



The Organic Specialists

SEPTEMBER 2015 NOSB Preview

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"Eating is not merely a material pleasure. Eating well gives a spectacular joy to life and contributes immensely to goodwill and happy companionship. It is of great importance to the morale." --Elsa Schiaparelli

PRESIDENT'S MESSAGE

If you are part of the organic community, you know that continuous improvement is one of the cornerstones of organic agriculture—we strive to keep improving through better harnessing of the power of nature's systems.

Continuous improvement is built into the US organic regulations, too, through the sunset review of materials. The Fall 2015 meeting of the National Organic Standards Board includes 158 materials for review. Now is your best chance to advocate for keeping any of these materials you find necessary for your organic business and for removing those that are no longer required, thanks to improved access to non-synthetic and/or organic alternatives. For example, we appreciate the recommendation on flavors and how important it is to keep encouraging the use of organic materials whenever they are commercially available.

When you comment, consider the challenge of tracking all the usage of materials on the National List in all the diverse farming and production systems worldwide. Before you say something should never be used, take a moment to think of your farming and processing neighbors who may have different needs for their organic operations.

Reviewing all these materials isn't easy, and we'd like to thank the National Organic Standards Board members for their time and effort. We'd especially like to send a shout out to the Crops and Livestock Subcommittees for their sound and sensible recommendation on inerts. This teamwork is much appreciated.

If you want to give oral comments, this meeting has been expanded to give you additional opportunities to do so via two webinars before the in-person meeting. This innovation is a great example of using technology to make meeting participation more sustainable.

Meanwhile, Wolf, DiMatteo + Associates can help you analyze your operation to determine if you or your suppliers are using any of these materials, can help prepare comments, and more. [Contact us today](#).

Bill Wolf

President

**Wolf, DiMatteo + Associates delivers the strategic expertise to help organic, socially, and Environmentally responsible products and projects reach their full potential—and flourish.*

ORGANIC REGULATORY UPDATES

NATIONAL ORGANIC STANDARDS BOARD FALL 2015 MEETING

Comment by October 5

The National Organic Standards Board meeting will take place at the Stoweflake Conference Center, Pinnacle Room, Stowe Vermont, October 26-29, 2015. Submit written comments on new and revised proposals and make requests for an oral presentation time slot by October 5. Use docket number AMS-NOP-15-0037 at http://www.regulations.gov/#!documentDetail;D=AMS_FRDOC_0001-1346 for comments, and [sign up](#) to request an oral comment slot.

New for this meeting will be oral comment periods in advance of the face-to-face meeting. Two webinars will offer extended time for comments (5 minutes versus 3 minutes during the in-person meeting) and will be part of the meeting record. The webinars will be October 13 and 20 from 1-4 p.m. ET. Speakers can have only one comment slot, during a webinar or in-person at the meeting.

Along with extensive [materials review and discussions](#) brought forward by subcommittees, the [agenda](#) includes presentations from NOP staff, and a presentation from the National Institute of Food & Agriculture (NIFA).

Crops Subcommittee

2017 Sunset Materials: *If the Crops Subcommittee is recommending a change in listing status or requesting specific information in public comment, it is noted below. See the meeting materials for more information.*

Note that a "yes" on sunset materials is a vote to remove and not relist the material.

§205.601 Synthetic substances allowed for use in organic crop production.

If the listing is not renewed, the sunset date for this set of materials is June 27, 2017 unless otherwise noted. If the Crops Subcommittee is recommending a change in listing status or requesting specific information in public comment, it is noted below. See the [meeting materials](#) for more information.

