

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
Wednesday January 9, 2013 2:00 pm EST**

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

Absent: Harold Austin (HA), 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 No new 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
Name	Contact	TR requested ?	Date of vote	Notes*	Meeting

Petitioned Substances – Current status of review process

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. 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		Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision, Rcvd revised petition 01 07 13 and sent back again for incompleteness.	Spr 2013?/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.	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	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	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	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	Fall 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe		N/A	Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Petition deemed insufficient 12 04 12.	N/A
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	JFe/ZS			Inerts - Review priority inerts, complete groupings, exact number to be determined	Spr 2013
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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 (Terminology for Excluded Methods)	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 18, 2012 subcommittee meeting notes
- Tetracycline petition (HA and ZS) – review checklist
- IBA recap and vote
- Check-Ins/Recap/TR response time?
 - Polyoxin D Zinc, petitioner response? (HA)
 - Vinasse (NM)
 - Carbon Monoxide/Exhaust Gas (NM)
 - Inerts (JFe, ZS)
 - Aquaculture Vitamins (B1, B12, and H) (CBe)
 - Aquaculture: CO2 (CBo and ZS)
- Do leads for sunset materials believe an updated TR is needed to conduct review? (Take questions by email as follow up): (i) Aqueous potassium silicate – Sunset 2015 (JFe) – see attached questions in checklist format, (ii) Sodium carbonate peroxyhydrate – Sunset 2015 (ZS), (iii) Sulfurous Acid – Sunset 2015 material (CBo)
- (If time allows) Aquaculture thoughts after policy briefing and what CS would like to see as follow up
- Next Meeting
- Adjourn

Discussion

- The agenda was approved with no changes except ZS noted she is not ready to discuss Aquaculture - CO₂.
- December 18, 2012 subcommittee meeting notes were approved with no changes
- Tetracycline petition (HA and ZS). The intent of the proposal is to recap the history of the substance and the original review and to look at the more recent research available and fill in any gaps. The group discussed proposing an extended phase-out on the expiration date of 2017 and an annotation to require growers to use alternatives. The proposal and annotation are not written yet, as the members are still gathering info. SJK added that an annotation may not be necessary, as it could be part of the preamble or guidance, but ZS noted that the preference is to have it in the annotation at the outset, for the purpose of enforceability. ZS and HA plan to have an annotation written for the next meeting. The consensus is that tetracycline needs to be phased out but the Board is cognizant of consumers and growers, and would advocate for a longer phase out period. A member asked about alternatives, and how this situation was different than what was already in the regulation. ZS replied that they would like to specify amounts instead of only including vague language about “trying to use alternatives” with the intent of preparing growers for the elimination of antibiotics by 2017. A member cautioned the group about the difference between an accreditation problem versus the regulation at § 605.206, when the regulation is adequate. JFe asked if JFo would be willing to write some language summarizing this for inclusion in the checklist. Another member in support of not adding lengthy annotations noted that this notion is similar to the pasture rule, whereby there were unseen implications of becoming too prescriptive. JFe asked that the group continue the discussion via email if there is a need to discuss further. ZS asked that people help contribute to the annotation. Additional info is requested by Monday afternoon, Jan 14
- Members discussed aquaculture and the path forward for preparing their review. JFe will work on questions, and MS suggested talking with Max Mayeaux of the USDA to clarify some topics. The group is hoping to have a series of seminars to elucidate some of the points that were not addressed on the aquaculture call last week. JFe asked about TR requests for the aquaculture materials and if the group felt they could be ready in the next 30 days. SJK asked about sending Max Mayeaux an example of a TR and Supplemental TR so he can evaluate how the questions may need to be altered in the context of an aquaculture production system, so the Subcommittee

can determine if they are asking the right questions. ZS asked how aquatic plants are different from hydroponics, and suggested that this needs to be reevaluated for consistency.

- Aqueous potassium silicate: The chair asked if the group felt that they should go forward with a TR. A checklist was circulated for review with the agenda.
- Sulfurous acid: The lead person recommended a TR request for this material
- Sodium carbonate peroxyhydrate: The lead person noted that they have adequate information for the review and would not recommend requesting a new TR. JFe asked if the checklist could be ready for the Jan 15 meeting.
- IBA. There is new information in the petition, but it was difficult to find, so JFo will re-circulate the checklist with the hope that the group can vote on this during the next meeting (Jan 15)
- Adjourned
- ABS note: The table above was altered to reflect the new target meeting date for the aquaculture petitions.

Future Call Schedule:

January 9, 2013 2:00 EST

Vote on IBA - postponed until next meeting

Determine Sunset TRs

January 15, 2013 2:00 EST

Vote on IBA

Discuss/vote Tetracycline proposal and checklist

Discuss checklist for sodium carbonate peroxyhydrate

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

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Wednesday January 15, 2013 2:00 pm EST**

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

Absent: Mac Stone (MS), Nick Maravell (NM) (Vice Chair)

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					
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Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR		Original recomm May 2009 Begin review fall 2013	Spr 2014
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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
Name	Contact	TR requested ?	Date of vote	Notes*	Meeting

Petitioned Substances – Current status of review process

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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	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	Fall 2013
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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	Fall 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe		N/A	Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Petition deemed insufficient 12 04 12.	N/A
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	JFe/ZS			Inerts - Review priority inerts, complete groupings, exact number to be determined	Spr 2013
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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 (Terminology for Excluded Methods)	ZS			Joint with GMO ad hoc Subcommittee	Spr 2013

* Yellow highlight indicates committee action needed

Crops Subcommittee

Work Assignments, Draft Agenda (January 15, 2013/2:00pmEST meeting), Action Items

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 (sent back to petitioner)

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 January 9, 2013 subcommittee meeting notes
- Tetracycline petition (HA and ZS) – review checklist and vote
- IBA (JFo) – additional thoughts and vote
- Polyoxin D Zinc (HA) – update and next steps
- Sodium carbonate peroxyhydrate – Sunset 2015 (ZS) – TR necessary?
- Next Meeting
- Adjourn

Discussion

- The agenda was approved with no changes
- January 9, 2013 Subcommittee meeting notes were approved with a note to the ABS that one of the links in the workplan table above was not working.
- HA summarized the Tetracycline petition and proposal and the group discussed various aspects. There were several changes made to the document since the last call, including the separation of the discussions of apples (expiring in 2017) and pears (remove expiration date). Since the organic pear industry is much more vulnerable than that of apples (if tetracycline is prohibited, virtually the entire organic pear industry will disappear from the market), the group felt this was the best way to discuss/review them. The default motion would be to include the 2017 expiration date for both apples and pears. Topics that were discussed include: annotations, which a member thought might be redundant (i.e. pest control and alternatives); the intention of the proposal and if it would be required to label pears as antibiotic free, which was not something that was considered when writing the proposal; and the historical context from past Board deliberations. ZS indicated that the current Board is in a better position to make an informed decision The NOP asked about the way forward for a grower if all of the alternatives are exhausted, to which a member replied that this scenario would not occur because there are many variables that can be adjusted from year to year. The NOP asked for clarification about the motions that would be included in the proposal, and asked that the members consider how things would proceed for voting. The chair indicated that he would like to take a straw vote today and continue to work on the document before taking an official vote. A member asked for clarification of the motion, since it is complicated. For example, are there implications from removal of the expiration date?

Straw vote tetracycline for pears: Yes: HA, CBe, JFo, ZS No: CBo, BF, JFe, NM

Straw vote: tetracycline for apples: Yes: HA, CBe, JFo, ZS, No: CBo, BF, JFe, NM

ZS added that a different annotation might result in a different outcome, and requested that the others who cast a no vote weigh in with any suggestions. BF will send around some language from the last Board recommendation.

- The group did not have time to discuss the remainder of the agenda items, so MA added an additional call on Jan 29

Future Call Schedule:

January 9, 2013 2:00 EST

Vote on IBA - postponed until next meeting
Determine Sunset TRs

January 15, 2013 2:00 EST

Vote on IBA -postponed
Discuss/vote Tetracycline proposal and checklist -postponed
Discuss checklist for sodium carbonate peroxyhydrate

January 29, 2013 2:00 EST – additional call

Vote on IBA
Final discussion/vote on Tetracycline proposal and checklist
Discuss checklist for sodium carbonate peroxyhydrate

February 5, 2013 2:00 EST

February 19, 2013 2:00 EST

March 5, 2013 2:00 EST

March 19, 2013 2:00 EST

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes – Additional call
Tuesday January 29, 2013 2:00 pm EST**

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

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

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Name	Contact	TR requested ?	Date of vote	Notes*	Meeting

Petitioned Substances – Current status of review process

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Crops Subcommittee

Work Assignments, Draft Agenda (January 29, 2013/2:00pmEST meeting), Action Items

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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)

FT: No assignments yet.

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)

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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 January 15, 2013 subcommittee meeting notes
- Polyoxin D Zinc (HA) – review new points on checklist and VOTE
- IBA (JFo) – review new points on checklist and VOTE
- Tetracycline petition (HA and ZS) – new thoughts, prepare for 2/1 meeting
- Sodium carbonate peroxyhydrate – Sunset 2015 (ZS) – TR necessary? –postponed to next meeting. Not ready yet.
- Next Meeting
- Adjourn

Discussion

- The agenda was approved as is, with the postponement of the discussion of sodium carbonate peroxyhydrate to the next meeting
- The January 15, 2013 subcommittee meeting notes were approved with no changes
- Polyoxin D Zinc (HA) –The group discussed new information that was added to the document since the last discussion and made some edits to the language. A member reminded the group to be mindful of the language when the classification vote is taken as the petitioner originally classified it as non-synthetic but revised it and re-classified it as synthetic. Group considered whether or not there is an impact on the beneficial aspects, and acknowledged that there is some CBI included that hinders their review. The members also discussed zinc concentrations.

Vote on Polyoxin D Zinc. Chair asked for any COIs-none reported

- Motion to classify Polyoxin D Zinc (CAS # 146659-78-1) as petitioned as synthetic:
- Motion by: HA
- Seconded by: CBo
- The members had no declarations of interest or additional discussion
- Yes: 8 No: 0 Abstain: 0 Absent: 0 Recuse: 0

- Motion to list Polyoxin D Zinc (CAS # 146659-78-1) as petitioned on §205.601

- o Motion by: HA
- o Seconded by: CB
- o No further discussion
- o Yes: 3 No: 4 Abstain: 1 Absent: 0 Recuse: 0

The Chair indicated that the vote will remain open until February 5, 2013 if members would like to reread any of the documents that were presented. ABS note February 5: the vote was closed with no changes.

- IBA -JFo gave a brief summary of IBA and acknowledged that the addition of language from JFe was very helpful. It was also noted that 5 growers provided support for this material. The NOSB had rejected broader uses of IBA in the past and the petitioner narrowed the scope of the item and resubmitted the petition. Although the resubmitted petition didn't include any new technical info, it was rewritten in such a way to highlight some pertinent information that was not evident in the first petition.

Vote on IBA:

Motion to classify IBA (CAS# 133-32-4) as petitioned as synthetic:

Motion by: JFo

Seconded by: HA

There were no declarations of interest or any further discussion

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

Motion to list IBA as petitioned (CAS# 133-32-4) on §205.601 for the purpose of plant propagation via dipping.

Motion by: JFo

Seconded by: HA

No further discussion

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

- Tetracycline (Antibiotics). The group discussed potential questions for Brenda Book of the Washington State Department of Agriculture who will join the call on Friday to discuss antibiotics. Members were asked to send questions to HA by Wednesday afternoon (January 30) so he could compile them and forward them to Brenda prior to the call. A member noted that pears and apples are grown in different regions in CA which is not the case in WA State and that the information that has been presented so far seems to be WA centric.

Straw vote: tetracycline for pears **taken Jan 15 during call:** Yes: HA, CBe, JFo, ZS No: CBo, BF, JFe, NM

Straw vote: tetracycline for apples **taken Jan 15 during call:** Yes: HA, CBe, JFo, ZS, No: CBo, BF, JFe, NM

Vote on Tetracycline via email as of Jan 24 2013:

Motion #1:

Motion to remove the expiration date of October 21, 2014 and add the following annotation for tetracycline for apples only,

§205.601 Synthetic substances allowed for use in organic crop production

(i) As plant disease control. (12) Tetracycline, for fire blight control in apples only until October 21, 2017. Orchard management systems must demonstrate and document annual increase in the extent or number of alternative practices for controlling fire blight.

Motion by: HA
Seconded by: ZS
Yes: 4 No: 4 Absent: 0 Abstain: 0 Recuse: 0

Motion #2:

Motion to remove the expiration date of October 21, 2014 and add the following annotation for pears:
§205.601 Synthetic substances allowed for use in organic crop production.

(i) As plant disease control.

(12) Tetracycline, for fire blight control in pears only. Orchard management systems must demonstrate and document annual increase in the extent or number of alternative practices for controlling fire blight.

Motion by: Harold Austin
Seconded by: Zea Sonnabend
Yes: 4 No: 4 Absent: 0 Abstain: 0 Recuse: 0

The group noted that a backup vote on the motion is not required and the voting order should be reversed, so the motion for Pears would be voted on first, so if it does not pass at the NOSB meeting, they then can choose to combine the motions. **The vote was left open so if members wanted to change their vote or propose a substitute motion they could.**

Future Call Schedule:

January 15, 2013 2:00 EST

Vote on IBA –delayed due to time constraint
Discuss/vote Tetracycline proposal and checklist – delayed for additional discussion and edits/will vote via email
Discuss checklist for sodium carbonate peroxyhydrate

January 29, 2013 2:00 EST Extra call

Vote on IBA
Review vote for Tetracycline proposal and checklist
Discuss checklist for sodium carbonate peroxyhydrate

February 5, 2013 2:00 EST

Discuss checklist for sodium carbonate peroxyhydrate

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

Spring 2013 Milestones	Target date
NOP – Complete tentative agenda	February 8, 2013
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Workplans finalized on ES call	March 29, 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 February 5, 2013 2:00 pm EST**

Present: Jay Feldman (Chair) (JFe), Zea Sonnabend (ZS), Carmela Beck (CBe), John Foster (JFo), Colehour Bondera (CBo), Harold Austin (HA), Nick Maravell (NM) (Vice Chair), Francis Thicke (FT), Mac Stone (MS) – non voting member

Absent: Stacy Jones King (SJK)

Staff: Michelle Arsenault (MA), Emily Brown Rosen (EBR) substituting for 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 No new 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. (CAS # 146659-78-1) List at §205.601	HA/ZS	Yes 9/2012 TR	01 29 13	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. CS requested addtl info from TR contractor. TR revisions sent to CS 1/18/13	Spr 2013
Name	Contact	TR requested ?	Date of vote	Notes*	Meeting

Petitioned Substances – Current status of review process

Vinasse - proposal. List at §205.601	NM	Yes. Expedited , 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. Delayed TR - will move to fall.	Fall 2013
Antibiotics (Tetracycline) Proposal. Amend annotation, §205.601	HA/ZS	No 4/2011 TR	Straw poll: 01 15 13 Vote recorded : 1 29 13	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		Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision, Rcvd revised petition 01 07 13 and sent back again for incompleteness.	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.	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	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	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	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	Fall 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe		N/A	Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Petition deemed insufficient 12 04 12.	N/A
Indole-3-butyric acid (IBA) 2012 . CAS# 133-32-4 List at §205.601 Indole-3 -butyric acid (IBA) 2008 .	JFo	6/2011 TR No new TR rqstd	01 29 13	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	JFe/ZS	N/A	N/A	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	
GMO - seed purity	ZS	Disc doc 10/2012	GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013
GMO – plant breeding (Terminology for Excluded Methods)	ZS		GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013

* Yellow highlight indicates committee action needed

Agenda

Crops Subcommittee work assignments for Spring 2013 NOSB meeting:

HA: 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)

FT: No assignments yet.

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

NM: Vinasse; Carbon Monoxide/Exhaust Gas (sent back to petitioner)

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)

Approve agenda

Approve January 29, 2013 subcommittee meeting notes

Sodium carbonate peroxyhydrate. Sunset 2015 (ZS). TR necessary?

Inerts update (ZS and JFe)

Tetracycline petition, debrief meeting with WSDA, questions, thoughts, next steps, etc.

