

In The Matter Of:
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
FALL 2025 BOARD MEETING - DAY 1

Vol. 1
January 13, 2026



Original File 01-13-2026 vol 1.prn
Min-U-Script® with Word Index

UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2025 BOARD MEETING - RESCHEDULED

DAY 1

Tuesday,

January 13, 2026

Held via Zoom for Government

National Organic Standards Board (NOSB) Members

Amy Bruch, NOSB Chair

Allison Johnson, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Kathryn Deschenes

Carolyn Dimitri

Amanda Felder

Andrea Hatziyannis

Cat McCluskey (absent)

Dilip Nandwani

Logan Petrey Linkenhoger

Corie Pierce

Franklin Quarcoo

Kyla Smith

Javier Zamora (absent)

National Organic Program Staff, Standards Division

Erin Healy, Division Director

Jared Clark, Assistant Division Director

Andrea Holm, Agricultural Marketing Specialist

Heather Kumar, NOSB Food Technologist

Michelle Arsenault, NOSB Advisory Committee

Specialist

Jo Mirenda, Agricultural Marketing Specialist

Devin Pattillo, Agricultural Marketing Specialist

Jason Edmonson, Agricultural Economist

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2 (Time: 11:00 a.m., EST)

8 DR. TUCKER: All right. Good morning, everybody,
9 and Happy New Year. I am Jennifer Tucker, Deputy
10 Administrator of the USDA Agricultural Marketing Service,
11 National Organic Program. Welcome to all of our board
12 members and our audience online. It is my honor to
13 officially open the rescheduled Fall 2025 National Organic
14 Standards Board meeting.

25 In a few minutes, Amy Bruch, our Board Chair, will

1 facilitate Board introductions. I want to welcome all our
2 board members and thank them fully and deeply. These
3 members are all volunteers. This meeting is happening at a
4 very busy time for all of them, and we're grateful that they
5 were able to make this happen.

6 Also, five members will introduce themselves for
7 the last time here, as this is their last meeting: Amy
8 Bruch, Kyla Smith, Brian Caldwell, Dr. Carolyn Dimitri, and
9 Logan Petrey Linkenhoger. Let's thank them and the rest of
10 the board now at the start, and this is, remember how we
11 applaud, everybody, so big round of applause for all our
12 board members. And it looks like Zoom has gotten sort of
13 better reaction, so that's probably even better.
14 (Zoom applause.)

15 DR. TUCKER: So next, I would like to introduce
16 the National Organic Program team. First, let's all thank
17 Michelle Arsenault, our Advisory Board Specialist. Thank
18 you, Michelle, for all of your work. We also have several
19 other team members from Standards here: Erin Healy, the
20 Director; Jared Clark, the Assistant Director; Heather
21 Kumar, Jo Mirenda, Andrea Holm, Jason Edmondston, and Devin
22 Pattillo. Thank you all for your work and dedication. I
23 also want to thank my deputy, Andrew Malone, who's on the
24 line, who provided really helpful continuity across NOP when
25 I was on detail with another program last spring.

1 Finally, I want to pause and acknowledge the full
2 NOP team. There are many listening with us today. Their
3 expertise, dedication, and resilience are amazing. Later,
4 I'll be giving the NOP update, and I just want to note that
5 everything I talk about during that presentation is the
6 result of this team's commitment to this community, their
7 steadfast focus on protecting the USDA organic seal, and
8 their care for each other.

9 Next, I turn the mic over to Amy Bruch, our Board
10 Chair. Amy will be introducing board members, all of whom
11 devote hours and hours of volunteer time to serve the
12 organic community. Let's give the full board a big round of
13 thanks and appreciation.

14 (Zoom applause.)

15 DR. TUCKER: Amy, I hand it to you. Thank you in
16 advance for a great meeting.

17 NOSB CHAIR BRUCH: Excellent. Thank you so much,
18 Dr. Tucker.

19 We're going to get going here, folks. Really
20 appreciate everybody's time here today and really appreciate
21 the opportunity to convene here to do this abbreviated
22 meeting. We're going to roll into our agenda, and then
23 we'll go over NOSB introductions, and that'll serve as a
24 roll call.

25 Our agenda, which Andrea is going to post up here

1 momentarily, is jam-packed for the two days. It is a bit
2 brief in limited scope, but we are looking forward to
3 tackling all the materials that you can see here before you.

4 The first part of the meeting, we'll be doing
5 general business, the introductions, as I mentioned. We'll
6 go into an NOSB report, as well as USDA NOP update with Q&A.
7 Then we will begin into our subcommittee presentations,
8 discussions, and votes, starting with Crops, then Handling.
9 We will break for the end of the day and resume tomorrow,
10 same time -- same start time, 11:00 Eastern, and we will
11 continue on with subcommittee presentations and
12 deliberations. We will be tackling Livestock right away,
13 then going into Compliance, Accreditation, and
14 Certification, followed by Materials. Then the remainder of
15 the NOSB meeting will be devoted to review of our upcoming
16 Work Agenda for our spring meeting that's designated in May,
17 our Officer Elections for the new leadership team,
18 recognition, as Dr. Tucker mentioned, of five outgoing board
19 members, and then we will discuss any Other Business and
20 Closing Remarks. So I'm excited to have this time here
21 together with the board, the NOP, and stakeholders. Thank
22 you for joining us.

23 We will start, Board, off with our roll call. So
24 with this roll call, we will plan on doing a brief bio, so
25 definitely touch on your name, your seat, your subcommittee

1 chair, where you're located, and, if you don't mind, also
2 add what you're either looking forward to learning from this
3 board meeting or a favorite organic memory.

4 So we will be brief in our exchange here, but I'm
5 going to have Brian, thankfully, with your first name, you
6 will be kicking us off, and we'll just kind of go as the
7 tiles show here in order. So, Brian, go for it.

8 BD. MEM. CALDWELL: Well, thanks so much, Amy, and
9 I'm really so pleased to be here. I'm glad that we were
10 able to have this meeting.

11 I'm Brian Caldwell. I'm in the Public Interest
12 and Consumer Interest seat on the board, and I'm about to
13 rotate off, sort of, in a week or two, which is quite a
14 revelation to me. It's quite a -- it's like I haven't
15 absorbed that yet. But anyways, I'm retired from Cornell
16 University, where I was a research specialist on several
17 organic field vegetable and field crops research projects.
18 And I also have a small farm near Ithaca, New York, and
19 we've been certified since 1986 and are currently producing
20 apples, pears, chestnuts, and hazelnuts.

21 And, boy, Amy, I was not really -- I don't have
22 anything in my mind. My favorite -- my favorite organic
23 memory, that is really a tough one. I'm going to save this
24 for the end, but certainly being on this board is a high
25 point for sure. I'm going to have to pass, and I'll be

1 thinking about that and probably mention something when I
2 give my Livestock introduction or something, but I'm not
3 able to quite come up with it at this moment. So thank you.

4 NOSB CHAIR BRUCH: No problem. Thanks for your
5 candor. And that's one thing I really love about this
6 board, that we do have the trust and candor here. Brian,
7 thank you for your leadership and service and your
8 willingness to engage deeply on very complex topics. It's
9 been a joy serving with you.

10 We'll move on to Dr. Carolyn Dimitri.

11 BD. MEM. DIMITRI: (No response.)

12 MS. ARSENAULT: Amy, Carolyn sent a message that
13 she was running late, and I don't think she's joined yet.

14 NOSB CHAIR BRUCH: Okay, we'll try to sweep Dr.
15 Dimitri at the end. Logan.

16 BD. MEM. PETREY LINKENHOGGER: (No response.)

17 BD. MEM. SMITH: Amy, she texted me that she was
18 going to be joining, but is tending to some children duties,
19 so she'll be with us shortly.

20 NOSB CHAIR BRUCH: Okay, no problem, Kyla.

21 And just a note for the community; we are going to
22 do our best to be as present as possible. That's the
23 challenge with leaders in the community, schedules lining up
24 at the same time is a little bit challenging, but we will do
25 our best here.

1 Kyla, I can see you.

2 BD. MEM. SMITH: I'm here.

3 NOSB CHAIR BRUCH: Do you want to start? Okay.

4 BD. MEM. SMITH: My name is Kyla Smith. I am the
5 Certification Policy Advisor at PCO, an accredited
6 certifier based in Pennsylvania, but we certify across the
7 country. I've been with PCO in some form or fashion for
8 over 20 years, and I obviously am serving in the Certifier
9 seat. I am also rotating off and will share some sentiments
10 at the end of the meeting in regards to that. I serve as
11 the Chair of CACS. And served as the Chair last year -- of
12 the Board last year.

13 It's very hard to pick one favorite organic memory
14 throughout my tenure, so I think I probably -- I mean,
15 there's not one specific thing, but I just -- I think that,
16 for me, in general, the connections I've made over my time
17 in the industry is what is most near and dear to my heart.
18 I feel like this community is such a collaborative group of
19 folks, which, when people come into the organic industry
20 from outside industries, they are often surprised by how
21 collaborative and sharing, in particular, the certification
22 community is. I mean, in some regards, we're all
23 competitors, and yet we really do band together to advance
24 the industry as a whole. So I would say the people and the
25 connections are probably what's most cherished to me.

1 Thanks.

2 NOSB CHAIR BRUCH: Excellent, Kyla. Thank you
3 again for your leadership. It's just been a joy, and I've
4 loved learning from you, especially when you educate us on
5 further conversations with regulation and guidance. I love
6 your institutional knowledge. Thank you so much.

7 Allison, we're going to go to you next, if you're
8 on.

9 NOSB VICE CHAIR JOHNSON: I just walked in the
10 door. Good timing.

11 NOSB CHAIR BRUCH: Hi.

12 NOSB VICE CHAIR JOHNSON: Hi, everyone. Good
13 morning. I'm Allison Johnson. I'm a senior attorney with
14 the Natural Resources Defense Council and a very dedicated
15 organic consumer. I'm based in Oakland, California, and
16 this is my last year in the Consumer and Public Interest
17 seat.

18 NRDC, where I work, is an environmental nonprofit
19 that works to safeguard the Earth, its people, its plants
20 and animals, and the natural systems on which all life
21 depends. My work at NRDC focuses on reducing use of
22 pesticides that are harmful to pollinators and people, and
23 I'm always so grateful to see organic producers leading the
24 way in this area.

25 I currently serve as the Vice Chair of the Board

1 and the Chair of the Handling Subcommittee. And my
2 background's in sustainable food systems pretty broadly. I
3 have degrees in Nutritional Sciences, Gastronomic Sciences,
4 and Law, and before becoming an attorney, I worked in
5 Handler Certification at CCOF for about five years. Really
6 grateful to be here with you all today.

7 And my favorite, yeah, I feel like we needed a
8 heads up on this one, Amy. I made a new good organic memory
9 this morning. I polled my 6-year-old daughter about colors
10 in organic food, and I'll talk about that later today, but
11 at the end she was chanting "organic, organic, organic," so
12 it gave me good hope for the future and our next consumer
13 base that's out there. Handing it back to you, Amy.
14 Thanks.

15 NOSB CHAIR BRUCH: Excellent, Allison. Thank you
16 for the feedback. I know, we have to just dust off the
17 cobwebs here and get rolling, folks, so sorry for the tough
18 icebreaker initially. But, Allison, what joy it's been to
19 serve on Leadership with you. I really appreciate just your
20 ability to stay focused but make sure all the voices are
21 heard in our community, so thank you so much.

22 Dr. Nandwani, let's go to you next, please.

23 BD. MEM. NANDWANI: Thank you, Amy.

24 Good morning to all. Can you hear me well?

25 (No response.)

1 BD. MEM. NANDWANI: Thank you again. My name is
2 Dilip Nandwani. I work for Tennessee State University. I'm
3 based in Nashville, and I'm Professor in Organic
4 Agriculture. I've been doing this job for almost 30 years
5 now and doing research, extension, and teaching in -- for
6 land-grant universities, and I've been with TSU now the past
7 12 years. I love my job, love working with organic
8 community, love working with farmers and other stakeholders.

9 I'm on the Environmental Protection and Resource
10 Conservation seat on NOSB and at the end of the fourth year,
11 so one more year to go, and I love to be here.

12 My favorite memory, actually, it is hard to tell
13 because there are lots of good memories I can tell, and I
14 don't want to take a whole lot of time, but I would say that
15 meeting first time with NOSB board was wonderful. You know,
16 they are wonderful people. Meeting, you know, NOP as a team
17 also. I was fascinated to see how, you know, friendly they
18 are. They're well -- you know, they're cooperative, you
19 know, with all of us, and I love being here.

20 So thank you very much, and good to be here. Good
21 to see you all. Thank you.

22 NOSB CHAIR BRUCH: Thank you so much, Dilip. I
23 really appreciate that memory. I hope -- yes, I'm looking
24 forward to deliberating with you. Love your scientific
25 expertise and your thoughtful questions. Thank you so much.

1 Moving along, Javier Zamora.

2 BD. MEM. ZAMORA: (No response.)

3 NOSB CHAIR BRUCH: For the record, Javier is
4 absent. Next up is Nate Lewis.

5 SECRETARY LEWIS: Hey, good morning, folks. Nate
6 Lewis. I sit in the Resource Conservation seat. I'm based
7 in Olympia, Washington. I'm a Senior Conservation Manager
8 for the Washington Farmland Trust, where we protect
9 threatened farmland across the state of Washington through
10 conservation -- purchase of conservation easements,
11 primarily. I chair the Policy Development Subcommittee,
12 which has deferred its work to the spring meeting in an
13 attempt to try to fill -- utilize our time at this meeting
14 more expeditiously. And I will also be chairing, for this
15 meeting, the Crop Subcommittee. Logan just had a baby.
16 Yay. And happy to step into that role, to support her in
17 her new endeavor -- with her endeavor with a new one.

18 On the theme of children, I think that's one of my
19 favorite memories for at least my time on the board. Last
20 fall, I had the privilege of inviting my daughter along to
21 the meeting in Portland, Oregon, and it was really impactful
22 for her to see the work of the board firsthand. And I was
23 just really impressed with the grace and kindness that the
24 board and NOP staff had in welcoming her and engaging with
25 her and her young brain and her new ideas. And it was

1 really transformative. She started her high school's first
2 FFA chapter, maybe not as a direct result, but certainly as
3 part of the exposure she got from seeing how a functional
4 board can get things done. And she -- I'll have the
5 privilege of bringing her to Montana State University, where
6 she'll be a student starting in the fall of 2026. So the
7 apple fell close to the tree in terms of role and career in
8 agriculture. And I think the board had a tremendous amount
9 of impact on that.

10 NOSB CHAIR BRUCH: Nate, thank you for sharing
11 that. That's deeply special. I really appreciate serving
12 on the Leadership team with you, as well. And your archival
13 knowledge has really helped move forward some of these tough
14 work agenda items that we deliberate on. So thank you
15 bringing that --

16 SECRETARY LEWIS: Yeah, I'm a little --

17 NOSB CHAIR BRUCH: -- to the board.

18 SECRETARY LEWIS: I forgot to say, I do also serve
19 as Secretary of the Board, where I count to 14 or 15 very
20 well. I think. So we'll try to keep up the record here.

21 NOSB CHAIR BRUCH: Sounds good. Thanks for
22 wearing all the hats you do. Really appreciate it.

23 All right, moving along, Dr. Quarcoo. Franklin.

24 BD. MEM. QUARCOO: Right.

25 NOSB CHAIR BRUCH: Yeah. Sorry.

1 BD. MEM. QUARCOO: Yeah. Can you hear me?

2 NOSB CHAIR BRUCH: Yes.

3 BD. MEM. QUARCOO: All right. My name is Franklin
4 Quarcoo. I'm a faculty member at Tuskegee University in
5 Alabama. I sit on their -- I'm one of the Environmental
6 Protection and Resource Conservation representatives. I
7 serve as the Materials Committee Chair.

8 Still one of my favorite memories, that's my
9 experience with the board. And just working with the board
10 has been great. Learning environment, very interactive, and
11 people with different types of expertise, welcoming, so it's
12 been great.

13 The other one is, as a pest management person,
14 there are lots of them. When I encounter farmers who are
15 having pest problems in organic systems and you are able to
16 offer some technical information or assistance, and then you
17 come back and you find out that things have changed, and
18 then the light goes off. And then with my students as well,
19 just when the light bulb goes on and they understand how
20 organic is good for the world in which we live, it's just
21 great. So there are a lot of good memories, but these are
22 just a couple of them.

23 NOSB CHAIR BRUCH: Excellent. Such a pleasure to
24 have you on our board. Really appreciate what you bring to
25 the board with your technical expertise and careful

1 reasoning, Franklin. Thank you so much.

2 All right, we're moving along here, Kathryn,
3 you're next.

4 BD. MEM. DESCHENES: Hello. Hello to the Board
5 and to the organic community. My name is Kathryn Deschanes,
6 and I sit in the Handler seat. I'm wrapping my first year
7 of being on the board, so, second meeting. I'm located in
8 Colorado, working for Danone US, where I sit as the Director
9 of Regulatory Affairs. My background is in food science,
10 and I use that here at Danone in my role with Regulatory
11 Affairs.

12 Favorite memory -- organic memory, I think one in
13 particular is hard to nail down, but I want to say how
14 grateful and how much I love the organic community. Meeting
15 new folks, just every conversation and perspective reminds
16 me why I love this community so much. And I just love
17 meeting new folks, each of them with their passion and
18 curiosity and commitment. I think we have a unique
19 community, and that's what makes this so special.

20 NOSB CHAIR BRUCH: Excellent. Thank you so much,
21 Kathryn. Welcome. Thanks for sharing your memory. I echo
22 that. And also I just want to say thank you for really
23 stepping up here in your first year. You're taking on a
24 pretty complex item in CACS, and I really appreciate your
25 leadership, and I feel good where the direction of the

1 Board's heading, so thank you so much.

2 Amanda, you're next.

3 BD. MEM. FELDER: Hi. I am Amanda Felder. I am
4 in your Handler seat. I'm based in Salinas, California. I
5 am the Organic Certification Manager for Taylor Farms. It's
6 one of North America's largest salad producers. We own the
7 Earthbound Farm organic brand.

8 I will choose Option B and be different, and so
9 what I'm most looking forward to this meeting, and I'm
10 putting it out there, is that hopefully this is our last
11 virtual meeting and that we get to do in-person meetings for
12 at least the remainder of my tenure. This is the end of my
13 first year, so hopefully the next four years, and
14 infinitely, will all be in person, where we'll get to see
15 everyone, get all those fun conversations and in-person
16 public comments again.

17 NOSB CHAIR BRUCH: Excellent. Goals are usually
18 accomplished if they're well-articulated, so thank you. I
19 will keep my fingers crossed for that. And, Amanda, thank
20 you so much for joining the board. You've really hit the
21 ground running, as well. And thanks for always being
22 prepared and organized for our deliberations. I'm looking
23 forward to keeping close with the board in years to come.
24 Thank you.

25 All right, we're moving on to Andrea next.

1 MS. ARSENAULT: Amy, I don't see Andrea, yet.

2 NOSB CHAIR BRUCH: Yes. And I know Andrea was
3 scheduled -- moving around some flights so she could make
4 sure to be here today. So --

5 BD. MEM. SMITH: She just landed so --

6 NOSB CHAIR BRUCH: Okay.

7 BD. MEM. SMITH: -- en route to a computer soon.

8 NOSB CHAIR BRUCH: Excellent. Busy is a good
9 thing. So we will try to loop back around to Ms. Andrea
10 here.

11 And also Cat. I'm just going to ask if Cat is
12 here for roll call?

13 BD. MEM. McCLUSKEY: (No response.)

14 MS. ARSENAULT: She is not. Last message we got
15 was she'll see us tomorrow.

16 NOSB CHAIR BRUCH: Okay.

17 MS. ARSENAULT: She had a work conflict when we
18 rescheduled the meeting. So.

19 NOSB CHAIR BRUCH: Yes. Thank you, Michelle, for
20 providing that update. A lot of folks are doing double duty
21 here.

22 Corie, we are up to you next here.

23 BD. MEM. PIERCE: Hello, everybody. My name is
24 Corie Pierce, and I'm in the Organic Producer seat. I'm a
25 farmer in northwestern Vermont. I run a 600-acre

1 diversified crop, veggie and primarily beef cattle farm, and
2 we do a lot of different things here in the northwest corner
3 of Vermont. I'm in my first year here on the board and
4 serve on the Livestock and Crop Subcommittees. Yeah, and
5 echo the goal of hoping to be in person. It's been an
6 interesting first year to be on the board.

7 Let's see. A lot of people have talked about
8 kids, and I'll echo that sentiment, as well. We do a lot
9 with kids on our farm. And it's, to me, just hand-in-hand
10 with just the importance of passing this information on to
11 the next generation and how to do that in a way that
12 normalizes, you know, sustainable, economically viable,
13 healthy farm businesses to the next generation. As we know,
14 it's such a hard road to hoe, and trying to model that and
15 do that as well as possible. So just seeing when kids get
16 it and light up and love to try crops and try veggies and
17 try meat that's healthy and beautiful and all that. And
18 that's, I'd say probably my favorite memory.

19 And one last thing, too, is, you know, as far as
20 the organic community, it's just incredible to me how small
21 and tight it is, no matter where you are in the country.
22 And this -- being on this board is a whole new world to me.
23 And my farming world is very tight. And, like, second --
24 two degree of separation and learning more that this broader
25 community with the NOSB and the NOP, is equally small.

1 So exciting, and I look forward to the next four
2 years.

3 NOSB CHAIR BRUCH: Excellent, Corie. Very well
4 said. I love that you highlight our work is not a job, it's
5 a lifestyle and it needs to continue. So thank you so much
6 for that. And thanks for your contributions to the board.
7 You also have hit the ground running. Your whole class has,
8 and I love your attention to detail and your inquisitive
9 mind. You are always asking the best questions at the right
10 time, and I encourage everybody in this group to, you know,
11 feel free to ask questions throughout. This is our chance
12 to really deliberate and stress-test a lot of these complex
13 items that are in front of us. So thank you so much.

14 Let's see, I'm going to loop around to a couple,
15 just in case, here. I think, Dr. Dimitri, was she able to
16 join?

17 MS. ARSENAULT: No.

18 NOSB CHAIR BRUCH: Okay. And then Logan. did we
19 get her?

20 (No response.)

21 NOSB CHAIR BRUCH: Nope. Okay. That's okay. We
22 will be hearing from Dr. Dimitri, Logan, and Andrea here as
23 the day goes on. And we get to -- as Michelle said, we'll
24 be catching up with Cat tomorrow. So that completes that
25 task. Except for myself.

1 I am Amy Bruch. I'm the Chair of the Board. I'm
2 a sixth-generation farmer from eastern Nebraska sitting in
3 the Producer seat. I am in my fifth year, and I say that
4 with sadness, but I'm just so honored. It's gone by really
5 quickly. Just blink. You know, it's a five-year term, but
6 it's 10 meetings, then you start slicing and dicing, it goes
7 pretty fast. So really immerse in the moment and enjoy and
8 map out. That's my, I guess, advice to the next class; kind
9 of, map out how the next five years will go and some of the
10 goals, like we talked about, setting those early and
11 articulating them. So thank you so much.

12 I've had about two decades of work in agribusiness
13 and had the opportunities to go overseas and live overseas
14 and see ag from different viewpoints. But my favorite job
15 is being a farmer on my family farm, and I take that
16 position very seriously.

17 Let's see. I just want to echo everything that
18 was said. I love the continuity and thinking of the next
19 generation. One of my, just favorite memories of this
20 community is just a sense -- a strong sense of family. I
21 feel like there's support in our community and systems and
22 the ability to think differently and be in a safe
23 environment to make sure we have common goals, but we think
24 differently to achieve them. And I think that that produces
25 the best result at the end of the day. So it's such a

1 pleasure to be a part of this, and I really appreciate
2 everybody welcoming me into this community over the years.

3 With that, that concludes our roll call. So thank
4 you. I'm glad everybody was able to share a little bit more
5 about yourselves. It's important to do that in a virtual
6 setting, and hopefully, as Amanda said, we'll be in person
7 in the future, and that'll make an even more solid
8 connection here with everybody.

9 Moving on to our next item of business, I'm going
10 to turn the mic over to Nate, our Board Secretary, for the
11 Secretary's Report.

12 SECRETARY LEWIS: So, in addition to counting to
13 14 or 15 every meeting, for every vote, I also have the
14 privilege of asking board members to review the minutes that
15 were provided to us from the last meeting and to provide any
16 updates or edits that are needed. So, with that, I'll open
17 the floor to any board member who has any updates or edits
18 to the minutes. Kyla.

19 BD. MEM. SMITH: Yes, I have one minor correction.
20 In the Secretary's Report section, the first sentence
21 states, each of the 14 NOSB members introduced themselves.
22 I believe that should go in the previous section of Call to
23 Order, Introductions, and Opening Remarks. That's it.

24 SECRETARY LEWIS: Noted. And thank you, Kyla, for
25 your detailed review of that.

1 Any other updates or edits?

2 (No response.)

3 SECRETARY LEWIS: All right, hearing none, with
4 that correction, the minutes are approved as amended.

5 And I'll turn it back over to you, Amy.

6 NOSB CHAIR BRUCH: Thank you, Nate. Really
7 appreciate that.

8 We'll keep moving along here. Right now we're at
9 the NOSB Report. I'm going to say some brief comments here
10 and then pass it over to Allison. And then at the end of
11 this section, I'll provide some initial housekeeping or
12 administrative updates, as well.

13 And I do have -- it just wouldn't be normal if I
14 didn't have a handful of slides, but these slides are just
15 some photos and memories of my farm and of the last few
16 years that I wanted to share with you. So Andrea's just
17 going to kind of scroll through these, and there's just some
18 pictures. And the first slide is just exactly where,
19 central Nebraska, where my home base is. And it wasn't
20 too -- it's -- I guess it wasn't, and isn't, too far away
21 from Omaha, just as one point of reference there.

22 All right. Good morning, everyone. The fact that
23 we're gathered here today, and that I get to address you as
24 Chair of the NOSB, is a credit to some of the extraordinary
25 work accomplished by the National Organic Program and every

1 single member of the Board. As an outgoing fifth-year board
2 member, I'm so honored to have the opportunity to do the
3 incredibly important work of the NOSB alongside you and with
4 the broader community.

5 I also want to take a moment to recognize my
6 fellow fifth-year board members, Brian, Carolyn, Logan, and
7 Kyla. Thank you so much. Your leadership, institutional
8 knowledge, and steady presence have mattered greatly.

9 To the executive team, Allison and Nate, thank you
10 so much for your collaborative leadership. Your ability to
11 bring clarity, alignment, and momentum has been invaluable
12 and deeply appreciated.

13 I'd also like to recognize our new members who
14 quickly are earning the distinction of no longer being
15 called "new": Amanda, Kathryn, Corie, Andrea, and Cat. You
16 are all truly wonderful and have stepped up in a meaningful
17 way and are already shaping the future of this board.

18 And to our continuing members, Franklin and Dilip,
19 thank you so much for providing the technical foundation and
20 continuity that will be so important as the board moves
21 through another significant transition.

22 I want to thank Michelle, the glue that holds us
23 all together. Thank you so much. And the broader NOP team:
24 Erin, Joe, Heather, Andrea, and Jared, your behind-the-
25 scenes work, responsiveness, and commitment have enabled

1 this board to operate at a high level.

2 And finally, thank you to Dr. Tucker for your
3 leadership of the National Organic Program, and for being a
4 thoughtful, steady partner to this board. We are grateful
5 for your commitment to organic integrity, and we are
6 fortunate to have your leadership as we continue this work
7 together.

8 There will be additional opportunities to reflect
9 on how meaningful this meeting really is. But this morning,
10 I'd like to begin by sharing a short story. If you drive
11 west on I-80 from Lincoln, Nebraska, in August, within about
12 an hour you'll pass a small town in a sea of really
13 beautiful corn and soybean fields. If you blink, you might
14 miss it. But what you won't miss is how strong those crops
15 look. The landscape shaped how I understand farming,
16 productivity, innovation, and pride in doing things well.

17 Growing up in York, I was surrounded by farmers in
18 a highly competitive area who pushed the envelope, chasing
19 better yields, growing the best seed, maximizing production
20 with irrigation. York County is actually one of the largest
21 conventional seed corn producing areas in the country. My
22 grandpa was one of the first farmers to bring the concept of
23 irrigation to our area in the 1940s. And when he was
24 looking for better markets for his crops, my dad was
25 integral in bringing one of the first seed corn production

1 facilities to York County. Watching my dad, my best friend,
2 innovate and work hard every day of his life, I wanted
3 nothing more than to farm alongside him and build on his
4 legacy. But like many young farmers, the path forward meant
5 leaving home first.

6 After you finish -- or I finished my agricultural
7 engineering degree at Iowa State -- Go Cyclones -- the
8 advice to young people in the Midwest who wanted to farm was
9 to go abroad. Brazil was the next frontier. After a few
10 years in industry, I married my college sweetheart, who I
11 met in agronomy class, and joined my husband, who was
12 already farming in Brazil. We made a go of it in a small,
13 remote frontier town which was about five hours away from
14 modern conveniences. My dad actually loved visiting us in
15 Brazil. He visited me more there than when I lived in Iowa
16 because with a long growing season, you could raise two
17 crops a year in most places and have two chances to test
18 ideas.

19 During our time in Brazil, my husband and I
20 gravitated towards the teachings of Neil Kinsey. As we
21 worked to transform challenging soils in Brazil and later in
22 Africa and Florida, amongst other places, we learned that
23 agronomy and patience can restore land into thriving,
24 biologically active principles -- or biologically active
25 soil that later became the foundation for my family's

1 transition in organic production. But farming there also
2 taught us something critical. In the conventional ag space,
3 there can be only one low-cost producer, and scale
4 eventually dominates. And in Brazil "build big" took on an
5 entirely new meaning, where some of the first- and second-
6 generational family farms operated more than a million
7 acres.

8 In 2012, just before harvest and after one of the
9 hardest droughts in the Midwest, my dad was called to his
10 Forever Home in Heaven. He left a forever vacant space and
11 a family farm that not only needed a farmer, but continued
12 innovation if it was going to survive for generations to
13 come. Farming in my dad's memory and working alongside my
14 husband to set up the next generation for our two sons is
15 both the honor of a lifetime and a profound responsibility.
16 It's one I don't take very lightly. Every decision we make
17 on our farm is shaped by that legacy, and by the hope that
18 the opportunity to farm can endure for generations to come.

19 In 2015, my husband and I packed up and came back
20 to the United States full time, but in different states. It
21 was around this time that I started to hear more about
22 organic farming. While my husband managed a citrus-to-corn
23 farm conversion project in Florida, I farmed my family's
24 acres in Nebraska and began researching what organic farming
25 might look like on our operation. If we were going to keep

1 the family farm and continue operating it after my dad
2 passed away, I believed we needed to harness the spirit of
3 innovation, and organic felt like the path to do it. That
4 belief, though, was tested quickly. Even with my agronomic
5 grounding, my first attempt at organic production on my
6 family farm was very humbling. I found myself staring down
7 a poor-looking stand of my first transition-to-organic
8 soybeans in 2017 and asking, "What am I doing wrong here?"
9 So I actually went to the Organic Integrity Database, and I
10 searched for organic farmers in Nebraska and cold-called
11 another organic farmer and just asked, "What's the secret to
12 growing respectable organic beans?" This was one of the
13 first interactions I had with the organic community, and
14 it's something that I will never forget. Instead of
15 skepticism, that farmer became my mentor and one of my
16 biggest cheerleaders. I learned quickly that cheering for
17 your fellow farmer is a defining trait of the organic
18 community. My husband jokes that my organic farming friends
19 are my support group. And while I laugh, there's so much
20 truth to it.

21 Since that first call, nearing a decade ago, my
22 organic community has expanded dramatically, my organic
23 yields have improved, and I actually love growing organic
24 soybeans. And I've seen firsthand that the opportunity to
25 succeed in production agriculture isn't just limited to the

1 very biggest operations. Every day I watch
2 multigenerational and new farms alike realize that organic
3 offers a path to staying on the farm. Few things strike me
4 as extraordinary then watching what good the organic promise
5 can do for rural communities. It's a real rural stimulus.

6 While working through my transition, I got
7 involved with grower groups and organic organizations who
8 are helping organic farmers make the transition and find
9 stable footing. Farmers often told me that they loved
10 organic markets, not because it was always the highest
11 price, but because it was steady. Steady because we need to
12 rotate crops. Steady because we know our customers and
13 consumers. And steady because we feed the soil. Organics
14 was a good deal for a farmer, a good deal for the land, and
15 for the consumer.

16 One of the things I love most about organic
17 farming is it allows me to marry the principles and my
18 great-grandfather's methods of farming with today's modern
19 technology. High mechanization, strong agronomics, and
20 sound management allow my farm to be efficient and to be a
21 real low-cost producer of quality organic grains, while
22 still farming in a way that honors land.

23 Around 2019, I started to notice that this deal
24 was starting to come apart. These steady markets were being
25 disrupted by an influx of imported organic grains from some

1 of the countries that I had firsthand experience farming in.
2 That's when I realized that production alone isn't enough.
3 Policy matters. I reached out to people working in organic
4 policy and asked, "What can we do?" And just like farmers
5 that welcomed me into the organic community and taught me
6 about organic production, the policy community immediately
7 welcomed me and taught me how we, together, can affect
8 change for the better.

9 When I was appointed to the NOSB, I discovered not
10 only brilliant organic farmers cheering one another, but
11 dedicated public servants and stakeholders working every day
12 to ensure that policies supporting organic farmers are
13 strong and credible. I learned the work of the Board was to
14 safeguard the organic promise and hear the challenges of the
15 community working so hard to farm and ensuring an even
16 playing field. I also learned what a community looks like
17 when there is so much hope. Hope showing up in the form of
18 farmers calling in for public comments from the tractor
19 saying, protect organics so my kids can also farm. In the
20 midst of it all, my fellow board members expressing hope
21 through tireless dedication.

22 To the five babies and one angel baby born to
23 board members during my term, I look back at these years
24 with awe. I believe while there is still much to do -- a
25 good problem to have -- we have honored the hope of our

1 community. Each and every one of my fellow board members
2 has worked diligently to identify positive change in order
3 to protect organic integrity. I'm so blessed to be with you
4 all today. Thank you. The work continues, and it does
5 matter.

6 Welcome to the Fall 2025 NOSB meeting.

7 All right, Allison, I'm going to turn it over to
8 you for the Vice Chair Report.

9 NOSB VICE CHAIR JOHNSON: Thanks, Amy. It's
10 always so inspiring to see your farm and your family, and
11 I'm so grateful to have learned a ton from you in our time
12 together, and it's so good to be with all of you here today.

13 I can't go into this meeting without saying that I
14 want to see everyone eating organic food. And to eat
15 organic food, we must be alive. We must be safe in our
16 homes, in our communities. And we must have food at all.
17 These fundamental needs are not being met in this country in
18 this moment, and that's top of mind for me right now.

19 That said, I'm so deeply grateful to Amy and Nate
20 for leading the board through an uncertain year. I cannot
21 understate how much Amy's steady leadership has kept us
22 focused on the positive opportunities ahead, and I've been
23 so honored to be part of this team.

24 The same is completely true of Michelle and Dr.
25 Tucker and the rest of the NOP staff. Your collaboration

1 and dedication to keeping our organic sector strong and
2 stable has kept us moving, and is why we're able to meet
3 here today. We deeply, deeply appreciate your commitment to
4 public service and for keeping the Board's work on track.

5 I also want to appreciate my fellow board members
6 for your flexibility and grace. Our outgoing members are
7 going to be working up to their very last day on the board,
8 and our new members have done a fantastic job of jumping in,
9 even without the chance to meet each other in person yet.

10 As Dilip, Franklin, Nate, and I become the most
11 senior members, we have the honor of building on a very
12 strong foundation from the last few years and being part of
13 an exciting transition to the next big cohort.

14 And finally, I want to recognize the organic
15 community. The comments we receive for this meeting were
16 high quality, thoughtful, and persuasive. You all hold this
17 amazing organic brain trust, and your persistence and
18 patience have made our amazing organic sector what it is
19 today. And like the Board and the NOP staff, you were all
20 able to pivot and bring this belated meeting to life, and
21 we're so glad you're here. Big, big thanks to each and
22 every one of you. I strongly believe that an organic future
23 with healthy soil and without harmful chemicals is well
24 within our reach, and I hope every NOSB meeting, including
25 this one, gets us a few steps closer to that future.

1 We have a lot to cover in the next few days, so
2 with that, I will hand it back to Amy. Ms. Chair.

3 NOSB CHAIR BRUCH: Excellent. Thank you so
4 kindly, Allison, for those inspiring words. I really
5 appreciate your comments there.

6 And now a few administrative updates, and then we
7 will turn it over to Dr. Tucker. First off, we have alluded
8 to this, but we are very grateful for this opportunity to
9 convene in this abbreviated format to allow board members to
10 deliberate on these critical items and responsibly close out
11 business before five seniors rotate off and five new members
12 rotate on. The last 45 days have been challenging, and I
13 want to sincerely thank my board members for stepping up,
14 often working triple time. While preparing for this
15 meeting, we were also advancing Spring 2026 materials.
16 Those are due next month for our May meeting, and then
17 balancing day jobs and making space for family during the
18 holidays. It's been fast and furious. That's the term
19 we've been using often, and I appreciate the
20 professionalism, teamwork, and positive outlook throughout.

21 Secondly, the scope of this meeting; I know
22 there's been a few questions with that. I just wanted to
23 state that it is an abbreviated meeting by design. While we
24 would have liked to address everything, our full board
25 content, the Board had to make a conscious decision to focus

1 on the core areas of work with this limited runway we had.
2 Today, we will prioritize Sunsets, Proposals, and two
3 Discussion Documents with rotating members. Items not
4 discussed today will actually be taken up at the Spring
5 meeting, and many of those documents will be refreshed,
6 based on the outstanding public comment that we did receive.
7 That was the one shining light about this situation. We
8 actually had extended time in reviewing your comments, and
9 we really appreciate all the contributions we received.
10 Forward progress is going to continue. So that was the idea
11 of the scope of this meeting.

12 Third, Leadership elections will be taking place
13 tomorrow, and we will be reviewing how we are going to be
14 proceeding with that at that time. There will be an online
15 vote for those.

16 And then finally, I wanted to just have a moment
17 of remembrance. Before we begin, I would actually like to
18 pause for a moment of silence in remembrance of a former
19 NOSB board member, Michael Sligh. We honor his service and
20 lasting impact on the organic community. For those joining
21 online, please feel free to share a memory in the chat
22 regarding Michael, or any other organic family member that
23 we lost this past year.

24 (Moment of silence.)

25 MR. LATIMER: All right, thank you so much.

1 And with that, I'm going to turn over the mic to
2 Dr. Tucker for the National Organic Program Update. Thank
3 you.

4 DR. TUCKER: Thank you very, very much, Amy, and
5 to all of our board members. I think we will also have a
6 lot of heartfelt comments tomorrow in our farewells. I want
7 to personally thank you for your leadership over the past
8 five years, and particularly in your role as Chair. So
9 thank you so, so much.

10 Okay, we're now going to turn to the National
11 Organic Program Update for the NOSB. This is our
12 rescheduled Fall 2025 Meeting, but the update is current.
13 Next, please.

14 First, I wanted to share what our key program
15 priorities are. And so these are the areas where we are
16 focusing the most time and attention in allocating resources
17 and energy. Number one is import oversight, so we'll be
18 talking a whole lot about import oversight. That's already
19 been a topic that has been brought up, and so we want to
20 make sure we're touching fully on that.

21 Technology and reporting is huge for us. The
22 Organic Integrity Database is an absolutely mission-critical
23 core system, but investing in that technology and keeping it
24 up and running, given the complexity of that tool and what
25 it's become, takes a lot of time, care, and focus.

1 Reporting is also a key program priority, given where we are
2 with technology.

3 Certifier oversight and collaboration. I think I
4 already mentioned, sort of, this tension between a
5 competitive environment but also collaborative environment.
6 We see that across certifiers all the time, and we mirror
7 that in that we do audit our certifiers, but we also
8 collaborate with them to move certification forward.

9 Enforcement and appeals continue to be key program
10 priorities. We are focusing on streamlining certification
11 right now. A big project, and that is the Common Organic
12 System Plan, so I will be talking about that a little later
13 in this presentation.

14 Supporting the NOSB, the National List rules.
15 Again, I think it is a testament to the team's dedication
16 that we're having this meeting. And so the Board coming
17 together, the Program getting this meeting up and running,
18 the Administration, this has to go through a million steps
19 to get a meeting approved, and you know, there was just a
20 tremendous amount of support for coming together. So I want
21 to, sort of, highlight that us being here reflects the high
22 priority that we place on the NOSB.

23 And we are continuing to both learn and advance
24 new Administration policy priorities. So that's reflected
25 in our Key Program priorities, as well as other projects

1 that are moving ahead.

2 I do want to say that I really appreciate the
3 tributes coming in on the chat, and so I think the chat
4 remains open. And so it's hard to -- I know it's hard to
5 focus on two things at once. I do want to echo just the
6 kind words that are coming in about both Michael and others
7 in the community. A little cognitive dissonance there in
8 terms of, sort of, content there.

9 Okay, can we get to the next slide, please? Okay,
10 let's take a look at some Import Oversight successes,
11 because we really are having a lot of successes. It can
12 feel like a lot when we look at import numbers, and it is a
13 lot, and yet we want to be celebratory in the work that we
14 have done and that we are doing to protect the seal and to
15 block fraudulent products from coming in. So I think we are
16 truly and quickly realizing benefits of the Strengthening
17 Organic Enforcement Rule. That was a series of investments,
18 regulatorily, that are having a positive impact in the
19 places that we hoped they would.

20 And so, number one, we are really maximizing
21 impact through brokers. So the broker community continues
22 to do a really strong job of not letting product in that
23 doesn't have an import certificate. Now, an import
24 certificate is not the be-all and end-all of integrity, but
25 it is a very, very important tool, and it has -- the use of

1 the import certificate has kept people out of the trade.

2 We are using Customs & Border Protection
3 authorities in a number of different places. I'm going to
4 be talking a little bit more about that as we go. We're
5 just so impressed with their ability to help us in holding
6 product where there is suspected fraud. They've been
7 helpful at ports. They literally open up boxes to see
8 whether it says "organic" on that container and helping us
9 hold the product if it didn't have the right paperwork and
10 certificates with it. So I think they've been great federal
11 partners with us.

12 The Importer-exporter Handshake is speeding
13 investigations. So for folks who have been on webinars with
14 me before, you've seen that kind of handshake between the
15 importer and the exporter. That handshake is really
16 helping. We are now not losing weeks in just trying to
17 figure out who the importer and exporter are. We have them.
18 And so that allows us to do investigations literally while
19 boats are on water. And that, in turn, helps us maximize
20 those CBP authorities, because we can actually hold
21 shipments before they arrive. And so that's a major, major
22 benefit of Strengthening Organic Enforcement.

23 The import data also inform Harmonized Tariff
24 Schedule, so HTS codes. The team has been adding a lot of
25 HTS codes. These are enormously helpful. When you have an

1 organic HTS code, it changes the mandatory filing status
2 with CBP and absolutely helps with reporting. So we are
3 able to see what is coming in, and that helps justify the
4 development of HTS codes, which in turn makes the data
5 better over time.

6 Data are supporting Risk-based Oversight. Based
7 on what we are seeing coming in and where it's coming in
8 from, we have done some concentrated country-level
9 investigation and auditing activities to go where the action
10 most is. And certifiers do continue to strengthen their
11 control systems. SOE was a really big lift, and a lot of
12 certifiers took on a lot of new clients, importers in
13 particular, and they are continuing to strengthen their
14 control systems and catch up with what has been a really
15 profound set of changes for them. We do still have work to
16 be done.

17 So let's move to the next slide. Okay, so we have
18 real challenges, and we know about those challenges. We
19 absolutely know that certifiers need to deepen their
20 capabilities and avoid overextension. While this is a
21 public-private partnership, you know, part of being
22 successful as a business or organization in organic is
23 avoiding overextension and making sure you can follow the
24 rules. So the regulatory requirements are what define
25 capacity. And so we have seen some certifiers get a bit

1 overextended in moving into, for example, countries using
2 subcontractors where that wasn't such a great idea. And so
3 we have -- spending a lot of time keeping an eye on where
4 our certifiers growing, where they're going.

5 Producer Group Oversight. SOE had the strong
6 benefit of really formalizing grower group or producer group
7 requirements. Certifiers are still getting their arms
8 around all of those requirements and making sure that they
9 are implemented. So that is an area where they need to
10 deepen their capabilities.

11 We're also seeing some challenges in their
12 implementation of exercises and interpreting mass balance
13 and traceability work. So those are requirements in the
14 regulations. They -- it is detail work. It's a lot of
15 quantitative work, it's a lot of very painstaking work, and
16 in the increasing complexity of import oversight, it is an
17 enormously important part of the inspection and the
18 certifier responsibility. That is an area where we do need
19 to continue to see deepened capabilities.

20 I mentioned some of this challenge of certifiers
21 moving into new countries without having adequate oversight
22 of subcontractors, quality of the subcontractors, and some
23 competency gaps. And so this is an area where our team is
24 spending a lot of time, again, tracking certifiers and where
25 they're going.

1 We're also spending an awful lot of time looking
2 at the Organic Integrity Database, not only from a
3 programming perspective, so making sure it is up and running
4 and serving its mission-critical functions, but also taking
5 a look at the data and what the implications are. You know,
6 so we are hearing more and more about how people rely on the
7 Organic Integrity Database, both for their own
8 investigations, but also overarching data. So as we look at
9 the data through those use-case lenses, there are some
10 challenges. And some of those challenges are, when you
11 understand the federal data landscape and requirements,
12 things like the Privacy Act, you start realizing why there
13 are some challenges with the data. But it's something we
14 need to continue to work on with certifiers, so they
15 understand the implications of how they're reporting data.
16 You know, it's one thing in a certifier's office to be
17 filling in your little spreadsheet of all your operations;
18 it's another to understand how the wiring then works to
19 aggregate that data up into a form that is useful for global
20 stakeholders.

21 We have some real challenges in enforcing against
22 international operations. With domestic operations, we also
23 have challenges, but we have databases and tools that allow
24 us to identify responsible parties and to trace activities
25 more easily than against international operations. So that

1 is a challenge for us, as international operations will, as
2 soon as they know the gig is up, they'll simply surrender
3 and then go form a new business or apply for certification
4 with a different certifier, and they, kind of, escape
5 consequences there. It's something we all really need to
6 get our arms around in terms of how we're going to address
7 this as a sector. I'm going to talk about that a bit more
8 later.

9 We do have some challenges with our equivalence
10 arrangements. I think we've talked about arrangements
11 before as being very beneficial for trade, but they also
12 come with some risks. So we do not, for example, have
13 direct enforcement authority over our equivalence partners'
14 operations. The Canada agreement, in particular, is very
15 broad, and so you can have, for example, a soy or corn
16 operation certified in the Ukraine that gets shipped to
17 Canada, maybe gets processed, and then puts -- gets put over
18 the border into the United States. At one point last year,
19 when we were looking at the numbers, about 25 percent of
20 processed soy was coming into the United States through
21 Canada, and so that is a real challenge with that
22 arrangement. We have spent a good amount of time with
23 Canada doing joint investigations and traceability exercises
24 to continue to deepen joint capabilities.

25 Data Enforcement. Reporting is both a challenge

1 and a priority. Our data comes in from Customs & Border
2 Protection, and we do checking against our Organic Integrity
3 Database for mapping of import certification codes. But
4 there are some real challenges with CBP data. Just like any
5 system that is used by human beings, there are going to be
6 data problems. So just like in the Organic Integrity
7 Database, we have some challenges with certifier data
8 reporting. CBP has the same problem. They've got brokers
9 that are entering data into the system, and that is a real
10 challenge in terms of then standardizing that data in a way
11 that is useful. So we are committed to public reporting of
12 import data, and we're working hard to figure out how best
13 to do that, while also protecting proprietary information.

14 So the bottom line is, both conceptually and
15 physically, we have a lot of places to be all at once as a
16 program. And so that's why import oversight will continue
17 to be our top priority for the foreseeable future.

18 And so somebody asked the question -- I'm going to
19 try not to look too much at the comments there, because I
20 start to cry when I see the memories of the people coming in
21 as I'm talking about protecting imports -- but I did see the
22 question, "what percentage of processed grain is coming
23 through Canada?" At one point, we did a spot check. It
24 looked like about 25 percent of soy, processed soy, coming
25 into the United States was coming through Canada. Twenty-

1 five percent. So thank you, Dilip, for typing that in.

2 Okay, let's move on to the next slide. So let's
3 take a look at some of our import data here. We have
4 consistently been running at about 3,500 import certificates
5 a week getting generated from Organic Integrity Database.
6 So that has been consistent since the system launched and
7 the full requirement for import certificates. So that's
8 more than 300,000 import certificates being run out of the
9 Organic Integrity Database. So, you know, clearly system
10 stability is an absolute top priority in keeping that system
11 up and running.

12 We are at 95 percent match between import
13 certificates generated from the Organic Integrity Database
14 and filings into Customs & Border Protection's system called
15 ACE, which means 95 percent of what comes into Customs'
16 systems with an import certificate matches a certificate
17 generated by a certifier in our database. That's very high.
18 I think when we first started we were, kind of, in B-minus
19 territory. We're kind of at a solid A here, and we do have
20 a process for looking at the patterns of the missing 5
21 percent, so we can figure out how best to follow up.

22 About 70 percent of import certificates in our
23 system are issued by USDA certifiers. Most others are
24 issued by equivalence partners in the EU, Canada, and Japan.
25 So that does mean 30 percent of import certificates are

1 issued by certifiers overseeing operations that we do not
2 directly control, okay? So that's a reality of import
3 oversight that is real important when we're thinking about
4 where to be next.

5 Let's go to the next slide. So let's talk about
6 what's actually coming in here. So this is 2025 data. So
7 2025 data. These are the top country and commodity pairs.
8 Beef is number one and number three, coming from Uruguay and
9 from Australia. We have an awful lot of fruits and
10 vegetables coming in. We've got coffee, maple syrup,
11 another coffee. So you see, kind of, repeated commodities
12 on this. And so this is, when you actually look at the
13 highest combinations of country-commodities, this is what
14 you're seeing.

15 So let's look at it in a different way. Next
16 slide. Now let's look at the top countries. And so a
17 little bit more than a third of imports are coming from our
18 partners to the north and south, Mexico and Canada. Again,
19 it makes the importance of that Canadian arrangement very,
20 very, very clear. So those are our top countries. About 22
21 countries make up about 87 percent of the imports for
22 countries with import values greater than \$100 million. So
23 kind of classic 80/20 stuff here that, you know, we have 20
24 countries that are making up about 87 percent of the imports
25 when you look at the data over \$100 million. So interesting

1 to watch those patterns over time. Again, just getting the
2 data available in forms that we can use has been a big
3 challenge, but we feel very good about the 2025 data at this
4 point in time.

5 Let's go ahead to the next slide. So the question
6 is, "Are the imports traced to origin of harvest?" No. The
7 imports -- and this is a big -- so it's a big variable. It
8 has to do with where the import certificate is generated, so
9 where the port is coming to the United States, who did the
10 import certificate.

11 Now, we're looking at a commodity listing. On
12 this one, kind of, went all the way to top 20 here. Turns
13 out, again, looking at -- if you look above that greater
14 than \$100 million threshold, we have about 30 commodities
15 that were making up about 71 percent of the imports. About
16 30 commodities making up 71 percent of the imports. Again,
17 you see the big range. Some of the same commodities I
18 mentioned before, beef and coffee are right at the top.
19 This is where you start -- when you take away the country
20 pairing, this is where you start to see those processed
21 soybeans coming in. So it is interesting that what we hear
22 about is not necessarily the largest representation of
23 imports. And so that makes risk-based oversight really
24 difficult because we would like to be focusing on the
25 commodities that the highest -- you know, have the highest

1 amount actually coming in, but there are also some
2 commodities that might have less coming in, but are actually
3 riskier because of the nature of the supply chain and the
4 nature of the commodity. And so a lot of what we're
5 learning is, you know, how do we balance all of those
6 different interests?

7 Okay, let's keep going. Okay, and so let's turn
8 to Certifier Audits, because certifier oversight is a big
9 part of what we do. This is a map that shows audits that
10 were conducted in 2025 and that are planned for 2026. A
11 total of 84 audits across 33 countries and 19 U.S. states.
12 And so a natural question is, well, how do you decide where
13 to go? You know, we have a pool of auditors that spend an
14 awful lot of time on the road, how do they -- how do we know
15 where they should go? And so one of the things we look at
16 is the accreditation cycle itself.

17 So certifiers are audited at the midterm and at
18 the renewal, so at least every couple of years. But when we
19 look at certifiers here, we're not just talking about the 70
20 certifiers, we're also talking about their offices. And so
21 we have large certifiers that have -- could have up to 10 or
22 20 offices in different countries around the country --
23 around the world. They don't all carry separate
24 accreditation. And so we're really trying to track audits
25 across more like 120 or 130 offices who touch all of those.

1 So that is a driver, is the accreditation cycle.

2 Compliance Audits. When we have certifiers that
3 we've put under settlement agreements or heightened
4 oversight, we then have more audits with them in different
5 places to make sure they've actually corrected their
6 systems. We do witness audits where we watch certifiers
7 inspect farms. So if we happen to be doing an accreditation
8 audit of one audit -- of one certifier, we may also go do
9 witness audits of operations of a different certifier that's
10 operating in the same area.

11 And then we also go to high-risk areas that we
12 identify based on complaints. Based on our assessment of
13 commodity risk, we may put boots on the ground in an area
14 that actually has a pretty low volume, but impacts the U.S.
15 market in a disproportionate way due to competitive
16 dynamics.

17 Let's move to the next slide. So let's take a
18 look at some enforcement statistics. So we talk about
19 import oversight, but part of that is also our standard
20 enforcement work. NOP, last year -- last fiscal year, so FY
21 2025, which ended last October, during the 12 months, we
22 received 755 complaints. And so of -- so that's the number
23 of complaints that came in to us as a program. Seven
24 hundred cases were resolved. Two hundred forty-one cases
25 were closed at intake, meaning that there was insufficient

1 evidence to even start, we didn't get a response when we
2 asked for more information, or it was a question rather than
3 a complaint, and somebody just used the complaint form to
4 ask a question. And so our intake team is doing a great job
5 of addressing things right up front.

6 Last year we leveled over \$845,000 in civil
7 penalties. We've really tried to focus some of those on
8 repeat violators and high-value, high-volume complaints. We
9 collect civil penalties through settlement agreements, which
10 means the operation has to be willing to pay the civil
11 penalty for us to collect it. That's part of how we do
12 enforcement here.

13 Next slide. Okay, so let's take a look at the
14 violation types, so the types of violations. We continue to
15 see more than half complaints [sic] about uncertified
16 operations, so folks who are selling as organic without
17 certification. This number has been steady since I got here
18 14 years ago. It's always been right around a little bit
19 over half of the complaints have been about uncertified
20 operations. And so we do get complaints about outright
21 fraud, livestock handling, labeling, pesticide residues,
22 prohibited substances, prohibited practices, and then
23 smaller amounts about crops. It's a little hard sometimes
24 to decide what category to put something in; the team finds
25 the violation that is most relevant to the case. So only

1 about 15 percent of the complaints that come in are about
2 international operations. So about 20 percent are joint
3 complaints about some type of trading partnership between
4 U.S. and international. And then about 65 percent of
5 complaints are about U.S. operations, okay?

6 I would have -- I would want to say that of the 15
7 percent international, some of those complaints have been
8 very, very good and have really led to some of the work that
9 we've been able to do with CBP. And so just because a
10 number is small doesn't mean it doesn't have huge impact.
11 One really solid complaint with evidence and contacts and a
12 way to really get into it can make a world of difference, so
13 I just want to highlight the importance of that.

14 Let's go on. Okay, so what happened with those
15 complaints? It seems like a little bit more than a third
16 are resolved through label updates or the marketing is
17 corrected. You know, about 10 percent of the time, a little
18 bit more than that, the allegation isn't substantiated. So
19 it could be we investigate. It could be, for example, a
20 competitor put in a complaint, it ends up not being valid.
21 Or somebody complains that a certain substance is being
22 used, where actually that substance is allowed. So those
23 types of things.

24 We do refer cases to other offices when
25 appropriate. So we refer about 5 percent of our cases over

1 to the California State Organic Program, but we also refer
2 cases to other partner countries when it's under an
3 equivalence arrangement.

4 Let's go ahead. Okay, I'd like to walk through a
5 couple of investigation case studies, because I think it
6 helps illustrate, kind of, how the team approaches these
7 things and what some of the outcomes are. So I'm going to
8 cover both an import investigation, but also a domestic
9 investigation. Import oversight is absolutely our top
10 priority, but we have domestic violators, too. And so
11 balancing all of those investments to make sure that the
12 market is as fair as we possibly can is, kind of, the key
13 balancing act and priority.

14 So the import investigation involves West Africa.
15 We put out a West Africa directive compelling certifiers to
16 do additional oversight. But we also have been reviewing
17 import data from -- particularly from that region and the
18 different supply chains. And so together, those provide us
19 with very good insight into things like high-risk organic
20 soybean supplies originating in West Africa. So we reviewed
21 import data and identified anomalies for imports of about
22 878,000 pounds of organic soybean meal. It was actually
23 imported through Canada. And so, in collaboration with the
24 operation's certifier, we started an investigation of the
25 importer, who was a U.S.-based distributor of large volumes

1 of organic feed ingredients. So that importer was handling
2 soy products valued at \$1.6 million in one month.

3 I do want to pause here and really emphasize that
4 when we talk about import oversight, we're also talking --
5 we're often talking about the exporting entity and all those
6 long supply chains, but I want to really emphasize someone's
7 buying this, and they're buying it in the United States, and
8 so there has to be a rebalancing of accountability for this
9 system to continue to work.

10 So the investigation confirmed that the operation
11 imported soybean meal of West Africa origin. They did not
12 have a required NOP import certificate, so they were
13 violating the organic regulations. We found multiple
14 systemic failures in the operation's Organic System Plan,
15 including a history of sourcing products with detected
16 prohibited substances and inadequate internal controls,
17 including supplier verification and recordkeeping. And so
18 the certifier issued adverse actions and executed a
19 settlement agreement to bring the operation into compliance.
20 And the operation did not sell that material as organic.

21 Okay, so we have been able to issue, once material
22 comes into the country -- we try and stop it before it comes
23 in or hold it before it comes in -- but when we can't and
24 it's here, we do use the tool of Notice of Inorganic
25 Purchases and let them know that that product is not valid

1 for organic sale. The certifier did issue adverse actions,
2 executed a settlement agreement, again, to bring the
3 operation into compliance.

4 We also initiated an investigation of a supplier
5 located in West Africa and referred the investigation of the
6 Canadian distributor to our trade partner government in
7 Canada. So again, we can't go after a Canadian-certified
8 operation operating in another country; Canada has to do
9 that. But we are partnering more with Canada to tighten
10 those systems.

11 So in the end we had stronger both NOP and
12 certifier collaboration. The certifier increased their
13 capability. The producer did come into compliance and did
14 not sell the product as organic. We also had more
15 collaboration and capability development with Canada through
16 the course of the investigation.

17 So domestically -- and this is a fairly, I'll be
18 honest, a fairly common type of investigation --
19 domestically, we have operations who surrender. So this in
20 particular was an operation who surrendered organic
21 certification but then continued to sell non-organic green
22 beans as organic after it surrendered. So we did issue
23 civil penalties, and we did receive payment after the
24 operation corrected the violation. They stopped selling as
25 organic. They also entered into a settlement agreement with

1 us, imposing heightened oversight. So that helps us ensure
2 compliance in the future. So if the operation violates the
3 settlement agreement, it will be acknowledged as a willful
4 violation. Their certification would be revoked.

5 We are starting to use stronger terms in
6 settlement agreements to look out. So we're going to get
7 you back in good standing now, but if you have another set
8 of violations, we're going to skip some steps, and you agree
9 to skip some steps through the settlement agreement. So we
10 think that that does a better job of compelling longer-term
11 compliance rather than having to really start over each
12 time.

13 Let's keep moving on. Okay, let's talk about
14 Holds through Customs & Border Protection. Again, they've
15 done a really, really nice job with us. So we partner with
16 CBP to detain, destroy, or redirect product when there's
17 evidence that an imported organic shipment is fraudulent.
18 And so last year, we worked with CBP to seize or deny entry
19 of more than 20 metric tons, more than 2300 packages of
20 products valued at over \$20,000. Approximately 12,000
21 metric tons of product, or 7.7 million, were diverted from
22 organic trade into the conventional market. These happened
23 to be soybeans.

24 And so both of these cases I'm talking about here
25 involve soy. We've stopped it in two ways: number one,

1 through notice of you can't sell that as organic if it's
2 already in the country; but in this case, we were able to
3 divert the product through CBP. So we have both of those
4 levers. And this costs money. If CBP is having to hold
5 product to do an investigation, there are a lot of folks who
6 incur a lot of money to do that, and so that is hopefully a
7 motivator for importers who have to pay these fees to
8 perhaps be a bit more diligent in what they're buying. So
9 examples of blocked commodities and products include
10 soybeans, protein powders, coffee beans, tea, specialty
11 cooking oils, and dried spices.

12 Okay, let's go to the next slide.

13 I'm going to stop for just a second and have a
14 glass of water. So this is Jenny breathing time, because
15 that's been a lot of content. And so we're going to let
16 everyone, kind of, take -- soak all that in, and then we
17 will finish the presentation.

18 (Pause.)

19 DR. TUCKER: Okay, we are all breathing in and
20 out.

21 We're switching gears a little bit now, so now
22 we're going to be talking about streamlining certification.
23 So we've got two problems here, right? We want to stop all
24 the -- we want to stop fraud, right? Fraud is never
25 acceptable, and we need to stop it. At the same time, we

1 want to apply sound and sensible and risk-based approaches
2 to streamline certification for farmers who are playing by
3 the rules. You know, we have an awful lot of domestic
4 organic farmers who are really doing the right thing and
5 trying really hard, and we've gotten a lot of feedback that,
6 you know, they, kind of, got swept up in these SOE
7 requirements in ways that we weren't frankly expecting.
8 That our impact was not intended to be on these small
9 domestic farmers who -- that are working in local markets or
10 regional markets. But because of OSP updates, Organic
11 System Plan updates, the burden on them, unfortunately, has
12 gone up. And so we want to find new approaches to
13 streamline this for folks playing by the rules, to reduce
14 the paperwork burden. But we also need to be able to catch
15 bad actors and deter fraud, and we do know that we have some
16 domestic fraud, right? We have a team that continues to do
17 livestock investigations that's primarily focused on the
18 domestic market. And so there are challenges in the
19 domestic market, as well as the import market.

20 So this requires changes and action at all levels.
21 So we are changing how we're approaching accreditation
22 audits in terms of taking risk-based approaches to which
23 files we look at, for example, changing our approach to
24 talking to staff, asking different questions to compel
25 different answers; and talking about, you know, kind of,

1 what risk-based oversight might look like. Certifiers are
2 starting to apply this as well. We've had some certifiers
3 recognize that they went a bit over the top in SOE, because
4 they needed to learn it too, right? Anytime you're learning
5 something new, it's much harder to make things shorter than
6 it is to make it longer. "I need to understand this, and to
7 understand it, I need to get my arms into it, and that's
8 going to lead to something longer." There are very famous
9 quotes about it's much harder to write a two-page paper than
10 it is a 200-page paper. And so, you know, this plays out as
11 people are learning and implementing regulations as well.
12 We have one certifier that's reported that they've reduced
13 the size of their OSP by a tremendous amount just by
14 relooking at what is actually required here?

15 Another thing that we're hoping with a common
16 OSP -- I'll talk about it in a couple minutes here -- is a
17 bit more standardization so everybody can see what does a
18 compliant baseline OSP actually look like, given all the new
19 rules that we have done? Our template for our OSP on our
20 website is very old and needs to be updated. And then so
21 part of this in streamlining certification is also getting
22 back to basics of what do the regs actually require and what
23 does that actually look like in an OSP?

24 But it also requires change in action from organic
25 sector participants. And so somebody chatted in a comment

1 about the balance of accountability, and I love this
2 statement: "Prosecution of the provider proves far less
3 effective in curbing the practice than does prosecution of
4 the customer." Now that we are moving into the second year
5 of SOE, we are really refocusing or starting this next stage
6 of, okay, now what do we do? Now, what we need to do is
7 really make sure that importers fully understand their
8 responsibilities as the buyers, you know, contact a
9 representative here in the United States, and what their
10 certifiers are responsible for. So we have certifier
11 training -- we do annual certifier training -- we're going
12 to do that next week, and that's -- a big focus is, what is
13 the requirement for importers and how are certifiers
14 supposed to oversee that?

15 That is our leverage point; it's the folks in the
16 United States who are buying this product. But that means
17 organic sector participants can make a big difference here.
18 And so it used to be, "Ph, I have an organic certificate, so
19 I'm fine." Now it seems to be, "Oh, I have an organic
20 import certificate, so I'm fine." That's not enough. In
21 this system, there has to be due diligence on the buyer
22 side. The sector has to be responsible for its own success.
23 And so we often talk about the public-private partnership of
24 organic in terms of standards, you know, coming together,
25 like in this meeting, to set the standards together. We

1 also talk about it in terms of certification through the
2 public-private partnership. We also have to think about it
3 in terms of self-regulation and reporting and industry-
4 driven oversight. That we know these supply chains are
5 long, we know they're complicated, and people are buying it
6 anyway. They think it's, "Well, I got a really good deal
7 here." Not okay. Not okay. And as long as the sector
8 thinks it's okay and allows it to happen, we're going to
9 continue to have problems.

10 So NOP is going to do, and continues to do, the
11 absolute best we can to control all the levers that we have.
12 But ultimately, a lot of this is in the buyers' hands, and
13 those buyers are here in the United States. So the question
14 is, who do you want to support, and how do you want to
15 support it?

