

UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD

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NATIONAL ORGANIC PROGRAM PRIORITIES  
LISTENING SESSION

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MONDAY  
MARCH 21, 2022

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The Listening Session convened via  
Videoconference, at 1:00 p.m. EDT, Jennifer  
Tucker, NOP Deputy Administrator, presiding.

PRESENT

- DR. JENNIFER TUCKER, Ph.D., Deputy  
Administrator, National Organic Program
- TAMMIE WILBURN, Regulatory Marketing Specialist
- MICHELLE ARSENAULT, Advisory Committee  
Specialist, Standards Division
- DAVID GLASGOW, Associate Deputy Administrator,  
National Organic Program
- ERIN HEALY, Director, Standards Division
- ANDREA HOLM, Materials Specialist

1 P-R-O-C-E-E-D-I-N-G-S

2 1:00 p.m.

3 DR. TUCKER: It is now the top of the  
4 hour. Welcome everyone. My name is Jennifer  
5 Tucker, I am with National Organic Program, I'm  
6 the Deputy Administrator. And thank you all for  
7 joining this organic regulatory priorities  
8 listening session. We are thrilled to have you  
9 all on with us for the next two hours here. We  
10 want to maximize the number of public speakers  
11 today. So I am going to keep our opening  
12 comments quite short.

13 First, I want to thank you all for  
14 being here for folks who are speaking, but also  
15 folks to have come to listen and share in the  
16 experience. So notes for attendees, the chat is  
17 enabled and so you can chat with each other or  
18 relay comments to us. Please do keep in mind  
19 that chats are not part of the public record.  
20 They are not considered a formal public comment.  
21 The closed captioning or subtitles is available  
22 in Zoom. If you want to click on live

1 transcript, we also have an official  
2 transcriptionist with us, who will be generating  
3 the official transcripts for the event.

4 We ask you, please do not use the  
5 raised hand feature. All registered comments  
6 will be called on in turn and we're going to be  
7 calling on people in the order you registered.  
8 So there is no magic to the list, we're simply  
9 calling on people in the order in which they  
10 signed up online. The Zoom support system is  
11 pretty good. You can go to support.zoom.us if  
12 you're having problems. We are recording the  
13 webinar. The transcript is going to be posted on  
14 the NOP website as soon as it is available.

15 Let's go ahead and do that next slide.  
16 So here are some specific instructions for our  
17 speakers today. We are asking you to please stay  
18 on mute until we call on you for comment. And so  
19 what I'll do is I'll call the person who is about  
20 to give a comment, and then, I will say the name  
21 of the next person who will be after that person,  
22 so you can get yourself all geared out to go off

1 the mute button when it's your turn. But please  
2 do stay on mute until you're called for comment.  
3 When you are called, you can unmute yourself and  
4 if you would like, you can turn on your camera,  
5 that's optional. The mic is at the bottom left  
6 of your screen or if you're on a phone, you can  
7 hit star 6. And we can help with that if needed.  
8 So if you're not quite sure what to do, go ahead  
9 and you can chat in and somebody will try and  
10 help you in the background, okay?

11 You will have three minutes to speak.  
12 And in fact, on the screen, there will be the  
13 spot light of the timer. And so right now it  
14 shows three minutes. Michelle's going to  
15 demonstrate that in just a minute. The timer  
16 will sound when your time is up. When you hear  
17 the beep, please finish your sentence. Now,  
18 we're not going to be asking follow up questions,  
19 after your comment. After your comment, we will  
20 move to the next person. And so once we've heard  
21 from all registered commenters, we will call on  
22 folks from the wait list. And again, the wait

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1 list is also in the order of sign up. So if  
2 you're on the wait list, we encourage you to stay  
3 on the line. It's a -- you'd -- we may be able  
4 to include you. We want to take as many comments  
5 as possible in the time we have. So before I  
6 finish the instructions, we're going to have  
7 Michelle demonstrate what the timer sounds like,  
8 and then I will make a couple of closing comments  
9 before we open the public comment period. Go,  
10 Michelle. Okay. So that's what the timer sounds  
11 like. Well done, Michelle.

12 MS. ARSENAULT: Everyone hear that  
13 okay?

14 DR. TUCKER: We're going to assume  
15 folks could hear that. If a couple people could  
16 just enter yes in the chat, if you heard it, yes,  
17 we can hear it. Great. Okay. Tammie, let's go  
18 ahead and share your slide again for the final  
19 links. So we do want to encourage folks to  
20 submit a written public comment. So this process  
21 of listening to each other is very important. It  
22 is equally important to have your comments in

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1 written form. So if you were not put on the list  
2 to talk today because it did fill up fairly  
3 quickly, we strongly encourage you to submit your  
4 written comments. And even if you do speak  
5 today, we invite you to submit those as well.  
6 And so the transcripts from the session will also  
7 be posted on the NOP website.

8 So I'm going to go ahead and share my  
9 screen and show you the web page that you want to  
10 go to. So we'll also put a copy of this link  
11 into the chat button. So this is the Federal  
12 Register notice that brought us all here together  
13 today. If you have not yet read the full notice,  
14 we encourage you to do so, it includes a lot of  
15 good supplementary information about what we  
16 believe the outstanding NOSB recommendations are  
17 to this point, what we've been working on, and  
18 where we see the different priorities that you  
19 are commenting on today. So today is very  
20 important part of that process. So you can  
21 comment right on this website by clicking  
22 comment, and there already about 28 comments on

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1 there. So we do encourage you to submit your  
2 public comment once you spoken or if you're not  
3 speaking today, please go ahead and submit a  
4 written comment. So I'm going to stop sharing.

5 And with that I want to thank the team  
6 that brought us here today. Specifically, Tammie  
7 Wilburn, in our Standards Division. Tammie, you  
8 want to come on camera and just wave hello to  
9 everybody. Many, many thanks to Tammie. Tammie  
10 did a beautiful job, helping write the notice and  
11 also putting all together all the logistics  
12 today, there she is. Yeah. Thank you, Tammie,  
13 very, very much. And then Michelle Arsenault who  
14 usually runs the public comment for NOSB meetings  
15 is offering her expertise today as well, with a  
16 timer and with the back room. We also have  
17 Andrea Holm and a whole other host of folks in  
18 the background that are helping to run this  
19 smoothly. So I think folks now in the NOP we  
20 applaud by waving two hands on the camera that  
21 comes from, I believe, American Sign Language, so  
22 many thanks to all of you for being here today.

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1 Thanks to the NOP team for making this such a  
2 smooth process.

3 And we are ready to begin the public  
4 comment process. So I am hoping to do this in  
5 the same style as the board chairs do it. So  
6 again, I will call on the person who will be  
7 speaking and then at the same time I'll say who  
8 is the next person on deck. So that person can  
9 be prepared to go. Andrea, thank you for copying  
10 in the link to the regulations.gov. So, for  
11 folks wanting to make a written comment, the link  
12 is now in the chat button. So, thank you for  
13 doing that.

14 So our first public commenter today  
15 will be Gwendolyn Wyard and Gwendolyn will be  
16 followed by Johanna Mirenda. So Gwendolyn, your  
17 three minutes begins now.

18 MS. WYARD: Okay. Right out of the  
19 gate. Can you hear me okay?

20 DR. TUCKER: Yes, we can. Thank you.

21 MS. WYARD: Okay. Wonderful. Well,  
22 good morning. My name is Gwendolyn Wyard and I'm



1 here providing comments on behalf of the Organic  
2 Trade Association, representing over 9,500  
3 members across the United States. The organic  
4 sector has come a long way over the past decades.  
5 We have grown from \$1 billion to 62 billion and  
6 we have a bright and positive story to tell, but  
7 really it could be so much better. In the grand  
8 scheme of things from an acreage in a market  
9 share perspective, we remain very small. A major  
10 factor of block to our growth is the styled state  
11 of organic standards development that is  
12 unfortunately fragmenting the market and stifling  
13 innovation and continuous improvement within the  
14 organic sector.

15 I want to thank USDA for sharing the  
16 status priorities and your current positions on  
17 NOSB recommendations. It's this kind of  
18 transparency and outreach to organic stakeholders  
19 that we want to commend and say more of this,  
20 please. We also want to recognize all of the  
21 great work USDA has done in implementing NOSB  
22 recommendations related to the National List.

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1 The issue we're dealing with, however, here today  
2 is that there's only been two updates to the  
3 organic practice standard since 2002, one of  
4 which was based on an NOSB recommendation, the  
5 pasture rule completed in 2010. We're looking at  
6 over 20 significant recommendations that have yet  
7 to make it over the finish line. So again, I say  
8 thank you.

9 The only way we're going to keep pace  
10 with consumers expectations, stay relevant and  
11 grow organic acres as if we evolved the organic  
12 standards. In fact, recent data we collected  
13 through an Edelman survey conducted in November  
14 of 2021 revealed that 89 percent of shoppers say  
15 that USDA should review and update the standards  
16 periodically and 87 expect that they'd be updated  
17 to reflect evolving understandings about soil,  
18 climate, and animal welfare.

19 So which recommendations are most  
20 important? Which one should be prioritized? We  
21 carried out a very extensive evaluation and  
22 feedback process with our membership to

1 understand the importance and the complexity of  
2 each recommendation. The top message that  
3 emerged is that while some recommendations are  
4 more urgent than others, they're all important.  
5 They were advanced to the secretary through a  
6 public process of consensus and they collectively  
7 address years of work and invested resources to  
8 advance organic farming as a sustainable form of  
9 agriculture, grow the supply and variety of  
10 domestically produced organic products and assure  
11 consumers that organic products meet a consistent  
12 standard.

13 The top priority that emerged is that  
14 USDA must prioritize standards development.  
15 That's the top priority. Our written comments  
16 describe in detail the process we used to inform  
17 our conclusions, and a resulting road map with a  
18 multi-stage action plan for ensuring that all  
19 NOSB recommendations are finalized over a  
20 reasonable time span. To address the question of  
21 urgency priority, the road map defines the  
22 starting point that we believe can lead to a

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1 quick win and make a big difference. So with  
2 that, I'll say thank you again and turn it over  
3 to my colleague, Johanna Mirenda to say more.  
4 Thank you.

5 DR. TUCKER: Thank you very much,  
6 Gwendolyn. Johanna Mirenda, you are up next, and  
7 then after that, Megan DeBates.

8 MS. MIRENDA: Great. Hi, everyone.  
9 I'm Jo Miranda, Farm Policy Director for the  
10 Organic Trade Association. As my colleague,  
11 Gwendolyn just mentioned, we have developed a  
12 proposed road map for how USDA can streamline  
13 implementation of the backlog of stalled organic  
14 standards. Our proposal includes a multi-state  
15 action plan to advance NOSB recommendations  
16 through an efficient and resourceful rulemaking  
17 process by grouping multiple recommendations  
18 together according to common and complimentary  
19 factors. And moving each group through the  
20 rulemaking process under single regulatory  
21 actions. We think that USDA can use this road  
22 map to balance industry needs while also working

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1 within the constraints of the federal rulemaking  
2 process. We look forward to submitting our  
3 proposal on the comment docket along with direct  
4 responses to NOP's prioritization questions. In  
5 the meantime, here's a few highlights.

