

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, December 10, 2024 1:00 pm ET

Present: Franklin Quarcoo (FQ), Chair; Brian Caldwell (BC), Vice Chair; Mindee Jeffery (MJ); Kyla Smith (KS); Wood Turner (WT); Nate Lewis (NL); Logan Petrey (LP); Dilip Nandwani (DN); Allison Johnson (AJ) - observer

Absent: None

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

Agenda

- Review November 12, 2024 notes
- Research priorities liaisons (All)
- Induced mutagenesis
- Inerts (updates, clarifications, and plan)
- Additional Items
- Adjourn

Discussion

- **November 12, 2024** notes were approved as written
- **Research priorities liaisons (All).** The group reassigned the Crops, Livestock, and Handling Subcommittee liaison roles and will receive the draft docs from the other Subcommittees by the January 14 call, so they have two calls to complete the discussion document for the Spring meeting.
- **Induced mutagenesis.** Members discussed the work to date, stakeholder views, and the path forward. A member noted that, currently, induced mutagenesis is considered a classical plant breeding method. Another member disagreed, and indicated that it is not allowed, even though it's not explicitly prohibited. A member recommended that the MS consider the IFOAM guidance as they move forward, as the IFOAM chart on seed breeding techniques could be useful. The group acknowledged the need to minimize disruption to the marketplace, and ways in which changes could be implemented with that in mind. The 2013 NOP policy memo was shared for reference <https://www.ams.usda.gov/sites/default/files/media/NOP-PM-13-1-CellFusion.pdf>. A member introduced the idea of a middle path of "certified organic seed vs. seed allowed for use in organic." Members asked how this would affect the impending EU regulations requiring 100% organic seed. The MS agreed to move ahead with a discussion document for the Spring 2025 meeting to allow stakeholders the opportunity to comment.
- **Inerts (updates, clarifications, and plan).** The Chair asked if anyone had any remaining thoughts about the inerts work. A member suggested the NOSB and NOP keep in mind the "roadmap for future sunset reviews" as NOP moves ahead with rulemaking.
- **Additional Items.** None.
- **The meeting was adjourned**

Previous MS Notes

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

November 12, 2024

December 10, 2024

January 14, 2025

Research Priorities (RPs) - discuss

Induced mutagenesis (MJ/DN/BC) - discuss

February 11, 2025

March 11, 2025

April 8, 2025
 May 2025
 June 2025
 July 2025
 August 2025
 September 2025
 October 2025
 November 2025
 December 2025

Work Agenda

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

Projects

Project	National List	Contact	Doc Type	Notes	Scheduled/status	Target meeting
Research Priorities (RPs)	N/A	FQ	Discussion Doc	May 2012 Framework Proposal Subcommittee reps to MS: Handling (HS): KS/DN Crops (CS): LP Livestock (LS): BC RPs due to MS from HS, CS, and LS by 01.9.25	1.14.25 2.11.25	Spr 2025
Excluded Methods - Induced mutagenesis - Fermentation (TBD)	N/A	MJ/D N/BC	Discussion document	MS requested TR on induced mutagenesis 1.10.23. TR due to NOP end-June. TR sent to MS 7.6.23. TR sufficiency due 9.4.23. TR found sufficient 8.8.23.	11.19.24 12.10.24 1.14.25 2.11.25	Spr 2025
Tall oil, distilled	205.601 205.603	WT	HOLD	2008 Petition (distilled tall oil). 2010 TR (tall oil). Petition sent to MS 9.4.20. Petition suff/TR request due 12.8.20. Petition found sufficient 12.8.20, and the MS requested a TR. TR due mid-Aug. TR sent to MS 8.13.21. TR suff due 10.12.21. TR found sufficient 10.12.21. Additional information from petitioner sent to MS 2.8.22 (see AMS-NOP-21-0087-0003). Returned to Subcomm at Spr 2022 meeting. On hold pending results from ANPR/guidance on inerts.	12.12.23	TBD

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

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

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Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, November 12, 2024 1:00 pm ET

Present: Franklin Quarcoo (FQ), Chair; Brian Caldwell (BC), Vice Chair; Mindee Jeffery (MJ); Logan Petrey (LP); Kyla Smith (KS); Amy Bruch (ADB); Allison Johnson (AJ); Nate Lewis (NL)

Absent: Michelle Arsenault (MA); Wood Turner (WT)

Staff: Heather Kumar (HK); Jo Mirenda (JM)

Agenda

- Review October 8, 2024 notes
- Potential Work Agenda Item: Classification of Materials that Undergo a Biological Process (e.g. Fermentation)
- Potential project for Food Technologist: Sanitizer data compilation
- Additional Items
- Adjourn