16 Let's go to the next slide. I'd like to talk a
17 little bit about the Common Organic System Plan. So last
18 time we met in person, I, kind of, did a bit of a plea. It
19 was a need and call for action at the Fall 2024 meeting
20 about looking to the community, looking to the sector, to
21 help develop a Common Organic System Plan that could work
22 for both large and small operations. That this is something
23 that we had been trying to do for a few years. We talked
24 about the importance of doing, but just hadn't gotten
25 anything over the finish line yet. So we kind of opened it

1 up and said, who wants to work on this? And a coalition has
2 come together, very informal, to work on a document. And so
3 this is still in progress. The anticipated outcome is an
4 updated, compliant OSP template that's posted on the NOP
5 website, probably in Microsoft Word, that certifiers and
6 operations can access and download, and certifiers can
7 decide whether they want to adopt it. So it will be
8 optional. They can choose to adopt it, fold it into their
9 system; it is not mandatory.

10 You know, we've had several small certifiers and
11 state certifiers saying that they really need this as a
12 tool. So OSPs are difficult to update when there's a
13 regulation change, and the impact on smaller certifiers is
14 higher simply because of scale. And so our goal is to
15 provide a model that we at the NOP agree is fully compliant.
16 And so if a certifier adopts it, it would be considered a
17 compliant OSP.

18 So it is in development. We're getting feedback.
19 Again, this is going to be optional. We are developing a
20 long-term governance strategy. Unfortunately, as I
21 mentioned, our OSP templates are very painfully out of date.
22 We would like, since that this was a sector-developed
23 product, we would like to have a sector-driven governance
24 model where, as new rules come out or if something's really
25 not working about the common tool, that there is a group

1 that collectively provides feedback and a, kind of, formal
2 process for doing that. So this is still formative. I do
3 want to note the number of folks on the call today who have
4 been involved in this, either as initial reviewers or as
5 developers. We're not done yet. So it is in development,
6 continuing to look for the best sources of feedback over
7 time.

8 We're also aware there are technology solutions
9 that are grounded in this. But I do want to say that any
10 technology development here is happening completely
11 independently of the template that would ultimately be
12 available for free online for anyone.

13 Let's go ahead and move on. Okay, let's do some
14 Standards updates. I've gotten some good questions about
15 where we are with a National List Proposed Rule. So
16 National List Proposed Rule includes meloxicam -- oh, dear,
17 and some few other things that I did not write down on this
18 list. So somebody from NOP, if you want to paste in, kind
19 of, the core elements of that National List Proposed Rule,
20 it is now drafted and in review. So that rule has been
21 written. So based on previous National -- Board
22 recommendations for the National List, we have --

23 So somebody just chatted in, but you chatted it
24 in to the Teams. Could you go ahead and chat it in the Zoom
25 one? Can somebody copy and paste that into the Zoom thing?

1 Thank you.

2 So that rule has been drafted. It has made it
3 through legal review, which is a huge step. It now goes for
4 broader review by the Agency, the Mission Area, and the
5 Department.

6 For the Inerts Proposed Rule, we've written a Work
7 Plan that is a much more, is just a different kind of rule.
8 So it's a National List Rule, but just given the history of
9 that, we decided to put a Work Plan in review before putting
10 the rule in for review. Work Plans are important because
11 they govern whether OMB, Office of Management and Budget,
12 will need to review a rule or not. If it does, that adds
13 time to the timeframe. So those things are moving forward
14 here. We also have a Renewal Notice for the National List
15 that's also in clearance. So the team's been working hard
16 and pushing things into the system for review.

17 NOSB applications and nominations are under
18 review. We appreciate all the applications. Yeah, that
19 closed shortly before the shutdown, so it wasn't until after
20 we got back that we finished, sort of, the program side of
21 that, which is compiling the summaries of all the
22 applications and providing that in a format that the
23 Administration can, kind of, review and kind of see who all
24 the applicants are and what they bring to the table. So
25 that is now beyond the Program. So it is with the

1 Administration, and we will support their work as they do
2 their review and consideration of those nominations.

3 I do want to remind folks, these are Secretary
4 appointments. They're not Program appointments; they're
5 Secretary appointments. And so there are a lot of people in
6 the Department that will be involved in that process, and we
7 will not always be involved in that unless we get specific
8 questions.

9 I am not, on this call -- I see a question about
10 the rule -- I'm not going to go into the content of the rule
11 on this call. Just for fairness, once a proposed rule comes
12 out, everybody will have the opportunity to comment on that
13 rule. But I'm not going to go into the content on this
14 call.

15 We are continuing our Board support, both
16 administratively and technically, and we do continue to
17 discuss policy topics with a new political team. So the
18 first year of any administration is a lot of learning. And
19 so we are very pleased to have our Under Secretary in place
20 now. That's Dudley Hoskins. Under Secretary Hoskins was
21 part of the MRP -- Marketing and Regulatory Program Mission
22 Area during the first Trump Administration. He was in the
23 room when Strengthening Organic Enforcement was approved, so
24 he really understands the rule, what it was trying to
25 achieve, what it has achieved. He's also been very active

1 in Congress since then. He's over, I think for Senate
2 staff. So he's very, very aware of our issues, which makes
3 it a real, just easier and delightful process to talk to him
4 because he's incredibly smart and just a very, very good
5 thinker on the types of policy complexities that we
6 regularly deal with.

7 So let's move to the next slide. I just want to
8 say thank you. When I was thinking about this meeting and
9 thinking about all the different people who are involved in
10 this organic experiment here -- so the Program team, the
11 Board, certifiers and inspectors, certified farmers,
12 producers, processors, importers and exporters, Customs &
13 Border Protection, again, they've been a fabulous partner
14 with us. Brokers are now part of our family too. We have
15 material reviewers, we have trade associations and advocacy
16 groups. We have our Transition to Organic Partnership
17 Program partners who are continuing the good work under the
18 projects they're working on. We have those transitioning
19 farms and businesses. As well as our other federal partners
20 at EPA and FDA. So I did want to acknowledge, sort of, the
21 many, many, many hands that go into everything that we do
22 all day.

23 So I am going to now turn it over to Amy to
24 facilitate a Q&A process here. I know that was a lot, so
25 thank you for your patience.

1 NOSB CHAIR BRUCH: Incredible. Really appreciate
2 that, Dr. Tucker. Thanks for the NOP Update. The heavy
3 lifting you and your team do on enforcement and also stating
4 the need for rebalancing, accountability, that was
5 incredible.

6 I'm going to open it up to Board questions now.
7 We'll try to take about 15 minutes here for questions just
8 to be mindful for time, but I'm sure we could easily go over
9 time on our questions if you allowed us to. But I see a
10 couple hands here, Dilip, followed by Kyla.

11 BD. MEM. NANDWANI: Thanks, Amy. And thank you,
12 Dr. Tucker, for your update. Really appreciate that.

13 The question I have for you is that I like to know
14 the status of the 2022 NOSB proposal on highly soluble
15 nitrogen fertilizers. Thank you.

16 DR. TUCKER: Yeah. Thank you for the question.
17 For folks not tracking this, the Board had made a
18 recommendation -- two recommendations related to I call the
19 ammonia extracts. I hope that shorthand's okay here. And
20 so in 2022, there were two Board recommendations on this.
21 One of them was to prohibit ammonia extracts as a natural;
22 become a prohibited natural. Now, we can't do -- we can't
23 prohibit a natural without consulting with EPA and FDA. EPA
24 took actually a fairly long time to review that
25 recommendation, so we did not get an answer from EPA until

1 around mid-2023, and at that point, they could not
2 definitively support listing ammonia extracts as a
3 prohibited natural. So we're not moving forward with that
4 recommendation based on EPA's feedback.

5 The other part of ammonia extracts, I would say
6 that is under one of those -- the category of discussing
7 administration priorities. Anytime we have a new
8 administration, we look at that list of, okay, what are the
9 open items on the tracker that we use -- it's a public
10 tracker that tracks progress against NOSB recommendations.
11 Certainly a topic of discussion with the administration in
12 terms of how they would like to proceed with that item, if
13 they do.

14 BD. MEM. NANDWANI: Thank you.

15 NOSB CHAIR BRUCH: Excellent. Thank you, Dilip.
16 Kyla, followed by Brian.

17 BD. MEM. SMITH: Jenny, thanks for the updates.
18 They're always so informative. I was, like, fast fingering.

19 Given the importance of organic integrity that you
20 highlighted, has NOP evaluated whether expanding
21 transparency or controlled access to import or certificate
22 data beyond the current stakeholders, which is NOP, the
23 exporting certifier, and CBP, to include domestic certifiers
24 on the receiving and/or the private sector, and if this
25 could improve reconciliation, traceability, and fraud

1 prevention, especially in cases where viewing the shipping
2 manifests and other commercial records is obscure or
3 contains incomplete shipper or consignee identities?

4 DR. TUCKER: Yeah, thank you for the question. I
5 think there is a lot of interest in so how do we share NOP
6 import certificates with folks who need to know? And so the
7 first priority is, ultimately -- we have a handshake now
8 between the importer and the exporter through the import
9 certificate. Right now it is -- well, it is the exporter
10 certifier that generates that NOP import certificate, and
11 then the exporter gives it to the importer. What we're
12 trying to work on right now is a trigger system that will
13 allow the importer certifier to understand that they have an
14 import that is coming to an importer that they certify.

15 This stuff is incredibly complicated from a
16 programming perspective. And so the first step is to notify
17 the importing certifier that an import certificate was
18 created that lists them on the certificate. That's the
19 first step. The longer goal, and this is an out-year goal,
20 so this is not this year, it would be a future year, where
21 we would ultimately share the import certificate generated
22 by the exporter certifier with the importer certifier. And
23 so we would also ideally like to make sure that any other
24 certifiers involved, if the importer is certified by
25 multiple certifiers, getting that information to the right

1 people. This is something that has been requested by
2 certifiers. We consider it a high priority. It's also the
3 more complex the system gets, the more complex any additions
4 to the system become. And so that's where we go.

5 In terms of industry visibility, one of the things
6 we have talked about is for industry members who have NOP ID
7 and own an import certificate that is a multi-period or
8 multi-shipment certificate. Ideally, they should be able to
9 type in the certificate number and see how much is "left" on
10 their certificate in terms of tons or volume. But again,
11 that's an out-year goal.

12 One of the things we talked about years ago, and
13 this ties back to the accountability question, is are --
14 would there be benefits in an industry-driven blockchain?
15 Doesn't seem to be in much favor now, but there's certainly
16 a lot of traceability tools out there. And is it time for
17 an industry-driven traceability system where we can have
18 this level of accountability and participation in a formal,
19 verified, and trusted network? But a lot of that is not
20 going to be -- it can't be, achieved through the Organic
21 Integrity Database. It just can't be. But there are
22 potential for industry tools, and I think the question is
23 now, is it time for a trusted network, electronic, to track
24 the types of things that NOP is not going to be able to
25 track with long traceability?

1 NOSB CHAIR BRUCH: Interesting. Thanks for the
2 question, Kyla. Thank you, Dr. Tucker, for that response.

3 One thing to highlight for some new members, there
4 was a discussion document, I believe it was in my first
5 year, on a system called Organic Links that was looking at a
6 private database. So I'm just going to put that in the back
7 of your heads for future Board potential deliberation.

8 Brian, go ahead. Followed by Nate.

9 BD. MEM. CALDWELL: Yeah, thanks, Amy. And thank
10 you so much, Dr. Tucker, for that really detailed report. I
11 was really pleased to see the trajectory of your -- all the
12 NOP's efforts on enforcement and organic integrity, and I
13 know that's just going to continue to ramp up. So really
14 psyched about that, so thank you.

15 My question is, would you please give us an update
16 on the status of the Texas Department of Agriculture's
17 accreditation status as a certifier?

18 DR. TUCKER: Yeah, I'm happy to do that, and I
19 appreciate the question. Also, I'm going to talk about
20 this -- to answer your question, but I also want everyone to
21 broaden out and realize that the process we're talking about
22 here is a Standard. This is the process. And so the
23 question is, is this process working?

24 And so in February 2022 -- this is all public
25 information, so what I'm telling you is public information.

1 If you're ever interested in what is going on out there in
2 the world on enforcement, including NOP settlement
3 agreements and other enforcement activities, I just pasted
4 in a link where you can get to, kind of, an index of
5 documents that will lead you to these types of things. But
6 let me tell you a story.

7 So in February 2022, the National Organic Program
8 issued a Notice of Proposed Suspension to the Texas
9 Department of Agriculture for failure to comply as a
10 certifying agent. TDA appealed that Notice of Proposed
11 Suspension. In August, USDA denied the appeal and upheld
12 NOP's decision to propose suspension. Texas then appealed
13 that to the administrative law judge. So there was then
14 about 15 months between August 2022, when that appeal was
15 denied, and that administrative law judge hearing. So this
16 is the process laid out in the regulations. And so in early
17 2024, there was an ALJ hearing. It was that the next
18 October, so October 2024, that October, the ALJ upheld NOP's
19 proposal to suspend the TDA's accreditation.

20 TDA then appealed that decision up to the Judicial
21 Officer. So the Judicial Officer is the next step in the
22 appeals process. In February 2025, the Judicial Officer
23 referred the case back to the ALJ with a question about
24 authority. Given recent Supreme Court cases related to
25 administrative law judges, the Judicial Officer referred the

1 case back to the ALJ. So that was in February 2025.

2 So if you're keeping track of the math, that's
3 three years, so three years from the Notice of Proposed
4 Suspension to the administrative law judge receiving the
5 case back from the Judicial Officer. So at that point,
6 because it had been three years, it was decided that an
7 audit should be done to actually assess TDA's recurrent
8 status. And so the audit showed that TDA, over the course
9 of that time, had corrected the non-compliances in the
10 Notice of Proposed Suspension.

11 So if you go to the Administrative Law Judge site,
12 you will see --it's on our webpage, if you click on ALJ at
13 this link that I've just pasted, if you look at the ALJ
14 site, it's posted there, it was determined that TDA had
15 brought itself into compliance and is back in good standing
16 as a certifier for the NOP.

17 So when we talk about enforcement, this is the
18 appeals process. So this is the appeals process. We have a
19 lot of cases that, when we're zooming out to the operation
20 level, certifiers try to settle, and many, many times that's
21 successful. When it gets appealed, the process I just laid
22 through is the process that appeals go through. And so it
23 is multiple steps that take multiple times. And as long as
24 any entity continues to appeal, that's the process it goes
25 through. That's both domestic and international at both the

1 operation and certifier level.

2 The question came in, "During those three years,
3 because of the appeals process, they were able to operate as
4 normal?" Yes, that's the due process provided by our
5 regulations.

6 I do want to take a deep breath and remind folks
7 that when this program was first set up, there was a lot of
8 concern about whether the government would overreach in
9 enforcement, whether we would act against small farmers
10 in -- or anyone in an irresponsible way because it was brand
11 new. It was brand new. And so there were a whole lot of
12 appeal steps that were built into the system to protect both
13 certifiers and operations. This, however, what I just read,
14 is the outcome of that process. And I think as we're, kind
15 of, rethinking the system, we do have to ask, is that
16 working?

17 BD. MEM. CALDWELL: Thank you so much, Jenny, for
18 taking us through that.

19 DR. TUCKER: Thank you.

20 NOSB CHAIR BRUCH: Thanks, Brian, for the
21 question. Thank you, Dr. Tucker. We'll go to Nate next.

22 SECRETARY LEWIS: Thanks, Dr. Tucker. The Trump
23 administration has been pushing staffing decreases across
24 the agency, and I'm curious how you anticipate those actions
25 will affect the NOP's core work of compliance, enforcement,

1 accreditation, and standards development?

2 DR. TUCKER: Yeah, thanks for the question. I
3 mean, first and foremost, I think it helps, kind of,
4 highlight the real resilience and commitment of the NOP
5 team. You know, we have lost folks over the past year. Our
6 staff that is here is -- many, many of them have been here
7 for a good while now. A lot of them joined actually in a
8 hiring surge that started during the pandemic in 2020. And
9 so for a lot of them, they're kind of at the top of their
10 learning curve, which I -- it has just been delightful to
11 see them really come into that full knowledge and power in
12 doing their work. And so the staff has done a tremendous
13 job of recognizing, okay, we lost staff in this area, here's
14 some things that we can do differently.

15 You know, we also continue to evolve given a lot
16 of different sources of change. You know, we did SOE, and
17 it changed a whole lot of roles. You know, I mentioned how,
18 investigations, we can pull the thread now on import-
19 exporter relationships a lot faster now. So I would say the
20 departures we've had have accelerated our changed
21 management, which was a natural evolution from Strengthening
22 Organic Enforcement.

23 The Compliance and Enforcement team has done a
24 tremendous job of relooking at their processes to get
25 complaints done in different ways and faster. So, as an

1 example, it used to be if we got, sort of, a credible
2 complaint, we would fully investigate every element of it
3 and then send, kind of, a complete letter saying, here are
4 all the things we have found that you're out of compliance.
5 Now it's shorter. So we identify, okay, you're breaking
6 these rules. Tell us how your system is compliant. So we
7 get information out to the person being complained about
8 faster and get responses faster. And that's leading to
9 compliance faster, too. And so all of that is -- were good,
10 systematic, risk-based changes.

11 We have done some reassignments. So, for example,
12 we did lose the person who had been leading our appeals
13 function. So we did -- a staff member agreed to move over
14 to appeals. She had been working on a number of other
15 things, including TOPP. And so we have reallocated. She's
16 doing a fabulous job with appeals. We've had a number of
17 folks who have taken on new roles.

18 There are some things that we're not able to do
19 right now. So, for example, if you monitor the Organic
20 Insider, you haven't seen announcements of new courses in
21 the Organic Integrity Learning Center since about May.
22 That's -- we lost both our folks who work on the Organic
23 Integrity Learning Center. So there are still some gaps,
24 but I'm really, really proud of how the team has filled
25 those gaps.

1 We have, sort of, identified inputs into a broader
2 USDA hiring plan, but there are still executive orders that
3 are driving hiring at this point in time. So I'm very proud
4 of the team on everything that they have done to continue
5 the Program's momentum and their resilience and commitment
6 over the year.

7 NOSB CHAIR BRUCH: Thank you, Nate, for the
8 question. Thank you, Dr. Tucker.

9 Let's take a few more minutes here. We've got
10 four hands up. We'll go quick. This is such an important
11 exchange. Thank you so much. We'll go to Amanda next, and
12 then Franklin.

13 BD. MEM. FELDER: Yes, so NOP leadership has
14 previously discussed the need to reimagine certification in
15 the past. Can you share where that effort currently stands?
16 How it connects to risk-based certification, residue
17 testing, and the complex global supply chain that we're
18 facing?

19 DR. TUCKER: Yeah. I think a lot, you know, of
20 what I have been talking about today is some of that
21 reimagining. So that common OSP, the risk-based approaches
22 to both audits and working with certifiers to, kind of,
23 reimagine how they're applying critical thinking when they
24 go out. You know, I now -- you know, we'll often say I
25 would rather have an inspector do a four-hour inspection and

1 catch fraud than a 14-hour inspection and not catch it,
2 right? So it's really about where are you making the
3 maximum impact with your time to protect the folks who are
4 following the rules. So I would say the common OSP is an
5 effort that we're, kind of, all in on.

6 Would also -- I do think it is time to re-
7 envision -- so I think when we're talking about re-
8 envisioning certification, it's -- I don't have, like, this
9 big formal action item list right now. I think it is part
10 of a conversation with some key projects that we can start
11 with learning. I do think it is likely time to rethink the
12 idea of a scale-neutral or size-neutral. You know, there
13 are so many small farms that have adopted organic practices
14 that aren't certified because they don't feel like they need
15 to in their local markets, but they are -- they're
16 practicing organic.

17 Usually when I do site visits, people take me to,
18 you know, certified organic farms to visit all the things
19 they're doing. A couple of years ago, I went for a site
20 visit and the only farms they took me to were uncertified
21 farms that were trying to do the right thing, and they
22 weren't certified. And so even people had tried to convince
23 them, gosh, all you have to do is a couple of records here
24 and you could get certified because you're doing all the
25 right things.

1 A wonderful story. A woman looks out the window
2 and says, I don't need recordkeeping to tell me I got 19
3 rows of blueberry bushes. I can look out the window and
4 say, I have 19 rows of blueberry bushes, and my customers
5 can come here and see I have 19 rows of blueberry bushes.
6 And so is there a way of inviting those farms into this
7 system? I don't know what that is, but I think that would
8 be, sort of, a way of capturing good work happening in
9 organic that isn't on our radar right now. I think we could
10 all play a role in reimagining that. As well as reimagining
11 the sector's responsibility in overseeing, at the other side
12 of the scale, these long, complex systems, because that
13 would be reimagining certification as well, is shifting
14 accountability to the places where it can most live for a
15 responsible sector.

16 NOSB CHAIR BRUCH: Excellent. Thank you for that
17 question, Amanda. Thank you, Dr. Tucker.

18 We'll go to Franklin, Allison, and then I'll wrap
19 it up here with a question. Thank you.

20 BD. MEM. QUARCOO: Okay, Dr. Tucker, first of all,
21 I don't know how you are able to monitor the chat whilst in
22 the middle of a presentation, but that's not my question.
23 But could you provide insight on how the Program chooses to
24 leverage Advance Notice of Rulemaking and if there is an
25 ideal time for sequencing Advance Notice of Proposed

1 Rulemaking with certain Board Work Agenda recommendations?

2 DR. TUCKER: Yeah, that's a great question. We
3 haven't used -- they're called ANPRs, Advance Notice of
4 Proposed Rulemaking. It happens before a proposed rule. So
5 talking about the National List Proposed Rule, we did not do
6 an ANPR for that. We had Board recommendations, fairly kind
7 of straightforward issues, known issues, well-articulated,
8 able to move to a proposed rule. Most of the time, that's
9 the case.

10 The time we've used an ANPR was for inerts. You
11 know, there had been so much work over inerts over the years
12 with the community, all these different options, different
13 opinions at different times, just a whole universe of public
14 comment. So I think the ANPR on inerts worked really,
15 really well. Really complex, multiple options, not quite
16 sure what the right answer is, but the ANPR, kind of, took
17 all that body of work and laid it out. We didn't have quite
18 enough information to actually propose something yet, but we
19 had an awful lot of good options. And so laying out what
20 the options were with pros and cons and very specific
21 questions, I think ultimately showed through the ANPR
22 process with inerts that actually we had a lot of answers.
23 That there was a lot of agreement on a lot of things. And
24 here's the, kind of, body of work that still needs to be
25 worked on to get us to the point where we can do a proposed

1 rule.

2 And so I think the ANPR was a real good transition
3 point. It took us from the Board process into the
4 Administrative Procedure Act process, the APA process, which
5 governs rulemaking, kind of, here's the state of the -- of
6 play right now, now what do we do moving forward? And I
7 think it made it so we could get to a proposed -- better
8 proposed rule actually faster.

9 Looking back, there are other times where I wish
10 we had done an ANPR. It just wasn't a tool we, kind of,
11 really understood the power of, but we've gotten better as a
12 program at recognizing those opportunities. So there could
13 be opportunities where a lot of work has happened on an
14 issue, a lot of complex opinions and different views on how
15 things are going. There are times where, like, you're
16 working on seed right now, where there are also task forces
17 out in industry also working on seed, feeding --
18 everything's feeding in through different processes, where
19 if we don't know exactly what we would want to propose and
20 want to give a formal process for, kind of, just getting
21 ourselves organized as a sector in terms of what the
22 different options are and pros and cons, ANPRs can be an
23 interesting tool.

24 There are other interesting regulatory tools out
25 there, like Requests For Information, we haven't used in the

1 past. You know, often my goal is get it done, because the
2 longer things stay open, the less likely they're going to
3 get over the finish line. But I do think an ANPR can be a
4 good milestone test of where are we policy-wise.

5 NOSB CHAIR BRUCH: Thank you, Franklin, for the
6 question. We saw that in public comments. I'm really glad
7 you brought that up. Thank you, Dr. Tucker, for that
8 answer.

9 We'll go to Allison next.

10 NOSB VICE CHAIR JOHNSON: Thank you, Dr. Tucker.
11 You may have already answered my question, but first, I just
12 want to say it's so nice to have you back. Your leadership
13 and expertise is such a core part of this community, and I'm
14 glad you're here.

15 As you know, we've been exploring ways to increase
16 the use of organic seed and ensure the commercial
17 availability requirement is being enforced vigorously. And
18 our Fall 2024 Discussion Document on seed asked whether
19 there was still support for the NOSB's 2018 and 2019
20 recommendations on seed. We heard public comments at that
21 meeting that unanimously supported still moving ahead with
22 the 2018 recommendation, a little bit more mixed on the
23 2019. So I wanted to see if there are any plans to take
24 action on these prior recommendations? Or, if not, whether
25 you have any thoughts on what the NOSB could do to get

1 things moving again?

2 DR. TUCKER: Yeah. My understanding is the Board
3 does still have an open Agenda Item on seed, and so my
4 general philosophy is I only want to work on things once.
5 And so I think our current move would be to wait for the
6 Board to do old school here, pencils down, you're done, and
7 you're not going to work on that topic for a while. That's
8 when we would begin, sort of, a policy process, which
9 involves, you know, talking to the administration about this
10 as a, you know, why we believe it is a priority, what it
11 would look like, what is the policy tool involved. But in
12 general, when the Board is working on something, we will
13 stand by until the Board is done working on it. And so what
14 the Board can do is finish -- finish your work and then hand
15 it to us. And we will then take that, again, body of
16 knowledge around seed and talk with the administration about
17 potential next steps.

18 NOSB CHAIR BRUCH: Thank you. I want to thank
19 you, Allison.

20 Dr. Tucker, last question here. Thank you so much
21 for your extended time. You mentioned some comments about
22 the complex supply chains that we are experiencing for some
23 of our organic goods, both in produce and also grains. The
24 community has also observed that some countries seem to
25 function primarily as consolidation, aggregation, or change

1 shipment points, potentially with even low levels of product
2 modification there, but that makes true origin -- country of
3 origin really difficult through documentation to verify.
4 And you highlighted about import certificates just being
5 country of departure. There's also a challenge now with
6 rising shipping costs, tariffs, and multi-leg routes, that,
7 you know, the true cost of these organic goods are really
8 hard to identify.

9 How do you think that NOP views this structural
10 challenge about country of origin and the ability to gain
11 greater transparency and confidence in our organic supply
12 chain?

13 DR. TUCKER: Yeah, thanks for the question. I
14 think I've been talking about a lot of those complexities in
15 the conversation here. I think you've captured well, kind
16 of, what the challenge is.

17 You know, we did, when we were writing
18 Strengthening Organic Enforcement, when we weren't
19 conceiving that rule, we did talk about building full
20 supply-chain traceability into the regulations, and we ended
21 up not being able to do it because it just would have been
22 prohibitively expensive. That the amount of cost -- you
23 have to do a cost-benefit analysis for every single rule,
24 and at the time it was determined that that -- because the
25 other thing is, you can't require, sort of, step-by-step

1 traceability in an international market without also
2 requiring that your domestic market. It has to be fair.
3 You can't put more requirements on other countries than you
4 have on your own. And so that would have required
5 transaction certificates for everything in the United
6 States. Again, kind of, prohibitively expensive.

7 And so, again, I'm going to go back to what I
8 said. If you're an importer, if you're a buyer, ask about
9 the supply chains. You know, ask, "Where is this actually
10 coming from?" I do think the buyer side has power here. If
11 the interest is in high-integrity product, the buyer has
12 power in making that happen. And the more high-risk and
13 more complex supply chains are, the more risk of fraud you
14 are -- you're incurring.

15 NOSB CHAIR BRUCH: Thank you. Excellent.

16 All right, well, really appreciate your time here
17 today, Dr. Tucker, and your information about the updates
18 from the National Organic Program.

19 We're going to transition into our next segment,
20 which is actually a break, so why don't we return back at 10
21 after the hour? And we'll dive into our Board meeting then.
22 Thank you so much.

23 (Whereupon, a brief recess was taken.)

24 NOSB CHAIR BRUCH: All right, everybody, welcome
25 back. We're 10 past the hour. We are going to begin again.

1 And there's some information slides. We're going
2 to tackle in an additional administrative exchange here, and
3 then we'll get into the Crops Subcommittee items of
4 business. So first we'll discuss briefly conflict of
5 interest, our voting procedures, and a couple more updates
6 here.

7 So in terms of conflict of interest, Board members
8 were asked to disclose conflicts of interest, and none were
9 identified. We do have a process located in our PPM, and
10 there's additional information that you can view on the
11 slide in front of you.

12 And we will move on to the next slide on our
13 voting procedures. And there also is information in our PPM
14 that guides us in regards to votes. And what we are working
15 on is a vote -- voting follows the Policies and Procedures
16 Manual and requires a supermajority of votes cast. So in
17 the cases of our proposals and also Sunset materials, that's
18 a two-thirds vote. And just as a reminder, a yes vote
19 results in a change to the National List, essentially. So
20 we will be asked if we are wanting to remove a substance, so
21 a yes vote results in a change in the National List, and a
22 no vote maintains the List as is. So we will get into
23 additional reminders throughout the course of the
24 subcommittee deliberations.

25 And then just one additional note on our Sunset

1 summaries. Board members, please keep your substance
2 introductions brief so we can focus on stakeholder comments,
3 deliberation, Q&A, and voting. And Board members, as well
4 as the public, have access to all of the materials. They're
5 located online.

6 If there's not any questions -- or Allison, is
7 there any additional exchange that we need to have in this
8 segment?

9 VICE CHAIR JOHNSON: (Nods negative.)

10 NOSB CHAIR BRUCH: Okay. Excellent. Without
11 further ado, I'm going to hand over the mic to our Vice
12 Chair, Nate Lewis, for Crops. Thank you.

13 SECRETARY LEWIS: Yeah. Thanks, Amy. Vice Chair
14 of Crops; I will just make sure we're noted on that.

15 I am pinch-hitting for Logan, who just had a baby,
16 and the task of managing Crops and taking over her Sunsets,
17 all while also counting votes, is nothing compared to
18 motherhood. So I wish her the very best in raising those
19 wonderful young ones. So I'll be chairing Crops for the
20 next, I don't know, what do we have, Michelle, like about 90
21 minutes for this, or something in that -- along those -- two
22 hours? And I wanted to just give folks an overview of what
23 we're going to be working on.

24 We had -- we Amade an amendment to the agenda
25 proposed for the fall meeting. Due to the truncated nature

1 of this particular meeting, the reschedule, and public
2 comments we received related to the annotation on the
3 proposed pear ester agenda item, we decided as a
4 subcommittee to not work on -- or not bring forward that
5 proposal this meeting, but we will instead work on it a
6 little bit more in subcommittee and bring forward the pear
7 ester petition proposal for consideration in the spring.

8 Just to be specific, there were concerns raised by
9 the stakeholder community that the annotation was too
10 restrictive in terms of how pear ester is used. It is used
11 as a lure in traps and monitoring equipment, but it's also
12 used as a lure in pheromones, which are an active -- well,
13 you know, "active," but a passive/active mating disruption
14 used in orchards. And because of these public comments, we
15 decided to essentially bring it back to subcommittee before
16 we even brought it forward in the meeting. So it's not on
17 the agenda. It will be in the spring. We have not
18 forgotten about it. We understand it's a really important
19 material. And we also understand that, pending NOSB review,
20 tree fruit growers have a provisional ability to continue
21 using this substance. So we're hopeful that this additional
22 delay does not cause any unnecessary disruptions in the
23 industry.

24 So, that being said, we're going to jump into our
25 first topic, which I'll be the lead presenter on, and this

1 is synthetic compostable polymers. And this discussion and
2 proposal is -- what our goal is here, is to wrap up our
3 multi-year project related to compost and hand it back to
4 the Program so that they can complete their consideration of
5 the petition for rulemaking submitted related to compostable
6 polymers.

7 So with that, I'll jump in. I put together a few
8 slides that, kind of, outline the work we've done, this
9 proposal in particular, and then I want to make sure there's
10 plenty of time for the Board to discuss before we move into
11 voting.

12 So just a quick compost work timeline for NOSB.
13 Why are we talking about compost? Because it's always a
14 good time to talk about compost. But we do need to wrap up
15 our conversation around this topic in particular. So just a
16 little background. October 2023, the Program requested the
17 Board evaluate the BPI petition for rulemaking. At the
18 spring 2024 meeting, we convened a compost expert panel and
19 heard from the industry and scientific experts related to
20 compost and the issues that surround that process. At the
21 fall meeting in 2024, we made a recommendation on
22 definitions and practice standards and updates that we
23 believe the Program should take in that part of the rule.
24 Last spring, we passed a final recommendation affirming our
25 opinion that compost feedstocks -- that synthetic compost

1 feedstocks must be added to the National List by a two-
2 thirds NOSB recommendation and a Notice and Comment
3 Rulemaking by NOP. And then, as an attempt to tie a bow
4 around the overall topic of synthetic compostable polymers,
5 we put forward a recommendation for the fall meeting, which
6 we are now in -- it's a little bit -- this is a little bit
7 of dissonance for me, the fall meeting taking place in the
8 winter of 2026, our final recommendation on synthetic
9 compostable polymers. That is the material that we're
10 reviewing today, and I'll jump into that right now.

11 Next slide, please. So, in terms of our review of
12 synthetic compostable polymers, we asked for a limited-scope
13 technical review for synthetic compostable materials meeting
14 three ASTM standards. Those are 640021, 6868-21, and 8410-
15 21. We evaluated this large group of substances against the
16 National List criteria, and I should note that we asked for
17 the evaluation of these substances because these were the --
18 this was the broad class of substances that BPI originally
19 requested be included in their petition for rulemaking to
20 the Program. And so I know the Program is going to -- you
21 know, after we conclude our deliberations, the program is
22 going to provide some clarifications around the various
23 processes here. But I want to be just really clear that
24 there is a petition for rulemaking that BPI submitted a few
25 years ago, and that is distinct from a petition to the

1 National List. So the National Organic Standards Board has
2 a different opinion about what the correct process is. And
3 it might be a case of, you know, if your only tool is a
4 hammer, all problems look like a nail. But in this case, we
5 are looking at the substances that meet these ASTM standards
6 as the nail that we're using our National List criteria
7 against.

8 So, like I said, we evaluated this large group of
9 substances against National List criteria. There -- this
10 is -- shouldn't be a shocker, so no spoilers here, but we
11 determined that as a broad class and without use
12 restrictions, these substances fail one, two, or all of the
13 criteria and should not be added to the National List. That
14 being said, we are open to evaluating individual substances,
15 as some demonstrated the potential to meet National List
16 criteria. And I'll add to that, that we are open to
17 evaluating broader classes of substances with more
18 restricted use patterns, meaning perhaps only for fruit
19 stickers or only for collection bags, but as a broad class
20 of substances that could take many and all forms and be used
21 in many, and all different ways, we felt that it had -- that
22 it -- they did not meet all three criteria.

23 Now again, remember, in order to be on the
24 National List, you must meet all the criteria. You can't
25 just excel in one or two and still make it above the grade.

1 You need to meet all three criteria to make it on the
2 National List.

3 We also spent a little time talking about an
4 ongoing concern, and one that's reflected in the public
5 comments for this meeting, partly due to this proposal but
6 also partly due to the Sunset review of paper pots, which is
7 one of the substances we'll get into in the Sunset portion
8 of the subcommittee work, that our listings of -- for paper
9 as a synthetic compost feedstock on the National List don't
10 adequately address the contamination concerns that these
11 feedstocks currently pose. So some sort of a parking lot,
12 bike-rack topic here that we really should, at future boards
13 and perhaps at the next Sunset, start looking into updating
14 the annotation so that paper is better addressed in the
15 National List.

16 Next slide, please. So let's jump into the
17 National List criteria. It's a three-legged stool. We've
18 got environmental and human health; we've got compatibility
19 with the system of sustainable agriculture; and we've got
20 necessity.

21 So on the first one, environmental and human
22 health. As mentioned earlier, there's a spectrum of
23 substances that meet these various ASTM standards that are
24 related to compostability, and the toxicity safeguards
25 afforded by these ASTM standards may not fully align with

1 the safety expectations outlined in OFPA. So more
2 information is needed for specific substances. And we also
3 need -- I'll say that we also, as a board, review individual
4 substances; we also review them within the context in which
5 they're used. And so there were studies that were quite
6 alarming that were included in the technical report that
7 indicated that composts where post-consumer food waste is a
8 feedstock are higher in contaminants, and in particular
9 PFAS. So I want to be really clear here that it's unclear.
10 You know, it's not conclusive that it's the compostable
11 substances themselves that are the source of the PFAS
12 contamination, or the contamination at all, but it does seem
13 that -- there does seem to be a correlation between
14 acceptance of post-consumer food waste and all of the other
15 stuff that goes along with that for -- and that is a waste
16 stream that compostable polymers facilitate. There's a
17 correlation between that type of compost and compost that is
18 more contaminated with things that we don't want. And so it
19 is that context within which we need to evaluate these
20 substances.

21 And again, I think that underscores our, as a
22 subcommittee's, openness to evaluating these substances
23 again, on a substance-by-substance basis, because there is a
24 whole spectrum of types of substances that meet these
25 standards, or as within a use-pattern context. So if it's

1 limited to a certain use pattern, perhaps some of these
2 other contamination concerns can be eliminated. But again,
3 that wasn't within the scope of the work of the subcommittee
4 at this juncture.

5 Next slide, please. Compatibility with
6 sustainable agriculture. Now this is a little bit more
7 amorphous and subjective, I'd say, but still relevant and
8 important to the evaluation of a substance to National List
9 criteria. I think overall we, as a -- you know, I won't
10 speak for everyone, but generally feel like composting and
11 diversion of food waste from the waste stream is a
12 compatible goal -- is a goal that's compatible with
13 sustainable agriculture, so that anything that supports that
14 can be considered sustainable, can be considered compatible
15 with sustainable agriculture. And certain uses of
16 compostable polymers may align with these goals.

17 We want to acknowledge that the ASTM standards
18 provide a framework to ensure that the polymers that are
19 accepted do actually become food for microbes. These are
20 not, sort of, greenwashed substances. These are meaningful
21 standards that do -- in order to meet these standards, the
22 substances must actually become food for microbes. They
23 don't simply become smaller plastics that you cannot see
24 anymore and that -- and, sort of, you know, if I can't see
25 it, it's not a problem. This is -- these are actually

1 digested by microbes and turned into microbodies, carbon
2 dioxide, water, all the -- you know, all the byproducts of
3 biological process. So we want to acknowledge that these
4 ASTM standards are a good starting place for that particular
5 concern.

6 That being said, there are some real-world
7 practical issues. Compostable polymers are
8 indistinguishable from conventional plastics. And what we
9 hear from composters is, by and large, all plastic-appearing
10 items are removed, or they are attempted to be removed, from
11 the feedstocks going into the system. So the -- it's
12 unclear the extent to which these substances actually do
13 become composted at facilities. I'm sure there are some
14 facilities, and we heard from some in spring comments, that
15 don't do that prescreening process. But by and large, the
16 vast majority of composters screen out anything that appears
17 to look like plastic, compostable or otherwise.

18 Also, consumer behavior as it relates to
19 contamination of food waste with non-compostable plastics is
20 part of this issue. Consumers have a challenge in
21 determining what is compostable and what is not, and as a
22 result, a lot of things that shouldn't go into the compost
23 bin end up in the compost bin, and that is a significant
24 part of the contamination issues that composters are
25 experiencing on the incoming waste stream. And it's because

1 of these, sort of, contamination concerns based on current
2 behavior and current collection strategies, and the concerns
3 related to finished compost contamination that may occur
4 from compost made from these types of -- that include these
5 post-consumer food waste, that these substances are not
6 compatible with sustainable agriculture.

7 Next slide, please. So now we move into
8 necessity. When we look at necessity, we need to think
9 about it from all sides of the equation. So one of the
10 things we looked at is, you know, is there a shortage of
11 organic-compliant compost? It does not appear that in most
12 regions there is a shortage of organic-compliant compost.
13 That, you know, I was really compelled by. We heard from a
14 composter in Bozeman, Montana, which is geographically
15 isolated from a lot of other composting areas, and they
16 choose to accept compostable substances and therefore have a
17 non-compliant -- non-organic-compliant compost. And I
18 really have a lot of empathy for the producers out there who
19 choose to use compost as part of their fertility regime
20 because they really do not have an organic-compliant option
21 available. That being said, from what I can tell and what
22 the comments reveal, that is the exception, not the rule,
23 and that in general there is compost -- organic-compliant
24 compost available in most locations.

25 I'll repeat what I brought up last time, is that

1 composters are currently screening compostable polymers out
2 of their incoming feedstocks. So composters certainly do
3 not feel like compostable materials are necessary if they're
4 removing them from their compost piles. Now, I realize
5 that's perhaps not the most direct conclusion to draw
6 because they're removing them in order to remove the
7 plastics that are -- the non-compostable plastics that are
8 also intermingled. But because they're producing successful
9 compost without these compostable substances, it does not
10 seem to be necessary for that compost. We are not hearing
11 them asking for more compostable polymers. We are hearing
12 them ask for less contamination in the food waste they
13 accept. So that seems to be the necessity; is less
14 contamination in post-consumer food waste.

15 We hear, resoundingly from farmers, that they do
16 not want to apply contaminated compost. And there's already
17 concerns about the quality of compost that is organic-
18 compliant. And the inevitable contamination from plastics
19 and a whole host of persistent chemicals in that organic
20 compost, adding another one to the mix does not seem to
21 match what farmers are indicating is necessary in their
22 lives right now.

23 And then in somewhat of an artificial deadline
24 that had been imposed upon us by the great state of
25 California, and their labeling requirements around

1 compostable substances, and that labeling requirement, the
2 Cliff Notes of which are that in order to be labeled as
3 compostable, it must also be allowed in organic compost.
4 That requirement has -- the implementation of that
5 requirement has been delayed for a couple of years. I don't
6 quite remember when that now is. I believe it was supposed
7 to be implemented January 2026, so like right now, and I --
8 they may have gotten a one-year or two-year extension. And
9 I'll lean on my colleague Amanda from California to fill in
10 that blank when we get to our discussion point. But in any
11 event, the urgency imposed on us from the state of
12 California is not there, and so that element of necessity I
13 do not feel is relevant to the conversation.

14 Next slide, please. So just a brief summary of
15 the public comments we received on this topic. People
16 really care about compost. I think that's my biggest
17 takeaway, and that gives me hope for the future because
18 compost might not save the world itself, but you can't save
19 the world without compost. And it's really exciting for me
20 to hear and see all this excitement about compost and
21 keeping it as pure as we can, keeping it a meaningful and
22 important part of an organic farmer's fertility scheme, and,
23 you know, trying to use compost as part of the waste
24 reduction goals that we all are necessary for climate
25 change, carbon reduction goals, et cetera, et cetera.

1 And with that, we -- you know, a generalization of
2 the comments was overwhelming support for the subcommittee's
3 recommendation not to add the broad class of compostable
4 polymers to the National List. So folks tended to agree
5 with us that National List criteria were not satisfied by
6 the information we had before us about these substances.
7 And not just "don't add it to the National List," but
8 actually overwhelming support for continuing the prohibition
9 of compostable polymers in organic compost. So it wasn't
10 like "Don't add it to the National List. We want the
11 Program to move forward with BPI's petition for rulemaking
12 and change the definition of compost feedstocks to allow for
13 these substances." It was "Don't add it to the National
14 List and keep them prohibited. Do not change the rules to
15 allow these substances."

16 I'll acknowledge that there were really good
17 comments related to the substance of the proposal, related
18 to, you know, why are we even voting on the substance if it
19 was not petitioned directly for inclusion on the National
20 List? A great question I'll try to address in a bit. And
21 some good suggestions for, if we were to be recommending
22 addition to the National List, how to better describe the
23 definition for these types of substances or use a different
24 term. So those were -- those were interesting and
25 compelling, in my view.

1 There were concerns expressed about the technical
2 report and its completeness. I will remind folks that this
3 was a limited technical report that answered very specific
4 questions that the Board had. We did not -- we were not
5 following the typical petition process. We did not receive
6 a petition to add these substances to the National List. We
7 were applying our National List process to these substances
8 because it was our opinion that, in order to be included in
9 a -- in order to include a synthetic substance on the
10 National List, it must be -- sorry. In order to include a
11 synthetic substance in organic compost, it must be on the
12 National List.

13 There were concerns raised that we did not need to
14 evaluate these because they're fundamentally transformed
15 through the composting process. And again, that, I think,
16 highlights simply the difference in the opinion from the
17 petitioner for rulemaking, BPI, and the Board. BPI does not
18 believe these substances need to be on the National List,
19 and that was the underpinning for their petition for
20 rulemaking. The Board disagrees with that and believes
21 that, as we have for paper in compost, all synthetic
22 feedstocks must be added to the National List and meet
23 National List criteria. There were concerns raised that
24 we're evaluating synthetic compostable polymers more
25 strictly than paper. I would acknowledge that paper needs

1 work and would really like to see the Board work on paper as
2 a compost feedstock at its next Sunset review.

3 And we also came full circle back around to --
4 there was -- it was pointed out that we did not spend much
5 time looking at all the information that -- biodegradable
6 biobased mulch films in our evaluation of synthetic
7 compostable polymers, and I think that is also a valid
8 critique of the process. So I think that looking at more
9 information is absolutely within the realm of what we should
10 be doing, and would be happy to do that within the context
11 of a petition for addition of these substances to the
12 National List.

13 I'll note that biodegradable biobased mulch films
14 is up for Sunset review in the next couple of years. I
15 think we'll be looking -- we'll be determining whether it
16 needs an updated TR this year, and we will be evaluating
17 it -- it's Sunset review will be 2027, so good time to get
18 this in front of the Board to be thinking about that.

19 Okay, next slide, please. Okay, so just to
20 reiterate, here are some conclusions. The Board believes
21 that the NOP Practice Standards related to compost need a
22 refresh and an update. We passed that in the fall of 2024.
23 We believe that synthetic compost feedstocks should be
24 evaluated to National List criteria and only be allowed with
25 a two-thirds NOSB vote and NOP Notice and Comment

1 Rulemaking. We passed that proposal in the spring of 2025.
2 And based on the information available to the Board at this
3 time, we do not believe that synthetic compostable polymers
4 meeting these three ASTM standards should be added to the
5 National List because they fail one or two or all of the
6 National List criteria.

7 We welcome industry to petition for specific
8 substances to be included on the National List, as we
9 recognize compostable polymers do play a role in waste
10 reduction goals and may increase compost availability in
11 certain regions. I'll add to that, that we would be open to
12 broader-class -- petitions that address broader classes of
13 substances with limited use patterns. As I've already
14 mentioned, fruit stickers and plastic bags seem -- or, you
15 know, collection bags, seem to be the consensus spot that
16 we're finding, but again, however the industry wants to work
17 forward on that, we welcome that.

18 The current allowance for paper does not
19 adequately address contamination concerns that paper poses
20 in compost. We agree we need to do some more work on that,
21 and because of that, a revised annotation should be
22 considered by the Board at its next sunset review. And in
23 the vein of Sunset materials that we do have before us on
24 the horizon, we could also look at revising annotations on
25 biodegradable mulch films based on current science and

1 evaluation of these types of substances.

2 So I think with -- I think that's the end of my
3 thing. I'll just go one more slide and we'll be in our --
4 the actual proposal. I wanted to make a couple of notes on
5 this proposal.

6 So, to the public comment about "Why do a National
7 List recommendation at all?" I think that's a sound
8 critique of our process. And that being said, we wanted to
9 give the Program the most complete advice possible, and so
10 we gave them the advice that it's our belief and our opinion
11 that synthetic compostables should be on the National List.
12 And we felt that we -- if we just gave them that, and not
13 what our opinion was on whether or not they met the National
14 criteria -- National List criteria, it would be only, sort
15 of, a half opinion, or it would -- t hey would leave a gap
16 there. So what we're trying to do here is to bolster the
17 recommendation that these substances should be on the
18 National List if they're going to be allowed, with -- at --
19 based on current information that we have before us, with
20 what our opinion is about their compliance with the National
21 List criteria. So that is why we moved forward with a
22 recommendation, which clearly has -- did not pass the
23 subcommittee.

24 And then I'll also acknowledge a comment that I
25 thought provided a pretty good critique of the definition

1 motion, and they proposed a different term to be defined,
2 that "compostable materials" is a little too vague and
3 generic. I think that's a valid critique, as well, but I
4 don't think it necessarily is something we need to adopt
5 here. And just to be clear, when we use the term
6 "compostable materials," we mean all synthetic substances
7 that meet these three standards. And the definition was
8 designed this way to encapsulate the full picture of
9 substances that the original petitioner for rulemaking
10 was -- is proposing be included in the definition of compost
11 feedstock.

12 So it was strategic to include all these ASTM
13 standards in the definition. And I'll acknowledge, you
14 know, what -- it's a great example of the public comment
15 process. You get a lot of great minds looking at a topic,
16 and you're going to get better ideas than the group that was
17 at it first. So there are potentially better terms to use
18 besides "compostable materials." But for the purposes of
19 this proposal, the goal of using this "compostable
20 materials" with this definition was to evaluate the broad
21 category of substances that was being petitioned for
22 inclusion via rulemaking from BPI.

23 Okay, so with that, I will pause.

24 Amanda, I would like to give you first chance to
25 jump in on additional comments or, you know, viewpoints,

1 questions, et cetera, and then I'll open it up for the Board
2 for discussion. And then we'll move on to the vote.

3 BD. MEM. FELDER: Yeah, I'll keep it short. So to
4 answer the date, California kicked out the implementation of
5 their packaging requirement standard for classifying
6 compostables into June 2027. So it's an 18-month extension.

7 You know, I think we, as a subcommittee, really
8 focused on not just the technical review, but also, you
9 know, besides public comment, we did our own research and
10 reaching out to composters here in California. The good
11 base, obviously, since this is mostly driven from California
12 state requirements, you know, having those conversations of
13 what is our current issue? And I think this was driven
14 initially by the ask of, in California we're requiring
15 people to put your food waste into yard waste bins to be
16 composted at any compost facilities. So all of our trash
17 goes to -- they're required to do composting, and so this,
18 kind of, feeds into what that is.

19 So it opened a whole can of worms of
20 contamination. You know, Nate summarized it really well, of
21 what the concerns are, both from the public, and then also
22 from the composters of contamination and just feedstock and
23 what that actually means. So I think we did a really good
24 job. Nate, you did great of trying to broadly address this,
25 but also, very specifically, what is needed to really have a

1 clear picture of what we want to see in our feedstock as
2 growers for compost.

3 SECRETARY LEWIS: Thanks, Amanda.

4 Okay, with that, I'll welcome the Board to weigh
5 in with thoughts, questions, further deliberation.

6 Go ahead, Allison.

7 NOSB VICE CHAIR JOHNSON: Yes, staff. Thank you
8 so much, Nate, Amanda, Mindee from the past, for the thought
9 you put into this process and the steps that you've laid out
10 and followed. I think it's been easy to follow on a very
11 complex subject, and the rigor behind your analysis and the
12 steps makes it, I think, pretty easy to come to a decision
13 today.

14 I'm very concerned about food waste and how we can
15 have more closed-loop processes in place, and it seems clear
16 that we're not at the point that it would be appropriate to
17 add a group of compostable synthetics to the National List.
18 I really hope we get to a point where we have, you know,
19 some great fiber-based materials that are used more widely
20 in food service and in our homes that farmers feel
21 comfortable adding to their compost feedstocks. But it was
22 pretty clear from public comments that that's not the place
23 that the organic community is in. So I think the path that
24 the subcommittee has laid out is really strong and
25 defensible.

1 I have a friendly question/amendment on the
2 definition, and I wish I had caught this sooner, but just
3 looking back over it, I am a little bit worried about
4 defining "compostable materials" for any potential
5 precedential value down the line. So either in the motion,
6 if we could clarify that this is a definition for the
7 purposes of this proposal only, or if that language could be
8 incorporated even into the cover sheet, just to make sure
9 that it's clear to the community we're not proposing this as
10 a definition of "compostable materials" moving forward, it's
11 just to have clear words to vote on in this proposal.
12 That's my only flag for you.

13 SECRETARY LEWIS: Yeah, thanks, Allison. And, you
14 know, I think, ideally it would be -- the term would be
15 "compostable synthetic polymer materials" or something to
16 that effect. But I think wordsmithing it right now -- like,
17 what I -- you know, what I'm hoping we do is pass this, and
18 I think your comment and suggestion is well taken. I think
19 adding that texture to the cover sheet is really important
20 because, yes, there are a lot of compostable materials that
21 would not be even eligible for meeting these ASTM standards
22 because they're things like manure, offal, or what have you.
23 So, yeah, I think that -- I think point well taken, and I
24 think the cover sheet would be a great place to clarify
25 that.

1 Amy.

2 NOSB CHAIR BRUCH: Excellent. Yeah, Allison,
3 thank you for those points you are bringing up. Nate, I
4 think that's an acceptable path forward on that.

5 I just want to say thank you. I echo Allison's
6 comments. This has been a Work Agenda item, and it was
7 expansive because it was also, it was a petition, as you
8 mentioned, Nate, and then additional Work Agenda requests
9 from the Crops Subcommittee, and it does span several board
10 members' terms. And thank you for carrying on leadership
11 with us, Nate, and using the process-driven approach.
12 Amanda, really appreciate you coming into this equation.
13 And again, I want to highlight the passion and the technical
14 acumen that Mindee Jeffries brought to this Work Agenda
15 topic, as well. It's really comprehensive. But I think you
16 laid it out. I love, you know, just laying the OFPA
17 criteria out. I think that's important as we use that as
18 the compass to drive our forward progress here.

19 And just, probably as a side note, as a farmer on
20 a family land that extends over 100 years, you know, I -- I
21 really appreciate the framework that OFPA provides us to
22 make sure we make decisions that are intelligent. I think
23 that's really solid there. I echo some of the farmer
24 comments that we received in the public comment process and
25 just have similar concerns on contamination. So we just

1 definitely need to use OFPA criteria to guide our process.
2 And then the TR was a very pivotal document, as what was
3 mentioned, as well as public comments. I really appreciate
4 that. Thank you.

5 And just to highlight, this is going to be a
6 three-vote process as we go forward on this particular
7 substance. And you can see the upcoming subcommittee votes
8 accordingly.

9 SECRETARY LEWIS: Any other comments?
10 (No response.)

11 SECRETARY LEWIS: All right. Well, as I don't
12 think there's any, I'll -- and so first vote -- first set of
13 votes of the meeting, so, you know, bear with me; I'm trying
14 to do chairing Crops, and I'll be counting up to, I think,
15 what, 13 today?

16 But I'm going to turn it back over to you, Amy, to
17 lead those votes; is that how we're doing this?

18 NOSB CHAIR BRUCH: Yep. Fair enough.

19 SECRETARY LEWIS: Okay.

20 NOSB CHAIR BRUCH: I know. You are wearing
21 multiple hats all day long, and tomorrow, too.

22 SECRETARY LEWIS: Yes.

23 NOSB CHAIR BRUCH: But thank you, Nate. We'll
24 work through this together. Not seeing any additional
25 questions, we'll move on to the vote.

1 So the first one is in front of us, motion is to
2 define compostable materials as "Compostable materials:
3 materials meeting compostability specifications outlined in
4 front of you used for making compost."

5 And it was motioned by Nate Lewis, and seconded by
6 Amy Bruch. And we will start the voting with Brian.

7 BD. MEM. CALDWELL: Yes.

8 NOSB CHAIR BRUCH: All right. Kathryn.

9 BD. MEM. DESCHENES: Yes.

10 NOSB CHAIR BRUCH: Carolyn.

11 BD. MEM. DIMITRI: Yes.

12 NOSB CHAIR BRUCH: Amanda.

13 BD. MEM. FELDER: Yes.

14 NOSB CHAIR BRUCH: Andrea.

15 BD. MEM. HATZIYANNIS: Yes.

16 NOSB CHAIR BRUCH: Allison.

17 NOSB VICE CHAIR JOHNSON: Yes.

18 NOSB CHAIR BRUCH: Nate.

19 SECRETARY LEWIS: Yes.

20 NOSB CHAIR BRUCH: Cat.

21 BD. MEM. McCLUSKY: (No response.)

22 NOSB CHAIR BRUCH: I believe she's absent. Dilip.

23 BD. MEM. NANDWANI: Yes.

24 NOSB CHAIR BRUCH: Logan.

25 BD. MEM. PETREY LINKENHOGGER: Yes.

1 NOSB CHAIR BRUCH: Corie.

2 BD. MEM. PIERCE: Yes.

3 NOSB CHAIR BRUCH: Franklin.

4 BD. MEM. QUARCOO: Yes.

5 NOSB CHAIR BRUCH: Kyla.

6 BD. MEM. SMITH: Yes.

7 NOSB CHAIR BRUCH: Javier.

8 BD. MEM. ZAMORA: (No response.)

9 NOSB CHAIR BRUCH: Absent. And the Chair votes
10 yes.

11 SECRETARY LEWIS: So, we have -- I don't think
12 that added up quite right. We've got 13 yes and zero no,
13 zero abstentions, zero recusals, and two absent; the motion
14 carries.

15 NOSB CHAIR BRUCH: Thanks, Nate. Thanks, team.
16 We'll move on to the next vote here. The motion is to
17 "classify Compostable Materials as synthetic." That was
18 motioned by Nate Lewis, and seconded by Corie Pierce.

19 We will start with Kathryn.

20 BD. MEM. DESCHENES: Yes.

21 NOSB CHAIR BRUCH: Carolyn.

22 BD. MEM. DIMITRI: Yes.

23 NOSB CHAIR BRUCH: Amanda.

24 BD. MEM. FELDER: Yes.

25 NOSB CHAIR BRUCH: Andrea.

1 BD. MEM. HATZIYANNIS: Yes.
2 NOSB CHAIR BRUCH: Allison.
3 NOSB VICE CHAIR JOHNSON: Yes.
4 NOSB CHAIR BRUCH: Nate.
5 SECRETARY LEWIS: Yes.
6 NOSB CHAIR BRUCH: Cat.
7 BD. MEM. McCLUSKY: (No response.)
8 NOSB CHAIR BRUCH: Absent. Dilip.
9 BD. MEM. NANDWANI: Yes.
10 NOSB CHAIR BRUCH: Logan.
11 BD. MEM. PETREY LINKENHOGGER: Yes.
12 NOSB CHAIR BRUCH: Corie.
13 BD. MEM. PIERCE: Yes.
14 NOSB CHAIR BRUCH: Franklin.
15 BD. MEM. QUARCOO: Yes.
16 NOSB CHAIR BRUCH: Kyla.
17 BD. MEM. SMITH: Yes.
18 NOSB CHAIR BRUCH: Thank you. Javier.
19 BD. MEM. ZAMORA: (No response.)
20 NOSB CHAIR BRUCH: Absent. Brian.
21 BD. MEM. CALDWELL: Yes.
22 NOSB CHAIR BRUCH: And the Chair votes yes.
23 SECRETARY LEWIS: That's 13 yes, zero no, zero
24 abstentions, zero recusals, two absent; the motion carries.
25 NOSB CHAIR BRUCH: Thank you, Nate.

1 All right, moving on to the third motion here.
2 This is motion to add compostable materials at 205.601(c) as
3 compost feedstocks. Motioned by Nate Lewis, seconded by
4 Brian. We'll start with Carolyn.

5 BD. MEM. DIMITRI: No.

6 NOSB CHAIR BRUCH: Amanda.

7 BD. MEM. FELDER: No.

8 NOSB CHAIR BRUCH: Andrea.

9 BD. MEM. HATZIYANNIS: No.

10 NOSB CHAIR BRUCH: Allison.

11 NOSB VICE CHAIR JOHNSON: No.

12 NOSB CHAIR BRUCH: Nate.

13 SECRETARY LEWIS: No.

14 NOSB CHAIR BRUCH: Cat.

15 BD. MEM. McCLUSKY: (No response.)

16 NOSB CHAIR BRUCH: Absent. Dilip.

17 BD. MEM. NANDWANI: No.

18 NOSB CHAIR BRUCH: Logan.

19 BD. MEM. PETREY LINKENHOGGER: No.

20 NOSB CHAIR BRUCH: Corie.

21 BD. MEM. PIERCE: No.

22 NOSB CHAIR BRUCH: Franklin.

23 BD. MEM. QUARCOO: No.

24 NOSB CHAIR BRUCH: Kyla.

25 BD. MEM. SMITH: No.

1 NOSB CHAIR BRUCH: Javier.

2 BD. MEM. ZAMORA: (No response.)

3 NOSB CHAIR BRUCH: Absent. Brian.

4 BD. MEM. CALDWELL: No.

5 NOSB CHAIR BRUCH: Kathryn.

6 BD. MEM. DESCHENES: No.

7 NOSB CHAIR BRUCH: And the Chair votes no.

8 SECRETARY LEWIS: Zero yes, 13 no, zero
9 abstentions, zero recusals, two absent; the vote -- the
10 motion fails.

11 All right, I'm back. Thank you all so much for,
12 kind of, concluding our work on compost. It's been a long,
13 long slog. There have been moments of low bulk density and
14 perhaps not enough aeration, but we made it through. And
15 may alluded to it, but our -- my former colleague Mindee
16 Jeffrey, which I think I saw in the gallery is there;
17 couldn't have gotten this far without her work and her
18 leadership in the compost space on the Board. So shout out
19 to Mindee .

20 And with that, we will pivot to our Sunset
21 reviews. We have one-, two-, three-, nine-, 12 -- we have
22 15 substances to get through. And just as a reminder, we
23 are going to try to be swift, so let's give it a shot with
24 focused presentations, and hopefully we can move through
25 these pretty quickly.

1 The first one up is potassium hypochlorite with
2 Franklin. And I'll pass it to you, Franklin.

3 BD. MEM. QUARCOO: All right. Can you hear me?

4 BD. MEM. SMITH: Yes, we can.

5 BD. MEM. QUARCOO: All right, so potassium
6 hypochlorite, listed at 205.601, "As an algaecide,
7 disinfectant, and sanitizer, including irrigation system
8 cleaning."

9 An important point noted in the listing is that
10 residual chlorine levels in the water that is in direct
11 contact with crops or -- and water from cleaning the systems
12 that come in contact with soil must not exceed the maximum
13 residual disinfectant limit under the Safe Drinking Water
14 Act.

15 I'll say that there was an additional -- apart
16 from a 2011 TR, there was an additional TR that was made
17 available to us in 2025, specifically dealing with potassium
18 hypochlorite. Until then, we dealt with chlorine materials
19 and sodium hypochlorite, and other materials, and that was
20 the information that was used for potassium hypochlorite.

21 I'll -- in the interest of time, I'll focus on
22 some of the discussions and public comments. The Crop
23 Subcommittee was generally in favor of relisting potassium
24 hypochlorite, but there are comments that were both for and
25 against listing. So some of the comments were that, well,

1 we have sodium hypochlorite and other hypochlorites, there
2 is no need for this. And then there were other comments
3 that said, well, because of salinization that is associated
4 with sodium, potassium doesn't give that problem, and then
5 there's additional benefit that potassium serves as a
6 nutrient to the plant. Then there were other comments that
7 potassium itself is a synthetic material that is found on
8 the list, so there's no need to do that. And those other
9 hypochlorites are there, so there is no need for that.

10 There was one commenting organization that talked
11 about some of the negative health and environmental effects
12 of chlorine chemistry. And when you look at some of the
13 information that came to us, if these products are used
14 according to some of the specifications, some of the
15 problems that folks worry about may not be a problem.

16 There were also comments -- there were some
17 farming organizations that said this is -- having it on the
18 list is good, and they actually were in support of some of
19 the consideration the Board was having about introducing an
20 annotation that limited the source of chlorine for these
21 chlorine materials to come from material -- processes that
22 were environmentally more friendly and stuff like that. But
23 there were other comments that stated that such an
24 inclusion, you know, such an annotation will be
25 counterproductive to the organic industry; it will make

1 chlorine materials more difficult to get -- that chlorine
2 materials that meet that specification difficult to get, and
3 a range of other comments. So we have comments both for and
4 against chlorine materials.

5 But generally, the Subcommittee found potassium
6 hypochlorite to be compliant with the Organic Food
7 Production Act. And at the Subcommittee level, out of seven
8 people who voted, six voted against removing potassium
9 hypochlorite from the National List.

10 That's about all I want to say. In the interest
11 of time, that's the main things I wanted to highlight.
12 Thank you.

13 SECRETARY LEWIS: Thanks, Franklin.

14 Amy, do you want to lead us through the Sunset,
15 though -- or I guess we should, if there's any discussion on
16 the substance, we'll do that, and then I'll have Amy lead us
17 through the vote.

18 NOSB CHAIR BRUCH: Yes.

19 SECRETARY LEWIS: Any discussion?

20 NOSB CHAIR BRUCH: Any questions?

21 (No response.)

22 NOSB CHAIR BRUCH: Okay. Thank you, Franklin.
23 Well done there.

24 We will move into the vote then. There is a
25 motion to remove potassium hypochlorite from the National

1 List. It was motioned by Franklin, and seconded by Brian.
2 We will start the voting with Amanda. And just as a quick
3 reminder, I guess, though when we're moving into sunset
4 materials, a yes vote is to change the National List, a no
5 vote keeps a substance on the National List the same.

6 Amanda, please start us off.

7 BD. MEM. FELDER: No.

8 NOSB CHAIR BRUCH: Thank you. Andrea.

9 BD. MEM. HATZIYANNIS: No.

10 NOSB CHAIR BRUCH: Allison.

11 NOSB VICE CHAIR JOHNSON: No.

12 NOSB CHAIR BRUCH: Nate.

13 SECRETARY LEWIS: No.

14 NOSB CHAIR BRUCH: Cat.

15 BD. MEM. McCLUSKY: (No response.)

16 BD. MEM. CALDWELL: Absent. Dilip.

17 BD. MEM. NANDWANI: No.

18 NOSB CHAIR BRUCH: Logan.

19 BD. MEM. PETREY LINKENHOGGER: (No response.)

20 NOSB CHAIR BRUCH: Absent. Corie.

21 BD. MEM. PIERCE: No.

22 NOSB CHAIR BRUCH: Franklin.

23 BD. MEM. QUARCOO: No.

24 NOSB CHAIR BRUCH: Kyla.

25 BD. MEM. SMITH: No.

1 NOSB CHAIR BRUCH: Javier.

2 BD. MEM. ZAMORA: (No response.)

3 NOSB CHAIR BRUCH: Absent. Brian.

4 BD. MEM. CALDWELL: No.

5 NOSB CHAIR BRUCH: Kathryn.

6 BD. MEM. DESCHENES: No.

7 NOSB CHAIR BRUCH: Carolyn.

8 BD. MEM. DIMITRI: No.

9 NOSB CHAIR BRUCH: And the Chair votes no.

10 SECRETARY LEWIS: For this vote, we had zero yes,
11 12 no, zero abstentions, zero recusals, and three absent;
12 the motion fails.

