



National Organic Standards Board
Attn: Robert Pooler
Agricultural Marketing Specialist
USDA/AMS/TM/NOP
Room 2510-S, Ag Stop 0268
P.O. Box 96456
Washington, D.C. 20090-6456

August 19, 2002

Re: Sodium (Chilean) Nitrate

Dear Robert and NOSB Board:

My name is Fred Rappleye and I represent the family owned companies of Grimmway Farms and Cal-Organic Vegetable Company in Bakersfield, Ca. Our companies have been farming organically since 1984 and are currently farming organic vegetables on over 18,000 acres. We would like to ask for your assistance in supporting the current USDA – National Organic Program Rules and Regulations regarding the use of Sodium (Chilean) Nitrate for organic farming [Section 205.602 (h) allowing usage up to 20% of the crop's total nitrogen requirement].

Sodium Nitrate is a mined mineral (naturally occurring in nature) from northern Chile that has proven to be vitally important to the organic vegetable industry. The quick nitrogen release provided by this product is crucial in the growing of short duration crops and crops grown during cold season harvest. It also provides our products with the lasting capacity to weather long transportations to broader markets. The material has also been approved for organic farming in California since the inception of the California Organic Foods Act of 1990. This product accompanied by compost at preplant, along with other fertilizers (i.e. Processed Manures) is absolutely necessary in the growing of high quality organic vegetables.

We feel the use of this product is important to the organic movement and are planning to speak on its behalf at the next National Organic Standards Board (NOSB) meeting in Washington, DC.

Sincerely,

Fred Rappleye
Organic Certifications Director
(661) 858-1701 (Office)
(661) 858-0636 (Fax)
frappleye@grimmway.com

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Whole Foods Produce - West
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(831) 722.9055 fax

From: Edmund La Macchia
Whole Foods Market, National Produce Coordinator

9-11-02

To Whom It Concerns,

Whole Foods Market supports the continued limited use of sodium nitrate (Chilean nitrate). We believe appropriately used it does not represent a significant environmental or food safety risk. The growth of organic agriculture in the United States has played an important role in stabilizing the family farm. In addition it has influenced agriculture at large to consider more environmentally sensitive practices. The new organic law is indicative of how demand in the market place can play a role in creating positive change. We at Whole Foods Market encourage you to be sensitive to the importance of market factors in terms of changing long-standing practices of the organic community before the appropriate substitutes are substantiated. We believe prohibiting sodium nitrate at this point would reduce the availability of organic product damaging the current momentum that the new organic law was created to support.

Founded in 1980 in Austin, Texas, Whole Foods Market is the world's largest natural and organic foods supermarket. In fiscal year 2001, the company had sales of \$2.3 billion and currently has more than 130 stores in the U.S. The Whole Foods Market mission is to find success in customer satisfaction and wellness, employee excellence and happiness, enhanced shareholder value, community support and environmental improvement. Whole Foods Market, Fresh Fields®, Bread & Circus®, Wellspring® and Harry's Farmers Market® are all registered trademarks owned by Whole Foods Market. The company employs more than 23,000 team members.

Source Organic

Phone: 831-462-5870 or 800-625-5661 Fax: 831-476-8002 Internet: www.sourceorganic.com



Source Organic
PO Box 1218
Soquel, CA 95073
19th August 2002

National Organic Standards Board
Attn: Robert Pooler
Agricultural Marketing Specialist
USDA / AMS / TM / NOP
Room 2510-S, Ag Stop 0268
P.O. Box 96456
Washington, DC 20090-6456

To whom it may concern:

As a representative of the largest National Organic Produce Distributor, Albert's Organics, I feel obligated to express my concern with the possible decision to ban sodium nitrate from the list of optional organic production materials. Completely eliminating the use of sodium nitrate will increase crop failure and set the Organic Industry back years in terms of productivity and quality. Sodium nitrate is an important aspect of the organic growing process in the desert regions, especially during the winter months. We strongly urge you not to ban the limited use of sodium nitrate.

Respectfully Yours,

A handwritten signature in cursive script that reads "Melody L Meyer".