- Alcohol: Ethanol
- Alcohol: Isopropanol

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- Chlorine Materials: Calcium hypochlorite, Chlorine dioxide, Sodium hypochlorite
 - Hydrogen peroxide
 - Soap-based algicide/demossers: **The subcommittee is considering removing soap-based algicide/demossers from the National List.**
 - Herbicides, soap-based
 - Newspaper or other recycled paper
 - Plastic mulch and covers
 - Soaps, ammonium
 - Ammonium carbonate
 - Boric acid
 - Elemental sulfur
 - Lime sulfur
 - Oils, horticultural
 - Soaps, insecticidal
 - Sticky traps/barriers
 - Sucrose octanoate esters
 - Pheromone
 - Vitamin D3: **The subcommittee seeks comment on whether non-synthetic rodenticides are effective and should be considered as viable alternatives.**
 - Coppers, fixed
 - Copper sulfate
 - Hydrated lime
 - Potassium bicarbonate
 - Aquatic plant extracts
 - Humic acids: **The subcommittee recommends relisting, but the vote was split. Vote: 2 yes, 2 no, 1 abstain, 0 absent.**
 - Lignin sulfonate: This material is approved for multiple uses, as a chelating agent, dust suppressant and a floating agent in post-harvest handling. **The subcommittee recommended relisting as a chelating agent and dust suppressant (Vote: 0 yes, 5 no, 0 abstain, 1 absent) but recommended removal as a floating agent, as it is no longer essential (Vote: 5 yes, 0 no, 0 abstain, 1 absent).**
 - Magnesium sulfate: Meeting materials did not summarize Crops Subcommittee discussion of this material.
 - Micronutrients: Soluble boron products, Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt
 - Liquid fish products
 - Vitamin B1, C, E
 - Ethylene gas: **Comments sought on whether or not it is necessary for organic production. The subcommittee vote would remove ethylene gas from the national list.**
 - Sodium silicate: **The subcommittee vote would remove sodium silicate from the national list.**
 - EPA List 4 - Inerts of Minimal Concern: The Crops Subcommittee has been working towards a solution to reviewing the inerts that were formerly on EPA List 4 by collaborating with the EPA Safer Choice Program (SCP) (formerly Design for the Environment Program). **So for this Sunset review the subcommittee is proposing a renewal of the inerts listing while at the same time**

suggesting two annotation changes to be voted on separately. The first and overcharging change is slated for approval at this meeting: to remove the old List 4 terminology and replace it with Safer Choice reviews as well as allow for individual petitioned inerts (see below). The second annotation change involves the Nonylphenol Ethoxylates (NPEs.) It is unlikely that the NPEs would pass favorably through the SCP screening process. Therefore a separate annotation proposal is being proposed to prohibit this group but is not likely to be voted on at this meeting, thus giving time for suppliers to re-formulate their products with safer choices (see below).

- Microcrystalline cheesewax: Sunset date March 15, 2017

§205.602 Prohibited nonsynthetic substances

If the listing is not renewed, the sunset date for this set of materials is June 27, 2017 unless otherwise noted. If the Crops Subcommittee is recommending a change in listing status or requesting specific information in public comment, it is noted below. See the meeting materials for more information.

- Ash from manure burning
- Arsenic
- Lead salts
- Potassium chloride, prohibited unless derived from a mined source and applied in a manner that minimizes chloride accumulation in the soil.
- Sodium fluoaluminate
- Strychnine
- Tobacco dust (nicotine sulfate)

Proposals:

Annotation change for micronutrients: Public comment indicated soil testing for micronutrient deficiency was not effective. The proposal would change the annotation for micronutrients from "Soil deficiency must be documented by testing," to "Deficiency must be documented, resulting in this listing for micronutrients: 205.601 (j) - As a plant or soil amendment.

(6) Micronutrients - not to be used as a defoliant, herbicide, or desiccant. Those made from nitrates or chlorides are not allowed. Deficiency must be documented.

(i) Soluble boron products.

(ii) Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.

This change allows for other types of testing, professional recommendations, or published information specific to a crop or region. Vote to change annotation: 5 yes; 0 no; 0 abstain; 0 absent.

Annotation Changes for EPA List 4 Inerts:

Both the Crops and the Livestock Subcommittees propose the following change to 205.601(m)(1) and 205.603(e)(1), EPA List 4 – Inerts of Minimal Concern.

205.601(m) and 205.603(e) – As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this

section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances.

