

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

Date: October 25, 2019

Subject: NOSB Research Priorities 2019

NOSB Chair: Harriet Behar

The NOSB hereby recommends to the NOP the following:

Rulemaking Action:

Guidance Statement:

Other: X

Statement of the Recommendation:

The organic industry, consisting of farmers, ranchers, processors, brokers, distributors, scientists, environmentalists, retailers, consumers and more, all support expanded funding for organic research. The NOSB is in the unique position of being able to see knowledge gaps in all types of organic production, and this list of research priorities represents the wide range of current issues the NOSB would like to see addressed by the research community. The National Organic Standards Board 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.

Livestock

1. Evaluation of methionine in the context of a system approach in organic poultry production.
2. Prevention and management of parasites, examining breeds, geographical differences, alternative treatments, and pasture species.
3. Organic livestock breeding for animals adapted to outdoor life and living vegetation.

Crops

1. Examination of decomposition rates, the effects of residues on soil biology, and the factors that affect the breakdown of biodegradable biobased mulch film.
2. Conduct whole farm ecosystem service assessments to determine the economic, social, and environmental impact of farming systems choices.
3. Organic no-till practices for diverse climates, crops, and soil types.
4. Develop cover cropping practices that come closer to meeting the annual fertility demands of commonly grown organic crops.

5. Development of systems-based plant disease management strategies are needed to address existing and emerging plant disease threats.
6. The demand for organic nursery stock far exceeds the supply. Research is needed to identify the barriers to expanding this market, then develop and assess organic methods for meeting the growing demand for organically grown nursery stock.
7. Strategies for the prevention, management, and control of invasive insects.
8. Factors impacting organic crop nutrition, and organic/conventional nutrition comparisons.
9. Side-by-side trials of organic synthetic materials, natural materials, and cultural methods, with a request for collaboration with the IR4 project.

Food Handling and Processing

1. Comparison of alternatives to chlorine materials in processing: impact mitigation, best management practices, and potential for chlorine absorption by produce.
2. Production of celery for celery powder yielding nitrates sufficient for cured meat applications, and investigation of agriculturally derived alternatives.
3. Suitable alternatives to BPA (Bisphenol-A) for linings of cans used for various products.

Coexistence with GE and Organic Crops

1. Outcome of genetically engineered (GMO/GE) material in organic compost.
2. Evaluation of public germplasm collections of at-risk crops for the presence of GE traits, and ways to mitigate small amounts of unwanted genetic material in breeding lines.
3. Develop then implement methods of assessing the genetic integrity of crops at risk in order to quantify the current state of the organic and conventionally produced non-GMO seed.
4. Techniques for preventing adventitious presence of GE material in organic crops, and evaluation of the effectiveness of current prevention strategies.
5. Testing for fraud by developing and implementing new technologies and practices.

General

1. Examination of the factors influencing access to organically produced foods.
2. Production and yield barriers to transitioning to organic production to help growers successfully complete the transition.

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

Since adopting its Research Priorities Framework in 2012, the National Organic Standards Board or NOSB, a Federal Advisory Committee, has presented a list of research priorities for organic food and agriculture. Research needs are prioritized along the following criteria: 1) persistent and chronic, 2) challenging, 3) controversial, 4) nebulous, 5) lacking in primary research, and 6) relevant to assessing the need for alternative cultural, biological, and mechanical methods to materials on the National List. The NOSB encourages collaboration with and between laboratories, federal agencies, universities, foundations and organizations, business interests, organic farmers, and the entire organic community to seek solutions to pressing issues in organic agriculture and processing/handling.

NOSB Vote:

Motion to adopt the proposal on 2019 NOSB Research Priorities

Motion by: Dave Mortensen

Seconded by: Lisa de Lima

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

Motion Passed

USDA National Organic Standards Board Research Priorities, 2019

Executive Summary

Overall: The National Organic Standards Board (NOSB) presents an annual list of research priorities for organic food and agriculture. 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.

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8. Factors impacting organic crop nutrition, and organic/conventional nutrition comparisons.
9. Side-by-side trials of organic synthetic materials, natural materials, and cultural methods, with a request for collaboration with the IR4 project.