Melody L Meyer
National Procurement Director

Goodness Greeness

5959 South Lowe, Chicago, Illinois 60621



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Goodness Greeness
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Chicago, IL 60621

We are in total support of the continued limited use of sodium nitrate as a tool for the organic industry. It seems only reasonable to allow the organic farmers of America any and all opportunities to succeed.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Robert Scaman', written in a cursive style.

Robert Scaman
President



WM. BOLTHOUSE FARMS, INC.
7200 EAST BRUNDAGE LANE • BAKERSFIELD, CA 93307-3099
661/ 366-7205 • FAX: 661/ 366-2834

National Organic Standards Board / USDA

September 12, 2002

Dear Members of NOSB,

I am writing to express my concern prohibiting the use of Chilean Nitrate as an organic crop nutrient. The use of Chilean Nitrate is critical for vegetable production during periods of cooler weather. The current limitation of Chilean Nitrate to 20 percent of the total nitrogen supplied for crop use has been effective for many years. The use of Compost, Manure, Leguminous cover crops and other products used as a source of nitrogen is limited during cooler periods of the year and the use of Chilean Nitrate for most vegetable crops becomes essential in order to prevent economic losses or total loss of the crop.

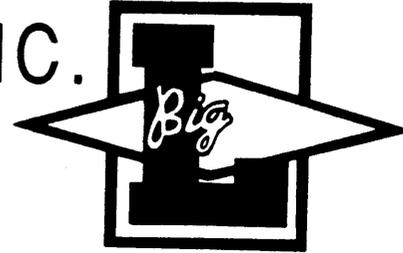
The loss of Chilean Nitrate, as an organic crop nutrient, will unavoidably cause economic hardships to many Organic Growers throughout the country. I fully support the use of Chilean Nitrate (sodium nitrate) as stipulated in the USDA Final Rule 205.602(h).

Malcolm Ricci
Organic Program Coordinator
(661) 366-7209 ext.1528



LEHR BROTHERS, INC.

dba.. BIG™ L™ PACKERS
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POTATOES

September 10, 2002

National Organic Standards Board
Attn: Robert Pooler
Agricultural Marketing Specialist
USDA/AMS/TM/NOP
Room 2510-S, Ag Stop 0268
P.O. Box 96456
Washington, D.C. 20090-6456

Dear Mr. Pooler

I am Peter Belluomini, grower and manager of BelLehr Organics in Bakersfield California. We now have 500 acres of certified organic ground with potatoes being our major crop. I am writing today to ask for your support in our quest to retain the use of Sodium Nitrate as a vital tool in our cultural practices.

While Sodium Nitrate is only allowed to make up 20% of the crops total Nitrogen program, it is essential to the possible success of the crop. This is due to this products availability and quick release to the plant. In potatoes, as in most vegetable crops, it is the timing of the Nitrogen application, as well as the amount, which proves crucial. In other words, all the compost in the world means nothing if the Nitrogen is not available the day the plant needs it.

In the six years that I have grown organic potatoes, I have experienced a phanomanom not uncommon to all farmers of all crops. My costs have only risen, while an increase in certified acres have put downward pressure on the prices I can receive. The products proposed to replace Sodium Nitrate are less effective and three to four times the cost. In an era where energy, labor, and worker's comp costs continue to sky rocket, it is essential that growers retain every economical tool available. Please aide our industry and save the use of this proven and economical product.

Sincerely,

Peter J. Belluomini



September 3, 2002

TO: National Organic Standards Board Members
National Organic Program, USDA

FROM: Craig Weakley, Vice President of Agriculture

At your September NOSB meeting, you will be discussing and voting on a Petition to remove Chilean nitrate from the National List of approved materials for organic farming. Because Chilean nitrate is a "natural" (non-synthetic) material, changing its National List status to a "prohibited natural material" should not be done without compelling scientific evidence that its use on organic farms in accordance with Section 205.602(h) of the Final Rule is harmful to the soil, to soil biota, to the environment, and/or to human health. I urge you to vote against the Petition because of the lack of scientific evidence that the use of Chilean nitrate on organic farms is detrimental in any way.