- (i) Substances permitted for use in minimal risk products exempt from pesticide registration under FIFRA section 25(b).1,
- (ii) Substances included on the EPA's Safer Chemical Ingredient List.
- (iii) Inert ingredients that are exempt from the requirement of a tolerance under 40 CFR 180.1122 – for use only in passive pheromone dispensers.
- (iv) [Reserved] (for any other inerts individually petitioned and reviewed)]

The changes would remove reference to the Environmental Protection Agency's List 4, which is no longer maintained. In addition, the Inerts Working Group provided a comparison between the Safer Chemicals Ingredient List (SCIL) criteria and the criteria NOSB uses for materials review. There is a lot of similarity between them but also some gaps that can be addressed by the NOSB in periodic review of the SCIL. Votes: Crops Subcommittee: 5 yes, 0 no, 0 abstain, 0 absent; Livestock Subcommittee: 5 yes, 0 no, 0 abstain, 1 absent.

Laminarin - petitioned for use as a disease control: The Crops Subcommittee reviewed the limited scope Technical Review, and found that Laminarin meets the criteria for classification as non-synthetic (natural), and therefore does not need to be petitioned for use in organic agriculture. **Its use is allowed.** Subcommittee vote: 5 yes; 0 no; 0 abstain.

Lignin Sulfonate - petitioned for removal from Section 205.601(I)(1) of the National List - for use as a floating agent in postharvest handling. Lack of public input either for or against continued listing of lignin sulfonate for use as a floating agent, as well as a trade association poll that showed no certified organic pear packers in the United States used the material, indicates to the subcommittee that this material is no longer necessary for organic production. **The subcommittee recommends no longer allowing the use of lignin sulfonate as a floating agent in postharvest handling.** Vote: 5 yes, 0 no, 0 abstain, 1 absent.

Sulfuric Acid - petitioned for use in organic crop production as a solubilizing agent to make micronutrients more available for plant uptake. The subcommittee **voted not to recommend listing sulfuric acid for this purpose** because it would produce highly refined forms of micronutrients that would circumvent natural soil biological processes. Vote on classification as synthetic: 5 yes, 0 no, 0 abstain, 0 absent. Vote on listing: 0 yes, 5 no, 0 abstain, 0 absent.

Brown seaweed extracts (aquatic plants extracts) - petitioned for use as a synthetic plant strengthener to improve shoot growth and seed germination, increase root growth and improve soil microbial count for use in various fruits, vegetables and cereal crops. The crops subcommittee evaluated this concurrently with laminarin, since they are both seaweed products. The production process and end uses vary, however, and the committee **voted not to recommend listing brown seaweed extracts** because potassium hydroxide is used in the production process and has a functional effect on the product by establishing a neutral pH. Vote to classify as synthetic: 5 yes, 0 no, 0 abstain, 0 absent. Listing vote: 0 yes, 5 no, 0 abstain, 0 absent.

Handling Subcommittee

2017 Sunset materials: Section 205.605 Nonagricultural (Nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).” If the Handling Subcommittee is recommending a change in listing status or requesting specific information in public comment, it is noted below. See the [meeting materials](#) for more information.

Note that a “yes” on sunset materials is a vote to remove and not relist the material.

§205.605(a) Nonsynthetics allowed.

If the listing is not renewed, the sunset date for this set of materials is October 21, 2017 unless otherwise noted.

- Acid, Alginic: **The subcommittee is proposing moving this to the allowed synthetics category.**
- Acids— Citric, Lactic
- Attapulgate
- Bentonite: Sunset June 27, 2017
- Calcium carbonate: Sunset June 27, 2017
- Calcium chloride
- Dairy cultures
- Diatomaceous earth
- Enzymes
- Flavors
- Kaolin
- Magnesium sulfate
- Nitrogen
- Oxygen
- Perlite
- Potassium chloride
- Potassium iodide
- Sodium bicarbonate
- Sodium carbonate
- Waxes (Carnauba): **The subcommittee will propose moving this to section 205.606, since it is an agricultural product.**
- Waxes (Wood rosin): **The subcommittee recommends a technical correction from wood resin to wood rosin, which is the substance in use.**
- Yeast

§205.605(b) Synthetics allowed are under review.

Sunset date for these materials is June 27, 2017 unless another date is noted.

