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MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

FROM: Jennifer Tucker, Ph.D.
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National Organic Program (NOP)

SUBJECT: Response to National Organic Standards Board Recommendations (Spring 2018 Meeting)

Background

This memorandum responds to the National Organic Standards Board (NOSB) recommendations made at its meeting in Tucson, Arizona, April 25-27, 2018.

Summary of Recommendations and AMS Responses

1. Petitioned Substances and Related Recommendations. The NOSB recommended three amendments to the National List of Allowed and Prohibited Substances (National List). This section of the U.S. Department of Agriculture (USDA) organic regulations includes synthetic substances allowed in crop and livestock production, nonsynthetic substances prohibited in crop and livestock production, and non-organic substances allowed in the handling of organic products.

Substance	Section of Organic Regulations	NOSB Recommendation
Sulfur (as a molluscicide)	Crops §205.601	Classified as synthetic; recommended for addition to the National List
Polyoxin D zinc salt	Crops §205.601	Classified as synthetic; recommended for addition to the National List
Magnesium chloride reclassification	Handling §205.605(b) (current) §205.605(a) (recommended)	Re-classified as non-synthetic; recommended moving from §205.605(b) to §205.605(a)

AMS Response: AMS is reviewing the NOSB’s three National List recommendations listed above.

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- 2. Inspector qualifications.** The NOSB recommended that the National Organic Program develop minimum qualifications, continuing education guidelines, and training to ensure a professional and competent inspector pool to meet the demands of ever-evolving and complex organic supply chains.

AMS Response: In May 2018, AMS announced its action plan to strengthen the oversight and enforcement of organic products. To strengthen organic control systems, the action plan includes additional training for inspectors, specification of inspector qualifications, and specification of inspector training requirements. AMS is reviewing the NOSB's recommendation as we work to strengthen certification and enforcement processes. View AMS's announcement at:

<https://www.ams.usda.gov/sites/default/files/media/ActionUpdatePlanEnforcement.pdf>

- 3. Emergency use of synthetic parasiticides in organic livestock production.** The NOSB recommended that the organic regulations be revised to clarify when synthetic parasiticides on the National List may be administered by organic livestock producers. Current organic regulations permit the use of these medications for emergency treatment. The NOSB recommended a definition for the term "emergency" and additional language to describe the required practices to prevent parasitic infection.

AMS Response: AMS is reviewing the NOSB's recommendation.

- 4. Conversion of native ecosystems for crop production.** To prevent alteration of native ecosystems (as a means to circumvent the three-year transition required by USDA organic regulations) the NOSB recommended a new requirement to prohibit the conversion of sites that support native ecosystems to organic production within 10 years of conversion. The NOSB also recommended a definition of the term "native ecosystem."

AMS Response: AMS is reviewing the NOSB's recommendation.

Summary

AMS acknowledges and sincerely appreciates the many hours NOSB members provided in developing its recommendations. AMS supports NOSB's vital role in representing the diversity of the organic community and ensuring organic integrity.