to all committees. This is a framework that has issues that each committee will have to deal with. At this time it is not ready for the spring meeting. It could be on work plan for future meeting.

6. Issue Assignment and Deadlines

Sunset material – inerts (Jay)

New petitions: Biodegradable plastic mulch and Vinasse (sugar byproduct?)

Ferric phosphate – committee needs to decide if they will consider this, if so then there is a question on the ingredient EDTA. Any objections to try to move this as an agenda item? There would be a vote to prohibit ferric phosphate (as petitioned). Need a person to take the lead. Need to check timeline in terms of possible additional resources/materials that may be requested. There was a lot of back-and-forth from the petitioners. This is a complex issue that will take time to review and address.

Oxidized lignite – Zea

Ferric phosphate – Carmela & Zea

Tetracycline/Fire blight – Harold

Pheromones – Jay

PGML - Colehour

Proposed Future Call Schedule:

February 7, 2012 – sufficiency questions for Oxidized lignite, decide if Pheromone sufficiency questions are acceptable

February 21, 2012

March 6, 2012

March 20, 2012

Milestone	Deadline
Spring 2012 Agenda Finalized	Friday, March 23, 2012
Committee Proposals Due	Monday, April 2, 2012
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Absent: None

Staff: Lorraine Coke, Stacy Jones and Emily Brown Rosen

Petitioned Substances - Current status of review process					
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Propyleneglycolmonolaurate (PGML)	?	Yes		TR Insufficient - Reassigned to new contractor on 10/27/11	Spring 2012?
Oxidized lignite (humic acid)	ZS	?		Petition sent to CC on 7/1/2011; Review petition for sufficiency.	Fall 2012?
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Need to review TR for sufficiency. On hold.	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert, on hold.	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals

Name	Contact	TR?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	
Organic seed	?			Possible discussion/update at spring meeting	

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production – current status of review process					
Name	Contact	TR?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe			Draft proposal. Vote on listing Spring 2012.	Spring 2012
Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/2011; Review TR for sufficiency. Get sufficiency questions from committee.	Spring 2012

* Highlight indicates committee action needed.

Agenda

1. Approve meeting agenda (2 mins)
2. Approve minutes of last meeting (Jan 31 meeting) (3 mins)
3. Update on NOP creating a webpage tool (or something similar) for the committee. (3 mins)
4. Update on ferric phosphate - Carmela (10 mins)
5. Update on oxidized lignite - Zea (10 mins)
6. Clarification on peracetic acid - Barry (2 mins)
7. Review draft CC recommendation on List 3: discussion and alternative recommendations - Jay (20 mins)
8. Action Item: Agree on pheromone TR sufficiency questions. - Jay (5 minutes)
9. NOP staff update (5 mins)
10. Next meeting proposed agenda and actions List 3 inerts recommendation vote, draft recommendation for ferric phosphate, List 4 inerts draft policy recommendation, draft sufficiency questions for oxidized lignite (5 mins)

Discussion:

1. Approve meeting agenda
2. Approve minutes of last meeting (Jan 31 meeting) - Comment to add Jay's name to the inerts, then reviewed and approved
3. Update on NOP creating a webpage tool (or something similar) for the committee.
The NOP has looked into setting this up. CC members will be notified when it is up and running.

4. Update on ferric phosphate

Initial review has begun. It is a complex topic and there is a lot of information to review. This will be discussed at the next call.

5. Update on oxidized lignite

Initial review – question on whether it is necessary to review all the humic acid derived materials? Is it worth it to combine all these materials into one TR? → This may be a good use of resources (issue regarding Japan – Japan does not accept use of humic acids), and we do not have a recent review for synthetic humic acids, alkali extracted.

What is the process for expanding the scope of the TR? → Option to come back to committee with additional information and request TR for additional scope as well. Sometimes there may be more questions on the TR – the information that is wanted may not be out there (Materials Committee is working on policy for prioritizing research requests)

6. Clarification on peracetic acid

For 2012 sunset review, the committee left their 2009 recommendation standing, but also recommended to renew as listed while the annotation change is made separately. The 2009 proposal may not be workable because it is based on % of formulation rather than applications rates. Concept is that it should be a low concentration. Also do not want to adversely affect the use of hydrogen peroxide. There has been a lot of discussion on this over the years. Emily will review notes and summarize, then bring comments back to the committee.

7. Review draft CC recommendation on List 3 inerts: discussion and alternative recommendations

A draft rec was sent around to committee on list 3 inerts in passive pheromone dispensers. This must be voted on at the spring 2012 meeting. The current rule allows list 3 inerts only in pheromone traps. The EPA no longer uses the list method. The options presented in the Inerts Working Group discussion paper were reviewed, along with public comments that were received. Only a few list 3s believed to be in use, so one option is to review them individually. If the annotation needs to be changed, then the committee/Board will vote twice. Once to relist and once to change annotation.

Concern over recommendation – only two of the materials have been petitioned, and it might be a problem to propose listing new substances without a petition. Another option is to refer to the EPA listing at 180.1122 and limit to use in pheromone dispensers. It is noted EPA exempts all inerts from a residue tolerance in food, provided they are used in dispensers and do not contact crops or food, which is a food risk based approach, does not consider impacts on environment. It would be challenging to review individual inerts, since the use is not tied to specific active ingredients, hard to know the alternatives, lack of appropriate criteria for review, lack of disclosure, will take more time than available at sunset timeframe.

Another suggestion is to contact companies and ask about specific inerts and uses/formulations. Zea and Jay will work on modifying the proposal and bring a draft back to the committee.

8. Action Item: Agree on pheromone TR sufficiency questions

Why doing this, given the Board has already recommended 2012 sunset renewal for pheromones? The CC requested the TR in 2011, was not done in time, but is relevant for List 3 decision. If we send it back to ask more questions, then will the CC get it back in time? Because it is not finalized yet, it may be possible to get additional clarification. The questions will be circulated to the committee by email for feedback. The pheromone topic is a good example of how technology is changing very quickly. Don't want to do something that would prevent any future development.

Proposed Future Call Schedule:

February 21, 2012 – List 3 inerts recommendation review (new draft), discussion and vote, draft recommendation for ferric phosphate, List 4 inerts draft policy recommendation, draft sufficiency questions for oxidized lignite

March 6, 2012

March 20, 2012

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Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	

Organic seed	?			Possible discussion/update at spring meeting	
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Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe			Draft proposal. Vote on listing Spring 2012.	Spring 2012
Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/2011; Review TR for sufficiency. Get sufficiency questions from committee.	Spring 2012

* Highlight indicates committee action needed

Agenda

1. Approve Minutes (3 mins)
 2. Verify NOP's receipt of sufficiency questions for Pheromones TR (2 mins)
 3. Status of NOP webpage tool (5 mins)
 4. List 3 inerts - Sunset recommendation, discussion and vote (Jay/Zea) 15 mins.
 5. Ferric phosphate - draft recommendation discussion (Carmela) 15 mins
 6. Oxidized lignite - draft sufficiency questions for discussion (Zea) 5 mins
 7. Peracetic acid - update and possible strategy (Barry) 5 mins
 8. Other issues still working: 5 mins
- List 4 inerts draft policy recommendation (Jay/Zea)
- Organic Seeds - additional possible discussion issue for Spring board meeting
9. Next meeting assignments 5 mins

Discussion:

Approve Minutes from 2/7 call – reviewed and approved.

Verify NOP's receipt of sufficiency questions from committee for Pheromones TR

- Received? Ok to proceed?
- Emily confirmed that NOP received the questions.
- National List manager has them and should be getting the CC a response soon.

Status of NOP webpage tool

- everyone should have received an email to set password
- some preliminary files were set-up
- there are tools for check-in/check-out procedures, deleting previous versions
- has everyone checked-in? Jay will start uploading documents to test it out.
- Nick, Carmela, Barry, Emily, and John need to have passwords resent

List 3 inerts

- Chair sent draft proposal for discussion 205.601(m)(2) – currently, all list 3 inerts in passive dispenser products are allowed with pheromones
- 2 issues – list 3 has been dissolved by EPA and question of reviewing materials that fall into this category
- Info from inerts working group – believed to be only four List 3 substances used at present in pheromones in organic use.
- dual approach in draft proposal – intention to deal with List 3 inerts already petitioned for NOSB, and then secondly any List 3 materials not yet petitioned (newly petitioned)
 - first set intention for Board to have enough time to review and develop rule by December 2014 (it will remain listed until the NOP does rulemaking)
 - for the second tier there is an additional year added on to the timeline (until 2015) for review/proposals for newly petitioned materials
- important to talk about criteria that inerts will be reviewed on, but IWG will be working more on this

Questions:

- “provided that the national list rulemaking is concluded at this time” – this statement seems ambiguous
 - “newly petitioned chemicals in use” – if it is newly petitioned would it be in-use already? (beyond the 4 that are thought to be in use right now), so any chemical currently in use would have to submit a petition (material cannot be used unless it is in this listing)
 - how would a material reviewer review to these requirements? If they do not know the name, then how would they know if it is listed?
 - will have to go back to petitioners to see if they want to resubmit? Cannot react on petition that may not have support from producer/petitioner?
 - part A is very long – cannot expect certifier to test volatility of products
 - expiration dates: need adjusting?
 - separate definitions from annotation
 - if stating a list of materials permitted in the rule, cannot vaguely refer to list of materials (should the materials be explicitly listed?)
- This topic will be discussed further, and Inerts working group will look at this language.

Ferric phosphate

- rough draft with timeline and general background was sent to committee
- current proposal is to keep ferric phosphate on the list and have the inerts reviewed under the inerts process
- reasons for position/proposal
- conversation went off track to EDTA (ethylene diamine tetraacetic acid, claimed as inert ingredient)– need to focus on ferric phosphate as the material under review
- utilized TR, petitioner letter, info from National List manager, evaluation criteria, and comments from CC Chair
- why (during fall meeting) was ferric phosphate removed from NOSB agenda? – so much new information submitted right after TR was posted
- What does the term “active ingredient precursor” mean – referencing EDTA (came directly from patent)

Questions:

- the chemical identity is identical to form of EDTA? Sodium ferric hydroxyl EDTA – is it the same chemical identity as Ferric phosphate plus EDTA? Can EPA help with this?
- two petitioning companies make conflicting claims: – in reviewing this material trying to separate out ferric phosphate as a generic material (if other

ingredients not deemed appropriate, may need to reformulate product in future)

- there are other factors beyond “dietary exposure” measurement that EPA uses in assessing inerts – what else should the CC/NOSB be considering?
- Emily will ask EPA about “active ingredient precursor” and “chemical identity” (perhaps by ID number)
- possible to have draft of committee proposal by next meeting? Checklist? Is it appropriate to add an addendum to checklist with more narrative?

Oxidized lignite

- from information given, it is unclear what to do next
- sufficiency review date for petition has passed – what are next steps in this process? These are dates established following NOSB policy manual for review timeline.
- would make most sense to request TR for this (oxidized lignite) and alkali-extracted humic acids
- the oxidized lignite is extracting humic acid by using hydrogen peroxide (on national list), instead of alkali-extraction
- if it has to be on national list then question on synthetic /non-synthetic has to be decided
- may need new TR for humic acid derivatives, a complex subject.
- going to move forward and request TR for “humic acids, extracted with alkali or with hydrogen peroxide”

Peracetic acid (PAA)

- need to revisit previous Board work
- in 2008 had petition to review peracetic acid and remove annotations
- committee did not want to extend use, but wanted to continue to allow existing uses. New policy by EPA will require that PAA be declared as an active ingredient (not inert) in hydrogen peroxide formulations, so NOSB recommended a limited allowance , 5% peracetic acid in hydrogen peroxide products. This has little bearing on effective application rates due to dilution rates on labels. A stronger concentrate containing 12% PAA is diluted to application rates of 120 ppm max, while a 2% solution may be diluted and applied at 200 ppm.
- Chlorine is only other material with a ppm limitation (this limit was not set by NOSB, is a reference to Safe Drinking Water Act)
- the 2009 recommendation has not been implemented by NOP yet. NOSB did also renew as is for sunset 2013 purposes.
- suggestion for new write-up, discuss further next meeting.

Other issues

Update on the Organic Tree Fruit Working Group (submitted by email, after the CC call):

- 1) Yeast material for fire blight has received its federal registration. The registrant thinks that they will have enough material available for commercial use this spring to treat 2,000 acres.
- 2) One concern coming from last years trials is that there is some concerns that this material under certain application conditions could russet the fruit. Thus, making it not marketable for the fresh market.
- 3) Working group reaching out across the country to those stakeholders using either oxytet or strep to look at their issues, concerns, or use needs.
- 4) Also working with the Tree Fruit and Nursery Industry to look at rootstocks, blight resistant strains of fruit, and other possible alternatives. Trying to see about availability, as well as viability.
- 5) Ken Johnson (part of Group) hosting a webinar on March 13th at 2:00 P.M. - 3:15 P.M. EST. Fire Blight Control in Organic Pome Fruit Systems Under the Proposed Non-Antibiotic Standard. This is hosted by Oregon State University and open to all organic farmers across the country.

6) David Granatstein (working group) is hosting the International Organic Fruit Research Symposium at Leavenworth, Washington on June 18 -21. Hopefully, there will be some information and ideas on blight control options coming out of this meeting, as well.

7) The TF Working Group is trying to look at the "entire realm" of possibilities and options for alternative methods of controlling fire blight, as the NOSB at the Seattle meeting asked them to do. This will not be a fast process, but it is as least now moving forward with some controls in place and a goal in mind.

Proposed Future Call Schedule:

March 6, 2012 – review/discuss (and vote?) proposal on Ferric phosphate (draft to CC before call), review/discuss (and vote?) proposal on List 3 inerts (draft to CC before call), review proposal for Peracetic acid and discuss

March 20, 2012 – list 4 inerts(?), organic seeds

April 3, 2012

April 17, 2012

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Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Needs review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	
List 4 Inerts	JFe	?		?	

Other Proposals					
Name	Contact	TR?	Vote Date	Notes	Meeting

Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	
Organic seed	?			Possible discussion/update at spring meeting	

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe			Draft proposal. Vote on listing Spring 2012.	Spring 2012
Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/2011; CC reviewed TR for sufficiency. Sufficiency questions from committee sent to Lisa B on 3/6/12.	Spring 2012

* Highlight indicates committee action needed

Agenda

1. Approve Minutes (3 mins)
2. List 3 inerts (vote)
3. List 4 inerts (discuss for vote at next meeting)
4. Ferric Phosphate (discuss for vote at next meeting)
5. Peracetic acid
6. Update on other issues

Discussion:

Review & approve minutes – approved.

List 3 inerts

At end of last meeting – asked NOP to clarify how putting in expiration dates on specific List 3 inerts would affect them? Response from NOP on approach?

Feedback – on the draft proposed expiration dates (for 2 groups), pending rule-making – NOP cannot commit to these dates b/c don't have total control over publication dates of rules. NOP has to justify if doing something that is not the same as the recommendation.

What about language of “within 6 months to a year of publishing final rule” – this could be acceptable for program.

Is this structured such that the only these three materials are allowed? What happens if this amendment is not able to be completed in time for sunset?

Then the original annotation would stay as is, similar to other sunset materials.

Other concerns:

Deadlines are always tough b/c cannot control rule-making timeline

Procedurally you are listing specific materials that have not been previously listed before (they were considered as allowed as part of List 3 category), but these materials have not been individually reviewed. Three inerts have been petitioned, and there is one TR on BHT done in the past. The NOSB

decided in 2003 not to list individual List 3 inerts, but to focus on restrictions in use, ie. passive pheromone traps.
Why not just keep it the way it is, then review the specific inerts previously petitioned, then go through normal process? You could make recommendation to get people to update petitions and then go through normal review process..
CC members believe that the draft approach is a means to notify manufacturers so they will submit petitions for anything not listed.

What are the next steps?

Feeling that CC needs a solid sunset date – may have to vote on this in committee to determine.

Suggestion is made to remove names of inerts and place in narrative.

Previously petitioned and unpetitioned? (need mechanism for unpetitioned materials)

Why not have one deadline for all? Put 2015 for both?

Want petitioners to get involved (will need additional information)

May be difficult to review every inert – not enough information known on these.

Concern over whether this will lead the CC and the NOSB to focus too much on review of specific inert materials, but also trying to balance the NOSB's responsibility to review materials. Will this set a precedent that the NOSB review ALL inerts in the future? Some discussion of a new broad proposal for amending List 4 allowance.

Reviewing each of these materials is going to be difficult – not a lot of information on these materials out there.

A “screen” is helpful, one was included in NOSB recommendation from April 2010, to try to categorize and determine safety/use for these materials.

It is noted that it is difficult to make change on the current List 3 annotation for sunset 2013 without having resolution on the wider issue of List 4 inerts, for this reason a new proposal on List 4 was sent around. The Inerts Working Group is continuing to meet, and has not made a recommendation on this topic yet. ZS will revise the draft List 3 proposal based on the discussion.

Ferric phosphate

The draft proposal suggests addressing issue of inerts with IWG and continue with listing of ferric phosphate

Motion – as drafted should be reconsidered because current listing is double negative, could read: “motion to remove ferric phosphate” and then vote.

What is answer for a substitute? Also, necessary for organic production? How are these being evaluated?

The TR stated that there was an “all natural” product, but not available at commercial level. Aside from removing the pests manually, there are little alternatives.

This is a petition to remove a product that was already listed. Checklist will be revised based on discussion and resent.

PGML

Colehour will send update by email.

Proposed Future Call Schedule:

March 20, 2012 – Vote on Ferric Phosphate, List 3 inerts , Peracetic acid , list 4 inerts,

April 3, 2012 Discus PGML, Bioplastic petition , organic seeds

April 17, 2012 – review comments if available

Milestone	Deadline
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Spring 2012 Agenda Finalized	Friday, March 23, 2012
Committee Proposals Due	Monday, April 2, 2012
Spring 2012 NOSB Meeting Albuquerque, New Mexico	May 21 – 24, 2012

Note: Committee 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)
Tuesday, March 20, 2012
Crops Committee Minutes
2:00–3:00 pm ET

Present: Barry Flamm (BF), Jay Feldman (Chair JFe), Colehour Bondera (CoB), Nick Maravell (Vice Chair, NM), Harold Austin (HA), Carmela Beck (CaB) and Zea Sonnabend (ZS), John Foster (JFo),

Absent: none

Staff: Lorraine Coke, Michelle Arsenault, Stacy Jones King, Emily Brown Rosen, and Miles McEvoy

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		TR sufficient for posting.	Fall 2012
Propyleneglycolmonolaurate (PGML)	CoB	Yes		New TR sent to CC 2-13-12 Review petition for sufficiency, Review TR for sufficiency.	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CC on 7/1/2011; Requested TR on 3/6/12.	Fall 2012?
Biodegradable Plastic Mulch	CaB & ZS			Petition sent to CC on 2/23. Review petition for sufficiency, determine if need TR	Fall 2012?
Polyoxin D Zinc Salt, 2012	?			Petition sent to CC on 3/19. Review petition for sufficiency, determine if need TR	Fall 2012?
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Needs review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Note: Committee 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.