- Acidified sodium chlorite: March 15, 2017
- Alginates
- Ammonium bicarbonate
- Ammonium carbonate

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- Ascorbic acid
 - Calcium citrate
 - Calcium hydroxide
 - Calcium phosphates: monobasic, dibasic, tribasic: The subcommittee requested a new Technical Report to help determine the effect of phosphates on human health. If the report, which may not be available for the Fall 2015 meeting, shows adverse human health effects, the subcommittee would likely propose in Spring 2016 a new review of all phosphates.
 - Carbon dioxide
 - Chlorine Materials: calcium hypochlorite, chlorine dioxide, sodium hypochlorite Ethylene
 - Ferrous sulfate
 - Glycerides: mono and di
 - Glycerin: **The subcommittee proposes removing Glycerin from 205.605(b) after rulemaking as proposed in April 2015 is complete, so that supplies are not interrupted.**
 - Hydrogen peroxide
 - Magnesium carbonate: **The committee recommends delisting this material, which is used only in 'made with organic' products, because it is not essential to organic production. Vote: 7 yes, 0 no, 0 abstain, 0 absent.**
 - Magnesium chloride
 - Magnesium stearate
 - Nutrient vitamins and minerals: The subcommittee plans to prepare a discussion document for the Spring 2016 meeting on options for annotations for this listing.
 - Ozone
 - Phosphoric acid
 - Potassium acid tartrate
 - Potassium carbonate
 - Potassium citrate
 - Potassium phosphate: The subcommittee requested a new Technical Report to help determine the effect of phosphates on human health. If the report, which may not be available for the Fall 2015 meeting, shows adverse human health effects, the subcommittee would likely propose in Spring 2016 a new review of all phosphates. Meanwhile, **the recommendation to remove potassium phosphate was: 3 yes, 2 no, 1 abstain, 1 absent.**
 - Sodium citrate: **If any alternatives are available, the subcommittee would like to hear about them in public comments.**
 - Sodium hydroxide
 - Sodium phosphates: The subcommittee requested a new Technical Report to help determine the effect of phosphates on human health. If the report, which may not be available for the Fall 2015 meeting, shows adverse human health effects, the subcommittee would likely propose in Spring 2016 a new review of all phosphates. **The subcommittee requests comments on which dairy foods use sodium phosphate as an ingredient or processing aid, and if the material is listed on the label or nutritional panel. Meanwhile, the recommendation to remove sodium phosphate was: 1 yes, 4 no, 1 abstain, 1 absent.**
 - Sulfur dioxide

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- Tocopherols: **The subcommittee is considering suggesting tocopherols be reclassified to section 205.605(a), and wants comments on how that change might impact organic producers.**
 - Xanthan gum

§205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic”.

Unless otherwise noted, the sunset date would be June 27, 2017.

- Casings
- Celery powder
- Chia (*Salvia hispanica* L.): **The subcommittee voted removal from the list, since organic chia seeds are commercially available.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
- Colors (proposed removals): **The subcommittee recommends removing 13 colors from the national list, since organic versions are commercially available:** Black/Purple Carrot Juice color; Blueberry Juice color; Carrot Juice color; Cherry Juice color; Chokeberry/Aronia Juice color; Elderberry Juice color; Grape Juice color; Grape Skin Extract color; Purple Potato juice color; Red radish Extract color; Saffron Extract color; Turmeric Extract color; Paprika color. Vote: 7 yes, 0 no, 0 abstain, 0 absent.
- Colors (proposed relisting): **The subcommittee supports relisting Beet Juice Extract Color, Blackcurrant Juice color, Pumpkin Juice color and Red Cabbage Extract color.** Vote: 0 yes, 7 no, 0 abstain, 0 absent.
- Dillweed oil: **The subcommittee recommends removing dillweed oil from the list, since sources of organic dillweed oil exist.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
- Fish oil: **Further information about the manufacturing and purification process, standards for fish oil purity, and voluntary standards on contaminant limits would be helpful.**
- Fructooligosaccharides
- Galangal, frozen: **The subcommittee recommends removing this material from the national list, since organic galangal appears to be available.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
- Gelatin
- Gums: Arabic, Carob bean, Guar, Locust bean
- Inulin-oligofructose enriched: **The subcommittee recommends removal from the National List, since organic inulin is available.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
- Kelp
- Konjac flour: **The subcommittee recommends removing konjac flour from the list, as incompatible with sustainable agriculture.** Vote: 4 yes, 3 no, 0 abstain, 0 absent.
- Lecithin—de-oiled: March 15, 2017.
- Lemongrass-frozen: **The subcommittee recommends removing frozen lemongrass from the list, since organic lemongrass is commercially available.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
- Orange pulp, dried: **The subcommittee recommends removing this from the list, since there are multiple suppliers of organic oranges, juice dried oranges, and orange pulp.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
- Orange Shellac - unbleached
- Pectin (non-amidated forms only)