13 Thank you all. We made it through our first
14 Sunset vote of the Fall 2025 meeting. Congratulations.

15 And with that, we will pause on Sunsets, because
16 I -- Dr. Tucker was away from her desk at the conclusion of
17 the compost conversation and vote, and I believe she wanted
18 to provide the community and the Board with some context
19 related to next steps and various rulemaking options for the
20 program. So hopefully Dr. Tucker's back and can provide
21 that.

22 DR. TUCKER: Hi, everybody. Thank you for
23 inviting me back. I just very quickly, kind of, scrolled
24 through the comments over on the chat, and I'm aware of the
25 vote here, so I know there are a lot of questions.

1 Nate, I just want to compliment you on, when you
2 opened this topic, you did a really nice job of framing it,
3 in terms of what brought us here, you know, all of that. So
4 thank you. This is an incredibly complicated topic with a
5 whole lot of history, and I thought you did a beautiful
6 executive summary of kind of where we are.

7 And so what is next here is we do have the
8 petition for rulemaking. We do have a -- an obligation at a
9 program level to consider that petition, and the Board's
10 process has been part of that. But there's also a separate
11 Board consideration -- sorry, a separate consideration by
12 USDA on that petition. We also now have, or will be getting
13 very soon, a Board recommendation on this topic. Now,
14 clearly, these are very opposite -- "different" --
15 "opposite" is probably not an accurate word, but very, very
16 different theories of the case on how compost should be
17 considered and handled policy-wise.

18 I do want to make it, sort of, clear for listeners
19 that we have these inputs now, but right now nothing changes
20 from a policy perspective. And so certifiers for reviews of
21 compost follow the same rules that you've been following for
22 a long, long, long time. So this should not, right now,
23 change anything in terms of practice. So what has to happen
24 to implement any of these either recommendations or petition
25 for rulemaking would require a rulemaking process, and that

1 rulemaking process would consider all of the different
2 dimensions of both petition for rulemaking and the Board's
3 recommendation.

4 So, as I noted, one of our priorities is
5 consulting with the Administration on their priorities and
6 desired directions in terms of how we would proceed here.
7 So that's the next step; is we take all of these inputs and
8 enter deliberative policy discussion within USDA. In the
9 meantime, practices and rules have not changed, and so no
10 one needs to change their practices, as long as they're
11 compliant with the current rules as published.

12 Did -- Nate, how was that? Do we need additional
13 clarification based on the questions that you're getting?

14 SECRETARY LEWIS: No. That's great. Yeah.

15 BD. DR. TUCKER: Okay.

16 SECRETARY LEWIS: No, I --

17 DR. TUCKER: Okay.

18 SECRETARY LEWIS: -- just acknowledge that we
19 wanted to get the Program to sort of put the capstone --

20 DR. TUCKER: Yeah.

21 SECRETARY LEWIS: -- on the topic, and I wanted to
22 make sure that you were just -- like, the timing didn't
23 quite work out.

24 DR. TUCKER: Yeah, sorry about that.

25 SECRETARY LEWIS: No. It's all good.

1 DR. TUCKER: I really thought I had scheduled this
2 other meeting at a time where -- as you would be in the
3 middle of Sunsets, and so, yeah, I guess that's what happens
4 when I go long with my NOP Update. So, sorry about that,
5 and thank you, everyone.

6 I'll go off camera again. Thank you.

7 SECRETARY LEWIS: Yeah, thank you, Jenny. And I
8 appreciate -- or Dr. Tucker. I appreciate the update on
9 that. That's really, really helpful.

10 Okay, so with that, we will pivot back to Sunsets,
11 unless anyone on the Board had any other additional comments
12 on that?

13 (No response.)

14 SECRETARY LEWIS: Which I'm not seeing anything
15 rise to the top.

16 Okay, so let's pivot back to Sunsets. And next up
17 is soap-based algicide/demossers, which I believe is your
18 substance, Amy.

19 NOSB CHAIR BRUCH: Yes, Nate. All right. Thank
20 you so much. And that was a good update by Dr. Tucker, very
21 helpful insight there.

22 All right, soap-based algaecide/demossers. The
23 use, they're a synthetic -- synthetic soap salts are
24 approved as algaecides and demossers, and also permitted to
25 control algae and mosses in and around production areas,

1 including walkways, greenhouse surfaces, and irrigation
2 systems.

3 So a few key points here. They're essential for
4 greenhouse sanitation. Growers rely on these materials to
5 control algae, mold, and biofilm. They're critical for
6 irrigation system functionality. They prevent emitter
7 plugging from algae and other items. Without them, water
8 uniformity and crop performance are compromised.

9 Food safety. It helps with supporting food safety
10 in FSMA compliance requirements by maintaining sanitary
11 irrigation systems.

12 And there's broad use. There's a lot of public
13 comments on the need for the substance. There was a couple
14 public commenters that mentioned that potentially an
15 annotation or clarification could occur with what base
16 material the soaps could be, potassium or ammonia, and then
17 around irrigation water sources. But overall, they're
18 essentially viewed as an essential sanitation tool aligned
19 with organic principles, food safety, and system
20 functionality.

21 Are there any questions?

22 (No response.)

23 NOSB CHAIR BRUCH: All right, I am not seeing any.

24 So there is a motion to remove soap-based
25 algaecides and demossers. It was motioned by Amy Bruch, and

1 seconded by Corie. Our voting will start with Andrea.
2 BD. MEM. HATZIYANNIS: No.
3 NOSB CHAIR BRUCH: Allison.
4 NOSB VICE CHAIR JOHNSON: No.
5 NOSB CHAIR BRUCH: Nate.
6 SECRETARY LEWIS: No.
7 NOSB CHAIR BRUCH: Cat.
8 BD. MEM. McCLUSKY: (No response.)
9 NOSB CHAIR BRUCH: Absent. Dilip.
10 BD. MEM. NANDWANI: No.
11 NOSB CHAIR BRUCH: Logan
12 BD. MEM. PETREY LINKENHOGGER: (No response.)
13 NOSB CHAIR BRUCH: Absent. Corie.
14 BD. MEM. PIERCE: No.
15 NOSB CHAIR BRUCH: Franklin.
16 BD. MEM. QUARCOO: No.
17 NOSB CHAIR BRUCH: Kyla.
18 BD. MEM. SMITH: No.
19 NOSB CHAIR BRUCH: Javier.
20 BD. MEM. ZAMORA: (No response.)
21 NOSB CHAIR BRUCH: Absent. Brian.
22 BD. MEM. CALDWELL: No.
23 DR. TUCKER: Kathryn.
24 BD. MEM. DESCHENES: No.
25 NOSB CHAIR BRUCH: Carolyn.

1 BD. MEM. DIMITRI: No.

2 NOSB CHAIR BRUCH: Amanda.

3 BD. MEM. FELDER: No.

4 NOSB CHAIR BRUCH: And the Chair votes no. Thank
5 you.

6 SECRETARY LEWIS: Zero yes, 12 no, zero
7 abstentions, zero recusals, three absent; the motion fails.

8 Thank you, Amy. I believe I am up next with
9 ammonium carbonate. Just to remind folks, I am pinch-
10 hitting for Logan on her sub -- on the substances that she
11 led this last cycle, so I am playing a little bit of catch-
12 up here, but I'm going to do my best.

13 So ammonium carbonate is listed at 605 -- sorry,
14 205.601(e) "As an insecticide, ammonium carbonate - for use
15 as bait in insect traps only, no direct contact with crop or
16 soil."

17 So it's used in small quantities as an attractant.
18 And it's sometimes used alone or in mixtures with yeast to
19 enhance its chemical attraction to insects. It is
20 manufactured by the reaction of ammonia with carbon dioxide,
21 and so it is very -- indeed a synthetic substance.

22 Let's see. Alternatives, because it's used as
23 a -- alternatives do exist, but because it's used as an
24 ingredient in a lot of pheromone and, sort of, insect-
25 attracting traps, its concentration is deemed necessary,

1 and -- the concentration of the synthetic product itself is
2 deemed necessary.

3 And we did ask a question about the effects of
4 traps and monitors on non-target insect species; did not get
5 too much feedback on that specific question, or at least in
6 terms of in a hypothetical sense. We did get responses that
7 that could happen, but in terms of research related to
8 dramatic impacts of lures and monitoring traps, and their
9 impact on non-target species, we did not get any more
10 additional information. Public comments generally were in
11 support of maintaining this ingredient on the -- or the
12 substance on the list, citing its use in mating disruptions,
13 which are a foundational IPM approach to pest management,
14 namely in specialty crops. The Subcommittee was unanimous
15 in its vote to keep ammonium carbonate on the list.

16 And I think with that, I'll field any questions,
17 and if there aren't any, return it to Amy to lead us through
18 the vote.

19 (No response.)

20 NOSB CHAIR BRUCH: Excellent. So I'm not seeing
21 any questions here.

22 There's a motion to remove ammonium from the
23 National List. The motion was by Logan, seconded by Brian.
24 We will start the voting here with Allison.

25 NOSB VICE CHAIR JOHNSON: No.

1 NOSB CHAIR BRUCH: Nate.
2 SECRETARY LEWIS: No.
3 NOSB CHAIR BRUCH: Cat.
4 BD. MEM. McCLUSKY: (No response.)
5 NOSB CHAIR BRUCH: Absent. Dilip.
6 BD. MEM. NANDWANI: No.
7 NOSB CHAIR BRUCH: Logan.
8 BD. MEM. PETREY LINKENHOGGER: (No response.)
9 NOSB CHAIR BRUCH: Absent. Corie.
10 BD. MEM. PIERCE: No.
11 NOSB CHAIR BRUCH: Franklin.
12 BD. MEM. QUARCOO: No.
13 NOSB CHAIR BRUCH: Kyla.
14 BD. MEM. SMITH: No.
15 NOSB CHAIR BRUCH: Javier.
16 BD. MEM. ZAMORA: (No response.)
17 NOSB CHAIR BRUCH: Absent. Brian.
18 BD. MEM. CALDWELL: No.
19 NOSB CHAIR BRUCH: Kathryn.
20 BD. MEM. DESCHENES: No.
21 NOSB CHAIR BRUCH: Carolyn.
22 BD. MEM. DIMITRI: No.
23 NOSB CHAIR BRUCH: Amanda.
24 BD. MEM. FELDER: Sorry, button issue there. No.
25 NOSB CHAIR BRUCH: No worries. Andrea.

1 BD. MEM. HATZIYANNIS: No.

2 NOSB CHAIR BRUCH: And the Chair votes no.

3 SECRETARY LEWIS: Zero yes, 12 no, zero
4 abstentions, zero recusals, three absent; the motion fails.

5 SECRETARY LEWIS: Okay.

6 NOSB CHAIR BRUCH: Okay, excellent. Nate, I'm
7 going to jump right in here. We are at our break.

8 SECRETARY LEWIS: Oh, okay.

9 NOSB CHAIR BRUCH: We're a little bit behind
10 schedule, but we're going to keep to our break timing, just
11 for those that were planning around this. We actually are
12 going to take a 20-minute break instead of 30, and we will
13 return back here at half past the hour and resume Crops.
14 Thank you so much.

15 (Whereupon, at 2:12 p.m., a luncheon recess was taken.)

16 NOSB CHAIR BRUCH: Welcome back, everybody.
17 We're excited about the second part of our day here.

18 I just want to make a couple announcements. One
19 is just a testament to this community and the strength of
20 it. At our peak, we had over 300 attendees that were
21 joining us, so that's incredible that -- that's:: just an
22 awesome testament to being able to still convene and have
23 and conduct business virtually. So I wanted to say thanks
24 to that.

25 Also, I had promised to circle back on some roll

1 call members, so I see a few more that I'd like to make sure
2 to circle back on. And in lieu of icebreakers, we're just
3 going to patch up Andrea, Carolyn, and Logan if they're on.
4 So, Andrea, I am seeing you, if you don't mind just
5 providing a brief bio and the seat that you serve, the year
6 that you're in. And I'm going to let you off easy; you
7 don't have an icebreaker question as a part of your
8 introduction. So I learned my lesson there on the front
9 end, but go ahead, Andrea.

10 BD. MEM. HATZIYANNIS: Thank you so much, Amy.

11 I'm Andrea Hatziyannis. I am sitting -- serving
12 in the Retailer seat on the Organic Standards Board. I have
13 just completed my first year, and I reside in Phoenix,
14 Arizona, currently working for -- as a Senior Category
15 Strategy Manager for Sprouts Farmers Market, one of the
16 leading natural organic grocers in the industry, and we're
17 super excited to participate on the Board in this capacity.

18 NOSB CHAIR BRUCH: Excellent. Thank you so much,
19 Andrea. And just like the rest of the members of your
20 class, you guys really are impressive and hit the ground
21 running, and I thank you for that. And I also thank you for
22 your passion for our program, for our label, and the board,
23 so really appreciate that.

24 We're going to go to Logan next.

25 BD. MEM. PETREY LINKENHOGGER: Hi, thank you.

1 Logan Linkenhoger. I'm in the Farmer's seat. I am a super
2 senior, so I'm on my last year. And I worked for Grimmway.
3 I was the farm manager for Grimmway -- organics farm manager
4 for a few years. I've been in organic farming for 10 years,
5 and I actually left Grimmway in July, and my husband and I
6 are starting a organic produce farm. We're in transition
7 right now, so very excited and going from a large acreage to
8 very small, so that's very exciting.

9 And I was encouraged by a lot of people in the
10 organic industry, and met so many people that do this, and
11 that was where our passion was led. And so I went on the
12 board, having no clue that I would take this path in a few
13 years, so again, very exciting.

14 And you can see that we have Micah Jo here as
15 well. She was born December 5th. And we thought that
16 she -- you know, would be at the Board meeting with me
17 before, but it's not under the circumstances, so here she is
18 with me. So thank you all for your patience and Board
19 members for helping me out during this time. Thank you.

20 NOSB CHAIR BRUCH: Thank you kindly, Logan. You
21 have redefined the definition of working hard. My goodness,
22 everything that you balance, really appreciate the voice
23 that you bring from the southeast. It's really important to
24 elevate the voice of the farmers and certificate holders in
25 that community, and I've thoroughly enjoyed being able to

1 talk farm and farm talk and agronomy with you. It's been
2 such a joy. Thank you so much.

3 All right, we are going to move to Dr. --

4 BD. MEM. SMITH: Amy?

5 NOSB CHAIR BRUCH: -- Dimitri. Yes?

6 BD. MEM. SMITH: Yeah, I thought you were going to
7 forget Carolyn. Sorry.

8 NOSB CHAIR BRUCH: Oh, no. Can't forget Carolyn.
9 No, not at all. I was just, kind of, scanning the crowd. I
10 can't get everybody's tiles on here.

11 Dr. Dimitri, are you -- oh, there you are.
12 Wonderful.

13 BD. MEM. DIMITRI: Thank you, Kyla. This is the
14 (audio distortion) in the world that calls me Dr. Dimitri.
15 It's so wonderful. I wish my students showed me as much
16 respect. Anyway, I'm only -- I'm being humorous, as usual,
17 as you know.

18 I'm Carolyn Dimitri. I'm in my last few weeks of
19 being on the NOSB, thus my giddy jokes of great fun. I'm a
20 professor of Food Studies at NYU. I am an applied
21 economist. I used to work for USDA's Economic Research
22 Service and helped launch a lot of their organic research
23 forward. So I'm -- and I sit in the Consumer and Public
24 Interest seat. And I've been eating organic food longer
25 than I've been studying organic food. And that's all I

1 have.

2 NOSB CHAIR BRUCH: Excellent.

3 BD. MEM. DIMITRI: By everyone.

4 NOSB CHAIR BRUCH: Lots of great fun facts.

5 That's really important. I wish, Dr. Dimitri, I could be a
6 student in your class. I would love that thoroughly. But
7 thank you for bringing your perspective, the economist
8 perspective, to the board and your rich talents. It's been
9 just an incredible conversation that you've been able to
10 provide some great data points on, so thank you so much.

11 All right, without further ado, I'm going to turn
12 it back over to Nate, our Crops Vice Chair, to keep rolling
13 with our agenda.

14 SECRETARY LEWIS: Great. And we'll play a game of
15 hot potato because we're going to be continuing with
16 Sunsets, and the next one up is Soaps, insecticidal, which
17 I'll kick back over to Amy.

18 NOSB CHAIR BRUCH: Yes. Okay, I will receive the
19 potato here. All right, we are rolling into insecticidal
20 soaps here: 205.601(e), and it's "As insecticides (including
21 acaricides or mite control)."

22 So essentially, with insecticidal soaps, it's a
23 foundational IPM, integrated pest management, tool. Some
24 describe this as a fundamental first-line defense for soft
25 pest control for organic systems, and these are for soft-

1 bodied insects. That's, kind of, the target for that, such
2 as aphids, whiteflies, mealybugs, and others.

3 There's longstanding use, and according to public
4 comments and our technical review, it's proven safety -- has
5 a proven safety profile. It's been allowed since before NOP
6 implementation and included in NOSB's earliest
7 recommendations. There's compatibility with beneficials and
8 pollinators. The commenters emphasized that insecticidal
9 soaps can be selective and fit well with biological control
10 programs. There's broad reliance on this. One commenter
11 mentioned nearly 700 operations are leveraging products with
12 this material base. And there were comments that said
13 not -- there are alternatives.

14 However, some of those alternatives aren't deemed
15 to be viable, compared to what the benefits of the
16 insecticidal soaps offer. Essentially, there were a few
17 comments received that expressed some concerns with
18 potential targets and impacts on non-target beneficial
19 insects or aquatic organisms, and one commenter suggested a
20 potential use-limiting annotation. But bottom line, public
21 commenters strongly supported continued listing of
22 insecticidal soaps as currently allowed.

23 Any questions?

24 (No response.)

25 NOSB CHAIR BRUCH: Okay, I am not seeing anything.

1 Thank you so much.

2 We will go to the vote here. There's a motion to
3 remove Soaps, insecticidal from the National List. It was
4 motioned by Amy, and seconded by Amanda. And we will start
5 the voting with Nate.

6 SECRETARY LEWIS: No.

7 NOSB CHAIR BRUCH: Cat.

8 BD. MEM. McCLUSKY: (No response.)

9 NOSB CHAIR BRUCH: Absent. Dilip.

10 BD. MEM. NANDWANI: No.

11 NOSB CHAIR BRUCH: Logan.

12 BD. MEM. PETREY LINKENHOGGER: No.

13 NOSB CHAIR BRUCH: Corie.

14 BD. MEM. PIERCE: No.

15 NOSB CHAIR BRUCH: Franklin.

16 BD. MEM. QUARCOO: No.

17 NOSB CHAIR BRUCH: Kyla.

18 BD. MEM. SMITH: No.

19 NOSB CHAIR BRUCH: Javier.

20 BD. MEM. ZAMORA: (No response.)

21 NOSB CHAIR BRUCH: Absent. Brian.

22 BD. MEM. CALDWELL: No.

23 NOSB CHAIR BRUCH: Kathryn.

24 BD. MEM. DESCHENES: No.

25 NOSB CHAIR BRUCH: Carolyn.

1 BD. MEM. DIMITRI: No.

2 NOSB CHAIR BRUCH: Amanda.

3 BD. MEM. FELDER: No.

4 NOSB CHAIR BRUCH: Andrea.

5 BD. MEM. HATZIYANNIS: No.

6 NOSB CHAIR BRUCH: Allison.

7 NOSB VICE CHAIR JOHNSON: No.

8 NOSB CHAIR BRUCH: And the Chair votes no. Okay,
9 back to you, Nate.

10 SECRETARY LEWIS: Zero yes, 13 no, zero
11 abstentions, zero recusals, two absent; the motion fails.

12 Okay, moving on, we have sucrose octanoate esters,
13 the OG SOE, and I'll turn that over to Franklin. That was
14 his material.

15 BD. MEM. QUARCOO: All right, can you -- can
16 everyone hear me?

17 SECRETARY LEWIS: Yeah.

18 BD. MEM. QUARCOO: Okay. Can you hear me?

19 SECRETARY LEWIS: Yes.

20 BD. MEM. QUARCOO: All right. So, I'll be calling
21 it SOE, so sucrose octanoate esters. This is listed at
22 205.601 as a pesticide. Specifically, it works against
23 soft-bodied insects, and also as an acaricide, so it
24 controls mites. It belongs to the sucrose fatty acid esters
25 group.

1 And one of the things I like to highlight about
2 this product is, you know, the constituents; they are made
3 up of sucrose and octanoic acid. So, you know, when the
4 constituents are, you know, harmless things that we have,
5 and when they do break down, they form water and carbon
6 dioxide, which are also things that we don't worry about.
7 So, this is actually -- and all the TR and all the
8 information that we gathered that was made available to us,
9 it shows that it actually has a better profile when it's
10 compared to some of the natural pesticides, in terms of what
11 it does to non-target organisms. That's the toxicity
12 profile.

13 I'll skip over the international acceptance,
14 because all over they were not explicitly mentioned in the
15 regulations.

16 And then I'll go to some of the public comments
17 and discussions that we had at the subcommittee level. When
18 it comes to the public comments, a coalition of stakeholders
19 talked about the fact that it is -- SOE is difficult to
20 apply and messy, so the reviews are mixed, let me put it
21 that way. There were folks who were for it and folks
22 against it. One organization actually stated that it should
23 be delisted because it is not essential for organic
24 production. And others said, no, they use it for all kinds
25 of things in controlling mites and soft-bodied insects in

1 their apple and pear orchards, and so it is a very important
2 product.

3 But I'll go back to the statement I made earlier.
4 When it comes to the profile, toxicity profile, even
5 compared to some of the natural product, it has less effects
6 on non-target organisms and all of that. And also the idea
7 of having farmers have as many tools in the toolbox as
8 possible. All of these led the Subcommittee to lean towards
9 not finding -- finding the substance to be compliant with
10 the Organic Food Production Act, and therefore there was a
11 vote to keep it on the National List.

12 That's about all I have on sucrose octanoate
13 esters, SOEs.

14 BD. MEM. CALDWELL: So I guess, I --

15 NOSB CHAIR BRUCH: Brian, go ahead.

16 BD. MEM. CALDWELL: Yeah, I just want to second
17 what Franklin said about tools in the toolbox, particularly
18 ones that are very non-toxic. And I think that over time,
19 new uses will be found for this material. Maybe some
20 specific pests will be more subject to it. It's, kind of, a
21 new one at this point, but I would strongly recommend that
22 we keep this on the list. As Franklin said, it's got a
23 really good environmental and health impact profile. So,
24 just wanted to put that out there.

25 SECRETARY LEWIS: All right, thanks.

1 NOSB CHAIR BRUCH: Excellent.

2 SECRETARY LEWIS: Any other comments before we
3 have Amy lead us to our vote?

4 (No response.)

5 SECRETARY LEWIS: All right, back to you, Amy.

6 NOSB CHAIR BRUCH: All right, thanks, Nate.

7 We have a motion to remove sucrose octanoate
8 esters, and that was a motion by Franklin, and seconded by
9 Brian. The voting starts with Cat.

10 BD. MEM. McCLUSKEY: (No response.)

11 NOSB CHAIR BRUCH: And she is absent. Dilip.

12 BD. MEM. NANDWANI: No.

13 NOSB CHAIR BRUCH: Logan.

14 BD. MEM. PETREY LINKENHOGGER: No.

15 NOSB CHAIR BRUCH: Corie.

16 BD. MEM. PIERCE: No.

17 NOSB CHAIR BRUCH: Franklin.

18 BD. MEM. QUARCOO: No.

19 NOSB CHAIR BRUCH: Kyla.

20 BD. MEM. SMITH: No.

21 NOSB CHAIR BRUCH: Javier.

22 BD. MEM. ZAMORA: (No response.)

23 NOSB CHAIR BRUCH: Absent. Brian.

24 BD. MEM. CALDWELL: No.

25 NOSB CHAIR BRUCH: Kathryn.

1 BD. MEM. DESCHENES: No.
2 NOSB CHAIR BRUCH: Kathryn?
3 BD. MEM. DESCHENES: No. No.
4 NOSB CHAIR BRUCH: Thank you. Carolyn.
5 BD. MEM. DIMITRI: No.
6 NOSB CHAIR BRUCH: Amanda.
7 BD. MEM. FELDER: No.
8 NOSB CHAIR BRUCH: Andrea.
9 BD. MEM. HATZIYANNIS: No.
10 NOSB CHAIR BRUCH: Allison.
11 NOSB VICE CHAIR JOHNSON: No.
12 NOSB CHAIR BRUCH: Nate.
13 SECRETARY LEWIS: No.
14 NOSB CHAIR BRUCH: And the Chair votes no.
15 SECRETARY LEWIS: Zero yes, 13 no, zero
16 abstentions, zero recusals, two absent. The vote fails.
17 The motion fails.
18 Okay, next up we have Vitamin D3. And, Amy, that
19 is your material.
20 NOSB CHAIR BRUCH: Thank you, Nate. Yes, the game
21 of hot potato seems like it's continuing here.
22 Okay, we have Vitamin D3 found at 205.601(g). And
23 this is described -- based -- I'm just going to highlight
24 some key points here. The use of Vitamin D3 is used to
25 essentially be a rodenticide for rodent control. It's

1 described through public comments as critical for managing
2 rodents in organic systems, particularly in tree fruits,
3 storage areas, bins, and buildings. Growers emphasize its
4 importance during high rodent pressure events. The use is
5 limited, but commenters mentioned it's necessary, and they
6 use it sparingly and strategically, and it is deployed
7 alongside other preventative and mechanical controls, such
8 as baits and traps, et cetera. And then there's fewer
9 secondary poisoning risks than the alternatives with Vitamin
10 D3. It's characterized as safer than some other methods
11 that are out there and available, and lower risk of
12 secondary poisoning. And there is compatibility with bait
13 stations and reduced impacts to scavenger birds when used
14 according to the label.

15 There's demonstrated and widespread reliance.
16 Commenters emphasize that rodent damage, and there were some
17 pictures in public comments that were actually quite
18 sobering there, but they can -- rodents can cause a lot of
19 damage and a serious economic and food safety risk. So
20 tools farmers mentioned, tools in the tool box are
21 necessary.

22 There was a few commenters that discussed the
23 potential for non-target species to have risk associated
24 with this. And they pointed to there are alternative
25 management options, but as we heard from growers, their best

1 success stories are using this in tandem. So public
2 comments strongly support continued listing, as they view
3 it's essential.

4 Any comments? Or anybody want to -- anybody have
5 any examples of this being used that they know of on their
6 farms?

7 Oh, Nate, go ahead. I see your hand.

8 SECRETARY LEWIS: Yeah. I'll just acknowledge and
9 repeat the importance of having multiple rodent control
10 measures. Traps, birds, you know, kestrel boxes are great,
11 cats are, you know, moderately effective. Having some sort
12 of bait station that, you know, can provide some effective
13 rodent control is really important. A lot of -- at least my
14 experience out in Washington State, a lot of berries are
15 grown with ground covers, which can -- which is -- are just
16 basically rodent highways, and then they go in and eat
17 the -- and girdle the bushes, so just having something
18 available that is a bait-based rodenticide is really
19 important.

20 NOSB CHAIR BRUCH: Thank you, Nate. Appreciate
21 that. All right, I'm not seeing any further discussion.

22 We will go to our vote here. There's a motion to
23 remove Vitamin D3 from the National List. Motioned by Amy,
24 seconded by Brian. And the voting will start with Dilip.

25 BD. MEM. NANDWANI: No.

1 NOSB CHAIR BRUCH: Logan.
2 BD. MEM. PETRY LINKENHOGGER: No.
3 NOSB CHAIR BRUCH: Corie.
4 BD. MEM. PIERCE: No.
5 NOSB CHAIR BRUCH: Franklin.
6 BD. MEM. QUARCOO: No.
7 NOSB CHAIR BRUCH: Kyla.
8 BD. MEM. SMITH: No.
9 NOSB CHAIR BRUCH: Javier.
10 BD. MEM. ZAMORA: (No response.)
11 NOSB CHAIR BRUCH: Absent. Brian.
12 BD. MEM. CALDWELL: No.
13 NOSB CHAIR BRUCH: Kathryn.
14 BD. MEM. DESCHENES: No.
15 NOSB CHAIR BRUCH: Carolyn.
16 BD. MEM. DIMITRI: No.
17 NOSB CHAIR BRUCH: Amanda.
18 BD. MEM. FELDER: No.
19 NOSB CHAIR BRUCH: Andrea.
20 BD. MEM. HATZIYANNIS: No.
21 NOSB CHAIR BRUCH: Allison.
22 NOSB VICE CHAIR JOHNSON: No.
23 NOSB CHAIR BRUCH: Nate.
24 SECRETARY LEWIS: No.
25 NOSB CHAIR BRUCH: Cat.

1 BD. MEM. McCLUSKY: (No response.)

2 NOSB CHAIR BRUCH: Absent. And the Chair votes
3 no.

4 SECRETARY LEWIS: Zero yes, 13 no, zero
5 abstentions, zero recusals, two absent; the motion fails.

6 All right, Amy, I think that might have been your
7 very last Crop Sunset presentation, which is a little
8 bittersweet, I think, because of your expertise in that
9 area. So, anyway, just wanted to acknowledge that.

10 NOSB CHAIR BRUCH: Thank you, Nate. I remember my
11 first one like it was yesterday. Goes by quick folks. But
12 thank you.

13 SECRETARY LEWIS: Okay, next up we have aquatic
14 plant extracts, and that is my material -- or a material I
15 led this time around, so I will jump into that.

16 So we have "Aquatic plant extracts, (other than
17 hydrolyzed) - extraction process is limited to the use of
18 potassium hydroxide or sodium hydroxide; solvent amount used
19 is limited to that amount necessary for extraction."

20 A couple of points I'll make here. So, aquatic
21 plant extracts are primarily a potassium fertilizer source.
22 It's a liquid product -- oftentimes a liquid product,
23 sometimes a spray-dried product, so meaning granular, but an
24 important use -- important foliar potassium and
25 micronutrient source of nutrients for crops.

1 There's a few issues related to its manufacture
2 that we've looked into. So previous boards spent a lot of
3 time looking at marine materials and the harvest of aquatic
4 plants, the potential damages to the marine ecosystem.
5 Based on that, and I'd be remiss not to acknowledge all that
6 past work from the Board that culminated in a series of
7 really robust recommendations to the Program, which the
8 Program declined to take rulemaking action on. So there is
9 a whole set of work related to the harvest of those
10 plants -- those aquatic plants, that goes into this that the
11 Board has worked on and the Program has declined to take up.

12 When it comes to the formulation of these products
13 specifically, this round we looked at a couple of issues.
14 One is examining that annotation that the solvent amount
15 used is limited to that amount necessary for extraction.
16 The concern -- sort of, the hypothetical concern would be
17 that someone might add some extra potassium hydroxide into
18 the formulation to get a higher potassium number on their
19 guaranteed analysis. What we learned from manufacturers and
20 from material review organizations is that is not really
21 practical. That doesn't get you necessarily more potassium
22 and actually can cause very serious problems with the
23 manufacturing process. So it is distinct from some of those
24 other fortification concerns that we see in acid-stabilized
25 liquid fish products. And, you know, I think the -- from my

1 perspective as the lead on this one, I was satisfied that
2 that is not a concern where a more specific annotation or a
3 removal of a particular extractant might be necessary to
4 avoid, sort of, unwanted fortification of these products
5 with various extractants.

6 There also was an elevation of an issue related to
7 that parenthetical, which is sort of a fascinating part of
8 our all -- all of our process here, where it appears as
9 though that parenthetical wasn't really initially meant to
10 become part of the rule, but perhaps due to transcription
11 snafu at some point it became part of the rule. Anyway, I
12 didn't particularly have too much time to unpack that one,
13 and acknowledging that we want to focus our program -- the
14 Program's limited standards development resources on, you
15 know, advancing the standard and evolving the standard, we
16 didn't, sort of, dive in -- in too deeply into that. But I
17 do want to acknowledge that there may be some work for
18 future boards, or maybe there's a comprehensive cleanup of
19 the National List that might be worthwhile, and this would
20 be a candidate for that.

21 I also want to acknowledge that we did get a
22 public comment related to an additional extractant, which
23 future boards may want to consider including in an updated
24 annotation, and that was potassium carbonate; allegedly a
25 less toxic or less caustic alkali material that can be used

1 for aquatic plant extracts, potentially moving it in a
2 direction of, you know, more environmental sustainability,
3 et cetera, et cetera.

4 So that is, I think, a summary of the
5 deliberations. I'll note that we did ask for a limited-
6 scope TR this round, and so that's posted on the website for
7 aquatic plant enthusiasts. It is good reading and really
8 dives in deep on those specific questions related to how
9 much extractant is necessary, what function those
10 extractants -- those caustic materials have on the product,
11 and aquatic plant extracts writ large.

12 So with that, I'll answer any questions that the
13 Board may have. Oh, I guess I'll just note that the motion
14 out of Subcommittee was a unanimous vote not to remove the
15 substance.

16 (No response.)

17 NOSB CHAIR BRUCH: Thank you, Nate, I really
18 appreciate that extra time you spent when going over this
19 material. And the summary of the public comments, that was
20 super helpful. I'm not seeing any questions.

21 There is a motion to remove aquatic plant
22 extracts. We will move into the vote then. Motioned by
23 Nate, seconded by Amy. And we'll start the voting with
24 Logan.

25 BD. MEM. PETREY LINKENHOGGER: No.

1 NOSB CHAIR BRUCH: Corie.
2 BD. MEM. PIERCE: No.
3 NOSB CHAIR BRUCH: Franklin.
4 BD. MEM. QUARCOO: No.
5 NOSB CHAIR BRUCH: Kyla.
6 BD. MEM. SMITH: No.
7 NOSB CHAIR BRUCH: Javier.
8 BD. MEM. ZAMORA: (No response.)
9 NOSB CHAIR BRUCH: Absent. Brian.
10 BD. MEM. CALDWELL: No.
11 NOSB CHAIR BRUCH: Kathryn.
12 BD. MEM. DESCHENES: No.
13 NOSB CHAIR BRUCH: Carolyn.
14 BD. MEM. DIMITRI: No.
15 NOSB CHAIR BRUCH: Amanda.
16 BD. MEM. FELDER: No.
17 NOSB CHAIR BRUCH: Thank you. Andrea.
18 BD. MEM. HATZIYANNIS: No.
19 NOSB CHAIR BRUCH: Allison.
20 NOSB VICE CHAIR JOHNSON: No.
21 NOSB CHAIR BRUCH: Nate.
22 SECRETARY LEWIS: No.
23 NOSB CHAIR BRUCH: Cat.
24 BD. MEM. McCLUSKY: (No response.)
25 NOSB CHAIR BRUCH: Absent. Dilip.

1 BD. MEM. NANDWANI: No.

2 NOSB CHAIR BRUCH: And the Chair votes no.

3 SECRETARY LEWIS: Zero yes, 13 no, zero
4 abstentions, zero recusals, two absent; the motion fails.

5 I think I'll also use this time, and this vote, as
6 an opportunity to, kind of, reflect on our annotation
7 process -- our annotation review process at time of Sunset.
8 And this is an example of a substance where we listened to
9 public comments. We evaluated whether or not an annotation,
10 a revised annotation, parallel motion was warranted. We got
11 more information. We discussed and deliberated within the
12 Subcommittee and decided that at this point we did not need
13 to move forward with an updated annotation. So anyway,
14 sometimes no action is the appropriate response. We don't
15 need to change every annotation every time, but just want to
16 acknowledge that process is working and making the Sunset
17 Reviews that much richer.

18 Next up is lignin sulfonate, which I am pinch
19 hitting for Logan. Lignin sulfonate is a synthetic crop or
20 soil amendment listed at 205.601(j)(4) as a chelating agent
21 and dust suppressant.

22 Lignin sulfonate is a byproduct of the paper
23 manufacturing process. Previously, it had been allowed as a
24 flotation agent in pear processing; that is no longer an
25 allowed use, and so it is only allowed in this particular

1 use, which is, as I mentioned, a chelating agent and dust
2 suppressant. So it is used essentially in all prilled
3 products, so you know, lime, dusty -- dusty mineral-type
4 products that then get prilled so that there's less dust and
5 there's easier application; that is its primary function.
6 It generally is a widely accepted product. From my review
7 of the public comments, it was widely -- you know, widely --
8 there was a wide concurrence that it should remain allowed
9 as a dust suppressant, and there really is nothing else
10 currently available that can meet this purpose.

11 There were also good comments related to the
12 general toxicity of lignin sulfonate, which I think the
13 Board should always keep in mind in its careful review of
14 substances and the balance of human and health -- human
15 health and environmental health concerns as it relates to
16 National List criteria. In this case, the Subcommittee
17 feels that it remains compliant with National List criteria
18 and should remain on the list. And I believe it passed out
19 of Subcommittee unanimously to that extent.

20 And with that, I'll answer any questions. And if
21 there are none, I'll turn it to Amy for the vote.

22 (No response.)

23 NOSB CHAIR BRUCH: All right, I'm not seeing any
24 questions here, Nate.

25 We'll move to the vote. There's a motion to

1 remove lignin sulfonate from the National List. It was
2 motioned by Logan, seconded by Nate. We'll start the voting
3 with Corie.

4 BD. MEM. PIERCE: No.

5 NOSB CHAIR BRUCH: Franklin.

6 BD. MEM. QUARCOO: No.

7 NOSB CHAIR BRUCH: Kyla.

8 BD. MEM. SMITH: No.

9 NOSB CHAIR BRUCH: Javier.

10 BD. MEM. ZAMORA: (No response.)

11 NOSB CHAIR BRUCH: Absent. Brian.

12 BD. MEM. CALDWELL: No.

13 NOSB CHAIR BRUCH: Kathryn.

14 BD. MEM. DESCHENES: No.

15 NOSB CHAIR BRUCH: Carolyn.

16 BD. MEM. DIMITRI: No.

17 NOSB CHAIR BRUCH: Amanda.

18 BD. MEM. FELDER: No.

19 NOSB CHAIR BRUCH: Andrea.

20 BD. MEM. HATZIYANNIS: No.

21 NOSB CHAIR BRUCH: Allison.

22 NOSB VICE CHAIR JOHNSON: No.

23 NOSB CHAIR BRUCH: Nate.

24 SECRETARY LEWIS: No.

25 NOSB CHAIR BRUCH: Cat.

1 BD. MEM. McCLUSKY: (No response.)

2 NOSB CHAIR BRUCH: Absent. Dilip.

3 BD. MEM. NANDWANI: No.

4 NOSB CHAIR BRUCH: Logan.

5 BD. MEM. PETREY LINKENHOGGER: No.

6 NOSB CHAIR BRUCH: And the Chair votes no. Thank
7 you.

8 SECRETARY LEWIS: Zero yes, 13 no, zero
9 abstentions, zero recusals, two absent; the motion fails.

10 Okay, moving on, we have fatty alcohols (C6, C8,
11 C10, C12), and Brian, that is you, I believe.

12 BD. MEM. CALDWELL: Thanks, Nate. Yep. So,
13 excuse me, this one might be a little more tricky than some
14 we've been going through. The fatty alcohols, there are
15 different chain links, that's what the 6 -- or yeaC6, C8,
16 C10, C12 mean. They're listed under 205.601(k) "As plant
17 growth regulators," and what they're -- they have a very
18 specific use, and that is to "remove suckers in organic
19 tobacco production."

20 And so, over the years, there's been controversy
21 about this, and mostly it's been around the negative health
22 risks associated with the tobacco crop. Just to keep in
23 mind that tobacco is a legal crop in the United States, and
24 some growers, you know, it's a major part of their
25 rotations. And it's important to note that the

1 environmental and human health impacts are very low with
2 this material. It can be an eye irritant if you actually
3 get it in your eye, but it breaks down quickly in the
4 environment. And, you know, if you get it on your leg or
5 something like that, it has virtually no effect. And it
6 does save workers from -- one of the alternatives, of which
7 the growers didn't feel like any of them were really viable,
8 but one of the alternatives is to take suckers off the
9 plants by hand. But if workers do that, they are exposed to
10 a lot of nicotine, and they can actually have nicotine, you
11 know, toxicity from that. So this prevents that from having
12 to happen.

13 There is a new concern, and that is that the
14 potential is for these materials to be created via
15 fermentation with excluded methods. And again, looking at
16 that issue, we don't have an overall fermentation excluded
17 methods framework at this point. And I would also say that
18 it's not clear that these materials actually are produced
19 that way, but they experimentally have been -- has --
20 there's potential for it.

21 So keeping all those things in mind, the Crop
22 Subcommittee was split on this material, and stakeholders
23 were very heavily in support of this material, with only one
24 opposed to relisting. So with that, I think I'll open it up
25 for discussion, and I would really like your help on this

1 one, so any, you know, thoughts are most welcome. Nate.

2 SECRETARY LEWIS: Yeah. I find the tobacco
3 conversation fascinating in organic, as we spend so much of
4 our time looking at National List criteria related to human
5 health. And tobacco is -- you know, and smoking is, very
6 clearly is a -- has negative health outcomes for the people
7 who choose to smoke, the people around them. The growing of
8 tobacco has health risks associated with it. So, it -- I
9 think it -- you know, that being said, Brian, you make the
10 point that tobacco is a legal crop. Organic is a system of
11 agriculture that applies to all crops. And, you know, for
12 better or worse, tobacco is an organic product.

13 So, all that being said, I think my recollection
14 around when this material was first petitioned, I remember
15 having a conversation with a grower who rotated, and you
16 mentioned it briefly, about tobacco being part of the
17 rotation, but tobacco is a pretty toxic plant in and of
18 itself, and because of its, sort of, natural toxicity, can
19 help with fungal disease control. And so the tobacco was an
20 essential part of this particular grower's rotation with
21 sweet potato, and he was a grower in North Carolina, I
22 believe, somewhere in the Southeast, and he said without
23 tobacco, organic wouldn't have been an option for him on
24 these other -- for these other cash crops.

25 So I'm compelled by the crop rotation argument of

1 it all. And while I would love to see a future without, you
2 know, children addicted to nicotine and without all the
3 products and health risks associated with tobacco use, at
4 this point, I think supporting the industry as it relates to
5 the myriad of crops that tobacco actually supports,
6 particularly in the Southeast, where we would love to see
7 more growth in organic acreage, is compelling for me to keep
8 the product on the list.

9 BD. MEM. CALDWELL: Yeah. Thanks, Nate. Nate, do
10 you want to manage the discussion, or should I?

11 SECRETARY LEWIS: I'll go ahead and do it. Yeah.
12 That's all right. Yeah. Amy and then Allison.

13 NOSB CHAIR BRUCH: Yeah, thank you. Thank you,
14 Brian. You are carrying on with your tradition of handling
15 the complex subject matter. Really appreciate the
16 background there. And thank you, Nate, for that example.

17 I just wanted to really say thanks to those that
18 participated in the public comment process. This was
19 helpful from my standpoint to just hear. I know there was
20 some outreach done for tobacco producers to comment on our
21 process, and many did and really pointed to the essentiality
22 of needing this tool to control the suckers. So that was
23 really moving to me to have data from farmers themselves
24 that are using this. Thank you.

25 SECRETARY LEWIS: Thanks, Amy. Go ahead, Allison.

1 NOSB VICE CHAIR JOHNSON: Thank you.

2 Brian, you always do such a great job at teasing
3 out these challenging issues and bringing all of the
4 relevant information to our attention, so thank you for
5 that.

6 And I agree this is a tricky one. I -- it's not a
7 perfect analogy, but for me, what comes up is organic candy.
8 You know, these are products that are going to exist out
9 there, so at least let's not use toxic chemicals to produce
10 them. And so, if the question is lose a lot of organic
11 tobacco and have it go back to conventional management, and
12 those other crops need -- I appreciated your point about
13 rotation -- other crops that may be rotated with tobacco,
14 that seems like a pretty big downside.

15 The other issue that comes to mind for me is that
16 the organic industry has not always thought about all types
17 of worker health in weighing materials versus manual
18 methods. You know, the short-handled hoe was a big
19 controversial one in the past. So here it sounds like there
20 is a real worker safety issue with the manual control
21 option. So if we can keep people safe who are working in
22 these fields that are likely to continue to exist, that
23 seems like a pretty good use of the National List to me.

24 SECRETARY LEWIS: Thanks. Thanks, Allison. Go
25 ahead, Kyla.

1 BD. MEM. SMITH: Thanks for the review. And I
2 guess my -- I just want to clarify the split vote, and was
3 the -- were those in favor of removal coming at that from
4 the health impacts of tobacco more so? I don't -- I'm just
5 like, can people who wanted to remove say more about that,
6 if you feel comfortable?

7 BD. MEM. CALDWELL: Well, Kyla, I think I -- I
8 think I voted against it just to be sure that we had a good
9 discussion of it. And I don't know who else voted, well,
10 against relisting. I'm not sure who the other person was.

11 BD. MEM. SMITH: Oh, well, just, like,
12 acknowledging that this is, like, a controversial, like,
13 material, and it's not a slam dunk. Got it.

14 BD. MEM. CALDWELL: Exactly.

15 BD. MEM. SMITH: Thank you. Appreciate it.

16 SECRETARY LEWIS: All right. Good discussion.
17 Amy, I'll have you lead us through the vote.

18 NOSB CHAIR BRUCH: Right. Thank you, Nate.

19 There's a motion to remove fatty alcohols from the
20 National List. Motioned by Brian, seconded by Amy. We're
21 going to start the voting with Franklin.

22 BD. MEM. QUARCOO: Abstain.

23 NOSB CHAIR BRUCH: Okay. Kyla.

24 BD. MEM. SMITH: No.

25 NOSB CHAIR BRUCH: Javier.

1 BD. MEM. ZAMORA: (No response.)
2 NOSB CHAIR BRUCH: Absent. Brian.
3 BD. MEM. CALDWELL: No.
4 NOSB CHAIR BRUCH: Kathryn.
5 BD. MEM. DESCHENES: No.
6 NOSB CHAIR BRUCH: Carolyn.
7 BD. MEM. DIMITRI: No.
8 NOSB CHAIR BRUCH: Amanda.
9 BD. MEM. FELDER: No.
10 NOSB CHAIR BRUCH: Andrea.
11 BD. MEM. HATZIYANNIS: No.
12 NOSB CHAIR BRUCH: Allison.
13 NOSB VICE CHAIR JOHNSON: No.
14 NOSB CHAIR BRUCH: Nate.
15 SECRETARY LEWIS: No.
16 NOSB CHAIR BRUCH: Cat.
17 BD. MEM. McCLUSKY: (No response.)
18 NOSB CHAIR BRUCH: Absent. Dilip.
19 BD. MEM. NANDWANI: Abstain.
20 NOSB CHAIR BRUCH: Logan.
21 BD. MEM. PETREY LINKENHOGGER: No.
22 NOSB CHAIR BRUCH: Corie.
23 BD. MEM. PIERCE: No.
24 NOSB CHAIR BRUCH: And the Chair votes no.
25 NOSB CHAIR BRUCH: Zero yes, 11 no, two

1 abstentions, zero recusals, two absent; the motion fails.

2 NOSB CHAIR BRUCH: All right, Nate, I'm just going
3 to jump in here and do a broad notice. We have five
4 materials left in Crops. We're trending just a little bit
5 behind schedule, so just a reminder on brevity, if possible,
6 but I do want to encourage the discussions. So brevity when
7 introducing if possible on some of these last remaining
8 substances.

9 SECRETARY LEWIS: So, we're going to cancel the
10 smoke break; is that what you said? All right.

11 NOSB CHAIR BRUCH: Yes. We'll keep moving here.

12 SECRETARY LEWIS: Okay, up next is sodium
13 silicate, a material that is listed at 205.601 "As floating
14 agents in post-harvest handling. Sodium silicate - for tree
15 fruit and fiber processing."

16 As I mentioned earlier in lignin sulfonate, which
17 was another material used to float pears, this is the one
18 remaining pear float available to organic pear handlers.
19 It's also listed for fiber processing, where previous TRS
20 indicate that it's used in some cotton processing, and I
21 think like jute twine. Unclear if that is a current use for
22 organic fiber producers, but never -- like, we did not get
23 any comments related to that side of it, but we did get
24 substantial comments related to its use in the tree fruit
25 industry.

1 And just as a very brief primer for folks, apples
2 float, pears sink when they're floated in water. And so if
3 you pack those crops and you use a water-based float flume,
4 your apples will do just fine with your -- with water, but
5 if you put -- if you dunk your pears into that, they will
6 all sink to the bottom and not float. And so they add a
7 flotation agent to, well, increase the density of water so
8 that pears float.

9 Increase the density of water; did I get that
10 right, chemists? Yeah. Not the -- not in the Science seat
11 here, so I've got enough to be dangerous, but I think I got
12 it right there. So we increase the density of water with
13 the sodium silicate, the pears then float and can be sorted
14 and packed into their various sizes and qualities.

15 We got substantial comments from the tree fruit
16 industry that the situation right now with pear packers is
17 pretty challenging. There overall is a dramatic decrease in
18 demand for pears. That is, interestingly, driven in part by
19 the reduced demand for canned pears. And so it's just a
20 sort of interesting, like, economic impact where, you know,
21 you grow a pear crop, and if you lose -- you know, the
22 canner -- the canned side of things is not the big
23 moneymaker, but if you lose just even that little amount of
24 your economic input, then it makes the whole crop less and
25 less profitable. And so there's still a strong demand for

1 fresh pears, but without that canned pear crop, it's
2 challenging for pear producers. As a result, the smaller
3 pear packers are not in a financial situation to invest in
4 more modernized and advanced equipment. So the larger pear
5 packers have, for the most part, moved to a dry packing
6 system so that they're not using these flotation agents.
7 They don't have a float requirement. The smaller pear
8 packers, which help to provide markets to generally smaller
9 and more isolated growers, have not yet been able to make
10 those financial investments and, with the prospects and
11 outlook right now of the pear market, aren't going to make
12 those upgrades and investments anytime soon.

13 So, all that to be said, from what we can tell
14 through public comments, it remains necessary in getting
15 organic market -- fresh market pears to -- oh, that was a
16 mouthful -- in getting fresh market pears to market. I'm
17 not being super -- I guess my moment for being concise has
18 ended earlier with compost. I'm being not very concise at
19 this point, but nevertheless, we heard from public comments
20 that it remains necessary, and as a result, it has -- the
21 Crop Subcommittee is not recommending its removal from the
22 National List.

23 NOSB CHAIR BRUCH: Excellent, Nate. That was
24 highly informative. Any questions for Nate?
25 (No response.)

1 NOSB CHAIR BRUCH: I love learning about the
2 nuances with all the different members of our family -- crop
3 members of our family, so that was great. All right. Not
4 seeing any hands.

5 Motion to remove sodium silicate from the National
6 List. It was motioned by Nate, seconded by Brian. We will
7 start the with Kyla.

8 BD. MEM. SMITH: No.

9 NOSB CHAIR BRUCH: Javier.

10 BD. MEM. ZAMORA: (No response.)

11 NOSB CHAIR BRUCH: Absent. Brian.

12 BD. MEM. CALDWELL: No.

13 NOSB CHAIR BRUCH: Kathryn.

14 BD. MEM. DESCHENES: No.

15 NOSB CHAIR BRUCH: Carolyn.

16 BD. MEM. DIMITRI: No.

17 NOSB CHAIR BRUCH: Amanda.

18 BD. MEM. FELDER: No.

19 NOSB CHAIR BRUCH: Andrea.

20 BD. MEM. HATZIYANNIS: No.

21 NOSB CHAIR BRUCH: Allison.

22 NOSB VICE CHAIR JOHNSON: No.

23 NOSB CHAIR BRUCH: Nate.

24 SECRETARY LEWIS: No.

25 NOSB CHAIR BRUCH: Cat.

1 BD. MEM. McCLUSKY: (No response.)

2 NOSB CHAIR BRUCH: Absent. Dilip.

3 BD. MEM. NANDWANI: No.

4 NOSB CHAIR BRUCH: Logan.

5 BD. MEM. PETREY LINKENHOGGER: No.

6 NOSB CHAIR BRUCH: Corie.

7 BD. MEM. PIERCE: Nope.

8 NOSB CHAIR BRUCH: Franklin.

9 BD. MEM. QUARCOO: No.

10 NOSB CHAIR BRUCH: Thank you. And the Chair votes
11 no.

12 SECRETARY LEWIS: Zero yes, 13 no, zero
13 abstentions, zero recusal, two absent; the motion fails.

14 All right, moving on, EPA List 4, Brian's favorite
15 group of substances, which I believe will be his final Crop
16 Sunset presentation, so, how fitting. And I think you and
17 I, kind of, tag teamed this one, but I'll let you take the
18 lead on it and add some context if it's necessary.

19 BD. MEM. CALDWELL: Hey, thanks so much, Nate.
20 Yeah, List 4, lots of -- lots of previous discussion on this
21 over many years. It's got its own spot there in the -- on
22 the National List. Basically, the situation is that List 4
23 inerts are used in most, if not all -- almost all, pesticide
24 formulations. And currently, after last year -- after the
25 spring meeting, I guess this year, or was it a year ago? I

1 can't remember when we did it, but we passed a major
2 recommendation that the -- that is now in rulemaking with
3 NOP. And our situation is that until the new rule is
4 finalized, it would be extremely disruptive to delist this -
5 - all the List 4 Inerts, because virtually all the
6 pesticides used by organic farmers would either be, you
7 know, not available or have to be reformulated. Stakeholder
8 comments, I counted 15 in in favor and two opposed for
9 relisting. And the Crop Subcommittee vote was unanimous to
10 relist.

11 So with that, Nate, if you have anything else to
12 add? I'm -- that's it for me.

13 SECRETARY LEWIS: The only thing I'll add -- you
14 know, great job, Brian, as that -- you know, the outcome
15 would have been different, I would guess, at the
16 subcommittee level if we had not done all the work and
17 passed the recommendation last fall.

18 BD. MEM. CALDWELL: Um-hmm.

19 SECRETARY LEWIS: So I think knowing there is
20 action on the horizon gave the -- at least myself on the
21 subcommittee, confidence that renewing its listing now is
22 acceptable because we -- there is something on the horizon,
23 some change and modernization on the horizon. So, it's the
24 only thing I'll add.

25 Any other comments or questions related to the

1 List 4 substances?

2 (No response.)

3 SECRETARY LEWIS: Okay. Seeing none, I'll have
4 Amy lead us for the vote.

5 NOSB CHAIR BRUCH: Excellent. And thank you both
6 for your contributions to this very complex subject matter.

7 All right, we will -- we have a motion to remove
8 EPA List 4 Inerts from the National List. Motioned by
9 Brian, seconded by Logan. We will start the voting with
10 Javier.

11 BD. MEM. ZAMORA: (No response.)

12 NOSB CHAIR BRUCH: And he is absent. Brian.

13 BD. MEM. CALDWELL: No.

14 NOSB CHAIR BRUCH: Kathryn.

15 BD. MEM. DESCHENES: No.

16 NOSB CHAIR BRUCH: Carolyn.

17 BD. MEM. DIMITRI: No.

18 NOSB CHAIR BRUCH: Amanda.

19 BD. MEM. FELDER: No.

20 NOSB CHAIR BRUCH: Andrea.

21 BD. MEM. HATZIYANNIS: No.

22 NOSB CHAIR BRUCH: Allison.

23 NOSB VICE CHAIR JOHNSON: No.

24 NOSB CHAIR BRUCH: Nate.

25 SECRETARY LEWIS: No.

1 NOSB CHAIR BRUCH: Cat.

2 BD. MEM. McCLUSKY: (No response.)

3 NOSB CHAIR BRUCH: Absent. Dilip.

4 BD. MEM. NANDWANI: No.

5 NOSB CHAIR BRUCH: Logan.

6 BD. MEM. PETREY LINKENHOGGER: No.

7 NOSB CHAIR BRUCH: Corie.

8 BD. MEM. PIERCE: No.

9 NOSB CHAIR BRUCH: Franklin.

10 BD. MEM. QUARCOO: No.

11 NOSB CHAIR BRUCH: Kyla.

12 BD. MEM. SMITH: No.

13 NOSB CHAIR BRUCH: And the Chair votes no. Thank
14 you.

15 SECRETARY LEWIS: Zero yes, 13 no, zero
16 abstentions, zero recusals, two absent; the motion fails.

17 Okay, next up is paper-based crop planting aids,
18 also known as paper pots. I am pinch hitting this one for
19 Logan, as well, and I may phone a friend in Vermont to help
20 get some perspective on growers up there, but I will do the
21 presentation here and see where we end up, okay? Bear with
22 me as I move forward on my -- there we go.

23 Okay, so paper in this instance is listed at
24 205.601(o), "Production Aids." "Paper-based crop planting
25 aids as defined in 205.2. Virgin or recycled paper without

1 glossy paper or colored inks. The definition of paper-based
2 crop production and planting aid is a material that is
3 comprised of at least 60 percent cellulose-based fiber by
4 weight, including but not limited to, pots, seed tape,
5 .collars that are placed in or on the soil and later
6 incorporated into the soil, excluding biodegradable mulch
7 film. Up to 40 percent of the ingredients can be
8 nonsynthetic, other permitted synthetic ingredients in
9 205.601(j), or synthetic strengthening fibers, adhesives, or
10 resins. Contains no less than 80 percent biobased content
11 as verified by a qualified third-party assessment (e.g.,
12 laboratory test using ASTM D6866 or composition review by
13 qualified personnel).

14 So that will be on the quiz at the end of the
15 meeting for folks who are so interested. But these
16 substances, this is the end result of a lot of really good
17 work by previous boards on hitting the right target here, by
18 getting growers the tool they need, particularly small
19 growers who are using these a lot for transplant tapes and,
20 sort of, like chain paper pot, and it really reduces labor
21 in the transplant process, you know, striking the balance
22 between what growers need with what kind of synthetic
23 composition is acceptable based on National List criteria.
24 This is a common theme that will -- you'll -- you've heard
25 from me as it relates to compost, is that the listings for

1 paper need work. I think this one is a good example of what
2 a more modern and current board approach might look like for
3 other listings of paper on the National List, so I'm, sort
4 of, flagging that as a good example. It's, I think, also a
5 good example of how ASTM standards can be incorporated as an
6 example, but maybe we don't hang our hat entirely on those
7 types of standards for, you know, our review process.

8 Public comments that I was able to read further
9 reinforce that it remains a necessary tool for growers. I
10 was interested in seeing and reading some comments related
11 to what I hold near and dear in a stakeholder group that I
12 feel very strongly about representing, which is the tree
13 fruit growers in the Pacific Northwest, and how much paper
14 is used in their process -- or in their industry for
15 transplanting replacement trees, for collars, and some other
16 uses that I was not as familiar with. I was very -- you
17 know, I was aware of the paper pots and many of my friends
18 who were small growers are really excited about that, but I
19 hadn't learned, and found this process informing about how
20 it's used at all -- in many, many scales and in some of the
21 crop producers that you wouldn't normally think about doing
22 that.

23 So I think with that, I'll -- I don't know, I want
24 to make opportunity for other folks to weigh in. And Corie,
25 if you had more to add, I just -- you know, I -- like, this,

1 sort of, like came from Vermont as a -- or the Northeast in
2 a lot of ways, so if there's anything specific you want to
3 add, please feel free. Don't -- also don't feel obligated
4 to, and I'll solicit feedback on this particular substance
5 at this point.

6 BD. MEM. PIERCE: Yeah, I can just quickly say
7 that it's very -- paper pots are widely used by small veg
8 growers up here, and that's true all over New England, and I
9 know also in lots of other regions of the country, so
10 definitely an important product for small, diversified veg
11 growers.

12 SECRETARY LEWIS: Okay, thanks. Kyla.

13 BD. MEM. SMITH: Yeah, I believe this is the first
14 sunset review for this material, if I have my timeline
15 correct, and one comment that I noted from a certifier
16 indicated that they've been seeing increased use of these
17 materials. And so, again, I have a material in Handling
18 which is also relatively new, and it's -- sometimes it's
19 like a little bit of a slow ramp up, and I know that this
20 material was being used and there was some discrepancy on
21 whether or not it was allowed or not allowed, and so it went
22 through the petition process. So maybe this is a little bit
23 different in that, you know, growers were already, sort of,
24 using it, and we had to, like, make sure we got the list
25 jiving with what was happening in practice. And I will say

1 that from at least some comments I saw, that there was now
2 additional increased usage.

3 SECRETARY LEWIS: Yeah, interesting. And
4 appreciate that added context on the evolution of its use
5 and allowance, right? That would -- it did arise as an
6 inconsistent material review between certifiers; some
7 certifiers were allowing it, and some certifiers were not,
8 and it's been harmonized now, and yeah, seeing that
9 increased use across the sector is important to keep in mind
10 as we continue our evaluation.

11 All right. Any other comments? If not, I'll hand
12 it back to you, Amy, to lead us through the vote.

13 (No response.)

14 NOSB CHAIR BRUCH: Excellent. Nate, thank you so
15 much for your leadership there. And Corie, thanks for your
16 comments.

17 There is a motion to remove paper-based crop
18 planting aids from the National List. It was motioned by
19 Logan, seconded by Nate. We'll start the voting with Brian.

20 BD. MEM. CALDWELL: No.

21 NOSB CHAIR BRUCH: Kathryn.

22 BD. MEM. DESCHENES: No.

23 NOSB CHAIR BRUCH: Carolyn.

24 BD. MEM. DIMITRI: No.

25 NOSB CHAIR BRUCH: Amanda.

1 BD. MEM. FELDER: No.
2 NOSB CHAIR BRUCH: Andrea.
3 BD. MEM. HATZIYANNIS: No.
4 NOSB CHAIR BRUCH: Allison.
5 NOSB VICE CHAIR JOHNSON: No.
6 NOSB CHAIR BRUCH: Nate.
7 SECRETARY LEWIS: No.
8 NOSB CHAIR BRUCH: Cat.
9 BD. MEM. McCLUSKY: (No response.)
10 NOSB CHAIR BRUCH: Absent. Dilip.
11 BD. MEM. NANDWANI: No.
12 NOSB CHAIR BRUCH: Logan.
13 BD. MEM. PETREY LINKENHOGGER: No.
14 NOSB CHAIR BRUCH: Corie.
15 BD. MEM. PIERCE: No.
16 NOSB CHAIR BRUCH: Franklin.
17 BD. MEM. QUARCOO: No.
18 NOSB CHAIR BRUCH: Kyla.
19 BD. MEM. SMITH: No.
20 NOSB CHAIR BRUCH: Javier.
21 BD. MEM. ZAMORA: (No response.)
22 NOSB CHAIR BRUCH: Absent. And the Chair votes
23 no.
24 SECRETARY LEWIS: Zero yes, 13 no, zero
25 abstentions, zero recusals, two absent; the motion fails.

1 SECRETARY LEWIS: Okay, so now we are going to do
2 a little bit of mental gymnastics as we move into the next
3 section of Sunset Reviews, and these are for our
4 nonsynthetic substances, which are prohibited in organic.
5 And, you know, again, it's a really good rule of thumb that
6 a no vote is to keep the list the same, a yes vote is to
7 change it. And in the case of these prohibited
8 nonsynthetics, a yes vote would be to make these things
9 allowed, because they're nonsynthetic, and a no vote would
10 be to keep the list the same and keep these substances as
11 prohibited naturals.

12 So now that we've got that cleared up, I will move
13 it over to Corie, I believe, who's got arsenic.

14 BD. MEM. PIERCE: Yeah. So arsenic, a
15 nonsynthetic prohibited substance, and it's pretty
16 straightforward: toxic material that is not used in organic
17 production. I don't -- there -- no one -- that everyone's
18 in agreement on that, and I don't think we need to go too
19 much into it.

20 SECRETARY LEWIS: All right. It was toxic. Still
21 is toxic. Nothing -- no new -- no new information to change
22 that.

23 BD. MEM. PIERCE: Right.

24 SECRETARY LEWIS: Amy, would you take us through
25 the vote on that?

1 NOSB CHAIR BRUCH: Absolutely. Thank you, Corie.

2 Really appreciate your contributions there.

3 There's a motion to remove arsenic from the
4 National List. It was motioned by Corie, seconded by
5 Amanda. We'll start the voting with Kathryn.

6 BD. MEM. DESCHENES: No.

7 NOSB CHAIR BRUCH: Carolyn.

8 BD. MEM. DIMITRI: No.

9 NOSB CHAIR BRUCH: Amanda.

10 BD. MEM. FELDER: No.

11 NOSB CHAIR BRUCH: Andrea.

12 BD. MEM. HATZIYANNIS: No.

13 NOSB CHAIR BRUCH: Allison.

14 NOSB VICE CHAIR JOHNSON: No.

15 NOSB CHAIR BRUCH: Nate.

16 SECRETARY LEWIS: No.

17 NOSB CHAIR BRUCH: Cat.

18 BD. MEM. McCLUSKY: (No response.)

19 NOSB CHAIR BRUCH: Absent. Dilip.

20 BD. MEM. NANDWANI: (No response.)

21 NOSB CHAIR BRUCH: Dilip?

22 BD. MEM. NANDWANI: No. I didn't hear you, Amy.

23 NOSB CHAIR BRUCH: Oh, I'm sorry about that.

24 Okay, thank you.

25 BD. MEM. NANDWANI: No worries.

1 NOSB CHAIR BRUCH: Appreciate that. All right,
2 Logan.

3 BD. MEM. PETREY LINKENHOGGER: No.

4 NOSB CHAIR BRUCH: Corie.

5 BD. MEM. PIERCE: No.

6 NOSB CHAIR BRUCH: Franklin.

7 BD. MEM. QUARCOO: No.

8 NOSB CHAIR BRUCH: Kyla.

9 BD. MEM. SMITH: No.

10 NOSB CHAIR BRUCH: Javier.

11 BD. MEM. ZAMORA: (No response.)

12 NOSB CHAIR BRUCH: Absent. Brian.

13 BD. MEM. CALDWELL: No.

14 NOSB CHAIR BRUCH: Chair votes no.

15 SECRETARY LEWIS: Zero yes, 13 no, zero
16 abstentions, zero recusals, two absent; the motion fails.

17 SECRETARY LEWIS: And maybe in this case, last and
18 least, strychnine, right? Not you, Amanda, as the lead on
19 it, but the substance itself.

20 BD. MEM. FELDER: Yes.

21 SECRETARY LEWIS: That we have strychnine, which
22 is also a prohibited natural, and I'll turn it over to
23 Amanda to lead us through that one.

