

NOSB Public Comment 10-23-03, Jim Pierce, Organic Valley, 898 words

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Like the swallows to the cliffs of Capistrano or the buzzards to Hinkley Ohio the NOSB has returned to the Barcelo' Hotel in Washington DC for their fall migration. A lot of the usual bird watchers are here to witness the spectacle along with plenty of fresh curiosity seekers. Ever the optimist trapped in a cynics body I honestly hope no one leaves here disappointed but am glad to have this opportunity to illuminate some concerns.

For the record my name is Jim Pierce, self appointed Certification Czar at Organic Valley, a Certified Organic Farmer owned Marketing Cooperative proudly boasting over 600 members moving over a million pounds of organic milk every day. My main interaction with your Board, besides Street Theater, has been to assist in championing 17 materials for inclusion on the National List for Livestock use. My constituency is confused and frustrated. The messages they are hearing from the National Organic Program are mixed, muddled or non-existent. Especially, recently, concerning Livestock Materials. I found it very disturbing to learn that the agenda for this meeting had been usurped, that nothing from your Board's Committee Workplans is going to be advanced, that the two proposed rule amendments are stalled, and that the third docket, the one that matters most to the 600+ Organic Valley farmers since it will presumably include Livestock Materials and Recommendations is not even scheduled for release.

The challenge today is like a High School Essay, we have all been given the same assignment, to write a five minute essay titled "In substance review and evaluation, what constitutes compatibility/consistency with a system of sustainable agriculture/organic production and handling." Better than "What I Did On My Summer Vacation".

Fortunately for you all it's open book and most of the answers are right in front of you.

God Bless Jim Riddle, the Policy Committee and everybody that assisted them to compile this draft document titled "Compatibility With Organic Production and Handling". Friends this wheel has been rolled. In the 1990 Farm Bill Sustainable Agriculture is defined to include "an integrated system of plant and animal production practices". In 1994 an NOP report to the NOSB titled Moving Towards Sustainability states; "Organic management methods... Protect the environment, minimize pollution, promote health and optimize biological productivity." And my favorite nugget of insight from the 2001 Codex Guidelines "the consumer will not be deceived concerning the nature, substance and quality of (organic) food.

To this most helpful guide I would offer you another quote, first poorly pronounced in the native dialect then translated. "Ua mau ke ea o ka aina i ka pono. The life of the land is perpetuated in righteousness. That's the State Motto of Hawaii, first quoted by King Kamehameha the Third in 1947 after being passed along countless generations as part of the oral fabric. The life of the land is perpetuated in righteousness. Indigenous peoples, anyone in fact that puts their hands into dirt on a regular basis understands this instinctually. Righteousness IS sustainable and compatible. Righteousness can be synthetic or processed, certainly righteousness can be a recent discovery. But righteousness is also AVAILABILITY, it's TRANSPARENCY and ACCOUNTABILITY and CONSISTENCY and unfortunately what the Farmers and Handlers are getting from the National Organic Program is not entirely Righteous.

I urge you as a Citizens Advisory Board representing us to stand strong in solidarity and to demand better service from the USDA Program which you have been mandated by law to advise. We need the tools and recommendations that you worked so hard on NOW! The four year sunset on Methionine is over half gone putting the organic poultry industry in a very tight spot. Ten other livestock materials are trapped in a semantical vortex between FDA and USDA which could have and should have been resolved at an early September meeting that was unfortunately canceled. Even no brainer technical corrections like the reinstatement of Carregeenan to the list has taken over three years jeopardizing the certification of otherwise righteous handlers. I repeat we need these tools NOW.

I would also remind you that the paradigm of Organic Production is for better or worse practiced in the conventional world. Economic practicality must be weighed alongside animal welfare and environmental sustainability.

The National Organic Program celebrated its first birthday three days ago. An unruly infant this baby is looking like it will be a Terrible Two for the record books. I shudder to even think what this is going to be like as a teenager.

Maybe I'm being too critical. From a comfortable distance the NOP is working pretty well for most people in most situations. The USDA Organic Seal is enjoying significant respect by consumers, the NOP web site has improved dramatically and at least one blatant attempt to circumvent NOP process through appropriation amendment was resoundly defended. All with an NOP that is inarguably under staffed, without adequate resources and forced to sail in uncharted waters. Stick those feathers in your cap understanding that there is still a lot of work to do.

Paint a clear bright line. Don't leave here without determining exactly what constitutes compatibility and consistency with a system of sustainable agriculture and organic production and handling and you will have once again accomplished the excellent work that we have come to expect from you all.

Thank you and God Bless You.