

UNITED STATES DEPARTMENT OF AGRICULTURE  
AGRICULTURAL MARKETING SERVICE (AMS)  
NATIONAL ORGANIC PROGRAM (NOP)

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MEETING OF THE NATIONAL ORGANIC  
STANDARDS BOARD (NOSB)

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TUESDAY

APRIL 27, 2010

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The National Organic Standards Board convened at 8:00 a.m. in the Heidrick Ag History Center located at 1962 Hays Lane, Woodland, California, Daniel G. Giacomini, Chairperson, presiding.

MEMBERS PRESENT:

DANIEL G. GIACOMINI, Chairperson

TRACY MIEDEMA, Vice-Chairperson

TINA ELLOR, Secretary

STEVE DeMURI

JOE DICKSON

JAY FELDMAN

BARRY FLAMM

JOHN FOSTER

WENDY FULWIDER

JENNIFER M. HALL

KATRINA HEINZE

JEFFREY W. MOYER

ANNETTE RIHERD

JOE SMILLIE

STAFF PRESENT:

MILES McEVOY

JUDY RAGONESI

VALERIE FRANCES

ARTHUR NEAL

MARK BRADLEY

LARS CRAIL

SHANNON NALLY

DR. KERRY SMITH

DR. LISA BRINES

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

8:03 a.m.

CHAIRPERSON GIACOMINI: We'll call the meeting back out of recess, and today is our day for public comment. I would restart by reading part of our policy statement regarding public comment. We've already gone through the sign-up process, so we'll skip that, but every person will be given five minutes to speak, unless otherwise indicated by the Chair. Persons must give their name and affiliation for the record at the beginning of their comment. A person may submit a written proxy to the NOSB or NOP requesting that another person speak on his or her behalf. The proxy request should be submitted in writing to the Executive Director, and include the --

(Off the record comments.)

CHAIRPERSON GIACOMINI: So, you get five minutes, you give your name and affiliation at the beginning of your comment.

1 Proxies should be submitted to the Executive  
2 Director, include the name of the presenter  
3 and topics, who will be for the proxy, and  
4 limited to five minutes. No person will be  
5 allowed to speak during the public comment  
6 period for more than 10 minutes, unless  
7 otherwise indicated by the Chair. Individuals  
8 providing public comment will refrain from any  
9 personal attacks, and from remarks that would  
10 impugn the character of any individual.

11 We have nine -- as a count from  
12 yesterday, we have, and I don't know if this  
13 is a new list or not, we have 96 people signed  
14 up for public comment today. At five minutes  
15 per person, 12 people an hour, that is eight  
16 hours of solid public comment. At six minutes  
17 per person, that goes to nine and a half hours  
18 of public comment, so I am a complete believer  
19 that this is one of the most important things  
20 we do on this Board as a practice of our  
21 American democracy in the organic world. I  
22 think the only thing more important is the

1 written public comment, which is where the  
2 people who can't come to the meeting have  
3 access to the Board. After that, this is the  
4 most important, at least in my mind.

5 I don't want to have to go to a  
6 three-minute cutoff, but I would like everyone  
7 to be aware of what the time constraints for  
8 today do mean, both from those presenting when  
9 your time limit is called and up, and Board  
10 members for asking questions. I don't want to  
11 put any kind of restrictions or constraints on  
12 anyone, but I want everyone to be aware of  
13 what that time situation implies.

14 So, do we have any other  
15 statements or comments, or anything? Valerie,  
16 are we good to go this morning? Anyone else  
17 have anything for us before we get started?

18 Oh, we have -- thank you. Okay.  
19 We do have one statement, I believe from the  
20 Materials Committee or the Joint Committee, I  
21 believe that hopefully will address some of  
22 the issues that you'll be talking about today.

1 MS. HEINZE: The Joint Committee  
2 wants to thank everyone who submitted written  
3 public comment. We met last night. Well,  
4 we've met many times over the last few in  
5 reaction to the public comment, so we met last  
6 night and voted on a new second sentence for  
7 the definition of chemical change. We're  
8 changing -- getting this ahead of time because  
9 we know that classification of materials  
10 requires some thinking, so we wanted to get it  
11 up there and in front of folks who have put so  
12 much thought on this topic, so the Joint  
13 Committee voted unanimously to support the  
14 second sentence to address the public comment.

15 I will read it, but, again, we  
16 wanted everyone to have a chance -- I hope  
17 you're all writing it down so you have time to  
18 think about it. We would love some public  
19 comment on it today, but, again, we'll be  
20 presenting it and discussing it more broadly  
21 during my presentation tomorrow. So, if you  
22 have particular thoughts that we should be

1 aware of, that would be good, as well.

2 The second sentence is,  
3 "Processing is defined in 205.2 of  
4 Agricultural Products using materials allowed  
5 on the applicable section of the National  
6 List, 205.601 for crops, 603 for livestock,  
7 605-606 for handling, does not result in  
8 chemical changes that applies to  
9 classification of materials."

10 Our intent with this sentence is  
11 two-fold. One, we heard a ton of public  
12 comment in November that our original  
13 definition for chemical change, which was the  
14 first sentence, went too far, and would have  
15 classified organic agricultural inputs that  
16 had been processed with non-synthetics, or  
17 synthetics, or even other agricultural inputs  
18 using lab processes would have classified  
19 those as synthetic, so we needed to address  
20 that. So, then we came up with a sentence to  
21 do that. Then we got public comment that said  
22 that went too far, and would have allowed

1 mixing if non-synthetics in crops and  
2 livestock, so this is our attempt to address  
3 that. So, again, wanted you to see it, so you  
4 had time to think about it. Thanks.

5 CHAIRPERSON GIACOMINI: Thank you.

6 So, that, hopefully -- we tried to deal with  
7 the majority of the written public comment.  
8 We'll see how that satisfies the oral. Also,  
9 I apologize right now. I'm sure there will be  
10 names that I will completely and totally botch  
11 today, whether from unfamiliarity, to  
12 tiredness. When you deal with this long of a  
13 public comment, it becomes a bit of a, for  
14 lack of a better term, a time warp, so when  
15 we're dealing with our jump to the left, and  
16 step to the right, it sometimes could be  
17 possible. And someone with the last name of  
18 Giacomini, I went through almost 20 years of  
19 school with the first day of class my name was  
20 Dan G, here, so I understand fouling up names,  
21 and I apologize for it, but it's probably  
22 unavoidable. So, anything else before we



1 start? Valerie.

2 MS. FRANCES: Just a reminder, for  
3 those of you who do, or do not know the drill,  
4 when you're called you're on deck, and if you  
5 have written materials, bring them then,  
6 because I can't handle stacks of written  
7 materials and figure out whose is what. So,  
8 just when you're on deck be ready, and the  
9 person who is up there will be talking anyway.  
10 You'll be next, and I'll pass things out. All  
11 right?

12 CHAIRPERSON GIACOMINI: Also, for  
13 our five minutes, we have a one-minute sign,  
14 and a stop sign. And I believe the buzzer  
15 will also go with the stop sign, so in case  
16 you're so involved in your public comment,  
17 hopefully, that just the buzzer will be enough  
18 to pull you back to reality of the world.

19 So, as we start, Peggy Miars from  
20 CCOF is first, with a proxy, and Alexis  
21 Randolph is on deck with a proxy, and Gary  
22 Middleton in the hole.

1 MS. MIARS: Good morning. I do  
2 have a proxy, however, I doubt that I'll use  
3 it. I'm Peggy Miars, Executive Director of  
4 California Certified Organic Farmers. CCOF  
5 represents more than 2,100 certified organic  
6 operations, and about 350 individual  
7 supporting members. We certify about 80  
8 percent of the organic farmland in California.

9 Those of you who have been on the  
10 Board have heard me over the last couple of  
11 years at each meeting urge this meeting to be  
12 held on the West Coast. So, I've waited a  
13 long time to say this, welcome to the great  
14 State of California. I understand this is the  
15 first time the NOSB has met in California for  
16 about 10 years, so we're glad to have you  
17 back.

18 We've excited to have you here  
19 because California is so critical to the  
20 organic industry. According to the National  
21 Ag Statistic Services 2008 Organic Production  
22 Survey, nearly 20 percent of the nation's

1 certified organic farms are here in  
2 California, and our state produced over \$1.1  
3 billion of organic ag products in 2008, which  
4 represents more than 36 percent of US organic  
5 production.

6 I think I've got a different  
7 audience here than you usually see in  
8 Washington, D.C., and I encourage you to take  
9 this road show, excuse me, this show on the  
10 road around the country.

11 (Laughter.)

12 MS. MIARS: Well, maybe it's a  
13 road show, I don't know, to expose the NOSB to  
14 people who would not otherwise be able to trek  
15 to D.C. And, as you know, at these meetings,  
16 we typically hear from certifiers, consumer  
17 groups, manufacturers, ingredient suppliers,  
18 and so forth, and then the occasional farmer.  
19 And I've heard Board members say how much you  
20 appreciate hearing from farmers, from the  
21 people who are actually impacted by many of  
22 the decisions that we make. So, CCOF has

1 encouraged our members to participate in this  
2 meeting, and we encouraged them to submit  
3 written comments, which I know they did.

4 We've encouraged them to sign up for public  
5 comments, which I believe they did, and we  
6 encouraged them to just simply show up and  
7 watch the proceedings, because it's a  
8 fantastic learning experience. And I know  
9 that I've seen some CCOF members here who I  
10 have not seen at NOSB meetings before.

11 In fact, looking out at the  
12 audience, I'd say probably half of the faces  
13 are ones that I've never seen at an NOSB  
14 meeting before, so I think that's fantastic.  
15 And, also, you'll see the majority of CCOF's  
16 office staff here today, because it is such a  
17 great experience. They'll be here tomorrow,  
18 as well. They can see the transparent NOSB  
19 process, and it's a great experience seeing  
20 the big picture of organic, and it gives their  
21 jobs context.

22 We want to invite Board members

1 and everyone else here in the room to join  
2 CCOF at our Welcome to California Reception  
3 tomorrow night in the museum, which is across  
4 the lobby. I'm sorry, I keep forgetting what  
5 day it is. I thought it was Wednesday, or  
6 Monday, I don't know. It is tonight, 7  
7 tonight. Okay.

8 So, now on to comments regarding  
9 an actual agenda item. We at CCOF are pleased  
10 to see the Sunset Review Process being  
11 addressed for clarity, since there seems to be  
12 different opinions about what Sunset actually  
13 means. We support the Policy Development  
14 Committee's Option 3, the Sunset fees at a  
15 hybrid approach. We agree that industry  
16 should bear the burden of proof that a  
17 material should remain on the National List,  
18 and that the NOSB should bear the burden to  
19 show that materials should be removed from the  
20 list. We also agree that synthetics should not  
21 be easy to get on the list, nor should they be  
22 easy to keep on the list.

1                   And, lastly, in response to the  
2                   Committee's question about annotations, we  
3                   believe that the NOSB should be able to revise  
4                   annotations for listed materials during the  
5                   Sunset Process. Thank you so much for your  
6                   attention.

7                   CHAIRPERSON GIACOMINI: Any  
8                   questions for Peggy? Seeing none, thank you.

9                   MS. MIARS: Thank you.

10                  CHAIRPERSON GIACOMINI: Alexis  
11                  Randolph, Gary Middleton on deck, Grace  
12                  Marroquin in the hole.

13                  MS. RANDOLPH: Good morning. I'm  
14                  Alexis Randolph from QAI Organic Certification  
15                  Agency in San Diego, California, and I'd like  
16                  to thank the National Organic Standards Board  
17                  for this opportunity to provide comments.  
18                  This is my personal first opportunity in front  
19                  of the NOSB, so I'm very grateful for that.

20                  A good chunk of the majority of my  
21                  comments are going to be about the  
22                  classification of materials. QAI appreciates

1 the Joint Materials and Handling Committee's  
2 continued work on this very complex issue. We  
3 do feel that the majority of our questions  
4 raised at public comment in 2009 have been  
5 answered with the new guidance document.

6 Because of the new definition  
7 which was just posted, I'm going to withhold  
8 many of my comments this morning, and then  
9 take that into consideration, submit written  
10 comments later if I feel it's necessary.

11 We did want to draw the Board's  
12 attention to the public comment submitted by  
13 Oregon Tilth in writing previously, as well as  
14 others. It sounds like the NOSB took those  
15 comments very seriously, and we appreciate  
16 that. We recognize the Committee has stated  
17 that the term "significant" and "insignificant  
18 level" still need defining, and we support  
19 that effort. QAI already uses this NOSB draft  
20 proposal as a tool for reviewing materials,  
21 and we find it to be very effective.

22 Before the definition was reposted

1 this morning, our intent was to encourage the  
2 implementation of the Classification of  
3 Materials Policy and Guidance document  
4 provided it was restricted for the use of  
5 handlers' scope only under the NOP. We would  
6 still like to encourage the implementation of  
7 this policy, specifically for handlers at this  
8 time. And, of course, we'll reevaluate the  
9 definition when time allows. It's a little  
10 bit tough being second speaker, didn't have  
11 time to do that.

12 I'll conclude my comments on the  
13 materials at that point, and move on to the  
14 discussion document on livestock stocking  
15 densities. We are very supportive of the  
16 Livestock Committee's concern for animal  
17 welfare, and intentions to bring clarity to  
18 certain concepts of the regulation, such as  
19 natural behavior. As a certifier, detailed  
20 regulatory requirements are always welcomed.  
21 They allow certifiers to verify compliance to  
22 the regulation, rather than debate the intent



1 of the regulation.

2 At this point, however, we do not  
3 feel enough data regarding the current  
4 stocking rates in the US have been collected  
5 or analyzed by the NOSB to determine the  
6 impact on the organic industry of implementing  
7 the stocking the way it's being discussed.  
8 Based on the US-Canada Equivalency Agreement,  
9 certifiers have already begun the process of  
10 collecting this data, and QAI asks the NOSB to  
11 allow certifiers ample time to finish this  
12 process, and provide data to the NOP for  
13 analysis.

14 Regarding the discussion document  
15 on the USDA's seal and the Natives Organic  
16 labeling category, QAI fully supports  
17 regulatory updates that would help consumers  
18 distinguish between the organic and native  
19 organic claims. However, QAI disagrees with  
20 the USDA's seal or variation of the seal on  
21 native organic products to accomplish this.  
22 The USDA seal on 100 percent organic and

1 organic products has raised the bar, and  
2 expanded the organic industry by requiring  
3 more ingredients obtain certification in order  
4 for new products to achieve the USDA gold  
5 standard.

6 To answer your specific question,  
7 what regulatory approaches would facilitate  
8 stronger consumer recognition of the native  
9 organic category, QAI would like to encourage  
10 the CACC to review Section 205.304 of the  
11 regulation with attention on the may versus  
12 must language in regards to the primary made  
13 with organic claim, and the percent organic  
14 statement. For example, with the primary  
15 claim of made with organic ingredients being  
16 optional, a percent claim of X percent organic  
17 ingredients can be used strategically to  
18 compete with products making a primary claim  
19 of certified organic.

20 With that said, we understand the  
21 NOP already intends to issue clarification  
22 regarding labeling in the native organic

1 category, with the intention of reducing  
2 consumer confusion, and we look forward to  
3 receiving that information. As always, we  
4 hope directives regarding labels are  
5 implemented with adequate grace period for  
6 operators to bring labels into compliance  
7 without suffering financial loss.

8           Regarding atmospheric gases and  
9 the 100 percent organic claim, QAI agrees with  
10 the CAC Committee that atmospheric gases do  
11 not meet the definition of processing aids or  
12 ingredients. These inert gases do not mix  
13 with the product and evaporate when packaging  
14 is opened. We support the recommendation that  
15 the use of atmospheric gases will be allowed  
16 as a packaging aid for products making 100  
17 percent organic claim.

18           Regarding the National List and  
19 Sunset of materials, QAI has reviewed the  
20 recommendations to renew materials under all  
21 sections of the National List. We are in  
22 agreement with each Committee's recommendation

1 for lead listing of materials due to Sunset.

2 In summary, QAI supports the immediate  
3 implementation of the Materials Classification  
4 Policy with a limited scope for products used  
5 by handler operations. QAI supports the  
6 intention behind the Livestock Committee  
7 discussion document on stocking rates, but do  
8 not feel enough data has been collected on the  
9 current stocking rates in the US to make any  
10 recommendation at this time. QAI looks  
11 forward to no further action being taken with  
12 regards to a USDA seal on made with organic  
13 products. QAI supports the use of atmospheric  
14 gases and packaging aids in products making a  
15 100 percent organic claim, and QAI supports  
16 the relisting of all materials on the National  
17 List as currently proposed by the NOSB. Thank  
18 you for considering my comments.

19 CHAIRPERSON GIACOMINI: Any  
20 questions? Thank you. One other little  
21 housecleaning, for lack of a better term. It  
22 seems that yesterday with the people on this

1 room on the internet, we had a -- there was an  
2 area meltdown of the wireless support, similar  
3 to the blackout of Manhattan, so they have  
4 requested us not to have everyone on line at  
5 this time, so we've having to -- I guess we're  
6 just asking that the public not be online  
7 unless absolutely necessary, or however it's  
8 to be done. We just don't want to have that  
9 same sort of a disaster again today, because  
10 it was more than just this building. It was  
11 supposed to have been in like a two or three  
12 block area.

13 (Laughter.)

14 CHAIRPERSON GIACOMINI: I'm told  
15 it's already crashed on us. Okay. Gary  
16 Middleton, Grace Marroquin on deck, Liana  
17 Hoodes is in the hole.

18 MR. MIDDLETON: I'm Gary Middleton  
19 and I represent Middleton Organic Orchards.  
20 I would like to first take the opportunity to  
21 thank the Advisory Board for the opportunity  
22 to testify in regards to this issue. Again,

1 I'm Gary Middleton. I represent Middleton  
2 Organic Orchards in Eltopia. I represent  
3 Organic Tree Fruit Growers in the State of  
4 Washington, Oregon, and Idaho, as well. I am  
5 the owner and grower of 100-acre orchard in  
6 which we grow organic apples, cherries, and  
7 blueberries.

8 At issue is our 16-acre block of  
9 Gala apples. Over the past five to seven  
10 years, fire blight has disseminated  
11 approximately five to six acres throughout  
12 this block of apples which equates to 4,000  
13 trees and a financial annual loss of 75,000.  
14 Fortunately, we've had the opportunity to  
15 utilize microshield, or the losses certainly  
16 would have been much greater. We have  
17 replanted with a somewhat resistant stock Bud  
18 9 with, unfortunately, only marginal success.  
19 The one rootstock that has resisted to Fire  
20 blight is Geneva type rootstock, however, it  
21 is difficult for nurseries to propagate,  
22 therefore, availability is limited, at best.

1 According to Dr. Aldwinckle from Cornell  
2 University, Geneva, rootstocks are known to be  
3 resist to direct shoot inoculation with the  
4 amylovora strains. It was, however, not known  
5 if these apple rootstocks are resistant to  
6 infection through other avenues under orchard  
7 conditions. The cost to replant 16 acres of  
8 such a rootstock is extremely cost prohibitive  
9 for a small family farm.

10 It is important to note that not  
11 all varieties of apples are susceptible to  
12 Fire blight. Pink Lady, Gala, Fujis are  
13 susceptible, especially on dwarfing rootstocks  
14 such as M.9, and M.26. Fire blight infection  
15 in susceptible apple rootstocks, such as 9 and  
16 26, frequently results in necrosis of the  
17 rootstock crown and tree death. Fire blight  
18 infection of rootstock can occur by several  
19 different avenues, including infection of  
20 rootstock suckers, basipetal internal movement  
21 of bacteria through healthy scion tissue, and  
22 direct infection of rootstock crown through

1 breaks or wounds in the bark.

2           The infection period primarily  
3 occurs during bloom time when microshield is  
4 used; however, Fire blight carries throughout  
5 the entire season. New shoots or branches are  
6 very susceptible when Fire blight has been  
7 prevalent in the orchard. Spreading of the  
8 disease occurs with wind, rain, heavy dews and  
9 insect transmittal. We utilize the WSU Cougar  
10 Blight models which measure degree days, leave  
11 bloom wetness, and dew points to assure we  
12 apply antibiotics only when infection period  
13 is high to extreme. A close monitoring of  
14 these models allow us to minimize  
15 applications. There would not be widespread  
16 use of oxytetracycline, as there are only a  
17 few of the many rootstocks grown.

18           According to the Department of  
19 Plant Pathology, Oregon State University,  
20 antibiotic use in plant agriculture  
21 constitutes less than one-half of 1 percent of  
22 total antibiotic use in the United States,



1 with the major use of controlling Fire blights  
2 in home fruits. Streptomycin is used in plant  
3 agriculture for bacterial disease control,  
4 particularly against Fire blight in home fruit  
5 orchards.

6 We have utilized bacteria control  
7 such as Blight Ban and Bloomtime with  
8 extremely nominal results. They are not  
9 viable options; however, we still utilize them  
10 to help suppress the disease. We are  
11 constantly monitoring the orchard, cutting out  
12 Fire blight strikes, as needed. Many times an  
13 entire tree becomes affected, and we have no  
14 choice but to remove the tree. It is not  
15 uncommon and very likely for adjoining trees  
16 to become affected, as well.

17 We elected to forego our Europe Ag  
18 certification on the Gala bug, because without  
19 antibiotics the entire orchard would have to  
20 be destroyed. This is not a preferable  
21 option, but rather an economical survival  
22 option. It is important to note streptomycin

1 was utilized in Europe from `93 to `96 to help  
2 suppress Fire blight in orchards. However,  
3 what is of more interest is that Germany had  
4 a severe Fire blight problem in 2008, and has  
5 allowed the use of streptomycin in 2009. In  
6 2009, a high Fire blight risk was also  
7 reported in the UK, and the use of  
8 streptomycin in home fruit tree nurseries has  
9 been allowed in Switzerland for the first  
10 time, because there trees are considered to be  
11 pathogen risk spores.

12 Geographical areas, climatic  
13 conditions, and weather conditions play a  
14 major factor in Fire blight disease models  
15 infection susceptibility. When we planted our  
16 Gala block in 1995, Fire blight was not an  
17 issue in the northwest. Since 2004, the Fire  
18 blight has become a rapid enemy to dwarfing  
19 rootstocks in select varieties. Without  
20 products such as microshield, it is highly  
21 likely that our entire Gala block will be  
22 destroyed. Replanting is not an economical

1 alternative, even if the Geneva rootstock was  
2 available. Like other orchards, we are  
3 anxiously anticipated the organic products to  
4 suppress Fire blight. However, are not aware  
5 of any of these products at this time, or in  
6 the near future.

7 I cannot emphasize enough how we  
8 are concerned about the integrity of the  
9 organic products we provide to consumers. We  
10 take pride in ownership in the fruit that we  
11 produce. This is a complex matter at best,  
12 and there are no easy solutions, so with  
13 confidence, I can say that with stringent  
14 monitoring, and limited use of antibiotics, we  
15 can continue to move forward until a true  
16 organic solution becomes available. Thank  
17 you.

18 CHAIRPERSON GIACOMINI: Thank you.  
19 Questions? Katrina.

20 MS. HEINZE: Thank you very much  
21 for your comments. Would you be willing to  
22 provide Valerie with those in writing so we

1 could have them to reference?

2 MR. MIDDLETON: Yes, I did provide  
3 those. Thank you. And, actually, it's a  
4 little bit more in depth, because I had to  
5 scratch a lot of stuff to get it in five  
6 minutes.

7 MS. HEINZE: I understand. Thank  
8 you.

9 CHAIRPERSON GIACOMINI: Joe.

10 MR. SMILLIE: Sort of off topic,  
11 but do you use pheromone mating disruptives in  
12 your practice?

13 MR. MIDDLETON: Yes, we do.

14 MR. SMILLIE: Right. I just  
15 wanted to clarify that. And has that helped  
16 you a great deal to grow organic apples?

17 MR. MIDDLETON: It's absolutely  
18 been essential. We've been utilizing the  
19 mating disruption for about 10 years, and it  
20 certainly reduces the amount of opportunity,  
21 or need to spray other products. And it has  
22 worked extremely well in the northwest.

1                   MR. SMILLIE: And do you find that  
2                   this synthetic pesticide has enabled you to  
3                   grow more organic -- get more growers growing  
4                   organic?

5                   MR. MIDDLETON: You're talking  
6                   about the pheromones?

7                   MR. SMILLIE: Yes.

8                   MR. MIDDLETON: Yes. The  
9                   pheromones certainly eliminate, or provide the  
10                  opportunity for many other orchardists to grow  
11                  organically, because they can suppress the  
12                  amount of -- available throughout the  
13                  orchards, and it's been a huge tool, and  
14                  benefit to not only organic, but also  
15                  conventional growers. Conventional growers  
16                  are using that substantially to reduce their  
17                  amount of synthetic sprays.

18                  MR. SMILLIE: Thank you.

19                  CHAIRPERSON GIACOMINI: Tina.

20                  MS. ELLOR: When the peracetic  
21                  acid that we approved last fall goes to  
22                  rulemaking, do you see that as a viable

1 option?

2 MR. MIDDLETON: What was that  
3 again?

4 MS. ELLOR: When the peracetic  
5 acid that we approved at the fall meeting goes  
6 to rulemaking, do you see that as a viable  
7 option for at least to --

8 MR. MIDDLETON: Well, at this  
9 time, I don't know that it will be. I'm not  
10 familiar, I have not utilized that product.  
11 You're saying the peracetic -

12 MS. ELLOR: Peracetic acid was  
13 presented to us as an alternative. It is  
14 approved, but it has not been through  
15 rulemaking yet. So, maybe I'll ask you again.

16 MR. MIDDLETON: Is that for Fire  
17 blight?

18 MS. ELLOR: For Fire blight, yes.

19 MR. MIDDLETON: Yes. And we've  
20 tried, like I said, the natural bacterias and  
21 whatnot, and they're very expensive, and we  
22 have had no success with them at all.

1       Although, when you're losing your trees, you  
2       get pretty desperate and you'll use anything.  
3       But I have not seen or heard of anything that  
4       supports that product.

5                   CHAIRPERSON GIACOMINI:   Okay.  
6       Thank you.  Grace Marroquin, Liana is on deck,  
7       and Rod Crossley in the hole.

8                   MR. SIEGEL:  My name is --

9                   CHAIRPERSON GIACOMINI:  You are  
10       not Grace.

11                                   (Laughter.)

12                   MR. SIEGEL:  I'm not Grace, no.  
13       My name is Richard Siegel.  I'm a lawyer from  
14       Washington, D.C., and I'm counsel for  
15       Marroquin Organic International.  Grace  
16       Marroquin is on her way, but she's been  
17       delayed, and asks the indulgence of the Board  
18       for her to appear at a later time today.  So,  
19       I would like to just make that announcement.  
20       Thank you.

21                   CHAIRPERSON GIACOMINI:  Okay.  
22       We'll see what we can do on that.  If we have

1 any of these in the future, contact Valerie so  
2 that we can do that rescheduling.

3 MR. SIEGEL: Yes, I mentioned this  
4 to Valerie, and she requested that I come to  
5 the mic.

6 CHAIRPERSON GIACOMINI: Okay.  
7 Just, you take care of it so that we'll --  
8 okay. Let's go Liana, and then we'll come  
9 back to Grace. I believe she's coming in the  
10 door.

11 MS. HOODES: Good morning, all.  
12 I'm Liana Hooded with the National Organic  
13 Coalition. First, I would like to -- I see  
14 you all have these -- to present to you the  
15 National Organic Action Plan from the Margin  
16 to the Mainstream Advancing Organic  
17 Agriculture in the US. This is a project we  
18 worked on for five plus years, and it's about  
19 the big picture looking at supporting organic  
20 throughout the federal government, and state  
21 and local government. So, the goal of the NOAP  
22 is to establish organic as the foundation for



1 food and agriculture production systems across  
2 the US So, enjoy the light reading in your  
3 free time, test you on it at the end of the  
4 week.

5 The National Organic Coalition is  
6 a national alliance of organizations  
7 representing farmers, environmentalists, other  
8 organic industry members, and consumers  
9 concerned about the integrity of national  
10 organic standards. The goal of the Coalition  
11 is to assure that organic integrity is  
12 maintained, that consumers' confidence is  
13 preserved, and the policies are fair,  
14 equitable, and encourage diversity of  
15 participation and access.

16 I want to welcome all the new  
17 members of the Board, and thank all of you for  
18 your continued hard work and dedication to  
19 organic.

20 I'm going to whip through some  
21 points to get to the details on others.  
22 Nanotechnology, there are others who have much

1 better information, and you'll hear details  
2 from the Center for Food Safety, Food and  
3 Water Watch, and Consumers Union. We support  
4 their comments on this, and we specifically  
5 feel that this is an instance where organic  
6 takes the lead in the precautionary principle.  
7 The issues are about big concern for health  
8 and safety, and we feel all materials  
9 developed with this technology should be  
10 prohibited, as a whole.

11 Nanotechnology is intended to  
12 change and manipulate nature at a fundamental  
13 level, and we do not agree that the  
14 classification of the technology as synthetic  
15 would provide the protections needed at this  
16 point. We're very happy to see that the NOSB  
17 is taking a careful approach, and support the  
18 request for more information, and a technical  
19 review.

20 Sunset Review Policy, this is  
21 something we've commented on a lot over the  
22 years. We're very pleased to see that it's

1 under review. We have been very disturbed  
2 over the years at the mention of the vague  
3 term of evergreen, and we're glad to see  
4 that's no longer a part of the discussion.  
5 And we did disagree with the interpretation of  
6 the Board that's now in the policy manual that  
7 annotations can't be changed during Sunset  
8 Review, so we encourage you to revise the  
9 policy manual as soon as possible to allow you  
10 to make those annotations.

11 We consider that Sunset means that  
12 after five years, the material comes off.  
13 Option 1 seems the clearest, but I'm intrigued  
14 by Option 3. I just worry that it presents  
15 you with a burden, another burden on top of  
16 all the rest of your burdens to prove -- so  
17 that you have to take a material off, as  
18 opposed to it automatically coming off. But  
19 I think I need to understand it just a bit  
20 more about what Option 3 is. I do not support  
21 Option 2 at all.

22 Sunset is clearly understood

1 throughout industry and government as a  
2 process that a material would stop, and we  
3 really think that decisions have been made  
4 from the very first Board about what materials  
5 should be on the list based on the fact that  
6 they understood that in five years that they  
7 would come off. And if they were to come back  
8 on, there would be a complete re-review. And  
9 we need to stick with those -- the issues of  
10 essentiality and compatibility when you're  
11 reviewing the materials. And it needs to be  
12 redone.

13 So, methionine is a poster child  
14 for what's going wrong with Sunset. It's had  
15 extensions, and we have -- there are  
16 alternatives, and they're just not there yet,  
17 in part, because there's no impetus for the  
18 industry to go there. We heard from Walter  
19 Goldstein about his research very close to  
20 actual commercial production of high  
21 methionine corn, and he -- because of a lack  
22 of USDA grants, because they don't tend to

1 fund corn that isn't GMO corn research, he has  
2 not been able to continue that. The industry  
3 should have stepped in and funded that  
4 research to get to commercial availability.

5 I don't think they did, because they didn't  
6 actually think it was going to come off.

7 There was no imperatives. This is why  
8 methionine needs to come off, and we don't  
9 agree with a five-year extension whatsoever.

10 I had two comments on materials, but they'll  
11 be in my written comments to you.

12 CHAIRPERSON GIACOMINI: Thank you.

13 Any questions? Okay. I think this is a good  
14 example, and not to point the finger at her,  
15 we know you appreciate being here, and we  
16 certainly appreciate you coming, but we would  
17 really appreciate that the majority of your  
18 time is spent on your substantive comments.

19 That's going to be your best use of time, and  
20 it's our best use of time over a long day.

21 So, I don't -- I want to sound as polite with  
22 that, as possible, but I'm sure Liana wishes

1 that she had spent that time talking about  
2 those materials, rather than saying how much  
3 she liked being here. So, next up, Rod  
4 Crossley. I think Grace is in the room. We'll  
5 slide Grace in, and Kim Dietz in the hole.

6 MR. CROSSLEY: Good morning. I'm  
7 Rod Crossley. I was on the Board that put  
8 together the materials in the 2000 list. When  
9 we started that, the only thing we had to work  
10 from was the -- when we started that, the only  
11 thing we had to work from was the Act. And  
12 that was our guiding line for both the  
13 comments to the Secretary, and for the  
14 National List. We also had organic production  
15 standards established by private certifiers,  
16 and we had an industry standard at that time  
17 which has definitely gone away, which was that  
18 if you could get it organically, that was what  
19 you had to use. And if you couldn't get it  
20 organically, could you get it naturally? And  
21 if you couldn't get it naturally, could you  
22 get a synthetic, and how fast could you go

1 back up the hill?

2 The Processing Committee was one  
3 of the three committees that the Board  
4 established, Crops, Livestock, and Process.  
5 The Processing Committee had the fortunate  
6 ability to travel around the United States  
7 meeting with private industry, meeting with  
8 certifiers, meeting with the public to  
9 basically find out what they're doing. What  
10 are you doing? What materials are you using?  
11 How are you keeping records? What do you  
12 think of our OSP drafts, et cetera? And after  
13 much discussion at the Board meeting, the  
14 Committee and the public, we came up with a  
15 list of 130 processing materials that needed  
16 to be reviewed with a TAP, because remember  
17 the rules, the Act states that any material  
18 put on the list must, or prohibited on the  
19 list, must go through a TAP review. There's  
20 no exception to that part of the rule at all.

21 The problem was that we realized  
22 that there were a bunch of things on there

1 that we knew were natural, but based upon the  
2 definition of synthetic, we had to go and  
3 review them. Cornstarch is a good example of  
4 that. It goes through, as we talked about  
5 yesterday, it goes through an acid bath. We  
6 were going down the cornstarch side, not the  
7 liquor side, and we were wondering if the corn  
8 physically changed. It doesn't, so now -- but  
9 we had to do a TAP review to prove it, and  
10 then vote on it, and add it to the list. So,  
11 that was -- an after Orlando, we issued a  
12 directive called a Progress Report on the  
13 Proposed National List. And, basically, what  
14 that did was it outlined what we were going to  
15 do, what we did, how it worked, and what we  
16 were going to do, the steps we were going to  
17 take going forward, which Miles alluded to  
18 yesterday in that we did two reviews. You did  
19 this synthetic, and do you add it? And if  
20 it's processing, do you -- is it going to go  
21 for all the processing, or only for made with?  
22 So, there are two points in that -- and, also,



1 we issued a preamble. I'm getting lost.

2 We also issued a preamble of the  
3 proposed list. I want to read two pieces of  
4 it. "The expectation to be embodied in the  
5 National Organic Program Standards is that  
6 cultural, biological, and other management  
7 practices will be sought to replace any  
8 material input, synthetic or natural, as the  
9 organic production system evolves over time."  
10 And for processing it says that, "Non-organic  
11 agriculture ingredients may be used in organic  
12 foods only when an acceptable organic product  
13 form is commercially unavailable.  
14 Justification for the use of non-organic  
15 ingredients, as well as the efforts to develop  
16 organic sources for non-organic ingredients  
17 must be addressed within the handling plan,  
18 and the record keeping requirements of the  
19 rule."

20 After Indianapolis, we had voted  
21 on 166 materials. Oh, God. We had voted on  
22 166 materials, and I'll cut to the chase.

1       There are 28 materials that we considered to  
2       be natural. We put those on -- you put them  
3       on 605. They should be on 606. That's where  
4       we expected them to be. And, by the way, we  
5       expected those to be natural, to be used as  
6       organic. But the other thing that's bothering  
7       me is that on the National List at the present  
8       moment is a material that has never gone  
9       through a TAP review, and that's flavors. The  
10      Board only issued a memorandum for the use of  
11      natural flavors in organics at Austin, so I  
12      would request that you remove that material  
13      and put it through a TAP review to see if it  
14      comes back on as a synthetic, or as a natural.  
15      Thank you.

16                   CHAIRPERSON GIACOMINI: Any  
17      questions?

18                   MR. CROSSLEY: I'm sorry.

19                   CHAIRPERSON GIACOMINI: No, that's  
20      all right. I don't think we have any, anyway.  
21      Okay, so we're fine. Grace Marroquin, Kim  
22      Dietz on deck, Kelly Shea in the hole.

1 MS. MARROQUIN: Good morning. My  
2 name is Grace Marroquin. I'm President and  
3 CEO of Marroquin Organic International based  
4 in Santa Cruz, California. We are importers  
5 and suppliers of organic ingredients since  
6 1991. I would like to thank the 10 Board  
7 members who are continuing to serve, and I  
8 welcome the new five members, and I  
9 congratulate you.

10 For those of you who have seen me  
11 before at the NOS meetings, please indulge me.  
12 I've been addressing the Board at almost every  
13 meeting since 2004. And once again, I'm here  
14 to talk about our favorite topic, organic  
15 yeast.

16 Organic yeast is produced in  
17 Germany by a well-established company, Agrano.  
18 Agrano has been NOP-certified since 2003, and  
19 until November 2008, we sold Agrano's organic  
20 yeast to a small group of customers in the  
21 United States. Then the NOP received a  
22 complaint, and cited Agrano with a non-

1 compliance. The NOP claimed that yeast could  
2 not be marketed as organic, because it was  
3 listed on the National List as non-  
4 agricultural. Agrano filed an appeal to the  
5 AMS, on March 2nd, 2010 under new management  
6 lifted that non-compliance, and we are  
7 certainly grateful to the NOP for this  
8 decision. On April 15th, the AMS formally  
9 closed the appeal as moot, and made the appeal  
10 as moot. The NOP now recognizes again that  
11 yeast can be certified as organic. Then why  
12 are we here before this Board once again?  
13 Because we still have a loophole in the  
14 National List, and the Board is in charge of  
15 this National List.

16 Yeast is still classified on the  
17 National List as a non-agricultural substance  
18 on Section 205.605(a). This means organic  
19 food processors are allowed to use  
20 conventional yeast freely as an ingredient in  
21 their 5 percent non-organic content. Food  
22 processors do not have to look for an organic

1 version. There is no organic preference  
2 applied when it comes to yeast, not fair. As  
3 a result, the vast majority of organic  
4 processors continue to bypass and use  
5 conventional yeast. If yeast would be listed  
6 on 205.606 as an agricultural product,  
7 processors would have to use organic yeast, if  
8 it were commercially available. This would be  
9 a gain for the organic integrity of processed  
10 foods sold as organic.

11 In fact, the reason Agrano  
12 developed organic yeast was because European  
13 organic community objected to the synthetic  
14 chemicals involved in conventional yeast.  
15 These include ammonia, sulfuric acid, caustic  
16 soda lye, synthetic vitamins, and synthetic  
17 antifoaming agents. The waste water from  
18 conventional yeast product is contaminated,  
19 and must be treated before it's released.

20 In organic yeast production, none  
21 of these chemicals are used. The waste water  
22 is pure and can be reused in organic

1 production. In fact, we all could enjoy a  
2 glass of it right now. If you were to use the  
3 waste water from conventional yeast, surely  
4 you would be in the hospital.

5 Turning now to organic yeast, it  
6 does not use synthetic chemicals, as I've  
7 stated. It is grown on a substrate of organic  
8 grains. If there were a robust organic yeast  
9 industry here in the United States, then  
10 organic farms would produce these grains  
11 needed to make the organic yeast. The entire  
12 organic sector would benefit.

13 Yeast companies are watching this  
14 issue closely. I can assure you of this,  
15 because as soon as yeast is transferred to  
16 205.606 they will meet the challenge, and the  
17 demand for organic yeast. There is no doubt.  
18 The EU first recognized organic yeast in its  
19 organic regulations in 2007. Under the  
20 current EU regulations, all yeast in organic  
21 processed foods must be organic, must be  
22 organic, as of December 31st, 2013. They gave

1       them this grace period, so to speak, to meet  
2       this challenge. This is causing Agrano, and  
3       other producers, to increase their capacity.  
4       However, the picture in the United States is  
5       far different. There will be no incentive for  
6       Agrano, or any other yeast company, to build  
7       capacity in this country for organic yeast  
8       until the National List gives yeast organic  
9       preference.

10               In addition, if the NOP does not  
11       require organic yeast, this could lead to a  
12       trade issue with EU, and I know right now  
13       we're engaged in these talks for equivalency.  
14       We look forward to this fall meeting. Yes, I  
15       do, when the Handling Committee intends to  
16       have a recommendation on the petition to  
17       reclassify yeast as an agricultural product.

18               In closing, I would like to thank  
19       the Joint Material and Handling Committee for  
20       its efforts. I know it's been a long road,  
21       and I know that we all are working towards the  
22       same goal, at least I hope. I know, I know,

1 I really do. And we look forward, we, I look  
2 forward to seeing you in the fall. Thank you.

3 CHAIRPERSON GIACOMINI: Questions  
4 for Grace?

5 MS. MARROQUIN: Yes?

6 CHAIRPERSON GIACOMINI: Joe.

7 MR. SMILLIE: Bring the champagne.

8 MS. MARROQUIN: Oh, good. Surely,  
9 I will. Thank you, everybody.

10 CHAIRPERSON GIACOMINI: Thank you.  
11 Kim Dietz, Kelly Shea on deck, Patty Lovera in  
12 the hole.

13 MS. DIETZ: I had to bring my  
14 water, because I'm losing my voice, so I  
15 apologize if I sound hoarse, and hopefully I  
16 make it through. Just a little bit of  
17 housekeeping before, if I may. We're bringing  
18 lunch in. We have a caterer bringing boxed  
19 lunches, so if you have not placed your order,  
20 and you'd like to, you have about 15 minutes  
21 to get lunch orders in. So, please see me out  
22 in the lobby after my presentation. And



1 welcome to California.

2           Okay. Good morning. I can't see  
3 my presentation here. My name is Kim Dietz,  
4 and I'd like to welcome all the new Board  
5 members, and thank each and every one of you  
6 for your service. And I just have to say  
7 that, Dan. For those new Board members, I  
8 served on the NOSB as Handler Representative  
9 from 2000 to 2005. During that time, I was  
10 Materials Chair, as well as Board Secretary,  
11 as well as one of the founding members of  
12 OMRI, a Materials Working Group.

13           I worked for Smuckers Natural  
14 Foods for 26 years, and today my comments are  
15 really my own comments based on my work with  
16 the Board, and not those of my employer. I  
17 have submitted comments in regulations.gov  
18 under Smuckers, and you can read those, if you  
19 like.

20           I'm going to start with Sunset,  
21 and get into definitions of insignificant, and  
22 end up with classification, if I have time.

1 So, yesterday Miles urged the Board to use  
2 caution with regard to Sunset. I agree with  
3 him, that this is a timely process that must  
4 be met within the five-year time period. Your  
5 role on this Board is to insure that Sunset is  
6 conducted timely, and efficiently. I  
7 encourage this Board to take into  
8 consideration the work that was put into the  
9 Sunset process by previous Board members,  
10 industry, and the National Organic Program.

11 The issues emerging in the Policy  
12 Committee's 2010 Sunset Review document are  
13 not new. In fact, if you read the minutes, we  
14 deliberated over those exact same issues,  
15 annotation change, extensive material review,  
16 how much of the criteria do we need to do the  
17 re-reviews? I'm confident that we did the  
18 best that we could to provide you with the  
19 tools that you need for the tremendous task of  
20 Sunset Review.

21 Below are a few historical  
22 highlights of the process. I just wanted to

1 remind you that in 2002, we started, I was on  
2 the Board at the time, I was Chair of  
3 Materials, and we started working on the  
4 Sunset process. In 2004, Ms. Rosalie Koenig  
5 was Chair of Materials, and she brought a  
6 document before the Board on the Sunset Review  
7 process. During that same year, the NOP  
8 brought their version of the Sunset Review  
9 process. Later on, it took about three years  
10 to evolve through this, but once we did, we  
11 had a joint agreement on what the Sunset  
12 process should be. It was a hybrid approach  
13 between the National Organic Program and the  
14 review of the Board, and it was voted on  
15 unanimously by the Board, and that is the  
16 Sunset process that is currently in your  
17 policy book today.

18 I do agree that over time things  
19 need to change, and that you guys need the  
20 tools that you need to do a thorough review.  
21 I wanted to just quote something, because,  
22 believe it or not, back in 2002, 3, and 4, we

1 knew that 2012 Sunset was coming. And we  
2 thought that it would be a train wreck if we  
3 didn't have a process in place that ran smooth  
4 so that you could review these 186 materials  
5 that were coming up for Sunset. So, I just  
6 wanted to quote something, and there's more to  
7 it before this, but "Understand that in 2012,  
8 if we're all still here, how many of us are  
9 still here -- this big clump that became  
10 active October 21st, '02, this big clump of  
11 materials has to go through it again, plus any  
12 materials that are voted on on an annual  
13 basis." So, again, I guess that -- just in  
14 summary, please take that into consideration.

15 I support the new Sunset  
16 guidelines that were put out in the most  
17 recent Federal Register asking for the OFPA  
18 criteria. If you look at my public comments,  
19 I did a template. I hope that -- please look  
20 at that. I tried to -- it took me about a week  
21 to put it together. I did a very thorough  
22 job. I think that gives you more information

1 than you've ever had, and I think it's a  
2 stepping stone to what you're looking for. I  
3 support the request for new TAPs. That's not  
4 new, every Board has had that opportunity, if  
5 you need it.

6 I also support annotation change.  
7 We were never told you could not change an  
8 annotation. We did not want to do that,  
9 because we felt the annotations change need to  
10 come through the petition process. As a  
11 Board, we recommended that when we finalized  
12 that Sunset.

13 And, last, I do not support re-  
14 petitioning. I think that you need to  
15 transition. If you don't have enough of the  
16 information that you need, then let's look at  
17 it, but let's not go too far. I think you do  
18 have the tools that you need. Thank you.

19 CHAIRPERSON GIACOMINI: Questions?  
20 Joe.

21 MR. SMILLIE: The current Policy  
22 Committee recommendation provides three

1 options. With your experience, and your  
2 viewpoints, which of the Options --

3 MS. DIETZ: Well, I didn't choose  
4 any of them. I choose a hybrid to one. I  
5 like the current process with the ability to  
6 change annotations, and the new OFPA criteria.  
7 I think that's a good step to try. If it  
8 doesn't work, then let's go back at it.

9 CHAIRPERSON GIACOMINI: Katrina.

10 MS. HEINZE: If we were crazy  
11 enough in our free time to want to go back and  
12 read some current transcripts, is there one or  
13 two you would draw our attention to?

14 MS. DIETZ: For the Sunset? It  
15 was all in October -- actually, April 2004 and  
16 October 2004. That's when the NOSB brought  
17 their recommendation, and then the NOP brought  
18 their's, and we voted on it in October 2004.

19 And then just lastly, I gave  
20 Katrina on insignificant. I did a lot of  
21 work. I scoured the CFRs, and I put a couple  
22 of pages of CFR references to insignificant,

1 and I'll give those to Valerie to give to the  
2 Board.

3 CHAIRPERSON GIACOMINI: Thank you.  
4 Kelly Shea, Patty Lovera on deck, Jennifer  
5 Fearing in the hole.

6 MS. SHEA: Good morning,  
7 everybody. That coffee out in the hallway was  
8 really nice this morning.

9 I'm Kelly Shea with White Wave  
10 Foods. You have my submitted comments on the  
11 agenda. I was intending to go over those  
12 again, but I think in light of the surprising  
13 announcement by USDA yesterday regarding new  
14 thinking on the use of accessory nutrients in  
15 organic food, and the subsequent press  
16 release, and then Wall Street Journal article,  
17 I just wanted to make a couple of comments to  
18 the Board about the DHA product that's used in  
19 Horizon organic milk, and to talk a little bit  
20 about process.

21 So, first off, we really do want  
22 to thank Miles McEvoy and the NOP for

1 clarification, because it is always better for  
2 farmers, and certifiers, and processors when  
3 the requirements for organic compliance are  
4 clear as a bell. And we've been asking for a  
5 lot of years for USDA determinations on  
6 interpretation of the regulations to be  
7 published in today's news, to be sent to  
8 certifiers, and available to all participants  
9 in the organic community.

10 That said, changes to a published  
11 USDA position that has been in place for over  
12 four years, and impacts processors and their  
13 farmer suppliers, needs to be implemented  
14 thoughtfully. While we would have preferred  
15 that the work that resulted in the position  
16 outlined yesterday would have been done in a  
17 transparent manner, and would have been posted  
18 in advance of the meeting, we do accept it as  
19 done. Last we had heard, the NOP was coming  
20 to this meeting to present a document that  
21 asked questions on accessory nutrients, not  
22 made a declaration changing the way business



1 has been happening. So, I would just ask the  
2 Board and the program to ensure that the  
3 forthcoming petitions for accessory nutrients  
4 that you will get, because they're going to be  
5 necessary to comply with the new thinking,  
6 that they're reviewed and voted on in a timely  
7 manner, and that the timeline be coordinated  
8 with implementation of the new interpretation.

9           And I'd also like to note for the  
10 Board that contrary to a published report, the  
11 DHA product that we've used since 2007 is made  
12 from algae and it's not hexane-extracted.

13 It's extracted with alcohol. DHA in certified  
14 organic products is currently in use by more  
15 than a dozen different companies allowed by  
16 four different USDA-accredited certification  
17 agencies, and carried in stores all across the  
18 nation, so we look forward to seeing the TAP  
19 review that was done on the substance, and  
20 commenting on that TAP review. We're not in  
21 favor of TAP reviews that are done kind of the  
22 Google approach, and contain erroneous

1 information, and cite unqualified sources, so  
2 we'd really like to have an opportunity to see  
3 that TAP and comment on it.

4 And then, in light of the new  
5 thinking on vitamins and minerals, the Board  
6 may want to consider deferring their Sunset  
7 vote on this listing until more clarification  
8 is provided from the program, and the proper  
9 annotation can be researched and decided on.

10 So with that, I'm going to end,  
11 but I just need to say, because Mr. Kevin  
12 Engelbert is not here today, I want to take  
13 the opportunity to reiterate that we strongly  
14 disagree with the recommendation for  
15 clarification of 205.238 by the Livestock  
16 Committee. We agree with the minority  
17 opinion, Mr. Engelbert's. If an animal is  
18 treated with a substance that requires a  
19 withhold, that milk cannot be put in the tank  
20 to be shipped, nor should it be fed to calves.  
21 Calves are only allowed to have certified  
22 organic feed, and that includes milk. And

1 milk from cows that have been treated with a  
2 substance that requires a withhold, or is a  
3 prohibited substance, should be disposed of,  
4 and that disposal should be recorded in a  
5 farm's audit record keeping. Thank you very  
6 much.

7 CHAIRPERSON GIACOMINI: Questions  
8 for Kelly? Tracy.

9 MS. MIEDEMA: I'd like to ask a  
10 question of the Deputy Administrator in light  
11 of the announcement yesterday, and in light of  
12 what Kelly just brought up. Yesterday, there  
13 was a reference to ample time and transition  
14 time. There is also a request that the NOSB  
15 help flesh out what the scope of nutrients,  
16 vitamins, and minerals would be. And I  
17 wondered if you could just spell out some more  
18 details about what that transition time looks  
19 like, and what the process would be that you  
20 see.

21 MR. McEVOY: Yes. First of all, in  
22 general, we would like to have these TAP

1 reports and other information to the Board way  
2 ahead of time, that we were expecting to come  
3 to this meeting with just some questions and  
4 information about accessory nutrients. And we  
5 got the clarification from FDA really very,  
6 very recently, and that's why the announcement  
7 is here. Basically, as soon as we got the  
8 information, we put it together in a coherent  
9 fashion for presenting it to the organic  
10 community.

11 In terms of timeline, I think  
12 there's a lot of information that we need to  
13 understand about how many products are out  
14 there, what kind -- what are the products,  
15 what's the universe of these substances, these  
16 accessory nutrients that are used in organic  
17 food products. And once we have a better  
18 understanding of that, then we'd have a better  
19 sense how long that transition would occur,  
20 that timeline would be.

21 Since this was allowed by the  
22 Program for understanding of the organic

1 industry that these compounds were allowed, we  
2 need to give ample time for that transition to  
3 occur. We need to have ample time for  
4 petitions to be received, reviewed, and  
5 potentially approved by the Board, and then go  
6 through the proposed final rulemaking process.  
7 So, we're probably talking about a couple of  
8 years, even in an expedited process, for this  
9 to work its way out of the system, or work its  
10 way through the system.

11 In terms of a draft guidance,  
12 we're hoping to get that out later this  
13 summer. Again, there would be a 60-day  
14 comment period. After the comment period, we  
15 would look at the comments, and then issue  
16 final guidance, but we're looking at a couple  
17 of years in terms of the transition here.

18 CHAIRPERSON GIACOMINI: Anything  
19 else for Kelly?

20 MS. SHEA: Thank you, and thank  
21 you, Miles, for that.

22 CHAIRPERSON GIACOMINI: Okay.

1 Patty Lovera, Jennifer Fearing, Urvashi  
2 Rangan.

3 MS. LOVERA: Hi, my name is Patty  
4 Lovera. I work for a consumer group called  
5 Food and Water Watch out of our D.C. office.  
6 We also have an office in San Francisco, and  
7 we're a member of the National Organic  
8 Coalition. So, I submitted more detailed  
9 comments specifically on nanotechnology, but  
10 I'm going to go over kind of the short version  
11 of that pretty quickly.

12 So, in short, to answer the  
13 questions that were in the document you put  
14 out for discussion, we think that  
15 intentionally engineered nanomaterials should  
16 meet those questions you asked about whether  
17 or not they're synthetic, but we're also  
18 looking for more than that to make sure that  
19 they are not part of the organic program,  
20 they're not part of this market, so we're  
21 looking for them to be prohibited as a group  
22 of materials.

1                   In terms of what are we talking  
2                   about when we're talking about nanotechnology  
3                   and how it should be defined, I think the key  
4                   points are that this is an intentional process  
5                   of engineering materials to be on this scale  
6                   of one to 300 nanometers. We're not looking  
7                   to lump in naturally occurring things that  
8                   happen in other processes where you weren't  
9                   intending to create nanomaterials, or not  
10                  dependent on nanomaterials coming out of that  
11                  process, like homogenization, or grinding  
12                  flour. We're looking for an exclusion of when  
13                  you're intentionally creating these materials  
14                  on this scale. And the reason we think that's  
15                  important is because these materials are  
16                  different. They're not just smaller, they're  
17                  different. And to lots of the questions that  
18                  you had in that document, we tried to answer  
19                  by saying they act differently, they react  
20                  differently, and we need to treat them  
21                  differently. They're not just tiny versions  
22                  of their former selves. So, we put lots of

1 things in there, in that more detailed  
2 comment. I'm happy to provide copies of  
3 anything that we referenced, but I think the  
4 most important point is that one of the most  
5 recent papers we received described  
6 nanomaterials as having a novel mechanism of  
7 toxicity. They act differently in our bodies.  
8 They can cross barriers that other chemicals  
9 cannot, like the blood brain barrier, and cell  
10 walls, and things like that. And we're  
11 dealing with different types of toxicity we  
12 haven't seen before. And that's why we don't  
13 think it's enough to put it in this  
14 classification when we're dealing with a  
15 petition process for synthetic materials. We  
16 want to build a wall to keep these out, and  
17 deal with them as a class, that, if you're  
18 intentionally creating these materials, they  
19 don't have a place in organic.

20 So, I think, kind of to sum up,  
21 it's just that we're looking for a more robust  
22 exclusion of this than just taking it down



1 that synthetic path, where you're going to  
2 have to deal with petition after petition to  
3 try to figure out which ones go on which list.  
4 I don't think that's a manageable exercise for  
5 the NOSB to have to do. There's been some  
6 studies that even for the EPA, or the FDA,  
7 agencies that are, in theory, set up to deal  
8 with things like this, it's going to take them  
9 decades, and hundreds of millions of dollars  
10 to start to even figure out what we're looking  
11 at with these new materials. And I don't  
12 think that's the venue for the NOSB to have to  
13 deal with on a case-by-case basis. So, we  
14 just think that's a really important issue for  
15 the label, for consumers to feel good about  
16 organic, and feel like it's credible, that  
17 they understand that there's been an effort  
18 made to keep these engineered nanomaterials  
19 out of the system.

20 So, just really quickly on a  
21 couple of other points, which Liana brought up  
22 for the National Organic Coalition, and others

1 will bring up, as well, later on the  
2 methionine issue, this is one that the  
3 consumers that we interact with, who read our  
4 materials and contact us, and ask us questions  
5 about labels, they're aware of it, but I think  
6 they're starting to become aware of it as like  
7 a proxy for a bigger discussion that hasn't  
8 necessarily happened about poultry, and it's  
9 a discussion about what kind of systems are we  
10 using to raise organic culture, so we're  
11 having conversations year after year about  
12 this one specific material, methionine, and  
13 they're not getting a sense that we're having  
14 a discussion about, how big are these systems?  
15 Are they imitations of the confinement model  
16 of conventional agriculture that more and more  
17 people are looking for an alternative to, so  
18 we'd like to see -- we'd like to be done with  
19 this conversation about methionine and get to  
20 a point where we are talking about the other  
21 things you're talking about, like density, and  
22 management, and breeds, are we using the right

1 breeds? I mean, this is a system conversation  
2 and we're boiling it down to a chemical  
3 conversation. So, I think for consumer  
4 clarity, and for the label's credibility, it's  
5 time to get this out of the system as quickly  
6 as possible.

7           And then, that really leads to  
8 what Liana was talking also about the Sunset  
9 issue. We agree that when these things  
10 expire, they need to come off the list. And  
11 if we're going to tell consumers that this is  
12 a label that's based on continuous  
13 improvement, and finding incentives to find  
14 alternatives that aren't synthetic, there has  
15 to be a clock that actually expires. And this  
16 kind of cycle where they stay on there needs  
17 to stop.

18           And then, finally, the last point  
19 I'll make is that with the Made With Organic  
20 label option, we think that this, again, is a  
21 standard, maybe, that's missing some context  
22 about how we enforce the use of the word

1 "organic," so we'd like to see some more  
2 concerted effort on enforcing the use of the  
3 word "organic" before we worry about changing  
4 that standard, and moving that seal to a  
5 different tier. So, we would like to see some  
6 reining in of the organic -- the use of the  
7 word "organic" that we all see before we  
8 decide whether to move that seal to a  
9 different category.

10 CHAIRPERSON GIACOMINI: Okay.

11 Thank you. Any questions? Katrina.

12 MS. HEINZE: I just wanted to  
13 thank you for your detailed comments on  
14 nanotech; specifically, the proposed  
15 definition. That gives us something to start  
16 with, so we appreciate it.

17 MS. LOVERA: Good. Thank you.

18 CHAIRPERSON GIACOMINI: Okay.

19 Joe.

20 MR. SMILLIE: Just a brief  
21 comment. And, again, this covers a lot of  
22 issues, and I appreciate everything you said.

1 I'm basically, in agreement. It's just when  
2 you talk about synthetics, it brings up a big  
3 issue. The whole of organic agriculture is  
4 not anti-synthetic, and I think we're starting  
5 to hear more and more people saying we've got  
6 to get rid of all synthetics. And I just  
7 disagree. I don't think that's where the NOSB  
8 and the NOP are going. That battle was fought  
9 a long time ago. All that is natural is not  
10 necessarily good, and all that is synthetic is  
11 not necessarily bad. And we have an  
12 orchardist, Gary Middleton, talking about a  
13 synthetic pheromone mating disruptor, which is  
14 a synthetic pesticide under FIFRA, and it has  
15 allowed organic to grow, so I just do not feel  
16 that this complete use of the word "synthetic"  
17 as equating bad is necessarily where we want  
18 to go. Synthetics can be very beneficial to  
19 the planet, and to consumers, and I just  
20 wanted to make that point now, and I will try  
21 to refrain from making it again.

22 CHAIRPERSON GIACOMINI: Yes, I

1 just have one -- I'd ask one point for  
2 clarification on your nanotechnology comments.  
3 In the category of that intentionally created,  
4 there were comments submitted of, I believe,  
5 slow churn processing that intentionally  
6 creates small nanosize particles to improve  
7 mouthfeel. Would that fit in under your idea  
8 of intentionally created, or fit in under the  
9 incidental along with the grinding and --  
10 general grinding and homogenization?

