

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

Date: November 15, 2022

Subject: NOSB Research Priorities 2022

NOSB Chair: Nate Powell-Palm

The NOSB hereby recommends to the NOP the following:

Other: X

Statement of the Recommendation:

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.

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.

The NOSB anticipates that these Research Priorities will be shared with the USDA's National Institute of Food and Agriculture (NIFA) and the Agricultural Research Service (ARS), as well as other research entities.

Rationale Supporting Recommendation:

All research priorities outlined in this proposal and executive summary have been compiled to ensure consistency with OFPA and Organic Regulations in general.

NOSB Vote:

Motion to accept the proposal on the 2022 NOSB Research Priorities

Motion by: Wood Turner

Seconded by: Brian Caldwell

Yes: 15 No: 0 Abstain: 0 Recuse: 0 Absent: 0

Motion Passed

See below for full recommendation.

USDA National Organic Standards Board
Research Priorities Proposal
Fall 2022
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.

Livestock

1. Determine the efficiency of natural parasiticides and methodologies, including but not limited to, nutritional programs, use of herbs, essential oils, homeopathic remedies, Diatomaceous Earth, and the genetic pool of laying hens in controlling *A. galli* and *H. gallinarum* in laying and replacement chickens intended to become hens.
2. Evaluate natural alternatives to DL-Methionine in a system approach for organic poultry feed program.
3. Evaluate ways to prevent and manage parasites in livestock, examining breeds, geographical differences, alternative treatments, and pasture species.
4. Develop a dairy program to address climate change mitigation strategies where milking capabilities are not hindered, and effective forage rotations are maximized.
5. Develop balanced organic livestock rations that incorporate high percentages of diverse, regionally adapted grain crops to reduce the reliance on corn and soybeans and allow farmers to realize more marketing opportunities for a robust crop rotation.

Crops

1. Examination of decomposition rates, the effects of residues on soil biology, and the factors that affect the breakdown of biodegradable bio-based 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 (including specific considerations related to copper use in organic rice production) 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 problem insects and weeds.
8. Factors impacting organic crop nutrition, and organic/conventional nutrition comparisons.
9. Side-by-side trials of approved organic inputs, both synthetic and natural, and cultural methods, with a request for collaboration with the IR4 project.
10. Impartial evaluation of microbial inoculants, soil conditioners, and other amendments is needed as there is little objective evidence upon which to assess their contribution to soil health.
11. More research, extension, and education are needed to fully understand the relationship between on-farm biodiversity and pathogen presence and abundance.
12. Elucidate practices that reduce greenhouse gas emissions and that contribute to farming systems resilience in the face of climate change.

Food Handling and Processing

1. Sanitizers: Effective alternatives of sanitizers, effect on occupational human health and environment, effectiveness of rotational use strategies with the sanitizers currently on the National List
2. Effect of various types of food packaging on organic products, including suitable alternatives to BPA (Bisphenol-A) for linings of cans used for various products, plastic use, antimicrobial nanoparticle surface coatings of packaging.
3. Research on the creation of an overarching ancillary ingredient review process for materials used in processing and handling vs reviewing ancillaries as part of the petition or sunset review process, including cost/benefit of each process.
4. Alternatives to conventional celery powder for curing organic meat.
5. Research on best practices for identifying potential vectors of heavy metal contamination in organic systems, including strategies for effective testing in soils, water, organic processing, etc. that could lead to the identification and prevention of heavy metals transgression in organic systems.
6. Evaluation of the essentiality of 205.605(a), 205.605(b), and 205.606 substances and the suitability of organic alternatives in applicable food formulations via laboratory testing, sensory evaluation, and/or market analysis.

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 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.

**National Organic Standards Board
Materials Subcommittee Proposal
2022 Research Priorities
Fall 2022**

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 proposed an updated set of priorities at the Fall 2021 board meeting. The Board requests input from stakeholders on the 2022 research priorities and will review those comments for the Fall 2022 proposal.

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 reflect the existing need more accurately for new knowledge.

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.