Workplan Issues for Fall 2013

Next Meeting

Adjourn

Discussion

- Agenda was approved as is
- January 29, 2013 subcommittee meeting notes approved with clarifications to the voting for tetracycline to be completed by MA (Corrections made 02 06 13 by MA). The Jan. 24 vote was a straw vote, followed by an official email vote, with provision that the committee may decide to revoke.
- Sodium carbonate peroxyhydrate - Sunset 2015 (ZS). The group discussed whether or not a new TR would be necessary. The members feel the old TR is not adequate to conduct the new review so they recommend requesting a new one. The NOP will also review the documents and see if a supplemental TR or a full TR is needed. ZS compiled 6 key questions for submission, and would like to revisit the annotation when the TR is received. A member noted that the previous NOSB recommendation for this substance is not posted on website. (MA will correct this)
- JFe will send a request to the National List Manager (LB) by Thursday Feb 7 for TRs for the three sunset materials, and seek input about whether or not a full TR is needed. The NOP noted that the old TRs may require updating.
- Inerts update (ZS and JFe) – The group discussed the presentation time for this item at the spring 2013 meeting, and suggested that it could be presented during the NOP update time on Tuesday. The update will include information about the grouping of materials; 16 groups, 9 individual materials, some of which will require TRs. The next steps include preparing a Federal Register notice to request information about any additional items that should be included. Workplan items for fall 2013: pending TR requests, the Crops Subcommittee will be able to complete some of the workplan items such as Vinasse.
- A member noted that the Classification Guidance might be coming out soon, which could mean that the CS may need to revisit some classifications, such as vinasse and soy protein isolate.
- Tetracycline petition, debrief meeting with WSDA, questions, thoughts, next steps, etc.
 - NM made a motion to move ahead with a 2-year extension for tetracycline (with an expiration date of 2016). He also suggested no annotation beyond that, but instead the inclusion of a rationale for stakeholders. A member asked if this was the same as a statement already included in the current checklist about “moving towards alternative methods”. NM felt that, as a grower, the language is too general and enforcement may be difficult, but that a 2-year extension would convey to the community that the NOSB intention is to phase out tetracycline. A member added that the language included in the narrative is more for the certifier than the growers. A member supported submission of the document as is, so they could decide how to proceed once the public has had a chance to comment. In response to a question about growers exhausting the alternatives, ZS noted that the possibilities are never exhausted because there are many variables that can be altered each season: timing, weather, materials, combinations, pruning schedules, etc.

The group discussed including the revised motion with two annotations, the second to include a vote for the “sense of the Board”. The NOP does not recommend an earlier expiration date as the rulemaking process will take the majority of that time, at which point it will be time to re-evaluate. JFe encouraged the group to keep the annotations in the vote, rather than deciding to add one later at the meeting, after the public comment period closes.

Vote on Tetracycline:

The Subcommittee was unanimous in its decision to vote again on tetracycline.

Motion # 1:

Motion to amend listing of tetracycline to remove the expiration date of 2014 and add the following annotation:
For use in control of fireblight in apples and pears until Oct 21, 2016

Motion by: NM

Seconded by: HA

Discussion: the Chair noted for the record that members are voting before we have the completed document.

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

Motion # 2:

The subcommittee discussed wording for an additional resolution, to this effect: The National Organic Standards Board is committed to the phase out of this material. The board urges growers and certifiers between now and the 2016 expiration date, to encourage an annual increase in the extent and/or number of alternative practices that are trialed for controlling fire blight. In addition, the board strongly supports increased support for research into these alternative practices and materials.

- MA will add an extra Crops call for Monday Feb 11 at 2:00pm ET to finalize the tetracycline proposal.

Future Call Schedule:

January 29, 2013 2:00 ET Extra call

Vote on IBA

Review vote for Tetracycline proposal and checklist

Discuss checklist for sodium carbonate peroxyhydrate

February 5, 2013 2:00 ET

Discuss checklist for sodium carbonate peroxyhydrate

Inerts update (ZS and JFe)

Tetracycline petition, debrief meeting with WSDA, questions, thoughts, next steps, etc.

Workplan Issues for Fall 2013

February 11, 2013 2:00 ET – additional call

February 19, 2013 2:00 ET

March 5, 2013 2:00 ET

March 19, 2013 2:00 ET

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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 February 11, 2013 2:00 pm ET**

Present: Jay Feldman (Chair) (JFe), Zea Sonnabend (ZS), Carmela Beck (CBe), Colehour Bondera (CBo), Harold Austin (HA), Mac Stone (MS), Nick Maravell (NM) (Vice Chair), Francis Thicke (FT)

Absent: John Foster (JFo)

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

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 No new 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. (CAS # 146659-78-1) List at §205.601	HA/ZS	Yes 9/2012 TR	01 29 13	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. CS requested addtl info from TR contractor. TR revisions sent to CS 1/18/13	Spr 2013
Name	Contact	TR requested ?	Date of vote	Notes*	Meeting

Petitioned Substances – Current status of review process

Vinasse - proposal. List at §205.601	NM	Yes. Expedited , 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. Delayed TR - will move to fall.	Fall 2013
Antibiotics (Tetracycline) Proposal. Amend annotation, §205.601	ZS/HA	No 4/2011 TR	Straw poll: 01 15 13, vote recorded: 1 29 13 Revoted 02 05 13. Voted on resolution: 02 11 13	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		Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision, Rcvd revised petition 01 07 13 and sent back again for incompleteness.	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.	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	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	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	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	Fall 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe		N/A	Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Petition deemed insufficient 12 04 12.	N/A
Indole-3-butyric acid (IBA) 2012 . CAS# 133-32-4 List at	JFo	6/2011 TR No new	01 29 13	12/2011 Final Recomm. Petition sent to CS on 11 02 12. Petition	Spr 2013

Petitioned Substances – Current status of review process

§205.601 Indole-3 -butyric acid (IBA) 2008.		TR rqstd		found sufficient 12 18 12. No TR rqst	
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Inert Ingredients

Inerts update	JFe/ZS	N/A	N/A	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	
GMO - seed purity	ZS	Disc doc 10/2012	GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013
GMO – plant breeding (Terminology for Excluded Methods)	ZS		GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013

* Yellow highlight indicates committee action needed

Agenda

- Approve agenda for call
- Approve February 5, 2013 subcommittee meeting notes

- Vote on tetracycline resolution

Discussion

- Agenda was approved with no changes
- February 5, 2013 subcommittee meeting notes were deferred to the next call so the Subcommittee members had time to review them
- **Vote on Tetracycline:**

Motion # 1: Voted on during the February 5, 2013 call

Motion # 2:

Resolution: The National Organic Standards Board is committed to the phase out of this material. The board urges growers and certifiers between now and the 2016 expiration date, to encourage an annual increase in the extent and/or number of alternative practices that are trialed for controlling fire blight. In addition, the board strongly advocates to the USDA a high priority for increased support for research into these alternative practices and materials.”

Motion by: NM

Seconded by: ZS

Additional Discussion: none

Yes: 7 No: 0 Absent: 1 Abstain: 0 Recuse: 0

The group discussed some additional edits that were made to the most recent version of the document (2013 oxytet checklist draft 9 ZS), and had a vigorous debate about various aspects of the document including blocks of text in the checklist, scientific references about persistence, reference to specific people, and the minority and majority opinions. A member suggested simplifying the checklist by not marking both Yes and No for the same item. The group discussed this, and one member noted that the checklist and narrative were intentionally meant to be redundant. A member noted that although he agreed with the suggestion that the checklist be simplified, it seems like this is being suggested very late in the process and would have benefited from hearing about this sooner. Another member suggested submitting 2 separate checklists—one for the minority, and one for majority opinion. Which she then offered was not necessary, because sometimes there is not a clear answer and having both a yes and no answer reflects that. One of the members suggested adding footnotes to some of the yes/no line items for easy reference. The group decided 1) to eliminate redundancies between the checklist and the narrative, and 2) to maintain the majority/minority opinion in the document, based on their interpretation of the science. HA will make the changes discussed and send the document to the group before submitting it to the NOP.

Future Call Schedule:

February 5, 2013 2:00 EST

Discuss checklist for sodium carbonate peroxyhydrate

Inerts update (ZS and JFe)

Tetracycline petition, debrief meeting with WSDA, questions, thoughts, next steps, etc.

Workplan Issues for Fall 2013

February 11, 2013 2:00 EST – additional call

February 19, 2013 2:00 EST

March 5, 2013 2:00 EST

March 19, 2013 2:00 EST

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday February 19, 2013 2:00 pm ET**

Present: Jay Feldman (Chair) (JFe), Zea Sonnabend (ZS), Carmela Beck (CBe), Colehour Bondera (CBo), Harold Austin (HA), Mac Stone (MS), Francis Thicke (FT)

Absent: John Foster (JFo), Nick Maravell (NM) (Vice Chair)

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
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Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	Yes 8/2006 TR		Original recomm Nov 2007 Request for TR 2 14 13	Proposal Spr 2013
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	Yes 9/2003 TR		Original recomm Nov 2007 Request for TR 2 14 13	Proposal Spr 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 (CAS # 146659-78-1) List at §205.601	HA/ZS	Yes 9/2012 TR	01 29 13	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. CS requested addtl info from TR contractor. TR revisions sent to CS 1/18/13	Proposal Spr 2013
Name	Contact	TR requested?	Date of vote	Notes*	Meeting

Vinasse List at §205.601	NM	Yes. Expedited , 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. Delayed TR - will move to fall.	Proposal Fall 2013
Antibiotics (Tetracycline) Proposal. Amend annotation, §205.601	ZS/HA	No 4/2011 TR	Straw poll: 01 15 13, vote recorded: 1 29 13 Revoted 02 05 13. Vote on resltion: 02 11 13	Sent to CS on 06 19 11; Needs petition sufficiency review. TR deemed sufficient	Proposal Spr 2013
Antibiotics (Streptomycin) Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TR		Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision, Rcvd revised petition 01 07 13 and sent back again for incompleteness. Sent to CS 02 28 13. Sufficiency due 04 29 13	Proposal Fall 2013
AQ guidance/standards for plants	ZS				TBD
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.	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	Fall 2013
Aquaculture-Micronutrients List at §205.609	CBe/JF o	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	Fall 2013
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CB e	2/2011 T R		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	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	Fall 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe		N/A	Petition sent to CS on 06 06 12. Petition Sufficiency Response due 08 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Due	N/A

				NLT 04 23 13	
Indole-3-butyric acid (IBA) 2012 . CAS# 133-32-4 List at §205.601 Indole-3-butyric acid (IBA) 2008 .	JFo	6/2011 TR No new TR rqstd	01 29 13	12/2011 Final Recomm. Petition sent to CS on 11 02 12. Petition found sufficient 12 18 12. No TR rqst	Proposal Spr 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide		Petition sent to CS on 02 14 13.	

Inert Ingredients					
Inerts update	JFe/ZS	N/A	N/A	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	
GMO - seed purity	ZS	Disc doc 10/2012	GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013
GMO – plant breeding (Terminology for Excluded Methods)	ZS		GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013

* Yellow highlight indicates committee action needed

Agenda

Crops Subcommittee work assignments for Spring 2013 NOSB meeting:

HA: 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)

FT: No assignments yet.

JFe: Inerts (with ZS); Aqueous potassium silicate – Sunset 2015 –request for updated TR sent to Lisa; Plant Breeding –in conjunction with Ad hoc GMO subcmte (with ZS, CBo)

JFo: Aquaculture lignin sulfonate

NM: Vinasse; Carbon Monoxide/Exhaust Gas (sent back to petitioner)

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)

- Approve agenda
- Approve February 5 and February 11, 2013 subcommittee meeting notes
- Status of TR requests
- Review schedule for posting of comments, public comment closing date, procedure for CS review and reporting back on public comments, reassessment of CS positions based on public comments, as needed
- Assign magnesium oxide petition. [Please think about volunteering for this.]
- Workplan Issues for Fall 2013
- Next Meeting
- Adjourn

Discussion

- Agenda was approved as is.
- February 5, 2013 Subcommittee meeting notes approved with no changes
- February 11, 2013 Subcommittee meeting notes approved with no changes
- Status of TR requests – SJK indicated that the Vinasse TR is in development, and she would try to find out more information. The TRs for the three sunset items have been requested and the Subcommittee is awaiting their arrival. LB confirmed by phone to expect it during April 2013.
- Aquaculture items: fall 2013: ZS and Miles McEvoy were going to look at past NOSB recommendations (one on aquatic plants and one on terrestrial plants in green houses) to help inform the aquaculture review and the workplan moving forward. MA will put a placeholder on the workplan, AQ guidance/standards for aquatic plants (see table above).
- JFe asked for ZSs help with magnesium oxide and classification, and FT volunteered to review the material.
- A member asked about the status of the workplan, and whether or not the draft plan would be ready for discussion/acceptance by the next Executive Subcommittee call (March 8).
- JFe suggested adding residues in compost feedstock to the workplan as a potential item and the group discussed this. The idea would be to draft a document about contaminants. A member felt that this is covered under §205.203 and the Unavoidable Residual Environmental Contaminations (UREC) provisions, and because breakdown of residues in the compost process has not been studied, the NOSB would not be able to produce useful results. The members suggested asking the Deputy Administrator about the NOP guidance (policy memo?) that

was drafted and whether or not it is still in process. Members also discussed anaerobic digestion and vermi-compost, and manure as well, noting that heavy metal contamination falls under the manure standards for general contamination on §205.203. The consensus was that this item would not be a good use of time for the Subcommittee.

- A member noted that there was an information-sharing meeting on antibiotics at Organicology which several Board members participated in. A member asked about the sense of community with regard to the tetracycline opinion: It varies based on geographic location, but West Coast growers are generally supportive. MS asked about the potential for an overwhelming numbers of public commenters, and how the Board would accommodate this. Some members indicated that in the past the Board has chosen to stay late in order to hear all the comments. Another option would be to connect people so they could determine whether or not their comments echoed those of many others, and perhaps they could choose one representative who would speak for the many. JFe offered to help MA coordinate this effort.

Future Call Schedule:

February 19, 2013 2:00 EST

March 5, 2013 2:00 ET

March 19, 2013 2:00 ET

March 27, 2013 2:00 ET- addition call to discuss public comments

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

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

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday March 5, 2013 2:00 pm ET**

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

Absent: Carmela Beck (CBe), Mac Stone (MS)

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

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	Yes 3/2010 TR		Original recomm May 2009 Request for TR 2 14 13	Proposal Spr 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	Yes 8/2006 TR		Original recomm Nov 2007 Request for TR 2 14 13	Proposal Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	Yes 9/2003 TR		Original recomm Nov 2007 Request for TR 2 14 13	Proposal 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 (CAS # 146659-78-1) List at §205.601	HA/ZS	Yes 9/2012 TR	01 29 13	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. CS requested addtl info from TR contractor. TR revisions sent to CS 1/18/13	Proposal Spr 2013
Name	Contact	TR requested?	Date of vote	Notes*	Meeting

Vinasse List at §205.601	NM	Yes. Expedited , 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. Delayed TR - moved to fall 2013.	Proposal Fall 2013
Antibiotics (Tetracycline) Proposal. Amend annotation, §205.601	ZS/HA	No 4/2011 TR	Straw poll: 01 15 13, vote recorded: 1 29 13 Revoted 02 05 13. Vote on resltion: 02 11 13	Sent to CS on 06 19 11; Needs petition sufficiency review. TR deemed sufficient	Proposal Spr 2013
Antibiotics (Streptomycin) Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TR		Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision, Rcvd revised petition 01 07 13 and sent back again for incompleteness. Sent to CS 02 27 13. Sufficiency due 04 29 13	Proposal Fall 2013
AQ guidance/standards for plants	ZS				TBD
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.	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	Fall 2013
Aquaculture-Micronutrients List at §205.609	CBe/JF o	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	Fall 2013
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CB e	2/2011 T R		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	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	Fall 2013
Carbon monoxide (exhaust gas) List at §205.601	NM, JFe		N/A	Petition sent to CS on 06 06 12Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from	N/A

				EPA 03 07 13 addressing CS's questions. Petition suffic due 04 23 13	
Indole-3-butyric acid (IBA) 2012 . CAS# 133-32-4 List at §205.601 Indole-3 -butyric acid (IBA) 2008 .	JFo	6/2011 TR No new TR rqstd	01 29 13	12/2011 Final Recomm. Petition sent to CS on 11 02 12. Petition found sufficient 12 18 12. No TR rqst	Proposal Spr 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide		Petition sent to CS on 02 14 13. Petition sufficiency due ~ 04 15 13	Fall 2013

Inert Ingredients					
Inerts update	JFe/ZS	N/A	N/A	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	
GMO - seed purity	ZS	Disc doc 10/2012	GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013
GMO – plant breeding (Terminology for Excluded Methods)	ZS		GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013

* Yellow highlight indicates committee action needed

Agenda

Crops Subcommittee work assignments for Spring 2013 NOSB meeting:

HA: 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)

FT: No assignments yet.

