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.

## Crops Subcommittee (CS) Notes Tuesday December 18, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Eric Schwartz (ES); Jesse

Buie (JB); Asa Bradman (AB); Sue Baird (SB); Dan Seitz (DS) - observer

**Absent:** Dave Mortensen (DM)

Staff: Michelle Arsenault (MA); Devon Pattillo (DP)

#### Agenda

- Potassium hypochlorite assign lead, confirm discussion date of Feb 5. Petition sufficiency and TR request is due Feb. 25
- Schedule AITC discussion and petition vote
- 2021 Sunsets: Oils, horticultural (Narrow range oils) (SE) discuss
- 2021 Sunsets: Ash from manure burning (HB)
- Strengthening Organic seed guidance (HB). Discuss comments from Fall 2018 meeting.
- Other items
- Adjourn

#### Discussion

- Notes. The CS Chair suggested additional language for the December 4 notes, and the notes were modified.
- **Potassium hypochlorite.** AB volunteered to lead the review of this material and will discuss it in February
- AITC. JB will lead the review. Discussion was scheduled for February 5.
- 2021 Sunsets: Oils, horticultural (Narrow range oils) (SE). The lead summarized the substance and the group discussed the persistence/breakdown. Horticultural oils are considered benign and are used during the dormant stage. The TR was not found sufficient and the Crops Subcommittee will ask some additional questions of the contractor.
- 2021 Sunsets: Ash from manure burning (HB). Deferred to next call.
- Strengthening Organic seed guidance (HB). Members discussed comments from the Fall 2018 meeting regarding sourcing seed, and planting stock. The 2018 proposal was reposted in the open docket for additional comment, and the CS will modify the proposal based on comments and bring it to the Spring meeting for discussion and vote. The group discussed such things as language in the NOP handbook guidance document (5029), which discusses planting stock, but does not address bare root versus potted stock. The lead will continue to draft the document and the CS will discuss it again on next call.
- Other items. None
- The meeting was adjourned

#### **Previous CS Notes**

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET, except where noted)

Calcium Acetate (SB) - TR sufficiency

Ammonium citrate and ammonium glycinate (EO/DM) - TR sufficiency

Paper pots (HB) - discuss need for TR

2021 Sunsets: Hydrogen peroxide (JB) - discuss

Liquid fish annotation (EO) - discuss draft disc doc

#### December 18, 2018

2021 Sunsets: Oils, horticultural (Narrow range oils) (SE) - discuss

2021 Sunsets: Ash from manure burning (HB)

Strengthening Organic seed guidance (HB). Discuss comments from Fall 2018 meeting.

Potassium hypochlorite - assign lead and confirm discussion date of Feb 5 for petition sufficiency

and TR request

Schedule AITC discussion

#### January 15, 2019

2021 Sunsets: Ash from manure burning (HB)

2021 Sunsets: Ferric phosphate (DM)

Strengthen and clarify the requirements for use of organic seed (NOP 5029)

Calcium Acetate (SE) - discuss draft proposal

#### January 29, 2019

Paper pots (HB) - discuss proposal

Ammonium citrate and ammonium glycinate (EO/DM) - discuss proposals

#### February 5, 2019

2021 Sunsets: Soaps, ammonium (RG)

2021 Sunsets: Sodium fluoaluminate (DS)

AITC (JB) - discussion and vote

#### February 19, 2019

Potassium hypochlorite (AB) - petition sufficiency and TR request

2021 Sunsets: Hydrogen chloride (AB)

March 5, 2019

March 19, 2019

April 2, 2019

April 16, 2019 - No call. Public comment webinar

May 7, 2019

May 21, 2019

June 4, 2019

June 18, 2019

July 2, 2019

July 16, 2019

August 6, 2019

August 20, 2019

September 3, 2019

September 17, 2019

October 1, 2019

October 15, 2019

November 5, 2019

November 19, 2019

December 3, 2019

December 17, 2019

| Petitioned Substances  |              |          |  |                                  |                   |
|--|--------------|----------|--|----------------------------------|-------------------|
| Substance  | Con-<br>tact | Doc type | Notes  | Discussed,<br><mark>Voted</mark> | Target<br>meeting |
| Allyl Isothiocyanate (AITC) Petition (2016) 205.601  Petition Addendum #1                  | JB           | Proposal | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18. Petition addendum sent to CS 07 25 18.  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF) | 11 20<br>02 05 19                | Spr 2019          |
| Ammonium Citrate 205.601 Petition Addendum #1 Petition Addendum #2 Petition Addendum #3    | DM/<br>EO    | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18. TR found sufficient 12 04 18.   | 12 04<br>01 29 19                | Spr 2019          |
| Ammonium Glycinate 205.601  Petition Addendum #1 Petition Addendum #2 Petition Addendum #3 | DM/<br>EO    | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18. TR found sufficient 12 04 18.   | 12 04<br>01 29 19                | Spr 2019          |
| <u>Calcium Acetate</u>   | SE           | Proposal | Petition sent to CS 01 20 17. Petition suff/TR request due 03 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in Sep 2018. TR sent to CS 10 10 18. Response due 12 09 18. TR found sufficient 12 04 18.   | 12 04<br>01 15 19                | Spr 2019          |
| Paper pots   | НВ           | Proposal | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18. Petition found sufficient 09 04 18.  2017 TR Newspaper  | 11 20<br>12 04<br>01 29 19       | Spr 2019          |

| Potassium<br>hypochlorite | Proposal | Petition sent to CS 12 10 18. Petition suff/TR request due 02 25 19. | 02 19 19 |  |
|---------------------------|----------|--|----------|--|
|                           |          |  |          |  |

| Other Topics  |              |                   |  |                     |                   |
|---|--------------|-------------------|--|---------------------|-------------------|
| Project   | Con-<br>tact | Doc type          | Notes*   | Discussed/<br>Voted | Target<br>meeting |
| Liquid fish annotation  | EO           | Discussion<br>doc | Approved by ES for addition to work agenda 05 18 18. Approved by NOP 09 13 18. TR requested 12 14 18.  | 12 04               | Spr 2019          |
| Biodegradable<br>Biobased mulch<br>annotation change                                | HB/<br>AB    | Proposal          | Limited scope TR request sent to NOP 08 02 16. TR sent to CS on 12 28 16. TR Suff due 02 27 17. CS found TR suff 01 03 17. On hold pending further research. NOP sent response to CS about adding this to work agenda. Waiting for details from NOP. | TBD                 | Spr 2019          |
| Strengthen and clarify<br>the requirements for<br>use of organic seed<br>(NOP 5029) | НВ           | Proposal          | Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at Fall 2017 meeting.   | 01 15 19            | TBD               |
| Research Priorities   | All          | NA                | RPs due to MS Aug 2018   | NA                  | Fall 2019         |

## 2021 Sunsets

TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes   | Scheduled,<br>Discussed | Target<br>meeting                            |
|--|---------------------------|--------------|-------------|---|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation   | 12 04                   | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | RG           | Y           | 1996 TAP Technical Evaluation Report (2015) 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early January 2019   | 02 05 19                | и  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Nov 30. TR was sent to HS 12 06 18. Sufficiency due 02 04 19. CS sent additional Q's to contractor. | 12 18                   | и  |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation   | 11 20                   | и  |
| Ferric phosphate                           | 205.601(h)                | DM           | N           | 2012 TR<br>2016 NOSB Recommendation   | 01 15 19                | и  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR<br>2017 NOSB Recommendation   | 11 20                   | и  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation   | 11 20                   | и  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation   | 02 19 19                | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation  | 01 15 19                | и  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | DS           | N           | None 2017 NOSB Recommendation   | 02 05 19                | и  |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| Spring 2019 Milestones                 | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment | Nov 26, 2018             |

| NOSB – Spring 2019 proposals due to NOP               | Feb 21, 2019      |
|---|-------------------|
| NOP - Draft Spring 2019 NOSB meeting tentative agenda | Mar 4, 2019       |
| NOP - Post proposals                                  | Mar 6, 2019       |
| Public comment closes                                 | Apr 4, 2019       |
| Discuss/finalize work agendas on ES call              | Apr 13, 2019      |
| NOP - Send compiled public comments to NOSB           | Apr 8, 2019       |
| Public comment webinars                               | Apr 16 & 18, 2019 |
| Spring 2019 NOSB meeting - Seattle, WA                | Apr 24 - 26, 2019 |

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.

## Crops Subcommittee (CS) Notes Tuesday December 4, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Eric Schwartz (ES); Dave

Mortensen (DM); Jesse Buie (JB); Asa Bradman (AB);

**Absent:** Sue Baird (SB)

Staff: Michelle Arsenault (MA); Clarissa Mathews (CM)

#### Agenda

Calcium Acetate (SB) - TR sufficiency

- Ammonium citrate and ammonium glycinate (EO/DM) TR sufficiency
- Paper pots (HB) discuss need for TR
- 2021 Sunsets: Hydrogen peroxide (JB) discuss
- Liquid fish annotation (EO) discuss draft disc doc
- Other items
- Adjourn

#### **Discussion**

- Calcium Acetate (SB). The Crops Subcommittee found the TR for calcium acetate sufficient.
- Ammonium citrate and ammonium glycinate (EO/DM). The lead reviewers determined that the TR
  addressed the additional questions and clarified the use of chelates and chelating agents, and the
  Subcommittee will proceed with its review. The Crops Subcommittee scheduled a discussion for the
  end of January.
- Paper pots (HB). The group discussed the need for a TR for paper pots (or paper products), or if the 2017 TR for newspaper is adequate. The NOP suggested other options: a TR on generalized paper products or adhesives, or a Limited Scope TR. Members noted that the impact of the use of these products seems insignificant, and will proceed with review without contracting a TR.
- **2021 Sunsets: Hydrogen peroxide (JB).** The lead summarized the substance's uses and previous sunset reviews. Hydrogen peroxide was initially approved for use by EPA in 1977. It is deemed compatible with a system of organic agriculture and has no human health impacts.
- Liquid fish annotation (EO). The lead sent the members the work agenda request for liquid fish products, which has background about why the NOSB would like to add it to the work agenda. The members discussed previous public comments and questions they would like answered. The group determined that the best path forward would be to request a TR with questions similar to the ones in the work agenda request submitted to the NOP on this topic. There was additional discussion about when pH should be tested in liquid fish materials. The Subcommittee will follow up with the Exec team on the next call to determine how the NOP would like the CS to respond to this question.
- Other items. None
- The meeting was adjourned