11 MS. LOVERA: Yes. We had a lot of  
12 conversations about that particular -- I think  
13 in ice cream is where it's happening, and  
14 there's a lot of interest in it, and low fat,  
15 trying to make low fat feel like full fat.  
16 And I think the line for us is intentional,  
17 because all of these substances we're starting  
18 with are known, and then when you  
19 intentionally put them in this nano system  
20 they behave differently. So, I think that's  
21 the line. If you're intentionally going for  
22 a nanoscale material because you think it will

1 act differently -- otherwise, why would you do  
2 it? -- then that puts you in the category of  
3 these intentionally engineered materials that  
4 we think aren't part of that.

5 CHAIRPERSON GIACOMINI: Okay.  
6 Thank you. I just wanted to clarify that.  
7 Thanks. Anything else? Okay. Seeing none,  
8 Jennifer Fearing, Urvashi Rangan on deck,  
9 Michael Hansen in the hole.

10 MS. FEARING: Good morning. My  
11 name is Jennifer Fearing. I am here on behalf  
12 of the Humane Society of the United States.  
13 I'm our California State Director, and on  
14 behalf of our nearly 11 million supporters  
15 nationwide, we are pleased to respond, and we  
16 did so in writing, and are pleased to be here  
17 today in person with respect to the proposed  
18 stocking rate charts that you're considering.

19 We think it's important to be here  
20 to support the NOP's commitment to high  
21 standards of animal care and housing. Many  
22 organic producers recognize that humane

1 treatment of animals is integral to organic  
2 principles and philosophy. Consumers expect  
3 organic farms to meet the animals' needs,  
4 especially their needs for adequate living  
5 space, and the freedom to express their  
6 natural behaviors.

7 We support the most generous  
8 stocking densities that are feasible for  
9 producers, and we would be concerned with any  
10 proposals to increase the density or the  
11 stocking rates above those that are outlined  
12 in the proposed November 2009 rate charts,  
13 which correspond with the Canadian  
14 requirements. We feel strongly that these  
15 should not be weakened.

16 We raised, in our letter of April  
17 12th, some specific concerns. While we are  
18 generally very supportive of the overall space  
19 allowances, we just wanted to highlight the  
20 finishing space for cattle, and make sure that  
21 those are in alignment, as well, with the  
22 Canadian requirements, and draw attention to



1 some potential concerns about accidental  
2 crushing of piglets, if no space is required  
3 to make sure that they have adequate zone to  
4 avoid that outcome, and wanted to refer you to  
5 the Global Animal Partnership Program, a plan  
6 that's already devised some requirements in  
7 that area. And we would strongly encourage  
8 the Board to incorporate those, and to fail  
9 farms that don't have the ability to meet  
10 those requirements.

11 So, again, mostly I'm just here to  
12 provide strong support for the direction that  
13 you're headed in, and to encourage you not to  
14 weaken any of the densities that you proposed.

15 CHAIRPERSON GIACOMINI: Thank you.  
16 Questions? Thank you.

17 MS. FEARING: Thanks.

18 CHAIRPERSON GIACOMINI: Urvashi  
19 Rangan, Michael Hansen on deck, Charlotte  
20 Vallaeys in the hole.

21 MR. RANGAN: Hi, good morning. I  
22 believe I have the proxy for Michael. Right,

1 Valerie? Yes. Well, good morning. My name  
2 is Urvashi Rangan. I am the Director of  
3 Technical Policy for Consumers Union. We  
4 publish Consumer Reports Magazine. I'm also  
5 an Environmental Health Scientist,  
6 Toxicologist.

7 I'd like to begin with  
8 nanomaterials. We also have comments. I'm  
9 sorry they're going to get to you late, but  
10 we're able to submit them to you this morning.  
11 We concur with the comments of Patty Lovera  
12 from Food and Water Watch, that we believe  
13 nanomaterials, it's really about the  
14 intentional creation of engineered  
15 nanomaterials, and then the prohibition of  
16 those materials in organic production.  
17 That's, ideally, what we would like to get to.  
18 We understand that treating them as  
19 synthetics, at least as of today, gets us one  
20 step further, but we think, at the end of the  
21 day, that is a type of substance that needs to  
22 be prohibited in organic production for all

1 the reasons Patty mentioned.

2           These things are very small. They  
3 do behave differently. From a toxicology  
4 perspective, when you start to look at the  
5 studies, as well, they are so small, they can  
6 penetrate much further than molecules that are  
7 like them that are bigger can. We've studied  
8 this issue in sunscreens, for example, and we  
9 know that the nanomaterials can actually  
10 penetrate the dermis much further, and get to  
11 places in the body that the regular versions  
12 of those chemicals or minerals cannot. So,  
13 for those reasons, we do think that engineered  
14 nanomaterials should be prohibited in organic  
15 production.

16           With regard to methionine, as  
17 Miles pointed out in the NOP presentation  
18 yesterday, amino acids are not vitamins or  
19 minerals. And so, we wonder about the  
20 rationale in the regulatory framework section  
21 of this recommendation. I think, overall, if  
22 this recommendation were to go through, it

1 would be 16 years of a prohibited material  
2 that is allowed in this feed. That's just not  
3 okay, and I think it really represents a bit  
4 of a breakdown process when it comes to  
5 Sunsetting materials, creating incentives for  
6 organic alternatives to be developed. And  
7 even in reviewing the recommendation, it's  
8 clear that there are many natural materials  
9 that can be explored further.

10 I've met a gentleman who is  
11 producing high methionine corn, and,  
12 apparently, didn't get four grants in the last  
13 several years, because there was no demand,  
14 and there's no interest. So, if you keep  
15 Sunsetting material, or you don't Sunset  
16 materials over and over again, that sends a  
17 clear message to the marketplace that there's  
18 no real need to develop alternatives. And  
19 that's a really big problem, because Sunset  
20 and use of synthetic materials -- and, Joe, I  
21 respectfully sort of disagree with your  
22 concept on synthetics with regard to organic -

1 - but it was designed to use it for a while,  
2 if there aren't any other alternatives. But  
3 as the natural alternatives become available,  
4 that's what needs to move into organic  
5 production. And consumers are trusting you to  
6 implement that process properly.

7 Methionine is an example of a  
8 failed Sunset procedure system, and we really  
9 urge you to start winding this down, to start  
10 Sunsetting this material, put a transition  
11 period in if you need to, but we really need  
12 to be done with this. And it shouldn't take  
13 another five or six years to get that done.

14 In the regulatory framework,  
15 though, if that is the rationale for this  
16 exemption, that it is a vitamin and mineral,  
17 and that is how it's being granted as an  
18 exemption for using a prohibited substance in  
19 organic production, then I would just  
20 encourage you to revisit that in the context  
21 of what Miles had stated yesterday.

22 With regard to classification of

1 materials, I'll tell you, I've been watching  
2 the development of what's synthetic, and  
3 what's not synthetic for the last decade.  
4 And, as a scientist, I'm even getting rather  
5 confused about what this is. And, as a  
6 scientist, trying to educate the public about  
7 what it is your rationale is for what is  
8 synthetic or what isn't, what is natural or  
9 what isn't, it's becoming increasingly  
10 difficult to do that.

11 We felt about a year ago we were  
12 getting on the mark, and then somehow we feel  
13 we've deviated from that point. I think it's  
14 important to avoid the ability to exploit the  
15 classification of a material, so let me just  
16 zoom out for a minute, and say that we think  
17 that this Board should err on the side of  
18 having to review a material that may be  
19 questionable for use in organic production,  
20 and that that should trump the development of  
21 an overworked formula that might actually lead  
22 to an inappropriate material being

1 greenlighted for use in organic production.

2 We are very concerned about many  
3 ingredients that might be listed, and I don't  
4 know if there's been a little bit of a testing  
5 process to this formula, like what synthetic  
6 ingredients are out there that we wouldn't  
7 want in organic production, and could that be  
8 greenlighted in this process?

9 I can't figure out how partially  
10 hydrogenated oil couldn't be done right now  
11 under the current definition. It's a nickel  
12 catalyst, natural oil, little pressure, little  
13 hydrogen gas and you've got hydrogenated oil.  
14 This doesn't prevent that from happening.  
15 And, frankly, we often talk about the natural  
16 label to consumers, and don't confuse natural  
17 with organic, and here's what natural ought to  
18 mean. And that is, if you don't have an  
19 ingredient that grew in nature, you don't have  
20 a natural ingredient anymore. If you  
21 processed it, and it is chemically different  
22 from what it was in nature, you don't have a

1 natural ingredient. You chemically changed  
2 it, and this is Chemistry 101. And I think  
3 there seems to be a drive to redefine what it  
4 is, rather than just saying by following basic  
5 chemistry principles, that's what it is. And  
6 maybe there's a way for you all to  
7 differentiate between products that are  
8 minimally processed, and you could, perhaps,  
9 fast-track that through a different, or  
10 through a shorter chain of evaluation than you  
11 would for a full-blown synthetic TAP review.  
12 But you can't just wave it through. And I  
13 think whatever it is, the recommendation right  
14 now, it doesn't jibe with what basic science  
15 is. So, we think that needs revision. We  
16 think if there's a chemical change, there's a  
17 chemical change, and we think that from the  
18 consumer point of view, they expect you to  
19 review those things, and approve them on the  
20 National List, so that if there are truly  
21 synthetic materials, that you have, in fact,  
22 reviewed them, and decided whether they should



1 be on the list or not.

2 With regard to the Made With  
3 label, consumers have been educated to look  
4 for the organic seal, the USDA organic seal,  
5 to find the most value in organic products.  
6 It's a way for us to help educate consumers,  
7 to tell them if you want the best of the  
8 organic, you need to look for the USDA seal.  
9 By allowing that seal to be used on the Made  
10 With category, it's, we believe, going to lead  
11 to actually more confusion on the marketplace,  
12 and it will, ultimately, confuse consumers  
13 even further.

14 We concur with Patty Lovera that  
15 this is an enforcement issue, and we  
16 appreciate the want to try to clear up this  
17 marketplace confusion, but we think that  
18 products like fish that are carrying an  
19 organic claim, or personal care products that  
20 aren't NOP certified that have an organic  
21 claim, or fertilizers that have an organic  
22 claim that are sewage sludge, those should not

1 be allowed, and that those should be  
2 prohibited, and that those are the direct  
3 confusing factors in the marketplace. It  
4 isn't the Made With so much as it is these  
5 misleading organic-labeled products out on the  
6 marketplace. And, at this point, we can say  
7 if food has an organic claim on the front, it  
8 meets the National Organic Program. And I  
9 think that most consumers understand that, but  
10 it's the other product categories in the other  
11 sectors where there hasn't been any  
12 enforcement action.

13 We're really pleased to see that  
14 the NOP is meeting with the FTC. We're very  
15 happy with that, and we encourage them to not  
16 only talk about personal care products in that  
17 meeting, but also any non-NOP organic claim in  
18 the marketplace. We think it's a really great  
19 opportunity. The FTC is about to issue their  
20 Environmental Marketing Guides again, and it's  
21 an opportunity for FTC to help the agency with  
22 preventing deceptive marketing claims on the

1 marketplace.

2           And, finally, with regard to inert  
3 gases used in the 100 percent organic, I tried  
4 to get a better handle on how inert gases are  
5 produced. It seems to be through fractional  
6 distillation of air, which is how you get most  
7 of these inert gases. And as long as that  
8 process, again, meets with all of the terms in  
9 terms of getting that, making a natural type  
10 of ingredient, we don't have a problem with  
11 the use of inert gases in 100 percent organic.  
12 Thank you.

13           CHAIRPERSON GIACOMINI: Thank you.  
14 Joe.

15           MR. SMILLIE: We may disagree on  
16 the role of synthetics, but we greatly  
17 appreciate the work of Consumers Union in  
18 educating the public about organic, and your  
19 strident support of the organic label as  
20 compared to the natural label. A great deal  
21 of appreciation on that issue.

22           MS. RANGAN: Thank you, Joe.

1 MR. SMILLIE: I'll pass on the  
2 classification, and let my colleagues tackle  
3 that one. But on the Made With, the Made With  
4 label also meets the NOP program. I'm not  
5 arguing for the USDA seal. It's a discussion -  
6 -

7 MS. RANGAN: Oh, we realize --

8 MR. SMILLIE: Yes. And I think  
9 that organizations like yours play a really  
10 important role to bring that awareness to  
11 people that Made With organic products are  
12 certified, that they do meet the National  
13 Organic Program, and that they do help expand  
14 the growth of organics in the industry. And  
15 even though it's not as valid as the organic  
16 label, I think it's an issue of consumer  
17 education, not necessarily the seal. And I  
18 think that's the way we are heading. And  
19 organizations like yours can do a great deal  
20 to help us get that education out there, that  
21 it's not not organic, that it's just not as  
22 good as organic.

1                   And, lastly, I greatly appreciate  
2 your support on the inert gases. As a  
3 distinguished scientist, I'm glad you did the  
4 research to realize that this material is  
5 going to be very helpful to manufacturers, and  
6 doesn't prevent them from using 100 percent  
7 claim.

8                   MS. RANGAN: Thanks, Joe. Just to  
9 respond to your one labeling issue. I mean,  
10 there are other ways besides reducing the seal  
11 in half, and putting it on the back. And we  
12 think it is that seal use that's going to be  
13 confusing. I'm not sure consumers are going  
14 to know bigger versus smaller, and know the  
15 value differential.

16                   Maybe a statement on the back with  
17 the certifier's seal to say, "meets the  
18 standards of the National Organic Program for  
19 this category," I mean, that's a very  
20 transparent, clear way of helping consumers  
21 understand that, while not confusing them  
22 further, and they still being able to

1 differentiate the higher organic categories  
2 with the seal.

3 CHAIRPERSON GIACOMINI: Katrina.

4 MS. HEINZE: Thank you for your  
5 comments on the classification of materials.  
6 Certainly, if it was easy, it would have been  
7 solved a long time ago. Your comments give us  
8 something to think about. I'm interested, if  
9 we just went with chemical change, which is  
10 what we did in the fall, we heard a lot of  
11 public comment that that would then  
12 unintentionally include a lot of agricultural  
13 products that had been processed, and make  
14 those synthetic, and that that would be  
15 confusing to consumers. For example, now the  
16 bread would be synthetic, their yogurt would  
17 be synthetic, and that certified organic  
18 synthetic, while perhaps scientifically  
19 correct, would offend the sensibilities of  
20 consumers. I'm interested what your thoughts  
21 are on that topic.

22 MS. RANGAN: Katrina, I think it's

1 a very difficult line we're trying to tread  
2 here. I think that if there are synthetics  
3 that are appropriate for use in organic  
4 production, and there aren't alternatives,  
5 come clean with the public, and let them know  
6 that that's the only way you can get yogurt,  
7 is to have certain synthetic materials in it.  
8 There's no other way. I think what happens  
9 is, you try to create this paradigm and spit  
10 something out as natural, that scientifically  
11 speaking isn't, and then you get outrage on  
12 the back end with, well, how did you evaluate  
13 this? And then it's, well, we didn't really,  
14 because we didn't need to, and then you back  
15 it up to that rationale. I think that becomes  
16 a challenge for you all, and for the integrity  
17 of organics on the whole.

18 MS. HEINZE: I appreciate that. I  
19 guess my question is not in cases where you've  
20 used synthetics, but in the cases where you've  
21 used a natural. So, for example, or have just  
22 processed it. So, the example we had in our

1 document was a very simple one, but you take  
2 wheat, you toast it, that is chemically  
3 changed. And our definition as it stood in  
4 November, that would be synthetic.

5 MS. RANGAN: Well, I think -

6 MS. HEINZE: And I also go back to  
7 my mom, and those of you who have been on the  
8 Board for a while, she would tell me I was an  
9 idiot if I made that synthetic.

10 MS. RANGAN: Right. And I've been  
11 up here having the same discussion before.  
12 So, the act defines processing, and we have  
13 those terms for what it can be. And I think  
14 there was agreement that if you use those  
15 processing techniques with an ingredient, that  
16 you cook it, you bake it, you dry it, that you  
17 would not need to run it through the mill.  
18 But if you do anything else to it, why  
19 wouldn't you want to run it through the mill,  
20 and why does the mill have to be as  
21 complicated for every single one? If you know  
22 that it's only a minimal processing, and



1       whatever it is, at least it had your eyes to  
2       review. And I think that's the point, is that  
3       the public needs you all to be that box, where  
4       these things input through, there's some sort  
5       of eyeballs and review on it, or a more  
6       extensive review if that's necessary, and then  
7       it comes out the other end. Without that, the  
8       fact that things can sort of land on the  
9       floor, and you all never have seen it because  
10      it was just greenlighted through, that's a  
11      very precarious position to be in, I think,  
12      for this program.

13                   MS. HEINZE: Thank you. That is  
14      exactly what our edition is intended to do, to  
15      say if you process it with these few things,  
16      it doesn't need to go through the mill, but  
17      otherwise it does. And we'll take a look at  
18      other public comments, as well, but that was  
19      an intent to do that.

20                   CHAIRPERSON GIACOMINI: John.

21                   MR. FOSTER: So, one of the things  
22      that's occupied a lot of my time is that

1 complex world that you talked about. I would  
2 love to live in a world where if it's chemical  
3 change, it's chemical change. That's great.  
4 But one thing that's come a little more  
5 clearer for me in the last six months,  
6 particularly, is that there's a difference  
7 between how you define chemical change and its  
8 acceptability to the industry. And even  
9 though I've watched a lot of these meetings in  
10 the last few years, it seems like it's a  
11 subtlety that's now readily apparent. So,  
12 there's been a sharp and painful learning  
13 curve for me in the last few months about  
14 that. That's such a significant difference,  
15 I think it's so subtle that it escapes a lot  
16 of consumers who express discontent. I'm not  
17 sure that they're thinking in those terms.

18 When you had mentioned if it's  
19 chemical change, it's chemical change, so --  
20 and I'm really looking for it, and I want the  
21 answer. Does baking bread -- in my  
22 understanding, there's a chemical change

1       there.  Should that be considered synthetic,  
2       or not?

3                   MS. RANGAN:  No, and we've talked  
4       about this before.  You have processing terms  
5       here, and that was sort of where we -- well,  
6       we agreed with you all that the line should be  
7       drawn last year, but if it was cooked, if it  
8       was dried, if it was evaporated, if it was  
9       grinded, I mean that those are things that  
10      were fine.  But, John, I do have to ask you to  
11      consider why or how a partially hydrogenated  
12      oil right now could get through as organic,  
13      according to this definition.  And I don't  
14      think you intend for that to happen, but that  
15      is, perhaps, an inadvertent consequence of  
16      creating a bigger formula for exempting things  
17      from being reviewed, rather than creating a  
18      narrow formula, and just running through the  
19      review.  And, again, this isn't a matter of  
20      not using it, using it, and maybe you'll deem  
21      some of those things natural on the other end  
22      after you review them, and say, oh, I see how

1 it's done, and so, chemically, it's not any  
2 different, even though lots of synthetics were  
3 used to process the thing. But if it doesn't  
4 have that review, it doesn't have that kind of  
5 credibility that consumers are looking toward  
6 and paying more for, because they think that  
7 that kind of due diligence is being done when  
8 they buy organic products.

9 CHAIRPERSON GIACOMINI: Jay.

10 MR. FELDMAN: Thank you for your  
11 comments. Dr. Rangan, as a toxicologist, I  
12 want to ask you a couple of questions about --  
13 on this classification issue regarding the  
14 significant versus insignificant definition,  
15 which, of course, is not before us here, but  
16 is sort of the foundation on which we are  
17 building this classification discussion. So,  
18 we take a process that involves a chemical  
19 extraction, and we end up with an  
20 insignificant amount of that chemical in the  
21 end product. As a toxicologist, what's your  
22 feeling about that?

1 MS. RANGAN: That you definitely  
2 do have a chemical change. And, Jay, thank  
3 you for bringing up that question. I wanted  
4 to mention that significant change, subtle  
5 change, John, however you want to phrase it,  
6 change is change. And from a chemistry  
7 perspective, it just is change. It requires  
8 your review, whether it's a subtle change,  
9 significant, whatever it is, it requires your  
10 review. I'm sorry, Jay, the last part of your  
11 question on that?

12 MR. FELDMAN: Well, it's just a  
13 question of how - I think you've answered it.

14 MS. RANGAN: Yes.

15 MR. FELDMAN: How should we  
16 address that as a Board? Should we view this  
17 as de minimis and, therefore, not --

18 MS. RANGAN: Yes. No, and I would  
19 also maybe encourage you all to look at what  
20 FDA did with the Corn Refiners Association.  
21 The Corn Refiners Association went to FDA a  
22 few years ago, and wanted to use the term

1 "natural" on high fructose corn syrup-  
2 containing products, and that processing  
3 involves a lot of strong acids and bases, also  
4 bacterial enzymes to make it. And, if you  
5 read through that document, it's pretty dense,  
6 and it kind of takes a scientist to read  
7 through it and tease it out, but what you  
8 realize is that even FDA at that time was  
9 saying, look, we really don't think so, and  
10 the fact that you've run these things on  
11 columns, you load it with an acid, it's only  
12 unless you have zero residue of that acid left  
13 at the other end that they would even  
14 entertain the thought of it being labeled as  
15 natural. So, I think that might help you all  
16 just looking at what little FDA has done  
17 around the natural claim, and it's not enough,  
18 in our opinion, but, even what little they  
19 have done, I think will give you some  
20 indications that certainly if there are  
21 residues left, it's not considered --

22 MR. FELDMAN: Yes. Part of the

1 struggle for us is that once you talk about  
2 zero, you're talking about limits of  
3 detection, and you're talking about a  
4 methodology for that, which, of course, is a  
5 moving target. But, at the same time, the  
6 statute under which we're operating is a  
7 process-driven statute, so the question is  
8 whether you're adding something, not whether  
9 something is remaining. We use residues to  
10 determine whether there's compliance with that  
11 process-driven process.

12 MS. RANGAN: Sure.

13 MR. FELDMAN: And we're getting  
14 caught up in -- and we're back-ending a lot of  
15 our discussion, I think partly because of the  
16 IG report, and the focus on how we're going to  
17 create a new enforcement, better enforcement  
18 system, and we're giving -- we're sort of  
19 forgetting that we're process-driven, and we  
20 don't want those inputs being put in at the  
21 front end, because we know about some of the  
22 deficiencies on detecting them at the back

1 end.

2 MS. RANGAN: That's right. And I  
3 can't agree more, and I think all the  
4 processing aids, and I'll bring up food  
5 contact substances, but it's those things  
6 should be considered, you should be looking at  
7 them. And there are areas -- I mean,  
8 bisphenol A is a classic example of what's  
9 going on right now as a food contact substance  
10 that leaches into food in the cans, that, had  
11 the law not been changed several years ago, we  
12 would be reviewing that material right now.  
13 And consumers ask me all the time, does  
14 organic not have BPA? And that's not the  
15 case, and that's the result of not reviewing  
16 food contact substances, and not really taking  
17 a closer look at processing aids. There will  
18 be more after BPA, but that's an example of  
19 how not paying attention to those things can  
20 sort of bite you on the back end.

21 MR. FELDMAN: Dan, I'm really  
22 sorry about this. I just have one other



1 question. I want to thank you for your  
2 comments on public perception, because I think  
3 on classification that's a really driving  
4 issue for the Board to deal with the fact that  
5 we are approving a lot of synthetics. We do  
6 go through a rigorous review, and we want to  
7 improve that review, but I agree with you,  
8 that we need to have that review and  
9 acknowledge that we do allow synthetics, and  
10 stand behind that. I don't go as far as Joe  
11 goes, I think our default under the statute is  
12 to try to avoid that, to the extent possible,  
13 but we do do it.

14 I need to ask you about inert  
15 ingredients, since you didn't mention that,  
16 and what your feeling is in terms of the Board  
17 authority or responsibility to evaluate inert  
18 ingredients, especially under the new EPA  
19 pending policy on full disclosure.

20 MS. RANGAN: I mean, the Board  
21 won't be happy with what I have to say on  
22 that. You guys, I think you need to review

1       them, and I think that maybe there are places  
2       at EPA, you know, they have this design for  
3       the environment program. There may be an  
4       infrastructure framework at EPA already there  
5       for you to try to use to help expedite the  
6       sort of re-review of some of these things, and  
7       where they're going, but, again, I just think  
8       to greenlight these things, or wave the hand  
9       through, what we're able to tell consumers is,  
10      if there's a synthetic material used in it,  
11      then the Board reviewed it, and that you, the  
12      consumer, can be assured of that. And that's  
13      a very important line in the sand. And if you  
14      start to erode that line, or get rid of it,  
15      that's really going to undermine the integrity  
16      of organics, and what consumers expect out of  
17      it.

18                   MR. FELDMAN: Thank you.

19                   CHAIRPERSON GIACOMINI: Jennifer.

20                   MS. HALL: Thank you, Dan.

21      Urvashi, I'd like to talk to you a little bit  
22      about your comments about the Made With label.

1 And I couldn't agree with you more that I  
2 think the greater consternation lies in the  
3 arenas that are completely not inspected, that  
4 don't have any rules around them with personal  
5 care, and other industries. However, I think  
6 that, in your own words, that what organic  
7 represents is the credibility that consumers  
8 are looking for. And that, up to now, we may  
9 have used that USDA seal as representing the  
10 gold bar, but that, potentially, it has more  
11 value to us if we actually use it as  
12 verification that it has met legal  
13 requirements to be in a certain category. And  
14 Made With is a legitimate category of organic,  
15 so to the extent that we refer to it as kind  
16 of the ugly stepchild, because it's less  
17 perfect, I don't think that does any good. I  
18 think that we need to promote the industry as  
19 a whole, and those products are 70 percent  
20 better than their conventional counterparts.  
21 So, I think that your group and others have  
22 done incredible work to establish a value with

1 the seal and the recognition of what that  
2 means, and that there's an opportunity to  
3 expand the credibility of all of organic, and  
4 recognizing all of the work that's done in the  
5 industry, even with the Made With category.  
6 And that the fact that at least the seal on  
7 every single thing that has gone through  
8 organic certification does start to spread the  
9 waters. It either has been inspected and is  
10 verified, or it's not, and there does become  
11 a clear divining rod then between those  
12 industries that are just making claims that we  
13 don't have a handle on yet, or may never ever,  
14 and those that are legitimately inspected and  
15 certified.

16 MS. RANGAN: Thanks, Jenny. I  
17 appreciate your comments, and I -- in reading  
18 through that recommendation, I really  
19 empathize with the Board. And it's something  
20 we have to educate consumers on too. And we  
21 agree, there is legitimacy to that, to the  
22 Made With organic label. We completely agree

1 with you.

2 I think it's in the way it's going  
3 to be denoted, that will actually have an  
4 inadvertent consequence of muddying it up for  
5 the consumer. And the reason I say that is  
6 because every time -- I mean, even today after  
7 a decade of this program being in place, I  
8 still have to deal with reporters in talking  
9 about the three tiers of organic, and meeting  
10 wonderment when they hear that. And people  
11 don't know there are three tiers of organic  
12 labeling. They don't know how they're  
13 supposed to figure that out. And the USDA  
14 seal has enabled us to tell people that those  
15 are the top levels of organic. It enables us  
16 to help guide people toward the most  
17 meaningful organic products on the market, and  
18 that's not an attempt to discredit the Made  
19 With category, and that's why I really do  
20 encourage some sort of, "meets the standards  
21 of the National Organic Program" on the back  
22 of it, so that it is clear to consumers that

1 those products do meet the standards of the  
2 National Organic Program.

3 I would just really caution that  
4 the seal may confuse people's ability to  
5 discern between those that are made with  
6 organic, and those that are organic, and those  
7 that are 100 percent organic. And right now,  
8 we actually have a way to differentiate better  
9 on those categories, but with the seal, it  
10 becomes increasingly difficult if you throw  
11 that on the third tier. So, that's why we  
12 would like to see some sort of disclosure on  
13 the back that it does meet the standards of  
14 the National Organic Program, so that it's  
15 very clear to consumers that you save that  
16 seal for the most meaningful organic products  
17 on the marketplace.

18 CHAIRPERSON GIACOMINI: Thank you.  
19 I'd like to remind the Board members that cots  
20 will not be brought in, and to please try and  
21 stay focused on -- thank you, Urvashi. Didn't  
22 mean to take that off at all, but please try

1 to stay focused on the questions, not  
2 discussions of your agreement and disagreement  
3 at this point in time.

4 Is Charlotte -- Will, do you have--  
5 MR. FANTLE: Charlotte is not  
6 here. She is seven months pregnant, and  
7 decided to remain in Boston. We are going to  
8 cede her time to a producer from Pennsylvania  
9 who came out here.

10 CHAIRPERSON GIACOMINI: Okay. We  
11 are going to take this one. Are you already  
12 on the list?

13 MR. BAKER: Via Cornucopia, I'm  
14 not on the list.

15 CHAIRPERSON GIACOMINI: Okay.  
16 Let's try and keep this organized through  
17 Valerie, please, these kind of switches.  
18 We're going to do one more, then we'll take  
19 our break and give everyone a chance to  
20 stretch their legs. Thank you.

21 MR. BAKER: Thank you. John Baker,  
22 President of Giving Nature Foods. Regarding

1 the review of NOP standards affecting outdoor  
2 access for egg-laying hens, and whether or not  
3 it should be defined as providing a pastured  
4 environment for organic layers, I would like  
5 to make the following comments.

6 In my opinion, no one can question  
7 that consumers expect organic egg producers to  
8 provide pasture for organic laying hens.

9 Also, in my opinion, no one can deny that the  
10 consumers who buy organic eggs expect them to  
11 be from anything other than from pastured  
12 hens. The term outdoor access was created to  
13 replace pasturing as a term to describe the  
14 environment that should be provided to organic  
15 laying hens. I will not conjecture on why  
16 this was decided upon, but will only say that  
17 I believe it falls far short of the  
18 expectation of the organic egg consumer.

19 Testimony that comes from  
20 representatives of large-scale CAFO,  
21 concentrated animal feeding operations,  
22 organic egg producers whose interests dwell on



1 keeping the standards as they are, and whose  
2 only result, should their desires be  
3 actualized, would, I believe, be the continued  
4 warping of the term "organic" to fit such a  
5 large-scale CAFO monoculture production model.

6 For the record then, I would like  
7 it to be known that as an organic egg supplier  
8 to the Mid-Atlantic and Greater New York City  
9 region of the United States, and whose scale  
10 of production includes 130,000 plus organic  
11 laying hens, I, without exception, support the  
12 following standards for organic egg laying  
13 hens, and that such standards be a replacement  
14 for the current NOP standard regarding outdoor  
15 access, as it pertains to organic laying hens.

16 All organic laying facilities  
17 should have pasture available to them at least  
18 120 days of the calendar year. Such pasture  
19 must be maintained with at least 75 percent  
20 vegetation during the time the laying hens  
21 have access to pasture. The standard of  
22 maintaining 75 percent vegetation during

1 pasture access should be used as a baseline  
2 when determining the requirement of outdoor  
3 square footage per bird. Anything less will  
4 result in bare ground devoid of fulfilling the  
5 pasture concept's true intent.

6 I believe these standards are  
7 achievable under most climate conditions in  
8 the United States that an organic egg producer  
9 would encounter. Wherever they are not  
10 achievable, then those areas of the US should  
11 be deemed unfit for organic egg production,  
12 and those egg producers that are currently  
13 producing organic eggs in those areas can  
14 enter other existing vibrant markets, such as  
15 cage-free egg production. Thank you.

16 CHAIRPERSON GIACOMINI: Questions?  
17 Jeff.

18 MR. MOYER: You said you have  
19 130,000 birds. Is that correct?

20 MR. BAKER: Yes, sir.

21 MR. MOYER: How many acres are  
22 you --

1 MR. BAKER: Well, we're just now  
2 transitioning them all into pasture, so we're  
3 going to attempt to have them all transitioned  
4 within the next three years. We have about a  
5 quarter of them going into transition now, and  
6 next year we'll do the same. Because of the  
7 way the standards are written, it was hard to  
8 find a farmer that was willing to go to that  
9 extent for the level of production that we  
10 needed to satisfy our customers. So, over the  
11 years, we've advocated for outdoor access, the  
12 greater standard than what is now available,  
13 in fact, that they should be pastured. What  
14 we've done is, we've asked the people that are  
15 willing to participate in the program right  
16 now, which is about a quarter of our  
17 production, we've asked them to take a 15-foot  
18 buffer that's around the house that has to be  
19 done anyway as a result of organic  
20 certification, and we've asked them to put  
21 them out on that pasture area. That's not  
22 adequate, but it begins that process, and then

1 the buffer that will come out around that 15  
2 feet that goes around the house will be made  
3 even larger to finally be adequate to maintain  
4 75 percent vegetation, like I just described.  
5 So, we're in the process, ourselves, and I  
6 would recommend that, too, in terms of  
7 reviewing this, because most people don't have  
8 their birds outside if they're supplying any  
9 type of size of production.

10 MR. MOYER: I guess, to be a  
11 little more specific, within your farm or your  
12 region in the northeast, if you have 130,000  
13 birds, how many square feet per bird are you  
14 allowing, or how many acres is it going to  
15 take you for 130,000 birds?

16 MR. BAKER: We're still going  
17 through that process ourselves.

18 MR. MOYER: So, you don't know.

19 MR. BAKER: No, but we're going to  
20 have to -- we'll find out as we go along how  
21 much we actually do need. I think to try and  
22 have a target with an exact amount of acreage

1 needed right now isn't practical, because you  
2 may end up requiring too much acreage, or not  
3 enough. It's going to depend on the area that  
4 you're in, and what the experience is of the  
5 growers. Because we've gone through decades  
6 of not doing this, all that kind of knowledge  
7 is really lost, nobody really knows.

8 MR. MOYER: And how many hours a  
9 day do you expect the birds to be on that  
10 pasture?

11 MR. BAKER: I would probably defer  
12 to my Culture Management Service. Mel. What  
13 would you think they would be outdoor access?  
14 Minimum of four. Okay. Maximum? Four to  
15 ten.

16 MR. MOYER: Thank you.

17 MR. BAKER: Yes.

18 CHAIRPERSON GIACOMINI: Any other  
19 questions? Seeing none, thank you. We will  
20 take our break. We will stay on schedule, and  
21 bring you back together, reconvene at 10:00.

22 (Whereupon, the above-entitled

1 proceeding went off the record at 9:51 a.m.,  
2 and resumed at 10:10 a.m.)

3 CHAIRPERSON GIACOMINI: Okay. We  
4 have a quorum, and we'd like our first --  
5 where did my list go? Will Fantle with a  
6 proxy -- Will, do you have a proxy?

7 MR. FANTLE: Yes.

8 CHAIRPERSON GIACOMINI: Okay.  
9 With a proxy, and then Walter Goldstein, and  
10 Steve Ricke on deck and in the hole.

11 MR. FANTLE: My name is Will  
12 Fantle. I'm the Co-Director of the Cornucopia  
13 Institute. We have approximately 3,500  
14 members across the country predominantly  
15 certified organic farmers as that membership,  
16 and I'm here representing the organization.  
17 We provided detailed comments to the Board on  
18 a number of the agenda items. I'm going to  
19 highlight some of those portions of the  
20 comments.

21 The first area I want to talk  
22 about is the Livestock Committee's request for

1 public input regarding stocking rates. We're  
2 concerned that the scope and magnitude of the  
3 area of regulatory oversight that's being  
4 suggested in this document warrants more  
5 extensive and greater public participation.  
6 And what we would suggest as a model for that  
7 is something that works successfully, we  
8 think, on the pasture rule. And that was the  
9 symposium that was held at State College  
10 Pennsylvania in 2006 that brought together a  
11 wide variety of producers from across the  
12 country who were able to generate a  
13 significant amount of discussion, and we  
14 think, ultimately, coalesced around a proposal  
15 that led to, eventually, what became the  
16 Pasture Rule that was released this last  
17 February. We think that's a good model to use  
18 for this going forward.

19 We would also suggest that the  
20 Board take a look at the document that was  
21 produced by Dr. Kathleen Merrigan, and Dr.  
22 Lokeretz when Dr. Merrigan was at Tufts, and

1 that dealt with this very issue of animal  
2 welfare and stocking ratios. In fact, the  
3 document that they jointly produced was a  
4 review of seven different organic standards  
5 designed for use by the NOSB and the NOP. And  
6 we think that would be useful for you to have,  
7 in addition to the three documents that were  
8 provided to you in your materials for  
9 discussion of this item.

10 The other aspect of this I want to  
11 mention is the organic egg sector. Later this  
12 year, our organization will be releasing a  
13 report based upon the extensive research that  
14 we're currently doing, and have been doing for  
15 the last year and a half into organic eggs.  
16 We've been doing survey work of organic egg  
17 producers. We've been visiting farms. We've  
18 been talking to people involved in the  
19 industry.

20 Generally, I can tell you right  
21 now, what we have uncovered is that most of  
22 the smaller scale organic producers would be



1 able to meet any of the standards that are  
2 mentioned in the appendices that you have  
3 received. In fact, they could probably go  
4 beyond those standards. We don't think,  
5 however, from what our research has found that  
6 many of the large-scale organic egg-laying  
7 operations can do that. In fact, we think  
8 they would need to remodel their hen houses,  
9 and potentially dedicate or acquire additional  
10 land to allow them to comply with what's even  
11 the lowest proposed numbers, meaning those  
12 highest densities that you're considering.

13           And I'd also like to note that  
14 it's very difficult for some of the smaller  
15 and mid-sized operations to come to events  
16 like this. They rely on organizations, such  
17 as ours, and others to share information with  
18 them. And this is one more reason, I think,  
19 for you to consider a symposium that would be  
20 a focal point for attention on this issue, and  
21 allow for these other producers to gather, and  
22 talk, and share information with you, and

1 dialogue with you.

2 The larger producers, as you  
3 recall from your November meeting, were able  
4 to send their representatives. I know that  
5 many of them are here again today, and we're  
6 concerned that you're only hearing one voice,  
7 and we would hope that you would broaden your  
8 activities, and try and include those other  
9 voices in this discussion.

10 Accessory nutrients, we were  
11 pleased by the announcement from the Program  
12 yesterday indicating that accessory nutrients  
13 are not on the National List. This is  
14 something that some of you may recall we filed  
15 a formal complaint with the Program on several  
16 years ago, saying that this was, indeed, the  
17 case. That complaint was dismissed by the  
18 prior Program Management. We re-filed that  
19 complaint last week, and I would hope that you  
20 would again just take a look at that, because  
21 one of the key components of this has been the  
22 suggestion going forward that you're going to

1 allow a transition time for businesses to  
2 remove some of these ingredients from their  
3 product. We don't have a problem with that.  
4 What I would suggest to you is that some of  
5 these ingredients are not, necessarily,  
6 benign. DHA, in particular, in infant  
7 formula, we have gathered and collected  
8 through our Freedom of Information Act request  
9 with the Food and Drug Administration a number  
10 of adverse reactions to that, scores of those,  
11 which indicate that for a small subset of  
12 infants, explosive diarrhea and vomiting are  
13 the result of taking formula which seems to  
14 clear up like that as soon as they switch to  
15 a formula that doesn't have DHA in it. So,  
16 please bear that in mind as you weigh how to  
17 proceed on this issue, that there are some  
18 infants that, perhaps, are needlessly  
19 suffering because of some of these  
20 ingredients.

21 As for Made With Organic, and the  
22 use of organic in company names, we believe

1 that use of a USDA seal for Made With Organic  
2 Product will dilute the value of organic, of  
3 100 percent organic products, and we object to  
4 the usage of any type of seal, any color or  
5 size on any Made With Organic product. We  
6 welcome companies that are willing to move  
7 forward and invest in putting 70 percent of  
8 organic ingredients, or perhaps more, in the  
9 products, we think the gold standard remains  
10 the seal, and we think, in fact, we fear that  
11 that will be watered down, or diminished in  
12 value for those companies that are engaged in  
13 organics, and are providing 100 percent or 95  
14 percent.

15 We also have a complaint that I  
16 think many of you are aware of pending before  
17 the NOP dealing with the use of the name, or  
18 the word "organic" in a company name on a  
19 product. I won't go into details on that,  
20 because I know you've seen that, and I think  
21 you'll be processing that, but we do think  
22 that's something that you're going to need to

1 take action on to insure that organic and a  
2 company name does not mislead consumers as to  
3 what's actually in the product.

4 The last item I want to point to  
5 is something that was not on your agenda, and  
6 something we would encourage you to be engaged  
7 with in the future, and that's the proposed  
8 exemption from pasture for beef. We're  
9 disappointed that the National Organic  
10 Standards Board did not have an opportunity to  
11 weigh in on this exemption. This actually has  
12 been much of the case with this proposal, the  
13 Pasture Rule going on for the past couple of  
14 years, and we would urge the Program in the  
15 future to recognize the importance of you,  
16 your input and your involvement in any future  
17 rulemakings that are involved.

18 I'll just briefly say a couple of  
19 things about the beef proposals that we  
20 suggested. We again surveyed, and went out  
21 and talked with beef producers across the  
22 country, and dairy producers that also sell

1 slaughter stock. What we discovered,  
2 actually, was a little surprising to us, that  
3 upwards of 80 percent of the nation's organic  
4 beef producers are exclusively or primarily  
5 grass-based until slaughter. They don't need  
6 an exemption.

7 On the other hand, upwards or  
8 close to 20 percent of organic beef producers  
9 do currently use green finishing and a feed  
10 lot setting. These producers, many, are  
11 family scale and run family operated farms,  
12 and they need an exemption to stay in  
13 business. So, we're sort of neutral on the  
14 exemption, but we did come up with a proposal  
15 that would, we think, accommodate several  
16 different production schemes, as well as  
17 provide transparency for consumers going  
18 forward. One would be organic green finished,  
19 organic 100 percent grass fed, and then there  
20 are producers who keep their animals out on  
21 pasture, and will bring some amount of grain  
22 out to them for the duration of their lives,

1 and that would be animals finished on pasture  
2 with green supplement. So, as I said, we  
3 think this will lend transparency to the  
4 process. It'll provide options for producers  
5 going forward to meet the demands of  
6 consumers, as well as allowing the market to  
7 help sort out which style of operation that  
8 consumers and producers are able to support.  
9 So, thank you for this opportunity.

10 CHAIRPERSON GIACOMINI: Any  
11 questions? John.

12 MR. FOSTER: The numbers you were  
13 talking about about beef producers, that 80  
14 percent, 20 percent. Was that number of  
15 animals, or number of producers?

16 MR. FANTLE: Number of producers.

17 MR. FOSTER: Okay.

18 MR. FANTLE: The number of animals  
19 has probably flip-flopped for those two  
20 ratios.

21 MR. FOSTER: Thank you.

22 CHAIRPERSON GIACOMINI: Tracy.

1 MS. MIEDEMA: Mr. Fantle, I  
2 wouldn't need you to reply to this here and  
3 now, but in your written comments, and in your  
4 comments today on the topic of accessory  
5 nutrients, you use words like "explosive" and  
6 "suffering," very hyperbolic language. This  
7 appears to be some sort of narrative research.  
8 If you have any peer reviewed research on this  
9 topic, would you share it with this Board?

10 MR. FANTLE: I will try and get  
11 you the reports that we have from the medical  
12 community, and the FDA on that. There has  
13 been no -- actually, it's interesting you  
14 should mention peer reviewed, because the --  
15 when the FDA granted approval to Martec for  
16 use of this product in foods, they asked them  
17 with a generally recognized as safe  
18 designation for the company to provide ongoing  
19 updates, do follow-ups to any type of  
20 reporting that they're receiving back. The  
21 company has not done that, so that's one of  
22 the deficiencies that's out there, and the



1 omissions that we think that has been allowed  
2 on this product. I will try and get to you,  
3 I will talk to Charlotte, our researcher who's  
4 collected this information, some overview and  
5 synopsis, and some of the actual medical  
6 reports.

7 CHAIRPERSON GIACOMINI: Thank you,  
8 Will. Next, Walter Goldstein, Steve Ricke,  
9 and David Martinelli on deck, or in the hole.

10 DR. GOLDSTEIN: I'm Walter  
11 Goldstein. I work at Michael Fields  
12 Agricultural Institute in Southeast Wisconsin  
13 as Research Director. I've been involved  
14 since 1989 in breeding corn for organic  
15 farmers. The interest was in quality, in  
16 particular, in nutritional value.

17 I'd like to talk with you about  
18 our project to breed methionine corn. It's a  
19 development project. It's something that  
20 comes under pressure. As you all know,  
21 methionine is a hot topic. There's three  
22 different issues that I need to talk with you

1 about. One of them is yield, the second is  
2 quality, and the third is speed, and funding,  
3 and so on, some of the issues that were  
4 brought up earlier by three other people on  
5 this issue.

6 I can refer you, actually, to a  
7 set of slides that are being shown right now.  
8 We're breeding high methionine corn, and high  
9 lysine corn that comes in the same sort of  
10 package. We have two different types of high  
11 methionine corn that we've identified. One of  
12 them has a hard kernel and the other has a  
13 soft kernel. And the hard endosperm sources,  
14 the harder kernel types, are high protein  
15 corns. They're more subject to fluctuations  
16 in protein content, but they're easier for us  
17 to immediately get something out to farmers  
18 on. The soft endosperm corn has a higher  
19 lysine and methionine content than the hard  
20 kind, and we have done feeding trials with the  
21 soft kind, together with Organic Valley and  
22 the University of Minnesota, where we found

1       that it replaced synthetic methionine in the  
2       diet for broilers and for layers with the soft  
3       kind. The hard kind we haven't done feeding  
4       trials on.

5                   We have also had some problems  
6       with yields. The first two sets of hybrids  
7       that we put out, the first set was about a  
8       third less yield than normal hybrids, the  
9       second set was about a quarter less yield, and  
10      that was something that was actually  
11      considered not to make this product fly.  
12      Could we have the next slide, please?

13                   We had a third set. We've been  
14      learning as we go along here. The third set  
15      looked a lot better. We did trials on nine  
16      organic and nine conventional sites, together  
17      with a set of seed companies, and USDA, and  
18      this year the high methionine hybrids, these  
19      are all hard endosperm, the hard type, yielded  
20      87 percent as much as normal commercial  
21      hybrids, so we're climbing up there. It did  
22      seem like the ones that did better under

1 organic conditions were not the ones that did  
2 as well under conventional conditions, and so  
3 on, so that actually breeding under organic  
4 conditions did make a difference. So, we've  
5 got something that's looking fairly nice in  
6 terms of yields. Next slide, please.

7 So, to evaluate differences, we  
8 have looked at quality of our varieties. And,  
9 generally, we are -- on these particulars,  
10 these hard endosperm types, they are high  
11 protein corns. And, on average, we had 12.9  
12 percent protein on a total dry basis for these  
13 corns, and .28 percent methionine. It's a  
14 little bit lower methionine than we'd like to  
15 have. We'd like to have about .3, but that's  
16 what we got, and that contrasts with about 8-  
17 1/2 percent protein for the normal hybrids.  
18 And this is pretty typical of results that  
19 we've had in the past at our research stage.  
20 So, essentially, what we're doing is we're  
21 breeding high protein corn that has a lot of  
22 methionine in it. It doesn't lose its

1 methionine as the protein content goes up.

2 Well, all right. So, we have made  
3 some gains. We're making gains in yield, but  
4 we also, on the other hand, we've been  
5 involved with Methionine Task Force in a  
6 project where they have been funding, more or  
7 less, seed production, not research, but seed  
8 production. And there the results were -- next  
9 slide, please. If you look at some of the --  
10 these show some of the results that we've had  
11 on different farms, and we can see that on two  
12 of the farms, the lower two, we simply didn't  
13 get the protein that we would have expected,  
14 that we normally get. So, certainly, less  
15 than 12 percent. And this is part of the  
16 variation that we know that we have in the  
17 hard endosperm types, that if they don't make  
18 the protein content, they're not going to have  
19 the methionine. Unfortunately, I think the  
20 Methionine Task Force having invested so much  
21 in growing this seed is going to be feeding  
22 it. And I'm not sure that the results will

1 actually show the full potential of high  
2 methionine corn. Above it you can see the  
3 flowery type, or the soft type, and it  
4 preserves its methionine content even at lower  
5 protein levels. Next slide. And here, the  
6 little round balls here show the soft type,  
7 and the little triangles show the hard type,  
8 if you look at methionine as a function of  
9 protein.

10 If you want me to talk about  
11 funding, I could go on, and speed.

12 CHAIRPERSON GIACOMINI: Any  
13 questions? I have a -- or Jeff, go ahead.

14 MR. MOYER: Yes, Walter. I'm just  
15 wondering if through this research, how much  
16 of this was actually done on organic farms?  
17 You said some -

18 DR. GOLDSTEIN: Everything.

19 MR. MOYER: This was all done on -

20 DR. GOLDSTEIN: Except, remember I  
21 said nine organic sites, and nine  
22 conventional, but, otherwise, everything has

1       been done on organic.

2                   MR. MOYER:   And are these germ  
3       plasms patented?

4                   DR. GOLDSTEIN:   No.

5                   MR. MOYER:   Okay.   Thank you.

6                   CHAIRPERSON GIACOMINI:   So, in the  
7       -- we found a variety of corn, the soft has a  
8       higher -- methionine is a higher percentage of  
9       protein than traditional.   And the hard just  
10      has more total protein with traditional  
11      methionine as a percent of protein.   Is that  
12      correct?

13                  DR. GOLDSTEIN:   Yes, let me -- can  
14      I rephrase that?   I would say that the hard  
15      has a more fixed level of protein in it.   It  
16      doesn't compensate for a low protein level, so  
17      if you have a farm where protein content is  
18      low because of the growing conditions -

19                  CHAIRPERSON GIACOMINI:   Right.

20                  DR. GOLDSTEIN:   -- it's not going  
21      to have high methionine.   With the soft kind,  
22      it will have a higher methionine content, even

1 at a low protein content.

2 CHAIRPERSON GIACOMINI: Okay.  
3 Have you pushed the numbers if -- in trying to  
4 meet methionine requirements with your corn,  
5 how much of the corn in a traditional diet  
6 would need to be this corn to meet methionine,  
7 or would that meet the methionine?

8 DR. GOLDSTEIN: We've done two  
9 feeding trials, one with the University of  
10 Minnesota, and one with Organic Valley, and  
11 both have shown total replacement of the need  
12 for -- relative to synthetic methionine in the  
13 diet by using the soft kind. So, in terms of  
14 actual performance, they have performed as  
15 well as synthetic methionine in the small  
16 tests that have been done so far. I hope that  
17 answers your question.

18 In terms of the actual number  
19 pushing, what it looked like is that we want  
20 to get around .3 percent methionine in terms  
21 of totally --

22 CHAIRPERSON GIACOMINI: But of the



1 corn in the diet, was it all this corn that it  
2 took to get that amount of methionine?

3 DR. GOLDSTEIN: Yes, yes, yes.

4 CHAIRPERSON GIACOMINI: Okay. And  
5 then going back to Jeff's question, this would  
6 be public domain knowledge, this seed?

7 DR. GOLDSTEIN: We are a non-  
8 profit NGO public organization, and all our  
9 information is given out in field days, and on  
10 our website, and so on.

11 CHAIRPERSON GIACOMINI: But for -  
12 - the seed stock would be available to -

13 DR. GOLDSTEIN: The seed stock is  
14 available. We will license it to seed  
15 companies. We have given away things to  
16 farmers. We do work with farmers, we work  
17 with Practical Farmers of Iowa, and they test  
18 our stuff, so we have very much of a farmer  
19 involvement in what we're doing.

20 CHAIRPERSON GIACOMINI: Jay.

21 MR. FELDMAN: Thank you. I'm  
22 curious as to your opinion on what the

1       disincentives are for an expansion of the  
2       application of your research either in law, or  
3       as a function of funding, and what you believe  
4       the Board, the NOSB should do to help  
5       facilitate a transition, and an expansion of  
6       the hybrid that you've developed?

7                   DR. GOLDSTEIN: Thank you very  
8       much for that question. We have, in terms --  
9       this is a development process, and any  
10      development process is going to involve time,  
11      mistakes, learning curve, and so on. And any  
12      development process will occur, to a certain  
13      extent, in relationship to funding, how much  
14      money can you actually devote to the task.

15                   We have submitted three proposals  
16      to SARE and been turned down, and two to OREI  
17      and been turned down. The comments have been  
18      that, mostly, that we don't want to see corn  
19      be the solution. We're interested in a  
20      systems approach. That's, basically, it.  
21      Now, I don't know if the movie "King Corn" has  
22      influenced that, or if it's -- what, exactly,

1 it's coming from, but it's very disappointing,  
2 and very difficult. Organic farmers need  
3 corn. It's one of their most productive  
4 crops, and it's very useful.

5 I would like to make the point  
6 that corn -- that high methionine corn is not  
7 -- is scale neutral. I, myself, have a flock  
8 of birds. I feed them through the growing  
9 season, and they do very well because they  
10 have high methionine corn. They go outside in  
11 the wintertime. I think the high methionine  
12 corn is especially important for them. So, I  
13 think we're dealing with a scale neutral  
14 thing, and it's been somewhat politicized, and  
15 that's probably the reason why we're not  
16 getting funding here. I'm hoping that those  
17 who are opposed to large-scale operations that  
18 don't allow chickens outside, or minimal use  
19 of that will understand that, that this is not  
20 something that is a silver bullet for just  
21 large-scale operations. It's something that's  
22 going to affect small and large.

1                   In terms of what can be done, I  
2                   would greatly welcome it if you would please  
3                   consider helping to further this sort of work.  
4                   Research needs to be done, it costs money.  
5                   The Methionine Task Force has been engaged in  
6                   producing seed for trials. It's put up money  
7                   for doing that. It has not put up money for  
8                   research in terms of breeding because, in  
9                   part, that money could be available from other  
10                  sources. But that money isn't coming  
11                  available from other sources. Could you ask  
12                  OREI, could you ask ARS for funding sources to  
13                  be devoted to developing some of these things  
14                  that the organic industry needs, such as high  
15                  methionine?

16                   MR. FELDMAN: Just a quick follow-  
17                   up. We can ask, but, obviously, that's not  
18                   within the purview of the Board. I guess my  
19                   question is, if this Board were to take some  
20                   of the actions that have been recommended in  
21                   public comment to cut this thing off, or to  
22                   phase it down quickly, would the market fill

1 that gap and provide the kind of methionine  
2 that's necessary, or appears to be needed in  
3 the production, on the production side?

4 DR. GOLDSTEIN: That depends on  
5 the industry, itself. The Methionine Task  
6 Force has been very helpful with us in terms  
7 of joining forces, in terms of asking for  
8 money from federal sources. We did, in terms  
9 of private investment, we did see a drop after  
10 the Board allowed synthetic methionine to be  
11 used until 2010. In terms of interest, in  
12 terms of feeding trials, I think there was a  
13 clear drop in interest. And I think that's  
14 something I would like you to take into  
15 consideration. Perhaps, I've heard from Dave  
16 Martinelli about the proposed drop, or  
17 reduction, the possible plan for reducing  
18 methionine over time. I think phasing out the  
19 use of methionine is something to be  
20 considered, the actual speed may affect to  
21 what extent we can help.

22 We have been able to do research

1 in this area with money from other sources.  
2 At the moment, we are very limited. We no  
3 longer have a winter nursery, our time of  
4 getting varieties out has been cut in half, so  
5 it does make a difference. I know there's  
6 people sitting on the line, there's people who  
7 like to see synthetic methionine continue  
8 because of ease, and there's a lot of inertia  
9 in the system. And I really do think that  
10 some strong changes are necessary if this is  
11 going to happen. It has to be driven by need.

12 CHAIRPERSON GIACOMINI: Thank you.  
13 Any further questions? Thank you. Dr. Steve  
14 Ricke, David Martinelli, and Greg Herbruck in  
15 the hole.

16 DR. RICKE: Good morning.  
17 Everybody hear me okay? I am Steve Ricke from  
18 the University of Arkansas, and what I want to  
19 talk to you a little bit about is some  
20 progress we've made on a project funded by the  
21 Methionine Task Force, which takes a little  
22 bit different tact than what's been talked

1 about some today, but addresses the methionine  
2 issue as it's been discussed today, to some  
3 extent. And what we've done is, basically,  
4 look at what would be called microbial  
5 overproduction of methionine as it pertains to  
6 alternative sources of methionine, as opposed  
7 to the normal crystalline methionine that's  
8 used in conventional industry, and obviously  
9 used in these associations, as well.

10 And, basically, the premise of  
11 what we've looked at here is, is to be able to  
12 isolate out in nature methionine-producing  
13 bacteria from a variety of different sources,  
14 and then examine their ability to overproduce  
15 methionine, and excrete methionine out into  
16 the media, or the environment, or whatever,  
17 and whether that has a potential availability  
18 as a methionine source. And then the second  
19 thing, obviously, that goes in hand with that  
20 is assessing the potential for methionine  
21 production, and quantitating that, and  
22 figuring out how much we might actually get

1 out of that. Can I have the next slide,  
2 please.

3 And this is just the results, and  
4 I can certainly provide more details, as  
5 needed. But, so far, what we've been able to  
6 do based off the funding we've had is we've  
7 isolated 38 methionine-producing bacteria  
8 sources. These comes from a variety of  
9 sources. Nine of these actually came from the  
10 chicken gastrointestinal tract, which we were  
11 excited about to some extent, because that may  
12 have some other possibilities, as well.  
13 Others came from the ruminant of the cow, some  
14 came from soil, and a pretty wide range of  
15 environments, which I think really gets us  
16 excited to some extent about where we can go  
17 with this.

18 We screened for overproducing by  
19 basically using methionine analog norleucine.  
20 Methionine overproducing organisms that occur  
21 in nature naturally are norleucine tolerant,  
22 so it makes for a ready fast screen, which we



1 can run from a plating standpoint. We have  
2 just completed here recently, we've ID'd a  
3 couple of the more tolerant strains using 16S  
4 RNA. We know what they are now, and that's an  
5 important part of the process, because once we  
6 know who the organisms are, we can get a much  
7 better idea on how to grow them initially, and  
8 how to optimize that growth. And, therefore,  
9 start to strategize on how to optimize our  
10 methionine production. So, we just recently  
11 completed that. We have a pretty good idea of  
12 at least two of the organisms, and what they  
13 are, so now we're in the process of developing  
14 that media, the media for growing these  
15 organisms, and coming up with ways to optimize  
16 methionine production.

17 And, finally, where we're at now  
18 is, is we're starting to assess methionine  
19 production capacity so that we can come up  
20 with some quantitative numbers in terms of how  
21 much methionine would be produced. Our  
22 overall goal on this thing is to come up with

1 something that could be used in the industry  
2 much like synthetic methionine, or crystalline  
3 methionine is used now, but now this is  
4 derived from an organic source. And the  
5 potential, I think, is definitely there.

6 We're in the initial stages of this. Again,  
7 we want to thank, again, the Methionine Task  
8 Force for funding us to initiate this process.

9 I'm trained as a microbiologist,  
10 so this very much fits into my bailiwick, so  
11 to speak, in terms of the sorts of things that  
12 we're interested in. And this is not a new  
13 technology. I mean, a lot of amino acids in  
14 the past, certainly in Japan and other places  
15 have been produced by these processes using  
16 natural bacterial isolates in nature that  
17 overproduce amino acids, and excrete those  
18 amino acids. So, it's not uncommon. You do  
19 find them in gastrointestinal tract systems,  
20 as well, and I think really where we're at is  
21 trying to figure out a way to focus this,  
22 harness this potential, and then come up with

1 an industrial-scale process that can actually  
2 be useful to the industry.

3 I think as protein sources get to  
4 be more variable and valuable in terms of not  
5 just the organic industry, but the  
6 conventional industry as well, I think there's  
7 real need for some alternative approaches to  
8 how to do some of the amino acid balancing in  
9 diets, et cetera. And with that, I thank you  
10 for having me here, and I'll be happy to  
11 answer questions.

12 CHAIRPERSON GIACOMINI: Jeff.

13 MR. MOYER: Thanks, Steve. That's  
14 very interesting work that you're doing there.  
15 Best case scenario, how long before, if  
16 everything went well, that kind of a process  
17 would yield commercially available methionine?