6 First, complete rulemaking on  
7 strengthening organic enforcement, origin of  
8 livestock, and organic livestock and poultry  
9 standards. Full implementation is critical for  
10 closing major gaps in the regulations and  
11 advancing animal welfare. Then prioritize  
12 rulemaking to address inconsistent certification  
13 decisions in specific production categories that  
14 are currently being certified, but without clear  
15 or consistent standards. This includes  
16 apiculture, mushrooms, and pet food. We  
17 understand that draft proposed rules for each of  
18 these has already been completed by NOP, so dust  
19 them off and publish them as a proposed rule for  
20 comment without delay. Given the past work, NOP  
21 should be well positioned to move quickly and  
22 achieve a big and meaningful advancement of the

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1 standards, and include with this proposal, the  
2 one on strengthening organic seed use, we  
3 disagree with the NOP's assessment that this is  
4 not a priority. This is a simple yet critical  
5 revisions to the regulations and it cannot be  
6 enforced without rulemaking.

7 Next, NOP needs to begin the urgent,  
8 yet complex work of developing standards for  
9 greenhouse and container production to resolve  
10 known inconsistencies and widely divergent  
11 certification practices that have led to consumer  
12 confusion, certifier shopping, and proliferation  
13 of add-on labels. We disagree with NOP's  
14 premature conclusion, as stated in the Federal  
15 Register notice to not publish standards to  
16 prohibit hydroponics. NOP should publish an ANPR  
17 to begin the pre-rulemaking process for  
18 containers and greenhouse standards and let  
19 stakeholders weigh in.

20 NOP should also prioritize making  
21 efforts on personal care and aquaculture to  
22 create standards for these new scopes of

1 certification that can help assure confidence in  
2 organic label claims and further develop the best  
3 fixed supply of these ingredients and products.  
4 We're happy to see NOP recognize the importance  
5 of the NOP handbook as a -- and they're willing  
6 to keep it updated to support uniformed  
7 implementation of standards. Thank you. And my  
8 colleague Megan DeBates is up next to discuss the  
9 future of the public private partnership in  
10 standards development.

11 DR. TUCKER: Thank you very much, Jo.  
12 Megan DeBates, you are next, followed by Adam  
13 Seitz.

14 MS. DEBATES: Hi, I'm Megan DeBates,  
15 Vice President of Government Affairs for the  
16 Organic Trade Association. First off, I want to  
17 thank the National Organic Program for hosting  
18 this listening session and taking public comment  
19 on how to prioritize the backlog of stalled  
20 standards, as well as considering what the future  
21 should look like for a healthier public-private  
22 partnership that embodies continuous improvement.

1 We do not want to see history repeat itself. In  
2 order to prevent future backlogs like this from  
3 happening again, USD and NOP need to build  
4 capacity and structure for the ongoing  
5 development and implementation of standards. To  
6 continue the success of the organic program and  
7 keep up with the marketplace building capacity,  
8 appropriately allocating resources, and  
9 increasing communication of stakeholders must be  
10 top priority. This is going to require devoting  
11 additional resources and staffing exclusively to  
12 standards writing and development.

13 Congress has an important oversight  
14 role of the NOP and they've made it clear that  
15 the department is not taking standards  
16 development seriously enough and change is  
17 required to realign priorities. They have  
18 introduced legislation HR2918 to support this  
19 process by calling on NOP to take stakeholder  
20 feedback on the backlog and develop an action  
21 plan. We appreciate that USDA has taken steps to  
22 move forward on this.

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1           Transparency and accountability in the  
2           organic standards are critical for a truly  
3           participatory stakeholder engagement structure.  
4           We need to institutionalize better processes in  
5           the next Farm Bill. Future funding for the NOP  
6           should be contingent upon success and advancing  
7           standards and specific resources should be  
8           directed towards standards development. USDA  
9           needs to regularly update stakeholders and the  
10          unified agenda with the status, priorities,  
11          decision criteria, and current positions on NOSB  
12          recommendations.

13           We believe that the structure of the  
14          NOP can and should allow for prioritizing  
15          standards and market development, along with  
16          maintaining strong compliance and enforcement.  
17          We will ask congress to set a statutory  
18          requirement for USDA to review and update organic  
19          practice standards beyond just the National List.

20           Lastly, we support future and NOP  
21          priorities that will advance continuous  
22          improvement and environmental outcomes, protect

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1 organic integrity through strong oversight and  
2 enforcement, and allow the organic standards to  
3 keep pace with consumer and industry needs.  
4 Thank you for the opportunity to provide feedback  
5 and we look forward to working with the NOP to  
6 make these important changes.

7 DR. TUCKER: Okay, thank you, Megan.  
8 Our next speaker is Adam Seitz, followed by Lynn  
9 Coody. Adam?

10 MR. SEITZ: Good afternoon. My name  
11 is Adam Seitz, and I serve as a Senior Reviewer  
12 for Quality Assurance International, an NSF  
13 International company and leading provider of  
14 organic certification services. Thank you for  
15 holding this listening session and prioritizing  
16 the topic at hand. Approaching this issue is  
17 challenging from a certifier perspective, so I  
18 can only imagine how daunting it is to view the  
19 backlog of some big NOSB recommendations and  
20 chart a path forward for the NOP's perspective.  
21 Ultimately, though we tend to agree with the OTA  
22 and others that all the recommendations are a

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1 priority. QAI does not agree with all the  
2 content in each recommendation, but we do respect  
3 the process for their creation and support moving  
4 forward with rulemaking and most importantly, the  
5 opportunity for further public comment and  
6 consideration of those comments to shape  
7 resulting final rules. That said, it takes  
8 serious time and resources to implement  
9 regulatory changes from the certify a  
10 perspective.

11 I joined the organic community just as  
12 the pasture rule was being implemented and my  
13 first foray in the realm was certification  
14 entailed walking farmers through DMI worksheets,  
15 DMD calculations, updating field maps, and so on.  
16 This update was no small feat and didn't just  
17 take certifier efforts, but also certified  
18 operations to learn and implement the regulatory  
19 updates. Just changing the classification of an  
20 input from synthetic to agricultural or, say, a  
21 commercial availability clause to a non-synthetic  
22 input, can manifest surprising impacts for both

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1 certifiers and certified operations. Still, we  
2 are excitedly looking towards the future and  
3 updates that will come with SOE and other pending  
4 regulatory updates and welcome further rulemaking  
5 based on NOSB recommendations in question.  
6 Though the ideal and target we should aim for,  
7 given resources available in the here and now,  
8 perhaps it is unrealistic to advocate for moving  
9 all recommendations forward at this time.

10 With hesitancy, looking at the  
11 outstanding recommendations that certifiers are  
12 not individually capable of acting on without  
13 regulatory action, the following two NOSB  
14 recommendations jump out. Eliminate incentive to  
15 convert native ecosystems to organic production,  
16 organic aquaculture production standards.  
17 Certifiers can individually act on many of the  
18 other recommendations, but the lack of formal  
19 regulations based on them has led to  
20 inconsistencies in interpretation. As such, we'd  
21 like to see prioritization of greenhouse and  
22 container production system standards.

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1           We support the prioritization of  
2           adequate NOP staffing for standards development,  
3           but this should not come at the cost of other  
4           divisions where we see the inroads being made on  
5           the human capital front. Moving forward, we  
6           would like to see the Standards Division staff  
7           such that NOSB recommendations can be acted on  
8           more quickly so come 2042, the industry doesn't  
9           have to look back at a list of recommendations to  
10          figure out which are still relevant and important  
11          enough to advance.

12           In thinking about how to ensure  
13          consistent playing field, clear standards are  
14          greater than the program handbook, are greater  
15          than ACA best practices. Interchange ACA best  
16          practices and program handbook in that statement.  
17          I use the handbook all the time and QAI is an  
18          active participant in ACA working groups that  
19          generate highly valuable resources, but neither  
20          resources are binding nor do all certifiers have  
21          the resources to participate in ACA working  
22          groups to shape the groups best practices. If

1 our goal as an industry is consistency, clear  
2 standards and regulation come out on top. Thank  
3 you.

4 DR. TUCKER: All right. Thank you,  
5 Adam. The next speaker is Lynn Coody, followed  
6 by Adam Warthesen. Lynn?

7 MS. COODY: Hi, everyone. My name is  
8 Lynn Coody and I'm presenting comments for the  
9 Organic Produce Wholesalers Coalition, seven  
10 certified organic handlers that distribute fresh  
11 organic produce across the United States and  
12 internationally. OPWC is a long time active  
13 participant in the NOSB process, making us  
14 acutely aware of the many recommendations that  
15 the board has sent the NOP over the years. We  
16 are deeply concerned that important  
17 recommendations have languished, some for decade  
18 without further development or implementation.

19 We know from our experience in the  
20 organic trade that updating the regulations is  
21 crucially important to our ability to adapt and  
22 evolve to meet the ever-changing social,

1 environmental, and agricultural challenges before  
2 us. As my colleague Mike Dill will present, OPWC  
3 has identified five topics that we consider the  
4 highest priorities for the produce sector. We  
5 will be submitting written comments detailing our  
6 thoughts on these topics as well as on the  
7 structure of the NOP. In my comments today, I  
8 will focus on our number one priority, which is  
9 updating NOP Handbook.

10 OPWC notes that the NOP Handbook  
11 differs significantly in function from regulatory  
12 text. In contrast to regulations which serve as  
13 the foundation for enforcement and legal actions,  
14 the contents of the handbook are non-binding, and  
15 do not have the force of law. The handbook  
16 essentially represents topics that may or may not  
17 be implemented voluntarily by certifiers,  
18 certified operations, and the NOP itself. This  
19 important distinction is clearly articulated in  
20 the introduction to the handbook and in the  
21 document for this listening sessions. Clearly,  
22 guidance is not a sufficient basis for

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1 implementing OFPA. Regulations link the NOP's  
2 activities to the law by which they are  
3 authorized. However, many critically important  
4 topics, especially related to accreditation, are  
5 documented only in the handbook, not in  
6 regulation.

7 We assert that establishing a bright  
8 line between non-binding guidance and the  
9 mandatory regulations is a primary importance to  
10 the efficacy, transparency and fairness of the  
11 NOP's oversight of the organic trade. Therefore,  
12 as part of the NOP's review of the handbook  
13 anticipated as a result of the work on SOE  
14 proposed rule, OPWC urges a thorough review of  
15 all of the elements of the handbook to determine  
16 whether each is more appropriate for use as a  
17 non-binding guidance or whether it is actually  
18 serving as a de facto regulation and therefore  
19 must be prioritize for development of regulatory  
20 text.

