## National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, January 10, 2017 1:00 pm ET

Attending: Harriet Behar (HB), Chair; Lisa de Lima (LD); Zea Sonnabend (ZS); Emily Oakley (EO); Tom Chapman (TC); Tracy Favre (TF); Dan Seitz (DS); A-dae Briones (ARB) Absent: Penny Zuck (PZ) Staff: Michelle Arsenault (MA); Lisa Brines (LB)

## Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal May 2012 Framework Proposal	EO	Subcommittee reps to MS TF - LS ZS - CS TC - HS RP from Subcomm due to MS in July		Fall 2017
Petition and TR tracking	HB/LB	Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Seed Purity from GMOs	ZS/DS	Proposal. Part of Seed Purity doc will be incorporated into "Prevention Strategies for Excluded Methods in Crops and Handling" doc. MS submitted a request to the ES in August to convene a seed purity task force. Pending NOP approval, for future work agenda.		TBD
Excluded Methods Terminology	ZS/HB	Proposal		TBD

Project Idea	Contact	Notes*	Vote	Meeting
NOP operating plan suggestions	ALL		NA	NA

- Approve December 13, 2016 notes
- Organic and Sustainable USDA update (LB)
- Materials and TR update (JW)
- Excluded Methods Terminology possible Spring 2017 Discussion Document (ZS, HB)
- Select new Subcommittee liaisons for Research Priorities
- Seed Purity from GMOs (DS)
- Seed thresholds add to work agenda as DD?
- Classification of Materials guidance document
- Adjourn

## Discussion

- Notes of December 13, 2016 were approved with no changes
- Organic and Sustainable USDA update (PZ)
  - Organic Cost Share Transition. On December 21, the USDA announced that starting March 20, 2017, organic producers and handlers will be able to visit over 2,100 USDA Farm Service Agency (FSA) offices around the country to apply for federal reimbursement to assist with the cost of receiving and maintaining organic or transitional certification. The National Organic Certification Cost Share Program (NOCCSP) and the Agricultural Management Assistance Organic Certification Cost Share Program offer opportunities for certified producers and handlers to receive reimbursement for up to 75 percent of certification costs each year up to a maximum of \$750 per certification scope-crops, livestock, wild crops and handling. The announcement also adds transitional certification and state organic program fees as additional scopes. More information is available at www.fsa.usda.gov/organic
  - The Organic Policy Advisor reviewed the 2016 Research Priorities document and didn't have any feedback.
  - HB clarified that there is not currently any organic transition, and that the Organic Cost Share Transition was put in place for future use. States that want to keep administering cost share, will, and will work with FSA so there isn't duplication.
- Materials and TRs update (LB).
  - Lisa Brines returned from her detail in the AMS front office and will be on the MS call from now on. Monthly Materials report was recently sent to the NOSB. Schedule for report is first Friday of month.
- Excluded Methods Terminology. (ZS, HB). Terminology will not move forward but will work on seed purity piece. New terms are included in written public comment. Excluded Methods structure is in place. The next step belongs to NOP. Possible Spring 2017 discussion document. The co-leads would like to ensure that GMO topics are discussed during each call.
- Seed Purity from GMOs (DS). On the next Executive team call, the MS Chair will repeat the request for the creation of a task force on seed purity. The proposal on seed purity could include thresholds for seed purity, and the Subcommittee feels that a task force would be the most successful way to gain ground on this topic. The group will develop a proposal for this topic.
- Select new Subcommittee liaisons for Research Priorities. The lead author circulated a one page summary based on last year's research priorities. Members discussed assigning a new lead, perhaps one of the new members. EO volunteered to lead this again if no one else volunteered in her place. New liaisons will be identified by the Spring NOSB meeting.

- **Classification of materials guidance document.** The MS Chair reviewed the NOSB comments and compared them to what was incorporated into the final guidance document. She indicated that most of the NOSB comments were incorporated, and that there was one outstanding issue: How to classify a generic material that is produced in numerous ways, which can result in both a synthetic and nonsynthetic form. The members considered working with the NOP to develop a framework, or use of annotation to clarify the difference between materials with the same generic name, if needed. The MS Chair will discuss this on the January 13 Exec call. TC will ask Scott Rice, who is the accredited certifying agent (ACA) member on the NOSB, about polling the ACAs for feedback to see if this is a problem in the community before proceeding.
- The meeting was adjourned

#### **Previous MS Notes**

January 9, 2018

Future Call Schedule (2<sup>nd</sup> Tuesday 1:00 ET) December 13, 2016 January 10, 2017 Select new Subcommittee liaisons for Research Priorities February 14, 2017 March 14, 2017s April 11, 2017 May 9, 2017 June 13, 2017 July 11, 2017 August 8, 2017 September 12, 2017 October 10, 2017 November 14, 2017 December 12, 2017

