

October 16,2006

Dear NOSB members,

I want to personally thank the NOP for the opportunity to serve on the NOSB. I could not attend the farewell meeting last spring due to lots for crops being ready for harvest and few available hands to do the work. I welcome the new board members and hope that they are quickly learning and meeting the awesome responsibility of serving as a NOSB member. The best advice I can offer is to respect one another and the NOP staff, be consistent with your recommendations, learn the history of prior board recommendations and do extensive analysis, research and critical thinking before you vote on an action item.

I would like to comment on the agriculture/nonagriculture definition. I feel that your arguments for placing fungi under the Livestock definition can be justified based on the OFPA definition as stated in your recommendation and there would be no necessary rule changes for substances such as yeast and other non-bacterial substances other than removing them from the non-agricultural substance list. However, it is my opinion that the NOP/NOSB would have to collaboratively work to develop micro-organism standards within the general Livestock category similar to the process for the development of aquaculture standards. I base my judgement on the fact that the culture or growing of microorganisms such as yeast is dramatically different from animals. Since most of the Livestock Standards deal with feed, animal health and welfare, source of initial stock animals, and general animal husbandry practices, they do not address the factors that should be considered for culturing organic microorganisms with the exception of growing the organisms on organic food sources such as grains. I recommend that a task force be established to address specific standards that should be incorporated under the general Livestock Standards category for microorganisms other than bacteria. This will enable operations culturing microorganisms (other than bacteria) to meet consistent standards that are defined and appropriate to their industry and consistent with OFPA.

As far as your recommendation to change the definition of agricultural substances, I believe that the committee should spend more time analyzing the history of the substances on the nonagricultural substances list that you mentioned- gums, pectin etc. Your argument to alter the definition concerns me because it requires a change in the historical basis by which substances

have been added to the list. Your arguments do provide some justification but I feel that the joint committees need to work more on this issue. Additionally, it makes sense to wait for the proposed clarification of the synthetic vs. nonsynthetic document since these issues appear to have mutual concerns for the industry. I do not recommend the deletion of bacterial culture in the definition until there is an understanding on part of the committee as to why it was incorporated into the original definition.

Therefore, I recommend that the NOSB accept the argument as presented for yeast under the current definition of Livestock and remove it from the nonagricultural substance list. Further, I recommend the establishment of a microorganism task force to develop comprehensive standards for microorganisms similar to the aquatic task force. I recommend that the board consider moving Chilean Nitrate-with the annotation for Spirulina culture to the Livestock prohibited natural list, since microorganisms such as Spirulina would be considered Livestock rather than a crop. Finally, I recommend that you defer your decision on the definition of Nonagricultural substance and address some of the concerns mentioned previously.

Again I appreciate the level of commitment and patience of the entire Staff at the NOP and those volunteers serving on the National Organic Standards Board.

Sincerely,

Rose Koenig