Spring 2026 NOSB Meeting

National Organic Standards Board

Spring 2026 NOSB Meeting
Comment by 11:59 pm ET Monday, May 4, 2026.

The NOSB Spring 2026 Meeting will be held virtually Tuesday, May 12, Wednesday, May 13 and Thursday, May 14, 2026. Links to listen to the public meeting are posted on this webpage.

Public Comment Webinars will be held on Tuesday, May 5 from Noon - 5:00 pm ET and Thursday, May 7 from Noon - 5:00 pm ET (access link here)

From the very beginning, with the passage of the *Organic Foods Production Act* in 1990, "organic" has meant "continuous improvement." The primary mechanism for continuous improvement in organic production is the high level of public involvement that comes from twice-annual meetings of the stakeholder board.

The second mechanism is the sunset process, which helps move synthetic substances out of organic production as the market invests in growing organic inputs and ingredients. Despite USDA's efforts to weaken the sunset process, the 5-year cycle of review of every synthetic substance currently used in organic production and processing offers us an opportunity to keep organic strong and strengthen any weaknesses.

For more detailed analysis on all upcoming issues, scroll down to the Table of Contents description and links. For quick copy and paste, use the text below to comment at Regulations.gov. Add a personal message about why this is important to you at the top, if possible!

Priority Issues will be listed here shortly

>> **Submit your own comments to the NOSB here —we encourage you to add a sentence or two at the beginning of the comments explaining why organic is important to you!**

Microplastics should not be broadcast into organic crops and orchards

Pear ester is a chemical kairomone (chemical signals) synthesized to be structurally and functionally identical to a volatile substance emitted by mature and ripening pears and other fruits. It attracts codling moths and is used in various ways to control them. Pear ester should be added to the National List with an annotation that describes its use and prohibits use of a product microencapsulated in plastic: "use of pear ester is limited to passive traps/monitors and not for use in microencapsulated formulations."

Beyond Pesticides' comments
Submit your own comment here

Chitosan is a material in search of a market in organic

It is a synthetic material that is not well characterized—and different forms have radically different uses. It is not necessary for organic production, and the NOSB has a Technical Review that summarizes many allowed substances for the petitioned use in wine made with organic grapes.

Limits should be placed on the use of chlorine in livestock drinking water. Chlorinated drinking water is unavoidable for anyone using public water supplies, but many livestock producers supply drinking water from wells, cisterns, or ponds. The NOSB should propose guidance and/or instructions for certifiers regarding the application of this use in the various situations faced by livestock producers, including “shocking” wells with high concentrations of chlorine. The NOSB must perform a comprehensive review of cleaning, disinfecting, and sanitizing materials that can support annotations for these materials on the National List.

Beyond Pesticides' comments
Submit your own comment here

E-Commerce must provide all information about organic products that is required by law.

E-Commerce must provide all information about organic products that is required by law. Probably every organic consumer who has shopped online has encountered product names, including the word “organic” or descriptions of products as “organic” or containing organic ingredients, and wondered whether that description is true. There is inconsistency between the requirements for a product offered for sale by a “brick and mortar” establishment and the requirements in eCommerce, and inconsistency provides an opportunity for fraud. The requirements for eCommerce should be brought into line with those for physical establishments. The NOSB must immediately identify any obstacles to eliminating this loophole and propose a rule change that will address them.

Beyond Pesticides' comments
Submit your own comment here

For all issues that will be discussed, see below.

Option for comments: Please fell free to copy our comments before clicking the "Submit your own comment here" link. After pasting comments into Regulations.gov, we encourage you to please consider personalizing and adding text before final submission!

Not sure how to use our suggested language to comment via Regulations.gov on your own?
Follow these simple steps:

1. Select the text in our comments (place your cursor before the first word in the text, then press and hold down the left mouse button and, without releasing the button, move the cursor to the end of the comments).
2. Copy the selected text by selecting the Ctrl and C keys simultaneously.
3. Click on this link to to open a new tab and in that tab, click on the "Comment" button.
4. Paste the comments you copied by selecting the Ctrl and V keys simultaneously.
5. Personalize your comments before entering your contact information and selecting "Continue".