21 In conclusion, OPWC urges NOP to  
22 compile the information arising from this



1 listening session quickly and to expedite action  
2 on organic stakeholders' highest priorities. As  
3 a way forward, we strongly encourage NOP to  
4 employ the conclusions of OTA's child project,  
5 which was developed in consultation with many  
6 sectors of the organic trade. Finally, we  
7 recognize the urgent need for more NOP staff  
8 devoted to standards development work. Thanks.

9 DR. TUCKER: All right. Thank you  
10 very much, Lynn. Next is Adam Warthesen followed  
11 by Annie Kustermann. Annie, if you are out  
12 there, we've not been able to find you. So if  
13 you could chat and just let us know you're there  
14 if you're there. Otherwise, Adam, you are up.

15 MR. WARTHESEN: Well, thank you for  
16 the opportunity to offer comments on the upcoming  
17 standards development of the National Organic  
18 Program. I'm Adam Warthesen, I'm the Director of  
19 Government and Industry Affairs for CROPP  
20 Cooperative. Our cooperative maintains a long  
21 standing position in the organic marketplace with  
22 nearly 1700 farmers in 34 states. The co-op is

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1 primarily focused in organic dairy, but also  
2 markets organic meat, eggs, produce, and feed  
3 stuffs for livestock. We are a cooperative of  
4 small to mid-size farms which focuses exclusively  
5 on the production, processing, and sales of  
6 certified organic products with branded bulk and  
7 ingredient sales, we strive to provide farmers a  
8 stable pay price and pride ourselves on extensive  
9 farmer engagement in governance of the  
10 cooperative.

11 We commend USDA for holding this  
12 listening session and seeking stakeholder input  
13 on standards development, NOP handbook updates,  
14 as well as the structure and resource allocation  
15 within the agency. While the twice yearly NOSB  
16 meetings do offer opportunities for stakeholders  
17 to address these topics that may have influenced  
18 the agency's work agenda, those meetings are  
19 often centered on materials review or other  
20 topics already predetermined, not necessary a  
21 dialogue in which we are at the forefront for the  
22 agency. Receiving feedback from agency personnel

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1 typically are just stakeholders coalesce on one  
2 or two priorities but to elevate them determine  
3 on a metric or some methodology for tripping  
4 forward is not commonly understood. Unless  
5 elicited by the agency, the alternative method to  
6 elevate attention to standards development for  
7 the industry has been congressional engagement,  
8 petition process, or sometimes litigation. All  
9 heavy lifts for invested parties. There must be  
10 a better way. And we believe this is part of  
11 that path and it reflects industry growth in the  
12 larger allocations of resources and staffing that  
13 is now at the National Organic Program.

14 While a brief update was provided in  
15 the Federal Register posting on February 7th, the  
16 top priorities to address in standard  
17 development, remain origin of livestock, organic  
18 livestock and poultry practice standard, and  
19 strengthening organic enforcement. The two  
20 livestock-focused rulemakings represent severe  
21 conditions of competitive harm among certified  
22 producers, and a risk to the overall sheared

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1 brand of certified organic consumers. While  
2 original livestock is final rulemaking stages of  
3 clearance out of OMB is perhaps the strongest  
4 example of how a failure to address practice  
5 standard has caused conditions where producers  
6 are exercising organic regulations that's  
7 distinctly different and non-compatible  
8 approaches.

9           These different approaches have led to  
10 economic disparities between producers and how  
11 they practice sourcing their cattle. Origin of  
12 livestock was first recommended for action by the  
13 NOSB nearly 19 years ago. The proposed rule was  
14 released in 2015, and now we've endured three  
15 common periods. We would urge there is no higher  
16 priority than for the origin of livestock, excuse  
17 me. So organic livestock and poultry practice,  
18 we also urge continued prioritization. Never  
19 before have we seen a rule with an effective date  
20 then upended, withdrawn, and then restarted as a  
21 proposal. Ensuring producers and certifiers have  
22 consistent understanding of animal care and

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1 organic systems, and addressing a market value of  
2 them a standard application must be accomplished.  
3 Along with strengthening organic enforcement,  
4 finishing standards is of the highest importance.  
5 We look forward to able to work with the NOP and  
6 hope this type of listening session becomes an  
7 annual occurrence.

8 DR. TUCKER: Thank you very much,  
9 Adam. Next up is Annie Kustermann. Annie, you  
10 may be on the phone. Annie, are you out there?  
11 Calling on Annie Kustermann. Following Annie, is  
12 Genevieve Albers. Who we also have not been able  
13 to find on the participant list. Annie  
14 Kustermann or Genevieve Albers, are you out  
15 there? Annie Kustermann or Genevieve Albers, are  
16 you out there? Okay. After Annie and Genevieve,  
17 I have Britt Lundgren up and then Ryan Koory. So  
18 Britt Lundgren and Ryan Koory, you're up next.  
19 Britt, before you start, last call for Annie  
20 Kustermann or Genevieve Albers. Annie Kustermann  
21 or Genevieve Albers. Okay. We are going to skip  
22 over Annie and Genevieve, we're going to go to

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1 Britt Lundgren, and then, we're going to go to  
2 Ryan Koory after that. So Britt, thanks for your  
3 patience, you're up.

4 MS. LUNDGREN: Thank you. My name is  
5 Britt Lundgren, I am the Senior Director of  
6 Sustainability at Stonyfield, an organic yogurt  
7 company based in New Hampshire. We are glad to  
8 see USDA taking action on continuous improvement.  
9 Inconsistent advancement of the regulations and  
10 extremely long lag times between recommendations  
11 from NOSB and implementation by NOP is negatively  
12 impacting consumer trust in the standard to the  
13 point where it is led to the emergence of  
14 alternative or add-on certifications that try and  
15 give consumers another way to address their  
16 concerns.

17 In the livestock sector, we have been  
18 particularly impacted by USDA's extreme delay in  
19 implementing final rules for origin of livestock  
20 and organic livestock and poultry practices.  
21 These rules are essential for closing loopholes  
22 that lead to inconsistencies and enforcement of

1 the standard and the delay in finalizing them has  
2 caused real economic harm to organic dairy  
3 producers and real damage to consumer trust in  
4 the organic seal and the agency needs to move  
5 quickly to finalize these rules.

6 NOP's decision not to prioritize  
7 rulemaking on eliminating the incentive to  
8 convert native ecosystems to organic production  
9 is inconsistent with USDA's overall focus on  
10 advancing climate-smart agriculture. The  
11 conversion of native ecosystems is a major source  
12 of greenhouse gas emissions from agriculture.  
13 The science-based target initiative sets  
14 guidelines for companies on how to account for  
15 emissions. And the current draft forest land and  
16 agriculture guidelines stipulate that companies  
17 must make and implement a zero deforestation  
18 commitment as part of compliance with the SBTi  
19 protocol. Zero deforestation commitments are  
20 challenging to implement for many reasons, but  
21 the traceability provided via organic  
22 certification could be valuable for overcoming

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1 these challenges if the organic standard were to  
2 also prohibit conversion of native ecosystems.

3 I should note here that Stonyfield did  
4 raise concerns in our comments on this topic when  
5 it was being discussed by NOSB. It is still  
6 important that NOP carefully evaluate the options  
7 for how native ecosystems are defined to ensure  
8 they do not create unnecessary limitations on  
9 farm's ability to manage their land. But I also  
10 want to acknowledge that the conversation on  
11 climate and greenhouse gas protocols has evolved  
12 since we submitted these first comments, and we  
13 encourage NOP to elevate the priority of this  
14 rulemaking in line with USDA's larger focus on  
15 climate-smart agriculture.

16 Last but not least, I would like to  
17 address agency resources for rulemaking. We  
18 appreciate the time and complexity involved in  
19 bringing new rules into being and we believe the  
20 agency needs to dedicate additional staffing and  
21 resources exclusively to standards writing and  
22 development in order to ensure it can keep up

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1 with the pace that is needed to facilitate  
2 continuous improvement of the organic standard.  
3 USDA should prioritize building the capacity of  
4 its team to address NOSB recommendations and  
5 rulemaking needs, so that it can address the  
6 backlog and keep pace with what is needed to  
7 advance organic agriculture into the future.  
8 Thank you for this opportunity to comment and we  
9 look forward to working with the agency as we  
10 begin to advance many of these long-awaited  
11 improvements.

12 DR. TUCKER: Thank you very much,  
13 Britt. Okay. I'm getting some feedback from the  
14 team that a number of folks on deck may not be  
15 here. So as a reminder, if you are here on the  
16 phone star six should unmute you. So if you are  
17 on mute and on the phone, star six should unmute  
18 you. I'm going to actually read four names and  
19 see if we have any of them here. Don't start  
20 talking until I actually say go because I do want  
21 to take folks in order. The challenge here is I  
22 want to give people an opportunity to speak if

1 they're online and just having technical  
2 difficulties, but I don't want to take too, too  
3 much time with folks who aren't here.

4 So the next four that will be in  
5 order, if they are here, are Ryan Koory. Ryan  
6 Koory, are you out there? After Ryan is Steve  
7 Patt. Steve Patt, you would be after Ryan, if  
8 Ryan speaks up. Brian Flood and Juan Oliva. So  
9 Ryan Koory, are you out there? Okay, if Ryan  
10 Koory is not out there, Ryan, can you hear us?  
11 Okay. I'm not hearing Ryan Koory. What about  
12 Steve Patt? Steve Patt, are you out there?  
13 Steve Patt, are you out there? Next is Brian  
14 Flood. Brian Flood, are you out there? So I've  
15 got Ryan Koory, Steve Patt, Brian Flood. All  
16 right. What about Juan Oliva? Juan Oliva?  
17 Okay, that's four people, Ryan, Steve, Brian, and  
18 Juan. I think we're going to move on through.  
19 So again, Ryan Koory, Steve Patt, Brian Flood, or  
20 Juan Oliva, are any of you out there? I think  
21 I'm going to move on to the next page. So the  
22 next page begins with -- I'm going to now read

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1 about three names and see if you folks are out  
2 there. If you're out there, you'll speak in this  
3 order. Shawnee Elmore. Shawnee Elmore, are you  
4 out there? Shawnee Elmore, are you out there?  
5 Following Shawnee would be Shane Bailey and then,  
6 Haide Munoz. Haide Munoz. Shawnee Elmore, Shane  
7 Bailey.

8 MS. ARSENAULT: Jenny, Shane typed in  
9 that he is here. I saw him on camera. He's  
10 right at the top of my screen.

11 DR. TUCKER: So let's -- last call for  
12 Shawnee Elmore before we go -- have Shane come  
13 on. Shawnee Elmore? Okay. We're going to move  
14 past Shawnee Elmore. So then, working our way  
15 through again, we have Shawnee Elmore then -- I'm  
16 sorry, Shawnee's not here. We're going to have  
17 Shane Bailey go. Hi, Shane. Good to see you.  
18 Got Shane. Then we'll have a Haide Munoz and  
19 then Mark Kastel. I do believe he's on. So,  
20 Shane, go ahead and thank you for your patience.

