

**National Organic Standards Board
Policy Development Subcommittee
Sunset Review Efficiency Discussion Document
Fall 2025**

Summary:

At the Spring 2024, PDS brought forth a [discussion document](#) and began to implement a process for a more efficient voting procedure for sunset substances. In this approach, the Policy Development Subcommittee (PDS) proposed a group vote specifically for substances (1) that have widespread support for relisting and (2) where there is no new information suggesting that the products do not comply with National List criteria. At the Spring 2024 meeting, Board members indicated whether or not a particular substance would be eligible for a group vote.

Public comments related to this new procedure were mixed. Some stakeholders were supportive of reducing the time it took to vote on each substance and expressed a willingness to trial a new process that could reduce the time spent at meetings voting on each substance. Other stakeholders cautioned that any system that grouped substances into a single vote would reduce the transparency that is a hallmark of the National List review and approval process. Board members and public commenters also raised a number of procedural questions related to the mechanics of identifying which substances would be eligible for group voting and conditions that would result in a substance previously flagged for a group vote to be removed and voted on individually.

The PDS discussed the pros and cons of this sunset review efficiency process and decided that the potential time savings was not worth the potential confusion among Board members related to the voting procedure, and the potential for reduced transparency of the voting process among stakeholders. Instead, the PDS encourages Board members to present substances up for sunset review efficiently, focusing mostly on new information. NOSB will continue to vote individually on each substance up for sunset review.

Subcommittee Vote:

Motion to accept the discussion document on sunset review efficiency.

Motion by: Nate Lewis

Second by: Allison Johnson

Yes: 4 No: 0 Abstain: 0 Recuse: 0 Absent: 0