During my four years as a member of the NOSB (1992 through 1996), Chilean nitrate was heavily researched, much discussed, and hotly debated by the NOSB Crops Committee (I was an NOSB Crops Committee member for four years) and by the full Board. The Board received much public testimony over a 3-year period (1992 – 1995) from all segments of the organic community on the use of Chilean nitrate by organic farmers. In fact, I can't think of another issue or material that was more thoroughly discussed and reviewed by the Charter NOSB. As you know, in November of 1995, following lengthy deliberation, the NOSB Recommendation to allow the use of non-synthetic Chilean nitrate with restriction (not more than 20% of the total nitrogen supplied to a crop; use of Farm Plan process to reduce use over time) was submitted to USDA.

Much like the ample public testimony about this material received by the Charter NOSB, the reaction by organic farmers and other members of the organic community to the NOSB Recommendation on Chilean nitrate was polarized: either you loved the Recommendation or you hated it. This has not changed since 1995. Thus, it was no surprise that an organic farmer who "hates" Chilean nitrate has recently submitted a Petition to prohibit its use in organic farming. But, just as the Charter NOSB could find no scientific basis (TAP Reviews) for prohibiting this non-synthetic fertilizer, the current Petition is not supported by scientific evidence that documents soil quality degradation, that documents detrimental effects on soil biota, that documents detrimental environmental effects, that documents detrimental effects on human health, or that

documents detrimental effects on water quality caused by the use of Chilean nitrate on organic farms. The alleged detrimental effects attributed to Chilean nitrate by the Petitioner and by one of the new TAP reviewers (Reviewer #3) are hypothetical and theoretical. In order to be consistent with the OFPA, a prohibition of this non-synthetic (natural) material must be based on scientific documentation showing that the use of the material in organic production is detrimental to the soil, the environment, and human health. Again, such documentation is absent.

Historically, Chilean nitrate has been allowed by most major U.S. organic certification agents (in recent years, some have prohibited the material in order to achieve IFOAM Accreditation). In fact, Chilean nitrate (with and without the current restriction to 20% of the total nitrogen applied) has been used by organic farmers for decades. If, in fact, there were detrimental effects to soil, soil biota, the environment, or human health, surely scientists, extension agents, and organic certification agents would have documentation of such problems. If it exists, why is this documentation absent from the Petition and from the three new TAP Reviews?

Two of the new TAP Reviewers (Reviewer #1 – PhD in Horticulture & Reviewer #2 – PhD in Soil Science) conclude that use of Chilean nitrate in accordance with the restriction in Section 205.602(h) will pose no harm to the soil, the soil biota, to water quality, or to human health. Reviewer #1 says: “Much is also made about the high salt index of sodium nitrate, but application of this product at the levels allowed under section 205.602(h) presents little risk in either of these regards.” “If used in moderation, none of these nitrate-containing materials would have serious effects on soil biota. The presence of significant quantities of nitrate in organically managed soils is not unusual; following breakdown of a cover crop, a buildup of 10 – 20 mg/kg NO₃-N is common. Therefore, the use of nitrate-containing fertilizer does not increase the pollution potential.” “It is true that the application of this product late in the crop cycle of leafy greens (the expected use pattern) would increase the nitrate concentration of the produce, but it would be very unlikely to result in levels deemed a health hazard by current standards.” “In summary, the risks associated with the use of sodium nitrate are minimal...” Reviewer #2 says: “In the manner it is used in organic production practices, minimal detrimental chemical interactions should occur.” “Applications of Chilean nitrate using best management practices should avoid environmental contamination.” “The soil microbial community should easily process the low level of perchlorate. Overall, the low level of perchlorate should not pose human health problems at the recommended application rate.” “However, since the current guidelines establish that Chilean nitrate application cannot exceed 20% of N application, this should minimize salinity problems.” The conclusion of these two agricultural scientists substantiates that there is no “environmental harm” basis for prohibiting Chilean nitrate.

Reviewer #3, who is apparently not a scientist, expresses several opinions about the potential for detrimental effects to be caused by Chilean nitrate use but offers zero scientific documentation to back the opinions. The quality of this “technical” review is so poor that it is of little value to the NOSB review process.

