

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)  
Handling Subcommittee (HS) Meeting Notes  
Wednesday, January 9, 2013, 1:00 pm EST**

**Present:** John Foster (Chair) (JFo), Zea Sonnabend (ZS), Carmela Beck (CBe), Mac Stone (MS) - sitting in, Tracy Favre (TF), Joe Dickson (JD), Nick Maravell (NM)

**Absent:** Jean Richardson (JR), Harold Austin (Vice-Chair) (HA)

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a>	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013		Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07 25 12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605 (b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB recc</a> <a href="#">2006 Formal NOSB recc</a>
<a href="#">Sodium gluconate</a>	205.605	JD	Yes	No	On hold		Petition sent to HS on 3/22/2011; for use in soap; TR Requested 11/15/2011. On hold, for cosmetic use.
<a href="#">Bergamot Bitter Orange Powder</a>	205.606	TF	Yes	<a href="#">Yes</a>	On hold		Sent to HS on 3/22/2011; TR Requested 5/23/11; sent to contractor on 10/27/11. TR sent to HS on 2/16; Updated TR sent to HS 04 30 12. TR posted 06/25/12. On hold.
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	205.605	JR	No	NA	Fall 2013		<a href="#">2000 petition</a> , <a href="#">2001 Recommendation</a> , <a href="#">2001 TAP</a> , <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested
<a href="#">Glycerin</a>	removal from 205.605	TF	<a href="#">199</a> <a href="#">5 TR</a>		?		Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13
Sunset 2015 - Status of current review process							
Name	CAS #	Rvwr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name	Rvwr	Meeting	Vote	Notes*			
<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>	ZS	Spr 2013		Proposal spring 2013.			

\* Highlight indicates committee action needed.

### **Agenda**

- Approve notes from December 18, 2012
- Discuss/vote on sulfuric acid proposal (JD)
- Continue discussion of ammonium hydroxide checklist (JR)
- Discuss Glycerin petition
- Continue discussion on auxiliary/"other" ingredients (ZS)
- Discuss sunset 2015 materials and next steps

### **Discussion**

- Notes from December 18, 2012 were approved with no changes.
- Sulfuric Acid –based on the previous discussion the checklist was completed and an introduction was added. The group weighed the environmental impacts of the production of the material vs. usage of material to produce a seaweed extract, and felt that the due to the limited scope of the petition it was not possible to determine. The group discussed the fact that a substantial amount of Confidential Business Information (CBI) has been redacted and noted that the TR, was also not able produce any additional information regarding need, alternatives, and whether

use of the substance will result in seaweed extract being classified as synthetic. Without knowing what the resulting product is, the group feels they are not likely to approve this substance.

**Vote on sulfuric acid:**

Motion to classify sulfuric acid as petitioned as synthetic:

Motion by: JD

Seconded by: JFo

No further discussion

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

Motion to list sulfuric acid as petitioned on 205.605 (b)

Motion by: JD

Seconded by: TF

No further discussion

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

The chair will circulate the discussion and voting count to the absent members for an email vote and ask for their response. ABS note: HA and JR voted January 13 via email and the votes above were changed to reflect that.

- Ammonium hydroxide discussion will be delayed until the January 15 call. A formal checklist needs to be completed, including a summary and questions to solicit public comment about the claim in the petition that ammonium hydroxide can be used as a substitute for three other substances on the National List (see petition, item # 12 on page 12).
- The group discussed the addition of glycerin to the workplan (petition to remove from §205.605) and TF volunteered to take the lead for the review. TR will determine petition sufficiency and whether or not a TR is necessary.
- The members discussed the 2015 Sunsets. Tragacanth: 5 years ago there was no concern or question about this material. Gellan gum: the NOP received comments about the manufacturing method so they added an annotation to limit it to high-acyl (deemed nonsynthetic) forms only. Marsala and sherry: it was noted that these items might contain sulfites, which the past NOSB considered but decided to put forth a recommendation without annotation. A member indicated that Marsala can be made organically with a little advanced notice. Another member responded that the determination would be the responsibility of the certifiers and perhaps shouldn't be an NOSB decision, to which another member argued that the NOSB is responsible for determining whether or not there is an organic alternative. EBR noted that the group should look at the previous recommendations to inform their decisions. Lead reviewers were assigned to the sunset materials and are noted in the table above.

**Future Call Schedule:**

December 18, 2012 1:00 EST

Vote on Sugar Beet fiber (JFo/ZS) - done

Vote on Barley Betafiber (JFo) - done

Ammonium hydroxides - discussion delayed to January 9<sup>th</sup> call

Discuss framework for sulfuric acid (JD) -

Discuss gibberellic acid (ZS) - sending back to petitioner for further info, so will be delayed to a later meeting

Continue discussion on auxiliary/"other" ingredients (ZS)

January 9, 2013 1:00 EST

Vote on Sulfuric Acid proposal (JD)

Continue discussion of ammonium hydroxides checklist (JR)  
 Continue discussion on auxiliary/"other" ingredients (ZS)  
 Discuss sunset 2015 materials and next steps

January 15, 2013 1:00 EST

Discuss/vote on DBDMH (JFo)  
 Continue discussion of ammonium hydroxide checklist (JR)  
 Continue discussion on auxiliary/"other" ingredients (ZS)

February 5, 2013 1:00 EST

Final discussion and vote on auxiliary/"other" ingredients

February 19, 2013 1:00 EST

March 5, 2013 1:00 EST

March 19, 2013 1:00 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

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)  
Handling Subcommittee (HS) Meeting Notes  
Wednesday, January 15, 2013, 1:00 pm EST**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Carmela Beck (CBe), Tracy Favre (TF), Nick Maravell (NM)

**Absent:** Jean Richardson (JR), Joe Dickson (JD)

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a>	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013		Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07 25 12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605 (b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB recc</a> <a href="#">2006 Formal NOSB recc</a>
<a href="#">Sodium gluconate</a>	205.605	JD	Yes	No	On hold		Petition sent to HS on 3/22/2011; for use in soap; TR Requested 11/15/2011. On hold, for cosmetic use.
<a href="#">Bergamot Bitter Orange Powder</a>	205.606	TF	Yes	<a href="#">Yes</a>	On hold		Sent to HS on 3/22/2011; TR Requested 5/23/11; sent to contractor on 10/27/11. TR sent to HS on 2/16; Updated TR sent to HS 04 30 12. TR posted 06/25/12. On hold.
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd?	Mtng	Vote?	Notes*
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	205.605	JR	No	NA	Fall 2013		<a href="#">2000 petition</a> , <a href="#">2001 Recommendation</a> , <a href="#">2001 TAP</a> , <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested
<a href="#">Glycerin</a>	removal from 205.605	TF	<a href="#">19</a> <a href="#">95</a> <a href="#">TR</a>		?		Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13
Sunset 2015 - Status of current review process							
Name	CAS #	Rvwr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name	Rvwr	Meeting	Vote	Notes*			
<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>	ZS	Spr 2013		Proposal spring 2013.			

