

## NOSB ITEM FOR PUBLIC COMMENT

The National Organic Standards Board (NOSB) is seeking public comment on recommendations regarding ***NOSB Working Draft: Compatibility With Organic Production And Handling*** until November 27, 2003. With respect to receipt of comments by the NOSB during the comment period, the following provisions have been established to ensure that your comment has the greatest probability of being received and reviewed by the Board:

- **Mail:** Persons may submit comments on listed Board recommendations by mail to: The National Organic Standards Board; c/o Keith Jones; Room 4008 - South Building; 1400 and Independence Avenue, SW; Washington, D.C. 20250-0001.
- **E-mail:** Comments may be sent via internet to respective Board committees by submitting an E-mail to Board committee E-mail accounts provided with each recommendation.
- **Fax:** Comments may be submitted by fax to (202) 205-7808.

Clearly indicate if you are for or against the Board recommendation or some part of it and why. Include recommended wording changes as appropriate. Include a copy of articles or other references that support your comments. Only relevant material should be submitted.

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### NATIONAL ORGANIC STANDARD BOARD WORKING DRAFT: COMPATIBILITY WITH ORGANIC PRODUCTION AND HANDLING ADOPTED OCTOBER 24, 2003

#### ISSUE:

The NOSB has been asked to assist the National Organic Program by obtaining public input and issuing a recommendation on the following question: What are the factors (reasons, issues, parameters, strictures, limitations) and constraints that the National Organic Standards Board should use to determine a substance's compatibility with a system of sustainable agriculture and its consistency with organic farming and handling?

#### **NOSB Guidance Document on Compatibility with a System of Sustainable Agriculture and Consistency with Organic Farming and Handling**

In order to determine if a substance, its use, and manufacture are compatible with a system of sustainable agriculture and consistent with organic farming and handling, and in consideration of the NOSB Principles of Organic Production and Handling, the following factors are to be considered, when applicable:

- a) Does the substance promote plant and animal health by enhancing soil physical, chemical, or biological properties?
- b) Does the substance encourage and enhance preventative management?
- c) Does the substance promote the use of renewable resources and recycling, and reduce dependency on external inputs?
- d) Does the substance have a positive influence on the health, natural behavior, and welfare of animals?
- e) Does the substance satisfy consumer expectations regarding the authenticity and integrity of organic products?
- f) Does the substance promote the economic viability of organic farm operations?

- g) Is the substance mined, manufactured, or produced through reliance on child labor or any violations of International Labor Organization (ILO) conventions?
- h) Is use of the substance consistent with other listed uses of the substance?
- i) Is the substance consistent with other substances historically allowed or disallowed in organic production and handling?
- j) What are the experiences in foreign markets with use of the substance?
- k) Is the substance compatible with the Precautionary Principle? i.e. when a substance, its use, and manufacture raise concerns, precautionary measures should be taken when scientific data is not fully established. The proponent of a substance should bear the burden of proof to demonstrate compatibility.