June 6, 2001 NOSB Public Input
Respectfully submitted by Cissy Bowman, representing:
ICO, (Communications Director)
OFMA, (Vice Pres.) Acting Chair)
Certified Organic Farmer
Manager, Center Valley Organic Food Co-op
Chair, Indiana Organic Peer Review Panel

I would like to urge the NOSB to:

- Read S6517 of OFPA and comply with it when doing National List Reviews
  - There is no category for amino acids in S6517 C 1 (b);
- Read S 6518 (k) regarding the responsibilities of the NOSB
  - TRANSITION is not mentioned in OFPA and should not even be on an NOSB agenda
  - Prioritize and follow S 6518!
- Clarify livestock standard
- Work on creating a definition for "processed manure." Current compost standards are problematic for small farmers.
- Develop a procedure for reviewing petitions for the removal of material placed on the National List. Such petition will be forthcoming, especially with regard to material inappropriately placed (not in compliance with S6517)

Other comments / questions:

We were told to submit our questions on the Rule to the NOP webmaster. As of yet we have received no answers.

The entire TAP reviews should be posted on the ~~web~~ website, not just summaries

States need clarity on enforcement! As a member of the Enforcement Task Force, I know there have been no meetings for a year. USDA has indicated that states will enforce the Rule. How?

Methionine -
Research needs to be done into using buckwheat as a source of amino acids.

I strongly oppose the placement of amino acids and superphosphate on the National List.

Thank you

Another question:
Upon implementation, can a buyer still refuse to buy a specific product based on who certifies that product? If so, how is the "playing field" leveled?

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- ICO does not oppose the current COI language in the Rule as we are already compliant, however we do feel that certifiers should be allowed to create procedures to address COI problems without having to completely restructure themselves. An example of such a process is seen in the SARE program, where, in reviewing a proposal, those with a COI simply remove themselves from that review and return when it has been finished.

- Greenhouse / hydroponic production
  Keep in mind that these standards also include / affect organic sprouts, wheat grass & other tray-grown crops, and watercress.

- Mushroom production
  Keep in mind the wax plugs used in shitake production. We support the concept of using wood / sawdust grown under organic conditions - great idea!

- Peer Review Panel
  We support the language drafted by NOSB for the PRP.

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General Comment:

I see great improvement in process:

- looking to historical document
- friendliness with input from public throughout the meeting
- MINUTES! WOW!

Technical Corrections: 205.501 11 (v)
- This doesn't work as written in the Rule. Decision makers must review document. How else are they to decide??!

Transition:
Transitional labeling is not in the scope of OFPA. Such labels / reqs fit well into the venue of SOP's or state marketing programs. There is a vast difference between year one of transition and year 3 - to the consumer. Organic is organic just like pregnant is pregnant. Transition is simply the path, not the result.

Website: needs basic info for public concerning ~~should~~ will providing input & on agenda - what material be reviewed, who speakers will be ... ?

Outreach - Is this in the scope of OFPA? No. The education needed has to be provided on a more regional level. What is the need? As a certifier + educator, the needs are for how to meet certification requirements: rotation, record-keeping, fertility... One size does not fit all. Why not create a list of educational groups for growers? A calendar of conferences, list of publications, local contacts... would provide much better information than national contacts.

Is it appropriate for NOSB to send a communication or recommendation to SARE or others to develop a priority for the research into or creation of models that address compliance with organic requirements?

Aquatic work - excellent!