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**National Organic Standards Board
Materials Subcommittee Proposal
2019 Research Priorities
August 13, 2019**

INTRODUCTION

The National Organic Standards Board (NOSB) presents an annual list of research priorities for organic food and agriculture. The NOSB's Livestock, Crops, Handling, and Materials/GMO Subcommittees propose the priorities at the fall board meeting and reflect both written and oral public comments received by the Board. The topics listed below are the 2019 priorities.

BACKGROUND

The list of priorities is revisited each year by the NOSB. The list is made meaningful by input through the written and oral public comments shared with the Board, through the expertise of the Board itself and through interactions throughout the year with those engaged in some dimension of the organic farm to fork continuum. When the NOSB has determined that a priority area has been sufficiently addressed, it is removed from the list of priorities. Priorities are also edited each year to more accurately reflect the existing need for new knowledge. Four new research priorities were added in 2019.

The NOSB encourages collaboration with and between laboratories, federal agencies, universities, foundations and organizations, business interests, organic farmers, and the entire organic community to seek solutions to pressing issues in organic agriculture and processing/handling.

PROPOSAL: 2019 RESEARCH PRIORITIES

The NOSB encourages integrated, whole farm research into the following areas:

Livestock

1. Evaluation of Methionine in the Context of a System Approach in Organic Poultry Production

Methionine is an essential amino acid for poultry. Prior to the 1950's, poultry and pigs were fed a plant and meat-based diet without synthetic amino acids such as methionine. One former NOSB member stated, in §205.237(5) (b), "We have seemingly made vegetarians out of poultry and pigs". As the organic community moves toward reducing, removing, or providing additional annotations to synthetic methionine in the diets of poultry, a heightened need exists for the organic community to rally around omnivore producers to assist in marshaling our collective efforts in finding viable alternatives to synthetic methionine and to help find approaches for making them more commercially available.

Continued research on the use of synthetic methionine in the context of a systems approach (nutrition, genetic selection, management practices, etc.) is consistent with the NOSB unanimous resolution passed at the La Jolla, California, Spring 2015 board meeting. A systems approach that includes industry and independent research by USDA/ARS, on farms, and by agricultural land grant universities is needed for (1) evaluation of the merits of natural alternative sources of methionine such as herbal methionine, high methionine corn, and corn gluten meal in organic poultry production systems; (2) evaluation of poultry breeds selection that could be adaptive to existing organic production systems – inclusive of breeds being able to adequately perform on less methionine; and (3) assessment of management practices for improving existing organic poultry welfare under different conditions. Research findings and collaborations under various climates, housing types, geographical regions, and countries should be noted and researched, where applicable. Certainly, the fruition of these types of research topics could take years to achieve the expressed NOSB resolution; however, an aggressive and/or heightened

research focus could lead to findings that can positively impact the organic poultry industry and the organic brand. The continued focus on methionine with a systems approach is imperative and necessary.

The key research areas should include the efficacy and viability of alternatives such as: herbal methionine, corn gluten meal, potato meal, fishmeal, animal by-products, and other non-plant materials. Additional research on the more promising alternatives to bring them into commercial production is also encouraged. Additionally, management practices impacting the flock's demand for methionine should be included, such as flock management practices, access to pasture, and pasture management.

2. Prevention and Management of Parasites

Livestock production places large numbers of cattle, sheep, goats, poultry etc. into relatively close contact with each other on fields and in barns. Organic production does not allow antibiotic use and requires that livestock be raised in a manner which approximates the animal's natural behavior. The organic farmer can use synthetic parasiticides in an emergency but not prophylactically. Synthetic parasiticides have many limitations. Even if prophylactic treatment with parasiticides were possible, it is clear that parasite immunity to chemical control will inevitably occur. Thus, prevention of parasites is critical.