JFe: Inerts (with ZS); Aqueous potassium silicate Sunset 2015 request for updated TR sent to Lisa; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo)

JFo: Aquaculture lignin sulfonate

NM: Vinasse; Carbon Monoxide/Exhaust Gas (sent back to petitioner)

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)

- Approve agenda
- Approve February 19, 2013 Subcommittee meeting notes (sent out 2-25-13)
- Status of TR requests from NOP staff
- Workplan Issues for Fall 2013
- Discuss Compost, other possible workplan issues
- Discussion of public comments to-date
- Next Meeting
- Adjourn

Discussion

- The agenda was approved with the addition of an item to discuss the NOSB meeting agenda
- February 19, 2013 Subcommittee meeting notes approved with no changes
- Status of TR requests
 - Antibiotics (Streptomycin) - ZS will review petition for sufficiency and have it ready for discussion on the March 19 call.
 - Magnesium oxide. FT will review petition for sufficiency and have it ready for discussion on the April 2 call, or perhaps after the spring meeting.
 - Polyglyceryl phthalate ester of coconut oil fatty acid (inert) – The Chair asked about including this in the inert review. EBR is checking into this to make sure all inerts that have been petitioned will be combined with IWG plan for review.
 - SJK will send JFo email from G. Lockwood regarding the Aquaculture petition for lignin sulfonate (chelating agent for aquatic plants)
- Workplan items

- Potential discussion doc re: allowance of green waste in organic systems productions and potential for contaminants such as pesticides, herbicides, heavy metals, antibiotics or animal drugs. The NOP 5016 Guidance on allowance of Green Waste says “non-organic crop residues or lawn clippings may contain pesticide residues. Provided ... that any residual pesticide levels do not contribute to the contamination of crops, soil or water, the compost is acceptable for use in organic production.” A member wanted clarification about how to identify “contamination”. The Subcommittee feels that considering green waste alone is not useful, if this topic is to be addressed it should include manure as well as compost. With that, and given that this is a complex project, the group discussed defining contamination as a long term workplan item, and crafting a white paper, which could then be used as the basis for research priorities or as the foundation for a discussion document. A member added that this is a very difficult topic due to lack of research, and the data that have been collected to date are sparse and were determined to be non-definitive. The NOP suggested that perhaps a petition as a prohibited natural for a certain types of manure could be a formal way to tackle this project on a smaller scale. The group discussed several ideas, such as starting with heavy metals as the first topic, and whether or not that would be an attainable goal. The consensus from the group is that they would like to put it on the workplan for spring 2014, and could always start working on it earlier. A member supported this and added that this is an issue in the community and feels that it is a topic that should be addressed. Other issues raised included problems associated with anaerobically digested liquid manure, and potential harm to soil microbes. The NOP noted that before it is added to the workplan, the Subcommittee needs to define the problem to be addressed and it must then be vetted by the Executive committee. A member reminded the group that this would be a long term project, and noted that it took OMRI 2 years to develop their standards on heavy metals in fertilizer and compost. Another member added that he supports inclusion of this on the workplan, but asked that the group keep in mind the needs of the farmers and growers, and supplying the growers with tools that they don’t have to second guess. An issue was raised regarding whether these are new problems or are a result of more sensitive detection levels. Likely, both are factors. The Chair will rewrite the workplan item based on today’s discussion, recirculate it, and present it to the Executive Subcommittee on Friday.
- ZS suggested two workplan items. 1) A review of the hydroponics and aquatic plants recommendations as a baseline before reviewing the aquaculture petitions. These two prior recommendations seem to be contradictory, and she feels this must be addressed before proceeding with the review for the rest of the aquaculture items. The group acknowledged the need for expediency so they can move ahead with the aquaculture petitions. As a follow up at the end of the call, the NOP determined that the April 2010 Hydroponics standards stated they were for terrestrial plants, so this particular past recommendation didn’t conflict with the current Boards review. 2) Guidance for using biodegradable mulch. JFe will present these two items to the Executive Subcommittee on the next call.
- Public comments. So far there haven’t been many comments, but it is still early in the process and the group feels that people will need time to submit thoughtful comments.

Future Call Schedule:

March 5, 2013 2:00 ET

March 19, 2013 2:00 ET

March 27, 2013 2:00 ET- additional call to discuss public comments

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday April 2, 2013 2:00 pm ET**

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

Absent: Nick Maravell (NM) (Vice Chair), Francis Thicke (FT)

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
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Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	Yes 8/2006 TR		Original recomm Nov 2007 Request for TR 2 14 13	Proposal Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	Yes 9/2003 TR		Original recomm Nov 2007 Request for TR 2 14 13	Proposal Spr 2014

Petitioned Substances – Current status of review process

Name	Contact	TR requested?	Vote Date	Notes*	Meeting
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AQ guidance/standards for plants	ZS				TBD
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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	Fall 2013

Carbon monoxide (exhaust gas) List at §205.601	NM, JFe		N/A	Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Petition suffic due ~04 23 13	N/A
Indole-3-butyric acid (IBA) 2012 . CAS# 133-32-4 List at §205.601 Indole-3 -butyric acid (IBA) 2008 .	JFo	6/2011 TR No new TR rqstd	01 29 13	12/2011 Final Recomm. Petition sent to CS on 11 02 12. Petition found sufficient 12 18 12. No TR rqst	Proposal Spr 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide		Petition sent to CS on 02 14 13. Petition sufficiency due ~ 04 15 13	Fall 2013

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

Other Proposals					
Name	Contact	Doc type	Vote Date	Notes	Meeting
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Food safety			On hold	On hold	
GMO - seed purity	ZS	Disc doc 10/2012	GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013

GMO – plant breeding (Terminology for Excluded Methods)	ZS		GMO voted 02 06 13	Joint with GMO ad hoc Subcommittee. GMO is lead.	Spr 2013
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* Yellow highlight indicates committee action needed

Agenda

- Approve agenda
- Approve March 27, 2013 Subcommittee meeting notes
- CS public comments and board member presentations. Oxytetracycline, PDZS, and IBA

Discussion

- The agenda was approved as is
- March 27, 2013 Subcommittee meeting notes were not sent to the Subcommittee yet for approval.
- The members summarized and discussed and public comments in relation to Oxytetracycline, PDZS, and IBA. As for the presentation, ZS and HA will present the majority opinion and JFe will present the minority opinion. Members intend on addressing some of the misconceptions that were presented in the comments regarding residues of tetracycline and language in OFPA. Members are discussing some additional issues regarding the expiration date with the NOP prior to the meeting, and suggested some supplemental language which would allow use as an emergency spray. A member asked if the NOSB has jurisdiction over this, and if they are interfering in what amounts to a certification decision. Members felt that this was sanctioned in Section 18 of the Emergency Spray Provision, and will double check with the Deputy Administrator. The two members who held the minority opinion discussed their views including not undermining the supporting science. Members discussed the opinion of the grower community that the Board is not composed of scientists, and the members noted that their hope is that the expert panel will be able to address some of the concerns.
- IBA- The vast majority of comments were against the inclusion of IBA on the list, which will be summarized and presented at the meeting
- PDZS- The vast majority of comments were against the inclusion of Polyoxin D zinc salt.
- The Inerts update is in progress, which will be presented by the NOP at the meeting.

Future Call Schedule:

March 27, 2013 2:00 ET- additional call to discuss public comments

April 2, 2013 2:00 ET

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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday May 7, 2013 2:00 pm ET**

Present: Jay Feldman (Chair) (JFe), Zea Sonnabend (ZS), Colehour Bondera (CBo), Harold Austin (HA), Mac Stone (MS), John Foster (JFo), Francis Thicke (FT)

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

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13		Spr 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR No new TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal. List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13.		Fall 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Waiting for response		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.		Fall 2013

Petitioned Substances					
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 11 20 12. TR deemed suff 11 20 12		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 12 for additional info		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 12 for additional info		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		Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR	Petition sent to CS on 02 14 13. Petition Sufficiency response due 05 21 13		Fall 2013

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	

Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* Yellow highlight indicates committee action needed

Agenda

Crops Subcommittee work assignments for Fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO₂; Aquaculture chlorine; Sulfurous Acid for Spring 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR's for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, need to make TR sufficiency determination; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR's for any groups?; streptomycin petition (with HA); Sodium carbonate peroxyhydrate for Spring 2014 (Sunset 2015), waiting on TR; aquaculture guidance/standards for plants.

- Approve agenda
- Approve notes of crops subcommittee meetings on March 27, 2013 and April 2, 2013
- Workplan Issues for Fall 2013
 - a. TR sufficiency determination for Vinasse
 - b. Streptomycin petition – schedule presentation and vote
 - c. aquaculture materials petition – schedule presentations and vote
 - d. magnesium oxide petition – schedule presentation and vote
 - e. aquaculture guidance/standards for plants schedule
 - f. Inerts – request for TRs for some groupings?
 - g. contaminants in farm inputs schedule

- Timing of NOP response to NOSB request to investigate possible use of emergency use (7 U.S.C. 6518(k)(6) and 7 C.F.R. 205.672) of tetracycline use for fire blight
- May 3 Federal Register on NOSB decisions on carrageenan infant formula annotation, cellulose annotation, and inerts annotation (FR notice attached)
- Thoughts on Spring 2013 NOSB meeting
- Next Meeting

Discussion

- The agenda was approved as is
- March 27 and April 2, 2013 Subcommittee meeting notes approved with no changes.
- Workplan Issues for fall 2013.
 - Vinasse TR was sent to CS on April 29. The Chair would like to move forward with the petition sufficiency determination and as such, asked the members to review it. A member noted that it would be helpful to have an analysis of the final manufacturing step where supplemental additives are added to prevent further fermentation, but that the TR contractor is not able to answer those questions, so sending it back would not be productive. The group discussed the classification of Vinasse as synthetic, and if it is viewed as a fertilizer, then there is no need to move forward. The petition states that it was petitioned as a plant nutrient/soil amendment. A member had a specific question about this and will send via email.
 - Streptomycin petition - members will continue the review of this material. HA offered to assist ZS, who has already begun this review.
 - Aquaculture materials petition – The group scheduled the discussions for various materials (see below) and suggested that there may be a need to develop aquatic plants guidance in the future.
 - Magnesium oxide petition (FT). FT will have a document for the group to review for the next meeting and will discuss the need (or not) for TR
 - Hydroponics policy statement - The NOP intends on issuing guidance about this.
 - Inerts - FR notice is still with General Counsel (expected this summer), and the Working Group will be meeting next week, so the CS will wait and not request TRs on any groups at this time. The task force will be able to prepare and prioritize things in anticipation for the release of the FR.
 - Contaminants in farm inputs. JFo noted that the group should keep in mind past NOSB experiences and information, and the NOP response to these instances. Additionally, members noted the applicable guidance that already exists. The group discussed how to move forward including setting up a framework as a first step. This project is going to be large, and long term and the members felt it was necessary to create a workplan for the topic before determining any deadlines for project sub-goals.
- Timing of NOP response to NOSB request to investigate possible use of emergency use clause for tetracycline – The NOP response is high priority so SJK didn't feel it needed to be added to the workplan. The Chair will discuss this on the Executive call this Friday.
- May 3 Federal Register Notice about NOSB decisions on carrageenan, infant formula annotation, cellulose annotation, and inerts annotation – The NOSB will discuss this during the Executive Subcommittee call this Friday.

- Feedback about the spring 2013 meeting – The group discussed various aspects of the meeting, including the introduction of the emergency clause for tetracycline, without having voted on the main recommendation first. Many people were uncomfortable with the way the process was handled because several Board members and many members of the public were not aware of this document until it was projected on the screen. The group discussed the usefulness and purpose of the prep meeting, and the fact that some of the public feels the board is having “private” meetings. The meeting is intended to be preparatory in nature in an effort to make sure members are familiar with the entire slate of proposals that will be presented, and to familiarize the group with logistics and administrative details. No votes are taken nor final decisions made at this meeting.

Future Call Schedule:

May 7, 2013 2:00 ET

May 21, 2013 2:00 ET

Aquaculture-CO₂ (CBo, ZS)

Magnesium oxide (FT)

June 4, 2013 2:00 ET

Aquaculture-Chlorine (CBo)

June 18, 2013 2:00 ET

Aquaculture-Vitamins (CBe)

Aquaculture-Lignin Sulfonate (JFo/CBe)

Aquaculture-Micronutrients (CBe/JFo)

Streptomycin (ZS/HA)

July 2, 2013 2:00 ET

Streptomycin (ZS/HA)

July 16, 2013 2:00 ET

AWG if needed

August 6, 2013 2:00 ET

August 20, 2013 2:00 ET

September 3, 2013 2:00 ET

September 17, 2013 2:00 ET

October 1, 2013 2:00 ET

October 15, 2013 2:00 ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	
Public comment closes	October 1, 2013

NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 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 May 21, 2013 2:00 pm ET**

Present: Jay Feldman (Chair) (JFe), Colehour Bondera (CBo), Harold Austin (HA), John Foster (JFo), Francis Thicke (FT), Mac Stone (MS), Zea Sonnabend (ZS)

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

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13		Spr 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR No new TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal. List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13.		Fall 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Waiting for response		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.		Fall 2013

Petitioned Substances					
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 11 20 12. TR deemed suff 11 20 12		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 12 for additional info		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 12 for additional info		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		Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested		Fall 2013

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	

Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* Yellow highlight indicates committee action needed

Agenda

Crops Subcommittee work assignments for Fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO2; Aquaculture chlorine; Sulfurous Acid for Spring 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR’s for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, need to make TR sufficiency determination; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR’s for any groups; streptomycin petition (with HA); Sodium carbonate peroxyhydrate for Spring 2014 (Sunset 2015), waiting on TR; aquaculture guidance/standards for plants.

- Approve agenda
- Approve notes of Crops Subcommittee meeting on May 7, 2013
- Workplan Issues for Fall 2013
 - magnesium oxide petition – discussion and TR sufficiency (FT)
 - CO2: aquaculture (CBo)
 - contaminants in farm inputs document/proposed plan (JFe)
 - Inerts update (JFe)
- Report on ES discussion on NOP investigation of possible use of emergency use (7 U.S.C. 6518(k)(6) and 7 C.F.R. 205.672) of tetracycline use for fire blight
- Adjourn

Discussion

- The agenda was approved as is
- May 7, 2013 Subcommittee meeting notes approved without changes.
- Workplan Issues for Fall 2013
 - Magnesium oxide petition – discussion and TR sufficiency (FT) – Magnesium Oxide is a synthetic substance petitioned to control viscosity for liquid suspension of humates. It's used as lime and is benign in soil, but is also non-essential. There are alternatives on the National List, and a member asked if the petition mentioned these and/or discussed the need for Magnesium Oxide over the others. The lead reviewer found the petition to be very thorough and the group considered the need for a TR. MgO is made from salt brine pumped from deep wells and the group thought that perhaps a TR could potentially give them more insight into any potential environmental concerns associated with the manufacturing process. They also discussed whether or not the NOSB could research those questions on their own. A member posed several questions: would the manufacturing process sway their determination, what subheading on §601 would this fit under, and where do we draw the line between essentiality and usefulness? Most members felt that the additional information about the manufacturing process would not alter their view. Subheading (j) soil amendments would be the only location under 601 that would be relevant. The consensus was that there are no detrimental effects but MgO is only essential if you apply it in liquid form, as opposed to other substances that can be applied dry. The petitioner indicated that it is preferable to apply as a liquid for worker health safety, and ease of application. The CS found the petition sufficient, and determined that they could complete the additional research on their own without requesting a TR.
 - CO₂: aquaculture (CBo) – The members discussed the review of this substance and the petition and the inherent difficulties since there are no previous standards or guidance. Instead they relied on a previous recommendation from the Handling Subcommittee. CO₂ is either mined or produced as a bi-product of a manufacturing process, and can be either a synthetic or non-synthetic process. The members discussed various topics such as the Canadian standards, and the worse-case scenario for CO₂ effects on the environment under typical use patterns. The NOP indicated that they did not have any background data, but thought that perhaps the AWG would, so JFe will compile a list of questions for the AWG. The petitioner was previously asked to provide additional information about several petitions, and he indicated that all the answers to the questions were already included in the petition. As a follow up to the response, the group asked for specific references in writing so they could locate the answers. The members would also like to have an aquatic plant expert available to answer questions in addition to the petitioner.
 - Contaminants in farm inputs document/proposed plan (JFe) – The Chair sent a draft document to group, which included background information that they discussed on the last call. A member noted that if the intent was for this to be a proposal for spring 2014 the timeline seemed too quick. The Chair noted that it is intended to be a discussion document not a proposal, but the member still felt spring 2014 was too early a target date. Members discussed inviting Lindsay Fernandez-Salvador from OMRI to speak about the process OMRI uses for screening for contaminants. They also discussed whether or not the NOSB should take up this review if OMRI has a similar, comprehensive document. A member noted that there would potentially always be unfinished work.
 - Inerts update (JFe) - The Inerts Working Group has not met since last CS meeting, but there is ongoing work being conducted.

- The Chair relayed information from the last ES call for those who weren't on it, regarding the fireblight emergency spray. The NOP determined it was not viable, and JFe asked that the NOP look further at this issue.

Future Call Schedule:

May 21, 2013 2:00 ET
 Aquaculture-CO₂ (CBo, ZS)
 Magnesium oxide (FT)

June 4, 2013 2:00 ET
 Aquaculture-Chlorine (CBo)
 Magnesium oxide (FT)

June 18, 2013 2:00 ET
 Aquaculture-Vitamins (CBe)
 Aquaculture-Lignin Sulfonate (JFo/CBe)
 Aquaculture-Micronutrients (CBe/JFo)
 Streptomycin (ZS/HA)

July 2, 2013 2:00 ET
 Streptomycin (ZS/HA)

July 16, 2013 2:00 ET
 AWG if needed

August 6, 2013 2:00 ET
 August 20, 2013 2:00 ET
 September 3, 2013 2:00 ET
 September 17, 2013 2:00 ET
 October 1, 2013 2:00 ET
 October 15, 2013 2:00 ET

Fall 2013 Milestones	Target date
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NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 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 June 4, 2013 2:00 pm ET**

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

Absent: Francis Thicke (FT)

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13		Spr 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR No new TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal. List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13.		Fall 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Waiting for response		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.		Fall 2013

Petitioned Substances					
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 11 20 12. TR deemed suff 11 20 12. Sent follow up questions to LB and are awaiting answers.		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 12 for additional info		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 12 for additional info		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		Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested		Fall 2013
Laminarin List at 205.601	TBD		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13.		TBD

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	

Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO₂; Aquaculture chlorine; Sulfurous Acid for Spr 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR’s for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, need to make TR sufficiency determination; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR’s for any groups?; streptomycin petition (with HA); Sodium carbonate peroxyhydrate for spring 2014 (Sunset 2015), waiting on TR; aquaculture guidance/standards for plants.

