

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Handling Subcommittee (HS) Notes

Tuesday, April 15, 2025 1:00 pm ET

Present: Allison Johnson (AJ), Chair; Kyla Smith (KS), Vice Chair; Kathryn Deschenes (KD); Carolyn Dimitri (CD); Andrea Hatziyannis (AH); Dilip Nandwani (DN); Amanda Felder (AF)

Absent: Heather Kumar (HK); Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review April 1, 2025 notes
- Prep for spring meeting/public comments
- 2028 sunsets - TR determinations
 - Animal enzymes—(Rennet—animals derived; Catalase—bovine liver; Animal lipase; Pancreatin; Pepsin; and Trypsin) (KD)
 - Calcium sulfate -mined (AF)
 - Glucono delta-lactone (AH)
 - Potassium lactate (AH)
 - Sodium lactate (AH)
 - Tartaric acid - made from grape wine (AJ)
 - Potassium hydroxide (AF)
 - Silicon dioxide (KS)
- Additional items
- Adjourn

Discussion

- **April 1, 2025 notes** were accepted as written.
- **Prep for spring meeting/public comments**
 - The group discussed the upcoming meeting, and the various other meetings preceding the Board meeting. NOSB members were asked to send potential questions to the NOSB Chair by April 18 for transmittal to the NOP. The public comment period ends the same day as the first webinar. The Food Technologist is compiling and summarizing the written comments for the Board members to help with the compressed timeline.
 - At the NOSB meeting, the leads will summarize the substances. Brief summaries are fine.
- **2028 sunsets - TR determinations**
 - **Animal enzymes - (Rennet - animals derived; Catalase - bovine liver; Animal lipase; Pancreatin; Pepsin; and Trypsin) (KD).** The lead looked at previous comments and noted discussion of alternatives, as well as ancillary ingredients. She noted that animal enzymes are widely used, as producers are using vegetarian alternatives. The HS will not request a new TR.
 - **Calcium sulfate - mined (AF).** The TAP is old and focused on tofu production. Calcium is generally accepted as needed. The HS will not request a new TR.
 - **Glucono delta-lactone (AH).** 2015 TR, although not much has changed with regard to use. Originally used in tofu production. The HS discussed fermentation products in general, as the lactate substances are also in that category. A member added that material review organizations have a process in place to analyze these substances, and a TR isn't going to illuminate new information. The HS will not request a new TR.
 - **Potassium lactate (AH).** The HS will not request a new TR.
 - **Sodium lactate (AH).** The HS will not request a new TR.
 - **Tartaric acid - made from grape wine (AJ).** The last TR was done in 2011, and the HS Chair feels it is still solid information and there isn't a need for a new one.
 - **Potassium hydroxide (AF).** Allowed with an annotation. TR is from 2016 and focuses on use and prohibitions. The

- **Silicon dioxide (KS).** The last TR was done in 2010, so it's on the older side. The lead recommended a TR and if capacity does not allow, then a limited scope TR would suffice. The TR questions will be focused on alternatives. In a previous review, silicon dioxide was discussed in relation to other substances, and also flagged for a future annotation change.
- **Additional items.** Cancelled May 6 meeting.
- **The meeting was adjourned.**

[Previous HS Notes](#)

Future call schedule (1st and 3rd Tuesdays 1:00 PM ET | 10:00 AM PT, except where noted).

April 1, 2025

2028 sunsets - TR determinations

Chitosan - petition sufficiency (AH)

April 15, 2025

2028 sunsets - TR determinations

May 6, 2025 - cancelled

May 20, 2025

June 3, 2025

June 17, 2025

July 1, 2025

July 15, 2025

August 5, 2025

August 19, 2025

September 2, 2025

September 16, 2025

October 7, 2025

October 21, 2025

November 4, 2025

November 18, 2025

December 2, 2025

December 16, 2025

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Petitioned Substances

Substance	National List	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Ethylene - Annotation change to expand use	205.605	NL -> LP	Proposal	Petition sent to HS 2.21.24. Petition suff. due 04.21.24. Petition found sufficient 3.19.24. HS requested a limited scope TR. TR due mid Aug 2024. TR sent to HS 8.19.24. Sufficiency due 10.18.24. TR found sufficient 9.17.24	11.19.24 2.4.25	Spr 2025

Substance	National List	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Chitosan	205.605(b)	AH, CD, KS	TBD	Petition sent to HS 3.5.25. 2020 TR Crops 2020 Livestock petition . Petition suff. due 05.04.25. Petition found sufficient 4.1.25. CS requested a TR.	3.18.25 4.1.25	TBD

Other Projects

Project	Contact	Notes*	Scheduled/ status	Target meeting
L-Malic acid reclassification disc doc	AJ/NL	Work agenda request 5.13.19. Sent to NOP 7.3.19. Approved by NOP 8.6.19. 2019 TR	12.17.24 1.7.25 2.4.25	Spr 2025
Research Priorities	DN, KS, All	Spring 2025 list due to MS by January 9, 2025	1.7.25 1.21.25	Spr 2025
Fish oil - CAS number correction proposal	DN	Added to work agenda 12.3.24, based on comments from stakeholder at Fall 2024 NOSB meeting.	1.7.25	Spr 2025