The research question on prevention and management of parasites must be systems based. What farm systems, animal breeds, herd or flock management systems have shown the best results with parasite control over the last twenty years? What regional differences are there in the US in parasite prevention? Are there specific herbal, biodynamic, or other alternative treatments that have been proven to work over time? What are the parasite-resistant breeds? Are there plant species in pastures and scrublands that could be incorporated into the annual grazing system to reduce the spread of parasites or to provide prevention through the flora, fauna, and minerals ingested? Which pasture management systems appear to be best for parasite prevention in various parts of the country? Are pasture mixes being developed that include plants known to prevent parasites in various breeds?

3. Organic Livestock Breeding

Organic rules require livestock products originate from animals that are not confined and are adapted to outdoor living as well as obtaining feed from living vegetation. A current FAO report states that globally one third of pigs, half of all egg layers, two thirds of milk animals, and three quarters of meat chickens are produced with breeds more suited to confinement or "industrial" production systems than a typical organic farm or ranch. Similar to plant breeding, the organic community sees a great need for regionally-adapted and publicly available livestock breeds that can thrive in organic systems.

Heritage, native regional breeds, and breeds used in the EU and other areas of the world that are typically more adapted to organic systems are still present but in small numbers. Increased research on the breeding, production needs, and improvement of these breeds is needed. Traits for good conversion rates from grazing to milk or meat, meeting consumer expectations for quality, as well as having the constitution and temperament to thrive outdoors would increase both the profitability and resiliency of organic livestock operations. Animal breeds that may have immunity to a variety of diseases and parasites would be useful traits to research and incorporate in a breeding program.

Crops

1. Biodegradable Bio-based Mulch Film

This type of mulch film was recently approved by the NOSB but did not include a specific percentage of bio-based components it must contain. In 2015, NOP issued a Policy Memo¹ that states that certifiers and material organizations should review biodegradable bio-based mulch film products to verify that all of the polymer feedstocks are bio-based. This requirement makes bio-based mulches unavailable to organic producers due to the petroleum-based polymers in these mulch films. In order to provide a recommendation to the NOP addressing the presence of petroleum-based polymers in these mulches, the answers to the following questions would be useful to develop more clarity on mulch films and possibly develop an additional annotation to address any concerns:

- How rapidly do these mulches fully decompose, to what extent does cropping system, soil type, and climate mediate decomposition rates, and does the percentage of the polymers in the mulch film affect the decomposition rate? Are there metabolites of these mulches that do not fully decompose?
- Do breakdown byproducts influence the community ecology and ecosystem function of soils, plants, and the livestock that graze on crops grown in these soils?
- As fragments degrade, do they pose a problem to terrestrial and aquatic wildlife?
- Do the residues of these films accumulate after repeated use?
- Are the testing protocols in place to insure decomposition standards?

2. Ecosystem service provisioning and biodiversity of organic systems (New in 2019)

How do organic systems impact ecosystem service provisioning, both on-farm and through the materials and inputs sourced and used for production? For example, what impact does ocean harvesting of seaweed for use as a fertilizer have on ecosystem health and service provisioning? Can farm-mapping be performed to quantify the impact of the location of a farm (in a broader landscape) and the arrangement of fields and non-crop habitat to enhance biodiversity and ecosystem service provisioning?

3. Organic No-Till

Organic no-till, using a terminated cover crop for in-place mulching, can increase soil health and provide for increased biodiversity. Organic no-till preserves and builds soil organic matter, conserves soil moisture, reduces soil erosion, and requires less fuel and labor than standard organic row crop farming. There can also be some challenges from organic no-till using a cover crop, such as occasional insect infestation associated with the cover crop.

Even though this killed-in-place mulch practice has been used for more than a decade, widespread adoption has not occurred. Increased research is needed to develop organic no-till systems that function for a wide variety of crops in diverse climates and soil types. Annual crops such as commodity row crops and specialty crops, as well as perennial crops such as tree fruits, berries, and grapes would all benefit from these organic no-till practices. Research areas that could be covered include:

- Development of plant varieties that have specific characteristics, such as early ripening, to aid in the effectiveness and practicality of organic no-till.
- What combination of mulch crops and cultural systems sustain crop yields, provide soil health benefits, and suppress weeds?
- How does organic no-till influence pest, weed, and disease management?
- What specific insect problems can be caused or exacerbated by cover crops used as mulches, and how can those problems best be managed?
- In perennial cropping systems, such as fruits, what are the benefits or drawbacks of using this

¹ [Policy Memo 15-1](#)

mulching system on weed, pest, and disease management, as well as soil fertility?

