

In The Matter Of:
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
COMMENT WEBINAR DAY 1

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC STANDARDS PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB) COMMENT WEBINAR

Tuesday,

April 22, 2025

Held via Zoom for Government

National Organic Standards Board (NOSB) Members

Amy Bruch, NOSB Chair

Allison Johnson, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Kathryn Deschenes

Carolyn Dimitri

Amanda Felder

Andrea Hatziyannis

Cat McCluskey

Dilip Nandwani

Logan Petrey

Corie Pierce

Franklin Quarcoo

Kyla Smith

Javier Zamora (absent)

National Organic Program Staff, Standards Division

Erin Healy, Division Director

Jared Clark, Assistant Division Director

Andrea Holm, Agricultural Marketing Specialist

Heather Kumar, NOSB Food Technologist

Michelle Arsenault, NOSB Advisory Committee Specialist

Johanna Mirenda, Agricultural Marketing Specialist

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P R O C E E D I N G S

(Time: 12:00 p.m.)

ELECTRONIC VOICE: Recording in progress.

MS. ARSENAULT: All right. I can't see very many people. I imagine there's a lot of people on the line with us. Welcome, everyone. We're going to get started here at the top of the hour. I'm going to hereby call the National Organic Standards Board meeting to order and note that we did start the recording, so you guys know you're being recorded.

We're having two webinars this week, one today and one on Thursday, so we'll reconvene here on Thursday again. And I just want to thank everybody for joining.

My favorite time of year are the two Board meetings when I get to see all your faces and names. I only get to see you guys twice a year, and so I really appreciate you joining us today. We are going to also meet next week for our NOSB meeting, and I hope everybody knows by now that we are going to be virtual. So don't go to Arizona. We're not going to be there.

And if you're online, I'm going to go through a couple of administrative housekeeping slides for you. You should see the first slide on the screen. If you're on the phone only, especially, I'm just going to run through these quickly because you won't be able to see it.

1 Before we get started, I just want to highlight one
2 thing for you guys. The comment period closes on Monday,
3 April 28th, and if you've visited regulations.gov any time in
4 the last week, you've seen a note at the top of their screen
5 that they are going to be offline the entire weekend, the last
6 weekend of the comment period. So they're going to shut down
7 on Friday, April 25th at 5 p.m. Eastern Time, and they're
8 supposed to be back online by Monday, April 28th at 8 a.m.
9 Eastern time.

10 So if you haven't submitted any written comments yet,
11 you won't be able to submit during that period of time. So if
12 you can get them submitted before they close down for the
13 weekend, great. If not, you will still have Monday and will be
14 able to submit them, and Amy's going to remind you of that at
15 the end of the call and then on Thursday as well.

16 All right. So attendees, you're going to be on mute,
17 and you will not be able to unmute your line. The chat is
18 enabled. If you find your Zoom taskbar -- it may be solid at
19 the bottom of your screen, it may be floating around on your
20 screen somewhere -- you'll see the chat feature. You can chat
21 with each other or relate technical difficulties, but chats
22 aren't part of the public record, so not a public comment.
23 The Board members won't be answering comments if you happen to
24 put any in there.

25 Closed captioning and subtitles are available in

1 Zoom. If you click the Show Captions button, you can control
2 that for yourself without disrupting anybody else's screen.
3 You can turn it on, turn it off, or increase the font if you
4 would like.

5 There's also a Raise Hand feature in your taskbar.
6 We ask that you please don't raise your hand. A commenter is
7 registered in advance, and so we won't be calling on anyone
8 who's raising their hand.

9 You can customize your own view in Zoom. If you go
10 to the upper right corner, you'll see a View tab. You can
11 change from gallery view to speaker view, and don't worry,
12 changing that view in your own screen won't change it for
13 everybody.

14 We are going to pin the speaker timer, and the
15 speakers as they're talking and the Board members should be
16 visible on the screen as we go along, so you'll always see that
17 no matter how you change your view personally.

18 And, again, the webinar is being recorded. We have a
19 transcriptionist on the line with us, and we'll have a
20 transcript a couple of weeks after the close of the in person
21 meeting -- the NOSB meeting next week.

22 All right. Next slide. Thank you.

23 Speakers, we want to make sure that your name is
24 displayed in your video tile so we can locate you when it's
25 your turn to speak. You should be able to rename yourself.

1 I have that feature enabled. If you can't unmute yourself, we
2 can prompt you to unmute yourself, in which case you're going
3 to see a pop-up on your screen that says the host has asked you
4 to unmute yourself. When you're called on, please do unmute
5 yourself. You can turn your camera on if you want. It's
6 optional. You don't have to be on camera. And if you're only
7 on the phone with us and not in the Zoom meeting and don't have
8 a mute button, star six is what you use to toggle between mute
9 and unmute.

10 We ask that you come to the mic, state your name and
11 affiliation for the record at the start of your comment, and
12 then I'm going to start the timer for you. And the timer,
13 again, will be pinned on the screen so you'll be able to see
14 it. Each commenter has three minutes to speak, and then we
15 have time built in for questions from the Board members. So at
16 the end of your comment, the NOSB Chair will invite Board
17 members to ask questions, so don't automatically leave. You
18 may have questions from Board members.

19 All right. Next slide, please. I think that is it.

20 All right. Now I'm going to turn the mic over to
21 Erin Healy, who is the director of the Standards Division, for
22 welcoming remarks. Erin.

23 MS. HEALY: Thank you, Michelle, and hello, everyone.
24 Welcome. We're really excited to be able to hold these
25 webinars this week and the meeting next week. Thank you to the

1 public commenters. It's always interesting to hear from you,
2 and it's helpful to hear what you're dealing with out in the
3 field or along the organic supply chain and to hear directly
4 from you about what your needs are so that we can do our best
5 to support you.

6 As a reminder, this meeting will be run based on the
7 Federal Advisory Committee Act and the Board's Policies and
8 Procedures Manual, and Amy Bruch, our Board Chair, will
9 facilitate the sessions. We also remind everyone this is a
10 transparent process, so please do be respectful of each other.
11 That includes chat messages as well, so that means even if you
12 may disagree with someone, please be sure to provide them the
13 same respect and courtesy that you would want for yourself if
14 you were giving a public comment.

15 I want to recognize my team, the Standards Division.
16 There's a lot of work that goes on behind the scenes to
17 coordinate this meeting, and we worked under a tight timeline
18 this year. And the Standards Team also supports the Board in a
19 variety of ways. So I want to say thank you to Jerod Clark,
20 Joanna Miranda, Andrea Holm, Heather Kumar, Devon Pattillo,
21 Michelle Arsenault, and Jason Edmonson.

22 I also want to say thank you to the Board for our
23 continued collaboration, partnership, and dialogue as we
24 support the organic industry. And I especially appreciate the
25 Board's understanding and flexibility in accommodating a

1 shorter timeline between the comment period and the meeting
2 this time around. I know it was tough, so thanks for
3 understanding that just happened this year.

4 I'm going to hand the mic back to Michelle so she can
5 do a roll call for the Board members. Thank you.

6 MS. ARSENAULT: Thank you, Erin. I appreciate that.
7 I am off camera because, as you can see, I have my camera
8 pointed at the timer. Before I get started with roll call, I'm
9 going to test this timer, and you guys let me know if you can
10 hear it okay.

11 (Timer bell rings.)

12 MS. ARSENAULT: Mods comes up. Excellent. Okay.
13 All right.

14 MS. HEALY: It sounds delicate this time, Michelle.

15 MS. ARSENAULT: Is it faint?

16 MS. HEALY: It just sounds more delicate than the
17 buzzer we usually hear.

18 MS. ARSENAULT: That's good, I actually think.

19 Okay. I am going to call roll, and it's mainly to
20 test your mic, test your camera, make sure everything's working
21 for the Board members.

22 So, Amy Bruch.

23 CHAIR BRUCH: Good morning from the heartland.

24 MS. ARSENAULT: Good morning.

25 Brian Caldwell.

1 BOARD MEMBER CALDWELL: Thankful to be here. Hello,
2 everybody.

3 MS. ARSENAULT: Hello, Brian.

4 Kathryn Deschenes.

5 BOARD MEMBER DESCHENES: Hello.

6 MS. ARSENAULT: Hello.

7 BOARD MEMBER DESCHENES: Good to be here.

8 MS. ARSENAULT: Good morning.

9 Carolyn Dimitri.

10 BOARD MEMBER DIMITRI: Good afternoon from the Big
11 Apple.

12 MS. ARSENAULT: Good morning. Good afternoon,
13 Carolyn.

14 Amanda Felder.

15 BOARD MEMBER FELDER: Good morning.

16 MS. ARSENAULT: Good morning, Amanda.

17 Andrea Hatziyannis.

18 BOARD MEMBER HATZIYINNIS: Good morning, everyone.

19 MS. ARSENAULT: Hello, Andrea.

20 Allison Johnson.

21 VICE CHAIR JOHNSON: Good morning. Hello.

22 MS. ARSENAULT: Good morning, Allison.

23 Nate Lewis.

24 BOARD MEMBER LEWIS: Present from the Big Apple
25 State.

1 MS. ARSENAULT: Hi, Nate.
2 Kat McCluskey.
3 BOARD MEMBER MCCLUSKEY: Good morning, all.
4 MS. ARSENAULT: Good morning, Kat.
5 Dilip Nandwani.
6 BOARD MEMBER NANDWANI: Good morning.
7 MS. ARSENAULT: Hello, Dilip. Welcome.
8 Logan Petrey.
9 BOARD MEMBER PETREY: Good morning.
10 MS. ARSENAULT: Good morning.
11 Corie Pierce.
12 BOARD MEMBER PIERCE: Hello.
13 MS. ARSENAULT: Hi, Corie. Welcome.
14 Franklin Quarcoo. Franklin, you're muted.
15 Here we go. Say again, Franklin. I think it froze for a
16 second.
17 BOARD MEMBER QUARCOO: Can you hear me?
18 MS. ARSENAULT: Yep, can hear you now.
19 BOARD MEMBER QUARCOO: Okay. Great.
20 MS. ARSENAULT: Thank you.
21 Kyla Smith.
22 BOARD MEMBER SMITH: Hi, all.
23 MS. ARSENAULT: Hi, Kyla.
24 And for the record, Javier Zamora is absent.
25 All right. I am now going to hand the mic off to

1 Amy Bruch, the Chair of the NOSB, who's going to get us
2 started. Amy.

3 CHAIR BRUCH: All right. Thank you so much,
4 Michelle. Thanks to the NOSB, the NOP, organic stakeholders,
5 and all others. I sincerely appreciate everyone's time and
6 participation today. Again, I'm Amy Bruch. I'm a farmer based
7 in East Central Nebraska and your facilitator today. Outside
8 of today being a special day because it's our first day of
9 public comments, it's also Earth Day.

10 I want to extend a warm welcome to all the Board
11 members and thank you all for doing your best to prepare for
12 this session today, Thursday, and our upcoming Board meeting
13 next week. We have five new Board members who are just getting
14 started this year and are already making incredible strides.
15 I'm confident that they will be able to adapt quickly to our
16 process. Also, a big welcome to our new deputy director,
17 Christopher Purdy. We look forward to your leadership.

18 Special thanks to the NOP team. They do a lot of work
19 behind the scenes, getting everything ready for today's virtual
20 public comments, the virtual meetings, managing the logistics,
21 and keeping everything running smoothly, so a big thank you.

22 I have a few special reminders before we get to the
23 standard reminders, so here we go with the special reminders.
24 We will be managing the schedule as closely as possible
25 throughout the day. We need to end the webinar at the

1 scheduled time, so I'll do my best to facilitate that. I will
2 plan on doing one sweep of the names at the very end, if time
3 permits, for those commenters who missed their original
4 scheduled speaking slot.

5 We want to have a robust question and answer
6 exchange, but please be pithy on both sides of the equation so
7 we can fit as many questions as possible in the time allotted.
8 And also, don't worry, I'll be providing reminders to speakers
9 and Board members throughout the day on this. Big apologies
10 for any interruptions due to schedule management. One silver
11 lining, though, with what we have currently is that our written
12 comment process is still open and concurrent with this oral
13 comment webinar. So I highly encourage you all to take
14 advantage of that unique opportunity if there's additional
15 information you want to exchange with the Board.

16 I want to alert the community that there was also an
17 update to the docket. The wrong sodium bicarbonate sunset
18 write-up was submitted in handling and included in the full
19 meeting packet. This has been updated as of this morning. So
20 as already mentioned, there's still time to read the corrected
21 version and submit new comments on this material, sodium
22 bicarbonate. We apologize for that error.

23 Now, getting on to the standard reminders. I believe
24 there's a slide for this. The NOSB has a policy and procedural
25 manual about public comments. All speakers will be recognized

1 that signed up during the registration period. Persons must
2 give their names and affiliation for the record at the
3 beginning of their public comment. Proxy speakers are not
4 permitted.

5 Individuals providing public comment shall refrain
6 from making any personal attacks or remarks that might malign
7 the character of any individual or organization. We highly
8 value your comments, but please do not bring up personal names
9 or cause anybody to feel uncomfortable. Let's keep things
10 professional, respectful, and classy.

11 Members of the public are asked to define clearly and
12 succinctly the issues they wish to present before the Board.
13 This will give NOSB members a comprehensible understanding of
14 the speaker's concerns. I will call on speakers in the order
15 of the schedule and will announce the next person or two so
16 they can prepare. And please, please correct me if I do
17 mispronounce your name. Please also remember to state name and
18 affiliation, and then we'll start the timer after that.

19 Board members will indicate to me if they have
20 questions, and I will call on them generally in the order in
21 which hands are raised. If we have a lot of questions for a
22 particular speaker, I'll do my best to call on new voices as
23 well that have their hands up. Board members, please get my
24 attention also if I do not see your hands, and just speak up as
25 well. Only NOSB members are allowed to ask questions.

1 Reminder to the Board, again, not to convey any opinions or
2 comments during this webinar. We're going to get into the
3 deliberation during our upcoming meeting.

4 Lastly, looking forward to a great meeting. I'm
5 excited to hear from our community and to see our new members
6 dive in. Without further ado, I'm going to list some of the
7 speakers that have signed up. And now we have, first off, Mark
8 Kastel. And then on deck we have Terry Shistar and Beth Rota.

9 Okay. Mark, without further ado, please begin.

10 MR.KASTEL: Thank you. Thank you, Madam Chair. My
11 name is Mark Kastel. I'm the Executive Director of OrganicEye,
12 a farm policy research group based in La Farge, Wisconsin.

13 When we lobbied for passage of OFPA, the USDA
14 testified against the legislation. During the Clinton
15 administration, Secretary Glickman said there was no difference
16 in organic food, that it was just a marketing scheme. The Bush
17 administration successfully monkey-wrenched rulemaking, taking
18 12 years to enact, and then an abysmal job of enforcement.
19 During the Obama-Vilsack administration and under President
20 Biden, the red carpet was rolled out for corporate agribusiness
21 lobbyists and their patrons, who were hired inside the
22 Secretary's office, the NOP, and appointed to the NOSB. The
23 result, despite the meteoric growth of this industry, the U.S.
24 is stuck at an anemic 1 percent of organic acreage.

25 Remember, this was a farming movement when it began.

1 Unlike many countries in Europe the acreage is in the double
2 digits. What's making up the difference? Cheap, often
3 fraudulent imports, livestock factories, and hydroponics,
4 radically reducing the opportunity for authentic organic
5 farmers to make a living. And we've lost thousands and
6 thousands more that could have transitioned, but they were shut
7 out of the market. The current USDA Secretary has little, if
8 any, professional experience in production agriculture, and as
9 far as I know, has never substantively mentioned organics. Our
10 Hail Mary passed.

11 You can send a message from the resources tab at
12 organiceye.org to HHS Secretary Kennedy without taking a
13 position on anything else he is impacting in government. He's
14 the only high official in recent history who has publicly
15 embraced organics as a pathway to healing our chronically ill
16 citizenry. Let's hope he can use his political clout to
17 reverse the crisis at the NOP.

18 On this meeting's agenda, don't get fancy. The cost
19 to test all organic food being imported is infinitesimally
20 small compared to the billions in commerce that are hitting our
21 shores and the millions U.S. farmers are paying in aggregate
22 for certification. Test it all.

23 Depending on inadequately red flagging, quote, high-
24 risk shipments, that's going to fail. It's not the definition,
25 but if, in fact, you go that route it should include high-risk

1 countries like Turkey, China, and India, not just the crop
2 types. We need to free up funds for more aggressive
3 unannounced inspections and testing. Many legacy certifiers
4 are violating the law, preventing conflicts of interest. We
5 can't depend on their judgment in terms of what constitutes
6 high risk.

7 Thank you very much for your time and attention.

8 CHAIR BRUCH: Thank you, Mark. Really appreciate
9 your comments today and ending early.

10 Any questions for Mark?

11 (No response.)

12 CHAIR BRUCH: All right. I'm not seeing anything,
13 Mark.

14 MR.KASTEL: Okay.

15 CHAIR BRUCH: Thank you again. Really appreciate
16 that.

17 Next up we have Terry Shistar, and I believe she has
18 some slides here. Then Beth Rota is on deck, and Scott Rice.

19 MS. SHISTAR: Okay. I'll wait until I see the slides.

20 Okay. My name is Terry Shistar. I'm on the Board of
21 Directors of Beyond Pesticides. We've submitted written
22 comments on all the issues before the Board. Today I'm going
23 to talk about alkylphenol ethoxylates and inert ingredients.

24 Next.

25 Iodine is often formulated with alkylphenols and

1 their ethoxylates. The original proposal to prohibit
2 alkylphenol ethoxylates has been scaled back to prohibit only
3 nonylphenol ethoxylates. We support the original proposal.

4 Nonylphenols belong to the larger class of
5 alkylphenols, which may be ethoxylated to form alkylphenol
6 ethoxylates. Among the breakdown products of alkylphenol
7 ethoxylates are alkylphenols, which are more toxic and more
8 potent endocrine disruptors. Although the class of
9 alkylphenols includes short-chain molecules, toxicity and
10 estrogenicity are mostly limited to the longer-chain
11 alkylphenols, nonylphenols, alkylphenols, and dodecylphenols,
12 and the metabolites of their ethoxylates, which also differ
13 from the shorter-chain molecules and other properties and uses.
14 We use alkylphenols to refer to these longer-chain chemicals.

15 Next.

16 EPA summarizes the fate and toxicity of nonylphenol
17 and alkylphenol ethoxylates as persistent and highly toxic to
18 fish, aquatic invertebrates, and aquatic plants with more toxic
19 degradants. Alkylphenol ethoxylates have low toxicity to
20 humans, but alkylphenols are highly irritating and corrosive to
21 skin and eyes. They are potential carcinogens, hepatotoxins,
22 genotoxins, and behavioral modulators affecting basic survival
23 reflexes.

24 Most importantly, alkylphenols and their ethoxylates
25 are estrogenic endocrine-disrupting chemicals, or EDCs.

1 Nonylphenol is among the first xenoestrogens identified in the
2 environment. Alkylphenols and their ethoxylates act as
3 estrogen in human cells. Since sexual development and behavior
4 depend on a delicate balance of male and female hormones, it is
5 not surprising that xenoestrogens have been implicated in a
6 wide range of impacts, from reduced sperm counts, to changes in
7 the size of ovaries and testes, to stimulating the growth of
8 breast cancer cells.

9 Recognizing that hormones act at low doses, and low
10 doses sometimes have greater effect or opposite effect from
11 higher doses, the aim should not be to reduce exposure, but
12 eliminate exposures to EDCs. Iodine listing should not permit
13 alkylphenols or their ethoxylates. We encourage the NOSB to
14 commission a technical review addressing all alkylphenols.

15 Next.

16 List 4 inerts include some nonylphenols and
17 nonylphenol ethoxylates, which should be a reminder that the
18 NOSB should not issue a blanket renewal for List 4.

19 Thank you.

20 CHAIR BRUCH: All right. Excellent. Thank you,
21 Terry. Really appreciate that. Any questions for Terry?

22 I see Nate. Go ahead.

23 BOARD MEMBER LEWIS: All right. There we go.
24 Thanks, Terry. I think I just wanted to touch on the
25 alkylphenol and nonylphenol ethoxylate annotation proposal.

1 And as you mentioned, we had originally proposed the broader
2 class of alkylphenol ethoxylates, and then we heard from public
3 comments last fall that that could be a challenging annotation
4 to enforce. And just as a reminder, most livestock products
5 are not registered with OMRI, so most of these iodines are
6 being approved by certifiers specific to the operations.

7 And so I think what we've tried to do here is sort of
8 find the compromise between sort of, sure, we want to prohibit
9 all of these things, but we also want the annotation to be
10 clear and easily enforceable so that we have the most impact on
11 -- or most beneficial impact on the industry.

12 So I'm just sort of curious if you have some opinion
13 or comments on this sort of compromise approach, taking into
14 account the need to make sure that the annotation is easily
15 enforceable by certifiers.

16 MS. SHISTAR: I'm not sure that I understand all of
17 the difficulties in doing this, but octylphenols in particular
18 are more toxic than nonylphenols, so not addressing them would
19 be a mistake. And I also think that a piecewise approach is
20 not really very workable. We're going to -- you know, you'll
21 have comments from people like us and Consumers Union and
22 others who are going to say you need to address the larger
23 group, which means that the rulemaking will get hung up. And
24 so I think that -- you know, I think it's better to try to
25 address them all at once, and the question you asked me I think

1 should be addressed in a technical review.

2 CHAIR BRUCH: Thank you, Terry.

3 Any other questions for Terry?

4 (No response.)

5 CHAIR BRUCH: All right. Really appreciate your
6 technical expertise.

7 We have Beth Rota next, then Scott Rice, and Ryan
8 Baker.

9 Beth, state your name and affiliation, please. Thank
10 you.

11 MS. ROTA: Hello and Happy Earth Day. My name is
12 Beth Rota, and I'm the Director of Quality and Accreditation at
13 Quality Certification Services. QCS is a midsize certifier
14 with organic operations across the U.S. and in eight foreign
15 countries.

16 First, I want to recognize the value of the National
17 Organic Program. A fully funded and staffed NOP is vital to
18 ensuring a level playing field for organic producers and
19 certifiers, overseeing organic imports, and maintaining
20 worldwide trust and value in the USDA organic label.

21 Next, I would like to applaud the Compliance
22 Accreditation and Certification Subcommittee's outstanding work
23 on risk-based certification and residue testing. We truly
24 understand the certifier's role and how updated guidance will
25 promote consistency and improve oversight. Bravo and thank

1 you. QCS fully supports the risk-based certification proposal
2 and looks forward to collaborating with certifiers and the NOP
3 to develop a robust system to oversee risky operations and
4 supply chains while minimizing burdens for low risk operations.

5 Regarding residue testing for a global supply chain,
6 I will summarize three points from our extensive written
7 comments. First, organic certifiers would benefit if NOP 2613
8 added guidance for evaluating residues on non-edible plant
9 parts that are not tied to tolerance limits. Because
10 inspectors must verify that prohibited substances have not been
11 applied, we should not limit pesticide residue testing to
12 edible crop commodities. Our sampling protocols should also be
13 looking for prohibited pesticides that could have been applied
14 well before the harvest period and to non-food plants like
15 wheat. Certifiers should be encouraged and instructed to
16 include risk-based testing for residues, even where EPA and FDA
17 limits do not apply, to fully assess compliance with the USDA
18 organic regulations.

19 We support the subcommittee's proposal to rename
20 NOP 2611 and expand its testing guidance and best practices.
21 We would like additional guidance for testing based on
22 identified risks, especially regarding the use of single
23 residue analysis for risks not covered by multi-residue testing
24 methods, and testing for other prohibited substances like
25 hormones, antibiotics, and synthetic solvents as part of the

1 5 percent minimum testing requirement.

2 Regarding NOP 2610, when samples collected in the
3 supply chain downstream of production test positive, it can be
4 very difficult to determine the source of contamination. This
5 is especially true for bulk products with lots mixed from
6 multiple producers like livestock feed or bulk grains.
7 Products like these can be high risk precisely because their
8 supply chains are complicated. Thus, we encourage the NOSB,
9 NOP, and the certifier community to work together to better
10 identify critical control points within supply chains and
11 coordinate sampling beyond the operator level.

12 Thanks so much for this opportunity to comment.

13 CHAIR BRUCH: Thank you, Beth. Really appreciate
14 your time today and getting those written comments in early.

15 Any questions for Beth?

16 (No response.)

17 CHAIR BRUCH: Okay. Not seeing any.

18 Beth, I just have a general question. I appreciate
19 just all of what you provided in your written comments and
20 oral. Can you elaborate more on some best practices in how we
21 can reconcile and verify documents that certificate holders
22 prepare for inspections so we can make sure they're authentic?
23 Do you have any general guidance on reconciliation and
24 verification in our process-based system?

25 MS. ROTA: To verify that the records we're reviewing

1 at inspection are authentic?

2 CHAIR BRUCH: Mm-hmm.

3 MS. ROTA: That's a really great question, Amy. You
4 know, things that we're looking for in records are looking for
5 like the natural variation we would see in records with
6 different dates, different amounts, that type of thing, and
7 looking for consistency between records. It would be a red
8 flag if, you know, a record was always maintained at the same
9 time or volumes harvested were always exactly the same amount.
10 We might have questions at that point.

11 But, yeah, I mean, records are something that are
12 being documented when we're not there to see it happen to
13 describe events that we weren't there to see happen. So we
14 could certainly look for some best practices as far as looking
15 for red flags in records, but knowing when a record is
16 fabricated is pretty difficult, I would say. Yeah.

17 CHAIR BRUCH: Thank you, Beth. I really appreciate
18 your time today.

19 Any other questions for Beth?

20 (No response.)

21 CHAIR BRUCH: All right. Okay. Next up we have
22 Scott Rice. Then on deck, Brian Baker, and Chuck Benbrook.

23 Scott, please state your name and affiliation.

24 MR. RICE: Hello, and Happy Earth Day to all. My
25 name is Scott Rice, and I'm the Senior Director of Regulatory

1 Affairs at the Organic Trade Association, a leading voice for
2 organic trade in the U.S., whose mission is to grow and protect
3 organic with a unifying voice that serves and engages its
4 diverse members from farm to marketplace. I also serve on the
5 Organic Materials Review Institute Board of Directors, and am a
6 past member of the NOSB, serving in the certifier seat prior to
7 Kyla. A warm welcome to the five new members as you settle
8 into your first meeting.

9 OTA submitted written comments on a slate of topics
10 on behalf of our members, and I'll take a moment to address two
11 of these, the Board's work on residue testing, and compost. We
12 support the Board's efforts to update the instruction and
13 training documents that direct certifiers in residue sampling
14 and testing. Updates needed to keep pace with evolving
15 technology and an organic landscape that's changed since first
16 written.

17 We're especially supportive of viewing these through
18 a risk-based lens to best use time and resources. We're glad
19 to see the emphasis on selecting samples for which there can
20 likely be a successful outcome to an investigation. Failure to
21 make this consideration can lead to a heavy investment of time
22 and resources of multiple parties, with no satisfactory
23 resolution nor contribution to validating organic integrity.

24 Consistency in the application of risk and in the
25 response to testing results is key to ensuring a fair and even

1 business environment. OTA supports the efforts to remove
2 uncertainty when results show presence of a substance for which
3 there is no EPA tolerance or FDA action level, resolving
4 inconsistencies in the outcomes of self-reported drift versus a
5 response to positive residue samples, and establishing a common
6 approach when evaluating samples of concentrated products.

7 While ensuring consistency in the domestic market is
8 essential, we see an equal need in export markets. We
9 encourage NOP to work with our trading partners to drive
10 consistency in response to positive presence of prohibited
11 substance in export markets.

12 Turning to compost, we appreciate the Board's
13 thoughtful consideration of compost and the feed stocks that go
14 into its production. As the Board continues its review, we
15 reiterate our suggestion from the fall that it also address the
16 wide use of non-compostable plastics, as used in mulch film for
17 instance, and the potential for alternatives such as
18 biodegradable, bio-based mulch.

19 While mulch presents an opportunity in the field,
20 organic consumer preferences are pointing to similar
21 opportunities in the produce and grocery aisles. Results from
22 our organic market survey show a clear interest by organic
23 consumers in packaging sustainability, the elimination of
24 plastic, and the use of compostable packaging. While organic
25 may not be able to meet every consumer expectation, there is

1 real opportunity it can embrace some of these sustainability
2 goals if we find substances that align with our common organic
3 vision. Creating a dichotomy between organic certification and
4 sustainable packaging will create headwinds for growing the
5 organic marketplace and organic adoption by sustainability-
6 minded consumers.

7 I thank you for your considered work on this and all
8 the topics before you. I wish you the best for your meeting
9 this week next.

10 CHAIR BRUCH: Excellent. Thank you, Scott. Really
11 appreciate that.

12 Any questions for Scott from the Board?

13 (No response.)

14 CHAIR BRUCH: All right. Not seeing anything, Scott.
15 Thank you so much for your contributions today and your
16 commitment to integrity. Appreciate that.

17 Right now we have Brian Baker, and then after Brian
18 we'll have Charles Benbrook and Rebecca Robinson.

19 Go ahead, Brian.

20 MR. BAKER: All right. Thank you for the opportunity
21 to comment and for all your good work. I'm Brian Baker
22 speaking on behalf of Org Tracker, currently a project of the
23 Heartland Health Research Alliance. Please refer to our
24 written comments for both this meeting and previous meetings in
25 fall and spring of 2024.

1 Our comments are focused on residue testing and risk-
2 based certification, and we suggest that the definition of
3 unavoidable residual environmental contamination, or UREC, be
4 revised to read, quote, the presence of prohibited substances
5 and excluded methods in organic food and organically managed
6 soil that result from circumstances beyond the control of
7 organic operators, unquote.

8 We also urge the NOSB to recognize and recommend that
9 risks posed to human health be given priority over risks of
10 noncompliance. The two types of risks are interrelated but
11 they're not identical. We ask that exclusion of sale be based
12 on scientific evidence of dietary risk rather than a fixed
13 percentage of EPA tolerances, particularly in cases where EPA
14 tolerances and FDA action levels are not established and the
15 evidence clearly shows that the inadvertent residues were
16 caused by circumstances beyond the operator's control.

17 The NOSB should also recommend ways to prevent
18 avoidable risks such as the legacy pesticides in the soil that
19 continue to pose human health risks years after they were
20 banned. Certifiers in the program should prioritize
21 identifying levels of pesticides that present risks to human
22 health. Doing so will require research and analysis of the
23 data collected by certifiers, the USDA's Pesticide Data
24 Program, the FDA, and other food safety authorities.

25 Such data can be used to predict which operations are

1 more likely to pose risks based on certain factors. The
2 results can be used to more efficiently and more effectively
3 conduct unannounced inspection and sample to test for
4 prohibited substances. For example, requiring a random
5 selection of certified operations over-samples small producers
6 and under-samples large producers with a greater market share.

7 A more sound and sensible approach is to sample a
8 percentage of the certified land or certified product. Some
9 crops show a higher probability of prohibited residues or
10 excluded methods, while others have a much lower set of
11 positive results for these analyses. We should be using that
12 information. Similarly, some countries of origin appear to be
13 more likely to have residues of prohibited pesticides on
14 organic products than others.

15 We are happy to further explain our proposed
16 approaches for residue testing, UREC, and risk-based
17 certification, and welcome your questions. Thank you.

18 CHAIR BRUCH: Excellent, Brian. Thank you so much.

19 Any questions for Brian?

20 (No response.)

21 CHAIR BRUCH: Brian, I have a quick question myself
22 in the line of residue testing.

23 MR. BAKER: Okay.

24 CHAIR BRUCH: Hopefully you'll be submitting written
25 comments so we can unpackage a little bit more of what your

1 oral one said. I just wanted to ask you about just a general
2 concept between like the line of demarcation between your
3 experience with a positive residue sample that was more or less
4 UREC-related versus a positive residue sample that was more
5 fraudulent related. I believe in previous written comments you
6 mentioned there was a good distinction, essentially, between
7 the two.

8 MR. BAKER: Yes. One of the things we think is a
9 good indicator of fraud is whether a residue is about what one
10 would find unconventional. Even if conventional residues are,
11 on average, lower than five percent of EPA tolerance, that
12 doesn't mean that the product was grown without the use of
13 prohibited pesticides. So the indication of if it looks like a
14 duck and walks like a duck, call it a duck. It's if it looks
15 like a conventional product based on the analysis, then it
16 should be investigated as such.

17 On the other hand, what we find in a lot of cases
18 where there are pesticides for which there is no established
19 tolerance because the pesticide is not registered for use on
20 that crop, it is most likely to be the result of application
21 off the farm and drift. And a lot of times we're seeing not
22 just drift but, for example, the Central Coast of California,
23 when I was working for CCOF we frequently would encounter
24 situations where applications would be made when it was foggy.
25 And when the fog would lift and the wind would start to blow,

1 you could see pesticides that were applied to a field a quarter
2 mile away deposited on an organic field.

3 CHAIR BRUCH: I'm going to just jump in here, Brian,
4 because I see another hand. I really appreciate your response
5 there. We're just going to kind of keep going to the next
6 hand.

7 Kathryn, do you have a question here?

8 BOARD MEMBER DESCHENES: Sure. So you mentioned
9 research would be needed. What sort of research would you
10 suggest is like the first step?

11 MR. BAKER: Yes. Well, let's look at what we're
12 finding. We've got all this data from -- you know, we've been
13 looking at the USDA's pesticide data program for over 20 years.
14 And we can look at which crops are the most likely to have
15 residues, which ones are the least likely, target sampling of
16 those high-risk crops. We can also look at location. So we
17 can take the data, and we can say that, you know, perhaps down
18 to the county level, say where we can find hot spots out in the
19 countryside where these pesticides are more likely to turn up.

20 Countries of origin is another one where we're
21 finding in the pesticide data program certain countries of
22 origin have a much higher probability of having positive
23 samples come across the border on organically labeled produce.

24 CHAIR BRUCH: Excellent. Thank you, Brian, for that
25 response.

1 Thanks for the question, Kathryn.

2 We are going to move on to our next speaker just for
3 the interest of time. And definitely, Brian, if you have more
4 to contribute -- I apologize to interrupt -- please use the
5 written comment docket, please.

6 All right. We have Chuck Benbrook followed by
7 Rebecca Robinson and then Tim Harder. Thank you.

8 MR. BENBROOK: Thank you, Amy. And a special welcome
9 to the five new members of the NOSB.

10 Amy, you raised a really important question with
11 Brian that is discussed in more detail in our written comments.
12 We're familiar with how the UREC concept applied to persistent
13 residues of organochlorine insecticides in soil and could show
14 up in carrots and cabbage and squashes of certain crops.

15 But organic farmers today face kind of a UREC problem
16 from contemporary used pesticides. Like, Amy, where you live,
17 there might be a little dicamba or 2,4-D floating around in
18 late spring and early summer, or glyphosate from a pre-harvest
19 application of glyphosate or some other herbicide.

20 So if a little bit of herbicide drifts onto one of
21 your crops, your organic crops, and it's detectable at a very
22 low level, should you lose the opportunity to sell your entire
23 crop as organic? Well, only if there's a reason.

24 And we've introduced the concept of inadvertent
25 residues in our papers, which basically is a residue at one-

1 tenth or less of the mean of the same chemical found in nearby
2 or other conventionally grown crops with the same pesticide.
3 We are fairly confident that any residue in any food at a one-
4 tenth of the level of the mean in conventional probably wasn't
5 applied at a level to control a pest. So that's the concept.

6 Is it possible, Michelle, for me to share my screen?
7 I guess maybe not.

8 MS. ARSENAULT: Yeah, no. Thank you.

9 MR. BENBROOK: Okay. I guess the proper protocol is
10 to send you the slides before the call, So I'll make sure I do
11 that next time.

12 I wanted to update everyone on progress in getting
13 the Ford Tractor System operational. Things are going along
14 nicely. We'll have a website ready to share with certifiers,
15 NOP, and others in the organic community in a month or maybe a
16 little more. The initial website will have a number of
17 interactive tables that have been designed to meet the needs of
18 certifiers to understand what their residue data is telling
19 them.

20 There will be substantial information on the
21 methodologies and the data sources that are embedded into Org
22 Tracker, and the Dietary Risk Index System on which Org Tracker
23 sort of sits as a module to compare the residues in
24 conventional and organic foods.

25 The other question brought up by an NOSB member is

1 really critical. What research needs to be done? Well,
2 analytically we just need to know the levels and risk levels in
3 organic food compared to conventional foods so we know when it
4 makes sense to invest resources in mitigating them. Thank you.

5 CHAIR BRUCH: Chuck, thank you so much for
6 incorporating some of our questions into your public comment
7 right now. I see a hand by Logan, but before we get to Logan,
8 I want to make sure you state your name and affiliation. I
9 forgot to remind you at the top of your speech.

10 MR. BENBROOK: I'm sorry. Charles Benbrook, Org
11 Tracker team with Brian Baker, a project of the Heartland
12 Health Research Alliance.

13 CHAIR BRUCH: Thank you, Charles.

14 Logan, go ahead.

15 BOARD MEMBER PETREY: Yeah, hey, thank you. You kind
16 of answered what I was getting to. But when you said, you
17 know, the tolerance levels or the residue testing that is on a
18 crop, you said something about the one-tenth -- If it's one-
19 tenth, then we assume that it was not made with the intention
20 to control pests.

21 So my question is, do we have data? Is there data of
22 certain types of chemicals, knowing their labeled rates,
23 knowing the crop on which they're used, knowing the PHI of
24 those materials? I'm a vegetable farmer, so I'm kind of
25 speaking in those terms.

1 But knowing what that typical program is, do we know
2 the tolerance of crops, of corn, and what would show to assist
3 with what an expected tolerance to show that this is drift or
4 this actually could be an application made because of that
5 level?

6 MR. BENBROOK: Yes. The tables that Org Tracker will
7 generate will translate each detected residue by a certifier or
8 by the US PDP program or the UK FSA program into compliance
9 with NOP rules -- i.e., 5 percent of tolerance -- as well as
10 whether it's an inadvertent residue, i.e., it's a residue
11 that's one-tenth or less of the mean of the residues in
12 conventionally grown crops.

13 There is substantial data, Logan, especially in
14 fruits and vegetables, because fruits and vegetables are by
15 statute the focus of the US PDP program which is the best
16 residue testing program in the world. Everybody recognizes
17 that. We have all the PDP data back to 1992 in the DRI system,
18 and we've generated tens of thousands of tables showing trends
19 in risk, levels of risk by food, by pesticide, by food form, by
20 domestic, by imported, by conventional, by organic, and
21 combinations of all of those.

22 So there is so much data that can now be used.
23 And when the certifier data is in Org Tracker, the number of
24 samples in organic food will probably go up -- I'm going to
25 guess something like tenfold -- which will allow very

1 sophisticated statistical analysis of the differences in
2 residue frequency and risk levels in organic food versus
3 conventional food.

4 And this is the payoff to Org Tracker. A big part of
5 it is to certifiers, organic farmers, and the NOP. But another
6 big part of it is for public health research and the food
7 industry so everyone can understand where the risks are --
8 where the real risks are that are worth mitigating.

9 CHAIR BRUCH: Excellent. Thank you so much.
10 Sorry to jump in here. I really appreciate that exchange and,
11 Charles, your contributions to our community. I'm going to
12 unfortunately have to move to our next speaker just out of the
13 interest of time. So thank you.

14 We're going to go to Rebecca Robinson next, and then
15 Tim Harder, you're on deck, and Michael Croster.

16 Go ahead, Rebecca, please state your name and
17 affiliation.

18 MS. ROBINSON: Hi. Rebecca Robinson. I'm the
19 Quality Standards Manager at PCC Community Markets. Firstly,
20 welcome and thank you to Deputy Director Chris Purdy and the
21 new NOSB members.

22 I submitted written comments, so right now I'm going
23 to talk broadly about consumer trust and plastics. PCC is a
24 cooperative grocer with 15 stores in the Puget Sound area
25 serving over 118,000 active members. We're a certified organic

1 retailer and have been a vocal proponent of organic for
2 decades, even before the federal standard. We're also active
3 members of OTA and NOC. PCC cares deeply about the integrity
4 of organic as the only eco-certification that is backed by
5 federal law, which is so unique and adds this extra layer of
6 rigor.

7 So consumer confidence and trust in the organic seal
8 is so important for a retailer like PCC, and we hold great
9 value in being able to direct shoppers towards organic options
10 when they're trying to avoid food additives, GMOs, and
11 pesticides. That's why we're particularly focused on some
12 existing gaps and newer issues where we see potential for
13 losing consumer trust. As a community, we've accomplished so
14 much with SOE and OLPS, and we'd really like to see more
15 discussion and attention paid to issues like organic seed
16 supply and use, and contamination from heavy metals and PFAS,
17 aka forever chemicals.

18 We're also highly concerned about the lingering EPA
19 inert ingredient listings. We know rulemaking is now with NOP,
20 and we hope they're moving quickly and prioritizing that work.
21 We see that topic as a significant vulnerability for organic in
22 terms of that gap between consumer perception of organic and
23 the reality of organic regulations.

24 Plastic contamination is a huge crisis that isn't
25 isolated to organic, but we've always held ourselves to a

1 higher standard, and we should continue to do that when it
2 comes to the role of plastic in organic. And that's why we're
3 opposed to allowing synthetic bioplastics in compost feedstocks
4 approved for organic agriculture.

5 As a retailer committed to sustainability, we
6 generally support alternatives to traditional plastics because
7 they're not made from petroleum, so on the production side,
8 that's really good. But we don't think that they have a role
9 in organic compost, especially given some of the concerns
10 around biodegradability and PFAS in the fiber-based materials.

11 Thank you.

12 CHAIR BRUCH: All right. Rebecca, thank you so much
13 for your time today. I see one question from Brian. And just
14 as a reminder, please speak as clearly as possible. We have a
15 lot to pack in here today, and let's do as best as we can on a
16 succinct question and answer so we can get more questions in.

17 Thank you, Brian. Go ahead.

18 BOARD MEMBER CALDWELL: Yeah, Rebecca, thank you so
19 much. I really appreciate all the work that you folks do. And
20 I'm wondering, my local co-op seems to have like a ridiculous
21 amount of plastic packaging on the organic produce, and I'm
22 just wondering whether on the wholesale or retailer side of
23 things you folks are -- whether there's any industry efforts to
24 try to reduce that. In other words, not necessarily through
25 the NOP, but just on kind of your own basis.

1 MS. ROBINSON: Yeah, that's a great question. You
2 know, PCC works closely with Organically Grown Company, and
3 they have been working to find solutions to minimizing
4 packaging. I believe a lot of it comes down to trying to
5 prevent spoilage and protecting produce when it's being
6 transported.

7 Our merchandising team also works to find options
8 that are package-free. A lot of that work is in the supplier
9 and like merchandiser relationship -- or the purchaser, they're
10 called merchandisers at PCC. And so, you know, they talk to
11 vendors and say, hey, you've been giving us these breaks that
12 are in plastic. What can we do to work on getting -- you know,
13 you do not use plastic bags?

14 And that's an actual example working with a specific
15 produce supplier, and we got them to switch to this little like
16 cardboard totes, and it's, you know, it's small things like
17 that, but a lot of it comes down to those relationships and
18 everybody kind of working together on those different pieces.

19 BOARD MEMBER CALDWELL: Great. Thank you so much.

20 CHAIR BRUCH: Excellent. Thank you so much, Rebecca,
21 for your time today.

22 Thanks for the question, Brian.

23 And we are going to go to the next speaker. So I
24 have Tim Harder, and then on deck we have Michael Crotser and
25 Jay Feldman.

1 So, Tim, please state your name and affiliation.

2 Thank you.

3 MS. ARSENAULT: Amy, we still don't see Tim on the
4 line with us so --

5 CHAIR BRUCH: Okay. Thanks, Michelle.

6 MS. ARSENAULT: -- again, still not here.

7 CHAIR BRUCH: Okay. Perfect. Well, we will call his
8 name at the end. We will move on to Michael Crotser. And then
9 on deck, Jay Feldman and Scott Myers.

10 So please state your name and affiliation.

11 MR. CROTSEY: I am Michael Crotser, and I'm the
12 Director of Certification at CROPP Cooperative. I wanted to
13 express my appreciation for the public comments. These
14 comments are critical to voice business needs and maintain a
15 strong USDA seal. I want to emphasize the importance of face-
16 to-face meetings. In-person meetings give us the opportunity
17 to build professional relationships, develop understanding of
18 the rule, and allow collaboration to bring healthy, value-added
19 products to the market. I hope the next time we meet it will
20 be in Omaha.

21 First off, let's talk about the Handler Sunset List,
22 sodium hydroxide. We support the relisting of sodium
23 hydroxide. Sodium hydroxide is used in culinary steam for
24 direct contact with organic food. Use of sodium hydroxide is
25 essential for the conversion of bulk butter to anhydrous milk

1 fat. We don't know of alternatives. Anhydrous milk fat is an
2 ingredient in our ghee -- our retail ghee -- and we also sell
3 it to bulk customers.

4 Next I want to talk about sanitizer compliance in the
5 fluid dairy transport industry. I know I discussed this four
6 years ago. We are still seeing some challenges of it. The
7 dairy industry today is in short supply of organic milk. As a
8 community, we need to try to do a better job at minimizing the
9 rejection rates of organic milk tankers as they are delivered
10 to production facilities.

11 The following changes are needed to address these
12 concerns and avoid economic concerns. One, tankers are shared
13 between conventional and organic operations. After a tanker is
14 sanitized at a conventional plant, operators must confirm the
15 last-step sanitizer is approved by their certifier. If not,
16 organic milk is loaded, and then this tanker is at risk of
17 rejection downstream.

18 Although water rinses are allowed to remove no-
19 contact sanitizers, the intervening event is not noted on wash
20 tags. More importantly, water rinses can introduce bacteria
21 and are prohibited by the pasteurized milk ordinance. Water
22 rinses are not directed in most label instructions either.

23 Solutions. Certifiers should develop and share a
24 comprehensive list of allowed materials by trade name, and the
25 purpose is so operators can verify compliance in real time.

1 Certifiers must review wash tags for compliance. Number three,
2 all wash tags must document the last-step sanitizer with
3 correct spelling. Four, unless supported by the label or PMO,
4 water rinses must be eliminated.

5 Number five, OSPs must describe the protocol of
6 reviewing outside sanitation events. Number six, new active
7 ingredients should be considered if they meet the require of
8 OFPA. New chemistry would also benefit microbe-resistant
9 management. We ask the NOP and NOSB to facilitate resource
10 development so the industry and certifiers can work towards a
11 solution.

12 Thank you for your time.

13 CHAIR BRUCH: Excellent. Thank you so much, Michael.

14 Any questions for Michael today?

15 (No response.)

16 CHAIR BRUCH: All right. Really appreciate your
17 comments, and looking forward to reading your written ones.

18 We are going to move on to Jay Feldman, and then we
19 have Scott Myers and Kate Mendenhall.

20 Go ahead, Jay. Please state your name and
21 affiliation.

22 MS. ARSENAULT: Jay, you're on mute. You should be
23 able to unmute. There you go.

24 MR. FELDMAN: Hi. Can I start?

25 CHAIR BRUCH: Yeah. We can hear you.

1 MR. FELDMAN. Okay. Hi. I'm Jay Feldman, Executive
2 Director of Beyond Pesticides, and a former NOSB member.
3 Thank you, NOSB members, for your service.

4 The question thematic to this NOSB meeting is whether
5 we can grow the organic sector with the integrity principles
6 and values integral to the Organic Foods Production Act and
7 essential to public trust in the USDA Organic Food Label. This
8 is foundational to the Board's decisions at this meeting.

9 There is no element more central to the organic
10 system than soil and what we allow to be put into the soil.
11 OPFA includes the requirement to, quote, foster soil fertility
12 primarily through management of the organic content of the
13 soil, end quote, which is fundamental to an organic system's
14 plan.

15 In this context, the Board must concern itself with
16 the content of the compost or the substances that are allowed
17 in the compost. That is not new to Board deliberations going
18 back to the original organic rule which prohibited biosolids
19 expressly because of the content of the contamination in sewage
20 sludge. Nothing has clarified the importance of that decision
21 decades ago than the findings of PFAS contaminated soil
22 nationwide.

23 With a commitment to continuous improvement, we ask
24 NOSB members to redouble your efforts to, one, allow only
25 synthetic materials in compost that is specifically added to

1 the National List, two, integrate the work of the Crop
2 Subcommittee from over a decade ago to define the pathways of
3 contaminants to organic farms and the extent to which
4 contamination can be mitigated by composting and other
5 practices, and three, reject BPI's petition to allow compost
6 feedstocks and a broad allowance of so-called compostable
7 polymers, raising the plastics' inorganic concern.

8 As we note, soil organisms and edible plants take up
9 microplastic particles. Microplastics move through the food
10 chain. They have a wide range of negative impacts on the soil,
11 including a reduction in growth, reproduction, and function of
12 soil microfauna and microflora.

13 Eliminate non-organic ingredients in processed
14 organic foods on 606 since they can be supplied in the organic
15 form. In our written comments, we document the adverse effects
16 of producing these product ingredients in a chemical-intensive
17 system, and the availability of organic alternatives for
18 virtually all agricultural ingredients. With this, you have
19 the authority to remove these non-organic ingredients from the
20 National List.

21 To grow the organic market, we urge the NOSB to
22 maintain the rigor of review while supporting the expansion of
23 the agricultural sector that seeks to eliminate threats to
24 public health, threats to biodiversity and climate by putting
25 an end to a reliance on petrochemical inputs or ingredients in

1 the chain of production. The NOSB can and must do this under
2 its statutory responsibility to manage the National List.

3 Thank you so much for your service again and
4 appreciate this opportunity.

5 CHAIR BRUCH: Jay, thank you so much for your time
6 today.

7 Any questions for Jay?

8 (No response.)

9 CHAIR BRUCH: All right. I'm not seeing any. Jay,
10 thank you again for all your contributions, oral and written.

11 All right. We're going to move on to Scott Myers.
12 Then on deck, Kate Mendenhall and Noah Wendt.

13 Scott, please state your name and affiliation.

14 MR. MYERS: Hi. My name is Scott Myers, and I
15 certify my farm, Woodlyn Acres Farm, in Dalton, Ohio, with OFUN
16 Real Organic Project.

17 I serve as the Policy Committee Farmer Chair with the
18 Organic Farmers Association, and my farm is a fourth-generation
19 family farm raising organic grains and hay, over 2,500 acres,
20 in Northeastern Ohio. This will be our ninth year certified
21 organic.

22 I would like to speak about the issue of fraudulent
23 organic imports today and share a few recent experiences I've
24 had with this issue. When delivering organic grain to a buyer,
25 it's standard practice to pull a sample of grain for testing

1 during weighing. These tests are used to grade the grain as
2 well as determine if the grain delivery can be accepted or
3 rejected due to failing one of the tests. Normal tests that
4 are run include moisture and test weight, and many buyers will
5 also run a GMO test as well as a toxin test. Occasionally,
6 this sample will also be used to test for pesticide residue,
7 but not all buyers do this, and even the ones that do only send
8 a very small number of these out for testing.

9 This past fall, while delivering organic grain to a
10 buyer, my employee witnessed trucks not being probed while
11 delivering grain. Our trucks with domestically raised grain
12 were being probed and tested. He inquired as to why not
13 everyone was being tested, and they said they were unloading a
14 barge of their grain at the river so there was no need to test.

15 A few weeks later, at an event that I was attending
16 in Chicago, I made contact with a person that specializes in
17 tracking organic grain markets and prices from both buyers and
18 sellers, and I mentioned what I saw to him. His first comment
19 was that, given his recent reporting and research, the grain in
20 question was most likely coming from Argentina.

21 He and I surmised that they probably weren't testing
22 due to the fact they already owned the grain, and how would
23 they reject something they already owned, whereas my grain that
24 I was delivering on a forward contract could easily be rejected
25 if it failed one of the tests.

1 I am frequently reminded that the organic
2 certification is based on having the paperwork in order and not
3 based on testing. If this is true, then why are they testing
4 every load of my grain for GMO content? We need to change the
5 U.S. organic standards and require all high-risk feedstuffs be
6 tested.

7 At the same meeting in Chicago, we heard from an
8 exporter from Argentina. Weird coincidence, right? He
9 mentioned that there are two grades of certified organic in his
10 country, organic and NOP organic. He explained that organic is
11 shipped to the EU and NOP organic is only shipped to the U.S.
12 because they know it won't be tested for anything.

13 Recently, the Organic Imports Verification Act was
14 introduced by Senator Ricketts. I have been very fortunate to
15 get to work on developing this bill along with some other
16 organic grain farmers and multiple trade organizations
17 representing organic. While it's not perfect and will continue
18 to be refined as it makes its way through Congress, we need to
19 start somewhere to protect the integrity of the USDA organic
20 program as well as the market for domestic organic farmers.
21 Given a level playing field, I believe the U.S. organic farmers
22 can profitably compete with any country in the world growing
23 organic grains and other crops.

24 Thank you for your time and dedicated service to the
25 organic community and for the opportunity to speak today.

1 CHAIR BRUCH: Thanks, Scott, for your time today and
2 delivering those comments.

3 Any questions from the Board?

4 (No response.)

5 CHAIR BRUCH: Scott, just a quick question for you.
6 When your grain is getting tested at your buyer, how long of a
7 turnaround time for those initial tests that you described, how
8 long does that take?

9 MR. MYERS: A couple minutes at most. Usually
10 between -- they usually test while we're on the scales, and by
11 the time we pull off the scales, and there might be a line of
12 trucks, you know, at most five minutes, but usually one or two
13 minutes is all.

14 CHAIR BRUCH: Okay. Thanks for that. I see one more
15 hand.

16 Logan, go ahead.

17 BOARD MEMBER PETREY: Yeah. Which crop is more
18 frequently tested for residues?

19 MR. MYERS: In our case -- we raise actually eight
20 different grain crops -- and in our case, soybeans and corn and
21 also sunflowers are the three for us that get tested the most
22 commonly, although wheat is also tested.

23 BOARD MEMBER PETREY: Is soybeans tested more than
24 corn?

25 MR. MYERS: In our case, no. No, it's about even.

1 It depends on the buyer, whether it's a buyer that has the
2 ability to test. Some of our corn goes to small local buyers,
3 so those aren't tested.

4 BOARD MEMBER PETREY: Okay.

5 MR. MYERS: They might be going right to a farm.

6 CHAIR BRUCH: Thanks.

7 MR. MYERS: Yep.

8 CHAIR BRUCH: Thanks, Logan, for that question.

9 Thanks, Scott, for your time today. Really
10 appreciate it.

11 We will go to Kate Mendenhall next, and then
12 Noah Wendt on deck, and Karl Hammer also on deck.

13 Go ahead, Kate. Please state your name and
14 affiliation.

15 MS. MENDENHALL: Thank you, NOSB members, for the
16 opportunity to speak before you today. My name is Kate
17 Mendenhall, and I serve as the Executive Director of the
18 Organic Farmers Association, a national organization created by
19 and for organic farmers. First, I want to welcome new NOSB
20 members and Mr. Purdy to his first NOSB meeting and commend the
21 timing with Earth Day. Nice job.

22 I also express my sincere gratitude to the whole NOP
23 staff for their dedicated work building a strong organic market
24 and defending organic integrity. A fully funded and properly
25 staffed national organic program is essential to the continued

1 success of organic agriculture in the United States. We
2 appreciate your efforts to keep the NOSB process on schedule,
3 ensuring timely consideration of important issues facing our
4 organic community.

5 First, I will be speaking on risk-based
6 certification. The implementation of strengthening organic
7 enforcement was never intended to burden small, established
8 organic farmers with excessive paperwork and oversight. We
9 need clear NOP guidance that helps certifiers appropriately
10 assess risk and apply proportional verification methods.

11 Just last week, a farmer certified organic since 1989
12 contacted me to tell me that they had received an unannounced
13 spot inspection. This is a small farm selling locally and is
14 unequivocally low risk for marketplace fraud. Furthermore,
15 they have maintained nearly perfect inspection records every
16 year. Why would a certifier spend valuable resources on a
17 surprise inspection for this farm? The system is off-kilter,
18 and small farms are overburdened. A risk-based approach would
19 clearly focus additional resources on high-risk operations.

20 Regarding residue testing, OFA appreciates the
21 Board's work on this topic and supports targeted testing for
22 high-risk product loads, especially those coming from regions
23 where NOP oversight may be less stringent. This would help
24 ensure domestic producers compete in an equitable market under
25 uniform standards. However, residue testing should remain a

1 verification tool, not the primary focus as organic remains a
2 production-based system.

3 Finally, we urge the Board to continue reviewing all
4 materials separately during sunset reviews. Each substance
5 deserves thorough examination and opportunity for meaningful
6 discussion by the organic community. Combining materials under
7 a consent agenda would sacrifice transparency and could cause
8 challenges in subsequent reviews. This would limit public
9 input on decisions that directly impact organic farmers' daily
10 operations.

11 Organic Farmers Association was created by farmers
12 for farmers. Without domestic organic farmers, we simply don't
13 have an organic market. As you make decisions this week,
14 please keep organic farmer stakeholders at the forefront of
15 your thinking. You will be hearing from quite a number of them
16 today and on Thursday. Thank you for your time and for your
17 service.

18 CHAIR BRUCH: Excellent. Thank you so much, Kate. I
19 appreciate your comments today.

20 Any questions for Kate? I see one.

21 Go ahead, Nate.

22 SECRETARY LEWIS: Hey, Kate. Thanks for being on.
23 I would like to, if it's possible, de-package your all's
24 comments on paper. Are you the right person to talk to about
25 that, or should I wait until another commenter?

1 MS. MENDENHALL: No, well, I can take a stab, but
2 Harriet is testifying on Thursday, and she may be able to give
3 you more insight.

4 SECRETARY LEWIS: All right. No, that's helpful.
5 Yeah, I'm just trying to sort of, yeah, like I said, unpackage
6 all this stuff, because my reading of your comments is that you
7 would like to either see the elimination or at least the
8 further annotation of paper used in compost, which I think is
9 certainly on the table, particularly with our compost work
10 stream.

11 But you are currently in support of the paper pots
12 listing, and so I think what I'm trying to untangle is why do
13 we support paper pots but want to see a reform or elimination
14 of paper in compost? So if you could talk a little bit on that
15 thinking, that would be really helpful.

16 MS. MENDENHALL: Well, I think we want to look at
17 paper, again, knowing that the composition of paper has
18 changed. And so I know that the composition of the paper pots
19 was part of that discussion to find out is it really paper or
20 are there other things in there? So I think, you know, first
21 you start with paper, and then you have to look at paper pots
22 and make sure it's in the same compliance thinking.

23 I don't think Organic Farmers Association is
24 advocating for two different avenues there, but because time
25 has passed since paper was first reviewed, and that's what we

1 were using when we were determining paper pots, perhaps since
2 the composition has changed since the last paper review it's
3 time to look at it again, and then that would affect other
4 things that are tied to it.

5 SECRETARY LEWIS: Okay. That's helpful. So, you
6 know, I mean, and obviously the devil's in the details here,
7 but if the Board were to propose some sort of restriction
8 related to paper used in compost that has some alignment with
9 paper pots, that would be something worth considering. I'm not
10 asking you to get support behind it before you see something,
11 but I'm just trying to sort of figure out how to navigate this
12 so that we're, you know, thinking about all the risks out here.

13 MS. MENDENHALL: Yeah, I think, you know, that's part
14 of the Board's role, right, to like assess the situation,
15 identify other things that come up, and then ask for public
16 comment on that. Paper pots, I know, is a really important
17 issue to small producers, and so we would continue to advocate
18 for that technology, but we also want it to be in line with
19 consumer expectations and appropriate materials in our soil.

20 SECRETARY LEWIS: Okay. great. Thanks so much. I
21 appreciate it.

22 CHAIR BRUCH: Thanks for that question, Nate.

23 Any other questions for Kate?

24 (No response.)

25 CHAIR BRUCH: All right. Not seeing any.

1 Thank you, Kate, so much for the work you do, as well
2 as Organic Farmers Association. Really appreciate it.

3 All right. Next we have Noah Wendt, then
4 Karl Hammer, and then Harold Austin.

5 So, Noah Wendt, please state your name and
6 affiliation.

7 MR. WENDT: Okay. Can you hear me? Okay. Noah
8 Wendt. I'm a member of the Organic Farmers Association, and
9 also farm here in Central Iowa. I want to thank all the
10 members of the National Organic Standards Board for hearing
11 farmer and related ag professional voices at your meetings,
12 whether virtually or in person. I feel that continuing to have
13 both in person and virtual is great and your commitment to
14 inclusivity is appreciated.

15 I'm a member of the Organic Farmers Association on
16 the OFA Crop Insurance Working Group and the NOSB Working
17 Group. I'm also on the Board of Directors for the Iowa Organic
18 Association. I farm organic crops in central Iowa, and in 2015
19 our farm started to aggressively transition to organic. Since
20 2015, we've transitioned about 1,400 of our 2,600 acres to
21 organic. Our passion for caring for the land and providing a
22 safe food supply continues to be the driving force. We also
23 operated an organic elevator from 2022 to 2023 near Des Moines,
24 Iowa. Crops that we grow are organic crops, corn, soybeans,
25 sunflowers, oats, wheat, kernza, and field peas.

1 Throughout the years of our organic production and
2 operating the organic grain elevator, we realized a lack of
3 interest in our product due to cheap imports, and I'm here
4 speaking in regards to that, much like Scott had earlier. This
5 has become the driving force to lower organic commodity prices
6 at the farm level, thus reducing our farm income to a point
7 that it has become devastating to several organic farm
8 operations.

9 Upon seeing research that has been performed to help
10 support the Organic Import Verification Act, we have become
11 fully convinced that fraudulent organic imports are the likely
12 suspect for most of the lower prices for organic crops. While
13 we believe the SOE will provide some help, we also feel like
14 there's a strong need for the OBIA -- OIVA to provide an
15 additional and extremely important layer of protection to the
16 organic industry in the U.S. Residue testing at the port is a
17 key part of the Act, and it will help provide an extra layer of
18 protection that organic consumers need also.

19 As organic producers, we're held to a high standard
20 here domestically, and we feel like this should be the case for
21 anything that is imported also. One example that I have is
22 recently, with the Trump administration tariffs, we've seen
23 soybean prices begin to creep up recently, and I'm not here to
24 support or not support tariffs, but I feel this is a testament
25 of what could happen to domestic organic prices if the Act was

1 implemented and residue testing was implemented. That would
2 help our bottom line here in the U.S. as domestic producers.

3 There's a significant investment into transitioning
4 to organic. The TOPP program has done a great job helping with
5 that transition, and we just need a little bit more help to
6 keep pushing us over the edge.

7 Thank you for your time today.

8 CHAIR BRUCH: Thanks, Noah. I really appreciate you
9 calling in in your mobile office today.

10 Any questions for Noah?

11 (No response.)

12 CHAIR BRUCH: Not seeing any questions from the
13 Board, Noah. One general question, you mentioned price. Can
14 you just make some comments on how you are aligning your farm
15 for efficiencies when we're looking at trying to have a cost-
16 win delivered product, you know, just the different
17 efficiencies that you're able to drive into your farm and how
18 that trajectory has been over the years?

19 MR. WENDT: Certainly some of the efficiency that
20 we're trying to drive is to increase yield just to help out
21 that bottom line as far as break-evens go, but also adding
22 diversity to the mixture. That's certainly been a challenge as
23 of recent because just not being able to insure all the crops -
24 - and that's a whole other subject I could get on -- but that
25 has really driven us towards more of the traditional crops

1 here, especially for 2025, that is going to help make our farm
2 more efficient from a financial standpoint.

3 CHAIR BRUCH: Thanks so much, Noah. Really
4 appreciate your time today, and best wishes this production
5 season.

6 MR. WENDT: Thanks.

7 CHAIR BRUCH: All right. Yes, we have Karl Hammer
8 next, and then Harold Austin and Bill Wolf.

9 Karl, please state your name and affiliation.

10 MR. HAMMER: Hello. My name is Karl Hammer. I
11 operate a farm compost business in Montpelier, Vermont called
12 the Vermont Compost Company, which incorporated in May of 1993.
13 Our farm collects food scraps in our community and blends them
14 with cattle and equine manures and other suitable farm, forest,
15 and community residuals. The blended materials are provided as
16 forage feed to a free-range flock of egg-laying hens on the way
17 to being composted in a turned windrow system.

18 No supplemental feed other than pasture is regularly
19 provided to the birds. We have produced eggs for sale every
20 day since 1998 by this method. Most of the compost produced is
21 utilized to produce a product line of compost-based soil
22 amendments, seeding, potting, and bed-filling mixes, most of
23 which are sold to organic growers.

24 Hello, am I -- I'm not hearing but me. Am I muted?

25 CHAIR BRUCH: Nope, Carl, we can hear you.

1 MR. HAMMER: Okay. I don't know when I'm -- when I
2 launch into my intro. That was my intro I guess, then, about
3 who I am.

4 CHAIR BRUCH: Okay. Well, thank you. We actually
5 started the clock.

6 MR. HAMMER: Oh, okay. All right.

7 CHAIR BRUCH: So I apologize for that.

8 MR. HAMMER: Yep.

9 CHAIR BRUCH: Yep. It looks like there's about two
10 minutes and ten seconds left.

11 MR. HAMMER: All right. Here I go.

12 Our compost and compost-based blended products are
13 certified to be acceptable for use in certified organic
14 production by the Vermont Organic Farmers, VOF. We take very
15 seriously our responsibility to protect the organic
16 certification and intentions of our customers by strict
17 compliance to the NOP rule through our process controls. We
18 therefore never willingly accept any form of bioplastic for
19 composting, and we remove accidental bioplastic inclusions when
20 we see them.

21 The NOP rule requires good faith effort to prohibit
22 and prevent inclusion of plastics in compost process, and to
23 remove accidental inclusions. As we inspect inbound feedstocks
24 and remove all visible plastic, we are not practically able to
25 distinguish between compostable and non-compostable plastics,

1 and must remove all.

2 We struggle with many forms of accidental plastic
3 inclusions, but the single most challenging item is the
4 ubiquitous PLU produce sticker. If acceptable compostable
5 plastics were to be very distinct in form from non-compostable
6 plastics, i.e., all PLU stickers are mandated to be produced
7 from acceptable compostable feedstocks, then perhaps we could
8 accommodate utilizing them. Bags -- compostable or not --
9 often hide contaminants, and we do not accept bagged materials,
10 food scraps or other. We open and empty bags when they are
11 incidentally deposited, and dispose of the bags.

12 While the promise of truly benign and compostable
13 plastic products is very appealing, the current state of the
14 art supports a skeptical view about the plant and soil system
15 impacts and toxicity of the residual materials. Bioplastics
16 contain potentially hundreds of plasticizer compounds which
17 impart the specific personality of the different formulations.
18 These formulas are almost always proprietary and subject to
19 changes of formulation.

20 Future research and enforcement will require full
21 transparency about formulations. We do not support allowing
22 compostable plastics to bypass the standard NOP process for
23 listing allowed synthetic materials. We believe customers
24 would overwhelmingly prefer that we not allow compostable
25 plastic, even if sanctioned by the NOP.

1 CHAIR BRUCH: Thank you, Karl. I apologize for
2 interrupting and the confusion on the front end. I really
3 appreciate your comments and chiming in here.
4 I want to make sure we have some time for questions for you.

5 Are there any questions from Board members?

6 Nate has one. Go ahead, Nate.

7 SECRETARY LEWIS: Yeah, I just wanted to make sure I
8 was clear at the very end. What I heard was that you all
9 support if compostables were to be allowed using the National
10 List process and the Board review process that we're currently
11 engaged in. Is that --

12 Mr. HAMMER: Well, as I say, the appeal of the -- you
13 know, there are some materials like PLU stickers in particular
14 which, while we forbid them and we do grab them when we see
15 them, we understand that we are not being completely effective
16 at eliminating them. Okay? So, and because of our
17 increasingly emerging concern about the impact of micro and
18 nanoplastics on the whole soil, food, animal system, human, we
19 are concerned that these materials may also have impacts that
20 are as yet unclear, that are negative.

21 And, but that said, yes, as a mitigative strategy,
22 were they properly vetted and were there -- to our point of
23 view -- truly enforceable transparencies about formulation, I
24 would not oppose them being allowed in organic. I don't know
25 that we would allow them.

1 I know that I have customers who would certainly
2 prefer that we not allow them, and so we have not as an
3 enterprise decided how we will respond. And, you know, it
4 would have to be -- from a practical point of view -- it would
5 have to be every PLU sticker out there. It could not be --
6 because we wouldn't be able to tell the difference.

7 SECRETARY LEWIS: Fair enough. Thank you so much for
8 your measured approach on this. I appreciate it.

9 CHAIR BRUCH: Thank you so much, Karl, for engaging
10 in our process. Really appreciate your comments today.

11 Any other questions for Carl?

12 (No response.)

13 CHAIR BRUCH: Okay. Not seeing any. Have a
14 wonderful day.

15 MR. HAMMER: Thank you.

16 CHAIR BRUCH: And, yes, we're moving on to
17 Harold Austin. Then on deck, Bill Wolf and Dan Langager.

18 Harold, please state your name and affiliation. And
19 we can't hear you there, Harold. I'm sure I'll do that a
20 couple times before the day is done. Nope, not yet. Still not
21 hearing anything.

22 MR. AUSTIN: Anything now?

23 CHAIR BRUCH: Oh, yeah.

24 MR. AUSTIN: All right.

25 MS. COSLOY: Got a winner. Okay.

1 MR. AUSTIN: You've got to hit the magic button.

2 All right. Good morning, everybody. My name is
3 Harold Austin, and I'm a former member of the NOSB, and
4 currently serve as the Chair of the Northwest Horticultural
5 Council Science Advisory Committee, as well as its Organic
6 Subcommittee. I'm also a member of the Governing Council for
7 the Coalition for Organic and Regenerative Agriculture, better
8 known as CORA. Please refer to my written comments and those
9 of the Horticultural Council's for a further detailed set of
10 comments.

11 For Crops, I would like to state my support for the
12 petition to add Pear Ester to the National List for use in
13 organic crop production. This is one of the inerts used in our
14 mating disruption process in the passive pheromone dispensers
15 that we use, our primary control and monitoring tool for
16 codling moth and apple and pear production. I would also like
17 to ask you to read the list, or keep on the list, the EPA list
18 for inerts as we wait for the NOP to present us with the new
19 guidelines for how to deal with both List 3 and List 4 inerts
20 as we look forward and move ahead.

21 In handling, I support the continued allowance for
22 the use of ozone in organic handling and processing. I can't
23 stress enough the importance of this material in our organic
24 storage regime. First, when it's used at 70 parts per billion
25 to assist us in the control of storage rots, mold, and decay,

1 and then after the packing season -- when our storages are
2 empty -- at a higher rate to help to control the food pathogens
3 or food safety concerns.

4 This involves a process that includes a highly
5 complex system designed for application, monitoring, and
6 warnings. Our technicians are highly trained and very skilled
7 at what they do. This material is also a vital component in
8 our packing house for pathogen control and food safety.

9 For the PDS subcommittee, I support the committee's
10 discussion document on sunset review efficiency, but I would
11 suggest -- make two suggestions. One, for the sake of
12 transparency, I would suggest that when you post the documents
13 for the fall meeting, that prior to the opening of public
14 comment period, that you would include the materials that would
15 be considered to be listed on the consent agenda-- just for the
16 sake of transparency -- if possible.

17 And then I would also include a backup resolution,
18 which we used multiple times when I was on the Board, so that
19 if for some crazy reason the vote does not go as you thought it
20 would, you could recall the consent agenda motion and then vote
21 on each material individually so that materials don't
22 inadvertently get voted off. Provide yourselves with a safety
23 off-ramp.

24 And then finally, one statement -- and this statement
25 is strictly on behalf of myself and not for anybody that I'm

1 affiliated with -- but I would urge the NOSB and the NOP to
2 stress the need to each member of the NOSB of the importance of
3 fulfilling their responsibilities, as they agreed to prior to
4 being appointed to the NOSB, and of the time commitment that it
5 will take to serve in their appointed seat.

6 Each member has a responsibility to serve the organic
7 community and especially the stakeholders for that seat that
8 they have been appointed to. Any member not living up to that
9 commitment that they have agreed to before accepting that
10 position should resign their position or be asked to again be
11 removed. For a lack of representing, a lack of integrity and
12 responsibility, do it for the stakeholders that you're supposed
13 to represent. Thank you.

14 CHAIR BRUCH: All right. Thank you, Harold. Really
15 appreciate your time today.

16 Any questions for Harold?

17 (No response.)

18 CHAIR BRUCH: Harold, I have one. You mentioned pear
19 Esther.

20 MR. AUSTIN: Yes.

21 CHAIR BRUCH: I wanted to get your take on just some
22 additional comments we've heard coming in from written
23 commenters about delivery mechanisms. Some commenters were in
24 favor of Pear Ester potentially in a monitoring device or trap,
25 but maybe not necessarily in favor of a delivery mechanism full

1 yearly, just due to maybe how it would be contained -- that
2 micro-encapsulated alumite. Can you just comment on your
3 thoughts on that?

4 MR. AUSTIN: Yeah. So we farm thousands of acres of
5 tree fruit organically, and the way that we're using the Pear
6 Ester in our mating disruption is it's in dispensers. And
7 these dispensers are like a rubberized silicone-type material
8 that allows -- or a twist tie like you see on a loaf of bread
9 -- and it allows for the pheromone to be released into the air.

10 It's very minuscule. Especially for the Pear Ester
11 that we're talking about, it's simply an inert. It's not the
12 codlemone. The codlemone is the attractive scent of the female
13 that gets infused into this along with this inert material.

14 So these are hung on our trellis wires or on a limb.
15 It's not -- at least how we're using it -- we're not broadcast
16 spraying this. So the actual amount of the material that's
17 getting dispersed up into the air out in our blocks is
18 extremely minuscule. So I wouldn't see a concern with it. I
19 know there are some uses where there are some of these
20 materials that are sprayed. But for the majority of the tree
21 fruit industry and the pear industry, we're using the twist
22 ties or the other types.

23 The other thing that we do is we use that rubber
24 dispenser inside a trap with a sticky substance in it to use
25 that attracts the codling moth in there so that we can monitor

1 and detect what our populations are. So that way we can tell
2 what the strength of the incoming population into our blocks
3 are and help that gauge when it's properly time to spray or put
4 on, whether we're using a granulosis virus or we're using one
5 of the other sprays.

6 But the mating disruption is our number one defense
7 against codling moth. We use these. It confuses. The moths
8 can't mate because they're confused. The males can't find the
9 females and vice versa. And so it really reduces the need on
10 the other materials for us, takes the pressure off.

11 But even in our conventional farms we're really
12 beginning to struggle with resistance buildup to the materials
13 that are being used on the codling moth, so there's a lot of
14 actual sterilized moths being released as well. So, but this
15 is part of our monitoring but also part of the main building
16 block of the pheromones, our mating disruption, and our codling
17 moth control.

18 CHAIR BRUCH: Excellent. Thank you, Harold.
19 Appreciate that.

20 MR. AUSTIN: You're welcome.

21 CHAIR BRUCH: Nate, we have time for another quick
22 question here.

23 SECRETARY LEWIS: Yeah, thanks, Harold. I'm curious
24 if -- in your work with CORA and your non-tree fruit farming
25 partners out there in the basin -- if there's any statement

1 you'd like to make about the ethylene for spuds and onions. I
2 don't know if there's been any discussion about that.

3 MR. AUSTIN: Sure. Yeah, and that goes back to not
4 only CORA, but it goes back to my time on the Advisory Board
5 for the Washington State Department of Ags program as well.

6 We have a lot of organic spuds and potatoes grown in
7 Washington State and in Idaho and our neighboring states. But
8 it's important. It will provide a big opportunity for them.
9 It's already allowed for two other uses on the National List,
10 so this would just be slightly expanding that use, but it would
11 be huge for those people that have the storages for onions and
12 potatoes. It would help carry them farther into the market,
13 but it would also help control the problems that they run into
14 with these things sprouting on them and then making them non-
15 commercially ready to be able to be sold.

16 I would also suggest along that line, as we use
17 ethylene to pre-ripen bananas, at some point in time I think it
18 would behoove our industry to allow that same use pattern to be
19 used to pre-ripen pears. We cannot do that in organics where
20 we can in conventional, and that would also help improve and I
21 think increase the amount of organic pears that would be able
22 to be marketed as well.

23 CHAIR BRUCH: Excellent. Thank you, Harold.

24 MR. AUSTIN: You're welcome.

25 CHAIR BRUCH: Really appreciate your time today.

1 We're going to move to our next speaker. We have
2 Bill Wolfe, followed by Dan Langager, and then we have a break.

3 So, Bill Wolf, please state your name and
4 affiliation.

5 MR. WOLF: Can you all hear me?

6 CHAIR BRUCH: Yes, loud and clear.

7 MR. WOLF: Great. I'm Bill Wolf, CEO of Wolf and
8 Associates and Second Star Farm, and past president of both
9 OMRI and OTA. Thanks to the NOSB for your service, with a
10 special shout-out to the five new volunteer members.

11 Slide two.

12 For over 50 years, earthworms have been my teacher,
13 observing what they prefer. That passion led me to help
14 hundreds of organic growers and handlers, and even to speak at
15 the very first NOSB meeting in 2002 and most of them since.

16 slide three.

17 Our earthworm-friendly written comments are en route.
18 We endorse the CACC residue testing proposal and, of course,
19 keeping the National List toolbox strong. Today, however, I
20 will highlight existential threats to organic, and actions that
21 you can take.

22 slide four.

23 U.S. organic farmers are still getting hammered by
24 imports. U.S. sales of organic is \$70 billion -- almost half
25 of all global sales -- but only 3 percent of acreage in the

1 U.S. The good news is the gap is starting to shrink, with a 3
2 million acre increase from the 2021 figures presented to you a
3 year ago.

4 slide five.

5 This chart shows the steady growth of U.S. organic
6 sales versus the lack of growth of certified organic acreage in
7 the U.S. Again, no good news, an uptake in U.S. production in
8 the last two years. We need to keep that momentum going.

9 slide six.

10 But there are new threats to organic that we must
11 address. Strengthening organic enforcement is wonderful, but
12 it's adding more work for U.S. organic farmers that isn't all
13 necessary. Plus, tariffs will disrupt the supply chains -- and
14 most ominous -- cuts to USDA funding and staff are literally
15 gale force headwinds that we now face.

16 slide seven.

17 So we must respond to these threats. I ask that you
18 report to the Secretary that support for all U.S. organic
19 initiatives is a vital part of the farmer-forward USDA. We can
20 reassure organic production by funding transition and organic
21 market development. We also need to make it less burdensome
22 for farmers to be certified. With more efficient systems, a
23 small such step will be a common OSP.

24 slide eight.

25 Let's keep the momentum going to increase U.S.

1 organic acreage. It's high time. We've made a lot of
2 progress. Organic improves carbon sequestration, healthier
3 soil, people, and planet.

4 I'd be happy to answer any questions. Thank you.

5 CHAIR BRUCH: Thank you, Bill, so much for your
6 comments today.

7 Any questions for Bill?

8 (No response.)

9 CHAIR BRUCH: All right. Bill, not seeing any. Take
10 care. Thanks for those comments again. Really appreciate it.

11 MR. WOLF: Thank you.

12 CHAIR BRUCH: All right. We have Dan Langager next,
13 and then we're going to jump to a break.

14 Dan?

15 MR. LANGAGER: Can you hear me?

16 CHAIR BRUCH: Yes. Please state your name and
17 affiliation.

18 MR. LANGAGER: Great. Thank you.

19 Hello, NOSB members, and a very Happy Earth Day to
20 you all. My name is Dan Langager, and I manage organic policy
21 at the Northwest Horticultural Council. The NHC represents the
22 growers, packers, and shippers of apples, pears, and sweet
23 cherries here in the Pacific Northwest, who produce the
24 majority of our country's organic pome fruit.

25 I want to start by welcoming the five new members to

1 the Board. Your willingness to serve and volunteer your time
2 and energy is much appreciated by the organic community. And
3 thank you as well to the other nine members for your continuing
4 hard work.

5 Organic tree fruit growers are anxiously awaiting the
6 Board's decision on the Pear Ester petition and strongly
7 support its addition to the National List. Growers consider
8 these Pear Ester-based products as the most effective for
9 coddling moth monitoring and mating disruption. Pear ester
10 aligns with the principles and goals of organics by decreasing
11 insecticide sprays, as these tools allow growers to pinpoint
12 hot spots of coddling moth populations and then deploy measures
13 only when and where most needed, often treating as little as 10
14 percent of an orchard and achieving good control of coddling
15 moth.

16 Please refer to our extensive written comments on
17 Pear Ester for more information about its chemical structure,
18 how it's used by organic growers, and why it is such a critical
19 tool in mating disruption and integrated pest management.

20 For the materials under sunset review, tree fruit
21 producers and handlers support the continued listing of
22 potassium hypochlorite, ammonium carbonate, vitamin D3, aquatic
23 plant extracts, lignin sulfonate, paper-based planting aids,
24 insecticidal soaps and soap-based algaecides, the EPA list for
25 inerts, kaolin, ozone, carnauba wax, and sodium silicate.

1 Sodium silicate is still an essential tool for small
2 pear producers and packers as a floating agent. The loss of
3 sodium silicate would directly affect small-sized operations as
4 mechanization is the only alternative, and small growers simply
5 do not have the capital to upgrade to new, expensive equipment.
6 Pear grower returns have not increased much over the last two
7 decades, and so limiting expenses is crucial to survival. We
8 recognize sodium silicate is not used by a majority of pear
9 handlers, but it is essential for those whose packing systems
10 still depend on it.

11 And finally, the NHC generally supports the PDS
12 initiative to increase efficiency in the sunset review process.
13 The options under consideration should streamline the time and
14 efforts of the Board while retaining your ability to vote
15 individually on materials if warranted. But voting by consent
16 agendas acknowledges the perpetual importance of certain
17 materials to organic production and recognizes their consistent
18 support from organic stakeholder. Transparency will be key
19 through the process, and the Board should be cautious about any
20 unintended consequences, but it is a worthy endeavor.

21 And in closing, just again, a big thank you to the
22 Board and all of the NOP staff. We appreciate all of your
23 efforts, and thanks again for this opportunity to provide
24 feedback from organic tree fruit growers and packers directly
25 to the NOSB.

1 CHAIR BRUCH: Dan, thank you so much. I apologize
2 for mispronouncing your last name. Thank you so much.

3 Any questions for Dan?

4 (No response.)

5 CHAIR BRUCH: All right. Dan, I'm not seeing any.
6 So we will go to our first scheduled break here. Thank you
7 again. Appreciate it.

8 We are going to return back at 5 till the top of the
9 hour, And our NOP support team will plan on updating the slide.
10 Thank you so much. I see it here. And then when we return,
11 we're going to start off with Elizabeth Bell, then Max Sano,
12 and then Philip LaRocca. Thank you. See you shortly.

13 ELECTRONIC VOICE: Recording stopped.

14 (Whereupon, at 1:42 p.m., a lunch recess was taken.)

15 ELECTRONIC VOICE: Recording in progress.

16 CHAIR BRUCH: All right. Welcome back, everybody.
17 We'll get things started again. Elizabeth Bell is on right on
18 time, and then next on deck is Max Sano and then Philip
19 LaRocca.

20 So, Elizabeth, why don't you kick us off? Please
21 state your name and affiliation.

22 MS. BELL: Thank you, Amy. And Happy Earth Day,
23 everyone. My name is Liz Bell, and I represent CROPP
24 Cooperative/Organic Valley. Thank you to the NOP and the Board
25 for giving me this opportunity today to provide comments on

1 behalf of our co-op, and thank you for your service. I look to
2 advocate for and consult our 1,600 farmer member owners on
3 their organic and open seed certifications.

4 Meloxicam. We strongly encourage the NOP to continue
5 the momentum on the addition of Meloxicam to the National List.
6 In 2023 we submitted the petition to add it. And at the fall
7 2024 meeting, Board members voted in support of it and
8 submitted their recommendation to the NOP. Thank you again to
9 the Board for working so diligently to move this through the
10 NOSB process. This is the right thing to do for animals and
11 our industry. I ask for the NOP, please make haste on
12 Meloxicam.

13 Iodine. CROPP supports the proposed annotation
14 change to prohibit NPE in iodine. Our dairy policy already
15 prohibits NPEs, and sourcing compliant products has not been an
16 issue. It should be noted, since the scope of this
17 conversation has largely focused on teat tips and cleaning
18 products, there appear to be a handful of iodine products that
19 are currently approved by certifiers for use mainly as navel
20 dips or wound care that do contain NPEs. These are generally
21 iodine sprays, and the change would subsequently impact their
22 approval of these often overlooked products. There are ample
23 NPE-free alternatives out there, but I just wanted to highlight
24 it.

25 Risk-based certification. CROPP supports this

1 proposal and its purpose to reduce the significant
2 certification burdens on low-risk operations while maintaining
3 appropriate scrutiny for high-risk operations, all in the
4 spirit of promoting organic integrity and reducing fraud in the
5 marketplace. We support the idea of developing a standardized
6 risk criteria and an oversight activities process matrix. The
7 ACA's risk scorecard template is a useful tool, and we suggest
8 some amendments to that which I'll expand further on in the
9 written comments which are forthcoming.

10 Our average dairy producer milks about 75 cows, has
11 less than \$500,000 in annual gross sales, and only produces
12 organic. They generally do not import or export products
13 directly and do not handle products outside of collecting raw
14 milk to a bulk tank and mixing feed for their herd. In the
15 grand scheme of organic, I'd call that pretty low risk.

16 Notably, in the last two years, our producers have
17 seen a major increase in the burdens of certification,
18 including more recordkeeping, length of inspections, and cost
19 of certification. I also hear similar difficulties from
20 certification agencies, and recognize a risk-based approach and
21 better NOP guidance would help both operations and certifiers
22 make more consistent and well-informed decisions. One thing
23 our dairy producers often comment on is the surprising
24 frequency of inspections that occur in the non-grazing season,
25 even in consecutive years.

1 If this proposal moves forward, we encourage this
2 process to implement an inspection timing requirement. For
3 example, this could be a grazing season inspection with actual
4 pasture observations and more thorough auditing of GMI and
5 grazing requirements every three years at minimum. We also
6 support a creation of a common OSP which would improve
7 consistency for operations and certifiers, especially when
8 they're switching.

9 Thank you.

10 CHAIR BRUCH: Thank you, Liz. Really appreciate your
11 time today.

12 Any questions from the Board for Liz? I see Nate's
13 hand up.

14 Go ahead, Nate.

15 SECRETARY LEWIS: Thanks, Liz. Appreciate your
16 comments and Organic Valley's contributions to the industry
17 writ large.

18 On the iodine and the nonylphenol ethoxylates issue,
19 just a reminder, we tried a proposal with a broader annotation
20 in the fall, alkylphenol ethoxylates. We're seeing again this
21 spring as nonylphenol ethoxylates, which is one of those types.
22 So my question is has Organic Valley ever seen an iodine teat
23 dip especially with an alkylphenol ethoxylate that is not
24 nonylphenol ethoxylate? Does that make sense? Did I get
25 through?

1 MS. BELL: It does make sense. I will not be using
2 the full terms because I will just butcher that. You did a
3 great job.

4 In terms of our experience, we have not seen any
5 iodine formulations in those teat dips with any of those APES
6 outside of NPES. So just NPES that we've seen in the
7 formulations, nothing else. So I think that could be a
8 question possibly for someone in material review organization
9 if it hasn't already been posed. I imagine it has, but that's
10 not something that we have seen in our experience.

11 SECRETARY LEWIS: Okay. Tremendously helpful. Thank
12 you so much.

13 MS. BELL: Mm-hmm.

14 CHAIR BRUCH: Liz, thank you for that response.

15 Are there any other questions for Liz from the Board?

16 (No response.)

17 All right. Really appreciate your time here today
18 and all of the contributions you make to our community. Thank
19 you.

20 All right. We have up Max Sano, then Philip LaRocca,
21 followed by Lauren Pope.

22 Max, please state your name and affiliation.

23 MR. SANO: Good afternoon. My name is Max Sano, and
24 I'm the Senior Policy and Coalitions Associate at Beyond
25 Pesticides. I want to thank the NOSB for facilitating this

1 spring 2025 meeting to continue strengthening organic
2 standards. Specifically, I would like to discuss the proposals
3 on the docket for the CACS subcommittee for risk-based
4 certification and residue testing.

5 On the issue of risk-based certification, we would
6 like to give kudos to the Board for recognizing that balance
7 between adaptability and transparency is key to preserving
8 integrity, and leaning into the belief that organic
9 certification is not meaningless. Ensuring strict definitions
10 and standards while recognizing the need for some flexibility
11 is necessary to increase consumer confidence in the organic
12 label.

13 Given the flexibility and prioritization in a risk-
14 based approach, we would urge the guidance on this be
15 periodically revisited by mandating an expiration date under
16 which the Board would make an affirmative decision to retain or
17 adjust the certification process. The implementation of new
18 policy for the organic supply chain, especially for a
19 multifaceted addition to an already nuanced system, should be
20 reevaluated no later than five years after the risk-based
21 certification system goes into effect.

22 On the issue of residue testing, we would also like
23 to thank the NOSB for moving forward with providing certifiers
24 additional tools to ensure compliance with organic standards.
25 In doing so, we would like to emphasize that this proposed new

1 element would improve rather than take the place of organic
2 systems plans on which the certification system is built.

3 That being said, we would recommend that the National
4 Organic Program is required to report to EPA's Office of
5 Enforcement and Compliance Assurance residue violations that
6 disqualify an organic crop from certification, be it as a
7 result of pesticide drift or runoff. Organic farmers should
8 not have to bear the brunt on a continuing basis of pesticide
9 use violations that threaten organic certification and the
10 farmer's economic viability.

11 Pertaining to minor crops, we also urge the Board to
12 not only refer to minor crops with a clear definition that
13 rejects EPA's allowance based on the chemical industry's,
14 quote, economic incentive to support a pesticide registration,
15 end quote, given that USDA identifies 11 million combined acres
16 of minor crops are grown annually in the U.S., including
17 commonly consumed fruits and vegetables, which represent
18 42 percent of national crop sales but can be a higher
19 proportion in certain states.

20 Thank you again for the opportunity to participate in
21 this public comment process. The participatory process for
22 national organic standards serves as a reminder of the
23 consequential role of the National Organic Program and the
24 Board in boosting the trust in the U.S. food system and
25 imagining a different form of agriculture that feeds the soil

1 and the people.

2 Thank you for the opportunity to speak today.

3 CHAIR BRUCH: Thank you, Max. I really appreciate
4 your time.

5 Question -- I see Kyla's hand.

6 BOARD MEMBER SMITH: Sorry, I couldn't get to my Zoom
7 hand fast enough.

8 CHAIR BRUCH: No problem. I see it.

9 BOARD MEMBER SMITH: Can you restate the part about
10 NOP or certifiers or whomever notifying EPA of violations? Can
11 you just restate? I think I caught -- or like, you know, we're
12 picking up what you were laying down, but can you just restate
13 it? Thank you.

14 MR. SANO: Sorry, I was having difficulty with
15 unmuting.

16 I can reiterate our statement. We recommend the
17 program be required to report to EPA's Office of Enforcement
18 and Compliance Assurance -- They're the body that oversees
19 residue violations -- to have the National Organic Program
20 report those residue violations that would disqualify an
21 organic crop from certification as a result of pesticide drift
22 or runoff. It's a suggestion that we wanted to raise for the
23 Board's consideration. And if there's more questions on that,
24 can follow up as well.

25 BOARD MEMBER SMITH: Yeah. Okay. So I just wanted

1 to -- currently certifiers are required to report to EPA when
2 there is no EPA tolerance for the crop and the substances found
3 on that crop where there is no EPA tolerance. We're also
4 required to report when there is a detection above the EPA, and
5 so where there is no reporting is when there is a violation at
6 like 5 percent EPA tolerance, and so that's a gap that you're
7 requesting to be filled. Am I understanding that correctly?

8 MR. SANO: I wouldn't necessarily restrict it to just
9 that specific gap as there might be other gaps in the process
10 that I can't speak to right now. But I do want to reiterate
11 that that would be the goal of establishing this recommendation
12 to make sure that there's that clear interagency communication.
13 But if there's more specific questions, I can make sure to
14 circle back internally to offer additional clarity.

15 BOARD MEMBER SMITH: Okay. Yeah, it seems like right
16 now the instruction to certifiers is to report when there seems
17 to be a violation of EPA, like of the use regarding EPA
18 requirements, right? But there's not a reporting to EPA when
19 it's just the organic requirement that is in violation, but the
20 operation is not violating an EPA rule. Does that make sense?

21 And so it seems like what is being requested is to
22 also be just notifying EPA, hey, there is this other thing
23 which may not be in violation of an EPA requirement but is a
24 violation of an organic requirement that is like tied to the
25 EPA part. So I just wanted to like unpack that. Thank you.

1 CHAIR BRUCH: Thanks, Kyla.

2 Brian --

3 BOARD MEMBER CALDWELL: Yeah.

4 CHAIR BRUCH: I'm going to ask this exchange to be
5 real succinct here. Thank you.

6 BOARD MEMBER CALDWELL: I was going to say the same
7 thing.

8 Max, just very quickly, just to get the idea of the
9 thrust behind that, are you feeling like that information could
10 be used to show how great the enforcement is, or are you
11 feeling like it is to point out that organic producers are
12 bearing the brunt of drift from other operations? Or is there
13 some other reason?

14 MR. SANO: I don't want to speak unilaterally, but I
15 can imagine that it would be helpful for both of those
16 instances that you mentioned.

17 CHAIR BRUCH: All right. I appreciate it.

18 Any other follow-up questions for Max here from the
19 Board?

20 Okay. Max, I appreciate you unpackaging that item
21 for us a little bit more, and thank you for your time today and
22 Beyond Pesticides.

23 All right. We have Philip LaRocca, followed by
24 Lauren Pope, and then Colehour Bondera.

25 Philip, please state your name and affiliation.

1 MR. LARocca: My name is Phil LaRocca, and I am the
2 owner/winemaker of LaRocca Vineyards. I also sit on the
3 California Organic Product Advisory Board, and I am the
4 Chairman of the Board for CCOF. I've been an organic farmer
5 and in the organic industry for well over 50 years. I was
6 around in California when we were putting together the Food
7 Production Act, and I was definitely in D.C. when we were
8 putting together the National Organic Program.

9 For those on the East Coast, good afternoon. For
10 those on the West Coast, like myself, good morning.

11 Right now I kind of look at it, we're experiencing a
12 little bit of a bump in the road, and I'm referring to the cuts
13 and freezing of some of the USA money that was channeled toward
14 organic. Somebody mentioned the TOPP program earlier, and I
15 think it's important to mention that through that TOPP program
16 and the monies that we got we've added -- and this could have
17 grown since then -- 75,000 acres of certified organic ground.
18 Back in the day, if we were able to eliminate one acre of
19 ground that has no glyphosate for example on it, consider that
20 a victory.

21 The other thing I've been very much involved in at
22 CCOF and with other fellow farmers that got a marketing
23 development grants, it is so important that we market organic
24 right now. We may have seen an increase in the growth, but we
25 are not seeing an increase in money, and if you're an organic

1 farmer, you're in there to make a living off of it.

2 We have too many growers in California that are
3 growing organically and getting conventional prices. You
4 cannot exist as an organic farmer with a conventional price.
5 You're lucky if you will break even on that price. I never
6 liked the term organic premium because I felt the extra money
7 that we made just covered our cost of doing business
8 organically, so it is important that we get out there and
9 market to the consumer that we are the best.

10 You know, and when it was back in the day, it was a
11 little bit of a no-no to say that organic agriculture was
12 better than conventional agriculture. Well, to hell with that.
13 We are better, and we should market it as such.

14 We do have some -- on YouTube, CCOF, we came up with
15 some commercials I guess you could say, marketing commercials,
16 and we're pushing the fact that organic is better for
17 consumption, higher in nutrition, just better for people, and
18 certainly better for the environment.

19 We've run into bumps in the road before. Back in the
20 day, the NOP tried to -- when we were forming the NOP, there
21 was a period there where genetic engineering was going to be
22 included in organic production. The organic community came
23 together as a whole, and we were able to stop that. So we're
24 in a situation now, don't panic over the bumps, and let's all
25 organize and get together and promote organic as the best form

1 of agriculture we have in the world.

2 Thank you.

3 CHAIR BRUCH: All right. Phil, thank you so much.

4 Sorry for the mispronunciation of your name.

5 MR. LARocca: It's all right.

6 CHAIR BRUCH: Really appreciate your marketing
7 message and your other comments.

8 Any questions from the Board?

9 (No response.)

10 CHAIR BRUCH: All right. I'm not seeing any Phil.

11 Thank you again.

12 All right. We have Lauren Pope, followed by Colehour
13 Bondera, and Frank Austin.

14 Lauren, please state your name and affiliation.

15 MS. POPE: Hi. I'm Lauren Pope, a certification and
16 policy specialist at OEFFA. We certify around 1,100 organic
17 farmers and processors in a 12-state region. I will be
18 speaking about risk-based certification and residue testing.
19 I'd like to start by welcoming the new Board members and
20 thanking all Board members and NOP staff for your time and
21 efforts on behalf of the organic community.

22 Regarding the new proposal and discussion document
23 about residue testing, we welcome the focus on the nuances of
24 testing. Testing the right products in the right way at the
25 right time is crucial.

1 With that in mind, we can't solely rely on EPA
2 tolerances. The EPA does not establish tolerances for
3 substances that they deem to not pose health risks and does not
4 set tolerances for all crops. A pesticide approved for citrus,
5 for example, would not have a tolerance for use on leafy
6 greens. The purpose of this proposal is to limit pesticide
7 residues in organic foods specifically. The EPA's tolerances
8 can help us, but it would be best for the organic community to
9 focus on determining our own tolerance levels.

10 As for the proposal that an operation informs
11 downstream buyers when a product has exclusion levels of
12 contamination, we support this. However, we would also like to
13 have more guidance on the expected outcomes of notification.
14 Simply informing buyers could lead to various responses,
15 pulling an item entirely, selling it as conventional, or no
16 action whatsoever.

17 As noted in the discussion document, buyers have an
18 incentive to sell an already purchased product. This is also a
19 strong argument for looking into the feasibility of stop sale
20 authority, either by the NOP or certifiers.

21 Finally, we appreciate the discussions of risk-based
22 certification that the NOP, NOSB, and members of the organic
23 community have engaged in. While a shared decision-making
24 matrix and any associated training would be welcome, we do want
25 to note a few areas of concern. ACA best practices are a great

1 resource, but they are not publicly available and are not
2 equivalent to NOP rules or even guidance when it comes to
3 enforcement.

4 We want to ensure consistency across the organic
5 industry, which includes inspectors who may be independent
6 contractors and are not required to be trained by any
7 particular program or certifier. We urge the NOSB and the NOP
8 to continue these discussions to create a sensible, enforceable
9 framework for evaluating risk.

10 Thank you for your time.

11 CHAIR BRUCH: Thanks, Lauren. Really appreciate your
12 comments today.

13 Any questions for Lauren?

14 (No response.)

15 CHAIR BRUCH: Lauren, quick question for you. You
16 mentioned about consistency. Do you have some best practices
17 on how we as a whole can achieve consistency, especially in the
18 risk-based certification?

19 MS. POPE: I mean as an industry, we've all been
20 focusing on risk-based in our own ways. I think it would be
21 good to take a look at what all certifiers have been doing and
22 maybe pooling that knowledge so that we're all, again, focusing
23 on risk in the same way because of course we all already have
24 started this process.

25 CHAIR BRUCH: Thank you, Lauren. Really appreciate

1 that.

2 Any other questions for Lauren?

3 (No response.

4 CHAIR BRUCH: Okay. Not seeing any.

5 We have our next speaker, Colehour Bondera, then we
6 have Frank Austin, and Matt Fitzgerald.

7 Go ahead, Colehour. Say your name and affiliation.

8 MR. BONDERA: My name is Colehour Bondera, and my
9 testimony is as an organic farmer of Kanalani Ohana Farm in
10 Honaunau, Hawaii. As a former NOSB member, 2011 to 2016, my
11 primary thoughts are to share what would help improve things
12 for those involved. I want to thank all the NOSB members for
13 your service and to the NOP for making this meeting happen
14 given the circumstance, and also wish everybody a Happy Earth
15 Day.

16 Let me also just say that since the 1980s I've
17 appreciated the leadership and efforts of Beyond Pesticides,
18 and since 2016 it has been an honor to serve on the Board. As
19 a Board member of said nonprofit who has been looking out for
20 organics since before they helped put together OFPA.

21 I would like to personally thank Dr. Terry Shistar
22 and Jay Feldman, both of whom testified earlier today, along
23 with -- he just testified -- Max Sano. Really appreciate that.
24 And I want to mention the support and work of the NOC and the
25 Real Organic Project have been critical for me as well.

1 So we are currently experiencing a process of
2 governmental control and change, which is not what I'm
3 referring to in the terms of the word improvement, since it's
4 about taking things apart rather than bringing them together.
5 I ask that you all don't presume that all change is positive.

6 And let me just comment, it's the fact that as a
7 small-scale, ethical-driven, long-time certified organic
8 farmer, programs such as the Organic Cost Share allow us to pay
9 our certification costs. Just so you know, they've been
10 significantly affected by -- and we've been certified for
11 decades -- by continual inflation-exceeding increases in the
12 certification fee, the inspection fee, and most recently
13 they've even been doing add-on fees which are newly charged
14 every year. I really need everybody that's hearing me to help
15 save the Cost Share because this is a problematic change we're
16 facing.

17 The NOSB and, more broadly, the organic community
18 overall is like a large family. Let me just be personal with
19 you and tell you I grew up with 10 siblings. I understand
20 hierarchy, I understand differential roles, as well as massive
21 range of perspectives and opinions on a topic and decision-
22 making. Priorities and how to compromise are what a group with
23 shared interests must engage in to be effective.

24 However, the NOSB and the organic community should
25 not and cannot ignore or eliminate those members who do not

1 lead the financial or the power and industry aspects of our
2 family. We need to treat each other as family members.

3 We can and should interact as if we're all equal
4 adult family members and not exclude those who we don't like
5 and not act as if we want others to leave the family. It
6 doesn't work, and while there is an important difference in
7 those who are money and salary driven versus those of us who
8 are integrity and concept driven, we nonetheless can and should
9 treat and be treated with equity and not be trying to buy out
10 the voices that we do not agree with.

11 The NOP and the NOSB must not play favorites or give
12 unequal recognition. And just let me give a specific case of
13 my feeling on this topic in closing. I remind you that a
14 decade ago I was Chair of the NOSB and -- excuse me, I was
15 Chair of the -- I guess my time is up, but I was Chair of the
16 Policy Development Subcommittee.

17 CHAIR BRUCH: Can you just stop?

18 MR. BANDERA: Sorry?

19 CHAIR BRUCH: Yeah, just please, just for the
20 interest of time, just wrap it up right here if you don't mind,
21 Colehour.

22 MR. BANDERA: That's fine.

23 CHAIR BRUCH: Okay. I apologize.

24 MR. BANDERA: Yeah, my comment was Chair of Policy
25 Development Subcommittee, and I support the effort of the

1 discussion document that was put forth.

2 CHAIR BRUCH: Excellent. Thank you. I apologize.

3 I wish we had a lot more time here in this exchange, but thank
4 you.

5 Any questions from the Board?

6 (No response.)

7 CHAIR BRUCH: I'm not seeing any. I really
8 appreciate your contributions, Colehour, and your commitment to
9 integrity. Thank you so much.

10 All right. We have Frank Austin, Matt Fitzgerald,
11 and then Angela Jackson.

12 Frank, are you on?

13 MR. AUSTIN: Yes, I am. How are you?

14 CHAIR BRUCH: Good. Please state your name and
15 affiliation.

16 MR. AUSTIN: Sure. Well, good afternoon, everyone,
17 and thank you for the opportunity to speak today. My name is
18 Frank Austin, and I serve as the Investment Director at Clear
19 Frontier, a sustainable online investment firm. I'm here today
20 to speak on a matter of tremendous urgency, the integrity of
21 organic inputs. I continue to see troubling trends in U.S.
22 import data that demand immediate attention from the USDA,
23 despite the SOE taking effect in September of 2024.

24 For example, since September of 2024, over 42,000
25 metric tons of cracked corn have been imported from the Black

1 Sea region, with 20,000 metric tons having been received year-
2 to-date. These shipments, routed through Turkey, lack
3 meaningful traceability to certified organic farmland.

4 Even more concerning, this year Turkey has emerged as
5 our largest supplier of organic soybeans, exporting over 39,000
6 metric tons, with Ethiopia following closely in second place at
7 24,000 metric tons. Here again, we see that without any
8 verifiable organic acres to justify those volumes, those
9 shipments are accepted into U.S. markets and marketed as
10 organic grain.

11 These suspect imports are entering our borders at
12 below market prices, eroding margins for U.S. organic farmers,
13 and undermining consumer trust in the USDA organic feed.

14 This is a problem that is not limited to feed grains.
15 Data also indicates issues in the organic banana market.
16 Currently the world's largest export at 1.2 million tons
17 annually, two of our top three trading partners in this
18 category also show a lack of verifiable production capacity.

19 This is why I urge NOSB to take strong action in
20 support of preemptive fraud prevention tools, particularly
21 mandatory residue testing as outlined in the recent bipartisan
22 legislation led by Senator Ricketts. We need systematic
23 testing protocols before fraudulent goods enter the U.S. supply
24 chain. Once the trade data reaches my desk, it's already too
25 late. This is not a theoretical problem. This is current, and

1 it is an ongoing threat.

2 Consumers rely on the USDA organic seal as a promise
3 that they are supporting legitimate organic practices and
4 American farmers. Without decisive action, we risk forfeiting
5 both that trust and the future of our domestic organic
6 industry. I'd like to strongly urge the Board to prioritize
7 and advance these preventative measures to protect fraud and to
8 prevent this from continuing and decimating the organic U.S.
9 economy.

10 I'd like to yield my time back, and we can pause for
11 any questions as well.

12 CHAIR BRUCH: Frank, thanks for your time today.

13 Any questions for Frank?

14 (No response.)

15 CHAIR BRUCH: Frank, you mentioned the need to be
16 proactive in fraud detection. Do you have any other ideas to
17 share with the Board on other tools that can help achieve this
18 proactiveness?

19 MR. AUSTIN: Sure. So I think that residue testing
20 is going to be really critical at this stage. I think the
21 other thing that is really lacking on its face is data
22 collection. So USDA does not have a clear picture of organic
23 acres by crop across the various import partners that we work
24 with. And I think that these are two really sort of easy areas
25 where USDA can expand its scope and actually really improve the

1 quality of imports that are coming to market.

2 CHAIR BRUCH: Thanks, Frank.

3 I see one more question from Brian.

4 BOARD MEMBER CALDWELL: Yeah. Frank, thanks so much
5 for your comments, and we really pay close attention to those
6 from the farmers that we've had that have said kind of the same
7 message. I would just encourage you to -- if you've already
8 written a comment, write another comment, and just include as
9 many of those statistics as you can about sources of grain that
10 appear to be dubious or questionable. I think that that
11 information is really, really helpful all the way around. So
12 thanks very much.

13 MR. AUSTIN: Absolutely. Thank you, Brian.

14 CHAIR BRUCH: Thank you, Brian, for that.

15 Any other questions for Frank?

16 (No response.)

17 CHAIR BRUCH: Nope.

18 Really appreciate your time again today, Frank.

19 MR. AUSTIN: Thank you.

20 CHAIR BRUCH: All right. We have Matt Fitzgerald,
21 Angela Jackson, followed by Johanna Phillips.

22 Matt, please take it away.

23 MR. FITZGERALD: Good afternoon, Board. My name is
24 Matthew Fitzgerald. I am an organic grain farmer in Minnesota.
25 And if you can't tell, I am calling from the field -- literally

1 -- so how about that for verification of authenticity?

2 Board, I'm an organic farmer of a second generation.
3 Our farm has been raising organic grains since 2000, so 25
4 years in the industry. We raise corn, soybeans, wheat, edible
5 beans for food and feed grade markets.

6 And our farm has had the opportunity to grow as the
7 industry has grown, and so it's something that we have been
8 encouraged by, seeing our neighbors and friends grow their own
9 operations, support family farms. And we're strong champions
10 to the organic industry and the integrity that the USDA NOP
11 program represents when consumers go to the market.

12 So what I'm here to speak about today is continuing
13 the comments around two main themes. One, the concerns around
14 imported grain, and the second, concerns about the continuation
15 of NOP staffing and strength.

16 So my first comment is related to the Organic Imports
17 Verification Act. This is something that I've worked on with
18 the Organic Farmers Association and with my own senator,
19 Senator Smith, here in Minnesota. This legislation is
20 bipartisan and identifies some of the key risks to our industry
21 through integrity issues.

22 And so the ask that I encourage the Board to do is to
23 prioritize the testing of imported grains, specifically looking
24 at residue, and emphasizing risk-based assessments so that we
25 can adjust and respond to any threats as the industry changes.

1 We know that American farmers can be highly productive and
2 highly competitive in a global market. We just need to be able
3 to play by the same rules.

4 And so I encourage the Board to prioritize testing
5 and continue the good work that has been done with SOE, but now
6 it's time to take it to a step further. In the previous
7 speaker's comments, it's highlighting that the issues have not
8 been resolved simply through SOE, and we need to continue to
9 advance the work that's already been done.

10 The second is issuing kind of a concern statement.
11 The National Organic Program far punches above its weight in
12 terms of the economic components, the contributions that we're
13 making to our local communities as well as the broader GDP, and
14 so the dollars that are spent on staffing at the USDA are a
15 great return on an investment. And as a farmer, I'm always
16 thinking about that ROI.

17 And so as I hear news coming out of D.C. and staffing
18 cuts, we're certainly encouraging efficiencies wherever we can
19 on our farm, and we support efficiencies at the USDA. But I
20 don't just get rid of my planter because it's expensive. We
21 know that when I have an expensive planter, it's bringing a
22 return back to my farm. And so please, as a Board, advocate
23 for continuing staffing levels so that we don't slip backwards
24 on the great ROI that we have through the USDA staffed NOP.

25 Thank you.

1 CHAIR BRUCH: Matt, thank you so much for those
2 comments.

3 Any questions from the Board?

4 (No response.)

5 CHAIR BRUCH: I'm not seeing any, but Matt, I got a
6 question for you. You mentioned investments and ROI and
7 continuing to grow our wonderful organic program. What do you
8 think would be a great catalyst, in your opinion, to grow even
9 more than what we have?

10 MR. FITZGERALD: So I know there's going to be a lot
11 of emphasis on research, but I think just continuing to drive
12 kind of integrity so that when farmers look at looking to
13 change their acres over into organics that they know that that
14 market's going to be stable long-term. So I think -- I know I
15 sound like a broken record -- but that's going to be a great
16 place to put our resources.

17 CHAIR BRUCH: Thank you. Really appreciate that.

18 Any other comments or questions from the Board?

19 (No response.)

20 CHAIR BRUCH: I'm not seeing any. Good luck.
21 Safe spring.

22 All right. Angela Jackson, then we have Johanna
23 Phillips, and then Ryan Klassen.

24 Go ahead, Angela. Please state your name and
25 affiliation.

1 MS. JACKSON: Yeah. Thank you to the NOSB for the
2 opportunity to speak today to support residue testing for the
3 Global Supply Chain Proposal. My name is Angela Jackson at
4 Prairie Sun Organics. We are a certified organic farm in
5 southeast South Dakota, certified by MOSA. And I am speaking
6 from the perspective of a small-scale organic family farmer
7 selling hay, row crops, vegetables, fruits, berries, eggs, and
8 meat chickens.

9 I have done pesticide residue testing on my own farm
10 from drift, and experienced the associated challenges and costs
11 of conducting my own investigation after the loss of some acres
12 due to the application of prohibited substances. And I
13 appreciate having -- as a result of that, I do appreciate
14 having delivered my grain, probed at the buyer's facility, and
15 rapid tested for GMOs at their cost, not mine, because it
16 prevented some contaminated stuff from entering the supply
17 chain. So I appreciate the Board's continued commitment to
18 strengthening organic integrity.

19 I support it, especially in the global supply chain
20 which is becoming increasingly complex. So I want to speak in
21 support of residue testing of food and feed commodities within
22 the global organic and feed commodities of the global supply
23 chain as an important tool in preserving consumer trust in the
24 USDA organic seal.

25 And as more products are sourced from diverse regions

1 around the world, the need to verify compliance through testing
2 becomes even more critical, and residue testing provides an
3 added layer of accountability, helping to detect potential
4 contamination or fraud that might otherwise go unnoticed in the
5 paperwork or certification alone. Especially in countries
6 where enforcement infrastructure may vary, testing serves as a
7 backdrop to maintain consistent standards.

8 That said, I do want to raise some practical concerns
9 regarding the implementation of a residue testing requirement
10 across the global supply chain. In particular, access to
11 accredited laboratories is not equal in all countries. While
12 entities in the U.S. and Canada may have established
13 relationships with labs that meet NOP accredited standards,
14 samples taken in developing nations may be more difficult to
15 find qualified labs. So without access, the cost and logistics
16 of sample shipping or combined with potential delays can
17 undermine the feasibility of testing.

18 And then I also want to mention about processing
19 times at labs vary, and some countries face longer turnaround
20 times due to limited infrastructure. So in cases where
21 perishable goods are involved, delays can disrupt market access
22 and create additional risks.

23 Testing the most likely pesticides found on the crop
24 in the region where it is grown is a great goal, but testing of
25 residues from drift on our farm also revealed that that was not

1 the case. So fungicides and insecticides not intended for food
2 and feed was found in some of our residue tests, and an
3 investigation revealed that they didn't know where it came
4 from. It fell out of the sky, was one plausible source.

5 So this is something to be aware of, that those who
6 want to cheat the system may not use commonly used fungicides
7 and insecticides on those crops. That's where we seem to find
8 the most problems on our farm when things test positive. And
9 of course, cost is another significant concern.

10 Residue testing is part of the solution. We do it on
11 our farm, but it costs thousands of dollars. So sample testing
12 for positive-prohibited substances above the allowed threshold
13 should also be investigated. So in my own farm, I sent two
14 samples to two labs -- identical samples -- and they both
15 tested different. So I just want to share that.

16 Thank you for your time.

17 CHAIR BRUCH: Angela, thank you so much for your
18 presence today and being an organic farmer.

19 Any questions for Angela?

20 We have one from Kathryn. Go ahead.

21 BOARD MEMBER DESCHENES: What is your experience with
22 buyers? Like how often are your own buyers requesting for
23 pesticide residue testing for the goods that they buy from you?

24 MS. JACKSON: Never on pesticides, but always for
25 GMO. They do a GMO rapid test on every load that's delivered,

1 but I've never been asked to do one on pesticides.

2 BOARD MEMBER DESCHENES: And you said you were doing
3 some of that yourself?

4 MS. JACKSON: Yes. And we found some very
5 interesting results.

6 BOARD MEMBER DESCHENES: Tell me more about that.

7 MS. JACKSON: Well, we found a lot of chemicals that
8 we don't know where they came from, and so we launched an
9 investigation with our certifier to try to find the source of
10 those, and we were not able to ascertain the source of those,
11 some of which were over the threshold. And it was a long, very
12 complex \$10,000 cost of lots of pesticide testing, which is
13 very, very, very expensive. And so pushing those costs down on
14 the farmer is not sustainable either. That cost needs to come
15 from someplace else. I don't know what that is.

16 BOARD MEMBER DESCHENES: Yeah. Do you have any
17 suggestions for how those costs could be covered?

18 MS. JACKSON: I don't know. One test alone is
19 \$3,000. And we spent over \$10,000 on five samples due to the
20 complexity of the testing that needed to be done because the
21 chemicals that were coming up were not standard in the supply
22 chain. So when you're testing for these fungicides and
23 insecticides, there are so many different ones to test for, and
24 they're all in different families and classes. It gets
25 expensive. I don't know who is going to do them, but I think

1 it warrants further thought and further investigation into
2 this.

3 BOARD MEMBER DESCHENES: Thank you.

4 CHAIR BRUCH: Angela, I see a question from Logan.

5 BOARD MEMBER PETREY: Hi. Thank you. Yeah, so
6 that's a great point because, you know, with herbicides it's a
7 little restricted on what people that can't quite go off label
8 because herbicides really require some of the GMOs. You know,
9 you can't apply something like a fungicide you might be able
10 to. So what you're saying is it's not just potentially that
11 they're -- well, there's cheating within the label on a
12 conventional farm. That could be going on, you know, we could
13 be applying it.

14 So if we're looking at, say, okay, these fungicides
15 and these insecticides are labeled for this crop type, maybe we
16 should look this way. You're saying it could be used around
17 there on a crop, you know, or they could be using a fungicide
18 on a peanut or corn that's not necessarily labeled, and that's
19 how it's getting onto your farm. Is that what you're saying,
20 something that are not even labeled?

21 MS. JACKSON: Correct. Our investigation revealed
22 that our neighbors were going off label on the products and
23 using special brews that were not allowed, were not used --
24 commonly used, yes.

25 BOARD MEMBER PETREY: Okay. That opens the doors a

1 lot more to potentials. Okay. Thank you.

2 CHAIR BRUCH: Thanks, Logan.

3

4 Thanks, Angela. I really appreciate your time today
5 and your comments.

6 We're going to go to Johanna Phillips next, with
7 Ryan Klassen and Lia Sieler on deck.

8 Johanna, please state your name and affiliation.

9 MS. PHILLIPS: Okay. My name is Johanna Phillips,
10 Director of Business Development and Technical Affairs with
11 Strengthening Organic Systems. I am commenting on behalf of
12 SOS today. We appreciate the dedication of the incredible
13 National Organic Program staff and NOSB members. Thank you for
14 the opportunity to comment today.

15 I'm going to discuss residue proposal and the residue
16 discussion document. With over 80 years of combined experience
17 in policy, standards, certification, and market leadership, SOS
18 -- including Kim Dietz and Gwendolyn Wyard -- offers organic
19 advising across all business needs, including fraud prevention
20 and NOSB policy.

21 To begin comments, we focus on the proposals under
22 residue testing. SOS strongly supports the thoughtful
23 recommendations to update NOP 2610, 2611, 2611-1, 2613, and
24 recommends NOSB Board acceptance.

25 Additionally, SOS agrees with the proposal by NOSB

1 CACS to consider expanding NOP 5012 to highlight the
2 opportunity to enhance compliance in liquid fertilizer usage in
3 organic production. We encourage NOSB to pass the full
4 proposal at this meeting.

5 Organic products are subject to federal oversight
6 through process-based certification. Given the enormous market
7 value, there are significant incentives for organic fraud:
8 reducing input expenses, managing pests inexpensively, treating
9 livestock, and mixing conventional and organic products to
10 increase yields.

11 Expanded testing instructions are crucial for
12 encouraging more extensive and effective testing methods,
13 offering a science-based and defensible approach to confirming
14 integrity in organic production. Effective instruction acts as
15 a deterrent to fraud, provides a validation tool, and a
16 resource to deter and to catch cheaters.

17 Moreover, certifiers would be provided with
18 supportive instruction to identify effective testing
19 approaches, selecting the right fit for the specific concern
20 across the supply chain -- not a substitute for effective
21 process-based certification, but to validate the compliance.
22 These instructions must be updated with current science and
23 resources, and now is the time. Strengthening marketplace
24 confidence through testing is an enforcement and validation
25 tool.

1 Regarding the discussion document, Residue Testing
2 for Global Supply Chain, SOS acknowledges several questions and
3 intends to further expand response in our written comments.
4 Based on the identified inconsistency of some certifying agents
5 relating to 205671 of the rule -- although we believe there's
6 adequate confirmation to exclude product from organic sale --
7 we recommend written clarification be included in instruction
8 by NOP or an update to the regulation to ensure certifiers
9 exclude products and operations from the organic marketplace
10 when an application event has occurred, ensuring consistent and
11 equitable marketplace. We also encourage consideration of
12 increasing certifier flexibility and cost of testing, which is
13 currently restricted.

14 Thank you for your consideration.

15 CHAIR BRUCH: Thanks, Johanna. I was just going to
16 jump in there, so you beat me to the punch. Really appreciate
17 it.

18 Any questions from the Board for Johanna?

19 (No response.)

20 CHAIR BRUCH: All right. I have a question for you,
21 Johanna. I asked this at the front part of the meeting. We're
22 talking about tools to validate compliance. I appreciate the
23 comments that SOS is supplying for the residue testing. Are
24 there any other ways to validate compliance, reconcile records,
25 just to confirm authenticity outside of testing that we're

1 aware of?

2 MS. PHILLIPS: Well, I think there are really
3 expanded data tools with what USDA has included in the Organic
4 Integrity Database. I think there's more to be accomplished
5 there because currently crop information is aggregated by
6 producer. And if additional crop information by specific crop
7 type were present in the Organic Integrity Database, it would
8 be a real-time opportunity for certifiers to do a mass balance
9 assessment at the farm level. So I think that's a tool that
10 could be used.

11 Certainly having worked on several fraud cases, you
12 know, there are some well-known and established things out
13 there relating to fraud, which is what's the opportunity,
14 what's the incentive, and where is the pressure? So thinking
15 about, you know, what the practical reasons are that operations
16 would commit fraud, and then looking and really questioning
17 what is presented to you beyond face value.

18 CHAIR BRUCH: Excellent. Thank you so much, Johanna.

19 Any other questions from the Board?

20 (No response.)

21 CHAIR BRUCH: All right. Not seeing any. Appreciate
22 your time.

23 Okay. We have Ryan Klassen, followed by Lia Sieler,
24 and Ed Maltby.

25 Ryan, please state your name and affiliation.

1 MS. ARSENAULT: Amy, we are not seeing Ryan on the
2 line with us.

3 CHAIR BRUCH: Okay. Thank you, Michelle. We will
4 try to catch up with him at the end of the day. We'll go to
5 Lia Sieler, followed by Ed Maltby.