Watch video tutorial for commenting at Regulations.gov. (Note—this instruction video is slightly

outdated, however will still show all of the basics to keep in mind when commenting. Stay tuned for a newer version!)

See the Regulations website's official "Tips for Submitting Effective Comments."

Spring 2026 NOSB Meeting

The Spring 2026 NOSB meeting dates have been announced and **public comments are due by May 4, 2026 at 11:59 pm ET**. Your comments and participation are critical to the integrity of the organic label.

Where: The meeting will be held in person in Omaha, NE and virtually. Online meeting access information is available here.

When: Tuesday, May 12, Wednesday May 13, and Thursday, May 14, 2026.

Written comments may be submitted through Regulations.gov until 11:59 pm ET Monday May 14, 2026.

The proposals of the National Organic Standards Board (NOSB), as a part of its ongoing review of practices and materials, are published for public comment. The public comment period will end on October 8, 2025. On this page, Beyond Pesticides will be providing the public with a listing and analysis of the issues under consideration of the Board on our website pages. You can view USDA's announcement of the NOSB's meeting and proposals here. Please see Beyond Pesticides' analysis below (and more coming soon).

Issues Before the NOSB for Spring 2026

Materials in the list below are either the subject of petitions or the subject of sunset review. Petitioned materials must have evidence summarized in the proposals that they meet the OFPA requirements of essentiality, no adverse effects on humans and the environment, and compatibility with organic practices. Sunset items are already on the National List, and being considered for delisting. They are subject to the same criteria, but are being considered under NOP's new rules.

The NOSB will vote on materials subject to sunset review at the Fall 2025 meeting.

To truly make an impact in the future of organic, Beyond Pesticides encourages you to:

- **Become familiar with the issues below;**
- **See previous comments submitted;**
- **Submit a public comment by May 4, 2026 11:59 pm ET (click here for guidelines!)**

See the Draft Agenda and meeting issues here

See the Full meeting materials and issues here

View issues that were before the Board at the January 2026 meeting

Table of Contents/Navigation to Beyond Pesticides' Comments and Summaries

NOSB Quick Links!

Draft Meeting Agenda	Take Action at Regulations.gov! (Comments Due May 4th, 2026 11:59 PM ET!)	See All Comments So Far	See Beyond Pesticides' Commenting Guidelines	See All Meeting Materials and Issues	The Organic Foods Production Act

Compliance Accreditation and Certification Subcommittee

Proposals

Residue Testing for a Global Supply Chain - Regulation Review

- **Beyond Pesticides' comments**
- **Submit your own comment here**
- **Background:** Residue testing is an essential tool for ensuring compliance with organic regulations. Preharvest residue testing can support evaluating an organic producer's efforts to prevent contamination, provide objective data when prohibited substance use is suspected, and monitor unavoidable residual environmental contamination levels. Postharvest residue testing can support the evaluation of contamination prevention in postharvest handling activities and across supply chains and provide objective data when prohibited substance use or when commingling or substituting conventional products is suspected. Residue testing does not substitute for the certification process and verification of compliance through an organic system plan review and annual inspection. However, it can support this process with objective results related to the presence of prohibited substances or the use of excluded methods. The new Strengthening Organic Enforcement (SOE) rule will make supply chain tracebacks and mass balances mandatory. Complete supply chain tracebacks will require many certifiers to work bidirectionally up and down the supply chain in cooperation with other certifying bodies.

- ### E-Commerce Labeling
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background:** The law requires that organic products are labeled with the organic seal, ingredients, and identification of the certifier. This labeling is not always visible to online consumers. The NOP must require full labels to be provided in online sales platforms.

    If the consumer wishes to verify the claim, the first step is generally to look for the organic seal and ingredient list on the label. The next step is to look for the name of the certifier. Country of origin is also relevant. Products in the digital marketplace often have specification sheets that provide detail product information. While that is one way to convey the information, it is important the organic products in the digital marketplace display in readable form the product labels that contain all the information required for product sales in brick and mortar stores.