24 BD. MEM. FELDER: So strychnine is only allowed
25 outside of organic production, underground to control pocket

1 gophers, so it's something that's already limited in use
2 here in the U.S. It's highly toxic, which is why it's only
3 allowed in such limited use. Almost every public comment
4 was to continue to keep this delisted, or prohibited, I
5 suppose. And then saying this has been unanimously kept on
6 as a prohibited substance since its inception. So the
7 Subcommittee is recommending that we continue to keep this
8 on the National List as a prohibited substance.

9 SECRETARY LEWIS: Great. Thanks, Amanda.

10 Amy, you want to lead us through the vote?

11 NOSB CHAIR BRUCH: Absolutely. Thank you, Amanda.
12 I'm not seen any questions here.

13 There's a motion to remove strychnine from the
14 National List. It was motioned by Amanda, seconded by Amy.
15 We'll start the voting with Carolyn.

16 BD. MEM. DIMITRI: No.

17 NOSB CHAIR BRUCH: Thank you. Amanda.

18 BD. MEM. FELDER: No.

19 NOSB CHAIR BRUCH: Andrea.

20 BD. MEM. HATZIYANNIS: No.

21 NOSB CHAIR BRUCH: Allison.

22 NOSB VICE CHAIR JOHNSON: No.

23 NOSB CHAIR BRUCH: Nate.

24 SECRETARY LEWIS: No.

25 NOSB CHAIR BRUCH: Cat.

1 BD. MEM. McCLUSKY: (No response.)
2 NOSB CHAIR BRUCH: Absent. Dilip.
3 BD. MEM. NANDWANI: No.
4 NOSB CHAIR BRUCH: Logan.
5 BD. MEM. PETREY LINKENHOGGER: No.
6 NOSB CHAIR BRUCH: Corie.
7 BD. MEM. PIERCE: No.
8 NOSB CHAIR BRUCH: Franklin.
9 BD. MEM. QUARCOO: No.
10 NOSB CHAIR BRUCH: Kyla.
11 BD. MEM. SMITH: No.
12 NOSB CHAIR BRUCH: Javier.
13 BD. MEM. ZAMORA: (No response.)
14 NOSB CHAIR BRUCH: Absent. Brian.
15 BD. MEM. CALDWELL: No.
16 NOSB CHAIR BRUCH: Kathryn.
17 BD. MEM. DESCHENES: No.
18 NOSB CHAIR BRUCH: Chair votes no.
19 SECRETARY LEWIS: Zero yes, 13 no, zero
20 abstentions, zero recusals, two absent; the motion fails.
21 SECRETARY LEWIS: And with that, I turn the floor
22 back over to Amy. That's the conclusion of the Crop
23 Subcommittee. And thank you all so very much for all your
24 hard work.
25 NOSB CHAIR BRUCH: Excellent. Thank you so much.

1 Crop Subcommittee definitely showed collaborative leadership
2 there and teamwork. Really appreciate, Nate, you stepping
3 up and shepherding the process and tackling the challenging
4 subject matter.

5 And also I wanted to thank Logan for her service
6 and leadership. She was the Chair of this committee for the
7 majority of the season. So thank you for your time and
8 leadership there, as well.

9 I am going to pass over the microphone to our
10 Handling Chair, Allison, for the next segment. Thank you.

11 NOSB VICE CHAIR JOHNSON: Thanks, Amy.

12 All right, so we've got about an hour and a half,
13 a little bit less left, so I'm going to spare you my "Hi,
14 everyone" lines and just jump right into it. Well, let me
15 just stop and say great subcommittee. We're going to miss
16 our outgoing members. We're excited about our new members.
17 And in addition to Sunsets, we have some interesting
18 petitions in the queue, and have appreciated working with
19 the food technologists this year. So we have one
20 reclassification and then a bunch of Sunsets to get through,
21 including a lot of 606 materials that will have some
22 discussion.

23 So I'll hand it to myself to start us off with L-
24 malic acid reclassification. So this is a proposal to add
25 synthetic L-malic acid to the National List while retaining

1 the nonsynthetic listing as well. So as a reminder, there
2 are two main pathways to make L-malic acid; one just uses
3 carbohydrates, sugars, and the other starts from petroleum
4 products. The petroleum-products pathway is essentially the
5 only commercially available option, which was not well
6 understood when the material was originally added to the
7 list as a nonsynthetic.

8 We discussed the reclassification in the spring.
9 And the Subcommittee had brought forward an idea of maybe
10 attaching a commercial availability requirement to the
11 synthetic listing in recognition that the intent was really
12 to send handlers toward using the nonsynthetic versions. We
13 appreciated the public comments that we got that told us
14 that was actually a terrible idea, would be hard to do,
15 wouldn't give us real meaningful change, so we have dropped
16 that in the proposal.

17 And there were two other main concerns that were
18 raised in discussions. One was precedent; so will the Board
19 continue to add synthetic versions of materials to the
20 National List in the future? Are we opening up a can of
21 worms where the board just goes rogue? The answer is no.
22 This was a pretty unique situation in that there was an
23 initial assumption about how the material would be available
24 in the nonsynthetic form. That assumption turned out to be
25 wrong, and we're not aware of any of that kind of history

1 for other listed materials. If something else did arise, we
2 deal with it on a case-by-case basis.

3 The other question is around fermentation
4 products. So questions about excluded methods in growth
5 media and how far back to look in the process for fermented
6 materials. So these are big questions. They relate to a
7 number of materials that are on the National List. So the
8 Subcommittee's recommendation was to deal with this specific
9 listing issue narrowly, and then take up those lingering
10 questions about fermentation in the broader context so that
11 we can deal with those consistently rather than trying to,
12 sort of, piecemeal deal with it as we solve this listing
13 problem.

14 There was unanimous support from the Subcommittee
15 for reclassification. And generally the comments that we
16 received supported aligning regs with practice, which is
17 what this proposal does. There was no opposition. The main
18 comments around concerns were about these fermentation
19 processes and how we'll deal with them moving forward.

20 So short summary of a slightly complicated topic,
21 but I think the path is quite clear at this point and
22 welcome any discussion.

23 (No response.)

24 NOSB VICE CHAIR JOHNSON: All right, seeing none,
25 we have a couple of votes for Amy to lead us in on this one.

1 NOSB CHAIR BRUCH: Great, Allison. Thank you for
2 your summary there. Really appreciate all the work you did.
3 This was also a complicated issue, but your explanation was
4 really helpful. Thank you so much.

5 All right, as Allison mentioned, we have a series
6 of three votes for the substance here. First motion is to
7 classify L-malic acid produced by fermentation and/or
8 enzymatic conversion of carbohydrates as synthetic. It was
9 motioned by Allison, seconded by Kyla. We will start the
10 vote with Amanda here.

11 BD. MEM. SMITH: Hold on. Point of --

12 NOSB CHAIR BRUCH: Kyla?

13 BD. MEM. SMITH: Just point of clarification. You
14 said, "as synthetic." It as "nonsynthetic."

15 NOSB CHAIR BRUCH: Oh, sorry. Thank you very
16 much. I really appreciate that. And that will not be the
17 last time I do make a very critical error here, so thank
18 you. Be listening for them. I'm going to just restate this
19 just so there's no confusion. Thank you, Kyla, again.

20 All right, the motion is to classify L-malic acid
21 produced by fermentation and/or enzymatic conversion of
22 carbohydrates as nonsynthetic. Motioned by Allison,
23 seconded by Kyla. Thank you again. We will start the vote
24 with Amanda.

25 BD. MEM. FELDER: Yes.

1 NOSB CHAIR BRUCH: Andrea.
2 BD. MEM. HATZIYANNIS: Yes.
3 NOSB CHAIR BRUCH: Allison.
4 NOSB VICE CHAIR JOHNSON: Yes. Did we skip one?
5 NOSB CHAIR BRUCH: I don't think so, but thank you
6 for checking.
7 All right, Nate.
8 SECRETARY LEWIS: Yes.
9 NOSB CHAIR BRUCH: Cat.
10 BD. MEM. McCLUSKY: (No response.)
11 NOSB CHAIR BRUCH: Absent. Dilip.
12 BD. MEM. NANDWANI: Yes.
13 NOSB CHAIR BRUCH: Logan.
14 BD. MEM. PETREY LINKENHOGGER: (No response.)
15 NOSB CHAIR BRUCH: Absent. Corie.
16 BD. MEM. PIERCE: Yes.
17 NOSB CHAIR BRUCH: Franklin.
18 BD. MEM. QUARCOO: Yes.
19 NOSB CHAIR BRUCH: Kyla.
20 BD. MEM. SMITH: Yes.
21 NOSB CHAIR BRUCH: Javier.
22 BD. MEM. ZAMORA: (No response.)
23 NOSB CHAIR BRUCH: Absent. Brian.
24 BD. MEM. CALDWELL: Yes.
25 NOSB CHAIR BRUCH: Kathryn.

1 BD. MEM. DESCHENES: Yes.

2 NOSB CHAIR BRUCH: Carolyn.

3 BD. MEM. DIMITRI: Yes.

4 NOSB CHAIR BRUCH: The Chair votes yes.

5 SECRETARY LEWIS: Let's see, 12 yes, zero no, zero
6 abstentions, zero recusals, three absent; the motion
7 carries.

8 NOSB CHAIR BRUCH: All right, thank you.

9 We'll move on to the second motion here. Motion
10 to classify L-malic acid produced from synthetic fumaric
11 acid as synthetic. Motioned by Allison, seconded by Dilip.
12 Start the with Andrea.

13 BD. MEM. HATZIYANNIS: Yes.

14 NOSB CHAIR BRUCH: Allison.

15 NOSB VICE CHAIR JOHNSON: Yes.

16 NOSB CHAIR BRUCH: Nate.

17 SECRETARY LEWIS: Yes.

18 NOSB CHAIR BRUCH: Cat.

19 BD. MEM. McCLUSKY: (No response.)

20 NOSB CHAIR BRUCH: Absent. Dilip.

21 BD. MEM. NANDWANI: Yes.

22 NOSB CHAIR BRUCH: Logan.

23 BD. MEM. PETREY LINKENHOGGER: (No response.)

24 NOSB CHAIR BRUCH: Absent. Corie.

25 BD. MEM. PIERCE: Yes.

1 NOSB CHAIR BRUCH: Franklin.
2 BD. MEM. QUARCOO: (No response.)
3 NOSB CHAIR BRUCH: Franklin?
4 BD. MEM. QUARCOO: Yes. Having a problem. I
5 couldn't --
6 NOSB CHAIR BRUCH: No problem.
7 BD. MEM. QUARCOO: Yes.
8 NOSB CHAIR BRUCH: Thank you so much. Gotcha.
9 All right, Kyla.
10 BD. MEM. SMITH: Yes.
11 NOSB CHAIR BRUCH: Javier.
12 BD. MEM. ZAMORA: (No response.)
13 NOSB CHAIR BRUCH: Absent. Brian.
14 BD. MEM. CALDWELL: Yes.
15 NOSB CHAIR BRUCH: Kathryn.
16 BD. MEM. DESCHENES: Yes.
17 NOSB CHAIR BRUCH: Carolyn.
18 BD. MEM. DIMITRI: Yes. Sorry, my mouse is slow.
19 NOSB CHAIR BRUCH: Oh, no worries, no worries.
20 Amanda.
21 BD. MEM. FELDER: Yes.
22 NOSB CHAIR BRUCH: And the Chair votes yes.
23 SECRETARY LEWIS: We have 12 yes, zero no, zero
24 abstentions, zero recusals, three absent; the motion
25 carries.

1 NOSB CHAIR BRUCH: Thank you. I have to do my
2 best to distinguish from dramatic pauses and absences, so
3 bear with me here. Thank you.

4 All right, final motion in this series here,
5 motion to add synthetic L-malic acid to 205.605(b).
6 Motioned by Allison, seconded by Kyla. We will start the
7 voting with Allison.

8 NOSB VICE CHAIR JOHNSON: Yes.

9 NOSB CHAIR BRUCH: Nate.

10 SECRETARY LEWIS: Yes.

11 NOSB CHAIR BRUCH: Cat.

12 BD. MEM. McCLUSKY: (No response.)

13 NOSB CHAIR BRUCH: Absent. Dilip.

14 BD. MEM. NANDWANI: Yes.

15 NOSB CHAIR BRUCH: Logan.

16 BD. MEM. PETREY LINKENHOGGER: (No response.)

17 NOSB CHAIR BRUCH: Absent. Corie.

18 BD. MEM. PIERCE: Yes.

19 NOSB CHAIR BRUCH: Franklin.

20 BD. MEM. QUARCOO: Yes.

21 NOSB CHAIR BRUCH: Kyla.

22 BD. MEM. SMITH: Yes.

23 NOSB CHAIR BRUCH: Javier.

24 BD. MEM. ZAMORA: (No response.)

25 NOSB CHAIR BRUCH: Absent. Brian.

1 BD. MEM. CALDWELL: Yes.

2 NOSB CHAIR BRUCH: Kathryn.

3 BD. MEM. DESCHENES: Yes.

4 NOSB CHAIR BRUCH: Carolyn.

5 BD. MEM. DIMITRI: Yes.

6 NOSB CHAIR BRUCH: Amanda.

7 BD. MEM. FELDER: Yes.

8 NOSB CHAIR BRUCH: Andrea.

9 BD. MEM. HATZIYANNIS: Yes.

10 NOSB CHAIR BRUCH: And the Chair votes yes.

11 SECRETARY LEWIS: Twelve yes, zero no, zero
12 abstentions, zero recusals, three absent; the motion
13 carries.

14 NOSB VICE CHAIR JOHNSON: All right, thank you
15 all. It's good to have that one cleaned up and off the Work
16 Agenda. It's been a long time coming. And thanks, Nate, I
17 think it was you that brought this forward and nudged us to
18 get moving on it, so we love to see issues tied up with a
19 bow so we can move on to the next one.

20 All right, so shifting into Sunset land, we have a
21 number to get through, and the first one up is kaolin with
22 Kathryn.

23 BD. MEM. DESCHENES: All right. So kaolin is
24 listed at 205.605(a)(15) as a nonsynthetic. And kaolin is a
25 fine clay that's highly absorbive -- absorptive and used

1 mostly in organic fruit production.

2 Overall, commenters expressed strong support for
3 continuing kaolin's listing. Several commenters highlighted
4 its importance in juice to ensure that juices meet consumer
5 expectations. A couple of comments noted that there's a
6 nano-kaolin, some nano-kaolins that can be produced, and
7 suggested annotating. But overall, kaolin was viewed as a
8 low-impact, well-understood material, and had broad support
9 for relisting.

10 Any questions?

11 (No response.)

12 NOSB VICE CHAIR JOHNSON: Thank you. Any
13 discussions or questions?

14 (No response.)

15 NOSB VICE CHAIR JOHNSON: Over to you, Amy.

16 NOSB CHAIR BRUCH: Thank you, Kathryn. Nicely
17 done. Thanks, Allison.

18 Motion to remove kaolin from the National List.
19 Motioned by Kathryn, seconded by Amanda. We'll start the
20 voting with Nate.

21 SECRETARY LEWIS: No.

22 NOSB CHAIR BRUCH: Cat.

23 BD. MEM. McCLUSKY: (No response.)

24 NOSB CHAIR BRUCH: Absent. Dilip.

25 BD. MEM. NANDWANI: No.

1 NOSB CHAIR BRUCH: Logan.
2 BD. MEM. PETREY LINKENHOGGER: (No response.)
3 NOSB CHAIR BRUCH: Absent. Corie.
4 BD. MEM. PIERCE: No.
5 NOSB CHAIR BRUCH: Franklin.
6 BD. MEM. QUARCOO: No.
7 NOSB CHAIR BRUCH: Kyla.
8 BD. MEM. SMITH: No.
9 NOSB CHAIR BRUCH: Javier.
10 BD. MEM. ZAMORA: (No response.)
11 NOSB CHAIR BRUCH: Absent. Brian.
12 BD. MEM. CALDWELL: No.
13 NOSB CHAIR BRUCH: Kathryn.
14 BD. MEM. DESCHENES: No.
15 NOSB CHAIR BRUCH: Carolyn.
16 BD. MEM. DIMITRI: No.
17 NOSB CHAIR BRUCH: Amanda.
18 BD. MEM. FELDER: No.
19 NOSB CHAIR BRUCH: Andrea.
20 BD. MEM. HATZIYANNIS: No.
21 NOSB CHAIR BRUCH: Allison.
22 NOSB VICE CHAIR JOHNSON: No.
23 NOSB CHAIR BRUCH: Chair votes no.
24 SECRETARY LEWIS: Zero yes, 12 no, zero
25 abstentions, zero recusals, three absent; the motion fails.

1 NOSB VICE CHAIR JOHNSON: Great. Thanks, Kathryn,
2 for leading on this.

3 Next, we're over to Kyla for the quintessential
4 simple material that turned out to be not so simple this
5 time, sodium bicarbonate.

6 NOSB CHAIR BRUCH: It faked you out.

7 BD. MEM. SMITH: Sodium bicarbonate, listed at
8 205.605(a)(26), also known as baking soda. It is used all
9 over the place in all sorts of things. It's also a common
10 compound in baking powder. It helps to regulate acidity for
11 things like tomato soup or pastas and beverages. It can be
12 used as an anticaking agent or as a stabilizer, helping to
13 maintain the appearance and consistency of foods. Sodium
14 bicarbonate is also used in pancakes, biscuits, muffins,
15 crackers, cookies, all the good things. And it's also used
16 in self-rising flour and confections, and also as a
17 neutralizer in cream and butter and ice cream. So all uses,
18 all products, all of the things.

19 We had requested TR. That TR was not finalized
20 prior to the posting of the spring materials. It is now on
21 the Petitioned Substances Database. It was posted over the
22 summer. We had the -- however, the Subcommittee had had the
23 TR in preparation of the spring meeting items, and so we had
24 indicated that there was some information in this new TR in
25 regards to the manufacturing process that indicated that

1 most commercially available forms are actually synthetic.
2 This is like one of those -- another one of those ones,
3 similar to sort of L-malic, where at the time of listing it
4 wasn't fully understood, the -- you know, the manufacturing
5 processes. And over the years, our depth of understanding
6 and evaluation of materials have -- has gotten more robust.
7 So we took another look through the TR and got more
8 information. The Handling Subcommittee did request an
9 additional Work Agenda item to reclassify sodium bicarbonate
10 as synthetic, and this will be a topic on the spring meeting
11 agenda.

12 As for public comments this round, for this
13 particular listing, I would say most, if not all, commenters
14 were in favor of relisting due to essentiality and general
15 compatibility with organic principles.

16 That's all I got.

17 NOSB VICE CHAIR JOHNSON: Thanks, Kyla. Your
18 eagle eyes really did a lot of important work on this one,
19 so thank you for that. And stay tuned for the spring
20 reclassification.

21 With that, any discussion or questions?

22 (No response.)

23 NOSB VICE CHAIR JOHNSON: Amy, vote us in.

24 NOSB CHAIR BRUCH: All right. There's a motion to
25 remove sodium bicarbonate from the National List. Motioned

1 by Kyla, seconded by Amanda. We'll start the voting with
2 Cat.

3 BD. MEM. McCLUSKY: (No response.)

4 NOSB CHAIR BRUCH: Absent. Dilip.

5 BD. MEM. NANDWANI: No.

6 NOSB CHAIR BRUCH: Logan.

7 BD. MEM. PETREY LINKENHOGGER: (No response.)

8 NOSB CHAIR BRUCH: Absent. Corie.

9 BD. MEM. PIERCE: No.

10 NOSB CHAIR BRUCH: Franklin.

11 BD. MEM. QUARCOO: No.

12 NOSB CHAIR BRUCH: Kyla.

13 BD. MEM. SMITH: No.

14 NOSB CHAIR BRUCH: Javier.

15 BD. MEM. ZAMORA: (No response.)

16 NOSB CHAIR BRUCH: Absent. Brian.

17 BD. MEM. CALDWELL: No.

18 NOSB CHAIR BRUCH: Kathryn.

19 BD. MEM. DESCHENES: No.

20 NOSB CHAIR BRUCH: Carolyn.

21 BD. MEM. DIMITRI: No.

22 NOSB CHAIR BRUCH: Amanda.

23 BD. MEM. FELDER: No.

24 NOSB CHAIR BRUCH: Andrea.

25 BD. MEM. HATZIYANNIS: No.

1 NOSB CHAIR BRUCH: Allison.

2 NOSB VICE CHAIR JOHNSON: No.

3 NOSB CHAIR BRUCH: Nate.

4 SECRETARY LEWIS: No.

5 NOSB CHAIR BRUCH: All right, Chair votes no.

6 SECRETARY LEWIS: Zero yes, 12 no, zero
7 abstentions, zero recusals, three absent; the motion fails.

8 BD. MEM. SMITH: We lost our slides. Oh, now
9 they're back.

10 NOSB VICE CHAIR JOHNSON: Thank you. It was nice
11 to see you all for a second. All right, thank you.

12 Moving right along to waxes - nonsynthetic (wood
13 rosin), and Kathryn is going to cover this for Logan.

14 BD. MEM. DESCHENES: So, wood rosin wax is
15 nonsynthetic, so these are used primarily as fruit waxes.
16 There were -- there was major support for relisting, but
17 some concerns that it's not always clear to consumers when
18 waxes have been applied to produce. So with that, there
19 were some concerns around labeling, and then additionally
20 some thinking that wood rosin should not be extracted with
21 volatile synthetic solvents. But across the written
22 comments there was support for relisting wood rosin,
23 emphasizing that it's essential for organic handling,
24 especially in the fruit waxing, and not a lot of viable
25 organic alternatives, meaning delisting would be disruptive.

1 So, given the consensus on the need and safety, I
2 think listing is well supported.

3 NOSB VICE CHAIR JOHNSON: Thanks, Kathryn. Very
4 concise. Brian.

5 BD. MEM. CALDWELL: Yeah, thanks, Kathryn.

6 BD. MEM. DESCHENES: Yeah.

7 BD. MEM. CALDWELL: Are there -- I'm not really
8 familiar with how this works, but are there other
9 synthetic -- or products available that may be a mix of wood
10 rosin plus some additives and things like that? I'm just
11 not -- again, I'm -- this is out of my league here, but --
12 even I grow fruit, but does that -- I always, sort of,
13 thought -- I was always suspicious, I guess, of waxed fruit,
14 thinking that there was probably something not good in
15 there, but I could be totally wrong.

16 BD. MEM. DESCHENES: I don't -- I am not familiar
17 if there are other materials that, you know, are mixed. I
18 know we also have carnauba wax on the list. And since I was
19 just jumping in here, I'm not as familiar, so I don't know
20 if others are?

21 Kyla.

22 BD. MEM. SMITH: I'm not -- I was going to just
23 say, I'm not necessarily familiar with waxes, but I would
24 just say that anything that is added in or on an organic
25 product would need to be on the National List, so this is

1 listed as a nonsynthetic allowed. So the Handling List is a
2 little bit different than Crops and Livestock, so all
3 nonsynthetics and synthetics need to be on 605 to be able to
4 be used in or on products that are handled -- you know,
5 processed or handled. And so any materials that are added,
6 either nonsynthetic or a synthetic, would need to be on the
7 National List.

8 I don't know if that helps.

9 NOSB VICE CHAIR JOHNSON: My recollection from my
10 handling certification days, things may have changed, but
11 there are a number of formulated citrus waxes that were OMRI
12 approved that had several ingredients in them.

13 Nate.

14 SECRETARY LEWIS: Yeah. And in this vein of
15 conversation, I'll note that the write up under the
16 Ancillary Substances sections indicates that there are no
17 ancillary substances that come along with wood rosin as a
18 wax. So it may be included in other things, like Allison's
19 explained, but there's no, sort of, unknown background
20 substances that come along with the wood rosin itself.

21 BD. MEM. CALDWELL: Great. Thanks, really
22 appreciate that.

23 NOSB VICE CHAIR JOHNSON: Yeah. And great to know
24 if you're buying organic citrus that there's a limited world
25 of things that might be on the outside of it. Who knows,

1 more conventional.

2 Any other discussion or questions?

3 (No response.)

4 NOSB VICE CHAIR JOHNSON: All right, let's vote.

5 NOSB CHAIR BRUCH: All right, thank you, Allison.

6 Thanks for the discussion, Kathryn. Thanks for your
7 teamwork here and leading this one.

8 There's a motion to remove wood rosin from the
9 National List. We will start -- let's see. It was motioned
10 by Logan, and seconded by Amanda. We will start our voting
11 with Dilip.

12 BD. MEM. NANDWANI: No.

13 NOSB CHAIR BRUCH: Logan.

14 BD. MEM. PETREY LINKENHOGGER: (No response.)

15 NOSB CHAIR BRUCH: Absent. Corie.

16 BD. MEM. PIERCE: No.

17 NOSB CHAIR BRUCH: Franklin.

18 BD. MEM. QUARCOO: No.

19 NOSB CHAIR BRUCH: Kyla.

20 BD. MEM. SMITH: No.

21 NOSB CHAIR BRUCH: Javier.

22 BD. MEM. ZAMORA: (No response.)

23 NOSB CHAIR BRUCH: Absent. Brian.

24 BD. MEM. CALDWELL: No.

25 NOSB CHAIR BRUCH: Kathryn.

1 BD. MEM. DESCHENES: No.
2 NOSB CHAIR BRUCH: Carolyn.
3 BD. MEM. DIMITRI: No.
4 NOSB CHAIR BRUCH: Amanda.
5 BD. MEM. FELDER: No.
6 NOSB CHAIR BRUCH: Andrea.
7 BD. MEM. HATZIYANNIS: No.
8 NOSB CHAIR BRUCH: Allison.
9 NOSB VICE CHAIR JOHNSON: No.
10 NOSB CHAIR BRUCH: Nate.
11 SECRETARY LEWIS: No.
12 NOSB CHAIR BRUCH: Cat.
13 BD. MEM. McCLUSKY: (No response.)
14 NOSB CHAIR BRUCH: Absent. The Chair votes no.
15 BD. MEM. SMITH: Zero yes, 12 no, zero
16 abstentions, zero recusals, three absent; the motion fails.
17 NOSB CHAIR BRUCH: Excellent. Allison, I'm just
18 going to jump in here. Let's plan on doing one more Sunset,
19 and then we'll take a break here.
20 NOSB VICE CHAIR JOHNSON: I was going to say the
21 same. And we're going to do --
22 NOSB CHAIR BRUCH: Okay.
23 NOSB VICE CHAIR JOHNSON: -- two together, but I
24 think that's fine. And Kathryn, thanks again for --
25 BD. MEM. DESCHENES: Yeah.

1 NOSB VICE CHAIR JOHNSON: -- covering that one for
2 Logan.

3 So the next two are ammonium bicarbonate and
4 ammonium carbonate, and Dilip will cover those. I think
5 he'll describe them together, and then we'll vote
6 separately.

7 NOSB CHAIR BRUCH: Excellent.

8 BD. MEM. NANDWANI: Okay, thanks, Amy. So you
9 already made my job easier, saying that I'm going to do
10 these two together because they are quite similar, ammonium
11 carbonate and ammonium bicarbonate, 205.605(b).

12 So they both are used as a leavening agent. And
13 primarily, they are both -- they are salts and composed of
14 ammonium and carbonate ions. Ammonium bicarbonate is the
15 monoammonium salt of carbonic acid, and ammonium carbonate
16 is the diammonium salt of carbonic acid.

17 So I will not go into their formula and molecular
18 weight because of the time, but I will say there are a
19 couple of other uses. They are being used as a raising or
20 leavening agent for flat baked goods, you know, cookies and
21 crackers. And they are also referred as Baker's Ammonia in
22 cooking recipes and by chefs.

23 What else? I'd like to say that there are no
24 organic alternatives to replace ammonium carbonates.

25 Discussion. We actually received 2025, late TR,

1 so I will mention one point in that TR that it says that it
2 has some toxic effect to some aquatic animals. Other than
3 the original TAP, combine the two ammonium carbonates, and
4 also, subsequently, they had been looked at together during
5 their previous two Sunset Reviews. Handling Subcommittee
6 found no concerns regarding the continued listing of
7 ammonium carbonate and bicarbonate. This material still
8 continues to satisfy all of the criteria, and public
9 comments confirm its current use and need. Public comments
10 also supported continued listing of ammonium carbonate and
11 bicarbonate on the National List. There were no comments
12 against its relisting, and the Subcommittee will take --
13 continue to list ammonium carbonate and bicarbonate on the
14 National List.

15 Thanks, Amy [sic]. That's all I have. Any
16 questions?

17 NOSB VICE CHAIR JOHNSON: Thanks, Dilip.

18 Any questions or discussion?

19 (No response.)

20 NOSB VICE CHAIR JOHNSON: All right, let's vote.

21 NOSB CHAIR BRUCH: Excellent. Two votes here,
22 guys. The first one, motion to remove ammonium bicarbonate
23 from the National List. Motioned by Dilip, seconded by
24 Andrea. We'll start the voting with Logan.

25 BD. MEM. PETREY LINKENHOGGER: (No response.)

1 NOSB CHAIR BRUCH: Absent. Corie.
2 BD. MEM. PIERCE: No.
3 NOSB CHAIR BRUCH: Franklin.
4 BD. MEM. QUARCOO: No.
5 NOSB CHAIR BRUCH: Kyla.
6 BD. MEM. SMITH: No.
7 NOSB CHAIR BRUCH: Javier.
8 BD. MEM. ZAMORA: (No response.)
9 NOSB CHAIR BRUCH: Absent. Brian.
10 BD. MEM. CALDWELL: No.
11 NOSB CHAIR BRUCH: Kathryn.
12 BD. MEM. DESCHENES: No.
13 NOSB CHAIR BRUCH: Carolyn.
14 BD. MEM. DIMITRI: No.
15 NOSB CHAIR BRUCH: Amanda.
16 BD. MEM. FELDER: No.
17 NOSB CHAIR BRUCH: Andrea.
18 BD. MEM. HATZIYANNIS: No.
19 NOSB CHAIR BRUCH: Allison.
20 NOSB VICE CHAIR JOHNSON: No.
21 NOSB CHAIR BRUCH: Nate.
22 SECRETARY LEWIS: No.
23 BD. MEM. McCLUSKY: Cat.
24 BD. MEM. McCLUSKY: (No response.)
25 NOSB CHAIR BRUCH: Absent. Dilip.

1 BD. MEM. NANDWANI: No.

2 NOSB CHAIR BRUCH: And the Chair votes No.

3 SECRETARY LEWIS: Zero yes, 12 no, zero
4 abstentions, zero recusal, three absent; the motion fails.

5 NOSB CHAIR BRUCH: Excellent. We'll move into our
6 second motion here. Motion to remove ammonium carbonate
7 from the National List. Motioned by Dilip, seconded by
8 Andrea. Voting starts with Corie.

9 BD. MEM. PIERCE: No.

10 NOSB CHAIR BRUCH: Franklin.

11 BD. MEM. QUARCOO: No.

12 NOSB CHAIR BRUCH: Kyla.

13 BD. MEM. SMITH: No.

14 NOSB CHAIR BRUCH: Javier.

15 BD. MEM. ZAMORA: (No response.)

16 NOSB CHAIR BRUCH: Absent. Brian.

17 BD. MEM. CALDWELL: No.

18 NOSB CHAIR BRUCH: Kathryn.

19 BD. MEM. DESCHENES: No.

20 NOSB CHAIR BRUCH: Carolyn.

21 BD. MEM. DIMITRI: No.

22 NOSB CHAIR BRUCH: Amanda.

23 BD. MEM. FELDER: No.

24 NOSB CHAIR BRUCH: Andrea.

25 BD. MEM. HATZIYANNIS: No.

1 NOSB CHAIR BRUCH: Allison.
2 NOSB VICE CHAIR JOHNSON: No.
3 NOSB CHAIR BRUCH: Nate.
4 SECRETARY LEWIS: No.
5 NOSB CHAIR BRUCH: Cat.
6 BD. MEM. McCLUSKY: (No response.)
7 NOSB CHAIR BRUCH: Absent. Dilip.
8 BD. MEM. NANDWANI: No.
9 NOSB CHAIR BRUCH: Logan.
10 BD. MEM. PETREY LINKENHOGGER: (No response.)
11 NOSB CHAIR BRUCH: Absent. And the Chair votes
12 no.
13 SECRETARY LEWIS: Zero yes, 12 no, zero
14 abstentions, zero recusals, three absent; the motion fails.
15 NOSB CHAIR BRUCH: Excellent. Thank you so much.
16 Thank you, Dilip. Really appreciate that.
17 We are going to take a short break. Let's return
18 at 12 past the hour and we'll continue on with our Handling
19 Subcommittee. Thank you.
20 (Whereupon, a brief recess was taken.)
21 NOSB CHAIR BRUCH: Welcome back, everybody. We're
22 here for our last segment. We are going to bypass
23 icebreakers, yet again, but hopefully we will be
24 implementing several tomorrow.
25 It does appear that we might have some carryover

1 items on the Handling list to be continued tomorrow. We are
2 going to do our best to promptly end at 5:00 p.m., Eastern.

3 So I'm going to turn it back over to Allison and I
4 will let you, kind of, manage the Handling schedule
5 accordingly so we can hit our deadline today. Thank you so
6 much.

7 NOSB VICE CHAIR JOHNSON: Sounds good. Thanks,
8 Amy.

9 All right, jumping right back in, next up are
10 calcium phosphates with Andrea.

11 BD. MEM. HATZIYANNIS: Thank you. All three
12 calcium phosphates, the monobasic, dibasic, and tribasic,
13 are up for review on the 205.605 list as non-agricultural
14 substances.

15 So they are compliant with the OFPA, and were all
16 unanimously relisted at the previous review in 2020. During
17 the Board Subcommittee we discussed the products, as well.
18 They have no viable organic substitute, particularly in
19 baked products, which is the main use of these products in
20 organic. Additionally, it's an alternative to sodium
21 phosphate.

22 We had several public comments in support of
23 relisting all three of these substances. But some also
24 requested an annotation to limit the type to monobasic only,
25 as seen in some reciprocal agreements.

1 Additional comments point to the new research that
2 indicates potential harm and human health impacts from the
3 cumulative effects of phosphates, which are added to
4 processed foods. And of particular concern is not just one
5 substance, like these phosphates, but all of the phosphate
6 containing compounds. So we will be looking to have that
7 reviewed at a later date as part of our research priorities
8 for the full effects of this.

9 So there was almost a unanimous vote coming out of
10 the Subcommittee to maintain this substance on the list and
11 to continue to support the baking industry by having this be
12 available for use as a leavening agent in their organic
13 products.

14 (Pause.)

15 BD. MEM. HATZIYANNIS: This was -- is -- are we
16 going to open this up for discussion with the rest of the
17 members of the Board?

18 NOSB VICE CHAIR JOHNSON: Yeah. All right, thank
19 you Andrea.

20 Go ahead Brian. And then Franklin.

21 BD. MEM. CALDWELL: Yeah, thanks, Andrea. I, as
22 a, you know, crop grower, I don't know why, I was just, kind
23 of, amazed that there were any -- any health issues with
24 phosphates, you know, human health issues. And can you
25 elaborate on those a little bit of what -- what the concerns

1 might be?

2 BD. MEM. HATZIYANNIS: Yes. The concern is a
3 bioaccumulation in the health system. And there are some
4 studies that point to it having adverse effects, but the
5 studies all had maybe -- need clarification on their amount
6 that is going to be causing the adverse effects. So I think
7 this is the point of which the research needs to be looked
8 at.

9 Kyla, I see you have your hand up.

10 BD. MEM. SMITH: Franklin's before me.

11 BD. MEM. HATZIYANNIS: Okay.

12 BD. MEM. QUARCOO: Andrea --

13 NOSB VICE CHAIR JOHNSON: Brian, did you get what
14 you're looking for there?

15 BD. MEM. CALDWELL: (No response.)

16 BD. MEM. QUARCOO: Andrea --

17 NOSB VICE CHAIR JOHNSON: Go ahead, Franklin.

18 BD. MEM. QUARCOO: Okay. Am I interrupting
19 somebody? Am I jumping the queue?

20 NOSB VICE CHAIR JOHNSON: No. Go ahead, Franklin.
21 Sorry.

22 BD. MEM. QUARCOO: Okay. Okay, so let me -- I
23 want to be very sure that I'm getting this right. In
24 order -- the publications that they currently have, are they
25 stating that in order to have the negative health effects,

1 you must have been exposed or bioaccumulated monobasic,
2 dibasic, and tribasic phosphates in order to have the health
3 effects?

4 BD. MEM. HATZIYANNIS: Thank you for the
5 clarifying question, Franklin. The studies are about the
6 cumulative effects of phosphate, and not these three
7 specific compounds, which is why we like to take that
8 research priority outside the discussion of these specific
9 compounds, and instead look at phosphate containing
10 compounds all together as one of the future research
11 priorities of this effect.

12 BD. MEM. QUARCOO: Okay. Thank you.

13 NOSB VICE CHAIR JOHNSON: Kyla, go ahead.

14 BD. MEM. SMITH: Yeah. I just wanted to point out
15 that this, along with cornstarch, is one of the items that
16 is also a sub ingredient in baking powder. So the impact of
17 removing this compound from the National List also impacts
18 baking powder in general.

19 NOSB VICE CHAIR JOHNSON: Thank you. Amy.

20 BD. MEM. DESCHENES: Yes, this is widely used in
21 baking substances, and we had -- it was one of the number
22 one reported items that was used in the list when the
23 auditors checked.

24 NOSB CHAIR BRUCH: Thank you, Andrea. Nicely done
25 here.

1 I just had a question. Not that we're necessarily
2 on any annotation work right now, but you had mentioned
3 public comments were potentially indicating a great use for
4 an annotation here to focus more on the monobasic.

5 What are -- what's, kind of, the sentiment of the
6 monobasic compared to the other forms?

7 BD. MEM. DESCHENES: It's that it's also found
8 only in this form in some of the reciprocating lists, and it
9 is more the simpler less processed form of this ingredient.

10 NOSB CHAIR BRUCH: Yes, I appreciate you elevating
11 the need for research priorities on this particular item,
12 and just, kind of, research priorities in general. Thank
13 you.

14 NOSB VICE CHAIR JOHNSON: Thank you. Any more
15 discussion or questions before we vote on this one?

16 (No response.)

17 NOSB VICE CHAIR JOHNSON: Go for the vote.

18 NOSB CHAIR BRUCH: Okay, we have a motion to remove
19 calcium phosphates from the National List. It was motioned by
20 Andrea, seconded by Amanda. We'll start our voting with Franklin.

21 BD. MEM. QUARCOO: Abstain.

22 NOSB CHAIR BRUCH: Kyla.

23 BD. MEM. SMITH: No.

24 NOSB CHAIR BRUCH: Javier.

25 BD. MEM. ZAMORA: (No response.)

1 NOSB CHAIR BRUCH: Absent. Brian.
2 BD. MEM. CALDWELL: Abstain.
3 NOSB CHAIR BRUCH: Kathryn.
4 BD. MEM. DESCHENES: No.
5 NOSB CHAIR BRUCH: Carolyn.
6 BD. MEM. DIMITRI: Yes.
7 NOSB CHAIR BRUCH: Amanda.
8 BD. MEM. FELDER: No.
9 NOSB CHAIR BRUCH: Andrea.
10 BD. MEM. HATZIYANNIS: No.
11 NOSB CHAIR BRUCH: Allison.
12 NOSB VICE CHAIR JOHNSON: No.
13 NOSB CHAIR BRUCH: Was that a "no"?
14 NOSB VICE CHAIR JOHNSON: No.
15 NOSB CHAIR BRUCH: Okay. Nate.
16 SECRETARY LEWIS: No.
17 NOSB CHAIR BRUCH: Cat.
18 BD. MEM. McCLUSKY: (No response.)
19 NOSB CHAIR BRUCH: Absent. Dilip.
20 BD. MEM. NANDWANI: No.
21 NOSB CHAIR BRUCH: Logan.
22 BD. MEM. PETREY LINKENHOGGER: (No response.)
23 NOSB CHAIR BRUCH: Absent. Corie.
24 BD. MEM. PIERCE: Abstain.
25 NOSB CHAIR BRUCH: Chair votes no.

1 SECRETARY LEWIS: Okay, we've got one yes, eight no,
2 three abstentions, zero recusals, three absent; the motion fails.

3 NOSB VICE CHAIR JOHNSON: Thank you. And apologies for
4 my clunky moderating on that one. Well done, Andrea.
5 Thank you.

6 Next up, we have low-acyl gellan gum with Kyla.

7 Oh, Brian, I see a hand. Is that --

8 BD. MEM. CALDWELL: well, just -- just to be clear on
9 that, so the two -- the majority that we need, two-thirds
10 majority, it sounds like maybe abstentions are not counted in
11 that? It doesn't have to be --

12 SECRETARY LEWIS: No.

13 BD. MEM. CALDWELL: -- the majority of everybody who
14 votes, but just of the non-abstaining votes?

15 SECRETARY LEWIS: Correct, yeah. Both absences and
16 abstentions change the total number of votes --

17 BD. MEM. CALDWELL: Okay.

18 SECRETARY LEWIS: -- that are necessary for a two-
19 thirds majority. Yeah, the recalculation occurs.

20 BD. MEM. CALDWELL: All right.

21 SECRETARY LEWIS: Yeah.

22 BD. MEM. CALDWELL: Thank you.

23 NOSB VICE CHAIR JOHNSON: And Carolyn, do you have
24 something?

25 BD. MEM. DIMITRI: Am I allowed to, like, ask a

1 question here? Or should I save that till later?

2 NOSB VICE CHAIR JOHNSON: Sure, it's a quick one.

3 BD. MEM. DIMITRI: I just wonder if, like, thinking
4 ahead, if it would be good to have, like, a diet -- like a
5 nutritionist or someone that understands phosphates, like, come
6 and speak to the Board so that there could be, like, more
7 knowledge base for this kind of assessment?

8 NOSB VICE CHAIR JOHNSON: Yeah. Or it could be a role
9 for a limited scope TR in the future to specifically look at that
10 question and the status of the literature. Thank you.

11 NOSB CHAIR BRUCH: Excellent. Andrea, if you don't
12 mind, kind of, including that in your write-up in the Sunset, so
13 that'll, kind of, stay with the Sunset. As well, that point by
14 Carolyn and Allison, it'll be helpful. Thank you.

15 BD. MEM. HATZIYANNIS: Yes.

16 NOSB VICE CHAIR JOHNSON: All right, Amy. Thank you.
17 Okay, Kyla, low-acyl gellan gum.

18 BD. MEM. SMITH: Yes. The low-acyl gellan gum is
19 listed at 205.605-B(b)(18) as an allowed synthetic. It is used as
20 a stabilizer and thickener and a gelling agent in gelatins,
21 fillings, jams, jellies, dairy, and alternative milk drinks or
22 kefir or yogurt, sour cream dressings, and other products. This
23 is the first Sunset Review for this material. It was added to the
24 National List in 2020 with a vote of 14 yes and one abstention.
25 Several comments were submitted in favor of relisting

1 due to essentiality, one of which stated, "The unique properties
2 of low-acyl gellan gum, such as its ability to create gels without
3 requiring high sugar content or high ionic concentrates --
4 concentrations are unmatched by other approved substances." Other
5 commenters were in favor of relisting, noting its lack of
6 environmental or human health concerns.

7 We received one comment in opposition due to
8 essentiality, noting that there are several other gums listed on
9 the National List. And then an additional comment raised some
10 concerns about manufacturers, sort of, dictating use of this
11 material due to equipment functionality, rather than making
12 equipment that would support a different material.

13 All in all, I would say, in general, commenters were
14 more in favor of support of relisting the material.

15 And then also just a procedural comment, maybe someone
16 at the Program can make note that this is the one gum that is not
17 reviewed in combination with all of the other gums. And I think
18 it just was like a timing issue of when it was added. So if we
19 can add this gum to the other suite of gums, which would mean this
20 gum would get reviewed a little bit early in its cycle, but I
21 think it makes sense to add it to the full suite of gum reviews.
22 That's not a word. Anyway, thanks. I'm done.

23 NOSB VICE CHAIR JOHNSON: Okay, thanks, Kyla. If I was
24 Nate, I would have, like, a witty thing to say about gums right
25 now, but I don't. Any discussion or questions?

1 SECRETARY LEWIS: I might have really gummed up the
2 words there.

3 NOSB VICE CHAIR JOHNSON: See. How do you do it?

4 NOSB CHAIR BRUCH: Love that.

5 NOSB VICE CHAIR JOHNSON: Yeah.

6 NOSB CHAIR BRUCH: Just one thing.

7 NOSB VICE CHAIR JOHNSON: Yeah, Amy.

8 NOSB CHAIR BRUCH: Kyla, that's a good point. There is
9 precedence; we've done that before in livestock, I believe with
10 tolazoline and xylazine, potentially, I believe. That was my
11 substance, and we got it on a different cadence. So note to
12 carryover board members, that sounds like a good idea. Thank you.

13 NOSB VICE CHAIR JOHNSON: Thank you.

14 Any discussion or questions.

15 (No response.)

16 NOSB VICE CHAIR JOHNSON: All right, we're ready for a
17 vote.

18 NOSB CHAIR BRUCH: Excellent. There's a motion to
19 remove low-acyl gellan gum from the National List. Motioned by
20 Kyla, seconded by Kathryn. We'll start voting back with Kyla.

21 BD. MEM. SMITH: No.

22 NOSB CHAIR BRUCH: Javier.

23 BD. MEM. ZAMORA: (No response.)

24 NOSB CHAIR BRUCH: Absent. Brian.

25 BD. MEM. CALDWELL: No.

1 NOSB CHAIR BRUCH: Kathryn.
2 BD. MEM. DESCHENES: No.
3 NOSB CHAIR BRUCH: Carolyn.
4 BD. MEM. DIMITRI: No.
5 NOSB CHAIR BRUCH: Amanda.
6 BD. MEM. FELDER: No.
7 NOSB CHAIR BRUCH: Andrea.
8 BD. MEM. HATZIYANNIS: No.
9 NOSB CHAIR BRUCH: Allison.
10 NOSB VICE CHAIR JOHNSON: No.
11 NOSB CHAIR BRUCH: Nate.
12 SECRETARY LEWIS: No.
13 NOSB CHAIR BRUCH: Cat.
14 BD. MEM. McCLUSKY: (No response.)
15 NOSB CHAIR BRUCH: Absent. Dilip.
16 BD. MEM. NANDWANI: No.
17 NOSB CHAIR BRUCH: Logan.
18 BD. MEM. PETREY LINKENHOGGER: (No response.)
19 NOSB CHAIR BRUCH: Absent. Corie.
20 BD. MEM. PIERCE: No.
21 NOSB CHAIR BRUCH: Franklin.
22 BD. MEM. QUARCOO: No.
23 NOSB CHAIR BRUCH: Chair votes no.
24 SECRETARY LEWIS: Zero yes, 12 no, zero abstentions,
25 zero recusal, three absent; the motion fails.

1 NOSB VICE CHAIR JOHNSON: Nate, thank you.

2 Next up is Ozone with Andrea.

3 BD. MEM. FELDER: That's me.

4 NOSB VICE CHAIR JOHNSON: Sorry, Amanda. My A's and
5 K's in -- I'm sorry.

6 BD. MEM. FELDER: I was going to say, we have a lot of
7 A's and K's.

8 NOSB VICE CHAIR JOHNSON: Yes. Amanda, please go
9 ahead. Thank you.

10 BD. MEM. FELDER: There you go.

11 All right, so ozone is a powerful oxidant. Its primary
12 use is in wash water, basically for fruit during post-harvest
13 handling as an antimicrobial treatment. It's also used as a broad
14 spectrum disinfectant for surfaces and a fumigant to reduce
15 microorganisms and meet food safety requirements.

16 So most public comment is in favor of relisting. Most
17 concerns circle around just worker exposure and health. You know,
18 we reviewed that as a subcommittee, and we looked through the
19 Technical Reviews and acknowledged the concerns. We noted that it
20 is something that is monitored very closely with environmental
21 agencies and uses and so when it's properly maintained and
22 managed, that the risk is minimal to exposure for workers.

23 So yeah, the Subcommittee recommends to not remove
24 Ozone from the National List. And happy to open it up for
25 discussion or questions.

1 NOSB VICE CHAIR JOHNSON: Great. Thanks, Amanda. Any
2 questions or discussion?

3 (No response.)

4 NOSB CHAIR BRUCH: All right, not seeing any, there's a
5 motion to remove ozone from the National List. Motioned by
6 Amanda, seconded by Dilip. We will start the voting with Javier.

7 BD. MEM. ZAMORA: (No response.)

8 NOSB CHAIR BRUCH: Absent. Brian.

9 BD. MEM. CALDWELL: No.

10 NOSB CHAIR BRUCH: Kathryn.

11 BD. MEM. DESCHENES: No.

12 NOSB CHAIR BRUCH: Carolyn.

13 BD. MEM. DIMITRI: No.

14 NOSB CHAIR BRUCH: Amanda.

15 BD. MEM. FELDER: No.

16 NOSB CHAIR BRUCH: Andrea.

17 BD. MEM. HATZIYANNIS: No.

18 NOSB CHAIR BRUCH: Allison.

19 NOSB VICE CHAIR JOHNSON: No.

20 NOSB CHAIR BRUCH: Nate.

21 SECRETARY LEWIS: No.

22 NOSB CHAIR BRUCH: Cat.

23 BD. MEM. McCLUSKY: (No response.)

24 NOSB CHAIR BRUCH: Absent. Dilip.

25 BD. MEM. NANDWANI: No.

1 NOSB CHAIR BRUCH: Logan.

2 BD. MEM. PETREY LINKENHOGGER: (No response.)

3 NOSB CHAIR BRUCH: Absent. Corie.

4 BD. MEM. PIERCE: No.

5 BD. MEM. NANDWANI: Franklin.

6 BD. MEM. QUARCOO: No.

7 NOSB CHAIR BRUCH: Kyla.

8 BD. MEM. SMITH: No.

9 NOSB CHAIR BRUCH: And the Chair votes no.

10 SECRETARY LEWIS: Zero yes, 12 no, zero abstentions,
11 zero recusals, three absent; the motion fails.

12 NOSB VICE CHAIR JOHNSON: All right, thank you.

13 Sticking with Amanda, our last 605 material, sodium
14 hydroxide.

15 BD. MEM. FELDER: All right, so this is used in
16 processing handling, mostly for pretzel manufacturing. It creates
17 a lovely sheen and flavor. It's also used as a processing aid in
18 cocoa manufacturing, and it removes the bitterness from olives.
19 And it's also a processing aid in soaps and body care products.
20 There are no viable alternatives to this. Public comment was
21 mostly in favor of relisting. Don't have any notes for any major
22 concerns. So I will open it up for questions and comments.

23 NOSB VICE CHAIR JOHNSON: Thanks, Amanda. Short and
24 sweet, although it's not fair to talk about pretzels and olives at
25 this time of the meeting.

1 Any questions or discussion?

2 (No response.)

3 NOSB VICE CHAIR JOHNSON: Okay, let's vote.

4 NOSB CHAIR BRUCH: Excellent. Nicely done, Amanda.

5 We'll -- the motion to remove sodium hydroxide from the
6 National List was motioned by Amanda, seconded by Kathryn. We'll
7 start the voting with Brian.

8 BD. MEM. CALDWELL: No.

9 NOSB CHAIR BRUCH: Kathryn.

10 BD. MEM. DESCHENES: No.

11 NOSB CHAIR BRUCH: Carolyn.

12 BD. MEM. DIMITRI: (No response.)

13 NOSB CHAIR BRUCH: Carolyn?

14 BD. MEM. DIMITRI: Yeah, I thought I -- I said no very
15 quietly.

16 NOSB CHAIR BRUCH: Oh, sorry. Yeah, gotcha. Thank
17 you.

18 Amanda.

19 BD. MEM. FELDER: No.

20 NOSB CHAIR BRUCH: Andrea.

21 BD. MEM. HATZIYANNIS: No.

22 NOSB CHAIR BRUCH: Allison.

23 NOSB VICE CHAIR JOHNSON: No.

24 NOSB CHAIR BRUCH: Nate.

25 SECRETARY LEWIS: No.

1 NOSB CHAIR BRUCH: Cat.
2 BD. MEM. McCLUSKY: (No response.)
3 NOSB CHAIR BRUCH: Absent. Dilip.
4 BD. MEM. NANDWANI: No.
5 NOSB CHAIR BRUCH: Logan.
6 BD. MEM. PETREY LINKENHOGGER: (No response.)
7 NOSB CHAIR BRUCH: Absent. Corie.
8 BD. MEM. PIERCE: No.
9 NOSB CHAIR BRUCH: Franklin.
10 BD. MEM. QUARCOO: No.
11 NOSB CHAIR BRUCH: Kyla.
12 BD. MEM. SMITH: No.
13 NOSB CHAIR BRUCH: Javier.
14 BD. MEM. ZAMORA: (No response.)
15 NOSB CHAIR BRUCH: Absent.
16 NOSB CHAIR BRUCH: And the Chair votes no.
17 SECRETARY LEWIS: Zero yes, 12 no, zero abstentions,
18 zero refusal, three absent; the motion fails.
19 NOSB VICE CHAIR JOHNSON: Great. Thank you all.
20 Nicely done to our new members with your first voting 605
21 materials. Excellent work all around.
22 We're going to transition now to the 606 materials, and
23 I'm just going to ground us for the discussion in the definition
24 of commercial availability in the NOP regs. "The ability to
25 obtain a production input in an appropriate form, quality, or

1 quantity to fulfill an essential function in a system of organic
2 production or handling as determined by the certifying agent in
3 the course of reviewing the organic system plan." So "must be
4 essential, form, quality, or quantity" are issues that might make
5 it challenging to acquire the organic version, and cost is not a
6 permissible factor. So I think we're going to have some robust
7 discussion in these materials. We'll see how far we get today,
8 and we'll pick the rest up tomorrow.

9 And with that, I will hand it over to carnauba wax
10 [sic], and Kathryn's going to cover this one for Logan, as well.

11 BD. MEM. DESCHENES: Perfect. So Carnauba wax listed
12 at 205.606(a). Carnauba wax is primarily used as a coating for
13 fresh fruit, but also can be in candy coatings or the base for
14 chewing gum. It's also used as a releasing agent in
15 manufacturing.

16 Some comments noted that there are 19 listings in OID
17 of carnauba wax as organic, so questioning the limited
18 availability of this substance. But I will note that this was
19 originally on 205.605. It moved to 606 in 2019 with a Final Rule
20 effective January 20, 2019. And there were some commenters that
21 noted this is an essential tool in their toolbox for fruit quality
22 and also to reduce food waste for fresh fruits. But also, I
23 think, like, next time we should -- there were -- there was
24 limited question -- or limited comments on the availability of the
25 organic, and some saying that it wasn't available in the quality,

1 quantity, or form. But not too many comments there, so I would
2 support relisting.

3 Questions?

4 NOSB VICE CHAIR JOHNSON: Thanks, Kathryn. Nate, and
5 then Brian.

6 SECRETARY LEWIS: Yeah, I think maybe just more a
7 comment that with carnauba wax moving from 605 to 606, we now have
8 a commercial availability requirement applied to it for all
9 handlers choosing to use a non-organic version in their formulas,
10 right? Correct? Am I -- have I got that one right?

11 BD. MEM. DESCHENES: Repeat. So, yeah, they would have
12 to answer though annually, right, to prove commercial
13 availability.

14 SECRETARY LEWIS: Yeah.

15 BD. MEM. DESCHENES: So, I think we're moving right --
16 in the right direction because that question has to be asked. So,
17 I guess, like, since it's more recently moved to 606, you know,
18 I -- I'm not sure. "Are we still building that supply?" was, sort
19 of, the question in my mind.

20 SECRETARY LEWIS: Okay. But at least there's -- at
21 least that commercial availability applies in this situation when
22 it --

23 BD. MEM. DESCHENES: Correct.

24 SECRETARY LEWIS: -- did not apply. That -- yeah --
25 great.

1 BD. MEM. DESCHENES: Yes.

2 Brian.

3 BD. MEM. CALDWELL: Just a -- sort of, a question out
4 of ignorance, but what is -- is there like a carnauba plant?
5 Where does it come from? What is this?

6 BD. MEM. DESCHENES: Carnauba wax is -- it comes from a
7 plant. But, I am -- I'm trying to pull up exactly what the --

8 UNIDENTIFIED SPEAKER: (Indiscernible) --

9 BD. MEM. DESCHENES: -- carnauba plant.

10 UNIDENTIFIED SPEAKER: Thank you.

11 BD. MEM. CALDWELL: Okay, great. So I was just, you
12 know, essentially wondering if this could be geared up quickly?
13 If it was, like, easy to, like, increase the organic supply of
14 Carnauba or not? But the palm tree, probably not.

15 (Court reporter audio malfunction.)

16 BD. MEM. CALDWELL: So, I guess the --

17 Thank you, Michelle.

18 What I was trying to get at there was just whether if
19 it was an easy plant to increase the organic supply or not, but if
20 it's a palm tree, probably it's not very easy to increase the
21 supply.

22 BD. MEM. DESCHENES: The last TR also notes that it's
23 grown almost exclusively in northeastern Brazil. So, you know,
24 maybe there's limited supply for that reason, as well.

25 BD. MEM. CALDWELL: Thanks. And I apologize for being

1 ignorant about it.

2 BD. MEM. DESCHENES: No. I -- no problem there, Brian.
3 I don't know much about carnauba trees, either.

4 NOSB VICE CHAIR JOHNSON: Yeah, good question, Brian,
5 and maybe some, like, competing land use issues with such a narrow
6 area where it's being produced.

7 Carolyn, and then Amy.

8 BD. MEM. DIMITRI: This is, sort of, like Brian's
9 question, like, how important is this wax? Like, is it the one
10 that's used most often? Like, and what are the other products
11 that are substitutes for it?

12 BD. MEM. DESCHENES: Yeah, it looks like, you know,
13 beeswax, other waxes could be used in place. I think this is
14 more -- more effective as a fruit coating for specific fruits than
15 some of the other waxes.

16 Amy.

17 NOSB CHAIR BRUCH: Excellent. Nicely done, Kathryn.
18 Thank you for stepping in here and getting up to speed very
19 quickly on this substance.

20 I was just going to mention, you know, just the
21 challenge for growing things in Brazil in this
22 subtropical/tropical area. I think it's going to be really
23 challenging if that's, kind of, the base origin of the majority of
24 this -- where this product can grow. It's going to be hard to,
25 kind of, expand into the organic scenario with their climate

1 there. There's a lot of sugarcane in that area too, very old
2 growing region in the northeast of Brazil.

3 NOSB VICE CHAIR JOHNSON: Thanks, Amy. Kyla.

4 BD. MEM. SMITH: Just with alternatives, Carolyn, so we
5 talked about wood rosin earlier, that's one item that we reviewed.
6 We're going to talk about orange shellac later, which is my
7 material, which is another fruit coating. And one of the
8 commenters when -- in -- for the orange shellac conversation had
9 indicated that they felt it was important to have -- be able to
10 rotate to, like, different substances to be able to coat fruits
11 for -- anyway. So to have, you know, options and tools in the
12 toolbox, because they do rotate.

13 NOSB VICE CHAIR JOHNSON: Thanks, Kyla. Carolyn.

14 BD. MEM. DIMITRI: I'm -- do you remember in the gums,
15 we had that big table of, like, here are the gums, and here (audio
16 drop) maybe when the next TR is done, they could make something
17 like that for the waxes, so then you could -- I don't know, it
18 just gives more information for us to understand or the future us
19 to understand how these products are used.

20 BD. MEM. DESCHENES: Yeah. Within the TR, the last TR,
21 there is, like, a chart of different waxes. I just pulled it up.
22 So the natural waxes: wood rosin, beeswax, wax, carnauba wax, and
23 berry wax. But, like, as far as what they're effective for, you
24 know, which fruits are -- they're more effective on certain
25 fruits, that I don't have as much knowledge on.

1 NOSB VICE CHAIR JOHNSON: Yeah, thank you. It is hard
2 when you have essentiality as one of the criteria to think about.
3 You know, if you have three options, are all of them essential,
4 and how to weigh them against each other.

5 Nate.

6 SECRETARY LEWIS: Yeah, just to put a finer point on
7 what Kyla was alluding to around, sort of, the rotation of the
8 waxes. From my understanding, particularly in the pome fruit
9 industry, apples and pears in the Pacific Northwest, that, you
10 know, they're packing fruit from almost -- at this point, almost
11 365 days a year because of long-term storage capacity, and those
12 fruits, the qualities of the skin and the -- what's inside changes
13 across that storage life, and they're being more prone to scuffing
14 changes, the loss of moisture changes, and so they use these
15 different waxes sparingly and on occasion, and in order to address
16 very specific characteristics of the fruit, which they can't
17 always anticipate. So it's a similar concept to, like, the
18 rotation around, like, sanitizers, for example, but it's to
19 address very distinct characteristics of the fruit as they go
20 through their storage life in the controlled atmosphere room.

21 So hopefully that helps provide some context for, like,
22 why we would need a number of waxes to address the various
23 concerns, and why one might not be appropriate in various
24 circumstances.

25 NOSB VICE CHAIR JOHNSON: Learn something here every

1 time. Thank you, Nate.

2 Okay, any more questions or discussion?

3 (No response.)

4 NOSB VICE CHAIR JOHNSON: I think we're ready for the
5 vote on this one.

6 NOSB CHAIR BRUCH: Excellent. There's a motion to
7 renew -- motion to remove carnauba wax from the National List.
8 Motioned by Logan, seconded by Andrea. We'll start the voting
9 with Kathryn.

10 BD. MEM. DESCHENES: No.

11 NOSB CHAIR BRUCH: Carolyn.

12 BD. MEM. DIMITRI: No.

13 NOSB CHAIR BRUCH: Amanda.

14 BD. MEM. FELDER: No.

15 NOSB CHAIR BRUCH: Andrea.

16 BD. MEM. HATZIYANNIS: No.

17 NOSB CHAIR BRUCH: Allison.

18 NOSB VICE CHAIR JOHNSON: No.

19 NOSB CHAIR BRUCH: Nate.

20 SECRETARY LEWIS: No.

21 NOSB CHAIR BRUCH: Cat.

22 BD. MEM. McCLUSKY: (No response.)

23 NOSB CHAIR BRUCH: Absent. Dilip.

24 BD. MEM. NANDWANI: No.

25 NOSB CHAIR BRUCH: Logan.

1 BD. MEM. PETREY LINKENHOGGER: (No response.)
2 NOSB CHAIR BRUCH: Absent. Corie.
3 BD. MEM. PIERCE: Abstain.
4 NOSB CHAIR BRUCH: Franklin.
5 BD. MEM. QUARCOO: No.
6 NOSB CHAIR BRUCH: Kyla.
7 BD. MEM. SMITH: No.
8 NOSB CHAIR BRUCH: Javier.
9 BD. MEM. ZAMORA: (No response.)
10 NOSB CHAIR BRUCH: Absent. Brian.
11 BD. MEM. CALDWELL: No.
12 NOSB CHAIR BRUCH: And the Chair votes no.
13 SECRETARY LEWIS: Zero yes, 11 no, one abstention, zero
14 recusals, three absent; the motion fails.
15 NOSB VICE CHAIR JOHNSON: Great. Thank you, Kathryn,
16 for jumping in on that one and the good questions and discussion.
17 We have about 15 minutes left. Colors are up next, but
18 that is 10 separate votes, plus discussion, so I think I'm going
19 to tuck colors away for tomorrow and move us on to cornstarch if
20 you're up for that, Carolyn? Sorry to put you on the spot.
21 BD. MEM. DIMITRI: That's okay. I have all my notes
22 right here. I just had to flip through all of the pages.
23 Okay, so cornstarch, I would say it's too many uses.
24 Or, like, it's a thickener, it's, like, something to, like, line
25 the molds of your gummy bears to help them pop out so that, you

1 know, they're all intact and you like to eat them. So in general,
2 this is one of the products, I'll just say up front, I think
3 there's a lot of support for removing this from the National List.

4 And here are the main arguments that people gave. And
5 so one is that there is actually an ample supply of organic
6 cornstarch, and it's the right quality and there's the right
7 quantity. A minority of commenters raised concern about baking
8 powder, which as Kyla mentioned earlier, has cornstarch as an
9 ingredient. And indeed, a few commenters used this as a reason to
10 say this should not be removed from the list. However, other
11 commenters anticipated that people would make this comment using
12 baking powder as a reason to keep cornstarch on the list, and
13 argue that that's actually not a legitimate obstacle, that the
14 baking powder could be made with the organic supply of cornstarch,
15 and that there would be ample time for the industry to make
16 changes, and that possibly there could be an annotation where it's
17 allowed to be used for baking powder, which I think -- I think the
18 NOP can do if, you know, when they're making a change to the
19 National List.

20 And then another commenter suggested that, you know,
21 there are other starches that can substitute for cornstarch, not
22 for baking powder but for the other uses, and those are like pea,
23 potato, and tapioca starches, and that there is plenty supply of
24 that also, so it would also expand opportunities for other organic
25 producers.

1 So okay, that's, kind of, what I have to say on it, and
2 I will open the floor for comments.

3 NOSB VICE CHAIR JOHNSON: Carolyn?

4 BD. MEM. DIMITRI: Questions, yeah.

5 NOSB VICE CHAIR JOHNSON: Discussion questions?

6 BD. MEM. SMITH: I'm sorry, I didn't even realize I was
7 unmuted, so glad I didn't, like, say something embarrassing.

8 Anyway, I just wanted to talk a little bit about the
9 baking powder situation. So if I'm understanding this correctly,
10 if we remove cornstarch from 606, then organic cornstarch would be
11 required to be used as an ingredient in baking powder. My concern
12 is that because of the composition requirements, the baking powder
13 itself would not likely be eligible to be organic or made with
14 organic. It would have to be in the less than 70 percent claim,
15 which may not make it a viable business opportunity, I guess. I
16 guess that's my concern, is like, is it worth it economically for
17 those producers to use that? And I mean, they would be forced to,
18 I guess, if -- anyway, that ingredient would then continue to be
19 used.

20 The other thing I'll point out is that there's a little
21 bit of a lack of consistency or clarity around certifiers around
22 the handling of organic ingredients by non-organic operations. So
23 if an input manufacturer is handling an organic ingredient, it,
24 like, loses its organicness, essentially, and so that would --
25 could create some problems for use of baking powder by organic

1 producers.

2 NOSB VICE CHAIR JOHNSON: Thanks, Kyla. I have a few
3 thoughts on that, but we'll let Amy go first.

4 NOSB CHAIR BRUCH: Actually, how about this, Allison.
5 I got a follow-up for Kyla, then I'll divert to you, and then I'll
6 do my normal question.