#### **Previous CS Notes**

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET, except where noted)

```
November 20, 2018
       2021 Sunsets - Discuss/vote
               Pheromones (SE)
               Potassium bicarbonate (EO)
               Magnesium sulfate (EO)
       AITC (JB) - Discuss proposal
       Calcium Acetate (SB) - TR sufficiency
       Ammonium citrate and ammonium glycinate (EO/DM) - TR sufficiency
December 4, 2018
       Calcium Acetate (SB) - TR sufficiency
       Ammonium citrate and ammonium glycinate (EO/DM) - TR sufficiency
       Paper pots (HB) - discuss need for TR
       2021 Sunsets: Hydrogen peroxide (JB) - discuss
       Liquid fish annotation (EO) - discuss draft disc doc
December 18, 2018
       2021 Sunsets: Oils, horticultural (Narrow range oils) (SE) - discuss
       2021 Sunsets: Ash from manure burning (HB)
       Strengthening Organic seed guidance (HB). Discuss comments from Fall 2018 meeting.
       Potassium hypochlorite - assign lead and confirm discussion date of Feb 5 for petition sufficiency
       and TR request
       Schedule AITC discussion
January 15, 2019
       2021 Sunsets: Ferric phosphate (DM)
       Strengthen and clarify the requirements for use of organic seed (NOP 5029)
       Calcium Acetate (SE) - discuss draft proposal
January 29, 2019
       Paper pots (HB) - discuss proposal
       Ammonium citrate and ammonium glycinate (EO/DM) - discuss proposals
February 5, 2019
       2021 Sunsets: Soaps, ammonium (RG)
       2021 Sunsets: Sodium fluoaluminate (DS)
       Potassium hypochlorite - petition sufficiency and TR request
February 19, 2019
       2021 Sunsets: Hydrogen chloride (AB)
March 5, 2019
March 19, 2019
April 2, 2019
April 16, 2019 - No call. Public comment webinar
May 7, 2019
May 21, 2019
June 4, 2019
June 18, 2019
July 2, 2019
July 16, 2019
August 6, 2019
August 20, 2019
September 3, 2019
September 17, 2019
October 1, 2019
October 15, 2019
November 5, 2019
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November 19, 2019

| Substance   | Con-<br>tact | Doc type | Notes  | Discussed,<br><mark>Voted</mark> | Target<br>meeting |
|---|--------------|----------|--|----------------------------------|-------------------|
| Allyl Isothiocyanate<br>ATC) Petition (2016)<br>05.601<br>etition Addendum #1                     | JB           | Proposal | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18. Petition addendum sent to CS 07 25 18.  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF) | 11 20                            | Spr 2019          |
| mmonium Citrate<br>05.601<br>Petition Addendum #1<br>Petition Addendum #2<br>Petition Addendum #3 | DM/<br>EO    | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18. TR found sufficient 12 04 18.   | 12 04<br>01 29                   | Spr 2019          |
| retition Addendum #1<br>Petition Addendum #2<br>Petition Addendum #3                              | DM/<br>EO    | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18. TR found sufficient 12 04 18.   | 12 04<br>01 29                   | Spr 2019          |
| alcium Acetate  | SE           | Proposal | Petition sent to CS 01 20 17. Petition suff/TR request due 03 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in Sep 2018. TR sent to CS 10 10 18. Response due 12 09 18. TR found sufficient 12 04 18.   | 12 04<br>01 15                   | Spr 2019          |

| Paper pots                | НВ | Proposal | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18. Petition found sufficient 09 04 18.  2017 TR Newspaper | 11 20<br>12 04<br>01 29 19 | Spr 2019 |
|---------------------------|----|----------|---|----------------------------|----------|
| Potassium<br>hypochlorite |    | Proposal | Petition sent to CS 12 10 18. Petition suff/TR request due 02 25 19.  | TBD                        |          |

| Project                | Con- | Doc type   | Notes*                                       | Discussed/   | Target    |
|------------------------|------|------------|--|--------------|-----------|
|                        | tact |            |  | <b>Voted</b> | meeting   |
| Liquid fish annotation | EO   | Discussion | Approved by ES for addition to work          | 12 04        | Spr 2019  |
|                        |      | doc        | agenda 05 18 18. Approved by NOP 09 13<br>18 |              |           |
| Biodegradable          | HB/  | Proposal   | Limited scope TR request sent to NOP 08      | TBD          | Spr 2019  |
| Biobased mulch         | AB   |            | 02 16. TR sent to CS on 12 28 16. TR Suff    |              |           |
| annotation change      |      |            | due 02 27 17. CS found TR suff 01 03 17.     |              |           |
|                        |      |            | On hold pending further research. NOP        |              |           |
|                        |      |            | sent response to CS about adding this to     |              |           |
|                        |      |            | work agenda. Waiting for details from        |              |           |
|                        |      |            | NOP.   |              |           |
| Strengthen and clarify | НВ   | Proposal   | Originated in MS. Referred back to CS at     | 01 15        | TBD       |
| the requirements for   |      |            | Spr 2017 meeting. Referred back to CS at     |              |           |
| use of organic seed    |      |            | Fall 2017 meeting.                           |              |           |
| (NOP 5029)             |      |            |  |              |           |
| Research Priorities    | All  | NA         | RPs due to MS Aug 2018                       | NA           | Fall 2019 |

# 2021 Sunsets TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes  | Scheduled,<br>Discussed | Target<br>meeting                            |
|--|---------------------------|--------------|-------------|--|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation  | 12 04                   | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | RG           | Y           | 1996 TAP Technical Evaluation Report (2015) 2017 NOSB Recommendation CS Requested TR 05 15 18. Due | 02 05                   | и  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Nov 30                             | 12 18                   | и  |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation  | 11 20                   | "  |
| Ferric phosphate                           | 205.601(h)                | DM           | N           | 2012 TR<br>2016 NOSB Recommendation  | 01 15                   | u  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR<br>2017 NOSB Recommendation  | 11 20                   | u  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation  | 11 20                   | и  |
| Hydrogen chloride                          | 205.601(n)                | АВ           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation  | 02 19                   | u  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation   | 12 18                   | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | DS           | N           | None 2017 NOSB Recommendation  | 02 05                   | u u  |

| Spring 2019 Milestones                                | Target dates (tentative) |
|---|--------------------------|
| NOP - Publish FRN, Open public comment                | Nov 26, 2018             |
| NOSB – Spring 2019 proposals due to NOP               | Feb 21, 2019             |
| NOP - Draft Spring 2019 NOSB meeting tentative agenda | Mar 4, 2019              |
| NOP - Post proposals                                  | Mar 6, 2019              |

| Public comment closes                       | Apr 4, 2019       |
|---|-------------------|
| Discuss/finalize work agendas on ES call    | Apr 13, 2019      |
| NOP - Send compiled public comments to NOSB | Apr 8, 2019       |
| Public comment webinars                     | Apr 16 & 18, 2019 |
| Spring 2019 NOSB meeting - Seattle, WA      | Apr 24 - 26, 2019 |

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.

## Crops Subcommittee (CS) Notes Tuesday November 20, 2018 2:00 pm ET

**Present:** Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Eric Schwartz (ES); Dave Mortensen (DM); Sue Baird (SB); Jesse Buie (JB); Asa Bradman (AB); Rick Greenwood - observer; Dan Seitz (DS) - observer

Absent: None

Staff: Michelle Arsenault (MA); Devon Pattillo (DP); Clarissa Mathews (CM)

#### Agenda

- Assign discussion dates to 2021 sunsets reviews
- 2021 Sunsets Discuss/vote
  - Pheromones (SE)
  - Potassium bicarbonate (EO)
  - Magnesium sulfate (EO)
- Allyl Isothiocyanate (AITC) (JB) Discuss proposal
- Calcium Acetate (SB) TR sufficiency
- Ammonium citrate and ammonium glycinate (EO/DM) TR sufficiency
- Paper pot petition
- Other items
- Adjourn

#### Discussion

- Assign discussion dates to 2021 sunsets reviews. See table and call schedule below.
- Two new NOSB members will be joining the Crops Subcommittee, and one will be rotating off, so the group reassigned the review of several substances.
- 2021 Sunsets Discuss/vote
  - o **Pheromones (SE).** The lead summarized the substance, and the group discussed potential questions for the Spring review.
  - Potassium bicarbonate (EO). The lead summarized the substance and the last review.
     Potassium bicarbonate is used for pest disease control on many crops. The supplemental TR included information about alternatives. The previous NOSB determined that this material was essential, and it was renewed.
  - Magnesium sulfate (EO). The lead summarized this substance, which is used as a soil
    amendment. The previous review included questions about availability and alternatives and
    the lead will include the same questions for this posting.
- Allyl Isothiocyanate (AITC) (JB). The proposal for AITC was returned to the Subcommittee for
  additional work at the Fall 2018 NOSB meeting. The petitioner provided feedback about the
  technical report in a petition addendum, and the Crops Subcommittee discussed this at length.
  Members also discussed use of AITC in nursery stock. The CS Chair will discuss this further with the
  lead reviewer and determine how to move forward. The Subcommittee also discussed adding this
  topic to the NOSB research priorities.
- Calcium Acetate (SB) TR sufficiency deferred to next call due to lack of time

- Ammonium citrate and ammonium glycinate (EO/DM). TR sufficiency deferred to next call due to lack of time
- Paper pot petition. The CS briefly discussed the need for a TR, and will discuss this further on a future call.
- Other items. A member offered advice to the new members about how to conduct and write a sunset review.
- The meeting was adjourned

#### **Previous CS Notes**

### Future Call Schedule (1st and 3rd Tuesdays 2:00 ET, except where noted)

November 6, 2018

Paper pots (HB) - Discuss questions for TR

Biodegradable Biobased Mulch annotation change

November 20, 2018

2021 Sunsets - Discuss/vote

Pheromones (SE)

Potassium bicarbonate (EO)

Magnesium sulfate (EO)

AITC (JB) - Discuss proposal

Calcium Acetate (SB) - TR sufficiency

Ammonium citrate and ammonium glycinate (EO/DM) - TR sufficiency

December 4, 2018

Calcium Acetate (SB) - TR sufficiency

Ammonium citrate and ammonium glycinate (EO/DM) - TR sufficiency

Paper pots - discuss need for TR

2021 Sunsets: Hydrogen peroxide (JB) - discuss

Liquid fish annotation (EO) – discuss draft disc doc

December 18, 2018

2021 Sunsets: Oils, horticultural (Narrow range oils) (SE) - discuss

2021 Sunsets: Ash from manure burning (HB)

Strengthening Organic seed guidance. Discuss comments from Fall 2018 meeting.

January 15, 2019

2021 Sunsets: Ferric phosphate (DM)

Strengthen and clarify the requirements for use of organic seed (NOP 5029)Calcium Acetate (SB) -

discuss draft proposal

January 29, 2019

Ammonium citrate and ammonium glycinate (EO/DM) - discuss proposals

February 5, 2019

2021 Sunsets: Soaps, ammonium (RG)

2021 Sunsets: Sodium fluoaluminate (DS)

February 19, 2019

2021 Sunsets: Hydrogen chloride (AB)

March 5, 2019

March 19, 2019

April 2, 2019

April 16, 2019 - No call. Public comment webinar

May 7, 2019

May 21, 2019

June 4, 2019

June 18, 2019
July 2, 2019
July 16, 2019
August 6, 2019
August 20, 2019
September 3, 2019
September 17, 2019
October 1, 2019
October 15, 2019
November 5, 2019
November 19, 2019
December 3, 2019
December 17, 2019

| Petitioned Substances   |              |          |  |                     |                   |
|---|--------------|----------|--|---------------------|-------------------|
| Substance   | Con-<br>tact | Doc type | Notes  | Discussed,<br>Voted | Target<br>meeting |
| Allyl Isothiocyanate (AITC) Petition (2016) 205.601  Petition Addendum #1               | JB           | Proposal | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18. Petition addendum sent to CS 07 25 18.  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF) | 11 20               | Spr 2019          |
| Ammonium Citrate 205.601 Petition Addendum #1 Petition Addendum #2 Petition Addendum #3 | DM/<br>EO    | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18.   | 12 04<br>01 29      | Spr 2019          |

| Ammonium Glycinate 205.601  Petition Addendum #1 Petition Addendum #2 Petition Addendum #3 | DM/<br>EO | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18. | 12 04<br>01 29 | Spr 2019 |
|--|-----------|----------|--|----------------|----------|
| Calcium Acetate  | SE        | Proposal | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in Sep 2018. TR sent to CS 10 10 18.  Response due 12 09 18  | 12 04<br>01 15 | Spr 2019 |
| Paper pots   | НВ        | Proposal | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18. Petition found sufficient 09 04 18.   | 11 20<br>12 04 | Spr 2019 |

| Other Topics  |              |                |   |                     |                   |
|---|--------------|----------------|---|---------------------|-------------------|
| Project   | Con-<br>tact | Doc type       | Notes*  | Discussed/<br>Voted | Target<br>meeting |
| Liquid fish annotation  | EO           | Discussion doc | Approved by ES for addition to work agenda 05 18 18. Approved by NOP 09 13 18   | 12 04               | Spr 2019          |
| Biodegradable<br>Biobased mulch<br>annotation change                                | HB/<br>AB    | Proposal       | Limited scope TR request sent to NOP 08 02 16. TR sent to CS on 12 28 16. TR Suff due 02 27 17. CS found TR suff 01 03 17. On hold pending further research. NOP sent response to CS about adding this to work agenda. Waiting for details from NOP |                     | Spr 2019          |
| Strengthen and clarify<br>the requirements for<br>use of organic seed<br>(NOP 5029) | НВ           | Proposal       | Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at Fall 2017 meeting.  | 01 15               | TBD               |
| Research Priorities   | All          | NA             | RPs due to MS Aug 2018  | NA                  | Fall 2019         |

# 2021 Sunsets TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes   | Scheduled,<br>Discussed | Target<br>meeting                            |
|--|---------------------------|--------------|-------------|---|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation                   | 12 04                   | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | RG           | Y           | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov | 02 05                   | и  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Nov 30    | 12 18                   | и  |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation                                       | 11 20                   | u  |
| Ferric phosphate                           | 205.601(h)                | DM           | N           | 2012 TR<br>2016 NOSB Recommendation                                       | 01 15                   | и  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR<br>2017 NOSB Recommendation                                       | 11 20                   | u  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation                                       | 11 20                   | и  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation                               | 02 19                   | u  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation                                  | 12 18                   | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | DS           | N           | None 2017 NOSB Recommendation   | 02 05                   | u  |

| Spring 2019 Milestones                                | Target dates (tentative) |
|---|--------------------------|
| NOP - Publish FRN, Open public comment                | Nov 26, 2018             |
| NOSB – Spring 2019 proposals due to NOP               | Feb 21, 2019             |
| NOP - Draft Spring 2019 NOSB meeting tentative agenda | Mar 4, 2019              |
| NOP - Post proposals                                  | Mar 6, 2019              |

| Public comment closes                       | Apr 4, 2019       |
|---|-------------------|
| Discuss/finalize work agendas on ES call    | Apr 13, 2019      |
| NOP - Send compiled public comments to NOSB | Apr 8, 2019       |
| Public comment webinars                     | Apr 16 & 18, 2019 |
| Spring 2019 NOSB meeting - Seattle, WA      | Apr 24 - 26, 2019 |

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.

## Crops Subcommittee (CS) Notes Tuesday November 6, 2018 2:00 pm ET

**Present:** Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Eric Schwartz (ES); Dave Mortensen (DM); Sue Baird (SB); Jesse Buie (JB); Asa Bradman (AB)

Absent:

**Staff:** Michelle Arsenault (MA); Devon Pattillo (DP)

#### Agenda

- Review final recommendations/cover sheet responsibilities (SE)
- Debrief from St. Paul (all)
- AITC petition
- Assign meeting dates and leads for 2021 sunsets and proposals for spring meeting. We already
  assigned leads but need to adjust them since Dave does not have any and we have since added Eric
  to the committee
- Biodegradable biobased mulch annotation change
- Paper pots (HB) discuss questions for TR
- Ammonium citrate/ammonium glycinate TR review (most likely will be rolled over to the next call, but something we need to be thinking about)
- Reschedule Jan. 1 (New Years Day) call to Jan. 22 or 29.
- Other items
- Adjourn

#### Discussion

- Review final recommendations/cover sheet responsibilities (SE). Members will complete their coversheets and add any additional justification or comments from the fall meeting.
- Debrief from St. Paul (all).
  - Organic seed guidance. Comments were varied, and the lead would like to review them in depth before moving forward.
  - o AITC petition. Sent back to Subcommittee for additional work
  - Members were encouraged and enthusiastic that the NOP decided to extend the use of paper pots while the Crops Subcommittee/NOSB undertakes its review on the petition. The NOSB was able to make the case that there is a grey area on the National List that warrants further review.
- Assign meeting dates and leads for 2021 sunsets and proposals for spring meeting. The CS made some assignments and deferred the remainder to the next call. Additionally, the Crops Subcommittee has a new member who does not currently have any assignments.
- **Biodegradable biobased mulch annotation change.** Members discussed the work agenda request. The NOP verbally approved the continued work on this topic, and the CS will wait for the detailed written request before moving forward with the review.
- Paper pots (HB). Members discussed how to move forward with the review for paper pots. The group discussed other similar listings such as newspaper, the adhesives used on paper pots, as well as the need and usefulness of a technical report (TR), noting that they already received a limited

scope TR. One member championed the idea of reviewing this as a production aid. Another member compared the disparity between the depth at which the NOSB is considering paper pots with that of hydroponic systems, emphasizing that paper pots are relatively innocuous. The CS will broaden the scope and consider the topic of paper for use in organic agriculture, and not just paper pots. The lead will resend the background information about adhesives and cardboard and will draft some language for a proposal without requesting a TR.

- Ammonium citrate/ammonium glycinate TR review. Deferred to next call due to time constraints.
- Other items. Crops will reschedule the January 1 call to January 29
- The meeting was adjourned

#### **Previous CS Notes**

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET, except where noted)

October 16, 2018 - cancelled for the public comment webinar

November 6, 2018

Paper pots (HB) - Discuss questions for TR

Biodegradable Biobased Mulch annotation change

November 20, 2018

2021 Sunsets - Discuss/vote

Pheromones (SE)

Potassium bicarbonate (EO)

Magnesium sulfate (EO)

AITC (JB) - Discuss proposal

Calcium Acetate (SB) - TR sufficiency

Ammonium citrate and ammonium glycinate (EO/DM) - TR sufficiency

December 4, 2018

2021 Sunsets (SE). Discuss/vote.

Oils, horticultural (Narrow range oils) (SE)

December 18, 2018

Strengthening Organic seed guidance. Discuss comments from fall 2018 meeting.

January 15, 2019

January 29, 2019

February 5, 2019

February 19, 2019

March 5, 2019

March 19, 2019

April 2, 2019

April 16, 2019 - No call. Public comment webinar

May 7, 2019

May 21, 2019

June 4, 2019

June 18, 2019

July 2, 2019

July 16, 2019

August 6, 2019

August 20, 2019

September 3, 2019

September 17, 2019

October 1, 2019

October 15, 2019

November 5, 2019 November 19, 2019 December 3, 2019 December 17, 2019

| Petitioned Substances  |              |          |  |                     |                   |
|--|--------------|----------|--|---------------------|-------------------|
| Substance  | Con-<br>tact | Doc type | Notes  | Discussed,<br>Voted | Target<br>meeting |
| Allyl Isothiocyanate<br>(AITC) Petition (2016)<br>205.601                                  | JB           | Proposal | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF) | 11 20               | Spr 2019          |
| Ammonium Citrate 205.601 Petition Addendum #1 Petition Addendum #2 Petition Addendum #3    | EO/<br>DM    | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18.   | 11 20               | Spr 2019          |
| Ammonium Glycinate 205.601  Petition Addendum #1 Petition Addendum #2 Petition Addendum #3 | EO/<br>DM    | Proposal | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR sent to CS 07 30 18. Response due 09 28 18. Crops sent additional questions to TR contractor. Revised TRs sent to CS 10 16 18. Response due 12 15 18.   | 11 20               | Spr 2019          |
| <u>Calcium Acetate</u>   | SB           | Proposal | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in Sep 2018. TR sent to CS 10 10 18.  Response due 12 09 18  | 11 20               | Spr 2019          |
| Paper pots   | НВ           | Proposal | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18. Petition found sufficient 09 04 18.   |                     | Spr 2019          |

| Other Topics           |      |            |  |              |           |
|------------------------|------|------------|--|--------------|-----------|
| Project                | Con- | Doc type   | Notes*                                       | Discussed/   | Target    |
|                        | tact |            |  | <b>Voted</b> | meeting   |
| Liquid fish annotation | EO   | Discussion | Approved by ES for addition to work          |              | Spr 2019  |
|                        |      | doc        | agenda 05 18 18. Approved by NOP 09 13<br>18 |              |           |
| Biodegradable          | HB/  | Proposal   | Limited scope TR request sent to NOP 08      |              | Spr 2019  |
| Biobased mulch         | AB   |            | 02 16. TR sent to CS on 12 28 16. TR Suff    |              |           |
| annotation change      |      |            | due 02 27 17. CS found TR suff 01 03 17.     |              |           |
|                        |      |            | On hold pending further research. NOP        |              |           |
|                        |      |            | sent response to CS about adding this to     |              |           |
|                        |      |            | work agenda.                                 |              |           |
| Strengthen and clarify | НВ   | Proposal   | Originated in MS. Referred back to CS at     | 12 18        | TBD       |
| the requirements for   |      |            | Spr 2017 meeting. Referred back to CS at     |              |           |
| use of organic seed    |      |            | Fall 2017 meeting.                           |              |           |
| (NOP 5029)             |      |            |  |              |           |
| Research Priorities    | All  | NA         | RPs due to MS Aug 2018                       | NA           | Fall 2019 |

# 2021 Sunsets TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes   | Scheduled,<br>Discussed | Target<br>meeting    |
|--|---------------------------|--------------|-------------|---|-------------------------|----------------------|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation                   |                         | Summary:<br>Spr 2019 |
|  |                           |              |             |   |                         | Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y           | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov |                         | и                    |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Nov 30    | 12 4 or<br>12 18        | и                    |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation                                       | 11 20                   | u                    |
| Ferric phosphate                           | 205.601(h)                | SB           | N           | 2012 TR<br>2016 NOSB Recommendation                                       |                         | и                    |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR<br>2017 NOSB Recommendation                                       | 11 20                   | u                    |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation                                       | 11 20                   | и                    |
| Hydrogen chloride                          | 205.601(n)                | AB           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation                               |                         | и                    |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation                                  |                         | и                    |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N           | None 2017 NOSB Recommendation   |                         | u .                  |

| Spring 2019 Milestones                                | Target dates (tentative) |
|---|--------------------------|
| NOP - Publish FRN, Open public comment                | Nov 2, 2018              |
| NOSB – Spring 2019 proposals due to NOP               | Feb 21, 2019             |
| NOP - Draft Spring 2019 NOSB meeting tentative agenda | Mar 4, 2019              |
| NOP - Post proposals                                  | Mar 6, 2019              |

| Public comment closes                       | Apr 4, 2019       |
|---|-------------------|
| Discuss/finalize work agendas on ES call    | Apr 13, 2019      |
| NOP - Send compiled public comments to NOSB | Apr 8, 2019       |
| Public comment webinars                     | Apr 16 & 18, 2019 |
| Spring 2019 NOSB meeting - Seattle, WA      | Apr 24 - 26, 2019 |

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

### **Crops Subcommittee (CS) Notes** Tuesday October 2, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Eric Schwartz (ES); Dave

Mortensen (DM); Sue Baird (SB)

Absent: Jesse Buie (JB); Asa Bradman (AB)

Staff: Jenny Tucker (JT); Paul Lewis (PL); Michelle Arsenault (MA); Clarissa Mathews (CM)

#### Agenda

- Paper pots (HB) Discuss questions for TR
- Review public comments
- Review Subcommittee lead assignments for fall meeting presentations (All)
- Other items
- Adjourn

#### Discussion

- Paper pots (HB). NOP joined the call to discuss the NOP's position on paper pots, and similar listings. The NOP has decided to not extend the allowance for the use of paper pots for another growing season while the NOSB completes its review of the pending petition. The question about the use of paper pots arose from a disagreement between certifiers: some were approving its use, and some were not. The NOP investigated the discrepancy, and determined that the approval for use was incorrect and should not be allowed. Members discussed the disparity between the allowance of newspaper and paper pots. Fatty alcohols is another example of a substance review that would set a precedent for allowance. Members offered perspectives from various segments of the organic community. The NOP will discuss this at the Fall 2018 meeting, so the public is aware of the NOP's decision. A member asked about the possibility of providing better communication with the public regarding the decision, since it involves small growers who do not necessarily participate or even know about the NOSB and the Board's process. The group discussed the process for review. The CS will discuss possible TR questions for paper pots on next call.
- **Review public comments.** Members discussed the presentation of substances at the meeting.
- Review Subcommittee lead assignments for fall meeting presentations (All). The CS Chair will send the list to the Subcommittee members so everyone is aware of who is presenting what.
- Other items. None
- The meeting was adjourned

#### **Previous CS Notes**

#### Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

September 18, 2018

AITC petition addendum - discussion MS proposals (HB) - discuss Paper pots (HB) - Discuss resolution

#### October 2, 2018

Paper pots (HB) - Discuss questions for TR Review public comments

Review Subcommittee lead assignments for fall meeting presentations (All)

October 16, 2018 - cancelled for the public comment webinar November 6, 2018  $\,$ 

Paper pots (HB) - Discuss questions for TR Biodegradable Biobased Mulch annotation change November 20, 2018

December 4, 2018 December 18, 2018

| Substance  | Con-<br>tact | Doc type                      | Notes   | Discussed,<br>Voted   | Target<br>meeting |
|--|--------------|-------------------------------|---|---|-------------------|
| Allyl Isothiocyanate AITC) Petition 2016) 05.601 | JB           | Proposal                      | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  AITC Petition (2013) (PDF)  NOSB Subcommittee Proposal (2014) (PDF)  Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jul 17<br>Sep 18                                   | Fall 2018         |
| Sodium Citrate<br>205.601                        | НВ           | Proposal                      | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015). TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17. Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018         |
| <u>Natamycin</u>                                 | НВ           | Proposal                      | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018         |
| Ammonium Citrate<br>205.601                      | EO/DM        | Petition<br>discussion<br>doc | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July   | Nov 21<br>Aug 7<br>Sep 4                                    | Fall 2018         |

| Petition Addendum #1 Petition Addendum #2 Petition Addendum #3                             |              |                               | 2018. TR sent to CS 07 30 18. Response due 09 28 18.   |                               |                   |
|--|--------------|-------------------------------|--|-------------------------------|-------------------|
| Ammonium Glycinate 205.601  Petition Addendum #1 Petition Addendum #2 Petition Addendum #3 | EO/DM        | Petition<br>discussion<br>doc | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.         | Nov 21 Aug 7 Sep 4            | Fall 2018         |
| Calcium Acetate  | SB           | Petition<br>discussion<br>doc | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in Sep 2018. | Feb 6<br><mark>Aug 21</mark>  | Fall 2018         |
| Paper pots   | НВ           | Petition<br>discussion<br>doc | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18. Petition found sufficient 09 04 18.   | Aug 21<br>Sep 4<br>Sep 18     | Fall 2018         |
| Other Topics   |              |                               |  |                               |                   |
| Project  | Con-<br>tact | Doc type                      | Notes*   | Discussed/<br>Voted           | Target<br>meeting |
| Liquid fish annotation   | EO           | Discussion doc                | Approved by ES for addition to work agenda 05 18 18. Approved by NOP 09 13 18  | Jun 6<br>Sep 21               | Spr 2019          |
| Biodegradable<br>Biobased Mulch<br>annotation change                                       | НВ/АВ        | Discussion doc                | Limited scope TR request sent to NOP 08 02 16. TR sent to CS on 12 28 16. TR Suff due 02 27 17. CS found TR suff 01 03 17. On hold pending further research.                 | Aug 1, 2017                   | TBD               |
| Strengthen and clarify the requirements for use of organic seed (NOP 5029)                 | НВ           | Proposal                      | Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at Fall 2017 meeting.   | Jul 17<br><mark>Aug 21</mark> | Fall 2018         |
| Research Priorities  * Vellow highlights   | All          | NA                            | RPs due to MS Aug 2018 tee action needed *Highlight indicates revie  | NA                            | Fall 2018         |

## 2020 Sunsets TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018

| Substance                  |                                 | Con<br>tact | TR<br>requ<br>est? | Notes                                      | Scheduled,<br>Discussed     | Target<br>meeting    |
|----------------------------|---------------------------------|-------------|--------------------|--|-----------------------------|----------------------|
| Alcohols:                  | 205.601(a)(1)(i),               | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014          | Feb 6                       | Summary:             |
| Ethanol                    | 205.601(a)(1)(ii)               |             |                    | TR - Isopropanol                           | Aug 7                       | Spr 2018             |
| Isopropanol                |                                 |             |                    |  |                             | Review:<br>Fall 2018 |
| Sodium                     | 205.601(a)                      | EO          | N                  | 2006 TAP; 2014 TR                          | Dec 5                       | # #                  |
| carbonate<br>peroxyhydrate |                                 |             |                    |  | Jul 3                       |                      |
| Newspaper or               | 205.601(b) and                  | НВ          | N                  | 2017 TR                                    | Dec 5                       | u                    |
| other recycled paper       | (c)                             |             |                    |  | Jun 19                      |                      |
| Plastic mulch and          | 205.601(b)                      | НВ          | N                  | 1995 TAP: TR for biodegradable             | Dec 19,                     | u                    |
| covers                     |                                 |             |                    | mulch. Low priority                        | Jan 2<br><mark>Aug 7</mark> |                      |
| Aqueous                    | 205.601(e),                     | DM          | N                  | <u>2014 TR</u>                             | Jan 2,                      | u                    |
| potassium<br>silicate      | 205.601(i)                      |             |                    |  | Feb 6  Aug 21               |                      |
| Elemental sulfur           | 205.601(e)(5),                  | AB          | Υ                  | 1995 TAP; 2017 TR for Livestock. TR        | Dec 19,                     | и                    |
|                            | 205.601(i)(10),                 |             |                    | requested 07 28 17. In contracting.        | Jan 2                       |                      |