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Crops Subcommittee

Proposals

- ### Pear Ester – petition
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background:** Pear ester is a chemical (Ethyl-2E,4Z-Decadienoate) synthesized to be structurally and
  - functionally identical to a volatile substance emitted by mature and ripening pears and other fruits. It is attractive to codling moths and is used in various ways to control them. Pear ester is described as a "kairomone," which is defined as "a chemical that is pertinent to the biology of

an organism (organism 1) and that when it contacts an individual of another species (Organism 2) evokes in the receiver a behavioural or physiological response that is adaptively favourable to organism 2 but not to organism 1. Our comments address both pear ester per se and delivery mechanisms. The Crops Subcommittee (CS) states, “Pear ester was previously allowed for use in organic crop production under the synthetic pheromone classification until its correct reclassification as a kairomone.” The petitioner would like pear ester to be added to the National List as a pheromone.

The CS should separate use of pear ester in traps from the use microencapsulated in sprays. We believe that the use in traps may be consistent with OFPA, but the use in sprays does not fit into any of the OFPA categories and poses unnecessary risks. We were unable to untangle results from the two uses with respect to effectiveness of controlling codling moths, but we encourage the CS to do so.

Sunset

2028 Sunsets 205.601 and 205.602

- Beyond Pesticides' comments
- **Submit your own comment here**

- **Chlorine materials**
  - **Calcium Hypochlorite**
    - **Beyond Pesticides’ comments**
    - **Submit your own comment here**
    - **Background**: As algicide, disinfectants, and sanitizer, including irrigation system cleaning
      systems. (2) Chlorine materials -For pre-harvest use, residual chlorine levels in the water in
      direct crop contact or as water from cleaning irrigation systems applied to soil must not
      exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except
      that chlorine products may be used in edible sprout production according to EPA label
      directions
  - **Chlorine dioxide**
    - **Beyond Pesticides’ comments**
    - **Submit your own comment here**
    - **Background**: As algicide, disinfectants, and sanitizer, including irrigation system cleaning
      systems. (2) Chlorine materials -For pre-harvest use, residual chlorine levels in the water in
      direct crop contact or as water from cleaning irrigation systems applied to soil must not
      exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except
      that chlorine products may be used in edible sprout production according to EPA label

directions

- **Hypochlorous acid**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: As algicide, disinfectants, and sanitizer, including irrigation system cleaning
    systems. (2) Chlorine materials -For pre-harvest use, residual chlorine levels in the water in
    direct crop contact or as water from cleaning irrigation systems applied to soil must not
    exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except
    that chlorine products may be used in edible sprout production according to EPA label
    directions

- **Sodium Hypochlorite**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: As algicide, disinfectants, and sanitizer, including irrigation system cleaning
    systems. (2) Chlorine materials -For pre-harvest use, residual chlorine levels in the water in
    direct crop contact or as water from cleaning irrigation systems applied to soil must not
    exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except
    that chlorine products may be used in edible sprout production according to EPA label
    directions

- **Copper sulfate**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: Copper sulfate is used as an algicide for rice crops, as the growth of algal matting in flooded fields can dislodge young seedlings. It is broadcast aerially into the flooded rice fields by plane. Rice farmers also spray copper sulfate to control a freshwater invertebrate, Triops longicaudatus, otherwise known as tadpole shrimp. Tadpole shrimp are only detrimental to very young seedlings, as their burrowing activities can disrupt the seedling roots and the first emerging leaves.Copper sulfate is a difficult substance to evaluate, as there appears to be broad consensus throughout the US, EU, and Canada that it is hazardous to both human health and the environment. Despite this, its use has repeatedly been extended in all three jurisdictions, as there isn't yet a viable organic alternative for copper in certain applications. The EU, Canada, and Japan all exclude copper sulfate for organic rice production but allow it as a fungicidal spray in organic orchards and vineyards.