6 Leah, please state your name and affiliation.

7 MS. SIELER: Thanks, Amy. My name is Lia Sieler.
8 I'm the Executive Director for the Western Organic Dairy
9 Producers Alliance, also known as WODPA. I'd like to start out
10 by thanking the NOSB Board members for your work this past
11 year. Your work, as well as this process, are crucial to the
12 organic industry, and we recognize and appreciate the work that
13 you put in to maintain integrity to the organic seal.

14 WODPA also is committed to advocating for organic
15 dairies, their livelihoods, and issues impacting the
16 sustainability of the organic dairy. We appreciate the
17 opportunity to comment today on sunset materials, as well as
18 the idea of risk-based certification.

19 Two sunset materials that we want to comment on today
20 are flunixin and oxytocin. WODPA supports the relisting of
21 flunixin, as it is one of the only tools in our toolbox to
22 provide pain mitigation for a whole host of ailments. In order
23 to maintain the exceptional standards our farmers have
24 regarding animal welfare, we need flunixin available for use.

25 WODPA also supports the relisting of oxytocin, with

1 an annotation that provides clarity to farmers and herd
2 veterinarians. In the past, oxytocin has been used to assist
3 in animals' milk production or used as an aid for letting their
4 milk down quicker. WODPA supports an annotation restricting
5 the use of oxytocin to only be used in dire situations related
6 to labor and immediately thereafter. However, it is essential
7 to have oxytocin as an option for veterinarians to prescribe
8 and farmers to use on their farms.

9 We also want to take the opportunity to speak
10 regarding risk-based certification. Although WODPA does
11 recognize the immense burden placed on farmers with the
12 implementation of the Strengthening Organic Enforcement Rule,
13 we do not think that risk-based certification is necessarily
14 the answer.

15 We know that certifiers currently have their own
16 methods for assessing risk of fraudulent behavior. We do
17 understand the need for the SOE rule, and we support the
18 premise of why it was created and implemented. However, we see
19 all of our organic dairy operations taking the front of this
20 implementation, whether it is increased financial burden,
21 increased certification requirements, or all-around strained
22 relationships with certifiers.

23 The ACA SCTA Risk Scorecard defines low risk of any
24 livestock operations that provide over 40 percent dry matter
25 intake. In WODPA's opinion, this provides enticing benefits

1 for people to provide false claims for their livestock
2 operations and information to meet that 40 percent threshold
3 and therefore receive less scrutiny when it comes to annual or
4 surprise inspections.

5 According to the current NOP standards, there's no
6 difference between achieving the minimum pasture requirements
7 for livestock above six months of age or guaranteeing that they
8 receive over 40 percent dry matter intake from pasture. All
9 operations, regardless of size or rations, should be inspected
10 the same.

11 In regard to certification costs, a large majority of
12 the costs could be mitigated by providing digital copies of the
13 farm for the inspectors to review prior to inspection. We need
14 to see more consistency.

15 Thank you for letting me comment today.

16 CHAIR BRUCH: Thanks, Lia, for presenting some
17 challenges and some solutions there.

18 Any questions for Lia?

19 (No response.)

20 CHAIR BRUCH: Okay. Thank you again, Lia.

21 We will move on to our next speaker. We have
22 Ed Maltby followed by Byron Goolsby and then Bruce Kaser.
23 Ed.

24 MR. MALTBY: Good afternoon. My name is Ed Maltby,
25 Executive Director of the Northeast Organic Dairy Producers

1 Alliance and longtime livestock farmer. It's my immense
2 pleasure to follow Lia in making comments, and we are aligned
3 in the East with the majority of what Lia says.

4 Thank you to the NOSB Board members for their time
5 and service to the organic community and your ability to be
6 flexible in, for want of a better word, changing situations.
7 It is essential to the integrity of the National Organic
8 Program, and to the profitable and stable economic future for
9 organic farmers and ranchers, that the program is fully funded
10 and staffed.

11 Technical reviews. We recommend that there is an
12 automatic and immediate request for a TR as soon as a petition
13 is accepted, placing any new material on the National List for
14 the following reasons. A TR provides an easily accessible
15 review, which is published on the USDA website, of how a
16 material complies with OFPA criteria.

17 Reviews discussed in subcommittee calls are not
18 accessible to the public at all. TRs are an important third-
19 party review following the TR template. While individual Board
20 members might have experience on a particular material, the
21 independent TR gives all Board members and the public access to
22 the same information and provides a transparent form of
23 discussion.

24 Public commenting. The Board is responsible for
25 ensuring that commentators can feel respected and make their

1 comments in a safe environment, free of any concern that they
2 may be subject to inappropriate questioning by Board members.
3 The input of farmers is critical to the integrity of the
4 organic seal.

5 Commentators at NOSB meetings are asked not to
6 question the character or integrity of an individual, not to
7 request that the Board also follow these rules when asking
8 questions of commenters. The Board can ask typical questions
9 about the comments a person makes, but should assume that that
10 person is giving comments because they care about organics and
11 have an opinion that they would like the Board to consider.

12 There have been instances where the line of
13 questioning bordered on questioning the integrity of the
14 person, commenting and undermining of their comments. We
15 request that language is added to the NOSB Policy and
16 Procedures manual to ask Board members to refrain from making
17 any personal attacks or remarks that might undermine or malign
18 the character of the individual, entity or organization.

19 NODPA also supports the relisting of flunixin and
20 oxytocin for the same reasons that Lia stated so eloquently in
21 her comments.

22 Thank you.

23 CHAIR BRUCH: Thank you, Ed, for your time today.

24 Any questions for Ed from the Board?

25 (No response.)

1 CHAIR BRUCH: All right. Ed, I'm not seeing any.
2 Thank you again. Really appreciate it.

3 We'll go to Byron Goolsby, followed by Bruce Kaser,
4 then Jerod Reuter.

5 Go ahead, Byron. Please state your name and
6 affiliation.

7 MS. ARSENAULT: Amy, we are not seeing Byron online
8 with us today. Going to check once more. Nope.

9 CHAIR BRUCH: Okay. Thank you, Michelle. I
10 appreciate that.

11 MS. ARSENAULT: You're welcome.

12 CHAIR BRUCH: We will try to catch up with him later
13 on in the day. We will go to Bruce Kaser, followed by Jerod
14 Reuter.

15 Bruce, please state your name and affiliation.

16 MR. KASER: Thank you. My name is Bruce Kaser. I'm
17 an organic hazelnut farmer affiliated with Pratum Farm, LLC.
18 Angela Jackson's comments were great. I have a couple of
19 comments about the risk-based certification proposal made by
20 the CACS.

21 Many of you are aware that our farm is in litigation
22 with the USDA over what is essentially risk-based farm
23 inspections. The farm inspection statute states that every
24 farm needs to be inspected annually, on-site, by an accredited
25 certifier's inspector. The statute does not have an exception

1 that states unless the certifier assesses there is no risk in
2 not doing the inspection.

3 As a consequence of so-called risk assessment, the
4 USDA organic certification seal is being falsely applied to
5 food products that are imported from millions of uncertified
6 farms because, in part, the farms were not inspected as
7 required by statute, even though the NOP tells the public
8 something different. As an aside, another part of this problem
9 is that foreign farmers are not required to personally verify
10 organic compliance with U.S. statutes, even though there is a
11 statute that specifically requires individual farmer
12 verification.

13 I'm sure that many of you are aware of proposed
14 legislation that is likely to create procedures for risk-based
15 pesticide residue testing to be used on imported feed grains.
16 The intent of the CACS proposal is unclear as applied to that
17 particular issue. It may be that the certifiers simply want to
18 reduce their cost burden in paying for the NOP standard residue
19 tests which, by the way, is a limited test and does not do
20 what's necessary for the detection of some of the worst
21 chemicals in use today -- like Roundup, for example -- or the
22 chemicals that are used to fumigate bulk grain shipments from
23 countries like Turkey.

24 The CACS proposal needs more clarity. Let me give
25 you a glaring example. The very first sentence of the proposal

1 states this: Risk-based oversight as a model for decision-
2 making and compliance prevention strategy is an approach used
3 by certified operations and certifiers in organic
4 certification.

5 What is compliance prevention strategy, anyhow? I
6 mean, maybe it's just a typo because it would seem that the
7 overall intent should be to have a strategy that promotes
8 compliance, not prevents it. On the other hand, if it is a
9 typo, it was sure missed by a lot of people. So maybe someone
10 on the Board can explain what compliance prevention strategy
11 is.

12 Thank you.

13 CHAIR BRUCH: Thank you, Bruce, for your time today.

14 Any questions for Bruce?

15 (No response.)

16 CHAIR BRUCH: Bruce, I'm not seeing any. Thank you.
17 Really appreciate it. Have a nice day.

18 We're going to move on to Jerod Reuter, followed by
19 John Foster, and then Kim Dietz.

20 Jerod, please state your name and affiliation.

21 MS. ARSENAULT: Amy, we are not finding Jerod on the
22 line with us at the moment. Let me just double check once
23 more.

24 CHAIR BRUCH: Yeah. Thanks, Michelle. Appreciate
25 your background work here.

1 MS. ARSENAULT: You're welcome. Nope, not seeing
2 him. Thanks.

3 CHAIR BRUCH: Okay. We will catch up with him on
4 back end, hopefully.

5 John Foster, you're up. Please state your name and
6 affiliation.

7 MR. FOSTER: All right. Can you hear me okay? Oh,
8 hold on.

9 CHAIR BRUCH: Okay.

10 MR. FOSTER: Any better?

11 CHAIR BRUCH: Still quite an echo. I don't know if
12 you have multiple devices on.

13 MR. FOSTER: You know me. I just can't get enough.

14 CHAIR BRUCH: That's all right.

15 MS. ARSENAULT: That is much better.

16 CHAIR BRUCH: That is much better. Thank you, John.
17 Go ahead.

18 MR. FOSTER: Sure. Let's see. All righty. Well,
19 I'm John Foster, and in addition to being an NOSB alumni from
20 2015 to -- sorry, 2010 to 2015, I have three affiliations that
21 are relevant here. I'm the COO of Wolf & Associates, founder
22 and principal of Box 7 Imports, and a member of the Board of
23 Directors of Organic Seed Alliance.

24 Well, first, thanks so much for the opportunity to
25 speak. Really glad the meeting ended up happening after all.

1 And thank you for each of the members' service. It's going to
2 be quite a ride for the new folks, so a special welcome to you
3 all.

4 My overarching professional goal is to bring the
5 benefits of organic theory and practice to as many as possible,
6 and all the comments come from that priority. I have a short
7 list of items.

8 Oh, next slide, please. Sorry, Michelle.

9 Short list of items here, but as usual, happy to
10 speak to any items on the agenda if that's helpful.

11 First, I support the CACS Residue Testing Proposal as
12 part of modernizing the approach to residue testing and
13 verification set for our process-centric certification
14 standards. I applaud the thorough review and recommendations
15 in it. That was a heavy lift. I really appreciate that.
16 But I do forecast that reconsidering the meaning and
17 application of ERA will continue to be a very trying task, and
18 that's an essential part of that revision.

19 I'd like to offer also to the Board -- we can send
20 that January white paper we wrote on that topic to anyone who
21 missed it back then, happy to send that along. Just let us
22 know.

23 Though not on the agenda, those of you who know me
24 know what's coming next. I again ask that prioritizing
25 revisiting the application of commercial availability for seeds

1 and planting stock on crops, as well as ingredients and organic
2 handling and processing. Our comments last fall included a
3 recommendation to pivot toward registering commercial demand
4 instead of leaning just on reports of commercial availability
5 or supply. I think everyone agrees this has provided less than
6 optimal results.

7 Although the future work needed for this is a months
8 and years-long endeavor, the benefits would be very long-
9 lasting. So happy to talk about that, and we'll provide more
10 written comments on that in the future.

11 Lastly, I really wish I had better news here, a
12 better forecast, but I think the coming years will be pretty
13 lean for the NOP and NOSB, and for those who have really served
14 the community from both entities with service and support and
15 especially civility in recent years. So I really encourage the
16 Board to focus first on making and keeping the National List as
17 sound and sensible as a tool as possible to facilitate the
18 thriving of as many participants as possible, and to do so with
19 a global perspective in mind.

20 Even though all of the market we focus on is here in
21 the U.S., the supply chain is global, and access to essential
22 tools on the National List are far from uniform, or equitable,
23 for that matter. So for that reason, we've always urged an
24 expansive and inclusive National List.

25 Thanks again for the time to speak. We'll be

1 submitting written comments as we have in past years, and happy
2 to provide any information on those.

3 Thank you.

4 CHAIR BRUCH: Okay. Thanks, John. I really
5 appreciate your comments.

6 I see a couple of hands here. Let's go to Kathryn
7 first, then Nate.

8 BOARD MEMBER DESCHENES: Sure. Thanks, John. I was
9 just curious, in your white paper about the international
10 competitiveness, and like what we're doing in the U.S. versus
11 what other countries are doing, and how we might improve to
12 make it more standard.

13 MR. FOSTER: Sure. I think the reference there was
14 intended, anyway, to speak to inerts that are present in
15 formulations available in Europe that are not necessarily
16 available here. So when crops are grown or, you know, mostly
17 crops grown, produced there with all the inputs available, they
18 use inert ingredients.

19 The EU system does not get into the nitty-gritty,
20 shall we say, parts the way we do, so there are some inerts
21 used in formulations over there that produce crops that come
22 here. That feels to me like that's putting some disadvantage
23 for American producers, certainly producers of American input
24 supplies. So that was that piece of that white paper.

25 BOARD MEMBER DESCHENES: Perfect.

1 MR. FOSTER: I could go on, but I won't.

2 BOARD MEMBER DESCHENES: Okay. We'll let Nate do his
3 question. Thank you.

4 CHAIR BRUCH: Yeah, perfect. Thanks, Kathryn.
5 Thanks, John.

6 Moving on to Nate.

7 SECRETARY LEWIS: Yeah, John, I suspect when you were
8 on the Board, you also spent a considerable amount of time
9 addressing sunsets of materials already on the National List.

10 MR. FOSTER: One or two.

11 SECRETARY LEWIS: Fair assumption. I'm curious if
12 you have any thoughts on the PDS's proposal to trial a consent-
13 agenda-like approach to voting at the fall meeting.

14 MR. FOSTER: Yeah. In a phrase, I love it. My class
15 was the one that -- We started doubling up on agenda items
16 because showing up on the fives and tens used to mean that
17 you'd get shoved with the full sunset review that first year on
18 any zeros or fives in the year. And that was tough because we
19 came in a crop of five at a time back then, like now.

20 So we started breaking that up a little bit and
21 getting a little bit ahead. The next cohort did more of that
22 work, so it's a little more spread out, but still it's a heavy
23 lift.

24 So I think for, in general, definitely I support it.
25 I feel like the structure and the functionality of the Board

1 process is reliable. I think the consent agenda -- with one
2 exception I think -- it may be rational to take a consent
3 agenda and use that in cases where materials have been reviewed
4 multiple times. Perhaps if a material has only been on the
5 list for a handful of years -- five years, say -- maybe that
6 stays out of a consent agenda.

7 But by and large, you all are going to need as much
8 efficiency gains as possible. And in the cases where -- I
9 think in those cases, in those measured cases, there's no way
10 to lose transparency because everyone knows what's on the
11 consent agenda well in advance.

12 And if there's anyone out in the community who has a
13 concern about one of those items, the process allows to call
14 that out well in advance. The way you do it now, spring and
15 fall, plenty of time to call it out and make adjustments before
16 the fall meeting if public comment dictates you should.

17 CHAIR BRUCH: Great. Thank you, John. I really
18 appreciate your comments today.

19 One thing you mentioned in your white paper about the
20 potential to circulate it with Board members, I would like to
21 request you putting it on the comment docket if you don't mind,
22 and then everybody will have access to it.

23 MR. FOSTER: We will do that. Yep.

24 CHAIR BRUCH: All right. Thank you.

25 Any other questions for John?

1 (No response.)

2 CHAIR BRUCH: All right. Really appreciate your
3 leadership in our community. Thanks, John.

4 Moving on to Kim Dietz, then Marni Karlin, then
5 Sarah Neagu-Reed.

6 Go ahead, Kim. Please state your name and
7 affiliation.

8 MS. DIETZ: Okay. Hi. My name is Kim Dietz. I'm
9 the founding partner of Strengthening Organic Systems. For the
10 record, today I am speaking on behalf of my company and not as
11 a paid advisor for any clients. I want to start off by
12 thanking the NOP staff and NOSB for all your service. I
13 understand the commitment required to uphold organic integrity.

14 I served on the NOSB from 2000 to 2005 in the handler
15 seat, chaired the Materials Committee, and served as Board
16 Secretary. My professional background includes over 35 years
17 in handling, as well as one of the founders of OMRI and past
18 OTA Board president and Board member.

19 I co-founded Strengthening Organic Systems with
20 Gwendolyn Wyard, and we also have the privilege of working with
21 Johanna Phillips -- as you know -- together. Our combined
22 experience in policy standards, certification, leadership, we
23 try to advise in all areas and all business needs.

24 So today I'd like to just provide public comment on
25 the risk-based certification approach. As you know, risk-based

1 oversight is an area of particular interest for Strengthening
2 Organic Systems.

3 We commented on this topic during the Fall 2024 NOSB
4 meeting and agreed that certification carries a heavy
5 administrative process burden. This, along with the SOE rule
6 in fraud prevention, underscores the challenges that certifiers
7 encounter in determining just the right approach for different
8 types of entities. And as the NOSB and everyone knows, small
9 operations of low risk carry a heavy burden to comply with
10 these requirements.

11 We believe that risk-based certification supports a
12 more efficient use of resources and reduces the burden on those
13 low-risk operations. My request today is for you to consider
14 the low-risk producer in your deliberations and support the
15 sound and sensible approach that you commented on.

16 Since the SOE rule, SOS has helped numerous
17 operations become compliant. In our opinion, it is costly and
18 frustrating to work on several pages of an SOP that has no
19 relevancy to their operation, or to develop a robust fraud
20 prevention plan for a low-risk ingredient product. We
21 encourage the risk criteria approach, and support ongoing best
22 practice documents and training for inspectors. SOS is in
23 support of your recommendation and the revised definitions.

24 I also want to speak briefly on the sunset process
25 and sunset materials. And John, thank you for your comments a

1 minute ago. I do support the consent agenda approach.

2 SOS is in support of relisting all handling material,
3 sunset materials, and as past NOSB Materials Chair, I encourage
4 you all to ensure the materials are not removed from the
5 National List unless new information is brought forward to the
6 Board or there is a viable alternative for the substance.

7 Thank you.

8 CHAIR BRUCH: Kim, thanks for your time today, your
9 comments.

10 Any questions for Kim?

11 (No response.)

12 MS. DIETZ: All right.

13 CHAIR BRUCH: I really appreciate it.

14 Thank you so much.

15 Moving on, we have Marni Karlin, followed by
16 Sarah Neagu-Reed, and then a break.

17 CHAIR BRUCH: So, Marni, take it away.

18 MS. KARLIN: Thanks, Amy. Can you hear me?

19 CHAIR BRUCH: Yes, I do.

20 MS. KARLIN: Hi, and Happy Earth Day. My name is
21 Marni Karlin, and I'm from Karlin Strategic Consulting. I work
22 with stakeholders to build a better food system. And today I'm
23 here on behalf of the Accredited Certifiers Association, who
24 ensures consistent interpretation of organic regulations
25 through collaboration and education of accredited certification

1 agencies.

2 Welcome to our five new Board members. Thank you, as
3 well as the continuing members, for your service to organic.

4 I'm here today to talk about three topics: The role
5 of USDA in our public-private partnership, risk-based
6 certification, and -- if I have time -- residue testing.

7 First, I want to acknowledge our partners at NOP,
8 public servants who are committed to the organic sector and
9 work tirelessly to develop standards, accredit certifiers,
10 negotiate equivalence arrangements, and bring enforcement
11 actions. Their work is critical to and part of the reason for
12 organics' success.

13 Organic is made stronger by the complementary roles
14 the USDA staff and the rest of the community play, by how we
15 lean into our skills and leverage our strengths. Organic is a
16 public-private partnership success story, and none of it would
17 happen without the NOP team.

18 Second, risk-based certification. Risk-based
19 certification just makes sense. It makes good use of
20 certification and inspection resources, it limits unnecessary
21 burdens in low-risk situations, and it enhances organic
22 integrity. I'll focus on a few specifics in the proposal.

23 We appreciate the acknowledgement that even with a
24 baseline of common risk criteria, certifiers must retain
25 flexibility to apply a risk-based approach, reflecting the

1 office focus on site-specific compliance verification. We also
2 appreciate the recognition of the collaboration between NOP and
3 ACA to evaluate regulatory text and use critical thinking to
4 develop a different approach to compliance verification.

5 I'm pleased to report that this work is ongoing.
6 We opened and closed our January 2025 annual training with
7 participatory sessions developing risk-based approaches to
8 sections of the regulations, and we continue to work toward a
9 consistent approach to this. Also, anecdotally, we're hearing
10 that both certification and accreditation audits have been more
11 risk-based, deploying resources to the highest risk areas
12 without compromising organic integrity.

13 Stay tuned for additional resources and training on
14 this topic. We're rolling out an academy of online courses
15 that will be more nimble and reach more folks.

16 Finally, residue testing. While residue testing does
17 not replace certification and compliance verification, it can
18 be a tool to help certifiers evaluate if an operation's
19 processes are sufficient to prevent contamination, commingling,
20 and fraud, and we support it being used as a tool when risk
21 assessment shows it would do so.

22 We also align with QCS's and OEFFA's comments earlier
23 today that we must determine when and where in the supply chain
24 testing should be conducted, testing the right products in the
25 right way at the right time. We defer to our certifier members

1 on other specifics of the proposal and discussion document, and
2 we'll follow up additionally in our written comments.

3 Thank you all again for your service, and I'm happy
4 to answer any questions.

5 CHAIR BRUCH: Thank you, Marni. I really appreciate
6 your comments.

7 Any questions for Marni? Go ahead, Kyla.

8 BOARD MEMBER SMITH: Hi, Marni. Thanks for your
9 comments. I can wait to read the written comments, but I
10 wondered if you were able to, in like two sentences, just say
11 in general whether or not the ACA generally is supportive of
12 the work of the residue test proposal. I know I sit on that
13 working group, and it seems to be that we're marching along in
14 the same direction, but I just wanted to state it for the
15 record, making sure I'm not off in left field or whatever.
16 Thank you.

17 MS. KARLIN: Thanks, Kyla. And yes -- in one or two
18 sentences -- yes, we are generally supportive of the proposal,
19 but stay tuned for the written comments for details. I
20 apologize. Time frame was scrunched, as we all know, so --

21 CHAIR BRUCH: Okay. Thank you, Marni. Thanks, Kyla,
22 for that question.

23 Any other questions for Marni?

24 (No response.)

25 CHAIR BRUCH: I have one quick one. I've asked it a

1 couple times, Marni, curious on your perspective about
2 additional compliance verification tools when we're looking at,
3 you know, process-based system and ensuring authenticity of
4 records. What are our best techniques, procedures there that
5 you can offer up?

6 MS. KARLIN: Yeah, I've been hearing you ask that
7 question. I've been thinking about it all afternoon. So I
8 don't have a great answer for you just yet, but I think it's
9 part of this risk-based approach, is figuring out which
10 documents -- what we're trying to verify, what documents will
11 support that verification, and then how we can trust that they
12 are authentic.

13 I think that's something that we're going to work
14 with our certifier members on, trying to understand what their
15 current best practices are for verification of authenticity,
16 where they see room for improvement, and hopefully together as
17 a community of certifiers we can find the answer to that, how
18 we can better verify authenticity. I think that's the best I
19 have right now, but it's definitely on my radar.

20 CHAIR BRUCH: Thank you. I appreciate that answer.
21 Any other questions from the Board?

22 (No response.)

23 CHAIR BRUCH: Okay. We'll keep moving. We have
24 Sarah Neagu-Reed, and then we're up for a break.

25 So, Sarah, please state your name and affiliation.

1 MS. NEAGU-REED: Yes, absolutely, and I hope I don't
2 have technical issues this time. Good afternoon. My name is
3 Sarah Neagu-Reed, and I serve as the Director of Production and
4 Environmental Policy at the International Fresh Produce
5 Association. We are a trade association that represents over
6 2,500 companies, including more than 500 companies with
7 certified organic fresh fruit and vegetable production.

8 Today I'm providing comments on behalf of the IFPA
9 Organic Committee, which is made up of volunteer leaders in the
10 produce industry who represent a wide array of organic fruits,
11 vegetables, and other specialty crops in many different growing
12 regions. We appreciate the NOSB's consideration of numerous
13 topics and continued review of tools for the National List on
14 the 2025 spring agenda.

15 Although organic seed is not a primary focus of this
16 meeting, I want to take a moment to highlight IFPA's growing
17 commitment to this critical area. Our newly-established
18 Organic Seed Working Group is currently undertaking a
19 comprehensive effort to assess the current landscape of organic
20 seed for fresh produce growers, including availability,
21 quality, and other related challenges.

22 The group's findings will be compiled into a report
23 for the National Organic Program and the Board, with the intent
24 of providing some recommendations and supporting future
25 improvements that strengthen the foundation of organic

1 agriculture. We look forward to sharing this report with you
2 soon.

3 More broadly, we appreciate the NOSB's thoughtful
4 consideration of the proposals and the materials before you
5 this spring. IFPA members continue to rely on several key
6 tools listed on the National List to maintain the viability,
7 sustainability, and integrity of organic production, especially
8 for specialty crops which face unique pest and production
9 challenges.

10 We support the continued listing of materials such as
11 Pear Ester, aquatic plant extracts, and insecticidal soaps,
12 among others, all of which are critical for organic fruit and
13 vegetable production across various growing regions.

14 Finally, we thank the Board for your ongoing
15 engagement with industry stakeholders. IFPA remains committed
16 to working collaboratively with the NOSB and the National
17 Organic Program to ensure organic agriculture remains
18 practical, transparent, and trusted.

19 Thank you.

20 CHAIR BRUCH: Excellent. Thank you so much, Sarah.
21 Really appreciate your time today.

22 I see a hand from Brian. Go ahead.

23 BOARD MEMBER CALDWELL: Yeah, thanks, Sarah. I'm
24 excited to hear that there's this white paper or study or
25 whatever your organization is going to put out about organic

1 seed, and quality and supply, all those critical aspects.

2 We've heard quite a bit from the seed producers but
3 not so much about those issues from -- at least in an organized
4 fashion -- from the growers. So do you have any idea when that
5 report might be out?

6 MS. NEAGU-REED: Yes. Thank you so much for your
7 enthusiasm. Just to provide even more context on this report,
8 we actually put out a survey that went to seed manufacturers as
9 well as growers throughout the United States so that we were
10 able to encompass the perspectives of both parts of the
11 conversation, and we worked collaboratively with ASTA on that.

12 Just because of the expedited nature of having to
13 refocus on the spring agenda, we've had to press pause on our
14 report, but we plan to potentially have it ready and circulated
15 with the program and with you all at some point in later May.

16 BOARD MEMBER CALDWELL: Oh, great. Thank you very
17 much. Appreciate it.

18 MS. NEAGU-REED: You're welcome.

19 CHAIR BRUCH: Thank you, Brian.

20 Go ahead, Nate.

21 SECRETARY LEWIS: Thanks. And apologies if you
22 already mentioned this. I've been having some audio cutting in
23 and out. Have any of your members expressed support for the
24 petition to add ethylene for the storage of organic potatoes
25 and onions, which we're currently reviewing?

1 MS. NEAGU-REED: Yes. We are still in the process of
2 finalizing our comments. But from our conversations with our
3 NOSB working group internally, we do strongly support the
4 proposal to amend the listing of ethylene.

5 SECRETARY LEWIS: Great. Thank you so much. I look
6 forward to reading those written comments.

7 MS. NEAGU-REED: Absolutely.

8 CHAIR BRUCH: All right. Thank you, Nate. Thanks,
9 Sarah. Thanks for taking advantage of the open docket for the
10 written comments still. That's a good plug here for that.

11 Any other questions for Sarah?

12 (No response.)

13 CHAIR BRUCH: Okay. We are going to take a break.
14 We're a little ahead of schedule just because we did have a few
15 members not make their original scheduled time. So hopefully
16 we'll be able to catch them up at the end, so reach out if you
17 know some of these folks that missed their time.

18 But we will return back at 33 past the hour, 15-
19 minute break here. And we have Tom Chapman up with Ramy Colfer
20 next and then Matthew Dillon -- actually, Matthew Dillon
21 canceled. It looks like we have an updated schedule in front
22 of us, Valerie McKinney. So Tom Chapman, Ramy Colfer,
23 Valerie McKinney at 33 past the hour. Thanks.

24 ELECTRONIC VOICE: Recording stopped.

25 (Whereupon, at 3:18 p.m., a brief brake was taken.)

1 ELECTRONIC VOICE: Recording in progress.

2 CHAIR BRUCH: Hi, everybody. Welcome back. We are
3 going to get started again with our session. We have
4 Tom Chapman kicking us off here followed by Ramy Colfer and
5 then Valerie McKinney.

6 Go ahead, Tom. Please state your name and
7 affiliation.

8 MR. CHAPMAN: Can you all hear me? I see the green
9 box. Good afternoon. I'm Tom Chapman, co-CEO of the American
10 Trade Association.

11 MS. ARSENAULT: Sorry, Tom. Amy's camera froze for a
12 second, so please proceed.

13 MR. CHAPMAN: I'm good. I'm back. Can you all hear
14 me?

15 CHAIR BRUCH: Thanks, Michelle. Sorry about that.

16 MS. ARSENAULT: Yep.

17 MR. CHAPMAN: All right. The clock hasn't started,
18 or it's frozen too. Again, I'm Tom Chapman, co-CEO of the
19 Organic Trade Association. I apologize if my comments are
20 disjointed. I thought I would have another ten minutes to
21 practice, but you all are ahead of schedule.

22 So OTA represents the full value chain of actors from
23 farmers to shelf, and we're committed to maintaining integrity
24 while supporting smart growth and efficiency in the organic
25 sector, and I'm here to talk a little bit about the research

1 priorities and risk-based certification proposal.

2 So we submitted or will be submitting written
3 comments in detail on both of these topics. But on the
4 research priorities, a lot of our recommendations in engaging
5 on this topic involve comments that span crops, livestock, and
6 handling. And so we didn't recommend a specific category to
7 put them into, but we are encouraging additional research
8 topics on issues like trade, operating economics, and market
9 data.

10 And just a couple of these topics that we touched on
11 is greater research into imports and exports and the underlying
12 causes for these trade disparities, including in major crops
13 that we're exporters of -- net exporters of -- on the
14 conventional side, but our large net importers are on an
15 organic side, including soybean, corns, and beef.

16 The economics of organic, including the cost of
17 certification, production, and profitability, researching that
18 understands the economic incentives and disincentives including
19 influencing the decision to adopt and maintain organic
20 certification. Regional economic impacts of organic, including
21 the contributions that organic production and supply chains
22 have to employment, income stability, farmer retention, land
23 values, and tax revenue.

24 Market data and supply chain transparency. Reports
25 akin to USDA's World Agricultural Supply and Demand Estimates

1 that USA has been unable to create, but understanding research
2 in the areas of price, inventory, consumption, acreage, and
3 organic production.

4 Further research in the area of organic yield gaps,
5 including system-level productivity, so yield drag is often
6 cited as a challenge in organic systems. We're somewhat afraid
7 to discuss yield because it's not the only area of importance
8 for organic production systems, and yet it still matters quite
9 heavily, so understanding systematic factors that drive yield
10 difference across crops, geographies, and practices. And this
11 would dovetail quite well with, we think, the issues associated
12 with our importing and exporting gaps.

13 And then lastly, research into traceability and
14 supply chain technology, including better leveraging the
15 traceability infrastructure -- that's quite robust under the
16 USDA organic label -- with the organic integrity database, the
17 certification record-keeping systems, and the segregation
18 requirements in organic, and how this could create additional
19 innovation and value for participants in the marketplace,
20 including easier compliance with other compliance requirements
21 like the EUADR regulations and others.

22 On the risk-based certification side, we welcome and
23 appreciate the work of the CACS on this, but we wanted to share
24 some concepts and some feedback. So on the definition of
25 risk --

1 CHAIR BRUCH: Okay. I'm just going to jump in here.

2 MR. CHAPMAN: Oh, I'm already out.

3 CHAIR BRUCH: I apologize. Yeah.

4 MR. CHAPMAN: I'm already out. She cut me off.

5 CHAIR BRUCH: You are. We're running a tight ship
6 here.

7 MR. CHAPMAN: You can defer to our written comment.

8 CHAIR BRUCH: Please submit your comments to the
9 written doc. It is still open.

10 And I'm going to go to Brian here for our first
11 question.

12 BOARD MEMBER CALDWELL: Yeah, thanks very much, Tom
13 and Amy. I was going to suggest the same thing, that I really
14 appreciate the comments for the research priorities, and
15 especially -- seems like a real strong interest in economics
16 and social sciences which is, I think, something that we've
17 been a little light on. So I appreciate that. And please, as
18 much as you can put into those written comments specifically
19 about -- you know, flesh those things out would be great. So
20 thanks so much, Tom.

21 MR. CHAPMAN: Yeah, Brian, we tried to do that. I'm
22 happy to continue the conversation. If we can provide greater
23 clarity in our written comments, that will spell it out in more
24 detail.

25 CHAIR BRUCH: Excellent.

1 I see Carolyn's hand. Carolyn, go ahead.

2 BOARD MEMBER DIMITRI: Hi. Well, you spoke my
3 language here, Tom, with thinking about economic research. So,
4 I mean, another direction that you could take this as the Trade
5 Association would be to write a letter to the Secretary and ask
6 that ERS engage in some of this work because the problem with
7 like university and private sector researchers is that we don't
8 really have access to a lot of the data that you need to do
9 this kind of work. But USDA collects it through their ARMS
10 survey, so I think letting the Secretary of Agriculture know
11 this is really important to the organic community could be very
12 helpful.

13 MR. CHAPMAN: Yeah, Carolyn, so we are -- excellent
14 suggestion -- we are doing those activities. We are finding
15 mixed success in it, and so we wanted to encourage greater
16 avenues for, you know, something like the WSAD report should be
17 completed by USDA. And yet we have been unable to advocate and
18 get that work fully completed, so we wanted to broaden,
19 perhaps, you know, some of these funding buckets that allow for
20 research to allow other avenues for some of this work to get
21 done.

22 But we are both working with Congress and the Farm
23 Bill to try to obligate and fund and require certain activities
24 of the USDA, as well as communicate directly with USDA and
25 advocate for these areas as well, and then this was kind of a

1 third arm for us to focus on.

2 CHAIR BRUCH: Okay. Thanks, Carolyn. Thanks, Tom.

3 I have one quick question for you. It's about a
4 survey that OTA just released information on -- the consumer
5 perceptions of USDA organic -- which citing things, the next
6 generation, these millennials and Gen Z look like they really
7 are embracing the organic industry. We've heard from farmers,
8 integrity, fraud, prevention is really important, but how do we
9 get this market growth? We have this new generation that wants
10 organic. How do we give them more products and expand our
11 markets even greater than \$70 billion?

12 MR. CHAPMAN: Yeah, so, I mean, there's a lot of
13 levers that still need to get pulled here. Some of the
14 research areas we just talked o, touch on some of those. But,
15 I mean, economics is still a big factor, right? So consumers
16 will only pay so much for their food products, and the price
17 premium that organic deserves and calls for in the marketplace
18 is still an obstacle to some consumers.

19 So the education in that area, in terms of
20 understanding why organic is worth the premium, as well as on
21 our own side doing additional research as to what is
22 contributing costs to organic, and making sure that that's done
23 in the most optimal way.

24 So if it costs more because it's a farming practice
25 that's yielding what's required on the standards, that's a

1 rational area. If it's inefficiency in the supply chain
2 because of a certification requirement or something like that,
3 we should understand what those costs are and make sure that
4 we're optimizing that to maximize the value for consumers as
5 they purchase these products.

6 So one is understanding costs. Another is educating
7 on that value. But there's a whole bunch of other levers that
8 we need. We need easier access to organic across all supply
9 chains and all formats of products. We need to have organic
10 foods integrated into food service areas so they have exposure
11 at a younger time point. So there's just a bazillion of
12 activities, Amy, that we're hoping to work on over time to help
13 increase this consumption of organic.

14 CHAIR BRUCH: Okay. Excellent. Tom, thank you for
15 your contributions today. And, yep, just to highlight that
16 written comment doc, it's still open. So thank you.

17 MR. CHAPMAN: Thank you.

18 CHAIR BRUCH: Yep. We'll go to Ramy Colfer next, and
19 then Valerie McKinney and Heather Spalding.

20 Ramy, please state your name and affiliation.

21 MR. COLFER: Hi. My name is Ramy Colfer. I'm VP of
22 Research and Development and Agronomy at True Organic Products.
23 NOSB members, thank you for your dedication to continue to
24 improve organic integrity of organic marketplace. We at True
25 are U.S. leaders in inputs used in organic cropping production.

1 Our mission is to make organics work for a better world.

2 We are grateful for the efforts of the CACS committee
3 to deliver improved resources for organic integrity
4 verification. We continue to advocate for expanding the scope
5 of testing, and commend the content of the CACS proposal for
6 residue testing for a global supply chain. Please reference
7 our previous and upcoming comments on the topic for our full
8 content of our position on this subject.

9 True Organic Products advocates for the acceptance of
10 the CACS proposal as presented. We support the proposal and
11 recommend that NOSB pass this proposal for incorporation by the
12 USDA National Organic Program in a revised NOP handbook
13 instruction. This proposal can add critical tools to our
14 organic certification process and will bolster organic
15 integrity.

16 We have made some specific comments in our written
17 recommendations and our written comments on ways we believe we
18 could optimize the CACS proposal for residue testing. We
19 emphasize the importance of training and proper sampling
20 methods for collecting product and environmental samples. We
21 emphasize updating the pesticide residue testing that includes
22 all pesticides likely to be used in conventionally grown crops,
23 and those are globally grown crops. And we support the
24 proposed revisions NOP 2611-1, including the important note to
25 add substances like synthetic nitrogen.

1 True Organic Products is dedicated to our integrity
2 of organic marketplace, and with some other stakeholders we
3 have achieved a working group with AOAC to further validate
4 organic authenticity testing of both organic products and
5 inputs.

6 We're encouraged to see the bipartisan legislation
7 introduced by Senators Pete Ricketts, and Tina Smith, the
8 Organic Inputs Verification Act to help protect U.S. organic
9 farmers from fraudulent organic imports. Legislation such as
10 this will improve confidence in the organic label.

11 And on that note, we would like to publicly emphasize
12 our continued support for full staffing at the National Organic
13 Program in order to maintain integrity and the veracity of the
14 USDA organic seal.

15 Thank you, and Happy Earth Day.

16 CHAIR BRUCH: All right. Ramy, thank you so much for
17 your time today.

18 Any questions for Ramy?

19 (No response.)

20 MR. COLFER: All right.

21 CHAIR BRUCH: Hey, I actually have one.

22 MR. COLFER: Okay.

23 CHAIR BRUCH: I just wanted to see if you wanted to
24 provide the Board with an update. At our last public comment
25 period, you were tasked with a homework assignment of just

1 looking into mass balance information on nitrogen for some of
2 the top ten crops that we import. So any insight you'd like to
3 convey to the Board here briefly?

4 MR. COLFER: You know, we have worked on that, and,
5 yeah, I think it gave us some pretty tremendous insights. I
6 don't have specific numbers in front of me but, yeah, there is
7 a lot of inputs that would be required to deliver some of the
8 inputs of some of the crops that are imported, especially in
9 that top ten list.

10 I think one in particular that Frank Austin mentioned
11 is organic bananas. It would require a tremendous amount of
12 domestic inputs within those countries in order to grow that
13 amount of imported organic banana. But I'd be happy to share
14 those documents with the Board if we could schedule a time.

15 CHAIR BRUCH: Thank you, Ramy. Yeah, if there's a
16 way to also post anything in the written comment docket that's
17 still open, we encourage that as well.

18 MR. COLFER: Okay. Thank you.

19 CHAIR BRUCH: Okay. Yeah. Thanks so much.

20 I'm not seeing any other hands. We're going to keep
21 moving on to our next speaker. We have Valerie McKinney,
22 Heather Spalding, and then Kathie Arnold.

23 Go ahead, Valerie.

24 MS. MCKINNEY: Can you hear me?

25 CHAIR BRUCH: Yes, we can. And please state your

1 name and affiliation.

2 MS. MCKINNEY: Perfect. Thank you. Hi, my name is
3 Valerie McKinney, and I'm the Field Development Coordinator and
4 Regulatory Fair Specialist for Trace, Incorporated, and I'm
5 here for support of a petition for Pear Ester. So a little bit
6 about the company. Trece, Incorporated is a company that
7 creates insect pheromones and pheromone-based products designed
8 to respond to customer needs, protect food production, and
9 preserve the environment.

10 Coddling moth is a significant economic pest
11 globally, and if it's left uncontrolled, it can destroy entire
12 crops. For nearly 20 years, our monitoring and mating
13 destruction products have been relied on for organic growers as
14 an additional IPM tool against coddling moth.

15 Our Pear Ester pheromone is unique from other
16 monitoring and mating destruction products because we don't
17 only have to disrupt the male coddling moth, we're also able to
18 disrupt the female coddling moth with the addition of Pear
19 Ester. There are many mating disruption products out there on
20 the market today, but a lot of them -- actually none of them
21 contain Pear Ester.

22 Because our monitoring products do contain Pear
23 Ester, it allows for growers to be able to track phenology and
24 have proper spray timing of pesticides. The monitoring mirrors
25 are housed in a trap and do not come in contact with the fruit.

1 I would like to note that our mating disruption
2 products are called solid passive dispensers, so the pheromone
3 is released as a gas. We do have one micro-encapsulated
4 product that's called DA MEC, and this is a larval disruptor.

5 So Pear Ester is the odor that you smell from
6 Bartlett pears. This synthetic substance is identical to the
7 natural substance that you find in pears and other fruit that
8 may contain Pear Ester. This compound is ubiquitous in nature.

9 It is an approved additive listed by the U.S. Food
10 and Drug Administration on everything added to food in the
11 United States. The average intake of Pear Ester reported by
12 the Joint Food and Agricultural Organization of the U.S. World
13 Health Organization Expert Committee on Food Additives is
14 34 micrograms in Europe and 3 micrograms in the United States.
15 Pear Ester has also been exempt from the requirement of
16 tolerance by EPA.

17 And for my last comments, I'd like to stress that
18 this compound is a valuable tool for organic growers. And
19 please take a look at my written comments to have a more in-
20 depth view of our products. I've placed pictures and tables
21 within the written comments.

22 And thank you very much for your time.

23 CHAIR BRUCH: Thank you, Valerie, for your oral
24 comments just now and the written ones you mentioned that you
25 submitted. Really appreciate those.

1 Any questions from the Board?

2 I see Franklin. Go ahead, Franklin.

3 BOARD MEMBER QUARCOO: Okay. Can you hear me?

4 CHAIR BRUCH: Yes, we can.

5 BOARD MEMBER QUARCOO: Can you hear me?

6 CHAIR BRUCH: Yes, perfect.

7 BOARD MEMBER QUARCOO: Good. Valerie, thanks so much
8 for your comments. Can you throw a little bit more light on
9 your microencapsulated product and how it's deployed?

10 MS. MCKINNEY: So the microencapsulated product is a
11 sprayable, but it only goes on -- it's .3, I think, fluid
12 ounces per acre. So just to give you a regular background, an
13 orchard background of Pear Ester, it normally has 3.712 grams
14 per acre per month. That's the normal amount in a normal
15 orchard. The CIDETRAK DA MEC that's being released is
16 1.2 grams per acre per month, So it's way below even what the
17 natural orchard would have.

18 Another item you asked about how it's being sprayed.
19 Again, it's at .3 fluid ounces per acre, and you would just mix
20 it in with a spray tank. You don't add additional. It's just
21 the one per acre. And then we don't say to spray to runoff.
22 We don't recommend that. And, again, everything's
23 encapsulated. It's being released. I think that's all. I'm
24 trying to think of everything. It's more detailed in my
25 written comments, exactly.

1 BOARD MEMBER QUARCOO: Thanks. I got the information
2 there.

3 MS. MCKINNEY: Okay. Perfect.

4 BOARD MEMBER QUARCOO: Thanks, though.

5 CHAIR BRUCH: Yeah, thanks, Franklin, for that
6 question.

7 Any other questions for Valerie?

8 (No response.)

9 CHAIR BRUCH: Valerie, I wanted to have you respond.
10 There's some members in the community via written comment
11 submittal that look to be in favor of Pear Ester if it's in the
12 trap. You mentioned your company does have other mechanisms.
13 There is some concern with Pear Ester with the
14 microencapsulation due to microplastic contribution. I wanted
15 to give you a chance to weigh in on that. And then also I
16 wanted you to comment, there was a request from the community
17 to maybe look at an annotation that says we would allow forms
18 that are identical with natural Pear Ester, you know, just so
19 we wouldn't have something that's more concentrated than that.
20 So can you talk on those two elements a little deeper?

21 MS. MCKINNEY: I'm not quite certain on the natural.
22 I'm assuming they don't want it synthetically produced.

23 CHAIR BRUCH: Just that it wouldn't be in a
24 concentration greater than what's available in a natural
25 substance.

1 MS. MCKINNEY: Okay.

2 CHAIR BRUCH: So the concentration piece and then the
3 microencapsulation.

4 MS. MCKINNEY: So the CIDETRAK DA MEC, it is -- like
5 I said earlier -- it's way below what a natural orchard would
6 have, 3.712 grams per acre per month, and the CIDETRAK DA MEC
7 releases 1.2 grams per acre per month. The rest of the
8 products, the solids, they release -- it's a gas, again -- they
9 release 4 to 2.85 grams per acre.

10 I did mention that this is approved by the FDA. So
11 we also eat the chemical. It's in confectionaries, it's in
12 flavored liquors, things like that.

13 The monitoring lures are in traps, they're housed,
14 and I put pictures in the written comments as well. A lot of
15 the DA doesn't have a long field life, so it degrades fairly
16 quickly. Yeah, it's extremely highly volatile, and due to the
17 use pattern -- so Pear Ester has a volatility of 7.54 times 10
18 to the negative 4. For Henry's Law of Constants, the value of
19 high volatility is estimated -- this is all in my written
20 comments. We don't recommend runoff.

21 What were the other questions? I'm sorry.

22 CHAIR BRUCH: Sorry about that, Valerie. The main
23 one was just in terms of concerns with maybe microplastics.
24 But you did a good job of kind of talking about the
25 concentration, and we'll definitely refer to your written

1 comments for sure. So thank you.

2 MS. MCKINNEY: Okay. Yeah, and if you need us to
3 look into microplastics, I didn't do much research for the
4 microplastics. I did a lot for just, yeah, Pear Ester.

5 CHAIR BRUCH: If you definitely have time, that would
6 be great. I know that's a question of the community in regards
7 to the substance, so any additional information you can supply
8 in the written comment doc would be great.

9 MS. MCKINNEY: Okay.

10 CHAIR BRUCH: All right.

11 MS. MCKINNEY: Thank you.

12 CHAIR BRUCH: Thanks, Valerie. Really appreciate
13 your time.

14 Thanks, Franklin, for your question.

15 We'll move on to Heather Spaulding, followed by
16 Kathie Arnold, and then David Gould.

17 Go ahead, Heather. State your name and affiliation.

18 MS. SPALDING: Good afternoon, and Happy Earth Day,
19 Chairwoman Bruch and members of the NOSB. I'm
20 Heather Spaulding, Deputy Director of the Maine Organic Farmers
21 and Gardeners Association, MAFGA. Currently, we certify 520
22 organic farms and processing operations. We have more than
23 15,000 members. We're also a member of the National Organic
24 Coalition.

25 I really appreciate the opportunity to comment today.

1 We're going to submit written comments on several items, but I
2 just wanted to touch on two topics in particular: compost
3 feedstocks, and inerts.

4 So we urge you to deny the petition to allow
5 synthetic compostable materials. Until we turn off the tap of
6 persistent and bioaccumulative chemicals in the food and
7 agriculture system, compost feedstocks should include only
8 plant and/or animal products.

9 Farmers across the country are struggling with soil,
10 water, crop, and livestock contamination from per- and
11 polyfluoroalkyl substances, PFAS. In Maine, many farm families
12 and their neighbors have been directly -- and in some cases
13 devastatingly -- affected by land application of PFAS-
14 contaminated biosolids. And because of that experience, in
15 2022, Maine banned the land application of sewage sludge
16 biosolids and commercial fertilizer manufactured from these
17 materials.

18 We've also adopted a plan to phase out the use of
19 PFAS pesticides which are known to add to the contamination
20 loads of farms, and we know that PFAS and other synthetic
21 contaminants are present in many products described as
22 compostable. We should take a precautionary approach to the
23 materials that we allow for continuous improvement of our soil
24 health.

25 Regarding the EPA list for inerts, MOFGA supports

1 individual listings for each allowed inert as required by OFPA.
2 Inerts often comprise the majority of a pesticide formulation,
3 and sometimes are more toxic than the product label's active
4 ingredient. The public should have the right to know what it
5 is being exposed to. Organic consumers want to know that
6 USDA's certified organic label does not allow harmful
7 pesticides or materials to be used in production.

8 I testify on a wide range of policy initiatives in
9 the Maine legislature, and I often hear a troubling and
10 misleading message fanned by the pesticides industry asserting
11 that organic growers use pesticides more toxic than those
12 relied upon by the conventional ag sector. We have to do more
13 to set the record straight on this spurious accusation.
14 Transparency with EPA's list for inerts is a critical step in
15 that direction, recognizing that the individual listing
16 approach is more demanding of staff resources. More
17 critically, it would ensure that we're minimizing contamination
18 of the organic food system, our bodies, and the broader
19 community.

20 CHAIR BRUCH: Is anybody else having trouble hearing
21 Heather? Oh, Heather, sorry, I lost your just previous
22 sentence. Do you mind?

23 MS. SPALDING: Okay. Sure. And I live in rural
24 Maine, and I have really limited bandwidth. So basically I was
25 just wrapping up and just thanking you for the efforts that

1 you've put in, and I'll be submitting written comments.

2 CHAIR BRUCH: Okay. Excellent. Sorry to interrupt
3 you, Heather. I want to make sure we heard everything you were
4 transmitting to us. Thank you for your leadership.

5 Any questions for Heather? I see one from Logan.

6 Logan, go ahead.

7 BOARD MEMBER PETREY: Hi. Thanks, Heather. The
8 statement stating that organics use more toxic pesticides, do
9 they give an example of what pesticide would be considered more
10 toxic compared to what conventionals are using? I mean, just
11 the labels themselves with the toxicity labels, I think that
12 that's pretty indicating of toxicity.

13 MS. SPALDING: Yeah, yeah, absolutely. It's just
14 it's a messaging problem, right, and I think that it's
15 compounded by the challenge of, you know, inerts generally.
16 One of the challenges we had years ago when late blight was a
17 big concern in Maine -- this is probably 15 years ago now --
18 there was, you know, conventional ag folks were saying that
19 organic producers were using way too much copper and that the
20 potatoes were blue, you know, and it's just it's not true.
21 These are spurious allegations.

22 But I guess the point I'm trying to make is that
23 often when we say that there are mechanical and cultural
24 practices and safer materials that can be used, the
25 conventional growers will say, well, if we have to do that,

1 we're just going to have to use way more applications of
2 pesticides and sometimes those pesticides are very harmful and,
3 in fact, more dangerous when you consider the quantities. So
4 it's a concern, you know, across the board. We will definitely
5 say that people should not be using pesticides
6 prophylactically. They should be, you know, using true
7 ecological pest management, integrated pest management that is
8 ecologically sound. But I think that if we were able to
9 address the challenges of inerts, it would help us strengthen
10 our case.

11 BOARD MEMBER PETREY: Thank you.

12 MS. SPALDING: Mm-hmm.

13 CHAIR BRUCH: Excellent. Heather, thanks for
14 highlighting those educational needs that we need to work on
15 for our community.

16 Any other questions, comments for Heather?

17 (No response.)

18 CHAIR BRUCH: All right. We're looking forward to
19 reading your written comments as well. Thanks again.
20 Take care.

21 MS. SPALDING: Thank you.

22 CHAIR BRUCH: We have Kathie Arnold next, followed by
23 David Gould, and then Sam Welsch.

24 Kathie, please state your name and affiliation. I'm
25 having trouble hearing you, Kathie.

1 MS. ARSENAULT: Nope. We still can't hear you,
2 Kathie. So many microphones and speakers, I know.

3 MS. ARNOLD: Now?

4 CHAIR BRUCH: Oh, yeah. Oh, now we got you. Yeah.

5 MS. ARNOLD: Okay.

6 CHAIR BRUCH: Nice troubleshooting, Kathie. Thank
7 you.

8 MS. ARNOLD: Yeah. Well, our power was off this
9 morning, went off twice, so maybe it messed things up. I
10 didn't even think to check.

11 CHAIR BRUCH: No worries.

12 MS. ARNOLD: Okay. Thank you.

13 Good afternoon, everybody. Kathie Arnold here, co-
14 owner and operator with my son at Twin Oaks Dairy LLC in
15 Truxton, New York, where we've been shipping certified organic
16 milk for 27 years as of next month. Thank you for the
17 opportunity to comment.

18 I support the previous comments made by Ed Maltby and
19 Lia Seiler, Executive Directors of NODPA and WODPA, but today I
20 want to specifically speak for the relisting of flunixin.
21 Although we rarely use it, when it is needed, there are really
22 no alternatives that have the same and often dramatic effect
23 that flunixin does.

24 We had two lactating cows this past winter, one with
25 a fever of 107 and another with 106 degrees. One of our vets

1 explained that untreated, uncontrolled high fever can lead to
2 lack of appetite, increased respiratory and heart rates -- and
3 the discomfort that both of those things bring -- and wasting
4 due to increased energy use and anorexia. We used flunixin on
5 both of our high fever cows, and by the next morning both of
6 their temperatures were back down to the normal 102 degrees.
7 Both Wage and Buki recovered and are doing well.

8 Our vet also says flunixin can be utilized to reduce
9 inflammatory pathways often involved in toxic E. coli mastitis
10 that can induce endotoxemia and sepsis. Additionally, it is
11 helpful for pain mitigation for multiple types of pain,
12 including musculoskeletal, visceral -- such as abdominal
13 infections and enteritis -- and in soft tissue such as foot rot
14 and mastitis. Without the application of an analgesic,
15 uncontrolled pain can lead to depression, anorexia, and
16 decrease in daily gains in livestock. I hope you agree with
17 the necessity of flunixin being relisted, especially given the
18 FDA recently prohibited the use of aspirin for livestock.

19 Thank you for listening and for your consideration.

20 CHAIR BRUCH: Kathie, thank you so much for your time
21 today. It's really important to hear the voices of your
22 community, so I appreciate this real information exchange with
23 the Board.

24 Any questions for Kathie?

25 (No response.)

1 Kathie, I'm not seeing any, but I really appreciate
2 it and wishing you a really good season.

3 MS. ARNOLD: Well, thank you. Appreciate it.

4 CHAIR BRUCH: You're welcome.

5 All right. We have David Gould, followed by
6 Sam Welsch, and then Doug Currier.

7 David Gould, can you please state your name and
8 affiliation?

9 MR. GOULD: Yeah. Thanks, Amy. Thanks to the entire
10 Board for your work. Thanks for hearing me today. My name is
11 David Gould. I have two affiliations that I want to share with
12 you. One is as the General Secretary of the iPhone seeds
13 platform, and the second would be more my generic organic hat
14 of somebody who has been involved in certification inspection
15 accreditation for the past 30 years. And first I'm going to
16 talk about seeds, and then I'm going to talk about risk-based
17 certification.

18 About seeds, my big-picture concern is that we seem
19 to be unable as a sector to grow the amount of organic seeds
20 being used. And this is a shared benefit that we all have, but
21 it is not a shared responsibility. It's all put on,
22 essentially, the upstream parts of the chain to make it all
23 happen, and there's not enough pull on that chain.

24 So we also, I think, can say pretty safely after all
25 these years that commercial availability doesn't work. It

1 doesn't have enough teeth, hasn't been successful no matter how
2 hard we try, talk about it. So I would like to propose sort of
3 maybe a little out-of-the-box proposal for the Board to
4 consider, which is put some of the responsibility downstream.

5 An organic handler who requires a non-organic seed
6 should be given a noncompliance. There should be some way to
7 phase it in so that we can actually pull on the chain more,
8 have some more skin in the game to make it so that there is the
9 financial incentive to make the upstream parts of the chain be
10 able to supply.

11 This is an existential issue for all of us, and the
12 other side of the organic seed coin would be the increasing
13 prevalence of genetically engineered varieties or varieties of
14 excluded methods, and I will repeat my plea to the NOSB to put
15 pressure on the USDA to protect the organic sector and ask the
16 right questions to make sure that any environmental releases
17 are done in a sound way, and I can't help but put the link to
18 our risk protocol in the chat again here. I submitted it as
19 part of the public record last time around in the last meeting.

20 Okay. Now I'm going to pivot to risk-based
21 certification, and I want to say just a few basic things about
22 that. One is that I think we have to really take a hard look
23 at how much time we're allowing for inspections.

24 For complicated inspections, they need to be longer.
25 Sometimes one day is not enough to actually get enough

1 assurance or do enough checking, compared to a food safety
2 inspection that a big handler would have to do. They spend two
3 or three days and spend thousands of dollars more, and they
4 don't seem to bat an eye about it, and I think we have to take
5 that into consideration and be a little bit more serious about
6 what we're expecting out of an organic certification.

7 The other thing that I think would help certifiers
8 quite a bit would be a common risk matrix that is developed by
9 NOP with the organic certifiers that has some very sensible
10 kinds of risks in it, with the basic idea being the higher risk
11 you are, the more inspections you get and the longer it takes.
12 This is something which has been done before over the years,
13 and so we don't have to reinvent the wheel. We just have to do
14 it.

15 Thanks.

16 CHAIR BRUCH: Thank you, David. Really appreciate
17 your comments.

18 Allison, go ahead.

19 VICE CHAIR JOHNSON: Thanks for your comments, David.
20 The handler role in seed sourcing is something we've been
21 giving a lot of thought to, including the suggestion you just
22 made, and I'm curious if you have any more specific thoughts on
23 how far we could go in requiring a handler to change formulas,
24 experiment with new varieties.

25 You know, if there's a product on the market that has

1 a certain composition with a certain variety of an ingredient,
2 how far can we go in requiring them to explore changes to that
3 formula in order to increase organic seed use?

4 MR. GOULD: I think we can go pretty far, actually.
5 It's really a question of is there supply, and if there is -- I
6 have worked with seed producers over many years, and the common
7 response -- and this is a little bit of a gross approximation
8 -- but show us the money and we'll give you the seed.

9 And I tend to be of the mind that just because
10 there's a conventional analog on the shelf doesn't mean there
11 has to be an exact organic analog in that. I understand, you
12 know, the commercial pull for that, but I think that we can
13 adapt our organic products to the organic varieties we have and
14 the characteristics that they have. And it may be that to put
15 that kind of pressure on a handler is not something that can
16 happen in a year, but it could be something that could be
17 phased in over time where there is some agreed work plan and
18 connection to the upstream parts of the chain.

19 Part of the problem is that we have essentially no
20 interdependence mandated across the chain. There's got to be
21 some way to say that maybe part of your compliance plan would
22 be to develop the kind of relationships to be able to assure
23 that you have some supply, and that it's starting to work with
24 those seed producers and breeders to be able to develop the
25 characteristics you want.

1 CHAIR BRUCH: Thanks, David. Appreciate your
2 response there.

3 Quick question on seed. You mentioned seed
4 commercial availability. I just want to know your perspective
5 quickly on our program, the global program. You know, we have
6 countries of all -- we have First World, Third World, and
7 everything in between participating in this global program.
8 How do we influence development of organic seed, essentially,
9 overseas at the level that it's happening here on our shores?

10 MR. GOULD: It seems to be happening in very much the
11 same kind of way. I mean, the difference that I see is in
12 scale, depending on geography, right? The scale and the crop.
13 Most of the crops that we're importing are commodity crops that
14 tend to be grown on a larger scale, although there are some
15 specialty crops that are made maybe to process products that
16 we're receiving as well.

17 I don't see that much difference really, in the
18 methodologies or the kinds of dynamics that are needed to be
19 able to provide a breeder with the resources to continue to
20 develop their varieties, but it's a longer supply chain than
21 that. And what's needed in between from the breeder is to get
22 somebody who can actually multiply that seed at enough scale to
23 be able to provide a farmer with enough crop that can provide a
24 handler with enough ingredient to do it.

25 And so what's important is that we're able to build

1 the supply chain at each of those stages. And, you know, what
2 they say about a chain is you can't push it, you can only pull
3 it, right? And so that's really, I think, where we need to
4 share that responsibility, and not only the responsibility, but
5 also probably the risk that some of these farmers take to try
6 and actually produce these seeds. And the clock's running.

7 CHAIR BRUCH: Thanks for your insight, David.
8 Appreciate your time here today.

9 MR. GOULD: Thank you.

10 CHAIR BRUCH: All right. We're going to move to our
11 next speaker. We have Sam Welsch, followed by Dave Currier and
12 Chelsey Lenczyk.

13 Go ahead, Sam, please state your name and
14 affiliation.

15 MR. WELSCH: Yes. My name is Sam Welsch. Are you
16 able to hear me?

17 CHAIR BRUCH: Yes, we are.

18 MR. WELSCH: Good. I'm founder of OneCert in the
19 U.S. and OneCert International in India. It was an auspicious
20 day on Earth Day 22 years ago when OneCert was granted USDA
21 accreditation. I'm grateful for Beth Hayden's advice to focus
22 on the law and the regulations when developing OneCert's
23 quality system. That focus allowed us to obtain accreditation
24 in record time.

25 I was and still am very passionate about fulfilling

1 the core purpose of OFPA, ensuring that organically produced
2 products meet a consistent standard. When the NOP was
3 implemented, my family's farm had already been certified for
4 10 years. This mission is deeply personal.

5 From the beginning, it was clear that consistent
6 interpretation of these standards was not universally shared.
7 The absence of a unified methodology for interpreting the law
8 and regulation led to many inconsistencies. When I discovered
9 the principles of textual interpretation used in the legal
10 field, it was obvious that following such principles would go a
11 long way to improving consistency.

12 When I first submitted comments on hydroponics in
13 2008, the NOP maintained that hydroponic operations could only
14 be certified if they adhered to the existing laws and
15 regulations. The law clearly states that an organic plant
16 shall contain provisions designed to foster soil fertility,
17 primarily through the management of organic content of the soil
18 through proper tillage, crop rotation, and manuring. This
19 requirement is further reinforced by multiple regulations that
20 are specifically designed for soil-based agriculture. A
21 soilless system cannot comply with those regulations.

22 Currently, the NOP asserts that soil requirements
23 only apply to operations growing crops in soil. Obviously, the
24 NOP would not need to make that assertion, as soilless
25 production could actually comply with the law and regulations.

1 Neither the law nor the regulations mention hydroponics.

2 Had Congress intended an exception for hydroponic
3 operations, it could have been included in OFPA. It uses the
4 word except 23 times, while the regulations uses it 64 times.
5 How can the USDA genuinely strengthen organic enforcement while
6 making arbitrary decisions that disregard the very laws it is
7 supposed to uphold? Lost my place, sorry.

8 What implications does that have for the future?
9 Will pasture requirements only apply to operations with
10 pasture? Will organic ingredient requirements only apply to
11 those sourcing organic ingredients?

12 One survey received a noncompliance notice from the
13 NOP for quoting the law to inform applicants that soilless crop
14 production does not comply. Our rebuttal submitted over three
15 years ago remains unanswered. The NOP tells me that the issue
16 is still under consideration.

17 If the NOP used legal principles of interpreting
18 text, there would not be an issue because they would enforce
19 the law and the regulations as they are written. That is the
20 only way we will achieve consistency.

21 I want to add that risk-based certification should
22 focus on better detection of high risk. There is no such thing
23 as low risk.

24 CHAIR BRUCH: Okay. Thank you, Sam. I appreciate
25 your time here today.

1 Are there any questions for Sam?

2 (No response.)

3 CHAIR BRUCH: All right. Thanks again for your
4 contributions to our community. Have a nice day, Sam.

5 MR. GOULD: Thank you.

6 CHAIR BRUCH: We'll move on to our next speaker. We
7 have Doug Currier, followed by Chelsey Lenczyk, and
8 Abby Youngblood.

9 Go ahead, Doug. Please state your name and
10 affiliation.

11 MR. CURRIER: Hi, everyone. My name is Doug Currier.
12 I'm the Technical Director at the Organic Materials Review
13 Institute, where we strive to make organic easier. We are a
14 third-party material review organization.

15 So, before commenting on spring agenda items, I want
16 to take a moment and put into the public record appreciation
17 and gratitude for the work of this Board to address work items
18 stemming from conflicting materials decisions. This Board's
19 work to classify and lift the family end and agricultural end
20 to tackle the standard for ion exchange filtration technology
21 has helped resolve gray areas for NOP and for industry.

22 The Board will be asked to take up another issue,
23 which stems from a petition submitted by our organization to
24 amend the National List annotation for chlorine materials at
25 205.603, depending on whether these materials are allowed as

1 direct livestock drinking water treatments, offering up thanks
2 in advance for the Board's attention when that work item comes
3 your way.

4 In the remaining time, I want to draw attention to a
5 few items that are in our written comments submitted yesterday.
6 I'd like to encourage the NOSB to consider pursuing a standard
7 for insect management, a clear standard for organic insect
8 production, and help the current NOSB research priority for
9 black soldier fly larvae as a source of methionine. Insects
10 are agricultural, and OMRI and many others in the industry have
11 policies that insects must be organic when fed to livestock.

12 I want to take time to voice support for redefining
13 UREC. Concern was noted by us continuing to include the term
14 background in the definition without the important clarifiers,
15 naturally occurring or synthetic chemicals. This might get in
16 the way of the improvement the Board is trying to make.
17 If a decision is made to exclude those clarifiers, we need a
18 suggestion about replacing the background with trace.

19 And one final point here is I feel like there's
20 uncertainty around what type of baseline soil testing is
21 performed by growers and/or certifying agents during a three-
22 year transition to establish a snapshot of naturally occurring
23 contaminants or synthetic residues that might be present. You
24 know, taking a snapshot in time is important in providing
25 context to results that might come in at a later date.

1 And finally, I want to submit a concern that a
2 commercial availability restriction placed on synthetic malic
3 acid might be ignored, given that the non-synthetic
4 alternatives are not known to exist. It could just be a common
5 problem that applies to all substances that have this
6 restriction, but still it is a concern that we have identified.

7 We also wanted to note that, as of January 2023, we
8 have one non-synthetic malic acid product on our list, and I'm
9 attempting to speak with the contact of that company to learn
10 more about their production capacity potential. I have not yet
11 had a chance to talk to them. I wanted to point that out.

12 Thank you for the time. I'm glad to see this meeting
13 taking place. It's very important.

14 CHAIR BRUCH: Thank you, Doug. Appreciate your
15 comments.

16 MR. CURRIER: Sure.

17 CHAIR BRUCH: Thanks for touching on a lot of
18 different subjects.

19 Is there any questions from the Board?

20 (No response.)

21 CHAIR BRUCH: I'm not seeing anything, Doug.
22 I do appreciate -- I need to dive into your written comments
23 here. I will plan on doing that before our meeting -- but I
24 really do appreciate the thought on getting baseline residue
25 sample data from the land that's in the transition process,

1 just to have comparative analysis, so that's really important.

2 MR. CURRIER: Yeah.

3 CHAIR BRUCH: Yeah, thank you. Residue testing can
4 be used in a lot of different ways, so thanks for highlighting
5 that.

6 MR. CURRIER: Sure. All right. Thank you.

7 CHAIR BRUCH: Yep, thanks for your time, and we will
8 keep moving on to our next --

9 VICE CHAIR JOHNSON: Wait, Amy. Sorry, it's me
10 again.

11 CHAIR BRUCH: No, I'm glad. I'm glad we have a
12 question from you, Allison. Go ahead.

13 VICE CHAIR JOHNSON: Thank you. I was just having
14 trouble hearing when you said you had some concerns about the
15 L-malic discussion. What was the concern?

16 MR. CURRIER: Yeah, just that the restriction is
17 going to get ignored, and sort of acknowledging that that might
18 just be part of this ongoing conversation about commercial
19 availability. But, you know, I think the TR in 2019 was pretty
20 clear about how far out the non-synthetic option is -- although
21 it looks like we do have one on our brand-name products list --
22 but how dominant that synthetic manufacturing route is. And so
23 just a general concern about something getting ignored and, you
24 know, the environment around commercial availability and
25 ignoring that.

1 VICE CHAIR JOHNSON: Okay. So the preference for use
2 of non-synthetic might not have a lot of teeth to it, but
3 wouldn't be necessarily harmful.

4 MR. CURRIER: Yeah.

5 VICE CHAIR JOHNSON: Okay. Thank you. Appreciate
6 your comment.

7 MR. CURRIER: Yeah.

8 CHAIR BRUCH: All right. Any other questions for
9 Doug?

10 (No response.)

11 CHAIR BRUCH: Not seeing anything. Okay. Thanks for
12 your time again.

13 We'll move on to Chelsey Lenczyk, followed by
14 Abby Youngblood, and then Alan Lewis. And just a reminder,
15 those that were missed in the first round of calling your name,
16 we'll probably look to call you here at the latter part of the
17 hour, so I wanted to make sure, you know, that word spreads.

18 Go ahead, Chelsey. Appreciate your time.

19 MS. LENCZYK: Great. Thank you.

20 Hello. I'm Chelsey Lenczyk, Organic Lead for Bejo
21 Seeds Inc., a breeder and producer of vegetable seeds for the
22 commercial market grower and home garden segments in North
23 America. This year BSI celebrates our 20th anniversary of
24 being USDA-certified organic.

25 Thank you, Board and NOP, for the countless hours

1 that you dedicate to critical organic matters, and for the
2 opportunity to speak here today as well as submitting our
3 written comments.

4 Despite being an original tenet of National Organic
5 Program regulations, organic seed usage has stagnated. We
6 applaud CACS for exploring consistency in organic seed use. I
7 am proud to co-Chair the Organic Trade Association Seed Task
8 Force, and as such, I hope to inform you today on our
9 activities spotlighting initial ideas coming from private
10 sector and to hold open a path for future collaboration.

11 The OTA Task Force has a wide net of organic seed
12 stakeholders, including organic breeders, suppliers,
13 certifiers, grower-shippers, liaisons from organic advocacy
14 groups, and expert organic advisors. We are committed to
15 strengthening the role of organic seed in organic production
16 through collaborative, practical, and forward-thinking
17 solutions.

18 Recognizing the importance of organic seeds, the
19 integrity of the USDA organic label, we seek to address
20 challenges in seed availability, enforcement, and market
21 development. We aim for a strategy that can move towards
22 maximum seed usage in organic production in a sensible and
23 predictable manner. Participating members of the task force
24 commit to upholding the following guidelines: ensuring that our
25 work remains focused, actionable, and beneficial to the broader

1 community. One, organic seed is the foundation of organic
2 agriculture; two, practical and enforceable standards; three,
3 market-driven and data-backed decision-making; and four,
4 commitment to continuous improvement. As the task force
5 reconvenes for 2025, we expect to move forward with
6 subcommittees focused on these following four areas.

7 One, data collection. Examine what data is available
8 and can be collected to help us better understand organic
9 acreage and seed usage, what data is still needed, and what are
10 the necessary resources for collecting, aggregating, and
11 distributing the end results.

12 Organic seed availability resource. Determine if an
13 availability resource is necessary. If yes, what are the
14 potential holds and resources needed for it? And if no, what
15 could replace it?

16 Commercial availability. Supply versus demand
17 economics, as we've heard today. Given the current
18 regulations, assess if it is possible for the equation to be
19 flipped from supply-driven to demand-driven.

20 And crop focus. Analyze mechanisms for assessing and
21 increasing organic seed usage, including crop-by-crop approach,
22 risk-based approach, crop expert groups, and incentivization.

23 With this work, we hope to support the great efforts
24 of the NOSB and NOP in cultivating a strong and sustainable
25 work model for the future.

1 Thank you for your time and all that you do to uphold
2 the authenticity of USDA Organic.

3 CHAIR BRUCH: Excellent. Thank you, Chelsey.
4 Appreciate your proactive work there.

5 Questions from the Board? I see one from Brian.
6 Go ahead.

7 BOARD MEMBER CALDWELL: Yeah, thanks, Chelsey. I
8 know that I really appreciate Bejo's excellent seed selections
9 and offerings.

10 But I want to ask about, there have been some
11 comments -- or one comment in particular -- about increasing
12 the downstream pull for organic seed, and I think it was
13 particularly focused on our larger scale operations. And what
14 I'm wondering is -- I'm not in the middle of all this
15 conversation -- but I'm assuming that a buyer may specify a
16 very specific seed variety that they want to be grown by their
17 growers. And I'm also assuming that if the organic seed
18 producers could connect with them, that they would be able to
19 produce enough seed, especially with some kind of guarantee of
20 the market of the sales for that.

21 So are there intellectual property issues with it
22 that people don't want to share their prize varieties or their
23 known performers? What's hanging us up? Why don't these
24 groups get together and just figure this out? Maybe it's just
25 price. I don't know. But if you could elaborate, I'd

1 appreciate it.

2 MS. LENCZYK: Sure. Yeah, thanks, Brian. I mean I
3 think all of the reasons that you listed really could be at
4 play. You know, I'll bracket this with the fact that there are
5 certainly going to be some crops that are more difficult or
6 even potentially impossible to produce organically just because
7 of, you know, real challenges in cultivation.

8 I wouldn't say carrots are impossible, but I would
9 give them as an example of a crop that's been really difficult
10 to reach quality levels that are demanded by commercial growers
11 due to lygus infestations all over the world in prominent
12 carrot production areas. So kind of shelving that, that we
13 have to first assess what crops are actually a good fit for
14 organic seed production.

15 After that, I would go to, you know, market demand.
16 If a seed breeder and producer knows that there is a market for
17 organic seed, there are contracts willing to be placed for that
18 organic seed production and that organic seed purchase, I have
19 a hard time imagining that organic seed couldn't then be
20 produced and made available. I think it's the lack of desire
21 and demand on some of those crops that doesn't lead to the
22 actual seed being produced.

23 And to your point, I mean, price, you know, price
24 isn't supposed to be an issue. It's in the background, for
25 sure.

1 BOARD MEMBER CALDWELL: Thanks, Chelsey. I really
2 appreciate -- you know, this is such a complicated issue. It
3 feels like we have strings that we can pull but we just kind of
4 don't have the right grip on them or something, but I really
5 appreciate that.

6 MS. LENCZYK: Yeah. Thank you. I agree.

7 CHAIR BRUCH: Thanks, Brian, for your question.
8 Thanks, Chelsey, for your time today.

9 We're going to keep moving down the list here to
10 Abby Youngblood, then Alan Lewis, followed by Mike Schulist.

11 So, Abby, go ahead. State your name and affiliation.

12 MS. YOUNGBLOOD: Good afternoon. Happy Earth Day.
13 Congratulations, and thank you, Amy, for keeping us on track
14 this afternoon. I'm Abby Youngblood. I'm the Executive
15 Director at the National Organic Coalition, and I want to start
16 by welcoming the new NOSB members and thanking all of the NOSB
17 members for the hard work that you're doing right now to review
18 public comments with a truncated timeline.

19 The National Organic Coalition is a cross-sector
20 alliance of organizations and companies from across the U.S.
21 working together using a consensus process to advance organic
22 agriculture and protect organic integrity. And since we were
23 founded in 2002, we've worked very closely with the NOSB
24 because of the central role that you play in keeping the
25 organic standards strong through this public and transparent

1 process that we're all engaged in right now.

2 We hope that NOSB members will join the National
3 Organic Coalition in elevating three top priorities as we
4 communicate with USDA leaders and the new administration about
5 organic agriculture. First, it's essential that we keep the
6 National Organic Program strong, and we know that the NOP
7 performs indispensable functions to protect the investments of
8 organic farms and businesses, including investigating fraud in
9 organic supply chains. Preventing NOP staff reductions is a
10 core concern right now.

11 Second, we are still waiting to hear the fate of the
12 transition to Organic Partnership Program and the Organic
13 Market Development Program, and these programs are really
14 critical to scaling domestic organic production, building
15 supply chains, and keeping U.S. producers competitive.

16 Finally, the USDA's flagship organic research
17 program, the OREI program, is frozen, and it's vital that that
18 \$50 million in mandatory funding authorized through the Farm
19 Bill goes out in 2025.

20 Regarding the NOSB's internal process, there are a
21 few big-picture issues that I want to elevate. We ask that you
22 please rely on the established and efficient sunset review
23 process to delist synthetic materials when warranted, and we
24 urge that you please do not require a separate petition to
25 delist the material. This undermines the integrity and the

1 efficiency of the sunset process.

2 Regarding technical reviews, we ask that you follow
3 the practice of requesting a technical review for every new
4 petition. This ensures an independent, accessible, and
5 consistent evaluation. It supports transparent decision-
6 making, and it ensures that that decision-making is aligned
7 with the Organic Foods Production Act criteria.

8 And finally, I want to urge you to hold the NOSB
9 meeting this fall in person in Omaha. In-person NOSB meetings
10 foster deeper engagement, relationship building, and productive
11 deliberation among Board members and the organic community.
12 These connections are difficult to achieve in a virtual
13 setting, and they're really important right now, especially
14 with five new Board members.

15 Thank you so much for considering our comments.

16 CHAIR BRUCH: Abby, thank you. Really appreciate you
17 lending your voice to the process today.

18 Any questions for Abby?

19 (No response.)

20 CHAIR BRUCH: Abby, I want to ask you just briefly,
21 how do we grow our fantastic organic program? There's a lot of
22 farmers that have engaged in this process and are really
23 wanting to, you know, ensure the future of organics. What are
24 some steps you can think of to, you know, kind of be a catalyst
25 here?

1 MS. YOUNGBLOOD: Thank you so much for that question.
2 I know one of the things that we've been focused on is the
3 impact that the Transition to Organic Partnership Program has
4 had in a really short amount of time, and it's been able to
5 fill some really key gaps. So there are a lot of operations
6 that could transition to organic and where there's a market,
7 but sometimes they just need that human connection of somebody
8 helping step through how to craft an organic systems plan.
9 That peer-to-peer mentorship is really important, and I would
10 encourage Board members to take a look at the impact report
11 showing in just two short years what the Transition to Organic
12 Partnership Program has achieved in filling that gap.

13 I know for the National Organic Coalition, we really
14 are concerned about the loss of acreage here in the U.S. and
15 the loss of organic producers and that trend line of the demand
16 for organic growing. It is growing, but the number of organic
17 producers and acreage is not, so I think that warrants our
18 attention.

19 CHAIR BRUCH: Thanks, Abby.

20 Any other questions for Abby?

21 (No response.)

22 CHAIR BRUCH: Okay. Really appreciate your
23 leadership.

24 All right. Alan Lewis, I believe we got a message
25 that he is not able to join.

1 Is that correct, Michelle?

2 MS. ARSENAULT: That's correct, Amy. He's in a
3 location with no Internet connection now.

4 CHAIR BRUCH: Okay. We will go down to Mike
5 Schulist. Are you available?

6 And then we will go try to catch up some folks from
7 earlier in the day.

8 Mike Schulist?

9 MR. SCHULIST: Yep.

10 CHAIR BRUCH: Please state your name and affiliation.
11 Thanks for joining us.

12 MR. SCHULIST: All right. Mike Schulist, National
13 Farmers Organization, Ames, Iowa. Certified organic as a
14 handler, as NFO Members Grain, Inc. National Farmers is a
15 501(c) organization, and operates under Capper-Volstead
16 cooperative rules. I represent our NFO member producers
17 located in the states of Montana, North and South Dakota,
18 Minnesota, Iowa, Wisconsin, and Illinois. I have 18 years of
19 experience marketing organic grains, the past seven years
20 representing National Farmers NFOrganics.

21 The organic grain market has experienced a lot of
22 downward price pressure over the last few years. Many long-
23 time organic grain producers are disappointed with the current
24 organic grain prices. Producing more bushels for less money is
25 not a system that is working for today's organic farmer.

1 Though the organic industry is telling us we need
2 more organic farmers, more organic corn, soybeans, wheat, and
3 other small grains, if we increase our domestic acres of
4 organic crops, we may not need to source any imported organic
5 feed products. Because of disappointingly low prices, some
6 organic farmers have returned to conventional farming, victims
7 of the market. I believe that organic grains will return to
8 sustainable prices. The question is when. How much longer can
9 the organic grain producers hang on with these low grain
10 prices?

11 The consumer wants locally sourced organic food, a
12 country of origin label, traceability, and transparency.
13 Knowing your farmer, knowing where your food comes from, is of
14 great importance to today's consumer. Does the organic
15 consumer know that imported grains are coming into this country
16 without any residue testing? I would say that the average
17 organic consumer does not know that residue testing is not
18 being done on imported grain. Organic consumers expect organic
19 products to be free of any contamination with prohibited
20 substances, period.

21 The organic industry is always changing.
22 Keep it going in the right direction. With transparency,
23 traceability, and residue testing for imports, a country of
24 origin label for organics.

25 Thank you, NOSB, for drafting a good document, and

1 please implement in a quickly manner.

2 Thank you.

3 CHAIR BRUCH: Mike, thank you for participating in
4 our process, and your work with organic producers, finding
5 markets.

6 Any questions for Mike here?

7 (No response.)

8 CHAIR BRUCH: Just a quick question, Mike. You
9 mentioned prices. Where are we at from your perspective with
10 organic prices of the commodities you work with versus
11 conventional?

12 MR. SCHULIST: Well, the corn price still continues
13 to struggle. That's probably one of the sore spots, and the
14 organic wheat price, whether it be winter wheat or spring
15 wheat, hard red spring or hard red winter. Those prices are
16 really struggling.

17 Despite last year's conditions, last year's harvest
18 conditions in August, September were really poor for the wheat
19 growers. A lot of vomitoxin in the upper Midwest, so that's
20 really a challenge. But the wheat price, it definitely needs
21 -- there has to be room for improvement. There's many farmers
22 in the upper Midwest that are going to tear up their winter
23 wheat and go another direction.

24 Of course, logistics are everything. If you do have
25 -- I've had some organic producers that have to take their corn

1 100 miles. If they're delivering 100 miles to an organic
2 market, their premium is lost at, you know, between \$6 and \$7,
3 corn just doesn't cut it for those producers, and those are the
4 ones that are on the fence for going back to conventional
5 practices.

6 CHAIR BRUCH: Mike, thank you for relaying that extra
7 information. I don't see any other questions. Good luck this
8 season.

9 MR. SCHULIST: Thank you.

10 CHAIR BRUCH: Yes, thanks for your time again.

11 All right. Folks, that's the first pass. We have a
12 few to catch up in our comment sweep. I'm just going to call
13 up the names in order in which we initially skipped them.

14 Is Tim Harder available? Tim Harder?

15 MS. ARSENAULT: Tim was not able to come back at the
16 end of the day today, Amy.

17 CHAIR BRUCH: Okay. Thank you, Michelle. Appreciate
18 your coordination there.

19 Ryan Klassen. Do we have Ryan?

20 MS. ARSENAULT: Ryan is on the line with us. There
21 we go. Give it a second, and he'll appear.

22 CHAIR BRUCH: Excellent. And then on deck, if we
23 have them, Byron Goolsby and Jerod Reuter.

24 So, Ryan, please go ahead, state your name and
25 affiliation. Thanks for joining us.

1 MR. KLASSEN: Good afternoon, NOSB members. I didn't
2 know a single thing about the NOSB as of two years ago, but
3 I've now attended for the first time in Milwaukee last year,
4 then flew to Portland. A couple takeaways.

5 In Milwaukee, plenty of grain farmers in attendance.
6 In Portland, Oregon, only one, myself. For some reason,
7 organic grain farmers get left out of the loop any time this
8 meeting happens on the coast. Logistics play a part in that.
9 At the same time, if there's no voices in the room, that will
10 continue to be a problem.

11 Some of you might be aware of a Facebook group, of
12 all things, Modern Organic Row Crop Producers. A person
13 earlier today spoke about policies that have recently been
14 unveiled and/or the staffing cuts to the NOP, in which I think
15 every Board member should know that when that post was made,
16 the organic grain farmers cheered that the NOP got their
17 staffing cut to the tune of, good, they weren't doing anything
18 anyway, meaning the optics on this is SOE was supposed to solve
19 all these low prices two years ago -- wait till SOE comes out,
20 wait till SOE comes out.

21 SOE comes out and we have to extrapolate all the bars
22 and charts and graphs to put in lower numerical values the
23 prices are so low. A lot of times I've found management
24 doesn't know about the problem, it's hard to get fixed. So I'm
25 trying to educate you now.

1 Another thing would be really nice is if there was a
2 universal OSP amongst all the certifiers. Seems pretty simple.
3 Pick one via democracy of votes, and be done with it. It would
4 streamline a lot of certification issues.

5 Last thing, having personally spoke with the
6 Compliance and Enforcement Division within the NOP, it's
7 ridiculous that I was told that in the Compliance and
8 Enforcement Division they are not allowed to use the AMS --
9 Agricultural Marketing Statistics -- Ultimate Feedstuffs
10 Report. So how can you fight fraud if you're only tracking the
11 volume of it and not the price of it? If you could make a
12 recommendation as a Board to the NOP to track both the price,
13 not just the volume of the stuff that's coming in.

14 That is all.

15 CHAIR BRUCH: Ryan, thank you for lending your voice
16 to the process today.

17 I want to open up to Board members for any questions
18 for Ryan. We have one from Kathryn.

19 Go ahead, Kathryn.

20 BOARD MEMBER DESCHENES: I just think I missed where
21 you farm.

22 MR. KLASSEN: Central Minnesota, Stearns County.

23 BOARD MEMBER DESCHENES: Very good.

24 CHAIR BRUCH: Thank you. Any other questions from
25 the Board?

1 (No response.)

2 CHAIR BRUCH: Ryan, I have a question real quick.
3 Any direct ways we should look for continuous improvement? I
4 know I believe in a previous public comment session you were
5 talking about continuous improvement and what can we do, how
6 can we rally around some of these challenges. What are some of
7 your thoughts?

8 MR. KLASSEN: I don't think we have enough time for
9 that today, but --

10 CHAIR BRUCH: Anything brief you can exchange.

11 MR. KLASSEN: Make sure that when this Organic
12 Imports Verification Act becomes real, that there is a
13 substantial fine assessed with the law so that there is a
14 deterrent for the people that want to break it. They're like,
15 hmm, maybe I actually can't afford to break that rule -- so
16 that it actually has some, you know, there's actually meat and
17 potatoes in it, not just here's a rule, but actually the fine
18 is \$500, and, well, anybody can afford that, so big deal.

19 CHAIR BRUCH: Thank you for your comments today.
20 Thanks for your participation, and good luck this season.

21 MR. KLASSEN: Thank you.

22 CHAIR BRUCH: We will continue on. We have a couple
23 other members. Michelle, let me know if you've heard from
24 them. We have Byron Goolsby. Is Brian on the phone? Sorry,
25 Byron Goolsby, I apologize.

1 MS. ARSENAULT: It doesn't look like Byron is with
2 us.

3 CHAIR BRUCH: Okay. Do we have Jerod Reuter, by any
4 chance?

5 MS. ARSENAULT: Jerod is on the webinar with us.

6 CHAIR BRUCH: Excellent. Jerod, you are our last
7 speaker today. When you jump on, please state your name and
8 affiliation.

9 MS. ARSENAULT: Andrea will get him unmuted and his
10 camera live -- or not. Optional.

11 (Pause.)

12 MS. ARSENAULT: Just one second. I see him on the
13 line, but not sure if we're having trouble getting his mic
14 unmuted. He doesn't appear to be responding to the unmute
15 button.

16 CHAIR BRUCH: Ah, okay. Is it star six, Michelle?
17 Is that what would --

18 MS. ARSENAULT: He's in the webinar.

19 CHAIR BRUCH: Oh, he's in the webinar. Okay.

20 MS. ARSENAULT: Maybe he stepped away.

21 CHAIR BRUCH: Okay, one last call for Jerod Reuter.
22 Okay. Well, I apologize, Jerod.

23 We are going to keep going here. With that, we have
24 concluded today, the first day in our public comment webinar.
25 I really do appreciate everyone who provided comments to the

1 Board. Exceptional exchange, and we were able to maintain the
2 objective of ending on time. I want to definitely give back
3 this time to the Board as we purposely prepare for our upcoming
4 meeting and process what we heard today and also stay close to
5 the written comment submission.

6 Again, I want to highlight written comment docket is
7 still open, so please work on follow-ups from either this
8 meeting or additional thoughts you want to exchange with the
9 Board as we look next week to deliberate on several matters.

10 Again, we will reconvene on Thursday, April 24th, at
11 noon Eastern. And that's all I have today. Thank you so, so
12 much. And nice job, new Board members, and nice job, senior
13 Board members. Really appreciate it. Take care.

14 MS. ARSENAULT: Thanks, everybody. Thanks, Amy.
15 I'll hang out for a little bit until folks start to drop off.
16 There we go.

17 COURT REPORTER: Michelle -- Jerod.

18 MS. ARSENAULT: I see Jerod's camera on now.

19 COURT REPORTER: Yeah, he's like throwing his hands
20 up like --

21 MS. ARSENAULT: Amy?

22 CHAIR BRUCH: Well, this will be on the transcript,
23 correct, Michelle?

24 MS. ARSENAULT: Correct. Yeah.

25 CHAIR BRUCH: Actually, well --

1 COURT REPORTER: Still recording, Michelle.

2 MS. ARSENAULT: Yeah, she's still recording.

3 CHAIR BRUCH: Okay. Jerod, I think actually we're
4 going to have to go to our first suggestion. We're going to
5 end the meeting, but what I would like and strongly encourage
6 you to do, if you have your comments that you were going to
7 deliver orally, could you just submit those to the written
8 docket? I see we're losing quite a few participants here and
9 maybe have lost some Board members. Is that a possibility for
10 you to just submit what you were going to say here today to the
11 written comment docket? Okay. I think I--

12 MR. REUTER: Yeah, it's not super long. Again, we're
13 just a composter, so it was more wanting to talk about
14 compostables, which I heard up. I made a mistake, so that's on
15 me. I then walked away from my computer, and it looks like you
16 guys were maybe trying to get ahold of me, because I had
17 something else come up.

18 But, yeah, basically it's agreeing with the
19 contamination on compostables, but if we can prove they're
20 plant-based, doing food liners, because as more municipalities
21 eventually ban food, like there needs to be a home for it, and
22 if there's not, eventually organic farmers won't have compost
23 choices, period because --

24 So, but I can write it, and, again, I 100 percent
25 agree. We currently don't take any compostables at all. We

1 started doing food, but we don't take any compostables. The
2 one that's coming up though, working with our partners, again,
3 is just the compostable liners for back-end large food
4 processors and stuff like that, because how do you get the
5 stuff out to the trash can?

6 CHAIR BRUCH: Sure. Excellent. Well, I apologize
7 for the Murphy's Law. It just usually follows me wherever I
8 go, but I do want to encourage you to please, please, please
9 participate in this written comment process. We want to hear
10 your voice, and that will be the best way.

11 MR. REUTER: Sure, and where is that?

12 CHAIR BRUCH: Actually, how about maybe Michelle can
13 send you an email how to access that, if that's okay.

14 MR. REUTER: Okay. We can do that, then.

15 CHAIR BRUCH: I appreciate the first-time
16 participation.

17 MR. REUTER: Yeah, no, it was nothing urgent, like I
18 said, and I'll just give my comments again. I'm not a huge fan
19 of compostables, but if it's limited to kind of one and they
20 have to go through an approval process, you know, does it help
21 the environment and meet all the needs as organic, you know.

22 CHAIR BRUCH: Okay. Excellent. We'll follow up with
23 a written comment link. Michelle will do that, and we will
24 look forward to seeing what you were going to say. All right.

25 MR. REUTER: That sounds good. Thank you, Amy.

1 Appreciate it.

2 CHAIR BRUCH: Appreciate it, everybody.

3 MR. REUTER: No problem.

4 CHAIR BRUCH: Michelle?

5 MS. ARSENAULT: Yes, I couldn't get unmuted.

6 CHAIR BRUCH: Hi. Okay. Are we off the record now?

7 MS. ARSENAULT: Yep, I'm going to stop the recording.

8 ELECTRONIC VOICE: Recording stopped.

9 (Whereupon, at 4:52 p.m., the virtual hearing in the above-
10 entitled matter was adjourned until Thursday, April 24, 2025,
11 at 12:00 p.m., Eastern Standard Time.)
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CERTIFICATION

This is to certify that the attached proceeding before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: SPRING 2025 NOSB COMMENT WEBINAR

PLACE: Zoom for Government

DATE: April 22, 2025

was held according to the record, and that this is the
original, complete, true and accurate transcript which has been
compared to the record at the hearing.



Elaine M. LaRosee, CDLR

Official Reporter

	ACA's (1) 75:7	9	addition (5) 71:7;74:5;78:19; 115:19;142:18	advice (1) 159:21
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In The Matter Of:
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
COMMENT WEBINAR DAY 2

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April 24, 2025



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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC STANDARDS PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB) COMMENT WEBINAR

Thursday,

April 24, 2025

Held via Zoom for Government

National Organic Standards Board (NOSB) Members

Amy Bruch, NOSB Chair

Allison Johnson, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Kathryn Deschenes

Carolyn Dimitri

Amanda Felder

Andrea Hatziyannis

Cat McCluskey

Dilip Nandwani

Logan Petrey

Corie Pierce

Franklin Quarcoo

Kyla Smith

Javier Zamora (absent)

National Organic Program Staff, Standards Division

Erin Healy, Division Director

Jared Clark, Assistant Division Director

Andrea Holm, Agricultural Marketing Specialist

Heather Kumar, NOSB Food Technologist

Michelle Arsenault, NOSB Advisory Committee Specialist

Johanna Mirenda, Agricultural Marketing Specialist

P R O C E E D I N G S

(Time: 12:00 p.m.)

MS. ARSENAULT: Well, welcome, everybody. We are reconvening our meeting from being in recess since Tuesday afternoon. Welcome back, if you were here with us on Tuesday, and for those of you who weren't, welcome to the second day of the National Organic Standards Board public comment webinar.

I'm going to go through a little bit of housekeeping, some administrative stuff before we get started. And there's a slide on the screen in case you are not with us in the Zoom meeting and you're just on the phone.

So attendees in the meeting are on mute, and you'll be unable to unmute yourself and turn your camera on and off. The chat feature is enabled in Zoom. It's usually in the center of your Zoom taskbar. So you can chat with each other, say hello, relay technical difficulties if you're having trouble hearing or whatnot. But chats are not part of the public record and are not a public comment. And the NOSB won't be answering questions in the chat. So just so you know that. You won't be getting answers to questions.

Closed captioning is available in Zoom. If you click the "More" button, the three dots, the ellipsis, in your Zoom menu, you should see a live transcript button. And you can turn captions on or off. You can change the font size if you need to do that under that widget. Please do not use the

1 "Raise Hand" button, which will be available to
2 you. Commenters had to the register in advance in order to
3 speak, and those are the people that will be called on by the
4 board chair.

5 You can customize your own view in Zoom. If you go
6 to the upper right corner, you'll see the "View" button. And
7 you can see gallery view. You can do a speaker view. We're
8 going to pin and highlight a couple of Zoom tiles on the screen
9 that will appear no matter what view you're using. But you can
10 rearrange and customize what you want to see.

11 You can also use the "View" button to exit full
12 screen. When we share a Zoom slide deck, it'll take over your
13 whole screen. So if you hit "Exit Full Screen," it'll minimize
14 the Zoom window and won't take over. And don't worry, all of
15 those changes that you make on your personal computer will not
16 affect anybody else's view.

17 If you're having technical problems in Zoom, you can
18 contact the support line for Zoom, support.zoom.us, or as a
19 tried and true method, log out and log back in and that usually
20 solves most of the problems.

21 So the webinar is being recorded. And we will have a
22 transcript of the entire meeting, the two webinars this week
23 and the full meeting next week. We'll have those available and
24 hopefully posted to the website a couple of weeks after the
25 meeting concludes.

1 Next slide, please, thank you. So speakers, we want
2 to make sure that we can locate you in the Zoom meeting when it
3 comes time for us to call on you. So just make sure your name
4 is correct in your tile. And your mic and your camera are
5 muted and off. And when it comes time for you to speak, you
6 might see a pop-up message on the screen saying the host has
7 asked you to unmute yourself, and then you'll be able to unmute
8 at that time. So when you're called on, you can then unmute
9 yourself. Turn your camera on if you want. It's optional, you
10 don't have to be on camera.

11 If you're on the phone only and you don't happen to
12 have a mute button, you can hit star six to mute and unmute the
13 toggles. Also make sure if you're dialing in on the phone and
14 you were signed up to comment that I have the phone number that
15 you're dialing in from so we can find you in the participant
16 panel.

17 When you come to the mic, you're going to state your
18 name and affiliation for the record at the start of the
19 comment, and then I'm going to start the timer. Each commenter
20 has three minutes to speak and then the timer will buzz when
21 you're done. We ask that when you hear the beep and finish
22 your sentence. And I'm going to test the timer here just to
23 make sure everyone can hear it okay. If I could get some
24 thumbs up or waves. Okay, it looks like folks could hear it,
25 great.

1 We're going to pin the timer on the screen in my
2 video title so it will be visible throughout the whole
3 meeting. And at the end of your comment, don't mute yourself
4 and go away because the Board Chair, Amy Brooke, is going to
5 ask the other Board members if there are any questions. So if
6 there are any questions, you want to just stay on the line with
7 us.

8 All right, now I'm going to hand the mic over to Erin
9 Healy, who is the Director of the Standards Division for some
10 welcoming remarks. Erin.

11 MS. HEALY: Thank you. Hello, everybody. Welcome
12 back to Day 2. Today's webinar -- after today's webinar, we
13 will actually have the meeting next week, starting
14 Tuesday. And at that meeting, our Deputy Administrator, Chris
15 Purdy and the top speakers from the Southwest region, as well
16 as the NOP Directors, will be providing an update on the
17 program and on TOPP program and their participants. So join us
18 next week.

19 All that information, the details in the meeting,
20 access information is on our NOSB meeting page if you need
21 those details.

22 This meeting, like all other meetings of the National
23 Organic Standards Board, will be run based on the Federal
24 Advisory Committee Act and the Board's policies and procedure
25 manual. And Amy Brooke, our Board Chair, will facilitate the

1 session. And again, we just remind everyone this is an open
2 and transparent process. We're very grateful to have these
3 virtual meetings to shape policy and hear from folks wherever
4 they are, including an attractor on the field. But please do
5 be respectful of each other, and that includes the chat
6 messages as well. So please be graceful, even if we may
7 disagree. So thank you, everyone.

8 And I'm going to hand the mic back to Michelle.

9 MS. ARSENAULT: Thanks, Erin.

10 Okay, I'm going to do a roll call of the Board
11 members as a way to test our mics, test our cameras, and then
12 we'll get started. Amy Bruch.

13 CHAIR BRUCH: Here from the Heartland, thank you.

14 MS. ARSENAULT: Hello, Amy. Brian Caldwell.

15 BD. MEM. CALDWELL: Here, hello, everyone.

16 MS. ARSENAULT: Hi Brian. Kathryn Deschenes.

17 BD. MEM. DESCHENES: Hi, hi, hi from Colorado.

18 MS. ARSENAULT: Hi, Kathryn. Carolyn Dimitri.

19 BD. MEM. DIMITRI: Good afternoon, everyone.

20 MS. ARSENAULT: Hi, Carolyn. Amanda Felder.

21 BD. MEM. FELDER: Good morning.

22 MS. ARSENAULT: Good morning on the West Coast
23 there. Andrea Hatziyannis.

24 BD. MEM. HATZIYANNIS: Good morning from Arizona.

25 MS. ARSENAULT: Hi, Andrea. Allison Johnson.

1 VICE CHAIR JOHNSON: Good morning.

2 MS. ARSENAULT: Morning, Allison, sounds good. Nate
3 Lewis.

4 SECRETARY LEWIS: Present.

5 MS. ARSENAULT: Thanks, Nate. Cat McCluskey.

6 BD. MEM. MCCLUSKEY: Hey, good morning, Elle.

7 MS. ARSENAULT: Good morning, Cat. Dilip Nandwani.

8 BD. MEM. NANDWANI: Good morning from Tennessee.

9 MS. ARSENAULT: Hello, Dilip. Logan Petrey.

10 BD. MEM. PETREY: Hi, good afternoon.

11 MS. ARSENAULT: Hi, Logan. Corie Pierce.

12 BD. MEM. PIERCE: Good morning.

13 MS. ARSENAULT: Hi, Corie. Franklin Quarcoo.

14 BD. MEM. QUARCOO: Good morning.

15 MS. ARSENAULT: Good morning, Franklin. Kyla Smith.

16 BD. MEM. SMITH: Hi, Elle.

17 MS. ARSENAULT: Hey, Kyla. And for the record,
18 Javier Zamora is absent.

19 All right, Amy. But, you know, I did forget to
20 mention one thing at the opening. The written public comment
21 session is still open through midnight on Monday, April 28th,
22 and that's midnight Eastern time. And heads up,
23 regulations.gov, where you submit your written comments, is
24 going to be under maintenance starting Friday night, tomorrow
25 night, 5:00 p.m. Eastern through Monday morning at 8:00 a.m.

1 Eastern.

2 So if your comments are written and you were going to
3 submit them, either submit them before Friday afternoon Eastern
4 time, or you're going to have to wait until Monday to submit
5 them. So just that note. Okay, Amy, all yours.

6 CHAIR BRUCH: All right, thank you, Michelle. I'm
7 Amy Bruch, a farmer based in East Central Nebraska, and your
8 facilitator today. So happy to see everybody. Thanks for the
9 participation and Day 2. Thanks also to NOSB, the NOP, organic
10 stakeholders, and all others. I sincerely appreciate
11 everyone's time and participation, both on Tuesday and in
12 advance of today's session.

13 Note, today is special because it's our second day of
14 public comments. And also want to say thank you, because in
15 the Midwest, we're experiencing some rain. So I'm thankful and
16 appreciative for our farmer commenters that maybe less
17 multitasking will happen, and they can have a little bit easier
18 time to participate due to the rain.

19 I want to extend a warm welcome to all Board members,
20 and thank you all for doing the best you can in preparation of
21 our meeting. I know it's more of a unique scenario, and I just
22 appreciate all the extra efforts everybody's doing in the
23 background. We have five new members who are just starting
24 this year and are already making strides. I'm confident they
25 will quickly adapt to this process. So welcome to our new

1 members.

2 Also, big welcome to our new deputy director,
3 Christopher Purdy. We really look forward to your
4 leadership. A special thanks to the NOP team for all the
5 efforts in managing the logistics and keeping everything
6 running smoothly in the background. There is a tremendous
7 amount of behind-the-scenes work that goes into these virtual
8 comment webinars and virtual meetings, so thank you again.

9 I have a few quick special reminders, just as I did
10 on Tuesday, and then we'll get into those standard
11 reminders. We will be managing the schedule as closely as
12 possible throughout the day, and that's because we've been
13 tasked to end the webinar at the scheduled time. I'll be
14 providing reminders throughout the day on that, but if I do
15 miss you, or if the speakers are missing their scheduled times,
16 I'm going to do a sweep at the very end of the day if time
17 permits for those commenters that missed their original
18 scheduled speaking spots.

19 We want to definitely have a robust question and
20 answer exchange, but please be pithy on both sides of the
21 equation so we can fit as many questions as possible in the
22 time allotted. And don't worry, as I mentioned already, and I
23 will throughout the day again, I will be providing those
24 reminders to speakers and Board members. And big apologies in
25 advance for any interruption I might have to do. Again, that's

1 for the schedule management attention this public comment
2 session.

3 So one silver lining, Michelle already mentioned
4 this, we do have the written comment process doc open still,
5 and that's concurrent with this public comment webinar. That's
6 a unique situation, so please take advantage of that. If you
7 have additional comments you want to make sure to relay onto
8 the Board. I want to alert the community that there was an
9 update to the docket as well. We talked about this on Tuesday,
10 the wrong sodium bicarbonate sunset was submitted in handling,
11 and it is now included in the updates that are available on the
12 website. So please read through that.

13 If you need to get us additional comments on that
14 substance, sodium bicarbonate in handling, please submit that
15 via the written doc for us, and we apologize for this
16 error. And now I'm going to touch on the standard reminders --
17 standard operating procedures here. Thanks for putting up that
18 slide.

19 The NOSB has a policy and procedures manual, and it
20 is available to the public. All speakers who will be
21 recognized signed up in advance during the registration period.

22 Persons must give their names and affiliation for the record
23 at the beginning of their public comment, and I'll make sure to
24 put out reminders for our speakers on that. Proxy speakers are
25 not permitted. Individuals providing public comment shall

1 refrain from making any personal attacks or remarks that might
2 malign the character of any individual or organization.

3 We'd highly value your comments, but please don't
4 bring up anything personal, any names, any personal names, or
5 cause anybody to feel uncomfortable. Let's keep things
6 professional, respectful, and classy.

7 Members of the public are asked to define clearly and
8 succinctly the issues they wish to present before the Board.
9 This will give the NOSB members a comprehensible understanding
10 of the speaker's concerns. I will call on the speakers in the
11 order of the schedule and will announce the next person or two
12 so they can prepare. Please correct me if I mispronounce your
13 name, and also, again, a reminder, please remember to state
14 your name and affiliation, and then Michelle will graciously
15 start that timer.

16 Board members will indicate to me if they have
17 questions, and I will call on them generally in the order in
18 which their hands are raised. If we have a lot of questions
19 for a particular speaker, I will do my best to call on some new
20 voices that maybe haven't had their hands up in the past.

21 Board members, please get my attention. If I don't
22 see your hand, only NOSB members are allowed to ask questions,
23 so we're not going to be taking questions from the community,
24 only NOSB members. And a reminder to the Board members,
25 definitely don't convey your opinions or comments during this

1 webinar session. We will be making sure to capture all of that
2 during our deliberation sessions in our meeting next week.

3 Lastly, I look forward to another great meeting
4 today. I'm excited to hear the exchange from our community,
5 and again, see our new members dive in. And without further
6 ado, we'll get the process started today. Thank you.

7 We have speaker one for the day is Harriet Behar,
8 followed by Kristopher Klockenga, and then David Bishop. So,
9 Harriet, please start us off, and state your name and
10 affiliation, please. Do we have Harriet?

11 MS. BEHAR: Okay, thank you. I was waiting for
12 Michelle to unmute me.

13 CHAIR BRUCH: No problem.

14 MS. BEHAR: I'm Harriet Behar with the Organic
15 Farmers Association, a former NOSB chair, and an organic farmer
16 from Southwest Wisconsin. Thank you to all of the NOSB members
17 for your service to the organic community. It is greatly
18 appreciated.

19 Please refer to the Organic Farmers Association's
20 written comments, including adding to your work agenda, organic
21 swine production, technical reports on newly petitioned items,
22 and that they be done by a competent neutral third party,
23 adding an improved annotation to oxytocin and other
24 items. Here, I will address the consent agenda, paper, and
25 compost feedstocks.

1 OFA does not agree with the consent agenda discussion
2 document. Why was the sunset rule written into the Organic
3 Food Production Act? This was to allow for robust review every
4 five years of the materials allowed or not in organic
5 production, including any new information or concerns by the
6 public and the Board stakeholders, such as the consumer or the
7 scientist, unless they then were only part of the subcommittee.

8 Future NOSB members refer to these earlier sunset
9 reviews by the full Board, which in the future would contain
10 little to no information since discussion would only be in the
11 subcommittee without public transparency. Paper is a good
12 example. This could be on the consent agenda since it has been
13 on the national list for decades as an allowed compost
14 feedstock and mulch.

15 However, paper has changed to where over 40 percent
16 of it now is from recycled materials, which most likely contain
17 the colored inks and glossy papers, and we can no longer track
18 these. We have learned that polymers are now present where
19 paper used to be composed mostly of cellulose. We cannot risk
20 the damage to thousands of acres of organic land when covered
21 by compost that has been contaminated by unwanted synthetics.

22 Paper in production aids, due to their need for
23 specific requirements, at this time tend to be from virgin
24 feedstocks with few to none of the additives currently found in
25 newsprint and recycled papers. These production aids are

1 limited to a small area compared to the tons of potentially
2 contaminated compost applied per acre. Sunset reviews provides
3 for tracking these changes to materials. The requirement that
4 every material have a robust review by the full Board every
5 five years is essential to organic integrity. To date, the
6 NOSB has been able to do this type of robust review within the
7 allowed timeframe.

8 And again, I want to say welcome to the new members.
9 And I'm done.

10 CHAIR BRUCH: Thank you, Harriet, for kicking us
11 off. I am going to open it to the Board for questions. I see
12 a couple here. Nate, please, go ahead.

13 SECRETARY LEWIS: Yeah, thanks, Harriet. Appreciate
14 your wisdom and guidance on these issues.

15 I'm curious, again, around paper and compost. We
16 hear from composters that paper is necessary, particularly for
17 leaf collection bags in the Midwest and Northeast. You know,
18 we can debate about whether that is a necessary, you know,
19 whether there is necessity there, but I'm curious if OFA or you
20 have -- would have support for paper as a compost feedstock if
21 there were some appropriate restrictions played into it or some
22 more modernized annotation language related to that particular
23 substance.

24 MS. BEHAR: Well, as a farmer, I'm very concerned
25 about what might be put on my land. And I have watched closely

1 where, and just so grateful that we don't allow sewage sludge,
2 because back when we originally banned it, we didn't even know
3 that there were PFAS. And here we've had organic farmers
4 suffer because previous landowners had put sewage sludge on, to
5 no fault of their own, and, you know, 12, 15 years later, they
6 are still suffering from those synthetic ingredients. A lot of
7 these chemicals do not go away. And I just so much want to
8 steward my soil.

9 So I think being precautionary in whatever we allow
10 is essential because we have learned that we just don't know
11 how long these materials will persist in the environment. And
12 of course, we have also now learned just recently about
13 microplastics in our brains. And I mean, coming up in through
14 the food, we have so much to learn. So I think being
15 precautionary as much as possible.

16 We have to empty the bags. We have to empty the
17 bags. If we can make the bags without polymers, without the
18 inks that we don't want, the carbon black. I mean, all of
19 these things are problematic. And I think when we talk about
20 the soil, it is our place to steward as organic farmers and as
21 the organic community and just be very careful about what we
22 add.

23 CHAIR BRUCH: Thank you, Harriet. Thanks for the
24 question, Nate. Carolyn, go ahead.

25 BD. MEM. DIMITRI: Harriet, I always appreciate your

1 insights. They're very thoughtful. I wanted to ask you about
2 the consent agenda. In your view, do you think having a robust
3 discussion in the spring meeting and then voting on a consent
4 agenda in the fall meeting is sufficient to allow for that
5 engagement that you were just mentioning?

6 MS. BEHAR: Well, I have been to many NOSB
7 meetings. Maybe I wish I didn't count them all, but probably
8 over 50. And I have seen that between the spring and fall
9 meeting, new information does come forward. I don't see,
10 unless you want to cut back by a full day, your meetings, that
11 the robust discussions are really taking up that much
12 time. It's pretty obvious when there isn't a lot of new
13 information or a concern that the vote moves through, but at
14 least the full Board has a chance to talk to their stakeholder
15 communities and bring that information forward.

16 So I think we don't want to stifle discussion even at
17 the fall meeting, because something new could have come up in
18 between those six months between the two.

19 BD. MEM. DIMITRI: Thank you.

20 CHAIR BRUCH: Carolyn, for that question. Harriet,
21 thanks for your time today and all your contributions to our
22 community. Appreciate it.

23 All right. We have Kristopher Klockenga, followed by
24 Dave Bishop, then Seth Kroeck. Go ahead, Kristopher, please
25 state your name and affiliation.

1 MR. KLOKKENGA: Hi, my name's Kris Klockkenga. I'm a
2 farmer located in central Illinois. I've been farming organic
3 since about -- transitioning since 2015, and now have almost 90
4 percent of my farm in organic production.

5 I just want to say thank you to the Board for your
6 time and for your service to hear what we have to say. It
7 means a lot from a farmer that I have a platform here to convey
8 my thoughts and ideas. I wanted to speak with you today about
9 fraud and testing.

10 My background is I worked in West Africa and Ghana
11 for eight years, and six of those years, I worked for a
12 multinational doing agricultural processing for two years, and
13 for the other six, I started a farm in West Africa on the
14 shores of Lake Volta. So I do have some experience on -- we
15 grew eight crops, eight crops and four seed -- sorry, in four
16 years, we grew eight crops, two crops a year. A lot of the
17 fraud that we're seeing is coming out of West Africa, and I
18 just wanted to let you know that I am concerned about that,
19 fraud in general, but also when it comes from there, there's a
20 lot of small farmers.

21 It's hard for me to see how this works for them to
22 make that happen. We farm -- at that time, I did not farm
23 organically in West Africa. And so I just want to encourage
24 you to continue to practice means of checking and that we find
25 ways to combat fraud coming into the United States for soybeans

1 and corn, specifically that enter through exports or imports on
2 our side.

3 I wanted to also just mention that I would like to
4 see tools for certifiers to use that would be handy for them to
5 be able to find out easy ways to check loads and to be able to
6 move forward with finding just solutions that we can empower
7 them to quickly figure out how to make things work and make
8 sure that what is being said is being imported in the United
9 States actually is.

10 So I just experienced a lot of challenges when I was
11 there with just general utilities like electricity, roads,
12 power, and trying to get all that stuff done and be
13 organic. I'm sure people are doing it, but I have my doubts
14 and would just like to voice that to the Board that you are
15 able to look into that further and help just ensure that if
16 organic products are coming into the United States, they are
17 actually produced in an organic manner. Thank you.

18 CHAIR BRUCH: Kris, thank you. I appreciate your
19 comments. Is there any questions from the Board? I see one
20 from Franklin. Go ahead, Franklin.

21 MR. QUARCOO: All right. So, Kristopher, do you have
22 any additional, given your experience in the West African
23 region, do you have some information on how it is getting
24 in? Where are the lapses? Do you have any idea about how it
25 happens? Anything, having done business there?

1 MR. KLOKKENGA: Yes. I mean -- what I would suspect
2 is this. I would suspect that people are willing to try to
3 take the chance on the importation of a container of soybean
4 meal or a container of soybeans into the United States. I
5 don't think that anybody's really willing to let a whole cargo,
6 a small cargo ship of soybeans, let's just say, for example,
7 come in from, let's say, West Africa. I think that the chances
8 are too great, but I have not -- I have never heard of -- I
9 left West Africa about nine years ago and I had never heard of
10 anybody doing organic farming there when I was there, but I
11 didn't know everything that I know now.

12 MR. QUARCOO: Thank you.

13 CHAIR BRUCH: Thanks for the question, Franklin. One
14 quick question agronomically, Kris. You farm in Illinois
15 currently. What were some of the different agronomic
16 challenges you experienced farming conventionally in West
17 Africa? Real quickly, sorry.

18 MR. KLOKKENGA: So I would say the first thing is
19 seed supply. In order for us to get a good variety that
20 actually works in West Africa, we were using, for corn, we were
21 using a 140 day variety that was produced in the Philippines
22 and came to the United States and I brought that from Pioneer
23 and shipped that over to me. Just the cost of chemicals also
24 is -- just the cost in general is, by the time you figure
25 diesel fuel, seed, fertilizer, all those things add to your

1 cost of production and they are more in that area of the world.

2 CHAIR BRUCH: Thank you, Kris. Any other questions
3 for Kris? Good luck this season.

4 MR. KLOKKENGA: All right, thank you.

5 CHAIR BRUCH: Thanks for your time today. We have on
6 now up is Dave Bishop followed by Seth Kroeck and then Andrew
7 Smith, Sr.

8 Go ahead, Dave, please state your name and
9 affiliation.

10 MR. BISHOP: Well, thank you. My name is Dave
11 Bishop. I and my family operate Prairie Earth Farm, which is a
12 500-acre diversified farm in central Illinois, producing a wide
13 variety of crops and livestock. We've been certified organic
14 for over 20 years. I've served on the governing Board of the
15 Organic Farmers Association and I have mentored many, many
16 young farmers over the years.

17 Over the past week, I have visited with three young
18 people who were just trying to get started. One was operating
19 a half-acre size urban farm in a city of 100,000 people. He's
20 selling direct and at a farmer's market. The other two farmers
21 were in a more traditional rural setting, growing a variety of
22 fruits, vegetables, and livestock, also planning to sell direct
23 into the farmer's market.

24 They all said they were farming organically, that
25 they were farming up to the standard. And I asked them if they

1 were planning to become certified organic. Well, they said,
2 you know, the people we sell to know us. They know how we
3 farm. Often they've been to the farm. Does it really matter
4 if we get that USDA certification? We're already selling at
5 organic prices and we're doing that without all the paperwork
6 and the record keeping and inspections and all the additional
7 expense. I don't know if it's worth it. And anyway, I guess
8 if we needed some kind of a logo, wouldn't certified naturally
9 grown work just as well?

10 And I understand where they're coming from. As I was
11 reading your proposal and discussion documents, specifically
12 page 4, item 4, on ideas to reduce the burdens on low risk
13 operations, I thought, you know, these are exactly the kind of
14 changes that would attract these beginning farmers to get into
15 the USDA organic family. And I urge you to move forward with
16 these changes. Thank you.

17 CHAIR BRUCH: Dave, thank you so much. Is there any
18 questions from the Board? Okay.

19 Dave, I'm not seeing any, but your mentorship in our
20 community is just really appreciated and your experience.
21 Thanks again. Have a wonderful day.

22 All right. We're going to move on to Seth. Yes, Seth
23 Kroeck and then Andrew Smith, Sr. And on deck is Alice Runde
24 as well.

25 So Seth, go ahead. Please state your name and

1 affiliation.

2 MR. KROECK: Good morning. My name's Seth
3 Kroeck. Good morning and good afternoon to members of the
4 Board and supporting staff. Thank you deeply for your service
5 and for the opportunity to comment today.

6 I've been a certified organic grower for more than 25
7 years and I farm more than 180 acres in Brunswick, Maine. I'd
8 like to comment on the petition by the Biodegradable Products
9 Institute to change the definition of compost feedstock allowed
10 in organic production.

11 I have extensive experience using plastics in the
12 field, as well as with packaging many of our products. This
13 petition seeks to circumvent the process for materials review
14 by asking to change the definition for compost feedstock
15 instead of submitting compostable products for review under the
16 processes foundational to the NOP. Further, the petition asks
17 to justify -- seeks to justify this workaround in the name of
18 climate smart goals.

19 BPI repeatedly cites several American Society for
20 Testing Materials standards in their petition as the authority
21 for compostability and safety. The NOP has its own processes
22 for listing products, which includes organic production
23 specific expertise and public input. Additionally, the
24 petition cites a de minimis standard for compostability and
25 contamination.

1 De minimis is defined by Webster's as quote, too
2 trivial or minor to merit consideration, especially in law,
3 unquote. Uncomposted thresholds of up to 10 percent of
4 materials like plastics and polymers are currently legal in
5 industry standard. As an organic producer working with
6 biological systems, there is no input for or aspect of my soil
7 that is trivial and minor.

8 Maine is currently the agricultural ground zero for
9 testing and understanding of forever chemicals known as
10 PFAS. In the decades past, sewage sludge was promoted by state
11 and federal agencies as an expedient and safe solution to waste
12 disposal backlogs. And currently thousands of acres of
13 farmland in my state have been lost to this prior practice of
14 expediency, poisoned by PFAS compounds with half-lives of a
15 millennium.

16 In 2022, a Maine study of compostable food service
17 materials found that the rate of PFAS in compost produced with
18 these materials was 20 to 45 times that -- the rate of a
19 control compost made primarily with food waste. Biologically
20 compatible packaging is needed in the marketplace, but there is
21 much to be cautious about. The health of my farm and the
22 people I grow food for is my legacy. Please do not fast track
23 this issue. Organic production is based on healthy food grown
24 in healthy soil. Thank you very much.

25 CHAIR BRUCH: Thank you, Seth. I apologize if I

1 mispronounced your name at the beginning. Appreciate your time
2 and your perspective. I see questions from Nate and then
3 Dilip. Thank you. Nate, go ahead.

4 SECRETARY LEWIS: Yeah, thanks, Seth. I appreciate
5 your raising of these issues. I'm curious if you see any role
6 for compostable polymers of whatever nature in the organic
7 composting world.

8 MR. KROECK: Yeah, definitely. I mean, we currently
9 package products that go into national markets, both fresh
10 produce as well as frozen products. That's the way we market
11 things. I think there definitely is a place for it. I just
12 think that we need to be careful about how we're introducing
13 these products into the ecosystems of our farms. And so just
14 changing a definition I don't think is actually going to make
15 them any safer. I think we need to look very closely with
16 them. We need to figure out how are these products being
17 introduced into the waste stream? How are they being
18 introduced into these composting facilities and figure out
19 systems so they can really know what's going in and what's
20 coming out.

21 SECRETARY LEWIS: Great, thank you so much. That's
22 really helpful.

23 CHAIR BRUCH: Seth, thanks, Nate. Go ahead, Dilip.

24 MR. NANDWANI: Thanks, Seth, for your comments. I
25 understood correctly. Please correct me if I, you know, I'm

1 correct on this climate smart goals you mentioned to include in
2 the annotation. Did I hear correctly or is that something -- I
3 didn't get it. Climate smart goals in the annotation for the
4 compost feedstocks. Thank you again.