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

Work agendas finalized on ES call (last call before fall meeting)	Apr 7, 2017
Public comment webinar	Apr 13, 2017
Spring 2017 NOSB meeting – Denver, CO	Apr 19-21, 2017 (W-F)

## National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, March 14, 2017 1:00 pm ET

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Tom Chapman (TC) - observer Absent: Lisa de Lima (LD); Dave Mortensen (DM)

Staff: Michelle Arsenault (MA); Lisa Brines (LB)

## Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal May 2012 Framework Proposal	EO	Subcommittee reps to MS		Fall 2017
		DS - LS		
		EO - CS		
		LD - HS		
		RPs from Subcomm due to MS in		
		July		
Petition and TR tracking	HB/LB	Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Seed Purity from GMOs	DS	Proposal. Part of Seed Purity doc		TBD
		will be incorporated into		
		"Prevention Strategies for		
		Excluded Methods in Crops and		
		Handling" doc. MS submitted a		
		request to the ES in August to		
		convene a seed purity task force.		
		Pending NOP approval, for future		
		work agenda.		
Excluded Methods Terminology	ZS/HB	Proposal		TBD

Project Idea	Contact	Notes*	Vote	Meeting
NOP operating plan suggestions	ALL		NA	NA

- Approve January 10, 2017 notes
- Organic and Sustainable USDA update ()
- Materials and TR update (LB)
- Discuss Fall 2017 work agenda
- Adjourn

## Discussion

- Approval of the January 10 notes was deferred to next call.
- Task force on seed purity from GMOs. It's likely this project will not move forward until the new administration is in place and new AMS leadership is appointed. The MS chair asked for additional volunteers to work on this project, as it is complex and large. The two members on the call discussed various aspects of this topic, and will discuss it further with the additional members. The MS may have a document for discussion at the fall 2017 NOSB meeting.
- Organic and Sustainable USDA update (PZ via email)
  - The OWG held an update meeting March 2. The organic policy advisor position is vacant until the government hiring freeze is lifted, and the USDA/NOP encouraged the OWG to continue with the work they have been doing until the position is filled. The next OWG meeting is scheduled for May 23.
  - On March 7, three members of the NOP staff provided training to Farm Service Agency (FSA) state-level field employees who will be administering the National Organic Certification Cost Share Program and the Agricultural Management Assistance Organic Certification Cost Share Program. The training took place in Milwaukee, Wisconsin. Some of the attendees are also designated as the "organic champions" for their state. The training included the history of the cost share programs, an overview of the NOP, and the USDA certification process. The MS chair also attended and participated in a panel.
- Materials and TR update (LB). The NOP recently sent the March materials update to the NOSB, and asked that folks provide any feedback. The NOP is expecting several TRs soon, including one for Sulfur for Livestock. The Handling Subcommittee recently requested a TR for silver dihydrogen citrate.
- Fall 2017 work agenda.
  - **Listings for handling materials that are both synthetic and nonsynthetic.** This topic will be undertaken by the Handling Subcommittee.
  - Cleansers, sanitizers and disinfectants. Members discussed the potential for adding this to the work agenda, as had been suggested by commenters. There was not much support when it was previously discussed in Livestock, but a member felt that commenters presented a compelling argument for why sanitizers should be reviewed as a group. A member suggested adding criteria to the materials review checklist, and the NOP emphasized that materials are evaluated against the criteria in OFPA and the Regulations, and adding other criteria must be consistent with those criteria for usefulness to rulemaking. The NOSB Chair reminded the group to consider the goal or outcome for this project, which must present a clear need and be actionable. Two NOSB members that are not on the Materials Subcommittee will be invited to a future MS call, as they are well versed in the use of sanitizers. EO will send them an email and MA will invite them to the MS call in May or June.

- Other topics.
  - The Research Priorities liaisons to the other NOSB Subcommittees were clarified (see table above)
  - The MS Chair requested a change to the meeting time: The new proposed time is 2:00 ET/11:00 PT, swapping the MS call with the PDS Subcommittees call. If the change is confirmed by Subcommittee members, MA will reschedule accordingly.
- The meeting was adjourned

#### **Previous MS Notes**

Future Call Schedule (2<sup>nd</sup> Tuesday 1:00 ET) January 10, 2017 Select new Subcommittee liaisons for Research Priorities February 14, 2017 - cancelled March 14, 2017 April 11, 2017 May 9, 2017 Sanitizers (EO, JM, AB) June 13, 2017 July 11, 2017 August 8, 2017 September 12, 2017 October 10, 2017 November 14, 2017 December 12, 2017 January 9, 2018