7 Kyla, just a quick unpackaging of the label claim.
8 It's a world I don't live in too much. When you said the 70
9 percent, is that based on the volume of the ingredients or the
10 number of ingredients declared?

11 BD. MEM. SMITH: Percentage of volume. So --

12 NOSB CHAIR BRUCH: Volume, okay.

13 BD. MEM. SMITH: Yeah. Percentage.

14 NOSB CHAIR BRUCH: So you mentioned there could be a
15 risk. I'm just thinking on my normal Amy-in-the-kitchen type
16 experiments, my usage is very low of, like, the sodium bicarbonate
17 or baking soda or whatever. You know, you're using just a small
18 fractional amount.

19 BD. MEM. SMITH: Well, it would be the corn starch
20 percentage in the baking powder.

21 NOSB CHAIR BRUCH: Okay.

22 BD. MEM. SMITH: So the baking powder --

23 NOSB CHAIR BRUCH: Got it.

24 BD. MEM. SMITH: -- itself would likely not be eligible
25 to be certified as organic or made with organic because the amount

1 of the corn starch in there.

2 NOSB CHAIR BRUCH: Got it. Sorry, I was aggregating
3 further downstream. Go ahead.

4 NOSB VICE CHAIR JOHNSON: That was the point I'm going
5 to add on to. So when I was working in certification, we had at
6 least one, maybe several, clients who requested certification of
7 products that had less than 70 percent organic exactly for this
8 reason, so that they could be used as an ingredient in a
9 subsequent organic product. So I think there is precedent for
10 certifying the handling process for those products that don't meet
11 the 70 percent threshold. Or there's a way to do it from a
12 certification point of view.

13 And I think, Kyla, like, my reaction is, kind of, the
14 opposite of yours. If I were a baking powder manufacturer and I
15 had a chance to be the baking powder that every single organic
16 operation that is baking had to use, I would jump at the chance to
17 figure out how to get that organic corn starch into my product
18 ASAP and start marketing it. So I think this is the case where,
19 like, you draw the line and the market will figure out a way to
20 deal with it. I'm not terribly concerned.

21 BD. MEM. SMITH: I also -- so sorry, I'm, like, jumping
22 in, but not all certifiers certify to the 70 percent labeling
23 claim. PCO doesn't. So whether or not we could, that's something
24 to explore. I want to say from memory, I'm going from memory,
25 that that was because at some point in time along the road here

1 that certifiers were told not to. But I know some certifiers do
2 and some certifiers don't. So there's inconsistency there.

3 And yeah, anyway.

4 NOSB VICE CHAIR JOHNSON: Helpful. Thank you.

5 Okay, Amy and then Amanda. Unless --

6 NOSB CHAIR BRUCH: Actually --

7 NOSB VICE CHAIR JOHNSON: -- Amanda is still on this
8 point?

9 NOSB CHAIR BRUCH: Yeah, go to Amanda first, please.
10 Thank you.

11 BD. MEM. FELDER: Yeah, so I actually have a lot of
12 experience in this less than 70 percent certified product, which
13 is very complicated. And from my experience, I found two
14 certifiers that certify that has less than 70 percent. It is
15 doable. It does -- Kyla brings a lot that I didn't consider
16 removing this with baking powder being impacted. But I have seen
17 a baking powder product in the past that contains organic corn
18 starch. And so because it's less than 70 percent organic
19 ingredients, and it's not because -- like, all the agricultural
20 part would be organic, it's just the baking soda and the other
21 acid, like usually cream of tartar or whatever, would be not --
22 would be synthetic. And so it's not by fault of the agricultural
23 component that's not organic. And so they can only make the claim
24 in the ingredient statement. So they can't say it's organic
25 baking powder. They can't say baking powder with organic

1 cornstarch. They can't call out those because those are made with
2 claim and they can't use the USDA organic logo. So it makes it a
3 little harder to market, but it would be under -- and maybe this
4 changes that, of saying, hey, these are things that contain
5 organic ingredients. And now this opens up a new, kind of,
6 market-ish of that type of thing, which then maybe more certifiers
7 do it.

8 I don't know the rationale as to why only two
9 certifiers do this that I'm aware of, but they are big national
10 certifiers. It's not a small certifier that does it. I had to
11 pursue this for a different ingredient that was on 606, where the
12 same, if you're not -- so if you're a baking powder company,
13 you're not certified organic because you don't handle anything
14 organic, as soon as you take into your possession organic
15 cornstarch now, whatever, it's not organic anymore unless you're
16 certified.

17 So it's not impossible to do once it's known how to
18 solve the issue. It is. And it's one of those things where a
19 certifier said, hey, your processing aid can't be used because
20 it's not certified. And then I went down this rabbit hole of
21 figuring all of this stuff out. So congratulations, public. You
22 just learned all of my two years of research. So it is doable.
23 It's just it's not easy. But I think -- I think it's -- until we
24 make it more common, you know, I think this is a good pathway
25 together. And I think it's doable.

1 NOSB VICE CHAIR JOHNSON: Thank you, Amanda. So just
2 to -- just, kind of, summarize on baking powder, there are some
3 logistical complications that would need to be worked out, talked
4 through, most likely at the Program level if this were to come off
5 the list. But it sounds like those barriers are likely not
6 insurmountable.

7 With five minutes left, I want to make sure we have two
8 minutes at least to vote. So maybe two more minutes of
9 discussion. I see Amy, and Nate, and then if we have time, come
10 back to you, Kyla. Or did you have like a closing remark there?

11 BD. MEM. SMITH: (Nods negative.)

12 NOSB VICE CHAIR JOHNSON: Okay, Amy.

13 NOSB CHAIR BRUCH: Okay, I'm just going to ask, Nate,
14 do you have something related to the current discussion? I just
15 have an outside comment from a producer standpoint.

16 SECRETARY LEWIS: Yeah. I just want to make sure I'm
17 understanding the dilemma here a little bit more concretely. If
18 cornstarch is removed from 606, all of the baking powder used in
19 organic products must be a certified product? Certified organic
20 ingredient? There would be no allowance for a baking powder that
21 simply listed organic cornstarch in the ingredient statement as an
22 exempt product because that's not a certified label category?

23 BD. MEM. FELDER: Yes, because they're making it --
24 because they're mixing it together, it would require it. If they
25 were just grow granite type of a thing, as is, then you're not

1 really handling it the same way. But so as soon as it's in their
2 possession and they've changed it, now they have to be certified
3 as a handler.

4 SECRETARY LEWIS: Yeah. I'm using a --

5 BD. MEM. FELDER: So --

6 SECRETARY LEWIS: I make organic cookies and baking
7 powder is one of those ingredients. If this comes off the list, I
8 now must find a certified organic baking powder? Unless --

9 BD. MEM. FELDER: It can't be certified organic because
10 it's less than 70 percent organic ingredients. But that you would
11 still get an organic certificate from the baking powder company
12 that lists it. So on a certificate on your product profile, it'll
13 say 100 percent organic, made with, and then there's contains
14 organic ingredients. And so it'll be that fourth category of
15 contains organic ingredients. So it's not stating that the
16 product is, but we -- the certifier would say we have blessed
17 this. We verified it. This -- they have a process to not
18 contaminate it. It's mass balanced out. They didn't bring it in.
19 So they're checking all of those things as from -- to make sure
20 that organic piece stays organic for the integrity of it.

21 NOSB VICE CHAIR JOHNSON: I was thinking there may be
22 some squirrely way around, you know, incidental ingredients and
23 allow materials or someone could petition baking powder for the
24 list. There may be some other solution out there, but yes, if all
25 the cornstarch must be organic, then it must be handled throughout

1 the supply chain by a certified organic handler and part of the
2 OSP.

3 Okay, Amy.

4 NOSB CHAIR BRUCH: Okay, quick, quick, just comment.
5 There was a statement about expanded opportunities for markets,
6 and I just wanted to highlight that there's a strong confidence in
7 producers and growing organic corn. We love to do it. And so I
8 know that's the base material for this. So I have a lot of
9 confidence with the growers in the Heartland that they would love
10 for this to be the case. Thank you.

11 NOSB VICE CHAIR JOHNSON: Thanks. Carolyn, you want
12 the last word?

13 BD. MEM. DIMITRI: I would like the last word, because
14 remember, we're voting on cornstarch, and if it's an input to
15 baking powder, I think the Program will have to deal with that as
16 it goes through rulemaking. So I don't think we should get
17 tripped up on baking powder at this point in time.

18 NOSB VICE CHAIR JOHNSON: Thank you. Yeah, another way
19 to think about that is, is non-organic cornstarch essential to
20 baking powder? Probably not, because there are products on the
21 market already it sounds like.

22 All right, ready for a rapid fire vote and then a pin
23 in the rest of the Handling for tomorrow.

24 NOSB CHAIR BRUCH: Excellent. Fantastic discussion,
25 team.

1 All right, there's a motion to remove cornstarch from
2 the National List. Motioned by Carolyn, seconded by Dilip. We'll
3 start with Carolyn.

4 BD. MEM. DIMITRI: Yes.

5 NOSB CHAIR BRUCH: Amanda.

6 BD. MEM. FELDER: Yes.

7 NOSB CHAIR BRUCH: Andrea.

8 BD. MEM. HATZIYANNIS: Yes.

9 NOSB CHAIR BRUCH: Allison.

10 NOSB VICE CHAIR JOHNSON: Yes.

11 NOSB CHAIR BRUCH: Nate.

12 SECRETARY LEWIS: No.

13 NOSB CHAIR BRUCH: Cat.

14 BD. MEM. McCLUSKY: (No response.)

15 NOSB CHAIR BRUCH: Absent. Dilip.

16 BD. MEM. NANDWANI: Yes.

17 NOSB CHAIR BRUCH: Logan.

18 BD. MEM. PETREY LINKENHOGGER: (No response.)

19 NOSB CHAIR BRUCH: Absent. Corie.

20 BD. MEM. PIERCE: Abstain.

21 NOSB CHAIR BRUCH: Franklin.

22 BD. MEM. QUARCOO: Abstain.

23 NOSB CHAIR BRUCH: Kyla.

24 BD. MEM. SMITH: No.

25 NOSB CHAIR BRUCH: Javier.

1 BD. MEM. ZAMORA: (No response.)

2 NOSB CHAIR BRUCH: Absent. Brian.

3 BD. MEM. CALDWELL: Yes.

4 NOSB CHAIR BRUCH: Kathryn.

5 BD. MEM. DESCHENES: No.

6 NOSB CHAIR BRUCH: Chair votes yes.

7 SECRETARY LEWIS: Oh, this is tough.

8 NOSB VICE CHAIR JOHNSON: You have to do the hard math
9 at the end of the day.

10 SECRETARY LEWIS: Actually, I'll do the tally here. So
11 we've got seven yes, three no, two abstentions, zero recusals,
12 three absent; so seven out of 10 is a more than two-thirds
13 majority, so the motion passes.

14 NOSB VICE CHAIR JOHNSON: Good work, Mr. Secretary.

15 NOSB CHAIR BRUCH: Okay.

16 NOSB VICE CHAIR JOHNSON: Thank you.

17 SECRETARY LEWIS: Full contact secretary-ing there.

18 NOSB VICE CHAIR JOHNSON: Well, thank you all. That
19 was a great discussion. Back over to you, Amy, to close this up
20 until tomorrow.

21 NOSB CHAIR BRUCH: Yeah, excellent. Thank you so much,
22 everybody. We breathed a lot of life into the minutes that we had
23 together. Looking forward to continuing on tomorrow. We're going
24 to be in recess. We're at the top of the hour. We will, as
25 Allison mentioned, continue on with Handling. And then we'll roll

1 into the remainder of our Work Agenda, including Livestock, CACS,
2 and Materials. And then we'll have Final Business.

3 Thank you so much for joining us here today. See you
4 all tomorrow. Bye, everyone.

5 (Whereupon, at 5:00 p.m., the meeting in the above-entitled
6 meeting was adjourned until Wednesday, January 14, 2026 at
7 11:00 a.m., Eastern Standard Time.)

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CERTIFICATION

This is to certify that the attached proceeding before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2025 NOSB BOARD MEETING -

RESCHEDULED - Day 1

PLACE: Zoom for Government

DATE: January 13, 2026

was held according to the record, and that this is the original, complete, true and accurate transcript which has been compared to the recording accomplished at the hearing.



Elaine M. LaRosee, CDLR
Official Reporter

**NATIONAL ORGANIC STANDARDS BOARD (NOSB)
FALL 2025 BOARD MEETING - DAY 1**
**- Vol. 1
January 13, 2026**

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In The Matter Of:
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
FALL 2025 BOARD MEETING - DAY 2

Vol. 2
January 14, 2026



Original File 1-14-2026 vol 2.prn
Min-U-Script® with Word Index

**UNITED STATES DEPARTMENT OF AGRICULTURE
NATIONAL ORGANIC PROGRAM**

**NATIONAL ORGANIC STANDARDS BOARD (NOSB)
FALL 2025 BOARD MEETING - RESCHEDULED
DAY 2**

**Wednesday,
January 14, 2026
Held via Zoom for Government**

National Organic Standards Board (NOSB) Members

Amy Bruch, NOSB Chair

Allison Johnson, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Kathryn Deschenes

Carolyn Dimitri

Amanda Felder

Andrea Hatziyannis

Cat McCluskey (absent)

Dilip Nandwani

Logan Petrey Linkenhoger

Corie Pierce

Franklin Quarcoo

Kyla Smith

Javier Zamora (absent)

National Organic Program Staff, Standards Division

Erin Healy, Division Director

Jared Clark, Assistant Division Director

Andrea Holm, Agricultural Marketing Specialist

Heather Kumar, NOSB Food Technologist

Michelle Arsenault, NOSB Advisory Committee

Specialist

Jo Mirenda, Agricultural Marketing Specialist

Devin Pattillo, Agricultural Marketing Specialist

Jason Edmonson, Agricultural Economist

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22 But before we get to Handling, the icebreaker that
23 I promised you, I would like to call on a couple people to
24 just summarize a few reflections of yesterday. So if I
25 don't see any hands, I think we coined the term in

1 subcommittee one time; it was called "voluntold." So I'm
2 going to go usually --

3 Oh, I do see a hand. Brian, excellent. Thank you
4 so much.

5 BD. MEM. CALDWELL: Thanks, Amy. And hello to
6 everybody. I just -- it wasn't exactly central yesterday,
7 but certainly behind everything that we did, the comments
8 that we get from the stakeholders are just so vital and
9 helpful. I just want to say that once again, and we really
10 appreciate the thought and the time that goes into those.
11 It's really -- it's really totally essential to make -- to
12 having us do a good job. So thanks so much.

13 NOSB CHAIR BRUCH: Excellent. That's an
14 exceptional call-out. We really appreciate the stakeholder
15 comments.

16 And actually, it seems like this time for our
17 preparation with the Board information, we actually had the
18 two public comment periods. So the first -- those that
19 contributed to the first comment period, we actually were
20 able to have extended time looking at your comments,
21 compared to a normal meeting, so that was incredible.

22 But actually, I'm thinking just because of the
23 unique nature and unprecedented protocol that, kind of, went
24 into this abbreviated format, I might, if --

25 Dr. Tucker, if you wouldn't mind commenting a

1 little bit more on what Brian had mentioned on the public
2 comment period and just, kind of, the uniqueness of this
3 situation.

4 DR. TUCKER: Yeah, I really appreciate Brian's
5 comment and agree. I think both the passion and intellect
6 that goes into public comments is just always impressive.
7 And we did reopen the written comment period for anybody who
8 was not going to be able to give oral comment. But I know
9 that, you know, I have gotten some questions, "Well, why
10 didn't we do oral comment?" and so I wanted to touch on that
11 directly so folks could, kind of, hear our perspective on
12 that.

13 First, we did need to squeeze this meeting into a
14 very, very busy January, both for the Program and for the
15 board members. And you have seen, kind of, board members in
16 and out because they have their full-time jobs, and so it
17 was, kind of, all agreed that a two-day meeting was going to
18 make more sense than a three-day meeting given the
19 compression of the schedule.

20 The other factor here is just the clock. You
21 know, we didn't get back until mid-November. We knew we
22 wanted to have a meeting by mid-January. Just getting the
23 announcement through the USDA system and over to the Federal
24 Register was a huge lift for the staff and working its way
25 through the building. We didn't know when it was going to

1 actually publish, and that was going to bring us right up to
2 the holidays. And so I think this gives me an opportunity
3 to praise Michelle. I don't think people really understand
4 what goes into scheduling public commenters. You know, if
5 people have -- they sign up, she's got to slot them in, she
6 has to send them out, "Well, here's your slot," and then try
7 and move people around as they need to. It is a huge lift.
8 And so trying to do that in the very, very, very compressed
9 period of time that we had to work with to even get this
10 meeting approved and published, that's why we didn't do oral
11 public comments. I think we all did the absolute best we
12 could in the time we did, and we're having a very successful
13 meeting because of it.

14 But please don't read this as some, "Oh, we're not
15 doing public comment anymore." This was an incredibly
16 unusual situation. And so we wanted to talk about that
17 directly, as this was a really unusual situation. So please
18 do not take that as an indicator of something bigger than it
19 actually is.

20 And let's give Michelle a big round of applause
21 for all the public comment arrangements she has made over,
22 you know, 14 years that have gone extremely smoothly.
23 (Zoom applause.)

24 DR. TUCKER: So thanks. Back to you, Amy.

25 NOSB CHAIR BRUCH: Excellent. Well, thank you,

1 Brian, for that comment and Jenny for that follow-up.

2 That's really extremely helpful.

3 And then one additional add-on there is that, you
4 know, the documents, again, I mentioned this yesterday; the
5 documents that we are not currently deliberating on due to
6 the scope and the abbreviated nature of this meeting, we are
7 processing and leveraging those public comments and most of
8 the documents that actually are not seen today, but will be
9 at our spring meeting in May, will have refreshed approach
10 based on that public comment period. So we'll be able to
11 continue public comment -- or continue the process of
12 improvement and then weigh in again on those documents that
13 are slightly refreshed. So thank you.

14 That was a great lead-in. And I think that's why
15 we're not doing icebreakers, because they do, kind of, delay
16 our momentum here. But I think the unpackaging of these
17 ideas is so important.

18 Let's see. Did I see Kathryn's hand for
19 reflection, briefly? Did that come up? Okay, excellent,
20 Kathryn.

21 BD. MEM. DESCHENES: Yes.

22 NOSB CHAIR BRUCH: I'm going to call on you then.

23 BD. MEM. DESCHENES: I was just going to say I
24 have been impressed by the Super Seniors' commitment to the
25 very end. So just wanted to give you guys a round of thanks

1 for continuing to stay engaged and really into the very end.
2 So.

3 (Zoom applause.)

4 NOSB CHAIR BRUCH: How touching, thoughtful.
5 Thank you. We're a team till the end. And then you'll
6 probably see us on the other side, maybe in the public
7 comment form, potentially. So thank you so much. We're so
8 excited to be a part of the process.

9 Wow, Kyla, I see your hand also, because in my
10 mind, I think that's why we're connected. Usually when we
11 have in-person meetings, you are my tablemate, so we have a
12 connection here. But go ahead, Kyla.

13 BD. MEM. SMITH: I have two.

14 NOSB CHAIR BRUCH: Okay.

15 BD. MEM. SMITH: I just love the NOP Update. I
16 feel like it's such -- always jam-packed with such useful
17 information. Like I said, I was furiously taking notes, and
18 so Jenny and the whole team, just thanks for all the
19 information and being so candid and transparent in your
20 updates.

21 The second one is that I just appreciate the
22 respectful discourse. I mean, we're not all on all of the
23 subcommittees, and so -- and you know, everybody's expertise
24 really shone through yesterday, and, you know, we didn't all
25 agree all the time. The votes showed that. And -- but I

1 felt like, you know, we all walked away from the table
2 feeling heard -- or the virtual table, all feeling heard, or
3 at least I did. I felt heard and thought that the discourse
4 was -- and the debate were very respectful.

5 NOSB CHAIR BRUCH: Excellent. Great call-outs
6 there, Kyla. Definitely appreciate the culture. It really
7 was prevalent from our Super Senior year entering in when we
8 were freshmen. The culture of the Board was impressive and
9 felt safe to have differing opinions and be able to
10 deliberate and stress-test all these Work Agenda items. I'm
11 glad that that has continued.

12 All right, well, I'm going to do a quick -- we're
13 going to do a quick, we're going to call it reverse roll
14 call. I am scanning the room here, and we do have great
15 communication on the back end, but everybody is here minus
16 Cat and Logan, and we expect them to be tuning in throughout
17 the day. They had some other commitments outside of this
18 meeting, but they are going to be popping in and out. And
19 again, for the record, Javier is not present today. He is
20 absent.

21 And with that, Michelle, did I cover -- I believe
22 I got everybody. I see Nate is on; his technical
23 difficulties are ironed out already, which is excellent.

24 We will proceed with Handling, so -- Part II of
25 Handling. I'm going to turn over the mic to you, Allison,

1 Chair of Handling. Thank you.

2 Oh, but -- but before -- I see a slide that just
3 came in here. I, kind of, did a quick overview before we
4 got started, but here is what today is going to be covering.
5 And I appreciate the update to note that Handling is
6 continued. And, as I mentioned, we'll be going through a
7 few other subcommittees: Livestock, CACS, Compliance,
8 Accreditation and Certification, and Materials. The one
9 subcommittee that we, due to scope, did not have a report
10 from -- not that there was an extreme amount of work done in
11 it -- was PDS, so that will be -- the PDS agenda will be
12 covered in the upcoming spring meeting in May. But after we
13 convene with the Material Subcommittee, we will go on to the
14 administrative business, reviewing the Spring Meeting Work
15 Agenda that we're all working on in parallel, officer
16 elections, and then the, kind of, changing of the guards
17 here with the recognition of outgoing members and then any
18 other business.

19 So now, without further ado, Allison, I will turn
20 it over to you. Thank you so much.

21 NOSB VICE CHAIR JOHNSON: Thanks, Amy. Can you
22 give me a minute to switch my audio?

23 (Pause.)

24 NOSB VICE CHAIR JOHNSON: Can you hear okay?

25 NOSB CHAIR BRUCH: Absolutely. Coming in clear.

1 NOSB VICE CHAIR JOHNSON: I'll talk through the
2 headphones today.

3 Good morning, everyone. Thank you. I want to
4 echo all the comments about great discussion and respectful
5 discussion yesterday, as well as the value that we've gotten
6 from the public comments that came in, and we ran to the
7 very last minute on cornstarch. So I just wanted to close
8 the loop there and note that the discussion will make sure
9 to capture the issues that might come up for baking powder
10 so that we can ensure there's a smooth transition there, as
11 that material was voted off the list.

12 So today we have the rest of our 606 materials.
13 So I'll start with colors, and then we'll have glycerin,
14 inulin-oligofructose enriched, and orange shellac. And then
15 we'll hand it over to Livestock.

16 So colors. We have an interesting history here,
17 and I'll be curious to hear how the discussion goes. There
18 have been a number of colors listed on 606. The last
19 Sunset, the board voted eight colors off the list, and so we
20 have 10 remaining, and we didn't get much specific
21 information about any of them in comments. In general,
22 colors are used to meet, or to shape really, consumer
23 expectations about how food should look. And there were
24 many comments about just generally retaining access to
25 colors and flexibility there because it is important for

1 consumer uptake.

2 Some commenters pointed to the availability of
3 organic crops that are used to make these colors, but we did
4 hear from color manufacturers that that's not necessarily a
5 one-to-one translation. Typically you grow a specific
6 variety for color, so it may not be interchangeable for many
7 of these colors if a food crop is already in production
8 that's organic.

9 Cost came up in a lot of comments. But just a
10 reminder that that's not a permissible justification for
11 keeping a non-organic material on the list. There were
12 comments about organic colors being weaker in strength and
13 so more expensive, and then, you know, adding on to that
14 cost as you get more and more organic requirements in the
15 mix. But those should not be part of our deliberation about
16 whether to retain these materials.

17 There were some interesting comments about the
18 changing landscape for colors. The FDA, Food and Drug
19 Administration, has called for a voluntary phase-out of
20 certain synthetic colors. And so there were a number of
21 comments that said the industry is acting quickly to shift
22 to natural colors in response to that call for change. They
23 noted that R&D and reformulation are happening and that
24 changes will actually be in place for school food this fall.
25 But those commenters generally said it's important to keep

1 the non-organic colors on the list to meet this changing
2 landscape and make sure a variety of natural color options
3 remain available. But I just want to pull out that organic
4 products already don't use synthetic colors. They've
5 already always been prohibited in organic, and it's not
6 clear to me how continuing to raise the bar for colors used
7 in organic would cause problems for non-organic products.
8 If anything, more organic colors on the market would mean
9 more options available for everyone and more opportunities
10 to avoid harmful synthetic chemicals.

11 Commenters named a number of specific challenges
12 with organic colors, including color shade and strength,
13 performance, forms available, and quantities, including a
14 particular challenge around accessing smaller quantities.
15 Often these are, like, contracted products, so if you're
16 ordering just a small amount, that can be a challenge, and
17 that's important to keep in mind. None -- I think I'm being
18 accurate, none of those comments were about a specific color
19 that is on the list, though. They were general.

20 Excuse me one sec.

21 (Pause.)

22 NOSB VICE CHAIR JOHNSON: And then finally, we did
23 have commenters name that we should be concerned about
24 ongoing use of non-organic colors in organic products
25 because of the use of toxic chemicals in production, and

1 raising a concern that those toxins could be more
2 concentrated in color products.

3 One commenter did say it's possible that the rest
4 of the colors could be commercially available in five years.
5 Another noted that from a farming point of view, most of the
6 crops used for the listed colors could come into production
7 within a year or two. So it's -- you know, this ongoing
8 demand and how you chicken-and-the-egg influence demand and
9 supply in these cases. It was also noted that accounting
10 for -- could be flexible, if needed.

11 There was a request that if colors are relisted,
12 there be a limited-scope TR for the next Sunset to look at
13 the remaining barriers for these specific colors.

14 So, I'll go through each color and summarize the
15 comments that we received, and then I think we should vote
16 on them one-by-one as we go through that. And so, just a
17 reminder, commercial availability is essentiality and form,
18 quality, quantity; does not include the cost, and there is
19 some deference to certifiers in the definition, as well.

20 I'll maybe pause there for any general discussion,
21 and then we can go through each of the individual colors.
22 Any questions or comments so far?

23 Kathryn.

24 BD. MEM. DESCHENES: I just wanted to acknowledge,
25 so we have, right, states and looking at more states banning

1 the synthetic colors, which I think, just from a handler's
2 perspective, like, it concerns me that potentially these
3 manufacturers making the organic colors won't be focused on,
4 you know, beefing up that supply. They'll be focused on
5 general, you know, public, general products, conventional
6 products that are going to need to utilize these ingredients
7 versus, you know, trying to make them organic. So I think
8 that's a concern in the back of my head. Like, is this the
9 right moment to delist some of these things?

10 So I just want to acknowledge that and make sure
11 we raise that here, because I think that this is
12 unprecedented in terms of the landscape that manufacturers
13 are facing.

14 NOSB VICE CHAIR JOHNSON: Yeah. Thank you. And I
15 do think that one could cut in either direction, right? The
16 change in the marketplace is because -- not a mandate, but a
17 directive or a call to action. So does the organic
18 community put a similar call to action in place or not? And
19 that, you know, is going to determine where the attention of
20 the manufacturers goes. But point taken that they're going
21 to be awfully busy in the next few years.

22 Kyla, go ahead.

23 BD. MEM. SMITH: Yeah. I -- similar comment.
24 Just like when I was reading the comments, in, like, in
25 particular around the impacts of MAHA and the supply chain,

1 it was more just, like, this unknown landscape. And so,
2 like, again, like, just because there is so much unknown
3 with where the -- the direction that will, yy, happen here
4 as a result, I don't know. Yeah, I'm just concerned about
5 the timing and that if a non-organic company is going to be
6 required to not use a synthetic, that could have varying
7 impacts on the supply that we just don't know that would
8 then ultimately impact an organic operation? And so, just,
9 yeah, feeling a little nervous about wanting to make sure
10 that there's, like, all the tools in the toolbox, and we
11 don't get, like, shoehorned into this one specific path,
12 because we don't know.

13 NOSB VICE CHAIR JOHNSON: Yeah. It's a tricky
14 one, right, because it could also be an opportunity where
15 all these companies are already looking at their portfolios
16 and making changes. Could they be making sure that they're
17 including organic options as they go through that
18 reformulation process at the same time?

19 I do want to push back. This was top of mind
20 yesterday, and then we didn't make it to colors, but tools
21 in the toolbox, for me, is not 606. 606 is, I need this one
22 specific item and I cannot get it in organic form, so I can
23 continue to use a non-organic form. It's not about having
24 all the options available; it's this is essential to my
25 product, and I cannot get it as organic. So we did receive

1 a number of comments from the color industry that seemed to
2 be about preserving, honestly, market share for natural
3 color manufacturers that are non-organic, and that is not a
4 reason to keep something on 606.

5 Andrea, go ahead.

6 BD. MEM. FELDER: Your comments were timely. I
7 was just thinking the same thing; that I've also had some
8 comments that these are the materials that are not widely
9 available in organic, and so the option is to not have a
10 color in the product, which is really not supporting the
11 consumer, right? So we do want to urge them to continue
12 using these and have them be available. And then, when the
13 materials are available in organic, you know, push them to
14 move there.

15 You mentioned that some of the colors were taken
16 off the list last year because they're more available in
17 organic and the raw materials are there. Some of these, the
18 raw materials have not proliferated to the point where they
19 can use them, so I want to be mindful to not limit their
20 toolbox to have no color, right?

21 NOSB VICE CHAIR JOHNSON: Absolutely. Nate, go
22 ahead.

23 SECRETARY LEWIS: (No audible response.)

24 NOSB VICE CHAIR JOHNSON: I can't hear you. It
25 sounds like you're in, like, a far, far away land. There's,

1 like, a little tiny noise.

2 SECRETARY LEWIS: How about now? Lean in.

3 NOSB VICE CHAIR JOHNSON: A little -- is there a
4 mic that you can get close to?

5 SECRETARY LEWIS: Come back to me.

6 NOSB VICE CHAIR JOHNSON: You're coming loud --
7 you were louder just for a second.

8 SECRETARY LEWIS: Um --

9 NOSB VICE CHAIR JOHNSON: There you go.

10 SECRETARY LEWIS: I'll lean in. Sorry about that
11 distraction. I think I'm compelled, Allison, by your
12 centering of this discussion around our National List
13 criteria. I know that colors are, kind of, in the
14 crosshairs of Make America Healthy Again, but I just want to
15 remind this group that, from what I can tell, MAHA isn't
16 really based on science or a strong regulatory framework,
17 and those are two of the underpinnings of the organic
18 community. So I'm reticent to get wrapped up too much in
19 that fervor, because I feel like it really runs counter to
20 the process that we use to make our sound, scientific-based
21 decisions that rely on a strong regulatory system to
22 enforce.

23 So, that being said, I look forward to, kind of,
24 evaluating each one individually against our National List
25 criteria, because I feel like that's what our -- that's our

1 position of strength. So look forward to seeing what these
2 votes come out as.

3 NOSB VICE CHAIR JOHNSON: Thanks, Nate. That, I
4 think, is a good cue to go into the specifics.

5 So, again, we got very little information about
6 who needs these. We did get, throughout, some information
7 about -- from certifiers about members who are currently
8 using them. We also got information from one certifier
9 about members who have completely shifted away from the non-
10 organic ones, so they thought there were a number of colors
11 that could come off the list.

12 Most of the support for retention was around,
13 "Let's keep all the options open," but not, "I need this
14 color in this product." So I'll try to flag any exceptions
15 to those generalities as we go through.

16 All right, so first up, beet juice extract color.
17 In the past, there's been mixed information about form and
18 quantity available. The Subcommittee voted unanimously to
19 relist this material. Several certifiers reported that it's
20 in use. There was no specific information provided about
21 commercial availability as it stands now, beyond there being
22 organic beets on the market.

23 Any discussion or comments on beet juice extract
24 color?

25 (No response.)

1 NOSB VICE CHAIR JOHNSON: All right. I think,
2 Amy, I'll kick -- we'll do a back and forth; kick it over to
3 you to vote, and then we'll move to the next color.

4 NOSB CHAIR BRUCH: Excellent. Thank you, Allison.

5 As there are no questions, we will proceed. The
6 motion is to remove beet juice extract color from the
7 National List. Motioned by Allison, seconded by Amanda.
8 And it appears that Amanda actually will start off her votes
9 for today.

10 BD. MEM. FELDER: No.

11 NOSB CHAIR BRUCH: Andrea.

12 BD. MEM. HATZIYANNIS: No.

13 NOSB CHAIR BRUCH: Allison.

14 NOSB VICE CHAIR JOHNSON: Yes.

15 NOSB CHAIR BRUCH: Okay. Nate.

16 SECRETARY LEWIS: No.

17 NOSB CHAIR BRUCH: Cat.

18 BD. MEM. McCLUSKY: (No response.)

19 NOSB CHAIR BRUCH: Absent. Dilip.

20 BD. MEM. NANDWANI: No.

21 NOSB CHAIR BRUCH: Logan.

22 BD. MEM. PETRY LINKENHOGGER: (No response.)

23 NOSB CHAIR BRUCH: Absent. Corie.

24 BD. MEM. PIERCE: Yes.

25 NOSB CHAIR BRUCH: Franklin.

1 BD. MEM. QUARCOO: No.
2 NOSB CHAIR BRUCH: Kyla.
3 BD. MEM. SMITH: No.
4 NOSB CHAIR BRUCH: Javier.
5 BD. MEM. ZAMORA: (No response.)
6 NOSB CHAIR BRUCH: Absent. Brian.
7 BD. MEM. CALDWELL: No.
8 NOSB CHAIR BRUCH: Kathryn.
9 BD. MEM. DESCHENES: No.
10 NOSB CHAIR BRUCH: Carolyn?
11 BD. MEM. DIMITRI: Yes.
12 NOSB CHAIR BRUCH: And the Chair votes no.
13 SECRETARY LEWIS: Three yes, nine no, zero
14 abstentions, zero recusals, three absent; the motion fails.
15 NOSB VICE CHAIR JOHNSON: Great. Thank you.
16 Okay, beta carotene extract color. This had a
17 little bit more discussion than most of the other colors.
18 There were previously strong concerns about the supply. The
19 Subcommittee voted unanimously to relist. Several
20 certifiers reported that it was in use, and commenters noted
21 that it's particularly important for dairy. One certifier
22 supported delisting it because all its certified operations
23 have switched to organic options. And one large dairy
24 operation also reported using organic annatto and not
25 currently relying on beta carotene color extract.

1 So based on the comments, this color has more
2 specific information supporting listing in the record, but
3 also more direct information supporting removal. So still,
4 kind of, a mixed bag, but a few more data points to
5 consider.

6 Any comments or discussion on this one? Brian.

7 BD. MEM. CALDWELL: Yeah, just the question; is
8 this used in butter? Is that the main thing?

9 NOSB VICE CHAIR JOHNSON: I think cheese.

10 BD. MEM. CALDWELL: Cheese, okay.

11 NOSB VICE CHAIR JOHNSON: Like, orange cheddar.

12 Any other questions or comments?

13 (No response.)

14 NOSB VICE CHAIR JOHNSON: All right, Amy, let's
15 vote.

16 NOSB CHAIR BRUCH: Okay, the motion is to remove
17 beta carotene extract color from the National List. It was
18 motioned by Allison, seconded by Dilip. And we will start
19 the voting with Andrea.

20 BD. MEM. HATZIYANNIS: No.

21 NOSB CHAIR BRUCH: Allison.

22 NOSB VICE CHAIR JOHNSON: Spacebar doesn't work
23 today. Yes.

24 NOSB CHAIR BRUCH: Nate.

25 SECRETARY LEWIS: No.

1 NOSB CHAIR BRUCH: Cat.
2 BD. MEM. McCLUSKY: (No response.)
3 NOSB CHAIR BRUCH: Absent. Dilip.
4 BD. MEM. NANDWANI: No.
5 NOSB CHAIR BRUCH: Logan.
6 BD. MEM. PETRY LINKENHOGGER: (No response.)
7 NOSB CHAIR BRUCH: Absent. Corie.
8 BD. MEM. PIERCE: No.
9 NOSB CHAIR BRUCH: Franklin.
10 BD. MEM. QUARCOO: No.
11 NOSB CHAIR BRUCH: Kyla.
12 BD. MEM. SMITH: No.
13 BD. MEM. SMITH: Javier.
14 BD. MEM. ZAMORA: (No response.)
15 NOSB CHAIR BRUCH: Absent. Brian.
16 BD. MEM. CALDWELL: Yes.
17 NOSB CHAIR BRUCH: Kathryn.
18 BD. MEM. DESCHENES: No.
19 NOSB CHAIR BRUCH: Carolyn.
20 BD. MEM. DIMITRI: Yes.
21 NOSB CHAIR BRUCH: Amanda.
22 BD. MEM. FELDER: (No audible response.)
23 NOSB CHAIR BRUCH: Amanda. Sorry I missed.
24 BD. MEM. FELDER: No.
25 NOSB CHAIR BRUCH: Okay, thank you.

1 SECRETARY LEWIS: I missed that one.

2 NOSB CHAIR BRUCH: Okay, no problem. And the
3 Chair votes --

4 SECRETARY LEWIS: What was Amanda's vote? Sorry,
5 I missed it.

6 NOSB CHAIR BRUCH: Amanda, go ahead.

7 BD. MEM. FELDER: No.

8 NOSB CHAIR BRUCH: Okay. For some reason you are
9 light at times. Try it one more time. I heard you that
10 time.

11 BD. MEM. FELDER: Just a reactionary thing here.

12 NOSB CHAIR BRUCH: Okay. .

13 BD. MEM. FELDER: It's no.

14 NOSB CHAIR BRUCH: Okay. Just confirming no
15 technical difficulties there.

16 BD. MEM. FELDER: No. I think it just glitches.

17 NOSB CHAIR BRUCH: Okay. And the Chair votes yes.

18 SECRETARY LEWIS: Let's see, we have five yes,
19 seven no, zero abstentions, zero recusals, three absent; the
20 motion fails.

21 NOSB VICE CHAIR JOHNSON: All right, next up is
22 black/purple -- black or purple carrot juice color. Here in
23 the past, there's been mixed information about the supply
24 adequacy and the color variation. The Subcommittee vote was
25 split, two for delisting, five for relisting. Certifiers

1 reported fairly high use of this color relative to others on
2 the list, more than 10 operations using it that were
3 reported, and there was no specific information provided
4 about the commercial availability of the color beyond there
5 being organic carrots on the market.

6 Any discussion questions on this one?

7 (No response.)

8 NOSB VICE CHAIR JOHNSON: All right, Amy.

9 NOSB CHAIR BRUCH: Okay, thank you, Allison.

10 The motion is to remove black/parrot -- or --
11 sorry. The motion is to remove black/purple carrot juice
12 color from the National List. It was motioned by Allison,
13 seconded by Amanda. And the voting starts with Allison.

14 NOSB VICE CHAIR JOHNSON: Yes.

15 NOSB CHAIR BRUCH: Nate.

16 SECRETARY LEWIS: No.

17 NOSB CHAIR BRUCH: Cat.

18 BD. MEM. McCLUSKY: (No response.)

19 NOSB CHAIR BRUCH: Absent. Dilip.

20 BD. MEM. NANDWANI: No.

21 NOSB CHAIR BRUCH: Logan.

22 BD. MEM. PETRY LINKENHOGGER: (No response.)

23 NOSB CHAIR BRUCH: Absent. Corie.

24 BD. MEM. PIERCE: Yes.

25 NOSB CHAIR BRUCH: Franklin.

1 BD. MEM. QUARCOO: No.
2 NOSB CHAIR BRUCH: Kyla.
3 BD. MEM. SMITH: No.
4 NOSB CHAIR BRUCH: Javier.
5 BD. MEM. ZAMORA: (No response.)
6 NOSB CHAIR BRUCH: Absent. Brian.
7 BD. MEM. CALDWELL: Yes.
8 NOSB CHAIR BRUCH: Kathryn.
9 BD. MEM. DESCHENES: No.
10 NOSB CHAIR BRUCH: Carolyn?
11 BD. MEM. DIMITRI: Yes.
12 NOSB CHAIR BRUCH: Amanda.
13 BD. MEM. FELDER: No.
14 NOSB CHAIR BRUCH: Andrea.
15 BD. MEM. FELDER: No.
16 NOSB CHAIR BRUCH: Then the Chair votes yes.
17 SECRETARY LEWIS: Five yes, seven no, zero
18 abstentions, zero recusals, three absent; the motion fails.
19 NOSB VICE CHAIR JOHNSON: Thank you.
20 Okay, next up is chokeberry, aronia juice color.
21 We had some good discussion about this in the spring.
22 There's been limited information about the consistency and
23 supply of it. I remember Amy did note that there are an
24 awful lot of chokeberries floating around in the
25 marketplace. The Subcommittee vote was split, three for

1 delisting, four for relisting. No certifiers reported use,
2 and several certifiers reported having no certified
3 operations using it. So we have no evidence that anybody is
4 actually using this currently. No specific information was
5 provided about the commercial availability of the color
6 beyond there being organic chokeberries on the market.

7 Questions or discussion? Amy.

8 NOSB CHAIR BRUCH: Yes. I think the market is
9 ready for addition of the substance in a lot of products.
10 It's promoted locally as a superfruit. So we know acai and
11 some of the beautiful berries out there that have high
12 antioxidant properties. And this is a new one, and it's
13 also Midwest-hardy. We can be growing this in the Midwest.
14 I was actually one year was able to rent a farm for, kind
15 of, row-crop production that was already certified organic,
16 and it had a few acres of these aronia berries on there.
17 And I did a lot of research with markets. This was maybe
18 2018 time frame, and there were a lot of folks in the
19 Midwest planting these, hoping the market would come,
20 planting these, managing them organically. And
21 unfortunately, the market potential really was not there. I
22 think we were ahead of the time, but I'm trying to feed this
23 as a potential market expansion. Organic producers, and
24 like I said, in the Midwest can do this.

25 I think the rootstock, a lot of the parallels, if

1 you, kind of, follow the latitude line, there's strong
2 presence of chokeberries and aronia berries in Poland. So
3 if we just, kind of, trace that latitude line there, just a
4 Midwest-hardy crop. So I would love to see this, you know,
5 product formulation include these and open up another market
6 for Midwest growers. But, you know, they -- in the Midwest,
7 we harvested them, didn't necessarily have a home, and a lot
8 of them sat in freezers for a long, long time.

9 But I don't know the status now, but I think a
10 market expansion would be welcomed, and I think a few -- you
11 know, Midwest production could be rallied to support this.

12 So, that's my comment there.

13 NOSB VICE CHAIR JOHNSON: Super helpful, Amy.
14 Thank you.

15 NOSB CHAIR BRUCH: Yeah.

16 NOSB VICE CHAIR JOHNSON: I feel like chokeberry
17 is in need of a rebrand, if we can come up with another name
18 for it.

19 NOSB CHAIR BRUCH: Yeah.

20 NOSB VICE CHAIR JOHNSON: Something --

21 NOSB CHAIR BRUCH: Much nicer. Yes, I would
22 agree.

23 NOSB VICE CHAIR JOHNSON: Corie, go ahead.

24 BD. MEM. PIERCE: Yeah, just to echo that. We can
25 grow them in the Northeast here, too, and we call them

1 aronia berry. And there's a lot organically grown and going
2 into beverages here. So, yeah, I've seen in the last 10
3 years a lot of really small producers starting to plant
4 quite a bit of these. So I agree with what you just said,
5 Amy.

6 NOSB VICE CHAIR JOHNSON: Exciting. Thanks,
7 Corie.

8 NOSB CHAIR BRUCH: Thanks, Corie.

9 NOSB VICE CHAIR JOHNSON: Okay, any other
10 comments? Discussion? Questions?
11 (No response.)

12 NOSB VICE CHAIR JOHNSON: Let's move to the vote.

13 NOSB CHAIR BRUCH: All right, there is a motion to
14 remove chokeberry, aronia juice color from the National
15 List. Motioned by Allison, seconded by Kathryn. We will
16 start the voting with Nate.

17 SECRETARY LEWIS: No.

18 NOSB CHAIR BRUCH: Cat.

19 BD. MEM. McCLUSKY: (No response.)

20 NOSB CHAIR BRUCH: Absent. Dilip.

21 BD. MEM. NANDWANI: No.

22 NOSB CHAIR BRUCH: Logan.

23 BD. MEM. PETRY LINKENHOGGER: (No response.)

24 NOSB CHAIR BRUCH: Absent. Corie.

25 BD. MEM. PIERCE: Yes.

1 NOSB CHAIR BRUCH: Franklin.
2 BD. MEM. QUARCOO: No.
3 NOSB CHAIR BRUCH: Kyla.
4 BD. MEM. SMITH: No.
5 NOSB CHAIR BRUCH: Javier.
6 BD. MEM. ZAMORA: (No response.)
7 NOSB CHAIR BRUCH: Absent. Brian.
8 BD. MEM. CALDWELL: Yes.
9 NOSB CHAIR BRUCH: Kathryn.
10 BD. MEM. DESCHENES: Yes.
11 NOSB CHAIR BRUCH: Carolyn.
12 BD. MEM. DIMITRI: Yes.
13 NOSB CHAIR BRUCH: Amanda.
14 BD. MEM. FELDER: No.
15 NOSB CHAIR BRUCH: Andrea.
16 BD. MEM. HATZIYANNIS: No.
17 NOSB CHAIR BRUCH: Allison.
18 NOSB VICE CHAIR JOHNSON: Yes.
19 NOSB CHAIR BRUCH: And the Chair votes yes.
20 SECRETARY LEWIS: Six yes, six no, zero
21 abstentions, zero recusals, three absent; the motion fails.
22 NOSB VICE CHAIR JOHNSON: All right. We're almost
23 halfway there, folks.
24 Next up is elderberry juice color. This one has a
25 limited supply. The Subcommittee vote was split three for

1 delisting, four for relisting. Sorry; I should have said in
2 the past it has been reported there's a limited supply. We
3 didn't get new information. One certified operation was
4 reported as using it. Other certifiers reported having no
5 certified operations using it. There was no specific
6 information provided about the commercial availability, as
7 it stands now, beyond there being organic elderberries on
8 the market.

9 Questions or discussion?

10 (No response.)

11 NOSB VICE CHAIR JOHNSON: All right, so let's
12 vote.

13 NOSB CHAIR BRUCH: Okay, there's a motion to
14 remove elderberry juice color from the National List.
15 Motioned by Allison, seconded by Dilip. And the voting
16 starts with, let's see, I believe Cat.

17 BD. MEM. McCLUSKY: (No response.)

18 NOSB CHAIR BRUCH: Absent. Dilip.

19 BD. MEM. NANDWANI: Abstain.

20 NOSB CHAIR BRUCH: Logan.

21 BD. MEM. PETRY LINKENHOGGER: (No response.)

22 NOSB CHAIR BRUCH: Absent. Corie.

23 BD. MEM. PIERCE: Yes.

24 NOSB CHAIR BRUCH: Franklin.

25 BD. MEM. QUARCOO: Yes.

1 NOSB CHAIR BRUCH: Kyla.
2 BD. MEM. SMITH: No.
3 NOSB CHAIR BRUCH: Javier.
4 BD. MEM. ZAMORA: (No response.)
5 NOSB CHAIR BRUCH: Absent. Brian.
6 BD. MEM. CALDWELL: Yes.
7 NOSB CHAIR BRUCH: Kathryn.
8 BD. MEM. DESCHENES: No.
9 NOSB CHAIR BRUCH: Carolyn.
10 BD. MEM. DIMITRI: Yes.
11 NOSB CHAIR BRUCH: Amanda.
12 BD. MEM. FELDER: No.
13 NOSB CHAIR BRUCH: Andrea.
14 BD. MEM. HATZIYANNIS: No.
15 NOSB CHAIR BRUCH: Allison.
16 BD. MEM. DIMITRI: Yes.
17 NOSB CHAIR BRUCH: And the Chair votes yes.
18 SECRETARY LEWIS: You didn't -- you didn't get my
19 vote, but my vote is --
20 NOSB CHAIR BRUCH: Oh, sorry. Sorry, Nate. I
21 missed you. I apologize. Oh, I see what I did on my sheet.
22 Okay. Go ahead, Nate. I'm so sorry.
23 SECRETARY LEWIS: No worries. No. And then what
24 was your --
25 NOSB CHAIR BRUCH: No. The Chair votes yes.

1 SECRETARY LEWIS: Okay, six yes, five no, one
2 abstention, zero recusals, three absent; the motion fails.

3 NOSB CHAIR BRUCH: Thank you, Nate.

4 NOSB VICE CHAIR JOHNSON: All right.

5 SECRETARY LEWIS: And just a reminder to the folks
6 looking on who may not have the experience with the Board,
7 even though there were more yes votes than no votes,
8 National List changes require a two-thirds majority of the
9 Board to be an affirmative vote, so that's why there were
10 more yes votes, but the motion did not pass.

11 NOSB VICE CHAIR JOHNSON: Thanks for the reminder,
12 Nate. And I see in the chat someone is saying it's hard to
13 hear you. I think the sound is coming through clear now,
14 but the louder you can be, the better, I guess.

15 Okay, grape skin extract color. So this one is
16 complicated by the limitation on sulfites in wine labeled
17 organic, so only colors from wine made without added
18 sulfites that would qualify for an organic claim could be
19 used then as organic grape skin extract color, or it could
20 be from outside the winemaking process, but that's not
21 likely to be a source, so that means the supply is likely to
22 remain limited unless the rules for sulfites change for
23 wine. The Subcommittee vote was split. We had one for
24 delisting, five for relisting, and there were a couple of
25 certified operations that were reported as using it.

1 Any discussion? Questions? Comments?

2 BD. MEM. DIMITRI: Allison, could you please
3 repeat what you said about the natural wine?

4 NOSB VICE CHAIR JOHNSON: Yeah. So if you'll
5 recall, wine to be labeled organic wine cannot have added
6 sulfites. If sulfites are added, wine that is made
7 exclusively with organic grapes can be labeled made with
8 organic if it's below a certain threshold for sulfites. But
9 if you had grape skin extract from that process because of
10 the presence of sulfites, I believe that color would not
11 qualify for an organic label claim. So the only -- if we're
12 talking primarily about a byproduct of winemaking, only the
13 grape skin extract from winemaking that was organic, so
14 without added sulfites, could qualify for an organic claim.
15 And there are quite a small number of producers who are
16 using that organic label on wine.

17 Amy.

18 NOSB CHAIR BRUCH: Thank you, Allison, for that.

19 I just had a question. Perhaps maybe Amanda, or
20 maybe there's others; are you aware, could you articulate
21 some of the production challenges with growing grapes
22 organically? I just, you know, had heard through different
23 conversations that that -- that grapes, in general, are a
24 little more challenging. Do you have any insight there? Or
25 is that just maybe a general statement? Everything's hard

1 to grow organic, but is there anything special about grapes?

2 BD. MEM. FELDER: I don't have any experience, so
3 I don't want to just comment hypothetically on what I would
4 assume. Sorry.

5 NOSB CHAIR BRUCH: No problem. No problem. No
6 problem.

7 Anybody else have any comment there? Or, I'll
8 just, kind of, go on my own production world and do some
9 research, if it was more of a general or if there's
10 something specific?

11 NOSB VICE CHAIR JOHNSON: In the wine sector, when
12 I was in certification, there were many organic vineyards,
13 and often consumers don't see that because of the limitation
14 on sulfites in the winemaking process. So they're --
15 they're not labeling, but the grapes are organic.

16 NOSB CHAIR BRUCH: Got it. Got it. I know from
17 my field trips out there, it seemed like, you know, I feel
18 like every production region has a challenge, whether I
19 think the three are, you know, either mold and fungus,
20 you're going to have insects, or you're going to have weeds.
21 You know, those are, kind of, the three-legged stool that we
22 need to face agronomically. And I always felt like in
23 California, the challenge was -- the disease pressure was
24 really strong there, and a lot of folks are doing the cover
25 crops to try to help naturally fight some of those diseases.

1 But thank you, Allison, that's -- that's helpful
2 on that information. I appreciate that.

3 NOSB VICE CHAIR JOHNSON: Yeah, I think a lot of
4 growers use sulfur in the vineyard.

5 NOSB CHAIR BRUCH: Um-hmm. Okay.

6 NOSB VICE CHAIR JOHNSON: Dilip.

7 BD. MEM. NANDWANI: Thanks. A very quick comment
8 of what Amy just mentioned.

9 To my limited knowledge, organic grape, yes, it is
10 possible, but it has lot of -- lots of challenges. You
11 know, while talking here in Tennessee and some other parts
12 of the Southeast, so there are a lot of challenges you
13 already described. So just a quick comment on what you just
14 mentioned. Thank you.

15 NOSB CHAIR BRUCH: Thanks for jumping in there,
16 Dilip.

17 NOSB VICE CHAIR JOHNSON: Yeah. Thank you.

18 All right, any more discussion or questions on
19 this one?

20 (No response.)

21 NOSB VICE CHAIR JOHNSON: All right, let's vote.

22 NOSB CHAIR BRUCH: All right, there's a motion to
23 remove grape skin extract color from the National List. It
24 was a motion by Allison, seconded by Amanda. We will begin
25 our voting with Dilip.

1 BD. MEM. NANDWANI: Yes.
2 NOSB CHAIR BRUCH: Logan.
3 BD. MEM. PETRY LINKENHOGGER: (No response.)
4 NOSB CHAIR BRUCH: Absent. Corie.
5 BD. MEM. PIERCE: Yes.
6 NOSB CHAIR BRUCH: Franklin.
7 BD. MEM. QUARCOO: Yes.
8 NOSB CHAIR BRUCH: Kyla.
9 BD. MEM. SMITH: No.
10 NOSB CHAIR BRUCH: Javier.
11 BD. MEM. ZAMORA: (No response.)
12 NOSB CHAIR BRUCH: Absent. Brian.
13 BD. MEM. CALDWELL: Abstain.
14 NOSB CHAIR BRUCH: Kathryn.
15 BD. MEM. DESCHENES: No.
16 NOSB CHAIR BRUCH: Carolyn.
17 BD. MEM. DIMITRI: Yes.
18 NOSB CHAIR BRUCH: Amanda.
19 BD. MEM. FELDER: No.
20 NOSB CHAIR BRUCH: One more time, sorry.
21 BD. MEM. FELDER: No.
22 NOSB CHAIR BRUCH: Andrea.
23 BD. MEM. HATZIYANNIS: No.
24 NOSB CHAIR BRUCH: Allison.
25 NOSB VICE CHAIR JOHNSON: Yes.

1 NOSB CHAIR BRUCH: Nate.

2 SECRETARY LEWIS: No.

3 NOSB CHAIR BRUCH: Cat is absent. And the Chair
4 votes yes.

5 SECRETARY LEWIS: Six yes, five no, one
6 abstention, zero recusals, three absent; the motion fails.

7 NOSB VICE CHAIR JOHNSON: Thank you. All right.

8 SECRETARY LEWIS: And --

9 NOSB VICE CHAIR JOHNSON: So -- oh.

10 SECRETARY LEWIS: My audio on that last vote
11 count, was it clear?

12 NOSB VICE CHAIR JOHNSON: I think so.

13 SECRETARY LEWIS: Okay.

14 NOSB CHAIR BRUCH: It was more clear.

15 NOSB VICE CHAIR JOHNSON: Yeah.

16 NOSB CHAIR BRUCH: And it could have been my
17 misstep there of not calling you, and your voice wasn't
18 heard because I didn't actually call you, but your voice is
19 coming in now --

20 SECRETARY LEWIS: Okay.

21 NOSB CHAIR BRUCH: -- very clear.

22 SECRETARY LEWIS: We just got a comment about the
23 volume, but it seems like that's --

24 NOSB CHAIR BRUCH: Got it.

25 SECRETARY LEWIS: -- why they did some

1 adjustments, so great.

2 NOSB CHAIR BRUCH: Yeah. Amanda is a little in
3 and out for me actually, if we're doing, kind of, a sound
4 check here. But other than that, I think we're coming in
5 clear. I see a little head nod by Michelle. Thank you.

6 Okay, back to you, Allison.

7 NOSB VICE CHAIR JOHNSON: All right, so purple
8 sweet potato juice color. In the past, it's been noted
9 there was an inadequate supply. The Subcommittee
10 unanimously supported relisting. A few certified operations
11 were reported to be using it, and no specific information
12 about commercial availability of the color was provided,
13 beyond there being organic purple sweet potatoes on the
14 market.

15 Discussion or comments on this one?

16 (No response.)

17 NOSB VICE CHAIR JOHNSON: All right, let's vote.

18 NOSB CHAIR BRUCH: All right, thank you, Allison.

19 There's a motion to remove purple sweet potato
20 juice color from the National List. It was motioned by
21 Allison, seconded by Kathryn, and we will start the voting
22 with Logan.

23 BD. MEM. PETRY LINKENHOGGER: (No response.)

24 NOSB CHAIR BRUCH: Absent. Corie.

25 BD. MEM. PIERCE: Yes.

1 NOSB CHAIR BRUCH: Franklin.
2 BD. MEM. QUARCOO: Yes.
3 NOSB CHAIR BRUCH: Kyla.
4 BD. MEM. SMITH: No.
5 NOSB CHAIR BRUCH: Javier.
6 BD. MEM. ZAMORA: (No response.)
7 NOSB CHAIR BRUCH: Absent. Brian.
8 BD. MEM. CALDWELL: No.
9 NOSB CHAIR BRUCH: Kathryn.
10 BD. MEM. DESCHENES: No.
11 NOSB CHAIR BRUCH: Carolyn?
12 BD. MEM. DIMITRI: Yes.
13 NOSB CHAIR BRUCH: Amanda.
14 BD. MEM. FELDER: No.
15 NOSB CHAIR BRUCH: Andrea.
16 BD. MEM. HATZIYANNIS: No.
17 NOSB CHAIR BRUCH: Allison.
18 NOSB VICE CHAIR JOHNSON: Yes.
19 NOSB CHAIR BRUCH: Nate.
20 SECRETARY LEWIS: No.
21 NOSB CHAIR BRUCH: Cat.
22 BD. MEM. McCLUSKY: (No response.)
23 NOSB CHAIR BRUCH: Absent. Dilip.
24 BD. MEM. NANDWANI: No.
25 NOSB CHAIR BRUCH: And the Chair votes yes.

1 SECRETARY LEWIS: Five yes, seven no, zero
2 abstentions, zero recusals, three absent; the motion fails.

3 NOSB VICE CHAIR JOHNSON: Thank you.

4 All right, red cabbage extract color. In the
5 past, there was reported to be an inadequate supply. The
6 subcommittee vote was split, one for delisting, five for
7 relisting. Multiple certifiers reported having a small
8 number of certified operations using it, and there was no
9 specific information provided about commercial availability
10 of the color beyond there being organic red cabbage on the
11 market.

12 Comments or discussion? Brian.

13 BD. MEM. CALDWELL: Yeah, thanks, Allison.

14 I struggle with this because I'm sure there is a
15 ton of red cabbage -- organic red cabbage available, but I'm
16 assuming in all of this that essentially, if you are growing
17 red cabbage and you're selling it for color extract, that's
18 a very low-cost market, and I just don't think that our U.S.
19 growers will want to go there. But I --

20 Does anybody else have thoughts about that? But
21 that seems to be the way I would expect the supply to be
22 very low because of that.

23 NOSB VICE CHAIR JOHNSON: Yeah, it's an important
24 point, and I think tricky to figure out. You know, all of
25 these have a bit of a chicken-and-the-egg problem. For many

1 of them, I think it's clear that as long as the less
2 expensive non-organic option remains available as a choice,
3 there's not much incentive for a farmer to use it, and it's
4 not that hard to come up with a reason to justify buying the
5 non-organic one.

6 My thinking in approaching all of these is that
7 there were comments about the feasibility, so it is possible
8 to grow these crops organically. It doesn't take that long
9 to bring them online, so if the non-organic option is
10 removed and there is demand for it, it's possible to meet
11 that demand. But I agree, it's a tricky balance.

12 Carolyn, I saw your hand go up and then down.

13 BD. MEM. DIMITRI: I mean, I just have a thought,
14 and I don't really know how productive it is, but it's
15 extremely difficult to make these decisions because you
16 don't really know anything about actual market demand and
17 actual market supply. And -- or, like, can you use purple
18 sweet potato juice? Like, how does it work? Are there
19 substitutes for it? But I think your basic argument,
20 Allison, is a sound one, that unless there is a need for
21 these products in the market, they just are not going to
22 emerge. Or the market won't emerge.

23 NOSB VICE CHAIR JOHNSON: Yeah. And there was
24 information in the TR about, sort of, like, comparisons and
25 where you might substitute one or the other, but I think the

1 thrust of the comments is, you know, it's hard to get
2 exactly the right color. You have more options if you have
3 more colors to choose from.

4 I meant to share at the outset, I mentioned this
5 yesterday, I polled my 6-year-old yesterday morning before
6 the meeting: okay, if you had to pick no color or a color
7 grown with harmful chemicals, which would you choose? And
8 she said, no color. She loves colors. She wants to put
9 food dye in her breakfast every morning, so I was proud of
10 her making that call. For what it's worth.

11 It -- you know, there's the -- a consumer
12 expectation around color that is reinforced by the colors
13 continuing to look the way that they do. It's hard to say
14 how if -- how adaptable consumers really are, but I think
15 we're quite adaptable coming from that perspective on the
16 board.

17 Amy, go ahead.

18 NOSB CHAIR BRUCH: Allison, that's pretty
19 impressive. Again, how old is your daughter?

20 NOSB VICE CHAIR JOHNSON: She's six going, who
21 knows, 16.

22 NOSB CHAIR BRUCH: Yeah. Sounds like a future
23 board member, perhaps.

24 Yeah, I think, I mean, just maybe a recommendation
25 for the next time these are reviewed is, I'd love a little

1 bit of insight in the manufacturing process because, you
2 know, from a production standpoint, I'm pretty confident
3 that, you know, there -- there can be or could be enough
4 base material. I just thinking in general, producers here
5 may be overproducing based on the market needs in some
6 cases, but I'd just like to understand that ratio of
7 approximately how much base material would be needed, you
8 know, to convert into, you know, a meaningful volume of
9 these extracts. I would have to say it's probably very
10 much. A little goes a long ways. But I think just maybe a
11 note that could be embedded in the next review I think that
12 would be helpful for additional deliberation.

13 NOSB VICE CHAIR JOHNSON: Yeah. And that was, as
14 I mentioned, a comment that we got as well, that the next TR
15 could drill down a little bit more. The last TR looked at
16 all the colors that were on the list at the time, so it
17 doesn't go super deep. But I think, as this list gets
18 smaller, it becomes doable to get into a little bit more of
19 the specifics for each of these, and that would be really
20 helpful.

21 BD. MEM. NANDWANI: Excellent. Thank you.

22 NOSB VICE CHAIR JOHNSON: Any more discussion on
23 red cabbage extract color?

24 (No response.)

25 NOSB VICE CHAIR JOHNSON: All right, let's move to

1 our vote.

2 NOSB CHAIR BRUCH: Okay, Allison, excellent.

3 There's a motion to remove red cabbage extract
4 color from the National List. Motioned by Allison, seconded
5 by Kyla. And the voting will start with Corie.

6 BD. MEM. PIERCE: Yes.

7 NOSB CHAIR BRUCH: Franklin.

8 BD. MEM. QUARCOO: Yes.

9 NOSB CHAIR BRUCH: Kyla.

10 BD. MEM. SMITH: No.

11 NOSB CHAIR BRUCH: Javier.

12 BD. MEM. ZAMORA: (No response.)

13 NOSB CHAIR BRUCH: Absent. Brian.

14 BD. MEM. CALDWELL: Yes.

15 NOSB CHAIR BRUCH: Kathryn.

16 BD. MEM. DESCHENES: No.

17 NOSB CHAIR BRUCH: Carolyn.

18 BD. MEM. DIMITRI: Yes.

19 NOSB CHAIR BRUCH: Amanda.

20 BD. MEM. FELDER: No.

21 NOSB CHAIR BRUCH: Andrea.

22 BD. MEM. HATZIYANNIS: No.

23 NOSB CHAIR BRUCH: Allison.

24 NOSB VICE CHAIR JOHNSON: Yes.

25 NOSB CHAIR BRUCH: Nate.

1 SECRETARY LEWIS: No.

2 NOSB CHAIR BRUCH: Cat.

3 BD. MEM. McCLUSKY: (No response.)

4 NOSB CHAIR BRUCH: Absent. Dilip.

5 BD. MEM. NANDWANI: Yes.

6 NOSB CHAIR BRUCH: Logan.

7 BD. MEM. PETRY LINKENHOGGER: (No response.)

8 NOSB CHAIR BRUCH: Absent. And the Chair votes
9 yes.

10 SECRETARY LEWIS: Let's see, we've got seven yes,
11 five no, zero abstentions, zero recusals, three absent. And
12 someone help me with the math here. Michelle, can I phone a
13 friend? Is seven out of 12, more than two-thirds?

14 MS. ARSENAULT: The motion fails. With 12, we
15 need eight.

16 SECRETARY LEWIS: Okay, one vote short. So very
17 close, but the motion fails. Did not meet the two-thirds
18 majority needed for passing recommendation from the Board.

19 NOSB VICE CHAIR JOHNSON: Thank you.

20 All right, nearing the end. Red radish extract
21 color. There's previously been mixed information on the
22 supply for this color. The Subcommittee unanimously
23 supported relisting. A few certified operations were
24 reported to be using it. No specific information was
25 provided about the commercial availability as it stands now,

1 beyond there being organic radishes on the market.

2 Discussion or questions?

3 (No response.)

4 NOSB VICE CHAIR JOHNSON: All right, let's vote.

5 NOSB CHAIR BRUCH: All right, thank you, Allison.

6 Motion to remove red radish extract color from the
7 National List. Motioned by Allison, seconded by Kyla. The
8 voting will start with Franklin.