21 MR. BAILEY: Thank you very much for  
22 giving us the chance. My name is Shane Bailey.

1 I work for a contract manufacturer named  
2 Hearthside Food Solutions. I'm the  
3 Certifications Officer for -- in our Quality  
4 Systems Department. So as a co-manufacturer, we  
5 find ourselves in the gray area a lot and one of  
6 those fun things is that we find ourselves  
7 usually dual-certified due to customer  
8 requirements for their chosen certifiers or  
9 whatever. But as a co-manufacturer, we would  
10 just like to call out, that it would make, I  
11 think everybody's lives easier and prevent fraud  
12 in the food chain if everybody in the supply  
13 chain was required to be certified organic. So  
14 we see a lot of brokers and warehouses and stuff  
15 like that where they're not certified organic,  
16 but they do provide us organic ingredients. And  
17 so we have to go the extra step and having a  
18 certified uncertified handler affidavit for those  
19 suppliers. So we think that that would help  
20 everybody out along the select supply chain, and  
21 we'd also, it would help reduce the fraud. But  
22 then again, on the other side of the spectrum, we

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1 also think that brand owners should have to hold  
2 some sort of organic certification and not rely  
3 on the organic certification of their co-  
4 manufacturers. That way, it would just be pretty  
5 easy. We can probably drop some of our dual-  
6 certifications in some of our facilities, and we  
7 just think that that would help make everything  
8 obviously easier for me, on my end, but we'd also  
9 think it would help a lot to reduce fraud because  
10 we do see that. As we're normally in the gray  
11 area, we do see that as like a gray area or a gap  
12 in the certification process through -- in the  
13 NOP. And that's all I have.

14 DR. TUCKER: Okay, Shane. Thank you  
15 very much, and thank you for being here. More of  
16 a challenge than I thought it was going to be.  
17 So thank you. So next is Haide Munoz. Haide  
18 Munoz. Are you out there? We have Haide Munoz.  
19 Just another moment. Haide Munoz. Okay. And so  
20 I'm going to read the next three names just  
21 because we do seem to have some folks who are not  
22 here. So next up, once I finish going through

1 about three names here will be Mark Kastel.  
2 After Mark will be Jared Zystro, and then Tia  
3 Loftsgard. So next three up will be Mark Kastel,  
4 then Jared Zystro, and Leah -- Tia Loftsgard.  
5 And so Mark, good to see you. Take it away.

6 MR. KASTEL: Thank you very much. My  
7 name is Mark Kastel, I'm the Executive Director  
8 of OrganicEye. OrganicEye is a farm policy  
9 research group that acts as an organic industry  
10 watchdog. And as per the invitation request, the  
11 issues I will be discussing are the -- you're  
12 starting the clock, Michelle, I'm going to ask  
13 for your help because I was requested to do these  
14 issues first. I don't know if everybody else is  
15 or not, but I'm going to discuss the background  
16 behind today's forum, re-evaluating organic  
17 certification as we know it and the revolving  
18 door in Washington as it applies to organic  
19 governance.

20 So why do we need this listening  
21 session? Because family scale farmers who helped  
22 found the organic movement and lobbied congress

1 where regulatory oversight, placated the concerns  
2 of skeptics. Handing over some of what we deeply  
3 cared about to the federal government, by  
4 creating a buffer between corporate lobbyists to  
5 the rulemaking process the National Organic  
6 Standards Board. The intent of Congress has been  
7 disrespected and abused by every administration  
8 six ways from Sunday. It started when the USDA  
9 testified in Congress against OFPA, but it  
10 escalated during the Obama-Vilsack administration  
11 in consort between the NOSB Chair and the former  
12 NOP Director, resulting in stripping the power of  
13 the board to set their own agenda and work plan.  
14 Prior to that, community members could petition  
15 the board to take out important issues. That  
16 history, we hope to some miracle, will go back to  
17 the public-private partnership as it was  
18 envisioned.

19 Next, the current structure of the  
20 organic certification program is broken and if  
21 stakeholders deny that and go through the motions  
22 participating, we are all acting as enablers.

1 Here's the bottom line, private certifiers have a  
2 disincentive to do aggressive enforcement,  
3 financial disincentive. Inspectors are all too  
4 often good-intentioned young folks with no  
5 experience in production agriculture or forensic  
6 accounting, and they're going toe-to-toe with  
7 seasoned veterans who are going to have their  
8 lunch every day if their intent is to perpetrate  
9 fraud.

10 As one of the nation's leading  
11 industry watchdogs, I could tell you that my  
12 collaboration with the NOP, Justice Department,  
13 and FBI in helping bust the largest frauds in the  
14 history of the organic industry are almost always  
15 emanate from current or former employees or  
16 competitors ratting out the scofflaws, not  
17 inspections. We need to reinvent visions  
18 certification, concentrating on the conflicts of  
19 interest and shifting the annual inspections to  
20 being done by amateurs to comprehensive audits  
21 every five years by seasoned professionals with  
22 liberal, unannounced visits at audits and testing

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1 in-between, budget and revenue neutral. The IRS  
2 doesn't audit every taxpayer every year, but they  
3 sure as hell scare them -- all of us.

4 So finally, why should the organic  
5 industry be different than every other regulatory  
6 system in Washington? Because we said so. The  
7 optics are terrible. The former chief legal  
8 counsel and head lobbyist of the leading industry  
9 trade group as a political appointee and a  
10 controversial former NOP -- last sentence here,  
11 Michelle. And the former controversial NOP  
12 Director, going to work for the largest  
13 certifiers, he once was regulating himself. All  
14 this really undermines the vision that the  
15 framers of off the head intended. And thank you  
16 very much.

17 DR. TUCKER: Mark, thank you for your  
18 comments. Next up is Jared Zystro, followed by  
19 Tia Loftsgard and Mike Dill. So Jared, are you  
20 out there? Jared Zystro. Do we have Jared  
21 Zystro out there? Give Jared just another couple  
22 of seconds here. Tia Loftsgard and Mike Dill and

1 Abby Youngblood, you will be called next. So  
2 Jared Zystro. Jared Zystro, are you out there?  
3 You can go star six to come off mute if you're on  
4 the phone. Give Jared another second. Next up  
5 after that will be Tia Loftsgard, so Tia, if  
6 you're out there, you might want to get ready.  
7 Mike Dill and then Abby Youngblood. And we do a  
8 last call for Jared. Jared Zystro. Okay.  
9 Again, I want to try and be patient for folks  
10 having technical difficulties but I also don't  
11 want to spend a lot of time on folks who aren't  
12 here. So tough balance here.

13 Tia Loftsgard, are you out there? Do  
14 we have Tia? Apparently the backstage team is  
15 telling me, we do not see Tia. So Tia Loftsgard,  
16 Jared Zystro, either one of you out there? Try  
17 going star six if you're on the phone or chat in  
18 to let us know you're there. I do have a couple  
19 of folks saying that you don't hear the timer.  
20 Zoom isn't that great with simultaneous audio.  
21 So if the person is still speaking at the time  
22 the timer goes off, chances are we don't --

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1 you're not going to be able to hear it. That's  
2 why we do keep it on spot light, so people can  
3 see the clock running down in case you can't hear  
4 it. But that audio conflict can happen. I have  
5 not heard either from Jared or from Tia  
6 Loftsgard. So last call for both of you, Jared  
7 Zystro and Tia Loftsgard. Okay. In that case  
8 I'm going to read the next three names. You  
9 folks are ready? Next up will be Mike Dill,  
10 followed by Abby Youngblood, followed by Harriet  
11 Behar. So Mike Dill, good to see you.

12 MR. DILL: Hello, nice to see you too.  
13 And I would just put a plug out there for keeping  
14 the timer silent, it's actually nice not having  
15 to hear it every three minutes and it's easy to  
16 see. But anyways, my name is Mike Dill and I'm  
17 representing the Organic Produce Wholesalers  
18 Coalition. The OPWC is comprised of seven  
19 businesses that distribute fresh organic produce  
20 to customers across the United States. In 2020,  
21 OPWC members had a combined organic sales of  
22 nearly \$0.5 billion. We appreciate this

1 opportunity to provide written and oral comments  
2 on regulatory priorities for the organic program.

3 I will address the top five priorities  
4 for the handlers and growers in the fresh produce  
5 sector. Of utmost importance are the use of the  
6 NOP Handbook and the issues related to  
7 hydroponics, greenhouse, and container  
8 production. Additionally, the stalled standards  
9 around the increased use of organic seeds,  
10 eliminating incentives to convert native  
11 ecosystem to organic production and organic  
12 mushroom standards all impact the produce sector  
13 and need action.

14 OPWC was an early endorser of the  
15 OTA's continuous improvement and accountabilities  
16 in Organic Standards Act because we understand  
17 how important standards development is to the  
18 evolution and growth for the organic trade. Our  
19 first priority is the NOP Handbook, and you've  
20 already heard from my colleague, Lynn Coody about  
21 the many reasons why we need to establish a  
22 bright line between the mandatory provisions of

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1 the NOP regulations and the non-binding guidance,  
2 instruction, and policy memos in the handbook.

3 Our priority number two is the  
4 development of standards for hydroponics,  
5 greenhouse, and containers. OPWC asserts the  
6 topic should be re-framed so that production  
7 practices fall under the umbrella of controlled  
8 environment agriculture, referred to as CEA. To  
9 foster common understanding amongst stakeholders,  
10 OPWC suggests that to work begin with an expert  
11 panel to provide information about the scope and  
12 range of currently available CEA techniques and  
13 provide clear definitions for each. We would  
14 also like to see the expert panel charged with  
15 creating a diagram to show the similarities and  
16 differences of CEA techniques as we think this  
17 could be a tool to encourage clear communication  
18 and creative problem solving. Using this  
19 information, we propose development of distinct  
20 sets of specialty crop production standards such  
21 as nursery stock, mushrooms, and crop production  
22 that would fit under the overarching standards

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1 for CEA production.

2 Priority number three is increased use  
3 of organic seeds. OPWC would like to see the  
4 development of regulations that are currently  
5 achievable to foster positive trends in the  
6 availability of organic seeds and provide a clear  
7 basis for certifiers to monitor and enforce  
8 continuous improvement in growers use of organic  
9 seeds.

10 Number four, OPWC feels the comments  
11 from Wild Farm Alliance provide clear ideas that  
12 can be used as a basis for regulations related to  
13 eliminating incentives to convert native  
14 ecosystems to organic production.

15 Lastly, number 5, OPWC, urges  
16 reconsideration of the NOP's prior work on  
17 mushroom standards. In its early meetings, the  
18 NOSB acknowledged that there is significant  
19 differences in the methods used to produce  
20 mushrooms and those used for crops and fields.  
21 The NOSB's mushroom standards recommendation is  
22 now 21 years old and therefore ready for a beer.

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1 Thank you.

