

**Formal Recommendation**  
**From: National Organic Standards Board (NOSB)**  
**To: the National Organic Program (NOP)**

**Date:** October 29, 2015

**Subject:** Petition to add sulfuric acid to §205.601

**NOSB Chair:** Jean Richardson

**The NOSB hereby recommends to the NOP the following:**

Rulemaking Action: None. Motion failed

**Statement of the Recommendation:**

Sulfuric acid was petitioned for use as a solubilizing agent to make micronutrients more available for plant uptake. The sulfuric acid would solubilize mineral oxides of micronutrients, which would then be chelated with amino acid complexes, making them more plant-available.

The Crops Subcommittee did not think it was necessary to add sulfuric acid, a very corrosive strong acid, to §205.601 to make micronutrients more plant-available. Synthetic micronutrients are already allowed under §205.601. In organic production systems, micronutrient availability is part of a biological process. On a vote of 5 to 0, the Crops Subcommittee voted to not list sulfuric acid, as petitioned at §205.601.

**Rationale Supporting Recommendation (including consistency with OFPA and Organic Regulations):**

The Crops Subcommittee had concerns that the process of treating micronutrients with sulfuric acid, as petitioned, would produce forms of micronutrients that are highly refined and designed to spoon-feed plants in ways that circumvent the natural soil biological processes central to organic farming. The Subcommittee thought that was not consistent with the principles of organic farming.

**NOSB Vote:**

Motion to classify sulfuric acid as petitioned as synthetic

Motion by: Francis Thicke

Seconded by: Harold Austin

Yes: 14 No: 0 Abstain: 0 Absent: 0 Recuse: 0

**Outcome:** Classification motion passed

Motion to list sulfuric acid, as petitioned, at §205.601.

Motion by: Francis Thicke

Seconded by: Harold Austin

Yes: 0 No: 14 Abstain: 0 Absent: 0 Recuse: 0

**Outcome:** Listing motion failed