



Sunset 2016 Review NOSB Final Review Crops Substances April 2015

As part of the National List Sunset Review process, the NOSB has evaluated the need for the continued allowance for or prohibition of the following substances for use in organic crop production.

Ferric phosphate

Reference: **7 CFR 205.601** As a synthetic substance allowed for use in organic crop production

(h) As slug or snail bait. Ferric phosphate (CAS # 10045 - 86 - 0).

Technical Report: [07/2004](#); [6/2010](#); [07/2012 supplemental TR](#)

Petition(s): [05/2003](#); [07/2009 petition to remove](#)

Past NOSB Actions: [03/2005](#) - NOSB review and recommendation for addition to the National List;

[04/2010](#) - Recommendation to renew; [10/2012](#) - NOSB recommendation on petition to remove.

Recent Regulatory Background: Added to National List effective 09/12/06 [71 FR 53299](#); Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

Sunset Date: 9/12/2016

Subcommittee Review

NOSB Review

The NOSB reviewed the points in favor of renewing the substance as well as those in favor of removal from the list. Those in favor of renewing (voting no on removal) pointed out that the substance itself has not been found to be harmful to human health or the environment, is the only effective control for mollusks, and should be reviewed on its own merits regardless of what other ingredients are formulated with it. Those in favor of removal brought out that the inert ingredient EDTA is not safe in their opinion, and that there are alternative cultural practices and control measures. The majority of the NOSB concluded that it meets the Criteria in the OFPA and should be renewed.

Motion to remove Ferric Phosphate (CAS # 10045–86–0) from 205.601(h)

Motion by: Carmela Beck

Seconded by: Colehour Bondera

Yes: 3 No: 11 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion failed. NOSB completed its sunset review.

Hydrogen chloride

Reference: **7 CFR 205.601** As a synthetic substance allowed for use in organic crop production

(n) Seed preparations. Hydrogen chloride (CAS # 7647 – 01 - 0) - for delinting cotton seed for planting.



Technical Report: [2003 TAP: 5/2014 Limited Scope TR](#)

Petition(s): [10/2002](#)

Past NOSB Actions: [05/2004](#) - NOSB review and recommendation for addition to the National List; [11/2009](#) - Recommendation to renew

Regulatory Background: Added to National List effective 09/12/06 [71 FR 53299](#); Sunset renewal notice published 08/03/2011 [76 FR 46595](#)

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There are very few sources of cotton seed available to organic cotton farmers and all of them use an acid de-linting process to provide clean seed for planting. This issue also has a significant impact on cotton producers in other countries where there are also limited sources of seed. While there is continuing concern over having a very corrosive acid on the National List, it was acknowledged that an alternative mechanical de-linting process is not available yet and so the NOSB recommends renewing this on the National List because it is essential to the production of organic cotton.

Motion to remove Hydrogen Chloride, CAS # 7647-01-0, from §205.601(n)

Motion by: Francis Thicke

Seconded by: Harold Austin

Yes: 1 No: 13 Abstain: 0 Recuse: 0 Absent: 1

Outcome: Motion failed. NOSB completed its sunset review.