

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 29, 2014

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The National Organic Standards Board convened at 8:30 a.m. at the Saint Anthony Hotel, 300 East Travis Street, San Antonio, Texas, Mac Stone, Chairperson, presiding.

MEMBERS PRESENT:

ROBERT "MAC" STONE, Chairperson  
JOHN FOSTER, Vice Chairperson  
CALVIN WALKER, NOSB Secretary  
HAROLD AUSTIN  
CARMELA BECK  
COLEHOUR BONDERA  
JOSEPH DICKSON  
TRACY FAVRE  
JAY FELDMAN  
WENDY FULWIDER  
NICHOLAS MARAVELL  
JEAN RICHARDSON  
ZEA SONNABEND  
JENNIFER TAYLOR  
FRANCIS THICKE

STAFF PRESENT:

MILES McEVOY, Deputy Administrator, National  
Organic Program

ANN MICHELLE ARSENAULT, Advisory Board  
Specialist

MELISSA BAILEY, Director, Standards  
Division, National Organic Program

LISA BRINES, Standards Division, National  
Organic Program

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

(9:06 a.m.)

MR. MCEVOY: Okay, we're going to get started here. Good morning. Thank you all for coming. I would like to open the spring 2014 National Organic Standards Board meeting.

MEMBER FELDMAN: Point of order, Mr. Chair. Point of order.

UNIDENTIFIED SPEAKER: Don't change sunset. Don't change sunset. Don't change sunset

AUDIENCE MEMBERS: Don't change sunset. Don't change sunset.

CHAIR STONE: Thank you all. Thank you all for bringing that to our attention.

AUDIENCE MEMBERS: Don't change sunset. Don't change sunset. Don't change

1 sunset.

2 CHAIR STONE: I think you all have  
3 made - made your point. At this time we will  
4 recess the meeting.

5 (Whereupon the above-entitled  
6 meeting went off the record at 9:03 a.m. and  
7 resumed at 9:06 a.m.)

8 MR. McEVOY: Okay. We're going to  
9 get started again. So --

10 MEMBER FELDMAN: Point of order --

11 MR. McEVOY: -- again --

12 MEMBER FELDMAN: Point of order,  
13 Mr. Chair.

14 MR. McEVOY: Yes, what? Thank  
15 you, Jay.

16 MEMBER FELDMAN: Thank you. With  
17 deep respect for your work, Mr. Chair, and the  
18 work of this Board, and your outstanding work  
19 in the community, I wanted to raise of point  
20 of order, please, that your chairing of this  
21 meeting is out of order.

22 It does not comply with the fact

1 that the underlying legislation, OFPA, the  
2 Organic Foods Production Act, Section 2119, 7  
3 USC 6518, the National Organic Standards Board  
4 Chairperson, subsection G, The Board shall  
5 select a chairperson for the Board, or the  
6 FACA rule, Final Rule 41 CFR Parts 101.6 and  
7 101.2, which says that this Board must operate  
8 under clear operating procedures.

9           The FACA rule also finds that the  
10 chair, if it shall be a member of the  
11 government, an official of the government such  
12 as yourself, Mr. Chair, shall be appointed by  
13 an agency head. This Board has received no  
14 such letter to that effect. And that there  
15 shall be clear rules in effect. This Board  
16 has, nor this community, has received any such  
17 rule.

18           And in fact, in your February 27  
19 memo to the National Organic Standards Board  
20 training summary, you state FACA requires that  
21 AMS and NOP guidelines for managing the NOSB  
22 provide clear operating procedures for the

1       conduct of advisory committee meetings and  
2       other activities, and describe the roles of  
3       the advisory committee members, the DFO and  
4       the staff.

5                        You have not done so, Mr. Chair.

6       And given that, and given the failure to  
7       comply with both the underlying enabling  
8       legislation and the FACA final rule, I would  
9       urge you, and I demand that we turn the gavel  
10      back over to the selected chair under our  
11      current operating procedures, as captured on  
12      page 13 and 14 in the PPM, which outlines the  
13      officers' responsibilities, including the  
14      election of the chair and selection by the  
15      Board. In officer responsibilities, it says,  
16      The chair is responsible -- please listen to  
17      this carefully -- is responsible to assure the  
18      integrity of the Board process including  
19      effectiveness of the meetings and the Board's  
20      adherence to its own rules. The chair shall,  
21      among other things, convene and preside at  
22      meetings.

1                   So while I have deep respect for  
2                   you, Mr. Chair, and your long history of  
3                   commitment and work to the organic community,  
4                   I also respect the history of this Board and  
5                   the processes that we have engaged in. I  
6                   respect the previous Boards, I respect the  
7                   members around this table, and I believe we  
8                   should revert back to our PPM and procedures  
9                   until such time as the USDA National Organic  
10                  Program, AMS, issues rules with clarity that  
11                  establish a new procedure and goes through the  
12                  appropriate public process to adopt those.  
13                  Thank you very much.

14                         MR. McEVOY: Thanks, Jay. So --  
15                                 (Applause.)

16                         MR. McEVOY: -- I just want to  
17                   point out that in -- under FACA and under the  
18                   NOSB's policies and procedures manual, that it  
19                   specifically says that the Designated Federal  
20                   Officer, who I am the Designated Federal  
21                   Officer for the National Organic Standards  
22                   Board, can chair the meeting when directed by

1 the Secretary of Agriculture or the  
2 Secretary's designee. That's right from the  
3 NOSB policies and procedures manual. And also  
4 under FACA, it's our responsibility as the  
5 Designated Federal Officer to open the  
6 meeting. That has been a responsibility that  
7 we haven't done in past meetings, but it's a  
8 requirement under FACA that we follow that.

9 So we'll continue on here with  
10 opening up the meeting, and --

11 MEMBER FELDMAN: -- order, Mr.  
12 Chair. I appeal from the decision of the  
13 Chair, and I ask for a second.

14 MEMBER BONDERA: I second that  
15 appeal.

16 MEMBER FELDMAN: Mr. Chair, I  
17 believe we have the authorization now to move  
18 forward with debate among all the Board  
19 members, which requires the Board -- a vote of  
20 this Board to continue this meeting under  
21 rules that are yet to be written or procedures  
22 that have not been published or discussed with

1 the public.

2 (Pause.)

3 MR. McEVOY: Okay. So let's hear  
4 the discussion.

5 MEMBER FELDMAN: You are -- under  
6 the rules, Mr. Chair, you are welcome to  
7 introduce the issue, make your comment and  
8 then call on Board members, if they would like  
9 to comment, and then close the session. Thank  
10 you.

11 MR. McEVOY: So, Zea.

12 MEMBER SONNABEND: Since we're  
13 being all Robert's Rules, I'd like to call the  
14 question.

15 MEMBER FELDMAN: Out of order.  
16 Point of order.

17 MEMBER SONNABEND: I'd like to  
18 proceed with the meeting, so I'd like to call  
19 the question. Thank you.

20 MEMBER FELDMAN: Mr. Chair, we  
21 have a motion on the table that requires a  
22 vote of the Board. We are allowed to debate

1 the issue, Mr. Chair, so I's appreciate it if  
2 you follow the rules and ask any Board members  
3 if they have any comments on this.

4 MR. McEVOY: Okay. So the  
5 question's been called so it ends debate, and  
6 the question's on the table then.

7 MEMBER FELDMAN: I appeal from the  
8 decision of the Chair which authorizes a  
9 discussion and a vote of the Board --  
10 requires, requires a discussion --

11 MR. McEVOY: No, we already  
12 asked --

13 MEMBER FELDMAN: -- and vote of  
14 the Board.

15 MR. McEVOY: -- for discussion, so  
16 we -- and then the question's been called, so.

17 MEMBER FELDMAN: I'd like to  
18 discuss this.

19 MR. McEVOY: So Jay, you've made  
20 your opening statement, and --

21 MEMBER FELDMAN: Right.

22 MR. McEVOY: Are there further

1 points that people would like to make on this  
2 issue?

3 (No audible response.)

4 MR. McEVOY: If not, then the  
5 question's on the table. All those in favor?

6 (No audible response.)

7 MR. McEVOY: All those opposed?

8 MEMBER SONNABEND: Aye.

9 MR. McEVOY: Please restate the  
10 motion. So the motion is -- Jay, can you  
11 repeat the motion?

12 MEMBER FELDMAN: The motion on the  
13 table is that we revert to the policies and  
14 procedures adopted by the Board of -- by the  
15 NOSB Board and revert the chair, the power of  
16 the chair, the power of the chairperson to the  
17 person selected by the Board to run this  
18 meeting, convene this meeting and run this  
19 meeting in accordance with the policies and  
20 procedures manual.

21 MR. McEVOY: Okay. Everybody got  
22 that? All those in favor?

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MEMBER FELDMAN: Aye.

MEMBER BECK: Aye.

MEMBER TAYLOR: Aye.

MR. McEVOY: We've got four ayes.

All those opposed?

MALE PARTICIPANT: Aye.

MALE PARTICIPANT: Aye.

MEMBER FELDMAN: I'll ask for a roll call, please, Mr. Chair. I ask for a roll call, please.

MR. McEVOY: All right. Let's start with Francis.

MEMBER THICKE: Aye.

MR. McEVOY: Wendy?

MEMBER FULWIDER: Aye.

MR. McEVOY: Nick?

MEMBER MARAVELL: Abstain.

MR. McEVOY: Tracy?

MEMBER FAVRE: Abstain.

MR. McEVOY: Carmela?

MEMBER BECK: Could I get

1 clarification on the vote, how I'm voting.

2 I'm voting against that.

3 MR. McEVOY: You're asking for  
4 clarification on the motion?

5 MEMBER BECK: Yes, one more time.  
6 I'm sorry. It's really long.

7 MEMBER FELDMAN: The motion is to  
8 revert to the PPM and confer the duties of the  
9 chair back to the selected chair of the NOSB.

10 MR. McEVOY: Okay.

11 MEMBER BECK: That's a no.

12 MR. McEVOY: Hold on just a minute  
13 here.

14 (Pause.)

15 MR. McEVOY: We're going to take a  
16 five minute recess so we can understand the  
17 process here. So I apologize for that, but  
18 we'll get started in a few minutes.

19 (Whereupon, the above-entitled  
20 matter went off the record at  
21 9:17 a.m. and went back on the  
22 record at 9:19 a.m.)

1 MR. McEVOY: So, thank you very  
2 much, Jay. Your motion is not a debatable  
3 ruling, so we're going to continue on here  
4 with introductory statements. And we're  
5 going to get into this in a lot of detail in  
6 terms of FACA and the Organic Foods Production  
7 Act and the NOSB policies and procedures  
8 manual. That's part of the introductory  
9 remarks.

10 Okay. Nice music, but --

11 MEMBER FELDMAN: May I just make a  
12 statement to close this out?

13 MR. McEVOY: Sure.

14 MEMBER FELDMAN: Thank you.

15 MR. McEVOY: Please.

16 MEMBER FELDMAN: Thank you, Miles.

17 Obviously, you know, there's --  
18 the word I got was that the meeting might have  
19 to be closed down if we couldn't resolve this,  
20 so it's not my intent to close the meeting  
21 down. The most important part of this meeting  
22 is hearing from the organic community on all

1 these important issues.

2 I do believe this issue remains  
3 unresolved, and I do believe very strongly  
4 that until we have very clear policies and  
5 procedures as required in our democratic  
6 society to run meetings of this sort, public  
7 meetings, that we do operate outside the law.  
8 So we'll leave that issue on the table and in  
9 the spirit of collaboration, I concur with  
10 your moving on with the meeting. Thank you so  
11 much for addressing these issues.

12 MR. McEVOY: Yes, thanks, Jay.  
13 And we are certainly operating within the law  
14 and under FACA and OFPA in this, in everything  
15 that we do. There's certainly questions that  
16 will come up in terms of procedure and how we  
17 operate, and we're happy to hear those  
18 questions, go back to counsel and report back  
19 to the Board about procedures.

20 So again, good morning. Thanks to  
21 everyone for coming. We're getting a little  
22 bit of a late start here, but there's a lot of

1 things to cover as well.

2 So I'd like to open the National  
3 Organic Standards Board meeting. As I said,  
4 I am Miles McEvoy. I'm the deputy  
5 administrator in the Agricultural Marketing  
6 Service, I'm the Program Manager of the  
7 National Organic Program, and I'm the  
8 Designated Federal Officer of the National  
9 Organic Standards Board.

10 Under the Federal Advisory  
11 Committee Act, and as per the NOSB policy and  
12 procedures manual, which says that the  
13 Designated Federal Officer can chair the  
14 meeting, it is my pleasure to open the San  
15 Antonio meeting.

16 Welcome to Board members and the  
17 public. I look forward to a great meeting.  
18 We've already had a lot of interesting things  
19 happening, and we'll continue to have that,  
20 I'm sure. In a moment, I will turn the  
21 meeting over to Mac Stone, the NOSB Chair, but  
22 first I have a few things that I'd like to

1 cover.

2 First of all, I want to thank the  
3 NOSB members for their service to the organic  
4 community. All the members of the Board are  
5 volunteers. They devote hundreds of hours on  
6 researching topics, discussing and developing  
7 proposals, reading and listening to the public  
8 comments, they all try to do this to provide  
9 the best recommendations possible to the  
10 National Organic Program, to the Agricultural  
11 Marketing Service, and to USDA.

12 Second, USDA, Agricultural  
13 Marketing Service, and then National Organic  
14 Program value very much the advice and  
15 recommendations of the NOSB. We are working  
16 to understand those recommendations, to review  
17 those recommendations and implement them as  
18 needed. There are many NOSB recommendations  
19 that have been passed over the years. There's  
20 dozens of them that we still have in the queue  
21 to be worked on.

22 Over the last year, many NOSB

1 recommendations have been acted upon by the  
2 NOP, including draft guidance on  
3 classification of materials, proposed rule on  
4 biodegradable mulch, certification  
5 requirements for unpackaged organic products,  
6 and many more.

7           We have significant -- we made  
8 significant progress on aquaculture, pet food  
9 and origin of livestock with proposed rules  
10 coming out later this year. And then many  
11 others are being worked on well, including  
12 animal welfare. The NOSB has passed dozens of  
13 recommendations and we're still trying to  
14 catch up with your great work.

15           Third, we value all of the public  
16 input and comments. We appreciate all the  
17 time that everyone puts in to the written and  
18 oral comments. We're here to listen and  
19 understand. That's part of the reason why  
20 we're sitting up here at the table. If you've  
21 been here over a number of years, when I first  
22 got here in 2009, the program sat down in the

1 front row and separate from the Board. And  
2 over the last few meetings, we've been sitting  
3 off to the side.

4 But what we've heard and you'll  
5 hear more in the NOSB assessment is that a lot  
6 of the comments that you all make are comments  
7 to the program as much as to the Board, and we  
8 want to be here, listen to your comments,  
9 understand where you're coming from to make  
10 sure that we can, in the best way possible,  
11 try to address your comments and move forward  
12 with the best interest of the organic  
13 community as a whole.

14 Fourth, we have heard a lot of  
15 comments and angst about the revised Sunset  
16 process and some changes to the NOSB  
17 procedures. Even Secretary Vilsack received  
18 a letter from Secretary Leahy and Congressman  
19 DeFazio last week. So we understand there's  
20 a lot of interest in the revised Sunset  
21 process.

22 We ask that you listen to our

1 presentations on the Organic Foods Production  
2 Act, on the Federal Advisory Committee and on  
3 the revised Sunset process. I think that you  
4 will find that the changes are better aligned  
5 with OFPA and FACA, ensure a better process  
6 and better public input and better protect the  
7 organic community from minority changes to the  
8 organic requirements.

9           And lastly, USDA is very  
10 supportive of the organic sector. We are busy  
11 in many areas to support the sector as you  
12 will hear throughout the day. Keep up the  
13 great work. We salute the work that you  
14 already do to support organics and protect the  
15 integrity of the organic label.

16           So let me briefly cover the agenda  
17 for the next few days. We have a lot of  
18 topics to cover over the next few days. Today  
19 we start with an overview of NOSB procedures,  
20 covering the NOSB assessment, the Organic  
21 Foods Production Act, FACA, the Federal  
22 Advisory Committee Act, and the NOSB policies

1 and procedures manual.

2                   Next, Dr. Jean Richardson will  
3 provide an update on the policy development  
4 subcommittee. Next we'll cover the National  
5 List and petition process, a brief overview of  
6 rule making, how NOSB recommendations become  
7 law, followed by the revised Sunset process.  
8 Next will be a report from the National  
9 Organic Program, of the activities that we're  
10 up to. Then we'll have lunch.

11                   The afternoon will start with a  
12 presentation from USDA's Natural Resource  
13 Conservation Service on opportunities for  
14 organic farmers, and some issues regarding  
15 conservation practices on organic farms. This  
16 presentation will help explain the memo that  
17 we sent to the Board yesterday requesting that  
18 they work on soil conservation practices for  
19 organic farms.

20                   Next we'll have a report from the  
21 Secretary's office on all the activities at  
22 USDA that support organic agriculture.

1                   Then we get to the most important  
2                   and interesting part of the meeting, the  
3                   public comments. Public comment runs to the  
4                   end of today and through a majority of  
5                   Wednesday. Thirty percent of the meeting time  
6                   is devoted to public comments.

7                   Wednesday afternoon we'll have the  
8                   crop subcommittee items that will be  
9                   discussed. Thursday the Board will cover  
10                  livestock handling certification,  
11                  accreditation and compliance and materials  
12                  items. Friday morning will be for deferred  
13                  items, NOSB officer elections, and then we'll  
14                  wrap up by noon.

15                  So, okay, now I'm going to  
16                  introduce the USDA team that's here. First of  
17                  all, I have Dr. Melissa Bailey on my right,  
18                  the NOP standards director. Next to her is  
19                  Dr. Lisa Brines, the National List Manager.

20                  We have Michelle Arsenault, our  
21                  NOSB advisory board specialist that will  
22                  handle all of the oral public comments. So if

1 you have any questions about logistics or  
2 timing, please connect with her. She also --  
3 if you have anything for handing out to the  
4 Board or for your presentations, get that  
5 information to Michelle.

6 We also have Mark Lipson, Organic  
7 Policy Director from the Secretary's office.  
8 He'll be speaking this afternoon. We have Sam  
9 Jones from AMS Public Affairs, so if there's  
10 any media here, please check in with Sam. And  
11 then we have Sara Brown from the Natural  
12 Resource Conservation Service who will be  
13 speaking about soil conservation this  
14 afternoon.

15 Okay. Mac, now I'll turn it over  
16 to you.

17 CHAIR STONE: Thank you, Miles.

18 It's been a year since we were  
19 together. That's given a lot of us time to  
20 think, it gave the USDA time to do some  
21 recalibration and looking at how we operate.  
22 The Board had a training in February and we

1 were apprised of a lot of these changes, and  
2 so the Board has spent a lot of time in  
3 discussion of, we still have a lot of  
4 responsibility to take -- all these 15 of us  
5 have a lot of responsibility to assimilate and  
6 make decisions on your all's behalf.

7           And I assure you there are no easy  
8 decisions on this side of the microphone, and  
9 we need and thrive off of all of your all's  
10 input. But ultimately we have the  
11 responsibility to take the longer view or to  
12 respect our perspective of where to guide this  
13 ship.

14           So I look forward in the next few  
15 days as we sort of land in a new spot, if you  
16 will, and agree to go forward because it's  
17 quite frustrating when we keep punching each  
18 other in the nose rather than agreeing on our  
19 differences and then ultimately leaving it up  
20 to us to decide. And I say, there's no easy  
21 decisions. There's always people that benefit  
22 and people that come up short on a decision.

1                   So I urge us to have a very  
2                   serious conversation and respect each other's  
3                   differences. But ultimately these 15  
4                   people -- these 14 people that I've grown to  
5                   respect very much are going to have to make  
6                   some decisions in the next few days, and we  
7                   just need to listen and we need to agree at  
8                   some point how we're going to go forward. The  
9                   Board still has a lot of responsibility here.  
10                  The Board's responsibility was not take away.  
11                  The procedure was changed in the way we  
12                  operate.

13                         So we didn't get -- I didn't get a  
14                         chance to welcome to all to Louisville last  
15                         October. We have rescheduled that meeting in  
16                         Louisville, so I look forward to hosting all  
17                         of you all in the great state of Kentucky.

18                         And I would remind you, if  
19                         everyone would turn your cell phones on  
20                         vibrate, please. Also, there will be a  
21                         reception tomorrow night. Right, Michelle?  
22                         Tomorrow night's the reception? NCAT, Robert

1     Maggiani and several other members; TOFGA,  
2     Texas Organic Farming and Gardening  
3     Association, Whole Foods, Crave Market, Zurich  
4     International Properties, Eugene Martinez  
5     Farm, and -- I should have read this before --  
6     Valhausen Family Farm. Mr. or Mrs. Valhausen,  
7     excuse me for pronouncing your name however I  
8     should have.

9                     So that is around the corner.  
10    There are maps I guess out on the little  
11    table. It's just two or three blocks away,  
12    and we very much appreciate them letting us  
13    all get together in a casual setting tomorrow  
14    evening.

15                    As is tradition, at some -- we  
16    always remind ourselves of the vision, of our  
17    mission, if you will, is to assist in the  
18    development of standards for substances to be  
19    used in organic production and to advise the  
20    Secretary on any other aspects of the  
21    implementation of this title.

22                    And I chose that mission statement

1 versus the vision. We still have the  
2 responsibility, we still have a mechanism to  
3 advise the Secretary. Again, the process may  
4 have changed, but the responsibility and the  
5 ability to effect change has not changed.

6 With that I failed to introduce  
7 myself. And then I'll ask the Board members  
8 to follow suit. Again, I'm Mac Stone,  
9 currently the chair of the National Organic  
10 Standards Board. My wife and her brother and  
11 their family and I run a certified organic  
12 farm in Kentucky. We have CSA, farmers  
13 market, mostly a direct market operation. I'm  
14 dramatically impacted by the work of this  
15 Board over the past few years, and represent  
16 the certifiers on the Board.

17 And with that I'll hand it off to  
18 Mr. Foster. We'll go this way.

19 VICE CHAIR FOSTER: My name's John  
20 Foster. I've been -- this is my last of five  
21 years on the Board. I represent  
22 handler/processor folks. I, in the past, have

1 served as crops -- going back then -- crops  
2 committee chair and have also served as the  
3 chair of the handling subcommittee after the  
4 name change. It's, again, a pleasure to be  
5 here, and I -- my other job is for Earthbound  
6 Farm. I work in the areas of regulatory  
7 compliance.

8                   SECRETARY WALKER: Good morning.  
9 My name is Calvin Walker. However, the last  
10 two years I've changed it to C. Rueben Walker  
11 because I found out that it helped with  
12 funding for my university. When you get 3-  
13 and \$400,000 in grants when you use C. Rueben  
14 Walker, you might as well continue to use C.  
15 Rueben.

16                   Again, I would like to welcome  
17 everybody to Texas, the neighboring state of  
18 Louisiana. And before I say a little bit more  
19 about myself, I would like to say  
20 congratulations and happy birthday Dr. Jean  
21 Richardson. Today she's 25 years old.

22                   (Applause.)

1                   SECRETARY WALKER: I was appointed  
2 to the Board by Secretary Vilsack as a  
3 consumer, a public interest advocate. My way  
4 to organics came about by Mr. Frank Stronach,  
5 former founder of Magna Corporation in Canada,  
6 and Dennis Mills, his CEO. And their efforts  
7 was to help grow organics among minorities  
8 during the time of Katrina.

9                   And I was one of the individuals  
10 that they had called to help. I didn't know  
11 a lot -- I used the word shiggity. Shiggity  
12 is a word I could tell you what it means later  
13 on. I think it's good for the transcript to  
14 use the word shiggity. But Mr. Stronach and  
15 Dennis Mills was able to give me some good  
16 guidance about organics. And this is the way  
17 that I came to organics, and I'm glad that  
18 these two individuals were a part of my  
19 evolution to organics.

20                   I currently serve as chair of the  
21 Agricultural Sciences and Urban Forestry  
22 Program at Southern. And I represent, again,

1 the consumers, the public, and I served as the  
2 vice -- as the chair of the materials  
3 committee, and I'm member of the livestock  
4 committee.

5 MEMBER RICHARDSON: Thank you,  
6 Calvin.

7 I'm not as funny as Calvin is.  
8 But I have -- you know, anyway. So I'm Jean  
9 Richardson. I have a background in the  
10 biological and earth sciences and law,  
11 professor emerita of environmental studies and  
12 natural resources, University of Vermont.

13 I used to operate a small family  
14 farm. Mostly we had animals like a sort of  
15 McDonald's farm, is you will, grew little of  
16 everything. Now I help my kids on their  
17 organic maple syrup production business in  
18 northern Vermont. And we had a very late  
19 season this year because of the weather.

20 And also an organic inspector,  
21 have been for about 14-15 years, for both  
22 farms and for processing and for handling, and

1 I represent public interest on the Board. I'm  
2 also on the handling subcommittee, the  
3 livestock subcommittee and the accreditation  
4 subcommittee, and for a brief period I was a  
5 chair of policy, and maybe I still am, that  
6 yet remains to be seen. Thank you.

7 MEMBER DICKSON: Thank you, Jean.

8 My name is Joe Dickson. I am the  
9 global quality standards coordinator at Whole  
10 Foods Market just up the road in Austin,  
11 Texas. I am in my fifth year on the National  
12 Organic Standards Board as the retail  
13 representative on the Board.

14 I serve on the compliance,  
15 accreditation and certification committee,  
16 along with the livestock and the handling  
17 committees, and I'm happy to be here in San  
18 Antonio and welcome you all to Texas.

19 MEMBER BECK: Good morning. My  
20 name is Carmela Beck. I work for Driscoll  
21 Strawberry Associates. We're based out of  
22 Watsonville, California. I'm the organic

1 program manager, so I do the certification for  
2 all of our organic farmers. I have the farmer  
3 seat. I'm in my third year. I am the chair  
4 of the CACS and I also am on the crop  
5 subcommittee. And it's nice to see all of you  
6 here.

7 MEMBER FAVRE: As we say in Texas,  
8 howdy. As a native Texan, I'd like to welcome  
9 you to the great republic of the state of  
10 Texas, home of the Alamo, which I encourage  
11 you to go see. Every school child in Texas in  
12 the eighth grade takes Texas history, and the  
13 Alamo is one of the great stories of the state  
14 of Texas, so I encourage you to go.

15 My name is Tracy Favre. I'm  
16 currently head of the livestock subcommittee.  
17 I am a registered professional engineer in the  
18 state of Texas. I sit on the environmental --  
19 one of the environmental seats on the Board  
20 after having worked as an environmental  
21 engineer in the state of Texas for 18 years.  
22 I currently have a small diversified family

1 farm in Granbury, Texas, just southwest of Ft.  
2 Worth. Thank you all for coming here today.

3 MEMBER MARAVELL: Hi, I'm Nick  
4 Maravell, organic producer of crops and  
5 livestock in Maryland.

6 MEMBER FULWIDER: Hi, I'm Wendy  
7 Fulwider, and I represent producers on this  
8 Board. I own a certified organic dairy farm  
9 with my son, Cody, in Ripon, Wisconsin, and we  
10 also direct market grass-finished beef,  
11 pastured pork and free range poultry. I also  
12 work for Global Animal Partnership as a farm  
13 animal care specialist.

14 MEMBER THICKE: Hi, I'm Francis  
15 Thicke. I'm from Iowa, an organic dairy  
16 farmer, and we market our products locally,  
17 process it on the farm. I'm also a soil  
18 scientist and in the past have worked at USDA  
19 in Washington as a natural program leader for  
20 soil science with the USDA extension service.  
21 And I sit in the environmentalist chair.

22 MEMBER BONDERA: Hello everybody.

1 My name is Colehour Bondera and I'm glad to be  
2 in Texas, but I'm here from Hawaii, and I'm a  
3 representative on the board of organic  
4 farmers, which my family has a small diverse  
5 organic farm in Hawaii. I think the only  
6 thing worth sharing is that I serve -- I'm  
7 former chair of the policy development  
8 subcommittee, as Jean referred, and I serve on  
9 the crops and the livestock subcommittees.  
10 Thank you.

11 MEMBER TAYLOR: Good morning. I'm  
12 Jennifer Taylor and on the Board I serve and  
13 represent the public and the organic  
14 community. Thank you.

15 MEMBER FELDMAN: Good morning.  
16 Good morning. Jay Feldman. I am Executive  
17 Director of Beyond Pesticides. I serve in the  
18 environmental conservation slot on the Board.

19 Our organization is a diverse mix  
20 of scientists and activists and farmers, farm  
21 workers who come together around the idea that  
22 toxic chemicals have no place in our society,

1 especially in the production of food. We  
2 believe very deeply that we need to grow the  
3 organic community, grow the organic commitment  
4 on behalf of consumers and all those out there  
5 that are concerned about health and  
6 environment.

7                   And we do that by building trust,  
8 trust in the organic label. So you'll hear me  
9 speaking throughout this meeting from that  
10 perspective because we believe organic is the  
11 solution to pesticide pollution. And it is an  
12 honor to serve with all of these incredibly  
13 dedicated people on this Board and in the  
14 agency. And I hope we can make the right  
15 decisions over the next couple of days. Thank  
16 you.

17                   MEMBER SONNABEND: Hi, I'm Zea  
18 Sonnabend from Watsonville, California. My  
19 affiliations are Fruitilicious Farm and CCOF.  
20 I chair the crops committee and serve on the  
21 handling committee and the materials/GMO  
22 committee, and the inerts working group.

1                   MEMBER AUSTIN: Good morning. My  
2 name's Harold Austin. I'm with Zirkle Fruit  
3 Company. We're a handler and a processor out  
4 of the state of Washington farming organic  
5 apples, cherries, pears, wine grapes,  
6 blueberries.

7                   I sit as the chair of the handling  
8 subcommittee, I serve on the crops committee  
9 and also the CACS. I've been a part of the  
10 organic industry for a little over 20 years,  
11 first as a consultant and then as part of the  
12 part of the company that I now work for. I'm  
13 very proud of that affiliation and that  
14 association.

15                   We've come a long ways, our  
16 organic family. And that's everybody in this  
17 room. And I'm proud to be a part of the  
18 growth of what organics is today compared to  
19 where we were even just a mere five, six,  
20 seven years ago. We've got a long ways to go.  
21 We've got a long ways to work together to  
22 overcome the hurdles and challenges that our

1 organic industry and our organic family and  
2 community will face.