List 4 Inerts	JFe	?		Under consideration by Inerts Working Group	
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Other Proposals					
Name	Contact	TR?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	
Organic seed	?			Possible discussion/update at spring meeting	Spring 2012?

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe		3/20/12	Draft proposal . Vote on listing Spring 2012.	Spring 2012
Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/2011; CC reviewed TR for sufficiency. Sufficiency questions from committee sent to Lisa B on 3/6/12.	Spring 2012

* Highlight indicates committee action needed

Agenda

- Approve minutes (4 mins)
- Discuss and vote on ferric phosphate (17 mins - discuss, 3 mins vote)
- Discuss and vote on List 3 inerts (17 mins - discuss, 3 mins vote)
- Discuss list List 4 inerts (8 mins)
- Discuss GMO and seed purity (8 mins)

Discussion

1. Approve Minutes

Reviewed and approved.

Note: Committee 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.

2. Discuss and vote on ferric phosphate

There are two different proposed checklists, should they be merged? NOP staff- there should be one checklist presented as position, but the minority opinion needs to be presented as a separate appendix . A lot of NOSB members have been asking to have a narrative section added to the checklist so that there is more information presented than just the checklist. LC had sent a template around. See the NOSB Policy Manual on page 22 that describes procedure for a minority opinion. We can have an attached document to the checklist with an alternate opinion. If a small group feels that the checklist doesn't present what they want, their minority opinion can be voted on as well. JF, on the Handling Committee, we wanted to put a narrative sheet to serve two functions(much like on a recommendation) attached to the checklist to better flush out some of the details and not be restricted to the checklist, and if there were differing opinions in the discussion, they can be presented. It doesn't have to be a "minority opinion". Hopefully you could fully express the discussion going on. Possibly bring this to the Policy Committee, to make it clear to the public.

How to resolve the differences between the two checklists. Divergence based on consideration of an inert. NOP – does not see how a proposal to remove a substance can be based on an inert ingredient, when the petition was to remove Ferric Phosphate from the National List. .One member sees a duty to review total product, sees impact from the combination and focus needed where the material is used and its potential interactions. However, that's not what the petition is for, it's not for EDTA (which is a list 4, and currently allowed in pesticide formulations). NOSB asked EPA whether EDTA should be considered inert. EPA has registered EDTA as active and an inert, in the case of the original petitioner, EPA accepted the registrants claim that it is inert ("other"). NOP – since EDTA is not being petitioned , NOSB should limit their proposal limited to what the petition is for. Might be possible to suggest new annotation for ferric phosphate.

Discussion clarifying the voting process. Committee need to make a motion to remove, a vote against would keep it on the National List.

Motion to remove ferric phosphate.

Another motion suggested to amend current annotation for ferric phosphate. With the additional language "formulated without EDTA"–

One member objects to the motion, feels there is not enough review of EDTA, does not find that it is so harmful.

NOP – the CC may need an update to the Tech Review, this is an older TR and there has been additional information submitted by commenters. NOP should be able to get it done by the fall board meeting.

General consensus if we can postpone and seek better information, we should, but with a definitive deadline in mind., Committee could request an update on Ferric phosphate with particular question about combinations using EDTA.. NOP is trialing a project with the Agricultural Research Service to have them review TRs to ensure they are technically sound and accurate, so we could do that with this TR.

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Member agrees to withdraw the motion and bring this to the Board in the Fall. Several express need to issue a statement to be issued on what we are actually doing with this material so the public knows it hasn't fallen off the radar, "Ferric Phosphate is being deferred because we are undertaking further review...."

NOP will check with contractors, possible ARS review and report back to committee.

3. Discuss and vote on List 3 inerts

The draft proposal has two votes, one on the annotation, one on relisting. JFe moves that we amend the list 3 annotation in 205.601m to be replaced as indicated on page 5. Nick seconded. Discussion: there is an alternative recommendation, with suggested change is to leave one date in for list 3 – 2015, to be superseded by an overall inerts policy that will be put in place by 2015. – after which they would have to be reviewed individually if there is no policy. –JFe willing to go with that as a compromise, withdraws original motion..

Discussion regarding the importance of dealing with all inerts, within the next two years we can bring these 3 materials used as List 3 under review. At this point we are not talking about list 4 but it must be dealt with eventually.

A new motion is made by Zea:

205.601 Synthetic substances allowed for use in organic crop production.

(m) As synthetic ~~inert~~ *other* ingredients *not* asclassified by the Environmental Protection Agency (EPA) *as active ingredients*, for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances.

2) Inert ingredients *exempt from the requirement of a tolerance under 40 CFR 180.1122 that were formerly on EPA List 3 in passive polymeric dispenser products may be used until December 31, 2015, after which point* they are subject to individual review under 205.601, unless already covered by a policy adopted by the NOP for all other inert ingredients.

JFe seconded the motion. Vote: All in favor (8-yes).

JFe makes new motion to adopt definition of passive polymeric dispenser. Zea seconded the motion. Vote; all in favor (8-yes).

Zea motioned to relist as is for sunset backup. Jay (?) seconded. Vote: all in favor (8-yes).

Zea will email the final proposal to all.

Other items:

- Send comments on GMO and seed purity to Zea, discuss at next ad hoc GMO committee meeting, they will present at the full board meeting.

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PAA (Peracetic acid) is off the agenda, the committee is not going to reopen their earlier review.

- CC needs to consider TR requests for polyoxin zinc (fungicide) and Biodegradable Plastic mulch – for next call in order to have time for contractor before the fall meeting.

Proposed Future Call Schedule:

April 3, 2012 Discuss GMO and seed purity , Discuss PGML, Bioplastic petition , organic seeds

April 17, 2012 – review comments if available

May 1, 2012 – TBD

May 15, 2012 - TBD

Milestone	Deadline
Spring 2012 Agenda Finalized	Friday, March 23, 2012
Committee Proposals Due	Monday, April 2, 2012
Spring 2012 NOSB Meeting Albuquerque, New Mexico	May 21 – 24, 2012

Note: Committee 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 Committee Meeting Notes
Tuesday April 3, 2012 2:00 pm EDT**

Present: Barry Flamm (BF), Jay Feldman (Chair) (JFe), Colehour Bondera (CoB), Harold Austin (HA), and Zea Sonnabend (ZS), John Foster (JFo),

Absent: Nick Maravell (Vice Chair) (NM), Carmela Beck (CaB)

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

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		TR sufficient for posting.	Fall 2012
Propyleneglycolmonolaurate (PGML)	CoB	Yes		New TR sent to CC 2-13-12 Review petition for sufficiency, Review TR for sufficiency.	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CC on 7/1/2011; Requested TR on 3/6/12.	Fall 2012?
Biodegradable Plastic Mulch	CaB & ZS			Petition sent to CC on 2/23. Review petition for sufficiency, determine if need TR. Request for TR 4/4/12	Fall 2012?
Polyoxin D Zinc Salt, 2012	HA	Yes		Petition sent to CC on 3/19. Review petition for sufficiency, determine if need TR. Request for TR 4/3/12	Fall 2012?
Vinasse	NM			Petition sent to CC on 3/29. Review petition for sufficiency. Response Due Date: May 30, 2012	
Sulfuric acid	JFo			Petition sent to CC 4/2/12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Needs review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to	

				continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	
List 4 Inerts	JFe	?		Under consideration by Inerts Working Group	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	
Organic seed	?			Possible discussion/update at spring meeting	Spring 2012?

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe		3/20/12	Draft proposal. Vote on listing Spring 2012.	Spring 2012
Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/11; CC reviewed TR for sufficiency. Sufficiency questions from committee sent to Lisa B on 3/6/12. <u>Revised</u> TR for sent to CC 3/27/12. TR accepted 4/9/12	Fall 2012?

* Highlight indicates committee action needed

Agenda

1. Approve agenda
2. Approve notes from March 20
3. Agree on process going forward for Polyoxin D Zinc Salt and assign to CC member
4. Timeline for Biodegradable Plastic Mulch review
5. Update on Ferric Phosphate
6. Assign to Crops Committee (CC) member petition for sulfuric acid, for pH adjustment of anaerobically digested manure
7. Update on seed purity and GMO
8. Organic seeds - define issue
9. Getting connected to SharePoint - our CC password-protected website
10. Set agenda for next meeting and other business

Discussion

1. Agenda for this meeting approved

2. Approved notes from March 20, with one minor correction to the vote on Inerts (seconded by ZS).

3. Polyoxin D Zinc Salt assigned to HA

To make a determination on synthetic vs. non synthetic, we would have to have access to manufacturing info which is claimed as confidential business information (CBI). Many organic manufacturers choose to waive the confidentiality, but in this case they chose to keep it confidential. Committee is now relying on TR to get info, as the TR contractor will have access to the CBI. CC may have to rely on TR info, but CC has the right to not accept the TR as acceptable, or reject a petition if not enough information is provided in order to classify the material. NOP has already determined that the material is synthetic, but manufacturer disagrees. CC wants to move TR forward regardless.

4. Timeline for Biodegradable Plastic Mulch review

ZS and CaB are reviewing this. Would like to have it ready for fall meeting but it depends on the TR review. Any TRs should be in hand by mid- July in order to make any recommendations for fall.

5. Update on Ferric Phosphate

The CC will request supplemental information to the existing TR, in order to review at the fall meeting.

6. Sulfuric acid (for pH adjustment of anaerobically digested manure) assigned to JFo. Got new petition for sulfuric acid, and CC should review the existing TR from 2006 to determine if a new TR is needed. This substance was petitioned for a similar use (pH adjustment of liquid manure) in 2005 but the petition was withdrawn before full board vote. .

7. Update on seed purity and GMO

GMO ad-hoc committee withdrew a discussion document for spring meeting in an effort to get more info. This will be mentioned at meeting as a future work item. (ZS would like to have a discussion doc for fall meeting, so perhaps CC can talk about it on next call? Issue is pertinent to CC.

8. Organic seeds

Background: topic of organic seeds has been on workplan for a long time, due to public concern about inconsistent implementation of requirements for use of organic seeds. . NOP published draft guidance on seed and planting stock last July, final version is in process. BF was on CC in 2008 and indicated that this was a big issue (lack of organic seed) and there has been some movement in the community. It's a good time for the CC to take up this issue again. Discussion regarding possible presentation on a CC call by a representative from Organic Seed Alliance. JFe will call and schedule

9. Getting connected to SharePoint

Pilot site has been underutilized and chair feels that the committee should be using it. Members need to contact NOP office (Stacy) to get new passwords. MA will check with Stacy to see if passwords expire. This might be good place to post comments for spring meeting materials so people can view them in once place. CC would like to pilot Sharepoint on a trial basis. CoB will test with PGML document.

10. April agenda will include reviewing public comments if available. Other future business; PGML review, bioplastics review, GMO and organic seed discussion document.

Future Call Schedule:

April 17, 2012 – review comments if available

May 1, 2012 – TBD

May 15, 2012 - TBD

Milestone	Deadline
Public Comment Period	April 9 - May 3, 2012
Informal prep meeting	May 21, 7pm (in Albuquerque)
Spring 2012 NOSB Meeting	May 22 – 25, 2012

Note: Committee 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 Committee Meeting Notes
Tuesday April 17, 2012 2:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Colehour Bondera (CoB), Harold Austin (HA), and Zea Sonnabend (ZS), John Foster (JFo), Carmela Beck (CaB), Nick Maravell (Vice Chair) (NM)

Absent: Barry Flamm (BF)

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

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		TR sufficient for posting.	Fall 2012
Propyleneglycolmonolaurate (PGML)	CoB	Yes		New TR sent to CC 2-13-12 Review petition for sufficiency, Review TR for sufficiency. TR accepted 4/17/12	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CC on 7/1/2011; Requested TR on 3/6/12.	Fall 2012
Biodegradable Plastic Mulch	CaB & ZS			Petition sent to CC on 2/23. Review petition for sufficiency, determine if need TR. Request for TR 4/4/12	Fall 2012
Polyoxin D Zinc Salt, 2012	HA	Yes		Petition sent to CC on 3/19. Review petition for sufficiency, determine if need TR. Request for TR 4/3/12	Spring 2013
Vinasse	NM			Petition sent to CC on 3/29. Review petition for sufficiency. Response Due Date: May 30, 2012	Spring 2013
Sulfuric acid	JFo			Petition sent to CC 4/2/12. Petition Sufficiency Review (including TR Request, if applicable) due 6/4/12	Spring 2013

Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Needs review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	
List 4 Inerts	JFe	?		Under consideration by Inerts Working Group	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	
Organic seed	?			Possible discussion/update at spring meeting	Spring 2012?

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe		3/20/12	Proposal. Vote on listing Spring 2012.	Spring 2012

Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/11; CC reviewed TR for sufficiency. Sufficiency questions from committee sent to Lisa B on 3/6/12. <u>Revised</u> TR for sent to CC 3/27/12. TR accepted 4/9/12	Fall 2012?
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* Highlight indicates committee action needed

Agenda

- Approve agenda
- Approve notes from April 3, 2012
- PGML (Colehour) Action: Determine TR sufficiency
- Tutorial: Getting connected to SharePoint - our CC password-protected website
- Set agenda for next meeting and other business

Discussion

- April 17th agenda approved with no additions or changes
- April 3 minutes approved pending review by NOP (MM).
- Discussed PGML. PGML is a petroleum product. A member asked if there are alternatives for this. Will send note to NOP (LBrines) accepting TR as sufficient. Committee members asked if it was possible to request an abbreviated TR. Could this be a two step process 1) determine whether the substance fits into an OFPA category of permitted synthetics, and is compatible with organic production, and if so then 2) answer the rest of the questions. Follow up with Policy committee? NOP suggested sharing this with the Materials committee. The NOP does not reject a petition based on lack of identified OFPA category of synthetic substances (sulfur, fish, minerals, soap, etc); that decision is left to the discretion of the Committee.
- Tutorial: Getting connected to SharePoint – The CC password-protected website: many members need usernames and passwords so committee will discuss during next meeting. In need of usernames and passwords: NM, ZS, CaB, JFo
- The committee set agenda for next meeting
- No other new business
- Adjourned

Future Call Schedule:

May 1, 2012 – Tutorial: Getting connected to SharePoint, future work plan for GMO issues.

May 15, 2012 – Review public comments

Milestone	Deadline
Public Comment Period	April 9 - May 3, 2012
Informal prep meeting	May 21, 7pm (in Albuquerque)
Spring 2012 NOSB Meeting	May 22 – 25, 2012

Note: Committee 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 Committee Meeting Notes
Tuesday May 1, 2012 2:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Colehour Bondera (CoB), Zea Sonnabend (ZS), John Foster (JFo), Carmela Beck (CaB), Nick Maravell (Vice Chair) (NM), Barry Flamm (BF)

Absent: Harold Austin (HA)

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

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		Request for Add'l technical info sent to contractor on 4/27/12	Fall 2012?
Propyleneglycolmonolaurate (PGML)	CoB	Yes		New TR sent to CC 2-13-12 Review petition for sufficiency, Review TR for sufficiency. TR accepted 4/17/12	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CC on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12)	Fall 2012
Biodegradable Plastic Mulch	CaB & ZS			Petition sent to CC on 2/23. Review petition for sufficiency, determine if need TR. Request for TR 4/4/12 (expected August 2012)	Fall 2012
Polyoxin D Zinc Salt, 2012	HA	Yes		Petition sent to CC on 3/19. Review petition for sufficiency, determine if need TR. Request for TR 4/3/12 (TR in development)	Spring 2013
Vinasse	NM			Petition sent to CC on 3/29. Review petition for sufficiency. Response Due Date: May 30, 2012	Spring 2013

Sulfuric acid	JFo			Petition sent to CC 4/2/12. Petition Sufficiency Review (including TR Request, if applicable) due 6/4/12	Spring 2013
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Needs review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	
List 4 Inerts	JFe	?		Under consideration by Inerts Working Group	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold	
Organic seed	?			Possible discussion/update at spring meeting	Spring 2012?

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe		3/20/12	Proposal. Vote on listing Spring 2012.	Spring 2012

Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/11; CC reviewed TR for sufficiency. Sufficiency questions from committee sent to Lisa B on 3/6/12. <u>Revised</u> TR for sent to CC 3/27/12. TR accepted 4/9/12	Fall 2012?
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* Highlight indicates committee action needed

Agenda

- Approve agenda
- Approve minutes from 04 17 12
- Status of Requested TRs (projected completion dates): Ferric Phosphate-snail bait, Oxidized lignite (humic acid), Biodegradable Plastic Mulch; Polyoxin D Zinc Salt
- Can NOP staff give us a timing update?
- Update on petition sufficiency reviews (projected completion dates): Vinasse (NM), Sulfuric acid (JFo)
- Petition review (timing?): PGML (CBo)
- Public Comments on Inerts
- Developing Workplan for Summer/Fall 2012 (Issues):
 - GMO issues (ZS):
 - GMOs in Plant Breeding
 - Seed contamination from mixing
 - Seed contamination from pollen
 - Buffers and isolation distances
 - Direct GMOs in soil inputs (i.e. soymeal for fertilizer)
 - Residual GMOs in inputs (i.e. manure from Bst cows)
 - Direct GMOs in foliar inputs (i.e. Bt that is micro encapsulated)
 - Indirect GMOs in foliar inputs (soy oil as carrier in formulations)
 - Residual GMOs in foliar inputs (compost or manure tea)
- Rotenone to 205.602 as a prohibited natural (ZS)
- List 3 inerts review (JF/ZS)
- TR & Petition reviews

- Antibiotics (Streptomycin and Tetracycline)
- Other
- Check-in on SharePoint
- Set agenda for next meeting and other business

Discussion

- Approved agenda
- Approved minutes from 4 17 12
- Status of Requested TRs (projected completion dates): Ferric Phosphate-snail bait (sent to contractor-will let board know when it will be ready), Oxidized lignite (humic acid) (due in late June), Biodegradable Plastic Mulch (due in early August); Polyoxin D Zinc Salt (due late June).
- Update on Vinasse – byproduct. Petition states that it is classified by OMRI as synthetic. Determination of synth/non first? Petitioned for use as a fertilizer in crops. If it is synthetic, should committee move petition forward for a TR? Committee chose to table this conversation until next meeting so others can read it. JFo will work on Sulfuric acid this week
- Petition review (timing?): PGML will be put on fall workplan, and could be done soon.
- Public comments on Inerts – 37 general comments on inerts. Awaiting more.
- Work plan for Summer/Fall 2012 (Issues):
 - GMO issues (ZS): designed to be longterm work plan. Some items are based on OMRI decision tree and were included as examples of how complex the issue is. There are other more pressing, short term issues that the committees can put on work plans for fall 2012 and spring 2013
 - Would like to move seed purity/plant breeding forward as discussion doc for spring
 - Other items seem more like long term projects. How does committee solicit public input for items along the way or should we wait until things are more solidified within the committees.
 - Put on workplan to schedule a speaker from Seed Community
 - Seed contamination from mixing
 - Seed contamination from pollen
 - Buffers and isolation distances
 - Direct GMOs in soil inputs (i.e. soymeal for fertilizer)
 - Residual GMOs in inputs (i.e. manure from Bst cows)
 - Direct GMOs in foliar inputs (i.e. Bt that is micro encapsulated)
 - Indirect GMOs in foliar inputs (soy oil as carrier in formulations)
 - Residual GMOs in foliar inputs (compost or manure tea)
- Rotenone to 205.602 as a prohibited natural (ZS) - off market in US, so perhaps Committee should list it as a prohibited natural without a formal petition. Will write recommendation to list it. No TR needed. No objections are expected.