Agenda

- Approve agenda
- Approve notes of crops subcommittee meeting on May 21, 2013
- Workplan Issues for Fall 2013
 - a. magnesium oxide petition – discuss recommended proposal (FT)
 - b. CO₂: aquaculture – next steps (CBo)
 - c. chlorine: aquaculture – discuss checklist and related issues (CBo)
 - d. contaminants in farm inputs document/proposed plan - update (JFe)

- e. Inerts update (JFe)
- Assign petitioned material: Addition of laminarin to section 205.601 of the National List. Please think about volunteering to lead the CS on this. See email from Lisa Brines, dated June 4, 2013
- Adjourn

Discussion

- The agenda was approved as is
- The May 21, 2013 Subcommittee meeting notes were approved with a minor change to the CO2 discussion (the addition of the phrase “and can be either a synthetic or non-synthetic process.”)
- Workplan Issues for Fall 2013
 - a. Magnesium oxide petition (FT). The Chair will let the NOP know that they will not request a new TR and will let FT know to proceed with the proposal and the annotation.

 - b. CO2: Aquaculture next steps (CBo) – The group discussed whether or not they could move forward before the aquaculture rule is out. MS indicated that the Subcommittees should move forward with their reviews, and have them ready for the fall meeting, unless the review is not complete. The goal is to not rush through it for fall just to get it done, but to do it thoughtfully and accurately. Petition sufficiency was determined earlier and there was no request for a new TR. ZS noted that the checklist used was out of date and information that she had provided was omitted from the review and therefore the draft proposal was unbalanced. Additionally, information about terrestrial plants should not have been included as it is not relevant.

 - c. Chlorine: aquaculture (CBo). The group discussed the petition and use of this material as a sanitizer, and discussed the need for more clarification. The Chair asked for a determination whether a TR is needed for chlorine. The Chair also asked that all petition sufficiency determinations for all aquaculture substances on the workplan be completed in the next 2 weeks. Poly-culture is built into organics and so if the standards for that and aquatic plant production were available, it would be easier to conduct this review. MS stated that CS members should not rush into completing the petition review for the fall meeting if they didn't feel they had enough background information nor information on practical applicability in the petition.

 - d. Contaminants in farm inputs document/proposed plan - update (JFe) JFe wrote a more concise outline with timeframes because the original document had too large a scope, and will circulate it the group.

 - e. Inerts update (JFe) - The next Inerts Working Group call is June 13th and an update will be provided on the next CS call.

 - f. Assign petitioned material: Addition of laminarin to section 205.601 of the National List. Please think about volunteering to lead the CS on this.
- Meeting adjourned

Future Call Schedule:

- June 4, 2013 2:00 ET
 - Aquaculture-Chlorine (CBo)
 - Magnesium oxide (FT)
- June 18, 2013 2:00 ET
 - Laminarin Assignment
 - Aquaculture-Vitamins (CBe)
 - Aquaculture-Lignin Sulfonate (JFo/CBe)
 - Aquaculture-Micronutrients (CBe/JFo)
 - Streptomycin (ZS/HA)
- July 2, 2013 2:00 ET
 - Streptomycin (ZS/HA)
- July 16, 2013 2:00 ET
 - AWG if needed
- August 6, 2013 2:00 ET
- August 20, 2013 2:00 ET
- September 3, 2013 2:00 ET
- September 17, 2013 2:00 ET
- October 1, 2013 2:00 ET
- October 15, 2013 2:00 ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 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 June 18, 2013 2:00 pm ET**

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

Absent: none

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13		Spr 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR No new TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13		Spr 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal. List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13.		Fall 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient...		Fall 2013

Petitioned Substances					
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.		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 11 20 12. TR deemed suff 11 20 12. Sent follow up questions to petitioner and are awaiting answers.		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 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13		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 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13		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. Petition found sufficient 06 18 13		Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested		Fall 2013
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13.		TBD

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	

1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO₂; Aquaculture chlorine; Sulfurous Acid for spring 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR's for any groups?; Aqueous potassium silicate for spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, need to make TR sufficiency determination; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR's for any groups? streptomycin petition (with HA); Sodium carbonate peroxyhydrate for Spring 2014 (Sunset 2015), waiting on TR; aquaculture guidance/standards for plants.

Agenda

- Approve agenda
- Approve notes of Crops Subcommittee meeting on June 4, 2013
- Streptomycin – draft checklist/recommendation(HA/ZS)
- Aquaculture Materials – progress report (draft checklists)
 - Aquaculture-Vitamins (CBe)
 - Aquaculture-Lignin Sulfonate (JFo/CBe)
 - Aquaculture-Micronutrients (CBe/JFo)
- Assign petitioned material: Addition of laminarin to section 205.601 of the National List. Please think about volunteering to lead the CS on this. See email from Lisa Brines, dated June 4, 2013
- Magnesium oxide petition – discuss recommended proposal (FT)
- Contaminants in farm inputs document/proposed plan - update (JFe) Redrafted outline with timeframes.
- Inerts update (JFe/ZS)
- Adjourn

Discussion

- The agenda was approved as is
- The June 4, 2013 Subcommittee meeting notes were approved with a change to the text in points a and b as some of the information about CO₂ was included in the section about chlorine.
- Streptomycin – draft checklist/recommendation (HA/ZS). The members discussed the edits to the draft checklist and proposal including the addition of an introduction and a comparison between tetracycline and streptomycin. Members noted that because the two materials are similar, the proposals would be similar, in that it will have a majority and minority opinion. The group discussed the similarities and differences between the two substances, noting that the main differences include; modes of action, behavior in the soil, registration and time of usage. Streptomycin is used as curative (post infection), while tetracycline is used as preventative (pre-infection). Additionally, streptomycin can be used well into the growing season, and in human use, streptomycin is injected which provides a much higher dosage than when it is administered orally. A member noted one study from Austria that found residue on fruit but in this instance, the substance was applied close to harvest, and no farming practices were included in the study. The members also discussed various questions on the checklist such as environmental contamination which the 2011 TR notes is unlikely, breakdown of the product, which the EPA notes as harmful to algae. In general there are no field studies, only lab studies, and results are contradictory. As for geographic considerations, there are isolated pockets of strep resistance in Pacific North West in apples and pears and in the North East the temperature and precipitation regime is such that strep is primary treatment for fireblight. A member offered to update the group prior to the next call about some new research results. The chair suggested framing this proposal differently than the tetracycline one decided that compiling one document with a side by side comparison of the majority and minority opinions would make it easier for the reader. As an aside, members discussed some anecdotal data from CA growers regarding the use of Blossom Protect which they found was not effective, while results from the Pacific Northwest were mixed. Also, research trials with copper seem to have been successful but yeast treatments have not.

- Aquaculture Materials – progress report (draft checklists)
 - Aquaculture-Vitamins (CBe). The petitioners are requesting approval of only three vitamins, including: B1 (Thiamine); B12 (Choline) & H (Biotin & B7) as these are the only ones required to be supplemented. The petition was found sufficient. CBo requested that the checklist be reworked with references other than solely from the petition.
 - Aquaculture-Micronutrients for Aquatic Plants (CBe/JFo). The lead reviewer discussed information gleaned from the petition, the 2010 TR, and follow up conversations with the AWG. All trace elements are used in extremely small quantities. The partial list of micronutrients included in the petition are identified as the most useful and necessary; however, the science is relatively new and the petitioner would like to allow for the use of additional micronutrients in the future as new species are discovered. Additionally all micronutrients are allowed in crops with the exception of those made from nitrates or chlorides, and the petitioner is requesting the same allowance (minus the reference made to nitrates/chlorides). Micronutrients are well-known, non-toxic materials although there is no information on how they are manufactured. For more information regarding alternatives, see discussion below, under Lignin Sulfonate. The petition was found sufficient.
 - Aquaculture-Lignin Sulfonate (JFo/CBe). JFo spoke at length with two members of the Aquaculture Working Group (AWG) during which they addressed specific questions that the Subcommittee had posed to the AWG in December. Lignin Sulfonate is an alternative to EDTA, which would not be allowed, but is financially preferable. Chelates are essential in soil systems to take up metals, and a member noted that it's probably more essential in aquatic systems. The amount used in an aquatic system would not persist in an active microbial environment. JFo will redo the checklist using the additional information and will also include some additional scientific info that the AWG sent. JFo also asked the AWG questions about micronutrients. Although only a sample list of micronutrients was provided in the petition the AWG representative noted that 99 % of them are represented. Members discussed several possibilities for adding them to the National List, including the appropriateness of 601(j)(6)(ii) if they included a chloride form. They also discussed creating a relatively closed list so other materials, such as nickel, couldn't be petitioned for use, having a truncated list and using the precedent in 601 to allay concerns and provide for the needs of producers. Members also discussed the manufacturing processes, which are variable; natural forms, which often contain accessory nutrients and require larger quantities and could introduce uncertainty into aquatic systems (which are tightly controlled), and the effectiveness of alternatives which provide chelation in a soil system but don't seem to have the same effect in aquatic systems.
- ZS volunteered to review the newly received petition for the addition of laminarin to section 205.601 of the National List.
- Magnesium oxide petition – discuss recommended proposal (FT) – FT is working on filling out the checklist for discussion on a future call. FT confirmed that there are manufacturing processes that do not use sulfuric acid, and is the case with the petitioner's product.
- Contaminants in farm inputs document/proposed plan – update. JFe redrafted an outline with timeframes, and is working with ZS to further narrow the scope. They are considering two driving provisions in the regulation, and will determine by the next call if they will have a discussion document for the fall meeting.
- Inerts update (JFe/ZS)-The Inerts WG is working with the EPA group - Design on the Environment.
- Adjourn

Future Call Schedule:

June 4, 2013 2:00 ET

Aquaculture-Chlorine (CBo)
Magnesium oxide (FT)

June 18, 2013 2:00 ET

Laminarin Assignment
Aquaculture-Vitamins (CBe)
Aquaculture-Lignin Sulfonate (JFo/CBe)
Aquaculture-Micronutrients (CBe/JFo)
Streptomycin (ZS/HA)

July 2, 2013 2:00 ET

Streptomycin (ZS/HA)
Aquaculture-Lignin Sulfonate (JFo/CBe) review of cklis
Aquaculture-Micronutrients (CBe/JFo) review of cklis

July 16, 2013 2:00 ET

AWG if needed

August 6, 2013 2:00 ET

August 20, 2013 2:00 ET

September 3, 2013 2:00 ET

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Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	
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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 July 2, 2013 2:00 pm ET**

Present: Jay Feldman (Chair) (JFe), Nick Maravell (NM) (Vice Chair), Harold Austin (HA), John Foster (JFo), Zea Sonnabend (ZS), Francis Thicke (FT), Mac Stone (MS), Carmela Beck (CBe)

Absent: Colehour Bondera (CBo)

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production

Substance	Contact	TR requested?	Notes*	Vote	Meeting
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Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR No new TR	Original recomm Nov 2007 Request for TR 02 14 13		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 Request for TR 02 14 13		Fall 2013/Spr 2014

Petitioned Substances

Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal. List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13-07 02 13 - readying questions for contractor.		Fall 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13		Fall 2013

Petitioned Substances					
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.		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 11 20 12. TR deemed suff 11 20 12. Sent follow up questions to petitioner and are awaiting answers.		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 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13		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 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.		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. Petition found sufficient 06 18 13		Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested		Fall 2013
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13.		TBD

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013

Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO2; Aquaculture chlorine; Sulfurous Acid for spring 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR’s for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, need to make TR sufficiency determination; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR's for any groups?; streptomycin petition (with HA); Sodium carbonate peroxyhydrate for spring 2014 (Sunset 2015), waiting on TR; aquaculture guidance/standards for plants; laminarin (petition)

Agenda

- Approve agenda
- Approve notes of crops subcommittee meeting on June 18, 2013
- Streptomycin – sufficiency approval (confirm), draft checklist/recommendation (HA/ZS)
- Aquaculture-Lignin Sulfonate Review checklist, timing for action (JFo/CBe)
- Aquaculture-Micronutrients Review checklist, timing for action (CBe/JFo)
- Plan for finishing discussion on Aquaculture-Vitamins (CBe), Chlorine (CBo), CO₂ (CBo)
- Contaminants in farm inputs document/proposed plan - update (JFe) Redrafted outline with ZS.
- Laminarin – timing for determination of petition sufficiency and need for TR. (ZS)
- Magnesium oxide petition – Progress and date for vote (FT)
- Adjourn

Discussion

- MS announced that the fall meeting will be 3 days long, and asked that each of the Subcommittees think about any proposals that may be delayed in case we need to make more time for discussion. The options include the following: eliminate items as they drop off organically, delay aquaculture proposals wholesale until the spring 2014 meeting, or send proposals out for comment but delay voting until the spring 2014 meeting.
- The agenda was approved as is.
- The June 18, 2013 Subcommittee meeting notes were approved as is.
- Streptomycin (HA/ZS). JFe, ZS and HA spoke prior to the call about the streptomycin checklist and opened the discussion to the entire group. The Chair asked that the Subcommittee members add any feedback or comments about the version that was circulated so they can continue to edit and refine the document. Included in this version is language about the differences between tetracycline and strep, as well as a majority and minority opinion. Members also discussed some of the questions on the checklist that resulted in multiple answers (i.e. both yes and no). The petitioner is citing Confidential Business Information, which for now, doesn't matter because they are petitioning it as a synthetic. The petition was deemed sufficient.
- Aquaculture-Lignin Sulfonate (JFo/CBe). Members discussed some additional questions and whether or not they wanted to send them back to the petitioner or just address them in the narrative in the proposal. The group reasserted their prior decision that the petition was sufficient. A member asked about using Lignin Sulfonate in an aquatic environment, and whether or not this was a concern. The general feeling is that this is not an issue as the amounts are minuscule. As for timing, this will likely be ready for the fall meeting even if the group decides to delay the aquaculture petitions until the spring.
- Aquaculture-Micronutrients (CBe/JFo). The AWG is petitioning all micronutrients, and the Subcommittee previously discussed whether or not they could limit or close the list. The group discussed the potential need for a new TR and whether or not there were specific questions that could or needed to be addressed or clarified. JFo, who had several lengthy conversations with members of the AWG, noted that according to the AWG, if the current annotation for soil micronutrients along with selenium is applied to aquaculture, then 99.9% of the micronutrients are accounted for. Further, the AWG asked that if the NOSB chooses to close the list that they please

close it as it is for soils. Members discussed the pros of this approach, which includes the benefit of it already existing in regulatory language. A member asked about residues in water, to which another member replied that the majority of these micronutrients are taken up by the plants and there isn't much left in water. The members also discussed the potential problems of not bounding the list. The Chair asked people to forward any follow up questions to the group.

- Aquaculture - Vitamins (CBe), Chlorine (CBo), CO₂ (CBo) - will discuss these items on the July 16 call.
- Contaminants in farm inputs - update (JFe). JFe redrafted the outline with ZS and will present it on a future call.
- Laminarin (ZS) – not discussed due to time constraints.
- Magnesium oxide petition (FT). The petition was found sufficient and the group discussed some of the information included in the checklist. Magnesium oxide is benign in soil but some manufacturing processes include the use of acids, which is a limiting factor, while other manufacturing processes release CO₂ into air. The Subcommittee did not request a TR for this, and instead asked the manufacturer for some additional information. FT asked for feedback from the members about the checklist as it was his first review.
- Vinasse – The members feel that the TR is not sufficient as it does not address some of the significant questions such as removal, and technical and functional effects. Vinasse is permitted in the Canadian and European standards but there are processes similar to the ones for Vinasse that are not allowed in CN, the EU or the US. Members discussed whether or not this information can be gleaned from the TR contractor. A member suggested that the group can ask the right questions to get the information they need and will work to compile a list of 5 or 6 more questions about chemical changes, and processes. Another member felt that while some of the questions could be addressed in a revised TR, such as residuals, some could not. ZS offered to work with NM to compose the list of questions.
- The meeting was adjourned.