Two of the new TAP Reviewers (Reviewer #1 & Reviewer #3) express concern about the environmental impact of the mining of Chilean nitrate. While mining certainly creates an environmental impact, the organic community has a long-standing tolerance for the use of natural (non-synthetic) mined materials. Mined lime, gypsum, rock phosphate, sulfur, and potassium sulfate are all approved for use on organic farms by U.S. and international certifying agents. The fact that Chilean nitrate is mined is not a valid reason for prohibiting its use on organic farms.

Two of the new TAP Reviewers (Reviewer #1 & Reviewer #3) conclude that the use of Chilean nitrate is incompatible with a system of organic agriculture. Reviewer #3 draws this conclusion "given the points mentioned above." Since the "points mentioned above" by Reviewer #3 are his/her unsubstantiated opinions about the potential detrimental effects of Chilean nitrate use, the entire basis for his/her conclusion is unsubstantiated. Thus, his/her conclusion is erroneous. Reviewer #1 draws this conclusion based on the environmental impact of mining and the availability of "suitable alternatives" and in spite of his/her conclusion that "the risks associated with the use of Chilean nitrate are minimal." I do not believe that mining and the availability of suitable alternatives are compelling reasons to conclude that Chilean nitrate is incompatible with a system of organic agriculture. Several National List approved materials are mined and have suitable alternatives. In addition, the fact that Chilean nitrate use (with restriction) is currently allowed by some major U.S. certifiers and has been historically allowed by most major U.S. certifiers demonstrates that it is not incompatible with organic principles.

In formulating its Chilean Nitrate Recommendation to USDA, the Charter NOSB recognized the potential for the misuse of Chilean nitrate by organic farmers. But, because of the lack of scientific documentation of detrimental effects from Chilean nitrate use on organic farms, the Charter NOSB chose to recommend that Chilean nitrate be available for use by organic farmers with a use restriction (no more than 20% of the total N applied to a crop) and within the context of the Organic Farm Plan which requires organic farmers to maintain soil quality. Today, the concerns about the potential negative impact of Chilean nitrate use on soil quality, on the environment, and on human health remain unsubstantiated by scientific evidence. Nor are they validated experientially by organic certification agents or extension agents. So, again, there is no basis for prohibiting Chilean nitrate.

While there is a lack of science to support concerns about soil and environmental harm related to the use of Chilean nitrate, there is plenty of experience among organic farmers to support the need to retain this material as a fertilizer option for organic production. I have worked with west coast (California, Oregon, Washington) organic fresh market and processing vegetable growers (including tomatoes, corn, peas, green beans, carrots, potatoes, onions, lettuce, peppers, squash, broccoli, spinach, cauliflower, sugar snap peas, melons) since 1989. While all of these crops can be successfully grown without Chilean nitrate if the weather cooperates, it is common for at least one crop in the rotation (3 to 5 years) to need a Chilean nitrate application due to cold temperatures and/or wet soils that prevent adequate nitrogen release (from soil organic matter, compost, manure, etc.) for

proper crop growth and maturity. Because such weather conditions cannot be predicted, it is difficult to plan for them. Chilean nitrate, used in accordance with Section 205.602(h) of the Final Rule, gives organic farmers a tool they need to prevent economic loss associated with nitrogen deficiency created by excessive rainfall and extended cold temperatures. Alternative nitrogen fertilizers are inadequate to address the timing, solubility, and application methods needed to mitigate the impact of these weather events.

Over the past 14 growing seasons, I have had the opportunity to help a number of conventional farmers make the transition to organic. These new organic farmers (the future of our growing organic industry) must deal with a number of agronomic/horticultural challenges that are associated with crop production during the transition period. Providing adequate nitrogen to crops during the early years of soil-building is one such challenge. As pointed out by TAP Reviewer #2, Chilean nitrate is a valuable tool for new organic farmers during the initial soil-building period.