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

Livestock

1. Efficiency of Natural Parasiticides and Methodologies – Nutritional programs, use of herbs, essential oils, homeopathic remedies, Diatomaceous Earth, and the genetic pool of laying hens in controlling *A. galli* and *H. gallinarum* in laying and replacement chickens intended to become hens – among other interventions – may be helpful in ensuring flock health. Ongoing research into the usefulness and viability of such innovations is consistent with NOSB action.

2. 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; (3) assessment of management practices for improving existing organic poultry welfare under different conditions; and (4) with the European Union as a case study, assess how it is that EU farmers manage the methionine needs of their flocks in the absence of synthetic methionine use. 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.

3. 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, bird and 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, diatomaceous earth, or other treatments that have been proven to work overtime? What are the parasite-resistant breeds? Are there plant species in pastures, hayfields, 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?

4. Develop a dairy program to address climate change mitigation strategies where milking capabilities are not hindered, and effective forage rotations are maximized. - To further acknowledge the central role the certified organic industry will play in the fight against climate change, an opportunity exists to both empower the economic resilience of organic dairy farmers while harnessing the soil building potential of diverse perennial and annual forages, we encourage the research community to dedicate resources to the following need:

A. Identify an index of dairy cattle genetics to which producers could breed their existing herds and achieve a minimum of 12,000 lbs. of milk production per year on 100% forage diets. In considering the genetics selected, also identify animals bred for longevity as the more lactations on a cow, the more spread out the fixed costs of raising her as a heifer becomes.

B. To assist dairy farmers in having the tools to consider a forage-based rotation for their herds, research and identify crop rotations that have three functions: produce high quality forage, maximize soil building, and result in the most profitable outcome for the dairy producer.

5. Develop balanced organic livestock rations that incorporate high percentages of diverse, regionally adapted grain crops to reduce the reliance on corn and soybeans and allow farmers to realize more marketing opportunities for a robust crop rotation. - The US organic livestock demand and consumption of organic corn and soybean meal in feed rations exceeds US production. To help encourage farmers to utilize robust crop rotation programs that are specific to their geographical region, give livestock producers more product availability/flexibility of ingredients, and reduce the dependence on corn and beans, there needs to be proven equitable rations in all livestock segments that include alternative energy and protein sources

Crops

1. Biodegradable Bio-based Mulch Film - Biodegradable mulch was recently approved by the NOSB but did not specify a required percentage of biologically derived (i.e., bio-based) content. In 2015, NOP issued a Policy Memo that states that certifiers and material organizations should review biodegradable mulch film products to verify that all (100%) of the polymer feedstocks are bio-based. This requirement makes bio-based mulches unavailable to organic producers because petroleum-based polymers are present 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 are important to develop more clarity on mulch films and possibly develop an additional annotation to address producer needs for biodegradable mulch films even if petroleum-based polymers are used:

- 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 or breakdown products of these mulches that do not fully decompose? Do any of these mulches 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? What are the environmental fates of micro- and nano-plastic fragments resulting from biodegradable mulch film degradation, and what hazards do they present to organisms that they interact with on the way to that fate?
- 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 - How do organic systems impact ecosystem service provisioning, both on-farm and off-farm through the materials and inputs sourced and used for production? For example, life-cycle analysis of environmental costs and benefits of inputs used for organic production, such as manure, seaweed, and fish-based soil amendments, would be beneficial. Additionally, what is the impact of diversified and agroecologically designed organic farming systems on biodiversity and ecosystem services within the farm and in its surroundings? 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 and Minimum Tillage - Organic no-till 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.

Farmers are employing several different approaches to organic no-till. Some are using a roller-crimper to terminate cover crops for in-place mulching. They then transplant or seed directly into the cover crop

mulch. Others are utilizing polyethylene sheets (silage tarps) to prepare land for no-till planting. This approach often involves termination of a cover crop, as with the roller-crimper systems, but seemingly as often, or more frequently, is utilized to prepare fallow ground (for stale seed bedding, termination of crop residue and subsequent incorporation via soil fauna), or in conjunction with large applications of compost or other sources of organic matter.