- List 3 inerts review (JF/ZS). TR & petition reviews – A member asked if the inerts working group would finish before summer so this item can be put on the fall agenda. Should committee expect any other petitions or TRs?
- Antibiotics (Streptomycin and Tetracycline) - pending TRs? Should there be overlap of committees for Aquaculture? NOP is open to collaboration between committees on this issue. Do CC members have thoughts on joint committees? GMO Ad-hoc committee seems to be working well, but some of the early joint committees didn't work well because guidance was vague and it was not clear how decisions would be made. Another ad hoc committee is not advisable, so perhaps it's best to leave aquaculture with the Livestock committee (LS) and then have other committee members weigh in, and ultimately vote as a full board member. Will be on agenda for next EC. ZS will miss next EC call.
- Other – petition forthcoming for carbon monoxide for rodent control
- SharePoint – Most people have been able to get on, but there are a few people still having issues.
- Set agenda for next meeting and other business. Planned topics: Workplan, sulfur dioxide petition sufficiency PGML discussion and vote, review public comments. Next steps for Vinasse - (Petition? Get TR? Don't need TR?). NM will write a synopsis to guide discussion on next call.

Future Call Schedule:

May 15, 2012 – 2:00 EDT. Planned topics: Workplan, Petition Sulfuric Acid, petition sufficiency PGML discussion and vote, review public comments

Milestone	Deadline
Public Comment Period	April 9 - May 3, 2012
Informal prep meeting	May 21, 7pm (in Albuquerque)
Spring 2012 NOSB Meeting	May 22 – 25, 2012

Note: Committee 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 Committee Meeting Notes
Tuesday May 15, 2012 2:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Colehour Bondera (CoB), Zea Sonnabend (ZS), John Foster (JFo), Carmela Beck (CaB), Barry Flamm (BF), Harold Austin (HA), Nick Maravell (Vice Chair) (NM)

Absent: none

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK), Emily Brown Rosen (EBR)

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		Request for Add'l technical info sent to contractor on 4/27/12	Fall 2012?
Propyleneglycolmonolaurate (PGML)	CoB	Yes		New TR sent to CC 2-13-12. TR accepted 4/17/12	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CC on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12)	Fall 2012
Biodegradable Plastic Mulch	CaB & ZS			Petition sent to CC on 2/23.. Request for TR 4/4/12 (expected August 2012)	Fall 2012
Polyoxin D Zinc Salt, 2012	HA	Yes		Petition sent to CC on 3/19. Request for TR 4/3/12 (TR in development)	Spring 2013
Vinasse	NM			Petition sent to CC on 3/29. Review petition for sufficiency. Response Due Date: May 30, 2012	Spring 2013
Sulfuric acid	JFo			Petition sent to CC 4/2/12. Petition Sufficiency Review (including TR Request, if applicable) due 6/4/12	Spring 2013
Inert Ingredients					

Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Needs review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	
List 4 Inerts	JFe	?		Under consideration by Inerts Working Group	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold- update from WG at fall 2013 meeting	Fall 2013
Organic seed	?				

Sunset 2013 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
EPA List 3 - Inerts of Unknown Toxicity	JFe		3/20/12	Proposal. Vote on listing Spring 2012.	Spring 2012
Pheromones	JFe	Yes		Pheromones TR sent to CC on 9/19/11; <u>Revised</u> TR for sent to CC 3/27/12. TR accepted 4/9/12	

* Highlight indicates committee action needed

Agenda

- Approve agenda
- Minutes Update
- Public Comments and NOP position on CC List 3 sunset recommendation on upcoming NOSB meeting agenda (25 mins)
- Reminder: Quick Status Reminder of Requested TRs (projected completion dates): Ferric Phosphate-snail bait, Oxidized lignite (humic acid), Biodegradable Plastic Mulch; Polyoxin D Zinc Salt
- Update on petition sufficiency and TRs or need for TRs reviews
 - Sulfuric acid (JFo)
 - Vinasse (NM)
- Schedule recommendation on PGML (CBo)
- Work Plan check-in: Anything new?
- Check-in on SharePoint
- Set agenda for next meeting and other business

Discussion

- Agenda approved
- Minutes from May 1 not ready for approval. NOP just sent them.
- Public Comments and NOP position on CC List 3 sunset recommendation on upcoming NOSB meeting agenda (25 mins) - NOP does not support this proposal because of the expiration dates that are proposed. This would be extremely complex to manage, and NOP would also like to wait to get the report back from the Inerts working group. List 3 no longer exists and was a catch-all category that EPA used. The proposal also sets a precedent for individual review of all inerts, before the Inerts Working Group has presented a final proposal. The committee asked if NOP responded to the NOSB recommendation from May 2010 on inerts that stated all inerts should be individually reviewed. The NOP did respond in September 2010 that they had concerns about this approach, EBR will send that forward to committee. If NOSB passes this recommendation as it stands, could NOP postpone response?
- Reminder: Quick status reminder of requested TRs (projected completion dates): Ferric Phosphate-snail bait, Oxidized lignite (humic acid), Biodegradable Plastic Mulch; Polyoxin D Zinc Salt
 - updated by SJK. All info is in workplan table
- Update on petition sufficiency and TRs or need for TRs reviews

- Sulfuric acid (JFo). History: Petitioned, TR was requested, and then petitioner withdrew petition, so it was not pursued. If Committee moves forward they feel they should list sulfuric acid and annotate for limited use. Perhaps this would be best addressed with a two stage process; Is another TR, or updated TR necessary?
- Vinasse (NM) – NM reviewed checklist and found nothing helpful in making initial assessment about whether or not this is synthetic.
- Schedule recommendation on PGML (CBo) – after NOSB meeting
- Work Plan check-in: Anything new? – Chair asked that members look over the workplan and bring ideas to NOSB meeting.
- Check-in on SharePoint
- Set agenda for next meeting and other business – after NOSB meeting

Future Call Schedule:

June 5, 2012 2:00 EDT

Milestone	Deadline
Public Comment Period	April 9 - May 3, 2012
Informal prep meeting	May 21, 7pm (in Albuquerque)
Spring 2012 NOSB Meeting	May 22 – 25, 2012

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 Meeting Notes
Tuesday June 5, 2012 2:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Colehour Bondera (CoB), Zea Sonnabend (ZS), Carmela Beck (CaB), Barry Flamm (BF), Harold Austin (HA), Nick Maravell (Vice Chair) (NM)

Absent: John Foster (JFo)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK), Emily Brown Rosen (EBR)

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		Request for Add'l technical info sent to contractor on 4/27/12	Fall 2012
Propyleneglycolmonolaurate (PGML)	CoB	Yes		New TR sent to CC 2-13-12. TR accepted 4/17/12	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CC on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12) Draft TR sent to ARS for review 6-5-12.	Fall 2012
Biodegradable Plastic Mulch	CaB & ZS	Yes		Petition sent to CC on 2/23. Request for TR 4/4/12 (expected August 2012)	Fall 2012
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CC on 3/19. Request for TR 4/3/12 (TR in development)	Spring 2013
Vinasse	NM			Petition sent to CC on 3/29. Review petition for sufficiency. Response Due Date: May 30, 2012	Spring 2013
Sulfuric acid (Stabilize digested poultry manure)	JFo			Petition sent to CC 4/2/12. Committee deemed sufficient, barring JFo disagreement.	Spring 2013?

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Rotenone (For 602)	ZS	no		Proposal to list on 205.602, as prohibited	Fall 2012
Aquaculture-CO2	CBo, ZS			Petition sent to CC on 5-30-12.	Fall 2012/ Spring 2013
Aquaculture-Chlorine.	CBo, ZS (?)			Petition sent to CC on 5-30-12.	TBD
Carbon monoxide (exhaust gas) Add to section 205.601				Petition sent to CC on 06 06 12. Petition Sufficiency Response due 08 06 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Needs review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold- update from WG at fall 2013 meeting	Fall 2013
Organic seed	ZS or JF?			Possible update from Org Seed Alliance on org seed database at fall mtg 15 min	Fall 2012
GMO - seed purity				With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Fall 2012

EPA List 3 & 4 - Inerts	JFe			Under consideration by Inerts Working Group	Fall 2012
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Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting

* Highlight indicates committee action needed

Agenda

1. Approve Agenda
2. Approve Minutes
3. Vote on petition sufficiency for sulfuric acid
4. Take Vinasse off workplan until Materials Classification policy issued?
5. Take antibiotics (Strep and Tetracycline) off workplan since there is no petition?
6. Approve workplan and set dates.
7. Set agenda for next meeting.

Discussion

1. Agenda approved
2. Approved Minutes from May 1 and May 15th with no changes.
3. Vote on petition sufficiency for sulfuric acid. A question was asked about whether or not the Subcommittee needed another TR since there was a recent one. It was determined that it was not necessary as a recent TR had been completed and NOSB voted to prohibit it (Sulfuric Acid). The Subcommittee tentatively accepted the petition as sufficient and will send note to Lisa Brines accepting petition.
4. Take Vinasse off workplan until the Materials Classification policy is issued? Unclear as to whether or not committee needs a TR before making the synthetic/nonsynthetic determination? How should committee respond to petitioner? Could ask more questions or move forward with knowledge that there are other materials that are ahead of this one in the workplan. Subcommittee suggested that NOP let the petitioner know that review will be delayed pending guidance on classification of materials. Potentially there are synthetics added that are not on the NL that would rule this product out. If there are added materials the committee asked whether or not they would be able to evaluate without a TR?

Is a truncated TR possible? NOP indicated it is but the committee should check with LBrines. Petitioner is seeking to have this classified as non-synthetic. Decided to approve petition as sufficient and move to determine if TR is necessary later. On workplan for spring 2013.

5. Take antibiotics (Strep and Tetracycline) off workplan since there is no petition? WG liaison reports that a petition for Oxytetracycline will be forwarded to committee in next week. EBR indicated that there is not time to get a TR before fall meeting, (though perhaps one will not be needed) and there may be time constraints to complete rule writing by Oct 2014 if a change in expiration date is proposed. HA will take lead on this and update group.

6. Approve workplan and set dates. JFe was going to liaison with the Livestock committee for aquaculture, but perhaps JFo would instead? Need to add Rotenone (ZS) to workplan. A member asked about adding organic seed to the workplan. Will ask this during the EC call.

7. Set agenda for next meeting. June 19: CBo and ZS will take Aquaculture-CO₂ and Aquaculture-Chlorine.

Future Call Schedule:

June 19, 2012 2:00 EDT

1. CO₂ for aquaculture – petition sufficiency review, - CBo and ZS
2. Chlorine for aquaculture –petition sufficiency review – CBo and ZS (?)
3. PGML – discuss, vote if possible- CBo

July 3, 2012 2:00 EDT (FYI-day before holiday)

1. PGML vote if needed
2. Sulfuric acid – petition sufficiency , request for TR if needed JFo

July 17, 2012 EDT

- 1) Review Ferric Phosphate if avail -CaB and ZS
- 2) Review oxidized lignite if available – ZS
- 3) Rotenone proposal - ZS

August 7. 2012

1. Vote Ferric phosphate
2. Review Biodegradable Plastic Mulch TR , if available CaB and ZS
3. Review Inerts WG proposal, if available
4. GMO seed purity discussion paper

Possibly: schedule a meeting for week of Aug 14 if needed?

August 21 2012

1. Vote on sulfuric acid, if no TR needed (for spring 2013)

Sept. 4 2012

1. Polyoxin D Zinc – discuss for spring 2013

Sept 18, 2012

- 1) Review comments

October 2

- 1) Review comments

Milestone	Deadline
NOP - "Finalize" agenda	August 13, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	~August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

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 Meeting Notes
Tuesday June 19, 2012 2:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Colehour Bondera (CoB), Zea Sonnabend (ZS), Carmela Beck (CaB), Barry Flamm (BF), Harold Austin (HA), Nick Maravell (Vice Chair) (NM), John Foster (JFo)

Absent:

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CaB & ZS	Yes		Request for Add'l technical info sent to contractor on 4/27/12	fall 2012
Propyleneglycolmonolaurate (PGML) -proposal	CoB	Yes		New TR sent to CC 2-13-12. TR accepted 4/17/12.	fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CC on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12.	fall 2012
Biodegradable Plastic Mulch	CaB & ZS	Yes		Petition sent to CC on 2/23. Request for TR 4/4/12 (expected August 2012)	fall 2012
Rotenone (For 602)	ZS	No		Proposal to list on 205.602, as prohibited	fall 2012
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CC on 3/19. Request for TR 4/3/12 (TR in development- Expected mid-July)	spring 2013
Vinasse	NM			Petition sent to CC on 3/29. Send request for modified TR to Lisa Brines.	spring 2013
Sulfuric acid (Stabilize digested poultry manure)-proposal	JFo			Petition sent to CC 4/2/12. Subcommittee deemed sufficient 6/5/12	spring 2013? Or fall 2012

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Tetracycline Petition		No		Sent to CC on 6/19/11; Needs petition sufficiency review.	spring 2013
Aquaculture-CO ₂	CBo, ZS			Petition sent to CC on 5-30-12. Determine whether TR is needed	fall 2012/ spring 2013
Aquaculture-Chlorine.	CBo, ZS (?)	No		Petition sent to CC on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Carbon monoxide (exhaust gas) Add to section 205.601				Petition sent to CC on 06 06 12. Petition Sufficiency Response due 08 06 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CC on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CC may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight	HA			On hold- update from WG at fall 2012 meeting	fall 2012?
Organic seed	ZS or JF?			Possible update from Org Seed Alliance on org seed database at fall mtg	fall 2012

GMO - seed purity				With GMO ad hoc subcommittee	fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	fall 2012
EPA List 3 & 4 - Inerts	JFe			Under consideration by Inerts Working Group	fall 2012

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013.	

* Highlight indicates committee action needed

Agenda

- (2 min) Approve agenda
- (3 min) Approve June 5 minutes
- (15 min) Petition Item: PGML – discuss analysis of petition CBo
- (15 min) Petition Item: CO2 for aquaculture – petition sufficiency review, - CBo and ZS
- (15 min) Proposed Discussion Document in advance of streptomycin and oxytetracycline petition
- (10 min) Set Agenda for next meeting (July 3)
- Petition: Chlorine for aquaculture –petition sufficiency review – CBo and ZS (?)
- Petition: Sulfuric acid – petition sufficiency , request for TR if needed JFo
- Draft recommendation: Inerts

Discussion

Agenda approved

- Approved minutes from May 5th with minor change –Chair asked to keep antibiotics on workplan as pending for spring 2013 based on petition that was just received.
- Petition Item: PGML
 - Not finding merits that this should be added to the NL. The group discussed various topics with regard to PGML, such as whether or not it was synthetic, whether or not it contained soap, and whether or not it was essential for the community. A member asked that the issue of soap be addressed on the proposal checklist. The subcommittee feels that oils are moderately effective at controlling pests (mites) and only for a limited period of time. There are other methods, including cultural, physical, and

biological that should be tried first, and there was general consensus that Petroleum based product should not be allowed because the production process is toxic. The Chair encouraged members to email additional comments before voting on PGML during next call. CBo offered to do more research and circulate that to group. Vote is planned for next call.

- Petition Item: CO₂ for aquaculture – petition sufficiency review
 - CO₂ for use in production of algae. Only used in closed systems. A member noted that the document used the term “contained” and asked whether or not that was the same as “closed”. ZS disclosed that in 2005 she wrote a petition to reclassify CO₂ as nonsynthetic, but doesn’t see this as a conflict. She noted that the Aquaculture Working Group Chair incorrectly stated that the former petition (from CCOF) was acted upon by the NOSB, as it was not. ZS is not recommending a request for a TR but subcommittee needs to establish petition sufficiency. Members are asked to send comments via email and ZS will complete checklist.
- Proposed Discussion Document in advance of streptomycin and oxytetracycline petition (NOP sent petition today)
 - The subcommittee discussed the possibility of an update from the Tree Fruit Working Group (WG) and submission of a discussion document for the fall meeting, in an effort to solicit input from public. A member confirmed that according to the NOP workplan circulated during the last Executive call, the Tree Fruit WG is on the agenda. The Subcommittee discussed having a panel discussion at the spring 2013 meeting.
- Set Agenda for next meeting (July 3) – see below

Deferred to next meeting

- Petition: Chlorine for aquaculture –petition sufficiency review – (CBo and ZS) (?)
- Petition: Sulfuric acid – petition sufficiency , request for TR if needed (JFo)
- Draft recommendation: Inerts

Future Call Schedule:

Jun 19, 2012 2:00 EDT

- CO₂ for aquaculture – petition sufficiency review, - CBo and ZS
- Chlorine for aquaculture –petition sufficiency review – CBo and ZS - moved to Jul 3
- PGML – discuss, vote if possible- CBo

Jul 3, 2012 2:00 EDT (FYI-day before holiday) (BF, ZS away)

- PGML vote
- Sulfuric acid – petition sufficiency, request for TR if needed JFo
- CO₂ for aquaculture – petition sufficiency review, - CBo and ZS
- Chlorine for aquaculture –petition sufficiency review – CBo and ZS (?)

Jul 17, 2012 EDT

- Review Ferric Phosphate if avail -CaB and ZS
- Review oxidized lignite if available – ZS
- Rotenone proposal - ZS

Aug 7, 2012

- Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS
- Review Inerts WG proposal, if available
- GMO seed purity discussion paper

Possibly: schedule a meeting for week of Aug 14 if needed?