- **Ozone gas**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: Ozone gas is a strong oxidant and works by oxidizing plant tissue and

bacterial membranes. It is used as an antimicrobial agent to clean irrigation lines. It has been used in Europe for more than 100 years to treat drinking water and it has been used in the United States to disinfect water and to oxidize color and taste contaminants in water. Ozone is found in the atmosphere at levels of 0.05 ppm but at levels of 0.5 ppm in cities with smog. Ozone has high acute toxicity. The use of ozone may be seriously detrimental to the health of humans who work with it, and those exposed indirectly, downwind of exposure.

- **Peracetic acid**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: Peracetic acid is currently approved for use in organic systems in two categories: as an equipment disinfectant as well as for control of fireblight bacteria. As an equipment cleaner, the substance is likely to pose few risks to human health and the environment due to the use being more strictly defined and the limited amounts that are necessary. This use is consistent with the principles of an organic system and falls under a category of specific allowed substances outlined in the *Organic Foods Production Act*. The use of peracetic acid for control of fireblight bacteria, however, is entirely inconsistent with organic principles and would likely present significant risks to human health and the environment, particularly soil organisms, which are highly important to organic production. Fireblight bacteria is a problem, particularly for fruit producers, but the use of a synthetic oxidizing agent to control it does not conform to any category of allowed synthetic inputs in the Organic Foods Production Act. The substance's effectiveness against fireblight and the associated use pattern are not clear, except to say that this use would necessitate its being sprayed into trees. Such broadcast applications would almost certainly result in detrimental effects to soil organisms and other wildlife as the material oxidized.
    For these reasons, we recommend continuing to allow peracetic acid to be used to clean equipment, but strongly oppose any further use of the material to control fireblight bacteria.

- **Magnesium oxide**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: Magnesium oxide is a relatively benign substance that has a wide range of uses. In this use, a small addition of magnesium oxide to a clay suspension agent prevents the settling of finely ground humates in liquid. The approval of magnesium oxide permits the use of natural humates in a liquid formulation.

- **EPA List 3 - Inerts of unknown toxicity**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: The annotation for EPA List 3 inerts limits their use in organic crop production to passive pheromone dispensers. The dispensers are generally manufactured as either tubes that contain pheromones or as an impregnated substance containing the pheromone. Passive pheromone dispensers may be used to trap and monitor insect populations, or they may be used for control of a pest through pheromone mating disruption. For trapping, the pheromone-impregnated dispenser is placed in a trap and the insect catch is monitored to determine when an economic threshold is reached, and the particular insect needs to be controlled. For pheromone mating disruption, the dispensers are tied to branches of trees or placed in such a manner that they are distributed throughout an area being covered by the pheromones. Throughout the

season, the design of the pheromone dispensers regulates the volatilization of pheromones into the air. Once in the air of the production area, the pheromones act to disrupt mating by interfering with the insect communication systems. A wide variety of insects, mostly Lepidoptera, can be managed with pheromones including codling moth, peach twig borer, peach crown borer, leafrollers, pink bullworm, boll weevil, gypsy moth, and others. While pheromones are very specific to individual insect species, other insecticides may be broader spectrum and affect more species than those requiring control and may have more detrimental environmental impacts.Other potential environmental issues relate to the number of pheromone dispensers containing List 3 inerts used per acre.

- **Calcium chloride**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: Calcium chloride is used to manage almost three dozen physiological disorders on crops. These include a reduction of cork spot on pears, bitter pit in apples, fruit cracking on developing figs, rain cracking in cherries, blossom end rot on tomatoes, and tipburn on Chinese cabbage (TAP lines 156-175). "Application of foliar calcium sprays relieves calcium physiological disorders because these are local deficiencies due to calcium transport problems. Local availability of calcium in new shoots and fruits can help solve the problem" (lines 197-98). Application of nonsynthetic calcium chloride in organic crop production is limited to foliar sprays to treat a physiological disorder associated with calcium uptake. This is a unique §205.602 material in that while not completely prohibited for use, the listing serves to annotate or the restrict use of this nonsynthetic. Since it is only allowed for a very specific use (foliar application to treat a calcium uptake disorder), Material Review Organizations list it with the restriction to reflect the very narrow permitted use. Certifiers are responsible for verifying that growers use it in a manner consistent with the restriction.