|                            | 205.601(j)(2)                   |             |                    | TR sent to CS 01 10 18. TR                 | Feb 20                      |                      |
|                            |                                 |             |                    | sufficiency due 03 12 18. CS sent          | Aug 21                      |                      |
|                            |                                 |             |                    | additional questions to the TR             |                             |                      |
|                            |                                 |             |                    | contractor. TR final draft expected        |                             |                      |
|                            |                                 |             |                    | April 2018. TR addendum sent to CS 4 20 18 |                             |                      |
| Lime sulfur                | 205.601(e)(6),<br>205.601(i)(6) | SE          | N                  | 2014 TR                                    | Dec 19<br>Jun 5             | u                    |
| Sucrose octanoate esters   | 205.601(e)(10)                  | SB          | N                  | 2005 TR                                    | Dec 19<br>Jul 3             | u                    |
| Hydrated lime              | 205.601(i)(4)                   | DM          | N                  | 1995 TAP; 2001 TAP; 2002 TR for            | Jan 2,                      | u                    |
|                            |                                 |             |                    | <u>Calcium Hydroxide</u>                   | Aug 21                      |                      |
| Liquid fish products       | 205.601(j)                      | AB          | N                  | 1995 TAP; 2006 TR                          | Jan 16,<br>Aug 21           | u                    |
| Sulfurous Acid             | 205.601(j)                      | SE          | N                  | 2010 TAP; 2014 TR                          | Dec 19 Jun 5                | u                    |
| Ethylene                   | 205.601(k)                      | EO          | N                  | 2000 Supplemental TAP; 2007 TAP;           | Dec 19                      | и                    |
| •                          |                                 |             |                    | 2011 Supplemental TR                       | Jul 3                       |                      |

| Microcrystalline | 205.601(o) | SB | Υ | None. TR requested 07 28 17. In      | Dec 19, | u |
|------------------|------------|----|---|--------------------------------------|---------|---|
| cheesewax        |            |    |   | contracting. TR sent to CS 01 11 18. | Feb 20  |   |
|                  |            |    |   | TR found sufficient 02 20 18.        | Jul 3   |   |
| Potassium        | 205.602(e) | НВ | N | 1995 TAP. Low priority               | Jan 16  | u |
| chloride         |            |    |   |                                      | Aug 7   |   |
|                  |            |    |   |                                      |         |   |

#### 2021 Sunsets TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019 **National** Substance Con-TR re-Notes Scheduled, Target List § tact quest? **Discussed** meeting Hydrogen peroxide 205.601(a), JB 2015 Hydrogen Peroxide (Crops) Ν Summary: 205.601(i) 2017 NOSB Recommendation Spr 2019 Review: Fall 2019 Soaps, ammonium 205.601(d) SB Υ 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due **Early Nov** Oils, horticultural 205.601(e), SE Υ 1995 TAP (Narrow range oils) 205.601(i) 2017 NOSB Recommendation CS Requested TR 05 15 18. Due **Early Nov** 205.601(f) SE Ν 2012 TR Pheromones 2017 NOSB Recommendation 2012 TR Ferric phosphate 205.601(h) SB Ν 2016 NOSB Recommendation Potassium 205.601(i) EO 2015 TR bicarbonate 2017 NOSB Recommendation EO Magnesium sulfate 205.601(j) Ν 2011 TR 2017 NOSB Recommendation Hydrogen chloride 205.601(n) ΑB Ν 2014 Lmtd Scope TR 2016 NOSB Recommendation " Ash from manure 205.602(a) HB 2016 sunset rec burning 2017 NOSB Recommendation Sodium 205.602(f) HB Ν None fluoaluminate **2017 NOSB Recommendation**

Fall 2018 Milestones Target dates (tentative)

| NOP - Publish FRN, Open public comment             | Aug 9, 2018              |
|--|--------------------------|
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| New NOSB member training                           | July 18, 2018            |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |
| NOP - Send compiled public comments to NOSB        | Oct 8, 2018              |
| Public comment webinars                            | Oct 16 & 18, 2018        |
| Fall 2018 NOSB meeting - St. Paul, MN              | Oct 24-26, 2018          |

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

## Crops Subcommittee (CS) Notes Tuesday September 18, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Eric Schwartz (ES); Jesse

Buie (JB); Asa Bradman (AB); Dave Mortensen (DM)

Absent: Sue Baird (SB)

**Staff:** Michelle Arsenault (MA); Clarissa Mathews (CM)

#### **Agenda**

AITC petition addendum - discussion

- Paper pots (HB) petition discussion
- Review MS doc: Genetic Integrity Transparency of Seed Grown on Organic Land (HB).
- Review MS doc: Excluded Methods Determinations (HB).
- Other items
- Adjourn

#### Discussion

- AITC petition addendum. A petition addendum was submitted to the NOP after the Subcommittee
  voted on the proposal. The CS has considered the content of the addendum in light of their
  proposal and vote, and will acknowledge its receipt at the Fall NOSB meeting.
- Review MS doc: Excluded Methods Determinations (HB). The MS Chair summarized the proposal
  on excluded methods for the benefit of the Crops Subcommittee and members who may not be on
  the Materials Subcommittee.
- Review MS doc: Genetic Integrity Transparency of Seed Grown on Organic Land (HB). The MS Chair summarized the proposal on the genetic integrity of seed for the benefit of the Crops Subcommittee and members who may not be on the Materials Subcommittee. The proposal requests the testing of field corn as a pilot program for producers to track the contamination risk through sampling, testing, and documentation. In previous iterations of this topic, the Board explored the idea of setting tolerance levels, which was not feasible. The proposal doesn't include specific direction to NOP about how to collect data or what form this should take. i.e. instructions to certifiers or guidance. It is conducive to instruction because it would be added to an organic system plan, and therefore would not necessitate rulemaking. A member cautioned the Subcommittee members about two potential issues: It may uncover contamination issues that may be larger than anticipated and may result in the perception that the testing and sampling protocol is being applied unevenly. For example, he noted that split operations are less likely to buy organic seed, which may inadvertently be seen as a punishment to organic growers.
- Paper pots (HB). The Chair relayed some background information and feedback from NOP about the use of adhesives in paper pots, and whether they could or should be allowed on the National List of allowed and prohibited substances. The NOSB is awaiting some additional information about whether the same adhesives used in paper pots are also used in newspaper, which is allowed for organic use. Crops will discuss questions to include in the TR request on the October 2 call.
- Other items.
  - Liquid fish annotation. The request to add the work agenda item on the liquid fish annotation was approved by NOP Sept 13. Added below.
  - Sucrose octanoate esters. SOEs no longer have EPA registration which means they would no longer be allowed for use in organic. Members will discuss this as part of the sunset review at the Fall NOSB meeting.

#### The meeting was adjourned

### **Previous CS Notes**

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

September 4, 2018

AITC petition addendum - discussion

September 18, 2018

AITC petition addendum - discussion

MS proposals (HB) - discuss

Paper pots (HB) - Discuss resolution

October 2, 2018

Paper pots (HB) - Discuss questions for TR

Review public comments

Review Subcommittee lead assignments for fall meeting presentations (All)

October 16, 2018 - cancelled for the public comment webinar

November 6, 2018

November 20, 2018

December 4, 2018

December 18, 2018

| Petitioned Substance                                | es           |                  |  |   |           |
|---|--------------|------------------|--|---|-----------|
| Substance   | Con-<br>tact | TR<br>request?   | Notes  | Discussed,<br>Voted   | Meeting   |
| Allyl Isothiocyanate (AITC) Petition (2016) 205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF) | Mar 6<br>Jul 17<br>Sep 18                                   | Fall 2018 |
| Sodium Citrate<br>205.601                           | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015). TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.               | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018 |

|   |              |          | Response due 02 19 18. TR found sufficient 02 06 18.   |                                    |                                     |
|---|--------------|----------|--|------------------------------------|-------------------------------------|
| Natamycin   | НВ           | Y        | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.  | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19 | Fall 2018                           |
| Ammonium Citrate<br>205.601   | EO/DM        | Y        | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.   | Nov 21<br>Aug 7<br>Sep 4           | Petition<br>discussion<br>Fall 2018 |
| Ammonium<br>Glycinate<br>205.601  | EO/DM        | Y        | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.   | Nov 21<br>Aug 7<br>Sep 4           | Petition<br>discussion<br>Fall 2018 |
| <u>Calcium Acetate</u>  | SE SB?       | Y        | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in Sep 2018.   | Feb 6<br>Aug 21                    | Petition<br>discussion<br>Fall 2018 |
| Paper pots  | НВ           |          | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18. Petition found sufficient 09 04 18.   | Aug 21<br>Sep 4<br>Sep 18          | Petition<br>discussion<br>Fall 2018 |
| Other Topics  |              |          |  |                                    |                                     |
| Project   | Con-<br>tact | Doc type | Notes*   | Discussed/<br>Voted                | Meeting                             |
| Liquid fish annotation  | EO           | Disc doc | Approved by ES for addition to work agenda 05 18 18. Approved by NOP 09 13 18  | Jun 6<br>Sep 18                    | TBD                                 |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues | ЕО/НВ        | Disc Doc | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017          | TBD                                 |
| Biodegradable<br>Biobased Mulch<br>annotation change                                    | НВ/АВ        | Disc Doc | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017                        | TBD                                 |

| Prohibition of NPEs  | HB/EO/  | Disc     | IWG recommended NOSB work on NPEs/TR   | TBD                           | TBD       |
|--|---------|----------|--|-------------------------------|-----------|
| in inerts -  | DM/AB   | Doc/Prop | requested July 2014.   |                               |           |
| annotation change/   |         |          | DD - April 2016.   |                               |           |
| EPA List 4 Inerts  |         |          | EPA List 4 inerts disc doc (originated from  |                               |           |
| annotation change  |         |          | 2017 sunset review conducted in 2015).   |                               |           |
|  |         |          | Pending EPA decision   |                               |           |
|  |         |          |  |                               |           |
| Field and  | JB, HB, | TBD      | On hold as per NOP Jan 2018.   | TBD                           | TBD       |
| Greenhouse   | FT and  |          |  |                               |           |
| Container  | EO      |          |  |                               |           |
| Production   |         |          |  |                               |           |
| Strengthen and clarify the requirements for use of organic seed (NOP 5029) | НВ      | Proposal | Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at Fall 2017 meeting. | Jul 17<br><mark>Aug 21</mark> | Fall 2018 |
| Research Priorities  | All     | NA       | RPs due to MS Aug 2018   | NA                            | Fall 2018 |

| 2020 Sunsets   |  |             |                    |   |  |  |  |
|--|--|-------------|--------------------|---|--|--|--|
| TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |             |                    |   |  |  |  |
| Substance  |  | Con<br>tact | TR<br>requ<br>est? | Notes   | Scheduled,<br>Discussed                | Meeting                                      |  |
| Alcohols:<br>Ethanol<br>Isopropanol                          | 205.601(a)(1)(i),<br>205.601(a)(1)(ii) | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol | Feb 6<br>Aug 7                         | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |  |
| Sodium<br>carbonate<br>peroxyhydrate                         | 205.601(a)                             | EO          | N                  | 2006 TAP; 2014 TR                                     | Dec 5<br>Jul 3                         | и  |  |
| Newspaper or other recycled paper                            | 205.601(b) and (c)                     | НВ          | N                  | 2017 TR   | Dec 5<br>Jun 19                        | и  |  |
| Plastic mulch and covers                                     | 205.601(b)                             | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority    | Dec 19,<br>Jan 2<br><mark>Aug 7</mark> | и  |  |
| Aqueous<br>potassium<br>silicate                             | 205.601(e),<br>205.601(i)              | DM          | N                  | 2014 TR   | Jan 2,<br>Feb 6<br><mark>Aug 21</mark> | u  |  |

| Elemental sulfur | 205.601(e)(5),  | AB | Υ | 1995 TAP; 2017 TR for Livestock. TR  | Dec 19, | u |
|------------------|-----------------|----|---|--------------------------------------|---------|---|
|                  | 205.601(i)(10), |    |   | requested 07 28 17. In contracting.  | Jan 2   |   |
|                  | 205.601(j)(2)   |    |   | TR sent to CS 01 10 18. TR           | Feb 20  |   |
|                  |                 |    |   | sufficiency due 03 12 18. CS sent    | Aug 21  |   |
|                  |                 |    |   | additional questions to the TR       |         |   |
|                  |                 |    |   | contractor. TR final draft expected  |         |   |
|                  |                 |    |   | April 2018. TR addendum sent to CS   |         |   |
|                  |                 |    |   | 4 20 18                              |         |   |
| Lime sulfur      | 205.601(e)(6),  | SE | N | <u>2014 TR</u>                       | Dec 19  | u |
|                  | 205.601(i)(6)   |    |   |                                      | Jun 5   |   |
| Sucrose          | 205.601(e)(10)  | SB | N | <u>2005 TR</u>                       | Dec 19  | и |
| octanoate esters |                 |    |   |                                      | Jul 3   |   |
| Hydrated lime    | 205.601(i)(4)   | DM | N | 1995 TAP; 2001 TAP; 2002 TR for      | Jan 2,  | u |
|                  |                 |    |   | <u>Calcium Hydroxide</u>             | Aug 21  |   |
| Liquid fish      | 205.601(j)      | AB | N | 1995 TAP; 2006 TR                    | Jan 16, | u |
| products         |                 |    |   |                                      | Aug 21  |   |
| Sulfurous Acid   | 205.601(j)      | SE | N | 2010 TAP; 2014 TR                    | Dec 19  | u |
|                  |                 |    |   |                                      | Jun 5   |   |
| Ethylene         | 205.601(k)      | EO | N | 2000 Supplemental TAP; 2007 TAP;     | Dec 19  | u |
|                  |                 |    |   | 2011 Supplemental TR                 | Jul 3   |   |
| Microcrystalline | 205.601(o)      | SB | Υ | None. TR requested 07 28 17. In      | Dec 19, | и |
| cheesewax        |                 |    |   | contracting. TR sent to CS 01 11 18. | Feb 20  |   |
|                  |                 |    |   | TR found sufficient 02 20 18.        | Jul 3   |   |
| Potassium        | 205.602(e)      | НВ | N | 1995 TAP. Low priority               | Jan 16  | u |
| chloride         |                 |    |   |                                      | Aug 7   |   |
|                  |                 |    |   |                                      |         |   |

# 2021 Sunsets TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019

| Substance                                  | National<br>List §        | Con-<br>tact | TR re-<br>quest? | Notes   | Scheduled,<br>Discussed | Meeting                                      |
|--|---------------------------|--------------|------------------|---|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N                | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation                   |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y                | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov |                         | "  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y                | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov |                         | и  |
| Pheromones                                 | 205.601(f)                | SE           | N                | 2012 TR<br>2017 NOSB Recommendation                                       |                         | u  |
| Ferric phosphate                           | 205.601(h)                | SB           | N                | 2012 TR<br>2016 NOSB Recommendation                                       |                         | и  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N                | 2015 TR<br>2017 NOSB Recommendation                                       |                         | u u  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N                | 2011 TR<br>2017 NOSB Recommendation                                       |                         | u  |
| Hydrogen chloride                          | 205.601(n)                | АВ           | N                | 2014 Lmtd Scope TR 2016 NOSB Recommendation                               |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N                | 2016 sunset rec 2017 NOSB Recommendation                                  |                         | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N                | None 2017 NOSB Recommendation   |                         | u  |

| Fall 2018 Milestones                               | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment             | Aug 9, 2018              |
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| New NOSB member training                           | July 18, 2018            |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |

| NOP - Post proposals                        | On or before Sep 5, 2018 |
|---|--------------------------|
| Public comment closes                       | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call    | Oct 12, 2018             |
| NOP - Send compiled public comments to NOSB | Oct 8, 2018              |
| Public comment webinars                     | Oct 16 & 18, 2018        |
| Fall 2018 NOSB meeting - St. Paul, MN       | Oct 24-26, 2018          |

# Crops Subcommittee (CS) Notes Tuesday September 4, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Dave Mortensen (DM); Asa

Bradman (AB)

**Absent:** Eric Schwartz (ES); Jesse Buie (JB); Sue Baird (SB) **Staff:** Michelle Arsenault (MA); Devon Pattillo (DP)

| Work Agenda Petitioned Substance                    | oc           |                  |   |   |                                     |
|---|--------------|------------------|---|---|-------------------------------------|
| Petitioned Substance                                | 25           |                  |   |   |                                     |
| Substance   | Con-<br>tact | TR request?      | Notes   | Discussed,<br><mark>Voted</mark>                            | Meeting                             |
| Allyl Isothiocyanate (AITC) Petition (2016) 205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jul 17   | Fall 2018                           |
| Sodium Citrate<br>205.601                           | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018                           |
| Natamycin   | НВ           | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018                           |
| Ammonium Citrate<br>205.601                         | EO/DM        | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.  | Nov 21<br>Aug 7<br>Sep 4                                    | Petition<br>discussion<br>Fall 2018 |

|  |                         |                  | ·  |                                       | ,                                   |
|--|-------------------------|------------------|--|---------------------------------------|-------------------------------------|
| Ammonium<br>Glycinate<br>205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.   | Nov 21<br><mark>Aug 7</mark><br>Sep 4 | Petition<br>discussion<br>Fall 2018 |
| Calcium Acetate  | SE SB?                  | Y                | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in July 2018   | Feb 6<br><mark>Aug 21</mark>          | Petition<br>discussion<br>Fall 2018 |
| Paper pots   | НВ                      |                  | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18. Petition found sufficient 09 04 18.   | Aug 21<br>Sep 4                       | Petition<br>discussion<br>Fall 2018 |
| Other Topics   |                         |                  |  |                                       |                                     |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted                   | Meeting                             |
| Liquid fish annotation   | EO                      | Disc doc         | Approved by ES for addition to work agenda 05 18 18. Approved by NOP xx/xx/xx  | Jun 6                                 | TBD                                 |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues            | ЕО/НВ                   | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017             | TBD                                 |
| Biodegradable<br>Biobased Mulch<br>annotation change   | НВ/АВ                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017                           | TBD                                 |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                                   | TBD                                 |
| Field and<br>Greenhouse<br>Container<br>Production   | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP Jan 2018.   | TBD                                   | TBD                                 |

| Strengthen and                    | НВ  | Proposal | Originated in MS. Referred back to CS at                    | Jul 17 | Fall 2018 |
|-----------------------------------|-----|----------|---|--------|-----------|
| clarify the requirements for      |     |          | Spr 2017 meeting. Referred back to CS at Fall 2017 meeting. | Aug 21 |           |
| use of organic seed<br>(NOP 5029) |     |          |   |        |           |
| Research Priorities               | All | NA       | RPs due to MS Aug 2018                                      | NA     | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| Substance                            |  | Con<br>tact | TR<br>requ<br>est? | Notes  | Scheduled,<br>Discussed                           | Meeting                                      |
|--------------------------------------|--|-------------|--------------------|--|---|--|
| Alcohols:<br>Ethanol<br>Isopropanol  | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol  | Feb 6<br>Aug 7                                    | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                                    | и  |
| Newspaper or other recycled paper    | 205.601(b) and (c)                                 | НВ          | N                  | 2017 TR  | Dec 5<br>Jun 19                                   | и  |
| Plastic mulch and covers             | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br><mark>Aug 7</mark>            | и  |
| Aqueous<br>potassium<br>silicate     | 205.601(e),<br>205.601(i)                          | DM          | N                  | 2014 TR  | Jan 2,<br>Feb 6<br>Aug 21                         | и  |
| Elemental sulfur                     | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br><mark>Aug 21</mark> | u  |
| Lime sulfur                          | 205.601(e)(6),<br>205.601(i)(6)                    | SE          | N                  | 2014 TR  | Dec 19<br>Jun 5                                   | u u  |
| Sucrose octanoate esters             | 205.601(e)(10)                                     | SB          | N                  | 2005 TR  | Dec 19<br>Jul 3                                   | u  |

| Hydrated lime    | 205.601(i)(4) | DM | N | 1995 TAP; 2001 TAP; 2002 TR for      | Jan 2,             | u |
|------------------|---------------|----|---|--------------------------------------|--------------------|---|
|                  |               |    |   | <u>Calcium Hydroxide</u>             | Aug 21             |   |
| Liquid fish      | 205.601(j)    | AB | N | 1995 TAP; 2006 TR                    | Jan 16,            | u |
| products         |               |    |   |                                      | Aug 21             |   |
| Sulfurous Acid   | 205.601(j)    | SE | N | 2010 TAP; 2014 TR                    | Dec 19             | u |
|                  |               |    |   |                                      | <mark>Jun 5</mark> |   |
| Ethylene         | 205.601(k)    | EO | N | 2000 Supplemental TAP; 2007 TAP;     | Dec 19             | u |
|                  |               |    |   | 2011 Supplemental TR                 | <mark>Jul 3</mark> |   |
| Microcrystalline | 205.601(o)    | SB | Υ | None. TR requested 07 28 17. In      | Dec 19,            | u |
| cheesewax        |               |    |   | contracting. TR sent to CS 01 11 18. | Feb 20             |   |
|                  |               |    |   | TR found sufficient 02 20 18.        | Jul 3              |   |
| Potassium        | 205.602(e)    | НВ | N | 1995 TAP. Low priority               | Jan 16             | u |
| chloride         |               |    |   |                                      | Aug 7              |   |

- Paper pots (HB) petition discussion
- Ammonium glycinate and ammonium citrate (EO, DM) TR sufficiency review
- AITC petition addendum discussion
- Other items
- Adjourn

#### Discussion

- Paper pots (HB). The CS deemed the petition sufficient and the group discussed potential questions if they choose to request a TR. Paper pots contain synthetic adhesives that are not allowed. The NOP and CS discussed the scope of a TR or limited scope TR. The NOP will send the TR template, so the CS can develop some questions for a limited scope TR. The members also discussed the timeline given that this is a discussion document and will not be voted on this fall. The extension the NOP granted for the use of paper pots will expire soon, and since the Board won't be voting on it, they considered writing a resolution indicating that the removal of the material could create a hardship for small growers. EO will draft some language and circulate it to the group for the next call.
- Ammonium glycinate and ammonium citrate (EO, DM). The lead summarized the use of these
  materials based on the petition and technical report. Based on the petitioners most recent email
  communication the CS would like to modify the questions to the TR contractor to explore potential
  inaccuracies on the National List about chelates. Members discussed the need for efficacy data. The
  TR was not found sufficient at this time, and the CS will send further questions to the NOP for the
  TR contractor.
- AITC petition addendum. Deferred to next call.
- Other items. The Materials Subcommittee (MS) Chair asked that the Crops Subcommittee discuss and read the MS proposals for the Fall meeting so the members can familiarize themselves with the topics.
- The meeting was adjourned

### **Previous CS Notes**

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote 2020 Sunset: Elemental sulfur (AB) - Discuss proposal and vote 2020 Sunset: Liquid fish products (AB) - Discuss proposal and vote Calcium Acetate (SB) - Petition discussion document - discuss

Strengthen and clarify the requirements for use of organic seed (NOP 5029)

## September 4, 2018

AITC petition addendum - discussion

September 18, 2018

AITC petition addendum - discussion MS proposals (HB) discuss with CS Paper pots - Discuss resolution

October 2, 2018 October 16, 2018 November 6, 2018 November 20, 2018 December 4, 2018 December 18, 2018

| Fall 2018 Milestones                               | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment             | Aug 9, 2018              |
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| New NOSB member training                           | July 18, 2018            |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |
| NOP - Send compiled public comments to NOSB        | Oct 8, 2018              |
| Public comment webinars                            | Oct 16 & 18, 2018        |
| Fall 2018 NOSB meeting - St. Paul, MN              | Oct 24-26, 2018          |

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes   | Scheduled,<br>Discussed | Meeting                                      |
|--|---------------------------|--------------|-------------|---|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation                   |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y           | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov |                         | "  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov |                         | u  |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation                                       |                         | u  |
| Ferric phosphate                           | 205.601(h)                | SB           | N           | 2012 TR<br>2016 NOSB Recommendation                                       |                         | u .  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR 2017 NOSB Recommendation  |                         | u  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation                                       |                         | u  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation                               |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation                                  |                         | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N           | None 2017 NOSB Recommendation   |                         | u  |

# Crops Subcommittee (CS) Notes Tuesday August 21, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Jesse Buie (JB); Dave

Mortensen (DM); Asa Bradman (AB); Eric Schwartz (ES)

**Absent:** Sue Baird (SB)

**Staff:** Michelle Arsenault (MA); Clarissa Mathews (CM)

| Petitioned Substance   |       |                  |   |   |                                     |
|--|-------|------------------|---|---|-------------------------------------|
| Substance Con-<br>tact re-                                   |       | TR request?      | Notes   | Discussed,<br>Voted   | Meeting                             |
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016)<br>205.601 | JB    | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jul 17   | Fall 2018                           |
| Sodium Citrate<br>205.601                                    | НВ    | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018                           |
| Natamycin  | НВ    | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018                           |
| Ammonium Citrate<br>205.601                                  | EO/DM | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.  | Nov 21<br>Aug 7   | Petition<br>discussion<br>Fall 2018 |

| Ammonium<br>Glycinate<br>205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.   | Nov 21<br>Aug 7              | Petition<br>discussion<br>Fall 2018 |
|--|-------------------------|------------------|--|------------------------------|-------------------------------------|
| <u>Calcium Acetate</u>   | SE SB?                  | Y                | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in July 2018   | Feb 6<br><mark>Aug 21</mark> | Petition<br>discussion<br>Fall 2018 |
| Paper pots   | НВ                      |                  | Petition sent to CS 08 14 18. Petition suff/TR request due 10 13 18.   | Aug 21                       | Petition<br>discussion<br>Fall 2018 |
| Other Topics   |                         |                  |  |                              |                                     |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted          | Meeting                             |
| Liquid fish annotation   | EO                      | Disc doc         | Approved by ES for addition to work agenda 05 18 18. Approved by NOP xx/xx/xx  | Jun 6                        | TBD                                 |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues            | ЕО/НВ                   | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017    | TBD                                 |
| Biodegradable<br>Biobased Mulch<br>annotation change   | НВ/АВ                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017                  | TBD                                 |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                          | TBD                                 |
| Field and<br>Greenhouse<br>Container<br>Production   | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP Jan 2018.   | TBD                          | TBD                                 |

| Strengthen and                    | НВ  | Proposal | Originated in MS. Referred back to CS at                    | Jul 17 | Fall 2018 |
|-----------------------------------|-----|----------|---|--------|-----------|
| clarify the requirements for      |     |          | Spr 2017 meeting. Referred back to CS at Fall 2017 meeting. | Aug 21 |           |
| use of organic seed<br>(NOP 5029) |     |          |   |        |           |
| Research Priorities               | All | NA       | RPs due to MS Aug 2018                                      | NA     | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| Substance                            |  | Con<br>tact | TR<br>requ<br>est? | Notes  | Scheduled,<br>Discussed                           | Meeting                                      |
|--------------------------------------|--|-------------|--------------------|--|---|--|
| Alcohols:<br>Ethanol<br>Isopropanol  | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol  | Feb 6<br>Aug 7                                    | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                                    | и  |
| Newspaper or other recycled paper    | 205.601(b) and (c)                                 | НВ          | N                  | 2017 TR  | Dec 5<br>Jun 19                                   | и  |
| Plastic mulch and covers             | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br><mark>Aug 7</mark>            | и  |
| Aqueous<br>potassium<br>silicate     | 205.601(e),<br>205.601(i)                          | DM          | N                  | 2014 TR  | Jan 2,<br>Feb 6<br>Aug 21                         | и  |
| Elemental sulfur                     | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br><mark>Aug 21</mark> | u  |
| Lime sulfur                          | 205.601(e)(6),<br>205.601(i)(6)                    | SE          | N                  | 2014 TR  | Dec 19<br>Jun 5                                   | u u  |
| Sucrose octanoate esters             | 205.601(e)(10)                                     | SB          | N                  | 2005 TR  | Dec 19<br>Jul 3                                   | u  |

| 205.601(i)(4) | DM   | N  | <u>1995 TAP;</u> <u>2001 TAP;</u> <u>2002 TR for</u>               | Jan 2,   | u  |
|---------------|--|--|--|--|--|
|               |  |  | <u>Calcium Hydroxide</u>   | Aug 21   |  |