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

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

## National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, May 9, 2017 2:00 pm ET

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Lisa de Lima (LD);
Dave Mortensen (DM); Tom Chapman (TC) - observer
Absent: none
Staff: Michelle Arsenault (MA); Lisa Brines (LB)

#### Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal	EO	Subcommittee reps to MS		Fall 2017
May 2012 Framework Proposal		DS - LS		
		EO - CS		
		LD - HS		
		RPs from Subcomm due to MS in		
		July		
Petition and TR tracking	HB/LB	Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Seed Purity from GMOs	DS, DM,	Proposal. Part of Seed purity doc		DD? Fall 2017
		will be incorporated into		
		"Prevention Strategies for		
		Excluded Methods in Crops and		
		Handling" doc. MS submitted a		
		request to the ES in August to		
		convene a seed purity task force.		
		Pending NOP approval, for future work agenda.		
		-		
Excluded Methods Terminology	НВ	Proposal		TBD

Project Idea	Contact	Notes*	Vote	Meeting
NOP operating plan suggestions	ALL		NA	NA

- Approve January 10, 2017 notes
- Approve March 14, 2017 notes
- Organic and Sustainable USDA update
- Materials and TR update (LB) -
- Seed purity (GMO thresholds and/ or other methods for keeping GMOs out of organic seeds) (DS)
- Excluded methods (HB) update and determine path forward
- Other topics
- Adjourn

## Discussion

- Notes of January 10 were approved with corrections to the title of the seed purity from GMOs work agenda item.
- Notes of March 14 were approved with no changes
- **Organic and Sustainable USDA update (LB/MA).** The Organic policy Advisor position is currently not staffed, and until it is, Paul Lewis will be the NOP contact for distributing the Research Priorities to other USDA agencies.
- Materials and TR update (LB). Two materials were removed from the Materials' spreadsheet based on outcomes from the NOSB's Denver meeting: L-Methionine and DNA Tracers. The NOP expects the TR for SDBS soon.
- Seed Purity from GMOs. The group discussed the path forward for this project, and feel that given the complexity of the topic and feedback from stakeholders on previous iterations, a discussion document would be the best vehicle. Several MS members will co-lead the review. One member noted that he has received input from stakeholders and that this is a topic of great interest. The MS Chair suggested laying out a project plan with goals and timelines, and the group discussed the formation of a working group and the possibility of inviting speakers to future MS calls to address the group.
- Excluded methods (HB). Deferred
- Other topics
  - Sanitizers. The group discussed a comprehensive review of all sanitizers on the National List, which was suggested by public commenters. The MS Chair noted that sanitizers is a topic that is crosscutting across Crops, Handling, and Livestock, and at this stage, feels that it would be useful to begin with an assessment or baseline. HB will work with two other NOSB members (JM and AB) to develop an initial document requesting the addition of this to the work agenda. The Subcommittee does not anticipate a document for the Fall 2017 NOSB meeting. The NOSB Chair asked that HB review the guidance in the PPM about adding items to the work agenda.
  - **Research Priorities.** The HS will add discussion time for the Research Priorities on the next call. Each of the liaisons will ask the other Subcommittees to review previous priorities and begin thinking about additional priorities for the Fall 2017 proposal.
  - Contamination of farm inputs. The group briefly discussed this Crops project, and whether or not the MS should take it over. No conclusion was reached.
- The meeting was adjourned

#### Previous MS Notes

# Future Call Schedule (2<sup>nd</sup> Tuesday 2:00 ET)

March 14, 2017 April 11, 2017- cancelled May 9, 2017 June 13, 2017 Sanitizers (EO, JM, AB) Research Priorities July 11, 2017 August 8, 2017 September 12, 2017 October 10, 2017 November 14, 2017 December 12, 2017 January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~May 5, 2017
NOSB Request for TRs for 2020 sunset materials	July 17, 2017
NOP - Complete Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26,
	2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

## National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, June 13, 2017 2:00 pm ET

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Lisa de Lima (LD); Dave Mortensen (DM); Tom Chapman (TC) - observer Absent: none Staff: Michelle Arsenault (MA); Lisa Brines (LB)

#### Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal	EO	Subcommittee reps to MS		Fall 2017
May 2012 Framework Proposal		DS - LS		
		EO - CS		
		LD - HS		
		RPs from Subcomm due to MS in		
		July		
Petition and TR tracking	HB/LB	Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Seed Purity from GMOs	DS, DM, HB	Proposal. Part of Seed purity doc		Discussion doc
		will be incorporated into		Fall 2017
		"Prevention Strategies for		
		Excluded Methods in Crops and		
		Handling" doc. MS submitted a		
		request to the ES in August to		
		convene a seed purity task force.		
		Pending NOP approval, for future		
		work agenda.		
Excluded Methods Terminology	НВ	Proposal		Fall 2017