Aug 21, 2012

- Vote on sulfuric acid, if no TR needed (for spring 2013)

Sept 4, 2012

- Polyoxin D Zinc – discuss for spring 2013

Sept 18, 2012

- Review comments

Oct 2, 2012

- Review comments

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 13, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	~August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012

Fall 2012 NOSB Meeting – Providence, RI

October 15-18, 2012

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 3, 2012 2:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Colehour Bondera (CBo), Harold Austin (HA),

Absent: Nick Maravell (Vice Chair) (NM), Zea Sonnabend (ZS), Barry Flamm (BF), John Foster (JFo), Carmela Beck (CBe)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CBe & ZS	Yes		Request for Add'l technical info sent to contractor on 4/27/12. TR rcv'd and sent to ARS. May not be in by 17 th .	fall 2012
Propyleneglycolmonolaurate (PGML) -proposal	CBo	Yes		New TR sent to CS 2-13-12. TR accepted 4/17/12.	fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CS on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12. Received - LB is reviewing	fall 2012
Biodegradable Plastic Mulch	CBe & ZS	Yes		Petition sent to CS on 2/23. Request for TR 4/4/12 (expected July 2012). LB is reviewing and will send back to contractor for minor edits	fall 2012
Rotenone (For 602)	ZS	No		Proposal to list on 205.602, as prohibited	fall 2012
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12 (TR received - Will be low priority)	spring 2013
Vinasse	NM			Petition sent to CS on 3/29. Send request for modified TR to Lisa Brines.	spring 2013
Sulfuric acid (Stabilize digested poultry manure)-proposal	JFo			Petition sent to CS 4/2/12. Subcommittee deemed sufficient 6/5/12	spring 2013? Or fall 2012

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Tetracycline Petition	HA	No		Sent to CS on 6/19/11; Needs petition sufficiency review.	spring 2013
Aquaculture-CO ₂	CBo, ZS			Petition sent to CS on 5-30-12. Determine whether TR is needed	fall 2012/ spring 13?
Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Carbon monoxide (exhaust gas) Add to section 205.601				Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12	
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	

Fire blight	HA			On hold- update from WG at fall 2012 meeting	fall 2012?
Organic seed	ZS or JF?			Possible update from Org Seed Alliance on org seed database at fall mtg	fall 2012
GMO - seed purity				With GMO ad hoc subcommittee	fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	fall 2012
EPA List 3 & 4 - Inerts	JFe			Under consideration by Inerts Working Group	fall 2012?

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	

* Yellow highlight indicates committee action needed

Agenda

- (2 min) Approve agenda
- (3 min) Approve June 19 minutes
- (10 min) PGML vote (recap and vote) CBo
- (15 min) Sulfuric acid – petition sufficiency, request for TR if needed JFo
- (5 min) CO2 for aquaculture – petition sufficiency review, - CBo and ZS
- (5 min) Chlorine for aquaculture –petition sufficiency review – CBo
- (10 min) Inerts Update (EBR?)
- (3 min) Ferric Phosphate –update on status of review (NOP)
- (7 min) Set Agenda for next meeting (July 17)
- Discussion Document on antibiotics in fruit production

Discussion

- Due to lack of quorum, group decided to have short discussion about antibiotics and fruit production, and then reconvene in two weeks.
- Discussion Document on antibiotics in fruit production.

- HA circulated a draft document to the members for review, and is seeking feedback from NOP about whether or not this will be on the fall 2012 meeting agenda. A member asked about the ramifications for the community. Subcommittee will continue to work on this and would like SJK to forward the document to the program. CBo had some comments and will email them to entire group. With regard to Tetracycline, HA will shepherd this if the program feels he does not have a COI, as he wrote a letter of support for the petition. The program has determined this that this does not constitute a COI.

Future Call Schedule:

Jun 19, 2012 2:00 EDT

- CO₂ for aquaculture – petition sufficiency review, - CBo and ZS
- Chlorine for aquaculture –petition sufficiency review – CBo and ZS - moved to Jul 3
- PGML – discuss, vote if possible- CBo –vote postponed

Jul 3, 2012 2:00 EDT (BF, ZS away)

- PGML vote - postponed
- Sulfuric acid – petition sufficiency, request for TR if needed JFo - postponed
- CO₂ for aquaculture – petition sufficiency review, - CBo and ZS - postponed
- Chlorine for aquaculture –petition sufficiency review – CBo and ZS (?) - postponed

Jul 17, 2012 EDT

- Review Ferric Phosphate if avail -CBe and ZS
- Review oxidized lignite if available – ZS
- Rotenone proposal - ZS

Aug 7, 2012

- Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS
- Review Inerts WG proposal, if available
- GMO seed purity discussion paper

Possibly: schedule a meeting for week of Aug 14 if needed?

Aug 21, 2012

- Vote on sulfuric acid, if no TR needed (for spring 2013)

Sept 4, 2012

- Polyoxin D Zinc – discuss for spring 2013

Sept 18, 2012

- Review comments

Oct 2, 2012

- Review comments

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 13, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	~August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

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 31, 2012 2:00 pm EDT draft**

Present: Jay Feldman (Chair) (JFe), Carmela Beck (CBe), Colehour Bondera (CBo), Harold Austin (HA), Zea Sonnabend (ZS), Barry Flamm (BF), John Foster (JFo),

Absent: Nick Maravell (Vice Chair) (NM)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK), Emily Brown Rosen (EBR)-sitting in

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CBe & ZS	Yes		Request for Add'l technical info sent to contractor on 4/27/12. Draft TR rcv'd and sent to ARS. Expect draft TR to be sent to CS the week of 7/30.	Fall 2012
Propyleneglycolmonolaurate (PGML) -proposal	CBo	Yes		New TR sent to CS 2-13-12. TR accepted 4/17/12. Voted on proposal: 07 17 12	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CS on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12. Draft TR sent to CS on 07/13	Fall 2012
Biodegradable Plastic Mulch	CBe & ZS	Yes		Petition sent to CS on 2/23. Request for TR 4/4/12 (expected July 2012). Expect to draft TR to be sent to CS the week of 7/30	Fall 2012
Rotenone (For 205.602)	ZS	No		Proposal to list on 205.602, as prohibited	Fall 2012
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13	Spring 2013
Vinasse	NM			Petition sent to CS on 3/29. Sent request for feedback on feasibility for modified TR to Lisa Brines.	Spring 2013

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Sulfuric acid (Stabilize digested poultry manure)-proposal	JFo			Petition sent to CS 4/2/12. Subcommittee deemed sufficient 6/5/12 pending JFo approval.	Spring 2013? Or Fall 2012
Antibiotics (Tetracycline) Petition	HA	No		Sent to CS on 6/19/11; Needs petition sufficiency review.	Spring 2013
Aquaculture-CO ₂	CBo, ZS			Petition sent to CS on 5-30-12. Determine whether TR is needed	Spring 2013?
Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Aquaculture-Micronutrients	?				
Carbon monoxide (exhaust gas) Add to section 205.601				Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12	
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold- update from WG at fall 2012 meeting Group is working on Discussion document? As per Workplan 060812 (MB and MM)	Fall 2012?
Organic seed?	ZS or JFo?			Possible update from Org Seed Alliance on org seed database at fall mtg.	Fall 2012?
GMO - seed purity				With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Spring 2012
EPA List 3 & 4 - Inerts	JFe			Under consideration by Inerts Working Group	Fall 2012?

Comment [MA1]: What is this item?

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	Fall 2013

* Yellow highlight indicates committee action needed

Agenda

- (2 min) Approve agenda
- (3 min) Approve June 19 and July 3 minutes
- (10 min) PGML vote (recap and vote) [CB]
- (10 min) Sulfuric acid – petition sufficiency, request for TR if needed [JFo]
- (5 min) Inerts Update – Draft Inerts Working Group worksheet attached [EBR, ZS, JFe]
- (5 min) Discussion Document on antibiotics in fruit production [HA & JFo]
- (10 min) TRs Sufficiency Determination
Oxidized lignite (humic acid) [ZS]

- Polyoxin D Zinc Salt [HA]
- (2 min) Rotenone: Requirements to move forward with NOSB consideration [ZS]
- (2 min) Vinasse: TR request (see email sent to Crops Subcommittee and Lisa Brines below) [NM]
- (3 min) Aquaculture:
 - a. CO2 for aquaculture – determine whether TR is needed. [CBe and ZS]
 - b. Chlorine for aquaculture –(i) petition sufficiency review, (ii) determine whether TR is needed. [CBo]
 - c. Lignin sulfonate (chelating agent for aquatic plants): (i) Identify lead, (ii) petition sufficiency review, (iii) determine whether TR is needed.
- (1 min) Petition for carbon monoxide (exhaust gas): Identify lead
- (1 min) Petition for Tetracycline: (i) Identify lead, (ii) petition sufficiency review, (iii) determine whether TR is needed.
- (3 min) Update on Status of requested TR's [SJ]: ferric phosphate [leads: CBe & ZS], Biodegradable Plastic Mulch [CBe & ZS]
- (3 min) Set Agenda for next meeting (July 31)

Discussion

- Minutes from June 19 and July 3 calls approved with no changes. An extra Crops call was added for July 31 2:00 pm EDT
- PGML - Acaricide; a pesticide that kills members of the Acari group – ticks and mites. Stated in the petition (p.5), specifically PGML is seen as, “a broad spectrum antimicrobial agent to control fungi and bacteria that cause decay of post-harvest fruit and vegetables.” The group discussed whether or not there were alternatives such as cultural practices, field sanitation or crop rotation (i.e. non chemical means). Although, if these methods are not effective then they are not alternatives. Look at efficacy of existing synthetics ?...

Vote:

(DFO note: NM voted via email on August 19, 2012)

Motion to classify PGML as synthetic as petitioned:

Motion made by: CBo

Seconded by: ZS

No additional discussion

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

Motion to add PGML to the National List § 205.601(e) as an acaricide

Motion made by: CBo

Seconded by: JFo

Yes: 2 No: 6 Abstain: 0 Absent: 0 Recuse: 0

ZS will add language to the summary of proposed action indicating that there is dissent, instead of writing a minority opinion. Will forward to HA for inclusion in the checklist. Chair will seek vote from NM.

- Update on sulfuric acid. Checklist is same as 2006 checklist, with a slightly different application. JFo will revise sections and send doc around to group. There was no support from previous Crops Subcommittee but various components of it have changed since then. JFe will forward an email to Lisa Brines indicating that the Crops subcommittee accepts the TR. Group feels that we do not need new TR.
- EBR updated Crops Subcommittee on the activities of the Inerts Working Group (IWG). The IWG has an outline for a plan to assess the commonly used inerts so they can group the ones that are chemically similar. This could possibly result in 7-8 groups. The IWG is hoping to set a cutoff date in 2015. Would like to have discussion document to Crops by no later than a week before proposal deadline of August 20. JFe asked if a week is enough time for Crops group to look at this disc document and recommendation (which will be procedural).
- Fireblight & Antibiotics discussion doc: JFe-will incorporate information from public and work related communications into discussion doc so the group can solicit public comment.
- TR Sufficiency Determination. Oxidized lignite (humic acid): ZS indicated that there are some lingering questions, but noted that a new TR will not answer the questions, so feels TR is generally sufficient. CS would like NOP to confirm whether any other substances were used in the manufacturing process for oxidized lignite. EBR will ask Lisa Brines to check on this in the CBI version of the petition.
- Polyoxin D Zinc Salt HA would like clarification from NOP but for now the group accepts the TR as sufficient. JFe will send info to group about health effects that were not included in TR. JFe asked that HA put recommendations in an email and send them to group.
- Rotenone: ZS asked if the group needed to petition to remove this from list. The chair requested that they have a conversation about this item about the path forward.

Meeting adjourned. Several items were not discussed due to time constraints.

Future Call Schedule:

Jul 3, 2012 2:00 EDT (BF, ZS away)

- PGML vote - postponed
- Sulfuric acid – petition sufficiency, request for TR if needed JFo - postponed
- CO₂ for aquaculture – petition sufficiency review, - CBo and ZS - postponed
- Chlorine for aquaculture –petition sufficiency review – CBo and ZS (?) - postponed

Jul 17, 2012 2:00 EDT

- Discuss sulfuric acid petition criteria checklist (JFo) TR accepted
- Review Ferric Phosphate if avail (CBe and ZS) –TR not returned yet
- Review oxidized lignite if available (ZS) - requested for more info from LBrines
- Rotenone proposal (ZS) - postponed
- Determination on moving forward on Vinasse TR (NM) -postponed
- PGML vote (CBo) -done

Jul 31, 2012 2:00 EDT

- Review Ferric Phosphate if avail (CBe and ZS) –TR not returned as of July 17
- Review oxidized lignite if available (ZS) continued
- Discuss/vote on Rotenone proposal (ZS)
- Vinasse: TR request (see email sent to Crops Subcommittee and Lisa Brines) (NM)
- Aquaculture-CO₂– determine whether TR is needed. [CBe and ZS]
- Aquaculture-Chlorine (i) petition sufficiency review, (ii) determine whether TR is needed. [CBo]
- Lignin sulfonate (chelating agent for aquatic plants): (i) Identify lead, (ii) petition sufficiency review, (iii) determine whether TR is needed. Petition for carbon monoxide (exhaust gas): Identify lead.
- Petition for Tetracycline: (i) Identify lead, (ii) petition sufficiency review, (iii) determine whether TR is needed.
- Update on Status of requested TR's [SJ]: ferric phosphate [leads: CBe & ZS], Biodegradable Plastic Mulch [CBe & ZS]

Aug 7, 2012 2:00 EDT

- Sulfuric acid – ?
- Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS

- Review Inerts WG proposal, if available
- GMO seed purity discussion paper

Possibly: schedule a meeting for week of Aug 14 if needed?

Aug 21, 2012 2:00 EDT

- Vote on sulfuric acid, if no new TR needed (for spring 2013)

Sept 4, 2012 2:00 EDT

- Polyoxin D Zinc – discuss for spring 2013

Sept 18, 2012 2:00 EDT

- Review comments

Oct 2, 2012 2:00 EDT

- Review comments

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	~August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday July 31, 2012 2:00 pm EDT **DRAFT****

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Barry Flamm (BF), John Foster (JFo), Colehour Bondera (CBo), Carmela Beck (CBe)

Absent: Nick Maravell (Vice Chair) (NM),

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Petitioned Substances – Current status of review process					
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Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CS on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12. Draft TR sent to CS on 07/13.	Fall 2012
Biodegradable Plastic Mulch	CBe & ZS	Yes		Petition sent to CS on 2/23. Request for TR 4/4/12 (expected July 2012). Expect to draft TR to be sent to CS the week of 7/30	Fall 2012
Rotenone (For 205.602)	ZS	No		Proposal to list on 205.602, as prohibited	Fall 2012
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13	Spring 2013
Vinasse	NM			Petition sent to CS on 3/29. Sent request for feedback on feasibility for modified TR to Lisa Brines.	Spring 2013

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Sulfuric acid (Stabilize digested poultry manure)-proposal	JFo			Petition sent to CS 4/2/12. Subcommittee deemed sufficient 6/5/12 pending JFo approval.	Spring 2013? Or Fall 2012
Antibiotics (Tetracycline) Petition	JR and ?	No		Sent to CS on 6/19/11; Needs petition sufficiency review.	Spring 2013
Aquaculture-CO ₂	CBo, ZS			Petition sent to CS on 5-30-12. Determine whether TR is needed	Spring 2013?
Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Aquaculture-Micronutrients	?				
Carbon monoxide (exhaust gas) Add to section 205.601	NM			Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12	
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	
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Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold- update from WG at fall 2012 meeting Group is working on Discussion document? As per Workplan 060812 (MB and MM)	Fall 2012?
Organic seed?	ZS or JFo?			Possible update from Org Seed Alliance on org seed database at fall mtg.	Fall 2012?
GMO - seed purity				With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Spring 2012
EPA List 3 & 4 - Inerts	JFe			Under consideration by Inerts Working Group	Fall 2012?

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	Fall 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve July 17 minutes
- Sulfuric acid – updated checklist
- Inerts Update – update on Inerts Working Group (IWG)
- Research Priorities – ideas for Research Priorities to send to Materials Subcommittee
- Discussion document on antibiotics in fruit production
- TRs Sufficiency Determination
- Oxidized lignite (humic acid): TR sufficient?
- Polyoxin D Zinc Salt
- Rotenone

- Thoughts on Ferric Phosphate supplemental TR; are we moving forward for the fall 2013 meeting?
- Vinasse: TR request
- Aquaculture:
 - a. CO2 for aquaculture – determine whether TR is needed after talking with AWG.
 - b. Chlorine for aquaculture –(i) petition sufficiency review, (ii) determine whether TR is needed.
 - c. Lignin sulfonate (chelating agent for aquatic plants): (i) petition sufficiency review, (ii) determine whether TR is needed.
- Petition for carbon monoxide (exhaust gas): Identify lead.
- Petition for Tetracycline: (i) Identify lead, (ii) petition sufficiency review, (iii) determine whether TR is needed.
- Update on Status of requested TR's: Any change in status:
- Biodegradable Plastic Mulch
- Set Agenda for next meeting (August 7)

Discussion

- Approved agenda
- Minutes from July 17th approved with minor modifications sent via email by JFe
- Sulfuric acid – Group discussed updated checklist. According to the petitioner, there are no harmful human effects, but petition did not supply a citation. A member asked why the entire checklist was not completed, and why there was no narrative. JFo indicated that Category 4 was not applicable, and that he would add the summary of proposed action. Chair asked that the group vote on this at next meeting.
- Inerts Update –IWG meeting has not occurred yet, so no new update.
- Research Priorities – ZS and JFe will work on list of items to send to Materials Subcommittee.
- Discussion document on antibiotics (tetracycline and streptomycin) for use in fireblight control in fruit production. JFe will edit and proof document. NOP asked the group to format the document similar to past recommendations. A member added that the document, in its current form, is not balanced, and asked that it be edited. Another member agreed and indicated that there was some missing history regarding decisions by the former Crops Subcommittee and feels it needs to be included. ZS also added that the number of questions should be limited, as having too many is not conducive to soliciting useful comments. Group would like to limit number of questions to less than 10, and narrow the scope. When asked by the chair if NOP is supportive of this agenda item, NOP responded yes.
- TRs Sufficiency Determination
 - Oxidized lignite (humic acid). The group asked if the CS would receive the information from NOP before proposal deadline. A member of the Subcommittee asked if NOP could look at the TR and confirm if there are or aren't any additives in the process, without disclosing CBI.
 - Polyoxin D Zinc Salt - JFe asked that HA craft a document that the CS will then send to NOP for review.