5 MR. KROECK: Yeah, that was listed in the petition
6 from BPI to the NOSB as part of their motivation for making the
7 definition change in compost feedstocks is that it was part of
8 a larger movement to move the idea of climate smart
9 initiatives, which I think is something that we all support as
10 farmers and as an industry, we need to move forward. We need
11 to make sure that the practices that we're doing on our farm
12 are a part of this effort to limit climate change, to not do
13 any long-term or short-term chemical damage to our farms, to
14 the food that we're producing. And so I definitely agree with
15 that idea. I just think that using it as part of a motivation
16 to sidestep the important foundational processes of the NOP to
17 change this definition rather than submit these materials to
18 kind of a longer and public review is where the -- using that
19 term is misguided.

20 BD. MEM. NANDWANI: Thank you.

21 CHAIR BRUCH: Thanks, Dilip, for your
22 question. Thank you, Seth, really appreciate it. Take care.

23 All right, next up, we have Andrew Smith, Sr.,
24 followed by Alice Runde, and then Matt Begley. Go ahead,
25 Andrew.

1 MS. ARSENAULT: Amy, we are not seeing Andrew on the
2 line with us. Check once more, nope, still don't see him.

3 CHAIR BRUCH: Okay, hopefully we'll get the word to
4 Andrew to be available at the end of the day. We'll move on to
5 Alice Runde next, Matt Begley, and then Stefan Baimbill
6 Johnson. Go ahead, Alice.

7 MS. RUNDE: Thank you. Hi, everyone. My name is
8 Alice Runde. I'm the operations director at the National
9 Organic Coalition. Thank you to the NOSB and the NOP for the
10 opportunity to comment and for the legwork it took to pull this
11 meeting off on schedule.

12 I'm so grateful for this space. There is nothing
13 like the NOSB and the forum it provides for our community to
14 discuss, share, debate, and grow together. This feels more
15 important now than ever. Welcome to new Board members. I'm at
16 the stage of my professional life in organic where I know
17 people before they get on the Board, and I'm very excited to
18 see them. It's also very exciting that I can now casually talk
19 about things like butorphanol, ethoxylate, and oxytocin.

20 Speaking of oxytocin, NOC is simply advocating for an
21 annotation that limits its emergency use to within two days
22 postpartum. It should not be used routinely or to increase
23 milk letdown or volume beyond those two days. Regarding the
24 consent agenda, NOC understands and respects the desire to use
25 the Board's time efficiently. However, we do not support using

1 a consent agenda for sunset materials. Grouping dissimilar
2 materials into a single vote and moving more of the discussion
3 into subcommittee work where it's not publicly accessible
4 limits transparency and public participation. Consent agendas
5 are meant for repetitive or routine matters. With new members
6 and fresh reviews each cycle, sunset review should not be
7 viewed as routine.

8 And finally, public demand for organic continues to
9 grow. We must do more to support domestic production. The
10 barriers to transition, including land access, capital, and
11 technical support are real and steep. If we want to grow
12 organic here, we must ensure that support flows to those who
13 need it most. And so I'd like to invite everyone on this call
14 to join me in a moment of silence. This pause is to
15 acknowledge all the topics, words, and ideas we have been told
16 do not fit in the current landscape and the issues that
17 continue to affect organic producers, maybe some more than
18 others, whether or not they are spoken aloud here today.

19 CHAIR BRUCH: All right, Alice, I'm going to jump in
20 here. I wanted to respect the moment of pause. I wanted to
21 see if you had anything else.

22 MS. RUNDE: Yes, I do. With new --

23 CHAIR BRUCH: Sorry about that.

24 MS. RUNDE: With new incredible members joining the
25 Board, now is the perfect time to set the tone for intentional,

1 careful, and forward-looking leadership. We hope the Board
2 will continue identifying where the barriers are highest and
3 help us find ways to lower them so more producers feel welcomed
4 and supported on their path into organic. Thank you again for
5 the opportunity to comment and for your incredible leadership
6 in this work. Now I'm really done.

7 CHAIR BRUCH: No problem. Thanks again,
8 Alice. Sorry for that interruption. I wanted to be respectful
9 there.

10 Okay, are there any questions for Alice? Alice, just
11 a quick question. I was just wanting to understand a little
12 bit more of the barriers to transition. I heard the ones that
13 you articulated. Is markets, especially for transition growers,
14 is markets anywhere on the radar of the things that you're
15 investigating?

16 MS. RUNDE: Yes, absolutely. And I think, as Abby
17 mentioned in her comments on Monday -- on Tuesday, I think that
18 the Organic Marketing Development Grant Program and Transition
19 to Organic Partnership Program, those two grants and
20 cooperative agreements are really huge opportunities to
21 investigate those barriers a little more thoroughly. So we're
22 looking at those fundings being restored productively.

23 CHAIR BRUCH: I do have one other comment on the PDS
24 item that you had brought up about the sunset review
25 efficiency. Is there any ideas you might have for, if we just

1 put the brackets around the voting efficiency piece, would you
2 particularly be in favor of voting efficiency brainstorm
3 innovation on the Board?

4 MS. RUNDE: Thanks so much for that question,
5 Amy. I'm going to let Steve Ela answer that question, and I
6 think he's up in like two or three speakers.

7 CHAIR BRUCH: Okay, yes, we have him on our
8 radar. Okay, thanks, Alice. Any other questions for Alice?

9 Okay, thank you. We really appreciate your time
10 again. Okay, we're going to move to Matt Begley, followed by
11 Stefan Baimbill Johnson, and then Steve Ela.

12 Go ahead, Matt.

13 MR. BEGLEY: Hi, my name is Matt, excuse me, Matt
14 Begley. I am the materials specialist at Ohio Ecological Food
15 and Farm Association, and I've got some comments about compost
16 feedstocks.

17 First, we greatly appreciate the Board's
18 acknowledgement, excuse me, acknowledgement that synthetic
19 compost feedstocks can only be included in organic production
20 through the national list process. I think that's an important
21 point that we're all on the same page with.

22 With regards to UREC, unavoidable residual
23 environmental contamination, we believe that should only apply
24 to substances found in the environment or incidental
25 substances, not materials intentionally added to a feedstock or

1 to compost. Compost feedstocks are organic inputs that should
2 be reviewed the same as any other input.

3 Many of the substances that are considered UREC are
4 extremely undesirable, and their inclusion in organic compost
5 should be questioned as well. However, intentionally adding
6 what could amount to a larger source of contamination requires
7 more scrutiny.

8 We appreciate the ongoing research topic of research
9 on the fate of prohibited substances such as antibiotics, heavy
10 metals, and pesticides in compost piles. And the same research
11 into compostable polymers would be crucial before making a
12 determination on their allowance. Reliance on ASTM methods
13 does not appear to be sufficient, and we await the pending
14 technical report to learn more about the specific substances in
15 these compostable polymers.

16 Having said that, OFA opposes the addition of any
17 synthetic polymer to the national list as a compost feedstock,
18 regardless of its designation as compostable or biodegradable.
19 We believe that the breakdown to microplastic particles and
20 chemical constituents of the polymers pose a threat to the
21 health of the soil microbiome, as well as to broader
22 environmental and human health that are not consistent with
23 organic production. Furthermore, the benefit seems to only be
24 for producers of these compostable products and not the organic
25 industry, as the additional compost feedstock sources are not

1 essential, and as mentioned, would likely have a negative
2 impact on soils.

3 I can see how this would open the avenue for more
4 post-consumer food waste, but I don't think there's a lack of
5 compost feedstocks currently, and as mentioned, adding this
6 contamination would not be an overall benefit. Thank you.

7 CHAIR BRUCH: Matt, thank you so much for your time
8 today. Any questions for Matt? Matt, I'm not seeing any, but
9 really appreciate the point you made about making sure all
10 voices are heard in the equation of compost. So thanks for
11 bringing that up to above radar here.

12 All right, we're going to move on to Stefan Baimbill
13 Johnson, followed by Steve Ela, and then Mindy Jeffrey. Go
14 ahead, Stefan.

15 MS. ARSENAULT: Amy, we are not seeing him on the
16 line with us. Let me just double check. Maybe he has
17 joined. No, not seeing Stefen or Stefan, I don't know how you
18 pronounce.

19 CHAIR BRUCH: Okay, well, thank you, Michelle, for
20 that. Hopefully he will join us at the end of the day. We
21 will move to Steve Ela, followed by Mindy Jeffrey, and then
22 Gordon Merrick.

23 Steve, go ahead.

24 MR. ELA: Good afternoon or good morning. I am Steve
25 Ela, and I'm an organic fruit grower in Western Colorado, and

1 as a staff member of the National Organic Coalition, I would
2 like to just say welcome to the new Board members. I'd like to
3 remind you all that NOC is a consensus organization based on
4 with members that span the organic industry from retailers, co-
5 ops, consumer safety organizations, certifiers, and educators.

6 Before I dive in, I want to say to the NOP staff, we
7 in the organic community recognize the immense pressure and
8 uncertainty being placed on staff. We can't imagine the
9 demoralizing environment you are working in, but we want to
10 loudly and strongly say that we appreciate your work, and we're
11 doing all we can to support you through these difficult
12 times. You, the staff, are critical to organic integrity and
13 the functioning of the National Organic Program and this NOSB
14 process. Thank you for what you do. We can't do this without
15 you.

16 NOC strongly supports the compost proposal that
17 compost feedstock requirements must involve the NOSB and public
18 comments. Regarding the discussion document on what compost
19 feedstock should be allowed, NOC wants to reiterate our
20 position to the allowance of synthetic compostable materials
21 with the possible exception of small produce stickers. We have
22 submitted substantial comments to support our position that
23 they should not be allowed, but put simply and shortly, OFTA
24 requires that any synthetic material allowed in organic
25 production will not be harmful to human health or the

1 environment and is necessary to the production of the organic
2 product. Synthetic compostable materials do not fulfill either
3 of these criteria. Adding these materials to organic compost
4 will unnecessarily add PFAS, micro and nanoplastics, among
5 other plasticizers and additives. They are not necessary to
6 the production of the organic product, and we now have and can
7 continue to have organic compost without the additions of these
8 synthetics.

9 So, and I say this respectfully, no matter how you
10 feel about closing loops and solving green waste issues, the
11 bare bones of OFTA compliance should cause you to reject
12 allowing these synthetic materials.

13 L-Malic acid. NOC agrees that L-Malic acid should be
14 reclassified as synthetic handling material. However, we once
15 again caution that this unwittingly sets a precedent of
16 allowing excluded methods to be used in organic material. It
17 is likely that the bacteria used in the fermentation process to
18 produce fumaric acid are engineered and that the fumaric acid
19 is then used to produce L-Malic acid.

20 NOC continues to push the NOSB to discuss and set a
21 policy of how far back we look in the production chain to
22 determine if a material is the product of excluded methods.

23 Finally, NOC supports the NOSB work on risk-based
24 certification and residue testing. One thing to consider is
25 that to be able to reduce the paperwork and costs for low risk

1 operations, we must also be reducing the burden on
2 certifiers. A certifier can only charge a reduced fee if the
3 certifier themselves have reduced costs and burdens. And since
4 we are the National Organic Coalition known as NOC, it's time
5 for a NOC NOC joke.

6 Amy, can you help me? NOC NOC.

7 CHAIR BRUCH: Who's there, Steve?

8 MR. ELA: Do.

9 CHAIR BRUCH: Do what?

10 MR. ELA: So, residue.

11 CHAIR BRUCH: Do who? Sorry, do who?

12 MR. ELA: Do who, okay. So residue, NOC agrees that
13 we must expand the list of materials we're testing or to keep
14 up with current agricultural and handling practices. And we
15 continue to support the work at the NOSB on this topic.

16 CHAIR BRUCH: Thank you for that NOC NOC joke. And
17 I'm going to open it up to questions. Go ahead, Brian,
18 followed by Dilip.

19 BD. MEM. CALDWELL: Well, thanks so much,
20 Steve. Wonderful to see you remotely.

21 What I'm wondering is with your really broad
22 experience with the NOSB and the organic community, how can we
23 best approach this how far back issue? It sort of doesn't
24 necessarily come out in a specific review. It's sort of a
25 broad topic. How can we get our hands onto that and deal with

1 it? Really appreciate it.

2 And I just got to say, feedback to everybody. These
3 comments are so useful and we really, really, really pay
4 attention to them. So thank you so much for all these
5 comments.

6 MR. ELA: Brian, it's a tough one. And I think we've
7 avoided the issue because it is a tough one. NOC ideally wants
8 to say that no excluded methods anywhere in the process. And
9 we recognize that there are many steps in producing, especially
10 handling materials, not necessarily agricultural ones, and that
11 it is difficult to go back 20 different steps. But I think the
12 Board needs to take this on as a work agenda item. We need to
13 have a public discourse around it and then just establish some
14 very clear guidelines of anywhere in the process, two steps
15 back, three steps back.

16 And just so that as we evaluate materials, whether
17 it's gums or L-malic acid or other things, that we have a
18 criteria that we can evaluate against, rather than just kind of
19 randomly letting these things in without actually making a
20 policy about it.

21 BD. MEM. CALDWELL: So I'm hearing a specific work
22 agenda item on that.

23 MR. ELA: On fermentation, especially, and how far
24 back we look in these processes.

25 BD. MEM. CALDWELL: Okay, thank you so much, Steve.

1 CHAIR BRUCH: Brian, go ahead, Dilip.

2 MR. NANDWANI: Thanks, Amy. I first echo what Brian
3 mentioned that we do pay attention to NOC's comments and we do
4 read carefully. So thanks, Steve, for your insight.

5 I have two clarifications, basically, not really
6 questions. One is on CRISPR and second on research priorities,
7 as you mentioned in your letters and the public comments.

8 So this time I read that the CRISPR and excluded
9 methods have some new information. It could be causing cancers
10 in animals and plants. What can you tell a little bit more
11 about if you have any information?

12 The second is in research priorities. You mentioned
13 about the use of landscape fabrics, the multiple uses or
14 multiple times versus single use plastic on the organic
15 farms. So you're very knowledgeable. What can you think that
16 the impact could be for longer term use of landscape fabrics on
17 soil fertility, microbes, of this landscape fabric? So any
18 insight or information? And thank you again. I appreciate
19 your comments.

20 MR. ELA: I'll try and answer very succinctly just so
21 Amy doesn't get too nervous here. But in terms of CRISPR, I
22 think in our comments, we did put a citation noting some of the
23 issues with mutagens and carcinogens. And the bottom line is
24 that CRISPR is not as crisp as it's made out to be. And that
25 in that gene editing, there are still issues with not being

1 exact and those inexact cutting and splicing does cause
2 mutagenesis and some of these other things. And so I refer you
3 to that reference, but it is a concern that is coming out.

4 In terms of plastics, I think we really need to
5 understand if we're using like the woven plastic mulch that is
6 used mulch a year, certainly it reduces plastic use, but it
7 also does degrade over time and could be putting microplastics
8 in the soil. It also does have effects on soil biology and
9 soil organic matter. We've seen that on our farm and research
10 projects where under the woven fabric, the soils become much
11 more difficult, much harder.

12 MR. NANDWANI: Thank you.

13 CHAIR BRUCH: All right. Thank you, Steve, for being
14 succinct. Kyla and then Nate. Oh, Kyla, go ahead.

15 BD. MEM. SMITH: So NOSB is not the only responsible
16 party in regards to material review. Obviously certifiers and
17 material review organizations play a large part in that and are
18 evaluating materials and the presence of excluded methods in
19 that material review.

20 So with that, like whose responsibility is it really
21 with this excluded methods topic with fermentation? Should
22 that rely with the Board or should that fall to certifiers in
23 their review process and their policies?

24 MR. ELA: I think it has to rely on the Board setting
25 an overall policy because otherwise there's going to be

1 differences between certifiers. I mean, we already know that,
2 you know, is it okay to use a GMO crop that is fermented and as
3 long as there are no traces of that crop in the subsequent
4 material, a lot of certifiers are allowing that, but not
5 necessarily all. If there's no traces of this GMO bacteria
6 that actually does the fermentation, is that okay or not? And
7 I think if we just leave it to certifiers, we're just going to
8 see wide discrepancies. I really feel like this is a Board
9 level topic that sets the tone for all certifiers.

10 CHAIR BRUCH: Thanks, Kyla. Okay, Nate, wrap this up
11 here.

12 SECRETARY LEWIS: Yeah, just wanted to touch on the
13 consent agenda trial that we're doing this year. And certainly
14 our intention was not to stifle any robust discussion on each
15 material. It was more as an observation that many materials
16 don't get discussion in the fall and are unanimously relisted.
17 So just trying to consolidate that voting process was the
18 intention behind the Board trial this year.

19 So I'm just sort of curious, like, if we build in
20 these safeguards, what is the risk to the community, to each
21 sunset vote on just simply consolidating the voting step of the
22 relisting process?

23 MR. ELA: Yeah, Nate, I totally get it. I applaud
24 you trying to figure this out. Rick Greenwood had a proposal,
25 a consent agenda that we rejected a few years ago, so we keep

1 revisiting this. I guess I just fundamentally think, and I
2 don't know how to say this well, I know as a Board member, I
3 was often pressed to read comments. I did it, but it was often
4 sometimes at the last minute.

5 And so I really felt like there were times that I was
6 maybe not going to give a comment on material that until
7 suddenly the Board discussion came up, and even though it was
8 kind of a slam dunk material, there might be an annotation
9 change, or there might be a subtlety that I would have been
10 hesitant to pull it out of the consent queue just to talk about
11 that. But when it's actually presented, I would have been more
12 likely to raise my hand and say, well, I think we should
13 consider an annotation for this in the future. That it might
14 not have been major enough to pull it out, but still was
15 important to get into the record.

16 So I'm just, and I also think just having all the
17 discussion subcommittee, it's just really important. The MSB
18 process is so transparent and having the individual vote on
19 materials, it's so easy to go back and look at past votes and
20 past transcripts and parse that out and see if there was any
21 discussion. It just makes life easier. So I applaud trying to
22 be efficient, but I think the transparency and the vote record
23 is just really important in this process.

24 CHAIR BRUCH: Thanks, Nate. Thanks again, Steve, for
25 your time and leadership. Appreciate it. We'll have to

1 practice knock-knock jokes later. Okay, moving on.

2 We have Mindee Jeffrey, we have Gordon Merrick, and
3 then Nate Powell-Palm. Go ahead, Mindee.

4 MS. JEFFREY: Hello, welcome. My name is Mindee
5 Jeffrey and I am a former NOSB member and I am currently
6 unaffiliated. So welcome to all the new Board
7 members. Excited for your Board terms and welcome to Chris
8 Purdy. Thank you for serving the organic community.

9 And I wanted to say a deep heartfelt thank you to all
10 the NOP staff because we went through a pandemic together,
11 figuring out virtual meetings, and you guys had a lot of staff
12 changes and you are exemplary public servants and I'm grateful
13 to you. So my comments today, I apologize, they're handling
14 and crops, not materials and crops. And so I'm really grateful
15 that we live in this transparent, functional democracy of the
16 organic system. And so I'm glad that an ethanol producer would
17 have the opportunity to petition organic for the use of
18 ethylene as a substance in organic.

19 But I am passionately against it. I don't think that
20 using a synthetic pesticide is a good idea in organic systems
21 unless there is a pretty huge demonstrated need from the
22 producers. And I think that the write-up acknowledges that it
23 may not be essential to all organic producers, but that it
24 could be essential to support the marketplace. And I think
25 that regional development is really important for organic

1 success. And I have been a retailer in Minnesota, California
2 and Vermont through winters in the last six years, and I
3 haven't seen us in those marketplaces have issues with potatoes
4 and onions. We've always had supply as far as my experience in
5 those marketplaces there is concerned. And I really don't want
6 to disadvantage local producers, especially over the potential
7 for importers.

8 And so I hope that you all potentially send this one
9 back to subcommittee and just see if you actually find
10 producers who actually feel like they need it to support
11 production in their marketplaces. So appreciate you
12 considering my comments along that lines.

13 And then on the compost front, I really appreciate
14 all the work that's going on and all of the conversation that's
15 going on. And I do think that the NOSB has provided BPI with
16 an equitable path for considering a substance to be petitioned
17 by the organic community. And I do think that the NOSB process
18 and the national list process is clearly outlined in our
19 regulations and that we have done everything to answer the call
20 to evaluate these substances equitably, and that it is really
21 important that the Board and the community do continue to
22 advocate with the NOP and with the USDA to support our
23 regulations and our process and to not allow adjacent
24 industries to petition the USDA directly to just change
25 definitions to circumvent the review process. Thank you.

1 CHAIR BRUCH: Excellent. Thank you so much, Mindee,
2 for joining us today. I want to open it up to questions. I
3 see one from Nate. Go ahead, Nate.

4 SECRETARY LEWIS: Yeah, at risk of using up all my
5 questions, Amy's going to shut me off here soon.

6 I really have always respected and consider your
7 opinion really valuable, particularly when it comes to
8 materials and your experience in the retail space on the
9 ethylene petition, I think is tremendously valuable. One of
10 the things that I have heard from producers here in Washington
11 is they're interested in ethylene because it would allow them
12 to stop using clove oil, which is what they're currently using
13 to keep those potatoes in the markets all winter long, because
14 that is caustic and not pleasant to work with. So it's sort of
15 like a worker safety thing, but it's also non-synthetic.

16 So I'm just like, I'd love to engage your brain on
17 this non-synthetic/synthetic hierarchy when you also then have
18 real world negative impacts of the non-synthetic one, where you
19 have a potentially better synthetic alternative. It's just a
20 conundrum that I'm wrestling with on the topic, and I'd
21 appreciate your opinion.

22 MS. JEFFREY: Yeah, I definitely appreciate the
23 tension there, and I definitely want to protect folks from the
24 caustic nature of handling that other substance, but I just
25 can't -- for me, it's just about -- it's a byproduct of the

1 ethanol industry, and I'm so romantic about when my potatoes
2 sprout in my cabinet, I want to plant them. And I've seen so
3 many social media posts about, it's spring, don't you want to
4 plant your potatoes? Go to the store and buy an organic sweet
5 potato, and then do this. And I'm like, ah, marketing-wise, I
6 just don't think we can handle putting a synthetic pesticide on
7 the national list. It's just -- it's a marketing nightmare,
8 and it's this -- byproduct of the ethanol industry isn't where
9 my heart of organic goes. And so maybe we do need a solution
10 to the clove issue, but I'm not sure this is the one.

11 CHAIR BRUCH: Right. Thank you, Nate. Thanks,
12 Mindee. Logan, go ahead.

13 BD. MEM. PETREY: Hey, Mindee, great to see you. So
14 a question on the ethylene as well. And so when you're talking
15 about the regionality concerns, so as a retailer, have you
16 noticed the shifts in the seasons, maybe, and maybe things have
17 to be sourced from further away because potato production does
18 change? So are you saying that maybe adding something that
19 helps with sprouting might enable things to come from further
20 distance? Or I was just trying to get the regionality thing --

21 MS. JEFFREY: Oh, I was hoping for less
22 distance. Yeah, I'm just hoping for --

23 BD. MEM PETREY: Correct, okay.

24 MS. JEFFREY: Yeah, I love the gold standard thinking
25 of local organic as the best thing to do to support the food

1 system. And so maybe I'm being a little idealistic about how
2 the potatoes arrive in the different marketplaces, but I
3 haven't had the experience as a natural food shopper and an
4 organic retailer in three different marketplaces that we ran
5 out of them or that we had supply problems. And so I couldn't
6 give you any metrics on the actual distance of how far they're
7 coming from in the different marketplaces. But I haven't
8 experienced the supply issues with those categories.

9 BD. MEM. PETREY: Sure, because I was thinking with
10 ethylene, or a sprout inhibitor may allow a longer season or
11 being able to hold it longer within that region. So it might
12 help or assist the locality of it. And I had another question
13 from there.

14 MS. JEFFREY: They're great questions, Logan, and I
15 think going back to subcommittees, because maybe that could
16 work for you guys this time, because if you don't have a real
17 clear identification from actual producers on this, I'm not
18 sure with your written comments, like what came back in this
19 cycle, given the unusual nature of this meeting cycle.

20 CHAIR BRUH: All right, well, thank you. Do you have
21 another question, Logan?

22 BD. MEM. PETREY: No, and I was just going to
23 mention, as far as being able to plant at any time, that's not
24 as far as in the production scale. Like in Florida, we only
25 have, or North or South Florida, or North Florida, South

1 Georgia, we only have just a few weeks of the year that we're
2 able to plant and get a successful crop out of. And so just
3 having the sprout and just plant whenever something might
4 sprout, it's not real, for us at least, realistic on that. And
5 I can see that being in other regions, just because of potatoes
6 are very susceptible to cold, you know, they'll die once they
7 get a good frost on them, or if it's too terribly hot, they'll
8 rot in the ground. And so there are some limitations
9 agronomically, you know, based on the season for that. Okay,
10 so thanks for.

11 CHAIR BRUCH: No problem. Thank you, Logan, for
12 jumping in there. Really appreciate it. Mindee, thanks for
13 joining us. Good to see you again, dear friend.

14 All right, we're going to move on to Gordon Merrick,
15 followed by Nate Powell-Palm, and then Ellie Hudson. Go ahead,
16 Gordon.

17 MR. MERRICK: Hi, everyone. Thanks. I'm here with
18 the Organic Farming Research Foundation as the Senior Policy
19 and Programs Manager. And just want to say thanks for the
20 opportunity to provide some comments before the committee in a
21 remote context. I just really want to focus my comments on the
22 critical role that NOSB plays in helping direct the limited
23 amount of organic research funding available to make sure that
24 they stay focused on high-impact topics. You know, we'll be
25 presenting some written comments on the same subject, but like

1 NOSB's materials review and standards recommendations, the
2 annual research priority setting process as displayed with the
3 2025 recommendations plays a really unique and indispensable
4 role.

5 As the discussion right before my comment kind of
6 highlights, it's a really strong conduit to ensuring that the
7 organic sector, not just from agronomic producers, but also
8 supply chain businesses and entities to be able to communicate
9 and document topics that would be really important in high-
10 impact research topics. And from the researcher perspective,
11 that really offers a high-quality, vetted and community-
12 informed list of topics for high-impact research and that will
13 be assessing real-world questions and topics that will help the
14 industry in total.

15 So -- and also, you know, they're also impacting and
16 shaping USDA programs by being mentioned in requests for
17 applications in OREI and ORG, the two flagship organic
18 agricultural programs, but also in congressional
19 appropriations, report language directing USDA to fund organic
20 research through other research competitive grant programs.

21 So, you know, all told, it's a very high-impact
22 thing that the NOSB continues to produce and also has an
23 ability to update and reiterate and reaffirm different research
24 priorities to just both reflect the ongoing and persistent
25 challenges that some farmers and organic producers and supply

1 chain businesses face, but also some of the more emerging
2 challenges as we're hearing right when it comes to compost and
3 PFAS contamination. So yeah, we'd just, again, like to, thanks
4 for the opportunity and happy to answer any questions, but
5 we'll be submitting some more detailed written comments as
6 well.

7 CHAIR BRUCH: Excellent. Thank you so much, Gordon,
8 for being here today. I see a hand from Carolyn, go ahead.

9 BD. MEM. DIMITRI: Wow, thanks so much, Gordon, for
10 being here today. I wonder if you could talk to, have you
11 thought about how do we close the loop between research and the
12 Board and then research and farmers and farmer needs and
13 research, like beyond just say the NORA report? It's something
14 that I struggle with as a researcher.

15 MR. MERRICK: Yeah, I mean, that's one thing that
16 we're -- we definitely are starting to recommend this year is
17 trying to come up with or think about some type of system to
18 assess the priorities and the level of kind of funding that has
19 been dedicated to address those priorities. Because we, I
20 mean, we can all look through the USDA's data enterprise and
21 look at the research studies that are addressing some of these
22 topics. But when we're thinking about this from like an action
23 oriented materials and things like that to really see if these
24 are continuing to -- if the research products are getting to
25 the communities that need them, right? Because I think that's

1 one of those things that is kind of hidden in that question
2 that you might be asking where it's like connecting and closing
3 these loops is just making sure that the information that's
4 already out there is getting to those farmers and
5 producers. And a lot of times it's out there, but there hasn't
6 been a great way to communicate that. So that's why OFRF has
7 developed that organic research hub and preventing -- or
8 providing just some of that catalog research to try and break
9 down some of those.

10 But when it comes to progress reports and things, I
11 think there is room for NOSB to explore like an expanded role
12 there.

13 CHAIR BRUCH: Excellent, thank you, Gordon. Thanks,
14 Carolyn. Go ahead, Kyla, for a quick question here.

15 BD. MEM. SMITH: Yeah, I'm glad you mentioned the
16 resource hub because I was going to put a plug in that cause
17 it's super cool and wondered if it was still too new yet or if
18 there has been some of that feedback loop baked into that
19 hub. And if not, could there be like, I don't know, just, and
20 maybe it's too soon to know, but I don't know if you want to
21 comment on that at all.

22 MR. MERRICK: Yeah, no, I mean, we're consistently
23 like re-addressing how we're getting feedback from organic
24 producers as it comes to research priorities because we have
25 that longstanding National Organic Research Agenda report that

1 comes out every few, like five to seven years. But when it
2 comes to like trying to close that feedback loop through that
3 exact hub, I don't think we've built that in outside of some
4 like surveys and things.

5 But yeah, I don't think that is something we've
6 really investigated as having that be a tool to assess if NOSB
7 research priorities are being researched or not. But I think
8 it could be, it would just be like back-ending a solution, I
9 guess, a little bit.

10 CHAIR BRUCH: Excellent, thank you, Kyla. Gordon, I
11 actually have one quick question for you. I apologize to jump
12 in here with it, but I wanted to see how the NOSB, because we
13 have this community list that we publish for the research
14 priorities in our materials group, how we can closely reconcile
15 our list to what's actually getting funded and increase
16 continuously that percentage because this document gets a lot
17 of public feedback and comments from all members of our
18 community. So how can we elevate this as these are the
19 projects that need to be funded? And if you, you know, just
20 work really closely together on that. Do you have any ideas
21 there, quick ones?

22 MR. MERRICK: Yeah, I mean, I think continuing to do
23 what y'all are doing, because it is really having that impact
24 in a lot of different circles, you know, especially as OREI has
25 gotten to \$50 million funding and like the pool of organic

1 research is now significantly higher than it was in 2018, right
2 at the beginning of this farm bill cycle, like it's over double
3 what that pool was at that time. So I think we're just
4 starting to see the results of that expanded funding, starting
5 to come out. And a lot of those results and projects have been
6 focusing on NOSB priorities.

7 And, you know, I don't know the specific rules
8 around, you know, communicating with committee staff, but
9 making sure to communicate to appropriations committee, you
10 know, here are updated priorities, maybe -- because there are
11 pieces of appropriations language that cite to research
12 priorities to like kind of point USDA to look at. So, yeah, I
13 think y'all are doing great work so far. I think it's just
14 like starting to catch up and percolate through.

15 CHAIR BRUCH: Okay, thanks for those tips. Really
16 appreciate your time here today, Gordon, and your involvement,
17 especially those written comments that you promised. All
18 right, we'll go to Nate Powell-Palm next, then Ellie Hudson and
19 Amber.

20 MS. ARSENAULT: Amy, Nate is having internet issues
21 out there in Montana, and he is going to relocate and join us
22 again later.

23 CHAIR BRUCH: Okay, excellent. Well, thank you,
24 Michelle. We will try to catch him at the end like a few
25 others. We will go to Ellie Hudson next, followed by Amber

1 Sciligo and then Gwen Wyard. Go ahead, Ellie, state your name
2 and affiliation.

3 MS. HUDSON: Thanks, Amy. Hello, I'm Ellie
4 Hudson. I'm the Executive Director of the Accredited
5 Certifiers Association, ACA. Our mission is to ensure
6 consistent interpretation of organic regulations through
7 collaboration and education among accredited certification
8 agencies. Welcome to our five new Board members. Thank you,
9 and thanks to the continuing members for your service to
10 organic.

11 I'm here to talk about two topics, current threats to
12 the USDA Organic public/private partnership and a brief comment
13 on our perspective on organic seed and the ongoing challenges
14 of "commercial availability." I'm co-signing the sentiments of
15 other commenters to express serious concern that federal
16 staffing reductions could negatively impact the public/private
17 partnership of USDA Organic. Besides the obvious negative
18 impact to our valued public servants in the National Organic
19 Program, staffing reductions would all but guarantee grinding
20 slowdowns in certifiers' ability to carry out our work.

21 There has been recent and significant growth in
22 certified organic operations. For example, an increase from
23 approximately 38,000 in March of 2024 to nearly 48,000
24 currently based on USDA Organic Integrity Database data.

25 ACA attributes this growth partly to the

1 Strengthening Organic Enforcement, or SOE rule, and the
2 Transition to Organic Partnership Program, or TOPP, introduced
3 in June 2022. Certifiers need adequate NOP staffing to manage
4 the expanding program and enforce new regulations
5 effectively. Staffing shortages would also create a
6 compounding effect, remaining employees facing unmanageable
7 workloads, resulting in a slower processing of applications and
8 significant backlogs, as two possible examples.

9 ACA urges the Board and the larger community to
10 double down on our efforts to protect this valuable
11 public/private partnership and that decision-makers reconsider
12 any staffing reductions and implement a more measured approach.

13 Other commenters have mentioned the Organic Seed Task
14 Force and ACA is proud to represent our members on this task
15 force. While other commenters have already noted both the long
16 length of time already dedicated to the topic of commercial
17 availability and the overall disparity between the theory and
18 practice of commercial availability, we'd like to simply ask
19 the Board to consider whether this may be an area to start
20 flexing the muscles of taking a risk-based approach to this
21 challenge.

22 The goal of continuous improvement, a risk-based
23 approach could be a fresh approach toward bringing the reality
24 closer to the intention of the language. As many ACA members,
25 particularly those that are also accredited to the EU standard

1 have noted, the EU scheme already utilizes a risk-based
2 approach and we would be wise to increase existing
3 collaboration and relationships with our counterparts in the EU
4 system.

5 As noted by my colleague, Marnie Carlin on Tuesday,
6 ACA is actively involved in ongoing efforts to ensure risk-
7 based approach does not sacrifice any integrity ever. And we
8 especially have a responsibility and espoused commitment to
9 consistent implementation across certifiers. We'd welcome the
10 opportunity to explore this question further with the Board or
11 with other collaborators. Thank you.

12 CHAIR BRUCH: All right, excellent, Ellie. Thank you
13 so much. Are there questions for Ellie?

14 Ellie, I'm going to ask you a quick question on risk-
15 based certification. I know there's been some comments,
16 definitely in the written form that more time, more time on
17 these high-risk operations is needed, maybe a little bit less
18 time on potentially some lower impact operations, but outside
19 of time, I mean, time doesn't always generate information, it
20 can, but are there tools that we need to really develop or
21 focus in on outside of just time to identify more efficiently
22 acts of fraud?

23 MS. HUDSON: Sure, and I'll take it a step further
24 and say that often time is woefully insufficient at predicting
25 correlation with complexity. And I think Marnie mentioned this

1 on Tuesday, when we talk about a risk-based approach, risk of
2 what? And so we're talking about risk of non-compliance to be
3 really specific about that. And I think that certainly we all
4 want our time back, right? I think that acknowledging that's
5 really important.

6 Kyla might want to chime in on this because in fact
7 ACA has been collaborating with Kyla on behalf of the NOSB
8 along with specific staffers at NOP and ensuring that this
9 conversation is kind of always a triangle, the certifiers, the
10 NOSB and the NOP kind of working together and ensuring that we
11 are exploring every opportunity to collaborate.

12 Having said all that, we started a workshop in our
13 ACA conference in Richmond, Virginia in January. And we
14 actually looked at like five specific areas in the regulation
15 where a risk-based approach is in theory possible and then ask
16 members to brainstorm and kind of come up with that. And so
17 Kyla was one of the leaders of that along with Marnie and
18 certainly, I mean, there's all kinds of things besides time
19 that come out of, well, is there ease of entry requirements,
20 barriers to entry, is that something to look at? That's one
21 example.

22 CHAIR BRUCH: Excellent. And, Kyla, thank you for
23 highlighting that. I'm going to have you, Kyla, remember that
24 for our discussion next week. One last question really
25 quickly, Ellie.

1 Benchmarking, does ACA benchmark with other
2 industries that are needing to certify for different
3 credentials or protect against fraud? Is there a level of
4 benchmarking that can be done? I just remember when I worked
5 at General Mills, we benchmarked with Air Force and NASCAR,
6 things that weren't traditionally in our space. So just
7 questioning that.

8 MS. HUDSON: Yeah, well, many of our members, I'll
9 say first of all, especially those outside the U.S., certify
10 multiple schemes. And there are some in the U.S. that do that
11 as well. So some of that is happening naturally at the
12 certifier level because they have exposure and experience with
13 multiple schemes. And I think that's been really helpful in,
14 for example, ACA working groups and things like that.

15 I would say as ACA, who isn't a certifier, we really
16 look to collaborate most closely with our counterpart in
17 Europe, the EOCC. We've really been expanding that over the
18 last year, especially. And not just as I mentioned, learning
19 about a risk-based approach, but also consistency for us,
20 because many of us, we have a lot of the same members. So
21 that's an area where that collaboration and benchmarking and
22 idea sharing, whether it's a little bit less formal, that's one
23 area that I think is probably the most positive.

24 CHAIR BRUCH: Excellent. Thank you so much,
25 Ellie. I appreciate your time today. Yeah, and all you do.

1 Okay, we're going to move on to Amber Sciligo,
2 followed by Gwendolyn Wyard, and then Jackie DeMinter. Amber,
3 please state your name and affiliation.

4 MS. SCILIGO: Hi there, thank you. My name is Amber
5 Sciligo, and I am the Senior Director of the Organic Center.

6 The Organic Center is a nonprofit organization that
7 communicates research on organic. We also collaborate with
8 academic and other U.S. and global organizations to help fill
9 gaps in our scientific knowledge. We have submitted detailed
10 written comments, but today for the record, I just wanted to
11 highlight some research needs in terms of priority shifts, and
12 also mention some topics that we think are missing and should
13 be added to the very comprehensive list you already have. So
14 thank you for that.

15 Okay, so for priority adjustments, we'd like to see
16 the following three topics elevated in priority, just based on
17 their ability to better develop the market, as well as fill
18 some critical knowledge gaps for the organic sector. Those
19 topics are: one, whole farm ecosystem service assessments to
20 determine the economic, social, environmental impact of farming
21 systems. We recognize that this is currently listed as a top
22 priority, but we'd like to see it elevated within that list if
23 there's a ranking there, factors impacting organic crop
24 nutrition and organic and conventional nutrition comparisons,
25 and then strategies for the prevention, management, and control

1 of problem insects, diseases, and weeds in light of changing
2 climate, et cetera, emphasizing weeds and the need for this
3 research in the Southeastern region of the U.S.

4 We would place the highest priority on whole farm
5 assessments. They are arguably -- they will require the
6 greatest injection of resources to execute, but there is a
7 general deficiency in those other research topics, or
8 deficiency in results for those research topics. And those
9 would be really helpful for farmers, consumers, policy makers,
10 and businesses, especially those businesses that are making
11 investment decisions that are influenced by environmental
12 sustainability goals and science-based targets.

13 For additional research topics, based on the feedback
14 that we've received during our stakeholder engagement, we
15 recommend the following research topics be added. And these
16 are ranked by our priority. So the first two that I'll
17 mention, we think should be added to the top priority list, and
18 those are the assessment of health benefits and outcomes of
19 organic in terms of nutrition, and in terms of avoiding
20 chemical residues or spray drift in rural areas. Also state-
21 by-state economic impacts of organic farming. And then we have
22 the assessment of organic and conventional impacts on water
23 quality, particularly drinking water quality, and improving
24 dryland farming using organic practices.

25 All of the crop research questions we think should

1 encourage a focus on minor crops and varieties. And then we
2 have also heard many calls for the improvement of the
3 effectiveness of research extension programs. So I want to
4 call this out because it's more of a focus on extension
5 outreach, though it does include a research component. And
6 then for the plastic reduction, we'd like to see research
7 across the entire supply chain, not just -- and I can leave it
8 there.

9 CHAIR BRUCH: Okay, thank you so much, Amber, for
10 your time today and those additions to the research
11 priorities. Any questions for Amber? All right. And
12 hopefully you'll submit these to the written doc if you haven't
13 already. Excellent.

14 Oh, I see Franklin's hand. Go ahead.

15 MR. QUARCOO: Amber, if you don't mind, if you can
16 expand a little bit on the effect on extension programs.

17 MS. SCILIGO: Yes, I would be happy to. So there has
18 been some preliminary work that has come out of the University
19 of Kentucky that has shown that some extension contact hours
20 are not -- they're disproportionately distributed in a way that
21 they, basically they're reaching more white communities than
22 black communities that match, it's mismatching the proportion
23 of the populations. So beyond -- and so more work needs to be
24 done to assess who is getting the information from the
25 extension programs. But then also a lot of the work that we've

1 been doing, particularly in the Southeast, we keep hearing from
2 farmers that there is a continued mismatch of information
3 that's given to them. It's either not relevant or the
4 information, the way that it is delivered is not necessarily
5 culturally appropriate. And the way, especially when it comes
6 from a top-down manner.

7 So incorporating the communities that will be
8 receiving the information into the development of the resources
9 of that extension dissemination would be really helpful in
10 building trust and making sure that the right language is used
11 and that the information is relevant.

12 CHAIR BRUCH: Thanks, Franklin. Thank you, Amber.
13 Logan, quick question.

14 BD. MEM. PETREY: Yeah. I really like the idea of
15 the health benefits for the consumer, as far as for organics or
16 their pesticide residuals, what it's doing. Just curious, like
17 we have research priorities based on each subcommittee. Just
18 curious at where we would fit that in. I do like the idea of
19 just kind of -- would that be like a crops issue or --

20 MS. SCILIGO: Yeah, and we do highlight in our
21 detailed notes that doing health outcomes is maybe not even
22 USDA program area. It could be like the National Institute of
23 Health, but there are some -- it might fit into some of the
24 crop priorities. If we were to say, look at like records of
25 pesticide applications in areas, I know that California has a

1 really good record of the applications of sprays, of all inputs
2 actually. And that could be correlated with medical records
3 also in that area. So that could still fall into the purview
4 of USDA and maybe the crops -- the crop section as well.

5 CHAIR BRUCH: Great, thank you. Thanks,
6 Logan. Thank you, Amber, for your time and contributions.
7 Really appreciate it.

8 All right. We're going to be moving on to Gwendolyn
9 Wyard, followed by Jackie DeMinter and then Adam Seitz. Go
10 ahead, Gwendolyn, please state name and affiliation.

11 MS. WYARD: Okay, hello. I think there's some slides
12 for my three minutes. I'll get those up there before I get
13 started. Don't start that clock yet. All right. Okay, so you
14 can hear me okay? Testing, check, check. Wonderful. All
15 right.

16 Well then let's hit it. Good morning, NOSB chair,
17 NOP staff and everyone in the virtual gallery. My name is
18 Gwendolyn Wyard and I'm founding partner of Strengthening
19 Organic Systems. We're an advising firm dedicated to doing
20 just as our name states.

21 You heard from my colleagues, Johanna Phillips and
22 Kim Dietz on Tuesday. Today, I'm going to continue with
23 comments in strong support of passing the proposal on residue
24 testing for a global supply chain. We think process-based
25 certification is our foundation and should be always and

1 forever, but we also need a robust NOP testing program, one
2 that everyone knows about, one that uses the right testing, the
3 right way at the right time. Testing is critical because it's
4 a key tool for breaking what is known as the organic fraud
5 triangle. Next slide.

6 Introducing an organic fraud infographic hot off the
7 press and seen publicly here for the first time. This is a
8 handy tool that can be used to help an array of audiences
9 understand what organic fraud is, the costs, the benefits to
10 preventing it, and most important to our moment here, why does
11 it occur? What conditions must be present? And what do we
12 need to do to prevent it from happening?

13 Before I move to the next slide, take your screenshot
14 now if you haven't already, and you can put your name in the
15 chat and I will invoice you later. Okay, next slide.

16 Why does organic fraud occur? It's economically
17 motivated, right? So follow the money people. And according
18 to criminologist Donald Cressy, it happens when three
19 conditions are present and they collide. Those conditions are
20 opportunity, incentive or pressure, and rationalization. Next
21 slide.

22 Our job then is to think like a criminal and figure
23 out how to take away the opportunity, understand and address
24 the pressure, and remove rationalization. When we think about
25 certification, oversight, and enforcement, we have a lot going

1 on. Let's not forget that we are the most regulated eco-label
2 in the marketplace and the only one that is protected by law,
3 federally defined, third party inspected, and enforced by the
4 government, the NOP that we need and love. We are getting
5 better and stronger all the time. But there are key conditions
6 housed under opportunity and rationalization that need more
7 attention.

8 Now I could talk on this slide all day, so I've added
9 some bright red circles to direct focus. We need to prioritize
10 more testing at the right place and at the right time.
11 Criminals are less likely to engage in fraudulent activities
12 when they believe there is a high probability of being
13 caught. This is known and testing does this.

14 Two and three, robust penalties and penalty
15 awareness. If the penalty is not severe and/or the penalty is
16 unknown, then there's an opportunity, there's both opportunity
17 and rationalization for a fraudster. In closing, next slide
18 please.

19 SOS strongly supports the work of NOSB and NOP to
20 create a more robust and effective testing program. We need
21 increased testing to scare and catch the cheaters. We need
22 robust penalties to hold the cheaters accountable. And we need
23 to raise public awareness around the risks and penalties for
24 committing fraud. We believe continued time and attention on
25 these three factors will go a long way in protecting organic

1 integrity, upholding standards and maintaining consumer
2 trust. Thank you.

3 CHAIR BRUCH: Gwendolyn, thank you for your time
4 today and sharing your slides and your information. Any
5 questions for Gwendolyn? All right, Brian, go ahead.

6 BD. MEM. CALDWELL: Gwendolyn, thank you so much. I
7 really appreciate that you put all that together in one
8 package. It's great. How can we determine or monitor whether
9 approaches that are in force right now are being effective or
10 not?

11 MS. WYARD: Well, I think that gets to the question
12 of trying to understand how much fraud is out there and
13 whether, you know, how much is out there, whether it's
14 happening. And I think that when we look at a lot of the data
15 and according to, you know, what we're hearing, right, call it
16 anecdotal, but more than just what is anecdotal.

17 CHAIR BRUCH: Gwen, we lost you. Oops. Are you
18 there?

19 MS. WYARD: Am I not coming through?

20 CHAIR BRUCH: Oh, now you are. Yeah. Maybe just
21 rewind one sentence.

22 MS. WYARD: I'm having connection problems today, so
23 I apologize. I'm cutting in and out.

24 I think that we have to look at the reports of fraud
25 and everybody needs to be reporting fraud. And what I can say,

1 Brian, is as an organization that's committed to fraud
2 prevention, we're hearing enough to know that the actions that
3 are being taken are not enough. And that's not a very concrete
4 answer, but I think being able to understand what is working
5 and what is not working is a really, really important part of
6 the equation.

7 And so what we know is that testing is not happening
8 to the degree that it should be, and that is allowing for a
9 huge exploitation of the organic sector and use of fraud. So,
10 you know, we really have to continue to do research into
11 understanding how much fraud is occurring and what specific,
12 just as you said, what specific actions need to be put into
13 place. And so I cannot emphasize enough how important testing
14 is to the answer to your question.

15 BD. MEM. CALDWELL: Thank you so much. Loud and
16 clear.

17 CHAIR BRUCH: Thank you, Brian. Gwen, thank you so
18 much for your time today. I hope you -- and just a comment to
19 make sure your written comments are included. There's still
20 time to get those in if you haven't.

21 MS. WYARD: We're absolutely going to submit our
22 written comments and not over the weekend.

23 CHAIR BRUCH: Wonderful. Okay.

24 MS. WYARD: Thanks everyone.

25 CHAIR BRUCH: All right. Thank you. We have Jackie

1 DeMinter and then Adam Seitz, and then we'll be taking a break
2 here. Go ahead, Jackie, please state name and affiliation.

3 MS. DEMINTER: Good afternoon. Thank you for the
4 opportunity to comment. My name is Jackie DeMinter and I'm the
5 Certification Services Director at MOSA.

6 We certify over 1735 organic operations in the U.S.
7 I will touch on risk-based certification, focus on residue
8 testing, and close with the need for realistic expectations on
9 the administrative end.

10 Risk assessment. Our tools are working well, but we
11 generally support an ACA working group to further develop
12 resources to ensure certifier consistency. However, we do not
13 support additional prescriptive processes or measures for
14 certifiers and clients. Residue testing. The following are
15 the main goals we summarize from the documents and can agree
16 with. The best ways to implement these goals need further
17 discussion, however, and since the discussion document directly
18 impacts how the proposals revisions are to be applied, one
19 can't move forward without the other.

20 The goals are to: one, include residues other than
21 pesticides. We agree this would be helpful. Two, address the
22 issues of low-level detects and materials without a tolerance
23 level. Testing MOSA clients has not revealed fraud in any real
24 sense, and we'd like to see the unintended consequences of
25 negative impacts minimized on small farms when barely

1 quantifiable levels of residues clearly are not from prohibited
2 substance application. This should be addressed
3 now. Establish regulation and how it's applied in various
4 drift circumstances. NOP needs to clarify this immediately.
5 Clarify how UREC is applied in the regulation. We need to
6 understand how draft revisions impact our application.
7 Eliminate fraudulent and contaminated products from the
8 marketplace. Stop sale as it is may not be the best
9 solution. And six, reduce cost and burden to certifiers.

10 NOP should oversee residue testing for organic
11 products and relieve certifiers of the 5 percent burden,
12 requiring instead that we employ a residue testing program that
13 seeks to root out real fraud.

14 In closing, we emphasize again change fatigue. We
15 need time to effectively implement changes that create more
16 work. For example, generation certificates from the integrity
17 database significantly impacts efficiency, and the frustration
18 it causes our staff is unacceptable. Changes should also not
19 put clients at risk. Most of the clients were subject to a
20 phishing scam just yesterday because their personal information
21 must be published in OID.

22 Last, this timeline handicaps a good stakeholder
23 process. Verbal comments before letters are due, the day
24 before the meeting begins, after a weekend of regulations.gov
25 portal being down. Very unfortunate. As such, impactful

1 proposals should be planned for further discussion and voting
2 at the next meeting. We appreciate you, NOSB, for all of your
3 hard work.

4 CHAIR BRUCH: Jackie, thank you so much. You packed
5 a lot in those three minutes. Do we have questions for Jackie
6 here from the Board? Yes, go ahead, Kathryn.

7 BD. MEM. DESCHENES: Jackie, I heard you say
8 something about USDA funding versus the 5 percent residue
9 testing. Tell me more about that.

10 MS. DEMINTER: What I said was that we would love to
11 see NOP oversee a residue testing program off the, right, it
12 says that the administrators, certifiers, and state programs
13 should oversee the testing program, so NOP perhaps could
14 oversee the program and relieve us of that 5 percent burden of
15 our clients needing to be tested. Not that we wouldn't do
16 residue testing, but that we wouldn't be mandated to do an
17 arbitrary 5 percent of our clients in random sampling.

18 BD. MEM. DESCHENES: Very good, thank you.

19 CHAIR BRUCH: Thanks, Kathryn. Any other questions
20 for Jackie? I'm not seeing any. Thank you again. We have
21 Adam Seitz next, and then we're going to be taking a break.

22 MR. SEITZ: All right. Good afternoon. My name is
23 Adam Seitz, and I serve as a senior technical reviewer and
24 policy specialist for Quality Assurance International, an NSF
25 company, and a leading provider of organic certification

1 services worldwide.

2 Thank you, NOSB and NOP for your efforts and for the
3 opportunity to comment. NSF and QAI would first like to
4 recognize the essential function that all NOP and USDA staff
5 and civil servants play in protecting organic integrity,
6 legitimizing the USDA organic seal, and implementing other
7 essential USDA programs. We greatly value your role.

8 Cornstarch. QAI has 118 operations using organic
9 cornstarch and 12 using non-organic. A primary use of the non-
10 organic form is as a molding starch processing aid for organic
11 gummy production. Some of these operations also use organic
12 cornstarch, but as an ingredient. Some additional operations
13 list non-organic cornstarch in their OSB, but are using organic
14 cornstarch. It seems there was at least one organic cornstarch
15 shortage in recent years, so they maintain non-organic
16 cornstarch as a backup.

17 In addition to the above, we have 18 operations that
18 use non-organic baking powder and none using organic baking
19 powder. Baking powder is usually formulated with cornstarch,
20 and the cornstarch serves an ancillary function. It is
21 disclosed as an ingredient and needs to be reviewed as such.

22 Glycerin. Not counting glycerin use in non-organic
23 natural flavors, which doesn't rely on its 606 listing, 88 QAI
24 operations use organic glycerin. In 2020, 34 QAI operations
25 use non-organic glycerin, but today only 11 use non-organic

1 glycerin.

2 Sodium bicarb. Due to the historic understanding
3 that sodium bicarb was misclassified, it is an ACA best
4 practice to verify it is produced via the Trona process and not
5 the Solvay process to be permitted in organic handling. See
6 QAI Spring 2024 written comment for the full ACA best practice.

7 QAI sodium bicarb verification entails ensuring it is
8 mined or produced via the Trona process and not the Solvay
9 process. The fact that the Trona process may result in a
10 synthetic classification by today's standards is not new
11 information. This was the process and permitted form detailed
12 in the original 1995 TAP reviews.

13 While it would have been amazing if uniformly
14 implemented since the inception of 605 and 606, there is no
15 dogma when it comes to classification. So of course there is
16 room for continuous improvement. There are several examples,
17 but pectin is my go-to.

18 Prior to 2012, one form was listed as synthetic,
19 another as agricultural. Both forms were unified into a single
20 listing at 606 as agricultural, but if run through the most
21 recent guidance on classification, pectin would likely be
22 considered synthetic since both high and low methoxypectin are
23 produced via acid demethylation and hydrolysis. So it's
24 currently listed at 606 as agricultural, though it is literally
25 cited as an example of a non-agricultural substance at 205.2

1 terms defined.

2 I bring this pectin example up to make the point that
3 when certifiers determined which forms of a substance are
4 permitted and which are not, we use the historic context of
5 TAPP reviews, TERS, NOSB meetings and recommendations, proposed
6 rules, final rules, NOP guidance, and on and on, because the
7 regulatory text is not crystal clear. Thank you much for your
8 work and the opportunity to comment.

9 CHAIR BRUCH: Okay. Thanks, Adam. I really
10 appreciate your comments. Go ahead, Carolyn. I see your hand.

11 BD. MEM. DIMITRI: Thanks so much, Adam. Can you
12 tell me, functionally, is there any difference between organic
13 and non-organic corn starch?

14 MR. SEITZ: Yeah, not being the food scientists in
15 the labs figuring out which corn starch to use, I can't speak
16 to that. I can't speak to just the uses that we have. And I
17 would note, we did have other uses beyond molding starch of
18 non-organic corn starch. Such few of those operations, though,
19 that it kind of, straight on the line of potentially disclosing
20 confidential information, but I will encourage those operations
21 to hopefully participate in the discussion between now and the
22 fall meeting on corn starch.

23 BD. MEM. DIMITRI: Great, that would be really
24 helpful. Thank you.

25 CHAIR BRUCH: Thanks, Carolyn. Kyla, question?

1 BD. MEM. SMITH: Yes, I think so. I need to go back
2 and look at the historical materials again because I did so
3 when writing the sodium bicarb thing, which, again, was a lot
4 more complicated with the new information in the TR than we
5 originally had thought baking soda was going to be. And I feel
6 as though when I was reviewing the historical information that
7 -- so I wanted -- but then I feel like maybe I heard you say
8 something different, so this is where my question is. In
9 regards to the Trona process, I will double check, but I felt
10 like in the historical record that was couched as a non-
11 synthetic, whereas in the most recent TR, the fact that the
12 Trona ore is then processed via that calcination heating
13 process then resulted in a synthetic process.

14 So was that new for y'all or were you all, or was I
15 missing something in the historical record and was that always
16 known and it's just been sort of allowed? So can you talk a
17 little bit about that?

18 MR. SEITZ: Yeah, I mean, the TAPP reviews are not
19 entirely clear, but they do go into the fact -- they do go into
20 the full production process via the Trona process, those steps
21 that would render it synthetic, again, based on what we
22 consider synthetic today, but it's kind of been a moving target
23 over the many years.

24 So it's actually kind of unclear whether they
25 determined that to be non-synthetic or non-synthetic in my

1 opinion, because some TAPP members qualified it as synthetic,
2 some non-synthetic and, you know, hard to piece together those
3 notes. Regardless, I think it was added as non-synthetic and
4 it's at least was the ACA Materials Working Group's
5 understanding at the time that that best practice that I
6 referenced was established, that the Trona -- sodium bicarb
7 produced via the Trona process was intended to be covered with
8 the national list inclusion of sodium bicarb.

9 BD. MEM. SMITH: Okay. Sorry, and now we know that
10 maybe that is actually not really accurate. And so --

11 MR. SEITZ: That it's non-synthetic versus synthetic.

12 BD. MEM. SMITH: Correct.

13 CHAIR BRUCH: Sorry. I'm just going to jump in
14 here. Any other questions, Kyla?

15 BD. MEM. SMITH: So based on that determination, is
16 it correct that there are likely -- the synthetic version is
17 likely being used by what we know today?

18 MR. SEITZ: I assume yes. I mean, that's been
19 certifiers verification practices for a long time.

20 CHAIR BRUCH: All right, thank you, Kyla. Thanks,
21 Adam, for that exchange there. Any other questions for Adam?

22 All right, that brings us up to a break. Yeah, I
23 really appreciate your information there, Adam. That brings us
24 up to a break. We are going to return back at five till the
25 hour, so 55 after. We're going to continue our cadence

1 here. So we'll see you again shortly, and we will have Mike
2 Dill up when we return, followed by Ben Jackle, and then Jaydee
3 Hanson. See you shortly.

4 (Recessed at 1:48 p.m.; to reconvene at 1:55 p.m.)

5 CHAIR BRUCH: All right, welcome back,
6 everybody. We're ready to kick off our second segment here
7 today. And I just wanted to remind everybody, we are trying to
8 manage a tight schedule, so I apologize in advance for any
9 interruptions due to time management. We're going to start off
10 with Mike Dill, followed by Ben Jackle, and then Jaydee
11 Hanson.

12 Mike, why don't you kick us off? Name and
13 affiliation, please.

14 MR. DILL: All right, good morning, good afternoon,
15 NOSB members. My name is Mike Dill, and I'm representing the
16 Organic Produce Wholesalers Coalition, which is comprised of
17 seven certified organic businesses that distribute fresh
18 organic produce to eaters across the country. On behalf of the
19 OPWC, I would like to welcome the five new Board members and
20 share our appreciation for all the members who are volunteering
21 their time and committing to five years of service. Thank
22 you.

23 That said, as we have mentioned before, OPWC would
24 like to see all 15 seats of the Board represented at each
25 meeting, and we assert that the repeated absence of one of the

1 Board's members be addressed through voluntary resignation or
2 replacement.

3 With regard to compost, I'd like to emphasize two
4 points from our written comments. We urge the Board to be
5 cautious when basing its argument in response to BPI's petition
6 on the Crop Subcommittee's assertion that a biological process
7 cannot convert a synthetic material to a non-synthetic
8 material. Please consider the potential for unintended
9 consequences when this statement is applied to other materials,
10 as we describe in our written comment.

11 OPWC would also like the Board to consider consulting
12 with the Compost Manufacturing Alliance, or CMA, regarding this
13 organization's processes for reviewing and field-testing
14 compost feedstocks. OPWC did not have as much time as we had
15 hoped for during this comment period to review the basis for
16 ASTM's standards, but what we did find is that ASTM's feedstock
17 testing is conducted in a laboratory setting. We advocate for
18 field testing over lab testing because we think field testing
19 will provide a better approximation of how a feedstock will
20 actually play out in an organic system.

21 As we note in our comments on the methodology of the
22 ASTM lab test, there are many differences between the
23 controlled conditions in the lab and the conditions under which
24 compost is made on-farm or by commercial composters. As a
25 result, OPWC suggests that ASTM may not be the most appropriate

1 standard to use as a basis for NOSB's evaluation of
2 feedstocks.

3 Additionally, we recognize the added pressure for
4 NOSB to make recommendations on compost feedstocks while
5 California's compostable labeling bill is in play. And one
6 final but important point on compost, we ask that when crafting
7 recommendations on compost, the Board be mindful of compliance
8 issues that new rules would propose for farmers who produce
9 their own compost, as well as the risks, liabilities, and
10 practical limitations that would impact -- that would impact
11 commercial composter.

12 Finally, on the topic of risk-based certification,
13 OPWC would like to reemphasize our concern about using ACA best
14 practices and other non-mandatory procedures as a basis for
15 NOP's regulation of the organic trade. We greatly appreciate
16 ACA's important role in the organic community and are grateful
17 for the information NOP provides through the Organic Integrity
18 Learning Center, but we assert that all elements of risk-based
19 certification need to both be legally enforceable and in line
20 with terms of other international equivalency
21 agreements. Thank you.

22 CHAIR BRUCH: Thank you. Mike, thank you for your
23 comments today. Any questions for Mike?

24 Kyla, yes, I see your hand. Go ahead.

25 BD. MEM. SMITH: Sorry, I can't get to my thing. I

1 have a hurt wrist and it's affecting my computer skills.

2 Couldn't get to my button fast enough.

3 Anyway, just for the record, and I did read your
4 all's written comments, but just to be like uber clear, you,
5 OPWC, would like to see the risk criteria that are currently up
6 to the certifier's determination and are currently in an ACA
7 scorecard, like best practice document, specked out in the
8 regulations in an ideal world. Is that what you're saying?

9 MR. DILL: Yes. Yep. And we appreciate the
10 scorecard. We think it's great. We appreciate everything
11 that's happening. We just worry about how this can work with
12 other international standards. And if, you know, folks, if the
13 EU would recognize our risk-based control system, we just feel
14 that we have to, you know, be in line with ISO requirements and
15 we just can't jeopardize, you know, the accreditation of the
16 NOP during this process. We have to make sure that it's
17 aligned and it's enforceable for it to hold up.

18 BD. MEM. SMITH: Thank you.

19 CHAIR BRUCH: Thanks, Kyla. Any other questions for
20 Mike? All right.

21 Really appreciate your macro perspective here and all
22 the written comments that you also submitted. Mike, thank you.

23 MR. DILL: All right, thank you.

24 CHAIR BRUCH: All right. We have Ben Jackle,
25 followed by Jaydee Hanson and then Adrienne Shelton. Go ahead,

1 Ben. Please state your name and affiliation.

2 MR. JACKLE: Thank you. Hello, my name is Ben
3 Jackle and I'm representing the materials review team at MOSA
4 Certified Organic.

5 First, a quick thank you to the NOSB members and NOP
6 staff for your ongoing work, especially in the face of much
7 uncertainty. I will be making quick comments on livestock,
8 crops, and handling subcommittee proposals.

9 MOSA supports the updated iodine annotation. As
10 mentioned in our previous comments, health inputs containing
11 iodine are in use by hundreds of livestock operations that we
12 certify. If adopted, this annotation will allow the vast
13 majority of these iodine-based products to remain available for
14 use by our clients, while aligning with those in the industry
15 who already prohibit NPE residues in organic products.

16 Based on discussion earlier in the week, I wanted to
17 confirm that we have not seen products that previously
18 contained NPEs reformulated with a different alkyl phenol
19 ethoxylate or APE.

20 With that, I will move to the crop subcommittees
21 compost discussion document and proposal. While we are
22 awaiting the technical report in order to better understand
23 compostable polymers, we are also concerned with the question
24 of whether current regulations provide sufficient guidance to
25 ensure that compostable polymers will be broken down through an

1 organic compliant composting process. Specifically, the
2 regulations and NOP guidance documents describe how manure must
3 be processed such that it may be applied without a pre-harvest
4 restriction. Therefore, the composting requirements currently
5 in the standards determine when manure may be considered
6 sufficiently composted.

7 We ask the NOSB to consider if these standards are
8 also sufficient to completely break down compostable polymers
9 in the context of the discussion regarding whether to recommend
10 compostable polymers for addition to the national list. This
11 question comes specifically from feedback that we received from
12 a composting operation that produces both NOP compliant compost
13 and compost that contains post-consumer compostable surface
14 wear. Notably, this operation did not consider the time and
15 temperature standards at 203 to be sufficient to degrade
16 compostable polymers that they have seen.

17 Next, with regard to the handling subcommittee
18 proposals, we would like to offer the following
19 comments. While potato growers who we contacted regarding
20 ethylene use did not have direct experience with or necessarily
21 an intention to use this material, they did cite shortcomings
22 with the inputs currently available to organic growers for
23 sprout inhibition. Finally, while we do not have any issue
24 with the reclassification of L-malic acid as a synthetic, we do
25 not generally support the use of commercial availability

1 restrictions to drive the use of non-synthetic forms of
2 materials on the national list. Thank you for the opportunity
3 to make these comments.

4 CHAIR BRUCH: Ben, thank you so much for your time
5 today. Sorry for mispronouncing your last name. I really
6 apologize.

7 I see a question from Allison. Go ahead, Allison.

8 VICE CHAIR JOHNSON: Thanks for your comments, Ben.

9 On the last point, the not supporting commercial
10 availability requirements or distinguishing between synthetic
11 and non-synthetic, can you say a little bit more about why?

12 MR. JACKLE: Sure. Basically, the most common way to
13 assess commercial availability is to have operations look for a
14 handful, three sources usually, of these things. In the case
15 of certified organic seed or certified organic agricultural
16 ingredients, 606 materials, that certified organic status is
17 readily ascertainable through a catalog listing or other sort
18 of document like that.

19 The non-synthetic status of a material, sometimes
20 that can only be determined by a material review or sort of
21 proprietary information that you might receive from a
22 manufacturer. So I guess the question is just is that going to
23 mean that we're going to have to review a handful of more
24 materials that clients have no intention of actually using in
25 order to satisfy some sort of commercial availability

1 requirement?

2 CHAIR BRUCH: 1Helpful, thank you. Thanks,
3 Ben. Thanks for the question, Allison. Go ahead, Nate.

4 SECRETARY LEWIS: Let me just try to make sure I got
5 your comment accurately. So forgive the need to restate
6 this. On the iodine, particularly the teet dips, you said you
7 have only seen formulations with NPEs, nonylphenol ethoxylates,
8 as the saponifier. You have not seen octylphenol ethoxylates
9 or some of these other less common ones. Is that -- am I
10 getting it right?

11 MR. JACKLE: Yes, that is correct. And I would just,
12 and we made this stipulation in our written comments the last
13 time. We refer to the ACA best practice document, which
14 assumes that these complexing agents are part of the standard
15 of identity of iodine. So there are instances where we maybe
16 have not gotten complete disclosure of those complexing agents.
17 But we often do. And in all of the information that I have
18 reviewed, we haven't seen any, like I said, any times where
19 those APes have been substituted for NPEs.

20 SECRETARY LEWIS: Got it. Thank you so much. That's
21 really helpful.

22 CHAIR BRUCH: Thank you, Nate. Kyla, I see your
23 hand, go ahead.

24 BD. MEM. SMITH: Yeah, also on this point, again, I
25 think what I was hearing as well, so just clarifying this too,

1 is that because there are some industry groups that prohibit
2 NPE teet dips or what have you, as a material review
3 organization, you're sort of flagging, or as a certifier that
4 does material review, you're like flagging those. And if it is
5 notated as like this contains NPEs or it's not designated as an
6 NPE-free, the manufacturer isn't trying to like loop around and
7 put in an APE or a different thing that is not an NPE to sort
8 of circumvent that distinction. Am I understanding that to be
9 correct as well?

10 MR. JACKLE: To the best of our knowledge. Yeah,
11 with the caveat just presented. But yeah, to the best of our
12 knowledge, we have not seen that in the information that we
13 have reviewed.

14 CHAIR BRUCH: All right, thank you, Kyla. Thank you,
15 Ben, for your time today. We will be moving on to the next
16 speaker. We have Jaydee Hanson currently, and then Adrienne
17 Shelton, followed by Anne Stoner.

18 Go ahead, Jaydee, please state your name and
19 affiliation.

20 MR. HANSON: I'm Jaydee Hanson. I'm the Policy
21 Director at the Center for Food Safety. And thank you all for
22 spending hours and hours on your work as NOSB members.

23 We have submitted written comments already. I am not
24 going to cover the ones on compost purity or expanded
25 research. And my colleague, Amy Vinson, was going to cover

1 inerts, but she has a family emergency and won't be able to.
2 So I will be talking about excluded methods.

3 The issue of excluded methods regularly comes up in
4 the handling materials part of the national list, and we are
5 highlighting that some of the new ways of making food are using
6 new and different kinds of genetic engineering, in particular
7 the new so-called cell-based meats.

8 The FDA has now approved three cell-based meat
9 products, two poultry and one pork, using a weak variant of
10 their generally regarded as safe process. Right now, consumers
11 can't even know that these are genetically engineered products
12 in some cases because the Office of Management and Budget is
13 still working on approving the labeling from the USDA.

14 There are other kinds of fermentation that can also
15 end up as excluded methods. One of the leading synthetic
16 biologists, Jeff Volk, spoke with me a few years back and we
17 were talking about whether he was being asked by winemakers to
18 consult on their yeast. He said he was, but that at that time,
19 no winemakers were asking him to engineer a new yeast and he's
20 mostly helping them understand the genetics of the yeast.

21 But this is a fast moving field and we must continue
22 to be specific that organic certification does not allow the
23 use of excluded methods anywhere in the production of the
24 food. We need to be clear that excluded methods are not
25 allowed in fermentation, whether in the substrate or in the

1 organisms. And we need to look back as far as possible.

2 We now need to assume that any new kind of food or
3 drink might have used a novel kind of genetic engineering in
4 the product. So we need to be aware that terms such as
5 precision fermentation and synthetic biology may be code for
6 genetic engineering. Expanding use of excluded methods will
7 continue to create challenges for certifiers, material review
8 organizations, and growers and handlers, recognizing when
9 they're being used and how they can be avoided.

10 CHAIR BRUCH: All right, Jaydee, thank you for your
11 time. Give our best to Amy on behalf of the community.

12 Are there any questions for Jaydee? I'm not seeing
13 anything, Jaydee, so thanks again. We'll look forward to
14 reading your written comments as well.

15 MR. HANSON: And thank you for all your work. You've
16 got a lot to read. And I was going to say that we support all
17 of the submissions of the National Organic Coalition and we've
18 been on the review committee for their submission. So thank
19 you, read well. Wish we were seeing you in person.

20 CHAIR BRUCH: All right, thanks again, Jaydee.

21 We have Adrienne Shelton followed by Anne Stoner and
22 then Bryce Irlbeck. Do we have Adrienne? All right, please
23 state your name and affiliation.

24 MS. SHELTON: Thanks, Amy. My name is Adrienne
25 Shelton and I'm the R&D manager for organics at Enzazaden and

1 Vitalis Organic Seeds. I also serve as co-chair of the OTA
2 Seed Task Force.

3 Thank you for the opportunity to speak today about
4 organic seed and for your many hours of hard work as Board
5 members. Please refer to our written comments regarding the
6 fundamental challenge of seed equivalency. Today, I will speak
7 more broadly about the three key stakeholders that need to be
8 actively engaged in this conversation.

9 I like to think of this as a three-legged stool with
10 the seed industry, certifiers, and growers, each as critical
11 legs of the stool. While we are making some progress in
12 achieving balanced legs, we still have more work to do.

13 Regarding the seed industry, there are some companies
14 such as ours that are actively producing high quality organic
15 seed, but this is certainly not enough. However, we know from
16 examples in the EU that more companies will participate if the
17 market signals are there.

18 Regarding certifiers, there's general consensus that
19 we need improved organic seed regulations that are clear, risk-
20 based and easier to inspect. Regarding growers, the range of
21 opinions is more diverse as growers are worried what a change
22 in the status quo might mean for their livelihoods. Some of
23 the key concerns that I have heard are as follows.

24 There simply is not sufficient organic seed in
25 quantity and quality to meet the needs of organic growers. In

1 our current situation, this is true. But supply follows
2 demand, and if the demand is not there, which it currently is
3 not, the supply will never materialize on its own. Organic
4 seed is more expensive. This is also true. Just as it costs
5 more to produce an organic tomato compared to a conventional
6 one, organic seed is more costly to produce. But seed
7 production benefits from economies of scale and higher demand
8 will allow for more competitive organic seed pricing in most
9 crops.

10 And the biggest concern that I hear has to do with
11 variety equivalency. Growers are dependent on some varieties
12 that are only available in conventional form and for which
13 there are no suitable alternatives organically. And this is
14 also true. It is the nature of variety development and
15 stipulated in our federal seed laws. This is why we need to
16 support creative new models with active engagement from all
17 three stakeholders. We need models that can discriminate
18 between crop segments where requiring stronger organic seed use
19 is practical and achievable, recognizing that for other crop
20 segments, organic seed use is currently not and may never be
21 feasible.

22 Perhaps we even consider requiring a percentage of
23 organic seed use depending on the crop segment. For example,
24 perhaps 40 percent of a grower's cherry tomato acreage must be
25 planted to organic seed, while for cabbage or soybean, the

1 percentage might be different. Developing regional crop
2 specific expert groups could enable such a model. Only by
3 working together can we arrive at solutions that work for all
4 three stakeholders with the ultimate goal of ensuring the
5 integrity of the organic label.

6 CHAIR BRUCH: Excellent. Thank you,
7 Adrienne. Really appreciate your comments here. We've got a
8 question from Logan followed by Carolyn.

9 BD. MEM. PETREY: Hi, Adrienne. Thank you. Okay, so
10 you mentioned the quantity not being there and I think that's
11 kind of generally understood. It's the quality that really has
12 come up for me. I am a grower. I realize that there are seed
13 borne diseases as well and as a vegetable grower, it's
14 important for all commodities, but when you're trying to
15 actually sell the leaves of commodities, it can be -- the
16 expectation needs to be very high as far as the quality there.
17 So can you kind of briefly go on like why organic seed might
18 have lesser quality and what that can result in for a farmer?

19 MS. SHELTON: Well, yeah, certainly there's no
20 question that there are challenges with organic seed production
21 that we don't have in conventional seed production.
22 Nonetheless, I can only speak from our experiences. Our
23 company, we hold our organic seed lots the same standards that
24 we hold our conventional seed lots. So for example, if we're
25 talking about disease testing, we test all of our lots of seed

1 for the same diseases and we have the same thresholds for
2 allowance. Same with if we're talking about any sort of purity
3 issues and germination issues. There's minimum germination
4 standards that are set by the federal seed laws. And then of
5 course we also indicate what the germination is on a seed
6 lot. And I would say that often it's not -- the difference is
7 not whether it's a conventional or an organic production, it's
8 dependent on that particular lot, where that lot was produced,
9 what the conditions were in that geographic location at that
10 time of year. So there's a lot of different issues that -- or
11 factors that go into making sort of high quality seed.

12 And so again, I can only speak for what we do, which
13 is that we don't have different allowances, right, different
14 standards, exactly.

15 CHAIR BRUCH: Thanks for the question, Logan.

16 BD. MEM. PETREY: I'm sorry. So when you have -- it
17 may cost more to grow the seed, but you also may have less
18 recovery just due to potential disease getting worse.

19 When I'm like -- with organics, I see that disease
20 gets worse with time, that's epidemiology, gets worse with
21 time. And so when you're taking that crop fully to seed, like
22 that is the length of the entire crop where we're terminating
23 something early because it's leafy, for example, but that
24 disease may build up. And then so the recovery of the seed or
25 the yield, I guess, would be less as well, which may make that

1 price point greater as well. But thank you, thank you.

2 CHAIR BRUCH: All right, Carolyn, go ahead.

3 BD. MEM. DIMITRI: Hi, Adrienne. Can you tell me
4 about -- I was curious about the EU where you said there was a
5 greater dissemination of organic seeds in the EU. And I just
6 wondered, are the suppliers of the organic seeds, like the big
7 seed companies, the concentrated four, or have there been
8 enough market incentives for them to jump into organic or do
9 they have like a more diverse seed supply landscape?

10 MS. SHELTON: Well, I would say that in the EU, we
11 see some of the main providers of -- well, and I'll speak to
12 vegetable seed because that's the world that I know. We'll see
13 some of the leading vegetable suppliers of vegetable seed are
14 producing organic seed for EU markets that they're not doing
15 and not making available for U.S. markets.

16 So we do see more engagement from leading companies,
17 I would say, in the EU compared to what we see in the U.S. And
18 I think that really has to do with the fact that there are
19 tighter restrictions around organic seed use in certain
20 countries in the EU.

21 BD. MEM. DIMITRI: Thank you. That's fascinating.

22 CHAIR BRUCH: Thanks, Adrienne. Really appreciate
23 your time today. We're going to keep moving here. We have
24 Anne Stoner followed by Bryce Irlbeck and then Dale
25 Broekmeier. Anne, go ahead. Please state your name and

1 affiliation.

2 MS. ARSENAULT: Amy, we are not seeing Anne on the
3 line with us. And I'm just going to double check. Also, I
4 don't believe Bryce is with us. Oh, Bryce is on. All right,
5 so Anne is not on, but Bryce is.

6 CHAIR BRUCH: Thank you so much, Michelle. All
7 right, you're up, Bryce, and then Dale, and then Emily
8 Musgrave. Go ahead, Bryce. Please state your name and
9 affiliation.

10 MR. IRLBECK: Hi, Bryce Irlbeck, organic producer.

11 So as I mentioned before, my name is Bryce
12 Irlbeck. I'm a certified producer in Nebraska and Iowa. I
13 grow corn, soybeans, alfalfa, and a few other crops, as well as
14 tied to an alfalfa processing plant for pellets and certain
15 things like that.

16 Today, I'd like to focus my comments on the organic
17 integrity, the risk-based certification, and how there are
18 solutions to these problems that we're currently facing in the
19 industry. And I've been certified since 2015. In that time,
20 I've seen organic markets be a blessing to the farmers in our
21 area to provide healthy soil, healthy foods, and families. And
22 I've also just read a recent survey that showed organic sales
23 have crossed 70 billion, and now 30 percent of the farmland in
24 the U.S.

25 The reason that organic is fast-growing like that, I

1 believe, is in the past, we've had a trusted source of good
2 food. I'm afraid that trust is being broken, and it's hurting
3 the American farmer. And I have been heartened to see the bill
4 from Senator Ricketts and Senator Smith that's sponsored the
5 OIVA bill -- that OIVA bill. There are many certifiers that
6 have signed on and given their full support to the Organic
7 Integrity Verification Act. We have talked about this issue
8 for the past three years and the fraudulent grain targeting the
9 American organic market.

10 And this month, we have landed a solution with the
11 introduction of this bill. And we now need all certifiers and
12 farmers to join forces to pass this bill and make sure it
13 becomes enacted.

14 A concern that we farmers have heard from some of the
15 certifiers is their capacity to be able to initiate this bill,
16 capacity to do the job that they're mandated to do through
17 their accreditation. And I would say that we have an excellent
18 opportunity to support the International Organic Inspectors
19 Association, which is a good program in the world, but we need
20 all certifiers to be actively on board in supporting the bill
21 and then supporting the implementation of that.

22 Last point I'd like to highlight, and one of the last
23 points I'd like to highlight is the developing of testing
24 limits from the NOP. This hits home and I'll go through it a
25 little bit, but we are not currently testing foreign supplies

1 coming in, but we are aimlessly testing producers in the U.S.
2 And currently, me being one of them, we are experiencing
3 residue tests that are extremely low and a scientific base that
4 is based off of EPA ruling in the 1990s. And we are getting
5 positive residue tests at a very low level. We've worked with
6 our certifiers to try to correct that, figure out where it's
7 coming from, but it's an ambient out of the air and it's not
8 just farmers in Nebraska, it's hundreds of farmers across the
9 nation. And for the last six months, I've tried to contact the
10 NOP with no response. And I'm not sure anybody has been there
11 the last four years because we haven't been able to get ahold
12 of them, but this is causing a real issue in the farming world
13 and causing hundreds of thousands of dollars of damage to us,
14 our reputation and our product and many others in the area.

15 So I think just bringing this to the forefront and
16 getting testing in a way that benefits farmers and the
17 consumer.

18 CHAIR BRUCH: Thank you, Bryce, for your time
19 today. I see a hand from Kathryn. Go ahead, Kathryn.

20 BD. MEM. DESCHENES: I'm just curious, the testing
21 burden, like who is requiring the test? Who's asking for the
22 test?

23 MR. IRLBECK: For in the United States, Kathryn?

24 BD. MEM. DESCHENES: Yep.

25 MR. IRLBECK: Yeah, so the test is coming from the

1 certifiers, which we're happy to give the test. They came out
2 and give the test. We have a bin full of pellets that has 30
3 different producers in them. And we track it down and we test
4 the pellets. They have a lower level than what's allowed in
5 human food in the pellets, and we track it all the way down to
6 the producers and 15 out of the 18 producers, we found it in
7 the bale at those low levels. We can't do anything about it.

8 BD. MEM. DESCHENES: Yeah, I ask because like as a
9 handler, we are sometimes asking our ingredient producers to
10 test and sometimes things come up and we figure out the source,
11 but sometimes we don't. Anyway, I was just wondering where
12 that burden was coming from. Thank you.

13 CHAIR BRUCH: Thank you, Kathryn, for the
14 question. I see a hand from Brian. Go ahead.

15 BD. MEM. CALDWELL: Yeah, thanks, Bryce. I'm just --
16 I think it would take too long here, but if you could put into
17 the written comments your experience, it sounds like maybe
18 you've had loads or fields decertified because of these residue
19 levels and specify like what the chemicals were that were
20 found. I think that would help us a lot.

21 MR. IRLBECK: Yes, I can. And I want to be
22 clear. The certifier is actually very good on this part of it.
23 They worked with us. We developed a plan and our plan came
24 back. Hey, this is in the air. There's nothing we can do
25 about it. NOP said, great, don't sell it. Don't be organic

1 anymore. That was the response.

2 BD. MEM. CALDWELL: Yeah, so yeah, in the written
3 comments, if you could just put some in about that specific,
4 that would be really helpful. So thanks very much.

5 MR. IRLBECK: Yes, I can.

6 CHAIR BRUCH: All right, any other questions for
7 Bryce? I really appreciate your time. Yeah, and written
8 comments, I think to expand upon what you said would be
9 incredibly beneficial. So I point to that. Thank you.

10 We're going to move on to Dale Broekmeier, then Emily
11 Musgrave and Mike Menes. Go ahead, Dale. I apologize if I
12 mispronounce your name. I'm going to try to be more proactive
13 in my apology on that.

14 MR. BROEKMEIER: No, you're fine. Thank you very
15 much for having me. My name is Dale Broekmeier. It's a hard
16 name to spell and to say. I don't have a lot to talk about. I
17 work for Central Valley Ag. It's a private cooperative out of
18 Central Nebraska. We're headquartered in York, Nebraska. My
19 title is Director of Value-Added Grain.

20 We handle large volumes of actually lots of different
21 food grade things. We handle GM, we handle non-GM products,
22 and we handle organics. We're a certified organic handler at
23 Monroe, Nebraska on the UP Railroad and at Hordville, Nebraska
24 on the UP Railroad.

25 And my biggest challenge and my biggest question I

1 had today is, where we run into a hard time competing is with
2 imports coming into California. A lot of the stuff that we do
3 business with is on the West Coast and these imports come
4 in. And my biggest concern, I don't know what their
5 requirements are, but I always hear that people are like, they
6 question the fact that if the integrity of these imports are
7 what the integrity that we have here in Nebraska and our
8 certification agencies.

9 So my biggest thing is I'm all about testing. If
10 there is such a test, I'm all about holding those imports as
11 accountable as we are so we're on a level playing field. I
12 fully understand in my business, the market is the market. If
13 theirs is cheaper, they're going to get the business. If
14 mine's cheaper, I can, if quality's all the same. But if they
15 have an easier way to get their certification done and still
16 getting paid for organics, I think it doesn't put us in a level
17 playing field. And that's what concerns me, I guess. So
18 that's really my biggest point that I have.

19 If there are any questions, I fit in well right after
20 Bryce's comments, I feel. But that's really the only thing I
21 had in my mind today. I appreciate the time.

22 CHAIR BRUCH: Dale, thank you for participating in
23 our process. Are there any questions for Dale?

24 Dale, just a quick question for you. At your
25 facility, what's the percentage of testing on the trucks that

1 come in are currently being done? Is it 50 percent, 100
2 percent? Or where are you at on when folks are trying to
3 unload at your facilities if they're organic or non-GMO?

4 MR. BROEKMEIER: As far as just the GMO purity test,
5 or is that what you're asking for?

6 CHAIR BRUCH: Just what are you testing, and then you
7 can comment on what you're testing, if you want.

8 MR. BROEKMEIER: I would say probably 25, 30 percent
9 of the tests we're doing all the mycotoxins, the aflatoxins and
10 luminacins. But on, I'd say probably 60 percent of our loads,
11 we're testing for non-GMO purity. And requiring that, and if
12 we have anything that shows up at all over 99.1, that's less
13 pure than that, and then we don't dump that, and our customers
14 won't allow us to ship it to them. And on the people we're
15 doing, we're doing a lot of food grade business, so it's always
16 more food grade related that way, and some feed.

17 CHAIR BRUCH: Okay, excellent, Dale, thank you. I see
18 a question from Carolyn, go ahead.

19 BD. MEM. DIMITRI: Thanks. Hey Dale, thanks so much
20 for being here today. I'm curious about your perspective on
21 the competition with these imports that come in from
22 California. I mean, do you think that this is becoming --
23 like, is it getting better? Is it getting worse? Or is that
24 threat just about the same amount?

25 MR. BROEKMEIER: We're kind of new to the business,

1 so I don't know if I'm smart enough to even reply, other than
2 the fact that when we don't have any markets, or competitive
3 markets for our farmers, the biggest thing I hear is, well,
4 imports are working into the marketplace. And then I always
5 hear that, well, they'd rather buy U.S. organic certification
6 grain, but if it gets too far out of line, they will buy the
7 imports. So that always tells me that I feel like something's
8 easier on the import side, because the people that are buying
9 our grain would rather have it be U.S. approved organics, but
10 if the price gets too far out of line, they'll go the other
11 way. That's really the only knowledge I have today, to even
12 speak on it, but thank you for the question.

13 BD. MEM. DIMITRI: Great, thank you, Dale.

14 CHAIR BRUCH: Dale, thanks so much for your time,
15 really appreciate it.

16 MR. BROEKMEIER: Thank you.

17 CHAIR BRUCH: Yep, we're going to keep moving onto
18 Emily Musgrave, then Mike Menes, followed by Fiona Buckley. Go
19 ahead, Emily, please state your name and affiliation.

20 MS. MUSGRAVE: All right, good afternoon. My name is
21 Emily Musgrave, and I'm the Organic Regulatory Manager at
22 Driscoll's, and the Chair of the Organic Committee at the
23 International Fresh Produce Association, IFPA. Driscoll's is a
24 family-owned operation that has been producing organic berries
25 for over 25 years, and we're looking forward to continued work

1 with NOSB on organic standards and sunset reviews. I would
2 like to give a big thank you to all the Board members for your
3 hard work in upholding the integrity of the organic standards,
4 and a warm welcome to the new members.

5 I also wanted to say Driscoll's greatly appreciates
6 NOP staff. Your work is vital to the organic community. Hang
7 in there throughout the terminal, and know you have industry
8 support behind you.

9 My comments today focus on risk-based certification,
10 residue testing, compost agenda items, and crop sunset
11 materials. As someone who works with hundreds of growers, I
12 appreciate the request for feedback on the classification of
13 risk-based certification. As part of the IFPA Organic
14 Committee, we recommend a data-driven approach to developing
15 risk levels so NOP can streamline investigations into areas of
16 potential fraud, and more quickly respond to red flags. We
17 suggest that the NOSB consider risk factors like commingling,
18 premium rates, state reporting systems, climate events, and
19 producer knowledge and history when evaluating the definitions
20 of risk. We also caution that there may be unintended
21 consequences of defining risk within the market, so the
22 valuation criteria should be nuanced to avoid specific crops or
23 regions being accidentally singled out or disincentivized from
24 being grown.

25 Drawing upon tools developed from SOE, certifiers

1 could also reference Operations Organic Fraud Prevention Plans,
2 or FPPs, when determining risk criteria.

3 Regarding the NOSB question about the value of
4 informing downstream supply chain recipients when known
5 prohibitive substances are discovered on organic products, IFPA
6 believes this may have similar complications and impacts as a
7 food safety recall, damaging brand reputation, and reducing
8 consumer confidence in the organic integrity of products. We
9 recommend maintaining the 5 percent EPA tolerance since
10 different certifiers and labs have different tools to detect
11 residues below the threshold, which could implicate some
12 growers and not others.

13 On composting, I would like to reiterate IFPA's
14 stance from the Fall 2024 NOSB comments. Compost production
15 should be evaluated until there is a consensus on the best
16 decision. Additional annotations on uses for these products
17 could create more barriers to approval by certifiers.

18 Lastly, Driscoll supports the relisting of
19 insecticidal soaps, aquatic plant extracts, potassium
20 hypochlorite, and lignum sulfonate in organic production as
21 they are necessary tools for organic growers. Thank you so
22 much for your time and consideration of my comments.

23 CHAIR BRUCH: Excellent. Thank you so much, Emily,
24 for participating here. Are there any questions for Emily?

25 Emily, I am not necessarily seeing any. One quick

1 question, just general comments, and they can be quick, on the
2 impact of SOE to the produce world. We've heard some grain
3 farmers talk about, you know, some of the conditions of SOE.
4 What about from your world in the last year?

5 MS. MUSGRAVE: Yeah, I mean, I think there's
6 definitely -- I think SOE was needed on a lot of fronts, on the
7 fraud front. I do see some things where a lot, for example, we
8 have a lot of -- Driscoll's has some big growers. We also have
9 some really small growers. And so I do see that tying that in
10 to the need for risk-based certification, right? I do see
11 maybe the need for streamlining, right? Maybe not every single
12 grower, in my opinion, needs an organic fraud prevention plan,
13 but certain ones definitely do, right?

14 So I think there's some flexibility there with SOE to
15 sort of implement things on a risk base. And particularly if
16 you have a grower in a high-risk region or high-risk crops,
17 maybe, you know, they should have their organic fraud
18 prevention plan, but a much smaller grower who's had great
19 compliance rate, right, maybe there's not the need for them to
20 put that pressure on them to create an organic fraud prevention
21 plan.

22 So I would just caution. I think there's some really
23 great things about SOE, but again, just focusing on so we're
24 not putting unnecessary burden on some of the small
25 growers. But also, I just want to say, I think the import

1 certificates have been going very well. For us, for
2 Driscoll's, we haven't had any hiccups there. And I think that
3 is one way to sort of catch some of the fraud that's coming
4 into the country. So kudos on that. And I think, you know,
5 just we'll tweak it. I think tweaking things as you go is
6 maybe the right response.

7 CHAIR BRUCH: Excellent. Thank you so much, Emily.
8 Really appreciate your time.

9 MS. MUSGRAVE: Thank you.

10 CHAIR BRUCH: All right. We have Mike Menes,
11 followed by Fiona Buckley, and then Ryan Green. Mike, go
12 ahead. Please state your name and affiliation.

13 MR. MENES: Okay. Good morning. Good afternoon. My
14 name is Mike Menes. I'm the CTO at True Organic Products.
15 Been with the company 16 years now.

16 I want to start out by saying thank you to the NOSB
17 and the NOP for their ongoing work. And a special shout out to
18 the NOP staff. Man, you guys really are doing a great job
19 there. Recently got an opportunity to attend a conference
20 called Organicology. At this conference, there was a session
21 in particular called, and it was focused on Gen Z. The title
22 of the session was called How to Win Their Hearts in Carts.

23 It was a group from the University of Oregon that was
24 really focused on the marketing of organic. And it was really
25 a fantastic -- really impactful session for me. And the

1 takeaway for me was that Gen Z, as far as Gen Z goes, they like
2 a story, they like authenticity, and they have like an eight
3 second attention span. They claim 90 percent of the Gen Z
4 surveyed were either committed as aspirational or organic
5 buyers or committed organic buyers.

6 I have kids that are Gen Z, and so it was kind of
7 like hearing my own kids talk. This presentation deepened my
8 own commitment to organic, but even more so deepened my resolve
9 to protect the USDA organic seal. One way to do that is
10 through testing. Heard a lot about that today and in the last
11 comment section and before. So I'm here to continue the
12 support -- to support the idea of testing for organic
13 authenticity.

14 We support the proposal and the discussion document,
15 all the details are going to be in our written comment. I know
16 I'm taking an opportunity here to just reflect a little bit. A
17 few short years ago, there was distribution of a liquid organic
18 fertilizer that was purposefully blended with aqua ammonia.

19 By the request of our customer, we were required to
20 demonstrate the organic authenticity through testing. The
21 point is that there is technology that exists out there and
22 that can be applied to produce. And because it's been a few
23 years, there is new innovation now to apply.

24 As I mentioned in last NOSB meeting, I support the
25 idea of expanding the testing to be broadened, to be more than

1 just pesticides, but any prohibited substance. As an update,
2 I'm happy to report that the OAC has started the process of
3 developing a method to apply the available technology for
4 authenticity testing.

5 Real quick, I want to give a shout out to the Rickett
6 Smith bill for the Organic Imports Verification Act. So you
7 can see that there's so many different threads that are
8 happening simultaneously. And then you can see that how
9 critical the work is that needs to be done here and bringing
10 all these elements together, the requirements for the testing,
11 the policy itself, the actual testing, the labs that can do
12 it, the education of the certifiers and the use of the
13 information for enforcement, all to give Gen Z a future for
14 buying organic that they are interested and are willing to pay
15 for as long as it is authentic.

16 I humbly request for the NOSB to continue the work on
17 organic integrity. Thank you.

18 CHAIR BRUCH: Mike, thank you so much. I want to
19 open it up to the Board for any questions for Mike. I'm not
20 seeing anything, but Mike, I have something for you.

21 You kind of briefly alluded to this. And I remember
22 from prior Board conversations on -- actually it was nitrogen
23 authenticity and testing with that. You mentioned some of the
24 innovation. Could you just briefly touch on how clear the
25 results could potentially be from identifying something that

1 was synthetically, that a synthetic nitrogen source was used
2 versus a non-synthetic nitrogen source. Is that pretty clear
3 in the test results or would there be a cause of concern? I'm
4 just applying this thought process to have this discussion
5 document on proving willful intent. Didn't know if testing
6 would be a potential tool for that type of determination.

7 MR. MENES: Yeah, I appreciate you asking that
8 question, Amy. And because of the innovation that happens out
9 there, the more testing that you do, the better acuity that you
10 would get on that. Certainly for one suggestion would be to
11 start out with a screening type test like nitrogen isotope
12 testing. Initially, there could be factors that contribute to
13 that varying number for the result. Hence a gray -- a
14 particularly gray area and depending on what the matrix might
15 be.

16 At the same time, there are results that come back
17 that really focus on being able to say, hey, this is not
18 organic. So the question would be, is it truly organic or is
19 this really just synthetic or a conventionally grown
20 thing? But by adding additional tests, you can start to add
21 more data to that. It's like the CSI, if you will, to be able
22 to add more tests to be more convincing or compelling for that.
23 Yeah, more testing, more data.

24 CHAIR BRUCH: Excellent. Thanks for highlighting
25 some of that innovation. Any other questions for Mike? All

1 right. Thank you again, Mike. Really appreciate it. We're
2 going to move on to Fiona Buckley followed by Ryan Green and
3 then Justin Raikes. Go ahead, Fiona. Please state your name
4 and affiliation.

5 MS. BUCKLEY: Okay, can you hear me?

6 CHAIR BRUCH: Yes, we can.

7 MS. BUCKLEY: Okay. Hello Board, Madam Chair. Thank
8 you for the chance to comment today. My name is Fiona
9 Buckley. I'm the owner and operator of Rathbunden Farm. We
10 are currently transitioning to organic. My background is in
11 biochemistry and I'm also a practicing physician
12 anesthesiologist.

13 We have eight employees at the farm, all of them have
14 college degrees, some have master's and three of them
15 coincidentally have environmental science degrees. Our farm is
16 located on 50 acres north of Bozeman in Montana. I comment
17 before you today with a practical request and a call to
18 action.

19 On our farm, we raise vegetables and cut flowers
20 along with a host of pollinators, predatory insects for pest
21 control, and thriving wildlife populations, including elk,
22 antelope, hawks, terriers, wild turkey, cranes, bald eagles,
23 and golden eagles, et cetera. I also serve as a physician in
24 my community. And so today I'd like to focus my comments on
25 two topics. One, compost. And two, why organic is the path to

1 making America healthy again.

2 First, compost. There is an absolute need for the
3 organic community to help be the solution for maximizing how we
4 retain nutrients in our communities. When I sell my vegetables
5 and cut flowers, I want a system that allows me to bring what
6 isn't used or what is wilted back to the farm. I want to keep
7 my soil and farm as healthy as possible. That is a huge
8 emphasis for us on this farm, building soil and making soil
9 healthy. But the standard cannot be so high that organic
10 approved compost isn't achievable.

11 I cannot stand fruit stickers and compostable plastic
12 forks as much as the rest of you. They are maddening. But if
13 I cannot use local compost created by local companies that I
14 know and trust, I feel I'll have to forego organic
15 certification and simply explain to my customers why I believe
16 local compost is the healthier choice for our farm, for the
17 environment, and for them.

18 That being said, I want us to be organic certified
19 and I want this program to work for us and for other like-
20 minded companies. I urge you to support the proposal before
21 the NOSB today to reaffirm that the NOSB has the mandate and
22 the authority to approve synthetic substances allowed in
23 organic production.

24 Secondly, as a physician in my community, I can tell
25 you that America is really unhealthy. Our institutions have

1 not seen food as medicine. I preach this all the time in my
2 other job as a physician. The cafeteria in our local hospital
3 serves food from Cisco trucks, despite the fact that it is
4 located in an agricultural valley. When I discuss with the
5 administration of my hospital a transition to local and
6 organic, I get a range of responses from, it's too expensive,
7 it's not a priority, to organic food is elitist and not
8 appreciated by most patients and staff.

9 In my community and in the greater state of Montana,
10 not only do we lack ready access to organic food in many
11 places, we don't have access to food that hasn't been ultra-
12 process.

13 As I transition to organic certification, I see how
14 easy it is to keep this tent small. I don't think -- okay, so
15 this is my --

16 CHAIR BRUCH: Yeah, you can finish your sentence if
17 you would like.

18 MS. BUCKLEY: Okay. If we want to make America
19 healthy again, we need to do it with organic food, but we need
20 to make this a system that is accessible to all and is seen as
21 something that is practical to all Americans.

22 CHAIR BRUCH: Okay, thank you for finishing your
23 sentence. I will open it up to any questions from the Board
24 here or comments. Well, I guess, sorry, I'm going to restrict
25 comments, questions. I see two hands. We're going to go to

1 Allison first and then Logan. Thank you.

2 VICE CHAIR JOHNSON: Thanks for your comments, Fiona.
3 You said that you want to be able to continue sourcing local
4 compost, that's a priority. And I wasn't sure if you felt that
5 the local composters have contamination from things like fruit
6 stickers and compostable forks, or if you want those kept out,
7 or if you want them allowed to be in, could you clarify that
8 point?

9 MS. BUCKLEY: Yes. Sorry, what I'm actually saying
10 is that I think we need to have a more lenient standard for
11 what is allowed to go into compost so that local composters who
12 are actually doing the right thing, who are collecting food
13 waste from around this town, are not being shut out of organic
14 certification and organic farms buying their compost. We make
15 some of our own compost here, but we're not able to make
16 enough. And so we have to supplement it with outside organic
17 stuff.

18 And there's sort of this irony. I mean, it's hard
19 for us to not kind of laugh when the reason that a local
20 composter is not being certified or is not, compost doesn't
21 qualify is because there's fruit stickers or because they're
22 composting containers that are said to be compostable. I mean,
23 I look at some of the things that end up in our compost, tape
24 from cardboard inevitably slips in there. We find trash in our
25 compost occasionally that we have to pull out. I mean, this is

1 just the reality of composting. And I mean, everyone on my
2 farm buys organic food. We really try to avoid plastics. On
3 our farm, we really work hard to avoid single-use plastics. We
4 buy the thickest seed trays you can get. They're very
5 expensive. We buy the thickest irrigation. Our drip tape is
6 all 15 millimeter. We don't use polyethylene for our
7 tarps. We only use polypropylene. We're really concerned
8 about plastics degrading and microplastics getting in the
9 soil.

10 But we use plastics and plastics are part of life and
11 microplastics are ending up in the soil no matter what we
12 do. So microplastics are here. It's too late to take them
13 out. And we just have to find a solution to move forward with
14 them and to then penalize a small company, like a small
15 composter who's local because microplastics are getting into
16 their compost. It's not even their fault. And then penalize
17 the farm who's using their compost seems to be really missing
18 the forest for the trees.

19 CHAIR BRUCH: Thanks for clarifying. A little bit
20 more proactively. Logan, quick question here and then we're
21 going to move on to the next speaker.

22 BD. MEM. PETREY: Allison asked my question. Good
23 luck with your operation. That's inspiring. Thank you.

24 CHAIR BRUCH: Thank you, Logan. Sorry about this,
25 folks. Really appreciate your time here today, Fiona. We're

1 going to move on to Ryan Green, followed by Justin Raikes and
2 then Artie McKim. Go ahead, Ryan. Please state name and
3 affiliation.

4 MR. GREEN: Hello, my name is Ryan Green and I am one
5 of the owner/operators of Happy Trash Can Curbside Composting
6 located in Bozeman, Montana. And I am the aforementioned local
7 composter that Fiona was discussing.

8 I am making comments regarding the petition to
9 include certified compostable materials and feedstocks for OMRI
10 approved compost. I appreciate this Board's time and
11 consideration regarding this topic.

12 As a local business that has worked in our community
13 to provide compost pickups and compost sales, we have worked
14 with many farms over the last nine years to provide high
15 quality compost to local growers who are not certified
16 organic. During the last seven years of operations, we have
17 accepted third party certified compostable materials because of
18 the increasing demand in our community for finding an
19 alternative to single use plastics. We work with many farmers
20 markets, events, and institutions who require vendors to use
21 compostable materials to collect these materials and complete
22 their life cycles.

23 We take creating a safe finished compost seriously
24 and understand the risk involved by accepting these materials,
25 mainly risk of contamination and unwanted by-products. One way

1 we have addressed this is by taking part in a nationwide
2 infield study through the closed loop partners. From this
3 study, we confirmed what we have always known, these materials
4 do break down completely in our ASP systems and do not increase
5 contamination. We also take part in PFAS studies to understand
6 the risk associated in with accepting different feedstocks.

7 What we are experiencing recently is the local
8 organic certifier reaching out to many local farms that we have
9 worked with over the years to become organic certified. This
10 is not possible due to the use of our compost, which producers
11 are aware of. We are hoping the Board might be able to provide
12 a case by case exemption or alternative for producers that wish
13 to be certified, but want to use a locally produced compost
14 that works in the same community that they do to promote a
15 closed loop economy. We are accepting these material because
16 our community wants an alternative to single use plastics and
17 we believe the compost industry, manufacturers, certifiers,
18 haulers, processors, et cetera, are working to make sure that
19 these materials pose no long-term harm to soil or human
20 health.

21 In Montana, we are already seeing producers forgo
22 organic certification in support of utilizing locally made
23 compost as opposed to trucking it in from further away in the
24 state or outside of the state, which of course increases
25 emissions which are ultimately harmful to all producers. We

1 believe that there can be a way to include third-party
2 certified materials in feedstock that pose no more risk to soil
3 or human health than contamination from plastic mulch or drip
4 tape.

5 As an individual who has worked on many certified
6 organic farms in many different states over the years, my
7 understanding that these tools utilized by producers, leach
8 man-made synthetic plastics particulate back into the
9 soil. This comment is not meant to dissuade the use of these
10 tools, but rather support the inclusion of other tools like
11 locally produced compost made with third-party certified
12 materials and our local producers toolbox. I thank you for the
13 time and consideration. I do hope the Board is able to see
14 that there are instances and producers procuring compost that
15 is currently OMRI approved compost is not always the best or
16 most environmentally friendly alternative for their
17 production. Thank you very much for your time.

18 CHAIR BRUCH: Thank you, Ryan. I appreciate you
19 finishing your last sentence there. Do we have any questions
20 from the Board for Ryan here? I'm not necessarily seeing any,
21 Ryan. Do you know any work that's happening on just the
22 reduction of single-use plastics in general, kind of more
23 tracing the problem upstream for root cause? Is there any
24 reduction of single-use plastics?

25 MR. GREEN: I -- you know, in our community in

1 Bozeman, there was a voter's initiative that passed to ban
2 single-use plastics in our community. That ultimately was
3 overturned by a state court saying that communities can't, you
4 know -- a ban on band essentially. I can't really say -- you
5 know, I know that through the closed loop partners and the
6 study we took part of, that that study was funded through many
7 organizations and businesses that are currently producing
8 single-use petroleum-based plastics to verify that the
9 certified compostable polymers that they are hoping to move
10 their products to actually break down in the field. And to
11 clarify on maybe one of Fiona's comments about microplastics
12 ending up in our compost, we test every batch.

13 CHAIR BRUCH: Sorry, Ryan. I'm going to have to cut
14 you off because we just don't have time to go too far outside
15 the question scope. Okay.

16 Logan, do you still have a question there?

17 BD. MEM. PETREY: He was on it. It's fine. He said
18 he was testing the plastic levels in his compost, that's what I
19 was going to ask.

20 CHAIR BRUCH: Okay. 10-4. Thanks, Logan. Nate,
21 we're going to go to you next.

22 SECRETARY LEWIS: Yeah. Briefly, Ryan, can you talk
23 about, of the compostable plastics or single-use items that do
24 come into your facility, how much, in your view, actually get
25 composted versus get screened out in the overs in the screening

1 process?

2 MR. GREEN: I would say that well above 95 percent of
3 the material actually breaks down in our piles and does not get
4 screened out through the overs. Certainly there is material
5 that is on the exterior of the piles that doesn't get fully
6 broken down, but we have always seen high success rates of the
7 breakdown of this material. We do utilize gore cover ASP
8 systems, so we are able to hit the timeframes necessary and
9 temperature.

10 SECRETARY LEWIS: Just for the record, a gore system
11 is a static aerated pile as opposed to a turned in row.

12 MR. GREEN: That is correct. Thank you.

13 CHAIR BRUCH: Okay. Thank you. And Ryan, again, I
14 apologize for the interruptions. I'm equal opportunity
15 interrupter right now for being task manager. Okay. Thank you
16 again for commenting and we're going to keep moving on our
17 speaker list.

18 We have Justin Raikes and Artie Kim, followed by Neil
19 Edgar. Justin, go ahead. State name and affiliation. Thank
20 you.

21 MR. RAIKES: Excuse me. Thank you. The NOSB Board,
22 I'm Justin Rakes. We are a farm in Eastern Nebraska. We grow
23 organic food grade and feed grade corn, field peas, small
24 grains, some forages, and then grudgingly occasionally we'll
25 grow soybeans too, but under heavy protest. I'm also involved

1 in a conventional cow feeding operation.

2 I've got a couple of points for you today. First,
3 with regard to testing, there's been a lot said, so I don't
4 want to repeat ground that's already been covered, but we
5 support the push for greater testing. We support the
6 initiatives that are on the table right now.

7 Basically on the organic side, everything we do,
8 including forages, get some sort of GMO presence absence,
9 ranging from some to very, very substantial residue testing
10 that some suppliers now ask us to test seed in advance, just to
11 make sure to double check that we've got what we think we have
12 in the bag. So this is something we're already doing. We
13 support further the testing. We support that greater
14 transparency in that process.

15 And the second, there was a little bit of discussion
16 a couple of speakers ago that I thought was relevant. With
17 respect to the cost of these imports and the cost of foreign
18 products, I want to talk about that briefly. So one thing
19 that's really stood out to me over the last couple of years is
20 we've gotten better at this is our cost of production, let's
21 say on something like corn, is actually quite close to our
22 conventional cost of production. The way we're able to do that
23 is with extensive use of mechanization. We have a lot of
24 different tools. We are the people out buying junked out
25 cultivators that were popular 20 and 30 years ago, prior to

1 chemistry taking the place that it has. Plus, we're using the
2 latest, greatest, like I said, the guide hitches, the zappers,
3 all those tools. We've got a lot of tools in the toolbox
4 because our whole goal is to not use hand labor to try to
5 basically get us to where we want to go in terms of weed
6 control and the final outcome.

7 Hand labor for us is cost prohibitive and has the
8 potential to take us from whatever we think our profit margin
9 is to a loser very quickly. So I would point that out in
10 context to this statement that hopefully you all will not find
11 too controversial, which is that often United States corn belt
12 is the cheapest conventional GMO produced corn in the
13 world. And our costs are not the same as every other organic
14 producers. Some are higher, some are lower, but I would
15 venture that if our conventional corn cost is most often the
16 cheapest in the world and we've got organic costs that are
17 within range of that conventional cost structure, we're
18 producing the cheapest product there is. It's not possible to
19 do it overseas cheaper. So that's just something for
20 consideration.

21 Finally, I -- being involved in the cow production
22 side of producing compost, I would love a greater
23 rationalization of the compost rules. They don't make a lot of
24 sense to us. And we would also love the NOSB to take another
25 look at micronutrient, approved but restricted use

1 micronutrients. We don't really understand those rules
2 completely. Thank you all for your time. I appreciate it.

3 CHAIR BRUCH: Thank you, Justin, for participating
4 here today with us. Any questions for Justin?

5 Justin, just a quick question. You mentioned that
6 you are trying to work on more mechanization for your farming
7 operation, less hand labor. Can you just articulate what maybe
8 the cost of hand labor can amount to if you would not have any
9 mechanization for weed management?

10 MR. RAIKES: Yeah. Sure. And I mean, I'll gladly
11 throw some numbers at this, but basically any given cultivator
12 pass we make is going to cost somewhere between 15 and 25 bucks
13 an acre, inclusive of the machine, inclusive of the fuel,
14 inclusive of depreciation, and inclusive of the fully loaded
15 labor costs of the person running it. Whereas a single hand
16 weeding pass can easily push past \$125, \$150 an acre, depending
17 on what you're asking the crew to do and details like that. So
18 it's very hard to do anything with hand labor that's remotely
19 cost-effective. If that answers your question, Amy, so thank
20 you.

21 MS. ARSENAULT: You're muted, Amy.

22 CHAIR BRUCH: I knew that would catch up with me one
23 time this meeting. Okay, Kyla, I apologize. I didn't see your
24 hand earlier. Go ahead with the question, but thank you
25 Justin.

1 BD. MEM. SMITH: No, no, no, that's okay. Yeah, can
2 you -- your last statement there about not understanding the
3 micronutrient listing, can you say more about that? Is it just
4 not understanding why documentation is required or like what
5 would --

6 MR. RAIKES: No, no, no, I understand the
7 documentation piece. I think that the disagreement I have
8 comes from the fact that essentially what our certifiers have
9 told us is that our agronomist position on the ground is less
10 relevant than a lab's opinion of the range of created
11 aggregated values across who knows how many samples and who
12 knows how many locations. And we're finding unique groundwater
13 conditions. You know, we've had some groundwater quality
14 issues. We're finding other unique problems that call for, I'd
15 say, a little bit more aggressive approach to managing some of
16 these micros and availability and uptake and so forth. And we
17 can kind of get there with tissue testing, but it's not always
18 practical from a management standpoint because it limits our
19 ability to react. So that's kind of my specific issue.

20 BD. MEM. SMITH: Thanks, that's helpful.

21 MR. RAIKES: Yep.

22 CHAIR BRUCH: Thanks, Justin, so much. Good luck
23 this season. Really appreciate your time. We're going to keep
24 moving on the list here. We have Artie McKim, followed by Neil
25 Edgar, then Kim Dykman. Go ahead, Artie. Please state name

1 and affiliation.

2 MS. ARSENAULT: Amy, Artie is not on the line with
3 us. We can't unmute them. I'm going to check once more.
4 Nope, still not seeing him.

5 CHAIR BRUCH: No problem. I'm going to highlight,
6 and we'll try to get Artie back on the line later today. We
7 have Neil Edgar followed by Kim Dykman, then James Schroepfer.
8 So Neil, go ahead, state name and affiliation.

9 MR. EDGAR: Good afternoon. I'm Neil Edgar. I'm the
10 Executive Director of the California Compost Coalition. We
11 appreciate this opportunity to provide comments. Our members
12 are service providers from municipalities throughout California
13 who process yard trimmings, increasingly food materials to meet
14 the landfill diversion goals prescribed in SB-1383, our
15 landmark methane avoidance legislation.

16 Most municipal programs collect compostable packaging
17 along with food waste generated at both residential and
18 commercial sources. As organic material diversion programs
19 grow over the next several years, the importance of providing
20 clean compost to markets will increase immensely. Agriculture
21 is the single largest market for compost in California,
22 representing over two thirds of our sales share now, and it
23 still remains largely untapped.

24 Agricultural production standards for fresh produce
25 continue to elevate under pressure from consumers and other

1 entities in the food production supply chain. Most farmers,
2 both conventional and organic growers, are demanding compost
3 they purchase to be in compliance with NOP standards.
4 Composters already have challenges with product quality
5 perception from potential customers and invest tremendous
6 effort to remove contaminants. Adding more plastic to our
7 systems is not a concept that we support.

8 Even if bioplastics are allowed under NOP, they will
9 largely be removed at our facilities with conventional plastics
10 during pre-processing. We commend the Crop Subcommittee for
11 all their hard work on responding to the BPI petition. We're
12 fully supportive of the recommendations to revise the
13 definition of compost and updates to the technical parameters,
14 which will better align NOP regulations with regulatory
15 standards already in place across the U.S.

16 We support requirements for compostable polymers to
17 undergo an evaluation and petition process, as each individual
18 material has unique properties, production processes, and they
19 have varying outcomes in composting systems and soils. In
20 fact, my colleague, Matt Cotton and I, introduced the
21 bioplastics manufacturers to Bill Wolfe, who began working
22 towards a petition process that was never completed. That was
23 in 2011.

24 We would, however, like to see some clarification in
25 the list of allowed paper and fiber materials as synthetic

1 substances allowed for organic production, which currently only
2 allows newspapers or other recycled paper without glossy or
3 colored inks. I understand there may be recent concerns about
4 newspaper, and many of the current paper packaging products
5 cannot be considered recycled. Even paper napkins, paper
6 towels, other basic paper products used in food service may not
7 be composed of recycled content, yet may have no additional
8 potential impact on compost quality than those that are.

9 Additional definition is sorely needed as to which
10 paper and fiber food serviceware products are allowed. Also,
11 craft paper bags are used in a large number of green waste and
12 leaf collection programs across the country. Our members and
13 others in the packaging production world, I'm sure, would be
14 happy to work with NOSB staff to provide additional information
15 for consideration in expanding the language of this section.

16 CHAIR BRUCH: All right, Neil. Thank you so
17 much. Do we have questions from the Board for Neil? All
18 right, Neil. I'm not necessarily seeing any. I just wanted to
19 ask, how tightly is your organization networked with the
20 recipients of the compost, the growers?

21 MR. EDGAR: We work consistently with a variety of
22 stakeholders across California. Our members have worked with,
23 in the past, with CCOF, OMRI. All of our compost that's sold
24 as organic has to be certified through the Department of Food
25 and Agriculture. I was part of the group that was on the

1 advisory committee to help set up that OIM program to assure
2 that it was meeting standards, and we're constantly engaging
3 with agricultural groups to make sure that we can meet the
4 standards that they demand.

5 CHAIR BRUCH: Okay. Thank you, Neil. I see Nate's
6 hand up. Go ahead, Nate. Quick question.

7 SECRETARY LEWIS: Yeah, just couldn't resist. So you
8 brought up a concept that I've heard often from composters,
9 which is, regardless of whether a plastic is compostable or
10 it's traditional polyethylene, it's largely getting screened
11 out at the end, or at the beginning, depending on your system,
12 because it's impossible to distinguish the substances. And so
13 it sort of inspired a way of thinking about a potential
14 allowance for these in organics that would potentially allow
15 the fruit sticker issue to get resolved with some film
16 allowances, but coupling it with the need for there to be some
17 way to screen out anything that does not get composted.

18 And I'm curious if you have any reaction to that sort
19 of compromised approach that if it's allowed in organic with
20 some sort of depackaging screening element as part of the
21 facility, does that resolve the issue? Or are we sort of
22 grasping at straws and trying to get to a compromise where we
23 don't really need to find one?

24 MR. EDGAR: Well, I think, Dave, if we had a, you
25 know, in a perfect world and all of the bioresin or all of the

1 plastic resins that were out in the market were compostable,
2 and we were just dealing with residual plastic, I think it
3 would be easier to understand how it might work. Right now,
4 the compostable resins are such a minor portion of the plastic
5 stream and composters have to remove contamination both on the
6 front end and the back end.

7 So to the extent that fruit stickers or other
8 residual plastics make it into the composting system, the fact
9 that they may biodegrade and compost during the composting
10 process is a benefit and it would reduce the amount of, you
11 know, microplastics remaining in the final product. But it
12 doesn't -- oh, and at a macro level, it doesn't really solve
13 the big issue, which is we're trying to remove as many
14 contaminants as possible. You can't spend time or you can't
15 bifurcate your system and try to separate compostable plastic
16 from non-compostable.

17 In many cases, they're almost impossible to
18 distinguish, but when they're collected, they're covered in
19 food and they're very difficult to just, so all of the
20 materials have to be removed to the extent possible, both at
21 the front and the back to create saleable product.

22 CHAIR BRUCH: Thank you, Neil. Thanks, Nate. I see
23 Franklin's hand. Go ahead.

24 MR. QUARCOO: Okay. Neil, I'm interested in finding
25 out whether your coalition has taken a look at the effect of

1 biodegradable plastics on soil microorganisms and whether it
2 affects them long-term, short-term, changes their populations.

3 MR. EDGAR: My group has not. So we're a policy
4 group, but we spend an inordinate amount of time working with
5 stakeholders across many sectors, including researchers at UC
6 Davis and other California universities. And I pay attention,
7 a lot of attention to what's going on in other locations
8 regarding the fate of bioplastics as microplastics. And I
9 think there's some emerging evidence and research that's been
10 done that show that compostable resins that do not get fully
11 composted during the composting process have some downstream
12 impacts on soil quality and soil health, similar to other
13 plastics.

14 Microplastics of all kinds are being demonstrated to
15 have soil impacts. And to the extent those resins --
16 compostable resins are contributing to that is something we're
17 hoping we can avoid by, again, by screening those out at the
18 front as much as we can and making sure that the compost
19 processes that are being employed by our members are robust and
20 can fully degrade the material as it's intended to be, if it's
21 in fact in the mix of materials that we use as feedstock.

22 CHAIR BRUCH: Thanks, Franklin, for the
23 question. And thanks, Neil, for your time. We're going to
24 keep moving. We have Kim Dykman, followed by James Schroepfer,
25 and then Sam Parker. So go ahead, Kim. Please state name and

1 affiliation.

2 MS. DYKMAN: Hi, my name's Kim Dykman. I'm a
3 consultant with Agrisecure. I work with 24 growers, helping
4 them to get through the certification process every year.

5 One barrier to certifying growers and growing them,
6 or our number of organic growers, is market availability. What
7 can be done to grow organic markets and keep them secure? I
8 support more rigorous testing of crops to ensure organic
9 integrity. We need to keep crops authentically organic,
10 especially bushels coming into the U.S. Also, the further
11 south you go into the U.S., the harder it is to farm
12 organically due to weed and insect pressure.

13 I have a new guy in Georgia who's very worried about
14 the amount of tillage that's going to be required, and he has
15 not been able to find any other organic operations near him to
16 consult, and he's really concerned about markets for his crops.
17 We need common sense and approval of the application of
18 micronutrients in order to improve soil health. I have a
19 grower trying to get approval for a seed box flow agent that is
20 OMRI approved, which has minute amounts of several micros that
21 are only for germination and seed separation, but will not
22 affect the soil. The requirement for soil testing showing
23 deficiency in these applications really needs to be looked at
24 from an agronomic perspective.

25 This is only one instance, but I've come up against

1 this several times with testing required to show deficiency for
2 a product that has minute amounts of micronutrients, and it's
3 an OMRI approved product as well.

4 As far as the certification process goes, we have so
5 much focus from the certifier for us to provide seed tags,
6 affidavits. It's just not balanced out by the level of
7 intensity on other parts of the certification process,
8 especially as it relates to transaction and settlement.
9 I spend so much time on seed information for the
10 certifier. Why aren't we spending equal amounts of time on
11 proving that transactions are not fraud? We would very much
12 like to hear more from the NOP about how fraud is being
13 prevented at the ports. How many surprise inspections are
14 being conducted on organic products at ports?

15 We need more intensity focused on oversight and
16 enforcement at a national level. And finally, it's especially
17 hard for growers in the Midwest to make time to comment this
18 time of year due to time constraints at planting, and they're
19 concerned and want to make their viewpoints known. So I just
20 want to say thank you to everyone who made time to comment
21 today, and thank you to the Board for hearing all of our
22 comments. Thanks.

23 CHAIR BRUCH: Thank you, Kim. I definitely elevate
24 your comment about farmer participation and taking time away
25 from their operations to be a part of this. All right. Any

1 questions for Kim? All right. Kim, I'm not seeing anything,
2 but thanks for your work for the organic growers. Appreciate
3 it. Great.

4 We're going to keep moving on to James Schroepfer,
5 followed by Sam Parker, and then Leo Schoenauer. Okay. James,
6 are you with us?

7 MR. SCHROEPFER: Yes, I am. Good afternoon.

8 CHAIR BRUCH: Please say your name and affiliation.

9 MR. SCHROEPFER: My name's James Schroepfer. I'm a
10 co-owner and operator with my brother of Sandy Plains
11 Farm. We're a 650-acre diversified crop and beef operation in
12 central Minnesota.

13 I'm going to comment on current market conditions and
14 offer several suggestions that potentially could help. I grew
15 up and have worked on numerous organic farms, eaten organic my
16 entire life, and currently have been farming for the last 10
17 years organically. I'm a certified crop advisor and worked
18 with a significant number of organic producers of every shape
19 and size across the upper Midwest over the last 14 years.