- What are the biodiversity benefits to these living and/or killed mulches, and how does this contribute to pest, weed, and disease management?
- Does this system affect the nutrient balance of the soil and subsequent fertilization practices, including use of outside inputs?
- Based on the improved soil health, when there is less soil disturbance and more plant decomposition resulting in higher organic matter, how does this system affect soil microbial life and nutrient availability, and does this then result in crops that are less susceptible to disease and pests?

Finally, organic farmers use whole-farm planning when deciding what will be done in each of their fields. Research that assesses the ecosystem benefits of reducing tillage in patches (field-level) across a farm is also needed. For example, the relative benefits of reducing tillage are greater in areas prone to surface water runoff. Research is needed to “inform” where reduced tillage practices are likely to have their greatest impact.

4. Managing Cover Crops for On-Farm Fertility (*New in 2019*)

Growing cover crops and green manures is a foundational practice on many organic farms. In addition to conserving soil, increasing water holding capacity, and providing weed suppression, cover crops can supply important plant nutrients and increase soil organic matter. As farmers seek to grow their own fertility, more research is needed on the efficacy of relying exclusively or almost exclusively on cover crops to meet production needs. At present, there is inadequate data on the various nutrient benefits of different cover crop mixes and how those benefits vary according to species mix, mowing practices, tillage regimes, and subsequent planting time of the cash crops. This topic asks researchers to examine farm fertility needs using cover crops as the sole or primary form of nutrient delivery.

5. Disease Management

Disease management in organic fruit and vegetable production relies on a systems approach to succeed, but even with current systems plans in place, growers frequently struggle to manage commonly occurring blights and citrus greening. The NOSB underscores the need for systems research that addresses solutions to these and related diseases that are workable for farmers, that reduces adverse health effects on farmers and fieldworkers, and that also limits adverse effects on the soil and water in which the crops grow. To this end, we call for systems research that identifies disease resistant material while at the same time identifying biological controls that limit the use of copper-based compounds where possible.

Specifically, targeted research is needed to identify management practices and less toxic alternative materials for a wide range of crops. More research is needed on many of the crop/disease combinations, including:

- Comprehensive, systems-based approaches for managing individual crops in a way that decreases the need for copper-based materials, including researching crop rotations, sanitation practices, plant spacing, and other factors that influence disease.
- Breeding plants that are resistant to the diseases that copper controls.
- Developing alternative formulations of materials containing copper so that the amount of elemental copper is reduced.
- Developing biological agents that work on the same diseases that copper is now used on.
- Evaluating plant nutritional strategies to mitigate the impacts of plant diseases.
- Particular research on scum and algae control in rice and whether sodium carbonate peroxyhydrate or other materials are suitable alternatives in an aquatic environment.

6. Identify Barriers and Develop Protocols for Organic Nursery Stock Production *(new in 2019)*

The demand for organic nursery stock far exceeds the supply. Research is needed to identify the barriers to expanding this market, then develop and assess organic methods for meeting the growing demand for organically grown nursery stock. That work could include but is not limited to assessing phytosanitary rules for shipping plants and quantifying the production and demand for organic rootstock. Finally, research centered on development of practical organic methods for the nursery industry to implement is needed.

7. Management and Control of Invasive Insects

There is a large pool of research on the control of insects and diseases using organic methods. Many controls use a systems approach and are quite effective. The introduction of new invasive species into cropping systems threatens these systems approaches, and in several cases the organic control options are very limited or nonexistent. For example, spotted wing drosophila is a relatively recent invasive insect that infests soft fruits, such as berries, and many other fruits as well. Infestation renders fruit unusable since insect larvae feed inside the fruit and may reach critical levels before fruit is harvested. This insect is particularly problematic in that it has the ability to oviposit in green fruit, and it has multiple generations throughout the summer, creating an extensive control period. There is only one control material available, and it is in danger of overuse. The control period may also extend so long that maximum label rates are used before the season ends. A second invasive insect is brown marmorated stinkbug, and at this time there are no organic control measures beyond attempts at mass trapping. Research into organic control options for both these invasive pests, and others, is critical so that organic growers can integrate controls into their organic systems. Prevention is critical. Because invasive insect species lack native predators, the organic community needs more information on their biology in order to implement prevention strategies before they become established and are more difficult to control.