- Rotenone - Document was edited by CS chair and NOP. ZS requested a new copy of recommendation form for Rotenone, and will make some edits so Subcommittee can vote on this next week.
- Ferric Phosphate supplemental TR - CBe will prepare doc and bring to next meeting
- Vinasse: TR request- Crops Subcommittee requested follow up from NOP (Lisa Brines)
- Aquaculture:
 - a. CO2 for aquaculture: Group may request more info about petition update from aquaculture working group (AWG)
 - b. Chlorine for aquaculture: CBo feels TR is needed out of precedent. CBo's concerns involve the use of this in aquaculture because it is approved for use in soil, when aquaculture is a different system. JFe asked that CBo put some of this in writing. Group feels petition is fine, but requests a TR.
 - c. Lignin sulfonate (chelating agent for aquatic plants): didn't have time to discuss.
- Petition for carbon monoxide (exhaust gas): A member asked if this item should be considered. Chair would like NM to take lead on this.
- Petition for Antibiotics (Tetracycline): NOP asked that the group consider reassigning this to someone other than HA due to the potential appearance of a COI.

Future Call Schedule:

Jul 31, 2012 2:00 EDT

- Discuss Sulfuric Acid checklist
 - Review Ferric Phosphate if avail (CBe and ZS) –TR not returned as of July 17
 - Review oxidized lignite if available (ZS) continued
 - Discuss/vote on Rotenone proposal (ZS) – vote deferred to August 7th meeting
 - Vinasse: TR request (see email sent to Crops Subcommittee and Lisa Brines) (NM)
 - Aquaculture-CO2– determine whether TR is needed. [CBe and ZS]
 - Aquaculture-Chlorine (i) petition sufficiency review, (ii) determine whether TR is needed. [CBo]
 - Lignin sulfonate (chelating agent for aquatic plants): (i) Identify lead, (ii) petition sufficiency review, (iii) determine whether TR is needed.
Petition for carbon monoxide (exhaust gas): Identify lead.
 - Petition for Tetracycline: (i) Identify lead, (ii) petition sufficiency review, (iii) determine whether TR is needed.
- Update on Status of requested TR's [SJ]: ferric phosphate [leads: CBe & ZS], Biodegradable Plastic Mulch [CBe & ZS]

Aug 7, 2012 2:00 EDT

- Discuss/vote on Rotenone proposal (ZS) – vote deferred from August 7th meeting
- Vote on sulfuric acid
- Discuss/Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS
- Review Inerts WG proposal, if available
- GMO seed purity discussion paper

Schedule a meeting for week of Aug 14 if needed?

Aug 21, 2012 2:00 EDT

- Vote on sulfuric acid, if no new TR needed (for spring 2013)ul

Sept 4, 2012 2:00 EDT

- Polyoxin D Zinc – discuss for spring 2013

Sept 18, 2012 2:00 EDT

- Review comments

Oct 2, 2012 2:00 EDT

- Review comments

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	~August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012

Fall 2012 NOSB Meeting – Providence, RI

October 15-18, 2012

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday August 7, 2012 2:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Barry Flamm (BF), Colehour Bondera (CBo), Nick Maravell (Vice Chair) (NM)

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

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CBe & ZS	Yes		Request for Add'l technical info sent to contractor on 4/27/12. Draft TR rcv'd and sent to ARS. Expect draft TR to be sent to CS the week of 7/30. Received supp. TR and ARS response 7/26/12.	Fall 2012
Propyleneglycolmonolaurate (PGML) -proposal	CBo	Yes	07 17	New TR sent to CS 2-13-12. TR accepted 4/17/12.	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes		Petition sent to CS on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12. Draft TR sent to CS on 07/13. TR sufficiency sent 8/1/12	Fall 2012
Biodegradable Plastic Mulch	CBe & ZS	Yes		Petition sent to CS on 2/23. Request for TR 4/4/12 (expected July 2012). Expect draft TR to be sent to CS the week of 7/30. TR received 8/2/12.	Fall 2012
Rotenone (For 205.602)	ZS	No	08 07	Proposal to list on 205.602, as prohibited.	Fall 2012
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13. Add'l	Spring 2013

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
				questions sent from CS 8-15-12.	
Vinasse	NM			Petition sent to CS on 3/29. Sent request for feedback on feasibility for modified TR to LBrines.	Spring 2013
Sulfuric acid (Stabilize digested poultry manure)-proposal	JFo		08 07	Petition sent to CS 4/2/12. Subcommittee deemed sufficient 6/5/12.	Fall 2012
Antibiotics (Tetracycline) Petition Discussion doc	HA	No		Sent to CS on 6/19/11; Needs petition sufficiency review.	Fall 2012?
Aquaculture-CO ₂	CBo, ZS			Petition sent to CS on 5-30-12. Determine whether TR is needed	Spring 2013?
Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Aquaculture-Micronutrients	?				
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
Aquaculture- plant production Vitamins (B1, B12, H)				Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12	
Carbon monoxide (exhaust gas) Add to section 205.601				Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold- update from WG at fall 2012 meeting Group is working on Discussion document? As per Workplan 060812 (MB and MM)	Fall 2012?
Organic seed?	ZS or JFo?			Possible update from Org Seed Alliance on org seed database at fall mtg.	Fall 2012?
GMO - seed purity				With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Spring 2012
EPA List 3 & 4 - Inerts	JFe			Under consideration by Inerts Working Group	Fall 2012?

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	Fall 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve July 31 minutes

- Sulfuric acid – updated summary document and checklist; VOTE
- PGML-
- Rotenone: Checklist presentation review and discussion; possible VOTE
- Ferric Phosphate checklist presentation and review, including supplemental Technical Report (TR) and ARS document; possible VOTE
- Biodegradable Mulch: Checklist presentation review; possible VOTE
- Oxidized Lignite Checklist review, discussion view; determine whether it is going to be presented at Fall 2012 NOSB meeting
- Update on discussion document on antibiotics (tetracycline and streptomycin) in fruit production; vote at August 15 meeting
- Tetracycline petition: status check: (ii) petition sufficiency review, (iii) determine whether TR is needed.
- Research Priorities for Materials Subcommittee
- Additional TR questions on Polyoxin D Zinc Salt circulated prior to call
- Status check: update on Vinasse: TR request
- Status check: Petition for carbon monoxide (exhaust gas): (ii) determine whether TR is needed.
- Aquaculture: status check:
 - a. CO₂ for aquaculture – more discussion on need for TR; possible VOTE
 - b. Chlorine for aquaculture –(i) Petition sufficient?, (ii) determine whether TR is needed.
 - c. Lignin sulfonate (chelating agent for aquatic plants): (i) petition sufficiency review, (ii) determine whether TR is needed.
 - d. Micronutrients: (i) petition sufficiency review, (ii) determine whether TR is needed.
 - e. NOP: status of aquaculture guidance/policy?
- Circulate Agenda for extra meeting (Wednesday, August 15, 1:00pm EST)

Discussion

- Agenda approved with addition of PGML discussion, and oxidized lignite vote
- Minutes from July 31st meeting were not sent to subcommittee yet for approval

VOTE: Sulfuric acid

- Motion to classify sulfuric acid (205.605) as synthetic:
- Motion made by: CBo
- Seconded by: NM
- Additional discussion: motion to list as synthetic, not non synthetic
- Yes: 6 No: 0 Abstain: 0 Absent: 2 Recuse: 0

- Motion to list sulfuric acid for inclusion on 205.601(j) as petitioned for use to stabilize poultry manure
- Motion made by: HA
- Seconded by: BF
- No additional discussion
- Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

JFe will work further with JFo to do some minor edits.

- PGML-CBo added some minor language and recirculated to group in case there was further discussion. Chair asked that the entire group be copied on responses.
- Rotenone – incorporated comments from group and solicited input about citations. MA will ask EBR about botanicals review from 1994 that ZS referenced.

VOTE: Rotenone

- Motion to classify Rotenone as a natural substance.
- Motion by: HA
- Seconded: BF
- Yes: 6 No: 0 Abstain: 0 Absent: 2 Recuse: 0

- Motion to list on 205.602, as prohibited natural
- Motion made by: ZS
- Seconded by: BF
- No additional discussion
- Yes: 6 No: 0 Abstain: 0 Absent: 2 Recuse: 0

- Ferric Phosphate Checklist presentation and review. CBe had to miss call so group will postpone this discussion
- Biodegradable Plastic Mulch: Checklist presentation review – Group discussed whether or not this is prohibited in OFPA. NOSB can propose to change the regulations, but cannot change OFPA. A member noted that because this is biodegradable it is technically removed each year at the end of the season. CBo added that this argument doesn't hold up when you are talking about areas that have long, perhaps year-round, growing seasons. In such instances, plastic mulch will biodegrade and "go away" but it takes long periods of time. The group discussed the chemistry of the plastic and what happens to it when it eventually does biodegrade. It was noted that of greater concern is the amount of non-biodegradable plastic used in organic that is removed each year and sent to landfills. NM asked if

the NOP could answer whether adding bioplastics would be a violation of OFPA. SJK will confirm question with ZS and then solicit feedback from NOP.

- Oxidized Lignite Checklist review, discussion. A member of the subcommittee said that the TR seemed biased against Oxidized Lignite, as it focuses on burning coal. This petition is for a method of extracting humic acid and feels it belongs in the appropriate listing for humic acid on the National List. A member asked about amending an annotation and whether or not that would restart the sunset clock. The group discussed options, such as holding this over until the spring meeting. ZS feels the CS should move ahead with this vote, which is tentatively scheduled for August 15.
- Update on Discussion Document on antibiotics (tetracycline and streptomycin) in fruit production. Discussion doc was sent to members for review. SJK noted that the comments from NOP were not incorporated, and the chair asked that NOP add the comments again. HA expressed concern that the document took an unexpected direction, and the chair asked that the document be edited and recirculated. Chair noted that his initial intent was to provide alternate views in an effort to solicit useful public comment, which he felt would lead to a more balanced final document. This idea was supported by several other members. BF indicated that it might be better to lay out the history and all points of view, and felt that the current document was very polarizing. HA feels that these two items should not be lumped under one category of antibiotics, and urged the subcommittee to consider this as they proceed. It is unclear whether the CS will reach consensus on a final document in time for the fall 2012 meeting.
- ZS asked that JFe lead the Research Priorities conversation during the Materials subcommittee call Tuesday August 14 at 4:00.

Future Call Schedule:

Aug 7, 2012 2:00 EDT

- Discuss/vote on Rotenone proposal (ZS) – vote deferred from July 17th meeting
- Vote on sulfuric acid
- Discuss/Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS
- Review Inerts WG proposal, if available
- GMO seed purity discussion paper

Aug 15, 2012 1:00

The following items were not discussed on the August 7th call due to lack of time:

- Status check: Additional TR questions on Polyoxin D Zinc Salt circulated prior to call [HA]

- Status check: update on Vinasse: TR request [NM]
- Status check: Petition for carbon monoxide (exhaust gas): (ii) determine whether TR is needed. (NM)
- Aquaculture: status check:
 - a. CO₂ for aquaculture – more discussion on need for TR; possible VOTE [CBe and ZS]
 - b. Chlorine for aquaculture –(i) agreement that petition is sufficient?, (ii) determine whether TR is needed. [CBo]
 - c. Lignin sulfonate (chelating agent for aquatic plants): (i) petition sufficiency review, (ii) determine whether TR is needed.(JFo)
 - d. Micronutrients: (i)): (i) petition sufficiency review, (ii) determine whether TR is needed.(CBe)
 - e. NOP: status of aquaculture guidance/policy?
- Circulate Agenda for extra meeting (Wednesday, August 15, 1:00pm EST)

Aug 21, 2012 2:00 EDT

Sept 4, 2012 2:00 EDT

- Polyoxin D Zinc – discuss for spring 2013

Sept 18, 2012 2:00 EDT

- Review comments

Oct 2, 2012 2:00 EDT

- Review comments

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday August 15, 2012 1:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Barry Flamm (BF), Colehour Bondera (CBo), John Foster (JFo), Nick Maravell (Vice Chair) (NM)

Absent:

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK), Lisa Brines (LB)-sitting in

Work plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CBe & ZS	Yes	08 15 12	Request for Add'l technical info sent to contractor on 4/27/12. Draft TR rcv'd and sent to ARS. Expect draft TR to be sent to CS the week of 7/30. Received supp. TR and ARS response 7/26/12. TR accepted?	Fall 2012
Propyleneglycolmonolaurate (PGML) -proposal	CBo	Yes	07 17 12	New TR sent to CS 2-13-12. TR accepted 4/17/12.	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes	08 15 12	Petition sent to CS on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12. Draft TR sent to CS on 07/13. TR sufficiency sent 8/1/12	Fall 2012
Biodegradable Mulch Film Made From Bioplastics	CBe & ZS	Yes	08 15 12	Petition sent to CS on 2/23. Request for TR 4/4/12 (expected July 2012). Expect draft TR to be sent to CS the week of 7/30. TR received 8/2/12.	Fall 2012
Rotenone (For 205.602)	ZS	No	08 07 12	Proposal to list on 205.602, as prohibited.	Fall 2012

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13. Add'l questions sent from CS 8-15-12.	Spring 2013
Vinasse	NM			Petition sent to CS on 3/29. Sent request for feedback on feasibility for modified TR to LBrines.	Spring 2013
Sulfuric acid (Stabilize digested poultry manure)-proposal	JFo		08 07	Petition sent to CS 4/2/12. Subcommittee deemed sufficient 6/5/12	Fall 2012
Antibiotics (Tetracycline) Petition Discussion doc	JR and ?	No		Sent to CS on 6/19/11; Needs petition sufficiency review. TR deemed sufficient	Spring 2013
Aquaculture-CO ₂	CBo, ZS			Petition sent to CS on 5-30-12. Determine whether TR is needed	Spring 2013?
Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Aquaculture-Micronutrients	?				
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
Aquaculture- plant production Vitamins (B1, B12, H)				Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12	
Carbon monoxide (exhaust gas) Add to section 205.601				Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold- update from WG at fall 2012 meeting Group is working on Discussion document? As per Workplan 060812 (MB and MM)	Fall 2012?
Organic seed?	ZS or JFo?			Possible update from Org Seed Alliance on org seed database at fall mtg.	Fall 2012?
GMO - seed purity				With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Spring 2012
EPA List 3 & 4 - Inerts	JFe			Under consideration by Inerts Working Group	Fall 2012?

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process

Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	Fall 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve July 31 and August 7 minutes
- Ferric phosphate: PLEASE NOTE that an alternate view has been added to the document, and an additional checklist has been attached, with the proposal that they could be merged.
- Work Assignments, Action Items:
 - CBo: circulate to subcommittee draft final document and checklist on PGML with minority view included
 - JFo: nothing pending for this meeting
 - ZS: oxidized lignite draft review and VOTE; research priorities and VOTE; final Rotenone proposal distributions
 - HA: discuss document on tetracycline and streptomycin
 - NM: nothing pending for this meeting
 - CBe: biodegradable plastic mulch draft and VOTE; ferric phosphate draft review and VOTE
 - JFe: Inerts Working Group update and CS feedback (with ZS); alternate view on ferric phosphate incorporated into ferric phosphate checklist sent earlier and additional checklist.
 - BF: nothing pending for this meeting

Discussion

- Agenda approved with the addition of PGML discussion
- July 31 minutes approved with no changes. August 7 minutes approved with minor changes suggested by chair.
- PGML document with minority view included. A note about PGML being non-synthetic was added. A member asked that the document be retitled “checklist” instead of “petition”.
- Oxidized lignite draft review and VOTE. Removed word derivative from oxidized lignite draft document because it was confusing. Do not want reset clock so if board approves addition to list, they would like to add an expiration date.
 - VOTE: Oxidized Lignite (DFO note: Absent member cast vote via email August 19, 2012, which was added here)
 - Motion to classify oxidized lignite, humic acid hydrogen peroxide-extracted as synthetic
 - Motion made by: ZS
 - Seconded by: CBo
 - Additional discussion: none
 - Yes: 8 No: 0 Abstain: 0 Absent: Recuse: 0

Motion to list oxidized lignite humic acid hydrogen peroxide-extracted for inclusion on 205.601(j) as petitioned for use as a soil amendment.

Motion made by: ZS

Seconded by: JFo

Additional discussion: MB asked that the group be explicit for the regulation: motion to change listing 7 CFR 205(j)3 to humic acid to expire in 2017.

Yes: 3 No: 5 Abstain: 0 Absent: 0 Recuse: 0

- Discussion document on tetracycline and streptomycin-group decided that this document needed more work and is not ready to put forth for fall 2012 meeting.
- Group determined sufficiency on supplemental TR for Biodegradable Mulch Film Made from Bioplastics. Chair will notify NOP and Materials Subcommittee.
- Biodegradable Mulch Film Made from Bioplastics proposal draft was presented. The members discussed the inclusion of the nanotechnology language in the document when the NOSB already issued a recommendation on nanotechnology in October 2010 and determined that it should not be allowed in organic. NOP stated that inclusion of nanotech and reference to excluded methods would be inconsistent with other weed control materials and was unclear how these restrictions would be verified by certifying agents. A member added that their inclusion is redundant and unnecessary. A vote was then taken.

VOTE: (DFO note: Absent member cast vote via email August 19, 2012, which was added here)

- Motion to classify Biodegradable Mulch Film Made From Bioplastics (205.601) as synthetic:
- Motion made by: CBe
- Seconded by: JFe
- Additional discussion:
- Yes: 8 No: 0 Abstain: 0 Absent: 0 Recuse: 0

Motion to list Biodegradable Mulch Film Made From Bioplastics on 205.601(b)2 as petitioned

- Motion made by: CBe
- Seconded by: BF
- Additional discussion: Group discussed the substance name, as the TR discusses several others in addition to what is being petitioned. CBo asked about language clarification.
- Yes: 7 No: 0 Abstain: 1 Absent: 0 Recuse: 0

- Ferric phosphate: discussed TR questions/answers. Ferric phosphate is an inert ingredient, but there's a mixture of ingredients that form the active materials in the product being petitioned, and it's difficult to review one ingredient without the other (inert ingredients). FDA has listed EDTA as both inert and active. ZS added that the NOSB places generic materials on the list, and that the correct procedure is to leave ferric phosphate on list with annotation not to use EDTA, and then the NOSB has the option of rejecting the petition. ZS noted that she disagrees with previous Board's recommendation on this.