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- Peppers (Chipotle chile): **The subcommittee recommends removing this from the list, since organic chipotle chile peppers are commercially available.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
 - Seaweed, Pacific kombu
 - Starches, Cornstarch (native), Sweet potato
 - Turkish bay leaves: **The subcommittee recommends removing this from the list, since organic bay leaves are commercially available.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.
 - Wakame seaweed (*Undaria pinnatifida*)
 - Whey protein concentrate: **The subcommittee recommends removing this from the list, since organic whey protein concentrate is commercially available.** Vote: 6 yes, 0 no, 0 abstain, 1 absent.

Proposals:

Reclassify Alginate Acid

The Handling Subcommittee proposes reclassification of Alginate Acid from §205.605(a) (non-synthetics allowed) to §205.605(b) (synthetics allowed) of the National List. Based on the current draft of the Classification of Materials document, **alginate acid would be classified as a synthetic.** Vote: 6 yes, 0 no, 0 abstain, 1 absent.

Reclassify Carnauba Wax

The subcommittee voted to **classify Carnauba Wax as agricultural and move its listing to section §205.606**, since it is extracted from certain palm trees and had never been classified as either agricultural or non-agricultural. Vote: 6 yes, 0 no, 0 abstain, 1 absent.

Ancillary Substances Permitted in Microorganisms and Dairy Cultures

Intentionally added to a formulated generic handling substance, ancillary substances do not have a technical or functional effect in the finished product. They are not considered part of the manufacturing process that has already been reviewed by the NOSB. Although some of these substances are removed or consumed in their processing, many may remain in the final product in tiny amounts. **Additional ancillary substances that fall within one of the functional classes below do not need to be reviewed further to be used. Any new functional class of ancillaries, however, would have to be petitioned.**

The subcommittee developed a chart of the functional classes of ancillary substances used with microorganisms and dairy cultures, along with examples of substances in each class, and voted to recommend it. The functional classes include: Anti-caking & anti-stick agents; carriers and fillers, agriculture or nonsynthetic; carriers and fillers, synthetic; preservatives; stabilizers; cryoprotectants used to freeze-dry (& freeze) microorganisms and dairy cultures; and substrate that may remain in final product. Vote: 7 yes, 0 no, 0 abstain, 0 absent.

Ancillary Substances for Pectin

As with ancillary substances for use with microorganisms and dairy cultures, **the subcommittee has developed a chart of ancillary substances used with pectin.** The functional classes include

stabilizers/standardizing agents and buffering agents, and the chart includes examples of substances in each class. **The subcommittee approved the chart.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.

Ancillary Substances for Yeast

As with ancillary substances for use with microorganisms and dairy cultures, **the subcommittee has developed a chart of ancillary substances used with yeast.** The functional classes include antioxidants, preservatives, emulsifiers, defoaming agents, and substrate that may remain in the final product. **The subcommittee approved the chart.** Vote: 7 yes, 0 no, 0 abstain, 0 absent.

Petitioned materials:

Sodium Lactate and Potassium Lactate

Sodium lactate and potassium lactate are used in meat processing as pathogen inhibitors. Although both of these materials have been on the list as allowed for use in organic handling, their initial inclusion was based on the fact that the components used to produce them were already on the list, rather than individual reviews of the resulting materials. **The subcommittee seeks information about other ways these materials are currently used, and if one is more commonly used than the other. They recommend listing in section 205.605(b) with the following annotation: for use as an antimicrobial agent only.** Classification as synthetic: 7 yes, 0 no, 0 abstain, 0 absent. Listing vote: 4 yes, 1 no, 2 abstain, 0 absent.