3 And we need to do that together  
4 collectively. There's a way that we can step  
5 into the same room and work with same  
6 commitment, no matter what your perspective,  
7 no matter what your passion, no matter what  
8 entities you represent, as we can show by the  
9 15 of us that sit on this Board working  
10 together for a common goal.

11 I'm glad to be a part of it, and I  
12 thank you all for being here. And I would  
13 like to say that Washington State's also -- we  
14 don't have a basketball team anymore, but we  
15 are the home of the Seattle Seahawks, the  
16 world championship football team.

17 CHAIR STONE: And that ball  
18 doesn't really bounce very well, does it?

19 MEMBER AUSTIN: A little bit  
20 pointy.

21 CHAIR STONE: Well, thank you all.  
22 And, Zea, I think I'll recommend to the

1 executive committee that we make that the non-  
2 GMO committee. Okay?

3 All right. Thank you. Yes, we  
4 are here -- as I said, this group of  
5 individuals up here is going to have to make  
6 some decisions, and the better that we can  
7 engage with you all and have a spirited  
8 debate, if you will, is very important. Miles  
9 referenced that a full third of the time that  
10 we have together is in oral comments.

11 I'll assure you that written  
12 comments, all of us around the table that look  
13 a little bleary-eyed, it's not from jet lag,  
14 it's from reading every single one of those  
15 written comments so that when we get together  
16 we can address the specific issues.

17 And when we get substantive  
18 written comments, it affects the way we do  
19 business on this side of the table. We're  
20 looking at how do we have a more efficient  
21 method of us getting your all's input into the  
22 process.

1                   So those are the types of things  
2                   that are still very much alive and very much  
3                   of what we're trying to do on your all's  
4                   behalf, as Harold said, to grow this community  
5                   and grow that seal that you see displayed up  
6                   on the board behind me.

7                   So with that, Miles is going to  
8                   give us some assessment that the program has  
9                   been working through with their staff at USDA.

10                   MR. McEVOY: Okay. Thanks, Mac.

11                   So what -- the next part of the  
12                   day is going to be the presentations that we  
13                   actually gave to the National Organic  
14                   Standards Board in February in an abbreviated  
15                   fashion. So all of the content that's going  
16                   to be covered today is already up on our  
17                   website. You just go under the NOSB February  
18                   training and you can find the content for a  
19                   lot of things that we cover today.

20                   This is a shorter version of that,  
21                   but we're going to go through that information  
22                   again. Part of the information that we got

1 from the assessment is that it's very  
2 important that we're very clear on what the  
3 procedures are, how we operate, and in many  
4 different levels of USDA and AMS, NOP and  
5 NOSB.

6           Okay. Great. So I'm going to --  
7 first, I'm going to cover the NOSB assessment,  
8 then I'm going to cover NOSB under the Organic  
9 Foods Production Act and the Federal Advisory  
10 Committee Act, because both of those Acts,  
11 those statutes are very important to the  
12 understanding of how the National Organic  
13 Standards Board works, and then get into NOSB  
14 procedures.

15           So first of all, we all know about  
16 the concept of continual improvement under the  
17 organic principles. We're always looking of  
18 ways to improve the process, to make the  
19 system better. This is a public/private  
20 partnership the way that the Organic Foods  
21 Production Act was set up, a partnership  
22 between public entities and private groups.

1                   We've received requests from the  
2 public for more transparency and clarification  
3 of the NOSB process. Many of the people in  
4 this room have submitted those kinds of  
5 comments over the last few years.

6                   So AMS has these goals of, first  
7 of all, to fully address all the NOSB  
8 recommendations. There's many  
9 recommendations, as I said, that we still have  
10 not fully addressed, and to receive advice  
11 from the NOSB that we can implement.

12                   We really want to be successful.  
13 We want those recommendations to be things  
14 that we can actually work with and implement  
15 through the governmental process. We're also  
16 interested in improving the efficiency and  
17 effectiveness of the NOSB to make sure that  
18 the recommendations are as effective as  
19 possible and really can be implemented.

20                   So last summer we contracted with  
21 the Meridian Institute to conduct an outside  
22 assessment of the NOSB to try to learn things

1 of how we could improve that process. The  
2 Meridian Institute is a non-profit with  
3 expertise in process design, facilitation,  
4 mediation and conducting assessments of  
5 organizational dynamics. The Meridian  
6 assessment report was posted yesterday, so you  
7 can see the full report on the NOP website  
8 now.

9 The methodology that they followed  
10 is they conducted 33 interviews between  
11 October and early December. All the Board  
12 members were interviewed and then some key  
13 stakeholders. They analyzed that data from  
14 the interviews to develop their report.

15 Now 33 is not that many, it's not  
16 a statistically valid sample of the organic  
17 community, but that was the resources that we  
18 had. We tried to identify our key  
19 stakeholders within the organic community that  
20 are very active in the National Organic  
21 Standards Board process to be the key folks  
22 that we interviewed as part of that process.

1                   The key findings in this report of  
2                   what we heard works from the report is that it  
3                   was good access to the National Organic  
4                   Program staff when needed by the National  
5                   Organic Standards Board, strong leadership  
6                   from NOP staff, improvements in the  
7                   organization and implementation of the process  
8                   in recent years.

9                   If you've been following the  
10                  National Organic Standards Board, there have  
11                  been many changes that we've implemented over  
12                  the years. We'll continue to do that to try  
13                  to make the process better. Good  
14                  documentation of public meetings and the  
15                  subcommittee calls.

16                  Also, a high level of respect  
17                  among the Board members, public meetings are  
18                  very effective at moving through established  
19                  agendas. There's a clear NOSB focus today  
20                  than in previous years is what they said were  
21                  their findings. And that stakeholders  
22                  generally view the NOSB process as transparent

1 and particularly the public meetings. A lot  
2 of value that the stakeholders felt were in  
3 these public meetings.

4 The major themes that they  
5 identified in the report were in four areas:  
6 roles and responsibilities, communication and  
7 transparency, NOSB workload and scope, and  
8 NOSB public meetings. So I'll go into each of  
9 those in more detail.

10 So in terms of roles and  
11 responsibilities they identified a range of  
12 views on the following issues. First of all,  
13 NOSB authority. We've already seen that this  
14 morning. There's a lot of different  
15 viewpoints in terms of what is the NOSB's  
16 authority.

17 The development of NOSB work  
18 plans, which I'll cover in more detail later  
19 today, there was a lot of differing views on  
20 that. And the nature of the partnership  
21 between the NOSB and the National Organic  
22 Program in developing recommendations and

1 setting policy. So a lot of divergent  
2 viewpoints in these particular areas.

3 So their concepts for potential  
4 next steps, first of all, the need to clarify  
5 the extent of the advisory nature of the  
6 Board, the responsibility for both the  
7 National Organic Program and the National  
8 Organic Standards Board in developing and  
9 executing work plans, NOP's legal  
10 responsibilities regarding review of the NOSB  
11 recommendations, and the protocols to guide  
12 collaborative work with the NOSB.

13 So they also suggested providing  
14 training to new NOSB members, clarifying the  
15 roles and responsibilities. So that's one of  
16 the concepts that we hope to implement, or we  
17 plan to implement is ensuring adequate  
18 training for new NOSB members that come on to  
19 the Board.

20 In terms of communication and  
21 transparency, their key findings were that  
22 there were differing perceptions of how

1 effective communication currently is between  
2 NOP staff and the NOSB, particularly regarding  
3 the development of subcommittee work plans.  
4 There was a desire for more communication  
5 pathways to the National Organic Program from  
6 external stakeholders.

7 This is one way to get information  
8 into the National Organic Program, but there  
9 are other methods that we want to highlight as  
10 well. There is the NOP guidance at usda.gov  
11 that's always open for public comment, so we  
12 want to make people aware that there are ways  
13 to get comments into the National Organic  
14 Program at any time.

15 And stakeholders also seek a clear  
16 understanding of progress that's made on these  
17 NOSB recommendations within the USDA's rule  
18 making process. So we'll try to be more  
19 transparent and more communicative about where  
20 we are with the various NOSB recommendations.

21 So our next steps, review the  
22 roles and responsibilities for the National

1 Organic Standards Board and the National  
2 Organic Program; to guide input on  
3 subcommittee work plans, we'll go through that  
4 in more detail later this morning; establish  
5 a means for external stakeholders to provide  
6 comment directly to the National Organic  
7 Program rather than through NOSB channels. We  
8 have some things set up but we need to expand  
9 on those.

10 The Board passed an open  
11 communication recommendation last year or the  
12 year before that we still haven't implemented.  
13 It's one of a number of NOSB recommendations  
14 that haven't been implemented that we support.  
15 We just haven't gotten that particular item  
16 completed.

17 And providing more clarity on the  
18 process that recommendations must go through  
19 to be implemented by USDA. And that's what  
20 we're going to try to do today, is to provide  
21 some more clarity, some more information about  
22 that process that we go through to make those

1 recommendations into effective rules or  
2 policy.

3 The next area was around NOSB's  
4 scope. The key issues identified was that  
5 there was an extensive NOSB workload, it was  
6 hard for many of the NOSB members to manage  
7 the work that they have in front of them in  
8 terms of the national risk, the Sunset and the  
9 other work that the Board is working on.

10 Desire for more strategic  
11 conversations. On the one hand there's too  
12 much work for the Board, on the other hand the  
13 Board wants to have more higher level  
14 strategic conversations about the direction of  
15 the organic standards, organic community.

16 The complex technical nature of  
17 petitions reviewed by the Board. That's very  
18 much a challenging thing for the Board  
19 members. These are very complex technical  
20 issues on many of these materials. And then  
21 uneven distribution of work among  
22 subcommittees.

1                   So potential next steps here, one  
2                   idea is to focus strictly on National List  
3                   issues. That's the area of authority  
4                   specifically granted under the Organic Foods  
5                   Production Act. Clarify the process of  
6                   identifying and vetting experts to participate  
7                   in technical advisory panels, and focus  
8                   additional efforts on technical support for  
9                   NOSB subcommittees.

10                   One of the things that we've done  
11                   over the last few years, each of the  
12                   subcommittees now has a technical  
13                   representative from the National Organic  
14                   Standards Board to try to provide support to  
15                   those subcommittees. But still the Board  
16                   wants more information and more support, so  
17                   how can we provide more support, technical  
18                   support for those subcommittees.

19                   In terms of effective public  
20                   meetings, the meeting duration was seen as  
21                   limiting the robust discussion, so certainly  
22                   a suggestion for longer public meetings. The

1 oral public comment was viewed as having a  
2 disproportionate impact on the NOSB meetings.

3 The high volume of written public  
4 comments is difficult for the Board to review.  
5 Part of the problem is, is that the written  
6 comment period closes pretty close to the  
7 meeting date, so it's a very, very compressed  
8 amount of time for the Board to review all  
9 those comments between the closure of written  
10 comment period and the opening of the meeting.

11 A need for more collegial meeting  
12 environment and desire for more robust  
13 dialogue among Board members during meetings.

14 So potential next steps here,  
15 consider length of public meetings as well as  
16 conducting some portions of the public  
17 meetings via teleconference, webinar or other  
18 virtual means. So we might want to look into  
19 some of those concepts of using technology to  
20 expand the open public meetings that the Board  
21 has.

22 Establish a mechanism to gather

1 and consider written comments directed to the  
2 NOP rather than the NOSB. So is there some  
3 way that we can carve off part of the meeting  
4 for comments directly to the National Organic  
5 Program. Consider restructuring the public  
6 comment process to better facilitate direct  
7 dialogue and feedback. Consider whether focus  
8 should be on oral or written comments and  
9 adjust schedules accordingly.

10           There's some interesting ideas  
11 that they have in the assessment report about  
12 ways of improving the dialogue or other ways  
13 of running this meeting to have more dialogue  
14 and discussion at these meetings.

15           Other things that the assessment  
16 report discusses is subcommittee process and  
17 functions, NOSB policies and procedures and  
18 Board member selections. So please take a  
19 look at the assessment report. There's a lot  
20 of really good information in there that can  
21 give us some ideas of how to continue to  
22 improve the process.

1                   So now moving on to the National  
2                   Organic Standards Board. As you know, the  
3                   Board is appointed by the Secretary of  
4                   Agriculture under the Federal Advisory  
5                   Committee Act. The purpose of a FACA  
6                   committee is to obtain advice or  
7                   recommendations on issues or policies within  
8                   the scope of an agency's official  
9                   responsibilities. NOSB reviews substances and  
10                  recommends if they should be allowed and  
11                  prohibited.

12                  USDA's role with the National  
13                  Organic Standards Board, we have specific  
14                  responsibilities, including ensuring that  
15                  there's public access to the NOSB actions and  
16                  that that is maximized. We're responsible for  
17                  issuing administrative guidelines to the  
18                  National Organic Standards Board. We're  
19                  responsible for controlling the undue  
20                  influence of special interests by balancing  
21                  committee membership. This is all from the  
22                  Federal Advisory Committee Act. We're also

1 responsible to monitor and reduce costs as  
2 much as possible to make -- to maximize the  
3 return on the investment of public money into  
4 these meetings.

5 In addition, USDA may not include  
6 exemptions for the use of specific synthetic  
7 substances without them having been proposed  
8 or recommended by the National Organic  
9 Standards Board. We all know this point, but  
10 it's important to reiterate that the USDA, the  
11 National Organic Program cannot add anything,  
12 any synthetic substance to the National List  
13 unless there's a recommendation for that to  
14 happen that comes from the National Organic  
15 Standards Board.

16 In addition though, also within  
17 OFPA, USDA is responsible for evaluating the  
18 OFPA criteria associated with National List  
19 substances. So there's a shared  
20 responsibility.

21 We certainly can't add anything to  
22 the National List that hasn't been recommended

1 by the Board. But just because it's  
2 recommended by the Board, we still have to do  
3 the analysis to determine that it meets OFPA  
4 criteria and may or may not decide to add  
5 something to the National List.

6 So our specific role with the  
7 National List, we establish and administer a  
8 national list of approved and prohibited  
9 substances. That's the -- AMS'  
10 responsibility. Those are based on the  
11 recommendations from the National Organic  
12 Standards Board.

13 The Secretary may not include  
14 exemptions for the use of specific synthetic  
15 substances without a recommendation from the  
16 Board, and we must publish any proposed  
17 amendments to the list and seek public  
18 comment, and must note any changes the  
19 Secretary has made to the Board's  
20 recommendation in any proposed and final rule  
21 making that we do.

22 After evaluation of the comments,

1 the Secretary shall publish the final National  
2 List, along with an analysis of the comments  
3 that we received on the proposed National  
4 List.

5 In terms of the Sunset provision,  
6 receive the Board's five-year review on the  
7 National List substances and determine whether  
8 or not to renew those substances. That's the  
9 USDA's responsibility.

10 So we'll quickly cover the Sunset  
11 provision, but we're going to go into a lot  
12 more detail on the Sunset provision later this  
13 morning. From the statute, no exemption or  
14 prohibition contained on the National List  
15 shall be valid unless the NOSB has reviewed  
16 such exemption or prohibition as provided in  
17 this section within five years of such  
18 exemption or prohibition being adopted or  
19 reviewed, and the Secretary has renewed such  
20 exemption or prohibition. So the process is  
21 the NOSB reviews, and the Secretary renews  
22 these substances on the National List.

1                   So from our perspective the Sunset  
2 process needed to be revised. There was a lot  
3 of drawbacks to the previous process. It only  
4 required two-fifths of the Board to remove a  
5 substance from the National List.

6                   Every Sunset required three NOP  
7 rule making steps. Substances used to be  
8 discussed in one public meeting and there were  
9 many annotation changes that were  
10 problematical for us to implement during the  
11 rule making process.

12                   So the revision we feel has many  
13 benefits. It's a thorough and transparent  
14 review process for all substances, it provides  
15 two public comment opportunities before the  
16 NOSB completes its review of each substance,  
17 it ensures that any change to the National  
18 List, whether it's petitioned or through the  
19 Sunset process, is supported by two-third  
20 majority, a decisive majority of the National  
21 Organic Standards Board.

22                   And it streamlines the

1 administration of the National List by  
2 simplifying our rule making process. So we  
3 see there are many benefits to this revised  
4 process. And as I said, we'll get into this  
5 in more detail later this morning.

6 So a little bit of legislative  
7 history of the creation of the -- and the  
8 membership of the National Organic Standards  
9 Board. The 1990 Farm Bill Senate Committee  
10 and Conference Report, Board membership was  
11 carefully selected to provide a balance of  
12 interests.

13 There was concern about  
14 appropriate representation given the Board's  
15 anticipated influence in setting standards.  
16 At the time it was noted that the interest of  
17 farmers and handlers and the interest of  
18 consumers and environmentalists required  
19 balance, and that's why the representation  
20 included six of each of these two interest  
21 groups. It was then supplemented by a  
22 retailer, and then later by a certifier and a

1 scientist to have the 15 members of the Board.

2 The two-third majority vote to  
3 carry any motion was set to adequately prevent  
4 any one interest from controlling the Board.  
5 So the idea is to have a majority, more of a  
6 consensus viewpoint when there's a  
7 recommendation that comes out of the National  
8 Organic Standards Board.

9 So under the Organic Foods  
10 Production Act, it states that the Secretary  
11 shall establish a National Organic Standards  
12 Board in accordance with the Federal Advisory  
13 Committee Act to assist in the development of  
14 standards for substances to be used in organic  
15 production and to advise the Secretary on any  
16 other aspects of implementation of this title.  
17 So those are the specific things that come  
18 from the statute about the National Organic  
19 Standards Board.

20 There are many responsibilities  
21 that the NOSB has. First of all, provide  
22 recommendations to the Secretary regarding

1 implementation of the Organic Foods Production  
2 Act, develop the proposed National List or  
3 proposed amendments to the National List for  
4 submission to the Secretary, convene technical  
5 advisory panels to provide scientific  
6 evaluation of materials, review botanical  
7 pesticides, advise the Secretary on product  
8 residue testing, and emergency spray programs.

9           And there are some specific  
10 requirements while establishing the proposed  
11 amendments and those include reviewing  
12 available information on potential adverse  
13 human and environmental affects, obtain a  
14 complete list of ingredients of considered  
15 substances from manufacturers to determine if  
16 it includes synthetic inert materials, and to  
17 submit to the Secretary results of the Board's  
18 evaluation and any technical advisory panel.

19           And then to use seven specified  
20 evaluation criteria which are in very small  
21 print here, but there are seven specific  
22 criteria that the Board continually uses to

1 evaluate substances through the Sunset process  
2 and through the petition process.

3           And this is abbreviated, but those  
4 seven areas are to look at detrimental  
5 chemical interactions. The second one is  
6 toxicity and mode of action, the break down  
7 products, the persistence in the environment.  
8 The third one is probability of environmental  
9 contamination during manufacturing and use.  
10 The fourth is effect of the substance on human  
11 health.

12           The fifth is the affects of the  
13 substance on biological and chemical  
14 interactions in the agroecosystem. The sixth  
15 is alternatives to using the substance. And  
16 the seventh is compatibility with a system of  
17 sustainable agriculture. So those are the  
18 criteria that the Board utilizes to determine  
19 whether or not a substance meets the  
20 requirements under OFPA.

21           The Board is also responsible for  
22 establishing procedures for receding petitions

1 to evaluating substances for inclusion on the  
2 list, and to conduct Sunset review of each  
3 substance on the list within five years of  
4 that substance being adopted or renewed.

5 Okay. Now with that every quick  
6 overview of some of the provisions in OFPA,  
7 we're going to move on to the Federal Advisory  
8 Committee Act. And under the Federal Advisory  
9 Committee Act the Secretary has certain  
10 responsibilities to establish the National  
11 Organic Standards Board in accordance with  
12 that Federal Advisory Committee Act.

13 And FACA committees are  
14 established for the purpose of obtaining  
15 advice or recommendations on issues or  
16 policies within the scope of an agency's  
17 official responsibilities. Like the NOSB,  
18 many FACA boards are statutory. In 2012 141  
19 of the 169 USDA boards were statutory.

20 So the USDA has many FACA boards,  
21 many advisory committees that provide advice  
22 and recommendations to the Secretary.

1 169 as of 2012, and many of those are  
2 statutorily defined by Congress.

3 So the NOSB is unique and special  
4 and it's also the same as many other advisory  
5 committees. It operates under the Federal  
6 Advisory Committee Act and therefore the  
7 Federal Advisory Committee Act is really,  
8 really important to have a basic understanding  
9 of some of the provisions in FACA that affect  
10 the operations of the NOSB.

11 And federal advisory committees  
12 exist to advise and recommend, not to decide.  
13 Obviously the recommendations are very  
14 important to USDA, and we try as much as we  
15 can to address them and to implement them, but  
16 they are recommendations. They're advice to  
17 the Secretary. It's the USDA's responsibility  
18 to have the rules and the policies and the  
19 guidance for enforcing and protecting organic  
20 integrity.

21 Some of the requirements that FACA  
22 committees must have, there has to be a

1 charter. It has to be established with  
2 mission and duties and the charter has to be  
3 renewed every two years. We have a charter  
4 that's just about ready to expire. The new  
5 charter will be posted very shortly, within  
6 the next few weeks I believe.

7 And the charter is a very  
8 important thing. It's on our website, people  
9 should take a look at it. It has some basic  
10 provisions about the operating procedures for  
11 the National Organic Standards Board.

12 FACA committees also have to have  
13 fair and balanced membership. The Secretary  
14 appoints the members based on the Organic  
15 Foods Production Act's categories. A  
16 Designated Federal Officer for advisory  
17 committee and its subcommittees has to be  
18 designated.

19 FACA assigns a number of  
20 activities to the Designated Federal Officer.  
21 And there also has to be an opportunity for  
22 reasonable participation by the public in

1 advisory committee activities, subject to  
2 agency guidelines around FACA committees.

3 Open meetings is part of the FACA  
4 rules, so open meetings with opportunity for  
5 public comment. Any member of the public is  
6 permitted to file a written statement with the  
7 advisory committee, and any member of the  
8 public may speak to or address the advisory  
9 committee within the appropriate guidelines.  
10 So everything that the Board does has to be  
11 done in -- under the Open Public Meetings Act  
12 and in the public.

13 So what's the difference between  
14 subcommittees versus committees? That's why  
15 we changed the name a few years ago. We used  
16 to call the subcommittees committees, but  
17 committees are things that are subject to the  
18 FACA rules. That's why we're now calling them  
19 the handling subcommittee, the crops  
20 subcommittee, and so on.

21 Subcommittee meetings must be  
22 conducted in accordance with FACA's openness

1 requirements if recommendations are made  
2 directly to the federal agency. And the way  
3 that the things are set up under this Board is  
4 subcommittees do not make recommendations  
5 directly to USDA or AMS. They provide a  
6 process for the Board as a whole to have some  
7 work being done and proposals brought forward  
8 to the full Board for discussion and decision.

9           So there's no decision making that  
10 occurs at the subcommittee level. They're  
11 just bringing things forward, organizing the  
12 work so the full Board that meets here today  
13 and other meetings, this is where the final  
14 advice and recommendation is determined.

15           So the parent advisory committee  
16 would -- subcommittee would have to meet FACA  
17 openness requirements if the parent advisory  
18 committee would adopt the subcommittee  
19 recommendations without any further  
20 deliberations. The further deliberations  
21 happen here.

22           NOSB subcommittee proposals do not

1       come directly to USDA, they come through the  
2       NOSB full committee, and this is why the  
3       subcommittee calls are not currently opened to  
4       the public, and this is also why we call  
5       subcommittee products proposals rather than  
6       recommendations.

7                       So our responsibilities,  
8       Agricultural Marketing Service's  
9       responsibilities is, first of all, we need to  
10      comply with FACA, with Federal Advisory  
11      Committee Act. We need to issue  
12      administrative guidelines and management  
13      controls that apply to advisory committees.  
14      We designate a committee management officer  
15      and a Designated Federal Officer for each  
16      advisory committee and its subcommittees.

17                      We provide a written determination  
18      stating the reasons for closing any advisory  
19      committee meeting to the public, and we have  
20      to review at least annually the need to  
21      continue each advisory committee consistent  
22      with the public interest and the purpose of

1 each advisory committee. So every year we  
2 have to submit a report on the NOSB and  
3 whether or not the NOSB should continue to  
4 function as an advisory committee.

5 We also determine that staff,  
6 experts and consultants to advisory committees  
7 are justified and levels of agency support are  
8 adequate. We develop the procedures to assure  
9 that the committees' recommendations will not  
10 be inappropriately influenced by the  
11 appointing authority or by any special  
12 interest, but will instead be the result of  
13 the committee's independent judgment.

14 We also are responsible to assure  
15 that the interests and affiliations of  
16 advisory committee members are reviewed for  
17 conformance with applicable conflict of  
18 interest statutes, regulations issued by the  
19 Office of Governmental Ethics, including any  
20 supplemental agency requirements and other  
21 federal ethics laws. There's a lot of  
22 different things that we're responsible for to

1 make sure that these are operating  
2 appropriately for the National Organic  
3 Standards Board.

4 AMS' Designated Federal Officer,  
5 which is myself, to the NOSB is the NOP deputy  
6 administrator. The Designated Federal Officer  
7 is the one that calls the meeting, that  
8 attends the meeting, and adjoins the committee  
9 meetings. That means the NOSB meetings are  
10 called and adjourned by the Designated Federal  
11 Officer.

12 We develop and approve the  
13 agendas. Obviously with lots of input from  
14 the National Organic Standards Board, but it's  
15 our responsibility to develop and approve the  
16 NOSB agenda. We maintain the required records  
17 and we retain the budgets, we ensure efficient  
18 operations and adherence to FACA and other  
19 laws, we develop committee reports for the  
20 committee management officer and we must  
21 submit an annual report on Board activities,  
22 meetings and expenses. So we have lots of

1 things that we do to support administratively  
2 the operation of this Board and the important  
3 work that the Board does.

4 So if you put FACA and OFPA  
5 together, OFPA doesn't direct the NOSB to  
6 decide. OFPA asks NOSB to assist in the  
7 development of standards, to provide  
8 recommendations, to evaluate substances, to  
9 develop proposed national lists and proposed  
10 amendments to the list for submission to the  
11 Secretary. So you all are making very  
12 important recommendations, but they're not  
13 implemented unless the USDA AMS goes through  
14 the process to adopt them through rule making  
15 or guidance or policy.

16 The Secretary -- and that  
17 authority has been delegated by the Secretary  
18 to the Agricultural Marketing Service, retains  
19 the decision making and rule making authority.

20 Okay. So one of the things that  
21 we found in the assessment process, lots of  
22 questions about the nominations process. How

1 do people get nominated, how people do get on  
2 to the National Organic Standards Board. The  
3 nomination process takes about a year, and I'm  
4 going to go through briefly the steps involved  
5 in the nomination process.

6 First of all, we prepare a Federal  
7 Register call for nominations, an outreach  
8 plan, and complete the clearance process to  
9 publish the Federal Register notice.

10 Secondly, we announce the call for  
11 nominations, we target having the announcement  
12 open for about two months. Then the  
13 applications come in, we review those  
14 applications for completeness and for some  
15 basic requirements, for instance whether or  
16 not those applicants fit the requirements  
17 under the OFPA categories.

18 Next we vet those qualified  
19 candidates against the exclusion criteria.  
20 There's some folks that are not eligible to  
21 serve on the Board, if they're a registered  
22 lobbyist or if they are on another advisory

1 committee, they can't serve on more than one  
2 advisory committee at a time.

3           Next -- it looks like we skipped  
4 number five there. I don't know what happened  
5 to number 5. We go from four to six. We  
6 interview the qualified and vetted candidates  
7 and we prepare a slate, an information summary  
8 about the qualified and vetted candidates for  
9 the Secretary's consideration. Then the  
10 Secretary selects that appointee and the  
11 appointee announced and the term begins in  
12 January.

13           Okay. So there's a range of  
14 factors that are considered in evaluating  
15 those applicants for the Board. First of all,  
16 the OFPA categories of seats to be filled,  
17 that's a mandatory requirement. Second of  
18 all, we have a recommendation from the  
19 National Organic Standards Board on criteria  
20 for board membership that came out in 1999.  
21 We're going to cover that in more detail in  
22 the next slide. The other things that we're

1 looking at is ability to work collaboratively  
2 with other Board members and with USDA.

3           And then there's -- the Secretary  
4 is very passionate about diversity and wanting  
5 to make sure that the Board represents all  
6 racial and ethnic groups, women and men and  
7 persons with disabilities. Very, very  
8 important to have that diversity of the  
9 American public represented on the National  
10 Organic Standards Board.

11           So in 1999 the NOSB recommended  
12 criteria for board membership. These criteria  
13 are on the NOP's nominations webpage and in  
14 our Federal Register announcements. And  
15 they're used during the candidate evaluations.  
16 So this is an example of an NOSB  
17 recommendation on what are the criteria for  
18 board membership that USDA has implemented in  
19 our process in terms of nomination and  
20 appointment of new board members.

21           The criteria that are in the  
22 Federal Register notice that come from the

1 NOSB recommendation are understanding of  
2 organic principles and practical experience in  
3 the organic community, experience in public  
4 policy, commitment to organic integrity,  
5 ability to evaluate technical information, the  
6 willingness to commit time and energy needed,  
7 and demonstrated experience and interest in  
8 organic production and certification. So lots  
9 of different criteria that are utilized in  
10 this whole evaluation process.

11 So we do have a call for  
12 nominations that's currently open. We're  
13 accepting nominations for four new members.  
14 The members are appointed by the Secretary,  
15 it's a five-year term, it starts in January of  
16 2015 and runs through January 2020.  
17 We're seeking nominations for the following  
18 seats: individual with expertise in areas of  
19 environmental protection and resource  
20 conservation, an organic producer who owns or  
21 operates an organic operation, organic handler  
22 who owns or operates an organic handling

1 operation, and a retailer with significant  
2 trade in organic products.

3 So those of you here that are  
4 sitting in the audience, if you have any  
5 interest in serving on the Board, we'd love to  
6 see your nomination come in so we have a  
7 diversity of folks that can be considered.

8 And as I said, the nomination is open until  
9 May 15. More information is available on our  
10 website, so please consider it, and take the  
11 opportunity to serve up here with your fellow  
12 community members.

13 Okay. Now we're going to move on  
14 to the policies and procedures manual. The  
15 policies and procedures manual is a very  
16 valuable resource for the Board, for the  
17 National Organic Program, and the public.  
18 From 2002 to 2013, the PPM was developed by  
19 the Board with revisions open to public  
20 comment.