Project Idea	Contact	Notes*	Vote	Meeting
Contamination Issues of Farm Inputs	FT/HB	Moved to Materials from Crops for continued work.		Fall 2017
NOP operating plan suggestions	ALL		NA	NA

- Approve May 9, 2017 notes
- Organic and Sustainable USDA update (LB/MA)
- Materials and TR update (LB)
- Research Priorities (All)
- Seed Purity ad hoc committee update (DS)
  - Seed purity task force update from NOP
- Excluded Methods (HB)
- Sanitizers (EO, JM, AB)
- Discussion on contaminated inputs (HB)
- Other topics
- Adjourn

## Discussion

- Notes of May 9 were approved with no changes
- Organic and Sustainable USDA update (LB/MA). No update, as the organic policy advisor position is currently vacant.
- Materials and TR update (LB). The NOP circulated a new materials report on June 2, and noted a couple of new items. There is a new tab containing the list of the 2020 sunset materials. TR requests for those sunset materials are due by mid-July (~Wednesday July 19). The NOP has hired two new TR contractors, Nexight and Savan group, which will provide extra capacity to get TRs done in a timely manner.
- **Research priorities (All).** The Fall proposals are due to NOP by August 29, and the MS would like to collect the other Subcommittee's lists by mid-to-late July so they can compile them into one document. Representatives from NIFA and ARS have indicated that the brief one-page summary is extremely helpful. The MS research priorities are ready for discussion, and the group will review them on the next call.
- Status of Technical Reports: The NOP listed the status and expected delivery date of several TRs that are in development, including BPA, sodium citrate, natamycin, AITC, polyoxin D zinc salt, and silver dihydrogen citrate.
- Seed Purity ad hoc working group update (DS). The three co-leads have a meeting scheduled to talk about the plan to move forward with the seed purity discussion document for the Fall 2017 NOSB meeting. EO volunteered to participate in the conversations as well.
- Seed purity task force update from NOP (DS). The MS sent a formal request to the NOP asking to convene a seed purity task force and is waiting for a response.
- Excluded methods (HB). The MS Chair is actively working on a discussion document in consultation with a large and varied group of stakeholders, to collect more information. The MS is seeking practical advice and welcomes feedback and suggestions. A member suggested inviting a couple of academics who have expertise is plant breeding, and will forward their names.
- Sanitizers (EO, JM, AB). The Handling Subcommittee is in the process of gathering preliminary information and will not have anything ready for the fall meeting. A member of the Crops Subcommittee noted that this is a complex topic and perhaps grouping them into one review may not be realistic. The MS Chair is supportive of reviewing sanitizers as a group, or groups, and feels that it would be useful to look at them holistically. Another member noted that there are many variables, and is it not practical or realistic to evaluate all the scenarios to determine

which sanitizer is effective in what situation. Additionally, the technical information the Board would need for this type of review is not available via a technical report, and would be difficult to collect. The MS Chair will submit a formal work agenda item.

- **Contaminated inputs (HB).** This project will move from the Crops Subcommittee to the Materials Subcommittee for further work (added to work agenda above). A guidance document on green waste was put forth by the NOP in 2011, and in 2016 a lawsuit was filed and the judge vacated the guidance. The NOP was going to address this in rulemaking, but no rulemaking is not moving forward at this time due to the government transition. A member suggested that the NOSB could identify a specific problem and propose a solution. E.g. contamination of soil and water. The community is discussing options, such as a risk based approach.
- Other topics. None
- The meeting was adjourned

#### Previous MS Notes

Future Call Schedule (2<sup>nd</sup> Tuesday 2:00 ET) May 9, 2017 June 13, 2017 Excluded Methods (HB) Sanitizers (EO, JM, AB) Research Priorities (All) July 11, 2017 MS Research Priorities (All) Seed Purity disc doc (DS) Excluded Methods (HB) Sanitizers (EO, JM, AB) August 8, 2017 September 12, 2017 October 10, 2017 November 14, 2017 December 12, 2017 January 9, 2018

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

Two Public comment webinars	Oct 24, and if needed Oct 26,
	2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

# National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, July 11, 2017 2:00 pm

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Lisa de Lima (LD); Dave Mortensen (DM); Tom Chapman (TC) - observer Absent: none Staff: Michelle Arsenault (MA); Lisa Brines (LB)

#### Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal	EO	Subcommittee reps to MS		Fall 2017
May 2012 Framework Proposal		DS - LS		
		EO - CS		
		LD - HS		
		RPs from Subcomm due to MS in		
		July		
Petition and TR tracking	HB/LB	Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Non-GMO organic seed	DS, DM, HB	Part of Seed purity doc will be		Discussion doc
integrity (Seed Purity from		incorporated into "Prevention		Fall 2017
GMOs)		Strategies for Excluded Methods in		
		Crops and Handling" doc. MS		
		submitted a request to the ES in		
		August to convene a seed purity		
		task force. Pending NOP approval,		
		for future work agenda.		
Excluded Methods Terminology		Proposal		Fall 2017

Project Idea	Contact	Notes*	Vote	Meeting
Contamination Issues of Farm Inputs	FT/HB	Moved to Materials from Crops for continued work.		NA
Sanitizers	HB, EO, JM, AB			

NOP operating plan	ALL	NA	NA
suggestions			

- Approve June 13, 2017 notes
- Materials and TR update (LB)
- Update on AMS appointments (Organic Policy Advisor, AMS Administrator)? (LB/MA)
- MS Research Priorities (All)
- Non-GMO organic seed integrity (formerly seed purity) disc doc (DS)
- Excluded Methods (HB)
- Sanitizers (EO, JM, AB)
- Adjourn

## Discussion

- Notes of June 13 were approved with no changes
- Materials and TR update (LB). The NOP sent the July materials report last Friday, and invited feedback via email. Requests for TRs for the 2020 sunset substances are due July 19. The TR for BPA was recently sent to the Handling Subcommittee, and the TR for hypochlorous acid is expected soon and will be sent to the Livestock Subcommittee.
- Update on AMS appointments (Organic Policy Advisor, AMS Administrator)? (LB/MA). The Organic Policy Advisor position is vacant. No additional information is available at this time.
- **MS Research Priorities (All).** The lead circulated the previous list of research priorities and the group discussed the three MS priorities as a foundation for the 2017 priorities. Members discussed various topics for addition, including the possibility of adding pesticides residues in compost. After a lengthy discussion the MS chose to ask the Crops Subcommittee to consider developing a discussion document to gather more data on pesticides in compost as a baseline.
- Non-GMO organic seed integrity (formerly seed purity) disc doc (DS, DM, HB). The MS is working on a discussion document exploring the genetic integrity of seeds. The goal of the document is to answer specific questions regarding contamination. The co-leads are seeking input from various stakeholders.
- **Excluded Methods (HB).** The lead is discussing various issues with Subcommittee members and stakeholders and is anticipating having a proposal for the Fall 2017 meeting.
- Sanitizers (HB, EO, JM, AB). Members discussed a potential project on reviewing sanitizers as a group. Basic questions include, "What would a comprehensive list of sanitizers look like?", and "what information would it include?" The NOP noted that in other organic standards, sanitizers are listed in separate sections of the materials list, rather than being grouped with food ingredients. A member asked about adding another section on the National List, just for sanitizers: e.g. 205.607.
- **Other topics.** The MS added an extra call on August 22.
- The meeting was adjourned

#### Previous MS Notes

Future Call Schedule (2<sup>nd</sup> Tuesday 2:00 ET)

June 13, 2017 Excluded Methods (HB) Sanitizers (EO, JM, AB)

Research Priorities (All) July 11, 2017 MS Research Priorities (All) Seed Purity disc doc (DS) Excluded Methods (HB) Sanitizers (EO, JM, AB) August 8, 2017 Research Priorities (All) - discuss/vote Non-GMO organic seed integrity disc doc (DS) - discuss/vote Excluded Methods (HB) - discuss/vote August 22, 2017 - additional call September 12, 2017 October 10, 2017 November 14, 2017 December 12, 2017 January 9, 2018

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

# National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, August 8, 2017 2:00 pm ET

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Lisa de Lima (LD); Dave Mortensen (DM); Tom Chapman (TC) - observer Absent: none Staff: Michelle Arsenault (MA); Lisa Brines (LB)

#### Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal <u>May 2012 Framework Proposal</u> Petition and TR tracking	EO HB/LB	Subcommittee reps to MSDS - LS EO - CS LD - HS RPs from Subcomm due to MS in July Ongoing	Aug 8	Fall 2017
GMO Projects	Contact	Notes	Vote	Meeting
Non-GMO organic seed integrity (formerly Seed Purity from GMOs)	DS, DM, HB	Part of Seed purity doc will be incorporated into "Prevention Strategies for Excluded Methods in Crops and Handling" doc. MS submitted a request to the ES in August to convene a seed purity task force. Pending NOP approval, for future work agenda.	Aug 8, Aug 22	Proposal Spr 2018
Excluded Methods Terminology	НВ	Proposal? DD?	Aug 8, Aug 22	Fall 2017