2 DR. TUCKER: Okay, Mike, thank you  
3 very much. I'm going to read a few names here so  
4 we can have folks ready to go. Abby Youngblood,  
5 you'll be next, but Abby bear with me while I  
6 read a couple more names so they're ready. Okay.  
7 So Abby is going to be next followed by Harriet  
8 Behar, and then Amalie Lipstreu. And then after  
9 that, Steve Etko. So we have Abby Youngblood  
10 followed by Harriet Behar. Sorry, it's Amalie,  
11 sorry. Apologies, Amalie Lipstreu and Steve  
12 Etko. So Abby Youngblood, go ahead.

13 MS. YOUNGBLOOD: Good afternoon. My  
14 name is Abby Youngblood and I'm the Executive  
15 Director at the National Organic Coalition or  
16 NOC. Thank you for this opportunity to give  
17 testimony. NOC is deeply concerned about USDA's  
18 failure to implement dozens of critically  
19 important National Organic Standards Board  
20 recommendations over the past two decades.  
21 Fundamental reforms must be put in place  
22 immediately to address problems that have led to

1 such a significant backlog. There are 71 topics  
2 that are part of the backlog, including many  
3 unresolved National List issues.

4 Among our membership, various issues  
5 take priority depending on stakeholder groups  
6 served and area of expertise. Many topics are  
7 related to practice standards. Practice  
8 standards are the heart of organic agriculture.  
9 They codify the systems-based approach that is so  
10 essential to the organic ethos. Practice  
11 standards recommendations are also a key  
12 mechanism for improving and strengthening the  
13 organic standards. For that reason, the very low  
14 implementation rate for practice standards has  
15 had a particularly detrimental impact on the  
16 integrity of the Organic Program. What I'd like  
17 to focus on in these comments are the process  
18 reforms that are needed.

19 First, we're asking that the National  
20 Organic Program adopt a process for communicating  
21 to the public its plans for implementing new NOSB  
22 recommendations within 60 days, including their



1 timeline for implementation.

2 Second, the National Organic Program  
3 should provide a written explanation with a clear  
4 justification to the NOSB and public stakeholders  
5 within 60 days for recommendations that they do  
6 not plan to implement.

7 Third, if the status of a  
8 recommendation changes due to a change in  
9 administration or for some other reason, the  
10 National Organic Program should communicate that  
11 change in status and the justification orally at  
12 public NOSB meetings and in writing in the form  
13 of a memo to the NOSB and public stakeholders.

14 Fourth, all comments submitted to the  
15 NOSB and a transcript of NOSB deliberations  
16 should automatically be included as part of the  
17 Federal Register docket for rulemaking on  
18 National List materials and practice standards.  
19 The National Organic Program should not base its  
20 decisions on a limited number of Federal Register  
21 comments rather the full breadth of evidence that  
22 was submitted during the NOSB's deliberations

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1 should also be considered as part of the  
2 rulemaking process.

3 In our written comments, we describe  
4 in greater detail the ways in which the process  
5 for implementing NOSB recommendations has broken  
6 down and 12 recommendations for reform. We  
7 believe these changes are essential if we want  
8 the organic program to survive and earn the trust  
9 of organic stakeholders. We hope to see evidence  
10 of change in the coming weeks and months, and we  
11 look forward to partnering with USDA to achieve  
12 meaningful reforms.

13 DR. TUCKER: Okay. Thank you very  
14 much, Abby. Next up will be Harriet Behar.  
15 Harriet, before you start, let me line up the  
16 next folks. Amalie Lipstreu will follow Harriet.  
17 And after Amalie is Steve Etko, and then, Ed  
18 McNamara. So Harriet, Amalie, Steve Etko, and Ed  
19 McNamara, are up next. And so, Harriet, good to  
20 see you, you're up.

21 MS. BEHAR: Hello. I had participated  
22 in the vast majority of the NOSB meetings, both

1 as a member of the public and as a NOSB member.  
2 And I can tell you that the organic community  
3 cares passionately about their regulation, the  
4 organic label, and they interact with the  
5 regulatory process with knowledgeable and  
6 detailed comments. The NOSB process builds trust  
7 in the organic label through those many meetings  
8 that it may come to, to bring together an  
9 agreement that has the support of the majority of  
10 the organic stakeholders.

11 The lack of transparency in the NOP  
12 process of prioritizing and implementing these  
13 proposed recommendations needs to be changed with  
14 a clear timeline of communication back to the  
15 organic community on the process and progress.  
16 If the recommendation cannot move forward due to  
17 poor language or lack of support in the AFPA or  
18 lack of will within the NOP and USDA for that  
19 specific subject. For example, the organic  
20 communities should be informed rather than things  
21 just going into a black hole. The NOSB should be  
22 allowed then to continue work on those issues if

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1 there needs to be new language or to overcome  
2 other obstacles, or the community could inform  
3 the NOP and the USDA that that issue is a  
4 priority to us as a community.

5 The NOP needs to honor the thousands  
6 of hours of work that stakeholders and NOSB  
7 members put into the drafting, discussion, and  
8 finalization of these recommendations by keeping  
9 us informed of progress with a clear system of  
10 updates on obstacles to implementation at least  
11 two to four times per year, so we can all work  
12 together. It's also disturbing that the NOP does  
13 -- is not following NOSB recommendations on both  
14 substance, petition reviews, and sunsets.  
15 Natamycin was voted not to be listed as an  
16 allowed natural. It's told to be put a  
17 prohibited oxytocin, sucrose octanoate esters,  
18 sodium nitrate, carrageenan, and unfortunately, I  
19 can go on and on.

20 The sunset process is no longer  
21 allowing for continuous improvement. The NOSB  
22 and the organic community will be less willing to

1 put new items on the National List if it seems  
2 once they are on, they can never come off. I  
3 would like to support the prioritization of  
4 native ecosystems agriculture, the 2010  
5 greenhouse standards, the excluded methods  
6 guidance recommendation, and the organic seed  
7 guidance from 2018. The prioritization should  
8 not only consider how many operations are  
9 affected, but in the case of agriculture and  
10 container production, having organically-labeled  
11 products on the shelves with very different  
12 standards negatively affects the integrity of the  
13 organic label. Destruction of native ecosystems  
14 to allow for quick entrance to the organic  
15 marketplace must be strongly discouraged.

16 DR. TUCKER: Harriet, thank you very  
17 much. Okay. Amalie Lipstreu. Amalie, there you  
18 are. Thank you for being here. Hold on for one  
19 second. I'm going to start calling more names.  
20 We are at the break point. We weren't entirely  
21 sure where the break point was going to be  
22 between signed up speakers and the wait list. So

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1 for folks who were on the wait list, you should  
2 have gotten an email saying you were on the wait  
3 list. We are in the next few speakers going to  
4 be transitioning over to that list. Given that,  
5 because folks on the wait list may not have  
6 joined us, I am going to be reading more names in  
7 terms of folks getting prepared and on deck. So  
8 we are going to be hitting that point where we're  
9 going to be switching over to the wait list from  
10 folks who were confirmed. And so the next few  
11 names are going to be Amalie Lipstreu. So  
12 Amalie, good to have you here then Steve Etca, if  
13 you're out there. Ed McNamara and then Grace  
14 Collins. So Amalie then Steve Etca, then Ed  
15 McNamara, and Grace Collins.

16 Before Amalie starts, we are also now  
17 at the top of the hour, which means we are  
18 exactly halfway through our time together here.  
19 I want to take this posture of mind folks, that  
20 even if you've given verbal comment today, we do  
21 invite you to submit your comments in writing as  
22 well. And if you are not able to speak or if you

1 joined us late and miss your spot, we do  
2 encourage you to submit public comments in  
3 writing. We are going to be reviewing those  
4 written comments very carefully and are as  
5 important as verbal comments. So again, if  
6 you've already spoken or you're about to speak,  
7 we encourage you to submit written comments.  
8 That deadline is March 30th. So Amalie, take it  
9 away. It's your turn.

10 MS. LIPSTREU: Thank you, Jenny. Good  
11 afternoon. I'm Amalie Lipstreu, Policy Director  
12 at the Ohio Ecological Food and Farm Association  
13 or OEFFA. For more than 40 years long before  
14 there was a National Organic Program, we've  
15 advanced organic agriculture. Our farmers have a  
16 deep state in the future of organic and are  
17 asking for a level playing field that allows them  
18 to not only survive, but thrive. OEFFA  
19 appreciates USDA's request for comment in the  
20 Federal Register, which emphasized that the  
21 agency is committed to transparency, sharing the  
22 status, priorities, decision criteria, and

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1 current positions on NOSB recommendations.

2 Contrary to those values an analysis  
3 done by Beyond Pesticides, clarified the problems  
4 with the NOP's delineation of closed on holding  
5 process recommendations. Whether the program  
6 chooses not to move forward with an NOSB  
7 recommendation or pauses its consideration, those  
8 decisions should be made with transparency and  
9 justification of decision-making. And for those  
10 that do move forward, a timeline for action in  
11 process recommendations can remain in this  
12 category for years. The process is right for  
13 reform and can ensure greater transparency and  
14 accountability to the public. The agency's in  
15 the position of needing to act on this 20 year  
16 backlog of recommendations and must require an  
17 action plan to prevent a recurrence of this  
18 situation.

19 OEFFA's priorities for action include  
20 origin of livestock, strengthening organic  
21 enforcement rules, and the organic livestock and  
22 poultry practices rule. These must all be



1 finalized. We also concur with our colleagues at  
2 NOC that these delays and implementation have  
3 done tremendous harm to the organic seal and the  
4 agency needs to act with urgency.

5 In addition to these issues, we ask  
6 that you prioritize production standards for  
7 terrestrial plants in containers and enclosures,  
8 excluded methods, strengthening organic seed  
9 guidance, mushroom standards, commercial  
10 availability and moving ACA guidance into rule of  
11 law, native ecosystems, as has been said by  
12 others, as a climate-smart agricultural  
13 production system. Organic must confirm any  
14 incentive to convert needed ecosystems, emergency  
15 use for insecticides, aquaculture, apiculture,  
16 and pet food.

17 Finally, to expedite this work, we  
18 suggest the agency consider combining several  
19 recommendations together and moving them forward  
20 in a smaller set of packages similar to the way  
21 that National List materials are handled. Thank  
22 you for this opportunity to comment.

1 DR. TUCKER: And thank you very much  
2 for your comments. So again, we are shifting  
3 over to the wait list now, and I'm getting  
4 feedback that a number of folks may not have  
5 joined us here. So the way we're going to do  
6 this is I am going to run through about five  
7 names at a time just to see if we can figure out  
8 who is on deck. If we get to the end of the  
9 list, we will go back to the beginning and I will  
10 call on folks who were not here at the time that  
11 they got called. We do have many more names to  
12 go, so I don't know if we'll get to that point,  
13 but just to be clear on the process. Okay. So  
14 next up was as Steve Etko, and then Ed McNamara,  
15 then Grace Collins, and then after that, Christie  
16 Badger, and then Ron Ballew. So we got Steve  
17 Etko, Ed McNamara, Grace Collins, Christie  
18 Badger, and Ron Ballew. So if you are on, go  
19 ahead and chat in just so we know that you're  
20 there and ready to go on deck. Steve Etko, are  
21 you out there? Okay. Christie, I see your chat.  
22 Steve Etko, are you out there? Ed McNamara, are

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1 you out there? Ed McNamara, are you out there?  
2 Again, Steve Etko, Ed McNamara. Grace Collins,  
3 Grace Collins, are you out there? Okay. I'm  
4 going to do a final call for Steve Etko, Ed  
5 McNamara, and Grace Collins. I'm going to move  
6 on to the next group here. So Christie Badger, I  
7 know you're here. We'll give you the mic in just  
8 a second. After Christie we'll be looking for  
9 Ron Ballew, Lee Frankel, and Terry Shistar. So  
10 again, Christie Badger followed by Ron Ballew,  
11 Lee Frankel, Terry Shistar. So Christie, why  
12 don't you go ahead?