| 205.601(j)    | AB   | N  | 1995 TAP; 2006 TR  | Jan 16,  | u  |
|               |  |  |  | Aug 21   |  |
| 205.601(j)    | SE   | N  | 2010 TAP; 2014 TR  | Dec 19   | u  |
|               |  |  |  | <mark>Jun 5</mark>   |  |
| 205.601(k)    | EO   | N  | 2000 Supplemental TAP; 2007 TAP;                                   | Dec 19   | u  |
|               |  |  | 2011 Supplemental TR   | <mark>Jul 3</mark>   |  |
| 205.601(o)    | SB   | Υ  | None. TR requested 07 28 17. In                                    | Dec 19,  | u  |
|               |  |  | contracting. TR sent to CS 01 11 18.                               | Feb 20   |  |
|               |  |  | TR found sufficient 02 20 18.                                      | <mark>Jul 3</mark>   |  |
| 205.602(e)    | НВ   | N  | 1995 TAP. Low priority   | Jan 16   | u  |
|               |  |  |  | Aug 7  |  |
|               | 205.601(j)<br>205.601(j)<br>205.601(k)<br>205.601(o) | 205.601(j) AB  205.601(j) SE  205.601(k) EO  205.601(o) SB | 205.601(j) AB N  205.601(j) SE N  205.601(k) EO N  205.601(o) SB Y | Calcium Hydroxide           205.601(j)         AB         N         1995 TAP; 2006 TR           205.601(j)         SE         N         2010 TAP; 2014 TR           205.601(k)         EO         N         2000 Supplemental TAP; 2007 TAP; 2011 Supplemental TR           205.601(o)         SB         Y         None. TR requested 07 28 17. In contracting. TR sent to CS 01 11 18. TR found sufficient 02 20 18. | Calcium Hydroxide  Aug 21  205.601(j)  AB N 1995 TAP; 2006 TR Jan 16, Aug 21  205.601(j)  SE N 2010 TAP; 2014 TR Dec 19 Jun 5  205.601(k)  EO N 2000 Supplemental TAP; 2007 TAP; 2011 Supplemental TR Jul 3  205.601(o)  SB Y None. TR requested 07 28 17. In contracting. TR sent to CS 01 11 18. TR found sufficient 02 20 18.  Jul 3  205.602(e)  HB N 1995 TAP. Low priority  Jan 16 |

- 2020 Sunset: Aqueous potassium silicate (DM) Discuss proposal and vote
- 2020 Sunset: Hydrated lime (DM) Discuss proposal and vote
- 2020 Sunset: Elemental sulfur (AB) Discuss proposal and vote
- 2020 Sunset: Liquid fish products (AB) Discuss proposal and vote
- Calcium Acetate (SB) Petition discussion document discuss
- Strengthen and clarify the requirements for use of organic seed (NOP 5029)
- Paper pots (HB) petition discussion
- Other items
- Adjourn

#### Discussion

2020 Sunset: Aqueous potassium silicate (DM). The lead summarized the uses of the substance, noting its two listings. Some concerns and questions were not addressed during previous reviews. Members discussed alternatives and the addition of some questions to elicit feedback about efficacy and need. DM will reach out to a certifying agency who indicated their clients are using it, to glean more feedback.

Motion to remove aqueous potassium silicate at §205.601(e)

Motion by: DM Seconded by: AB

Additional discussion: None

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Motion to remove aqueous potassium silicate at §205.601(i)

Motion by: DM Seconded by: HB

Additional discussion: None

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0

• 2020 Sunset: Hydrated lime (DM). The lead summarized the uses of hydrated lime for disease management, which is used in coordination with copper. He also noted that it is widely used, the need is very high, and there is a robust set of efficacy data. A member noted that field worker exposure from use of lime is a concern, but in this instance, the lime is not applied in dust form, so exposure is reduced. Feedback was universally positive that hydrated lime is essential.

Motion to remove hydrated lime at §205.601(i)(4)

Motion by: DM Seconded by: JB Additional discussion:

Yes: 0 No: 7 Abstain: 0 Absent: 1 Recuse: 0

• 2020 Sunset: Elemental sulfur (AB). The lead summarized the uses of sulfur as well as previous comments, noting that it is the most heavily used pesticide in US, both in conventional and organic ag. There was a recently updated TR that included more in-depth info regarding health effects on farm workers. The new TR did not alter the position that this material should be renewed.

Motion to remove elemental sulfur at §205.601(e)(5), 205.601(i)(10), and 205.601(j)(2)

Motion by: AB Seconded by: HB

Additional discussion: None

Yes: 0 No: 7 Abstain: 0 Absent: 1 Recuse: 0

• **2020 Sunset: Liquid fish products (AB).** The lead summarized the uses and manufacture of liquid fish products noting that the CS will be looking at the use of wild caught fish as fertilizer in a separate project. The substance has minimal environmental impact as long as it is used appropriately. Historically there has been strong support for liquid fish products.

Motion to remove liquid fish products at §205.601(j)

Motion by: AB Seconded by: JB

Additional discussion: None

Yes: 0 No: 6 Abstain: 1 Absent: 1 Recuse: 0

Calcium Acetate - Petition discussion document (SE for SB). The CS Chair wrote and shared a
document for the group to discuss.

Motion to accept the discussion document on calcium acetate

Motion by: SE Seconded by: ES

Additional discussion: None

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Strengthen and clarify the requirements for use of organic seed (NOP 5029) (HB). The lead summarized the discussion document, noting some of the changes since the last discussion. Members discussed the clarity and structure of the document, noting that this could be a model for future documents. A member asked about "improvement" vs "due diligence", and how that would be documented.

Motion to accept the discussion document to strengthen and clarify the requirements for use of organic seed (NOP 5029)

Motion by: HB

Seconded by: DM

Additional discussion: None

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0

• Paper pots (HB). The CS Chair summarized the status of the petition, and explained why the discussion document was added to the Fall agenda very recently. The petition for paper pots was not received in time for the NOSB to complete its review before its Fall meeting, and to allow the community to weigh in on the need for this material, the CS decided to develop a discussion document while it completes its review. The extension granted by the NOP on the use of paper pots is about to expire, and if no longer allowed could have negative effects on farmers. The CS may request a TR. The NOP emphasized the need to review the generic material and not a specific product. The CS also discussed putting forth a resolution at the meeting, asking that the NOP grant an extension for the use of paper pots until the NOSB can complete its review. The CS will discuss potential questions for the TR during a later call. AB will send some modifications to the questions to HB for inclusion, who will then send them on to the Crops Chair.

Motion to accept the discussion document on paper pots

Motion by: HB Seconded by: JB

Additional discussion: None

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Other items. None.

• The meeting was adjourned

### **Previous CS Notes**

### Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

August 7, 2018

2020 Sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote 2020 Sunset: Plastic mulch and covers (HB) - Discuss proposal and vote 2020 Sunset: Potassium chloride (HB) - Discuss proposal and vote Ammonium Citrate (EO/DM) - Petition discussion document - discuss Ammonium Glycinate (EO/DM) - Petition discussion document - discuss

August 21, 2018

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote 2020 Sunset: Elemental sulfur (AB) - Discuss proposal and vote 2020 Sunset: Liquid fish products (AB) - Discuss proposal and vote Calcium Acetate (SB) - Petition discussion document - discuss

Strengthen and clarify the requirements for use of organic seed (NOP 5029)

September 4, 2018

AITC petition addendum - discussion

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

December 18, 2018

| NOP - Publish FRN, Open public comment             | Aug 9, 2018              |
|--|--------------------------|
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| New NOSB member training                           | July 18, 2018            |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |
| NOP - Send compiled public comments to NOSB        | Oct 8, 2018              |
| Public comment webinars                            | Oct 16 & 18, 2018        |
| Fall 2018 NOSB meeting - St. Paul, MN              | Oct 24-26, 2018          |

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes   | Scheduled,<br>Discussed | Meeting                                      |
|--|---------------------------|--------------|-------------|---|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation                   |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y           | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov |                         | "  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18. Due Early Nov |                         | u  |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation                                       |                         | u  |
| Ferric phosphate                           | 205.601(h)                | SB           | N           | 2012 TR<br>2016 NOSB Recommendation                                       |                         | u .  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR 2017 NOSB Recommendation  |                         | u  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation                                       |                         | u  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation                               |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation                                  |                         | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N           | None 2017 NOSB Recommendation   |                         | u  |

# Crops Subcommittee (CS) Notes Tuesday August 7, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Jesse Buie (JB); Dave

Mortensen (DM); Asa Bradman (AB); Eric Schwartz (ES)

Absent: Sue Baird (SB)

**Staff:** Michelle Arsenault (MA); Clarissa Mathews (CM)

| Substance  | Con- TR |                  | Notes   | Discussed,  | Meeting                             |
|--|---------|------------------|---|---|-------------------------------------|
|  | tact    | request?         |   | Voted   |                                     |
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016)<br>205.601 | JB      | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jul 17   | Fall 2018                           |
| Sodium Citrate<br>205.601                                    | НВ      | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018                           |
| <u>Natamycin</u>   | НВ      | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018                           |
| Ammonium Citrate<br>205.601                                  | EO/DM   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.  | Nov 21<br>Aug 7   | Petition<br>discussion<br>Fall 2018 |

| Ammonium<br>Glycinate<br>205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018. TR sent to CS 07 30 18. Response due 09 28 18.   | Nov 21<br><mark>Aug 7</mark> | Petition<br>discussion<br>Fall 2018 |
|--|-------------------------|------------------|--|------------------------------|-------------------------------------|
| <u>Calcium Acetate</u>   | SB                      | Y                | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in July 2018   | Feb 6<br>Aug 21              | Petition<br>discussion<br>Fall 2018 |
| Other Topics   |                         |                  |  |                              |                                     |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted          | Meeting                             |
| Liquid fish annotation   | EO                      | Disc doc         | Approved by ES for addition to work agenda 05 18 18. Approved by NOP xx/xx/xx  | Jun 6                        | TBD                                 |
| (Manure<br>treatments)<br>Anaerobic<br>Digestate - Food<br>Waste<br>205.601(j) and<br>other manure<br>issues | ЕО/НВ                   | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017    | TBD                                 |
| Biodegradable<br>Biobased Mulch<br>annotation change   | НВ/АВ                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017                  | TBD                                 |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change           | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                          | TBD                                 |
| Field and Greenhouse Container Production  | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP Jan 2018.   | TBD                          | TBD                                 |
| Strengthen and clarify the requirements for use of organic seed (NOP 5029)                                   | НВ                      | Proposal         | Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at Fall 2017 meeting.   | Jul 17<br>Aug 21             | Fall 2018                           |

| Research Priorities | All | NA | A RPs due to MS Aug 2018 |  | Fall 2018 |
|---------------------|-----|----|--------------------------|--|-----------|
|                     |     |    |                          |  |           |

| Substance                            |  | Con  | TR           | Notes  | Scheduled,                             | Meeting                          |
|--------------------------------------|--|------|--------------|--|--|----------------------------------|
|                                      |  | tact | requ<br>est? |  | Discussed                              |                                  |
| Alcohols:                            | 205.601(a)(1)(i),                                  | JB   | N            | 1995 TAP; 2014 TR - Ethanol; 2014  | Feb 6                                  | Summary                          |
| Ethanol<br>Isopropanol               | 205.601(a)(1)(ii)                                  |      |              | TR - Isopropanol   | Aug 7                                  | Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate | 205.601(a)   | EO   | N            | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                         | и                                |
| Newspaper or other recycled paper    | 205.601(b) and (c)                                 | НВ   | N            | 2017 TR  | Dec 5<br>Jun 19                        | "                                |
| Plastic mulch and covers             | 205.601(b)   | НВ   | N            | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br><mark>Aug 7</mark> | u                                |
| Aqueous<br>potassium<br>silicate     | 205.601(e),<br>205.601(i)                          | DM   | N            | 2014 TR  | Jan 2,<br>Feb 6<br>Aug 21              | "                                |
| Elemental sulfur                     | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB   | Y            | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br>Aug 21   | и                                |
| Lime sulfur                          | 205.601(e)(6),<br>205.601(i)(6)                    | SE   | N            | <u>2014 TR</u>   | Dec 19<br><mark>Jun 5</mark>           | u                                |
| Sucrose octanoate esters             | 205.601(e)(10)                                     | SB   | N            | 2005 TR  | Dec 19<br>Jul 3                        | u                                |
| Hydrated lime                        | 205.601(i)(4)                                      | DM   | N            | 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide  | Jan 2,<br>Aug 21                       | и                                |
| Liquid fish<br>products              | 205.601(j)   | AB   | N            | 1995 TAP; 2006 TR  | Jan 16,<br>Aug 21                      | u                                |
| Sulfurous Acid                       | 205.601(j)   | SE   | N            | 2010 TAP; 2014 TR  | Dec 19<br>Jun 5                        | u                                |

| Ethylene                      | 205.601(k) | EO | N | 2000 Supplemental TAP; 2007 TAP;   | Dec 19                       | u |
|-------------------------------|------------|----|---|--|------------------------------|---|
|                               |            |    |   | 2011 Supplemental TR   | Jul 3                        |   |
| Microcrystalline<br>cheesewax | 205.601(o) | SB | Y | None. TR requested 07 28 17. In contracting. TR sent to CS 01 11 18. TR found sufficient 02 20 18. | Dec 19,<br>Feb 20<br>Jul 3   | и |
| Potassium chloride            | 205.602(e) | НВ | N | 1995 TAP. Low priority   | Jan 16<br><mark>Aug 7</mark> | и |

- 2020 Sunset: Alcohols: Ethanol Isopropanol (JB) Discuss proposal and vote
- 2020 Sunset: Plastic mulch and covers (HB) Discuss proposal and vote
- 2020 Sunset: Potassium chloride (HB) Discuss proposal and vote
- Ammonium Citrate (EO/DM) Petition discussion document discuss
- Ammonium Glycinate (EO/DM) Petition discussion document discuss
- Calcium Acetate (SB) Petition discussion document discuss
- Other items
- Adjourn

#### Discussion

• 2020 Sunset: Alcohols: Ethanol, Isopropanol (JB). The lead briefly summarized the two alcohols and the group proceeded to a vote.

Motion to remove alcohols: ethanol at §205.601

Motion by: JB Seconded by: HB

Additional discussion: none

Yes: 0 No: 7 Abstain: 0 Absent: 1 Recuse: 0

Motion to remove alcohols: Isopropanol at §205.601

Motion by: JB Seconded by: EO

Additional discussion: none

Yes: 0 No: 7 Abstain: 0 Absent: 1 Recuse: 0

• **2020 Sunset: Plastic mulch and covers (HB).** The lead summarized the uses of plastic mulch, and noted support from stakeholders for its relisting.

Motion to remove plastic mulch and covers at §205.601(b)

Motion by: HB Seconded by: DM

Additional discussion: none

Yes: 0 No: 6 Abstain: 1 Absent: 1 Recuse: 0

• **2020 Sunset: Potassium chloride (HB).** On 205.602 (prohibited), with an annotation. The lead summarized the uses of the material, as well as previous public comment. Commenters suggested that the NOSB review all dust suppressants.

Motion to remove potassium chloride at §205.602(e)

Motion by: HB Seconded by: EO

Additional discussion: none

Yes: 0 No: 7 Abstain: 0 Absent: 1 Recuse: 0

• Ammonium Citrate, Ammonium Glycinate (EO/DM). Petition discussion document. The two petitions were discussed together, as they are nearly identical except for the specific materials. The lead summarized the history of the review, noting that it was petitioned in 2016. The members reviewed the TR, which was received recently, and will send additional questions to the TR contractor regarding chelating agents as a whole. The CS will further discuss these materials and the TRs on a later call, after the TR contractor responds. The CS plans to post a discussion document to elicit comments from the public prior to completing its review. A member added that it would be helpful to seek efficacy data.

Motion to accept the petition discussion documents on ammonium citrate and ammonium glycinate

Motion by: EO Seconded by: DM

Additional discussion: none

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0

- Calcium Acetate (SB) Petition discussion document. Deferred to next call.
- 2020 Sunset: Aqueous potassium silicate (DM). Deferred to next call.
- 2020 Sunset: Hydrated lime (DM). Deferred to next call.
- Other items.
  - Liquid fish annotation work agenda item. Will discuss on next call.
  - Paper pots petition. NOP received a revised petition for paper pots and is currently reviewing it for completeness. In the interest of not disrupting the industry, and because many farmers view paper pots as essential, the NOSB would like to express a need for an extension until the review can be completed.
  - A member suggested the NOP contract a limited scope TR to provide an update on biodegradable plastic mulch testing results.
  - HB asked the Crops members to review the seed document and send any comments to her prior to the next call.
- The meeting was adjourned

### **Previous CS Notes**

# Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

July 17, 2018 (no Asa)

Research priorities (All) - discuss and finalize list.

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote

2020 Sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote

2020 Sunset: Plastic mulch and covers (HB) - Discuss proposal and vote

2020 Sunset: Potassium chloride (HB) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) (HB) - discuss

Allyl Isothiocyanate (AITC) (JB) - Discuss proposal and vote

### August 7, 2018

2020 Sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote 2020 Sunset: Plastic mulch and covers (HB) - Discuss proposal and vote

2020 Sunset: Potassium chloride (HB) - Discuss proposal and vote Ammonium Citrate (EO/DM) - Petition discussion document - discuss Ammonium Glycinate (EO/DM) - Petition discussion document - discuss

August 21, 2018

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote 2020 Sunset: Elemental sulfur (AB) - Discuss proposal and vote 2020 Sunset: Liquid fish products (AB) - Discuss proposal and vote Calcium Acetate (SB) - Petition discussion document - discuss

Strengthen and clarify the requirements for use of organic seed (NOP 5029)

September 4, 2018

AITC petition addendum - discussion

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

December 18, 2018

| Fall 2018 Milestones                               | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment             | TBD                      |
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| New NOSB member training                           | July 18, 2018            |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |
| NOP - Send compiled public comments to NOSB        | Oct 8, 2018              |
| Public comment webinars                            | Oct 16 & 18, 2018        |
| Fall 2018 NOSB meeting - St. Paul, MN              | Oct 24-26, 2018          |

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes  | Scheduled,<br>Discussed | Meeting                                      |
|--|---------------------------|--------------|-------------|--|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation    |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y           | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | u  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Υ           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | u .  |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation                        |                         | u  |
| Ferric phosphate                           | 205.601(h)                | SB           | N           | 2012 TR<br>2016 NOSB Recommendation                        |                         | u  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR<br>2017 NOSB Recommendation                        |                         | u .  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation                        |                         | u  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation                |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation                   |                         | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N           | None 2017 NOSB Recommendation                              |                         | и  |

# Crops Subcommittee (CS) Notes Tuesday July 17, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Sue Baird (SB); Jesse Buie

(JB); Dave Mortensen (DM)

Absent: Asa Bradman (AB); Eric Schwartz (ES)

Staff: Michelle Arsenault (MA); Clarissa Mathews (CM); Devon Pattillo (DP)

| Substance  | Con-<br>tact | TR request?      | Notes   | Discussed,<br><mark>Voted</mark>                            | Meeting                             |
|--|--------------|------------------|---|---|-------------------------------------|
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016)<br>205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jul 17   | Fall 2018                           |
| Sodium Citrate<br>205.601                                    | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018                           |
| Natamycin  | НВ           | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018                           |
| Ammonium Citrate<br>205.601                                  | EO/DM        | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018  | Nov 21<br>Aug 7   | Petition<br>discussion<br>Fall 2018 |

| Ammonium Glycinate 205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018   | Nov 21<br>Aug 7           | Petition<br>discussion<br>Fall 2018 |
|--|-------------------------|------------------|--|---------------------------|-------------------------------------|
| Calcium Acetate  | SB                      | Y                | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in August 2018   | Feb 6<br>Aug 7            | Petition<br>discussion<br>Fall 2018 |
| Other Topics   |                         |                  |  |                           |                                     |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted       | Meeting                             |
| Liquid fish annotation   | EO                      | Disc doc         | Approved by ES for addition to work agenda 05 18 18. Approved by NOP xx/xx/xx  | Jun 6                     | TBD                                 |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues            | ЕО/НВ                   | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017 | TBD                                 |
| Biodegradable<br>Biobased Mulch<br>annotation change   | нв/ав                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017               | TBD                                 |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                       | TBD                                 |
| Field and Greenhouse Container Production  | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP Jan 2018.   | TBD                       | TBD                                 |
| Strengthen and clarify the requirements for use of organic seed (NOP 5029)                         | НВ                      | Proposal         | Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at Fall 2017 meeting.   | Jul 17<br>Aug 7           | Fall 2018                           |

| Research Priorities | All | NA | RPs due to MS Aug 2018 | NA | Fall 2018 |
|---------------------|-----|----|------------------------|----|-----------|
|                     |     |    |                        |    |           |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets<br>TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |             |                    |  |                                      |  |
|--|--|-------------|--------------------|--|--------------------------------------|--|
| Substance  |  | Con<br>tact | TR<br>requ<br>est? | Notes  | Scheduled,<br>Discussed              | Meeting                                    |
| Alcohols:<br>Ethanol<br>Isopropanol  | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol  | Feb 6<br>Aug 7                       | Summar<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate   | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                       | u  |
| Newspaper or other recycled paper  | 205.601(b) and (c)                                 | НВ          | N                  | 2017 TR  | Dec 5<br>Jun 19                      | u  |
| Plastic mulch and covers   | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br>Aug 7            | u  |
| Aqueous<br>potassium<br>silicate   | 205.601(e),<br>205.601(i)                          | DM          | N                  | 2014 TR  | Jan 2,<br>Feb 6<br>Aug 7             | и  |
| Elemental sulfur   | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br>Aug 21 | и  |
| Lime sulfur  | 205.601(e)(6),<br>205.601(i)(6)                    | SE          | N                  | 2014 TR  | Dec 19<br><mark>Jun 5</mark>         | "  |
| Sucrose octanoate esters   | 205.601(e)(10)                                     | SB          | N                  | 2005 TR  | Dec 19<br>Jul 3                      | u  |
| Hydrated lime  | 205.601(i)(4)                                      | DM          | N                  | 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide  | Jan 2,<br>Aug 7                      | и  |
| Liquid fish<br>products  | 205.601(j)   | AB          | N                  | 1995 TAP; 2006 TR  | Jan 16,<br>Aug 21                    | "  |
| Sulfurous Acid   | 205.601(j)   | SE          | N                  | 2010 TAP; 2014 TR  | Dec 19<br>Jun 5                      | u  |

| Ethylene                   | 205.601(k) | EO | N | 2000 Supplemental TAP; 2007 TAP;   | Dec 19                     | u   |
|----------------------------|------------|----|---|--|----------------------------|-----|
|                            |            |    |   | 2011 Supplemental TR   | Jul 3                      |     |
| Microcrystalline cheesewax | 205.601(o) | SB | Y | None. TR requested 07 28 17. In contracting. TR sent to CS 01 11 18. TR found sufficient 02 20 18. | Dec 19,<br>Feb 20<br>Jul 3 | u . |
| Potassium<br>chloride      | 205.602(e) | НВ | N | 1995 TAP. Low priority   | Jan 16<br>Aug 7            | и   |

- Research priorities (All).
- 2020 Sunset: Aqueous potassium silicate (DM) Discuss proposal and vote
- 2020 Sunset: Hydrated lime (DM) Discuss proposal and vote
- 2020 Sunset: Alcohols: Ethanol Isopropanol (JB) Discuss proposal and vote
- 2020 Sunset: Plastic mulch and covers (HB) Discuss proposal and vote
- 2020 Sunset: Potassium chloride (HB) Discuss proposal and vote
- Strengthen and clarify the requirements for use of organic seed (NOP 5029) (HB) discuss
- Research priorities (All) Discuss and finalize list
- Allyl Isothiocyanate (AITC) (JB) Discuss proposal and vote
- Other items
- Adjourn

### **Discussion**

- Research priorities (All). Members discussed the current list and whether to remove any priorities. The lead will refine some of the language for the current items.
- Allyl Isothiocyanate (AITC) (JB). The lead summarized the petition and the Subcommittee proceeded to a vote. The Subcommittee indicated in its review that this substance fails to satisfy the OFPA criteria

Motion to classify allyl isothiocyanate (AITC) as synthetic

Motion by: JB Seconded by: HB

Additional discussion: none

Yes: 6 No: 0 Abstain: 0 Absent: 2 Recuse: 0

Motion to add allyl isothiocyanate (AITC) at §205.601

Motion by: JB Seconded by: EO

Additional discussion: none

Yes: 0 No: 6 Abstain: 0 Absent: 2 Recuse: 0

- Strengthen and clarify the requirements for use of organic seed (NOP 5029) (HB). The group discussed and modified some language in the draft discussion document. The lead will make the changes and the CS will vote on the next call.
- **2020 Sunset: Aqueous potassium silicate (DM).** The group discussed the review and added some questions for public comment. The CS deferred the vote to the next call, so members could re-review previous public comment.

- 2020 Sunset: Hydrated lime (DM). Deferred to next call.
- 2020 Sunset: Alcohols: Ethanol Isopropanol (JB). Deferred to next call.
- 2020 Sunset: Plastic mulch and covers (HB). Deferred to next call.
- 2020 Sunset: Potassium chloride (HB). Deferred to next call.
- Other items. None
- The meeting was adjourned

### **Previous CS Notes**

### Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

July 3, 2018

2020 Sunset: Sodium carbonate peroxyhydrate (EO) - Discuss proposal and vote

2020 Sunset: Ethylene (EO) - Discuss proposal and vote

2020 Sunset: Sucrose octanoate esters (SB) - Discuss proposal and vote

2020 Sunset: Microcrystalline cheesewax (SB) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) - discuss

Research priorities - discuss and finalize list.

### July 17, 2018 (no Asa)

Research priorities (All) - discuss and finalize list.

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote

2020 Sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote

2020 Sunset: Plastic mulch and covers (HB) - Discuss proposal and vote

2020 Sunset: Potassium chloride (HB) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) (HB) - discuss and vote

Allyl Isothiocyanate (AITC) (JB) - Discuss proposal and vote

### August 7, 2018

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote

2020 Sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote

2020 Sunset: Plastic mulch and covers (HB) - Discuss proposal and vote

2020 Sunset: Potassium chloride (HB) - Discuss proposal and vote

Ammonium Citrate (EO/DM) - Petition discussion document - discuss

Ammonium Glycinate (EO/DM) - Petition discussion document - discuss

Calcium Acetate (SB) - Petition discussion document - discuss

Strengthen and clarify the requirements for use of organic seed (NOP 5029) (HB) - Discuss and vote

# August 21, 2018

2020 Sunset: Elemental sulfur (AB) - Discuss proposal and vote

2020 Sunset: Liquid fish products (AB) - Discuss proposal and vote

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

December 18, 2018

| Fall 2018 Milestones                           | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment         | TBD                      |
| NOSB Request for TRs for 2021 sunset materials | Jun 6, 2018              |

| New NOSB member training                           | July 18, 2018            |
|--|--------------------------|
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |
| NOP - Send compiled public comments to NOSB        | Oct 8, 2018              |
| Public comment webinars                            | Oct 16 & 18, 2018        |
| Fall 2018 NOSB meeting - St. Paul, MN              | Oct 24-26, 2018          |

| Substance                                  | National<br>List §        | Con-<br>tact | TR request? | Notes  | Scheduled,<br>Discussed | Meeting                                      |
|--|---------------------------|--------------|-------------|--|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N           | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation    |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y           | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | u  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Υ           | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | u .  |
| Pheromones                                 | 205.601(f)                | SE           | N           | 2012 TR<br>2017 NOSB Recommendation                        |                         | u  |
| Ferric phosphate                           | 205.601(h)                | SB           | N           | 2012 TR<br>2016 NOSB Recommendation                        |                         | u  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N           | 2015 TR<br>2017 NOSB Recommendation                        |                         | u .  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N           | 2011 TR<br>2017 NOSB Recommendation                        |                         | u  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N           | 2014 Lmtd Scope TR 2016 NOSB Recommendation                |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N           | 2016 sunset rec 2017 NOSB Recommendation                   |                         | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N           | None 2017 NOSB Recommendation                              |                         | и  |

# National Organic Standards Board (NOSB) Crops Subcommittee (CS) Notes Tuesday July 3, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Sue Baird (SB); Jesse Buie

(JB); Eric Schwartz (ES); Dave Mortensen (DM)

Absent: Asa Bradman (AB)
Staff: Michelle Arsenault (MA)

| Petitioned Substanc  | es           |                  |   |   |           |
|--|--------------|------------------|---|---|-----------|
| Substance  | Con-<br>tact | TR request?      | Notes   | Discussed,<br>Voted   | Meeting   |
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016)<br>205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jul 17   | Fall 2018 |
| Sodium Citrate<br>205.601                                    | НВ           | Υ                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018 |
| <u>Natamycin</u>   | НВ           | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018 |

| Ammonium Citrate<br>205.601  | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018   | Nov 21<br>Aug 7           | Petition<br>discussion<br>Fall 2018 |
|--|-------------------------|------------------|--|---------------------------|-------------------------------------|
| Ammonium<br>Glycinate<br>205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018   | Nov 21<br>Aug 7           | Petition<br>discussion<br>Fall 2018 |