Project Idea	Contact	Notes*	Vote	Meeting
Contamination Issues of Farm Inputs	FT/HB	Moved to Materials from Crops for continued work.	NA	Spring 2018
Sanitizers	HB, EO, JM, AB			Spring 2018
NOP operating plan suggestions	ALL		NA	NA

- Approve July 11, 2017 notes
- Update from USDA secretary's office, new liaison update
- Materials and TR update (LB)
- Research Priorities (All) discuss/vote
- Non-GMO organic seed integrity disc doc (DS) discuss/vote
   Seed purity task force update from NOP?
- Excluded Methods (HB) discuss/vote
- Adjourn

## Discussion

- The notes of July 11 were approved with the addition of HB to the sanitizers project.
- Update from USDA secretary's office, new liaison update. No new updates at this time.
- Materials and TR update (LB). The National List Manager provided an update on the latest materials report, including the posting of the TR for BPA, the list of TR requests for the 2020 sunset materials, and the expected date for the TR for glycolic acid for Livestock use. The NOP may have resources to contract more TRs as the end of the fiscal year approaches.
- Research Priorities (EO). The lead circulated a draft document and an executive summary to the MS members. The document was built upon last year's version, with updates and amendments based on feedback from all the Subcommittees. The group discussed various aspects of the document and proceeded to a vote.

Motion to accept the 2017 Research Priorities Motion by: EO Seconded by: DM Additional discussion: none Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

- Non-GMO organic seed integrity disc doc (DS). The MS is working on a proposal for the Spring 2018 meeting. In support of its development, the group would like to post the document to the open docket to collect feedback, and perhaps give a brief update at the Fall 2017 meeting.
- Excluded Methods (HB). The lead summarized the modifications made to the document since the last conversation, and the group discussed them briefly. Members were encouraged to provide feedback before the next call on August 22. The Subcommittee may develop a discussion document instead of a proposal for the Fall 2017 meeting.
- The meeting was adjourned

#### **Previous MS Notes**

Future Call Schedule (2<sup>nd</sup> Tuesday 2:00 ET) July 11, 2017 MS Research Priorities (All) Seed Purity disc doc (DS) Excluded Methods (HB) Sanitizers (EO, JM, AB)

#### August 8, 2017

Research Priorities (All) - discuss/vote Non-GMO organic seed integrity disc doc (DS) - discuss/vote Excluded Methods (HB) - discuss/vote August 22, 2017 - additional call Non-GMO organic seed integrity disc doc (DS) - discuss Excluded Methods (HB) - discuss/vote September 12, 2017 October 10, 2017 November 14, 2017 December 12, 2017 January 9, 2018

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

## National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, August 22, 2017 2:00 pm ET

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Lisa de Lima (LD); Dave Mortensen (DM); Tom Chapman (TC) - observer Absent: none Staff: Michelle Arsenault (MA); Lisa Brines (LB)

#### Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal <u>May 2012 Framework Proposal</u>	EO	Subcommittee reps to MSDS - LS EO - CS LD - HS RPs from Subcomm due to MS in July	Aug 8	Fall 2017
Petition and TR tracking	HB/LB	Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Non-GMO organic seed integrity (formerly Seed Purity from GMOs)	DS, DM, HB	Part of Seed purity doc will be incorporated into "Prevention Strategies for Excluded Methods in Crops and Handling" doc. MS submitted a request to the ES in August to convene a seed purity task force. Pending NOP approval, for future work agenda.	Aug 8, <mark>Aug 22</mark>	Proposal Spr 2018
Excluded Methods Terminology	НВ	Proposal	Aug 8, <mark>Aug 22</mark>	Fall 2017

Project Idea	Contact	Notes*	Vote	Meeting
Contamination Issues of Farm Inputs proposal	FT/HB	Moved to Materials from Crops for continued work.	NA	Spr 2018
Sanitizers	HB, EO, JM, AB	Pending request and NOP approval	TBD	Spr 2018
NOP operating plan suggestions	ALL		NA	NA

- Approve August 8, 2017 notes
- Materials and TR update (LB)
- Non-GMO organic seed integrity disc doc (DS) discuss/vote
- Excluded Methods (HB) discuss/vote
- Other items
- Adjourn

#### Discussion

- The notes of August 8 were approved with no changes.
- Materials and TR update (LB). The NOP will contract two additional technical reports for the 2020 sunset materials, both for Handling: magnesium stearate and calcium carbonate.
- Non-GMO organic seed integrity discussion document (DM, DS). The group discussed the format for this iteration, given that over the last several years there have been three discussion documents and a report. The MS would like to glean additional comments, and will post the previous discussion document, unaltered, with some instructions for commenters that the NOSB is seeking only new information. MA will send DS the link to the two previous discussion documents. Members will be given the opportunity to review the paragraph before posting. This same format may be used for the Handling Subcommittee's document on marine materials.