Flavors, Nonsynthetic

After review a petition from the Organic Trade Association requesting a similar annotation change, the **subcommittee is recommending the listing to be changed** from “Flavors, nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative” to **“Flavors – Non-synthetic flavors may be used when organic flavors are not commercially available. All flavors must be derived from organic or nonsynthetic sources only, and must not be produced using synthetic solvents and carrier systems or any artificial preservative.”** Vote: 7 yes, 0 no, 0 abstain, 0 absent.

Livestock Subcommittee

2017 Sunset Materials: If the Livestock Subcommittee is recommending a change in listing status or requesting specific information in public comment, it is noted below. See the [meeting materials](#) for more information.

Note that a "yes" on sunset materials is a vote to remove and not relist the material.

§205.603 Synthetic substances allowed for use in organic livestock production.

The sunset date June 27, 2017, unless otherwise noted.

- Alcohols: Ethanol
- Alcohols: Isopropanol
- Aspirin
- Atropine: June 24, 20017
- Biologics, Vaccines

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- Butorphanol
 - Chlorhexidine
 - Chlorine Materials: Calcium hypochlorite, chlorine dioxide, sodium hypochlorite
 - Electrolytes
 - Flunixin
 - Furosemide: **Because it is not seen as essential, the subcommittee is planning to remove this from the list of allowed materials unless they receive comments on why alternatives are not suitable.** Vote: 5 yes, 1 no, 0 abstain, 0 absent.
 - Glucose
 - Glycerin
 - Hydrogen peroxide
 - Iodine (listed in 205.603(a)(14) and 205.603(b)(2): **The subcommittee will propose a separate annotation permitting the use iodine made without NPEs only.**
 - Magnesium hydroxide
 - Magnesium sulfate
 - Oxytocin
 - Parasiticides: Fenbendazole: Sunset May 16, 2017. **The subcommittee intends to propose modifications to Sections 205.603 and 205.238 as they apply to use of fenbenzadole, including shortening the withholding period.**
 - Parasiticides: Ivermectin: **The subcommittee recommends removing this from the national list because it is harmful to human health and the environment, particularly dung-dwelling insects.** Vote: 5 yes, 1 no, 0 abstain, 2 absent.
 - Parasiticides: Moxidectin Sunset May 16, 2017. **The subcommittee recommends removing this from the national list.** Vote: 4 yes, 2 no, 0 abstain, 2 absent.
 - Peroxyacetic/Peracetic acid: **Comments sought on alternative materials and if this material is essential to organic livestock production.**
 - Phosphoric acid
 - Poloxalene
 - Tolazoline
 - Xylazine
 - Copper sulfate
 - Formic Acid: August 3, 2017
 - Lidocaine: **See the Discussion Document concerning the withdrawal period for this substance.**
 - Lime, hydrated
 - Mineral oil
 - Procaine: **See the Discussion Document concerning the withdrawal period for this substance.**
 - Sucrose octanoate esters
 - Methionine: Sunset October 2, 2017
 - Trace minerals
 - Vitamins
 - EPA List 4 - Inerts of Minimal Concern: The subcommittee proposes re-listing of EPA List 4 – Inerts of Minimal Concern, while working closely with the IWG and Crops Subcommittee to craft a proposed annotation change which would require inerts to be screening through the Safer Choices Program.

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- Excipients

§205.604 Prohibited nonsynthetic substances.

- Strychnine

Discussion Documents:

Annotation Changes for Lidocaine and Procaine

Based on new information received during Sunset Review of these local anesthetics, the subcommittee requested a Technical Report on Lidocaine and Procaine for use in organic livestock production. They request public comment on a possible annotation change to reduce the withholding period from 90 days to 8 days for slaughter stock, specifically under what circumstances is each drug used, how is it administered, and if the withholding period should be the same for every animal species, as well as the proposed withdrawal time of 8 days for slaughter stock and 7 days for dairy animals.

