

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

**Date:** 6-3-06

**Subject: Sunset Review - 205.601 Synthetic substances allowed for use in organic crop production**

**Chair: Kevin O'Rell**

**Recommendation**

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: XXXXXX

Guidance Statement: \_\_\_\_\_

Other: \_\_\_\_\_

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

See attached Recommendation for Renewal of Lignin Sulfonate as Synthetic substances allowed for use in organic crop production on 205.601, category use (j) as plant or soil amendments and (l) as flotation agents in post-harvest handling.

**NOSB Vote:**

**Moved: Gerald Davis                      Second: Nancy Ostiguy**

**Yes – 8**

**No – 2**

**Abstain – 2**

**Absent – 2**

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

**NOSB Sunset Material Vote**

**Response by the NOP:**

**NOSB- Crops Committee**  
**Lignin Sulfonate - Sunset Recommendation**  
**Final NOSB Recommendation 4/20/2006**

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

**II. Category Use**

- (j): As plant or soil amendments
- (l): As floatation agents in post-harvest handling

**III. Committee Summary:** The question of whether there are non-synthetic alternatives to lignin sulfonates as plant or soil amendments was an issue during the sunset process consideration. Lignin sulfonates are used extensively as a chelating agent for micronutrients in liquid fertilizer formulations approved for use in organic crops. However, no information was supplied in the public comments to suggest any non-synthetic alternatives for this very common use of the materials. Citric acid is a non-synthetic material that is considered to have a weak chelating effect when used for this purpose, but is not directly comparable to the level achieved with the lignin sulfonates.

Regarding floating agents in post-harvest handling, a comment was received suggesting that physical agitation (bubblers, etc) could work as an alternative practice to lignin sulfonate use. Subsequent comments received disputed that the use of physical agitation works in the handling of pears.

**IV. Committee Recommendation**

Recommendation based on comments received- 205.601

The crops committee recommends renewing the following material to the following categories of use:

**(j)- As plant or soil amendment.**

**(4)-Lignin sulfonate- chelating agent, dust suppressant.**

**(l)- As floating agents in post-harvest handling.**

**(1)- Lignin sulfonate.**

Moved: Rigoberto Delgado                      Second: Jeff Moyer  
Committee vote: 3-1      Absent- Ostiguy

**NOSB vote:**

Moved: Gerald Davis                      Second: Nancy Ostiguy  
Yes – 8  
No – 2  
Abstain – 2  
Absent – 2