Future Call Schedule:

July 2, 2013 2:00 ET

Streptomycin (ZS/HA)

Aquaculture-Lignin Sulfonate (JFo/CBe) review of cklist

Aquaculture-Micronutrients (CBe/JFo) review of cklist

Plan for finishing discussion on Aquaculture-Vitamins (CBe), Chlorine (CBo), CO₂ (CBo)

Contaminants in farm inputs document/proposed plan - update (JFe)

July 16, 2013 2:00 ET

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Magnesium oxide petition (TF)

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

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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 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13		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 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.		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. Petition found sufficient 06 18 13		Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested		Fall 2013
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13.		TBD

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013

Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO2; Aquaculture chlorine; Sulfurous Acid for spring 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR’s for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, need to make TR sufficiency determination; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR’s for any groups?; streptomycin petition (with HA); Sodium carbonate peroxyhydrate for spring 2014 (Sunset 2015), waiting on TR; laminarin (petition)

Agenda

- Approve agenda
- Approve notes of Crops Subcommittee meeting on July 2, 2013
- Streptomycin - draft recommendation, schedule vote. (HA/ZS)
- Aquaculture-Lignin Sulfonate review, final with footnote containing answers to CS questions sent to AWG? TR update? (JFo/CBe)
- Aquaculture-Micronutrients review checklist final? TR update? (CBe/JFo)
- Aquaculture-Vitamins (CBe) – petition sufficient, TR update?, checklist review, schedule vote. (see attached checklist and questions)
- Aquaculture - Chlorine (CBo) - petition & TR sufficient, checklist review, ready to vote?
- Aquaculture-CO2 (CBo) - petition sufficient, no request for TR update, checklist review, ready to vote?
- Contaminants in farm inputs document/proposed plan – vote? (JFe) Redrafted outline with ZS. Approve updated TR questions for vinasse (NM)
- Laminarin –petition sufficiency and need for TR? (ZS)
- Magnesium oxide petition – Update. Vote? (FT)
- Adjourn

Discussion

- Approve agenda – The laminarin discussion was postponed and replaced with research priorities
- The notes of Crops Subcommittee meeting on July 2, 2013 approved with no changes.
- Streptomycin – draft recommendation, schedule vote. (HA/ZS) - HA distributed a new draft document that combined 3 previously separate pieces and noted that the majority and minority opinions isn’t flushed out yet. The majority opinion supports an extension to 2017, and the minority is opposed to an extension and wants it to expire in 2014. The members discussed some specific language in the document that they would like to revise in an effort to present a balanced view. The group discussed including an executive summary which they felt would be helpful when presenting the document at the fall meeting. A member noted that the structure of the new document was much better and would like to include links and info for the public comment. ZS will make some comments on the draft document and forward them to the group.
- Aquaculture-Lignin Sulfonate (JFo/CBe) - The group discussed the need for a new TR and decided that the questions posed just prior to the call were already answered by the petitioner and were already included in the updated checklist that was circulated. A member asked that the phrasing of one of the questions be corrected as it was not quite accurate. The phrase “... may result in periodic and/or episodic discharges of lignin sulfonate” should read “chelated micronutrients”. JFe asked that ZS add that language to the document. The Chair asked that the group read the updated checklist and be prepared to vote.
- Aquaculture-Micronutrients (CBe/JFo) - The group discussed the need for a new TR and whether or not the 2010 TR is adequate. CBe felt that the TR was complete and the other members felt that information gleaned from public comments would be more helpful than a new TR. A member added that if they do not get enough public comment, they will be able to decide at the meeting how to move forward. One member noted his concern about using information about micronutrients in a terrestrial system and applying them to an aquatic system.

- Aquaculture-Vitamins (CBe). MA stated that the Livestock Subcommittee requested a TR for vitamins for aquatic animals and trace minerals. The subcommittee requested a copy of both from the NL manager to see if any useful information could be found in either report that would help inform their evaluation of the vitamins and micronutrients petitions.
- Aquaculture - Chlorine (CBo). CBo asked for more feedback about the draft document. A member had several questions and concerns, and asked that some of the language be changed to include more explanation. For example, there are two distinct uses indicated for chlorine but the information in the checklist does not make the distinction. Another member cautioned that the proposal should focus on the application for this specific use, rather than the “implications as used” as that is too far out of the scope of the petition. One member suggested asking for public comment from the perspective of an aquatic plant producer.
- Aquaculture-CO₂ (CBo). CBo asked for more feedback about the draft document. A member reiterated an earlier concern that the document is not well balanced. The document detailed policy issues and referenced other policies not relevant to the petition. The same member also noted that the references to CO₂ affecting the atmosphere are not accurate and need to be corrected. The group also discussed the inclusion of questions about the pros and cons of polyculture systems, so they can collect public comment. A member noted that although discussion of broader topics of organic and the Board’s responsibilities to the community are valuable, he feels that it shouldn’t delay the review of one material.
- Contaminants in farm inputs document (JFe). The outline was redrafted and circulated but the document is preliminary and written informally and members felt that it was not ready for the fall 2013 meeting.
- Approve updated TR questions for vinasse (NM) – The group has two main lingering questions regarding the definition of synthetic versus non synthetic, and whether or not there is a chemical change during production and what chemicals remain in the final product. The group isn’t sure the TR contractor will be able to answer these questions, but ZS and HA have compiled a list of questions that could help elucidate. JFe will send the questions to the National List Manager.
- Laminarin - postponed
- Magnesium oxide petition - (FT). JFe would like to talk with ZS more about this petition. During the review process, FT contacted the manufacturer for some additional information and although the processing component raised some questions he felt they were not concerning. The group does not feel they need to request a TR.
- Research priorities. MS urged the group to think about potential topics for the research priorities that have developed from the past year’s work, and send them to the Chair who will forward them to the Materials Subcommittee.
- The group chose to add an extra call at 2:00pm ET on July 30.
- Meeting adjourned

Future Call Schedule:

July 16, 2013 2:00 ET

Streptomycin (ZS/HA) –continued discussion of draft proposal
 Aquaculture-Lignin Sulfonate (JFo/CBe) continued discussion/vote?
 Aquaculture-Micronutrients (CBe/JFo) continued discussion/vote?

Aquaculture- plant production Vitamins (B1, B12, H) (CBe) – postponed due to time
 Aquaculture - CO₂- discuss/vote?
 Aquaculture - Chlorine - discuss/vote?
 Magnesium oxide petition (FT) –vote?
 Laminarin - Petition sufficiency/TR request? (ZS) - postponed
 Vinasse - discuss additional questions for Contractor

July 30, 2013 2:00 ET

Streptomycin (ZS/HA) –continued discussion of draft proposal
 Aquaculture-Lignin Sulfonate (JFo/CBe) - vote?
 Aquaculture-Micronutrients (CBe/JFo) - vote?
 Aquaculture- plant production Vitamins (B1, B12, H) (CBe) –discuss need for TR, checklist review, schedule vote
 Aquaculture - CO₂- discuss/vote?
 Aquaculture - Chlorine - discuss/vote?
 Magnesium oxide petition (FT) - vote?
 Laminarin - Petition sufficiency/TR request? (ZS)

August 6, 2013 2:00 ET

Strep info (ZS) – vote?

August 20, 2013 2:00 ET

September 3, 2013 2:00 ET

September 17, 2013 2:00 ET

October 1, 2013 2:00 ET

October 15, 2013 2:00 ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 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 July 30, 2013 2:00 pm ET**

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

Absent: Mac Stone (MS), Carmela Beck (CBe),

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR No new TR	Original recomm Nov 2007 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal. List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13.		Fall 2013
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13		Fall 2013

Petitioned Substances					
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.		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 11 20 12. TR deemed suff 11 20 12. Sent follow up questions to petitioner and are awaiting answers.		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 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13		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 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.		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. Petition found sufficient 06 18 13		Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested		Fall 2013
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition sufficient 07 30 13		TBD

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013

Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
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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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for Fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO2; Aquaculture chlorine; Sulfurous Acid for Spring 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR's for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, waiting on add'l TR question response; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR's for any groups; streptomycin petition (with HA); Sodium carbonate peroxyhydrate for Spring 2014 (Sunset 2015), waiting on TR; laminarin (petition)

Agenda

- Approve agenda
- Approve notes of Crops Subcommittee meeting on July 16, 2013
- Streptomycin - Update/vote? (HA/ZS)
- Aquaculture - Discuss checklists for all the petitioned materials. Mini-report from Maine trip –to be followed by more in depth report (in writing). Voting schedule.
- Laminarin - petition sufficiency, synthetic/nonsynthetic, need for TR? (ZS)
- Magnesium oxide petition – Discussion. Vote? (FT)
- Research Priorities discussion (proposed CS research priorities (JFe): (i) Alternatives to chlorine; (ii) Bioplastic mulch. (iii) other proposals?
- Contaminants in farm inputs document/proposed plan - vote? (JFe)
- Adjourn

Discussion

- Agenda was approved as is
- Notes from the July 16 Crops Subcommittee approved with no changes
- Streptomycin - Update/vote? (HA/ZS) – JFe will work on consolidating several drafts and resend it to HA so he can ready it for a vote for next call.
- Aquaculture - JFe noted that the checklists for the aquaculture materials are nearly finished. JFe gave a mini-report about the Maine trip which will be followed by a more in depth written report. The overall consensus was that the aquaculture trip was very valuable and they gained a lot of insight that will be helpful with the materials review. As for the voting schedule, the CO₂ document needs to be revised and is not ready for voting in its current state. The group discussed the chlorine proposal and the idea of including questions for public comment. In light of that it too may not be ready for voting. JFe will discuss the schedule with the Board chair and report back on the next call. With regard to aquaculture in general a member suggested that the level of comfort people are experiencing centers around the policy and philosophy rather than the specific materials, and feels that the group needs to focus on the specific materials since they are known quantities. The members also discussed various aspects of aquaculture such as carrying capacity, monitoring, and standards which will be part of the Maine report. JFe asked that CBo distribute the documents on CO₂ and chlorine, and include a specific motion or annotation in writing so the members can vote on the next call.
- Laminarin - petition sufficiency, synthetic/nonsynthetic, need for TR? (ZS) – The lead reviewer felt the petition is straightforward and well explained, and the group deemed it sufficient. JFe will send a note to L. Brines indicating their determination. Laminarin is EPA approved and the group discussed the potential need for a TR. A member noted that the chemical reactions involved in the manufacturing process are very basic and based on that would deem this non-synthetic. He also noted that laminarin would be preferable to copper or sulfur. Another member supported this point of view but the Chair disagreed about the determination of non-synthetic and indicated that

he would support asking for a TR to determine this. In support of this he offered to distribute some scientific literature to the group. Another member suggested asking the manufacturer questions to help clarify this issue instead of requesting a TR. ZS offered to search the references to help clarify this issue and will discuss this further.

- Magnesium oxide petition – Discussion. Vote? (FT) – The group discussed the annotation and noted that the petition is for a very specific use so the annotation doesn't need to be complex. FT will edit the document and recirculate it in preparation for vote on the next call.
- Research Priorities discussion (proposed CS research priorities (JFe): (i) Alternatives to chlorine; (ii) Bioplastic mulch. (iii) other proposals? Vote on list/prioritize, amend -deferred to next call.
- Contaminants in farm inputs document/proposed plan - vote? (JFe) - The group briefly discussed the status of this document.
- JFe will contact the Subcommittee members regarding the expectations for completion of proposals (including motion and annotations (if applicable)) so they are ready for voting by the next call.
- The meeting was adjourned.

Future Call Schedule:

July 30, 2013 2:00 ET

Streptomycin (ZS/HA) –continued discussion of draft proposal
Aquaculture-Lignin Sulfonate (JFo/CBe) - vote?
Aquaculture-Micronutrients (CBe/JFo) - vote?
Aquaculture- plant production Vitamins (B1, B12, H) (CBe) - discuss need for TR, checklist review, schedule vote
Aquaculture - CO₂- discuss/vote?
Aquaculture - Chlorine - discuss/vote?
Magnesium oxide petition (FT) - vote?
Laminarin - Petition sufficiency/TR request? (ZS)

August 6, 2013 2:00 ET

Strep info (ZS) – vote?
Aquaculture-Lignin Sulfonate (JFo/CBe) - vote?
Aquaculture-Micronutrients (CBe/JFo) - vote?
Aquaculture-plant production Vitamins (B1, B12, H) (CBe) - discuss need for TR, checklist review, schedule vote
Aquaculture-CO₂-discuss/vote?
Aquaculture-Chlorine - discuss/vote?
Prioritize and vote on Research Priorities list
Magnesium oxide petition (FT) - vote?

August 20, 2013 2:00 ET

September 3, 2013 2:00 ET

September 17, 2013 2:00 ET

October 1, 2013 2:00 ET

October 15, 2013 2:00 ET

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Crops Subcommittee (CS) Meeting Notes
Tuesday August 6, 2013 2:00 pm ET**

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

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

Work plan

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Inert Ingredients					
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Project	Contact	Doc type	Notes*	Vote	Meeting
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JFe: Inerts (with ZS) – request for TR's for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

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ZS: Inerts (with JFe) – request for TR's for any groups?; streptomycin petition (with HA); Sodium carbonate peroxyhydrate for Spring 2014 (Sunset 2015), waiting on TR; laminarin (petition)

Agenda

- Approve agenda
- Approve notes from Crops subcommittee meeting on July 30, 2013
- Streptomycin – review checklist, vote (HA/ZS)
- Aquaculture – Identify materials subcommittee members feel comfortable voting on, circulate updated checklists, discuss need for TRs (attaching Livestock Subcommittee checklist on lignin sulfonate as additional background)
- Magnesium oxide petition – Discussion. Vote. (FT)
- Research Priorities discussion (additional proposal to be distributed before meeting) JFe
- Laminarin –additional thoughts on need for TR from subcommittee members (ZS)
- Contaminants in farm inputs document/proposed plan (JFe)
- Adjourn

Discussion

- Agenda was approved with no changes.
- Notes from the July 30 Crops Subcommittee approved with no changes.
- Streptomycin. The lead reviewer summarized the petition and draft proposal which seeks to extend the expiration date from October 21, 2014 to October 21, 2017 to allow for transition to non-antibiotics methods for fireblight control. The group discussed the two views presented in the draft document, both for and against the extension. In general, proponents feel that the extension is necessary for producers and growers as alternative methods are not consistent or proven effective yet, while opponents cite studies of antibiotic resistance. The groups discussed the discussion section of the proposals and made some edits to the language therein, which includes the resolution as stated below. HA will take retain version control and JFe can make edits and send to HA.

Vote on streptomycin:

5 y, 3 n, 0 absent

Motion: To remove existing expiration date of October 21, 2014 and replace it with an expiration date of October 21, 2017 for streptomycin for use in control of fireblight in apples and pears.

Motion by: HA

Seconded by: ZS

Discussion: none

Yes: 5 No: 3 Abstain: 0 absent: 0 Recuse: 0 Two absent members voted via email and the vote tally was adjusted to reflect this.

Resolution: The National Organic Standards Board is committed to the phase out of this material. Between now and 2017 the Board urges growers and certifiers to include in organic systems plans an annual increase in the extent and/or number of alternative practices and materials that are trialed for controlling fire blight. In addition, the board strongly advocates to USDA a high priority for increased support for research into these alternative practices and materials.

Discussion: the group discussed the need to vote on this resolution and SJK felt that it is part of the majority position and does not warrant a separate vote. However, the members felt they wanted to vote separately.

Motion by: HA

Seconded by: ZS

Discussion: none

Yes: 8 No: 0 Abstain: 0 absent: 0 Recuse: 0

- Magnesium oxide. – The group discussed the language in the draft proposal which included a very specific annotation. A member noted that annotations that are stringent have not historically been helpful, and if there is a reason to tighten the language that's fine, but in this case it doesn't seem necessary. The group reviewed the proposal and moved to vote.

Vote on Magnesium Oxide

Motion: To classify Magnesium Oxide as petitioned as synthetic

Motion by: FT

Seconded by: CBo

Discussion: A member suggested adding the phrase "as petitioned" to the motion

Yes: 8 No: 0 Abstain: 0 absent: 0 Recuse: 0

Motion to add Magnesium Oxide to §205.601 with the following annotation: For use only to control the viscosity of a clay suspension agent for humates."

Motion by: FT

Seconded by: ZS

Discussion: Members discussed and chose to remove the term "finely ground"

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

- The remainder of the agenda items were deferred to the August 20 call due to time
- Meeting was adjourned

Future Call Schedule:

August 6, 2013 2:00 ET

Streptomycin –confirm changes to proposal?

Aquaculture-Lignin Sulfonate (JFo/CBe) - vote?

Aquaculture-Micronutrients (CBe/JFo) - vote?

Aquaculture-plant production Vitamins (B1, B12, H) (CBe) - discuss need for TR, checklist review, schedule vote

Aquaculture-CO₂-discuss/vote?

Aquaculture-Chlorine - discuss/vote?