- **Rotenone**
  - **Beyond Pesticides' comments**
  - **Submit your own comment here**
  - **Background**: Rotenone is a potent non-synthetic botanical pesticide that is also used as a piscicide. Rotenone is commonly derived from the roots of various tropical plants native to Southeast Asia, South America, and East Africa. Historically, farmers have used this extract as a foliar spray to control pests on vegetables, berries, tree fruit, nuts, and forage crops. Rotenone was found to have adverse environmental and health impacts, a lack of essentiality, and an incompatibility with organic principles, and therefore, the NOSB unanimously passed a recommendation in October 2012 to add rotenone to the National List at §205.602 as a non-synthetic substance prohibited for use in organic crop production.

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Handling Subcommittee

Proposals

- **Chitosan**
  - Beyond Pesticides' comments

    - Submit your own comment here
    - **Background**: Chitosan is currently used in nonorganic wine making. wine makers use chitosan derived from Aspergillus niger as a clarifying agent. The US Food and Drug Administration (FDA) and the Alcohol and Tobacco Tax and Trade Bureau regulate the relevant legal uses of this substance (Draft 2026 TR). It is also referenced for allowed use in international organic programs such as the EU, UK, and Switzerland.

  Beyond Pesticides has repeatedly called for the NOSB to address products of fermentation. The board should identify issues relevant to materials decisions, including acceptable substrates and the origin of the fermenting organism. The petition does not address the origin of the Aspergillus niger, and we would oppose a product produced by a genetically engineered organism. The petition says that the fermentation uses "substrates approved for organic production," but the meaning of that phrase is unclear given the lack of guidance on fermentation.

  The petitioner has not presented a case showing that chitosan meets OFPA criteria for inclusion in the National List. The available TRs offer support for the HS proposal to deny the petition.

- **Sodium Bicarbonate Reclassification**
    - Beyond Pesticides' comments
    - Submit your own comment here
    - **Background**: During the 1995 NOSB meeting in Orlando, Florida, the NOSB voted to classify sodium bicarbonate as nonsynthetic. Prior to the Board's vote, a TAP report was conducted that briefly described the manufacturing process for sodium bicarbonate. Publicly available notes from the NOSB meeting do not contain any further details regarding the decision to classify sodium bicarbonate as nonsynthetic, or which forms are nonsynthetic. However, in recent rounds of sunset review (after the publication of NOP 5033-1) stakeholders have questioned the classification. The 2025 TR explains the various manufacturing processes of sodium bicarbonate and the resulting
      synthetic or nonsynthetic classification, as well as which forms are primarily available for commercial uses.

  Beyond Pesticides agrees that it makes sense to continue to allow the synthetic version that is currently allowed—not only because of the reduced impact on organic handlers sourcing the material, but also because sodium bicarbonate produced by processing of trona ores has a smaller,
  though non-trivial, environmental and health impact than that produced by the Solvay process.1 Like all substances derived from mined materials, however, manufacturing results in substantial environmental impacts—of both natural and synthetic forms. Consistency with organic principles suggests that organic production and handling should aim to minimized reliance on mined materials.

Sunset

- **2027 Sunsets 205.605 and 205.606**
    - Beyond Pesticides' comments
    - Submit your own comments here
- **Agar-agar**
    - Beyond Pesticides' comments

    - Submit your own comments here
    - **Background**: Agar (or agar-agar) may be nonsynthetic or synthetic. Nonsynthetic agar is made from Gellidium species of seaweed. It may be pretreated with an acid (vinegar or a mineral acid) to improve penetration. Synthetic agar is made from Graciliara species, which is subject to alkaline pretreatment to bring about a chemical change in the polysaccharides (L-galactose-6-sulfate groups are converted to 3,6-anhydro-L-galactose), producing agar with increased gel strength. The technical review lists a number of substitutes. If the NOSB decides to relist agar, it should relist only nonsynthetic agar is made from Gellidium species.