VOTE: Ferric phosphate (DFO note: Absent member cast vote via email August 19, 2012, which was added here)

- Motion to remove ferric phosphate from (205.601h)
 - Motion made by: CBe
 - Seconded by: JFe
 - Additional discussion: Group clarified what a yes vote or no vote would mean, since this is phrased differently than most substances up for vote: Yes would indicate removal, while a no vote would mean keeping ferric phosphate on list.
 - Yes: 3 No: 5 Abstain: 0 Absent: 0 Recuse: 0
- JFe: Inerts Working Group (IWG) update. ZS and JFe circulated a proposal for consideration by the Crops subcommittee. MB notified the group of NOP's comments on the proposal. Work has been ongoing and the IWG thought NOP was supportive, and are now concerned with the response from the Program. Chair asked for feedback from group about this. The intention is to have a CS proposal ready for the spring 2013 meeting. NOP noted that they are not trying to eliminate it from the fall agenda, but need to come to resolution on comments sent. The Chair asked that the Subcommittee members email questions in next couple of days, so the conversation can continue on the next conference call. NOP will set up a call with ZS and JFe this week to discuss the NOP's feedback.
 - Research Priorities Topics for Materials Subcommittee include copper sulfate, antibiotics, whole farms system research. The chair asked that if members had anything to add, to please send those via email by August 17th.

Future Call Schedule:

Aug 7, 2012 2:00 EDT

- Discuss/vote on Rotenone proposal (ZS) – vote deferred from July 17th meeting
- Vote on sulfuric acid
- Discuss/Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS
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Aug 15, 2012 1:00

The following items were not discussed on the August 7th call due to lack of time:

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- Status check: update on Vinasse: TR request [NM]
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Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Aquaculture-Micronutrients	?				
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
Aquaculture- plant production Vitamins (B1, B12, H)				Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12	
Carbon monoxide (exhaust gas) Add to section 205.601				Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold- update from WG at fall 2012 meeting Group is working on Discussion document? As per Workplan 060812 (MB and MM)	Fall 2012
Organic seed?	ZS or JFo?			Possible update from Org Seed Alliance on org seed database at fall mtg.	Fall 2012?
GMO - seed purity	ZS			With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Spring 2012
EPA List 3 & 4 - Inerts	JFe		08 21 12	Discussion document. Under consideration by Inerts Working Group	Fall 2012

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	Fall 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve August 15 minutes
- Vote on Policy and Procedure Proposal Other (“Inert”) Ingredients in Pesticide Formulations on the National List
- GMO Ad hoc Subcommittee Discussion Document on GMOs and Seed Purity [ZS]
- Spring 2013 Workplan Issues discussion [JFe]
- Tetracycline petition: status check: (ii) petition sufficiency review, (iii) determine whether TR is needed. [HA and ZS]
- Update on Vinasse: TR request [NM]
- Status check: Petition for carbon monoxide (exhaust gas): (ii) determine whether TR is needed. [NM]
- Aquaculture: status check:
 - a. CO2 for aquaculture – more discussion on need for TR; possible VOTE [CBe and ZS]
 - b. Chlorine for aquaculture –(i) agreement that petition is sufficient?, (ii) determine whether TR is needed. [CBo]
 - c. Lignin sulfonate (chelating agent for aquatic plants): (i) petition sufficiency review, (ii) determine whether TR is needed. [JFo]
 - d. Micronutrients: (i) petition sufficiency review, (ii) determine whether TR is needed.[CBe]
 - e. NOP: status of aquaculture guidance/policy?
- Agenda for next meeting (Tuesday, September 4, 2:00pm EST)

Discussion

- Agenda approved
- August 15 minutes have not been sent to Crops Subcommittee yet
- NOP updated the group about inerts, and discussed what the Board would be able to address in the given time period. The desired approach is to group inerts into categories, and then request TR by category. NOP concurs with Crops, who will vote on this discussion document.

- Vote on “Inert” Ingredients in Pesticide Formulations on the National List
 - Motion to adopt proposed Policy Recommendation and Procedure Proposal Review of Other (“Inert”) Ingredients in Pesticide Formulations on the National List
 - Motion made by: CBo
 - Seconded by: JFe
 - No additional discussion
 - Yes: 8 No: 0 Absent: 0 Abstain: 0 Recuse: 0

- The chair asked about the GMO ad hoc seed purity discussion document, and its potential outcome. ZS indicated that the document could address a seed purity standard. ZS indicated that it could be a joint effort between the Crops Subcommittee and the GMO ad hoc Subcommittee.

- Spring 2013 Workplan. The chair asked that the group think about workplan items so they can discuss them at the fall meeting. ZS noted that the Subcommittees need to be proactive and start thinking about sunset materials as well.

- Tetracycline petition: status check: The group agreed that they would like to request a TR.

- Update on Vinasse: NOP is awaiting more info about getting a modified TR. The group discussed whether or not it was feasible to spend resources if they are unsure about what they can do with the information. A question was raised about notifying the petitioner that there will be a delay.

- Status check: Petition for carbon monoxide (exhaust gas): JFe reminded NM that he assigned it to him while he was not present on a call.

- Aquaculture WG has requested to talk with Crops, although a member indicated that this might not be necessary. Also, NOP noted that it is not appropriate for a petitioner to participate on a Subcommittee call. Livestock subcommittee has invited Dr. Jim Tidwell of the University of KY to participate on Sept 4th call. JFe asked about having a joint call with Livestock and Crops as both groups are interested in learning more about this topic.
 - a. CO2 for aquaculture: Subcommittee is waiting for Working Group to revise petition, and will vote on this during the next meeting if wording in petition was changed.
 - b. Chlorine for aquaculture: Group indicated that TR is sufficient.

- The group discussed the Organic Seed Alliance presentation, and asked for suggestions about whom to invite. MB asked that the Subcommittee send her the names of potential presenters.

Future Call Schedule:

Aug 7, 2012 2:00 EDT

- Discuss/vote on Rotenone proposal (ZS) – vote deferred from July 17th meeting
- Vote on sulfuric acid
- Discuss/Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS
- Review Inerts WG proposal, if available
- GMO seed purity discussion paper

Aug 15, 2012 1:00

The following items were not discussed on the August 7th call due to lack of time:

- Status check: Additional TR questions on Polyoxin D Zinc Salt circulated prior to call [HA]
- Status check: update on Vinasse: TR request [NM]
- Status check: Petition for carbon monoxide (exhaust gas): (ii) determine whether TR is needed. (NM)
- Aquaculture: status check:
 - a. CO₂ for aquaculture – more discussion on need for TR; possible VOTE [CBe and ZS]
 - b. Chlorine for aquaculture –(i) agreement that petition is sufficient?, (ii) determine whether TR is needed. [CBo]
 - c. Lignin sulfonate (chelating agent for aquatic plants): (i) petition sufficiency review, (ii) determine whether TR is needed.(JFo)
 - d. Micronutrients: (i)): (i) petition sufficiency review, (ii) determine whether TR is needed.(CBe)
 - e. NOP: status of aquaculture guidance/policy?
- Circulate Agenda for extra meeting (Wednesday, August 15, 1:00pm EST)

Aug 21, 2012 2:00 EDT

Vote on (“Inert”) Ingredients in Pesticide Formulations on the National List

Sept 4, 2012 2:00 EDT

- Polyoxin D Zinc – discuss for spring 2013

Sept 18, 2012 2:00 EDT

- Review comments

Oct 2, 2012 2:00 EDT

- Review comments

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	~August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday September 4, 2012 1:00 pm EDT draft**

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Barry Flamm (BF), Colehour Bondera (CBo), Carmela Beck (CBe), Nick Maravell (Vice Chair) (NM)

Absent: John Foster (JFo)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work Plan

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Ferric Phosphate-snail bait (to remove)	CBe & ZS	Yes	08 15 12	Request for Add'l technical info sent to contractor on 4/27/12. Draft TR rcv'd and sent to ARS. Expect draft TR to be sent to CS the week of 7/30. Received supp. TR and ARS response 7/26/12.	Fall 2012
Propyleneglycolmonolaurate (PGML) -proposal	CBo	Yes	07 17 12	New TR sent to CS 2-13-12. TR accepted 4/17/12.	Fall 2012
Oxidized lignite (humic acid)	ZS	Yes	08 15 12	Petition sent to CS on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12. Draft TR sent to CS on 07/13. TR sufficiency sent 8/1/12	Fall 2012
Biodegradable Mulch Film Made From Bioplastics	CBe & ZS	Yes	08 15 12	Petition sent to CS on 2/23. Request for TR 4/4/12 (expected July 2012). Expect draft TR to be sent to CS the week of 7/30. TR received 8/2/12.	Fall 2012
Rotenone (For 205.602)	ZS	No	08 07 12	Proposal to list on 205.602, as prohibited.	Fall 2012

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
Polyoxin D Zinc Salt	HA	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13. Add'l questions sent from CS 8-15-12.	Spring 2013
Vinasse	NM			Petition sent to CS on 3/29. Sent request for feedback on feasibility for modified TR to LBrines. LB sent feedback 09 04 12	Spring 2013
Sulfuric acid (Stabilize digested poultry manure)-proposal	JFo		08 07	Petition sent to CS 4/2/12. Subcommittee deemed sufficient 6/5/12	Fall 2012
Antibiotics (Tetracycline) Petition Discussion doc	JR and ?	No		Sent to CS on 6/19/11; Needs petition sufficiency review. TR deemed sufficient	Spring 2013
Aquaculture-CO ₂	CBo, ZS			Petition sent to CS on 5-30-12. Determine whether TR is needed	Spring 2013?
Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Aquaculture-Micronutrients	?				
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
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Carbon monoxide (exhaust gas) Add to section 205.601	NM, JFe			Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Group is going to ask for further info from petitioner	
Inert Ingredients					
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	

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Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold- update from WG at fall 2012 meeting Group is working on Discussion document? As per Workplan 060812 (MB and MM)	Fall 2012
Organic seed?	ZS or JFo?			Possible update from Org Seed Alliance on org seed database at fall mtg.	Fall 2012?
GMO - seed purity	ZS			With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Spring 2012
EPA List 3 & 4 - Inerts	JFe		08 21 12	Discussion document. Under consideration by Inerts Working Group	Fall 2012

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	Fall 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve August 15 and 21 meeting notes
- Spring 2013 Workplan Issues discussion – any new thoughts [JFe]
- Update on Vinasse: TR request [NM]
- Petition for carbon monoxide (exhaust gas): (ii) determine whether TR is needed. [NM]
- Aquaculture: status check, issues to be addressed by joint Livestock and Crops meeting September 14 at 3:00pm
 - a. CO2 for aquaculture – more discussion on need for TR; any response update from AWG on revised petition? [CBe and ZS]
 - b. Chlorine for aquaculture – determine whether TR is needed. [CBo]
 - c. Lignin sulfonate (chelating agent for aquatic plants): (i) petition sufficiency review, (ii) determine whether TR is needed. [JFo]
 - d. Micronutrients: (i) petition sufficiency review, (ii) determine whether TR is needed.[CBe]
 - e. NOP: status of aquaculture guidance/policy?
- Process for reviewing public comments on NOSB proposals for fall 2012 meeting [JFe]
- Agenda for next meeting (Tuesday, September 18, 2:00pm EST)

Discussion

- Agenda: ZS asked for time to talk about Bioplastic Mulch proposal as she will miss next call.
- August 15 and 21 meeting notes approved with no changes.
- Spring 2013 Workplan: Group discussed looking at future (beyond 2015) sunset materials.
- Vinasse-Petitioned as synthetic and is statutorily prohibited for use as fertilizer. Would like to get a TR, but group is unsure if it should be an abbreviated TR or Full TR. If it comes back as non-synthetic then the group might ask for a full TR. NOP asked that the Subcommittee consider the options and benefits of one over the other. The lead supports a shortened TR. The group also noted that chemical residual issues complicate the situation, so the TR ideally will include information about residuals. A member felt there were a lot of chemical additives which makes the review very complicated. Additionally, based on the information they currently received, this material is synthetic and perhaps more information is not needed. A member asked about guidance from NOP on the Two-stage TR process, and NOP indicated that they did not know when the guidance would be available. NOP asked that the group reread the original petition and possibly vote

without requesting a TR.

- Petition for carbon monoxide (exhaust gas): used for rodent control. The lead member feels that this is not a petition for CO but instead it's for a device for exhaust gas as the petition states a brand-name product. Also unclear from the petition is what type of fuel is used to power the device (gas, diesel, etc?). It was suggested that perhaps looking at this petition as "other ingredients" is useful. If the group requests a TR it would have to specify exhaust gas from an internal combustion engine. A question was asked if this is currently prohibited. NOP indicated that it is prohibited, as any underground input is an input to the soil. It was also noted that intentional injection is not allowed, but incidental application by vehicles is not prohibited. Although the petitioner is asking for one ingredient, there are other chemicals involved in the process. The Subcommittee is going to create a list of questions for the petitioner to glean additional information.
- NOP updated the group about current rulemaking for certifying aquatic animals, which includes open and closed systems and aquatic plants (which can already be certified), and noted that a memo will be out soon. The Crops subcommittee will begin review of aquaculture systems and refer to TRs that have already been conducted. NOP asked that the CS do a gap analysis, in an effort to not ask for new TRs for items that are already on the National List (NL). A member asked about combining the TR for plants with that of fish. SJK will check and get back to group.
- Update on CO2: waiting for changes from George Lockwood and the Aquaculture Working Group (AWG).
- Chlorine for aquaculture. A member asked if the petitioned use is different than what's already allowed on the NL? The language in the petition is unclear. The Chair asked that the group begin filling out a checklist.
- Bioplastics: A member had a comment about some of the language in the Bioplastic Degradable Mulch proposal, and felt that "must not be from excluded methods" is too vague. Wants to include more specific language; "Genetically engineered bacteria and cornstarch".

Future Call Schedule:

Aug 7, 2012 2:00 EDT

- Discuss/vote on Rotenone proposal (ZS) – vote deferred from July 17th meeting
- Vote on sulfuric acid
- Discuss/Vote Ferric phosphate
- Review Biodegradable Plastic Mulch TR , if available CaB and ZS
- Review Inerts WG proposal, if available
- GMO seed purity discussion paper

Aug 15, 2012 1:00

The following items were not discussed on the August 7th call due to lack of time:

- Status check: Additional TR questions on Polyoxin D Zinc Salt circulated prior to call [HA]
- Status check: update on Vinasse: TR request [NM]
- Status check: Petition for carbon monoxide (exhaust gas): (ii) determine whether TR is needed. (NM)
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 - d. Micronutrients: (i)): (i) petition sufficiency review, (ii) determine whether TR is needed.(CBe)
 - e. NOP: status of aquaculture guidance/policy?
- Circulate Agenda for extra meeting (Wednesday, August 15, 1:00pm EST)

Aug 21, 2012 2:00 EDT

Vote on (“Inert”) Ingredients in Pesticide Formulations on the National List

Sept 4, 2012 2:00 EDT

Sept 18, 2012 2:00 EDT

- Review comments

Oct 2, 2012 2:00 EDT

- Review comments

Milestone	Deadline
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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday October 02, 2012 1:00 pm EDT**

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Barry Flamm (BF), Colehour Bondera (CBo), Carmela Beck (CBe), Nick Maravell (Vice Chair) (NM)

Absent: John Foster (JFo)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK),

Work plan

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Oxidized lignite (humic acid)	ZS	Yes	08 15 12	Petition sent to CS on 7/1/2011; Requested TR on 3/6/12. TR in Development (sent to TR contractor on 3/26/12). Draft TR sent to ARS for review 6/5/12. Draft TR sent to CS on 07/13. TR sufficiency sent 8/1/12	Fall 2012
Biodegradable Mulch Film Made From Bioplastics	CBe & ZS	Yes	08 15 12	Petition sent to CS on 2/23. Request for TR 4/4/12 (expected July 2012). Expect draft TR to be sent to CS the week of 7/30. TR received 8/2/12.	Fall 2012
Rotenone (For 205.602)	ZS	No	08 07 12	Proposal to list on 205.602, as prohibited.	Fall 2012

Petitioned Substances – Current status of review process					
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Vinasse	NM			Petition sent to CS on 3/29. Sent request for feedback on feasibility for modified TR to LBrines. LB sent feedback 09 04 12	Spring 2013
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Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency, or draft subcomm proposal?	TBD
Aquaculture-Micronutrients	?				
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601				Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	
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Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	

Petitioned Substances – Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes*	Meeting
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold- update from WG at fall 2012 meeting. Group is working on Discussion document? As per Workplan 060812 (MB and MM)	Fall 2012
Organic seed?	ZS or JFo?			Possible update from Org Seed Alliance on org seed database at fall mtg.	Fall 2012?
GMO - seed purity	ZS			With GMO ad hoc subcommittee	Fall 2012
GMO – plant breeding				With GMO ad hoc subcommittee	Spring 2012
EPA List 3 & 4 - Inerts	JFe		08 21 12	Discussion document. Under consideration by Inerts Working Group	Fall 2012

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
				Begin review fall 2013	Fall 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve September 4, 2012 subcommittee meeting notes
- Review/discuss public comments on PGML (CBo)
- Review/discuss public comments on Sulfuric Acid (JFo)
- Review/discuss public comments on Oxidized Lignite (Humic Acid (ZS)
- Review/discuss public comments on Rotenone (ZS)
- Review/discuss public comments on Ferric Phosphate (CBe)
- Biodegradable Mulch (ZS and CBe)
- Inerts Policy Proposal (JFe, ZS)
- Sufficiency of revised TR on Polyoxin D Zinc Salt; **VOTE** [See documents circulated to CS by Lisa Brines on 9-25-12; Subject line: NOSB Crops: Revised TR - Polyoxin D Zinc](HA)
- Applause and Adjourn

Discussion

- Agenda was approved with no changes
- Notes from September 4, 2012 approved with no changes
- Public comments on PGML: most commenters agreed with position that Crops has taken, but there were 5 in opposition and a correction from OMRI.
- Oxidized Lignite (Humic Acid): There was not much substantive information in the comments so group feels the recommendation will pass as is.
- Rotenone: Considered a human health hazard but it is allowed in other countries for bananas, as well as cacao, tea, and coffee production. Most commenters do not want it removed immediately. The group discussed instituting a grace period to allow growers to find alternatives, which they are supportive of. Another option would be to withdraw it and vote at a later date. NOP is trying to collect more data from ACAs and other countries, and SJK will also ask about grace periods. The Group requested this info prior to the NOSB

meeting so they can incorporate it into their recommendation. They are also interested in information about other crops that might be affected by this change.