\* Highlight indicates committee action needed.

### **Agenda**

- Approve notes from January 9, 2012
- Discuss/vote on DBDMH (JFo)
- Continue discussion on auxiliary/"other" ingredients (ZS)

### **Discussion**

- Notes from January 9, 2013 were approved with no changes.
- DBDMH is being petitioned as an antimicrobial for beef carcasses. Although the petition was found sufficient, it didn't present a strong argument for essentiality or discuss alternatives. The members discussed potential negative health impacts, and impacts to safe drinking water, neither of which was very clear in the TR. Members also discussed the post-use products of DBDMH and their environmental impact and felt that there was not much support for this material. It was also noted that there are alternative materials available. DBDMH is prohibited in the EU, and not used internationally. The NOP noted that there are a couple of words missing in

the TR on line 368 that have since been added, and the document was reposted on the website. The group also discussed the checklist (an updated version) and noted that there was no summary included. The chair of the Subcommittee will add an introduction as well as a synopsis of the discussion and will recirculate the document via email for voting.

Vote on DBDMH via email on: (ABS note Jan 25: vote will be taken during Jan 29 call instead of via email)

- Auxiliary/"other" ingredients - ZS and the NOP made some edits to various sections of the document including the discussion, baseline criteria, policy and agricultural sections via email and the new document was recirculated to the group for discussion. EBR will also provide some language regarding GRAS (Generally regarded as safe). ZS asked for additional input about the baseline criteria section as well as the last bullet point: materials listed on 605 and 606 are synthetic additives. JFo added that this specific language seems too restrictive and could hinder future reviews, so the group chose to delete the last paragraph. ZS will incorporate the changes and resend the document to the group.
- MA will add an extra Subcommittee call on Jan 29 at 1:00 pm (added below)

**Future Call Schedule:**

January 15, 2013 1:00 EST

Discuss/vote on DBDMH (JFo)-vote delayed  
Continue discussion on auxiliary/"other" ingredients (ZS)

January 29, 2013 1:00 EST

Vote on DBDMH  
Continue discussion on auxiliary/"other" ingredients (ZS)

February 5, 2013 1:00 EST

Continue discussion of ammonium hydroxide checklist (JR)  
Final discussion and vote on auxiliary/"other" ingredients

February 19, 2013 1:00 EST

March 5, 2013 1:00 EST

March 19, 2013 1:00 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



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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, January 29, 2013, 1:00 pm EST**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Carmela Beck (CBe), Tracy Favre (TF), Nick Maravell (NM), Jean Richardson (JR), Mac Stone (MS) - sitting in

**Absent:** Joe Dickson (JD)

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a> CAS # 77-48-5	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013	01 29 13	Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07 25 12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605 (b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB recc</a> <a href="#">2006 Formal NOSB recc</a>
<a href="#">Sodium gluconate</a>	205.605	JD	Yes	No	On hold		Petition sent to HS on 3/22/2011; for use in soap; TR Requested 11/15/2011. On hold, for cosmetic use.
<a href="#">Bergamot Bitter Orange Powder</a>	205.606	TF	Yes	<a href="#">Yes</a>	On hold		Sent to HS on 3/22/2011; TR Requested 5/23/11; sent to contractor on 10/27/11. TR sent to HS on 2/16; Updated TR sent to HS 04 30 12. TR posted 06/25/12. On hold.
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	205.605	JR	No	NA	Fall 2013		<a href="#">2000 petition</a> , <a href="#">2001 Recommendation</a> , <a href="#">2001 TAP</a> , <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested
<a href="#">Glycerin</a>	removal from 205.605	TF	<a href="#">1995 TR</a>		?		Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive	205.605						Petition sent to MS/HS 01/28/13. Response from the HS chair is requested by March 29, 2013.
Sunset 2015 - Status of current review process							
Name	CAS #	Rvwr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name	Rvwr	Meeting	Vote	Notes*			
<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>	ZS	Spr 2013	01 29 13	Proposal spring 2013.			

\* Highlight indicates committee action needed.

### **Agenda**

- Approve notes from January 15, 2013
- Vote on DBDMH
- Continue discussion on auxiliary/"other" ingredients (ZS)

### **Discussion**

- Notes from January 15, 2013 were approved with no changes.
- The Chair asked for further discussion and declaration of interests on DBDMH before voting, for which there was none.

**Vote on DBDMH:**

Motion to classify DBDMH (CAS # 77-48-5) as petitioned as synthetic:

Motion by: JFo

Seconded by: JR

No further discussion

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

Motion to list DBDMH (CAS# 77-48-5) as petitioned on 205.605(b)

Motion by: JFo

Seconded by: HA

Additional discussion: EBR asked that JFo make sure the narrative is included, as the version sent on 1/14/13 does not have it.

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

- Auxiliary/"other" ingredients – The group discussed edits to the latest draft document, which included language from EBR about "Everything Added to Food in the United States" (EAFUS), and Generally Regarded as Safe (GRAS). The NOP asked about sunset dates and did some word-smithing to indicate that review of "Other Ingredients" currently in use would occur at the next sunset review. The NOP asked that the NOSB be clear about this in its recommendation and noted that this procedure can be included in the Policy and Procedures Manual. Potential language suggested: "Items are allowed until first sunset review and subsequent rule amendment". The group made additional edits to the baseline criteria and CBI sections and discussed how to approach the subject of affidavits.

**Vote on Auxiliary/"other" ingredients**

Motion to adopt the proposal on auxiliary/"other" ingredients

Motion by: ZS

Seconded by: JR

No further discussion

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

**Future Call Schedule:**

January 29, 2013 1:00 EST extra call

Discuss/complete vote on DBDMH? (JFo)

Continue discussion/vote on auxiliary/"other" ingredients (ZS)

February 5, 2013 1:00 EST

Assign PGME

Discuss upcoming assignments

Discuss workplans for fall 2013

Review final proposals for spring meeting

February 19, 2013 1:00 EST

Continue discussion of ammonium hydroxide checklist (JR)

March 5, 2013 1:00 EST

March 19, 2013 1:00 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

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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, February 5, 2013, 1:00 pm EST**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Nick Maravell (NM), Jean Richardson (JR), Carmela Beck (CBe), Joe Dickson (JD), Mac Stone (MS) - sitting in

