

**FORMAL RECOMMENDATION BY THE  
NATIONAL ORGANIC STANDARDS BOARD (NOSB)  
TO THE NATIONAL ORGANIC PROGRAM (NOP)**

**Date:** 11/05/ 2009

**Subject:** Hydrogen Chloride Sunset

**Chair:** Jeff Moyer

**Recommendation**

The NOSB hereby recommends to the NOP the following:

Rulemaking Action:   X    
Guidance Statement:             
Other:                   

**Summary Statement of the Recommendation** (including Recount of Vote):

The Board recommends the continued listing of Hydrogen chloride as annotated in §205.601(n):

**(n) Seed preparations. Hydrogen chloride (CAS# 7647-01-0) – for delinting cotton seed for planting.**

**NOSB Vote:**     **Motion: Rigo Delgado**                             **Second:**     Hue Karriman

*Board vote: Yes - 12    No- 0    Abstain- 0    Absent - 3    Recuse-0*

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

Hydrogen chloride was added to the list §205.601(n), based on the NOSB recommendation of April, 2004. This product is needed to eliminate lint form cotton seed making it possible to mechanize planting of this important crop. At the time of the NOSB recommendation, chemical alternatives, such as lactic acid or acetic acid were considered ineffective. Mechanical processes, on the other hand, were not only inadequate, but resulted in considerable damage to the seed.

After contacting several academic experts from Texas and New Mexico, and communicating with manufacturers of cotton seed delinting equipment, the Crops Committee concluded that Hydrogen chloride remains the only option for organic cotton farmers and should be relisted.

In preparation for its 2009 Spring meeting, the NOSB received numerous comments from the public supporting the relisting of Hydrogen chloride and highlighting the importance of this product in the organic cotton industry. The Crops Committee found several patents for delinting equipment which had been submitted as recently as 2008 and appear to show promise; it is the hope of this Board that appropriate mechanical solutions are developed in the near future.

**Response by the NOP:**

**Attach Committee Recommendation here along that includes committee votes and any attachments**

**National Organic Standards Board**  
**Crops Committee Recommendation for Hydrogen Chloride**  
*Sunset Review*

August 31, 2009

**I. List:**

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

*(n) Seed preparations. Hydrogen chloride (CAS # 7647-01-0) – for delinting cotton seed for planting.*

**II. Committee Summary:**

Hydrogen chloride was added to the list, **§205.601 (n)**, based on the NOSB recommendation of April, 2004. This product is needed to eliminate lint from cotton seed making it possible to mechanize planting of this important crop. At the time of the NOSB recommendation, chemical alternatives, such as lactic acid or acetic acid were considered ineffective. Mechanical processes, on the other hand, were not only inadequate, but resulted in considerable damage to the seed.

After contacting several academic experts from Texas and New Mexico, and communicating with manufacturers of cotton seed delinting equipment, the Crops Committee concluded that Hydrogen chloride remains the only option for organic cotton farmers and should be relisted.

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**III. Committee Recommendations**

The Crops Committee recommends the continued listing of Hydrogen chloride as annotated in §205.601(n).

*Moved: J. Moyer      Second: K. Ellor*

*Committee Vote: Yes- 6      No- 0      Absent- 0      Abstain- 0      Recuse- 0*

Respectfully submitted,

Tina Ellor Chair Crops Committee September 11, 2009