Discussion

- **October 8, 2024** notes were approved as written
- **Potential Work Agenda Item: Classification of Materials that Undergo a Biological Process (e.g. Fermentation).**
 - The Handling Subcommittee has been discussing a potential project on fermentation, and questions that continue to arise have to do with consistency of classification decisions.
 - The NOP mentioned the NOP handbook documents on classification, particularly 5033 part 4.7 and 5033-1 definition of "naturally occurring biological processes" & examples in table 1. The lead noted that this potential work agenda item could lead to updates to the handbook documents. and the MS would request a new work agenda item.
 - The group discussed the rationale for this project, what problems would be solved, and the possible benefits. A member added that while commenters have mentioned this as a potential issue, certifiers do a good job of compliance enforcement, and there may not actually be a problem to solve.
- **Potential project for Food Technologist: Sanitizer data compilation**
 - The group discussed a potential project for the Food Technologist regarding sanitizers. The idea would be to compile a spreadsheet of all the currently allowed sanitizers, so when the NOSB receives a new petition, they have a resource to consult. A member suggested adding other two other pieces of info to the list - additional ingredients and regulatory references.
 - A member offered to send notes from the sanitizer expert panel (from a previous NOSB Meeting) to everyone.
 - The NOSB Chair suggested the MS may want to send this work agenda to the Executive Committee for approval, and also checked to make sure the Food Technologist had time to add another project. A member suggested that compilation of a list could be "pre-work" and then the MS can figure out what how to proceed.
- **Additional Items**
 - **Inerts.** The group discussed the final cover letter for the Inerts recommendation (due November 22). The NOP suggested clarifying which specific parts of Appendix A are relevant for Option 1 since Appendix A has lots of tabs and substances. The lead emphasized the need to leave future Boards with a roadmap for sunset review for each option.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

October 8, 2024

Meeting prep

November 12, 2024

December 10, 2024

January 14, 2025

February 11, 2025

March 11, 2025

April 8, 2025

May 2025

June 2025

July 2025

August 2025

September 2025

October 2025

November 2025

December 2025

Work Agenda

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Projects

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Research Priorities (RPs)	N/A	WT/FQ	Discussion Doc	May 2012 Framework Proposal <u>Subcommittee reps to MS:</u> Handling (HS): KS/DN Crops (CS): LP? Livestock (LS): BC RPs due to MS from HS, CS, and LS by 01.9.25		Spr 2025
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Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, October 8, 2024 1:00 pm ET

Present: Franklin Quarcoo (FQ), Chair; Brian Caldwell (BC); Nate Lewis (NL); Wood Turner (WT), Vice Chair; Dilip Nandwani (DN); Mindee Jeffery (MJ); Logan Petrey (LP)

Absent: Kyla Smith (KS)

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

Agenda

- Review August 13, 2024 notes
- Meeting prep
- Additional Items
- Adjourn

Discussion

- **August 13, 2024** notes were accepted as written.
- **Fall meeting prep.** The group discussed preparation for the Fall NOSB meeting. The lead for inerts noted that the inerts topic is deep and broad and offered to sit one-on-one prior to the fall meeting with anyone who wants to talk more about the proposal. The MS discussed written comments that suggested a combination of the two options that the MS proposed, and whether that approach would constitute a new (third) proposal which would be considered a substantive change. If so, that would result in the proposal being sent back to Subcommittee for additional work.
- **Additional Items.**
 - **Meeting presentations.** The group discussed who would present what at the meeting, as well as how to proceed on the topic of fermentation. Since the MS is still trying to frame the project (i.e. classification), they will talk more about it on a future call.
 - The Research Priorities lead highlighted the transitioning of the Research Priorities to a member who is not rotating off in January. FQ will take over. A member noted that there is a 3-month period after the NOSB meeting to talk about transition.
- **The meeting was adjourned**

Previous MS Notes

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

September 10, 2024 - cancelled

October 8, 2024

Meeting prep

November 12, 2024

December 10, 2024

Work Agenda

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Projects

Project	National List	Contact	Doc Type	Notes	Scheduled/status	Target meeting
Research Priorities (RPs)	N/A	WT/ FQ	Proposal	May 2012 Framework Proposal Subcommittee reps to MS: Handling (HS): LP/DN Crops (CS): BC Livestock (LS): BC RPs due to MS from HS, CS, and LS by 01.16.24	8.13.24	Fall 2024
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Inert Ingredients in Pesticide Products	Misc	FQ, NL, LP, BC	Proposal	June 23, 2023 NOP Memo	5.14.24 6.25.24 7.9.24 7.30.24 8.13.24	Fall 2024

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Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, August 13, 2024 1:00 pm ET

Present: Franklin Quarcoo (FQ), Chair; Brian Caldwell (BC); Nate Lewis (NL); Kyla Smith (KS); Logan Petrey (LP); Wood Turner (WT), Vice Chair; Dilip Nandwani (DN)