2027 Sunset Review

TR Requests (May 2024), Summary (Spr 2025), Review (Fall 2025)

Substance	National List	Conta ct	TR Request?	Notes*	Scheduled /status	Target meeting
Kaolin	205.605(a)(15)	KD	Y - Lmt'd Scope	Sunset date: 03/15/2027 TAP: 1995 (Kaolin, Bentonite) TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due mid Dec 2024. TR sent to HS 12.18.24. Sufficiency due 2.16.25. TR found sufficient 1.21.25.	1.21.25	Summary: Spr 2025 Review: Fall 2025
Sodium bicarbonate	205.605(a)(26)	DN	Y - Lmt'd Scope	Sunset date: 03/15/2027 TAP: 1995 (Baking powder, aluminum-free) TAP: 1995 (Sodium carbonates) TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due late Dec 2024. TR sent to HS 12.18.24. Sufficiency due 2.16.25. The TR was found sufficient 1.7.25.	1.7.25 2.4.25	" "

Substance	National List	Contact	TR Request?	Notes*	Scheduled /status	Target meeting
Waxes-nonsynthetic (wood resin)	205.605(a)(29)	LP	N	Sunset date: 03/15/2027 TAP: 1996 (Fruit waxes) TR: 2014 (Wood rosin) 2020/Fall - Rec to Renew Tech correction: 11/14/2022 87 FR 68021	12.3.24	" "
Ammonium bicarbonate	205.605(b)(4)	DN	Y - Lmt'd Scope (w/Ammonium bicarbonate, and Ammonium carbonate)	Sunset date: 03/15/2027 TAP: 1995 (Ammonium bicarbonate, Ammonium carbonate) TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due late Sep 2024. TR sent to HS 10.3.24. Suff due 12.2.24. TR found sufficient 11.19.24.	11.19.24 1.7.25 2.4.25	" "
Ammonium carbonate	205.605(b)(5)	DN	Y - Lmt'd Scope (w/Ammonium bicarbonate, and Ammonium carbonate)	Sunset date: 03/15/2027 TAP: 1995 (Ammonium bicarbonate, Ammonium carbonate) TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due late Sep 2024. TR sent to HS 10.3.24. Suff due 12.2.24. TR found sufficient 11.19.24.	11.19.24 1.7.25 2.4.25	" "
Calcium phosphates (monobasic, dibasic, and tribasic)	205.605(b)(9)	AH	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2016 (Phosphates: calcium, potassium, sodium) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.17.24	" "
Low-acyl gellan gum	205.605(b)(18)	KS	N	Sunset date: 12/14/2027 TR: 2018 (Gums) 2020/Fall - Rec to ADD 11/14/2022 87 FR 68021	11.19.24	" "
Ozone	205.605(b)(21)	AF	Y	Sunset date: 03/15/2027 TAP: 1995 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due late Feb 2025. TR sent to HS 12.18.24. Sufficiency due 2.16.25. TR found sufficient 1.21.25	1.21.25	" "

Substance	National List	Contact	TR Request?	Notes*	Scheduled /status	Target meeting
Sodium hydroxide	205.605(b)(32)	AF	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2020 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.17.24	" "
Carnauba wax	205.606(a)	LP	N	Sunset date: 03/15/2027 TAP: 1996 (Fruit waxes) TR: 2014 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24	" "
Beet juice extract color	205.606(d)(1)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Beta-carotene extract color	205.606(d)(2)	AJ	N	Sunset date: 03/15/2027 TR: 2011 (β-Carotene) TR: 2015 (Colors) 2020/Fall - Rec to Renew 04/14/2023 88 FR 22893	9.17.24	" "
Black/purple carrot juice color	205.606(d)(3)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Chokeberry, aronia juice color	205.606(d)(4)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Elderberry juice color	205.606(d)(5)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Grape skin extract color	205.606(d)(6)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Purple sweet potato juice color	205.606(d)(7)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Red cabbage extract color	205.606(d)(8)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "

Substance	National List	Contact	TR Request?	Notes*	Scheduled /status	Target meeting
Red radish extract color	205.606(d)(9)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Saffron extract color	205.606(d)(10)	AJ	N	Sunset date: 03/15/2027 TR: 2015 (Colors) 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	9.17.24	" "
Cornstarch (native)	205.606(e)	CD	Y	Sunset date: 03/15/2027 TAP: 1995 TR: NA 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699 TR due early Nov 2024. TR sent to HS 12.6.24. TR suff due 2.4.25. TR found insufficient 12.17.24. HS sent additional questions to TR writer. Response sent to HS. TR found sufficient 2.18.25	12.3.24 12.17.24 2.18.25	" "
Glycerin	205.606(i)	CD	N	Sunset date: 03/15/2027 TAP: 1995 TR: 2013 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24	" "
Inulin-oligofructose enriched	205.606(k)	CD	N	Sunset date: 03/15/2027 TR: 2015 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	12.3.24	" "
Orange shellac	205.606(n)	KS	N	Sunset date: 03/15/2027 TAP: 1999 (Waxes) TAP: 2002 TR: 2014 2020/Fall - Rec to Renew 08/03/2021 86 FR 41699	11.19.24	" "

Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	March 28, 2025	16 -20
NOP - Draft Spring 2025 NOSB meeting tentative agenda	Feb 7, 2025	~ 10
NOSB - Spring 2025 proposals due to NOP	Feb 13, 2025	~ 9
NOP - Post proposals	March 28, 2025	7.5

Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
Public comment closes	April 28, 2025	1
NOP - Send compiled public comments to NOSB	April 29, 2025	1
Public comment webinars	Apr 22 & 24, 2025	1
Spring 2025 NOSB meeting - Virtual	Apr 29 - May 1, 2025	0
Final recommendations due	May 29, 2025	30 days post meeting

Fall 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 15, 2025	24
NOP - Draft Fall 2025 NOSB meeting agenda	Aug 8, 2025	~11
NOSB - Fall 2025 proposals due to NOP	Aug 20, 2025	~9
NOP - Post proposals	Sept 9, 2025	~8
Public comment closes	Oct 8, 2025	~4
NOP - Send compiled public comments to NOSB	Oct 14, 2025	~3
Public comment webinars	Oct 28 & 30, 2025	1
Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~30 days post

2028 Sunset Review

TR Requests (June 2025), Summary (Spr 2026), Review (Fall 2026)

Previous Sunset Recommendations: [2021/Fall - Rec to Renew](#)

Previous Rule/Renewals: [04/14/2023, 88 FR 22893](#)

Substance	National List	Contact	TR Request?	Notes*	Scheduled/status	Target meeting
Agar-agar	205.605(a)(2)	DN	Y - Lmt'd Scope	Sunset date: 05/29/2028 2011 TR 1995 TAP	3.18.25 4.1.25	Summary: Spr 2026 Review: Fall 2026
Animal enzymes— (Rennet—animals derived; Catalase— bovine liver; Animal lipase; Pancreatin; Pepsin; and Trypsin).	205.605(a)(3)	KD	N	Sunset date: 5/29/2028 2024 Lmt'd Scope TR (enzymes, microorganisms, yeast) 2015 TR (enzymes) 2011 TR (enzymes) 2000 TAP	3.18.25 4.15.25	“ “

Substance	National List	Contact	TR Request?	Notes*	Scheduled/status	Target meeting
Calcium sulfate - mined	205.605(a)(8)	AF	N	Sunset date: 5/29/2028 2001 TAP 1996 TAP	3.18.25 4.15.25	" "
Carrageenan	205.605(a)(9)	CD	Y - Lmt'd Scope	Sunset date: 5/29/2028 2016 Lmt'd Scope TR 2011 TR 1995 TAP	3.18.25 4.1.25	" "
Glucono delta-lactone	205.605(a)(14)	AH	N	Sunset date: 5/29/2028 2016 TR 2002 TAP	3.18.25 4.15.25	" "
Tartaric acid - made from grape wine	205.605(a)(28)	AJ	N	Sunset date: 5/29/2028 2011 TR	3.18.25 4.15.25	" "
Cellulose	205.605(b)(11)	CD	N	Sunset date: 5/29/2028 2016 TR 2001 TAP	3.18.25 4.1.25	" "
Chlorine Materials: Calcium hypochlorite	205.605(b)(12)(i)	LP	Y Lmt'd Scope	Sunset date: 5/29/2028 2006 TR (Chlorine/Bleach)	3.18.25 4.1.25	" "
Chlorine Materials: Chlorine dioxide	205.605(b)(12)(ii)	LP	Y Lmt'd Scope	Sunset date: 5/29/2028 2006 TR (Chlorine/Bleach)	3.18.25 4.1.25	" "
Chlorine Materials: Hypochlorous acid - generated from electrolyzed water	205.605(b)(12)(iii)	LP	Y Lmt'd Scope	Sunset date: 5/29/2028 2015 TR 2006 TR (Chlorine/Bleach)	3.18.25 4.1.25	" "
Chlorine Materials: Sodium hypochlorite	205.605(b)(12)(iv)	LP	Y Lmt'd Scope	Sunset date: 5/29/2028 2006 TR (Chlorine/Bleach)	3.18.25 4.1.25	" "
Potassium hydroxide	205.605(b)(26)	AF	N	Sunset date: 5/29/2028 2016 TR 2001 TAP	3.18.25 4.15.25	" "
Potassium lactate	205.605(b)(27)	AH	N	Sunset date: 5/29/2028 2015 TR (lactic acid, sodium lactate, potassium lactate)	3.18.25 4.15.25	" "
Silicon dioxide	205.605(b)(29)	KS	Y	Sunset date: 5/29/2028 2010 TR 1996 TAP 1995 TAP (colloidal silica)	3.18.25 4.15.25	" "
Sodium lactate	205.605(b)(33)	AH	N	Sunset date: 5/29/2028 2015 TR (lactic acid, sodium lactate, potassium lactate)	3.18.25 4.15.25	