9 BD. MEM. QUARCOO: Yes.

10 NOSB CHAIR BRUCH: Kyla.

11 BD. MEM. SMITH: No.

12 NOSB CHAIR BRUCH: Javier.

13 BD. MEM. ZAMORA: (No response.)

14 NOSB CHAIR BRUCH: Absent. Brian.

15 BD. MEM. CALDWELL: Yes.

16 NOSB CHAIR BRUCH: Kathryn.

17 BD. MEM. DESCHENES: No.

18 NOSB CHAIR BRUCH: Carolyn.

19 BD. MEM. DIMITRI: Yes.

20 NOSB CHAIR BRUCH: Amanda.

21 BD. MEM. FELDER: No.

22 NOSB CHAIR BRUCH: Andrea.

23 BD. MEM. HATZIYANNIS: No.

24 NOSB CHAIR BRUCH: Allison.

25 NOSB VICE CHAIR JOHNSON: Yes.

1 NOSB CHAIR BRUCH: Nate.
2 SECRETARY LEWIS: No.
3 NOSB CHAIR BRUCH: Cat.
4 BD. MEM. McCLUSKY: (No response.)
5 NOSB CHAIR BRUCH: Absent. Dilip.
6 BD. MEM. NANDWANI: Yes.
7 NOSB CHAIR BRUCH: Logan.
8 BD. MEM. PETRY LINKENHOGGER: (No response.)
9 NOSB CHAIR BRUCH: Absent. Corie.
10 BD. MEM. PIERCE: Yes.
11 NOSB CHAIR BRUCH: And the Chair votes yes.
12 SECRETARY LEWIS: Seven yes, five no, zero
13 abstentions, zero recusals, three absent; the motion fails.
14 NOSB VICE CHAIR JOHNSON: All right. thank you.
15 Down to our last one, saffron extract color. I
16 have been growing saffron in my garden and have an immense
17 appreciation for how expensive this spice is. It's so hard
18 to harvest.
19 In the past, there's been mixed information on
20 supply. The Subcommittee vote was split, one for delisting,
21 four for relisting, one abstention. No certifiers reported
22 use, and several certifiers reporting -- reported having no
23 certified operations using it, so no one is using this that
24 we know of. No specific information was provided about the
25 current commercial availability beyond there being organic

1 saffron on the market.

2 Discussion? Questions?

3 (No response.)

4 NOSB VICE CHAIR JOHNSON: All right, last vote.

5 NOSB CHAIR BRUCH: Thanks, Allison.

6 Motion to remove saffron extract color from the
7 National List. Motioned by Allison, seconded by Dilip.

8 Voting starts with Kyla.

9 BD. MEM. SMITH: No.

10 NOSB CHAIR BRUCH: Javier.

11 BD. MEM. ZAMORA: (No response.)

12 NOSB CHAIR BRUCH: Absent. Brian.

13 BD. MEM. CALDWELL: Yes.

14 NOSB CHAIR BRUCH: Kathryn.

15 BD. MEM. DESCHENES: Yes.

16 NOSB CHAIR BRUCH: Carolyn.

17 BD. MEM. DIMITRI: (No response.)

18 NOSB CHAIR BRUCH: Carolyn?

19 BD. MEM. DIMITRI: I said yes. I'm sorry. I did
20 not speak loudly enough. Yes.

21 NOSB CHAIR BRUCH: That's okay. You can count on
22 me to re-ask.

23 Okay, Amanda.

24 BD. MEM. FELDER: No.

25 NOSB CHAIR BRUCH: Andrea.

1 BD. MEM. HATZIYANNIS: No.
2 NOSB CHAIR BRUCH: Allison?
3 NOSB VICE CHAIR JOHNSON: Yes.
4 NOSB CHAIR BRUCH: Nate.
5 SECRETARY LEWIS: No.
6 NOSB CHAIR BRUCH: Cat.
7 BD. MEM. McCLUSKY: (No response.)
8 NOSB CHAIR BRUCH: Absent. Dilip.
9 BD. MEM. NANDWANI: No.
10 NOSB CHAIR BRUCH: Logan.
11 BD. MEM. PETRY LINKENHOGGER: (No response.)
12 NOSB CHAIR BRUCH: Absent. Corie.
13 BD. MEM. PIERCE: Yes.
14 NOSB CHAIR BRUCH: Franklin.
15 BD. MEM. QUARCOO: Yes.
16 NOSB CHAIR BRUCH: And the Chair votes yes.
17 SECRETARY LEWIS: Seven yes, five no, zero
18 abstentions, zero recusals, three absent; the motion fails.
19 NOSB VICE CHAIR JOHNSON: All right, thank you for
20 the stellar calculating in real time there, Nate. That was
21 a lot of complex votes. And thank you all for the
22 discussion and thought about this. I think these split
23 votes signal the next round to take a close look at all
24 these materials again. Possibly request an updated TR that
25 really gets into any remaining technical barriers. And

1 hopefully also a market signal to those of you out there
2 looking for market opportunities; start busting out the
3 organic black/purple carrot juice color and making sure
4 people know about it.

5 All right, we have three remaining 606 materials,
6 so moving right along, next up is glycerin with Carolyn.

7 BD. MEM. DIMITRI: Okay, great. So glycerin is
8 one of the products that there seems to be, like, a fair
9 amount of support for removing from the list, and it has a
10 fairly long history.

11 I guess about 20 years ago, signals were sent that
12 it was going to be removed from the list, so supply ramped
13 up, and the product was not removed from the list. So there
14 were many public comments saying that there was sufficient
15 supply and quality, you know, that the market needs could be
16 met.

17 And there were a few comments that talked about,
18 well, what about livestock? We have got glycerin and
19 livestock, and they should be treated equally. And there
20 was one comment saying there was, like, uncertainty about
21 whether there was sufficient supply. And then the flavor
22 manufacturers were the ones that came out very strongly and
23 said they want it to be listed and basically pointed to the
24 fact that in Canada and the EU they have the same commercial
25 availability clause.

1 And I think that's pretty much all I have to say
2 about the product. Oh, it's mainly used in snacks and
3 wellness products. That's about 75 percent of the market.

4 I love when the public commenters give us little
5 information, and you can see, you know, where your glycerin
6 ends up. So I'm available for questions or comments.

7 NOSB VICE CHAIR JOHNSON: Thanks, Carolyn. Nate.

8 SECRETARY LEWIS: Yeah, I'm curious if the
9 glycerin question on 606 is similar to our cornstarch
10 conversation yesterday, where it's used as an ingredient in
11 certified organic products at such an amount that if it were
12 not allowed in organic form -- or sorry, if it wasn't
13 allowed on 606, we would have trouble with the organic
14 versions of these other things, I'm thinking, like, flavors,
15 perhaps colors, which we, you know, just went through,
16 because there's usually carriers; is that -- are we in a,
17 like, a certification -- what do you want to call that, a
18 rat's nest or something? It's -- or -- you know, a
19 certification boondoggle by removing this substance?

20 BD. MEM. DIMITRI: Well, none of the public
21 commenters alluded to that, whereas for corn starch, many
22 people brought up baking powder and talked about the
23 process.

24 SECRETARY LEWIS: Okay. Thanks. I appreciate --

25 BD. MEM. DIMITRI: It's possible that that's the

1 case.

2 SECRETARY LEWIS: Okay, thanks. I'll also
3 acknowledge a comment that I read that wanted to, sort of,
4 dispel a correlation between non-organic glycerin and
5 rainforest deforestation because of the palm industry, like,
6 there might be some correlation there, but, like,
7 conventional glycerin does not necessarily mean, you know,
8 rainforest deforestation. So I just want to be -- as we,
9 sort of, assess environmental impacts about these 606
10 materials, I want to be careful that we're making accurate
11 causation statements, as opposed to, sort of, you know,
12 making assumptions about what the end result of these
13 products are.

14 BD. MEM. DIMITRI: I -- that's really why I didn't
15 mention the palm oil connection, because, you know -- well,
16 you know, I don't think -- I think of public comments as,
17 like, a limited amount of evidence. And so we don't really
18 have clear evidence, but glycerin can come from soy, canola,
19 sunflower seed, and flaxseed, as well as, you know, palm
20 oil.

21 NOSB VICE CHAIR JOHNSON: Thank you. It's
22 helpful.

23 Amanda, go ahead.

24 BD. MEM. FELDER: Yeah. So I'm really skeptical
25 about this material coming off the list. I have a lot of

1 experience with glycerin. We know that a lot of glycerin's
2 come in from soy, which is a high fraud-risk product.
3 Most -- and no public comment came out, because I brought
4 this up in the spring meeting, of from what I have found,
5 all of the glycerin production is coming out of India, which
6 is a high-risk country for fraud. And it is, by testing,
7 impossible to tell the difference between synthetically
8 manufactured and non-synthetically manufactured glycerin,
9 which could still come from soy. Same ingredients. So
10 unless you're watching the actual manufacturing process,
11 it's really hard to discern fraud.

12 So I'm really uncomfortable taking this off of the
13 606 list because we removed it from 205 as a synthetic
14 option from 605, and so, if we only allow organic production
15 and we find again, in India, that there's issues, and now
16 there is no organic glycerin available, now there's no
17 source for glycerin options for any manufacturer at that
18 point. So I feel like all of our eggs are in one basket for
19 this particular ingredient. And the manufacturers that
20 commented that they have availability and that they could
21 ramp up production, they were all based in India. And so it
22 doesn't make me feel any better and more confident in this
23 ingredient when this is all coming from one area that's high
24 risk on multiple fronts. Makes me not confident taking this
25 off.

1 NOSB VICE CHAIR JOHNSON: Thanks, Amanda. That's
2 helpful context. Do you think an incentive in the market,
3 like a guaranteed market for organic glycerin, could spur
4 domestic production? Or that organic soy producers in the
5 U.S. who are worried about export markets now might see this
6 as an opportunity?

7 BD. MEM. FELDER: No, I'm not familiar enough with
8 the production process of if there's -- if it's just because
9 the ingredients are better in an area, or if it's labor, or
10 if it's -- I don't know what the rationale of manufacturing
11 not being in the U.S. or in a non-high-fraud area is, so I
12 don't know. If we had more information on that, then it
13 would make me feel a little bit better, but nobody provided
14 more context outside of those bits that I've already -- that
15 I know, you know.

16 NOSB VICE CHAIR JOHNSON: Okay, thank you.
17 Amy.

18 NOSB CHAIR BRUCH: Yeah, I mean, I was just going
19 to highlight the capacity and capability of soy. It is an
20 integral crop for organic producers, and we're learning more
21 and more about it. And, like I, kind of, said in my Chair
22 speech, over the years, I got a lot of confidence at growing
23 soybeans, and I am really trying to be a mentor in the
24 Midwest for others to grow this. It's a huge rotational
25 crop for Midwest producers. In the conventional space, we

1 know the benefits of that, but in the organic space, it is
2 as well. It's just one thing, it's wonderful because it
3 contributes nitrogen back to the soil, too. So it's a
4 part -- it's a needed part of a complementary rotation that
5 row crop producers need to do for organics.

6 There's a lot of innovation, and I'm telling you,
7 the mechanization is necessary to grow row crops. Soybeans,
8 in particular, there's 250,000 plants usually we plant per
9 acre, so it's not a crop that can be managed by hand very
10 efficiently, let's say, because you -- it's a -- you need a
11 lot of acres. So 1 acre of 250,000 plants is a mind-blowing
12 thing to think you can do with hand labor.

13 And Allison mentioned the comments about
14 harvesting saffron by hand. I can't even imagine the
15 efficiency factor of harvesting just one acre of soybeans of
16 250,000 plants to make a go at it. So, to me, we need
17 additional attention in the row crops -- organic row crops
18 in the Midwest. I think we need market options, market
19 opportunities, not only in organics, but in conventional
20 corn and soy, as well. And so every opportunity that there
21 is for additional digestive mechanisms for corn and soy, we
22 need to embrace those, whether it's conventional markets or
23 organic. So I'm in favor of really investigating this
24 further. I'm confident that the U.S. can rise to the
25 challenge of producing quality, low-cost options for

1 soybeans that have real integrity.

2 So that's my passion speech there, but thank you
3 for teeing that up, Amanda. I really appreciate your
4 insight there on the state of the market as it currently
5 exists, too. So thanks.

6 NOSB VICE CHAIR JOHNSON: Thanks, Amy.

7 Carolyn, go ahead.

8 BD. MEM. DIMITRI: I think, just to follow up on
9 that, like, I don't think that -- I do believe that U.S.
10 farmers can provide the soy, canola, sunflower, and flax
11 that is needed for this. And then the question is, like,
12 will a processing facility, you know, be willing to, like,
13 take up shop somewhere in the Midwest? And I would think
14 it's more likely to if, you know, they know that there's a
15 market for the organic glycerin. So I think, you know,
16 you -- we have to look at the whole supply chain.

17 Yes, the farmers can do it. Why would a processor
18 do it if they think they're going to be competing with, you
19 know, international imports?

20 Anyway, I think we can send a signal that it's
21 time for us to think about getting some of these done
22 domestically. Thank you.

23 NOSB VICE CHAIR JOHNSON: Thanks, Carolyn.

24 Amy, did you have something else?

25 NOSB CHAIR BRUCH: No. Well done, Dr. Dimitri.

1 NOSB VICE CHAIR JOHNSON: Okay. Anything else on
2 this one before we vote?

3 (No response.)

4 NOSB VICE CHAIR JOHNSON: All right, Amy, over to
5 you.

6 NOSB CHAIR BRUCH: All right, there is a motion to
7 remove glycerin from the National List. It was motioned by
8 Carolyn, seconded by Kyla. We will be starting the voting
9 with Javier.

10 BD. MEM. ZAMORA: (No response.)

11 NOSB CHAIR BRUCH: Absent. Brian.

12 BD. MEM. CALDWELL: Yes.

13 NOSB CHAIR BRUCH: Kathryn.

14 BD. MEM. DESCHENES: No.

15 NOSB CHAIR BRUCH: Carolyn.

16 BD. MEM. DIMITRI: Yes.

17 NOSB CHAIR BRUCH: Amanda.

18 BD. MEM. FELDER: No.

19 NOSB CHAIR BRUCH: Andrea.

20 BD. MEM. HATZIYANNIS: No.

21 NOSB CHAIR BRUCH: Allison.

22 NOSB VICE CHAIR JOHNSON: Yes.

23 NOSB CHAIR BRUCH: Nate.

24 SECRETARY LEWIS: No.

25 NOSB CHAIR BRUCH: Cat.

1 BD. MEM. McCLUSKY: (No response.)
2 NOSB CHAIR BRUCH: Absent. Dilip.
3 BD. MEM. NANDWANI: No.
4 NOSB CHAIR BRUCH: Logan.
5 BD. MEM. PETRY LINKENHOGGER: (No response.)
6 NOSB CHAIR BRUCH: Absent. Corie.
7 BD. MEM. PIERCE: Yes.
8 NOSB CHAIR BRUCH: Franklin.
9 BD. MEM. QUARCOO: No.
10 NOSB CHAIR BRUCH: Kyla.
11 BD. MEM. SMITH: No.
12 NOSB CHAIR BRUCH: And the Chair votes yes.
13 SECRETARY LEWIS: Just for the record, Amy, Javier
14 is absent.
15 NOSB CHAIR BRUCH: Okay. Yeah. Did I say absent?
16 Sorry. Going back to -- he started us off.
17 SECRETARY LEWIS: You just skipped over the Javier
18 question.
19 NOSB CHAIR BRUCH: Okay.
20 SECRETARY LEWIS: But just for the --
21 NOSB CHAIR BRUCH: Got it.
22 SECRETARY LEWIS: -- just to make sure the
23 record's clear.
24 NOSB CHAIR BRUCH: Yep. I called him, but I
25 didn't confirm "absent." Thank you for circling back.

1 SECRETARY LEWIS: We have five yes, seven no, zero
2 abstentions, zero recusals, three absent; the motion fails.

3 NOSB VICE CHAIR JOHNSON: Thank you, Nate and Amy.
4 All right, moving right along, Carolyn, I think
5 this might be your last Sunset.

6 BD. MEM. DIMITRI: Yeah. We're going to have a
7 party.

8 NOSB VICE CHAIR JOHNSON: Inulin-oligofructose
9 enriched. What material to go out on.

10 BD. MEM. DIMITRI: Okay. Yes, it's a good
11 material to go out on.

12 I would say -- what do I have to say about this?
13 I was so focused on glycerin and cornstarch, I didn't think
14 very much about this. I would say that this has, like, a
15 little bit of a history, where, as we mentioned in the write
16 up and for the last Sunset, where it was voted off the Board
17 and then -- it was voted off by the Board, and then the
18 industry petitioned the NOP and they realized there was,
19 like, a miscommunication about the product that they were --
20 that the Board thought it was, voting off the list.

21 So here there's just pretty much good support for
22 keeping the product on the list at this moment. The only
23 comment that was -- different comment was that it should be
24 classified as a synthetic nonagricultural product because of
25 what happens to it through the fermentation process, which,

1 I guess, a future board can take up.

2 NOSB VICE CHAIR JOHNSON: Thanks, Carolyn.

3 Discussion? Questions?

4 (No response.)

5 NOSB VICE CHAIR JOHNSON: All right, let's take it
6 to a vote.

7 NOSB CHAIR BRUCH: Okay, there's a motion to
8 remove inulin-oligofructose enriched from the National List,
9 motioned by Carolyn, seconded by Dilip. We'll start the
10 voting with Brian.

11 BD. MEM. CALDWELL: No.

12 NOSB CHAIR BRUCH: Kathryn.

13 BD. MEM. DESCHENES: No.

14 NOSB CHAIR BRUCH: Carolyn.

15 BD. MEM. DIMITRI: No.

16 NOSB CHAIR BRUCH: Amanda.

17 BD. MEM. FELDER: No.

18 NOSB CHAIR BRUCH: Andrea.

19 BD. MEM. HATZIYANNIS: No.

20 NOSB CHAIR BRUCH: Allison.

21 NOSB VICE CHAIR JOHNSON: No.

22 NOSB CHAIR BRUCH: Nate.

23 SECRETARY LEWIS: No.

24 NOSB CHAIR BRUCH: Cat.

25 BD. MEM. McCLUSKY: (No response.)

1 NOSB CHAIR BRUCH: Absent. Dilip.

2 BD. MEM. NANDWANI: No.

3 NOSB CHAIR BRUCH: Logan.

4 BD. MEM. PETRY LINKENHOGGER: (No response.)

5 NOSB CHAIR BRUCH: Absent. Corie.

6 BD. MEM. PIERCE: No.

7 NOSB CHAIR BRUCH: Franklin.

8 BD. MEM. QUARCOO: No.

9 NOSB CHAIR BRUCH: Kyla.

10 BD. MEM. SMITH: No.

11 NOSB CHAIR BRUCH: Javier.

12 BD. MEM. ZAMORA: (No response.)

13 NOSB CHAIR BRUCH: Absent. And the Chair votes
14 no.

15 SECRETARY LEWIS: Zero yes, 12 no, zero
16 abstentions, zero recusal, three absent; the motion fails.

17 NOSB CHAIR BRUCH: All right. One announcement
18 here. Allison, why don't we plan on finishing up Handling
19 here? We got one more Sunset and then we will all break
20 after that for a short break.

21 NOSB VICE CHAIR JOHNSON: Sounds good. Thank you.

22 All right, now, Kyla's last Sunset ever until you
23 rejoin the board again in your future life, orange shellac.

24 BD. MEM. SMITH: Okay, orange shellac is listed at
25 205.606(n). It is used as a -- this is another fruit

1 coating, so fruit coating or vegetable coating to help
2 reduce water loss and retain firmness. It's also used, or
3 can be used, as an ingredient in lozenges, capsules, and
4 tablets, as well as confectionery glazes on candies,
5 chocolates, and coffee beans. I would say most commenters
6 were in support of relisting, noting essentiality. Again,
7 we talked about this yesterday with the other coatings
8 around the usefulness of having more than one coating
9 available, and they do use them in rotation.

10 One commenter suggested an annotation limiting
11 ancillaries, as well as other labeling requirements. And we
12 did address those -- that -- both of those items because
13 they came up in the spring. In the fall write up we did
14 talk about both of those at the Subcommittee, and we
15 believed that the identification of waxes on fruit is a
16 larger FDA issue. We recognized that it could be
17 misinterpreted in the market where, if it was required on --
18 to be labeled organic fruit to have that labeling aspect,
19 consumers may not understand that just because the
20 nonorganic fruit didn't include that, that didn't
21 necessarily mean that they didn't have a coating or wax on
22 them; it was just not required of them to be labeled as
23 such. And as for the ancillaries, we also had stated in the
24 write up that we agreed that additional information can be
25 sought out during the next TR, and the new TR templates

1 incorporate more information on ancillaries.

2 Another commenter indicated that the Board should
3 consider pesticide use in nonorganic production of the host
4 species, which again is the hardened secretion from a
5 parasitic insect popularly known as the lac insect, and
6 looking at the potential availability of organic orange
7 shellac. However, the Subcommittee did agree with the
8 commenter, where they had stated that it appears that
9 pesticide use is very low on those host trees that the
10 insect sucks the sap of to then excrete the secretion. But
11 again, this can be an area of further focus in a future TR.

12 So all in all, in general, there was support from
13 most stakeholders about relisting this material. I'll take
14 questions.

15 NOSB VICE CHAIR JOHNSON: Thanks, Kyla. And yeah,
16 since it's a bug, the organic supply could not be available
17 until we have rules for organic bug husbandry.

18 Comments? Discussion?

19 (No response.)

20 NOSB VICE CHAIR JOHNSON: All right, let's vote.

21 NOSB CHAIR BRUCH: All right, there's a motion to
22 remove orange shellac from the National List. It was
23 motioned by Kyla, seconded by Amanda. We'll start the
24 voting with Kathryn.

25 BD. MEM. DESCHENES: No.

1 NOSB CHAIR BRUCH: Carolyn.
2 BD. MEM. DIMITRI: (No response.)
3 NOSB CHAIR BRUCH: Carolyn?
4 BD. MEM. DIMITRI: No.
5 NOSB CHAIR BRUCH: Okay, thank you. Amanda.
6 BD. MEM. FELDER: No.
7 NOSB CHAIR BRUCH: Andrea.
8 BD. MEM. HATZIYANNIS: No.
9 NOSB CHAIR BRUCH: Allison.
10 NOSB VICE CHAIR JOHNSON: No.
11 NOSB CHAIR BRUCH: Nate.
12 SECRETARY LEWIS: No.
13 NOSB CHAIR BRUCH: Cat.
14 BD. MEM. McCLUSKY: (No response.)
15 NOSB CHAIR BRUCH: Absent. Dilip.
16 BD. MEM. NANDWANI: No.
17 NOSB CHAIR BRUCH: Logan.
18 BD. MEM. PETRY LINKENHOGGER: (No response.)
19 NOSB CHAIR BRUCH: Absent. Corie.
20 BD. MEM. PIERCE: (No response.)
21 MS. ARSENAULT: It looks like we lost Corie.
22 NOSB CHAIR BRUCH: Did we lose Corie? Okay, thank
23 you, Michelle, for letting me know that.
24 Okay, Corie, absent. Franklin.
25 BD. MEM. QUARCOO: No.

1 NOSB CHAIR BRUCH: Kyla.

2 BD. MEM. SMITH: No.

3 NOSB CHAIR BRUCH: Javier.

4 BD. MEM. ZAMORA: (No response.)

5 NOSB CHAIR BRUCH: Absent. Brian.

6 BD. MEM. CALDWELL: No.

7 NOSB CHAIR BRUCH: And the Chair votes no.

8 SECRETARY LEWIS: Zero yes, 11 no, zero
9 abstentions, zero recusal, four absent; the motion fails.

10 NOSB VICE CHAIR JOHNSON: All right. Thank you
11 for sticking through that long list of Sunsets and the great
12 work by everyone on the Subcommittee to prepare, and the
13 excellent discussion here. And handling some elaborate
14 voting there, Amy and Nate. Really appreciate you all.

15 And just a special thanks to Carolyn, Kyla, and
16 Logan, our outgoing Subcommittee members; we will miss you
17 very much, but excited for the new Crop coming up.

18 Back to you, Amy.

19 NOSB CHAIR BRUCH: Okay, Allison, thank you so
20 much for your leadership on Handling. We got an outsized
21 Work Agenda, and your schedule management is so diligent.
22 Really appreciate all your contributions there and keeping
23 the Subcommittee very organized for all of the materials you
24 guys deliberate on. So thank you so much.

25 We are going to take a break. We'll return at 30

1 past the hour, so right at the midway point here. That'll
2 give everybody about eight minutes. And we will then return
3 and begin on Livestock Subcommittee. Thank you. Really
4 appreciate it.

5 (Whereupon, a brief recess was taken.)

6 NOSB CHAIR BRUCH: All right, welcome back.
7 Hopefully everybody had a good short break there. We are
8 going to transition now to the Livestock Subcommittee.

9 I apologize again; we're going to forego
10 icebreakers just because we want to make time and space for
11 the needed conversation here. Just a reminder to the Board
12 in this segment, remember the Sunset Summary Process for the
13 introduction just so we have enough time to deliberate on
14 the public comments and also make sure there's space for
15 questions.

16 I will turn the mic over to Brian here to lead us
17 in the Livestock Subcommittee, please.

18 BD. MEM. CALDWELL: Well, thanks, Amy. And by my
19 calculations, we have minus five minutes to go through the
20 Livestock Sunsets and decisions, so I'm going to pass on my
21 original icebreaker. Just suffice it to say that I've had
22 many, many really positive experiences over my, kind of,
23 long career with organic farming, and I'm grateful for all
24 of that.

25 So that having been said, let's move right along

1 into butorphanol with -- I believe that Corie is our
2 presenter. I think the slide can move ahead.

3 BD. MEM. PIERCE: Hi, everybody. I'm so sorry, I
4 literally just lost all my Internet, I had to drive to a new
5 location, so I'm scrambling here.

6 BD. MEM. CALDWELL: Oh.

7 BD. MEM. PIERCE: Pick up my notes? Yeah, I
8 dropped off. I don't know what happened, but I'm, sort of,
9 a little out of sorts.

10 BD. MEM. CALDWELL: Corie, we can come back to
11 yours if you want a few minutes?

12 BD. MEM. PIERCE: That might -- that would be
13 good. I think. I'm literally just unpacking in a new spot,
14 so that could be helpful.

15 BD. MEM. CALDWELL: oh, and I guess I should have
16 mentioned, as well, that we decided to move the oxytocin
17 annotation discussion until after the Sunsets were decided
18 so that if, for instance, oxytocin was taken off -- was
19 recommended to be taken off the list, then we wouldn't need
20 to change the annotation.

21 So that being said, let's move ahead. And Nate, I
22 believe you are going to look at flunixin.

23 SECRETARY LEWIS: Yeah, give me a second to get
24 organized here. I apologize for that.

25 BD. MEM. CALDWELL: Well, maybe I will tell you my

1 favorite moment in organic farming. And this was -- just
2 very quickly. In 1997, I went to a conference of Community
3 Supported Agriculture farmers in Pennsylvania. And the
4 thing that really, really made me happy was that there were
5 so many young people there. And CSA, for small-scale
6 producers here in the Northeast, really opened up a window
7 of opportunity. And there were all kinds of young couples
8 and babies, and it was -- it had been my, sort of,
9 generation or my cohort of growers from the '70s and '80s
10 where, thank God, being -- also increased and superseded by
11 a new generation, so that made me happy.

12 All right. Having said that, let's move ahead to
13 Nate.

14 SECRETARY LEWIS: All right, thanks, Brian.

15 So we're talking about flunixin. Great. Our
16 slide is current. Flunixin is listed at 205.603(a) as a
17 disinfectant, sanitizer and medical treatment, as
18 applicable. "Flunixin (CAS #-38677-85-9)-in accordance with
19 approved labeling; except that for use under 7 CFR Part 205,
20 the NOP requires a withdrawal period of at least two times
21 that required by FDA."

22 So this is one of our livestock drugs that
23 continues the trend and theme of organic livestock
24 production, where we double the withdrawal time typically.
25 And I know we've focused on that quite a bit, at least with

1 our conversation around meloxicam and various other
2 livestock drugs. Like, what's the most appropriate way to
3 develop language that supports that two times the typical
4 withdrawal period just to have double insurance that
5 consumers are not exposed to products that have any, sort
6 of, drug residues.

7 Flunixin is a analgesic and anti-inflammatory
8 drug. It's sold under the brand name Banamine, which is
9 probably what livestock producers are accustomed to calling
10 it. Typically, if all precautions are taken, there is no
11 harm to human health if it's applied to -- when it's used
12 with livestock agriculture.

13 Let's see, we didn't have any questions to
14 stakeholders' comments. The comments we received wholly
15 supported continuing its listing on the National List. And
16 the Subcommittee voted unanimously to keep it on the list,
17 citing that it remained necessary for livestock production
18 and met National List criteria.

19 BD. MEM. CALDWELL: All right, any questions for
20 Nate? Kathryn.

21 SECRETARY LEWIS: Go ahead, Kathryn.

22 BD. MEM. DESCHENES: I was just going to also note
23 that I had heard through stakeholders in the public comments
24 that aspirin can no longer be used, so it makes these pain
25 relief tools even more important. So there was an FDA

1 letter to veterinarians that made it clear that aspirin can
2 no longer be used.

3 SECRETARY LEWIS: Yeah, thanks, Kathryn. That was
4 perhaps -- you know, if we had gotten around to the
5 icebreakers on TOPP experiences from the last year in -- on
6 the Board, was the Livestock Subcommittee did hear from FDA
7 officials, and it was fascinating. And it's, sort of, like
8 my most repeated set of factoids recently, because it's like
9 FDA now apparently doesn't think aspirin does anything for
10 anybody, which I was like, wow, that's, kind of, earth
11 shattering. So, anyway, I don't want to get too ahead of my
12 skis on exactly the situation with aspirin. But yes, and
13 you're correct, that aspirin doesn't currently have any
14 approved uses for livestock agriculture and it -- that just,
15 sort of, raises some issues for its continued listing on our
16 National -- on the Organic National List. So, yes, having
17 pain relief measures is really important and further
18 underscored by, the sort, of uncertainty around aspirin and
19 whether or not it can continue to be used on livestock
20 operations.

21 BD. MEM. CALDWELL: Great. Any other questions?
22 (No response.)

23 BD. MEM. CALDWELL: Okay. Amy, I think we're
24 ready for a vote.

25 NOSB CHAIR BRUCH: Right. And thank you, Brian

1 and Nate. I appreciate we're not having the formalized
2 icebreaker moments, but, you know, communicating these
3 anecdotes is really important throughout, and I encourage
4 others to bring that up. But that was a good callout, Nate,
5 on the meeting that we did have in our breakout session with
6 Livestock with the FDA. It were really enlightening.

7 But without further ado, we don't see any
8 additional hands here, we'll go to the motion, which is to
9 remove flunixin from the National List. Motioned by Nate,
10 seconded by Brian. And we are going to start our voting
11 with Carolyn.

12 BD. MEM. DIMITRI: No.

13 NOSB CHAIR BRUCH: Amanda.

14 BD. MEM. FELDER: No.

15 NOSB CHAIR BRUCH: Andrea.

16 BD. MEM. HATZIYANNIS: No.

17 NOSB CHAIR BRUCH: Allison.

18 NOSB VICE CHAIR JOHNSON: No.

19 NOSB CHAIR BRUCH: Nate.

20 SECRETARY LEWIS: No.

21 NOSB CHAIR BRUCH: Cat.

22 BD. MEM. McCLUSKY: (No response.)

23 NOSB CHAIR BRUCH: Absent. Dilip.

24 BD. MEM. NANDWANI: No.

25 NOSB CHAIR BRUCH: Logan.

1 BD. MEM. PETRY LINKENHOGGER: (No response.)
2 NOSB CHAIR BRUCH: Absent. Corie.
3 BD. MEM. PIERCE: No.
4 NOSB CHAIR BRUCH: Franklin.
5 BD. MEM. QUARCOO: No.
6 NOSB CHAIR BRUCH: Kyla.
7 BD. MEM. SMITH: No.
8 NOSB CHAIR BRUCH: Javier.
9 BD. MEM. ZAMORA: (No response.)
10 NOSB CHAIR BRUCH: Absent. Brian.
11 BD. MEM. CALDWELL: No.
12 NOSB CHAIR BRUCH: Kathryn.
13 BD. MEM. DESCHENES: No.
14 NOSB CHAIR BRUCH: And the Chair votes no.
15 SECRETARY LEWIS: Zero yes, 12 no, zero
16 abstentions, zero recusals, three absent; the motion fails.
17 BD. MEM. CALDWELL: All right. Well, Nate, you're
18 up again --
19 SECRETARY LEWIS: Yeah.
20 BD. MEM. CALDWELL: -- for magnesium hydroxide.
21 SECRETARY LEWIS: All right. Magnesium hydroxide
22 is listed at 205.603, again as a disinfectant, sanitizer,
23 and medical treatment, as applicable. At Number 18,
24 "Magnesium hydroxide: federal law restricts this drug to use
25 by or on the lawful written or oral order of a licensed

1 veterinarian in full compliance with AMDUCA and 21 CFR Part
2 530 of the FDA regulations. Also, for use under 7 CFR Part
3 205, the NOP requires use by or on the lawful written order
4 of a licensed veterinarian."

5 Magnesium hydroxide, also referred to as milk of
6 magnesia, is used as an antacid for temporary relief of an
7 upset stomach and as a laxative for short-term relief of
8 constipation. It is generally considered environmentally
9 safe. The assessment is based on toxicology reports by CDC.
10 Generally, discussion was around it remaining necessary for
11 organic livestock production, and there's no new information
12 to indicate that it is causing any untoward effects on human
13 health and environment.

14 There continues to be questions about
15 synthetic/nonsynthetic classification of the various
16 manufacturing processes, which we did not dive into too
17 deeply in the Subcommittee, but just acknowledging that, and
18 recommending that there be a full Technical Report done for
19 this substance at its next Sunset Review. And again, that's
20 mostly around the -- you know, just making sure we're all --
21 as we -- you know, as we saw with L-malic acid, our
22 classification expertise evolves and sharpens as we mature
23 as an industry and as a Board, so just making sure that some
24 of these foundational materials are classified correctly
25 could be of good use of our time in the future.

1 But in general, the Subcommittee found it
2 compliant with the National List criteria, and recommended
3 it remain on the list.

4 Any questions?

5 BD. MEM. CALDWELL: Nate, just to be clear, so I
6 mean with this listing, either synthetic or nonsynthetic
7 magnesium hydroxide could be used, right?

8 SECRETARY LEWIS: Correct. Yeah.

9 BD. MEM. CALDWELL: Right. Okay.
10 (No response.)

11 BD. MEM. CALDWELL: Okay, I'm not seeing any
12 questions. Amy, I think we're ready for a vote.

13 NOSB CHAIR BRUCH: All right, thank you, Nate.
14 Thank you, Brian.

15 There's a motion to remove magnesium hydroxide
16 from the National List. Motioned by Nate, seconded by Amy.
17 Voting will start with Amanda.

18 BD. MEM. FELDER: No. No.

19 NOSB CHAIR BRUCH: Okay, thank you. Caught it the
20 second time.

21 Andrea.

22 BD. MEM. HATZIYANNIS: No.

23 NOSB CHAIR BRUCH: Allison.

24 NOSB VICE CHAIR JOHNSON: No.

25 NOSB CHAIR BRUCH: Nate.

1 SECRETARY LEWIS: No.
2 NOSB CHAIR BRUCH: Cat.
3 BD. MEM. McCLUSKY: (No response.)
4 NOSB CHAIR BRUCH: Absent. Dilip.
5 BD. MEM. NANDWANI: No.
6 NOSB CHAIR BRUCH: Logan.
7 BD. MEM. PETRY LINKENHOGGER: (No response.)
8 NOSB CHAIR BRUCH: Absent. Corie.
9 BD. MEM. PIERCE: No.
10 NOSB CHAIR BRUCH: Franklin.
11 BD. MEM. QUARCOO: No.
12 NOSB CHAIR BRUCH: Kyla.
13 BD. MEM. SMITH: No.
14 NOSB CHAIR BRUCH: Javier.
15 BD. MEM. ZAMORA: (No response.)
16 NOSB CHAIR BRUCH: Absent. Brian.
17 BD. MEM. CALDWELL: No.
18 NOSB CHAIR BRUCH: Kathryn.
19 BD. MEM. DESCHENES: No.
20 NOSB CHAIR BRUCH: Carolyn.
21 BD. MEM. DIMITRI: No.
22 NOSB CHAIR BRUCH: And the Chair votes no.
23 SECRETARY LEWIS: Zero yes, 12 no, zero
24 abstentions, zero recusal, three absent; the motion fails.
25 BD. MEM. CALDWELL: All right. So, Corie, it

1 looks like you're still looking for stuff, so should I go
2 ahead? We can do you right at the end if you want.

3 BD. MEM. PIERCE: Either way, I can be ready.

4 BD. MEM. CALDWELL: Okay, well, why don't we just
5 do butorphanol next, then, if that's all right?

6 BD. MEM. PIERCE: Yeah.

7 BD. MEM. CALDWELL: Thanks for recovering quickly
8 here.

9 BD. MEM. PIERCE: That was so weird.

10 Okay, so butorphanol is 205.603(a), as
11 disinfectant, sanitizer, and medical treatments, as
12 applicable. Butorphanol, so federal law restricts this drug
13 to be used by or on the lawful written or oral order of a
14 licensed vet in full compliance with AMDUCA, and the FDA
15 regulations and for use under 7 CFR part 205. And the NOP
16 requires, like I said, the licensed vet to administer or
17 written -- the meat withdrawal period of at least 42 days
18 after administering to livestock intended for meat
19 consumption or milk.

20 So this is a pre-op treatment for before major
21 emergency situations. It's an important -- it is an opiate.
22 It's a narcotic. It's a strong pain relief drug. It's
23 known to be very effective, and one of the few that works
24 the way it does, so fairly important to livestock producers.
25 It's -- you know, in the case of several of these drugs in

1 livestock production for organic, you know, we're thinking
2 about human health, we're thinking about environmental
3 health, and we're also thinking about animal welfare, and
4 the comments really are talking a lot about how this is an
5 important drug for the animal, really for the animal welfare
6 side of things.

7 The understanding is that -- that the -- I say the
8 comments, you know, are around, like, fully understanding
9 withholding periods. Like, is that enough for humans? And
10 environmentally it seems like it's fine, but from the
11 standpoint of for humans to be eating the meat and consuming
12 the dairy products, is the withdrawal period enough? But by
13 and large, you know, people recommend -- commenters wanted
14 to see this relisted. And in our Subcommittee
15 conversations, I think the animal welfare side of things is
16 really an important consideration for this. So that's where
17 our Subcommittee pretty much has landed, I'd say.

18 So, yeah, any questions?

19 BD. MEM. CALDWELL: (No audible response.)

20 MS. ARSENAULT: Brian, you're on mute.

21 BD. MEM. CALDWELL: Thank you.

22 Yeah, any questions?

23 (No response.)

24 BD. MEM. CALDWELL: I would just like to say that
25 the animal welfare component or facet of organic farming is

1 really important, and there are a very small number of tools
2 in the toolbox for pain management in organic veterinary
3 practice. So I just have to just reiterate that this is
4 really an important one.

5 And also the withdrawal periods, in this case they
6 don't say twice as long as the FDA, but these are -- I
7 think, they are calculated with that in mind. And so, the
8 withdrawal period, there's a reduction that is basically
9 multiplicative. So if, for instance, the reduction was 90
10 percent, so that only 10 percent of the original amount was
11 there after so many days, if you double that, 10 percent of
12 10 percent, or only 1 percent is going to be, you know,
13 present after doubling the time period. So the doubling of
14 the withdrawal period for organic is really a powerful
15 reduction in what the final consumer faces.

16 So anyways, that said, any more questions or
17 comments?

18 (No response.)

19 BD. MEM. CALDWELL: Amy, I think we're ready for a
20 vote.

21 NOSB CHAIR BRUCH: Okay. Thank you, Brian.
22 Thanks for the extra information there. And, Corie, thank
23 you for your presentation.

24 The motion is to remove butorphanol from the
25 National List. It was motioned by Corie, seconded by Nate.

1 We will start the voting with Andrea.

2 BD. MEM. HATZIYANNIS: No.

3 NOSB CHAIR BRUCH: Thank you. Allison.

4 NOSB VICE CHAIR JOHNSON: No.

5 NOSB CHAIR BRUCH: Nate.

6 SECRETARY LEWIS: No.

7 NOSB CHAIR BRUCH: Cat.

8 BD. MEM. McCLUSKY: (No response.)

9 NOSB CHAIR BRUCH: Absent. Dilip.

10 BD. MEM. NANDWANI: No.

11 NOSB CHAIR BRUCH: Logan.

12 BD. MEM. PETRY LINKENHOGGER: (No response.)

13 NOSB CHAIR BRUCH: Absent. Corie.

14 BD. MEM. PIERCE: No.

15 NOSB CHAIR BRUCH: Franklin.

16 BD. MEM. QUARCOO: No.

17 NOSB CHAIR BRUCH: Kyla.

18 BD. MEM. SMITH: No.

19 NOSB CHAIR BRUCH: Javier.

20 BD. MEM. ZAMORA: (No response.)

21 NOSB CHAIR BRUCH: Absent. Brian.

22 BD. MEM. CALDWELL: No.

23 NOSB CHAIR BRUCH: Kathryn.

24 BD. MEM. DESCHENES: No.

25 NOSB CHAIR BRUCH: Carolyn.

1 BD. MEM. DIMITRI: No.

2 NOSB CHAIR BRUCH: Amanda.

3 BD. MEM. FELDER: No.

4 NOSB CHAIR BRUCH: And the Chair votes no.

5 SECRETARY LEWIS: Zero yes, 12 no, zero
6 abstentions, zero recusal, three absent; the motion fails.

7 BD. MEM. CALDWELL: All right. Well, thank you so
8 much, Corie, for a quick recovery on that one and a good
9 presentation. Thank you.

10 Let's move to oxytocin for the slides, and I'm the
11 presenter for that one. Oxytocin, is a -- well, I'm not
12 sure where it's listed. I think it's probably under
13 205.603, once again, the same listing as other ones. It's a
14 hormone used after birth, and it's often used in the
15 treatment of a prolapsed uterus. The situation is one that
16 doesn't really happen very often, but it does happen, and so
17 it's an important part of that treatment process.

18 Okay, there we go. Yeah. And the current
19 annotation is for use in postpartum therapeutic
20 applications. And we're -- after we finish the Sunset
21 Reviews, we'll be talking about the oxytocin annotation,
22 which there's a proposal to change that. But for right now,
23 we're just going to go vote this, and then we will vote on
24 the annotation change separately.

25 Basically, the discussion over the years on this

1 material has been that it is a hormone. Organic labels like
2 to make the claim of hormone free, and basically what has
3 happened in the industry is that some of the large marketers
4 of particularly milk have not allowed oxytocin to be used in
5 their member operations or wherever they're buying from, so
6 they can make that label claim of hormone free. But in
7 general, besides that, the organic community mostly wants
8 that oxytocin to be an option for use in those specific
9 situations after birth.

10 And in terms of the comments that we received for
11 the fall meeting, there were basically seven for relisting,
12 mostly from larger livestock groups, and seven opposed,
13 which were mostly from individuals who were -- basically
14 gave the message that they were opposed, unless the
15 annotation was tightened. So we hope we can satisfy just
16 about everyone by doing the annotation change that's coming,
17 that we'll talk about in a few minutes, and I think we'll
18 just try to move forward with that.

19 Again, just to reiterate, that livestock welfare
20 is really important, and this is not some -- a situation
21 that happens often, but it needs to be -- we need to have
22 good, good treatment, full treatment methods for it when it
23 does happen.

24 So any questions about that? Comments?

25 (No response.)

1 BD. MEM. CALDWELL: All right, Amy, let's vote on
2 this one.

3 NOSB CHAIR BRUCH: Okay, thank you, Brian.

4 And just a reminder, we are voting on the listing
5 as is, and then we will loop around to do the annotation
6 vote later. So we -- there's a motion to remove oxytocin
7 from the National List. It was motioned by Brian, seconded
8 by Logan, and we will start the voting with Allison.

9 NOSB VICE CHAIR JOHNSON: No.

10 NOSB CHAIR BRUCH: Nate.

11 SECRETARY LEWIS: No.

12 NOSB CHAIR BRUCH: Cat.

13 BD. MEM. McCLUSKY: (No response.)

14 NOSB CHAIR BRUCH: Absent. Dilip.

15 BD. MEM. NANDWANI: No.

16 NOSB CHAIR BRUCH: Logan.

17 BD. MEM. PETRY LINKENHOGGER: (No response.)

18 NOSB CHAIR BRUCH: Absent. Corie.

19 BD. MEM. PIERCE: No.

20 NOSB CHAIR BRUCH: Franklin.

21 BD. MEM. QUARCOO: No.

22 NOSB CHAIR BRUCH: Kyla.

23 BD. MEM. SMITH: No.

24 BD. MEM. CALDWELL: Javier.

25 BD. MEM. ZAMORA: (No response.)

1 NOSB CHAIR BRUCH: Absent. Brian.

2 BD. MEM. CALDWELL: No.

3 NOSB CHAIR BRUCH: Kathryn.

4 BD. MEM. DESCHENES: No.

5 NOSB CHAIR BRUCH: Carolyn.

6 BD. MEM. DIMITRI: No.

7 NOSB CHAIR BRUCH: Amanda.

8 BD. MEM. FELDER: No.

9 NOSB CHAIR BRUCH: Andrea.

10 BD. MEM. HATZIYANNIS: No.

11 NOSB CHAIR BRUCH: And the Chair votes no.

12 SECRETARY LEWIS: Zero yes, 12 no, zero

13 abstentions, zero recusals, three absent; the motion fails.

14 BD. MEM. CALDWELL: All right. Thank you all.

15 And so now Amy is stepping in for Logan to talk
16 about poloxalene, and she's going to get her livestock hat
17 on here.

18 NOSB CHAIR BRUCH: Yes, I am. Thank you.

19 I've learned so much being a part of this
20 subcommittee, and we will start the review of poloxalene.
21 Poloxalene is located on 205.603, synthetic substance
22 allowed for use in organic livestock production as a
23 disinfectant, sanitizer, and medical treatment as
24 applicable. And the main use here, it's a fast-acting
25 synthetic material approved under organic regulations only

1 for emergency treatment of bloat in ruminants, such as
2 cattle and sheep. Poloxalene destabilizes foam and allows
3 gas to release from the rumen.

4 Some key points here to just highlight with this.
5 Essentially, it's an emergency animal welfare tool. It's
6 viewed by producers as an essential emergency treatment for
7 acute bloat. There is a narrow scope. It's clearly limited
8 to use, and it should not be widely or commonly used. It
9 must remain restricted to emergency treatment only. And
10 that was pretty resounding from public comments. There's a
11 lack of viable alternatives, according to producers. And
12 there is no commercially available nonsynthetic alternative.
13 There's a demonstrated but limited use, and use is rare, but
14 real.

15 And there were some comments about certifier
16 oversight being emphasized here. We need to make sure that
17 routine use should trigger certifier review. There were
18 some comments on pasture management. We didn't want this to
19 enable poor pasture management.

20 There was a comment that it's synthetic and
21 incompatible with organic systems and unnecessary given
22 preventative options. However, these opposition reviews
23 seem to be outweighed by the animal welfare considerations
24 in rare, life-threatening circumstances. And even those
25 somewhat opposed to relisting this could acknowledge the

1 emergency-use component argument.

2 Are there any questions with this substance? I
3 really appreciate the public comments on this one.

4 (No response.)

5 BD. MEM. CALDWELL: Amy, I think it's back to you
6 for a vote.

7 NOSB CHAIR BRUCH: Okay, thanks, Brian.

8 There's a motion to remove poloxalene from the
9 National List. It was motioned by Logan, seconded by Brian,
10 and we will start the voting with Nate.

11 SECRETARY LEWIS: No.

12 NOSB CHAIR BRUCH: Cat.

13 BD. MEM. McCLUSKY: (No response.)

14 NOSB CHAIR BRUCH: Absent. Dilip.

15 BD. MEM. NANDWANI: No.

16 NOSB CHAIR BRUCH: Logan.

17 BD. MEM. PETRY LINKENHOGGER: (No response.)

18 NOSB CHAIR BRUCH: Absent. Corie.

19 BD. MEM. PIERCE: No.

20 NOSB CHAIR BRUCH: Franklin.

21 BD. MEM. QUARCOO: No.

22 NOSB CHAIR BRUCH: Kyla.

23 BD. MEM. SMITH: No.

24 NOSB CHAIR BRUCH: Javier.

25 BD. MEM. ZAMORA: (No response.)

1 NOSB CHAIR BRUCH: Absent. Brian.
2 BD. MEM. CALDWELL: No.
3 NOSB CHAIR BRUCH: Kathryn.
4 BD. MEM. DESCHENES: No.
5 NOSB CHAIR BRUCH: Carolyn.
6 BD. MEM. DIMITRI: No.
7 NOSB CHAIR BRUCH: Amanda.
8 BD. MEM. FELDER: No.
9 NOSB CHAIR BRUCH: Andrea.
10 BD. MEM. HATZIYANNIS: No.
11 NOSB CHAIR BRUCH: Allison.
12 NOSB VICE CHAIR JOHNSON: No.
13 NOSB CHAIR BRUCH: And the Chair votes no.
14 SECRETARY LEWIS: Zero yes, 12 no, zero
15 abstentions, zero recusals, three absent; the motion fails.
16 BD. MEM. CALDWELL: Okay, now showing her wide
17 range of livestock issues, Amy is going to do formic acid,
18 as well.
19 NOSB CHAIR BRUCH: Okay. Thank you, Brian.
20 Oh, gosh. You should the lower the expectations
21 here. But anyway, I do appreciate the window into this
22 world, and this committee has helped me learn a lot with my
23 livestock counterparts, so this has been really enriching.
24 So this one is a little bit wide reaching. We're
25 looking at formic acid, and essentially this is a topical

1 treatment for external parasiticide or local anesthetic as
2 applicable for -- it's primarily used, I guess, for use as a
3 pesticide solely within honey bee hives. So this is really
4 interesting here, and it's deployed to control Varroa and
5 tracheal mites in honey bee hives.

6 I'm going to go -- just to highlight a few key
7 points here. Just a second. So, let's -- the community
8 highlighted its effectiveness, and it's an important tool.
9 These Varroa mites, they contribute significantly to honey
10 bee colony decline, and commenters emphasized that mite
11 pressure poses serious risk to pollination, crop reduction,
12 and beekeeping viability. It's limited but targeted. Its
13 use pattern, worker safety, and environmental considerations
14 were acknowledged.

15 Several commenters noted that it is synthetic, and
16 it could pose handling risk to beekeepers. It requires some
17 PPEs, and label adherence is important. It can cause acute
18 health risks if misused. However, EPA-reviewed data cited
19 by commenters indicated long low-term environmental
20 persistence. And then the lack of equally effective
21 alternatives; that was a theme coming out of public
22 comments.

23 As well as there's a strong call for apiculture
24 standards. So this is outside the framework of this
25 conversation, but currently there's an absence of formal NOP

1 apiculture rules, so it does pose the challenge of creating
2 inconsistency across certifiers. So there was a call from
3 the public with that. But many also acknowledged that it's
4 challenging for the apiculture standards to be developed
5 because bees can't fully be contained, and their foraging
6 cannot be fully controlled. So despite the concerns that I
7 reviewed earlier, commenters were supportive of relisting,
8 citing the urgency of mite control and the form of -- and
9 the role of formic acid in protecting pollinators.

10 BD. MEM. SMITH: Great. Thanks, Amy.

11 Any questions? Allison.

12 NOSB VICE CHAIR JOHNSON: Just one comment. I'm a
13 baby beekeeper, I was checking my mites yesterday, and I've
14 been trying to, you know, think about organic controls and
15 the, sort of, least toxic options, but I recently was at a
16 presentation via a prominent bee researcher who was looking
17 at the relationships between commercial bees and native
18 bees. And one thing that he said I found really compelling
19 and important for this material, and that's that the main
20 problem that commercial bees pose for wild bees is spreading
21 disease. There's, sort of, mixed science on whether they're
22 competing for food and resources, but the great weight of
23 the research shows that commercial bees do make wild bees
24 sick. So controlling illness in commercial bees is really
25 important for protecting our wild bee population.

1 So I took that to heart personally in how I think
2 about my hives, and I think this is one of the tools that's
3 useful for commercial beekeepers and among the less toxic
4 options. So in favor of keeping it.

5 BD. MEM. CALDWELL: Great. Thank you, Allison.

6 NOSB CHAIR BRUCH: Yeah, that's really --

7 BD. MEM. CALDWELL: Yeah. I'm going to --

8 NOSB CHAIR BRUCH: -- helpful and useful insight.

9 Oh, I was just going to say I'll add that to the
10 Sunset write-up because that's a good statement there.

11 BD. MEM. DESCHENES: Great. Yeah. And I just
12 want to add as well that -- I mean, we've all heard about
13 the extremely problem -- difficult situation that honey bees
14 have faced in the last, like, about 20 years or so, with
15 Colony Collapse Disorder, and Varroa mites contribute to
16 that. And if you are wondering what formic acid is, if you
17 ever disturb an ant hive and you smell that smell, that is
18 formic acid. So it's in nature, and it's -- it's quickly,
19 you know, decomposed in the environment, all that sort of
20 stuff.

21 So, any other questions or comments?

22 (No response.)

23 BD. MEM. CALDWELL: All right, Amy, back to you
24 for a vote.

25 NOSB CHAIR BRUCH: Excellent. Thank you, Brian.

1 Thanks for that. I was not aware of that. See? I'm
2 continuously learning, even today.

3 All right, motion -- the motion is to remove
4 formic acid from the National List. It was motioned by
5 Logan, seconded by Corie. We will start the voting with
6 Cat, who is absent. Dilip.

7 BD. MEM. NANDWANI: No.

8 NOSB CHAIR BRUCH: Logan.

9 BD. MEM. PETRY LINKENHOGGER: (No response.)

10 NOSB CHAIR BRUCH: Absent. Corie.

11 BD. MEM. PIERCE: No.

12 NOSB CHAIR BRUCH: Franklin.

13 BD. MEM. QUARCOO: No.

14 NOSB CHAIR BRUCH: Kyla.

15 BD. MEM. SMITH: No.

16 NOSB CHAIR BRUCH: Javier.

17 BD. MEM. ZAMORA: (No response.)

18 NOSB CHAIR BRUCH: Absent. Brian.

19 BD. MEM. CALDWELL: No.

20 NOSB CHAIR BRUCH: Kathryn.

21 BD. MEM. DESCHENES: No.

22 NOSB CHAIR BRUCH: Carolyn.

23 BD. MEM. DIMITRI: No.

24 NOSB CHAIR BRUCH: Amanda.

25 BD. MEM. FELDER: No.

1 NOSB CHAIR BRUCH: Andrea.

2 BD. MEM. HATZIYANNIS: No.

3 NOSB CHAIR BRUCH: Allison.

4 NOSB VICE CHAIR JOHNSON: No.

5 NOSB CHAIR BRUCH: Nate.

6 SECRETARY LEWIS: No.

7 NOSB CHAIR BRUCH: Chair votes no.

8 SECRETARY LEWIS: Zero -- excuse me, zero no, 12
9 yes, zero abstentions, zero recusal, three absent; the
10 motion fails.

11 BD. MEM. CALDWELL: All right, well, thank you so
12 much, Amy, for stepping in and doing those extra ones.
13 Really appreciate that. And along with being a Chair, and a
14 million other responsibilities, it's wonderful.

15 NOSB CHAIR BRUCH: It was a pleasure.

16 BD. MEM. CALDWELL: So, we're going to -- yeah. I
17 bet.

18 We'll move on to sucrose octanoate esters, and
19 Franklin, I believe you're our person for that. And I
20 believe you did the same thing with Crops, am I right?

21 BD. MEM. QUARCOO: Yes. Yes, you're right.

22 All right, so from yesterday we heard all expects
23 of SOEs, sucrose octanoate esters, so that will make me move
24 a little faster.

25 But here it is listed as 205.603 as a topical

1 treatment, external parasiticide or local anesthetic as
2 applicable. Everything else, most of the things we said
3 yesterday still apply. It's not specifically mentioned in
4 any of the other partners that we have, so I'll move
5 directly to the discussion. Public comments.

6 A little bit of history here. In the spring of
7 2018, it was voted that there were no public comments
8 received from beekeepers. It was later clarified that was
9 because, you know, most of the organic honey, or beekeepers,
10 or let's say organic honey, was coming from outside the
11 country, and those beekeepers were not attending the NOSB
12 meeting, and that's why nobody was hearing from them. But
13 there were other livestock producers who said that this
14 product was important for beekeepers.

15 Also -- and then let's talk about some of their
16 comments. A public health advocacy organizations talked
17 about the fact that in view of the restrictive use of SOEs
18 and the difficulties that beekeepers have in managing the
19 Varroa mite and maintaining health of honeybees, they -- it
20 should be kept on the National List. There were others who
21 said that it is difficult to apply. It's miserable to apply
22 both to the person applying it and to the bees. Others said
23 that it was not as effective as the alternatives, which are
24 oxalic acid and formic acid.

25 Then a certifier said that there was at least one

1 client who was using an OMRI listed material for managing
2 Varroa mites. And so the comments are all over the place.
3 There's somebody who said they used it themselves, but it
4 was difficult to apply. And a whole range of stuff. And
5 then they -- it's also the concept that you keep it on the
6 list and have an expanded toolbox that folks could use. And
7 so these are just a range of comments about SOEs. And,
8 yeah, those are the main things that I want to point out at
9 this point. And the Subcommittee was of the view -- voted
10 to keep it on the National List.

11 That's about all that I have on SOEs.

12 BD. MEM. CALDWELL: Okay. Any questions or
13 comments for Franklin?

14 BD. MEM. QUARCOO: Brian, one important thing that
15 I left out, which was mentioned just before we got here, is
16 there was a major comment that the absence of apiculture
17 standards, you know, it doesn't provide a framework for use
18 of these things, because if you want to go down it and say,
19 okay, let's use cultural methods to manage the stuff, let's
20 use, you know, whether biological methods, whatever other
21 methods are there before we get to the use of synthetic
22 materials. And it's also resulting in the issues where
23 different certifiers, there's no standard requirement. So
24 the lack of apicultural standards was pointed out strongly,
25 and it was said that once that is introduced, that it makes

1 it is easier to evaluate how synthetic products like this
2 can be used.

3 So sorry, I left that important point out. It
4 featured in public comments prominently. Thank you.

5 BD. MEM. CALDWELL: All right, thank you,
6 Franklin.

7 Well, Franklin, I have a question for you, and
8 that is, can you talk a little bit about the resistance that
9 organisms may build up to pesticides and being able to
10 rotate different pesticides with different modes of action?

11 BD. MEM. QUARCOO: Yes. So especially when you
12 are dealing with pesticide, the important thing is that it
13 has to be a different mode of action. If it is the same
14 mode of action of the pesticide, just switching them from
15 one to the other, just changing names, but it's the same
16 problem. The pathway by which it causes death in the target
17 organism has to be different. And so if you keep using the
18 same product, it serves as a selection pressure, and so
19 subgroups within that target organism that are able to have
20 a mechanism to overcome whatever you are applying, it will
21 weed out the weak ones who don't have that mechanism, and
22 those that have it, they will be selected. And once they
23 are selected, and breeding and mating, okay, now you are
24 just raising a group of individuals who that thing no longer
25 works against. But if you keep switching it, then nobody,

1 or very few of that target organism, can start expressing
2 some kind of resistance, which will keep going down the line
3 when they breed. So it's always good to just keep changing.
4 So when you have an expanded toolbox, it gives -- it gives
5 folks the opportunity to keep exposing stuff to different
6 things. Well, if you survive that, you will not survive the
7 next thing that comes in, and then that doesn't give one
8 consistent selection pressure that selects a few individuals
9 that can deal with whatever you are dealing with.

10 So just switching things. So an expanded toolbox
11 is always a great idea, unless there are other major
12 problems associated with some of the tools that you are
13 keeping in the toolbox. I don't know whether that helps.

14 BD. MEM. CALDWELL: Yeah. No, yeah. And we
15 can -- I mean, I guess I don't know for absolute certain,
16 but I would be very -- bet strongly that sucrose octanoate
17 esters have a different mode of action than formic acid.
18 And I do know that in the conventional world, Varroa mites
19 have developed resistance to some of the materials that have
20 been used against them. So I'm just trying to expand the
21 reasoning behind having a good toolbox in this particular
22 material.

23 BD. MEM. QUARCOO: And just, sort of, yesterday we
24 did mention what this does. You know, it's not about
25 chemical process, it's a disruption of, like, the lipids in

1 the cuticle, and so it helps it to be selective against
2 stuff, so it's not just killing everything. And then it's
3 also not the same mode of action like a biochemical pathway.
4 So it's important to keep something like this on the list.

5 BD. MEM. CALDWELL: All right. Great.

6 Any other questions or comments?

7 (No response.)

8 BD. MEM. CALDWELL: Thanks, Franklin.

9 And Amy, I think it's back to you.

10 NOSB CHAIR BRUCH: Yeah, thank you, Brian and
11 Franklin, for unpackaging and highlighting the different
12 modes of action there. Really important to understand that.

13 All right, there's a motion to remove sucrose
14 octanoate esters from the National List. It was motioned by
15 Franklin, seconded by Nate. We will start the voting with
16 Dilip.

17 BD. MEM. NANDWANI: No.

18 NOSB CHAIR BRUCH: Logan.

19 BD. MEM. PETRY LINKENHOGGER: (No response.)

20 NOSB CHAIR BRUCH: Absent. Corie.

21 BD. MEM. PIERCE: No.

22 NOSB CHAIR BRUCH: Franklin.

23 BD. MEM. QUARCOO: No.

24 NOSB CHAIR BRUCH: Kyla.

25 BD. MEM. SMITH: No.

1 NOSB CHAIR BRUCH: Javier.
2 BD. MEM. ZAMORA: (No response.)
3 NOSB CHAIR BRUCH: Absent. Brian.
4 BD. MEM. CALDWELL: No.
5 NOSB CHAIR BRUCH: Kathryn.
6 BD. MEM. DESCHENES: No.
7 NOSB CHAIR BRUCH: Carolyn.
8 BD. MEM. DIMITRI: No.
9 NOSB CHAIR BRUCH: Amanda.
10 BD. MEM. FELDER: No.
11 NOSB CHAIR BRUCH: Andrea.
12 BD. MEM. HATZIYANNIS: No.
13 NOSB CHAIR BRUCH: Allison.
14 NOSB VICE CHAIR JOHNSON: No.
15 NOSB CHAIR BRUCH: Nate.
16 SECRETARY LEWIS: No.
17 NOSB CHAIR BRUCH: Cat.
18 BD. MEM. McCLUSKY: (No response.)
19 NOSB CHAIR BRUCH: Absent. Chair votes no.
20 SECRETARY LEWIS: Zero yes, 12 no, zero
21 abstentions, zero recusals, three absent; the motion fails.
22 BD. MEM. CALDWELL: Okay, moving on to List 4
23 Inerts. And luckily, this is -- this is listed under
24 Livestock, as well, for pesticides used in livestock
25 production. Yeah, okay, there's -- there's the listing at

1 205.603(e). And we've gone over a lot of the issues with
2 List 4 Inerts in the Crops discussion, so I don't think we
3 have to repeat all that. The list -- these inerts are used
4 in almost all pesticide formulations, including those that
5 are used for -- in livestock situations.

6 In terms of the written comments that we received,
7 they were mostly focused on crops. We did have four in
8 favor of relisting focused on livestock and no -- none
9 against resisting that were specifically focused on
10 livestock.

11 So that's very -- a very brief recapitulation
12 there. And any other questions or comments on this?

13 Oh, I guess I should just say for the record
14 before we vote that the concept is here -- is to leave them
15 on the National List while List 4 Inerts are being -- are
16 going through rulemaking and going to be replaced by a new
17 rule on inerts. So that -- I -- that needs to be said. And
18 I apologize for skipping over that. But that's key -- the
19 key, the key point here.

20 So now any further questions or comments?

21 (No response.)

22 BD. MEM. CALDWELL: Seeing none, Amy, I think
23 we're ready for a vote on this one.

24 BD. MEM. CALDWELL: All right, thanks, Brian.

25 There's a motion to remove EPA List 4 Inerts from

1 the National List. Motioned by Brian, seconded by Nate.

2 We'll start the voting with Logan.

3 BD. MEM. PETRY LINKENHOGGER: (No response.)

4 NOSB CHAIR BRUCH: Absent. Corie.

5 BD. MEM. PIERCE: No.

6 NOSB CHAIR BRUCH: Franklin.

7 BD. MEM. QUARCOO: No.

8 NOSB CHAIR BRUCH: Kyla.

9 BD. MEM. SMITH: No.

10 NOSB CHAIR BRUCH: Javier.

11 BD. MEM. ZAMORA: (No response.)

12 NOSB CHAIR BRUCH: Absent. Brian.

13 BD. MEM. CALDWELL: No.

14 NOSB CHAIR BRUCH: Kathryn.

15 BD. MEM. DESCHENES: No.

16 NOSB CHAIR BRUCH: Carolyn.

17 BD. MEM. DIMITRI: No.

18 NOSB CHAIR BRUCH: Amanda.

19 BD. MEM. FELDER: No.

20 NOSB CHAIR BRUCH: Andrea.

21 SECRETARY LEWIS: No.

22 NOSB CHAIR BRUCH: Allison.

23 NOSB VICE CHAIR JOHNSON: No.

24 NOSB CHAIR BRUCH: Nate.

25 SECRETARY LEWIS: No.

1 NOSB CHAIR BRUCH: Cat.

2 BD. MEM. McCLUSKY: (No response.)

3 NOSB CHAIR BRUCH: Absent. Dilip.

4 BD. MEM. NANDWANI: No.

5 NOSB CHAIR BRUCH: And the Chair votes no.

6 NOSB CHAIR BRUCH: Zero yes, 12 no, zero
7 abstention, zero recusal, three absent; the motion fails.

8 BD. MEM. CALDWELL: All right, thanks, Nate, for
9 doing all your secretarial work here in good style.
10 Appreciate that.

11 SECRETARY LEWIS: Luckily, luckily, we're dealing
12 entirely with whole numbers, so it remains in my wheelhouse.

13 BD. MEM. CALDWELL: All right. Okay, well, I'm
14 going to do the next one, as well, on excipients. And
15 excipients are analogous to inert ingredients, except
16 they're used in medicines and not in pesticides. And
17 they're listed at 205.603 under their own category (f), and
18 I just wanted to, kind of, go through that.