21 Moving forward, AMS is taking the leadership  
22 role with the policies and procedures manual.

1 The reason for this is, as you saw from the  
2 earlier slides, is that we're responsible for  
3 that. Under the FACA requirements we need to  
4 provide the guidelines for the Board to  
5 operate.

6 But the policies and procedures  
7 manual is an excellent document. There are  
8 many things that are just -- have been worked  
9 on for years and work really, really well that  
10 will continue to be utilized as we move  
11 forward.

12 So the content of an amended  
13 policies and procedures manual will include  
14 NOP policies and procedures that are related  
15 to the National Organic Standards Board, for  
16 instance the conflict of interest memo that we  
17 sent to the Board last year.

18 There are many parts of the  
19 existing policies and procedures manual that  
20 are working well and will be kept, and there  
21 are some parts that need to be updated and  
22 revised. For instance the Sunset revision

1 component needs to be updated and revised.  
2 If you look at the Sunset revision component  
3 currently, it actually conflicts with each  
4 other. In one part it says that there's a  
5 renewal process, in another part it says  
6 there's a withdraw -- removal process. So  
7 there are things that need to be clarified to  
8 make sure that that policies and procedures  
9 manual is up-to-date.

10 Okay. Moving on to the topic of  
11 work plans. As I presented, AMS drives the  
12 priorities for what the Board considers. The  
13 Board certainly has a voice in this process.  
14 The public may petition additions or deletions  
15 from the National List, and the public may  
16 also submit comments directly to the Board,  
17 and also write to the National Organic  
18 Program. As I said, we do have a way to  
19 comment at any time at [nopguidance@usda.gov](mailto:nopguidance@usda.gov).  
20 So you can submit comments to the National  
21 Organic Program at any time for things that  
22 you feel that we should be working on.

1                   FACA requires that agencies  
2                   effectively use resources, so we're not going  
3                   to be asking for advice that we don't have the  
4                   authority or ability to act upon. So in terms  
5                   of the criteria for adding work plan items,  
6                   first of all, we would look at whether the  
7                   work plan item is within the scope of the  
8                   authority of the Organic Foods Production Act  
9                   and within our scope of authority, under  
10                  Agricultural Marketing Service.

11                  Secondly, whether or not it's a  
12                  priority for USDA and the National Organic  
13                  Program. The item must be a priority for USDA  
14                  and NOP, and something that are able to  
15                  implement in a reasonable time frame. There  
16                  has to be a clear need. The item must reflect  
17                  a clear need from the program and the organic  
18                  community for which information or advice is  
19                  needed. And it could be a need, but we  
20                  already have enough information, so we don't  
21                  necessarily need it to be on the work plan.

22                  There are items -- for instance,

1 last year the Board was working a little bit  
2 on the definition of production aids, but we  
3 already had a recommendation from the National  
4 Organic Standards Board on production aids  
5 from 2005 that we actually have not fully  
6 addressed. So there's no clear need for  
7 additional work to do on that until we have  
8 the time to evaluate the old recommendation.  
9 And then clear scope. We must have a clear  
10 sense of what the intent and scope of that  
11 work plan item is.

12 So we are trying to be more  
13 transparent with the organic community about  
14 work plan items, so we are now sending memos  
15 to the Board about work plan items that are  
16 not under the National List or Sunset review  
17 process, so we've sent memos on ancillary  
18 substances yesterday, improved guidance on  
19 preventing GMO presence in organic products  
20 and assessing soil conservation practices.

21 We think these memos are important  
22 to be transparent to the public, indicate that

1 there is a need for the Board to work on that  
2 particular topic and clarify the parameters in  
3 terms of the scope of the work on this topic  
4 and the authority of that particular work plan  
5 item. So take a look at those memos and we'll  
6 be continuing to use that process in the  
7 future.

8 In terms of the public meeting  
9 agenda, the public meeting agenda is prepared  
10 by the National Organic Program and it's  
11 driven by several factors. Of course the  
12 Board is very, very involved in the  
13 development of the agenda. We're going to be  
14 including work plan items that have yielded  
15 acceptable discussion documents or proposals,  
16 a reasonable time for public comments, make  
17 sure that there's time for presentations and  
18 expert panel and the cross. Those are the  
19 things that we're looking at as we develop the  
20 agenda for these public meetings.

21 And in the future we're looking at  
22 maybe some other ways of doing these public

1 meetings. For instance, a preparatory  
2 meeting, a webinar or face-to-face meeting so  
3 the Board can review the content of the  
4 discussion documents and proposals before  
5 getting into the final decision making  
6 process. We had three meetings that NOSB had  
7 for a couple of rounds that the Board liked a  
8 lot, so we're looking at ways that we could  
9 maybe incorporate that in a more of an open  
10 public session.

11 For this particular meeting  
12 there's only two substantive changes to the  
13 public meeting that's being implemented for  
14 this meeting, and consistent with other FACA  
15 boards, the NOP is co-chairing the spring  
16 meeting. There's not really a lot of change  
17 there. We have more presentations this time  
18 to provide information to the public, but as  
19 soon as we're done with our presentations, the  
20 Chair of the National Organic Standards Board,  
21 Mac Stone, will be running the public comment  
22 process and the subcommittee topics for the

1 next few days.

2 And then secondly there's only  
3 minor adjustments to discussion documents, and  
4 proposals will be allowed before voting. If  
5 public comments lead to substantive changes,  
6 the document is to go back to the subcommittee  
7 before voting. So a little bit more on  
8 substantive change. So some of the questions  
9 or criteria that we're going to utilize to  
10 determine whether a proposal is being  
11 substantively changed are these: is the NOSB  
12 recommendation substantially different from  
13 the subcommittee proposal on which it is  
14 based?

15 So these are the factors that we  
16 will consider: the extent to which a  
17 reasonable person affected by the  
18 recommendation would have understood that the  
19 published proposal would affect his or her  
20 interests, the extent to which the subject of  
21 the recommendation or the issues determined in  
22 it are substantially different from the

1 subject or issues involved in the proposal,  
2 and the extent to which the effects of the  
3 recommendation differ from the effects of the  
4 proposal. So really we're looking for the  
5 proposal that's published to be the one that's  
6 acted upon by the full Board. We will allow  
7 minor changes, as long as they're not  
8 substantively different from what was  
9 proposed.

10                   And then the NOP deputy  
11 administrator or designee will determine  
12 whether proposed amendment or proposal would  
13 be a substantive change, just like we've done  
14 in the past. Substantive change amendments  
15 will be referred back to the subcommittee for  
16 further consideration. Okay. So that was a  
17 lot of information. I hope it was useful.  
18 There's a lot of detail there. And again,  
19 these presentations will be put up on our  
20 website, but there's actually a little bit  
21 simpler presentation that's under the NOSB  
22 February training session. So with that we'll

1 move on. Thank you.

2 CHAIR STONE: Thank you, Miles.

3 So the Board was -- we got some of this  
4 information in February, so I'm going to, in  
5 an essence of time when we're behind -- if  
6 Board members have some follow-up, there's  
7 going to be some more -- I think more around  
8 the Sunset in a little bit, so I'm going to  
9 hold conversation around this right now. At  
10 this time I'm going to ask -- Jean has a  
11 report from the policy development  
12 subcommittee.

13 MEMBER RICHARDSON: Hi everyone  
14 again. Much of the information that I'm going  
15 to say has actually really been covered by  
16 Miles in one form or another, so it's somewhat  
17 repetitive in places, but it is a report of  
18 our subcommittee, or our former subcommittee,  
19 however we look at it, for that last year and  
20 report back on public comment of course.  
21 The members of the subcommittee are myself,  
22 John Foster, Nick Maravell, Mac Stone and Jay

1 Feldman. In 2013 the policy and development  
2 subcommittee worked on conflict of interest  
3 policy and proposed extensive updates to the  
4 policies and procedures manual.

5           These proposed changes were posted  
6 on the public comment -- for public comment,  
7 and they were due to be considered at the fall  
8 2013 meeting in Louisville, which was  
9 cancelled because the government shut down.  
10 We received considerable public comment from  
11 a broad range of stakeholder groups, including  
12 the OTA, NOC, Beyond Pesticides, Consumer  
13 Union, Cornucopia, Center for Food Safety,  
14 several certifying agencies, PC Natural  
15 Markets, Midwest Pesticide Action, and a  
16 number of individuals. And obviously those  
17 came not only in the form of written comment,  
18 but also in reports and memoranda that people  
19 circulated.

20           The work plan for the 2014  
21 subcommittee, that subcommittee I just  
22 described to you, we were going to provide

1 comprehensive updates on the entire policies  
2 and procedures manual ready for public comment  
3 and full discussion and a vote. So this is a  
4 brief report on the public comment we received  
5 last fall and spring, and to explain why our  
6 subcommittee no longer has any work plan items  
7 on its agenda.

8           And again, apologies, some of this  
9 is repetitive from Miles' report. OFPA was  
10 established in the 1990 Farm Bill. OFPA  
11 established the NOSB and authorized creation  
12 of the USDA organic regulations. The policies  
13 and procedures have been part of the work of  
14 the NOSB since 2002. The work was always  
15 collaborative between the NOP and the NOSB, so  
16 that from the year 2002 until 2013, the NOSB  
17 wrote and kept updating the policies and  
18 procedures manual with all of the revisions  
19 being open to public comment.

20           And in fall 2013 when the  
21 government shut down, the NOP and the AMS used  
22 the time in part to reassess how policies and

1 procedures for the NOSB are developed,  
2 approved and implemented. As a result of  
3 consultations between the NOP and Office of  
4 General Counsel, as we heard in some detail in  
5 the -- Miles' report, we were reminded, and I  
6 quote a February memo to us from Miles, "as a  
7 federal advisory committee, the NSOB is not an  
8 independent organization, it does not set  
9 policy or make regulatory changes, decisions.  
10 It exists to advise the Secretary. AMS has  
11 been delegated authority to implement OFPA,  
12 and the AMS and NOP are responsible for  
13 managing the NOSB." End of quote.

14 So thus, as we now understand it,  
15 the AMS, as with other FACA committees, even  
16 though we are somewhat unique as you, again,  
17 heard Miles commenting in his report, the AMS  
18 is responsible for establishing board  
19 procedures and to, "moving forward, the AMS  
20 will take the leadership role on the PPM with  
21 no public comment. However, there will be  
22 consultation as needed with the NOSB as

1 updates are being made."

2 I am not actually sure really what  
3 that means yet. We'll find out. So that  
4 means that, in fact, are no work plan items on  
5 our agenda now. Now most of the working  
6 public assumes that we volunteer Board members  
7 can put work plan items onto our agenda, but  
8 this is not the case. All work plan items  
9 must be preapproved by the NOP. So we can't  
10 just hold our subcommittees and have work plan  
11 items.

12 The NOP reminded us during the  
13 February training that the NOP has a backlog  
14 of work on substances, on guidance and so  
15 forth, and that work plan items must be an  
16 NOP/USDA priority. And I do think that these  
17 changes that, again, Miles clearly presented,  
18 are really important for all of the public to  
19 gain greater clarity on.

20 So they need to be able to  
21 demonstrate a clear need for the NOP or the  
22 organic community. So when the public wants

1 the NOSB to address and issue, then that high  
2 priority need must be clearly articulated and  
3 the item must be something the NOP believes it  
4 should work on and can implement, if the  
5 recommendation is passed by the NOSB and  
6 accepted by the NOP. And as we heard from  
7 Miles, the NOP hopes that this will allow for  
8 a transparent process.

9           On Sunset, what can I say in  
10 brief? We received considerable public  
11 comment on this major change in how substances  
12 are reviewed. One aspect which came up many  
13 times in public comment is the serious concern  
14 that a substance may receive Sunset  
15 determination in the subcommittee and not  
16 actually reach the full Board.

17           The NOSB is aware of this concern  
18 and there has been considerable discussion,  
19 not only amongst Board members, but also in  
20 our February training and right up till even  
21 yesterday. And so the issue of full Board  
22 consideration of Sunset material still needs

1 to have clarification as to the specificity of  
2 procedures in writing. So stay tuned on that.

3 Many members of the public  
4 expressed their concern about the change in  
5 interpretation of the OFPA Sunset provision,  
6 which now requires a decisive two-thirds vote  
7 during Sunset to delist National List  
8 materials rather than a two-thirds vote on the  
9 Board to relist materials. And we will hear  
10 more about this later on and hopefully have  
11 some more conversation on it.

12 Board representation and conflict  
13 of interest. We had considerable public  
14 comment on concern over Board representation  
15 and conflict of interest policies. In March  
16 2013 the NOSB received a memorandum  
17 articulating the new conflict of interest  
18 policy, which is based on FACA.

19 This represents a change from the  
20 simpler NOSB policy in the PPM developed over  
21 the years. Troubling to several members of  
22 the public commenters is the language in that

1 memo on representation. The memo states,  
2 "NOSB members are classified as  
3 representatives under the FACA. Each  
4 representative is appointed to articulate the  
5 viewpoints and interests of a particular  
6 interest group. Representatives are appointed  
7 to speak in a we' term, serving as the voice  
8 of the group represented. And as such, you  
9 are not expected to provide independent expert  
10 advice, but rather advice based on the  
11 interests the groups serve."

12 Some public commenters expressed  
13 concern that this is a narrow interpretation  
14 of FACA, and that it is imperative that every  
15 Board member uses all their accumulated  
16 experience, education and expertise to review  
17 all issues and substances in as broad a  
18 context of information as possible with  
19 up-to-date research data, and for the benefit  
20 of the organic community as a whole, and not  
21 just for one sector of stakeholders.

22 Other public comment expressed

1 concern that the different stakeholder groups  
2 are indeed clearly represented. So --  
3 actually that's not really a concern -- but  
4 anyway, they thought -- they felt that the  
5 diverse perspectives of the sectors that make  
6 up the organic community in the industry are  
7 well represented in the decision making  
8 process.

9           These commenters believe that this  
10 ensures that the organic sector will grow with  
11 integrity and broad support, and the diverse  
12 expertise of the Board members is a resource  
13 for informing Board deliberations. But  
14 ultimately the stakeholder groups must be  
15 represented clearly to ensure decision  
16 outcomes that build broad public trust in the  
17 organic label.

18           So the NOSB was established so  
19 that voices, experience and expertise from the  
20 different sectors of the organic community  
21 could be shared around the table and open to  
22 receive public input.

1                   On process, many commenters  
2 believe, and continue to believe, that the  
3 USDA changes in policies and procedures should  
4 have been subject to public comment before  
5 being implemented. These are substantial and  
6 significant changes in Board and public  
7 process, and they deserve to be discussed in  
8 a transparent manner to ensure ongoing public  
9 trust in the decision making process and the  
10 organic label. We received obviously a lot of  
11 comment that, but we heard more of that this  
12 morning as well.

13                   So, at this juncture, questions  
14 about procedures and policies of the NOSB  
15 should be addressed to the NOP. The NOSB will  
16 continue to work with due diligence to  
17 understand these changed policies and  
18 procedures and we will work rigorously to  
19 review all substances and all issues that come  
20 before us in order to assure the ongoing  
21 integrity of the organic seal, which actually  
22 means a great deal to all of us. At this

1 point I'd like to ask if there are any of the  
2 members of the subcommittee who would like to  
3 add anything else to this report.

4 (No response.)

5 MEMBER RICHARDSON: Thank you.

6 CHAIR STONE: Any follow-up or  
7 questions for Jean?

8 (No response.)

9 CHAIR STONE: Thank you, Jean.  
10 Yes, and I made a brief statement in the  
11 opening that the Board is digesting this  
12 change, if you will, and as Jean ended her  
13 comments that we have your -- the seal. We  
14 have that interest in mind and we're  
15 retooling, recalibrating, how do we uphold the  
16 responsibility that you all see that we have.

17 And we're going to unfold that  
18 here in the next little bit. And I hope that  
19 you will have a little more comfort level in  
20 where we are going forward then. And it is  
21 hard when it sort of lands in your lap, and we  
22 were in conversation to see it coming. So

1 with that, one quick --

2 MR. McEVOY: May I add one --

3 CHAIR STONE: I'm sorry?

4 MR. McEVOY: Yeah, just one thing  
5 I wanted to follow up on was the  
6 representative component of what you're  
7 talking about. My understand is that the  
8 Board members, the committee members of the  
9 National Organic Standards Board can really  
10 either be classified as a representative or a  
11 special government employee. And so the  
12 identification of you as a representative is  
13 really about how you are classified for  
14 conflict of interest and ethics rules.

15 And our understanding is that the  
16 Board members do not want to be considered  
17 special government employees, because if you  
18 are, even though you're not paid by the  
19 government, you still can be considered a  
20 special government employee under FACA rules.  
21 And if you're considered a special government  
22 employee, then different rules go into effect.

1 You basically have to follow the same  
2 provisions of conflict of interest and ethics  
3 as a federal employee. And so that would be  
4 much more burdensome on you.

5  
6 So the reason why we've identified  
7 all Board members as representatives is really  
8 to deal with that particular element of the  
9 FACA rules, that you are representatives, and  
10 you follow representatives conflict of  
11 interest perspective.

12 Separately from that, there are  
13 the different categories under the Organic  
14 Foods Production Act that you all represent,  
15 or you all are appointed because you meet  
16 those particular criteria, and there's  
17 certainly no interest from the program, or  
18 AMS's perspective to not have you use all of  
19 your expertise and all of your knowledge and  
20 abilities to discuss and come to your  
21 determination on the best way to move forward  
22 as a member of the Board. So I think that we

1 need to kind of distinguish the representative  
2 thing under FACA from a broader perspective of  
3 representative.

4 CHAIR STONE: Okay. Thank you,  
5 Miles. One little housekeeping chore before  
6 we take a break. I neglected to have the  
7 secretary, C. Ruben, to read the minutes -- or  
8 acknowledge the minutes, and the Board needs  
9 to approve the minutes of our last meeting of  
10 last April.

11 SECRETARY WALKER: Thank you, Mac.  
12 Again, I'd like to say welcome to the South,  
13 and for fellow Board members at this point we  
14 are trying to -- we would like to put together  
15 the voting of the April 9 through 13 voting  
16 record, as well as the transcript. And I know  
17 all of us have read the 1,500 pages of  
18 transcript, so I'm sure we all agree we can do  
19 it by voice vote on both of these at one time,  
20 Mr. Chairman.

21 CHAIR STONE: Thank you, Calvin.  
22 Does any member have any questions or issues

1 that they saw in review in transcripts or the  
2 record?

3 (No response.)

4 CHAIR STONE: Seeing none, all in  
5 favor of approving the minutes of our past  
6 meeting say aye.

7 (A chorus of ayes.)

8 CHAIR STONE: Any opposed?

9 (No response.)

10 CHAIR STONE: The motion carries.

11 Thank you for that. We will recess and be  
12 back in 15 minutes. When would that be?  
13 Eleven o'clock sharp. Thank you.

14 (Whereupon, a short recess was  
15 taken.)

16 CHAIR STONE: Members of the  
17 audience, if you would take your seats,  
18 please. We're going to stop promptly at noon.  
19 I mentioned to some of the folks upstairs,  
20 Sean is adjusting each of our microphones as  
21 we speak, so if you'll be a little bit patient  
22 with us as we kind of go around the room and

1 give our deliveries, give Sean time to make  
2 those adjustments.

3 So with no further ado, we're  
4 going to reconvene the meeting, and, Miles,  
5 we're going to adjust his timing a little bit  
6 so that we can stop promptly at noon and get  
7 back on schedule. Miles?

8 MR. McEVOY: Okay. We're going to  
9 get started again here with covering the  
10 National List, some rule making procedures,  
11 Sunset revisions, and then NOP report, and  
12 we're going to get all that done before lunch,  
13 I believe. So let's -- I'll turn it over to  
14 Dr. Brines for the materials update and  
15 process overview.

16 DR. BRINES: Okay. Thanks, Miles.  
17 I've got a little bit of everything in this  
18 materials update. It's been a year since we  
19 last reported on the status of outstanding  
20 petitions and technical reports. We do have  
21 a lot of that information that gets reported  
22 on a regular basis through our newsletter,

1 but these slides have got everything  
2 consolidated and it'll be posted on our  
3 website for those that are taking notes.

4           Okay. So I'm just going to go  
5 through by committee, so starting with crops.  
6 So this meeting of the crops subcommittee is  
7 going to be addressing four petitions. Three  
8 of those petitions are to add new materials to  
9 the National List at 205.601. Those are  
10 laminarin, magnesium oxide and vinasse.

11           There's another petition also for  
12 streptomycin, and that's for a petition  
13 amendment to the current annotation at  
14 205.601. So four petitions from the crops  
15 committee at this meeting. And all those  
16 petitions are also posted on our website.  
17 Other petitions that are currently under  
18 subcommittee review that might be coming  
19 forward at later meetings, there's a petition  
20 for exhaust gas, or carbon monoxide, for  
21 underground rodent control, there's a petition  
22 for allyl isothiocyanate, which is used as a

1 pre-plant fumigant or pesticide.

2           There's a petition for aluminum  
3 sulfate, which is connected to another  
4 petition for livestock use. I'll mention that  
5 later. And we received another petition for  
6 an inert ingredient for use in pesticide  
7 products, a petition for propylene carbonate.  
8 Two of those petitions that are currently  
9 under review by the crops committee have a  
10 technical report in development. Once that  
11 technical report is available, it'll be posted  
12 on our website. All four of these petitions  
13 are currently posted on our website.

14           Okay. So moving on to livestock.  
15 At this meeting the livestock subcommittee  
16 will cover a petition to amend the annotation  
17 for methionine on 205.603. Also address a  
18 petition to add the substance acidified sodium  
19 chlorite to 205.603. And there's a number of  
20 aquaculture petitions that I've outlined here.  
21 I won't go through all these individually.  
22 Again, they're on the agenda and this

1 presentation will be posted on the website  
2 shortly.

3 I will just mention briefly that  
4 about half of those aquaculture petitions are  
5 for use in aquatic animal production, and the  
6 other half of those petitions are specifically  
7 for aquatic plant production. For efficiency  
8 they're all being by the livestock  
9 subcommittee due to some overlap in  
10 considerations. Okay. For outstanding  
11 petitions that are currently under  
12 subcommittee review, there's a petition to add  
13 aluminum sulfate to 205.603 of the National  
14 List that's for use in treating poultry litter  
15 for organic livestock producers.

16 The way it relates to the petition  
17 for crops is that that litter -- the intent of  
18 the petition is to use it in organic livestock  
19 facilities, but to also have the ability to  
20 apply that treated litter to organic fields,  
21 so there's overlap between both in crops and  
22 livestock uses. And again, the petition's on

1 the website for those that are interested.

2 We did have one petition that was  
3 drawn from livestock subcommittee review since  
4 our last meeting, and that's a petition for  
5 lignin sulfonate for aquatic animal use.

6 There is another petition for lignin  
7 sulfonate, which is on the agenda for this  
8 meeting, and that's just for the aquatic plant  
9 use, not for animals. And again, each of  
10 those petitions are posted on our website.

11 Okay. So moving on to handling,  
12 at this meeting the Board will be considering  
13 the addition of ammonium hydroxide to Section  
14 205.605 of the National List as a boiler  
15 additive, will be considering the removal of  
16 glycerin from 205.605(b) of the National List,  
17 and also considering the addition of  
18 polyalkylene glycol monobutyl ether, or PGME,  
19 to the National List. And again, those  
20 petitions are all posted.

21 Currently under subcommittee  
22 review that might be coming forward later is

1 three outstanding petitions for handling. One  
2 for gibberellic acid, which has also been  
3 previously considered, and a new petition for  
4 triethyl citrate to add to Section 205.605.  
5 And a petition for whole algal flour, it's an  
6 algae derivative which is petitioned to  
7 205.606. So each of those petitions are  
8 posted on the website, and I think I did  
9 recently get a technical report request for  
10 triethyl citrate, so that will be coming forth  
11 shortly as well.

12 Okay. In terms of the Sunset  
13 materials, I'm just going to briefly mention  
14 the materials and we'll get into process later  
15 this morning. There's three Sunset substances  
16 which are up for review by the crops  
17 subcommittee: aqueous potassium silicate,  
18 which has two listings at 205.601(e) as an  
19 insecticide, and (I) for plant disease  
20 control; sodium carbonate peroxyhydrate, which  
21 is listed under paragraph (a), which is the  
22 algicides disinfectants and sanitizers; and

1 sulfuric acid under paragraph (j), which is  
2 plant and soil amendments. Each of these  
3 substances are fairly recent additions to the  
4 National List, being added in 2010, and  
5 they're up for their first Sunset review for  
6 2015.

7 As part of the review process the  
8 subcommittee did request updated technical  
9 information for each of these three materials.  
10 The program was able to process those requests  
11 and all those technical information updates is  
12 available on the website for public viewing.

13 Okay. Moving on to handling.  
14 There are no livestock Sunset 2015 substances,  
15 so it's just crops and handling for Sunset  
16 this year. There are four Sunset substances:  
17 gellan gum; two of the cooking wines, Marsala  
18 and Sherry, which on 205.606; and tragacanth  
19 gum. There are no new technical information  
20 for these four substances, so the subcommittee  
21 is proceeding with the currently available  
22 information.

1                   Okay. So I do have a little bit  
2 of this presentation which is devoted to  
3 process. And it's important to clarify sort  
4 of NOP's role in the process and  
5 distinguishing that from the Board and  
6 subcommittees' process. So I'll go through  
7 some of our internal procedures that we use in  
8 terms of processing petitions and take us  
9 through the process to come into the Board  
10 recommendation.

11                   So the petition process is  
12 mentioned under the Organic Food Production  
13 Act under Section 2119 that the Board shall  
14 establish procedures under which persons may  
15 petition the Board for the purpose of  
16 evaluating substances for inclusion on the  
17 National List. That provision is included in  
18 the regulations at 205.607 on amending the  
19 National List.

20                   Again, repeating that any person  
21 may submit a petition, and that individuals  
22 can request a copy of the petition procedures

1 from the USDA. We do also have the current  
2 petition procedures posted on our website, but  
3 we can mail hard copies when needed. So what  
4 do the guidelines say? The most recent  
5 version was published in the Federal Register  
6 back in 2007. The guidelines explain what  
7 information needs to be included in a  
8 petition. So common questions we get, you  
9 know, what is the form, what's the template.  
10 There's no specific form or format or template  
11 that's required. Additionally, there's no fee  
12 or cost to petition, which is sometimes  
13 surprising to petitioners. So it's at their  
14 discretion, but they do need to hit all the  
15 information that's in the current guidelines.

16           Petitions can contain confidential  
17 business information according to the 2007  
18 petition guidelines. However, that  
19 confidential business information is not  
20 posted on the website, it's not available to  
21 the NOSB. And I know that's a topic that  
22 we'll be discussing later this meeting, and

1 some of the -- hopefully alleviating even some  
2 of the problems that have been happening with  
3 CBI.

4           Okay. So what's the program's  
5 process? We receive the petition, so when we  
6 get a new petition, we confirm receipt with  
7 the petitioner, we do review all incoming  
8 petitions for both eligibility and  
9 sufficiency. Generally that review is  
10 completed within 30 days, although some more  
11 complicated things may take longer. We're  
12 also the primary point of contact for any  
13 correspondence between the Board and the  
14 petitioner. So if the petitioner has  
15 questions about status, they can direct those  
16 questions through the program. If the Board  
17 has questions for the petitioner that they  
18 need a response to, those requests need to  
19 come through the program. That's to ensure  
20 that we have appropriate records for all that  
21 communication.

22           Again, as part of our review we're

1 looking to make sure the petitions are  
2 eligible and complete when they're distributed  
3 to the subcommittee. We do use check lists to  
4 facilitate that process. It's essentially  
5 going section-by-section through the  
6 guidelines to ensure that the petitioner has  
7 addressed each of the information.  
8 We're not doing a quality check or a technical  
9 review at this stage, we're just looking to  
10 make sure that that information has been  
11 included.

12 We do let the petitioners know  
13 upon acceptance of the petition, when it goes  
14 to the Board, that acceptance of a petition by  
15 the program for review by the Board is really  
16 just an administrative manner. It doesn't  
17 reflect a decision by the program on any of  
18 the merits of the petition.

19 We do sometimes have  
20 correspondence back and forth with the  
21 petitioners before that petition will go to  
22 the Board, and often that's to the point of

1 directing the petitioner, Well, you say  
2 there's no alternatives, maybe you should  
3 mention what people are doing now. Trying to  
4 fill out information or questions that we  
5 might anticipate come up during the review.

6 Often other examples might be that  
7 the petitioner didn't know that the substance  
8 has been previously reviewed by the Board, so  
9 we might encourage them to include some of  
10 that information in their petition if it's  
11 relevant. Okay. So at the point that Program  
12 has determined that the petition is eligible  
13 and complete, we post the petition on our  
14 website, and at that point the appropriate  
15 subcommittee is notified that the petition is  
16 available for review.

17 According to the policies and  
18 procedures manual, the subcommittee should  
19 complete its initial review of that petition  
20 within 60 days of receipt, and at that stage  
21 they can request a technical report if  
22 necessary, or they can ask for additional

1 information from the petition. And again, if  
2 additional information is needed, that request  
3 is submitted from the subcommittee to the  
4 program, and we'll draft a letter to the  
5 petitioner with any requests.

6 As part of the process, sometimes  
7 petitions do get updated throughout the  
8 process. Sometimes those updates are  
9 responses to specific subcommittee requests.  
10 In that case we usually instruct the  
11 petitioner to format their response so that it  
12 can be posted as an addendum to their petition  
13 on the NOP website. That way, for  
14 transparency, that information is available to  
15 the public as well.

16 We do occasionally get updates  
17 that are unsolicited, so the petition had new  
18 information that has come up that they want to  
19 update their petition with. They can do that  
20 at any time. They can submit the -- a new  
21 version of the petition or they can submit  
22 updates.

1                   And we generally try to tell them  
2                   -- to encourage them just to do a single  
3                   submission if possible, so we don't have to  
4                   manage multiple addenda. But that's not  
5                   always -- it doesn't always work out. But we  
6                   do post those updates alongside the original  
7                   petition on our website, so all the  
8                   information is available to the public.

9                   Okay. So what happens if the  
10                  subcommittee requests a technical report?  
11                  These reports -- the contracting side is  
12                  handled by the program. The reports  
13                  themselves are completed by third-party  
14                  contractors and NOP manages those contracts.  
15                  The technical report contractor has access to  
16                  the full petition, any past reviews of the  
17                  substance, and the current templates for  
18                  technical reports.

