

Emily Brown Rosen
25 Independence Way
Titusville NJ 08560

The National Organic Standards Board
c/o Keith Jones
Room 4008 - South Building
1400 and Independence Avenue, SW
Washington, D.C. 20250-0001

March 15, 2004

Dear NOSB members:

Thank you for the opportunity to comment on the NOSB's revised January 20, 2004 draft: "Compatibility with Organic Production and Handling." Due to a pressing work schedule and lack of time for internal review within OMRI, this letter is not an official OMRI position and represents instead my personal opinion as a member of the organic community.

I greatly appreciate the NOSB considering the previous OMRI comments and modifying the recommendation accordingly. The resulting changes add clarity and improve the overall usefulness of the criteria. I especially appreciate the revision and inclusion of item (k) "Is there adequate information about the substance to make a reasonable determination on the substance's compliance with each of the other applicable criteria?" This is a useful adaptation of the precautionary principle that can be uniformly applied and has not been clearly expressed elsewhere as a criterion for the review process. I also welcome the addition of item (l) "Does use of the substance have a positive impact on biodiversity?" This is an important concept for sustainable agriculture not specifically addressed elsewhere.

As a minor point, under item (i) you noted in your summary that there were no objections to this wording: "Is the substance consistent with other substances historically allowed or disallowed in organic production and handling?" OMRI stated previously and I believe that this criterion would be more meaningful if phrased "Is the use of the substance consistent with other substances historically allowed or disallowed in organic production and handling?" As NOSB is aware, a substance may be used in many ways and the specific way it is used affects the decision to approve or restrict its use.

I do not support inclusion of the new item (m), "Does the substance facilitate the development of new organic products?"

The NOSB gave no explanation or justification for this addition. This question is not necessary and the intent is not clear in this case. The petitioners are already asked to provide a petition justification statement that in most cases will provide ample reasoning as to why this specific substance is perceived by the applicant as *necessary* for a requested use. The ability to facilitate product development in itself is not a measure of sustainability or compatibility with organic agriculture, and inclusion of this criterion may be used as justification in itself. In many cases

new product development is based on economic factors. As OMRI stated in its November 2003 comments, short-run economic considerations should be left outside the scope of this criterion. While innovation and new technologies should be encouraged when they are sustainable and meet organic principles, I believe the factors for making these decisions on compatibility and sustainability are well expressed in the other criteria in this list, which are based primarily on environment, health, and organic integrity.

I urge that item (m) be deleted, and other items remain as proposed (with the minor correction in item (i) as suggested, from the January 30, 2004 draft.

Respectfully submitted,

Emily Brown Rosen
25 Independence Way
Titusville NJ 08560