19 There's, sort of, a bunch of different groups of
20 materials that go through different hoops that can be used
21 as excipients. But they all have strong medical or health
22 hurdles that they have to go through before they get on
23 these lists. They're either identified as GRAS, generally
24 recognized as safe, approved by the FDA as a food additive,
25 or this is, kind of, a big one here, included in the FDA

1 review and approval of a new animal drug application or a
2 new drug application. So they're approved under that, sort
3 of, view by the FDA. Or they're approved by APHIS for use
4 in veterinary biologics.

5 So that said, supposedly there are up to 8,000
6 different materials that could be used as excipients, and
7 the ones that are actually used in organic medicines as
8 excipients is a much smaller subset. We don't know what it
9 is. This is all, kind of, going to the point that
10 excipients do need a review. And my opinion and the opinion
11 of the Livestock Subcommittee was that, when the approach to
12 inerts is finalized via rulemaking, the pesticide inerts,
13 then we would like to see an analogous approach used for
14 excipients if it fits, if it's possible.

15 Meanwhile, as usual, in order to prevent massive
16 disruption of organic veterinary care, it's -- there's a
17 strong incentive to keep the excipients listing as is and
18 move ahead with it.

19 Okay, written comments; basically, four were in
20 favor of relisting this way, four were against it, and they
21 basically said that we need to address this issue, you know,
22 basically sooner rather than later, clarify some of the --
23 well, just clarify the whole thing. And one said that we
24 need to list anything that's approved as an excipient
25 individually on the National List, which is, sort of, one of

1 the possible options that may happen in the future.
2 However, we're not at that point, in my opinion, in our
3 livestock discussion, to move for -- to delist and then wait
4 for that to happen, because that would be, kind of, a
5 disaster.

6 Except for teat dips, excipients are used in small
7 amounts in veterinary medicines. So the amount of actual
8 materials we talk about here is actually quite small.

9 And I think that is it. You know, certainly, a
10 topic deserves a lot of thought, and I would appreciate any
11 further comments or questions about this before we move to a
12 vote.

13 Kyla.

14 BD. MEM. SMITH: Yeah, I agree with waiting till
15 things, sort of, resolve with inert and following a similar
16 evaluation process.

17 I will say that it sometimes is quite burdensome
18 for certifiers to navigate to these outside data tables,
19 and, you know, there's not one centralized location, and so
20 sometimes we're having to navigate to, you know, four or
21 five different sources to try to determine if one of these
22 four are applicable. And in general, they are, but it's
23 just, like, you know, the extra process of jumping through
24 the hoops. So any streamlining of that would be greatly
25 appreciated from the certifier community.

1 BD. MEM. CALDWELL: Great. Thanks, Kyla. Nate.

2 SECRETARY LEWIS: Yeah, I appreciate the
3 discussion, particularly as it relates to the corollary of
4 inerts in crop production. I'll say that the one
5 inconsistency there in terms of it being a corollary is that
6 we were, in Crops, reacting to List 4 being a defunct and no
7 longer maintained list.

8 BD. MEM. CALDWELL: Um-hmm.

9 BD. MEM. NANDWANI: Sort of, a static list based
10 on old science and old regulatory frameworks. In the case
11 of excipients, while we are referencing external lists, we
12 are referencing the current lists and the ones that are
13 actively being maintained by the federal agencies that are
14 in charge of and authorized to evaluate these types of
15 substances. So that, for me, gives me a little bit of
16 assurance that we're at least referencing the current data,
17 as opposed to the old data, as we were with Crops and the
18 old List 4 inerts.

19 But that being said, I think that a refresh, or at
20 least looking at ideas for a refresh, is completely within
21 the bounds at the next Sunset Review.

22 BD. MEM. CALDWELL: Nate, thank you so much.
23 That's a great point. Appreciate that.

24 Any other questions or comments?

25 (No response.)

1 BD. MEM. CALDWELL: Amy.

2 NOSB CHAIR BRUCH: Brian, I was just going to
3 recognize you; I believe this is your last Sunset, as well.
4 I know the Chairs have been recognizing folks in the
5 process, but I just really want to say thank you, Brian.
6 There was no task too hard for you to sign up for over the
7 years, and a lot of these Sunsets that you have been
8 shepherding and leading are very complex, and I really
9 appreciate you, you know, turning over every stone to find
10 the information so we could accurately deliberate on things.
11 So thank you so much, Brian.

12 BD. MEM. CALDWELL: Well, thank you, Amy. I
13 really appreciate that. Great. Okay, now we'll vote.

14 NOSB CHAIR BRUCH: Right. Yes. Now I'll take
15 it -- take back the mic.

16 Okay, there's a motion to remove excipients from
17 the National List. It was motioned by Brian, seconded by
18 Amy. And the voting will start with Corie.

19 BD. MEM. PIERCE: No.

20 NOSB CHAIR BRUCH: Franklin.

21 BD. MEM. QUARCOO: No.

22 NOSB CHAIR BRUCH: Kyla.

23 BD. MEM. SMITH: No.

24 NOSB CHAIR BRUCH: Javier.

25 BD. MEM. ZAMORA: (No response.)

1 NOSB CHAIR BRUCH: Absent. Brian.
2 BD. MEM. CALDWELL: No.
3 NOSB CHAIR BRUCH: Kathryn.
4 BD. MEM. DESCHENES: No.
5 NOSB CHAIR BRUCH: Carolyn.
6 BD. MEM. DIMITRI: No.
7 NOSB CHAIR BRUCH: Amanda.
8 BD. MEM. FELDER: No.
9 NOSB CHAIR BRUCH: Andrea.
10 BD. MEM. HATZIYANNIS: No.
11 NOSB CHAIR BRUCH: Allison.
12 NOSB VICE CHAIR JOHNSON: No.
13 NOSB CHAIR BRUCH: Nate.
14 SECRETARY LEWIS: No.
15 NOSB CHAIR BRUCH: Cat.
16 BD. MEM. McCLUSKY: (No response.)
17 NOSB CHAIR BRUCH: Absent. Dilip.
18 BD. MEM. NANDWANI: No.
19 NOSB CHAIR BRUCH: Logan.
20 BD. MEM. PETRY LINKENHOGGER: (No response.)
21 NOSB CHAIR BRUCH: Absent. And the Chair votes
22 no.
23 SECRETARY LEWIS: Zero yes, 12 no, zero
24 abstentions, zero recusal, three absent; the vote -- or the
25 motion fails.

1 BD. MEM. CALDWELL: Okay. Winding up the
2 Livestock session here -- oh, I'm sorry, Livestock Sunsets.
3 And then there's going to be one more, so I apologize for
4 that.

5 So, Franklin, this is up for you.

6 BD. MEM. QUARCOO: Right. So strychnine is a
7 nonsynthetic substance prohibited for use in livestock
8 production. There is no individual or group that is
9 clamoring for this to be allowed for use, and so that's all
10 I need to say about strychnine.

11 If there are any comments, we have them, but
12 nobody's asking for this to be removed from where it is on
13 the National List. Or in other words, to be allowed for use
14 in organic agriculture of any kind. Thank you.

15 BD. MEM. CALDWELL: All right. Any questions
16 about strychnine?
17 (No response.)

18 NOSB CHAIR BRUCH: All right. There is a motion
19 to remove strychnine from the National List. It was
20 motioned by Franklin, seconded by Amy. We will start the
21 vote, actually with Franklin.

22 BD. MEM. QUARCOO: No.

23 NOSB CHAIR BRUCH: Kyla.

24 BD. MEM. SMITH: No.

25 NOSB CHAIR BRUCH: Javier.

1 BD. MEM. ZAMORA: (No response.)
2 NOSB CHAIR BRUCH: Absent. Brian.
3 BD. MEM. CALDWELL: No.
4 NOSB CHAIR BRUCH: Kathryn.
5 BD. MEM. DESCHENES: No.
6 NOSB CHAIR BRUCH: Carolyn.
7 BD. MEM. DIMITRI: No.
8 NOSB CHAIR BRUCH: Amanda.
9 BD. MEM. FELDER: No.
10 NOSB CHAIR BRUCH: Andrea.
11 BD. MEM. HATZIYANNIS: No.
12 NOSB CHAIR BRUCH: Allison.
13 NOSB VICE CHAIR JOHNSON: No.
14 NOSB CHAIR BRUCH: Nate.
15 SECRETARY LEWIS: No.
16 NOSB CHAIR BRUCH: Cat.
17 BD. MEM. McCLUSKY: (No response.)
18 NOSB CHAIR BRUCH: Absent. Dilip.
19 BD. MEM. NANDWANI: No.
20 NOSB CHAIR BRUCH: Logan.
21 BD. MEM. PETRY LINKENHOGGER: (No response.)
22 NOSB CHAIR BRUCH: Absent. Corie.
23 BD. MEM. PIERCE: No.
24 NOSB CHAIR BRUCH: And the Chair votes no.
25 SECRETARY LEWIS: Zero yes, 12 no, zero

1 abstentions, zero recusals, three absent; the motion fails.

2 BD. MEM. CALDWELL: Okay, that does it for our
3 Sunsets.

4 There's one more thing, which is the oxytocin
5 annotation change. The wording that is going to be changed
6 at 205.603(a)(22), Oxytocin. Currently, it says, "For use
7 in postparturition therapeutic applications." And the
8 proposal is to amend that to these -- this wording, "For use
9 in postparturition therapeutic applications within three
10 days after birth. It may not be administered to increase an
11 animal's milk production or for milk letdown."

12 And basically what this is all about is, that
13 oxytocin can be used for those purposes that are being
14 excluded here. It can -- it's a little bit controversial,
15 but it can supposedly help in total milk production, but it
16 can help in milk letdown shortly after birth. But the
17 organic community does not want it to be used for that, only
18 for therapeutic medical treatments, usually for prolapse
19 uterus. But anyways, this is just to clarify this, because
20 some of the certifiers have interpreted things different
21 ways, and this, kind of, nails it all down.

22 In the written comments, there were 15 in favor
23 and two opposed, and the 15 agreed that it is a useful and
24 clear way to improve the annotation. One of the objections
25 said that three days may be too narrow, but in -- when this

1 was discussed in the Committee, it seemed like, in the vast,
2 overwhelming majority of cases, three days would be plenty
3 of time to cure a postpartum therapeutic issue. And one
4 group said that the current annotation was that it
5 sufficient as it was written, but almost everybody else
6 disagreed with that.

7 So, any -- oh, I just wanted to say that it's
8 really good that we have this -- our, sort of, newer
9 annotation process in place so that we can address
10 annotation issues at the same time that we're doing the
11 Sunset Reviews. Because in the past, a lot of times, the
12 Sunset Review would say something, like, well, the
13 annotation really should say this, or it should be changed,
14 but that got lost in the shuffle and was never picked up
15 again until the next review, when somebody would read that
16 and say, oh, my God, we should have addressed that
17 annotation, but we didn't, and then it would be lost again.
18 So our current program for annotation -- handling
19 annotations catches them at the right time for discussion,
20 and I think it's wonderful that we're doing this. So
21 anyways, that's a little bit off this specific topic, but
22 about annotation changes, we really want to try to keep on
23 top of that, keep them current.

24 So excuse me, any questions about the annotation
25 for oxytocin?

1 (No response.)

2 BD. MEM. CALDWELL: I'm not seeing any. So, Amy,
3 here's our last -- could be our last Livestock vote of the
4 day.

5 NOSB CHAIR BRUCH: Okay, excellent, Brian. Thank
6 you so much. I'm not seeing any questions either.

7 We'll go to the vote. Motion to amend the
8 annotation of oxytocin to read, "For use in postparturition
9 therapeutic applications within three days after birth. It
10 may not be administered to increase an animal's milk
11 production or for milk letdown." Motioned by Brian,
12 seconded by Amy. We will start the vote here with Kyla.

13 BD. MEM. SMITH: Yes.

14 NOSB CHAIR BRUCH: Javier.

15 BD. MEM. ZAMORA: (No response.)

16 NOSB CHAIR BRUCH: Absent. Brian.

17 BD. MEM. CALDWELL: Yes.

18 NOSB CHAIR BRUCH: Kathryn.

19 BD. MEM. DESCHENES: Yes.

20 NOSB CHAIR BRUCH: Carolyn.

21 BD. MEM. DIMITRI: Yes.

22 NOSB CHAIR BRUCH: Amanda.

23 BD. MEM. FELDER: Yes.

24 NOSB CHAIR BRUCH: Andrea.

25 BD. MEM. HATZIYANNIS: Yes.

1 NOSB CHAIR BRUCH: Allison.
2 NOSB VICE CHAIR JOHNSON: Yes.
3 NOSB CHAIR BRUCH: Nate.
4 SECRETARY LEWIS: Yes.
5 NOSB CHAIR BRUCH: Cat.
6 BD. MEM. McCLUSKY: (No response.)
7 NOSB CHAIR BRUCH: Absent. Dilip.
8 BD. MEM. NANDWANI: Yes.
9 NOSB CHAIR BRUCH: Logan.
10 BD. MEM. PETRY LINKENHOGGER: (No response.)
11 NOSB CHAIR BRUCH: Logan?
12 BD. MEM. PETRY LINKENHOGGER: (No response.)
13 NOSB CHAIR BRUCH: Absent. There we go. Let's
14 see --
15 BD. MEM. PETRY LINKENHOGGER: Yes.
16 NOSB CHAIR BRUCH: Logan, are you back?
17 BD. MEM. PETRY LINKENHOGGER: Yes. Yeah.
18 NOSB CHAIR BRUCH: Okay. Great to have you.
19 Thank you, Logan.
20 BD. MEM. PETRY LINKENHOGGER: Thank you.
21 Corie.
22 BD. MEM. PIERCE: Yes.
23 NOSB CHAIR BRUCH: Franklin.
24 BD. MEM. QUARCOO: Yes.
25 NOSB CHAIR BRUCH: Chair votes yes.

1 SECRETARY LEWIS: Thirteen yes, zero no, zero
2 abstentions, zero recusals, two absent; the motion carries.

3 BD. MEM. CALDWELL: All right, a big thank you to
4 our small but mighty Livestock Subcommittee. Really
5 appreciate that. And back to you, Amy.

6 NOSB CHAIR BRUCH: Excellent. And thank you,
7 Brian, for your leadership, both direct and indirect, over
8 the years of your contributions to the livestock community.
9 Thank you. And just all of what I said earlier, when you
10 take on these complex materials, it betters us because we
11 can understand then the nuances with some of these
12 substances. And you are a great one to make sure the
13 majority opinion is understood, the minority opinion is
14 understood, and we can focus on the real deliberation with
15 that. So I really appreciate your direct and indirect
16 leadership with the Subcommittee, and then just throughout
17 the rest of the subcommittees, thank you so much.

18 Oh, Nate, I see your hand.

19 SECRETARY LEWIS: Yeah, I just wanted to make sure
20 everyone was clear about this annotation change at Sunset
21 process, and I'm sort of, like, the -- hopefully not a
22 broken record on this, but we voted to -- on the motion to
23 remove oxytocin in its current form, and we also voted to
24 change its annotation. And so what the Program now has
25 before it is a choice between relisting oxytocin as it

1 currently sits, or -- which is a fairly straightforward
2 notice that they put in the Federal Register, or going
3 through rulemaking action to -- and accepting the annotation
4 change that we just proposed.

5 So, you know, again, clear -- I know the Board all
6 knows this, but just for those listening, what exactly is
7 going on here, now is in the Program's court to determine
8 whether it will simply renew the listing that is currently
9 on the National List for oxytocin or engage in rulemaking
10 action. I personally hope that they engage in the
11 rulemaking action because I think it reflects good further
12 refinement of the rules and the National List.

13 But anyway, just wanted to provide that
14 clarification about our annotation change at Sunset Review
15 process so that folks are all on the same page there.

16 NOSB CHAIR BRUCH: Thank you, Nate, for
17 communicating process there. Kyla.

18 BD. MEM. SMITH: One additional point, too, is,
19 like, if the Program does move forward with the annotation
20 through rulemaking and it fails for some reason, they still
21 have the recommendation to list in its current form. We
22 know that that's been a challenge in the past. Sodium
23 nitrate, the material we all love and love to hate or
24 whatever.

25 NOSB CHAIR BRUCH: Okay, excellent. Well, again,

1 thank you, Livestock Subcommittee. Thank you, Brian, for
2 your leadership as Chair of that subcommittee.

3 And now we will be transitioning on to CACS, and
4 Kyla is our Chair of that committee. And, Kyla, I'm just
5 looking at the time; it appears that we do have a scheduled
6 break at the top of the hour. So, are you up for the goal
7 of tackling the next bullet within the confines of our break
8 time?

9 BD. MEM. SMITH: I will do my best to get us
10 through Risk-based Certification in 23 minutes.

11 Okay, so we have three agenda items today. Like I
12 mentioned, we have a proposal on risk-based certification.
13 We also have a proposal on residue testing for global supply
14 chain, specifically looking at updating the exclusion from
15 sale regulatory language at 605 -- I'm sorry, 205.671 to
16 better align with OFPA. And, lastly, we'll run through the
17 discussion document that's also on residue testing, looking
18 at other regulatory updates, namely to 205.670. We will not
19 be discussing e-commerce or seed today. Those were
20 originally on the fall agenda, and those will be taken up at
21 future meetings.

22 I am the lead on Risk-based Certification, so I
23 will get us started on that conversation. This is the third
24 time that the Board has been discussing this topic. We
25 originally requested this as a Work Agenda item. CACS

1 requested this as a Work Agenda item after the spring 2024
2 meeting when there were several comments that were brought
3 up around smaller, lower-risk operations feeling overly
4 burdened due to the implementation of the Strengthening
5 Organic Enforcement, or SOE, Final Rule, and that wasn't
6 sitting particularly well with those folks, or -- you know,
7 and the community writ large, as they were not the
8 intended -- like, largely not the intended target of that
9 rulemaking. And, you know, Jenny had alluded to that also
10 in her update yesterday.

11 Previous to that, we were engaging in the
12 community, and we continue to do so, on the human capital
13 constraints sort of conversation, specifically acknowledging
14 the need for more inspectors and review staff and exploring
15 ideas on how to reduce burnout in these critically important
16 roles to the certification process. So the Risk-based Work
17 Agenda item was birthed. We requested that and it was
18 granted.

19 In that Work Agenda request, CACS acknowledged
20 that there were some resources available to certifiers and
21 the wider stakeholder community on how to implement a risk-
22 based approach to certification and decision-making. And we
23 specifically stated that, "NOSB plans to seek feedback on
24 the effectiveness of the current resources and requests that
25 NOP develop additional resources and guidance, as needed, to

1 ensure that, (1) all stakeholders are operating from a
2 shared understanding and definition of risk as it applies to
3 the organic industry." You know, meaning that, like,
4 there's the inclusion of both risk to organic integrity that
5 can be different than risk of fraud, and that those specific
6 identifications of risk to an operation is different than
7 risk-based approaches to decision-making.

8 Second bullet point was "Certifiers evaluate an
9 operation's risk using common and agreed-upon criteria."

10 Third, "Certifiers apply a shared risk-based
11 decision-making framework to the various types of operations
12 that they certify to focus on and spend more time on
13 operations, activities, et cetera, that present a greater
14 risk."

15 And then fourth, as a result of that, that
16 "operations would then -- that are lower risk are then
17 experience -- experiencing a more streamlined certification
18 experience; shorter paperwork, more streamlined
19 inspections."

20 So that was sort of the bullet list that we had
21 written up in the work agenda item.

22 I'm going to run us through the public comment
23 that we received this round, and then circle back around to
24 see how we hit on those bullet points. So, in general,
25 stakeholders continue to be very supportive of this concept.

1 However, there was some limited few who thought that the
2 proposal was premature and that CACS should have been doing
3 more specific developing of these items, and that it --
4 yeah, so and I'll hit some of that throughout the comments.

5 Okay, so the proposal was broken up into four
6 parts. The definitions. We proposed several definitions
7 within the proposal. Most stakeholders were supportive of
8 the definitions as written. There were a few suggestions
9 for minor tweaks. This community loves to wordsmith, so I
10 feel like that will happen forever and ever. I personally
11 think that they are sufficient for now. We had indicated
12 from the get [sic] that we were -- or and we had received
13 comments, but had expressed that we were unsure whether or
14 not these needed to go into the regulatory -- into the
15 regulations, or if they could live, you know, elsewhere, and
16 while we were tweaking them and building them and landing on
17 something collective, it didn't seem prudent to put them
18 into the regulations. I think they're in final -- you know,
19 fairly final form, and, you know, there could be minor
20 tweaks along the way, so I think for now they're a good --
21 they're good, and let the community and the industry work
22 with them, and we can always adjust and wordsmith and tweak
23 and then decide if we feel like those need to be
24 incorporated into the regulations at some point in the
25 future.

1 The second point was the criteria. Again, we
2 proposed criteria that certifiers could use in their
3 evaluation of their certified operations, and basically
4 offered some options for baseline criteria that the NOP
5 could then decide upon. And we proposed and requested that
6 the final criteria be put into guidance or instruction in
7 the Program handbook, and a majority of commenters were in
8 favor of having that baseline criteria. Again, some
9 commenters felt as though NOSB should be developing that
10 baseline set of criteria ourselves and not giving that, sort
11 of, authority to the Program.

12 The fourth -- or I'm sorry, the third part was the
13 matrix. And so we proposed that NOP, in collaboration with
14 others, namely ACA and other certifiers, but, you know,
15 other stakeholders, as deemed appropriate, to develop this,
16 sort of, I'm calling it this matrix, where, depending on how
17 an operation, sort of, landed in the risk evaluation, it
18 would then determine actions as a result. And so, again,
19 most commenters were in favor of this idea of the
20 development of this matrix. And, again, some commenters
21 felt as though NOSB should be more proactive in developing
22 that ourselves.

23 And then the last point was around training, sort
24 of, just noting that all of these resources either were
25 being requested to be revised because they existed, or to be

1 created and that, again, in general, people are supportive
2 of training. There were some comments in particular around
3 making sure that the appropriate people who are actually
4 participating in the risk evaluation are taking these
5 trainings so that -- you know, making sure that they're
6 adequately knowledgeable and skilled and trained up to do
7 all of this.

8 So, taking a step back from those original
9 objectives that I set forth a couple minutes ago, you know,
10 have we achieved what we set out to accomplish with this
11 Work Agenda item?

12 So, first of all, I would just like to acknowledge
13 that the engagement, like, is a win within itself, I think.
14 So this agenda item allowed for discussion to take place in
15 a very public way with the wider community. We received a
16 lot of feedback, and it feels like, in most -- well, like,
17 mostly people feel like we're rowing in the right direction,
18 like, you know, in the -- at the same time and in the right
19 direction.

20 More specifically, the first point that I had gone
21 through in the Work Agenda Request was about definitions and
22 the desire to be operating from a shared understanding of
23 risk. This proposal, like I said, recommends a common set
24 of definitions for broad use -- and recommends broad use by
25 the industry. So I think we've checked that box. Still

1 some up for debate on whether or not we feel like we need to
2 add these into the regulations, but we have a working set
3 that we can now all -- that we have, for the most part,
4 agreed upon.

5 The next point was on criteria and certifiers
6 using a common set of criteria. The proposal recommends
7 that NOSB -- or that NOP, I'm sorry, publish guidance or
8 instruction in the Program handbook that establishes best
9 criteria. So, again, I think we check that box. CACS did
10 provide our opinion on which criteria the NOP should use as
11 the baseline. We gave examples, so I feel like we covered
12 our base there.

13 The third point was in regards to the decision-
14 making framework to assist certifiers in the actions
15 associated with an operation's different risk level, which
16 would, again, then ultimately result in the last point of
17 lower-risk operations experiencing a more streamlined and
18 less burdensome certification process. Again, this proposal
19 recommends that NOP and ACA and others deemed necessary
20 continue this work to develop this matrix. We included some
21 examples as a jumping-off point, and we asked or recommended
22 that this matrix also be included in the Program handbook.

23 And then we recommended that, again, like, all the
24 resources be updated or created to incorporate this body of
25 work, either within the Learning Center to revise existing

1 or new courses, or in new or updates to documents within the
2 Program handbook, and then updates to the ACA Best Practice
3 documents, and at sessions at the annual Certifier Training.

4 So I feel as though we've come a long way. I feel
5 like we've met the objectives of the Work Agenda item that
6 were in the original request. That said, this -- there's
7 still work to do. We're, like, still in the middle of doing
8 this, and I do think this proposal positions the appropriate
9 stakeholders to continue the work. And, again, the work,
10 like I said, is already starting to happen. There are
11 multiple sessions at the certifier training that's next
12 week, both on the NOP day as well as in the wider ACA
13 conference.

14 There were examples that were provided in the
15 written comments of certifiers already starting to, you
16 know, tweak and streamline their processes. I know PCO, by
17 personal anecdotes, if people are interested in hearing
18 those. And so, while I hear, like, some saying that it is
19 premature and that there needs to be more stakeholder
20 participation, I do think that -- or and that CACS needs to
21 do more of the specific development versus leaving that up
22 to others, I don't know that I necessarily agree. This is
23 an area, like I said, that's going to be very iterative. It
24 fits squarely into the foundational concept in organic that
25 we all know and love: continuous improvement. There have

1 been and will continue to be many -- like, plenty and many
2 opportunities for additional stakeholder engagement. And
3 NOP and certifiers feel like the appropriate leads to really
4 hone in and continue this work. Both are experts in
5 certification. And, again, CACS did provide lots of
6 examples in the work already.

7 So, with that, I think I will open it up for
8 discussion.

9 NOSB CHAIR BRUCH: Excellent, Kyla. Wow. I'm
10 just in awe of the work that you did, and I'm reminded by
11 this quote, that "A journey of a thousand miles begins with
12 the first step." So I think you really did a good job
13 articulating, kind of, the bounds and the scopes of this
14 Work Agenda item, and that this Work agenda topic will live
15 on. This is, I believe, pretty transformational for our
16 program to start locking down this risk-based certification
17 path. And even Dr. Tucker made some references within her
18 Program Update.

19 So I think the topic, like you said, will keep
20 living on in different forms and as we apply this framework
21 to all areas of our program. There is still a lot of work
22 to be done, but what you accomplished here, and appreciate
23 the stakeholder feedback to get us to this point, I'm really
24 excited about this body of work. And I think the overall
25 goal -- you know, it's a lot of heavy lifting on this front

1 end as we're trying to make these big reforms, but the idea
2 is that this framework should increase the bandwidth of what
3 we can get done in a day as we morph from the one-size-fits-
4 all approach to honing in on where we need to hone in on
5 that.

6 And speaking of that, I just wanted to elevate a
7 couple comments. You know, we put these through some
8 discussion in the subcommittees, in the document itself, but
9 just to elevate a few, from a boots-on-the-ground
10 perspective, of some of the risks. And this was something
11 Kyla and I, kind of, went back and forth on: do risks change
12 in our program? We hone in on one area; is that going to be
13 the area we hone in on in the future? And so we do need to
14 have a dynamic framework. But some of the things that
15 really come to mind for me are not necessarily size, but
16 agronomic environments.

17 When we're looking at subtropical and tropical
18 growing environments, that is challenging to do that. I
19 know that firsthand. When I lived in Brazil, we did not
20 have traded crops in the early 2000s. "Traded" meaning
21 genetically modified. We used non-GMO crops with all the
22 chemicals in the world, and it was very challenging to get a
23 crop over the finish line because there was no freeze-thaw
24 cycle. So there's a reason we do not have that many
25 certified organic operations in the southern tier of the

1 United States. And I really appreciate Logan's viewpoint on
2 the challenges that farmers face in the Southeast, but this
3 is a real situation. The climate is challenging to farm in,
4 so I would elevate these subtropical and tropical growing
5 environments for additional agronomic verification. Places
6 that do not have access to organically approved inputs,
7 especially in those areas of the subtropical and tropical
8 environments that don't have adequate materials that are
9 organically approved for crop protection, we need to elevate
10 those areas, as well. Poor infrastructure.

11 Nitrogen. Nitrogen is a main component to grow
12 successful crops; a lot of crops, not all crops, but a lot
13 of them, and we need to understand where the nitrogen is
14 coming from. We've had lots of deliberation over the last
15 five years on that.

16 And then just another echo. This has been said
17 many times, including in the NOP Update: these complex
18 supply chains, at least in the grain space, were usually
19 conventional and also, in organic, high volume, low margin.
20 So when we're looking at several stopping points to get, for
21 example, grains to our country, that adds costs. Right now,
22 there are tariffs in the supply chain, too, so we need to
23 unpackage these complex supply chains and really understand
24 them, because if product is arriving on our shores cheaper
25 than some folks in the country can produce, with all of

1 these logistical add-ons or tariffs, there's something to
2 question there. So we need to just really look at the ones
3 that have already been established within the community and
4 some of these new ones as we approach risks and where we
5 need to hone in more resources.

6 Thank you. I'll stop with that. I appreciate
7 that.

8 BD. MEM. SMITH: Yeah. And I will just say that
9 that is one thing within the ACA working group that had
10 established the scorecard, was making sure that there was a
11 process to keep that evergreen. Like, how do we continue to
12 evaluate whether or not the criteria are still appropriate?
13 And do we need to add more?

14 Go ahead, Nate.

15 NOSB CHAIR BRUCH: Thank you, Kyla.

16 SECRETARY LEWIS: I think I'll just share, and I'm
17 really enthused by the direction here. And my family, we've
18 been a certified operation for about 15 years now, and we
19 have participated mostly in small-scale crop and livestock
20 poultry production. And I think one of the things I've
21 observed is, as our certification system gets more and more
22 complicated, rightfully so, to, kind of, root out bad actors
23 or better align with consumer preferences, et cetera, a
24 trend I've noticed is smaller-scale, compliant operations
25 end up, sort of, bearing a lot of the brunt of the extra

1 recordkeeping and oversight, and, you know, they've been
2 doing the right thing and complying all along, and their
3 lives are getting harder. And, you know, the -- you know,
4 again, this is a little bit myopic, but then we see the bad
5 actors just getting more creative. And, you know, and I
6 realize it's a game of whack-a-mole and we need to
7 continuously improve. So I'm not at all critiquing all of
8 the work that has gone into it, other than to just express
9 that my experience has been, as a result of this -- all
10 these certification improvements, it's becoming more and
11 more burdensome to remain a certified operation,
12 particularly in the small-scale agricultural space.

13 So, that being said, I really think the trajectory
14 here is fantastic. I think a risk-based approach is
15 completely appropriate. And I think that the Board can get
16 really close to perfect. But, you know, as you're
17 experiencing, like, we've got a lot of really smart and
18 experienced people in the stakeholder community that are
19 going to contribute their input. And our proposals, like,
20 if we had all the time in the world, we could get it, you
21 know, really well, but that's just not the reality. So I am
22 personally ready to move forward and vote this one over to
23 the Program.

24 And I'll remind the Board and the folks listening
25 that the Program, when they are developing new material for

1 the handbook, also do follow a quasi-Notice and Comment
2 process, right? So they put out a proposal, they solicit
3 input. So there will be another round of input that the
4 stakeholder community can provide when the Program develops
5 its handbook materials, whether that's instruction to
6 certifiers or guidance documents.

7 So great work from CACS. Really appreciated.
8 This is, kind of, the first step in some relief that I think
9 small-scale producers are really feeling is necessary in
10 the, you know, upcoming few years of certification.

11 BD. MEM. SMITH: Thanks, Nate.

12 Yeah, I'll just say that I thought that Jenny did
13 a good job of framing this up yesterday in her update too,
14 where she had indicated that, you know, certifiers are
15 trying to balance, like, how we apply sound and sensible
16 risk-based approaches and streamline certification, and then
17 on the complete opposite end, catch fraudsters and deter
18 fraud.

19 Like, you know, anyway, how to do both of those
20 things sometimes can be a little bit tricky on how to thread
21 the needle, and so I think that, in some ways, NOP can
22 really model that in our accreditation audits. And I know
23 PCO just had ours in the fall, and we saw that -- some
24 really positive changes. So, you know, where -- we had the
25 opportunity where, if we were showing, you know, something -

1 - some processes or whatever where we didn't quite follow
2 that or, you know, whatever, that we had the opportunity to
3 show some extra examples, and there was a determination and
4 a judgment made that, well, perhaps this is like a point of
5 improvement, that you could get closer to 100 percent, but
6 just because this seemed like a one-off situation where you
7 didn't quite follow, tick all the boxes or whatever, we can
8 see that you're generally complying, and -- whereas in the
9 past we probably would have gotten a noncompliance for that.
10 And so, you know, modeling that risk-based decision from the
11 top, and then, for certifiers, I feel really empowered to be
12 able to apply that approach with our certified operations, I
13 thought was a really positive experience.

14 And then, you know, Jenny also acknowledged that
15 certifiers were learning SOE, and we might have, like, you
16 know, went a little too far, and now we're, sort of, you
17 know, scaling back. Oh, maybe we overcorrected here. The
18 pendulum swings, right. And so I thought that was really a
19 great acknowledgment.

20 And then also, like, shifting some of that
21 responsibility to the supply chain and really getting
22 certified operations within the supply chain to have some
23 additional oversight and accountability, and not having that
24 fall solely on the weight of certifiers and inspectors, I
25 think, is also very important.

1 I don't see any other hands. Maybe we're ready to
2 vote. I went over by one minute. Gosh.

3 NOSB CHAIR BRUCH: Kyla, I wish we could go even
4 more over time on this subject. Way to go with time
5 management, though. Thank you. It's, kind of, like fitting
6 a square peg in a round hole sometimes on some of these
7 discussions, but we'll do our best here.

8 So if there's no other questions?
9 (No response.)

10 NOSB CHAIR BRUCH: Thank you again, Kyla. That
11 was incredible work that you presented here. Really
12 appreciate it.

13 We will go to our first vote within CACS. So
14 there is a motion to accept the proposal on risk-based
15 certification. It was motioned by Kyla, seconded by Amy.
16 And Javier starts us off for voting.

17 BD. MEM. ZAMORA: (No response.)

18 NOSB CHAIR BRUCH: He is absent. Go to Brian.

19 BD. MEM. CALDWELL: Yes.

20 NOSB CHAIR BRUCH: Kathryn.

21 BD. MEM. DESCHENES: Yes.

22 NOSB CHAIR BRUCH: Carolyn.

23 BD. MEM. DIMITRI: Yes.

24 NOSB CHAIR BRUCH: Amanda.

25 BD. MEM. FELDER: Yes.

1 NOSB CHAIR BRUCH: Andrea.
2 BD. MEM. HATZIYANNIS: Yes.
3 NOSB CHAIR BRUCH: Allison.
4 NOSB VICE CHAIR JOHNSON: Yes.
5 NOSB CHAIR BRUCH: Nate.
6 SECRETARY LEWIS: Yes.
7 NOSB CHAIR BRUCH: Cat.
8 BD. MEM. McCLUSKY: (No response.)
9 NOSB CHAIR BRUCH: Absent. Dilip.
10 BD. MEM. NANDWANI: Yes.
11 NOSB CHAIR BRUCH: Logan.
12 BD. MEM. PETRY LINKENHOGGER: (No response.)
13 NOSB CHAIR BRUCH: Absent. Corie.
14 BD. MEM. PIERCE: Yes.
15 NOSB CHAIR BRUCH: Franklin.
16 BD. MEM. QUARCOO: Yes.
17 NOSB CHAIR BRUCH: Kyla.
18 BD. MEM. SMITH: Yes.
19 NOSB CHAIR BRUCH: And the Chair votes yes.
20 Awesome. All right.
21 SECRETARY LEWIS: We've got 12 year, zero no, zero
22 abstentions, zero recusals, three absent; the motion
23 carries.
24 NOSB CHAIR BRUCH: Excellent, Nate. Sorry to cut
25 you off there. Thanks for the recap there.

1 All right, guys, we are just a little bit after
2 the top of the hour. Why don't we take a break for 20
3 minutes here? So let's come back at 23 past the hour, and
4 we will continue on with CACS. Thank you so much.

5 (Whereupon, at 2:03 p.m., a luncheon recess was taken.)

6 NOSB CHAIR BRUCH: Welcome back, everybody. We
7 are 23 past the hour, and we have a jam-packed back half of
8 the afternoon in store for everybody. We will jump into it
9 again. We will forego one of my favorite things,
10 icebreakers, just to make sure we have enough time to
11 deliberate on these upcoming important issues. I'm going to
12 turn it back over to the Chair of CACS, Kyla, to introduce
13 our next topic.

14 BD. MEM. SMITH: Thanks, Amy. But I'm going to
15 pass the hot potato back to you, actually. So we're going
16 to go into the Residue Testing proposal, which is looking
17 at, or proposing, updates to 256.71, the exclusion from sale
18 parts of the regulations, and you can start leading us
19 through that discussion, and I'll probably jump in at the
20 end.

21 NOSB CHAIR BRUCH: Absolutely. Kyla, thank you so
22 much, and I really appreciate your collaboration and
23 bringing our farming world together with your certification
24 world as we tackle the next two subject matters.

25 Proposal right now on Residue Testing for Global

1 Supply Chain. There's a few slides just to organize the
2 framework of the discussion here. We'll introduce the
3 topic, go into public comments, and then open it up for
4 further board discussion. This has seen two rounds,
5 actually, of public comments here, and really the crux of
6 the matter, if we go to the next slide, is the challenge,
7 essentially, is there's a "lack of clarity on whether the
8 detection of direct prohibited material application -
9 intentional." That's what we're working with here,
10 intentional, regardless of where, when, and/or should be
11 excluded from sale as organic, per the regulation. And the
12 solution is essentially revising 205.601 of the regulation
13 to require exclusion from organic sales due to intentional
14 application of prohibited substance.

15 So what we're doing here is not proposing new
16 regulation. We are trying to revise what's currently there
17 to bring us closer together to the Organic Foods Production
18 Act. Right now, what the proposal does is clarify that the
19 intent, not necessarily residue level, controls exclusion
20 when prohibited substances are intentionally applied. So we
21 are working here, not necessarily on the test result, but if
22 there is a known application, a willful intent, that's what
23 we're focused in on here. This closes an enforcement gap
24 that currently relies too heavily on residue thresholds,
25 preserves the distinction between intentional application

1 and also UREC and drift. There is a distinction there,
2 continuing to protect compliant operators. Provide
3 certifiers with clear timely authority.

4 So as we went through a few rounds of public
5 comment here, not only this round, but other rounds, there
6 was a consensus that clarification was necessary, that there
7 was confusion around this. So aligning the regulation as it
8 currently exists, revising it to get to the OFPA language,
9 is really important.

10 What the proposal does not do, it does not create
11 a new standard or expand authority beyond OFPA. It does not
12 change how drift or unavoidable contamination is evaluated.
13 And it does not rely on residue testing alone to establish
14 intent. And that's something.

15 You know, the residue testing has its strengths,
16 but in terms of a willful application, let's say a certifier
17 does witness a situation, maybe a pre-application of a
18 herbicide on the front end of a crop, so there was a blanket
19 of pesticide that was not -- that was prohibited from
20 organic use, applied to the land, and that was known, and it
21 was known to be a willful intent situation, as that crop
22 grows, there might be, when it's harvested, no trace of that
23 initial pesticide applied. So that's why this is important.
24 When there is a known willful intent, we can still get that
25 product out of the supply chain and exclude it from organic

1 sales.

2 So, diving into the public comments here, there
3 was overwhelmingly support for this proposal, citing long-
4 standing ambiguity, uneven enforcement, and risk to the
5 organic integrity under the current framework. And there
6 were a few comments, some folks that we did receive public
7 comments on responded, kind of, one blanket quote or one
8 blanket contribution for both the proposal and also the
9 discussion document. There was some overlap here, but a few
10 quotes that I pulled out of, maybe what we're, kind of,
11 dealing with here is just there was a certifier that
12 mentioned 26 percent of our residue tests resulted in
13 detection that was investigated, and 47 percent of those
14 investigations resulted in exclusion from organic sale. So
15 that's just an indication to me that the threats are real.

16 There were a couple more comments. One that said
17 10 out of 22 livestock producers are aware of fraudulent
18 organic feeds, since the health of their animals is reliant
19 on valid organic crops. And then there was also another
20 public commenter that just mentioned, in doing independent
21 research and studying that -- the claims of "raised without
22 antibiotics," they have found there to be some non-
23 compliancy with -- out of detection tests there, 15 to 20
24 percent. So at -- the point that we're dealing here, there
25 needs to be something, and that's why we're here to discuss

1 this.

2 One thing to mention is that this is somewhat of a
3 derivative. A prior conversation did happen on this, and
4 this was in the time frame of the pesticide residue rule,
5 and I believe that was in the 2012, 2013 time frame, and the
6 community did bring up a question to the Program to see if
7 we could, at that time, have clarity in the regulation to
8 align it with OFPA. And at the time, over a decade ago, the
9 NOP didn't believe that there was a need for further
10 distinction, that it was implied and understood.

11 We did break this out in quite a bit of detail in
12 the proposal, and just based on uneven application of this
13 regulation, the community in general supports the revision
14 of the regulation. So, essentially, this will help with
15 consistent enforcement.

16 I was going to just turn over Kyla on two points,
17 just to head off maybe a few questions that the Board might
18 have. One is on, what if you can't prove willful intent,
19 Kyla? What would happen in the certifier world?

20 BD. MEM. SMITH: Yeah. Well, we would go through
21 the normal, like, investigation and compliance process. So
22 this is just giving us a faster level -- lever to pull for
23 exclusion from sale if it is easy to prove intent. I mean,
24 I don't think certifiers are going to open themselves up if
25 they're unsure, right? And that is a challenge. Obviously,

1 we know proving intent is challenging. And so, you know, we
2 would just follow our normal investigation and compliance
3 procedures if, you know, there wasn't clearly a smoking gun.

4 NOSB CHAIR BRUCH: Thank you for that. That
5 helps. There was some community comments on that, as well,
6 the difficulty of proving willful intent. However, there
7 are cases that that does exist that this would be helpful.

8 Also, on the due process end, this was something
9 that we discussed in subcommittee, and there were a few
10 comments on that. Can you expand on any impact to due
11 process?

12 BD. MEM. SMITH: I mean, I just think it would
13 follow the normal due process that's outlined in the
14 regulations.

15 NOSB CHAIR BRUCH: Excellent. Thank you, Kyla,
16 for your weigh-in on that from your certification world.

17 Let's see, there were a couple extra comments to
18 elevate and highlight that, you know, just with potential
19 expansion. The definition where we can find OFPA criteria,
20 is with intentional application? Some -- there were three
21 comments, I guess, to elevate on potential expansion of
22 that. One was intentional commingling and/or contamination.
23 The other two comments were specifically more on, "Don't
24 forget about inputs and willful intent of using the inputs
25 that aren't organically approved.

1 So, you know, we need to make sure when we do
2 write the cover letter that we submit that information as
3 well to the NOP.

4 And as Nate had mentioned on a prior conversation,
5 not only guidance recommendations receive another public
6 comment review, but also any recommendation that the Board
7 makes to NOP that involves regulation revision, also will
8 receive another round of public comment review.

9 So I'm going to stop there just for the interest
10 of time and turn it over briefly to Kyla before we open it
11 up for any board discussion on this important Work Agenda
12 item.

13 BD. MEM. SMITH: I don't know that I actually
14 really have anything to add. I feel like the whole willful
15 intent part is what I saw most from the certification
16 community, and feeling a little bit, you know, just noting
17 concern that there is a challenge around that.

18 And so, again, you know, I think there's nothing
19 that's foreseeing our hand here that we have to pull this
20 exclusion-from-sale level if we're -- we don't have a lot of
21 evidence to support that willful intent.

22 NOSB CHAIR BRUCH: All right, thank you. That's
23 helpful.

24 So I think, in summary here, the record supports
25 moving forward with this revision as a technical statute-

1 aligned clarification that strengthens enforcement against
2 intentional violations while preserving fairness and
3 integrity for compliant organic operators. And that was
4 another overarching theme, that by implementing this, that's
5 a tip of the hat to fairness and integrity amongst those
6 that are following the rules.

7 So with that, I'll open it up for discussion,
8 questions, and exchange here. And turn it over to Kyla to
9 lead that.

10 BD. MEM. SMITH: Go ahead, Nate.

11 SECRETARY LEWIS: I, just, yeah, wanted
12 acknowledge the really great work of the subcommittee on
13 this. And the law and rules based approach that you're
14 taking. I think, you know, we -- there's definitely a
15 group -- a sentiment among the Board and the organic
16 community, that it would be great if Congress had given the
17 program stop sale authority or like some other kinds of --
18 more effective or swift or nimble tools in the enforcement
19 toolbox to get these fraudulent products, or you know,
20 contaminated products out of the marketplace more swiftly
21 than we currently have right now. But I feel like this,
22 kind of, hits the right balance where we're using the tools
23 we have available to us.

24 And I think the area for me that this really
25 encapsulates is that, like, right now, the stop sale -- or

1 the exclusion from organic sale really only applies to the
2 misuse of pesticides, and -- because it's connected to the
3 EPA tolerance or FDA action levels. But this change would
4 allow for the exclusion of products that were fertilized
5 with a prohibited substance, for example. It really
6 expands, even though I realize there are challenges with
7 proving willful intent and all of those. Right now, we can
8 only exclude things if it's a pesticide that we find. And
9 with this expansion, we would -- it would -- it is all
10 prohibited substances, and it -- so it would be the first
11 time that certifiers have this ability when it relates to
12 something that's not a pesticide.

13 So I am really heartened to see that, because I
14 know fraud with fertilizer is a serious and grave concern
15 and one that's a lot harder to detect and prove and all
16 those sorts of things. So giving certifiers one more little
17 tool to, kind of, keep that stuff from getting to the
18 marketplace is something I wholeheartedly support.

19 NOSB CHAIR BRUCH: Excellent, Nate. Thank you
20 saying that.

21 BD. MEM. SMITH: I would just say on that, yes,
22 like, I do agree with you, Nate. And through the compliance
23 pathway, there is a way to issue adverse notices for
24 suspension or revocation to get bad actors out of the supply
25 chain. This just makes it a little faster. So.

1 Go ahead, Amy.

2 NOSB CHAIR BRUCH: Yeah. Absolutely. That's kind
3 of the key element here. And you mentioned swiftness.

4 I was just going to highlight, there was a couple
5 comments that we received and worked as things on in the
6 background that I know I wanted to highlight.

7 Like one, there is a working group with AOA Seed
8 to help develop methodology for developing additional tests
9 for organic integrity. So that's excellent work that's
10 being done in the background, so we won't just have that one
11 catcher's test. As we, kind of, unpackaged at our last
12 meeting, there is going to be other items out there for
13 certifiers to be using. And just a correction on that,
14 there -- there currently is other items outside of the
15 pesticide residue test that can be applied.

16 And then some really great revolutionary work
17 happening in the private sector for testing. You know,
18 current operating procedure, usually there is a time delay,
19 potentially depending on what test you're doing outside of
20 some of the non-GMO strip tests or GMO strip tests. You
21 know, maybe there's up to a week or so delay to get the
22 results. I know there's a group actively working on--,
23 their goal is, let's say, 200 times the speed, so results
24 semi-instantaneously and 1/20 of the cost. So I know this,
25 kind of, plays into the next session on cost, but we also

1 can't get flat-footed on what innovation is occurring in our
2 environment and make sure our regulations are, kind of,
3 walking in line with some of the private innovation that's
4 out there, too.

5 So, anyway, another topic I could go over time on,
6 but with the interest of time and the need to make up a
7 little bit of time, I'm going to turn it back over to Kyla
8 just for a final round of Q&A or any last-minute points.

9 BD. MEM. SMITH: Yes. I do not see any additional
10 hands, so I think we can proceed to the vote.

11 NOSB CHAIR BRUCH: Okay. Excellent. And, Andrea,
12 if you don't mind advancing one more slide, I believe we
13 have the language here. All right. Thank you.

14 So the motion is to accept the proposal on residue
15 testing for a global supply chain regulation review of
16 205.671. It was motioned by Amy, seconded by Kyla. We will
17 start the voting with Brian.

18 BD. MEM. CALDWELL: Yes.

19 NOSB CHAIR BRUCH: Kathryn.

20 BD. MEM. DESCHENES: Yes.

21 NOSB CHAIR BRUCH: Carolyn.

22 BD. MEM. DIMITRI: Yes.

23 NOSB CHAIR BRUCH: Amanda.

24 BD. MEM. FELDER: Yes.

25 NOSB CHAIR BRUCH: Andrea.

1 BD. MEM. HATZIYANNIS: Yes.
2 NOSB CHAIR BRUCH: Allison.
3 NOSB VICE CHAIR JOHNSON: Yes.
4 NOSB CHAIR BRUCH: Nate.
5 SECRETARY LEWIS: Yes.
6 NOSB CHAIR BRUCH: Cat.
7 BD. MEM. McCLUSKY: (No response.)
8 NOSB CHAIR BRUCH: Absent. Dilip.
9 BD. MEM. NANDWANI: Yes.
10 NOSB CHAIR BRUCH: Logan.
11 BD. MEM. PETRY LINKENHOGGER: (No response.)
12 NOSB CHAIR BRUCH: Absent. Corie.
13 BD. MEM. PIERCE: Yes.
14 NOSB CHAIR BRUCH: Franklin.
15 BD. MEM. QUARCOO: Yes.
16 NOSB CHAIR BRUCH: Kyla.
17 BD. MEM. SMITH: Yes.
18 NOSB CHAIR BRUCH: Javier.
19 BD. MEM. ZAMORA: (No response.)
20 NOSB CHAIR BRUCH: Absent. And the Chair votes
21 yes.
22 SECRETARY LEWIS: Twelve yes, zero no, zero
23 absent, zero recusals -- sorry, zero abstentions, zero
24 recusals, three absent; the motion carries.
25 BD. MEM. SMITH: Okay. Moving along. We will

1 move into one additional item that is related to the topic
2 that we just looked at.

3 Over the course of the past couple of years, CACS
4 has been looking at residue testing in general, and so we,
5 you know, previously had looked at the guidance documents
6 and made recommendations that are in the Program handbook
7 and made recommendations in regards to those.

8 We just looked at the regulatory review, and we
9 had, sort of, split out the regulatory review items. We
10 just passed the proposal for the exclusion from sale piece.
11 And then the other pieces of looking at the regulations
12 mostly that are in 205.670, were captured in a discussion
13 document. We've had two rounds of discussion on these
14 topics at least, maybe, like, you know, they -- might have
15 been threads that have gotten, like, pulled through, but in
16 this, sort of, format, I believe we've had, like, two rounds
17 on them. And there's five sub, sort of, categories within
18 this document. So looking at the 5 percent of operations
19 required for certifier testing costs and how certifiers are
20 applying costs for testing or not. Public access, so
21 looking at the parts of the regulations that talk about the
22 requirement to provide results to the public and the idea of
23 a database downstream notification. And then what do we do
24 with -- about UREC. So I'm going to start us off, and if
25 you can go to the next slide, please, Andrea. Yes.

1 So this 5 percent of operations. Currently, the
2 rule requires 5 percent of operations be tested annually,
3 and in the 2012 pesticide rule, there was no specification
4 on the selection of the operations of -- you know, by
5 certifiers, so the certifiers could select operations due to
6 cause, due to a complaint or an investigation, or based on a
7 random selection. And over the year -- and I think when
8 the, you know, the pesticide residue rule in 2012, sort of,
9 took the industry from doing not very much testing, this was
10 like a result of an OIG audit, so not doing very much
11 testing to the requirement of the 5 percent, and so, you
12 know, I think it was wanting to make it, sort of, an easy on
13 ramp for certifiers to be able to, like, you know, get out
14 there and do more testing. And, as well as, I think
15 certifiers were more using testing as a tool for Organic
16 System Plan compliance verification and less of a tool for
17 fraud detection, and I do believe that has shifted a bit and
18 being able to utilize that tool for fraud detection more
19 readily. Not to say that all certifiers are doing that all
20 the time. But anyway, so as a result, you know, we've been
21 hearing from some that they do their 5 percent testing, they
22 don't get a lot of hits, so maybe we wanted to explore the
23 selection and, sort of, go in the direction of more of a
24 risk-based selection versus the random select to try to suss
25 out and use it more as a tool for fraud detection. So

1 that's what the Subcommittee in this discussion document was
2 exploring.

3 We received lots of comments and strong
4 stakeholder alignment to retain the 5 percent. So that was
5 one thing, too, that we were sort of exploring, is like, is
6 there -- is that useful to keep that metric within the
7 regulations? And we heard resoundingly, yes. We didn't
8 know -- you know, no one wanted to backslide into not doing
9 as much testing.

10 And we also heard that -- the strong desire for
11 certifiers to incorporate both risk-based and random testing
12 as part of an effective residue testing program. And so
13 they didn't want us to move in the direction of only having
14 the selection be risk-based. They thought that the random
15 select was a really good deterrent and wanted to see both of
16 those options still available.

17 So currently, again, there's nothing within the
18 regulatory text to indicate that. That both of those should
19 be a component. And so a certifier could do only, you know,
20 risk-based or -- you know, because of a complaint or
21 investigation, or only do, you know, all random select, and
22 so we're -- the Subcommittee is exploring how to include
23 both of those in the regulatory text as a requirement to
24 include both of those in their selection criteria.

25 Anything to add, Amy?

1 NOSB CHAIR BRUCH: No. I think you did a good job
2 explaining that, Kyla. I think the, just big picture is,
3 the previous conversation on risk definitely applies, you
4 know, in all areas when we unpackage risk-based
5 certification; this is one element of that.

6 BD. MEM. SMITH: I failed to say at the top, too,
7 we're going to run through each of these bullets, and then
8 circle back to take questions and discussion. So if you
9 have a question on a particular subcategory of this, make
10 note. And we just want to make sure that we're able to get
11 through the whole document, and then we'll circle back.

12 NOSB CHAIR BRUCH: Um-hmm.

13 BD. MEM. SMITH: Okay. Moving on to cost. Okay,
14 so within the current regulations, and it has been from the
15 beginning, there is the requirement for certifiers to, it
16 says, like, absorb the cost or something like that. I don't
17 have the -- my regulations open. So we were looking at that
18 and whether or not that still makes sense, even though that
19 has been a requirement from the beginning, like, pre -- you
20 know, from the Original Final Rule 2002, and then it was,
21 like, reiterated in the 2012 pesticide rule. Because not --
22 because surveyors weren't doing as much testing pre-that
23 2012 final rule, as a result of that rule, and needing to
24 add this to their -- their budget and incorporate these
25 costs, while certifiers were not able to directly pass the

1 costs along to the client being tested or the certified
2 operation being tested, many -- maybe not all, but many
3 increased certification fees across the board to be able to
4 cover these costs. So we were looking at again, sort of,
5 tied to the 5 percent, and if we are going to be doing -- if
6 there is going to be an increase of risk-based testing, if
7 we make some revisions there, what does that look like in
8 regards to covering the costs? And does that make sense for
9 certifiers to be able to have the ability to pass on the
10 costs in certain cases, such as a complaint or an
11 investigation, not a random select, and so that the person
12 who is, you know -- you know, the reason for the testing is,
13 it's more directly being passed along to them and not being,
14 sort of, cost sharing approach to or subsidizing sort of
15 approach to testing.

16 We also were asking in -- so we asked about --
17 some questions and the first one was about that, should
18 certifiers be allowed to do that? And the second was around
19 structuring -- certifiers being able to structure their fee
20 schedules to charge differently based on risk of an
21 operation. So on both, there was mixed feedback. Some
22 stakeholders stated that they didn't support the allowance
23 for certifiers to pass along the cost to their operations in
24 these certain scenarios, and were in favor of keeping the
25 status quo, noting that the 5 percent minimum should be

1 viewed as the standard cost of providing certification
2 services. Passing costs along isn't always equitable,
3 meaning that this operation being tested due to complaint
4 may not be the operation responsible for the contamination.
5 Albeit the system now, I would argue, is not equitable. So
6 either way, it's not great. And that it's challenging for
7 operations to include this as a budgeted expense, since
8 complaints and investigations are unpredictable. And some
9 also indicated that they didn't support passing along the
10 cost for complaints and investigations, but should be able
11 to pass along the costs for follow-up testing. And we did
12 receive some comments indicating that -- or, you know, more
13 comments were in favor of updates to the regulatory text to
14 allow this direct charge, but only when the test is being
15 conducted as a complaint or investigation. That was one
16 piece. And then additionally, an added criteria that
17 operations should only be charged if the complaint was first
18 valid or credible, and then if contamination was determined
19 to be caused by an intentional application or failure to
20 adhere to their organ assistance plan, so essentially if it
21 resulted in a non-compliance or adverse action.

22 And then the second question was seeking feedback
23 on the implementation of, like, a tiered certification fee
24 schedule, like I said, where a higher-risk operation would
25 pay more. And again we receive mixed feedback. Some

1 weren't in favor of that, and others pointed out that based
2 on the current regulations that certifiers already are able
3 to have flexibility in their fee schedule and can already do
4 this.

5 Okay, I think that's it for now.

6 Amy, anything to add?

7 NOSB CHAIR BRUCH: Yeah, thank you, Kyla. That
8 was great.

9 A couple call outs real quickly here. I know
10 we're -- time is a bit limited. I just wanted to mention, I
11 know there's flexibility on a certifier fee schedule, but it
12 is challenging when one does something different than the
13 others on charges for risk. And so there -- there is a
14 potential for certified operations to shop around. So
15 collectively, I know there's an ACA meeting coming up next
16 week. We, kind of, maybe need to think about how -- how
17 that can be done, because essentially, when we're looking at
18 the one-size-fits-all plan as a farmer, I do feel like when
19 the costs are absorbed by a certifier that that isn't the
20 case. Essentially, certifiers are adding this into
21 everybody's fee schedule for an operation. It just costs
22 more to be certified. If we're just going to divide all the
23 costs of testing amongst all the operations that are
24 certified amongst one certifier, that also, then if you
25 follow the ball down the road, that means we need the

1 certification cost share help from the USDA to help
2 subsidize some of our costs. So looking at this, the
3 riskiest players, when we define risk, should be shouldering
4 a little bit more of the testing costs in a way through
5 their fees versus everybody pitching in for their standard
6 amount.

7 There was, I think, a comment that said, out of
8 500 -- 500 certified operations, if we do 5 percent, there's
9 25 operations. It's just an extra \$20 per everybody to do
10 testing. And it's like, well, you know what, maybe we
11 should be looking at it from a risk-based lens a little bit
12 more, and that's indirectly through these fee schedules.

13 So I wanted to bring that up when we're looking at
14 this one-size-fits-all approach that certification fees do
15 matter. Paying, you know, a different -- different rates
16 for the riskiness of your business is important, not
17 necessarily just based on your gross revenue sales. Just
18 because you're a big operation doesn't necessarily mean
19 you're risky.

20 Okay, I'm going to turn it over. Well, I guess I
21 have one more --

22 BD. MEM. SMITH: Okay.

23 NOSB CHAIR BRUCH: Oh, yeah. Go ahead.

24 BD. MEM. SMITH: So moving on to the -- the next
25 slide, the public access piece. So there was two parts of

1 this. There's a couple parts in the regulations that talk
2 about providing residue results to public -- the public.
3 One is in 670 and just says that they need to be provided.
4 The other part is in 504(b)(5)(iii), and so that's the
5 certifier accreditation requirements on having procedures to
6 provide these results when requested. And those aren't,
7 like, linked together at all. And so it was unclear on
8 whether or not 670 was intended to include, like, pursuant
9 to 504(b)(5)(iii), or if they were to be provided in some
10 other manner. And so that's what we were exploring, linking
11 those together as most stakeholders thought that that would
12 be sufficient. However, one commenter did state that they
13 were unclear on whether or not that would be sufficient and
14 were sort of questioning whether or not certifiers
15 compliance with 504(b)(5)(iii) is adequate, and if all
16 certifiers are, sort of, approaching that in the same way,
17 providing the same information when requested. That's
18 something that we all flag for the Program, just as
19 something to look at, at audits and perhaps provide some
20 additional training on.

21 And the other aspect of the public -- of the
22 public access was related into a centralized database. And
23 so, you know, this community loves to talk about centralized
24 databases, but the question has always come up on who is
25 going to manage said wonderful database and be responsible

1 for it? And so, of course, those concerns were raised here,
2 as well. So I feel like there's a lot of support in having
3 some sort of centralized database in order for certifiers to
4 be able to discern patterns and trends and inform their, you
5 know, their testing programs and help with decision making
6 and in the future, could really help us, you know, hone in
7 on the whole UREC conversation. And there is in the works a
8 industry driven database. So whether or not that's going to
9 fit the bill, we will see.

10 And but, yeah, in general, there were some -- lots
11 of commenters were in favor, but again, just the who -- who
12 manages it? How does the data get in there? There was also
13 some comments around data can be misconstrued and tell a lot
14 of different stories, and so there was just some concerns
15 around having that all be available to the public. However,
16 based on the regulations, it seems challenging that that
17 would -- to limit that in some way.

18 So anyway, that's what I'll say for now on that.

19 NOSB CHAIR BRUCH: Great. Thank you, Kyla. That
20 was very well explained there.

21 I'm going to go to the next two, and again, and
22 then we'll open it up to Board deliberation. This is, as
23 most of our topics in CACS, a little bit of an omnibus here,
24 a lot of different bases to cover, but the next one, there's
25 some inter relation here. It's downstream communication, so

1 the idea, and we have received public comment on this
2 before, but should there be a system for notification of
3 non-compliant product? And the community, what we ask
4 questions on, and what there's some agreements on is that
5 willful violations absolutely are residues that exceed
6 action levels. There should be transparency of some regard.
7 There was consensus around the transparency piece. I think
8 the devil's in the details with the mechanics and
9 operationality of this. CACS provided, I believe, a great
10 matrix on the grounding with OFPA.

11 If you go to the next slide, Andrea? You can see
12 that there is some insight within the regulation on
13 triggering events that needs to be aligned, notification
14 requirements and roles, certified operation support,
15 confidentiality/liability, infrastructure and oversight, and
16 regulatory coordination. So there's a lot of components
17 that would need to be at play here. But essentially we
18 don't know what we don't know. We don't think like
19 criminals, and the criminal mind is effortlessly creative,
20 so we need to encourage the moving away from the siloed
21 approach and really share the learnings where the threats
22 are. When I did hear that comment in the public comments
23 about the number, there's 26 percent of tests that that
24 showed a problem within the 5 percent that was tested, and
25 nearly half of those needed to be excluded from sale, we

1 need to inform the downstream partners of these challenges.

2 When Dr. Tucker yesterday mentioned rebalancing
3 accountability, we're not going to be able to do that
4 without information. To build better fraud prevention
5 plans, we need the intel and insight, so we know where the
6 threats are. We only know what we know. So I appreciate
7 the communities rallying around the transparency. I
8 acknowledge the challenges by doing this. But I -- I think
9 it's something to highly consider going forward on just for
10 those shared learnings of where the threat's coming from.

11 One other public comment before I move on to the
12 next one that I'd like to elevate was just, you know,
13 there's an -- we need to be equitable here. If we're
14 testing a downstream partner, such as a handler, that did
15 not originate the threat, maybe they shouldn't be charged
16 the testing, maybe they shouldn't be charged a non-
17 compliance, but they -- we need to educate our downstream
18 partners up and down the supply chain of what threats are
19 coming to you. So if, for example, handling operation is
20 tested, they do know that they are on their toes for certain
21 suppliers or supply chains. So that information, I think,
22 is, is priceless. And we need to do a good job of
23 communication here and increasing transparency. And I do
24 hold dearly the public comments that we received here.

25 I'm going to move on to the next one real quick,

1 Kyla, just because they interested in time, and this is UREC
2 and NOP 2613 guidance.

3 Essentially what Kyla and I were trying to work on
4 here is providing some assistance for when there was an
5 inadvertent, unavoidable drift event. For example, in my
6 area, be dicamba, where I do not know where it's coming
7 from, that stuff can drift over two miles. And so there's
8 right now, there's challenges with the gap in the
9 information in the EPA and FDA tolerance table, so we know
10 what to do if there is a tolerance for something. The
11 challenge is what do we do when there isn't a tolerance, and
12 we default to the 0.01 PPMs?

13 And so that's what we were trying to address here.
14 We thought we could do it potentially with updating the UREC
15 definition, but we are going to preserve that and move
16 forward that way. We appreciate the public comments that
17 that surrounded that. We thought potentially we could
18 change the definition of drift, but it seems like that --
19 the definition as it exists is warranted. So we reemphasize
20 the need to -- the need for the Program to accept the
21 updates that were passed at the last meeting, the
22 recommendation on the -- on the updates for 2613 guidance on
23 how to respond to results.

24 The community overall supported our work from last
25 semester, and I think that's the best option. It's not an

1 easy option, but I think it's the best option to handle the
2 gaps there that exists for not having a tolerance in the FDA
3 or EPA tables.

4 So, cruised through that lot there.

5 BD. MEM. SMITH: So, yeah. thanks. I just --
6 I'll open it up for comments or -- yeah, discussion and
7 questions. And I just wanted to state that CACS has been
8 already discussing the public comments and drafting up a
9 proposal to be voted on next week. So, right before Amy and
10 I leave, we're just going to put in a proposal, anyway. And
11 so we're gonna incorporate the discussion that we have here
12 today into that proposal. And the idea is that we'll --
13 y'all will see this at the spring meeting.

14 So what comments and questions do y'all have?

15 Nate.

16 SECRETARY LEWIS: On the topic of cost, did the
17 Subcommittee talk at all about the potential for shifting
18 some of that cost, whether it's, like, above the testing
19 above 5 percent requirement or some percentage to the NOP
20 via, like, a credit on accreditation fees? I just -- I love
21 diving into the parts of the Rule that we don't really think
22 about and see what sort of tools there are there. So,
23 right, certifiers write a check every two and a half years
24 or whatever to the NOP for their accreditation. Is it
25 legal? Is there a possibility to, like, get some credit

1 there? And when I was on CACS, that was something I was
2 like, oh, this would be a cool thing to explore. And I'm
3 just curious if the Subcommittee had explored that, or
4 whether the Program can weigh in on whether there's even any
5 room to think about that? But I just love making the
6 government pay for stuff if we can, you know, not farmers,
7 not certifiers. And there's a little mechanism that I
8 thought might be an interesting way to leverage that.

9 BD. MEM. SMITH: No. I would say I don't think we
10 really explored that. Although there were definitely some
11 stakeholder comments that basically were like, NOP should do
12 all the testing. So, I don't -- anyway. So, yeah, I mean,
13 I feel like that could be something that we could look into
14 a bit more.