**Absent:** none

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwvr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a> CAS # 77-48-5	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013	01 29 13	Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07/25/12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605(b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB recc</a> , <a href="#">2006 Formal NOSB recc</a>
<a href="#">Sodium gluconate</a>	205.605	JD	Yes	No	On hold		Petition sent to HS on 3/22/2011; for use in soap; TR Requested 11/15/2011. On hold, for cosmetic use.
<a href="#">Bergamot Bitter Orange Powder</a>	205.606	TF	Yes	<a href="#">Yes</a>	On hold		Sent to HS on 3/22/2011; TR Requested 5/23/11; sent to contractor on 10/27/11. TR sent to HS on 2/16; Updated TR sent to HS 04 30 12. TR posted 06/25/12. On hold.
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13

**Petitioned Substances - Status of current review process**

Name	National List Section	Rvwvr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	205.605	JR	No	NA	Fall 2013		<a href="#">2000 petition.</a> <a href="#">2001 Recommendation.</a> <a href="#">2001 TAP.</a> <a href="#">2001 Background Paper.</a> 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested
<a href="#">Glycerin</a>	removal from 205.605	TF	<a href="#">1995 TR</a>		Fall 2013		Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive	205.605	JR					Petition sent to MS/HS 01/28/13. Sufficiency response due March 29, 2013.

Sunset 2015 - Status of current review process							
Name	CAS #	Rvwr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD			Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name		Rvwr			Meeting	Vote	Notes*
Auxiliary/Other Ingredients		ZS			Proposal Spr 2013	01 29 13	<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>

\* Highlight indicates committee action needed.

### Agenda

- Approve notes from January 29, 2013
- Assign PGME
- Discuss upcoming assignments (Glycerin, Gibb, Ammonium hydroxide, 4 sunsets)
- Discuss workplans for fall
- Review final proposals for spring meeting

### Discussion

- Notes from January 29, 2013 were approved with no changes
- Polyalkylene glycol monobutyl ether (PGME): Jean Richardson volunteered to lead the review for this material
- Glycerin: A petition for removal has been received. A member said that since the classification guidance might be coming out before the fall the group may have to revisit the classification of this material, as well as such things as gums under sunset review. TF and ZS will co-lead the review for this material. MA will add review of classification guidance to the agenda at the bottom of the notes.
- Finalization of spring 2013 proposals. ZS is going to look at revised checklist for sugar beet fiber. JFo will revise the checklist for Barley betafiber, placing it on the old checklist, since the revised version is not ready yet. The chair asked the members to finalize each of the proposals by completing the cover sheets and filling in votes, then sending the final docs to him and MA by Feb 8.
- "Other ingredients"- ZS will provide a PowerPoint presentation for the spring meeting
- With regard to public comments, members feel that "Other ingredients" will solicit the most feedback, then barley betafiber and sugar beet fiber, then DBDMH
- The Chair asked that the lead reviewer be the one to present and let MA know what format the presentation will take.
- As was discussed on the last Executive Subcommittee call, the HS may have more public comment time allocated than needed. This will allow for adjustments to the schedule.

- The group discussed the pre-meeting preparation time and how best to use that time to inform other Board members about the Handling Subcommittee proposals, especially those that do not sit on Handling.

**Future Call Schedule:**

January 29, 2013 1:00 EST extra call

Discuss/complete vote on DBDMH? (JFo)

Continue discussion/vote on auxiliary/"other" ingredients (ZS)

February 5, 2013 1:00 EST

Assign PGME- done

Discuss upcoming assignments - done

Discuss workplans for spring - done

Review final proposals for spring meeting - done

February 19, 2013 1:00 EST

Continue discussion of ammonium hydroxide checklist (JR)

March 5, 2013 1:00 EST

Glycerin

March 19, 2013 1:00 EST

Classification guidance (if released) and its implication for gums, glycerin, etc. – most likely will be rescheduled to after the spring 2013 meeting

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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, February 19, 2013, 1:00 pm ET**

**Present:** Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Jean Richardson (JR), Carmela Beck (CBe), Joe Dickson (JD)

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

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwvr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a> CAS # 77-48-5	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013	01 29 13	Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07/25/12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605(b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB recd</a> , <a href="#">2006 Formal NOSB recd</a>
<a href="#">Sodium gluconate</a>	205.605	JD	Yes	No	On hold		Petition sent to HS on 3/22/2011; for use in soap; TR Requested 11/15/2011. On hold, for cosmetic use.
<a href="#">Bergamot Bitter Orange Powder</a>	205.606	TF	Yes	<a href="#">Yes</a>	On hold		Sent to HS on 3/22/2011; TR Requested 5/23/11; sent to contractor on 10/27/11. TR sent to HS on 2/16; Updated TR sent to HS 04 30 12. TR posted 06/25/12. On hold.
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a> CAS # 1336-21-6	205.605	JR	No	NA	Fall 2013	02 19 13	<a href="#">2000 petition</a> . <a href="#">2001 Recommendation</a> . <a href="#">2001 TAP</a> . <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested
<a href="#">Glycerin</a>	removal from 205.605	TF/ZS	<a href="#">1995 TR</a>		Fall 2013		Petition sent to HS on 01 09 13. Petition found sufficient 02 19 13. TR requested 02 19 13
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive (CAS# 9038-95-3)	205.605	JR					Petition sent to MS/HS 01 28 13. Sufficiency response due March 29, 2013. Petition found sufficient 02 19 13. TR requested 02 19 13

Sunset 2015 - Status of current review process							
Name	CAS #	Rvwr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name	Rvwr	Meeting	Vote	Notes*			
Auxiliary/Other Ingredients	ZS	Proposal Spr 2013	01 29 13	<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>			

\* Highlight indicates committee action needed.

## Agenda

- Approve notes from February 5, 2013
- Ammonium Hydroxide Checklist: review, discuss and possible vote.
- Tracy - update on the petition sufficiency response to Glycerin. Scheduled for in-depth discussion on the 3/11 call.
- Jean - Update on petition sufficiency on polyalkylene glycol monobutyl ether PGME. This is due on 3/29.
- Public Comment Period. Michelle can update us on start/close and process for all board members and respective sub-committees.
- Discuss when Michelle will need "Lead's" presentation for Portland meeting.
- Thoughts for the fall semester work plan?

## Discussion

- Notes from February 5, 2013 approved with no change.
- Ammonium Hydroxide Checklist: JR summarized the work to date on the Ammonium Hydroxide review. Ammonium hydroxide is used as a boiler additive and an anti-corrosive for pipes. It does not appear that this is essential as there are alternative practices and other substances that do the same thing. The substance does not satisfy many of the criteria for organic: human health, environmental impacts (climate change), essentiality, and organic practices. The members discussed the argument set forth by the petitioner that ammonium hydroxide is required, despite the fact that there are three other boiler additives already on the national list. The group felt that this was not a very strong argument and that the negatives outweighed any of the positive aspects that may exist. A member asked for a comparison between ammonium hydroxide and the other 3 substances on the list with regard to environmental safety, worker safety, and efficacy, to which another member replied that it's the ammonia that is the problem. The Subcommittee decided that they did not need a new TR and that the last ones were sufficient.