20 Part of what I do is financial planning with the
21 organic and conventional farms I work on. With our current
22 pricing in this organic market, most organic operations are at
23 break-even at best, and many, especially the small and mid-size
24 operations, are forecasting a loss for back-to-back years from
25 the extremely low prices and lack of demand of organic grains

1 and livestock products.

2 Data like this can be collaborated by data from Farm
3 Business Management, different universities, McHarris (ph),
4 Scenic Organic Valley, shutting down their organic meat
5 division, and just by talking to many farmers that are
6 struggling to put food on their tables or pay their bills.

7 On our own farm, for example, the bank looked at the
8 numbers on the organic side when we finished buying out our
9 senior partner three years ago and would not provide a loan to
10 finish buying out our partner on the organic beef side as it
11 was less profitable than the conventional, and we had to
12 downsize our herd to what we could pay for in cash.

13 I'm already seeing farmers selling out with these
14 unsustainable prices where they are drastically altering their
15 crop rotations to do all row crop production, where at least,
16 weather permitting, they might show a profit. Despite the
17 government funding dollars, which if market prices are
18 attractive are completely unnecessary, and without attractive
19 prices are fruitless, we are seeing a drop in farms and farm
20 acres.

21 If our market manipulations and questionable foreign
22 grains and livestock products are not addressed in short
23 order, the legacy of this current -- will be the death of the
24 small, mid-sized organic farms who consistently produce organic
25 products with their common ecological and environmental

1 practices exceeding the minimum list in organic standards, and
2 the market will be consolidated, like the conventional
3 market, to a few large operations who consistently work in the
4 gray areas at the minimum to meet the organic standard as a way
5 to stay profitable.

6 We also see our church members, extended family and
7 friends who are questioning the legitimacy of our organic
8 label. They feel betrayed, especially having paid their
9 organic premium for years as how much we import from other
10 questionable countries known for fraud around the world comes
11 to light over time. Where is the transparency and the ability
12 to choose for the consumer? Can we not have a mandated label
13 of origin from where the product was grown to allow the
14 consumer choice? If we do not allow our consumer with
15 transparency and choice, we will lose them.

16 We do a mass ballot for our grain and livestock every
17 year as part of our annual organic inspection. When we see
18 Nigeria as shipping 400 plus bushel per acre of organic
19 soybeans while the world leading country, Brazil, produces an
20 average of 53 bushels per acre conventionally, how can we not
21 get the impression of fraud? Why, like here in the United
22 States, is not every bushel traceable back to the field of
23 origin? Why can it not be public who are the bad actors and
24 why is there no transparency to the public on what happens to
25 the bad actors? What are the repercussions to the entities and

1 people?

2 Given the lack of ability to enforce on those
3 overseas, is it not justifiable to mandate that operate under
4 heightened scrutiny? We pay for an inspector to site inspect
5 our own farm every year. Can we not have the same standard for
6 anyone who wishes to sell into our U.S. organic market?

7 Residue testing for foreign imports --

8 CHAIR BRUCH: James, I want you to finish your
9 sentence and then we're going to have to open it up to
10 questions. I apologize. Can you finish your sentence here?
11 Okay.

12 MR. SCHOEPFER: Okay. My last sentence is in
13 regards, rather than doing residue testing on a domestic level,
14 the NOP could have directly hired an agronomist who could do
15 site inspections, field inspections at time of planting and
16 through the early growing season to identify whether or not
17 chemicals are being used. This would lower the cost of the
18 residue testing to U.S. producers at least. Thank you for your
19 time.

20 CHAIR BRUCH: Thank you, James. Really appreciate
21 you taking the time to join us here. I'm going to open up to
22 the Board for any questions.

23 James, I wanted to ask you, we do have a vote on
24 testing for the Board and it's looking at just providing better
25 instruction to certifiers for testing. Is that something, I

1 couldn't quite catch the last little bit of your sentence. Is
2 that something that you would be in support of?

3 MR. SCHOEPFER: I think domestically, when we look at
4 the cost and implementation of that, it might turn into a beast
5 in and of itself. I think it could be solved by the NOP having
6 direct agronomists working underneath them to do site
7 inspections, especially for anyone that's red flagged as a
8 potential fraud candidate. And if they did inspections in the
9 field, I've done this for years, you go and you can see if
10 there's overspray, if there's drift, if the plants along the
11 edge of the field have chemical injury. I think we could on a
12 more quickly and cheaper basis identify potential domestic
13 fraud doing this rather than residue testing.

14 CHAIR BRUCH: Got it. Thank you for elaborating on
15 that. Any other questions for James?

16 Good luck this season, James. Thank you
17 again. Really appreciate it.

18 MR. SCHOEPFER: Thank you.

19 CHAIR BRUCH: All right. We have Sam Parker and
20 sorry, James, I wanted to say I apologize on the
21 mispronunciation of your name. Going on to Sam Parker and then
22 Leo Schoenauer, and then we're going to have a break. So Sam,
23 please state name and affiliation.

24 MR. PARKER: Hi, my name is Sam Parker from Parker
25 Orchards. Good afternoon, NOSB. I'm a fifth generation pear

1 farmer from Washington State. I currently farm 150 acres of
2 conventional and organic pears, which 16 acres have been
3 organically farmed since 1989 in the Wenatchee Valley.

4 I'm here today to express my support for the
5 continuing use of Pear Ester DA in scouting traps and pheromone
6 mating disruption products and sprayable DA mech for monitoring
7 and management of codling moth. I remember in the early years
8 of organic pear production when there was no Pear Ester DA, it
9 was virtually impossible to organically farm as there was no
10 way to monitor codling moth phenology or control them with
11 organic approved pheromones. This resulted not only in
12 unnecessary sprays, but timing of sprays that missed the peak
13 of egg lay. We would have crews whose sole summer job was to
14 thin off codling moth strikes. And at the end of the day, my
15 father would mow up perfectly good pears merely because of moth
16 strikes.

17 And one day a solution came for all organic fruit
18 growers in the form of Pear Ester DA. Since its release, the
19 Washington State organic pear and apple industry has
20 boomed. As a member of the Washington State codling moth task
21 force, I have seen firsthand the devastation that occurs
22 without the help of Pear Ester DA. There are already organic
23 growers in our fruit industry that are struggling with codling
24 moth control. Without this product, our growers will take a
25 major financial hit in order to control codling moth. In

1 closing, if we have to go back to controlling codling moth the
2 same way we did 36 years ago, which was no control, the organic
3 tree fruit industry may no longer exist. Please consider
4 allowing the continued use of Pear Ester DA. Thank you.

5 CHAIR BRUCH: Thank you so much. I'm going to open
6 it up to the Board for any questions here. Not seeing
7 anything. Really appreciate your time and just contributing to
8 our common experience here.

9 We're going to move on to Leo Schoenauer. And then
10 we're up for a break. Leo, are you on the phone?

11 MR. SCHOENAUER: Yes, I am. Can you hear me?

12 CHAIR BRUCH: Yes, I can. Yep, please state your
13 name and affiliation and go ahead.

14 MR. SCHOENAUER: Perfect. Hello, I'm Leopold. I'm
15 with Marroquin Organic and we are a certified USDA organic food
16 handler based in Santa Cruz, California.

17 We have been in the organic business for more than 30
18 years and we request that cornstarch is being removed from the
19 national list as the inclusion of cornstarch is no longer
20 needed. We believe that organic cornstarch is fully
21 commercially available in the appropriate form, quality and
22 quantity.

23 To guide my argument, I want to focus on the handling
24 subcommittees questions. And the first question had been as
25 the following. In the past five years, the number of suppliers

1 of organic cornstarch yearly has tripled. Does this mean that
2 there are or that there is a sufficient supply of organic
3 cornstarch? And yes, we believe there is definitely a
4 sufficient supply of organic cornstarch as we have been
5 distributing organic corn starch in the U.S. since 1996.

6 And in addition to our offerings, the demand can not
7 only be covered by us, but also by our partners, but also
8 competitors. The organic market, we believe is well positioned
9 to meet the future demands, even for a significant increase of
10 the supply as the supply chain is prepared to scale
11 accordingly.

12 Over the past five years, there had been no reported
13 shortages that we are aware of in organic corn starch. And the
14 supply has proven to be stable, reliable, but also scalable.
15 And even in during the COVID-19 pandemic, the demand of organic
16 corn starch nearly doubled. And even then, during this
17 exceptional situation, suppliers were able to fulfill orders in
18 terms of both quality and quantity.

19 The second question had been, are there any barriers
20 to use organic corn starch? And why would organic corn starch
21 and non-GMO corn starch not be completely interchangeable? Our
22 opinion is that native conventional corn starch is definitely
23 interchangeable with their organic counterparts. And the
24 market also offers sufficient version of organic corn starch
25 that can replace even functional clean label starches without

1 significant modifications. Corn starch users can confidently
2 use our organic offerings available to ensure product
3 appearance, taste, but also performance, so that they remain
4 consistent with the consumer's expectations.

5 In the past, commenters have stated a lack of organic
6 molding starch, which is used in gummy production. And due to
7 significant investment that was made by Marroquin, but also our
8 parent company Agrana, we have now successfully filled also
9 that last niche.

10 The third question had been, is there a sufficient
11 supply of non-GMO conventional corn starch? And yes, the
12 answer is definitely yes, there is a sufficient supply of non-
13 GMO corn starch, but there is also a sufficient supply of 100
14 percent organic certified corn starch. Thank you.

15 CHAIR BRUCH: Leopold, thank you for your comments
16 today. I'm going to open it up to the Board for any questions.

17 BD. MEM. HATZIYAANIS: I have a question.

18 CHAIR BRUCH: Yeah, I see Allison's hand and then --

19 VICE CHAIR JOHNSON: I think Andrea's first, go
20 ahead.

21 CHAIR BRUCH: Oh, Andrea, sorry. I couldn't tell who
22 was speaking up there. Go ahead, Andrea, thank you.

23 BD. MEM. HATZIYANNIS: Okay, I couldn't find my
24 virtual hand.

25 CHAIR BRUCH: No worries.

1 BD. MEM. HATZIYANNIS: Thank you for the discussion
2 on the organic availability of the corn starch. I know there
3 are many different types of conventionally available modified
4 corn starch. Is the research stating that the organic corn
5 starch available will replace all of the modified corn starch
6 or just the regular -- there's three types and want to
7 understand if it was targeted to all three types.

8 MR. SCHOENAUER: Well, the basic classification is
9 there is native corn starch. There are different versions of
10 native corn starch like pre-chelotonized corn starches. There
11 are clean label corn starches, which are the clean label
12 alternative to modified starch. And there are chemically
13 modified starches. And chemically modified starches as such
14 are not even allowed even though corn starch is on the national
15 list. So it's not allowed to use chemically modified starches
16 in organic production.

17 So if you want to use corn starch in organic
18 manufacturing, you anyway already now need to use clean label
19 starches. And we do have alternatives for that particular kind
20 of clean label starches in organic quality. And so do our
21 competitors. So we believe that from what customers or
22 producers need to use right now, if they're using non-organic
23 corn starch in their formulations, there is no reason why they
24 could not use the organic counterparts because they are
25 definitely inter-exchangeable.

1 BD. MEM. HATZIYANNIS: Thank you for confirming.

2 CHAIR BRUCH: All right, Andrea, thanks for flagging
3 me down again. Good question. We'll move on to Alison.

4 VICE CHAIR JOHNSON: Yeah, thanks so much for your
5 comments, Leo. Are there -- you kind of touched on this
6 already, but are there technical barriers to -- that make
7 production of organic corn starch harder than a non-organic
8 version or any bottlenecks around the raw ingredients that we
9 should consider as we're looking at this material?

10 MR. SCHOENAUER: Well, it is definitely harder to
11 produce organic corn starch because obviously you need to grow
12 the certified organic raw mat. And then you need to have
13 dedicated production runs or facilities that are only running
14 organic or where you're able to separate those productions from
15 the conventional non-GMO corn starch productions.

16 So yes, it is more difficult, it is complex, but this
17 is what we do. And there is a sufficient supply of organic
18 corn out there. So from a raw material perspective, but also
19 from a capacity perspective, we do not see a limitation that
20 would justify keeping corn starch on the national list.

21 CHAIR BRUCH: Great, thank you.

22 MR. SCHOENAUER: Thank you.

23 CHAIR BRUCH: Thank you, Leopold. Thanks for that
24 discussion there. We are right at the break and I recommend we
25 return back at 45 past the hour and we will continue to keep

1 our meeting on track here. Thank you guys, see you shortly.

2 Oh, and then I guess I'm going to announce our next
3 speakers, which are Stephen Boyda, Kurt Lensing, and Megha
4 Patel. So that's where we'll be at when we pick up again.
5 Thank you.

6 (Recessed at 3:30 p.m.; to reconvene at 3:45 p.m.)

7 CHAIR BRUCH: Back everybody. We are in the last
8 segment of the day for our public comments. And just as a
9 reminder, we are trying to adhere to our schedule as closely as
10 possible. So I apologize for any interruptions that I might
11 interject.

12 All right. We're going to get started with Stephen
13 Boyda, followed by Kurt Lensing and Megha Patel. Go ahead,
14 Stephen.

15 MR. BOYDA: Hello, and thank you for the opportunity
16 to speak. My name is Steve Boyda and I'm a certified organic
17 farmer from Northeast Kansas. I'm also a member of the
18 certified Central Plains Organic Farmers Association and
19 recently elected the president of O-Farm. We have been
20 certified since 2015. Our operation consists of approximately
21 275 acres of crop ground and about 450 acres of pasture. We
22 primarily grow corn, soybeans, wheat, cattle forages and
23 utilize as many cover crops as possible for our fertility.

24 We also have a cow-calf operation where we finish in
25 direct market both black Herefords and a Hereford Wagyu mixed

1 breed for cattle beef. The livestock is not certified, but
2 they're finished on our organic grains.

3 Brief background. This is a second career for me. I
4 had the opportunity to return to the farm and farm the land
5 that has been in our family since 1903. My only farming
6 experience prior to this was assisting my grandfather and
7 working for the neighboring farmers during high school. I
8 mention this because organic farming was a significant factor
9 in preserving our family farm and preventing its acquisition by
10 some local conventional farms.

11 Some of the factors that influenced our decision have
12 evolved substantially over the past decade and are very
13 concerning. Imports are no longer solely used to supplement
14 domestic supply, but also to establish prices for domestic
15 organic production. Until recently, there was minimal
16 enforcement or verification of imports. As domestic organic
17 producers, we are required to demonstrate traceability back to
18 the field and mass audits, which leaves me to question how a
19 ship loaded with millions of bushels can maintain the same
20 level of traceability.

21 NOSB and its licensed certification agencies must
22 demand the playing field be leveled to prevent imports from
23 further depressing the prices received for domestic production,
24 severely impacting the profitability and sustainability of
25 family farms such as ours. I strongly urge NOSB and NOP to

1 make decisive action and vigorously police imports in order to
2 credibly ensure their legitimacy. Furthermore, we owe it to
3 our consumers who are expected to pay a premium for organic
4 products.

5 The second concern is erosion of organic standards or
6 the introduction of loopholes, such as hydroponics, large-scale
7 livestock options, operations, and the lack of requirements for
8 diverse cover crop rotation, and encouraging purchase of all
9 farm inputs.

10 A consequence to these weakening actions of the
11 USDA's organic seal has necessitated the use of additional
12 labels or certifications for producers like myself to
13 differentiate our production from imports in large-scale
14 industrial organic farms. For instance, we are currently in
15 the process of obtaining regenerative organic certified
16 status.

17 Every add-on label to organic packaging only serves
18 to further confuse our organic consumers, furthermore, multiple
19 optional levels of certification require additional time and
20 resources for producers to distinguish between just USDA
21 organic and other add-on labels for certifications.
22 Realistically, there should only be one level of
23 certification. Thank you for your attention to these matters.

24 CHAIR BRUCH: Stephen, thank you so much for your
25 comments today. I see a question from Brian, go ahead.

1 BD. MEM. CALDWELL: Yeah, Stephen, thanks a lot for
2 your comments. And I'm wondering, you were mentioning sort of
3 some imports issues and that had to do with organic grain, I
4 believe, but beef is actually a pretty high value organic
5 import. And I know that you said that your beef cows are not
6 certified. And I'm just wondering if you could talk a little
7 bit very briefly about the market for organic beef and how you
8 see that.

9 MR. BOYDA: In our area, there's not a demand for
10 organic beef on the level that we would need to justify
11 certifying our herd organic. And for us, we have a pretty good
12 margin for the way we do things and by adding the organic
13 certification would not financially benefit us and would, in my
14 opinion, just cause us more paperwork and issues that we just
15 don't want to address right now or can't financially.

16 BD. MEM. CALDWELL: Yeah, just very briefly, follow
17 up. Do you have any idea where the imported beef is
18 going? Maybe you don't know about it, I don't know.

19 MR. BOYDA: Like I said, we don't have ours
20 certified, and so I haven't really looked into that, although
21 it's in the same line as with the imports on the grain or
22 vegetables or fruits. All I request is -- I don't mind
23 competing against organic farmers. What I'd mind competing
24 against is questionable validity of those imports.

25 BD. MEM. CALDWELL: Thank you very much.

1 CHAIR BRUCH: Stephen, thanks. Any other questions
2 for Stephen? Just a quick question, Stephen, you mentioned
3 compliance verification for high-risk products, particularly
4 imports are needed. Do you have ideas? We have testing, we're
5 having conversations on testing. Is that something that you'd
6 be supportive of or do you have other ideas there?

7 MR. BOYDA: I can tell you personally, and our
8 cooperatives are in full support of testing for both imports
9 and for beef. And domestic, it's not just imports that there's
10 some fraud issues and we need to address both.

11 CHAIR BRUCH: Excellent. Thank you, Stephen. I
12 appreciate your comments today and thanks for all your
13 leadership in our sector in keeping the family farm going.

14 MR. BOYDA: Thank you.

15 CHAIR BRUCH: Yes. All right, we have next, Kurt
16 Lensing followed by Megha Patel and then Ramani Narayan. Kurt,
17 go ahead.

18 MR. LENSING: Hi, Kurt Lensing with Lensing Farm. I
19 farm in central Minnesota. Our farm has been certified organic
20 for about 25 years. We have crops and cattle.

21 During that -- during part of my career, I did spend
22 10 years away from the farm and that was in agriculture finance
23 and then agriculture, grain trading, and logistics. So I do
24 understand kind of the logistics and I'll get into some of my
25 concerns and much of them have been echoed by some of the other

1 members here. But the majority of our crops are food crops for
2 human consumption, sweet corn, edible beans, peas, corn. And
3 then we do have some cattle too.

4 And up until this year, they were certified organic
5 and much like Stephen's comments, we haven't seen, at least
6 from what I see, the cattle certifying them, the time
7 associated with doing it and the premium is just not there. It
8 wasn't worth it for us anymore. So after 25 years of having
9 either certified organic dairy or beef cattle, we don't have
10 them anymore. So yeah, that would be a concern with the
11 imports on both the grains and the beef side.

12 We do raise a grass fed beef. So all of our cattle
13 are still getting certified organic feed. But really my
14 comments today are all going to revolve back to kind of one
15 thing. And I've heard some of these words used today,
16 integrity and transparency, but really integrity and
17 transparency of the organic labels at stake, consumer
18 confidence of the organic label and then a lot of confusion
19 with some of these added labels.

20 I think if we need -- if we're going to continue this
21 organic labeling, we need to have one label and we all need to
22 kind of group together and get on Board because it just creates
23 confusions.

24 On the imports, yes, testing, I would be in support
25 of that. I've had some issues with some GMO cross-pollination,

1 even though I'm delaying my planting two weeks, I'm having the
2 appropriate field buffers doing everything I can there. But
3 with imports, I'm getting every load tested every thousand
4 bushels. I can't imagine a cargo is taking a test every
5 thousand bushels. So leveling the playing field, if I'm going
6 to get tested and have my crops traced back to every field, I
7 think all importers should have to do the same when they're
8 selling it or when they're importing it, however that may
9 be. Because if you took all my tests and average them, they
10 would still be under the threshold.

11 But yeah, so I think labeling USA grown versus some
12 of the imported organic crops might add some clarity and some
13 transparency to the label as well.

14 CHAIR BRUCH: Kurt, thank you so much for your
15 contributions today. Any questions from the Board? Not seeing
16 anything, Kurt.

17 Can you talk about just your overall thoughts? Yeah,
18 I appreciate the comments on how we can keep working on
19 compliance verification here. If we really dive in and are
20 able to execute some of these items, I want to know just kind
21 of your overall thoughts on the program long-term. It seems
22 like you've been a part of it for a long time. So just kind of
23 general thoughts here.

24 MR. LENSING: General thoughts, yeah. I think the
25 Board's job should be to make sure we all have a level playing

1 field, whether that be tracing everything back, whether it's
2 whatever the product is, it doesn't matter. And just holding
3 what we're bringing in. Like I've heard, I think people should
4 have a level playing field. Competition is good. Imports are
5 what they are, but they should be held to the same standards.

6 CHAIR BRUCH: All right. Thank you for that,
7 Kurt. And best wishes in the farming season. All right, we're
8 going to move along to Megha Patel and then Ramani Narayan and
9 then Justin Bruch. Go ahead, Megha.

10 MS. ARSENAULT: Amy, we are not seeing Megha on the
11 line with us today.

12 CHAIR BRUCH: Okay, I'm going to highlight her and
13 we're going to try to catch up with these folks at the end of
14 the day. Ramani, are you available?

15 MR. NARAYAN: Oh, okay. I'm good.

16 CHAIR BRUCH: Wonderful. Ramani, before you start,
17 can you please state your name and affiliation?

18 MR. NARAYAN: Sure, and I have slides you're going to
19 put up, right? The professor always needs slides. Okay. My
20 name is Ramani Narayan. I'm on the Faculty of Chemical
21 Engineering and Material Science at Michigan State
22 University. I'm also the founding chair of the ASTM committee
23 that developed those standards which you see there, including
24 at the ISO level. So that's kind of a background.

25 I'll jump into the text itself. Want to point out,

1 there were two questions which were raised. The allowance of
2 compostable plastics in organic production, but more
3 interestingly, the question which you asked, whether resins and
4 formulated products meet those ASTM standards and align with
5 the tenets of organic production. And what I want to leave you
6 with is the science behind why these concepts are met. Can I
7 go to the next slide, please?

8 In order to understand this, you need to understand
9 what do you mean by compostable polymers? And simply, we are
10 asking the question, can microorganisms present in the compost
11 environment utilize the carbon as a food and fuel? Not to make
12 compost, but to eat food, just like we eat food in a practical
13 timeframe.

14 Can you go ahead and put all those things up
15 there? And this schematic, let's go to the whole slide
16 again. This schematic tells you that the requirement of the
17 standards is that the polymer carbon must be completely
18 utilized, assimilated by the microorganisms in a practical
19 timeframe of compost to generate CO₂ and cellular biomass. If
20 they don't meet it, then they will not pass the specification.

21 So what are we talking about here? We are saying
22 that polymer carbon, compostable polymer carbons will be
23 utilized as opposed to the standard traditional hydrocarbon
24 plastics which have carbon-carbon backbone. Can I go to the
25 next slide, please?

1 I have to tell you that this is all about chemistry,
2 right? I'm a chemical engineering professor, so chemistry has
3 got to be the backbone of anything I talk about. And I want
4 you to focus on the last polymer structure on the right-hand
5 side. You may not know what it looks like, but it certainly
6 looks to you like a chemical. That is compost. That is the
7 humic acid, fulvic acid, human materials, humans that are
8 formed during the compost process.

9 So compost formation, which you see there, is done
10 chemically by the reaction of cellular constituents, the amino
11 acids, proteins, and polypeptides, which you see reacting with
12 lignin structure. These are the -- what in compost terminology
13 you call the browns, the browns and greens. Without the
14 browns, you have no compost. Without lignin, you have no
15 compost.

16 So the reaction of the dead microbial constituents
17 with lignin gives you the humic acid humification. So where
18 does the compostable polymers or even the food polymers fit
19 in? They simply fuel and provide food for the microorganisms
20 to utilize carbon as a food source. So that is the
21 differentiation as to why compostable polymers would fit in
22 with what you are looking for, because it never enters into the
23 compost formation process.

24 I think I run out of time. So I'll let you ask
25 questions as you think.

1 CHAIR BRUCH: Yes, thank you so much for the class
2 that you provided us in three minutes. All right, Franklin, I
3 see your hand. Go ahead.

4 MR. QUARCOO: Can you hear me?

5 MR. NARAYAN: Yes, I can hear you.

6 MR. QUARCOO: Yes, so what you said, thanks for your
7 comment. It addresses one side of the coin. The other side of
8 the coin is the soil microorganisms. Will this become a
9 selection factor? That sort of, is there a fitness cost when
10 microorganisms now try to break down these synthetic
11 sources? Is it going to cause a change in diversity and the
12 function of various microorganisms?

13 So I think it's a two-sided coin and I'm hearing
14 about the chemical part and the breakdown part. What about the
15 fate of soil microorganisms and whether it will wipe some
16 populations out or what about that side?

17 MR. NARAYAN: So I'll answer to you in a single
18 sentence and you can follow up with me later. The microbes
19 that are being utilized, utilizing polymer carbon is the
20 standard compost microbes. It does -- obviously, the design of
21 the compostable polymer is similar to carbohydrate polymers.
22 If you're familiar with carbohydrate polymers, which is in food
23 and proteins and all of polypeptides and all, they're very
24 similar to that. So the breakdown and assimilation pathway to
25 give you the humic acid is identical and isotopically labeling

1 these compostable polymers with C13 and C14 has shown that,
2 yes, it enters the microbial constituents, the amino acids,
3 protein, and yes, it is used as a fuel to generate energy for
4 its life process. Short answer.

5 MR. QUARCOO: Am I allowed to follow up or I can come
6 back in?

7 CHAIR BRUCH: Yes, no problem, Franklin. You can do
8 a follow up.

9 MR. QUARCOO: Okay, so when you are making the
10 compost, that's not what I'm talking about. When you take the
11 compost and it's being used, what is the effect on soil
12 microorganisms? So I see -- so if we are trying to do this,
13 then we have to see the effect when it's actually used.

14 MR. NARAYAN: So your point is that, is there going
15 to be a special selection of microbes because of these
16 compostable polymers? Remember, the food waste is going to be
17 present at 90 percent plus in that system. So there is enough
18 microbes which will be utilizing it. The same microbes are
19 capable of using this. They all break down to organic acids or
20 small molecules, which then go inside the cell for microbial
21 metabolism. I'm happy to discuss with you. They are great
22 questions. Love to answer.

23 MR. QUARCOO: I'll contact you. I still have
24 questions, but I'll leave it at that.

25 MR. NARAYAN: Thank you.

1 CHAIR BRUCH: Okay, thank you, Franklin. And if
2 there's anything that is exchanged there, please let's make
3 sure it gets on the transcript. That would be wonderful.
4 Thank you. And I mean, with the written comment, doc.

5 Allison, go ahead.

6 MR. NARAYAN: You're unmuted, I think. Allison?

7 VICE CHAIR JOHNSON: I didn't put my microphone
8 down. Thank you for being here, professor. We've gotten a lot
9 of comments from people who are concerned, sort of concerned
10 about the unknown or view these polymers as having essentially
11 equivalent impacts on the environment as microplastics. And
12 I'm curious from your perspective, the small portion that
13 wouldn't break down, are those materials equivalent to a
14 plastic substance? And if not, how would you characterize
15 those kind of leftover materials?

16 MR. NARAYAN: So the -- it's a great question because
17 this is sort of the big question mark now being raised on
18 this. What I am saying is this differentiates it from those
19 carbon-carbon backbone polymers, those hydrocarbon plastics,
20 polyethylene, polypropylene. They break down, they fragment,
21 but microbes are not capable of utilizing that. Whereas in
22 this case, when this breaks down, it is utilized completely and
23 should not result in any persistent or accumulating
24 plastics. That is data. You saw that 90 percent plus polymer
25 carbon. So it is a rate issue.

1 So maybe the composters are doing it in a timeframe
2 that all of it is not completely removed. It will be removed.
3 And this is something which more data needs to be provided, but
4 there's sufficient data now using, and I don't know if Amy will
5 allow me to put my radiocarbon slide up. It is the third
6 slide, fourth slide, because this is a very good question which
7 has been asked and I want to make sure the committee is aware
8 of it. One, two, three, four, five, slide five.

9 CHAIR BRUCH: Is that possible, Andrea, slide five
10 real quick? We'll just see if we can highlight it.

11 MR. NARAYAN: Yeah, can we put that up?

12 CHAIR BRUCH: Okay, it's coming and then, yeah.

13 MR. NARAYAN: Perfect. So if you look at this slide,
14 what it is saying is that we have done work to label that
15 aromatic carbon, the most recalcitrant carbon with carbon-14,
16 and then simply track that carbon through the composting
17 process. So the green stuff you see is carbon present in the
18 polymer. And as you move from left to right, 180 days, you see
19 most of that 90 percent plus has gone into CO₂. Some of it has
20 gone into biomass. The mass balance is not complete. You have
21 a few percent unaccounted for.

22 But what I wanted to convey to you is that both this
23 data, and there's a UTH Zurich study which shows labeling C13,
24 that these polymer carbons do go into the microbial
25 constituents and then is used as food and fuel for the life

1 process. I don't think you have such data for any even known
2 polymer going through the process. But these are all recent
3 developments and there should be no persistence or accumulation
4 of the polymer. That doesn't mean that you dump it in there
5 and it will magically disappear over in one day or two
6 days. It is going to take its time, but the data shows that it
7 will not accumulate.

8 And the last point here for this team to consider is,
9 what is the alternate? If you're not going to be able to
10 advocate or start this process, you're going to be left with
11 carbon-carbon polymers. They will get into the compost
12 stream. They will form microplastics and I don't care how much
13 screening which is done, there's always going to be fragments
14 which we are finding out today, will go into the compost soil.
15 And you are going to therefore contaminate soil.

16 So the trend to moving towards utilizing products
17 that will meet and be compliant with composting and organic
18 farming as you have so rightly elaborated, must be the way is
19 biodegradable compostable, but complete and verified by
20 standards. That's how you have to move towards a more advanced
21 form where organic composting is clean and not polluted with
22 micro or nanoparticles in it.

23 CHAIR BRUCH: I really apologize to jump in
24 here. I'm trying to be as judicious as I can. Thank you so
25 much for that exchange. And hopefully we can add on to your

1 written comments that you'll submit to us too. Professor,
2 thank you so much. We are going to move on to Justin Brook and
3 then Conrad Miller and Russell Taylor. Do we have Justin?

4 MS. ARSENAULT: Hey, Justin's not on the line with
5 us. He's on a delayed flight and really wants to comment and
6 is going to try as soon as he lands. So let's keep moving.

7 CHAIR BRUCH: Yep, thank you, Michelle. I will
8 highlight, oh, yep.

9 MS. ARSENAULT: Also Conrad is not with us on the
10 line.

11 CHAIR BRUCH: All right. I will make note. Do we
12 have Russell Taylor?

13 MR. TAYLOR: Yes, I'm here.

14 CHAIR BRUCH: We're going to do Russell Taylor, Amy
15 Van Saun and Rafaella Mazza. And I believe Amy is not
16 available either. Michelle, is that correct?

17 MS. ARSENAULT: Correct, Amy had to cancel. She had
18 a family emergency and Rafaella Mazza also canceled earlier,
19 so.

20 CHAIR BRUCH: All right. Okay, Russell, we're going
21 to go to you next and then Theo Crisantes and Mark Lipson. So
22 Russell, please state name and affiliation. Thanks for being
23 here.

24 MR. TAYLOR: Thank you for having me. My name is
25 Russell Taylor. I'm an organic beef producer and president of

1 the Humic Product Trade Association. I am also the manager of
2 the ISO 19822 method for testing for humic and folic acids.

3 I'm here today at the direction of USDA Quality
4 Assurance Division to resolve our complaint of guidance misuse
5 by material review organizations, which results in consumers
6 receiving adulterated or mislabeled products. The QAD advised
7 us to bring this issue to the NOSB as they could not resolve
8 our complaint without further clarification.

9 OMRI is relying on a statement in the guidance memo
10 5034-1 that states, this table is not exhaustive. There may be
11 non-synthetic natural materials which are not included in the
12 guidance, but which meet the requirements for use in organic
13 production and handling. This has been interpreted to allow
14 any synthetic or natural material to be labeled as folic acid,
15 regardless of its source.

16 This approach ignores all scientifically recognized
17 definitions of fulvic acid and allows products like
18 lignosulfonates, corn steep liquor, and fresh plant extracts to
19 be sold as fulvic acid. While this broad interpretation of
20 guidance could affect other high value organic inputs, it is
21 currently focused on fulvic acid. All fulvic acids are created
22 through a degradation process known as humification, which was
23 described well in the 2012 USDA Technical Evaluation Report on
24 Humic Substances.

25 Through degradation and polymerization, organic

1 matters converted into stable organic acids that differ from
2 their parent material. Imagine if an MRO claimed that plants
3 naturally contained compost. Now, we all recognize this
4 statement as absurd. The input cannot be conflated as the
5 output. And doing so overlooks the transformative process of
6 composting. Yet, this is precisely what is happening with
7 fulvic acid, where OMRI is incorrectly recognizing non-humified
8 plant materials as fulvic acid.

9 Humic substances are complex macromolecules making
10 rapid identification difficult. A fulvic acid is measured
11 using a selective resin that finds a specific range of
12 molecular sizes. Unfortunately, this resin test is non-
13 qualitative and can capture substances of similar size that are
14 not fulvic acid. The resin manufacturer lists alternative uses
15 for this resin to capture paper pulp, mill waste, alcohol,
16 surfactants, and even pesticides like malathion. This means
17 that all synthetic and natural molecules that fit within the
18 same size range can be incorrectly identified as fulvic acid.

19 So passing this test does not discern paper pulp from
20 fulvic acid, as they're both captured and measured. This
21 quantitative measure is being used as the basis for
22 miscategorization, even though other qualitative measures such
23 as FTIR, NMR, or UV-Vis can read the molecular fingerprints and
24 quickly reveal that these plant extracts and synthetic
25 compounds are not fulvic acid. Ignoring those qualitative

1 measures allows for inexpensive ingredients to be sold as
2 fulvic acid.

3 Our request is simple. The humic industry needs a
4 comment or annotation to resolve the disclaimer being
5 incorrectly applied to humic substances. The NOSB Board must
6 clarify that fulvic acids are only derived from humic
7 substances as the guidance indicate.

8 CHAIR BRUCH: Thank you, Russell. Really appreciate
9 your comments here. I want to open it up to the Board for any
10 questions. I see one from Nate Lewis. Go ahead, Nate.

11 SECRETARY LEWIS: I guess my question is this an
12 organic specific question or is it simply because fulvic acids
13 are a -- the market for fulvic acids isn't organic? I'm just
14 thinking about like, is there an, I don't see an AFCO
15 definition for fulvic acid. So is it a soil amendment for all
16 producers issue or is it an organic industry specific issue
17 that we're dealing with?

18 MR. TAYLOR: Yeah, so the AFCO -- there is an AFCO
19 definition for it and I can pull up the definition if you need
20 it right here. The underlying issue is many states do not
21 regulate fulvic acid. So they're not checking the labels, not
22 checking the derived from. There is really no parent in the
23 room. So whatever the manufacturer states on the label is
24 considered fulvic acid.

25 And I put this in the comments already and you can

1 read them, but I would encourage you to look at that. But
2 basically what they're saying is anything that passes the test
3 is fulvic acid and don't question where it comes from. And so
4 certain things like paper pulping from the mill has not gone
5 through any of the fumification process, but it's still being
6 marketed as fulvic acid. So you're having something that is
7 produced at pennies on the pound that actually is competing
8 against something that's very expensive to produce.

9 So there needs to be a parent in the room and it's
10 coming down to how the NOSB and OMRI is interpreting the
11 definition of fulvic acid. There is a definition of both humic
12 substances and fulvic acid in the NOP, or sorry, the AFCO-OP,
13 which we wish would be followed more closely by the NOSB. But
14 presently, yeah, there's a whole host of products that aren't
15 humified that are being conflated as fulvic acid.

16 CHAIR BRUCH: Nate, are there any other questions for
17 Russell? Russell, thank you for coming here today and
18 detailing this also in the written comments. We will continue
19 on our conversation here.

20 MR. TAYLOR: Thank you.

21 CHAIR BRUCH: Yes. We're going to go to Theo
22 Crisantes and then Mark Lipson, and then we're going to begin
23 our sweep at the top of the list for those that we missed. So
24 please go ahead, Theo.

25 MS. ARSENAULT: Amy, I'm not seeing Theo on the line

1 with us today.

2 CHAIR BRUCH: We will try to catch up with Theo here
3 shortly. We have Mark Lipson, and then I'm just going to call
4 some of those additional names that we're coming back around to
5 at this moment. We have Andrew Senior Smith, Stefan Baimbill
6 Johnson, and Nate Powell Palm. We also have Anne Stoner, Artie
7 McKim, Megha Patel, Justin Bruch, and Conrad Miller. So we
8 will try to catch up with you guys here shortly, but Mark
9 Lipson, go ahead and state your name and affiliation.

10 MR. LIPSON: Thank you, Amy. I'm Mark Lipson, coming
11 to you from Molino Creek Farm, Davenport, California. I'm also
12 an affiliate with the University of California Santa Cruz
13 Center for Agroecology. I have a consultancy that's part of
14 Wolf and Associates, and I was the USDA Organic Policy Advisor
15 from 2010 to 2014.

16 I want to note as a point of interest that I don't
17 think we've ever had a situation before where the comment
18 period closes after the oral comments, and of course, right up
19 against the meeting itself. So that's a big challenge for you
20 all, and you'll have to do your best, but we're going to see
21 that things are going to slow down a great deal in terms of
22 rulemaking and being able to advance things through the USDA
23 system. It's probably an understatement, but it may give the
24 Board a chance to take their time to work out some of the
25 things that it has on its plate and deal with the backup on

1 comments.

2 I do want to address a couple of specific things, but
3 also generally state that diversity, equity, inclusion,
4 representation should not disappear from the Board's activity
5 or work plan. Representation has been really a notable feature
6 of this Board for many years, and that matters.

7 Onto the specifics, the risk-based certification or
8 risk-based approach, as Ellie from ACA very particularly framed
9 it, is a good start. It seems pretty clear it's not fully
10 ready to hatch that egg, and we'll be getting more comments in
11 on the specifics, but to that point, it is confusing that the
12 written document refers to the text as a summary of the
13 proposal, so it's not clear if it is actually the proposal
14 itself or what else might be included in that.

15 The ACA scorecard kinds of things that are referenced
16 are not part of the public record, so that's another problem
17 with it. But sorting out the consensus and technical framework
18 on a more flexible risk-based certification system is an
19 important goal, so keep pursuing it. And especially to the new
20 members, you shouldn't feel rushed to have to think that you
21 have to have this figured out. Wow, that's it already.

22 One more very important thing is that the regular --

23 CHAIR BRUCH: You can finish your -- I'm sorry, Mark,
24 we'll have you finish your last sentence. I'm just trying to
25 be standardized here.

1 MR. LIPSON: Understood. We're ahead of time, so
2 maybe we'll get some extra questions. The regulatory review of
3 residue testing, I've tried to say this for a few of the last
4 meetings, that kind of review should absolutely include 265.670
5 subsection F, paragraph small F, which states that the results
6 of residue testing shall be publicly accessible. As far as I
7 know, there's no guidance on that. As far as I know, there's
8 no legal action pertaining to that, but there pretty easily
9 could be. And in the context of the residue testing
10 legislation that's being proposed and everything else you're
11 working on, it'd be better to get ahead of that rather than
12 have it the way that that goes be dictated by circumstances.

13 CHAIR BRUCH: Okay, thank you, Mark, for concluding
14 your comment there. I apologize again for the interruption,
15 sir.

16 I'm going to open it up real quickly to Board
17 questions or comments to Mark to unpackage anything that we
18 heard here. Mark, I'm not seeing anything.

19 I did take note of, and I apologize, it was something
20 that you said in your last sentence. It was what, 265.670(f),
21 is that right? Did I write it down correctly? Okay, I
22 appreciate the comment there. We'll do some background
23 gathering.

24 Any other questions for Mark? All right, thanks for
25 your service to our community. Really appreciate your time

1 here. And Mark has noted we are a little bit ahead of
2 schedule, but we have several commenters that were skipped on
3 the front end of the programming here. So I'm going to see if
4 we have any of those voices online.

5 We have Andrew Smith. Michelle, do you see Andrew
6 Smith?

7 MS. ARSENAULT: We are not seeing Andrew Smith.

8 CHAIR BRUCH: All right, we have Stefan Baimbill
9 Johnson.

10 MS. ARSENAULT: I'm not seeing Stefan.

11 CHAIR BRUCH: Okay. Do we have Nate Powell Palm?

12 MR. POWELL-PALM: Sure do.

13 CHAIR BRUCH: All right, Nate, please state your name
14 and affiliation. Thank you for joining us.

15 MR. POWELL-PALM: Hello, Madam Chair and members of
16 the Board. My name's Nate Powell-Palm, and I'm a certified
17 organic farmer based in Bozeman, Montana.

18 Boy, there's been a lot of change in the past few
19 months. I was heartened when Deputy Administrator Purdy
20 reminded us recently that the only constant is change. As we
21 navigate this change, however, I just need us all to pause for
22 a minute here and take stock of where we are today. Organic is
23 a \$70 billion industry that's created by an NOP budget of \$23
24 million. Several farmers this comment period have mentioned
25 ROI and how organic provides a good ROI for producers. But

1 gosh dang does the NOP provide a great ROI for the American
2 taxpayer.

3 New farmers are accessing the organic market thanks
4 to the Transitioning to Organic Partnership Program, or TOPP.
5 More value is being added to organic crops through the Organic
6 Market Development Grant. Now, I know I might be preaching to
7 this crowd, so I want to highlight a few new changes that
8 caught my attention.

9 This past spring, I was visiting an older family
10 member who is a solid Fox News watcher. And as I'm sitting
11 there peeling an organic orange, he said, did you know that
12 there's some stuff in our food that shouldn't be there, like
13 synthetic dyes? It's crazy. You really might be onto
14 something with this whole organic thing, Nate.

15 Now for context, this is the relative who will drive
16 across town when a 12-pack of Diet Coke is 25 cents
17 cheaper. As more folks from across the country begin to
18 understand that food and health are inextricably intertwined, I
19 sit and wonder at how, through the organic certification
20 process, we have built a healthy food system that's oven-ready
21 to make America healthy again.

22 But I also feel that during times of change, we need
23 to hone in on what we can do as individuals, ourselves, to help
24 further this change. Many industry professionals, including
25 farmers and food companies, have shared with the NOSB over the

1 years that with the growth and success of the industry, the
2 organic certification sector needs a human capital to oversee
3 the newly organic and transitioning operations. Likewise, many
4 organic certifiers have cited human capital as a critical pinch
5 point in their capacity to maximize oversight and ensure
6 integrity.

7 As I look around for how we easily and quickly
8 address this issue, I've been heartened to look at the work of
9 the International Organic Inspectors Association, or IOIA.
10 Last year alone, IOIA trained 697 students in over 48
11 courses. That's a lot of folks learning about organic. But we
12 need more. We need more courses. We need more advanced
13 training. We need more folks working hand in glove to support
14 IOIA getting new students trained.

15 As a means of doing my small part, as a little old
16 farmer in Montana, I encourage everyone to join up in
17 supporting IOIA's mission to get enough boots on the ground to
18 keep organic thriving. And now to close out, I want to say I'm
19 grateful for you all. I miss you all. And I'm especially
20 grateful for the five new members, Andrea, Amanda, Corey,
21 Kathryn, and Kat. So thank you.

22 CHAIR BRUCH: All right. Thank you, Nate. Really
23 appreciate that. Brian, go ahead. I see your hand up.

24 BD. MEM. CALDWELL: Thank you, Nate. Great to see
25 you. With your wide experience as an inspector, as well as

1 sort of an activist farmer and a farmer, can you tell us about
2 how -- I'm going to ask a very specific livestock
3 question. How widely used and important are butorphanol and
4 poloxalene? We had some questions about the need for these.

5 MR. POWELL-PALM: Yeah. I might've given you a
6 little bit of a different answer before I started working with
7 a lot of transitioning producers to help them access organic
8 certification. And as I look at the ability for folks to feel
9 like they have enough tools in the toolbox to readily address
10 all of their health needs, I see the essentiality as being able
11 to not necessarily be ready to treat an entire herd, but be
12 ready to treat those few animals that when a mistake is made,
13 an animal's put out to pasture, bloat is incurred, we're ready
14 to address it really quickly. And it doesn't put new
15 transition producers on their back foot about how hard organic
16 is. And so while its use is somewhat limited, I do see it as
17 an essential tool in the toolbox, especially for folks just
18 getting into organic, which we want to encourage.

19 CHAIR BRUCH: Thank you, Brian. Appreciate that
20 question. Any other questions from the Board?

21 Nate, I have a quick one. Well, it's going to be a
22 quick question and we'll try to maintain a quick answer here,
23 but I kind of gleaned from some of your comments here, your
24 enthusiasm. I just want to know, you know, future
25 outlook. There's a lot of challenges we've heard, but what is

1 your future outlook? Are we bullish or bearish in our organic
2 sector for the future? And then what steps do we need to take
3 to get there?

4 MR. POWELL-PALM: If I were to use my grandpa as the
5 example of why I am unabashedly bullish, I would say that we
6 are starting to cross this communication divide where so many
7 more people are interested in organic and understanding why
8 organic isn't just a thing for hippies or a thing for rich
9 people. It's a thing that is literally medicine to make it so
10 you lower your diabetes medication or lower your reliance on
11 expensive drugs.

12 This is the sort of consumer marketplace growth that
13 I have been hoping to see for the past five years. And we're
14 starting to see that, and I think we just need to keep up with
15 it. We need to keep organic at the forefront. We need to be
16 articulating why food as medicine is really -- it's
17 foundationally organic food as medicine, that we have
18 eliminated all of those things that are compromising or
19 exacerbating the toxicity levels in our eaters, our people.

20 So I think there's going to be huge market
21 opportunity, and I'm really excited for this tent to get so
22 much bigger. No matter how people come to organic, folks are
23 looking to us as a solution, and I'm ready to grow some food
24 for them.

25 CHAIR BRUCH: Thanks, Nate. I see two hands

1 here. We got Logan and then Kathryn. Go ahead. Sorry, go
2 ahead, Logan. Oops.

3 BD. MEM. PETREY: Hi, thank you. Sorry. Okay, I'm
4 working now.

5 Hey, Nate, good to see you. So it's interesting, you
6 know, getting into maybe different demographics for the
7 marketing side. We also had somebody on that made a
8 comment about a symposium or conference he went to and said
9 that Gen Z's interested, but their attention span's about eight
10 seconds long, and so it's interesting, you know, on the
11 marketing side that it may be very different for these types of
12 people, and it may be -- I wonder if kind of the same marketing
13 side would grab both of them, or do you think that that may
14 kind of differentiate there?

15 MR. POWELL-PALM: That's a good question. I think
16 that the -- I think we can do both. I think we have long-form
17 storytelling in a way that meets maybe an older demographic
18 who's just sort of waking up to this idea, and we have a lot of
19 ways of doing that, but I do think, you know, we need to act
20 fast.

21 If there's a chance that Gen Z is going to be
22 interested in organic food, if it's just through TikTok, I will
23 get TikTok just like I had to re-get Facebook to meet all the
24 older farmers, and I never thought I'd have to get either
25 again, but here I am, active on social media, and I think

1 that's what we're looking at. But to kind of, I think that
2 they're necessarily, their concerns are a little bit
3 different, and I think we need to massage our own messaging to
4 really address those concerns of all of our different
5 demographics. I don't think we'll have one message that works
6 for everybody, and I think that is an opportunity for all of us
7 storytellers who are out there trying to get the word about
8 organic out.

9 CHAIR BRUCH: Okay, thanks, Logan, for the
10 question. Moving on to Kathryn. Go ahead.

11 BD. MEM. DESCHENES: Sure. Nate, my question's about
12 MAHA. So you mentioned MAHA and the interest, the new interest
13 in more healthy food.

14 I will say, as a company both producing organic foods
15 and conventional, our organic array is much less affected by
16 state bills that are going on right now. And how do we move
17 the conversation in MAHA from these food additives, general
18 things, to focus more on organic?

19 MR. POWELL-PALM: Great question. I have been
20 sitting there ready to do a weekend update where a news story
21 flashes saying we banned eight synthetic dyes. I'm like, girl,
22 we already did that in organic 30 years ago. We're ready. And
23 I think there's a certain piece where folks are saying, okay, I
24 realize there's problems in certain ingredients, and we need to
25 be saying we are ready for you. Look this way, we've already

1 fixed all of it. It'll be possibly years, decades before we
2 get everything fixed. And I would say everything being fixed
3 is just everything being organic.

4 And so we have to be pointing everyone who even
5 questions whether or not there's some less than ideal
6 ingredients in a lot of foods, especially ultra-processed
7 foods, and say, if you want to avoid all those, you have to
8 just go buy organic, and we are ready for you. We've got the
9 scale. We've got the price point. We're ready to bring all
10 those consumers in. But I'd love to talk more about this.

11 BD. MEM. DESCHENES: Yeah, we'll look at you as the
12 first spokesperson.

13 MR. POWELL-PALM: All right.

14 BD. MEM. DESCHENES: Thank you.

15 CHAIR BRUCH: All right. Well, thank you. Appreciate
16 your contributions here, Nate. Good luck with the farming
17 season.

18 MR. POWELL-PALM: Thank you, madam.

19 CHAIR BRUCH: Okay, we have a few more names to
20 call. Is Anne Stoner on the list? Or on the, sorry, on the
21 phone. Do we have Anne?

22 MS. STONER: Yes.

23 CHAIR BRUCH: Excellent. Glad to catch up with
24 you. Please state your name and affiliation.

25 MS. STONER: Hi. Thank you, Amy and members of the

1 Board. My name is Anne Stoner. I'm the owner-operator of
2 Feeder Creek Farms. I'm small vegetable, egg, and flour
3 operation in transition to organic.

4 I'd like to address three topics today very briefly.
5 Why unfreezing OMDGE funding is essential to make Montana farms
6 more competitive. Secondly, compost parameters and the organic
7 certification. And thirdly, the importance of transition to
8 organic partnership programs for new and transitioning farmers.

9 Firstly, I'd like to highlight how the Organic Market
10 Development Grant, OMDG, has impacted my operation. There has
11 been no commercially viable certified organic chicken feed
12 accessible in or near our community. The OMDG grant awarded to
13 Nate with Cold Springs Organics in Belgrade, Montana will
14 enable certified organic livestock production to become
15 profitable across our region by being able to feed affordable
16 locally grown and milled organic feed.

17 Without access to this local supply, it's not
18 economically viable for operations at my size and in my
19 location to be able to feed organic to our livestock. And the
20 funding freeze has thrown our operations, the nutrition of our
21 animals, and the quality of the product that we can provide our
22 community into question.

23 Our community of farmers and ranchers and our super
24 valuable consumer community are counting on the OMD grant
25 funding to be unfrozen for cold spring organic. Secondly,

1 compost. We are eager to continue utilizing the services of
2 our local composter who spoke earlier, Ryan from Happy Trash
3 Can Compost, who diverts a substantial amount of our local
4 community food waste from landfills and turns it into compost,
5 which subsequently allows us to build soil with a locally made
6 product.

7 We understand that there's a balance to strike here
8 and that we absolutely don't want organic certification to lose
9 any credibility. If it turns out that compostable plastics
10 pose a greater risk for pollution than we currently understand,
11 a sensible compromise is what we're hoping for, that would
12 maximize food saved from the landfill for compost while also
13 minimizing bioplastic waste on organic farmland. It makes
14 sense to carve out essential allowances for things like fruit
15 stickers, compostable bags that transport our food. Our
16 community is truly striving to minimize the use of single use
17 plastics, which moves us towards compostables.

18 I'd like to add my voice to support the current
19 proposal that we need the NOSB to review all the materials used
20 in organic production and potentially allow compostables to be
21 used in certified organic compost.

22 Finally, transitioning to Organic Partnership
23 Program, TOPP, my ability to become certified with the
24 technical assistance through TOPP program has been an essential
25 hand up as I work to both feed my community, build my business

1 and honor the high level growing practices that I was already
2 using and that have met organic standards. I hope to see this
3 program continued so that I and other farmers can receive
4 assistance to organic certification. Thank you so much.

5 CHAIR BRUCH: Thanks for your comments today, Anne,
6 and finishing up that last sentence so quickly. I'm going to
7 open it up to the Board for any questions there on the topics
8 you discussed or anything else.

9 Anne, I'm not seeing anything. Thank you again. I'm
10 glad we were able to catch up with you. All right, moving on
11 to our list. We have, I believe, Artie McKim. Is Artie McKim
12 with us?

13 MS. ARSENAULT: Artie is on the phone and he might be
14 on mute.

15 CHAIR BRUCH: Excellent. I'm glad we could catch up
16 with Artie. When you're on, Artie, please state your name and
17 affiliation.

18 MS. ARSENAULT: Artie, it looks like your phone is
19 unmuted. If you're having trouble, try star six. Oh, now it's
20 muted. It's unmuted, but if you're talking, we can't hear you.

21 CHAIR BRUCH: Maybe we'll call on another missing
22 person from the original round, and then, Artie, we'll try to
23 circle back up with you. I think there'll still be some time,
24 give you a little bit more time to sort out your technical
25 delay there.

1 Is Megha Patel available? Megha?

2 MS. ARSENAULT: Not seeing Megha on the line.

3 CHAIR BRUCH: Okay. All right, moving on. Next
4 person, Justin Bruch. Are you available?

5 MR. BRUCH: Yes.

6 CHAIR BRUCH: All right, Justin, great. Thanks for
7 joining us. Can you state your name and affiliation?

8 MR. BRUCH: Yes, my name is Justin Bruch. I'm the
9 founder and CEO of Clear Frontier Ag Management, as well as
10 J. Bruch Farms.

11 CHAIR BRUCH: Justin, I'm not having the best
12 connection with you, I don't think. It's a little better.

13 MR. BRUCH: All right, I'm sorry, I'm in an airport,
14 so I'll see if this, hopefully you can hear me.

15 CHAIR BRUCH: That's better.

16 MR. BRUCH: Okay, perfect. I'm going to take this
17 off video so you guys don't see a closeup of my face. Okay,
18 yeah, thank you for the opportunity and thanks for the chance
19 to talk quick to the group. So I'm an organic farmer from
20 Northwest Iowa. I also run a farmland fund where we buy
21 farmland focused on transitioning it to certified organic. And
22 we've done a significant amount of that over the last number of
23 years.

24 I am very frustrated with the organic industry around
25 the organic import frauds when I look at the numbers of corn

1 and soybeans coming in from an import basis. As a country,
2 when we're growing 180 million acres of corn and soybeans and
3 several million acres for organic, and yet we're importing
4 organic corn and soybeans from foreign countries that are not
5 following the same rules as us, it's unfair to the American
6 farmer and it was absolutely unfair to the American consumers.

7 I spent seven years of my life farming in Ukraine
8 where I farmed 135,000 acres conventionally. In Ukraine, I
9 spent a significant amount of time in Russia and a significant
10 amount of time in West Africa. In all of those days and all of
11 that time, I never saw one single organic farm, nor could I
12 hardly ever find any manure in Ukraine and very little in
13 Russia in the big farming areas. And yet somehow, we
14 magnificently find our ability to get imported grains from
15 those countries that are flowing in and competing against
16 American farmers, which I will just go on the record and state
17 is just not accurate from personal experience. So that is a
18 frustration of mine that I hope we can continue to make
19 progress going forward.

20 It is unfortunate, but in those parts of the world, a
21 small amount of dollars will go an extremely long ways of
22 getting what you want done. And unfortunately, that is the way
23 the world works in that part of the world. And consequently,
24 it's pretty easy to end up with paperwork when money can sort
25 those things out.

1 And so from someone who spent about one-fifth of my
2 life there farming and know it from both sides, I find great
3 frustration with what's going on here currently and how it's
4 affecting the organic industry and the organic farmers. So I
5 would love to see more of that progress change and happen
6 because I can just speak some firsthand results that what we're
7 seeing today coming in is not accurate by my own accord. Those
8 would be my comments and I appreciate the opportunity to make
9 them.

10 CHAIR BRUCH: Thank you, Justin. I'm going to open
11 it up to the Board for any questions or comments. Justin, I'm
12 not seeing any other questions. Thank you so much for your
13 contributions here. I am going to keep moving on our list
14 here. Do we have Conrad Miller?

15 MS. ARSENAULT: We are not seeing Conrad on the line
16 with us. Oh, wait, he is on the line with us.

17 CHAIR BRUCH: Excellent. Glad we could catch up with
18 you, Conrad. Can you please state your name and affiliation?

19 MS. ARSENAULT: His mic is unmuted. Dr. Miller, if
20 you're talking, we can't hear you.

21 HAIR BRUCH: Michelle, thanks for correcting
22 me. Apologize. Dr. Miller, okay, we can see you. Do you want
23 to test your mic?

24 DR. MILLER: Can you hear me?

25 CHAIR BRUCH: We got you, Dr. Miller. Go ahead.

1 DR. MILLER: Oh, okay. I just was in Atlanta. I had
2 a drive up here in an hour and a half.

3 Well, I'm a concerned citizen, an organic advocate,
4 an organic activist. I've written a book where I had about 200
5 pages on food, GMOs, aquaculture, et cetera. I'm also a
6 physician and a surfer and a poet. And I looked at everybody's
7 little bio and it's very impressive of the people on the
8 Board.

9 My main concern at this point is that we are allowing
10 synthetic agents to be called organic when this is supposed to
11 be the National Organic Standards Board, but I don't know if
12 it's supposed to be the National Organic Marketing Board. I
13 know people don't want to have their fruits and vegetables age
14 quickly, but shelf life, I don't know if that's more important
15 than the standards and the integrity of organic food.

16 For example, one example is apeel. I'm very
17 concerned about apeel. That's been approved to be used on
18 fruits and vegetables, but it comes from, first of all, it's a
19 fungicide. It's registered as a fungicide with the EPA. And
20 fungicides, herbicides, and pesticides are supposed to not be
21 allowed in organic food. And so that's apeel.

22 And now they want to use that apeel all over the
23 world. They just hired a couple of people from Monsanto Bay to
24 facilitate that. And the other question I have about it is,
25 how is it approved to be organic when only 0.66 percent of the

1 product was divulged, which is supposed to be citric acid, and
2 the other 99.3 percent were called proprietary? In other
3 words, they wouldn't be divulged. So that's perplexing. So
4 that's just one example.

5 There are others, maltodextrin, carrageenan, where
6 they make these things with very toxic processing agents like
7 heptane and ethyl acetate. Those are for the mono and
8 disaccharides that they make the apple with. And then those
9 things are allowed to have 23,000 parts per million of both of
10 those somehow.

11 So I just want to say that I think we should protect
12 organic standards and don't pervert them. Okay, that's good.

13 CHAIR BRUCH: All right, Dr. Miller.

14 DR. MILLER: Thank you.

15 CHAIR BRUCH: Thanks for your comments there. I'm
16 going to open it to the Board for any questions to Dr. Miller
17 here.

18 DR. MILLER: Yeah, okay. Here I am. Okay, I'm all
19 ears. Well, almost all ears.

20 CHAIR BRUCH: Yeah, Dr. Miller, I am not seeing any
21 questions for you today, sir, but thank you so much for your
22 technical comments. We will process those. Did you have a
23 chance to submit any written comments? I wanted to plug that
24 our written comment back is still open, so if there's more
25 you'd like to add, please use that.

1 DR. MILLER: Yeah, I think I'll make one. I did one
2 last October, and I'll put one in, and I'm going to put in a
3 little video link to this brilliant young man named Matthew
4 who's with My Health Forward, and he gives all these things I
5 said and much more in a minute and 53 seconds, and he's great,
6 so I'm going to put that in a written comment, a link. You can
7 check that out on that, and he has some other things too.

8 CHAIR BRUCH: Excellent, thank you. We really
9 appreciate that.

10 DR. MILLER: Okay.

11 CHAIR BRUCH: Have a wonderful day, and thanks for
12 joining us.

13 DR. MILLER: My pleasure.

14 CHAIR BRUCH: All right, we have a few more names to
15 call to see if we can catch up with these folks. We have Theo
16 Crisantes. Is Theo on the line?

17 MS. ARSENAULT: I don't see Theo on the line with
18 us. Nope. I'm going to check there.

19 CHAIR BRUCH: Okay, thank you. One more name we were
20 going to circle back up to that we believe had technical
21 difficulties, Artie McKim. Do we have Artie?

22 MR. MCKIM: Yes, good afternoon. Can you hear me?

23 CHAIR BRUCH: Yes. Thank you. Please state -- yeah,
24 wonderful. Please state your name and affiliation, and Artie,
25 I believe you are the last speaker we are going to be listening

1 to today.

2 MR. MCKIM: Oh, well, thank you so much, Amy, and the
3 Board. I am Artie McKim. I am the Vice President of
4 Technology of GCHEM, a chemical manufacturer in the U.S., and
5 today I want to discuss how updating the National Organic
6 Program's rules for inert ingredients can create a clearer
7 future for organic farming, and in order to select organic
8 certified inputs responsibly and efficiently, farmers,
9 consumers, crop protection businesses, we believe, need a newly
10 modernized framework.

11 As things stand today, the national list of allowed
12 and prohibited substances is almost 20 years old, and since its
13 last major overhaul in 2005, science, farming practices, public
14 expectations have moved on considerably, and we believe that
15 crop protection companies need a clear understanding of which
16 ingredients have recognized status as organic ingredients, and
17 consumers as well, increasingly, want an organic label that
18 purely reflects environmental and risks to human health.

19 But companies today, certifiers such as OMRI and
20 USDA, all struggle with the patchwork about data listing, and
21 we believe long petition queues. We're afraid that the
22 ultimate result is that this will stall innovation, and the
23 growers won't always be able to have access to the best low-
24 impact tools.

25 On the 24th of October in 2024, the National Organic

1 Standards Board provided a formal recommendation to the
2 National Organic Program on the subject of inert ingredients in
3 organic pesticide products, and at that time, NSOB (sic)
4 recommended that NOP move ahead with formal rulemaking and
5 provided several options.

6 One of them was to continue, more or less, in the
7 current fashion, using kind of an item-by-item listing
8 system, so adding individual substances on a case-by-case
9 basis, but there was a second option that we recommended -- we
10 found quite appealing, which involves alignment with EPA's
11 tolerance exemplars, and ultimately, then, to accept the inert
12 ingredients that the EPA's already vetted for food use
13 safety, accepting a short list of materials that clearly
14 violate organic priorities, so substances such as PFAS
15 compounds, certain epoxidated alkyl phenol, and so on.

16 We believe the second option's a faster,
17 scientifically justified option that leverages years of EPA
18 toxicology and environmental safety work, but then also lets
19 the organic community carve out exceptions as needed, and there
20 are a number of benefits to this approach, we believe. This
21 kind of alignment between USDA and EPA on this new framework
22 would reduce review backlogs, as an example. And as mentioned
23 in the October 2024 recommendation, it can be developed as a
24 hybrid model that keeps the National List of Allowed and
25 Prohibited Substances as it is, adds the safe, EPA-cleared

1 inerts, and then periodically reviews the list for sunset
2 review, so thank you for your time.

3 CHAIR BRUCH: All right, Artie, thank you so much. I
4 see a question from Brian. Go ahead, Brian.

5 BD. MEM. CALDWELL: Yeah, thanks, Artie. I'm
6 wondering, you were in favor of an option, for reviewing inerts
7 that utilizes EPA lists, and you pointed out that some of the
8 materials on those lists would not definitely be compatible
9 with organics, and I'm wondering how, if that's the case, why
10 should we be confident that the other materials that are on
11 those lists would be compatible with organics and not use sort
12 of a case-by-case review for that?

13 MR. MCKIM: I think it's a fair question. I believe
14 that there are a small number of quite obvious and perhaps
15 questionable substances that would basically minimize the work
16 involved with this exercise.

17 Frankly, there are a number of materials on some of
18 the EPA lists that haven't been reviewed for some time, but
19 there are others that have much more recent review status, so
20 we believe it's a workable approach.

21 CHAIR BRUCH: All right, thank you, Artie, for
22 that. I'm going to just ask, is there any final questions here
23 from the Board for Artie? I'm not seeing any hands, so thank
24 you so much, Artie, for joining us with your comments, and I
25 will -- yeah, absolutely.

1 And actually, that concludes today's public comment
2 webinar, so thank you to everyone for your help, both Board
3 members and the community for the assistance in managing this
4 delicate environment of wanting to have a robust exchange, but
5 ending on our time that we scheduled, actually before 5:00
6 Eastern, so we did it. Thank you.

7 We have a lot to think about with all the comments
8 that were exchanged and written comment docket is still open,
9 so if there's more information you want to exchange with the
10 Board, please leverage that. We will reconvene on Thursday --
11 or sorry, we'll reconvene actually on Tuesday, so next week,
12 Tuesday, April 29th, in Zoom for our NOSB meeting, and really
13 appreciate it, and thank you, we'll see you on Tuesday,
14 everybody.

15 BD. MEM. DESCHENES: Great job, Amy.

16 CHAIR BRUCH: Thanks, all, good job to everybody.
17 (Whereupon, at 4:55 p.m., the virtual hearing in the above-
18 entitled matter was adjourned until Tuesday, April 29, 2025, at
19 12:00 p.m., Eastern Standard Time.)

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CERTIFICATION

This is to certify that the attached proceeding before the:
NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: SPRING 2025 NOSB COMMENT WEBINAR

PLACE: Zoom for Government

DATE: April 24, 2025

was held according to the record, and that this is the
original, complete, true and accurate transcript which has been
compared to the recording accomplished at the hearing.



Elaine M. LaRosee, CDLR

Official Reporter

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In The Matter Of:
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
SPRING 2025 BUSINESS MEETING DAY 1

Vol. 1
April 29, 2025



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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC STANDARDS PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

SPRING 2025 BUSINESS MEETING

DAY 1

Tuesday,

April 29, 2025

Held via Zoom for Government

National Organic Standards Board (NOSB) Members

Amy Bruch, NOSB Chair

Allison Johnson, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Kathryn Deschenes

Carolyn Dimitri

Amanda Felder

Andrea Hatziyannis

Cat McCluskey

Dilip Nandwani

Logan Petrey

Corie Pierce

Franklin Quarcoo

Kyla Smith

Javier Zamora (absent)

National Organic Program Staff, Standards Division

Erin Healy, Division Director

Jared Clark, Assistant Division Director

Andrea Holm, Agricultural Marketing Specialist

Heather Kumar, NOSB Food Technologist

Michelle Arsenault, NOSB Advisory Committee Specialist

Johanna Mirenda, Agricultural Marketing Specialist

Devon Pattillo, Agricultural Marketing Specialist

Jason Edmonson, Agricultural Economist

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P R O C E E D I N G S

(Time: 12:00 p.m., EST)

1
2
3 MS. ARSENAULT: I have the top of the hour, folks.
4 And it looks like we have about 55 people on the line with
5 us, in addition to a bunch of NOP and the board staff. So,
6 I think we can get started.

7 I'm going to hand the virtual gavel over to Chris
8 Purdy to kick us off. Chris.

9 DEPUTY PURDY: All right. Good morning/good
10 afternoon, everyone, depending where you are. I know we
11 have hundreds -- or we will have hundreds of participants
12 from the U.S. and around the globe. We appreciate your
13 participating with us. I would like to call to order the
14 72nd meeting of the National Organic Standards Board.

15 My name is Christopher Purdy. I'm the Acting
16 Deputy Administrator of the National Organic Program, a
17 position Dr. Jenny Tucker usually holds. I'm delighted to
18 welcome you to the -- virtually to the spring meeting of the
19 2025 NOSB.

20 I would like to introduce the NOP team who is here
21 today, Andrew Malone, Associate Deputy Administrator and
22 Erin Healy, the Director of the Standards Division. And
23 with Erin is Jared Clark, Michelle Arsenault, Heather Kumar,
24 Joe Miranda, Andrea Holm, Devin Petillo, and Jason
25 Edmondson.

1 I would also like to welcome the five new NOSB
2 members who began their terms in January of this year:
3 Amanda Felder in the Handler seat; Katherine Deschenes, I
4 apologize if I mispronounce that, in -- also in a Handler
5 seat; Dr. Cat McCulskey -- McCluskey in the Environmental
6 Protection seat; Andrea Hatziyannis in the Retailer seat;
7 and Corie Pierce in the Farmer seat. I apologize if I
8 mispronounced any of your names.

9 Although I'm new to the world of organics, I've
10 already seen the passion and principle that organic farmers
11 and businesses bring to organic production. You all know
12 this very, very well, but the USDA National Organic Program
13 establishes national standards for the production, handling,
14 labeling, and enforcement of organic products in the United
15 States. In consultation with the National Organic Standards
16 Board, the NOP develops rules and regulations that ensure
17 organic products meet specific requirements before they can
18 be labeled as USDA organic. Key components of the standards
19 include the National List of Allowed and Prohibited
20 Substances, which outlines what substances can be used in
21 organic production, and the requirement for products to be
22 verified by a USDA accredited certifying agent. NOP relies
23 on the dedication of its staff and the volunteer efforts of
24 NOSB members to make recommendations and decisions important
25 regarding organic integrity. Thank you to our board members

1 and staff. We truly, truly appreciate your efforts.

2 Thank you also to the members of the organic
3 community located across the globe for your interest and
4 participation today and over the next couple of days. I
5 look forward to the discussion over the next three days and
6 beyond.

7 Just a little bit about myself before we dive into
8 the meat of the program. I've been with USDA for about 18
9 years in a variety of capacities, including Deputy
10 Administrator of AMS' Specialty Crops Program with services
11 dedicated to moving produce from the farm to table. I also
12 served with AMS's Commodity Procurement Program buying a
13 variety of agriculture products for shipment to food banks
14 and schools feeding hungry Americans, particularly during
15 COVID and other national emergencies. I live with my wife
16 of 36 years in a suburb of Washington, D.C. We have three
17 grown granddaughters and three small grandchildren. Topping
18 off the activity, we have a Labrador Retriever who adores
19 the grandchildren because of the attention she gets and the
20 treats, as well.

21 At this point, I would like to hand the mic over
22 to NOSB Board Chair Amy Bruch, who will preside over the
23 meeting.

24 Amy, so much thanks to your efforts at keeping the
25 NOSB discussions on track, keeping NOP informed. Without

1 your efforts this will not be as successful a meeting as --
2 so we appreciate your commitment and focus and time. Thank
3 you, Amy.

4 CHAIR BRUCH: Excellent. Thank you so much,
5 Christopher, for joining us here today. We're looking
6 forward to your leadership with our program.

7 And without further ado, our first item of
8 business is the agenda overview. Then we're going to get
9 into a board roll call with introductions. And then I have
10 also a Chair's Report.

11 So thank you, Michelle, for popping up the screen.
12 We have our agenda, our roadmap for the next three days laid
13 out in front of us. As I mentioned, we're in the Overview
14 section of the agenda. We have the board introductions.
15 We're going to turn to Nate Lewis for the Secretary's
16 Report. We have an NOSB Report by myself and our Vice
17 Chair, Allison. And then we'll turn it back over to the NOP
18 for an update, with some Q&A. We do have guest speaker for
19 our board meeting, which is the Transition to Organic
20 Partnership, TOPP, southwest region. Then we will start our
21 board deliberations, discussions with the Policy Development
22 Subcommittee. And then we're going to adjourn for the day.

23 Day 2, we continue on with our subcommittee
24 meetings and deliberations. We have Handling and Crops.

25 And then moving on to Day 3, we're going to tackle

1 the rest of the subcommittee -- subcommittee presentations,
2 discussions, and votes with Livestock, Materials, and then
3 Compliance, Accreditation, and Certification. We will -- if
4 we do have deferred votes, we'll get to those at the very
5 tail end of the day, including an overview of our upcoming
6 NOSB work agenda, a Materials update, other business, and
7 then closing remarks, then we'll wrap it up. So we have
8 kind of a jam-packed virtual experience here. And we'll be
9 showing this agenda at the top of every day.

10 So without further ado, I'm going to do board
11 introductions. And I'm going to turn it over to each person
12 in alphabetical order, and that will serve as our roll call.

13 So without further ado, let's go to Brian
14 Caldwell. Thank you again, Brian, for your technical
15 expertise. Please state your name, the seat that you're
16 sitting in, and also a brief bio, if you don't mind.

17 BD. MEM. CALDWELL: Well, thanks, Amy.

18 Yeah, I'm Brian Caldwell, and I run Hemlock Grove
19 Farm in Central New York State. This is my last year on the
20 NOSB, and I'm in a Consumer and Public Interest seat.

21 I'm retired from Cornell University, where I was a
22 field manager for several organic research projects in field
23 crops and vegetable crops. And my own little farm was first
24 certified in 1986, and we produce organic fruit and nut
25 crops.

1 CHAIR BRUCH: Brian, thank you for kicking us off,
2 and thanks again for all the technical experience in the
3 wealth and knowledge provide the board.

4 Moving on to our first new member, Kathryn
5 Deschenes. Go ahead, Kathryn.

6 BD. MEM. DESCHENES: Hey, and good morning/good
7 afternoon. I'm Kathryn Deschenes, coming to you from
8 Lafayette, Colorado. But I grew up in rural Kansas. I sit
9 in the Handler seat, and as Amy said, this is my first
10 meeting. Excited to be here.

11 I currently work for Danone North America as the
12 Director of Regulatory Affairs. Our brands span across
13 product lines, but include Happy Family Organics, Silk, and
14 So Delicious, among others. And when I'm not at work, you
15 can usually find me playing chauffeur to my two young girls,
16 five and eight. Thank you.

17 CHAIR BRUCH: Excellent, Kathryn. And I apologize
18 for the last name. I'll be working on that.

19 BD. MEM. DESCHENES: Oh, you're good.

20 CHAIR BRUCH: All right.

21 BD. MEM. DESCHENES: It's a tough one.

22 CHAIR BRUCH: Yes. And now we have Dr. Dimitri.
23 Carolyn, go ahead.

24 BD. MEM. DIMITRI: Good afternoon, everyone. I'm
25 Carolyn Dimitri. I, like Brian, sit in a Consumer and

1 Public Interest seat, and also am in my last year on the
2 board. It's been a fascinating eye-opening experience and a
3 privilege to work with all of my board members.

4 I'm an applied economist. I'm on the faculty of
5 New York University. I used to work for USDA's Economic
6 Research Service, and I have a wide range of applied
7 economic research completed on the food system and on
8 organic, in particular. Thanks again, everyone.

9 CHAIR BRUCH: Thank you, Carolyn. Really
10 appreciate the economist perspective.

11 All right, next up, we have Amanda Felder.

12 BD. MEM. FELDER: Hi. I'm Amanda Felder. I'm
13 calling in from Salinas, California. I live with my husband
14 and my son that's nine years old. We're big baseball and
15 Disney fans here.

16 I work at Taylor Farms. I am in charge of all of
17 our organic certifications across North America for several
18 facilities, our large and small farming operations. We also
19 have a retail operation, a certified organic caf . So I
20 pretty much touch most bits when it comes to handling. This
21 is my first year as -- in your Handler seat, so looking
22 forward to being on this side of the conversation. Thank
23 you.

24 CHAIR BRUCH: Excellent, Amanda. Looking forward
25 to serving with you.

1 Next up, Andrea Hatziyannis.

2 BD. MEM. HATZIYANNIS: Hi. I'm Andrea. I'm
3 calling in from Arizona, where I work for Sprouts Farmers
4 Market. I'm currently a category strategy manager, and our
5 business serves the natural channel, selling a lot of
6 natural and organic products to consumers every day.

7 My background, I've been in the industry for over
8 20 years. I spent 15 years on the manufacturer side,
9 developing and launching organic and natural products into
10 the marketplace for companies like Danone and Stonyfield and
11 the Campbell Snacks Group. And I look forward to
12 participating in the board. When I'm not working, I spend
13 time with my family, my two kids and my husband, and we like
14 being outdoors and happy to be in Arizona for all the
15 sunshine.

16 CHAIR BRUCH: Excellent. Thank you so much,
17 Andrea. We're excited to have your point of view,
18 especially from the retailer side of things.

19 All right, next up, Allison.

20 VICE CHAIR JOHNSON: Hi, everyone. I'm Allison
21 Johnson. I'm a senior attorney with the Natural Resources
22 Defense Council, NRDC, and I'm based in Oakland, California.
23 This is my fourth year in the Consumer and Public Interest
24 seat on the board, and I currently serve as Vice Chair of
25 the Board, as well as the Chair of Handling Subcommittee. I

1 have degrees in nutritional sciences, gastronomic sciences,
2 and law. And before I became an attorney, I worked in the
3 handler certification at PCOS for a number of years.

4 NRDC is an environmental nonprofit that works to
5 safeguard the earth, its people, its plants and animals, and
6 the natural systems on which all of life depends. My
7 current work focuses on reducing use of pesticides that are
8 harmful to pollinators and people. And I'm always so
9 grateful to see organic producers leading the way.

10 I'm not sure why I look like a ghost on Zoom
11 today, but I'm calling in from an old, haunted lodge, so
12 nothing else will happen, but keep an eye out in the
13 background here. Great to be with you all.

14 CHAIR BRUCH: Thank you, Allison. We need some of
15 the Vitamin D from Andrea's neck of the woods your way.
16 Thanks for your leadership and also the legal point of view.
17 And Allison's really great example about board members could
18 actually be filling several different seats. You mentioned
19 certification and all the other experiences you have, so
20 thank you so much.

21 Nate Lewis, go ahead. You're next.

22 SECRETARY LEWIS: Good morning from Olympia,
23 Washington. My name is Nate Lewis. I serve as the Chair of
24 the Policy Development Subcommittee, and as Secretary of the
25 Board. I sit in a Resource Conservation Seat. My day jobs

1 are with the Washington Farmland Trust, where we work to
2 preserve threatened farmland across the state of Washington
3 through negotiation and execution of conservation easements.
4 I have experience as a farmer, as well. My wife and I have
5 operated an organic livestock, poultry, and crop farm for
6 over 20 years.

7 And, oh, I was going to mention that the -- I was
8 recently demoted as my child's chauffeur as she just got her
9 driver's license. So, Kathryn, enjoy it while it lasts. It
10 is a fleeting moment in your life.

11 CHAIR BRUCH: Nate, thank you so much. Thanks for
12 the wealth of knowledge you bring to the board. Really
13 appreciate it and your leadership.

14 All right, we have Cat McCluskey next.

15 BD. MEM. McCLUSKEY: Hey, good morning, y'all.
16 I'm Cat McCluskey. I'm calling in from my home here in
17 Madison, Wisconsin. And I also sit on an Environmental
18 Protection and Resource Conservation seat. I am just
19 beginning my service. I'm quite honored to serve on the
20 board, and I will be, of course, serving for five years, so
21 until January of 2030.

22 I am the policy and advocacy director for Organic
23 Seed Alliance. We are a national organization that conducts
24 research and training with seed producers and develops
25 policies for organic seed, food, and farming systems. I

1 hold a doctorate in environment and resources and a master
2 in agroecology from the University of Wisconsin-Madison, and
3 a bachelor in agricultural systems analysis from the
4 Evergreen State College. Holler to my other Environmental
5 seat, Nate Lewis; little Geoduck double up there.

6 My research focuses on food systems and germplasm
7 management and diversity, as well as, data access and
8 transparency, intellectual property, market concentration,
9 and the democratization of science and knowledge. So from
10 that list, if you haven't gathered, I am an
11 interdisciplinarian through and through.

12 Thanks, Amy.

13 CHAIR BRUCH: Excellent. Welcome, Cat. We're
14 looking forward to having you and the other members of your
15 class to dive in. Thanks for the contributions to our
16 community.

17 CHAIR BRUCH: All right, moving on to Dilip. Go
18 ahead, Dilip.

19 BD. MEM. NANDWANI: Good morning. My name is
20 Dilip Nandwani, and I work for Tennessee State University in
21 Nashville, Tennessee. I'm a full professor, and my program
22 is in organic agriculture, and it's a land-grant
23 institution, so I do research, teaching, and extension.
24 And, of course, the service, what I'm doing now, serving on
25 the NOSB. It has been a great pleasure and privilege

1 working with a wonderful group of people in NOSB. And this
2 is my fourth year, and I serve on the Environmental
3 Conservation seat.

4 I'm married, 31 years, two grown-up kids, daughter
5 and son. Blessed with that. And I do serve on Materials
6 and Handling Subcommittee. So research, teaching, and
7 extension, working with farmers, giving them training on
8 organic certification process, growing organically, and a
9 lot of other training workshops to research, mentoring
10 students. And I teach a course also in organic agriculture.

11 I did serve and work in American Caribbean,
12 University of Virgin Islands, and also at University of
13 Northern Mariana Islands. So this is my fourth university
14 since 2014. I landed here in Nashville, Tennessee, with
15 TSU.

16 Thank you, Amy.

17 CHAIR BRUCH: Excellent. Thank you so much,
18 Dilip. And thanks for connecting the scientific world with
19 our organic farm world. Appreciate it.

20 CHAIR BRUCH: Now, Logan Petrey.

21 BD. MEM. PETREY: Hi. Good morning. My name is
22 Logan Petrey, and I am on my fifth year, final year on the
23 board. I'm in the Farmer's seat. I work for Grimmway
24 Farms. I'm over their organic operations Southeast. Our
25 main crop is carrots, but we do have other veg items, like

1 Calo Brand, and then we rotate also with things like corn
2 and beans. So just a couple thousand acres there, but this
3 has really been a great honor to be on the board. It's an
4 opportunity that has really tied the industry.

5 I was hoping that my screen background would be
6 flopped. Is it backwards for everybody or just me?

7 CHAIR BRUCH: It's you, actually.

8 BD. MEM. PETREY: It's good? Okay, so everybody
9 else is used to the mirror look. I usually use some kind of
10 background of carrots or something in mine, so -- but again,
11 happy to be here.

12 Chris, happy to work with you. And thank you,
13 NOP, for all you do.

14 CHAIR BRUCH: Excellent. Thank you so much,
15 Logan. We love having the Southeast perspective represented
16 here and additional farmers, so thank you so much.

17 Moving on to Corie Pierce.

18 BD. MEM. PIERCE: Hi, everybody. My name is Corie
19 Pierce, and I'm up here in northwestern Vermont on my farm.
20 I'm a new member in the Farmer's seat. I own and operate
21 Bread and Butter Farm, which is a conserved 600-acre
22 diversified farm. We raise 100 percent grass-fed beef,
23 organic vegetables. We have some pigs in our woods and do
24 agroforestry. We also -- we do about 90 percent direct
25 sales to our community. We focus on our CSA. We also do a

1 lot of education about soil building and teaching new
2 farmers. We collaborate with the University of Vermont for
3 a lot of that education work and also with younger kids.

4 Additionally, I founded a nonprofit that is a
5 collaboration of many farmers in our community seeking to
6 purchase and conserve more land and create affordable access
7 to land and eventually, hopefully, affordable housing for
8 farmers. This is a major issue in our area. As I know,
9 it's a major issue in a lot of areas.

10 Yeah, I live here on the farm with my husband and
11 my two teenage kids. My -- both kids work on the farm. My
12 son is majorly into baseball, so I resonate with the
13 baseball fans out there. He's a pitcher in high school.
14 And my daughter is a theater kid. So, we have a lot of fun
15 on the farm. And yeah, I'm honored to be in this. I'm on a
16 steep learning curve and excited about learning more.

17 Thanks, Amy.

18 CHAIR BRUCH: Excellent. Thank you so much,
19 Corie. We're so happy to have you on the board. Thanks for
20 diving in.

21 Next up, we have Franklin. Franklin Quarcoo.

22 BD. MEM. QUARCOO: Hello. My name is Franklin
23 Quarcoo. I'm a research extension associate professor of
24 entomology at the State University in Alabama, with a three-
25 part appointment: research, teaching, and extension. I'm

1 currently in my third year on the board on the Environmental
2 Protection and Resource Conservation seat, and I also serve
3 as the Materials Subcommittee Chair. Glad to meet you all.

4 CHAIR BRUCH: Excellent. Thank you so much,
5 Franklin. Really appreciate your technical expertise.

6 Kyla. We have Kyla Smith.

7 BD. MEM. SMITH: Hi, everybody. My name is Kyla
8 Smith. It is prime grass-mowing weather in my neighborhood,
9 and so hopefully the background noise is not coming through.
10 I see heads shaking no, so that's good. It's just annoying
11 me. Thank God for noise-canceling headphones.

12 Anyway, glad to be here. I am in my last year,
13 which is so wild. It's so funny how when you get on the
14 board, you're like, oh, my gosh, five years just seems like
15 an eternity, and then it just goes like a blink of an eye.
16 I'm serving in the Certifier seat.

17 I work for PCO. We're an accredited certification
18 agency that's based in Pennsylvania, but we certify
19 nationwide. I've worked in certification for over 20 years.
20 I always say when onboarding new staff that I've pretty much
21 done all the jobs at PCO, so I've done inspecting and file
22 review. I ran the certification department for a minute,
23 and I'm now serving as the certification policy advisor, so
24 I get to focus on what truly makes my heart sing, organic
25 policy work. And it's just been such an honor to serve with

1 everybody on this board.

2 And you're doing a great job, Amy. So back to
3 you, Madam Chair. Table mate. My table mate at our non-
4 table; what are we going to do?

5 CHAIR BRUCH: I know, virtual table mates. That's
6 right. And thank you, Kyla, for your leadership.

7 Kyla was our former board chair, the Chair
8 Emeritus, is the honorable title that you wear during this
9 meeting, but again, just an honor to have you a part of the
10 team, and love that you're passionate about the
11 certification world, because that really shines through. So
12 thank you so much.

13 And next board member to call is Javier Zamora.

14 BD. MEM. ZAMORA: (No response.)

15 CHAIR BRUCH: And Javier, just for the record, is
16 absent.

17 And last person for roll call is actually myself.
18 So I am really humbled and honored to be a part of this
19 board, and wow, impressive backgrounds and perspectives you
20 all bring. It just gives me chills.

21 Anyway, I am Amy Bruch. I'm a sixth generation
22 farmer, and currently I reside in the Farmer's seat on the
23 NOSB, and I am in my final year, so two meetings left,
24 including this one.

25 I'm an ag engineering grad from Iowa State, and I

1 have two decades of experience in the agricultural sector as
2 a systems engineer in production ag, agribusiness, and
3 consulting by helping fellow farmers transition to organic
4 production. And organic is -- organic farming is just a
5 passion area of mine, as well. I lived and farmed in Brazil
6 for six years along with my husband, and I've worked in many
7 ag projects across South America, Africa, Europe, and many
8 places in the United States, including close to Logan, so
9 it's been fun to share some Florida production notes with
10 her.

11 With the passing of my father and the desire to
12 keep my family farm in the family, my husband and I returned
13 back to Nebraska, so kind of a little bit of a boomerang
14 story here. My primary and favorite job, and I've had a
15 few, is farmer on my family farm. It's located in East
16 Central Nebraska. We're 100 percent organic or transitioned
17 to organic, and we're 100 percent irrigated, so unique
18 challenges with water. We primarily grow food-grade row
19 crops, such as organic corn for tortillas and chips,
20 soybeans for tofu, small grains, pulses, etc. And I'm just
21 so happy to be here again.

22 And without further ado, now that we've done board
23 introductions and also roll call, I'm going to turn it over
24 to our board secretary, Nate Lewis.

25 SECRETARY LEWIS: Great. Thanks, Amy.

1 Just a moment before we hop into the Secretary's
2 Report; I just want to acknowledge the NOP staff who have
3 kept this institution going. For those of you who don't
4 know, we get these -- oh, maybe I'll try to bring it into my
5 Zoom. There we go. There it is. We get these board
6 packets, and it has all the materials, including the
7 Secretary's Report, which allows us to review it in hard
8 copy, but I just wanted to acknowledge NOP staff right now,
9 especially Michelle for, sort, of supporting the institution
10 and the people who make up the board. With our -- with our
11 packets came snacks, which I've already eaten last week at
12 the NOSB Public Comment Period, but I just wanted to do a
13 quick Zoom snap, circle, or claps. I love to see the hearts
14 and smiles coming from the gallery. That's wonderful. But
15 NOP staff, you deserve so much credit for keeping this
16 going, and we really, really appreciate you.

17 So with that, I'll jump into the Secretary's
18 Report. Board members were provided a -- meeting minutes
19 from our last meeting in the fall, and we ask members now to
20 accept those minutes as written or if there are any
21 corrections.

22 (No response.)

23 SECRETARY LEWIS: Not seeing any corrections, we
24 will accept the minutes as written. Thank you.

25 And I'll turn it back over to the Chair, Amy.

1 CHAIR BRUCH: Thank you, Nate. Really appreciate
2 that.

3 All right. The next segment of our meeting
4 involves the Chair's Report. So I will begin, and then I
5 will be handing it over to the Vice Chair, Allison.

6 Hello, fellow board members, NOP team, and the
7 organic community. As many of you can relate, we are
8 rounding out the month of April, and in Nebraska and many
9 places across the country, this time of year is planting
10 season. We will actually be starting later today on my
11 family farm.

12 My days usually start by reviewing my list and
13 considering the variables of what I can control and what I
14 can't control. I do my best to focus on those things that I
15 can control. I can wake up my boys, now one and three, and
16 make sure they have a good organic breakfast. I can drive
17 to the fields and make sure I know which soils are ready to
18 plant, which fields can we do pre-tillage, which pivots need
19 some work, and I can make sure those items get tended to.
20 It's every farmer's favorite thing to talk about, but
21 sometimes I even have to remind myself that despite working
22 from sunup to sundown, I can't control the weather.

23 I can't control when a windstorm knocks over a
24 pivot or a hailstorm takes out what I know is going to be an
25 incredible crop of organic corn two months before harvest.

1 Despite Mother Nature always having the last word in
2 farming, she does leave a little room for folks who work
3 hard and keep on pushing to have a say in how their organic
4 crops turn out, how prosperous their businesses are, and how
5 delicious their harvest tastes. When I drive around on a
6 crisp April morning, I'm thinking about how I'm going to
7 innovate and dream big enough to make room for my boys to
8 join my husband Tyler and I on the family farm for the
9 seventh generation.

10 And I give thanks to this community for pioneering
11 a standard that makes that dream even possible. I think
12 about how many family farms have been saved by certified
13 organic production, including my own, and also how many more
14 parents get to dream about their kids coming home to farm
15 with them one day.

16 As I prepared for this meeting, I've been thinking
17 about how much preparing for an NOSB meeting is like
18 planting an organic grain crop. Farmers can draft that soil
19 just perfectly only to have a snowstorm, which we have had
20 them in May, delay planting until much later than expected.
21 Farmers can spend months planning the perfect rotation only
22 to have a drought hit and make them switch plans. I'm
23 grateful for 26 letters in the alphabet because it is rare
24 that Plan A works. Despite the best efforts, some things
25 fall out of our control. But just like farmers, we board

1 members, and the organic community, still pull through and
2 get those seeds in the ground. And boy, did you all pull
3 through.

4 Last week, we heard from so many farmers,
5 agronomists, handlers, material experts, certifiers,
6 advocates, and other important members of our community.
7 Board members asked well-researched questions, and the
8 community responded with equally well-researched answers.
9 The NOSB is one of the first of any FACA boards to meet this
10 year.

11 Listening to the robust discussions last week
12 reminded me yet again what a strong and cohesive organic
13 community we have. With every sector of the supply chain
14 represented, I'm really pleased we have the chance to
15 demonstrate just how effective the public-private
16 partnership is, how strong our sector is because everyone in
17 the community participates, and how important it is to have
18 a path to help inform USDA about what the organic community
19 needs, about our challenges, and also our triumphs.

20 Coming off our public comment period, one clear
21 theme that arose was just how big the organic opportunity is
22 for the American farmer to prosper through organic
23 certification. We heard that there are some big challenges,
24 but we also heard that testing for verification is a
25 solution ready to go. Organic is a market that U.S.

1 consumers want to support. Farmers, buyers, certifiers all
2 said loud and clear that we need a fair playing field to
3 keep the trust that over 20 years of organic certification
4 has provided.

5 Listening to public comments, I was also reminded
6 about how entrepreneurial the organic community is. When
7 consumers work to build a healthy and clean food system
8 through organic certification, it was innovative and
9 entrepreneurial farmers and food companies who rose to the
10 challenge and reimagined how we meet the consumer demand.
11 As the backbone of the organic industry, the work
12 entrepreneurs do in organic brings prosperity to rural
13 America, making all of America healthier.

14 I would like to take the time to highlight the
15 work that went into making this meeting flow. I want to
16 give a huge shout out to our five new board members, Andrea,
17 Amanda, Corie, Cat, and Kathryn. As some of you who have
18 served on the board can attest, the first meeting is like
19 drinking from an irrigation pump; no matter what, it's a ton
20 of information to digest. These five, and in all honesty,
21 the whole board, had to accelerate their preparation to meet
22 the unique timing needs of this meeting. I never doubt that
23 anyone on this board is powerhouse, but to you five, I just
24 have to say, wow. I know the future of the board is in good
25 hands. As we celebrate these five new members, it's

1 bittersweet to remind the community that my class of five,
2 Brian, Kyla, Logan, Carolyn, and myself are in our final
3 year of service. And we want everyone to be paying close
4 attention to the forthcoming call for nominations. Look
5 around your organic communities and find your best and
6 brightest and send them our way.

7 I can't believe I'm in my ninth meeting. The time
8 sure has flown, but luckily my class has another meeting
9 together, so I can only hope we can celebrate together in
10 person this fall in Nebraska. So, don't forget to make sure
11 to reach out to your teammates on this board. I am so happy
12 to serve with all of you, and we don't actually get to pick
13 our teammates, but even if I was given the chance, I don't
14 think I could have picked a better bunch of folks to do this
15 work with. Every single one of you embodies all that is
16 good in this community. It's an honor to serve with all of
17 you. Even though the new class -- the next year's class
18 represent a big turnover on the board, I'm incredibly
19 grateful for the pipeline of leaders we have currently
20 serving and ready to take over.

21 Allison, Nate, Franklin, Phillip, thank you so
22 much for ensuring the work will continue with such a degree
23 of quality and commitment to process. I especially am
24 thankful for the collaborative leadership from Allison, our
25 Vice Chair, and Nate, our board Secretary, and having Kyla

1 as our Chair Emeritus. These board members bring a lot of
2 experience and a lot of technical expertise, but learning
3 the ins and outs of the federal process takes some pretty
4 special leaders.

5 We are so very lucky to have Michelle and Heather
6 making sure that the I's get dotted and the T's get crossed.
7 Michelle, I'm not the first to say this, but you are the
8 hardest worker I've ever met. You keep things running
9 smoothly with humor and grace. The entire organic community
10 sees you and applauds just how excellent you are. Heather,
11 you have certainly jumped in feet first, and I know I speak
12 for all of us when I say how grateful we are for your
13 excellent work.

14 If we were together in person, you would notice a
15 face sitting to the left of me, but in Zoom, I want to make
16 sure he gets a proper organic welcome. Christopher Purdy
17 stepped into the role of Deputy Administrator in February
18 and has brought a wealth of experience from his prior role
19 in the USDA. And I want to personally extend a warm welcome
20 to Chris and thank him for joining us today.

21 To all of you in the audience, with the passing of
22 this meeting, I'm reminded that we only have a brief time on
23 this board individually. Like farmers, we only get to have
24 so many Aprils or seasons to plant our crops and hope for
25 good yields. But looking at all of you on the Zoom, I'm

1 reminded that as a community, the work continues, as do the
2 yields. I'm so grateful that for 20 plus years, the organic
3 community has been planting and tending to the crop that is
4 the organic standards. What an incredible harvest that you
5 all have worked so hard to achieve and many more. It's an
6 honor to share this meeting with all of you.

7 Thank you for showing up. Let's keep growing
8 together. Welcome to the 2025 NOSB Meeting.

9 All right, and I'm going to turn over the mic to
10 Allison next.

11 VICE CHAIR JOHNSON: Thanks so much, Amy. You
12 captured all of that beautifully and I don't have a ton to
13 add, but I'll just add a few points of appreciation to kick
14 this off today.

15 First, I really want to appreciate my fellow board
16 members and especially Amy, who has gone absolutely above
17 and beyond to guide us through this really unusual year with
18 unwavering grace and humility. Thank you.

19 I want to appreciate the organic community that
20 continues to adapt to change, to engage with us so
21 thoughtfully and provide innovative input and to continue to
22 hold us accountable. We really appreciate you and your
23 dedication and vigor.

24 I want to appreciate and echo the appreciation for
25 the NOP that I heard in so many public comments and that

1 Nate and Amy just called out beautifully. The dedicated,
2 hardworking public servants have helped build this National
3 Organic Program into the force that it is today and will
4 continue to steward it. We really, really value your
5 service and thank you.

6 And finally, I want to appreciate our families,
7 our support systems, all the people who help NOSB members
8 disappear from regular life for several weeks a year. It's
9 a really heavy lift for board members, but also for the
10 people who are missing us for parts of the year, and we
11 really couldn't do it without you. So thank you all.

12 There are so many challenges facing agriculture,
13 and I take so much comfort in the fact that organic farmers
14 are ahead of the curve, identifying solutions, and that the
15 organic community is really committed to working together to
16 take on whatever comes next. We're all in this together,
17 and I'm so proud of the unwavering commitment that I see
18 from producers, from consumers, and everyone else in
19 between. It's an honor to serve with you all. I'm looking
20 forward to this meeting. Thank you.

21 CHAIR BRUCH: Thank you, Allison. I really
22 appreciate those remarks.

23 One reminder, because we do like reminders, and
24 there'll be some slides later on about this, is just to
25 inform the board that we will be voting. We have seven

1 voting items, and we'll be voting alphabetically, all by
2 name, and then we will stagger that.

3 And then also for the board and the community,
4 just to note that we did compile a Conflict of Interest
5 Survey amongst our board members for the topics that we're
6 going to be discussing, and there were no recusals to
7 report.

8 I would like to turn over the mic to our Deputy
9 Administrator, Chris Purdy, for the NOP update. Thank you,
10 Chris.

11 DEPUTY PURDY: Thank you, Amy, and thank you for
12 the kind words for the NOP staff.

13 I came over from a great program, and I landed in
14 a fantastic program, and just really appreciate the people I
15 work with, and just appreciate your kind words to them.
16 Just, I would like to provide some, you know, updates on the
17 National Organic Program, some of our successes, some of the
18 projects we're working on. Some of this may be familiar to
19 you, but we're excited about it, so we wanted to, kind of,
20 lay a little bit out.

21 I'll also use this as an opportunity for you to
22 meet some of our other staff, as well. I'm going to be
23 asking -- so that you don't listen to me drone on for 20
24 minutes, I'm going to be asking them to jump in and talk
25 about their respective programs. So, let's -- if we could

1 go to the next slide. Wonderful.

2 It's been just over a year since SOE
3 implementation, occurring on March 19th of 2024. The
4 progress the organic community has made in implementing SOE
5 is a testament to your commitment to ensuring organic
6 integrity and transparent supply chains. In the NOP, we are
7 already seeing positive signs of progress.

8 For example, SOE has required more businesses to
9 become certified, which is resulting in both visibility and
10 oversight over organic supply chains. Custom brokers and
11 Customs & Border Patrol are actively stopping products that
12 are not compliant with SOE. This helps ensure import --
13 imported organic products meet the U.S. organic standards,
14 thus strengthening the organic label. I know we have some
15 discussions and some more things to do in this area, but I
16 think we're off to a good start.

17 Certifiers have updated their certification
18 processes to verify whether the farms and businesses they
19 certify comply with new requirements of SOE. Three key
20 updates include establishing clear protocols for conducting
21 supply chain traceability audits, issuing NOP import
22 certificates, and certifying producer groups. We have been
23 able to identify trends and act on them, even in the short
24 time since implementation. NOP continues to provide
25 resources and tools to help operations in the supply chain

1 become certified, while also reserving the capacity to take
2 action against noncompliant organic entities. Since the
3 implementation of SOE, more operations are becoming
4 compliant. As I mentioned, we can see that by -- we can see
5 that by the increase in the number of operations who are now
6 certified.

7 From January 1 of 2024 through March 31 of 2025,
8 the NOP has seen 3,378 U.S. handlers become certified, and
9 we have seen a total of 7,105 new handlers worldwide. In
10 the fall, we completed a desk audit, taking a deep dive into
11 the proposed practices and procedures of certifiers. This
12 review of certifier oversight of SOE implementation shows
13 that improvements are happening. Now that NOP is in the
14 full enforcement phase, we are continuing to see new trends
15 in certification, as well as certifier oversight.

16 We also see an increase in the number of import
17 certificates. NOP saw 1770 -- 177,000 NOP import
18 certificates issued between March 19th of 2024 through
19 February 28, 2025. We need to update these numbers. The
20 Customs & Border Protection Electronic import tracking
21 system, called ACE, shows over 104,000 certificates for
22 organic imports. ACE is the Automatic Commercial
23 Environment. Over the first two months of the year, 94
24 percent of the NOP import certificates have match data in
25 ACE, which is up 75 percent from the spring of 2024. This

1 shows that certified operations and certifiers alike are
2 consistently improving their usage of the data and
3 information. Currently, 68 percent of the NOP import
4 certificates are issued by USDA certifiers, while the rest
5 are mostly issued by certifiers in the EU, Canada, and
6 Japan.

7 I like this chart. NOP monitors trends in
8 imports. Here is a chart showing the Top 10 Country-
9 Commodity Import Pairs from January and February 2025. You
10 can see that beef is the top organic import coming in from
11 Uruguay and Australia. NOP is performing risk-based
12 surveillance on these -- of these imports this year. We see
13 other imports such as avocados, maple syrup, and bananas
14 that are not regularly produced domestically. Mexico brings
15 in a lot of strawberries, raspberries, and cucumbers outside
16 of regular U.S. growing seasons. We continue to track this
17 information and use it to inform our surveillance practices.

18 At this point, I would like to hand the
19 presentation over to Erin Healy, our Standards Division
20 Director. Erin.

21 MS. HEALY: Hi, everyone. I will give a few
22 Standards updates. If you can go the next slide, please.

23 Our Market Development Rule published in December
24 of last year. Before this rule, there were not specific
25 organic standards for pet food and mushrooms and so there

1 were some different interpretations of the standards across
2 certifiers. So this rule clarifies what the organic
3 standards are for these two markets. And we believe this
4 rule will help boost investment in these two industries.

5 We are allowing organic operations two years to
6 comply with the rule; however, they can start now. So for
7 instance, the rule allows the amino acid taurine to be used
8 in pet food, so pet food manufacturers can begin to use
9 taurine as of now. Next slide, please.

10 So, organic livestock and poultry standards, I
11 want to talk a little bit about the implementation dates and
12 the runway for that. It was published in November of 2023.
13 It became effective in January 2024. As you probably
14 already know, it clarifies livestock health care, living
15 standards, outdoor access, and it clarifies standards for
16 transportation and slaughter. It also adds specific
17 standards to avian species and indoor and outdoor space
18 requirements for poultry. The compliance date for most of
19 the provisions in this rule was January 2nd of this year.
20 That followed a one-year implementation period. However,
21 certain poultry operations have an extended compliance
22 timeline for certain provisions. So for instance, the
23 outdoor space requirements for existing layer and broiler
24 operations will not be until January of 2029.

25 We also published an online training about this

1 rule. It's in the Organic Integrity Learning Center as of
2 August 2024, and that should help farmers, certifiers, and
3 inspectors understand the rule and how to implement the
4 rule. Next slide, please.

5 Just as a reminder, some of the board members
6 mentioned they're in their fifth year, so that means that we
7 will be publishing a call for nominations probably sometime
8 this summer so please look out for that. We will be
9 recruiting five new board members: two Public Consumer
10 Interest seats, two Organic Farmer seats, and one Certifier
11 seat. So, if you know anyone that you think would be a good
12 candidate, please encourage them to apply or send in a
13 nomination for them. And please spread the word; help us
14 conduct a lot of far-reaching outreach so that we get
15 another great set of applicants like we did this past year.
16 And next slide.

17 Just as a reminder, we have the Organic Retailer
18 Toolkit. So if you are a retailer or if you work with
19 retailers, please do spread the word. Let them know about
20 this toolkit. You can actually use that QR code from your
21 phone, and it will take you directly to the website and you
22 can download all the graphics from there. We are
23 encouraging retailers to use these signs or messages in the
24 store, as well as online or in social media. And brands
25 that carry a lot of organic products can use that, as well.

1 We do have a new OILC online microlearning about
2 this. It's, I think, less than 10 minutes, so I have been
3 sending that out to retailers, and you can do that, as well.
4 We sent an Organic Insider about it, I think, about a month
5 ago. So please help us spread the word about that.

6 That is it for me. I'm going to hand it over to
7 my colleague, Robert Yang, who is the Director of the
8 Accreditation Division.

9 MR. YANG: Okay. Thank you, Erin. Before I share
10 the program's thoughts regarding risk-based oversight, I
11 just wanted to take a moment to provide a brief update on
12 the NOP Certifier Accreditation audit activity. We're
13 currently on schedule with this year's Certifier
14 Accreditation audit. Since the beginning of this year, we
15 have already conducted five accreditation audits. We
16 currently have 34 additional accreditation audits to be
17 conducted through the end of this calendar year. And we
18 have five of those taking place in the month of May.

19 As Chris mentioned earlier, certifiers have
20 updated their certification processes to verify whether the
21 farms and businesses they certify comply with the new
22 requirements of SOE. And likewise, the NOP is verifying
23 through its accreditation audit how certifiers are
24 implementing their updated certification processes. So that
25 is, kind of, the main focus of the accreditation audits that

1 will be taking place and -- taking place this year and
2 moving forward.

3 Getting to sound and sensible, risk-based
4 oversight, one of the NOP's priorities this year is
5 exploring sound and sensible, risk-based oversight models,
6 not only for certifying organic farms and businesses, but
7 also in terms of the NOP's approach to overseeing its
8 accredited certifiers.

9 Risk-based auditing is not a new concept. SOE
10 introduces risk to USDA organic certification, specifically
11 in terms of the requirements for producer group
12 certification. For example, operations are required to
13 describe characteristics of high-risk producer group members
14 and producer group production units in their organic system
15 plans, and certifiers are required to conduct risk-based
16 supply chain traceability audits and identify high-risk
17 operations as part of their oversight of the grow group.
18 And so, although it's not a -- risk-based auditing is not a
19 new concept in the world, it is clearly being introduced,
20 you know, through SOE. And as we all know, SOE has brought
21 on additional certification and accreditation requirements.
22 And so, a risk-based approach at this time is essential to
23 ensuring that certifiers can focus and prioritize their
24 resources, their time, their attention and efforts on areas
25 that pose the highest risk and greatest impact to organic

1 integrity.

2 So, the questions we are asking as we explore
3 sound and sensible, risk-based oversight models are, how do
4 we avoid applying a one-size-fits-all approach? How can we
5 take steps to reduce the unneeded burden on small, low-risk
6 farmers in the U.S.? How do we make it easier to be
7 certified organic while still ensuring compliance and not
8 compromising organic integrity? The NOP looks forward to
9 continuing the conversations and also working very closely
10 with our accredited certifiers this year to explore sound
11 and sensible, risk-based oversight models.

12 And now, I would like to hand it over to Lori
13 Tatora, the Director of our Compliance and Enforcement
14 Division.

15 MS. TATORA: Thank you, Robert. It's nice to see
16 everyone this afternoon. I'm going to talk to you a little
17 bit in the next few slides about our enforcement activities.

18 Availability and access to NOP import certificates
19 and aids are essential for supporting and overseeing
20 compliance with organic import requirements. For example,
21 the information must show that the U.S. importer is
22 certified and that each shipment has a corresponding import
23 certificate that was issued prior to export. This is a
24 critical factor, prior to export, not once the product is on
25 the water or arrives at a U.S. port of entry. This

1 information can also provide leads or evidence for
2 investigations of specific transactions and can illuminate
3 suspect activity or patterns in certain supply chains. So,
4 we really look very hard and deep at the data that we have
5 available to us now.

6 To detect and deter fraud in organic imports, the
7 NOP is focusing on two areas; a certifier directive for
8 soybean and soybean meal producers and handlers in West
9 Africa, and investigations of organic soybean and grains
10 exported from Turkey. The NOP is looking at these commodity
11 region pairings because of the high risk for organic fraud.
12 We're targeting specific supply chains and directing
13 certifiers to implement increased oversight practices that
14 include more inspections, supply chain traceability audits,
15 and residue testing. So far, these initiatives have
16 resulted in a large shipment of fraudulent organic corn and
17 soybean meal from Turkey being diverted from the organic
18 market. Multiple operations suspended and revoked, and
19 businesses exiting the organic market entirely. Next slide,
20 please.

21 Residue testing. In August of 2023, the NOP
22 initiated a project to collect samples of organic soy and
23 corn for laboratory testing and traceability auditing. This
24 was self-initiated work that began as a response to
25 investigations and industry oversight, data analysis, and

1 information from stakeholders that identified an elevated
2 risk for fraud in imported products, especially feed
3 commodities, specifically from the Black Sea region, India,
4 and several countries in East and West Africa. So, we heard
5 what our stakeholders were saying, and we took action based
6 on the specialized expertise of the staff at the NOP.

7 NOP directed samples to be collected by trained
8 NOP staff, the USDA Federal Grain Inspection Service, and
9 certifiers. These samples were analyzed at the USDA
10 National Science Laboratories, which also added solvent
11 testing to its portfolio as the NOP evaluated solvent
12 residues as a potential indicator of non-organic processing
13 methods in oilseeds meals.

14 For this project to date, the NOP has directed the
15 collection of over 50 samples of soybeans, soybean meal, and
16 corn. Seven of the organic samples tested positive for
17 GMOs, one of which also tested positive for glyphosate.
18 Hexane was detected in all 10 non-organic soybean meal
19 samples, but not in any of the organic soybean meal samples.
20 Testing for synthetic solvents, such as hexane, may help to
21 detect fraud in organic soybean meal and other oilseed
22 meals, but further analysis is needed. The NOP continues to
23 pair feed sampling with traceability audits back to the farm
24 level and uses import data from the USDA Global Integrity
25 Database to flag and investigate high-risk supply chains.

1 Next slide, please.

2 The NOP initiated the Livestock Directive because
3 we identified fraudulent activities in the organic livestock
4 market, such as both certified and uncertified operations
5 selling and representing non-organic beef and dairy cattle
6 as eligible for organic slaughter. As a result of the
7 Livestock Directive, certifiers issued 156 operations
8 notices of noncompliance or adverse action. As you can see,
9 134 notices of noncompliance were issued. Fifteen notices
10 of proposed suspension were issued. At least six operations
11 had their organic certification directly impacted from
12 actions the certifiers issued. These results show how the
13 organic certifier community increased their oversight of
14 livestock handling operations to protect the integrity of
15 the organic market. Next slide, please.

16 The Livestock Team finished its assessment of
17 origin of livestock compliance using both certifier audits
18 and surveillance visits. We're pleased by how both the
19 certifiers and producers, with some noncompliance's and
20 feedback, came into compliance with this rule. We found no
21 major concerns and will continue monitoring the
22 implementation of origin of livestock requirements through
23 surveillance.

24 NOP is expanding surveillance to include imports
25 of livestock and livestock products. We identified high-

1 risk areas or targets to check compliance throughout certain
2 supply chains back to production. We are sending our
3 request for information to certifiers involved. The first
4 compliance date for many of the requirements to be
5 implemented for the Organic Livestock and Poultry Standards
6 Rule was January 2025. The Compliance and Enforcement
7 Division is preparing livestock surveillance activities to
8 have increased oversight of operations and certifiers to
9 ensure the regulations are evenly implemented across all
10 entities. Next slide, please.

11 We closed 849 complaints in Calendar Year 2024.
12 Almost 300 were resolved at intake without further
13 investigation. This includes complaints to the lack of
14 evidence, out-of-scope products, complaints referred to
15 other NOP divisions, etc. 567 complaints were moved to
16 investigation and closed in 2024. The team was very busy
17 last year and they're on track to be even busier this year.
18 So far this year, we've closed more than 340 investigations.

19 And I will turn it now over to Jon Velej.

20 MR. VELEY: Fantastic. Thanks, Lori. I
21 appreciate it.

22 And what a great time to talk a little bit about
23 our partnership with U.S. Customs & Border Protection. I
24 just got off the phone with another big seizure out in the
25 Port of L.A. in Los Angeles, in Long Beach. So the timing

1 here is fantastic.

2 My name is Jon Veley. I'm the Director of Trade
3 Activities here within the National Organic Program. It's
4 great to have everybody here with us this afternoon and this
5 morning. I want to talk a little bit about our
6 collaboration and partnership with U.S. Customs & Border
7 Protection. I know Chris mentioned it earlier in the
8 beginning of his presentation. And I know you've -- we've
9 talked about this for a little bit over the past couple of
10 years, but now it continues to refine, refine, and get
11 better and stronger every year.

12 So where are we with our partnership at the
13 Commercial Targeting and Analysis Center and what really
14 does it do?

15 So the first thing we've talked about in the past
16 is it gives us access to trade data and shipment data that
17 we don't even have here within -- as a participating
18 government agency. At the federal level we have more
19 detailed access within the CTAC. We share the space with
20 other federal offices such as TTB, the Tax and Treasury
21 Bureau, APHIS, EPA, Fish and Wildlife, FDA, Food Safety
22 Inspection Service, NHTSA, and others. Okay.

23 What's the value of that for us, for AMS? If FDA
24 is investigating a case of fraud, food safety, about an
25 importer that has become a bad actor, that information is

1 now shared across all the members of CTAC so that we can
2 easily take a look at, okay, is this importer someone that
3 has in the past, or currently, importing organic products?
4 We can do a check because, again, a lot of times in talking
5 about the customs world, if there's smoke somewhere, there's
6 usually fire, right? A bad actor doesn't just linger in one
7 area, usually they spread out across all lanes. So very,
8 very helpful to have our federal partners on staff, as well.

9 Proactive targeting capabilities. What does that
10 mean? If we're taking a look at shipments, let's say Lori
11 has issues with certain grain shipments that we want to take
12 a look at, we can obviously see what's coming in throughout
13 the U.S. at every port of entry and determine where it's
14 coming in, how much is coming in, and when it's coming. So
15 proactive targeting capabilities is very important for a
16 violative shipment.

17 Collaboration with CBP personnel. Again, like I
18 said, I just got off the telephone with our Port of Los
19 Angeles, who were -- was taking a look at a shipment that
20 had arrived this morning, and they said, "Hey, it's got a
21 lot of USDA organic seals on it, and we don't see any import
22 certificate, and we're just going to hold it until we can
23 take a better look at it." But they sent us all the
24 importer information, where it's coming from, country of
25 origin, and said, "We'll toss this over to CTAC, you guys

1 take a look at it and determine what we should do with it."
2 So very cooperative as far as dealing with our Customs &
3 Border Protection port personnel.

4 Coordination of seizures and denials. A lot of
5 times we always want to make sure, hey, what did you seize
6 this week? Where is it? And I have to -- we always have
7 to, kind of, slow the ball down a little bit on this,
8 because when something gets seized, there's a whole process
9 of what happens next. So a lot of times you don't hear us
10 releasing a lot of information on big port seizures or, you
11 know, a specific commodity, a specific importer, because
12 there's a lot more information that it has to go through
13 before we can release this publicly. But the coordination
14 of seizures and denials of entry, very important when it
15 comes to Customs. They can help us seize merchandise,
16 products, commodities. They're the -- they're are eyes and
17 ears on the ground.

18 The last big piece that we did two years ago, as
19 most of you know, is we trademarked the seal. The
20 trademarking of the seal was incredibly helpful for going
21 back to trademark infringements and intellectual property
22 rights. This allows us to not only seize a particular lot,
23 commodity, or whatever it may be because of a fraud, but it
24 also lets us go after the importer for counts of trademark
25 violation, intellectual property rights, where we didn't

1 have that tool in our toolbox just two years ago. So it's
2 taken on a whole new aim for the enforcement side of the
3 house. Customs is very good with it. And we also deal with
4 the Intellectual Property Rights Center, which is another
5 federal agency that just goes after trademark infringement.

6 There's a lot going on in this trade space. We
7 have a great network of federal partners that work together
8 every single day, sharing information and really weeding out
9 the bad actors. So that's the -- that's an update from the
10 trade side of the house.

11 Chris, I'll turn it back over to you. I think the
12 next slide is questions for the board.

13 DEPUTY PURDY: Thank you, Jon.

14 Yeah, at this point, we have some time for
15 questions. So either I will answer them, or more than
16 likely, I'll get one of my experts to jump on the screen
17 here and answer questions.

18 CHAIR BRUCH: Excellent. Thank you again,
19 Christopher, Erin, Robert, Lori, and Jon for that NOP
20 update. I appreciate it. We'll open it up for board
21 questions.

22 Allison, go ahead. I see your hand.

23 VICE CHAIR JOHNSON: Chris, thanks so much for
24 being here and for bringing the whole team. It's just so
25 helpful to hear about all the different ways that NOP staff

1 are working to safeguard integrity and really helping the
2 program run smoothly.

3 I'm curious to hear more from you, Chris,
4 specifically about how your time working in specialty crops
5 is informing your approach to leading the NOP. And to the
6 extent that you interacted with the Fruit and Vegetable
7 Advisory Committee, whether there are any aspects of the way
8 that they function that we could learn from here at the
9 NOSB?

10 DEPUTY PURDY: Thanks for the question -- the
11 questions. My time at Specialty Crops Program was spent
12 interacting, working with the members of the fruit and
13 vegetable industry every day. I spent a lot of time
14 visiting their operations and major terminal markets like
15 the one in Hunts Point, New York, visiting their processing
16 plants. We worked with everyone from fresh fruits and
17 vegetables and nuts and other processed products, a lot of
18 domestic, a lot of imported products. Some of the
19 challenges are consistent with what the national organic --
20 or the, I'm sorry, organic producers are experiencing.

21 Competition. Competition from offshore locations
22 is a very significant concern amongst the domestic produce
23 industry here in the U.S. Rising input costs, local rules
24 and regulations making it challenging to run a business. I
25 think they're very consistent problems. But, you know,

1 across the board, the industry just is very, very involved.
2 Over the years, they have asked Congress to develop a number
3 of services to help them effectively sell the product and
4 compete.

5 Information services, market news, USDA's market
6 news, inspection services located throughout the country,
7 food safety audits, industry funded self-help programs.

8 In terms of the difference between the NOSB and
9 the Fruit and Vegetable Industry Advisory Committee,
10 hopefully there's none of my former colleagues on the phone,
11 but I -- I would say NOSB is more tightly focused on
12 problems and solutions. So, I think it's very clear what
13 some of the challenges you're wrestling with, some of the
14 petitions for the changes to the allowable list. So, I
15 think there's some ways that the industry -- Fruit and
16 Vegetable Industry Advisory Committee could learn from NOSB.
17 But, you know, similar interactions. Similar -- great to
18 hear directly from the industry.

19 CHAIR BRUCH: That's great to hear. We're excited
20 to have you here. Thank you.

21 CHAIR BRUCH: Thank you, Allison.

22 Brian, go ahead.

23 BD. MEM. CALDWELL: Yeah. Thanks, Amy.

24 Boy, just great presentations from your staff,
25 Chris. Really appreciate all the work on enforcement. And

1 we just heard that it's just -- you can't overstate how
2 important that is for both the organic farmers and
3 consumers. So.

4 Along with that, we've -- I believe I -- we saw
5 that we have 7,000 new operations -- new handling operations
6 under SOME, and that includes brokers and traders who now
7 are required to be certified organic.

8 And I wonder if you could please share how the NOP
9 accreditation team is working to ensure that the certifiers
10 accept new clients only when they have the capacity to
11 monitor them with inspectors and testing?

12 BD. MEM. DIMITRI: That's a multi-part question.

13 BD. MEM. CALDWELL: Yeah.

14 DEPUTY PURDY: I'm -- I think I'm going to throw
15 out a, what's it, a lifeline to my staff to help --

16 MR. YANG: Sure, Chris. I can --

17 DEPUTY PURDY: -- with that answer that. There
18 you go.

19 MR. YANG: Yeah. Appreciate the question about
20 certifier administrative capacity. I think that's a
21 technical term we as a program like to use, and our
22 certifiers are most familiar with. It's actually in the
23 regulations. But I believe I'm hearing the question is, is
24 how does the NOP verify certifier administrative capacity?

25 I can say that the administrative capacity is

1 clearly an area that the program assesses during all of our
2 periodical onsite accreditation audits. And then it's
3 something that we continue to verify through our desk review
4 activities because certifiers do continue to submit what we
5 call reinstatements. It's -- sometimes it's other paperwork
6 that they have to submit as part of a request for
7 information. And within that -- within that oversight
8 framework, what we're looking specifically at is whether the
9 certifier is not only maintaining adequate administrative
10 capacity, it's whether they're able to not only demonstrate
11 that they are providing or have provided, so past, have
12 provided, and then currently providing, and that they
13 continue to have that capacity to provide oversight to all
14 their certified operations.

15 And so for example, when we get down into
16 specifics, we're verifying whether the certifier has
17 conducted annual inspections of every single operation they
18 certify every year, right? And so when we conduct our
19 audits, not only are we looking at the past, we're looking
20 at the present. And then at the same time, again, we're
21 verifying whether they have the capacity to continue doing
22 their work. And some of that, again, involves looking at
23 how they process their applicants. Are they continuing --
24 do they continue to process the continuing certifications in
25 a timely manner? And then what we even take a look at is,

1 are they issuing noncompliance's and taking adverse actions
2 in both an appropriate and timely manner? And so when we
3 find that they're not demonstrating that sufficient
4 administrative capacity, we issue noncompliance's and we
5 require the certifiers to be able to demonstrate that
6 they're able to rectify the issues.