18 DR. RICKE: Well, I anticipated  
19 that question and, unfortunately, I don't have  
20 a real good answer for it. We're in the  
21 beginning stages. We know who the organisms  
22 are, so with that, we're working out how best

1 to grow them now. I think the next stage is  
2 going to require a couple of things. And I  
3 know you've heard this several times now,  
4 additional funding. Us folks in academics  
5 are, in particular, guilty of making that plea  
6 all the time, but where we need to go next is  
7 to tie-in with a chemical engineer, somebody  
8 who can help us with the scale-up part. In  
9 other words, come up with ways to design --  
10 come up with a good size fermenter that could  
11 actually help us to collect the amino acid,  
12 come up with a good collection process, which,  
13 obviously, would be compatible with an  
14 organic-type process.

15 The nice thing is with these  
16 excreting organisms, is the amino acid is put  
17 out into the media, so there's no chemical  
18 extraction per se required. So, I'm  
19 optimistic, give us a couple of more years, I  
20 think we'll definitely be in the process of --  
21 I can come before you again, I think, and be  
22 able to lay out some actual game plans.

1                   The real question here is, is how  
2                   many organisms would you have to grow to get  
3                   the amounts required, get up to the tonnage,  
4                   or whatever that you're going to need, and I  
5                   can't completely answer that one right now.  
6                   But I think as we get at the lab scale, once  
7                   we get an idea how much methionine is  
8                   produced, and how to ramp that up a little  
9                   bit, I think we'll have a pretty good idea of  
10                  what it's going to take to scale that up. And  
11                  as a microbiologist, what I would say is a lot  
12                  depends on how much oxygen is required in the  
13                  ferment -- you know, if it's fermentation  
14                  system versus a more aerobic-type system, you  
15                  know. Laboratory is easy to optimize. When  
16                  you start getting large-scale, that has its  
17                  own challenges, to some extent. But I've  
18                  worked with a chemical engineers a lot over  
19                  the years, and I feel pretty good about we'll  
20                  be able to line up with somebody that can help  
21                  us on that part. And we've made some  
22                  overtures along those lines already, so does

1 that answer your -

2 MR. MOYER: Yes, it gives me a  
3 better idea. We're talking a few years before  
4 we actually get the plans laid out, and then  
5 another --

6 DR. RICKE: Yes. Exactly. I  
7 mean, there's, obviously, some commercial  
8 considerations and that sort of thing. I  
9 mean, keep in mind, and I know this has come  
10 up a little bit in some discussion points  
11 already, is that we're probably not dealing  
12 with what I would call intellectual  
13 properties, and patents, and that sort of  
14 thing, because these are natural isolates. I  
15 mean, we've not done any genetic modification  
16 or anything like that, nor would we. So,  
17 that's one of the upsides of this, is that  
18 really it's already an organism, it's already  
19 in nature.

20 MR. MOYER: Thank you.

21 CHAIRPERSON GIACOMINI: Joe.

22 MR. SMILLIE: Have any commercial

1 fermenters approached you, or do you have any  
2 knowledge if anybody is interested in this?

3 DR. RICKE: I've not been  
4 approached, but then I haven't been real  
5 aggressive about approaching folks either. I  
6 tend to be conservative that way. I like to  
7 make sure I've got my ducks in order before I  
8 start -- we have enough hype in this business.  
9 I try to -- but, absolutely, once I get a  
10 better idea lab-wise, my idea would be to -- I  
11 have colleagues in academics that certainly  
12 could help us along those lines. And, again,  
13 I think Walter brought this point up very  
14 well, is it's like a lot of things, I have  
15 applied to the OREI in the past for grants and  
16 that sort of thing, and all this stuff, the  
17 Methionine Task Force has been fantastic in  
18 terms of seeding this, and getting us to this  
19 point. We really do need to put some  
20 investment in this.

21 I'm going to get on my soapbox  
22 here a little bit, because I think it needs to

1 be said from the academic side, if people  
2 really care about this stuff, and really want  
3 this to happen, they need to make the case  
4 that put the funds into it, and it'll happen.  
5 You know, that's the bottom line here. So, I  
6 -- we certainly have -- I don't even want to  
7 go into how many grants I've written this  
8 year. And I certainly don't want to go into  
9 the success percentage on that either, but I  
10 think we're seeing some seed changes in USDA  
11 in terms of their mentality about stuff. I  
12 mean, the new regime that is in place now, the  
13 new Program Director, is very much more into  
14 stakeholder input, and folks coming in and  
15 helping to write those RFPs for the grants,  
16 and identifying what the issues are. And I  
17 think this audience, and I think everyone  
18 needs to be cognizant of that, and help to  
19 encourage that. As I said, I'll step back off  
20 my soapbox, but I think there's some potential  
21 here, but it's an investment potential, too,  
22 it's the way we need to look at it.



1                   CHAIRPERSON GIACOMINI: Thank you.

2                   Just very quickly from the time that I've  
3                   spent in microbiology lab, very simple  
4                   question, are the bugs that you're optimistic  
5                   about, are they easy to grow or hard to grow?

6                   DR. RICKE: Yes, one of them in  
7                   particular is a really easy to grow organism,  
8                   so it's a fairly ubiquitous organism, and has  
9                   lots of variants out there, so it wasn't a  
10                  surprise that we might find one that would be  
11                  a variant that could do this. And I think one  
12                  of the long range things that we thought about  
13                  here is that we wouldn't, necessarily, need to  
14                  stop at methionine. We certainly could start  
15                  to look at lysine, we certainly could look at  
16                  some of the other essential amino acids. I  
17                  mean, there's -- I work a lot with the  
18                  conventional poultry industry, as well, and  
19                  there is a definite need on that side of the  
20                  equation, as well, with the ethanol driving  
21                  grain prices, et cetera, to come up with ways  
22                  to supplement lower quality proteins. And

1 that's one of the reasons why crystal amino  
2 acids retained some popularity along those  
3 lines. So, I think there's opportunities here  
4 to do some nice precise balancing of diets  
5 with some of these approaches. So, I think  
6 that's where we want to go with some of what  
7 we're doing.

8 CHAIRPERSON GIACOMINI: Thank you.  
9 Dave Martinelli with a proxy, Greg Herbruck,  
10 and Kurt from Nature Pure in the hole.

11 MR. MARTINELLI: Good morning.  
12 Dave Martinelli, I'm with Coleman Natural  
13 Foods. We're an organic broiler producer, but  
14 I'm actually representing the Methionine Task  
15 Force this morning. I'll try to be brief. I  
16 have the proxy, but I don't think I'll need  
17 the full 10 minutes. We'll just kind of go  
18 through this quickly.

19 Just kind of outline, next slide,  
20 Valerie, this is what we're going to be  
21 talking about. I want to spend a little bit  
22 of time on the recommendation coming out of

1 the Livestock Committee, and also reference  
2 some minor adjustments that the Task Force  
3 would like to see in the final recommendation.  
4 We'll touch briefly on the research. You've  
5 gotten a pretty good update from both Walter  
6 and Steve already, but I'll just mention a few  
7 other points to both of those. And then,  
8 lastly, we'll discuss some of the more recent  
9 feeding trial information that we've  
10 uncovered.

11 First, an acknowledgment. I do  
12 very much appreciate the fact that in our many  
13 years of rehashing this topic there seems to  
14 at least be an acknowledgment that methionine  
15 is a critical and essential amino acid in  
16 poultry. We wrote a very detailed petition  
17 this time in the justification section talking  
18 about the fact that with the vegetarian diet  
19 for an omnivore, for an animal that needs meat  
20 in its diet given the constraint of the  
21 vegetarian diet, it's basically critical that  
22 they get some level of methionine for

1 acceptable development of the immune system,  
2 particularly in young birds, baby chicks that  
3 need that good start on life so they can ward  
4 off other environmental pressures that may be  
5 coming their way. So, I think that's just a  
6 thank you very much for at least -- we can  
7 argue about how much, but at least  
8 acknowledgment that it is a critical and  
9 important amino acid.

10 We have two suggestions, and these  
11 are both covered in our written comments, as  
12 well, but just to address the Board, and  
13 entertain questions around them. We feel that  
14 pullets, because, again, we're dealing with  
15 baby chicks and birds up to 27 weeks of age,  
16 that those should really be carved out as a  
17 separate category from laying hens. They have  
18 different methionine needs. And our  
19 suggestion is to group them together with  
20 broilers, which also encompass birds from day  
21 old chicks, all the way to market age. And  
22 our suggestion would be that as we hit the

1 step-down levels, kind of the second point of  
2 this, effective 2012, our recommendation would  
3 be that both broilers and pullets get three  
4 pounds per ton, as opposed to the two pounds  
5 per ton that were recommended. The layers go  
6 from four pounds to two pounds in the step-  
7 down, broilers actually, currently, are  
8 recommended to go from five pounds to two  
9 pounds, so there's kind of a disproportionate  
10 drop in broilers, and also if this  
11 recommendation were accepted, in pullets, as  
12 well. There's not only a disproportionate  
13 decrease in the allowance, but it's happening  
14 in a category of birds that probably has the  
15 single highest level of methionine demand,  
16 because of their age, and their stage of life,  
17 and growth. Next slide, please.

18 It's also important to underscore  
19 that the majority of methionine for the birds  
20 will still be coming from grain sources in  
21 their diet. Technically, the diet will be  
22 deficient of methionine, but of the methionine

1 that is present in the diet on the step-down  
2 levels, 82 percent of the diet at a minimum,  
3 it varies by class of birds, but this is the  
4 lowest percentage, 82 percent of the  
5 methionine in the diet will be met from grain  
6 sources, so we're still talking about the  
7 majority of the birds' methionine needs being  
8 met by grains, and only a very small  
9 supplemental percentage being provided by the  
10 synthetic.

11           There's some different  
12 perspectives on whether even the three pounds  
13 is adequate for broilers and pullets. We were  
14 able to find at least one major breeder  
15 producer, High Line, that recommends for baby  
16 chicks, I think it's 2.88 pounds of methionine  
17 per ton, so that's kind of how the -- why the  
18 Task Force settled on three pounds, but you  
19 will probably hear comments today that even  
20 three pounds isn't sufficient. Again, we can  
21 argue over the level, but we're trying to live  
22 with the absolute bare minimum that we need

1 for maintenance of basic health requirements  
2 for the bird.

3 Just to segue a little bit into  
4 some of the research alternatives. Again,  
5 you've heard from Walter in detail about some  
6 of the seed trials. I'm going to speak,  
7 specifically, to some trials that we did with  
8 Walter's seed with Sun Opta. We did two plots  
9 in Iowa, specifically raising the corn for  
10 feeding trials. We had a 35-acre site that  
11 came in with a disappointing yield, about 66  
12 percent of the control groups. And then we  
13 had a second 40-acre site that was really kind  
14 of off the chart, disappointing at 23 percent  
15 of the control groups. So, this has been a  
16 bit of a setback, frankly, because we had  
17 hoped that we would get something more  
18 consistent with some of the test plot work  
19 that shows more the 87 or 90 percent  
20 comparison to control, so about a 10-13  
21 percent yield drag. And seeing yield drags  
22 like this creates a significant problem, just

1 in terms of making the project even a go.

2 So, the second leg of this, we've  
3 had the disappointing agronomic results, but  
4 the second, from our perspective, more  
5 important element of this is then to take that  
6 feed corn that we do have, and start running  
7 feeding trials. In two weeks, we're going to  
8 start feeding trials of broilers in  
9 California. The work that's been done so far  
10 has been on extremely small bird counts, I  
11 mean like 50 birds, so we've got some test  
12 housing in California that we've used  
13 previously, that'll probably run, I think the  
14 high methionine corn trial will be somewhere  
15 between 400-800 birds, so at least we get  
16 something closer to approximating a commercial  
17 setting.

18 This is just kind of a graphical  
19 picture. I don't know if it really shows in  
20 this light, but here on the left is organic  
21 corn from the control group, and here on the  
22 right is the high methionine corn. Not only



1 is the ear size smaller, but the kernels  
2 themselves are smaller, as well.

3 We heard from Steve on the first  
4 bullet point here about naturally produced  
5 methionine, so I don't think I -- he certainly  
6 knows a lot more about it than I do, and I  
7 think he covered it very well, so I'm not  
8 going to spend any time there.

9 You did hear a presentation, I  
10 want to say about a year ago, from a group  
11 that was working on alfalfa nutrient  
12 concentrate, again, an area of disappointment.  
13 We haven't really been able to engage the  
14 vendor. We sent emails, asked for spec  
15 sheets, asked to get a time line of when this  
16 product produced organically, and where  
17 they're at in the process, and there's just  
18 really been no follow-up, no response. So,  
19 we've poked, we've prodded, we've tried to get  
20 it moving along, and there's just been no  
21 reaction. So, I'm kind of putting that in the  
22 category of not viable at this point.

1 Obviously, if it revives, we'll pursue it, but  
2 at this point, I think we probably need to  
3 move on and focus on the high methionine corn  
4 and naturally produced methionine.

5 In terms of feeding trial results,  
6 Herbruck's ran a layer trial, and I think the  
7 two most significant take-aways on this, in  
8 the no methionine group, there was significant  
9 feather loss, particularly at the end of the  
10 test cycle. And, again, this is a no  
11 methionine group, not the step-down level that  
12 we're talking about. But I've got a slide  
13 following this from the 2008 study in Sweden,  
14 and there's a very consistent trend here in  
15 terms of feather loss in birds that don't have  
16 adequate levels of methionine.

17 Interestingly enough, they also  
18 have a reduced foot pad size in the no  
19 methionine group in the layer trial, and this  
20 is really Michigan State's speculation, but  
21 the hens could not maintain covered body  
22 temperature, and they were trying to --

1       because the feathering wasn't in place  
2       adequately, but they were trying to use stored  
3       body fats to clean the foot pad, to try to  
4       compensate. So, it's just another example  
5       that when you go to a strictly no methionine  
6       diet, you have some significant health  
7       problems within the birds.

8                        Again, with the broiler trials  
9       that we're going to start in two weeks, we'll  
10      include high methionine corn, and we're also  
11      going to run trials on fish meal, just to see  
12      (a) if it works from a performance standpoint,  
13      if the birds look okay and feather properly,  
14      but, also (b) if there's other -- we'll then  
15      do a sensory analysis of the meat to see if  
16      there's any flavor issue that's come up before  
17      as a possible issue in terms of inclusion  
18      rates of fish meal in the diet.

19                      And the last slide I have here is  
20      about the results of the trial in Sweden. You  
21      may have seen this before at the last Board  
22      meeting, but I thought I'd include it again,

1 since it's a fairly recent trial. The  
2 important thing is feathering was very poor.  
3 In this particular trial, it was manifested in  
4 much higher levels of feed intake. And I've  
5 got appendices at the end of this report that  
6 has detail on that trial, as well as the  
7 detail on the methionine percentage of the  
8 diet that's met from grains versus the  
9 synthetic, as well. So, I won't bore you all  
10 with that, but that's included as part of the  
11 presentation that you can view later. So,  
12 that concludes what I have to say.

13 CHAIRPERSON GIACOMINI: Okay. Any  
14 questions? Steve.

15 MR. DeMURI: Thanks for your  
16 presentation. Weren't you guys working on an  
17 insect option, as well?

18 MR. MARTINELLI: Yes, there was  
19 like an insect meal product that was really  
20 coming out of the aquaculture industry, and  
21 that really has tended the same track record  
22 as this alfalfa nutrient concentrate where it

1 was supposed to be this product that would  
2 solve our problems, and we finally did get a  
3 spec sheet, I think, a year and a half ago out  
4 of that group. It's basically got the same  
5 nutritional profile, including methionine as  
6 soybean meal which we currently feed, and to  
7 my knowledge, they really abandoned that  
8 project. I've not gotten any further follow-  
9 up with them about where they're at in the  
10 process.

11 CHAIRPERSON GIACOMINI: Dave,  
12 aside from the comments that we have online  
13 that we're reading, the ones who just said we  
14 were totally crazy one way or the other. Of  
15 the people who analyzed our step-down, I think  
16 the pullets were fairly universal, and  
17 suggesting that we move them. You're also  
18 suggesting the broilers. Can you give just a  
19 little bit of additional justification for us  
20 to be able to make that move?

21 MR. MARTINELLI: Yes, I guess  
22 there's two reasons, primarily. One is the age

1 of the bird. With broilers, you're dealing  
2 with baby chicks, as you are pullets, and they  
3 have a disproportionately high methionine  
4 demand at that stage of life. So, somehow we  
5 need to address that. And that's -- actually,  
6 when we wrote our petition it was around an  
7 average, because there is a disproportionately  
8 high need at the beginning that's offset by a  
9 lower need with older birds.

10 I think the critical thing is that  
11 we get adequate methionine to the birds at the  
12 stage of life that they need it. And in the  
13 case of broilers, they were going down from  
14 five pounds to two pounds, there's actually a  
15 60 percent reduction, TAP provided for a 60  
16 percent reduction, which didn't seem  
17 consistent with what we were doing with the  
18 other categories.

19 CHAIRPERSON GIACOMINI: Could you  
20 give us a number that we could possibly  
21 utilize as a maximum at saying all chicks, and  
22 putting a maximum age?

1 MR. MARTINELLI: You mean carving  
2 out broilers separate from pullets then? So,  
3 you'd actually have --

4 CHAIRPERSON GIACOMINI: Just  
5 carving out all chicks.

6 MR. MARTINELLI: Well, we're  
7 saying up to 27 weeks, so 27 weeks --

8 CHAIRPERSON GIACOMINI: Twenty-  
9 seven weeks.

10 MR. MARTINELLI: -- would solve  
11 the problem, because you're going to cover  
12 broilers with that.

13 CHAIRPERSON GIACOMINI: And how  
14 far do broilers go after 27 weeks?

15 MR. MARTINELLI: Well, broilers  
16 don't go to 27 weeks.

17 CHAIRPERSON GIACOMINI: But the  
18 pullets need 27 weeks.

19 MR. MARTINELLI: Right. And that  
20 would be our recommendation, actually, to have  
21 a specific number, as opposed to pullets.

22 CHAIRPERSON GIACOMINI: Thank you.

1 Greg Herbruck, Kurt Lausecker on deck, and  
2 Steve Mahrt in the hole.

3 MR. HERBRUCK: Good morning. My  
4 name is Greg Herbruck. I'm an organic egg  
5 producer in Michigan, and my brothers and I,  
6 we've been producing organic eggs since 1998.  
7 And we were a part of the large growth that's  
8 been going on in the organics. We believed in  
9 the USDA organic program, that this was -- to  
10 develop new markets. And this was a new  
11 market for our company, and we have invested  
12 millions of dollars in that growth. We have -  
13 - and I'm in the chicken house just about  
14 every day. And the Cornucopia study is right,  
15 this proposed guidelines for living conditions  
16 and stocking standards, and outside access  
17 will put us out of business. We did not build  
18 these currently certified organic houses with  
19 some of these standards in mind. And if they  
20 are imposed upon us, then we will not be able  
21 to produce.

22 The standard, and the assumption



1 that then 80 percent of the guys that are like  
2 us that have a house similar that cannot  
3 either economically depopulate enough but  
4 still pay the bills, that there's a cage-free  
5 market for our eggs if we are not organic.  
6 That market will quickly become a commodity  
7 market because there's too many of us out  
8 there already who have also -- that will  
9 follow me later in the day that have invested  
10 likewise millions of dollars. So, I challenge  
11 the NOSB to think about that as they look at  
12 setting a standard, that we are currently  
13 certified organic, and have been for many  
14 years. And these new standards could well put  
15 us out of business.

16 As we look at some of these  
17 stocking standards, I know for some of the  
18 sources were mentioned, I think the idea of  
19 considering further is merit. There are  
20 several sources that I work with through some  
21 of my farm industry standard boards,  
22 university ethicists and bird behaviorists

1 that have not been contacted yet, and I would  
2 strongly encourage that we do so as we  
3 proceed.

4 There's also existing standards  
5 that were developed on a science base, and an  
6 ethics base. American Humane Association has  
7 one such, Humane Farm Animal Care has one,  
8 that have all gone through a similar process  
9 that we're seeking to do, and in the absence  
10 of any guidance or direction from the NOP,  
11 most of us have all accepted those and are  
12 being certified and audited by those groups.  
13 So, I would encourage that we look to what has  
14 been accomplished there.

15 And one thing that is not in the  
16 initial standard, and what needs more research  
17 is the type of housing. There are multitudes  
18 of housing systems out there that affect how  
19 a hen's life goes on. There are flat floor  
20 barn systems, there's raised perch systems,  
21 roost systems, and then there's what's called  
22 aviaries, where it's multi-tier, where they

1 actually are free flying to move about in the  
2 system. None of those are considered in this,  
3 and should be, and there are standards with  
4 these other two groups I mentioned.

5 The third point I'd like to  
6 mention is the outside access rule. As an egg  
7 producer, we're also going to be required to  
8 comply with a new FDA rule July of this year,  
9 whereby we're required to clean and disinfect  
10 all living surfaces. If we have to increase  
11 and have more outside access, and more pasture  
12 area, the FDA will require us to disinfect  
13 those surfaces, and I don't know how we will  
14 do that.

15 The other thing is that rodents  
16 are a major vector of salmonella, and in the  
17 higher -- where we are, they're off concrete  
18 or a hard surface, they're more likely to have  
19 contact with rodents that very likely are one  
20 of the major sources of salmonella in eggs  
21 today, and will increase the risk of that in  
22 the finished product, and reduce food safety.

1 So, I think we should consider all those as  
2 you moved ahead. And, like I said, the goals  
3 of the USDA are to promote and build markets,  
4 and some of these guidelines will reduce  
5 markets. Thank you.

6 CHAIRPERSON GIACOMINI: Jeff.

7 MR. MOYER: Thank you Greg. Am I  
8 to understand that your birds don't go  
9 outdoors at all right now?

10 MR. HERBRUCK: Oh, no. Yes, they  
11 go outside, yes. But 20 percent of the living  
12 space is outside access.

13 MR. MOYER: Is that on porches?

14 MR. HERBRUCK: Porches, just  
15 fenced in areas all types. I guess they all -  
16 - that's the requirement, they have to -- they  
17 have access 365 days a year.

18 MR. MOYER: And are you currently  
19 disinfecting those areas?

20 MR. HERBRUCK: Yes. And most of  
21 them are covered in concrete. There's a few  
22 of our smaller farms that actually they're

1 going out of business. We had one contract  
2 producer that worked with us, couldn't comply  
3 with some of these new guidelines. Instead of  
4 adding the extra surfaces, chose to go out, so  
5 we had roughly 190,000 capacity just  
6 depopulate in the last month.

7 MR. MOYER: So, unlike the person  
8 we heard before who was trying to get his  
9 birds on grass, so that's 75 percent  
10 vegetative, your's is on concrete when they're  
11 outdoors. I'm just trying to get a picture of  
12 it.

13 MR. HERBRUCK: Most of them, yes.  
14 They're called winter gardens, porches, all  
15 types of things. Some of them we even have  
16 roosting areas where they can go out and get  
17 up higher staying away from some of the --  
18 depending on the size, and it was mentioned  
19 that the main pathway areas, the difficulty  
20 with laying hens is keeping grass in there  
21 because they love to tear it up, and it's  
22 gone. I mean, when I looked at some of the

1 initial proposals, I don't know how we'd keep  
2 them because chickens just love to scratch.  
3 And you'll be to bare dirt very quick. And  
4 they love to burrow. They'll be down under,  
5 and rodents also like those burrows, as well,  
6 so we're going to increase the contact with  
7 high-risk opportunities, and rodents are one  
8 of the main carriers of salmonella. That is  
9 one of the risks to the food safety.

10 MR. MOYER: And how many square  
11 feet per bird of outdoor access do you  
12 currently -

13 MR. HERBRUCK: Well, it's anywhere  
14 around 20-25 percent of the -- depending on  
15 the system. We have all three types of -- or  
16 three types of systems, barn systems in the  
17 American Humane and Humane Farm Animal Care  
18 are 1.5 square feet. The raised roost system  
19 is 1.2, the aviary is one square foot. And  
20 this is all designed around how well these  
21 birds interact in the system, are they  
22 protected, do they have safe places? I mean,

1 pecking order came from birds, and the better  
2 designed system best protects the lower  
3 hierarchy birds, and gives areas for the  
4 dominant birds to stay away from them. So, on  
5 a flat floor system, I've seen it myself when  
6 some group decided to pick on one bird, that  
7 bird can be dead in a few moments.

8 MR. MOYER: Thank you.

9 CHAIRPERSON GIACOMINI: Joe.

10 MR. SMILLIE: Greg, your current -  
11 I realize you're dealing with complex systems,  
12 and there's no one single answer, but,  
13 currently, do all of your systems meet current  
14 USDA regulations?

15 MR. HERBRUCK: Yes.

16 MR. SMILLIE: We know that, and do  
17 they all meet the HSUS Humane Welfare  
18 Standards, or just -- the Humane Society.

19 MR. HERBRUCK: Humane Farm Animal  
20 Care, and American Humane Association?

21 MR. SMILLIE: Right.

22 MR. HERBRUCK: Yes.

1 MR. SMILLIE: They all meet.

2 MR. HERBRUCK: They all meet it.

3 MR. SMILLIE: Okay.

4 MR. HERBRUCK: And we had to make  
5 a lot of changes. There was specific  
6 requirements for nest space, for perch space,  
7 for dust bathing, for all the various  
8 behavioral things that a bird needs to go  
9 through in a day, feed and water also. So,  
10 those all should be considered as you move  
11 forward.

12 MR. SMILLIE: We had a speaker  
13 this morning that supported our current  
14 recommendation on -- wasn't that a Humane  
15 Society speaker? I think it was that, but  
16 we'll follow-up and find out what the  
17 discrepancy seems to be there.

18 CHAIRPERSON GIACOMINI: HSUS and  
19 HSA.

20 MR. SMILLIE: Oh, okay. They're  
21 different groups. Okay.

22 The last thing is, has there been



1 any networking with your Canadian colleagues  
2 that are currently facing this implementation  
3 of their regulation? They've got a soft  
4 enforcement for two years, and have you  
5 dialogued with them on the current Canadian  
6 regulations which are slowly being enforced?

7 MR. HERBRUCK: Minimally. The main  
8 difference between Canada and the US, Canada  
9 has a quota system, so they have -- they will  
10 not -- I mean, they have a market order, and  
11 any excess production winds up in the US. They  
12 are almost guaranteed a profit. In the US, we  
13 have no such quota system that we can work  
14 with, and we can rely on to support and  
15 develop a standard. They set -- the Quota  
16 System Board sets the price of the eggs, so in  
17 the US it's market price. If you have extra  
18 eggs, you sell them until they're gone, or I  
19 mean you drop your price until they're gone.  
20 And in Canada, they don't have to deal with  
21 that risk.

22 CHAIRPERSON GIACOMINI: In Canada,

1 that's a provincial quota system. Correct?

2 MR. HERBRUCK: Yes.

3 MR. SMILLIE: I think we have to  
4 take a lot of things into consideration. The  
5 fact that you're currently meeting standards,  
6 and it looks as if we are creating an unstable  
7 regulatory environment for the entire  
8 industry, I think we need to look at that very  
9 carefully.

10 MR. HERBRUCK: We speculated that  
11 80 percent of the current housing will not  
12 meet it. And I think that the Cornucopia  
13 study supported that, that my brothers all  
14 said we'll be out of business because we can't  
15 work the bank, we can't pay back the bank.  
16 We'll have to come up with tens, if not  
17 hundreds of thousands of more growers to meet  
18 it with the smaller sized populations that are  
19 out there.

20 CHAIRPERSON GIACOMINI: Okay.

21 Thank you.

22 MR. HERBRUCK: Thank you.

1 CHAIRPERSON GIACOMINI: Thank you.

2 One quick minute as the next speaker comes up,

3 Kurt Lausecker, Steve Mahrt, and George Bass.

4 As Joe tends to remind, it's good to be Chair.

5 One of the things you can do is take a

6 personal minute. As we've heard before, it is

7 good to have a meeting outside of the D.C.

8 area on the west coast. For me, I'm an hour

9 and a half from home, so my wife is able to

10 come, and the best secretary, and the best

11 editor in the world. So, I -

12 (Laughter.)

13 CHAIRPERSON GIACOMINI: Thank you.

14 MR. LAUSECKER: Thank you for

15 allowing me to comment on the proposed

16 National Organic Standard Board's Animal

17 Welfare recommendations for organic laying

18 hens. My name is Kurt Lausecker, and together

19 with my wife, Gertie, who is also here today,

20 I'm the owner of Nature Pure, an organic egg

21 farm in Raymond, Ohio.

22 I worked for 30 years as manager

1 of Daily Egg Farm, a layer operation with two  
2 million laying hens in cages, and about  
3 200,000 cage-free organic laying hens. Three  
4 years ago, I was able to buy the organic part  
5 of Daily Egg Farm, including an organic feed  
6 mill. The investment at the time was several  
7 million dollars. I have a strong commitment  
8 to animal welfare, and served on the Animal  
9 Welfare Committee of United Egg Producers.

10 My dream came true when I invested  
11 in organic food production. This is my life  
12 now, and the life of my family. My farm  
13 consists of six laying buildings for 32,000  
14 layers each, and one processing room with an  
15 egg crater and a cooler. I also have one  
16 organic pullet house, and I employ  
17 approximately 35 people, and buy organic grain  
18 from more than 13 local organic farmers.

19 All buildings have state-of-the-  
20 art equipment for cage-free organic egg  
21 production, and were furnished according to  
22 current organic and cage-free rules and

1 regulations, as outlined by the AHC, and the  
2 National Organic Program.

3 Just two weeks ago, my company  
4 passed an American Humane Certified Audit with  
5 99 out of 100 points. While I agree with the  
6 concerns submitted by the US commercial size  
7 organic farms, there is one issue that is of  
8 critical importance to me. I'm here just to  
9 let you know that the proposed outside space  
10 of 1.8 square foot per bird will -- what they  
11 will do to my company. I cannot comply. I  
12 just do not have additional outside space  
13 available.

14 When the original transition from  
15 caged laying hens to cage-free organic laying  
16 hens was made, the existing buildings were  
17 utilized. While I am in compliance with the  
18 current requirements for outside access, I am  
19 very restricted on outside space. The  
20 proposed recommendations would reduce the  
21 number of hens in my houses from 32,000 to  
22 less than 5,000.

1                   My young company is highly  
2 leveraged, and our financing is spread out  
3 over the useful life of the buildings and the  
4 equipment. If the recommendations will be  
5 implemented as proposed without  
6 grandfathering, they would force my company  
7 out of business, since I cannot repay my  
8 loans. Thirty-five employees would lose their  
9 job, and many local organic farmers would have  
10 to look for another market. Because egg  
11 production is my only source of income, I  
12 would lose everything I worked for in 35  
13 years. Thank you.

14                   CHAIRPERSON GIACOMINI: Questions?  
15 Jeff.

16                   MR. MOYER: Your birds go outside  
17 right now, or have some access to outdoors.  
18 Is that correct?

19                   MR. LAUSECKER: Yes.

20                   MR. MOYER: And how many square  
21 feet do they have right now?

22                   MR. LAUSECKER: Outside access?

1 MR. MOYER: Yes.

2 MR. LAUSECKER: About 35 percent  
3 of the living space that they have inside.

4 MR. MOYER: Okay. And what is the  
5 outdoor access, it is concrete porches?

6 MR. LAUSECKER: No, that's just  
7 fenced in and covered -

8 MR. MOYER: Fenced in, covered.

9 MR. LAUSECKER: -- grass area,  
10 pasture.

11 MR. MOYER: Okay.

12 MR. LAUSECKER: It's interesting  
13 to note, however, that how few birds really  
14 take advantage of the outside areas. This is  
15 something that is really surprising to me, and  
16 this is just an observation I made in my own  
17 company. I would expect really that there are  
18 far more birds outside than there actually  
19 are. Personally, I believe the reason is that  
20 birds generally are really worried about  
21 predators flying over them, and they really  
22 shy to the outside. I just want to mention

1 this because I think this gets somehow  
2 overlooked, that in reality birds are really  
3 not taking advantage of the outside areas that  
4 we even propose right now, have right now.

5 MR. MOYER: Thank you.

6 CHAIRPERSON GIACOMINI: Wendy.

7 MS. FULWIDER: What do you have  
8 for access doors?

9 MR. LAUSECKER: There are openings  
10 about five feet to six feet wide, and maybe  
11 two feet high, numerous. I mean, ten on each  
12 side of the building, ten, fifteen.

13 MS. FULWIDER: Thank you.

14 MR. LAUSECKER: Thank you very  
15 much.

16 CHAIRPERSON GIACOMINI: Thank you.  
17 Okay. Steve Mahrt up, Greg Bass on deck,  
18 Robert Beauregard in the hole.

19 MR. MAHRT: Well, good morning.  
20 It seems like 100 years ago I was here in the  
21 '90s testifying about organic egg production,  
22 and here I am again. And some of the same



1 issues are still here.

2 One of my concerns is being echoed  
3 here, is that I took an old cage layer house  
4 ranch, and I initially converted to cage-free.  
5 And in '95 we were one of the first certified  
6 egg producers in California. And, at that  
7 time, it was an experiment, not knowing how it  
8 was going to work out. And those of us lucky  
9 to live in California with all the wonderful  
10 water quality control issues that we have, air  
11 quality control issues, and every other issue  
12 you can think of, and some we haven't invented  
13 yet, but we will, we worry about not only the  
14 chickens, the environment, our customers, our  
15 competition, and the folks that work for us.  
16 And with this new onset of proposed  
17 regulations, I'll tell you, I can't move my  
18 chicken house. We don't have enough space.  
19 I can't afford enough land to fulfill these  
20 regulations. Our houses are open-sided. We  
21 naturally ventilate our chickens, we naturally  
22 light our chickens as much as possible. I

1 mean, it's kind of part of our whole  
2 sustainable creed that we use. We try not to  
3 use any outside inputs, as little as possible,  
4 and then we have roosting areas outside. We  
5 are faced -- we have areas right next to our  
6 farm where we have large populations of  
7 migratory birds, and for those of you that  
8 haven't kind of kept up with it, because  
9 you're not chicken farmers, avian influenza is  
10 a big scary deal. And we're very concerned  
11 about contaminating our chickens because -- I  
12 don't know if you guys realize what happens  
13 when a chicken gets avian influenza. It dies,  
14 and it's very rapid.

15 The other thing that we're  
16 concerned about, and the CDC is concerned  
17 about is that the birds that give our chickens  
18 potentially avian influenza, that some of that  
19 mutates and gets passed on to our customers.  
20 And that's the absolute last thing we want.

21 Another issue that makes it even  
22 more fun is federally now the FDA has decided

1 that eggs are the cause of all things. We got  
2 passed cholesterol, and now we're being blamed  
3 for virtually all the salmonella issues in the  
4 United States, even though the data they used  
5 was from the early '90s. We vaccinate all our  
6 chickens, we've tested our eggs, but that  
7 doesn't matter to the FDA at this point, and  
8 the problem is that we've got two regulatory  
9 bodies that we've got two regulatory bodies  
10 that are going heads on at each other. USDA,  
11 you guys say put them outside more, give them  
12 more space, and the FDA says well, you're  
13 going to have to swab all the environment, and  
14 if you run across one pellet from a mouse, you  
15 could be a positive sample, and then you've  
16 got to invert all your eggs to the breaking  
17 plant. And guess which breaking plant is  
18 going to want eggs that have possibly positive  
19 for salmonella. Gee, I don't think there's a  
20 lot of them signing up and saying I want to do  
21 this. Well, wait a minute, maybe I will, but  
22 I won't give you anything for the eggs,

1 because I'm taking such a risk. Okay?

2 So, my experience in the US  
3 talking to a few folks over the years is that  
4 if you're positive for salmonella, you  
5 depopulate the birds. Okay? So, you're  
6 recruiting an untenable situation for us by  
7 expanding the requirement for outdoor access  
8 because the threshold is 3,000 birds. That's  
9 not a very big organic farm.

10 One of the things that we'd all  
11 like to do is be diversified. Right? The  
12 problem is, a pretty large amount of expertise  
13 is required to raise chickens nowadays. I  
14 mean, we're talking about methionine. That's  
15 an essential amino acid. We're getting pretty  
16 sophisticated. Okay?

17 On my farm, I have a guy that  
18 raises potatoes. My brother has an organic  
19 dairy on our farm, but we all share our  
20 expertise, and share the farm. My part of the  
21 farm, there's roads, and I can't move my  
22 chicken houses any further.

1           The last point I want to make is  
2           that I'm in support of the Task Force because  
3           methionine, it even says in your last meeting,  
4           is amino acids are as important as vitamins  
5           and proper food sources. So, once again, I am  
6           concerned about what the FDA is going to do to  
7           us. I don't even know if any of us are going  
8           to pass, because we don't do environmental  
9           testing very regularly, but we do egg testing.  
10          So, anyway, questions.

11           CHAIRPERSON GIACOMINI: Questions?  
12          Jeff.

13           MR. MOYER: Thanks, Steve. I'm  
14          going to ask you sort of the same question I  
15          asked of the last producer.

16           MR. MAHRT: Sure.

17           MR. MOYER: Do your birds go  
18          outside at all?

19           MR. MAHRT: They go out some, but  
20          remember, our houses are way open, so they can  
21          sun themselves, so there isn't quite the need.  
22          But I'm not in -- I'm in West Sonoma County.

1 I'm not in the Midwest where there's snow, and  
2 it's cold. So, our birds, our wall is only  
3 this tall on nine foot high buildings, so they  
4 can sun themselves in the house, and naturally  
5 ventilate. And we don't use any outside  
6 lights except in the morning and evening.

7 MR. MOYER: Okay. So, if we were  
8 to pick a square foot number, what kind of  
9 square footage number would you -

10 MR. MAHRT: Well, I don't know  
11 what the -- I think that that should be left  
12 up to the certifier. I mean, I think that  
13 conforming with the rules -- this thing has  
14 been in existence for 10 years. I don't think  
15 it's broken. I think the issue you have is  
16 the consumer perception that there's kind of  
17 an industrialization of organic, and I think  
18 that's what you guys are wrestling with. And  
19 the problem is that anything in production  
20 agriculture is a little bit of a compromise.  
21 Okay? We have human welfare, we have animal  
22 welfare, and then we've also got farmer

1 welfare. Right? Because one of the key  
2 linchpins of sustainable is we've got to make  
3 a profit, because nobody is going to loan us  
4 any money to do this stuff, if we can't make  
5 you profitable. Right? So, it's -- the  
6 certifier I think is the manner -- for you to  
7 try to make a -- that's why it was so hard  
8 before when I was testifying years ago, that's  
9 why they left it pretty open and up to the  
10 certifier, because it isn't one size fits all.  
11 You know, I mean, I have -- we do some  
12 business with a major organic cooperative.  
13 Okay? Well, I've seen their places in the  
14 middle of winter. Okay? Birds don't go  
15 outside. They can't. The snow is over the  
16 top of the damned doors, so what are they  
17 going to do? So, you've got to really think  
18 about the environment in the house. You've  
19 got to provide for those birds.

20 The other thing, I've been in  
21 Europe a number of times looking at organic  
22 communities. Okay? They keep wanting to push

1 the birds further out, and the birds keep  
2 saying no. Okay? No matter how much the  
3 consumer wants kind of the bonanza chicken,  
4 okay, the chicken has a say in it, and they  
5 don't go very far. I should have brought it.  
6 I have a picture, an overhead picture of a  
7 pretty sophisticated organic layer operation  
8 in England, and there's dirt paths around  
9 every single building. Now, the guys that  
10 move their birds, this pasture-based system,  
11 that's cool if you're in Virginia where you  
12 get rain a number days a year, but I'll tell  
13 you, this is an unusual year for us. Most of  
14 our stuff is going to -- normally, in another  
15 month or so, they call it the Golden State.  
16 That's not because it's gold, it's because  
17 everything is dry, and there is no more  
18 pasture or forage out there. Okay? So, they  
19 get zip. Okay? What they do get is angst as  
20 we're full of red-tail hawks in our area, and  
21 every time one of those suckers flies over,  
22 even if the birds are inside, they see them,



1       they go on the other side of the chicken  
2       house, because guess what, to them that's  
3       still scary. Even though we say it's not  
4       scary, they still think it is.

5                   MR. MOYER: I have one follow-up  
6       question to that.

7                   MR. MAHRT: Sure.

8                   MR. MOYER: When you described  
9       your laying house, to me it sounds very sunny,  
10      airy, and comfortable. If a consumer of your  
11      eggs came to visit your farm, would they be  
12      happy with what they see, in your opinion?

13                   MR. MAHRT: It depends where  
14      they're sitting. It really depends on where  
15      they're sitting. I mean, I've brought people  
16      and there's chickens all over the place and  
17      they go gosh, they're crowded. Then I show  
18      them a picture at night, and they're all  
19      sitting up in the roost, and you can run  
20      through the place. Okay? So, it really  
21      depends where they're sitting. I've had  
22      people that thought we were wonderful. And

1 I've had people that said well, you should  
2 only have five chickens in there. I mean,  
3 that's such a broad statement that it's really  
4 tough for me to answer. I think most of our  
5 customers like what we do, but I'm sure  
6 there's always somebody, and my wife answers  
7 all the emails, there's always a few that say,  
8 you know, I'm a devil. And there's a lot of  
9 them that say we're good, but there's always  
10 a couple that say we're the devil.

11 MR. MOYER: Well, how many square  
12 feet do you have inside your building per  
13 bird?

14 MR. MAHRT: It's about 175.

15 MR. MOYER: One seventy-five --

16 MR. MAHRT: But we have different  
17 tiers, you know, so the birds can move into  
18 different directions, because there's a  
19 definite pecking order. You've heard that  
20 today. All right? So, we want to make  
21 different areas for different birds in the  
22 pecking order, to be able to have

1 relationships.

2 MR. MOYER: Thank you.

3 CHAIRPERSON GIACOMINI: Other  
4 questions? Thank you.

5 MR. MAHRT: Very well. Thank you.

6 By the way, I want to thank all you guys.

7 This is not a fun job. It wasn't a fun job 20  
8 years ago, and I can't imagine it getting any  
9 better, so thank you guys all very much for  
10 your time.

11 CHAIRPERSON GIACOMINI: Where do  
12 people get this idea? It's a blast.

13 (Laughter.)

14 CHAIRPERSON GIACOMINI: Yes, at  
15 9:00 tonight when we're still going, it's a  
16 blast.

17 MR. MOYER: Dan, apparently we  
18 don't look like we're having fun.

19 CHAIRPERSON GIACOMINI: Well, we  
20 apologize then. George Bass, Robert  
21 Beauregard, Hal Kreher, however you say. Hal,  
22 you're in the hole.

1 MR. BASS: Thank you very much.

2 To the Committee and the staff, thank you all  
3 the time for the past and the present members  
4 of the NOSB Committee, and thank you to the  
5 staff which have worked very hard for the NOP  
6 for the public, and also the producers.

7 These are some of the important  
8 points of the Country Hen. Number one, even  
9 before the company was certified organic, the  
10 barns had hens on the floor, and had many,  
11 many windows back to back on both sides of the  
12 barns open to rain and the good weather.  
13 Every year each barn would be carefully  
14 cleaned by eight people. All manure was taken  
15 to other fields. All of this is going on  
16 today.

17 Number two, the porches of the  
18 farm are part of our certified organic system  
19 plan. I think we were the first certification.  
20 Number three, there should not be more hundred  
21 hens per acre to keep the grass. We have  
22 about 70,000 hens, therefore, we should have

1 700 acres. The cost of the land, building,  
2 and equipment would be exorbitant. Number  
3 four, we didn't want manure building up on the  
4 barn dirt so that non-potable water would get  
5 into the nearby large lake that supplies  
6 drinking water to Boston. This lake reservoir  
7 was closed to our farm. It's about 70 miles  
8 from Boston. Number five, the porches will  
9 stop the risk of migration of wild birds  
10 spreading external disease, AI. There are  
11 many internal diseases that can develop from  
12 hens in barren dirt.

13 As you know, cows are different  
14 from chickens. The disease was awful, at  
15 times you've seen it, over 250 million birds  
16 in China, they killed those hens, 250 million  
17 birds because the AI. And, also, in  
18 Pennsylvania, if you know about it, there are  
19 17 million birds died AI because they have AI.  
20 So, there is difficult -- I think they're very  
21 difficult. They're much more difficult as  
22 cows are not very good. I mean, the cows go

1 outside.

2 Our customers have completed two  
3 surveys about porches. In 2002, we sent about  
4 150,000 inserts in the cartons of the eggs to  
5 our customers. There were a total of 1,560  
6 answers. Eighty percent were positive, 20  
7 were negative. And we started another one.  
8 This came in this year, and the lady was doing  
9 it, she was fantastic. She did it during the  
10 night, and during the day, and she sent out  
11 900 letters to our customers, and also about  
12 1,000 emails. And these, which happened for  
13 these surveys, she got 405 replies to date,  
14 392 of the responses or 96.8. That's a vote  
15 of positives, and so that is fantastic. I  
16 really think that these people, our customers,  
17 understand that these porches are okay.  
18 There's no problem at all. Therefore, I'd  
19 just like to thank you.

20 CHAIRPERSON GIACOMINI: Jay.

21 MR. FELDMAN: Thank you for your  
22 comments. I have a question I wish I had

1 asked everybody that sort of testified on this  
2 issue, but if you were to distinguish for a  
3 consumer between organically certified  
4 production, egg production, and conventional,  
5 how would you describe the difference? How  
6 would you distinguish the two to the consuming  
7 public?

8 MR. BASS: Thinking about the  
9 customers, some like the organics, and other  
10 like the commercial?

11 MR. FELDMAN: Yes.

12 MR. BASS: Well, most people --  
13 anybody -- excuse me. I shouldn't say that,  
14 but we're the best of those eggs of anybody  
15 ourselves. We've done it for 22 years.  
16 Therefore, the quality I think is much, much  
17 better. Basically, and they understand what  
18 we do on the farm.

19 MR. FELDMAN: On the production  
20 side, what would be the key differences that  
21 you believe the consumer is concerned about?

22 MR. BASS: On the customers?

1 MR. FELDMAN: On the production,  
2 on your production side.

3 MR. BASS: Right now, it's on the  
4 computer, and, therefore, we've got those four  
5 photos that explains what happens. And we  
6 sent it. We gave a lot of information on that  
7 thing, the lady that set all that stuff. So,  
8 therefore, hopefully, the public could  
9 understand why it should be.

10 CHAIRPERSON GIACOMINI: Other  
11 questions? Okay. Seeing none, thank you.  
12 Robert Beauregard, Hal, I apologize for that  
13 last name, and Arnold Riebli.

14 MR. BEAUREGARD: Good morning. My  
15 name is Bob Beauregard, and I'm the General  
16 Manager of the Country Hen. And I have this  
17 thing all written up that I was going to read.  
18 I think that hearing from some of the past  
19 producers, it's just very repetitive.

20 The issues that we have with the  
21 outdoor access and the conflicting new  
22 guidance for FDA issues, environment will have



1 to be tested. So, obviously, this is about  
2 the outdoor access, and the animal welfare.  
3 So, I'm going to ask a question. If the  
4 chickens are out in the pasture, I would think  
5 that that would be environment. Environmental  
6 testing will be required between the ages of  
7 40 and 45 weeks of age.

8 If a positive result comes in from  
9 an environmental test, all of our eggs will be  
10 required to be tested. If the eggs come back  
11 as a positive, which they probably wouldn't,  
12 they would be diverted into a breaking plant,  
13 as one of the past producers. But you  
14 certainly would come up with positive results  
15 in a free range system testing that  
16 environment. Not only the rodents, you have  
17 the pigeons, you have the bats, and several  
18 others that carry salmonella naturally. So,  
19 it's a conflicting side of the issue.

20 To go a little bit deeper, APHIS  
21 has a -- sister, USDA sister, APHIS, has  
22 guidance documents that support exactly how we

1 produce our eggs with our hens. It's a porch  
2 system that's fully netted. We use a clear  
3 plastic roof. We provide about .15 percent  
4 square footage per bird. As past producers  
5 have testified, none of the birds want to  
6 really go out there. They really don't want  
7 to go out. You do see numbers going out  
8 there. Sometimes the porches are completely  
9 full. They should be bigger. I think that,  
10 you know -- I mean, we developed our organic  
11 system plan based on the rule that's presently  
12 in the register right now. So, our whole  
13 entire organic system plan was based on that.  
14 We built the porches on the barns, we added  
15 this at a lot, a lot of cost, millions of  
16 dollars in new equipment, buildings, putting  
17 the porches on. And, again, just to reiterate  
18 that with the square footage recommendations  
19 that you've put out there, we certainly would  
20 not comply, and we would be out of business as  
21 soon as the rules were enforced.

22 So, we feel that the hen's welfare

1 and safety issues are -- the hens will be  
2 better protected in this type of a system, a  
3 porch system with a roof, a clear roof. We  
4 use a clear roof over the top of it. It's  
5 completely netted all the way around. We're  
6 in total agreement with expanding the outdoor  
7 access area, but under a porch system.

8 The only other thing that I wanted  
9 to touch on is that we believe that the three  
10 pounds per ton for the methionine in the first  
11 starter formula is crucial in allowing the  
12 chick the proper amino acids to develop at the  
13 young stage of life. And that's all I have.

14 CHAIRPERSON GIACOMINI: Questions?  
15 Katrina.

16 MS. HEINZE: We've heard a lot  
17 today about how the FDA Egg Safety Rule is in  
18 conflict with what the Livestock Committee has  
19 recommended. I guess I'm wondering, there's  
20 a lot of free range eggs out there, how --  
21 what's your understanding of how the  
22 producers of free range eggs are going to meet

1 the Egg Safety Rule?

2 MR. BEAUREGARD: Well, free range  
3 -- or the requirement is any producer that has  
4 3,000 or more birds must meet these  
5 requirements. So, free range egg producers  
6 that have more than 3,000, and I guess that's  
7 my question, is that environmental testing  
8 going to be enforced on a 700-acre plot. If  
9 we're going to free range our hens, we would  
10 need 700 acres of land to do so at 100 hens  
11 per acre. And how would you plausibly  
12 environmentally test that for the FDA  
13 regulations?

14 MS. HEINZE: So, I guess my  
15 question is, so you don't know how a current  
16 non-organic free range egg producer would be  
17 meeting the new Egg Safety Rule.

18 MR. BEAUREGARD: Well, currently,  
19 there's no enforcement. It's a new rule that's  
20 coming out.

21 MS. HEINZE: Right. But,  
22 presumably, they thought about it, or they're

1 going to lose their business -

2 MR. BEAUREGARD: Right. But if  
3 they have under 3,000 birds, they wouldn't  
4 have to.

5 CHAIRPERSON GIACOMINI: Thank you.  
6 No further questions. Thank you. I think  
7 let's -- that was Robert. Let's do Hal, and  
8 then we'll see how time is for possibly  
9 breaking for lunch.

10 MR. KREHER: Good morning. My  
11 name is Hal Kreher. With my four brothers and  
12 two cousins, I own a new organic egg farm near  
13 Buffalo, New York. We are currently producing  
14 eggs for Wegman's, and Tops chain of grocery  
15 stores. We have been organic crop farmers for  
16 over 10 years.

17 I support the Methionine Task  
18 Force recommendations that were brought up  
19 earlier. I apologize if some of my comments  
20 are repetitive. I had it all written out.

21 I was on a conference call  
22 listening to the USDA Organic Working Group

1 Stakeholders meeting two weeks ago, and one of  
2 the speakers spoke about access to organic  
3 food, and how to grow the sector. This brings  
4 up a very good point, and one that I think  
5 many people struggle with, and that is whether  
6 or not organic products should be available at  
7 chain grocery stores. Should people be able  
8 to get organic products wherever they shop?  
9 Most people purchase their foods at grocery  
10 stores, or should purchasing organic food  
11 require a drive out to the country? Is  
12 organic food for everyone, or just the elite?  
13 Should we try to spread organic practices  
14 across the entire agricultural sector, or  
15 should it be for small farms only?

16 I think there's a main concern  
17 with the current situation regarding organic  
18 egg production, and that we currently have a  
19 supply that is dependent on farmers that have  
20 approached production on a commercial scale.  
21 Many of the organic farmers are housing flocks  
22 in the 30,000 hen range. If this style of

1 production is not followed through requiring  
2 excessive outdoor area, a large segment of  
3 organic food production will be lost. This  
4 will decrease the access to organic food.

5 I personally do not believe that  
6 access to organic food should be limited to  
7 the very wealthy, or those who live in a rural  
8 area. Most people purchase their food at a  
9 grocery store, and in order for them to  
10 purchase organic eggs, they must be available  
11 at a grocery store. In order to supply these  
12 large customers, a large number of hens is  
13 required.

14 My farm is also certified by the  
15 American Humane Association, and according to  
16 their website, the American Humane Association  
17 created the first welfare certification  
18 program in the United States to insure the  
19 humane treatment of farm animals. The American  
20 Humane Certified Program provides third-party  
21 independent verification that certified  
22 producers care and handling of farm animals

1 meets the science-based animal welfare  
2 standards of American Humane.

3 It's important to note that the  
4 standards developed by American Humane were  
5 not developed by farmers, they were developed  
6 by animal scientists, and ethicists. The  
7 program, and other third-party auditors humane  
8 care programs we've already heard about covers  
9 every aspect of animal husbandry, as it  
10 relates to the care and raising of chickens.

11 It's much more comprehensive than what has  
12 been developed by the Livestock Committee. I  
13 do not mean to criticize their efforts, as I  
14 realize that they spent many hours to develop  
15 the care standards. However, there already  
16 exists several of these programs which would  
17 fulfill the same requirement, and actually are  
18 much more comprehensive to insure that animals  
19 are treated humanely.

20 My proposal is that rather than  
21 spending many more hours debating what should  
22 and should not be included, that, instead, the



1 National Organic Program require the following  
2 of the standards off a list of acceptable  
3 programs. This list would include American  
4 Human Certified Program, Humane Farm Animal  
5 Care Program, and some others.

6 One benefit would be that if the  
7 standards change due to further research, it  
8 would not require a change to the National  
9 Organic Program. Another benefit of using one  
10 of these third-party audited systems is that  
11 they utilize auditors whose sole focus is the  
12 care of the animals. When they inspect a  
13 facility, they are already familiar with the  
14 standards as they apply to that animal  
15 species. Their inspection is quite thorough,  
16 and quite possibly more than can be handled by  
17 the usual organic inspector, who is already  
18 tasked with understanding fields, crops,  
19 inputs, et cetera.

20 We have already talked about space  
21 allowance. I kind of wanted to talk a little  
22 bit more about the multilevel aviary system,

1 but I see I'm running out of time.

2 There's no need for the NOP to  
3 develop stricter standards than what is  
4 already considered humane by the organizations  
5 that are most concerned with humane treatment  
6 of animals.

7 Regarding outdoor access, I  
8 realize there are some folks who would prefer  
9 to buy their eggs from a small farm that has  
10 a flock of barnyard chickens. In order to  
11 fulfill this need and to differentiate the  
12 eggs produced in this manner, I propose an  
13 additional standard for free range or pasture  
14 poultry be included.

15 In fact, the humane programs I  
16 have already discussed, they have standards  
17 for this, and they're on the order of  
18 requiring one acre for 400 chickens. It would  
19 be very difficult to produce the volume of  
20 eggs that can be sold through grocery store  
21 chains in this manner, but it would also allow  
22 a differentiation for farmers that choose to

1 have a small flock of chickens.

2 There's already precedents for  
3 having different levels of organic. And, in  
4 fact, earlier we heard about differentiation  
5 proposed for beef production.

6 CHAIRPERSON GIACOMINI: Questions?

7 I apologize that you drew the short straw  
8 here. I'm going to come back to Jay's  
9 question. How would you, and for lack of a  
10 better term, the classic 30-second elevator  
11 speech, explain to a consumer the  
12 distinguishing differences between your  
13 operation and conventional?

14 MR. KREHER: I also have a  
15 conventional operation, so I'm very -

16 CHAIRPERSON GIACOMINI: Okay.

17 MR. KREHER: -- very able to talk  
18 about that. In fact, I have to talk to people  
19 about that all the time. The conventional  
20 production, the chickens are in cages.  
21 They're fed conventional feed. I don't see  
22 anything -- personally, I don't see anything

1 wrong with that. There are people who prefer  
2 organic products. The organic chickens,  
3 they're not enclosed in a cage, they can get  
4 out, they can run around the floor if they  
5 choose to. They can get around in the  
6 building. It's quite a bit different, and  
7 they're fed organic feed. Now, organic feed  
8 is, of course, produced without pesticides and  
9 herbicides, which, therefore, those pesticides  
10 and herbicides don't need to be produced. So,  
11 that's a benefit, I think.

12 CHAIRPERSON GIACOMINI: Joe.

13 MR. SMILLIE: You said your farms  
14 are near Buffalo?

15 MR. KREHER: Yes.

16 MR. SMILLIE: So, you'll be one of  
17 the experts on the snow up to the eaves.

18 MR. KREHER: Yes. And allowing the  
19 chickens out, is a big issue for us.

20 MR. SMILLIE: Well, I wanted to  
21 expound on that. So, what do you notice in  
22 your production during the winter months in

1 Buffalo, which are severe, and the summer  
2 months when your chickens are outdoors?

3 MR. KREHER: Our farm is quite  
4 new. Our first flock of organic hens is only  
5 about 30 weeks old at this point. Our  
6 veterinarian has advised us that they  
7 shouldn't go out when it's cold. They should  
8 stay inside when it's cold, and only go out  
9 when it's over 60 degrees. The temperature  
10 difference, when you open up a lot of these  
11 doors in the building, the building is  
12 depending on ventilation. The chickens in the  
13 house have to have ventilation, have to have  
14 air moving through there or they'll suffocate.  
15 So, when you open up all these buildings, all  
16 these doors for them, there's 36 doors in the  
17 house, and that creates now a ventilation  
18 problem.

19 CHAIRPERSON GIACOMINI: Okay.  
20 Thank you. I think this will be a good time  
21 to break for lunch. We're on schedule.  
22 Arnold Riebli will be up next, Lisa McCrory on

1 deck, Dave Will in the hole. Be back -- well,  
2 time-wise, we'll be back at 1:00.

3 (Whereupon, the proceedings went  
4 off the record at 11:46 a.m., and resumed at  
5 1:01 p.m.)

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1 A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

2 1:02 p.m.

3 CHAIRPERSON GIACOMINI: We have a  
4 quorum and we're going to move on. We've had  
5 a number of requests that I'm not being  
6 ruthless enough on cutting off questions and  
7 we're about one-third of the way through and  
8 we should be half. We're fairly way behind.

9 So, is Arnold Riebli here? Okay.

10 Lisa McCrory, on deck. Dave Will.

11 MR. RIEBLI: Good afternoon.

12 I'll try not to put you all to  
13 sleep since you all just had a big meal.

14 Valerie, welcome to California.

15 And on behalf of the California taxpayers you  
16 may have to turn off the light when you leave  
17 California.

18 My name is Arnold Riebli. I'm a  
19 fourth generation farmer and egg producer from  
20 Sonoma County, California.

21 My partners and I and our families  
22 have been producing eggs in Sonoma County on

1 a commercial basis for over 100 years.

2 Collectively today my partners and  
3 I have well over 300 years of practical  
4 experience. We were organic before organic  
5 was organic.

6 When our families first started in  
7 the egg business, all of our production was  
8 entirely of the floor or cage-free type.

9 In the late 1940s into the early  
10 1950s we transitioned over to a battery cage  
11 type systems because we found these systems to  
12 be a better technology break for us. The  
13 primary reason for transitioning over was  
14 animal health and in essence safety.

15 Over the years we have seen many  
16 different types of cage systems come and go.  
17 About seven years ago we started to experience  
18 a demand for organic eggs and as reasonable  
19 businessmen we responded by adding organic  
20 production to our conventional production --  
21 to our conventional product lines.

22 So, it is, I believe, fair to say



1 that we have a significant amount of practical  
2 experience even to the point of possibly  
3 calling us experts in the field of egg  
4 production.