### **Vote on Ammonium Hydroxide**

Motion to classify ammonium hydroxide (CAS # 1336-21-6) as petitioned as synthetic

Motion by: JR

Seconded by: TF

Further discussion: none

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

Motion to add ammonium hydroxide (CAS # 1336-21-6) as petitioned to §205.605

Motion by: JR

Seconded: CBe

Further discussion: none

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

- Glycerin (petition to remove): A member asked about evaluating the past TR to determine if it is sufficient or if they should submit a request for a new one. A member, who was involved in writing the original TR, noted that at the time of the original review, synthetic glycerin was allowed, and commercial availability was not addressed because at that time (1995) it did not exist. A member also noted that the original TR seemed to include a lot of information supplied only by the manufacturer. The group found the petition to be sufficient and TF recommended requesting a new TR. HA will send TR to request to the National List Manager.

- PGME: The petition is very specific: the addition of one form of monobutyl ether, (CAS# 9038-95-3) at a minimum molecular weight of 1500. The members discussed the petition and noted that it was very well written, and did not contain any Confidential Business Information, and so deemed it to be sufficient. The group discussed the need for a TR, and determined that since this was a new substance and they had no scientific background or history, they would request one. HA will send TR to request to the National List Manager.
- MA updated the group on the public comment period, and discussed the timeline for receiving presentations for the Portland Meeting. She would like to receive them, or determine what should be projected, by the Monday prior to the start of the meeting, during the pre-meeting preparation time.
- Workplans. The members discussed several items on the workplan for the fall 2013 meeting, and MA has the action item to check with EBR and the National List Manager (NLM) as to the status of the following:
  - Bergamot Bitter Orange Powder - Is this on hold pending information from FDA?
  - Sodium gluconate. The members recalled receiving a memo from the NLM indicating that this substance was petitioned for use in personal care products and therefore should not be on list. Can it be removed from the workplan?
  - Gibberellic Acid - waiting for response from petitioner.

**Future Call Schedule:**

February 19, 2013 1:00 EST

Continue discussion of ammonium hydroxide checklist (JR)

March 5, 2013 1:00 ET

Glycerin

March 19, 2013 1:00 ET

Classification guidance (if released) and its implication for gums, glycerin, etc. – most likely will be rescheduled to after the spring 2013 meeting

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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, March 5, 2013, 1:00 pm ET**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Jean Richardson (JR), Carmela Beck (CBe)

**Absent:** Joe Dickson (JD), Nick Maravell (NM)

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a> CAS # 77-48-5	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013	01 29 13	Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07/25/12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605(b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB rec, 2006 Formal NOSB rec</a>
<a href="#">Sodium gluconate</a>	205.605	JD	Yes	No	On hold		Petition sent to HS on 3/22/2011; for use in soap; TR Requested 11/15/2011. NOP notified HS on 02 10 12 that it is unable to provide TRs for personal care product petitions. Will be removed from workplan table for now.
<a href="#">Bergamot Bitter Orange Powder</a>	205.606	TF	Yes	<a href="#">Yes</a>	Withdrawn		Sent to HS on 3/22/2011; TR Requested 5/23/11; sent to contractor on 10/27/11. TR sent to HS on 2/16; Updated TR sent to HS 04 30 12. TR posted 06/25/12. Removed from consideration. Does not have EPA registration for petitioned use.

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwvr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a> CAS # 1336-21-6	205.605	JR	No	NA	Fall 2013	02 19 13	<a href="#">2000 petition</a> , <a href="#">2001 Recommendation</a> , <a href="#">2001 TAP</a> , <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested.
<a href="#">Glycerin</a>	removal from 205.605(b)	TF/ZS	<a href="#">1995 TR</a>		Fall 2013		Petition sent to HS on 01 09 13. Petition found sufficient 02 19 13. TR requested 02 19 13
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive (CAS# 9038-95-3)	205.605	JR			Fall 2013		Petition sent to MS/HS 01 28 13. Sufficiency response due March 29, 2013. Petition found sufficient 02 19 13. TR requested 02 19 13
Sunset 2015 - Status of current review process							
Name	CAS #	Rvwvr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name	Rvwvr	Meeting	Vote	Notes*			
Auxiliary/Other Ingredients	ZS	Proposal Spr 2013	01 29 13	<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>			

\* Highlight indicates committee action needed.

### Agenda

- Approve notes from February 19, 2013

- Glycerin (TF)
- Update from EBR about the following: Bergamot Bitter Orange Powder, Sodium gluconate, and Gibberellic Acid
- Public comments for HS topics so far

### **Discussion**

- Notes from February 19, 2013 approved with no changes
- Glycerin – The Subcommittee approved the petition and requested a new TR on the last call. The petitioner is requesting removal from 205.605(b) and claims there is an organic version of glycerin that should be considered agricultural. The group discussed how to proceed with this material including a proposal to move it to a different section, perhaps 606, in an effort to solicit public feedback about supply and demand. A member noted that OMRI published an article about glycerin which she will locate and distribute to the other members.
- Bergamot Bitter Orange Powder - This material was removed from consideration because it does not have EPA registration for petitioned use as an antimicrobial. The Chair asked about setting a precedent, i.e. not reviewing a material that is not EPA registered, which is the standard operating procedure, but in this case the status was not properly identified.
- Sodium gluconate - The NOP informed the NOSB on February 10, 2012 that it lacks funds for TRs for substances used in personal care products. It has been removed it from the workplan table.
- The group discussed the public comments that have come in so far, and the fact that many of the comments were general and not specific to any of the current proposals or topics.
- JFo asked that HA substitute for him on the March 19<sup>th</sup> call, as he will be travelling for work. The group will review the public comments on the next call.