7 The other point I just wanted to, kind of, make is
8 on the education side of things. Over the past few years,
9 during our annual certifier training, we've stressed --
10 we've stressed to certifiers the importance of operating
11 within their administrative capacity. And we plan to
12 continue reinforcing this messaging going forward, too.

13 BD. MEM. CALDWELL: Yeah, thanks so much, Robert.
14 This is -- this is really such important work. We really
15 appreciate it.

16 MR. YANG: Thank you.

17 CHAIR BRUCH: Thanks, Brian. Thank you, Robert.
18 Nate Lewis, I see your hand. Go ahead.

19 SECRETARY LEWIS: Thanks, Amy.

20 Our nation's poultry producers have been
21 struggling with a recent outbreak of avian influenza, which
22 drove egg prices to historic highs. And I'm curious from
23 NOP staff on what -- how that outbreak has affected the
24 rollout and implementation of the Organic Livestock and
25 Poultry Standards final rule?

1 MS. HEALY: I can take that one. So, as a
2 reminder for the compliance dates, some requirements, the
3 compliance date had already started this year in January,
4 but existing layer and broiler operations have five years,
5 so until January 2029, for the outdoor space requirements.
6 So, we're not yet in full compliance for some of the
7 requirements. However, we're still working with certifiers
8 to ensure a smooth transition, and we don't anticipate any
9 issues. We recognize the severity and the impact of avian
10 flu, and we are following USDA's guidance and efforts.

11 Just as a reminder, operations should work with
12 their certifiers if they need to use temporary confinement,
13 and the method of temporary confinement must be approved by
14 the certifier. And we encourage operations and certifiers
15 to follow guidance from APHIS, so that's USDA's Animal and
16 Plant Health Inspection Service, as well as their state
17 agencies.

18 CHAIR BRUCH: Thanks, Nate, for that question.

19 Kyla, go ahead. I see your hand.

20 BD. MEM. SMITH: Yeah, thanks. I always enjoy the
21 NOP update so much. I always learn a ton. So, I have a
22 question about import certificates. So, does the NOP have
23 the same level of supply chain traceability for import
24 certificates that are issued by certifiers for products that
25 are being imported under an equivalence arrangement as the

1 68 percent? I believe that was the percentage on the slide
2 of the 68 percent of NOP import certificates that are issued
3 by USDA accredited certifiers?

4 MR. VELEY: Yeah. Kyla, great question. I can --
5 I can take that.

6 So, absolutely they do, number one. Let's cut to
7 the chase. When we rolled out SOE, even before, right, we
8 had to make sure that imports coming into the country,
9 regardless of if they're coming from a USDA-certified
10 operation or an equivalency arrangement operation, were the
11 same, and that's why we built out the Global Integrity
12 Module in OID. Anybody can go in there and take a look at
13 operations that are exporting to the United States. The
14 same information is required on an import certificate,
15 regardless of if it's a USDA accredited certifier or if it
16 falls under one of our equivalency arrangements.

17 If we have any questions on any of those, it's a
18 little bit different how we go backwards to the certifier.
19 Because if it's a -- obviously, if it's a USDA accredited
20 certifier, we can go directly back to them. If it falls
21 under an equivalency arrangement, we have to go back to the
22 host country or the partner country first, and then down to
23 the certifier or certified operation. So, the communication
24 channels are a little bit different, but the data elements
25 and what's required are the same. Great question.

1 BD. MEM. SMITH: Thank you. Appreciate it. K

2 CHAIR BRUCH: Excellent. Thank you, Kyla. Thank
3 you, Jon.

4 Dilip, I see your hand. Go ahead.

5 BD. MEM. NANDWANI: Thanks, Amy.

6 Like, Erin presented about organic toolkit, so my
7 question is if NOP or they have update on our stakeholders'
8 use of the organic marketing toolkit?

9 MS. HEALY: Yes. And I'm very excited that one of
10 the new board members, Andrea Hatziyannis, is trying to get
11 a pilot test going at Sprouts. So, fingers crossed. I'm
12 actually sending her some materials, hopefully this week,
13 and they'll start that pilot test and hopefully expand from
14 there. I've been talking to Amazon, and I continue to reach
15 out to the retailers on our list.

16 As I mentioned, there's the microlearning, so you
17 can find that in OILC if you'd like to forward something if
18 you happen to know of retailers or brands that you're
19 working with. I've also talked to Organic Valley, and they
20 have agreed to include some messages in their social media.
21 So, I continue to do what I can in the time that I have. We
22 don't have funding for it, so that's why I'm always urging
23 the community to please help us spread the word and get the
24 information out there. And if you -- even as a consumer in
25 a store, if you go in, you know, please ask them to post

1 some of the materials if you have a toolkit handy.

2 And the last thing I'll mention is OTA asked me to
3 join their Marketing Communications Council, so that will
4 start in May. That's their -- the first meeting I'm
5 joining, so I'll also be able to coordinate and collaborate
6 with some of the retailers on that council and see what we
7 can get going there, as well.

8 And thank you, Andrea, for your collaboration with
9 Sprouts.

10 BD. MEM. NANDWANI: Thank you, Erin. By the way,
11 it was a great presentation from you, as well as from other
12 members. Really appreciate it. Thank you.

13 MS. HEALY: Thank you.

14 CHAIR BRUCH: Excellent. Great question, Dilip.
15 And Andrea, thanks for your participation there. Erin,
16 thanks for that update.

17 Cat, I see your hand. Go ahead.

18 BD. MEM. McCLUSKEY: Great. Thanks, Amy.

19 Yeah, I second Dilip's gratefulness to the -- for
20 the presentations from the staff. Really appreciate all
21 your work and sharing this information out at the meeting.

22 In particular, I'm thankful for the information
23 about the top imports and countries of origin that you all
24 shared in the presentations. And I'm curious, based on the
25 data that you're gathering, can you share any information

1 specifically about organic seed imports that you might be
2 gathering, such as variety type or quantity?

3 MR. VELEY: Cat, I can help you with that import
4 question.

5 First of all, great -- great question. Kind of a
6 loaded question, right, when you're talking about seed
7 imports. The way we track all imports coming into the
8 United States are under a harmonized tariff code, the HTS
9 code, Harmonized Tariff Schedule code. So when we talk
10 about seed imports, right, it's really, are we talking about
11 for home gardening, you know, for peas to sow in the yard
12 and carrots? Are we talking about commercial corn
13 shipments? Organic corn shipments in 50-pound bags, right?
14 It's a big universe. So that's one big thing we have to
15 take a look at. Are we talking about small packages that
16 come in?

17 Overall, I can tell you, if you add up all the
18 seeds, right, we're -- this is, kind of, a mishmash without
19 looking at one individual commodity. Right now we're
20 running about \$17 million a year in organic seed imports,
21 right? We do have that within our purview of the data.
22 About 80 percent of imported organic seeds come out of
23 Canada, okay? That's where our -- our largest trader with
24 that. The rest come out of the Netherlands, Italy, and
25 China makes up about 1 percent, as well. Top seeds right

1 now overall coming into the country are peas, lentils,
2 alfalfa, red clover, and then everything else, kind of,
3 tapers off after that. So the data that we've been able to
4 amass within the last year because of SOE has been
5 phenomenal. And now, which is also a phenomenal task, is to
6 start to break down all this data. So I think we surpassed
7 it a year in March, right? We fully went into full
8 enforcement mode in September, so we continually are trying
9 to track these trends, understand the data, and all the
10 imports that we're getting right now. As we refine this, we
11 will get better and better and better at reporting out this
12 data, but great question on input.

13 BD. MEM. McCLUSKEY: Thanks, Jonathan. Appreciate
14 that.

15 MR. VELEY: Sure.

16 CHAIR BRUCH: Cat, thanks for the question.
17 Jonathan, thanks for that information.

18 Any other questions? Otherwise, I might jump in
19 here. I'm always known for a question or two.

20 But anyway, I do really appreciate the information
21 that was presented to us, especially in the areas of organic
22 oversight and enforcement. Very important areas for myself,
23 and I know there's so much more happening behind the scenes.
24 I really want to say thank you on that.

25 And this question potentially is, I don't know,

1 either for Lori or Jon, I'm assuming. You know, I really
2 appreciate the information on the African -- or the West
3 African Directive. I'm also, kind of, diving into import
4 data on a private arena, and from my point of view, it looks
5 like when we're looking at Q1 of 2025 versus Q1 of 2024, it
6 looks like we might be having a shift in where feedstuff --
7 organic feedstuff imports are coming from. And maybe
8 potentially even leaning more towards the Black Sea area; a
9 little bit less from West Africa, and potentially a little
10 bit more from the Black Sea area.

11 So, I was just kind of wondering, in general, if
12 you could talk about how the directive is sending direct and
13 indirect signals to the organic feedstuff import market?

14 MS. TATORA: I can take this one.

15 So first, let me just say, in my division, we love
16 data. So we use ACE data. We use data from certifiers. We
17 use data from folks like you. We use publicly available
18 data. We use mass data. Data, data, data. That's what we
19 use, right? So if we don't have data, we can't really
20 function. It was true before we had SOE, but with
21 everything that we can see now, with SOE and all the new
22 requirements, we really need that data to help us.

23 And in this case, you're right. The data shows us
24 that we are starting to see a drift away from West Africa
25 into the Baltic regions, into the Black Sea area. But it's

1 really early, right? So it's only been a couple of months
2 that that's been happening, so that could be an anomaly.
3 The war itself could change how things flow. We don't know
4 what will happen there. Maybe they close up the waterways
5 or put other restrictions on, and we would have no
6 indication of ahead of time. So right now, 100 percent
7 agree. That's what it looks like. We're doing a shift.

8 It looks like that little water in the baggie
9 analogy that we use a lot, right? Whenever we focus on an
10 area, we tend to see trade shift to another area, right?
11 So, the Black Sea area, we looked at -- when I first started
12 with NOP back about four years ago, we were looking at the
13 Black Sea pretty heavily, and then trade shifted. And then
14 we looked at India. Then we looked at other parts of the
15 world. And then we started looking at Turkey and West
16 Africa. Now we're, kind of, looking back towards the Black
17 Sea, because the bad guys are constantly moving. That's why
18 we like the data. And that's why we look at data everywhere
19 to, kind of, give us an idea. Because by the time you all
20 see, oh, something's happening, and either supply has
21 changed or your, you know, your customers are giving you
22 different information, it's just starting to happen, right?
23 So you've got to, kind of, marry up what you're hearing with
24 what we can see in the data to figure out what's actually
25 going on. And we actually spend quite a bit of time doing

1 that.

2 I'm going to read you some updates on the West
3 Africa Directive itself, because it's pretty detailed. And
4 I don't want to go off script and have my staff give me a
5 hard time, that I missed up -- messed up on anything, so I'm
6 going to read this section pretty in-depth, probably.

7 So the purpose of the directive was to assess the
8 legitimacy of increased volume of organic soy from the
9 region coming to the U.S. To this major compliance
10 initiative, the NOP is looking at certifier oversight,
11 learning about the soy supply chains and operations, because
12 it's very complex, and export quantities and destinations,
13 and then using that information, we're initiating
14 investigations. It's a pretty complicated; it's the most
15 complicated thing we've done since I've been here, and I
16 think that these types of investigations will become more
17 common as we get better at how -- how to actually use this
18 data and how to pull those threads, the financial threads,
19 the supplier chain threads, supplier distribution lanes, and
20 such.

21 The directive covers producers and handlers of
22 soy, soybeans, soy meal, and it operates in five West
23 African countries. We picked this area because we
24 determined it was a high risk area for organic fraud,
25 because past and ongoing compliance work involving

1 international livestock feed commodities just shows us
2 feedstocks are always high risk, because they're needed
3 everywhere, so there's always a deficit in what folks are
4 looking for around the globe. Stakeholders, particularly
5 domestic organic commodity growers, have expressed
6 significant concerns, farmers, about the production capacity
7 of that region relative to the volumes of soy imported from
8 West Africa. There's a lot of back and forth on that
9 particular topic.

10 So the Food and Agriculture Organization gives you
11 outputs that country's report themselves, so sometimes you
12 can look at that data, compare what we're seeing, compare
13 what the Foreign Agricultural Service has, but it's just
14 really hard to figure that out unless you have a significant
15 number of years of data that's consistent to look at. So we
16 used all that data to, kind of, try and figure some of this
17 out.

18 Spike in soy beans from West Africa since the end
19 of the India Recognition Agreement in 2021 was also a huge
20 stake for us, because that trade had to go somewhere. And
21 the legitimate trade probably had to find a different way to
22 get where it was going, but there was going to be an impact
23 there. So a comparison of the value of organic grains and
24 oil seeds imported directly from West Africa for Q2 over the
25 past three years shows a decrease for December 24th through

1 February 25th, which is what you were noticing, Amy. And
2 the value of West Africa imports dropped about 15 percent of
3 the total, down from 25 to 30 percent in prior years. This
4 does not, however, include soy from West Africa that is
5 imported into the U.S. through Canada. That's a little bit
6 more complicated to track.

7 There are eight certifiers that currently certify
8 soybean producers or handlers in the covered countries and
9 are impacted by this directive. NOP is focused initially on
10 exporters in West Africa. Exporters are higher risk
11 operations because of the potential for commingling of
12 products or product substitutions. So exporters at the port
13 trying to figure out how to fill up that container, how to
14 get the product moving, there's a lot of room for error
15 there, intentional or unintentional. So that's a
16 significant spot for us to look.

17 We're looking at whether certifiers have conducted
18 any unannounced inspections or sampling of residue testing,
19 adequacy of traceability, and mass balance exercises,
20 completeness of OSPs, and accuracy or completeness of OID
21 profiles. This information has revealed what operations are
22 supplying exporters and the destinations for exports of NOP
23 certified soy products, specifically whether it is going
24 directly to the U.S. or to Canada. The directive is in
25 place through December 2025. And at this time, CED is

1 compiling observations and findings about certifier
2 oversight, which may lead to meetings with certifiers and
3 noncompliance's.

4 Certifier reports for initial supply chain
5 traceability audits for specific soy shipments are due at
6 the end of April. We expect to have additional observations
7 about certifier oversight following review of that
8 information. This is pretty important to us, but we're also
9 trying to be mindful of the fact that the certifiers are
10 really overburdened and overwhelmed with all the new SOE
11 requirements. But we still have to make sure that we're
12 protecting the market, so we're doing our best to provide
13 enough runway for the certifiers to get their regular work
14 done, plus this work, but also for us all to protect the
15 market.

16 Here's a brief summary of our findings so far. We
17 are seeing ongoing shifts in soy certification activity in
18 the West Africa region and a downward trend in the overall
19 number of certified soy operations in the region. Ten
20 operations have been suspended and a further 30 voluntarily
21 exited the market. The West Africa -- so currently we have
22 a few issues with some of our data trying to keep everything
23 updated, and so some numbers are a little bit out of date,
24 so we're looking at data back to February. So there could
25 be some newer information that we just don't have yet, but

1 we hope to have that shortly. And just some other
2 international data that gets updated at the end of the
3 month. So we should be coming into another set of data that
4 could have a little bit of an impact there, but we'll keep
5 folks apprised of that as we go through this directive.

6 The NOP has initiated 16 targeted investigations
7 involving operations in West Africa soybean supply chains.
8 Ten of these investigations require sampling events. The
9 investigations span all levels of the supply chain,
10 including importers, and NOP has plans for additional
11 investigations. The majority of investigations are still in
12 progress; however, preliminary findings have resulted in
13 referrals to trade partner governments and certifier-issued
14 noncompliance's to importers and exporters.

15 And we'll continue to keep the community updated
16 on this very important work.

17 CHAIR BRUCH: Great. Thank you so much for going
18 into so much detail about what's happening with the West
19 Africa Directive and some more of the work that your
20 incredible team is doing, leaving no stone unturned. So I
21 appreciate that from a farmer point of view and from a
22 consumer point of view, as well. So thank you.

23 All right. I'm just looking for any other hands.
24 All right. I'm not seeing any.

25 Again, everybody, thank you so much for providing

1 us this well-researched information. It's good exchange
2 between the NOP and our board, and also for the community.
3 I'm thankful to have the collaboration here.

4 And I am looking at our agenda. We are slightly
5 ahead of schedule. We're up to a break right now. And on
6 the backside of the break is going to be our TOPP
7 presentation. So we're actually going to extend the break
8 just a little bit longer to make sure that participants in
9 TOPP are going to be able to join us. So I recommend that
10 we come back at five past the hour, and then we will begin
11 the second part of our meeting. Thank you. I think we'll
12 have a slide for that.

13 (Whereupon, a brief recess was taken.)

14 CHAIR BRUCH: All right, welcome back from on
15 break. As everybody's starting to come back online, I am
16 going to kick us off with our first Ice Breaker. And we're
17 going to pick five board members for this question, and
18 we'll catch the rest at another break, so be ready. The
19 question is -- and since we are a little bit ahead of time,
20 we'll try to do these exchanges occasionally.

21 So my first question that I'm going to be asking
22 is, could you highlight a -- something that was very
23 interesting or that that we need to elevate from what you've
24 heard from public comments? The oral public comment
25 webinars? So just a chance to highlight or elevate

1 something that was really interesting to you. And as I look
2 around the tiles, I'm going to kick us off with Kyla first,
3 then Brian, and then Nate.

4 Go ahead, Kyla.

5 BD. MEM. SMITH: Okay. The first thing that came
6 to my mind was I really enjoyed Gwendolyn's slide -- I did
7 take a screenshot of it, so Gwendolyn, you can invoice me
8 later -- regarding fraud. And in response to our residue
9 testing document that we're working on, so that was the
10 first thing that popped into my mind.

11 CHAIR BRUCH: Excellent. Thank you, Kyla.

12 Brian, go ahead, Nate, and then Kathryn. We're
13 going to call on Kathryn after that.

14 BD. MEM. CALDWELL: Well thanks, I think, Amy. In
15 terms of the virtual comments, I mean, the thing that came
16 to several of the of the farmer comments really showed that
17 the stress that they were under because of low prices. And
18 so, I mean, that's the thing that really just struck me hard
19 throughout the presentations.

20 CHAIR BRUCH: Thanks for elevating that, Brian.

21 Nate, go ahead.

22 SECRETARY LEWIS: No --

23 CHAIR BRUCH: Kathryn, and then Carolyn.

24 SECRETARY LEWIS: Yeah, I appreciate you putting
25 us on the spot, Amy. I think it's good for getting the

1 blood flowing. I was kind of amazed at how, it seemed like
2 at least the commenters I heard, all supported my opinion.
3 No, I'm just joking. I really was just going to comment on
4 the -- what I noticed was that there is actually a lot of
5 areas of consensus in the organic community and that we
6 vigorously debate our issues and our opinions and our
7 values. But a lot of that is, kind of, around the edges on
8 some sort of finer points. And in general, we are largely
9 supportive of the trajectory that we're moving in the
10 organic space. And I think that's reflected in the public
11 comments. So that's what really stood out to me.

12 CHAIR BRUCH: Sure, Nate. Well said.

13 Kathryn, and then Carolyn to wrap up this session
14 of the Icebreaker.

15 Go ahead, Kathryn.

16 BD. MEM. DESCHENES: Sure. So I was just struck
17 by the engagement. So, obviously, just getting my feet wet
18 so I appreciated the engagement from everyone and being able
19 to ask questions, yeah, where I wasn't quite clear. So I
20 appreciated being on this side.

21 CHAIR BRUCH: Excellent, Kathryn.

22 Okay, Carolyn.

23 BD. MEM. DIMITRI: I have two, but they're very
24 closely connected. So I was really moved by Alice's moment
25 of silence. And I was also touched by the great respect

1 that people have for the National Organic Program staff.
2 That was really overpower -- that was so powerful. And I
3 feel the NOP is so beloved. And it's just unusual to think
4 about a public-private partnership where there is this great
5 mutual respect in both directions, even despite, you know,
6 some serious differences like hydroponics, for example. The
7 affection is still there.

8 CHAIR BRUCH: Absolutely. Thank you, Carolyn, for
9 elevating that, as well.

10 And I guess I wouldn't do my role justice if I
11 wouldn't put people on the spot for these Icebreakers, so
12 stay tuned. But anyway, we are.

13 BD. MEM. PETREY: I was tardy. Could I say mine?

14 CHAIR BRUCH: Oh, yes, you can.

15 BD. MEM. PETREY: I'm sorry.

16 CHAIR BRUCH: Yeah.

17 BD. MEM. PETREY: I missed it.

18 CHAIR BRUCH: What -- how about, Logan? Yeah, you
19 go ahead, and then we're going to catch up with the others
20 at another break. So, Logan, I am --

21 BD. MEM. PETREY: Oh, okay.

22 CHAIR BRUCH: -- dying to hear what you have to
23 say.

24 BD. MEM. PETREY: So, I was tardy. I didn't know
25 if --

1 CHAIR BRUCH: No, go ahead.

2 BD. MEM. PETREY: -- you had gotten to me already,
3 or however. But I want to, you know, it's the first time
4 we've ever had to have a very strict deadline. And often we
5 go over because we have that ability. We have that
6 flexibility, but we didn't have it. And Amy, you did a
7 great job. You and Michelle, y'all did an excellent job at
8 keeping it on time. And still, I felt like things were
9 expressed. So.

10 CHAIR BRUCH: Excellent. Thank you so much,
11 Logan. And we would never forget you for sure. So thank
12 you for that Icebreaker moment.

13 I'm going to turn over the mic to Christopher
14 Purdy to introduce our Southwest Region Transition to
15 Organic Partnership Program lead. Go ahead, Christopher.

16 DEPUTY PURDY: Wonderful. Thank you.

17 Welcome, Jessy. I just -- before I talk about
18 your background a little bit more, I noticed you went to
19 Sarah Lawrence College in beautiful Bronxville, New York,
20 right outside of New York City. I know it well.

21 But welcome. Thanks for thanks for delivering
22 your presentation today. We look forward to it. Just
23 wanted to talk a little bit about your background. You're
24 the chief program officer of the California Certified
25 Organic Farmers Foundation, or CCOF. You lead the

1 discussion on the Transition to Organic Partnership Program,
2 TOPP. Accomplishments from the last year.

3 Jessy Beckett-Parr is the chief program officer at
4 the California Certified CCOF, as I mentioned. She has
5 15 -- over 15 years of project design and management
6 experience, and is dedicated to bringing teams together to
7 create positive change with extensive knowledge of
8 agriculture and food systems. Jessy holds a Master's in
9 Community Development from the University of California-
10 Davis, a Certificate in Ecological Horticulture from the
11 University of California-Santa Cruz, and as I mentioned,
12 from Sarah Lawrence College, a Bachelor of Arts degree.

13 Prior to joining CCOF, Jessy spent five years
14 producing a global documentary on soil and food systems,
15 "Symphony of the Soil." We may want to have that as a
16 mandatory viewing prior to our next meeting.

17 Thank you, Jessy. Welcome.

18 MS. BECKETT PARR: Thanks so much, Chris, and
19 thanks for having us.

20 Hello, National Organic Standards Board and NOP
21 staff and members of the public. Thank you so much for
22 creating the space to talk about the Transition to Organic
23 Partnership Program. And this is really an incredible
24 investment by the USDA in American farmers. So today I'm
25 going to give a brief overview of TOPP, the Transition to

1 Organic Partnerships Program. And you're going to be seeing
2 data from our 2024 Impact Report. If you're interested in
3 learning more than what you see today or what you hear
4 today, you can check out the TOPP website, which is
5 www.organictransitions.org. And right at the TOPP of that
6 page, you can see a little button that says Impact Report.
7 And you can really get deep into all of the change and
8 things that have happened over the last couple of years with
9 TOPP. Really exciting. And there's just a lot of stories
10 to tell. And you're going to hear today from farmers who
11 are contributing and benefiting from this program. Can you
12 change the slide, please?

13 So a little bit of background. You know, why
14 TOPP? Why the Transition to Organic Partnership Program?
15 The growth of domestic organic agriculture is both
16 desperately needed and a huge opportunity for American
17 farmers. There's increasing consumer demand. Most of us on
18 the call here do know that Americans want healthy organic
19 food to feed their families. Today, 82 plus percent of
20 American households demand organic. They buy organic, they
21 bring it home, they put it in their refrigerator.

22 There's also a lack of domestic supply. The U.S.
23 organic market is the world's largest. It's valued at over
24 \$70 billion. However, in 2024, the U.S. spent an estimated
25 \$8.9 billion on organic imports. That's \$8.9 billion that

1 should be kept here in the American economy. So this is a
2 missed opportunity because we know that organic supports
3 thriving rural communities. There's data that shows that
4 the organic sector creates jobs, contributes to local
5 economic development, and increases median household incomes
6 where organic businesses are located. And so the Transition
7 to Organic Partnership Program was built to capitalize on
8 this opportunity. How do we keep more of that organic
9 sector money here in the domestic economy? Next slide.

10 So we know that American farmers can close this
11 gap. You'll see on the right here, there's a chart of total
12 U.S. trade export/import when it comes to agriculture. And
13 you can see that for three consecutive years, the U.S. has
14 imported more agricultural commodities than it's exported.
15 And that's resulting in a trade deficit that hasn't been
16 seen in nearly 60 years. So we in the organic community
17 know that time, it's now to invest in American farmers so
18 they can choose to go organic, and both address this import
19 gap and reap those benefits of organic: cleaner air, soil,
20 water, healthy food and successful rural businesses. Next
21 slide.

22 So the Transition to Organic Partnerships Program
23 is the first national level investment in organic
24 transition. And before TOPP, there was a profound lack of
25 technical assistance and support for organic transition in

1 most areas of the country. Especially through the central
2 part of the country, if you were looking for organic
3 extension agents, if you were looking for organic technical
4 assistance, it was really hard to find. And you had to, a
5 lot of times, go out of state for that knowledge. But
6 today, because of TOPP, we have established and ground
7 truthed a unified support system for organic producers in
8 every single state in the country and select U.S.
9 territories.

10 On the right, we affectionately call this the
11 "Onion." This is our program scaffolding. So at its core,
12 we run a national farmer mentorship program that pays
13 farmers to help other farmers. There are hundreds of farmer
14 pairs in every state in the country. Farmers are paid to
15 mentor the next generation, so you're getting farmer-to-
16 farmer learning, which if anybody's studied agricultural
17 education, that's really the best way to educate anyone; is
18 by having somebody who has a very close learning style and
19 life experience mentor each other. We also provide on the
20 ground technical assistance through cooperative extension
21 and farmer centered organizations that are directly in the
22 communities that they serve. And we provide thousands of
23 farmer facing events every year that includes field days,
24 seminars, conferences and farm tours. And you'll learn a
25 little bit more about that in the coming presentation. Next

1 slide.

2 So we accomplish this work through a regional
3 network that's led by six organizations. You can see those
4 under the "Regional Lead" title, and three "National
5 "Partners." And then those regional leads coordinate with
6 farmers and organizations in their region to touch every
7 state and select U.S. territories. It's been such a
8 privilege to be running deep with these organizations. I've
9 quipped that in one side of the house, we're competitors,
10 right? We're industry competitors. And this other side of
11 the house, we are cooperating. There is this depth of
12 collaboration that's happening across the U.S. organic
13 movement that has not been seen since the writing of the
14 National Standards and the creation of the National Organic
15 Program decades ago. And I actually feel like it's in our
16 cellular DNA as organizations to collaborate and work
17 together towards this greater good.

18 So today we're going to review some more
19 statistics. Mostly they're from our recently published 2024
20 Impact Report. Again, you can see that on the TOPP website.
21 And I really want to call out and uplift Arizona State
22 University's Swette Center. They are the centralized
23 metrics and evaluation partner for all of the regions and
24 all of the sub partners. And it's really through their
25 system and coordination and collaboration across the whole

1 country that we have a unified data system, collection
2 system, and evaluation system. And they'll be on the call
3 later during the question and answer if there's specific
4 data related questions that people want to dig deeper into.
5 Next slide.

6 So, TOPP Program started in early 2023. Contracts
7 were signed in 2022. TOPP really, kind of, got off, started
8 to run down the track in early 2023. And over these first
9 two years, we've already demonstrated significant and
10 measurable impact in every region. Like I said, for
11 mentorship, we've connected hundreds of producers. We've
12 provided thousands of hours of technical assistance and
13 we've hosted over 1500 events that have reached tens of
14 thousands of producers and agricultural support
15 professionals. So rather than have just me talk about the
16 successes of TOPP, I could talk about them all day long,
17 very proud and excited to share with you all what's
18 happening, we thought it would be more helpful if you hear
19 directly from farmers who are impacted by this program. So
20 we have four farmers who are joining us today to talk about
21 their experience with TOPP, as well as one technical service
22 provider. And we're going to start first by hearing from
23 Jack Geiger and Chris Barnett, who are two farmers from
24 rural Kansas.

25 So I'll introduce Jack first. Jack is the owner

1 of Geiger Farms. He's a sixth generation Kansas family
2 farmer. And Jack's father survived the farm crisis in the
3 '80s by undertaking the transition to organic agriculture as
4 a survival strategy. And Jack took over management of the
5 farm when he was 16, and today he's a well-known organic
6 farmer and rancher in Kansas. He grows wheat, beef and
7 organic seed. And Jack is a current mentor for the TOPP
8 Program. If you've changed lives -- apologies, I kind of
9 jumped ahead there -- you can see a nice picture of Jack,
10 and I think his son. Pretty sure it's your son on the left.

11 And then Chris Barnett is of Running B Ranch.
12 He's a second generation beef cattle rancher and a first
13 generation organic farmer in southeast Kansas. And after
14 working in international wholesale food trade, Chris
15 returned to his mother's ranch. And his overarching goal is
16 to establish an organic system that enables them to raise
17 beef cattle on their own certified organic forage, hay and
18 grain. And he's currently managing 1600 acres with cattle,
19 row crop and hay meadows. And Chris is a current mentee in
20 the TOPP Program.

21 And I'm really excited to have you hear from both
22 Jack and Chris today. So I'm going to turn over the mic to
23 Jack first so you can tell us about your organic story and
24 what brought you to mentorship.

25 MR. GEIGER: So thank you, Jessy. As Jessy

1 introduced me, I'm Jack Geiger. So, I guess my story starts
2 out, my family came to Kansas pre-Civil War and where we
3 settled in Kansas is where Bleeding Kansas occurred on the
4 boundary between Missouri and Kansas. And so we have we
5 have deep roots in this part of America.

6 I'm one of six brothers, but I am a youngest son
7 of a youngest son, so in the tradition of German
8 agriculture, you know where that leaves me; kind of the low
9 end of the totem pole. I'm one of six brothers. And so
10 Jessy thinks that I'm this big landowner, but I have gone
11 out on my own and done things independent from my father's
12 operation.

13 So Dad started the transition in the '80s.
14 Basically, it was the -- we had a bad flood. You know, I
15 don't know the records, but I know that in the time -- in
16 the memories of the old timers, it was a historic flood, and
17 it wiped him clean and he was using production notes to
18 operate. And so the Farm Safety Net in 1984 was non-
19 existent, in effect, and so that precipitated the change to
20 an organic production model. And so that, kind of, informed
21 how I approach -- I, you know, it used to be common to say I
22 would be a low input producer, but that has been the focus
23 throughout my lifestyle, throughout my lifetime of farming.
24 And when organic came along, it seemed like a very
25 sympathetic production model.

1 You know, I went off to the university, got a
2 degree in agronomy, came back to the farm. Initially, the
3 first two years on the farm, I substitute taught, and so I
4 do have this -- I have a drive to teach, a love of teaching.
5 But at the same time, you know, teaching middle school
6 children on a substitute basis, I learned pretty quick like
7 that farming was actually more lucrative than teaching, and
8 it was less stressful. And so I became the full-time farmer
9 that I, you know, have been since that point in time.

10 In 2016, we started a YouTube channel and
11 initially the YouTube channel was the "How To" on organic
12 farming because there was this hole. Nobody was talking
13 about it on YouTube. YouTube was the how to, how do you go
14 to do something, and so it occurred to us to do that.
15 Through time, we have well over a million views. Over time,
16 it became a photo album of farm activity. And then my
17 latest iteration of the channel is I like to film
18 interesting things or farm life, if you will. But I feel,
19 you know, you reach a point in time where you think you've
20 said it all. And you feel like you want to grow beyond that
21 or do something different.

22 So anyway, when TOPP came along, I have always
23 taught and I've always interacted with my neighbors. I'm
24 involved in local government, et cetera, et cetera. But
25 when TOPP came along, it gave me a scaffolding, if you will,

1 to take mentoring to the next level. So before TOPP came
2 along, I was mentoring, give or take, five, six, seven guys
3 in various stages of the transition and some that have
4 completed the transition and are active producers. But TOPP
5 inspired me to do more. And so the reality is, is I am
6 currently mentoring about 14 people in various states of the
7 transition, three of them formally through TOPP.

8 Another thing that TOPP did that helped me
9 formalize -- and I only learned this after years of doing
10 this -- but rather than having the teacher-student
11 mentality. So when you try and teach somebody something, I
12 tell my guys that it's a two-way street. And so the irony
13 of teaching is that the teacher actually gets as much
14 benefit from the relationship as the student. And the
15 insights and the interaction that's involved in there, you
16 just -- they're just -- they're wonderful.

17 So there's another interaction that occurs, and
18 that's when you connect students to students. Because
19 students-to-students have a different approach and a
20 different -- they have -- they see things differently, and
21 so there's a huge benefit from connecting students to
22 students. And so I built a group.

23 Being a mentor through TOPP, I finally did
24 something that I have been swearing I would do for years,
25 and that was build a Google Drive with real simple agronomic

1 technical data, hands-on, easy to use, quick access. You
2 know, it's stuff that I have spent the last 20 years going
3 over the Internet and finding little technical manuals, like
4 one for how to do a gypsum recommendation. One for how to
5 do a lime recommendation. But it's basically agronomic
6 technical data and putting it all in one place. So it's
7 quick and it's easy to access. And so that you can go teach
8 yourself how to develop a soil recommendation for an input
9 on your farm.

10 The -- and the other thing that I've done is if
11 you've taught for an extended amount of time, the reality is
12 you get in this loop where you're answering the same
13 question. And so you have 100 people and they all ask you
14 the same question, and eventually you start to get burnout.
15 Every teacher needs to be renewed. And so through the TOPP,
16 and through, like, the Google Drive, and the technical data,
17 so I have become a better teacher, and I have actually sat
18 down, taken the time and focused answers to questions
19 because the reality is, is that, you know, our questions may
20 be different, but they fall into similar categories for
21 someone undertaking the transition. The questions are
22 actually very, very similar. How do I produce organically?
23 Where will I sell it organically? How do I need to think
24 about enriching my soil? How do I approach the input
25 questions? So you can, you know, target them, write them

1 down and, you know, half the time, how you ask a question
2 determines the answer you get. And so it's very important
3 that before you ask a question, you know, you understand a
4 little bit about where you're trying to get. So, you know,
5 you don't just go out and shoot your gun randomly; you try
6 and aim and try and figure out what the target is before you
7 even, you know, ask the question. And so in that -- in that
8 respect, it has been a huge blessing.

9 One of the ironies of my -- and this happened
10 before TOPP came along, is that I have attracted veterans to
11 myself. I don't know why. My family has a military
12 history, but I am not personally a veteran, even though I
13 have brothers who have served. But the reality is, is that
14 depopulation in our rural areas, it's occurring worldwide.
15 It's not just a Kansas phenomenon. It's not a U.S.
16 phenomena. It's going on worldwide. And so the struggle
17 with isolation and, you know, social concerns and the --
18 anybody who engages in the transition to organic, there may
19 be social stigma involved, as well. So we -- you know,
20 there's a biblical verse, teach a man to fish, feed him a
21 lifetime. And so anyway, trying to overcome some of that
22 isolation, and that ties back in with the original thing of
23 when students interact with each other, there is a blessing
24 that comes from that.

25 And so TOPP has been a wonderful, wonderful tool

1 and it has helped more people than you can imagine. And in
2 some ways, quite profoundly. So.

3 MS. BECKETT PARR: So thanks for that, Jack. I'm
4 seeing some hearts floating up and some spirit fingers.
5 That's the Zoom way of saying thank you. It's always
6 awkward to play to an audience that's silent. I'm sure you
7 would hear some clapping if we were all in a room together.
8 Thank you for sharing your experience.

9 I'm going to hand it over to Chris now to talk
10 about, kind of, the opposite side of the coin. Like you
11 said, mentorship is a two-way street, right? You're both
12 learning from each other. It's a collaborative effort.

13 So Chris, I would love to hear from you just about
14 your experience as somebody who's coming into the organic
15 scene.

16 MR. BARNETT: Yeah, can you hear me? (Audio
17 drop).

18 MS. BECKETT PARR: I can hear. You're a little
19 soft, but just make sure you speak up.

20 MR. BARNETT: Okay. Well, thank you. I
21 appreciate the opportunity to share (audio drop).

22 MS. BECKETT PARR: Wait, Chris, you're kind of
23 going out for a second. Let's see.

24 MR. BARNETT: Can you hear me?

25 MS. BECKETT PARR: Pause. I can hear you. Okay,

1 do you have something you can plug in?

2 MR. BARNETT: Is that better?

3 MS. BECKETT PARR: It's a little better. We're
4 getting like a, kind of, better. Why don't you try it again
5 and see how it goes.

6 MR. BARNETT: Okay, well, again, thank you for the
7 opportunity to speak with everyone today. My name is Chris
8 Barnett. I am (audio drop) first generation rancher. I'll
9 give you a little bit more background. Can you not hear me?

10 MS. BECKETT PARR: I can hear you. It's just,
11 kind of, like you are in a paper bag far away from the
12 phone. Just take a minute to like mess with your audio
13 settings and see if it works better.

14 And maybe Jack, while Chris is messing with his
15 audio settings, tell us how you first met Chris. How did
16 you all get connected?

17 MR. GEIGER: So Chris was seeking a mentor. I had
18 already --no, he applied first to the program, and I wasn't
19 sure that I was going to do it because I have a million
20 things going on in my life. I was already mentoring. And
21 can you take on more people? How much can a man do? You
22 know, you need to know your limits. And Brandon is --
23 Brandon, who is the coordinator for the plains region, he
24 said, "I got a guy I want you to meet." So the first time I
25 met Chris, I knew that he was a -- I would enjoy teaching

1 him and I would enjoy mentoring him. And, you know, very
2 soon after I -- the first time we talked, we talked for two
3 hours. And then shortly thereafter, even before he was in
4 the program, he came up and visited the farm. And when he
5 visited the farm and we were able to establish, you know, a
6 little bit of rapport, I -- I just knew that he would be a
7 good fit. Kansas farm boy. Lots of -- lots of roots in
8 Kansas. And Chris was a no-brainer. I -- I -- and I've got
9 a couple of others, and a couple of others that stress me a
10 little bit more for one reason or another, either
11 geographically because they're farther away or because of
12 their production models. You know, I have a -- Chris loves
13 cattle. He's from a ranch. He loves cattle. And so, you
14 know, I'm from the part of Kansas that is basically corn-
15 soybean country and the cattle have left the country, in
16 effect, because it's more profitable to row crop. But I
17 have a strong kinship with Chris because he loves cows and
18 he's from a part of Kansas where cattle production and crop
19 production go hand in hand. And I do have a bias as an
20 organic producer in that I think that an organic operation
21 needs a livestock component. And so --

22 MS. BECKETT PARR: Absolutely.

23 MR. GEIGER: Yes.

24 MS. BECKETT PARR: A hundred percent. Yeah. And
25 Jack, you know what you're talking about, too, is just that

1 it's a really intimate experience to have a mentor-mentee
2 relationship and it takes a ton of time and effort to match
3 people up. You know, some mentors only want to speak on the
4 landline and are still using fax machines. Some mentees
5 only want to speak by text message. There's geography to
6 consider. There's language to consider. And so it's
7 really -- it's an intensive experience, like having people
8 come into the mentorship program and then figuring out how
9 to match them. The Excel spreadsheets of people and what
10 they need and who can be matched with them are really deep
11 and intense and happening across the country.

12 Okay, so I see that Chris dropped off. Michelle
13 or -- I'm looking at Michelle or Andrea from NOP; can you
14 help him get back on? And I'm happy to jump ahead and then
15 we can come back to his story.

16 So I think that would be good. Why don't we jump
17 ahead? We're going to go to the next slide. We're going to
18 go to the next -- we're going to go to Slide 9, whoever's
19 controlling the slides. I'm not the human who's controlling
20 them. And then we're going to bring on -- thank you.

21 Yeah, so like I was saying before, TOPP is growing
22 the American organic ecosystem. So this is the total number
23 of mentors and mentees who were appropriately matched and
24 then had relationships in 2024. So we had 237 mentors and
25 we had 327 mentees just for 2024. And those numbers, kind

1 of, vary a bit. And the program has built up over time. So
2 more people are coming into the mentorship program over
3 time. You can go to the next slide.

4 And you can also highlight Bob Whitney, who is one
5 of the presenters today. So I'm going to turn to another
6 core aspect of the program, which is technical assistance.
7 And like you saw in that nested graphic of the different
8 elements of TOPP, technical assistance is, you know, folks
9 who are agronomic experts or organic paperwork experts or
10 folks who can help people at various parts of their
11 transition. And one of the folks that I've really enjoyed
12 getting to meet and learn from is Bob Whitney.

13 So Bob Whitney is the Texas A&M AgriLife Extension
14 Organic Program Specialist. He's worked for Texas A&M for
15 over 40 years, and he currently conducts research and
16 extension programs to improve organic production across
17 Texas. So he coordinates with a very large extension
18 service, if you understand public extension, that's housed
19 in the university systems, right, and usually they have
20 county agents that are across Texas. And if you've ever
21 been to Texas, it's big, folks. Whenever I'm talking to
22 Bob, he's on like an eight-hour drive somewhere. He's in
23 coordination and in communication with people across the
24 Lone Star State. And he's also the Transition to Organic
25 Partnership Program state lead for Texas.

1 So he's on the line and you can bring him up as a
2 presenter. I'll let you take it away, Bob.

3 MR. WHITNEY: All right. Great. Can you hear me?

4 MS. BECKETT PARR: Yes, we can hear you fine.
5 Thank you.

6 MR. WHITNEY: All right. Super. Take a look at
7 this photo here. That's one of our mentees. That's his
8 farm. Just got certified this past year, Jessy. Just make
9 sure you know that.

10 MS. BECKETT PARR: It's working, Bob. It's
11 working.

12 MR. WHITNEY: Yeah, there you go. It's working.
13 I love it. Okay, next slide.

14 Texas is a big state. I use this in all of my
15 programs as I'm talking about organic production. And
16 usually I've got this, along with several TOPP slides so we
17 can talk about that program. But we're talking about 16
18 hours from the top of the state where we've got a lot of our
19 dairy industry located and in some big farms. And in fact,
20 I'm talking about cattle in the top area there, there's a
21 historic Texas ranch, 37,000 acres, 1,000 -- cows that
22 converted to organic several years ago, and it's fantastic
23 to see them participate.

24 And then you go all the way down to the valley.
25 That's a 16-hour drive to get there. And you can see

1 there's about 6,000 acres of organic production there, and
2 that continues to grow. In fact, I just visited a couple of
3 days ago with a new citrus grower putting in 300 acres of
4 organic. So it's a -- it's great to see these people. And
5 I've already matched him up with a mentor.

6 Then we can go all the way to the east side of
7 Texas, right up next to Arkansas. And that's Belltown
8 Farms. And initially met with them two years ago about
9 getting into production, and talked to them about all the
10 issues they're going to face in damp east Texas. And got
11 them established. And then it's a 16-hour drive out to the
12 alfalfa fields that are located out in Hudson County, El
13 Paso County, that sort of thing.

14 We have -- a majority of our producers, you can
15 see all the numbers in what we call the south plains all the
16 way up through the high plains, and that's where the
17 majority of our production is. And so it's a big state.
18 But I would call your attention to something that really's
19 not necessarily TOPP related, but you see that long border
20 there with Mexico. There is a tremendous amount of your
21 produce that moves through that border. In fact, if you'll
22 focus on the bottom part of the state of Texas, there is, of
23 course, organic vegetable production in the Rio Grande
24 Valley. But there's 610 handlers in the state of Texas, and
25 100 of them are situated in that little area down there as

1 produce moves in and out of -- and I should say commodities
2 move in and out of the U.S. into Mexico, which is one of our
3 largest organic trading partners. So anyway, next slide.

4 It's a lot of fun to work here. A lot of driving
5 time. I get to talk to Jessy a lot. So then this is just
6 some of the commodities and the farmers that participate in
7 them. Of course, you're going to have farmers that do
8 cotton and wheat, that sort of thing. But we do have a lot
9 of row crops. That's my main job, is working with row crops
10 and row crop producers in the organic program. 448
11 certified, and that goes up and down. You could check me
12 out today and say, well, that's a little bit off. But
13 anyway, it's been good to see it grow. Let me -- when I
14 came in this position, 339. So in just the last four years,
15 we've grown tremendously.

16 And in fact, I was doing some economic numbers
17 because I work a lot on economics, as well, and we've gone
18 from 9.39 million to 1.41 billion, so pretty good increase
19 in -- in sales in the last few years. And we -- we're
20 selling high value row crops, as you can look at it. Cotton
21 and peanuts were significantly above the conventional
22 prices. But our biggest industry by far is our organic
23 dairy industry. And kind of exciting. We may have our
24 first new organic dairy coming in. So anyway, we'll see how
25 that turns out. But you could --you got to look at some of

1 the crops there.

2 I will say we did add a new one. Jessy helped me
3 with that through the TOPP program. We've added three new
4 transition grape growers. We're up to 400 acres of organic
5 grapes that are going to come into the program. That's kind
6 of neat to see. So we didn't -- I didn't add that onto this
7 chart, but maybe because I want to call attention to it.
8 We're pretty excited about that. Next slide.

9 There's -- it's big. We have 88 counties with --
10 in Texas with organic farms. 87,700 square miles associated
11 with that. And when you look at the numbers, we're looking
12 at 585,000 acres of certified farmland currently. And
13 probably in the range of another 100,000 that will be coming
14 in soon. If everything goes right, and we can keep our
15 markets going, that's -- that's been the struggle there.

16 Ninety-seven Texas A&M AgriLife Extension
17 specialists and researchers are involved with me in this.
18 They don't carry the title of organic specialist or organic
19 researcher, but they're quite involved. In fact, as soon as
20 I hang up with you, I'm on a committee meeting about an
21 organic sorghum project that has been funded, and we're
22 bringing some new transition growers into that project. I
23 like to get my transition growers involved in these organic
24 programs -- I mean, organic projects, organic grants as
25 quickly as possible. They love that. They love to see the

1 data that we generate from those things.

2 This 88 Texas County Extension agents, they've
3 been contacted by the farmers there in their counties about
4 organic. Fortunately, with the 12 regions, the 12 districts
5 that we've got in the state of Texas, I have a chance to
6 talk to all county agents, all 254 counties, and the staffs
7 in those counties about organic on a regular basis. I'm
8 invited by administrators to be a part of those programs to
9 talk to those extension agents. Those extension agents then
10 can share information about me or about our program and talk
11 about the -- basically, about TOPP because they're going to
12 be pushing people into the TOPP program.

13 And then two, we've had some training programs for
14 those extension agents to tell them a little bit about
15 organic and help them with that sort of thing. So, anyway,
16 we've -- we're trying to do a lot of outreach. We've got a
17 big system. And I'll just say that, you know, the TOPP
18 program has -- it's the vehicle for reaching out to Texas
19 about organic. That -- go to the next slide.

20 I'm going to give you a quote that I gave to
21 Jessy, and she just -- I think she was taken aback and then
22 she laughed. I said, Jessy, the TOPP program got me in the
23 middle of this hassle. It is a hassle, okay? But the
24 hassle is only served to a larger organic family. It's been
25 a lot of fun. It's been a lot of stuff to do, a lot of

1 things going on. We've got lots of farmer mentors. We've
2 done lots of farm tours and field days. And I -- I
3 regularly present 75 different programs about organic. And
4 whether I'm talking specifically about TOPP, or talking
5 specifically about organic, both of them get mentioned in
6 everything that we do. I do lots and lots of media and lots
7 and lots of newsletters, both mailed. I'm old-fashioned. I
8 think farmers like to get them. They like to ride the
9 tractor and read them. As well as, email newsletters. So
10 that they've got -- we've got lots of technical assistance
11 available, too. Lots of things I've written that they can
12 have in their hands. And then you see this here about the
13 podcast. So, we've got a huge network within Texas A&M that
14 can help move people into this program.

15 And the TOPP grant, the TOPP assistance, the TOPP,
16 whatever we want to call this, has been a big part of
17 helping me to put the resources to be able to work with
18 these TOPP producers. I've made a little note here; I don't
19 know how many mentors I have. Because of TOPP, I've been
20 able to develop a lot of resources that have been used by
21 both transition growers, but organic growers. Those organic
22 growers will get a request or conversation or sitting in
23 church and talking about organic, and they say, "Well, just
24 call Bob and he's got some information he can share with you
25 about where to buy organic sorghum and how to plant it and

1 that sort of thing." That producer calls me and we talk
2 about it. I say, "Well, we'd like to sign you up in the
3 TOPP program." "Okay, that's great. Put my name down." I
4 can put their name down. They're not interested in being
5 necessarily involved with me, you know, as a close
6 relationship, they just needed some help. They're back on.
7 I say, "Well, who are you talking to?" "Oh, it's Carl
8 Pepper." He's my friend. He's my neighbor. Carl's been in
9 organic for 30 years. And Carl won't sign up to be a
10 mentor. You know, so I make a comment, I don't know how
11 many mentors I've got, but there's a lot of them out there.
12 We can talk about having, you know, 10 or 20 or whatever,
13 but there's a lot of people out there. When you have a
14 program that's available like this, you can do a lot of
15 things that you don't necessarily think too much about.
16 Next slide.

17 I've got to keep going here. I'm -- Jessy's going
18 to be hollering at me here in a minute. I -- I'm going to
19 finish it up here by saying, I mean, you can look at the
20 numbers there. We've had a lot of hosted events for -- you
21 know, with things that include 300 producers all the way
22 down to three producers. If somebody calls, we try and go
23 to an event. We try and do things where we can tell people
24 about the TOPP program. TOPP has provided us with the
25 ability to be able to do those things. I -- when I

1 mentioned that hassle a while ago, when I first got in this
2 job, and I've been working organic a long time, but when I
3 first got in this job, I turned down things because I needed
4 to stay working just with my organic producers, and I was
5 missing some opportunities. And then Jessy turned my head
6 around and said, "No, you need to look at those people as a
7 resource, as future family members." And so, it has worked
8 that way. I don't mind that hassle. And so these kinds of
9 events that you're seeing here have allowed me to be able to
10 do that when I didn't think I could do that. And so I'm
11 very pleased with that.

12 So there's many, many, many transition growers
13 or -- we just don't necessarily know throughout the U.S. how
14 many of them may be bypassing this system, but this system
15 is actually starting to capture. I tell Jessy this; we're
16 starting to see things get captured in this. They're
17 getting caught up in this system that we've developed. And
18 I -- I said the other day, this needs to keep going. I
19 would have probably said, oh, I'll be glad when this is over
20 with, when it started, but I have enjoyed the ability to be
21 able to bring these growers in, to spend the time with them
22 that is -- has not been available in the past and wasn't
23 necessarily worthwhile, meaning that there wasn't much value
24 put on it because, well, you know, if somebody's
25 transitioned, they're probably not going to end up being

1 certified anyway. We lose so many of them, but TOPP has
2 allowed us to do that. And I'm so appreciative of that, and
3 I wanted to make sure you knew that before I got off of
4 here.

5 Jessy, anything I'm missing?

6 MS. BECKETT PARR: You're doing great, Bob. We'll
7 save the rest for Q&A. So I saw a lot of hearts and thumbs
8 up and, yeah, uplifting the sentiment of we need to keep
9 this thing going. You know, how --

10 MR. WHITNEY: We do.

11 MS. BECKETT PARR: -- do we keep it going?

12 So I'm going to -- we're going to hold on Q&A.
13 Logan, I see your hand up, and we're just going to hold
14 because I want to be mindful of time. I'm like, whoof,
15 really try to keep on schedule. But Logan, hold your
16 question, and we'll make sure the panelists are on at the
17 end of the presentation. We'll save questions for that.

18 So we got Chris back on the line. Thank you, Bob.
19 Stay tuned for Q&A. It sounds like people want to talk to
20 you about Texas. I always want to talk about Texas. It's
21 been a fascinating ride to learn from you. So let's go back
22 to Chris. You can drop the slides; NOP folks that have the
23 slides.

24 And we've got Chris, again. So if you're just
25 joining us, Chris Barnett is a TOPP mentee, and he's a

1 rancher farmer from rural Texas, and he's growing right now
2 on 1,600 acres. So Chris, thanks for rejoining us on your
3 phone.

4 MR. BARNETT: Can you hear me?

5 MS. BECKETT PARR: Oh, my God, like a radio. It's
6 amazing. You sound fabulous. I'm really glad we didn't go
7 with the earlier version because I was just like, oh, I want
8 to hear your story, but I can't hear you. So thanks --

9 MR. BARNETT: Apologize for --

10 MS. BECKETT PARR: -- for being back.

11 MR. BARNETT: -- technical difficulties. Okay.
12 So --

13 MS. BECKETT PARR: There's always technical
14 difficulties. No problem.

15 MR. BARNETT: Well, I'll start by saying thank
16 you, and I appreciate the opportunity to speak to everyone
17 today.

18 As was mentioned, I am a second-generation
19 rancher. I grew up on a family ranch. It was started as a
20 hobby by my stepfather back in the late '80s, and then built
21 up by my mother throughout the years to over 2,000 acres
22 with roughly 700 head. It's a cow-calf operation. The -- a
23 couple years ago, my stepfather began rapidly declining with
24 Alzheimer's. My mother -- I went back to help with a
25 roundup and realized how much things were declining, the

1 management of the ranch, and she just kind of lost all of
2 her motivation.

3 I had been working in the international food
4 trade, exporting foodstuffs to the Middle East and GCC, so
5 working with technical, you know, certifications already
6 there, and -- and learning, you know, what consumers valued,
7 the attributes of how food is raised. You know, obviously,
8 we all know consumers are becoming more aware and educated,
9 so it matters what we're doing here on the farms and
10 ranches. So just being, you know -- becoming more conscious
11 of that, and working on my mom to transition to organic for
12 years, finally she gave me the go-ahead.

13 So last year, I -- around the same time that she
14 gave me the go-ahead was when the Biden administration
15 announced funding to a organic program. And so I started
16 bird-dogging this program, found Brandon, and got connected.
17 He connected me with Jack last year and immediately hit the
18 ground running with Jack.

19 Working with him, having a mentor, a farmer -- so
20 let me a back step. I set out a goal to transition 150
21 acres to row crop farming of our 1,600 -- now 1,600 acres.
22 We've got a 560 acre native prairie field that we free-
23 range. Have been. My mom was free ranging the cattle on.
24 We're moving that into a more intensive grazing management.
25 And we burnt 500 acres this -- prescribed burn this season.

1 We've been mowing. You know, practicing organic standards
2 or practices for years. We haven't put chemicals on our
3 land, not even fertilizers. And then we like to raise our
4 cattle peacefully and not stress them, you know, if we
5 don't -- if we can help it. You know, so -- it's -- we've
6 been practicing organic, you know, systems for years, but we
7 wanted to start to capture the market value of that. And so
8 that's where I -- you know, that's how I got into TOPP. You
9 know, just Google searched it and, you know, looking for
10 support to transition those -- that acreage and get into,
11 you know, that organic market. But that's -- that's where
12 that started.

13 But working with Jack, he was -- he's like -- I
14 call him a field professor. He's an agronomist. He knows
15 what's happening and so, you know, what's going on. And
16 he's a very good teacher. And having that resource, I could
17 reach out to him day and night. He would answer every call
18 no matter what he was doing. And I think all the farmers on
19 the phone know, you know, what that would take. But he's
20 very accessible. And getting that -- having that real time
21 access, you know, as I'm in the field and encountering
22 challenges, you know, it -- it's not learning as an
23 application as much as, you know, I'm learning as I go.
24 And, you know, I -- this is all new for me.

25 So the advancement, I have -- I have winter wheat

1 in the ground and it's looking very good. I'm excited for
2 the harvest coming up here in the next, you know, five
3 weeks. And I -- I attribute to having that in the ground
4 right now to being able to work with Jack. You know,
5 I've -- I've accomplished a great deal in the last 12 months
6 that no doubt would have taken years.

7 We have one annual, you know, one growth season
8 annually, you know. And I -- I've just been trying to get
9 as much done on that 1,600 acres where we've got 500 acres
10 hay meadows, we're revitalizing that. You know, we've got
11 the forage. And then we've got the row crops now. So as I
12 mentioned, I have half of that row -- that 150 plowed and
13 planted into wheat. The other half is getting plowed in the
14 next month, I'm going to start plowing that. I've been
15 waiting for the rains to -- the heavy rains that we get in
16 southeast Kansas to come through as much as I can before I
17 go and till.

18 But you know, we've got -- working with NRCS.
19 We've got some assistance coming in this year for cover
20 cropping. They've been great. I know, you know, the
21 federal programs are on hold, but we just signed a contract
22 last week with our local office. They're very -- they knew
23 nothing of Organic A23, nothing, but we've been able to work
24 with them and they've learned. They've -- they went out and
25 educated themselves and are more than willing to facilitate

1 for us to continue our -- on this path with our new
2 practices. They're new to them, but again, they've been
3 very helpful.

4 So but the mentor-mentee situation that Jack set
5 up for us, I've got a lot of other fellow mentees that I can
6 call on. Having that real-time access to knowledge, I think
7 is key. You know, farmers tend to protect, you know, the
8 trade secrets, like grandma's, you know, recipes. They
9 don't -- you know, and they want to see what you're going to
10 do, you know. They're very interested. That's one thing
11 I've noticed. All of my neighbors are watching what I'm
12 doing. And it -- it's kind of wild. Even -- I'm hearing
13 farmers talking about our organic wheat and how well it
14 looks. And, you know, at first they were like, well, you're
15 going to do -- you're growing organic? Well, good luck,
16 you're not going to grow anything. And -- and now they
17 are -- they're paying attention.

18 I bought a plow from an old-time farmer. He's
19 farming over 20,000 acres. He has well surpassed his 50
20 harvests -- lifetime harvests. And he's -- they're no-till
21 farmers, 20,000-plus acres, and when I picked up the plow, I
22 got to -- I made a new friend and we stay in contact. And
23 something he has said to me is that I want to do what you're
24 doing and be a better steward of the soil. And so it's --
25 everybody's watching, you know, and -- and having the

1 successes by working through -- working with Jack and having
2 outstanding looking organic wheat growing in the field right
3 now, right next to the road, where they're all apparently
4 driving by, you know, watching it, I think it's having a
5 major impact. You know, not just on me and our systems, but
6 the neighbors are watching. And I feel it's going -- it's
7 going to really, you know, give a lot of -- build a lot of
8 confidence in our communities, as well, in those
9 conventional farmers who are wanting to be better stewards,
10 so -- and move into an organic system. So.

11 I don't want to take too much time, Jessy. I know
12 you waited on me, but did I cover everything?

13 MS. BECKETT PARR: You rocked it, Chris. There
14 were lots of hearts there. I can see from people's faces
15 who are highlighted. Like, we're just moved by your story.
16 You're rocking it. You took a lot on. Like, 1,600 acres
17 with a diversified system is no joke. And it's really
18 awesome to hear about your conventional farm neighbors that
19 are already practicing good soil stewardship through no-till
20 who want to go the next -- the next step, right, which is
21 eliminating synthetics.

22 MR. BARNETT: And hopefully --

23 MS. BECKETT PARR: Huge.

24 MR. BARNETT: -- it can be done. You know, I'm
25 building that confidence there, you know.

1 MS. BECKETT PARR: Yeah you are. Yes, you are.

2 MR. BARNETT: Kind of the hard way, you know. To
3 where the "I told you so." Because I got Jack, makes -- it
4 is successful. And it's -- I've got to do what I'm told.

5 MS. BECKETT PARR: It's awesome. Yes. You are an
6 awesome example of how mentorship can really help you take
7 that leap and do some pretty bold things in the first couple
8 of years. So, thank you so much. And we're going to move
9 along, but stay on for Q&A because I think people might want
10 to ask you about your operation.

11 MR. BARNETT: Oh, great. Thank you again for the
12 opportunity.

13 MS. BECKETT PARR: Yeah.

14 So, you know, just to, kind of, highlight more of
15 the statistics that I was talking about earlier, these are
16 all from our 2024 Impact Report. So, in 2024 across the
17 U.S., we had over 2,225 technical assistance engagements.
18 Some of those engagements are short. Brief. Like a couple
19 of phone calls or text with a producer, a bunch of emails,
20 you go back and forth. And some of those are long. Like,
21 we spent 20 hours supporting you writing an OSD and we were
22 at your farm for the whole time. So just think about
23 there's, like, scales of interaction there.

24 And then on the right, you can see all the
25 resources that we're creating. So again, this is partners

1 across the country and we've got presentations and new
2 websites that are going up and webinars and podcasts and
3 curriculum. And again, you can see all of that. The
4 resources are searchable by function, by what they are, by
5 what type of crop, what type of region, and it's all on the
6 www.organictransitions.org website.

7 We're going to move along and I'm going to
8 introduce -- you can change the slide. I'm going to
9 introduce Marguerite McClintock.

10 So Marguerite is a self-educated organic farmer
11 and she runs Alchemy Farms and Plants, which is an urban
12 organic farm in Huntsville, Alabama. And her farm was first
13 certified in 2013.

14 In addition to farming, she and her son are also
15 leaders in agriculture. They raise bees and they put on the
16 annual Alabama Honey Festival. And when I talked to her
17 last week on Zoom to prep for this call, she had a
18 microscope in front of her and she was inseminating queen
19 bees and I was, like, "That's just so hardcore. Thank you
20 so much for being on the Zoom call with your microscope."

21 And in addition to farming, she also serves on the
22 board for the Alabama Sustainable Agriculture Network, and
23 she's the outgoing president of the Gulf Coast Sheep
24 Breeders Association. And Marguerite is a TOPP mentor in
25 Alabama. So Marguerite's going to talk to us a little bit

1 about her organic journey and also what she brings to the
2 table as a TOPP mentor.

3 So take it away, Marguerite.

4 MS. McCLINTOCK: Thanks, Jessy.

5 I've got to tell you, I'm glad I got to go towards
6 the end because it's like I was writing notes from everybody
7 and I was like, oh my gosh, these people are like -- are
8 amazing, you know. So compared to everybody else, even
9 though I've been a mentor and been in organic farms since
10 2013, I feel like I never stop learning, you know. So, but
11 anyway, thank you for the opportunity.

12 And like Jessy said, I do -- I am from Huntsville,
13 Alabama and I do have a small urban crop, a specialty crop
14 farm. I've actually lived in quite a few places and landed
15 in -- I come from a family of scientists. Of all things,
16 they actually happen to work with DuPont, so they're on the
17 total opposite spectrum -- I didn't tell you that, Jessy --
18 for organic farming. But in my family, I'm known as the
19 oddball. But actually, the funny thing is now everybody's
20 come around because they understand what it really needs to
21 be organic, you know. They think it's just chemical free.
22 I'm like, no, it's beyond that.

23 But anyway, so I wrote some notes, but I do want
24 to let you guys to know that one of the reasons why I got on
25 is, I am a huge proponent of Alabama. I really think our

1 state is really primed for this type of agriculture. Right
2 now, we have predominantly a lot of small organic -- anybody
3 that's a small organic farm, they don't feel like they
4 really need to be certified because they're selling locally,
5 and so the public is more -- the market is more of a
6 local -- it's more of a -- down in the South, we're more of
7 we know you, I know you, and, you know, your word is my
8 word. But we do have a lot of large row crops.

9 I'm going to divulge a little bit from my original
10 script that you had there, but when I was looking up stuff,
11 I was really surprised because like I said, I was certified
12 in 2013. I was one of the first few. And I realized that
13 in 2024, in Alabama, we had 62,777 farmers, of which only
14 24 -- 24 were certified organic. And 15 -- that was up from
15 2017, which was 15, which was even more than when I started
16 in 2013. And the predominant age was 58 and a half years,
17 so I thought, well, this is good. I'm still a little bit
18 younger, below average, so I still have another half a year
19 to go before I become part of the statistics. And so it is
20 very important to continue with education and getting the
21 next generation involved in what TOPP does, right?

22 So one of the things that was really cool was, as
23 you -- as I told you, I got involved in organic farming
24 because it was something good that came out of something
25 bad. I was involved because of a scam that happened with a

1 guy who came around selling the organic system, selling
2 tomatoes. And if anybody is from Alabama, they probably
3 still remember it because it was all over the news. So the
4 long story short is, in all honesty, if TOPP had been around
5 at that time, it probably would not have happened because
6 people would have been more educated.

7 I mean, I have been growing. I consider my farm
8 to be really an oversized homestead. And what we do really
9 is based on making efficiency in our organic growing, right?
10 And finding that what -- of course, obviously, one of the
11 first things that happened when I joined this guy was, hey,
12 you said we were going to become organic, but nothing's
13 happening, so I don't sit around to do things, and I went
14 ahead and I became one of the first organic growers because
15 I had to write my own OSP. In fact, I even helped him write
16 his OSP so he got certified, too. That was again done with
17 a Florida certifier from Ameristar. And I love that group.
18 And I love the -- the group that's coming out of Florida
19 that's happening, too.

20 At the time when I was mentoring, it never
21 occurred to me. I think Bob just said that he had somebody
22 who was helping mentor and he didn't want to be part of the
23 TOPP Program. I can understand that because I've also
24 helped to be a mentor, and I don't really require -- like,
25 well, why do I need to be part of a project? But now when I

1 think about it, it really is actually nice to be part of a
2 very large network that helps to put some value to the
3 infrastructure that we're trying to create. It gives some,
4 lack of better word, credentials, credibility, puts you in
5 touch with other people.

6 I had the same problem that Jack was mentioning
7 too. In fact, that's one of the first things I did was I
8 said, okay, I'm only going to do one. One mentor [sic].
9 Then it became two, then three, then four. The fourth one,
10 actually, unfortunately, by the time we got to him, he had
11 already done things that were -- that he would be barred
12 from having a certification, so he had to back up to get
13 things done. So but honestly, if there had been a mentor
14 from TOPP at that time, before he made his decisions on how
15 to place his infrastructure, he probably wouldn't have had
16 that issue. So TOPP is really important, I think, as far as
17 getting that news out there so people go, oh, we need help.
18 This is where we can go to. I mean, thank goodness we have
19 Google now, right? But still, it's important to be able to
20 have -- to be able to have that out there for you.

21 One of the things that I saw that was really
22 interesting was when we talk about certifications, and I
23 know you talked to someone from Kansas and someone from
24 Texas and another farmer's coming up from Maine; it really
25 is important what you guys are doing, or just even having

1 infrastructure for our organic program because -- own
2 region. Because there's no one correct answer on how to
3 grow something and how to develop a organic system for that
4 particular crop. What I mean by that is, yes, we have all
5 these guidelines and everything, but if you've got a
6 particular problem, for example, one of the things I was
7 able to do was, thanks to OTA, was I took their Organic
8 Advisor Group, and I joined in on a group of advisors that
9 were doing huge crops -- row crops. I'm not doing row
10 crops. I have no clue as to what in the world -- what would
11 I do with a combine? I don't even know what the parts they
12 were talking about, right? And so taking that made me
13 realize, wow, that is absolutely incredible.

14 I mean, Chris is saying he's doing 1,600 acres; my
15 mouth is falling open. I'm like going, I'm lucky if I get
16 10 acres done. One acre done, you know. So here in
17 Alabama, we've got -- that resource is available and I'm
18 hoping we have some, you know, we have some public from
19 Alabama because if we don't push for that infrastructure to
20 start being developed, hand-in-hand as we are growing our
21 systems, we're not going to be able to match.

22 It's the same thing like with the mentor. If that
23 mentee had been caught before he started his little issue,
24 that would have never been an issue, right? Luckily, right
25 now, we've got -- I've got three mentees I'm working with

1 now. One, just got -- she was certified. Another one, I
2 think she said she was getting inspected really soon. In
3 fact, she is getting ready to do, May 2nd, to do some
4 program. She's doing a -- they're doing a walk around to
5 show other people how to get certified organic. So for me,
6 this will be amazing because if I was able to help mentor
7 somebody, she will be able to help mentor somebody else and
8 we continue that section going on. So I'm pretty much -- I
9 don't really have, you know --

10 There was one other thing I noticed that somebody
11 put on the chat. They were asking about if we could talk
12 about regenerative, and I just want to make one little
13 comment before I get off my soap opera box because in
14 Alabama, I hear this all the time. They're like, oh, I'm
15 better than organic. I grow them better than organic. But
16 the truth is, you have to have some start, some basic line.
17 There is nothing else except for the USDA organic
18 certification that actually has a written "this is what you
19 do," right? So, basically, you do that and if you're doing
20 it correctly, part of regenerative, and even just organic,
21 we're not out there to go, oh, we're not spraying anything
22 on our crop. It's really about improving soil health and
23 improving the lives that are involved in it. I mean, I
24 think most of us got in this. Yes, we all like to say, oh,
25 if we're going organic, we're making more money. Yes, that

1 would be nice, too, but the truth is it makes it for a
2 better community and a better overall, a better world,
3 right? So I think that's all I have to say.

4 MS. BECKETT PARR: Great way to end on that soap
5 box, Marguerite, thank you. You've got a lot of hearts
6 there. You're definitely speaking to the right audience.

7 MS. McCLINTOCK: Well, that -- I've got to go back
8 and go collect more drones for collecting semen. You caught
9 me in between when I was trying to do some work with the
10 honeybees. I'm actually down to Florida right now
11 collecting genetics down here. So --

12 MS. BECKETT PARR: Fabulous. That's awesome. Go
13 get some bees.

14 MS. McCLINTOCK: Thank you.

15 MS. BECKETT PARR: If you can stay on just a few
16 more minutes for Q&A --

17 MS. McCLINTOCK: Sure.

18 MS. BECKETT PARR: -- in case there's questions
19 about Alabama, that would be helpful.

20 And whoever's controlling the slides, if you could
21 put it up to slide 17?

22 So in the way that Marguerite was talking about,
23 TOPP is growing the American organic ecosystem. And it's
24 necessary because there's so many states that don't have it,
25 right? You're talking about -- thinking about how many

1 farmers there are overall in Alabama and how few are
2 certified, and one of the ways that we get people in the
3 door is by hosting events. You know, you're not going to go
4 straight to, do you need a mentor? Like, Chris is, you
5 know, flying solo out there in Kansas. And he's like, I'm
6 going to find this, and I found this on the Internet, and
7 then I hounded Brandon, who's the plains guy, and I got
8 connected with Jack. But not everybody is that driven and
9 knows exactly what they want, so you need to have, like, a
10 bigger funnel that you bring people into before they get
11 down into technical assistance and mentorship. So one of
12 the ways that we do that is through events.

13 And in 2024 across the country, we hosted 1,466
14 events. And that's conferences, courses, field days,
15 webinars, workshops. And all of our events are listed on a
16 public calendar on the Organic Transition website. So if
17 you're interested in finding something in your neighborhood,
18 you can look by state, you can look by region, you can look
19 by subject type and what type of event it is. And if you
20 live in a really rural area, you're welcome to join us on an
21 online platform ,like a webinar. Next slide.

22 All right, so I'm going to introduce our last
23 farmer today. This is Michael Levine. So Michael, together
24 with his wife, Mary Kathryn, Michael runs a small-scale
25 mixed vegetable farm in rural Maine. He was recently

1 certified -- whoop whoop -- by the Maine Farmers and
2 Gardeners Association. Congratulations, Michael. And he's
3 a TOPP mentee. And in addition to farming, Michael is also
4 a certified secondary school teacher, and he works as an ed
5 tech at their local high school. Like most farms in
6 America, Michael has got an off-farm job. Somebody's got to
7 do it. And he was just -- we put him at the end because he
8 was running back from his day job.

9 So, Michael, thank you so much for joining us.
10 And we're excited to hear about your small-scale mixed
11 veggie production in rural Maine and how you came into
12 organics and how the TOPP program has benefited you.

13 MR. LEVINE: Thank you. Well, it's a pleasure to
14 be here. I'm going to talk a little bit about some of the,
15 sort of, psychological components.

16 As a late-in-my-life farmer, I did not come from a
17 farming background. I grew up in a suburban home in Newton,
18 Massachusetts, with academics for parents. Always loved
19 gardening. And I moved to Maine in 1991. I lived in
20 Portland for a really long time, worked as a secondary
21 school teacher, as we just discussed. And right around the
22 pandemic, my wife and I decided that we were getting tired
23 of the urban lifestyle and we found this wonderful property
24 out in Hollis. Hollis is about 40 minutes west of Portland,
25 which is, kind of, the biggest city in Maine. Very rural

1 area. We don't even have a police department, so pretty
2 rural. And we found a 50-acre property that was already
3 developed a little bit into a small farm. There's only
4 about an acre that is arable, even though it's 50 acres.
5 That one acre is very well developed. It's all fenced in.
6 It's totally flat. It has irrigation lines down from the
7 hydrant that's near the house. So it was pretty much, like,
8 ready to go. Very overgrown was the only problem. So I
9 decided that I would just, kind of, go at it. I didn't know
10 what I was doing. I had grown vegetables before in my
11 backyard, but so I started out real small, and I just grew a
12 bunch of vegetables and I was pretty successful. The soil
13 was really good and I have a green thumb. So it worked out
14 pretty well.

15 And then the next year, which was 2022, I was
16 like, well, let's sell some CSAs. That might be a thing.
17 We lined up, like, six friends to buy CSAs. We're like, oh,
18 let's see how this goes, and I just grew more vegetables.
19 Like, I hoed more of the property. I literally was hoeing
20 by hand. And gain, managed to grow enough veggies to keep
21 those folks with full boxes and decided to do three days at
22 a local Farmer's Market, which went very well.

23 And so the next year -- going into the next year,
24 I was like, you know what? I'm going to do this. I'm going
25 to, like, learn how to farm. So I watched a ton of YouTube

1 videos and I read articles and I went to a bunch of
2 webinars. And the best decision I ever made was I enrolled
3 in a class that MOFGA offers called Farm Beginnings. And
4 this was a business class to basically help you create a
5 business plan for your farm, which was fantastic because I
6 never thought about, like, a business plan. I was like, oh,
7 I'm going to be a farmer. I'll just grow some veggies. But
8 I didn't realize there was all these spreadsheets involved
9 and projections and blah, blah, blah. So It was really
10 extremely helpful. I learned a tremendous amount. Built a
11 lot of really cool spreadsheets. And the best thing of all
12 was towards the end of it, a MOFGA staffer said, hey, have
13 you heard of this program called TOPP, which I had not heard
14 of. Because at one point in the class, I -- we talked about
15 getting certified because not everybody was certified, even
16 though this was through MOFGA. MOFGA supports all farmers,
17 whether you're certified or not. And I had thought about
18 getting certified, and I picked up the certification manual
19 and it was like 132 pages and I got, like, really
20 overwhelmed. I looked through a bit and it was asking for
21 this plan and that plan and this thing, and I was like, I
22 don't know any of this. I'm barely learning how to farm at
23 this point. So I just put it in a file somewhere, where I
24 think it still is actually, and, you know, thought nothing
25 out of it. But then this TOPP program was mentioned and I

1 was like, sure, that sounds great. I'll be a mentee and why
2 not? You know, I got to learn.

3 So fortunately for me, the best thing that ever
4 happened to me was I got hooked up with Ben Watley, who owns
5 Watley Farms up in Brunswick. It's about an hour away from
6 me. And Ben has just been fantastic. I mean, very patient.
7 I was extremely embarrassed to show -- I saw his setup.
8 He's got five high tunnels and three-acre fields, blah,
9 blah, blah. Then I was looking at my field and I was like,
10 this is, like, pretty small and, kind of, rudimentary. He
11 was great. He came in and instead of, like, you know, being
12 like, hmm, he was like, have you thought about this? What
13 about this? You could do this. And then he, like, sat down
14 with me for an hour and then he typed all these notes up and
15 he sent them to me with links about think about buying this
16 and this, and boom, boom, boom, boom. So that was, like,
17 last summer.

18 And best of all, he said, don't be scared of the
19 paperwork. I will help you. So I literally opened up the
20 application, I called him on the phone and he helped me
21 answer all of the questions on the application for like two
22 hours. It was fantastic. And so I submitted it and we had
23 the site visit. And it -- I also thought organic meant just
24 like not spraying chemicals on your crops, but apparently
25 there's a lot more to it than that. And I learned a lot

1 more about record keeping and about some of the safe
2 practices that help your organic practices and help building
3 your soil up with organic amendments and all this sort of
4 stuff. So I invested in a pretty decent amount of
5 equipment. Nothing -- I'm still -- we're still not
6 mechanized and that's -- that's really just a choice that
7 we've made because the property doesn't really lend itself
8 well. It's not a huge property and we've already got like
9 half of it in production, so it just seemed like what we're
10 doing is fine. I think our most mechanized piece of
11 equipment is a tilter, which is hardly particularly massive,
12 but it's working fine for us. So, we bought a lot of
13 landscape fabric and insect netting and some pipe bar and
14 drip lines and that sort of stuff, which, you know, is going
15 to make a big difference for us this coming year.

16 We also decided to get a WWOOFer, which was a big
17 step for me because I'm like I'm still learning, how can I
18 get an intern and, like, teach them anything because I
19 barely know what I'm doing myself? But Ben made me realize
20 that I actually do know what I'm doing and I do have things
21 to offer a WWOOFer. So we have a WWOOFer coming on May
22 19th, which I'm very excited about because it's going to be
23 nice to have a little bit of help on the farm. It's
24 still -- we're breaking even and making a little bit of
25 money, but it's still not supporting us by any stretch of

1 the imagination. If we do well this year, it could become a
2 part-time job. That's like sort of the scale that we're at.
3 We're selling this year at two Farmers Markets, which our
4 first one's on Saturday. Because we live in Maine and we
5 don't have a high tunnel, we don't actually have any produce
6 to sell yet, but we have lots and lots and lots of seedlings
7 in jiffy pots, so we're going to start with those and keep
8 our fingers crossed that the Type R allows the arugula and
9 lettuce to grow in a couple of weeks once you've started
10 selling that.

11 But the best thing of all is that even though our
12 TOPP mentorship has officially ended, Ben is still my
13 mentor. He's just like keep the questions coming. Happy to
14 come down and look. I went up to his farm, again, after the
15 mentorship was over and took a look. He's actually sold me
16 a bunch of old equipment that he's not using anymore at a
17 huge, discounted rate. And he's just provided me like a
18 real psychological lift.

19 And I spoke about this a little bit at a press
20 conference we did locally with MOFGA, just about how, you
21 know, in order to be a farmer at the scale that I'm
22 operating on, which actually in Maine, a very high
23 percentage of our farms are small like mine; you really have
24 to love what you're doing. Every farmer I know has an off-
25 farm job and it's, you know, just part of the territory that

1 you do. But it's really important to us, especially in
2 these uncertain times, to be, you know, growing food for us
3 and our neighbors. And I'm really proud to be doing it and
4 I'm so grateful to TOPP for providing me with the incentive
5 to actually take that next step and do the certification.
6 So.

7 MS. BECKETT PARR: Thanks so much, Michael. Lots
8 of little hearts. I don't know if you can see the little
9 hearts drifting up. I can feel people appreciating you.

10 And I just want to uplift what you said, which is
11 it takes all types. The United States is a vast country and
12 we have all different types of farms. We have small-scale
13 farms, we have very large-scale farms, we have diversified
14 farms, we have urban farms, we have rural farms, and TOPP
15 has touched the full landscape of agriculture here in the
16 United States. So, it's funny when I talked to you and
17 Chris and Marguerite, y'all were like, well, I'm not -- I'm
18 not really farming. And I'm like, well, it sounds like
19 you're farming. I'm like, it doesn't matter if you're
20 growing on one acre, 10 acres, or 1,600 acres, you've got
21 a -- you're farming. You know, this is -- the majority of
22 what you're doing is feeding other people. You're farming,
23 friends.

24 So I would love to go back to the slide deck, just
25 real quick, and I'm going to bring us home, and then we can

1 break for questions and answers.

2 So as you've heard today from the various farmers,
3 TOPP is growing this organic ecosystem. And helping make
4 that happen, there's 165 plus partners across the United
5 States. These are small-scale organizations that are
6 involved in small parts and very large organizations that
7 are involved in large parts. And last year we helped over
8 3,863 new operations get certified in the United States,
9 representing over 260,000 acres. So, it's a -- it's a very
10 large community effort across the United States. And I want
11 to -- I would love to list all the folks that are involved
12 in it, but we have a short time. So, if you're interested
13 in learning more about the partners in your area, please do
14 go to the website.

15 And I also want to say that given this growth,
16 it's imperative that we not only invest in organic producers
17 and the transition of our people into organic, but that we
18 also continue our investment in organic markets. So, the
19 TOPP program was built in concert with other parts of the
20 Organic Transition Initiative and key amongst those is the
21 Organic Market Development Grants, and those are in
22 community investment in the creation of organic markets. So
23 as we have folks transitioning over, whether it be an acre,
24 or 10 acres, or 1,600 acres, that there is a market for them
25 that's waiting. And so we really look forward to working

1 with USDA to continue to invest in organic market
2 development through the Organic Market Development Grants,
3 and also through market development work on the ground,
4 matching people with buyers like the Organic Trade
5 Association has been doing through their National TOPP work.
6 You can go to the next slide.

7 So support for TOPP is a commitment to American
8 farmers, consumers, and communities. It provides economic
9 growth by investing in American farmers and supports
10 economic growth and rural prosperity. It creates healthy
11 food. We know that organic farmers provide the best
12 medicine by producing foods that are minimally processed,
13 don't contain artificial flavors, preservatives, and are
14 free of synthetic pesticides. And as you all know on the
15 NOSB, consumers trust USDA organic. That USDA organic
16 certification creates transparency and it provides
17 consistency across the United States that consumers are
18 really looking for, regardless of where they shop. So now
19 is the time to continue that investment in American farmers
20 so that they can go organic to meet that increasing consumer
21 demand and, you know, invest in the community. So we're here
22 for questions and answers.

23 If you go to the next slide, there is a QR code
24 that people can click if they're interested in learning
25 more, either from a participant perspective or just a high

1 level perspective. You can download the impact report,
2 access resources on the TOPP website, take a look at our
3 events calendars and contact people that are in your area.

4 And I will pause and welcome questions via the
5 chat or from the NOSB.

6 CHAIR BRUCH: Excellent. Thank you so much.
7 Congratulations to the Southwest Region of TOPP. We were
8 just so inspired by that presentation. I'm going to open it
9 up to questions from the board.

10 Logan, I see your hand. Go ahead. Followed by
11 Allison.

12 BD. MEM. PETREY: Thank you. Great presentations.
13 Thank you, everybody.

14 I did have a question specifically for Mr. Bob.
15 And, okay, so going back to the slide that had all of the
16 different commodities that, I guess, the number of farms for
17 each type, I did see that one of the top ones was peanuts
18 and cotton.

19 So, I'm from Georgia and Florida area, so we
20 have -- those are main commodities here in the conventional
21 market. We have run into, as far as organics, people trying
22 to get into the organic market, the bottleneck is
23 infrastructure. And because those two commodities, unlike
24 corn, which corn does need its own infrastructure, but it
25 does -- it has a much simpler handling process, unlike

1 peanuts and cotton. Could you discuss what Texas has or
2 what those areas have as far as infrastructure or handling
3 facilities for large acre commodities like those?

4 MR. WHITNEY: Yeah, Logan. None of the facilities
5 that we have are strictly organic. They're all going to
6 clean out and start over again with organic. Typically, all
7 the organic cotton and peanuts is just left in bins until
8 everything is processed conventional, and then we move right
9 into the organic commodities. The -- don't really have any
10 trouble with that. We've got all the systems worked out
11 with the handlers. Don't -- I don't have anybody that is
12 strictly organic that would handle either one of those
13 commodities.

14 BD. MEM. PETREY: Thank you. And one follow-up
15 question. In Georgia they have the boll weevil eradication
16 program for the cotton program.

17 MR. WHITNEY: So do we.

18 BD. MEM. PETREY: Pardon?

19 MR. WHITNEY: So do we.

20 BD. MEM. PETREY: Oh, okay. So how do you get
21 around that for the organic producer?

22 MR. WHITNEY: You don't get around that.

23 BD. MEM. PETREY: Okay. So if they were to find a
24 boll weevil, then that would require termination or that
25 require treatment?

1 MR. WHITNEY: There would be some discussion.

2 It's --

3 BD. MEM. PETREY: Okay.

4 MR. WHITNEY: -- going to depend on -- usually
5 what they're going to do is they're going to say, okay, well
6 we found a boll weevil, we're going to have to treat the
7 field. Then you enter in -- because it's organic, you're
8 going to go -- they're going to go back to the board and
9 say, okay, we found this one organic. What do we need to
10 do? They'll do some more checking. We'll do a lot of
11 scouting to make sure of what we're seeing. It could have
12 been an anomaly, could have been out of another field.

13 First of all, if they find one, everybody panics
14 because we just don't find them anymore, so that's the neat
15 part. The other thing you need to realize and then we might
16 have to spray and, yes, it would be taken out for one
17 season. We would lose that and the insurance program within
18 the boll weevil program pays for that difference in organic
19 price.

20 So in the South Plains where almost all of this
21 organic cotton, we just don't have boll weevil. So it has
22 not come up since early '80s. Carl Pepper and I were
23 talking about this the other day, and I can't remember what
24 date he gave whenever he ran into it and got smacked upside
25 the head with it. So yeah, it's a problem.

1 BD. MEM. PETREY: Thank you.

2 MR. WHITNEY: You bet. Good question.

3 CHAIR BRUCH: Thanks, Logan. Allison, go ahead.
4 Then Nate.

5 VICE CHAIR JOHNSON: Thank you.

6 Wow. I want to say thanks for this fantastic
7 overview and organizing such a stellar group of farmers and
8 Jack, Chris, Bob, Marguerite, and Michael. Thank you so
9 much for sharing your stories and being such an important
10 part of TOPP success. It takes all of you.

11 And this TOPP update has become a really
12 outstanding highlight for me in our meetings. I'm so
13 inspired and excited to see the progress. And especially at
14 this milestone and with the report, it's incredible how much
15 infrastructure there is now to support organic transition
16 and how solid it's become in such a short time as a result
17 of TOPP and of the broader USDA Organic Transition
18 Initiative.

19 So I know we're living with a lot of uncertainty
20 right now so I won't ask you what's going to happen, but I
21 will ask in your perfect world, what would the next phase of
22 TOPP look like? What do you want to see as this work
23 continues in some form or another into the future?

24 MS. BECKETT PARR: Yeah, I'll take that first, and
25 any of the other panelists are welcome to pipe up. In my

1 perfect world, it becomes a standard program of the USDA.
2 You know, from the beginning of the founding of the USDA
3 National Organic Program, there wasn't that community
4 development aspect of the National Organic Program. It's
5 really focused on regulatory, and NOP has built out the
6 scaffolding of TOPP to support producers being successful.
7 And that meant that people who had access to the ability to
8 pay for technical assistance could pay for technical
9 assistance, but as a public program, it should be accessible
10 to farmers no matter where they live or how many resources
11 they have. And so, I know that NOP, the statute was changed
12 a little bit to house TOPP underneath it, right? And I
13 would love to see NOP really dig into this community
14 development aspect of what the program could be.

15 And our contracts do go through October of 2027
16 and we -- we hope that the new administration sees fit to
17 invest in TOPP for all the reasons that we laid out over the
18 last hour. And I would love to talk to the National Organic
19 Program about what does it look like in another five years?
20 You know, how do we continue to grow it? Because so much of
21 the work is building it, friends. I mean, like, the car is
22 built, it's on the road, it's down the highway and it's
23 functioning. And the first, you know, six months, eight
24 months, year, was getting it up and off the ground and now
25 we've got this incredible network across the United States

1 that is -- it's cooking with fire. And so that's when you
2 want to invest in things. In my world, that's when you want
3 to invest in things, is when they're really cooking with
4 fire.

5 MR. WHITNEY: I think we've got some good data
6 right now to come back for USDA to come back to the Land
7 Grants and say get off your rear ends, get to work.

8 MS. BECKETT PARR: Yes. You know, for those folks
9 who are familiar, so Land Grant System, right, Extension
10 System across the United States has not traditionally
11 invested in organic technical assistance or research or
12 planning or support. And so TOPP, a lot of states, we've,
13 you know, used that federal resources to match the public
14 investment inside of -- especially out here in the West,
15 inside of extension services to create organic specific
16 positions. So, like, if you look at the University of Utah
17 right now, they have a whole organic page. How do you get
18 certified? What does it take? Who -- you know, how can you
19 search organic products in your area? Who's the technical
20 assistance person that's on the line to help you? And that
21 didn't exist before TOPP. And so, yeah, it's definitely,
22 like -- it's a carrot approach of getting university
23 extension to see the value of TOPP, right, and continue that
24 investment, matching it with local resources.

25 Thanks for that, Bob.

1 MR. GEIGER: So, Jessy started to speak to that
2 point. So, I think of my introduction, we've been certified
3 since 1989. And one of the ironies is that I've interacted
4 with extension; the -- that's one of my goals in life, to
5 present at every Land Grant University. But anyway, it's
6 been hit and miss. And a program like this, every state
7 approached it differently. Some started. Stopped. You
8 know, it's been so hit and miss. And the irony is, is that
9 in a short time, TOPP has built a program that is, kind of,
10 applicable to extension throughout the U.S., and the Land
11 Grant University could be the vehicle to carry it forward.

12 It's, like -- it's just a -- it's a wonderful
13 accomplishment how much has been built so fast and how the
14 traditional system, the Land Grant System, which should have
15 built something like this, or could have built something
16 like this but was too dispersed and regionalized and
17 balkanized, if you will, this could be -- they would be the
18 natural carrier for this. It's, just -- it's right there in
19 front of your face.

20 CHAIR BRUCH: Excellent. Allison, thanks for that
21 question.

22 Nate, go ahead. I see your hand.

23 SECRETARY LEWIS: Yeah, thanks again, to echoes on
24 the great presentation.

25 I had a question, kind of, related to the tension

1 between folks who are farming organically but are choosing
2 not to be certified, and those that do see the value in the
3 label and the certification process. We've been told that
4 there are many paths to organic and certification is one of
5 them, but also TOPP seems to measure its success in acres
6 and farmers and certificates. And so I'm just, sort of,
7 curious how you, kind of, as you administer TOPP over such a
8 broad geography and a range of growers and different market
9 priorities, sort of, how you, sort of, handle that tension
10 between the certification versus the, you know, choice to
11 not be certified but still gain the value out of the
12 information and mentorship from organic growers?

13 MS. BECKETT PARR: That's a great question, Nate.
14 Yeah, it's been really eye-opening for me. So, again, I --
15 I'm the PI for the West-Southwest, so that's Texas to
16 Hawaii, and how many folks are farming using certified
17 organic methods but not getting certified has been a huge
18 eye-opener across our whole region. A lot of them -- a lot
19 of them are very small-scale farmers that are using those
20 methods and they're selling to local markets that have a
21 value and a price point just put on local food, period,
22 because they're the only small farmer in their rural town
23 in -- you know, outside of Salt Lake City.

24 But this program was built by the National Organic
25 Program, and so where the rubber hits the road is organic

1 certification. That's the line. That's the bright line in
2 the sand. And so, yeah, of course, that's how we are
3 measuring success. And that is what we're really trying to
4 get people through, too, because that's when they're
5 counted. They're counted in the Organic Integrity Learning
6 Database. You know, that -- that's when we know they're
7 doing what they say they're doing. That's -- you know, that
8 was the point of organic certification, is to make sure that
9 people are doing what they say they're going to do.

10 I am confident there's a lot more acres that are
11 impacted by this program with people's practices, probably
12 double or triple, but we're taking the highest bar, which is
13 people who are getting certified. Acres that are getting
14 certified. Crops that are getting certified. And that's
15 the -- that's the highest bar, and that's what you want to
16 shoot for, right? We want to get people certified. We want
17 to grow certified organic agriculture in the United States.
18 Of course, I'm coming from a certifier angle. This was
19 built in partnership with certifiers. I work for CCOF. You
20 know, we -- that -- that's what we stand on, right?
21 That's -- that's where the rubber meets the road.

22 But that's a great question, and I'm sure the
23 impact is broader looking at people and farms and
24 communities and acres if you're looking at people who are
25 changing their practices towards organic out of this, as

1 well.

2 MR. LEVINE: Just want to add --

3 MS. BECKETT PARR: I'm looking.

4 MR. LEVINE: Sorry.

5 MS. BECKETT PARR: Yeah, go ahead, Michael.

6 MR. LEVINE: From a perspective of Maine, it
7 really makes a huge difference at these farmer's markets if
8 you are certified organic. And they're pretty particular,
9 market managers, about not letting you say that you're
10 organic. Even if you say organic practices, that's not
11 going to let you sell organic produce. It makes a huge
12 difference to the consumers. It's not even honestly a
13 difference in price point for the most part because we can't
14 really charge a lot more, but it gets customers much more
15 interested because they're much more interested in the
16 health benefits of organic produce.

17 MS. BECKETT PARR: Thanks for that, Michael. And
18 I want to shout out to Maine folks who are running those
19 Farmer's Markets, because it's not the case in all Farmer's
20 Markets in the country. You could just talk to our partners
21 in Hawaii about that.

22 Marguerite, I saw you come back. Do you want to
23 chime in on this?

24 MS. McCLINTOCK: I wanted to comment on that one
25 because it's interesting. You know, here in Alabama, okay,

1 I don't want to say we're a little bit behind all the time,
2 but the cool thing is about Huntsville, we've got a lot of
3 people moving in from California. I don't know why they
4 want to -- we're just better. No. We -- but the thing is,
5 is it's a matter of educated consumers, right? So the more
6 you have consumers who are educated --

7 People used to always ask me, well, why do you
8 want to be certified? You know, it's like Michael said,
9 price point really doesn't matter; it's because, it's like,
10 well, I can do this. You know, if you're going to do
11 something, get certified.

12 One of the biggest problems we have with sheep
13 when I register sheep, people are like, well, I have these
14 sheep. I don't need to get them registered. I'm like,
15 yeah, true, you don't, but they don't get counted. So, you
16 know, if you want to be counted and you want to say you're
17 part of it and you want to keep that data and you want to be
18 part of that record keeping, then just, you know -- you say
19 you can do it, do it. You know, so and I think that's only
20 going to come with education. So, if you have programs like
21 what you guys have, and -- and have the ability to continue
22 to support, especially the mentorship because you -- there's
23 a lot of people I see now -- in fact, they were even my
24 students at one time, and I hear them talking about organic
25 certification, but unless you're a farmer and you've

1 actually gone through that process of getting certified, you
2 really don't know what -- it looks different on paper
3 sometimes. You know?

4 MS. BECKETT PARR: Absolutely. Yeah, a lot of big
5 talk before you go through the process.

6 CHAIR BRUCH: Any more questions from the board?
7 I'm not -- oh, Dilip, yeah, go ahead.

8 BD. MEM. NANDWANI: Thanks, Amy.

9 I thought -- I think we have some time. It's not
10 really a question. First, I would like to applaud, you
11 know, all the presenters. Beautiful presentations. A lot
12 of information. And being part of Midwest TOPP, you know,
13 and also part of Extension -- Cooperative Extension in the
14 Land Grant University in Tennessee, so I was just curious to
15 know a couple of points, whatever you can share.

16 The first one is about, you know, you have a lot
17 of partners. I know I see 165 organizations. So I'm
18 curious that how many your university partners or
19 cooperative extension, you know, folks are involved with
20 your TOPP Program? And we have here, you know, very
21 knowledgeable mentor and mentee here. They have their -- a
22 lot of good experience, so also I'm just curious what
23 challenges or, you know, your experience or you can share
24 with other TOPP regions here in, you know, in U.S.? We have
25 six regions here, so anything you want to give any advice?

1 Because we have -- I work with a lot of small scale farmers.
2 You know, when we say small scale, there is no -- I think
3 there is no definition. It's maybe less than 10 acres. So
4 we have lots of small farmers, you know, diversified farms
5 as you mentioned, urban farms, maybe an acre or two acres.
6 So a lot of mentee list, less mentor list. So just curious
7 how you couple them, you know, like, connect because they
8 are very distinct, right? Somebody is in Hawaii in your
9 region and somebody in California or maybe Texas, so how you
10 connect them? Anything you want to share in it quick would
11 be appreciated. Thank you.

12 MS. BECKETT PARR: Sure thing. Yeah. So this
13 presentation was really sculpted to talk about the National
14 TOPP. But if we're talking about the region that I run in
15 the West-Southwest, we have a different partner in each
16 state that manages the Mentorship Program that understands
17 that state. Every state is very different. Even from the
18 top to bottom of Texas, it's different. But by partnering
19 with folks that are in those states, they have a much better
20 sense of geography and growing region and what people need
21 to be able to be successful.

22 Out here in California, CCOF runs the Mentorship
23 Program. We have over 2600 certified operations through
24 CCOF in California alone, and so we had a huge roster of
25 people that might be interested in being mentors and we can

1 see what they grow and where they grow it. And like I
2 mentioned earlier, there's a giant Excel spreadsheet of who
3 might be good for who, right? And we're talking like, we
4 need a sprouts grower. We need somebody who does medicinal
5 Chinese herbs that's in a desert climate. You know, like
6 very specific things.

7 But like, you know, Bob is running the mentorship
8 program for Texas, right? And it's because Bob has been in
9 Texas Extension for 40 years and he knows everybody. I
10 mean, I've dropped into multiple towns in Texas and they're
11 like, oh, Bob. Bob. I mean, of course they know him,
12 right? And so you really want to work with local groups,
13 like folks that know what's happening on the ground.

14 And I want to uplift the partner that's overseeing
15 your region, which is Florida Organic Growers, and they're
16 based in Florida and they've been, you know, scaffolding the
17 mentorship program for the whole Southeast Region. And it's
18 been really -- I want to highlight the challenge that it's
19 been for them because there's less certified organic growers
20 in the Southeast than there are in the other regions. Out
21 here in California, like I said, we have 2,600 farmers that
22 are already certified that we could choose from. That's a
23 lot of people to be able to choose from. But if you only
24 have 15 people in the state that are certified, and you
25 winnow it down to the one person who says yes, that's a much

1 bigger challenge.

2 And then the different regions have been
3 coordinating across regional boundaries and state
4 boundaries, right? So an example is we've got folks in
5 Arizona who are working with folks in Colorado, which is
6 across a state and a regional boundary. But the different
7 regional leads are like, hey, I need a rancher with this
8 climate that does this type of ranching and has this many
9 cattle, you know, who's got that? And we're like, oh, I got
10 you, I got you. And even if it's over 1,000 miles, you
11 know, people are communicating by email or text message or
12 Zoom or video conference or FaceTime. So we really are
13 trying to, like, match people with the folks that are the
14 most useful for what they have going on, right? You don't
15 want to match people who are farming at really different
16 sizes and scales and different types of crops.

17 Because, like -- you know, like, Michael uplifted
18 in Maine, he was matched with another small-scale vegetable
19 farmer who was, you know, a few steps ahead of him but,
20 like, not incomparable. It wouldn't have made sense to
21 match him with Logan growing for Grimmway on hundreds and
22 hundreds of acres in Georgia, right? So, like, it's -- you
23 got to have, like, comparable life experience.

24 BD. MEM. NANDWANI: Thank you.

25 CHAIR BRUCH: Excellent. Thank you for the

1 question, Dilip.

2 I have one last question and then I think we're
3 going to conclude this session. There was a comment on, you
4 know, we do have a pipeline of growers here, and TOPP has
5 really facilitated that, which is incredible. And there was
6 an initial comment about, you know, overall ag trade
7 deficit. And we have a big opportunity with organic. I
8 think Bob even alluded to maybe markets; we need to put some
9 focus on some markets.

10 You know, I just -- kind of, general question,
11 what more can we do on a marketing end so there are outlets
12 for producers? And if any farmer wants to specifically
13 comment on which markets are really in need of development,
14 that would be helpful. Thank you.

15 MS. BECKETT PARR: I would love to tag Chris for
16 this because he did work in international food trade for a
17 long time and has, kind of, like, that marketing background.

18 Chris, if you feel comfortable.

19 MR. BARNETT: So, just to clarify the question, it
20 was which -- where a producer can take, like, grains? Are
21 we talking about grains or beef or?

22 CHAIR BRUCH: Yeah. I mean, if you're feeling any
23 market constraints, I'm a producer, as well, and we heard
24 from producers on public comments that, you know, market
25 opportunities for organic growers are something we need to

1 divert attention to. So, I just, you know, just was curious
2 on your perspective of that, if that resonates with you and
3 what opportunities?

4 MR. BARNETT: I would speak on the beef market for
5 a particular side. You know, it's very hard for -- to
6 maintain a certification there, I would say, or to gain a
7 certification there. And then, you know, for as a producer
8 to enter into the organic market on the beef side. But I
9 would say the main challenge would be the imported beef. If
10 you go to any major supermarket and you look at their
11 organic beef, it's going to be Brazilian beef. It's not --
12 it's not coming from us. So, and we could never hit the
13 price point that they're hitting. So, I would say that
14 would be the biggest challenge for us, you know, to enter a
15 market where the imports are actually beating us out of the
16 water on price.

17 You know, that would be my two cents.

18 MS. BECKETT PARR: Thanks for that.

19 Bob, do you want to chime in because you're
20 working in markets that also have international competition?

21 MR. WHITNEY: Oh, you're going to get me fired.

22 MS. BECKETT PARR: Uh-oh.

23 MR. WHITNEY: It's a big issue. Big, big issue.
24 I had 82 organic rice farmers. I'm down to 22. And it's
25 all -- all the buyers tell me it is strictly because of

1 imports. The -- we're actually competitive with price, but
2 because they've already established their market, they just
3 keep buying from the same ones.

4 Beef is a big issue. And we've got some guys that
5 want to expand their operations and Brazil is killing us.

6 We -- there was four times as many acres of
7 peanuts grown in Mexico than they've got acres certified.
8 Tell me how that's possible because that's how many peanuts
9 came in. I don't know what's going on.

10 There's just an ease of being able to bring these
11 products in. Since we've gone through SOE, I think that's
12 great, you know, but now it seems to open up some
13 floodgates. So just some investigation into that kind of
14 thing, how this is working? Give us some feedback. I can't
15 get any feedback. Help us to know how to plan our programs
16 with our producers. And to actually plan for the producers
17 where we're going to go because if I've got a transition guy
18 comes in and says I want to grow organic rice, I'm really
19 excited about that, what am I supposed to tell him? You
20 don't have a market. And I did. I literally had three guys
21 that are waiting for the market to get better in organic
22 rice to come in.

23 So, anyway, I'm sorry, Amy. I can keep going.

24 MR. GEIGER: So Amy, I -- to think that we can
25 take the conventional production model and duplicate it in

1 organic, that model will fail.

2 One of the things that I have thought about and
3 worked with long term are, you know, thinking about
4 developing regional markets. And this story ties directly
5 back in to Chris.

6 So Chris has a wheat crop that he is attempting to
7 certify this year. The irony is Kansas is the Wheatley
8 State. The irony is Kansas imports wheat from third world
9 countries. The irony is, is that, you know, I don't want to
10 say we're a net importer of wheat, but we have imported
11 wheat to satisfy demand for Kansas millers that export -- or
12 that distribute wheat throughout the entire United States.
13 And so we have to figure out how to exploit or how to take
14 advantage of regional and local. We have to -- we have to
15 re-engineer the system, if you will. And I'm so proud of K-
16 State. K-State is rebreeding new varieties that are
17 targeted to organic wheat production. And so there are
18 things moving, but these are relationships and they take
19 time. They're not instant gratification. These are
20 projects that I've been working on for years.

21 And the -- to make a long story short, compete
22 with the things that you can compete with, in the markets
23 that you can compete with. And the more local and the more
24 regional they are, the better of an opportunity you're going
25 to have.

1 CHAIR BRUCH: Thank you for the answer to that
2 question. And I know there's more to discuss for sure.

3 This is a real conversation. We highlighted
4 challenges, triumphs, community fellowship, passion and, you
5 know, I think all of us want to stay really closely to your
6 stories and stay -- and we invite you to participate in our
7 public comment process so we can keep up to date with what's
8 happening. And for those in Kansas, I'm just your neighbor
9 to the north in Nebraska. So hopefully we'll be talking
10 even more.

11 But with that, thanks again. This was an
12 incredible session. And we're going to go to a break and
13 return right at the hour, so 4 o'clock. Quick break. Nine
14 minute break here. Thank you again so much.

15 (Whereupon, a brief recess was taken.)

16 CHAIR BRUCH: Good afternoon and welcome back to
17 the final segment of today's session.

18 Momentarily, we will be transitioning to the
19 Policy Development Subcommittee. But first a couple slides
20 just to highlight that we do again have an NOSB Policies &
21 Procedures Manual, so we will be following that as closely
22 as possible. And Andrea and Michelle have a few slides up
23 here to talk about some of the details. And we highlighted
24 this on the front end.

25 The board was asked -- all board members were

1 asked if they had any conflicts of interest that they needed
2 to recuse themselves, and the survey results showed zero
3 recusals due to conflicts of interest.

4 Our next slide is going to be highlighting just
5 the voting procedure, as well, and I'm not going to read all
6 the details. If you want to go to the policies and
7 procedures manual that we have, it is available on the
8 website. But I will just be planning on calling on board
9 members when we are voting. We have seven voting elements
10 during this meeting. I will be calling on you in
11 alphabetical order. And then I will be rotating that
12 alphabetical order list.

13 So without further ado, I'm going to hand over the
14 mic to Nate Lewis, our Subcommittee Chair for PDS. And
15 Nate, I'm going to also have you facilitate the discussion,
16 as well, for the discussion document. Thank you so much.

17 SECRETARY LEWIS: Great. No problem. I'm happy
18 to kick off the meeting, and look forward to conversation
19 about the topics we're tackling in Policy Development
20 Subcommittee. So let's jump into next slide, please.

21 So first, I just wanted to give stakeholders an
22 update that we are continuously fine-tuning our policies and
23 procedures manual. That is the main charge of the Policy
24 Development Subcommittee. And ongoing work that we hope to
25 put into a proposal for the fall are some updates to the PPM

1 that address our new process or process that we're trying to
2 tackle related to annotation changes at sunset review. So
3 last year was the first year that we tried to bring
4 annotation changes during sunset review, and I think we made
5 some good progress. We've learned some things. And it's
6 important to write down those learnings for future boards so
7 that that process can become part of our ongoing work.

8 We also want to add some texture and definition to
9 our technical reviews. When does a technical review need to
10 be ordered from a third party? When can it be conducted
11 internally based on the expertise of the board? And just
12 some clarity around that -- the words we use and the
13 terminology related to technical reviews and the
14 underpinning of our National List recommendations from those
15 documents would be really valuable in the policies and
16 procedures manual.

17 And then lastly, we are looking at some governance
18 for the board's interaction with technology. We have two
19 things on our list right now. One is that a lot of our
20 board documents have been migrated into a SharePoint site
21 that's managed by NOP, and just some general guidelines for
22 the board and future boards should that structure remain
23 could be helpful. And then AI, artificial intelligence is
24 becoming ubiquitous in our work lives and we're looking at
25 how the board should or should not interact with that

1 technology moving forward.

2 So these are some highlights and just a
3 foreshadowing of work to be done and hopefully a proposal
4 for the fall meeting.

5 So before I jump into what I think will be the
6 core of the discussion related to sunset review, efficiency
7 and voting, are there any questions from the board related
8 to the PPM updates?

9 Brian, go ahead.

10 BD. MEM. CALDWELL: Yeah, thanks, Nate. So glad
11 that we're going to be working more on annotation changes
12 because it's definitely come up a couple times in the
13 livestock, you know, reviews.

14 But I wanted to ask about the TRs and last year,
15 of course, we had quite a back and forth about Meloxicam
16 having an internal review and some of the commenters said
17 that they were not able to look at that, and I thought that
18 we had somehow made a point after that that the review that
19 was done was going to be, you know, on a website available
20 to the general public. Do you know about that?

21 SECRETARY LEWIS: Yeah. No, I think the -- and
22 the Meloxicam discussion is exactly what inspired the need
23 to add some definition to the technical reviews. And I
24 don't want to speak out of turn, but our intention was to
25 make that internal review public. I haven't personally

1 checked to see if it is available under the Meloxicam
2 section in the Petitioned Substance Database, but if it's
3 not, we'll make sure it's there. And I think it just, sort
4 of -- again, going into the meeting when a vote is going to
5 happen, for the public to have the technical information
6 available to them that is available to us just levels the
7 playing field and adds that level of transparency that
8 everyone's expecting in the National List review process.

9 BD. MEM. CALDWELL: Yeah, I totally agree. So
10 thanks for that. And yeah, I think that people, when they
11 see that review, they will be reassured. But yeah, we've
12 got to get it out there. So thanks.

13 SECRETARY LEWIS: Appreciate it, Brian.

14 All right. Not seeing other questions, let's go
15 to the next slide, and we'll jump into the Discussion
16 Document that we have available for this meeting related to
17 Sunset Review Efficiency. And I'll try to go through these
18 slides quickly; quickly enough to get the message across,
19 but not too quickly that I blindside everybody.

20 So really the intention with our discussion
21 document was to create a process where non-controversial
22 materials could be voted upon in a single motion, rather
23 than voted on individually, and I'll have to say the impetus
24 for this, and the drive to trial something really came from
25 board members who wanted to spend time together hashing out

1 and diving into technical details and complicated
2 conversations, rather than all voting no to not remove
3 something from the list that we all know is going to be
4 on -- remain on the list. So we really are just, sort of,
5 trying to respond to the interests and desires of the board
6 members, both past and present, and really just want to
7 trial something.

8 So in this proposed course of action, materials
9 that are eligible for the group voting process have to meet
10 a couple of characteristics. They -- first, they have to
11 have been unanimously relisted at the last sunset review,
12 and it must not have received comments where new information
13 is presented. This could be a comment from the public or it
14 could be a technical review that we ordered material that's
15 already on the National List.

16 Now the first bullet, those are facts. We can
17 look back on the transcript and determine what was voted
18 unanimously and what was not. The other one is a judgment
19 call that we tend to lean on the board members to make that
20 judgment call, whether there's new information that changes
21 whether someone -- whether a material should be added to
22 these group votes or not. Between the spring and fall
23 meeting, the subcommittee would propose which substance
24 should be included in a group vote for the fall meeting.
25 And then before we actually take the vote, any board member

1 can request a substance be removed from the group vote and
2 discussed individually for any reason. Next slide.

3 So here is a list of the sunsets we are working on
4 this year, which received unanimous votes last time around.
5 So this would have been fall of 2020. This is the list of
6 substances. So if the leads all recommend that these be in
7 the group votes, and -- and there are no objections to that,
8 we conceivably could be looking at taking all of these
9 substances, and I didn't list all the colors, there's a
10 number of colors in that group, we could be taking three
11 votes, one for each of these subcommittees on all these
12 substances, as opposed to the, you know, 20-some-odd, you
13 know, dozens of votes that we would be taking otherwise.
14 So, just as an example of what we are looking at right now,
15 and what sort of time savings might be possible. Next
16 slide, please.

17 Add I wanted to run through some very specific
18 examples. These are the substances for which I am the lead
19 this semester.

20 And so, for in Crops, we have -- I am leading
21 aquatic plant extracts and sodium silicate. Aquatic plant
22 extracts was not relisted unanimously its last time around.
23 And to -- on top of that, we did order a Limited Scope
24 Technical Review related to the use of the different
25 extractants for these types of products. So by both counts,

1 not eligible for a fall meeting group vote.

2 Sodium silicate, on the other hand, is used as a
3 flotation agent for pears in pear packing. Last time
4 around, it was previously relisted. Comments so far have
5 suggested it remains necessary, and especially for smaller
6 pear packers, there is a need for a flotation agent and it
7 is a go-to material. It is an eligible material for a fall
8 group vote.

9 In Livestock, we have magnesium hydroxide. That
10 is a substance that is used for inflammation. Or yeah. No,
11 it was -- it's used as an antacid and as a constipation
12 relief in cattle. Previously relisted unanimously, have not
13 seen any new information come up, it could be eligible for a
14 fall meeting vote.

15 Flunixin is a material used to reduce
16 inflammation, particularly around mastitis events in cattle.
17 It was previously relisted unanimously and no new
18 information. But I will -- I do want to acknowledge that we
19 are, as a community, talking about withdrawal times and
20 Flunixin is one of those substances that has a withdrawal
21 time associated with it. It might be worth pulling it out
22 of the group vote just so we can have a more comprehensive
23 discussion at the fall meeting related to those withdrawal
24 times.

25 So I just wanted to, like, put some real-world

1 context around these -- this approach. Next slide, please.

2 Just as a review of what this would look like,
3 nuts and bolts. The spring meeting, which we are in right
4 now, and I look forward to our sunset presentations tomorrow
5 and Thursday, same -- same as you -- same program. Sorry,
6 let's go back one. Yeah, there we go. Sunset
7 presentations, we'll identify as part of it whether or not
8 it's eligible for inclusion in a group vote in the fall and
9 would definitely appreciate recommendations from the leads.

10 Between spring and fall meetings, we have the
11 subcommittee meetings. That's when we do the -- we complete
12 our sunset review write-ups in preparation for the fall
13 meeting and take our subcommittee votes. And it would be in
14 subcommittee that we would establish a proposed set of
15 sunset substances to be included in a group vote for the
16 fall meeting.

17 Now, at the fall meeting, board members would
18 review public comments. We would review what's in the --
19 what was proposed by the subcommittees to be in those group
20 votes. And any board member could remove any of those
21 substances, if so compelled, and felt like there was need to
22 discuss things. We would vote on the substances remaining
23 in the group, and anything that wasn't in a group would be
24 voted on individually as we typically do. Next slide.

25 Just a brief summary of public comments on the

1 approach. We have some stakeholders, including previous
2 board members, supportive of the approach to streamline
3 voting procedures.

4 Many stakeholders agreed with the overarching
5 goals of making the workload more sustainable, and some
6 questioned whether saving time during the votes would yield
7 much effect. That is yet to be determined and why I'm
8 advocating that we try and consider this as an approach.

9 Stakeholders noted that using a strict consent
10 agenda approach would imply that no discussion can occur
11 when considering the group substances for a single vote.
12 And I think that's important jargon to dissect as a group,
13 as we talk about this, that a consent agenda does stifle
14 discussion related to the things on the consent agenda. We
15 can choose to talk about this as a group vote, as opposed to
16 a very strict consent agenda. We certainly do not want to
17 stifle debate and conversation and discussion around the
18 merits of each substance on the National List. We're really
19 just trying to be more efficient with our voting system so
20 that we can free up some time to have those discussions.

21 And then some stakeholders expressed concern with
22 any reduction of opportunity for board discussion on a
23 substance in the public space. I totally believe that we
24 must remain transparent and we certainly don't want to
25 reduce that opportunity for discussion.

1 So I think we'll need to balance all of these
2 threads moving forward and I think with that I don't have
3 any more slides, so I'll open it up to discussion or
4 clarification or questions for PDS on the -- on this
5 approach to voting in the fall.

6 Brian, go ahead. And Allison, next.

7 BD. MEM. CALDWELL: Good. I'm glad -- yeah, I
8 knew there were going to be more comments but I didn't want
9 us to be, you know, silenced out there. But, yeah, I think,
10 Nate, you and the PDS Subcommittee have done a really
11 fantastic job of trying to ensure that if a discussion needs
12 to happen for a substance, that there are a lot of
13 opportunities for it to happen. And the key thing -- the
14 key provision, I think, that you put in there is that any
15 board member can take something off of the group vote in the
16 fall meeting, and then it will have its, you know, its full
17 discussion. And I think that that really prevents a
18 railroading, kind of, approach that you could conceive of
19 happening with something like this where, you know, if the
20 majority of a board really wanted something to happen,
21 didn't want to have any more discussion about it and boom,
22 they wanted to put it on the group vote. Well, a single
23 member of NOSB can say no, let's take that off of the group
24 vote and talk about it. And so I think that's a great
25 safety valve and really accomplishes the safety part of it

1 that you really want to do, and the full discussion part
2 that needs to happen, if necessary, and yet it still allows
3 for us to have an expedited, quicker procedure for the vote.
4 So I really appreciate the work. I think it's a lot of good
5 thinking.

6 SECRETARY LEWIS: Okay. Thanks, Brian.

7 I got Allison, and then I see Kyla, and Franklin
8 for the queue.

9 VICE CHAIR JOHNSON: Yeah. Thanks so much for
10 spearheading this, Nate, and for laying out how it will work
11 if we move ahead with it.

12 I think this is going to be really helpful. The
13 TOPP presentation we just heard is the type of information
14 that I love seeing come into these meetings. It's a way to
15 be hearing from all parts of the organic industry. We've
16 had really successful panels in the past when we're dealing
17 with a particularly sticky issue. So finding ways to carve
18 out more time in these meetings for that type of content,
19 and for deeper discussions on some of the trickier issues
20 before us I think is a really worthwhile undertaking. And
21 so this is one way where we can find a little bit more time
22 in the agenda and balance that.

23 And echo what Brian said, that I feel pretty
24 confident that there are a lot of checks and steps in the
25 process that we've laid out that give opportunities to air

1 issues, to pull something out, to really make sure we have a
2 discussion anywhere it's needed.

3 A lot of the comments that I heard where there was
4 some concern, it was, is it going to be documented in the
5 record for the future board? All the written materials will
6 still happen. We'll still have two opportunities for the
7 public to weigh in, in written and oral comments. So the
8 spring is, sort of, a heads up, this might end up in the
9 group vote. And if someone did have new information that
10 they need to make sure to bring forward between the spring
11 and the fall, there's a chance in the fall to say, oh, we
12 did receive new information in public comments on this
13 material that we should make sure we discuss. That's still
14 there.

15 So I'm really thinking something like arsenic. I
16 don't think we're ever going to vote arsenic off the list.
17 We don't want that in organic agriculture. Do we need to
18 spend 15 minutes talking about it? Probably not. So those,
19 like, really discreet materials that have been discussed a
20 bunch of times don't seem to have much change in the market,
21 those are the types of materials that I see us targeting
22 with this.

23 I did have two thoughts to, kind of, throw in the
24 mix as we trial this this year. One is, I think it's likely
25 we will never put 606 materials into the group vote because

1 we'll always be looking for new commercial availability
2 information. So every five years, we want to be looking to
3 see, has the market changed? Is something more available?
4 So it seems very unlikely to me that we would put 606
5 materials into a group vote.

6 And then I wonder if we want to consider having
7 the group vote at the very end, so we have all the
8 individual discussions. One commenter mentioned that, you
9 know, sometimes kind of in the process of talking about
10 materials, things come up and you notice something in the
11 public comments that you missed initially or something like
12 that, so building in as much time as possible for that to
13 happen in the process of the meeting and then taking that
14 group vote at the very end might be one last way that we
15 can, kind of, like, carve out that space for a spur of the
16 moment reassessment and pulling something off the list.

17 But yeah, I'm excited to see how it works this
18 year and look forward to this ride with you all.

19 SECRETARY LEWIS: Thanks, Allison. Really great
20 suggestions. Appreciate it.

21 Kyla, Franklin, and then Carolyn.

22 BD. MEM. SMITH: Yeah. I am look -- yeah, I'm
23 excited about this piece of work and thanks for PDS for
24 tackling it and, like taking, sort of, a frustration that
25 was, sort of, talked about in the hallways and, like,

1 putting some real life to it. And I can understand the
2 stakeholders hesitancy and I think that y'all so far have
3 done a really great job of building in those safeguards, and
4 I think the additional comments made by Allison are great.
5 Some other things that may want to be considered next
6 semester for inclusion in a proposal.

7 Also ,I think a commenter talked about, like, some
8 type of, like, resolution, like -- or something, like, as a
9 backstop and so we want to, like, relook at that.

10 And then also if it was a materials first sunset
11 review, like, perhaps, even though it was, like, unanimously
12 listed to list it, like, not having gone through the --
13 like, one round of a sunset, maybe that also would cause a
14 material to be ineligible.

15 And, you know, there are some curveballs that get
16 thrown at us. Like, who knew baking soda, sodium
17 bicarbonate would -- is-- I'm going to -- I'm the lead on
18 that, and will propose that it is not eligible for a group
19 vote because we got new information on a TR, and so, like,
20 that is one that is -- this is, like, the process at work,
21 right, where we are -- we're pulling things off where we do
22 need further discussion.

23 And I just also echo what Allison said. Like, we
24 have a backlog, we have a list of panels that we are trying
25 to incorporate into board meetings and we're, like, okay,

1 well which one's going to be most relevant at this meeting
2 at this time? And, like, we can't get to them all and we
3 just, like, keep, like, adding these speakers and these
4 expert panels that we want to hear more from, to continue to
5 grow and elevate the organic marketplace and we just can't
6 do it all. So I'm all for efficiency in the process and
7 look forward to trialing and incorporating some of these
8 additional ideas on how to protect our process.

9 SECRETARY LEWIS: Yeah, thanks, Kyla.

10 And just to put a finer point on one of the
11 suggestions you made related to materials added to the list
12 who are up for their first sunset review, I deliberately did
13 not include fatty alcohols, which we will be voting on this
14 fall in its sunset review because it was added into this
15 cycle, so it has never had a sunset review up until this
16 point and, sort of, wanting to take the conservative route,
17 did not add that to the list of eligible materials for the
18 fall group vote because it will be its first sunset review
19 and it's worthwhile, kind of, pulling that one out and
20 talking about how it's succeeded as a material.