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 potential pest 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 mulching system on weed, pest, and disease management, as well as soil fertility?
- What are the biodiversity benefits to living and/or killed mulches, and how does this contribute to pest, weed, and disease management?
- Do these systems 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?
- Research is needed on seeds, specifically for good cold germination, rapid emergence and establishment, seedling vigor, nutrient uptake efficiency, and overall weed competitiveness to crop cultivar development goals for organic conservation tillage systems.
- How can reduced tillage weed management be improved, including development of new tools and techniques that provide greater weed control for less soil disturbance?

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 - 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 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 primarily on cover crops to meet production needs, particularly for horticultural crops. At present, there is inadequate data on the nutrient benefits of different cover crop mixes and how those benefits vary according to species mix, mowing practices, tillage regimes, subsequent planting time of the cash crops, and importantly the preceding practices that define the legacy of individual fields.

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.
- Research on scum and algae control in rice and whether sodium carbonate peroxyhydrate or other materials are suitable alternatives in an aquatic environment.
- Soil management and crop cultivar development for enhanced beneficial crop-root microbe partnerships that protect organic crops from soil borne and foliar pathogens.
- Alternatives to antibiotics (tetracycline and streptomycin) for fire blight control, particularly in pears and apples.

Specifically related to organic rice production and the ongoing concern about copper usage related to that crop (although not exclusive to it), more research is needed on disease management that:

- 1) supports a systems-based approach to reduce the needs of copper materials;
- 2) addresses a breeding component for disease resistance (where copper is used);
- 3) addresses alternate formulations to help reduce elemental copper;
- 4) speaks to developing biological agents to (hopefully) displace copper with a softer alternative;
- 5) evaluate plant nutritional strategies to lessen disease impacts.

6. Identify Barriers and Develop Protocols for Organic Nursery Stock Production

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. Research has shown that application of the correct ectomycorrhizal inoculants to roots can substantially (50% or more) enhance establishment and early growth of woody perennial horticultural crops. How can fine tuning the use of mycorrhizal inoculants make organic nursery stock production easier and more profitable, thereby helping to close the demand/supply gap? Research centered on development of practical organic methods for the nursery industry to implement is needed, including:

- Disease and insect control materials that are allowed under organic standards and may be accepted under specific phytosanitary regulatory requirements.

- New materials for controlling pests addressed by phytosanitary rules that show promise of compatibility with National List review criteria.
- Alternative protocols for phytosanitary certification of nursery stock that are based on outcomes (such as testing or inspection) rather than requirements for use of synthetic materials during production.

7. Management of Problem Insects and Weeds - There is a large pool of research on the control of insects and weeds using organic methods. Many controls use a systems approach and are quite effective. However, some arthropod pests including new invasive species, are problematic, and in several cases the organic control options are very limited or nonexistent. The organic community needs more information on their biology, life cycle weak points, and natural enemies to implement targeted and systemic management.

Examples are:

- spotted wing drosophila
- brown marmorated stinkbug
- Spotted lanternfly
- Swede midge
- Leek moth
- Corn rootworm beetle (northern and western)
- Cutworms (army, western bean, etc.)
- and others

Weed management is one of the greatest challenges to successful organic crop production. Development of integrated organic management strategies that effectively control weeds in specific cropping systems without excessive tillage continues to be a top research priority for organic producers. For instance, Canadian thistle, pigweed (including invasive palmer amaranth and waterhemp), wild sunflower, giant ragweed, cocklebur, and other perennial weeds can be very difficult to control in reduced tillage systems.

Research into new technologies such as electroshock weeders, interrow mowers, camera-guided cultivators, laser-weeders incorporating AI (artificial intelligence) and robotics, propane flamers, etc. is critical to success in field crops, whereas tarping, solarization, and a new generation of hand tools have great potential in small- to medium-scale vegetable crops. For large scale vegetable as well as row-crop producers, strip tillage and compatible weed management tools including row cleaners, finger weeders, and high residue cultivators can combine reduced tillage and cover crops into one practice set.