In its deliberations on Chilean nitrate, members of the Charter NOSB recognized that organic farmers are stewards of their soil (their most precious asset) and the environment. In that context, misuse of Chilean nitrate by organic farmers is both illogical and counter-productive. The Organic Farm Plan and the 20% use restriction (Section 205.602(h)) provide excellent regulatory protection from farmers who might attempt to “beat the system.” Allowing restricted use of non-synthetic Chilean nitrate is consistent with the OFPA, with organic farming principles, and with the organic standards of several U.S. organic certification agents. Additionally, Chilean nitrate is particularly helpful in assisting first time organic farmers during the transition period and, as such, serves as a bridge in their efforts to create a more self-sustaining farm system.

Organic farming is challenging enough. Please do not vote to prohibit Chilean nitrate use in organic crop production.

1220 N Street, Suite 409
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(916) 654-0433

September 11, 2002

Barbara C. Robinson
Deputy Administrator
Transportation and Marketing Programs
Agricultural Marketing Services
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Ms. Robinson:

The California Organic Food Advisory Board (COFAB) hosted a listening session for the California organic registrants in Salinas, California on August 6th, 2002. The purpose of the meeting was to allow the COFAB to assess the needs of the California organic producers with reference to materials currently up for the TAP review, especially Sodium (Chilean) Nitrate. Please find attached the minutes of the "Listening Session" and a list of participants.

The meeting participants were unanimous in their support of the current language regulating Sodium (Chilean) Nitrate. It was made clear to the Board that Chilean Nitrate is necessary for organic production in California. There would be a negative financial impact on the state's organic production if this material were to be completely prohibited. The commentors did not express a position on the petition to allow the material at a 100% level for the production of Spirulina, nor did the Board feel it necessary to take a position.

The California Organic Food Advisory Board urges the United States Department of Agriculture to continue to allow use of Chilean Nitrate as noted in the current regulations.

Sincerely,

Valerie Brown
Deputy Secretary

Attachments

Henry Nutter Center, Salinas, CA Aug. 6, 2002

COFAB Listening Session – DRAFT MINUTES

COFA Board Invoites public comment on petitions currently in front of the NOSB Materials Review:

Chilean/Sodium Nitrate:

COFA Board Comments:

- S. Carlsen/Chair Ag. Commissioners Association – "...consistent with good Ag. practices.
- S. Sweezy/Drtr SAREP – contractor for TAP process, explained process.
- B. Lundber/Farmer, Processor – does not use but stated that 25 years practices of allowing the material in organic farming would indicate that continued allowance is an issue of consistency.
- S. Lanini/Grower, Consultant – supports continued use at 210% restriction.
- S. Hawthorne/Consumer Advocate – "Not a consumer issue", questioned alternatives.
- R. Melnicoe/Science Rep – UC Extension – Supports current 20% use in organic practice and supports the Spirulina petition.
- J.Hall/Processor Rep. – Same as Melnicoe.
- S. Tekklu/Grower Rep. – Opposes use completely. Also questions ALTERNATIVES.
- T. O'Keefe/Environmental Rep. – Support current 20% use but discourages use in spirulina production due salt build-up.
- G. Timmons/Handler Rep. – Current 20% should continue – questions spirulina use.
- R. Crossley/Processor Rep. – 20% use should continue – views it at a trade and political issue between states.

PUBLIC COMMENTS–

Fred Rappley/Grimmway Farms

Supports 20% current status – they farm 18,000 acres, 50 different vegetables, view it as a tool that may be necessary.

Brian Leahy/CCOF (Repping aprox. 500 members)

Supports 20% current status – CCOF member need it as a tool and have historically allowed use.

Will Daniels/Natural Selection/Earthbound Farms –

Many of their growers do not use but they support the allowance as a tool for transition and unusual conditions.

Jake Lewin/QAI

No Position

Vance Kennedy/Hydrologist

No position but discussed other practices effecting soil and water.

MOTION: Request that CDFA, via letter, support the organic community in it's majority support to maintain the status quo and oppose the petition opposing all use of Chilean/Sodium Nitrate by growers as it currently stands in 7 CFR 205.

(This motion was brought to the Aug. 7 COFAB meeting and passed, unanimously.)