Research Priorities discussion

Laminarin –additional thoughts on need for TR from subcommittee members (ZS)

Contaminants in farm inputs document/proposed plan (JFe)

August 20, 2013 2:00 ET

September 3, 2013 2:00 ET

September 17, 2013 2:00 ET

October 1, 2013 2:00 ET

October 15, 2013 2:00 ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 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 August 20, 2013 2:00 pm ET**

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

Absent: none

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR No new TR	Original recomm Nov 2007 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR received 08 14 13. Sufficiency due 10 14 13		Summary-Fall 2013/Proposal-Spring 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13		Spring 2014
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13	08 06 13	Fall 2013

Petitioned Substances					
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.	Tabled 08 26 13	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 11 20 12. TR deemed suff 11 20 12. Aquaculture TR deemed unnecessary. Sent follow up questions to petitioner. Response deemed sufficient..	Tabled 08 26 13	Fall 2013
Aquaculture-Micronutrients List at §205.609	CBe/JFo	2010 TR (Nickel) 6/2013 Minerals TR	Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12? CS sent request to NL Mgr 12 04 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13. TR deemed unnecessary.	Tabled 08 26 13	Fall 2013
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 Crops TR 7/2013 TR Aquatic Animals TR	Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12. CS sent request to NL Mgr 12 04 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.	Tabled 08 26 13	Fall 2013
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe	4/2013 Aquatic Animals TR	Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12. Petition found sufficient 06 18 13	Tabled 08 26 13	Fall 2013
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested	08 06 13	Fall 2013
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13		TBD
Carbon monoxide (exhaust gas) List at §205.601			Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition suffic		

Petitioned Substances					
			due 04 23 13. Deemed insufficient?		

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for Fall 2013 NOSB meeting:

HA: streptomycin petition (with ZS).

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

CBo: Aquaculture CO₂; Aquaculture chlorine; Sulfurous Acid for Spring 2014 (Sunset 2015), waiting on TR.

FT: Magnesium oxide.

JFe: Inerts (with ZS) – request for TR's for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), waiting on TR; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, waiting on add'l TR question response; Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – request for TR's for any groups? streptomycin petition (with HA); Sodium carbonate peroxyhydrate for Spring 2014 (Sunset 2015), waiting on TR; laminarin (petition)

Agenda

- Approve agenda
- Approve notes from the August 6 Crops Subcommittee meeting
- Streptomycin and magnesium oxide – complete voting.
- Decision/vote on petitions for plant aquaculture materials:
- Aquaculture-Lignin Sulfonate (JFo/CBe)
- Aquaculture-Micronutrients (CBe/JFo)
- Aquaculture-Vitamins (CBe)
- Aquaculture- Chlorine (CBo)
- Aquaculture- CO₂ (CBo)
- Research Priorities discussion (JFe)
- Laminarin –additional thoughts on need for TR from subcommittee members (ZS)
- Contaminants in farm inputs document/proposed plan (JFe)
- Adjourn

Discussion

- Agenda was approved as is.
- Notes from the August 6 Crops Subcommittee approved with a correction to the annotation for Magnesium Oxide and additional votes for MgO and Streptomycin issued via email added to the tally. **ABS Note:** CO was added back onto the workplan table above as per JFe. It was mistakenly removed after the spring meeting although the review process was not complete.
- **Streptomycin and magnesium oxide** - A correction to the annotation for Magnesium Oxide and additional votes for MgO and Streptomycin issued via email added to the tally.
- **Decision/vote on petitions for plant aquaculture materials:** The group discussed the sense of the Subcommittee's readiness with regard to voting on the aquaculture materials, and whether or not they felt they needed more discussion. Opinions were mixed - some felt they would prefer to wait until the regulation was released, and some felt ready based on the past discussions and prepared

documents. The chair felt strongly that the Subcommittee should proceed to vote, and produce proposals reflecting the various points of view.

- **Aquaculture-Lignin Sulfonate (JFo/CBe)** - JFo noted that no one submitted any other changes over the last two weeks via email as requested. The Chair suggested including a minority opinion but members and the NOP felt this was straightforward and did not warrant a minority opinion. The proposed action is to add it to the list. The group discussed restructuring the summary of the document and made some minor edits to the text. The motion was brought to the table for a vote, but after further discussion the vote was deferred to email for lack of time.

Vote on lignin sulfonate – (Withdrawn and tabled August 26, 2013)

Motion to add lignin sulfonate to §205.609 for use as a chelating agent for aquatic micronutrients used in organic aquatic crop production environments.

Motion by: JFo

Seconded by: HA

Discussion: The Chair asked if the group would accept an amendment to the motion as follows: "To be used in a closed system not to be discharged into a natural body of water". A member noted that there is no way to verify such a thing so doesn't feel an annotation should be included as it is over prescriptive. The Chair noted that the practice is already employed in some aquaculture facilities, to which the previous member reiterated the lack of need for it to be included in an annotation. Opinions were mixed: some felt the annotation was redundant and some felt it didn't matter if it was included. Another member noted that without some of these materials we will not have an aquaculture industry and we are limited to imported aquaculture, and felt it was important to vote. The Chair took a straw vote, as noted below, and will recirculate the documents via email and ask that people vote or send in further feedback, acknowledging that many members feel uncomfortable casting votes without further discussion.

Straw vote:

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

Votes cast via email: 08 20 13: HA – Y,

ABS NOTE August 26, 2013: After discussions via email the Subcommittee members chose to table the lignin sulfonate proposal and as such the motion was withdrawn by JFo and HA on August 26, 2013 (See below.)

- **Aquaculture-Micronutrients (CBe/JFo)** – The Chair proposed an annotation as follows: "Those made from nitrates are not allowed."

Vote on Micronutrients: not completed.

Motion to add micronutrients (*Iron, copper, zinc, cobalt, manganese, molybdenum*) to §205.609 of the National List. Those made from nitrates not allowed.

Motion by: CBe

Seconded by: ?

Further discussion: The members discussed further the potential to vote on the aquaculture materials via email, and The Chair feels that the 3 proposals, Micronutrients,

Vitamins and Lignin Sulfonate are very similar, and would like to add the same minority opinion to all and circulate them via email for a vote.

Straw vote:

Yes: 5 No: 2 Abstain: 1 Absent: 0 Recuse: 0

- **Aquaculture-Vitamins (CBe)** - deferred
- **Aquaculture- Chlorine (CBo)** - - deferred
- **Aquaculture- CO2 (CBo)** - deferred
- **Research Priorities discussion (JFe)** - not discussed
- **Laminarin –additional thoughts on need for TR from subcommittee members (ZS)** – not discussed
- **Contaminants in farm inputs document/proposed plan (JFe)** – not discussed
- **Meeting was adjourned**

ABS NOTE August 27, 2013. After further deliberation, the Crops Subcommittee voted to table the vote on the aquaculture proposals until the Spring 2014 meeting:

Motion: To table the 5 plant aquaculture petitions (lignin sulfonate, vitamins, micronutrients, CO2, and chlorine):

Motion by: HA (via email 8 23 13).

Seconded by: JFo (via email 8 23 13)

Yes: 5 No: 2 Absent: 1 Abstain: 0 Recuse: 0

Future Call Schedule:

August 6, 2013 2:00 ET

Streptomycin –confirm changes to proposal?

Aquaculture-Lignin Sulfonate (JFo/CBe) - vote?

Aquaculture-Micronutrients (CBe/JFo) - vote?

Aquaculture-plant production Vitamins (B1, B12, H) (CBe) - discuss need for TR, checklist review, schedule vote

Aquaculture-CO₂-discuss/vote?

Aquaculture-Chlorine - discuss/vote?

Research Priorities discussion

Laminarin –additional thoughts on need for TR from subcommittee members (ZS)

Contaminants in farm inputs document/proposed plan (JFe)

August 20, 2013 2:00 ET

Aquaculture-Lignin Sulfonate (JFo/CBe) - vote? - not completed

Aquaculture-Micronutrients (CBe/JFo) - vote? - not completed

Aquaculture-plant production Vitamins (B1, B12, H) (CBe) - discuss need for TR, checklist review, schedule vote - not completed

Aquaculture-CO₂-discuss/vote? - not completed

Aquaculture-Chlorine - discuss/vote? - not completed

Research Priorities discussion - deferred

September 3, 2013 2:00 ET

Workplans

September 17, 2013 2:00 ET

October 1, 2013 2:00 ET

October 15, 2013 2:00 ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 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 September 3, 2013 2:00 pm ET**

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

Absent: none

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR	Original recomm Nov 2007 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR received 08 14 13. Sufficiency due 10 14 13		Summary-Fall 2013/Proposal-Spring 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13		Spring 2014
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13	08 06 13	Fall 2013

Petitioned Substances					
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.		Spring 2014
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 11 20 12. TR deemed suff 11 20 12. Aquaculture TR deemed unnecessary. Sent follow up questions to petitioner. Response deemed sufficient.		Spring 2014
Aquaculture-Micronutrients List at §205.609	CBe/JFo	2010 TR (Nickel) 6/2013 Minerals TR	Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12? CS sent request to NL Mgr 12 04 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13. TR deemed unnecessary.		Spring 2014
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 Crops TR 7/2013 TR Aquatic Animals TR	Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12. CS sent request to NL Mgr 12 04 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.		Spring 2014
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe	4/2013 Aquatic Animals TR	Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12. Petition found sufficient 06 18 13		Spring 2014
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested	08 06 13	Fall 2013
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13		Spring 2014
Carbon monoxide (exhaust gas) List at §205.601			Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition suffic		

Petitioned Substances					
			due 04 23 13. Deemed insufficient? Waiting on CS action based on EPA feedback and addendum from petitioner		

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	

Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for Spring 2014 NOSB meeting:

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

CBo: Aquaculture CO2; Aquaculture chlorine; Sulfurous Acid for Spring 2014 (Sunset 2015), waiting on TR.

JFe: Inerts (with ZS) – request for TR's for any groups?; Aqueous potassium silicate for Spring 2014 (Sunset 2015), TR sufficiency; Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo);

contamination issues in farm inputs.

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – Sodium carbonate peroxyhydrate for spring 2014 (Sunset 2015), waiting on TR; laminarin (petition)

Agenda

- Approve agenda
- Approve notes of Crops Subcommittee meeting on August 20, 2013
- Workplan for spring 2014 NOSB meeting.
- Status of checklists for the following:
 - Aquaculture-Lignin Sulfonate (JFo/CBe)
 - Aquaculture-Micronutrients (CBe/JFo)
 - Aquaculture-Vitamins (CBe)
- Discuss checklists/perspectives. Set deadline for completion and date for vote.
 - Aquaculture- Chlorine (? to write majority view)
 - Aquaculture- CO2 (? to write majority view)
- Future meetings: Sept 17, Oct 1, Oct 15 (last meeting before NOSB mtg), and beyond.
 - Schedule the following:
 - Review of public comments on strep and magnesium oxide
 - **Sunsets: will schedule after fall meeting**
 - Aqueous potassium silicate
 - Sodium carbonate peroxyhydrate
 - Sulfurous Acid
 - **Petitions:**
 - Laminarin - circulated disc points via email prior to call.
 - Vinasse - NM will review revisions and feedback
 - Carbon monoxide?
 - **Other issues:**
 - Contaminants in farm inputs document/proposed plan (JFe)
 - Inerts
- Adjourn

Discussion

- Agenda approved as is
- Notes of Crops Subcommittee meeting on August 20, 2013 approved as amended by chair prior to the call.
- Workplan for Spring 2014 NOSB meeting - There were several items from the Fall 2013 workplan that will be moved to the Spring 2014 workplan: Three sunset materials; aqueous potassium silicate, for which there was a TR requested; Vinasse for which a revised TR was received on August 20; Laminarin, which is under review and no TR will be requested. Carbon monoxide (CO), which was previously mistakenly removed from the workplan, was added back in to table above. The Subcommittee needs to review the feedback from the EPA and the addendum from the petitioner and make a determination. Inerts will be updated at the spring 2014 meeting as well as Contamination Issues in Farm Inputs.

- MS noted that the Subcommittee makeup and size may change for the fall, which the Chair will take into account for the workload.
- MS indicated that it might be useful to have a seminar series on the Crops calls about aquaculture, much like the Livestock Subcommittee did. He offered to contact several USDA organizations, including the Aquaculture working group and National Institute of Food and Agriculture (NIFA) to ask for recommendations for speakers. A member noted that it would be helpful to hear from an algae specialist. Another member added that it might be helpful to get speakers to speak to both sides of the argument, but the Board Chair felt it was more important to hear from the people that can describe the system. The group would like to invite speakers to the September 17 and October 1 calls and perhaps have some discussion at the fall meeting. They also would like to have Mark Bradley summarize his perspective about the aquaculture rule. MS will circulate the list of speaker suggestions for the group to provide feedback.
- ZS noted that there are two 2016 sunsets that need to be added to the table, which MA will do.
- The group discussed the status of the checklists for the following aquaculture materials: Lignin Sulfonate (JFo/CBe), Micronutrients, Vitamins (CBe), Chlorine, and CO₂. Several members indicated that the checklists are complete but feel that more discussion is needed, which is why they were delayed to the spring 2014 meeting. The Chair would like to schedule a contextual discussion about all 5 aquaculture materials so the group can discuss the bigger picture and not necessarily the checklists for the individual materials. With regard to Lignin Sulfonate, the chair asked the members about possibly adding an annotation about the type of system (open, closed) if necessary, but will decide that as they proceed.
- The group further discussed conducting a seminar series on aquaculture and the NOP asked the members if the seminar series was likely to alter the minority opinion that was inserted into the draft proposals. JFe noted that having a broader discussion about multi-trophic aquaculture systems would be helpful and would indicate that they've done due diligence, because their decisions are going to impact the aquaculture community. A member felt that this wasn't necessary because the petitions are not systems petitions but are focused only on plant interactions. The NOP emphasized that in order to figure out the next steps they should have a problem statement. The NOP also added that aquatic plants are being certified now and perhaps looking at what certifiers are doing would be helpful. Plants that are and can be certified include such things as kelp, algae, and watercress. On the topic of hydroponics, which is a term that is not well defined, one of the members urged the group to make sure they were defining it the same way because hydroponics and aquatic plant production should not be assumed to be synonymous.
- The meeting was adjourned

Future Call Schedule:

August 20, 2013 2:00 ET

Aquaculture-Lignin Sulfonate (JFo/CBe) - vote? - not completed

Aquaculture-Micronutrients (CBe/JFo) - vote? - not completed

Aquaculture-plant production Vitamins (B1, B12, H) (CBe) - discuss need for TR, checklist review, schedule vote - not completed

Aquaculture-CO₂-discuss/vote? - not completed

Aquaculture-Chlorine - discuss/vote? - not completed

Research Priorities discussion - deferred

September 3, 2013 2:00 ET

Workplans
 September 17, 2013 2:00 ET
 Laminarin
 October 1, 2013 2:00 ET
 October 15, 2013 2:00 ET

Review public comments on Strep and MgO. ZS, HA, and TF will distribute summaries of the public comment.

Nov 5
 Nov 19

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 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 September 17, 2013 2:00 pm ET**

Present: Jay Feldman (Chair) (JFe), John Foster (JFo), Harold Austin (HA), Zea Sonnabend (ZS), Francis Thicke (FT), Colehour Bondera (CBo), Nick Maravell (NM) (Vice Chair), Mac Stone (MS) - non-voting

Guests: Mark Bradley, NOP and P.B. Ramkrishnan, Quality Certification Services (QCS), Jim Pierce (Oregon Tilth)

Absent: Carmela Beck (CBe)

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	2010 TR	Original recomm May 2009 Request for TR 02 14 13		Summary-Fall 2013/Proposal-Spring 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	2006 TR 09/2013 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR sent to CS 09 16 13		Summary-Fall 2013/Proposal-Spring 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	2003 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR received 08 14 13. Sufficiency due 10 14 13		Summary-Fall 2013/Proposal-Spring 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal List at §205.601	NM	Yes. Expedited, 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. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13		Spring 2014
Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent	08 06 13	Fall 2013

Petitioned Substances					
			to CS 02 28 13. Sufficiency due 04 29 13. Petition found sufficient 07 02 13		
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.		Spring 2014
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 11 20 12. TR deemed suff 11 20 12. Aquaculture TR deemed unnecessary. Sent follow up questions to petitioner. Response deemed sufficient.		Spring 2014
Aquaculture-Micronutrients List at §205.609	CBe/JFo	2010 TR (Nickel) 6/2013 Minerals TR	Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12? CS sent request to NL Mgr 12 04 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13. TR deemed unnecessary.		Spring 2014
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 Crops TR 7/2013 TR Aquatic Animals TR	Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12. CS sent request to NL Mgr 12 04 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.		Spring 2014
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe	4/2013 Aquatic Animals TR	Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12. Petition found sufficient 06 18 13		Spring 2014
Magnesium oxide List at 205.601	FT	2007 Magnesium (HYDR) oxide TR No new TR	Petition sent to CS on 02 14 13. Petition found sufficient 05 21 13. No TR requested	08 06 13	Fall 2013
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13		Spring 2014
Carbon monoxide (exhaust gas) List at §205.601 Petition Addendum			Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13		

Petitioned Substances					
#1 (PDF)			addressing CS's questions. Questions sent back to petitioner; Petition sufficient due 04 23 13. Deemed insufficient? Waiting on CS action based on EPA feedback and addendum from petitioner		

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Agenda

- Approve agenda
- Approve notes of Crops Subcommittee meeting on September 3, 2013
- Guest Speakers
- Adjourn

Discussion

- Agenda was approved as is.
- Approval of notes from Crops Subcommittee meeting on September 3, 2013 was deferred to next call to allow for maximum time for guest participation.
- Mark Bradley gave a brief history of the aquaculture policies and summary of the impending rule. He noted the aquatic plants portion of the rule and what considerations were reviewed when writing the rule. He noted that it was a complex issue and there are challenges associated with fitting the petitioned materials into the existing regulations. Members had several questions for the NOP about aquatic plants and why the NOSB was being asked to review materials if they are already on the National List for other uses. P.B. Ramkrishnan, (Ram), today's guest speaker, answered that even though the materials are on the list, it would be helpful to understand the different systems. The group discussed various aspects of this such as the definition of aquatic plants and the distinction between vascular and non-vascular plants. Ram noted that the 2007 NOSB recommendation uses the term non-vascular plants, which he finds extremely useful. He also noted another critical distinction in the recommendation: the Crops standards apply to materials meant for human consumption. Ram's specialty is algae and he briefed the Board about several aspects of this component: CO₂ use is only important for aquatic plant operations that are high-intensity, and is needed to make them commercially competitive; and algae is grown in raceways, ponds and bioreactors. Ram distinguished between algae grown for human consumption (spirulina and chlorella) and livestock. He indicated that livestock algae did not have to be organic because it would be fed to small fry while they are still below the 5% of finished market weight threshold. He also noted that it could be organically produced.
- A member asked a question about hydroponics since aquatic plants can be produced under the current regulations. Ram clarified that aquatic plants are non-vascular. Some aquatic plants are started in test tubes, then transferred to dishes, flats, and then finally to large reactors or ponds. Some are started and then seeded onto nets and grown in open water.
- The Chair asked a question about nutrient shifts, and Ram referenced a system in Puerto Rico as an example where they are growing tilapia and shrimp in ponds. The water is then used to produce micro algae, which is subsequently harvested for bio fuels. He indicated that the limiting factor in the system is CO₂ where in a pond based system the limiting factor is CO₂ and micronutrients. The NOP asked Ram if he could send some literature about the 3 different algae production systems.
- Members discussed overprescribing their recommendations, when several members felt that it should be a decision left to the certifiers. The Chair added that he would support parameters to help protect integrity.
- The meeting was adjourned.