| <u>Calcium Acetate</u>   | SB                      | Y                | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in July 2018   | Feb 6<br>Aug 7            | Petition<br>discussion<br>Fall 2018 |
| Other Topics   |                         |                  |  |                           |                                     |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted       | Meeting                             |
| Liquid fish annotation   | EO                      | Disc doc         | Approved by ES for addition to work agenda 05 18 18. Approved by NOP xx/xx/xx  | Jun 6                     | TBD                                 |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues            | ЕО/НВ                   | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017 | TBD                                 |
| Biodegradable<br>Biobased Mulch<br>annotation change   | НВ/АВ                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017               | TBD                                 |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                       | TBD                                 |
| Field and Greenhouse Container Production  | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP Jan 2018.   | TBD                       | TBD                                 |

| Strengthen and  | НВ  | Proposal | Originated in MS. Referred back to CS at                    | Jul 17 | Fall 2018 |
|---|-----|----------|---|--------|-----------|
| clarify the requirements for use of organic seed (NOP 5029) |     |          | Spr 2017 meeting. Referred back to CS at Fall 2017 meeting. |        |           |
| Research Priorities   | All | NA       | RPs due to MS Aug 2018                                      | NA     | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets                         | 2020 Sunsets TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |             |                    |  |                                      |  |  |
|--------------------------------------|---|-------------|--------------------|--|--------------------------------------|--|--|
| TR Requests: July 2                  | 2017, Summary: Sp   | r 2018,     | Keview             | 7: Fall 2018   |                                      |  |  |
| Substance                            |   | Con<br>tact | TR<br>requ<br>est? | Notes  | Scheduled,<br>Discussed              | Meeting                                      |  |
| Alcohols:<br>Ethanol<br>Isopropanol  | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)                                    | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol  | Feb 6<br>Jul 17                      | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |  |
| Sodium<br>carbonate<br>peroxyhydrate | 205.601(a)  | EO          | N                  | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                       | и  |  |
| Newspaper or other recycled paper    | 205.601(b) and (c)  | НВ          | N                  | 2017 TR  | Dec 5<br>Jun 19                      | u  |  |
| Plastic mulch and covers             | 205.601(b)  | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br>Jul 17           | и  |  |
| Aqueous<br>potassium<br>silicate     | 205.601(e),<br>205.601(i)   | DM          | N                  | 2014 TR  | Jan 2 <i>,</i><br>Feb 6<br>Jul 17    | и  |  |
| Elemental sulfur                     | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2)                        | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br>Aug 21 | u  |  |
| Lime sulfur                          | 205.601(e)(6),<br>205.601(i)(6)   | SE          | N                  | 2014 TR  | Dec 19<br><mark>Jun 5</mark>         | u  |  |
| Sucrose octanoate esters             | 205.601(e)(10)  | SB          | N                  | 2005 TR  | Dec 19<br>Jul 3                      | и  |  |

| Hydrated lime    | 205.601(i)(4) | DM | N | 1995 TAP; 2001 TAP; 2002 TR for      | Jan 2,             | u |
|------------------|---------------|----|---|--------------------------------------|--------------------|---|
|                  |               |    |   | <u>Calcium Hydroxide</u>             | Jul 17             |   |
| Liquid fish      | 205.601(j)    | AB | N | 1995 TAP; 2006 TR                    | Jan 16,            | u |
| products         |               |    |   |                                      | Aug 21             |   |
| Sulfurous Acid   | 205.601(j)    | SE | N | 2010 TAP; 2014 TR                    | Dec 19             | u |
|                  |               |    |   |                                      | <mark>Jun 5</mark> |   |
| Ethylene         | 205.601(k)    | EO | N | 2000 Supplemental TAP; 2007 TAP;     | Dec 19             | u |
|                  |               |    |   | 2011 Supplemental TR                 | Jul 3              |   |
| Microcrystalline | 205.601(o)    | SB | Υ | None. TR requested 07 28 17. In      | Dec 19,            | u |
| cheesewax        |               |    |   | contracting. TR sent to CS 01 11 18. | Feb 20             |   |
|                  |               |    |   | TR found sufficient 02 20 18.        | Jul 3              |   |
| Potassium        | 205.602(e)    | НВ | N | 1995 TAP. Low priority               | Jan 16             | u |
| chloride         |               |    |   |                                      | Jul 17             |   |
|                  |               |    |   |                                      |                    |   |

- 2020 Sunset: Sucrose octanoate esters (SB) Discuss proposal and vote
- 2020 Sunset: Microcrystalline cheesewax (SB) Discuss proposal and vote
- 2020 Sunset: Aqueous potassium silicate (DM) Discuss proposal and vote
- 2020 Sunset: Hydrated lime (DM) Discuss proposal and vote
- 2020 Sunset: Sodium carbonate peroxyhydrate (EO) Discuss proposal and vote
- 2020 Sunset: Ethylene (EO) Discuss proposal and vote
- Research priorities discuss and finalize list.
- Strengthen and clarify the requirements for use of organic seed (NOP 5029) discuss
- Other items
- Adjourn

### Discussion

• **Sucrose octanoate esters (SB).** The lead summarized the uses, previous review history, and comments, and the Subcommittee moved to a vote.

Motion to remove sucrose octanoate esters at §205.601

Motion by: SB Seconded by: JB

Additional discussion: None

Yes: 0 No: 7 Abstain: 0 Absent: 1 Recuse: 0

• Microcrystalline cheesewax (SB). The lead summarized the uses, review history, and previous comments. Microcrystalline cheesewax was originally denied, and subsequently approved for addition to the list. A member noted that she has seen this material not biodegrade, and therefore she is going to vote to not relist.

Motion to remove microcrystalline cheesewax at §205.601

Motion by: SB Seconded by: EO

Additional discussion: None

Yes: 2 No: 4 Abstain: 1 Absent: 1 Recuse: 0

- 2020 Sunset: Aqueous potassium silicate (DM). Deferred to July 17
- 2020 Sunset: Hydrated lime (DM). Deferred to July 17
- 2020 Sunset: Sodium carbonate peroxyhydrate (EO). The lead summarized the material and its uses. She reached out to a certifier to ask about current use, and was told it is not in wide use. A member asked about its use as a replacement for copper sulfate, and if its removal would increase the use of copper sulfate.

Motion to remove sodium carbonate peroxyhydrate at §205.601

Motion by: EO Seconded by: JB

Additional discussion: None

Yes: 2 No: 5 Abstain: 0 Absent: 1 Recuse: 0

 2020 Sunset: Ethylene (EO). The lead summarized the public comment, noting that growers of all scales were supportive of relisting. Commenters also noted that this product doesn't really fit into any OFPA criteria. It has been on the list for a long time and is in wide use to make crops more viable for export. Member felt that removal would have economic impact.

Motion to remove ethylene at §205.601

Motion by: EO Seconded by: HB

Additional discussion: None

Yes: 0 No: 7 Abstain: 0 Absent: 1 Recuse: 0

- Strengthen and clarify the requirements for use of organic seed (NOP 5029). Deferred to July 17 call.
- Research priorities (All). There are seven previous research priorities and three new suggestions. A member noted that there is language in the farm bill directing NIFA to take note of the NOSB research priorities. A member suggested two possible additions. One, a follow up from one of the import panelists regarding assessment of organic production capacity e.g. corn production, and a second on organic production and shipping methods and how those methods affect food quality. A member added mildew, especially in spinach crops in CA, as an issue. The lead will make modifications to the document as discussed on the call, including collapsing some of the individual items under a new category for diseases.
- Other items. None
- The meeting was adjourned

## **Previous CS Notes**

### Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

June 19, 2018

2020 Sunset: Newspaper or other recycled paper (HB) - Discuss proposal and vote

2020 Sunset: Sucrose octanoate esters (SB) - Discuss proposal and vote

2020 Sunset: Microcrystalline cheesewax (SB) - Discuss proposal and vote

Natamycin (HB) - Discuss proposal and vote Sodium Citrate (HB) - Discuss proposal and vote

July 3, 2018

2020 Sunset: Sodium carbonate peroxyhydrate (EO) - Discuss proposal and vote

2020 Sunset: Ethylene (EO) - Discuss proposal and vote

2020 Sunset: Sucrose octanoate esters (SB) - Discuss proposal and vote 2020 Sunset: Microcrystalline cheesewax (SB) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) - discuss

Research priorities - discuss and finalize list.

July 17, 2018 (no Asa)

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote

2020 Sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote 2020 Sunset: Plastic mulch and covers (HB) - Discuss proposal and vote

2020 Sunset: Potassium chloride (HB) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) (HB) - discuss

Research priorities (All) - discuss and finalize list.

Allyl Isothiocyanate (AITC) (JB) - Discuss proposal and vote

August 7, 2018

Calcium Acetate (SB) - Petition discussion document - discuss

August 21, 2018

2020 Sunset: Elemental sulfur (AB) - Discuss proposal and vote 2020 Sunset: Liquid fish products (AB) - Discuss proposal and vote

September 4, 2018 September 18, 2018 October 2, 2018 October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

December 18, 2018

| Fall 2018 Milestones                               | Target dates (tentative) |  |  |
|--|--------------------------|--|--|
| NOP - Publish FRN, Open public comment             | TBD                      |  |  |
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |  |  |
| New NOSB member training                           | July 18, 2018            |  |  |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |  |  |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |  |  |
| NOP - Post proposals                               | On or before Sep 5, 2018 |  |  |
| Public comment closes                              | Oct 4, 2018              |  |  |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |  |  |
| NOP - Send compiled public comments to NOSB        | Oct 8, 2018              |  |  |
| Public comment webinars                            | Oct 16 & 18, 2018        |  |  |
| Fall 2018 NOSB meeting - St. Paul, MN              | Oct 24-26, 2018          |  |  |

| Substance                                  | National<br>List §        | Con-<br>tact | TR re-<br>quest? | Notes  | Scheduled,<br>Discussed | Meeting                                      |
|--|---------------------------|--------------|------------------|--|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N                | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation    |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y                | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | и  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y                | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | u  |
| Pheromones                                 | 205.601(f)                | SE           | N                | 2012 TR<br>2017 NOSB Recommendation                        |                         | и  |
| Ferric phosphate                           | 205.601(h)                | SB           | N                | 2012 TR<br>2016 NOSB Recommendation                        |                         | u  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N                | 2015 TR<br>2017 NOSB Recommendation                        |                         | u  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N                | 2011 TR<br>2017 NOSB Recommendation                        |                         | и  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N                | 2014 Lmtd Scope TR 2016 NOSB Recommendation                |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N                | 2016 sunset rec 2017 NOSB Recommendation                   |                         | u  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N                | None 2017 NOSB Recommendation                              |                         | и  |

## National Organic Standards Board (NOSB) Crops Subcommittee (CS) Meeting Notes Tuesday June 19, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Asa Bradman (AB); Sue

Baird (SB); Jesse Buie (JB); Eric Schwartz (ES)

**Absent:** Dave Mortensen (DM) **Staff:** Michelle Arsenault (MA)

| Substance   | Con-<br>tact | TR request?      | Notes   | Discussed,<br><mark>Voted</mark>                            | Meeting   |
|---|--------------|------------------|---|---|-----------|
| Allyl Isothiocyanate AITC) Petition (2016) (205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jul 17   | Fall 2018 |
| Sodium Citrate<br>205.601                           | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018 |
| <u>Natamycin</u>                                    | НВ           | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018 |

| Ammonium Citrate<br>205.601  | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018   | Nov 21<br>Aug 7           | Petition<br>discussion<br>Fall 2018 |
|--|-------------------------|------------------|--|---------------------------|-------------------------------------|
| Ammonium Glycinate 205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018   | Nov 21<br>Aug 7           | Petition<br>discussion<br>Fall 2018 |
| <u>Calcium Acetate</u>   | SB                      | Y                | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in July 2018   | Feb 6<br>Aug 7            | Petition<br>discussion<br>Fall 2018 |
| Other Topics   |                         |                  |  |                           |                                     |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted       | Meeting                             |
| Liquid fish annotation   | EO                      | Disc doc         | Approved by ES for addition to work agenda 05 18 18. Approved by NOP xx/xx/xx  | Jun 6                     | Fall 2018                           |
| (Manure<br>treatments)<br>Anaerobic<br>Digestate - Food<br>Waste<br>205.601(j) and<br>other manure<br>issues | ЕО/НВ                   | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017 | Fall 2018                           |
| Biodegradable<br>Biobased Mulch<br>annotation change   | НВ/АВ                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017               | TBD                                 |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change           | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                       | TBD                                 |
| Field and Greenhouse Container Production  | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP Jan 2018.   | TBD                       | TBD                                 |

| Strengthen and      | НВ  | Proposal | Originated in MS. Referred back to CS at | Jul 3 | TBD       |
|---------------------|-----|----------|--|-------|-----------|
| clarify the         |     |          | Spr 2017 meeting. Referred back to CS at |       |           |
| requirements for    |     |          | Fall 2017 meeting.                       |       |           |
| use of organic seed |     |          |  |       |           |
| (NOP 5029)          |     |          |  |       |           |
|                     |     |          |  |       |           |
| Research Priorities | All | NA       | RPs due to MS Aug 2018                   | NA    | Fall 2018 |
|                     |     |          |  |       |           |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets   |  |             |                    |  |                                      |  |  |  |  |  |
|--|--|-------------|--------------------|--|--------------------------------------|--|--|--|--|--|
| TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |             |                    |  |                                      |  |  |  |  |  |
| Substance  |  | Con<br>tact | TR<br>requ<br>est? | Notes  | Scheduled,<br>Discussed              | Meeting                                      |  |  |  |  |
| Alcohols:<br>Ethanol<br>Isopropanol                          | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol  | Feb 6<br>Jul 17                      | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |  |  |  |  |
| Sodium<br>carbonate<br>peroxyhydrate                         | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                       | u  |  |  |  |  |
| Newspaper or other recycled paper                            | 205.601(b) and (c)                                 | НВ          | N                  | 2017 TR  | Dec 5<br><mark>Jun 19</mark>         | и  |  |  |  |  |
| Plastic mulch and covers                                     | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br>Jul 17           | и  |  |  |  |  |
| Aqueous<br>potassium<br>silicate                             | 205.601(e),<br>205.601(i)                          | DM          | N                  | 2014 TR  | Jan 2,<br>Feb 6<br>Jul 3             | u  |  |  |  |  |
| Elemental sulfur   | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br>Aug 21 | u  |  |  |  |  |
| Lime sulfur  | 205.601(e)(6),<br>205.601(i)(6)                    | SE          | N                  | 2014 TR  | Dec 19<br>Jun 5                      | u  |  |  |  |  |
| Sucrose octanoate esters                                     | 205.601(e)(10)                                     | SB          | N                  | 2005 TR  | Dec 19<br>Jul 3                      | и  |  |  |  |  |

| Hydrated lime    | 205.601(i)(4) | DM | N | 1995 TAP; 2001 TAP; 2002 TR for      | Jan 2,             | u |
|------------------|---------------|----|---|--------------------------------------|--------------------|---|
|                  |               |    |   | <u>Calcium Hydroxide</u>             | Jul 3              |   |
| Liquid fish      | 205.601(j)    | AB | N | <u>1995 TAP</u> ; <u>2006 TR</u>     | Jan 16,            | u |
| products         |               |    |   |                                      | Aug 21             |   |
| Sulfurous Acid   | 205.601(j)    | SE | N | 2010 TAP; 2014 TR                    | Dec 19             | и |
|                  |               |    |   |                                      | <mark>Jun 5</mark> |   |
| Ethylene         | 205.601(k)    | EO | N | 2000 Supplemental TAP; 2007 TAP;     | Dec 19             | и |
|                  |               |    |   | 2011 Supplemental TR                 | Jul 3              |   |
| Microcrystalline | 205.601(o)    | SB | Υ | None. TR requested 07 28 17. In      | Dec 19,            | и |
| cheesewax        |               |    |   | contracting. TR sent to CS 01 11 18. | Feb 20             |   |
|                  |               |    |   | TR found sufficient 02 20 18.        | Jul 3              |   |
| Potassium        | 205.602(e)    | НВ | N | 1995 TAP. Low priority               | Jan 16             | u |
| chloride         |               |    |   |                                      | Jul 17             |   |
|                  |               |    |   |                                      |                    |   |

- Research priorities (RPs) schedule for discussion
- Natamycin (HB) Discuss proposal and vote
- Sodium Citrate (HB) Discuss proposal and vote
- Allyl Isothiocyanate (AITC) (JB) Discuss proposal
- 2020 sunsets:
  - Newspaper or other recycled paper (HB) Discuss proposal and vote)
  - o Aqueous potassium silicate (DM) Discuss proposal and vote
  - o Hydrated lime (DM) Discuss proposal and vote
  - O Sucrose octanoate esters (SB) Discuss proposal and vote
  - o Microcrystalline cheesewax (SB) Discuss proposal and vote
- Other items
- Adjourn

#### Discussion

- Research priorities (RPs). The lead/liaison summarized the process for the research priorities and offered to circulate last year's RPs so the members can determine which ones to keep, and which to add. She also asked that the CS schedule a time to discuss them.
- Natamycin (HB). The lead summarized the material's uses and the group discussed classification. EPA encompasses a broader definition and considers natamycin an antibiotic. The petitioner is asking for use as a post-harvest handling product, however, members are concerned that if the NOSB classifies natamycin as non-synthetic (based on the materials' classification guidance) it could be used for other purposes beyond what it is being petitioned for. The CS is also concerned about the crossover between the use of natamycin for human health and its use on crops. Therefore the Subcommittee is proposing to list it at 205.602 prohibited. The lead will add some clarifying language to the proposal regarding the previous review and classification.

Motion to classify natamycin as non-synthetic

Motion by: HB Seconded by: EO

Additional discussion: None

Yes: 6 No: 0 Abstain: 1 Absent: 1 Recuse: 0

Motion to add natamycin to §205.602 - nonsynthetic substances prohibited for use in organic crop production

Motion by: HB Seconded by: EO

Additional discussion: Members further discussed post-harvest handling use. The lead

recommended the group reread the TR before the meeting.

Yes: 6 No: 0 Abstain: 1 Absent: 1 Recuse: 0

• Sodium Citrate (HB). The lead summarized the uses of the material, noting that review of a subinput is not typical. Sodium Citrate is used as an anticoagulant in blood meal. The lead will make some minor edits based on comments by CS members.

Motion to classify sodium citrate as synthetic

Motion by: HB Seconded by: EO Additional discussion:

Yes: 6 No: 0 Abstain: 1 Absent: 1 Recuse: 0

Motion to add sodium citrate at §205.601 with the following annotation: for use as

anticoagulant for use in blood meal

Motion by: HB Seconded by: EO

Additional discussion: None

Yes: 6 No: 0 Abstain: 1 Absent: 1 Recuse: 0

• **2020 sunset: Newspaper or other recycled paper (HB).** The lead summarized the review for the group and the CS moved to a vote.

Motion to remove newspaper or other recycled paper at §205.601(b) and (c)

Motion by: HB Seconded by: AB

Additional discussion: None

Yes: 0 No: 6 Abstain: 1 Absent: 1 Recuse: 0

- Other items. None
- The meeting was adjourned

## **Previous CS Notes**

#### Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

June 5, 2018

Natamycin (HB) - Discuss proposal and vote Sodium Citrate (HB). Discuss proposal and vote Allyl Isothiocyanate (AITC) (JB) - Discuss proposal 2020 Sunsets:

> Lime sulfur (SE) - Discuss proposal and vote Sulfurous Acid (SE) - Discuss proposal and vote

June 19, 2018

2020 Sunset: Newspaper or other recycled paper (HB) - Discuss proposal and vote

2020 Sunset: Sucrose octanoate esters (SB) - Discuss proposal and vote

2020 Sunset: Microcrystalline cheesewax (SB) - Discuss proposal and vote

Natamycin (HB) - Discuss proposal and vote

Sodium Citrate (HB) - Discuss proposal and vote

#### July 3, 2018

2020 Sunset: Aqueous potassium silicate (DM) - Discuss proposal and vote

2020 Sunset: Hydrated lime (DM) - Discuss proposal and vote

2020 Sunset: Sodium carbonate peroxyhydrate (EO) - Discuss proposal and vote

2020 Sunset: Ethylene (EO) - Discuss proposal and vote

2020 Sunset: Sucrose octanoate esters (SB) - Discuss proposal and vote 2020 Sunset: Microcrystalline cheesewax (SB) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) - discuss

Research priorities - discuss and finalize list.

#### July 17, 2018 (no Asa)

Allyl Isothiocyanate (AITC) (JB) - Discuss proposal and vote

2020 Sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote 2020 Sunset: Plastic mulch and covers (HB) - Discuss proposal and vote 2020 Sunset: Potassium chloride (HB) - Discuss proposal and vote

#### August 7, 2018

Ammonium Citrate (EO/DM) - Petition discussion document - discuss Ammonium Glycinate (EO/DM) - Petition discussion document - discuss Calcium Acetate (SB) - Petition discussion document - discuss

#### August 21, 2018

2020 Sunset: Elemental sulfur (AB) - Discuss proposal and vote 2020 Sunset: Liquid fish products (AB) - Discuss proposal and vote

September 4, 2018 September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

| Fall 2018 Milestones                               | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment             | TBD                      |
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| New NOSB member training                           | July 18, 2018            |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |
| NOP - Send compiled public comments to NOSB        | Oct 8, 2018              |
| Public comment webinars                            | Oct 16 & 18, 2018        |
| Fall 2018 NOSB meeting - St. Paul, MN              | Oct 24-26, 2018          |

# 2021 Sunsets TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019

| Substance           | National<br>List § | Con-<br>tact | TR re-<br>quest? | Notes                          | Scheduled, | Meeting   |
|---------------------|--------------------|--------------|------------------|--------------------------------|------------|-----------|
|                     | דופר א             | tact         | questi           |                                | Discussed  |           |
| Hydrogen peroxide   | 205.601(a),        | JB           | N                | 2015 Hydrogen Peroxide (Crops) |            | Summary:  |
|                     | 205.601(i)         |              |                  | 2017 NOSB Recommendation       |            | Spr 2019  |
|                     |                    |              |                  |                                |            | Review:   |
|                     |                    |              |                  |                                |            | Fall 2019 |
| Soaps, ammonium     | 205.601(d)         | SB           | Υ                | 1996 TAP                       |            | u         |
|                     |                    |              |                  | 2017 NOSB Recommendation       |            |           |
|                     |                    |              |                  | CS Requested TR 05 15 18       |            |           |
| Oils, horticultural | 205.601(e),        | SE           | Υ                | 1995 TAP                       |            | u         |
| (Narrow range oils) | 205.601(i)         |              |                  | 2017 NOSB Recommendation       |            |           |
|                     |                    |              |                  | CS Requested TR 05 15 18       |            |           |
| Pheromones          | 205.601(f)         | SE           | N                | 2012 TR                        |            | u         |
|                     |                    |              |                  | 2017 NOSB Recommendation       |            |           |
| Ferric phosphate    | 205.601(h)         | SB           | N                | 2012 TR                        |            | u         |
|                     |                    |              |                  | 2016 NOSB Recommendation       |            |           |
| Potassium           | 205.601(i)         | EO           | N                | 2015 TR                        |            | и         |
| bicarbonate         |                    |              |                  | 2017 NOSB Recommendation       |            |           |
| Magnesium sulfate   | 205.601(j)         | EO           | N                | 2011 TR                        |            | и         |
|                     |                    |              |                  | 2017 NOSB Recommendation       |            |           |
| Hydrogen chloride   | 205.601(n)         | AB           | N                | 2014 Lmtd Scope TR             |            | и         |
|                     |                    |              |                  | 2016 NOSB Recommendation       |            |           |
| Ash from manure     | 205.602(a)         | НВ           | N                | 2016 sunset rec                |            | и         |
| burning             |                    |              |                  | 2017 NOSB Recommendation       |            |           |
| Sodium              | 205.602(f)         | НВ           | N                | None                           |            | u         |
| fluoaluminate       |                    |              |                  | 2017 NOSB Recommendation       |            |           |
|                     |                    |              |                  |                                |            |           |

## National Organic Standards Board (NOSB) Crops Subcommittee (CS) Meeting Notes Tuesday June 5, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Asa Bradman (AB); Sue

Baird (SB)

Absent: Jesse Buie (JB); Dave Mortensen (DM)

Guest Speaker: Meg McGrath, Cornell University Plant Pathology

Staff: Michelle Arsenault (MA); Paul Lewis

| Substance  | Con-<br>tact | TR request?      | Notes   | Discussed,<br><mark>Voted</mark>                            | Meeting   |
|--|--------------|------------------|---|---|-----------|
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016)<br>205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jun 19   | Fall 2018 |
| Sodium Citrate<br>205.601                                    | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015). TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17. Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 19 | Fall 2018 |
| <u>Natamycin</u>   | НВ           | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5<br>Jun 19                          | Fall 2018 |

| Ammonium Citrate<br>205.601  | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018   | Nov 21<br>Aug 7           | Petition<br>discussion<br>Fall 2018 |
|--|-------------------------|------------------|--|---------------------------|-------------------------------------|
| Ammonium<br>Glycinate<br>205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17. TR expected in July 2018   | Nov 21<br>Aug 7           | Petition<br>discussion<br>Fall 2018 |
| <u>Calcium Acetate</u>   | SB                      | Y                | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18. TR expected in July 2018   | Feb 6<br>Aug 7            | Petition<br>discussion<br>Fall 2018 |
| Other Topics   |                         |                  |  |                           |                                     |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted       | Meeting                             |
| Liquid fish annotation   | EO                      | Disc doc         | Approved by ES for addition to work agenda 05 18 18. Approved by NOP xx/xx/xx  | Jun 6                     | Fall 2018                           |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues            | ЕО/НВ                   | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017 | Fall 2018                           |
| Biodegradable<br>Biobased Mulch<br>annotation change   | НВ/АВ                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17. On<br>hold Pending further research   | Aug 1, 2017               | TBD                                 |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                       | Fall 2018                           |
| Field and Greenhouse Container Production  | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP Jan 2018.   | TBD                       | TBD                                 |

| Strengthen and      | НВ  | Proposal | Originated in MS. Referred back to CS at | Jul 3 | TBD       |
|---------------------|-----|----------|--|-------|-----------|
| clarify the         |     |          | Spr 2017 meeting. Referred back to CS at |       |           |
| requirements for    |     |          | Fall 2017 meeting.                       |       |           |
| use of organic seed |     |          |  |       |           |
| (NOP 5029) -        |     |          |  |       |           |
| Research Priorities | All | NA       | RPs due to MS Aug 2018                   | NA    | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets<br>TR Requests: July 2  | 2020 Sunsets<br>TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |             |                    |  |                                      |  |  |  |  |  |  |
|--------------------------------------|--|-------------|--------------------|--|--------------------------------------|--|--|--|--|--|--|
| Substance                            |  | Con<br>tact | TR<br>requ<br>est? | Notes  | Scheduled,<br>Discussed              | Meeting                                      |  |  |  |  |  |
| Alcohols:<br>Ethanol<br>Isopropanol  | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)                                       | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol  | Feb 6<br>Jul 17                      | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |  |  |  |  |  |
| Sodium<br>carbonate<br>peroxyhydrate | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                       | u  |  |  |  |  |  |
| Newspaper or other recycled paper    | 205.601(b) and (c)   | НВ          | N                  | 2017 TR  | Dec 5<br>Jun 19                      | и  |  |  |  |  |  |
| Plastic mulch and covers             | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br>Jul 17           | и  |  |  |  |  |  |
| Aqueous<br>potassium<br>silicate     | 205.601(e),<br>205.601(i)  | DM          | N                  | 2014 TR  | Jan 2,<br>Feb 6<br>Jun 19            | u  |  |  |  |  |  |
| Elemental sulfur                     | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2)                           | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br>Aug 21 | "  |  |  |  |  |  |
| Lime sulfur                          | 205.601(e)(6),<br>205.601(i)(6)  | SE          | N                  | 2014 TR  | Dec 19<br>Jun 5                      | и  |  |  |  |  |  |
| Sucrose octanoate esters             | 205.601(e)(10)   | SB          | N                  | 2005 TR  | Dec 19<br>Jun 19                     | u  |  |  |  |  |  |
| Hydrated lime                        | 205.601(i)(4)  | DM          | N                  | 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide  | Jan 2,<br>Jun 19                     | и  |  |  |  |  |  |

| Liquid fish      | 205.601(j) | AB | N | 1995 TAP; 2006 TR                    | Jan 16,            | u |
|------------------|------------|----|---|--------------------------------------|--------------------|---|
| products         |            |    |   |                                      | Aug 21             |   |
| Sulfurous Acid   | 205.601(j) | SE | N | 2010 TAP; 2014 TR                    | Dec 19             | u |
|                  |            |    |   |                                      | <mark>Jun 5</mark> |   |
| Ethylene         | 205.601(k) | EO | N | 2000 Supplemental TAP; 2007 TAP;     | Dec 19             | u |
|                  |            |    |   | 2011 Supplemental TR                 | Jul 3              |   |
| Microcrystalline | 205.601(o) | SB | Υ | None. TR requested 07 28 17. In      | Dec 19,            | u |
| cheesewax        |            |    |   | contracting. TR sent to CS 01 11 18. | Feb 20             |   |
|                  |            |    |   | TR found sufficient 02 20 18.        | Jun 19             |   |
| Potassium        | 205.602(e) | НВ | N | 1995 TAP. Low priority               | Jan 16             | u |
| chloride         |            |    |   |                                      | Jul 17             |   |
| chloride         |            |    |   |                                      | Jul 17             |   |