8. Nutrition in Organic Crops

How do organic production and shipping methods (including methods of production, handling, and time in transport) influence the nutritional quality, taste, palatability, and ultimately preference for organic vegetables and fruits? There is a lack of sound, rigorously conducted studies of this kind. How can growers and handlers retain nutrition through post-harvest handling and transportation? Additionally, can providing organic producers information on soil biology and soil nutrient composition help improve nutrition? Finally, more studies are needed examining how organic crops compare to conventional crops with regards to nutritional value.

11. Side-by-Side Efficacy Assessments of Organic Inputs

During its five-year review of sunset materials on the National List and in the evaluation of newly petitioned materials, the NOSB often lacks sufficient information of the effectiveness of these materials as compared with other synthetics on the National List, natural materials, and cultural methods. Side-by-side trials with approved organic inputs, both synthetic and natural, and cultural methods to evaluate efficacy would strengthen the review process and provide growers with valuable information in pest and disease management decisions. The NOSB specifically requests collaboration with the Minor Crop Pest Management Program Interregional Research Project #4 (IR4) to include materials on the National List in their product trials. Such studies would help inform the NOSB review process of sunset materials and to determine if materials are sufficiently effective for their intended purpose, particularly when weighed against the natural and cultural alternatives.

Handling

1. Chlorine Materials and Alternatives

The three chlorine materials currently allowed for use in organic agriculture are widely used in farming and handling to clean and disinfect equipment, surfaces, and produce. There have been some concerns raised about these materials and their impact on the environment and human health when/or if they form trihalomethanes and other toxic compounds. New FDA regulations on food safety (Food Safety Modernization Act) and best management practices for cleaning in handling operations both require a suitable level of cleanliness and disinfection to prevent pathogens from entering the food supply. Producers and handlers are looking for alternatives to chlorine while continuing to provide a safe end product to their customers and the consumer. Addressing food safety while adhering to the fundamental organic principles involving human health and environmental impact is a concern.

The organic industry needs better information on how either alternative materials or appropriate chlorine materials are best suited for a specific use and control measure. This is especially important in determining if the industry can move away from the use of chlorine compounds in the future.

Points of consideration for future research activities:

- Comparison of alternatives to chlorine such as: citric acid, hydrogen peroxide, ethanol, isopropanol, peracetic acid, and ozone. How would each compare to the different chlorine materials for specific uses? The strengths and weaknesses would need to be considered.
- Potential human health and environmental impacts of each chlorine material versus the possible alternative materials listed above. Are there ways that these impacts can be mitigated and still allow the material to work as needed?
- Determination of which of the above-mentioned alternatives would NOT be a suitable substitute for chlorine. What specific uses and/or conditions would this apply to?
- Identification of practices that could be used to help reduce the formation of trihalomethanes in those specific situations where chlorine is the best material to use.
- Could the rotation of materials for cleaning and disinfecting help lower the risks from chlorine materials and still be effective in providing the desired control of pathogens?
- Research on the absorption of chlorine by produce from its quantity and use in wash tanks, including information about amount of time of exposure. Would this be a persistent residual effect or temporary (if temporary – how long is it a viable residue), and would it be harmful if consumed at these levels?

2. Celery Powder

Celery Powder is used in a variety of processed meat product (hot dogs, bacon, ham, corned beef, pastrami, pepperoni, salami, etc.) to provide “cured” meat attributes without using prohibited nitrites (note: products must still be labeled “uncured”). Celery powder is naturally high in nitrates that are converted to nitrites during fermentation by a lactic acid culture. It has proven difficult to produce celery powder under organic production practices with sufficient levels of nitrates for cured meat applications. Are there growing practices or regions that could produce celery under organic conditions that would yield a crop with sufficient nitrate content for cured meat applications? Are there agriculturally derived substances (other than celery) that could be produced under organic production practices that provide nitrate levels sufficient for cured meat product applications of comparable quality?

