

Benham, Katherine

From: Chris Schreiner [chris@tilth.org]
Sent: Friday, March 05, 2004 3:49 PM
To: NOSB PDC
Cc: Jones, Keith
Subject: Comments: "Compatibility with Organic Production and Handling"

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

Dear NOSB members:

Thank you for the opportunity to comment on the NOSB's draft "Compatibility with Organic Production and Handling."

In general, Oregon Tilth supports the January 30, 2004 draft. The criteria established in this draft provide a firm basis for evaluating substances to determine if they are compatible with a system of sustainable agriculture and consistent with organic production and handling. Oregon Tilth supports previous general comments that there should not be a numerical summing of the items, but consideration of all the items as a whole should show relative compatibility of a material with organic production and handling.

In addition to general support of items a) through l), Oregon Tilth strongly endorses inclusion of item g), as it takes into consideration social equitability issues.

Oregon Tilth supports the principles underlying item e) and we offer the following comments. Item e) correctly recognizes consumer confidence and support as integral to the continued success of organic production and handling systems. However, we believe that "expectations" of current organic consumers vary widely, as demonstrated in various organic consumer surveys and demographic studies. In other words, current organic consumers have varying degrees of understanding of organic standards, and the motivations which drive consumers to

purchase organic products vary based on differing degrees of understanding as well as differing values. We also agree with previous comments that some consumers lack a thorough understanding of current food production practices and may have unrealistic or impractical expectations. Continued efforts of consumer/public education on organic standards and sustainable food production systems is critical to empower consumers to make well-informed decisions in the marketplace.

Oregon Tilth believes organic consumers' expectations must be considered in the criteria but that such expectations currently lack consistency, which makes consideration difficult. As such, we encourage the NOSB to consider materials' with an awareness of the potential for significant or widespread erosion of consumer confidence in, and support of, the organic label. Such a situation must be avoided.

Finally, Oregon Tilth does not support inclusion of item m) - "Does the substance facilitate the development of new organic products?" We find that item m) has nothing to do with compatibility with a system of sustainable agriculture and consistency with organic production and handling.

We urge that Item m) be deleted, and all other items remain as proposed in the January 30, 2004 draft. Thank you for your consideration.

Respectfully submitted,

Chris Schreiner
Oregon Tilth