13 MS. BADGER: Thank you. Good  
14 afternoon. I'm Christie Badger with the National  
15 Organic Coalition. NOC has urged USDA to  
16 finalize the origin of livestock and  
17 strengthening organic enforcement rules and to  
18 reinstate the organic livestock and poultry  
19 practices rule. We agree with other commenters  
20 that these three rules remained a top priority.  
21 The delays in implementing these regulations in a  
22 timely way have done tremendous harm to the

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1 organic seal. Although these three issues are  
2 priorities for NOC, all 71 issues that are  
3 currently part of the backlog are important to  
4 the integrity of the organic label and the NOP  
5 must develop a proactive plan to move all 71  
6 topics forward in a manner that honors the NOSB  
7 recommendations that had been made.

8 Indeed, some NOC member organizations  
9 may have placed a higher priority on other  
10 issues. The approach of asking the organic  
11 community to set priorities is for what -- for  
12 work, the NOP should have already completed  
13 unfairly pits different segments of the organic  
14 community against each other. We agree with  
15 previous commenters that all of its topics are  
16 important and must move forward.

17 We do want to highlight some topics to  
18 particular concern. These are areas where we  
19 think lack of action has had a significantly  
20 detrimental impact or on organic integrity.  
21 These are in no specific order.

22 Containers and hydroponic production.

1 Hydroponic systems do not meet the letter or the  
2 spirit of the Organic Foods Production Act and  
3 should not be allowed in organic production. The  
4 NOSB has made this determination as part of their  
5 2010 recommendation on containers in greenhouses.  
6 USDA's decision to allow hydroponics has caused  
7 great harm to organic integrity. USDA has  
8 created a Wild West situation in terms of  
9 hydroponic and container production with vastly  
10 different requirements from one certifier to the  
11 next. The situation is untenable and must be  
12 addressed.

13 Native ecosystems. Consumers expect  
14 the products that carry the organic seal are  
15 produced in a way that does not destroy  
16 ecosystems. AFPA and the organic regulations  
17 referenced the role of organic systems in  
18 protecting biodiversity and natural resources in  
19 multiple places. It is reasonable therefore for  
20 consumers to expect the organic regulations to  
21 ensure that organic farmers are not contributing  
22 to the destruction of native ecosystems.

1                   Strengthening the organic seed  
2 guidance. Organic seed is important to organic  
3 integrity and the success of organic farmers, and  
4 more clarity and consistent enforcement of the  
5 organic seed regulation is needed. We agree that  
6 the NOP should take action on this issue.

7                   Sodium nitrate and ammonia extracts.  
8 Thank you.

9                   DR. TUCKER: Christie, thank you very  
10 much. Okay. Continuing down the list, I don't  
11 think we have heard from Ron Ballew. So Ron  
12 Ballew, going to continue to move down the list.  
13 Ron, if you're out there, you can go star six to  
14 go off mute or chat in to let us know that you  
15 are there. So Ron, give Ron a minutes or so.  
16 After Ron, will be Lee Frankel and I do believe  
17 we have Lee and then Sherry -- sorry, Terry  
18 Shistar. I believe we have Terry as well. And  
19 then next up after that will be Patty Lovera, who  
20 I also believe that we have. Maybe not. So  
21 we've got Ron Ballew. Ron, kind of last call for  
22 you and then followed by Lee Frankel, then Terry

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1 Shistar, and then Patty Lovera. Patty, if you're  
2 out there. Okay. You know, I am now reading,  
3 you know, three or four or five names down at  
4 three minutes each. You know, if you know these  
5 folks, you hear their names and you want to reach  
6 out to them and tell them they've got like nine  
7 minutes to log on with us. The website does have  
8 the link. And we have told folks that there was  
9 a waiting list, so we understand that some folks  
10 who are on the waiting list chose not to come,  
11 but we are happy that there are folks on the  
12 waiting list that are here. So it does look like  
13 we're going to make good progress on our waiting  
14 list. And so if you know somebody who is wait  
15 listed, you want to reach out to them to see if  
16 they want to call in. We may be able to get to  
17 them. So last call for Ron Ballew before we move  
18 on here. No Ron? Then we're going to move on to  
19 Lee Frankel and then Terry Shistar and then Patty  
20 Lovera. So Lee, are you out there?

21 MR. FRANKEL: Yes, I'm here.

22 DR. TUCKER: All right. Go ahead,

1 Lee. The floor is yours.

2 MR. FRANKEL: Okay. Thank you for  
3 your time today. These are my personal  
4 recommendations and not on behalf of any specific  
5 client. You know, first off, I recognize that  
6 there's kind of, limited bandwidth within USDA,  
7 and within the Office of Management and Budget.  
8 You know, we don't have the ability to convert  
9 every recommendation into a specific regulation  
10 at the moment. But, you know, kind of, with that  
11 in mind, you know, I would encourage us to not  
12 waste time on items under active litigation like  
13 greenhouse and container standards. We wait  
14 until that appeals process has been exhausted.  
15 This is -- my next point is not about a specific  
16 rule that's an a pipeline, but just some rules  
17 that probably do need to be developed to help  
18 frame the issues for other products, kind of  
19 specifically, I feel like a lot of proposals are  
20 in appearing and unfairly restricting growers'  
21 ability to adapt to their site-specific  
22 conditions, particularly with some annotations

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1 involved. Looking at the high solubility  
2 nutrient debate currently under discussion at the  
3 NOSB, it seems like we don't have a good  
4 definition of what is even kind of, soil health.  
5 You know, is it something that's measured as the  
6 difference between the start of the crop rotation  
7 cycle to the end of it, or is it after each  
8 harvest? It just feels like the approach for a  
9 grower maybe the climate and region with markets  
10 for small grains and pulses is going to be very  
11 different from a grower that has multiple  
12 vegetable harvest. And a region under  
13 irrigation. because similarly, it's not on the  
14 list just yet, but it's something that does need  
15 to be addressed, you know, with the kind of  
16 three-year transition requirement being more  
17 clearly import that, you know, most of the  
18 commercial nursery providers or not following  
19 that, but certifiers are just using common sense  
20 and kind of looking the other way and seeing that  
21 there's no contamination of the product in  
22 certifying those operations anyway. But it feels

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1 like an area that does need some time and  
2 attention because can, kind of with aquaculture,  
3 that something that, you know, would help us get  
4 into the debate as, you know, how much of the  
5 interface with kind of a wild environment or off-  
6 farm interactions is too much, or how isolated do  
7 production facilities need to be from the outside  
8 environment. So I think just giving US producers  
9 on equal footing by having a aquaculture standard  
10 in the same way. Aquaculture would be great.  
11 And then, I just, you know, some additional work  
12 on what conservation of natural resources  
13 actually means. Kind of think why they use  
14 productivity of the entire crop cycle to conserve  
15 natural ecosystems and greenhouse emissions are  
16 very important that are being overlooked today.  
17 Thanks.

18 DR. TUCKER: Okay. Thank you, Lee.  
19 Okay. I'm going to read a few more names here.  
20 I'm going to see if we can get some folks on deck  
21 here, so I do you believe we have Terry Shistar.  
22 So, Terry, get ready to go here, but I'm going to

1 run through some names just in case they have  
2 joined us. After Terry Shistar, we'll have Patty  
3 Lovera, and then Rima Patel, Nicole Dehne, and  
4 Courtney Bogaert. So Terry and then Patty  
5 Lovera, Rima Patel, Nicole Dehne, and Courtney  
6 Bogaert. So those are the next five up here.  
7 So, Terry, if you are out there and ready to go,  
8 please begin.

9 MS. SHISTAR: Hi. I'm here. This is  
10 -- I'm Terry Shistar and I'm on the board of  
11 directors of Beyond Pesticides. And I'm not  
12 going to put the video on because I've got  
13 bandwidth problems here. The Organic Foods  
14 Production Act established NOSB to advise the  
15 Secretary of Agriculture on the implementation of  
16 the act with special attention to the National  
17 List of proven prohibited substances. According  
18 to the NOSB's -- the NOP's recommendations  
19 library, NOP has categorized NOSB recommendations  
20 as complete, closed, on hold, or in process. We  
21 will submit a report that analyzes these outcomes  
22 and their impact on organic production.

1           The category closed is used when NOP  
2 chooses not to follow NOSB recommendations. It  
3 is accompanied by a lack of transparency and  
4 often a failure to justify actions. Decisions  
5 concerning the National List are the undisputed  
6 purview of the NOSB and certainly should not be  
7 closed unilaterally by NOP. If on hold means as  
8 we are told, action being taken by USDA or  
9 another agency work should hold pending action,  
10 then, we should ask what action's pending for  
11 each of these recommendations. In no case,  
12 except ammonia extracts, can we discern a pending  
13 action that it should affect the implementation  
14 of the recommendation.

15           What these recommendations do have in  
16 common is a reflection of organic values. Values  
17 that may not be held by the conventional  
18 agricultural stakeholders of USDA. Such values  
19 reflect the higher standards to which the organic  
20 community expects organic production and  
21 processing to be held. It seems to be difficult  
22 for USDA to prioritize such issues. The category

1 in process includes recommendations that vary in  
2 the amount of action that's been taken. In our  
3 report, we've further categorize the action as  
4 action pending, proposed rule, other, or nothing.  
5 Although USDA bureaucratic process practices may  
6 count pending actions as actions, we do not.  
7 That's when NOP says the inertation change for --  
8 lists four inerts is in process because an ANPR  
9 is pending. We will count it as an action only  
10 when was in actual proposed rule.

11 NOP's failure to complete NOSB  
12 recommendations threatens organic integrity. And  
13 now, NOP has come to the organic community with a  
14 request for input concerning the priorities to be  
15 assigned to recommendations it has failed to  
16 complete. This is totally unacceptable. The  
17 organic community has spoken on these issues, but  
18 the NOP has not done its job. It's improper,  
19 indeed, outrageous for NOP to now pit segments of  
20 the organic community against one another. We  
21 should not have a need to decide relative  
22 priorities for strengthening organic, seeking

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1 guidance in correcting listings for inert  
2 ingredients, for example. NOP must do its job  
3 with no excuses. It must ensure that OMB  
4 understands the structure of the organic program,  
5 including why the National List changes as  
6 materials. Higher priority to completing NOSB  
7 recommendation. It is NOSB's responsibility to  
8 just get it done. Thank you.