Future Call Schedule:

September 3, 2013 2:00 ET

Workplans

September 17, 2013 2:00 ET

Guests: Mark Bradley, NOP, Jim Pierce, Oregon Tilth, and P.B. Ramkrishnan, QCS

October 1, 2013 2:00 ET

Guest: Dr. Tidwell, KY State University Aquaculture Program Manager

Laminarin

October 15, 2013 2:00 ET

Guest: Max Mayeaux, USDA-NIFA

Review public comments on Strep and MgO. ZS, HA, and TF will distribute summaries of the public comment.

Nov 5

Nov 19

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
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**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday November 5, 2013 2:00 pm ET**

Present: Jay Feldman (Chair) (JFe) Colehour Bondera (CBo), Carmela Beck (CBe), Zea Sonnabend (ZS), Jean Richardson (JR) - sitting in, Mac Stone (MS) - nonvoting

Absent: Francis Thicke (FT), Harold Austin (HA), John Foster (JFo), Nick Maravell (NM) (Vice Chair)

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

Work plan (Will be replaced with updated version after November Executive Call)

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	2010 TR	Original recomm May 2009 Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13		Summary-Fall 2013/Proposal-Spring 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	2006 TR 09/2013 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR sent to CS 09 16 13. TR suff response due 11 15 13		Summary-Fall 2013/Proposal-Spring 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	2003 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR received 08 14 13. TR Sufficiency due 10 14 13		Summary-Fall 2013/Proposal-Spring 2014

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Substance	Contact	TR requested?	Notes*	Vote	Meeting
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Antibiotics (Streptomycin) proposal. Amend annotation, §205.601	ZS/HA	3/2011 TR 1/2006 TR 10/1995 TAP	Apr 2011 Final Recomm. NOP rcv'd petition but sent back to petitioner for revision. Rcvd revised petition 01 07 13 and sent back again for incompleteness. Revised petition sent to CS 02 28 13. Sufficiency due 04 29	08 06 13	Fall 2013 Meeting cancelled

Petitioned Substances					
			13. Petition found sufficient 07 02 13		
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.		Spring 2014
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 11 20 12. TR deemed suff 11 20 12. Aquaculture TR deemed unnecessary. Sent follow up questions to petitioner. Response deemed sufficient.		Spring 2014
Aquaculture-Micronutrients List at §205.609	CBe/JFo	2010 TR (Nickel) 6/2013 Minerals TR	Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12? CS sent request to NL Mgr 12 04 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13. TR deemed unnecessary.		Spring 2014
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 Crops TR 7/2013 TR Aquatic Animals TR	Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12. CS sent request to NL Mgr 12 04 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.		Spring 2014
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe	4/2013 Aquatic Animals TR	Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12. Petition found sufficient 06 18 13		Spring 2014
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Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13		Spring 2014
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Petitioned Substances					
#1 (PDF)			addressing CS's questions. Questions sent back to petitioner; Petition sufficient due 04 23 13. Deemed insufficient? Waiting on CS action based on EPA feedback and addendum from petitioner		

Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	Update Fall 2013 Meeting cancelled
Polyglyceryl phthalate ester of coconut oil fatty acid (inert)			Sent to CS on 06 01 11; Needs petition sufficiency review. On hold.	On hold	
1,1-Difluoroethane (inert)		Yes	On 01 21 11 - Petitioner notified NOP they would like to continue review; Review TR for sufficiency. On hold	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	On hold	
Ethylene DDSA / EDDS (inert)	JFe	Yes	On hold	On hold	
Terpene Polymers (inert)	?	Maybe	On hold	On hold	

Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Mushroom standards			Waiting to comment on rulemaking	On hold	
Food safety			On hold	On hold	
Contamination Issues in Farm Inputs	JFe	DD? White paper?	Will be worked on in discrete components		TBD
Seed Purity	ZS/JFe/CBo	Proposal	GMO is lead. Joint w/Crops.		Fall 2013

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for Spring 2014 NOSB meeting:

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

CBo: Aquaculture CO₂; Aquaculture chlorine; Sulfurous Acid for Spring 2014 (Sunset 2015), TR sufficiency (need vote).

JFe: Inerts (with ZS); Aqueous potassium silicate for Spring 2014 (Sunset 2015), TR sufficiency (need vote);

Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs (need explanation from NOP on requirements of briefing document as distinguished from document CS approved).

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, modified TR sufficiency, Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – Sodium carbonate peroxyhydrate for spring 2014 (Sunset 2015), TR sufficiency (need vote); laminarin (petition), need vote on whether TR is needed.

Agenda

- Approve agenda
- Approve notes of Crops Subcommittee meeting on September 3 and 17, 2013
- Review Workplan for next (Spring 2014?) NOSB meeting, as authorized by NOP
- Status of checklists for the following. What more is needed? Set deadline for completion and date for votes
 - Aquaculture-Lignin Sulfonate (JFo/CBe)
 - Aquaculture-Micronutrients (CBe/JFo)
 - Aquaculture-Vitamins (CBe)
 - Aquaculture- Chlorine (CBo), CO₂ (CBo) captured in checklist
- Other business
 - Schedule the following:
 - Review of public comments to CS (for canceled fall 2013 meeting).
 - Sunsets:
 - Aqueous potassium silicate (review and vote on TR sufficiency)
 - Sodium carbonate peroxyhydrate (review and vote on TR sufficiency)
 - Sulfurous Acid (review and vote on TR sufficiency)
 - Petitions:
 - Laminarin (set vote on need for TR)
 - Vinasse (set vote on revised TR sufficiency, dated 8-16-13)
 - Carbon monoxide: Vote on petition sufficiency, including petition addendum of 2/21/201)
- Other Issues
 - Contaminants in farm inputs document/proposed plan (JFe).
 - Inerts
- Summarize agenda for next meeting.
- Adjourn

Discussion

- Agenda approved as is
- Approval of Crops Subcommittee notes of September 3 and 17, 2013 deferred to next call

- Review Workplan: No new items were added to the workplan
- Status of checklists for the following:
 - Aquaculture-Lignin Sulfonate (JFo/CBe) - JFe will confirm with JFo that the document is in its final form and will not be revised for the Spring 2014 meeting
 - Aquaculture-Micronutrients (CBe/JFo) - CBe will do some minor editing based on public comments.
 - Aquaculture-Vitamins (CBe) - CBe will do some minor editing based on public comments.
 - Aquaculture- Chlorine (CBo) - CBo would like to hear other views so they can be incorporated into the document.
 - The group will discuss these proposals once they are completed.
 - Aquaculture - CO2 (CBo) – A member indicated that this document should include alternate views, which CBo will solicit and incorporate.
 - The group would like to follow up with P.B. Ramkrishnan (Ram) of QCS, who was on the September 17th call, about some documents he said he would forward. The Subcommittee would like to re-invite Jim Tidwell of KSU and Jim Pierce of Oregon Tilth to a future call since they were supposed to be on calls that were cancelled. A member noted that it would be more useful to have the speakers participate before moving forth with the aquaculture proposals.
- Other business
 - The following items were discussed and added to the schedule below:
 - Review of public comments: JFe will circulate the summary of comments with a request to the members to determine if revisions to the fall 2013 proposals need to be made. Scheduled for further discussion on February 4, 2013
 - Sunsets: The following sunset items were added to the January 21 discussion schedule below: Aqueous potassium silicate (review and vote on TR sufficiency), Sodium carbonate peroxyhydrate (review and vote on TR sufficiency), and Sulfurous Acid (review and vote on TR sufficiency)
 - Petitions:
 - Laminarin – The lead reviewer feels a TR is not needed but would like the other members to weigh in. Scheduled to discuss and vote on the need for a TR on December 17, 2013
 - Vinasse - Needs more discussion. ZS will co-review this with NM. Scheduled to vote on TR sufficiency January 21
 - Carbon monoxide - vote on petition sufficiency was scheduled for February 4
- Other issues
 - Contaminants in farm inputs document/proposed plan (JFe). The NOP has asked for a briefing paper and the Chair inquired as to the adequacy of the paper that was adopted by CS and sent to the NOP July 1, 2013. The NOP feels that the document is too broad in scope and would like to see a more discrete list of needs to be addressed. A member noted that the introduction was intentionally written to be broad, but the remainder of the document focuses in on the topics. The group felt that some of the sections will be difficult to articulate at this time, until they can delve deeper into the subject matter. Additionally, the Subcommittee would like to then invite speakers to help define the document better, but was waiting for NOP approval before doing so. SJK asked that ZS rewrite a brief synopsis and send it to her for review.
 - Inerts – No update.
- The review of public comments and discussion of the potential need to revise any of the fall 2013 proposals based on the comments was scheduled for February 4, 2013.

- The workplan table has been updated with the 2014 workplan items and will replace the one above in the next set of notes. Additionally, a 2014 milestone timeline has been added below and will replace the fall 2013 milestones.

Future Call Schedule:

September 17, 2013 2:00 ET

Guests: Mark Bradley, NOP, Jim Pierce, Oregon Tilth, and P.B. Ramkrishnan, QCS

October 1, 2013 2:00 ET (CANCELLED DUE TO GOV'T SHUTDOWN)

Guest: Dr. Tidwell, KY State University Aquaculture Program Manager
Laminarin

October 15, 2013 2:00 ET (CANCELLED DUE TO GOV'T SHUTDOWN)

Guest: Max Mayeaux, USDA-NIFA
Review public comments on Strep and MgO. ZS, HA, and TF will distribute summaries of the public comment.

November 5, 2013 2:00 ET

November 19, 2013 2:00 ET

Jim Tidwell (KSU) –Discuss aquaculture
Vote: TR sufficiency for Aqueous potassium silicate
Vote: TR sufficiency for Sodium carbonate peroxyhydrate

December 3, 2013 2:00 ET

Jim Pierce + additional OTCO expert on plant aquaculture
Vote on TR sufficiency for sulfurous acid

December 17, 2013 2:00 ET

Discuss/Vote: Aquaculture - CO2
Discuss/Vote: Aquaculture - Chlorine
Discuss/Vote on need for TR for Laminarin

January 7, 2014

Discuss/Vote: Aquaculture-Lignin Sulfonate (JFo/CBe)
Discuss/Vote: Aquaculture-Micronutrients (CBe/JFo)
Discuss/Vote: Aquaculture-Vitamins (CBe)

January 21, 2014

Three 2015 sunsets (Aqueous potassium silicate, Sodium carbonate peroxyhydrate, sulfurous acid
TR sufficiency on Vinasse

February 4, 2014

NOSB Training meeting in DC
Determine sufficiency of information and vote on carbon monoxide
Discuss and/or modify any fall 2013 proposals based on public comments

Feb 18, 2013

2016 Sunsets: Assign lead for ferric phosphate and hydrogen chloride, discuss and determine need for TR

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013

NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	CANCELLED
Fall 2013 NOSB Meeting – Louisville, KY	CANCELLED

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Fall 2013 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

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Absent: John Foster (JFo), Nick Maravell (NM) (Vice Chair)

Guest: James Tidwell, Kentucky State University

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
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Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13		Summary: Fall 2013 Review: Spr 2014
2016 Sunsets					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)			Sunset 09 12 16		Summary: Spr 2014 Review: Fall 2014

Hydrogen chloride 205.601(n) CAS # 7647-01-0)			Sunset 09 12 16		Summary: Spr 2014 Review: Fall 2014
Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
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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 11 20 12. TR deemed suff 11 20 12. Aquaculture TR deemed unnecessary. Sent follow up questions to petitioner. Response deemed sufficient.		Proposal Spr 2014
Aquaculture-Micronutrients List at §205.609	CBe/Jfo	2010 TR (Nickel) 6/2013 Minerals TR	Petition sent to CS on 06 08 12. Petition sufficiency response due 08 08 12? CS sent request to NL Mgr 12 04 12 for additional info. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13. TR deemed		Proposal Spr 2014

Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/Cbe	2/2011 Crops TR 7/2013 TR Aquatic Animals TR	Petition sent to CS on 07 03 12. Petition Sufficiency Response due 09 04 12. CS sent request to NL Mgr 12 04 12 for additional info and TR. Questions clarified by petitioner. Petition found sufficient 06 18 13 and 07 02 13.		Proposal Spr 2014
Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	Cbe	4/2013 Aquatic Animals TR	Petition sent to CS 08 10 12. Petition Sufficiency response due 10 10 12. Petition found sufficient 06 18 13		Proposal Spr 2014
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13		Proposal Fall 2014?
Carbon monoxide (exhaust gas) List at §205.601			Petition sent to CS on 06 06 12. Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Waiting on CS action based on EPA feedback and addendum from petitioner		?

Inert Ingredients

Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	?

Other Proposals

Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs	Jfe	DD? White paper?	The NOP requested a summary on 11 05 13 of the briefing paper that the NOSB submitted in July, listing the discrete components that the Subcommittee is proposing to work on. This will shape the future direction of this item.		Fall 2014?

* **Yellow highlight** indicates Subcommittee action needed

Crops Subcommittee work assignments for Spring 2014 NOSB meeting:

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

CBo: Aquaculture CO₂; Aquaculture chlorine; Sulfurous Acid for Spring 2014 (Sunset 2015), TR sufficiency (need vote).

JFe: Inerts (with ZS); Aqueous potassium silicate for Spring 2014 (Sunset 2015), TR sufficiency (need vote); Plant Breeding in conjunction with Ad hoc GMO subcmte (with ZS, CBo); contamination issues in farm inputs (need explanation from NOP on requirements of briefing document as distinguished from document CS approved).

JFo: Aquaculture lignin sulfonate.

NM: Vinasse, modified TR sufficiency, Carbon Monoxide/Exhaust Gas (sent back to petitioner).

ZS: Inerts (with JFe) – Sodium carbonate peroxyhydrate for spring 2014 (Sunset 2015), TR sufficiency (need vote); laminarin (petition), need vote on whether TR is needed.

Agenda

- Approve agenda
- Approve notes of Crops Subcommittee meeting on November 5, 2013
- Guest: Jim Tidwell (KSU) - Discuss aquaculture
- Adjourn

Discussion

- Agenda was approved as is
- Crops Subcommittee notes of September 3 and 17, 2013 were approved via email after the November 5 call.
- Crops notes of November 5 were deferred due to lack of time.
- Guest: Jim Tidwell (KSU). Dr. Tidwell noted that while his primary focus is on pond aquaculture, he has broadened his scope and has recently written a book on aquaculture production systems. The Crops Subcommittee members provided Dr. Tidwell with a list of questions prior to the call and the group spent the remainder of the time discussing such things as: micro-algae and its intersection with animal aquaculture; the differences, similarities, economic incentives, etc between conventional and organic aquaculture; and the interest within the community in becoming certified organic. Dr. Tidwell indicated that the delay in releasing standards and the associated uncertainty have resulted in the loss of interest in becoming certified. Some groups are already certifying sustainability so they have options if they cannot use the "certified organic by USDA", so although there is a demand, it is not clear how much demand there is for that classification. With regard to marketing, a member noted that there is a traceability aspect built into the organic world and asked how this would affect the market. The Crops Chair asked if Dr. Tidwell would be willing to entertain more questions via email or phone. MS asked if we could provide Jim the list of materials under review so he could provide additional information about the specific use of these materials. A member asked when the standards would be available, and the NOP indicated that the USDA is currently working on some language for the preamble to help clarify the intent of the regulation, but does not have a firm date for publication.
- Future calls: ZS noted that she might not be able to participate in the Dec 3 and asked if we could invite Dr. Pierce to a later call instead. On the next call the group will reassign various workplan items, discuss the briefing paper on Contaminants in farm inputs and determine sufficiency of the TR for vinasse.
- TR sufficiency for aqueous potassium silicate (JFe). The members discussed the summary that was circulated via email to the group indicating that the TR did not address two critical aspects: Essentiality and effects on nutrients. A member noted that the TR didn't seem to address the difference between disease control and deficiency in soil, although a previous TR did contain such information. The group

would like to request additional clarifying information from the contractor. JFe and TF will write a list of questions and concerns and will present it on the next call.