- Guest speaker: Meg McGrath, Cornell University Plant Pathology.
- Discuss new full board petition process
- Liquid fish annotation work agenda discussion
- Natamycin (HB) Discuss proposal and vote
- Sodium Citrate (HB). Discuss proposal and vote
- Allyl Isothiocyanate (AITC) (JB) Discuss proposal and vote?
- 2020 Sunsets:
  - Lime sulfur (SE) Discuss proposal and vote
  - O Sulfurous Acid (SE) Discuss proposal and vote
- Other items
- Adjourn

#### Discussion

- **Guest speaker:** Meg McGrath, of Cornell University Plant Pathology, joined the call to talk about how the NOSB can collaborate with IR-4, which is a program that registers pesticides for specialty crops. Dr. McGrath mentioned that she is increasingly working with organic and is interested in filling in some gaps in data, and independent data sets. The Crops Chair suggested that the NOSB research priorities would be the best vehicle to use to engage with the IR-4. Meg referred the group to an online searchable database called Plant Disease Management Reports. MA will check with the AgLibrary for access. Meg also offered to be a resource for future inquiries and offered to connect the NOSB to colleagues in other states.
- Preliminary petition discussion document. The NOSB spoke about the new process on the last ES call. The goal is to post a petition discussion document prior to posting a proposal, to give the full Board an opportunity to engage with the petition earlier, so members can provide feedback. This will also allow the Board to glean public comment and feedback to use while crafting a proposal. The NOSB will pilot this with petitions that are currently awaiting TRs. A member suggested a format in the form of a 1-2 page summary, with a general overview and a couple of questions for the public.
- Liquid fish annotation work agenda discussion. This work agenda item to prohibit the use of wild
  caught fish for fertilizer was approved verbally by NOP. The CS is currently working on questions for
  a TR. However, the group discussed posting a 1-page discussion document with questions for public
  feedback before requesting a TR. A member asked that the Subcommittee define some terms more
  clearly, such as "native" and what constitutes wild caught. The Chair will refine the request and
  send it to NOP for written approval.

- Natamycin (HB). The group discussed the proposal to add natamycin to 205.602 as part of the petition review, and the NOP agreed that they do not need to request a separate work agenda item to do so. HB will draft the proposal, and further discuss this with NOP to determine what implications it could have for Livestock.
- Sodium Citrate (HB). The lead summarized the material and the group discussed this category of
  crop inputs/processing aids. The petition does not indicated or suggest a specific section on
  205.601, and the group would like to ask the NOP for advice. Additionally, they questioned whether
  or not it would complicate the review for blood meal. HB will draft the proposal and the group will
  discuss it on the next call.
- Allyl Isothiocyanate (AITC) (JB) Deferred to next call
- 2020 Sunsets:
  - Lime sulfur (SE). The lead summarized the substances use, indicating that it is in wide use.
     The CS moved to a vote.

Motion to remove lime sulfur

Motion by: SE Seconded by: EO

Additional discussion: none

Yes: 0 No: 5 Abstain: 0 Absent: 2 Recuse: 0

 Sulfurous Acid (SE). Public commenters were supportive of relisting. The lead noted that sulfurous acid is a critical component for use on slightly alkaline soils. The CS moved to a vote.

Motion to remove sulfurous acid

Motion by: SE Seconded by: HB

Additional discussion: none

Yes: 0 No: 5 Abstain: 0 Absent: 2 Recuse: 0

#### Other items.

- Sulfur annotation. The group discussed a previous idea of restricting sulfur dust, but some
  have since changed their mind based on public comment. It was clear from comments that
  there are many growers using it out of necessity because of limited water supply.
- The meeting was adjourned

#### **Previous CS Notes**

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

May 15, 2018

2021 sunsets - Determine need for TRs Natamycin (HB) - Discuss proposal and vote Sodium Citrate (HB). Discuss proposal and vote Allyl Isothiocyanate (AITC) (JB) - Discuss proposal

June 5, 2018

Natamycin (HB) - Discuss proposal and vote Sodium Citrate (HB). Discuss proposal and vote Allyl Isothiocyanate (AITC) (JB) - Discuss proposal 2020 Sunsets:

Lime sulfur (SE) - Discuss proposal and vote

Sulfurous Acid (SE) - Discuss proposal and vote

June 19, 2018

2020 Sunsets:

Newspaper or other recycled paper (HB) - Discuss proposal and vote)

Aqueous potassium silicate (DM) - Discuss proposal and vote

Hydrated lime (DM) - Discuss proposal and vote

Sucrose octanoate esters (SB) - Discuss proposal and vote

Microcrystalline cheesewax (SB) - Discuss proposal and vote

Natamycin (HB) - Discuss proposal and vote

Sodium Citrate (HB) - Discuss proposal and vote

Allyl Isothiocyanate (AITC) (JB) - Discuss proposal

July 3, 2018

2020 Sunsets:

Sodium carbonate peroxyhydrate (EO) - Discuss proposal and vote

Ethylene (EO) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) - discuss

July 17, 2018 (no Asa)

2020 Sunsets:

Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote

Plastic mulch and covers (HB) - Discuss proposal and vote

Potassium chloride (HB) - Discuss proposal and vote

August 7, 2018

Ammonium Citrate (EO/DM) Petition discussion document - discuss

Ammonium Glycinate (EO/DM) Petition discussion document - discuss

Calcium Acetate (SB) Petition discussion document - discuss

August 21, 2018

2020 Sunsets:

Elemental sulfur (AB) - Discuss proposal and vote Liquid fish products (AB) - Discuss proposal and vote

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

| Fall 2018 Milestones                               | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment             | May 18, 2018             |
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| New NOSB member training                           | July 18, 2018            |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |
| Discuss/finalize work agendas on ES call           | Oct 12, 2018             |

| NOP - Send compiled public comments to NOSB | Oct 8, 2018       |
|---|-------------------|
| Public comment webinars                     | Oct 16 & 18, 2018 |
| Fall 2018 NOSB meeting - St. Paul, MN       | Oct 24-26, 2018   |

| 2021 Sunsets<br>TR Requests: July 202      | 18, Summary: S            | pr 2019,     | Review: F        | all 2019   |                         |  |
|--|---------------------------|--------------|------------------|--|-------------------------|--|
| Substance                                  | National<br>List §        | Con-<br>tact | TR re-<br>quest? | Notes  | Scheduled,<br>Discussed | Meeting                                      |
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N                | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation    |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y                | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | u  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y                | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | и  |
| Pheromones                                 | 205.601(f)                | SE           | N                | 2012 TR 2017 NOSB Recommendation                           |                         | u  |
| Ferric phosphate                           | 205.601(h)                | SB           | N                | 2012 TR<br>2016 NOSB Recommendation                        |                         | u  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N                | 2015 TR<br>2017 NOSB Recommendation                        |                         | u  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N                | 2011 TR<br>2017 NOSB Recommendation                        |                         | и  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N                | 2014 Lmtd Scope TR 2016 NOSB Recommendation                |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N                | 2016 sunset rec 2017 NOSB Recommendation                   |                         | и  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N                | None 2017 NOSB Recommendation                              |                         | и  |

## National Organic Standards Board (NOSB) Crops Subcommittee (CS) Meeting Notes Tuesday May 15, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Dave Mortensen (DM); Asa

Bradman (AB); Sue Baird (SB) **Absent:** Jesse Buie (JB)

Staff: Michelle Arsenault (MA); Devon Pattillo (DP)

| Substance  | Con- | TR               | Notes   | Discussed,   | Meeting   |
|--|------|------------------|---|--|-----------|
|  | tact | request?         |   | Voted  |           |
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016)<br>205.601 | JB   | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6<br>Jun 5   | Fall 2018 |
| Sodium Citrate<br>205.601                                    | НВ   | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015). TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17. Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3<br>Jun 5 | Fall 2018 |
| Natamycin  | НВ   | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5,<br>Mar 3<br>Jun 5                                   | Fall 2018 |

| Ammonium Ctrate 205.601  |  |        |          |  |              |           |
|--|--|--------|----------|--|--------------|-----------|
| Suff/TR request due 12 26 17. TR requested   12 17.  |  | EO/DM  | Y        | suff/TR request due 12 26 17. TR requested   | Nov 21       | TBD       |
| Project   Contact   Cont   | <u>Glycinate</u>   | EO/DM  | Y        | suff/TR request due 12 26 17. TR requested   | Nov 21       | TBD       |
| Project Contact Contac | <u>Calcium Acetate</u>   | SB     | Y        | request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific  | Feb 6        | TBD       |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues  Biodegradable Biobased Mulch annotation change Prohibition of NPEs in inerts - annotation change EPA List 4 Inerts annotation change Field and Greenhouse Container Production Field and Container Production Field and Container Production Field and Carify the requirements for use of organic seed (NOP 5029)  Tel Spin Jan 2017  Disc Doc Detition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition sent to NOP 010 06 15. Petition sent to NOP 010 06 15. Petition sent to NOP 010 10 06 15. Petition sent to NOP 10 06 15. Petition sent to NOP 10 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent mem to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment.  Biodegradable Biobased Mulch annotation change Disc Doc Details and to CS 27 17. CS found TR suff 01 03 17. Pending further research  Prohibition of NPEs in inerts - annotation change/ EPA List 4 Inerts annotation change/ EPA List 4 Inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision  TBD TBD  TBD  TBD  TBD  TBD  TBD  TBD  | Other Topics   |        |          |  |              |           |
| (Manure treatments)       EO/HB       Disc Doc treatments       Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR regt sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS 06 11 (1) and other manure issues       Aug 1, Aug 1, Aug 15, 2017         Biodegradable Biobased Mulch annotation change       HB/AB       Disc Doc 16. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment.       Aug 1, Aug 15, 2017         Prohibition of NPEs in inerts - annotation change/EPA List 4 Inerts annotation change       HB/EO/ DM/AB FT and Container Production       Disc Doc 19. Disc Doc/Prop Production       IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision       TBD       Fall 2018         Field and Greenhouse Container Production       FT and EO       On hold as per NOP Jan 2018.       TBD       TBD       TBD         Strengthen and clarify the requirements for use of organic seed (NOP 5029)       HB       Proposal       Originated in MS. Referred back to CS at Fall 2017 meeting.       Jul 3       TBD   | Project  | Con-   | Doc type | Notes*   | Discussed/   | Meeting   |
| treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues Biodegradable Biobased Mulch annotation change/ EPA List 4 Inerts annotation change  Field and Goreenhouse Container Production  Strengthen and clarify the requirements for use of organic seed (NOP 5029)  Field and Cortainer Production  Trequest for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment.  Limited scope TR request sent to NOP 08 02 16. TR sent to CS on 12 28 16. TR Suff due 02 27 17. CS found TR suff 01 03 17. Pending further research  Food Doc/Prop annotation of NPEs in inerts - annotation change/ EPA List 4 Inerts annotation change  FT and EO  TBD  Fall 2018  FB D  TBD  TBD  TBD  TBD  TBD  TBD  TBD  |  | tact   |          |  | <b>Voted</b> |           |
| Biobased Mulch annotation change  Prohibition of NPEs in inerts - annotation change/ EPA List 4 Inerts annotation change  Field and Greenhouse Container Production  Strengthen and clarify the requirements for use of organic seed (NOP 5029)  Biobased Mulch annotation Change  ABJEO/ DDisc IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 Inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision  TBD TBD TBD  TBD  TBD  TBD  TBD  TBD   | treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure | ЕО/НВ  | Disc Doc | request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting | Aug 15,      | Fall 2018 |
| in inerts - annotation change/ EPA List 4 Inerts annotation change  EPA List 4 Inerts annotation change  IPA List 4 Inerts annotation change  IPA List 4 Inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision  IBD  TBD  TBD  TBD  TBD  TBD  TBD  TBD  | Biobased Mulch   | НВ/АВ  | Disc Doc | 16. TR sent to CS on 12 28 16. TR Suff due 02 27 17. CS found TR suff 01 03 17.  | Aug 1, 2017  | TBD       |
| Greenhouse Container Production  Strengthen and clarify the requirements for use of organic seed (NOP 5029)  FT and EO  Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at Fall 2017 meeting.   | in inerts -<br>annotation change/<br>EPA List 4 Inerts                   |        |          | requested July 2014.  DD - April 2016.  EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015).   | TBD          | Fall 2018 |
| clarify the requirements for use of organic seed (NOP 5029)  Spr 2017 meeting. Referred back to CS at Fall 2017 meeting.   | Greenhouse<br>Container  | FT and | TBD      | On hold as per NOP Jan 2018.   | TBD          | TBD       |
| Research Priorities All NA RPs due to MS Aug 2018 NA Fall 2018   | clarify the requirements for use of organic seed                         | НВ     | Proposal | Spr 2017 meeting. Referred back to CS at   | Jul 3        | TBD       |
|  | Research Priorities  | All    | NA       | RPs due to MS Aug 2018   | NA           | Fall 2018 |

| TR Requests: July 2                 | 2017, Summary: Sp                                  | r 2018,     | Reviev             | v: Fall 2018   |                                      |   |
|-------------------------------------|--|-------------|--------------------|--|--------------------------------------|---|
| Substance                           |  | Con<br>tact | TR<br>requ<br>est? | Notes  | Scheduled,<br>Discussed              | Meeting                                     |
| Alcohols:<br>Ethanol<br>Isopropanol | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol  | Feb 6<br>Jul 17                      | Summary<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium carbonate peroxyhydrate      | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR  | Dec 5<br>Jul 3                       | и   |
| Newspaper or other recycled paper   | 205.601(b) and (c)                                 | НВ          | N                  | 2017 TR  | Dec 5<br>Jun 19                      | и   |
| Plastic mulch and covers            | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority   | Dec 19,<br>Jan 2<br>Jul 17           | и   |
| Aqueous<br>potassium<br>silicate    | 205.601(e),<br>205.601(i)                          | DM          | N                  | 2014 TR  | Jan 2,<br>Feb 6<br>Jun 19            | u   |
| Elemental sulfur                    | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018. TR addendum sent to CS 4 20 18 | Dec 19,<br>Jan 2<br>Feb 20<br>Aug 21 | и   |
| Lime sulfur                         | 205.601(e)(6),<br>205.601(i)(6)                    | SE          | N                  | 2014 TR  | Dec 19<br>Jun 5                      | "   |
| Sucrose octanoate esters            | 205.601(e)(10)                                     | SB          | N                  | 2005 TR  | Dec 19<br>Jun 19                     | "   |
| Hydrated lime                       | 205.601(i)(4)                                      | DM          | N                  | 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide  | Jan 2,<br>Jun 19                     | u   |
| Liquid fish products                | 205.601(j)   | AB          | N                  | <u>1995 TAP</u> ; <u>2006 TR</u>   | Jan 16,<br>Aug 21                    | u   |
| Sulfurous Acid                      | 205.601(j)   | SE          | N                  | 2010 TAP; 2014 TR  | Dec 19<br>Jun 5                      | u   |
| Ethylene                            | 205.601(k)   | EO          | N                  | 2000 Supplemental TAP; 2007 TAP;<br>2011 Supplemental TR   | Dec 19<br>Jul 3                      | u   |

| Microcrystalline | 205.601(o) | SB | Υ | None. TR requested 07 28 17. In      | Dec 19, | u |
|------------------|------------|----|---|--------------------------------------|---------|---|
| cheesewax        |            |    |   | contracting. TR sent to CS 01 11 18. | Feb 20  |   |
|                  |            |    |   | TR found sufficient 02 20 18.        | Jun 19  |   |
| Potassium        | 205.602(e) | НВ | N | 1995 TAP. Low priority               | Jan 16  | u |
| chloride         |            |    |   |                                      | Jul 17  |   |
|                  |            |    |   |                                      |         |   |

- Spring meeting follow up
  - Liquid fish pH questions
  - Paper pots
  - o Potassium sulfate?
- Determine list of TR's for Sunset 2021 materials
- Assign dates to discuss/vote on fall sunset materials
- Determine direction to go with strengthening seed standards
- Natamycin (HB) Discuss proposal and vote
- Sodium Citrate (HB). Discuss proposal and vote
- Allyl Isothiocyanate (AITC) (JB) Discuss proposal
- Adjourn

#### **Discussion**

- Spring meeting follow up
  - Liquid fish pH questions. The NOP indicated that it has enough information from the Spring NOSB meeting review to move forward. The CS is exploring the need for an annotation to limit the use of fish exclusively harvested for fertilizers. In order to do this the CS may need to request a TR.
  - Paper pots. The group discussed the desire to clarify the use of paper pots. The NOSB anticipates that stakeholders will submit a petition and will follow up later this summer.
- Determine list of TR's for Sunset 2021 materials. See table below for TR requests.
- Assign dates to discuss/vote on fall sunset materials. See table above.
- **Determine direction to go with strengthening seed standards.** The CS will begin the discussion on strengthening seed standards the July 3 call.
- Natamycin (HB). The CS discussed adding this to the work agenda to classify it as non-synthetic and put it on 205.602 (prohibited). The Chair will send a request to the Exec team for discussion on May 18.
- Sodium Citrate (HB). Rescheduled for June 5
- Allyl Isothiocyanate (AITC) (JB). Deferred to next call
- The CS Chair talked with NOP about collaborating with Margaret McGrath, a plant pathologist at Cornell University, who works with the IR-4 group. IR-4 is a USDA/NIFA funded resource for supplying pest management tools for specialty crop growers. The Crops Subcommittee will invite her to the June 5 call.
- The meeting was adjourned

#### **Previous CS Notes**

Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

May 1, 2018 - cancelled

May 15, 2018

2021 sunsets - Determine need for TRs

Natamycin (HB) - Discuss proposal and vote Sodium Citrate (HB). Discuss proposal and vote Allyl Isothiocyanate (AITC) (JB) - Discuss proposal

June 5, 2018

Natamycin (HB) - Discuss proposal and vote Sodium Citrate (HB). Discuss proposal and vote Allyl Isothiocyanate (AITC) (JB) - Discuss proposal 2020 Sunsets:

> Lime sulfur (SE) - Discuss proposal and vote Sulfurous Acid (SE) - Discuss proposal and vote

June 19, 2018

2020 Sunsets:

Newspaper or other recycled paper (HB- Discuss proposal and vote)
Aqueous potassium silicate (DM) - Discuss proposal and vote
Hydrated lime (DM) - Discuss proposal and vote
Sucrose octanoate esters (SB) - Discuss proposal and vote
Microcrystalline cheesewax (SB) - Discuss proposal and vote

July 3, 2018

2020 Sunsets:

Sodium carbonate peroxyhydrate (EO) - Discuss proposal and vote Ethylene (EO) - Discuss proposal and vote

Strengthen and clarify the requirements for use of organic seed (NOP 5029) - discuss

July 17, 2018

2020 Sunsets:

Alcohols: Ethanol Isopropanol (JB) - Discuss proposal and vote Plastic mulch and covers (HB) - Discuss proposal and vote Potassium chloride (HB) - Discuss proposal and vote

August 7, 2018 August 21, 2018

2020 Sunsets:

Elemental sulfur (AB) - Discuss proposal and vote Liquid fish products (AB) - Discuss proposal and vote

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

| Fall 2018 Milestones                               | Target dates (tentative) |
|--|--------------------------|
| NOP - Publish FRN, Open public comment             | May 18, 2018             |
| NOSB Request for TRs for 2021 sunset materials     | Jun 6, 2018              |
| NOP - Draft Fall 2018NOSB meeting tentative agenda | Aug 9, 2018              |
| NOSB - Fall 2018 proposals due to NOP              | Aug 23, 2018             |
| NOP - Post proposals                               | On or before Sep 5, 2018 |
| Public comment closes                              | Oct 4, 2018              |

| Discuss/finalize work agendas on ES call    | Oct 12, 2018      |
|---|-------------------|
| NOP - Send compiled public comments to NOSB | Oct 8, 2018       |
| Public comment webinars                     | Oct 16 & 18, 2018 |
| Fall 2018 NOSB meeting - St. Paul, MN       | Oct 24-26, 2018   |

| 2021 Sunsets<br>TR Requests: July 20       | 18, Summary: S            | Spr 2019,    | TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019 |  |                         |   |  |  |  |
|--|---------------------------|--------------|--|--|-------------------------|---|--|--|--|
| Substance                                  | National<br>List §        | Con-<br>tact | TR re-<br>quest?   | Notes  | Scheduled,<br>Discussed | Meeting                                     |  |  |  |
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           | N  | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation    |                         | Summary<br>Spr 2019<br>Review:<br>Fall 2019 |  |  |  |
| Soaps, ammonium                            | 205.601(d)                | SB           | Y  | 1996 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | и   |  |  |  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           | Y  | 1995 TAP 2017 NOSB Recommendation CS Requested TR 05 15 18 |                         | u   |  |  |  |
| Pheromones                                 | 205.601(f)                | SE           | N  | 2012 TR<br>2017 NOSB Recommendation                        |                         | u   |  |  |  |
| Ferric phosphate                           | 205.601(h)                | SB           | N  | 2012 TR<br>2016 NOSB Recommendation                        |                         | и   |  |  |  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           | N  | 2015 TR<br>2017 NOSB Recommendation                        |                         | и   |  |  |  |
| Magnesium sulfate                          | 205.601(j)                | EO           | N  | 2011 TR<br>2017 NOSB Recommendation                        |                         | и   |  |  |  |
| Hydrogen chloride                          | 205.601(n)                | AB           | N  | 2014 Lmtd Scope TR 2016 NOSB Recommendation                |                         | и   |  |  |  |
| Ash from manure burning                    | 205.602(a)                | НВ           | N  | 2016 sunset rec 2017 NOSB Recommendation                   |                         | u   |  |  |  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           | N  | None 2017 NOSB Recommendation                              |                         | и   |  |  |  |

## National Organic Standards Board (NOSB) Crops Subcommittee (CS) Meeting Notes Tuesday April 3, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Dave Mortensen (DM);

Jesse Buie (JB)

Absent: Asa Bradman (AB); Sue Baird (SB)

Staff: Michelle Arsenault (MA)

| Petitioned Substance   | es           |                  |   |   |           |
|--|--------------|------------------|---|---|-----------|
| Substance  | Con-<br>tact | TR request?      | Notes   | Discussed,<br><mark>Voted</mark>                  | Meeting   |
| Polyoxin D Zinc salt 205.601 Petition Addendum #1 Petition Addendum #2 | JB           | Y                | Petition sent to CS 06 16 16. Petition suff/TR request due 08 16 16. Petition found sufficient 08 16 16. Discuss need for Lmt'd scope TR. CS requested Lmt'd scope TR 10 04 16. TR sent to Subcommittee on 12 19 17. Response due 02 20 18. TR found sufficient 02 20 18.   | Feb 6,<br>Feb 20                                  | Spr 2018  |
| Allyl Isothiocyanate (AITC) Petition (2016) 205.601                    | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6   | Fall 2018 |
| Sodium Citrate<br>205.601  | НВ           | Υ                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6<br>Apr 3 | Fall 2018 |

| At a contract of   |              |          |  |                      |                   |
|--|--------------|----------|--|----------------------|-------------------|
| <u>Natamycin</u>   | НВ           | Y        | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.  | Dec 5,<br>Mar 3      | Fall 2018         |
| Sulfur (as a<br>molluscicide)<br>205.601   | AB           | N        | Petition sent to CS 06 08 17. Petition suff/TR request due 09 05 17. Petition found sufficient 09 19 17. No TR request.  | Sep 19<br>Feb 20     | Spr 2018          |
| Ammonium Citrate<br>205.601  | EO/DM        | Y        | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21               | TBD               |
| Ammonium<br>Glycinate<br>205.601   | EO/DM        | Y        | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21               | TBD               |
| Calcium Acetate  | SB           | Y        | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18.  | Feb 6                | TBD               |
| Other Topics   |              |          |  |                      |                   |
|  |              |          |  |                      |                   |
| Project  | Con-<br>tact | Doc type | Notes*   | Discussed/<br>Voted  | Meeting           |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues            |              | Disc Doc | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. |                      | Meeting Fall 2018 |
| (Manure<br>treatments)<br>Anaerobic<br>Digestate - Food<br>Waste<br>205.601(j) and<br>other manure | tact         | , ,      | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting                                      | Voted Aug 1, Aug 15, |                   |

| Marine materials    | EO      | Disc doc | NOP approved request 01 12 16. TR        | Aug 15, | TBD       |
|---------------------|---------|----------|--|---------|-----------|
| (marine algae and   |         |          | request sent to NOP 02 05 16. TR sent to | Dec 5   |           |
| extracts) on the    |         |          | HS 08 10 16. Referred back to CS at Spr  |         |           |
| National List       |         |          | 2017 meeting. Moved to MS 03 16 18.      |         |           |
|                     |         |          |  |         |           |
| Field and           | JB, HB, | TBD      | On hold as per NOP Jan 2018.             | TBD     | TBD       |
| Greenhouse          | FT and  |          |  |         |           |
| Container           | EO      |          |  |         |           |
| Production          |         |          |  |         |           |
| Strengthen and      | НВ      | Proposal | Originated in MS. Referred back to CS at | TBD     | TBD       |
| clarify the         |         |          | Spr 2017 meeting. Referred back to CS at |         |           |
| requirements for    |         |          | Fall 2017 meeting.                       |         |           |
| use of organic seed |         |          |  |         |           |
| (NOP 5029)          |         |          |  |         |           |
| Research Priorities | All     | NA       | RPs due to MS Aug 2018                   | NA      | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |             |                    |   |                         |  |
|---|--|-------------|--------------------|---|-------------------------|--|
| Substance   |  | Con<br>tact | TR<br>requ<br>est? | Notes   | Scheduled,<br>Discussed | Meeting                                      |
| Alcohols:<br>Ethanol<br>Isopropanol                                       | 205.601(a)(1)(i),<br>205.601(a)(1)(ii) | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol | Feb 6                   | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate                                      | 205.601(a)                             | EO          | N                  | 2006 TAP; 2014 TR                                     | Dec 5                   | и  |
| Newspaper or other recycled paper   | 205.601(b) and (c)                     | НВ          | N                  | <u>2017 TR</u>  | Dec 5                   | и  |
| Plastic mulch and covers  | 205.601(b)                             | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority    | Dec 19, Jan 2           | и  |
| Aqueous<br>potassium<br>silicate  | 205.601(e),<br>205.601(i)              | DM          | N                  | 2014 TR   | Jan 2,<br>Feb 6         | и  |

| 205.601(e)(5),  | AB  | Υ  | 1995 TAP; 2017 TR for Livestock. TR   | Dec 19,   | u  |
|-----------------|---|--|---|---|--|
| 205.601(i)(10), |   |  | requested 07 28 17. In contracting.   | Jan 2   |  |
| 205.601(j)(2)   |   |  | TR sent to CS 01 10 18. TR  | Feb 20  |  |
| l               |   |  | sufficiency due 03 12 18. CS sent   |   |  |
| l               |   |  | additional questions to the TR  |   |  |
| l               |   |  | contractor. TR final draft expected   |   |  |
| l               |   |  | April 2018.   |   |  |
| 205.601(e)(6),  | SE  | N  | 2014 TR   | Dec 19  | u  |
| 205.601(i)(6)   |   |  |   |   |  |
| 205.601(e)(10)  | SB  | N  | 2005 TR   | Dec 19  | u  |
| 1               |   |  |   |   |  |
| 205.601(i)(4)   | DM  | N  | 1995 TAP; 2001 TAP; 2002 TR for   | Jan 2   | u  |
|                 |   |  | <u>Calcium Hydroxide</u>  |   |  |
| 205.601(j)      | AB  | N  | 1995 TAP; 2006 TR   | Jan 16,   | u  |
| l               |   |  |   |   |  |
| 205.601(j)      | SE  | N  | 2010 TAP; 2014 TR   | Dec 19  | u  |
|                 |   |  |   |   |  |
| 205.601(k)      | EO  | N  |   | Dec 19  | u  |
| l               |   |  | 2011 Supplemental TR  |   |  |
| 205.601(o)      | SB  | Υ  | None. TR requested 07 28 17. In   | Dec 19,   | u  |
| l               |   |  | contracting. TR sent to CS 01 11 18.  | Feb 20  |  |
| l               |   |  | TR found sufficient 02 20 18.   |   |  |
| 205.602(e)      | НВ  | N  | 1995 TAP. Low priority  | Jan 16  | u  |
|                 |   |  |   |   |  |
|                 | 205.601(i)(10),<br>205.601(j)(2)<br>205.601(e)(6),<br>205.601(i)(6)<br>205.601(e)(10)<br>205.601(j)<br>205.601(j)<br>205.601(k) | 205.601(i)(10),<br>205.601(j)(2)  205.601(e)(6),<br>205.601(i)(6)  205.601(e)(10) SB  205.601(j) AB  205.601(j) SE  205.601(k) EO  205.601(o) SB | 205.601(i)(10),<br>205.601(j)(2)  205.601(e)(6),<br>205.601(i)(6)  205.601(e)(10) SB N  205.601(j) AB N  205.601(j) SE N  205.601(j) SE N  205.601(k) EO N  205.601(o) SB Y | 205.601(i)(10), 205.601(j)(2)  requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018.  205.601(e)(6), 205.601(i)(6)  SE N 2005 TR  205.601(i)(4)  DM N 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide 205.601(j)  AB N 1995 TAP; 2006 TR  205.601(j)  SE N 2010 TAP; 2014 TR  205.601(k)  EO N 2000 Supplemental TAP; 2007 TAP; 2011 Supplemental TR  205.601(o)  SB Y None. TR requested 07 28 17. In contracting. TR sent to CS 01 11 18. TR found sufficient 02 20 18. | 205.601(i)(10), 205.601(j)(2)  TR sent to CS 01 10 18. TR Sufficiency due 03 12 18. CS sent additional questions to the TR contractor. TR final draft expected April 2018.  205.601(e)(6), 205.601(i)(6)  SE N 2014 TR  Dec 19  205.601(i)(4)  DM N 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide  205.601(j)  AB N 1995 TAP; 2006 TR  Jan 16,  205.601(j)  SE N 2010 TAP; 2014 TR  Dec 19  205.601(j)  SE N 2010 TAP; 2014 TR  Dec 19  205.601(j)  SE N 2010 TAP; 2014 TR  Dec 19  205.601(k)  EO N 2000 Supplemental TAP; 2007 TAP; 2011 Supplemental TR  205.601(o)  SB Y None. TR requested 07 28 17. In contracting. TR sent to CS 01 11 18. Feb 20 TR found sufficient 02 20 18. |

- Sodium Citrate (HB). Discuss and vote
- Assign leads to 2021 sunsets
- Natamycin (HB) Discuss proposal
- Adjourn

#### **Discussion**

- Sodium Citrate (HB). HB forwarded an OMRI newsletter that had an article about sodium citrate and "excipients". The group discussed the possibility of recommending that NOP publish guidance, or perhaps convene a task force. The CS requested additional information from the petitioner about the history of this material and why it is being petitioned for addition to the list. The lead will write a draft proposal and the group will discuss it on a future call.
- Assign leads to 2021 sunsets. See table below
- Natamycin (HB). Under the new materials' classification guidance, Natamycin is potentially classified as a natural. The CS will move forward with a classification motion, and if found to be a "natural" would not need to be added to the list. The CS is interested in submitting a petition to add Natamycin to 205.602, as a prohibited natural.
- The meeting was adjourned

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

March 6, 2018

Allyl Isothiocyanate (AITC) (JB) - TR sufficiency Sodium Citrate (HB) - Discuss proposal Natamycin (HB) - Discuss proposal

March 20, 2018 - cancelled call

April 3, 2018

Sodium Citrate (HB). Discuss and vote Assign leads to 2021 sunsets Natamycin (HB) - Discuss proposal Discuss public comment

April 17, 2018 - NOSB public comment webinar

May 1, 2018 - cancelled

May 15, 2018

Natamycin (HB) - Discuss proposal and vote Sodium Citrate (HB). Discuss proposal and vote Allyl Isothiocyanate (AITC) (JB) - Discuss proposal

June 5, 2018

2021 sunsets - Determine need for TRs

June 19, 2018

July 3, 2018

July 17, 2018

August 7, 2018

August 21, 2018

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

| Spring 2018 Milestones  | Target dates (tentative) |
|---|--------------------------|
| New NOSB member orientation                                       | TBD                      |
| NOSB - Spring 2018 proposals due to NOP                           | Feb 21, 2018             |
| NOP - Complete Spring 2018 NOSB meeting tentative agenda          | Mar 6, 2018              |
| NOP - Post proposals, Open public comment                         | Mar 6, 2018              |
| Discuss work agendas on ES call                                   | Mar 9, 2018              |
| Public comment closes   | Apr 4, 2018              |
| NOP - Send compiled public comments to NOSB                       | Apr 9, 2018              |
| Work agendas finalized on ES call (last call before fall meeting) | Apr 13, 2018             |
| Public comment webinar(s)   | Apr 17 & 19, 2018        |

| Spring 2018 NOSB meeting – Tucson, AZ | Apr 25-27, 2018 |
|---------------------------------------|-----------------|
|                                       |                 |

## 2021 Sunsets

| Substance                                  | National<br>List §        | Con-<br>tact | TR re-<br>quest? | Notes   | Scheduled,<br>Discussed | Meeting                                      |
|--|---------------------------|--------------|------------------|---|-------------------------|--|