Annotation Change for Parasiticides

The subcommittee seeks to clear inherent contradictions and problems in the way the three permitted parasiticides (Fenbendazole, Moxidectin and Ivermectin) are listed and annotated. For example, use of the most environmentally benign option, Fenbendazole, requires the written order from a licensed veterinarian and the 90 day withdrawal times for organic milk production seem excessive.

Comment on the milk withholding period for any or all of these parasiticides, potential for use of these parasiticides on slaughter stock, as is done in Canada, organic status of fleece and wool from animals that may have been treated with parasiticides at some point, if use of moxidectin should be changed to allow both internal and external uses, and if veterinarian advice should be required for use of these parasiticides.

Materials Subcommittee

Proposals:

Research Priorities

The Materials Subcommittee compiled a list of research topics that would benefit the organic community. Topics include: Prevention of GMO Contamination: Evaluation of effectiveness; Prevention and management of parasites, systems review of successful models of livestock production nationwide, Continued research on the use of synthetic methionine in the context of a system approach, alternatives to chlorine materials; and alternatives to copper for disease and algae control.

Prevention Strategy Guidance for Excluded Methods

In April 2014, NOP requested that NOSB provide recommendations regarding best management practices for prevention of unintended genetically modified organism presence. The subcommittee prepared a document outlining prevention strategies and emphasizing the importance of ongoing education of producers and certifiers on where cross contamination might occur. Management practices for seed and crop production, livestock, and handling, as well as the role of certifiers and testing are included in the proposal.

Policy Development Subcommittee

Policy and Procedure Manual Revisions

The subcommittee updated the National Organic Standards Board Policy and Procedures Manual for public comment. Topics in the manual include the process for appointing NOSB members, responsibilities of officers, how work agendas are developed, ethics standards for NOSB members, descriptions of subcommittees and task forces, meeting procedures, and more.

Tips on Preparing Comments on Materials

Clearly indicate your position about the material, and explain your reasons for or against using relevant information and data (e.g., scientific, environmental, manufacturing, industry impact information, etc.). Keep in mind that materials allowed in organic production must be: (1) not harmful to human health or the environment, (2) necessary because of the unavailability of wholly non-synthetic alternatives, and (3) consistent and compatible with organic practices. In your comment use information that addresses these points. Focus on providing new information about a substance since its last NOSB review. Mention your continuing need for a substance or whether the substance is no longer needed or in demand.

If you have information about other methods or practices that could be effectively substituted for the material, mention those and include supporting information or data. Address whether any alternatives have a function and effect equivalent to or better than the allowed substance, and whether you want the substance to be allowed or removed from the National List. Unless the alternative is already on the National List, include the name and address of the manufacturer of the alternative. Include a copy or the specific source of any supportive literature, such as product or practice descriptions; performance and test data; reference standards; names and addresses of producers or handlers who have used the alternative under similar conditions and the date of use; or an itemized comparison of the function and effect of the proposed alternative(s) with substance under review.

For nonorganic agricultural substances on section 205.606, include current information regarding availability of and history of unavailability of an organic form of the substance in the appropriate form, quality, or quantity of the substance. Mention if there is a change in supply of organic forms of the substance or demand for the substance (i.e. is an allowance for the nonorganic form still needed), as well as any new information about alternative substances.

Preparing good comments is important, and requires attention to detail. Wolf, DiMatteo + Associates can help with comments, and more. Contact us today.

WHERE TO FIND WOLF, DIMATTEO + ASSOCIATES

September 16-19: Natural Products Expo East, Baltimore, MD. WD+A staff to attend.

October 9-11: IFOAM-Organics International Conference: Organic 3.0, Goesan County, South Korea. Katherine DiMatteo to speak.

October 17-20: American Holistic Veterinary Medical Association Annual Conference, Augusta, GA. Bill Wolf to attend.

October 26-29: National Organic Standards Board Meeting, Stowe, VT. Bill Wolf will attend.

November 6-8: Carolina Farm Stewardship Association Sustainable Agriculture Conference, Durham, NC. Bill Wolf to attend.