

**Formal Recommendation by the
National Organic Standards Board (NOSB)
to the National Organic Program (NOP)**

Date: April 29, 2011

Subject: Ethanol and isopropanol for relisting on the National List
205.601(a) As algicide, disinfectants, and sanitizer, including
irrigation system cleaning systems (1) Alcohols. (i) ethanol (ii)
isopropanol as part of Sunset 2012

Chair: Tracy Miedema

The NOSB hereby recommends to the NOP the following:

Rulemaking Action X
Guidance Statement
Other

Statement of the Recommendation (Including Recount of Vote):

The Board recommends the continued listing of ethanol and isopropanol on 205.601 Synthetics substances allowed for use in organic crop production by a count of 0 no and 14 yes votes.

Rationale Supporting Recommendation (including consistency with OFPA and NOP):

Both Isopropyl and ethanol were recommended for addition to the National List on 205.601 on 11/1/95 at the Fall 1995 NOSB meeting. There were TAPs done in 1995; Ethanol was originally reviewed by Vivian Purdy and John Clark and the vote to list was unanimous; Isopropyl was reviewed by Vivian Purdy, John Clark, and Marta Engel and the board vote was to list 13 in favor, one opposed. A new TR was requested by the Livestock committee for the 2012 sunset cycle and the Livestock Committee also recommended relisting of alcohols for 2012.

There was a discussion by the NOSB surrounding the Livestock relisting at the Nov. 2005 NOSB meeting about whether organic ethanol could be used. Apparently pharmaceutical grades of alcohol are synthetically produced, and The NOP reminded the board that it is listed as a synthetic and does not have to be organic. There was discussion about how wide spread the use of alcohol is in veterinary medicine in swabs, wipes, surface sanitation, as a solvent, etc. There was also a reminder from The Program that this is not a food.

These materials are used widely as sanitizers, extractants, and inerts, and also are taxable as liquor. They can be made naturally or synthetically and were listed originally so it was clear that either form could be used. Comments specific to these materials during this round and the last round of sunset were all in favor of relisting.

NOSB Vote:

Moved: John Foster		Second: Tina Ellor		
Yes: 14	No: 0	Abstain: 0	Absent: 0	Recusal: 0

**National Organic Standards Board
Crops Committee
2012 Sunset Proposed Recommendation
Ethanol and Isopropanol on §205.601**

March 2, 2010

List: §205.601 Synthetic substances allowed for use in organic crop production.

- (a) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems.
 - (1) Alcohols.
 - (i) Ethanol
 - (ii) Isopropanol

Committee Summary

These materials are used widely as sanitizers, extractants, inerts, and also are taxable as liquor. They can be made naturally or synthetically and were listed originally so it was clear that either form could be used. All comments specific to these materials during the last round of sunset were all in favor of relisting.

Committee Recommendations

The Crops Committee recommends the continued listing of Ethanol and Isopropanol on 205.601 Synthetics substances allowed for use in organic crop production as algicide, disinfectants, and sanitizers including irrigation system cleaning systems.

Committee Vote

Motion: To relist ethanol and isopropanol on § 205.601.

Motion by: Tina Ellor Second: Colehour Bondera

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