Future cropping systems will utilize multiple elements of soil, crop, pest, and weed management. The integration of tools such as weed-suppressive cover crops and rotations, livestock grazing, flaming, beneficial insect habitat, intercropping, etc. into annual and perennial cropping systems needs more research.

8. Nutritional Value of Organic Crops - How do organic soil health and fertility practices - crop rotations, cover crops, compost and other organic or natural mineral amendments, etc. - affect the nutritional value or “nutrient density” of organically produced 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.

9. Side-by-Side Efficacy Comparisons Between National List Allowed and Petitioned Synthetic Inputs Versus Non-synthetic Alternative Inputs or Practices - 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. It should be noted that growers commonly rely on a mix of cultural practices and both non-synthetic materials and materials from the National List to produce crops of marketable quality and sufficient yield for profitability; it is understood that such studies would serve as a starting point and would form part of the comprehensive material review process.

10. Evaluation of Microbial Inoculants, Soil Conditioners, and Other Amendments – Vendors of organic amendments now offer a large and growing array of microbial inoculants, organic soil conditioners, and other materials claimed to improve soil health, crop vigor and quality, and combat weeds, pests, and diseases. There is an urgent need for impartial evaluation of these materials to help producers decide which products to use and to avoid unnecessary expenditures on products that are unlikely to yield benefits.

11. Pathogen Prevention - Third-party food safety auditors believe that some biodiversity-maintenance strategies employed by organic farmers may increase the risk for introduction of human pathogens on the field. While some research has been conducted disproving this hypothesis, more research, extension, and education are needed to fully understand the relationship between on-farm biodiversity and food safety – and this research must be communicated to third-party food safety auditors and incorporated into their audits.

12. Climate Change (Reducing Greenhouse Emissions and Sequestering Carbon) - A growing body of research demonstrates that organic farming can help prevent anthropomorphic climate change, and some strategies employed by organic farming can also help with resilience to current climate challenges such as drought and flooding. Although a number of researchers are examining this issue, additional work is needed to pinpoint specific strategies that organic farmers can take to reduce greenhouse gas emissions and respond to current climate challenges threatening the future of our food security.

Handling

1. Chlorine Materials and Alternatives - 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. Chlorine materials are also acutely toxic to workers. New sanitizers and disinfectants are regularly petitioned to the NOSB for addition to the National List. 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 use in wash tanks, including information about the amount of time of exposure, would help inform understanding of human exposure to chlorine and health risks. Are residues from produce washing 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?
- Can research projects that emphasize and reinforce collaboration between researchers, agencies that regulate sanitizers and food safety, and NOP be designed with the goal of developing an alternative process for evaluating sanitizers and sanitation practices for use by organic operations?
- Is there a measurable transfer of sanitizer residue to organic food following the sanitization of food contact surfaces? If residues are not found, is it even necessary for the National List to regulate surface/environmental sanitizers? (This topic should not be limited to only National List materials, but should also include sanitizers such as quaternary ammonia compounds.)
- What amount of sanitizer/disinfectant remains on the surface of various organic products after a processing or packing step that includes direct treatment with a sanitizer? Does that include a water bath containing water treated with a sanitizer?
- Could the development of robust, post-harvest handling standards better identify which sanitation, disinfectant, or treatment practices have an impact on organic integrity? Could expanded handling standards assist in regulating and enforcing the use of sanitizers instead of, or in addition to, the National List?
- Could restructuring the National List to separate sanitizers from ingredients and processing aids create a pathway to development of an alternative set of evaluation criteria for sanitizers?
- What would the impact on handlers and processors be if any one of the sanitizers were removed from the National List?

2. 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), issues which are currently being addressed through a comprehensive stream of work on Excluded Methods. The following research priorities are among the areas that the Excluded Methods work continues to elevate:

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 - Develop then implement methods of assessing the genetic integrity of crops at risk 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 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 accept the proposal on the 2022 NOSB Research Priorities

Motion by: Wood Turner

Seconded by: Brian Caldwell

Yes: 5 No: 0 Abstain: 0 Recuse: 0 Absent: 2

Approved by Wood Turner, Materials Subcommittee Chair, to transmit to NOSB, August 9, 2022