5 Today I'd like to address four  
6 items that are up for consideration.

7 They are number one, space  
8 allowance for an egg-laying hens.

9 Number two, outside access for  
10 egg-laying hens and the need to increase the  
11 space allowance.

12 Use of Methionine in egg-laying  
13 hen feed rations.

14 And, number four, the condition of  
15 vegetation that must be used in egg-laying  
16 pastures.

17 First, space allowance. We  
18 understand that there is a consideration being  
19 given to increasing the minimum floor space  
20 from 1.2 square feet of floor space to 1.8.  
21 We question the reasoning.

22 When we look at broiler meat

1 production we notice the space allowance for  
2 a broiler is one square foot. The average  
3 mature egg-laying hen weights approximately  
4 3.5 to 3.8 pounds per hen. The average mature  
5 broiler weight 6 to 8 pounds per bird.

6 When we observed mature egg layers  
7 in our current barn, we believe that the hens  
8 have more than adequate floor space. Hens are  
9 naturally social and they will group up.

10 To require us to increase this  
11 floor space would also mean a one-third  
12 reduction in our total bird capacity, thereby  
13 requiring us to either build more capacity to  
14 an approximate cost of \$40 per hen or to  
15 reduce our total production and thereby  
16 failing to meet the current demand. No matter  
17 which course we take, it means a higher cost  
18 to the consumer. From a practical  
19 perspective, we do not support nor do we  
20 believe that this added space requirement is  
21 either necessary or wise.

22 Number two, outside access. We

1 question the rationale for required outdoor  
2 access for young birds during their rearing  
3 age and the amount of space required  
4 throughout their access for adult layers.

5 First, let me address the young  
6 birds. On our pullet-rearing farms we have a  
7 significant amount of wild life in the form of  
8 wild duck, wild geese, starlings, swallows,  
9 pheasants and quail. In the early stages of  
10 a young pullet's life she has little or no  
11 immunity to any type of viral challenge. She  
12 gets these immunities through vaccinations  
13 that are administered to her during the first  
14 15 weeks of her life and it usually takes two  
15 weeks to develop an immunity.

16 The consideration being given to  
17 require outdoor access starting at six to  
18 seven weeks of age flies in the face of good  
19 animal health practices so say nothing of  
20 exposing the young pullet to outside ambient  
21 temperatures that cannot be controlled.

22 It is absolutely imperative the

1 young birds be kept at 73 degrees Fahrenheit  
2 or above. As far as older hens are concerned  
3 and I would ask, why do you need the same  
4 space outside that I need inside. All of the  
5 birds will never be in the same place at the  
6 same time. Even when given the opportunity to  
7 be outside, some if not most will just simply  
8 refuse to do so.

9 As far as allowing outside access  
10 on a daily basis, unless weather did not  
11 permit, we would ask, how are we supposed to  
12 handle mud? That's a situation that exists in  
13 California for about six months out of the  
14 year.

15 Methionine. I, we agree with the  
16 recommendation that are being put forth by a  
17 methionine subcommittee. Very simply put,  
18 that without synthetic methionine we would  
19 have to increase the crude protein of a layer  
20 diet to a point where the layers' overall well  
21 being would be threatened. Anything below a  
22 minimum four pound level would be a challenge.

1                   Number four, required vegetation.

2                   In the outdoor access areas, well-

3                   -

4                   CHAIRPERSON GIACOMINI: Can you  
5 wrap that one up?

6                   MR. RIEBLI: I'm sorry?

7                   CHAIRPERSON GIACOMINI: Your  
8 buzzer went off. Can you wrap up that last  
9 point?

10                  MR. RIEBLI: Okay.

11                  Let me say, if we had to put birds  
12 out in the summer because of no rain the birds  
13 would dilute the yard of vegetation, within a  
14 period of time we could not live up to the  
15 vegetation standards.

16                  Thank you.

17                  CHAIRPERSON GIACOMINI: Questions  
18 from the Board?

19                  Thank you. Okay.

20                  Lisa McCrory and Dave Will on deck  
21 and Robin Allen in the hole.

22                  MS. MCCRORY: Good afternoon.

1                   Hopefully there's copies for  
2 everybody.

3                   My name is Lisa McCrory and I work  
4 for the Northeast Organic Dairy Producers  
5 Alliance, an organic dairy farmer organization  
6 with a membership of 836 organic dairy  
7 farmers.

8                   NODPA's mission is to enable  
9 organic dairy farm families situated across an  
10 extensive area to have informed discussion  
11 about matters critical to the well-being of  
12 the organic dairy industry as a whole.

13                   I'd like to provide some comments  
14 on a few areas. First, would be in regards to  
15 the livestock committee recommendation  
16 regarding clarification of 205.238. We  
17 strongly disagree with this recommendation by  
18 the livestock committee and we agree with the  
19 minority opinion.

20                   Economic or management challenges  
21 should not be a valid argument to weaken  
22 organic standards. Rather than making the use

1 of substance enzymes 205.603 easy, there  
2 should be a cost involved with using them so  
3 that organic farms develop different  
4 management strategies to eliminate their use.

5 If the young animal's mother was  
6 treated with the 205.603 substance with a  
7 withholding time, the young animal would be  
8 better off with a surrogate organic mother  
9 until the withholding time has expired. That  
10 may prove difficult with some farms but  
11 organic rules shouldn't be enacted to make  
12 things easy.

13 We support the minority opinion  
14 that 205.238 (c)(i) should be amended as  
15 follows. Milk from animals undergoing  
16 treatment with a substance allowed under  
17 205.603 that has a withholding time cannot be  
18 sold as organic or fed to organic livestock  
19 during the withholding time period.

20 And my comments are pretty  
21 condensed because it's a six-page comment  
22 document that you've got. So, I'm going to be

1 skipping over a few things.

2 The other area of comment that I  
3 wanted to voice was invitation for public  
4 input on stocking rate charts. And we  
5 strongly believe that organic animal welfare  
6 guidance and standards must be sensible and  
7 based on reasonable standards that are  
8 determined by the realities of farming, good  
9 husbandry, grazing, nature animal behavior and  
10 natural healing.

11 That said, we recognize the  
12 importance of requiring adequate space for  
13 animals to exhibit their natural behavior  
14 during the non-grazing season or during times  
15 of temporary confinement.

16 NODPA recommends that the  
17 livestock committee can reconsider the  
18 stocking density rate to calculate rates per  
19 weight and not per animal to insure more  
20 accurate space allocation. Such practices are  
21 common in the EU. And we believe that the  
22 USDA certified organic animal welfare



1 standards should meet or exceed the standard  
2 which applies to all animals in the EU.

3 Animals increase in size and  
4 weight during their lives and vary by breed.  
5 Calculating stocking densities by animal  
6 instead of by weight can most increasingly  
7 cramp conditions as the animals grow and  
8 cannot be applied to young stock except by  
9 using animal equivalents which are misleading.

10 And as for 205.236 origin of  
11 livestock we understand that the NOP is in the  
12 process of writing an ANPR on 205.236, origin  
13 of livestock and NODPA and food farmers  
14 recommend that the proposed rule on origin of  
15 livestock follow the principles that were  
16 outlined in the preamble of the December 21,  
17 2000, Federal Register of the NOP final rule.

18 We do not request any exemptions  
19 to this rule. Some have advocated for  
20 transition cows and heifers to be sold as  
21 organic. Allowing transitioned animals to be  
22 sold as certified organic creates a loophole

1 that will be exploited and transition animals  
2 are technically not organic.

3 A transitioned animal is certified  
4 to produce organic milk but cannot be sold for  
5 organic slaughter and should be allowed to be  
6 sold and should not be allowed to be sold as  
7 an organic dairy animal. If culled from the  
8 herd a transitioned animal should be sold into  
9 the conventional market.

10 There will be no decrease in the  
11 asset value to the producer as the organic  
12 original value of the livestock was as a  
13 conventional animal and the producer has  
14 recouped any expense incurred in transitioning  
15 to organic certification through the premium  
16 received from organic milk produced.

17 A transitioned animal by  
18 definition did not have organic management  
19 through its life so on and so forth.

20 And for the sake of time, I think  
21 you get my point. There's a lot more detail  
22 as to why and we wait with baited breath to

1 see what the livestock -- the organic  
2 livestock standards are going to look like and  
3 thank you very much for listening.

4 Do you have any questions?

5 CHAIRPERSON GIACOMINI: Questions  
6 from the Board?

7 Seeing none, thank you very much.

8 MS. McCRORY: Thank you.

9 CHAIRPERSON GIACOMINI: Dave Will.  
10 Robin Allen on deck. Dave Carter in the hole.

11 MR. WILL: Good afternoon.

12 As a fellow Californian, I also  
13 would like to extend my welcome to our great  
14 state and please leave any spare change you  
15 have with Arnie on the way out so he can  
16 forward it to the governor.

17 Just a couple of things. I'm with  
18 Chino Valley Ranchers and we are organic egg  
19 producers in Southern California and I'd like  
20 to first to start with thanking the NOSB for  
21 all the consideration you're given on our  
22 petition and where we are today.

1                   Also, as a member of the task  
2                   force, I'd like to personally thank Dave  
3                   Martinelli for getting a group of egg  
4                   producers and broiler producers throughout the  
5                   United States to gather to actually talk about  
6                   one subject in a coherent fashion. And I  
7                   appreciate your hard work on that. It wasn't  
8                   easy, I know. So, thank you.

9                   A couple of minor issues. We do  
10                  support the pullet concerns that Dave  
11                  mentioned. You'll also hear from the OTA and  
12                  I believe UEP put in their writing.

13                  And one thing that we felt we left  
14                  out was at 27 weeks of age, didn't pull that  
15                  out of the air for pullets. That's actually  
16                  the time the bird is fully feathered and has  
17                  reached its full adult weight, so there was  
18                  actually some science and understanding behind  
19                  why we put in 27 weeks considered the same as  
20                  a broiler.

21                  Fourth, we'd like to talk about  
22                  what sort of allowances there may be moving

1 forward to look at substances that currently  
2 are not on any list that are natural. Our  
3 nutritionist has actually been digging through  
4 some very interesting research and has found  
5 a couple of things that we'd like to be able  
6 to conduct in a small layer-trial full-scale  
7 so that we can get the full benefits of it,  
8 but we're concerned because this would be  
9 something in the realm of a natural non-  
10 synthetic, non-organic substance and whether  
11 or not that would lose our certification for  
12 that flock or those eggs.

13           Also, we tested the corn. We did  
14 bring in some of the high methionine corn back  
15 in January of '09 and sent it out for  
16 nutritional testing. We chose to pass because  
17 we got absolutely no significant differences  
18 between regular corn and high methionine corn  
19 at that point in time. And we were never able  
20 to ascertain a natural field cost on the  
21 product so it made it very difficult for us to  
22 move forward.

1                   Switching gears onto animal  
2 welfare.

3                   We just want to remind the Board  
4 to -- I know everyone looks at the Canadian  
5 standards and we've heard that a couple of  
6 times and as Greg mentioned, Canada is unique  
7 with the fact that they are on an egg quota  
8 and it makes it much easier for them to have  
9 the resources to develop systems and to have  
10 those sort of things in place. Any loss in  
11 production or land costs, they're capable of  
12 covering with the fact that they do have a  
13 quota system for eggs.

14                   Second, on the densities.

15                   We'd like to know if you guys have  
16 involved any of the major breeders.  
17 Basically, in the egg industry we're forced to  
18 buy our chicks from one of three or four  
19 companies. And they all have different  
20 standards for the inside space available for  
21 the birds and it basically monitors exactly  
22 what UEP, Free Farmed and American Humane have

1 also put out as a public standard of that 1.5  
2 foot per bird.

3 Third, on behalf of ourselves in  
4 Southern California, and I know there are  
5 several other egg producers in the rooms. We  
6 would all like to invite you out to an  
7 operating ranch. If you want to grab one of  
8 us I'm sure we could work something out. We'd  
9 love to have you out so that you can see some  
10 of the trials and some of the issues that we  
11 have to face.

12 I know Greg in the Midwest has  
13 wanted to extend it but he forgot to and we in  
14 Southern California would be more than happy  
15 to invite any of you out to take a look at our  
16 operation.

17 Fourth, we support outside access  
18 as a space requirement not as a land quality  
19 requirement because that takes into  
20 seasonability and the judgment by a certifier  
21 and we just feel that leaving that open to  
22 interpretation is not correct. We really

1 would like to see putting as some sort of  
2 space.

3           Also, you know, we have major  
4 concerns that are different than the dairy  
5 industry because our major contaminants fly.  
6 If pigs flew you might have a different  
7 response out of them, concerned about cows and  
8 swine crossing paths, but they don't  
9 fortunately. Our major predators and concerns  
10 do and that's one of the main reasons that we  
11 are so worried about birds with the avian  
12 influenza.

13           And then last a little bit of  
14 housekeeping. I was asked to remind the group  
15 that something was slightly misspoken earlier.

16           A positive environmental test  
17 right now for salmonella as the law is written  
18 will require four negative tests in a row  
19 which are two-week interval and that the eggs  
20 should be diverted but it does not require  
21 them to be diverted in the rule. So, if you  
22 have a positive for those tests then you're



1 subject to recall. So, good business practice  
2 would require or suggest that they are  
3 diverted. But it's not the way the law is  
4 written.

5 So, thank you for your time.

6 CHAIRPERSON GIACOMINI: Thank you.

7 Questions?

8 Seeing none, thank you.

9 Robin Allen, Dave Carter on deck,  
10 Beth Unger in the hole.

11 MS. ALLEN: My name is Robin  
12 Allen.

13 I'm the Director of Urban  
14 Livestock Verification as CCOF. I am  
15 responsible for the certification of  
16 approximately 1,770 crop operations and a 120  
17 livestock operations.

18 Thank you for this opportunity to  
19 make comments.

20 My comments today going to be  
21 directed at recommendations put forth by the  
22 Crops Committee and by the Livestock

1 Committee. So, if I may begin with my  
2 comments to the Crops Committee on production  
3 standards for terrestrial plants and  
4 containers and enclosures.

5 In short, CCOF feels strongly that  
6 this recommendation is misguided and should  
7 not be approved by the board.

8 It appears as though the  
9 recommendation is aimed at achieving two  
10 different objectives. One to prohibit  
11 hydroponics and aeroponics and two the set  
12 production standards for green houses.

13 I want to address these two  
14 objectives separately.

15 Regarding the outright prohibition  
16 of aeroponics and hydroponics, CCOF does not  
17 believe that this is necessary, though we  
18 understand at this point it may be a foregone  
19 conclusion due to international trade issues.

20 Please remember that all certified  
21 operations, not just soil-based farmers, are  
22 already required to maintain or improve the

1 natural resources of their operation including  
2 soil and water quality.

3 The recommendations/rationale for  
4 prohibiting hydro and aeroponics due to lack  
5 of soil does not also take into account the  
6 fact that the organic community has agreed  
7 that other types of crop productions that are  
8 not soil-based should be allowed, including  
9 wild grown mushrooms and aquacultural such as  
10 health.

11 It does not seem reasonable to  
12 exclude hydro and aeroponics based on this  
13 rationale and while continuing to allow these  
14 other types of productions we are doing.

15 There are also ramifications for  
16 other crop producers which I do not feel are  
17 adequately addressed. As written, the  
18 recommendation would prohibit the production  
19 of organic sprouts. Commonly grown sprouts  
20 such as alfalfa and sunflower are both  
21 normally terrestrial vascular plants being  
22 grown in a soilless environment.

1                   As the rule specifically discusses  
2                   sprout production into 205.204(a)(i) and many  
3                   sprout producers are currently certified, we  
4                   do not believe that sprout production should  
5                   be prohibited.

6                   In addition to overlooking  
7                   sprouts, the recommendation would create a  
8                   very problematic situation for types of  
9                   transplants and annual seedling production.  
10                  Many transplants are grown in a media such a  
11                  ProLight or Vermiculite which do not meet the  
12                  recommendations requirement for a compost-  
13                  based growing media which can support proper  
14                  soil biology.

15                  We ask that you carefully consider  
16                  all of the ramifications of this  
17                  recommendation and that you do not pass the  
18                  recommendation that would prohibit sprouts or  
19                  inhibit the production of transplants or  
20                  annual seedlings organic production.

21                  Separate from these issues  
22                  stemming from the section on hydroponics and

1       aeroponics are the issues stemming from the  
2       recommendation standards for greenhouse  
3       production.

4               As we commented at the previous  
5       NOSB meeting, CCOF believes that these  
6       production standards are overly prescriptive  
7       and redundant to other parts of the NOP  
8       regulations and are therefore unnecessary.

9               The requirements in the  
10       recommendation duplicates requirements already  
11       found in other sections of the rule such as  
12       the recommendation states that prohibited  
13       materials may not be used in a growing media  
14       and that commingling and contamination must be  
15       prevented and that organic and non-organic  
16       crops must be labeled.

17               We do not believe that there's a  
18       widespread problem with commingling or  
19       contamination in greenhouses to the extent of  
20       wording such lengthy yet narrow requirements.  
21       The problem that this recommendations seems to  
22       be trying to solve just doesn't exist.

1                   Those of you who work with  
2                   livestock operations affected by the recent  
3                   pasture rule publication may be sympathetic to  
4                   the repercussions of subjecting a small  
5                   segment of the organic community to lengthy  
6                   and prescriptive requirements.

7                   When it comes to organic dairy,  
8                   there was a consensus there was a problem in  
9                   the lack of regulations that needed to be  
10                  addressed. In the cases of greenhouse  
11                  production, this is not true.

12                  Lastly on the subject, we're  
13                  concerned that the recommendations allowance  
14                  of supplemental carbon dioxide is by-passing  
15                  the       petition and review and approval  
16                  process to allow synthetics on the National  
17                  List. Carbon dioxide from a tank as used in  
18                  greenhouses is likely from synthetic sources  
19                  and we cannot support a recommendation that  
20                  would circumvent the lifting process for  
21                  synthetic materials.

22                  So, for all these reasons, CCOF

1 cannot support the recommendation and we ask  
2 that the committee vote it off the table.

3 Next, I'd like to comment on the  
4 recommendations from the Livestock Committee.

5 First, we'd like to express our  
6 support for the majority opinion regarding a  
7 recommendation for clarification of  
8 205.238(c)(i), so we do support something  
9 sometimes.

10 Second, regarding the definition  
11 of the animal health care products, I do  
12 sincerely appreciate that you recognize  
13 there's a catch-22 inherent in the regulations  
14 that limits the use of preventative and  
15 homeopathic health care products. However,  
16 the recommendation to add a new definition for  
17 animal health care products doesn't solve the  
18 problem.

19 The definition of animal drugs in  
20 NOP which references the definition provided  
21 by the Federal Food, Drug and Cosmetic Act  
22 includes preventative and homeopathic products

1 in the definition of a drug.

2 Under 205.238(c)(ii), animal drugs  
3 may not be used in the absence of an illness.  
4 Adding a definition doesn't cancel out this  
5 contradiction.

6 In my written comments I provided  
7 three suggestions for technical corrections  
8 that could solve this problem, including  
9 clarifying the wording of 238(c)(ii) to either  
10 state producers must not administer any  
11 synthetic medication allowed under 206.053  
12 other than vaccinations in the absence of an  
13 illness or administer any drug other than  
14 vaccinations homeopathic or preventative  
15 products in the absence of an illness.

16 That's it.

17 Questions?

18 CHAIRPERSON GIACOMINI: Someone's  
19 paying attention.

20 Questions? Questions for Robin?

21 Joe.

22 MR. SMILLIE: Could I get a



1 response from Crops Committee on the sprouts  
2 issue. Did you consider that?

3 Anybody?

4 MS. ELLOR: Yes. We did and we'll  
5 probably go back in the committee with that.

6 MR. SMILLIE: Okay.

7 MS. ELLOR: I was -- actually we  
8 got a lot of good suggestions. We'll probably  
9 go back to the committee before it comes to  
10 the floor.

11 MS. ALLEN: Thank you.

12 CHAIRPERSON GIACOMINI: Thank you.

13 Dave Carter on deck. Gay Timmons.

14 MR. CARTER: Thank you.

15 Members of the Committee, NOP.

16 I'm Dave Carter, a survivor of this body here  
17 today speaking on behalf of a group of organic  
18 pet food manufacturers working under the  
19 auspices of the Pet Food Institute.

20 Before I start though I want to  
21 welcome the new NOSB members. You're  
22 beginning about five years of the most

1 frustrating and interesting part of your  
2 career that you can imagine. And I also want  
3 to thank Valerie Frances for your work as  
4 Director for the NOSB. You've been a great  
5 resource.

6 Very briefly. The whole area of  
7 pet food has been confusing from the very get-  
8 go. From October 2002 when companies moved  
9 forward to engage in sort of an occasion to  
10 sort of market their products.

11 But particularly after 2004, when  
12 first of all the scope document came out and  
13 said that pet food couldn't be certified and  
14 then it was later corrected and said, well,  
15 yes. It can as long as it complies with  
16 205.605, the human food standards rather than  
17 603, the livestock feed.

18 There's been an effort on the part  
19 of certifiers and the companies to move  
20 forward in compliance with 605 in the midst of  
21 a confusing playing field.

22 Some further confusion and concern

1 was added earlier this year when the letter  
2 came out to some of the certifiers saying that  
3 pet foods that are complete and balanced can  
4 no longer be certified because they were --  
5 because they contained nutrients not listed on  
6 104.20 which is mentioned in 205.605.

7 And let me just stop and say  
8 complete and balanced is the be all, end all  
9 of pet food. Because pet food is a sole  
10 source diet. It's one bowl of food every day  
11 that that companion animal gets all of its  
12 nutrition from, that food product has to have  
13 all of the nutrients that that animal needs  
14 and that's established by AFCCO to comply with  
15 FDA. So, there was a lot of concern and chaos  
16 coming out of that.

17 I am particularly pleased that  
18 Miles in his report yesterday gave us a road  
19 map to help address a lot of this.

20 There's four particular areas.

21 First of all, number one is to say  
22 that developing the pet food regulations is a

1 priority. Again, coming out of all the  
2 confusion in 2004, there was the establishment  
3 of the Pet Food Task Force delivered its  
4 report to this group which was pretty much  
5 adopted in toto in November of 2008. Probably  
6 one of the best recommendations I've seen in  
7 terms of being a ready-made regulation that  
8 can move forward.

9 We're very pleased that NOP has  
10 put that on their work plan.

11 Secondly, is the request from the  
12 NOP for this group to re-evaluate the  
13 recommendations for nutritional vitamins and  
14 minerals as to try and update the  
15 recommendation that was made in 1995 by the  
16 NOSB at that time.

17 Third, and this is a critical one.  
18 Was the acknowledgement in the memorandum  
19 yesterday that certifiers and operations have  
20 been playing by the rules as those rules were  
21 defined and interpreted by the program in 2006  
22 and 2007. And that's critical because we have

1 so many folks out there that have been the  
2 good players. They have rolled up their  
3 sleeves, they've done the heavy lifting to try  
4 and develop their formulations in compliance  
5 with the National Organic Standards as  
6 interpreted by the National Organic Program.

7 Now that we have the program  
8 moving forward with a different  
9 interpretation, and with the consultation by  
10 the FDA, there's a couple of things.

11 Number one, is we want to make  
12 sure that the FDA folks from the Center for  
13 Veterinary Medicine are brought into the  
14 discussion. But the last point is that the  
15 comments in his memorandum, in Miles'  
16 memorandum yesterday, that there will be draft  
17 guidance on how to comply with the new  
18 interpretation. And that there will be a time  
19 period including the 60-day comments. I think  
20 that that helps give us some breathing space  
21 which is critical because we need to have the  
22 ability for those companies to move forward

1 and continue to market those products while we  
2 get the ground rules clarified.

3 So, let me just -- three things in  
4 summary.

5 Number one, is we need to start  
6 ASAP on the regulations.

7 Number two, is you can expect some  
8 petitions to be coming in on some of the  
9 nutrients that are essential. They are not  
10 supplemental. They are essential for  
11 companion animals.

12 And, number three, is that we do  
13 need to have this transitional period, the  
14 breathing space, so that we don't have the  
15 business interruption. Because in summary,  
16 this isn't just about pet food. I'm in the  
17 livestock business. It's about carcass  
18 utilization in our business is that if you're  
19 trying to get all of your organic premium off  
20 of the tenderloins and the ribeyes and the  
21 strips, and you can't get an organic premium  
22 off of those other ingredients, you simply

1 cannot compete in the market place. Pet food  
2 has been a critical component of allowing  
3 these companies that manufacture the human  
4 foods to be competitive in the marketplace.

5 Thank you very much.

6 CHAIRPERSON GIACOMINI: Thank you.

7 Any questions?

8 Thanks.

9 Beth Unger, Gay Timmons, Sheila  
10 Linderman in the hole.

11 MS. UNGER: I'm Beth Unger from  
12 CROPP Cooperative. A farmer-owned cooperative  
13 that markets organic products under the  
14 Organic Valley and the Organic Prairie label.

15 I am here to speak to you  
16 primarily methionine today. I'm going to say  
17 it one more time and then we'll go on to other  
18 topics.

19 So, first I think the Livestock  
20 Committee put a lot of time and effort into  
21 their recommendation for the methionine  
22 listing, a continued listing with a step down

1 thing. But I have a few problems with it.

2 I think that we need to go back  
3 and take a look at process and reconsider this  
4 in another way. The TAP review in the handout  
5 that everybody received is notes that Barbara  
6 Robinson had made in response to the initial  
7 TAP review that was done for methionine.

8 This particular TAP review was  
9 held up as a biased piece of work and  
10 incomplete and it was done so by the NOP and  
11 by the poultry industry.

12 Methionine is an essential  
13 nutrient. It is used in a very small amount  
14 and it is done for good solid animal welfare  
15 reasons. This is not a growth promotant.

16 The natural sources, you heard  
17 reports. There was, you know, a little this  
18 and that on the high methionine corn. Now  
19 we've got it at these levels. We tried it.  
20 It's didn't really work, you know. And  
21 there's a commercial availability issue. So,  
22 that's no where near.



1 I'm very interested to hear the  
2 gentleman from the University of Arkansas talk  
3 about the microbial trials that they're doing  
4 and what they're looking at. And then when  
5 you question him about that, it's years down  
6 the road. So, I think that we need to go back  
7 to the Methionine Task Force decision, take a  
8 good solid look at that once again, because as  
9 I reviewed the petition that the Livestock  
10 Committee put forth, I don't know where that  
11 step down came from. It's where is the  
12 science behind t? It is -- it is the lack of  
13 the science that brought us to where we are  
14 right now at this point in time.

15 The TAP review is discounted. We  
16 need a new TAP review and in the meantime  
17 until you have more information rather than  
18 just making a decision that pushes an industry  
19 to do something that does not exist at this  
20 time, go back, check on the science. And I  
21 would strongly encourage that the USDA spend  
22 a little time listening to this about no

1 funding available for this and the other thing  
2 on such a critical topic that nobody wants to  
3 hear about anymore.

4 We really need to rethink what's  
5 going on here and get some science behind this  
6 and do it right.

7 And that is what I have except the  
8 Methionine Task Force petition. Go back to  
9 that one, accept it and vote on it and request  
10 a new TAP review so that the next time we're  
11 back here talking about it we have better  
12 information available on that.

13 I really look forward to seeing  
14 you make a good decision on this in the  
15 future.

16 Now, haven't seen the one minute  
17 sign yet.

18 Stocking density. A lot of  
19 interesting discussion about that. I  
20 understand that certifiers are busy collecting  
21 a lot of information in terms of the Canadian  
22 equivalency agreement. Hopefully all of that

1 is going to go well. But I want to go back to  
2 the issue that this is a very large nation  
3 with a very diverse geography, different  
4 production systems, different requirements and  
5 I just don't see, first of all, that a table,  
6 a stocking density table is going to  
7 necessarily fit in all areas.

8 In some cases what was on that  
9 table will not be enough space for good animal  
10 care. And in other cases maybe you don't need  
11 quite as much space. So, it's like we're back  
12 to that same old thing that I bring every time  
13 and that is. Let this be a relationship with  
14 each producers and certifier to insure  
15 compliance with the standard.

16 Thank you.

17 CHAIRPERSON GIACOMINI: Questions?

18 Thank you.

19 Gay Timmons up, Sheila Linderman  
20 on deck. Jo Ann Baumgartner in the hole.

21 MS. TIMMONS: Hi. I'm going to be  
22 reading Sheila's also because she's not here.

1 CHAIRPERSON GIACOMINI: Do you  
2 want two fives or one ten?

3 MS. TIMMONS: Two fives. Actually  
4 maybe one ten. I'll keep the one ten.

5 My name is Gay Timmons. I'm with  
6 a distribution company. I've been working  
7 with organics since 1991.

8 And I want to thank everybody for  
9 having this at this end of the country. I  
10 went to school at Davis so it was really fun  
11 for me to drive here. I keep telling people  
12 I used to count tomato seeds as a way of  
13 getting through college right here in  
14 Woodland. It was not a good job. But I'm  
15 really proud to have people in California.

16 The 1990 Organic Food Production  
17 Act is a promise to consumers that they have  
18 access to organically produced foods that  
19 contain few if any synthetics.

20 I want to address the fact that  
21 over the past five years or so the NOP has  
22 presided over the organic certification of

1 synthesized non-food ingredients. As long as  
2 you guys are talking about synthetics and non-  
3 synthetics, let's get down to the hard core  
4 stuff.

5 These ingredients are synthetic  
6 under the definitions in the regulation and  
7 OFPA. They have been chemically changed and  
8 they have a new chemical identity. They do  
9 not exist in nature in isolation.

10 The products that are currently  
11 certified included but are not limited to  
12 organic or made with organic mono and  
13 diglycerides, seven different esters that I  
14 found, potassium cocoate and palmate and every  
15 other ate you can find out there that has to  
16 do with any -- that's any pontification of any  
17 oil. Glycerin, fatty acid ethyl esters,  
18 sulsinate ethyl palmate, distilled fatty  
19 acids, sucrose cocoate and palmate and there  
20 are a few other things as well.

21 Based on the processes and the  
22 policies used to certify those products, the

1 following list could also be certified. And  
2 I talked about this with my certifier and with  
3 two chemists. And basically it's the same  
4 processes as was used for the certification of  
5 the previously mentioned materials.

6 Monosodium glutamate, ethyl  
7 acetate, glycerol stearate, sodium isostearoyl  
8 lactylate, disodium coco-glucoside citrate,  
9 sodium cocoyl glutamate, et cetera, et cetera.

10 There's about 2,000 materials that  
11 fall into this. I'm totally making that  
12 number up. There are a lot of materials that  
13 fall into this category because it's  
14 processing that has been allowed to be used to  
15 certify these materials. So, it's methods  
16 plus materials.

17 This is obviously important  
18 because we have a potential for a very real  
19 mess. Certification of these ingredients and  
20 their inclusion in finished products has  
21 already occurred under muddy conditions. Need  
22 I raise the ghost of Arthur Harvey.

1 I'm asking the NOP and the NOSB to  
2 provide clarity and guidelines or to change  
3 the laws or to simply prohibit this practice.

4 Quite frankly, I don't care which  
5 thing you do, but right now I think it's very  
6 messy. It's very difficult for people to deal  
7 with decision-making if they own a business.  
8 Because I don't know if I should sell  
9 certified organic synthetics or not. I don't  
10 know if my customer is going to turn around  
11 and sue me because it gets de-certified. So,  
12 I think we need some sort of assurance of  
13 where we're going with this.

14 It's important to note that when  
15 making aroma chemicals, synthesis of a new  
16 chemical is the only goal. While we may all  
17 agree that there are chemical changes in food  
18 processing, they are generally a minute part  
19 of the whole. The result of traditional food  
20 production processes. In chemical  
21 manufacturing there is only one goal to make  
22 the unique chemical that does not exist in

1 nature and isolation.

2 Manufacturers take great risk in  
3 investing in new products and consumers  
4 deserve to trust the promises made to them by  
5 government. For both these parts of the  
6 community I ask these questions.

7 How can you certify as organic a  
8 synthesized chemical?

9 In multiple readings of the law  
10 and the regulation, there really does not  
11 appear to be an explicit prohibition of  
12 certification of synthesized ingredients.  
13 I've been reading the stupid thing for five  
14 years looking for that special line that says  
15 you can't do this and I don't see it.

16 At the same time, this seems to  
17 bed at odds with the intent of the law and the  
18 expectation of consumers as we have heard over  
19 and over.

20 Can the NOP or the NOSB provide  
21 guidance on this question?

22 Number two. If you look at



1 section 211 of OFPA which is you got to review  
2 it if it's synthetic and put it on the  
3 National List. What is, again, the guidance  
4 from the NOSB and the NOP on the use of  
5 organic synthetics that are not on the  
6 National List?

7 Process certification and chemical  
8 definitions are two separate realities.

9 Can one use organic glycerin at  
10 greater than five percent? Can you use non-  
11 listed certified organic synthetics in  
12 processed products under the law as it stands?  
13 Can we use certified organic mono and di  
14 glycerides in products other than drum drying?

15 While OFPA -- this is number  
16 three. While OFPA is a labeling law based on  
17 labeling laws, what is the impact of listing  
18 out the names of ingredients that no longer  
19 exist due to chemical reactions? Is it  
20 misbranding?

21 If I make sucrose cocoate, used as  
22 a emulsifier in food manufacturing, there's no

1 longer any coconut oil in the ingredient.  
2 It's a new chemical made from a reaction  
3 between the sugar and the coconut oil and  
4 calcium hydroxide. And it's allowed to  
5 purchase and you know that. And it has a new  
6 name.

7 How can you allow companies to  
8 list out the pre-reactive inputs to a chemical  
9 reaction as though they were actually in the  
10 bottle or the package. They're not there.  
11 And I evidently forgot the rest of that  
12 sentence. That's what happens when you've  
13 added too much.

14 So, my fourth and final question  
15 is simple.

16 What would consumer think when  
17 they pick up a product that contains certified  
18 organic mono and di glycerides?

19 I will share that I and other  
20 colleagues have asked this question and it is  
21 clear that most people in this industry are  
22 completely unaware that this is going on.

1       They think it's a joke.  It's not.  The  
2       products are out there.

3               I look forward to further guidance  
4       on this issue and I'll make this statement  
5       available to anybody who would like it  
6       electronically.

7               Please note that I've attached a  
8       listing from one of the certifiers of some of  
9       the materials mentioned and blacked out  
10      information about the company.  It's not about  
11      them.  It's about what's been certified.

12              So, that's the five minutes,  
13      number one.

14              CHAIRPERSON GIACOMINI:  That was a  
15      lot more than five minutes so you better go on  
16      with the second one.

17              MS. TIMMONS:  I read slow.  It's  
18      me.

19              Okay.

20              This is from Sheila Linderman and  
21      I'm reading it on her behalf.  I know nothing  
22      about it.

1                   Flavors should be removed from the  
2 National List by a sense of review for the  
3 following reasons all of which are of equal  
4 importance.

5                   Number one. There are literally  
6 hundreds of flavors that are already certified  
7 but are not required for use in products  
8 labeled as organic due to flavors being on  
9 205.605(a) as opposed to 205.606 which  
10 includes organic preference.

11                   When flavors were initially placed  
12 on the National List it was assured that  
13 compounded flavors could not be certified, yet  
14 the crafters of the National List had the  
15 foresight to include flavors non-synthetic so  
16 that processed organic foods could have  
17 increased palatability.

18                   Clearly creative flavor houses  
19 have learned to use organic resources to  
20 create organic compliant if not fully  
21 certified flavors. These efforts must be  
22 encouraged by making the use of certified

1 organic flavors mandatory in finished products  
2 labeled as organic and are organic.

3 Three. Compounded flavors are  
4 generally composed of plant extracts,  
5 concentrates, essential oils, distillates,  
6 isolates and aroma chemicals. They are often  
7 in carriers such as ethanol and neutral oils.

8 With the exception of some, not  
9 all are aroma chemicals. These components are  
10 agricultural and nonsynthetic and therefore  
11 certifiable.

12 Furthermore, a tremendous amount  
13 of land compared to the individual component  
14 quantity is required for production of these  
15 types of components, requiring that they all  
16 be organic would therefore promote organic  
17 agriculture which is our ultimate goal.

18 Regarding certain distillants and  
19 isolates which may fall into the general  
20 category of aroma chemicals, these may be  
21 difficult to obtain as organic due to the  
22 commercial availability of the raw materials

1 needed to produce these items. One item is  
2 alphol which is produced by steam distillation  
3 pine needles followed by fractional  
4 distillation to purify, then dehydration. All  
5 are allowed processes, but the availability of  
6 organic pine needs is tenuous at best.

7 Aroma chemicals of this type could  
8 be petitioned onto 205.606. Given the  
9 shortened time that items on this list need to  
10 be included, it may be presumed that growers  
11 could demotivate to increase the availability  
12 of organic raw materials.

13 Other aroma chemicals such as  
14 triethyl citrate produced by coming ethanol  
15 and citric acid are synthetic but have no  
16 negative impact on the environment. Such  
17 materials could be petitioned to 205.605(b)  
18 with an annotation requiring the use of  
19 certified organic ethanol.

20 The addition of these and other  
21 materials to the appropriate sections on the  
22 National List would increase the flavor's

1 range thereby increasing the number of  
2 certifiable flavors all the while increasing  
3 the demand for land that is dedicated to  
4 organic agriculture.

5 It's important to note that flavor  
6 -- removal of flavors from 205.605(a) and  
7 showing organic preference would result in  
8 certifiers requiring a greater understanding  
9 of how flavors are produced, not to mention  
10 clear definitions of synthetic and  
11 nonsynthetic and agricultural and  
12 nonagricultural.

13 One could postulate that removal  
14 of flavors from their current position could  
15 promote general clarity of definition and  
16 knowledge for all parties concerned.

17 Lastly, I'd like to lend my  
18 support in favor of Gay Timmons' position on  
19 the certifiability of synthetics, the organic  
20 certification of synthetics such as glycerine  
21 that is a byproduct of saponification flies in  
22 the face of virtually all organic tenants. At

1 the very best glycerine is made by  
2 saponification of organic oils which should  
3 not be allowed for use as an ingredient.

4 CHAIRPERSON GIACOMINI: Any  
5 questions?

6 Thank you.

7 Jo Ann Baumgartner, Zea and Bonnie  
8 Wideman.

9 MS. BAUMGARTNER: Hello. I'm Jo  
10 Ann Baumgartner for Wild Farm Alliance. We  
11 promote agriculture that protects and restores  
12 wild nature and strongly encourage the  
13 implementation of biodiversity natural  
14 resource conservation in NOP.

15 This issue was first brought to  
16 the NOSB in 2004 when it was decided later  
17 that the NOSB adopt biodiversity inspection  
18 questions into the model of organic food plan.

19 Last year the NOSB went further  
20 unanimously in making a recommendation to the  
21 NOP to comprehensively address biodiversity by  
22 having the NOP consider biodiversity when



1 reviewing materials that NOP would incorporate  
2 biodiversity trainings for certifiers, for  
3 inspectors. All organic farmers would add  
4 biodiversity into their farm plans.

5 Certifiers verified biodiversity as being  
6 implemented by farmers and NOP had  
7 biodiversity conservation to the checklist  
8 used by auditors when they are certifying.

9           So, we wanted to bring to your  
10 attention, so far these steps have not been  
11 taken and we'd like to suggest to encourage  
12 NOP to implement the NOSB recommendation  
13 without delay.

14           I was happy to hear that Miles  
15 with NOP yesterday said that biodiversity is  
16 on the priority list. Still, let's make sure  
17 that this urgent issue will be addressed soon.

18           Everyday rare species decline to  
19 the point of extinction. Agriculture's  
20 impacts to land and water resources are  
21 responsible in large part for the biodiversity  
22 crisis. As a natural systems we think

1       humanity loses because the system services  
2       they currently provide for free. The organic  
3       community can help to reverse the rate of loss  
4       and begin restoring the ecological  
5       infrastructure that provide viable soils,  
6       clean water and healthy food.

7                       So, to begin with, it would be  
8       helpful for the NOP to incorporate the  
9       material review work done by the NOSB into  
10      proper form so that science and tech at AMS  
11      can begin checking for positive and negative  
12      impacts of biodiversity.

13                      It's also important for the NOP to  
14      commence biodiversity conservation training  
15      which will then give a strong signal to all  
16      organic certifiers that they need to verify  
17      their farmers are putting conservation into  
18      practice.

19                      We applaud the CCOF for continuing  
20      to address biodiversity into getting this  
21      passed to require their farmers to fill out a  
22      broad set of diversity inspection questions

1 and for those other certifiers who have  
2 already done this in the past. But we feel  
3 that the playing field still needs to be  
4 leveled for all certifiers.

5 One of the most significant  
6 changes that could be made is to revise ARC  
7 review compliance checklist, a document that  
8 guides audits of NOP accredited certification  
9 agents so the questions about natural  
10 resources standard 205.200 are in every audit.

11 The recent NOP oversight report  
12 confirms that the ARC checklist is inadequate  
13 and needs revision. Standard 205.200, which  
14 states production practices must maintain or  
15 improve the natural resources of the operation  
16 putting soil, water, wetlands, woodlands and  
17 wildlife, is not in the checklist. With this  
18 revision and a comprehensive implementation of  
19 biodiversity conservation, the organic  
20 community will address intent in the letter of  
21 the law.

22 Organic farms benefit from

1 ecosystem services provided by biodiversity.  
2 Conserving native habitats on farms yield  
3 necessary pollen and nectar for bees and  
4 natural enemy insects, valuable hunting roofs  
5 and cover for rodent eating predators and  
6 critical vegetation that filters sediments and  
7 pathogens produces clean water and clean food  
8 for all.

9 I also want to briefly discuss  
10 food safety and land conversion. We have been  
11 advocating for the co-management of food  
12 safety and conservation since the E. coli  
13 0157:H7 spinach contamination in 2006. In the  
14 next year, we'll be working with -- working on  
15 a co-management guide for organic farmers with  
16 support from OMRI and some organic wholesalers  
17 so that the NOP and organic farmers and  
18 wholesalers can successfully influence and  
19 educate FDA as they write the safety rules and  
20 as they begin showing up on organic farms.

21 I had heard that the NOSB had  
22 wanted to address this issue and so I invite

1 any of you to be involved in this project.

2 Also, in NOSB's biodiversity  
3 recommendation last year, it was mentioned the  
4 controversial issue about land conversion and  
5 how native forests and grasslands are being  
6 converted to organic to avoid the three-year  
7 wait for clean land. And we'd like to work  
8 with the NOSB and NOP and NCAT on this issue  
9 and so you'll be hearing from us about that.

10 So, that's it. Oh, perfect  
11 timing.

12 CHAIRPERSON GIACOMINI: Thank you.

13 Jay.

14 MR. FELDMAN: Thank you for your  
15 comments on this.

16 I just want to get a better feel  
17 for what you think the timeline needs to be  
18 and whether you're getting the kind of  
19 response from NOP in terms of following  
20 through on the recommendations that were  
21 adopted by the Board and what specific  
22 schedule do you think needs to be adopted to

1 make sure that, you know, that we bring a  
2 greater sense of urgency to this issue  
3 perhaps.

4 MS. BAUMGARTNER: Yes. Thank you.

5 Well, the issue of addressing  
6 materials in biodiversity could happen right  
7 away or the NOP could deal with that right  
8 away because it sounds like the NOSB has  
9 already got it ready and the NOP just has to  
10 do something. And that's it.

11 As far as the ARC checklist,  
12 that's really critical. As soon as that  
13 205.200 was added to that checklist then  
14 everything changes. It really makes a level  
15 playing field for all the certifiers and then  
16 that will filter down across the landscape.

17 So, I'd love to see that happen  
18 right away.

19 Then training certifiers on what  
20 all this means is obviously crucial. So, yes.  
21 We're losing species every day across the  
22 planet.

1 MR. FELDMAN: Right. So, may I  
2 ask.

3 Do we know as a Board whether  
4 there's adequate follow up to this and  
5 incorporated into the audit standards and are  
6 we happy with how that's gone?

7 MR. SMILLIE: Yes. The program  
8 has got our recommendation and it's on their  
9 list for implementation. I don't know what  
10 else --

11 MR. McEVOY: Yes. NOSB has a  
12 final recommendation on biodiversity. It's  
13 going to be included in the guidance that we  
14 put out this summer, so it's part of the  
15 program handbook. We'll be implementing that  
16 particular recommendation. Rule changes as  
17 necessary so that will come out in staff  
18 guidance.

19 In terms of the review criteria --  
20 the ARC review criteria is under revision  
21 currently and we'll take this under advisement  
22 to see if we need to add more specific

1 information about biodiversity.

2 CHAIRPERSON GIACOMINI: Barry.

3 MR. FLAMM: First of all, I'd like  
4 to thank Jo Ann and the Farm Alliance for all  
5 the great work that you've done on  
6 biodiversity through the years and also on  
7 behalf of the Board I appreciate your follow  
8 up on the points that we approved a year ago  
9 and I think it's good to have this follow up.

10 I'm also particularly interested  
11 in this controversial subject but very  
12 important subject of land conversion and I  
13 hope we will -- that you will as an  
14 organization will pursue that and I hope the  
15 Board can play a role in this important  
16 factor.

17 So, thank you again.

18 MS. BAUMGARTNER: Thank you.

19 CHAIRPERSON GIACOMINI: Thank you.

20 Next up is Zea Bonneband, Bonnie  
21 Wideman on deck, Garth Kahl in the hole.

22 Just before Zea starts.



1                   Every once in awhile with this  
2                   system we seem to be, at least I am, picking  
3                   up a rumble. As I'm looking through the crowd  
4                   I think somehow it's picking up some of your  
5                   conversations and the way it reverberates  
6                   through the room so if we have any  
7                   conversations going on in the audience outside  
8                   of just a couple of word comments, and it's  
9                   going to last anymore than that, please take  
10                  them outside.

11                  Thank you.

12                  MS. BONNEBAND: Thank you very  
13                  much.

14                  I'm Zea Bonneband with California  
15                  Certified Organic Farmers. Policy Specialist  
16                  is my title. Materials girl is what I'm more  
17                  often known by historically.

18                  I've been coming to the meetings  
19                  from almost the beginning and have been -- was  
20                  the first TAP contractor so I've been so many  
21                  of these same discussions many times over.  
22                  And I want to touch on a few different

1 materials issues.

2 If I don't quick finish my inert  
3 portion of my talk feel free to ask me  
4 questions.

5 First, I want to say that CCOF  
6 does support the relisting of ferric  
7 phosphate. We feel that the petition should  
8 be evaluated thoroughly before you consider  
9 taking any other decision and our growers were  
10 in strong support of putting this on the list  
11 in the first place.

12 About the classification of  
13 materials, I've been working on this since  
14 1993 when we started on it and I think we've  
15 made great, great progress towards a solution.  
16 I'm concerned about the latest version being  
17 too processing centric and I'm going to defer  
18 to further comments to Gwendolyn Wyard who is  
19 going to give a more explanation about it.  
20 And also the written comments from PCO which  
21 I thought were very good that you could look  
22 at.

1                   I would like you to be careful  
2                   when you make a number of your recommendations  
3                   about how you handle materials and respect the  
4                   National List process. For instance, suddenly  
5                   seeing carbon dioxide in the greenhouse  
6                   document which is -- was deemed to be  
7                   synthetic in handling and is not on the  
8                   National List for crops should not just be  
9                   inserted into a greenhouse document without it  
10                  being petitioned. Likewise, argon is in the  
11                  100 percent listing and argon is not on the  
12                  National List.

13                  So, let's double check, do our  
14                  homework. Make sure what we're talking about  
15                  is in correspondence with the petition and the  
16                  National List process.

17                  Okay. I have submitted extremely  
18                  detailed comments about inerts because have  
19                  been working on this issue since the beginning  
20                  of materials lists as we know it for organics.

21                  I think the -- I really understand  
22                  your dilemma but I think the current document

1 as it's proposed is going to create a great  
2 deal of hardship for everyone involved,  
3 especially you and especially the growers who  
4 use the materials that are in question.

5 I think that what it boils down to  
6 for you is an extremely increased workload and  
7 you're not going to be able to find the  
8 information that you normally use to review  
9 materials because most of that is hidden in  
10 the EPA somewhere. It's not like these inerts  
11 have a lot of public available research about  
12 them.

13 And so what I was most  
14 disappointed about in the document was that  
15 the EPA was only mentioned as being a  
16 cooperator on the part to determine what's  
17 nonsynthetic on the EPA list, not in the  
18 further endeavors to try and solve the inerts  
19 program. And cooperating with the EPA is  
20 absolutely essential for you to be able to  
21 create a good inerts policy.

22 So, in this new era of, you know,

1 the NOP having increased budget and  
2 cooperation among all Federal agencies and the  
3 EPA taking some strides forward, I really urge  
4 you to create a more viable solution that  
5 involves working with the EPA.

6 For instance, it could be that the  
7 -- inerts could go into a program manual  
8 instead of on the National List. The EPA  
9 could help conduct the reviews of the things  
10 that for instance were reclassified to list  
11 for after 2004 or that are new or things like  
12 that. And then the NOSB instead could focus  
13 on developing the public statement about why  
14 inerts are even an issue and why they're  
15 compatible with organics.

16 It has been the past practice of  
17 the NOSB on occasions like this issue to  
18 create task forces. I've been on three NOSB  
19 task forces when never serving on the NOSB,  
20 including an inerts task force before the 2002  
21 law came into effect. And you could create an  
22 outside task force with some of us inerts

1 people, OMRI us and EPA representatives to  
2 help you come to a more realistic solution.

3 Alternatively, you could contract  
4 with OMRI or some group like that for inerts.  
5 And our main objective here I think in the  
6 whole organic farming community is to create  
7 as little disruption to the amount of  
8 materials that we use as possible.

9 Thank you.

10 CHAIRPERSON GIACOMINI: Thank you.

11 Any questions?

12 Jay.

13 MR. FELDMAN: Is it possible to  
14 easily come up with a list of inert  
15 ingredients among those products that are  
16 registered or are allowed for use in organic  
17 production?

18 MS. BONNEBAND: Possible.

19 Probably easy. No.

20 MR. FELDMAN: Is that something  
21 EPA could come up with relatively easily if we  
22 have a product names and --

1 MS. BONNEBAND: No.

2 MR. FELDMAN: For those on the  
3 registry.

4 MS. BONNEBAND: No. The closest  
5 would be OMRI who has an internal database of  
6 the inerts but they don't have it in their  
7 purview to have a, you know, a full-time  
8 person for a couple of months to pull it  
9 together in a format that would be useful, nor  
10 do they have the necessary the permission for  
11 the companies to provide that information.

12 MR. FELDMAN: Right. So, this  
13 wouldn't be produce-specific information. It  
14 would be an aggregate list.

15 MS. BONNEBAND: I understand that.

16 We did that. OMRI when -- as you  
17 know, the 2002 law was first published in the  
18 middle of 2000 or late 2000 so we had 18  
19 months before implementation. And OMRI did  
20 that. We created a list that I believe had a  
21 135 inerts, not linked to the brand name, gave  
22 it to the EPA and said. What do you think?

1 You know, we'd like these inerts either  
2 reclassified. Two lists -- if they're on list  
3 or set, you know, acknowledgement.

4 The EPA took most of the 18 months  
5 but they did turn it around. They  
6 reclassified 17, I believe. They told us we  
7 had -- we, OMRI, had to prohibit about five or  
8 six of them and they okayed most of the rest  
9 of them.

10 So, there is precedent for that  
11 but it's a big work load, I mean OMRI did it  
12 on their own time for the benefit of the  
13 organic community and that would be the  
14 factor.

15 MR. FELDMAN: But it can be done.  
16 I mean, what you describe is --

17 MS. BONNEBAND: You know, when the  
18 first inerts document came out three meetings  
19 ago maybe and it asked -- it was a call for  
20 tell us what you're approving and what's in  
21 it. Almost no certifiers came forward with  
22 that information because when it comes right



1 down to it, OMRI does most of the approval for  
2 EPA registered pesticides. There are a few  
3 out there in certifiers but relatively few.  
4 Most of them are OMRI. So, OMRI would be the  
5 bulk of the inerts that would be in play.

6 MR. FELDMAN: I really appreciate  
7 your comments on the EPA collaboration because  
8 I agree that that needs to be more specific in  
9 the proposal here.

10 What I hope we can get help with  
11 on this is this balance between angry farmers  
12 and angry consumers because the whole process  
13 that I think inerts raises is transparency for  
14 both the farmer and the individual who is  
15 choosing to use one product over another. And  
16 the consumer who can have confidence that this  
17 Board and USDA is adequately reviewing  
18 everything that goes into organic production  
19 and processing and handling.

20 And so what -- the dilemma right  
21 now and we're at a crossroads is whether  
22 organic wants to stay ahead of the curve

1 before EPA actually gets to the point of  
2 disclosing these products for the, you know,  
3 the user community which obviously will be  
4 traced back to the consumer community. It's  
5 all, you know, there's a relationship there  
6 certainly.

7 So, your help in figuring out  
8 where the resources are, you know. What OMRI  
9 can contribute, what EPA can contribute. The  
10 point is, I think we all want the same end  
11 goal here and we've got to figure out how we  
12 bring the resources together to get it done.

13 And I like the comment that was  
14 made earlier that it's not always easy to do  
15 what's right, you know, in the organic world  
16 but that's the challenge we've taken on.

17 MS. BONNEBAND: Right.

18 MR. FELDMAN: So, this is a key  
19 challenge. It may end up adding synthetics to  
20 the National List and that's an unfortunate  
21 reality, but we can take comfort in the fact  
22 that working together, all together, we see it

1 in our best interest to get these things  
2 reviewed and to have some accountability for  
3 meeting the standards of OFPA. And so  
4 appreciate it.

5 MS. BONNEBAND: Don't get me  
6 wrong. Organic farmers want to use things  
7 that are fully disclosed and are the safest  
8 possible choices.

9 MR. FELDMAN: Right.

10 MS. BONNEBAND: But they also need  
11 things that are going to work for the purpose  
12 that they're intended for.

13 MR. FELDMAN: Right. I think we  
14 can work this out. I just hope everybody  
15 wants to pitch in and see that it's in all of  
16 our interest from the user standpoint, from  
17 the consumer standpoint and it will especially  
18 if we're ahead of the curve, it will increase,  
19 you know, this sense of organic integrity.

20 Thank you.

21 CHAIRPERSON GIACOMINI: Katrina.

22 MS. HEINZE: I appreciate your

1        comments on classification. I'm looking  
2        forward to hearing other comments.

3                    You said that the definition that  
4        we showed this morning was too processing  
5        centric. And I'm wondering, do you mean it's  
6        too processing centric or it goes too far and  
7        expands the concept to crops and livestock?  
8        I just want to make sure I understand.

9                    MS. BONNEBAND: Well, as I briefly  
10       mentioned it to you at lunch, agricultural is  
11       not a term used in the construct of crop  
12       materials. And so to try and bring the  
13       concept of agricultural into the discussion on  
14       601, it just doesn't make it clear enough to -  
15       - I feel to crop inputs. And we very  
16       specifically want to prohibit things like  
17       mixing sodium nitrate and potassium chloride  
18       to get potassium nitrate.

19                    Now, in that instance, they're all  
20       minerals, but there are situations where  
21       something that's biological might get mixed  
22       with a mineral to create what we feel is a

1 chemical reaction, chemical chance that has  
2 not historically been accepted in organics.

3 MS. HEINZE: So, am I correctly  
4 interpreting what you're saying to say that we  
5 went too far to include crops?

6 MS. BONNEBAND: Yes. I would like  
7 to leave the agricultural out of a crops  
8 decision, even if it means a different  
9 decision tree and just stick to  
10 synthetic/nonsynthetic for crops materials.  
11 We don't want excessive heating for instance  
12 which is an accepted processing practice but  
13 excessive heating for minerals is not  
14 acceptable. And, you know, it's different.

15 As much as you want to try and  
16 make it the same and the same definitions on  
17 some situations implied, but there are some  
18 differences.

19 MS. HEINZE: Thank you for  
20 clarifying.

21 CHAIRPERSON GIACOMINI: Joe.

22 MR. SMILLIE: Can you think of any

1 examples of the one you cited because mineral  
2 to mineral is not what we're talking about?  
3 We're talking about mineral with agricultural.

4 Can you think of anything in your  
5 vast experience that --

6 MS. BONNEBAND: Of the biological  
7 material that --

8 MR. SMILLIE: Yes.

9 MS. BONNEBAND: Well, of course,  
10 you know, the classic one that we are often  
11 concerned about is fish products that besides  
12 the accepted stabilizers they may have other  
13 ingredients added and then there's a question  
14 about whether chemical change that boosts the  
15 fertilizer content happens. And this is the  
16 reason why fish products and aquatic products  
17 were put on the National List as synthetics  
18 because they have been stabilized in the  
19 chemical changes created and we're  
20 acknowledging that chemical change made them  
21 synthetic.

22 Because of after all, a

1 nonsynthetic in crops does not have to be  
2 petitioned. And so you can't -- if you make  
3 a definition that includes a lot of  
4 nonsynthetics, then a lot of companies are  
5 going to go out there and say. Oh, it's  
6 nonsynthetic under the definition and,  
7 therefore, we -- you know, it's really hard to  
8 challenge that because it's not like you have  
9 the petition process to go through and ask  
10 those questions.

11 CHAIRPERSON GIACOMINI: John.

12 MR. FOSTER: So, what's excessive  
13 heat? You said -- used the term excessive  
14 heat that --

15 MS. BONNEBAND: Yes.

16 MR. FOSTER: That baking bread is  
17 okay, but excessive heat is -- what is  
18 excessive?

19 MS. BONNEBAND: Asked ourselves  
20 that question a lot and it basically comes  
21 down to heat that's more than you would use in  
22 boiling something or baking something.

1       Because most minerals that are heated are in  
2       the thousands of degree heat range but we  
3       have, you know. In the review panel in OMRI,  
4       I don't think I'm disclosing anything  
5       confidential by saying that we see gradients.  
6       You know, we see things that are heated to 900  
7       degrees. Okay. Well, that's hotter than an  
8       oven gets, but is it -- you know, it's not the  
9       2,000 degrees they use to slate lime or  
10      whatever.

11                        So, you know, I used to try -- '93  
12      I was involved in trying to push the NOSB to  
13      say what temperature. You know, to say no  
14      combustion for minerals because we don't want  
15      combustion and we don't want excessive  
16      temperature, but what should that temperature  
17      be and that's hard to determine.

18                        MR. FOSTER: I have one more.

19                        CHAIRPERSON GIACOMINI: One more.  
20      Follow up. Go ahead.

21                        MR. FOSTER: Are fish products  
22      themselves synthetic by virtue of having say



1 phosphoric acid to it? Is the fish product  
2 itself synthetic by your thinking.

3  
4 MS. BONNEBAND: Okay, fish by  
5 itself is not synthetic. When you take fish  
6 but the products on the market we believe have  
7 undergone enough chemical change to the  
8 stabilization process that they are synthetic.  
9 That's why they're put on the National List.

10 CHAIRPERSON GIACOMINI: Jay.

11 MR. FELDMAN: On the atmospheric -  
12 - sorry. One more question.

13 On the atmospheric gasses -- inert  
14 atmospheric gasses you mentioned argon needing  
15 to be on the National List. Well, it needs to  
16 be petitioned, whether it would make it or  
17 not. I know nothing about argon so --

18 MR. FELDMAN: Okay. I mean, the  
19 comment earlier from Urvashi was that these  
20 ingredients are readily available in the  
21 atmosphere, therefore, I guess it qualifies as  
22 nonsynthetic, wouldn't need to be listed and

1           therefore falls within -

2                       MS. BONNEBAND:   That's not  
3           necessarily a --

4                       MR. FELDMAN:   -- presumably the  
5           100 percent.

6                       MS. BONNEBAND:   Yes.   That's not  
7           necessarily true.   When we -- as the TAP  
8           contractor I studied the gasses that we were  
9           petitioned and that they can be from synthetic  
10          sources.   I don't know about argon, but it can  
11          be.

12                      MR. FELDMAN:   Okay.   But we're  
13          talking about inert, right, atmospheric  
14          gasses?   Because a --

15                      MS. BONNEBAND:   Yes.

16                      MR. FELDMAN:   Because CCOF did not  
17          support the committee proposals is the way I  
18          understand it.