21 So, great points. Appreciate it.

22 Franklin, then Carolyn, then Amy.

23 BD. MEM. QUARCOO: Yeah. In light of their great
24 work, in light of some of the comments from our
25 stakeholders, Allison addressed one of them where we still

1 have the sunset document as part of the record. Listening
2 to some of the comments is it possible to have a summary,
3 synopsis, a couple of lines of the -- on each of the items
4 so the feeling is not like it's been bunched together in a
5 document and folks listening don't know what's there? With
6 all that we've done, the spring meeting, it's leading up to
7 it it's all public, but in addition to that is it possible
8 that the number of materials that are there, a couple of
9 lines, like, let's say strychnine, you know, nothing has
10 changed about it, a few things about; is it poisonous or
11 not? Then we just move on. So it's not like we just list
12 them and then vote on them, but there are a couple of lines
13 or a summary. And when folks want to refer to what is
14 there, they go to -- if the last sunset review from the time
15 where it underwent the full review is what is available or
16 updated but, basically, not new information, per se, that
17 can be included in the booklet so people will always have a
18 record of that material, even if we didn't undergo a full
19 discussion.

20 In addition to when we are about to vote a
21 summary, I don't know whether that summary will defeat the
22 whole purpose and get us to lose the time, but it's just a
23 suggestion

24 SECRETARY LEWIS: Yeah. No, I appreciate that,
25 Franklin. And I want to be extremely clear that this trial

1 that we're working on is only affecting the voting process.
2 So each material will get the -- each -- the meeting packet
3 for the fall will have each substance's full write-up, and
4 so the meeting packet will be complete just like it has been
5 for, you know, the board's work up until this point, and
6 we're simply trying to consolidate the step of voting it off
7 the list. You know, perhaps a summary could be helpful, so
8 we're totally eager to push that idea out, but I want to
9 make sure that folks on the -- in the gallery are aware that
10 we're not proposing any changes to the way the written
11 materials are proposed -- are brought forward on the
12 substances. So but thank you for the suggestion.

13 Go ahead, Carolyn.

14 BD. MEM. DIMITRI: Great. So, I guess, I also
15 want to remind us that last fall we tried that new system to
16 try to, like, go through things a little faster, and Amy
17 gave us a training with the one-point lesson, and I think
18 what happens is we try to be so diligent that we talk too
19 much about things that, you know, we don't really need to
20 talk quite so much about. So part of this is, like, we
21 don't have enough, I'll call it "self-discipline," to keep
22 our conversations short -- I mean our discussions short so
23 that we don't have to, like, get into the situation.

24 So I -- so I do have, like, three thoughts,
25 though. So one is, I think that maybe instead of being

1 unanimously voted on in the last meeting, if it was the last
2 two meetings, then it would cover a 10-year period, and it
3 would get to the kinds of materials Allison was talking
4 about. Like, that they're very stable and there's no new
5 information and, you know, we've had 10 years at least of
6 people agreeing that these were important. That's one.

7 Two is, like, would it be possible for a member of
8 the public to pull it off, either through public comment?
9 Like, are we thinking about having a mechanism for that,
10 assuming that people won't just like pull everything off?
11 Like, people will do this in, like, good conscience. Like,
12 we think that we want you to talk about that. Is that
13 something we're considering?

14 And the other thing, this idea that I floated by a
15 few people the other day was, we could also, if we didn't
16 want to do this fully, we could also reorder the way we talk
17 about things and, kind of, make it clear that we're going to
18 quickly go through these particular materials because you
19 know they're non-controversial, and then like leave time at
20 the end. But I -- I think that's a great idea but I think
21 that might just bring us right back to where we were in the
22 fall where we talked, like, excessively about every single
23 material. And so, I mean, it is nice that everyone works so
24 hard and wants to be, like, diligent and cover everything.
25 But, you know, as an economist I will say that is not a

1 costless activity. Thank you

2 SECRETARY LEWIS: Thanks, Carolyn. I appreciate
3 those suggestions. Definitely, let's take a look at all
4 that, particularly as the subcommittees meet, and consider
5 whether to assemble a group vote list or not.

6 Amy, and then Allison.

7 CHAIR BRUCH: Yeah. Thank you for the time here,
8 Nate. Appreciate this topic. And I appreciate the public
9 comments that we received. And I am, you know, just excited
10 that we will be able to have one more round of public
11 comments on this to inform the process. But Nate, your
12 clarification on some of the terminology and the scope was
13 extremely helpful, you know, just to articulate it's a
14 voting efficiency process. So, I think that that helps
15 clear up a few things. The reviews will be very similar.

16 I have a few, just, brief Q&A's I would like to do
17 with you, Nate, in this session if you don't mind? And then
18 I have a couple more points.

19 But I want to ask you, there was a public
20 commenter that said, hey, you know, the board had reviewed a
21 proposal before in the past of something similar. You know,
22 I just wanted to give you the opportunity to distinguish,
23 you know, how this is different compared to what was
24 proposed in the past? And I believe it wasn't a proposal,
25 it was only a it was a discussion document. So could you

1 just quickly articulate the differences?

2 SECRETARY LEWIS: Yeah. So the previous boards
3 considered a discussion document that would group similar
4 substances in a single review. And that my -- my reading of
5 it was that it was about adding some efficiency to the
6 review process, the spring/summer/fall cycle, the -- all the
7 work the board does.

8 Actually, we're start -- you know, we start, kind
9 of, 18 months before we vote on whether or not we need to
10 get an updated TR ordered and those sorts of things, and so
11 the proposal the board has considered in the past, which it
12 rejected following public comments, was to group similar
13 type substances into a single review. And then my
14 understanding is then break them out again for the voting
15 process to vote on them individually.

16 What we're proposing here is to keep the detailed
17 and focused review of each substance the same as it has
18 always been, but to group -- but to consolidate the
19 materials into a single vote. And so I think that's the
20 distinction here; is that the grouping's at the vote in our
21 proposal at the voting stage, as opposed to the grouping
22 occurring in the review stage

23 CHAIR BRUCH: Um-hmm, excellent. Yeah. I
24 appreciate that. And I think that that history -- and I
25 love the public comments forum just to understand archival

1 of history, but for a new board member I think that
2 additional information is helpful.

3 I wanted to ask, you know, last year we passed a
4 proposal for the NOP on inerts, and we don't know, you know,
5 necessarily what the final rule is going to look like there.
6 But I believe there was potential impact to the National
7 List, so could you talk about, you know, potentially the
8 need from a board perspective on introducing some type of
9 efficiency?

10 SECRETARY LEWIS: Do inerts --

11 CHAIR BRUCH: Just if the National List expands.

12 SECRETARY LEWIS: Yeah. Well, I think if --
13 depending on the route that the board -- that the program
14 goes with our inerts proposal, we -- we could be looking at
15 a singular listing with a number of characteristics, or 200
16 more substances, right? And so if it chooses the latter
17 route, I think that there will need to be some, sort of,
18 mechanism in place to, not even make our time together more
19 efficient, but just possible to begin with. I don't know.
20 I mean, I certainly am happy I'm -- if that is the case,
21 that I've completed my secretarial duties on the board
22 because someone else will have to do all the counting of
23 those votes moving forward.

24 So yeah, so yeah, I think in anticipation of -- of
25 that as a potential outcome, having some tools in our

1 toolbox for efficiency is really, really valuable.

2 CHAIR BRUCH: Okay. Last question in this Q&A
3 segment. I appreciate you entertaining these. Would the
4 spring meeting, and just I know you've highlighted this,
5 would the spring meeting process change at all? So what
6 we're doing currently in the spring board meeting would it
7 change at all if we were to implement this in the fall?

8 SECRETARY LEWIS: Yeah. The only difference that
9 I would see would be an additional clarification from
10 substance -- the leads of each substance that whether or not
11 they thought that the material would be eligible for the
12 group vote. Otherwise, it would be the same process in the
13 spring.

14 CHAIR BRUCH: Excellent. Thank you. I have a
15 couple other questions, but Allison, you've been patiently
16 waiting. I'm going to go turn it over to you. And I'll pop
17 back in I'll pop back in.

18 VICE CHAIR JOHNSON: I don't mind either way.

19 CHAIR BRUCH: I'm going to -- I'll pop back in.
20 Go ahead. You might ask what I want to as next. So.

21 VICE CHAIR JOHNSON: Okay, thank you.

22 I just wanted to respond to Franklin and Carolyn's
23 points, which I thought were both very good.

24 One thought on Franklin's point about, like, a
25 summary or something, like -- it makes me -- we haven't

1 articulated exactly how the group vote materials would be
2 introduced into the record in the fall; whether we read the
3 list or what. So one option could be as the subcommittees
4 are screening materials to decide what we would like to
5 propose to put on the group list, the lead for each material
6 could include, like, a one line summary of what the material
7 is. So, like, orient us as we're hearing the list of what
8 is on the group list; that might make it easier for people
9 to, like, trigger oh, yeah, I want to pull that one off or
10 something like that. That could be an option.

11 And then, Carolyn, your point about the public
12 pulling materials off; I think people would be encouraged to
13 call out in their comments if they hear in the spring that
14 we think something is a candidate for a group vote and they
15 strongly disagree with that. They could say that in their
16 public comments for the fall, and that would be feedback
17 that we would take and consider in deciding whether there's
18 something that we want to pull off the list. And you can
19 imagine having one board member in the future who hates this
20 process and pulls every material off the group vote; that
21 would be their prerogative. They would have some probably,
22 like, grumpy fellow board members to answer to afterwards,
23 and hopefully they would have something to say about each of
24 those materials if they did that. But that would be an
25 option that's available. So there's a lot of checks and

1 room to make sure that we discuss anything that anyone
2 thinks needs to be discussed. That's all.

3 SECRETARY LEWIS: Thanks Allison. Amy, I'm going
4 to go to Kathryn, and then I'll circle back with you.

5 So go ahead, Kathryn.

6 BD. MEM. DESCHENES: I just -- what's your vision
7 for, like, okay we're in this group vote, there's this list,
8 how do -- how would people pull things out of the list,
9 like, just in practice, in the fall meeting?

10 SECRETARY LEWIS: I was imagining that Crop,
11 Livestock, and Handling Subcommittee chairs would, you know,
12 either -- I -- I'm -- I like the idea about maybe moving it
13 to the end, they would -- they would present the group vote
14 and basically ask the question on whether any board member
15 has any objections to voting on the list right now? And if
16 they do, which substances should be pulled off? Maybe that
17 could occur at the beginning of each subcommittee meeting,
18 or segment of the board meeting --

19 BD. MEM. DESCHENES: Yeah.

20 SECRETARY LEWIS: -- so then they're addressed
21 individually within the sunset section. Anything remaining
22 on that list would be, you know, deferred to a later vote.

23 I know, I -- the mechanics of which I think we
24 can, kind of, trial within our subcommittees and what sort
25 of makes sense, but that's kind of how I imagined it would

1 work.

2 BD. MEM. DESCHENES: Cool. Yeah, perfect.

3 CHAIR BRUCH: Excellent question, Kathryn.

4 One thing -- or, I guess, I have two other things.

5 Probably, the transparency in the process, I think
6 that was what I really heard from the community through
7 this. Everybody's going to have to be ready for their -- I
8 mean the reviews are going to be taking place, and
9 everybody's going to have to be ready just in case, you
10 know, the mechanics of it are -- something is pulled off day
11 of. But hopefully, you know, after this first meeting we
12 would be able to transparently generate a list and signal to
13 the community.

14 And I -- I just remember in some of my first
15 meetings as a board member, I was mentored to the -- by
16 several for the importance of the discussion in the spring
17 semester on these substances. Just because our board
18 deliberation is an important signal to the community if
19 something is potentially at risk to be delisted, we really
20 have to do our best to early communicate that to the
21 community so we're able to receive the important round of
22 public comments to inform our fall decisions. So I think
23 this -- that structure would really apply equally in this
24 process, as well. We have to do our best to be transparent
25 and signal to the community in regards to what potentially

1 might be eligible for a group vote. But that was, I guess,
2 probably the main thing I wanted to add.

3 And then going back, Allison, you mentioned
4 arsenic. We would be at our first meeting reviewing
5 arsenic. If -- and if Corie -- you know, this is going to
6 be one of her first sunsets, if she wants to take 15 minutes
7 to do it I would be happy to listen. But anyway, in the
8 secondary meeting, I know that's what you're referring to.

9 So go ahead, Nate. I'm going to turn it back over
10 to you.

11 SECRETARY LEWIS: Great. Thanks.

12 I got Corie, and then Kyla. Go ahead, Corie

13 BD. MEM. PIERCE: Thanks. Obviously, I'm going
14 to be learning a lot in the fall meeting of just, like, how
15 the process goes in general, and I just have a question
16 about -- this a little bit further down the road I would say
17 in the process, but I appreciate the need and desire of
18 figuring out efficiency for this whole process to get to
19 more, you know, juicy matters, if you will, without
20 compromising, obviously, the core of what the NOP does.

21 I'm curious if this is -- if this is saving time
22 in the meetings themselves, is -- what is -- it's -- is
23 this -- I guess my question is, is this -- the idea behind
24 this is, like, two-part, in that it saves time in the
25 meeting so that we can do more -- you know, other things in

1 the meeting, like, the TOPP presentations or whatever other?
2 Just have more time for that stuff? And then is it also,
3 sort of, a precedent for continuing to figure out more
4 efficiencies? Because, I ask -- you know, my brain starts
5 going, and again, I'm so new at all of this but I can think
6 of, like, efficiencies in the process because, like, so much
7 of the work is happening, you know, behind the scenes and
8 all the time -- like, individual board members doing all
9 their own research and all their own work and all that, then
10 there's -- there's a lot of potential efficiencies in that
11 process that I can see that would save tremendous amount of
12 time there, too.

13 So, I guess, I'm -- so that two-part if you -- if
14 you understand that.

15 SECRETARY LEWIS: Those are great issues to bring
16 up. And I think we, sort of, need to evaluate. And I think
17 part of what we need to do here is trial something, and then
18 do a retrospective. And like, you know, in the words of
19 previous Board Member Jerry, is the juice worth the squeeze?
20 You know, like, we go through all this process and we write
21 things down and we get folks oriented, and if it saves us 15
22 minutes, I don't know, did that really help? I think that's
23 something we need to be honest and clear with ourselves
24 about.

25 But I -- you know, I think I imagine is that, yes,

1 we may be able to, in the future, schedule a TOPP
2 presentation and an expert panel, because we've saved, you
3 know, literally hours of time at the end of -- when -- you
4 know, the second or third day in terms of voting.

5 I also think it will have a positive effect just
6 on the fatigue of the people on the Board. When you've been
7 sitting in meetings for days and days, and then you're going
8 through a repetition process of voting on substances, it's
9 just -- it's really taxing. And, like, I'm -- you know,
10 I -- we're all strong, smart people, but we have, you know,
11 these human bodies that limit us and what we can take in.
12 And I, you know, just acknowledging that and trying to build
13 in some ways that we don't need to stress ourselves out
14 would be really, really helpful.

15 So those are what I'm imagining. But again, we --
16 you know, until we try something, we don't know if the
17 outcome is actually, you know, achieved. And that's why I
18 think it's worthwhile just to keep considering this.

19 Go ahead, Kyla.

20 BD. MEM. SMITH: Yeah. I can't remember if you
21 said this here while we've been talking, but -- so if I
22 missed it sorry. But we're in this, like, sort of, trial
23 process, right? And so I think that we're -- my
24 understanding is that we're going to present with this in
25 mind, and sort of tee it up, and then PDS is going to,

1 through the work of the subcommittee, going to go back and
2 decide, based on this discussion and public comments, are we
3 going to continue to move forward? And it could be that in
4 subcommittee it "dies" right there, right? And but if we
5 don't, sort of, tee it up at the spring meeting then we
6 can't even move forward at the at the fall meeting.

7 And so I can't remember if you said, that but I
8 just wanted to clarify my understanding and make sure that
9 everybody was on the same page. So.

10 SECRETARY LEWIS: Yeah, totally. You said it
11 exactly right, Kyla. And I don't think if -- I had said it,
12 it's not a problem to be redundant, right? We're -- we're
13 teeing it up, laying the groundwork for this to even be a
14 possibility by going, "I think magnesium hydroxide is a
15 candidate for a group vote in the fall, here are my reasons
16 why. We'll talk about it again in Livestock Subcommittee
17 over the summer." And I think if we end up with Crops and
18 Livestock and Handling only having two substances in the
19 group vote, well, that doesn't really seem like it's going
20 to make a -- too big of a difference. But if there's a half
21 dozen or more in each one, then I think that really could
22 make a difference. So.

23 Well, this is great. Great suggestions and really
24 great questions from folks. I'll put one -- just one final
25 call out for anyone who has a comment or question on this

1 topic, and then hand it back to the chair.

2 All right, well, thanks all for entertaining some
3 new ideas and some new approaches. We'll see how this plays
4 out through subcommittee work over the summer, and hopefully
5 we'll be able to trial something in the fall that could give
6 us all a bunch more time together when we're in person in
7 Omaha. So thanks.

8 Back to you, Amy.

9 CHAIR BRUCH: Excellent. Thank you so much, Nate,
10 for your leadership there. And just the dialogue that the
11 full board engaged in; it was really great. Kyla, Nate,
12 thanks for summarizing, kind of, next steps at the end of
13 that segment, I really appreciate it. And I think that's
14 what we'll try to do on all the subcommittees; is highlight
15 succinctly those next steps.

16 So that brings us to, kind of, the close of the
17 day here. I really appreciate everybody staying tuned and
18 the engagement and just the conversations that we were able
19 to have, both with the NOP update, the TOPP presentation,
20 and then our first debut of our subcommittee deliberation.

21 There is another slide we will talk about.
22 Tomorrow, we're going to be starting at 12 o'clock and
23 that'll be Day 2, so looking forward to it. All right, here
24 it is. And kicking us off tomorrow will be the Handling
25 Subcommittee, followed by the Crop Subcommittee.

1 So thank you kindly for your time today, and
2 looking forward to seeing you tomorrow.

3 MS. ARSENAULT: Thanks, Amy. Thank you everyone.
4 Thank you everyone that hung out online with us; 139 people
5 still on online late in the day.

6 CHAIR BRUCH: Excellent. Yeah. Incredible.
7 (Whereupon, at 4:45 p.m., the virtual hearing in the above-
8 entitled matter was adjourned until Wednesday, April 30,
9 2025, at 12:00 p.m., Eastern Standard Time.)

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1 CERTIFICATION

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3 This is to certify that the attached proceeding before the:
4 NATIONAL ORGANIC STANDARDS BOARD

5
6 IN THE MATTER OF: SPRING 2025 NOSB BUSINESS MEETING Day 1

7 PLACE: Zoom for Government

8 DATE: April 29, 2025

9
10 was held according to the record, and that this is the
11 original, complete true and accurate transcript which has
12 been compared to t  plished at the hearing.

13
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15 _____
16 Elaine M. LaRosee, CDLR

17 Official Reporter
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In The Matter Of:
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
SPRING 2025 BUSINESS MEETING DAY 2

Vol. 2
April 30, 2025



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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC STANDARDS PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

SPRING 2025 BUSINESS MEETING

DAY 2

Wednesday,

April 30, 2025

Held via Zoom for Government

National Organic Standards Board (NOSB) Members

Amy Bruch, NOSB Chair

Allison Johnson, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Kathryn Deschenes

Carolyn Dimitri

Amanda Felder

Andrea Hatziyannis

Cat McCluskey

Dilip Nandwani

Logan Petrey

Corie Pierce

Franklin Quarcoo

Kyla Smith

Javier Zamora (Absent)

National Organic Program Staff, Standards Division

Erin Healy, Division Director

Jared Clark, Assistant Division Director

Andrea Holm, Agricultural Marketing Specialist

Heather Kumar, NOSB Food Technologist

Michelle Arsenault, NOSB Advisory Committee Specialist

Johanna Mirenda, Agricultural Marketing Specialist

Devon Pattillo, Agricultural Marketing Specialist

Jason Edmonson, Agricultural Economist

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(Time: 12:00 p.m.)

CHAIR BRUCH: Good morning everybody. Good afternoon to those on the East Coast. I'm Amy Bruch, and I am the Chair of the National Organic Standards Board. Welcome to Day 2 of our Spring 2025 meeting. We had a fantastic day yesterday with the NOP update, the TOPPP presentation, and our first subcommittee report which was the Policy Development Subcommittee.

I'm just wanting to note there's a few slides that you can see in front of you, but if you are having any audio trouble or camera trouble or any kind of trouble, just to annotate that there is both a Zoom link and a call-in number, so you can participate in various forms.

Before we officially get started, and I'm hoping the next slide is going to be our agenda, but just to talk about what's in store today is our Handling Subcommittee. Thank you Andrea and Michelle. Our Handling Subcommittee will be kicking off subcommittee presentations, discussions, and votes, and then our Crops Subcommittee will be following next.

And then tomorrow we will catch up with the rest of the Subcommittees, Livestock, Materials, CACS -- Compliance, Accreditation, and Certification. We will tackle any deferred votes. We'll review the upcoming NOSB work agenda and materials update, have time for other

1 business and closing remarks. That's kind of the next two
2 days.

3 Before we get started with Handling, I'd like to
4 just open it up to a quick icebreaker to get everybody
5 warmed up here on the team. I'm going to call on a few
6 members, and what I would like to have you inform the
7 audience and our Board is just what observations or
8 highlights that you'd like to elevate from yesterday's
9 conversations.

10 So I will start with Allison first on this
11 icebreaker.

12 VICE CHAIR JOHNSON: Thanks, Amy.

13 Good morning, everyone. I just can't gush enough
14 about TOPPP. I was involved in getting the Organic
15 Transition Initiative off the ground, and I'm just amazed at
16 how much work has been done, how much everyone just dug in
17 and created this program. A lot of the infrastructure and
18 pieces were there, but bringing them together in a
19 systematic way and really showing that with a pretty small
20 amount of proactive outreach we can put organic in reach for
21 so many more farmers and eventually so many more consumers.
22 It's just so exciting, and I'm so proud of the success and
23 so grateful to everyone who's been involved in it. So I'm
24 glad we're continuing to make space to hear these TOPPP
25 updates at the meetings, and just big kudos to all of you,

1 and thank you again for the presentations yesterday.

2 CHAIR BRUCH: Excellent, Allison. Very well said.

3 Corie, I'm going to put you on the spot now. You
4 had one day under your belt already. What were your
5 observations?

6 BOARD MEMBER PIERCE: Gosh, so much to learn, and
7 just excited about just being part of the process and
8 continuing to learn. Also, on the TOPP presentation as
9 well, I farmed most of my career and life in the Northeast
10 in New Hampshire and then now in Vermont on my own farm, but
11 I also farmed briefly in California and at Michigan State
12 University where I worked for a few years. It was just
13 really exciting to hear from -- I guess I'm just struck with
14 the huge, wide diversity of types of farmers, scale of
15 farmers that we have across this country as was highlighted
16 by TOPP. Also, the connections are so deep. There were
17 several people who spoke who I actually have personal
18 connections to -- they probably don't even know it -- and
19 it's just because of how tight this network -- and also
20 small. So it's like a very small network that also has just
21 so much explosive, huge potential that we've also been
22 talking about, so that was fun to see that in different
23 ways.

24 CHAIR BRUCH: Well, Corie, thanks for elevating
25 that and definitely excited for you and the other members of

1 your class to be a part of this. It's been fun journey
2 having the new members on Board.

3 Speaking of new members, Amanda, I'm going to go
4 to you next, put you on the spot.

5 BOARD MEMBER FELDER: No worries. So I think
6 everyone is going to say TOPP, but it warms my heart so much
7 to see the growth and the change in the industry. I think
8 Chris Barnett said it best where, you know, farmers tend to
9 hold their secrets close to the vest, and it's what
10 proprietary information you do have, right? But we're quick
11 to look over the fence to see what your neighbor's doing.
12 And so when your neighbor sees that you're doing something
13 different, and it's positive, they start asking questions
14 and they want to know what you're doing.

15 And I think organic tends to be a little bit more
16 open -- not always -- but we're more open to sharing what
17 challenges we've already solved. And so if we're able to
18 work together and say, hey, I've already solved this
19 problem, you don't need to fight the same problem, I already
20 have the answer. And we're willing to share that
21 information.

22 You know, having TOPP bring people together to
23 have that network where you might not be more proactive to
24 Google or hunt down people or have the time to show up to
25 different industry events to make those friends, that's such

1 a huge burden that we're able to solve amongst ourselves.
2 And I just love seeing that and seeing those relationships
3 build.

4 CHAIR BRUCH: Yeah, thank you for elevating that.
5 Yep. As farmers, we only have a limited time in our lives
6 to do what we love. In the Midwest, one chance a year. So
7 in other areas, you're a little more fortunate, might have a
8 couple of windows, at least in Logan's area. But anyway,
9 yeah, definitely important to network and not reinvent the
10 wheel.

11 Okay. Carolyn, I see you are just getting ready
12 and set up, and I'm just trying to do my job of keeping
13 everybody alert and on their toes. So can you tackle an
14 observation that stuck out to you from yesterday that you'd
15 like to elevate?

16 BOARD MEMBER DIMITRI: Yeah, I was actually
17 stunned that so many organic peanuts were being grown in the
18 state of Texas. I had no idea. So I thought that was cool.
19 I was really hoping you'd ask me the other question, Amy.

20 CHAIR BRUCH: Oh, well, there'll be time for more
21 questions for you, Dr. Dimitri. Anyway, okay. Let's see.
22 And speaking of organic peanuts, if you guys recall, a
23 couple NOSB comment sessions ago we had a farmer, an organic
24 farmer from Texas talking about peanuts in his farm in the
25 markets.

1 Last person, before we dive into the Handling
2 report, I'm going to call on Dilip. I want to understand
3 from your point of view what stuck out from yesterday's
4 conversations.

5 BOARD MEMBER NANDWANI: Oh, so everybody spoke
6 about TOPP, and I think I mentioned yesterday I'm also part
7 of Midwest TOPP, and I like this program. I really admire,
8 you know, that USDNOP, they came up some time ago, a couple
9 of years ago, and brought this funding for the countrywide
10 and in six regions. And I was really impressed to see the
11 impact report I went through yesterday, and because I also
12 had the impact report from Midwest. So it's really
13 impressive that in just a couple of years how much progress
14 had been made and impacted, you know, the organic community
15 nationwide. So that's one thing.

16 And just going before that, I really appreciate
17 the public comments, you know, last week, a lot of comments.
18 And although we had not much time -- and, honestly, until
19 this morning I was reviewing, going through public comments
20 -- but I really appreciate our stakeholders and community
21 that they spent so much time, and they really gave very good
22 input on these various topics. And some of them, they are
23 very challenging, as we all know.

24 And I'm going to say before I stop here that,
25 Michelle, I'm going to miss my organic chocolates and

1 sweets. If I was in person, I would have enjoyed that.

2 So thank you, Amy, for just giving me an
3 opportunity to speak and give my two cents here. Thank you.

4 CHAIR BRUCH: Absolutely, Dilip. Thank you for
5 bringing those points up to discussion and just elevating
6 our public commenters in our community. It's definitely a
7 joint effort in material review and all the other topics
8 that get brought up into our work agenda, so thank you for
9 highlighting that.

10 All right. I am going to turn it over to Allison,
11 our Vice Chair of the Board and our Chair of Handling.
12 Thank you for doing double duty here. And I'll just let you
13 kind of facilitate the Subcommittee section. Thank you,
14 Allison.

15 HANDLING SUBCOMMITTEE

16 VICE CHAIR JOHNSON: Thanks, Amy. Good morning,
17 everyone -- almost afternoon. I can't keep track of where I
18 am, what time zone, or what's going on. But I am excited to
19 spend some time today on our Handling Subcommittee.

20 We have a lot of new Handling expertise on the
21 Subcommittee with Amanda, Andrea, and Kathryn joining us.
22 So I'm really excited to have their contributions in the
23 mix, and I think it's going to be a really great year.

24 We have another very full roster of sunsets this
25 year, so reviewing materials continues to be the

1 Subcommittee's main focus. But I do want to acknowledge
2 we've received a petition to add chitosan to the National
3 List, so we've done our initial review for sufficiency, and
4 we're waiting for a TR for that material so we can continue
5 our review.

6 And just echoing what Dilip raised up, I'm really
7 grateful to our public commenters and particularly the
8 attention to detail, the institutional memory that folks
9 bring, and the depth of expertise that continues to come
10 through in the Handling comments meeting after meeting. We
11 really appreciate your input and rely on you and encourage
12 you to keep it coming. It's extremely valuable to this
13 process, so thank you.

14 We're going to start with a couple of proposals,
15 and then we have one discussion document, and then we have a
16 bunch of sunset reviews to move through. And just a
17 reminder on the sunset reviews, we're going to start tying
18 out this new efficiency process, so leads on sunset
19 materials will know if they think a material might be a
20 candidate for a group vote in the fall. And I and hopefully
21 Nate will try to remind you to do that if it doesn't come
22 naturally.

23 PROPOSAL: ETHYLENE - ANNOTATION CHANGE

24 And so our first item on the agenda is a proposal
25 to change the annotation of ethylene, and I will hand it to

1 Logan for that discussion. Thank you.

2 BOARD MEMBER PETREY: Yeah, great. Thank you.

3 Also, I want to say thank you to Nate, who is not
4 on the Handling Subcommittee this semester. He is actually
5 the author of this document, and I thought it was extremely
6 easy to read. It was very clear. I appreciate it.

7 Also, you know, ethylene is not something that we
8 all are unfamiliar with. I think it was two years ago we
9 had ethylene come up as a sunset in crops for the flowering
10 of pineapple -- which was actually my material -- and we
11 also had it in Handling for the de-greening and the ripening
12 of citrus crops. So the de-greening of citrus and -- sorry
13 -- the ripening of tropical fruits. I think that was
14 Kyla's, but I can't quite remember that one.

15 However, so we had a full scope TR done. And so
16 with this petition that we received last year -- or I think
17 it was in August, actually, of 2023 -- Nate asked for and
18 Handling Subcommittee asked for a TR -- a limited scope TR
19 -- specifically towards the application or the process for
20 potato sprouting and onion sprouting, and that is to prevent
21 the sprouting. And so I'll go just into details of the
22 proposal, some in the TR, and then we will also have Nate
23 come in, and he can answer probably a lot of questions if
24 people have them.

25 But okay. So yes, in August 2023, the

1 manufacturer of equipment that generates ethylene gas from
2 ethanol submitted the petition to expand its use. So this
3 is changing the annotation to allow for the use in potatoes
4 and onions in storage. So this is not used in the
5 processing. This is strictly used in storage.

6 The manufacturing specifically in the petition was
7 from an on-site ethylene generator, using a catalytic
8 conversion of ethanol, but ethylene is also manufactured of
9 pyrolysis of petroleum hydrocarbon feedstock. So both of
10 these are synthetic, although they are identical to
11 naturally occurring ethylene.

12 It does not appear to have any detrimental
13 chemical interactions with other materials used in organic
14 farming because this is used in storage. There are no
15 negative effects of ethylene on invertebrates or birds,
16 which are most likely to be exposed to the ethylene.

17 Ethylene used in ripening, greening, or sprout
18 prevention ultimately remains in the atmosphere, only
19 negligible amounts for the partition of soil, water, and
20 sediment, so it's unlikely that there will be any pollution
21 or any contamination. Also, this is a volatile material,
22 and so we're not looking at it being like a chemical put on
23 the potato, so there's not going to be any residue for
24 whenever you're purchasing the potato or the onion.

25 It is not known how much global production of

1 ethylene is used for fruit ripening or de-greening and also
2 for the sprouting, but it is very little compared to other
3 industrial manufacturer uses of ethylene. Since ethylene is
4 used for preventing sprouting of potatoes and onions, it
5 does not end up in the soil. Its effects on soil organisms
6 are negligible.

7 So for alternatives and compatibility and potato
8 and onion cultivation, a number of practices are used. So
9 when you're in storage, there are other things that you can
10 do. A lot of the timing for these crops is very important,
11 and because ethylene is not the silver bullet to making sure
12 that these crops are not going to degrade in storage, or
13 preventing sprouting or maturing, breaking down, the growers
14 are typically handling the crop in storage.

15 They are going to have to use other strategies --
16 and that's the better varieties that are going to hold in
17 storage -- that is harvesting carefully and not bruising or
18 damaging the crop. It's also make sure that it's not wet so
19 that there's a lot of free moisture on the crop itself. The
20 humidity has to be a certain level. The temperature has to
21 be a certain level in storage. And also making sure that
22 you harvest at the right time and maturity so that it can
23 hold well. So there's still other things that have to be
24 done to maintain the integrity of that crop.

25 Also, it's to be noted that whenever a crop is

1 sprouted, or a potato or an onion does sprout, and it's
2 going to the consumer, it does lose significant nutritional
3 value because all of that nutritional value that's in the
4 crop is going towards the sprout, which is something that
5 you're peeling off. So the nutritional value is less, then,
6 when you have sprouting.

7 Potatoes and onions are seasonal crops. They
8 typically, in most regions, only have one growing season.
9 Actually, here in North Florida, South Georgia, we have two
10 for potato. We only have one for onion. So onions are a
11 particular specific because they bulb, they swell, based on
12 day length, and so in its timing, it's really important. So
13 with the heat that we get in the summer, we really are
14 strictly only using what they call short day onion, and so
15 it triggers -- our harvest window is between March and May,
16 maybe a little bit in June.

17 So when you're doing regional production and
18 you're keeping things local, we're going to have to have
19 that onion in storage for months, and so maintaining its
20 integrity in storage is extremely important. Otherwise,
21 you're going to have to get onions from across the country
22 or from a lot in Peru. Peru imports a lot of onions during
23 that winter time. And so being able to extend the shelf
24 life is really going to help regional areas.

25 The same for potatoes. So potatoes are in our

1 area for two different seasons. We have the spring and the
2 fall. And you have to be specific. They are not cold
3 tolerant, so the tops will die in a hard freeze. And the
4 soil temperatures can't be too hot when you're planting or
5 they will rot. So it's really important, the timing. And
6 so being able to manipulate that with the material that we
7 already have approved in other things, that is volatile,
8 that is low human health effects, it seems to be like this
9 could really, really help.

10 And as far as the -- I talked to Nate -- it seems
11 to be a novel material. People are starting to use this in
12 the conventional world. It's starting to help alleviate
13 some of the chemical use. So that's why it's kind of coming
14 on is, hey, this is actually a new material that we can be
15 using.

16 And so, okay, with that, I am actually going to
17 open it up, or I'm going to hand it back to Allison, let you
18 continue to facilitate this. Thank you very much to
19 everybody.

20 VICE CHAIR JOHNSON: Thanks so much, Logan.
21 Really helpful to have your expertise and kind of detailed
22 knowledge of what this looks like on the ground and what it
23 would mean in your region.

24 Do we have any comments or questions? Hoping hand
25 raising will pop to the top of my screen. I see Nate and

1 then Cat.

2 Go ahead, Nate.

3 SECRETARY LEWIS: Yeah. Thanks, Logan, for the
4 handoff. Just some context there that, with the new Board
5 members, we did some reshuffling of subcommittee
6 assignments. So I transitioned off of Handling as new
7 members came on and was able to hand off this to Logan. So
8 I really appreciate you carrying the torch there.

9 I think I wanted to just stress a little bit on
10 the public comments that we did get a lot of public comments
11 from growers and handlers of onions and potatoes expressing
12 interest in having this tool available to them and sort of
13 dissatisfaction with the currently available natural
14 alternatives, primarily clove oil as a sprout inhibitor.
15 That's typically used more in potatoes than it is -- or
16 spuds as we like to call them up here in Washington state.

17 So I think it just sort of -- I just want to
18 acknowledge that there is tension with this material in that
19 it is a synthetic alternative to a natural substance for
20 control. But -- and sort of anecdotally -- what we heard
21 was that the natural substance, primarily clove oil, is
22 unpleasant to work with and causes irritation in farm
23 workers who are applying it. And anecdotally, we heard it
24 doesn't have much -- it's not very effective, which was
25 corroborated by the technical report.

1 So I just wanted to acknowledge that, that there
2 is this tension where we're evaluating a synthetic substance
3 which could replace a natural alternative, but the natural
4 substance appears to be fairly ineffective and potentially
5 more harmful to worker health in the way it's being applied.
6 And just having spent a bunch of time focusing on this, if
7 there are questions from the Board, I'm happy to respond to
8 them.

9 VICE CHAIR JOHNSON: Thanks for all your work,
10 Nate, to see this material through and to hand it off to
11 Logan and sort of transition beautifully. I really
12 appreciate you. Thanks for the comments.

13 Cat, go ahead.

14 BOARD MEMBER MCCLUSKEY: Great. Thanks, Logan and
15 Nate.

16 I have two quick questions. My first question is
17 just a point of clarification coming out of some of the
18 public comments. I just wanted to confirm that ethylene for
19 inhibiting sprouting in potatoes and onions is approved in
20 EU and Canada. Is that correct in organics?

21 SECRETARY LEWIS: That's correct, yeah.

22 BOARD MEMBER MCCLUSKEY: Okay. And then my other
23 question is I'm wondering if anybody on the Subcommittee has
24 spoken with any potato or any onion breeders about cultivar
25 development selected for increased durability, particularly

1 to prevent sprouting?

2 SECRETARY LEWIS: I think I can respond partially
3 to that. So directly answering your question, I don't
4 believe we have heard directly from breeders of potatoes and
5 onions in relation to this material. However, the TR did
6 identify ethylene as a potential supportive material for
7 seed potatoes so that when it comes time to plant those
8 potatoes there's still resources available in the seed
9 potato and the performance that they're seeking can be met.

10 And as Logan pointed out, many of these producers
11 are already using growing techniques to extend storability
12 -- if that's a word -- and one of those techniques is just
13 general well-being of the plant and vigor. So having a good
14 seed potato is the first piece of the puzzle in getting a
15 good potato that will store, and I think that performance
16 issue is why there hasn't been as much growth in seed potato
17 production. This may unlock that.

18 I'll also sort of postulate that, since onions are
19 a biennial and you need to store that bulb over the winter
20 to get seed the following year, this potentially could be a
21 boon to onion -- it might unlock some capacity in the onion
22 seed market as well.

23 BOARD MEMBER MCCLUSKEY: Yeah, thanks Nate. I
24 agree. I think that makes good sense to me. I'm wondering
25 if, as a balance -- sort of a long game for future use of

1 ethylene or removing future use of ethylene -- I'd just like
2 us to consider maybe adding to the research priorities
3 potato and onion cultivar development for organic systems
4 including selection for storage quality and sprouting.

5 SECRETARY LEWIS: Yeah, I think that's great.
6 Noting that for handling and research priorities is a good
7 idea.

8 VICE CHAIR JOHNSON: Yeah, great suggestion, Cat.
9 And you can imagine maybe down the road there's some
10 innovation that makes the ethylene less useful or needed and
11 that would continue to be examined in the sunset process
12 every five years.

13 Okay, we've got some new hands. Andrea, then
14 Brian, then Amy.

15 BOARD MEMBER PETREY: Hey, Allison, I'm sorry.

16 VICE CHAIR JOHNSON: Yeah?

17 BOARD MEMBER PETREY: I was going to also mention
18 for the sprouting, because you actually want to be able to
19 reverse or you want to maintain its ability to sprout the
20 potatoes, and so some materials that are used have more of a
21 permanent change in the potato, and so it may alter its
22 ability to even sprout. And so ethylene doesn't have that
23 effect, so this actually could help a lot. But that's in
24 the potatoes.

25 The onions, I think it's kind of in the same

1 category too that, yeah, so it's going to dissipate, it's
2 going to go away, and then it kind of starts its normal
3 function again as sprouting instead of some kind of
4 permanent damage to that.

5 VICE CHAIR JOHNSON: Logan, thank you. So it's a
6 temporality issue in addition.

7 Okay, Andrea, go ahead.

8 You're still muted.

9 BOARD MEMBER HATZIYINNIS: Apologies.

10 We have heard from the potato growers the
11 challenges of storing, and so this would allow for more
12 production in the U.S. and for them to store longer,
13 elongating the season? Is that correct? And is this
14 comparable to the methods they use for non-organic? Like,
15 is ethylene a common method in non-organic, or would it be
16 specific to the organic? Just me learning about the
17 potatoes.

18 SECRETARY LEWIS: No, yeah, that's a great
19 question. Let's see. So it's a little different between
20 spuds and onions. So for spuds, it would extend the window
21 of time that they can market their product. For onions, my
22 understanding is that the various regions of the country
23 sort of have their own marketing window, and they try not to
24 step on each other's toes because each one sort of
25 specializes in whatever, November to January, and then, you

1 know -- that's Washington. I'm sort of making this up, but
2 each region kind of has its own marketing window. And for
3 onions, it would reduce the amount lost to spoilage during
4 that window. So it's a little bit nuanced in terms of its
5 direct impacts on those two separate industries.

6 And then, in terms of experience, my understanding
7 is that ethylene is not commonly used in conventional
8 production in the U.S., but it is in the U.K. and the E.U.
9 because they've lost access to some storage chemicals that
10 are commonly used and remain in use in conventional
11 production here in the States. So there's experience in the
12 E.U. and U.K. where they've sort of phased out some
13 chemicals, and that's sort of what they're drawing from here
14 in the U.S. for potential inclusion on the list for organic.

15 BOARD MEMBER HATZIYINNIS: Okay. This is helpful.
16 Thank you.

17 BOARD MEMBER PETREY: I think it's so true about
18 the onions and their own windows, because I'm a girl close
19 to Vidalia onion. I mean, there's parades for it, you know,
20 that they have, so I mean it is very near and dear to people
21 to stay in that. Yeah, it does seem to be kind of an
22 accepted thing. So but they do fade out, you know,
23 especially the sweet onion which is softer and doesn't have
24 the sulfur that's needed for this long-term storage.

25 VICE CHAIR JOHNSON: I love a good food parade.

1 I'll just add I noticed in public comments,
2 specifically the Washington State Potato Commission flagged
3 that for conventional a common method using chlorpropham
4 which is banned in the EU because of concerns about
5 endocrine disruption. So it sounds like ethylene is likely
6 to be a safer alternative to that, which we love to see.

7 Brian, go ahead.

8 BOARD MEMBER CALDWELL: Thanks, Allison.

9 Yeah, just to chime in on the storability of
10 various cultivars, as a former small-scale vegetable grower
11 who marketed locally, definitely there are cultivars of
12 onions that are well-known as good storage onions and a
13 bunch that aren't, and so that's a decision that is really
14 important to the growers. We didn't participate in these
15 national market windows that are being talked about here,
16 but we wanted a long storage product, so that's for sure.

17 I think the same thing is true with potatoes to a
18 lesser extent, and I think the big issue is that the
19 genetics can prolong storage life but it's kind of a limited
20 tool. It won't do as much as ethylene storage would in
21 terms of prolonging the useful life of the crop.

22 VICE CHAIR JOHNSON: Great. Thanks, Brian.

23 Amy, go ahead.

24 CHAIR BRUCH: Yeah, thank you, Brian. I was happy
25 to see, you know, just kind of all sides of the equation

1 that were represented from our public comments, and I
2 particularly honed in on some of the grower comments.

3 There was a state potato commission that also
4 contributed, and I thought this was really interesting in
5 terms of alternatives. You know, they mentioned these
6 essential oils -- and Allison, you brought up one point
7 about that -- is that they can only be applied to tubers
8 that have broken dormancy or sprouting, so it's almost a
9 little bit reactive is how I understand the application of
10 these essential oils.

11 And then also, I did find through the public
12 comments that the essential oils are not effective on
13 onions. They can't use them for various reasons. So I'm
14 not aware -- and maybe, Nate or Logan, you have more
15 information on this -- but the actual application of the
16 essential oils for use in onions, from what I could gather
17 from the public comments, it seemed like there wasn't a fit
18 there. So just wanted to bring those two points up.

19 SECRETARY LEWIS: Yeah, I don't believe that those
20 essential oils are used in onion storage.

21 BOARD MEMBER PETREY: Yeah, they use carbon
22 dioxide in onions. They cannot use them in potatoes.
23 They'll actually damage potatoes. But I guess carbon
24 dioxide is suppressing the microbial growth maybe. I don't
25 know that it necessarily affects the sprouting. So I think

1 it's also just, yeah, they use things that inherently help
2 prevent the sprouting that are helping with the lack of
3 decomposition of it, but you're right, no oils.

4 CHAIR BRUCH: All right, and I just want to say
5 nicely done, the transition and the handoff. Nate, thank
6 you for your contributions on this, and Logan, thank you for
7 representing it currently. Really appreciate that.

8 VICE CHAIR JOHNSON: Thanks, Amy. I'll just add
9 my last two cents here, seeing no more hands. There was
10 also a comment from a handler who was thinking about adding
11 more organic processing capacity, and who thought that the
12 addition of this material would stabilize the supply and
13 potentially bring in enough traffic that it'd be worth their
14 while to add a certified organic line, which is something we
15 love to see. So that's my positive.

16 And then I wanted to appreciate comments about who
17 benefits, whose markets could be harmed, really through the
18 regionality issue and what impacts this might have of
19 different scale growers in different places, so appreciate
20 having that in the mix.

21 For me, I'm thinking about this material kind of
22 the same way I thought about it in the sunset review, which
23 is I don't love changing sort of the natural season of a
24 product as a consumer, but often the alternative then is we
25 don't have the organic option available, and we buy more

1 conventional, and I don't think that's ultimately the
2 outcome that we're working toward here. So it seems like
3 this is a material that could really increase availability
4 of organic onions and potatoes and allow them to be used in
5 more applications, so that seems like all around a positive.

6 Are there any more comments or discussion?

7 BOARD MEMBER PETREY: You know, just to comment on
8 that, Allison, it is a great point because we don't want to
9 push something out of its natural window. I think that
10 people do push the storage regardless, so I don't know that
11 it will necessarily extend it even further by a lot. But
12 what it'll do is reduce the loss and the spoilage of that
13 attempt to push that storage because, you know, we've been
14 storing onions and potatoes for a very long time just
15 because we were able to do so.

16 So maybe this, you know, one way to look at it is
17 that it's actually going to protect the nutritional value
18 and lessen the spoilage of that attempt because I think
19 that's going to happen anyway. But, no, those are great
20 points.

21 VICE CHAIR JOHNSON: Thanks, Logan.
22 Really helpful context.

23 All right. Any more discussion?

24 (No response.)

25 One point of clarification that we wanted to

1 confirm with the NOP, we didn't do a classification vote for
2 this material since it's already on the National List.
3 Just want to double check that that's correct and we don't
4 need to vote to classify the synthetic status of the
5 material, just the annotation change.

6 Jared or anyone, can I get a thumbs up?

7 Michelle, thumbs up. Okay, great.

8 Thumbs up from Jared, too. Perfect. Thank you.

9 Okay. So then, Amy, I think we're ready to hand
10 it back over to you for a vote.

11 CHAIR BRUCH: Okay. Excellent. Good discussion,
12 Allison. Thanks for that clarification there.

13 So we are working on ethylene as an annotation
14 change. This motion is before you. So we are going to be
15 voting on a National List motion to amend ethylene at
16 205.605(b)(14). I'm going to read it for the record.

17 Ethylene allowed for post-harvest ripening of
18 tropical fruit, de-greening of citrus, and post-harvest
19 sprouting inhibition of potatoes and onions.

20 This was motioned by Nate Lewis and seconded by
21 Kyla Smith.

22 We will start our voting with Brian.

23 BOARD MEMBER CALDWELL: Just to be clear on this
24 one, if we vote yes, we're in favor of it, right?

25 CHAIR BRUCH: Correct.

1 BOARD MEMBER CALDWELL: Yes.

2 CHAIR BRUCH: Thank you. Thank you for all
3 members for just bringing that up. It's been a -- you know,
4 we have to dust off the cobwebs on our voting cadence and
5 what we are voting for.

6 So thanks, Brian.

7 BOARD MEMBER CALDWELL: So it was yes.

8 CHAIR BRUCH: Okay. Kathryn.

9 BOARD MEMBER DESCHENES: Yes.

10 CHAIR BRUCH: Carolyn.

11 BOARD MEMBER DIMITRI: Yes.

12 CHAIR BRUCH: Amanda.

13 BOARD MEMBER FELDER: Yes.

14 CHAIR BRUCH: Andrea.

15 BOARD MEMBER HATZIYINNIS: Yes.

16 CHAIR BRUCH: Allison.

17 VICE CHAIR JOHNSON: Yes.

18 CHAIR BRUCH: Nate.

19 SECRETARY LEWIS: Yes.

20 CHAIR BRUCH: Cat.

21 BOARD MEMBER MCCLUSKEY: Yes.

22 CHAIR BRUCH: Dilip.

23 BOARD MEMBER NANDWANI: Yes.

24 CHAIR BRUCH: Logan.

25 BOARD MEMBER PETREY: Yes.

1 CHAIR BRUCH: Corie.

2 BOARD MEMBER PIERCE: Yes.

3 CHAIR BRUCH: Franklin.

4 BOARD MEMBER QUARCOO: Yes.

5 CHAIR BRUCH: Kyla.

6 BOARD MEMBER SMITH: Yes.

7 CHAIR BRUCH: Javier. Absent.

8 And the Chair votes yes.

9 SECRETARY LEWIS: 14 yes, 0 no, 1 absent. The
10 motion carries.

11 And if I may, I'd also like to point out that our
12 new retailer just voted for sprout inhibition from Sprouts
13 Market. So I kind of can't resist but point that out.

14 So congratulations on your first vote, Andrea.

15 BOARD MEMBER HATZIYINNIS: Thanks. Love all the
16 Sprouts jokes.

17 VICE CHAIR JOHNSON: Thanks, sir. Keeping track
18 and doing the levity, Nate.

19 Amy, did I need you to do anything to close that
20 out, or shall we move along with the Handling agenda again?

21 CHAIR BRUCH: Yeah, I think we're just ready to
22 move on. Thanks, Allison.

23 VICE CHAIR JOHNSON: Excellent. Thanks, team.
24 First vote successfully under our belt for this meeting.
25 That's good.

1 PROPOSAL: FISH OIL CAS#

2 VICE CHAIR JOHNSON: Okay. Next up, we have a
3 slightly unusual proposal. This is for technical correction
4 of the fish oil listing. And for this, Dilip will lead us
5 through.

6 BOARD MEMBER NANDWANI: Allison, do you want me to
7 go ahead?

8 VICE CHAIR JOHNSON: Yes. Go ahead, please,
9 Dilip.

10 BOARD MEMBER NANDWANI: Thank you. Okay. This
11 should be a fairly simpler proposal than ethylene.

12 In the fall semester, a stakeholder brought to the
13 Board's attention a technical correction in the fish oil
14 listing at 7 CFR 205.606. The listing includes two fatty
15 acids' CAS numbers. However, fish oil itself does not have
16 a CAS number. So in response to Petition Question 8
17 regarding CAS numbers, the 2007 petition to add fish oil to
18 the National List stated: Fish oil that is the subject of
19 this petition is a mixture of fatty acids. Therefore, no
20 Chemical Abstracts Service has registry number exists for
21 this substance.

22 The 2007 NOSB recommendation to add fish oil to
23 the National List only recommended adding fish oil to 7 CFR
24 205.606. During the 2024 sunset review of fish oil, the
25 NOSB received a public comment that noted the CAS numbers in

1 the listing are incorrect.

2 So the Subcommittee appreciates the public comment
3 that brought this issue to the NOSB's attention. And upon
4 reviewing, it appears that the CAS numbers included in the
5 listing describe individual components of the fish oil, but
6 not fish oil itself, and were included in the listing in
7 error.

8 Since the listing is for fish oil, and the NOSB's
9 recommendation was to add fish oil -- not its individual
10 components -- to the National List, the Subcommittee
11 recommends removing the CAS numbers as a technical
12 correction to the listing. And the public comments,
13 recently those were closed. Two of them supported removing
14 the CAS numbers, and one comment recommended annotation.

15 That's all I have, Allison. And if you want to
16 add anything that I have missed, please feel free to do so.

17 VICE CHAIR JOHNSON: Thanks, Dilip.

18 Dilip did a great job navigating. This is sort of
19 an unusual comment that came up in the fall, and we had to
20 figure out, following that meeting, how to deal with it
21 after the sunset. So I appreciate you taking this on.

22 I'll just add a little color on the public
23 comments. We did have two public commenters who said that
24 actually there is a CAS number for fish oil. In fact, there
25 are CAS numbers for multiple types of fish oil. So the

1 original statement in the petition to add fish oil, that
2 there is no CAS number for fish oil, is incorrect. So if we
3 move ahead with the vote today, we can correct that in the
4 written document and acknowledge those public comments.

5 There was one suggestion to add a particular CAS
6 number for fish oil, and there was another suggestion to add
7 that CAS number and others that are similar as the
8 annotation. And from where I sit, I think the value of
9 including a CAS number in a National Listing is to prevent
10 confusion. So if there might be multiple materials, and we
11 only want one specific material to be included, that's where
12 I think a CAS number adds value.

13 Here, since it seems that there are multiple CAS
14 numbers for fish oil, it's not clear sort of what that
15 universe looks like, and it is clear from the original
16 petition that the whole kind of world of fish oil was
17 intended to be captured by this listing. I think the
18 proposal to go ahead and just strike the CAS numbers
19 completely still makes sense.

20 About half of the materials on the list have CAS
21 numbers and half don't. It seems to be somewhat random
22 whether they've been included or not. So here, I don't
23 think listing a CAS number adds any particular clarity or
24 narrows the universe in any way that's necessary, so it
25 seems fine to me to leave it off.

1 Brian, I saw your hand up and then down. Did I
2 answer a question for you, or did you still have a comment?

3 BOARD MEMBER CALDWELL: You sure did. You
4 answered the question perfectly.

5 VICE CHAIR JOHNSON: Great. Perfect. Thank you.
6 Amy, go ahead.

7 CHAIR BRUCH: Sure. Thanks, Allison.

8 Dilip, nicely done. Thank you for walking us
9 through that.

10 And Allison, thanks for summarizing some of the
11 questions that I also had. One thing you did mention -- I
12 think this is a great opportunity for more training for all
13 of us -- you mentioned a small, slight change to the
14 proposal document that we all have in front of us, and I
15 think you mentioned the word non-substantive. So can you
16 just walk us through when we can make minor corrections, and
17 when we cannot and these documents need to get sent back to
18 subcommittee? I'm going to turn it back over to you for
19 this lesson. Thank you.

20 VICE CHAIR JOHNSON: And I lean on you, Amy, as
21 well.

22 So sometimes in these meetings, we've put up a
23 slide where we do strikethrough language and agree that
24 there's a non-substantive change to the proposal. We didn't
25 do that here because the proposal remains the same. But I

1 do think we would add, as we typically do, an
2 acknowledgement of public comments and discussion into the
3 final document that will be part of the public record going
4 forward. So here it would be to acknowledge that originally
5 we said that there is no CAS number for fish oil, and then
6 we got additional information that might be incorrect. And
7 there are indeed CAS numbers, plural, for fish oil.

8 CHAIR BRUCH: Thank you, Allison. Appreciate
9 that.

10 VICE CHAIR JOHNSON: Any other questions for
11 discussion on this one?

12 (No response.)

13 VICE CHAIR JOHNSON: All right. Seeing no more
14 discussion, hand it back to you, Ms. Chair.

15 CHAIR BRUCH: Okay. Thank you, Allison.

16 Thanks again, Dilip.

17 Right now, there is a motion to eliminate CAS
18 numbers included in fish oil listing at 7 CFR 205.606 as a
19 technical correction. So it reads: Fish oil stabilized
20 with organic ingredients or only with ingredients on the
21 National List, 205.605 and 205.606. It was motioned by
22 Allison Johnson and seconded by Dilip.

23 All right. The voting actually starts with
24 Kathryn.

25 BOARD MEMBER DESCHENES: Yes.

1 CHAIR BRUCH: Carolyn.
2 BOARD MEMBER DIMITRI: Yes.
3 CHAIR BRUCH: Amanda.
4 BOARD MEMBER FELDER: Yes.
5 CHAIR BRUCH: Andrea.
6 BOARD MEMBER HATZIYINNIS: Yes.
7 CHAIR BRUCH: Allison.
8 VICE CHAIR JOHNSON: Yes.
9 CHAIR BRUCH: Nate.
10 SECRETARY LEWIS: Yes.
11 CHAIR BRUCH: Cat.
12 BOARD MEMBER MCCLUSKEY: Yes.
13 CHAIR BRUCH: Dilip.
14 BOARD MEMBER NANDWANI: Yes.
15 CHAIR BRUCH: Logan.
16 BOARD MEMBER PETREY: Yes.
17 CHAIR BRUCH: Corie.
18 BOARD MEMBER PIERCE: Yes.
19 CHAIR BRUCH: Franklin.
20 BOARD MEMBER QUARCOO: Yes.
21 CHAIR BRUCH: Kyla.
22 BOARD MEMBER SMITH: Yes.
23 CHAIR BRUCH: Javier. Absent.
24 And the Chair votes yes.
25 SECRETARY LEWIS: You forgot Brian.

1 CHAIR BRUCH: Sorry, I've got to go back to Brian.

2 BOARD MEMBER CALDWELL: Amy, I vote yes as well.

3 CHAIR BRUCH: We're wrapping it around.

4 Thank you, Brian.

5 BOARD MEMBER CALDWELL: Okay. I vote yes.

6 BOARD MEMBER NANDWANI: Thank you, Allison.

7 Thank you, Amy.

8 SECRETARY LEWIS: 14 yes, 0 no, 1 absent. The
9 motion carries.

10 VICE CHAIR JOHNSON: The wraparound always messes
11 up the Chair. Always.

12 CHAIR BRUCH: Well, thank you for making me feel
13 better about that. Very humbled. But anyway, probably not
14 the first little minor error I'm going to make today.

15 Anyway, go ahead, Allison.

16 VICE CHAIR JOHNSON: Thank you.

17 Great. Thanks, everyone. Nice to have that
18 cleaned up. And hopefully the NOP will be able to act on
19 that next time there's a rule up.

20 All right. So that is all of our voting for
21 today. We have one more non-sunset discussion document, and
22 I will lead you through this one.

23 DISCUSSION DOCUMENT: L-MALIC ACID RECLASSIFICATION

24

25 VICE CHAIR JOHNSON: So this is an L-malic acid

1 reclassification of synthetic L-malic acid to the National
2 List, possibly with an annotation. This material is really
3 going to test your NOSB wonkiness. I'm going to try to give
4 you an overview with just enough detail to walk you through
5 our thinking but not overwhelm you, and I definitely welcome
6 questions, because this is a little bit sticky.

7 I've also been told that my voice is breaking up.
8 It is actually breaking up, and it might also electronically
9 be breaking up. So if you can't hear me, please speak up.
10 I'm going to be looking at my note screen, so I won't see
11 your faces, but just interrupt me and say you can't hear me,
12 not just that you can't understand this weird material
13 issue.

14 Okay. So L-malic acid reclassification has been
15 on our work agenda for a number of years, and it was put on
16 hold last in 2020. And from what we gleaned in the public
17 record, it seems like there were questions about how
18 reclassification might affect other materials, and that
19 caused a bunch of confusion and led the Board to get
20 concerned and just pause. So we're hoping that we can put
21 this issue to rest, hopefully at the next meeting, if
22 possible.

23 The Board brought forward a proposal to add
24 synthetic L-malic acid to the National List at the last
25 meeting in Fall 2024, but we ultimately decided to bring it

1 back to the Subcommittee so we could do a better job of
2 showing our work and address some of the questions that came
3 up. We went through several rounds of discussion in
4 subcommittee and have brought it back as a discussion
5 document this time, just to make sure there's plenty of
6 opportunity for input and get feedback about potentially
7 recommending a commercial availability requirement.

8 The confusion about this material can be traced
9 back to the original TAP review for DL-malic acid which was
10 envisioned for inclusion on the National List in 2002, so
11 over 20 years ago.

12 And just a little organic chemistry lesson. D and
13 L in organic chemistry refer to how a molecule will move in
14 response to a magnet. Typically only the D or the L version
15 occurs naturally, and the DL version is an equal mixture of
16 D and L that results from making the material through a
17 synthetic process.

18 The reviewers of DL-malic acid assumed that L-
19 malic acid produced from fermentation of glucose was a
20 viable non-synthetic alternative to synthetic DL-malic acid,
21 so at that time they recommended against adding DL-malic
22 acid, and we ended up with our current listing. The problem
23 that we're tackling here now is that non-synthetic L-malic
24 acid was added to the National List, but the predominant
25 form of L-malic acid currently in use is actually produced

1 from a process that we now understand is synthetic. The
2 precursor to L-malic acid is fumaric acid, which can be
3 produced by fermentation of carbohydrates, or it can be
4 produced synthetically from petroleum.

5 It seems clear from the TR, and public commenters
6 agreed, that the L-malic acid produced from petroleum-
7 derived fumaric acid is in fact synthetic. It also seems
8 clear from public comments that synthetic L-malic acid is
9 the primary form that's currently in use by organic
10 processors.

11 So knowing that that's the situation we're in, we
12 have a few options. We can align the National List with
13 current practice, which means allow L-malic acid that's made
14 from non-synthetic fumaric acid. We could crack down on use
15 of synthetic L-malic acid, which technically is not allowed
16 right now, and that would likely mean taking away an
17 ingredient from organic processors that the Board just
18 determined in the last sunset review in fall 2024 is
19 essential to organic processing. Or we could continue to
20 ignore the problem and just allow this mismatch between the
21 rules and practice to remain as it has been for many years
22 now. Hopefully that's not the option we choose at this
23 juncture.

24 So the Subcommittee came up with an approach that
25 is trying to split the difference. We want to be true to

1 the original intent to avoid synthetic DL-malic acid, but
2 also minimize disruption and recognize that a number of
3 organic processors do depend on L-malic acid for their
4 products. So we're suggesting that synthetic L-malic acid
5 be added to the list, but with a commercial availability
6 annotation, so the synthetic version could only be used when
7 the non-synthetic version is not commercially available, and
8 we asked stakeholders for other approaches to aligning
9 current practice with the regulation.

10 We got a lot of great comments. Commenters raised
11 questions about ancillary ingredients and excluded methods.
12 We heard that there is one OMRI listed non-synthetic L-malic
13 acid, but that that's not likely to be adequate to supply
14 current demand. And we heard that there's a high risk that
15 scaling up non-synthetic production would likely rely on
16 genetically modified bacteria that can survive in a high-
17 acid environment. So when you're making something from
18 fermentation that's acidic, you start to get more and more
19 acid in there, and that makes it harder for the bacteria to
20 continue to go through that reaction. And so you need to
21 select for a bacteria that can survive that high acidity,
22 and it sounds like GMO technology is likely the direction
23 that researchers are going to solve that problem.

24 Some of our commenters didn't like the commercial
25 availability approach. I thought they raised really fair

1 points that this isn't like choosing an organic ingredient
2 that has a clear label versus a non-organic ingredient.
3 It's hard for processors to figure out the synthetic or non-
4 synthetic status of a material, and there was some doubt
5 about whether the extra work in making that determination
6 would actually result in meaningful benefits.

7 Two last points, and then I'll open it up to you
8 all. The Subcommittee did talk about excluded method risks.
9 There's substrates here, there's microorganisms, so there
10 are places where excluded methods may be an issue, and we
11 determined that it's still reasonable to move ahead with
12 this recommendation to add synthetic L-malic acid to the
13 list without tackling those bigger fermentation issues in
14 the context of this material.

15 You know, it's an overarching global issue that
16 the Board needs to figure out how to address at some point,
17 and if we do take that work on, the outcome of that work
18 could then be applied to this listing along with any other
19 relevant listings, but it didn't seem necessary at this
20 point to hold up this review. And it also became clear, I
21 think, from the public comments that the non-synthetic
22 version is actually probably where the excluded methods
23 issues are most likely to arrive, and so a benefit of
24 separating out and accurately listing both the synthetic and
25 the non-synthetic L-malic acid is that the issues raised by

1 each version can be more accurately described and discussed
2 in the sunset process for each listing in the future.

3 We also discussed whether the Board taking action
4 on this listing change would be precedent setting. There's
5 this concern that this is kind of the first step toward us
6 going rogue and adding any materials we want to the list
7 outside the petition process, and we take that concern very
8 seriously.

9 But we did conclude that this situation is pretty
10 unique. The current listing resulted from an incorrect
11 presumption of commercial availability more than 20 years
12 ago that left a gap in the initial material analysis. So in
13 the unlikely event that another really unusual situation
14 like this arises, we can adjust it on a case-by-case basis,
15 but I don't think this opens the door to the Board just
16 spontaneously adding a lot of materials to the list.

17 So to reiterate, the Subcommittee is suggesting
18 retaining the current listing for non-synthetic L-malic
19 acid, and adding synthetic L-malic acid to the National List
20 as well with the annotation when non-synthetic L-malic acid
21 is not commercially available. So hopefully you followed at
22 least a lot of that, and I would love to get everyone's
23 thoughts now.

24 Everyone is stunned.

25 Kyla, go ahead.

1 BOARD MEMBER SMITH: Yes, I just wanted to say
2 from the certifier perspective in regards to the commercial
3 availability part of the annotation, certifiers don't love
4 the commercial availability aspects. We have some
5 challenges there, and this would be sort of a new way in
6 which commercial availability is applied in general.

7 We're looking at commercial availability of an
8 organic product versus a non-organic product, and so we
9 don't currently do this for any other material on the
10 National List, evaluated commercial availability of a non-
11 synthetic versus a synthetic, and I believe one of the
12 commenters had said -- or a couple of different comments
13 about this in that that might be challenging for operations
14 to determine on their own because that information might be
15 proprietary. So I wanted to uplift that comment.

16 And then also if it is listed on the synthetic
17 listing, I guess without that part, and if it was just both
18 listed in both places, then we're generally not checking the
19 manufacturing process as closely in regards to evaluating
20 whether or not something is synthetic or non-synthetic, and
21 so that would be just additional steps in the review process
22 to have to work through those determinations.

23 So again, just considering all the areas in which
24 certifiers can take risk-based approaches to things, having
25 to do these extra review steps will just add additional time

1 into this. So I just wanted to highlight those areas.

2 Thanks.

3 VICE CHAIR JOHNSON: Thanks, Kyla. Yeah, really
4 helpful, and that point definitely gives me pause, so I
5 think it's something that the Subcommittee will need to
6 discuss more before we bring this back as a proposal. But
7 yeah, particularly since it seems like the fermentation-
8 excluded methods' risks are more on the non-synthetic side
9 too, there doesn't seem to be a ton of value in digging deep
10 into the process at this point for the synthetic material in
11 particular.

12 On the other hand, it gives me pause that it's a
13 product of a petroleum product, and that's an area that we'd
14 like to be steering away from in organic everywhere that we
15 can. So I mean somewhere on the scale potentially has some
16 merit there, and that's a tricky balance to strike I think.

17 I see Brian and then Amy.

18 Go ahead, Brian.

19 BOARD MEMBER CALDWELL: Well, Allison, thank you
20 for giving at least me sort of a brain meltdown discussion
21 right in the beginning of our meeting today. This is going
22 to come up in a whole bunch of fermentation-related issues
23 and some other excluded methods issues relating to like sort
24 of how far back do we look. And I think it's great to
25 really start hashing through these issues with this

1 particular reclassification, but I think, as you point out,
2 we really need an overarching fermentation discussion about
3 excluded methods and don't want to necessarily hang this one
4 up on before, you know, until that's done.

5 I'm both happy and sad that I'm going to be moving
6 off the Board and won't be involved in this discussion, but
7 it really is something that the organic community in general
8 needs to confront. We might need to change our decision
9 trees. Maybe something that is produced with genetically
10 engineered components is not -- maybe it is synthetic. So
11 things like that.

12 Anyways, I just wanted to say that I totally agree
13 that this is a huge issue, and we need to at some point in
14 the next hopefully year or two have a whole discussion of
15 fermentation and GMOs, excluded methods. Thanks.

16 VICE CHAIR JOHNSON: Yeah, really agree, Brian.
17 This is a recurring issue. It's something that stakeholders
18 really care about and something we're going to need to
19 tackle, and hopefully you'll come back at least and give
20 public comments even though you won't be on this side of the
21 screen or the table then. Thank you for bringing that up.

22 Amy, go ahead.

23 CHAIR BRUCH: Thank you, Allison. Thanks for
24 articulating this in a digestible manner. There's still a
25 lot to unpack here, and there's several issues that you

1 kind of highlighted there. But I really appreciate your
2 shepherding this process and, yeah, you beat me to the punch
3 to invite Brian to continue participating when you're off
4 the Board. I think that that's a great plug for all of us,
5 and we've seen former Board members still keep engaged, so
6 that's been awesome.

7 My question actually is for my virtual table mate,
8 Kyla. Yes. Actually, I want to give you the opportunity to
9 provide additional comment because you had an exchange with
10 a public commenter during our oral webinar, and I know I
11 tried to run a tight scope that we were just limited to
12 questions and not deliberation. But the question exchange
13 you participated in kind of mentioned whose responsibility
14 really is this for understanding excluded methods and also
15 potentially fermentation, and the commenter mentioned that
16 they do believe that the Board has a role to set kind of the
17 overall policy for this. So I just wanted to give you the
18 opportunity to engage in a little bit of more background on
19 where you're coming from, from a certifier position in that.

20 BOARD MEMBER SMITH: Thanks, Amy. Yeah, I mean I
21 will say that the -- and I think I've mentioned this before
22 -- that the ACA has an ongoing working group, the materials
23 working group, and they put out a best practice for
24 certifiers to work through sticky material things. And
25 there -- I believe, I don't have it up in front of me --

1 like is a best practice in there in regards to excluded
2 methods and fermentation.

3 And so I think certifiers in general are like on
4 the same page in regards to the how far back question, and
5 they've been using those policies to make material decisions
6 for the entire time that the NOP has been in existence. And
7 as we've talked about a lot, material review has evolved
8 with the publication of the decision trees.

9 And so, I just preface all that with there are
10 lots of materials and lots of decisions that have been
11 happening, and a lot of producers out there, manufacturers
12 that have built their products around these decisions.
13 And not to say that we can't change our mind, but it could
14 have some substantial impact to decisions that have been
15 made in good faith by certifiers, largely in agreement with
16 one another. And so all that to say, I don't know. That's
17 where I'm coming from is like how much can we walk that back
18 now? That's my concern.

19 VICE CHAIR JOHNSON: Thanks both to Amy, and the
20 answer, Kyla.

21 Any other discussion? Any thoughts on this sort
22 of like idea was to test out a formal preference for non-
23 synthetic over synthetic on this material because that was
24 clearly the rationale originally for adding the L-Malic
25 rather than DL-malic acid to the list. Any other reactions

1 on whether that's like an incredible waste of time or a
2 really valuable way to move toward non-synthetic materials?
3 Somewhere in between?

4 (No response.)

5 VICE CHAIR JOHNSON: All right. Well, we'll take
6 this back to the Subcommittee and work it up into hopefully
7 a proposal for the fall.

8 And I want to acknowledge Nate also for your
9 leadership on getting us moving on this material again,
10 looking at that work agenda and saying, hey, there's stuff
11 here that we can deal with and move on and get it done. So
12 really appreciate your leadership in getting us moving on
13 this, and I think we'll hopefully be able to get it done
14 this year.

15 So thank you all for the discussion and input, and
16 also to our public commenters for weighing in.

17 All right. So that concludes our non-sunset
18 portion of the agenda, and now we're going to move into our
19 discussion of Handling sunsets.

20 So these are materials that are set to sunset in
21 2027. We'll have our discussion here in the spring meeting,
22 and then we'll be voting on these materials in the fall.

23 I know we're going to take a break somewhere in
24 the middle of this, but I think we have time to get through
25 at least the first few.

1 So I will hand it over to Kathryn to kick us off
2 with kaolin.

3 KAOLIN

4 BOARD MEMBER DESCHENES: As Allison said, I am
5 taking kaolin, which is listed at 205.605(A)(15). The
6 primary use for kaolin is filtration of juices, and some
7 noted in the comment that it's a particularly effective
8 filtering aid in apple and grape juice processing, and it is
9 listed as non-synthetic.

10 In the public comment review, there were several
11 that noted that the TR had not been posted. I just wanted
12 to acknowledge that the TR has now been posted on the
13 Petitioned Substances webpage. It was posted a little
14 later, so I want to flag to the public that it's now there,
15 and so encourage review if your comments were ahead of it
16 being posted.

17 One comment also asked about within the
18 Subcommittee comments there was note of the Alcohol and
19 Tobacco Tax and Trade Bureau, TTB, reference. And that was
20 purely just a call out that the TTB covers juice products
21 used for wine production, and that the TTB allows the use of
22 kaolin. It's also allowed by FDA, so at no limit other than
23 good manufacturing practices.

24 A few other comments requested that NOSB consider
25 some specific usage cases in the prohibition of nano-sized

1 kaolin particles via annotation, but noting here that the
2 annotation process is separate from this sunset process. It
3 appears that the substance is being used by industry and
4 provides a critical tool in specifically juice making and
5 wine making. Kaolin was previously relisted unanimously,
6 but a limited scope TR was received, so this would not be on
7 the consent agenda -- the group voting agenda -- based on
8 that new information.

9 Any questions?

10 VICE CHAIR JOHNSON: Excellent, Kathryn. Your
11 first sunset -- the first sunset of the meeting with no one
12 going before you as a model -- and you nailed it, and even
13 the efficiency in voting piece, so thank you so much for the
14 presentation.

15 And are there any questions or comments for
16 Kathryn?

17 Amy?

18 CHAIR BRUCH: Not a question, just a comment
19 echoing Allison. Awesome job, Kathryn. Welcome to the
20 team, and nicely done debuting our first sunset for the
21 entire spring 2025. That was incredible.

22 One thing to elevate what Kathryn did say to the
23 community is that the TR, there's a process, and we have
24 adopted it informally to really prioritize when we do
25 receive a TR, the sufficiency vote, we try to elevate that

1 and prioritize that within the Subcommittee meetings so we
2 can get that available to our stakeholders as quickly as
3 possible. At least we're trying to do our part in that
4 review. So I just wanted to highlight that. I know that
5 impacts a few of the technical review documents that perhaps
6 maybe we saw them and they're just getting posted.

7 Kathryn, thanks for highlighting this one is
8 already available, but I just want to make that note.

9 BOARD MEMBER DESCHENES: Thanks, Amy.

10 VICE CHAIR JOHNSON: Questions or discussion?

11 (No response.)

12 VICE CHAIR JOHNSON: All right. I think we're set
13 on this one.

14 Thanks, Kathryn.

15 SODIUM BICARBONATE

16 VICE CHAIR JOHNSON: Moving right along to sodium
17 bicarbonate, baking soda, which was supposed to be the
18 iconic no-brainer, very simple material. And like
19 everything, it's not always what it seems.

20 Kyla, please go ahead.

21 BOARD MEMBER SMITH: Yes, thank you.

22 Sodium bicarbonate is listed at 205.605(A)(26).

23 It is commonly known as baking soda, and it is a common
24 compound in baking powder. It helps to regulate acidity for
25 things like tomato soups or in pastes and beverages. It is

1 also used as an anti-caking agent or as a stabilizer,
2 helping to maintain the appearance and consistency of foods.

3 Sodium bicarbonate is also used in pancakes,
4 biscuits, muffins, crackers, and cookies -- all the things I
5 like to eat. It is also used in self-rising flour in
6 confections, and it can also be used as a neutralizer for
7 use in butter, cream, and ice cream.

8 It was unanimously listed at the last review. And
9 the public comments received this round, most, if not all,
10 were in favor of relisting. I do, again, want to
11 acknowledge that the wrong document was in the meeting
12 packet originally and was updated afterwards, and so I did
13 see that there were some commenters that were able to
14 comment to the new document, but there were different
15 questions in there. So, actually, I was going to preface
16 this before this, but for all the sunset reviews I would
17 just couch the public comment review with the timing of
18 public comments this round.

19 We are doing our best to stay on top of public
20 comments, and so I know that all of us Board members are
21 committed to making sure that we thoroughly review all of
22 the comments if we didn't see them prior to talking about
23 the materials at the meeting, like over the summer, to make
24 sure that we're thoroughly vetting these materials.

25 So if you are not hearing your comments reflected

1 in our discussion, it could be that we just didn't get an
2 opportunity to read them yet because of the timing of the
3 comments, but we will make sure that we do our due diligence
4 over the summer. So I just wanted to preface that with all
5 of this public comment review. So again, in particular with
6 this material -- since there could have been things that
7 came in even later after since there was that swap of the
8 document -- I'll make sure to read the comments and make
9 sure that all of the -- if there were answers to the
10 additional questions that we asked.

11 But again, in general, what I saw from commenters,
12 that they were in favor of relisting this due to its
13 essentiality, and that although this material has been non-
14 controversial in the past, that -- based on this recent TR,
15 and there's new information in there regarding
16 classification that we will need to discuss -- and so I
17 don't think that this material should be eligible for the
18 group vote at the fall meeting for that reason. And this TR
19 is still awaiting publication on the Petitioned Substance
20 database, so hopefully it will be coming soon. That's all.

21 VICE CHAIR JOHNSON: Great. Thanks, Kyla.

22 Any questions or comments?

23 (No response.)

24 VICE CHAIR JOHNSON: We all love cakes, sounds
25 like. Organic cakes for all.

1 All right. Thanks for covering that material.

2 WAXES-NONSYNTHETIC (WOOD ROSIN)

3 VICE CHAIR JOHNSON: And next up, we have waxes-
4 nonsynthetic (wood rosin).

5 And there's something funny about that listing,
6 and Logan, hopefully you'll remind us what it is because I
7 can't remember if I said it right or if it was still
8 incorrect. Go ahead.

9 BOARD MEMBER PETREY: It is correct. They used to
10 -- it would be wood resin versus wood rosin, but that was
11 fixed. I remember in our subcommittee review, I did not
12 have the updated terminology there. So it has been changed
13 to wood rosin.

14 So yes, wood rosin at 205.605, substances allowed
15 as ingredients in or on processed products. So wood rosin
16 is primarily used as a fruit wax, and usually this pertains
17 to citrus. It reduces the gas exchange, respiration, and
18 weight loss from water loss, and it's just because it is a
19 permeable layer put on the fruit.

20 From commenters, they've stressed that this is not
21 always used. It's more used when considering the weather or
22 considering maybe where the fruit is going or the
23 conditions. Wood rosin is a natural extract from pine tree
24 stumps, and that's primarily from Longleaf Pine and from
25 Slash Pine. Both of those are -- I guess I can't say

1 predominant because Longleaf is now on the endangered
2 species list, but Slash is much more prominent here.

3 We are in areas of a lot of timber production for
4 pine trees, but the wood rosin production is not driving the
5 harvest of trees. It is a byproduct. So when you are
6 harvesting the timber, these stumps are left in the ground,
7 and it is quite a mess.

8 It's very expensive to clean up this ground,
9 whether it's going to be planted again or whether it's
10 turned into farmland or development or whatever the
11 conversion is going to be. That stump extraction is very
12 expensive. It takes a lot of heavy equipment. And so the
13 wood rosin is used from the stump, not from the timber
14 itself, so the economics of it is not driving the harvest of
15 timber.

16 The reason why Longleaf is not typically replanted
17 in its spot is because it is a very slow maturing pine, and
18 when people are in timber production, they're going to use
19 something that is faster.

20 Most comments were in full support of relisting
21 wood rosin, said that it is essential. It follows the OFPA
22 criteria because there are no human effects, side effects to
23 that. But, however, there were two commenters that did
24 request that there is a label that states that there are
25 synthetic waxes used, to inform the consumer that there are

1 synthetic waxes put on the fruit.

2 Also, one commenter requested an annotation
3 stating that it would not be produced using volatile
4 synthetic solvents. And there was one commenter that did
5 repeat or did say -- and they did in the previous sunset as
6 well -- that any residual solvents are removed along with
7 the water, and neither the initial extraction solvent nor
8 the refining solvents are present in the final ester of wood
9 rosin additive.

10 Again, all other commenters were strongly in
11 support of this material. And the questions to stakeholders
12 was specific to my area. I did not get an answer. I was
13 asking if -- and this actually came up because of right
14 after the hurricane that we had here it snapped a lot of
15 trees, and a lot of those were taken straight to some
16 mulching areas and discarded -- I did not get any questions.
17 And, actually, the producer of this material is in my state,
18 so I need to contact them directly to try and get an answer.
19 But there was a lot of destruction from the hurricane. I
20 was curious if any of that could be used.

21 That's all. And I'm not considering this one for
22 a group vote.

23 VICE CHAIR JOHNSON: Excellent. Thanks, Logan.

24 Any questions for Logan? Any comments?

25 (No response.)

1 AMMONIUM BICARBONATE

2 VICE CHAIR JOHNSON: All right. Next up, then, we
3 have ammonium bicarbonate and ammonium carbonate, which
4 Dilip will tackle together.

5 Go ahead, Dilip.

6 BOARD MEMBER NANDWANI: Okay. Thanks, Allison.

7 So I'll start with ammonium bicarbonate. It's a
8 205.605((b) for use as a leavening agent. And we do have
9 the technical report. The recent just came in 2025.
10 Although we had a draft of this report in fall, I think just
11 before November we got the drafts, and then we reviewed it.
12 So we have that report still, and we reviewed it.

13 Past NOSB actions recommended this sunset. It was
14 recommended, and they found no concerns regarding the
15 continued listing of ammonium bicarbonate. This material
16 still continues to satisfy all off-home material criteria,
17 and public comments confirm its current use and need. All
18 comments, oral and written, supported the re-listing of this
19 material, and there was none opposed. That was the past
20 NOSB review.

21 The Subcommittee, as I mentioned in the beginning,
22 the use is in leavening and the baking, and they are
23 basically salts. Bicarbonate and ammonium bicarbonate and
24 carbonates, they are salts composed of ammonium and
25 carbonate ions. Ammonium bicarbonate is the mono-ammonium

1 salt of carbonic acid, and ammonium carbonate I will touch
2 in a minute, that's diammonium salt of carbonic acid.

3 They are used in cookies and crackers and some
4 baking goods, and they are manufactured -- they are made
5 from ammonia and carbon dioxide. And they have
6 international acceptance in all these organic standards:
7 Canadian General Standards, EU, EEC -- European Economic
8 Community -- CODEX, also in IFAWM, and also Japan
9 Agricultural Standards.

10 The current sunset review and public comments
11 periods, oral and written, have not raised any environmental
12 and human health concerns or any other reason why this
13 material should not continue to be allowed for organic
14 handling. During the first public comment -- as I mentioned
15 earlier, that period of the current review cycle -- a
16 response to stakeholders had mentioned that this material
17 was still critical for handlers, especially for baking
18 crackers and similar baked goods.

19 Most of the comments supported its continued
20 relisting on the National List. There is one comment I saw
21 recently from a stakeholder opposed to relisting due to
22 availability of natural means.

23 And we will not add these two on the consent
24 agenda as we have still new TR. So that's all I have for
25 ammonium bicarbonate.

1 Allison, do you want me to continue ammonium
2 carbonate?

3 VICE CHAIR JOHNSON: Yeah, I think go ahead with
4 ammonium carbonate too, since they're similar, and then we
5 can discuss both together.

6 AMMONIUM CARBONATE

7 BOARD MEMBER NANDWANI: Correct. So ammonium
8 carbonate is, again, 205.605(b), and its used actually the
9 same as a leaving agent. I mentioned that we have the TR,
10 the most recent TR we received. It's actually 2025. Past
11 NOSB review for this material, also no dissent from NOSB,
12 and recommended continued listing of ammonium carbonate.
13 And this material still continues to satisfy all OFPA
14 criteria, and public comment confirmed its current use and
15 the need.

16 Use, I already mentioned, and the difference
17 between ammonium bicarbonate and carbonate -- as I mentioned
18 -- it's a diammonium salt of carbonic acid, so that's the
19 difference. This is a chemical formula. I will not go into
20 the detail in chemical formulas, but it's the diammonium
21 salt of carbonic acid.

22 Ammonium carbonates, they are manufactured by the
23 reaction of ammonia sourced from the synthetic Haber-Bosch
24 process with carbon dioxide sourced from industrial
25 processes like power generation, cement manufacturing, or

1 fossil fuel processing.

2 I mentioned about the international acceptance in
3 all of these agencies and our organic standards. Public
4 comments also, as I mentioned for ammonium bicarbonate, and
5 the original TAP, the recent TR, previous subcommittee
6 review, public comments, historical information, and current
7 review have found no environmental concerns and no human
8 health concerns raised through this original TAP review.
9 And, let's see. Again, yeah, we won't put these carbonates
10 in the consent agenda as we have a new TR and we'll go back
11 to subcommittee.

12 That's all I have, Alison. Thank you.

13 VICE CHAIR JOHNSON: Great. Thank you so much,
14 Dilip.

15 Any questions or discussion?

16 BOARD MEMBER NANDWANI: Sorry. One comment.
17 There are no organic alternatives to replace the ammonium
18 carbonates. I wanted to add that one also.

19 VICE CHAIR JOHNSON: Thank you.

20 BOARD MEMBER NANDWANI: Yes, Brian.

21 VICE CHAIR JOHNSON: Brian, go ahead.

22 BOARD MEMBER CALDWELL: Yeah, thanks, Dilip. I'm
23 wondering, it seems like these materials are very similar
24 chemically and also in use to sodium bicarbonate.

25 BOARD MEMBER NANDWANI: Yes.

1 BOARD MEMBER CALDWELL: And I'm just wondering if
2 you or anybody else on the Board knows why a baker would
3 choose one over the other. Like in our food pantry, we have
4 baking soda. We don't have any ammonium bicarbonate or
5 ammonium carbonate. Do you know what the difference is and
6 how they perform or what they're used for?

7 BOARD MEMBER NANDWANI: That's a good question. I
8 think primarily they are used in baking goods. And what I
9 understand is that some baking goods, based on their types,
10 it's the manufacturer or the vendor's choice that they use
11 ammonium carbonate or ammonium bicarbonate. But I don't
12 have a very good answer, particularly from the
13 manufacturer's or the vendor's perspective. I'm not sure if
14 anyone else has any idea about the uses of these carbonates
15 from the Board members.

16 VICE CHAIR JOHNSON: I think there were a few
17 comparisons in the TR. Some taste difference between,
18 relative to baking soda, that it has less residual flavor.
19 It can't be used in moist baked goods, so that's where
20 baking soda would be used, but in drier applications it has
21 some texture benefits it sounds like.

22 BOARD MEMBER NANDWANI: Correct. Yeah, that's the
23 point I read in the TR as well, for the moist baking
24 products, yeah, that's true.

25 Thanks, Allison.

1 Hope it answered your question, Brian.

2 BOARD MEMBER CALDWELL: Yeah, thanks. They had
3 said there's sort of no -- I guess they said no organic
4 alternative, but I was just wondering if there might be
5 multiple materials that could be used the same way. But it
6 sounds like there's subtle differences. So yeah, thanks.

7 VICE CHAIR JOHNSON: Yeah, sounds like preferable
8 in some applications where it's an option to use them.

9 All right. Any other questions or comments?

10 (No response.)

11 VICE CHAIR JOHNSON: All right. Thank you, Dilip.

12 CALCIUM PHOSPHATES (MONOBASIC, DIBASIC, AND TRIBASIC)

13 VICE CHAIR JOHNSON: Next up we have calcium
14 phosphates (monobasic, tribasic, and tribasic) with Andrea.

15 Go ahead.

16 BOARD MEMBER HATZIYINNIS: Hi, everyone. Thank
17 you.

18 Calcium phosphates are listed in 205.605(b)(9).
19 There have been on the list and -- excuse me while I pull up
20 my document -- the comments were noted that phosphates as a
21 general ingredient should eventually be phased out, but
22 there is no organic replacement for phosphates, and this was
23 unanimously relisted last time. It has been on the list
24 since its inception, and there was a TR in 2016, generally,
25 on the phosphates.

1 Calcium phosphates are used as a raising leavening
2 agent and a critical component in baking. They're an
3 aluminum-free option. All three of the calcium phosphates
4 are used as leavening agents, dough conditioners, yeast
5 food, or expanding agents.

6 The monobasic and dibasic are found in pancake
7 mixes and other baking mixes, but also commonly used in
8 cookies, crackers, potato chips, and as a form of canned
9 fruits and vegetables. Dibasic is used in enriched flours
10 and noodle products and dried cereals. Additionally, it's
11 used as a food source for yeast and bread making and an
12 anti-caking agent in dry products like spices and
13 thickeners.

14 It's manufactured. The calcium and phosphorus are
15 sourced from limestone and phosphate rock. The food-grade
16 phosphates are formed by reacting purified phosphate with
17 sodium, potassium, or calcium hydroxides.

18 This ingredient is found in reciprocal programs.
19 Many of them limit the use to the monocalcium for feed as
20 well as self-rising flour. Wanted to make sure I had the
21 animal feed notation in there as well.

22 So in our stakeholders, we had comments. They
23 came in both ways. That supported delisting, was surrounded
24 to the comment of phosphates in general and not specific to
25 this material. There were some comments to limit the use to

1 monocalcium only, citing the reciprocal programs, and that
2 this is the best use for it in baking, as a leavening agent,
3 and that the other parts are not as relevant.

4 But we did have some positive comments in support
5 of relisting for all three types. And so there was some
6 split discussion, and some more discussion is probably
7 warranted.

8 VICE CHAIR JOHNSON: Great. Congrats on your
9 first sunset presentation, Andrea. Well done.

10 Any questions or comments?

11 Amy, go ahead.

12 CHAIR BRUCH: Yeah, Andrea. Excellent job. I
13 really appreciate you diving in here. Just have a general
14 question, and it's fine if we don't know the answer to this
15 yet. But you mentioned in the question to the stakeholders
16 about potentially a tighter annotation and maybe on to just
17 the mono piece, accepting the mono like some of our
18 international fluency partners do.

19 What would be the impact to industry if the other
20 two forms would not be available? Do you have an idea, or
21 does anybody have an idea, or maybe something to dive into?

22 I apologize, Andrea. Welcome to the Board.

23 BOARD MEMBER HATZIYINNIS: That's okay. I'm
24 checking my notes.

25 CHAIR BRUCH: I'm just kidding. This all just

1 plays out in such a transparent way, doesn't it?

2 BOARD MEMBER HATZIYINNIS: It does.

3 The monocalcium phosphate is the main one that's
4 used as a baking and leavening agent. And I think you are
5 right, we should confirm there wouldn't be any other
6 impacts. I do note here that the dicalcium is used commonly
7 in feed, and we may need some more input from the farm
8 community if this would impact the feed. Most of the
9 comments are about use for formulated products.

10 I see Kathryn has her hand up.

11 BOARD MEMBER DESCHENES: I was just going to
12 comment that I know, within some handling operations that
13 I've been involved with, we certainly use the tricalcium
14 phosphate, but often for like nutrient vitamin and mineral
15 sort of uses. So it could be covered under other usages
16 within the list already.

17 CHAIR BRUCH: All right. Thank you, Andrea and
18 Kathryn for that. Appreciate that.

19 VICE CHAIR JOHNSON: Andrea, just to reiterate,
20 you said that it sounded like this could be a candidate for
21 a group vote, but there is some discussion, there's some
22 disagreement in public comments. This is when we would
23 potentially put it on a group vote list for the fall, or not
24 so much.

25 BOARD MEMBER HATZIYINNIS: I think we should

1 warrant some more discussion. The last time this was up for
2 discussion, the Board stated that this would be classified
3 under phosphate-containing ingredients, and they wanted to
4 phase those out. But because there was no organic
5 alternative, this would maintain its status.

6 VICE CHAIR JOHNSON: Okay. So maybe warrant some
7 individual discussion. Perfect. Thank you. Nicely done.

8 And all these leavening agents are getting me
9 ready for lunch. We are going to get through these last few
10 605 materials, and then we'll take a break and come back for
11 606.

12 LOW-ACYL GELLAN GUM

13 VICE CHAIR JOHNSON: So next up we have low-acyl
14 gellan gum, Kyla.

15 BOARD MEMBER SMITH: Yep. So low-acyl gellan gum
16 is listed at 205.605 -- I think that's (a), right? Are we
17 still on (a)?

18 VICE CHAIR JOHNSON: It's (b). No, I think we're
19 on (b).

20 BOARD MEMBER SMITH: Okay, sorry. My notes said
21 (a). I put the wrong thing. (b)(18). Sorry. Slide was
22 right.

23 Okay. It is used as a stabilizer and thickener
24 and a gelling agent in gelatins, fillings, jams, jellies,
25 dairy and alternative milk drinks, kefir, yogurt, sour

1 cream, dressings, and various other products.

2 This is the first sunset review for this material.
3 It was added to the National List in 2020 with a vote of 14
4 yes and one abstention. So while it was unanimously listed
5 on its addition to the National List, I'm just recognizing
6 that this is its first actual sunset review.

7 In regards to the public comment received this
8 round, there were a few commenters that support relisting
9 due to essentiality, one of which stated, quote, the unique
10 properties of low-acyl gellan gum, such as its ability to
11 create gels without requiring high sugar content or high
12 ionic concentrations, are unmatched by other approved
13 substances.

14 There were also a few certifiers that submitted
15 comments indicating that they don't have any operations that
16 are using this material. We'll couch that, again, this is a
17 newer material relative to others on the list and that very
18 few certifiers actually submit comments to report the number
19 of operations using a given material.

20 There were also a couple commenters that did not
21 support relisting, questioning the material's essentiality.
22 Since there are several gums on the National List, one
23 commenter stated that, for gums in general, that there may
24 be uses that are essential and that those uses should be
25 specified in an annotation. Another commenter stated that

1 manufacturers are dictating the use of this material due to
2 their equipment's functionality rather than making the
3 equipment to support the manufacturing of a product using a
4 different type of gum.

5 We had a couple of questions put out to
6 stakeholders, one of which was asking specifically for the
7 types of products that low-acyl gellan gum is used for
8 because there is also a listing for high-acyl gellan gum.
9 And one commenter stated that, quote, organic food
10 manufacturers rely on low-acyl gellan gum to achieve
11 desirable product consistency and stability, particularly in
12 dairy alternatives, plant-based beverages, and organic
13 fruit-based products.

14 We also had asked a comment regarding ancillaries
15 and if there were any additional ancillaries to note, and I
16 didn't see any comments specifying any particular
17 ancillaries. And then this is just more of a procedural
18 comment for us for consideration, but we did review all of
19 the other gums last year, and so if this material is
20 relisted, I do think it would be beneficial to group low-
21 acyl gellan gum with the other gums during the next sunset
22 review so this gum would get reviewed a little bit early.

23 In regards to the fall sunset group vote
24 recommendation, while this material was unanimously listed
25 on its original listing, as I said, and there wasn't any new

1 information presented, I am not recommending this material
2 as eligible for the group vote, again, since it is its first
3 sunset review.

4 VICE CHAIR JOHNSON: Excellent. Thanks, Kyla.

5 Any questions or discussion on this material?

6 (No response.)

7 VICE CHAIR JOHNSON: Okay. Thank you.

8 OZONE

9 VICE CHAIR JOHNSON: Next up, our last new
10 member's first sunset review, ozone.

11 Please go ahead, Amanda.

12 BOARD MEMBER FELDER: All right. So ozone is
13 listed on 205.605(b)(21). It's used as a powerful oxidant.
14 It has lots of different uses, mainly for sanitizers. It's
15 also used to wash produce, treat water. It can improve
16 water quality when used as a broad scope disinfectant. It's
17 also applied directly to food as an antimicrobial treatment,
18 so it's also consequently a preservative.

19 This was relisted unanimously at its last sunset
20 review. There was a recent TR that was just posted that was
21 limited to just the handling scope of ozone use.

22 Public comment was pretty consistent. No real big
23 pushback for this to be delisted. Its essentiality was
24 really highlighted as agreement for fruit in the wash water,
25 you need, a huge food safety need, especially with FSMA.

1 It was also noted for sanitizers. It's used a lot
2 on wine barrels. The porous nature of wine barrels is
3 really hard to sanitize, so ozone is really key for that
4 process.

5 The main comments against relisting was mainly
6 around worker welfare of exposure, but commenters also noted
7 that this is something that's highly monitored when it is
8 used in gas form. It's in storage rooms that are checked by
9 EPA regularly. They're checked by various food safety and
10 other third-party audits and verifications, so it's not
11 something that's just used haphazardly. It is monitored.

12 There was a commenter -- I don't want to disregard when
13 people ask for things -- that there was an annotation asked
14 for us to note that it not be applied to soil because
15 there's a broad effectiveness against soil organisms, but
16 I'd like to personally ask for more expansion on how that
17 applies on a handling aspect since we're looking under
18 handling usage for ozone.

19 We didn't really have any questions for
20 stakeholders regarding this because we just got a new TR. I
21 don't think it'd be eligible for voting efficiency.

22 And that's it. Any questions?

23 VICE CHAIR JOHNSON: Excellent, Amanda. Very well
24 done. Thank you.

25 Any questions or comments for Amanda?

1 Amy?

2 CHAIR BRUCH: Just to say congratulations, Amanda.
3 Nicely done on your sunset debut.

4 I wanted to just note from public comments, there
5 was a statement about the Board would benefit from a
6 comprehensive review of sanitizers, disinfectants, and
7 cleaners. That's something, you know, we've heard not just
8 for this substance, but we do review quite a few substances
9 that are falling in that category, so could be a future work
10 agenda item for anybody interested in shepherding that. So
11 I just want to make a note of that, that we did hear that
12 for public comments a few times.

13 So thank you, Amanda. I really appreciate your
14 work here.

15 VICE CHAIR JOHNSON: Thanks, Amy.

16 Any other comments or questions on ozone?

17 (No response.)

18 SODIUM HYDROXIDE

19 VICE CHAIR JOHNSON: All right. We're going to
20 stick with Amanda for sodium hydroxide, and then we'll take
21 a break.

22 BOARD MEMBER FELDER: All right. So sodium
23 hydroxide is also listed on 205.605(b)under(32). There is
24 an annotation to prohibit for use in live peeling of fruits
25 and vegetables. Sodium hydroxide is a highly caustic

1 substance used as a processing aid in cocoa manufacturing,
2 as a caustic bath for pretzels that makes the pretzel
3 surface smooth, and it helps develop the brown color during
4 baking, and it also removes the bitterness from all oils.

5 It's used as an alkali to peel fruits and
6 vegetables, but that is specifically prohibited under this
7 annotation. It's also used to manufacture soaps, oral care
8 products, and detergents, and it can be used as a food
9 preservative to prevent the growth of mold and bacteria.

10 This material was also unanimously relisted at its last
11 sunset review. The last TR was in 2020, so no new TR
12 information there.

13 Public comment mostly highlighted its uses. It's
14 used in olive oil processing and manufacturing. Most people
15 asked since there's a -- it just has a how not to use it,
16 where there were some asks for specific annotations of how
17 it can be used because it can be used so broadly. Having an
18 annotation like that would be a very long annotation, I
19 think, of the multiple ways that it can be used because it's
20 not so limited. And yeah, not a lot of people saying --
21 nobody said to delist it, just more of an ask of specific
22 allowances.

23 Any questions?

24 VICE CHAIR JOHNSON: Great. Thank you. So I
25 think I heard it was previously unanimous and there's no new

1 information, so you think this would be a candidate for a
2 group vote?

3 BOARD MEMBER FELDER: I do. I don't think there's
4 anything new. I don't think this is one of those ones that
5 we're all really -- I can't think of the word right now --
6 we're not in agreement as an industry. But yeah, I don't
7 think there's anything new. I think it'd be a good
8 eligible, and if some new information comes out, then we
9 pull it off the voting efficiency roster in the fall -- just
10 to emphasize that.

11 VICE CHAIR JOHNSON: Excellent, thank you. All
12 right. Well, organic pretzels, cookies, cakes, crackers, I
13 think, are on the menu for our lunch break.

14 Go ahead, Nate.

15 SECRETARY LEWIS: Yeah, I'll just note that we
16 have a group of one right now on our group voting roster.
17 So lots of discussion to have on all these substances, and I
18 appreciate everyone giving it a whirl.

19 CHAIR BRUCH: Excellent. Thanks for the update on
20 that. I'm glad you're tracking that, Nate.

21 And as Allison mentioned, let's move to a break.
22 Really appreciate getting to this point in our schedule.
23 And I'd like to return back at 10 past the hour. Gives us
24 just a little extra time to hopefully sneak in a lunch for
25 those that might not have eaten. And then we'll continue

1 back on with Handling. Thank you.

2 (Off record from 1:48 p.m. to 2:20 p.m.)

3 CHAIR BRUCH: All right. Good afternoon. Welcome
4 back, everybody. Before we continue on with Handling, a
5 quick icebreaker. And since most of you probably grabbed a
6 quick snack, I thought maybe this one was appropriate. I'm
7 going to ask a couple members of our team what their
8 favorite organic snack is.

9 Nate Lewis, go ahead. Start us off.

10 SECRETARY LEWIS: Yeah, well, I just got
11 introduced to a new vegetable, which is something that
12 doesn't happen very often in people's lives. I feel like we
13 all kind of know what the vegetables are. But a friend of
14 ours is growing yacon, which is a tuber, and we eat it all
15 day long. It's like our new favorite household snack. So
16 yacon is my favorite organic snack right now.

17 BOARD MEMBER PETREY: Nate, can you spell that?

18 SECRETARY LEWIS: I think it's J-A-C-O-N.

19 BOARD MEMBER PETREY: Okay.

20 CHAIR BRUCH: Excellent. Very informative. Thank
21 you, Nate. And healthy.

22 Okay. Andrea, I'm going to go to you next, our
23 retailer.

24 BOARD MEMBER HATZIYINNIS: I have discovered these
25 great organic smoothies, and I don't know if you can see it

1 with my blurred background. Noka. They're shelf stable.
2 And I enjoy eating pouches, even though I'm an adult,
3 because I can get my fruit and vegetables on the go at any
4 time I want. So thank you for making an adult pouch format
5 that's organic.

6 CHAIR BRUCH: Excellent. That sounds good. I'm
7 going to have to look for those. And I just recently was
8 trying one of my one-year-old snacks, these puffs, and in a
9 small print it said for babies and beyond. So I'm making
10 sure to be beyond there.

11 Franklin, are you back?

12 BOARD MEMBER QUARCOO: Yes.

13 CHAIR BRUCH: Okay. I'm curious. What's your
14 favorite organic snack?

15 BOARD MEMBER QUARCOO: Peanuts.

16 CHAIR BRUCH: Excellent. And very fitting,
17 because we learned a little bit about that yesterday.

18 BOARD MEMBER QUARCOO: We did.

19 CHAIR BRUCH: So, thank you.

20 Cat, I'm going to go to you next.

21 BOARD MEMBER MCCLUSKEY: It's conditional. It
22 depends on what's in the garden. Right now my favorite
23 organic snack are the spiciest radishes that I can find.

24 CHAIR BRUCH: Love it. That sounds good. I know
25 rotation is always nice, especially this time of year.

1 And Carolyn, I know I'm just going to keep going
2 to you for all of these, actually --

3 BOARD MEMBER DIMITRI: Okay. I feel so special.

4 CHAIR BRUCH: -- because what I heard from the
5 first one is you want all of these icebreaker questions.
6 So go ahead, Carolyn.

7 BOARD MEMBER DIMITRI: I'm a big fan of organic
8 jelly beans.

9 CHAIR BRUCH: Really? Well, that's good.

10 BOARD MEMBER DIMITRI: I know, but everyone is
11 talking about these healthy snacks. I pull out a totally
12 decadent sugar thing. Way too many grams of sugar per
13 serving.

14 CHAIR BRUCH: That's okay. Thanks for balancing
15 out the spectrum here, Carolyn. Really appreciate that. My
16 sons would probably echo your comments there, too. Along
17 with vegetables, though. They like vegetables.

18 Okay. Allison, without further ado, we'll
19 continue on with your subcommittee.

20 VICE CHAIR JOHNSON: All right. Thank you, Amy.

21 So we're turning our attention now to 5.606, which
22 is our non-organic agricultural ingredients allowed in that
23 5 percent of organic products.

24 CARNAUBA WAX

25 VICE CHAIR JOHNSON: So the first one up is

1 carnauba wax with Logan.

2 BOARD MEMBER PETREY: Thank you.

3 All right. So carnauba wax, unit 205.606(a).
4 It's used as a component in fresh fruit coatings, like candy
5 coatings and maybe the jelly beans. I'm not sure. But also
6 as a component of edible coatings for nuts. Other uses
7 include a base for chewing gum. It's also used in soft
8 drinks. It is part of the formulation for fruit coating --
9 like with the wood rosin -- and its function there is to,
10 again, reduce the gas exchange, to reduce the weight loss
11 and to reduce microbial degradation.

12 The production of the carnauba wax begins when the
13 leaves are cut from the palm tree, in Brazil's driest
14 season. They're dried in the sun and then beat or scraped
15 until the wax falls off as a fine powder. The wax is
16 collected and then melted by steam or solvent. The wax is
17 then cooled and filtered via a filter press or through a
18 filter cloth, and then further cooled and dried. The wax
19 may also be clarified by centrifugation or with hydrogen
20 peroxide.

21 The international acceptance is approved in
22 Canada. It is in CODEX. Also, in Japan it is permitted.

23 Ancillary substances, according to the TR, the raw
24 carnauba is sold to formulators without any additional
25 ingredients, but it is a component of food waxes.

1 For human health and environmental issues, it is
2 not considered to have any human health concern. And
3 because the leaves harvested will regrow, and also the leaf
4 remnants remaining are used in those cultures for making
5 brooms and hats, there are no environmental concerns
6 reported.

7 In previous years, other Boards have discussed
8 that there is an organic availability. There was a
9 commenter that -- and we did have, on the question for the
10 sunset, an update for the organic availability -- one
11 commenter mentioned that while there are some organic forms
12 available, it's made clear during previous reviews that
13 forms do not provide the same functionality as a synthetic
14 form currently allowed on the National List. It also
15 mentioned that he would urge the members to ask under
16 certain conditions that the organic forms could be used. So
17 I will add more detail into the question for the fall.

18 And all other commenters supported the relisting.
19 Again, two commenters had similar concerns or multi-labeling
20 on the products similar to the wood rosin.

21 And that is all.

22 VICE CHAIR JOHNSON: Great. Thanks, Logan.

23 And just as a reminder, so when we're in 606 land,
24 these are ingredients that are allowed but only when the
25 ingredient is not commercially available in organic form.

1 And the hope is that, over time, the market will notice
2 these materials and start to make them available
3 organically.

4 Occasionally, there's some unique barrier to
5 producing it organically. So those are things that are
6 helpful to flag. It sounds like here the functionality for
7 some reason is not equivalent. But those are things to keep
8 an eye out for when we're reviewing these 606 materials.

9 Any questions or comments for Logan?

10 (Zoom dropped across America.)

11 (Off the record from 2:17 p.m. to 2:27 p.m.)

12 CHAIR BRUCH: Well, perfect. I think we're ready
13 to resume. Thank you for recovering, everybody, from that
14 technical glitch.

15 And, Allison, I will pass it back to you.

16 VICE CHAIR JOHNSON: All right. Thanks, Amy. You
17 never know what's going to happen in Handling. Thanks for
18 rolling with this.

19 We were just wrapping up discussion of carnauba
20 wax Logan had presented, and we were looking for any more
21 questions or comments on this one.

22 (No response.)

23 VICE CHAIR JOHNSON: And I know we talked about
24 how to deal with a group vote in 606. I think, for the
25 record, let's say whether the last vote was unanimous, and

1 whether we had any new information. I think there will
2 almost always be some amount of new information about
3 commercial availability, but let's kind of talk through that
4 for the record so that we can decided what to do with it
5 come fall.

6 Logan, I think you said this was unanimous
7 previously, and we got a little information about sort of
8 use, but not a lot.

9 BOARD MEMBER PETREY: Not a lot, no. It was more
10 just a suggestion in the question or how I questioned, but
11 not any information or updates.

12 VICE CHAIR JOHNSON: Okay. So plausibly, it could
13 be a candidate for a group vote unless we got some more
14 information in the next round of comments. Okay. Great.
15 Thank you, Logan.

16 COLORS

17 (BEET JUICE EXTRACT, BETA-CAROTENE EXTRACT,
18 BLACK/PURPLE CARROT JUICE, CHOKEBERRY ARONIA JUICE,
19 ELDERBERRY JUICE, GRAPE SKIN EXTRACT,
20 PURPLE SWEET POTATO JUICE,
21 RED CABBAGE EXTRACT COLOR,
22 RED RADISH EXTRACT COLOR, SAFFRON EXTRACT COLOR)

23 Okay. I'm next up with the colors, of which there
24 are many, so I'm going to do a long read of what's covered
25 here. So this is 205.606(d): colors derived from

1 agricultural products must not be produced using synthetic
2 solvents in carrier systems or any artificial preservative.
3 And we have a list of 10 that are still allowed here.

4 So, beets, extract color, derived from Beta
5 vulgaris L., except must not be produced from sugar beets.
6 Beta-carotene extract color, derived from carrots, (Daucus
7 carota L.) -- this is going to test my Latin, guys -- or
8 algae (Dunaliella salina).

9 Black/purple carrot juice color, derived from
10 Daucus carota L. Chokeberry, aronia juice color derived,
11 from Aronia arbutifolia (L. Pers. or Aronia melanocarpa
12 (Michx.) Elliot. Elderberry juice color, derived from
13 Sambucus nigra L. Grape skin extract color derived from
14 Vitis vinifera L. Purple sweet potato juice, derived from
15 Ipomoea batatas L. or Solanum tuberosum L.

16 Red cabbage extract, color derived from Brassica
17 oleracea L. Red radish extract color derived from Raphanus
18 sativas L. And saffron extract, color derived from Crocus
19 sativas L.

20 So colors generally, I'm going to sort of talk
21 about colors generally and then we'll get into a few
22 specifics. Colors are added to food products to make them
23 look nice, to meet consumer expectation, to protect light-
24 susceptible vitamins, and to preserve flavor. The names of
25 many of these colors sound like common foods, but production

1 for color use typically does require specific varieties and
2 growing techniques, so it's not necessarily that you can
3 just take produce and turn it into a color.

4 Colors are allowed under international organic
5 standards, but to varying degrees. And for the last two
6 sunset cycles, colors have been scrutinized very carefully
7 for commercial availability. In fall 2020, the Board voted
8 to sunset eight of the colors that had been listed because
9 they had become available in organic form, and the votes to
10 retain the rest of the materials were mixed.

11 The Subcommittee posed several questions to
12 stakeholders aimed at determining whether additional colors
13 are ready for sunset. So we asked, which of these colors
14 are now commercially available in organic form? Where
15 there's mixed information about commercial availability,
16 should those colors be removed from the National List to
17 ensure adequate market pressure to complete that transition
18 to organic? How essential are the colors that remain on the
19 list and are there potential substitutes? And are there
20 other specific barriers to organic transition for individual
21 colors?

22 We received several public comments on these
23 materials. Several commenters noted that most or all colors
24 should sunset, and there were several different reasons
25 given. Most of these crops are available organically now.

1 We should be striving to get ingredients produced with
2 synthetic pesticides out of organic, and we may need
3 stronger market incentives to spur production of organic
4 versions of these colors, whether that's from new crops or
5 as a market for second-quality produce.

6 We also received comments in support of relisting
7 all the colors because colors are important for consumer
8 acceptance, and the need for a particular form of a color
9 may impact whether the supply is adequate. Commenters also
10 noted that the supply may be adequate at the next sunset
11 review.

12 For a few comments on specific colors, beta-
13 carotene had particularly strong support for relisting at
14 the last sunset, so that was noted in comments again. Grape
15 skin, extract color may have complications in being
16 certified because of sulfite use in winemaking. That may
17 limit the supply that could qualify for an organic label
18 where the use of sulfites wouldn't be allowed.

19 Purple potato juice is just not available in
20 commercial quantities as organic. And it was also noted
21 that all of the color origin crops appear in the organic
22 integrity database, so there's at least some precedent for
23 growth of these crops, but it's not clear whether the
24 varieties or style of production is appropriate for color
25 production.

1 And then a certifier noted that they have members
2 who use all but the chokeberry aronia juice color and the
3 saffron extract color. One other certifier said no colors
4 are being used by their clients.

5 And, as Kyla said, there is a little lag in
6 getting to some of the comments that were submitted, so I'll
7 make sure to go back over them and see if there's anything
8 that I missed in that review, but that's what I was able to
9 pull out for today.

10 So questions, comments, discussion about colors?
11 Amy?

12 CHAIR BRUCH: Yeah, Allison, we couldn't hear you
13 exactly. You got to a point about I believe it was the
14 aronia or chokeberry. Could you just repeat that? Because
15 I do have a comment on that one.

16 VICE CHAIR JOHNSON: Was it at the end?

17 CHAIR BRUCH: Yeah, it was towards the end.

18 VICE CHAIR JOHNSON: That a certifier noted they
19 have members who use all the colors that are currently
20 listed except for chokeberry aronia juice color and saffron
21 extract color.

22 CHAIR BRUCH: Okay. Excellent. Thank you. This
23 is one that is really interesting to me. Quite a few years
24 ago -- maybe a short 10 -- this, the aronia berry, was
25 really introduced into the Midwest, and there's an

1 incredible amount of organic producers that have organic
2 berries but the limitation for them was a market. And I'm
3 just saying, you know, it doesn't sound like the Midwest is
4 suitable to do some of these things. However, this one is
5 very suitable for the Midwest, and it's a superfood,
6 incredible amount of antioxidant power. So I would love to
7 try to build that out.

8 I actually transitioned into a farm -- I think it
9 was in 2017 -- that had established aronia berries, and so I
10 spent many hours trying to find a home for these and got
11 networked to a lot of producers. So very interesting to me.

12 One thing to highlight through public comment just
13 in general is the last time colors were reviewed, you know,
14 the Board did delist some of them. So I think it's
15 definitely a good routine, the sunset process, to
16 continuously look at things, and especially in the
17 commercially available category or, you know, just future
18 innovation for our stakeholders to kind of dive into this
19 for organic options, organic markets for producers, too. So
20 thank you.

21 VICE CHAIR JOHNSON: Yeah, thanks, Amy. And the
22 comments that stood out kind of in juxtaposition to me were,
23 wow, there's all of these crops are being grown, and then
24 comments about the sort of specificity in need for certain
25 varieties and the production method. So it'd be helpful, if

1 you know any aronia berry producers still, to get a sense of
2 whether they're of the type that could be used for coloring,
3 or to get a sense from someone who purchases raw ingredients
4 to produce colors, whether they could use them because that,
5 for me, sort of like heard both perspectives and comments,
6 and I don't have the more information to kind of reconcile
7 those two perspectives. That's good to know. Could be a
8 new Midwest stable crop.

9 CHAIR BRUCH: Absolutely. Thank you, Allison.

10 VICE CHAIR JOHNSON: Thanks.

11 Nate, are you going to tell me I didn't talk about
12 group voting this list?

13 SECRETARY LEWIS: Yes, I was. I knew we were
14 going to get there. But I was also -- the aronia berry
15 conversation, a similar thing happened in Washington. A lot
16 of acreage went into aronia berries, and then there's
17 actually a lot of aronia berries sitting in cold storage,
18 frozen, because there's just the market -- you know, it was
19 one of those crops that had a lot of excitement, but the
20 market didn't really come through. So I was just going to
21 make that comment.

22 But yeah, I'm just sort of exploring the group
23 vote concept here, and it seems like colors in particular
24 are worth discussing individually, especially as they seem
25 to -- you know, the last time around we pulled a bunch off.

1 So yeah, I'm again just sort of curious what your thoughts
2 are there, but it seems like let's deal with them one at a
3 time so we can really vet whether there is a market -- or
4 sorry, whether there is an availability or not for these
5 particular items. So I'm just curious your thoughts there.

6 VICE CHAIR JOHNSON: Yeah, thank you. I realized
7 I kind of skimmed over it, but I think the votes were not
8 unanimous last time, so colors wouldn't be eligible for the
9 group vote. It was the documents from the last sunset were
10 a little bit confusing, but I think we didn't have
11 unanimity, so it wouldn't even be on the table.

12 But also to your point, there is real potential to
13 pull some of these off the list, so I think they do each
14 warrant their own discussion, or individually together or
15 sort of grouping them. But yeah, we really do want to
16 scrutinize each one.

17 Kathryn , go ahead.

18 BOARD MEMBER DESCHENES: I was just -- we have a
19 moment right here in FDA movement on colors. I don't know
20 what impact that will have to the market of these more
21 natural color extracts. Maybe a good moment to get into
22 that business. But just commenting, I think if industry has
23 thoughts about where that movement might go, it would be
24 interesting to hear more, especially as we lead into the
25 fall.

1 VICE CHAIR JOHNSON: Yeah, it's a really good
2 point, Kathryn. Happened to come up in dinner conversation
3 for me yesterday, and the consumer acceptance and what food
4 should look like is a pretty big deal. My understanding is
5 there have been efforts to pull colors out of foods, and
6 then kids stopped eating them because they didn't look
7 right, so they put the colors back in.

8 So there is this kind of push-pull of how much do
9 you need, what should something look like, particularly
10 organic versus conventional. Does it need to be identical,
11 or can it just be appealing in some way? So that's all
12 stuff for us to kind of figure out. But agreed, hopefully
13 there's an opportunity on the horizon for organic color
14 producers to grow their markets.

15 BOARD MEMBER DESCHENES: The other point I think
16 that I have not fully understood is, is it hard to make?
17 Like I don't know how much of these organic -- like how much
18 organic produce would have to go into making these extracts.
19 Is it a difficulty where someone doesn't have enough, or
20 they just need to maybe separate it out? What's the drive
21 against, you know, why don't we have more of these organic
22 colors available? So I guess that's also a question for the
23 people who produce color products.

24 VICE CHAIR JOHNSON: Yeah, and also from what I
25 understand on the buyer's side, so sometimes often the

1 conversation about commercial availability is, is there
2 enough? But it could also be, can you get the appropriate
3 quantity for your operation? So maybe you have to buy too
4 much of a color for it to be viable for a very small
5 operation, things like that. So finding that match of
6 quantity and need is really important to this conversation.

7 I think Carolyn, and then Amanda.

8 BOARD MEMBER DESCHENES: Great. Thanks so much,
9 Allison. I'm wondering, do you know anything about the
10 supply chain for these products? Because if there's no
11 well-developed spot market, then it doesn't matter how many
12 things Amy or any other farmer grows if they are just --
13 like if the buyers are always doing this under contract.
14 And so have we -- do we know who makes these colors and the
15 organic ones? And have we heard from any of them in the
16 public comment? Or maybe someone on the Board knows the
17 answer to this too.

18 VICE CHAIR JOHNSON: We do not. We heard from a
19 trade group, but I don't think we got comments from
20 individual color producers. I'll have to double check that
21 that's correct. But if anyone else has information about
22 that, it's a really good point. Like how do you get into
23 this market? Is it locked in far in advance, or is there
24 room to absorb some like seconds quality or those aronia
25 berries that are sitting in cold storage, things like that?

1 Not clear.

2 Amanda, go ahead.

3 BOARD MEMBER FELDER: Yeah, so we have a certified
4 organic kitchen that will use natural colors for cupcakes
5 for birthday parties. While that might not be considered
6 essential for a child, it kind of is, and so they'll go find
7 conventional cupcakes and not use organic, right?

8 And so it's a small kitchen. It's like you would
9 go to a local cafe type thing. It's not a big business. So
10 it's really hard to find small quantities of organic food
11 dye. Like when I'm cooking at home, it's I can't find
12 organic food dye. I use natural food dye because I only
13 need a teeny tiny bottle. And when we're purchasing,
14 they're coming in gallons of sizes.

15 So I did quick search for like, you know, the
16 gummies, the jelly beans, the things that I normally would
17 want fun colors, and those are all using organic juices and
18 colorings, which is fantastic. But they're also doing it in
19 massive batches. And so kind of like what Allison said is I
20 think those small producers kind of get stuck if we take
21 this out. But then it's that catch 22 of commercial
22 availability that we all hate. They're not being
23 manufactured because there is no demand, because natural is
24 allowed, they're being manufactured at -- it's cheaper and
25 it's less shelf space at the grocery store.

1 So do we push that as an industry and make that?
2 But then there's the consequence that small handlers then
3 get left out and they can't manufacture things. So those
4 organic bakeries and things that are trying to do good and
5 be certified can't manufacture what they need to.

6 VICE CHAIR JOHNSON: Yeah. Thanks, Amanda.
7 Really good points, and all the things that we're wrestling
8 with on these ones.

9 Andrea, go ahead.

10 You're muted.

11 BOARD MEMBER HATZIYINNIS: I remember to raise my
12 hand, but not take myself off mute.

13 I wanted to further the comments that Kathryn
14 made about the availability with organic materials --
15 because this is something I've heard as well -- that
16 although this technology for fruit and vegetable colorings
17 is widely available, the materials to produce an organic,
18 because they're agricultural, tend to use them for other
19 purposes before they would prefer them for the colors. So
20 maybe something we want to hear from. I do know some people
21 who work in this industry and can reach out for further
22 comment.

23 VICE CHAIR JOHNSON: Okay. Yeah, that'd be
24 fantastic, Andrea. I know Jerry covered colors when they
25 were last up for sunset and did quite a bit of digging and

1 outreach to industry to identify colors that had become
2 available and those that had not, so any new information we
3 can pull in for the fall would be helpful.

4 Based on what we received in comments this go-
5 round, I didn't see much of any clear information that
6 colors have become available. There were a number of
7 comments saying like, shouldn't they be? But not a lot of
8 specific, detailed information, which is the kind of thing
9 we like to see ideally to pull something off the list. So
10 yeah, for anyone listening or who has contacts in the color
11 industry, it'd be really helpful to get more specifics, and
12 particularly anybody who's selling organic colors in these
13 categories that are still on the list, we would love to hear
14 from you for the fall, or before then. Feel free to reach
15 out.

16 Any other questions or discussion on colors?

17 (No response.)

18 CORNSTARCH (NATIVE)

19 VICE CHAIR JOHNSON: All right. Thank you all.
20 Next up -- and this should be a fun one -- is Cornstarch
21 (native), with Carolyn.

22 BOARD MEMBER DIMITRI: Great. As it turns out,
23 all three of my products are fun ones. Another unexpected
24 pleasure of the surprises you get through public comment.

25 Okay. So I think everyone knows what cornstarch

1 is. It's a thickener, and I won't go into all the detail of
2 what it's used for. And so in the 2020 sunset, six people
3 wanted to have it removed, and nine people voted to have it
4 stay on the list, because at that time there was concern
5 about whether there was actually sufficient supply, and some
6 of the public commenters at that time said that there had
7 been like one or two moments where there was like a break in
8 the supply of organic cornstarch.