19                  And the questions that are  
20                  included in the technical reports for either  
21                  crop, livestock or handling, align with the  
22                  OFPA criteria. So it doesn't necessarily

1 include everything about a substance, but it  
2 does include everything that the Board is  
3 required to consider under OFPA. It may not  
4 include proprietary information or  
5 confidential business information in the  
6 report.

7 And also the reports generally  
8 don't cover economic impact information. It's  
9 an important criteria that the program has to  
10 consider before we do rule making, but it  
11 hasn't traditionally been a part of the  
12 technical report process.

13 When we do do the reports, because  
14 NOP is managing the contract, we do have a  
15 responsibility to accept the quality accuracy  
16 and completeness of technical reports. So  
17 it's our expectation when we send the reports  
18 to the subcommittee that the technical reports  
19 meet the requirements of the contract and  
20 shouldn't need further revisions. So again,  
21 we do review the reports before they're  
22 distributed to the subcommittee, and that's to

1 ensure that they meet the contracting  
2 requirements and that they're complete before  
3 they go to the subcommittee.

4 We do have a date in the footer  
5 that some have noted that are in the technical  
6 reports. That's generally the date that the  
7 report was submitted by the contractor to NOP.  
8 It doesn't always correlate with the posting  
9 date on our website. There is sometimes a  
10 delay due to Program review or subcommittee  
11 review, but we keep that date as the date that  
12 it came in from the contractor.

13 Okay. One other note about  
14 technical reports. Occasionally we have  
15 requested assistance from subject matter  
16 experts in the Agricultural Research Service,  
17 or ARS, in the technical review of draft  
18 reports, generally that's for complicated  
19 things where we might want someone with a  
20 technical eye to take a closer look at a  
21 couple of different areas.

22 When that has, the pre-review has

1 occurred, we do note that in the distribution,  
2 when we send it to the subcommittee, that we  
3 asked a subject matter expert to look at it  
4 from ARS, which is a different USDA agency.  
5 Okay. So as Miles mentioned, I think, in his  
6 presentation, there are certain criteria for  
7 evaluation of materials. Those criteria are  
8 outlined in the Organic Foods Production Act.  
9 Both the petition guidelines and the technical  
10 report questions, as well as the NOSB check  
11 list, are designed to align with those OFPA  
12 criteria, so that it can be documented that  
13 the substance was evaluated against those  
14 criteria.

15           There are different criteria  
16 depending on the use of the substance. So  
17 production has different criteria than  
18 handling or processing. And there are  
19 additional criteria for synthetic processing  
20 aids, which are in the regulations at  
21 205.600(b). Okay. So a quick note about the  
22 check list, which are part of the NOSB

1       subcommittee proposals. Check lists are  
2       intended to be a tool to facilitate and  
3       document review of the petition substance  
4       against the OFPA criteria.

5                       So those questions and the check  
6       list come straight from OFPA. OFPA doesn't  
7       require the check list, so it's really just a  
8       tool. It does require, under OFPA, that the  
9       Board considers seven different criteria  
10      before making its recommendation. So again,  
11      a tool to document the evaluation. And I know  
12      working with some of the subcommittees,  
13      sometimes it's easy to get hung up on the way  
14      the check list is set up, on whether to check  
15      the yes box or check the no box for some of  
16      these complicated things, because sometimes  
17      when you're evaluating a substance, it's not  
18      so black and white and there might be some  
19      gray areas.

20                      And so rather than focus on, you  
21      know, are you checking the right box, we  
22      really want to encourage the subcommittees to

1 use the narrative responses within the note  
2 section to describe how they evaluated the  
3 substance. Because really the evaluation is  
4 the most important. The yes and no check  
5 boxes, you can get into long debates which box  
6 is correct, but the narrative responses really  
7 do demonstrate that the Board completed its  
8 responsibility to evaluate the substance  
9 against that criteria.

10 Okay. So Miles mentioned this  
11 previously, but in bringing forth those  
12 proposals to recommendations, just to mention  
13 again, if there are substantive changes  
14 between the proposal and what happens at the  
15 meeting, that's, you know, fine and reasonable  
16 to, you know, to make changes based on public  
17 comment, but we want to make sure that if  
18 there substantive changes, that those changes  
19 go back to subcommittee first for  
20 deliberation. It would allow for another  
21 public comment opportunity before the Board  
22 considers passing the recommendation.

1                   So we want to make sure that  
2                   there's full consideration to any changes.  
3                   Sometimes things and seem minor, but then when  
4                   we get to the rule making stage at the  
5                   programming side -- the program side, it can  
6                   be challenging. So we want to make sure to  
7                   work out those little details so that we can  
8                   take action on the recommendation as it's  
9                   submitted.

10                  Okay. So a quick note about voting procedures  
11                  for petitions. So the Board does take two  
12                  votes on each petition substance. The first  
13                  motion, or first vote is a classification  
14                  vote.

15                               That's generally only for things  
16                               that have not been previously classified, so  
17                               you would be classifying a substances either  
18                               a synthetic or non-synthetic, or for handling  
19                               and processing materials, agricultural or  
20                               non-agricultural.

21                                       Then the Board would proceed to a  
22                                       second motion which is generally to list, to

1 remove or to amend an annotation. And for  
2 each of those motions they need a decisive  
3 majority in order to pass, so that's  
4 two-thirds under OFPA, or ten votes out of 15  
5 members. Okay. So lots of pieces to this.  
6 Lots of parts that make up the Board  
7 recommendation. It's easy sometimes to focus  
8 on any one particular piece of this puzzle,  
9 but really they all play an important role.

10 So there's the petition, the  
11 request from an individual organization to  
12 change the list, there's third party technical  
13 information, there's public comment, there's  
14 the proposal from the subcommittee, but the  
15 recommendation comes from the full board, and  
16 can draw from any of these inputs. So it's  
17 important to think about all of them in  
18 context, but not any one particular input is  
19 more important than the others. Okay. And  
20 all are encompassed by the OFPA criteria,  
21 which is what we're working off of.

22 I think I'm going to pause there.

1 I do have some slides on the status of the  
2 inerts working group, but I think due to time  
3 constraints, we might kick that to the crops  
4 subcommittee agenda tomorrow. Looking, does  
5 -- he has the -- we'll see how time goes. I  
6 think -- all right, we'll hold that for now  
7 and move on. Thanks.

8 MR. McEVOY: Okay. Thanks, Lisa.  
9 Any questions on that from Board  
10 members? Yes, Jennifer.

11 MEMBER TAYLOR: Before you put the  
12 circle around it and identified it as to  
13 criteria, I was wondering if you wanted to  
14 also include a circle or a square for the  
15 impact of the program on the Board  
16 recommendation.

17 DR. BRINES: Well, we don't take  
18 action on a Board recommendation until it  
19 passes the Board. I guess --

20 MEMBER TAYLOR: But in the  
21 development of the work plan, in development  
22 of the issues that should be addressed --

1 DR. BRINES: Oh, I see. Yeah,  
2 this -- I guess the context for this graphic  
3 is really just to address petitions, so these  
4 are things that generally come unsolicited  
5 from the program that are requests from the  
6 public to make a change to the National List.

7 MR. McEVOY: Okay. Jay?

8 MEMBER FELDMAN: Thank you. Thank  
9 you for that presentation. Can you give me an  
10 example of a scenario where you would turn  
11 back a petition as being lacking or  
12 insufficient in some areas?

13 And as a follow-up to that  
14 question, I notice, you know, we get into this  
15 debate about single ingredient reviews versus  
16 mixtures, and I notice that from time-to-time  
17 the Board receives, you know, materials that  
18 are actually mixtures as opposed to single  
19 ingredients. Would that be the kind of thing  
20 that would get screened out, or could get  
21 screened out in your evaluation process?

22 DR. BRINES: Okay. Yeah, I'll

1 answer those each individually. There's lots  
2 of examples of incomplete or ineligible  
3 petitions. We get a number of petitions for  
4 brand name products that we have to turn back  
5 because we only petitions for generic  
6 materials.

7 Often we return petitions because  
8 they're in process still with either FDA or  
9 EPA in terms of the their regulatory status,  
10 so they're trying to do both, get organic  
11 approval at the same time they're working  
12 their way through FDA, and we won't accept  
13 petitions until they've already received a  
14 status through FDA or EPA, so we don't preempt  
15 that. And we return a lot of incomplete  
16 petitions that don't describe alternatives as  
17 well.

18 In terms of single substances,  
19 there have been instances where the program  
20 has moved forward petitions for certain  
21 classes of materials, generally on the basis  
22 of other things that are on the National List.

1 So as an example of a petition on the agenda  
2 at this meeting are the vitamins for aquatic  
3 livestock, aquatic animals, and also the  
4 petition for vaccines for aquatic animals as  
5 well. So in that case it's a substance that's  
6 already been evaluated and recommended as a  
7 group listing by previous Boards and has been  
8 implemented into the regulations. Thanks.

9 MR. McEVOY: Okay. We're going to  
10 move on to presentation on -- a brief  
11 presentation about the rule making process, so  
12 Dr. Bailey will give that presentation. Thank  
13 you.

14 DR. BAILEY: Well, while we get  
15 the presentation up, this is one of my  
16 favorite topics to talk about, so glad to have  
17 a few minutes on the agenda to do it today.  
18 Okay. So this would be a very condensed  
19 version of the one that we provided to the  
20 Board in February, so I encourage you, if you  
21 want more details, to refer to that more  
22 detailed presentation on our website.

1                   The purpose of giving this brief  
2                   overview is sort of for three reasons. One,  
3                   to response to some public feedback that we've  
4                   gotten where people don't fully understand  
5                   what happens once a Board recommendation comes  
6                   to SCA, what does the rule making process look  
7                   like?

8                   Also to just sort of give you some  
9                   sense of the long journey that these rules  
10                  that we work on have to take to see the other  
11                  side. And finally, to provide the public with  
12                  a little more information about what is  
13                  already out there that you could access, and  
14                  how you can contribute to the process along  
15                  the way. Okay. So every rule making action  
16                  that we undertake has to be supported by some  
17                  legal authority. We turn to OFPA as that  
18                  legal authority for us to write regulations  
19                  and that would implement that law.

20                  So if you think of OFPA, in a way,  
21                  as a house that provides the boundaries under  
22                  which we operate, it provides the foundation,

1 some of the walls, the roof, and the  
2 responsibility of NOP is to fill in some of  
3 the details of that house, what does the  
4 finished work look like, what are some further  
5 details we can provide to the community about  
6 how to actually implement the law.

7 We can only issue rules that are  
8 within the scope of our -- of that house, of  
9 that authorizing statute. So for example we  
10 could not propose a rule to have some new  
11 requirements for toy safety. We need to  
12 operate under the requirements of the statute.  
13 And we have our own procedures that we have to  
14 follow, every federal agency has to follow  
15 these, they're not unique to NOP. We have to  
16 issue rules in accordance with something  
17 called the Administrative Procedures Act, or  
18 APA. And what that means is it sort of sets  
19 the responsibilities of the agency to provide  
20 for notice and comment on rule making actions  
21 and some other details.

22 It also provides and outlines some

1 of the exemptions to the APA. Often there are  
2 some military actions that don't need to go  
3 through that rule making process and general  
4 statements of policy do not have to go through  
5 notice and comment under the APA.

6 So, three bullet points, it's  
7 looks pretty simple. Publish a proposed rule  
8 in the Federal Register. The Federal Register  
9 sort of is our -- almost like a federal  
10 newspaper, if you will, that puts out all the  
11 rules, final rules, notices, presidential  
12 documents that the government may want the  
13 public to be aware of.

14 Then we provide interested parties  
15 with an opportunity to comment and show data  
16 about the proposal that we've made. And  
17 third, publish a final rule in the Federal  
18 Register notifying people of our decision. In  
19 fact, it is quite a bit more complicated. And  
20 the Board meeting I unveiled what we call the  
21 scroll, so I'll do that here as well, just to  
22 give you a sense of really all the steps it

1 takes, that it's not just these three steps,  
2 it's much more than that.

3 So I think Michelle's going to  
4 help me with this. And the details aren't  
5 important, though you're welcome to look at  
6 this during the break if you want to. It's  
7 just to give you kind of a visual sense of  
8 what we -- the process that we go through.

9 (Pause.)

10 DR. BAILEY: So what this -- and  
11 this is after the Board recommendation. So if  
12 you start right at the beginning, I'm going to  
13 talk about a few of the steps along the way  
14 without too much detail. Okay. So given this  
15 and the scroll, what happens once we get a  
16 Board recommendation, how does the program  
17 actually initiate rule making? And the first  
18 step, for us, is that we prepare something  
19 called the regulatory work plan for every  
20 stage of the rule making process.

21 That document is used to  
22 communicate sort of up the line, so to speak,

1 about the objectives, the possible  
2 alternatives that we've considered to whatever  
3 we'll be proposing and the effects of what  
4 we're proposing really to non-technical folks,  
5 so oftentimes, you know that we're talking  
6 about, a lot technical details here. We're  
7 figuring out how to communicate that in a  
8 non-technical way to people who have to  
9 approve these work plans.

10           It's an important stage because it  
11 provides information needed for something  
12 called significance of the action, and I'll  
13 talk a bit more about that and why it's  
14 important in a moment. And it really is an  
15 important communication that we use to explain  
16 to Office of Management and Budget, who I'll  
17 also talk a bit more about, and the public  
18 about what the agency intends to work on  
19 through rule making. And I'll touch on where  
20 you can actual reach out to find a listing of  
21 what work plans are on the regulatory plan,  
22 not just for USDA but for the entire federal

1 government.

2 So it's come up at Board meetings  
3 in the past, we talk about the rule of Office  
4 of Management and Budget, or OMB, regularly.  
5 We specifically work within -- with an office  
6 within OMB called the Office of Information  
7 and Regulatory Affairs, or OIRA, and they  
8 serve multiple important roles across the  
9 federal government for regulations.

10 They operate to aggregate  
11 information across agencies, and facilitate  
12 coordination across agencies for regulation.  
13 So you can imagine it's important, even within  
14 the Board's work and our work. There's  
15 overlap -- Lisa just mentioned EPA and FDA --  
16 there's overlap in the work that we do. We  
17 need to have a mechanism to be able to talk to  
18 each other about what our activities are. So  
19 OMB sort of serves that point of contact.

20 They also have interest and  
21 consideration of the cost and benefits of  
22 regulations. Every year they report to

1 Congress en masse, the sort of overall cost  
2 and benefits of regulations that the  
3 government has done in a given year. They  
4 ensure public engagement in the process, so  
5 they're always looking for the importance of  
6 providing comment in rule making activities,  
7 and ensure compliance with other statutes that  
8 we have to meet. One example being the  
9 Paperwork Reduction Act, and I'll touch on  
10 that as well.

11 So with all the rules moving  
12 through the government, they certainly can't  
13 review every single one of them. So there's  
14 this system by which they designate every  
15 action through our work plan that we provide,  
16 and it falls into two categories. One is not  
17 significant, in which case OMB does not review  
18 the rule. For the purposes of organic this is  
19 typically -- many of our National List rules  
20 are not considered significant by OMB.

21 Or they can consider it a  
22 significant, or even economically significant

1 action, in which case OMB will review the  
2 rule. And you'll see some of the things  
3 they're looking for and how that does extend  
4 the review time for our regulations. For  
5 criteria they use to establish the  
6 significance designation for a rule, and  
7 they're outlined here, in brief, they look at  
8 the annual affect on the economy of 100  
9 million or more, or sector of the economy that  
10 you might be impacting that could trigger a  
11 significant designation.

12 If you'd be creating serious  
13 inconsistencies with another agency, they'd  
14 like to see that and perhaps provide comments  
15 if you'll be altering the budgetary impact of  
16 the government. So if you're going to be  
17 starting up a new program but maybe you don't  
18 have the resources to do it, they want to know  
19 that, or if it raises novel legal or policy  
20 issues.

21 It's important to note that rules  
22 that have an effect of over 100 million or

1 more on the economy are considered at this  
2 even higher threshold of economically  
3 significant, which means that it triggers  
4 Congressional review, which extends -- the  
5 bottom line there is it extends review time at  
6 the other end before you can get a final rule  
7 in effect. So it's creates an additional  
8 layer, if you will, to the clearance process  
9 and review.

10 In front of us -- I know here  
11 right now we have -- in addition to some  
12 non-significant National List rules, we have  
13 I believe six significant actions that OMB has  
14 designated and will want to see as they move  
15 their way through the process.

16 So how to you as stakeholders know  
17 what rules agencies are working on? Once OMB  
18 approves their work plan, this does appear  
19 twice a year in various documents that are  
20 published in the Register. And, in fact, on  
21 OMB's website they provide an agenda of  
22 regulatory actions that you can look up. You

1 can click on the different agencies that will  
2 provide an abstract of those actions for you  
3 to read.

4 And I believe, as of the fall  
5 2013, there's 131 USDA actions on the agenda.  
6 Within AMS we had I think eight of the eleven.  
7 So we have a pretty significant portion of our  
8 particular agency's regulatory agenda at this  
9 point. Once we've drafted all of the  
10 background, we read our rules in the Register,  
11 you'll notice there's sort of a structure to  
12 them. There's the background that goes  
13 through the Board history, what we're actually  
14 -- what our overview of the amendment is, what  
15 we're actually proposing to do, how that would  
16 affect people.

17 There's also a whole section of  
18 what we call sort of supplementary analyses.  
19 These are executive orders and other  
20 requirements that the federal government  
21 agencies are required to go through. I'll  
22 just touch on a few. The point is just to let

1 you know those are other things you'll see in  
2 our rules, and each of them requires their own  
3 analysis and work by the staff.

4           So the first one, starting at the  
5 top, was set by two executive orders called a  
6 regulatory impact analysis where the agency is  
7 required to evaluate the costs benefits and  
8 discuss any alternatives that they could have  
9 considered and what the cost implications  
10 would be from doing so when we're changing the  
11 regulations. This is typically part of our --  
12 or is part of all of our significant rules.

13  
14           So as one example, we had expected  
15 the aquaculture rule to be not significant.  
16 OMB believed it was significant, and therefore  
17 we ended up having to prepare a cost benefit  
18 analysis to support that regulation, which  
19 took additional time.

20 Another important example is looking at the  
21 Regulatory Flexibility Act. This is done for  
22 not significant and significant rules, and the

1 important take away here is we have to  
2 evaluate, again, cost and benefits as it  
3 pertains to small entities and businesses.

4 Small Business Administration is  
5 interested in agencies' regulatory flexibility  
6 analysis. For organics the majority, not all  
7 but the majority fall under the criteria that  
8 would be considered small businesses. So this  
9 is always an important thing we need to go  
10 through. And the goal is to look for ways in  
11 which small businesses could comply in the  
12 least burdensome manner.

13 For some of our rules, if there is  
14 going to be a new record keeping or reporting  
15 burden, we have to prepare a Paperwork  
16 Reduction Act section that basically seeks  
17 from OMB approval to add that reporting and  
18 record keeping burden to their organic  
19 producer or certifying agents, whoever might  
20 be impacted by the new requirement. So that's  
21 a whole other process that we need to go  
22 through.

1                   So these are just some examples to  
2                   give you a flavor of the additional work that  
3                   the staff goes through to get these rules  
4                   through the process. So, great. We say we  
5                   finished the draft. So if you look at that  
6                   scroll, just to keep you a little navigated,  
7                   we're still almost at the beginning where that  
8                   glass is at this point.

9                   So it depends -- how we clear  
10                  rules for publication really depends and  
11                  hinges on that significance designation. So  
12                  on one side of the slide here you can see I  
13                  have not significant action, the people who  
14                  need to review and clear off on those actions.  
15                  On the other side you can see there's a whole  
16                  lot of people who get added to the list in red  
17                  there, and you have a significant action.

18                  And at the sort of bottom of that  
19                  list you see OMB has a minimum 90-day review  
20                  time. So that's about three months that OMB  
21                  has to review and make comments on significant  
22                  actions. They could approve it, more often

1 they have comments that you need to address,  
2 and then they'll need to review it again.  
3 Then after you made changes to the rule we  
4 need to get legal review again to clear it off  
5 for publication.

6 So it's just -- it's a long haul  
7 and we do a lot of work after we've drafted  
8 rules just to facilitate this up the line,  
9 because if you have 131 rules at USDA that are  
10 all competing for people's time to clear these  
11 out, it's a lot of cultivating those things so  
12 that we can get them published on behalf of  
13 the organic community.

14 So why does rule making take so  
15 long? You can see I've divided it into two  
16 stages here. The take away that I'd like you  
17 to have from here is, is we're kind of part  
18 way down the scroll. Now we've got it  
19 cleared, we published a proposed rule, we've  
20 taken public comments. We get to start this  
21 process all over again for the final rule. We  
22 need to do another work plan, we need to do

1 additional analyses if it's a significant  
2 action. So it's just a robust process. And  
3 for a purpose, because we want to make sure  
4 whatever changes we're making in the  
5 regulation are well-considered.

6 So how can comments, public  
7 comments, affect the final outcome of the  
8 final rule? The notice and comment process,  
9 as you know, typically we provide 60 days of  
10 public comment on most things. That can vary  
11 depending on the significance of an action or  
12 they need to get something done quickly.

13 Anyone can submit a comment on any  
14 part of a proposed rule. It's most helpful  
15 when people are specific in their comments to  
16 us. In particular, providing alternatives to  
17 what we proposed. Sometimes we feel -- we  
18 find that people may comment generally that  
19 they don't like the rule, but aren't providing  
20 the agency with guidance on what they'd like  
21 to see instead.

22 The process is not like a ballot

1 initiative or an up-and-down vote in a  
2 legislature. The agency is not permitted to  
3 just base the final rule on the number of  
4 comments in support of it versus there is to  
5 oppose it. Instead, we have to base our  
6 reasoning and conclusions on the rule-making  
7 record, which consists of comments, data, any  
8 expert opinions we might seek, or facts  
9 accumulated during the pre-rule and  
10 proposed-rule stage.

11 And if the rule-making record  
12 contains persuasive new data or sound policy  
13 arguments, the agency may decide to terminate  
14 the ruling making effort and start over with  
15 a new proposal, or the agency may decide to  
16 continue the rule making but change aspects of  
17 the rule to reflect the new issue. So there's  
18 a number of directions we can go based on  
19 public comment. We can't really change things  
20 too far outside of scope based on comment and  
21 finalize that. Often, you'd have to take it  
22 back to a proposed rule at that point.

1                   An important note, just so people  
2 understand how the Federal Register and the  
3 Code of Federal Regulations work together.  
4 The CFR is where you should be looking for  
5 what the most current requirements are. What  
6 happens is the Federal Register staff take  
7 everything that's published in the Register  
8 and they're the ones responsible for updating  
9 the CFR whenever it needs to be updated.

10                   So some of our rules go in effect  
11 the day after publication, some 30 days after  
12 publication, sometimes months after  
13 publication. The Federal Register team will  
14 keep track of all of those and make those  
15 changes when we've basically asked them to  
16 make them. So I always encourage people, we  
17 all have our printed copies of regulations,  
18 and that's nice to have, that it's important  
19 you always go back to the CFR for the most  
20 up-to-date information.

21                   And in summary, really why is this  
22 whole process important for us? It's

1 important because if we end up in sort of a  
2 legal battle, courts can find or rule that we  
3 went all the way through this process with  
4 unlawful -- if it's arbitrary and capricious,  
5 an abuse of discretion, not in accordance with  
6 the law. So we need to be able to look at the  
7 facts presented and the data and make a  
8 logical outgrowth or argument based on that  
9 information that comes down to the final rule.

10 They can find it unlawful if it's  
11 in excess of the agency's statutory authority.  
12 That's why we have legal review for anything  
13 that you're seeing published in the Federal  
14 Register. That's the rule of our attorneys is  
15 to help us through that process. Or, if the  
16 agency did not follow proper procedure in  
17 putting forth the rule. So the process really  
18 is a long process, but there's a lot of  
19 important reasons and things along the way for  
20 us to go through. And I am excited. We  
21 have a number of rules, as Miles mentioned,  
22 that are getting really into the thick of

1 things in terms of clearing them out, and so  
2 it should be a great, hopefully, rest of the  
3 year.

4 Oh, and the last slide. If anyone  
5 is a much of a policy wonk as I am, these are  
6 some good resources that -- if you want to  
7 learn even more about the process, you can  
8 read and hopefully they're helpful to you.  
9 Thank you.

10 CHAIR STONE: Thank you, Melissa.

11 When we were educated on this  
12 process, it helped us to understand at the  
13 Board level of how we craft the proposals, the  
14 language that we include in the proposals to  
15 be clear and concise and also how our  
16 conversation around the table here can feed  
17 the data and the information and the  
18 background that the Standards staff needs when  
19 they go into this rule making process and  
20 defend their actions, if you will.

21 I know a couple of meetings ago,  
22 there was concern that we, quote, had a

1 pre-meeting and there was lack of deliberation  
2 at the microphone, and the audience felt they  
3 weren't quite sure of what was happening. I  
4 urge you all to -- it's not a pre-meeting, but  
5 it's a sort of walk-through, which is very  
6 different, which just allows us to have --  
7 understand a lot of that, to put together a  
8 better work product for the Standards staff to  
9 have to do their work.

10 So the Board members now  
11 understand we're going to have these  
12 conversations and you'll see in our proposals  
13 that we're trying to really be sure the  
14 Standards staff has the information they need  
15 across all segments of the thought processes  
16 of the different committee members. So thank  
17 you all for your work.

18 MR. McEVOY: Yes, one thing I  
19 wanted to reiterate is that we've had a lot of  
20 discussion of the economic impact of the rule  
21 making actions, and one of the things that you  
22 have to keep in mind is that -- it's not that

1 the actions that we take can't have economic  
2 impact, it's just that there's a process that  
3 we have to go through with departmental  
4 clearance and with OMB to explain what the  
5 economic impact is.

6 And the more information that we  
7 can get from this process, the NOSB process  
8 about any economic impact of the  
9 recommendations, it just makes our job easier  
10 when we go through the development of the  
11 proposals to get it through the clearance  
12 process.

13 So when we're asking for questions  
14 about economic impact, it's not to slow the  
15 process down, it's just that we need that  
16 information in order to be successful to move  
17 things through the process.

18 So any other questions from the  
19 Board? Jean.

20 MEMBER RICHARDSON: So Melissa, we  
21 on the Board, and also members of the public,  
22 can get frustrated when the NOSB may have

1 passed a recommendation like animal welfare or  
2 whatever it might be, or the aquaculture  
3 proposed standards, and it just seems to take  
4 like, you know, a hundred years for stuff to  
5 get done, so to speak. We understand, and  
6 have done from our training and from this too,  
7 is that there are all these steps to take.

8 Does it make any difference if we  
9 keep saying, well, you know, where is this  
10 thing, Melissa. You know, why isn't -- what  
11 stage -- where is it on this line. And we  
12 know you have many priorities that you have to  
13 set. How do you decide that you're going to  
14 spend more time on animal welfare or on  
15 aquaculture when we would like to see all of  
16 them done, of course, right away?

17 DR. BAILEY: Yes, that's a good  
18 question. Yes, our -- so back in this last  
19 summer, we had to propose a fairly lengthy  
20 memo about what our regulatory priorities were  
21 going to be. Naturally, to the top of that  
22 list at the time would have been any Sunset

1 rules.

2 For a long time, we were trying to  
3 chip away at some of these other practice  
4 standards, but at the end of the day we had to  
5 get Sunset regulations done because of the  
6 time crunch that we were under. So those  
7 would just naturally rise to the top of the  
8 list.

9 At times, there's been -- I know  
10 people probably recall with methionine, there  
11 was an expiration date. At one point, there  
12 was a tetracycline expiration date. Those,  
13 again, took precedence because of the time  
14 crunch that we were under, and, you know, had  
15 difficulty working on those projects.

16 So I think it's always helpful to  
17 hear from the community about what the  
18 priorities are. It doesn't necessarily always  
19 mean they're going to be able to move faster,  
20 but it helps guide our own sort of internal  
21 process and discussing with people up the line  
22 how important things are to get through,

1 especially, again, if you're kind of competing  
2 for people's time to get things cleared.

3 So I would say yes, it's helpful;  
4 unfortunately, sometimes we can't always say  
5 it's going to be exactly four months, or six  
6 months, so yes.

7 MR. McEVOY: Yes, I think it helps  
8 to continually ask questions of not just the  
9 program, but USDA in general about what the  
10 status is of these various recommendations,  
11 because it shows to the Department the  
12 importance of organics and moving forward with  
13 these recommendations, so.

14 And you can see by the regulatory  
15 work plan, there's a lot of organic items on  
16 that regulatory work plan currently. So  
17 there's a lot of support for organics at USDA.  
18 We are a very small program, but very active  
19 in the regulatory arena and we still have a  
20 lot more work to do, but asking questions is  
21 a good thing to do.

22 Okay. Jay.

1                   MEMBER FELDMAN: Thank you.

2                   Here's a question that goes to the difference  
3                   perhaps between a FACA -- a pure FACA board  
4                   and a FACA board that's also governed by  
5                   enabling legislation, like OFPA.

6                   Do you see that there's any  
7                   difference there in terms of the requirement  
8                   for the agency to commit resources to a board  
9                   such as this Board, which has authorities from  
10                  two different statutes, in which this Board,  
11                  in collaboration with the program and the  
12                  public, is seeking to grow organic, invest in  
13                  integrity and essentially respond to petitions  
14                  as they come in? Are those unique sort of  
15                  functions and mandates that come from the  
16                  enabling legislation? Are those mandates  
17                  somehow -- do they create sort of a  
18                  requirement on the program to commit  
19                  additional resources as they come in -- and  
20                  we're glad to see additional resources having  
21                  come in through the Farm Bill -- to ensure  
22                  that we're being more responsive, not less?

1                   Because what it sounds like is  
2                   happening here is we're getting a little less  
3                   responsive to the needs as identified by the  
4                   organic community by virtue of some  
5                   prioritization that goes on at the program  
6                   under the FACA authority. I would like to  
7                   tease out a little bit how you feel we're  
8                   complying, or are we in any way different  
9                   under OFPA that really requires us to commit  
10                  more resources than would otherwise be the  
11                  case to respond to the need -- and most of the  
12                  needs we're responding to as a Board are  
13                  growth-oriented.

14                   It's to enhance the market and to  
15                   grow the label, the effect of the label. And  
16                   yet it seems like this focus on the onerous  
17                   nature of the, you know, of moving through the  
18                   rule making is slowing that down, is holding  
19                   back the Board wanting to be responsive to  
20                   what it's hearing from the community.