19                      MS. BONNEBAND:   Yes.   But that's  
20          partly from argon but also that has more to do  
21          with the 100 percent label and Jody will speak  
22          to that later.

1 MR. FELDMAN: Okay. Later.

2 Thank you.

3 MR. SMILLIE: Again, it's inert  
4 and atmospheric. Okay.

5 MS. BONNEBAND: Yes. Just like  
6 the carbon dioxide that I mentioned briefly.

7 We studied this extensively and  
8 there's an old petition in case Harvey went  
9 through as far as to declare it a nonsynthetic  
10 but it can be either one when you get it in a  
11 tank. When you get it from cow farts or  
12 whatever, it's natural.

13 MR. FELDMAN: There's also the --  
14 there's also the issue and I don't know if  
15 anybody here can help on this.

16 When you put inert, the word inert  
17 before atmospheric gasses, we're talking that  
18 five inert, right, essential --

19 PARTICIPANT: Carbon dioxide.

20 MR. FELDMAN: Right. We're not --  
21 we're not talking about nitrogen, I guess, and  
22 is it the intent that nitrogen be one of those

1 so-called inerts? So, I don't know --

2 CHAIRPERSON GIACOMINI: Inert has  
3 a specific chemical definition of which when  
4 you look at the periodic table it's the ones  
5 on the--

6 MR. FELDMAN: That's right and it  
7 doesn't --

8 CHAIRPERSON GIACOMINI: Right.  
9 So, unless they -- if they want to deviate  
10 from that, they need to be very specific.

11 Bonnie Wideman, Garth Kahl on  
12 deck, Stephen Pederson in the hole.

13 MS. WIDEMAN: Hello. My name is  
14 Bonnie Wideman and I'm the Director of MOSA,  
15 Midwest Organic Services Association in  
16 Wisconsin. We certify over 1,300 farms and  
17 over 600 of them are livestock operations.

18 So, we've submitted comments on  
19 all handling and other crop and livestock  
20 issues. But I want to address animal welfare.

21 The background for animal welfare  
22 in the November recommendation says that

1 livestock committee members arrived at the  
2 conclusion that current livestock regulation  
3 lacks specificity with the potential for  
4 creating confusion between producers,  
5 inspectors and certifiers.

6 Further, it was considered that  
7 the precise language had created unintended  
8 production practices which restricted the  
9 welfare of animals to a considerable degree.

10 Our concern here is that in  
11 striving for specificity with animal welfare,  
12 we will be embarking on a journey similar to  
13 the Pasture odyssey.

14 If you want to take that second  
15 sentence and put in Pasture for animal  
16 welfare, this is what you get. Further, it  
17 was considered that the imprecise language had  
18 created unintended production practices which  
19 restricted the access to pasture for ruminant  
20 animals.

21 And we do not feel that there is  
22 that much now that is of question. And I

1 think that we have to note that the emperor is  
2 wearing no clothes and admit that what we're  
3 looking at is poultry issues. Those are the  
4 ones where there are unintended production  
5 practices.

6 Unless you think that I just want  
7 to nay-say everything that's going on, I have  
8 three proposals that I would like to start  
9 with.

10 And the first one in regard to  
11 poultry is that it be up to the NOP to bring  
12 clarification to organic poultry production.  
13 Because in their putting out of the NOP  
14 program handbook, this is a proper time to do  
15 this because most certifiers are not allowing  
16 porches for poultry. Most of us are requiring  
17 indoor and outdoor space that is similar to  
18 the ACA poultry working groups proposal. And  
19 I'd like to see the NOP take this up.

20 And then my second proposal is  
21 that the livestock committee go back to the  
22 livestock rule as it is now with the pasture

1 changes and create another standard under 238  
2 that calls for animal well-being as a primary  
3 consideration in on-farm, in transport and  
4 slaughter handling of animals.

5 And thirdly, I think that we need  
6 to recognize that there are many resources for  
7 animal welfare. And similar to the way the  
8 pasture trainings, preferred producers and  
9 certifiers to pasture guidance materials, I  
10 would like to see producers, certifiers and  
11 inspectors be referred to my favorite is  
12 Humane Foreign Animal Care Guidelines as best  
13 practices.

14 And now I think I should explain  
15 some of the reasons we don't want to get too  
16 specific.

17 One of the things in the November  
18 recommendation there were -- I think there  
19 were five alteration practices that were  
20 prohibited. And the issue I have with that is  
21 that most of them are not allowed now,  
22 especially tail docking. Some of us have

1 never heard of mulesing of sheep. In fact,  
2 now I've put on my farmer hat because I have  
3 35 years experience in sheep handling.

4 And as far as space requirements,  
5 the Canadian requirement calls for 16.1 square  
6 feet per head, per sheep plus 2.5 square feet  
7 per lamb.

8 In the standard in the industry  
9 for lambing jugs, you know, those are where  
10 you put the sheep and the lambs if you are  
11 lambing inside is a four foot square pen which  
12 is 16 square feet. That is one of the reasons  
13 I respect the Humane Animal Care Standards is  
14 that that sort of thing is recognized in here.

15 But also as far as specificity, if  
16 you're going to go all the way, you're going  
17 to have to address everything in this book.

18 So, thank you.

19 Any questions?

20 CHAIRPERSON GIACOMINI: Any

21 questions.

22 Thank you.



1                   Garth Karl, Stephen Pederson,  
2 Carmela Beck.

3                   MR. KARL: Hi. My name is Garth  
4 Kahl. I'm the Latin American Program  
5 Coordinator with Oregon Tilth Certified  
6 Organic.

7                   Oregon Tilth is a nonprofit  
8 research and educational membership  
9 organization and we salute your service to the  
10 organic community and the considerable time  
11 and effort that each one of you has put in to  
12 -- the considerable time and effort each one  
13 of you contributes to this task.

14                  As you know, we have already  
15 submitted brief written comments and at this  
16 time I'd like to highlight and summarize some  
17 of those comments in brief.

18                  On the issue of production  
19 standards for terrestrial plants, Oregon Tilth  
20 supports the recommendation of the committee,  
21 including the prohibition on hydro and  
22 aeroponics. We are also pleased that the

1 definition is harmonious with that of the  
2 Canadian organic regime.

3 We would also comment that we  
4 overlooked the issue of sprouts and we would  
5 ask that the committee do take that into  
6 consideration as Robin did point out.

7 On stocking density charts.  
8 Oregon Tilth understands that many  
9 international regulations and certification  
10 bodies use them. But it is also under our  
11 understanding that equivalency agreements  
12 established with Canada and others recognize  
13 current practices for NOP producers to be  
14 acceptable and similar.

15 To verify this, the NOP requested  
16 that ACA report stocking densities. It was  
17 further understood that these numbers would  
18 then be reported to the NOP for analysis and  
19 later be used to demonstrate to foreign  
20 counterparts the validity of that equivalency.

21 Oregon Tilth request that ACAs  
22 and producers be given ample time,

1 specifically one to two years to record such  
2 data and report their findings to NOP before  
3 any additional action is taken. In other  
4 words, please don't fix it until we know if  
5 it's broken or not.

6 Particularly at a time when  
7 growers are already having to adapt to the new  
8 pasture regulations. This is an unnecessary  
9 and an added burden for them to jump through.

10 We support the relisting of  
11 tetracycline as well as materials on 601  
12 through 603 that are due to set in the next  
13 two years. We also agree that ferric  
14 phosphate should be relisted. Producers  
15 needs, depend on and deserve a stable  
16 regulatory environment. We do not believe  
17 that synthetic materials are overused or  
18 abused.

19 For synthetic methionine, we  
20 support the recommendation in part because of  
21 the spirit of collaboration that went into it  
22 and because methionine is such an important

1 component for a nutritional requirement in  
2 birds.

3 We understand that many members of  
4 the committee, industry and the general public  
5 feel organic culture production should move  
6 away from the use of synthetic methionine.  
7 However, with have proven alternatives already  
8 we feel synthetic methionine is necessary.

9 If the industry does make strides  
10 to move away from this material, Oregon Tilth  
11 requests an ample time be given for production  
12 systems to trial other management practices,  
13 feed sources, breeds, etcetera.

14 On the evaluation and individual  
15 listing of inert ingredients, OTCO supports  
16 the recommendation in general but urges that  
17 the period to submit currently allowed  
18 synthetics for review be extended to one year.

19 We can envision many  
20 manufacturers, particularly those overseas who  
21 would not find out about the issue until after  
22 one or more growers had brought it to their

1 attention. In addition, if the rule is  
2 implemented, we would ask the NOP to make a  
3 significant wide-reaching effort to inform  
4 growers, processors and the industry in  
5 general and that effort be similar to what  
6 we're seeing with the pasture rule.

7 OTCO would also like the committee  
8 to consider putting forth recommendations and  
9 guidance for ACAs and material review bodies  
10 that allows them to continue to review  
11 materials in the interim. And we would also  
12 second Zea's comments regarding the --  
13 regarding employing OMRI or the EPA to do that  
14 task.

15 Before closing I'd briefly like to  
16 touch on the issue of organic apiculture.  
17 OCTO strongly urges that the NOSB and NOP  
18 prioritize the consideration rapid and  
19 wholesale adoption of the 2009 Organic  
20 Apiculture Guidance document prepared by the  
21 ACA.

22 While NOSB did draft an apiculture

1 standard in 2001, we all know that the NOP did  
2 knock on it. In the intervening years, EU and  
3 now Canadian standards have become the de  
4 facto world standard, particularly, in the  
5 global south where most of the world's organic  
6 honey is produced.

7 The ACA standard was drafted with  
8 an eye for commonization with both the EU and  
9 COR standard. We feel the ACA standard would  
10 not only assure organic integrity, but would  
11 also create a workable standard that producers  
12 could live and pride with.

13 We would also stress that a  
14 crucial part of the adoption of any organic  
15 honey standard must also be the addition to  
16 the National List of a number of synthetic  
17 materials currently used internationally in  
18 organic apiculture. Specifically, time off  
19 formic acid and oxalic acid if the latter  
20 gains EPA approval for bees.

21 Again, thank you for your time,  
22 efforts and dedication. And I'll take any

1 questions.

2 CHAIRPERSON GIACOMINI: Questions?

3 Thank you.

4 MR. KARL: Thank you.

5 CHAIRPERSON GIACOMINI: David

6 Pederson, Carmela Beck, Brian McEvoy.

7 No Stephen Pederson?

8 Carmela Beck. Brian McEvoy,

9 Edward Gildea.

10 MS. BECK: Good afternoon. My

11 name is Carmela Beck and I work at the

12 Driscoll Strawberry Associates. I'm the

13 Organic Program Supervisor.

14 Driscoll's is a distribution or

15 conventional and organic strawberries,

16 blackberries, blueberries and raspberries.

17 We work with upwards of 45 plus

18 organic growers and on behalf of our growers

19 we're here today to request that ferric

20 phosphate continues to be relisted on the

21 National List.

22 Ferric phosphate is used in the

1 snail bait that's in the life of our growers.  
2 Currently it's the best tool that they have  
3 right now for snail bait and we hope to be  
4 able to have it in the future in order to  
5 manage our buffer zone.

6 That's my comments.

7 Thank you.

8 Any questions?

9 CHAIRPERSON GIACOMINI: Questions?

10 Thank you.

11 Brian McEvoy, Edward Gildea, Tim  
12 Stemwedel. Tim Stemwedel.

13 MR. McEVOY: Brian McEvoy,  
14 Driscoll Strawberry Associates.

15 I want to express appreciation to  
16 the National Organic Program staff for their  
17 presentation on the corn liquor issue. I  
18 think that the issue is well phrased and I  
19 think that this body can deal with the  
20 determination that's going to come out of  
21 that. And so I look forward to the result of  
22 your review.



1           I do think that liquid fertilizers  
2           are consistent with organic production  
3           practices and methods and hope that the focus  
4           on review of corn liquor is just that. The  
5           review of corn liquor and not the review of  
6           all liquid fertilizers.

7           And that's the end of my comment  
8           on corn liquor and I wanted to go back to a  
9           comment that you made, Joe, earlier about  
10          mating pheromone disruption. And I wanted to  
11          point out that one of the things about being  
12          in California is that you are very close to  
13          the light brown apple moth quarantine area.

14          And the Light brown apple moth  
15          quarantine essentially means that any producer  
16          that is found with any evidence of light brown  
17          apple moth, whether it's a pupa or the actual  
18          moth itself or the worm, the lepidoptera, that  
19          producer can end up not being able to ship.  
20          And that has happened to Driscoll's producers.  
21          It's happened to other producers in Salinas,  
22          Swansonville and it could be happening up in

1 the Sonoma and northern San Francisco area.

2 This year AFIS, USDA AFIS has  
3 distributed mating pheromone twist ties for  
4 the disruption of the light brown apple moth  
5 mating process and they've distributed those  
6 twist ties to all growers, conventional and  
7 organic, in the light brown apple moth  
8 quarantine to help growers limit the light  
9 brown apple moth mating process and thus  
10 reduce hopefully how many pesticides organic  
11 and conventional we have to spray to try to  
12 control the pest. Because again, it's not  
13 about control. It's about eradication. We  
14 cannot have one.

15 So, I just wanted to go back and  
16 point out, Joe, that mating pheromone  
17 disruption we have found those twist ties to  
18 this point to be extremely effective. When we  
19 have a mating pheromone trap in our field and  
20 we have the mating pheromone disruption twist  
21 ties around it, the moths cannot find the  
22 trap. And it's a huge issue for us here in

1 California and it's a huge part of our  
2 program.

3 So, that's it. Thank you.

4 CHAIRPERSON GIACOMINI: Questions?

5 Thank you.

6 Edward Gildea, Tim Stemwedel and  
7 Kyd Brenner.

8 MR. GILDEA: Good afternoon.

9 My name is Edward Gildea. Thank  
10 you for taking the opportunity to let me speak  
11 today.

12 This is my first NOSB meeting and  
13 I have to say I'm very impressed with the  
14 amount of work and time and energy that you've  
15 put into making decisions.

16 I'm the President of a company  
17 called Converted Organics, Inc. I'm here  
18 today to provide input concerning your  
19 deliberations with respect to corn steep  
20 liquor.

21 We submitted written comments on  
22 February 10th to Deputy Administrator McEvoy.

1 I recommend those comments to you as they  
2 contain a great deal more information that I  
3 saw in the recent TAC Report on corn steep  
4 liquor.

5           Converted Organics is a publicly  
6 held company. We have shares traded on NASDAQ  
7 under the symbol COIN. Our main line of  
8 business is to manufacture, distribute and  
9 sell organic fertilizers that we manufacture  
10 by recycling food waste.

11           The recycled food waste using a  
12 proprietary aerobic microbial digestion  
13 process. Our headquarters is in Boston,  
14 Massachusetts. We operate two recycling  
15 manufacturing facilities, one in Woodbridge,  
16 New Jersey, and one in Gonzales, California.

17           We employ about 46 people and in  
18 2009 we generated sales of about \$2.6 million.

19           Our products are sold in the  
20 agricultural market and lawn and turf market  
21 and in retail stores such as Home Depot, Whole  
22 Foods and WalMart.

1           The organic producers both solid  
2           and liquid fertilizers all of which are  
3           produced by recycling some form of food waste  
4           and one of the food waste products that we  
5           recycle is corn steep liquor.

6           We use corn steep liquor in a  
7           product -- when we use corn steep liquor in a  
8           product we always process it through the  
9           microbial digesting process. We don't  
10          advocate direct application onto land and we  
11          never use prohibitive substances in connection  
12          with our manufacturing process. But we do  
13          digest corn steep liquor in order to make our  
14          product.

15          Corn steep liquor is a food waste  
16          containing an insignificant amount of  
17          processing aid, sulfur dioxide or SO<sub>2</sub>. Our  
18          data indicates that a typical amount of SO<sub>2</sub> in  
19          raw corn steep liquor at our facility is about  
20          one-tenth of one percent and that the  
21          percentage drops to seven one hundredths of a  
22          percent in our final liquid fertilizer

1 product.

2 Food waste from conventional  
3 tomato processing facilities that use  
4 potassium hydroxide to remove skins is  
5 permitted to be used in a composting facility.  
6 Potassium hydroxide is a processing aid. It's  
7 not allowed in organic processing for this  
8 use. It has residues in significant amount of  
9 the waste and the food waste from these  
10 facilities may be used as feed stock from  
11 compost for organic production.

12 The question is. How does corn  
13 steep liquor differ?

14 If the corn set million process is  
15 determined to be synthetic due to the use of  
16 SO<sub>2</sub>, then all the products resulting from this  
17 process including corn starch and corn gluten  
18 which currently are allowed in organic  
19 agricultural nonsynthetic materials would have  
20 to be considered a synthetic because these  
21 products with the same origin and go through  
22 the same process as does corn steep liquor.

1                   Although I don't believe that the  
2                   corn set milling process creates synthetic  
3                   materials, I would expect that the NOSB and  
4                   the NOP would apply the same decision  
5                   uniformly to corn steep liquor, corn gluten  
6                   and corn starch.

7                   Compost, whether it's made on a  
8                   farm or purchased for use has been used by  
9                   organic farmers as one of their tools to go to  
10                  build soil kilt and provide nutrients for  
11                  their crops. Reducing the availability of  
12                  good quality compost and fertilizer for the  
13                  available feed stock for creating those  
14                  products would increase the challenges of  
15                  organic farming.

16                  Corn steep liquor should continue  
17                  to use this feed stock for compost and  
18                  fertilizer that is used in organic production  
19                  without the necessity of petitioning for its  
20                  use as a synthetic material.

21                  Thank you. I made it as quickly  
22                  as I could since you must be tired.

1 CHAIRPERSON GIACOMINI: Questions?

2 Joe?

3 MR. SMILLIE: You've had a lot of  
4 experience. What did you -- what particular  
5 issues with the TAC that we were provided with  
6 from the program would you take issue with?  
7 Was it simply too simplistic or was it  
8 inaccurate?

9 MR. GILDEA: Well, it --  
10 carefully, there are so many people listening.

11 MR. SMILLIE: Officially recorded  
12 I might add, you know. What you have said  
13 here will be held against you.

14 MR. GILDEA: My official -- my  
15 official position would be that it looked very  
16 much like it had been copied from a previous  
17 document issued by another agency. It didn't  
18 look as though it contained any independent  
19 thoughts on the evaluation of the subject  
20 raised in the document.

21 I think if you look at the  
22 submission we gave you, you'll find that



1       there's a lot of data and a lot of information  
2       that was not included in that TAC report.

3                     Yes, ma'am?

4                     CHAIRPERSON GIACOMINI: Tina.

5                     MS. ELLOR: Yes. The crops  
6       committee came to pretty much the same  
7       conclusion and we talked about that yesterday  
8       with the program. So, we hope to address some  
9       of those extra questions as we, you know,  
10      continue to deliberate on the corn steep  
11      liquor question.

12                    CHAIRPERSON GIACOMINI: Further  
13      questions?

14                    MR. GILDEA: Thank you.

15                    CHAIRPERSON GIACOMINI: Thank you.

16                    Next up Tim Stemwedel, Kyd  
17      Brenner, Lindsay Fernandez-Salvador.

18                    MR. STEMWEDEL: I'm Tim Stemwedel.  
19      I'm the Founder, Owner and President of  
20      California Organic Fertilizers.

21                    I've been in business  
22      manufacturing organic fertilizer products for

1 20 years.

2 Several topics I wanted to address  
3 today which are waste streams being used as  
4 crop inputs. Sunset review of liquid fish and  
5 corn steep liquor.

6 Regarding waste streams, my  
7 research has shown that these materials are  
8 not made with the intent to be used in organic  
9 crop production. And as such, there's no  
10 concerns made relative to the organic  
11 materials in the production process.

12 Included in this category is corn  
13 steep liquor, concentrator separator by-  
14 product or what's known as CSB, and lysine by-  
15 products.

16 A number of these have been banned  
17 and others are under review. I believe that  
18 it's bad for organics to be dependent upon  
19 waste streams. If let's say the product that  
20 they're making that -- the commercial product  
21 that they're making is no longer needed all of  
22 a sudden we no longer have a fertilizer

1 product.

2           Regarding the sunset review of  
3 liquid fish, first, the fish with phosphoric  
4 and sulfuric acid is a formulated product and  
5 doesn't really meet the regulatory  
6 requirements for inclusion on the National  
7 List. It's two different ingredients put  
8 together. Each ingredient should be  
9 considered separately by petition.

10           The use of phosphoric and sulfuric  
11 acid are not necessarily -- are really not  
12 necessary as there are alternatives available  
13 such as citric and acidic acid.

14           And I agree with Zea that the  
15 strong acids that are used in these create a  
16 chemical reaction and they actually change the  
17 material. They degrade the acid hydrolysis of  
18 the proteins.

19           Finally, I've got some comments on  
20 corn steep liquor. I've already posted  
21 comments at the regulations.gov site. These  
22 are in addition to that.

1                   CSL is an industrial waste. It's  
2 a by-product of the manufacturing of corn  
3 starch based cardboard glue. And there's  
4 thousands of tons of this stuff made and  
5 believe me it's not all going into little  
6 boxes in people's pantries. It's a good  
7 product.

8                   It's an industrial material, not  
9 an agricultural product.

10                  There are also alternatives,  
11 alternate fertilizers available that could be  
12 used in place. So, it's not really necessary  
13 as a fertilizer.

14                  The addition of SO<sub>2</sub> should make  
15 CSL formulate product as well because it's two  
16 ingredients together. So, each ingredient  
17 should be considered separately. You really  
18 should be looking at the use of SO<sub>2</sub> by itself  
19 in the production of corn starch.

20                  Additionally, we've looked  
21 extensively at the manufacturing process but  
22 really not at the shipping and handling of

1 this materials. The CSL is very biologically  
2 active and it ferments very easily. This is  
3 such the reason for adding the SO2 to begin  
4 with.

5 CSL needs to be stabilized in  
6 order to ship or store it for any length of  
7 time. Due to the fermentation issues, it's  
8 not stored for more than a few days at the  
9 production site. My research has discovered  
10 that CSL is usually stabilized to stop  
11 fermentation using sodium bisulfide.

12 So, in conclusion on the CSL, I  
13 would like to support OMRI's position that it  
14 is a synthetic material.

15 I'm also against the use of using  
16 the food process rules for crop inputs. And  
17 I ask the NOSB to be cautious in making  
18 recommendations that reduce the value of the  
19 organic brand by allowing organics to converge  
20 with conventional agriculture.

21 And I would as well also ask that  
22 the EPA list three and four ingredients be

1 considered separately, each by petition.

2 Thank you for allowing me to  
3 speak.

4 CHAIRPERSON GIACOMINI: Question?  
5 Jeff.

6 MR. MOYER: To follow up on your  
7 last comment. You just said that you support  
8 the inerts being listed -- you're talking  
9 about each ingredient individually by petition  
10 to this board? Is that what you're saying?

11 MR. STEMWEDEL: Yes.

12 MR. MOYER: Thank you.

13 CHAIRPERSON GIACOMINI: Further  
14 questions?

15 Thank you.

16 Kyd Brenner, Lindsay Fernandez-  
17 Salvador.

18 Mr. Brenner in. Lindsay  
19 Fernandez-Salvador, Bob Durst on deck.

20 Valerie, is Mr. Durst listed  
21 twice?

22 MS. FRANCES: Representing two

1 different organizations. Yes.

2 MS. FERNANDEZ-SALVADOR: Good  
3 afternoon. My name is Lindsay Fernandez-  
4 Salvador. I'm the Technical Director at OMRI.

5 OMRI is a nonprofit organization.  
6 Our mission is to provide professional,  
7 independent and transparent review of  
8 materials and processes to determine their  
9 suitability to producing processing and  
10 handling organic food and fiber.

11 I want to start today by  
12 commenting on corn steep liquor. We would  
13 like to discuss a little bit about how we  
14 arrived at the synthetic determination or  
15 classification of corn steep liquor.

16 When OMRI comes across a material  
17 that's particularly complex such as corn steep  
18 liquor, we have a long review process that we  
19 take it through what we call a review panel.  
20 And when our review panel can't make that  
21 determination, we take it to an advisory  
22 council.

1                   Our advisory council is made of a  
2 wide variety of experts in their field, not  
3 unlike the NOSB. And we prepare materials for  
4 them that they can review and make a  
5 determination or both. And the majority vote  
6 is how we go.

7                   So, we have this process so that  
8 no one person had the complete power over the  
9 decision of a synthetic or nonsynthetic  
10 status.

11                   The first time they voted they  
12 were provided with scientific literature, a  
13 copy of the NOSB guidance document that you --  
14 that you recommended in 2006 with information  
15 from the manufacturer wanting to use this  
16 material. They voted 8 to 2 that it was  
17 synthetic.

18                   Then we received more information  
19 substantiating the idea that it was  
20 nonsynthetic primarily that lactic acid was  
21 the driver of the protein cleavage. And so we  
22 provided the ACA again with this information



1 with the same information that the -- that the  
2 manufacturer used to support the determination  
3 of nonsynthetic or to support his argument.  
4 And, again, they voted 7 to 3 that it was  
5 synthetic.

6 So, I do believe that OMRI  
7 fulfilled our mission by being professional,  
8 independent and transparent in this review of  
9 this material.

10 But given that we of course  
11 appreciate the NOP's guidance in lieu of an  
12 official decision from the NOSB and we are  
13 assured that the NOSB will take into account  
14 the information that they've been provided on  
15 corn steep liquor and make a fair and informed  
16 decision on that.

17 I would also take a moment to  
18 mention the minorities' opinion as well  
19 because there was a good stream of, while this  
20 is synthetic, it's a very useful product. And  
21 they would like to see it listed on the  
22 National List. And so I quote.

1 I think there are limitations on  
2 how far the definition of synthetics should be  
3 extended. When the law was written the  
4 primary materials that were being rejected by  
5 organic growers was synthetic fertilizers and  
6 pest controls that were causing large-scale  
7 and long-term environmental damage. And  
8 synthetic materials such as artificial  
9 coloring that was adulterating our food  
10 supplies to the point of causing diseases in  
11 healthy people.

12 And so that was the  
13 characterization of many comments, both in the  
14 synthetic vote and the nonsynthetic.

15 So, with that I'd like to move on  
16 with the classification of materials.

17 We'd like to comment on question  
18 number 2 of the guidance material.

19 While we support this question of  
20 removing a material from classification when  
21 certified organic in processed foods, it  
22 causes a problem for OMRI when we have to look

1 at an ingredient that might be -- could be  
2 certified organic but isn't certified organic  
3 because it's used in crop or livestock inputs.  
4 So, if that was the intent of that question to  
5 remove those types of materials, we'd like you  
6 to rethink that if that really was the intent  
7 and if so how the industry might deal with  
8 that.

9 We also appreciate the burning of  
10 the midnight oil with the extra vote last  
11 night and we'd like to take another moment to  
12 make comments on that at a later date.

13 And we strongly support the  
14 continuing work on significant and  
15 insignificant levels. This is a vital piece  
16 of information. We prohibit on a regular  
17 basis whether or not a synthetic is left over  
18 in the formulation. And anytime that we can  
19 point to a regulation, it helps our case at  
20 OMRI, our staff but it also helps the  
21 manufacturers that work towards a threshold  
22 when making new products.

1 Thank you.

2 CHAIRPERSON GIACOMINI: Questions?

3 Katrina.

4 MS. HEINZE: Thank you for your  
5 comments on classification.

6 I would encourage you as the joint  
7 committee continues to work on that guidance  
8 document if you could send us any facts you  
9 have on significant and insignificant that  
10 might inform our deliberations. We would love  
11 to get those. You can send them to Valerie  
12 and she'll forward them on to us.

13 MS. FERNANDEZ-SALVADOR: I will do  
14 my best.

15 MS. HEINZE: Thank you very much.

16 CHAIRPERSON GIACOMINI: Jay.

17 MR. FELDMAN: Thank you for your  
18 comments.

19 you also commented on ferric  
20 phosphate, right?

21 MS. FERNANDEZ-SALVADOR: Correct.

22 In my written comments. Yes.

1                   MR. FELDMAN: In your written  
2                   comments. And you say OMRI is not taking a  
3                   position on -- on -- on the vote or the  
4                   pending vote on the sunset.

5                   MS. FERNANDEZ-SALVADOR: On the --  
6                   we're not taking a position on the petition to  
7                   delist.

8                   MR. FELDMAN: Right.

9                   Now, is that unusual? Is that  
10                  something you don't do? If you were requested  
11                  to take a position, would you or it doesn't  
12                  work that way?

13                  MS. FERNANDEZ-SALVADOR: No. We  
14                  tend not to take a position on the suitability  
15                  or the allowance of materials.

16                  MR. FELDMAN: Right. But in terms  
17                  of compliance with the standards of the final  
18                  rules, you would -- you would make a ruling on  
19                  that? No?

20                  MS. FERNANDEZ-SALVADOR: Currently  
21                  ferric phosphates as formulated in a pesticide  
22                  -- in a pesticide formulation is compliant wit

1 the regulations both EPA and NOP.

2 MR. FELDMAN: Okay. Does OMRI  
3 look at whether the essentiality of a product  
4 and whether there have been alternatives  
5 developed for a particular target pest?

6 MS. FERNANDEZ-SALVADOR: No.

7 CHAIRPERSON GIACOMINI: Question?

8 Joe.

9 MR. SMILLIE: Thank you.

10 This is not just for you but I  
11 like OMRI's position on the industry as to  
12 this question. From reading the written  
13 submissions on corn steep liquor, I've been  
14 led to believe in a couple of cases that there  
15 are two methodologies for corn steep liquor.  
16 One called the old traditional method and the  
17 other the new method. And that these  
18 methodologies should be looked at separately.

19 When you -- when your panels  
20 looked at it, is that the way -- did you look  
21 at both methods?

22 MS. FERNANDEZ-SALVADOR: When we

1 look at the status of a material, we look at  
2 it primarily in the context of the actual  
3 ingredient that is wanting to be used in an  
4 OMRI listed product. So, in this case, it's  
5 the industrial corn steeping method, counter-  
6 current method.

7 I can't speak for the -- the old  
8 manufacturing process. But we would look and  
9 especially if there were other mechanisms  
10 through which something could be manufactured.  
11 For example, maltodextrin can be made both  
12 synthetically and nonsynthetically. So, if  
13 corn steep liquor came through again that was  
14 made perhaps through enzyme hydrolysis rather  
15 than sulphurous acid, we might consider that  
16 a nonsynthetic material.

17 CHAIRPERSON GIACOMINI: Any more  
18 questions?

19 Thank you.

20 Okay. Bob Durst is next.

21 Before you get started through,  
22 just for going back and checking where we

1 stand on our list.

2 Is there a speaker for the Corn  
3 Refiners of America here?

4 Okay.

5 And is Stephen Pederson here?

6 Okay. Then we have -- this is --  
7 do you want one ten minute or do you want two  
8 fives?

9 MR. DURST: Give it one ten but  
10 allow me a five because it's sort of separate  
11 stuff.

12 CHAIRPERSON GIACOMINI: Okay.

13 Then we have Dennis Macura and  
14 Paolo Mario Bonetti in the hole.

15 MR. DURST: Thanks.

16 First, Bob Durst from Simple  
17 Organic Solutions. I'm a consultant and on  
18 the corn steep liquor issue I'm addressing  
19 that for some of my clients.

20 Something that wasn't just  
21 mentioned from OMRI is that they've made this  
22 ruling about it being synthetic now, but for



1 many, many years, it was actually an approved  
2 product and listed with them and when the  
3 first approvals of those products were made,  
4 they were aware of the sulfur dioxide content  
5 and the process that was used in it and it was  
6 readdressed later on most recently here. And  
7 when they readdressed that they decided to  
8 rule it as synthetic. So, it has been used  
9 widely for a long time and approved by OMRI.  
10 So that's its historical status on it.

11 To address a little bit the  
12 chemistry of the process, and Lisa yesterday  
13 introduced that and I'll reiterate a little  
14 bit. That SO<sub>2</sub> is used primarily to prevent  
15 wild microbial action of the material while  
16 it's going through initial steeping. And that  
17 if the pH is involved in these conditions of  
18 extraction, there's really minimal breakdown  
19 of the chemical bonds in there and that most  
20 of the action and chemical breakdown is due to  
21 the lack of acid fermentation that's going on.

22 And if one looks at the entire

1 process there it might almost be a mute point  
2 because these products once you start with  
3 CSL, in order to make a liquid fertilizer it's  
4 going on to additional fermentations which are  
5 biological processes that are completely  
6 breaking down all the chemical nature of the  
7 things that are there regardless of anything  
8 that might have happened with SO<sub>2</sub> up front.  
9 Those proteins are being broken down by  
10 biological fermentation products subsequent in  
11 the operation there.

12 Just to expand on that a little  
13 bit, examples that Miles gave yesterday in his  
14 presentation regarding things like bifenthrin,  
15 residues in compost, where you've got a real  
16 nasty chemical in there on the input stream  
17 but through the composting process you got a  
18 breakdown of that and subsequently you've got  
19 a material that's perfectly acceptable for use  
20 as an input in organic agriculture.

21 And the case here is very similar.  
22 We see a cell. Edward made a point just a

1 moment ago with the sodium hydroxide and  
2 tomato waste product being used in the same  
3 way that you've got a complete breakdown of  
4 this material that is happening through a  
5 biological process at the end of this whole  
6 liquid composting process that's real  
7 different from using that as an ingredient.  
8 It's -- it's material that's in there. It's  
9 being used. It's being broken down by  
10 exceptional processes that it should be  
11 allowed as an acceptable ingredient then for  
12 agriculture.

13 So, actually that's just about all  
14 I have on the CSL.

15 CHAIRPERSON GIACOMINI: Any  
16 questions on the CSL?

17 Okay. Go ahead.

18 I think after your next comment we  
19 will take our next break. We are a few  
20 minutes -- should have a few minutes.  
21 Probably should have done it before you, but  
22 go ahead.

1 MR. DURST: There's only one or  
2 two more CSL things. You might want to finish  
3 that up before you move on to something.

4 CHAIRPERSON GIACOMINI: Oh, okay.

5 MR. DURST: Just as a suggestion.

6 So, my second area that I'm going  
7 to address here and I'm representing Whitmeyer  
8 MicroGen which is a pesticide manufacturer.  
9 Has to do with inerts in pesticide product.

10 And the August 2004 list is the  
11 last combination list that was published by  
12 EPA. And unfortunately what happened is they,  
13 you know, they dropped the ball as you folks  
14 all know in 2006, but they had been continuing  
15 to evaluate materials between 2004 and 2006  
16 when they dropped it.

17 And the recent guidance document  
18 that came out that said we're going to -- that  
19 you're going to use the 2004 list, but having  
20 acknowledged that some reviews continued after  
21 that point, and stating that there were half  
22 a dozen -- actually eight materials that were

1 removed from list 4 that the guidance document  
2 says are no longer going to be acceptable.

3 There's no acknowledgment that  
4 there were quite a number of materials that  
5 were reviewed and added to list 4 during that  
6 two-year period and because the 2004 list  
7 doesn't have those on them, nobody is allowed  
8 to use those. And it's really a travesty that  
9 those things -- people spent a lot of money to  
10 get those things listed in that interim period  
11 and now they've fallen through the cracks.

12 And I realize that the whole issue with EPA  
13 inerts is a big kerfuffle these days because  
14 it's been dropping the ball, but there should  
15 be some guidance document that says anything  
16 that was listed at any point in time with the  
17 EPA list, the additions of these handful of  
18 materials and the removal of these materials  
19 between 2004 and 2006 when they dropped the  
20 ball, ought to be allowed as inert pesticides.

21 CHAIRPERSON GIACOMINI: Any  
22 questions?

1                   Okay. So, you think we should do  
2 one more before we break? There's only one  
3 listed.

4                   There is only one listed.

5                   Dennis Macura.

6                   MR. MACURA: Thank you, Mr.  
7 Chairman. Members of the Board, ladies and  
8 gentlemen.

9                   Thank you for the opportunity to  
10 address this distinguished Board.

11                   My name is Dragon Macura. I go as  
12 Dennis as well. I represent a company called  
13 AgroThrive, Incorporated. AgroThrive, I  
14 believe was the company at the focus of  
15 attention with OMRI.

16                   When we first submitted our  
17 application for listing of our products with  
18 OMRI, we have submitted our application to  
19 Washington State and ASCO at the same time.  
20 They asked the same questions and approved our  
21 products within less than a month.

22                   OMRI took about two years, two and

1 a half. At the end of deciding that they were  
2 going to list it as -- not list it in their --  
3 their decision was that it was going to be  
4 synthetic. And that was made by their  
5 advisory council.

6 I asked for the information that  
7 was submitted to the advisory council and I  
8 received all the papers. There were seven in  
9 all. And none of them were peer reviewed  
10 published research papers. They were all  
11 discussion papers about the topic.

12 When I then went to do my  
13 literature search I found one field reviewed  
14 research paper by Disincogin 1996 which  
15 actually looked at this issue.

16 I believe I have submitted a copy  
17 of it with my written submission. If I have  
18 not, please let me know and I'll submit it to  
19 whoever has not received it.

20 I've taken some of the details of  
21 that research and I've also addressed some of  
22 the comments that OMRI had in their recent

1 newsletter publication talking about the  
2 issue.

3           The two points there that I would  
4 wish to make. One of them is to address the  
5 issue of 7 to 2 -- 7 to 3 or 7 to 2 voting of  
6 the OMRI advisory council. I believe that  
7 they -- the council members tried in earnest  
8 to make the correct decision. However, they  
9 did not have all the information to make a  
10 decision on.

11           The information being that the  
12 supposed reaction that is -- that was supposed  
13 to be happening is the reaction between sulfur  
14 dioxide that is used as a processing aid in up  
15 stream and steeping process creates a reaction  
16 with bisulfide bonds in protein and therefore  
17 renders a material synthetic.

18           While my application was for the  
19 listing of AgroThrive fermented compost -- a  
20 liquid composted product. It was not for  
21 listing of -- of an ingredient in steep  
22 liquor.



1                   And as a result, the process  
2                   that's -- that follows the formulation of our  
3                   materials of the composting process was not  
4                   even considered in the deliberation. The  
5                   reaction itself is supposed to be going on at  
6                   pH conditions that were not present in the  
7                   counter current production system.

8                   If you look at my submission I've  
9                   gone to the manufacturer and I've taken  
10                  detailed notes and diagrams on -- on how the  
11                  material is actually produced, not what the  
12                  literature says about it because there's a  
13                  fair amount of discussion literature of  
14                  different types of processes.

15                  If you take a look at those -- the  
16                  submission you will see that the fresh corn in  
17                  which the supposed reaction is possible to  
18                  take place is added to the oldest steep  
19                  liquor. In other words to a pH at which this  
20                  reaction is less than one percent chance of  
21                  happening.

22                  The highest concentration of SO<sub>2</sub>

1 is added to the oldest corn one and a half  
2 hours before it's taken out of the process and  
3 ground. So, chance of that happening or that  
4 reaction actually taking place is very minimal  
5 to none.

6 In addition, while this is  
7 happening there is a very, very vigorous  
8 lactic acid fermentation taking place. Lactic  
9 acid material are known to be pertilitic and  
10 they are -- they are very active at the -- at  
11 the onset when -- when the corn is added to  
12 the material.

13 And, finally, the -- the corn  
14 steep liquor that we use in our product is a  
15 formulated material. I mean, it's part of the  
16 formulation. So, I was very -- very glad to  
17 see that NOP did an explanation on composting  
18 with bifenthrin and I think that it should be  
19 looked at in the same context as composting as  
20 a composting process.

21 CHAIRPERSON GIACOMINI: Thank you.

22 Questions?

1           Okay. Folks, we are -- we've been  
2           at this -- thank you, sir.

3           MR. MACURA: Thank you.

4           CHAIRPERSON GIACOMINI: We've been  
5           at this since 8:00 this morning. It's 3:00.  
6           We are hoping to be done by 5:00 and we're not  
7           half done.

8           So, we're going to take a break.  
9           When that clock hits 3:10 we're going to be --  
10          the next speaker is coming up. We'll start  
11          with the wine group and we may need a glass.

12          Paul Dolan, Paola Bonetti and  
13          Brian Fitzpatrick.

14          (Whereupon, the above-entitled  
15          matter went off the record at 2:59 p.m. and  
16          resumed at 3:11 p.m.)

17          CHAIRPERSON GIACOMINI: Could we  
18          please bring the meeting to order? Yes, we  
19          can. We have a quorum. We have eight. We're  
20          rockin' and rollin'.

21          MR. DOLAN: My name is Paul Dolan.  
22          I'm a farmer, biodynamic organic farmer and

1 wine grower, wine maker. I've been in the  
2 business for a number of years working for a  
3 small family business. I worked for a large  
4 corporation actually and I'm involved in small  
5 family business now. I'm excited that my sons  
6 have decided to become fifth generation  
7 farmers as well.

8 My awakening in this business came  
9 about 25 years ago. As a young wine maker I  
10 can remember being in vineyards tasting fruit  
11 trying to determine whether they were ready to  
12 harvest or not, tasting sauvignon blanc.  
13 Tasting the berry off the vine had all of the  
14 fruit and melon and fig characteristics I  
15 would expect for Sauvignon blanc.

16 And then just walking 10 feet over  
17 to another row, tasting another berry that was  
18 flat and insipid. I didn't get that and I  
19 didn't understand it. I always had great  
20 hopes for that wine but each year I would end  
21 up being disappointed. That wine would go  
22 into our everyday table wine.

1                   Three years after we converted it  
2                   to organic those same grapes started going  
3                   into our top level Sauvignon blanc. Clearly  
4                   for me there was a difference. I could make  
5                   better wine growing grapes organically.

6                   I also realized on some level I  
7                   was probably poisoning the earth by using the  
8                   chemicals that I was using and killing the  
9                   microbial life from the soil. For me  
10                  everything shifted and I started to become  
11                  very passionate about organic. So passionate  
12                  that my personal mantra is create a shift in  
13                  sustainability on the planet through business  
14                  leadership.

15                  I think organics with its  
16                  orientation to systems thinking actually  
17                  starts to give us some access there. I've been  
18                  involved in converting many, many acres over  
19                  to organic, probably over 2,500 acres myself,  
20                  and involved in leading the rest of the  
21                  industry as well.

22                  Now, 15 years ago I had to get

1 involved in order to make that happen because  
2 the NOP was going to go down the path of  
3 interpreting that wine could not be made --  
4 organic wines or the word organic couldn't be  
5 put on the label that used sulfites. We were  
6 able to create special category, "made with  
7 organically grown grapes."

8           Since then, or the reason I went  
9 back to do that is because I knew farmers  
10 would not grow organically if there wasn't a  
11 market. I knew wine makers would not easily  
12 make wines without sulfites because sulfites  
13 have been in the production of wine for  
14 thousands -- hundreds of years I should say.

15           Now, today there are 55 wineries  
16 that are using sulfites, 55 brands that are  
17 using sulfites in their wine production with  
18 the terminology "made with organically grown  
19 grapes." There are 15 with no sulfites added.

20           Things have changed in the last 15  
21 years now so that we are now the only wine-  
22 producing country in the world that does not

1 allow sulfites to be used for organic wines.

2 Canada just allowed that just recently.

3 We also are a country that has  
4 five categories for the terminology organic if  
5 you can imagine that. So I have a simple  
6 request. My request is that we go to one  
7 category, organic wine, with two  
8 subcategories. We allow for products with no  
9 sulfites added but really organic wines really  
10 are just wine, wine that we use sulfites.

11 The simple benefits for that when  
12 we get this all cleared up on a global scale,  
13 I think that's really important for the growth  
14 and development of the business but also for  
15 the growth and development of organic. It  
16 also clears up with the trade. We will always  
17 have the confusion.

18 We created the confusion, if you  
19 will, the organic industry, with the sulfite  
20 issue because it never was an issue until we  
21 started to go down the organic path. We'll  
22 still have to deal with that but we can reduce

1 the confusion for consumers by simply creating  
2 products that are 100 percent organic.

3 Now, I would also suggest that we  
4 eliminate the category of 70 percent. We  
5 don't need it in our industry. There is no  
6 benefit. There is nobody that's using it.  
7 It's just a temptation to create more  
8 confusion for us going forward.

9 It would be wonderful if we could  
10 create an interpretation that doesn't allow  
11 for the 70/30 ruling, nor do we need the other  
12 one which suggest that you can put organic  
13 ingredients on the back label. That's it.

14 CHAIRPERSON GIACOMINI: Questions?

15 MR. DOLAN: Oh, they always have  
16 questions for the wine guy.

17 MR. SMILLIE: We love your  
18 product.

19 MR. DOLAN: All right. We love  
20 it.

21 MR. SMILLIE: In the vein of the  
22 "made with" and, again, 70 percent is a "made



1 with" label which is the only label you are  
2 currently able to operate under so if we got  
3 rid of that, you wouldn't have anything at  
4 this point in time which I agree is ludicrous.  
5 What's your view and your industry's take on  
6 the interpretation that you can have different  
7 varieties of grapes as organic and nonorganic  
8 in the same meritage blend?

9 MR. DOLAN: Crazy. It's crazy.

10 MR. SMILLIE: Total nonsense.

11 MR. DOLAN: Nobody wants it. We  
12 don't want it. We're saying don't give that  
13 to us. We just as soon not have that and we  
14 just as soon just have 100 percent or 95  
15 percent.

16 MR. SMILLIE: You don't want to go  
17 a hundred either.

18 MR. DOLAN: You probably don't  
19 want to go to a hundred.

20 CHAIRPERSON GIACOMINI: Katrina.

21 MS. HEINZE: Have you submitted a  
22 petition to change the annotation for

1 sulfites?

2 MR. DOLAN: Yes. Paolo is going  
3 to speak to that next.

4 MS. HEINZE: Oh, fabulous.  
5 Thanks.

6 CHAIRPERSON GIACOMINI: Jon.

7 MR. FOSTER: When you -- forgive  
8 how odd this question sounds. When you add  
9 the sulfur compounds to wine do you consider  
10 wine to be synthetic at that point or a  
11 nonsynthetic product? I'm just asking.

12 MR. DOLAN: It's wine. Just wine.  
13 I've been involved in wine making for a long  
14 time. I'm the fourth generation. My great  
15 grandfather was the one that brought the  
16 technology of sulfites from France over to  
17 this country.

18 Actually he was an Italian but on  
19 a trip over there he discovered the use of it  
20 and he found that you could just stabilize  
21 wines and so for over 120 years now we've been  
22 using sulfites in the use of wine production

1 and it's just created stability. Absent  
2 sulfites, you know, the wines fall apart very  
3 quickly and then you lose the integrity of the  
4 product and that's not really what we want to  
5 do.

6 MR. FOSTER: So it's wine before  
7 and wine after.

8 MR. DOLAN: Thank you.

9 MR. FOSTER: Is that right?

10 MR. DOLAN: Thank you. Yes.

11 MR. FOSTER: Excellent.

12 CHAIRPERSON GIACOMINI: Those kind  
13 of questions are not allowable from a first-  
14 year member. I'm sorry. I can just imagine  
15 15 or 16 years ago this was probably a very  
16 contentious conversation and so hopefully you  
17 won't be going forward with it.

18 Anymore questions? Thank you.  
19 I'm on the wrong page. Whoever knows they are  
20 coming up knows they are coming up.

21 MR. BONETTI: Here's the petition.

22 CHAIRPERSON GIACOMINI: Brian

1 Fitzpatrick, Chris -- whoever is from ZD  
2 Wines.

3 MR. BONETTI: Here's the petition.  
4 I agree with everything that Paul said. My  
5 name is Paolo Bonetti. I'm president of  
6 Organic Vintners from Boulder, Colorado. My  
7 company has been in the organic wine industry  
8 since October of 2001 after the Boxer McCall  
9 amendment to allow the FDA to allow the use of  
10 sulfites in wine.

11 We are primarily an importer of  
12 organic wines and we also product domestic and  
13 imported wines with our own brand also called  
14 Organic Vintners which make up about 25  
15 percent of our business. All our wines are  
16 made from 100 percent organic grapes that  
17 comply with the NOP and contain no more than  
18 the permissible amount of sulfur dioxide which  
19 is 100 parts per million. By comparison  
20 conventional wines are allowed up to 350.

21 In addition to complying with the  
22 NOP alcoholic beverage labels are controlled

1 by the US Tax and Trade Bureau so it's my  
2 responsibility to help my foreign exporters  
3 comply with their regulations as well.

4 On October 8, 2009 our domestic  
5 certifier, CCOF, informed us that Organic  
6 Vintners brand would not longer be acceptable  
7 because the product is in the "made with"  
8 category. Up to that time CCOF and the TTB  
9 had approved 41 labels over an eight-year  
10 period. Upon this certification we were  
11 horrified, as you will be, by what we  
12 discovered.

13 We previously thought that all  
14 wine making and the organic claims were made  
15 from 100 percent organic grapes with sulfites  
16 or without sulfites because of the basic  
17 fundamental long-standing principle of organic  
18 agriculture to not have any organic and  
19 nonorganic form in the same ingredient.

20 We discovered this not to be true  
21 in wine. When the final regulations were  
22 passed, the language chosen for wine with

1 added sulfites was not subject to appear for  
2 public comment and these wines were restricted  
3 to the inferior claim of made with organic  
4 grapes which does not allow the use of the  
5 USDA organic seal and does not allow the  
6 product to be called organic wine.

7 Because made with organic  
8 ingredients requires only 70 percent organic  
9 agricultural products, we discovered that  
10 wines containing 30 percent nonorganic grapes  
11 were also permitted to make the same claim  
12 "made with organic grapes."

13 This horrifying fact was confirmed  
14 by an NOP and TTB joint publication issued  
15 last June called "Guidelines for Labeling Wine  
16 with Organic References." This document  
17 recommends a brand new label to the organic  
18 industry which is supposed to clarify the 30  
19 percent rule by making the claim "made with  
20 organic grapes and nonorganic grapes." Have  
21 you all seen this? If you haven't, I have  
22 extra copies.

1                   How is a consumer supposed to know  
2                   that "made with" is 100 percent organic  
3                   because it does not have the seal and it does  
4                   not have to say organic wine. Interestingly,  
5                   at the same time this document was issued last  
6                   June Canada announced its own organic program  
7                   the COR, Canadian Organic Regime. Canada was  
8                   well aware of the US rules on organic wine and  
9                   chose not to adopt them.

10                   In Canada organic wine without  
11                   sulfur dioxide is liable to be called organic  
12                   wine and may carry the COR seal. A month  
13                   later the US and Canada signed an historic  
14                   equivalency agreement on organic regulations.  
15                   We are also expecting the European Union to  
16                   pass its own organic regulations in June of  
17                   this year allowing the wines with added  
18                   sulfites to be labeled as organic and use the  
19                   seal.

20                   To take advantage of these foreign  
21                   regulations Organic Vintners recently exported  
22                   a California organic wine with added sulfites

1 with a Canadian organic seal on the principle  
2 display panel to a customer in England whose  
3 label was approved by CCOF for export only.

4 We submitted this shocking label  
5 you are looking at to the USDA accredited  
6 certifiers of Argentina, Italy, Switzerland  
7 and Germany and they all rejected it, as we  
8 suspected, stating that they could only allow  
9 an organic claim with the existence of  
10 nonorganic grapes.

11 This puts the NOP's made with  
12 organic grapes category at odds with new and  
13 existing international regulations. We think  
14 you and Canada are correct and believe the  
15 NOSB should not allow organic wine to contain  
16 nonorganic grapes and should amend the  
17 annotation for sulfur dioxide on the National  
18 List.

19 How much time do I have left? One  
20 minute Thank you.

21 An overwhelming majority of  
22 organic wine makers use sulfur dioxide to



1 stabilize a product dating back to 1487. They  
2 are all prohibited from using the USDA seal  
3 causing consumer confusion over the difference  
4 between organic wine and wine made with  
5 organic grapes.

6 This has inhibited the growth of  
7 our industry. We estimate that 2 percent of  
8 all wine sales in the US are organic wines  
9 while the organic food and beverage category  
10 enjoys a 3.5 percent market share.

11 The only symbol that gives  
12 consumers confidence, assurance, and trust and  
13 the legitimacy of organic integrity is the  
14 USDA seal. Thank you for coming up with it.  
15 Although the additional sulfur dioxide is  
16 permitted by an act of Congress, NOP would not  
17 allow over 99 percent of wine makers using 100  
18 percent organic grapes across the world to  
19 call it organic wine.

20 Therefore, for the benefit of the  
21 domestic and international organic wine  
22 industry and the promulgation of organic

1 agriculture in general, organic vintners and  
2 co-petitioners Paul Dolan and others have  
3 submitted an annotation to sulfur dioxide in  
4 Section 205.605(b) to allow wines with added  
5 sulfur dioxide to be labeled as organic  
6 instead of made with organic grapes. Thank  
7 you.

8 CHAIRPERSON GIACOMINI: Thank you.

9 MR. BONETTI: If anybody wants a  
10 copy, it's right here.

11 CHAIRPERSON GIACOMINI: I would.  
12 Anybody that wants one can take one.

13 Joe.

14 MR. SMILLIE: To follow up with  
15 the complications we're getting as we move  
16 into the era of equivalency clashing with the  
17 age of enforcement, you could contract a  
18 Canadian wine maker to certify a wine under  
19 the core and put the USDA seal on it.

20 MR. BONETTI: Right. We could but  
21 the label has to be approved by the TTB and  
22 they wouldn't.

1 MR. SMILLIE: Ah.

2 MR. BONETTI: Right?

3 MR. SMILLIE: The USDA would  
4 accept it but TTB --

5 MR. BONETTI: The USDA would  
6 accept it? You would accept a wine that says  
7 "organic wine from Canada" with a USDA seal  
8 that contained sulfites? I don't think so,  
9 Joe. It would be nice.

10 MR. SMILLIE: Well, let me ask the  
11 program. If there is an equivalency agreement  
12 and that's not part of the exclusions, if a  
13 Canadian wine maker in compliance with the  
14 core put a USDA seal on a Canadian wine, which  
15 noncompliance would they be charged with?

16  
17 MR. BONETTI: Excuse me. Are you  
18 directing the question to --

19 MR. SMILLIE: I'm asking the  
20 program.

21 MR. BONETTI: Oh, okay.

22 MR. McEVOY: First of all, I think

1       you have a lot of good points. The National  
2       List does say that sulfites are only allowed  
3       to be used and made with organic products so  
4       in order for that to change there has to be a  
5       petition. You are following the right  
6       procedure petitioning the Board for a change  
7       to the annotation.

8                   MR. BONETTI: Thank you.

9                   MR. McEVOY: So that's great.

10       I'll let Shannon answer the question in terms  
11       of the nonorganic components because Shannon  
12       is really on top of the TTB question.

13                   In terms of the equivalency  
14       arrangement, the equivalency arrangement  
15       doesn't mean that you -- you still have to  
16       follow US labeling laws for products so it's  
17       an equivalency of organic products but you  
18       still have to follow the US labeling laws.  
19       TTB has certain labeling requirements and you  
20       have to meet those in order to sell an organic  
21       product within the US

22                   MR. BONETTI: So the answer is no.

1 MR. McEVOY: At this time.

2 MR. BONETTI: Otherwise, the other  
3 thought we had when I heard the same thing  
4 George has said is why not export a wine to  
5 Canada with a USDA seal on it and then import  
6 it back into America if the answer was yes.  
7 Right?

8 MR. McEVOY: It still has to  
9 comply with the US labeling.

10 MR. BONETTI: Right. Of course.

11 MR. McEVOY: It's an area that  
12 needs some work.

13 MR. BONETTI: Any other questions?  
14 Thank you.

15 CHAIRPERSON GIACOMINI: Shannon,  
16 did you have anything to add on this since  
17 they made you walk all that way?

18 MR. SMILLIE: Have we received the  
19 petition yet?

20 CHAIRPERSON GIACOMINI: We just  
21 did.

22 PARTICIPANT: No.

1                   CHAIRPERSON GIACOMINI: No. We  
2 haven't received it. No, we have not received  
3 it.

4                   MS. HEINZE: The chair has not  
5 received it from the program. While you all  
6 have it in front of you, we have not  
7 officially received it.

8                   CHAIRPERSON GIACOMINI: Pay no  
9 attention to the man behind the screen. Okay.

10                  MR. McEVOY: Do you want  
11 clarification on the not organic, organic wine  
12 component?

13                  CHAIRPERSON GIACOMINI: Okay.

14                  MR. McEVOY: We'll try.

15                  CHAIRPERSON GIACOMINI: Shannon.

16                  MS. NALLY: Let's see. Last  
17 summer in June of 2009 we did issue a  
18 clarification to add essentially a new  
19 labeling category that is only specific to  
20 wines that would allow the "made with" claim  
21 to state "made with organic and nonorganic  
22 grapes" because we were informed that what was

1       happening is that some wines that had the  
2       label "made with organically grown grapes" had  
3       70 percent organic grapes but within that 30  
4       percent had nonorganic grapes.

5               The implication of made with  
6       organically grown grapes claim on the label to  
7       a consumer imply that the wine contains only  
8       organic grapes. Therefore, we allow grapes of  
9       different varieties, not the same variety, to  
10      be organic.

11              We allow organic and nonorganic  
12      grapes of different varieties but the organic  
13      grapes still have to be present at the 70  
14      percent level and the nonorganic grapes can be  
15      within the 30 percent but they have to be a  
16      different variety than the organic grapes.

17              CHAIRPERSON GIACOMINI: I  
18      understand that.

19              Brian, then Chris from ZD and  
20      Patrick Riggs.

21              MR. FITZPATRICK: Hi. I'm Brian  
22      Fitzpatrick of Fitzpatrick Winery and Lodge.

1 I am the pioneer of making wines from  
2 organically grown grapes. We are celebrating  
3 our 30th year. I've spent my entire life, 40  
4 years, in the organic food industry.

5 I've tried to be in the right  
6 place at the right time but I have suffered  
7 because of this misunderstanding of how wines  
8 need to be made and the benefits have not come  
9 my way. I still am committed to producing  
10 wines made from organically grown grapes but  
11 we get no premium for our product at all  
12 because of the misconception that is out there  
13 and the confusion.

14 I made wine when the natural food  
15 industry didn't allow alcohol in their  
16 establishment when they considered that not  
17 part of a healthy diet. I've come a long way  
18 and I've always been in the right place but  
19 it's never been the right time yet and I hope  
20 we can clear that up.

21 What I'm here though is for a more  
22 immediate need for clarification although I



1 support the speakers before me. One of them  
2 is that wine has to be understood. Wine is a  
3 family of derivatives. Now, that term is not  
4 very well received at the moment. Wine is not  
5 just hardy burgundy.

6 Wine can be red wine, white wine,  
7 rose, sweet, off-dry. It could be dry. It  
8 could be sparkling. It could be a brandy. It  
9 could be a sherry-like wine. It can be a  
10 fortified wine like a port. It could be  
11 vinegar and it could be a distillate. That's  
12 the family of wine and that's what our product  
13 is is a family of products all derived from  
14 the organically grown grape.

15 Well, recently I started making  
16 vinegars about three years ago and CCOF is  
17 saying that I can't call my vinegar "made from  
18 organically grown grapes." The fact of the  
19 matter is what is vinegar?

20 Vinegar is part of the family of  
21 wine and all I do with vinegar is I cull out  
22 wines that I don't feel are good enough for

1 our label to be bottled as a wine and I move  
2 them to what I call the vinegar house because  
3 they can't be in the winery and I allow oxygen  
4 and time to take them to their end result,  
5 vinegar.

6 Now, what do I tell my customers?  
7 Where is this vinegar from? It's from  
8 organically grown grapes. It's the same exact  
9 product. It's just part of the family of wine  
10 so I want to have that cleared up.

11 This family is wine is well  
12 supported by the TTB, and I think this form is  
13 an old form but the 702 form that we have to  
14 fill out has categories which list all these  
15 different things whether it be sparkling wine,  
16 a distillate, under 14 percent, over 14  
17 percent, and vinegar. It's all in the same  
18 form. The definition of what is this family  
19 of wine that already exist, nobody has to  
20 redefine that.

21 Another issue I have is the  
22 interpretation that somehow my product is

1       poison when it comes to making an organic  
2       product with my wine and/or any of the family  
3       of my wines in it. My wines meet all of the  
4       95 percent rule.

