

USDA NOP Guidelines on Cottonseed for Organic Production

1. NOP Guidance on Non-Organic Cottonseed and Delinting

When organic cottonseed is not commercially available, non-organic cottonseed may be used in organic production, provided it complies with NOP requirements under 7 CFR §205.204.

Key Provisions (NOP 5029-1: Seeds, Annual Seedlings, and Planting Stock):

- Seed Treatment Residues:

Substances used in production, post-harvest handling, or cleaning of non-organic seed do not require review if they do not remain on the seed when planted.

NOP 5029-1, Paragraph 5: "Substances used during the production of non-organic seed or non-organic planting stock do not require review... that do not remain on the seed when it is planted."

- Sulfuric Acid Delinting:

Non-organic cottonseed delinted with sulfuric acid is allowed if the acid has been neutralized and no residue remains.

Certification agencies may require a manufacturer affidavit confirming neutralization and absence of residue.

- Affidavit Documentation:

Affidavits should verify: (1) Type of treatment used, (2) Neutralization steps taken, and (3) No residual prohibited substances remain.

2. Rules for Organic Cottonseed and Delinting

When organic cottonseed is available, it must be used. Organic cottonseed delinting and preparation must comply with NOP regulations and the National List of Allowed and Prohibited Substances.

Allowed Delinting for Organic Cottonseed (7 CFR §205.601(n); NOP 5034-1):

- Hydrogen Chloride (HCl gas, CAS #7647-01-0):

The only synthetic substance permitted for delinting organic cottonseed.

Listed under 7 CFR §205.601(n): "Hydrogen chloride (CAS #7647-01-0) - for delinting cottonseed for planting."

Must be followed by neutralization (e.g., calcium carbonate or lime).

- Prohibited Alternatives:

Sulfuric acid and other acids are not permitted for delinting organic cottonseed.

Certifier Requirements:

- Verify delinting method complies with NOP (hydrogen chloride gas only).

- Ensure neutralization and proper handling records.

- Confirm seed is untreated with prohibited substances after delinting.

3. References

- NOP 5029-1 - Seeds, Annual Seedlings, and Planting Stock in Organic Crop Production (Response to Comments), Sept. 2018. <https://www.ams.usda.gov/sites/default/files/media/5029-1.pdf>

- NOP 5034-1 - Seed Preparations (National List).

- 7 CFR §205.204 - Seeds and planting stock practice standard.

- 7 CFR §205.601(n) - Allowed synthetic: Hydrogen chloride for cottonseed delinting.

- Texas A&M AgriLife Organic. *Texas Organic News* – July 25, 2022. Page 4 includes discussion of NOP 5029-1 and the clarification that non-organic cottonseed delinted with sulfuric acid is permissible if the acid is neutralized and no residue remains on the seedcoat. Available at: <https://agrilifeorganic.org/wp-content/uploads/2022/07/organic-newsletter7-25-22.pdf>