9 But so then we got a new TR, and one of the
10 questions that the TR pointed out was, in 2020, there was
11 also this debate about whether organic cornstarch could act
12 the same way as conventional cornstarch. And the TR wasn't
13 really able to answer that question for us. But I think the
14 public commenters did.

15 And so, basically, almost all of the commenters
16 suggested that there is currently sufficient supply of
17 organic cornstarch now. And there is, I would say, like
18 99 percent of the comments were to support removing it from
19 the list. So then I don't think this non-GMO based
20 conventional cornstarch question is necessarily relevant.

21 So I'll turn it back to you, Allison. That's what
22 I have to say on that product.

23 VICE CHAIR JOHNSON: Great. Thanks, Carolyn.

24 Comments or questions for Carolyn on cornstarch?

25 Andrea, go ahead.

1 BOARD MEMBER HATZIYINNIS: Hi. We had discussed
2 this previous, and there is sufficient supply of organic
3 cornstarch, so glad to see the industry has caught up. And
4 really interested in making sure the organic cornstarch is
5 matching the functionality of its non-GMO counterpart was
6 the challenge with this ingredient previous, so to hear from
7 the different users of the cornstarch -- because there is
8 wide application for this ingredient in the industry -- to
9 make sure it would not hamper any individuals using the non-
10 GMO cornstarch. So we'd love to hear more from the
11 stakeholders on this.

12 VICE CHAIR JOHNSON: Thanks, Andrea. Yeah, it's
13 great to have your history on this ingredient in the mix for
14 the discussion.

15 Amy, go ahead.

16 CHAIR BRUCH: Yeah. Thank you, Andrea, for that.
17 It's good to be linked together in the supply chain and hear
18 from our retailer on just availability of the organic
19 cornstarch. I'm just going to speak to the base material,
20 organic corn. We are ready and able to produce what's
21 needed. Please give us more market opportunities. But
22 there's been an incredible evolution of the amount of
23 organic corn grown in the Midwest, and frankly, it's a very
24 fun crop to grow, so it's a win-win here. Thank you.

25 VICE CHAIR JOHNSON: Thanks, Amy. Yeah, I'd love

1 to hear market opportunities for the grain growers who've
2 been showing up to comment.

3 Two public comments stood out to me. One was a
4 certifier who said the vast majority of their members are
5 using organic cornstarch now, so that was great to hear.
6 And I think molding was one application that was flagged as
7 maybe a remaining use of the non-organic cornstarch.

8 So as we're talking about organic snacks, those
9 lovely organic gummies, you put out a giant vat of
10 cornstarch, and push down on it with shapes, and then pour
11 your gummies into it. They rest and gel in this little
12 cornstarch bed and then eventually are taken out. So it
13 takes a lot of cornstarch. You're not talking about a
14 spoonful in a recipe. You're talking about giant vats of
15 it, almost as equipment.

16 And we did hear from one other public commenter
17 who mentioned that and said that the supply is there even
18 for that application. So I felt really good about being at
19 or very near the tipping point for this material. And just
20 as a reminder, if we did vote to remove a material from the
21 list, it still goes to the NOP for rulemaking. There's
22 another round of public comment before it would eventually
23 come off the list, so that leaves in another buffer of time
24 for the market to step up and meet an opportunity if that's
25 needed. So, really appreciated all the input that we heard

1 so far on this material.

2 Amy, go ahead.

3 CHAIR BRUCH: Allison, you're just kind of
4 triggering some fond memories of mine. Prior to getting in
5 the farming world, I did work for a large CPG in their fruit
6 snacks division. I was a packaging engineer for one of the
7 fruit snack lines. So I will reach out to this large CPG
8 and then ask them if they wouldn't mind commenting publicly
9 just to get another industry perspective on this, but that,
10 I would say, I think there hopefully should be no barriers
11 to go forward with this one. I'm going to flag that for
12 response in the public comments because we use the spring
13 meeting again to signal to our community what's to come in
14 the fall on these substances.

15 So thank you, Allison.

16 CHAIR BRUCH: Thanks, Amy.

17 VICE CHAIR JOHNSON: Yeah, and so one that we're
18 really considering sun setting I don't think would be
19 appropriate for a group vote. So just to state that
20 explicitly, this one will be definitely up for some good
21 discussion in the fall.

22 Any other comments or questions on cornstarch?

23 (No response.)

24 GLYCERIN

25 VICE CHAIR JOHNSON: All right. I think we can

1 move on then. Next up is glycerin. Sticking with Carolyn.

2 BOARD MEMBER DESCHENES: So even though we had no
3 questions for our stakeholders, we did get multiple comments
4 on this product. And this product is, well -- oh, it's used
5 as a binder, humectant, solvent, and carrier. And so the
6 comments, I put them in roughly three categories.

7 So one category is, well, in 2018, this product
8 was classified from synthetic to agricultural, and there was
9 a lot of questions about whether this is really an
10 agricultural product, and should it be reclassified as
11 synthetic? And it has to do with the process that it's
12 created, hydrolysis of fat. I'm an economist, so I will
13 leave that to people like Allison who understand organic
14 chemistry to explain what that is. So there's that one
15 question.

16 The other comments circle around many people said
17 that there's a robust supply of organic glycerin, so it
18 should be delisted. And at the last, the 2020 vote, two
19 people had voted to remove it at that point in time -- just
20 for some historical context -- and then there is some
21 support for keeping the status quo. So I think, well, for
22 one, this definitely -- this can't go in the slate for the,
23 you know, vote one at a time. But I don't know, like these
24 are three compelling reasons, they're very different, and so
25 I turn it over to everyone else on the Board to talk about

1 it and maybe provide some insight that an economist wouldn't
2 have into this product.

3 VICE CHAIR JOHNSON: Thanks, Carolyn.

4 Any comments or questions on glycerin? Anyone
5 have any insight into the organic availability?

6 Amanda, go ahead.

7 BOARD MEMBER FELDER: Yeah, so I've used this as a
8 processing aid, and my understanding of the availability of
9 organic versus not, and agricultural versus synthetic, from
10 what I understand it's next to impossible to tell the
11 difference if something was made synthetically or not. So
12 unless you're watching the manufacturing process from a
13 fraud standpoint, it's hard to validate as a purchaser. And
14 from what I -- the glycerin that we've used is a liquid
15 base, which is really hard to find. Most comes solid. It's
16 hard to find it. I think it's a 90/10 split where it's
17 10 percent glycerin, 90 percent water.

18 And so the country of origin is mostly out of
19 India, and so we already know that that's a high fraud area
20 as an industry. And so my concern is, is there more
21 availability outside of just that area?

22 From my experience from the ingredients that I've
23 used, that's where it's been sourced, and so I don't know,
24 maybe there's others that aren't in that sense. But I'd
25 like to hear from community countries of origin for

1 glycerin, just from a fraud standpoint of not forcing -- if
2 we take this off the list, then if 90 percent of supply is
3 coming from a high-risk area, are we opening ourselves to a
4 different problem?

5 VICE CHAIR JOHNSON: Interesting. Thank you,
6 Amanda.

7 Any other comments or questions?

8 All right. Oh, go ahead, Carolyn.

9 BOARD MEMBER DIMITRI: I was just going to say
10 that I think maybe when we put the list out for public
11 comment, we can just have some more clear questions and
12 collect more information. It sounds to me that we don't
13 really know enough to make a decision about whether it
14 should be removed or kept on the list, but maybe we're
15 moving in that general direction. So we could start
16 building up the body of evidence, so when it comes up for
17 the next review, there will be more for people to consider.

18 VICE CHAIR JOHNSON: That makes sense. That
19 sounds good, Carolyn. Thank you.

20 INULIN-OLIGOFRUCTOSE ENRICHED

21 VICE CHAIR JOHNSON: All right. I think we are
22 sticking with Carolyn for one more, inulin-oligofructose
23 enriched.

24 BOARD MEMBER DESCHENES: Okay. Also, this was
25 another surprise one. For this one I had to actually reach

1 out to some of our stakeholders last night, and they were
2 really helpful in providing some information to me.

3 Okay. So inulin is a non-digestible carbohydrate.
4 It has many uses. One of them is as a soluble dietary
5 fiber.

6 So if you go back to 2015, this product was
7 unanimously voted off the National List, and then if you go
8 to the 2020 vote, basically everyone voted to keep it on the
9 list. So this seemed to be a little bit of a mystery to me.
10 And a lot of public of comments said, well, this was voted
11 off the list in 2015, the NOP didn't remove it, so go ahead
12 and take it off the list now.

13 But it turned out there is this 2017 letter to the
14 National Organic Program -- which I guess I could have just
15 asked Michelle and she probably would have been able to tell
16 me about it -- which I can share with everyone else on the
17 Board, that basically said that there are two kinds of
18 inulin. One is a long-chain inulin from the root of the
19 chicory plant, and it is a linear molecule. Again, that
20 makes no sense to me. That's the product that's on the
21 list.

22 There's another product called organic agave
23 inulin, which is what the 2015 Board thought it was voting
24 on, and it has a different property. So I think, yeah,
25 that's what I know. And so apparently when the Board in

1 2015 voted, they were voting on something else. And then in
2 2017, there was a letter to the NOP, and it was kept on the
3 list. And then the 2020 Board, when it reviewed it, didn't
4 have any problem -- this didn't come up. It wasn't even in
5 the record of the discussion at that point in time.

6 So I think also, like I don't think that we should
7 put this in the packet to vote on because I think people in
8 the public comment might want to hash this out a little bit
9 as we come to an agreement about what happened.

10 VICE CHAIR JOHNSON: Thanks, Carolyn. And thanks
11 for the sleuthing. It's so interesting trying to retrace
12 the steps on some of these materials. You have breadcrumbs,
13 but they're not always laid out super explicitly. So
14 hopefully we'll be able to incorporate a little bit more
15 information about the history as we head into the fall.

16 Any comments or questions for Carolyn on this
17 material?

18 (No response.)

19 VICE CHAIR JOHNSON: All right. So if anyone's
20 producing it organically out there, we want to hear from you
21 over the summer and before the next meeting, in public
22 comments. Thank you.

23 Well done on some squirrely ones, Carolyn. Thanks
24 for digging in.

25 BOARD MEMBER DESCHENES: Thanks, Allison.

1 ORANGE SHELLAC

2 VICE CHAIR JOHNSON: Okay. Last but not least, we
3 have orange shellac. So, Kyla, wrap us up here.

4 BOARD MEMBER SMITH: Yep. Okay. So orange
5 shellac is another fruit coating. So this is the coatings
6 meeting, apparently. Coatings and colors. And this is used
7 as an ingredient, additionally, in lozenges, capsules, and
8 tablets, and also part of confectionary glazes on candy,
9 chocolate, and coffee beans.

10 This was unanimously relisted at the last sunset
11 review. There were a handful of commenters that supported
12 relisting this round, citing essentiality and lack of
13 alternatives. One commenter suggested an annotation
14 limiting certain ancillaries as well as certain labeling
15 requirements, which also got brought up in the other
16 coatings that were discussed previously. The Subcommittee,
17 again, can evaluate these potential annotation changes and
18 decide whether to bring forth a parallel proposal.

19 Another commenter indicated that we as a Board
20 must evaluate the use of pesticides in the non-organic
21 production of the host species, which this comes from the
22 hardened secretion from a parasitic insect, popularly known
23 as the shellac insect. And the primary area in the world
24 where this is produced is India, Thailand, and Myanmar.
25 And also that commenter suggested exploring the potential

1 availability of organic orange shellac.

2 So, again, based on where this is predominantly
3 produced, it is unclear whether or not there is the ability
4 to -- whether or how much organic oranges are produced, or
5 how much of these insects and the trees that they're -- the
6 sap from the host trees, and all of that production, whether
7 or not the ability for having that as organic as possible in
8 those regions.

9 We did ask a question about the essentiality,
10 specifically what organic products this is used for and why,
11 in particular, orange shellac must be used. And we just got
12 one commenter indicating, again, that they use it
13 specifically as a fruit coating and an outer chocolate
14 coating, but they didn't necessarily get into why this
15 coating is required versus another one on the list.

16 Okay. And so, again, I know that six of these
17 materials -- as we've already said -- are being considered
18 as whether or not they should be part of the group vote, and
19 that we'll further discuss that at subcommittee. But based
20 on the fact, again, that this material was unanimously
21 relisted at the last sunset review, and that there isn't or
22 hasn't been new information presented regarding the
23 availability of organic orange shellac -- it's a little bit
24 of a tongue twister -- I do think that this material could
25 be considered eligible for the group vote at the fall

1 meeting.

2 VICE CHAIR JOHNSON: Great. Thanks, Kyla. And I
3 know in the fall we had some discussion about standards for
4 insect production -- organic insect production, so it sounds
5 like this is another potential area of application if we're
6 going to go down that road. So interesting stuff.

7 Anyone have questions or comments about this
8 material?

9 (No response.)

10 VICE CHAIR JOHNSON: All right. I think that
11 concludes Handling.

12 Back to you, Amy. Thank you.

13 CHAIR BRUCH: Excellent. Thank you so much,
14 Allison, for leading that discussion and all the
15 participation in that review. That was tremendous. And we
16 did highlight the need to, you know, continue to receive
17 public comment, especially on a few of these items that we
18 deemed maybe at risk of being just delisted, so please
19 provide us public comments.

20 Yeah. Nate, go ahead.

21 SECRETARY LEWIS: Yeah. Just again, for
22 transparency and the record, I just wanted to acknowledge
23 that only three of the handling materials were identified as
24 eligible for this group vote approach. So in subcommittee,
25 let's assess whether a whole 'nother voting procedure might

1 actually -- you know, is the juice worth the squeeze? Let's
2 keep thinking about that.

3 VICE CHAIR JOHNSON: I appreciate that.

4 Logan, go ahead.

5 BOARD MEMBER PETREY: And actually, too, I need to
6 remove carnauba wax from that because I had that wrong. The
7 previous Board voted three in favor of relisting and three
8 opposing its relisting, so it cannot be part of the group
9 vote. Not eligible.

10 CHAIR BRUCH: Thank you, Logan, for that
11 correction.

12 VICE CHAIR JOHNSON: Wait, Logan, you said three
13 and three. Was that the Subcommittee vote? Or was that --

14 BOARD MEMBER PETREY: No, Eleven and three.

15 VICE CHAIR JOHNSON: Eleven. I thought you said
16 three and three. Thank you.

17 BOARD MEMBER PETREY: I'm sorry. Eleven and
18 three. Thank you.

19 CHAIR BRUCH: Allison, go ahead.

20 VICE CHAIR JOHNSON: Yeah. Thanks for pointing
21 that out, Nate. And just to additionally flag that there
22 were a number of materials that I think would typically be
23 unanimous, no new info, but we got TRs for them this time
24 around because they were very old. So this may be an
25 outlier year, but, you know, point taken, and let's keep

1 taking a look at all these materials and see what they look
2 like going forward.

3 CHAIR BRUCH: Great. Thank you again, Handling
4 Subcommittee. That was incredible.

5 I'm going to be passing the gavel to Logan Petrey
6 to facilitate the Crops Subcommittee discussion, and Logan
7 is the chair of the Crops Subcommittee.

8 I really appreciate your leadership. Go ahead,
9 Logan.

10 CROPS SUBCOMMITTEE

11 BOARD MEMBER PETREY: Yeah, thank you. And thank
12 you for all the help.

13 She was my Vice Chair, now it's Nate is my Vice
14 Chair this year. So we have a smaller subcommittee this
15 semester, but we have two of our new members. We have Corie
16 on and Amanda is on. So, glad to have them on, their
17 experience.

18 Okay. So moving on, we just want to let everybody
19 know we do have a pending technical review -- and that's for
20 compostables -- we will be going over today. We have two
21 proposals and a discussion document, and we have 14 sunsets.

22 Thank you, stakeholders, for all your oral and
23 written comments. We greatly appreciate those.

24 We're going to go ahead and get started today with
25 Franklin and the Pear Ester proposal.

1 PROPOSAL: PEAR ESTER - PETITIONED

2 BOARD MEMBER QUARCOO: Can you hear me?

3 BOARD MEMBER PETREY: Yes.

4 BOARD MEMBER QUARCOO: Well, I'm on my phone
5 because I've had connection issues for a couple of hours.
6 Hopefully this will take me all the way to the end.

7 So Pear Ester. So all of this started in 2023
8 based on a petition that the National Organic Program
9 received to add Pear Ester to the National List. Pear Ester
10 is actually a kairomone. It used to be classified together
11 with other chemicals like pheromones, and so it was used
12 under that until its reclassification -- correct
13 reclassification as a kairomone, and with that, it was now
14 in a separate category not covered by what it used to be
15 covered by. It is produced by a quantization reaction
16 between two chemicals that are byproducts of petroleum
17 processing.

18 A few things about Pear Ester. It appears on the
19 FDA's list of substances added to food, and also the EPA has
20 registered it for pest management. It is particularly
21 important in the management of the coddling moth, which is a
22 significant and major pest that affects apple, pear, and
23 walnut crops.

24 So in 2024, we had a technical report on Pear
25 Ester, which has detailed information on significant

1 improvement in pest management when Pear Ester is used.
2 Just to summarize this so we don't go too much into the
3 weeds, when pheromones are used, they typically attract the
4 female insect. So when you are trying to trap so that you
5 can determine the best time to apply treatments, or you are
6 trying to do mating disruption, well, if the insects are no
7 longer at the stage where they are being attracted to
8 pheromones, a kairomone enhances that. You put them
9 together. Kairomones, these are food colors. So whether
10 you are female or male, they still have to eat, and they
11 respond to that. So it generally improves the performance
12 of just trying to monitor and find out what is there and
13 when to control.

14 So the comments that have been received by farmers
15 who use these, food producers, it is extremely important.
16 Okay. We've discussed this once. Let me go to some of the
17 public comments. But within the Subcommittee, we had
18 discussions -- that was for 2024 -- we had discussions on
19 the previous misclassification. We talked about the
20 essentiality of Pear Ester to the fruit industry. Well,
21 when it comes to comments, a commenting organization stated
22 that a synthetic Pear Ester based mating disrupt are
23 generally recognized as safe.

24 So we had comments on both sides. Most of the
25 comments that were not for it or partly not for it had to do

1 with micro-encapsulated versions of the product. The
2 product itself, if it is sprayed or deployed other ways,
3 that's fine, but when you use micro-encapsulated
4 formulations, which are made up of microplastics. So those
5 are the comments that came from the public. An annotation
6 was requested so that it will be allowed for use but not
7 with the micro-encapsulated formulation, which I said is
8 like a microplastic. And so the request was made to add an
9 annotation to this proposal.

10 And also, because it was not previously listed on
11 its own, the Subcommittee voted to list it and all of that
12 independently from their pheromones. So that about covers
13 the stuff.

14 The main hazards have to do with the micro-
15 encapsulated formulations, and that was the main part of the
16 public comments against just going ahead with Pear Ester as
17 it is without indicating the formulation. But that's the
18 summary of the proposal, as it is. Thank you.

19 BOARD MEMBER PETREY: Okay. Franklin, I
20 appreciate it. You're the great person to lead this.
21 Your expertise in this area, it shows. Thank you so much.

22 Okay. Opening up to questions.

23 Brian.

24 BOARD MEMBER CALDWELL: Yeah, thanks, Franklin.
25 Your expertise is really, really valuable, so we really

1 appreciate that.

2 I kind of have a couple questions. First of all
3 -- and these may be for a wider range of our committee --
4 but I think that there's a strong movement amongst the
5 stakeholders to add an annotation to this to prevent it from
6 being used in this micro-encapsulated form, which makes a
7 lot of sense to me.

8 And there's a couple questions I have. First of
9 all, I want to be sure that we can do that. The way I
10 remember it was that we had put a mechanism in place so that
11 we could create an annotation that would be a separate vote,
12 but still both of them would be in the fall meeting, so
13 they'd be at least at the same meeting so that we would kind
14 of keep the topic together. So we would vote first on the
15 actual listing, and then there'd be a later vote on the
16 annotations. So if I'm wrong on that one.

17 But the other thing is that if these micro-
18 encapsulation materials are not either listed as inerts or
19 approved, you know, on the National List somewhere, can a
20 product use them and be approved for organic? In other
21 words, would it automatically be disqualified from organic
22 if it had these micro-encapsulated substances in it? So
23 those are my two questions. One about the annotations, and
24 the second one about whether the micro-encapsulation would
25 be subject to just general organic regulations.

1 BOARD MEMBER QUARCOO: Okay, I'll take your second
2 question first. That was the thinking that the micro-
3 encapsulated materials, if they are not on the National List
4 that -- but I do agree with the commenters who said let's
5 just put it as an annotation. If those things are not
6 consistent with what we're doing, we put it there as an
7 annotation that clarifies it.

8 And so I'll take that one first. But if you rely
9 on a far-fetched control where it's not explicitly stated in
10 the document you are looking at, I prefer the annotation at
11 this point. So at this point, I'm inclined to suggest that
12 -- like the comment indicated -- that we send this back to
13 subcommittee and introduce an annotation.

14 BOARD MEMBER DESCHENES: Great, thanks, Franklin.
15 Yeah, that makes sense to me too.

16 BOARD MEMBER PETREY: Oh, I'm sorry. We didn't
17 answer your first question, Brian.

18 Does anybody know the answer for the annotation?

19 Okay, Nate.

20 SECRETARY LEWIS: Yeah, so I'll jump in on that
21 question. Brian, you are correct about the parallel
22 motions, but that would be for sunset materials. Here we're
23 dealing with a new petition for a new substance, right? So
24 I think the proper way to do this would be -- as Franklin
25 suggested -- if we do want to consider an annotation, to

1 send it back to subcommittee so that we can really vet that
2 and then bring forward some language.

3 We may choose in the fall to maybe bring both
4 forward, one with an annotation, one without. But the
5 parallel track really was a setup for sunset materials where
6 we want to have a vote on whether the current listing should
7 be renewed, and then also a consideration for potential
8 change.

9 So, yeah, and so in terms of the annotation and
10 sending it back to subcommittee, I too was swayed by the
11 concept or just sort of being made aware that there are
12 other formulations. My understanding in Washington and the
13 Pacific Northwest, where a lot of this stuff is used, is
14 that it is the passive dispensers and the puffers that it's
15 used in.

16 So these are, you know, they're active but they're
17 within a trap, and so the microencapsulation is not
18 something that's typically used by the tree fruit industry
19 up here, and from what I understand, an annotation to
20 restrict that use wouldn't be disruptive at all. And so I
21 sort of, again, want to just, you know, I think it's
22 worthwhile considering it, and then also determining whether
23 or not the impacts are, you know, warrant the extra
24 rulemaking that might be involved in the annotation.

25 But a point well-taken in terms of inert

1 substances and considerations on microencapsulation. If we
2 haven't really considered and debated those topics to the
3 satisfaction of the Board and the Subcommittee, the proper
4 thing to do is send it back for another round, in my view,
5 and to take a look and really push out those issues so we
6 can come to the conclusions that are elevated around that
7 issue.

8 BOARD MEMBER PETREY: Amy.

9 CHAIR BRUCH: Yeah, excellent, Franklin. Thank
10 you so much for leading this discussion.

11 Brian, thanks for the training opportunity there
12 on our annotation process that we were using for sunset. So
13 that was a good discussion.

14 And yeah, Nate, I, from, you know, just it's
15 helpful to hear from the Northwest and that perspective.
16 It sounds like the coddling moth I think is where maybe this
17 is really the most beneficial. And from a grower point of
18 view, at least what I gather from the public comments, the
19 written ones, you know, being able to have this in the trap
20 form sounds like really positive from a grower point of
21 view.

22 And I didn't necessarily hear any other
23 essentiality for other mechanisms of it. So I think I'd be
24 in favor as well of sending it back to subcommittee and
25 working an annotation on the front end of this.

1 BOARD MEMBER PETREY: Okay. Kyla.

2 BOARD MEMBER SMITH: Yes, I am not on the Crops
3 Subcommittee, so I always appreciate the discussions here
4 because I learn a lot. And I don't think this got
5 mentioned, but there was also a comment questioning whether
6 or not 205.601(j), which is plant or soil amendments, is the
7 correct placement on the list, and so if this is going back
8 to subcommittee, I would encourage the Crops Subcommittee to
9 take a look at the placement.

10 And perhaps it should go under (f) as insect
11 management, and maybe pheromones needs a (1) and Pear Ester
12 needs a (2) or something. I don't know. That could get
13 sorted out. But I think taking another look at the
14 placement would be good.

15 BOARD MEMBER PETREY: No, Kyla, that's a great
16 point. That in itself is probably worth going back to
17 subcommittee for. And I was thinking also when you have the
18 annotation of the microencapsulation, that sometimes it's
19 nice to see what to not do, you know, just specifically on
20 the list helps producers to really understand what is
21 allowed.

22 And so it can be, you know, protect as well
23 instead of you just have the material and you might think
24 that it's approved and not really thinking to the
25 microencapsulation. So that's a great point. And, yeah, we

1 do want to protect that as well, and if it's in that area,
2 then it's also in that correct lane.

3 All right. Any other questions, discussions?

4 (No response.)

5 BOARD MEMBER PETREY: Okay. I'm not seeing any.

6 CHAIR BRUCH: Logan, I'm going to jump in here
7 then, and thank you for leading that discussion. I want to
8 see if there's a motion here different than what we were
9 intending on doing with voting. It sounded like for
10 subcommittee, but I'd like for a member of the Board to
11 officially make a motion.

12 All right. Nate, I see your hand.

13 SECRETARY LEWIS: Well, I'll make a motion to send
14 the Pear Ester petition back to subcommittee.

15 CHAIR BRUCH: Excellent.

16 BOARD MEMBER QUARCOO: Second that.

17 CHAIR BRUCH: Okay. Thank you, Franklin. We have
18 a motion from Nate to send this back to subcommittee, and a
19 second from Franklin.

20 So Carolyn, you're going to start us off with the
21 vote.

22 BOARD MEMBER DIMITRI: Yes, send it back, please.

23 CHAIR BRUCH: Thank you for being kind there.

24 Amanda, go ahead.

25 The motion, as a reminder, is to send Pear Ester

1 back to subcommittee.

2 BOARD MEMBER FELDER: Yes.

3 CHAIR BRUCH: Thank you, Amanda.
4 Andrea.

5 BOARD MEMBER HATZIYINNIS: Yes.

6 CHAIR BRUCH: Allison.

7 VICE CHAIR JOHNSON: Yes.

8 CHAIR BRUCH: Nate.

9 SECRETARY LEWIS: Yes.

10 CHAIR BRUCH: Cat.

11 BOARD MEMBER MCCLUSKEY: Yes.

12 CHAIR BRUCH: Dilip.

13 BOARD MEMBER NANDWANI: Yes.

14 CHAIR BRUCH: Could you say that one more time?

15 BOARD MEMBER NANDWANI: Yes.

16 CHAIR BRUCH: Thank you.
17 Logan.

18 BOARD MEMBER PETREY: Yes.

19 CHAIR BRUCH: Corie.

20 BOARD MEMBER PIERCE: Yes.

21 CHAIR BRUCH: Franklin.

22 BOARD MEMBER QUARCOO: Yes.

23 CHAIR BRUCH: Kyla.

24 BOARD MEMBER SMITH: Yes.

25 CHAIR BRUCH: Javier. Absent.

1 Brian.

2 BOARD MEMBER CALDWELL: Yes.

3 CHAIR BRUCH: Kathryn.

4 BOARD MEMBER DESCHENES: Yes.

5 CHAIR BRUCH: And the Chair votes yes.

6 SECRETARY LEWIS: 14 yes, 0 no, 1 absent. The
7 motion carries. And just as a reminder for the audience and
8 Board members, this motion only required a simple majority,
9 but it was unanimous, so it passed anyway.

10 BOARD MEMBER PETREY: Great. Okay. Thank you.

11 PROPOSAL: COMPOST PRODUCTION FOR ORGANIC AGRICULTURE

12 BOARD MEMBER PETREY: All right. Moving along in
13 crops. We're going to go to the proposal for compost
14 production for organic agriculture.

15 Nate, take it away.

16 SECRETARY LEWIS: All right. So we're going to
17 pivot here into my favorite topic, which is compost. And I
18 wanted to provide the Board and the audience with a little
19 bit of an overview of where we are at in our journey through
20 compost, particularly with five new Board members on and
21 picking up the work of the Subcommittee and the Board as a
22 whole.

23 So compost is before us as a request from NOP to
24 provide feedback or recommendations on compost used in
25 organic production, covering a number of areas. Compost

1 production standards, time, temperature, carbon and nitrogen
2 ratios, contamination in compost, considerations of uric in
3 compost, and then synthetic substances used as feedstocks in
4 organic compost.

5 The work that we have done so far, we held an
6 expert panel on compost at our spring meeting in Milwaukee.
7 We passed a recommendation in the fall -- last fall in
8 Portland, Oregon -- which proposed updates to definitions
9 and practice standards. And we ordered a technical review
10 that reviewed the substances considered compostable in BPI's
11 petition for rulemaking. So these are substances that meet
12 the ASTM 6400-21, 6868-21, and 8410-21, composition and
13 compostability or biodegradability standards.

14 That TR was just deemed sufficient by the Crop
15 Subcommittee, and should be added and made publicly
16 available in short order. So that is going to be used to
17 inform our ongoing work.

18 Next slide, please.

19 So what we're working on today related to compost
20 is a two-part problem. The first part, which I'm hoping
21 that we can take up now, is a proposal. That proposal is
22 related to the underpinning for the evaluation of synthetic
23 compost feedstocks. And then we'll move into a discussion
24 document related to the compostable substances and their
25 merits. So first part is a proposal. Second part is a

1 discussion document.

2 And so for that proposal, the underlying issue
3 here is whether or not the NOSB has a role in evaluating
4 synthetic substances added to compost as feedstocks. So the
5 Board generally continues to believe that synthetic
6 substances intended to be added to compost must be added to
7 the National List. And we disagree with the BPI petition
8 approach which would include synthetic compostable
9 substances in a definition of compost feedstocks, which
10 would provide allowance for these substances without
11 National List review, approval, or the sunset process.

12 MR. ROSE: Our recommendation in the fall
13 essentially implemented this position that we have with a
14 proposed update to the regulation. But what we recognized
15 was, in order to enact that, we needed to have an update to
16 the regulation. Updates to regulations take time, and
17 there's uncertainty right now with our administration about
18 to what extent updates to the practice standards they're
19 going to pursue.

20 And so we wanted to circle back on the issue and
21 really just clarify what our position is with a proposal,
22 and that's what we have before us now. And so this proposal
23 clarifies NOSB's position on the review and approval of
24 synthetic substances used in organic compost.

25 And then I think the next slide has that proposal,

1 which -- oh no, there's a public comment summary slide,
2 which generally public comments demonstrated this consensus
3 among stakeholders that synthetic substances added to
4 compost should only be allowed if they're reviewed by the
5 NOSB and added to the National List with notice and comment
6 rulemaking.

7 And then I think the next slide does have our
8 motion. So I'll read it out loud and then let's take some
9 time to kind of dissect that and have a discussion around
10 this particular proposal.

11 So out of the Crops Subcommittee, it was motioned
12 by Mindee Jeffrey, my compost comrade extraordinaire who I
13 cherish so very much and whose shoes are hard to fill on the
14 Board. It was seconded by Logan.

15 The motion is to accept the proposal stating
16 synthetic substances intentionally included as feedstocks in
17 organic compliant compost must be evaluated by the NOSB,
18 recommended for addition to the National List by a two-
19 thirds vote of the NOSB, and added to the National List
20 through the federal register process of notice and comment
21 rulemaking by the NOP.

22 And so with that, I wanted to pause, answer
23 questions. Remember, if we are prepared to take this vote,
24 and we do, we will be moving into a compostable polymers
25 discussion. So we can pivot between the two of them, but I

1 kind of want to stay in our lane here around the concept
2 related to evaluation of synthetics in organic compost. So
3 with that, take questions, comments, discussion.

4 Allison, go ahead.

5 VICE CHAIR JOHNSON: Thanks, Nate, for guiding us
6 through this thorny compost issue. I think this step is
7 really clear and essential. Heard a lot in comments as far
8 as concerns about the composition of what materials could
9 end up in compost, what happens to them in the process, and
10 if we don't have this National List review step, those
11 questions go unanswered.

12 So reiterating that the process for reviewing
13 something that ends up in organic agriculture is the
14 National List, writing it down, making it crystal clear, is
15 a good next step and allows us to move ahead with the
16 process that we've laid out for taking a closer look at
17 these materials.

18 SECRETARY LEWIS: Thanks, Allison.

19 Go ahead, Amy.

20 CHAIR BRUCH: Thank you, Nate, for leading this
21 initiative. I think this is really important just for
22 clarity purposes. So this, in my opinion, is a needed
23 procedural vote.

24 I also appreciate you making mention of Mindee's
25 contributions to this. I know this was really an important

1 arena, just the compost subject matter was very important to
2 her, and I'm happy that we can elevate her in this
3 conversation too, and I appreciate that, Nate.

4 And I think Amanda is also kind of tapped to do
5 some heavy lifting in this area. So thank you, Amanda, for
6 that as well.

7 SECRETARY LEWIS: All right. Well, I guess
8 without further discussion on this portion of the compost,
9 I'll turn it back to you, Amy, to lead us in a vote.

10 CHAIR BRUCH: Sure. Appreciate that, Nate.

11 All right. We have a motion to accept the
12 proposal on compost production for organic agriculture. It
13 was motioned by Mindee Jeffrey and seconded by Logan Petrey.

14 Our first Board member to vote is Amanda.

15 (No audible response.)

16 SECRETARY LEWIS: Didn't catch that, Amanda. If
17 you can repeat.

18 BOARD MEMBER FELDER: Yes.

19 CHAIR BRUCH: Thanks, Amanda.

20 Andrea.

21 BOARD MEMBER HATZIYINNIS: Yes.

22 CHAIR BRUCH: Allison.

23 VICE CHAIR JOHNSON: Yes.

24 CHAIR BRUCH: Nate.

25 SECRETARY LEWIS: Yes.

1 CHAIR BRUCH: Cat.
2 BOARD MEMBER MCCLUSKEY: Yes.
3 CHAIR BRUCH: Dilip.
4 BOARD MEMBER NANDWANI: Yes.
5 CHAIR BRUCH: Logan.
6 BOARD MEMBER PETREY: Yes.
7 CHAIR BRUCH: Corie.
8 BOARD MEMBER PIERCE: Yes.
9 CHAIR BRUCH: Franklin.
10 BOARD MEMBER QUARCOO: Yes.
11 CHAIR BRUCH: Kyla.
12 BOARD MEMBER SMITH: Yes.
13 CHAIR BRUCH: Javier. Absent.
14 Brian
15 BOARD MEMBER CALDWELL: Yes.
16 CHAIR BRUCH: Kathryn.
17 BOARD MEMBER DESCHENES: Yes.
18 CHAIR BRUCH: Carolyn.
19 BOARD MEMBER DIMITRI: Yes.
20 CHAIR BRUCH: And the Chair votes yes.
21 Turning it back over to you, Logan.
22 SECRETARY LEWIS: Well, I'll just --
23 CHAIR BRUCH: Oh, sorry. Nate first. Yeah, sorry
24 about that.
25 Go ahead, Nate.

1 SECRETARY LEWIS: 14 yes, 0 no, 1 absent. The
2 motion carries.

3 BOARD MEMBER PETREY: Oh, I forgot about that
4 part. I'm in it. Just keep on rolling. You got two laps,
5 two laps of this race.

6 SECRETARY LEWIS: Just keep going, Logan.

7 DISCUSSION DOCUMENT: SYNTHETIC COMPOSTABLE POLYMERS

8 BOARD MEMBER PETREY: So yeah, moving on to our
9 next discussion for compost, synthetic compostable polymers.

10 SECRETARY LEWIS: Yeah. So let's move to the next
11 slide. Great. So there's a couple of bits of nerd humor in
12 the next little bit here.

13 So this is a broad group of substances,
14 compostable substances, and the term that we developed with
15 the authors of the technical review were compostable
16 synthetic food packaging plastics and cellulosic fiber-based
17 materials. So I think we should come up with a great
18 acronym, so maybe something like that will be helpful for us
19 to consolidate the words.

20 But we did, as I mentioned, order a TR for this
21 group of substances. We've received the TR, deemed it
22 sufficient, and it will be made public shortly. So I'm
23 really eager to hear comments back from the public on the TR
24 itself, on the substances themselves.

25 And because it is a broad group of substances, the

1 TR kind of focused on a number of different questions we
2 had. But I think it's important to know to what extent we
3 were able to capture the universe of these substances and
4 their pros and cons and their composition. So we really
5 look forward to hearing public comments on that.

6 I will say that we do have a goal to consider the
7 substances that meet these three standards, and those three
8 standards were the ones included in the BPI petition. And
9 the goal is to really consider them and give them a fair
10 shake for inclusion on the National List. And what I hope
11 we can do is bring forward a motion in the fall to add them
12 to the National List and see how that works with the Board.

13 We could include some limited use patterns via
14 annotation. We've heard a number of public commenters
15 indicate there's potentially some interest in looking at
16 fruit stickers, which are a problem right now and
17 potentially a contamination issue that could be solved with
18 these types of substances. There's also, similarly, concern
19 about engaging in single-use plastics, whether it's
20 compostable or not, and so an annotation that's related to
21 use patterns could be something we could consider. We also
22 could consider a recommendation to amend the current
23 annotation for paper. There's a lot of comments about that
24 being a little outdated, and so I think that's also on the
25 table.

1 Next slide, please.

2 So just again, these considerations, I want to
3 sort of preload the conversation that organic compost is
4 fundamentally made up of plant and animal materials. That's
5 what compost is. That's part of the rule in the practice
6 standard.

7 And the only allowed synthetic feedstock, which is
8 paper, is allowed primarily for leaf collection bags. So it
9 means its allowance is because it helps enable the
10 collection of plant material for composting, not necessarily
11 because it's a great compost feedstock itself. Paper does
12 have some value there, but its primary use and allowance on
13 the National List is to collect leaves in the fall and use
14 that as a carbon source for composters.

15 So, similarly, compostable polymers have the
16 potential to bring more food waste out of the landfill and
17 into composting operations. Using compostable polymers
18 instead of traditional plastics in items that regularly
19 contaminate compost, like fruit stickers, could reduce
20 plastic contamination in compost.

21 But compostable polymers are a potential
22 contamination vector, so either from the substances
23 contained within the polymers themselves or by creating
24 compostability confusion and increasing the inclusion of
25 traditional non-compostable plastics in compost.

1 So we have heard from composters that compostable
2 plastics are indistinguishable from traditional plastics,
3 and so they work hard to just remove anything that appears
4 as though it's plastic to begin with, which sort of
5 diminishes the value, in my view, of these substances in
6 compost piles. So anyway, I don't want to present these as
7 conclusions. I want to present these as considerations.
8 These are some underpinnings of that.

9 Next slide, please.

10 So I wanted to get into a little bit of a personal
11 thing here. So this is literally from this last weekend.
12 The serendipity of this is kind of hard to guess.

13 So I was spreading compost on our farm, and the
14 compost on our farm is primarily animal processing offal,
15 vegetable garden waste, and wood chips. But I found a
16 compostable fork or the handle of some sort of compostable
17 utensil. So this is something that went through high heat
18 composting, aging, curing, and you could still -- I mean,
19 it's kind of hard to see here -- you could still read the
20 compostable language there on the fork.

21 So in my view, this is not a compostable item --
22 and I might be risking our certification here -- but
23 luckily, that didn't get composted and included in the
24 compost that we spread on our organic farm. But I just
25 wanted to bring it up that there is a range of durability of

1 these substances.

2 But then also the third picture -- again, it's
3 kind of hard to see -- that is actually pig hair. And so we
4 raised pigs and slaughtered them on farm and then composted
5 the hides and all the offal. Everything went through except
6 for the pig hair.

7 So pig hair is very clearly an allowed compost
8 feedstock as an animal material, but it is also very durable
9 and clearly did not break down to composting in a high heat
10 situation. So just wanted to share kind of a personal
11 experience with durability and compost and the
12 considerations that we should be taking into account as we
13 engage in this conversation.

14 Next slide.

15 So this is just a list of the questions that we
16 put forward on the discussion document. We got a lot of
17 great comments from folks. I really look forward to diving
18 into the public comments submitted for this meeting in
19 subcommittee deliberations between now and the fall meeting.
20 I think everyone's perspectives are being taken into account
21 and really just appreciate the depth of knowledge and
22 interest in the stakeholder community around this issue.

23 And I think I'll go ask for the next slide, and then I
24 think we're moving into discussion mode at this point.

25 So yeah, we did a subcommittee vote to accept this

1 discussion document, but again, we are not voting on it.
2 And so I think now is time to open it up to folks' comments
3 and questions related to compostable polymers.

4 And, Brian, I see your hand. Go ahead.

5 BOARD MEMBER CALDWELL: Well, thanks. Thanks,
6 Nate. As usual, a fantastic job you've done with this.
7 It's really wonderful.

8 A couple things. I think that people are going to
9 be really pleased when they see the technical review which
10 was done. It seemed incredibly thorough, and it's going to
11 help us make our way through all this.

12 The other thing I wanted to point out was that I
13 attended the National Organic Coalition meeting, the pre-
14 meeting a couple days ago. They had an excellent panel
15 discussion about this issue, and I'm pretty sure that we can
16 get recordings of it. So I would strongly advise folks, if
17 you have a strong interest in this, to get in touch with
18 NOC. And I'll send the link around to the Board. But for
19 our stakeholders here, really, really an excellent panel
20 presentation.

21 SECRETARY LEWIS: Yeah, great. Thanks, Brian. I
22 heard that as well, and I look forward to watching that
23 recording.

24 Kyla?

25 BOARD MEMBER SMITH: Thanks, Nate. I don't know

1 if this is the most appropriate context for this comment,
2 but you sort of opened the door in the consideration of
3 paper in general, I guess, in compost feedstock. And so
4 I'll just toss this into the soup pot for consideration in
5 regards to paper as a compost feedstock. But then also, I
6 think it's next year that paper pots -- I forget the whole
7 name because it's long.

8 SECRETARY LEWIS: I think it's this year.

9 BOARD MEMBER SMITH: It's this year?

10 BOARD MEMBER PETREY: Yeah, we have it coming up
11 later on.

12 BOARD MEMBER SMITH: Okay, yeah. Oh, that paper.
13 There it is. It just says paper. Well, yeah. So there's
14 like some ASTM requirements and like bio-based stuff, and
15 then the BBMF review is sort of like on hold. And there was
16 the memo back to the Board that it's like in this same realm
17 with like the ATMS standards and the bio-based content.

18 And so it's just like all this swirly, twirly like
19 paper things. And it would be nice, I think, for them to be
20 looked at wholly, a comprehensive review of paper on the
21 National List, and maybe trying to align some of the
22 requirements and annotations, I think, could be useful.

23 SECRETARY LEWIS: Yeah, that's a great comment,
24 Kyla, and a totally appropriate time to bring it up. I
25 agree that the paper pot annotation is certainly a more

1 modern or a more current way to evaluate paper and restrict
2 it so that we're kind of limiting what can go into it. What
3 I don't know is whether the things that you need to make a
4 paper pot align with the things you need to make a leaf
5 collection bag or, you know.

6 But again, I totally hear you that, yes, we should
7 be looking at those comprehensively. And the timing is
8 great in terms of looking at paper pots and the sunset
9 review and potentially bringing up an update to the listing
10 for compost feedstocks with paper. Yeah, great point.

11 Go ahead, Amy.

12 CHAIR BRUCH: Yeah, Nate, thank you so much for
13 your leadership on this topic. Not an easy one, and I
14 appreciate, you know, just you demonstrating on both sides
15 of the equation here.

16 Before I comment, I just wanted to invite
17 Franklin, if you're able to, to weigh in on a few things
18 just before I comment. I just always appreciated your
19 perspective on this subject in subcommittee just with your
20 background, and you were really looking at overall impact to
21 the soil. So I just want to turn it over to you first
22 before I go, sir, if you don't mind.

23 BOARD MEMBER QUARCOO: No problem.

24 CHAIR BRUCH: Thank you.

25 BOARD MEMBER QUARCOO: So microorganisms or life

1 forms, sometimes we have what we call bioremediation. So
2 there are actually plants where, when you put in some heavy
3 metals and other things that are not supposed to be in the
4 soil, they take it out. This is nature trying to clean up
5 after us.

6 But any time nature cleans up after us, we have to
7 ask ourselves whether there is a fitness cost. So when it
8 comes to soil microorganisms, there are going to be
9 microorganisms where you put synthetic material there that
10 doesn't break down completely.

11 it doesn't break down completely -- or even if it
12 does break down, and there are microorganisms of various
13 kinds trying to break it down -- my question is, when you do
14 that when you are trying to make the compost, that's one
15 thing.

16 When you set it out there, and these
17 microorganisms are left with we're trying to break it down,
18 what is the fitness? Is it a natural selection factor?
19 Does it now eliminate those who are not fit after going
20 through the ordeal of dealing with it, so that we finally
21 end up with a certain group of microorganisms that is not
22 the original? The population may have changed.

23 And I brought this up some time ago, and I'm
24 beginning to see research publications and other research
25 that is saying, yes, that might be the case.

1 And so it's a good thing we are discussing this.
2 And I just suggest that we keep an open mind. We don't just
3 look at the chemical part of it. We look at the soil as a
4 whole system on its own. We just can look at it.

5 And even if we use standards that say it breaks
6 down after 180 days, what happens after the 180 days, what
7 is happening after the 180 days? What is happening after
8 that?

9 So my thing is just so we are careful that in
10 trying to find a place for what is arguably a better form of
11 plastic, which is better than the previous one, we don't use
12 compost as a place to take it if there is a plastic problem
13 that needs to be solved anyway, which we all know there is a
14 plastic problem.

15 SECRETARY LEWIS: Yeah, thanks, Franklin. And I
16 think this really brings up sort of part of the magic of
17 compost is that we already know that the way the feedstocks
18 you use in your compost pile shift population. So if you
19 have one that is primarily of woody degree, you will have a
20 higher fungal population. If you have more food waste and
21 manure based stuff, you will have a higher bacterial
22 population. And those have different impacts to soil
23 biology in the impacts they have.

24 So this is well known that the population of what
25 you have in your compost affects the soil biology. So I

1 think it makes a lot of sense to really hone in on that
2 topic as it relates to these compostables and whether they
3 push populations in one way or another, and ultimately what
4 the impact is to the soil because that is the core benefit
5 that we're looking for here. So really appreciate you
6 driving that conversation.

7 Amy, go ahead.

8 CHAIR BRUCH: Yeah, thank you, Franklin, for
9 adding that in there. I appreciate you looking at that and
10 considering that.

11 I think from a grower point of view, just have a
12 little bit of a cautionary tale. I mean, we might not know
13 the implications today, and that's, I think, been the case
14 on some other items that farmers have accepted and put on
15 their land that were waste streams. So I know the public
16 comments alluded to several examples of that, not
17 necessarily on the compost feedstocks, but just in other
18 applications of waste.

19 But I think Franklin really draws a strong point
20 there with, I think, the problem is we have this single use
21 packaging issue. And I just want to make sure we have
22 enough farmers in the equation to balance out the whole
23 conversation here because I do realize that the circular
24 economy is trying to solve this from a farmer point of view.

25 But again, if we do find out that these materials

1 cause issues 10 years down the road, who's going to be
2 standing with the farmer that might have their family land
3 at stake? So I think we owe it to ourselves to go through
4 the process here and due diligence and consider who we're
5 identifying as the person that's going to solve this problem
6 and make sure their voices are heard in this conversation.

7 And Nate, that picture that you posted, that's a
8 real thing that we're dealing with here. And I can't
9 remember how long you said that fork was in your pile for.
10 More than 180 days, right?

11 SECRETARY LEWIS: Yeah, it definitely was longer.
12 And I want to be very clear that that is an anecdotal
13 experience. I actually do think, you know, I want to
14 acknowledge that we have heard from composters that
15 compostable things do compost. They are metabolized by the
16 organisms in the compost. So I don't want to paint a
17 picture that this is a hoax or something.

18 I just wanted to share my own experience about
19 that one particular item, which who knows where it came
20 from? I did not personally add it to my pile. So who knows
21 where it came from? And who knows if it actually was
22 compostable or certified to those ASTM standards. We don't
23 know that kind of stuff.

24 CHAIR BRUCH: We don't know that, but that was
25 kind of one point. It's hard to identify, you know, the

1 difference. And I thought it is ironic, you mentioned it as
2 anecdotal, but a public commenter mentioned a similar
3 scenario with a fork. So that was a real scenario that I
4 read through before you mentioned your experience. So
5 anyway, thank you, Nate. Appreciate it.

6 SECRETARY LEWIS: Thanks, Amy.

7 Go ahead, Allison.

8 VICE CHAIR JOHNSON: Thanks, Nate. I'm definitely
9 wrestling with these materials. So I appreciated how much
10 input has come in and appreciate you getting the TR done so
11 we have some more information from a third party that we
12 trust.

13 I just wanted to name a few categories of comments
14 that I heard this go around. Like Amy, I heard a lot of
15 farmers and organizations who represent farmers saying we
16 don't want this in our compost.

17 But that wasn't the only voice. We heard from at
18 least one farmer who said, I'm trying to keep my supply
19 chain local, and the way it works in my local community is
20 to try to transition from plastics to these compostable
21 alternatives for single use, and I do want that in my
22 compost because it's not plastic. So I thought that was a
23 really interesting perspective and made me think in a
24 slightly different way there.

25 And then I'm thinking a lot about the need. Do we

1 need this in organic agriculture? And we are hearing some
2 farmers who do need access to affordable, abundant, organic
3 compliant compost. And so if we're trying to bump up that
4 supply chain by capturing food waste and composting it, what
5 encourages consumers to make that move toward composting
6 matters.

7 Does it have to be a compostable plastic bag?
8 Maybe not. Maybe that's where the paper discussion comes
9 into play more. Could you have a paper collection bag
10 that's pretty durable? Or does that mean you're introducing
11 PFAS or something into more paper products?

12 So thinking about what the sort of pieces that
13 move through this system are and could be seems like a
14 really essential part of the discussion. And then we have
15 this much broader discussion around waste in our society and
16 how we can keep it out of landfills and move toward a more
17 closed loop system overall, and what should and shouldn't go
18 into that system.

19 So there's an awful lot swirling here, and I
20 really appreciate the process you've laid out to kind of
21 ground us in the specifics, get away from speculation, have
22 some real detailed information in the TR that can inform the
23 next step, and also really great information continuing to
24 come in from the public.

25 And I wanted to name also the presentation from a

1 professor in Michigan who kind of walked us through the
2 chemistry and the breakdown process, and from his
3 perspective the distinction in how these polymers do or do
4 not break down. So I'm going to give that a little bit more
5 attention in continuing to think through this as well.

6 But thank you all. There's a lot to wrestle with
7 and it's going to be interesting to see what the next step
8 looks like in the fall.

9 SECRETARY LEWIS: Great. Thanks, Allison.

10 Any other comments or questions from the Board?

11 (No response.)

12 SECRETARY LEWIS: All right. Well, I think just
13 in terms of next steps and what to expect, we'll be tackling
14 this in Crops using all the resources we have available to
15 us now. And as I mentioned earlier, personally I would like
16 to see us give these substances a fair shake in the National
17 List process, and in my view, that would sort of culminate
18 in a vote of some sort for addition to the National List.
19 And we'll sort of see how the fate of that at the Board
20 level, how that transpires.

21 So more to come. A lot of discussion in
22 subcommittee, and we'll revisit compostables perhaps with a
23 proposal for the fall.

24 I'll turn it back to you, Logan.

25 BOARD MEMBER PETREY: Yeah. Thanks, Nate.

1 All right. Thank you all for the discussion.
2 Okay. Got to move along. We've got 14 sunsets to get to in
3 an hour.

4 CHAIR BRUCH: Logan, and I'm going to jump in here
5 if you don't mind and just take a break if possible, and I
6 know that's going to just leave us to be very efficient in
7 the back half. But how about we take about an eight-minute
8 break, and then we can regroup and get to the remaining
9 sunsets under your leadership. So why don't we return back
10 at four past the hour, I guess, by the clock that I have.

11 (Off the record from 3:57 p.m. to 4:04 p.m)

12 CHAIR BRUCH: Hello, all. Welcome back. Thank
13 you so much. We're in our last segment for the day. And we
14 will continue on Crops.

15 I will turn it over to Logan here. Thank you,
16 Logan.

17 BOARD MEMBER PETREY: Yeah. Thank you.

18 Okay. Moving on with sunsets. Briefly, just, you
19 know, with the sunsets, we're doing listing, use, new
20 information, public comments, previous vote, group vote
21 eligible. Okay?

22 First one up is Franklin, potassium hypochlorite.

23 POTASSIUM HYPOCHLORITE

24 BOARD MEMBER QUARCOO: Okay. I'm back on my
25 computer.

1 CHAIR BRUCH: Franklin, we have an echo from you.

2 BOARD MEMBER QUARCOO: Yes. I'm back on my
3 computer. Hopefully for good this time. All right.
4 Just a second. So potassium hypochlorite.

5 Can you hear me?

6 CHAIR BRUCH: Yes, we can.

7 BOARD MEMBER QUARCOO: Okay. So it's listed under
8 205.601 as an algaecide, disinfectant, and sanitizer. It's
9 included for irrigation system cleaning systems. Chlorine
10 materials, it's listed as a chlorine material for pre-
11 harvest use, but the residual chlorine levels in the water
12 in direct crop contact or contact with the soil must not
13 exceed the maximum residual disinfectant limit under the
14 Safe Drinking Water Act. So that's that.

15 And we had a 2024 TR, limited scope TR, that
16 informed this sunset review. Potassium hypochlorite is a
17 chlorine material that is used for pre-harvest, like I
18 indicated. I'll not go into their formation and all of
19 that. When it comes to international acceptance, none of
20 our other partners -- Canada, European Union -- none of them
21 lists potassium hypochlorite specifically.

22 It has an antimicrobial mode of action, and that's
23 through oxidation and chlorination. I'll not go into some
24 of the details. It sort of functions like denaturation. It
25 just makes a protein structure of the membrane collapses,

1 and it doesn't function like it needs to do. So that is
2 when a protein is broken down -- a functional protein, where
3 it's no longer doing what it has to do -- it causes all
4 kinds of problems, and that's one of the ways this product
5 acts.

6 When it comes to environmental contamination, the
7 contamination potential is heavily dependent upon where the
8 chlorine was gotten from. We have the diaphragm cell
9 process, the mercury cell process, and the membrane cell
10 process. One thing about the diaphragm cell process, it
11 relies on the use of asbestos, which we all know is an
12 issue. The mercury cell process results in mercury
13 emissions. There is the membrane cell process, which is
14 better. It's more energy efficient, and there are no
15 harmful chemicals associated with that as compared to the
16 others. Ninety percent of the chlorine used in Japan is
17 this type.

18 So I'll talk about the regulations allow the
19 application of potassium hypochlorite, according to the NOP
20 regulation, is unlikely to result in levels that are harmful
21 to human and environmental health. Now, according to that
22 regulation, it is allowed to use rates that are consistent
23 with drinking water standards, like I said earlier on.

24 So I will move quickly and talk about a few
25 studies that were made to look at exposure of invertebrates

1 and other aquatic organisms. There are some sensitivities
2 that vary across different species that were done. So the
3 technical report that we had did a pretty good job of
4 looking at the sensitivity of some different types of fish
5 and other non-target organisms. So the TR had that.

6 Now, we had some questions. Well, first of all,
7 let's talk about alternatives to potassium hypochlorite. We
8 also have sodium and calcium can be used for the same
9 purposes.

10 There were certain comments -- the technical
11 report did indicate that when you have sodium, when you use
12 sodium, there's an issue of salination of salts. Potassium
13 doesn't do that. And in addition, potassium also is a
14 nutrient, which was also another thing that came up in the
15 comments that said, well, if it is a nutrient and it's a
16 synthetic salt, then it cannot be used because now -- so, we
17 had a number of comments. And that's -- apart from the fact
18 that we have a recent TR and also some of the comments that
19 we had, this will not be a candidate for the -- what do we
20 call it? I'm drawing a blank here.

21 BOARD MEMBER PETREY: Group vote.

22 BOARD MEMBER QUARCOO: Group vote, yes. So this
23 will not be a candidate because we had a recent TR and also
24 some of the comments that came up.

25 We had some questions for our stakeholders where

1 we asked, is the substance used in concentrations that do
2 not exceed the maximum limit spelled out? We got a comment
3 that said no, but we had -- based on the comments, there are
4 people who are passionate about this issue.

5 We also asked is there an interest in introducing
6 an annotation to ensure that only chlorine materials that
7 are produced using one of the -- the membrane cell process,
8 for example -- which is the energy efficient one and doesn't
9 release all those toxic materials. One of the comments
10 said, well, when you do that, then you create a sourcing
11 problem that it becomes extremely difficult for folks to get
12 these chlorine materials.

13 And so, there have been some interesting comments
14 that I'm still distilling, and I'm looking at them and will
15 try to update the information we have with the current
16 public comments that we are getting.

17 So it was also compared to some other products
18 and, you know, looking at it, there's different arguments
19 for and against. Like I said, potassium is a nutrient. We
20 are talking about salination of salts. This doesn't do
21 that, but then it introduces another question altogether.

22 So in brief, this is what we have on the sunset review
23 of potassium hypochlorite. Like I said, it is not a
24 candidate for a group vote because of the consent agenda
25 route because of the new TR and also the comments that have

1 come in for and against and asking for clarification on
2 certain things. So that's about all that I have for now on
3 potassium hypochlorite.

4 BOARD MEMBER PETREY: Thank you.

5 Okay. Any other questions?

6 (No response.)

7 BOARD MEMBER PETREY: All right. Thanks,
8 Franklin.

9 Moving along. Soap-based algicide with Amy.

10 SOAP-BASED ALGICIDE/DEMOSSERS

11 CHAIR BRUCH: Yeah, excellent. Thank you, Logan.

12 Today, we're going to be looking at 205.601, soap-
13 based algicide and demossers. And essentially, they're used
14 as an algicide, disinfectant, and sanitizer, including for
15 irrigation system cleaning.

16 Produce growers use soap-based materials for
17 control of algae and mold that develop in greenhouses, as
18 well as for cleaning irrigation pipes. Past two Board
19 discussions were voted on, mostly based on public comments.
20 These obviously were not removed, and our last vote had all
21 of the Board members in favor of continuing this listing.

22 In terms of public comments, there were several in
23 favor of relisting this, including one grower comment that
24 mentioned all organically accepted soap-based cleaners and
25 disinfectants used for sanitation and irrigation should be

1 retained. Other public comments noted that there was a lack
2 of viable alternatives.

3 There were a couple groups that had mentioned in
4 their public comments about the need for further annotation
5 here. And mainly, the pieces that were requesting for more
6 information in terms of an annotation was just to further
7 define what type of material was included for the soap, if
8 it was potassium or ammonium, because we actually have an
9 additional other ammonia listing. So the TR, the most
10 recent TR, did mention both forms.

11 And also, there was a request for an annotation
12 just because that TR again mentions the use in ponds, and
13 there is definitely an environmental concern if this is used
14 in a water body versus on a walkway, greenhouse surface, or
15 irrigation system. So that is what I have there in terms of
16 a discussion.

17 I think I hit the points outside of, for this one,
18 I am going to consider this part of the group vote.
19 Although we do have not 100 percent community support, I'm
20 hoping to draw out additional comments in the fall. And
21 this could be pulled off the list, obviously, but I'm
22 initially going to slate it for the list just because it was
23 unanimously voted by the past Board.

24 BOARD MEMBER PETREY: Great. Thanks, Amy.

25 Are there any questions?

1 (No response.)

2 BOARD MEMBER PETREY: Okay. Not seeing any.

3 Moving along. Ammonium carbonate, and this is my
4 material. Okay. Thank you. All right.

5 AMMONIUM CARBONATE

6 This is 205.601, synthetic substances allowed,
7 ammonium carbonate. It's at (e) as insecticides for use as
8 bait in insect traps only, no direct contact with crop or
9 soil. Ammonium carbonate is used alone or in a mixture with
10 yeast in small quantities in traps to attract insects, and
11 particularly flies. It is most common in fruit and nut
12 production.

13 Commenters stated its important role in IPM
14 strategies along with predators, parasitoids, and manure
15 management. Previous was unanimous to relist this material.
16 All commenters were in support of relisting this material.
17 I'm stating its importance of keeping flies managed. I
18 would say that this is eligible for group vote.

19 Are there any questions?

20 Yes, Brian.

21 BOARD MEMBER CALDWELL: Yeah, I just think it's
22 interesting that this is one of the materials that we talked
23 about in Handling to be added to foods, and this use says no
24 direct contact with the crop or the soil. So just sort of
25 interesting to me.

1 BOARD MEMBER PETREY: Okay. All right. Moving
2 along. Amy again with insecticidal soaps.

3 SOAPS, INSECTICIDLE

4 CHAIR BRUCH: Yes, absolutely. 205.601 and these
5 are used as insecticides including kerosides or mite
6 control. Insecticidal soaps have been allowed for use in
7 organic cropping systems since before the implementation of
8 the NOP, and they are used for control of soft-bodied
9 insects and hard-bodied insects in the larval stage on
10 organic crops.

11 A lot of the commenters mentioned the importance
12 of this substance in terms of their integrated pest
13 management systems, their IPMs, different modes of action.
14 Because there are some alternatives out there, however,
15 folks comment this one has a very special place just due to,
16 again, that IPM integration, and then various efficacies of
17 some of the other alternatives available and then modes of
18 action.

19 Going to the public commenters, this was one that
20 I really wanted to elevate. It was important for smaller
21 producers. I mean that's kind of the thing in rural
22 America. Sometimes when we need to use a substance that's
23 approved for organic use, sometimes they're not available.
24 So that is something to elevate, especially in these small
25 rural communities to just have accessibility to some of

1 these pest management tools. One commenter mentioned they
2 wanted more clarity in the listing and had concerns on off-
3 target species such as other arthropods, but they did claim
4 that this substance is a least toxic pesticide.

5 So I would, just based on prior Board votes, and
6 there was consensus there amongst the past Board, I would
7 put this on the group vote potential. But again, I want to
8 flag for public comments to please use that process to
9 inform us otherwise. So thank you.

10 BOARD MEMBER PETREY: Thanks, Amy.

11 Okay. Are there any comments on soaps?

12 Yep, Nate.

13 SECRETARY LEWIS: Yeah. I think I just want to
14 acknowledge, Franklin, and you're being an entomologist on
15 the Board, you've got me trained to look at those languages.
16 So I can just tell you're bristling with an insecticidal
17 soap that includes an acaricide. You're like, that's not an
18 insecticide. So anyway, I appreciate you training us all on
19 the proper use of terminology.

20 BOARD MEMBER QUARCOO: Yeah, I have a few other
21 conversations I need to have about some of the things we
22 still have. Yes, because we see things like insecticides
23 such as acaricide and things like that, and we would rather
24 say pesticides and then talk about insecticides and
25 acaricides. But not for today.

1 CHAIR BRUCH: Thank you for that.

2 BOARD MEMBER PETREY: Okay. Thanks, Amy.

3 Actually going to move on to Franklin. Sucrose
4 octanoate esters.

5 SUCROSE OCTANOATE ESTERS

6 BOARD MEMBER QUARCOO: Can you hear me?

7 BOARD MEMBER PETREY: Yes, sir.

8 BOARD MEMBER QUARCOO: All right. So sucrose
9 octanoate esters, these are insecticides. And this is what
10 Nate was talking about. They are insecticides -- okay,
11 let's say pesticides, including acaricides or mite control.
12 They are used for controlling soft-bodied insects and other
13 organisms.

14 When it comes to the Subcommittee review on this,
15 okay, first of all, these are manufactured from sucrose and
16 an octanoate acid ester. But the ones that we see, the
17 synthetic versions, are made using things that are analogous
18 in structure and performance to that. But the natural one
19 is sourced from plants in the nicotine family, wild
20 tomatoes, and the natural material is sourced from that.

21 It is used for, like I said, soft-bodied insects.
22 So it actually discriminates better than even -- and I'm
23 talking about the synthetic stuff -- it discriminates
24 between organisms better than some of the organic pesticides
25 just because it is a physical action that it uses instead of

1 a biochemical one, so it just goes for soft-bodied insects.
2 So it's used -- the organic -- it's used for mites, aphids,
3 white flies, and a few other things. The APA has registered
4 SOEs as a biopesticide for foliar spray in greenhouses and
5 the like.

6 Now, when it comes to international acceptance,
7 well, it's not specifically mentioned in the regulations for
8 Canada, European Economic Community. I don't see it
9 mentioned in any of the other -- Japan International, IFOAM,
10 CODEX. It's not explicitly mentioned in any of these
11 regulations.

12 When it comes to human health and environmental
13 issue, like I said, the chemical structure, the thing it
14 has, it's made up of sucrose and octanoic acid, and when
15 these break down they are biodegradable. So this actually
16 has a great profile. When it comes to impacts on non-target
17 organisms, like I said, because it has a physical action, it
18 discriminates better between organisms than even some of
19 registered organic pesticides.

20 Now, it was compared -- when it was evaluated --
21 mainly it was compared to some of the organic pesticides in
22 various ways, but I will not go into that. But, you know,
23 it did really good when it comes to having less effect on
24 non-target organisms like lacewings and other things.
25 So that, when I saw that, that was good to me.

1 I'll leave that alone and then talk a little bit
2 about the history. In 2018, the NOSB voted to delist it
3 because they couldn't find an EPA-registered material that
4 uses this. And between, I think, the spring and the fall,
5 something was registered, and so it was kept on.

6 And that takes me to a comment, just talking about
7 some of the comments that came in. While some folks said,
8 well, this thing, it's not widely used, it should not be
9 kept on there. But then it says it is used by a farmer that
10 uses it on their farm, on the pear and apple orchard, and
11 they are used to control a number of soft-bodied insects.

12 So this is another product where we have comments
13 for it and against it, and considering the TR -- which is a
14 2024 TR, information that people are still going through and
15 processing -- and the fact that we have comments on either
16 side, this is also not a good candidate for the Consent
17 Agenda Group. That's about all I have for sucrose octanoate
18 esters.

19 BOARD MEMBER PETREY: Okay. Are there any
20 questions for Franklin?

21 (No response.)

22 BOARD MEMBER PETREY: All right. I'm not seeing
23 any.

24 Franklin, great review.

25 All right. Moving along. Amy with vitamin D3.

1 VITAMIN D3

2 CHAIR BRUCH: All right. Vitamin D3, we hear
3 about it in a lot of different places, but today we are
4 going to focus in on its ability to be a rodenticide.
5 Vitamin D3 continues to be widely used by many organic
6 stakeholders in particular situations where environmental
7 factors and structures create conditions conducive to rodent
8 infestations.

9 In the past Board review, we did vote to
10 unanimously relist this, and at the last review of this,
11 there was also a wide range of public comments. The
12 community expressed its support for this material. The main
13 comments of concern really are due to its potential impact
14 on non-target species.

15 So going to public comments here, many growers and
16 producers say it's critical for pest control and organic
17 crop production. It's one of the only pest control
18 materials allowed for rodent control. Therefore, it's used
19 by a wide range of growers. And another comment was if this
20 product was removed, there'd be virtually no other way to
21 prevent pests and rodents from destroying organic crops.

22 One advocacy group recommended to delist it,
23 though that was the only comment in favor of delisting that
24 I saw. Although they claimed it was one of the safest
25 rodenticides, its potential for secondary poisoning, for

1 example, is definitely something to consider. And then
2 again, mentioning the non-target effects because right now
3 it needs to be above ground, EPA has said it needs to be in
4 bait stations, but below ground it can be used as loose
5 bait.

6 So with that, any questions?

7 Oh, and then I will also add this one to a group
8 vote, just because of its past review. But again, I am
9 staying close to public comments, and I will be reviewing
10 them before our upcoming meeting -- new ones that come in
11 for our fall meeting. Thank you.

12 BOARD MEMBER PETREY: Thanks, Amy.

13 Okay. Are there any questions.

14 (No response.)

15 BOARD MEMBER PETREY: Okay, I'm not seeing any
16 questions.

17 All right. Moving on. Next, we have aquatic
18 plant extracts. Nate Lewis.

19 AQUATIC PLANT EXTRACTS

20 SECRETARY LEWIS: Yeah, thanks. A couple of
21 things I want to bring up with aquatic plant extracts.
22 First of all, I'll just do the preliminary review. Aquatic
23 plant extracts are listed at 205.601(j) as a soil or plant
24 amendment. Aquatic plant extracts, other than hydrolyzed,
25 extraction process is limited to the use of potassium

1 hydroxide, or sodium hydroxide solvent amount is limited to
2 that amount necessary for extraction.

3 It's kind of a foundational material. It's been
4 on the list since the list started. Growers use liquid --
5 we sort of colloquially call it liquid kelp -- for a
6 potassium source, and very typically found in organic
7 systems plans. Generally, there is a collection of kelp at
8 some point, and then that's extracted using some sort of
9 alkali material to create the liquid product.

10 These types of products are allowed in all of our
11 international programs across the globe, so, like I said, a
12 very traditional method.

13 I wanted to correct an error I made yesterday in
14 our PDS section that I said aquatic plant extracts would not
15 be eligible for the group vote because they were not
16 relisted unanimously last time. I misread the voting chart
17 from 2020, so it was relisted unanimously. I still do not
18 recommend adding it to the group vote, though, because
19 there's a lot of stuff we're working on with this particular
20 material.

21 So, first and foremost, the last Board that
22 reviewed it included this in the marine materials
23 recommendation, which the program has declined to move
24 forward on, but there is a lot of concern about over-harvest
25 of kelp and making sure that there was a sustainability

1 component to that harvesting process. So I want to
2 recognize the work of previous Boards in that realm.

3 This go-around, we ordered a limited-scope TR to
4 look at some of the other elements related to this, and this
5 stems from my experience as a material reviewer in the
6 certification world. I always had a problem with the
7 annotation here that said a solvent amount used is limited
8 to that amount necessary for extraction. It was always
9 really hard to like, you know, it's everyone's best guess.
10 Well, how much do you really need? And particularly when
11 you're dealing with the alkali being a potassium hydroxide,
12 potassium is a plant nutrient that's the K in NPK, and folks
13 could be essentially adding more of the extractant and
14 getting a higher potassium level.

15 And so we really wanted to explore that. We
16 ordered a limited-scope TR that really honed in on that
17 particular topic, and the TR was illuminating in a lot of
18 ways. I think first and foremost it described -- this is a
19 broad class of materials, you know, there is no one seaweed,
20 and the types of materials, the plant nutrients, are very
21 broad-ranging.

22 So we're not trying to isolate one thing from the
23 aquatic plant and use that as the plant nutrient. This is a
24 spectrum of nutrients and a spectrum of compounds that are
25 held within the plant tissue and the algae that they are

1 extracted from. So it's not a perfect science.

2 The conclusion from the TR is related to how much
3 you actually need to extract the substance, and how do you
4 determine whether or not the extractant has gone beyond that
5 necessary for extraction. And so, anyway, the TR was really
6 helpful in acknowledging that the problem is there and it is
7 hard to wrestle with.

8 We got some really good comments back from the
9 stakeholder community on whether or not we should pursue an
10 annotation parallel track. I was compelled by comments
11 submitted by an MRO, Material Review Organization, that it's
12 really hard to determine whether or not someone
13 intentionally added an extractant to increase the amount of
14 the plant nutrient.

15 And so one of the suggestions was that we just
16 prohibit the use of potassium hydroxide as an extractant and
17 allow the other hydroxyl groups like sodium and calcium
18 hydroxide. Right now, it's limited to just potassium and
19 sodium.

20 Anyway, I think it's worth exploring at the
21 subcommittee level what the impacts would be to the industry
22 if we restricted it to only sodium hydroxide, for example,
23 and then remove that. We would essentially then be able to
24 remove the limitation because you aren't going to add more
25 sodium hydroxide than you need to because it wouldn't be

1 something that would be beneficial. So anyway, really want
2 to explore that, and I think there is a potential for an
3 annotation change parallel motion to come before the Board
4 at the fall meeting on that.

5 I think that I also wanted to note in the same
6 comment from the MRO that the other part of this thing
7 that's always bugged me is the parenthetical. So aquatic
8 plant extracts, parenthetical, other than hydrolyzed, was
9 always a mind boggler there because when you extract
10 something with a sodium hydroxide, you get a hydrolyzed
11 substance, so it's always been confusing.

12 And they did some digging into the transcripts in
13 this comment, and their assertion is that it was actually a
14 transcription error that sort of set the stage for this
15 rulemaking to begin with, and we've rubber stamped it all
16 these years and all these sunsets.

17 So anyway, suffice it to say I think it's worth
18 digging in more on the whole annotation and whether or not
19 it's serving us, and whether or not it's beneficial and
20 enforceable and all those things, and I look forward to
21 engaging with the Subcommittee on the potential for a
22 parallel motion on this particular topic.

23 BOARD MEMBER PETREY: All right. Thanks, Nate.

24 Does anybody have any questions for Nate?

25 Amy, did you have your hand up?

1 CHAIR BRUCH: Oh, yeah. Just a quick one. Nate,
2 thanks for unpackaging that a little bit. I think it will
3 be helpful when this limited scope TR is available to the
4 public to kind of really follow exactly some of the points
5 that you highlighted, so hopefully that will be available
6 soon. Thank you.

7 Thanks, Logan.

8 BOARD MEMBER PETREY: All right. Okay. Moving
9 on. Lignin sulfonate.

10 LIGNIN SULFONATE

11 BOARD MEMBER PETREY: Okay. This material is at
12 205.601(j) as a crop or soil amendment, chelating agent, and
13 dust suppressant. Lignin sulfonate binds to the dust or
14 very small particles in fertilizer is making these materials
15 easier to handle and to apply. Dust materials can cause
16 significant foliar damage to crops. Also, they can cause
17 some inhalation or cause some irritation when handling these
18 products.

19 Larger particles are denser and spread more
20 evenly, so when the lignin sulfonate binds to the dust, it
21 does make it to where it's actually able to spread, which is
22 important when you're trying to apply a fertilizer and you
23 want an appropriate rate, or you want to make sure that
24 you're applying the right amount because you don't want to
25 have any runoff or leaching. Lignin sulfonate also acts as

1 a chelating agent which binds to micronutrients and slowly
2 releases nutrients such as boron, manganese, and iron.

3 Other uses are floating, as for a floating agent
4 in the post-harvest handling of pears, but it was removed
5 from this listing in 2014 due to the lack of essentiality.
6 There were no comments on opposing the delisting of that, so
7 indicating that it was not being used. Dust suppressants
8 are very important in reducing dust inhalation, air
9 pollution, and surface water contamination.

10 The previous Board voting was unanimous on the
11 list. Most written comments were in favor of relisting this
12 material, but there was an opposing comment stating that it
13 was a byproduct of paper pulping, which is the third largest
14 industrial polluter in the U.S. But the TR does state that
15 removing lignins to produce value-added products like dust
16 suppressants may reduce pollution and may be actually
17 beneficial.

18 The commenter also stated that there are non-
19 synthetic alternatives such as magnesium chloride and
20 naturally-occurring chelating agents that would be your
21 organic matter, so no-till management practices should be
22 used to help with the chelation.

23 They also mentioned that management practices such
24 as windbreaks, vegetative cover, mulch, and water sprinkling
25 would help, but this is more for a use that says you would

1 be applying it directly to the soil to prevent the soil from
2 being a dust, and so it's preventing soil becoming a
3 dusting, and that's not the petition use.

4 The petition use is to actually add it into a
5 fertilizer that is so small, and the small particles become
6 dust. And so, in the TR, it addresses that and says the use
7 rates in fertilizer are much lower than you would be
8 applying it directly on the soil. Again, the previous Board
9 voted unanimously to keep it on, and so I am considering
10 this for a group vote.

11 Are there any questions?

12 (No response.)

13 BOARD MEMBER PETREY: Okay. All right. Thank
14 you.

15 Moving on. Next, we have fatty alcohols. Brian.

16 FATTY ALCOHOLS (C6, C8, C10, and/or C12)

17 BOARD MEMBER CALDWELL: Thank you, Logan.

18 Fatty alcohols are listed at 205.601(k) as plant
19 growth regulators. And the use of fatty alcohols is very
20 limited. It's just for sucker control in organic tobacco
21 production.

22 And I don't think I've gotten all their comments
23 yet on this, but the one that really stuck out to me was
24 that one of the certifiers said that almost 50 percent of
25 their tobacco growers use this product, which is kind of a

1 double-edged comment because that means that over 50 percent
2 don't use it, and questions maybe its essentiality.

3 Basically, it saves labor and increases yield.
4 I'm not a tobacco person, but I think it would also make
5 harvest more efficient. And I was disappointed to see that
6 the manufacturing process of these fatty alcohols could have
7 the potential for excluded methods, which I didn't realize
8 before this round here, so that's kind of a question in my
9 mind. On the other hand, they biodegrade rapidly. They
10 have low environmental impact, very low human health impact.

11 An alternative would be the hand application of
12 mineral oil to remove suckers, and I just can imagine that's
13 just way more expensive than -- what they do is they spray
14 it coarsely to the top of the plant and it drips down the
15 plant, and it inhibits all the suckers that would normally
16 come up in the leaf axils, but doing that by hand with
17 mineral oil seems really expensive to me.

18 I put out the question about whether maybe some of
19 the approved organic burndown herbicides might have the same
20 effect, and we didn't get any responses to that. And
21 reading it over, I realized that, of course, none of our
22 organic approved herbicides are labeled for that use, and so
23 the growers really can't legally try it out. And so there
24 could be maybe research on that, but we can't expect the
25 growers to really come up with the answer on that one.

1 So all in all, I think that there's a need for
2 more discussion and more farmer feedback on this, so I don't
3 think it's a candidate for a group vote.

4 BOARD MEMBER PETREY: Okay. Thank you, Brian.

5 Anybody have any questions for Brian?

6 (No response.)

7 Okay. Thank you. All right. Moving on. We have
8 sodium silicate, Nate. This was Mindee's, and Nate took
9 over.

10 SODIUM SILICATE

11 SECRETARY LEWIS: Yeah, great, thanks.

12 So sodium silicate is listed at 205.601(1) as a
13 floating agent in post-harvest handling for tree fruit and
14 fiber processing. So sodium silicate is also known as water
15 glass. It's a soluble form of glass, which is kind of
16 fascinating to me just in itself, but its primary use is as
17 a flotation agent for pear packers. So pears sink, apples
18 float, you need to change the specific gravity of water in
19 order for the pear to float and go through your processing
20 line.

21 So what we heard back from pear packers is that
22 many of them have transitioned to larger processing lines
23 that do not have a water flume aspect to them, but the
24 smaller pear packers -- smaller and medium-sized pear
25 packers -- do still have this type of technology and still

1 use sodium silicate as a pear float. So it does seem to
2 remain necessary for pear production.

3 We did not receive comments, and again, I want to
4 acknowledge the timing of comments hasn't been exhaustively
5 reviewed, but I did not see comments submitted related to
6 its use as fiber processing, either pro or against. So I
7 think there's a little bit of consideration to put into
8 place there for whether or not that allowed use is still
9 warranted.

10 But in any event, it was unanimously relisted last
11 time, and barring any additional new information related to
12 its lack of necessity in fiber processing, I would suggest
13 that it's a candidate for the group vote in the fall.

14 BOARD MEMBER PETREY: Are there any questions for
15 Nate?

16 (No response.)

17 BOARD MEMBER PETREY: Okay. Thanks, Nate.

18 Next, we have EPA List 4 inerts. Brian.

19 EPA LIST 4 INERTS

20 BOARD MEMBER CALDWELL: Okay. This is one of my
21 favorite subjects. This has been an issue of much
22 discussion over many years in the organic community and in
23 the NOSB. And kind of an example of that, of the comments
24 that I was able to sort through, basically there were three
25 in favor of delisting it and two in favor of relisting.

1 So the background here, first of all, inerts can
2 actually comprise the majority of a spray product, and in
3 some cases up to 99 percent of the product that a farmer
4 will buy to put in their sprayer will be inerts. I mean,
5 that's extreme, but that does happen. And unfortunately,
6 sometimes the inerts are more toxic than the active
7 ingredient.

8 So from having said that, we know that they're
9 sort of not really inert. That's a misnomer, and we all
10 understand that they're called that, but they're not really
11 just bystanders in the whole situation. And the issue here
12 -- the main issue that precipitated all the discussion --
13 was that EPA List 4, which is the designated list that these
14 inerts can be taken from, is no longer maintained by the
15 EPA, and it's been supplanted by other lists.

16 So as I said, there's been discussion over this,
17 and it went back and forth over many years. And last year,
18 the Crop Subcommittee, and under Nate Lewis's guidance,
19 really took the bull by the horns. And at the urging of the
20 NOP, he and a bunch of us put together a proposal which was
21 passed, and it a recommendation now to the NOP for
22 rulemaking. And that will get rid of EPA List 4, one way or
23 another, and we will be in a better space than we are now.

24 However, we're still in the rulemaking process,
25 and in the meantime, we really -- in my opinion -- if we

1 delist this, there's an excellent chance that manufacturers
2 of all the organic pesticides that are in common use will
3 not be able to use inerts in their formulations, at least
4 synthetic inerts. And so that would really impact the
5 availability of organic pest control products severely.

6 And so my strong recommendation is that, in the
7 meantime, we relist this at 205.601(m)(1), EPA List 4
8 inerts, even though we know that that's not the ideal
9 situation. But we have the pieces in place to replace it,
10 so I'm confident that that will happen. And so in the
11 meantime, this gives us the bridge that we need to not
12 disrupt organic crop production seriously if all these
13 pesticides and pest control products disappeared.

14 So, clearly, I would say it's not for a group
15 vote, and we will have plenty of discussion on this, and
16 there may well be all kinds of discussion right now. So I'm
17 totally open to any questions, and I think Nate Lewis would
18 help out if needed as well.

19 Kyla?

20 BOARD MEMBER SMITH: Yeah, I don't have a
21 question, more of a comment. But, in my recollection of the
22 previous work on inerts, is that there was really such an
23 urgent timing element to that, knowing that this was coming
24 up for sunset.

25 And I think like the goal -- and again, I know

1 rulemaking takes time and all the things, so I agree with
2 the relisting -- but I think the goal is to finish the
3 rulemaking process prior to the relisting of inerts. So
4 hopefully the regulatory and rulemaking gods will be with
5 us, and if not, I think this is a nice backstop and bridge,
6 as you said, to get us where we want to be.

7 BOARD MEMBER CALDWELL: Yeah. Thanks, Kyla. I
8 totally agree, and that was one reason that we pushed it
9 through last fall for a vote, and we approved it. But yeah,
10 we can't depend 100 percent that the new rulemaking will
11 have happened before 2026, or 2027 on this, so I appreciate
12 your support that this is a bridge strategy.

13 Allison?

14 VICE CHAIR JOHNSON: Thanks, Brian, for the
15 overview, and for you and the whole subcommittee's work on
16 this.

17 I'm trying to game out the scenarios and the
18 timing, kind of like Kyla was, and I'm wondering -- this
19 might be an Erin question -- but so if the NOP goes ahead
20 with rulemaking based on the inerts recommendation from the
21 fall, at some point does it become a problem to still have
22 this listing in place?

23 Like could they finalize the new rule if we
24 haven't pulled this old inerts listing off? And then the
25 flip side, I guess, could delisting -- removing this current

1 line item for inerts -- kind of force the other rulemaking
2 to move along a little bit faster?

3 BOARD MEMBER CALDWELL: Yeah, that's a great
4 question. I think -- and Nate may comment on this -- but I
5 think we had put in the language that the recommendation
6 that we made was to replace the existing rule, which does
7 specify EPA List 4. So it would just be the same continued
8 situation that we have right now, you know, to replace it,
9 so I don't think there'd be a barrier by passing this to
10 implement the new rule.

11 So Nate, tell me if I'm right about that.

12 SECRETARY LEWIS: Yeah, I think that was my
13 understanding as well is that the recommendation we passed
14 in the fall gave a set of options to replace the List 4, so
15 the rulemaking action would put a new system in place in
16 lieu of, and remove the List 4 reference. But I'll maybe
17 defer to the Program to confirm that.

18 Got a thumbs up from the side of Jared, so --

19 MR. CLARK: Yeah, you got it.

20 BOARD MEMBER CALDWELL: Great. Yeah, and Nate,
21 you probably have maybe a few other words.

22 SECRETARY LEWIS: Yeah. Well, I think that, yeah,
23 it's great to keep bringing this up, and I think you're
24 absolutely right, we should not include this in the group
25 vote. But I think that I was just going to tie it back to

1 our it's used in the micro-encapsulated formulas, and I
2 think this would be a good -- I think that particular
3 petition substance would be a good exercise in the impact of
4 our fall recommendation on what could or could not be used
5 in those particular kairomone formulas.

6 Because I think, just when I did a quick little
7 look, I think the items that -- anyway, I think we just
8 should look at what's allowed as an inert substance in Pear
9 Ester now because of the List 4 listing versus what might be
10 allowed in the various options that we presented to the
11 program in the fall in that recommendation. So just a good
12 exercise in evaluating impacts.

13 BOARD MEMBER CALDWELL: Okay. Logan, I'm going to
14 turn it back over to you. Thank you.

15 BOARD MEMBER PETREY: Thank you, Brian.

16 Okay. Thank you all for the discussion.

17 All right. I think this will be the last one for
18 today that we're going to get to. We're going to put on 602
19 materials for tomorrow morning. Those should be quick
20 materials. So Corie and Amanda, you'll get to think it over
21 tonight.

22 All right. I actually have paper as our next
23 material.

24 PAPER

25 BOARD MEMBER PETREY: Okay. Thank you. All

1 right, 205.601, synthetic substances. This is production
2 aids. So 601(o), paper-based crop planting aids as defined
3 in 205.2, virgin or recycled paper without glossy paper or
4 colored inks.

5 So Wood Turner was actually the author of this,
6 and I took it on, and it's got a lot in it. Paper has a
7 long history. It's been on since OFPA, and it was for
8 newspaper and recycled paper. And then there was a petition
9 in 2018 to add use as a production aid, paper-based crop
10 planting aids, and it did pass. We had a TR in 2019, and so
11 we did not recommend a new TR because we had relatively good
12 information.

13 So the use of paper-based crop production and
14 planting aids, again, is defined at 205.2, and this material
15 has to be comprised of at least 60 percent cellulose-based
16 fiber by weight. This is pots, seed tapes, and collars,
17 that are placed in or on the soil and later incorporated.
18 This excludes a biodegradable mulch film.

19 Up to 40 percent of the ingredients can be non-
20 synthetic or other permitted synthetic ingredients in
21 205.601, or synthetic strengthened fibers, adhesives, or
22 resins that contains no less than 80 percent bio-based
23 content as verified by a qualified third-party assessment.

24 So its uses, again, are allows for mechanical
25 transplanting, or it can be put in by hand. It seems to be

1 that smaller growers benefit from this material more. The
2 collars are used to prevent cutworm damage for young
3 transplants, and there also can be -- I think it's cloches.
4 I don't use them, but I think they're coverings to protect
5 the newly transplanted crop.

6 So the manufacture of these, it comes from wood,
7 tree, straw, hemp, bamboo, reeds. Cellulose sources are
8 typically mechanically ground and then chemically cooked
9 using an alkali or sulfite process. Newspaper and recycled
10 papers can also have a variety of inks, although colored ink
11 and gloss paper are not allowed.

12 In 2019, the TR did not find any evidence of
13 harmful effects to human health. A difference between this
14 paper and the previously-approved newspaper is that we are
15 not restricting it to the use of only recycled paper
16 products. The annotation allows a virgin stock of cellulose
17 to be used in paper as a planting aid in organic
18 agriculture.

19 There were comments. The public comments were
20 mostly in favor of keeping this, saying that they were
21 essential and they were very important to producers, mainly
22 for small producers. OMRI did have -- or one commenter did
23 have a concern and did have discussion in its comments going
24 over the materials used, and just because of the advances in
25 paper production.

1 We did have one opposing comment just talking
2 about the paper being used, and the synthetic materials that
3 might be in some of the newspapers, especially this is a hot
4 topic also because we have the compostables and the compost
5 discussion at hand. Some of our questions were answered by
6 one commenter asking about the PFAS, asking are they aware
7 of any concerns for the PFAS that might be in paper pots?
8 And it's saying that PFAS is usually used for adhesives for
9 it to be transparent, and that would actually not be used in
10 paper pots, that's not a necessary thing. So some of the
11 plastics that need to be transparent are using PFAS.

12 And then also we asked whether the continual use
13 of these materials for paper pots would cause a buildup, but
14 the comment stated that people used newspaper for mulch, and
15 that would be an incredible amount of tonnage, and so there
16 wasn't a bad effect there.

17 Okay. So we only have a couple minutes. I want
18 to open that up to any suggestions or any comments. This
19 would not be for a group vote.

20 Yes, Brian.

21 BOARD MEMBER CALDWELL: Just wanted to say that
22 this really brings up the issue that we should do a full-
23 blown review of paper products, I think.

24 BOARD MEMBER PETREY: It is too complex to really
25 wrap up in one sunset, I agree.

1 Yes, Nate.

2 SECRETARY LEWIS: Yeah, I think I didn't quite
3 understand the concern about using paper pots repeatedly in
4 a single area and the buildup, but then you mentioned
5 something about newspaper. I just want to -- if there was
6 any additional anecdotes.

7 BOARD MEMBER PETREY: Yeah, so reading the
8 documents from USDA website, let's see, the materials are
9 approved for mulching and compost feedstock. The level is
10 much higher than the intensive use of the paper pots. So
11 one reference speaks of two to five tons and indicating that
12 there was not an issue of buildup. It would seem that using
13 paper pots would not raise any concerns to the buildup.
14 That's the -- I'll send you that, too.

15 Amy. You're on mute.

16 CHAIR BRUCH: Sorry. I saw that reference too.
17 There was one paper pot manufacturer that said maybe a
18 lettuce grower using this eight times in one season would
19 only accumulate 32 kilograms of potential material versus
20 like paper used for compost feedstock could be like two to
21 five tons, so just really minuscule is what the comment was.

22 BOARD MEMBER PETREY: Yeah, thanks Amy. That's
23 exactly right, the numbers.

24 CHAIR BRUCH: No problem. Tag team there.
25 Yeah, this one is -- there's a lot to this for sure, and I

1 think there's -- I think an attestment to maybe unpackage
2 this even further than, like you mentioned, in a sunset.

3 CHAIR BRUCH: All right folks. We covered a lot of
4 ground here today. I really appreciate the Board
5 deliberation on all of these materials. As Logan mentioned,
6 to be continued on Crops for our 205.602 substances. We
7 have two of those. And then we will continue on with our
8 final day of our 2025 spring meeting here with NOSB, and we
9 have continued subcommittee work, so we'll be hearing from
10 Livestock, Materials, CACS, and then doing closing
11 discussions with the Board. So, thank you so much for
12 joining in and see you tomorrow. Appreciate it.

13

14 (Whereupon, at 5:01 p.m., the virtual hearing in the above-
15 entitled matter was adjourned until Thursday, May 1, 2025.)

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1 CERTIFICATION

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3 This is to certify that the attached proceeding before the:

4 NATIONAL ORGANIC STANDARDS BOARD

5 IN THE MATTER OF: SPRING 2025 NOSB BUSINESS MEETING Day 2

6 PLACE: Zoom for Government

7 DATE: April 30, 2025

8
9 was held according to the record, and that this is the
10 original, complete true and accurate transcript which has
11 been compared to t *Elaine M. LaRosee* plished at the hearing.
1213
14 Elaine M. LaRosee, CDLR15 Official Reporter
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In The Matter Of:
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
SPRING 2025 BUSINESS MEETING DAY 3

Vol. 3
May 1, 2025



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UNITED STATES DEPARTMENT OF AGRICULTURE
NATIONAL ORGANIC STANDARDS PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)
SPRING 2025 BUSINESS MEETING

DAY 3

Thursday,

May 1, 2025

Held via Zoom for Government

National Organic Standards Board (NOSB) Members

Amy Bruch, NOSB Chair

Allison Johnson, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Kathryn Deschenes

Carolyn Dimitri

Amanda Felder

Andrea Hatziyannis

Cat McCluskey

Dilip Nandwani

Logan Petrey

Corie Pierce

Franklin Quarcoo

Kyla Smith

Javier Zamora (absent)

National Organic Program Staff, Standards Division

Erin Healy, Division Director

Jared Clark, Assistant Division Director

Andrea Holm, Agricultural Marketing Specialist

Heather Kumar, NOSB Food Technologist

Michelle Arsenault, NOSB Advisory Committee Specialist

Johanna Mirenda, Agricultural Marketing Specialist

Devon Pattillo, Agricultural Marketing Specialist

Jason Edmonson, Agricultural Economist

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P R O C E E D I N G S

(Time: 12:00 p.m.)

CHAIR BRUCH: Welcome. We are cruising along here with our Spring 2025 National Organic Standards Board meeting. We are in our third and final day. We have a jam-packed day, and I'm really looking forward to all of the discussions that we're going to be having, just an overview of the agenda.

We're going to pick up the 205-602 sunsets with Crops. We have two more in Crops to do, and then we will be turning it over to the Livestock Subcommittee materials, and then Compliance and Accreditation. And then we will round out this meeting with any deferred votes. We'll preview the upcoming work agenda and materials update, other business, and closing remarks.

What an incredible Day 2. It was just such great conversation and exchange, and I really appreciate the vetting and the heavy lifting that we do in the review process for the sunsets that we saw in Handling and Crops, and appreciate the community support and feedback with the public comments. That's just a tremendous partnership there.

Without further ado, I am going to do one quick icebreaker just to get us warmed up here, and then we'll turn it over to Logan and our two new members to tackle

1 their 602 sunsets. So this icebreaker, I'm going to ask you
2 guys about potential organic marketing slogans. We heard
3 there is just a high note about the expansion. We're a \$70
4 billion industry, so how can we get to that \$100 billion
5 mark? So let me know any organic marketing concepts or
6 slogans we've heard in public comments. We appeal to a wide
7 variety of people now, which is incredible. So I'd like to
8 either hear some marketing thoughts or crops that need to be
9 elevated. Yesterday, we had a great talk about aronia
10 berries.

11 So any other crops that we need to elevate, that
12 can be done in this piece, this icebreaker as well. I'm
13 going to go to Andrea first. Thank you, Andrea.

14 BD. MEM. HAZIYANNIS: Sure. My favorite marketing
15 slogan for USDA Organic is that USDA Organic is always non-
16 GMO. There's a lot of claims that go on packaging that's
17 very confusing, and organic is very clear, and I love that
18 about it.

19 CHAIR BRUCH: I love a clear message that's easy
20 to digest. Thank you, Andrea. Allison, we'll turn it over
21 to you next.

22 VICE CHAIR JOHNSON: Well, easy to digest, I was
23 going to say lentils. Yeah, I'm still looking for the
24 organic cover crop burger. I'm definitely not a marketer,
25 so someone will have to name it for me, but my favorite

1 organic burger is no longer available, so there's a real
2 opportunity for a whole grain and legume mixed burger out
3 there for our organic, vegetarian, and anyone fans.

4 CHAIR BRUCH: Excellent. Yes, all product
5 categories should be having innovation. I love it. Thank
6 you, Allison.

7 I'm going to go to Carolyn, because I did indicate
8 that you're going to be pulled in for all of these
9 icebreakers. So go ahead, Carolyn.

10 BD. MEM. DIMITRI: I'm using my phone, so I'm not
11 very skilled at using my phone in Zoom. Do you hear the
12 noise of New York City, everyone? How about: eat organic
13 food, you won't regret it. I'm a terrible slogan person, so
14 I'll leave it to the marketing people. But I do think you
15 won't regret it if you eat it.

16 CHAIR BRUCH: Excellent. Thank you,
17 Carolyn. Nice job multitasking. I think you're doing well
18 on your phone here. I'm going to go to Logan to round us
19 out in this icebreaker section, and then pass it back to you
20 for crops. But go ahead, Logan.

21 BD. MEM. PETREY: Carolyn, I really like that one.
22 It's catchy. But yeah, I think just with -- every time I
23 pull up an Internet Explorer or something, it seems like
24 it's just something about the food dyes or things that are
25 going to be regulated. And I think being able to market

1 alongside of that would be easy and something we take
2 advantage of. And so that seems to be what the natural
3 flavorings or dyes or anything like that. I think we've
4 already are ahead in the game on that.

5 CHAIR BRUCH: Good, relevant point there. I
6 actually might jump in here, too. I was unpackaging one of
7 my son's treats the other day. Maybe I already mentioned
8 this earlier on in our conversations, but there was an
9 insert in it. It had a quote from Vogue magazine, which I
10 thought was interesting. But it said, sorghum is the new
11 quinoa. And listening to what Bob Whitney had said about
12 sorghum, the opportunities there, it's an incredible
13 crop. We can grow it in the Midwest. It can help our crop
14 rotations out. And it's a superfood. So just wanted to
15 elevate that crop for anybody interested in innovation.
16 Love to partner up with you on that.

17 Okay. Now, Logan --

18 VICE CHAIR JOHNSON: Amy, I think you have a
19 couple more willing sloganeers with their hands up.

20 CHAIR BRUCH: Oh, I love this. Voluntary
21 icebreaker participation, cool. Okay, Kyla, Brian, and then
22 Nate. Go ahead, Kyla.

23 BD. MEM. SMITH: Mine's quick. I have two pre-
24 teen girls, so mine would be "Organic, duh."

25 CHAIR BRUCH: Thank you. I'm glad we included

1 that.

2 BD. MEM. PETREY: I think that works for a three-
3 year-old, too.

4 CHAIR BRUCH: Yes, again, very, very succinct,
5 digestible message there. Thank you, Kyla. Brian, go
6 ahead.

7 BD. MEM. CALDWELL: Yeah, mine's a little
8 longer. Don't panic. It's organic.

9 CHAIR BRUCH: That's good, Brian. I love
10 it. Thank you. I mean, I guess we do have the federal
11 transcriptionist recording these, because these are
12 priceless. Okay, go ahead, Nate.

13 SECRETARY LEWIS: Mine's a little nerdy, as you
14 would expect. Organic chickens don't eat bugs yet.
15 Hopefully, we get bugs allowed for feed in organic poultry
16 production.

17 CHAIR BRUCH: Excellent. Relevant. Definitely
18 integrating public comments in that slogan there. So thank
19 you so much.

20 Any other folks that want to join in here?
21 Otherwise, I'm glad we were able to hear all of those.
22 Those were priceless. Again, Logan, I'm going to turn it
23 over to you for the final leg of crops.

24 BD. MEM. PETREY: Thank you. Okay. Thank you,
25 Crops, yesterday for great discussions and getting through

1 that. Even with delays and everything that we have, we were
2 able to knock it out, but we've got two more. These are in
3 the 205.602. So these are prohibited non-synthetic
4 substances and we actually have our new members are going to
5 be covering these. So next slide, please.

6 Okay. First up is Corie with arsenic.

7 BD. MEM. PIERCE: All right, thank you. So yes, I
8 have arsenic 205.602. So this substance has been listed as
9 a prohibited substance and unanimously relisted every time
10 it's come up. It's a toxic material to humans and the
11 environment. It's naturally occurring and can enter the
12 water supply, the food supply, air naturally.

13 The arsenic levels in the environment are
14 generally low, but vary depending on where you are in your
15 given area. And yeah, all commenters support the relisting
16 of arsenic as a prohibited substance. And I would even say
17 that this one could be a candidate for the group vote in the
18 fall because it's non-controversial, toxic.

19 Quick thing, I just thought it was interesting, my
20 own curiosity about arsenic in rice. And I just happened to
21 hear the other day in the car and heard a story on our local
22 NPR station about the rising levels in rice in Southeast
23 Asia, and just based on increasing temperatures and more
24 flooding and things like that. So I didn't get to hear the
25 whole thing, but just curious about that as a sidebar. Any

1 questions?

2 BD. MEM. PETREY: Awesome job, Corie. Seamless
3 and excellent.

4 Okay. Group vote. All right. Oh, Amy has one.

5 CHAIR BRUCH: Yeah. No, just a comment. Corie,
6 nicely done. Good debut on the sunsets. Thank you so much.
7 And love that you pulled in some really relevant current
8 information as well, just to kind of be able to absorb
9 that. So thank you so much, Corie.

10 BD. MEM. PETREY: Okay. Next up, please. Next
11 up, please. All right, 205.602, strychnine. Is that how we
12 pronounce it?

13 BD. MEM. FELDER: Strychnine.

14 BD. MEM. PETREY: Strychnine. Thank you.

15 BD. MEM. FELDER: Yeah, you got it. So strychnine
16 is listed on 205.602(i) as a prohibited substance in crop
17 production. It is a highly toxic, fast-acting neurotoxin.
18 It is currently only approved in the U.S. for in-ground,
19 low-ground bait for pocket gophers. It has high risks for
20 secondary poisoning. This was unanimously relisted last
21 cycle and every cycle before.

22 Public comment, this was one of two substances
23 with arsenic that was actually elevated to be part of the
24 voting efficiency as one of those not questionable, should
25 be relisted. No one said otherwise.

1 BD. MEM. PETREY: Great. And we would consider
2 this as a group vote. Awesome. Okay. Well, crops is done.
3 Thank you, Amanda. Awesome job.

4 CHAIR BRUCH: Thank you, Logan. Really appreciate
5 that, Amanda.

6 BD. MEM. PETREY: Nate, did you have a question
7 about material?

8 SECRETARY LEWIS: No, I just wanted to report that
9 I think we have about eight substances in crops that could
10 be in a group vote for the fall. So just to keep folks up
11 to date.

12 BD. MEM. PETREY: Thank you. I figured crops is
13 going to have a few more materials than handling. Okay,
14 excellent.

15 CHAIR BRUCH: Thank you, Logan. Sorry for that
16 interruption. And Nate, good update there. Really
17 appreciate, Logan, again, your leadership, chairing
18 crops. It's been wonderful to have you a part of the team
19 and have you definitely demonstrate your organizational
20 skills and punctuality. So thank you. You did amazing
21 yesterday and continue on today.

22 Brian, we're going to kick it over to you for the
23 Livestock Subcommittee. Thank you, Brian.

24 BD. MEM. CALDWELL: Well, Amy, thank you. And I'd
25 like to make a few remarks before we get into the meat of

1 the program here, but about the Livestock Subcommittee and
2 some of our work. We still, on the Livestock Subcommittee,
3 would benefit from more experienced members. And so for the
4 NOP and our stakeholders next time, this time around,
5 nominating folks to be on the board, we'd really appreciate
6 some vets or farmers with livestock-like operations. Or
7 two, maybe one or two of those would be great.

8 On the current board, Nate Lewis definitely has
9 the widest experience, in my opinion. And I have some
10 experience. We had a seed flock for several years, but
11 Nate's the guy. So Nate, please chime in and keep me on
12 track if I stray a little bit here.

13 But we've received a petition to clarify the use
14 of chlorine materials, basically for livestock drinking
15 water, but it brought up a lot of questions. And we are
16 requesting an unlimited TR to help inform that. And so
17 hopefully that process will all come through.

18 And I wanted to just say a few words about animal
19 welfare, because a bunch of our materials today are --
20 revolve around that and are central to that. It is super
21 important to our consumers, along with the issue of safety
22 in terms of not having residues and that sort of thing, or
23 dangerous residues. And I think that some of the other
24 labels, maybe the consumers don't realize how careful the
25 organic program is about what we allow to be used and I

1 think that's important. We have just a few tools for pain
2 management with our livestock. We don't want to discourage
3 farmers from using them, which would be one of the possible
4 outcomes if items are delisted. A farmer might get into a
5 marginal situation. Should I use something or not? Not use
6 it, but then the animal suffers. So we want to really give
7 the farmers a good toolkit. And then their vets a good
8 toolkit to use.

9 Finally, just a couple of words about if we delist
10 materials, the alternative then is if an animal is in the
11 situation that needs it, is to use a non-listed material and
12 then pull the animal and/or the milk from the herd or the
13 flock, dump or sell the animal on the conventional
14 market. So just keeping those things in mind, I think when
15 we discuss these issues with materials and pain management
16 and consumers.

17 So with that said, that's enough. We'll start
18 with a proposal to change the annotation on iodine. So
19 Nate, please go ahead.

20 SECRETARY LEWIS: Great, Brian. Really appreciate
21 your leadership in livestock. And I'm really happy to be
22 engaged in the subcommittee.

23 So we are taking a look at iodine and an
24 annotation change for the second time. So just as some
25 context, iodine's sunset review was last year. And last

1 year was the first time we were trialing a parallel motion
2 annotation change approach where we did the sunset review,
3 and in this parallel track, we were considering an
4 annotation change. As part of that, for iodine
5 specifically, we really honed in on the issue of iodophor
6 complexers that are used in iodine formulations, and in
7 particular, nonylphenol ethoxylates. So I will refer to
8 those substances as NPEs from now on. So I don't need to
9 keep saying nonylphenol ethoxylates.

10 When we brought up the concept of this, we did a
11 couple of things. We reached out to stakeholders through
12 our spring-fall process for sunset review. We also ordered
13 a limited scope TR on iodine teet dips in particular, and
14 what the impact NPEs are on those types of formulas.

15 So we got a lot of great feedback. We heard last
16 spring that we should consider a motion that prohibits the
17 broad class of alkylphenol ethoxylates. So I'm going to
18 bring us all back to our college organic chemistry days
19 that, depending on how many carbons you've got in your
20 chain, nonylphenol would be nine carbons. Octylphenol would
21 be eight carbons. So these are very similar types of
22 substances with very similar characteristics, but they are
23 distinct because of their chemical formula.

24 So in the spring, we heard that we should consider
25 prohibiting the broad class of these substances, alkylphenol

1 ethoxylates, and that's the proposal we brought to the fall
2 meeting. Simultaneously, we did a review of this technical
3 report. The technical report confirmed what our sort of
4 working knowledge was of these substances, that NPEs in
5 particular are used in iodine teet dips. NPEs are extremely
6 toxic and persistent, particularly to aquatic organisms, and
7 we have a direct vector to aquatic systems on a dairy farm
8 when a teet dip is used, it's washed off, it goes into the
9 manure lagoon, and that water is spread on, the manure
10 slurry is spread on the field.

11 So really, it's a direct line from the use of
12 these substances to the environment, and so it makes a lot
13 of sense for organic to be kind of ahead of the curve and
14 prohibiting these substances.

15 We also learned a few other really interesting
16 things. We learned that the industry on this particular
17 issue is kind of already ahead of the organic regulation,
18 and many dairy producers already use teet dips without NPEs
19 as a complexer, as part of a requirement of their milk
20 shipper, and the cooperative that they're part of. That's
21 helpful context for us to understand how easy it is for
22 iodine teet dip manufacturers to reformulate, and we also
23 learned about the certification process.

24 So when we proposed a prohibition on the broad
25 class of alkylphenol ethoxylates in the fall, we heard back

1 from certifiers that they were unaccustomed to doing that
2 review. They know what a nonylphenol ethoxylate looks like,
3 but they're maybe not so sure or trained up on how to
4 evaluate formulations for the broad class of substances.

5 So at the fall meeting, we decided to send it back
6 to subcommittee for further consideration. The motion and
7 the proposal we have before us is to prohibit only the
8 nonylphenol ethoxylates, not the broad category of those
9 substances, and we proposed that for a couple of reasons.
10 First, in terms of -- we really heard from certifiers who
11 are the ones doing most of the review here. I want to note
12 that OMRI does list some iodine teet dips, but none of them
13 contain nonylphenol ethoxylates, and I also want to point
14 out that many livestock materials do not get registered with
15 OMRI, WSDA, or another material review organization. They
16 are very oftentimes only allowed within the context of a
17 particular producer's system plan. So really sensitive to
18 the enforcement angle of any sort of annotation that we
19 would propose.

20 We also learned that there really don't seem to be
21 any iodine teet dips on the market that include an
22 alkylphenol ethoxylate that's not nonylphenol ethoxylate.
23 So the prohibition of this one substance appears to capture
24 the universe of formulations. My research showed one patent
25 that listed octylphenol ethoxylate as an alternative

1 formulation, but we do have some real-world information from
2 the producers whose company required them to go to a non-
3 nonylphenol ethoxylate formulation that these manufacturers
4 reformulated, and they didn't choose an octylphenol
5 ethoxylate, they choose to reformulate with something
6 completely different.

7 And so this is all against the backdrop of the
8 industry phasing out from NPEs altogether. So NPEs have
9 some benefits, but the toxic nature is a burden too heavy,
10 apparently, for the manufacturers to carry anymore, and so
11 the industry's already moving to phase these substances out
12 of production altogether. We're just trying to remain ahead
13 of the curve.

14 And just reiterating, we proposed prohibiting the
15 broader class of substances in the fall. We're scaling it
16 back a little bit to just nonylphenol ethoxylates based on
17 the comments and feedback we heard from certifiers, in
18 particular, around just the challenge of evaluating these
19 substances and determining whether or not a product
20 contained that substance.

21 I'll note in public comments for this meeting, we
22 heard certifiers who looked at all the formulas and none of
23 them, again, I might be repeating myself, none of them
24 contained an alkylphenol ethoxylate other than NPEs. So it
25 does appear like we're capturing most, if not all, of the

1 formulations with this prohibition, and we're doing it in a
2 way that's familiar and enforceable by certifiers who are
3 really the ones on the ground doing that system plan by
4 system plan review of particular formulations.

5 So I think with that, we'll try to untangle the
6 web of APES and NPES and formulations, and I'm happy to
7 answer questions or start hosting a conversation. And
8 Brian, do you want to facilitate the queue or keep it with
9 the lead, or how do you want to do it?

10 BD. MEM. CALDWELL: Sure, yeah, no, I'll do that,
11 that sounds great. So any questions for Nate? Thanks,
12 Nate, excellent, excellent presentation.

13 And then, oh, Allison, go ahead.

14 VICE CHAIR JOHNSON: Thanks, Brian, thanks, Nate.
15 Nate, I think you already answered this, but I just want to
16 reiterate and reinforce. So we got a number of comments
17 that were asking us to go back to the fall version of the
18 annotation with the APES and the NPES listed. It sounds
19 like based on the research that you've done, there are no
20 non-NPE, APES currently in use in these teet dips, so we're
21 capturing the whole universe of what's actually being used
22 with this annotation.

23 And then I think you addressed my other question,
24 which was, if we pull NPES, is everyone going to switch to a
25 different APE, or are we pushing the industry in the

1 direction of the unknown? And it sounds like in the
2 reformulation that has happened to date, at least, that has
3 not been the case. Did you get any feedback about what that
4 alternative that was used in place of NPEs looks like, or
5 any risks associated with that?

6 SECRETARY LEWIS: They tend to be proprietary
7 formulas that, I'm harking back to my certification days,
8 and it was like pulling teeth to get the formulations in the
9 first place from a lot of these folks. So we did not --
10 that information was not divulged to us, like what is the
11 new complexer? It was just confirmed that they weren't
12 replacing it with another alkylphenol ethoxylate, they were
13 replacing it with something else, which we may need to look
14 at more, and that's why we would do the sunset reviews, but
15 focusing on the NPE issue specifically, it does not appear
16 that they're reformulating with octylphenol, or decylphenol,
17 or some of the more APEs, so yeah.

18 VICE CHAIR JOHNSON: Okay, and I suppose we do
19 have the option if down the line it becomes clear that there
20 is another compound that's an issue, we could revisit the
21 sanitation and add to it, or there are other ways to deal
22 with it if something else pops up as a problem. I really
23 appreciate your thoroughness and pre-answering all my
24 questions, so I think I feel good about where we landed.

25 SECRETARY LEWIS: Well, I appreciate that, and I

1 think just iodine test dips in general just require extra
2 scrutiny because of that direct vector to the aquatic
3 environment that surrounds dairy farms. We just want to do
4 our best to make sure that that -- iodine test dips are
5 critical, and we have to keep them available for producers,
6 and we want to minimize the impact they have on the
7 environment as they get washed off and spread around.

8 BD. MEM. CALDWELL: Great, thanks Allison. Kyla?

9 BD. MEM. SMITH: Yeah, I think in that last
10 exchange my comments were pretty well covered. I don't have
11 any questions, I just was going to reiterate that this will
12 be an important thing for future boards to keep apprised of
13 in their sunset review, and for certifiers, I don't know if
14 we want to just sort of flag this as an ongoing question or
15 something like that, or -- so that certifiers don't need to
16 be, and MROs don't need to be remembering to be reporting on
17 this type of information, but I guess it would just be like,
18 you know, a flag out to the community that if we are -- if
19 they are starting to see these things, like the board
20 certainly would want to know about that, so that we can
21 capture that in a future annotation, and so again, just for
22 future livestock committees, maybe just have this being an
23 ongoing question, thanks.

24 SECRETARY LEWIS: Yeah, Brian, if I may, just want
25 to add one more note on this, that I just want to

1 acknowledge the stakeholder community for really bringing
2 this forward. I think, you know, just my personal
3 experience in the certification world, I knew this was an
4 ongoing issue, but as we were trialing the annotation
5 parallel track process last year, and hopefully continue to
6 do that for subsequent sunset review rounds, we looked to
7 the organic community for where we should start and this was
8 one of the suggestions from commenters to really hone in on
9 this, and so we took that seriously and are finding our path
10 to consensus here, which I feel like we've achieved, but I
11 just wanted to acknowledge that this really came -- this
12 effort came from the organic community and their comments
13 related to annotations that we're taking seriously and
14 applying here, so.

15 BD. MEM. CALDWELL: Great, yeah, Nate, it's
16 wonderful to be resolving some of these annotation issues,
17 it's great. Any other questions for Nate? Okay, then Amy,
18 should I do the vote or do you do the vote?

19 CHAIR BRUCH: I'll just jump in here, Brian, I
20 really appreciate you facilitating this. We will -- if I
21 don't see any more discussion, though, we will move to a
22 vote, and this one, as Nate mentioned, is already on the
23 national list, so we do not have a classification
24 motion. We will just -- we would just have the motion on
25 the national list for an amendment, so motion to amend

1 Iodine at 205.603(a)(16) and 205.603(b)(4) to say iodine
2 must be produced without the use of non-phenyl ethoxylates,
3 as best as I could.

4 SECRETARY LEWIS: You got it.

5 CHAIR BRUCH: Okay, this was motioned by Nate
6 Lewis and seconded by Brian, and we are going to start the
7 voting with Andrea.

8 BD. MEM. HATZIYANNIS: Yes.

9 CHAIR BRUCH: Allison?

10 VICE CHAIR JOHNSON: Yes.

11 CHAIR BRUCH: Nate.

12 SECRETARY LEWIS: Yes.

13 CHAIR BRUCH: Cat.

14 BD. MEM. MCCLUSKEY: Yes.

15 CHAIR BRUCH: Dilip.

16 BD. MEM. NANDWANI: Yes.

17 CHAIR BRUCH: Logan?

18 BD. MEM. PETREY: Yes.

19 CHAIR BRUCH: Corie.

20 BD. MEM. PIERCE: Yes.

21 CHAIR BRUCH: Franklin.

22 BD. MEM. QUARCOO: Yes.

23 CHAIR BRUCH: Kyla.

24 BD. MEM. SMITH: Yes.

25 CHAIR BRUCH: Javier. Absent. Brian.

1 BD. MEM. CALDWELL: Yes.

2 CHAIR BRUCH: Kathryn.

3 BD. MEM. DESCHENES: Yes.

4 CHAIR BRUCH: Carolyn.

5 MS. ARSENAULT: Amy, I'll just note, Carolyn had
6 to step away for a few minutes, so we'll mark her absent.

7 CHAIR BRUCH: Thank you, Michelle. Amanda.

8 BD. MEM. FELDER: Yes.

9 CHAIR BRUCH: And the Chair votes yes.

10 SECRETARY LEWIS: 13 yes, zero no, two absent, the
11 motion carries. Thank you all.

12 BD. MEM. CALDWELL: Great, well Amy, should I
13 resume?

14 CHAIR BRUCH: Yes, Brian, go ahead, thank you.

15 BD. MEM. CALDWELL: All right, good work,
16 everyone. I think we need another -- a new slide, but the
17 next material is butorphanol, Sunset Review, and Corie will
18 take that one.

19 BD. MEM. PIERCE: All right. Great, so
20 butorphanol is a 205.603(a) substance, and it's used as a
21 preoperative treatment in pain management before surgery
22 for, in an emergency context, for livestock. And it belongs
23 in the class of drugs known as opiate agonists, and other
24 drugs that are in this class include buprenorphine,
25 fentanyl, meperidine, and morphine. Because it's a

1 narcotic, federal law restricts the use of this drug by or,
2 excuse me, needed to be used by or -- either administered by
3 or with a written or oral order of a vet. It's also -- it's
4 used in food animals, it's got extra label use with
5 withdrawal periods for meat of 42 days and discarding milk
6 of eight days.

7 And there are -- so this is, excuse, well, one
8 second. It's also used in conjunction with xylazine, which
9 is more of a sedative, because butorphanol is more of a pain
10 med. There are some other pain killing meds, but this one
11 is definitely preferred by farmers, because it has less
12 adverse effects on the animals. This is, as Brian mentioned
13 at the beginning of this session, this -- I'm learning more
14 and more about how this is part of one of -- this is one of
15 those meds that is a few in our, in farmers' toolkits for
16 really helping to manage pain in animals. And it seems to
17 be used pretty infrequently, but it is a critical tool in
18 toolkit for farmers in these situations.

19 Let's see. Some of our stakeholders brought up
20 that they're -- we just want to be able to have a discussion
21 about and consider the residues that could be in the meat
22 and the milk, and I think Brian's going to help talk about
23 some more of the details on that in a minute. And we also
24 had a lot of -- several stakeholders supporting the
25 relisting of butorphanol, again, as a critical tool for

1 farmers to use for animal welfare.

2 Just as a note, I myself raise cattle and we have
3 never used this, and I've talked to a few other farmers that
4 I know, and I'd like to hear from more, but just in the few
5 that I've talked to, this is very rarely used, but also is
6 important -- you know, it's noted that it is important in
7 those extreme cases.

8 Let's see. Although this was unanimously relisted
9 last go-around, I do think that it has been a while for TR.
10 I don't think this is a candidate for the group vote. Okay,
11 I think that's all I've got. Any questions?

12 BD. MEM. CALDWELL: All right, questions for
13 Corie? Thank you, Corie. Not an easy one, but a good one.
14 I'm not seeing anybody.

15 I do have a few thoughts. I'm definitely not an
16 expert on this, and so once again, Nate or perhaps Kyla or
17 somebody might want to chime in and make sure I'm on track,
18 but I was looking at how the withdrawal periods are
19 determined, and they -- first, the medical community, the
20 veterinary community determines a maximum residue limit for
21 the drug, which are set so that an average adult person
22 could eat a serving with that much in it every day for the
23 rest of their life, and according to research, it would have
24 no effect. And the withdrawal periods are set to attain
25 that level, that maximum residue level.

1 And so then the other aspects of it are that when
2 a drug is administered to an animal and it moves through the
3 animal, of course, the amount of drug that's administered is
4 diluted by the mass of the tissues of the animal, so that
5 the concentration of the drug in the meat or milk is already
6 low, and then what happens is that over time, residues in
7 the meat and milk products decline, and so that's this
8 period of time that is set for the withdrawal period based
9 on the maximum residue limit.

10 And we double that, and that's important because
11 if, for instance, the concentration of the drug -- in a meat
12 or milk product is 1/10th after the withdrawal period of
13 what it would have been right away, so it's diminished by a
14 factor of 10, when you double that time period, it will be
15 diminished by a factor of 100. So it's an exponential type
16 of function there, it operates that way.

17 And so, again, I'm not an expert on this by any
18 means, but, and we certainly, I think, would benefit from a
19 TR that our real experts look closely at withdrawal periods
20 and possible variances from what I just outlined, that sort
21 of thing. But I just wanted to kind of put that out there,
22 and I guess, Nate, I would love to hear just a quick
23 response just to make sure that I'm on track with that.

24 SECRETARY LEWIS: Yeah, well, I was imagining what
25 those studies are like, is there's some poor human has to

1 eat these meals throughout their life. I was fascinated by
2 what that study looks like, but --

3 BD. MEM. CALDWELL: Well, I'm going to bet that
4 it's extrapolated from mice, but yeah, go ahead, so.

5 SECRETARY LEWIS: Yeah, I think there's a -- I
6 love that we're having these conversations about withdrawal
7 times. I mean, because if you look at the National List and
8 we'll see it in some substances that I'll be reviewing, I
9 think coming right up, we're all over the map in terms of
10 our -- how we annotate livestock drugs for withdrawal
11 times.

12 And we typically follow this two times approach
13 where we say, all right, FDA says it's safe at this number
14 of days, well, let's be extra sure and like extra, extra
15 sure by doubling that to meet that consumer expectation.
16 But that when -- so in this case, we have the actual numbers
17 of days listed as in the annotation, which, you know, I
18 would assume the meat withdrawal period of 42 days was based
19 on -- it used to be 21 days and we've doubled it to 42. But
20 if you look now, butorphanol, I believe, has a withholding
21 time for meat of eight days. So now we're more than twice
22 as far, and so maybe that's a good thing.

23 But then if you look at Clinexin, which we'll get
24 into next, it just says double the amount of time. So that's
25 good if the number of days gets longer, but maybe is less

1 assuring to consumers if the number of withdrawal times from
2 FDA gets smaller.

3 So yeah, I think doing a kind of comprehensive
4 review so that we're taking a look at these as a group makes
5 a lot of sense. I think getting the expert information
6 there would be really helpful, and dare I say, potentially
7 an expert panel to talk about all of these things. maybe
8 with all this time we've saved with our Sunset Group posts,
9 we'll see.

10 So yeah, hopefully that's enough to respond now
11 and then we'll get into it a little bit more when we're up
12 to Clinexin.

13 BD. MEM. CALDWELL: Thanks so much, Nate. And
14 yeah, this really exemplifies how careful we try to be with
15 all this. So Kyla, go ahead.

