

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

Date: May 1, 2025

Subject: Iodine Annotation Change

NOSB Chair: Amy Bruch

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: X

Guidance Statement:

Other:

Statement of the Recommendation:

The NOSB recommends an amendment to the current listing for iodine at § 205.603(a)(16) and § 205.603(b)(4) to prohibit iodine formulations that include nonylphenol ethoxylates.

Rationale Supporting Recommendation:

The Organic Foods Production Act (OFPA) National List Criteria include the requirement that all National List substances “not be harmful to human health or the environment.” We now understand that a common surfactant used in iodine products (nonylphenol ethoxylates) is extremely toxic to aquatic ecosystems. Because iodine used in livestock operations can easily travel to aquatic ecosystems through manure applications, the inclusion of these substances in iodine products is not consistent with OFPA criteria and should not be permitted in organic production.

NOSB Vote:

Motion to amend the listing for iodine at § 205.603(a)(16) and § 205.603(b)(4) as follows: Iodine, must be produced without the use of nonylphenol ethoxylates.

Motion by: Nate Lewis

Seconded by: Brian Caldwell

Yes: 13 No: 0 Abstain: 0 Recuse: 0 Absent: 2

Motion Passed

**National Organic Standards Board
Livestock Subcommittee
Iodine Annotation Change Proposal**

Summary of Review:

The National Organic Standards Board (NOSB) acknowledges that iodine remains necessary to livestock operations as a sanitizer for medical procedures and for topical use, particularly as a teat dip for dairy animals. NOSB has heard from numerous stakeholders that it is time to ensure that iodine products used on organic farms are free from nonylphenol ethoxylates (NPEs) since they play a role in endocrine disruption. A limited scope TR was requested to evaluate the availability of NPE-free iodine products and their suitability, the potential for NPEs contained in iodine products to contaminate organic products and the environment, and what detrimental effects may occur should NPEs enter the supply chain or be applied to soil.

At NOSB's Spring 2024 meeting, the Livestock Subcommittee (LS) requested comments from stakeholders related to a potential annotation on iodine to prohibit NPEs. Commenters generally expressed support for the phase out of iodine formulas that contain NPEs. Environmental groups applauded the idea that organic farmers would lead the way in the removal of these harmful substances from their organic system plans. Certifiers and material review organizations (MROs) indicated that there are numerous formulations available on the market approved for use in organic system plans that do not contain NPEs. Dairy producers indicated support for the additional restriction, as it would better support organic principles of minimizing the impact to the environment, while not overly burdening organic dairy farmers with too few options for iodine products. Commenters suggested that the annotation prohibit all alkylphenol ethoxylates, and not just NPEs.

At its Fall 2024 meeting the NOSB proposed annotating iodine to prohibit all alkylphenol ethoxylates. However, public comments indicated that industry has not developed the necessary skillset and best practices to identify and prohibit iodine products containing alkylphenol ethoxylates that are not NPEs. Public comments also indicated that the vast majority of iodine products containing alkylphenol ethoxylates use NPEs, not alternative substances. Additionally, while there are some patents that include octylphenol ethoxylates as alternative formulants, it is extremely uncommon for manufacturers to use these substances. Based on feedback from stakeholders at the Fall 2024 meeting, the LS has revised its proposed annotation change to restrict only NPEs from iodine products.

Subcommittee Vote

Motion to amend the listing for iodine at § 205.603(a)(16) and § 205.603(b)(4) as follows:

Iodine, must be produced without the use of nonylphenol ethoxylates

Motion by: Nate Lewis

Seconded by: Brian Caldwell

Yes: 5 No: 0 Abstain: 0 Recuse: 0 Absent: 1