5                   As a matter of fact, when CCOF  
6       pushed me to put ingredient labels in the very  
7       beginning when the TTB didn't require them, I  
8       put on there 99.999 percent organic  
9       ingredients and then sulfur dioxide. I mean,  
10      that is how ludicrous this is. Somehow CCOF  
11      is making the decision that I cannot use my  
12      product in an organic product.

13                   For instance, I could take my  
14      vinegar and just boil it with organic sugar  
15      and make a beautiful sweet and sour hard  
16      candy. I could blend it with olive oil and  
17      make a beautiful, you know, vinaigrette  
18      dressing.

19                   There are all sorts of things  
20      whether it be culinary sauces, mustards,  
21      jellies, marinades, reductions, confections,  
22      all sorts of things that I spent my life

1       wanting to make a product that I would be able  
2       to use that in making other products.  
3       Supposedly I can't do that.

4                 This has been a revelation that  
5       just come to me in the past six months and I  
6       can't believe what I hear on that regard.  
7       Another item is labeling requirements. For  
8       some reason wine has been relegated to having  
9       different requirements than any other product  
10      has.

11                Take, for instance, apple juice.  
12      The apple juice fellow can every morning start  
13      to juice apples of many different varieties,  
14      from different sources, and different blends,  
15      different percentages, and then slaps the same  
16      label on that he's been using for 10 years.

17                Somehow because I make wines that  
18      have vintage dates on them I have to have a  
19      product profile for every single one of these.  
20      That's ridiculous and it's putting a standard  
21      in front of me that doesn't exist with any  
22      other organic product there is.

1 I ask you, this is immediate need,  
2 to clarify those three issues, that vinegar is  
3 wine, that I should be allowed to use any of  
4 my products in making of organic products, and  
5 that this labeling requirement should be no  
6 greater than any other organic product that's  
7 out there.

8 CHAIRPERSON GIACOMINI: Questions?

9 Tracy.

10 MS. MIEDEMA: Sir, have you  
11 checked with TTB on that third question you  
12 had because the provenance and the variety of  
13 the grape seems to be outside the purview of  
14 USDA. That seems to be a secondary labeling  
15 requirement of wine.

16 MR. FITZPATRICK: I always refer  
17 to CCOF, "You should not be creating labeling  
18 requirements. TTB has that all covered. We  
19 are allowed to not have to resubmit for label  
20 approval for a whole host of reasons. One is  
21 vintage doesn't trigger that, alcohol doesn't  
22 trigger that.

1                   The percentage of the grapes if  
2                   you don't list them on the label you just put  
3                   a varietal there and it doesn't trigger that.  
4                   TTB has it all worked out and that is all that  
5                   should be enforced within the organic realm of  
6                   labeling is what TTB rules are.

7                   CHAIRPERSON GIACOMINI: Further  
8                   questions? Thank you.

9                   Chris from ZD, Patrick Riggs, and  
10                  Amelia Slayton.

11                  Sorry on your last name. I'm  
12                  Italian, too, but I'm not going to try that  
13                  one.

14                  MR. PISANI: It's Pisani.

15                  CHAIRPERSON GIACOMINI: Pisani.  
16                  You pull that fire thing and switched the  
17                  letters.

18                  MR. PISANI: My name is Chris  
19                  Pisani. I am the wine maker at ZD Wines in  
20                  Napa, California. I apologize in advance.  
21                  I'm going to address the sulfite issue in wine  
22                  making, in particular the made with

1 organically grown grapes. I do want to say  
2 that I also support the previous speakers and  
3 their approach.

4 A brief background. ZD Wines is a  
5 small family-owned winery in Napa Valley that  
6 has been making wine since 1969. The de Leuze  
7 family has been deeply committed to organic  
8 farming practices producing wines of high  
9 quality and distinction.

10 Our state vineyard in Rutherford,  
11 California has been farmed organically since  
12 1985. It was certified in 1999 via CCOF.  
13 Another property we purchased in the Carneros  
14 in 1996 was immediately converted to organic  
15 farming after our purchase and also certified  
16 our winery in 2001 as a handler.

17 We are committed to producing  
18 first and foremost a premium product. We use  
19 always the best ecological practices and  
20 methods that are available to us that even go  
21 outside the realm of organic farming. As part  
22 of that we recognize, as many other wine

1 makers do, that sulfur dioxide is critical to  
2 the process of making high-quality wines.

3 There is currently no other known  
4 substance available approved for use in wine  
5 making that has the same antioxidant  
6 properties as sulfur dioxide. While we make  
7 every attempt to keep the additions of S02 to  
8 a minimum, and there have been many  
9 technological advances in wine making that  
10 allow us to do just that, there are several  
11 things about S02 that pose problems for us.

12 Quickly, the nature of S02's action  
13 in wine is that it's strongly pH dependent  
14 and, as a result, a wine with a lower pH, say  
15 3.3, may require only 25 parts per million to  
16 protect it while a wine at 3.6 or 3.7 can need  
17 upwards of 50.

18 Also, sulfur dioxide is extremely  
19 reactive in wine. It reacts and binds and  
20 essentially becomes inactive with many of the  
21 other compounds; tannins, polyphenols in that  
22 product and, again, no longer protects the



1 wine.

2 I should also mention that it is  
3 produced naturally by yeast. I have  
4 personally documented levels in wines that  
5 have had no sulfur dioxide added  
6 prefermentation to finish in the range of 26  
7 to 40 part per million as total. That's  
8 coming just from yeast metabolism.

9 As a result what has wound up  
10 happening to us on many occasions is because  
11 of the NOP Rule 205.605(b) that specifically  
12 states that wine made with organically grown  
13 grapes cannot have more than 100 parts per  
14 million total.

15 I could find no reason or record  
16 of where that 100 part per million number came  
17 from. As it stands right now the FDA  
18 recognizes sulfur dioxide as GRAS or generally  
19 recognized as safe and regulates its limit at  
20 350 parts. I doubt there are many wineries  
21 right now under the "made with" label that  
22 have wines that can approach that level.

1                   Unfortunately what has happened to  
2                   us on several occasions we've made wines with  
3                   100 percent organically grown grapes, followed  
4                   all the NOP rules, no DAC, no sulfate, only to  
5                   have our levels at 105 or 106 at bottling so  
6                   basically we're almost there.

7                   That being said, I mean, basically  
8                   we're just petitioning and, again, if you  
9                   agreed with the previous speakers and went  
10                  that route, I wouldn't be up here asking for  
11                  it. I would at least like to petition the  
12                  Board to revisit the S02 issue.

13                  A lot has been learned about its  
14                  chemistry since the late '80s when a lot of  
15                  the stuff came out after the famous salad bar  
16                  incident with sulfites. It would be great if  
17                  we could revisit that and potentially raise  
18                  the level and match the FDA 350. Thank you.

19                  CHAIRPERSON GIACOMINI: Questions?  
20                  Just a couple quick things. Your speculation  
21                  is that the 105, 106 you're achieving  
22                  bacterial fermentations is what's pushing you

1 over the top?

2 MR. PISANI: Not from bacterial,  
3 from the yeast fermentation.

4 CHAIRPERSON GIACOMINI: Yeast  
5 fermentation. Right.

6 MR. PISANI: We start in the hole  
7 already sometimes at 40.

8 CHAIRPERSON GIACOMINI: It's late.  
9 Okay. You said there is no alternative. I'm  
10 going to throw you a softball because I know  
11 we've talked before. Why do you know there is  
12 no alternative?

13 MR. PISANI: Well, my  
14 understanding is that there currently is a one  
15 million dollar prize out there given through  
16 the University of California Davis or somebody  
17 affiliated with it to come up with another  
18 material with the same antioxidant properties  
19 and it has not been done. I don't have an  
20 answer. I haven't been involved in finding  
21 one but when somebody does, there is a nice  
22 fat pay out there for you.

1                   CHAIRPERSON GIACOMINI: I haven't  
2 searched that out but it might be with the  
3 Pasteur Institute, I think. Can you go into  
4 a little more very briefly on the algae  
5 situation?

6                   MR. PISANI: Yes. I did some  
7 reading up on that. Basically my  
8 understanding is that back in the late '80s  
9 after the salad bar incident, and maybe people  
10 don't know the salad bar incident. It was a  
11 case where they were spraying a very high  
12 concentration of potassium metabisulfite over  
13 their salad bar to preserve the vegetables.

14                   A person that was asthmatic ate  
15 the vegetables and had a very severe reaction  
16 so this, of course, I believe the FASEB and  
17 the FDA combined forces and looked at the  
18 whole sulfite issue. The 350 I'm not sure how  
19 they came up with that. I looked and did find  
20 some papers that found that there is a very  
21 percentage essentially of asthmatics. I think  
22 the number is .4 percent of people with asthma

1 that can potentially have a reaction to  
2 sulfites.

3 Those people that have that  
4 sensitivity are aware of it and they avoid  
5 jams and jellies, juice concentrates. There  
6 are plenty of products out there that have 10  
7 times the level of sulfites in their products.  
8 I've seen numbers as high as 6,000.

9 The numbers in wine are really  
10 already way, way below those thresholds. I  
11 found one particular university study that  
12 said that under 200 parts per million it was,  
13 I think, a sample of 30 asthmatics with the  
14 condition that had no reaction at all in the  
15 200 ppm range.

16 CHAIRPERSON GIACOMINI: Okay.

17 Thank you.

18 Patrick Riggs, Amelia Slayton, and  
19 Patrick Leavy.

20 MR. RIGGS: Hello. My name is  
21 Patrick Riggs. I'm a viticulturist for Jack  
22 Neal and Son Vineyard Management. I've been

1 around since 1968. Started farming  
2 organically in '84. Responsible for the  
3 organic certification of over 1,800 acres in  
4 the Napa Valley. 95 percent of the stuff we  
5 farm is currently organic certified or in the  
6 three-year transition process. We also serve  
7 as a wine grower for over 75 individual  
8 wineries.

9 The organic wine labeling  
10 standards and the consumer confusion  
11 surrounding that has prevented the development  
12 of a organic wine grape market as is typical  
13 with most other commodities. If this market  
14 existed more growers would transition to  
15 certified organic farming.

16 Despite the absence of this market  
17 many wine growers have gone organic because  
18 they believe in organic farming. However,  
19 economics can and will change that equation.  
20 I'll give you a specific example. One of our  
21 previous clients had 450 acres of certified  
22 organic wine grapes in the Napa Valley.

1           In 2008 when the market started to  
2           move down a decision was made despite the  
3           displeasure of the owner and they transitioned  
4           back to conventional agriculture because they  
5           did not believe that organic wine growing and  
6           the associated standards was economically  
7           viable in the long term. I disagree with this  
8           but that's the fact.

9           The Board labeling in the lower  
10          standard that others have eluded to around the  
11          70 percent "made with organic" claim has  
12          blurred the lines between certified organic  
13          and sustainable or other green farming  
14          methods. This is a disservice to organic  
15          farmers who work their butts off and are held  
16          to really high standards. A 95 percent  
17          threshold makes a lot more sense.

18          If you make vineyard designated  
19          wine 95 percent of the grapes have to come  
20          from one place, that's what the TTB uses. It  
21          makes more sense to use that requirement.  
22          This would also allow growers a little

1 flexibility because there are other issues  
2 with buffer rows and neighbor issues such as  
3 pesticide drift that are beyond the individual  
4 growers' control.

5 Due to a variety of factors  
6 including the standards around wine labeling  
7 many organic wines have been received by  
8 consumers as being of low quality. Whether  
9 this is fact or fiction does not matter.

10 Most of this perception is due in  
11 part to old and poorly conceived standards  
12 surrounding wine processing aids that were  
13 previously talked about which typically make  
14 up less than .1 percent of the final product.  
15 This is a catch 22. It prevents wineries from  
16 making organic wine and making wine made from  
17 organic grapes and, therefore, growers have no  
18 market for organic wine grapes.

19 Finally, slightly different. I  
20 would love it if you guys could address the  
21 removal of a term "organic" in trade names  
22 unless these trade names are, indeed,



1 certified organic. This is a disservice to  
2 everybody who is certified organic across the  
3 spectrum. That's all I got.

4 CHAIRPERSON GIACOMINI: Thank you.  
5 Questions? Joe.

6 MR. SMILLIE: Could you clarify  
7 your role again? I didn't quite understand.

8 MR. RIGGS: I'm a viticulturist.  
9 I'm in the field every day concerned about  
10 producing the highest quality.

11 MR. SMILLIE: So you work for a  
12 number of different wineries and grape  
13 growers?

14 MR. RIGGS: Yes.

15 CHAIRPERSON GIACOMINI: Okay.  
16 Thanks, Patrick.

17 MR. SMILLIE: It's more for the  
18 program. Is there an understanding that if  
19 you're a wine producing and you've got organic  
20 in your name, because the only claim open to  
21 you is the "made with" claim, that you're  
22 pending policy on organic and the "made with"

1 products, is that going to be an exception?

2 MR. McEVOY: Yes, that's the  
3 concept is that would be the exception because  
4 it's 100 percent organic ingredients and that  
5 we would provide that exception. That's what  
6 we're thinking in terms of the draft guidance.

7 CHAIRPERSON GIACOMINI: Okay.  
8 Amelia, Patrick Leavy, Jon Cadoux.

9 MS. SLAYTON: Hello. My name's  
10 Amelia and I have been in the organic growing  
11 supply business since 1997 and also a brewer  
12 of beer and recipe development for our company  
13 since 1996. I'm here to talk about the  
14 organic hops issue. Currently organic beer is  
15 brewed in the US with nonorganic hops and they  
16 are on the 205.606 list. We are requested  
17 that they be removed when they sunset in 2012.

18 Having been in this business for a  
19 very long time we learned some significant  
20 reasons why we feel this should happen. The  
21 first and foremost is that hops are a key  
22 ingredient in beer and everybody who is a beer

1 fanatic who knows this. It's like making  
2 certified organic vanilla pudding and using  
3 nonorganic vanilla.

4 As a brewer for many years I've  
5 had the opportunity to work with a very  
6 limited array of hops. In the early years  
7 from the first time I got samples from New  
8 Zealand and Germany I decided to only use  
9 organic hops. Today our company has recipes  
10 for 25 different styles of beer.

11 We now offer 25 different kinds of  
12 organic hops so the market has changed  
13 significantly in the 13 years that we've been  
14 in business. We strongly believe that putting  
15 a USDA seal on a bottle of beer that is made  
16 without organic hops is very misleading to the  
17 public.

18 One of the reasons I'm here today  
19 is as an activist and not particularly as a  
20 company but I've been working on a petition  
21 that is a public outreach petition and it's  
22 interesting the reactions that people have

1 when they learn that this beer is made without  
2 organic hops. We have gathered about 600  
3 signatures that I would like to give to you  
4 folks today if I could.

5 Another reason we feel strongly  
6 that this hops needs to be removed from the  
7 list is that there has been very little  
8 financial incentive in the organic hops market  
9 in the US in the past few years to change.

10 To give you an example just from a  
11 business standpoint, last year we had to  
12 cancel two-thirds of a huge contract with  
13 Germany because we didn't have buyers for the  
14 hops. We tried to sell them. We tried to  
15 sell them. We called breweries and when we  
16 are trying to sell hops for \$15 a pound and  
17 they can use hops that are \$5 a pound, that  
18 really makes it a difficult sell.

19 Going back to consumers because  
20 I've been in this meeting all day and I really  
21 appreciate what you guys do here and I really  
22 appreciate the opportunities to be able to

1       come here because if it was in Washington  
2       there would be no way for me to be able to  
3       take the time and spend the money to go.

4                 That's the truth for a lot of  
5       people who are concerned about organic but  
6       can't be here. That's why I wanted to bring  
7       this petition that is from the public and has  
8       their comments and their sentiment so that you  
9       can see what they have to say about the issue.

10                One of the number one reasons that  
11       people buy organic is because they want to  
12       support organic sustainable earth friendly  
13       agriculture and requiring hops in organic beer  
14       will help achieve that.

15                Another big issue is the truth in  
16       labeling. We just constantly hear people who  
17       are just outraged that the product is labeled  
18       organic and it doesn't clearly say whether the  
19       hops are organic or not.

20                Finally, there is just an unfair  
21       market advantage. We work with a lot of  
22       breweries and we do sell wholesale and we do

1 sell to small and medium-sized microbreweries.  
2 Those breweries are paying twice as much for  
3 hops and they have an unfair market advantage  
4 because some of these breweries have a very  
5 strong commitment toward agriculture.

6 They are taking that step. The  
7 largest source of funding to develop organic  
8 hop growing is from the largest end user which  
9 are breweries. If there is a requirement by  
10 2012 that they have to use organic hops, maybe  
11 they will. Thank you.

12 CHAIRPERSON GIACOMINI: Any  
13 questions? Steve.

14 MR. DeMURI: Thank you for your  
15 comments. I'm trying to understand your  
16 affiliation. Are you a hops broker?

17 MS. SLAYTON: Yes.

18 MR. DeMURI: Okay. Do you ever  
19 have certifiers calling you and asking you for  
20 information on commercial availability of  
21 organic hops?

22 MS. SLAYTON: No.

1 MR. DeMURI: No. My other  
2 question would be are you ever aware of any  
3 hops varieties that have been requested as  
4 organic that are not available as organic?

5 MS. SLAYTON: Yes. Some of that  
6 has changed but there are almost 200 varieties  
7 that we know of and it's unrealistic to wait  
8 until all of those varieties are available.  
9 There are major classes of hops and good  
10 substitutions.

11 As a brewer for 15 years I know  
12 what those are and can make educated  
13 recommendations for developing recipes with  
14 ultimate hops. You do have to be a little  
15 creative and you do have a more limited range  
16 of ingredients than a conventional brewer but  
17 it is a starting place and we've got a pretty  
18 good starting place now.

19 MR. DeMURI: Okay. Thank you.

20 CHAIRPERSON GIACOMINI: Joe, did  
21 you have a question?

22 MR. SMILLIE: That's the quality.

1       What about just total overall quantity of  
2       hops? Do you believe that there is organic  
3       hops available for all the organic growing  
4       that is currently occurring?

5                   MS. SLAYTON: If we start  
6       transitioning now for 2012 I believe we'll be  
7       there. With world organic hop production I  
8       believe we have the capability to do it but it  
9       takes money. It takes money coming into the  
10      system now. If someone asked me today if I  
11      can provide them with 100,000 pounds of hops,  
12      I would say no.

13                   We just don't have that buying  
14      power yet. We had to turn away 10,000 pounds  
15      of hops from Germany because we didn't have  
16      buyers. If we work towards that goal in two  
17      years we can get there. It just takes money.

18                   CHAIRPERSON GIACOMINI: Jay.

19                   MR. FELDMAN: So thank you for  
20      your comments. This is the challenge and  
21      maybe you can help us because the burden on  
22      the Board is to figure out whether there is



1 commercial availability in the organic  
2 alternative.

3 Some of this will come up in a  
4 conversation on sunset but rather than a  
5 listed petition, I mean, we know people are  
6 outraged by these sorts of things, the  
7 information that would help move the Board  
8 into a position of taking action on this  
9 criterion of commercial availability would be  
10 data that would show us in some format that  
11 would be reliable that the market could be  
12 filled. The market demand could be filled by  
13 the organic alternative.

14 MS. SLAYTON: I don't have that  
15 data today but it's something I'm happy to  
16 work on to give to you by the fall meeting.

17 MR. FELDMAN: The reason I'm  
18 intrigued by this is because this is not a  
19 problem unique to hops. This is a generalized  
20 problem that the Board needs to work more  
21 closely with the community, the organic  
22 community on. If you could be a trail blazer

1 in this area, it would be phenomenal, I think.

2 MS. SLAYTON: Do you know there are  
3 organic hops being sold to conventional  
4 breweries because they don't have buyers from  
5 organic breweries. I don't have the solid  
6 numbers but we can get those.

7 CHAIRPERSON GIACOMINI: Jeff.

8 MR. MOYER: I think to follow up  
9 Joe sort of asked my question but it's a two-  
10 part question. One is is it available and if  
11 it is available then it would be incumbent  
12 upon you to petition this Board not, as Jay  
13 said, to give us a stack of petitions but to  
14 petition the program to have hops removed from  
15 606 and then that would come to the Board.

16 MS. SLAYTON: That has been done  
17 and I participated in that as well.

18 MR. MOYER: But we don't have it  
19 yet.

20 MR. SMILLIE: Yes, we do.

21 MR. MOYER: Oh, you have it.

22 MR. SMILLIE: It's on our work

1 plan.

2 MR. MOYER: Oh, never mind.

3 MS. SLAYTON: We're taking two  
4 different approaches to it. I did have a  
5 question. Can I give these two today or  
6 should I --

7 CHAIRPERSON GIACOMINI: Give those  
8 to Valerie and we'll get them. Katrina.

9 MS. HEINZE: To clarify for you,  
10 Jeff, we do have the petition to remove hops  
11 and sulfites that we don't officially have.  
12 I do not need an answer for this today but  
13 when we reviewed hops to put it on 606 one of  
14 the big arguments had to do with drought and  
15 pest residence.

16 I don't remember all the details  
17 but perhaps you could look at the original  
18 petition and some of our deliberations. It  
19 would be very useful for us in the fall to  
20 have some public comment on those particular  
21 topics. Thank you.

22 CHAIRPERSON GIACOMINI: Joe.

1                   MR. SMILLIE: Just a small point.  
2           It's not up to the Board to determine  
3           commercial availability. It's up to the  
4           certification agencies to determine  
5           availability. There's a lot of ways to do  
6           that but one of the most common ones is if you  
7           are producing vanilla pudding without organic  
8           vanilla and you've got three competitors who  
9           are using organic vanilla, you better have  
10          some pretty good argument why you're not using  
11          it.

12                   That's not the be all and end all  
13          of commercial availability but it's certainly  
14          an early indication. If a large volume of  
15          organic beers start showing up on the market  
16          with organic hops in it, then the antenna  
17          start pointing at, okay, commercial  
18          availability is starting to happen and now the  
19          scrutiny starts to go onto their clients who  
20          are not using organic hops so it's kind of  
21          push you/pull me kind of situation for  
22          commercial availability.

1 I agree with you it is a catch 22  
2 but 606 is designed to spur organic production  
3 and that's the certification agent's job is to  
4 make sure that their --

5 CHAIRPERSON GIACOMINI: Joe, do  
6 you have a question in there, please?

7 MR. SMILLIE: No question.

8 MS. SLAYTON: I do have a  
9 response, though. I mean, the problem that we  
10 see is that the label looks exactly the same  
11 to the consumer whether it has organic hops or  
12 whether it doesn't. Unless there is a  
13 distinction, we want hops off the list.

14 CHAIRPERSON GIACOMINI: Any  
15 further questions?

16 MR. FELDMAN: I have a question  
17 for Joe.

18 CHAIRPERSON GIACOMINI: No. No.

19 MR. FELDMAN: I'll ask you later.

20 MR. SMILLIE: See me later.

21 CHAIRPERSON GIACOMINI: All right.

22 Thank you.

1 Patrick Leavy, Jon Cadoux, and  
2 Bill Wolf on hold.

3 MR. LEAVY: Mr. Chairman and  
4 members of the Board, I would like to thank  
5 you for the opportunity to speak today. My  
6 name is Pat Leavy and I am current president  
7 of the American Organic Hop Growers  
8 Association. I've grown hops for 33 years and  
9 I'm in my fourth year of organic hop  
10 production.

11 On December 8th of 2009 a petition  
12 was filed by the American Organic Hop Growers  
13 Association to remove hops from 606 of the  
14 National Organic Program. The decision to  
15 file the petition was made last summer before  
16 the timeline for the sunset process for  
17 agricultural ingredients added in 2007 was set  
18 in motion.

19 At the time we felt organic hops  
20 were commercially available and their  
21 continued placement on the National List was  
22 undermining the further development of organic

1 production. It was imperative to start the  
2 process before organic production was  
3 discouraged, particularly here in the US

4 Also, we have submitted comments  
5 for this meeting. These comments request that  
6 a timely review of the petition given the  
7 timeline that has been set out for the sunset  
8 process it is a moot point. A decision will  
9 be made this fall. I ask that question. Is  
10 that an accurate statement?

11 CHAIRPERSON GIACOMINI: No and  
12 yes. It's not moot. We could vote to keep it  
13 on sunset and then consider your petition.

14 MR. LEAVY: Okay.

15 CHAIRPERSON GIACOMINI: They do  
16 not have to --

17 MR. LEAVY: Okay. Thank you.

18 CHAIRPERSON GIACOMINI: Yes.

19 MR. LEAVY: Because that's  
20 something new. It's sort of like, it's been  
21 lately, which way did they go.

22 CHAIRPERSON GIACOMINI: They maybe

1 overlap but it's a matter of receiving  
2 information. If we can't get all the  
3 information we need, we would vote to continue  
4 to sunset and then with more information  
5 consider the petition to remove.

6 MR. LEAVY: Again, this gets into  
7 how this should be done. The petition is in  
8 place. Should we resubmit these arguments or  
9 our position in the comment period also?

10 CHAIRPERSON GIACOMINI: Whenever  
11 you can.

12 MR. LEAVY: Okay. Because we have  
13 additional information to provide on that and  
14 your questions are helpful. Thank you.

15 CHAIRPERSON GIACOMINI: Yes.

16 MR. LEAVY: Okay. While I'm here  
17 I would like to make the following points.  
18 Today there are unsold organic hops available  
19 in the spot market. Today organic hops are  
20 being used in the production of nonorganic  
21 beer. This may seem like an accomplishment  
22 but it would be better to see organic hops in



1 organic beer.

2 Nearly 100 percent of the  
3 nonorganic hops being produced in 2010 are  
4 under contract. This is a number exceeding  
5 over 30,000 acres. Whereas, less than 10  
6 percent of the organic hops being produced in  
7 2010 are under contract.

8 Since November of 2009, board  
9 members of the association have listed their  
10 farms on the Accredited Certifier's  
11 Association 606 website. As of this day not  
12 one farm has received an inquiry resulting  
13 from this site.

14 Given the fact that certifiers  
15 required processors who have a system in place  
16 that regularly searches for organic  
17 ingredients and want to see commercial  
18 availability reviewed regularly, this is a  
19 disappointing development.

20 The question is how many varieties  
21 of hops must be available for hops to no  
22 longer be on the list. If the criteria to

1 remove an ingredient from the list is that  
2 every variety of the crop must be commercially  
3 available, very few crops, if any, would be  
4 removed from the list. If there's not enough  
5 varieties now how many more do we need? Five,  
6 10? What would be the number? Every year new  
7 varieties are coming into the system from the  
8 breeding programs.

9           Lastly, no one should be surprised  
10 by the removal of hops from the list. The  
11 sunset process is well known and everyone  
12 knows that a petition can happen at any time.  
13 Arguments that the removal of hops will  
14 disrupt the organic beer production can be  
15 made forever, especially when there has been  
16 very little effort to use organic hops.

17           CHAIRPERSON GIACOMINI: Thank you.  
18 Questions? I have a question for you as a  
19 hops grower. The information we received in  
20 2007 is that hops can tend to have a high  
21 susceptibility to molds. Is that a true  
22 statement from you as a hop grower?

1                   MR. LEAVY: Hops are susceptible  
2 to two funguses, downy mildew and powdery  
3 mildew. They are environment dependent. In  
4 Western Oregon, where I grow hops, downy  
5 mildew is an issue. In Eastern Washington  
6 powdery mildew is the issue.

7                   CHAIRPERSON GIACOMINI: Is that a  
8 problem for you as an organic hops grower?

9                   MR. LEAVY: I pick varieties, as  
10 we are supposed to do under the NOP as part of  
11 the pest control. I select varieties which  
12 have resistance to the disease and that is  
13 part of an organic farmer's responsibility.  
14 I grow varieties that are resistant to downy  
15 mildew as what I put in the market place.

16                   CHAIRPERSON GIACOMINI: Okay.  
17 Thank you.

18                   Jay.

19                   MR. FELDMAN: Do you think that  
20 hops should have been put on 606 originally?

21                   MR. LEAVY: I started in 2007 with  
22 a 10th of an acre of hops, of organic hops.

1 I thought about commenting at the time and  
2 felt I did not have enough expertise or  
3 experience to do it. I would say yes. That  
4 was a decision that I could not argue with.

5 Looking back on it now, I would  
6 change my mind because of the spirit I have  
7 seen in the marketplace. It won't work this  
8 way but it would have been a good backup  
9 system. In other words, as the organic hop  
10 industry developed and, say, there were  
11 problems or a little bit of a supply issue,  
12 then the option of using a nonorganic hop  
13 would have kept the organic beer makers going.

14 I could see if it was done right,  
15 as a good system. As of today I think it is  
16 very damaging to the business. We have put  
17 our organic operation on hold until the  
18 situation changes so, yes. Sorry.

19 MR. FELDMAN: And a quick follow-  
20 up. Do you see any situations in which  
21 certifiers are not appropriately or adequately  
22 defining commercial availability of the

1 organic hops? Do you have specific instances  
2 where certifiers in your view did not  
3 adequately disallow conventional hops, given  
4 the availability of organic?

5 MR. LEAVY: I can get in a lot of  
6 trouble here. I mean, to be honest with you,  
7 there's blow-back on being up here, in the  
8 market place, that I can handle. Then there  
9 can be blow-back on certifiers. There are  
10 things -- I can give you an example.

11 I don't know if the certifier  
12 accepted this so I swill not put this in the  
13 certifier -- it's not quite what you wanted --  
14 but I had an organic brewer who made sort of,  
15 we'll say, a blanket email through the Oregon  
16 Hop Commission to all the growers in  
17 Oregon saying that I'm looking for organic  
18 hops closer to home.

19 The reason that was said is that a  
20 lot of organic hops are grown in New Zealand  
21 and in Germany. The email is coming, "I want  
22 them closer to home." Okay, fine. I knew

1 this brewery. I've had contact with this  
2 brewery. They know I exist, so I thought  
3 about whether to respond.

4 I responded back, just to do it,  
5 told them which varieties I have and have  
6 never heard back. Now, if I was a certifier  
7 I would not have accepted that as sourcing and  
8 there are two reasons. First of all, they are  
9 under an obligation to source for that hop in  
10 the form. All they did was ask if I wanted to  
11 grow organic hops.

12 I wouldn't have accepted because  
13 they'd never asked for the form so how am I  
14 supposed to know what organic hop is desired?  
15 Not only are they supposed to look for the  
16 hops with the right form but they also talk  
17 about quantities so I did not even get, "I  
18 want 5,000 pounds of variety X, Y, Z."

19 I don't know if it is but I would  
20 not have accepted that as one of the attempts  
21 to source organic. It did not ask for  
22 variety. It did not ask for quantity. The

1 big problem that they are having is a  
2 reluctance by breweries to give us any  
3 information and I have another example but,  
4 you know, there's people waiting. Thank you.

5 CHAIRPERSON GIACOMINI: Thank you.  
6 Jon Cadoux, Bill Wolf, Richard Holt.

7 MR. CADOUX: Thanks for the time.  
8 Valerie, thanks, before I even start, for just  
9 helping me out with this PowerPoint. I really  
10 appreciate it.

11 I'm Jon, I'm the founder and I'm  
12 the president of Peak Organic Brewing Company.  
13 We're out of Portland, Maine. I thought it  
14 would interesting to give a little bit of  
15 perspective from the brewer's side. We are  
16 one of the few brewing companies in the  
17 country.

18 I think there are under five who  
19 just exclusively brews organic beer so it's  
20 not a line extension for us. It's literally  
21 100 percent of what we do. We're not  
22 diversified. Organic beer is everything to

1 us. I think that the perspectives before me  
2 were interesting.

3 I think that we all sort of agree  
4 on the 10,000 foot view that we all wish that  
5 organic beer was brewed with 100 percent  
6 organic hops. It's just that right now, at  
7 least today, that's not a reality. There are  
8 things that we can do in the future that I  
9 want to talk about to get there.

10 I think that we need to be really  
11 sensitive to brewers, too, who are critical to  
12 this entire supply chain and sort of the  
13 things that we're up against. The first  
14 thing, the challenge for us is that when a  
15 supply of 100 pounds of any organic variety  
16 comes up we're buying varieties in the  
17 thousands of pounds so that's what we need,  
18 sort of, to brew our beers.

19 Another thing, there is a lot of  
20 talk in this petition about unsold organic  
21 hops and I've looked a lot into it and I agree  
22 with the fact that there are some out there



1 that are unsold. The one that I've noticed is  
2 in the biggest quantity is the Palisade hop.

3 Valerie, if you go to the next  
4 slide real quick. A couple of years ago  
5 Anheuser-Busch decided to get in the organic  
6 beer game and they came out with a couple  
7 different organic beer labels and encouraged  
8 and worked with some farmers to create an  
9 organic Palisade hop which came out in really  
10 large quantities.

11 Then they have since backed out of  
12 that game, so now the Palisade hop, which Peak  
13 doesn't use and I think probably the vast  
14 majority of other organic brewers do not use,  
15 is sort of out there for consumption and it  
16 puts us in a difficult spot because it's not  
17 a hop that we use. Again, they encourage  
18 those farmers to grow a whole lot of that hop  
19 so it's a really difficult situation.

20 One thing I want to talk about is  
21 the fact that hops are not hops are not hops.  
22 There is this sort of notion of

1       interchangability which I think is really  
2       complicated. Different hop varieties have  
3       really different characteristics and the  
4       demand levels for different hop varieties vary  
5       considerably based on those characteristics.

6                 These are two examples that I  
7       thought I would give you guys. The one on the  
8       left is the Palisade that I talked about  
9       before, and I highlighted in red some of the  
10      things that are critical to the conversation.  
11      This is sort of a spec sheet if you will.  
12      Both are aroma-type hops.

13                The Palisade hop gives off these  
14      sort of earthy herbal aromas and tastes and  
15      the Centennial, which is an increasingly  
16      popular hop used in IPAs, which is a very  
17      popular style, gives off more of a citrusy,  
18      floral flavor.

19                They are both technically hops, no  
20      doubt about it, but the flavor and the aroma  
21      that they give off are wildly different. I  
22      think that is something that really needs to

1 be taken into consideration. The key thing  
2 here is the oils, if you look at the bottom.

3 So the Palisade is pretty high on  
4 this caryophyllene oil. Sixteen to 18 percent  
5 of its total oils are that and, again, that  
6 oil gives off those sort of earthy, herbal  
7 aromas and flavors. Then the Centennial, the  
8 myrcene oil is 58 percent of total oils. That  
9 oil contributes to that big citrusy, floral  
10 taste profile.

11 And this is the taste profile that  
12 is really popular in the marketplace right  
13 now. That's just not something we can  
14 control. Consumers when they are buying craft  
15 beers are looking for hoppy beers, citrusy  
16 beers. That's what's selling.

17 Go to the next slide. This is on  
18 interchangeability. This is the opinion of  
19 Ian Ward, who is the president. He is a Ph.D.  
20 of Brewer Supply Group. I highlighted the key  
21 parts here; but, today there are huge  
22 variations in one hop variety to the next;

1 different concentrations of over 150 aromatic  
2 oils which interact to produce very different  
3 organoleptic responses in the human palate.

4           Some hops will possess a very  
5 citrusy character, others pine-like, and some  
6 will possess spicy hops. Indeed, they are  
7 examples of the same varieties grown. I'll  
8 skip forward. In this author's opinion it is  
9 possible for international brewers to swap  
10 varieties of hops but the same cannot be said  
11 for craft brewers.

12           I'll skip ahead. This just shows  
13 which brews are most popular in the market  
14 place right now. Again, pale ales, amber  
15 ales, IPAs using these citrusy hops.

16 Interchangeability, again, we just see, out in  
17 the marketplace, it's absolutely critical that  
18 we have sufficient quantities of critical hop  
19 varieties. That is sort of part of 606, in my  
20 understanding.

21           Contracts. Peak. I can only  
22 speak for ourselves. Nearly 100 percent of

1 our barley and our hops are contracted and we  
2 believe, anyway, that we've done a lot to spur  
3 the supply of organic hops and organic barley  
4 and this has come at a huge cost. Right now  
5 our Hallartau contract is \$27 a pound. I can  
6 buy at Spot for 9 so we have incurred  
7 absolutely huge costs for this but it's  
8 something that we're passionate on.

9 I have one more slide at the end  
10 that I would really love to show you guys, if  
11 that's okay. These are just some of our  
12 farmers doubling of organic barley over the  
13 least two years. Sorry, Valerie. If you  
14 could just keep going. Doubling the use of  
15 organic wheat, doubling the use of organic  
16 hops through contracts.

17 I guess we can go to the next one.  
18 Suggested next steps. Okay. The good news  
19 is, I think, like Amelia and Pat were saying,  
20 there's been some really nice progress in the  
21 availability of organic hops, there is no  
22 doubt about it. There is a lot of acreage.

1                   CHAIRPERSON GIACOMINI: Could you  
2 give that to us in a hard copy rather than  
3 reading through the whole thing and wrap up  
4 this?

5                   MR. CADOUX: Can I wrap it up now?

6                   CHAIRPERSON GIACOMINI: You can  
7 wrap it up now, but don't read the whole  
8 thing.

9                   MR. CADOUX: Good. Last thing.  
10 So that's the good news. The bad news is a  
11 lot of this was used for one particular hop  
12 variety and other varieties that are just not  
13 currently in demand so what we believe is,  
14 it's up to us as brewers to give contracts to  
15 growers who have come on line and that is  
16 something that we are dedicated to doing.

17                   There's no doubt about it. We  
18 have done it in the past and we'll do it in  
19 the future. But I think, and I think I speak  
20 on behalf of brewers, there needs to be a lot  
21 of sensitivity to this whole  
22 interchangeability piece and the lack of

1 diversification with hops. If one of my  
2 critical hop varieties, 100 percent of it is  
3 coming from one farm, and for whatever reason  
4 that farm goes out of business, there is a  
5 weather event, something happens and that  
6 variety is gone and hops --

7 CHAIRPERSON GIACOMINI: Thank you.  
8 I think we understand where you're going.

9 MR. CADOUX: Okay.

10 CHAIRPERSON GIACOMINI: We just  
11 need to continue and move on. We're extremely  
12 far behind. Very quickly, questions.

13 Katrina.

14 MS. HEINZE: Just generally, for  
15 beer, how much is water, how much is hops, how  
16 much is whatever else goes into it? Like a  
17 30-second answer.

18 MR. CADOUX: Vast majority of it  
19 is water. Hoppy beer might be 1.5 percent  
20 hops. All of our beers are over 99 percent  
21 organic. Most are over 99.5 percent organic.

22 CHAIRPERSON GIACOMINI: Steve.

1 MR. DeMURI: Real quick. In your  
2 opinion how long do you think you need to get  
3 there?

4 MR. CADOUX: I think we can do it  
5 in 2012. I do. I think that if that is a  
6 hard goal and one thing goes wrong, we're in  
7 big trouble. Again, looking out there in the  
8 United States and Pat's association I think it  
9 seems like there are four farms out there  
10 right now that are capable of growing the type  
11 of acreage that we need.

12 If something were to happen with  
13 one of those, you know, it wouldn't work out.  
14 I do believe 2012 is possible but I think  
15 there needs to be some sensitivity to what is  
16 going to take to get there.

17 CHAIRPERSON GIACOMINI: Any  
18 further questions? Okay. Thank you.

19 Bill Wolf, Richard Holt. I'm gong  
20 to assume it's Stephen Colbert. I don't think  
21 Stephen Colbert is probably here.

22 One last thing, Jon. As Bill



1 comes up to the viral video that's going  
2 around, please keep it as beer and not  
3 sparkling malted barley beverage.

4 MR. WOLF: While Valerie is  
5 bringing up some slides, it's way after dinner  
6 time my time. I also submitted a proxy and I  
7 will not use the entire proxy. Nibble on  
8 those while I get ready for these public  
9 comments. I do have a proxy but I do not  
10 intend to use all of the second five minutes.  
11 I will be as brief as I can.

12 I'm going to talk about four  
13 specific areas that you all are struggling  
14 with and working with: first, on continuous  
15 improvement, second, on the stabilization of  
16 the regulatory environment, third, on  
17 clarifying synthetic definitions, and fourth,  
18 about inert ingredients.

19 To frame this, the roots of  
20 organic agriculture are obviously a healthy  
21 soil system. I've always talked about the  
22 core principles behind the decisions about

1 organic regulations being to ask the  
2 earthworm, to see what they like in the  
3 system. That's the frame.

4 Now I'd like to talk a little  
5 about continuous improvement because very few  
6 people look at organic as anything but the  
7 absence of certain things. We've got several  
8 new Board members here some of whom are  
9 familiar with this principle but I think it's  
10 critical to the way we think about moving  
11 forward, and organic is more than no chemical  
12 pesticides or fertilizers.

13 Built into the regulations I've  
14 referenced four examples, not just in  
15 cropping, not just in soils, but also in pest  
16 control and in facility management where it's  
17 embedded in the regs. With that in mind I  
18 want to talk about the principle of continuous  
19 improvement and request three ways to really  
20 promote continuous improvement.

21 The first one is something I've  
22 testified about several times in the past and

1       it's kind of bogged down. I know it's not at  
2       the top of the list but I'm going to address  
3       it both to the NOSB and the NOP, and that is  
4       that I think that if all ACAs had a place to  
5       post every commercial availability decision in  
6       a generic form, efficiently, on a website, it  
7       would give us all a transparent place to  
8       understand what is actually happening with  
9       decisions like organic hops or anything else,  
10      or organic seed, or the non-organic  
11      ingredients that are on 605.

12                   Which takes me to point B, which  
13      is, to apply organic preference to all  
14      ingredients. Period. Across the board.  
15      We're seeing that in regulations around the  
16      world. Canada has actually embedded it in  
17      fertilizer requirements.

18                   C. When the list was constructed,  
19      and I was one of the reviewers of some of the  
20      materials back in the '90s, we really weren't  
21      thinking about it being highly complex in the  
22      structure of the list. Having 605 be broken

1 into two sections and having 605 and 606  
2 separated has actually caused an awful lot of  
3 the discussions that we've been having.

4 I would say that longer-term a  
5 solution to some of these side debates where  
6 we are not encouraging earthworms and instead  
7 we are creating a lot of bureaucratic  
8 conversation might be to look at merging 605  
9 and 606 and reducing the debate about ag and  
10 non-ag and synthetic and nonsynthetic.

11 Next slide, please. This is where  
12 the heart of your work right now is so now  
13 we're going to get down in the bushes, your  
14 work about clarification of synthetics. First  
15 of all, the March 1 documents are  
16 extraordinarily thought out, well done, moving  
17 forward.

18 I think it does clarify the intent  
19 of synthetic and chemical change far better  
20 and it captures the precautionary principle to  
21 restrict and review manmade synthesized  
22 compounds. I think it improves the definition

1 of chemical changes so I support that work.

2 I do want to raise three concerns  
3 for consideration. One, continuing to  
4 watchdog against the use of the definition of  
5 synthetic that would cause the loss of  
6 commonly accepted natural materials by looking  
7 so closely at materials that we come up with  
8 the idea that somehow it's synthetic.

9 I can tell you from doing reviews  
10 of foreign regulations that they don't even  
11 look at inerts, carriers, processes. The  
12 active ingredient is all they look at. Now,  
13 I'm not saying that's right or wrong. I think  
14 actually they need to do more looking, for  
15 those foreign regs, but I think we've been  
16 looking way too deep.

17 I was president of the Board of  
18 OMRI for a number of years. I've not been on  
19 the Board for the last six. I believe that  
20 some of this work is going in the wrong  
21 direction. We are looking at the wrong -- not  
22 at the critical issues in organic. I want to

1 say, please, be careful what you do that  
2 causes damage to the availability of natural  
3 materials.

4 And I could give you some examples  
5 of those but I'm on a limited timeframe. I've  
6 heard conversations and I've worked on all  
7 kinds of issues like ion solutions that would  
8 technically be a chemical change if you look  
9 at it in one way as a chemist.

10 No. 2, I think that there are  
11 categories on the National List but they are  
12 generic categories such as insecticidal soap  
13 and sticky traps. And I think that, you know,  
14 for example, another category that really  
15 should have been petitioned should have been  
16 sugar esters rather than a specific compound  
17 within the sugar ester group. I present that  
18 as a concept because we are going down a road  
19 where we are going to end up without those  
20 groups.

21 Then, 3, there is a specific set  
22 of language, in the March 1, 2010 document

1 where the specific paragraph, the last  
2 paragraph of page 9, says, "the presence of  
3 any synthetic would cause a material to be a  
4 synthetic."

5 I think you need to clarify what  
6 you meant by the presence of any synthetic and  
7 I suggested some language here where it would  
8 simply add the phrase, "the presence of any  
9 synthetic at significant levels and  
10 specifically added as an ingredient."

11 The insignificant significant  
12 issue I know you're discussing and I've worked  
13 on it as well. It's part of the materials  
14 working group. I think that you're not going  
15 to come up with a number in every case, but I  
16 think it's really about functionality. If  
17 that material is there at an insignificant  
18 level and is not doing anything but was part  
19 of the process of getting us a natural  
20 material, then it's insignificant.

21 Next slide, please. Regarding  
22 inert ingredients. I have registered

1 pesticides. I have manufactured biologicals  
2 and botanicals in a past life back in '95. I  
3 stopped doing that but bottom line is that  
4 it's a complicated process. It's very  
5 complicated to get a registration through EPA.

6 I think that your current proposal  
7 is unworkable. There has been discussion and  
8 presentations about that. There have been  
9 several suggestions that are good suggestions  
10 that you've heard from presenters and in  
11 public comment. I think cooperating with EPA  
12 on the review of the merits is critical,  
13 number one.

14 And number two, I think the EPA's  
15 newest proposal for full disclosure of all  
16 inerts is good for everybody but I don't think  
17 we should get ahead of the curve, meaning that  
18 I don't think we should require it at any  
19 faster pace than the EPA is doing. I think we  
20 can retain the list for principle by  
21 referencing the inerts allowed in 25(b) and  
22 the inerts on EPA's list 180.950.



1                   Next slide, please. That's just  
2                   about Wolf DiMatteo. I'm open for questions.

3                   CHAIRPERSON GIACOMINI: Questions  
4                   from the Board. Katrina.

5                   MS. HEINZE: This is not a  
6                   question but a clarification. I appreciate  
7                   the detailed reading of our addendum.  
8                   Unfortunately page 9 is actually not part of  
9                   our addendum but it's part of our November  
10                  recommendation.

11                  MR. WOLF: Correct.

12                  MS. HEINZE: But I do get your  
13                  point, so thank you.

14                  MR. WOLF: Thank you for pointing  
15                  that out. I should have clarified that. I  
16                  would say that is a good example of this whole  
17                  process that the perfect is not the enemy of  
18                  the good and I quote from the Deputy Secretary  
19                  when I say that. In this whole process we  
20                  need to be protecting the long-term overview,  
21                  that everything fits together.

22                  MS. HEINZE: I appreciate your

1        comments. Thank you.

2                    MR. WOLF: Thank you.

3                    CHAIRPERSON GIACOMINI: John.

4                    MR. FOSTER: It's a real question  
5        this time.

6                    CHAIRPERSON GIACOMINI: Good.

7                    MR. FOSTER: Bill, what are some  
8        of the examples of materials that you feel  
9        being -- the natural materials you fear are  
10       being lost?

11                   MR. WOLF: Well, I'll give you  
12       four examples. One, in mine mineral  
13       processing ionic bonds are broken and put into  
14       water and then recollected. In fact, that's  
15       how salt is produced.

16                   There are a number of mine  
17       minerals that are produced that way that would  
18       end up technically being synthetic if you  
19       said, "Well, was the chemical bond broken?"  
20       Salt would be considered -- most formulations  
21       of salt would be considered synthetic under  
22       that definition of chemical.

1                   That's why I go back to, was it a  
2 manmade compound? And I think you have  
3 captured that in talking about did it  
4 represent its original material and intention.  
5 That's why I've said you've made real progress  
6 in clarifying that gap. We talked about those  
7 examples last time.

8                   The second one is about compost  
9 and this one makes me very nervous because  
10 there is a number of materials going into  
11 compost, especially food waste materials that  
12 contain synthetic materials in the process, or  
13 synthetics that are byproducts or even  
14 products of food.

15                   Does that, therefore, make that  
16 compost synthetic? That was not, in my  
17 opinion, our intent in developing the organic  
18 principles. So you've got manure, you've got  
19 compost, you've got food waste. I think the  
20 conversation about corn steep liquor fits the  
21 same conversation. If you drill down and say  
22 was the bond broken, where was it broken, it

1       couldn't have been broken in the soluble part  
2       of the corn.

3                       There's no way, because what  
4       happens with that process in terms of S02 is  
5       that it's absorbed by the corn and there is an  
6       error in the presentation that was made on the  
7       website now because that flow chart is wrong  
8       because it says that the corn mash was  
9       produced before the corn steep liquor was  
10      removed. That's not the case. In other  
11      words, we've got to really be careful where we  
12      go here. Manure is the same way.

13                      Manure from conventional farms is  
14      currently being used and I would love to see  
15      a time in the future where we only use manure  
16      from organic farms. We're not there yet but  
17      right now, manure from conventional farms  
18      contains, by their very character, synthetics.  
19      Those are a few examples.

20                      CHAIRPERSON GIACOMINI: Katrina.

21                      MS. HEINZE: Sorry, Dan. Have you  
22      had a chance to think about the new language

1 that you presented this morning?

2 MR. WOLF: I heard it. I read it.  
3 I liked your intention. I don't fully  
4 understand it. I would like to see it. I  
5 wish it was a handout.

6 MS. HEINZE: Sorry about that.

7 MR. WOLF: I'm sorry about that.

8 MS. HEINZE: I know there are some  
9 people in the audience who have it on their  
10 computers now.

11 MR. WOLF: Right.

12 MS. HEINZE: Perhaps you could ask  
13 one of them for it.

14 MR. WOLF: I will look --

15 MS. HEINZE: It would be great if  
16 you could think about it.

17 MR. WOLF: I will look at it and  
18 I'll be here tomorrow.

19 MS. HEINZE: Thank you.

20 MR. WOLF: Thank you.

21 CHAIRPERSON GIACOMINI: Thank you.

22 MR. WOLF: Thank you all.

1                   CHAIRPERSON GIACOMINI: Richard  
2 Holt, Stephen Colbert, Walt Talarek.

3                   MR. HOLT: Good afternoon and  
4 thank you for the chance to come and speak  
5 today. My comments are a bit of a follow-on  
6 to what I just heard, especially talking about  
7 significant and insignificant levels and also  
8 a number of comments I've heard today about  
9 list 4 and being incomplete and the problems  
10 that creates.

11                   I think I've got a real world  
12 example to talk about. Beginning, my name is  
13 Rick Holt. I'm here on behalf of the DuPont  
14 Company. My comments today, and those of my  
15 colleague to follow, are intended to  
16 respectfully ask the Board to include the  
17 review and hopefully approval of two key  
18 inerts on the agenda in time for your next  
19 meeting in the fall.

20                   These inerts are tetramethyldecyne  
21 diol, or TMDD, and ethylene glycol. Both are  
22 extremely low-level antifoam agents that are

1 essential components of the Kocide copper  
2 formulation. Although we at DuPont looked, we  
3 were unable to find any nonsynthetic  
4 replacements for it.

5 Kocide, as I'm sure many of you  
6 know, is the low use-rate copper fungicide and  
7 it has been a staple in organic production for  
8 many, many years. Unfortunately, it's been  
9 unavailable for the last couple of growing  
10 seasons while awaiting approval by the Board  
11 of these two inerts, both of which were caught  
12 in this catch-22 that we've been talking about  
13 with EPA relative to list 4.

14 Both inerts were, in fact,  
15 approved by EPA have tolerance exemptions and  
16 would have been included in the list 4 if, in  
17 fact, list 4 had ever been updated which, as  
18 we know, never occurred.

19 As described in the procedural  
20 rules for this Board, the DuPont company did  
21 prepare and submit petitions for both inerts  
22 in 2008. I believe the crop committee

1 received the technical views completed last  
2 year. Both inerts were, it was my  
3 understanding, originally intended for a  
4 review at this meeting but were superseded by  
5 other issues on the agenda.

6 If time had allowed, I would spend  
7 some time covering the toxicity and the fate  
8 aspects of these ingredients nor is this the  
9 venue for doing that. However, in your  
10 deliberations in the fall if, in fact, you do  
11 review this, which I hope you do, I would  
12 kindly ask that you factor in this one  
13 important factor when you do that.

14 I'm showing on this slide here  
15 both of these inerts are in the Kocide  
16 formulation at extremely low levels. They are  
17 there at a 10th of a percent of the Kocide  
18 formula which gives you an inert rate of .001  
19 pound per acre. That translates to .45 grams  
20 per acre if you look at it on an in-use  
21 example.

22 If you were to assume no



1 degradation, or very little degradation, you  
2 would be hard-pressed to actually find any of  
3 this material in the environment. I'm  
4 personally a very visual person so we have a  
5 next slide; this sort of puts it into  
6 perspective.

7           You've got two vials here, one on  
8 the left there with sand and the other with  
9 colored water both at a half a gram. You can  
10 imagine spreading this material over an acre  
11 of land. You're looking at what I interpret  
12 as talking about insignificant levels and  
13 that's what we're looking at here.

14           I would ask in any review that  
15 when you're looking at risk that you factor in  
16 your calculus the real world exposure that  
17 we're talking about here. We're not talking  
18 about very high levels.

19           To conclude my presentation, I  
20 also have a number of, if I could, letters of  
21 support we received from our growers. This  
22 first one is from California, Oxnard, stating

1 that "we need Kocide available for organic  
2 production because it has the lowest rate of  
3 copper and is the most environmentally  
4 friendly copper choice on the market."

5 This is from Tehema up the road  
6 here. It says "without Kocide available our  
7 yields would go down due to less packaging  
8 control and less resistance to management."

9 The third from the Florida Fruit and Vegetable  
10 Association down with Dan Botts and that crew  
11 stating that "FFVA strongly endorses the  
12 organic registration and reinstatement of  
13 preservation efforts and placement of Kocide  
14 back onto the OMRI list of approved products."

15 Finally, the last from Frank's  
16 Crop Watch stating that "Kocide products offer  
17 organic growers superior copper fungicide in  
18 comparison to the available alternatives."

19 With that, I would like to say  
20 thank you for the opportunity to talk and,  
21 again, restate my plea that at the next  
22 meeting in the fall that you take on the

1 review of these and hopefully approve at least  
2 two inerts. Thank you.

3 CHAIRPERSON GIACOMINI: Any  
4 questions? Thank you.

5 Stephen Colbert, Walt Talarek and  
6 Cam Wilson.

7 MR. COLBERT: First off, I would  
8 like to thank the Board for commenting on the  
9 Colbert report and I have a lot of questions  
10 for you. And it is Colbert, it's not Colbert.  
11 I'm the product development representative for  
12 DuPont here in Northern California so I do a  
13 lot of the testing and working with growers  
14 and customers with our products.

15 Of course, Kocide is a very large  
16 product for us. Copper fungicides are an  
17 essential part of many programs for disease  
18 control. As Rick previously mentioned, Kocide  
19 was standard for many years for organic  
20 production with some of our older products.  
21 I would like to get into what benefit it is to  
22 your growers to have Kocide on the approved

1 list.

2 Go ahead and we'll go to the first  
3 slide there. The Kocide brand has been around  
4 for quite a long time. It's the market leader  
5 in the United States. It is the most  
6 available product for growers to use of a  
7 copper hydroxide or copper fungicide.

8 DuPont is committed to  
9 environmental stewardship. We do have  
10 technical assistance. We do awards for  
11 various programs. We offer quality products  
12 that are very, very high standards. As it  
13 shows there, we do use recycled copper. We no  
14 longer mine it. At one time, Kocide was  
15 Kennecott Corporation, Kennecott Mines. That  
16 is no longer the case.

17 It does meet the highest standards  
18 for purity, for world organizations as well as  
19 for the United States. We pioneered the  
20 process of using less and less copper per  
21 acre.

22 There was vision within the

1 company at one time that said we are going to  
2 run into regulatory environment in the near  
3 future and cost that is going to mean we have  
4 to use less copper which provides an  
5 environmental benefit as well. We do market  
6 now products that you can use at much lower  
7 copper use rates than you could at one time.  
8 Therefore, the load in the environment is  
9 reduced.

10 Go ahead. A little bit of  
11 background on how copper works. Copper itself  
12 is a metal. You could throw all the copper  
13 wire you want at a disease and it wouldn't do  
14 anything. It has to be formulated in such a  
15 process that it can be released as an ion in  
16 water. You get the copper ion. That is what  
17 does all the work. For most formulations  
18 that's going to be in the low parts, one part  
19 per million, five parts per million in the  
20 water.

21 At any rate, the way to get around the  
22 fact that you could only get so much copper

1       into the water as a bioavailable or active ion  
2       was to develop new patented formulations that  
3       included certain ingredients that allowed you  
4       to take that to more like 100 parts per  
5       million. Therefore, you would have more  
6       active copper. You could do more disease  
7       control and use less total copper.

8               This has been pushed and pushed  
9       and pushed over the years and now we have  
10      Kocide 3000. You're actually using, let's  
11      say, for example, in grapes where you would  
12      have used two pounds of our older formulations  
13      at a 50 percent product, 50 percent copper,  
14      you would now use one pound that's 30 percent  
15      copper. So you are using 25, 30 percent of  
16      the total metallic copper that you want to  
17      use.

18             The other thing is that we provide  
19      the best formulations out there, the lowest  
20      foaming, the best mixing, the best  
21      sprayability. That's why we use the antifoam  
22      agents in there is, in the manufacturing use

1 of the product you don't want to have this  
2 much foam in your tank when you're spraying.  
3 It makes it impossible to spray.

4 Again, we would like to be  
5 organically certified. We strive to be there.  
6 We've been working on this for a couple of  
7 years now and would really appreciate your  
8 considering us and getting us onto the next  
9 meeting's agenda. Thank you very much.

10 CHAIRPERSON GIACOMINI: Jay.

11 MR. FELDMAN: Thank you for your  
12 comment. Do you guys have a label approved by  
13 EPA with these inerts in the Kocide product?

14 MR. COLBERT: The current product  
15 is labeled, and has been out for a few years  
16 and it includes these inerts which were  
17 reviewed from the one list.

18 MR. FELDMAN: So this is a basic  
19 section 3 registration, it's standard  
20 registration?

21 MR. COLBERT: Right. It's done  
22 and it's marketed worldwide and in a few years

1 in the United States as well.

2 MR. FELDMAN: Right. Thank you.

3 CHAIRPERSON GIACOMINI: Thank you.

4 Okay. I think, in the essence of time, we  
5 still have about a third of the list to go,  
6 but we'll put this, maybe -- but we will try  
7 to continue to restrict our questions but I'm  
8 going to ask a little help from yourselves  
9 also. Any of you that would like to be held  
10 to a three-minute minimum tell us when you  
11 come up and we'll set that clock. That's is  
12 yours. No one is expected to do that.

13 MR. TALAREK: Good afternoon. My  
14 name is Walt Talarek. I'm here today  
15 representing W. Neudorff GmbH KG, or otherwise  
16 the Neudorff Company.

17 MR. SMILLIE: You're the guy.

18 MR. TALAREK: I must be.

19 MR. SMILLIE: All those petitions.

20 MR. TALAREK: Right. There's a  
21 lot of science that we submitted to you in  
22 rebuttal of the Steptoe and Johnson petition



1 to delist. I'm here primarily to encourage  
2 you to review the science and our evaluation  
3 of the science.

4 In any event, Neudorff is a small  
5 150-year-old company. It's family-owned,  
6 based in Emmerthal, Germany. The company is  
7 dedicated to providing reduced-risk pesticides  
8 such as those containing ferric phosphate as  
9 well as biopesticides.

10 Neudorff is a producer and  
11 registrant of a slug bait containing ferric  
12 phosphate as the sole active ingredient. As  
13 you know, or may know, ferric phosphate occurs  
14 naturally in the environment. However,  
15 because of its lack of availability large  
16 quantities are produced for Neudorff and for  
17 its use in slug and snail bait.