Absent: Mindee Jeffery (MJ)

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

Agenda

- Review July 30, 2024 notes
- Excluded Methods discussion doc (MJ/DN/BC) - discuss/vote
- Research Priorities (RPs) proposal (All) - discuss/vote
- Inert Ingredients in Pesticide Products proposal (FQ, NL, LP, BC) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **July 30, 2024** notes were accepted as written.
- **Inert Ingredients in Pesticide Products proposal (FQ, NL, LP, BC).** The Food technologist circulated the inerts research to the Subcommittee members prior to the call. The MS reviewed the options listed in the proposal and the group discussed. Options include, aligning the inerts with the EPA Lists and adding restrictions and prohibitions, or adding individual inerts to the National List grouped by use categories. Members discussed the pros and cons of the various paths, and what each of those solutions would look like when it comes to future sunset reviews.

Motion to accept the Inert Ingredients in Pesticide Products proposal

Motion by: NL

Seconded by: BC

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

- **Excluded methods/Induced mutagenesis discussion doc (MJ/DN/BC).** The group briefly discussed the document on Excluded methods/induced mutagenesis and moved to a vote. Members are eager to read public comments on this topic.

Motion to accept the discussion document on excluded methods/Induced mutagenesis

Motion by: FQ

Seconded by: LP

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

- **Research Priorities (RPs) proposal (All).** The group reviewed each of the Subcommittee's lists. The Crops list changed minimally from the Spring version, the Livestock list did not change at all, and Handling grouped their research priorities by topic, but other than formatting, did not make major changes. The lead will make the final modifications and submit the document to the MS and NOP for the fall meeting.

Motion to accept the research priorities proposal

Motion by: WT

Seconded by: KS

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

- **Additional Items.** None.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

July 30, 2024

Inert Ingredients in Pesticide Products proposal (FQ, NL, LP, BC)

August 13, 2024 (Fall proposals due Aug 14, 2024)

Excluded Methods discussion doc (MJ/DN/BC) - discuss/vote

Research Priorities (RPs) proposal (All) - discuss/vote

Inert Ingredients in Pesticide Products proposal (FQ, NL, LP, BC) - discuss/vote

September 10, 2024

October 8, 2024

November 12, 2024

December 10, 2024

Work Agenda

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Materials (MS) (GMO ad hoc) Subcommittee Notes
Tuesday, July 30, 2024 1:00 pm ET

Present: Franklin Quarcoo (FQ), Chair; Brian Caldwell (BC); Nate Lewis (NL); Kyla Smith (KS); Mindee Jeffery (MJ); Logan Petrey (LP)

Absent: Wood Turner (WT), Vice Chair; Dilip Nandwani (DN)

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

Agenda

- Review July 9, 2024 notes
- Inert Ingredients in Pesticide Products proposal (FQ, NL, LP, BC)
- Additional Items
- Adjourn

Discussion

- **July 9, 2024** notes were approved as written.
- **Inert Ingredients in Pesticide Products proposal (NL, FQ, LP, BC).** The lead summarized the current iteration of the proposal, and the group discussed the various options for reviewing inerts. For example, grouped into functional groups, grouped by use, or individually. The Food Technologist provided the MS with a robust and complex list of inerts, grouped in various ways, as a foundation to help determine how best to move forward. There are about 300 inerts in use in organic. Members offered feedback and ideas and highlighted that the public will have multiple opportunities to weigh in on the options. A member mentioned inert ingredients allowed by the EPA and the list of ones that are “exempt from tolerance”. The MS is intent on giving NOP the widest flexibility for rulemaking, allowing for more durability. The lead will provide a draft to MS members by Monday August 5 to vote on during the August 13 meeting, and will write a summary paragraph for the proposal, so the motion is clear to both the MS and the NOSB. The MS will discuss the proposal again several times before the Fall meeting to make sure the rest of the Board members have time to read and digest it.
- **Update from Food Technologist.** The Food Technologist thanked the group for their collaboration and support on the inerts project. The MS will link the background research (which is in Excel) in the proposal and post the Excel spreadsheet in the docket, so commenters have access.
- **Additional Items.**
 - The lead author for the Excluded Methods project encouraged the group to add to the TBD list, so they do not lose momentum, and the project will continue to move forward.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

June 25, 2024 - note date change

Guest speaker (EPA)

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC)

July 9, 2024

Excluded Methods (MJ/DN/BC) - discuss

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC)

July 30, 2024

Inert Ingredients in Pesticide Products proposal (FQ, NL, LP, BC)

August 13, 2024 (Fall proposals due Aug 14, 2024)

