

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. Proposals must be voted on by the NOSB, to become recommendations to the USDA. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Policy Development Subcommittee (PDS) Notes Tuesday, March 11, 2025 3:00 pm ET

Present: Nate Lewis (NL), Chair; Carolyn Dimitri (CD), Vice Chair; Allison Johnson (AJ); Amy Bruch (ADB)

Absent: None

Staff: Michelle Arsenault (MA)

Agenda

- Review February 11, 2025 notes
- PPM updates (All)
 - Annotation Change procedure (ADB)
 - TR/TAP procedures (CD)
 - Sharepoint Governance & AI policy (NL)
- Collecting stakeholder input on new administration's priorities
- Additional Items
- Adjourn

Discussion

- **February 11, 2025 notes** were accepted as written.
- **Resource needs for PPM updates.** The group discussed several potential topics for PPM updates, and scheduled discussion dates with the goal of having a proposal for the Fall 2025 meeting.
 - Annotation Change procedure (ADB). Scheduled for April 8.
 - TR/TAP procedures (CD). The goal of the update is to clarify the standard process for determining the need for a TR, or not, and to make sure the process is transparent.
 - Sharepoint Governance & AI policy (NL). The Sharepoint guidance is straightforward, and the PDS discussed how they will actually use the resource. As for the use of AI, a member suggested some useful language provided to students: The use of AI is discouraged, but IF one chooses to use it, one must cite what and how it was used. She added that given the known detrimental environmental effects of data centers, AI seems incompatible with Organic.
- **Collecting stakeholder input on Administration's priorities.** The PDS feels it would be more constructive to stay the course with regard to its work, stay in listening mode, and focus on what is mandated in OFPA. A member added that there are other channels that stakeholders can use if they wish to provide general feedback to the USDA. A member reiterated that it would be better to wait, and not get ahead of themselves, and that there is plenty of work in the meantime.
- **Additional Items.** None.
- **The meeting was adjourned**

[Previous PDS Notes](#)

Future call schedule (2nd Tuesday 3:00 PM ET | 12:00 PM PT, except where noted)

February 11, 2025

March 11, 2025

April 8, 2025

Annotation Change procedure (ADB) - discuss

TR/TAP procedures (CD) - discuss

May 13, 2025

June 10, 2025

July 8, 2025

PPM updates (All) - discuss/vote

August 12, 2025

September 9, 2025

October 14, 2025

November 11, 2025

December 9, 2025

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled / status	Target Meeting
Policy & Procedure Manual (PPM) Update: Misc. updates 1. Sunset review efficiency (aka consent agenda)	NL/ADB	Discussion document	Revisions/Updates as needed	1.14.25 2.11.25	Spr 2025
Update to member guide 1. Misc updates (Add exit interviews, training graphic/handout)	MA/All	NA	Update as needed. Not posted on website	11.12.24 12.10.24 1.14.25	NA

Milestones

Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Jan 24, 2025	16 -20
NOP - Draft Spring 2025 NOSB meeting tentative agenda	Feb 7, 2025	~ 10
NOSB - Spring 2025 proposals due to NOP	Feb 13, 2025	~ 9
NOP - Post proposals	Mar 3, 2025	7.5
Public comment closes	Apr 2, 2025	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2025	3
Public comment webinars	Apr 22 & 24, 2025	1
Spring 2025 NOSB meeting - Tempe, AZ	Apr 29 - May 1, 2025	0
Final recommendations due	May 29, 2025	30 days post meeting

Fall 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 15, 2025	24

NOP - Draft Fall 2025 NOSB meeting agenda	Aug 8, 2025	~11
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Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~30 days post

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Policy Development Subcommittee (PDS) Notes **Tuesday, February 11, 2025 3:00 pm ET**

Present: Nate Lewis (NL), Chair; Carolyn Dimitri (CD), Vice Chair; Allison Johnson (AJ); Amy Bruch (AB)

Absent: None

Staff: Michelle Arsenault (MA)

Agenda

- Review January 14, 2025 notes
- PPM updates (All)
- Additional Items
- Adjourn

Discussion

- **January 14, 2025 notes** were approved as written.
- **PPM updates (All) - sunset review efficiency discussion document.** The group reviewed the draft document, which proposes a change to improve efficiency at the NOSB meetings. At the Fall 2024 meeting, the NOSB piloted a procedure to see if it was feasible, and while it created some efficiency, and saved some time, voting on each substance still took time. The process involved giving a brief summary of the sunset substance if the following criteria were met: a substance was non-controversial; and members were unanimous that it would be relisted.

This discussion document proposes a new iteration of the process, and includes a timeline to trial other iterations to see what works best. Members discussed a formalized list for “consent” voting, transparency, and mechanics and structure of the process. Members agreed that it would be better to test it at the spring meeting, after public comments, so it’s clearer which substances may end up on the consent agenda. To allow for maximum transparency, the PDS will submit a discussion document for the Spring NOSB meeting. The lead will modify the current draft to incorporate the topics discussed today, and the group will vote via email by the Thursday deadline. The PDS will discuss this more during its next call.

Motion to accept the updates to the PPM

Motion by: NL

Seconded by: CD

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

- **Additional Items.**
 - Potential topics for PPM updates. The group discussed a list of PPM updates and members volunteered to lead specific topics. The updates will be presented at the Fall 2025 NOSB meeting. The list includes:
 - Annotation changes, how to bring forth a parallel motion for those annotation changes (ADB).
 - Clarify TR procedures (i.e., internal via external) (CD)
 - Update PPM with AI, software, Sharepoint (NL/AJ).

Please let PDS Chair know what resources you may need to move forward.

- **The meeting was adjourned**

[Previous PDS Notes](#)

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- January 14, 2025
- February 11, 2025
- March 11, 2025
- April 8, 2025
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- July 8, 2025
- August 12, 2025
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Policy Development Subcommittee (PDS) Notes **Tuesday, January 14, 2025 3:00 pm ET**

Present: Nate Lewis (NL), Chair; Jerry D'Amore (JD); Allison Johnson (AJ); Amy Bruch (AB)

Absent: Carolyn Dimitri (CD), Vice Chair

Staff: Michelle Arsenault (MA)

Agenda

- Review December 10, 2024 notes
- Member guide finalization (AJ/NL)
- Additional Items
- Adjourn

Discussion

- **December 10, 2024 notes** were accepted with modifications made for brevity.
- **Member guide finalization (AJ/NL).** The PDS accepted the changes in the draft document and the lead will forward it to the NOP for distribution to the new NOSB members prior to training.
- **Additional Items.** The PDS reviewed the upcoming work agenda topics.
 - Potential PPM updates (annotation change process, TR procedures (internal and external), TAPs vs TRs, participation/accountability, Sharepoint governance, AI Policy, consent agenda, accessibility, participation, etc.). The Chair will check with CD about working on a document on participation of underserved groups.
 - Panels, Speakers. The NOSB Chair noted that when thinking about inviting panels and speakers, the Board consider what problem(s) it is trying to solve, then decide if a panel is the right vehicle for that.
 - The PDS Chair will add milestones and timelines for the PPM updates, with the intention of having a proposal at the Fall 2025 meeting.
 - Sunset review fast track. The Board piloted this process at the Fall 2025 meeting and will move forward with refinements to the implementation. The PDS may develop a proposal for the Fall 2025 meeting, that could be implemented in the Fall of 2026. The group will review the draft document at next call and may submit it for the spring NOSB meeting.
- **The meeting was adjourned**

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