21                   MR. McEVOY: Okay. So the  
22                   National Organic Standards Board is one of

1 about 160 FACA committees that -- and 140 of  
2 those are statutorily-defined boards, so it's  
3 really not anything different than most of the  
4 FACA committees. Congress appropriates money  
5 to the program for a number of different  
6 items, has not appropriated any specific money  
7 for the National Organic Standards Board.

8 We support the -- the Board is  
9 supported by a budget, I think it's \$200,000  
10 a year, which does not actually cover all the  
11 costs of supporting the work of the Board.  
12 That supports the travel, about \$50,000 a  
13 meeting for travel expenses. It supports the  
14 staff, Michelle Arsenault, and -- but there's  
15 a lot of other work, additional work that  
16 happens at the program and Departmental level  
17 to support the Board. So it's a lot more than  
18 \$200,000 a year that we're investing to  
19 support the Board.

20 We've put significantly more  
21 resources into supporting the work of the  
22 Board over the last few years. The reason for

1 us to explain this regulatory process is  
2 because we've heard a lot of frustration from  
3 folks of how come it takes so long and why  
4 does it take so long, why can't we implement  
5 all these NOSB recommendations?

6 One, they're complicated. They  
7 require a lot of review, the process is long  
8 for any rule making that the agency or USDA  
9 does, so we're just explaining what that  
10 process is so there's a better understanding,  
11 so we can move things through as effectively  
12 as possible.

13 The other thing you see is that  
14 USDA is putting a lot of resources in  
15 supporting that pipeline of organic actions.  
16 So over the last few years there's been many  
17 rule making actions that have been supported  
18 by high levels within the Department, and that  
19 continues to be there, that support for lots  
20 of actions to occur.

21 Okay. I think we're going to move  
22 on to everybody's favorite topic, Sunset

1 revision. So with that I'm going to turn it  
2 over to Dr. Brines.

3 DR. BRINES: All right. Thanks,  
4 Miles. Actually, I think that's a good  
5 transition into talking about the Sunset  
6 review process, because certainly as we looked  
7 over the past several years at where we're  
8 spending our rule making time, a lot of that  
9 has been on Sunset rules.

10 And for removing things, we  
11 definitely have to go through the rule making  
12 process, but in looking at how we can  
13 implement other Board recommendations, you  
14 know, that's what instigated our looking into  
15 this process, is can we spend plus time on  
16 some of these things that aren't serving the  
17 process.

18 Okay. So just a general overview.  
19 In September, as you know, the National  
20 Organic Program announced a transparent and  
21 streamlined Sunset review and renewal process.  
22 So that announcement was published in the

1 Federal Register and as well went out through  
2 our electronic newsletter. The purpose of the  
3 updated procedure is to clarify the process,  
4 provide increased opportunity for public  
5 comment, and ensure that a decisive majority  
6 vote happens for all recommendations to change  
7 the National List, and that's whether those  
8 changes are from the petition process or from  
9 Sunset.

10 Okay. So why did Sunset need a  
11 revamp? We had noted a number of draw backs  
12 to the previous process. Each Sunset year  
13 required three separate rule making documents.  
14 So Melissa talked about proposed and final  
15 rules. Under the previous Sunset process, we  
16 were also publishing an advanced notice of  
17 proposed rule making. And a lot of the work  
18 that we were doing on our end was in trying to  
19 move those documents through the clearance  
20 process. It was taking a lot of time and  
21 deferring work on other important priorities  
22 of the Board in implementing those

1 recommendations.

2 In addition, substances were  
3 discussed at a single public meeting, and  
4 removal of a substance under Sunset review  
5 could occur with a minority of votes. So with  
6 the way that the votes -- the voting motions  
7 were previously structured, it could take less  
8 than a majority to remove a substance from the  
9 National List and change the regulations.

10 In addition, we had had some  
11 difficulty implementing annotation changes  
12 that were made during the previous Sunset  
13 reviews. Again, because we're under time  
14 constraints in getting things cleared, having  
15 these discussed at a single public meeting was  
16 becoming problematic to meet our Sunset  
17 deadlines if we didn't have all of the  
18 information we needed.

19 Okay. So in looking at how we  
20 might revamp the process, we go back first to  
21 the statute, in the Sunset provision of OFPA.  
22 And I think Miles had a version of this slide

1 earlier today. And again, what OFPA says is  
2 that no exemption or prohibition contained on  
3 the National List shall be valid unless the  
4 NOSB has reviewed such exemption or  
5 prohibition within five years, and the  
6 Secretary has renewed such exemption or  
7 prohibition. So it clearly distinguishes  
8 between the responsibilities of the Board to  
9 review, and the Secretary to renew.

10 Okay. So through the new process  
11 -- and I'll get into the logistics of the  
12 process a little bit later -- but the overall  
13 benefits are the thorough and transparent  
14 review process for all substances over two  
15 Board meetings. So two public comment  
16 opportunities over which the Board completes  
17 its review of each substance.

18 It also ensures that any change to  
19 the National List, whether, again, that's  
20 through the petition process or during Sunset  
21 review, is supported by a decisive majority of  
22 the Board. And it's decisive as defined under

1 OFPA, which is two-thirds.

2 It also streamlines, again, our  
3 administration of the National List by rule  
4 making. Again, we have to do rule making for  
5 any removals, but if the material remains on  
6 the list, that's not something that's required  
7 by OFPA.

8 Okay. So there's been some  
9 questions about whether this change will  
10 weaken the standards, and no, we don't think  
11 it will. The Board still retains its ability  
12 to recommend removal of substances on the  
13 National List through the Sunset process. So  
14 previously, we did look at other materials  
15 that have come off the list through the Sunset  
16 process, and what we found is when new  
17 information became available or alternatives,  
18 that those substances that were removed from  
19 the National List during the Sunset process  
20 had at least two-thirds votes in favor of  
21 their removal. So even under this new  
22 process, if we were to look at those older

1 substances, they still would have been  
2 removed. Generally, those removals are  
3 well-supported by the Board.

4 So again, just a couple of  
5 examples recently, sulfur dioxide for rodent  
6 control, some forms of pectin and forms of  
7 lecithin that were removed from use, silicon  
8 dioxide, some forms of that, and hops. So  
9 again, generally when things come off the  
10 board through Sunset, they had been previously  
11 supported by the majority of the Board  
12 members.

13 Okay. So what is the process? So  
14 again, just like in OFPA, there's two  
15 components. There's the Board's part to  
16 review and there's the USDA action to renew  
17 for those that are continuing on. So I'll go  
18 through each of these steps and a couple of  
19 the key documents that are associated with the  
20 review.

21 Okay. So in terms of the  
22 mechanics, and I'll use Sunset 2015, since

1 it's on the agenda for this meeting just as an  
2 example, as we go through the steps. So step  
3 one is the meeting announcement in the Federal  
4 Register inviting comment on the Sunset list,  
5 so for Sunset 2015 that's inviting comments at  
6 this meeting. That background information may  
7 include any request from the subcommittee  
8 about any additional information that they're  
9 looking for. So again, that's published in  
10 advance. It includes a summary of the status  
11 of the substance it's listing and its Sunset  
12 date.

13 So step two is written public  
14 comment. So these are the comments that were  
15 submitted in advance of this meeting for  
16 Sunset 2015, and that includes all the written  
17 comment that was submitted by the comment  
18 deadline. Next, we're -- and this is where  
19 we're currently at for Sunset 2015 is step  
20 three, the first Board meeting. So at this  
21 meeting for the crop -- part of the crops  
22 agenda and the handling agenda, there's a

1 section designated for the Sunset substances.

2 So during that section of the  
3 agenda, the subcommittees will summarize the  
4 background information on those Sunset  
5 substances, any public comment received. They  
6 may receive additional in person public  
7 comment at this meeting, and there'll be  
8 deliberations about the need for the  
9 substance. So we're expecting to have a  
10 thorough discussion about the comments that  
11 have come in for those Sunset substances at  
12 this meeting in anticipation of any proposed  
13 removals that might happen later on.

14 Okay. So what happens after this  
15 meeting? The subcommittees will be go back to  
16 their committees and will prepare a document  
17 which is called the preliminary review. So  
18 that preliminary review may include any  
19 motions for removal based on that information  
20 and deliberation that happens at this meeting  
21 for Sunset 2015. So just like a petition  
22 would have a proposal from the subcommittee,

1 in this case we're having a preliminary review  
2 document that'll come out of the subcommittee.  
3 And again, if there's any information about  
4 substances that may need to be removed from  
5 the National List because they no longer meet  
6 the OFPA criteria, that would be included in  
7 a preliminary review for public comment.

8 Okay. So we will publish that  
9 preliminary review for public comment in  
10 advance of the second meeting, which will  
11 happen this fall. When the public comment  
12 period closes prior to the meeting, the  
13 subcommittee will analyze any written public  
14 comments that were submitted on the  
15 preliminary review before the fall meeting  
16 occurs. And then at the next fall meeting,  
17 the subcommittees will present their  
18 preliminary review just like they present any  
19 other proposal, receive public comment at the  
20 meeting, discuss any written public comments  
21 that were received in response to the proposal  
22 prior to the meeting, and then they will vote

1 on any motions for removal that were included  
2 in the preliminary review. And after that  
3 meeting concludes, the Board will complete a  
4 document called the Sunset Review.

5 So that would complete the Board's  
6 responsibility. AMS would receive that Sunset  
7 review document, and we have a template  
8 available that the Board will use for that,  
9 and consider rule making action for any  
10 recommended removals. And then we would have  
11 to go through the rule making process for  
12 removals. For any renewals under the Sunset  
13 provision, we would issue a Federal Register  
14 notice that would announce the renewal of any  
15 substances under the Sunset review.

16 So we see a lot of advantages to  
17 this two-meeting process. One is it allows  
18 for earlier information gathering at the first  
19 meeting, so this is the opportunity for  
20 comments to come in on those Sunset substances  
21 so that the Board has time to consider them  
22 before making any proposals to remove at the

1 second meeting. At the second meeting, it  
2 would allow for the Board to consider any  
3 comments on the proposed removals based on  
4 information received during the first meeting.  
5 So the process is over two meetings and it's  
6 the full Board having that deliberation at  
7 each of those meetings.

8 If new information is submitted  
9 late at the last minute that may have merit,  
10 you know, there's always an opportunity for  
11 new information to come in, but we really  
12 think that new information submitting at the  
13 last minute should be gone through the  
14 petition process. Really, we're trying to  
15 have the information submitted for Sunset  
16 review at the first meeting to ensure that we  
17 can meet any deadlines under the Sunset review  
18 before the Sunset deadline for each substance.

19 Okay. As I mentioned, the new  
20 process does have a different voting procedure  
21 as well. Instead of voting to relist  
22 substances, the Board will be proposing to

1 remove a substance during the Sunset review,  
2 and that removal motion will need a two-thirds  
3 majority as a decisive vote under OFPA. And  
4 the reason that we made this decision was to  
5 align the number of votes required with other  
6 actions that the Board recommends. So  
7 including petitions to remove or petitions to  
8 list, the Board is making a decision to --  
9 that's going to have a net effect, if  
10 implemented, of changing the regulations and  
11 that recommendation needs to be supported by  
12 a decisive majority of the Board.

13 We also understand that because  
14 the Board will only be voting on those  
15 removals, it will increase efficiency a bit at  
16 the Board meetings. But really focusing the  
17 deliberation on any of those proposals to  
18 remove. So we're expecting, you know, a  
19 robust discussion rather than needing to vote  
20 on every individual listing.

21 Okay. So there's been some  
22 questions about how does the Board complete

1 its Sunset review for the Sunset substances --  
2 for ones that the Board is not recommending to  
3 remove, how do you know the review has been  
4 completed if there's no vote?

5           So for removals, it's simple in  
6 that there would be a vote at the second  
7 meeting that -- and if that vote passes by  
8 two-thirds, then that would be recommended for  
9 removal under Sunset and that recommendation  
10 would be passed on to the NOP. For other  
11 reviews where removal is not being  
12 recommended, the review is complete at the end  
13 of the second meeting.

14           So we've defined the process. The  
15 process occurs over two meetings. The  
16 conclusion of that second meeting, if there's  
17 no removal motion, the Board has completed its  
18 obligation under OFPA to review. So at the  
19 conclusion of the second meeting, the Chair  
20 will submit the NOSB-reviewed document to NOP.  
21 Again, recommendations are not required for  
22 Sunset renewals, only for removals, and that

1 structure of the two-meeting process meets  
2 OFFPA's Sunset requirement for the NOSB to  
3 review materials.

4           Okay. So just a quick couple of  
5 other notes on time lines. So in January, we  
6 did publish a memo to the Board on Sunset  
7 review time lines, which identifies the two  
8 meetings that the Board will use to address  
9 each substance for the next couple of Sunset  
10 reviews. It also includes deadlines for the  
11 Board to request technical reports. We  
12 understand since the information will be  
13 occurring over two meetings, we want to make  
14 sure that technical information is available  
15 to the public as early as possible. So we did  
16 put in deadlines that we should be able to  
17 work with with contracting to get those  
18 available in time. And the review also  
19 includes a list of substances scheduled to  
20 Sunset 3/20/17. So that's meetings through  
21 2017, so Sunset dates through 2019 currently.

22           And just one other note about

1       Sunset dates.  If they aren't in the notice,  
2       we do have a list of Sunset dates which is  
3       published in our program handbook on our  
4       website.  The dates for the Sunset are set  
5       five years from the effective date of when the  
6       substance was added to the list.  So for  
7       efficiency, we conduct the Sunset reviews by  
8       calendar year, but there's different dates  
9       depending on the substance.  So sometimes  
10      there's multiple dates within a full Sunset  
11      year.

12                    Right.  So just, I guess in  
13      conclusion, the intent of the new process is  
14      to ensure that there's a decisive majority  
15      vote for all recommendations to change the  
16      National List.  It does maintain the Board's  
17      responsibility to review the substances on the  
18      National List and under the Sunset provision,  
19      and it streamlines our administration of the  
20      renewal process.  It allows us to focus  
21      additional resources in implementing other  
22      important Board recommendations on standards

1 as well. All right. Thank you.

2 CHAIR STONE: Okay. Thank you,  
3 Lisa.

4 Are there questions from the Board  
5 clarifying from Lisa, or for -- or Miles?  
6 Jean.

7 MEMBER RICHARDSON: Lisa,  
8 obviously I'm new to the -- I've been going  
9 through these Sunset materials, and I started  
10 on half a dozen of them that were during -- in  
11 livestock, and I was really quite astounded to  
12 see how difficult it was in terms of public  
13 transparency to actually follow the thought  
14 processes and the materials that were used to  
15 come to decisions on Sunset, to, you know,  
16 keep them or not. Then it's quite, sort of a  
17 rabbit warren to go through to find all of  
18 these materials.

19 So I would like you to explain, if  
20 you would, how it is that we've been working  
21 together, the NOP and the Board, to try to  
22 develop these templates that will allow there

1 to be a public record that will give greater  
2 transparency. Because I know I've had  
3 questions from the public is that what -- can  
4 they see what we're doing and how we're doing  
5 it, and, you know, how we've been developing  
6 materials, how will the public be able to see  
7 those. You know what I mean, those templates?

8 DR. BRINES: Sure. Yes, I mean,  
9 what we publish in advance of this meeting for  
10 Sunset 2015 is basically a table of the  
11 substances, which included reference to where  
12 it is on the National List, links to previous  
13 technical reports, sometimes there are  
14 several, depending on how long a substance has  
15 been on the list, as well as generally links  
16 to the Federal Register notice that added the  
17 substance to the list. So that document often  
18 includes any discussion of comment we might  
19 have received through the rule making process,  
20 which can be helpful as well.

21 MR. McEVOY: Yes, I think what our  
22 goal is, as you mentioned, Jean, is that the

1 previous Sunset processes, it's hard to follow  
2 the documents from the past. And what we're  
3 trying to do is be as transparent as possible.  
4 There's still more, additional information  
5 that will be part of this process to make that  
6 as transparent and available to the public as  
7 possible as we continue to implement this  
8 Sunset process.

9 CHAIR STONE: Jay?

10 MEMBER FELDMAN: In the interest  
11 of, you know, sort of carrying out the laws as  
12 I think we all agree, it's supposed to be --  
13 you know, we want to have a robust discussion  
14 with all points of view on the table. So I  
15 think partly what I'd like to see happen here  
16 in this segment is get some real clarity on  
17 the points of view that are out there in  
18 implementation, starting with this concept of  
19 majority and minority.

20 Miles, you have said that the  
21 minority shouldn't stop a material from being  
22 relisted, or should not allow a material to be

1 delisted, either way you want to think about  
2 it. And in fact, whether you're talking about  
3 Robert's Rules of Order, in which the most  
4 important votes required are two-thirds, or if  
5 you're talking about the historic application  
6 of OFPA with a decisive vote for relisting.  
7 The whole purpose of the minority having  
8 considerable control, that is six members of  
9 this Board, is so that we force, as close as  
10 possible, some consensus among Board members  
11 because these are critical decisions.

12           And if we lose the trust of any  
13 one of the stakeholder groups, be it consumers  
14 or environmentalists or farmers, if we lost  
15 that, that what you're referring to as a  
16 minority, then we really risk the credibility  
17 and the trust in the label. If consumers walk  
18 away from this family or this community or  
19 this market, then we have nothing. We're left  
20 with nothing.

21           So the way Congress envisioned  
22 this was to give tremendous power to the

1 minority to force a discussion and to move  
2 toward consensus. And that's historically  
3 exactly what this Board has done. No one is  
4 perfectly happy with every decision typically,  
5 but it drives us toward that consensus. And,  
6 in fact, that's what Robert's Rules of Order  
7 tries to do as well.

8           So I think it's really a mistake  
9 to keep diminishing the role of the minority  
10 in the context of reviewing the allowable  
11 materials, the National List materials.  
12 That's one that I really think we should have  
13 a discussion as a Board on that point so that  
14 -- with the community so that people  
15 understand that that's a basic, important,  
16 critical philosophical shift and shift in  
17 interpretation of law.

18           The second point is that you --  
19 the only document we really have that's  
20 official is a Federal Register notice of  
21 September 16th, right, of last year, 2013.  
22 And in that document it's very clear that only

1 if warranted, and I'm quoting, the NOSB  
2 subcommittees can develop proposals to remove  
3 substances as part of their preliminary  
4 review. And then each subcommittee chair  
5 leads the full NOSB discussion on the  
6 subcommittee preliminary reviews and any  
7 associated proposals to remove substances from  
8 the National List. And then finally, if a  
9 subcommittee had published a proposal to  
10 remove a substance, then a member of the NOSB  
11 can make a motion to remove the substance from  
12 the National List.

13 I understand your interpretation  
14 of that, and that you may have an  
15 interpretation that allows for a full board  
16 discussion, but there's nothing required in  
17 that September 16 Federal Register to remove  
18 anything other than a delisting motion on to  
19 the full Board, which means you're vesting  
20 with the subcommittee authorities that really  
21 are only vested with the NOSB, the full NOSB.

22 So we either have to correct that

1 September 16 Federal Register notice. I don't  
2 think clarifying it is -- to your intent,  
3 would be sufficient, and if you want to walk  
4 us through that language and explain how if a  
5 subcommittee does not pass a motion to delist,  
6 how, based on this Federal Register notice,  
7 that motion -- that is, a motion for  
8 essentially an allowance for relisting based  
9 on a review -- will come to the full Board for  
10 deliberation and a vote.

11 Okay. So I think we need clarity  
12 on that. And if, in fact, you see this  
13 differently than as we've interpreted the  
14 words on the page, that would be helpful to  
15 hear at this juncture.

16 So, you know, at the end of the  
17 day here, we're talking -- as I said earlier,  
18 we're talking about public trust in this  
19 process. You know, streamlining is  
20 streamlining, but if we're streamlining at the  
21 expense of public trust in the label at the  
22 end of the day, then we haven't achieved

1 anything except streamlining for purposes of  
2 avoiding an otherwise onerous regulatory  
3 process. So you may have achieved an end that  
4 you think is important, and is important, I'm  
5 not denying it, but at the expense of what?  
6 At the expense of public trust and value of  
7 that label.

8           So as a Board member, I feel that  
9 this Board has to help strike that balance and  
10 has to work in collaboration with the program  
11 to give you the feedback -- or the program the  
12 feedback that it needs to make sure that we  
13 don't alienate major stakeholder groups in the  
14 organic community that in and of themselves  
15 may -- you may call a minority, but if they  
16 walk away from the table, we're left with  
17 virtually nothing.

18           So I hope we can, throughout these  
19 next several days, can come to an  
20 understanding about those perspectives and see  
21 if we can reincorporate somehow those elements  
22 into the implementation of the statute, which

1 is carefully calibrated to ensure that we all  
2 do work together and hear each other. Thanks.

3 MR. McEVOY: Okay Jay, you said a  
4 lot of things there.

5 (Applause.)

6 MR. McEVOY: And there were many  
7 things there that I totally support. The idea  
8 of consensus, clear process. So a couple of  
9 things is-- one is, as we said, the NOSB is  
10 responsible for renewing these substances  
11 every five years as part of the Sunset review,  
12 and that's what the process lays out, is that  
13 process.

14 There are no decisions that are  
15 made at a subcommittee level. The  
16 subcommittee has a role to play on all kinds  
17 of things with the Board, but the place where  
18 those decisions, where the review is  
19 completed, is at the full Board meetings. So  
20 it sounds like there's some questions, but the  
21 process is, is that the subcommittee reviews  
22 things, brings proposals to the full Board,

1 but the full Board is the one that has the  
2 discussion and the final determination.

3 So thank you for your perspective,  
4 and are there questions?

5 CHAIR STONE: So Jay, and to  
6 Jean's point, you know, with this new process,  
7 we're developing these templates and charts  
8 and tracking mechanisms, and so some of this  
9 is just finalizing the mechanics of how it  
10 works through the system, but for that very  
11 reason, it's not necessary for Federal  
12 Register notice I guess, but we're still  
13 working through the mechanics.

14 And my conversation with  
15 individual Board members is yes, there's an  
16 assumption that every material will come  
17 before the full Board in some form or fashion.  
18 We're just not sure what that physically looks  
19 like in the process of making these lists of  
20 hundreds of materials, and the review going --  
21 leading up to that.

22 Any -- Francis.

1                   MEMBER THICKE:  So Miles, then, in  
2                   the case of a subcommittee that does not put  
3                   forth a proposal to deny or to delist, how  
4                   does the Board technically review that, the  
5                   full Board review that proposal -- or that  
6                   material?

7                   MR. McEVOY:  So the subcommittees  
8                   do not have to put forward a proposal to  
9                   remove.  In discussions with you all, it  
10                  sounds like you really want to vote on things,  
11                  that you want to vote on every Sunset  
12                  material.  So if the subcommittees, if the  
13                  Board wants to have a proposal on the table  
14                  for removal for every substance, you can do  
15                  that.

16                  The proposal to remove should be  
17                  based on the criteria in OFPA.  There should  
18                  be some basis for a proposal to remove.  But  
19                  to have just something on the table so there  
20                  can always be a full Board discussion, a  
21                  proposal to remove, even though the  
22                  subcommittee members may not support that

1 proposal to remove, it could still be on the  
2 table for discussion for full review.

3 So that's where the full Board  
4 then could make that determination, that vote,  
5 on whether or not to remove that substance.  
6 To vote to remove the substance should be  
7 based on the OFPA criteria of determining how  
8 a substance fails to meet one of those seven  
9 criteria.

10 CHAIR STONE: Nick.

11 MEMBER MARAVELL: So if a Board  
12 member who's not on the subcommittee feels  
13 that a material fails to meet the OFPA  
14 criteria, that Board member would not have the  
15 opportunity to realize a discussion and a vote  
16 on that substance, if a subcommittee did not  
17 make a recommendation to delist, is that --  
18 did I misunderstand it, or is --

19 MR. McEVOY: Yes, I think you  
20 misunderstood it.

21 MEMBER MARAVELL: Oh, good.

22 MR. McEVOY: You have two --

1                   MEMBER MARAVELL: Please explain.

2                   MR. MCEVOY: -- you have two  
3 meetings, right. So you have the first  
4 meeting to discuss the public comment, the  
5 technical reports, all the background  
6 information, why it got onto the National List  
7 in the first place, right. So that's the  
8 purpose of the first meeting.

9                   There's going to be a full  
10 discussion of all the Sunset materials, one by  
11 one. That information will go back to the  
12 subcommittees. There can be any member of the  
13 Board that can raise concerns about a  
14 particular Sunset material during the full  
15 Board discussion. If the subcommittee can,  
16 they always have a proposal on the table to  
17 remove, so you always, at the full Board  
18 meeting, have the ability to vote and  
19 determine the criteria. That's what's the  
20 responsibility of the full Board is.

21                   The subcommittee is simply  
22 focusing, just like with all your -- you know,

1 all the petitioned substances, the other  
2 things that are on the NOSB work plan, the  
3 subcommittees put a little more focus on the  
4 things that are on their work plan and then  
5 put proposals forward to the full Board for  
6 consideration.

7 CHAIR STONE: Colehour.

8 MEMBER BONDERA: Thank you. I  
9 guess as a follow-up to Nick's question and  
10 your response, Miles, I just need to better  
11 understand the choice of the words "can" and  
12 "could" in terms of, the subcommittee chairs  
13 could make those choices to put such a thing  
14 forth, but like Nick suggested, if nobody on  
15 the subcommittee is encouraging it, they could  
16 choose not to.

17 So I guess I'm asking, will this  
18 be an NOP requirement or this is just a  
19 possible guidance? I just -- I don't get how  
20 this is going to play out in reality.

21 MR. McEVOY: Right. Well, you  
22 have to remember that the responsibility that

1 the Board has during Sunset is to review the  
2 substances. There's no requirement that you  
3 have a vote to remove. So it's your option if  
4 you want to have that on the table. Your only  
5 requirement is to review these substances  
6 every five years. So that's why it's a "may",  
7 you may put that proposal on the table to  
8 remove, but it's not a requirement to have a  
9 proposal on the table to remove these  
10 substances.

11 CHAIR STONE: Jean.

12 MEMBER RICHARDSON: There's  
13 obviously a lack of clarity, and yesterday at  
14 the NOC meeting that I attended for a short  
15 period of time, these same questions were  
16 raised by a range of stakeholders around the  
17 table. And we all understand that the present  
18 NOP staff, Lisa, Melissa, Miles sitting here,  
19 it is your intent that all of these materials  
20 come to the full Board.

21 The trouble is, the Federal  
22 Register seems to lack the necessary clarity,

1 and I'm not sure whether we can answer it here  
2 around the table right now, but somehow or  
3 other we have to have, in writing, this intent  
4 so that there is -- there are reassurances, as  
5 Jay put, for the sort of, the integrity of the  
6 whole process.

7 And I -- you know, we trust that  
8 you're doing the right things, but if there's  
9 a lack of clarity on a very serious issue like  
10 this, which is seen by a large number of  
11 stakeholders as being a problem, I think that  
12 we need to put our heads together and work out  
13 how we can provide that necessary clarity and  
14 reassurance.

15 CHAIR STONE: Zea.

16 MEMBER SONNABEND: Okay. As  
17 subcommittee chair of the crops committee, if  
18 I interpret what I think I heard Miles say  
19 correctly, we have substances for Sunset  
20 review and this is the first meeting we'll  
21 talk about them. Any Board member who wishes  
22 to raise concerns during our discussion

1 tomorrow, whether they're on the subcommittee  
2 or not, can encourage us on the subcommittee  
3 to come forward with a proposal to remove for  
4 the next meeting.

5 So if you read the public comment  
6 as I did, we all read the public comment and  
7 some commenters say, well, this should be  
8 removed for this reason, all any member of the  
9 Board has to do is say, during our discussion,  
10 these concerns are raised, I think we should  
11 consider removal, then the subcommittee will  
12 take it and work on it for the next meeting  
13 and possibly bring -- probably -- you know, I  
14 would respect the process as chair to bring  
15 forward the motion for removal.

16 DR. BAILEY: Jean, to just follow  
17 up on your comments. Just to be clear in the  
18 notice, and I'm not sure if people are missing  
19 this or not, but the preliminary review -- so  
20 we're in the first meeting right now. All of  
21 the substances for Sunset 2015 will be  
22 discussed at this meeting.

1                   Those same substances, in the  
2                   fall, regardless of whether there's a proposal  
3                   to remove, will again be part of the  
4                   preliminary review that the subcommittee puts  
5                   forth and will, again, all be discussed by the  
6                   full Board at the second meeting. So there is  
7                   consistency between the first and second  
8                   meeting that all of those individual materials  
9                   will have an opportunity to be discussed,  
10                  whether it's findings of just the review or  
11                  putting actually on the floor a proposal to  
12                  remove at the second meeting.

13                         So I'm sort of hearing -- what I  
14                         think I'm hearing is concern that some  
15                         materials won't even be discussed at the  
16                         second meeting, and that's just not the case.

17                                 CHAIR STONE: And we're  
18                                 pre-loading time for all of this. We're  
19                                 starting way ahead and 16 and 17 is right  
20                                 here in front of us.

21   So Jay, if you'll wrap this up?

22   MEMBER FELDMAN: Yes, I'll try.

1     Melissa, that's an interesting interpretation,  
2     but it really -- when you publish a Federal  
3     Register notice that says if a subcommittee  
4     had published a proposal to remove a  
5     substance, then a member of the NOSB can make  
6     a motion to remove, that precludes a member,  
7     such as the Honorable Member from Maryland has  
8     suggested, if he was not on a subcommittee,  
9     and the probability didn't actually pan out as  
10    the Honorable Member from California  
11    suggested, then we would be lacking a motion  
12    published, made available to the public, and  
13    therefore the introduction of a motion to  
14    delist at that second meeting would be  
15    considered untimely, as referenced in the  
16    Federal Register notice and therefore out of  
17    order.

18                   So what you're describing is fine,  
19    that makes sense, but that is not what is on  
20    the page. So unless you can reinterpret this  
21    for me, if a subcommittee had published a  
22    proposal to remove a substance, then a member

1 of the NOSB can make a motion to remove a  
2 substance from the National List.

3 DR. BAILEY: No, that -- well, I  
4 wasn't actually commenting on that portion of  
5 the notice. I mean, that's fine, what you  
6 just said. I was just saying that what I was  
7 hearing was that people were concerned some of  
8 these materials would not even be discussed at  
9 the second meeting, and I was clarifying that  
10 the notice is clear on that point, that all of  
11 those materials will, in fact, be discussed at  
12 the second meeting.