### **Future Call Schedule:**

February 19, 2013 1:00 EST

Continue discussion of ammonium hydroxide checklist (JR)

March 5, 2013 1:00 ET

Glycerin

March 19, 2013 1:00 ET

Review public comments

Classification guidance (if released) and its implication for gums, glycerin, etc. – this agenda item most likely will be rescheduled to after the spring 2013 meeting

April 2, 2013 1:00 ET

<b>Spring 2013 Milestones</b>	<b>Target date</b>
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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, March 19, 2013, 1:00 pm ET**

**Present:** Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Jean Richardson (JR), Carmela Beck (CBe), Joe Dickson (JD), Mac Stone - sitting in

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

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a> CAS # 77-48-5	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013	01 29 13	Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07/25/12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605(b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB recc</a> , <a href="#">2006 Formal NOSB recc</a>
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a> CAS # 1336-21-6	205.605	JR	No	NA	Fall 2013	02 19 13	<a href="#">2000 petition</a> , <a href="#">2001 Recommendation</a> , <a href="#">2001 TAP</a> , <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested.
<a href="#">Glycerin</a>	removal from 205.605(b)	TF/ZS	<a href="#">1995 TR</a>		Fall 2013		Petition sent to HS on 01 09 13. Petition found sufficient 02 19 13. TR requested 02 19 13

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwr	TR rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive (CAS# 9038-95-3)	205.605	JR			Fall 2013		Petition sent to MS/HS 01 28 13. Sufficiency response due March 29, 2013. Petition found sufficient 02 19 13. TR requested 02 19 13
Sunset 2015 - Status of current review process							
Name	CAS #	Rvwr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name	Rvwr	Meeting	Vote	Notes*			
Auxiliary/Other Ingredients	ZS	Proposal Spr 2013	01 29 13	<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>			

\* Highlight indicates committee action needed.

### Agenda

- Approve notes from March 5, 2013
- Public comments for HS topics so far

### Discussion

- Notes from March 5, 2013 approved with no changes
- Members discussed the public comments received so far and how to address the comments at the meeting in an efficient manner. There were many comments submitted in the form of a petition about Auxiliary/other ingredients that the group felt contained misleading information, and they discussed how to clarify the information at the spring meeting. For example, it seems there was a misunderstanding about the allowance of "other ingredients," which was characterized in the form letter as being permitted without review by the Board, when in fact the proposal addresses how the review should be conducted. Members and the NOP are concerned that some commenters characterized the NOSB review as "illegal" when in fact they

follow OFPA and the regulations carefully in review of materials. The group also discussed the two fiber petitions and the lack of comments received so far. The group was hoping to receive comments from handlers with regard to these materials.

- The members discussed several materials that would be on the workplan in the future for sunset review, including gums, and Konjac flour.
- Members discussed a future agenda topic: Classification guidance and its implication for gums, glycerin, etc. is scheduled for April 2 below – This agenda item will most likely will be rescheduled to after the spring 2013 meeting as NOP indicated it was still in clearance.

**Future Call Schedule:**

February 19, 2013 1:00 EST

Continue discussion of ammonium hydroxide checklist (JR)

March 5, 2013 1:00 ET

Glycerin

March 19, 2013 1:00 ET

Review public comments

April 2, 2013 1:00 ET

Classification guidance (if released) and its implication for gums, glycerin, etc. – this agenda item most likely will be rescheduled to after the spring 2013 meeting. NOP indicated it was still in clearance

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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, April 2, 2013, 1:00 pm ET**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Jean Richardson (JR), Carmela Beck (CBe), Joe Dickson (JD), Nick Maravell (NM), Mac Stone-sitting in, Jay Feldman-sitting in

**Absent:**

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwvr	Technical Review (TR) rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">1,3-dibromo-5,5-dimethylhydantoin (DBDMH)</a> CAS # 77-48-5	205.605(b)	JFo	Yes	<a href="#">Yes</a>	Spr 2013	01 29 13	Petition sent to HS on 2/16/2012. TR requested. Rcvd and sent to contractor for revision. TR sent to HS 07 19 12. Due no later than Sept 30. TR was accepted by NOP as sufficient as is and posted ~11 06 12
<a href="#">Barley Betafiber</a>	205.606	JFo	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to HS on 6/20/11; TR accepted as sufficient 4/30/12. TR Posted 07/25/12
<a href="#">Sugar Beet fiber</a>	205.606	JFo/ ZS	Yes	<a href="#">Yes</a>	Spr 2013	12 18 12	Revised petition sent to Committee 2/10/2011; Revised TR sent to HS 04/26/12. TR accepted as sufficient 4/30/12. TR posted 06/25/12
<a href="#">Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>)</a>	205.605 (b)	JD	Yes	<a href="#">Yes</a>	Spr 2013	01 09 13	Petition sent to Subcommittee 8/17/2010; TR Requested 11/15/2011. Draft TR sent to HS 05/01/12. Deemed sufficient 11 06 12. TR posted ~11 06 12 <a href="#">2012 Formal NOSB recc</a> , <a href="#">2006 Formal NOSB recc</a>
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	Yes	<a href="#">Yes</a>	Fall 2013		Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a> CAS # 1336-21-6	205.605	JR	No	NA	Fall 2013	02 19 13	<a href="#">2000 petition</a> , <a href="#">2001 Recommendation</a> , <a href="#">2001 TAP</a> , <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested.

Petitioned Substances - Status of current review process							
Name	National List Section	Rvwvr	Technical Review (TR) rqst?	TR rcv'd ?	Mtng	Vote?	Notes*
<a href="#">Glycerin</a>	removal from 205.605(b)	TF/Z S	<a href="#">1995 TR</a>		Fall 2013		Petition sent to HS on 01 09 13. Petition found sufficient 02 19 13. TR requested 02 19 13
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive (CAS# 9038-95-3)	205.605	JR			Fall 2013		Petition sent to MS/HS 01 28 13. Sufficiency response due March 29, 2013. Petition found sufficient 02 19 13. TR requested 02 19 13
Sunset 2015 - Status of current review process							
Name	CAS #	Rvwvr	TR rqst?	TR rcv'd ?	Meeting	Vote	Notes*
<a href="#">Gellan gum 205.605(a)</a>		JD			Fall 2013		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>
<a href="#">Marsala at 205.606</a>		CBe	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Sherry at 205.606</a>		TF	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
<a href="#">Tragacanth at 205.606</a>		JD	No		Fall 2013		No TR rqst, <a href="#">2008 Recommendation</a>
Other Topics							
Name	Rvwvr	Meeting	Vote	Notes*			
Auxiliary/Other Ingredients	ZS	Proposal Spr 2013	01 29 13	<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>			

\* Highlight indicates committee action needed.

### Agenda

- Approve notes from March 19, 2013
- Discuss public comments

### Discussion

- Notes from March 19, 2013 approved with no changes
- The members discussed comments about the sugar beet fiber proposal and noted that they didn't hear from any processors that this product is essential.

- The group discussed the comments about the auxiliary/other ingredients, including the receipt of two comments about international considerations, which EBR will discuss further with the deputy administrator, and the section in the proposal called “other considerations”. The group did not intend on voting on this section, so they will move it to an appendix to make that point clear. The intent was to vote only on the policy and procedures. Members also discussed making minor edits to the text that refers to the CBI discussion document. There was also a request to publish the checklist questions, although the group feels that since the questions have not changed, and the checklist is based on OFPA and the regulation, there is no need to solicit public comment. The group felt it was not a problem to project the checklist at the meeting to illustrate the revised questions. Two other issues discussed: Concept of labeling, and adding products that have “other ingredients” to the National List. The members discussed the likelihood of not getting a 2/3 vote, and how to proceed if that occurs. They also discussed proposing that organic labels include “other ingredients” and determined that using the term “ingredients” is the main problem, as these items aren’t really ingredients. The members will discuss a backup plan if the current proposal does not pass as is.