16 BD. MEM. SMITH: Yeah, I just was going to add one
17 piece and I don't know what's preferred really. And so this
18 could be interesting to sort of put out to the community,
19 but I would imagine that for certifiers, for reviewers and
20 inspectors, having the specific days in there is probably
21 easier than having it say twice the whatever and then you've
22 got to go find the current thing. It's just like one
23 additional step.

24 That said, you know, if we want to be strictly
25 following the twice the whatever, obviously this is not kept

1 pace with industry, which again, I don't know, maybe it's a
2 good thing or maybe we don't care. So anyway, I just wanted
3 to sort of offer that, that like having the specificity in
4 the invitation is probably easier.

5 BD. MEM. CALDWELL: All right. Other comments
6 about that -- about this topic? Okay, well, thank you,
7 Corie. I think we can move along and we're going to go to
8 Nate talking about flunixin.

9 SECRETARY LEWIS: All right, well, flunixin is
10 listed at 205.603(a)(12) as a disinfectant sanitizer and
11 medical treatment is applicable. Flunixin is a really
12 powerful anti-inflammatory that's used for respiratory
13 issues and mastitis in cattle primarily. It's marketed
14 under the brand name Banamine, so that might be something
15 that people are familiar with.

16 Interesting about this substance, so EPA does have
17 a report on the occurrence of SAIDs, so those are aspirin
18 and ibuprofen in water, and flunixin is one of those and it
19 does not appear to show up, so it's unclear whether it -- it
20 doesn't have much residual effect or it's just used so
21 infrequently that it didn't show up in that, but they did
22 note that it's not a sort of environmental contamination
23 concern like some of these other livestock drugs are.

24 And, you know, again, these are, you know, they
25 kind of reinforce Corie's point, which is that these

1 substances are rarely used, but when they are, they're
2 incredibly valuable for animal welfare perspective. So
3 organic livestock producers do a good job of keeping their
4 animals healthy. These tools we, hope we never have to use,
5 but when we do, it's good to have them in our toolbox so
6 that we can relieve pain and suffering and not have movement
7 from the organic industry or the organic market out to the
8 conventional market as the only option for these producers.

9 Flunixin, as I mentioned, has annotation related
10 to withdrawal period, so it needs to be two times that as
11 required by FDA, and, you know, I think it just sort of
12 reinforces the need to have this conversation and evaluate
13 the pros and cons of a fixed number of days, and, you know,
14 I completely hear you, Kyla, that that is -- totally makes a
15 lot of sense from a certifier perspective, a lot easier to,
16 you know, to enforce as opposed to needing to do the
17 research, and then I also know that FDA moves those days
18 from time to time depending on your research.

19 And so, you know, it -- I guess all I'm saying is
20 it cuts both ways, and I think it's important to evaluate
21 the pros and cons. And, you know, perhaps out of this
22 conversation, it might make sense to keep an inconsistent
23 approach that maybe some substances pose a more significant
24 residue issue from our perspective, and we want to keep it
25 fixed at a higher number, and others, we're more comfortable

1 with it -- with a two times approach as it adjusts to new
2 research.

3 So I think flunixin was unanimously relisted at
4 its last sunset review, and I think outside of a larger
5 conversation around withdrawal times, I would recommend that
6 this one be added to a group vote. So, you know, I sort of
7 look forward to our subcommittee work over the summer and
8 how we want to tackle withdrawal times. If we -- I think if
9 we want to open that up as a topic of conversation for the
10 fall, I would probably not include this in a group vote, but
11 talk about it individually, but let's sort of stay tuned.
12 I'll sort of say it's eligible for now, but, you know,
13 likely to come off to have a larger conversation about
14 withdrawal times.

15 BD. MEM. CALDWELL: Okay, any questions about
16 flunixin? Corie, go ahead.

17 BD. MEM. PIERCE: Yeah, thanks. Just on that,
18 Nate, would you kind of recommend the same thing for
19 butorphanol then, in terms of the potential eligibility on
20 the group vote, or do you feel like that needs a separate,
21 you know, I guess we can discuss what would go into the TR,
22 but --

23 SECRETARY LEWIS: Yeah, I mean, I think the one
24 distinction I would make between flunixin and butorphanol is
25 that it appears as though the withdrawal time for

1 butorphanol has changed since the annotation was first set
2 up. So to me, that would be like -- I would see that as new
3 information that brings into question, you know, whether or
4 not we need to evaluate that. Yeah, okay. Yeah, so,
5 anyway, we're all sort of feeling this out, so that's why
6 I'm like, I don't know. It sort of meets the eligibility
7 requirements, but then also I really am excited about the
8 conversation around withdrawal time. So I certainly don't
9 want to stifle that in the name of some vote efficiency.

10 BD. MEM. CALDWELL: Okay. Any other questions
11 about flunixin? All right, well, thanks, Nate. And we will
12 stay with Nate, and we'll talk about magnesium hydroxide.

13 SECRETARY LEWIS: Okay, magnesium hydroxide is
14 allowed at 205.603(a)(18). This product is used for short-
15 term relief of constipation in cattle. You know, again,
16 it's used in extreme situations. It's only under the lawful
17 order of a licensed veterinarian in full compliance with
18 MDUCA.

19 Interestingly, it does not have a withdrawal time.
20 I don't particularly know exactly why it does. Maybe it's
21 just because there is no withdrawal time that FDA
22 recommends, and so you double zero and you still get zero.
23 But I think that's worth maybe taking another look at for
24 the fall about withdrawal times. But in general, you know,
25 other than that, it has been a unanimously relisted

1 material. It's an important tool in the toolbox for
2 livestock producers in relieving pain and suffering in their
3 animals. And, you know, barring any information related to
4 withdrawal time that might need to be brought up, I would
5 recommend that this substance be added to the group vote for
6 the fall meeting.

7 BD. MEM. CALDWELL: Okay. Questions for Nate
8 about magnesium hydroxide. I don't see any, so thanks,
9 Nate.

10 And we can move along to oxytocin, which I will
11 take. And so oxytocin is a natural hormone, but we are
12 approving a synthetic version of it under 205.603. And it's
13 used basically to treat birthing problems, and usually it's
14 for a prolapsed uterus. And it was delisted -- it was
15 recommended to be delisted by the NOSB in 2017, but that was
16 not implemented by the NOP.

17 And basically what the situation was that some
18 producers and vets made the strong case that, again,
19 prolapsed uterus isn't common, but we really need something
20 to be able to handle that. On the other hand, some of the
21 buyers, milk buyers in particular, do not allow their
22 producers to use oxytocin, and they want to make the label
23 claim of hormone-free. And there's a lot of value in the
24 marketplace with that.

25 And so there are other ways of treating prolapsed

1 uterus, which are not, maybe as expeditious, it takes more
2 care and time, but it can be treated, or animals can be
3 taken out of the herd. So there's questions about how
4 necessary this is. And in fact, from the comments that I
5 was able to look through, we had two in favor of delisting
6 it, one for relisting it, and two that kind of were up in
7 the air and kind of put both sides out.

8 So -- but everybody seemed to agree that this is a
9 prime candidate for annotation change. And the annotation
10 that's currently on there is a little bit ambiguous, and it
11 needs to have wording in it that says it can be used only
12 within three days of birth. And that would really tighten
13 things up for use of this material. So that -- oh, and I
14 don't think it's a candidate for a group vote, because there
15 are questions about it.

16 So with that, I think I'll open up for questions.
17 Dilip?

18 BD. MEM. NANDWANI: Thanks, Brian, for your
19 leadership and knowledge. Definitely appreciate that. Very
20 quick, did you read any comment about alternatives, or do
21 you have any idea of the organic or non-synthetic
22 alternatives available in the market?

23 BD. MEM. CALDWELL: Yeah, thanks, Dilip. The
24 alternative that was cited several times was basically to
25 bathe the whole part of the animal, which is hard, in warm

1 water, and then there was an herbal treatment, and then, of
2 course, just push the uterus back in. With our -- when we
3 had sheep, if there was a ewe that had a prolapsed uterus,
4 that was considered to be basically something we didn't want
5 to encourage in our breeding program, so those were animals
6 were always culled, but, you know, eventually. But that is
7 the alternative that I saw in several of the comments, so
8 thanks, Dilip.

9 BD. MEM. NANDWANI: Thanks, Brian.

10 BD. MEM. CALDWELL: Kyla, go ahead.

11 BD. MEM. SMITH: Yes, my question, maybe -- sorry
12 if I wasn't listening closely enough, but with the
13 consideration for a proposed annotation that you had
14 indicated about the within three days or whatever, would
15 that -- that would address the comments made around some
16 lack of clarity around its use for milk let down, so that's
17 the intention around that three-day annotation specificity,
18 correct?

19 BD. MEM. CALDWELL: Yeah, and it would -- I think
20 that there's actually maybe some producers who feel like
21 maybe it would increase milk production, so we don't want it
22 to be used on any kind of routine basis.

23 BD. MEM. SMITH: Right.

24 BD. MEM. CALDWALL: To make that very clear, so
25 yeah.

1 BD. MEM. SMITH: Okay, and then do you -- I know
2 that, obviously, the livestock subcommittee hasn't had an
3 opportunity to discuss this, but do you think it likely that
4 there would be a proposal for the fall with this annotation
5 change?

6 BD. MEM. CALDWELL: Yeah, it seems pretty
7 reasonable to me, and again, sometimes, Kyla, you and many
8 of the other members of the board are clearer on our
9 procedures than I am, but yeah, that would be the goal, so
10 yes, thanks.

11 BD. MEM. SMITH: Great. Well, you got Nate Lewis
12 with an annotation change under his belt, so you have a good
13 person to help tackle this.

14 BD. MEM. CALDWELL: All right, thanks, Kyla.
15 Allison, go ahead.

16 VICE CHAIR JOHNSON: Thanks, Brian. Yeah, I take
17 very seriously when the board actually votes a material off
18 the list. I have a hard time going in a different direction
19 than that, and when the NOP says no to one of our
20 recommendations, we can sort of say, yeah, we're going to
21 keep doing the same thing, stand on principle, or we can
22 kind of try to find another way through. So I think the
23 annotation suggestion is likely that way through. It really
24 gets at the concern, which is overuse, or sort of
25 surreptitious reliance on this material for milk production

1 rather than treating a medical condition, which is what the
2 intention of the current listing is.

3 So it does seem like there are a narrow set of
4 cases where it is essential, or at least very important, and
5 that having a really tight annotation would get close to the
6 board's original intent in voting it off the list, but also
7 sort of recognize the reality of what happened when it was
8 put forward for rulemaking. So I agree with Kyla, it'd be
9 great to see it in the annotation come forward in the fall.

10 BD. MEM. CALDWELL: Great, thanks, Allison. Yeah,
11 that's really, it's good to clarify all this and make the
12 issues stand out clearly, so I appreciate that. Any other
13 questions or comments on oxytocin?

14 Okay, well, we will move to poloxalene, and that
15 is Logan's -- one of Logan's materials.

16 BD. MEM. FELDER: All right, can you hear me fine?

17 CHAIR BRUCH: Yes.

18 BD. MEM. FELDER: Okay, so this is, this was Kim's
19 material. I am new to livestock. I've never had any
20 livestock, so learning a lot on this subcommittee. Of
21 course, that's what you do in your fifth year, is you just
22 keep on learning and taking it in, so I'm excited to be on
23 this, and animals, very different, you've got to keep those
24 things alive continuously. It's like a perennial, I just
25 don't deal with that. I get to terminate at the end of the

1 year if I mess up.

2 So this has been an interesting mindset. Okay, so
3 this material, like I said, this was written by Kim, so I
4 have to give her credit for it, but it is listed 205.603(a),
5 disinfectant sanitizer medical treatments as applicable. So
6 this is actually only for the emergency treatment of bloat,
7 and I'm sure we all kind of know what bloat is, but for
8 ruminants, it's just a lot of gas, so it's a serious -- it
9 can be a serious condition by the accumulation of excessive
10 gas in the ruminant, which can lead to life-threatening
11 situations. Most common causes are -- or it is caused by
12 the rapid fermentation of high-protein feeds and in
13 pastures, and I think that happens a lot when you have the
14 legumes, immature legume fields, and after this discussion,
15 please, livestock people, correct me on that if that's
16 wrong.

17 And so I'm not sure if this tends to happens
18 regionally in certain areas, or if this just is a district
19 management in certain farms. But -- so the Livestock Health
20 Subcommittee received a limited scope TR on the
21 manufacturing process. Poloxalene is synthesized as a -- I
22 should know, ethylene, I have that material all the time,
23 polyethylene bloat copolymer. The manufacturing process
24 involves the polymerization of ethylene oxide and propylene
25 oxide to create a copolymer.

1 This structure allows polyethylene to act as a
2 surfactant, reducing the surface tension of the gas bubbles.
3 It destabilizes the foam and allows gas to release from the
4 ruminant. It is not manufactured, produced, extracted from
5 a natural source. It is a synthetic compound.

6 The previous board voted zero in opposition of
7 relisting this material. 13 supported the relist, but there
8 was one abstention. The summary of the comments, for the
9 spring, we had two opposing the relisting and we had five
10 supporting. The opposing comments listed that this was not
11 compatible with organic systems. It was more of like a --
12 it kind of enabled probably some poor pasture management and
13 it was one of the -- because it is an emergency use, it
14 enables lack of pasture management and animal husbandry. So
15 and that's contrary to organic sustainable agriculture.

16 Another commenter said, given the existence of
17 preventative measures and more compatible treatments for
18 bloat in organic animals, NOSB should not relist this
19 material. However, supporting comments did say this meets
20 the criteria for OFPA. It does not appear to have harmful
21 human or environmental effects. It's necessary for organic
22 production. There are no viable alternatives and it's
23 consistent with organic livestock production.

24 One certifier mentioned that it had 13 members
25 using it and it was using, of course, strictly for

1 prevention. That even though all measures can be taken to
2 prevent it, emergencies do happen. One commenter suggested
3 to limit treatments per animal per year if used as -- since
4 used as an emergency to try and create, make sure that the
5 producer is maintaining good pasture practices.

6 Are there any questions or discussions?

7 BD. MEM. CALDWELL: Thanks, Logan. Any questions
8 about poloxalene? I don't see any. So I believe, Logan,
9 you also have formic acid, which is next.

10 BD. MEM. PETREY: And because there is an
11 abstention, I would not put that for a group vote, the
12 poloxalene. I think that that would not make it eligible.
13 Okay? Moving on.

14 SECRETARY LEWIS: I'll note if it changes your
15 mind, an abstention does not change whether it's a unanimous
16 vote or not, so. I still put it up to you.

17 BD. MEM. PETREY: Okay, thanks. Okay, moving
18 on. Formic acid, again, at 205.605. This is via topical
19 treatment, external parasitized. I'm struggling
20 today. That poor transcriptionist.

21 UNIDENTIFIED SPEAKER: Yeah, that the piece
22 (indiscernible).

23 BD. MEM. PETREY: Thank you. Or a local
24 anesthetic as applicable. And it's for use solely within
25 honeybee hives. So the formic acid is employed to control

1 mites in honeybee hives. It is put into a pad, a compressed
2 pad, and then put into the hive, and it volatilizes to kill
3 the mites without harming the bees.

4 There is kind of a PHI, or a post-harvest interval
5 with the application. You're not to harvest honey from the
6 hive for two weeks after the introduction of the formic acid
7 pads. The formic acid kills mites by asphyxiation, but
8 again, does not affect the bees. It's primarily produced
9 through the hydrolysis of methyl formate.

10 The commoners were fully in support of this
11 material, saying that we need to protect bees because
12 there's a lot of things attacking them, and this is one of
13 the important materials used. It was a unanimous vote on
14 the previous board, and I would recommend this as a group
15 vote.

16 BD. MEM. CALDWELL: Great. Thank you, Logan. Any
17 questions about formic acid. I don't see any. I'm going to
18 make just a quick comment that supposedly this has been the
19 worst year ever for bee mortality over the winter. And so,
20 Varroa mites are certainly a major contributor to that, and
21 again, we need a good toolbox for organic production of
22 honey. We also need standards for organic production of
23 honey, but that's another question.

24 CHAIR BRUCH: That actually was a comment. Yeah,
25 we did see that commented by some groups in the public

1 comments, so yes, sir.

2 BD. MEM. CALDWELL: All right. Thank you,
3 Logan. Keeping on with bees, Franklin. Sucrose octanoate
4 esters.

5 BD. MEM. QUARCOO: All right. Can you hear me?

6 BD. MEM. CALDWELL: Yes, we can.

7 BD. MEM. QUARCOO: All right. So we did talk
8 about sucrose octanoate esters yesterday, so I'll skip over
9 a lot of the stuff that we talked about. This is listed as a
10 topical treatment for external, as an external parasiticide,
11 or local anesthetic as applicable.

12 Mainly, the use is for the management of Varroa
13 mites, as we just discussed. So I will not go over all of
14 that information. International acceptance, not listed in
15 any of the groups or partners in their regulations, I mean.
16 We had a TR, and the 2024 TR did not list any natural
17 alternatives to sucrose octanoate esters for use in the
18 management of Varroa mites in honeybees.

19 I will now -- I want to focus on some of the
20 comments that we got. Apart from the fact that it was
21 originally both the crops and the livestock, it was listed
22 to be delisted because no materials had been registered.
23 Later on, the material was registered by the EPA. It wasn't
24 delisted. So but there have been comments about the lack of
25 organic standards for honeybee production, for which reason,

1 folks are saying, if we keep it on, and there are no
2 guidelines where this is going to be used properly, where
3 they can say, okay, I use cultural methods, use all of these
4 other methods, which we are supposed to do before we go to a
5 pesticide.

6 So because of the lack of that framework, it was
7 said that, you know, just keeping it on. Another comment
8 that was there even previously was that nothing was heard
9 from beekeepers. And then there was a response that, well,
10 a number of the organic honey in the United States is
11 sourced from international sources, and those folks don't
12 attend our conferences. And so they didn't get to
13 participate in the comments.

14 Other comments were that some folks indicated they
15 were disappointed that -- well, that was the same comment
16 about the lack of comments from beekeepers, which we have
17 explained. A number of them are in other areas that don't
18 attend our meeting. A farmer organization would like to
19 encourage the NOSB and the NOP to take up adding a big
20 culture standard to the USDA organic regulation. This
21 material, SOEs, sucrose octanoate esters, along with oxalic
22 acid and formic acid, is only used in agriculture
23 production. We have to have clear standards in order to
24 know what we are doing.

25 Sorry about that. The essentiality is in

1 question. Oh, well, a farmer organization stated that
2 essentiality should be looked at before releasing it if
3 there is low use of the material by folks and not a lot of
4 people commenting about the need for it. In fact, one
5 organization cited a member who used to use the product and
6 said it was a miserable experience for the person applying
7 it, as well as the bees. And that person no longer uses it,
8 and it is formic acid and the other thing, the oxalic and
9 formic acid are actually listed as better for alternatives.

10 So the general feeling was that with the low use
11 and all of that, is there really a need to release it?
12 That's all I have for now. And I'm ready for comments and
13 discussion. Sorry for the phone call.

14 BD. MEM. CALDWELL: Questions for Franklin about
15 sucrose octanoate esters. I don't see any. Just one quick
16 comment, and that is that since this is a pretty new
17 listing, as you point out, Franklin, last time it took a
18 while before we actually got a product that used this stuff,
19 but now there is a product, and I see advertisements for it
20 all over the place, so they're pushing it. So I don't know
21 if it's efficacious, but they're pushing it. So there we
22 go. Go ahead.

23 SECRETARY LEWIS: Sorry if I missed this,
24 Franklin, and I'm just keeping track. Do you think this
25 would be eligible for a group vote in the fall, or where do

1 you? Okay, I know.

2 BD. MEM. QUARCOO: No. We have a new TR, and the
3 comments we are receiving is not exactly a ringing
4 endorsement of the product. But let me make a comment,
5 though. As a pest management person, I'm always inclined to
6 keep as many things in a toolbox as possible, but I'm
7 reading the comments and those who are using it, so I'm
8 conflicted. So this is not a candidate for that.

9 BD. MEM. CALDWELL: Okay, thank you,
10 Franklin. Any more questions or comments for Franklin on
11 SOE? All right, I think we'll move ahead to inerts, List 4,
12 once again.

13 And the EPA List 4 inerts are listed for livestock
14 under 205.603(e). And I'm not going to repeat all the
15 things that I said yesterday. I'm going to sum it up very
16 quickly and just say that we would have the same review as
17 we had in crops. And certainly my opinion is, personal
18 opinion, and it is that we should keep List 4 as an option
19 for manufacturers until it is replaced by a better listing.
20 So that's a quick one.

21 And any further comments on that? I don't see
22 any, and it is -- Nate is not a candidate for the expedited
23 voting.

24 Okay, on the same kind of level, let's move along
25 to excipients. And this is similar to the situation with

1 the inerts, listed at 205.603(f), but the big difference is,
2 it is not based on a defunct EPA list, which the pesticide
3 formulation inerts were. Excipients, materials that are
4 added to the active ingredients for veterinary treatments to
5 improve their efficacy or just to make them easier to
6 administer or whatever. They have an analogous role to the
7 inerts.

8 We have four different basic lists or procedures
9 for verifying that a given excipient is allowed under this
10 provision. And the first two are generally thought of,
11 especially in our comments as we look through them, pretty
12 well-received, well-supported by the general community as
13 setting a very high bar for safety. However, the three and
14 four procedures seem to, at least on the surface, kind of
15 open the doors for items that would, some of which might be
16 dubious under AFA criteria.

17 So this is a little bit of an analogous situation
18 to the inerts and pesticides, different slant. I've got to
19 point out that they are in very high usage and there are
20 supposedly 8,000 potential excipients that are in the
21 excipient universe. Of course, the organic veterinary
22 materials wouldn't use all of those, but there's like quite
23 a few organic treatments that are approved either by a
24 materials review organization or individual certifier
25 review. So there's a lot sort of going on in this universe

1 of materials.

2 It's very difficult, the comments point out, it's
3 very difficult for certifiers and MROs to ascertain whether
4 materials are included in one of these four approval
5 procedures. On the other hand, most are used quite
6 infrequently and in small amounts and there is a withdrawal
7 period. So those are extra safety checks with these
8 materials.

9 However, there is an exception, for instance, teet
10 dips used twice a day for a lot of a cow's life and, you
11 know, definitely you wipe it off, but there's some in the
12 milk, a little bit. So we really have to think about these
13 materials.

14 And then one of the comments said that they should
15 be treated like carriers or food additives or feed
16 supplements. And that kind of brings a whole other aspect
17 to this. So a quick summary of the comments that I was able
18 to interpret, some of which were kind of tricky, but
19 basically three were in favor of relisting and four were, or
20 three, I'm sorry, three other ones were on the fence and
21 were not in favor of either relisting or delisting, but just
22 wanted the issue to be addressed.

23 So I think my point here is that I'm totally on
24 the fence about this. I feel like much more information is
25 needed. We're going to work hard on this. I know that some

1 of our stakeholders have referred to comments they've made
2 in the past and I would just encourage our stakeholders to
3 get in touch with me if you have substantive detailed
4 comments, and I will move them forward to the subcommittee
5 about that. And Michelle has pointed out to me that if we
6 get approval for our next fall meeting soon, then the docket
7 will open up and you can post specific comments on this, on
8 that docket.

9 So basically this is a real strong request for
10 more input from the stakeholder community. And with that, I
11 think that I'll open up for other comments and questions
12 from the board.

13 Nate, go ahead.

14 SECRETARY LEWIS: Yeah, I think just another
15 factor on excipients that's worth considering is whether or
16 not it's being used in an emergency situation. I think that
17 we don't necessarily want to wait for certifiers to approve
18 a Flunixin -- for example, a Flunixin formula. I feel like
19 Flunixin should be used and that's in contrast with some,
20 like you're saying, like iodine, which gives us -- is a
21 routine disinfectant, something that we have the luxury of
22 reviewing and approving.

23 So I think figuring out some way to be nimble so
24 that just because the use pattern can be dramatically
25 different and I don't want animals to suffer because we're

1 waiting around for a review. On the other hand, I want to
2 make sure the drugs that are being used are -- meet consumer
3 expectations. So I just think that's just another factor to
4 consider in the evaluation process.

5 BD. MEM. CALDWELL: Absolutely, thanks, Nate.
6 Yeah, we don't need ambiguity and uncertainty when there's
7 an emergency situation. And I just got to say that this
8 particular topic makes me feel like I'm in need of a little
9 Flunixin. So just wanted to put that out there. But go
10 ahead, Amy.

11 CHAIR BRUCH: Yeah, Brian, I just wanted to
12 commend your efforts here to really review this substance.
13 There's definitely more than meets the eye here and the
14 framework that you and Nate really applied to inerts, I
15 think is really a good model to apply here and definitely a
16 plug for the community to try to get more involved in this
17 process because this one I think there's a need to impact
18 this a lot further. So thank you, Brian. I'm glad you're
19 shepherding this substance and I know there'll be a lively
20 discussion in the fall about this one too. So thank you.

21 BD. MEM. CALDWELL: Great, thank you, Amy. Yes,
22 indeed.

23 All right, I think that's -- unless there are more
24 comments or questions about this one.

25 Well, yes, we will put this on hold but we will be

1 working on it all summer and try to have something really
2 effective going on in the fall with it.

3 All right, the last one for our livestock
4 subcommittee is strychnine, and Franklin has that one.

5 BD. MEM. QUARCOO: Okay, so this will be
6 short. It is a non-synthetic substance that is prohibited
7 for use in organic livestock production. It's a pretty
8 nasty stuff. It's a toxic alkaloid that is generally not
9 good. It's categorized as in the EPA category one, highly
10 toxic. Not listed by any of our international partners.
11 And so I'll just keep it short and really go to -- well, the
12 discussions at the subcommittee level have always been that
13 it does not meet the OFRA criteria and all of that. This is
14 -- I'll just move on to -- we actually got some comments on
15 it that it's highly toxic, responsible for secondary
16 poisoning.

17 In fact, this is a great candidate for the consent
18 agenda list. It's a unanimous staff, comments included
19 birds and other non-target organisms secondary poisoning.
20 But from the fact that it is toxic itself, it's the
21 secondary poisoning. So it's a unanimous consensus that
22 this should remain on the list of prohibited substances.
23 That's about it.

24 BD. MEM. CALDWELL: Great, thanks, Franklin. Any
25 questions or comments for Franklin about strychnine? I

1 don't see any. So thank you all, livestock. And Amy,
2 I'm going to turn it back to you.

3 CHAIR BRUCH: Excellent. Thank you so much,
4 Brian, for leading that discussion in the livestock
5 subcommittee. That was incredible. Definitely substances
6 that are not straightforward and need, again, some
7 additional public comment on and some partnership there.
8 And I appreciate, Brian, you highlighting the importance of
9 these tools in the toolbox from an animal welfare
10 standpoint. That's really something we definitely have to
11 consider in our reviews.

12 We are up for a break. I would like to resume our
13 next segment at 10 till the hour. So 30-minute break
14 here. Grab some lunch and we will see you in 30 minutes.
15 And when we come back, I know the agenda is going to be
16 popped up here. We will continue on with subcommittee
17 reports. We have materials, subcommittee next, followed by
18 CACS and then our final segment. Thank you.

19 (Recessed at 1:21 p.m.; to reconvene at 1:50 p.m.)

20 CHAIR BRUCH: All right, everybody, welcome
21 back. We are cruising along here in our final day of our
22 NOSB June 2025 meeting. And on deck, we will be hearing
23 from the materials subcommittee. But as everybody's still
24 filtering in from lunch, let us do an icebreaker. All
25 right.

1 This one, and I will call on a few of you. I want
2 to know what the most interesting thing you've learned about
3 organic farming or organic livestock production that you'd
4 like to elevate. And I am going to call on Dilip for this
5 one. Why don't you lead us off, Dilip?

6 BD. MEM. NANDWANI: Okay, thanks, Amy. Okay, you
7 know, I'm a plant science person. I do grow vegetables,
8 fruits at my organic farm at the university. But honestly,
9 I don't know a lot about livestock. Although we do have
10 livestock scientists, like they have, you know, cattle,
11 sheep, goats, a lot of good things they are doing, but I
12 don't have any livestock. So this morning's session, and I
13 applaud Brian also, his leadership, you know, the way he
14 explained a lot of these things about different sunsets. So
15 I learned a lot about those pain medicine for the
16 livestock. I was not aware of that. So that was a learning
17 curve. So yeah, that's all, Amy, I have to say.

18 CHAIR BRUCH: All right, thank you for
19 highlighting that, Dilip. How about Kathryn? Love to hear
20 your perspective.

21 BD. MEM. DESCHENES: Sure, I think the most
22 interesting thing about organic farming that I hear in the
23 realm is just like the vast difference between geographic
24 regions and, you know, the different sizes of farms and
25 needs. I think it -- like, it makes sense, especially given

1 the vast size of our country, but I also think it creates
2 this, like, lack of one-size-fits-all tools.

3 CHAIR BRUCH: Yeah, very strong points there, and
4 that will be a good lead-in to our CACS materials when we
5 start reviewing those about one-size-fits-all. All right,
6 let's hear from -- let's see, I'm just seeing who's
7 trickling in here. Cat, you are just joining us. Thank
8 you. I don't know if you heard the icebreaker.

9 BD. MEM. MCCLUSKEY: I was here, Amy, I was
10 leaving my phone camera off. I'm not an ice -- I'm bad at
11 icebreakers. I got, you know, kind of blacklisted, I feel
12 like, after the icebreaker response yesterday that I like
13 breakfast radishes as an organic snack. Feel a little
14 attacked, no, I'm just kidding.

15 I have been learning so much as a new board
16 member, certainly drinking from a fire hose comes to
17 mind, but to your question, Amy, I learned a lot about
18 organically available cornstarch yesterday. It was not
19 something that I realized was in abundance, and I feel like
20 that's a big win for the organic community, and certainly
21 the organic corn producers, so that was a little, a tidbit
22 that I -- one of many tidbits I took away from yesterday and
23 this morning.

24 CHAIR BRUCH: Excellent, yes, I appreciate you
25 elevating that one as well. Big market opportunity, so we

1 need to hit that point as much as possible.

2 Anyway, I am going to transition out of the
3 icebreaker mode and into a very important subcommittee,
4 Materials Subcommittee that tackles really challenging
5 issues, and Franklin, I really appreciate your leadership in
6 this arena, and I'm going to turn it over to you.

7 BD. MEM. QUARCOO: All right, just a second. All
8 right. So just as a brief background, the National Organic
9 Program presents an analysis of recent priorities for
10 organic food and agriculture. It is a process that was
11 established in 2012, and it just has integrated research
12 topics that cover important things to the organic
13 industry. We have recent priorities that are listed for
14 crops, livestock, and handling, as well as some general
15 ones.

16 I'll go ahead and talk about some top priorities
17 for crops. One of the things that keeps coming up is the
18 impact of plastic use in organic crop production. There are
19 requests for side-by-side trials of approved organic
20 pesticide products against conventional issues of
21 alternatives to eliminate usage of things that introduce
22 PFAS and all of that.

23 So these are some of the top priorities, including
24 the extent economic impact and compensation mechanisms of
25 GMO contamination. And then there is also conduct of whole

1 farm ecosystem service assessments to determine economic,
2 social, environmental impact of farming system choices. So
3 I will not go into too much detail. I just want to give the
4 highlights, and then as much as possible, go to some of the
5 public comments that we received about these research
6 priorities.

7 Going into some of the ongoing research topics, we
8 have decomposition rates, effects of residue on soil
9 biology. There is the ongoing research topic of impartial
10 evaluation of microbial inoculants and other stuff, all of
11 which are in our documents. When it comes to contaminants,
12 one of the research topics is to investigate contaminated
13 inputs from non-organic sources. When it comes to systems,
14 there is interest in research on whole farm ecosystem
15 service assessments to determine the economic, social, and
16 environmental impact of farming system choices.

17 So I'm just going, trying not to get too much into
18 the weeds. Some of the top priorities that I've just
19 highlighted them, but I'll give a few details and then move
20 on to other areas. Some of them are statistics on current
21 use, acreage, and quantity of crop production plastics,
22 including mulches, drip tape, containers, row carvers, taps,
23 high tunnels, greenhouses.

24 What are the effects of breakdown products? We're
25 still talking about plastics. We have the issues of, when

1 long-term mulches are used by landscape fabric, they reduce
2 overall plastic use, but there is interest in knowing what
3 are the impact of these and are they really effective in a
4 whole range of things that folks want to know. There is
5 also efficacy comparison of inputs and practices for organic
6 production. Normally when the NOSB talks about
7 effectiveness of alternative or availability, commercial
8 availability of alternatives, we need that information. We
9 need to know how effective those alternatives are. So
10 constant research in that area so we can always find out,
11 know how effective alternatives are and the availability of
12 them is very critical.

13 PFAS is a major issue and research is also needed
14 when it comes to impact of -- the economic impact of GMO
15 contamination on organic crops. There is interest in the
16 total cost of GMO contamination on organic farms for the
17 full range of crops with GMO varieties.

18 There are questions on whether the coexistence or
19 the proximity of organic farms to GMO operations, are the
20 USDA coexistence provisions adequate? I mean, what are the
21 measures that go into a distance between them? There is a
22 question of whether pollen contamination can be considered
23 trespassing between those operations and organic
24 operations. So a lot of research topics that are here have
25 already covered plastics, so I'll not go too much into that

1 again. I mean, there's also identification of barriers and
2 development of protocols for organic nursery stock
3 production.

4 What are the barriers? Because demand far exceeds
5 supply, so there is a question of assessing phytosanitary
6 rules for shipping plants and quantifying the production and
7 demand for organic roof stock. I'll be talking about the
8 same thing with organic seeds, what are the barriers, what
9 all kinds of very interesting research topics, and the
10 economics of producing organic seeds and all of that.

11 There is also interest in a comprehensive review
12 of copper products and then alternatives. We know what
13 copper does to the environment, what are those alternatives
14 that can be used, what kind of crop varieties can be used,
15 so there is less dependence on these copper products by
16 breeding plants that are resistant to the diseases for which
17 the copper products are used.

18 I will skip some of these and maybe go to -- let
19 me cover one more thing, and then there is also nutritional
20 value of organic crops. So a lot of times in marketing,
21 some folks say organic crops are more nutritious or all
22 kinds of stuff. There is a need for actual research-based
23 information to that effect or whatever the research
24 information says. We have interest in climate change and
25 how organic farming can help prevent human contribution to

1 climate change and stuff like that.

2 Organic till and minimum tillage, how the
3 economics of it, how effective they are. So a lot of
4 interesting research topics on the crop side. I feel like I
5 may be taking too much time, so I will -- of course, I'm a
6 pest management person. We always want to know the
7 effectiveness of various methods that we are using to manage
8 pests and their economic implications or cost
9 effectiveness. There are specific pests that are invasive
10 that require additional research so folks can know how best
11 to manage them and stuff like that, including weeds,
12 diseases.

13 Now, when it comes to livestock, the top
14 priorities include elucidation of the barriers to increase
15 organic pork production and market. Also, the development
16 of balanced organic livestock rations that incorporate high
17 percentage of diverse regionally adapted grain crops so that
18 these grain crops can be farmed locally without depending
19 highly on corn and soybean. So those are the top
20 priorities.

21 Ongoing livestock research topics, ways to prevent
22 and manage parasites, natural alternatives to DL methane in
23 a system that pays for organic poultry feed programs,
24 developing data programs that address climate change,
25 alternatives to eliminate use and remediation strategies for

1 PFAS that we've talked about. I will not go into too much
2 detail here either.

3 Now, let me talk about a few interesting areas of
4 research that are under the ongoing livestock research
5 topics. Parasite immunity to chemical control and research
6 into that so that folks can know how best to manage
7 parasites and still get good results. Specific problems,
8 parasites we've mentioned that require additional work.
9 There is also evaluation of methane in the context of a
10 system approach in organic poultry production. So it is an
11 essential amino acid for poultry and there is a lot of
12 interest in conducting research in finding viable
13 alternatives to synthetic methane to find approaches for
14 making them more commercially available.

15 Development of a dairy program to address climate
16 change mitigation strategies is also important, it's been
17 mentioned. I'll now move on to handling and food
18 processing. And prioritize -- the priority areas like
19 there's the issue of sanitizers, whether they're researching
20 to effective alternatives of sanitizers, because of the
21 obvious effect on occupational and human health,
22 environmental health, and stuff like that.

23 Research on best practices for identifying
24 potential effectors of heavy metal contamination. So in
25 organic production, we want to know what are the factors,

1 what are the routes by which we have heavy metal
2 contamination so that the organic community or family
3 doesn't contribute to this contamination. It's not
4 consistent with the beliefs of the organic community. So
5 more research so we can tell what not to do to contribute to
6 heavy metal contamination.

7 Effect of various types of food packaging on
8 organic products, antimicrobial, nanoparticles, surface
9 coatings of packages, plastic use, BPA for lining of cans
10 used for various products. So a lot of interesting
11 topics. Also, alternatives to conventional celery powder
12 for curing organic meat is also one of the important topics
13 for getting nitrites for curing meat.

14 Okay, maybe at this point, I will go to some of
15 the general research topics. Give me a second. Okay. When
16 it comes to -- I would have been in trouble if I didn't
17 mention the materials, GMO. There's a lot of work that
18 needs to be done when it comes to prohibited materials. The
19 effect of a genetically engineered plant materials in
20 compost, what happens to transgenic DNA in composting
21 process, a whole range of stuff. So DT, stuff when they are
22 in compost, after composting, would that result in
23 persistence in the environment of plant active? These are
24 all things that, and in order to enforce certain things, if
25 you want to be doing testing, improve testing methods for

1 all kinds of stuff so the organic community can keep pace
2 with changing technology and all of that.

3 Integrity of breeding lines and ways to mitigate
4 small amount of unwanted genetic material. Prevention of
5 contamination with various testing for fraud. All things
6 where we are looking at interesting methodologies include
7 pesticide recipe testing, GMO testing, in-field soil, and
8 all kinds of -- generally research so we can test better and
9 be sure of that enforcement of keeping our things that are
10 unwanted and detection can be more effective and fast.

11 There is general topics like increasing access to
12 organic foods, barriers to transitioning to organic
13 agriculture. So these are all topics. Let me quickly go
14 over some of the public comments.

15 The public comments generally favor or accept the
16 research priorities as important. Some folks ask for a
17 reprioritization of some of the things that were already
18 visited, but then there were other comments that said there
19 is a need for more research on the economic aspects of
20 organic agriculture, things like trade, operator economics,
21 market data, flexibility. There is also a whole farm
22 ecosystem and risk assessment somewhere there, already in
23 the research priorities.

24 Then organic and conventional nutrition
25 comparisons was also brought up. Assessment of the health

1 benefits and outcomes of organic agriculture. State-by-
2 state impact of organic farming, impact on water quality,
3 effectiveness of extension programs. Plastics kept coming
4 up a lot. PFAS and things leaching out of them. A
5 consensus stakeholder organization stated that there may be
6 differences in effects of plastics based on single-use
7 plastic mulch, landscape fabric that is used for multiple
8 years. There is a call for research to find out what are
9 the effects of even this landscape fabric that is used for
10 multiple years.

11 There is a request for whole farm assessments,
12 nutrition comparisons, weed management, and a number of
13 socioeconomic impacts of organic. So there -- we had a very
14 interesting set of comments that came in. Research into
15 methylamine reduction in plastic use just kept coming up so
16 many times. So that's about all that I have. I'm still
17 going through some of the public comments and I'll update
18 the document that we have with the public comments, but
19 that's all I have for now.

20 CHAIR BRUCH: All right, thank you so much,
21 Franklin. There was a lot to cover there and an incredible
22 amount of public comments that were really interested in
23 having input on this list. So thanks for the highlights
24 there. I see hands from Carolyn and then Kyla.

25 BD. MEM. DIMITRI: Thank you so much, Franklin,

1 for pulling all of this together. So I have two thoughts.
2 One is that we're lacking capacity in terms of trained
3 people to do research on organic. And I think this is
4 something that we kind of have to acknowledge. If we want
5 more research, like, I mean, I don't think it's our job to
6 increase the supply of researchers, but I think it's
7 something to be cognizant of. And then the other is this
8 idea of increasing access to organic foods.

9 So I've been hearing this disturbing comment in my
10 food systems class for the past three years. And I think
11 that there's a Gen Z, like, you know how millennials loved
12 organic, but the Gen Z, from my exposure at least, thinks
13 organic is elite. And I wonder, like, well, I wonder where
14 they got that impression from. And it doesn't matter how
15 hard I try to tell them it's not elite. It seems to be like
16 permeating the popular culture in this discussion. And it's
17 like, how do we counter that?

18 You know, I don't know how to counter it without
19 sounding elite. So I'm just throwing that out there to hear
20 what other people think.

21 BD. MEM. QUARCOO: Any comments?

22 BD. MEM. SMITH: I don't have a response to
23 Carolyn. Maybe we should try organic duh, and maybe
24 that. Like, because I feel like I heard they also have like
25 an eight second attention span. So maybe that speaks to

1 them. I don't know, that's my answer at this moment.

2 What I was going to comment on was I appreciated
3 seeing more than I feel like I've seen in the past, like
4 recommendations on research priorities specific to the
5 various aspects of the economics. A lot more in regards to
6 like trade and import and things along those lines. So I
7 thought that was timely and interesting.

8 And I made a note somewhere in my binder that Cat
9 had brought up around adding as a research priority around
10 like potato and onion seed cultivars, like in the
11 conversation that we were having around like ethylene. So
12 I'm sort of the -- currently one of the handling
13 subcommittee liaisons to the materials subcommittee. And so
14 I was just like flagging those for more discussion at the
15 subcommittee level, because I feel like in my experience
16 over the past several years that the like handling
17 subcommittee research priority items have been a little
18 stagnant. And so I was excited to see some sort of new and
19 fresh ideas this round.

20 I'm not 100 percent, I don't know -- anyway,
21 yeah. So I think that the potato seed cultivar sort of
22 discussion came out in handling because of the ethylene
23 conversation. But I don't know if that ultimately should be
24 where it lands. Like maybe it's a more general one. I
25 don't know where, maybe it's in crop. So anyway, just

1 wanted to point that out. And then also just, we -- a
2 couple of years -- I know that having someone from NIFA
3 periodically do a presentation has been something that's
4 gotten brought up like over time. And we keep like adding
5 it to the panel or like speaker list. And so I did note
6 that that was recommended again in some of the comments. So
7 just wanted to flag that too, to keep that on the radar, to
8 have someone from NIFA come back and talk to us about this
9 topic. Okay, thanks.

10 BD. MEM. QUARCOO: Thank you.

11 CHAIR BRUCH: All right, Andrea, and then
12 Allison.

13 BD. MEM. HATZIYANNIS: Yeah, I was going to
14 comment on Carolyn's comments. We have this discussion as
15 well in that the price differential is really a challenge
16 still for a lot of consumers. So I know helping to grow the
17 demand, or the supply will help that because the demand will
18 grow. And really trying to extol the benefits of organic.

19 We do organic and private label, and this is
20 becoming more prevalent because private label is a good
21 affordable option for the consumer. So continuing to find
22 different ways to make organic affordable will maybe help
23 with this, to lead this perception. And I know everyone on
24 this committee is working on this behalf too. So but
25 putting it out there to organic stakeholders, really helping

1 to drive that challenge to the community.

2 BD. MEM. QUARCOO: Thanks. Allison.

3 VICE CHAIR JOHNSON: Thanks, Franklin. Yeah, I
4 wanted to tag on to that point and then bring up one other.
5 I think that perception of eliteness has a lot to do with
6 affordability. And affordability isn't just price, it's
7 income for what it takes to survive in this day and what
8 options you have for paying for food relative to the other
9 things that you need to pay for in your life. But we did
10 receive some comments about focusing on the true cost of
11 food and sort of thinking about how we're talking about what
12 food actually costs.

13 In a lot of ways, organic actually comes out much
14 more affordable if you're not thinking about long-term
15 health care and destruction of ecosystems, costs that we all
16 bear, but that we don't feel the pain of at the checkout
17 counter. So that may be an area worth exploring some more
18 in the research priorities.

19 And then I don't think this is something that we
20 would incorporate into this document, but both in the seed
21 work that is ongoing and in the 606 and commercial
22 availability world, we continue to talk about how to make
23 available information about organic demand, demand for
24 ingredients and inputs and availability of ingredients and
25 inputs. Like aronia berry came up. How would someone know

1 that that was available in a glut in several places unless
2 you have been into this conversation or had some personal
3 knowledge?

4 So one idea we've been playing with is whether
5 there's a way the board could play a role as like a
6 clearinghouse of that information, something along the lines
7 of the research priorities list that we update every year
8 and get information about things that are becoming available
9 or needs that are occurring. So it'd be tricky to figure
10 out how to do it in a manageable and accurate way, but it
11 does seem like there's some work to be done at a fairly
12 granular level like this research priorities list to help
13 facilitate that flow of information.

14 BD. MEM. QUARCOO: Who is next in line? Is that
15 Corie or Karen?

16 BD. MEM. DIMITRI: I just have a very short
17 comment and then I'll stop talking again, okay? So I just
18 want to say that, you know, I teach in a food studies
19 program at NYU and everyone who comes here is like
20 thoroughly on board with all the environmental and social
21 costs in the food system. And so that's why it's really
22 disturbing because this is my food systems class that I
23 teach and that's what we focus on very carefully.

24 So if you can have someone with that level of
25 interest and that level of education and still have so many

1 people walking away thinking it's elite, I feel like I have
2 to say that there's something there that I am just not
3 seeing and I think it's a little bit more than price and
4 affordability. I think it's something to do with their
5 perception of like the ethos of organic. I don't really
6 know what it is, but thank you for letting me follow up with
7 that last thought.

8 BD. MEM. QUARCOO: Thanks, Carolyn.

9 CHAIR BRUCH: Thanks, Carolyn. Franklin, I'm
10 going to hand it over to you to facilitate the discussion so
11 I don't interrupt you anymore. Go ahead, sorry about that.

12 BD. MEM. QUARCOO: Corie.

13 BD. MEM. PIERCE: Yeah, thank you. Yeah, this
14 topic that Carolyn brought up is near and dear to my heart
15 on our farm and in Vermont in general and I'd say in the
16 Northeast pretty ubiquitously. Most of the farms are
17 small and so many farms including our own is, you know --
18 takes on educating the consumer almost as much as we take on
19 growing the actual food. And I'd say squarely in the center
20 of all that is like really trying to connect the dots for
21 people about, you know, whatever this perception -- you
22 know, the perception whether it's real with like actual
23 prices are higher or sometimes it's like not even true and
24 but there is still that just sort of assumption that organic
25 is much more expensive.

1 So, you know, we talked about some of the
2 priorities is like doing research and connecting dots around
3 health outcomes of organic and people who do really focus on
4 eating organically and the real health outcomes that, you
5 know, happen because of that and so if there's a way to
6 maybe connect that.

7 I understand what you're saying with college
8 students and that's really difficult but I think connecting
9 the dots and making it actually real and tangible, and I
10 don't know how to do that and that's -- you know, that's for
11 other people to figure out, but I think it's really
12 important and then I'd say that, you know, I'm hearing from
13 you and so many other people just a lack of connection for
14 people like literally a lack of connection to the land and
15 to their food and where food comes from and I know for us,
16 we do just -- we have thousands of visitors to our farm a
17 year and we live in a rural place where you think people
18 come to, you know, are used to coming to farms and we still
19 have a lot of new visitors every year, people who have never
20 really been on farms or seen food grow. And that, to me, is
21 one of the most important ways to change people's mind to
22 like actually see it growing in a beautiful and real
23 context.

24 And I know that's logistically really
25 challenging especially in cities but I always advocate for

1 just getting people out on the land and was excited to hear
2 about TOPPS' focus on those in-person meetings and
3 opportunities.

4 BD. MEM. QUARCOO: Thanks, Corie. Before, Amy,
5 how are we doing on time? I know Dilip had his hand up. Do
6 we have time for that comment? I don't know, how are we?

7 CHAIR BRUCH: Absolutely, no, this is an
8 incredible exchange here. Let's make sure to hear everybody
9 that wants to chime in. Dilip, do you want to go?

10 BD. MEM. NANWANDI: Well, listening to Corie and
11 Carolyn's comments and also reading in chat box and being
12 part of educational institutions that are teaching
13 organic, I have a thought about on these lines that we don't
14 have a really whole lot of workforce development in
15 organic and let's say 1 percent land, organic land compared
16 to the conventional land is just a 1 percent in organic.
17 And if we look at those kind of statistics and the need, we
18 need to have more educators and who can promote and, you
19 know, of course, the teams like Carolyn, myself, Franklin
20 and educational institution, produce things like workforce
21 development and so on those lines, I was just thinking that
22 there are some programs and where we have this point in the
23 research to actually get funding, again add into that such
24 as OEI program.

25 So they do have research, extension and education

1 component in that. So something on those lines, we can
2 probably think and include in somewhere in the priorities
3 that will produce more workforce in organic agriculture.
4 Just a thought to share. Thank you.

5 BD. MEM. QUARCOO: Okay, Amy, and then I'll hand
6 over back to you so we can be in control of the time.

7 CHAIR BRUCH: Perfect. No problem. Thank you,
8 Franklin. Really appreciate your eye on that. I just want
9 to make a quick announcement. I usually always do this
10 during the research priorities discussion, but I am just
11 such a promoter and in favor of the list that's assembled
12 here. It's a very comprehensive list. It's vetted through
13 public comment, participation. There's a number of things
14 on this list.

15 I would love to see the reconciliation between the
16 research that's conducted, going back into this list and
17 working together. If research is done, hopefully it is
18 something in the categories that we illuminated here. So I
19 really want to make sure this list is circulated to those
20 universities that are doing research and to the groups that
21 are looking at awarding grants.

22 I think this list is really important. And then
23 public comments were just amazing in this line. Like I
24 mentioned before, but I wanted to elevate the residue
25 testing. My ears really perked up there. I think there's

1 an incredible opportunity to benchmark with other industries
2 and learn best practices and apply those back into our
3 world. We don't need to be recreating the wheel. I think
4 we learned that from a farmer point of view. We need to be
5 networked. And I really encourage this community to be
6 networked to other industries as well, just to adopt best
7 practices. And then I really liked the idea and the thread
8 on the agronomics and economics. There was some comments
9 about that in the public forum, just elevating and doing
10 more research in trade, imports, cost of production, et
11 cetera. So I just wanted to elevate that as well.

12 But anyway, incredible, Franklin. Thanks for
13 shepherding this process. Is there anything else from your
14 material subcommittee report?

15 BD. MEM. QUARCOO: No, not at this point.

16 CHAIR BRUCH: Okay. Thank you so much. We will
17 transition on.

18 We are in the last subcommittee report of our
19 meeting. And this is the Compliance, Accreditation, and
20 Certification Subcommittee. Kyla Smith is our subcommittee
21 chair and she's done an incredible job. This subcommittee
22 tackles, again, just similar to Materials, really
23 challenging subject matter. There's a lot of gray areas
24 that we discuss with the hopes of making them more black and
25 white. So Kyla, I will turn it over to you.

1 BD. MEM. SMITH: Thanks. All right. Before we
2 get into our agenda items today, I just wanted to take a
3 moment to acknowledge some turnover we had on our
4 subcommittee. So we had to say goodbye to Jerry and Kim and
5 Nate Powell-Palm, who have cycled off of the board. And
6 Nate Lewis is also no longer a member of CACS. He very
7 appropriately downsized his workload this year. He was on
8 every subcommittee last year. So we know he's not too far
9 away if we need to phone a friend.

10 And I also wanted to give a warm welcome to
11 Catherine and Cat who have joined us and have already been
12 great contributors to this subcommittee. And I'm sure that
13 they will continue to make great strides as they just
14 continue on. It's a fun one. We dig into some great
15 stuff. Okay.

16 So let's get to it. We have three agenda items
17 today. The first is a proposal on risk-based certification.
18 We also have a proposal on residue testing for a global
19 supply chain with updates to guidance documents. And
20 lastly, we have a discussion document which is also on
21 residue testing that looks at the potential for some
22 regulatory updates. And we will start with risk-based
23 certification. And I am the lead on that, so I'm just going
24 to keep on talking.

25 Okay, so as stated in the document, this is not

1 actually a new idea or concept in the world of organic
2 certification. That said, due to many factors such as the
3 ongoing human capital needs and conversations, the
4 implementation of multiple roles in a very short period of
5 time, one of which requires certifiers to evaluate an
6 operation's risk level in order to increase the oversight
7 mechanisms on high-risk operations, this topic is rising to
8 the surface now.

9 But again, in reality, certifiers have been making
10 risk-based decisions since we started our individual
11 journeys in organic certification. Maybe it wasn't
12 specifically called out as such, but surprise, this is what
13 we've been doing all along.

14 What is new and different is that we are all
15 talking about it collectively, which I would argue is a
16 really good thing because it's allowed us to explore this
17 concept in new and different ways. We are all learning from
18 one another, and this collaborative nature is one of, if not
19 my favorite aspect of the organic certification community.
20 And it's quite unique. I've heard this time and time again
21 from people entering into this industry, from outside
22 industries, that in most sectors and industries that
23 competitors aren't as collaborative and sharey as we all
24 are. And so that's really special and we are taking full
25 advantage of it.

1 This collaboration has also extended to the NOP in
2 new and different ways as well. And this is exciting and it
3 empowers certifiers to do the work that we all know how to
4 do best in partnership with the NOP versus us trying to move
5 away from a one-size-fits-all model, but being fearful of
6 non-compliances ourselves as the result of accreditation
7 audits. This also allows us to be more consistent-ish in
8 our thought processes and how we approach certification
9 processes and decision-making.

10 So you might be thinking, okay, okay, okay,
11 Kyla. Risk-based certification is the best. Certifiers are
12 already doing this, so why do we need this document? From
13 my perspective, there are a couple of reasons that rise to
14 the top. Number one, it sends a clear signal to the entire
15 organic community that this is an important topic. And
16 number two, it attempts to keep us all on the same page
17 through a common set of definitions, criteria, and a
18 framework that certifiers can utilize to maximize their time
19 and resources most effectively and ensure that certification
20 remains accessible to all.

21 So I'm going to review the public comment summary,
22 or yeah, review the public comments we've received this
23 round and summarize them. In general, stakeholders across
24 the board are appreciative of the board's work on this topic
25 and think it is a needed conversation in the

1 industry. Stakeholders identified several areas that they
2 liked. One was the common set of definitions and the idea
3 of baseline criteria with the ability for certifiers to flex
4 as needed.

5 There is also an appreciation on the collaborative
6 nature by individual certifiers, the ACA and NOP. In
7 particular, commenters emphasized that in order for this to
8 be successful, NOP auditors need to be trained in the same
9 manner to allow certifiers to adjust procedures and
10 oversight mechanisms of an operation using this risk-based
11 approach.

12 As stated by a commenter, there is some anecdotal
13 evidence that this has been the experience from certifiers
14 during their accreditation audits this year. And
15 personally, I just want to encourage certifiers that are
16 undergoing audits this year to share your experiences with
17 one another. Again, this is how we learn, we collaborate,
18 we learn. Are you noticing a shift compared to last year --
19 compared to last, sorry, let me start again. Are you
20 noticing a shift compared with your past audit
21 experience? And if not, I also encourage you to share that
22 feedback with the program.

23 Change is challenging. We don't always get it
24 right on the first try, but if we're not communicating, then
25 we're not able to learn and grow. I'm sure I missed some

1 comments of other things that people liked in the document,
2 but I just wanted to demonstrate some general areas of
3 support and some things that people called out that they
4 liked. So while there is strong support from stakeholders,
5 there were definitely a couple of points that could use some
6 fine tuning.

7 Number one, the document leans heavily on ACA best
8 practice documents. This made some stakeholders
9 uncomfortable, specifically regarding enforceability. There
10 were some proposed definitions that there were some
11 additional suggestions for wordsmithing and also ensuring
12 that the levels at which risk-based oversight is applied
13 using these definitions is clearly explained and
14 distinguished in training resources, such as the existing
15 Organic Integrity Learning Course.

16 As far as the risk criteria, there was, sorry -
17 - as far as the document did identify any additional
18 stakeholders deemed necessary to collaborate in this
19 area, but stakeholders did provide additional comments
20 regarding building a framework to engage other stakeholders
21 beyond certifiers and NOP, both in an overarching risk
22 criteria conversation, as well as in the reporting of acute
23 risks and wanting to make sure that they had a seat at the
24 table.

25 And then as far as the oversight matrices, some

1 commenters cautioned us from being overly prescriptive here
2 and are not supportive of additional oversight mechanisms
3 that would increase activities without adequately balancing
4 streamlining in other areas. And one commenter wanted us to
5 more specifically state a recommendation to utilize a common
6 OSP.

7 And then in regards to training, I'm wanting to
8 just ensure that there was a strong -- the building of a
9 strong framework and then additional training to support
10 this. Judgment is a skillset and it does take additional
11 training. And also wanted to just acknowledge that the
12 training of NOP auditors sort of remained on pace with this
13 ongoing conversation.

14 Okay. So this is a topic I feel like that could
15 be talked about forever. We will be continuing to fine tune
16 and improve until the end of time. So on one hand, I want
17 to acknowledge that on this topic, we will never get to
18 complete or perfect. On the other hand, I do think that
19 there could be improvements made based on the feedback that
20 we received. Additionally, the ACA is planning to continue
21 its work on this topic and that there may be more examples
22 of the types of things that were already identified in this
23 proposal that can help the community have some more like
24 tangibles. And so I do propose that we send this back to
25 subcommittee, but before I make the motion, I'll open it up

1 for discussion.

2 Go ahead, Nate.

3 SECRETARY LEWIS: Yeah, I'm just sort of curious
4 about the balancing of sort of sending back to subcommittee
5 to get it perfect versus passing it now to get something
6 good across the finish line sooner. And I don't know if
7 there's been some thought going into that and if you could
8 elaborate there.

9 BD. MEM. SMITH: Yeah, I mean, I don't think it
10 will be perfect in the fall either. I think that we can get
11 it. I think that this is a foundational tenant in the
12 organic industry is this continuous improvement aspect,
13 right? And so that exists in certification too. I mean,
14 like we are constantly talking about streamlining processes
15 and all the things at PCO and I'm sure other certifiers are
16 having those same conversations.

17 And so I do think that we can incorporate some of
18 the comments that were received in the feedback this round
19 and get it better. And I think that, you know, I'll be --
20 the fall meeting's my last meeting and so I'll be wanting to
21 really pass it at that meeting. And I think that that's
22 accomplishable based on the feedback that we received this
23 round. Amy.

24 CHAIR BRUCH: Kyla, thank you so much. This is
25 incredible work and really relevant, important, both from a

1 farmer point of view and a certifier point of view. And I
2 think everywhere in between. I think you said it best once
3 that certifiers are really good to add things to their day
4 but maybe not subtract them. So, you know, with the
5 constant evolution and continuous improvement methodologies
6 that are, you know, coming at us, the additional threats
7 from a standpoint, you know, that we heard from the
8 community, I think we just got to re-look at how we're doing
9 things. I know I've heard the concept re-imagining
10 certification. That's probably at the one extreme end but
11 like what you said with the risk management framework,
12 certifiers are currently doing this but I think it's really
13 good to expand this.

14 From a farmer point of view and Kathryn kind of
15 mentioned this, it really doesn't make sense for a one size
16 fits all approach. We're all very different and we're
17 different in our, you know, just maybe the vulnerabilities
18 that we reflect. You know, some of us have mixed production
19 operations, some of us don't, and the list goes on and on
20 and on.

21 From a certifier point of view, I think we really
22 do need to help determine some efficiencies there. How do
23 we keep the program safe? So keep the lights on and we only
24 have 24 hours in a day and I know we all wish we had more,
25 especially probably in preparation for this meeting but, you

1 know, the realities are that's not going to change. So I
2 think -- I love the concept of this and I love, you know,
3 the potential from what I heard from the public comments and
4 you highlighted those, you know, there's a need to maybe put
5 a few things in here. Right now, this is a concept and I
6 think our community is saying we want to see this, you know,
7 a little bit more stricter with this so we can rely on this,
8 whether it's a guidance document that we can mention to the
9 NOP, you know, to start working on this or even regulation
10 if possible and make this, you know, something that has more
11 teeth to it.

12 So I think that's good and the other point I
13 wanted to elevate, I love that the community wanted to have
14 more involvement. It's an incredible, you know, project
15 that certifiers are working on but there were several
16 members of the community that said, hey, let's put more
17 heads together and let's look at this from all different
18 angles. I know there were -- yeah, several groups that
19 said, hey, we have maybe a component that would be very
20 interesting just how we're looking at the markets.

21 I know from a farmer point of view, you know, I
22 would like to elevate the agronomics piece. We are a
23 process-based system and we have residue testing on the
24 agenda but the agronomics of an organic farm are very
25 different from the conventional farm and you can really see

1 that. I'm just thinking of my own farm. When you drive by
2 it, I have three times the amount of equipment than my
3 conventional neighbors. So that's one thing that stands out
4 in my head. You know, the list goes on and on and on.

5 When you're looking at disease threats, I think
6 Marguerite mentioned this in the TOPP presentation, you
7 know, there is, I think, only 18 producers in Alabama.
8 Why? Or certified operations in Alabama. Why? It's
9 challenging to operate certified organic farms in places
10 that, places in the South and I know Logan can attest to
11 that. So, you know, just bringing in that agronomic
12 component, I'd love to see that as well.

13 And yeah, love to keep working on this. I know
14 what you said, that's a topic that we could keep working on
15 forever but we will try to, yeah, put our heads together in
16 CACS. I support your thoughts on, you know, taking it back
17 one more time to subcommittee and we can work really hard
18 collectively and get a really nice product out for everybody
19 in the fall. So thanks again, Kyla, for your work on this.

20 BD. MEM. SMITH: Thanks, Amy. Carolyn, I saw your
21 hand go up and down. Did you want to say anything?

22 BD. MEM. DIMITRI: Well, it just doesn't sound
23 like anything after all the beautiful things Amy said. I
24 will say like the risk-based certification and then the
25 residue testing are like -- they're so far outside of my

1 realm of understanding, but I do appreciate how Amy and Kyla
2 have been able to, like, bring the farmer and the certifier
3 side to this to try to make something that works really
4 well. And I like the idea of you spending a little bit more
5 time right before you leave the board and get it to be as
6 good as you possibly can. And I'm thankful that you're
7 willing to keep continually explaining what this means to
8 me. So thank you.

9 BD. MEM. SMITH: Yeah, you bet. I know Amy and I
10 have come from very different perspectives and it's so fun
11 to talk about these things because I learned so much and I'm
12 sure Amy learned so much and it's just because of that, I
13 feel like we are able to incorporate a wide swath of
14 information and approaches and perspectives and turn out a
15 better work product.

16 So anyway, I've enjoyed collaborating with Amy.

17 CHAIR BRUCH: Thank you, Kyla. Thanks, Carolyn.
18 You beat me to the punch. I had that segment into the
19 residue introduction to highlight just the synergies there,
20 but I really appreciate Kyla bringing our worlds together.
21 It's been really fun looking at what do the regulations say?
22 Well, how does it look like it isn't on the ground in the
23 farming community? So it's just been a real rich
24 conversation. So appreciate it.

25 BD. MEM. SMITH: I don't see any other hands. I'm

1 going to talk slowly for a minute.

2 Okay, I'm going to make the motion to send this
3 document back to subcommittee.

4 CHAIR BRUCH: All right, table mate, I will second
5 that. Yes, we have a motion to send this back to
6 subcommittee by Kyla Smith and a second by Amy Bruch. And I
7 am going to start our voting with Allison Johnson.

8 VICE CHAIR JOHNSON: Yes.

9 CHAIR BRUCH: Nate.

10 SECRETARY LEWIS: Yes.

11 CHAIR BRUCH: Cat.

12 MS. ARSENAULT: Cat had to step out.

13 CHAIR BRUCH: Thank you for reminding me and our
14 Board members of that. Okay. Dilip.

15 BD. MEM. NANDWANI: Yes.

16 CHAIR BRUCH: Logan?

17 BD. MEM. PETREY: Yes.

18 CHAIR BRUCH: Corie?

19 BD. MEM. PIERCE: Yes.

20 CHAIR BRUCH: Franklin?

21 BD. MEM. QUARCOO: Yes.

22 CHAIR BRUCH: Kyla? Sorry. Yeah, Kyla.

23 BD. MEM. SMITH: Yes.

24 CHAIR BRUCH: Still like to call on you.
25 Javier. Absent. Brian.

1 BD. MEM. CALDWELL: Yes.

2 CHAIR BRUCH: Kathryn.

3 BD. MEM. DESCHENES: Yes.

4 CHAIR BRUCH: Carolyn?

5 BD. MEM. DIMITRI: Yes.

6 CHAIR BRUCH: Amanda?

7 BD. MEM. FELDER: Yes.

8 CHAIR BRUCH: Andrea?

9 BD. MEM. HATZIYANNIS: Yes.

10 CHAIR BRUCH: And the Chair votes yes.

11 SECRETARY LEWIS: For the motion 13 yes, zero no,
12 two absent. The motion carries.

13 BD. MEM. SMITH: Sorry, I need to keep talking.
14 All right, we're moving on to the two residue testing
15 documents. So first we're going to talk about the proposal
16 which is related to the updates on the guidance document.
17 So Amy, I'm going to turn it over to you to get us started
18 on the slides here.

19 CHAIR BRUCH: Okay, excellent. Thank you,
20 Kyla. No, it's not time for an icebreaker or a knock knock
21 joke. But I do have a question for the Board. This word,
22 you've got to guess the word, this word is mentioned seven
23 times in OFPA, our Organic Foods Production Act, 126 times
24 in the preamble to the final rule that established the
25 National Organic Program, and 32 times in the NOP, the

1 National Organic Program regulations. Can anybody guess the
2 word on the Board?

3 Okay, I'm going to call on Andrea because you look
4 like you have the answer.

5 BD. MEM. HATZIYANNIS: I want to have the answer.

6 CHAIR BRUCH: Or Kathryn, call a help line, either
7 one of you.

8 BD. MEM. DESCHENES: Test?

9 MD. MEM. HATZIYANNIS: Maybe substance?

10 CHAIR BRUCH: Substance, you know, that is a
11 really good guess. I'm sure it is in the documents here
12 before us probably just as many times. But test is what I
13 was looking for.

14 And I apologize, Andrea, I keep putting you in on
15 the spot. You know, I'm just, you know, no more slack for
16 the new board members.

17 BD. MEM. HATZIYANNIS: You're good.

18 CHAIR BRUCH: Anyway, here's the answer, test or
19 testing. I guess I combined those two words. But anyway,
20 that was kind of the interlude here. We have -- Kyla and I
21 have a few slides just to kind of introduce the umbrella
22 topics. So we are going for, along with Nate, one of the
23 longer titles in NOSB history here. I think you did beat me
24 out here, Nate. But the concept here is oversight. It's
25 oversight to deter fraud and we're looking at residue

1 testing for a global supply chain. And we have two
2 documents here. And that's one thing I want to know. I
3 really appreciate, you know, everybody's public comments on
4 this. We did have two very similarly titled documents. So,
5 you know, there was a lot of folks that kind of commented on
6 both of them at the same time.

7 So Kyla and I are going to try to do our best to
8 parse out some of the comments in relationship to each
9 document here at the end. But these slides are just going
10 to kind of give us a general overview. And before I begin
11 with that first slide, I just -- I know everybody knows this
12 about me, but obviously this topic is deeply important to me
13 regarding oversight and enforcement. To me, I do feel the
14 weight of my former stakeholder group as I also live the
15 realities every day on my family operation. Being a part of
16 the solution is one of the main reasons why I applied to be
17 a part of the Board. And I'm thankful that I was accepted.

18 As many commenters stated, there is a sense of
19 urgency. Kyla mentioned this kind of in her kickoff to the
20 subcommittee, but I actually have been fortunate to
21 collaborate with many talented board members on this subject
22 matter, including two that rotated off, Nate Powell-Palm and
23 Kim Huesman last year. And then Nate Lewis, who, you know,
24 I definitely want to encourage your participation in this
25 conversation. He's been an incredible partner, just helping

1 to decipher the technical matters here. And also Kyla, my
2 table mate, as we all mentioned, you know, it's just been an
3 incredible relationship that we established both personally
4 and professionally through the conversation that we had
5 before us.

6 So this slide in particular just kind of gives us,
7 again, the overview of what we're going to be getting into.
8 Organic is a process-based standard. We heard the community
9 loud and clear on this. And what we're honing in on is
10 testing for a tool for compliance verification. And I've
11 reiterated this a few times, but the SOE, so the
12 Strengthening of Organic Enforcement Rule, really does
13 provide that supply chain traceability. And we heard in the
14 NOP update that, I believe there were over 7,000 additional
15 operations that came above radar to be certified.

16 So, I mean, that's incredible just transparency in
17 what the SOE has provided us just to date. And so I really
18 view testing as complementary to that because it is a
19 compliance verification tool for some of those new
20 operations or for some of our current existing
21 operations. I also believe that testing is an
22 underdeveloped tool. I think there's always going to be
23 innovation. And we heard about it a little bit in public
24 comments, but it's something that I believe can help also
25 increase efficiency too. So moving on to the next slide.

1 One other point in comment, we kind of realized
2 how integrated the word test or testing is in our
3 regulations and OFCA, the Organic Foods Production Act. But
4 additional jurisdiction here is that AMS has legal
5 responsibility to ensure NOP has adequate regulatory
6 standards, enforcement guidelines, and residue testing
7 procedures.

8 And I forgot to mention on that first slide, but I
9 tried to incorporate different actual real farming pictures
10 from members of our Board. So the previous one was credit
11 to Nate Lewis and this one is from Leanda. So thank you. I
12 just think these images are both beautiful and warm my heart
13 from a farming standpoint to just share our world with
14 others.

15 Okay, next slide. This one, I'm going to credit
16 Kyla for crafting. I think this is a really good way to try
17 to get after what we're doing here. So Kyla, I'm going to
18 turn it over to you.

19 BD. MEM. SMITH: Yeah, so this slide attempts to
20 address some comments that we heard last round in linking
21 the risk-based document with the residue testing document.
22 So there was like some comments that were like, just combine
23 them into one thing. They're like in the same universe,
24 right?

25 And it also attempts to address comments that we

1 received this round regarding the guidance doc revisions
2 being a proposal and that outpacing the regulatory updates,
3 which is currently as a discussion document and some
4 comments sort of saying like, is that putting the cart
5 before the horse? You sort of can't do them -- you should
6 do them together.

7 So at the top you'll see there's this overarching
8 assessment of risk that is being applied to all operations.
9 Certifiers are evaluating what risks are present and why
10 they are present. And then they may choose to use the
11 verification tool of testing. This is not chosen in all
12 cases. And so there's that dotted blue arrow connecting the
13 risk piece down to the residue testing piece. And that's a
14 dotted arrow because that testing oversight mechanism,
15 additional testing mechanism, is not chosen in all cases.

16 So then moving down into the residue piece, it
17 shows that the two parts of the residue testing work that
18 the Board's currently working on. The first one is the
19 guidance document proposal and you can see that it's a
20 little ahead of the regulatory update. The guidance
21 document revisions got started ahead of the regulatory
22 discussion. And so that's just where we are.

23 It just is a reality of when we started working on
24 those items. And that said, it is our understanding that if
25 the guidance documents do make it all the way through

1 revision ahead of the regulatory updates, then the guidance
2 documents would get a second round revision to align with
3 those regulatory revisions. And we saw that happen with
4 SOE. So SOE was published and we saw the NOP program
5 handbook documents get updated to align with the new SOE
6 requirements.

7 And I also just wanted to note that it is our
8 expectation that the guidance documents revisions that we
9 are proposing would go through the notice and comment
10 rulemaking process. And I think we can go to the next
11 slide.

12 CHAIR BRUCH: All right, so thank you, Kyla, for
13 articulating the big picture here, the macro, and then now
14 getting into our work agenda items. We got two. Here's
15 kind of the distinguishing characteristics.

16 As Kyla mentioned, we have the proposal on
17 guidance. So these are the instruction documents that
18 certifiers use, but our community also let me know they are
19 important for other stakeholders, including farmers and
20 businesses and inspectors as well. Also, the goals of this
21 is really to further develop testing as a tool resources.
22 This is the document's fourth round of public comments. So
23 it was in discussion mode for three rounds intentionally
24 because as you guys have paged through the documents, an
25 omnibus approach to updating the relevant guidance

1 documents.

2 And I loved Kyla's approach. Some of it is, and
3 it's kind of a testament to how the inerts group worked on a
4 very challenging matter is to really tee up options. There
5 might not be one route to go down on some of these difficult
6 matters, which Kyla will get into in the 2613, but we
7 created some options. So NOP has some ideas on what might
8 be the best route. And we'll get into that here to come.

9 And then we have the discussion document
10 regulation review. And that really was developed through
11 questions that were asked in that first couple of rounds of
12 the guidance document discussion. So this is a subset that
13 was borne from conversations with our community.

14 All right, without further ado, let's get into the
15 proposal. So what we have here is a roadmap on the next
16 slide. And here's another beautiful picture. This is from
17 my soybean field a couple of years ago. So hopefully the
18 soybeans that were planted a couple of days ago will grow up
19 and look like this in a couple of months. That's the goal.

20 Okay, looking at the roadmap on the next slide,
21 these are the documents. There's five of them that we are
22 going to be quickly reviewing and summarizing public
23 comments on. I'm going to take the first three and then I'm
24 going to turn it over to my virtual table mate and partner
25 in this process, Kyla, to kind of review really where the

1 rubber meets the road and that's that 2613 responding to
2 results.

3 But essentially what we did is took a more broader
4 scope approach to these documents. Many were last updated
5 in 2013 when the -- shortly after the pesticide residue rule
6 was put into place. We tried to incorporate an expansive
7 thought process and tried to integrate elements of the
8 evergreen principle because although we would like to update
9 these annually, that isn't possible. So we had to keep that
10 in the back of our heads when we approached every single
11 document.

12 So just a few points to highlight on the 2610.
13 That was more information on sampling equipment and
14 inspector training and collection diversity. One thing I
15 forgot to mention on the front end of this is through public
16 comments, I heard that IOIA added 600 additional inspectors
17 or at least that 600-plus went through training, which is
18 incredible. So I need to dive into that further, but I know
19 human capital is one thing that does come up when we talk
20 about adding things to certifiers plate, but that there's
21 some real good storylines happening with IOIA. So I was
22 really encouraged by that.

23 One commenter mentioned that more targeted testing
24 presents a more effective use of resources than random
25 sampling. So when we use the high or the risk-based

1 approach for certification, that potentially might lead to a
2 better identification of an issue or if an issue exists. An
3 alternative perspective, though, I just wanted to bring this
4 up was that certifiers wanted to see NOP take on some of the
5 burden with the sampling program. And I just wanted to
6 mention with that, we heard from the NOP update that there
7 are some things that NOP is doing with their surveillance,
8 but also certifiers are the first line of defense. They
9 have the relationships with the certificate holders. So
10 it's important to really stay tight through the process as
11 Kyla and I have to see what's possible.

12 Laboratory selection criteria and the target list.
13 We looked at both of those. In the past, the "target list,"
14 which is the 2611-1 was basically a closed list of
15 substances that you could perform one test on to test for
16 many different things. The concept of that is good, but as
17 we've already discussed, the one size fits all approach
18 doesn't always work. Doesn't always work for certification,
19 doesn't always work for farming and for testing kind of the
20 same thing. So we really drilled in and highlighted the
21 idea of the right test for the right situation, honing in on
22 the reason, honing in on the threats.

23 We heard from public comments on that, that many
24 comments appreciated the importance of the regional and crop
25 specific differences. One certifier said we are in favor of

1 removing the focus on the target list or the catcher's
2 approach, the catcher's test. It helps encourage certifiers
3 to test based on identified risk instead of a predetermined
4 list of substances. So I really appreciated that comment
5 from that certifier.

6 Kyla, I'm going to turn it over to you. I know
7 this is a subject matter I could probably talk about all day
8 long, but I know we do have a time situation that we're not
9 missing out, so go ahead.

10 BD. MEM. SMITH: Yeah, before I go into the 2613
11 things, I just wanted to add a couple of items for what Amy
12 just went through. And that is, first of all, these
13 guidance documents were published in the NOP Program
14 Handbook before there was an Organic Integrity Learning
15 Center. And so what happened was that there is a course in
16 the Learning Center that addresses a lot of these things
17 that were identified as missing from the documents.

18 And so once we started digging in a little bit
19 more, too, with adding things to the guidance documents, it
20 seemed quite redundant to repeat things in both places and
21 then you've got to update things in both places. And so
22 anyway, we did try to just link resources and hopefully that
23 -- I think I saw from comments that that was a valued
24 approach.

25 And then the other thing I just wanted to

1 highlight from the 2610 is that there was some, specifically
2 in regards to the duplicate sampling and retention, there
3 were definitely some stakeholders that wanted to make sure
4 that we provided more guidance and context around
5 that, particularly in regards for inspectors taking those
6 samples and retaining them, and liability, and if that was
7 really what we meant, or if we were intending that to be
8 more focused at the laboratory level. So I just wanted to
9 call those things out from the comments as well.

10 But I definitely think in regards to the 2611-1,
11 expanding out the types of testing was welcomed. Okay, so
12 in regards to 2613, you can see the areas that we honed in
13 on there, and as Amy said, similar to the approach with
14 inerts, this specific area of the guidance documents offers
15 many solutions, and we ask the NOP to explore various
16 solutions to determine the most viable option to address
17 these identified issues, and encourage looking at the entire
18 body of work.

19 So as Amy also said, there's been several
20 discussion documents that received many comments. We tried
21 to include suggestions from those comments into this
22 proposal. There may have been others that we missed, or
23 didn't make it in, or whatever, but just encourage to look
24 at the entire body of work.

25 And again, most notably, that the lack of

1 tolerances for all substances for all crops, which requires
2 certifiers to default to the 0.01 PPM, is just not working
3 in a lot of situations, and certifiers need different tools
4 in our toolbox to evaluate these scenarios. And so again,
5 in general, commenters were very supportive of the Board's
6 work in this area. One commenter did point out a typo,
7 specifically in this section, so I think we can address that
8 in the cover sheet if this passes. And then just going
9 through here, starting with number one, with the detection
10 without tolerance.

11 Most commenters agreed with expanding guidance to
12 address residues detected on non-edible portions of the
13 plant, and for crops with no established tolerances. One
14 commenter highlighted that due to this -- or due to this
15 scenario where there is no tolerances, that it leads to
16 extra investigative burdens being placed on producers, and I
17 would add that this also -- this extra burden is felt by
18 certifiers as well.

19 Another commenter did specify that they thought
20 that consequences should not be relaxed for the case of
21 positives, with positive results for pesticides with not
22 registered for the crop. So all this to say, all commenters
23 were in favor of just more clarity here to reduce the burden
24 on producers and certifiers.

25 Moving on to the next part, in regards to residues

1 detected on crops that are dehydrated or extracted or
2 concentrated, most commenters were supportive of
3 recommendations made in this area. One commenter indicated
4 that they preferred the EU model to address this, and a few
5 commenters indicated that processing food frequently
6 concentrates pesticide residues, and that that shouldn't be
7 a reason to allow increased levels of pesticide residues in
8 those processed foods.

9 The next area is for other prohibited substances
10 and excluded methods, and commenters agreed with the need
11 for the expansion on how to address these other prohibited
12 substances beyond pesticides, and that would include, you
13 know, solvents and excluded methods and other prohibited
14 substances and practices.

15 The next one is the notification of downstream
16 buyers. Commenters indicated that there are pros and cons
17 to this, for this notification, and want to ensure that
18 there is appropriate guidance in order to ensure expected
19 outcomes. One commenter indicated that until stop-sale
20 actions are authorized, that this is a necessary step, and
21 another commenter did question whether or not this would
22 require a regulatory change.

23 And then lastly, I'll cover the last two, the gaps
24 in decision-making in the specific redline corrections, and
25 so the gaps in decision-making was really focused on how

1 certifiers should determine the status of land eligibility
2 in the case of drift and the issuing of non-compliances for
3 not adhering to one's organic fraud prevention plan, and
4 then there was a couple of specific redline corrections.
5 And so most commenters agreed that drift is a real problem,
6 and that NOP needs to clarify land eligibility
7 determinations in the case of drift events for consistent
8 implementation amongst certifiers, and one commenter
9 suggested that the EPA notification that is stated in this
10 guidance document should be the responsibility of the
11 NOP and not of the individual certifier.

12 So I think that sort of covers that area, and then
13 I'll move on to 5012, and so this was the inclusion of the
14 ability to test for these types of prohibited liquid
15 fertilizers, and some commenters supported this idea while
16 others were not clear on what the criteria was involved
17 there, and others stated that this shouldn't be added until
18 testing methodologies were approved.

19 It's my understanding that these testing
20 methodologies are in the works, and so this was sort of a
21 placeholder, if this is our one opportunity, to propose
22 revisions to these documents, but I know Amy, you've been
23 more closely working on that situation, so I'll certainly
24 open it up to you for comments there. But real quick, we
25 also had proposed some other guidance documents, and some

1 commenters offered support for these additional guidance
2 documents, most specifically related to importer testing,
3 also with the suggestion that there should be more of a
4 focus on exporter testing, and they also supported the
5 idea of a residue sampling decision tree, so that's where --
6 so I don't know if you have any additional comments on my
7 side of the board here, but feel free.

8 CHAIR BRUCH: No, I think you did a really great,
9 comprehensive overview on really the technical aspects of
10 it, Kyla, thank you so much, and Kyla, I guess there's one
11 minor thing, the approval of the liquid fertilizer, just
12 update there is exactly what Kyla mentioned, it's a
13 placeholder work is being conducted right now for
14 authenticity testing within organics, which is incredible,
15 it just is a testament to innovation, and that's happening
16 in partnership with AOAC on an approved methodology. So I
17 know we got into a lot of detail there. We love this so
18 much, and we want you all to love it, but we know we need to
19 open it up for discussion, and we are going to turn to that
20 right now, so, and please ask any questions.

21 Brian, go ahead.

22 BD. MEM. CALDWELL: Well, all I can say is wow, to
23 that, that was kind of unbelievable, and amazing, amazing
24 work, amazing level of detail and penetration into the
25 issues.

1 I had a couple questions, one was -- the first one
2 was, I think I heard something about how -- maybe it was a
3 comment that certifiers should be in charge of this and not
4 the NOP, and what I'm wondering about is, if that's the
5 case, and maybe we can broaden it beyond the NOP to
6 government agencies, the whole issue of testing at the
7 border, it doesn't seem like that's a place for certifiers
8 to step into things. It seems like that's something that
9 border officials should do.

10 And so I'm thinking that -- I just want to throw
11 that out there. The second thing was, in one of our oral
12 comments, a person made a very strong distinction between
13 monitoring for compliance and monitoring for fraud; and to
14 me, those things are very, very closely related, and I
15 couldn't understand why the person was making that
16 distinction, and it almost sounded like they were saying,
17 well, certifiers really don't have anything to do with
18 fraud. We just talk about compliance, and I thought that
19 was kind of a little passing the buck. So anyways, if you
20 could respond to those two issues, I'd really appreciate it.

21 CHAIR BRUCH: Yeah, thanks for the question,
22 Brian. Kyla, do you want to go ahead on those particular
23 questions, and I can add in, since people are listening.

24 BD. MEM. SMITH: I'm not quite remembering the
25 context of either of those comments, to be quite honest with

1 you. This week has been a whirlwind, so anyway, I can go
2 back and look at the transcripts.

3 And as far as the testing at ports, I feel like
4 there's been a lot of discussion around that. Certifiers
5 certainly have done that, and there have been directives
6 that have required certifiers to do that, so there's that
7 aspect.

8 And there also, in addition to this work, there's
9 the additional bill that was introduced that has a lot more
10 of a focus on testing of imported feedstuffs, and so I think
11 that these conversations are sort of getting a little bit
12 smashed together. And I think that there are definitely
13 those in the certifier community who absolutely would agree
14 with you, Brian, that other agencies are already there at
15 the ports. They should just do the testing, and it's an
16 additional expense on all the things for certifiers to get
17 there and do the testing.

18 But that said, those types of testing events are
19 certainly occurring. As far as fraud versus compliance,
20 this could -- again, I don't quite remember the context of
21 that specific comment, but I definitely feel like there is
22 the distinction between additional oversight mechanisms for
23 high-risk operations, which could include testing, could
24 include unannounced inspections, could include additional
25 audits being part of a supply chain traceability audit, like

1 many different additional oversight mechanisms, versus
2 perhaps the getting it done for your 5 percent and you have
3 to, and being a little bit more economical in your choice,
4 oh, I'm going to be at so-and-so's. I might as well do the
5 testing next door because I'm here, right, versus really
6 focusing in on always testing or doing an unannounced for
7 the verification of fraud. It is an accreditation
8 requirement to conduct 5 percent of our -- conduct residue
9 sampling and unannounced inspections at 5 percent of our
10 operations.

11 So I don't remember if that was the context in
12 regards, but that's what was coming to my mind in this
13 current moment.

14 BD. MEM. CALDWELL: Well, thank you both so much
15 because, I mean, this is really an amazingly complex topic
16 and you guys have done a great job. I really appreciate
17 it. Thank you.

18 CHAIR BRUCH: Thank you, Brian.

19 One thing to mention, I think in this equation, I
20 think all options are on deck. I think everybody has a role
21 in terms of oversight and enforcement in the equation. And
22 just rolling it back to the scope here and Kyla did a good
23 job of kind of saying, you know, there's a lot of things
24 going on. This scope for our conversation right now is
25 really geared towards expanding these testing documents that

1 are currently accessible in the handbook, making them more
2 evergreen and making them understandable that we don't just
3 test for a closed list of pesticides. We're not -- this
4 doesn't even -- we're expanding, it's not just pesticide
5 residue, it's restricted materials, it could be excluded
6 methods. The list goes on and on and on. It could be in
7 the livestock world, it could be in the handling world.

8 So the framework we did here was really allow for
9 this underdeveloped tool of testing to really be leveraged
10 in many different ways and provide the education behind
11 that. And then we'll get to the other scopes of your
12 conversation later, probably.

13 All right, Nate, go ahead.

14 SECRETARY LEWIS: Yeah, great conversation and
15 bravo to all the work that you all have done moving this
16 forward.

17 I wanted to, I think, add a little bit to Brian,
18 your question in sort of the compliance versus fraud
19 detection realm where, just to use some examples that a
20 certifier could take a sample at a farming operation to
21 determine whether or not a buffer management strategy is
22 effective. So if there are residues, then perhaps that
23 buffer management strategy is not effective. If there
24 aren't residues, perhaps that buffer management strategy is
25 effective. I think that would be an example of a compliance

1 verification-related testing regime.

2 Whereas, when you're in the fraud world, detecting
3 residue and a test itself doesn't necessarily prove fraud,
4 but rather it's more a piece of evidence in the overall
5 investigation, right? And so I think it's just important to
6 be careful about how much we expect to get out of each
7 particular test or testing in general. And there's just so
8 much difference in the weight that you need to put on things
9 when you're dealing with perhaps criminal activity and
10 needing to prove that in court or -- versus making sure that
11 someone's system plan is effective at keeping the integrity
12 of their crop.

13 So I just offer that as a little bit of context
14 there. And I think when we move into the fraud world, we
15 need to be sure that our results are defensible, that that
16 chain of custody is rock solid. Because again, you need to
17 think, will this hold up in court? And so maybe the
18 inspector put the sample in their home fridge before they
19 sent it off. Like, that could be a problem if we have to go
20 to a court proceeding.

21 And so I think just updating this guidance can
22 really help the confidence that certifiers have in their
23 sampling activities. And that's what I think I'm most
24 excited about is that we're just bolstering and giving
25 certifiers the confidence they need to take tests other than

1 just -- not just, but other than catchers, multi-residue
2 pesticide screens. And they really need that support in
3 order to do it.

4 So that's some helpful -- hopefully that's some
5 helpful context. I think I also just wanted to share my own
6 kind of experience with this, that in 2009 is when I was
7 hired at Washington State Department of Agriculture. And
8 when I was working as a certifier there, I was able to take
9 over the residue sampling program. At that time, I believe
10 WSDA was the only certifier doing residue testing of
11 operations regularly on an annual basis. This was before we
12 had a requirement, as Kyla mentioned, that 5 percent of all
13 operations be tested.

14 And so we had that experience as an agency to kind
15 of contribute to the development of that residue sampling
16 rule. And so what we saw when that rule did go into effect
17 is a lot of certifiers made a lot of adjustments. They had
18 to, first of all, find the budget for a whole bunch of
19 sampling activities, which are expensive, not only to test
20 themselves, but sending the inspectors out. They were
21 asking their inspectors to interact with their clients in a
22 completely new way, which was where that chain of custody
23 had to be maintained. They needed to develop relationships
24 with testing labs. They needed to train their staff on how
25 to respond to results.

1 And so I think it made a lot of sense at that time
2 to start with pesticide residue sampling because it was sort
3 of a chewable bite, so to speak. Like we could take a bite
4 of the apple and actually chew that. And then they'd get
5 the certification community around the horn and get some
6 experience under our belts defending those results in
7 compliance actions.

8 All right, fast forward to now. We've got a
9 decade or so of experience under our belt with pesticide
10 residue sampling. It's really time to take another step and
11 take another bite off that apple and go, okay, what other
12 testing can we do? We're comfortable with the
13 arrangements. We're comfortable with having relationships
14 with testing labs, with just adding testing into the
15 certification process. What else can we do?

16 So I think we're doing a really good job and it's
17 timely to bring in some additional testing opportunities for
18 folks. And I'm really excited about the sort of separation
19 of the need for a potential update to the regulation from
20 what we're dealing with here, which is update to guidance.
21 So this guidance, I think, sharpens the point on the current
22 regulation and I'm really, really happy about that.

23 I'm also really happy that we're going to keep the
24 conversation going on are there new regulations we have to
25 put into place so that we can close some gaps, so that we

1 can further support more novel testing approaches, so that
2 we can respond more quickly to excluding contaminated
3 products from the organic marketplace. All those are really
4 good things, but we need to be really careful about when we
5 start tweaking regulations, we need to make sure they're
6 legal, that the USDA has the capacity to stand behind
7 testing results.

8 I think there's a lot of further conversations
9 that we can have there. And should we get to a place where
10 there is an update to the regulation, that gives us an
11 opportunity to update the guidance yet again. And to Kyla's
12 point, most likely if we're going to see a change to the
13 regulation, there will also be an update to a guidance like
14 we saw in SOE.

15 So I'm really happy with where we're at in the
16 process, where if we move forward with the proposal that's
17 before us today, we're not missing out on an opportunity to
18 move the regulation forward because we've kind of separated
19 them in some way and should we get an update to the
20 regulation, we'll be able to come back and make sure the
21 guidance is aligned with them at that point.

22 But I think from my reading and my contributions
23 to this process up to this point, I'm really happy with
24 where this ended up in terms of, yeah, I think the metaphor
25 is sharpening the point of the spear on this tool for

1 compliance verification and as a piece of evidence
2 collection for fraud investigations.

3 CHAIR BRUCH: Thank you, Nate. That was very
4 helpful, your perspective on all of those points.

5 I'm seeing a lot of heads nod there. So yeah, you
6 really kind of honed it in there. This is an omnibus
7 approach, but the idea is really to be a tool that is
8 helpful for the entire community. And at the end of the
9 day, we did overall receive large amount of support from the
10 community in packaging all of the comments on this subject
11 matter in the discussion document. I think it was about 53
12 pages and it was from a diversity of perspectives, this
13 comment round alone, let alone the other comment rounds we
14 had.

15 So are there any other questions on this?
16 Definitely a topic we could discuss about all day long, but
17 it is important to remember the scope of what we're doing
18 here.

19 So the proposal, okay. Well, I'm not seeing any
20 more discussion, Kyla. We do have a motion and that was
21 from subcommittee, but the motion to accept the proposal on
22 residue testing for a global supply chain guidance
23 documents. It was motioned by Amy and it was seconded by
24 Carolyn. And let's see, I believe the voting starts with
25 Nate Lewis.

1 SECRETARY LEWIS: Enthusiastically, yes.

2 CHAIR BRUCH: Love it, thank you. Cat,

3 absent? Okay, we'll move on to Dilip?

4 BD. MEM. NANDWANI: Yes.

5 CHAIR BRUCH: Logan?

6 BD. MEM. PETREY: Yes.

7 CHAIR BRUCH: Corie?

8 BD. MEM. PIERCE: Yes.

9 CHAIR BRUCH: Franklin?

10 BD. MEM. QUARCOO: Yes.

11 CHAIR BRUCH: Kyla?

12 BD. MEM. SMITH: Heck yeah.

13 CHAIR BRUCH: Javier. Absent. Brian.

14 BD. MEM. CALDWELL: Yes.

15 CHAIR BRUCH: Kathryn.

16 BD. MEM. DESCHENES: Yes.

17 CHAIR BRUCH: Carolyn?

18 BD. MEM. DIMITRI: Yes.

19 CHAIR BRUCH: Amanda? Did I get a yeah?

20 BD. MEM. FELDER: Yes.

21 CHAIR BRUCH: I didn't hear you. Okay. I saw
22 your head shake, but I was just getting your verbal -- okay.
23 Thank you. Andrea?

24 BD. MEM. HATZIYANNIS: Yes.

25 CHAIR BRUCH: Allison?

1 VICE CHAIR JOHNSON: Yes.

2 CHAIR BRUCH: And the Chair votes yes. Thank you
3 kindly. I really appreciate it. All right.

4 SECRETARY LEWIS: I'll just for the record, put
5 the vote. Yeah, 13 yes, zero no, two absent, the motion
6 carries.

7 CHAIR BRUCH: All right, wonderful. Back to you,
8 Kyla.

9 BD. MEM. SMITH: Okay, the next is just a run
10 through here of the discussion document, which is going to
11 go through the regulatory changes. I think you can go to
12 the next slide. And Amy, you're going to talk through the
13 first part and then I'll jump in with the last two.

14 CHAIR BRUCH: Yeah, absolutely. And we'll try to
15 -- this is a discussion document. There's still much more
16 conversation to be had with this, but we are going to show
17 you a slide on some next steps. We appreciate all of the
18 community support. I know there was a lot of questions in
19 this document, so we'll try to summarize them as best as we
20 can.

21 Really a derivation from a previous document that
22 we just voted on. These themes really bubbled up to the top
23 in terms of what potential regulation updates are needed in
24 the realm of residue testing. So the first one, as Kyla
25 mentioned, we'll go over, is the exclusion from organic

1 sale. And this in general is summarized by the lack of
2 clarity on whether the detection of a direct prohibited
3 material can or should be excluded from sale as organic.
4 And then also with this subject matter, we were exploring
5 downstream notification. When we turned to public comments,
6 the majority of the commenters supported the discussion on
7 amending the regulation for clarification that intentional
8 application of a prohibited substance results in the removal
9 of the organic label.

10 An amendment would bring the regulation in line
11 with the language. So that's essentially what we're trying
12 to do. OFPA 6511 Section 2112 says one thing, and the
13 regulations are not as comprehensive for what OFPA
14 says. And I really appreciate, there were very extensive
15 comments on that piece. But in general, it looked like the
16 community was overall supportive of that. There was some
17 questions on, you know, how do we prove willful intent? And
18 that's something that we can sure discuss more.

19 But actually the idea this was through a
20 conversation between Kyla and I about a year ago in CACS
21 when we were talking about, gosh, if an inspector actually
22 sees a prohibited substance being applied to a field, do we
23 have to wait until that crop is ready to be harvested and
24 tested? Can we look at understanding the idea that a
25 willful application was made?

1 And I'm going to turn it over to Kyla because just
2 to comment on the two paths, you mentioned there's two paths
3 to get after potentially the same situation, but the path
4 that we're looking here with willful intent could be an
5 expeditious path of enforcement to get a material or a crop
6 out of the supply chain. So Kyla, can you just talk through
7 the non-compliance route versus this route? I know there
8 was a question by a public commenter on that.

9 BD. MEM. SMITH: Yeah, sure. And I would preface
10 this to say that it's quite possible that certifiers are
11 approaching this differently, right? And so, again, all the
12 more reason to clarify this, but I mean, obviously, the
13 exclusion from sale at 671 covers quite adequately the --
14 over the 5 percent of the EPA tolerance. It is a little bit
15 less clear on what to do with Amy's example, and so it could
16 be that some certifiers feel that they can adequately
17 exclude from sale more immediately that crop, whereas the
18 slower compliance path would be to issue a combined notice
19 of proposed suspension and/or revocation depending on the
20 situation in alignment with the compliance process, which
21 also includes the penalty matrix, which is in the program
22 handbook.

23 And then the operation has the opportunity to
24 request a mediation or appeal to the NOP. There's like a
25 lot of due process that's baked into the regulation. And

1 then depending on if they do one of those actions, then if
2 they appeal and what have you, then it goes through the
3 appeal process, and then they could appeal the appeal
4 decision to an administrative law judge. And so there's a
5 lot of -- it's a lot slower to get an operation out of the
6 system using that process. And to say that we would have to
7 go through that process to get the operation out of the
8 system, but we don't -- all the while, that product may or
9 may not make it into the marketplace. So it's just a little
10 bit of a different pathway.

11 CHAIR BRUCH: Thanks for that. That was good
12 clarity there. And I mean, that's kind of the essence of
13 this is to really elevate that there could be
14 inconsistencies and that clarity and matching OFPA with the
15 regulation is what we would derive from an amendment here.

16 Just for the interest of time, and I want to get
17 to discussion, I'm going to turn it back over to you, Kyla,
18 for the final two elements of this document to summarize.

19 BD. MEM. SMITH: Yeah, I think I'll be quick on
20 these. So with the revision to the definition of UREC, we
21 asked, we had proposed a definition, we asked if the
22 stakeholders agreed with the definition, and by and large,
23 most stakeholders said no, and they had some lovely
24 suggestions for us to consider. I mean, I'm glad that we
25 included what's your alternative definition, because they

1 offered them. And so we have more to look at at
2 subcommittee and take pieces apart.

3 So I think in large part, though, there was the
4 recognition that the current definition is not still working
5 for us and not still serving the community, and so looking
6 for continuous improvement in this area, and we have, yeah,
7 lots of alternative definitions that were provided that we
8 can look more at.

9 In regards to the number and cost of sampling,
10 this is specific to the 5 percent of mandated testing, as
11 well as the requirement for certifiers to absorb the cost of
12 periodic residue testing. And I say that in quotes because
13 there are some certifiers that define that periodic residue
14 testing as that more random-based testing and not in
15 response to an investigation or a complaint or something
16 along those lines, and so they absorb the cost for the more
17 random-related periodic residue testing.

18 And then if the testing does occur for a complaint
19 or investigation or as part of a settlement agreement or
20 something along those lines, then they are passing those
21 costs along, then they're not counting them as the 5
22 percent. And so just exploring what are our options here in
23 regards to the expense, because it is a line item for
24 certifiers, and we want to be most efficient with our
25 budget.

1 And so anyway, just thinking about that. And then
2 there were definitely even some comments that were
3 suggesting that we look at that 5 percent and that many
4 certifiers certify, in large part, very low-risk operations,
5 and they're still mandated to do the 5 percent testing or
6 testing the 5 percent of their operations. And again, is
7 that really serving the community as a whole or can we
8 collectively better maximize our resources in different ways
9 and really be testing more for that fraud-based type of
10 approach versus the compliance-based situations that Nate
11 was getting into earlier.

12 So I think I'll leave it there. So I think lots
13 more to unpack in that piece than the others. The other two
14 areas, I think, seem a little bit more straightforward, but
15 I definitely feel like that last piece, we might need to
16 unpack a bit more.

17 CHAIR BRUCH: All right, that was the overview. I
18 wanted to open it up to the Board for further
19 discussion. We kind of have an idea of our next steps
20 listed. Kyla alluded, there's maybe some opportunities for
21 a proposal on the first and second components of this
22 discussion document and more to explore on the cost and
23 sampling piece. But any discussion here or any public
24 comments that stood out that we'd like to elevate?

25 Go ahead, Nate.

1 SECRETARY LEWIS: Thanks, all. I had a question
2 and then a comment. I noted in the proposal we just passed,
3 there was acknowledgement of public comments related to
4 making the results of the sampling programs public. And I
5 was curious if that -- I'm so happy that that was
6 acknowledged. I realize that that's a challenging area, but
7 I'm curious if that is within the regulation update
8 conversation, if there's a need for an update to that part
9 of the regulation in order to clarify it, or is that better
10 suited in guidance around making those available? Then I
11 had a comment after. If you understood the question, I can
12 rephrase it, but --

13 BD. MEM. SMITH: I want to just clarify, you're
14 not talking about the operation notifying the downstream
15 buyer. You're talking more about the -- yeah.

16 SECRETARY LEWIS: Yeah, 670 -- 670, results of all
17 analysis.

18 BD. MEM. SMITH: Oh, yeah, yeah, yeah, yeah, yes,
19 yes, thank you, yeah. Yes, I think we will include that in
20 the regulatory part. And I think there just needs to be a
21 connection. In my read that I think there just needs to be
22 a connection between what's in 670(f) and the accreditation
23 requirements at 504(b) blah, blah, blah. I don't remember
24 the exact reference, but the one that requires certifiers
25 make this information public. I think if 670(f) pointed to

1 that, maybe that would solve it. So that's where I'm
2 currently thinking, but yes, I think we would cover that in
3 the regulatory part. Thanks for remembering me about that,
4 yeah.

5 SECRETARY LEWIS: I just wanted to highlight that
6 comment because we've been hearing that. For folks who are
7 eager to amplify how great organic is and how free of
8 residues it is, having the access to data and that we're
9 working to police ourselves and continuous improvement is
10 really helpful.

11 And then a suggestion for the cost. I just want
12 to -- I love finding the little parts of the rule that we
13 don't really focus on, but might provide solutions. So
14 205.640 is what defines the cost and how we pay fees for
15 accreditation. And so there's a whole list of things that
16 run up your bill. And perhaps we could suggest a credit
17 section and costs related to sampling could be a credit to
18 certifiers in their accreditation bill.

19 So it kind of like, instead of like asking for
20 money from Congress to pay for sampling, we reduce the cost
21 of accreditation by the amount, again, I don't know if this
22 is legal, I'm not a lawyer. That's why it's so easy to come
23 up with good things and good ideas. But I just know that
24 there is a section that describes how much a certifier has
25 to write a check to the USDA for if we're trying to share

1 the burden of the cost of -- that might be an area to look
2 at for that part of it.

3 BD. MEM. SMITH: Okay, yeah, thanks. Good thing
4 we have a lawyer on the subcommittee.

5 VICE CHAIR JOHNSON: Yeah. I decline to comment.

6 CHAIR BRUCH: Thanks for those points, Nate. Go
7 ahead, Dilip.

8 BD. MEM. NANDWANI: Thanks, Kyla and Amy. You
9 know, before this presentation, I was scratching my head
10 about what is this about residue testing. And you have
11 really nailed down and it's very well in-depth presentation.
12 So I learned a lot about this.

13 A couple of things, kind of a comment, and but
14 before that, export the 5 percent mandated testing. What
15 can you tell a little bit more about? Because if it is a 5
16 percent, is it per shipment, per commodity? When the
17 shipment arrives at the ports, you know, from the importers,
18 something, whatever you guys have discussed, if you can
19 share a little bit.

20 Second point I want to say about from the Nate
21 just mentioned, you know, the cost. Yes, it's going to be a
22 burden, particularly from a small farmer's perspective. I
23 would like to just add into that. So thank you.

24 BD. MEM. SMITH: Yeah, I think I can cover both of
25 those. So the 5 percent is currently in the regulations.

1 It requires certifiers test 5 percent of their certified
2 operations. So, you know, you take whatever, your total
3 certified operations, 5 percent of that, that's how many you
4 have to do on an annual basis. And, you know, some
5 commenters have also brought this up in the past that if a
6 certifier takes multiple samples at an operation, maybe it
7 is for this like continued oversight mechanisms, you know,
8 like we're really wanting to keep an eye on a particular
9 operation, that still is only counting as one because it's
10 on that operation. It's not the number of tests.

11 So there's been some, yeah, definitely some
12 comments and conversation around, again, like, is this 5
13 percent of the operations still working for us? Like,
14 should we be really looking at that? And then, yes, Dilip,
15 duly noted around the cost and right now what's being --
16 what has been being explored is passing on the cost related
17 to residue testing in the case of like a complaint or an
18 investigation or something like that where there -- where it
19 is to an operation that is higher risk, that they're, you
20 know, where we are needing to have this additional oversight
21 mechanism.

22 And I know that some certifiers do have that as
23 part of their fee schedules to charge operations for that
24 additional oversight and whether or not that's like a flat
25 fee or an hourly fee or what have you, the certifiers do

1 that differently. And, you know, each certifier sets their
2 certification fees themselves and they're all different, and
3 some certification agencies have sort of, when this -- I
4 mean, over a decade ago, like when this came out, they
5 increased their certification costs for everybody because
6 this was sort of going to be a need to absorb these costs
7 and -- like across the board, right?

8 And now we are noticing that there are definitely
9 operations that costs us more to certify them because we
10 have to do that additional oversight mechanism. And so it
11 seems unfair for operations that are lower risk to subsidize
12 those that are higher risk. And so just, again, I know that
13 certain certifiers make those accommodations in their fee
14 schedule and we by no means want to have additional costs to
15 lower risk operations, smaller operations. And that's not
16 what we're proposing, but certainly want to adequately --
17 yeah, appropriately apply these costs to those who just
18 inherently -- it takes more for a certifier to certify them.

19 CHAIR BRUCH: Yeah and I would like to --

20 BD. MEM. NANDWANI: Sorry, go ahead.

21 CHAIR BRUCH: Oh, sorry about that, Dilip.

22 Yeah, just to jump in here, you know, I think we
23 need to also look at direct and indirect costs. There's a
24 direct cost to certification, but if we aren't vigilant with
25 oversight and enforcement, there's other direct costs that

1 impact farmers if we're not doing the verification that's
2 needed as the NOP update said with additional oversight.

3 With the West African directive, they are finding
4 things and they're getting it out of the supply chain, which
5 does impact the markets that farmers participate in. So we
6 need to look at it. I think from a real macro standpoint,
7 there was a comment on the testing and the costs that I
8 really thought -- it resonated with me. I'd just like to
9 read it real quick.

10 It says, testing is a significant cost for
11 certifying agents. And we all, I think, can understand
12 that, relate to that. It says, and realistically, most
13 certifying agents don't account for the cost of enforcement
14 when developing their fee structure. It's just the cost of
15 certification, the OSP management. We need to look at it
16 maybe a little bit differently for that enforcement
17 component.

18 The cost of delivering certification service
19 usually assesses the cost associated with the OSP,
20 inspection, final decision, and associated third-party
21 certification costs. Compliance oversight is an important
22 responsibility that certifiers are performing that's not
23 captured currently in that fee structure, and I think that
24 really resonates to me as a farmer.

25 We might think these costs are high for

1 certification, but I would attest what they're protecting at
2 the end of the day. That's the bigger thing that I think we
3 need to also internalize here. So the risks are real, and
4 we just need to be on our toes and proactive in this
5 verification assessment, because there are those other costs
6 that impact farmers outside of certification. We feel it in
7 our markets.

8 BD. MEM. NANDWANI: Of course, yeah. That helps a
9 lot, Amy. I really appreciate your expertise on this. I
10 learned a lot today about this, a lot of details to this.
11 So thank you, Amy.

12 CHAIR BRUCH: Yeah, there's so many more comments
13 to communicate with everybody, but Kyla and I will
14 definitely do our diligence in going through them. And I
15 think we've seen all sides of the spectrum here when it
16 relates to the regulation updates. And we do take every one
17 of them very seriously, and we'll try our best as the next
18 steps indicate of taking some of these elements to a
19 proposal based on that feedback.

20 Is there any other questions or comments in this
21 section? Thanks for hanging with us. I know we did go a
22 little outside of our time element here, but I think the
23 conversation and review was definitely worthwhile.

24 I am not seeing anything, Kyla. Do you have
25 anything else that you'd like to cover?

1 BD. MEM. SMITH: Nope, and I think that rounds out
2 CACS.

3 CHAIR BRUCH: Excellent. Thank you for your
4 leadership and your partnership on these challenging
5 issues. And with that, I'm going to propose we all take
6 just a 10-minute break to kind of refresh ourselves for the
7 final segment here. We will return back at five after the
8 hour. I guess that'd be 11 minutes.

9 (Recessed at 3:54 p.m.; to reconvene at 4:05 p.m.)

10 CHAIR BRUCH: All right, everybody, it's five past
11 the hour. We are in our last segment of the final day, so
12 welcome back. We are going to be moving into a review of
13 the work agenda. We have no deferred votes, so we'll skip
14 over that. And Michelle and Andrea have some slides that
15 we're just going to show here to see what areas we are
16 covering.

17 CACS, we have on track here, consistency in
18 organic seed use. We appreciate the public comments that we
19 did receive on this subject matter, and the plan is to bring
20 that forward in our fall meeting, including risk-based
21 certification for a proposal, which we discussed today, and
22 the residue testing for global supply chain regulation
23 review materials. We're planning on having a document on
24 excluded methods and a proposal on our research priorities
25 in crops. We will be looking at that synthetic compost

1 feedstocks, and there is a TR that should be available on
2 that. If not -- I guess, if it's not already on the
3 website, it'll be soon, to inform public comments. We have
4 Pear Esser will be returning for a proposal, and then our
5 crop sunset substances we'll be voting on.

6 In livestock, we have chlorine materials, it's
7 petitioned. We have a new work agenda item that we got
8 approval on. That will be in a discussion document form,
9 integrating livestock and agroforestry crops, and then we
10 also have the 2027 livestock sunsets that we reviewed
11 already this meeting, and we'll be voting on them next
12 meeting.

13 Handling, we have chitosan, it's petitioned. We
14 have L-malic acid reclassification. That'll be returning as
15 a proposal, and then our Handling sunset substances.

16 And then the policy development subcommittee will
17 be debuting some updates to the PPM. So that's what we have
18 on deck.

19 I know there's another slide. Nate was giving us
20 a tally as we were progressing through our review of our
21 sunset materials, but before we get to that, I see Kyla's
22 hand. Go ahead, Kyla.

23 BD. MEM. SMITH: Yeah, I just wanted to
24 acknowledge that there were some substances that had been
25 identified for an annotation change, and so we heard from

1 the community wanting better transparency on that, and so
2 once those get talked about more in subcommittee and final
3 decisions get made on like a yes or no, we will be sure to
4 update the work agenda to capture those additional items so
5 that it's clear that additional proposals will be part of
6 the meeting packet at the fall. Thanks.

7 CHAIR BRUCH: Thanks, Kyla, for that update.
8 Appreciate that.

9 All right. Nate, I'm just going to turn it over
10 to you. You've been taking the tally, and we have the items
11 on the board here. I'm just going turn it to you for a
12 final explanation on this.

13 SECRETARY LEWIS: Yeah, so as we've mentioned and
14 as we've gone through our sunset review presentations, we
15 identified which substances might be eligible for a group
16 vote. I coordinated with Michelle, and we got this live
17 action chart up here about, and so this really just lists
18 the substances that the leads identified as eligible for
19 inclusion on that group vote list for the fall.

20 So what we'll see happen over the summer is in
21 subcommittee, all of those sunset reviews will turn into
22 final recommendations that we'll be bringing forward to the
23 fall, and it's really at that juncture that each
24 subcommittee will assemble a potential group vote for the
25 fall. So again, that will be reports out of subcommittee

1 and included in the materials for the fall meeting, and then
2 at each subcommittee section of the fall meeting, the Board
3 members will have the opportunity to either agree with that
4 grouping or remove substances if new information comes
5 forward.

6 So again, just in the spirit of transparency and
7 clarity, we're putting this up there for the groups of
8 substances that are eligible for that group vote approach,
9 and we'll see in the fall if any of them -- if we do in fact
10 take any group votes, whether it's worthwhile or if more
11 information comes out that warrants removing them from the
12 group vote and into an individual discussion.

13 CHAIR BRUCH: All right, thank you, Nate, for that
14 summary there. More work to be done in the summer on that,
15 so stay tuned to meeting notes.

16 Okay, I believe we're ready for other business
17 now. Wanted to open it up to any board member to bring up
18 any items that need attention or that you want to
19 discuss. I know we had some lively conversations in the
20 research priorities, so if there's any of those themes to
21 bring up or markets or anything else.

22 Logan, I see your hand.

23 BD. MEM. PETREY: Hey, thank you. So yeah, going
24 through the public comments that we received, we did get
25 some letters on the fulvic acid, and we will be going in

1 crops looking at that, also working with the NOPC and what
2 direction that needs to have. So I don't necessarily have
3 the discussion here, but we'll be looking at it in the Crops
4 subcommittee.

5 CHAIR BRUCH: Thank you, Logan. I really
6 appreciate you elevating that.

7 Allison, go ahead.

8 VICE CHAIR JOHNSON: Thanks, Amy. I just wanted
9 to, again, appreciate everyone's flexibility. This was an
10 unusual lead up to the meeting. I thought everyone handled
11 it really gracefully, both on the Board and through public
12 input. We still got excellent quality and quantity of
13 comments, and I feel like from the discussion throughout the
14 week, it's clear that everyone was able to make really good
15 use of those comments, even with the short timeline.

16 And I wanted to acknowledge that there were a few
17 comments about how the Board treats public commenters and
18 oral comments. There was concern that farmers hadn't
19 received the level of respect that they should when they
20 commented, and from where I sit, it seemed like it went
21 really well this time. Great discussion, and also the Board
22 was really good about focusing on getting more information
23 rather than having a back and forth with commenters.

24 So hope to hear more from the community about --
25 from everyone else's perspective, if you share that

1 view. But overall, I thought everyone was really respectful
2 and engaged in thoughtful dialogue. So thank everyone for
3 that, and thank the community for raising that concern. We
4 appreciate it.

5 CHAIR BRUCH: Allison, thanks for bringing up that
6 point. We definitely want to receive feedback there. I
7 believe our community has a really great level of trust that
8 we have the candor to deliver the tough message when that
9 needs to be done, and I hope we had the space, and it seemed
10 like it to me, we had the space for that to happen in that
11 exchange. So love to have some more feedback on that. But
12 all perspectives are important. That makes us stronger at
13 the end of the day. It really does.

14 And I do love that farmer participation. Over the
15 years, I think it's just, as my term's been on, it's just
16 getting better and better. So hopefully reaching out and
17 getting those voices heard as certificate holders, as we had
18 in some of our deliberations, certificate holders' voices
19 really need to be heard in that equation when we're
20 reviewing and stress testing some of these new thoughts.

21 All right. Any other things to bring up? We have
22 gone around the world and back in the last three days on
23 lots of important issues to organic production. If not, I
24 have one thing I wanted to just elevate here. In previous
25 public comments, we've heard the importance of the NRCS

1 programs that are available. And this is a great flyer,
2 communication, high level, just to highlight some of the
3 options that are available. We have the EQIP, the
4 Environmental Quality Incentives Program. We have the CSP,
5 Conservation Stewardship Program. And then we have new NRCS
6 Organic Transition Initiative, OTI.

7 If anybody needs any more information, there's a
8 QR code that you can click in the corner. Otherwise, reach
9 out to me. I am a participant in, I guess, the top two
10 programs. And then there is a practice standard, the 823
11 Organic Management Practice Standard that is underneath the
12 OTI initiative. And that is something that's really, really
13 important to these new transition farmers.

14 We heard a lot of enthusiasm from what TOPP is
15 doing. And I welcome folks to really look hard into what
16 NRCS is offering in terms of the Organic Transition
17 Initiative and the 823. So please make sure the word gets
18 out on that.

19 Allison, yeah, go ahead.

20 VICE CHAIR JOHNSON: I'm picking up Kyla's new
21 slogan everywhere. I forgot the most important
22 acknowledgement before about making this meeting happen.
23 The NOP staff, you all did so much work behind the scenes to
24 make sure that we got here and this meeting went as smoothly
25 as ever.

1 So sorry, I forgot that in the first place. That
2 was supposed to be the first line. And thank you all, we
3 really appreciate you.

4 CHAIR BRUCH: Absolutely, very important. Thank
5 you, Allison. We really appreciate everything that went in
6 to making this meeting happen. And it ran smoothly despite
7 a few challenges that were thrown at us. So thank you.

8 Andrea, go ahead.

9 BD. MEM. HAZIYANNIS: Just wanted to give a shout
10 out to the new members and the existing members, helping to
11 mentor us and get us prepared for our first meeting,
12 especially under unusual circumstances. We appreciate all
13 the support and guidance and extra phone calls.

14 CHAIR BRUCH: You guys crushed it. Yeah, you
15 really hit the ground running for sure, so thank you. I was
16 expecting nothing less. We put you up on the spot at times,
17 but you performed wonderfully. And yeah, nicely done.
18 Welcome to the team. So happy to have your voice as a part
19 of our Board process.

20 Anything else in this segment? All right, we will
21 move on to the next segment then, which is closing
22 remarks. And I see we have Christopher Purdy on with
23 us. And I would like to extend an invitation for yourself
24 to offer any closing remarks or perspectives, Christopher.

25 DEPUTY PURDY: Thank you, Amy, very much. I've

1 just got a few things to say. I want to thank our listeners
2 at last count, we had about 115, 116 listeners from the U.S.
3 and around the globe. I appreciate you staying with us for
4 15 hours of work this week. And last week, we had 10 hours
5 of listening sessions as well.

6 I want to appreciate the recognition of the NOP
7 staff and their work. Erin Healy and Michelle and the rest
8 of the team really have put a tremendous amount of work into
9 the meeting to make sure it flowed smoothly. The agenda was
10 just incredible. And most of all, I want to thank the NOSB
11 Board members, led by Amy and Allison, for your incredible
12 focus, time, commitment, and endurance. It is incredible to
13 see everyone remain engaged during every minute of this
14 meeting. It's impressive to see, and the discussion was
15 extremely illuminating.

16 I didn't realize you had to be a scientist as well
17 as a farmer and rancher to work in the organic industry.
18 But the background that you brought to the meeting was
19 extremely helpful. So really, that's all I want to say, is
20 thank you. And hopefully, we'll see you in the fall. And
21 we look forward to the discussions between now and then.

22 CHAIR BRUCH: Thank you so much again,
23 Christopher. Welcome to your first Board meeting. Thanks
24 for your kind remarks. And we really look forward to
25 collaborate with you in the future. You and your team. All

1 right.

2 Well, I have a few closing remarks that I'd like
3 to highlight as well. I want to say thank you to every
4 single one of my board members, the NOP staff, and all of
5 you Zooming in from the organic community. As I've been
6 reflecting on this week's deliberations, I love how deep in
7 the weeds we get with each subcommittee's review and each
8 material discussion.

9 As we consider the future of compost or the impact
10 our toolbox has on maximizing animal welfare, I'm reminded
11 that it's exactly this type of detail that makes organics so
12 valuable to consumers, so trusted. Organic consumption in
13 the US represents 40 percent of the global demand for
14 organic food. That's pretty cool that U.S. farmers have
15 that sort of local market opportunity. That's so much
16 demand for clean, authentic, traceable food wanted by U.S.
17 consumers can be grown in the U.S. represents a unique
18 opportunity.

19 As I mentioned in my opening remarks, organic is
20 one of the brightest free market opportunities we have in
21 the U.S. Farmers can get a hand up and can revitalize their
22 local economies. Consumers get the chance to support those
23 farmers with their food dollars. Literally, everyone wins.
24 When I think about how incredible it is to have the federal
25 government as a partner to help enforce our standards and

1 maintain that consumer trust, I just want to emphasize what
2 a good deal the National Organic Program is for all of us
3 taxpayers.

4 \$24 million runs the National Organic Program, and
5 it turns yields of over \$70 billion of sales. As one
6 commenter said, that's one incredible ROI. We heard from
7 growers across the country that they are eager to have a
8 fair playing field when it comes to organic integrity. It's
9 incredible how successful the USDA Organic Program has
10 been.

11 When I hear that we need more oversight in our
12 efforts to maintain integrity, I look at that as a huge
13 success story. Our industry is growing, good people are
14 building trust across the supply chain, and we need the
15 infrastructure and tools to do it. Increased testing is one
16 of those tools.

17 It was so affirming to hear about the successes of
18 our TOPP program, which is actively expanding this market
19 opportunity to farmers across the country, including Alabama
20 and Texas. As we look at investment that makes sense and is
21 going to yield results, the Organic Market Development Grant
22 combined with TOP are two incredibly successful examples of
23 how USDA is supporting American growers and giving them a
24 hand up, not a handout.

25 I can't wait to continue this work through the

1 next six months. I'm so impressed with our new board
2 members, and I am just equally just honored to serve with
3 everybody on our Board and look forward to seeing you all in
4 Nebraska this fall. Welcome to my home state.

5 And with that, I think we are at the end of our
6 spring 2025 NOSB meeting. So really appreciate everybody
7 tuning in and staying on with us, and thanks for this moment
8 together.

9 VICE CHAIR JOHNSON: Thanks, Amy. It's been
10 requested that we do a photo.

11 CHAIR BRUCH: Oh, thanks for bringing that up,
12 Allison. That's why we work together well. You just pick
13 up the little pieces that I missed. Thank you.

14 VICE CHAIR JOHNSON: Michelle reminds me.

15 CHAIR BRUCH: Okay, well, I'll turn it over to
16 Michelle then to coordinate this group photo.

17 (Whereupon, at 4:23 p.m., Eastern Standard Time, the
18 virtual hearing in the above-entitled matter was closed)

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1 CERTIFICATION

2
3 This is to certify that the attached proceeding before the:

4 NATIONAL ORGANIC STANDARDS BOARD

5 IN THE MATTER OF: SPRING 2025 NOSB BUSINESS MEETING Day 3

6 PLACE: Zoom for Government

7 DATE: May 1, 2025

8
9 was held according to the record, and that this is the
10 original, complete true and accurate transcript which has
11 been compared to th *Elaine M. LaRosee* plished at the hearing.12
13 _____
14 Elaine M. LaRosee, CDLR15 Official Reporter
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