

Materials

It seems strange standing on this side of the room talking to the board when I know what you are thinking, here he goes on materials again. You are right.

1. To date - This board has reviewed fewer than 20 materials since the April 1997 meeting in Indianapolis. In that same period the organic industry has grown substantially and the present certification organizations had to approve materials to meet this growth.
2. I have talked many times about the materials lists that the California Organic Food Advisory Board established for livestock and processing materials in 1998. These lists were established based on the materials lists of active certification organizations in California (CCOF, OTI, QAI), the Washington State livestock list and the NOSB. Our livestock list contains 85 materials of which 9 are prohibited, leaving 76 materials of which the NOSB has reviewed only 18 or 23%. The processing list contains 140 materials of which 22 are prohibited. Of the remaining materials the NOSB has only reviewed 55% or 66 materials. Granted that many of these materials might be what the NOSB, or those in the industry, would call natural-- they still must have a preliminary review. This review must be based on the definition of synthetic found in section 6502(21) of the OFPA. To understand why your materials committee needs to make these reviews, one only needs to look at Corn Starch. Before this board began to do TAP reviews in 1995 its members felt that corn starch was a natural material. Then it was learned that SO₂ was used in the steeping process, which might make it a synthetic under the section 6502(21) of the act. This is why the NOSB did a full TAP review on corn starch. What other materials on the California list might need a full TAP review?
3. When the present proposed rule was published, OMRI asked their certifier members what materials they were approving for use in organic production that were not on the proposed national material lists. The reply was that there were 169 materials presently in use which must be reviewed, (crops 43, Livestock 38, processing 87). Some of the 169 items are groups, such as inerts, vaccines, seed treatment, amino acids, anti-forms etc., which if reviewed individually, as required in section 6517(b) of the act, would make a list of well over 200 materials needing review.
4. The industry has asked the USDA for an 18 month implementation period after the final rule is published. If the rule is published in December of this year that would make the implementation date sometime in June of 2002. The board normally reviews around 20 materials a meeting, if your review process was organized better, like the meeting in Orlando, you could do more. The board established a timeline in 1999 so that the industry would have time to comment on TAP reviews prior to any board vote on the materials. If you try to review materials in October you cannot meet your own timeline which will again upset the industry. So based on 3 meetings per year this board should finish the review of the OMRI list some time in 2004. Once you approve a material and the Secretary agrees, it still must be published in the Federal Register for comment prior to being added to the national list. This can add another 6 months to a year to the approval process.
5. The board has established a procedure for the industry to submit materials for review. The National Organic Program told the industry that this procedure would be published prior to this meeting. Please do not wait any longer for this program. Start your review today using the list from OMRI. They have done your preliminary work. Remember their list of organic materials needing to be reviewed by this board will take you over 2 years to complete. If you wait to get materials for review from the Federal Register procedure the timeline to finish will be so long that the new members of this board will be long gone before the reviews are done.
6. Remember the OMRI list reflects the materials approved by present certification organizations for use by all segments of the organic industry to produce the goods consumers are buying today. When the June 2002 implementation date rolls around what is the organic industry to do if the materials they are using today are not part of the new rule? Shut down and wait for this board to review their materials? I think Not. The industry expects to be using their presently approved materials when the new rule goes into effect. It is up to this board to make sure they can. If you do not, the pressure from Congress and the legal system, let alone the OUTRAGE from consumers when they can't the products they have been purchasing, may be more than this program can stand.