

**Formal Recommendation by the
National Organic Standards Board (NOSB)
to the National Organic Program (NOP)**

Date: May 23, 2012

Subject: Materials Committee—(Research Priorities)

Chair: Barry Flamm

The NOSB hereby recommends to the NOP the following:

Rulemaking Action	_____
Guidance Statement	_____
Other	_____X_____

Statement of the Recommendation (Including Recount of Vote):

See attached Research Priority Criteria and Process Framework.

Vote: 15 yes, 0 no, 0 abstain, 1 Absent 0 recuse

**Rationale Supporting Recommendation (including consistency with
OFPA and NOP):**

OFPA and the Federal Rule use review criteria that involve assessing alternatives to the use of materials. This framework enables the NOSB to encourage the research community to do research on topics that the NOSB would like more information.

Committee Vote:

Moved: Zea Sonnabend **Second:** Calvin Walker

Yes: 14 **No:** 0 **Abstain:** 0 **Absent:** 1 **Recusal:** 0

**National Organic Standards Board
Materials Committee
Proposal for
Research Priorities Framework**

March 27, 2012

Introduction

A discussion document on a Research Priorities Framework was circulated at the last National Organic Standards Board (NOSB) meeting in November 2011. Relatively little public comment was received but much of the public comment on the other issues on the agenda brought up the ongoing need for research on many topics that come before the NOSB. We are therefore proceeding to adopt criteria and a process for making the research priorities of the NOSB known to researchers, funders, and the public.

Background

Please refer to the previous (September 27, 2011) Proposed Discussion Document for most of the background about why there is a need for this recommendation.

The discussion document was generally viewed favorably by the commenters with the primary constructive points being fleshing out how the information is prioritized and disseminated and the suggested addition of one criterion about need for alternatives to materials on the National List.

Relevant areas in the Rule

The very definition of Organic Production implies a positive approach to farming and handling that would benefit from research into the integration of cultural, biological and mechanical practices:

"§ 205.2 Terms defined.

Organic production. A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity."

The National List section requires the NOSB to evaluate a variety of criteria. In doing so, the NOSB often finds gaps in the research that would be relevant to making an informed decision on whether to add a substance to the National List.

"§ 205.600 Evaluation criteria for allowed and prohibited substances, methods, and ingredients

The following criteria will be utilized in the evaluation of substances or ingredients for the organic production and handling sections of the National List:

....."

Discussion

Much discussion of this topic occurred in the Discussion document from fall 2011. The goals of this recommendation are worth repeating here, with a little streamlining.

The primary goal of this framework is for the NOSB to align on criteria for prioritizing research needs and recommend a process for collecting and communicating research needs. Additional benefits include:

- Influencing where research dollars are directed and increasing the amount of research being done related to organic agriculture.
- Allowing the NOSB to be more proactive with regards to problematic or controversial National List substances by creating a mechanism to advocate for primary research ahead of material review dates
- Reducing disagreement within the organic community by increasing the amount of primary research on which decisions could be based, while satisfying many different stakeholders that the criteria have been met.
- Making the research community aware of the research needs of organic producers and handlers. Awareness could allow for USDA funding of primary research in these top priority areas and provide support for researchers submitting grants requests these research areas.

It has been recognized through the process of reviewing materials by the NOSB that it is important not only to identify the research topic, but to ask the specific questions on a topic around which research is needed.

As a recent example, oxytetracycline, indicates, the topic may be "Alternatives to Antibiotics in Organic Fruit Production", but then the supplemental research questions could include (*these are only examples*):

- Are there common elements, such as cultural or biological methods, that should be incorporated into any Organic System Plan for prevention of fireblight?
- What are the region-specific limitations of resistance to fireblight for both rootstocks and varieties?
- What strategies and characteristics can make a fireblight resistant apple or pear variety acceptable to consumers?
- Are any of the alternative materials and methods named in the TR effective in all areas of the country?
- Are there other alternative materials that have not yet been investigated?

Each one of these questions may take a considerable time to research, but each of them are important and may fit into different areas of expertise from different researchers. Therefore, the committee feels that at least some questions should be associated with each of the top group of research priorities chosen. By doing this, aspiring organic researchers from among plant breeders, laboratory scientists, livestock nutritionists, pesticide toxicologists and more can have some guidance on what is needed and justification to put into research proposals.

Recommendation

This recommendation consists of criteria for identifying research needs, a process for the NOSB to use in developing a yearly recommendation on research needs, including making the public aware of the research recommendations.

Criteria

The criteria for prioritization are for those topics that the NOSB believes will have the largest long-term impact on growth and integrity of organic agriculture. These criteria are not presented in order of importance, but will be evaluated by the Materials Committee in selecting the top research needs.

Criteria for research topics are:

- Persistent and chronic (i.e., perennial topics of debate and need)
- Challenging
- Controversial (i.e., topics on which there are widely differing perspectives or for which there have been close NOSB votes)
- Nebulous (i.e., the research need is hard to identify but the organic agriculture need is clear). For example, improved methods of weed control.
- Lacking in primary research. That is, topics for which there is no active research being conducted, primarily relating to the criteria in OFPA for review of materials..
- Relevant to assessing the need for alternative cultural, biological, and mechanical methods to materials on the National List.

Process Framework

1. The Materials Committee will collect research topics from public comment, NOP and NOSB committees on an on-going basis. Specifically, the Materials committee should review research topic needs after every NOSB meeting to ensure that public comment and NOSB discussion on new research needs are added to a 'running' list.
2. Each NOSB Committee will address the question of research priorities that have been uncovered in the course of Committee business. Committees shall identify the specific research need(s), background on the problem(s), and a description of how the research will contribute to the ability of the NOSB to carry out its function of reviewing materials in an organic systems framework. They shall submit their committee list to the Materials Committee after each NOSB meeting.
3. Research topics will be kept by the Materials committee on an all-inclusive 'running' list. The list would include a description of the research questions that need to be addressed, and how the research methods need to be applied in an organic context. It can include a preliminary list of what entities are involved in that type of research and an evaluation of funding opportunities, collaborations and endorsements.
4. On an annual basis, the committee will review the list and based on the criteria adopted above sort the list into two groups: the top research priorities for NOSB review as a recommendation, and the rest of the research suggestions to remain on an on-going list. The top priorities will not be ranked, but will have descriptions of the key questions that the NOSB wishes to see researched about each topic.
5. The Materials Committee will present the recommendation of the top research priorities to the full NOSB each year at the fall meeting. At this time public comment can be sought about the priorities and the research questions, as well as unbiased entities or individuals who may be able to conduct pressing organic research activities. The list of remaining items that the Materials Committee has chosen not to bring forward to the full Board will also be made available to the public, so that individuals with desire to research specific subjects can know what some of the broader topics are.
6. After a recommendation is finalized by the NOSB each fall the Chair of the Board will make sure it is sent to the primary organic research funders such as NIFA, ARS, NRCS,

OFRF, and private foundations and other funders that may be identified. In addition all NOP staff, NOSB members and stakeholders can use the list for inspiring appropriate research.

Committee Vote

Motion to adopt the proposed recommendation on Research Priority Criteria and Process.

Motion by: Zea Sonnabend Second: Calvin Walker
Yes: 5 No: 0 Absent: 1 Abstain: 0 Recuse: 0