

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official NOP policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Policy Development Subcommittee Meeting Notes
Tuesday, January 10, 2017 2:00 pm ET**

Attendees: Dan Seitz (DS), Chair; Lisa de Lima (LD), Vice Chair; Jean Richardson (JR); Tom Chapman (TC); Jesse Buie (JB)

Absent: Tracy Favre (TF); Ashley Swaffar (AS)

Staff: Michelle Arsenault (MA); Jessica Walden (JW)

Work agenda

Project	Contact	Status	Vote	Target Meeting
Review of Policy & Procedure Manual (PPM)	DS	Revisions/Updates as needed		Ongoing
Update to member guide	MA/TC	Update as needed	NA	NA

Agenda

- Approve notes of December 13, 2016
- PPM updates
 - Conflicts of interest (COI) guidance - Representative vs SGE: question whether *government* compensation needs to be specified
 - Ancillary Substances review process
 - Recognizing members of the public during NOSB meetings for limited purposes
 - Discuss whether we should attempt to further group like substances for purposes of the sunset review
 - Misc. issues
- Adjourn

Discussion

- **Notes of December 13, 2016** were approved with a correction to the language in the first bullet about affiliations.
- **PPM updates**
 - COI guidance - Representative vs Special Government Employees (SGE). The group discussed a possible update to the NOSB memo on conflicts of interest to clarify the information about employer compensation. The policy pertains to SGEs, and not representatives, which NOSB members are classified as. TC will write a statement requesting the need for this change and forward it to the PDS Chair and the NOP.
 - Ancillary Substances review process. The NOP asked the NOSB to develop a review process for ancillary substances, and as such the NOSB has an informal process in place, but it has not been added to the PPM. LD will write the language and the PDS will add a brief paragraph to the PPM indicating how the review process will proceed.
 - Recognizing members of the public during NOSB meetings for limited purposes. Members discussed the option to call on members of the audience at the in-person meetings when factual

or historical information was needed. The group decided that it happens so rarely that it does not need to be codified in the PPM. Instead they will follow current procedures.

- Sunset materials groupings. The PDS discussed whether or not to regroup some of the similar materials on the sunset list to facilitate efficient review. The consensus was that since the NOSB has not yet completed one full cycle of reviews, the schedule would remain as is, until a later date, at which time they will reassess.
- Misc. issues. The PDS cancelled the Feb 14 call.
- **The meeting was adjourned**

[Previous PDS Notes](#)

Future Call Schedule (2nd Tuesday 2:00 ET)

December 13, 2016

January 10, 2017

COI guidance - Representative vs SGE.

Ancillary Substances review process.

February 14, 2017- cancelled

March 14, 2017

April 11, 2017

May 9, 2017

June 13, 2017

July 11, 2017

August 8, 2017

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Spring 2017 Milestones	2017 Target date
New NOSB member orientation	Feb 8, 2017
NOP - Complete Spring 2017 NOSB meeting tentative agenda	Feb 10, 2017
NOSB - Spring 2017 proposals due to NOP	Feb 17, 2017
NOP - Post proposals, Publish FRN, Open public comment	Mar 1, 2017
Discuss work agendas on ES call	Mar 10, 2017
Public comment closes	Mar 30, 2017
NOP - Send compiled public comments to NOSB	Apr 5, 2017
Work agendas finalized on ES call (last call before fall meeting)	Apr 7, 2017

Public comment webinar	Apr 13, 2017
Spring 2017 NOSB meeting – Denver, CO	Apr 19-21, 2017 (W-F)

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**National Organic Standards Board (NOSB)
Policy Development Subcommittee Meeting Notes
Tuesday, June 13, 2017 1:00 pm ET**

Attendees: Dan Seitz (DS), Chair; Lisa de Lima (LD), Vice Chair; Jesse Buie (JB); Tom Chapman (TC); Ashley Swaffar (AS)

Absent: none

Staff: Michelle Arsenault (MA)

Work agenda

Project	Contact	Status	Vote	Target Meeting
Review of Policy & Procedure Manual (PPM)	DS	Revisions/Updates as needed		Ongoing
Update to member guide	MA/TC	Update as needed	NA	NA

Agenda

- Approve notes of January 10, 2016
- Update on previously raised issues
 - Ancillary substances
 - Conflict of Interest
 - NOSB in-person comment process.
- Adjourn