Excluded Methods discussion doc (MJ/DN/BC) - discuss/vote

Research Priorities (RPs) proposal (All) - discuss/vote

Inert Ingredients in Pesticide Products proposal (FQ, NL, LP, BC) - discuss/vote

September 10, 2024

October 8, 2024

November 12, 2024

December 10, 2024

Work Agenda

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Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, June 25, 2024 1:00 pm ET

Present: Franklin Quarcio (FQ), Chair; Wood Turner (WT), Vice Chair; Brian Caldwell (BC); Nate Lewis (NL); Kyla Smith (KS); Mindee Jeffery (MJ); Dilip Nandwani (DN)

Absent: Logan Petrey (LP)

Guests: Evisabel Craig (Team lead for inert ingredients) and Kerry Leifer (Branch Chief); Chemistry, Inerts, and Toxicology Assessment Branch of the Pesticide Programs, Registration Division, EPA.

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

Agenda

- Review May 14, 2024 notes
- Guest speakers - EPA
- Additional Items
- Adjourn

Discussion

- **May 14, 2024** notes were approved via email as written.
Guest speakers - Inerts. Evisabel Craig and Kerry Leifer of the EPA joined the call to discuss inerts. Dr. Leifer was part of the original inerts working group (IWG) composed of members of the NOSB, NOP, and EPA that started in 2010, so he has a strong background in this topic both from an EPA perspective and organic perspective. Both guest speakers provided history of the development of the EPA inerts lists (1 - 4), and the obsolescence of the lists. The MS shared the questions from the inerts proposal, and the group discussed the various options the NOSB is considering as it considers how to review inerts. The MS asked several questions regarding the definition of inerts, and how the organic and EPA definitions align.

The Materials Subcommittee is evaluating two different approaches: 1) Including a broad allowance for inerts and a list of specific substances that should be prohibited, or 2) Listing all organically-allowed inerts individually.

The group discussed various aspects of the EPA's process for reviewing inerts including whether the EPA groups inerts into categories or individually. For the most part, inerts are reviewed individually, but at the last EPA re-assessment, some were grouped by functional class i.e. emulsifiers. The group also talked about the EPA Safer Choice Program and FIFRA

([Federal Insecticide, Fungicide, and Rodenticide Act](#)), safety standards that prohibit registration of pesticides that generally pose unreasonable risks to people, including agricultural workers, or the environment. Dr. Craig noted that there are over 2500 inerts. However, based on research provided to the NOSB, there are reportedly only ~300 inerts in use in organic agriculture. The MS also asked how EPA evaluates substances that can function as both active ingredients and inert ingredients in pesticide formulations. Dr. Leifer indicated that they conduct separate evaluations based on how it interacts with the target pest.

The MS invited the EPA to comment on the proposal for the Fall meeting, and will share that link when it is available.

- **Additional Items.** The Food Technologist highlighted how helpful it's been that she was able to work directly with the Materials Subcommittee members as she has been researching this subject.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

May 14, 2024

Guest speakers

June 25, 2024 - note date change

Guest speaker (EPA)

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC)

July 9, 2024

Excluded Methods (MJ/DN/BC) - discuss

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC)

August 13, 2024 (Fall proposals due Aug 14, 2024)

Research Priorities (RPs) (All) - discuss/vote

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss/vote

September 10, 2024

October 8, 2024

November 12, 2024

December 10, 2024

Work Agenda

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

Projects

Project	National List	Contact	Doc Type	Notes	Scheduled/status	Target meeting
Research Priorities (RPs)	N/A	WT	Proposal	May 2012 Framework Proposal <u>Subcommittee reps to MS:</u> Handling (HS): LP/DN Crops (CS): BC Livestock (LS): BC RPs due to MS from HS, CS, and LS by 01.16.24	7.9.24 8.13.24	Fall 2024
Excluded Methods - Induced mutagenesis - Fermentation	N/A	MJ/DN/BC	Discussion Doc	MS requested TR on induced mutagenesis 1.10.23. TR due to NOP end-June. TR sent to MS 7.6.23. TR sufficiency due 9.4.23. TR found sufficient 8.8.23.	7.9.24	Fall 2024

Tall oil, distilled	205.601 205.603	WT	HOLD	2008 Petition (distilled tall oil). 2010 TR (tall oil). Petition sent to MS 9.4.20. Petition suff/TR request due 12.8.20. Petition found sufficient 12.8.20, and the MS requested a TR. TR due mid-Aug. TR sent to MS 8.13.21. TR suff due 10.12.21. TR found sufficient 10.12.21. Additional information from petitioner sent to MS 2.8.22 (see AMS-NOP-21-0087-0003). Returned to Subcomm at Spr 2022 meeting. On hold pending results from ANPR/guidance on inerts.	12.12.23	TBD
Inert Ingredients in Pesticide Products	Misc	FQ, NL, LP, BC	Proposal	June 23, 2023 NOP Memo	5.14.24 6.25.24 7.9.24 8.13.24	Fall 2024