- TR sufficiency for sodium carbonate peroxyhydrate was deferred until the next call.
- ZS requested that NOP provide feedback on the Contaminated Farm Inputs workplan item

Future Call Schedule:

November 5, 2013 2:00 ET

November 19, 2013 2:00 ET

Jim Tidwell (KSU) - Discuss aquaculture

Vote: TR sufficiency for aqueous potassium silicate -postponed

Vote: TR sufficiency for Sodium carbonate peroxyhydrate -postponed

December 3, 2013 2:00 ET

Determine TR sufficiency for aqueous potassium silicate (due 10 14 13)

Determine TR sufficiency for vinasse (due 10 20 13)

Determine TR sufficiency for Sodium carbonate peroxyhydrate (due 11 15 13)

Contaminants white paper and response from NOP

Determine TR sufficiency for sulfurous acid (due 12 27 13)

December 17, 2013 2:00 ET

Jim Pierce + additional OTCO expert on plant aquaculture

Discuss/Vote: Aquaculture - CO2

Discuss/Vote: Aquaculture - Chlorine

Discuss/Vote on need for TR for Laminarin

January 7, 2014

Discuss/Vote: Aquaculture-Lignin Sulfonate (JFo/CBe)

Discuss/Vote: Aquaculture-Micronutrients (CBe/JFo)

Discuss/Vote: Aquaculture-Vitamins (CBe)

January 21, 2014

Three 2015 sunsets (Aqueous potassium silicate, Sodium carbonate peroxyhydrate, sulfurous acid)

February 4, 2014

NOSB Training meeting in DC

Determine sufficiency of information and vote on carbon monoxide

Discuss and/or modify any fall 2013 proposals based on public comments

Feb 18, 2013

2016 Sunsets: Assign lead for ferric phosphate and hydrogen chloride, discuss and determine need for TR

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Fall 2013 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014

Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

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

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday December 3, 2013 2:00 pm ET**

Present: Jay Feldman (JFe), Colehour Bondera (CBo), Francis Thicke (FT), John Foster (JFo)

Absent: Harold Austin (HA), Carmela Beck (CBe), Zea Sonnabend, Chair (ZS)

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	3/2010 TR	Original recomm May 2009 Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	8/2006 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03		Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
2016 Sunsets					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)			Sunset 09 12 16		Summary: Spr 2014 Review: Fall 2014
Hydrogen chloride 205.601(n) CAS # 7647-01-0)			Sunset 09 12 16		Summary: Spr 2014 Review: Fall 2014

Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal List at §205.601	ZS/NM	Yes. Expedited, modified TR	Petitn sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found sufficient 12 03 13		Proposal Spring 2014
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13		Proposal Fall 2014?
Carbon monoxide (exhaust gas) List at §205.601	FT		Petition sent to CS on 06 06 12Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Waiting on CS action based on EPA feedback and addendum from petitioner		?
Aquaculture-CO₂ , List at §205.609	CBo, ZS	No	Moved to Livestock/Aquaculture Subcommittee workplan		NA
Aquaculture-Chlorine List at §205.609 and §205.611	CBo	No	Moved to Livestock/Aquaculture Subcommittee workplan		NA
Aquaculture-Micronutrients List at §205.609	CBe/JFo	2010 TR (Nickel) 6/2013 Minerals TR	Moved to Livestock/Aquaculture Subcommittee workplan		NA
Aquaculture-Lignin sulfonate (chelating agent for aquatic plants) List at §205.609	JFo/CBe	2/2011 Crops TR 7/2013 TR Aquatic Animals TR	Moved to Livestock/Aquaculture Subcommittee workplan		NA

Aquaculture- plant production Vitamins (B1, B12, H) List at §205.609	CBe	4/2013 Aquatic Animals TR	Moved to Livestock/Aquaculture Subcommittee workplan		NA
Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	?
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs	JFe	DD	The NOP requested a summary on 11 05 13 of the briefing paper that the NOSB submitted in July, listing the discrete components. CS sent summary to NOP 11 06 13. NOP sent response to CS 11 19 13 regarding rescoping doc: Contaminated Inputs Literature Review and Discussion Document		Fall 2014?

* **Yellow highlight** indicates Subcommittee action needed

Agenda

- Approve agenda
- Approve Crops Subcommittee notes of November 5 & 19, 2013
- Appoint a vice chair for the Crops Subcommittee
- Reassign workplan items
- Re-work the future call schedule in light of the aquaculture materials moving to the LS
- Assign Carbon Monoxide (exhaust gas) point person
- Determine TR sufficiency for aqueous potassium silicate (due 10 14 13)
- Determine TR sufficiency for vinasse (due 10 20 13)
- Determine TR sufficiency for sodium carbonate peroxyhydrate (due 11 15 13)
- Determine TR sufficiency for sulfurous acid (due 12 27 13)
- Adjourn
- Contaminants paper and response from NOP

Discussion

- The agenda was approved as is
- Crops Subcommittee notes of November 5, 2013 were approved with no changes.
- Crops Subcommittee notes of November 19, 2013 were approved with no changes.
- ZS, the new Chair of the Crops Subcommittee, appointed FT as Crops Vice Chair

- **Reassign workplan items**
 - FT volunteered to be the lead for Carbon Monoxide (exhaust gas) as NM rotated off of the Subcommittee.
 - Other workplans items were not reassigned.
- **Future call schedule** - MA noted some changes below based on the redistribution of the aquaculture materials to the Livestock/Aquaculture Subcommittee.
- **Aqueous potassium silicate** TR sufficiency - A member noted that he looked at and cited some new literature and felt it would be helpful to seek input from the contractor about the validity and usefulness of the citations. He added that the new research raises questions that the initial TR did not include. ZS will submit the citations to the National List Manager (LB) to refer to the TR contractor. The TR, as is, was not found sufficient.
- **Vinasse** TR sufficiency. The primary question is whether or not vinasse is synthetic or not. A member noted that if it is determined to be synthetic and is used as a fertilizer, then it would be a problem. If it is determined to be natural, then perhaps the review does not need to be conducted. ZS feels it is a fertilizer and noted that it is currently used in formulated products, but since it is typically used in combination with other ingredients most growers do not know they are using it. It's not marketed as a fertilizer but as JFo noted it does have a list of percentages of micronutrients. A member added that it would likely be used as a soil amendment not a fertilizer. The petitioner was asked some additional questions but did not address this or the additives question. The Subcommittee determined that the TR was sufficient and would notify LB of its status so it could be posted on the NOP website.
- **Sodium carbonate peroxyhydrate** TR sufficiency. The Crops Chair noted that there is new research available that was not discussed in the TR and suggested sending it back to the contractor for revision.
- **Sulfurous acid** TR sufficiency. The members concluded that there are some important questions that were not addressed in the new TR. A member noted the word remediation was used in the review of sulfurous acid, and indicated that it would be more honest and useful to frame the argument about sulfurous acid in light of the fact that most of the soil alkalinity problems are from irrigation and not overuse of this substance. Using the term remediation implies pollution, when in fact irrigation is the norm, especially in the Western US. He suggested replacing the term remediation with compensation. The members determined the TR to be insufficient and will send discussion points to ZS who will send them to LB to forward to the TR contractor.
- **Contaminants paper and response from NOP.** The NOP supplied a response to the briefing paper from the Crops Subcommittee asking that the group first compile a list of sources and literature to determine if contaminants in farm inputs is a problem before it goes forth with any other work. A member noted that perhaps the question is a matter of degree and not whether or not there is a problem to begin with. Another member added that there will be differences in degree depending on what aspect is being considered, and advocated a risk assessment approach. A member emphasized the desire for a longer term goal so the document will not linger and a solution or resolution will be evident and transparent. Another member suggested that this would be a great topic for the Research Priorities. The NOP reiterated that they would support a survey of the literature before the group moves forward, as this would be an achievable deliverable for the next NOSB meeting.
- The meeting was adjourned

Future Call Schedule:

November 19, 2013 2:00 ET

Jim Tidwell (KSU) - Discuss aquaculture

Vote: TR sufficiency for aqueous potassium silicate -postponed

Vote: TR sufficiency for Sodium carbonate peroxyhydrate –postponed

December 3, 2013 2:00 ET

- Determine TR sufficiency for aqueous potassium silicate (due 10 14 13). Found insufficient.
- Determine TR sufficiency for vinasse (due 10 20 13). Found sufficient.
- Determine TR sufficiency for sodium carbonate peroxyhydrate (due 11 15 13). Found insufficient.
- Contaminants white paper and response from NOP.
- Determine TR sufficiency for sulfurous acid (due 12 27 13). Found insufficient.

December 17, 2013 2:00 ET

- Reassign workplan items
- Discuss/vote on need for TR for Laminarin
- Discuss Contaminants briefing paper and response from NOP

January 7, 2014

January 21, 2014

- Discuss vinasse checklist

February 4, 2014

- NOSB Training meeting in DC
- Determine sufficiency of information and vote on carbon monoxide
- Discuss and/or modify any fall 2013 proposals based on public comments

Feb 18, 2013

- 2016 Sunsets: Assign lead for ferric phosphate and hydrogen chloride, discuss and determine need for TR

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
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NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

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

**National Organic Standards Board (NOSB)
Crops Subcommittee (CS) Meeting Notes
Tuesday December 17, 2013 2:00 pm ET**

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

Absent: none

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

Work plan

2015 Sunsets - § 205.601 Synthetic substances allowed for use in organic crop production					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Sulfurous Acid at 601(j) Original petition 2008	CBo	Y 10 25 13 3/2010 TR	Original recomm May 2009 Request for TR 02 14 13 TR sent to CS on 10 25 13 TR suff response due 12 27 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
Sodium carbonate peroxyhydrate at 601(a) Original petition 2006	ZS	Y 02 14 13 8/2006 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR sent to CS 09 16 13. TR sufficiency due 11 15 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
Aqueous potassium silicate at 601(e) and 601(i) Original petitions: 2004 , 2006	JFe?	Y 02 14 13 9/2003 TR	Original recomm Nov 2007 Request for TR 02 14 13. TR received 08 14 13. TR sufficiency due 10 14 13. TR found insufficient. Submitted additional questions for TR contractor 12 03 13		Summary: Spr 2014 Review: Fall 2014
2016 Sunsets					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Ferric phosphate 205.601(h) CAS # 10045-86-0)	CBe	2004 TAP 2010 TR 2012 TR Supp	Sunset Date: 09 12 16 2003 Petition to add to 205.601 2003 Petition supplement 2005 NOSB rec (passed) 2009 Petition to remove from 205.601(h) 2012 NOSB rec (failed)		Summary: Spr 2014 Review: Fall 2014

Hydrogen chloride 205.601(n) CAS # 7647-01-0	JFo	2003 TAP	Sunset Date: 09 12 16. Used to de-lint cotton post harvest. 2002 Petition NOSB rec		Summary: Spr 2014 Review: Fall 2014
Petitioned Substances					
Substance	Contact	TR requested?	Notes*	Vote	Meeting
Vinasse - proposal List at \$205.601	ZS/NM	Yes. 08 13 13 Expedited, modified TR	Petitrn sent to CS on 03 29 12. Sent request for feedback on feasibility for modif TR to LBrines. LB sent feedback 09 04 12. The CS reqst'd a quick modified TR 12 04 12. TR sent to CS 04 29 13. Sufficiency due 06 28 13. Additional questions for contractor sent to LB 07 16 13. Revised TR sent to CS 08 20 13. TR Suff due 10 20 13. TR found sufficient 12 03 13	Classification vote: 12 17 13	Proposal Spring 2014
Laminarin List at 205.601	ZS		Petition sent to CS on 06 03 13. Sufficiency response due 08 02 13. Petition found sufficient 07 30 13		Proposal Fall 2014?
Carbon monoxide (exhaust gas) List at \$205.601	FT		Petition sent to CS on 06 06 12Petition deemed insufficient 12 04 12. Petition revised and sent to CS 2 22 13. Revised Petition Sufficiency Review; Rcv'd info from EPA 03 07 13 addressing CS's questions. Questions sent back to petitioner; Petition sufficiency due ASAP. Waiting on CS action based on EPA feedback and addendum from petitioner		TBD
Inert Ingredients					
Substance	Contact	TR reqtd?	Notes*	Vote	Meeting
Inerts update	JFe/ZS	N/A	Inerts - Review priority inerts, complete groupings, exact number to be determined	NA	?
Other Proposals					
Project	Contact	Doc type	Notes*	Vote	Meeting
Contamination Issues in Farm Inputs Literature Review	JFe	DD	NOP rqstd summary on 11 05 13 of the briefing paper that the NOSB submitted in July. CS sent summary to NOP 11 06 13. NOP response sent 11 19 13 regarding rescoping discussion document. NOP approved addition to workplan as described in NOP response.		Fall 2014?

* **Yellow highlight** indicates Subcommittee action needed

Agenda

- Approve agenda
- Approve Crops Subcommittee notes of December 3, 2013
- Reassign workplan items
- Discuss/vote on need for TR for Laminarin
- Discuss Contaminants briefing paper and response from NOP
- Adjourn

Discussion

- The agenda was approved as is
- Crops Subcommittee notes of December 3, 2013 were approved without changes.
- Reassign workplan items
 - 2016 sunsets: CBe will review ferric phosphate and JFo will review hydrogen chloride
 - The Subcommittee rescheduled discussion items (below) since there were no items scheduled for January 7. The discussion for petition sufficiency of carbon monoxide was moved from Feb 4th to January 21.
 - MA removed aquaculture material from table above and made some other minor changes to links.
- Discuss/vote on need for TR for Laminarin. The lead reviewer found the petition to be sufficient and pointed out that laminarin is produced through an acid/base extraction method which is allowed. This is very different from acid extraction, as was noted in a background info document that was circulated to the members. Since this is a naturally occurring extract she feels its use should be encouraged in organic agriculture. The group discussed the limitations of using the draft classification guidance to determine if laminarin is synthetic or non-synthetic. The description of the extraction process indicates that the acid used has no technical or functional effect on laminarin, so effectively it is a processing aid. A member noted that the situation is complicated by the fact that the word extraction is not well defined. The majority of members came to agreement about the classification of laminarin and the group chose to proceed to vote, but to seek input from the NOP about how to move forward. SJK will seek information and report back to the group ASAP. A member supported a request for a TR while several others did not, noting that if laminarin is determined to be synthetic, then there is no need for a TR. ZS gave an example from OMRI about listing pyrethrum without mentioning the extractants used.

Vote on Laminarin:

Motion to classify laminarin as petitioned as non-synthetic:

Motion by: ZS

Seconded by: HA

Discussion: A member noted that the petitioner listed laminarin as synthetic, which the CS Chair noted was a requirement.

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

SJK will follow up with group about how to proceed.

- Discuss Contaminants briefing paper and response from NOP. ZS noted agreement with most of the items in the NOPs response document, with the exception of two things: 1) the request that this document be a literature review only, as she feels it will be more useful and productive as a discussion document. To support this work, the Subcommittee would like to invite guest speakers to discuss this and help identify key issues. The NOP supports this request. 2) The group would like to include other sources of contamination and not limit it to pesticide residues. The NOP response document supports this request. MA added this to the workplan, with JFe as the point person. JFe will identify and schedule guest speakers.

- The meeting was adjourned

Future Call Schedule:

December 3, 2013 2:00 ET

- Determine TR sufficiency for aqueous potassium silicate (due 10 14 13). Found insufficient.
- Determine TR sufficiency for vinasse (due 10 20 13). Found sufficient.
- Determine TR sufficiency for sodium carbonate peroxyhydrate (due 11 15 13). Found insufficient.
- Contaminants white paper and response from NOP.
- Determine TR sufficiency for sulfurous acid (due 12 27 13). Found insufficient.

December 17, 2013 2:00 ET

- Reassign workplan items
- Discuss/vote on need for TR for Laminarin
- Discuss Contaminants briefing paper and response from NOP

January 7, 2014 2:00 ET

- Discuss vinasse checklist
- Ferric phosphate TR determination
- Hydrogen chloride TR determination
- Discuss public comment for two fall 2013 proposals

January 21, 2014 2:00 ET

- Determine petition sufficiency of information and vote on carbon monoxide

February 4, 2014 2:00 ET

- NOSB Training meeting in DC
- Discuss and/or modify any fall 2013 proposals based on public comments

Feb 18, 2013 2:00 ET

- 2016 Sunsets: Assign lead for ferric phosphate and hydrogen chloride, discuss and determine need for TR

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
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