Motion to accept the discussion document on non-GMO organic seed integrity. Motion by: DS Seconded by: HB Additional discussion: none Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

 Excluded Methods (HB). The group considered putting this forth as a discussion document instead of a proposal, and ultimately chose to bring it as a proposal. Based on stakeholder feedback there is strong support for NOSB to provide a recommendation on this topic. The MS made some modifications to the document while on the call, and will add some questions for public comment.

Motion to accept the proposal on excluded methods Motion by: HB Seconded by: DS Additional discussion: none Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

#### • Other items.

- The MS may cancel the September 12 call. The Chair will determine this at a later date.
- A member asked about the possibility of changing the dates and times for the Executive call. The Exec call will remain as is on the second Friday of the month.
- A member circulated the Organic Farming and Research Foundation (OFRF) research priorities, noting that it contains several research priorities from the NOSB.
- The meeting was adjourned

#### **Previous MS Notes**

# Future Call Schedule (2<sup>nd</sup> Tuesday 2:00 ET)

August 8, 2017

Research Priorities (All) - discuss/vote Non-GMO organic seed integrity disc doc (DS) - discuss/vote Excluded Methods (HB) - discuss/vote August 22, 2017 - additional call

Non-GMO organic seed integrity disc doc (DS) - discuss Excluded Methods (HB) - discuss/vote September 12, 2017 - pending cancellation October 10, 2017 November 14, 2017 December 12, 2017 January 9, 2018

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

## National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, October 10, 2017 2:00 pm ET

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Lisa de Lima (LD);
Dave Mortensen (DM)
Absent: none
Staff: Michelle Arsenault (MA); Lisa Brines (LB)

#### Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal <u>May 2012 Framework Proposal</u>	EO	Subcommittee reps to MSDS - LS EO - CS LD - HS RPs from Subcomm due to MS in July	Aug 8	Fall 2017
Petition and TR tracking	HB/LB	Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Non-GMO organic seed integrity (formerly Seed Purity from GMOs)	DS, DM, HB	Part of Seed purity doc will be incorporated into "Prevention Strategies for Excluded Methods in Crops and Handling" doc. MS submitted a request to the ES in August to convene a seed purity task force. Pending NOP approval, for future work agenda.	Aug 8, <mark>Aug 22</mark>	Proposal Spr 2018
Excluded Methods Terminology	НВ	Proposal	Aug 8, <mark>Aug 22</mark>	Fall 2017

Project Idea	Contact	Notes*	Vote	Meeting
Contamination Issues of Farm Inputs proposal	FT/HB	Moved to Materials from Crops for continued work.	NA	Spr 2018
Sanitizers	HB, EO, JM, AB	Pending request and NOP approval	TBD	Spr 2018
NOP operating plan suggestions	ALL		NA	NA

- Approve August 22, 2017 notes
- Materials and TR update (LB)
- Sanitizers review
- Discussion of public comments
- Fall 2017 proposals and presentations.
- Crops proposal on strengthening the organic seed guidance.
- Other items
- Adjourn

## Discussion

- The notes of August 22 were approved with a minor language change under the discussion of non-GMO organic seed integrity
- Materials and TR update (LB). The NOP circulated the October materials report last week, and asked for any feedback or changes. The next report will be update and sent after the Fall meeting. The NOP is expecting several TRs, which will be the first from the new TR contractors, and will be the first reports that will identify the authors. Two TRs that are expected soon are Natamycin (Crops) and Silver Dihydrogen Citrate (Handling).
- Sanitizers review. The Chair indicated a desire to work on this item and has had several conversations with other NOSB members. The group discussed possible paths forward, including a separate section of the list for sanitizers. NOP asked that the MS develop a somewhat detailed scope for this project submitting the request to the ES and the NOP. The Chair would like to submit it to the Executive team for the October 13 call.
- **Public comments.** The group discussed the comments received thus far. The comment period closes October 11.
- Fall 2017 proposals and presentations.
  - o Research priorities proposal Emily Oakley will present summary
  - Non-GMO seed integrity discussion document Dan Seitz will present summary
  - Excluded methods proposal Harriet Behar will present summary. The NOP met with NIFA personnel, who had some questions and suggestions about this topic. NIFA offered technical support to the Board on techniques.
- Crops proposal on strengthening the organic seed guidance. The Chair noted some misinformation in the community about the proposal, and would like to address it at the meeting.
- Other items. none
- The meeting was adjourned

#### Previous MS Notes

#### Future Call Schedule (2<sup>nd</sup> Tuesday 2:00 ET)

August 22, 2017 - additional call Non-GMO organic seed integrity disc doc (DS) - discuss Excluded Methods (HB) - discuss/vote September 12, 2017 - pending cancellation October 10, 2017 November 14, 2017 December 12, 2017