- Ferric Phosphate: A summary of the comments received so far include; 26 in favor of listing as is, 11 in favor of delisting. A commenter remarked that there was a paper not cited in the TR, which ZS offered to find and distribute.
- Biodegradable Mulch: There were 27 commenters in favor of adding this to the list, and 3 opposed. One commenter recommended changing the name to bio film, from what is currently in the annotation (biodegradable bioplastic bio-mulch). The group discussed specific comments about specific annotations, and considered creating a revised proposal to be agreed upon via email before the meeting. However, due to time constraints the group felt that this might not be possible.
- SJK asked if the Subcommittee could vote on the Polyoxin D salt TR by tomorrow in an effort to return it to the contractor soon. The group generally feels that the TR is sufficient but they had a couple of questions regarding fungi and chitin inhibitor properties.
- Inerts: The Subcommittee discussed the short amount of time before the next meeting and generally feels that it is not reasonable to finish by then.
- Tetracycline. The Group found the TR sufficient but was unsure if it was posted to the website yet. MA will check with National List Manager and report back to Subcommittee.

Future Call Schedule:

Nov 6, 2012 2:00 EST

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	~August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday November 6, 2012 1:00 pm EST**

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Carmela Beck (CBe), John Foster (JFo), Colehour Bondera (CBo), Mac Stone (MS)-2013

Absent: Nick Maravell (NM) (Vice Chair), Barry Flamm (BF)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes	Meeting
Sulfurous Acid at 601(j)		Proposal		Begin review fall 2013	Fall 2013?
Sodium carbonate peroxyhydrate at 601(a)		Proposal		Begin review fall 2013	Fall 2013?
Aqueous potassium silicate at 601(e) and 601(i)		Proposal		Begin review fall 2013	Fall 2013?

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes*	Meeting
Polyoxin D Zinc Salt -proposal	HA/ZS	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13. Add'l questions sent from CS 8-15-12.	Spr 2013
Vinasse - proposal	NM			Petition sent to CS on 3/29. Sent request for feedback on feasibility for modified TR to LBrines. LB sent feedback 09 04 12	Spr 2013

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes*	Meeting
Antibiotics (Tetracycline) Proposal. Amend annotation, 205.601	HA/ZS	No		Sent to CS on 6/19/11; Needs petition sufficiency review. TR deemed sufficient	Spr 2013
Antibiotics (Streptomycin) proposal. Amend annotation, 205.601				NOP rcv'd petition but sent back to petitioner for revision before sending to the NOSB for review.	
Aquaculture-CO ₂	CBo, ZS			Petition sent to CS on 5-30-12. Will rqst modification from petitioner (for use pattern). Determine whether TR is needed	Spr 2013
Aquaculture-Chlorine	CBo	No		Petition sent to CS on 5-30-12. Determine petition sufficiency	Spr 2013/ Fall 2013
Aquaculture-Micronutrients	CBe/JFo			Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12.	Spr 2013
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) 205.601	JFo/CBe			Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12	Spr 2013/ Fall 2013
Aquaculture- plant production Vitamins (B1, B12, H) Petition				Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12	Spr 2013
Carbon monoxide (exhaust gas) Add to section 205.601	NM, JFe			Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. CS waiting for further info from NOP and their EPA contacts. May ask for an expedited TR.	Spring 2013
Indole-3-butyric acid (IBA). Add to section 205.601	JFo			Petition sent to CS on 11 02 12. Petition Sufficiency Response due 01 02 13.	

Inert Ingredients					
Inerts - Review priority inerts, complete groupings, exact number to be determined				Inerts - Review priority inerts, complete groupings, exact number to be determined	Spr 2013

Polyglyceryl phthalate ester of coconut oil fatty acid (inert)				Sent to CS on 6/1/11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes		On 1/21/2011 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 2/3/2011, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes		On hold	
Terpenes (inert)	?	Maybe		On hold	

Other Proposals					
Name	Contact	TR requested?	Vote Date	Notes	Meeting
Mushroom standards				Waiting to comment on rulemaking	
Food safety				On hold	
Fire blight (Tree fruit)	HA			On hold	
GMO - seed purity	ZS			Joint with GMO ad hoc Subcommittee	Spr 2013
GMO – plant breeding	ZS			Joint with GMO ad hoc Subcommittee	Spr 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve October 2, 2012 subcommittee notes
- Debrief Fall NOSB meeting. Thoughts and reflections on CS work, what worked well, what could have worked better?
- Updates from those leading on assignments.
- Subcommittee members take new assignments (under assignments pending)
- Discuss priority setting process for re-petitioned IBA

- **Crops Subcommittee work assignments for Spring 2013 NOSB meeting:**

- HA/ZS: Polyoxin D Zinc Salt; tetracycline petition
- CBe: Aquaculture micronutrients/trace elements
- CBo: Aquaculture CO2 (with ZS); Aquaculture chlorine
- JFe: Inerts (with ZS)
- JFo: Lignin sulfonate, Aquaculture micronutrients
- NM: Vinasse; Carbon Monoxide
- ZS: Aquaculture CO2 (with CBo); inerts (with JFe)

- **Assignments pending:**

- Sulfurous Acid – Sunset 2015 material at 601(j)
- Sodium carbonate peroxyhydrate – Sunset 2015 material at 601(a)
- Aqueous potassium silicate – Sunset 2015 material at 601(e) and at 601(i)
- indole-3-butyric acid (IBA)
- Seed Purity
- Plant Breeding
- Biodegradable Mulch Guidance (work with NOP)
- Streptomycin (Petition [?])

- Adjourn

Discussion

- Agenda approved
- October 2, 2012 subcommittee notes approved with no changes
- The group discussed their thoughts and reflections on the fall NOSB meeting, including what worked well and what could have worked better. One member noted that because of the structure of meeting, there was no opportunity to discuss difficult proposals ahead of time with other subcommittee members who may not be on the specific Subcommittee. Perhaps this is an issue for the Executive Subcommittee to discuss. One suggestion was that all members are invited to a conference call prior to the NOSB meeting. CBo suggested slowing the process, and instead of voting on items immediately after accepting public comment, perhaps digesting it and putting it off until the next meeting will be more thoughtful and useful.
- Updates on Crops Subcommittee work assignments for Spring 2013 NOSB meeting:
 - Polyoxin D (HA): The review is moving forward but HA will revisit the checklist to make sure it's complete. HA stated the TR was sufficient and asked JFo to update LB. HA asked NOP and the Crops Subcommittee members about his participation on

tetracycline, and a perceived conflict-of-interest (COI). The Subcommittee members feel there isn't a COI, and NOP will discuss further and confirm.

- The streptomycin petition was not forwarded to the CS yet, as it was sent back to the petitioner for additional information. (Sent Sept 9, 2012).
- Aquaculture micronutrients/trace elements. CBe needs additional info before proceeding and will work in conjunction with JFo to review both micronutrients/trace elements and lignin sulfonate. CBe will email petition sufficiency info next week.
- Aquaculture - CO2. CBo would like more information for clarification before ascertaining whether or not a TR is needed. ZS thought the petition was sufficient and didn't think we needed a TR. ZS and CBo have not been able to collaborate on this yet, and ZS noted that it might be best to work independently. The group asked if the petitioner had been contacted about changing the language in the petition to clarify the use of the CO2. CS was advised to request that the NL Manager contact the petitioner.
- The Chair asked about completion date for the aquaculture items and whether or not they should be done in the spring or fall of 2013, as indicated above. SJK will verify the date.
- Aquaculture chlorine- The group discussed materials that need to be grouped and coordinated, and whether or not they should ask for a supplemental TR, and how long it will take to get one. SJK will find out and report back to group.
- Inerts. ZS and JFe will request a meeting with NOP and the Inerts Working Group (IWG).
- Lignin sulfonate. The TR was deemed sufficient and was very detailed. It also captured historic uses and current uses very well. JFo will have the checklist prepared in the next two weeks, and the Chair will send an email to the National List Manager noting the petition sufficiency.
- The Subcommittee discussed Vinasse and the possibility of requesting a limited scope TR instead of a full TR.
- Carbon monoxide (exhaust gas) – In an effort to complete this item, the group discussed two ways forward: Asking the petitioner for clarification about what is actually being petitioned, and how it's being produced; or asking for an expedited TR. A member asked how each of these paths would affect the timing for reviewing this. SJK will find out and respond to group.
- Sunset 2015 materials aren't an immediate priority, as they are on the schedule for the fall 2013 meeting, but the Subcommittee will begin preliminary work while waiting for guidance from NOP about the process. If TRs are needed it would be beneficial to request those early.
- Seed purity/Plant breeding work will be done in conjunction with the GMO ad hoc Subcommittee. GMO ad hoc will write document and then send it to CS for input. ZS thinks it will result in 'next actions' and not a recommendation.
- Biodegradable Mulch Guidance. Guidance from NOP is expected, and the group asked about NOSB involvement. SJK will find out and report back to group. Could potentially be ready for fall 2013.
- Indole-3-butyric acid (IBA). According to the Policy & Procedures Manual (PPM), re-petitioned items that had previously been rejected by a board vote would be given the lowest priority - Priority 4, and would go to the bottom of the queue of petitioned materials. Since the Sunset 2015 materials are not pressing, the group could work on this. JFo will take the lead, and complete petition sufficiency determination for the December 18th meeting.

Future Call Schedule:

November 20, 2012 2:00 EST

Polyoxin D (HA): review checklist and proposal

December 4, 2012 2:00 EST

Lignin sulfonate (JFo): discuss

Aquaculture micronutrients/trace elements (CBe): discuss

December 18, 2012 2:00 EST

Indole-3-butyric acid (IBA) (JFo): petition sufficiency determination

January 9, 2013 2:00 EST

January 15, 2013 2:00 EST

February 5, 2013 2:00 EST

February 19, 2013 2:00 EST

March 5, 2013 2:00 EST

March 19, 2013 2:00 EST

MILESTONE	Target date
NOP – Complete tentative agenda	February 8, 2013
Spring 2013 proposals due to NOP	February 12, 2013
NOP - Post proposals, Publish FRN, Open public comment	February 19, 2013
Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013
Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday November 20, 2012 1:00 pm EST**

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Carmela Beck (CBe), John Foster (JFo), Colehour Bondera (CBo), Mac Stone (MS)-2013,

Absent: Nick Maravell (NM) (Vice Chair), Barry Flamm (BF)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes	Meeting
Sulfurous Acid at 601(j) Original petition 2008		3/2010 TR		Original recomm May2009 Begin review fall 2013	Fall 2013?
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006		8/2006 TR		Original recomm Nov 2007 Begin review fall 2013	Fall 2013?
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006		9/2003 TR		Original recomm Nov 2007 Begin review fall 2013	Fall 2013?

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes*	Meeting
Polyoxin D Zinc Salt Petition Polyoxin D Zinc Salt Addendum 1 Proposal. List at §205.601	HA/ZS	Yes		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13. Add'l questions sent from CS 8-15-12. TR deemed sufficient 11 20 12.	Spr 2013

Petitioned Substances – Current status of review process

Name	Contact	TR requested?	Vote Date	Notes*	Meeting
Vinasse – proposal. List at §205.601	NM			Petition sent to CS on 03 29 12. Sent request for feedback on feasibility for modified TR to LBrines. LB sent feedback 09 04 12. <i>The CS would like a quick modified TR on this as discussed if possible. Otherwise, we may ask for staff assistance and move to a vote on this at the Spring 2013 meeting.</i>	Spr 2013
Antibiotics (Tetracycline) Proposal. Amend annotation, §205.601	HA/ZS	No 4/2011 TR		Sent to CS on 06 19 11; Needs petition sufficiency review. TR deemed sufficient	Spr 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601		3/2011 TR 1/2006 TR		NOP rcv'd petition but sent back to petitioner for revision before sending to the NOSB for review. Apr 2011 Final Recomm.	
Aquaculture-CO₂ , List at §205.609	CBo, ZS	No		Petition sent to CS on 5 30 12. Will rqst modification from petitioner (for use pattern). Updated petition was deemed sufficient. TR deemed unnecessary.	Spr 2013
Aquaculture-Chlorine List at §205.609 and §205.611	CBo	No		Petition sent to CS on 5 30 12. Determine petition sufficiency. CS requested clarification from petitioner	Spr 2013/ Fall 2013
Aquaculture-Micronutrients List at §205.609	CBe/JFo			Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12?	Spr 2013
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 TR		Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12.	Spr 2013/ Fall 2013
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe			Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12	Spr 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe			Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. CS waiting	Spr 2013

Petitioned Substances – Current status of review process					
				for further info from NOP and their EPA contacts. May ask for an expedited TR. <i>The CS would like a quick modified TR, but we do not want that to slow down the process, so we would like staff assistance in reaching a decision to bring to the Spring 2013 NOSB meeting</i>	
Indole-3-butyric acid (IBA) 2012. List at §205.601 Indole-30butyric acid (IBA) 2008.	JFo	6/2011 TR		12/2011 Final Recomm. Petition sent to CS on 11 02 12. Petition Sufficiency Response due 01 02 13.	

Inert Ingredients					
Inerts				Inerts - Review priority inerts, complete groupings, exact number to be determined	Spr 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			On hold	Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes	On hold	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes		On 02 03 11, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	

Other Proposals					
Name	Contact	Doc type	Vote Date	Notes	Meeting

Mushroom standards				Waiting to comment on rulemaking	
Food safety			On hold	On hold	
Fire blight (Tree fruit)	HA		On hold	On hold	
GMO - seed purity	ZS	Disc doc 10/2012		Joint with GMO ad hoc Subcommittee	Spr 2013
GMO – plant breeding	ZS			Joint with GMO ad hoc Subcommittee	Spr 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve November 6, 2012 subcommittee notes
- Crops Subcommittee work assignments for Spring 2013 NOSB meeting:
 - HA: Polyoxin D Zinc Salt; tetracycline petition
 - CBe: Aquaculture micronutrients/trace elements
 - CBo: Aquaculture CO2 (with ZS); Aquaculture chlorine
 - JFe: Inerts (with ZS)
 - JFo: Aquaculture lignin sulfonate; indole-3-butyric acid (IBA) petition for reconsideration
 - NM: Vinasse; Carbon Monoxide/Exhaust Gas
 - ZS: Inerts (with JFe)
 - MS: nothing pending
- Assignments pending:
 - 1. Aquaculture Vitamins (B1, B12, and H)
 - 2. Sulfurous Acid – Sunset 2015 material at 601(j)
 - 3. Sodium carbonate peroxyhydrate – Sunset 2015 material at 601(a)
 - 4. Aqueous potassium silicate – Sunset 2015 material at 601(e) and at 601(i)
 - 5. Streptomycin (Petition) –sent back to petitioner by NOP with questions, waiting (HA)
 - 6. Seed Purity –in conjunction with Ad hoc GMO subcmte
 - 7. Plant Breeding –in conjunction with Ad hoc GMO subcmte

- 8. Biodegradable Mulch Guidance (work with NOP) –on hold
- Aquaculture Chlorine (CBo)
- Aquaculture Lignin Sulfonate clarification discussion on additional TR questions (JFo)
- Aquaculture CO₂ –update on question to AWG (JFe)
- Petition sufficiency discussion on Aquaculture micronutrients (CBe)
- Update on Polyoxin D Zinc, getting supplemental information request expedited (HA), Vinasse (NM), Carbon Monoxide/exhaust gas (NM). Assign Aquaculture Vitamins.
- Assignments for and deadline for TR sufficiency (need for updated info?)
 - 1. Sulfurous Acid – Sunset 2015 material at 601(j) (MS?)
 - 2. Sodium carbonate peroxyhydrate – Sunset 2015 material at 601(a) (ZS?)
 - 3. Aqueous potassium silicate – Sunset 2015 material at 601(e) and at 601(i) (JFe?)
- Adjourn

Discussion

- The agenda was approved with no additions or changes
- The November 6 Subcommittee notes were approved with no changes
- Aquaculture Chlorine (CBo) – CBo feels that if the NOSB allows chlorine for aquaculture, then it might open up the door to requests for chlorine for other things. The Chair asked that group focus on determination of petition sufficiency and the need for a TR first, before proceeding with a conversation about the substance. Questions arose surrounding the issues of essentiality and discharge. Variables between the systems (opens vs. closed, terrestrial vs. aquaculture) may be the key to this issue. CBo will compile questions to submit to NOP to forward to the petitioner for clarification. JFe will send questions to LBrines, and will determine at a later date whether or not to request a supplemental TR.
- The group discussed lignin sulfonate and the fact that it may pose the same problems as chlorine. A member noted that lignin sulfonate is added in very minute concentrations so it will not affect the discharge water. Another member added that if it leaves the system it will be bound to the micronutrients, which might affect things downstream. The conversation about lignin sulfonate will be combined with that of micronutrients, and JFe will send questions to the group via email regarding what should be asked for in the TR. The group suggested that requesting a focused or targeted TR might be sufficient.
- CO₂ – The group feels they do not need a TR, because although they have additional questions about the substance, they will not be addressed by a TR. The leaders of this (CBo and ZS) will complete a checklist with the additional questions for the next call. The petition was found to be sufficient, and no TR is needed
- Micronutrients - CBe has questions on nickel. It may have negative effects if overused.

- Polyoxin D – HA rewrote the checklist using the amended TR, and will send it to group for review, while waiting for clarification questions from manufacturer.
- Nick Maravell was assigned Vinasse and Carbon Monoxide/exhaust gas. Aquaculture vitamins were assigned to Carmela Beck.
- Jay wants TR request to go out in the next couple of weeks for sunset 2015 materials so that the Subcommittee doesn't get backlogged.

Future Call Schedule:

November 20, 2012 2:00 EST

Polyoxin D (HA): review checklist and proposal

December 4, 2012 2:00 EST

Discuss Lignin sulfonate/micronutrients/trace elements (JFo,CBe)

Continue discussion of CO2 (CBo, ZS)

Vinasse (NM)

Carbon Monoxide/exhaust gas (NM)

Assignments and deadline for TR sufficiency (need for updated info?)

- Sulfurous Acid – Sunset 2015 material at 601(j) (MS?)
- Sodium carbonate peroxyhydrate – Sunset 2015 material at 601(a) (ZS?)
- Aqueous potassium silicate – Sunset 2015 material at 601(e) and at 601(i) (JFe?)