**ABS note added April 5, 2013:** Handling Subcommittee members communicated via email to vote on amending the auxiliary/Other ingredients proposal to include language proposed in the public comments.

Motion to amend Auxiliary/Other ingredients proposal: ZS  
 Seconded by: JR  
 6: Yes: 6 No:1 Absent:1 Abstain: 0 Recuse: 0

**Future Call Schedule:**

March 19, 2013 1:00 ET

Review public comments

April 2, 2013 1:00 ET

Classification guidance (if released) and its implication for gums, glycerin, etc. – this agenda item most likely will be rescheduled to after the spring 2013 meeting. NOP indicated it was still in clearance

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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, May 7, 2013, 1:00 pm ET**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Jean Richardson (JR), Carmela Beck (CBe), Mac Stone-sitting in

**Absent:** Nick Maravell (NM), Joe Dickson (JD)

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances						
Substance	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	<a href="#">Yes</a>	Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13		On hold
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	205.605	JR	No	<a href="#">2000 petition</a> . <a href="#">2001 Recommendation</a> . <a href="#">2001 TAP</a> . <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested	Voted 02 19 13	Fall 2013
<a href="#">Glycerin</a>	removal from 205.605	TF	<a href="#">1995 TR</a>	Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13. TR due June		Fall 2013
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive	205.605	JR	Yes	Petition sent to MS/HS 01/28/13. TR Requested 2/19/2013. TR due July.		Fall 2013

## 2015 Sunsets § 205.605(a) and 205.606

Name	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gellan gum</a>	205.605(a)	JD		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Marsala</a>	205.606	CBe	No	<a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Sherry at</a>	205.606	TF	No	<a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Tragacanth</a>	205.606	JD	No	<a href="#">2008 Recommendation</a>		Fall 2013

## Other projects

Name	Contact	Notes*	Meeting
Ancillary Substances	ZS	<a href="#">Auxiliary/"other" ingredients (2012 disc doc)</a>	Fall 2013

\* Highlight indicates committee action needed.

## Agenda

- Approve notes from April 2, 2013
- Gibberellic acid discussion - ZS
- Ancillary substances next steps - ZS
- Ammonium hydroxide - JR
- Arrange the anticipated agenda for the next few meetings

## Discussion

- A member asked to add one item to the agenda: a discussion of the Classification of Materials Guidance document, and specifically the agricultural/non agricultural decision tree
- Notes from April 2, 2013 were approved with no changes.
- Ammonium Hydroxide: The HS voted on Feb 19, 2013. MA will send JR the vote count so she can add that information to the proposal
- Gibberellic Acid: The group discussed the response from the petitioner, which they felt was not very extensive, and didn't answer all of the questions the Subcommittee had asked. The petitioner did include information about alternatives, i.e. plastic wrap, but explained this was a complementary technique, not a stand-alone alternative. The group discussed the use of Gibberellic acid in cherries, citrus, and potatoes as well, and decided that it should be reviewed again. Members suggested tabling discussion until NOP can provide more information on status of proposed guidance on post-harvest handling substances.
- Ancillary substances. ZS suggested that the next step would be to revise the checklist and to add questions about ancillary substances, which she will do before passing it along to the NOP to finalize. The checklist could be completed by the next Handling meeting. The NOP indicated that the sunset review process is being revised, and ZS volunteered to work on scheduling the review



of the sunset materials. ZS asked for a spreadsheet version of the substances on the National List by section including annotations, and sunset dates, which the NOP will generate and send. Those with likely ancillary substances will then be identified.

- The group discussed the flavors task force and noted that MS was a member when he was first appointed to the Board. Flavors is one of many topics needing further clarification, and the group discussed the need for more information from other task force members.
- Classification of Materials guidance and the ag/non ag decision tree. ZS is working with several groups that are going to submit comments about this guidance doc. There are some concerns about the implications of the classification for microorganisms and their products: the proposed guidance would result in reclassification of many substances as agricultural (and thus be required as organic for livestock).The group discussed submitting comments on behalf of the Subcommittee. ZS, who is also compiling comments for the Materials Subcommittee, asked for assistance with the HS document. The consensus was that commenting was important and useful.
- The Chair will ask JD about a timeline for the discussion of Gellan Gum and Tragacanth. Discussion dates for Marsala (CB) and sherry (TF) were scheduled below.

**Future Call Schedule:**

May 21, 2013 1:00 ET

Update on status of Gibb (EBR)

Review draft comments on the Classification of Materials Guidance (ZS)

June 4, 2013 1:00 ET

Gibberellic acid (ZS, TF)

Ancillary Substances (ZS)

Handling checklist review (all)

Sherry (TF)

June 18, 2013 1:00 ET

Marsala (CBe)

July 2, 2013 1:00 ET

July 16, 2013 1:00 ET

Glycerin (TF)

August 6, 2013 1:00 ET

PGME (JR)

August 20, 2013 1:00 ET

September 3, 2013 1:00 ET

September 17, 2013 1:00 ET

October 1, 2013 1:00 ET

October 15, 2013 1:00 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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, May 21, 2013, 1:00 pm ET**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Jean Richardson (JR), Joe Dickson (JD), Mac Stone - sitting in

**Absent:** Nick Maravell (NM), Carmela Beck (CBe)

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances						
Substance	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	<a href="#">Yes</a>	Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13		On hold
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	205.605	JR	No	<a href="#">2000 petition</a> . <a href="#">2001 Recommendation</a> . <a href="#">2001 TAP</a> . <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested	Voted 02 19 13	Fall 2013
<a href="#">Glycerin</a>	removal from 205.605	TF	<a href="#">1995 TR</a>	Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13. TR due June		Fall 2013
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive	205.605	JR	Yes	Petition sent to MS/HS 01/28/13. TR Requested 2/19/2013. TR due July.		Fall 2013

2015 Sunsets § 205.605(a) and 205.606						
Name	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gellan gum</a>	205.605(a)	JD		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Marsala</a>	205.606	CBe	No	<a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Sherry at</a>	205.606	TF	No	<a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Tragacanth</a>	205.606	JD	No	<a href="#">2008 Recommendation</a>		Fall 2013
Other projects						
Name	Contact	Notes*			Meeting	
Ancillary Substances	ZS	<a href="#">Final Recommendation: Ancillary Substances (Auxiliary/"other" ingredients) (PDF)</a>			Fall 2013	

\* Highlight indicates committee action needed.