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
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NOP - Send compiled public comments to NOSB	~Oct 3, 2024	~2
Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, May 14, 2024 1:00 pm ET

Present: Franklin Quarcoo (FQ), Chair; Wood Turner (WT), Vice Chair; Brian Caldwell (BC); Nate Lewis (NL); Logan Petrey (LP); Kyla Smith (KS); Mindee Jeffery (MJ); Dilip Nandwani (DN)' Allison Johnson (AJ) - observer

Absent: None

Staff: Michelle Arsenault (MA); Heather Kumar (HK); Jared Clark (JC)

Agenda

- Review April 9, 2024 notes
- Guest speakers - Inerts
- Additional Items
- Adjourn

Discussion

- **April 9, 2024** notes were approved via email, as written.
- **Guest speakers - Inerts.** Karen Warkenstien, Director, Regulatory Affairs AgroSpheres Inc. and Scott Tann-Lamberti (Lamberti - inert producer, surfactant Co.). Both guests co-chair the task force for inerts, and are working with the Biological Products Industry Alliance (BPIA).

The MS has a proposal on inerts in development and is trying to gauge which of the 4 options proposed in the Spring 2024 discussion document are most feasible and effective for reviewing inerts, given that lists 3 and 4 are now obsolete (since about 2004) and EPA no longer updates them. The MS noted that the two most pressing areas of interest are formulations, and impacts that a static list (e.g. Lists 3 and 4) may have on innovation.

After introductions, the guest speakers summarized the history of inerts at EPA and FDA and the group discussed several issues such as tolerances, use in food vs. non-food agricultural ingredients, regulatory changes over the years, and the petition process and approval for use in organic.

- **Additional Items.** None.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

April 9, 2024

Discuss public comment process

Prep for Spring NOSB meeting

May 14, 2024

Guest speakers

June 25, 2024 - **note date change**

July 9, 2024

August 13, 2024 (Fall proposals due Aug 14, 2024)

Research Priorities (RPs) - Discuss/vote

September 10, 2024

October 8, 2024

November 12, 2024

December 10, 2024

Work Agenda

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Projects

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Excluded Methods (Induced mutagenesis)	N/A	MJ/DN /LP	Discussion Doc	MS requested TR on induced mutagenesis 1.10.23. TR due to NOP end-June. TR sent to MS 7.6.23. TR sufficiency due 9.4.23. TR found sufficient 8.8.23.	TBD	Fall 2024
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Inert Ingredients in Pesticide Products	Misc	FQ, NL, LP, BC	Proposal	June 23, 2023 NOP Memo	5.14.24	Fall 2024

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Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, April 9, 2024 1:00 pm ET

Present: Franklin Quarcio (FQ), Chair; Wood Turner (WT), Vice Chair; Brian Caldwell (BC); Nate Lewis (NL); Kyla Smith (KS); Mindee Jeffery (MJ); Dilip Nandwani (DN)

Absent: Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review March 12, 2024 notes
- Discuss public comment process
- Prep for Spring NOSB meeting
- Additional Items
- Adjourn

Discussion

- **March 12, 2024** notes were approved with no changes.
- **Public comment process.** The group discussed preparations for the Spring NOSB meeting.
- **Additional Items.**
 - **Inerts.** The MS discussed inviting a speaker(s) from the Biological Products Industry Alliance (BPIA) to the May 14 call to discuss inerts. The NOSB Chair recently participated on a panel at the BPIA meeting and interacted with staff, and feels they would be a great resource. Additionally, a public commenter recommended engaging with the EPA; specifically, the office that works on approval of inerts. The NOP suggested someone from EPA and KS and NL will follow up with the National List Manager to get connected. The MS will send NOP the names of the guest speaker(s) from BPIA. NL volunteered to lead the conversation on inerts at the April NOSB meeting. The group acknowledged the NOSB's work on this topic as conscientious, deliberate, and respectful, as they make forward progress.
 - **Communication.** The group discussed the current process for relaying information to the NOP since the National List Manager is not on the Subcommittee calls anymore. Members asked about an update about who is responsible for relaying information up the chain.
 - **TR templates.** The NOSB received lots of helpful comments, and discussed how to proceed at the meeting should they choose to make changes to the current proposal. Members discussed what would be considered substantive, given that these documents are internal templates to aid the NOSB in its work, and are not proposals for rulemaking. Members acknowledged the difficulties given that the topic of excluded methods isn't black and white. MJ will lead the conversation at the NOSB meeting.
 - **Seed comments.** MJ asked folks to pay attention to the comments regarding excluded methods as it seemed that commenters may be conflating two different projects.
 - **Excluded Methods.** The group discussed the plan for the Fall meeting and beyond, given that two of the leads will be rotating off the Board in January 2025. Ideally, the MS will establish top priorities and work on this immediately after the Spring meeting. Members expressed support for two sub-projects: a discussion document on induced mutagenesis, which could have implications for other processes on the TBD list; and a document on fermentation. They will talk more about the TBD list and what/if to add. A member emphasized the need for transition planning, given the turnover on the Board in the next few years, as members complete their terms.