December 18, 2012 2:00 EST

Indole-3-butyric acid (IBA) (JFo): petition sufficiency determination

January 9, 2013 2:00 EST

January 15, 2013 2:00 EST

February 5, 2013 2:00 EST

February 19, 2013 2:00 EST

March 5, 2013 2:00 EST

March 19, 2013 2:00 EST

MILESTONE	Target date
NOP – Complete tentative agenda	February 8, 2013
Spring 2013 proposals due to NOP	February 12, 2013
NOP - Post proposals, Publish FRN, Open public comment	February 19, 2013
Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013
Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday December 4, 2012 1:00 pm EST**

Present: Jay Feldman (Chair) (JFe), Harold Austin (HA), Zea Sonnabend (ZS), Carmela Beck (CBe), John Foster (JFo), Colehour Bondera (CBo), Nick Maravell (NM) (Vice Chair), Mac Stone (MS)-2013

Absent: Barry Flamm (BF)

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR		Original recomm May 2009 Begin review fall 2013	Spr 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS?	8/2006 TR		Original recomm Nov 2007 Begin review fall 2013	Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR		Original recomm Nov 2007 Begin review fall 2013	Spr 2014

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes*	Meeting
Polyoxin D Zinc Salt Petition Polyoxin D Zinc Salt Addendum 1 Proposal. List at §205.601	HA/ZS	Yes 9/2012 TR		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13. Add'l questions sent from CS 8-15-12. TR deemed sufficient 11 20 12.	Spr 2013

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Date of vote	Notes*	Meeting
Vinasse – proposal. List at §205.601	NM	Yes. Quick, modified TR		Petition sent to CS on 03 29 12. Sent request for feedback on feasibility for modified TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. Asked for staff assistance so they can vote on this at the Spring 2013 meeting.	Spr 2013
Antibiotics (Tetracycline) Proposal. Amend annotation, §205.601	HA/ZS	No 4/2011 TR		Sent to CS on 06 19 11; Needs petition sufficiency review. TR deemed sufficient	Spr 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	HA	3/2011 TR 1/2006 TR		NOP rcv'd petition but sent back to petitioner for revision before sending to the NOSB for review. Apr 2011 Final Recomm.	
Aquaculture-CO₂ , List at §205.609	CBo, ZS	No		Petition sent to CS on 5 30 12. Will rqst modification from petitioner (for use pattern). Updated petition was deemed sufficient. TR deemed unnecessary.	Spr 2013
Aquaculture-Chlorine List at §205.609 and §205.611	CBo	No		Petition sent to CS on 5 30 12. Determine petition sufficiency. CS requested clarification from petitioner	Spr 2013/ Fall 2013
Aquaculture-Micronutrients List at §205.609	CBe/JFo			Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12? CS sent request to NL Mgr 12 04 for additional info	Spr 2013
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 TR		Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12. CS sent request to NL Mgr 12 04 for additional info	Spr 2013/ Fall 2013
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe			Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12	Spr 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe			Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Petition	Spr 2013

Petitioned Substances – Current status of review process

				deemed insufficient 12 04 12.	
Indole-3-butyric acid (IBA) 2012. List at §205.601 Indole-3 -butyric acid (IBA) 2008.	JFo	6/2011 TR		12/2011 Final Recomm. Petition sent to CS on 11 02 12. Petition Sufficiency Response due 01 02 13.	

Inert Ingredients

Inerts				Inerts - Review priority inerts, complete groupings, exact number to be determined	Spr 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			On hold	Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes	On hold	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes	On hold	On 02 03 11, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	

Other Proposals

Name	Contact	Doc type	Vote Date	Notes	Meeting
Mushroom standards			On hold	Waiting to comment on rulemaking	
Food safety			On hold	On hold	
Fire blight (Tree fruit)	HA		On hold	On hold	

GMO - seed purity	ZS	Disc doc 10/2012		Joint with GMO ad hoc Subcommittee	Spr 2013
GMO – plant breeding	ZS			Joint with GMO ad hoc Subcommittee	Spr 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve November 20, 2012 Subcommittee notes
- Petition sufficiency discussion and TR questions on aquaculture micronutrients and lignin sulfonate (CBe); see proposed questions (JFe)
- Polyoxin D Zinc, Review draft checklist (HA)
- Update on Carbon Monoxide/Exhaust Gas NM
- Vinasse – Is it synthetic? (NM)
- CO2 checklist review update (CBo and ZS)
- Adjourn

Crops Subcommittee work assignments for Spring 2013 NOSB meeting:

HA: Polyoxin D Zinc Salt; tetracycline petition

CBe: Aquaculture micronutrients/trace elements; Aquaculture Vitamins (B1, B12, and H)

CBo: Aquaculture CO2 (with ZS); Aquaculture chlorine

JFe: Inerts (with ZS); Aqueous potassium silicate – Sunset 2015; Seed Purity –in conjunction with Ad hoc GMO subcmte (with ZS, CBo); Plant Breeding –in conjunction with Ad hoc GMO subcmte (with ZS, CBo)

JFo: Aquaculture lignin sulfonate; indole-3-butyric acid (IBA) petition for reconsideration

NM: Vinasse; Carbon Monoxide/Exhaust Gas

ZS: Inerts (with JFe); 3. Sodium carbonate peroxyhydrate – Sunset 2015

Assignments pending:

Sulfurous Acid – Sunset 2015 material at 601(j)

Streptomycin (Petition) –sent back to petitioner by NOP with questions, waiting (HA)

Discussion

- The agenda was approved with no changes.
- The November 20 Subcommittee notes were approved with no changes
- Polyoxin D Zinc salt –petitioned by Kaken pharmaceuticals as a synthetic. Produced through fermentation which would render the product synthetic but further manufacturing detail is not included in the petition to confirm as it is Confidential Business Info (CBI). Polyoxin D Zinc salt is a chitin inhibitor, and is listed as having no known deleterious effects on non-targeted species, which the group feels is unlikely. The material is relatively safe as long as the labeling of dangers is clear. The group discussed the questions/answers in the checklist and noted that they are still waiting for some info from the manufacturer. A member asked if the provenance of the zinc salt was disclosed. HA didn't think so, but ZS noted that Zinc, as far as she knows, is not mined, so it is synthetic. The group asked the NOP for an update about additional questions that were sent to TR contractor. The NOP will get back to group with an update. The members discussed a 2004 document generated by the NOSB and adopted into the Policy and Procedures Manual (PPM), that contains guidelines for determining compatibility
- Aquaculture micronutrients. CBe will forward checklist and be ready to discuss this on the next call.
- Update on Carbon Monoxide/Exhaust Gas (NM) - Petitioned for exhaust gas, not just CO, and there are many other chemicals in exhaust gas that are not compatible with organic production, and are not disclosed or discussed. Petition sufficiency is in question, and the group discussed options for moving forward. SJK suggested sending LBrines a list of questions with a note that the petition is not sufficient. SJK will ask LB for other examples that may be similar to this situation, and how they were resolved. The CS decided to reject the petition on the grounds that CO is not the only active compound utilized by the petitioner's device.
- Vinasse - (NM). Used as a fertilizer, and is synthetic so it is not allowed under OFPA. The group feels they need additional input to make this determination before moving forward. The members discussed how to proceed in light of the pending policy guidance - do they wait until new policy is released or proceed with current guidance? A member suggested operating under the current policy, unless the Deputy Administrator suggests otherwise. The group asked for input from other members from a technical perspective. A majority of members supported using the current policy and if the new policy is released then the material can be re-petitioned. JFe will send a request for a modified TR to LBrines.
- CO2 checklist-CBo and ZS will have update on next call.
- Lignin sulfonate – will discuss on next call. JFe will send a list of proposed questions (circulated in email prior to this call) to LBrines to send to the petitioner.
- Indole-3-butyric acid (IBA)-first draft will be presented on next call.
- Sulfurous Acid at 601(j) - CBo will lead this item.

Future Call Schedule:

November 20, 2012 2:00 EST

Polyoxin D (HA): review checklist and proposal

December 4, 2012 2:00 EST

Discuss Lignin sulfonate/micronutrients/trace elements (JFo, CBe) –postponed until Dec 18

Continue discussion of CO2 (CBo, ZS)

Vinasse (NM) - done

Carbon Monoxide/exhaust gas (NM) - done

Assignments and deadline for TR sufficiency (need for updated info?)

- Sulfurous Acid – Sunset 2015 material at 601(j) (MS?)
- Sodium carbonate peroxyhydrate – Sunset 2015 material at 601(a) (ZS?)
- Aqueous potassium silicate – Sunset 2015 material at 601(e) and at 601(i) (JFe?)

December 18, 2012 2:00 EST

Discuss Lignin sulfonate discussion (JFo, CBe)

Discuss micronutrients/trace elements (CBe, JFo)

CO2 checklist update (CBo and ZS)

Indole-3-butyric acid (IBA) petition sufficiency determination (JFo)

January 9, 2013 2:00 EST

January 15, 2013 2:00 EST

February 5, 2013 2:00 EST

February 19, 2013 2:00 EST

March 5, 2013 2:00 EST

March 19, 2013 2:00 EST

MILESTONE	Target date
NOP – Complete tentative agenda	February 8, 2013
Spring 2013 proposals due to NOP	February 12, 2013
NOP - Post proposals, Publish FRN, Open public comment	February 19, 2013
Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013

Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013
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Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday December 18, 2012 1:00 pm EST**

Present: Jay Feldman (Chair) (JFe), Nick Maravell (NM) (Vice Chair), Harold Austin (HA), Zea Sonnabend (ZS), Carmela Beck (CBe), John Foster (JFo), Colehour Bondera (CBo), Mac Stone (MS), Barry Flamm (BF)

Absent: none

Staff: Michelle Arsenault (MA), Stacy Jones King (SJK)

Work plan

Sunset 2015 - § 205.601 Synthetic substances allowed for use in organic crop production - Current status of review process					
Name	Contact	Technical Report (TR) requested?	Vote Date	Notes	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR		Original recomm May 2009 Begin review fall 2013	Spr 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS?	8/2006 TR		Original recomm Nov 2007 Begin review fall 2013	Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR		Original recomm Nov 2007 Begin review fall 2013	Spr 2014

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Vote Date	Notes*	Meeting
Polyoxin D Zinc Salt Petition Polyoxin D Zinc Salt Addendum 1 Proposal. List at §205.601	HA/ZS	Yes 9/2012 TR		Petition sent to CS on 3/19. Request for TR 4/3/12. Draft TR sent to CS 07/13. Add'l questions sent from CS 8-15-12. TR deemed sufficient 11 20 12.	Spr 2013

Petitioned Substances – Current status of review process					
Name	Contact	TR requested?	Date of vote	Notes*	Meeting
Vinasse - proposal. List at §205.601	NM	Yes. Quick, modified TR		Petition sent to CS on 03 29 12. Sent request for feedback on feasibility for modified TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. Asked for staff assistance so they can vote on this at the Spring 2013 meeting. Delayed TR will move to fall.	Fall 2013?
Antibiotics (Tetracycline) Proposal. Amend annotation, §205.601	HA/ZS	No 4/2011 TR		Sent to CS on 06 19 11; Needs petition sufficiency review. TR deemed sufficient	Spr 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR		NOP rcv'd petition but sent back to petitioner for revision before sending to the NOSB for review. Apr 2011 Final Recomm.	Fall 2013
Aquaculture-CO₂ , List at §205.609	CBo, ZS	No		Petition sent to CS on 5 30 12. Will rqst modification from petitioner (for use pattern). Updated petition was deemed sufficient. TR deemed unnecessary.	Spr 2013/Fall 2013
Aquaculture-Chlorine List at §205.609 and §205.611	CBo	No		Petition sent to CS on 5 30 12. Determine petition sufficiency. CS requested clarification from petitioner	Spr 2013/Fall 2013
Aquaculture-Micronutrients List at §205.609	CBe/JFo	2010 TR (Nickel)		Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12? CS sent request to NL Mgr 12 04 for additional info	Spr 2013/Fall 2013
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 TR		Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12. CS sent request to NL Mgr 12 04 for additional info	Spr 2013/Fall 2013
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe			Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12	Spr 2013/Fall 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe			Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Petition	N/A

Petitioned Substances – Current status of review process					
				deemed insufficient 12 04 12.	
Indole-3-butyric acid (IBA) 2012. List at §205.601 Indole-3 -butyric acid (IBA) 2008.	JFo	6/2011 TR No new TR rqstd		12/2011 Final Recomm. Petition sent to CS on 11 02 12. Petition found sufficient 12 18 12. No TR rqst	Spr 2013

Inert Ingredients					
Inerts update? Disc doc?				Inerts - Review priority inerts, complete groupings, exact number to be determined	Spr 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			On hold	Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	
1,1-Difluoroethane (inert)		Yes	On hold	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	
Manganese sulfate monohydrate (inert)		Yes	On hold	On 02 03 11, petitioner notified NOP they would like to continue review; CS may want to re-evaluate request for TR since this is an inert	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	

Other Proposals					
Name	Contact	Doc type	Vote Date	Notes	Meeting
Mushroom standards			On hold	Waiting to comment on rulemaking	
Food safety			On hold	On hold	
Fire blight (Tree fruit)	HA		On hold	On hold	

GMO - seed purity	ZS	Disc doc 10/2012		Joint with GMO ad hoc Subcommittee	Spr 2013
GMO – plant breeding	ZS			Joint with GMO ad hoc Subcommittee	Spr 2013

* Yellow highlight indicates committee action needed

Crops Subcommittee work assignments for spring 2013 NOSB meeting:

HA: Polyoxin D Zinc Salt; tetracycline petition (with ZS); streptomycin petition –sent back to petitioner by NOP with questions, waiting (with ZS)

CBe: Aquaculture micronutrients/trace elements; Aquaculture Vitamins (B1, B12, and H)

CBo: Aquaculture CO2 (with ZS); Aquaculture chlorine; Sulfurous Acid – Sunset 2015 material at 601(j)

JFe: Inerts (with ZS); aqueous potassium silicate – Sunset 2015; 3. Seed Purity –in conjunction with Ad hoc GMO subcmte (with ZS, CBo); Plant Breeding –in conjunction with Ad hoc GMO subcmte (with ZS, CBo)

JFo: Aquaculture lignin sulfonate; indole-3-butyric acid (IBA) petition for reconsideration

NM: Vinasse; Carbon Monoxide/Exhaust Gas

ZS: Inerts (with JFe); Sodium carbonate peroxyhydrate – Sunset 2015; tetracycline petition (with HA); streptomycin petition –sent back to petitioner by NOP with questions, waiting (with HA)

Agenda

- Approve agenda
- Approve December 4, 2012 subcommittee meeting notes
- General Update on Aquaculture
- Petition sufficiency discussion and TR questions on aquaculture micronutrients and lignin sulfonate (CBe)
- Tetracycline petition (HA and ZS)
- IBA checklist review - new information since Board action in fall 2011
- Check-Ins/Recap
- CO2 checklist review update (CBo and ZS)
- Polyoxin D Zinc, Review draft checklist (HA)
- Vinasse (NM)
- Carbon Monoxide/Exhaust Gas (NM)
- Inerts (JFe, ZS)
- Aquaculture Vitamins (B1, B12, and H) (CBe)
- Sodium carbonate peroxyhydrate - Sunset 2015 (ZS)

- Aqueous potassium silicate - Sunset 2015 (JFe)
- Sulfurous Acid - Sunset 2015 material (CBo)
- Next Meeting
- Adjourn

Discussion

- The agenda was approved as is
- December 4, 2012 subcommittee meeting notes approved with no changes
- General Update on Aquaculture (MS) - The goal for the spring 2013 meeting is to compose a discussion document addressing all the aquaculture materials as a group, then vote on them individually at the fall 2013 meeting. There are several items planned to aid the Board in its review: The Livestock and Crops Subcommittees will have expert(s) on calls to answer questions; there will be a presentation during the spring 2013 meeting; and a webinar given by the NOP in January to provide the NOSB with background on how past NOSB decisions resulted in the current practice standard recommendation that is the basis for the proposed rule (currently in development). A member asked who will be responsible for writing the general discussion document. MS suggested that each person develop questions about the specific material they are reviewing, then one person for Crops (CS) and one for Livestock (LS) could compile the questions. The two documents would then be fused into one and the members will determine who will present it at the spring NOSB meeting. The group feels that developing questions will be easy, but synthesizing the discussion document is going to be a large, time consuming project. CBo noted that members should use the Canadian standards as guidance, as they have already vetted some of the same issues.
- Aquaculture micronutrients and lignin sulfonate (CBe/JFo). The group discussed requesting a new TR for micronutrients, but decided to wait for the response from the petitioner on the additional questions that were sent on December 4. MS posed several bigger-picture questions. A member encouraged the group to keep in mind that the fate of Lignin Sulfonate should parallel that of micronutrients.
- Tetracycline petition (HA/ZS). The petitioner is requesting the removal of the expiration date and to have the material added back into the sunset process without annotation. ZS and HA are proceeding with a comprehensive review and history of this complicated and controversial material, including past NOSB recommendations, and the current state of the research into efficacy of alternatives. The group discussed looking at consumer preferences information, but decided that it might be unavailable or not very useful. A member asked about the goals for resetting the sunset clock. MS asked about streptomycin and how tetracycline this will dovetail with this. ZS will work on streptomycin and bring it back to the group. HA/ZS are considering a new expiration date and/or annotation.
- IBA checklist review - IBA was not recommended for addition to the list the last time it was petitioned (fall 2011 NOSB meeting). The revised petition includes additional detail and a narrowed scope of use, and the group feels that the petition is sufficient and that a TR is not necessary, as the technical content in the petition is current. JFo noted that he has familiarity and past experience with this material, and disclosed that he has used it for plant propagation. The group acknowledged that there are uncertainties with regard to the necessity of this material and compatibility with the Organic Standards. The members agreed that they would like to complete the review and vote on it during next meeting. JFe added that for re-petitions it is interesting that the group doesn't get a third party TR to

verify the new information, and that it might be useful to include such information to help inform the process. JFo will determine a completion date and forward it to JFe and MA. JFe will notify the NL manager that the petition was found sufficient.

- Check-Ins/Recap- The group did a very quick update of some of the remaining workplan items: JFe and ZS are moving forward with the review of Inerts; The Chair asked that the group be prepared to submit (or not) requests for TRs for sunset materials.
- Adjourned

Future Call Schedule:

December 18, 2012 2:00 EST

- Discuss Lignin sulfonate discussion (JFo, CBe)
- Discuss micronutrients/trace elements (CBe, JFo)
- CO2 checklist update (CBo and ZS)
- Indole-3-butyric acid (IBA) petition sufficiency determination (JFo)

January 7, 2013 2:00 pm EST - Aquaculture briefing

January 9, 2013 2:00 EST

- Vote on IBA
- Determine Sunset TRs

January 15, 2013 2:00 EST

February 5, 2013 2:00 EST

February 19, 2013 2:00 EST

March 5, 2013 2:00 EST

March 19, 2013 2:00 EST

Spring 2013 Milestones	Target date
NOP – Complete tentative agenda	February 8, 2013
Spring 2013 proposals due to NOP	February 12, 2013
NOP - Post proposals, Publish FRN, Open public comment	February 19, 2013
Subcommittees submit tentative workplans to NOP	March 1, 2013

Discuss workplans on ES call	March 8, 2013
NOP provides written comments on workplans to NOSB	March 11, 2013
Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013
Workplans finalized on ES call	March 29, 2013
Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013