

**National Organic Standards Board**  
**Crops Subcommittee Petitioned Material Discussion Document**  
**Ammonia Extract**  
**August 4, 2020**

**Summary of Petition:**

The NOSB Crops Subcommittee has determined the petition by TRUE Organic Products, Inc., submitted April 14, 2020 to be sufficient and has requested a third-party technical review to aid the Subcommittee's deliberations. The petitioner seeks to prohibit nonsynthetic ammonia extracts for use in organic crop production. Specifically, the petition claims that both synthetic and naturally derived forms of ammonia can be synthesized or derived and applied to soils in order to meet the nitrogen demand of plants. Since nonsynthetic sources of ammonia is not currently permitted by Certifiers and Material Review Organizations (but also not explicitly prohibited) in organic production and because such use of ammonia is caustic, lowers soil pH, is known to decrease soil biotic activity, and bypasses other soil based sources of nitrogen, the petitioner seeks to list ammonia extract on §205.602 of the National List as a prohibited nonsynthetic substance.

**Questions:**

The Crops Subcommittee seeks input from the technical review process and from stakeholders to answer the following questions:

1. Is it difficult to distinguish between ammonia derived from natural and synthetic sources (the petitioner claims it is difficult and can only be determined by assaying the N isotopes)? In addressing this question please consider the distinction between ease of chemical analysis in a laboratory and the realities of distinguishing between ammonia sources in a commercial setting where fertilizer blending is common.
2. What are the impacts of ammonia extract application on soil organic matter content, the microbiome of the soil, soil faunal diversity and other soil "health" indicators?
3. Is the description presented in the petition defining ammonia products sufficiently precise to classify all ammonia-based products? If not, provide a more precise and inclusive over-arching definition.
4. Are there any other issues with ammonia use in organic crop production that the NOSB should be aware of?

**Subcommittee Vote:**

Motion to accept the petitioned material discussion document on ammonia extract

Motion by: Dave Mortensen

Seconded by: Jerry D'Amore

Yes: 6 No: 0 Abstain: 0 Absent: 2 Recuse: 0

**Approved by Jesse Buie, Crop Subcommittee Chair, to transmit to NOP August 4, 2020**