3. Alternatives to Bisphenol A (BPA)

The Handling subcommittee is examining the issue of whether to prohibit BPA in packaging materials used for organic foods in light of direct evidence that these uses result in human exposures and

mounting evidence that these exposures may be harmful. There is a need for increased research about alternatives for the linings of cans and jars used for organic products that do not result in human exposures and health risks.

Materials/GMO

In previous years, the Materials subcommittee has prioritized the Reduction of Genetically Modified Content of Breeding Lines (2013) and Seed Purity from GMOs (2014). These issues are currently being addressed through a Genetic Integrity of Seeds Ad Hoc Working Group.

1. Fate of Genetically Engineered Plant Material in Compost

What happens to transgenic DNA in the composting process? Materials such as cornstalks from GMO corn or manure from cows receiving rBGH are often composted, yet there is little information on whether the genetically engineered material and traits break down in composting process. Do these materials affect the microbial ecology of a compost pile? Is there trait expression of Bt (*bacillus thuringiensis*) after composting that would result in persistence in the environment or plant uptake?

2. Integrity of Breeding Lines and Ways to Mitigate Small Amounts of Unwanted Genetic Material

Are public germplasm collections that house at-risk crops threatened by transgenic content? Breeding lines may have been created through genetic engineering methods such as doubled haploid technology, or they may have had inadvertent presence of GMOs from pollen drift. The extent of this problem needs to be understood.

3. Assess the Genetic Integrity of Organic Crops At Risk (New in 2019)

Develop then implement methods of assessing the genetic integrity of crops at risk in order to quantify the current state of the organic and conventionally produced non-GMO seed. Such assessments are needed on the front (seed purchased by farmers) and back end (seed harvested from a farmer's field) of the production chain as well as on points of contamination in the production chain.

4. Prevention of GMO Crop Contamination: Evaluation of effectiveness

How well are some of the prevention strategies proposed by the NOSB working to keep GMOs out of organic crops? For instance, how many rows of buffer are needed for corn? How fast does contamination percentage go up or down if there are more or fewer buffer rows?

Other examples could be whether cleanout of combines and hauling vehicles reduces contamination using typical protocols for organic cleaning, whether situating at-risk crop fields upwind from GMO crops can reduce contamination, and what the role may be of pollinators in spreading GMO pollen.

Lastly, research is needed on a mechanism to provide conventional growers incentives to take their own prevention measures to prevent pollen drift and its impact on organic and identity-preserved crops. This is policy research rather than field research but is equally as important.

5. Testing for Fraud: Developing and implementing new technologies and practices

New technologies, tests, and methodologies are needed to differentiate organic crop production from conventional production to detect and deter fraud. Testing to differentiate conventional and organic livestock products, for example omega 3 or other indicators, is also needed. Additional tools to identify fraudulent processed and raw organic crops require research to combat this problem. Current methodologies include pesticide residue testing, in field soil chemical analysis, and GMO testing. Areas in need of further testing methodology include phostoxin residues, fumigant residues, carbon isotope rations for traceability, validating nitrogen sources using nitrogen isotope rations, or other experimental

testing instruments that can be utilized to distinguish organic raw and/or processed crops from conventional items. Additionally, there is a need to develop rapid detection technologies for adaptation to field-testing capacities.

General

1. Increasing Access to Organic Foods

What factors influence access to organically produced foods? Individual-based studies are needed to assess the constraints to accessing to organic food. Research should be funded that builds on an understanding of constraints by asking what community, market, and policy-based incentives would enhance access to organic foods.

2. Barriers to Transitioning to Organic Production

What are the specific production barriers and/or yield barriers that farmers face during the three-year transition period to organic? Statistical analysis of what to expect economically during the transition is needed to help transitioning growers prepare and successfully complete the transition process.

Subcommittee Vote:

Motion to adopt the proposal on 2019 NOSB Research Priorities

Motion by: Dave Mortensen

Seconded by: Lisa de Lima

Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0