- **Induced Mutagenesis (DN, BC).** The co-leads have a draft document and will share that with others as they determine how to move ahead. The plan is to have a discussion document ready for the Fall 2024 meeting. MJ noted the change in tenor of the comments from the seed community.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

March 12, 2024

April 9, 2024

Discuss public comment process

Prep for Spring NOSB meeting

May 14, 2024

Guest speaker

June 11, 2024

July 9, 2024

August 13, 2024 (Fall proposals due Aug 14, 2024)

September 10, 2024

October 8, 2024

November 12, 2024

December 10, 2024

Work Agenda

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Projects

Project	National List	Con-tact	Doc Type	Notes	Scheduled/status	Target meeting
Research Priorities (RPs)	N/A	WT	Discussion Doc	May 2012 Framework Proposal <u>Subcommittee reps to MS:</u> Handling (HS): LP/DN Crops (CS): BC Livestock (LS): BC RPs due to MS from HS, CS, and LS by 01.16.24	2.13.24	Spr 2024
Excluded Methods (Induced mutagenesis? fermentation?)	N/A	MJ/DN /LP	Discussion Doc	MS requested TR on induced mutagenesis 1.10.23. TR due to NOP end-June. TR sent to MS 7.6.23. TR sufficiency due 9.4.23. TR found sufficient 8.8.23.	12.12.23 3.12.24	Fall 2024

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Inert Ingredients in Pesticide Products	Misc.	FQ, NL, LP, BC	Discussion Doc	June 23, 2023 NOP Memo	9.12.23 10.10.23 11.14.23 12.12.23 1.9.24 2.13.24 3.12.24	Spr 2024
Technical Report (TR) Update	N/A	MJ	Proposal		1.9.24 1.30.24 2.13.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 -20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
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Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
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Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, March 12, 2024 1:00 pm ET

Present: Franklin Quarcio (FQ), Chair; Wood Turner (WT), Vice Chair; Brian Caldwell (BC); Nate Lewis (NL); Kyla Smith (KS); Dilip Nandwani (DN)

Absent: Mindee Jeffery (MJ); Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review February 13, 2024 notes
- Inert Ingredients in Pesticide Products (NL)
- Updates on excluded methods
- Additional Items
- Adjourn

Discussion

- **February 13, 2024** notes were accepted as written.
- **Inert Ingredients in Pesticide Products (NL).** The lead mentioned a previous conversation in which they discussed inviting guest speakers to future MS calls. Given the short timeline to complete the recommendation on inerts, there may not be enough time to convene a panel, and so inviting expert speakers seems more feasible. The group discussed the expertise they would seek, such as someone(s) who uses inerts, an inert/pesticide manufacturer, a researcher, and perhaps someone who could speak to the intersection of EPA and USDA, OFPA, and the legal implications. The group discussed outstanding questions that they could pose to speakers. The lead asked if NOP could explore names of folks at EPA and USDA that they could connect with the Subcommittee. The Food Technologists will relay this conversation to NOP staff, and the lead will also reach out to NOP to seek input from.
- **Updates on excluded methods (FQ).**
 - **Induced mutagenesis.** The MS Chair opened the floor to comments and questions from the Subcommittee members. A couple members have been discussing induced mutagenesis, and the TBD list, hoping to minimize it. This may look like a discussion document for Fall 2024, and a proposal in Spring 2025. The group discussed this method, noting that it's been in use since the 1930's, but questioned whether if it were newly introduced if it would be compatible with organic agriculture. The co-lead suggested looking through previous comments on induced mutagenesis, and plan to have a rough draft to share at a future call.
 - **Fermentation.** Both the HS and MS have had discussions about fermentation. The NOSB chair asked how to move this project forward, and if it would be a stand-alone document or part of the excluded methods project. Several members offered feedback, and the overall consensus is that it become part of the excluded methods project. The ultimate (and perpetual) question is how far back in the process does the board look, when reviewing a substance?" There is a general prohibition of GMOs, but it's not entirely clear how that prohibition is applied by certifiers, when they are the entities responsible for assessing the details.
- **Additional Items.** None.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

February 13, 2024

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss/vote
 Research Priorities (WT/All) - discuss/vote
 Excluded Methods (MJ/DN/LP) - discuss/vote