- **Animal enzymes**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**: The provided summary and the technical reviews—which address only rennet and egg whitelysozyme—are inadequate to support this listing. A more thorough examination is required to
      support relisting.

- **Calcium sulfate-mined**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**: Sufficient evidence has not been presented to support the use of calcium sulfate for all food uses. Therefore, the NOSB should consider renewing the listing of calcium sulfate with the annotation, "For use only as a coagulant in bean curd (tofu and similar products)," and only after reevaluating the environmental impacts.

- **Carageenan**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**: Carrageenan should be removed from the National List. The evidence summarized by the 2015 Technical Review came up with a verdict of mixed results on virtually every issue regarding food grade (high molecular weight) carrageenan. However, there is widespread agreement that poligeenan, which contaminates food grade carrageenan at unknown and uncontrollable levels, does cause adverse effects, including cancer. The production causes adverse environmental impacts. And it is not necessary –organic processors have been moving away from the use of carrageen because of consumer pressure since it was last considered for sunset. This is made more urgent by the fact that the National Organic Program ignored the recommendation of the NOSB in spring of 2012 to remove carrageenan from infant foods.

- **Glucano delta-lactone**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**: The current annotation— "production by the oxidation of D-glucose with bromine water is prohibited"—was added to ensure that glucono delta-lactone would be produced by microbial or enzymatic processes and hence be nonsynthetic. However, the 2016 technical review (TR) states, "There are many chemical methods of gluconic acid synthesis other than bromine water." Hence, the current annotation is not sufficient to ensure that the glucono delta-lactone (GDL) in use in organic processing is nonsynthetic. It also states that some enzymes used in the production of GDL may be genetically engineered. The NOSB should not relist GDL without an annotation change to correct these issues.

- **Tartaric acid**
  - Beyond Pesticides' comments
  - Submit your own comments here
  - **Background**: The HS should investigate whether tartaric acid from organic grape wine is available or would be available if this listing did not discourage its use. Since tartaric acid is a waste product from winemaking, its sale could provide additional revenue to organic vintners.

- **Cellulose**
  - Beyond Pesticides' comments
  - Submit your own comments here
  - **Background**: Cellulose may be derived from many sources, but the usual source is wood pulp. The production of wood pulp involves the clearing of natural ecosystems, which threatens biodiversity, high energy use, and emission of pollutants into the air and water. The 2016 technical review identified alternative materials and practices for all listed uses of cellulose. The NOSB should ask whether cellulose is necessary for organic production and whether alternatives are available that cause less damage in their production.

- **Chlorine materials**
  - Beyond Pesticides' comments
  - **Background**: Organic production and handling should be, to the extent possible, chlorine-free. The NOSB should perform a comprehensive review of all sanitizers and disinfectants to determine the needs of organic production and handling and the safest materials.

  - **Calcium hypochlorite**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**:
    - **Background**: Organic production and handling should be, to the extent possible, chlorine-free. The NOSB should perform a comprehensive review of all sanitizers and disinfectants to determine the needs of organic production and handling and the safest materials.
  - **Chlorine dioxide**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**: Organic production and handling should be, to the extent possible, chlorine-free. The NOSB should perform a comprehensive review of all sanitizers and disinfectants to determine the needs of organic production and handling and the safest materials.

  - **Hypochlous acid - generated from electrolyzed water**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**: Organic production and handling should be, to the extent possible, chlorine-free. The NOSB should perform a comprehensive review of all sanitizers and disinfectants to determine the needs of organic production and handling and the safest materials.

  - **Sodium hypochlorite**
    - Beyond Pesticides' comments
    - Submit your own comments here
    - **Background**: Organic production and handling should be, to the extent possible,

chlorine-free. The NOSB should perform a comprehensive review of all sanitizers and disinfectants to determine the needs of organic production and handling and the safest materials.