### Agenda

- Approve notes from May 7, 2013
- Update on status of Gibb (EBR)
- Review draft comments on the Classification of Materials Guidance (ZS)

### Discussion

- Notes from May 7, 2013 were approved with no changes.
- Tragacanth and Gellan gum were added to the review schedule for July 16<sup>th</sup> (see below).
- Gibberellic acid (EBR) - Pending internal NOP review and USDA clearance, the anticipated publication date for the guidance on use of substances in post-harvest handling is July. The NOP feels that the guidance might not be out in time for the group to review this material for the fall meeting. The HS asked that the NOP inform the petitioner that they are delaying the review while waiting for pending guidance.
- Classification of Materials Guidance (ZS) - There are aspects in the decision trees (specifically the ag/non ag) that impact Handling and would lead to classification of microorganisms as agricultural. The Materials Subcommittee will be discussing this on their next call (May 28). The comment deadline is June 3, and members felt that they might not be done in time so MA will see about posting comments manually. JFO will take the lead on doing a side-by-side comparison of the current guidance with past NOSB recommendations (~2009, 2010, & 2011) on Materials classification. ZS will forward comments from various organizations (OTA, CCOF), and EBR will forward the previous documents. Members noted that this guidance will also will impact glycerin, and should keep that in mind for their review. TF will read the comments on glycerin when the comment period closes and before embarking on her review.

- NOP proposed sunset annotation change - MS is working with NOP to compile a flowchart to illustrate why annotation changes at sunset are problematic and will keep the Board members posted on efforts to develop alternative procedures.

**Future Call Schedule:**

May 21, 2013 1:00 ET

Update on status of Gibb (EBR)

Review draft comments on the Classification of Materials Guidance (ZS)

June 4, 2013 1:00 ET

Gibberellic acid (ZS, TF)

Ancillary Substances (ZS)

Handling checklist review (all)

Sherry (TF)

June 18, 2013 1:00 ET

Marsala (CBe)

July 2, 2013 1:00 ET

July 16, 2013 1:00 ET

Glycerin (TF)

Gellan Gum (JD)

Tragacanth (JD)

August 6, 2013 1:00 ET

PGME (JR)

August 20, 2013 1:00 ET

September 3, 2013 1:00 ET

September 17, 2013 1:00 ET

October 1, 2013 1:00 ET

October 15, 2013 1:00 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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, June 4, 2013, 1:00 pm ET**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Carmela Beck (CBe), Nick Maravell (NM), Joe Dickson (JD), Mac Stone-sitting in

**Absent:** Jean Richardson (JR)

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances						
Substance	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gibberellic acid</a>	205.605	ZS, TF	<a href="#">Yes</a>	Petition sent to HS 07/27/12. Petition Sufficiency Response Due Date: 09/27/12. Sent back to petitioner for additional questions 01 09 13		On hold
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	205.605	JR	No	<a href="#">2000 petition</a> . <a href="#">2001 Recommendation</a> . <a href="#">2001 TAP</a> . <a href="#">2001 Background Paper</a> . 2012 Petition sent to HS 11/06/12. Petition Sufficiency Response Due Date: 01/27/13. Petition found sufficient 12 18 12. No TR requested	Voted 02 19 13	Fall 2013
<a href="#">Glycerin</a>	removal from 205.605	TF	<a href="#">1995 TR</a>	Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13. TR due June		Fall 2013
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF)</a> As a boiler water additive	205.605	JR	Yes	Petition sent to MS/HS 01/28/13. TR Requested 2/19/2013. TR due July.		Fall 2013

2015 Sunsets § 205.605(a) and 205.606						
Name	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gellan gum</a>	205.605(a)	JD		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Marsala</a>	205.606	CBe	No	<a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Sherry at</a>	205.606	TF	No	<a href="#">2008 Recommendation</a>		Fall 2013
<a href="#">Tragacanth</a>	205.606	JD	No	<a href="#">2008 Recommendation</a>		Fall 2013
Other projects						
Name	Contact	Notes*			Meeting	
Ancillary Substances	ZS	<a href="#">Final Recommendation: Ancillary Substances (Auxiliary/"other" ingredients) (PDF)</a>			Fall 2013	

\* Highlight indicates committee action needed.

### Agenda

- Approve notes from May 21, 2013
- Handling checklist review (all)
- Ancillary Substances (ZS)
- Classification of Materials Guidance (ZS)
- Sherry (TF)

### Discussion

- Notes from May 21, 2013 approved as is
- Handling checklist review (all) - The group discussed the edits to the checklist and various questions, for example the difference between adverse effects and contamination. The two main goals for this project are to simplify the questions and eliminate redundancy. A member noted that Category 1 questions can be simplified while Category 2 questions are more complicated. For example, question # 2 could be split easily into 2a, 2b, and 2c. Ultimately the members decided that as long as the justifications in the comment section were clear and comprehensive, splitting compound questions into separate questions was not always necessary. The NOP will finish the edits and MA will add it to the appendix of the PPM.
- Ancillary Substances (ZS) - The group discussed the draft spreadsheet created to facilitate the scheduling and evaluation of the materials on the National List that may contain ancillary substances. The spreadsheet was initially populated with the Materials Working Group's list of ancillary substances in the TAPs and TRs and the NOP's list of sunset dates. To date, ZS has completed all of 605a and half of 605b. The group discussed the sunset review cycle and noted that the review of the ancillary substances will help spread out the workload. Members also discussed grouping similar items for review which was viewed positively, as long as it is clear what



was reviewed and how the review was conducted. A member reminded the group that §605 and §606 exist to allow for use of nonorganic substances in the 5% fraction of organic products because there has historically been recognition of this need. The group also discussed the inherent difficulties of reviewing these ancillary substances without using brand names, and instead, being able to review them as part of a generic substance, although they felt that having extra time to review will allow time the community to inform this process. ZS separated sanitizers and cleaners on the spreadsheet so they can be reviewed all at once across subcommittees. The NOP suggested it might be a good idea to coordinate with Crops and Livestock on review of sanitizers.

- Sherry (TF)/Marsala (CB) - The original petitions were considered robust, and the lead reviewers support relisting. A member asked that the rest of the group look at comments from organic wine producers about production, prior to finishing the review and writing the proposal.