9 DR. TUCKER: Okay. Thank you, Terry.  
10 And so okay. Standby for just a second. I'm  
11 going to call through a couple of other names  
12 here. So I think we've established that Patty  
13 Lovera is not here. We're going to have Rima  
14 Patel followed by Nicole Dehne and then Courtney  
15 Bogaert and then Kate Mendenhall. Okay. So  
16 we've got -- Patty Lovera is not here, so we're  
17 going to go Rima Patel, if you're out there,  
18 Nicole Dehne, then Courtney Bogaert, and then  
19 Kate Mendenhall. So that's the next few up. So  
20 let's start first with Rima, R-I-M-A. Rima, can  
21 you hear me? Rima? Rima Patel? Sounds like you  
22 may not be there. Okay. Nicole Dehne, are you

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1 out there? Nicole? Okay. I'm going to read a  
2 few more names here. Courtney Bogaert, are you  
3 out there? After Courtney, we'll, have Kate  
4 Mendenhall. Kate, I do believe you are out  
5 there. Followed by Michael Sligh and then Alice  
6 Runde. Okay. So Courtney Bogaert, are you  
7 there? Okay. I do appreciate some comments in  
8 the chat box we're waiting for a couple of names.  
9 Yeah, we haven't done one of these before, so I  
10 think we're all learning in real time. This is  
11 the first time we've used this format. And we do  
12 still have a number of names. So I think we're  
13 going to continue to go through the process here.  
14 I think one of the lessons learned here is if  
15 you're on the wait list, please do plan to  
16 attend. It's really hard to be -- we want to be  
17 clear with folks as to what their status is, but  
18 we can't predict where the no-shows are going to  
19 be in the first part of the list. So I think we  
20 will all continue to work through these processes  
21 and we're certainly learning a lot through the  
22 process. In the meantime, we still have a number

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1 of folks to speak. So it sounds like we do not  
2 have Rima Patel, Nicole Dehne, or Courtney  
3 Bogaert. Kate Mendenhall, I do believe you are  
4 out there. Kate?

5 MS. MENDENHALL: Hi, thank you so much  
6 for the opportunity. My name is Kate Mendenhall  
7 and I'm the Executive Director for the Organic  
8 Farmers Association. We were told we were on the  
9 waiting list, so I don't have comments prepared,  
10 but I do want to take the opportunity to just  
11 note on a few priorities from Organic Farmers  
12 Association, and then we will be submitting more  
13 complete written comments.

14 So I wanted to reiterate the priority  
15 from Organic Farmers Association for finalizing  
16 origin of livestock, organic livestock poultry  
17 standards rule, and strengthening inorganic  
18 enforcement. Those have been recurring  
19 priorities for organic farmers nationwide since  
20 we first started serving them in 2018. So  
21 finalizing those this year is a high priority.

22 I also wanted to take the opportunity



1 to point out that while we survey organic farmers  
2 annually, the last two years prohibiting the  
3 certification of hydroponics has continued to be  
4 in the top three. And so continuing to certify  
5 hydroponics without standards is very frustrating  
6 to organic farmers nationwide. So I would say  
7 that as a priority for the NOSB to discuss and  
8 review the greenhouse standards that we currently  
9 have and identifying the inconsistencies that  
10 have arisen in the past more than a decade since  
11 those were written is really important. There's  
12 a lot of certification inconsistency there and  
13 that needs to be remedied.

14 Likewise, I think, you know, all of  
15 these standards are important to organic farmers  
16 is the organic label. Having consistent, uniform  
17 standards is important for the whole program, and  
18 so moving all of the NOSB recommendations through  
19 the process is a priority for us as well. We  
20 support the process. We really value the  
21 volunteer work that NOSB members put in, and we  
22 want those recommendations to me moving forward.

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1 So we would support all of them but I understand  
2 you have to start somewhere.

3 I also would like to comment that in  
4 our strengthening inorganic enforcement comments,  
5 we pulled out a lot of need for more public  
6 comment on what the grower groups would look like  
7 and I anticipate those will come forward in the  
8 next rule. But I just want to pull forward that  
9 we find that very important for marginal  
10 communities within the United States, being able  
11 to use that model to certify and we think that  
12 it's really important to be able to make that  
13 accessible, especially to indigenous and small  
14 farmers, particularly farmers of color. It could  
15 really help diversify the organic movement and  
16 want to bring that forward as a priority. And  
17 like I said, we will be submitting more detailed  
18 comments written, but thank you for the  
19 opportunity to jump in.

20 DR. TUCKER: Okay. Kate, thank you  
21 very much. And I will echo something that Kate  
22 just said. The written comments are really

1 important. And so for folks who are sharing that  
2 you had people who are on the wait list and chose  
3 not to come because they weren't sure if they  
4 would get called off the wait list. Please do  
5 encourage them to submit written comments. The  
6 written comments are as important as the verbal  
7 comments and will be open until March 30th. And  
8 so again, encouraging folks to get in written  
9 comments by March 30th. Those written comments  
10 are really important. And so if you gave verbal  
11 comments, we also encourage you to submit those  
12 as written comment. So we do appreciate the  
13 great interest in this topic, which is why we  
14 wanted to have both oral and verbal opportunities  
15 here.

16 We still have a number of folks on the  
17 list that we will run through. So I'm going to  
18 run through a few more names here. It don't  
19 think we ended up hearing from Nicole Dehne or  
20 Courtney Bogaert. And so we're going to move on  
21 to Michael Sligh. And then Alice Runde and that  
22 Walid El Singaby and Emily Velasquez. So let me

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1 read those names if you are here, please go ahead  
2 and chat in if you are here. Michael Sligh,  
3 Allison Runde, Walid El Singaby, and Emily  
4 Velasquez. Let's see, and folks in the back are  
5 keeping me updated on where we are. It sounds  
6 like of that group, we may have Emily Velasquez.  
7 I also understand that Jared, who was called on  
8 earlier may be here now. So Jared, we'll pick  
9 you up at the end of the list. We will go back  
10 and do a pass-through for folks who were called  
11 on earlier today, I will do another run through  
12 the list and we'll get as far as we can. In the  
13 meantime, Emily Velazquez, why don't you go  
14 ahead? Okay. Emily just shouted in, no prepared  
15 comments, just listening in. Emily, you do have  
16 the floor. Do you want to say anything? Going,  
17 going, gone. Michael, Alice, Walid, Emily.

18 Next group of folks are Carol Olson,  
19 Julia Barton, Edward Maltby, and Darrell  
20 Huddleston. So if any of you folks are on, Emily  
21 said she'll submit written comments, which is  
22 great. Thank you very much. So again, the next

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1 batches, folks, if you could chat in, if you are  
2 here, Carol Olson, Julia Barton, Edward Maltby,  
3 and Darrell Huddleston. Are any of you on?  
4 Okay. Again, if you know these folks, they -- we  
5 did let them know they were on the wait-list if  
6 they weren't able to join, do encourage them to  
7 submit written comments. The written comments  
8 are as important as the verbal comments. So  
9 let's see, we've got again, Carol Olson, are you  
10 out there? Julia Barton, Edward Maltby, or  
11 Darrell Huddleston. Okay. I'm going to keep  
12 going here, Agustinus Budiharto? Agustinus  
13 Budiharto, Luis De Vore or Luis De Vore,  
14 Sebastian Belle, or Joan Mendez? Sebastian, it  
15 looks like we have you. So let me run through  
16 the list just to make sure before I come back to  
17 you, Sebastian. So Carol Olson, Julia Barton,  
18 Edward Maltby, Darrell Huddleston. Agustinus  
19 Budiharto, and Luis De Vore, any of you here?  
20 I'm going to call then on Sebastian Belle, who is  
21 here. Sebastian, thank you for being here. The  
22 floor is yours.

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1                   MR. BELLE: Thank you, Jennifer. My  
2 name is Sebastian Belle, I'm the Executive  
3 Director of the Maine Aquaculture Association and  
4 the President of the National Aquaculture  
5 Association. Our members grow finfish,  
6 shellfish, and seaweed both in marine and  
7 freshwater environments. I was also a member of  
8 the NOSB Aquaculture Task Force and I personally  
9 have been advocating for organic standards for  
10 aquaculture for over 25 years. That task force  
11 came forward with recommendations after a four-  
12 year period. Task force was comprised of  
13 farmers, academics, and representatives from the  
14 organic community and the environmental  
15 community. We consulted with over 100 experts  
16 over that four-year period and sent a group of  
17 recommendations to the NOSB, which they reviewed.  
18 And then forwarded on after some modifications to  
19 the NOP.

20                   Currently in the US, roughly two to  
21 five percent, depending on whose numbers you  
22 believe of the seafood market is certified as

1 organic. All of that comes from other countries  
2 and is certified under other kinds of organic  
3 certification programs. Our farmers, many of  
4 whom would qualify under these certification  
5 programs in other countries, have to compete  
6 against this product in the marketplace. And  
7 it's very difficult for them to do that because  
8 they don't have a US set of standards to put them  
9 on a level playing field, or actually to raise  
10 the bar. Many of the overseas organic standards  
11 that are being used in seafood come nowhere near  
12 the recommendations that were put forward to the  
13 National Organic Program. I will say that I  
14 recognize that the NOP is grossly understaffed  
15 and under resourced, and we will and have been  
16 advocating for more staff and resources in  
17 Congress for the department. And I also would  
18 like to thank the Organic Trade Association for  
19 their support for advocating for organic  
20 standards to be put forward. I will not take any  
21 more of your time, you've had a long day, but  
22 thank you very much. We will be submitting

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1 written comments.

2 DR. TUCKER: Okay. Sebastian, thank  
3 you very much. Appreciate your being here. So  
4 did we have Joan Mendez? Is Joan here? Joan  
5 Mendez. Okay. Next step of the process that we  
6 are going to start back up at the beginning. And  
7 so unless we got a specific note saying that  
8 somebody was not going to be here, we're going to  
9 run through the list of folks. So these are all  
10 names you all heard before. And so some of them  
11 may have joined us late, but we're going to run  
12 through that list once more. We do appreciate  
13 the feedback in the chat box on process, the  
14 first time we've done this. So we did not  
15 realize how many folks were not going to be able  
16 to join us and so we appreciate that there were  
17 some folks on the wait list that joined anywhere  
18 and we're glad that you had your voices heard.  
19 And I do want to encourage everyone to submit  
20 written comments by March 30th, so we still have  
21 more than a week for folks to submit written  
22 comments and those are in fact, very, very, very

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1 important to the program.