- **Potassium hydroxide**
  - Beyond Pesticides' comments
  - Submit your own comments here
  - **Background**: Potassium hydroxide is a hazardous material, possibly (with sodium hydroxide) one of the most hazardous and toxic on the National List. The 2016 TR does not seem to have resolved the issue of the essentiality for potassium hydroxide in processing peaches, but the essentiality of other allowed uses also needs to be examined. The NOSB must address the following questions: For what purposes is potassium hydroxide used in organic processing? What are the alternatives for those uses? Is further annotation necessary?

- **Potassium lactate**
  - Beyond Pesticides' comments
  - Submit your own comments here
  - **Background**: The use of sodium lactate and potassium lactate for the listed use is prohibited by organic regulations at §205.600(b)(4). Potassium lactate and sodium lactate are unnecessary. They are synthetic chemicals used for purposes not allowed in organic processing. Therefore, they should not be relisted.
- **Silicon dioxide**
  - Beyond Pesticides' comments
  - Submit your own comments here
  - **Background**: In 2011, the NOSB voted to annotate the listing to recognize and encourage the use of organic rice hulls as an alternative for most uses of silicon dioxide. The NOSB recommended the following annotation: "Allowed for use as a defoamer. May be used in other applications when non-synthetic alternatives are not commercially available.'' The NOP proposed and put into regulation instead this annotation: "Permitted as a defoamer. Allowed for other uses when organic rice hulls are not commercially available." The annotation in the final rule is less restrictive than the NOSB recommendation, and therefore allows the use of the synthetic silicon dioxide in cases where there is a nonsynthetic alternative other than organic rice hulls," which is contrary to OFPA §6517(d)(2). According to the 2010 Technical Review (TR), other plant materials may be the basis for biogenic silica products. Therefore, the NOSB should revisit the annotation to determine whether it should be changed to the language as originally passed by the NOSB.

- **Sodium lactate**
  - Beyond Pesticides' comments
  - Submit your own comments here
  - **Background**: The use of sodium lactate and potassium lactate for the listed use is prohibited by organic regulations at §205.600(b)(4). Potassium lactate and sodium lactate are unnecessary. They are synthetic chemicals used for purposes not allowed in organic processing. Therefore, they should not be relisted.

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Livestock Subcommittee

Proposals

- **Chlorine Materials**
  - **See Beyond Pesticides' comments here**
  - **Attachment to LS chlorine proposal BP comments on sanitizers.final**
  - **Submit your own comments here**
  - **Background**: In September 2024, the National Organic Program received a petition from the Organic Materials Review Institute (OMRI) requesting an amendment to the annotation for Chlorine materials at § 205.603(a)(10) to clarify whether they are allowed for direct treatment of livestock drinking water. The petitioner stated that some entities in the organic industry have established policies that are based on the belief that the National List at § 205.603(a)(10) allows for direct livestock drinking water treatments as long as the final drinking water meets Safe Drinking Water Act (SDWA) standards. Other entities in the industry interpret the § 205.603(a)(10) annotation as one that limits the use of chlorine materials to disinfection of facilities and equipment.

Sunset

2027 Sunsets 205.603

  - Beyond Pesticides' comments
  - Submit your own comment here

- **Activated Charcoal**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: Activated charcoal is used as the preferred therapeutic treatment as needed for treatment of suspected poisoning by plants or moldy silage. Activated charcoal removes toxic chemicals by adsorption. It is then excreted. In view of this action, activated charcoal should be annotated to include proper handling of manure after treatment.
- **Calcium borgluconate**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: These calculations in the technical review suggest that a withdrawal period should be established. In addition, boron, boric acid, and borates have recently been classified as reproductive and developmental toxicants.
- **Calcium propionate**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: A number of concerns were raised by the Technical Advisory Panel in 2002. They need to beaddressed by a new technical review before the NOSB votes on whether to relist calcium propionate in the Fall.
- **Cholorine materials**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: While the uses of disinfectants vary so that no one method or material is

likely to be effective in all cases, there are numerous alternative methods and materials that should allow organic producers and handlers to avoid the use of the most toxic materials—in particular, those containing chlorine. Regarding alternative materials for teat dips, the iodine technical review says, “The available information suggests that commercial antimicrobial products containing oxidizing chemicals (e.g., sodium chlorite, hypochlorite, iodophor), natural products composed of organic acids (e.g., lactic acid), and homemade products using vinegar (i.e., acetic acid) as the active ingredient may all be equally effective teat dip treatments.” The active ingredients identified by EPA’s Design for the Environment are safer and effective alternatives.