15 Any other comments, questions?

16 (No response.)

17 BD. MEM. SMITH: Okay, well, you'll see this again
18 in proposal form.

19 NOSB CHAIR BRUCH: Excellent.

20 BD. MEM. SMITH: Back to you, Amy.

21 NOSB CHAIR BRUCH: Okay. Thank you, Kyla, so
22 much. Thanks for listening to this report. Please reach
23 out to Kyla and I if you do have additional thoughts on
24 this. I know time is limited to exchange those, but please
25 reach out to us and we will do our best also to incorporate

1 the round of public comments that we did receive.

2 And I just want to thank you, Kyla, for your
3 leadership, both within the Subcommittee and across the
4 broader committees that you're on in public. You're truly a
5 champion, and I appreciate that.

6 As a fifth-year board member, I just wanted to
7 pause briefly to reflect on the great work that CACS has
8 done. My heart has been with this team for the last five
9 years. I'm deeply grateful to all that have served on this
10 committee, both past and present, and I'll be cheering you
11 on in the future as you work to continue turning the
12 community's real concerns into positive change.

13 A few of those moments that we had just to
14 highlight was Organic is Regenerative; the letter to the
15 Secretary to add acreage reporting on organic certificates;
16 crop insurance reforms for organic farmers; consistent
17 location identification, a.k.a, geocodes; that was a
18 recommendation brought to the Program from the subcommittee.
19 And also there was a reference to this yesterday, but
20 developing the Organic Links discussion document to explore
21 supply chain traceability. And it's a topic I hope future
22 boards will take up.

23 But thank you so much. Appreciate that. And
24 without further ado, we are going to turn the mic over to
25 Franklin for our next subcommittee update. Thank you,

1 Franklin.

2 BD. MEM. FELDER: (No response.)

3 NOSB CHAIR BRUCH: Franklin? Are you here with
4 us? Oh, there you are. Wonderful. Thank you.

5 BD. MEM. QUARCOO: Give me a second.

6 (Pause.)

7 BD. MEM. QUARCOO: All right, so welcome to the
8 Materials Subcommittee. The one and only item on the list
9 for today is a discussion document on induced mutagenesis.
10 And -- just a second. And this topic of induced
11 mutagenesis, we've been on it for a while. We've had other
12 members -- previous members, who have worked on it, notably
13 Mindee and others who have worked on it. Currently, we have
14 Kathleen, Dilip, and Brian, who have working -- who have
15 been working on this for a while. And I'll hand over to
16 that team, the working group, Kathleen, Dilip, and Brian, to
17 lead us through the discussion on induced mutagenesis.
18 Thank you.

19 BD. MEM. CALDWELL: All right, well, thanks,
20 Franklin, I'm going to take the lead on this. I hope that
21 Cat can -- gets away from her meeting and maybe join us at
22 some point. But the discussion document that we put out was
23 basically sort of a round-robin handoff, back and forth
24 between Dilip and Cat and myself. And I think we might have
25 some time to make up some -- or a chance to make up some

1 time here, so I'm going to just try to bang through it and
2 see what happens.

3 But, anyways, so induced mutagenesis has been on
4 the Excluded Methods TBD list for some time because it
5 raises really difficult questions. And, of course, TBD, to
6 be determined. It's been in limbo for many years. So our
7 Materials Subcommittee tried to address that and solicited
8 input from the organic community in two discussion
9 documents, including this one, and one before this, and we
10 received a lot of really excellent responses. Really
11 appreciate that.

12 In this most recent discussion document we began
13 with the definition of excluded methods in the NOP
14 regulations, and there are three clauses, which we call
15 prongs to this, which were connected by the word "and," so
16 all three of them must be satisfied in order for something
17 to become classified as an excluded method. Those are, "The
18 methods are used to genetically modify organisms or
19 influence their growth and development." And when you say
20 genetically modified organism, it sounds like genetically
21 modified organisms, like a GMO, but that's not really what
22 this wording means here. It means that the methods used
23 result in genetic changes in the organism, not necessarily
24 in transformative, you know, operations inside labs and that
25 sort of thing, as is typically typical in GMOs. And it also

1 includes the words "or the methods influence their growth
2 and development." So that's prong one.

3 Prong two is that it does this by means that are
4 not possible under natural conditions. And at this point, I
5 think it's really important to emphasize that we're talking
6 about means and not ends. Sometimes in the past, people
7 have said, well, it's possible to obtain such and such a
8 result naturally, even though it might take, you know, 50
9 years or something like that, so it should be allowed.
10 Anyways, that's not what we're talking about. We're not
11 talking about results, we're talking about the means used.
12 So that's prong two.

13 And then prong three is that the means are not
14 considered compatible with organic production. And that's
15 kind of a -- we have that in kind of everything we do.

16 Okay. Then we, sort, of mapped out some possible
17 scenarios depending on whether induced mutagenesis was
18 considered an excluded method or not, what would the
19 implications of that be? And that was, I think, really the
20 thrust of this particular discussion document. We were
21 trying to fish for people's responses either way; if it's
22 not considered excluded methods, then how things look? And
23 if induced mutagenesis is considered an excluded method,
24 then what happens? And again, we received a lot of really
25 great responses from that.

1 So, and I've got to say that I'm going to gloss
2 over basically all this today because we don't have much
3 time for a really in-depth discussion, and we will be really
4 working all the responses that we get in a future discussion
5 document or proposal. So that -- all these responses have
6 been absorbed, and I just want to say that I have summarized
7 everything from the written comments that related to induced
8 mutagenesis and will be circulating it to the full Board.
9 So that -- all -- none of that's going to be lost.

10 Let's see here. I've got to look back in my
11 notes. Okay, the -- if induced mutagenesis is not
12 considered an excluded method, basically the result is that
13 things just go ahead as normal and that they will just be
14 taken out of the limbo land and say, okay, this is an okay
15 thing to proceed with and move forward. That's not --
16 certainly the most straightforward and easiest route.
17 However, if it is considered an excluded method, then
18 there's some pretty serious implications, and virtually all
19 the commenters agreed that the implementation of prohibiting
20 seeds and varieties that are produced with induced
21 mutagenesis would be extremely difficult. Possibly
22 impractical. Not exactly impossible, but impractical. And
23 that would be for both farmers and certifiers, present a
24 real major, major obstacle to -- basically to success and to
25 compliance with such a decision. And that's really

1 important. That's kind of what we were thinking, and we got
2 strong support, you know, "yes" from the community about
3 that.

4 Okay, but the -- the other thing that was a
5 pretty -- was not universal in our responses, but many, many
6 of the responders thought that there should be some kind of
7 a grandfathering program, even if induced mutagenesis was
8 considered an excluded method, so that some or all of the
9 varieties and seeds in use right now would be grandfathered
10 in, and then as we move forward, things would change. And
11 that's really an interesting approach. And some -- there
12 were some suggestions that organic seed breeding then could
13 proceed without using induced mutagenesis, whereas, of
14 course, conventional breeding would continue to use it. And
15 that has interesting implications, again, farther down the
16 road that I don't want to get into right now, but I'm just
17 throwing out some of the ideas that people shared with us,
18 and that can give us some potential directions to go in.

19 And I just, you know, once again I want to
20 reiterate that I'm just skimming the responses that we got.
21 There were some really interesting, good ideas in there that
22 I really haven't had time to totally digest and bring back,
23 but we will be bringing them forward again. Without me.
24 But I should -- when I say "we," I mean the Board will be.

25 And I just wanted to wind up with the clear

1 statement that the Board's goal with all this input is to
2 bring the TBD methods out of limbo and to chart a way
3 forward that will be best for the whole organic community,
4 including farmers, certifiers, breeders, and consumers. So
5 that's really the goal here, and all the input is welcome.
6 It's a very thorny issue. We're just going to try to move
7 it forward as best we can.

8 And I know that was a real skimming of the
9 responses, but any questions and comments will be most
10 welcome. Dilip?

11 BD. MEM. NANDWANI: Thanks, Brian. Really
12 appreciate your work on this very difficult topic and
13 challenging topic.

14 I'd like to just add one thing -- one comment.
15 With this working group, Allison, and also Nate, they also
16 contributed reviewing the document. They're also -- and I
17 think that Franklin also provided some references. So, it's
18 a team work.

19 And the comment I wanted to make is that this
20 is -- the work group, or Materials Committee, we do
21 understand that the sensitivity of this topic, and this is
22 actually a first method we have started discussing in the
23 excluded methods. So it's very important that we hear from
24 stakeholders, and we do have some good responses, as you
25 summarized, you know, and it's a long journey. Where we are

1 going to go, it depends on those comments and the responses
2 of which direction we want to go. This is very early stage,
3 and the three prongs you have described, and also the
4 comments we have received, we are going to review that and
5 see how, you know, the stakeholders' input can help us
6 navigating this very difficult topic.

7 So I'll stop here. That's just my little comment
8 here. But thank you again, Brian, and thank you, the work
9 group. I appreciate that.

10 BD. MEM. CALDWELL: Well, thanks. Thanks, Dilip,
11 for pointing that out. Absolutely, this was a team effort.
12 And yeah, Allison and Nate contributed a lot. Franklin
13 always steers us in the right direction.

14 And I wanted to point out that the discussion
15 documents that we put out have dealt only with crops and not
16 with microorganisms. And that's a whole other huge topic.
17 And, of course, some of the decisions we make regarding
18 crops will influence what happens with microorganisms. So
19 that's -- it's really a big topic.

20 So, Franklin.

21 BD. MEM. QUARCOO: I'll go to Allison first.

22 NOSB VICE CHAIR JOHNSON: I put my hand down and
23 up again so you could go before me. Why don't you go ahead?

24 BD. MEM. QUARCOO: All right. So what I needed to
25 say, so that's why I wanted to go after you, but that's

1 okay. I just want to show my appreciation for the team and
2 the amount of work that has gone into this.

3 I know Brian was one of the original members of
4 this working group, and we will surely miss your input and
5 all the things you have brought in to get us to this point.

6 I'm curious, this being your last time being with
7 us and discussing this, did you feel that classifying
8 induced mutagenesis as a conventional breeding method put us
9 in conflict with any of the three prongs? In other words,
10 are we saying that -- so basically, if something is a
11 conventional breeding method, we don't consider it as an
12 excluded method?

13 Now, if you talk to a number of breeders, they
14 tell you induced mutagenesis is a conventional breeding
15 method. So if that is the case, then we wouldn't even be
16 thinking about it when it comes to excluded methods. Except
17 when you now go into this particular technology. The
18 chemicals and the radiation happens at levels that typically
19 doesn't occur naturally.

20 So do you -- did you at any point feel like we
21 were in conflict with these different rules, where
22 conventional -- we consider it a conventional breeding
23 method, then we shouldn't have to worry about whether it's
24 excluded, yet, based on the methods by which we are breeding
25 them, there seems to be some kind of conflict when we come

1 to the three prongs? Did you -- do you care to share your
2 views on that?

3 BD. MEM. CALDWELL: Yeah, thanks, Franklin. And
4 basically one of my feelings was that it would be best to
5 avoid trying to decide whether induced mutagenesis was
6 "conventional" or "traditional." Kind of, semantical
7 questions, and that's why I thought it was best, and we used
8 it -- we went right back to the definition of excluded
9 methods and not some of the layers that people have put on
10 top of it. Because there is -- sometimes "traditional" in
11 the plant breeding community just means non-GMO. So there's
12 a lot of, sort of, slipperiness in just basing things on a
13 certain word classification. So that's why we went down to
14 those prongs.

15 And I've got to say, from these responses that we
16 got, Number 3, which is that "In order to be considered an
17 excluded method it has to happen by means that are not
18 considered compatible with organic production," I think that
19 might be where I'm starting to feel like induced mutagenesis
20 does not meet that one. And part of the reason is that
21 there are disease-resistant varieties that have been
22 produced via induced mutagenesis. And part of it is that
23 the -- essentially, the opposite -- the converse of the
24 whole thing would be so disruptive that that would be, sort
25 of, incompatible with organic production.

1 So, again, I'm going to leave this up to the
2 future boards and future materials subcommittees to really
3 drill down fully into this, but that's, kind of, where I'm,
4 I've got to say, reluctantly, kind of, going -- moving
5 toward.

6 But thanks for that question, Franklin. That was
7 a revealing question. Allison.

8 NOSB VICE CHAIR JOHNSON: Yeah, great question,
9 Franklin, and great answer, Brian. Thank you.

10 I want to echo Franklin's appreciation for your
11 leadership on this and other excluded methods issues, Brian.
12 You've been such a thoughtful voice, both weighing the
13 practical grower side and all of your experience in ag with
14 the consumer and, you know, kind of, caution trying to do
15 the right thing with intention. So I've really appreciated
16 your leadership in this space.

17 And I think I'm leaning with you at this point.
18 There's obviously still work to do, but the overwhelming
19 support for continued use of all these varieties that are
20 the product of IM, I think, is fairly telling. These are
21 not varieties that are causing environmental damage by being
22 out there now in use, which is a concern that we have with
23 genetic engineering, where you might have things introduced
24 into the genome that otherwise couldn't happen and may pose
25 more unknown risks. That doesn't seem to be an issue with

1 products of IM particularly. And so for me, it's, sort of,
2 coming down to the National List analogy, that there are a
3 number of materials that I feel pretty uncomfortable with on
4 the National List, but they are essential to organic
5 agriculture for whatever reason. And so we, sort of, hold
6 our nose and say that the balance leans toward allowing
7 their use. I think that may be where we need to land here.

8 The other thing that continues to trouble me on
9 this topic is the enforceability issue. It really
10 doesn't -- we can't test for use of IM in a final product,
11 so finding a, like, in-between solution that is actually
12 enforceable continues to seem really challenging.

13 So, really, yeah, grateful for all the input and
14 the discussion, and I'm looking forward to continuing to
15 work through this and come to a resolution on this topic.

16 BD. MEM. CALDWELL: Yeah, thanks so much, Allison.

17 And Franklin, I don't know if you want to lead us
18 forward in anymore Q&A? Or turn it over to Amy?

19 BD. MEM. QUARCOO: In the interest of time, unless
20 there's something else, I'll turn it over to Amy.

21 BD. MEM. CALDWELL: Oh, we don't have any vote on
22 this; this is a discussion document. I'm sorry. So this is
23 just for your all digestion. And I actually think that we,
24 kind of, moved the needle a little bit, even in this short
25 discussion that we've had. So thanks, everybody.

1 NOSB CHAIR BRUCH: Yeah, absolutely. Well, thank
2 you. That was going to be my question. I know, Brian,
3 you're rotating off, and this is a really important
4 document, but it is, as I believe Dilip mentioned, kind of,
5 a total team effort, and it's been that way for several,
6 several iterations of this.

7 And my question was, you know, what do you think
8 next steps are? Because, as we noted, simultaneously
9 working on updates to this for the spring meeting. Are you
10 anticipating, Brian, Franklin, that this would be in a
11 proposal form for the next meeting here in the spring?

12 BD. MEM. CALDWELL: Well, I can't really guess,
13 but it's too bad that Cat isn't here because she has a lot
14 of expertise in this area, as well, and will, I think, be
15 moving things forward.

16 So, Franklin, any more on that?

17 BD. MEM. QUARCOO: Yeah, I was going to say the
18 same thing. I mean, like the history -- and let me once
19 again thank all the team members who've been working on this
20 for -- all the way from Mindee, Wood, and people who've been
21 working on this for a while. Logan and Brian, and Dilip is
22 still going to be onboard. But I want to say Carolyn took
23 on this. I mean, she showed a lot of interest in this and
24 is going to be providing a lot of leadership in getting this
25 over across the line. So, she has experience, she has

1 expertise. So I'm happy. It looks great from where I see
2 it, that we are going to be able to get it there. But I
3 don't want to speak for Carolyn and the rest of the group.
4 But it appears as if we should be able to have a proposal
5 ready. But I may be wrong. But I think we will be.

6 NOSB CHAIR BRUCH: All right. Well, excellent.
7 Well, thank you so much on that topic discussion. Really
8 appreciate that. I think you're right, Brian, that -- I
9 think we moved the needle a little bit on that one. I
10 really appreciate, Franklin, you chairing the subcommittee
11 and all the work that goes in on this.

12 Research priorities is another topic that
13 traditionally we discuss at a meeting, but I know that
14 that's being worked on in the background with the updates
15 from the community, so we will have a refreshed version here
16 for the spring on research priorities. Potentially get in a
17 different cadence with voting on that. But thank you.

18 This committee does a lot of heavy lifting, and
19 I'm appreciative of, Brian, your contributions here. And
20 there's a lot of succession planning to have strong
21 intellect to carry things forward. So thank you so much.
22 Thanks for leadership.

23 And we will transition to the next segment, and
24 then we'll review the Work Agenda, as you can tell on the
25 screen here. Then we're going to have a short 10-minute

1 break, followed by the back half of our business meeting.

2 So, looking at the Work Agenda here, I'm not going
3 to go through every single item; it is available online, and
4 you can see the link below. Some highlights here: we will
5 be seeing that pear ester proposal that was refreshed based
6 on some public comment that we received this round. So
7 please note that.

8 And there are a few petitions that the Crops
9 Subcommittee has also received. In addition, they'll be
10 working on the 2028 Crop Sunset substances.

11 For Livestock, we have a petition on chlorine
12 materials. We have a document that's in the discussion
13 form, and that'll be refreshed, as well; it's integrating
14 livestock in agroforestry crops. So I appreciate, Brian,
15 your leading that document. And I know the transition is in
16 progress there with Corie. So thank you so much for
17 stepping up for that one. Then there's going to be 2028
18 Livestock Sunset substances.

19 Handling, we do have another petition there on
20 chitosan, and then other -- so that'll be in the proposal
21 format, is what that is earmarked to be. And then a couple
22 other petitions that you can see there. The sodium
23 bicarbonate classification will also be a voting item, in
24 addition to the Sunsets.

25 Materials will be continuing on with the

1 discussion that we heard today with excluded methods. And
2 then those research priorities will be deliberated on in the
3 spring for CACS. The petition that will be potentially in a
4 proposal -- we have it earmarked as a proposal -- in
5 proposal form, it would have been a discussion in this
6 meeting, but there was a great amount of community input, so
7 right now we're targeting a proposal on the e-commerce,
8 followed by the conclusion in a proposal form for the
9 residue testing for a global supply chain. That's the last
10 document in that suite, and that was the omnibus that Kyla
11 and I reviewed on the 205.670 and UREC item, so we'll be
12 advancing that to a proposal and looking for a lead on that
13 in the process, as well.

14 And then our consistency in organic seed use.
15 There was great community feedback on that one, as well.
16 That will a discussion form.

17 PDS. We do have PPM updates ready to go, and
18 those were viewed into the original meeting packet, but that
19 will be voted on at our next meeting. And then just an
20 update on the Sunset Review Efficiency Process. We wanted
21 to close the loop there because it was an item that we
22 discussed in the spring, so we wanted to put an ending point
23 with that conversation, as well. So that is -- that's what
24 will be happening here in May.

25 Anyway, with that, we are going to take a short

1 10-minute break, and we'll return back with officer
2 elections and some other items. Let's return back at --
3 let's see, 47 past the hour, 10 minutes here. Thank you so
4 much.

5 (Whereupon, a brief recess was taken.)

6 NOSB CHAIR BRUCH: All right, welcome back at the
7 magical 47 past the hour.

8 We are going to be transitioning now into some
9 Administrative Board Business, with the first item up is
10 officer elections. So since we're in a virtual format and
11 we have done this in the past, we will be setting up an
12 offline, anonymous survey to tally the results. And
13 actually, I'm going to turn it over to Kyla to talk about
14 the process. It will be anonymous. We do have survey
15 links, and she will be emailing them out.

16 I'm looking for Kyla. Kyla, are you back from
17 break?

18 BD. MEM. SMITH: Here. Yes.

19 NOSB CHAIR BRUCH: Yes. Okay, I'm going to turn
20 it over to you to talk a little bit more about the process
21 and what everybody is expected to be receiving.

22 BD. MEM. SMITH: Yeah. Okay, so this is going to
23 be a SurveyMonkey survey. We're going to start with Chair,
24 and then move to Vice Chair, and then to Secretary. I will
25 send an email with a link for each of those things; we'll

1 take them in order. Every board member is listed on the
2 survey because we didn't want to have to, like, create the
3 survey in real time, so only vote for the people who are
4 nominated. I'll put that in the email. But no write-in
5 candidates here. So then -- and then Amy and I are going to
6 get the results on the back end, and then Amy will read that
7 out. If there's only one nomination, we won't do the vote,
8 and they just automatically get the job.

9 So, I think that's it. Amy, back to you to
10 facilitate the nominations.

11 NOSB CHAIR BRUCH: Yes, thank you, Kyla.
12 Appreciate that. And Kyla and I will be working in the
13 background because we will be not necessarily participating
14 in the next board term, so we're more just supportive in
15 this role.

16 So I am going to open it up to the floor for
17 nominations for Chair of the National Organic Standards
18 Board. I do see a hand, Franklin.

19 SECRETARY LEWIS: I would like to nominate Allison
20 Johnson for Chair.

21 BD. MEM. SMITH: Thank you, Franklin. I
22 appreciate that.

23 And then one comment; you can also nominate
24 yourself as well, so think about that. I see another hand
25 up here. Dilip, go ahead.

1 BD. MEM. NANDWANI: Well, I'll take it back
2 because I wanted to nominate Allison Johnson for Chair, so
3 Franklin already mentioned. So.

4 SECRETARY LEWIS: Excellent. We have a second.
5 Okay. Any other nominations here?
6 (No response.)

7 NOSB CHAIR BRUCH: Well, I'm not seeing any hands.
8 I'm excited to announce that our new Board Chair is Allison
9 Johnson. Thank you so much.
10 (Zoom applause.)

11 NOSB VICE CHAIR JOHNSON: Thank you all.

12 NOSB CHAIR BRUCH: Allison, do you accept the
13 nomination? I should have asked that first.

14 NOSB VICE CHAIR JOHNSON: I humbly accept. Yes.
15 Thank you so much. I'm looking forward to working with you
16 all this year.

17 NOSB CHAIR BRUCH: Oh, excellent, Allison. I'm so
18 excited for you. I really appreciate your service as Vice
19 Chair. Thank you so much.

20 All right, I guess, Kyla, we will not be using our
21 SurveyMonkey for Chair.

22 All right, I'm going to move on to the next seat,
23 Vice Chair. The incumbent was Allison Johnson. Is there
24 any nominations for Vice Chair? Andrea, go ahead.

25 BD. MEM. HATZIYANNIS: I would like to nominate

1 Amanda Felder for Vice Chair.

2 NOSB CHAIR BRUCH: Excellent. Amanda, do you
3 accept the nomination?

4 BD. MEM. FELDER: (No audible response.)

5 NOSB CHAIR BRUCH: Excellent. I caught that as a
6 yes.

7 BD. MEM. FELDER: Sorry. Gotta love technical
8 difficulties.

9 NOSB CHAIR BRUCH: No problem. Just want to make
10 sure we all heard that. Okay. Excellent.

11 Any other nominations? I'm scanning the tiles
12 here.

13 (No response.)

14 NOSB CHAIR BRUCH: Okay. I am not seeing any. So
15 again, we're put our SurveyMonkey aside. And I am excited
16 to announce that Amanda Felder is our Vice Chair for the
17 upcoming year.

18 Excellent. All right, for our overall board
19 leadership, there is one more position. We have, Secretary.
20 Really appreciate the service that Nate has provided in that
21 role. I'm going to ask for nominations. I see Amanda's
22 hand up.

23 BD. MEM. FELDER: And we'll extend the gift back
24 and nominate Andrea for this position.

25 NOSB CHAIR BRUCH: Excellent. Andrea, do you

1 accept the nomination?

2 BD. MEM. HATZIYANNIS: Yes.

3 NOSB CHAIR BRUCH: Excellent. I see another hand
4 up. Kyla, go ahead.

5 BD. MEM. SMITH: Just to make it interesting,
6 right, can't have a clean slate. Kathryn is my mentee, and
7 I think that she would serve well in this role, as I do
8 think Andrea also would. But again, let's just have -- I
9 created this email -- we created these surveys, we've got to
10 use them, right?

11 NOSB CHAIR BRUCH: Absolutely. Let's test out the
12 process. Okay, Kathryn, do you accept the nomination?

13 BD. MEM. DESCHENES: Sure.

14 NOSB CHAIR BRUCH: Okay, we're going to translate
15 to a "yes." All right.

16 Any other nominations for Secretary?

17 (No response.)

18 NOSB CHAIR BRUCH: Okay. Excellent. Well, really
19 appreciate the nominations here for Secretary. We do
20 have --

21 BD. MEM. SMITH: I sent the email --

22 NOSB CHAIR BRUCH: -- Andrea. Okay.

23 BD. MEM. SMITH: You should have all received it.
24 If you didn't check your spam. I don't know.

25 (Pause.)

1 NOSB CHAIR BRUCH: Okay, I did receive it, Kyla.
2 I'm going to take a quick moment here.

3 BD. MEM. NANDWANI: I did receive two.

4 NOSB CHAIR BRUCH: Okay. Excellent. Then again,
5 we are going to be the -- there's all the names on your
6 survey, but our nominations for Secretary are Andrea and
7 Kathryn. No write-ins here, folks.

8 (Pause.)

9 NOSB CHAIR BRUCH: Okay, we will work to tabulate
10 the information.

11 (Pause.)

12 BD. MEM. SMITH: How many are there of us at this
13 moment? Are there --

14 NOSB CHAIR BRUCH: Yeah. It's good -- based at
15 roll call, let's see, Michelle has --

16 BD. MEM. SMITH: Okay, I think everybody voted.

17 NOSB CHAIR BRUCH: Okay. Excellent.

18 BD. MEM. SMITH: Amy, are you going to get to the
19 results?

20 NOSB CHAIR BRUCH: What's that?

21 BD. MEM. SMITH: Did you get to the results?

22 NOSB CHAIR BRUCH: I will here in just a second.

23 We'll add to the suspense here. I just wanted to
24 make one quick announcement. I really do appreciate the
25 stepping up to the plate for the upcoming New Class. Well,

1 I guess, again, I think the term "new" is no longer
2 appropriate. So really appreciate everything that -- all
3 the contributions that we've seen here today.

4 And I am excited to announce that our new Board
5 Secretary is Andrea. So thank you very much. Thank you
6 Kathryn for putting your name in the hat for Secretary. I
7 really appreciate that, too.

8 And I'm excited to announce that our official 2026
9 Officers are Allison as Chair, Amanda as Vice Chair, and
10 Andrea as Secretary. Excellent.

11 NOSB VICE CHAIR JOHNSON: It's the Triple A.

12 NOSB CHAIR BRUCH: Oh, wow. Good call-out.

13 DR. TUCKER: This is Jenny. Jenny jumping in just
14 to say congratulations to our new officers, and we look
15 forward to working with you.

16 NOSB CHAIR BRUCH: All right. Well, excellent.
17 I'm looking forward to a brief transition, so I think my
18 class is rotating off, I believe, on the 23rd, officially,
19 so just right around the corner. So we will work quickly on
20 our transition here.

21 Okay, congratulations, everybody. I'm excited for
22 the next year of the Board. It's in good hands.

23 All right, now the next item on the list, I guess,
24 it looks like I'm going to be turning this over to Dr.
25 Tucker for recognition of outgoing members.

1 DR. TUCKER: Okay, first of all I want to thank
2 everybody for the incredible, productive, and incredibly
3 smooth meeting. So congratulations to all of you. I know
4 for some of you were doing things for the very last time,
5 and I'm sorry that we are not able to do hugs in person,
6 here.

7 So I'm going to -- just different doing it online,
8 so if I forget something, somebody tell me. I'm going to do
9 the recognitions in order of how folks are listed on the
10 slide. So, I will start with Amy, and then Brian, Carolyn,
11 Logan, and Kyla.

12 What I would like to do is, just say a few words
13 about each person, and then whatever parting comments people
14 would like to say, I will invite you to do that. When you
15 do that, you can also, when you're starting, if you want to
16 hold up your plaque. Some of you have your plaques with
17 you, and some of you may not. But we get -- everybody gets
18 an outgoing plaque, and so if you do that, if you hold it
19 up, do just pause for a minute in case folks want to take a
20 picture, they're able to do that.

21 So last year, around this time when we were saying
22 good-bye to folks, I started something new and I really
23 liked the way it worked out. You know, I have my own
24 perspective on each of these individuals. I've now worked
25 with them for five years. I remember making the phone call

1 to each of them, telling them that they had been appointed
2 to the Board. This is actually the last group that was
3 appointed under the first Trump administration, so it is a
4 notable transition, also just given the change -- the recent
5 change in administration.

6 Before I go to the individual ones, what I've --
7 what we've done in -- what we did last time was I, kind of,
8 crowdsourced input from the entire NOP team here. And I did
9 that again this time. So that will, kind of, the core of my
10 comments. It's not just about me; it's also about what the
11 team says. For me, I have very personal and special
12 memories of each of you.

13 I did -- so Michelle did something different this
14 time. Instead of sending a note about each one, she sent
15 just a lovely, lovely tribute to the full group, and so I'm
16 going to read that, just because I -- it made me tear up in
17 remembering some things I hadn't. And so I want to share
18 this before we start the process with -- with Amy will be
19 our first farewell here.

20 These five -- Michelle writes, "These five members
21 began their terms during the pandemic, and didn't mean --
22 meet face-to-face for the first year and a half, yet they
23 were able to forge collaborative relationships and jump
24 right into their roles and work. During their Board tenure,
25 they've all experienced just so many life events;

1 celebrations, births, moves, promotions, injuries, and loss.
2 Through it all, they have shown such kindness, grace, and
3 generosity to each other. I know -- I appreciate the
4 support and friendships as I've grown to know them as
5 humans, and I just want to thank them for being awesome."

6 Here at the NOP, we do have a terminology that
7 when you leave and you're somebody really special, we just
8 you "a good human." And so I think all of you are just good
9 humans, and that email, kind of, summed that up beautifully.

10 So I'm going to start with Amy. And so, Amy, let
11 me tell you what the team had to say about you. I asked
12 them for phrases and terms, okay? "Enthusiastic farmer.
13 Passionate. Committed. Caring leader. Deeply committed
14 with a global perspective, and absolutely committed to the
15 fair treatment and respect for farmers." So I thought that
16 was a really nice summary from folks.

17 I have very much enjoyed working with you; not
18 only as the Board Chair, but as a Board member before that.
19 And in other projects outside board activities. So, I agree
20 with all of those. I get described as intense a lot, and I
21 think that that's actually a good adjective, and I would use
22 it with you, too, and it's a compliment. That intensity
23 drives things forward. And so keep the faith, keep go --
24 keep moving forward.

25 And so Amy, do you -- would you like to say a few

1 words and maybe hold up your plaque, if you have it?

2 NOSB CHAIR BRUCH: Wow. Okay. Thank you. That
3 was very thoughtful comments. I actually do not have my
4 plaque right in front of me. I apologize. I did receive
5 it, but I am not at my home base at this moment. But I
6 should probably travel everywhere with it, because it --
7 it's been a heck of a, heck of a ride here with everybody.
8 And I appreciate the welcoming environment that I was
9 received in. On the board, I didn't have a grounding of
10 what I was gearing up for, so it was pretty foreign
11 territory for me, and a lot of you took me under your wing
12 and shepherd me, and gave me grace when I needed it.

13 I appreciate those words Dr. Tucker. I guess,
14 always try to do my best. And that I do extremely care
15 about this community and this program. And it's really
16 important. And I -- I take -- take your words very
17 seriously and to heart. And I do, at some times, have a
18 one-track mind, I think, on some of my objectives and
19 missions, and it can be probably intense, but I -- I do that
20 with love. And thank you guys for taking me in and accepting
21 me for who I am. Also, I want to say it's definitely not so
22 long, or it's definitely not goodbye; it's so long. See you
23 soon. I'm looking forward to working with all of you in a
24 different form and function.

25 You included, Dr. Tucker; our relationship keeps

1 continuing. I appreciate your accessibility, your
2 mentorship and leadership, and your heart. I know you care
3 about the Program. You're an exceptional leader, but you
4 also have the heart for doing the work. And we're excited
5 to have you back into our world and excited for what's to
6 come. It's not going to be easy, but I'm excited to keep
7 working on things that we're faced on together. And I think
8 that's life of a farmer, too. It's never easy, but we just
9 keep going forward and try to make improvements every day.

10 Kyla, thank you so much. I've loved our
11 synergistic world and relationship and being able to
12 unpack things of what can we do? What's possible? And,
13 you know, stay within the framework of OFPA and regulations.
14 So I appreciate you holding me to, you know, ideating
15 solutions that are in our control. And that's been a joy.

16 Carolyn, I really appreciate our conversations.
17 This is, I think, the best; we show up and be candid with
18 each other. And I think at the end, the results that are
19 produced are better because of the different viewpoints that
20 we sometimes bring to the table. We end up at a better
21 spot. So I really appreciate the ability to have open
22 conversations and learn the academic world and economic
23 world and how that impacts our community, and, you know,
24 just translating that to the farmer output. So thank you so
25 much.

1 I'm going to go around the world here. Brian, I
2 really appreciate learning from you. There was no issue too
3 hard to face, and I think that that's just a motto that I'll
4 try to keep with me going forward. And I just loved
5 learning about your farm and your world and all of what you
6 bring. And thank you for just being a part of the community
7 as long as you have, and the institutional knowledge, both
8 from the academic world and the farming world, that you
9 would bring to our conversations.

10 And Logan, dear friend and farmer friend of mine,
11 I just feel like no matter what zip code our farmers are
12 located in, even overseas, there's a connection that we all
13 have. And it's just been fun. There isn't a lot of organic
14 farmers in my zip code, so we have a strong bond when we go
15 through this profession and do these types of activities.
16 And it's just been a joy to get to know Logan and then
17 process, kind of, our personal life together. We, kind of,
18 had some dueling personal moments with some children that
19 were added to our family, so that was always great to learn
20 behind the scenes. Because I think on my -- my son, Beckham,
21 my first son, I think I was pregnant really the whole time I
22 was on my first year, and nobody knew it until maybe days
23 before I had birth. I think we had the fall meeting and
24 Beckham was born maybe a couple days later, and that was a
25 product that we were all virtual, so nobody knew what was,

1 kind of, underneath the chin here. But Logan actually did,
2 and Michelle, so thank you, guys.

3 Let's see, I think I have highlighted all my class
4 there, but I wanted to loop around to Michelle. You help us
5 be the best we can every day and make sure that we're
6 prepared. We have so many things going on in the background
7 and you are the glue that really holds us together. So
8 thank you for keeping us organized. Thank you for your
9 grace. Thank you for the reminders and really being the
10 continuity to hold our team together. Thank you so much.

11 I treasure all of you so much. I'm going to stop
12 there. Thanks.

13 DR. TUCKER: So folks can do the reaction in Zoom
14 or just clap with me, whichever you prefer. And Amy, again,
15 thank you for your service and congratulations.

16 (Zoom applause.)

17 DR. TUCKER: Okay, next we're going to move to
18 Brian. And so actually, I was mentioning I remember calling
19 every single one of you. And Brian's immediate reaction
20 was, "Wow. Really?" And I just laughed when I told him he
21 had been appointed, "Wow. Really?" It was such a great,
22 great reaction.

23 And so comments from our team on -- about Brian,
24 "Curious mind. A real curious mind and critical thinking
25 approach. Passionate advocate for animal welfare. Doesn't

1 shy away from complex issues, but is incredibly thoughtful,
2 reasonable. Again, strong, critical thinking." I would
3 add, just very kind and generous with praise for the
4 community and for the other people that he is around and
5 with.

6 So Brian, congratulations. I can't see you on my
7 screen. Let me scroll over. Oh, there you are. Hi, Brian.

8 So Brian, would you like to say a few words? I
9 don't know if you have your plaque with you, if you would
10 like to hold it up for the community to -- and your
11 colleagues to see?

12 BD. MEM. CALDWELL: You know, I'm holding it and
13 it's invisible.

14 DR. TUCKER: Yeah, because you have your
15 background on. Yeah, it's not -- yeah, that's not going to
16 pick it up because it's glass, so the background won.

17 So Brian, it's been an honor working with you. Do
18 you want to say a few words?

19 BD. MEM. CALDWELL: Yeah. Thanks so much, Jenny.
20 I really appreciate those words. And I was totally shocked
21 when you gave me a call, I got to say.

22 I can make this quick, I hope. But this is the
23 most collegial, committed, caring, and talented group of
24 people that I've ever worked with over my whole career. And
25 that includes a lot of really wonderful people at Cornell

1 and throughout the organic community. But I'm just totally
2 in awe of you all, and my -- some of the previous board
3 members that I worked with. It's been really a great honor.

4 So, and I believe this is a model of how that I
5 hope a lot of our government would work. This seems like an
6 amazing government private-partner -- private-public
7 partnership that is so good.

8 Let's see, I wrote things down so that I really
9 wouldn't forget anything. The -- I want to thank the
10 active, engaged organic community that is really the
11 upswelling basis for everything that we do on the NOSB. And
12 that's -- it's amazing and it's wonderful. And I've seen
13 it, sort of, grow from my standpoint over many years. And
14 it's really super strong and super good.

15 I want to thank Jenny Tucker, whose leadership and
16 guiding spirit, I believe, has -- it permeates through the
17 whole Program through to us and the NOSB, and I'm really
18 grateful for that. It's wonderful, Jenny. Thank you so
19 much.

20 And also Michelle -- sorry. Very kind person,
21 super capable, super hardworking, keeps us all in line.
22 It's amazing.

23 And again, a deep thanks to my fellow board
24 members. So much appreciation.

25 I wanted to give special mention to two retired

1 board members who really taught me a lot. And the first is
2 Steve Ila. Steve was the board president when I joined.
3 And he -- I believe he's a born leader, and he really set a
4 positive and caring tone for all our interactions and for us
5 to move forward. It's really wonderful.

6 And the other is Mindee Jeffrey. And Mindee is an
7 amazing person, always so positive and so rock solid,
8 grounded in democracy. That's Mindee. And I never have met
9 anyone like Mindee. And I think she's just so amazing.

10 Finally, I just want to say once again, I'm really
11 grateful to have had this opportunity and wish everybody the
12 very best. So thanks so much.

13 DR. TUCKER: Brian, thank you so, so much for
14 everything.

15 Folks, you can react on Zoom or just clap with me
16 by waving your hands. Brian, again, thank you. Okay.
17 (Zoom applause.)

18 Okay, next, Carolyn Dimitri. So Carolyn, words
19 from the Program, "Analytical thinker." I love this one,
20 "Considerate conversationalist." I just saw you in person
21 last week, and that just struck me as such a lovely, lovely
22 phrase because it was just a very gentle, collaborative,
23 collegial conversation, sort of, in and out from personal to
24 work, to personal to work. It was just a lovely, lovely
25 conversation. So I love the person who captured that phrase

1 of "considerate conversationalist." "Defender at good
2 process." And I love this one too, "Really good at
3 balancing and connecting the macroeconomic power dynamics
4 with granular organic issues." I thought, man, what a
5 wonderful way of, kind of, capturing that macro,/micro
6 intellect. Your experience as being part of the USDA system
7 I think also brought a spirit of some pragmatism. There
8 were times where you said things during meetings where I
9 thought, man, I'm really glad she said it because I
10 couldn't. And so you've done beautifully at bridging a lot
11 of different communities and perspectives and just bringing
12 such a thoughtful voice. So Carolyn, thank you very, very,
13 very much.

14 Do you want to hold up your plaque and say a few
15 words?

16 BD. MEM. DIMITRI: I believe my plaque is in my
17 office in New York City.

18 DR. TUCKER: Okay.

19 BD. MEM. DIMITRI: And I'm --

20 DR. TUCKER: You're not.

21 BD. MEM. DIMITRI: No. Yes, so I can't show you
22 my plaque.

23 But Jenny, thank you so much for those wonderful
24 words from the NOP staff. That is very kind and gracious,
25 and I'm really grateful to hear their thoughts (audio

1 distortion) so it's --because, as many of you know, I worked
2 for USDA before, so it's like when I went to NYU, I had to
3 learn how to be myself and have my own opinions and feel
4 that I could share them. And then to be, sort of, adjacent
5 to the NOP and watch the USDA staff operate, I just got a
6 sense of, like, how challenging it actually is. Because I
7 think so many of the NOP staff are really driven by, like, a
8 commitment to organics, but within this system, that, sort
9 of, allows you to say only a few things.

10 So this has been, like, a life-altering experience
11 for me. I feel so lucky to have met every one of you and
12 all of the people that were on the board before, people that
13 I -- like, I wouldn't have encountered most of you, except
14 in the context of this board, and to be connected by this
15 commitment to organic as something to heal the planet and
16 feed people and support the farm sector and support just all
17 the people, is -- it's like amazing to see so many people
18 who are willing to volunteer all of their time on top of
19 their jobs to do this.

20 And I also really appreciate getting to know,
21 like, much more deeply many of the people in the greater
22 organic world, which I know some of my fellow classmates,
23 you know, kind of, came out of that world and they had a lot
24 of connections already, but for me, I had always just sort
25 of observed them intellectually as like, these are the

1 advocates and this is what the advocates do. And to
2 actually be able to do research with the advocates or talk
3 to people the -- to people and, sort of, understand, like,
4 how we can move ahead in a way that's productive and
5 fruitful. You know, the drive to make the world a better
6 place, I think, like, underlies what so many of the people
7 I've met through this experience is motivating. And it's --
8 I don't know, I feel, sort of, very humbled by it.

9 And I will also echo Brian's comments that Steve
10 Ila made my transition onto the board so much easier than it
11 could have been given that we were in the lockdown of the
12 pandemic and his really gracious way of making everyone feel
13 included. And so I feel like I also met like some people
14 that I can really look up to and try to emulate.

15 So thank you all. I really hope that we stay in
16 touch and good luck next year. I won't be -- I'm happy that
17 my term is over. It was a long five years, but I'm glad that
18 I've done it, and I'm glad to have met all of you.

19 And Jenny, again, also, we missed you last year,
20 so it's nice to have you back.

21 Oh, I also have to send the love to Michelle.
22 Okay, Michelle.

23 DR. TUCKER: Thank you so much, Carolyn.

24 Let's give Carolyn a big round of applause or Zoom
25 reactions, whichever you prefer.

1 (Zoom applause.)

2 DR. TUCKER: Okay, I guess Logan is not on with
3 us, but might join us, so I'm going to actually move to
4 Kyla, and then we'll see if Logan joins us. You know, last
5 time we were missing somebody, I still said a few words
6 about them, but I'd like to see if Logan joins us.

7 Let's move to Kyla. Words for Kyla from the NOP,
8 "Versatile, dynamic, collaborative, provides such thoughtful
9 insight. In her year as being chair, she showed excellent
10 leadership and is a true mentor, shows true mentorship, and
11 that she explains certification in easy to understand ways."

12 So, you know, I knew Kyla before she joined the
13 board, so I knew all of this five years ago. But I wanted
14 everyone to have the chance to work with Kyla for the last -
15 - for her time on the board. It was just such a nice
16 encapsulation of the gifts that she brings to this board.
17 But also the broader certifier community where she truly is
18 the leader. And I think she's done a lovely job of working
19 to bridge between the certifier community and NOSB during
20 her time on the board.

21 So Kyla, congratulations. Would you like to say a
22 few words? I hesitate to ask you to hold up your plaque
23 given the lack of success on that one. So, but if you have
24 it, you're welcome to try and see what happens.

25 BD. MEM. SMITH: If you have it, I feel like if

1 you hold it in front of your face sometimes it works.

2 DR. TUCKER: Yeah. There you go. Stop. And this
3 way people can, kind of, see what it looks like. It is a
4 lovely, kind of, glass and wood background with information
5 about her service. So thank you, Kyla.

6 BD. MEM. SMITH: Yes.

7 DR. TUCKER: Kyla, you want to say some words?

8 BD. MEM. SMITH: Yes, thank you. Have my tissues
9 ready because I get emotional at these things, as you
10 probably have witnessed for my time.

11 Having the opportunity -- so here I can't even get
12 out the first sentence. Having the opportunity to serve on
13 this board and represent my fellow certifiers has truly been
14 the honor of my life. I know I've shared this story before,
15 but it was so integral in my path that I feel like I need to
16 share it again.

17 So my first NOSB meeting was in Madison,
18 Wisconsin, in fall of 2010, and it was so memorable for so
19 many reasons. First of all, it was my first public comment,
20 which I was told on the plane, you will be giving a public
21 comment, so I was, like, shaking in my boots. This is the
22 first time I was meeting certification goddesses whose names
23 I had only seen on the ACA Listserv. So I, like, walk into
24 a room, and there's all of my certification, like, heroes,
25 like, in this room. There was singing public comments.

1 There were commenters getting called back up to the podium
2 after public comments were, like, over, which, like, I don't
3 think has ever happened again. There were friendly
4 amendments. I mean, like, it had all the things. And I was
5 hooked from that very first moment. And so it was a career
6 goal of mine to be able to participate in policy making at
7 that level because I could see that there was, like, some
8 real work being done. I think that was when yeast also got
9 a commercial availability annotation, and there was, like,
10 cheers. And, I mean, it was -- anyway. So many things
11 happened at that meeting.

12 And so I know that we talk a lot about the
13 certification and inspection process, and clearly it is such
14 a critical piece of the puzzle and all the work that we do.
15 And I really hope that in my time I've been not only able to
16 represent my certification community, but also been able to
17 explain certification for those who don't have that
18 knowledge and, like, hope -- like, crack the nut open, like,
19 a little bit to give some perspective to those who don't
20 participate in the industry at that level, because it is
21 such a critical piece of the puzzle. Without certifiers and
22 inspectors, we wouldn't be able to do what we do. And I'm
23 sure that I've not always gotten it right, but I'm really
24 grateful for everybody's trust and support and collaboration
25 and feedback and celebration the victories that we've been

1 able to achieve these past five years. And there have been,
2 like, so many, we've accomplished quite a lot, and the work
3 is never done. And -- but I definitely can recognize the
4 progress that the industry has made.

5 I said in my opening remarks that my favorite
6 thing about the organic industry is the people and the
7 connections, and now I have lifelong friends and more
8 members of my organics family. And I was able to deepen my
9 relationships with a lot of folks who I already knew, but
10 deepen them into at a whole new level. And so I really
11 appreciate, again, all the members of the board that I
12 was -- have been privileged to serve with. I've been able
13 to, like, learn from each and every one of you from the
14 stakeholder community and from the NOP staff. Again, thanks
15 so much for the collaborative nature and the partnership in
16 the process.

17 I highly recommend board service. Like, highly.
18 It is a lot of work, but if ever you have been sitting in
19 the gallery and have thought, like, oh, man, that was
20 interesting, or, like, policy, like, conversations make your
21 heart sing, just do it. It is so worth it. And we really
22 need incredible people, all of you out there, to participate
23 in the process. So, anyway. Thanks. It's been such a
24 pleasure.

25 DR. TUCKER: Kyla, thank you so, so much. So a

1 big round of applause. Zoom applause or Zoom electronic
2 applause for Kyla. And Kyla, thank you so, so, so, so much.
3 (Zoom applause.)

4 DR. TUCKER: Kyla, will I see you next week for a
5 hug?

6 BD. MEM. SMITH: You bet.

7 DR. TUCKER: Okay. So I will -- Kyla and I will
8 do a big hug in Albuquerque. We have certifier training
9 next week. So, yeah, it's interesting doing these, kind of,
10 back to back. They do, kind of, blend in interesting ways.
11 So, Kyla, thank you again for being the bridge there.

12 I don't see that Logan has joined; am I correct?

13 NOSB CHAIR BRUCH: That's correct.

14 BD. MEM. SMITH: I did text her and see if she was
15 going to jump back on, and I didn't get a text back, so.

16 DR. TUCKER: Okay. Well, how about -- you know,
17 last year we had a missing member, too. And, you know,
18 life -- life happens. And I would like to at least read
19 into the record NOP's feedback for Logan. I think what we
20 did last year for our missing member is we also opened the
21 floor for any members who would like to say something brief
22 about Logan. So she can't say goodbye for herself, but
23 maybe if folks want to add a couple words once I'm done,
24 we'll make sure that she is also fully, fully appreciated
25 here.

1 Comments from NOP on Logan included, "So
2 resilient. Such a strong defender of farmers. Generous in
3 sharing her first-hand experience in a kind and accessible
4 way. Farmer, entrepreneur, super mom; fits 48 hours in a
5 day." There's also, I thought, a thoughtful comment that,
6 you know, "Logan is farming organically in areas where there
7 aren't a lot of organic farms because it's really hard, and
8 she has brought a real unique perspective due to the
9 geographies that she has worked in, but she always does it
10 in a very respectful and pragmatic way."

11 Which actually leads to my observation about
12 Logan. I really -- a few years ago, really appreciated the
13 fact that she is not afraid to stand up for her view and not
14 afraid of the tough and unpopular vote. And I think that
15 takes courage on this board. Not everything needs to be
16 unanimous. Sometimes that dissenting voice is -- it's just
17 vital to the conversation. So -- and Logan did that with
18 class and grace and was never, never afraid to do that,
19 which I really admired. So I'm going to again thank Logan.

20 I'm going to open it up to the Board; anybody on
21 the Board like to say a few words that Logan will hear and
22 will read in the transcript?

23 So, Brian, would you like to say a couple words,
24 then Franklin and then Kyla.

25 BD. MEM. CALDWELL: Yeah. I just want to say that

1 I was always glad when Logan got asked a question about
2 production methods or agronomy or soils, because I always
3 felt like I would get a really sharp, you know, answer that
4 was on target.

5 DR. TUCKER: Yeah. Nice. I agree with that.

6 Yeah, Franklin.

7 BD. MEM. QUARCOO: When it comes to Logan, a very
8 humble person. She usually knows way more than she's
9 setting out, but she will listen. And then, you know, it's,
10 oh, she may tell you, I don't know much about this, but you
11 listen to her, you think, what are you talking about? She's
12 very humble and very understanding. It's easy to work with
13 her. And very polite. You know, she treats people really
14 nicely, and I just enjoyed working with Logan. Thank you.

15 DR. TUCKER: Nice, nice, nice.

16 Kyla. And then Nate and then Allison.

17 BD. MEM. SMITH: Yeah. One of my first memories
18 of Logan was being on the Handling Subcommittee with her,
19 and we had a petition for something, I don't even remember
20 what it was. And she had her hand up, like, immediately,
21 like, you know, who wants the petition? And she had her
22 hand up, and it was in handling, so maybe not necessarily,
23 like, her total area of expertise. And I just thought that
24 was so indicative of her. Like, after I got to know her
25 more, of, like, really just wanting to, like, jump in to,

1 like, to learn. Like, she was like, well, I'm going to have
2 to do this eventually, I might as well just, like, rip the
3 Band-Aid off, jump in and get to it and, like, let's, you
4 know, get to work. Like, what -- like, let's not, you know,
5 dance around this. And so, anyway, I just really
6 appreciated her gung-ho, sort of, you know, always-willing-
7 to-do-the-work mentality.

8 DR. TUCKER: Yeah, all in. Yeah, thank you, Kyla.
9 Nate, you're next. And then Allison.

10 SECRETARY LEWIS: Yeah. I just -- echoing what
11 has already been said about Logan, and in particular growing
12 organic produce in a place where it is hard to do so. And
13 coming from a place in the Northwest where it's, I wouldn't
14 say it's easy, but it sounds easier than it does in Florida,
15 where she's at. And the thing that illustrated that to me,
16 she was describing how growing vegetables, and then in a
17 sandbox, essentially, and then the hurricane comes through
18 and doesn't wash the produce away or flood the produce; it
19 just literally blows all of the vegetables out of the
20 ground, and they're gone and in the woods or wherever they
21 are. They're just gone.

22 So, anyway, I just really appreciated that she
23 could, you know, put her boots back on the next day and go
24 back and plant that field again. So, anyway, yeah,
25 perseverance, industriousness, and just a really good

1 attitude, and that, for me, is a winning combination.

2 DR. TUCKER: Yes. Really, really nice. I
3 remember that story. Yeah. Yeah.

4 Allison.

5 NOSB VICE CHAIR JOHNSON: Thank you.

6 Yeah, just really echoing what was already been
7 said. The culmination of resilience is -- so many things
8 happened to Logan and her family during her time on the
9 board, and she rode through it all and still showed up
10 steady and with really insightful, grounded, practical
11 information every time. I'm just in awe of her
12 contributions to the board.

13 So thank you, Logan.

14 DR. TUCKER: So big round of applause for Logan,
15 in absentia.
16 (Zoom applause.)

17 DR. TUCKER: Logan, for the transcript purposes,
18 we were all applauding you and lots of claps and hearts
19 coming up.

20 Thank you for the added comments about Logan.

21 Again, to close, thank you, all five of you, for
22 all your service over the past five years. It has truly,
23 truly been an honor. Thank you for being such good humans.
24 And you leave behind good humans. That you have left a
25 legacy here that will extend far into the future. I often

1 talk about ripples in the pond; you don't always know where
2 your ripples are going to go, but you have all just made a
3 huge impact in this community, on the NOP team, and on your
4 fellow board members.

5 So, one final applause for all of our departing
6 folks and everyone on the board.

7 (Zoom applause.)

8 DR. TUCKER: And then I think I turn it back over
9 to Amy from here. So, Amy, thank you for letting me
10 facilitate that discussion.

11 NOSB CHAIR BRUCH: Thank you, Dr. Tucker. Thank
12 you, everybody. Okay, well, that was beautiful. Appreciate
13 the memorial.

14 We are going to keep going on our items of
15 business. And what we have right now is Other Business,
16 actually. So this is a point in time where we can bring up
17 something that's on the top of your mind that maybe wasn't
18 on the Work Agenda. Or a question.

19 So I see Carolyn's hand. Thank you, Carolyn.

20 BD. MEM. DIMITRI: Thank you so much, Amy.

21 Jenny, could you give us a little update on the
22 status of the geocoded locations of farms on certificates?
23 It feels terrible to ask that hard question after you said
24 all these beautiful things about us, but I'm, kind of,
25 curious.

1 DR. TUCKER: You know, I appreciate the question.
2 And Carolyn, I've got to say, I felt equally odd yesterday;
3 we were celebrating the lives of people who contributed
4 while I'm talking about import fraud. So I do think as a
5 community we are reasonably good at switching.

6 So for folks who aren't really aware of what we're
7 talking about, one of the NOP team members, they are so
8 good, sent the recommendation to me that we're actually
9 talking about. So I just pasted that in for folks who are
10 not all over this in terms of regular thinking. It advised
11 that NOP advise all. -- it recommended that all certifiers
12 record consistent location information. So geocodes was
13 part of that, so that's become, kind of, the shorthand for
14 this recommendation. But looking at legal parcels. And the
15 point was, where are the fields? So we know where they are
16 for oversight purposes, but also for data purposes. So I'm
17 going to try not to get too, too long and too wonky here,
18 but I am going to preview this as an enormously complicated
19 and difficult topic.

20 One of the -- so we have both technology and
21 policy issues here, and it's not just about NOP policy. One
22 of the things that we need to do to maintain the Organic
23 Integrity Database as a public repository of information is
24 we have to do something called a Privacy Act assessment,
25 which determines whether personally identifiable information

1 is being provided to the public.

2 It turns out, you know, we have a very unique
3 public-private partnership, and a lot of organic farms,
4 particularly small organic farms, happen to be located at
5 the same location as people's homes. And so when you
6 publish their addresses, that is publishing, could be
7 considered publication of PII -- personally identifiable
8 information.

9 Now, the reason we're able to maintain the Organic
10 Integrity Database as a public resource that anyone can use
11 is, number one, those farms are also certified entities, so
12 they are businesses. And so we think of them as businesses,
13 and so if you are an organic farm, for the purposes of the
14 Organic Integrity Database, it's a business. However --
15 however, we have needed to make location optional. So the
16 location address, so the rules in the database are that
17 certifiers provide either a mailing address or a physical
18 location, or they can provide both, but we have to be able
19 to provide an opt-out on location.

20 Now, luckily, most certifiers do provide that
21 information. Most certifiers do provide location
22 information. This has ramifications that are very, very
23 broad, including the reporting of acreage. So if you go,
24 for example, to the national level on an acreage report and
25 you look up USA -- so United States, and you look at acreage

1 information, it shows that only about 73 percent of
2 certified operations have acreage associated with the
3 operation. I said, that can't be right, because under SOE,
4 everyone has to report on acreage, so a year later, that
5 shouldn't be happening. And what I believe is happening, I
6 think, is how we're still troubleshooting this, but one of
7 the things I think is happening is we have about, you know,
8 somewhere around, you know, 20 percent, maybe a little
9 higher, 28 percent, maybe, of operations that actually don't
10 have a location address associated with it, so it's not
11 picking up that data for our acreage reports.

12 So this is something -- so if you're a certifier
13 listening, this is a preview of what we're going to talk
14 about next week. This is an emerging, kind of, awareness of
15 problems with wiring. So we have that policy problem of
16 personally identifiable information.

17 We also have the problem of this would require
18 rulemaking. That this is a fundamental change in how we
19 approach data, if we required geocoding. And that is going
20 to impact a whole lot of things, including what's called the
21 Paperwork Reduction Act, which makes us estimate the amount
22 of hours it would take for certifiers to implement certain
23 things. This would be an expensive rule, so requiring
24 certifiers to report at a parcel level would be expensive.
25 That's a lot of data work, which takes a bunch of time. And

1 in fact, one of the more expensive parts of SOE had to do
2 with recordkeeping and reporting data into the Organic
3 Integrity Database. So, those -- (A) it takes rulemaking.
4 (B), we got to look at Privacy Act considerations. So we
5 agree with the problem and the need.

6 I think the first step is talking to certifiers
7 about, here's the problem we've got right now of not having
8 accurate location. So could folks please report at least
9 the state that the location is in accurately?

10 We also have some certifiers that are listing a
11 single operation certification. I might have a field in
12 West Virginia, and I might have a field in Virginia, so
13 right across the state boundary; they might be on the same
14 certificate. One address means that acreage is being --
15 some of that acreage is being counted in the wrong state.
16 So when we talk about data quality and reporting issues,
17 these are some of the problems. So I think we have some
18 real upfront work to do with certifiers before we can even
19 think about rulemaking on geocoding. So I think the
20 geocoding recommendation related to data quality has really
21 helped inform this problem and helped us, kind of, start
22 peeling back.

23 We also have the challenge of it's going to cost
24 money to update the Organic Integrity Database, and right
25 now our top priority is having maximum functionality of both

1 system uptime and import certificates. That has to be the
2 priority for development. And so I think part of why we had
3 tabled this is it would require some programming changes
4 with the database, which would cost money and take time.
5 And we've just got other places we've got to be in keeping
6 the database up and running.

7 So probably more data than some folks wanted here.
8 But I did want to just highlight these are the complexities
9 that we tend to deal with every day, looking across
10 certifiers in a federal system where we have a whole other
11 universe of rules that we have to follow and stay attentive
12 to in a federal system.

13 So we'll keep the conversation going. Data
14 quality is super important. If you see poor data in the
15 Organic Integrity Database, talk to the certifier about it.
16 Call them, tell them what you're trying to do, and tell them
17 why you're having problems because of their data problems.
18 If they know people are looking at the data and care, that
19 might help in solving some of these problems. It's got to
20 be community driven, as well as NOP driven.

21 BD. MEM. DIMITRI: Thank you, Jenny.

22 NOSB CHAIR BRUCH: Thank you, Carolyn, for that
23 question. I was really curious, too. That was a real
24 strong initiative, I believe, 2023 recommendation from the
25 Board. Thank you.

1 Thanks, Jenny, for that extended response.

2 Nothing seems to meet the eye in terms of the ease, so I
3 appreciate the extension of the information there.

4 Nate, go ahead. I see your hand.

5 SECRETARY LEWIS: Yeah. Just briefly wanted to
6 acknowledge a public comment we received in the, kind of,
7 the second round of fall meeting comments when they
8 announced that we were meeting virtually here. And it was
9 in support of a certification standard for wild seafood,
10 wild-caught seafood, which is my personal -- I got a bee in
11 my bonnet about this, and would love to see the Board do
12 some work on that in the next couple of years while I'm
13 still on. So, anyway, just putting it out there that we did
14 receive a comment there. I want to acknowledge that, and
15 excited and ready to jump on that topic should it rise to
16 the top for the rest of the Board.

17 DR. TUCKER: Yes, Nate, thank you. That is not
18 something on the Work Agenda now. The most recent thing
19 with wild-caught fish is a few years ago we did a listening
20 session for Congress. So Congress asked us to do some
21 community listening and report back to them on the topic of
22 wild-caught seafood, so -- wild-caught fish. So right now
23 that topic is actually with Congress. We gave them our
24 report on the outcome of that listening session. And so if
25 this is a topic you're interested in right now, that's, kind

1 of, who owns this -- that topic. We would not start without
2 talking to Congress.

3 NOSB CHAIR BRUCH: Any other thoughts or questions
4 in this general business exchange?
5 (No response.)

6 NOSB CHAIR BRUCH: Not seeing any.

7 I prepared a few closing remarks, and then I'll
8 turn it back over to Jenny. But I really appreciate our
9 fast and furious time together. We packed a lot in in the
10 last couple days. Again, extremely grateful for the
11 opportunity to convene.

12 For me, this is the close of my time serving on
13 the Board, and I want to begin where all the meaningful work
14 should begin, and that's with gratitude. I know I did
15 recognize some of my fellow board members, the outgoing
16 class, in a prior segment, but I just again want to thank
17 all of you, all my board members. It's been a pleasure
18 serving with you. It has been an extreme honor.

19 To the classes who came before us and taught us so
20 well, I know there were some call-outs in our last exchange
21 as well, and I echo those. We've been just blessed with
22 mentors both in the board and outside the board. To my
23 colleagues and friends with whom I've had the pleasure of
24 serving, I truly can't believe how quickly these five years
25 have gone. Feels like we just got started, but 10 meetings

1 later, here we are. We've lived so much together as a
2 board. The debates, the long days, the long nights, the
3 moments of disagreement and alignment. That just sticks
4 with me. These are the things that shape you, and I will
5 carry them with me always.

6 Serving on the National Organic Standards Board
7 has been one of the most meaningful experiences in my
8 professional life, not because it was easy, but because it
9 mattered. We were asked to wrestle with real complexity.
10 We were asked to make decisions knowing that behind every
11 word on a page there's a farmer, a handler, a certifier, a
12 consumer, and a piece of land depending on us to get it
13 right.

14 Yesterday, while listening to Dr. Tucker,
15 something really struck me; the way we are framing the
16 challenges facing the organic community today has seemed to
17 evolve significantly from even five years ago, and in the
18 best possible ways. As Dr. Tucker noted, our sector has
19 reached a moment where we must be responsible for our own
20 success. That means we need policies that assist with
21 enforcement to uphold integrity for certificate holders.
22 But more than any single policy, rule, or program, we need
23 each other. We need to lean on one another when the times
24 are hard, because farming and stewardship and public service
25 are not solo endeavors. And we need to organize together to

1 ensure that our voices, ideas, and challenges are heard
2 clearly and constructively.

3 One of the things I love most about organic is
4 that it always has been understood, this truth; that
5 community is not a nice-to-have, it is a foundation.
6 There's still so much work ahead of us. That's not a sign
7 of failure, that's actually a sign of a living, growing
8 program. And I truly believe in this board, past, present,
9 and future, that it's honored the hope placed in it by the
10 organic community. Each of you has worked diligently to
11 identify positive change, to protect integrity, and to
12 ensure that organic remains credible, resilient, and worthy
13 of trust.

14 I want to say how deeply grateful I am to my
15 fellow board members, to the exec team, the new exec team as
16 well, the NOP staff and Michelle, and to Dr. Tucker for
17 steady leadership and partnership. This work has shaped me,
18 it has challenged me, and it has strengthened my belief in
19 what's possible when people show up with integrity,
20 curiosity, and courage.

21 I'll keep this goodbye brief, because in many
22 ways, it's not really goodbye at all. I'm just switching
23 from one side of the table to another, to the audience, and
24 I can't wait to see you all there, continuing this work
25 together. Best wishes. The work continues. Thank you.

1 And I'm going to turn it back over to Dr. Tucker.

2 DR. TUCKER: Let's all give a huge round of
3 applause to Amy for her success in being the Board Chair for
4 a very unusual year with the Board this year. A lot
5 happened, a lot of change, different kinds of board
6 meetings. So, big, big thank you to Amy for her leadership
7 over this time.

8 (Zoom applause.)

9 DR. TUCKER: I want to thank the entire Board
10 again for your focus, your professionalism, but also your
11 care for each other and for this community.

12 I want to thank the full NOP team. You guys don't
13 see, kind of, all the work that goes into this because it's
14 just so seamless, but there is a full team backstage right
15 now that has made this last couple of days successful. So I
16 do want to make sure I thank all of them. You know,
17 Michelle is really the front person who you guys deal with,
18 but there are an awful lot of folks who make all of this
19 happen in the program. So I think I will close with those
20 thanks.

21 I know a couple of times there's been a reference
22 to a May meeting. We are looking at a May meeting. We do
23 need to get the meeting notice through clearance before
24 we're going to announce details on that. But we are
25 planning for -- right now, we are planning on a May meeting.

1 So more details to come as we put that meeting notice.
2 Usually the first thing we do after the end of one meeting
3 is put in the meeting notice for the next one, and so we
4 will be doing that. We're a little late in announcing the
5 next meeting simply because this meeting got pushed. So
6 that's why. But look for more information coming from the
7 Program on that.

8 Again, I want to thank the Board, thank the
9 Program staff.

10 I notice we still have more than 100 people
11 online, which is pretty impressive. So to the 109 who stuck
12 it through, thank you for being here. Appreciate that. And
13 with that, I am going to officially adjourn the rescheduled
14 2025 National Organic Standards Board Meeting. Take good
15 care of yourselves, and we look forward to seeing you soon.
16 Take good care. Be well.

17 (Whereupon, at 4:55 p.m., the meeting concluded.)
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CERTIFICATION

This is to certify that the attached proceeding before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2025 NOSB BOARD MEETING -

RESCHEDULED - Day 2

PLACE: Zoom for Government

DATE: January 14, 2026

was held according to the record, and that this is the original, complete, true and accurate transcript which has been compared to the  lished at the hearing.

Elaine M. LaRosee, CDLR

Official Reporter

NATIONAL ORGANIC STANDARDS BOARD (NOSB)
FALL 2025 BOARD MEETING - DAY 2

- Vol. 2
 January 14, 2026

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