March 12, 2024

April 9, 2024

Discuss public comment process

Prep for Spring NOSB meeting

May 14, 2024

June 11, 2024

July 9, 2024

August 13, 2024 (Fall proposals due Aug 14, 2024)

September 10, 2024

October 8, 2024

November 12, 2024

December 10, 2024

Work Agenda

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Research Priorities (RPs)	N/A	WT	Discussion Doc	May 2012 Framework Proposal <u>Subcommittee reps to MS:</u> Handling (HS): LP/DN Crops (CS): BC Livestock (LS): BC RPs due to MS from HS, CS, and LS by 01.16.24	2.13.24	Spr 2024
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Inert Ingredients in Pesticide Products	Misc.	FQ, NL, LP, BC	Discussion Doc	June 23, 2023 NOP Memo	9.12.23 10.10.23 11.14.23 12.12.23 1.9.24 2.13.24 3.12.24	Spr 2024
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Milestones

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Materials (MS) (GMO ad hoc) Subcommittee Notes
Tuesday, February 13, 2024 1:00 pm ET

Present: Franklin Quarcio (FQ), Chair; Wood Turner (WT), Vice Chair; Mindee Jeffery; Brian Caldwell (BC); Nate Lewis (NL); Logan Petrey (LP); Kyla Smith (KS); Dilip Nandwani (DN)

Absent: None

Staff: Michelle Arsenault (MA); Jared Clark (JC); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review January 9, 2024 notes
- Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss/vote
- Research Priorities (WT/All) - discuss/vote
- Excluded Methods (MJ/DN/LP) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **January 30, 2024** notes were accepted as written.
- **Inert Ingredients in Pesticide Products Discussion Document (NL, FQ, LP, BC).** During the last NOSB meeting, the Materials Subcommittee posted a brief document with questions in the open docket, but this is the first meeting they will present a fully flushed out discussion document. The document includes 4 options for reviewing inerts, as well as a spreadsheet compiled by the NOP Food Technologists listing the inert substances on 4A and 4B. The lead summarized the comments they received previously, and noted there was no consensus. The MS intends on making the process as transparent as possible given the complexity and interest. Members provided feedback on the work-to-date, noting that it is an information-gathering-tool at the moment. The MS voted on the document and will submit it for the Spring meeting.

Motion to accept the discussion document on inert ingredients in pesticide products

Motion by: NL

Seconded by: BC

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

- **Research Priorities (WT/All).** The group reviewed the lists of priorities from the other Subcommittees. The lead will finalize the document and recirculate it so members can view the final version before voting via email. (Note: the final vote was tallied and recorded below)

Motion to accept the discussion document on research priorities

Motion by: WT

Seconded by: BC

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

- **Technical Report (TR) Update Proposal (MJ).** The group discussed the request by NOP to repost this as a proposal, so stakeholders have one more opportunity to submit feedback. The MS voted on the proposal and will submit it to NOP for the Spring meeting.

Motion to accept the proposal on TR template updates

Motion by: MJ
Seconded by: NL
Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1

- **Additional Items.** None.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

January 30, 2024 Additional call

February 13, 2024

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss/vote

Research Priorities (WT/All) - discuss/vote

Excluded Methods (MJ/DN/LP) - discuss/vote

March 12, 2024

April 9, 2024

May 14, 2024

June 11, 2024

July 9, 2024

August 13, 2024

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Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Materials (MS) (GMO ad hoc) Subcommittee Notes

Tuesday, January 30 2024 1:00 pm ET

Present: Franklin Quarcoo (FQ), Chair; Wood Turner (WT), Vice Chair; Mindee Jeffery; Brian Caldwell (BC)

Absent: Nate Lewis (NL); Logan Petrey (LP); Kyla Smith (KS); Dilip Nandwani (DN)

Staff: Michelle Arsenault (MA); Jared Clark (JC); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review January 9, 2024 notes
- Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss/vote
- Research Priorities (WT/All) - discuss/vote
- Excluded Methods (MJ/DN/LP) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **Review of the January 9, 2024** notes was deferred due to lack of quorum
- **Technical Report (TR) update (MJ).** The lead circulated a draft document, and the group provided feedback. There were no substantive changes, and the Subcommittee members were supportive of the document as presented. The group discussed the use of the different phrases based on the National List scope: ancillary substances in handling, and excipients and inerts in Crops and Livestock. The MS is seeking additional feedback from stakeholders, and deferred the vote to the February 13 call due to lack of quorum.
- **Additional Items.** None.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

