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Quality Assurance International
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Multi-Site Organic Certification: QAI served on the OTA Grower Group Task Force and agree with their recommendation for *implementing* Grower Group Certification. We strongly agree that group certification should be made available for small growers who otherwise might not be able to afford organic certification on an individual basis. Additionally U.S. desires their organic products, which many times cannot be produced within our borders and would not be available to us without this method for organic certification.

Who are small farmers? The USDA-NOP defined small farmers in the NOP Preamble as one with 25 acres and a gross income of \$30,000. Perhaps that USDA definition is one that all cooperative members could live with. I don't think it's practical to limit a small farmer to one that has less than \$5000 gross income as some have suggested. Those farmers are exempted from certification, and our goal is to bring more farmers into certification.

Does a Grower Group Internal Control System improve organic over-site? Yes, just as HACCP improved food safety; so does having persons that are familiar with local customs and operations improve the organic certification process. Someone who is familiar with the operation knows where to look for the flaws and weaknesses. Do these internal control officers replace third party certifying agent inspectors? No. Just as a QA Department does not take the place of FSIS or FDA, but serves as an extension to assist those government auditors to enforce the food-safety audits, so does the ICS serve as an extra set of eyes to protect organic integrity. Are some mistakes made with Internal Control System multi-site organic operations? Yes, just as there are mistakes made in any organic operation. But they make continuous improvements in their OSP's to become more effective; just as I have seen many individual farmers make great improvements in their organic operations over time. But even though some mistakes have been made, QAI urges NOP to "not throw out the baby with the wash water." Let's just better develop stronger criteria for certifying this important constituent of organic certification.

QAI acknowledges the reasoning of the OTA Task Force when it stated, "Let's just work on grower group cooperatives for the present. We will address the need for further discussion of other multi-site groups at a later date." QAI understands that logic; we also did not want to loose the cooperative grower groups that have been formed all over the world; and NOP had threatened to totally eliminate group certification. Everyone reacted with fear.

But QAI urges NOSB and NOP to not forget that many retail store chains have been certified for the past 5 years under this system. These retail store corporations have spent thousands of dollars to develop comprehensive Internal Control Systems under which they implement their organic certifications. They have spent years developing their

corporate images and reputations around being certified organic. They are proud of their organic certification, and they take it very seriously. Consumers will be the losers if these retail stores surrender their exempted certification. Please continue to address multi-site certification to allow these businesses to operate as certified entities under their organic system plans.

Commercial Availability of Seed: QAI supports this recommendation, except for the requirement that certifiers submit their client's list of non-available organic seeds to NOP and organic seed trade associations. We feel that this is too labor extensive, creating undue hardship for certifiers and producers.

DL-Methionine: QAI supports the Livestock Committee's 2nd proposal to extend the use of DL-Methionine until October 1, 2010. Please allow the organic poultry industry the additional two years to find alternatives to using DL-Methionine.

Ag versus Non-Ag: QAI came to support the Materials Working Group's Option D, but as revised by Oregon Tilth, (DD) for the definition of non-agricultural substances, but we also like the simplicity of the B+ proposal for changing the 205.605 title to be "Non-Organic Substances" and applying non-commercially availability for both .605 and 606. Perhaps NOSB can incorporate the suggestions of both these two options to finally put this Ag. versus Non-Ag. "baby to bed."

Hydroponic certification: QAI does certify hydroponic operations. We ensure that all inputs are allowed under .203 or .601. Hydroponic systems typically produce more products per acre than any field based system, and many times recycle their water sources; as such they are helping to protect our environment.