Discussion

- **Notes of January 10, 2017** approved with no changes.
- **Update on previously raised issues**
 - **Ancillary substances.** The PDS discussed the addition of the ancillary review procedures to the Policy and Procedures Manual. The Handling Chair summarized the history of this project, which was initiated by the NOP in ~2015. The NOSB made a recommendation in 2016 for reviewing ancillary substances, and has asked for further guidance from NOP. The Handling Subcommittee is currently reviewing ancillary substances in cellulose and is having some difficulties, based on the current guidance. The lead noted that all ancillaries are allowed as long as they are included in the chart that the NOSB put forth, but the chart isn't comprehensive, and there are questions regarding "functional classes". The PDS chose to place the project on hold until it can discuss it further with the NOP.
 - **Conflict of Interest (COI).** The group discussed language that appears in the NOP COI memo regarding employer compensation while serving on an advisory board. This language applies only to Special Government Employees, and not Representatives, which is what NOSB members are classified as. The PDS discussed several options for clarifying this, including adding language to the PPM, but instead chose to leave it as is.
 - **NOSB in-person comment process.** The group discussed the comment process and possible ways in which the NOSB could improve efficiency. The members agreed that while there may be ways to improve the efficiency of the process, the current process also has benefits and any changes in the process might have unintended adverse consequences; for that reason,

the group did not recommend any changes at this time. The NOSB members will be asked to consider their comment experience at the upcoming fall meeting, and provide feedback.

- The PDS would like to meet with NOP to further discuss the ancillary substance review process and how to move forward. MA will schedule a meeting.
- **The meeting was adjourned**

[Previous PDS Notes](#)

Future Call Schedule (2nd Tuesday 2:00 ET)

February 14, 2017- cancelled

March 14, 2017 - cancelled

April 11, 2017 - cancelled

May 9, 2017 - cancelled

June 13, 2017

July 11, 2017

August 8, 2017

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~ Apr 27, 2017 , May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 18, 2017
NOP - Complete Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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**National Organic Standards Board (NOSB)
Policy Development Subcommittee Meeting Notes
Tuesday, July 11, 2017 1:00 pm ET**

Attendees: Dan Seitz (DS), Chair; Lisa de Lima (LD), Vice Chair; Jesse Buie (JB); Tom Chapman (TC); Ashley Swaffar (AS)

Absent: none

Staff: Michelle Arsenault (MA); Miles McEvoy (MM); Lisa Brines (LB)

Work agenda

Project	Contact	Status	Vote	Target Meeting
Review of Policy & Procedure Manual (PPM)	DS	Revisions/Updates as needed		Ongoing
Update to member guide	MA/TC	Update as needed	NA	NA

Agenda

- Approve notes of June 13, 2017
- Adjourn

Discussion

- **Notes of June 13, 2017** approved with no changes.
- **Ancillary substance review.** It was suggested that the PDS add a section to the PPM regarding the process for reviewing ancillary substances that reflects an April 2016 NOSB recommendation. The NOP has not yet implemented this recommendation. The group discussed the review process set forth in the NOSB recommendation, and several members noted difficulties with identification of functional classes and lack of clarity about how this would be interpreted or implemented by certifiers. Currently, the Handling Subcommittee is reviewing ancillary substances in cellulose and is seeking guidance from the NOP about how to move forward. There was general agreement that further action is needed by the NOP to better define/clarify the ancillary review process before the process can be outlined in the PPM; however, in the meantime the NOSB can gather information on ancillary substances that may be useful in developing a workable review process. Among other things, the NOSB will continue to ask for public feedback during sunset reviews and reviews of petitioned materials, and will maintain a list of ancillary substances, but will not proceed with any reviews or recommendations for ancillary substances until the program provides more guidance. The PDS will consider adding a sentence to the PPM about how the NOSB is currently handling ancillary substance review.
- **Other PPM updates.** The PDS will discuss some other minor changes to the PPM, including adding a task to the NOSB Secretary duties to monitor incoming public comment, prior to the comment deadline.
- **The meeting was adjourned**

[Previous PDS Notes](#)

Future Call Schedule (2nd Tuesday 2:00 ET)

June 13, 2017

July 11, 2017

August 8, 2017

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 19, 2017
NOSB public teleconference	August 14, 2017
NOP - Draft Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017