- **Kaolin pectin**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: Kaolin pectin is used as an adsorbent, antidiarrheal, and gut protectant in organic livestock production. There has been recent discussion of pectin by the NOSB as it is used in organic food processing, particularly relating to its classification. If pectin is non-amidated, then kaolin pectin is nonsynthetic and should not be listed.
- **Mineral oil**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - There are issues to address before the relisting vote in the Fall. The FDA does not approve of this use, so how can it be allowed by NOP? Can the mineral oil listing be annotated to require a high degree of purity? Can vegetable oil be substituted?
- **Nutritive supplements**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Livestock feed should rarely need supplementation with synthetic vitamins, so it should be made clear that all synthetic vitamins, minerals, and electrolytes may be provided only as medical treatments.
- **Propylene Glycol**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Propylene glycol is allowed for treating ketosis. A recent technical review is not available, but one respected organic veterinarian gives a number of suggestions for prevention (maintaining a high-energy diet before calving, including dry long-stemmed hay) and treatment (glucose IV, homeopathic lycopodium, molasses, and Wellness Tonic containing apple cider vinegar and aloe vera, with tinctures of rose hips, dandelion root and plantain).
- **Sodium chlorite**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Acidified sodium chlorite is used as a teat dip. According to the technical review, “The available information suggests that commercial antimicrobial products containing oxidizing chemicals (e.g., sodium chlorite, hypochlorite, iodophor), natural products composed of organic acids (e.g., lactic acid), and homemade products using vinegar (i.e., acetic acid) as the active ingredient may all be equally effective teat dip treatments.” Organic production should move away from hazardous chlorine products.
- **Zinc sulfate**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Zinc sulfate is used as a walk-through footbath, with spent liquid spread on fields with manure. If the NOSB decides to relist zinc sulfate, it should recommend an additional

annotation comparable to the annotation for coppers in crops, requiring that zinc sulfate must be used and disposed of in a manner that minimizes accumulation in the soil, as shown by routine soil testing.

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Materials Subcommittee

Proposals

- **Research Priorities 2026**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: The National Organic Standards Board (NOSB) presents an annual list of research priorities for organic food and agriculture, a process originally established by the Board in 2012. The NOSB requests that integrated research be undertaken with consideration of the whole farm system, recognizing the interplay of agroecology, the surrounding environment, and both native and farmed species of plants and animals. As part of this year's process, the Livestock, Crops, and Handling Subcommittee have made an effort to categorize and differentiate highest priority topics from ongoing topics.

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Policy Development Subcommittee

Proposals

- **Policy and Procedures Manual Revision**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: The Policy and Procedures Manual (PPM) was established to assist the National Organic Standards Board (NOSB) in the implementation of its duties under the Organic Foods Production Act (OFPA), and the USDA Organic Regulations (7 CFR Part 205). It contains operating procedures and policies for the NOSB. During the period since the last revision (April 2024), the Policy Development Subcommittee has discussed changes to address actions the board can take when board members do not participate in meetings and how to ensure the highest level of trust and transparency in our process when evaluating new substances for inclusion on the National List.

Discussion

- **Discussion Document: Sunset review efficiency**
  - Beyond Pesticides' comments
  - Submit your own comment here
  - Background: The NOSB dedicates significant time at each Fall meeting to reviewing and voting on substances scheduled for sunset. Numerous National List substances have been reviewed by the NOSB several times and have received unanimous support for relisting.

The NOSB has an ongoing obligation to review these materials and determine whether they continue to meet National List criteria, particularly in light of any new information. In recent years, the NOSB's sunset process has included subcommittee discussions, full Board discussion at the Spring meeting, further subcommittee discussions, and a second full Board discussion and vote at the Fall meeting

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