Respectfully Submitted, Gay Timmons, Vice Chair, COFAB

WILLIAM M. THOMAS
21ST DISTRICT, CALIFORNIA

CHAIRMAN
COMMITTEE ON WAYS AND MEANS
JOINT COMMITTEE ON TAXATION

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INTERNET:
www.house.gov/billthomas

Congress of the United States
House of Representatives

Washington, DC

September 16, 2002

The Honorable Ann Venneman
Secretary
United States Department of Agriculture
Room #200-A
14th Street & Independence, SW
Washington, DC 20250

Dear Ann:

Enclosed please find my comments that I submitted to the National Organic Standards Board regarding the continued use of sodium nitrate in organic farming.

In 2000, organic food sales reached \$7.8 billion. According to the California Certified Organic Farmers, California had almost 97,000 acres of organic acreage in 1999, a 38 percent increase since 1997, making California one of the largest producers of organic products in the world. In fact, one employer in Kern County farms organically on over 18,000 acres.

Sodium nitrate has been approved for organic farming in California since the inception of the California Organic Foods Act of 1990. According to industry sources, the use of sodium nitrates in conjunction with compost and other fertilizers is absolutely necessary in the growing of high-quality organic vegetables. I have reviewed the Technical Advisory Panel Review's report, and do not believe that it supports the discontinuation of the use of sodium nitrate in organic farming at this time. Thus, I ask you to support the continued use of sodium nitrate.

Thank you for your consideration in this matter.

Best regards,

William M. Thomas
Member of Congress

WMT/mdh
Enclosure

WILLIAM M. THOMAS
21ST DISTRICT, CALIFORNIA

CHAIRMAN
COMMITTEE ON WAYS AND MEANS
JOINT COMMITTEE ON TAXATION

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Congress of the United States
House of Representatives

Washington, DC

September 16, 2002

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INTERNET:
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National Organic Standards Board
ATT: Mr. Robert Pooler & Katherine Benham
Agricultural Marketing Specialist
USDA/AMS/TM/NOP
Room 2510-S, Ag Stop 0268
P.O. Box 96456
Washington, DC 20090-6456

It is my understanding that the National Organic Standards Board is currently considering the continued use of Chilean sodium nitrate. Thus, I now write to inform you that I agree with industry that the use of sodium nitrate in organic farming should be continued.

According to the organic vegetable industry sources, sodium nitrate has been approved for organic farming in California since the inception of the California Organic Foods Act of 1990, and its use in conjunction with compost and other fertilizers is absolutely necessary in the growing of high-quality organic vegetables. The quick nitrogen release provided by this product is crucial in the growing of short duration crops and crops grown during cold season harvest. Moreover, the industry also uses sodium nitrate to give their products the lasting capacity to weather long transportations to broader markets.

Industry's opposition to a ban on the use of sodium nitrate is supported by statements in the National Organic Standards Board of Technical Advisory Panel Review compiled by the University of California Sustainable Agricultural Research and Education Program. To begin with, the Review states that "no information was found detailing adverse chemical interactions with other organic inputs," and notes that there is a lack of information as to how effective Chile's environmental regulatory efforts have been. The Review also notes that "there are few organically approved alternatives that are as versatile and soluble as Chilean nitrate," and that "while there are a number of soluble nitrogen fertilizer sources approved for organic production, little information exists on effective management of these materials." The Review further states that these alternatives are generally not as efficient, and that "judicious applications of Chilean

nitrate, combined with inherently higher microbial activity and soil organic matter found in organic systems, may be adequate to mitigate off-farm consequences.”

Further support for the continued use of sodium nitrate is found in statements made by Reviewer 2. For instance, Reviewer 2 states “applications of Chilean nitrate using best management practices should avoid environmental contamination,” and that “overall the low level of perchlorate should not pose human health problems at the recommended application rate.” Reviewer 2 also notes that there are few, if any, available organic nitrogen sources that would behave as Chilean sodium nitrate does in organic production systems, and that the use of sodium nitrate “can remove some of the guesswork in delivering nutrients to crops.” Reviewer 2 notes that “organic growers currently have limited types of fertilizers that can be used,” and that “the use of smaller amounts of mined nitrate to sustain production seems logical until nutrient release from more processed organic fertilizers can be better predicted.”

