

From: Mathews, Richard
Sent: Monday, April 22, 2002 8:58 AM
To: Benham, Katherine
Cc: Pooler, Bob; Strother, Toni; 'kim.burton@jmsmucker.com'
Subject: FW: Removal of Chilean Nitrate (Sodium Nitrate) from National List

Importance: High

Please forward this to the Board members today and include it as a comment in the meeting book.

-----Original Message-----

From: Steven Harper [mailto:steven.harper@smallplanetfoods.com]
Sent: Friday, April 19, 2002 5:11 PM
To: nosb Owasu Bandele (E-mail)
Cc: Mathews, Richard; Pooler, Bob
Subject: Removal of Chilean Nitrate (Sodium Nitrate) from National List
Importance: High

I have talked with a number of very active persons in the agriculture sector of the organic industry regarding the fact that Chilean nitrate is being considered for removal from the National List for use in Production. I believe that the consideration for removal should be deferred for the following reasons.

1) There is no indication in any of the announcements that Chilean Nitrate is being considered for removal. The official announcement from the USDA mentions materials being considered for "inclusion" on the National List. Other announcements in the industry based off of the USDA announcement also mention that materials being considered are for "inclusion". The agenda makes no mention one way or another.

2) This is the first material that is being considered for removal from the National List. Until this time all materials have been considered for inclusion. I believe that we need to be much more diligent about notifying the industry about removal of materials because production practices, formulations, etc have been put into place based on the lists. It is more difficult to change established practices to delete materials than to add them as they become available.

3) The previous NOSB struggled long and hard to work out the compromise position that is currently annotated. I believe to not give the industry time to respond to a practice that has been allowed, needed by some producers and used since the inception of the organic industry is clearly not in the best interest of the organic community and is clearly not fair.

4) The public also has no knowledge of any current recommendations of the Crop Committee regarding Chilean Nitrate. This makes it very difficult for response at this point if a producer is even aware that the material is being considered for removal.

Please give serious thought to deferring action on the removal of Chilean Nitrate until the next NOSB meeting.

Best Regards,

Steven Harper Ph.D.
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