18 In the US, as you guys know,  
19 ferric phosphate is currently allowed by the  
20 USDA at the regulation at 7 CFR Section  
21 205.601(h). In other words, it's listed on  
22 the National List. I am here today to

1 encourage you to continue the listing of  
2 ferric phosphate as a molluscicide on the  
3 National List.

4 Throughout the world to date  
5 ferric phosphate's uses as a molluscicide for  
6 organic production has been approved by the  
7 Codex Alimentarius Commission, IFOAM, and the  
8 European Commission. Currently, Neudorff slug  
9 and snail bait is registered for organic  
10 production in the US by the US EPA as well as  
11 throughout the EC countries.

12 In the US, in our slug bait, I can  
13 tell you that all the inert ingredients are on  
14 EPA's list 4. Furthermore, the OMRI has  
15 certified Neudorff slug and snail bait for  
16 organic production here in the US

17 In Europe, Neudorff slug bait  
18 containing ferric phosphate has replaced  
19 metaldehyde slug baits for organic production.  
20 That occurred in approximately 2006. Neudorff  
21 believes that ferric phosphate continues to  
22 meet the OFPA criteria for listing as a

1 substance for organic production.

2 We did submit, as you know, to the  
3 docket a substantial list of comments this  
4 March. Also, we submitted to the docket our  
5 response to the Neudorff petition which we  
6 submitted in hard copy in January of this year  
7 to the Board.

8 Ferric phosphate is the only  
9 active ingredient in Neudorff slug and snail  
10 bait. We have submitted scientific studies  
11 supporting that statement to the docket. And  
12 actually, it's appended to our response to the  
13 Steptoe petition.

14 Ferric phosphate by itself is  
15 active as an ingested poison for mollusks.  
16 However, because it needs to be ingested for  
17 activity, carriers such as common foodstuffs  
18 and dispersants are used to encourage slugs  
19 and snails to eat the bait and to assist with  
20 the bait's digestion and absorption in the  
21 slug's gut.

22 Ferric phosphate does not react

1 with EDTA during the manufacture of Neudorff's  
2 slug and snail bait to form iron EDTA as an  
3 active ingredient. I think that is a key  
4 issue for you. I saw that in the  
5 recommendation. Again, we have submitted  
6 documentation supporting that statement and we  
7 encourage you to review the science behind  
8 that statement.

9 Ferric phosphate, I say this  
10 emphatically, has no unacceptable toxic  
11 effects on earthworms. Again, we submitted  
12 the scientific documentation supporting that  
13 statement. As a matter of fact, the study  
14 submitted by Steptoe has been critiqued.

15 If you look at the full 14 days  
16 worth of study, you'll see that statement I  
17 just made that there are no unacceptable toxic  
18 effects on earthworms is correct unlike the  
19 statement based on the truncated 10-day  
20 comment by Steptoe. Thank you.

21 CHAIRPERSON GIACOMINI: Questions?  
22 Joe.

1                   MR. SMILLIE: First of all, let me  
2 apologize for my little outburst. It was not  
3 meant as a disparagement whatsoever but that  
4 was the most voluminous amount of scientific  
5 testimony that I have ever had the occasion to  
6 have to read through. Certainly, you have  
7 definitely made your case. Again, I  
8 apologize.

9                   When we first got to the  
10 regulations I thought there was a mistake  
11 because this ferric phosphate thing kept  
12 coming up again. I said, "What is going on?"  
13 I realize that each of those are a separate  
14 submission and it was truly voluminous. I  
15 think it was a record.

16                   MR. TALAREK: I apologize because  
17 the [www.regulations.gov](http://www.regulations.gov) website only accepts  
18 10 megabytes worth of data in a comment. Now,  
19 some of these studies run 60, 70 pages long so  
20 they had to be divided up into three or four  
21 parts. I apologize for that. My daughter did  
22 help out so it wasn't that much of a burden.

1                   CHAIRPERSON GIACOMINI: Jay, did  
2 you have a question?

3                   MR. FELDMAN: You say on page 2  
4 that ferric phosphate, when used, does not  
5 cause unreasonable adverse impacts on humans  
6 or the environment. As you know, that's not  
7 the Organic Food Production Act standard for  
8 safety so I'm wondering what is reasonable or  
9 what is unreasonable in this context?

10                  MR. TALAREK: I probably took that  
11 from my EPA jargon.

12                  MR. FELDMAN: Exactly.

13                  MR. TALAREK: Normally, I do EPA  
14 registrations.

15                  MR. FELDMAN: Okay. I was  
16 wondering about that.

17                  MR. TALAREK: Okay. Basically, if  
18 you look at the tox database for ferric  
19 phosphate you see that the acute tox is  
20 toxicity level 4 for the acutes, subchronics  
21 and chronics. There are no adverse affects.

22                  MR. FELDMAN: Okay. So you think

1 it exceeds the standard required.

2 MR. TALAREK: Yes. Absolutely.

3 Thank you.

4 CHAIRPERSON GIACOMINI: Thank you.

5 Okay. Cam Wilson. Then, on the suggestion of  
6 the speaker earlier today, since that is the  
7 last one listed here for this subject, I think  
8 then we will take a break approaching the  
9 5:00. After that will be Lyle Wong and Leslie  
10 Zuck.

11 MR. WILSON: Thank you, NOSB.  
12 Walt is responsible for the submission so  
13 don't shoot the messenger. I will continue  
14 where Walt left off on the discussion about  
15 ferric phosphate to keep it on the National  
16 List and to refute some of the claims that  
17 were made by Steptoe.

18 My name is Cam Wilson. I'm the  
19 Chief Technical Officer for Neudorff North  
20 America and I'm obviously here to defend  
21 ferric phosphate and keep it on the National  
22 List and let me to tell you the reasons why.

1                   First and foremost, the need.  
2           Organic growers, as many people have spoken  
3           earlier, need an organic slug bait, and ferric  
4           phosphate satisfies that need. Strawberry  
5           growers, artichoke growers, hops growers,  
6           citrus growers, in this area in particular,  
7           need an organic slug bait.

8                   Also, and many of you may not be  
9           aware of this, but those of you from the east  
10          that are involved in the dairy industry there  
11          is a vector for liver fluke and it's a snail.

12                   Currently organic dairy farmers do  
13          not have control for that snail outside of  
14          Sluggo, which is the commercial name for the  
15          product, the ferric phosphate bait. Not only  
16          is it crop growers but it's also dairy farmers  
17          require something like this product.

18                   The alternate methods, such as  
19          copper banding and hand picking, are not  
20          practical. I can't speak as a grower but I  
21          think the growers here if they were told to  
22          speak on that issue would become very



1 passionate about it. In the past ducks were  
2 recommended and we all know the issue of ducks  
3 in organic production. It's just really not  
4 practical, once more.

5 Earlier a speaker mentioned, the  
6 speaker for Wild Farm Alliance, and it was  
7 very interesting because we are currently  
8 working on a project with the US Army in  
9 Hawaii that is reforesting wild plants and  
10 they have a problem with a slug and they want  
11 an organic product. So without Sluggo that  
12 project would not go forward.

13 Just as a reminder, five years ago  
14 I was here, or in D.C., and petitioned to put  
15 ferric phosphate on the National List. As a  
16 result of the TAP review the NOSB voted 10 to  
17 zero to add ferric phosphate to the National  
18 List. No one voted against putting ferric  
19 phosphate on the National List.

20 I believe that still stands true  
21 today, that the product has minimal impact on  
22 humans and the environment, has no synthetic

1 substances available for mollusk control at  
2 the moment and the material is compatible with  
3 organic production practices.

4 The product is recognized, as Walt  
5 mentioned, by IFOAM as an active in organic  
6 production and by the European Commission.  
7 Throughout the world, everywhere where  
8 Neudorff, our company, has registered our slug  
9 bait, ferric phosphate is recognized as the  
10 active ingredient.

11 In total, and it is a list that  
12 has been provided to you on that website,  
13 approximately 22 countries have registered the  
14 Neudorff slug and snail bait with the active  
15 ingredient ferric phosphate.

16 I want to talk now about the  
17 Steptoe petition. Many of you may not be  
18 aware of this but that was competitor-based.  
19 Where that came from, Steptoe, was from a  
20 competitor of the ferric phosphate baits so  
21 that's the origin of the petition to remove.  
22 As far as I understand, no one in the organic

1 community has petitioned to remove ferric  
2 phosphate from the National List.

3 I'm going to go right to the  
4 conclusion because I think it summarizes  
5 things nicely. Just as a reminder, EDTA is a  
6 list 4 inert. All the inerts in the Neudorff  
7 slug and snail bait are list 4 and are  
8 acceptable by the NOP standards as of today.

9 In summary, organic farmers need  
10 an effective slug and snail bait. We have  
11 proven with all the submission in every  
12 country in the world that ferric phosphate is  
13 the active ingredient in the Neudorff bait.

14 As I mentioned, all the inerts are  
15 on the August 2004 list 4. As recent as  
16 January 2010, the EPA staff approved the  
17 Neudorff label with the NOP and OMRI  
18 confirming that the product is NOP compliant.  
19 The active ingredient is ferric phosphate.  
20 Just to repeat what Walt said, ferric  
21 phosphate slug and snail baits are not harmful  
22 to earthworms, as some may have led you to

1 believe.

2 Based on the facts I have provided  
3 I ask you to keep ferric phosphate on the  
4 National List. Any questions?

5 CHAIRPERSON GIACOMINI: Jay.

6 MR. FELDMAN: Thank you for your  
7 comment. Are you able, willing, or whatever  
8 to disclose the inert ingredients?

9 MR. WILSON: It has been provided  
10 to you.

11 MR. FELDMAN: It's provided to the  
12 Board?

13 MR. WILSON: Yes. In fact, it was  
14 provided in the Steptoe petition to remove it.

15 MR. FELDMAN: Okay. So beyond the  
16 EDTA and the EDDS there are other inert  
17 ingredients?

18 MR. WILSON: Flour and sugar.

19 MR. FELDMAN: Okay. Thank you.

20 MR. WILSON: Any other questions?

21 CHAIRPERSON GIACOMINI: No, I  
22 think that's it.

1 MR. WILSON: Thank you.

2 MR. TALAREK: There no EDDS in the  
3 US as slug bait. That is an alternative  
4 substance that is used elsewhere in the world,  
5 as a substitute for EDTA.

6 CHAIRPERSON GIACOMINI: Thank you.  
7 Okay. We're going to take a break. Next up  
8 will be Lyle Wong, Leslie Zuck. Does  
9 Katherine win the award for the first one to  
10 give up her space in the case of time? Thank  
11 you, Katherine. Followed by Tom Hutcheson.  
12 Again, let's go 10 after the hour on that  
13 clock. And Board members, please try to be  
14 prompt.

15 (Whereupon, the above-entitled  
16 matter went off the record at 4:59 p.m. and  
17 resumed at 5:11 p.m.)

18 CHAIRPERSON GIACOMINI: First up  
19 is Lyle Wong, Leslie Zuck, and Tom Hutcheson.

20 Mr. Wong, we needed eight seated  
21 and as soon as we have that, you can begin.  
22 Go ahead, sir.

1 MR. WONG: Members of the Board,  
2 my name is Lyle Wong. I am head of the Plant  
3 Industry Division of the Hawaii Department of  
4 Agriculture.

5 The Hawaii Department of  
6 Agriculture recently submitted a petition to  
7 USDA National Organic Program.

8 CHAIRPERSON GIACOMINI: Excuse me.  
9 Could people please take conversations  
10 outside? We're back in session. Could  
11 someone please close that door also so we can  
12 hold the noise down? Thank you.

13 MR. WONG: The Hawaii Department  
14 of Ag recently submitted a petition to USDA  
15 National Organic Program requesting the  
16 listing of formic acid as an approved  
17 substance for organic handling and processing.

18 This petition was submitted as a  
19 result of the recent introduction of the  
20 varroa mite into Hawaii and the need for an  
21 effective chemical control for this pest for  
22 the survival of organic honey production in

1 the State of Hawaii.

2 This is the first submittal of a  
3 petition by the Hawaii Department of Ag for a  
4 listing of a substance as organic. USDA NOP  
5 has completed its preliminary review of the  
6 document for completeness and we are hopeful  
7 that the document and our request for a  
8 listing can now proceed through the vetting  
9 process established by the National Organic  
10 Program.

11 From a discussion with USDA, we  
12 understand that the process could take  
13 possibly 18 to 24 months to complete, assuming  
14 all goes well for a determination. As author  
15 of the petition, I'm hopeful that a  
16 determination will be positive for listing at  
17 the earliest possible date.

18 To my comments I've attached a  
19 letter from Philip Grad, an organic beekeeper  
20 in Hawaii to the Honorable Dennis Cardoza,  
21 Chairman of the US House Committee on  
22 Agriculture, seeking his assistance to have a

1 temporary but immediately ruling that would  
2 permit US beekeepers to control parasitic  
3 mites, including the varroa mite, with formic  
4 acid without jeopardizing their honey organic  
5 certification.

6 This thoughtful letter from an  
7 organic beekeeper in Hawaii goes on to state  
8 that under the US/Canadian Organic Equivalency  
9 Agreement, Canadian beekeepers using formic  
10 acid can export their honey to the United  
11 States and label and sell it as organic using  
12 either the Canadian or US organic seal.  
13 However, US honey producers using formic acid  
14 are not permitted to label their honey as  
15 organic.

16 He adds further that other  
17 organizations and countries, such as the  
18 European Union and New Zealand, also permit  
19 the use of formic acid in the production of  
20 organic honey.

21 The Hawaii Department of Ag  
22 strongly supports this request for a temporary



1 ruling to allow the use of formic acid for  
2 mite control in the United States, which would  
3 allow the time needed by the National Organic  
4 Standards Board to develop a permanent  
5 position regarding position without  
6 disadvantaging US beekeepers.

7 For beekeepers in Hawaii, a delay  
8 in ruling of two years will, in all  
9 likelihood, see the collapse of the organic  
10 honey production in Hawaii to the varroa mite  
11 and to the absence of a control method that  
12 other producers have the privilege of using as  
13 organic not only in their producing area but  
14 also for distribution of product into the  
15 United States under an international  
16 agreement.

17 This would be a disaster not only  
18 for the producers in Hawaii, which are all  
19 small rural families, but for Hawaii  
20 agriculture as well. From worldwide  
21 experience with the varroa mite, Hawaii can  
22 expect the loss of the vast majority of its

1 many thousands of feral hives that supply bees  
2 with crop pollination throughout the Hawaiian  
3 Islands.

4 The Hawaii Depart of Ag and  
5 growers have been struggling with this reality  
6 for the past two years. It is likely that a  
7 number of small traditional beekeepers will  
8 step up production of managed hives with  
9 pesticide treatment to control the varroa mite  
10 for pollination services.

11 The reality is, however, that the  
12 only source of bees in Hawaii in any  
13 significant numbers at this time is through  
14 the organic honey producers, by far the  
15 largest beekeepers in the state.

16 The largest organic beekeeper in  
17 Hawaii is, in all likelihood, the largest  
18 organic honey producer in the United States.  
19 The loss of this sector of the industry to the  
20 varroa mite in Hawaii in the absence of an  
21 effective control would deprive the US market  
22 of certified honey previously available from

1 major sources in Hawaii and will vastly  
2 complicate how Hawaii is to transition into a  
3 system of organic production entirely  
4 dependent on managed hives throughout the  
5 Hawaiian chain, a very serious concern and  
6 problem for the State of Hawaii and the Hawaii  
7 Department of Ag.

8           Organic honey production is an  
9 important industry in Hawaii and an essential  
10 industry more so than ever to Hawaii at this  
11 point in time. I am not sufficiently familiar  
12 with organic -- the national organic standards  
13 to say whether the law provides for what is  
14 being requested but as Chief of the Pesticides  
15 Branch as well, I know that the provisions are  
16 available under the Federal Insecticide  
17 Fungicide Act to address true emergencies.  
18 The risk-based standard of FIFRA provides for  
19 --

20           CHAIRPERSON GIACOMINI: Wrap it up  
21 please.

22           MR. WONG: -- yes -- emergency

1 exemptions which are, hopefully, likewise  
2 available through a national organic standard.

3 Thank you.

4 CHAIRPERSON GIACOMINI: Any  
5 questions? Tina?

6 SECRETARY ELLOR: Don't growl at  
7 me, Dan.

8 CHAIRPERSON GIACOMINI: It wasn't  
9 a growl.

10 SECRETARY ELLOR: I have a  
11 question more for the program. And we talked  
12 about this a little bit this morning and with  
13 Katrina.

14 Is there an option within the rule  
15 that would allow for an emergency approval?

16 MR. WONG: Well, there is a  
17 temporary variance but it is not relevant for  
18 materials. There is emergency pest and  
19 disease treatment under I think it is 671,  
20 which allows the use of a prohibited substance  
21 under an emergency basis. But the products  
22 that are treated cannot be sold as organic.

1 But you don't lose the certification but you  
2 would lose the market.

3 CHAIRPERSON GIACOMINI: Jay?

4 MEMBER FELDMAN: I'll get this by  
5 the end of the meeting. Thank you.

6 Maybe this is a question for the  
7 program in terms of certification of organic  
8 honey production, where is that? Where do we  
9 find that? And is that just -- I'm -- I mean  
10 there are two elements to this. Obviously one  
11 is the care of the hives, the management of  
12 the hives.

13 But there's also issues around  
14 foraging and in conventional fields and  
15 conventional areas where there are flowering  
16 plants and whatever. So how has the program  
17 dealt with this, the labeling of organic  
18 honey?

19 MR. McEVOY: Well, it is a very  
20 interesting dilemma because there are not  
21 specific standards on organic honey  
22 production.

1                   So there is an NOSB recommendation  
2                   on apiculture. But if you look in the  
3                   National Organic Program regulations, there's  
4                   nothing specific to bee production.

5                   MEMBER FELDMAN: So when I go to  
6                   my co-op and I see organic honey with the USDA  
7                   seal --

8                   MR. McEVOY: It is certified by an  
9                   accredited certifier. And it is certified  
10                  under their best work to verify that it meets  
11                  the national organic standards. So I'm not  
12                  familiar with exactly what the certifiers are  
13                  doing. But these are accredited certifiers  
14                  that are following the national organic  
15                  standards.

16                  MEMBER FELDMAN: Maybe you can  
17                  help with this. Is this product registered by  
18                  EPA?

19                  MR. WONG: Yes, it is. Formic  
20                  acid is registered.

21                  MEMBER FELDMAN: What is the  
22                  product name that --

1                   MR. WONG:  It's Mite-Away.  There  
2                   is a Mite-Away 2 that has been around for  
3                   quite a while but we can't use it in Hawaii  
4                   because of temperature restrictions.  So to  
5                   get formic acid for our beekeepers, our  
6                   traditional beekeepers, we have registered a  
7                   24C that has no temperature upper limit and a  
8                   shorter exposure period.

9                   MEMBER FELDMAN:  So it is a  
10                  special local needs permit just in Hawaii and  
11                  other states?

12                  MR. WONG:  Yes.  Other states are  
13                  going to get registrations for a section --  
14                  for 24C and it is probably going to get a  
15                  Section 3, too.

16                  MEMBER FELDMAN:  Okay.  And do we  
17                  know the inert ingredients in the product?

18                  MR. WONG:  That we have provided  
19                  to USDA through the -- but it has confidential  
20                  business information.  There's nothing  
21                  particular unusual about the inerts.

22                  MEMBER FELDMAN:  Okay.  So the

1 dilemma is we don't really, as a Board, have  
2 a standard for organic production. The  
3 implication here is we are being asked to  
4 allow a material that would presumably be used  
5 -- knowingly be used to put a label on a  
6 product for which we don't have a process that  
7 we have approved.

8 So it sort of puts us in a bind, I  
9 think, as a Board, doesn't it, to essentially  
10 imply approval of a label, and presumably a  
11 process for management of hives, that we  
12 haven't really approved or at least the  
13 materials haven't been approved.

14 MR. McEVOY: Well, you have  
15 recommendations that you have approved. You  
16 have final recommendations on apiculture. And  
17 so a petition for something that is specific  
18 to apiculture could be a relevant thing for  
19 you to consider. I don't see that as a  
20 conflict.

21 MEMBER FELDMAN: Okay.

22 MR. McEVOY: You already have



1 recommendations. And it complements the  
2 recommendation or it could complement the  
3 recommendation.

4 MEMBER FELDMAN: Okay. So just so  
5 folk know, what we have here is a situation of  
6 a chemical that has not been registered by  
7 EPA.

8 MR. WONG: No.

9 MEMBER FELDMAN: The registrant is  
10 getting what is called a 24C registration,  
11 which is a Special Local Need permit.

12 MR. WONG: No, it is registered.

13 MEMBER FELDMAN: I thought you  
14 said it was pending, a Section 3.

15 MR. WONG: No, no, no.

16 MEMBER FELDMAN: I'm sorry.

17 MR. WONG: Formic acid is  
18 registered as a mitacide by US EPA, Mite-Away  
19 2.

20 And what we did was we issued a  
21 24C registration to provide for the use of  
22 formic acid under local conditions, which is

1 the temperature regimes that we have in  
2 Hawaii. So that formic acid end-use product  
3 is under a 24C specifically for use in Hawaii.

4 But formic acid is approved by US  
5 EPA for varroa mite control throughout the  
6 United States.

7 MEMBER FELDMAN: I don't want to  
8 drag this out but what makes it special in  
9 Hawaii then? Why can't you just go with the  
10 regular Section 3?

11 MR. WONG: Because we can't be  
12 compliant with the label requirements for not  
13 exceeding 82 degrees Fahrenheit over a 21-day  
14 period.

15 MEMBER FELDMAN: I see. Okay.  
16 Thank you.

17 CHAIRPERSON GIACOMINI: Have you  
18 submitted a petition for this to the program?

19 MR. WONG: Yes. And EPA -- I mean  
20 USDA has it. And they are looking at it for  
21 completeness right now. And I guess it will  
22 come to the Board.

1 CHAIRPERSON GIACOMINI: Okay.

2 Katrina?

3 MEMBER HEINZE: This is actually a  
4 question for you, Dan. Once we get that, this  
5 is a livestock material, right? Because it's  
6 used for pest management on the bees?

7 CHAIRPERSON GIACOMINI: It's on  
8 the bees themselves I would think.

9 MEMBER HEINZE: As opposed to a  
10 handling material?

11 CHAIRPERSON GIACOMINI: I would  
12 think so, yes.

13 MR. WONG: Correct.

14 MEMBER HEINZE: Okay. I just  
15 wanted to clarify. Little fuzzy for me.

16 MR. WONG: Sucrose esters are  
17 approved for varroa mite control. And so  
18 that's elicited.

19 And the formic acid is -- when you  
20 put it in the hive, it's there as an acid  
21 vapor from a pad, the delivery system. And  
22 bees happen to be very tolerant of formic

1 acid, possibly because it's in the stinger.

2 And it's a natural product of honey, too,

3 formic acid.

4 CHAIRPERSON GIACOMINI: Any other  
5 questions?

6 MS. FRANCES: Just a comment.

7 Sucrose octanoate esters was looked at both in  
8 livestock and crops because the bees are in  
9 the field. That was looked at in crops, too,  
10 just so that it was kind of covering the  
11 bases.

12 CHAIRPERSON GIACOMINI: Okay.

13 MEMBER FELDMAN: So can I ask  
14 Miles another question? If they use the  
15 special provision, they couldn't sell the crop  
16 as organic but they could return to organic  
17 production immediately?

18 MR. McEVOY: You're talking about  
19 671?

20 MEMBER FELDMAN: 671.

21 MR. McEVOY: I'd have to read 671  
22 and so I can get you that answer.

1 MEMBER FELDMAN: Okay.

2 CHAIRPERSON GIACOMINI: Okay. I  
3 think this Board would need to work through  
4 the petition process. You've done that. As  
5 soon as it comes to us from the program, the  
6 other issues I would suggest you continue to  
7 work with the program on whether there is any  
8 kind of a "variance" and proceed from there.  
9 And hopefully we'll be able to come to some  
10 conclusion.

11 MR. WONG: Thank you.

12 CHAIRPERSON GIACOMINI: Okay. Is  
13 Leslie not here? Okay. Thank you, Leslie.

14 Tom Hutcheson, Patti Bursten-  
15 Deutch, and Pat Kane. Not here.

16 Jake Lewin? Proceed.

17 MR. HUTCHESON: Good afternoon,  
18 I'm Tom Hutcheson.

19 CHAIRPERSON GIACOMINI: Okay. Oh,  
20 I'm sorry. Pat Kane.

21 MR. HUTCHESON: Okay. Good  
22 afternoon. I'm Tom Hutcheson, Regulatory

1 Analyst for the Organic Trade Association.  
2 OTA, with its democratically-elected board is  
3 the membership business association for  
4 organic agricultural products in North  
5 American. We thank NOSB for the opportunity  
6 to provide comment. Please refer to our  
7 written comments on enclosed operations,  
8 animal healthcare products, and  
9 nanotechnology, as well as fuller discussions  
10 of the items I'll cover here.

11 First on Sunset items, OTA  
12 supports the recommendation for all items  
13 identified for continued use at this meeting.  
14 Unfortunately, items in the documents NOSB has  
15 prepared are not completely consistent with  
16 items published in the two Federal Register  
17 notices.

18 And the three opportunities for  
19 comment have caused some anxiety in the trade  
20 unnecessarily and we hope NOP and NOSB can  
21 collaborate more closely in the future to  
22 avoid confusion.

1                   On List 4 inerts, OTA does not  
2                   support the recommendation of the Crops  
3                   Committee, particularly the suggestion that  
4                   NOSB needs to review all inert ingredient  
5                   components used in current NOP-complaint  
6                   pesticide formulations. This recommendation  
7                   would result in a significant loss of tools  
8                   available to organic growers.

9                   NOSB is not a smaller version of  
10                  EPA for reviewing individual inerts. This  
11                  would result in a large and unnecessary burden  
12                  on NOSB with over 250 currently approved  
13                  unique inerts. NOSB should work with NOP and  
14                  existing technical advisors such as OMRI in  
15                  adjusting to the changed regulatory  
16                  environment rather than trying to stand in for  
17                  EPA.

18                  On methionine, OTA supports the  
19                  recommendation with the following adjustments.  
20                  OTA suggests that the reduction of the allowed  
21                  amount by two pounds per ton applied to layers  
22                  also be applied to pullets, which are not

1 currently treated separately although as  
2 growing chickens, they have higher nutrient  
3 needs and broilers.

4 Broilers, which under the current  
5 proposal could receive five instead of four  
6 pounds per ton, together with pullets, should  
7 be able to receive three pounds per ton of  
8 synthetic methionine per ton instead of two.

9 On stocking rates, OTA requests  
10 that NOSB use the data being gathered by NOP  
11 as part of the US/Canadian Equivalents  
12 Agreement and not take issue on this action  
13 before considering that data.

14 Also, OTA fully supports Deputy  
15 Administrator McEvoy's request that NOSB  
16 recommend clarification that animal living  
17 conditions standards apply throughout the  
18 certification chain until the time of  
19 slaughter.

20 On definitions of materials and  
21 classification, the revised clarification of  
22 chemical change is good and helpful but should



1 apply only to product to be used in producing  
2 a product for human or animal consumption, not  
3 to crop or livestock production inputs.

4 We appreciate the clarification of  
5 the definition of non-agricultural and agree  
6 that an agricultural product should remain  
7 agricultural no matter how it is processed or  
8 what it is combined with. But the new  
9 definition is inconsistent with the range of  
10 products that can be and are currently being  
11 certified under NOP.

12 The current definition of crop as  
13 a plant or part of a plant falls short as  
14 mushrooms and kelp, for example, are not  
15 technically plants.

16 OTA also supports yeast being  
17 agricultural. Any living organism that can be  
18 cultivated or cultured by humans that is  
19 produced from naturally-occurring biological  
20 processes can potentially be certifiable as  
21 organic and be agricultural.

22 Finally, 605 should be revised to

1 require sourcing of commercially available  
2 organic ingredients.

3           For classification, we need  
4 separate review sheets for crop, livestock,  
5 and handling inputs with different questions  
6 posed as applicable. Also non-organic  
7 agricultural ingredients should be allowed to  
8 be included as feed supplements or minor  
9 ingredients in food subject to commercial  
10 unavailability.

11           On inerts in gases, OTA supports  
12 the recommendation as written.

13           On Sunset Review, OTA supports  
14 Option 2B, which we feel does not challenge  
15 the integrity of NOSB's review program. OTA  
16 expects NOSB to review materials as fully as  
17 the Board decides is necessary. Nonetheless,  
18 initial NOSB review and subsequent votes  
19 should indicate that without new information  
20 either from periodic review or public comment,  
21 the original reviews and decisions were  
22 reasonable.

1 Thank you.

2 CHAIRPERSON GIACOMINI: Questions?

3 Joe?

4 MEMBER SMILLIE: Well, just one  
5 quick comment and that's I really appreciate  
6 OTA breaking up their submissions to the  
7 nopregulations.gov as far as subject titles  
8 go. And I urge future petitioners who talk on  
9 multiple issues to break them up so that they  
10 are all clearly available for review. So I  
11 appreciate that and I appreciate all of your  
12 comments.

13 MR. HUTCHESON: Thank you.

14 CHAIRPERSON GIACOMINI: Thank you.

15 Patti, then Pat, then Jake.

16 MS. BURSTEN-DEUTCH: I could

17 actually use a soap box. Here we go.

18 Hi, everybody. I'm Patti Bursten-  
19 Deutch of Organic Education Solutions and  
20 Organic Concepts. I live on a certified  
21 organic dairy farm in southwestern Wisconsin.  
22 And I've been a full-time independent organic

1 inspector since 1997.

2 In these many years, I've had the  
3 opportunity to inspect thousands of farms,  
4 facilities, and livestock operations. And  
5 during this time, it has become increasingly  
6 clear that there is a void in the long supply  
7 chain from producers to consumers.

8 This void creates an environment  
9 for some operations to game the system,  
10 creating an uneven playing field and providing  
11 cause for skepticism.

12 Since the inception of the NOP,  
13 the activities of many brokers, traders, and  
14 distributors have been considered to be  
15 excluded under 205.101(b). This was also the  
16 case in many pre-NOP private organic standards  
17 which served to provide a starting point for  
18 the current system.

19 Currently there are gaps in  
20 recordkeeping, procedures, and oversight of  
21 the activities of some uncertified brokers,  
22 traders, and distributors who deal in organic

1 goods that can allow compromising activities  
2 to occur.

3 Chief among these activities is  
4 non-organic goods being sold with an organic  
5 claim using otherwise valid organic producer  
6 certificates to represent more goods than were  
7 produced or purchased or to represent goods  
8 that were never purchased at all. This  
9 appears to be most prominent in organic  
10 commodities such as grains, soybeans, and hay  
11 and is not limited to a particular geographic  
12 area of the United States.

13 I understand that in the world of  
14 organic many consider fraud to be the F word.  
15 And as such, they don't really want to hear  
16 this word spoken out loud. So instead I think  
17 we could view this as the opportunity as in  
18 the opportunity to expand enforcement of the  
19 NOP under the existing regulation.

20 The opportunity exists because the  
21 language is already in the regulation to  
22 provide ample oversight of many activities

1 currently conducted without required organic  
2 certification and enforcement activity and  
3 without even the recordkeeping provisions  
4 required for exempt operations under  
5 205.101(c).

6 There is no need to change the  
7 regulation in order to expand enforcement. So  
8 in the interest of time, I'm going to spare  
9 you reading the section of the regulation.  
10 But I'd like to note that 205.101(b) provides  
11 for the following:

12 Any organically-produced products  
13 are exempt if they are one, packaged or  
14 otherwise enclosed in a container prior to  
15 being received or acquired by the operation,  
16 and two, remain in the same package or  
17 container and are not otherwise processed  
18 while in the control of the handling  
19 operation.

20 The opportunity presented here is  
21 that while this language supports the  
22 continued allowance of the exclusion of

1 brokers, traders, and distributors of finished  
2 packaged goods, whether wholesale ingredients  
3 or retail products, it does not support  
4 continued exclusion of bulk agricultural  
5 commodities such as grains, soybeans, or hay.

6           These are not generally packaged  
7 or enclosed in a container prior to being  
8 received by the broker, trader, or  
9 distributor. And if they are, they may not  
10 remain in that container for the duration of  
11 the handler's activity.

12           Hay is not packaged or enclosed  
13 and so clearly does not need the provisions of  
14 205.101(b). Bulk soybeans and grains are  
15 typically received by brokers, traders, or  
16 distributors in one container such as a  
17 railcar and transferred to another container.  
18 And so they also do not meet the provisions of  
19 205.101(b).

20           Several other commodities and  
21 goods can be sold, brokered, and traded in a  
22 similar fashion. And as it was just pointed

1 out to me, this issue can also really extend  
2 to brokers of livestock as well.

3 I'm here to ask that the NOSB  
4 recommend that guidance be issued to clearly  
5 articulate the limitations of 205.101(b) and  
6 the need for handling operations involved in  
7 the activities described above to seek organic  
8 certification or risk appropriate enforcement  
9 activity.

10 I request that the NOSB send the  
11 message that handling operations currently  
12 engaged in brokering, trading, and  
13 distribution activities in a manner  
14 inconsistent with 205.101(b) are operating  
15 illegally and are subject to penalties and  
16 fines as per 205.101(c)(i).

17 I'd like to add that these ideas  
18 are not entirely my own. They are really the  
19 culmination of many conversations with people  
20 who have observed this same thing. And to  
21 those, several of whom are here, I thank you  
22 very much for encouraging me to bring this



1 issue to light.

2 Thank you.

3 CHAIRPERSON GIACOMINI: Thank you.

4 Questions? Don't run off, Patti.

5 Katrina?

6 MS. BURSTEN-DEUTCH: Sorry.

7 MEMBER HEINZE: Yes, I just wanted  
8 to thank you for your comments. I think it is  
9 an important topic and appreciate you bringing  
10 it to the Board.

11 MS. BURSTEN-DEUTCH: Thank you.

12 CHAIRPERSON GIACOMINI: Thank you.

13 Pat Kane?

14 MS. KANE: I'll pass.

15 CHAIRPERSON GIACOMINI: You're  
16 passing? See, just like not being here. I  
17 was right the first time.

18 Okay, Jake with a proxy. Gwen --  
19 Gwendolyn Wyard and Steven Peirce.

20 PARTICIPANT: Are you getting  
21 silly?

22 CHAIRPERSON GIACOMINI: If it

1 helps.

2 MR. LEWIN: It is my distinct hope  
3 to not use the proxy. And I'm sure it is  
4 yours, too.

5 All right. My name is Jake Lewin.  
6 I'm the Chief Certification Officer for CCOF  
7 Certification Services. We certify about  
8 2,300 operations in 38 states in about three  
9 countries.

10 I want to thank you for all your  
11 work. I know you all work extremely hard. I  
12 know some of you personally and have spent  
13 some dinners with you. And I know the amount  
14 of work you do.

15 And with that, I believe I'll be  
16 nominated to the certifier's seat. And I  
17 humbly hope that I am chosen to serve. But  
18 I'm not sure why because it seems like a heck  
19 of a lot of work.

20 So, but the issue at hand, what we  
21 are here to talk about is the 100 percent  
22 recommendation. And we are CCOF request that

1 the Committee withdraw this recommendation and  
2 instead put forward either a recommendation  
3 that clarifies that non-organic additives or  
4 processing aids are prohibited in the 100  
5 percent organic labeling category without  
6 exception or a recommendation to eliminate the  
7 labeling claim of 100 percent organic.

8 We believe that the problem that  
9 must be addressed is the inconsistent approval  
10 of products in the 100 percent organic claim.  
11 And we respectfully ask that the Committee to  
12 return the discussion back to this issue.

13 It is clearly compliant with the  
14 regulation to clarify that the use of any  
15 material listed on 205.605 means that the  
16 final product cannot be labeled 100 percent  
17 organic. This interpretation is also far more  
18 practical than the recommendation proposed by  
19 the Committee, which would create a confusing  
20 and contradictory exemption that is poorly  
21 supported by the regulation itself.

22 As certifiers, CCOF dedicates

1 significant time and resources to the daunting  
2 task of explaining the subtleties of the NOP  
3 standards to certified operations. We support  
4 regulatory changes or guidance that makes  
5 certification requirements clearer and more  
6 intuitive to certified parties and to  
7 consumers.

8           Instead of bringing clarity to  
9 this issue, this recommendation suggests that  
10 we add another layer of complexity to the 100  
11 percent organic labeling category. The 100  
12 percent organic claim is the simplest for  
13 consumers to understand and identify.

14           However, the distinction between  
15 ingredients, processing aids, and inert  
16 atmospheric gases are not obvious to the  
17 consumer and nobody should need a degree in  
18 chemistry to understand the 100 percent  
19 organic claim.

20           We are also confused and concerned  
21 about the inclusion of argon in this  
22 recommendation since it is not listed on

1 205.605 and, therefore, we just can't figure  
2 out where it fits into this at all.

3 The benefits of creating another  
4 except in the case of clause to allow these  
5 materials in 100 percent organic products and  
6 to allow the use of argon, which is not  
7 currently on the National List, clearly  
8 outweigh the disadvantages of adding yet  
9 another complication to the rule.

10 So moving on from that, moving to  
11 the Made with seal, there has been a lot of  
12 comments on this. There is not a lot of  
13 support. I don't really see the need to pile  
14 on so I'm going to keep this brief.

15 We've got written comments. I'd  
16 encourage you to read them. At kind of its  
17 fundamental level, an optional seal is sub-  
18 optimal at best. It's unlikely to be used.  
19 And a mandatory seal is a non-starter since  
20 that would create a huge burden on  
21 manufacturers and creates color issues and  
22 packaging issues.

1           So we just -- we don't see it as  
2           workable and, instead, believe that there  
3           should be clarifications regarding that claim  
4           and more promotion and time spent promoting  
5           that claim.

6           Finally, because we ran out of  
7           time earlier, I'd like to just address the  
8           stocking rate charts very briefly. I'd like  
9           to point out that the NOSB in 2000 discussed  
10          this issue and recommended that the stocking  
11          rate guidelines be included in a management  
12          practices manual and not in the rule itself as  
13          they were so specific.

14          While a management practices  
15          manual was never developed and, therefore,  
16          such guidelines were not implemented, the  
17          wisdom of the previous Board holds true. I  
18          strongly recommend that when stocking rates  
19          are determined, they be added to the NOP  
20          policy manual that is currently under  
21          development and not included in the  
22          regulations.

1                   So those are our comments on those  
2                   issues. And really thank you for taking the  
3                   time to hear them.

4                   CHAIRPERSON GIACOMINI: Questions?  
5                   Jay?

6                   MEMBER FELDMAN: Yes. Do you guys  
7                   certify any 100 percent organic?

8                   MR. LEWIN: Yes, absolutely,  
9                   often.

10                  MEMBER FELDMAN: Okay. Why would  
11                  we need to put inert -- you said inert and  
12                  atmospheric gases on 605?

13                  MR. LEWIN: The inert atmospheric  
14                  gases, with the exception of argon, that are  
15                  discussed in this recommendation already  
16                  appear under 605. It is there. Their use in  
17                  organic is predicated on that listing. And we  
18                  believe that any use of a material based on  
19                  its 605 listing should result in that material  
20                  being labeled organic. Does that make sense?

21                  CHAIRPERSON GIACOMINI: Joe?

22                  MEMBER FELDMAN: Thank you.

1                   MEMBER SMILLIE: At the risk of --  
2           I'll address some of your comments tomorrow  
3           when I present the 100 percent option. We  
4           would agree to disagree on that item.

5                   The argon we'll have to think  
6           about since it isn't on 605. But the idea is  
7           not so much whether they are allowable or not.  
8           It is the question of whether they are a  
9           processing aid or not. And the Committee  
10          believes that they are not. They shouldn't be  
11          looked at as a processing aid but as a  
12          packaging aid. And hence, you know, that's  
13          why our recommendation is there.

14                   As far as the 100 percent category  
15          itself, originally we considered making a  
16          recommendation to abolish the category. But  
17          for various reasons, we decided to just remedy  
18          this particular discreet usage. And I'll go  
19          into more detail tomorrow when I present the  
20          Committee. But we will certainly take account  
21          of your comments.

22                   MR. LEWIN: We have some



1 significant concerns regarding implementing a  
2 justification based on a term packaging aid  
3 that appears nowhere in the regulation. It  
4 starts to verge on semantic niceties in order  
5 to gain exceptions to use of the 100 percent  
6 organic claim.

7 And it doesn't lead us down a good  
8 road. It leads us down a road of a thicket of  
9 exemptions for what should be relatively  
10 simply and what we should do our best to keep  
11 simple.

12 CHAIRPERSON GIACOMINI: Thank you.

13 Gwendolyn Wyard, Steve Peirce,  
14 John Ashby.

15 MS. WYARD: Testing, testing. All  
16 right. Great. Thanks.

17 Good evening, Mr. Chairman,  
18 members of the Board, NOP staff, and ladies  
19 and gentlemen of the gallery. My name is  
20 Gwendolyn Wyard speaking on behalf of Oregon  
21 Tilth.

22 I'm the Processing Program

1 Technical Specialist, holding a degree in Food  
2 Science. I've worked in the farming and  
3 certification community since 1994.

4 And I've also been working closely  
5 with the Board on the topics of agricultural  
6 and non-agricultural and synthetic and non-  
7 synthetic since 2004 when Oregon Tilth first  
8 submitted a proposal with a solution for  
9 distinguishing between agricultural and non-  
10 agricultural.

11 I also co-chaired the Material  
12 Working Group with Kim Dietz.

13 You have our written comments. We  
14 have comments on the USDA seal on Made with  
15 products as well as use of inert atmospheric  
16 gases in the 100 percent label. I'm not going  
17 to touch on those. If you have any questions,  
18 we concur with CCOF on the use of the Made  
19 with seal. We have a slightly different take  
20 on the use of inert atmospheric gases.

21 But what I am going to try to do  
22 today is bring some -- hopefully some

1 clarification to the discussion surrounding  
2 chemical change. Okay so we're talking about  
3 the classification of materials.

4 And the definition of chemical  
5 change, what I have up on the screen, the red  
6 is the OTCO Oregon Tilth proposed definition  
7 or addition to chemical change. It is going  
8 to be hard to see.

9 The blue is the one that was put  
10 out this morning. And the green is the one  
11 that's in the addendum document that went out.

12 So the green one, there was a lot  
13 of commenters that were concerned about the  
14 document that went out, feeling that it went  
15 too far. It went beyond an exception that was  
16 provided really to agricultural products to  
17 process food. And I'm going to give some  
18 background hopefully that will help clarify  
19 that.

20 The green version could have  
21 presented us with a situation where you could  
22 take two non-synthetics and react those and

1       come up with a third. And in the situation of  
2       a crop or a livestock input.

3                   And I'm not going to speak on  
4       whether or not that is good or bad. But I  
5       will say it is different. It is different  
6       than historically, you know what's been  
7       reviewed and decided in terms of crop and  
8       livestock inputs.

9                   So I want to go back to the 1993  
10      Handling Committee working draft. And I want  
11      to read you a couple sections from that.

12                   And when they were discussing the  
13      structuring and the National List and talking  
14      about agricultural, non-agricultural,  
15      synthetic, and non-synthetic, they said the  
16      first question is whether the normal effects  
17      of food processing by processing methods  
18      specifically allowed in the OFPA, such effects  
19      being known to generate chemical changes in  
20      food, thereby render the food synthetic.

21                   The Committee's consideration of  
22      the term synthetic led to the following

1 statement. The term synthetic shall not be  
2 applied to otherwise non-synthetic substances  
3 that is formulated or manufactured by  
4 processing as defined in the Act.

5 That idea was carried forth into  
6 the 2005 clarification document on synthetic  
7 and non-synthetic where the Board was very  
8 clear when they said this clarification, as it  
9 relates to the definition of synthetic in the  
10 regulation, is about inputs put on to 601  
11 through 606.

12 Okay, it doesn't apply to the  
13 processing of food or agricultural products  
14 that are processed by handling operations. It  
15 was really trying to distinguish between what  
16 takes place in a handling operation versus the  
17 inputs that the Board is reviewing to go on to  
18 the National List.

19 Okay. So the problem, however, is  
20 that you have the processing of food, okay, so  
21 you're toasted wheat, your bread, I think that  
22 most people can say if it goes through a

1 chemical change, not synthetic.

2 But there are substances that you  
3 will be looking at that go onto 605 or ones  
4 that are already on there that could be  
5 processed organically. And you also could  
6 review them and they could be synthetic.

7 So it is looking at specifically  
8 substances that are going on to 605, inputs on  
9 605 or 606, and asking whether they could be  
10 organic.

11 If you'd put up the next slide,  
12 Valerie, this is our -- this simplifies it a  
13 little bit -- our suggestion for chemical  
14 change. A term synthetic shall not be applied  
15 to the processing of agricultural products as  
16 defined in 205.270(a).

17 We're choosing 205.270(a) versus  
18 205.2, which is in your suggested definition  
19 as of this morning, because 205.270 is under  
20 the regulations for handling operations.

21 Please go on to the next slide. A  
22 lot of this has to do with commercial

1 availability. Assign it to 605 to all  
2 ingredients in the five percent.

3 So any questions, there's quite a  
4 bit more that I could speak on but I know  
5 we're all tired.

6 Katrina?

7 CHAIRPERSON GIACOMINI: Katrina?

8 MS. WYARD: Sorry.

9 CHAIRPERSON GIACOMINI: No, that's  
10 all right. Just go right ahead.

11 (Laughter.)

12 MEMBER HEINZE: Gwendolyn, as  
13 always, thank you for all your thought on this  
14 topic and insightful comments.

15 To maybe distill your comment down  
16 to maybe its key point, what I'm hearing is  
17 you like the language that we had this morning  
18 but it goes too far in going to crops and  
19 livestock. And you would prefer that it just  
20 be focused on handling.

21 MS. WYARD: It's -- yes, it needs  
22 to be -- it is an exception provided to

1 processed food, to processed agricultural  
2 products and inputs that are put onto 605 or  
3 606 because you don't want to put something on  
4 to 605 as a synthetic, as a non-agricultural  
5 synthetic when an organic alternative is  
6 available or could be available because then  
7 we're stuck in the situation that is really  
8 what is the big stumbling block that we're up  
9 against.

10 People are less attached to  
11 whether something is classified as  
12 agricultural or non-agricultural per se but  
13 very attached to whether or not it can be  
14 produced organically or people should be  
15 required to source an organic form.

16 And that's why we're saying a lot  
17 of this could be eliminated if you were to  
18 apply commercial availability to anything in  
19 the five percent. A lot of this would be  
20 eliminated.

21 MEMBER HEINZE: Yes. So limit it  
22 to processing.



1 MS. WYARD: Absolutely. It has  
2 always been the intent. And their definition  
3 this morning said the processing of  
4 agricultural products using materials on 601  
5 or 602, I don't really understand how that  
6 even makes sense because if I am processing an  
7 agricultural product, I'm a handling  
8 operation, I'm not looking to 601 or 603. I'm  
9 limited to 605 and 606 only.

10 So the way that that wording is  
11 structured, it's not even allowed by the  
12 regulations. It's the difference between the  
13 evaluation of an input versus evaluation of a  
14 processed agricultural product or food. So  
15 you need to make that distinguished.

16 MEMBER HEINZE: Thanks.

17 MS. WYARD: Sure. Any other  
18 questions?

19 CHAIRPERSON GIACOMINI: Do you  
20 want to comment? Go ahead, Jay.

21 MEMBER FELDMAN: Is there -- any I  
22 crazy or is there any reason to distinguish

1       between 605(a) and 605(b) in this whole  
2       conversation -- discussion?

3                   MS. WYARD: Well, for 95.5, it has  
4       to be on the list period. Where synthetic and  
5       non-synthetic comes into play is really -- and  
6       I think a couple people have brought this up  
7       although it is not currently applied is the  
8       idea of organic preference where you use  
9       organic first, then you use non-synthetic,  
10      then you use synthetic.

11                   But for 605, in organic products,  
12      it has to be on 605 or 606. But we --

13                   MEMBER FELDMAN: Right. But  
14      whether we define that product as synthetic or  
15      not, the distinction between 605(a) and 605(b)  
16      seems significant because the (a) obviously is  
17      non-synthetic or natural and the other is  
18      synthetic. So, you know --

19                   MS. WYARD: Because it is a closed  
20      list, it certainly has a lot less significance  
21      than with crop or livestock.

22                   MEMBER FELDMAN: Okay. But it has

1 some significance.

2 CHAIRPERSON GIACOMINI: Jay, the  
3 difference -- and you're not crazy --

4 MEMBER FELDMAN: Okay.

5 CHAIRPERSON GIACOMINI: -- you  
6 make complete sense.

7 MS. WYARD: Yes.

8 CHAIRPERSON GIACOMINI: It's just  
9 not the way the law is written. The law  
10 states a chemical change. It doesn't say what  
11 made it.

12 MEMBER FELDMAN: Right.

13 CHAIRPERSON GIACOMINI: We've  
14 looked at that before.

15 MEMBER FELDMAN: Okay. I feel  
16 crazy though.

17 CHAIRPERSON GIACOMINI: No, you're  
18 just tired.

19 John?

20 MEMBER FOSTER: So going to the  
21 terminology or the definition that you are  
22 comfortable with, would that have, in your

1 mind, any bearing on the Corn Steep Liquor  
2 question?

3 MS. WYARD: Valerie, do you want  
4 to go back one bit here? Okay.

5 So if you had somebody producing  
6 Corn Steep Liquor using enzymes, I mean this  
7 would be a situation where you could look at  
8 Corn Steep Liquor in the context of crops, and  
9 you could say okay, the sulfur dioxide, we're  
10 going to decide that the cleavage of the  
11 disulfide bonds, that's synthetic.

12 Make your synthetic determination.  
13 Just because you've made that synthetic  
14 determination for that particular source and  
15 process doesn't mean that a non-synthetic or  
16 an organic form could also be available.

17 If you were to now have somebody  
18 that wants to petition cornstarch or some  
19 other product of the wet milling process to  
20 605 or 606, now if you were to plug in this --  
21 the second part of this definition, it's  
22 processing, it's using materials on 605 or

1 606, it would not be synthetic.

2           Rather it would be, in this  
3 particular case, non-synthetic and potentially  
4 could be made in organic form, which is the  
5 case with the organic cornstarch, organic  
6 maltodextrin, and all the ones that are  
7 utilizing enzymes versus sulfur dioxide or  
8 sulfurous acid.

9           MEMBER FOSTER: Okay. So if I  
10 hear you correctly, and correct me if I'm  
11 wrong, then since sulfur dioxide is on 605, is  
12 it not --

13           MS. WYARD: Annotated restriction.

14           MEMBER FOSTER: -- well, okay, but  
15 we haven't talked about annotations yet,  
16 right?

17           MS. WYARD: Well, when we talk  
18 about a material on 605 or 606, we talk about  
19 the material and its annotation.

20           MEMBER FOSTER: Okay.

21           MS. WYARD: We don't speak of them  
22 differently. They're all one.

1                   MEMBER FOSTER: Thank you. Then  
2 we're only talking about ingredients, never  
3 about inputs here, correct?

4                   MS. WYARD: Ingredients.

5                   MEMBER FOSTER: Correct. So my  
6 wish in all of this has been to use the same  
7 definition for synthetic, whether we're  
8 talking about an ingredient or an input. It's  
9 my wish.

10                   I realize I don't always get what  
11 I wish for. But what I would also wish to  
12 avoid is down the road someone else coming up  
13 with a definition of synthetic for an input  
14 that is inconsistent with what we come to  
15 here. That's a train wreck.

16                   And by not including determination  
17 of ag inputs, farm crop, or livestock inputs  
18 under this same umbrella --

19                   CHAIRPERSON GIACOMINI: Is there a  
20 question in here, John?

21                   MS. WYARD: Oh, there must be.

22                   MEMBER FOSTER: Eventually. Does

1 -- am I right in understanding that in your  
2 thinking, this would not apply to farm or  
3 livestock inputs?

4 MS. WYARD: No because the  
5 historical practice of material evaluation has  
6 been this, this exception that commenters were  
7 wanting to have built into this recommendation  
8 applied to food and processing, all of the  
9 materials that have been reviewed for many,  
10 many years have not applied this exception.

11 So to now take this exception and  
12 apply it to crop and livestock, that's going  
13 to be very different from a lot of decisions  
14 that have been made in the past.

15 So, you know, good or bad, it's  
16 just something we'll have to contend with.  
17 It's different. It's a change.

18 And also if anybody wants to ask  
19 any questions about the worksheets and how  
20 I've split apart the decision sheets that you  
21 put together and how they should definitely be  
22 split into ag and non-ag and synthetic and

1 non-synthetic, I'd love to answer those  
2 questions as well.

3 CHAIRPERSON GIACOMINI: Katrina?

4 MEMBER HEINZE: It will be fast.

5 I was just going to say we appreciate getting  
6 them. Obviously that work will come after --

7 MS. WYARD: Guidance document,  
8 work to come. Yes, I'm here for you.

9 Anything, assistance, I love it.

10 Thank you very much.

11 CHAIRPERSON GIACOMINI: Thank you.

12 Steve Peirce, John Ashby, Alexis  
13 Baden-Mayer.

14 MR. PEIRCE: Good evening. And I  
15 would like to start by saying thank you for  
16 the volunteer work that you all do. And the  
17 dedicated effort that the NOP puts in for our  
18 industry.

19 My comments this afternoon are  
20 relating to the National List and actually the  
21 removal of synthetics or non-organic  
22 ingredients from that list. And it is the



1 procedures involved.

2 My credentials, I'm a president of  
3 a company. I could be considered an  
4 entrepreneur, part-time inventor, in one of  
5 those kind of organizations that I think you,  
6 the Board, and the NOP has looked to to find  
7 organic and natural, wholly natural  
8 alternatives to some of the synthetics that  
9 are on the National List.

10 I have submitted comments in 2007  
11 during the Sunset Review period as it related  
12 to silicone dioxide. Those comments seem to  
13 have been lost.

14 Secondly, we have submitted  
15 petitions to have silicone dioxide removed.  
16 I understand that the Board is going to be  
17 looking at that in the fall. And that  
18 petition would fly in the face of allowing an  
19 exemption for it again for the next five  
20 years.

21 Likewise, there are petitions  
22 coming on the subject of mono and diglycerides

1 for use as drum dry release agent according to  
2 the annotation on it.

3 With that in mind, the Sunset  
4 process I think is very good, very time  
5 consuming and part of what went into the Act  
6 when it was originally conceived. I think  
7 there is good direction on how to make  
8 comments, whether you are in favor of leaving  
9 a product on the list or removing the product.

10 However, what is either non-  
11 existent or I consider to be non-existent, is  
12 the information necessary for you, the Board  
13 members so that, as Jay said earlier today,  
14 you guys need to know what products are  
15 produced? Who is producing it? Is it a  
16 natural alternative? Does it fit the  
17 commercial availability?

18 So that you can make informed  
19 decisions not to disrupt the supply chain  
20 because that is one of your biggest concerns.

21 One is food safety and life safety. But also  
22 not to interrupt that supply chain.

1 I think some provisions need to be  
2 made in that Sunset period so that someone  
3 that does invent something new and bring it to  
4 the marketplace can have the right process to  
5 inform you properly at the right time so that  
6 you can make an informed decision.

7 In that same vein, as we look at  
8 the petition process, it is all about how to  
9 get new synthetic or new non-organic  
10 ingredients on to the National List. Those on  
11 ramps onto that interstate highway are very  
12 well built and very well used.

13 What was conceived of in the Act  
14 to have a system where there are also off  
15 ramps so we don't get too crowded on that  
16 highway, they haven't been built. I applaud  
17 you on what you did earlier this year or last  
18 year as it related to lecithin. It wasn't  
19 easy. Brain damaging. Took a lot of time.  
20 And sure as heck was not efficient.

21 Something needs to be done so that  
22 the entrepreneurs that are out there that are

1 supporting what the Act stands for, what the  
2 NOP and the NOSB stand for, so we know how to  
3 actively get involved in that game, get our  
4 product, when it is in the commercial  
5 marketplace, our products have been sold in  
6 probably nine, 12 countries around the world  
7 into organics but yet silicone dioxide still  
8 remains on the National List.

9 So looking at this, the group that  
10 we most hardily support seems to be one of the  
11 hardest hurdles for us to jump is making that  
12 awareness. If you read the Act, and I know  
13 all of you have, it talks about that the  
14 reason an exception is given is when a wholly  
15 natural alternative doesn't exist.

16 And Joe made the comment today  
17 start using the organic hops. I'm sure the  
18 other certifiers will cause the producers to  
19 start buying that and using that. That's kind  
20 of fantasy land because I've got to tell you,  
21 it doesn't happen that way.

22 Since we've had a product on the

1 market over the last four years, I've had  
2 probably two cases where people have said my  
3 certifier said I need to look for this type of  
4 alternative.

5 So in closing with the one-minute  
6 mark, I support what you guys are doing. We  
7 have invented some products.

8 We have brought them to the market  
9 in commercial availability, working as one-to-  
10 one replacers on silicone dioxide, working as  
11 replaces for mono and diglycerides, we're  
12 going through the process, as set up by the  
13 Federal Register, and just encourage more of  
14 the dialogue like Jay talked about so that  
15 producers and regulators are in sync with one  
16 another and their system informs to that  
17 you've got yes, good on ramps for products  
18 that are needed in organics as well as good  
19 off ramps so that when some of those non-  
20 organic items are timed to either sunset or be  
21 disallowed, it is an easier, smoother, more  
22 efficient process for the entire industry.

1 Thank you.

2 CHAIRPERSON GIACOMINI: Questions?

3 Joe?

4 MEMBER SMILLIE: Have we received  
5 that petition?

6 MR. PEIRCE: The Board probably  
7 has not. It was filed in January. It was  
8 resent -- it was resubmitted back to us on a  
9 point of confusion. Are we supposed to fill  
10 out the two parts according to the Federal  
11 Register as to why the synthetic is no longer  
12 necessary or do we need to fill out the 12-  
13 part portion that talks about ten sections,  
14 all about the synthetic that you are trying to  
15 displace rather than those specific items that  
16 we would bring to the market.

17 It was resubmitted to Washington,  
18 D.C. and received on Monday of this week. So  
19 you haven't gotten it yet.

20 CHAIRPERSON GIACOMINI: We don't  
21 have it then.

22 MR. PEIRCE: Okay. Good. No, you

1 haven't missed anything.

2 CHAIRPERSON GIACOMINI: Okay.

3 Thank you very much. And a lot of these  
4 things will come up in discussions tomorrow  
5 specifically rather than getting into them  
6 when we don't really have questions here.

7 MR. PEIRCE: Understood. Thanks  
8 again.

9 CHAIRPERSON GIACOMINI: Thank you.

10 John Ashby, Alexis Baden-Mayer --  
11 I'm not sure whether Meredith Niles is up or  
12 Jaydee Hanson is next. I have notes on here  
13 and I'm not sure what they mean.

14 So, John, go ahead.

15 MR. ASHBY: John Ashby with  
16 California Natural Products.

17 In the interest of the late hour,  
18 I've decided to present my comments in the  
19 form of a couple of haikus.

20 (Laughter.)

21 MR. ASHBY: 605(a), (b), thanks.  
22 Processors need them all. They don't hurt

1 nothing.

2 Nanochemistry, weird. This is  
3 what matters. Food safety will trump all.

4 One, two, three is best. Adjust  
5 annotations, oops, is the NOSB.

6 And finally, 205, 207(a), are  
7 chemical reactions. Synthetic, it depends.

8 (Laughter and applause.)

9 CHAIRPERSON GIACOMINI: You've had  
10 all day. We will not ask questions in the  
11 form of haiku.

12 Katrina?

13 MEMBER HEINZE: I would  
14 respectfully ask that you submit those in  
15 writing.

16 (Laughter.)

17 MR. ASHBY: Okay. I don't think I  
18 edited them in the reading.

19 MEMBER HEINZE: No, please,  
20 please, that was the most succinct think I  
21 have ever heard.

22 CHAIRPERSON GIACOMINI: Okay. One



1 question before you go. Valerie, what's my --  
2 can you clarify the note on Meredith and  
3 Jaydee?

