

**FORMAL RECOMMENDATION BY THE  
NATIONAL ORGANIC STANDARDS BOARD (NOSB)  
TO THE NATIONAL ORGANIC PROGRAM (NOP)**

**Date:** 6-3-06

**Subject: Sunset Review - 205.601 Synthetic substances allowed for use in organic crop production**

**Chair: Kevin O'Rell**

**Recommendation**

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: XXXXXX

Guidance Statement: \_\_\_\_\_

Other: \_\_\_\_\_

**Statement of the Recommendation (including Recount of Vote):**

See attached Recommendation for Renewal of Horticultural Oils as Synthetic substances allowed for use in organic crop production on 205.601, category use (e) as insecticides and (i) as plant disease control.

**NOSB Vote:**

**Moved: Gerald Davis                      Second: Nancy Ostiguy**

**Yes – 9**

**No – 3**

**Abstain – 0**

**Absent – 2**

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

**NOSB Sunset Material Vote**

**Response by the NOP:**

**NOSB- Crops Committee  
Horticultural Oils- Sunset Recommendation  
Final NOSB Recommendation 4/20/2006**

**I. List: 205.601 Synthetic substances allowed for use in organic crop production**

**II. Category Use**

(e): As insecticides

(i): As plant disease control

**III. Committee Summary:** Pertaining to oils (horticultural), comments were received saying that natural alternatives were available as replacements. Vegetable oils were mentioned as the natural product replacement, but were questioned to see if these are appropriate and effective. According to a representative of one California organic certifier, all the vegetable oil formulations for crop protection use have synthetic emulsifiers in them. Without the emulsifier, the oils would not work as a spray material for crops. It could be argued that these products would not be wholly natural substitutes. Further comments were received stating that multi-year grower comparative tests between vegetable oil products and the petroleum derived oils showed that the vegetable oils did not control certain target pests adequately. Research data that could verify the claim that the vegetable oil alternatives are truly adequate as a replacement is needed.

**IV. Committee Recommendation:**

Recommendations based upon comments received- 205.601(e) and (i)

The Crops Committee recommends the renewal of the following material in these categories of use:

**(e) As insecticides (including acaricides or mite control).**

**(6) Oils, horticultural- narrow range oils as dormant, suffocating, and summer oils.**

**(i) As plant disease control.**

**(6) Oils, horticultural- narrow range oils as dormant, suffocating, summer oils.**

Moved: Rigoberto Delgado                      Second: Jeff Moyer

Committee vote: 3-1                      Absent: Ostiguy

**NOSB Vote:**

Moved: Gerald Davis                      Second: Nancy Ostiguy

Yes – 9

No – 3

Abstain – 0

Absent – 2