STRENGTHENING ORGANIC SYSTEMS, LLC

October 01, 2026

Ms. Michelle Arsenault
National Organic Standards Board USDA AMS-NOP
1400 Independence Ave, SW
Room 2648, Ag Stop 0268
Washington, DC 20250

Docket: AMS-NOP-26-0892

RE: Handling Subcommittee - Petition to Add Potassium Metabisulfite (KMBS) for Wine Labeled "Made with Organic Grapes"

Dear NOSB Handling Subcommittee,

Strengthening Organic Systems (SOS) appreciates the opportunity to provide a brief update regarding the petition submitted on behalf of the Organic Winegrowers Network to add potassium metabisulfite (KMBS) to the National List for use in wine labeled "made with organic grapes."

We introduced this petition to the Board during the Spring 2026 meeting. Since that time, the National Organic Program has completed its review of the petition and determined it to be complete, allowing it to move forward to the NOSB for consideration.

The petition addresses a practical barrier facing organic wine production. Sulfur dioxide is already permitted for use in wine labeled "made with organic grapes," but the currently available form presents sourcing, handling, infrastructure, and worker-safety challenges for many wineries, particularly smaller operations.

As we noted in the spring, these barriers can contribute to a significant disconnect between certified organic wine-grape production and the finished wine. Organic grapes may be grown on certified organic vineyards, but if the winery does not pursue organic certification, that organic production effectively disappears from the finished wine label. This represents a lost opportunity for shoppers seeking out wines made with organic grapes, while also limiting the market recognition and value of the organic practices being implemented in the vineyard.

The KMBS petition does not seek to change the role of sulfur dioxide in organic wine production or the existing limitations on its use. Rather, it seeks to provide wineries with a practical alternative source of sulfur dioxide that can be used within the existing regulatory framework.

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Providing a workable tool for wineries can help carry the investment made in certified organic vineyard production through the winery and ultimately to the label consumers see on the bottle.

We appreciate NOSB's review of the petition and look forward to continued engagement with the Handling Subcommittee and full Board as its consideration moves forward.

With gratitude,

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