13 MEMBER FELDMAN: Right. But  
14 discussion without the ability to vote for a  
15 delisting motion, given all the hypotheticals  
16 of probability, may or can, these are not  
17 words in either regulatory or statutory  
18 language that ensure that the full Board  
19 becomes a deliberative process that allows for  
20 a delisting motion. And that's key.

21 You know, when I first got on the  
22 Board, Miles explained to me and the other new

1 members that the Board lacking an action on a  
2 Sunset meant that the material would be  
3 delisted. And that meant that we had to  
4 really get ourselves in gear to take action to  
5 prevent a delisting, because a lack of action  
6 resulted in a delisting.

7 Now we're being told a lack of  
8 action results in a relisting, and some of us  
9 obviously believe there's a legal question  
10 there. But leave that aside. If this, from  
11 a FACA perspective, doesn't allow for full  
12 deliberations and a vote for delisting, then  
13 I think we have a FACA problem in terms of the  
14 Board not having the ability to vote when a  
15 member of the Board wants to raise a motion  
16 that had not been passed out of subcommittee.  
17 So that's a FACA problem.

18 MR. McEVOY: Yes, I would just  
19 respectfully disagree that -- what your  
20 responsibility is, is to review these  
21 substances. There's no requirement that  
22 there's a vote on the table to remove these

1 substances. And -- but you have lots of  
2 options to do that, and that's what this  
3 meeting is about is to discuss these  
4 substances. If you want a proposal to remove,  
5 get it into the record, it'll become part of  
6 the proposal, then it can be part of the next  
7 meeting so you can have a vote on removing  
8 these substances. So yes, that's it.

9 CHAIR STONE: So Jay, it is  
10 incumbent on us to be out in front at this  
11 first meeting when they're first announced,  
12 make sure the members of the public are aware  
13 that they're -- it's in the first meeting, et  
14 cetera, to not wait for that second meeting.  
15 So it's a little tougher on us to stay in  
16 front of these things to avoid the concern  
17 that you have.

18 With that, it's twelve -- oh,  
19 Calvin.

20 SECRETARY WALKER: I have some  
21 comments and questions. It's my view, looking  
22 at the new change, is that it seems like I'm

1 not hearing that -- I was under the impression  
2 that all materials will be voted on by the  
3 Board, whether at the first or the second  
4 meeting. Is that -- will the Board as a whole  
5 get a chance to vote on every material for  
6 Sunset?

7 MR. McEVOY: The Board reviews  
8 each -- every material during Sunset. Your  
9 responsibility is to review these substances.  
10 You can have a proposal to remove every  
11 substance if you would like, but it's not a  
12 requirement. Your responsibility is to review  
13 each of these substances every five years.

14 SECRETARY WALKER: And that's the  
15 rub that I have. It seemed like this Board  
16 ought to have the opportunity all to vote on  
17 all materials up for Sunset, up or down, as  
18 opposed to they might or might not.

19 The other issue I have is that in  
20 the livestock committee I have about seven  
21 materials that I'm looking at. We look at new  
22 information. Some of the materials I'm

1 looking at do not even have a TR. Some do not  
2 even have had a TR in 1999.

3 When you're dealing with science,  
4 new information, a TR that has been done in  
5 1999, that's 15 years, that's a long time.  
6 And if the program do not have enough funds to  
7 get new TRs for these, I think the one I have  
8 I think 60 percent have not had a TR since  
9 1999. So how do I, as a Board member, if the  
10 funds are not there, to actually get new TR to  
11 see if there's new information to keep in or  
12 vote out?

13 DR. BRINES: Yeah, I can answer  
14 that for you, Calvin. I think those materials  
15 you're referring to might be part of the 2017  
16 Sunset review of which there are over 200  
17 materials. Many of those materials were added  
18 to the National List as part of the  
19 regulations going into had technical advisory  
20 panel reviews that were effect.

21 So they might have conducted in  
22 1995 or 1996, but may not have a lot of new

1 information, technical information that's  
2 available.

3 We do have some resources to  
4 devote for technical reports for each Sunset  
5 year. It can help the program in terms of  
6 reviewing those requests, that the  
7 subcommittees can look at those materials and  
8 really prioritize which ones are most  
9 important. I think most of the more  
10 controversial materials generally have updated  
11 technical information.

12 The ones that don't are often  
13 materials that have a long history of use in  
14 organic, even before the NOP regulations went  
15 into effect. There might be new information,  
16 but we probably won't be able to do 200 new  
17 technical reports. You don't have the time to  
18 review them and neither do I. So prioritizing  
19 where the real needs are can be helpful for  
20 us. Thanks.

21 CHAIR STONE: Harold?

22 MEMBER AUSTIN: On the handling

1 committee we're dealing with some of these  
2 issues right now, and I think a good example  
3 is because of the lack of adequate funds to be  
4 able to take and request a TR on virtually  
5 every item, I mean in the 2017 we're going to  
6 have a 105 materials for the handling  
7 committee along. So we've got a quite  
8 extensive list.

9 Part of the new process, they do a  
10 listing for the Sunset materials. I think  
11 this first one -- and we've done that on our  
12 2015 materials, is that it affords the  
13 subcommittee the opportunity to reach out to  
14 the original petitioner, to the stakeholders,  
15 to the certifiers, and come up with specific  
16 questions to help offset some of the requests  
17 or the lack of requests for the TR.

18 So it gives the community an  
19 opportunity, the stakeholders irregardless an  
20 opportunity to comment to that and bring to  
21 light any new changes to that substance to the  
22 subcommittee. So that as we go through our

1       deliberation, headed to the second meeting, if  
2       there's anything that's come up, we can  
3       address it then, and we could then initiate a  
4       motion to delist at that time, depending on  
5       what's been brought to us.

6                   CHAIR STONE:  Thanks.  Calvin, you  
7       want to wrap this up for us?

8                   SECRETARY WALKER:  Yes.  Could the  
9       program share with me -- because I know I have  
10      been asked, and will be asked again, if I'm a  
11      petitioner and I'm petitioning for methionine,  
12      if I'm the petitioner, if I bring this forward  
13      for it to be added to the National List, where  
14      is my role in making the case to remove it?

15                   CHAIR STONE:  Go ahead, Lisa.

16                   DR. BRINES:  Yeah, if I understand  
17      your question, Calvin.  So we only accept  
18      petitions for generic materials.  So once the  
19      generic materials added to the list, any  
20      manufacturer or user of that material can use  
21      the generic form.

22                   Often we get petitions from the

1 manufacturers of specific materials. They may  
2 want to defend the material during the Sunset  
3 review, but really once it's added to the  
4 regulations it's a public -- it's open to  
5 anyone. So I don't know that then that  
6 manufacturer specifically needs to be engaged.

7 CHAIR STONE: I would suggest,  
8 Calvin, that that's what Harold's saying, is  
9 the subcommittee reaches to all of the  
10 interested parties in more of an open  
11 education process about these materials versus  
12 the subcommittee going into deliberations on  
13 their own and seeing -- hopefully we did good  
14 before we make a proposal to the full Board.  
15 So it does involve just a lot of interaction  
16 with the community, which is our  
17 responsibility on each of these materials.

18 Okay. Thank you very much. I'm  
19 sure we'll have some bits and pieces of this  
20 in addition as we go through the next couple  
21 of days. I have 12:40, let's return back at  
22 1:45. That gives us a little over an hour to

1 get out and find lunch and get back. Thank  
2 you very much.

3 (Whereupon, the above-entitled  
4 matter went off the record at 12:40 p.m. and  
5 resumed at 1:49 p.m.)

6 A F T E R N O O N S E S S I O N

7 (1:49 p.m.)

8 CHAIR STONE: If I could have the  
9 Board members take their seats, we're going to  
10 go ahead and get started.

11 (Pause.)

12 CHAIR STONE: We've got a little  
13 bit more of a report from NOP, we're going to  
14 get Mr. Mark Lipson up here, then we're going  
15 to get into public comment, oral comments if  
16 you will. Yeah, and Sarah with NRCS. I'm  
17 sorry, Sarah. I didn't -- wasn't slighting  
18 you. You are part of USDA.

19 So we're -- your agenda shows  
20 there's an hour of time for overarching or  
21 underpinning, I don't remember the exact word  
22 -- overarching ideas and undercurrents in

1 organics.

2 I think we felt some undercurrents  
3 earlier this morning, and we're going to let  
4 that be that time, and we're going -- because  
5 we don't want to get in -- to limit the oral  
6 comment time. So that's a conversation that  
7 we maybe can have bits of pieces of throughout  
8 the agenda, but not take an hour long block of  
9 time just for that.

10 So with that being said, we'll  
11 turn it over to Miles to pick up the NOP  
12 report that we didn't get to before lunch.  
13 Miles?

14 MR. McEVOY: Okay. Welcome back.  
15 This is the normal part of the process where  
16 I talk about a lot of things happening at the  
17 National Organic Program, so we've been busy,  
18 there's a lot of things going on, a lot of  
19 things to report on, things that we've  
20 accomplished and what our plans are for the  
21 immediate future.

22 I guess I have control, so I can

1 do this. Okay. So just as a reminder of the  
2 National Organic Program, our mission, our  
3 vision, our mission is to ensure the integrity  
4 of USDA organic products in the United States  
5 and throughout the world.

6 The USDA Organic logo is  
7 recognized throughout the world as the gold  
8 standard in many, many different countries of  
9 the integrity of the process, the rigor of our  
10 process.

11 It is very much seen that way in  
12 many of the international meetings that we go  
13 to. So it's not just about protecting  
14 integrity here, but it's also protecting  
15 integrity of the products being shipped  
16 overseas and products that come into the US  
17 bearing the USDA Organic logo.

18 Our vision, organic integrity from  
19 farm to table. Consumers trust the organic  
20 label. Had some discussions about trust here  
21 this morning. It's very, very important to  
22 make sure that we maintain that integrity,

1 that the standards are being upheld through  
2 the certification and accreditation process.  
3 And our core role is to implement the Organic  
4 Foods Production Act and the USDA organic  
5 regulations.

6 So I know a lot of you know what  
7 the program does, but there might be things  
8 that we do that you don't know that we do.  
9 And here are the key activities of what the  
10 program does.

11 We develop and maintain organic  
12 standards, and that's where the National  
13 Organic Standards Board is such a critical  
14 role in terms of the public input that we get,  
15 the advice and the recommendations that we get  
16 from the Board are critical in that process of  
17 developing and maintaining the organic  
18 standards.

19 We accredit and oversee the  
20 third-party organic certifying agents, and  
21 they're the ones who do the review and  
22 inspection and approving organic producers and

1 handlers to be in the organic marketplace. So  
2 our oversight of them to ensure that they're  
3 doing their jobs properly is very critical.

4 We implement international organic  
5 trade agreements. We also have an enforcement  
6 role. We investigate complaints of  
7 violations, for example uncertified farmers  
8 selling food as organic, or selling  
9 conventional food as organic. And of course  
10 we support the work of the National Organic  
11 Standards Board.

12 Just some facts and figures.  
13 There's 84 accredited certifying agents that  
14 are operating worldwide, there's over 25,000  
15 certified organic operations, and around \$35  
16 billion in US organic sales.

17 The one thing that's interesting  
18 to think about in terms of the 25,000  
19 certified organic operations is that a number  
20 of those are grower groups, especially --  
21 well, outside the US. And within those grower  
22 groups there are about a half a million small

1 holders, or small farmers that participate in  
2 those growers groups and are participating  
3 under the USDA National Organic Program.

4 A few quick facts about the NOP.  
5 Thirty-four employees in three divisions and  
6 growing. We're in the process of hiring about  
7 10 new staff, so we'll have significantly more  
8 people working in the program a year from now.

9 Our budget was around \$7 million  
10 in 2012. With sequestration it went down to  
11 6.369 in 13, and then we had a sizable  
12 increase for 14. This money was provided in  
13 January, but it takes a long time to get that  
14 money actually to the program and get that  
15 money implemented.

16 So that's -- it's a lot of work  
17 actually to all of a sudden figure out --  
18 well, it's not all of a sudden -- we had a  
19 plan of how to utilize that money, but it's a  
20 lot of work to hire the staff and get the work  
21 done to utilize that money the best.

22 We are a regulatory program within

1 the Agricultural Marketing Service. So that's  
2 our job is to regulate the organic label, the  
3 organic trade, and that's what we do.

4 So, we oversee the work of 84  
5 certifiers, certified over 25,000 operations,  
6 that work of accreditation includes audits,  
7 audit report reviews, we do notices of  
8 non-compliance to certifying agents, we have  
9 to do corrective action reviews of the  
10 corrective actions that they do to correct  
11 their findings, we respond to their questions,  
12 we update the list of certified operations.

13 And just some other facts and  
14 figures. As of the close of fiscal year 2013,  
15 certifiers were in full compliance with 95  
16 percent of the accreditation criteria, and  
17 have implemented corrective actions for all  
18 the deficiencies that we found, all the  
19 findings.

20 So what we do to a certifier is  
21 very similar to what happens with a certified  
22 operation, is that they are inspected, or

1 audited. Those audits usually are about a  
2 week long, depending upon the size and scope  
3 of the certifier, and as with the certified  
4 operation, there's always things that you  
5 find.

6 Most of things are relatively  
7 minor, they don't have all their conflict of  
8 interest reports up-to-date, that they have  
9 been, but they're not up-to-date for all their  
10 employees, they have some missing training  
11 records. For foreign certifiers, one of the  
12 common things we'd found is that they didn't  
13 follow the adverse action procedures exactly  
14 as per the regulations. So those are the  
15 kinds of findings.

16 It's part of the process that you  
17 do have findings when you do audits and that's  
18 -- then we make sure that those certifiers are  
19 making the corrective actions to come back  
20 into full compliance with all the  
21 requirements.

22 So key accreditation activities

1 for last year. There were 25 accreditation  
2 renewals audits, five accreditation mid-term  
3 audits, one initial accreditation audit, 63  
4 reinstatements of certification, nine  
5 temporary variances, we denied two temporary  
6 variances, we issued four expert  
7 authorizations, we supported training, policy  
8 development and outreach activities, we  
9 launched Sound and Sensible Initiative, and  
10 we'll talk more about that later.

11 So, many different things that the  
12 Accreditation Division of the National Organic  
13 Program is doing. They have a - limited  
14 staff who work very closely with the  
15 Agricultural Marketing Service Quality  
16 Assurance Division to do the audits of  
17 certifiers, but there's a lot of work that's  
18 involved in that.

19 In terms of international trade,  
20 we have trade arrangements with several  
21 countries to facilitate the exchange of  
22 organic products and provide market

1 opportunities for organic producers and  
2 handlers in the US. We have three equivalency  
3 arrangements currently.

4 Now an equivalency arrangement is  
5 where we accept the foreign country's program  
6 in total, we accept their standards as  
7 equivalent. It doesn't mean identical, it  
8 means that it's equivalent. We accept their  
9 accreditation system, we accept their  
10 compliance process, how they enforce the  
11 organic label in those countries.

12 So we have three of those  
13 equivalency arrangements: with Canada, which  
14 was the first one in June of 2009; and then  
15 2012 an equivalency arrangement with the  
16 European Union and the 27 member states, so 27  
17 countries involved under the European Union;  
18 and then Japan just most recently, became  
19 effective on January of this year.

20 And we're having discussions with  
21 other countries, in particular South Korea and  
22 Switzerland. Many countries are interested in

1       equivalency arrangements with the US, so  
2       that'll be a continuing focus of the program  
3       is to work with these foreign countries on  
4       potential equivalency arrangements.

5                       Recognition agreements are  
6       distinct in that they are where the -- what  
7       we're accepting is the foreign country's  
8       accreditation system. So we're not accepting  
9       their standards, they still have to certify  
10      products in those countries to the US  
11      standards, but we are accepting the  
12      accreditation program, the government  
13      accreditation program. We have now three  
14      recognition agreements, with India, Israel and  
15      New Zealand.

16                      All of these agreements require  
17      both negotiations and ongoing discussions  
18      through organic working groups, and ongoing  
19      peer assessments, peer reviews where we're  
20      sending teams to those countries to make sure  
21      that they're meeting the terms of the  
22      requirements. And they do the same, they send

1 teams to the US.

2 So we work very closely with  
3 USDA's Foreign Agricultural Service and the  
4 Office of the US Trade Representative on all  
5 this work on international trade and  
6 activities.

7 So just briefly, in terms of  
8 imports there are three ways that products can  
9 get into the US organic market. It can be  
10 certified by a certifier that's directly  
11 accredited by USDA National Organic Program,  
12 or they can be certified to the USDA organic  
13 regulations by a certifier that is accredited  
14 by a foreign government that's recognized by  
15 USDA. That's Israel, India and New Zealand.

16 And finally, it can be certified  
17 to an equivalent organic standard by an  
18 authorized control body. So for instance in  
19 Canada, the Canadian Food Inspection Agency  
20 does the accreditation of the certifiers that  
21 operate in Canada. Those certifiers are  
22 certifying to the Canadian standard.

1                   We deem the Canadian standard  
2                   equivalent to the US standard with a couple of  
3                   critical variances. One is that they -- any  
4                   livestock product coming into the US can't be  
5                   produced with the use of antibiotics, and then  
6                   for products going from the US into Canada  
7                   there are stocking rate requirements for  
8                   poultry and non-ruminant livestock, and  
9                   prohibition on hydroponics and aeroponics and  
10                  sodium nitrate. Almost lost that last one  
11                  there.

12                  Okay. And then so we have to --  
13                  we're responsible to make sure that all  
14                  products sold in the US meet the US  
15                  requirements, but we're also interested in  
16                  supporting markets for US producers and  
17                  handlers. There's a lot of interest in  
18                  organics in many foreign countries. There's  
19                  a lot of foreign countries that organic sales  
20                  are increasing rapidly. China, for instance,  
21                  has a growing organic market.

22                  So, for the countries that we have

1 an equivalency arrangement, the NOP  
2 certification is equivalent and it's  
3 relatively easy to get your products into  
4 those countries, that's the EU, Canada and  
5 Japan. For Taiwan, we have an export  
6 arrangement, so NOP certification is accepted  
7 there.

8           There are many countries that have  
9 no mandatory labeling requirements, so it's  
10 sort of an unregulated marketplace. So Mexico  
11 is like that, though they're in the process of  
12 implementing some regulations there. And  
13 Australia has a mandatory regulation for  
14 exports, but not for domestic. So in those  
15 countries, US organic certification works for  
16 sales.

17           And then there's other countries  
18 that have their own mandatory requirements,  
19 that have their own standard. For instance  
20 China, South Korea now, they've just  
21 implemented mandatory requirements as of  
22 January of 2014 in Brazil. And so for those

1 countries, if you want to ship to those  
2 countries, you have to be certified to that  
3 country's standard by a certifier that's  
4 accredited under that country's standard. So  
5 it gets a lot more complicated. So that's  
6 just a quick overview of export issues.

7 So key priorities for the  
8 Accreditation and International Activities  
9 Division, of course publishing the updated  
10 list of certified operations, that's a thing  
11 that we do on a yearly basis.

12 We're very excited about the money  
13 that we've gotten in the Farm Bill for  
14 information technology upgrades. So - in the  
15 future, we'll have a real time database of  
16 certified operations. But the current time  
17 is, is that we have to do this on an annual  
18 basis, and there's a fair amount of work  
19 involved in doing that.

20 We do certifier training every  
21 year, which we want to expand on that. So the  
22 last one was in February. We train our

1 auditors to make sure they're up to speed with  
2 any changes to the requirements and they're on  
3 the same page as they do their audits of  
4 certifiers.

5 We did our first Latin American  
6 certifier training in March. Had nine or ten  
7 Latin American countries that participated.  
8 They are very, very excited about the  
9 opportunities in organic agriculture in their  
10 countries and how they can support the organic  
11 integrity and understand the organic system in  
12 Latin America. So we hope to continue to  
13 provide training to -- in Latin America in  
14 particular, but other countries potentially as  
15 well.

16 We're currently under a peer  
17 review by the American -- by ANSI, I always  
18 forget what the acronym stands for, but it's  
19 the -- Lynn, you know -- American National  
20 Standards Institute. American National  
21 Standards Institute. Okay. That seems kind  
22 of redundant, American National.

1                   Okay. American National Standards  
2                   Institute. They're currently doing a peer  
3                   review, so they're evaluating the program  
4                   under ISO 17011 in our requirements, and so  
5                   once that review is complete, we'll be  
6                   publishing that peer review report for  
7                   everyone to take a look at.

8                   Lots of accreditation audits.  
9                   This is a heavy accreditation audit year for  
10                  certifiers, and then maintaining our existing  
11                  recognition and equivalency arrangements,  
12                  conducting our peer reviews and working  
13                  groups.

14                  Moving on to the Compliance and  
15                  Enforcement Division, their key activities are  
16                  to investigate complaints, work with  
17                  operations to achieve compliance where  
18                  possible and take enforcement actions as  
19                  appropriate. They represent the National  
20                  Organic Program in appeals of adverse actions.

21                  They work with certifiers and  
22                  state programs and federal partners on

1 enforcement of the statute and the  
2 regulations, so there's a lot of work,  
3 collaborative work that they do with  
4 certifiers to do the investigations of  
5 complaints. And if it gets to be, for  
6 instance, more serious violations, we work  
7 with our federal partners and the Department  
8 of Justice at times on criminal  
9 investigations.

10 They're our lead  
11 enforcement-related policy development  
12 division, and they also are doing some  
13 outreach efforts.

14 So the purposes of enforcement is  
15 to protect the integrity of the organic  
16 standards so as to facilitate commerce,  
17 maintaining consumer confidence, and ensuring  
18 a fair market for the great majority of  
19 operations that operate in compliance with the  
20 law. So our experience shows that the vast  
21 majority of operations are in compliance with  
22 the requirements.

1                   There's always findings when you  
2                   do an audit, when you do an inspection, but  
3                   they tend to be relatively minor things that  
4                   can be corrected. We do find some significant  
5                   violations at times, and then we want to do  
6                   very stringent enforcement and have strict  
7                   penalties for those bad actors. But the great  
8                   majority of organic operations are operating  
9                   in compliance with the requirements.

10                   So in terms of 2013, the  
11                   Compliance and Enforcement Division issued 18  
12                   civil penalties totaling \$78,500 for willful  
13                   violations of the regulations. They closed  
14                   260 complaints. They had continuous  
15                   improvement on case handling and they reduced  
16                   the overall backlog of complaints.

17                   We still have a backlog of  
18                   complaints, but we're making some progress  
19                   there. And they'd worked with the Office of  
20                   Inspector General and the Department of  
21                   Justice on some high profile enforcement  
22                   cases.

1                   We've had a lot of improvement in  
2 terms of handling of appeals. A few years  
3 ago, 2011, the average days to close an appeal  
4 was 344 days, so basically a year. So that's  
5 the average time, was a year. So some appeals  
6 were going on for two years, a very long  
7 period of time.

8                   And remember, if you appeal an  
9 adverse action, the operation continues to be  
10 certified, continues to be able to sell  
11 products as organic during that appeals  
12 process.

13                   So we brought that down from 2011  
14 to -- over the last six months down to 148  
15 days, so we've cut that in half for the  
16 average amount. And it looks like for all of  
17 the appeals that we're getting, that we'll be  
18 able to close the vast majority of those  
19 within 180 days in 2014, which means that  
20 there will be others that are being closed in  
21 like 90 days. So a lot of improvement -- of  
22 process improvements in the way that we handle

1 appeals.

2 One of the things that we're doing  
3 is we're using settlement agreements in many  
4 cases to more rapidly close the appeal, ensure  
5 compliance with the regulations, either get  
6 those companies back in compliance, or get  
7 them out of the organic marketplace.

8 Complete distribution. Over half  
9 of the complaints we get are about uncertified  
10 operations, about a third on labeling  
11 violations and fraud, and prohibited  
12 substances -- allegations of prohibited  
13 substances and methods about -- it looks like  
14 about a sixth or a fifth of the complaints  
15 that we receive.

16 Priorities for warrants and  
17 enforcement. Complaint investigations and  
18 closures remain their highest priority,  
19 reducing the backlog and their time to case  
20 closure. Some things can be closed relatively  
21 quickly, but some things that are complicated  
22 take a significant amount of investigative

1 work to bring to closure.

2 Working closely with the Office of  
3 General Counsel to pursue complaints for  
4 hearing against violators. So after there's  
5 an administrative decision, the next step in  
6 the process is to file a complaint and go to  
7 an administrative hearing.

8 Contribute to policy and training  
9 development related to enforcement, and then  
10 also implement the Farm Bill provisions  
11 related to enforcement. Within the Farm Bill,  
12 there are enhanced enforcement authorities  
13 that the National Organic Program now has.

14 We have the authority to issue  
15 subpoenas, so we're making sure that our  
16 compliance staff are trained and able to use  
17 subpoenas when we need to do that in the  
18 course of our investigative and enforcement  
19 work.

20 A little bit about residue  
21 testing. One of the most significant  
22 compliance-related issues that we've rolled

1 out over the last few years is residue testing  
2 for certifiers. That was a new requirement  
3 that they do 5 percent of their operations on  
4 a yearly basis starting in 2013.

5 So this was a cross-divisional  
6 effort that we worked with other AMS programs  
7 to develop this residue testing requirements.  
8 We set the residue testing standard through  
9 proposed and final rule making. We've  
10 provided instructions and training to  
11 certifiers and will continue to provide more  
12 of that in the future.

13 We've assessed certifiers'  
14 compliance with these new rules during our  
15 accreditation audits. This is really the  
16 first year that we'll start to do that to  
17 ensure that they're doing 5 percent of the  
18 operations in 2013 and that they've taken  
19 appropriate follow-up action when they find  
20 residues in the course of their work.

21 We've collaborated with the  
22 Agricultural Marketing Service's Science and

1 Technology Program on sampling, on the residue  
2 screens that they conduct and on residue  
3 testing. And they've provided a lot of  
4 service in support to the certifiers to  
5 implement the residue testing requirements.  
6 And we've also conducted enforcement actions  
7 based on residue sample results that have come  
8 in as a basis of this residue testing.

9           So as I said, since 2013,  
10 certifiers are conducting this residue  
11 testing. There's some basic requirements that  
12 the certifiers have to do. They have to  
13 notify the applicant or the certified  
14 operation of any test results when they do  
15 residue analysis, they have to maintain  
16 records of the analysis, and they must provide  
17 results to the public upon request.

18           They must maintain sample  
19 collection information and sample results for  
20 review during the NOP accreditation audits.  
21 And then when residues are found, they have to  
22 investigate why are those residues present,

1 and take appropriate enforcement action.

2 So I'm just going to provide an  
3 example of this in terms of how -- this is  
4 very brief, but how certifiers have been given  
5 instructions and guidance on how to respond to  
6 detected residues, whether it's a prohibited  
7 pesticide, antibiotic, hormone or the GMOs.  
8 So they have to investigate -- when they find  
9 positive residues they have to investigate to  
10 determine the source of the residues and take  
11 appropriate action.

12 And there's basically two things  
13 that they need to determine: whether or not  
14 there was the use of a prohibited substance or  
15 method, or inadequate measures to prevent  
16 contamination or commingling. So there's a  
17 very distinct difference in terms of the  
18 compliance and enforcement action that a  
19 certifier will take based on determining what  
20 has happened.

21 So you get these residue results  
22 and you need to analyze them. Where was it

1 collected, why is it there, what is the  
2 compound, how much is there. And by looking  
3 at those things you can -- it tells you a  
4 story, it gives you information.

5 And then the certifiers that --  
6 working with us as necessary, can make this  
7 determination. Is it the use of the  
8 prohibited substance or is it because of  
9 inadequate buffers or inadequate procedures to  
10 prevent commingling.

11 And if it's the use of the  
12 prohibited substance or method that's  
13 knowingly and willful, then that would be a  
14 proposed revocation, that would be the  
15 outcome. If it was an error, then it would be  
16 a proposed suspension. So sometimes a  
17 prohibited substance may be used by a mistake  
18 rather than a willful violation, and that  
19 would be a reason to go for a proposed  
20 suspension rather than proposed revocation.

21 If it's inadequate measures, then  
22 the appropriate approach is a notice of

1 non-compliance, to require corrective actions,  
2 to put in place better buffer zones, better  
3 procedures to prevent commingling or  
4 contamination during handling. So those are  
5 the basic concepts that we have presented to  
6 certifiers in terms of responding to positive  
7 results.

8           So an example is on GMO residues.  
9 There's been questions of whether or not  
10 organic products are sampled for GMO residues.  
11 So as you know, the USDA organic regulations  
12 prohibit the use of genetically modified  
13 organisms. They prohibit commingling or  
14 contamination during processing and handling,  
15 and they require preventative practices to  
16 avoid contact with GMOs.

17           Organic agricultural products  
18 should have minimal, if any, GMO presence  
19 because of the process that is in place.  
20 There is no tolerance level that's been  
21 established for the presence of GMO material,  
22 but there's still actions that certifiers must

1 take if GMOs are found in the course of their  
2 responsibilities of residue testing and  
3 analysis.

4 So if, during the course of their  
5 work, they find GMO residues, then they have  
6 to do an investigation, why are those GMO  
7 residues there. If the investigation  
8 determines that the residues were there  
9 because there was the use of excluded methods,  
10 then the certifier would take adverse actions  
11 to suspend or revoke the operation.

12 If the certifier determines that  
13 the residue levels are due to inadequate  
14 measures to avoid contact, then -- with  
15 excluded methods from adjoining land use or  
16 commingling, inadequate measures for handling,  
17 then the certifier issues a notice of  
18 non-compliance and there's corrective actions  
19 that are implemented to improve the integrity  
20 of the whole system.

21 So that's just a brief overview of  
22 how we've provided guidance and training to

1 certifiers of how they handle prohibited  
2 substances, including the use of GMO products.

3 Okay. So summary on periodic  
4 residue testing. Test results provide a copy  
5 to the operator and make it available to the  
6 public upon request. Investigate the positive  
7 results to determine the source, and then take  
8 appropriate action when you find residues,  
9 adverse action, notification of authorities as  
10 necessary.

11 So just wanted to cover this  
12 because there's sometimes a lot of questions  
13 or misconceptions about the role of residue  
14 testing, and especially around residue testing  
15 and GMOs.

16 Okay. Now moving to the Standards  
17 Division. Melissa Bailey is the Director of  
18 the Standards Division. Key activities of the  
19 Standards Division is to develop new rules and  
20 coordinate the clearance of those through that  
21 long process; develop and maintain the  
22 regulatory priorities agenda; draft new and

1 updated guidance and policy memos based on the  
2 recommendations from this Board.