| Hydrogen peroxide                          | 205.601(a),<br>205.601(i) | JB           |                  | 2015 Hydrogen Peroxide (Crops) 2017 NOSB Recommendation |                         | Summary:<br>Spr 2019<br>Review:<br>Fall 2019 |
| Soaps, ammonium                            | 205.601(d)                | SB           |                  | 1996 TAP 2017 NOSB Recommendation                       |                         | и  |
| Oils, horticultural<br>(Narrow range oils) | 205.601(e),<br>205.601(i) | SE           |                  | 1995 TAP 2017 NOSB Recommendation                       |                         | u  |
| Pheromones                                 | 205.601(f)                | SE           |                  | 2012 TR<br>2017 NOSB Recommendation                     |                         | и  |
| Ferric phosphate                           | 205.601(h)                | SB           |                  | 2012 TR<br>2016 NOSB Recommendation                     |                         | и  |
| Potassium<br>bicarbonate                   | 205.601(i)                | EO           |                  | 2015 TR<br>2017 NOSB Recommendation                     |                         | и  |
| Magnesium sulfate                          | 205.601(j)                | EO           |                  | 2011 TR<br>2017 NOSB Recommendation                     |                         | и  |
| Hydrogen chloride                          | 205.601(n)                | AB           |                  | 2014 Lmtd Scope TR 2016 NOSB Recommendation             |                         | и  |
| Ash from manure burning                    | 205.602(a)                | НВ           |                  | 2016 sunset rec<br>2017 NOSB Recommendation             |                         | и  |
| Sodium<br>fluoaluminate                    | 205.602(f)                | НВ           |                  | None.  2017 NOSB Recommendation                         |                         | и  |

## National Organic Standards Board (NOSB) Crops Subcommittee (CS) Meeting Notes Tuesday March 6, 2018 2:00 pm ET

Present: ); Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Harriet Behar (HB); Asa Bradman (AB); Dave

Mortensen (DM); Jesse Buie (JB)

Absent: Sue Baird (SB)

Staff: Michelle Arsenault (MA)

| Substance   | Con-<br>tact | TR request?      | Notes   | Discussed,<br>Voted                      | Meeting   |
|---|--------------|------------------|---|--|-----------|
| Polyoxin D Zinc salt<br>205.601<br>Petition Addendum<br>#1<br>Petition Addendum<br>#2 | JB           | Y                | Petition sent to CS 06 16 16. Petition suff/TR request due 08 16 16. Petition found sufficient 08 16 16. Discuss need for Lmt'd scope TR. CS requested Lmt'd scope TR 10 04 16. TR sent to Subcommittee on 12 19 17. Response due 02 20 18. TR found sufficient 02 20 18.   | Feb 6,<br>Feb 20                         | Spr 2018  |
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016) 205.601                             | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18. TR found sufficient 03 06 18  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)  | Mar 6                                    | Fall 2018 |
| Sodium Citrate<br>205.601   | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018<br>Mar 6 | Fall 2018 |

| Martina  |                 |                    |  |                      |                   |
|--|-----------------|--------------------|--|----------------------|-------------------|
| <u>Natamycin</u>   | НВ              | Y                  | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.  | Dec 5,<br>Mar 3      | Fall 2018         |
| Sulfur (as a<br>molluscicide)<br>205.601   | АВ              | N                  | Petition sent to CS 06 08 17. Petition suff/TR request due 09 05 17. Petition found sufficient 09 19 17. No TR request.  | Sep 19<br>Feb 20     | Spr 2018          |
| Ammonium Citrate<br>205.601  | EO/DM           | Y                  | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21               | TBD               |
| Ammonium<br>Glycinate<br>205.601   | EO/DM           | Y                  | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21               | TBD               |
| Calcium Acetate  | SB              | Y                  | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18.  | Feb 6                | TBD               |
| Other Topics   |                 |                    |  |                      |                   |
|  |                 |                    |  |                      |                   |
| Project  | Con-<br>tact    | Doc type           | Notes*   | Discussed/<br>Voted  | Meeting           |
| Project  (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues   |                 | Doc type  Disc Doc | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. |                      | Meeting Fall 2018 |
| (Manure<br>treatments)<br>Anaerobic<br>Digestate - Food<br>Waste<br>205.601(j) and<br>other manure | tact<br>EO/HB/J |                    | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting                                      | Voted Aug 1, Aug 15, |                   |

| Marine materials    | EO      | Disc doc | NOP approved request 01 12 16. TR        | Aug 15, | TBD       |
|---------------------|---------|----------|--|---------|-----------|
| (marine algae and   |         |          | request sent to NOP 02 05 16. TR sent to | Dec 5   |           |
| extracts) on the    |         |          | HS 08 10 16. Referred back to CS at Spr  |         |           |
| National List       |         |          | 2017 meeting. Moved to MS 03 16 18.      |         |           |
|                     |         |          |  |         |           |
| Field and           | JB, HB, | TBD      | On hold as per NOP Jan 2018.             | TBD     | TBD       |
| Greenhouse          | FT and  |          |  |         |           |
| Container           | EO      |          |  |         |           |
| Production          |         |          |  |         |           |
| Strengthen and      | НВ      | Proposal | Originated in MS. Referred back to CS at | TBD     | TBD       |
| clarify the         |         |          | Spr 2017 meeting. Referred back to CS at |         |           |
| requirements for    |         |          | Fall 2017 meeting.                       |         |           |
| use of organic seed |         |          |  |         |           |
| (NOP 5029)          |         |          |  |         |           |
| Research Priorities | All     | NA       | RPs due to MS Aug 2018                   | NA      | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |             |                    |   |                         |  |
|---|--|-------------|--------------------|---|-------------------------|--|
| Substance   |  | Con<br>tact | TR<br>requ<br>est? | Notes   | Scheduled,<br>Discussed | Meeting                                      |
| Alcohols:<br>Ethanol<br>Isopropanol                                       | 205.601(a)(1)(i),<br>205.601(a)(1)(ii) | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol | Feb 6                   | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate                                      | 205.601(a)                             | EO          | N                  | 2006 TAP; 2014 TR                                     | Dec 5                   | и  |
| Newspaper or other recycled paper   | 205.601(b) and (c)                     | НВ          | N                  | <u>2017 TR</u>  | Dec 5                   | и  |
| Plastic mulch and covers  | 205.601(b)                             | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority    | Dec 19, Jan 2           | и  |
| Aqueous<br>potassium<br>silicate  | 205.601(e),<br>205.601(i)              | DM          | N                  | 2014 TR   | Jan 2,<br>Feb 6         | и  |

| Elemental sulfur | 205.601(e)(5),  | AB | Υ | 1995 TAP; 2017 TR for Livestock. TR  | Dec 19, | u   |
|------------------|-----------------|----|---|--------------------------------------|---------|-----|
|                  | 205.601(i)(10), |    |   | requested 07 28 17. In contracting.  | Jan 2   |     |
|                  | 205.601(j)(2)   |    |   | TR sent to CS 01 10 18. TR           | Feb 20  |     |
|                  |                 |    |   | sufficiency due 03 12 18. CS sent    |         |     |
|                  |                 |    |   | additional questions to the TR       |         |     |
|                  |                 |    |   | contractor. TR final draft expected  |         |     |
|                  |                 |    |   | April 2018.                          |         |     |
| Lime sulfur      | 205.601(e)(6),  | SE | N | <u>2014 TR</u>                       | Dec 19  | u   |
|                  | 205.601(i)(6)   |    |   |                                      |         |     |
| Sucrose          | 205.601(e)(10)  | SB | N | 2005 TR                              | Dec 19  | u   |
| octanoate esters |                 |    |   |                                      |         |     |
| Hydrated lime    | 205.601(i)(4)   | DM | N | 1995 TAP; 2001 TAP; 2002 TR for      | Jan 2   | u u |
|                  |                 |    |   | <u>Calcium Hydroxide</u>             |         |     |
| Liquid fish      | 205.601(j)      | AB | N | 1995 TAP; 2006 TR                    | Jan 16, | u   |
| products         |                 |    |   |                                      |         |     |
| Sulfurous Acid   | 205.601(j)      | SE | N | 2010 TAP; 2014 TR                    | Dec 19  | u   |
|                  |                 |    |   |                                      |         |     |
| Ethylene         | 205.601(k)      | EO | N | 2000 Supplemental TAP; 2007 TAP;     | Dec 19  | u   |
|                  |                 |    |   | 2011 Supplemental TR                 |         |     |
| Microcrystalline | 205.601(o)      | SB | Υ | None. TR requested 07 28 17. In      | Dec 19, | "   |
| cheesewax        |                 |    |   | contracting. TR sent to CS 01 11 18. | Feb 20  |     |
|                  |                 |    |   | TR found sufficient 02 20 18.        |         |     |
| Potassium        | 205.602(e)      | НВ | N | 1995 TAP. Low priority               | Jan 16  | u   |
| chloride         |                 |    |   |                                      |         |     |

- Approve notes from February 20 call.
- Allyl Isothiocyanate (AITC) (JB) TR sufficiency
- Sodium Citrate (HB) Discuss proposal
- Natamycin (HB) Discuss proposal
- Other items
  - Marine materials update
  - o Strengthen and clarify the requirements for use of organic seed (NOP 5029) update
- Assign leads to 2021 sunsets
- Adjourn

#### Discussion

- **Notes from** February 20 were approved with a correction to the entry about marine materials.
- Potassium chloride was reassigned to HB.
- Allyl Isothiocyanate (AITC) (JB). The Subcommittee had requested a limited scope TR with specific
  questions, and the CS found it sufficient. The lead will begin drafting a proposal and the group will
  discuss it on a later call.
- **Sodium Citrate (HB).** The lead will make some additional edits to the draft proposal based on feedback during the discussion, and bring it forth for a vote on a later call.

• Natamycin (HB). The group discussed classification and how to move forward with the proposal. The lead invited feedback. Several members will reach out to other members and stakeholders to for additional feedback, and discuss it during the next call. The NOP will provide feedback on the next call about the process, if the substance is classified as nonsynthetic.

#### Other items

- Marine materials update. The Crops and Handling proposals on marine materials will be combined and sent to the Materials Subcommittee for completion, and will be submitted as a proposal for the Fall NOSB meeting. The Crops version has been completed, and the lead will work on completing the Handling version and will send it to Materials. The Subcommittee asked NOP for options to post this document ahead of that meeting for public viewing and feedback. MA will ask if posting to the docket is still an option.
- Strengthen and clarify the requirements for use of organic seed (NOP 5029) update.
   Deferred.
- Assign leads to 2021 sunsets. Deferred to April 3 call.
- Other. The CS cancelled the March 20 call.
- The meeting was adjourned

#### **Previous CS Notes**

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

February 20, 2018

2020 sunset: Microcrystalline cheesewax (SB) - TR sufficiency

2020 sunset: Elemental sulfur (AB) - TR sufficiency

Polyoxin D Zinc salt (JB) - Review petition addendum/TR sufficiency

Discussion of future options for container proposals (HB)

#### March 6, 2018

Allyl Isothiocyanate (AITC) (JB) - TR sufficiency

Sodium Citrate (HB) - Discuss proposal

Natamycin (HB) - Discuss proposal

March 20, 2018 - cancelled call

April 3, 2018

Sodium Citrate (HB). Discuss and vote

Assign leads to 2021 sunsets

Natamycin (HB) - Discuss proposal

Discuss public comment

April 17, 2018 - NOSB public comment webinar

May 1, 2018

Allyl Isothiocyanate (AITC) (JB) - Discuss proposal

May 15, 2018

June 5, 2018

June 19, 2018

July 3, 2018

July 17, 2018

August 7, 2018

August 21, 2018

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

| Spring 2018 Milestones  | Target dates (tentative) |
|---|--------------------------|
| New NOSB member orientation                                       | TBD                      |
| NOSB - Spring 2018 proposals due to NOP                           | Feb 21, 2018             |
| NOP - Complete Spring 2018 NOSB meeting tentative agenda          | Mar 6, 2018              |
| NOP - Post proposals, Open public comment                         | Mar 6, 2018              |
| Discuss work agendas on ES call                                   | Mar 9, 2018              |
| Public comment closes   | Apr 4, 2018              |
| NOP - Send compiled public comments to NOSB                       | Apr 9, 2018              |
| Work agendas finalized on ES call (last call before fall meeting) | Apr 13, 2018             |
| Public comment webinar(s)   | Apr 17 & 19, 2018        |
| Spring 2018 NOSB meeting – Tucson, AZ                             | Apr 25-27, 2018          |

| Substance           | National    | Con- | TR re- | Notes                          | Scheduled, | Meeting   |
|---------------------|-------------|------|--------|--------------------------------|------------|-----------|
|                     | List §      | tact | quest? |                                | Discussed  |           |
| Hydrogen peroxide   | 205.601(a), |      |        | 2015 Hydrogen Peroxide (Crops) |            | Summary   |
|                     | 205.601(i)  |      |        | 2017 NOSB Recommendation       |            | Spr 2019  |
|                     |             |      |        |                                |            | Review:   |
|                     |             |      |        |                                |            | Fall 2019 |
| Soaps, ammonium     | 205.601(d)  |      |        | 1996 TAP                       |            | "         |
|                     |             |      |        | 2017 NOSB Recommendation       |            |           |
| Oils, horticultural | 205.601(e), | SE   |        | 1995 TAP                       |            | u         |
| (Narrow range oils) | 205.601(i)  |      |        | 2017 NOSB Recommendation       |            |           |
| Pheromones          | 205.601(f)  | SE   |        | 2012 TR                        |            | u         |
|                     |             |      |        | 2017 NOSB Recommendation       |            |           |
| Ferric phosphate    | 205.601(h)  |      |        | 2012 TR                        |            | и         |
|                     |             |      |        | 2016 NOSB Recommendation       |            |           |
| Potassium           | 205.601(i)  |      |        | 2015 TR                        |            | u         |
| bicarbonate         |             |      |        | 2017 NOSB Recommendation       |            |           |
| Magnesium sulfate   | 205.601(j)  |      |        | <u>2011 TR</u>                 |            | и         |
|                     |             |      |        | 2017 NOSB Recommendation       |            |           |

| Lignin sulfonate        | <del>205.601(I)</del> | 2011 TR 2017 NOSB Recommendation (Removed from 205.601(I) as a floating agent: 82 FR 31241) | u |
|-------------------------|-----------------------|---|---|
| Hydrogen chloride       | 205.601(n)            | 2014 Lmtd Scope TR 2016 NOSB Recommendation   | и |
| Ash from manure burning | 205.602(a)            | 2016 sunset rec 2017 NOSB Recommendation  | u |
| Sodium<br>fluoaluminate | 205.602(f)            | None. 2017 NOSB Recommendation  | и |

## National Organic Standards Board (NOSB) Crops Subcommittee (CS) Meeting Notes Tuesday February 20, 2018 2:00 pm ET

Present: Emily Oakley, Vice Chair (EO); Sue Baird (SB); Harriet Behar (HB); Asa Bradman (AB); Jesse Buie

(JB); Tom Chapman (TC) - observer

**Absent:** Steve Ela, Chair (SE); Dave Mortensen (DM)

Staff: Michelle Arsenault (MA)

| Petitioned Substance   | es           |                  |   |                                  |           |
|--|--------------|------------------|---|----------------------------------|-----------|
| Substance  | Con-<br>tact | TR request?      | Notes   | Discussed,<br><mark>Voted</mark> | Meeting   |
| Polyoxin D Zinc salt 205.601 Petition Addendum #1 Petition Addendum #2 | JB           | Y                | Petition sent to CS 06 16 16. Petition suff/TR request due 08 16 16. Petition found sufficient 08 16 16. Discuss need for Lmt'd scope TR. CS requested Lmt'd scope TR 10 04 16. TR sent to Subcommittee on 12 19 17. Response due 02 20 18. TR found sufficient 02 20 18.   | Feb 6,<br>Feb 20                 | Spr 2018  |
| Allyl Isothiocyanate (AITC) Petition (2016) 205.601                    | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development. Expected Feb/Mar 2018. Lmtd scope TR sent to CS 02 16 18. Response due 04 18 18.  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)   | Mar 6                            | Fall 2018 |
| Sodium Citrate<br>205.601  | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018  | Fall 2018 |

| Makasas str  |                 |                    |  |                      |                   |
|--|-----------------|--------------------|--|----------------------|-------------------|
| <u>Natamycin</u>   | НВ              | Y                  | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.  | Dec 5                | Fall 2018         |
| Sulfur (as a<br>molluscicide)<br>205.601   | AB              | N                  | Petition sent to CS 06 08 17. Petition suff/TR request due 09 05 17. Petition found sufficient 09 19 17. No TR request.  | Sep 19<br>Feb 20     | Spr 2018          |
| Ammonium Citrate<br>205.601  | EO/DM           | Y                  | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21               | TBD               |
| Ammonium<br>Glycinate<br>205.601   | EO/DM           | Y                  | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21               | TBD               |
| Calcium Acetate  | SB              | Y                  | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR with specific questions 02 06 18.  | Feb 6                | TBD               |
| Other Topics   |                 |                    |  |                      |                   |
|  |                 |                    |  |                      |                   |
| Project  | Con-<br>tact    | Doc type           | Notes*   | Discussed/<br>Voted  | Meeting           |
| Project  (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues   |                 | Doc type  Disc Doc | Notes*  Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. |                      | Meeting Fall 2018 |
| (Manure<br>treatments)<br>Anaerobic<br>Digestate - Food<br>Waste<br>205.601(j) and<br>other manure | tact<br>EO/HB/J |                    | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting  | Voted Aug 1, Aug 15, | _                 |

| Marine materials    | EO      | Disc doc | NOP approved request 01 12 16. TR        | Aug 15, | TBD       |
|---------------------|---------|----------|--|---------|-----------|
| (marine algae and   |         |          | request sent to NOP 02 05 16. TR sent to | Dec 5   |           |
| extracts) on the    |         |          | HS 08 10 16. Returned to CS at Spr 2017  |         |           |
| National List       |         |          | NOSB meeting. Referred back to CS at Spr |         |           |
|                     |         |          | 2017 meeting                             |         |           |
| Field and           | JB, HB, | TBD      | On hold as per NOP Jan 2018.             | Feb 20  | TBD       |
| Greenhouse          | FT and  |          |  |         |           |
| Container           | EO      |          |  |         |           |
| Production          |         |          |  |         |           |
| Strengthen and      | НВ      | Proposal | Originated in MS. Referred back to CS at |         | TBD       |
| clarify the         |         |          | Spr 2017 meeting. Referred back to CS at |         |           |
| requirements for    |         |          | Fall 2017 meeting.                       |         |           |
| use of organic seed |         |          |  |         |           |
| (NOP 5029)          |         |          |  |         |           |
| Research Priorities | All     | NA       | RPs due to MS Aug 2018                   | NA      | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |    |   |   |                 |  |
|---|--|----|---|---|-----------------|--|
|   |  |    |   |   |                 |  |
| Alcohols:<br>Ethanol<br>Isopropanol                                       | 205.601(a)(1)(i),<br>205.601(a)(1)(ii) | JB | N | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol | Feb 6           | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate                                      | 205.601(a)                             | EO | N | 2006 TAP; 2014 TR                                     | Dec 5           | и  |
| Newspaper or other recycled paper   | 205.601(b) and (c)                     | НВ | N | <u>2017 TR</u>  | Dec 5           | и  |
| Plastic mulch and covers  | 205.601(b)                             | НВ | N | 1995 TAP: TR for biodegradable mulch. Low priority    | Dec 19, Jan 2   | и  |
| Aqueous<br>potassium<br>silicate  | 205.601(e),<br>205.601(i)              | DM | N | <u>2014 TR</u>  | Jan 2,<br>Feb 6 | и  |

| 205.601(e)(5),  | AB  | Υ   | 1995 TAP; 2017 TR for Livestock. TR  | Dec 19,                         | u   |
|-----------------|---|---|--|---------------------------------|---|
| 205.601(i)(10), |   |   | requested 07 28 17. In contracting.  | Jan 2                           |   |
| 205.601(j)(2)   |   |   | TR sent to CS 01 10 18. TR   | Feb 20                          |   |
|                 |   |   | sufficiency due 03 12 18. CS sent  |                                 |   |
|                 |   |   | additional questions to the TR   |                                 |   |
|                 |   |   | contractor.  |                                 |   |
| 205.601(e)(6),  | SE  | N   | 2014 TR  | Dec 19                          | u   |
| 205.601(i)(6)   |   |   |  |                                 |   |
| 205.601(e)(10)  | SB  | N   | 2005 TR  | Dec 19                          | u   |
|                 |   |   |  |                                 |   |
| 205.601(i)(4)   | DM  | N   | 1995 TAP; 2001 TAP; 2002 TR for  | Jan 2                           | u   |
|                 |   |   | <u>Calcium Hydroxide</u>   |                                 |   |
| 205.601(j)      | AB  | N   | 1995 TAP; 2006 TR  | Jan 16 <i>,</i>                 | u   |
| 205.601(j)      | SE  | N   | 2010 TAP; 2014 TR  | Dec 19                          | и   |
| 205.601(k)      | EO  | N   | 2000 Supplemental TAP; 2007 TAP;   | Dec 19                          | u   |
|                 |   |   | 2011 Supplemental TR   |                                 |   |
| 205.601(o)      | SB  | Υ   | None. TR requested 07 28 17. In  | Dec 19,                         | u   |
|                 |   |   | contracting. TR sent to CS 01 11 18.   | Feb 20                          |   |
|                 |   |   | TR sufficiency due 03 13 18.   |                                 |   |
| 205.602(e)      | JM  | N   | 1995 TAP. Low priority   | Jan 16                          | u   |
|                 |   |   |  |                                 |   |
|                 | 205.601(i)(10),<br>205.601(j)(2)<br>205.601(e)(6),<br>205.601(i)(6)<br>205.601(e)(10)<br>205.601(j)<br>205.601(j)<br>205.601(k) | 205.601(i)(10),<br>205.601(j)(2)  205.601(e)(6),<br>205.601(i)(6)  205.601(e)(10)  SB  205.601(j)  AB  205.601(j)  SE  205.601(k)  EO  205.601(o)  SB | 205.601(i)(10),<br>205.601(j)(2)  205.601(e)(6),<br>205.601(i)(6)  205.601(i)(4)  DM N  205.601(j)  AB N  205.601(j)  SE N  205.601(j)  SE N  205.601(j)  SE N | 205.601(i)(10),   205.601(j)(2) | 205.601(i)(10),<br>205.601(j)(2)       requested 07 28 17. In contracting.<br>TR sent to CS 01 10 18. TR<br>sufficiency due 03 12 18. CS sent<br>additional questions to the TR<br>contractor.       Dec 19         205.601(e)(6),<br>205.601(i)(6)       SE       N       2014 TR       Dec 19         205.601(e)(10)       SB       N       2005 TR       Dec 19         205.601(i)(4)       DM       N       1995 TAP; 2001 TAP; 2002 TR for<br>Calcium Hydroxide       Jan 2         205.601(j)       AB       N       1995 TAP; 2006 TR       Jan 16,         205.601(j)       SE       N       2010 TAP; 2014 TR       Dec 19         205.601(k)       EO       N       2000 Supplemental TAP; 2007 TAP;<br>2011 Supplemental TR       Dec 19         205.601(o)       SB       Y       None. TR requested 07 28 17. In<br>contracting. TR sent to CS 01 11 18.<br>TR sufficiency due 03 13 18.       Dec 19,<br>Feb 20 |

- Approve notes from February 6 call.
- 2020 sunset: Microcrystalline cheesewax (SB) TR sufficiency
- 2020 sunset: Elemental sulfur (AB) TR sufficiency
- Polyoxin D Zinc salt (JB) Review petition addendum/TR sufficiency
- Discussion of marine materials (EO)
- Discussion of future options for container proposals (HB)
- Other items
- Adjourn

#### **Discussion**

- Notes from February 6 were approved by the Subcommittee.
- Update on work agenda for spring. The NOSB Chair updated the members about the work agenda, and which items will be presented at the spring 2018 meeting, and which will be deferred to the fall meeting and beyond.
- **2020 sunset: Microcrystalline cheesewax (SB).** The CS Chair will communicate to the NOP that the Crops Subcommittee found the TR for Microcrystalline cheesewax sufficient. The lead will add an additional question about International Standards and resend the document to the NOP.
- **2020 sunset: Elemental sulfur (AB).** The CS will send a couple of questions to the TR contractor for additional information.

• **Polyoxin D Zinc salt (JB).** The Crops Chair will relay to the NOP that the Subcommittee reviewed the additional information that was provided by the petitioner, and found the TR for Polyoxin D Zinc salt sufficient. Several members will continue to work on the format of the proposal, based on the discussion. The CS will vote, and leave the vote open for absent members.

Motion to classify Polyoxin D Zinc salt as petitioned as (synthetic

Motion by: JB Seconded by: EO

Additional discussion: none

Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Motion to add Polyoxin D Zinc salt as petitioned at §205.601

Motion by: JB Seconded by: SB

Additional discussion: none

Yes: 3 No: 1 Abstain: 2 Absent: 1 Recuse: 0

ABS note: Two absent members cast votes via email, and votes were recorded above.

- Discussion of future options for container proposals (HB). Not discussed.
- Discussion of marine materials (EO). The Crops and Handling Subcommittees will combine the
  proposals on Marine materials, and send them to the Materials Subcommittee for further
  development. The Materials Subcommittee will bring the proposal to the Fall 2018 NOSB meeting.
- Sulfur (as a molluscicide) petitioned. The CS moved to a vote on the proposal, as noted below.

Motion to add sulfur as petitioned at §205.601

Motion by: AB Seconded by: HB

Additional discussion: Sulfur is already allowed for various uses, and the pelletized form, as petitioned here, is noted to be less likely to expose human as compared to dust form.

Yes: 5 No: 0 Abstain: 0 Absent: 2 Recuse: 0

- Other items. None
- The meeting was adjourned

### **Previous CS Notes**

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

February 6, 2018

2020 sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss review

Polyoxin D Zinc salt (JB) - TR sufficiency

2020 sunset: Aqueous potassium silicate (DM) - Discuss review

Calcium Acetate (SB) - petition sufficiency/TR request

2020 sunset: Microcrystalline cheesewax (SB) - TR sufficiency

2020 sunset: Elemental sulfur TR sufficiency (AB)

Discussion of future options for container proposals (HB)

## February 20, 2018

2020 sunset: Microcrystalline cheesewax (SB) - TR sufficiency

2020 sunset: Elemental sulfur (AB) - TR sufficiency

Polyoxin D Zinc salt (JB) - Review petition addendum/TR sufficiency

Discussion of future options for container proposals (HB)

## March 6, 2018

Allyl Isothiocyanate (AITC) (JB) - TR sufficiency

Sodium Citrate (HB) - Discuss proposal Natamycin (HB) - Discuss proposal

March 20, 2018

April 3, 2018

April 17, 2018

May 1, 2018

May 15, 2018

June 5, 2018

June 19, 2018

July 3, 2018

July 17, 2018

August 7, 2018

August 21, 2018

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

December 18, 2018

| Spring 2018 Milestones  | Target dates (tentative) |
|---|--------------------------|
| New NOSB member orientation                                       | TBD                      |
| NOSB - Spring 2018 proposals due to NOP                           | Feb 21, 2018             |
| NOP - Complete Spring 2018 NOSB meeting tentative agenda          | Mar 6, 2018              |
| NOP - Post proposals, Open public comment                         | Mar 6, 2018              |
| Discuss work agendas on ES call                                   | Mar 9, 2018              |
| Public comment closes   | Apr 4, 2018              |
| NOP - Send compiled public comments to NOSB                       | Apr 9, 2018              |
| Work agendas finalized on ES call (last call before fall meeting) | Apr 13, 2018             |
| Public comment webinar(s)   | Apr 17 & 19, 2018        |
| Spring 2018 NOSB meeting – Tucson, AZ                             | Apr 25-27, 2018          |

| 2021 Sunsets TR Requests: July 2018, Summary: Spr 2019, Review: Fall 2019 |                    |              |                  |       |                         |         |  |  |
|---|--------------------|--------------|------------------|-------|-------------------------|---------|--|--|
| Substance   | National<br>List § | Con-<br>tact | TR re-<br>quest? | Notes | Scheduled,<br>Discussed | Meeting |  |  |

| Hydrogen peroxide   | 205.601(a),           | 2015 Hydrogen Peroxide (Crops) | Summary:  |
|---------------------|-----------------------|--------------------------------|-----------|
|                     | 205.601(i)            | 2017 NOSB Recommendation       | Spr 2019  |
|                     |                       |                                | Review:   |
|                     |                       |                                | Fall 2019 |
| Soaps, ammonium     | 205.601(d)            | 1996 TAP                       | u         |
|                     |                       | 2017 NOSB Recommendation       |           |
| Oils, horticultural | 205.601(e),           | 1995 TAP                       | u u       |
| (Narrow range oils) | 205.601(i)            | 2017 NOSB Recommendation       |           |
| Pheromones          | 205.601(f)            | 2012 TR                        | u         |
|                     |                       | 2017 NOSB Recommendation       |           |
| Ferric phosphate    | 205.601(h)            | 2012 TR                        | u         |
|                     |                       | 2016 NOSB Recommendation       |           |
| Potassium           | 205.601(i)            | 2015 TR                        | и         |
| bicarbonate         |                       | 2017 NOSB Recommendation       |           |
| Magnesium sulfate   | 205.601(j)            | 2011 TR                        | "         |
|                     |                       | 2017 NOSB Recommendation       |           |
| Lignin sulfonate    | <del>205.601(I)</del> | 2011 TR                        | и         |
|                     |                       | 2017 NOSB Recommendation       |           |
|                     |                       | (Removed from 205.601(I) as a  |           |
|                     |                       | floating agent: 82 FR 31241)   |           |
| Hydrogen chloride   | 205.601(n)            | 2014 Lmtd Scope TR             | u         |
|                     |                       | 2016 NOSB Recommendation       |           |
| Ash from manure     | 205.602(a)            | 2016 sunset rec                | и         |
| burning             |                       | 2017 NOSB Recommendation       |           |
| Sodium              | 205.602(f)            | None.                          | u         |
| fluoaluminate       |                       | 2017 NOSB Recommendation       |           |
|                     |                       |                                |           |

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (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) Crops Subcommittee (CS) Meeting Notes Tuesday February 6, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Emily Oakley, Vice Chair (EO); Sue Baird (SB); Harriet Behar (HB); Asa

Bradman (AB); Jesse Buie (JB); Dave Mortensen (DM)

Absent: Joelle Mosso (JM)
Staff: Michelle Arsenault (MA)

## **Work Agenda**

| Substance   | Con-<br>tact | TR request?      | Notes   | Discussed,<br>Voted             | Meeting   |
|---|--------------|------------------|---|---------------------------------|-----------|
| Polyoxin D Zinc salt<br>205.601                           | JB           | Y                | Petition sent to CS 06 16 16. Petition suff/TR request due 08 16 16. Petition found sufficient 08 16 16. Discuss need for Lmt'd scope TR. CS requested Lmt'd scope TR 10 04 16. TR sent to Subcommittee on 12 19 17. Response due 02 20 18.   | Feb 6,<br>Feb 20                | Spr 2018  |
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016) 205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development  Expected Feb/Mar 2018.  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)   | Mar 6                           | Spr 2018  |
| Sodium Citrate<br>205.601                                 | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015).  TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18. TR found sufficient 02 06 18. | Sep 19,<br>2017,<br>Feb 6, 2018 | Fall 2018 |

| Natamycin  | НВ              | Y                  | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.  | Dec 5                         | Spr 2018         |
|--|-----------------|--------------------|--|-------------------------------|------------------|
| Sulfur (as a molluscicide) 205.601   | AB              | N                  | Petition sent to CS 06 08 17. Petition suff/TR request due 09 05 17. Petition found sufficient 09 19 17. No TR request.  | Sep 19<br><mark>Jan 16</mark> | Spr 2018         |
| Ammonium Citrate<br>205.601  | EO/DM           | Y                  | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21                        | TBD              |
| Ammonium<br>Glycinate<br>205.601   | EO/DM           | Y                  | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21                        | TBD              |
| Calcium Acetate<br>(CAS #62544)  | SB              |                    | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17. Petition found suff 02 06 18. CS requested TR 02 06 18.  | Feb 6                         | TBD              |
| Other Topics   |                 |                    |  |                               |                  |
|  |                 |                    |  |                               |                  |
| Project  | Con-<br>tact    | Doc type           | Notes*   | Discussed/<br>Voted           | Meeting          |