Accordingly, as there is substantial evidence in the Review that does not support a ban on the use of sodium nitrate at this time, the use of sodium nitrate should continue.



William M. Thomas
Member of Congress



July 11, 2002

To Whom It May Concern:

Congratulations to the Natural Foods Industry for coming together on this landmark event that will take place on October 21st. Credibility has always been an issue the organic skeptics have held in the forefront of their crusade against us. Now, with the new U.S.D.A. standards about to take effect, their rumblings should be quieted.

Reflecting on the last fifteen years spent in the organic industry, I have seen tremendous maturing, massive growth, and many successes. I take pride in all the good we have accomplished. We have taken organic produce to new levels. We have bridged the gap between conventional and organics. You are now able to find organics in almost every conventional grocery store in America. We have taken the perception of organics with the "worm in the apple" and turned it around. In fact, in the case of our company, some mainstream chain stores are replacing major produce items and are going with organic produce exclusively. We have held ourselves to such a high standard that we are actually raising the bar of quality with our conventional counterparts.

Years ago in Watsonville, I remember sitting down with some of the founding fathers of this industry and discussing what we needed to do to take this business to the next level. I clearly recall the number one response was quality, consistency, and year round supply. All three of these goals are in jeopardy by totally banning sodium nitrate.

As a marketer and sales person in this industry I find myself very concerned with the decision to ban sodium nitrate from our list of optional organic production materials. The thought of what lettuce might look like in January, or the lack there of, without sodium nitrate is very unsettling to our customers and us. By banning this product we will be taking a large step backwards as an industry and will be doing a disservice to the consumer. We know that we will not be able to provide what they expect and demand without some use of this product. The quick and immediate response of sodium nitrate can be the difference between having a crop or not.

Cal-Organic Vegetable Company
a wholly owned subsidiary of
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We have painstakingly overcome hurdles of supply by going to the southern deserts of California and Arizona to farm in the winter months to satisfy the demand and the expectations of the natural foods consumer. We have seen that the conditions there don't always lend themselves to success without some help.

As someone who is responsible for feeding of thousands of people organic produce everyday, I feel it is my obligation to defend their right of supply by supporting the limited use of sodium nitrate. Countless people, young and old, depend on this food, people with health problems like cancer and allergies, mothers concerned about what their children ingest and people interested in a healthy alternative. How do we explain the decision to ban this naturally occurring product when we have nothing to offer them on the produce shelf? Is the reasoning because it is stripped mined like gypsum, marble, or oil? Oil is exactly like sodium nitrate; it is a finite natural resource. Are we going to stop using tractors or trucks to get our food to market? Are we concerned about the views of Europe and Japan? Do we explain to our consumers it is because of foreign concerns that the American consumer will suffer? Please help me find the right explanation.

Completely eliminating the use of sodium nitrate will increase crop failure and force more produce to come from Mexico. There is very limited ability to monitor growing and harvesting practices in Mexico, not to mention the lack of support for the American farm worker. We are so worried about food from foreign countries that we now want country of origin labeling on it.

The American consumer's concern for product safety and a desire for a healthy alternative has been the catalyst that has skyrocketed this industry's growth. Produce is the backbone to natural food industry. It is what has paved the way for the growth of our entire industry.

We have built this business by servicing a very unique and special group of people who have grown to appreciate who we are and what we do for them. We have built friendships, partnerships, and success stories all because of food. Simple, pure, natural food. We have tackled and overcome many obstacles and hurdles that we have faced. I think that we can surmount this one too. I believe that banning sodium nitrate runs the risk of undermining all the growth and success that we have accomplished over the years.

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Give us the tools to succeed, to grow and reach new heights. Don't send us back to the "worm in the apple" image. We need to keep the momentum moving forward in this industry. We don't need to dampen it by not having supply or quality.

Respectfully yours,

Todd Linsky
Director of Organics
Grimmway Farms/
Cal-Organic Vegetable Co.

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