3 But also from the Office of  
4 Inspector General findings, we have to address  
5 that. Some of the actions we take are based  
6 on the Office of Inspector General findings  
7 about the program.

8 We also take actions based on  
9 questions from certifiers and from the  
10 community at large and other priority needs.  
11 We develop materials to support the roll out  
12 of new standards, respond to letters and  
13 questions about standards.

14 The division is responsible for  
15 maintaining the National List, including the  
16 petition intake process and response, and the  
17 list management activities. And this is the  
18 division that does most of the support work  
19 for the National Organic Standards Board.

20 So there are successes for last  
21 year. They led, managed, maintained and  
22 communicated progress for approximately 20

1 Standards projects, including regulatory work  
2 plans, rules and communication materials.

3 They completed three final rules,  
4 three proposed rules, two draft guidance  
5 documents and five final guidance documents.  
6 So lots of work coming out of this division.

7 They've developed a regulatory  
8 priority plan to ensure NOP's priorities are  
9 reflected in USDA's regulatory agenda, and  
10 this morning, Melissa showed you how to get  
11 access to that regulatory agenda to see what  
12 those priorities are. They developed the  
13 revised Sunset process to improve the  
14 efficient use of USDA resources and ensure  
15 stability for organic markets.

16 So our priorities for 2014, we  
17 have three things currently in clearance, and  
18 the clearance process is long, so don't expect  
19 these to come out any day now. It's still  
20 weeks, months away before publication. But  
21 the origin of livestock is in clearance, the  
22 proposed rule; aquaculture is in clearance,

1 the proposed rule; and the pet food is in  
2 clearance, the proposed rule.

3 Other rules that are in progress  
4 include sodium nitrate, nutrient vitamins and  
5 minerals, animal welfare, aquaculture,  
6 mushrooms and the National List rule on  
7 biodegradable mulch. So it's -- there's a lot  
8 of stuff.

9 This Board has been busy, there's  
10 still a lot of things for us to do, and  
11 everybody will see their favorite project on  
12 the list and say, "When is it going to come  
13 out?" But that's our list.

14 We actually have I think, what,  
15 over 50 projects on our what we call our  
16 quality management list of things that are  
17 either rule making dockets, instructions,  
18 guidance or policy memos. And that's split up  
19 into A, B and C, and I think everything on  
20 that other rules in progress is in the A  
21 category. So these are the highlights of that  
22 long list of things that we're working on.

1                   Other priorities, draft guidance  
2                   and post-harvest handling. That was just  
3                   published on Friday. Biodiversity and natural  
4                   resource conservation, we're getting close to  
5                   a draft guidance on biodiversity I believe.  
6                   Final guidance made with organic specified  
7                   ingredients of food groups. That's coming out  
8                   this week.

9                   Classification of materials is  
10                  coming out soon -- well, soon, next few  
11                  months. Materials for organic crop  
12                  production, that should be out next few  
13                  months.

14                 These guys are like scowling at me  
15                 now because -- but next few months is pretty  
16                 safe. Right?

17                 Okay. Other projects. Material  
18                 clarifications for certifiers, we have a new  
19                 process to clarify substances that are in that  
20                 gray area where there's a disagreement between  
21                 certifiers of whether a substance is allowed  
22                 or not, so we'll be putting out additional

1 material clarifications for certifiers.  
2 National List management, including technical  
3 report contract management and providing  
4 support for the NOSB committees.

5 Okay. Now I'm going to jump to  
6 Sound and Sensible, how to maintain organic  
7 integrity in a sound and sensible manner. One  
8 of the things that we did that we are required  
9 to do every three years is to assess the  
10 paperwork burden of the USDA organic  
11 regulations.

12 So last year we did an information  
13 collection, which is that process that was  
14 completed in December 2013, so we put out a  
15 Federal Register notice, asked for comments  
16 about the paperwork burden and got lots of  
17 interesting comments, many interesting  
18 comments. And those are all available on  
19 regulations.gov. Right?

20 So I just wanted to highlight a  
21 few of the comments that I thought were very  
22 interesting. We all had the opportunity to

1 find our favorite comments. So these were  
2 some of my favorite comments. One was that,  
3 "The format used by my certification  
4 agency is burdensome in order to meet the NOP  
5 standards, and it takes hours to wade through  
6 it and by-pass the irrelevant portions. My  
7 main time-consuming activity that's beyond  
8 reasonable is the research to determine what  
9 materials are compliant and used in what  
10 fashion.

11 "Trying to find, for example, if copper  
12 azole surface treatment, not pressure  
13 treatment, of wood for fence posts is  
14 prohibited or permitted, and if prohibited, at  
15 what distance from the nearest tree that  
16 produces a certified organic fruit, and how is  
17 that distance measured."

18 So lots of questions about the  
19 details of the standards that make it very  
20 challenging for operators. Another comment,

21 "We have been completely organic since  
22 1999, certified since 2003, and have not

1 substantially changed our operation in that  
2 time, with the exception of adding eight more  
3 acres of production. Every year the  
4 regulations are tightened a little more, and  
5 more things are scrutinized, and the paperwork  
6 burden grows and grows even though we have  
7 always passed recertification inspection, and  
8 good reports since being certified 10 years  
9 ago.

10 "Wouldn't it be better to get more farms  
11 certified and for the government agency to  
12 spend its tax dollars on promoting organic  
13 products so that farmers could get higher  
14 prices for the higher costs of organic  
15 farming, instead of creating an onerous  
16 time-wasting paperwork burden?"

17 And the last of my favorite  
18 comments,

19 "Indirect cross-certification. As an  
20 organic handler/processor with sales of  
21 organic product less than 200 metric tons and  
22 revenue of less than \$750,000, I would

1 estimate our annual time requirements based  
2 upon activity as followed: maintaining  
3 organic handling production sales records,  
4 about 200 hours."

5 What's that, five weeks?

6 "Preparation, follow-up and  
7 participation in the annual inspection"

8 That's only 20 hours.

9 "Maintaining knowledge of organic  
10 regulations, training and et cetera, 40  
11 hours."

12 So a significant time investment  
13 that people invest in understanding and  
14 keeping the records and complying with the  
15 requirements.

16 So, those are some of the reasons  
17 why I get excited about this, the Sound and  
18 Sensible concept, the Sound and Sensible  
19 Initiative to try to make certification both  
20 high integrity but reasonable and practical.

21 So, some of the issues that we  
22 need to address. Inconsistent certification

1 process. We've identified that during some of  
2 our audits. We continue to provide training  
3 to certifiers to try to get more consistency  
4 in the certification process, the focus and  
5 burden of record keeping, the expense of  
6 certification, the burden of time that's  
7 involved in inspections and maintaining  
8 paperwork.

9 It's really the indirect costs  
10 that I think that are really more burdensome  
11 than the direct costs. And we all know that  
12 there are many farms that comply with the  
13 basic organic standards in terms of the  
14 production practices, but they avoid  
15 certification. They don't need it for their  
16 market, or they just don't want to go through  
17 the hassle.

18 So that's why we've started the  
19 Sound and Sensible Initiative. Three key  
20 concepts: affordable, accessible and  
21 attainable. Affordable meaning reasonable  
22 fees, reasonable compliance costs.

1 Accessible, that there are certifiers and  
2 technical assistance that's available in all  
3 local areas all across the country. And  
4 attainable, that people understand what the  
5 requirements are, plain language, and  
6 reasonable record keeping requirements.

7           So great concepts, it's just how  
8 do we actually implement that? So we've done  
9 a few things. We've issued technical  
10 assistance instructions about a year ago for  
11 certifiers and inspectors that they are  
12 responsible to provide technical assistance to  
13 the certified operations.

14           We've clarified some of the  
15 requirements around organic system plans that  
16 came out in the fall showing that there's  
17 multiple ways to comply, and we feel that  
18 we've streamlined the certification process,  
19 and then we're also been really pushing the  
20 concept of mediation and settlement agreements  
21 to support continuous improvement and timely  
22 compliance with the requirements.

1                   So just as a summary,  
2                   certification must be sound, objective and  
3                   complete evaluation of compliance, verify and  
4                   enforce compliance, take action on  
5                   non-compliances. So we will insist on this.

6                   It has to be sound, we have to  
7                   make sure that certifiers don't just go on the  
8                   sensible side of things, but make sure that  
9                   integrity is maintained throughout the whole  
10                  chain of -- from farm to market, and -- but  
11                  also should be sensible and reasonable records  
12                  that verify compliance, educating farmers and  
13                  handlers on the requirements so that they can  
14                  be successful.

15                  So for 2014, our focus, in terms  
16                  of the soundness of it, is increased focus on  
17                  non-certified operation, no organic claims  
18                  unless you were exempt or excluded from  
19                  certification, so we have a number of both  
20                  enforcement actions and educational efforts  
21                  going on in that regard.

22                  And that it should be sensible,

1 developing affordable, accessible and  
2 attainable certification programs for  
3 underserved areas. And I'll get to that in a  
4 moment. And that's this. So there -- with  
5 some of the new resources that we have this  
6 year, we're going to be issuing a multi-award  
7 contract opportunity, so we've set aside some  
8 of the money in our fiscal 2014 funds to  
9 support projects that develop sound and  
10 sensible organic certification models,  
11 training and outreach.

12           There's a draft performance work  
13 statement online at [fedbizops.gov](http://fedbizops.gov), so any  
14 certifiers in the room or people that are  
15 interested in providing training or technical  
16 assistance should check this out. We  
17 encourage certifiers and other organizations  
18 to form teams to respond to the final  
19 solicitation once that's posted. We hope to  
20 get that posted within the next few weeks.

21           And to help you, if you're  
22 interested in this kind of thing, you can sign

1 up as an interested vendor at this particular  
2 link below. We'll get this posted on our  
3 website so I don't have to read all that long  
4 listing there. This will also be announced in  
5 the Organic Insider.

6 So opportunities for certifiers  
7 and others to develop more sound and sensible  
8 systems, because we all know that there has  
9 been some burdens that have been put on the  
10 organic community that don't add value, that  
11 don't -- that aren't really necessary to  
12 protect organic integrity. Let's try to  
13 develop a better system so that we can support  
14 organic farmers and handlers and their success  
15 in the organic marketplace.

16 Okay. Get the right thing here.  
17 Okay. On to the Farm Bill, and Mark Lipson  
18 will be covering this in more detail.

19 But in general there's a lot of  
20 different organic provisions in the Farm Bill.  
21 \$100 million for organic research, extension  
22 and education. \$5 million for the organic

1 data initiatives. This is primarily money  
2 that's going to be used by the Economic  
3 Research Service and the National Agricultural  
4 Statistics Service, a little bit by Market  
5 News to improve the data around organic  
6 agriculture and the organic industry.

7 \$5 million -- no, let's see --  
8 expanded option for organic crop insurance,  
9 expanded exemptions for organic producers who  
10 are putting into commodity check off programs.  
11 The Farm Bill also authorizes USDA to consider  
12 an application from the organic sector to  
13 establish its own check off program. So  
14 that's authorized in the Farm Bill. Whether  
15 or not it happens or not is -- we'll see.

16 Improved enforcement authority for  
17 the NOP to conduct investigations, and \$5  
18 million for a technology upgrade for the  
19 National Organic Program, and \$11-1/2 million  
20 annually for certification cost-share  
21 assistance.

22 In terms of the NOP information

1 technology improvements, we do have a report  
2 on this that we published in March of 2013.  
3 It describes the primary needs that we have  
4 around the technology upgrade.

5 So if you're interested in the IT  
6 area, the data of organics, I'd really  
7 encourage you to take a look at that report.  
8 It kind of spells out some of our initial  
9 ideas and plans for this technology upgrade.

10 Some of the things we're looking  
11 at is a registry of exempt and excluded  
12 operations to include as a part of the overall  
13 project an ability to issue USDA certificates  
14 and export certificates, for example to  
15 European countries; a real time list of  
16 certified organic products; importance for  
17 certified operations and for the public and  
18 for certifiers and state organic programs to  
19 interface with the - this overarching  
20 database.

21 Okay. So that's a quick run  
22 through, some of the things that we're working

1 on at the National Organic Program. So any  
2 questions from the Board?

3 CHAIR STONE: John?

4 VICE CHAIR FOSTER: So there's a  
5 quite a reduction in the number of accredited  
6 certifiers since NOP started. I think it was  
7 102 or something back in 2002 and it's 84 now.  
8 So I'm wondering if there's a -- what the --  
9 where the reductions are happening, either  
10 national or international. And why some folks  
11 -- why almost 20 certifiers have gotten out of  
12 the pool.

13 MR. McEVOY: Sure. Yeah, I don't  
14 think it was 100 in 2002, but just a few years  
15 ago there was about 100 accredited certifiers.  
16 There's been a number that have dropped out  
17 because of the equivalency arrangements.

18 So the -- we used to accredit  
19 certifiers in Canada, and none of them need to  
20 be -- if they're only operating in Canada,  
21 they no longer need to be accredited under the  
22 NOP. A number of the European certifiers have

1 dropped out as well. There have been some US  
2 certifiers, some smaller certifiers in the US  
3 that have dropped out of accreditation as  
4 well.

5 VICE CHAIR FOSTER: On the US  
6 certifiers that have dropped out, what's been  
7 their rationale, or their need or lack of  
8 resources or whatever it was?

9 MR. McEVOY: Yeah, there's been  
10 different reasons for different certifiers to  
11 drop their accreditation. That for some of  
12 them, as we started to do more rigorous audits  
13 and oversight of how they operated, they were  
14 unable to meet the accreditation requirements,  
15 and rather than going through adverse action  
16 procedures, they decided to get out of the  
17 business.

18 CHAIR STONE: Calvin?

19 SECRETARY WALKER: Yes, I don't  
20 know if everyone was asleep, but I think we  
21 should give the NOP a round of applause, and  
22 to Secretary Vilsack for giving the organic

1 program some additional funding.

2 (General applause.)

3 SECRETARY WALKER: My comment, and  
4 I have a question, an explanation, the --  
5 Wendy is probably familiar with it, because  
6 when the pork industry years ago was having  
7 issues with research and those things, there  
8 was nine groups -- nine individuals out of  
9 Illinois, they started what they call the  
10 Moline 9 that ultimately gave rise to the  
11 National Pork Producers Council.

12 And it's probably one of the  
13 strongest commodity groups that we have. And  
14 I was particularly glad to hear that we have  
15 a check off. Could you elaborate? You had  
16 mentioned about appropriation for that. But  
17 I think it's very good for all the industry.

18 MR. McEVOY: Okay. So there's no  
19 appropriation for the check off. The Farm  
20 Bill authorizes further exemptions for organic  
21 producers to not have to pay into existing  
22 commodity programs, commodity check off

1 programs. So that is already started. It has  
2 to go through a rule making process, a  
3 proposed and final rule to expand the  
4 exemptions for organic producers to not pay  
5 into existing check off programs.

6 The other part is it also  
7 authorizes the organic community to set up  
8 their own check off program for the organic  
9 industry. And my understanding of that  
10 process is that the industry would make a  
11 proposal to AMS, and AMS as a neutral party  
12 would then work with that.

13 And if certain conditions are met  
14 at a certain point, there would be a  
15 referendum, and then the folks that were  
16 potentially subjected to the organic check off  
17 would have an opportunity to vote on whether  
18 or not they wanted to set up an organic check  
19 off or not.

20 So it's really up to the organic  
21 industry to -- you have the authority to  
22 request an organic check off, but you have to

1 make that proposal to AMS to get that process  
2 started.

3 CHAIR STONE: Okay. Thank you  
4 very much, Miles. Take a deep breath there  
5 for a minute.

6 We now have Mr. Mark Lipson with  
7 an update from the Secretary's office.

8 MR. LIPSON: Good afternoon  
9 everybody. Wake up.

10 (General laughter.)

11 MR. LIPSON: I always seem to be  
12 getting slighted in the afternoon nap time in  
13 my talks this year.

14 I'm going to try and gain a few  
15 minutes on our lost time, so forgive me if I  
16 go a little bit fast. Definitely want to  
17 leave time for a little bit of questions from  
18 the Board, and if the audience -- if the Chair  
19 entertains that.

20 So this is a quick update of USDA  
21 organic policy realms beyond the NOP and the  
22 NOSB. Despite the massive amount of things

1 that you've heard Miles talk about that the  
2 NOP and the Board have to do, there are, in  
3 fact, a whole other universe of things that go  
4 on in the Department of Agriculture related to  
5 organic.

6 So I'm going to try and cover  
7 briefly those we talked about just a little  
8 bit at the training in February, so some of  
9 this is in the way of update since then, and  
10 other background.

11 So this is that one. All right.  
12 The first point is that organic is being  
13 integrated throughout the Department across  
14 every agency, department-wide. And this will  
15 affect our many producers and handlers and  
16 consumers in other ways beyond what you track  
17 with the NOP.

18 This is both the result of  
19 intentional commitment by the Department and  
20 this administration, as well as Congressional  
21 drivers like the Farm Bill and the  
22 appropriations process.

1                   When I came in and began my job as  
2                   organic policy advisor in 2010, there had just  
3                   recently been established a strategic plan  
4                   performance objective, not strictly a goal,  
5                   but a performance objective for a 25 percent  
6                   increase in the number of organic businesses  
7                   under certification by 2015 from the 2009  
8                   baseline.

9                   We're not going to hit that goal  
10                  probably. We still might. But it was an  
11                  extremely ambitious goal and I think we'll  
12                  come fairly close. The very sharp spike in  
13                  conventional commodity prices in those years  
14                  I think certainly affected the conversion to  
15                  organic, especially in commodity crops.

16                 The hiatus in the Farm Bill, we  
17                 had a gap of a year-and-a-half, two years in  
18                 some cases for some of these programs where we  
19                 didn't have tools and resources to continue  
20                 the kinds of things that we can do to help get  
21                 more organic production and businesses going.

22                         So despite that, the trend in

1 2013, we saw reversed in terms of the rate of  
2 growth, after the rate of growth declining  
3 during 2011 and 2012, and 2013 we saw that  
4 rate of growth start to increase again. So  
5 hopefully that's a good sign for the future.

6 My role as organic policy advisor  
7 I'm going to touch on just briefly now and  
8 then come back to that at the end. This is a  
9 priority that the organic community had  
10 expressed to the incoming administration, and  
11 so I'm the first one.

12 But my job is to serve in the  
13 Office of the Secretary and advise, I'm not a  
14 decider, but advise the Secretary and the  
15 entire realm of the Secretary's office, which  
16 is all the undersecretaries, et cetera, and  
17 their staffs when the O word shows up on their  
18 screen.

19 And as part of that I also do work  
20 very closely with the National Organic Program  
21 when their thousand rule making projects make  
22 it up to the policy level. And during her

1 tenure, the Deputy Secretary, Kathleen  
2 Merrigan, former deputy now, and I worked very  
3 closely, essentially every day, facilitating  
4 that process and putting our eyeballs on  
5 everything that was coming out of NOP and  
6 moving through the clearance process.

7           The first thing that we did, when  
8 I came in, was to convene what had been an  
9 informal USDA organic working group, and at  
10 the direction of the Secretary and with the  
11 Deputy's leadership, we've made the organic  
12 working group more formal, in terms of  
13 requiring representation from every agency in  
14 the Department. And I'll speak a little bit  
15 more in a second about how that works.

16           The Organic Literacy Initiative  
17 was the first big project of this new  
18 formalized organic working group. We did a -  
19 sort of a survey process throughout USDA to  
20 find out how many USDA employees in all its  
21 various agencies and field offices actually  
22 knew about the organic standard and the fact

1 that a branch of USDA actually managed the  
2 organic standards and the seal. And, in fact,  
3 a very significant proportion of them did not,  
4 or knew very little about it.

5 So we undertook what we called the  
6 Organic Literacy Initiative to train USDA  
7 employees about the program and the standards  
8 and the seal so that they, in turn, could be  
9 prepared to offer information to people who  
10 came into their offices who either were  
11 already organic or interested in being  
12 organic, and instead of just getting a shrug  
13 or a, "No, we don't do that," they would know  
14 that, in fact, that is part of USDA's  
15 responsibility, part of their responsibility  
16 as USDA staff to facilitate and to be able to  
17 know where they can direct people for more  
18 information.

19 And then a year ago, May, the  
20 Secretary took another step and issued his  
21 departmental guidance directive to all the  
22 agencies regarding organic agriculture and

1 markets, and that was a very, very significant  
2 institutional step that I'll talk a little bit  
3 more about. So that's just the big picture of  
4 what I'm going to try and cover, again, quite  
5 quickly.

6 The guidance itself had five main  
7 areas of concern. Regulatory reciprocity  
8 within USDA. That is where agencies had  
9 regulatory or information requirements related  
10 to the programs that they were delivering that  
11 may overlap with the National Organic Program  
12 requirements, to streamline those and, in  
13 fact, make sure that they weren't in conflict  
14 and to try and reduce the paperwork burden on  
15 producers and handlers to make it work better  
16 for everybody. So the directive requires  
17 agencies to work on that process with the NOP.

18 It asks every agency for their  
19 research needs related to organic, either for  
20 their own purposes or for their customers'  
21 purposes. Same with data. The directive  
22 specified that each agency will deal with

1 outreach and training for all of their  
2 contacts throughout the country in terms of  
3 how they're doing their job. And finally,  
4 encouraging the growth of the organic sector  
5 as the implementation of the strategic plan  
6 performance objective.

7           There are organic working group  
8 teams for each of these. I'll go through them  
9 very quickly, just the highlights of their  
10 2014 work plans related to these.

11           For the reciprocity directive, the  
12 primary focus, right now, is on coordination  
13 with the Natural Resources Conservation  
14 Service, and their program requirements as  
15 they overlap or interact with the NOP  
16 requirements.

17           It's a very, very important facet  
18 of how USDA can try and work better for  
19 organic agriculture, and also help improve the  
20 performance of organic agriculture with  
21 respect to conservation activities and  
22 outcomes.

1                   The work plan for the data  
2                   collection committee and data analysis  
3                   includes a master inventory of all USDA data  
4                   related to organic. In fact, a number of  
5                   agencies are collecting data, but it's not all  
6                   coordinated or even known to each other. So,  
7                   that'll be a very significant outcome for  
8                   everybody to have this year.

9                   Support for increasing the number  
10                  of international trade codes. It requires a  
11                  fair amount of data. And then finally,  
12                  collation of stakeholder data needs. Many  
13                  agencies are hearing about different data  
14                  needs from their customers, so this group is  
15                  making an effort to collate those all in one  
16                  place.

17                  Training and outreach. The USDA  
18                  organic topic pages which I'll show you in a  
19                  minute is a very significant new step that  
20                  provides a one-stop shop for all the  
21                  Department's information related to programs  
22                  that affect, or are specifically for organic

1 agriculture.

2 We're in the process now of  
3 updating our organic resource guide with new  
4 information following the Farm Bill. And we  
5 will continue the progress on the Organic  
6 Literacy Initiative.

7 To date, as of March, there were  
8 over 30,000 USDA employees that have taken the  
9 basic organic 101 online training course. So  
10 that's essentially a third of the USDA  
11 workforce in only about a year-and-a-half.  
12 So, yeah, that's a very, very significant  
13 accomplishment that should have benefits over  
14 the long haul.

15 This is just a screen shot of the  
16 USDA topic page. If you go to the usda.gov  
17 main page, under the topics tab there is now  
18 for the first time an organic topic tab, which  
19 contains links to all the agencies and their  
20 work related to organic, and their work  
21 related to the organic working group.

22 Under the Secretary's guidance

1 relative to growth of the organic sector, this  
2 is still in its early stages of development,  
3 but we're going to start out with sort of an  
4 electronic town hall discussion in the --  
5 probably in the next month or so, so keep your  
6 eyes out for that, to try and generate ideas  
7 about how we better facilitate growth of  
8 organic.

9           And the second project out for  
10 that team is trying to collect transition  
11 resources that are scattered throughout the  
12 Department and other places and try and do a  
13 better job of at least providing a one-stop  
14 shop for that kind of information.

15           And one place where the guidance  
16 intersects directly in the work of the OWG,  
17 intersects directly with that of the Board is  
18 in terms of the research priorities that the  
19 Board passed in 2012 and is going to work on  
20 again at this meeting.

21           The research team of the organic  
22 working group reviewed the research

1 recommendations from the Board recently and  
2 has provided an assessment. So that's what  
3 Michelle just passed out to all of you, and I  
4 think there are a handful of copies out on the  
5 table for the audience, and we'll be happy to  
6 make more, and that'll be made part of the  
7 record of this meeting.

8           So this group included all the  
9 research agencies, the National Institute for  
10 Agriculture, ARS, ERS, also included NRCS and  
11 Dr. Brines from the NOP program also  
12 participated on this team to make sure that  
13 she could help translate, you know, some of  
14 what the Board was trying to express.

15           So, these comments and  
16 recommendations from the research team have  
17 now been provided back to the Board. We gave  
18 them to the materials committee a couple of  
19 weeks ago and to the Board as a whole now.  
20 And those recommendations will also go to the  
21 various research agencies themselves, to their  
22 leaderships.

1                   And just a couple of highlights  
2                   related to that. The research priorities in  
3                   terms of whole farm systems, alternatives for  
4                   antibiotics, alternatives for methionine and  
5                   investigation of the principles of livestock  
6                   herd health have been, and will continue to be  
7                   prioritized by the Organic Research and  
8                   Extension Initiative. These are things that,  
9                   you know, have been heard before and have been  
10                  incorporated into the priorities.

11                  But one of the pieces of feedback  
12                  that we did get from the research work team  
13                  was that the strength of proposals that they  
14                  have received for some of these topics has not  
15                  been adequate, that even though it's been made  
16                  a priority, the requirements for the quality  
17                  and methodology of the proposed project still  
18                  has to be at the highest level because it is  
19                  a very, very competitive program.

20                  So that's just an important bit of  
21                  feedback that people should be carrying back  
22                  to their partners in research institutions and

1 in formulating their own proposals.

2 And one other thing I'll do -  
3 I'll mention from this feedback is that they  
4 felt that the questions and recommendations  
5 that the Board was posing in terms of  
6 aquaculture, and in terms of genetically  
7 engineered vaccines needed more specificity  
8 for them to be able to respond adequately.

9 So they're looking for more  
10 specificity and detail in terms of  
11 recommendations from the Board, in terms of  
12 how USDA research programs can assist with  
13 those questions. So, you know, there's a  
14 little more nuance than that to it, but that's  
15 just one of the highlights of the feedback.

16 I'm not really going to go into  
17 more detail on any of Farm Bill issues here in  
18 the interest of time. We did have a couple of  
19 Farm Bill listening sessions on organic, a  
20 short one at the Natural Foods Expo and then  
21 a more formal one that we conducted at USDA  
22 with a number of phone lines for people to

1 participate.

2 All of this feedback on  
3 implementation of the Farm Bill programs is  
4 ongoing, so you can make comments any time to  
5 any of the agencies, and you can find that  
6 information on the USDA Farm Bill topic page  
7 with information about whom to contact, and  
8 you can also certainly always find me for that  
9 information.

10 The request for applications for  
11 2014 for the Organic Research and Extension  
12 Initiative is already out there. If you're  
13 not working on a proposal now, you probably  
14 don't have too much time left to start. But  
15 that cycle is underway and we're looking  
16 forward to the results.

17 I just want to emphasize my  
18 gratitude to everybody who worked on all of  
19 these topics during the Farm Bill process.  
20 It's incredibly important that we got all  
21 these things restored in the Farm Bill and  
22 everybody who worked on that deserves thanks

1 from those of us who get to implement it.

2 So I'll just close by talking a  
3 little bit about my role and my position.  
4 This is the last Board meeting that I'll  
5 attend in this capacity. It'll be four years  
6 in a few weeks since I started this job, so my  
7 contract term is ending, and I am not going to  
8 continue doing it.

9 So by the time the next Board  
10 meeting comes around, there should be a new  
11 organic policy advisor in this capacity. The  
12 Secretary and the leadership of the Department  
13 are very committed to this role continuing.  
14 It has shown to have benefits for everybody in  
15 the Department to have such a position.

16 It won't necessarily look exactly  
17 like mine because we are trying to figure out  
18 how best to institutionalize it, because mine  
19 was a temporary position. And there is a  
20 commitment to trying to make this a permanent  
21 role so that it doesn't go away with the next  
22 administration.

1                   There may be several people with  
2                   different assignments fulfilling different  
3                   parts of the role, but it is something that  
4                   you all should, you know, be cognizant of in  
5                   its transition and make best use of it.

6                   I guess I'll stop there. I don't  
7                   know how long that ended up being, but thank  
8                   you all for your service and, you know,  
9                   interaction with the -- all these other things  
10                  that we've got to work on to advance organic  
11                  agriculture beyond the standards and the  
12                  certification process.

13                  CHAIR STONE: Well, Mark, that was  
14                  obviously very impressive of the broader being  
15                  institutionalized within USDA. And as a  
16                  long-time friend and benefactor of your  
17                  knowledge of organics, I'd like for us to give  
18                  you a hand for what you've done for all of us  
19                  --

20                  (General applause.)

21                  MR. LIPSON: Thank you. Thank  
22                  you.

1 CHAIR STONE: No, thank you, Mark.

2 Is there any follow-ups? I mean  
3 that's just impressive.

4 And, John?

5 VICE CHAIR FOSTER: Thank you,  
6 Mark. Be nice to maybe see you around the  
7 home front a little bit more than we have  
8 lately. It'll be nice.

9 I had two questions. The organic  
10 topics tab that you talked about, what's the  
11 role, like why is that an important thing in  
12 your view? And, yes, that is a leading  
13 question.

14 MR. LIPSON: The organic topic  
15 page, you know, in and of itself, well, it's  
16 on the website but information is powerful and  
17 all the activity that's going on in the  
18 Department with respect to organic and all  
19 these other spheres has been very difficult  
20 for people to access.

21 Look, the USDA website overall has  
22 not been very user friendly, I think. You

1 know, I'm not throwing anybody under the bus  
2 to say that because it's a vast, you know,  
3 department and many, many different kinds of  
4 things and all different kinds of approaches  
5 to web-based information.

6 So the fact that we were able to  
7 collate it all in one place and have a focus  
8 for maintaining that information, you know, so  
9 that it can be refreshed more easily I think  
10 will serve everybody. And so it's just a  
11 manifestation of the sort of working level  
12 attention to what's needed.

13 VICE CHAIR FOSTER: So correct me  
14 if I'm wrong. That's a way for the USDA to  
15 recognized the kind of interest there is in a  
16 really easily documentable form.