# January 9, 2018

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

## National Organic Standards Board (NOSB) Materials/GMO ad hoc Subcommittee Meeting Notes Tuesday, December 12, 2017 2:00 pm ET

Attending: Harriet Behar (HB), Chair; Dan Seitz (DS), Vice Chair; Emily Oakley (EO); Dave Mortensen (DM) Absent: Lisa de Lima (LD) Staff: Michelle Arsenault (MA); Lisa Brines (LB); Paul Lewis (PL)

## Work agenda

Materials Projects	Contact	Notes	Vote	Meeting
Research Priorities Proposal <u>May 2012 Framework Proposal</u>	EO	Subcommittee reps to MSDS - LS EO - CS LD - HS RPs from Subcomm due to MS in		Fall 2018
Petition and TR tracking	HB/LB	July Ongoing	NA	NA
GMO Projects	Contact	Notes	Vote	Meeting
Non-GMO organic seed integrity proposal (formerly Seed Purity from GMOs)	DS, DM, HB	Part of Seed purity doc will be incorporated into "Prevention Strategies for Excluded Methods in Crops and Handling" doc. MS submitted a request to the ES in August to convene a seed purity task force. Pending NOP approval, for future work agenda.		Spr 2018
Excluded Methods Terminology	НВ	Proposal		Spr 2018

Project Idea	Contact	Notes*	Vote	Meeting
Contamination of Farm Inputs Discussion Document	НВ	Moved to Materials from Crops for continued work.	NA	Spr 2018
Sanitizers	HB, EO, JM, AB	Pending NOP approval	TBD	Spr 2018

- October 10, 2017 notes
- Materials and TR update (LB)
- Sanitizers review update (HB and NOP)
- Non-GMO organic seed integrity proposal (DS, DM, HB)
- Excluded methods terminology (HB)
- Contamination of farm inputs (FT/HB)
- Other items
- Adjourn

#### Discussion

- The notes of October 10 were approved via email in November, and were confirmed on the call
- Materials and TR update (LB). The most recent materials' report was circulated at the beginning of December, and the NOP will make subsequent updates for the next update.
- Sanitizers review update (HB and NOP). The NOP suggested that the MS determine the goals or desired outcome for this proposal, and do so in a way that would not require rulemaking. The MS is seeking a better framework for reviewing new petitions for sanitizers as well as rereviewing them during sunset. The MS Chair indicated that because of many variables and gaps, it's difficult to have a broader view of all sanitizers. It would also be useful in understanding the prohibition of some sanitizers, such as quaternary ammonium sanitizers. The Chair noted that the EU regulations differ in that sanitizers are all listed under one section. One possible outcome could be the re-grouping of sanitizers on the NL. The MS will modify the request to add this to the work agenda and forward it to the NOP for approval.
- Non-GMO organic seed integrity proposal (DS, DM, HB). The co-leads have discussed the development of a draft proposal, which could take the form of guidance, and the desire to eventually convene a task force to explore this topic more. The MS will seek stakeholder feedback on the draft proposal once it is developed. The group discussed specifics for the document including baselines and tolerances, and the uncertainty that currently exists.
- Excluded methods terminology (HB). The MS Chair reviewed the final recommendation from the Fall 2017 meeting and discussed the possible directions as they move forward with this project. The MS is looking to add specificity and detail to the review criteria for excluded methods revisions to the table headings was circulated by email for feedback. The MS will work on a document with the intention of bringing it to the Spring 2018 meeting.
- Contamination of farm inputs (HB). This project has been on the NOSB work agenda since approximately August 2016 and the lead would like to continue work. Perhaps it will take the form of a risk assessment review of waste that goes into compost for use on organic lands. The group discussed a risk based assessment and will likely develop a discussion document to seek feedback on risk assessments. A member asked how to determine and measure contaminants. A member responded that it would be difficult if the number of items that is tested is too large. As an alternative he suggested that the most efficient process would be to work on the front end of the problem by limiting the inputs, instead of testing for contamination in the end product. The group also discussed manure and green waste. The lead will develop a draft for discussion on the next call, with an eye towards a discussion document for the Spring 2018 meeting.
- Other items. None.
- The meeting was adjourned

#### Previous MS Notes

# Future Call Schedule (2<sup>nd</sup> Tuesday 2:00 ET)

October 10, 2017 November 14, 2017 - cancelled December 12, 2017 January 9, 2018 February 13, 2018 March 13, 2018 April 10, 2018 May 8, 2018 June 12, 2018 July 10, 2018 August 14, 2018 September 11, 2018 October 9, 2018 November 13, 2018 December 11, 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