4 MS. FRANCES: Meredith is the  
5 proxy for Jaydee Hanson as well. Or the other  
6 way around. Meredith is supposed to be here.

7 CHAIRPERSON GIACOMINI: One will  
8 speak for ten minutes.

9 MS. FRANCES: Yes.

10 CHAIRPERSON GIACOMINI: Okay. And  
11 then after that would be David Bronner. Okay.  
12 Alexis, I'm sorry about that. But  
13 go ahead.

14 MS. BADEN-MAYER: I'm going to do  
15 an interpretive dance.

16 (Laughter.)

17 MS. BADEN-MAYER: I'm Alexis  
18 Baden-Mayer. I'm here on behalf of the  
19 Organic Consumers Association and the 900,000  
20 organic consumer activists who have worked  
21 with us over the last decade for a national  
22 organic program that lives up to consumer

1 expectations for organic food and farming.

2 Consumers expect organic to be  
3 safer, more nutritious, better for the  
4 environment, and kinder to animals than non-  
5 organic food and farming. And it is. But  
6 there are decisions that you will make as  
7 members of the National Organic Standards  
8 Board this week that will determine just how  
9 much better organic is.

10 Please support continuous  
11 improvement in organic by banning nanotech,  
12 letting the October 2010 Sunset on synthetic  
13 methionine happen, and keeping up the good  
14 work that you all have begun to put measurable  
15 minimum requirements behind the animal welfare  
16 standards that already exist.

17 Along with my testimony, I am  
18 submitting 16,184 letters from our members in  
19 support of excluding nanoengineering from  
20 organic and 8,767 letters in support of ending  
21 the use of synthetic methionine.

22 Organic is largely defined by what

1 it is not, no harmful pesticides, synthetic  
2 fertilizers, or radiation, sewage sludge,  
3 antibiotics, genetic engineering, or animal  
4 cloning. It's time to add nanotechnology and  
5 exclude that, too.

6 We need to give consumers a way to  
7 avoid unlabeled and potentially dangerous  
8 nanotech packaging and ingredients. Ban  
9 nanotechnology from organic by making  
10 nanoengineering an excluded method, not just  
11 prohibited synthetic materials that could be  
12 petitioned for use at a later time, but an  
13 excluded method that has no place in organic.

14 Organic, of course, is a lot more  
15 than what it isn't. We call organic organic  
16 because it builds up the organic matter in the  
17 soil. Organics' capacity to maintain and  
18 build soil fertility is the reason that it  
19 will be organic farming that feeds the world  
20 into the future.

21 Building organic matter in the  
22 soil also traps carbon dioxide. The Rodale

1 Institute has estimated that if all the  
2 world's crop land were transitioned to  
3 organic, it would sequester 40 percent of the  
4 world's current greenhouse gas emissions. And  
5 that's just crop land. Pasture has even more  
6 potential to trap carbon dioxide.

7 If it doesn't build soil's organic  
8 matter, then it isn't organic. Unfortunately,  
9 there is a lot of organic food production in  
10 the US that isn't in crop land or pasture.

11 It's in sheds full of animals. Thirty  
12 thousands hens in a single building with a  
13 little door to a little porch. That's what is  
14 being certified as organic in chicken and egg  
15 production.

16 They are fed organic corn and soy,  
17 no antibiotics, no cages, but it is a far cry  
18 from what one would expect from reading the  
19 current rules. Animals raised organically are  
20 supposed to be given access to the outdoors  
21 and be allowed to exhibit their natural  
22 behaviors under conditions that provide for

1 exercise, freedom of movement, and reduction  
2 of stress.

3 If it weren't for the use of  
4 synthetic methionine, producers that didn't  
5 let their chickens out to scratch for food in  
6 pasture would have chickens that looked really  
7 sick. And the certifiers would see the stress  
8 that results when chickens are prevented from  
9 exhibiting their natural behaviors.

10 Synthetic methionine is a crutch  
11 that the industry has used to scale up  
12 production and keep costs down. This is  
13 organic as we know it. But this means the  
14 grocery store organic consumer is being  
15 deprived of the pleasure of cracking open a  
16 pasture-raised egg and seeing the difference  
17 for themselves. Pasture-raised hens lay eggs  
18 with yolks that are deep, bright, red-orange.

19 It's so different from what you  
20 see in organic eggs in the grocery store  
21 today. The difference you are seeing is the  
22 nutrition, four to six times as much Vitamin

1 D, one-third less cholesterol, one-fourth less  
2 saturated fat, two-thirds more Vitamin A, two  
3 times more Omega-3 essential fatty acids,  
4 three times more Vitamin E, seven more times  
5 beta carotene.

6 But organic consumers who shop at  
7 the grocery store won't see that. And they  
8 won't know what they are missing.

9 And maybe they will just agree  
10 with the United Egg Producers that there's no  
11 real difference between organic eggs and  
12 regular eggs. Maybe they will learn that  
13 organic chickens are fed synthetic feed  
14 supplements and kept by the tens of thousands  
15 in huge sheds.

16 I don't want to be the one to tell  
17 them that. I want to tell them that in  
18 October 2010, synthetic methionine is being  
19 phased out and won't be allowed in organic  
20 anymore. And that organic has strong animal  
21 welfare standards that are strictly enforced  
22 to produce food that is safer, more

1 nutritious, and better for the environment.

2 So I will be reporting back to our  
3 members. And I hope you all give us something  
4 to be excited about.

5 CHAIRPERSON GIACOMINI: Questions?  
6 Jay?

7 MEMBER FELDMAN: So I'm curious  
8 how you view the responsibility of the NOSB in  
9 light of -- you know, you are the largest  
10 organic consumer organization by name although  
11 I suspect Consumers Union might have claim a  
12 large segment of the population on this issue  
13 as well.

14 These issues you are discussing,  
15 you know, are they issues you feel we have  
16 discretionary authority on? Or do you see the  
17 law is very clear and in terms of a mandate,  
18 given the statute and the regulations?

19 MS. BADEN-MAYER: It's clear to me  
20 when I read the law. I mean it seems obvious  
21 that the idea is to phase out synthetics,  
22 continuous improvement, you know, and build a

1 system that improves soil fertility, and  
2 respects animals' natural behaviors.

3 I mean all these things seem  
4 obvious to me. And from the certifiers that  
5 show up here, you know, it seems obvious to  
6 them, too. I don't think that the scrupulous  
7 certifiers who are presenting before the NOSB  
8 and are really involved, I think they are  
9 doing the right thing.

10 That's my assumption.

11 MEMBER FELDMAN: Yes.

12 MS. BADEN-MAYER: I'm willing to  
13 suspend my disbeliefs and imagine that the way  
14 I interpret the law is the way it is being  
15 enforced.

16 MEMBER FELDMAN: Right. I mean  
17 obviously there is the issue of consumer  
18 perception here. But there is also what our  
19 statutory duty is. And that's what I need to  
20 hear in terms of what our responsibility is as  
21 a Board to meet the standards of the law as  
22 they exist right now.



1                   And it sounds like what you are  
2                   saying is all the positions you are taking are  
3                   based on what you believe is the correct  
4                   reading of the law.

5                   MS. BADEN-MAYER: Yes. And I  
6                   think that a lot of the issues that are before  
7                   you that you are trying to figure out like the  
8                   animal welfare issues, if we just had, you  
9                   know, all the people who come to the NOSB  
10                  meetings, I think really understand things.

11                  But we have a lot of people  
12                  participating in organic now who aren't as  
13                  dedicated. They're not the first wave. They  
14                  aren't the people who invented organic. You  
15                  know and for them maybe we need clearer  
16                  guidelines.

17                  MEMBER FELDMAN: Thank you.

18                  CHAIRPERSON GIACOMINI: I have  
19                  one. Do you have any comment at all on the  
20                  238(c)(i) recommendation?

21                  MS. BADEN-MAYER: I'm sorry. What  
22                  is that?

1                   CHAIRPERSON GIACOMINI: The  
2 products on 603 with the withholding period  
3 that are given to cows on whether that milk  
4 can be fed to the calves.

5                   MS. BADEN-MAYER: Is that  
6 something I can submit comments on before May  
7 25th? Okay, then I'll look --

8                   CHAIRPERSON GIACOMINI: No, we  
9 would be voting on that at this meeting.

10                  MS. BADEN-MAYER: My understanding  
11 was that you are accepting comments until the  
12 25th --

13                  CHAIRPERSON GIACOMINI: No, that's  
14 not a Sunset item, no.

15                  MS. BADEN-MAYER: It's not one of  
16 the -- okay, sorry, never mind.

17                  CHAIRPERSON GIACOMINI: No, no.

18                  MS. BADEN-MAYER: I'm sorry. I  
19 don't know about this issue.

20                  CHAIRPERSON GIACOMINI: Okay.  
21 Okay. Thank you.

22                  MS. BADEN-MAYER: It's bad.

1                   CHAIRPERSON GIACOMINI:   And she  
2                   says we're the group of no.   Okay.

3                   Is this Meredith or Jaydee?

4                   MS. NILES:   I am Meredith, not  
5                   Jaydee.

6                   CHAIRPERSON GIACOMINI:   Okay,  
7                   Meredith, Dave Bronner, and Cheryl van Dyne.

8                   Meredith, do you need five or ten  
9                   or two fives?

10                  MS. NILES:   I'm going to do my  
11                  best to not take ten but that's what I'm  
12                  scheduled for, I believe.

13                  CHAIRPERSON GIACOMINI:   That's so  
14                  tempting to say give her eight.   But go ahead.

15                  MS. NILES:   Okay.   Good evening.  
16                  I'm speaking on behalf of the Center for Food  
17                  Safety and the International Center for  
18                  Technology Assessment.   They are both actually  
19                  at the Supreme Court today testifying against  
20                  an appeal by Monsanto to repeal the injunction  
21                  on genetically-engineered alfalfa.   So I'm a  
22                  consultant to the Center for Food Safety and

1 I'll be speaking about nanotechnology.

2 Nanotechnology, like genetic  
3 engineering, irradiation, cloning of animals,  
4 and sewage sludge is antithetical to the  
5 intent and letter of organic law and the rules  
6 governing organic practices.

7 It is an industrial engineering  
8 process intended to engineer and manipulate  
9 nature at its most fundamental level. The  
10 platform technology allows industry to create  
11 or synthesize products that can behave in ways  
12 that naturally-occurring substances simply  
13 cannot.

14 A company intentionally  
15 manufactures or engineers a material at the  
16 nano scale so it can use the new properties  
17 that emanate from the nanoscale such as  
18 increased surface area, solubility, size,  
19 charge, physical dimensions, et cetera.

20 As such, it does not matter  
21 whether the original bulk material comes from  
22 a natural source because once nanotechnology

1 is applied, the chemical and physical changes  
2 that result render it a non-agricultural  
3 synthetic material.

4 Today's engineered nanomaterials  
5 and nanoparticles, as well as those in  
6 development, are different from anything else  
7 that occurs in nature. This is precisely why  
8 nanotechnology is promoted so heavily by  
9 industry.

10 While proponents may claim that  
11 their new products are just the same as non-  
12 nanoproducts to regulators, at the same time,  
13 they are claiming that their products are  
14 entirely new with novel properties in order to  
15 secure patents.

16 Naturally-occurring nanoparticles,  
17 such as salt nanocrystals found in the ocean  
18 or carbon nanoparticles emitted from fire, are  
19 very different from nanoparticles that are  
20 deliberately engineered or manufactured.

21 Nature makes them as nature has  
22 intended, in the natural environment. As

1 naturally-occurring and not manufactured,  
2 artificially synthesized or deliberately  
3 engineered, these natural nanoparticles should  
4 be omitted from the definition of  
5 nanoparticles or in the materials that are  
6 prohibited under the organic rules.

7 Section 2118 of the Organic Foods  
8 Product Act outlines the standard that must be  
9 met in order for synthetic substances to be  
10 included on the National List.

11 Nanotechnologies and materials, as a class,  
12 fail to meet this standard and, therefore,  
13 they should be prohibited in organic now and  
14 in the future.

15 That said, if nanomaterials are  
16 classified as synthetic without a prohibition  
17 as an excluded substance and method, every  
18 single nanofood and nanofood packaging  
19 ingredient would be allowed to be petitioned  
20 for inclusion on the National List. Such  
21 petitions should, and hopefully would, be  
22 denied because the production of GECs in crops

1 fundamentally contravene the intent and  
2 express language of the Organic Foods  
3 Production Act.

4 But the integrity of the standards  
5 would be in constant jeopardy or question and  
6 organic advocates would have to remain forever  
7 vigilant that no nano-derived materials slip  
8 on to the National List.

9 The only way to protect the  
10 integrity of organic is to prohibit  
11 nanotechnology and engineered nanomaterials as  
12 a class because it is antithetical to the  
13 principles and purpose of the organic  
14 standard.

15 The assumption that there may be  
16 some type of nanotechnology application that  
17 may have the potential to be considered  
18 organic in the future should not be used as a  
19 basis for setting organic policy. That  
20 argument is without merit and it would be an  
21 irresponsible public policy to leave open the  
22 door for nanotechnology on that basis.

1           Instead, at this moment, there  
2           exist sufficient evidence to prohibit the use  
3           of nanotechnology by taking precautionary  
4           action particularly in light of the fact that  
5           nanotechnology intentionally manufactures or  
6           engineers synthetic substances that pose a  
7           demonstrated risk to both human and  
8           environmental health.

9           Please refer to our comment that  
10          we submitted in both April and November of  
11          2009 regarding these risks.

12          In our written comments we propose  
13          specific amendments to the definition of nano  
14          and we ask the NOSB to seriously consider them  
15          when deliberating on this issue.

16          In short, the definition of  
17          nanomaterials and particles and the basis for  
18          its prohibition pivots on two significant  
19          factors. First, their non-agricultural  
20          synthetic nature and two, the fact that they  
21          are intentionally engineered or manufactured.

22          We argue that all nanoparticles



1 and structures which have at least one  
2 dimension and the nanoscale range of one to  
3 300 nanometers must be considered synthetic,  
4 non-agricultural, and prohibited from organic  
5 agriculture.

6 Such nanoparticles do not qualify  
7 as processing aids, adjuvant excipients,  
8 solvents or other inert or minor ingredient  
9 substances even when present in insignificant  
10 amounts in the final product.

11 We further argue that the nano  
12 prohibition should not include naturally-  
13 occurring nanomaterials such as sea salt or  
14 nanomaterials that form during traditional  
15 food manufacturing and processing including  
16 homogenization, cheese making, or grain  
17 milling.

18 The NOSB definition of  
19 nanomaterials need not rest on the ability to  
20 detect the nanomaterials through techniques  
21 such as electron microscopes or other  
22 meteorological devices as suggested in our

1 class for comments. The NOSB can best address  
2 this concern by making nanotechnology a  
3 prohibited method.

4 Nanotechnology are synthetic in  
5 that they are engineered materials intended to  
6 take advantage of their properties at the  
7 nanoscale. Engineering an element, mineral,  
8 or a chemical compound at the nanoscale  
9 profoundly changes the ways in which a new  
10 nanomaterial's function can arise.

11 Unlike synthetic chemistry in  
12 which the chemistry of a chemical is altered  
13 and a new chemical is formed,  
14 nanotechnological engineering can change  
15 synthetic chemicals and natural metals'  
16 chemicals into a substance that is essentially  
17 a new synthetic because of its new properties  
18 such as scale or surface area, not chemical  
19 engineering.

20 The chemical reactions of a  
21 nanoscale material can change from that of the  
22 bulk substance from which it is derived. But

1 the chemistry of the chemical is not  
2 necessarily altered.

3 It is the new properties that make  
4 nanochemicals synthetic. These new property  
5 changes can be even more striking than those  
6 created through the application of traditional  
7 synthetic chemistry. For example, safe  
8 chemicals at the bulk scale can become  
9 dangerous at the nanoscale.

10 The huge increase in surface area  
11 alone in a nanoscale chemical makes it much  
12 more highly reactive than the bulk scale  
13 chemical. But the ionization and the surface  
14 charge of the chemical may or may not change.

15 Chemicals that are not soluble at  
16 the bulk scale can be soluble at the  
17 nanoscale. The agglomeration potential of the  
18 chemical changes also results in a larger  
19 particle size in many cases with a surface  
20 area far greater than that of a dense particle  
21 of the same chemical. When two nanochemicals  
22 are fused together, even more differences can

1 appear.

2 In conclusion, nanochemicals  
3 represent a new kind of synthetic not  
4 envisioned by the makers of the National List.  
5 Nanotechnologies are synthetic in that they  
6 are intentionally engineered to take advantage  
7 of their properties at the nanoscale.

8 Moreover, if nanotechnology and  
9 the knowledge we have now about its hazards  
10 was known when OFPA was written, we are  
11 confident that it would be considered an  
12 excluded method and excluded substance akin to  
13 genetic engineering. That is precisely how we  
14 believe the Board should treat these  
15 substances today and in the future.

16 There will always be additional  
17 studies needed for us to better understand how  
18 emerging technologies affect the environment  
19 and human health. But the NOP must not wait  
20 until all of these studies are completed  
21 before prohibiting nanotechnologies and  
22 synthetic nanomaterials and particles.

1                   The NOSB should take immediate  
2                   precautionary action to keep nanomaterials out  
3                   of organics before nanotechnologies are  
4                   infused into our food supply

5                   Defining engineered nanomaterials  
6                   as synthetic substances alone is not  
7                   sufficient to protect the integrity of USDA  
8                   organic. Therefore, we urge you to put  
9                   nanotechnology and engineered nanomaterials in  
10                  the same category as sewage sludge,  
11                  irradiation, and genetically-engineered crops.  
12                  And prohibit the substance and the methods.

13                  Thank you for the time. And I'd  
14                  be happy to answer any questions.

15                  CHAIRPERSON GIACOMINI: Thank you.

16                  Any questions?

17                  (No response)

18                  CHAIRPERSON GIACOMINI: Okay. I  
19                  have one. I think your comments online were  
20                  the ones -- was the one -- and my brain is --  
21                  I won't use the term I usually would use but  
22                  it is a little fried right now -- the

1 potential examples we talked about were just  
2 not practical and not real world, whatever it  
3 is, but that's the part that I kind of  
4 disagree with.

5 I agree with most of where you are  
6 going. But I'd like to present just a very  
7 quick scenario. And I'd like you to give me  
8 an idea of what you want to do with it -- what  
9 you would do with it. Complete prohibition of  
10 nano, a company, middle of anywhere, a  
11 municipal area, on a municipal water supply.

12 Nano is coming and we're going to  
13 have a hard time stopping it. A water company  
14 decides to put water filters in their  
15 municipal water supply with nanosilver in it.  
16 Maybe at a very low level but there is some  
17 slough off and it can be measured at very low  
18 levels in that water supply.

19 With a complete prohibition on  
20 nanotechnology, should that then put any  
21 organic processing facility in that municipal  
22 water supply that has absolutely no control

1 over that water supply, should that put them  
2 out of business as organic?

3 MS. NILES: I think that's a great  
4 question. And first I'd like to add that I  
5 may have to consult with CFS and ICT on some  
6 of these questions since I'm here as a proxy  
7 today.

8 I would add, though, that I did  
9 give a talk to some water treatment employees  
10 at the National Association of Clean Water  
11 Agencies about a year ago. And nanosilver is  
12 actually something they are very concerned  
13 about as something that they would be able to  
14 keep out of the water supply.

15 So I actually think that most  
16 pretreatment and water agencies are thinking  
17 about it from an opposite perspective and  
18 viewing nanotechnologies and nanosilver as a  
19 threat to their integrity of water  
20 purification.

21 With regards to the rest of the  
22 question, to be honest, I don't feel

1 comfortable commenting on behalf of the CFS  
2 for that. But I would be very happy to check  
3 with Jaydee on that issue and get back to you  
4 about it.

5 CHAIRPERSON GIACOMINI: Okay.

6 Joe?

7 MEMBER SMILLIE: Briefly, the use  
8 of titanium dioxide and zinc oxide in personal  
9 care sun screen products, is that all in  
10 nanotechnology or are you familiar, are those  
11 products effective in the non-nanoscale?

12 MS. NILES: My understanding about  
13 that technology is that it's nano for the  
14 reason that it will cause sun screens to go on  
15 clear rather than cause them to go on white.  
16 So in this case you have a situation where it  
17 is actually a technology for a very cosmetic  
18 purpose and not necessarily for a health  
19 purpose or a purpose that would be beneficial  
20 for public health for example.

21 So my understanding is that there  
22 are both technologies there. The nano version



1 of it is so that the sun screen will go on  
2 clear.

3 MEMBER SMILLIE: Thank you.

4 MS. NILES: Thank you very much.

5 CHAIRPERSON GIACOMINI: Thank you.

6 David Bronner, Cheryl van Dyne, J.  
7 Friedman.

8 MR. BRONNER: Hello. I'm David  
9 Bronner, President of Dr. Bronner's Magic  
10 Soaps. I was going to talk a lot about soaps  
11 and alkaline and why potassium and sodium  
12 hydroxide should continue to be listed.

13 I'll talk on that briefly but then  
14 I want to address the NOP letter to NOSB on  
15 personal care.

16 So the voluntary certification of  
17 soaps under the NOP has been very successful.  
18 Dr. Bronner's on reliance of the NOP scope  
19 statement, as certified in 2003, following  
20 Twin Craft and Bradford, the two largest  
21 private label soap manufacturers in the United  
22 States to be certified in 2002.

1                   We've invested three million in  
2                   some costs in developing fair trade organic  
3                   grower projects for coconut oil in Sri Lanka,  
4                   palm oil in Ghana, olive oil in Palestine and  
5                   Israel, and mint oil in India. This supports  
6                   over 1,000 organic farmers in 10,000 acres.

7                   As far as the alkali that we use,  
8                   traditionally for melaneous, the alkali was  
9                   made by leaching ashes or you could burn  
10                  biomass and you reach the ashes and you get  
11                  alkali and that was how you made soap.

12                  It's not an appropriate way of  
13                  doing that on a large scale. It's very -- if  
14                  all the alkali in the world came from that  
15                  process, you would be burning a lot of  
16                  biomass. So the NOP properly has alkali from  
17                  seawater.

18                  Basically you run electricity  
19                  through potassium chloride or sodium chloride.  
20                  You separate and get your alkali that way.  
21                  There are a few different processes and in my  
22                  written comments, there's better ones and

1 worse ones. And the good one is winning out  
2 and taking over the production, which is  
3 membrane cell productions.

4 Energy efficient, there is no  
5 mercury contamination.

6 And also I appreciate the  
7 Materials and Handling Committee, that  
8 worksheet, you know, soap works great. And,  
9 you know, some comments made earlier about  
10 chemical changes in foods. I mean like milk  
11 caramel and you just cook sugar and milk and  
12 there is a maillard reaction and, you know,  
13 there's no sugar and there's no milk. I mean  
14 it's milk caramel.

15 You know, it's similar to the  
16 soap. And it's all organic and I feel it is  
17 very much within the spirit of the organic  
18 program. It's simple and more similar to  
19 making tofu than it is modern detergent  
20 manufacturing.

21 So the NOP, the letter to NOSB  
22 references that like the 2005 statement as

1 like a departure from previous NOP policy.

2 And in 2005 all of a sudden NOP says personal  
3 care is allowed. And, you know, before that  
4 wasn't NOP's position.

5           Actually the NOP launched -- so in  
6 May 2002, the original policy scope of the  
7 national organic program, which is very  
8 difficult to find but, you know, I found it,  
9 so it states producers and handlers of any  
10 agricultural commodity or product, whether raw  
11 or processed, including any commodity or  
12 product derived from livestock that is  
13 marketed in the United States for human or  
14 livestock consumption may seek certification  
15 under the NOP as an organic producer or  
16 handler.

17           Please note, the term consumption  
18 is not limited to products that are used for  
19 food. Specifically we have been asked if the  
20 regulations under NOP apply to the following  
21 products, class of products, and production  
22 systems: mushrooms, pet foods, aquatic

1 animals, fabrics, cosmetics, body care  
2 products, over-the-counter medications,  
3 dietary supplements, and other stuff.

4 Because these and other products,  
5 classes of products, and production systems  
6 contain agricultural products, the producers  
7 and handlers of such products, classes of  
8 products, and production systems are eligible  
9 to seek certification under the NOP.

10 So the NOP launched with the  
11 explicit invitation to personal care to  
12 certify. And we were not the first. We  
13 followed the two biggest soap manufacturers.  
14 We were like, you know, okay, we're going for  
15 it.

16 You know so this wasn't like  
17 something that we pushed on NOP. We followed  
18 what, you know, we just thought this is how it  
19 went.

20 Just quickly on the ag versus non-  
21 ag, I mean it's not like clothes. Like I've  
22 got a nylon shirt and I say it's organic. I

1 mean and I can't say oh, it's non-ag so you  
2 can't do anything about my non-ag organic,  
3 nylon shirt.

4 I mean personal care the same say.  
5 We can't control it being organic and  
6 agricultural. And anyways -- so and then  
7 Leahey, there's a statement of the Leahey  
8 after the rescinding of the statements from  
9 Benneman. Leahey, you know, basically says  
10 NOP, the NOP should be going after all these  
11 organic -- all these other product classes and  
12 there shouldn't be these loopholes.

13 So that's it.

14 CHAIRPERSON GIACOMINI: Thank you.

15 Questions?

16 (No response.)

17 CHAIRPERSON GIACOMINI: Okay.

18 Thank you.

19 All right. We will not bring  
20 dinner in. We will not bring cots. We've  
21 been an hour and a half since the last break.  
22 We probably have -- oh, it could be another

1 hour and a half to go. Hour to an hour and a  
2 half. Do we want to take a break or just  
3 allow people to take breaks on their own?

4 Steve says keep going -- is it to  
5 keep going?

6 PARTICIPANT: Yes.

7 CHAIRPERSON GIACOMINI: All right.

8 Let's rock and roll.

9 Cheryl, Jay is bypassing his time.  
10 Susan Cheney and Harriett Behar.

11 MS. Van DYNE: Okay. I'm make it  
12 brief.

13 Thank you very much for giving me  
14 the update. My name is Cheryl van Dyne. I am  
15 with C. P. Kelco and Huber Engineered  
16 Materials. I'm Global Regulatory Affairs  
17 Manager for -- they are J. M. Huber Companies.

18 Many years ago we submitted the  
19 Gellan petition. And Gellan has made it to  
20 rulemaking. And so I look forward, our  
21 customers look forward, we, as a company that  
22 manufactures food additives, we provide these

1 to the industry as asked. And we don't  
2 certify our products organic.

3 And so we've been through quite a  
4 bit with this. You know I've come to the  
5 meetings and I've really learned an awful lot  
6 in the process.

7 One thing I would like to ask --  
8 Miles isn't here but the visibility that we  
9 don't have in terms of our petition material  
10 as an industry is really disturbing. We --  
11 you know, I come, I ask, I talk to Mark, I  
12 talk to, you know, Bob Pooler, I talk to you  
13 guys. Where is it? Where is it?

14 Industry really doesn't have any  
15 idea what's going on. And I'd like to ask  
16 that perhaps we could, with the new staffing,  
17 that the industry maybe could get a little  
18 more visibility.

19 I do have my contacts. And I do  
20 have my insides. But it is a difficult thing.

21 The other -- anyway, thank you  
22 very much for getting Gellan so far along. I



1       guess we're at the point where it is going to  
2       be downhill pretty soon.

3               The other part of why I'm here is  
4       I'm representing IFAC. They've asked me to  
5       speak. It is the International Food Additive  
6       Council.

7               We did present public comments.  
8       Glenn Nabors provided them. But I'm not going  
9       to read them. You all have them. I printed  
10      them out again not knowing that I shouldn't  
11      have done that. But not to be no Green. But  
12      anyhow, Michelle and Valerie will pass them  
13      out.

14              But one of the things that we  
15      would like to ask is that in the letter, that  
16      this is group is like our company. We're  
17      members of this. They are industry folks,  
18      companies, that because their customers asked  
19      them to petition these materials and represent  
20      them, that they would like to see the National  
21      Organics Standards Board look at the Sunset  
22      materials that are on the 605 and the 606 as

1 being needed the industry. We represent  
2 industry as manufacturers. And industry comes  
3 to us, the Jams & Jellies group, you know, our  
4 different customers and ask us to support  
5 these.

6 So we ask you to support  
7 nominating these materials again for sunset.  
8 And, again, I won't read them. It's the  
9 materials that we've submitted.

10 And with that, I'm going to  
11 conclude. This has been a long day.

12 CHAIRPERSON GIACOMINI: Questions?

13 (No response.)

14 CHAIRPERSON GIACOMINI: Okay.

15 Thank you.

16 MS. Van DYNE: Thanks.

17 CHAIRPERSON GIACOMINI: Susan  
18 Cheney, Harriett Behar with a proxy, and  
19 Nicole Dehne.

20 MS. CHENEY: Hello. I'm Susan  
21 Cheney, Director of Regulatory Affairs from  
22 Martek Biosciences Corporation.

1                   In light of yesterday's policy  
2                   change announcement regarding accessory  
3                   nutrients and the time of day, my comments are  
4                   going to be brief. Martek will be submitting  
5                   a petition for our DHA and ARA food  
6                   ingredients. And we look forward to working  
7                   with you during a fair and transparent review  
8                   process.

9                   Martek would also like to thank  
10                  the Program for confirming that ample time  
11                  will be given to ensure a smooth transition  
12                  during this policy change. And we will also  
13                  be submitting further comments regarding the  
14                  accessory nutrients technical review that was  
15                  made public today.

16                  I've provided Valerie a copy of  
17                  our original written comments for your review.  
18                  And I thank you for your time.

19                  CHAIRPERSON GIACOMINI: Questions?

20                  Joe?

21                  MEMBER SMILLIE: Could you clarify  
22                  the use of hexane because that seems to be one

1 of the areas that I'd like to just find out --  
2 get some more information on.

3 MS. CHENEY: Martek employs  
4 several different microbial sources to produce  
5 our products. And those specific microbial  
6 sources will use a different processing  
7 method.

8 Our comments will address -- our  
9 petition will address these various processing  
10 methods that are used with the different  
11 microbial sources. In the interest of time,  
12 hexane can be used within this process.

13 MEMBER SMILLIE: So hexane, if  
14 necessary, but not necessarily hexane.

15 MS. CHENEY: Hexane, depending on  
16 the source, may be used.

17 CHAIRPERSON GIACOMINI: Other  
18 question?

19 (No response.)

20 CHAIRPERSON GIACOMINI: Thank you.

21 Harriett Behar, Nicole Dehne, I  
22 think, and Dave DeCou.

1 MS. BEHAR: Hello. Long day. But  
2 if I don't read my husband's proxy, he'll be  
3 very angry.

4 CHAIRPERSON GIACOMINI: That's  
5 okay. We won't tell.

6 MS. BEHAR: What's that?

7 CHAIRPERSON GIACOMINI: We won't  
8 tell.

9 MS. BEHAR: Oh, you won't tell?  
10 He'll find out.

11 (Laughter.)

12 MS. BEHAR: Okay. You should have  
13 my comments in front of you, I hope. My name  
14 is Harriett Behar and I'm the Organic  
15 Specialist for the Midwest Organic and  
16 Sustainable Education Services, MOSES, which  
17 aids organic and transitioning to organic  
18 farmers to improve their farms and the greater  
19 environment through organic production.

20 And I have a few short comments on  
21 a variety of subjects.

22 I have seen a thread of similarity

1 through many of the recommendations and  
2 discussions posted for this meeting that go  
3 back to a long-standing issue since the  
4 inception of the NOSB.

5           There is a lack of complete  
6 science-based Technical Advisory Panel reviews  
7 by competent organizations with a deep  
8 understanding of the criteria within the OFPA  
9 for materials approval as well as the  
10 background in organic production to help them  
11 know where and how to compile the information  
12 needed to verify compliance to that criteria.

13           The NOSB should not be expected to  
14 the research and discovery on any of these  
15 materials. You neither have the time nor the  
16 expertise in all matters to do these  
17 effectively or efficiently.

18           Not only should all new materials  
19 have TAB reviews but sunset materials as well.  
20 It is understood that these two reviews would  
21 be different since they address different  
22 criteria. However the proposal put forth to

1 have suppliers, users, or others provide  
2 information to the NOSB on sunset would not  
3 provide the complete and diverse information  
4 needed for the NOSB to make their decisions  
5 since most organic producers are busy making  
6 a living and do not monitor the NOSB process.

7 Items on 606 should also have TAB  
8 reviews with another criterion including not  
9 only is it currently available but could it  
10 become available within a reasonable time. It  
11 has been used instead as an excuse to not pre-  
12 contract with possible organic suppliers to  
13 make these 606 items since because it is not  
14 readily available as organic, they do not need  
15 to do the legwork to provide the environment  
16 so it could be produced organically.

17 I believe a variety of TAB  
18 contractors should be educated by the NOP  
19 staff and Emily Brand-Rosen, among others,  
20 could help with this task. To expect an  
21 organization to be able to take on this unique  
22 function of doing TAB reviews without any

1 training or background results in poor TABs  
2 and delayed decisions.

3 The NOSB should ask the NOP to  
4 begin this task as soon as possible since to  
5 build a variety of well-trained TAB  
6 contractors could take years and the sooner we  
7 start the better.

8 I support the minority opinion  
9 dealing with the feeding of milk from organic  
10 animals treated with medicines that have  
11 withholding time. Removing the young from the  
12 mother for this short amount of time will not  
13 affect the bonding process.

14 Unless the farmer only has one  
15 animal, there would be other sources of  
16 organic milk on the farm for the young. And  
17 it is actually common practice for dairy farms  
18 to have nurse cows who suckle calves that are  
19 not their own offspring.

20 The amount of milk that would be  
21 dumped is not huge but the risk to the young  
22 fed tainted, non-organic milk from ill mothers



1 is great.

2 Please consider the points made by  
3 the minority opinion and not only the fact  
4 that the farmers have to do something with  
5 this milk. These young animals are the future  
6 organic production stock on the farm and they  
7 should be the best, not the second rate  
8 products.

9 This milk is not organic for  
10 humans or the animals offspring. I do not  
11 support the small, Made with organic seal on  
12 the back label of the package. Producers who  
13 use the Made with organic label may have  
14 chosen to go with this designation because  
15 they do not want to use a commercially  
16 available organic product for economic or  
17 other reasons. This should not be rewarded.

18 If there is abuse of the Made with  
19 organic label, this should be brought to the  
20 attention of the NOP Compliance and  
21 Enforcement Division and not dealt with by  
22 lessening the value of the USDA organic seal.

1 Producers who are in the 95 to 100 percent  
2 organic category have earned that prize, not  
3 the Made with organic producers.

4 I agree with the sentiments of the  
5 Livestock Committee and the frustration as we  
6 wait for viable alternatives to methionine.

7 I also believe that stocking rates and true  
8 access to the outdoors on more than just bare  
9 ground would also contribute to a lessened  
10 need for synthetic methionine in the poultry  
11 diet.

12 The management of organic poultry  
13 needs to be addressed as well as the current  
14 abuses we have occurring where organic birds  
15 of all types never see the sun or a blade of  
16 grass. The need for synthetic methionine has  
17 never been studied in what I would consider a  
18 true organic system. So it is difficult to  
19 say how much it is really needed.

20 Lastly, as a member of the ACA  
21 Apiculture Task Force, I encourage you to  
22 review the ACA Apiculture proposed standards.

1 I believe you will find this a good starting  
2 place to tackle the needs of this unique  
3 production system.

4 Now I'm going to go to Aaron's.  
5 I'm just going to talk about honeybees.

6 This is for my husband, Aaron Bin,  
7 who is the Inspection Manager at MOSA. So  
8 there is a little confusion in the family. I  
9 work for MOSES. He works for MOSA.

10 MOSA hopes that the NOSB and the  
11 NOP will respond to the needs of organic  
12 beekeepers and vendors and develop national  
13 organic standards for apiculture. While some  
14 of the livestock standards can be applied to  
15 apiculture, an insect's life cycle and needs  
16 are quite different from animal life and  
17 require additional standards in our view.

18 We at MOSA are supportive of the  
19 Accredited Certifiers Association guidance on  
20 apiculture published in October 2009. The ACA  
21 Apiculture Working Group was a broad-based  
22 committee of nine certifiers with

1 participation of agencies from Hawaii to  
2 Vermont. This group struggled with many  
3 issues and reached consensus on most of them.

4 Because European and Canadian  
5 apiculture standards were published after the  
6 NOSB Apiculture Task Force Standard of 2001,  
7 this standard needs to be updated. MOSA  
8 supports taking into account Canadian and  
9 European apiculture standards and harmonizing  
10 with these standards where possible.

11 MOSA supports the ACA vision on  
12 how wide an area is needed for organic bee  
13 forage. ACA guidance has both a forage zone  
14 and a surveillance zone. An organic bee  
15 forage zone of 1.8 mile radius harmonizes with  
16 Canadian and European forage areas while an  
17 additional less restrictive surveillance zone  
18 with a 2.2 mile radius still maintains the  
19 original NOSB concept of a forage zone with a  
20 four mile radius.

21 MOSA also supports a one year  
22 transition for bee colonies and hive

1 equipment. At the beginning of the transition  
2 period, the bees would be required to draw out  
3 wax comb under organic management. Beekeepers  
4 now understand that wax absorbs chemicals  
5 applied inside and outside the colony,  
6 resulting in a toxic bee brood nest and toxic  
7 food storage of honey and pollen.

8 We feel that replacement bees  
9 purchased to populate hives that could not  
10 survive the winter or dearth period could be  
11 purchased from conventional sources and  
12 managed in organic wax combs with a shorter  
13 transition of 60 days.

14 However, we want to limit  
15 replacement bees to 25 percent of the hives  
16 present in the previous honey flow. This  
17 would encourage beekeepers to develop their  
18 queen and colony genetics and manage bee  
19 diseases and pests so their apiaries could  
20 become stronger, healthier, and self  
21 sustaining.

22 But finally we believe that pest

1 control materials to help manage varroa mite  
2 infestations should be reviewed and petitioned  
3 for addition to the National List. These  
4 would include formic acid, thymol, and carbon  
5 dioxide.

6 In addition, if folic acid, lactic  
7 acid, or oxalic acid become recognized by the  
8 EPA for use in honey bees, these materials  
9 should also be petitioned and considered for  
10 inclusion on the National List.

11 Thank you.

12 CHAIRPERSON GIACOMINI: Thank you.

13 Questions?

14 (No response.)

15 MS. BEHAR: Good. Tell them to  
16 give TAB reviews.

17 CHAIRPERSON GIACOMINI: Thank you.

18 Nicole, Dave DeCou, and -- Nicole?  
19 No Nicole.

20 MS. FRANCES: Dave already gave up  
21 his spot.

22 CHAIRPERSON GIACOMINI: And Dave

1 is passing.

2 Moving quickly, the speaker from  
3 Earthwise, is she here? Rather than my trying  
4 to say that again and get laughed at.

5 Paul Browner? They're dropping  
6 like flies.

7 Bob McCain? McClain, I'm sorry.

8 MR. McCLAIN: Thank you. My name  
9 is Bob McClain. I'm the Research and Field  
10 Director for the California Pear Advisory  
11 Board. I'm here to talk about  
12 oxytetracycline.

13 And, Valerie, could I have that  
14 slide up? I'm not going to go into some of  
15 the things that my northwest friend went into.  
16 I'm just going to -- I would like you folks to  
17 see some of the photographs of what a blighted  
18 orchard looks like.

19 And if you would give us the first  
20 one, that is a cluster of pear blooms infected  
21 with fire blight. And that is a bud spur with  
22 that little yellow thing. Down on the right-

1 hand side is a blight ooze that insects get  
2 into and spread around to other green tissue.

3           Could I have the next one? And  
4 that is a pear shoot that is recently  
5 infected. And, of course, that's the other  
6 green tissue where insects transmit that  
7 blight bacteria.

8           That is a small pear, about as big  
9 as my little finger or whatever, that is  
10 infected with blight bacteria. And that  
11 bacteria can be airborne. So it is not a case  
12 of just being limited to one tree. If you  
13 have a wound, a hail mark, or something like  
14 this, a torn leaf or something like that and  
15 that bacteria gets into it, it could come from  
16 a pear like this.

17           Could I have the next one? And  
18 that is -- it's kind of hard to see but all  
19 those little flags around the top are blight  
20 strikes.

21           Next? And that is the base of a  
22 tree like that where the grower has attempted



1 to scrape away the blight infection out of the  
2 cambium but it has also gone down all the way  
3 into the ground of the root stock. So that  
4 tree is as good as dead.

5 Next please. And that is a  
6 salvaged pear tree, I'd say about an eight- or  
7 nine-year old tree. And you can see where it  
8 has been scraped at the base as well. But  
9 they have been able to save it. But they've  
10 taken all the scaffolds out of it.

11 All of the fruit-producing wood is  
12 gone and you are basically left with sort of  
13 a non-producing tree for the next three or  
14 four years until you get new shoots to develop  
15 new fruit wood out of it.

16 And I'd just like to say a little  
17 bit about alternatives to terramycin. One of  
18 the things -- I know there was a fellow here  
19 talking about Kocide 3000. And we use that  
20 conventionally. It does a very good job for  
21 us. And hopefully you folks will be able to  
22 see that the inner ingredients will comply

1 with your standards.

2 We use a couple of biologicals,  
3 Blight Ban 85-06, and another one called  
4 Bloomtime. There is similar colonization,  
5 bacteria which colonizes the nectaries of the  
6 flowers before the blight bacteria gets into  
7 it. And basically it denies the blight  
8 bacteria the food source in the nectaries.

9 The other products we have, of  
10 course, are copper products. Coppers tend to  
11 russet smooth-skinned pears like the Bartlett,  
12 Comice, Seckel, and those varieties, which is  
13 actually a great defect in the business as far  
14 as USDA is concerned.

15 And then you have the streptomycin  
16 which you hear in California has some issues  
17 with resistance. And then, of course,  
18 terramycin which we have no resistant issues.  
19 And so we're kind of -- we're really concerned  
20 in the industry, particularly with the organic  
21 people, that they are going to lose their  
22 orchards when this product sunsets.

1 Do you have any questions?

2 CHAIRPERSON GIACOMINI: Questions?

3 (No response.)

4 CHAIRPERSON GIACOMINI: Thank you.

5 MR. McCLAIN: Thank you.

6 CHAIRPERSON GIACOMINI: Dan Todd?

7 (No response.)

8 CHAIRPERSON GIACOMINI: Tony

9 Avedo, is he still here?

10 (No response.)

11 CHAIRPERSON GIACOMINI: Nancy

12 Cook? Nancy Cook, okay.

13 MR. TODD: Well, thank you for  
14 your sitting through all of this testimony.

15 It can't be easy to do that.

16 My name is Dan Todd. I'm an  
17 organic pear grower. I've been doing that  
18 since 1986. I'm one of the -- maybe not the  
19 first wave but an early generation organic  
20 farmer.

21 I had farmed for ten years  
22 conventionally. And I switched over to

1 organic because that was the way I wanted to  
2 farm.

3 I realize that the passing  
4 diseases don't go away when you become organic  
5 like some people would like to think so. They  
6 are still there. Some pests become less of a  
7 problem, some that you've never heard of or  
8 even thought of show up and become  
9 devastating.

10 I've had my orchard defoliated by  
11 pear slug. I've had pear scab, which is an  
12 ongoing problem with pear. They affect my  
13 entire crop in those 25 years, three or four  
14 times where I couldn't sell any fruit into the  
15 fresh market.

16 I had to look at what were my  
17 tools, what were my alternatives for  
18 controlling things with organic products. And  
19 a lot of the early research on organic  
20 materials was done on my farm.

21 When I started trying to this,  
22 there was nobody to talk to. There was nobody

1 to say how do you do this, how do you control  
2 these pests because there were almost no  
3 organic pear growers around. Bill Denevan,  
4 who some of you know, is in the back and he  
5 was doing that.

6 I worked with the university with  
7 Dr. Falcon and Dr. Walter on some of the  
8 materials that even conventional growers use  
9 today.

10 I'm here to talk specifically  
11 about the removal of tetracycline as a tool to  
12 control fire blight in pears effective October  
13 2012. But before I do, I need to address  
14 briefly the NOSB Sunset materials list, some  
15 of which are to be reviewed at the spring  
16 meeting and some at the fall meeting.

17 All metal sulfur, lime sulfur,  
18 horticultural oils, pheromone, coppers,  
19 streptomycin, and tetracycline are all on that  
20 list, with tetracycline being actually removed  
21 effective October 2012.

22 These are the tools that I

1 discovered I could use when I moved to organic  
2 farming. And I've used them, all of these  
3 materials, and those are the only materials I  
4 have to control most of the pests, insects,  
5 and diseases that I face.

6 Without them I could not continue  
7 to farm pears organically. It would not be  
8 possible.

9 Back to tetracycline.  
10 Tetracycline is a vital tool to control fire  
11 blight. You've seen the pictures of the  
12 damage that fire blight can do. I have had  
13 pear trees with over 200 blight strikes per  
14 tree. When you are done pruning that tree  
15 what you end up with is a stump about yea big.  
16 That might be all you have left.

17 As a grower that has planted trees  
18 and orchards and farmed trees that my  
19 grandfather and my father have farmed, that's  
20 not a pretty picture. It's not fun to look  
21 out there and see all that work be cut down.

22 Last year on June 3rd I was hit

1 with the worst hailstorm I have ever seen.  
2 Hail as big as my thumb. And I have big  
3 thumbs.

4 Besides the damage to the crop,  
5 every torn leaf or pear was a potential entry  
6 point for the blight bacteria. Within 24  
7 hours, I sprayed every part of my 50 acres  
8 with tetracycline.

9 As the growing season progressed,  
10 I could see that the last areas to be sprayed  
11 in that 24-hour period had indeed developed  
12 significant blight. That's how critical the  
13 timing is of what we do and how we face these  
14 problems, these diseases. I sprayed most of  
15 the night that night to protect my trees and  
16 my crop.

17 This last part, I have a minute  
18 left, I am going to take the Board to task a  
19 little bit. I believe that this Board's  
20 backdoor removal of tetracycline effective  
21 October 2012, intentionally bypassing the  
22 Sunset review criteria, has taken away an

1 important material for organic pear growers.

2 Two things were clear to me from  
3 reading the transcripts of the November 19th,  
4 2008 tetracycline vote. I wish I had time to  
5 read more of this to you but the two things I  
6 came away with from that, one is that this  
7 Board wants to remove tetracycline from  
8 organic use. That seems very clear.

9 CHAIRPERSON GIACOMINI: That was  
10 the buzzer also. So wrap -- it was a  
11 different buzzer but they both went off.

12 MR. TODD: They were buzzers both  
13 for me.

14 CHAIRPERSON GIACOMINI: Okay.

15 MR. TODD: Okay. The second point  
16 and I'll wrap this up quickly, the second  
17 point is that this decision could not have  
18 been made using Sunset review criteria.

19 I end with a quote from Mr.  
20 Smillie from that, from the transcript, and  
21 stick with the date that we have here to allow  
22 the growers hopefully to find some materials



1 they can use. Now that's not an exact quote  
2 because I didn't finish writing it down.

3 But the problem I have is that  
4 there are no other materials that we have  
5 effectively to use. It effects my life, my  
6 home, my family, those kinds of things.

7 You've had people talk about  
8 millions of dollars today. That's not me.  
9 I'm a small grower. But you know what? It's  
10 my whole life. And I don't know if you have  
11 any questions.

12 CHAIRPERSON GIACOMINI: Questions?  
13 Katrina?

14 MEMBER HEINZE: Perhaps a question  
15 for someone on the Crops Committee. I guess  
16 I'm a little bit confused. Is there a date?  
17 Because I don't see that it comes off without  
18 a separate Sunset.

19 MR. TODD: It's not allowed to  
20 just go through the Sunset Review. Or that's  
21 the recommendation from the Board. It said it  
22 would not --

1                   CHAIRPERSON GIACOMINI: Was that -  
2                   - what is that -- when did that come out,  
3                   Miles?

4                   MR. McEVOY: Yes, there is a  
5                   proposed rule that went out in --

6                   CHAIRPERSON GIACOMINI: A proposed  
7                   rule.

8                   MR. McEVOY: -- oh, what was that,  
9                   the comment period closed on May -- March  
10                  15th, somewhere around there, mid-March, on  
11                  tetracycline and sulfuric acid. And I  
12                  believe, Shannon, what the proposed rule had  
13                  that tetracycline would Sunset -- or not  
14                  Sunset -- would expire after October 2012.  
15                  And that was based on the LSB recommendation  
16                  from November 2008, I believe.

17                  PARTICIPANT: That is right.

18                  MS. NALLY: Thank you.

19                  CHAIRPERSON GIACOMINI: Correct.

20                  Any other questions?

21                  (No response.)

22                  CHAIRPERSON GIACOMINI: Thank you.

1                   Okay. I don't believe Tony Avedo  
2                   is here. Nancy Cook and Marty Mesh. Is Laura  
3                   here to still speak? Okay. Okay.

4                   MS. COOK: Well, good afternoon,  
5                   evening, where I'm from this is pretty late  
6                   guys.

7                   Thank you very much for allowing  
8                   us all to come in today and talk to the  
9                   hardest working Board I think I've ever met.  
10                  I'm Nancy Cook from Pet Food Institute based  
11                  in Washington, D.C. And we represent 98  
12                  percent of the dog and cat food that you find  
13                  in the US marketplace. And about a percent of  
14                  that -- percent, percent and a half of that is  
15                  organic pet food based on our best estimates.

16                  Now you think about that for a  
17                  minute and you say that's not such a big  
18                  piece. But then you realize that out of a  
19                  17.5 billion dollar industry, that's about 262  
20                  million dollars worth of pet food.

21                  And the thing that should make it  
22                  really interesting for this group is fully

1 half of that 262 million dollars is farm gate  
2 sales for producers of organic products.

3 That comes from the co-products of  
4 what everybody in this room produces, whether  
5 as Dave Carter mentioned earlier this morning,  
6 it's the parts from the critter that we have  
7 decided we aren't going to eat but our little  
8 friends with four legs really like or if it is  
9 the guy who is growing organic corn or organic  
10 wheat and he's got to do something with the  
11 co-products there, we take those co-products  
12 and put it into a product that is uniquely  
13 formulated to be the complete and balanced  
14 diet for that pet.

15 Unlike you and I, the dog or cat  
16 that gets fed a commercially-produced pet  
17 food, whether it is organic or not, it is all  
18 the nutrition that he needs to get out of that  
19 food. And he doesn't have to worry about  
20 going out and making sure he's got five  
21 servings of vegetables and three more servings  
22 of fruit. And making sure he's got his dairy

1 and his protein. We've already done that for  
2 him a whole lot easier than we've ever done  
3 before in this country or around the world.

4 In addition to that 17.5 billion  
5 dollars in sales that we do around the world -  
6 - or that we do in the US, we do another 1.3  
7 billion around the world. The folks at  
8 Foreign Ag Service call us the poster child of  
9 value-added agriculture because we take a  
10 million dollars in market access program funds  
11 and generate 1.3 in sales. It's pretty  
12 helpful.

13 What we want to do, as the pet  
14 food industry, is we want to be able to  
15 support the portion of the industry that is  
16 going to make good, solid, wholesome organic  
17 pet foods. And that's why we went out and got  
18 the best guy we knew to come and negotiate the  
19 rapids that are part of the deal with NOP and  
20 the NOSB.

21 I've had the opportunity to come  
22 speak before this Board on several occasions,

1 most recently as Chair of the Pet Food  
2 Committee that -- or the Pet Food Task Force  
3 that you folks put together. And we were  
4 happy to build a recommendation that the NOP  
5 accepted in 2008. And we were glad to hear  
6 that the pet food regs are on the calendar in  
7 2011. Thank you Miles, Arthur, and Mark. We  
8 really appreciate that.

9 And we also are meeting in our  
10 offices the week after next to kind of shake  
11 the bushes and make sure those folks are  
12 understanding what we have to do on the  
13 recommendations for the petitions that we will  
14 be filing.

15 So keep us together, expect  
16 information from us. Don't hesitate to  
17 contact me or Dave or any of the folks that  
18 you know are around because we'll do the very  
19 best we can for you.

20 And, again, thank you very much  
21 for the opportunity to come work with you,  
22 come visit with you. And these guys over

1 here, you have to feel sorry for them because  
2 they are probably going to see me fairly  
3 often.

4 (Laughter.)

5 MS. COOK: Thanks very much.

6 CHAIRPERSON GIACOMINI: Any  
7 questions?

8 (No response.)

9 CHAIRPERSON GIACOMINI: Thank you.

10 MEMBER SMILLIE: Just thanks for  
11 your work. We really appreciate it.

12 MS. COOK: Well, thanks, Joe. We  
13 decided a long time ago that the very best  
14 thing that we could do as a pet food industry  
15 was pay close attention to how the organic  
16 program got together so that it would be a  
17 good solid program all around.

18 And we appreciate all the work of  
19 this Committee. Thanks so much.

20 CHAIRPERSON GIACOMINI: Thank you.

21 Marty?

22 MR. MESH: It's always a bit

1       intimidating to be the last between this crew  
2       and the reception when the Chair especially  
3       has suggested to refrain from humor or  
4       tangential comments, especially if you are a  
5       guy like me. This after I thought we were  
6       going in reverse order this meeting so I  
7       strategically waited until the end to sign up.

8                       (Laughter.)

9                       MR. MESH: I want to thank Peggy  
10       in CCOF for giving me the rest of her unused  
11       minutes. To show my appreciation for CCOF, I  
12       have passed out a letter from Louis Ocunia and  
13       C.F. Rush concerning their support for growers  
14       in California and the Northwest and the effort  
15       to keep tetracycline on the list.

16                      CHAIRPERSON GIACOMINI: Marty, you  
17       have five minutes.

18                      MR. MESH: No, I have the proxy.  
19       Valerie?

20                      CHAIRPERSON GIACOMINI: You have  
21       your five minutes. You've had all day and all  
22       the time to prepare for it.



1 MR. MESH: You're killing me.

2 CHAIRPERSON GIACOMINI: You have  
3 your five minutes.

4 MR. MESH: But stop the clock,  
5 Tina.

6 CHAIRPERSON GIACOMINI: You have  
7 your five minutes. Thank you.

8 (Laughter.)

9 MR. MESH: It was handed to me by  
10 Bill Devin, a pioneer California organic  
11 farmer who probably I last saw before today in  
12 the early or mid-1990s at an NOSB meeting  
13 where we were discussing inerts. Given that  
14 history and the reality and the fact that I  
15 couldn't access the internet and review  
16 relevant documents, I stopped writing  
17 extensive and technical comments and instead  
18 I'm thinking we should focus on getting to the  
19 CCOF reception out of frustration and  
20 appreciation for Peggy's additional time,  
21 which now is being taken away.

22 (Laughter.)

1                   MR. MESH: For the new Board  
2 members, my name is Marty Mesh. I'm the  
3 Executive Director of Florida Organic Growers  
4 and our certification program, Quality  
5 Certification Services.

6                   I started farming organically in  
7 1972. On a larger scale in `76. We formed  
8 FOG 20 years ago. And today I serve on the  
9 Board of Directors of the ACA, the Southern  
10 Sustainable Ag Working Group, and the OTA  
11 Board, not to ever say that my comments  
12 reflect the opinion of the Organic Trade  
13 Association.

14                  A warm welcome to the new members  
15 and a reiteration of the thank you to Valerie  
16 for the years of work and patience you have  
17 shown with all of us and me personally.

18                  I want to thank the Program for,  
19 again, a transparent and full Program report  
20 and presentation yesterday. The competency  
21 and dedication of the staff is to be  
22 commended. And we are thankful for all of the

1 work.

2 I also want to reinforce and  
3 support the preliminary unofficial comments  
4 communicated by the Program that seem to lead  
5 in the direction that increased pesticide  
6 testing mandated in OFPA and identified in the  
7 OIG audit may be done by USDA and USDA labs  
8 with the cost borne by the increased funding  
9 that the NOP has received, which will make it  
10 much easier to fulfil the requirements in OFPA  
11 and have those results available.

12 They didn't say those exact words  
13 but I'm thinking that's what they meant.  
14 Those who want a material should be  
15 responsible for making the case to keep it on  
16 the list. That's what I've said before. And  
17 that position remains true.

18 While I believe institutional  
19 memory should be remembered when we talk about  
20 more easily updating annotations, the  
21 historical time lag and/or dysfunction of an  
22 underfunded government regulatory system that

1 at times can be in conflict with the more  
2 immediate needs of farmers and industry is  
3 frustrating.

4 While use of annotations were part  
5 of the public process, result in the decision  
6 to list materials in the first place, to  
7 narrow the use of a listed material by  
8 tightening up an annotation seems to be a no-  
9 brainer if the only thing that needs to be  
10 changed is the Board policy manual.

11 I don't really believe there  
12 exists a real alternative to methionine at  
13 this point. And if it was taken off the list,  
14 I believe we would see many less stores  
15 carrying organic eggs but conventional GMO  
16 grain, partially made possible by atrazine  
17 poisoning our water being used for all  
18 natural, free range eggs, which would  
19 proliferate.

20 Concerning Urvashi and the CU  
21 comments on fish, I want to put in my  
22 continuing plug for developing aquiculture

1 standards for low-hanging or maybe low-  
2 swimming species that are being managed in  
3 systems that can again be compliant and  
4 certified.

5 I hear again today how honey  
6 without specific standards can have a USDA  
7 logo on it when almost ten years ago Florida  
8 and Texas shrimp producers were told by the  
9 then-NOP manager that if they met the  
10 standards, were certified they, too, could be  
11 a USDA seal on the shrimp.

12 Thus they invested around a half a  
13 million dollars. We certified them. They  
14 marketed their shrimp. And then had USDA  
15 change their mind, order the removal of the  
16 USDA logo. They lost their major markets.  
17 And are both now bankrupt.

18 Concerning the hops issues and  
19 seeing the frustration of organic hops  
20 growers, maybe it would be fitting to just --  
21 maybe it would just be fitting to give a quick  
22 update on behalf of southern growers who have

1       been waiting for the petitioner who I  
2       advocated against for non-organic IQF okra to  
3       be added to the list to get in touch and offer  
4       a fair contract and have certified organic IQF  
5       okra.

6                   I believe that petition discussion  
7       was about three or four years ago. And the  
8       updates -- no contact ever.

9                   I'm almost finished. And I have a  
10      proxy. I really do.

11                   CHAIRPERSON GIACOMINI: No, you  
12      don't. Wrap it up.

13                   MR. MESH: The update, no contact  
14      ever. Those okra growers are still waiting  
15      and the okra continues to grow well  
16      organically in the south.

17                   One might remember several years  
18      ago a film maker being at the NOSB meeting in  
19      D.C. When she asked if she could interview me  
20      for a film and she said she was making a film  
21      about y'all and about organic agriculture and  
22      the NOP, I became very interested and

1 ultimately co-producer of the film.

2 The DVD is done and we're doing  
3 screenings at film festivals. And if the  
4 community would like to a screening, please  
5 get in touch.

6 And then the last closing comment.  
7 One question for John. When you take organic  
8 salad greens and you wash them and put them in  
9 a sealed up plastic bag that may heat up or  
10 even if they don't heat up, do they become  
11 synthetic?

12 (Laughter.)

13 CHAIRPERSON GIACOMINI: Any  
14 questions?

15 Tracy?

16 MS. MIEDEMA: I just have one,  
17 Marty. And it's non-okra. I've been saving  
18 this one.

19 Do you think chickens are range  
20 animals? Are chickens --

21 MR. MESH: We're out of time.

22 (Laughter.)

1 CHAIRPERSON GIACOMINI: Okay,  
2 folks.

3 That brings us to the end of our  
4 public comment. Thank you for staying with  
5 us. Thank the Board for staying with us.

6 (Applause.)

7 CHAIRPERSON GIACOMINI: Many of  
8 you sat through 11 hours. Many of us will now  
9 go to Committee meetings where we will look at  
10 and evaluate all the inputs we've taken.

11 We're now in recess until eight  
12 o'clock tomorrow morning.

13 (Whereupon, the above-entitled  
14 meeting of the National Organic Standards  
15 Board was concluded at 7:12 p.m.)

16  
17  
18  
19  
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22



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