| Project  (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues   |                 | Doc type  Disc Doc | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. |                               | Meeting Spr 2018 |
| (Manure<br>treatments)<br>Anaerobic<br>Digestate - Food<br>Waste<br>205.601(j) and<br>other manure | tact<br>EO/HB/J |                    | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting                                      | Voted Aug 1, Aug 15,          | _                |

| Marine materials           | EO      | Disc doc | NOP approved request 01 12 16. TR   | Aug 15, | TBD       |
|----------------------------|---------|----------|---|---------|-----------|
| (marine algae and          |         |          | request sent to NOP 02 05 16. TR sent to  | Dec 5   |           |
| extracts) on the           |         |          | HS 08 10 16. Returned to CS at Spr 2017   |         |           |
| National List              |         |          | NOSB meeting. Referred back to CS at Spr  |         |           |
|                            |         |          | 2017 meeting  |         |           |
| Field and                  | JB, HB, | TBD      | On hold as per NOP Jan 2018.  | Feb 20  | Summary   |
| Greenhouse                 | FT and  |          |   |         | of        |
| Container                  | EO      |          |   |         | comments  |
| Production                 |         |          |   |         | Spr 2018  |
| Strengthen and clarify the | НВ      | Proposal | Originated in MS. Referred back to CS at Spr 2017 meeting. Referred back to CS at | TBD     | TBD       |
| requirements for           |         |          | Fall 2017 meeting.  |         |           |
| use of organic seed        |         |          | Tan 2017 meeting.   |         |           |
| (NOP 5029)                 |         |          |   |         |           |
| Research Priorities        | All     | NA       | RPs due to MS Aug 2018  | NA      | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets   | 2020 Sunsets                                       |             |                    |   |                            |  |  |  |
|--|--|-------------|--------------------|---|----------------------------|--|--|--|
| TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |             |                    |   |                            |  |  |  |
| Substance  |  | Con<br>tact | TR<br>requ<br>est? | Notes   | Scheduled,<br>Discussed    | Meeting                                      |  |  |
| Alcohols:<br>Ethanol<br>Isopropanol                          | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol   | Feb 6                      | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |  |  |
| Sodium<br>carbonate<br>peroxyhydrate                         | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR   | Dec 5                      | и  |  |  |
| Newspaper or other recycled paper                            | 205.601(b) and (c)                                 | НВ          | N                  | <u>2017 TR</u>  | Dec 5                      | и  |  |  |
| Plastic mulch and covers                                     | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority  | Dec 19, Jan 2              | ш  |  |  |
| Aqueous<br>potassium<br>silicate                             | 205.601(e),<br>205.601(i)                          | DM          | N                  | 2014 TR   | Jan 2,<br>Feb 6            | u  |  |  |
| Elemental sulfur   | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18 | Dec 19,<br>Jan 2<br>Feb 20 | и  |  |  |

| Lime sulfur                   | 205.601(e)(6),<br>205.601(i)(6) | SE | N | 2014 TR  | Dec 19            | и |
|-------------------------------|---------------------------------|----|---|--|-------------------|---|
| Sucrose octanoate esters      | 205.601(e)(10)                  | SB | N | 2005 TR  | Dec 19            | и |
| Hydrated lime                 | 205.601(i)(4)                   | DM | N | 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide  | Jan 2             | и |
| Liquid fish products          | 205.601(j)                      | AB | N | 1995 TAP; 2006 TR  | Jan 16,           | и |
| Sulfurous Acid                | 205.601(j)                      | SE | N | 2010 TAP; 2014 TR  | Dec 19            | u |
| Ethylene                      | 205.601(k)                      | EO | N | 2000 Supplemental TAP; 2007 TAP;<br>2011 Supplemental TR   | Dec 19            | и |
| Microcrystalline<br>cheesewax | 205.601(o)                      | SB | Y | None. TR requested 07 28 17. In contracting. TR sent to CS 01 11 18.  TR sufficiency due 03 13 18. | Dec 19,<br>Feb 20 | и |
| Potassium<br>chloride         | 205.602(e)                      | JM | N | 1995 TAP. Low priority   | Jan 16            | и |

- Approve notes from January 16 call.
- 2020 sunset: Alcohols: Ethanol Isopropanol (JB) Discuss review
- Polyoxin D Zinc salt (JB) TR sufficiency
- 2020 sunset: Aqueous potassium silicate (DM) Discuss review
- Calcium Acetate (SB) petition sufficiency/TR request
- 2020 sunset: Microcrystalline cheesewax (SB) TR sufficiency
- 2020 sunset: Elemental sulfur TR sufficiency (AB)
- Discussion of future options for container proposals (HB)
- Sodium Citrate (HB)
- Adjourn

#### Discussion

- Notes from January 16, 2018 were approved by the Subcommittee.
- **2020 sunset: Alcohols: Ethanol and Isopropanol (JB).** The CS will submit the review to the NOP for the April 2018 meeting.
- **Polyoxin D Zinc salt (JB).** The HS will defer the TR sufficiency and discuss this again on the next call, as they are expecting an addendum with additional information.
- 2020 sunset: Aqueous potassium silicate (DM). The lead will add additional questions, as discussed by the group, to the review document, and the CS will submit the review to the NOP for the April 2018 meeting.
- Calcium Acetate (SB). The CS accepted the petition as sufficient and will send a request to NOP for a TR. The CS is also seeking feedback from NOP regarding Confidential Business information (CBI) mentioned in the petition, as well as verification that the review is for the stated uses only.
- 2020 sunset: Microcrystalline cheesewax (SB). Deferred to the next call
- 2020 sunset: Elemental sulfur TR sufficiency (AB). Deferred to the next call
- Discussion of future options for container proposals (HB). Deferred to the next call

- Sodium Citrate (HB). The group discussed the substance and found the TR sufficient. The Chair will send the NOP confirmation of sufficiency. The CS will complete a proposal for the Fall 2018 meeting.
- Other items.
  - The Crops proposal for marine materials is nearly complete, and the lead will contact NOP with an update on its status. The Chair will discuss this on the next Executive call.
  - The Field and Greenhouse Container Production document is being put on hold. The lead discussed re-scoping the project, and will discuss it on a future call.
- The meeting was adjourned

### **Previous CS Notes**

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

January 16, 2018

Calcium Acetate (SB) - petition sufficiency/TR request

Polyoxin D Zinc salt (JB) - TR sufficiency

Sulfur (as a molluscicide) (AB) - Discuss proposal.

2020 sunset: Hydrated Lime (DM) - Discuss review

2020 sunset: Liquid fish products (AB) - Discuss review

2020 sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss review

2020 sunset: Potassium chloride (JM) - Discuss review

Discussion of future options for container proposals

### February 6, 2018

2020 sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss review

Polyoxin D Zinc salt (JB) - TR sufficiency

2020 sunset: Aqueous potassium silicate (DM) - Discuss review

Calcium Acetate (SB) - petition sufficiency/TR request

2020 sunset: Microcrystalline cheesewax (SB) - TR sufficiency

2020 sunset: Elemental sulfur TR sufficiency (AB)

Discussion of future options for container proposals (HB)

### February 20, 2018

2020 sunset: Microcrystalline cheesewax (SB) - TR sufficiency

2020 sunset: Elemental sulfur (AB) - TR sufficiency

Polyoxin D Zinc salt (JB) - Review petition addendum/TR sufficiency

Discussion of future options for container proposals (HB)

### March 6, 2018

Allyl Isothiocyanate (AITC) - TR sufficiency (JB)

March 20, 2018

April 3, 2018

April 17, 2018

May 1, 2018

May 15, 2018

June 5, 2018

June 19, 2018

July 3, 2018

July 17, 2018

August 7, 2018

August 21, 2018

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018 November 20, 2018 December 4, 2018 December 18, 2018

| Spring 2018 Milestones  | Target dates (tentative) |
|---|--------------------------|
| New NOSB member orientation                                       | TBD                      |
| NOSB - Spring 2018 proposals due to NOP                           | Feb 21, 2018             |
| NOP - Complete Spring 2018 NOSB meeting tentative agenda          | Mar 6, 2018              |
| NOP - Post proposals, Open public comment                         | Mar 6, 2018              |
| Discuss work agendas on ES call                                   | Mar 9, 2018              |
| Public comment closes   | Apr 4, 2018              |
| NOP - Send compiled public comments to NOSB                       | Apr 9, 2018              |
| Work agendas finalized on ES call (last call before fall meeting) | Apr 13, 2018             |
| Public comment webinar(s)   | Apr 17 & 19, 2018        |
| Spring 2018 NOSB meeting – Tucson, AZ                             | Apr 25-27, 2018          |

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (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) Crops Subcommittee (CS) Meeting Notes Tuesday January 16, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Asa Bradman (AB); Dave Mortensen (DM); Harriet Behar (HB); Joelle Mosso

(JM); Emily Oakley (EO); Sue Baird (SB) **Absent:** Jesse Buie (JB); Francis Thicke (FT)

Staff: Devon Pattillo (DP); Michelle Arsenault (MA)

## **Work Agenda**

| Petitioned Substance                                | Petitioned Substances |                  |   |                                  |          |  |  |  |
|---|-----------------------|------------------|---|----------------------------------|----------|--|--|--|
| Substance   | Con-<br>tact          | TR<br>request?   | Notes   | Discussed,<br><mark>Voted</mark> | Meeting  |  |  |  |
| Polyoxin D Zinc salt 205.601                        | JB                    | Y                | Petition sent to CS 06 16 16. Petition suff/TR request due 08 16 16. Petition found sufficient 08 16 16. Discuss need for Lmt'd scope TR. CS requested Lmt'd scope TR 10 04 16. TR sent to Subcommittee on 12 19 17. Response due 02 20 18.   | Feb 6                            | Spr 2018 |  |  |  |
| Allyl Isothiocyanate (AITC) Petition (2016) 205.601 | JB                    | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development  Expected Feb/Mar 2018.  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)   | Feb 6                            | Spr 2018 |  |  |  |
| Sodium Citrate<br>205.601                           | НВ                    | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015). TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18 | Sep 19,<br>2017                  | Spr 2018 |  |  |  |
| Natamycin   | НВ                    | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5                            | Spr 2018 |  |  |  |

| Sulfur (as a<br>molluscicide)<br>205.601   | АВ                      | N                | Petition sent to CS 06 08 17. Petition suff/TR request due 09 05 17. Petition found sufficient 09 19 17. No TR request.  | Sep 19<br><mark>Jan 16</mark> | Spr 2018                              |
|--|-------------------------|------------------|--|-------------------------------|---------------------------------------|
| Ammonium Citrate<br>205.601  | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21                        | TBD                                   |
| Ammonium<br>Glycinate<br>205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21                        | TBD                                   |
| Calcium Acetate  | SB                      |                  | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17.  | Feb 6                         | TBD                                   |
| Other Topics   |                         |                  |  |                               |                                       |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted           | Meeting                               |
| (Manure treatments) Anaerobic Digestate - Food Waste 205.601(j) and other manure issues            | EO/HB/J<br>M            | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017     | Spr 2018                              |
| Biodegradable<br>Biobased Mulch<br>annotation change   | нв/ав                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17.<br>Pending further research   | Aug 1, 2017                   | Spr 2018                              |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                           | Fall 2018                             |
| Marine materials<br>(marine algae and<br>extracts) on the<br>National List                         | EO                      | Disc doc         | NOP approved request 01 12 16. TR request sent to NOP 02 05 16. TR sent to HS 08 10 16. Returned to CS at Spr 2017 NOSB meeting. Referred back to CS at Spr 2017 meeting   | Aug 15,<br>Dec 5              | Spr 2018                              |
| Field and<br>Greenhouse<br>Container<br>Production   | JB, HB,<br>FT and<br>EO | TBD              | On hold as per NOP.  | Feb 6                         | Summary<br>of<br>comments<br>Spr 2018 |

| Strengthen and      | НВ  | Proposal | Originated in MS. Referred back to CS at |    | Spr 2018  |
|---------------------|-----|----------|--|----|-----------|
| clarify the         |     |          | Spr 2017 meeting. Referred back to CS at |    |           |
| requirements for    |     |          | Fall 2017 meeting.                       |    |           |
| use of organic seed |     |          |  |    |           |
| (NOP 5029)          |     |          |  |    |           |
| Research Priorities | All | NA       | RPs due to MS Aug 2018                   | NA | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets<br>TR Requests: July 2017, Summary: Spr 2018, Review: Fall 2018 |  |             |                    |   |                           |  |
|--|--|-------------|--------------------|---|---------------------------|--|
| Substance  |  | Con<br>tact | TR<br>requ<br>est? | Notes   | Scheduled,<br>Discussed   | Meeting                                      |
| Alcohols:<br>Ethanol<br>Isopropanol  | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol   | Feb 6                     | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate   | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR   | Dec 5                     | u  |
| Newspaper or other recycled paper  | 205.601(b) and (c)                                 | НВ          | N                  | 2017 TR   | Dec 5                     | и  |
| Plastic mulch and covers   | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority  | Dec 19, Jan 2             | u  |
| Aqueous<br>potassium<br>silicate   | 205.601(e),<br>205.601(i)                          | DM          | N                  | <u>2014 TR</u>  | Jan 2,<br>Feb 6           | u  |
| Elemental sulfur   | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. TR sent to CS 01 10 18. TR sufficiency due 03 12 18 | Dec 19,<br>Jan 2<br>Feb 6 | и  |
| Lime sulfur  | 205.601(e)(6),<br>205.601(i)(6)                    | SE          | N                  | 2014 TR   | Dec 19                    | u  |
| Sucrose octanoate esters   | 205.601(e)(10)                                     | SB          | N                  | 2005 TR   | Dec 19                    | u  |
| Hydrated lime  | 205.601(i)(4)                                      | DM          | N                  | 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide   | Jan 2                     | u  |
| Liquid fish<br>products  | 205.601(j)   | AB          | N                  | 1995 TAP; 2006 TR   | Jan 16                    | u  |
| Sulfurous Acid   | 205.601(j)   | SE          | N                  | 2010 TAP; 2014 TR   | Dec 19                    | u  |

| Ethylene         | 205.601(k) | EO | N | 2000 Supplemental TAP; 2007 TAP;     | Dec 19 | u |
|------------------|------------|----|---|--------------------------------------|--------|---|
|                  |            |    |   | 2011 Supplemental TR                 |        |   |
| Microcrystalline | 205.601(o) | SB | Υ | None. TR requested 07 28 17. In      | Dec 19 | и |
| cheesewax        |            |    |   | contracting. TR sent to CS 01 11 18. |        |   |
|                  |            |    |   | TR sufficiency due 03 13 18.         |        |   |
| Potassium        | 205.602(e) | JM | N | 1995 TAP. Low priority               | Jan 16 | и |
| chloride         |            |    |   |                                      |        |   |
|                  |            |    |   |                                      |        |   |

- Approve notes from January 2 call.
- Calcium Acetate (SB) petition sufficiency/TR request
- Polyoxin D Zinc salt (JB) TR sufficiency
- Sulfur (as a molluscicide) (AB) Discuss proposal.
- 2020 sunset: Hydrated Lime(DM) Discuss review
- 2020 sunset: Liquid fish products (AB) Discuss review
- 2020 sunset: Alcohols: Ethanol Isopropanol (JB) Discuss review
- 2020 sunset: Potassium chloride (JM) Discuss review
- Discussion of future options for hydroponics/container proposals
- Adjourn

#### Discussion

- Notes from January 2, 2018 were approved with no changes.
- Calcium Acetate (SB). The discussion was deferred to the next call. A member asked a question regarding the petition, clarifying that the petition is not for blended products and is only for calcium acetate.
- Polyoxin D Zinc salt (JB) TR sufficiency. Deferred to next call.
- Sulfur (as a molluscicide) (AB). The lead summarized the use of the material, noting that the toxicology of how it actually kills molluscs is not identified in the petition. The CS found the petition sufficient and the CS did not request a new TR as there are several other TRs available. The lead noted that because this petition is for pelletized sulfur, and therefore does not have human health issues that other forms of sulfur would. As for alternatives, there are manual and cultural methods. On balance the material is compliant with OFPA.

Sulfur is classified as synthetic

Motion to add sulfur as petitioned at §205.601(h)

Motion by: AB Seconded by: DM

Additional discussion: None

Yes: 7 No: 0 Abstain: 0 Absent: 2 Recuse: 0

- **2020 sunset: Hydrated Lime (DM).** The lead indicated that the last TR was comprehensive. Hydrated lime is used as a foliar application for plant disease suppression in fruit and vegetable crops. The Subcommittee will forward the document for submission to the NOP.
- 2020 sunset: Liquid fish products (AB). The lead summarized the uses and production of liquid fish products, which are used as fertilizers and nutrients. There is a 1995 TAP and a 2006 TR. The group discussed human health issues, pH, and sustainability. The NOP suggested adding a reference in the review to the recent squid byproduct recommendation, which will be published tomorrow in the Federal Register as part of a proposed rule.
- 2020 sunset: Alcohols: Ethanol Isopropanol (JB). Deferred to next call.
- **2020** sunset: Potassium chloride (JM). The lead summarized the use and manufacture of the material, based on information from the TR and the previous reviews. The lead noted that there were no concerning issues regarding this material. A member suggested the addition of a question about necessity and alternatives.
- **Discussion of future options for container proposals.** Deferred to next call.
- The meeting was adjourned

### **Previous CS Notes**

# Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

January 2, 2018

2020 sunset: Plastic mulch and covers (HB) - Review/vote on proposal

2020 sunset: Aqueous potassium silicate (DM) - Discuss review (postponed from Dec 19<sup>th</sup> call)

2020 sunset: Hydrated lime (DM) - Discuss review (postponed from Dec 19th call)

2020 sunset: Elemental sulfur (AB) - Discuss review

### January 16, 2018

Calcium Acetate (SB) - petition sufficiency/TR request

Polyoxin D Zinc salt (JB) - TR sufficiency

Sulfur (as a molluscicide) (AB) - Discuss proposal. 2020 sunset: Hydrated Lime (DM) - Discuss review 2020 sunset: Liquid fish products (AB) - Discuss review

2020 sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss review

2020 sunset: Potassium chloride (JM) - Discuss review Discussion of future options for container proposals

### February 6, 2018

2020 sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss review

Polyoxin D Zinc salt (JB) - TR sufficiency

2020 sunset: Aqueous potassium silicate (DM) - Discuss review

Calcium Acetate (SB) - petition sufficiency/TR request

2020 sunset: Microcrystalline cheesewax (SB) - TR sufficiency

2020 sunset: Elemental sulfur TR sufficiency (AB)

Discussion of future options for container proposals (HB)

February 20, 2018 March 6, 2018

Allyl Isothiocyanate (AITC) - TR sufficiency (JB)

March 20, 2018

April 3, 2018

April 17, 2018

May 1, 2018

May 15, 2018

June 5, 2018
June 19, 2018
July 3, 2018
July 17, 2018
August 7, 2018
August 21, 2018
September 4, 2018
September 18, 2018
October 2, 2018
October 16, 2018
November 6, 2018
November 20, 2018
December 4, 2018
December 18, 2018

| Spring 2018 Milestones  | Target dates (tentative) |
|---|--------------------------|
| New NOSB member orientation                                       | TBD                      |
| NOSB - Spring 2018 proposals due to NOP                           | Feb 21, 2018             |
| NOP - Complete Spring 2018 NOSB meeting tentative agenda          | Mar 6, 2018              |
| NOP - Post proposals, Open public comment                         | Mar 6, 2018              |
| Discuss work agendas on ES call                                   | Mar 9, 2018              |
| Public comment closes   | Apr 4, 2018              |
| NOP - Send compiled public comments to NOSB                       | Apr 9, 2018              |
| Work agendas finalized on ES call (last call before fall meeting) | Apr 13, 2018             |
| Public comment webinar(s)   | Apr 17 & 19, 2018        |
| Spring 2018 NOSB meeting – Tucson, AZ                             | Apr 25-27, 2018          |

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (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) Crops Subcommittee (CS) Meeting Notes Tuesday January 2, 2018 2:00 pm ET

Present: Steve Ela, Chair (SE); Asa Bradman (AB); Jesse Buie (JB); Dave Mortensen (DM); Harriet Behar (HB);

Joelle Mosso (JM); Tom Chapman (TC)

Absent: Michelle Arsenault (MA); Francis Thicke (FT); Emily Oakley (EO); Sue Baird (SB)

Staff: Devon Pattillo (DP); Lisa Brines (LB)

## **Work Agenda**

| Substance   | Con-<br>tact | TR request?      | Notes   | Discussed,<br>Voted | Meeting  |
|---|--------------|------------------|---|---------------------|----------|
| Polyoxin D Zinc salt<br>205.601                           | JB           | Y                | Petition sent to CS 06 16 16. Petition suff/TR request due 08 16 16. Petition found sufficient 08 16 16. Discuss need for Lmt'd scope TR. CS requested Lmt'd scope TR 10 04 16. TR sent to Subcommittee on 12 19 17. Response due 02 20 18.   | Feb 6, 2018         | Spr 2018 |
| Allyl Isothiocyanate<br>(AITC) Petition<br>(2016) 205.601 | JB           | Y Lmt'd<br>scope | Petition sent to CS 07 06 16. Petition suff/TR request due 09 06 16. Petition found suff 10 04 16. CS requested Lmt'd scope TR 10 04 16. TR in development  Expected Feb/Mar 2018.  • AITC Petition (2013) (PDF)  • NOSB Subcommittee Proposal (2014) (PDF)  • Technical Evaluation Report (2014) (PDF)   | Feb 6, 2018         | Spr 2018 |
| Sodium Citrate<br>205.601                                 | НВ           | Y                | Petition sent to CS 07 27 16. Petition suff/TR request due 09 27 16. Petition was found sufficient 10 04 16. CS requested a TR 10 04 16. TR in development.  TR - Handling, Citric acid and salts (2015). TR sent to CS 08 07 17. Response due 10 06 17. Found TR insufficient 09 19 17. HS sent additional questions to TR contractor 12 11 17. Revised TR sent to CS 12 20 17.  Response due 02 19 18 | Sep 19,<br>2017     | Spr 2018 |
| Natamycin   | НВ           | Y                | Petition sent to CS 09 09 16. Petition suff/TR request due 11 08 16. Petition found sufficient 11 01 16, and CS requested TR 11 01 16. TR in development. Expected October 2017. TR sent to CS 11 3 17. Response due 01 12 18. TR found sufficient 12 5 17.   | Dec 5               | Spr 2018 |

| Cultur Inna  | I AD                    | N.               | T  | C 10                      | C 2010    |
|--|-------------------------|------------------|--|---------------------------|-----------|
| Sulfur (as a molluscicide) 205.601   | AB                      | N                | Petition sent to CS 06 08 17. Petition suff/TR request due 09 05 17. Petition found sufficient 09 19 17. No TR request.  | Sep 19<br>Jan 16          | Spr 2018  |
| Ammonium Citrate<br>205.601  | EO/DM                   |                  | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21                    | TBD       |
| Ammonium<br>Glycinate<br>205.601   | EO/DM                   | Y                | Petition sent to CS 10 25 17. Petition suff/TR request due 12 26 17. TR requested 11 21 17.  | Nov 21                    | TBD       |
| Calcium Acetate  | SB                      |                  | Petition sent to CS 1 20 17. Petition suff/TR request due 01 17 17.  | Jan 16                    | TBD       |
| Other Topics   |                         |                  |  |                           |           |
| Project  | Con-<br>tact            | Doc type         | Notes*   | Discussed/<br>Voted       | Meeting   |
| (Manure<br>treatments)<br>Anaerobic<br>Digestate - Food<br>Waste<br>205.601(j) and<br>other manure<br>issues | EO/HB/J<br>M            | Disc Doc         | Petition sent to CS 04 08 15. Questions or request for TR due 06 09 15. Petition found sufficient 06 02 15. TR rqst sent to NOP 10 06 15. Petition withdrawn 10 14 15. CS moved project to "other topics" NOP sent memo to board 05 09 16 requesting review. TR request sent to NOP 07 05 16 (see anaerobic digestate above). Waiting for result of FDA's risk assessment. | Aug 1,<br>Aug 15,<br>2017 | Spr 2018  |
| Biodegradable<br>Biobased Mulch<br>annotation change   | НВ/АВ                   | Disc Doc         | Limited scope TR request sent to NOP 08 02<br>16. TR sent to CS on 12 28 16. TR Suff due<br>02 27 17. CS found TR suff 01 03 17.<br>Pending further research   | Aug 1, 2017               | Spr 2018  |
| Prohibition of NPEs<br>in inerts -<br>annotation change/<br>EPA List 4 Inerts<br>annotation change           | HB/EO/<br>DM/AB         | Disc<br>Doc/Prop | IWG recommended NOSB work on NPEs/TR requested July 2014. DD - April 2016. EPA List 4 inerts disc doc (originated from 2017 sunset review conducted in 2015). Pending EPA decision   | TBD                       | Fall 2018 |
| Marine materials<br>(marine algae and<br>extracts) on the<br>National List                                   | EO                      | Disc doc         | NOP approved request 01 12 16. TR request sent to NOP 02 05 16. TR sent to HS 08 10 16. Returned to CS at Spr 2017 NOSB meeting. Referred back to CS at Spr 2017 meeting   | Aug 15,<br>Dec 5          | Spr 2018  |
| Field and<br>Greenhouse<br>Container<br>Production   | JB, HB,<br>FT and<br>EO | TBD              |  | Jan 2                     | Spr 2018  |

| Strengthen and      | НВ  | Proposal | Originated in MS. Referred back to CS at | Spr 2018  |
|---------------------|-----|----------|--|-----------|
| clarify the         |     |          | Spr 2017 meeting. Referred back to CS at |           |
| requirements for    |     |          | Fall 2017 meeting.                       |           |
| use of organic seed |     |          |  |           |
| (NOP 5029)          |     |          |  |           |
| Research Priorities | All | NA       | RPs due to MS Aug 2018                   | Fall 2018 |

<sup>\*</sup> Yellow highlight indicates Subcommittee action needed \*Highlight indicates review completion

| 2020 Sunsets<br>TR Requests: July 2  | 2017, Summary: Sp                                  | r 2018,     | Review             | v: Fall 2018  |                         |  |
|--------------------------------------|--|-------------|--------------------|---|-------------------------|--|
| Substance                            |  | Con<br>tact | TR<br>requ<br>est? | Notes   | Scheduled,<br>Discussed | Meeting                                      |
| Alcohols:<br>Ethanol<br>Isopropanol  | 205.601(a)(1)(i),<br>205.601(a)(1)(ii)             | JB          | N                  | 1995 TAP; 2014 TR - Ethanol; 2014<br>TR - Isopropanol                   | Jan 16                  | Summary:<br>Spr 2018<br>Review:<br>Fall 2018 |
| Sodium<br>carbonate<br>peroxyhydrate | 205.601(a)   | EO          | N                  | 2006 TAP; 2014 TR   | Dec 5                   | и  |
| Newspaper or other recycled paper    | 205.601(b) and (c)                                 | НВ          | N                  | 2017 TR   | Dec 5                   | и  |
| Plastic mulch and covers             | 205.601(b)   | НВ          | N                  | 1995 TAP: TR for biodegradable mulch. Low priority                      | Dec 19, Jan 2           | и  |
| Aqueous<br>potassium<br>silicate     | 205.601(e),<br>205.601(i)                          | DM          | N                  | 2014 TR   | Jan 2                   | u  |
| Elemental sulfur                     | 205.601(e)(5),<br>205.601(i)(10),<br>205.601(j)(2) | AB          | Y                  | 1995 TAP; 2017 TR for Livestock. TR requested 07 28 17. In contracting. | Dec 19, Jan 2           | и  |
| Lime sulfur                          | 205.601(e)(6),<br>205.601(i)(6)                    | SE          | N                  | 2014 TR   | Dec 19                  | u  |
| Sucrose octanoate esters             | 205.601(e)(10)                                     | SB          | N                  | 2005 TR   | Dec 19                  | u  |
| Hydrated lime                        | 205.601(i)(4)                                      | DM          | N                  | 1995 TAP; 2001 TAP; 2002 TR for Calcium Hydroxide                       | Jan 2                   | u  |
| Liquid fish products                 | 205.601(j)   | AB          | N                  | <u>1995 TAP</u> ; <u>2006 TR</u>  | Jan 16                  | u  |
| Sulfurous Acid                       | 205.601(j)   | SE          | N                  | 2010 TAP; 2014 TR   | Dec 19                  | и  |

| Ethylene                   | 205.601(k) | EO | N | 2000 Supplemental TAP; 2007 TAP;             | Dec 19 | u |
|----------------------------|------------|----|---|--|--------|---|
|                            |            |    |   | 2011 Supplemental TR                         |        |   |
| Microcrystalline cheesewax | 205.601(o) | SB | Υ | None. TR requested 07 28 17. In contracting. | Dec 19 | и |
| Potassium<br>chloride      | 205.602(e) | JM | N | 1995 TAP. Low priority                       | Jan 16 | и |

- 2020 sunset: Plastic mulch and covers (HB) Review/vote on proposal
- 2020 sunset: Aqueous potassium silicate (DM) Discuss review (postponed from Dec 19<sup>th</sup> call)
- 2020 sunset: Hydrated lime (DM) Discuss review (postponed from Dec 19<sup>th</sup> call)
- Sulfur (as a molluscicide) Review/vote on proposal
- 2020 sunset: Alcohols: Ethanol Isopropanol (JB) Discuss review
- 2020 sunset: Elemental sulfur (AB) Discuss review
- 2020 sunset: Liquid fish products (AB) Discuss review
- 2020 sunset: Potassium chloride (JM) Discuss review
- Discussion of future options for hydroponics/container proposals. (postponed from Dec 19<sup>th</sup> call)
- Adjourn

### Discussion

- Notes from December 19, 2017 were approved without change.
- 2020 sunset: Plastic mulch and covers (HB). The lead discussed changes made to the document since the last call. The lead discussed differences between film type plastic covers and mesh type/woven plastic covers that are more resistant to breakdown. The lead described uses of these products in crop production systems and certifier interpretations of the requirement to remove at the end of the growing or harvest season. Members discussed questions for the document, including a question to solicit input on disposal methods. The lead will recirculate a revised draft.
- **2020** sunset: Aqueous potassium silicate (DM). The lead summarized the uses of the substance and the last review of the substance by the NOSB. The lead has prepared several questions to include in the document for the spring meeting. Members noted their support for the additional questions and offered refinements.
- **2020 sunset: Hydrated lime (DM).** The lead summarized the use of this listing of the substance on the National List for plant disease control. The lead will review information from the most recent sunset review and update the document. The subcommittee will discuss on the next call.
- **Sulfur (as a molluscicide).** Discussion was postponed to the next call.
- 2020 sunset: Alcohols: Ethanol, Isopropanol (JB). Discussion was postponed to the next call.
- 2020 sunset: Elemental sulfur (AB). The lead discussed the substance, its uses, sources, and recent research. The lead noted the substance is widely used (according to CA pesticide use data) and adverse health impacts have been noted. The lead noted that wet and dry formulations of sulfur may have different risks. The NOP noted that a new technical report should be available in the coming weeks. The CS will revisit the document after review of the technical report.
- 2020 sunset: Liquid fish products (AB). Discussion was postponed to the next call.
- 2020 sunset: Potassium chloride (JM). Discussion was postponed to the next call.
- **Discussion of future options for hydroponics/container proposals.** Discussion was postponed to the next call.
- The meeting was adjourned

## Future Call Schedule (1st and 3rd Tuesdays 2:00 ET)

December 19, 2017

2020 sunset: Plastic mulch and covers (HB) - Discuss review

2020 sunset: Lime sulfur (SE) - Discuss review

2020 sunset: Sulfurous Acid (SE) - Discuss review

2020 sunset: Ethylene (EO) - Discuss review

2020 sunset: Sucrose octanoate esters (SB) - Discuss review

2020 sunset: Microcrystalline cheesewax (SB) - Discuss review

January 2, 2018

2020 sunset: Plastic mulch and covers (HB) – Review/vote on proposal

2020 sunset: Aqueous potassium silicate (DM) - Discuss review (postponed from Dec 19<sup>th</sup> call)

2020 sunset: Hydrated lime (DM) - Discuss review (postponed from Dec 19<sup>th</sup> call)

2020 sunset: Elemental sulfur (AB) - Discuss review

January 16, 2018

Calcium Acetate (SB) - petition sufficiency/TR request

Polyoxin D Zinc salt (JB) - TR sufficiency

Sulfur (as a molluscicide).

2020 sunset: Liquid fish products (AB) - Discuss review

2020 sunset: Alcohols: Ethanol Isopropanol (JB) - Discuss review

2020 sunset: Potassium chloride (JM) - Discuss review

Discussion of future options for hydroponics/container proposals

February 6, 2018

Allyl Isothiocyanate (AITC) - TR sufficiency (pending receipt of TR)

February 20, 2018

March 6, 2018

March 20, 2018

April 3, 2018

April 17, 2018

May 1, 2018

May 15, 2018

June 5, 2018

June 19, 2018

July 3, 2018

July 17, 2018

August 7, 2018

August 21, 2018

September 4, 2018

September 18, 2018

October 2, 2018

October 16, 2018

November 6, 2018

November 20, 2018

December 4, 2018

December 18, 2018

| Spring 2018 Milestones                  | Target dates (tentative) |
|---|--------------------------|
| New NOSB member orientation             | TBD                      |
| NOSB - Spring 2018 proposals due to NOP | Feb 21, 2018             |

| NOP - Complete Spring 2018 NOSB meeting tentative agenda          | Mar 6, 2018       |
|---|-------------------|
| NOP - Post proposals, Open public comment                         | Mar 6, 2018       |
| Discuss work agendas on ES call                                   | Mar 9, 2018       |
| Public comment closes   | Apr 4, 2018       |
| NOP - Send compiled public comments to NOSB                       | Apr 9, 2018       |
| Work agendas finalized on ES call (last call before fall meeting) | Apr 13, 2018      |
| Public comment webinar(s)   | Apr 17 & 19, 2018 |
| Spring 2018 NOSB meeting – Tucson, AZ                             | Apr 25-27, 2018   |