



United States
Department of
Agriculture

Agricultural
Marketing
Service

1400 Independence Avenue, S.W.
Room 2642-S, Mail Stop 0268
Washington, D.C. 20250-0268

August 12, 2019

MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

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

SUBJECT: Response to National Organic Standards Board Recommendations (Spring 2019 Meeting)

Background

This memorandum responds to the National Organic Standards Board (NOSB) recommendations to the Secretary made at its meeting in Seattle, Washington, April 24-26, 2019.

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 organic handling.

Substance	Section of Organic Regulations	NOSB Recommendation
Oxalic acid dihydrate	Livestock § 205.603(b)	Classified as synthetic; recommended for addition to the National List with annotation - For use as a pesticide solely for apiculture.
Pullulan	Handling § 205.605(a)	Classified as nonagricultural, nonsynthetic; recommended for addition to the National List with annotation - For use only in tablets and capsules for dietary supplements labeled “made with organic (specified ingredients or food group(s)).”
Collagen gel	Handling § 205.606	Classified as nonagricultural, nonsynthetic; recommended for addition to the National List

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

MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

Page 2

- 2. Excluded Methods Determinations.** The NOSB recommended additional updates to the list of Excluded Methods Terminology that was put forth in its November 2016 recommendation. Specifically, the NOSB recommended changes to clarify when manipulation of transposons should be considered an Excluded Method and to add definitions for the terms “cisgenesis” and “intragenesis.”

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

- 3. Strengthening the Organic Seed Guidance (NOP 5029).** The NOSB recommended several changes to the NOP’s Organic Seed Guidance document (NOP 5029) at sections 4.1 Sourcing of Seeds, 4.2 Recordkeeping for Organic Producers, and 4.4 Role of Certifying Agents.

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.