2 So I'm going to read through some  
3 names here. And so if you are here, please go  
4 ahead and chat or I will give you about a few  
5 seconds to jump in. So starting back at the  
6 beginning of the list, we have Annie Kustermann.  
7 Did Annie join us? If you are here, go ahead and  
8 chat in or kind of speak up. So Annie  
9 Kustermann? And then we also had Genevieve  
10 Albers? So Genevieve Albers. Annie Kustermann,  
11 Genevieve Albers. And then there was Ryan Koory.  
12 So Ryan Koory, Genevieve Albers, or Annie  
13 Kustermann? Next set was Steve Patt. Steve  
14 Patt, Brian Flood, Juan Oliva. Again, I've got  
15 Annie Kustermann, Genevieve Albers, Ryan Koory,  
16 Steve Patt, Brian Flood, Juan Oliva. If any of  
17 you are here, please go ahead and chat in or at  
18 this point, speak up. And then we had, moving  
19 on. Shawnee Elmore. Shawnee Elmore. Haide  
20 Munoz, Haide Munoz. And we had Jared Zystro. So  
21 Jared, it sounds like we might have you so one  
22 final chance for Shawnee Elmore and Haide Munoz.

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1 Jared, I'm going to give you the floor in just a  
2 second. After that, it would be Tia Loftsgard,  
3 if Tia he had joined us, and Steve Etko, if Steve  
4 joined us. Hey Jared, I think you are up. Go.

5 MR. ZYSTRO: Thank you. Hello,  
6 everyone. My name is Jared Zystro. I'm the  
7 Research and Education Assistant Director for  
8 Organic Seed Alliance. We're a mission-driven  
9 organization that works nationally to ensure  
10 organic farmers have the seed they need to be  
11 successful. Thank you for this opportunity to  
12 come on the NOP's rulemaking priorities. My  
13 comments today will focus on policy priorities as  
14 they pertain to organic seed and planting stock  
15 regulation. Last week, Organic Seed Alliance was  
16 proud to release our third update to organic seed  
17 -- state of organic seed project.

18 With our newest report, we now have 15  
19 years of organic seed data to inform our  
20 understanding of organic seed sourcing.  
21 Unfortunately, our newest findings show new known  
22 meaningful improvement in organic producers using

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1 more organic seed. We know that certified  
2 organic producers are required to source organic  
3 seed when commercially available. But our data  
4 shows that most organic grower still plant  
5 conventional seed for at least part if not all of  
6 their operations. Specifically, we found that  
7 organic seed usage in field crops, forage crops,  
8 and cover crops remain stagnant. The only bright  
9 spot we documented is vegetable producers can  
10 grew for fewer than 50 acres. These small  
11 acreage producers report using more organic seed.  
12 But much like we saw five years ago, the largest  
13 vegetable producers still used relatively little  
14 organic seed, and this has a big impact on  
15 overall acres planted to organic seed. We also  
16 saw an increase in organic producers reporting a  
17 process or buyer requirement as a factor in not  
18 sourcing organic seed. More than 30 percent of  
19 organic farmers responding to our survey  
20 identified this as a challenge in sourcing  
21 organic seed and some certifiers also report that  
22 these buyer requirements are serving as a barrier

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1 to more organic seed sourcing.

2 We appreciate that the NOP completed  
3 a training on organic seed sourcing last year,  
4 and that is now available in the Organic  
5 Integrity Learning Center. However, we don't  
6 believe these steps are sufficient for ensuring  
7 continuous improvement in organic seed sourcing,  
8 and we respectfully disagree with the NOP's  
9 decision not to prioritize the NOSB's  
10 recommendation towards update at seed regulation.  
11 The most recent data that I cited underscores  
12 urgency and encouraging more organic seed  
13 sourcing from a regulatory perspective. In fact,  
14 our data shows that fewer organic producers  
15 report their certifiers encouraging they take  
16 extra measures to source more organic seed. In  
17 2011, 60 percent of organic farmers responding to  
18 our national survey reported that certifiers  
19 requested that they take extra measures to source  
20 more organic seed. While in 2022 only 35 percent  
21 of organic farmers reported receiving such  
22 requests from certifiers. Our most recent

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1 findings also show that nearly 70 percent of  
2 accredited certifying agency support stronger  
3 regulations that aim to strengthen enforcement of  
4 the organic seed requirement.

5 We believe that the organic seed  
6 sector is at a critical juncture. If we are to  
7 ensure strong integrity of the organic label,  
8 this integrity must begin with ensuring that a  
9 fundamental input seed is certified organic. We  
10 at Organic Seed Alliance are concerned about the  
11 trends published in our most recent state of  
12 organic seed report and strongly encouraged the  
13 NOP to make the NOSB's recommendations regarding  
14 the seed and planting stock regulation a top  
15 priority. Thank you.

16 DR. TUCKER: Okay. Jared, thank you  
17 very much for your comment. Okay. I'm going to  
18 run through a few names here. We've gotten some  
19 independent confirmation of folks who are not  
20 here today, so I'm not going to rename folks who  
21 we've gotten independent confirmation or not  
22 attending, but just in case we had some folks

1 join us. Tia Loftsgard. Tia, are you out there?  
2 And we've got Ed McNamara or Grace Collins or Ron  
3 Ballew. I'm going in order. I do know a couple  
4 of later folks are here, but I do want to respect  
5 the list here. So Tia Loftsgard, Ed McNamara,  
6 Grace Collins, or Ron Ballew. Do we have any of  
7 those folks on? Let me go right back to the  
8 first list just to make sure. Annie Kustermann,  
9 Genevieve Albers, Ryan Koory, Steve Pratt -- I'm  
10 sorry, Steve Patt, Brian Flood, and Juan Oliva.  
11 Okay. Going to keep going through the list here.  
12 Rima Patel, Nicole Dehne, Courtney Bogaert,  
13 Michael Sligh, Walid El Singaby, Carol Olson.  
14 Any of those folks here? Rima Patel, Nicole  
15 Dehne, Courtney Bogaert, Michael Sligh, Walid El  
16 Singaby, Carol Olson. Okay. I do believe that  
17 Julia Barton is on, so Julia, are you with us?  
18 You're next.

19 MS. BARTON: Yes, ma'am.

20 DR. TUCKER: Okay. Go, Julia.

21 MS. BARTON: Hi, and thank you for  
22 holding this session. I am Julia Barton, I work

1 as a with Sustainable Agriculture Educator for  
2 the Ohio Ecological Food and Farm Association,  
3 and I engage primarily with transitioning  
4 producers and also in the organic policy arena,  
5 particularly with the NOSB process. We think the  
6 NOSB process is really important somewhat sacred  
7 to the organic community. And we think that also  
8 the autonomy of the National Organic Standards  
9 Board is particularly important. Because the  
10 recommendations that come from the NOSB are  
11 forwarded to the NOP into the secretary to then  
12 sort of trickle their way back to the organic  
13 community and are of products of the work of so  
14 many people and so much time, we think that all  
15 of the NOSB recommendations are of equal  
16 importance.

17 That said, we understand there's a  
18 backlog and we appreciate the opportunity to  
19 comment on those pieces that might rise to the  
20 top, given that something has to come first. My  
21 colleague, Amalie Lipstreu commented really  
22 clearly and concisely about those items at the

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1 top of our list. So those include SOE, origin of  
2 livestock, OLPP, and we know the program's been  
3 working hard on SOE and origin of livestock for  
4 some time. We're really eager to see those  
5 various pieces move forward.

6 We also are really concerned about the  
7 pieces that are inconsistent. I guess, causing  
8 inconsistencies amongst certifiers, chief among  
9 them, we would put greenhouse and container  
10 production because we don't certify hydroponics  
11 operations that OFPA there's no clear applicable  
12 standards for us to use to do so, and we know  
13 that there's a lot of, kind of certifier jumping  
14 and hopping and shopping that goes on for folks  
15 to find folks that are willing to certify those  
16 systems.

17 Other pieces that are leading to  
18 inconsistency include the mushroom standards,  
19 which have been written for quite some time in a  
20 very clear manner from my perspective and which  
21 we utilize in the form of guidance, essentially,  
22 and, you know, with the lack of clear applicable

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1 standards for mushrooms. Similarly, the  
2 strengthening organic seed use recommendation is  
3 another one that I think is interpreted  
4 differently among certifiers in which would  
5 really benefit the community if you were able to  
6 move forward quickly.

7 I didn't prepare any formal comments  
8 today because I didn't think that I'd had the  
9 opportunity to speak, so I'll stop there and just  
10 thank you again for your time and for your  
11 attention to these recommendations which are, as  
12 you know, kind of the embodiment of a lot of  
13 people's energy and time. Thank you.

14 DR. TUCKER: Okay. So thank you very,  
15 very much, Julia. I'm going to give a last  
16 chance to the final folks on the list, but that  
17 was the last speaker that we are aware of being  
18 here. And so let's see, we've got Carol Olson,  
19 Edward Maltby, Darrell Huddleston, Agustinus  
20 Budiharto, Luis De Vore, and Joan Mendez. Okay.  
21 I think we have a -- so just to review the  
22 process here, we did go through all of the

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1 speakers that had confirmed. We did do the math  
2 just to reflect on process a little bit because  
3 we do have a few minutes, so I want to reflect on  
4 process a little bit. We've gotten some good  
5 chats in on this, and this will certainly be kind  
6 of a learning experience for us, and I think for  
7 the community out there. So we had done the math  
8 on how many folks we thought we would be able to  
9 take.

10 So we wanted to be open with folks in  
11 advance as to whether we thought they would be a  
12 confirmed speaker or on the wait list. And so we  
13 did have more folks not to join us from the  
14 confirmed list than we were expecting. And so I  
15 think that was a surprise probably to all of us.  
16 So in the future, if you are signed up and then  
17 aren't going to come the earlier you can let us  
18 know, the better that'll help us plan out. And  
19 then we were actually able to make it through the  
20 entire wait list. And so another good lesson for  
21 us and for folks out in the community. If you're  
22 on the wait list, do, please, try to block the

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1 time. So again, we learned a lot through this  
2 process and the key point here is the written  
3 comments are still going to be open until March  
4 30th. So March 30th for written comments and we  
5 do have a team that's reviewing comments as they  
6 come in that will be enormously helpful in  
7 framing next steps. So we've been taking notes  
8 and there will be transcripts from this session.  
9 We are planning on providing a read out back of  
10 about what we learned and what's next.

11 So I want to thank everyone who came  
12 for the full two hours and stuck with it, and  
13 that also helped us kind of get a sense of where  
14 folks were in terms of attendance. This has been  
15 a very informative session for us, Andrea has  
16 just linked in again, the links to the written  
17 comments. I do want to, again, thank the NOP  
18 team here, this is our first time doing this and  
19 I think, they did the best they could to balance  
20 a whole lot of different interests and unknowns.  
21 So I want to personally thank them for all the  
22 work that went into this session. We look

1 forward to the written comments as they come in  
2 before March 30th. So I appreciate everyone's  
3 time, and I think we are going to officially end  
4 the session there. So it is 2:50 Eastern Time.  
5 Thank you very much for joining us, and have a  
6 good afternoon. Be well, and take care.

7 MS. ARSENAULT: Thank you, Jenny.  
8 Thank you, everyone.

9 (Whereupon, the above-entitled matter  
10 went off the record at 2:51 p.m.)

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**A**

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