January 9, 2024

Excluded Methods Discussion Doc (MJ/DN/LP) - discuss

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss

January 30, 2024 Additional call

February 13, 2024

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss/vote

Research Priorities (WT/All) - discuss/vote

Technical Report (TR) update (MJ) - discuss/vote

March 12, 2024

April 9, 2024

May 14, 2024

June 11, 2024

July 9, 2024

August 13, 2024

September 10, 2024

October 8, 2024

November 12, 2024

December 10, 2024

Work Agenda

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

Projects

Project	National List	Contact	Doc Type	Notes	Scheduled / status	Target meeting
Research Priorities (RPs)	N/A	WT	Discussion Doc	May 2012 Framework Proposal Subcommittee reps to MS: Handling (HS): LP/DN Crops (CS): BC Livestock (LS): BC RPs due to MS from HS, CS, and LS by 01.16.24	2.13.24	Spr 2024
Excluded Methods	N/A	MJ/DN /LP	Discussion Doc	MS requested TR on induced mutagenesis 1.10.23. TR due to NOP end-June. TR sent to MS 7.6.23. TR sufficiency due 9.4.23. TR found sufficient 8.8.23.	12.12.23	Fall 2024
Tall oil, distilled	205.601 205.603	WT	HOLD	2008 Petition (distilled tall oil). 2010 TR (tall oil). Petition sent to MS 9.4.20. Petition suff/TR request due 12.8.20. Petition found sufficient 12.8.20, and the MS requested a TR. TR due mid-Aug. TR sent to MS 8.13.21. TR suff due 10.12.21. TR found sufficient 10.12.21. Additional information from petitioner sent to MS 2.8.22 (see AMS-NOP-21-0087-0003). Returned to Subcomm at Spr 2022 meeting. On hold pending results from ANPR/guidance.	12.12.23	TBD
Inert Ingredients in Pesticide Products	Misc.	FQ, NL, LP, BC	Discussion Doc	June 23, 2023 NOP Memo	9.12.23 10.10.23 11.14.23 12.12.23 1.9.24 2.13.24	Spr 2024

Technical Report (TR) Update	N/A	MJ	Proposal		1.9.24 1.30.24 2.13.24	
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Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 -20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
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Materials (MS) (GMO ad hoc) Subcommittee Notes
Tuesday, January 9, 2024 1:00 pm ET

Present: Franklin Quarcio (FQ), Chair; Wood Turner (WT), Vice Chair; Mindee Jeffery; Nate Lewis (NL); Logan Petrey (LP); Kyla Smith (KS); Dilip Nandwani (DN); Brian Caldwell (BC)

Absent: None

Staff: Michelle Arsenault (MA); Jared Clark (JC); Heather Kumar (HK)

Agenda

- Review December 12, 2023 notes
- Inert Ingredients in Pesticide Products (FQ, NL, LP, BC) - discuss
- Excluded Methods TR Template status (MJ/DN/LP) - discuss
- Additional Items
- Adjourn

Discussion

- **December 12, 2024** notes were accepted with modifications.
- **Inert Ingredients in Pesticide Products (FQ, NL, LP, BC).** The leads developed a spreadsheet as a starting point for the Food Technologists, which they hope will be helpful when evaluating the various scenarios and options for inerts. It includes a summary of stakeholder input, and an explanation of the options, to help focus the possible outcomes. The MS is also interested in hosting a panel on inerts between Board meetings; perhaps in June. They are approaching this project in two phases: Phase 1 will be a discussion document for the Spring 2024 meeting that includes the spreadsheet, and Phase 2 may include some solutions (perhaps grouping the inerts by functional group), and would be presented at the Fall 2024 meeting. A member recalled feedback from public comment suggesting that the inerts be grouped into a different section of the regulations. The MS will discuss further and vote on the next call.
- **Excluded Methods TR Template status (MJ/DN/LP).** The group discussed the TR template status. The templates have been through several iterations, and have been modified with feedback from stakeholders and the Organic Materials Review Institute (OMRI), who currently writes the TRs. The process has been long, and the MS is unanimous in their sentiment that they are ready to be implemented. One member suggested minor edits regarding microorganisms, and the lead suggested it might be better to encourage future Boards to address questions about fermentation. after NOP makes a determination about inerts. The addition of these questions is really about feedstocks, and could be seen as creating policy where none exists. Also, it's not clear how certifiers would use that information. Two other members suggested a question about ancillary substances. The lead will add minor changes and submit the document to the NOP.
Additional Items. Research priorities. The MS will divide the lists in each Subcommittee into two categories: top priorities and ongoing research. This way, it highlights topics for researchers.
- **The meeting was adjourned**

[Previous MS Notes](#)

Future call schedule (2nd Tuesday 1:00 PM ET | 10:00 AM PT, except where noted)

December 12, 2023

Inert Ingredients in Pesticide Products (FQ, NL, LP, BC)

January 9, 2024

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February 13, 2024

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