**Future Call Schedule:**

June 4, 2013 1:00 ET

Ancillary Substances (ZS)  
 Handling checklist review (all)  
 Sherry (TF)

June 18, 2013 1:00 ET

Gibberellic acid (ZS, TF)  
 Marsala (CBe)

July 2, 2013 1:00 ET

July 16, 2013 1:00 ET

Glycerin (TF)  
 Gellan Gum (JD)  
 Tragacanth (JD)

August 6, 2013 1:00 ET

PGME (JR)

August 20, 2013 1:00 ET

September 3, 2013 1:00 ET

September 17, 2013 1:00 ET

October 1, 2013 1:00 ET

October 15, 2013 1:00 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)  
Handling Subcommittee (HS) Meeting Notes  
Tuesday, June 18, 2013, 1:00 pm ET**

**Present:** John Foster (Chair) (JFo), Harold Austin (Vice-Chair) (HA), Zea Sonnabend (ZS), Tracy Favre (TF), Carmela Beck (CBe), Nick Maravell (NM), Jean Richardson (JR), Joe Dickson (JD), Mac Stone-sitting in

**Absent:** none

**Staff:** Michelle Arsenault (MA) (Advisory Board Specialist (ABS)), Emily Brown Rosen (EBR)

**Work Plan**

Petitioned Substances						
Substance	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gibberellic acid</a>  <a href="#">Petition Addendum</a>	Add to 205.605	ZS, TF	<a href="#">Yes</a>	Petition sent to HS 07 27 12. Petition suffic response due 09 27 12. Sent back to petitioner for additional questions 01 09 13. Rcvd response 04 16 13. On hold until post- harvest handling draft guidance is published.		On hold
<a href="#">2012 Ammonium hydroxide (boiler water additive)</a>	Add to 205.605	JR	No	<a href="#">2000 petition.</a> <a href="#">2001 Recommendation.</a> <a href="#">2001 TAP.</a> <a href="#">2001 Background Paper.</a> 2012 Petition sent to HS 11 06 12. Petition Sufficiency Response Due Date: 01 27 13. Petition found sufficient 12 18 12. No TR requested	Voted 02 19 13	Fall 2013
<a href="#">Glycerin</a>	Remove from 205.605(b)	TF	<a href="#">1995 TR</a>	Petition sent to HS on 01 09 13. Sufficiency response due 03 11 13. TR sent to HS on 06 11 13. <b>Sufficiency due 08 12 13</b>		Fall 2013
<a href="#">Petition for polyalkylene glycol monobutyl ether PGME (PDF) (CAS # 9038-95-3)</a> As a boiler water additive	205.605	JR	Yes	Petition sent to MS/HS 01 28 13. TR Requested 2 19 2013. Draft TR sent to HS 06 11 13. <b>TR sufficiency response due 08 12 13</b>		Fall 2013

2015 Sunsets § 205.605(a) and 205.606						
Name	National List §	Contact	TR rqst?	Notes*	Vote	Meeting
<a href="#">Gellan gum</a> <a href="#">CAS # 71010-52-1</a>	205.605(a)	JD		<a href="#">2006 TR</a> , <a href="#">2008 Recommendation</a> <a href="#">2010 FR notice</a>		Fall 2013
<a href="#">Marsala</a>	205.606(g)	CBe	No	<a href="#">2008 Recommendation</a> <a href="#">2010 FR notice</a>		Fall 2013
<a href="#">Sherry</a>	205.606(g)	TF	No	<a href="#">2008 Recommendation</a> <a href="#">2010 FRnotice</a>		Fall 2013
<a href="#">Tragacanth</a> <a href="#">CAS # 9000-65-1</a>	205.606(x)	JD	No	<a href="#">2008 Recommendation</a> <a href="#">2010 FRnotice</a>		Fall 2013
Other projects						
Name	Contact	Notes*			Meeting	
Ancillary Substances	ZS	<a href="#">Final Recommendation: Ancillary Substances (Auxiliary/"other" ingredients) (PDF)</a>			Report Fall 2013	

\* Highlight indicates committee action needed.

### Agenda

- Approve notes from June 4, 2013
- Gibberellic acid (ZS, TF)
- Marsala (CBe)
- Ancillary substances--continuing discussion

### Discussion

- Notes from June 4, 2013 approved with no changes
- PGME – The NOP suggested that reviewers compare the TR discussion of mode of action with that presented in the petition, as it is important to determine if the substance has direct contact or not with organic products. The Subcommittee might need further information.
- Gibberellic acid (ZS, TF) - on hold until post-harvest handling memo is released. Noted in table above.
- Marsala (CBe). CBe did informal research into the need, use and availability of organic marsala, and found little to no information that it is in high demand. Several certifiers indicated that they saw very few if any processed products that contained non-organic sherry or marsala. CBe also attempted to contact the original petitioner (Fairfield Farm Kitchens) without success, and the rep from Gibson Wine Co., who was the manufacturer originally supplying the sherry and marsala to the petitioner. Additionally, after searching the 30 websites listed on the original sherry petition Organic Fortified Cooking Wine Source List, she found no organic sherry or organic marsala availability. An organic producer provided some additional information: organic sherry and

marsala can be made in the US, as all the components are present; Although the US doesn't have a large market for drinking sherry, it is used as a fortified cooking wine for use in processed organic goods. The group discussed removing marsala from the national list, which could potentially open a market void that needs to be filled. A member asked if there were viable alternatives to marsala and sherry, and if they contained sulfur dioxide. A member noted that sulfites are not typically added to these products so it is not an issue. The NOP noted the [FR notice](#) amending the National List to permit non-organic sherry and marsala included a discussion in response to comments about sulfites having not been restricted.(Dec 13, 2010, 75 FR page77524) . Members may want to keep this in mind as they do their review, and if the NOSB recommends keeping Marsala on §205.606 they could clarify the use of sulfites. The next steps include looking at commercial demand, doing a label search to find products that are using marsala and/or sherry, and determining if they should stay on the list with an annotation or be removed. The NOP will send the revised Handling checklist to the group so they can use it to complete their review. The members plan to discuss the checklists for both marsala and sherry on the July 2 call.

- Ancillary substances. The group discussed whether this workplan item should result in a proposal or a report, and decided that a report was more appropriate since it had already been approved as a full Board recommendation, and is now simply an implementation of that proposal. Additionally, the consensus was that a report would be the best way to present the changes to the community. ZS will work with the NOP on the spreadsheet and will discuss it further on the July 2 call.

**Future Call Schedule:**

June 18, 2013 1:00 ET

Gibberellic acid (ZS, TF)

Marsala (CBe)

July 2, 2013 1:00 ET

PGME-TR sufficiency

Glycerin-TR sufficiency

Marsala-Discuss checklist

Sherry-Discuss checklist

Ancillary substances-Continued discussion

July 16, 2013 1:00 ET

Glycerin (TF) – Discussion/checklist review

Gellan Gum (JD)

Tragacanth (JD)

August 6, 2013 1:00 ET

PGME discussion and decision (JR)

August 20, 2013 1:00 ET

September 3, 2013 1:00 ET

September 17, 2013 1:00 ET

October 1, 2013 1:00 ET

October 15, 2013 1:00 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