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

Date: April 29, 2011

Subject: Sunset 2012 List on §205.601 Synthetic substances allowed for use in organic crop production (g) As rodenticides (2) Vitamin D₃

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 NOSB recommends the relisting of Vitamin D₃ as rodenticide on §205.601 Synthetic substances allowed for use in organic crop production by a vote of 14 yes and 0 no.

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

The Crops Committee requested a new Technical Report for this material for this round of sunset. Following a discussion of the new TR and concerns about whether current regulation sufficiently prevents inadvertent harm to non-target species, the Crops Committee recommended that Vitamin D₃ remain on the National List §205.601 as a rodenticide as there are very few alternative materials allowed for this use in organic crop production. Public comments were all in favor of the continued listing of Vitamin D₃ for this purpose.

Committee Vote:

<table>
<thead>
<tr>
<th>Moved: John Foster</th>
<th>Second: Steve DeMuri</th>
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<tbody>
<tr>
<td>Yes: 14</td>
<td>No: 0</td>
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<tr>
<td>Abstain: 0</td>
<td>Absent: 0</td>
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<td>Recusal: 0</td>
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Updated June 17, 2010

(g) As rodenticides
(2) Vitamin D$_3$

Committee Summary

The Crops Committee requested a new Technical Report for this material for this round of sunset. Following a discussion of the new TR and concerns about whether current regulation sufficiently prevents inadvertent harm to non-target species, the Crops Committee is recommending that Vitamin D$_3$ remain on the National List §205.601 as a rodenticide as there are very few alternative materials allowed for this use in organic crop production.

Committee Recommendations

The Crops Committee recommends the continued listing Vitamin D$_3$ on the National List §205.601 (g) As rodenticides.

Committee Vote

Motion: to relist vitamin D$_3$ on § 205.601.
Motion: Tina Ellor Second: Colehour Bondera
Yes: 5 No: 0 Absent: 2 Abstain: 0 Recuse: 0