17 MR. LIPSON: Well, it is a  
18 recognition of the interest. And as we were  
19 developing the website, the IT people told us  
20 that organic was consistently among the top  
21 three search items in the little search box  
22 for the USDA webpage.

1                   And so that contrasted with the  
2 fact that the only link you could get from the  
3 main page was to NOP, and that was listed  
4 under Nutrition for some reason, you know,  
5 spoke to the importance of being able to have  
6 a better way of people finding that  
7 information.

8                   VICE CHAIR FOSTER: Then my last  
9 question, what are you most excited about?  
10 Out of the things that you've been able to do  
11 in four years, what thrills you, you know, if  
12 you had to pick one.

13                   MR. LIPSON: Well, the Organic  
14 Literacy Initiative, I think, is hard to  
15 overstate the importance of and how far we  
16 came so quickly in terms of  
17 institutionalizing, respect for, and attention  
18 to the needs of the organic sector within all  
19 these different parts of the Department.

20                   CHAIR STONE: Nick?

21                   MEMBER MARAVELL: Thanks for that  
22 presentation, Mark. I was wondering if you

1 could just give us a little bit of your take  
2 on where the AC -- I noticed you left that one  
3 out -- where the AC21 committee is sort of  
4 going, and how we in the organic community can  
5 best participate in that.

6 MR. LIPSON: The advisory  
7 committee on agricultural biotechnology for  
8 the 21st century, otherwise known as AC21, was  
9 reauthorized in the Farm Bill, because it's a  
10 subsidiary of the master research advisory  
11 FACA committee, so it had a hiatus during the  
12 Farm Bill disruption.

13 So it has been reauthorized but it  
14 hasn't been reconvened or recharged yet. So  
15 one of the products of the previous version of  
16 the advisory committee was in their report of  
17 November 2012 which included a recommendation  
18 for the Department to seek stakeholder input  
19 on the whole question of co-existence and  
20 information and stewardship practices that  
21 facilitate co-existence.

22 That is, how users of different

1 production systems and technologies can  
2 co-equally meet the needs of their markets.  
3 That's how -- basically how it's defined.

4 So USDA did have a Federal  
5 Register notice seeking that information, a  
6 specific set of questions and some more  
7 general solicitation of input. That Federal  
8 Register comment period, after extension,  
9 closed on March 3, and those comments are  
10 being processed now by the Department.

11 And as a result of analyzing those  
12 comments, there will be proposals and  
13 discussion for how to move forward in terms of  
14 either public workshops and/or reconvening the  
15 AC 21 committee with a new charge to follow up  
16 on some specific questions. But I don't know  
17 what those are going to look like right now.

18 I think the best thing to do is to  
19 look for the results of that comment analysis  
20 -- and all those comments of course are  
21 visible on regulations.gov -- and continue to  
22 provide your inputs to what you think the next

1 steps for USDA should be. That's the best  
2 answer I can give you.

3 CHAIR STONE: All right. Mark,  
4 thank you very much for being here, and thank  
5 you for your work in DC and devoting that much  
6 time and attention to this cause. Thank you  
7 and good luck.

8 MR. LIPSON: All right. And I  
9 just -- I want to emphasize the importance of  
10 our next speaker, who is from the Natural  
11 Resources Conservation Service, Sarah Brown,  
12 who is one of the primary spear carriers  
13 institutionalizing organic throughout field  
14 offices of NRCS in the -- throughout the whole  
15 country.

16 And the topics that she's  
17 addressing are very, very important for the  
18 Board and for the organic community as a whole  
19 in terms of better service by the conservation  
20 programs, better conservation performance of  
21 organic systems. Thanks.

22 CHAIR STONE: Well, Sarah, I don't

1 think I could a better introduction than that,  
2 so the floor is all yours, and thank you for  
3 being here as well.

4 MS. BROWN: Yes, thank you. I was  
5 going to sit up here an start by thanking Mark  
6 because he's one of the primary reasons I'm  
7 here. The efforts to integrate USDA agencies,  
8 efforts around organic definitely falls in  
9 line with the work I've been doing.

10 And just to give a little bit of  
11 background before I get started here, I have  
12 been working with the Natural Resource  
13 Conservation Service now for about four years  
14 in the position as the National Organic  
15 Specialist with the agency.

16 And it's a pretty unique role.  
17 I'm supported by a contribution agreement  
18 between NRCS and my employer, Oregon Tilth,  
19 and when I initially started, the focus was to  
20 provide technical assistance to the agency.

21 So I've been to a dozen plus  
22 states offering in-person trainings to NRCS

1 staff and other ag professionals. I've  
2 actually had the opportunity to visit Mac's  
3 farm with about 30 NRCSers and talk about how  
4 they're managing soil fertility. So, it's  
5 been a really interesting and unique  
6 perspective.

7           And the response from NRCS has  
8 been overwhelmingly positive. The fact that  
9 I'm here today, I think, is a testament to how  
10 far we've come because when in initially  
11 started there was very little conversation  
12 between NRCS and NOP and there's quite a bit  
13 of overlap in our goals to promote and further  
14 sustainable agriculture. So we've come a  
15 long, long way.

16           So that being said, I'll try to  
17 move this forward here. I'm going to talk  
18 very briefly about the NRCS programs that are  
19 available to organic producers, and  
20 unfortunately they've been pretty  
21 underutilized, and I'm hoping that in a room  
22 here of folks that are supporting organic,

1 it's something that we can begin to talk a  
2 little bit more about.

3 Secondly, I wanted to just briefly  
4 mention some of the work that we're doing to  
5 link up organic system plans with conservation  
6 planning, because there's a lot of opportunity  
7 to reduce redundancy, one of the primary goals  
8 obviously of Sound and Sensible.

9 And then lastly, I'm going to be  
10 continuing the conversation that -- well, I  
11 guess maybe starting the conversation in  
12 response to the memo that went out yesterday  
13 by the NOP relating to soil conservation on  
14 organic farms. So I'll be sharing the NRCS  
15 kind of perspective and experience about that.

16 So just very briefly, the NRCS is  
17 very much focused on conservation and so they  
18 have a couple of different services and  
19 methods of approaching that. If you haven't  
20 seen their web soil survey, it's an awesome  
21 resource.

22 And I should mention also that I

1 am a transitioning farmer. My husband and I  
2 own land in Oregon, so I have had the  
3 opportunity to work with NRCS firsthand and  
4 get some insider perspective on what that  
5 process looks like. And it's been an  
6 incredibly valuable program and service for us  
7 as well.

8 So not only can you get assistance  
9 with designing conservation practices, but you  
10 can also get financial assistance, which is a  
11 big, big help, especially as a beginning  
12 farmer. There is also programs and projects  
13 related to emergency assistance, and I work  
14 with partners, our agreement being one of  
15 those.

16 So when you start with NRCS, the  
17 primary issue is what are producers' resource  
18 concerns? And all these photos here are  
19 photos that I've taken on organic farms, and  
20 that's kind of unfortunate because there are  
21 issues on some of these farms, and I have  
22 different label descriptions here of resource

1 concerns.

2                   And I want to be really clear that  
3 resource concerns mean different things to  
4 different people, but NRCS has very specific  
5 standards and definitions of what those look  
6 like. So I think the current list is there's  
7 60 resource concerns that NRCS evaluates. And  
8 these are just some of those.

9                   And the way that they evaluate  
10 them, they use very complex tools that most  
11 people would have a very difficult time  
12 learning how to use, myself being one of them.  
13 And the tools are very helpful, they provide  
14 quantitative kind of measures of what  
15 different resource concerns look like.

16                   That being said, they're just a  
17 tool and they're not perfect, and especially  
18 when you're talking about a CSA farm that has  
19 100 different crops on an acre and a half.  
20 Things get really, really complicated.

21                   And so I do want to mention while  
22 these are very valuable tools, and I think

1 there's opportunity to further their use,  
2 there are members of the organic community  
3 that see concerns with using them.

4 RUSLE2 being one. It measures  
5 erosion on organic farms, and there's some  
6 question about whether or not it accurately  
7 accounts for the function of soil biology.  
8 And so clearly that's worth discussing and  
9 figuring out.

10 So once NRCS is out on your farm,  
11 you identify resource concerns, there's  
12 programs and there's finances to help  
13 producers. EQIP is one of those programs. A  
14 producer will be able to choose from a variety  
15 of conservation practices.

16 And the program, it's not just for  
17 certified producers, so transitional and  
18 exempt producers are also eligible to apply  
19 for this program, which is great because  
20 they're definitely often in need of assistance  
21 as well.

22 There are lower financial limits

1 to this program than if you go through regular  
2 EQIP, but the hope and the goal, initially the  
3 intent was to spread the money further. As I  
4 mentioned, unfortunately it's still  
5 underutilized.

6 In some things it's probably  
7 difficult to see, but one of the issues that  
8 still needs to be addressed that I just raise  
9 here for awareness, is that transitioning and  
10 exempt producers are still actually required  
11 because of statute to self-certify that  
12 they're developing or implementing an organic  
13 system plan, which is not a National Organic  
14 Program requirement.

15 So that's still an issue that  
16 we're talking about and trying to address. In  
17 most cases that's not a significant hurdle,  
18 but it is a little bit of an inconsistency.

19 So what are conservation  
20 practices? These are all depicting different  
21 options producers have: prescribed grazing,  
22 compost facilities, pollinator habitat, mulch,

1 high tunnels, all sorts of different things  
2 producers can choose from.

3 We just put in 1200 feet of  
4 pollinator habitat on our farm along the road  
5 that's also going to serve as a buffer, and  
6 we're pretty excited about that.

7 And this is an example of what a  
8 producer's conservation map might look like of  
9 their operation. So this is a diversified  
10 farm in California. They received assistance  
11 implementing watering facilities, fences,  
12 hedgerows, cover crops, mulching, pest  
13 management, nutrient management, there's a  
14 whole host of practices to choose from.

15 You can find out more on the  
16 website. And additionally on the website,  
17 there's a list of the NRCS state organic  
18 contacts. So it's a really important thing to  
19 be aware of, that each state has an organic  
20 contact in their office, which can be a very  
21 helpful advocate if there are issues on the  
22 field levels.

1                   And briefly I also wanted to  
2                   mention the conservation stewardship program.  
3                   This really aims to work with producers who  
4                   are already implementing conservation a bit  
5                   and helping them take it to the next level.  
6                   And so they do that through a variety of  
7                   enhancements, so maybe the producer's already  
8                   covercropping, but they want to begin  
9                   inter-cropping. So this is an example of one  
10                  of the practices -- or the, I'm sorry, the  
11                  enhancements that might be available to them.

12                  Okay. And so some of the key I  
13                  think opportunities for overlap between the  
14                  efforts or the services available through NRCS  
15                  and the NOP standards are definitely related  
16                  to buffers and building soil organic matter.  
17                  There's a lot there and lot that producers can  
18                  access.

19                  Crop rotations, nutrient  
20                  management, minimizing erosion, which I'll  
21                  speak to in just a bit, efforts to increase  
22                  biodiversity. NRCS has hedgerows and you can

1 get assistance with pollinator meadows and  
2 riparian areas, all sorts of different things  
3 along those lines and structural practices as  
4 well.

5 So the key thing here is that NRCS  
6 does not work on production-related issues.  
7 So if a producer came in and said, I'm really  
8 interested in using less fertilizer because  
9 I'm spending a lot of money and it's just cost  
10 prohibitive to me, that's not really an  
11 approach that would get you very far with  
12 NRCS.

13 Same if you said, I'm having  
14 really bad pest pressure and, you know, I want  
15 to spray. That's really not going to get you  
16 anywhere. So you have to really think about  
17 it in terms of resource concerns and  
18 conservation.

19 So Mark briefly mentioned our  
20 efforts to link conservation plans and organic  
21 system plans. And the way that we've been  
22 doing this -- and I apologize here if I'm

1 getting into acronyms and codes -- but NRCS  
2 has had a very specific plan available for  
3 producers called the CAP 138.

4 And the goal and the intent of  
5 that was to aid transitioning producers  
6 through the process to help them get ready for  
7 organic certification. Unfortunately it has  
8 fallen a little bit short in doing that,  
9 mostly because of the format.

10 Also because the individuals who  
11 are supposed to be writing this plan, the  
12 Technical Service Providers, there's only  
13 about a dozen nationwide. I think there's two  
14 or three in the room here today. But there's  
15 not enough folks available. Training them on  
16 how to use NRCS tools is really, really  
17 complicated.

18 And so Melissa and I and a couple  
19 of other folks have been meeting on a very  
20 regular basis to revisit the intent of this  
21 plan and discuss maybe there's a different  
22 approach we can take.

1                   And what we're currently working  
2                   on, which I'm really excited about, and I was  
3                   able to share with the different certifiers  
4                   this last February, is we've taken the  
5                   national -- the NOP OSP template and we've  
6                   pulled out the components of that that are  
7                   related to NRCS, so soil fertility,  
8                   cover-cropping, crop rotation, things that  
9                   NRCS can get behind and relate to, and we've  
10                  taken that and we're packaging that as the CAP  
11                  138.

12                  And so our goal ultimately is that  
13                  a producer might be able to go to NRCS, and  
14                  NRCS can help them fill out the CAP 138 and  
15                  the left over portions that NRCS can't help  
16                  with, the land use history, the record  
17                  keeping, the commingling and contamination,  
18                  the producer will still be responsible for  
19                  that portion, but after having gone to NRCS,  
20                  half of their OSP might be completed.

21                  And so it significantly cuts down  
22                  on what producers have identified as a barrier

1 to certification. And so we're really hopeful  
2 this is going to work. We've gotten pretty  
3 far with it so far, and we're packaging it and  
4 formatting it, and I'd love to get comments  
5 from more folks about what they think about  
6 this.

7 And then lastly I was asked to  
8 come and talk about soil conservation and  
9 erosion on organic farms. And before I get  
10 too far into this, I just want to acknowledge  
11 that I think this is a really sensitive topic.

12 The last thing I want to do here  
13 today is promote a stereotype that soil  
14 erosion is rampant on organic farms, because  
15 that is not at all my belief.

16 From my experience working with  
17 NRCS I do hear regularly from planners that  
18 it's an issue that they're seeing out in the  
19 field and they don't know how to address it.  
20 They don't want to be the regulators or, you  
21 know, the whistleblowers calling up certifiers  
22 and complaining. And so it's an issue that we

1 do need to address.

2 And additionally, NRCS has taken  
3 on a campaign, the Soil Health Initiative,  
4 talking a lot about minimizing erosion and  
5 cover-cropping. And so I feel like this topic  
6 is becoming much more talked about and  
7 discussed.

8 And folks who are looking to, I  
9 don't know, tear down organic often criticize  
10 it because of what might be excessive tillage  
11 on a very small number of farms. We don't  
12 know the scope of this problem, and so I want  
13 to acknowledge that from the very beginning.

14 That being said, I do want to talk  
15 about what's happening from the NRCS  
16 perspective and hopefully this will be the  
17 start of a much larger conversation.

18 So just to give a little bit of  
19 background, in the 85 Farm Bill there were  
20 provisions related to highly erodible land,  
21 and I will define that for you here in a  
22 second. It's pretty self-explanatory. But

1 basically, producers have to be in compliance  
2 with highly erodible land provisions to be  
3 eligible for some USDA programs.

4 And what that means is, is if  
5 they're farming highly erodible land, they  
6 have to agree to not plant or produce a  
7 commodity on it unless they are applying an  
8 approved conservation plan.

9 So the issue that I hear from NRCS  
10 and planners in the field is that sometimes  
11 they're going out to certify organic farms and  
12 they're out of compliance with this provision.  
13 And so that means they're being certified by  
14 an inspector in, you know, the NOP -- two NOP  
15 programs, and yet when NRCS goes out and runs  
16 the assessment tools, they're eroding at  
17 excessive rates. And so you can see the  
18 inconsistency that's happening there.

19 And so exactly what highly  
20 erodible land is, it's determined based on a  
21 number of factors of that particular piece of  
22 property. NRCS routinely makes determinations

1 about whether land is or is not highly  
2 erodible, and they can do so upon request.

3 So what that means, to be in  
4 compliance, it actually allows for twice the  
5 tolerable soil erosion of that -- of a basic  
6 conservation plan. So to be in compliance  
7 doesn't mean you're not eroding, it means  
8 you're eroding pretty significantly -- I'm  
9 sorry, to be out of compliance.

10 And when that's identified on a  
11 farm, the producer has up to a year to get  
12 into compliance working with NRCS. So there's  
13 support available to them.

14 So all that being said, I think  
15 this is a bigger topic than just what is  
16 highly erodible land and how often that  
17 specific situation is actually occurring. On  
18 my farm, it's nearly impossible for us to do  
19 no-till because we're farming vegetables. And  
20 it's very hard to plant a carrot seed into a  
21 no-till field.

22 We grow cover crops and we try to

1 build our soil organic matter because of that,  
2 but oftentimes there can't -- or I shouldn't  
3 say oftentimes -- there can be situations  
4 where tillage is relied on too heavily. And  
5 so as an organic community, I think this is a  
6 conversation we need to continue having and  
7 talking about.

8           And I posed some questions here  
9 for us to consider. A lot of these are  
10 mirrored in the memo that went out yesterday  
11 by the National Organic Program. Firstly, I  
12 think we need to figure out how big of an  
13 issue this really is. I know that ACAs are  
14 probably wanting more guidance on how to  
15 assess soil erosion, and how they're doing it  
16 to begin with, I think, is an important  
17 question.

18           Are visual assessments really  
19 enough once a year, if it's not during the  
20 rainy season. Maybe for some farms it is,  
21 maybe for some it's not. I don't know what  
22 the follow-up questions are that inspectors

1 are asking.

2 Also, does highly erodible land,  
3 or HEL determinants play into this  
4 conversation at all? Should producers have  
5 to report if they're farming highly erodible  
6 land to their inspector or to their certifier?  
7 And then how do ACAs determine if there's a  
8 non-compliance at all, what's the benchmarks  
9 that they're looking at?

10 And lastly another issue that I  
11 hear about from NRCS folks is in relation to  
12 outdoor access and if that's being required in  
13 situations where it might not be very  
14 appropriate because of soil conditions.

15 So, again, I want to reiterate I  
16 think this is an important conversation to  
17 have and hopefully this is just the starting  
18 point of it.

19 And this is -- actually I put this  
20 up again. This is a photo of our pasture  
21 field with a significant erosion problem in  
22 the middle. We just bought our land a

1 year-and-a-half ago. And so, even with the  
2 best intentions, issues occur. And  
3 fortunately we're working with NRCS to address  
4 this.

5 So that's all I have right now.  
6 And I'm open to any questions the Board might  
7 have.

8 CHAIR STONE: Very good. Thank  
9 you, Sarah. I know when the NRCS folks were  
10 at our farm they were scratching their head  
11 pretty good because we had laid black plastic  
12 and then we had planted rye grass and  
13 buckwheat in between the plastic. They'd  
14 never seen plastic with purposely planted  
15 grass between the rows. That's our way to  
16 keep RUSLE from implementing -- changing  
17 things on our farm.

18 So along that line, a lot of --  
19 the tech gods at NRCS can be fairly rigid in  
20 their requirements to meet those, and OSPs are  
21 purposely very not rigid. Is there  
22 conversation about coordinating those?

1 MS. BROWN: Yeah, Melissa and I  
2 have had a number of conversations about that.  
3 For instance, with NRCS and nutrient  
4 management, if you were to sign up for  
5 assistance for nutrient management as a  
6 practice, you have to complete a full nutrient  
7 management budget with very precise details on  
8 how that'll be implemented, much more details  
9 than are required on an organic system plan.

10 And so what that overlap looks  
11 like is difficult to figure out, and we don't  
12 feel like we can do it entirely. There might  
13 have to be some translation of information  
14 between the two worlds. But, I think we're  
15 getting close with this CAP plan, so.

16 CHAIR STONE: Good. Thanks.  
17 Maybe you can convince Mark to stick around  
18 for another year or so.

19 Jean?

20 MEMBER RICHARDSON: Hi. That was  
21 a great report. I'm all in favor of soil.

22 As an inspector, so we had

1 training with a certified -- one of the  
2 certifieds I was working with, Le Monde  
3 organic farmers, and so as inspectors, when we  
4 go out there we have some specific questions  
5 on the inspection report that we're required  
6 to fill out to send back as part of the -- our  
7 inspector report.

8           And I'd be interested to know if  
9 you've done any research or looked around to  
10 see which other certifying agencies around the  
11 country are -- have -- already have -- are  
12 doing this, are already having their  
13 inspectors trained to look for erosion.

14           And I'm wondering, this is sort of  
15 a two-part thing, is this something that our  
16 accreditation subcommittee should be looking  
17 at, or the crops subcommittee be looking at as  
18 part of a work plan item?

19           MR. McEVOY: Yeah, we just sent  
20 you a memo, Friday I believe, posted yesterday  
21 that we do want this to be a work plan item  
22 for the certification, accreditation and

1 compliance subcommittee. So it has some  
2 specific ideas in there and some questions in  
3 there, that we'd like this to be looked at.

4 In terms of the accreditation  
5 audits, it's already part of the audits. Is  
6 that it's one of the criteria to see that  
7 certifiers are evaluating compliance with  
8 205.200, 205.201, 205.202, all the different  
9 -- and 203 -- all the different elements in  
10 terms of meeting and improving natural  
11 resources and soil and water quality. So it's  
12 already part of the process.

13 I think what we're asking the  
14 subcommittee to do is to look -- and the Board  
15 to do -- is to look are there better tools,  
16 are there more tools that certifiers could be  
17 using, technical assistance that could be  
18 provided to organic producers and tools for  
19 evaluation to ensure that the -- those natural  
20 resources are conserved on all organic farms.

21 I just think it's an area that we  
22 haven't really looked at, the Board hasn't

1 really looked at. There's some real expertise  
2 on this Board currently to take a look at this  
3 with Francis here. What are the best  
4 practices for certifiers to utilize to  
5 evaluate those requirements.

6 CHAIR STONE: Francis.

7 MEMBER THICKE: Thank you, Sarah.  
8 As a soil scientist myself, I wanted to point  
9 out something that you're probably well aware  
10 of, is that often if you can set aside 10 or  
11 15 percent of the erodible land in buffer  
12 strips and waterways, grass waterways and so  
13 forth, in perennial crop you can -- perennial  
14 cover you can solve 90 percent of your problem  
15 by just a small, as you well know.

16 So I think of organic farms could  
17 really make a lot of progress in erosion if  
18 they would just use their diversity on areas  
19 that would help protect the soil. I think  
20 that's a really important thing.

21 CHAIR STONE: Zea?

22 MEMBER SONNABEND: Thank you.

1 Thank you for the presentation. When I  
2 started farming again three years ago, and I  
3 went over to talk to the NRCS agents when they  
4 were at my neighbors, and was told that we  
5 would not be eligible for any NRCS funding  
6 until we had had sales of at least \$1,000 for  
7 two years in a row.

8 And I don't know if this is a  
9 California thing or if it's nationwide, but  
10 isn't that an impediment to beginning farmers  
11 who haven't had sales for two years in a row?  
12 And I'm also wondering if that is only for  
13 funded projects, or applies to advice like  
14 about erosion control as well.

15 MS. BROWN: That is -- well, what  
16 they were referring to would be national  
17 guidelines, and that's no longer the case, and  
18 I'm not even sure they had interpreted that  
19 correctly for you. At this point, I believe,  
20 and I don't want to mis-speak, but I don't  
21 think that is a requirement any longer, that  
22 you have to have sold \$1,000 worth.

1                   And I know that beginning farmers,  
2                   there's additional financial assistance  
3                   available to that group. So -- and that  
4                   specifically was in regards to the EQIP  
5                   program. Technical assistance you should have  
6                   access to, regardless of your income at all.

7                   So, yeah, I -- one of my key  
8                   efforts has been to go around and work with  
9                   NRCS staff to make sure they know about what  
10                  organic is and how it's different implementing  
11                  a hedgerow on an organic farm, or factoring  
12                  cover crops and compost into a nutrient  
13                  management plan. And so, we still have some  
14                  work ahead of us in that regard.

15                  CHAIR STONE: Okay. Again, Sarah,  
16                  thank you very much for being here, and thank  
17                  you for your work, and there is a lot of  
18                  overlap there, so thank you.

19                  (General applause.)

20                  CHAIR STONE: Okay. We're going  
21                  to move in -- we're significantly behind  
22                  schedule, even though we took an hour off the

1 agenda, but, again, this is an important part  
2 of why we convene, and so we're going to start  
3 with public comment period.

4 Do we need a break? Thank you.  
5 We'll take a break. Let's do it at 15  
6 minutes, which is going to put us 45 minutes  
7 behind schedule, so we'll be back here at  
8 3:45.

9 (Whereupon, a short recess was  
10 taken.)

11 CHAIR STONE: Okay. If I could  
12 everyone start taking their seats, please. We  
13 need to get started on the public comment.  
14 We're going to be here a little bit late as it  
15 is.

16 (Pause.)

17 MALE VOICE: I second.

18 CHAIR STONE: Sure enough, if we  
19 could have everyone take their seat, please,  
20 so we can get started. I have a few prefacing  
21 comments, but I want those of you that are  
22 presenting, the -- we are running late, so

1 Board members, I'm going to be pretty  
2 scrutinizing in questions, if at all. I hate  
3 to do that, I don't want to do that, but we're  
4 going to run pretty late as it is.

5 So, first of all, we -- the Board  
6 always debates how much time can we devote.  
7 It depends on how many requests for sign-ups  
8 we have for public -- for oral comments. It  
9 was 87, 89, Michelle, somewhere in there, and  
10 as Miles mentioned this earlier, it's almost  
11 a third of the meeting that we devote to this.

12 So we as a Board don't think that  
13 it has more merit than written comments, but  
14 it is nice to hear it. I would recommend  
15 that those of you that have submitted written  
16 comments, that you submit something slightly  
17 different from the microphone, because, as I  
18 said, all the Board members scrutinize written  
19 comments very, very thoroughly.

20 So we did decide on four minutes.  
21 We have the little stoplight system that we  
22 implemented a little bit. When you see the

1 yellow light, that means you're down to a  
2 minute and you might start winding down.

3           Something we did in I guess it was  
4 in Portland. Someone, I'm sorry, I don't  
5 remember who it was, stopped exactly when the  
6 red light went on. They got a gift. We have  
7 gifts for the people that time it perfectly;  
8 your USDA mug.

9           And there's another person that  
10 stopped immediately in mid-word when the light  
11 turned red, so they get a gift as well. So we  
12 have organic t-shirts for those that -- and  
13 truthfully it's respect for the timing and for  
14 those that follow you on the program. So we  
15 appreciate your respect for the time.

16           We request that there's no  
17 substitutions. If you have comment or prep,  
18 if there's things like that, if you could do  
19 it outside just so it's not disruptive to the  
20 person commenting, there will be sort of an  
21 on-deck chair over there that Will is sitting  
22 in now, so that you can get to the podium and

1 reduce the time between.

2 We ask that you focus on the  
3 issues, not people, and, please, no personal  
4 attacks. And please don't interrupt each  
5 other. Again, we take this very seriously and  
6 we'd like the audience members to listen to  
7 each other's comments seriously.

8 And, again, questions only if you  
9 are acknowledged by the Chair to ask a  
10 question.

11 So with no further ado, Mr. Mark  
12 Kastel, you're up first. And Colin Archipley  
13 in on deck in the -- thank you.

14 (Pause.)

15 MR. KASTEL: And I already see the  
16 clock is going, and I want that mug, Mac, so  
17 restart it to six minutes. You got that  
18 ready? I'm supervising here. It doesn't even  
19 -- it starts at 3:54. It won't even start at  
20 three -- four minutes.

21 We're having a bit of a technical  
22 -- no, wait. I could -- I'll start and then

1 she'll catch up. That way I'll get extra  
2 time.

3 Thank you, Mr. Chairman. Why  
4 should citizens and public interest groups  
5 bother going to the effort of attending these  
6 meetings? When Cornucopia was founded 10  
7 years ago, our first mission was to force the  
8 USDA to crack down on industrial dairies, each  
9 milking thousands of cows each, that refused  
10 to graze their cattle.

11 We helped facilitate the  
12 attendance of scores of farmers over a period  
13 of years. We collaborated with NOSB members  
14 to craft language. It was actually -- it  
15 would be in force today. It would be good  
16 language if that was happening.

17 Today, the almighty authority at  
18 the NOP has seized control of this committee  
19 as a deliberative body. You will now only be  
20 allowed to discuss issues that they deem  
21 appropriate. This is dead wrong, and a  
22 violation of both the spirit and letter of the

1 Organic Foods Production Act of 1990.

2 Many of us involved in the 1980s  
3 who supported OFPA never would have done so  
4 without the safeguards built in, vis-à-vis the  
5 power vested in the NOSB. I'm glad that late  
6 last week Senator Patrick Leahy and  
7 Representative Peter DeFazio sent a  
8 strongly-worded letter of protest to USDA  
9 Secretary Vilsack condemning the unilateral  
10 power grab.

11 Mr. McEvoy, shame on you for  
12 either going along with this or, quite  
13 frankly, we don't know if you are the chief  
14 architect of this betrayal or you were just  
15 carrying it out. This is a turning point. We  
16 are headed to court. This is a nation of  
17 laws.

18 Your job, Mr. McEvoy, and that of  
19 your boss, Secretary Vilsack, is to implement  
20 and enforce the laws passed by Congress. The  
21 National Organic Program is willfully failing  
22 on both counts.

1                   Let me provide one example for the  
2                   NOSB and audience in terms of failure of  
3                   enforcement. As many of you know, Cornucopia  
4                   just refiled a formal legal complaint alleging  
5                   violations in the operation of a giant dairy  
6                   in Idaho that has been operated by Dean Foods  
7                   and WhiteWave.

8                   Reportedly, it milks cows three  
9                   and four times a day without allowing them  
10                  legal access to pasture. We filed complaints  
11                  against this dairy before, and based on FOIA  
12                  documents it appeared that the NOP had never  
13                  investigated.

14                  Why would some farms get  
15                  decertified, but others charged with similar  
16                  transgressions not? Why would Aurora Dairy be  
17                  found in violation of the law after they were  
18                  closely scrutinized, and why would the  
19                  powerful corporate lender -- I'm sorry, the  
20                  corporate leaders at Dean Foods and WhiteWave  
21                  be able to scoff at the law?

22                  We were recently told by the head

1 of NOP enforcement that you indeed did  
2 investigate by sending in the certifier,  
3 Quality Assurance International. Isn't that  
4 the fox watching the chicken coop?

5 QAI is the same certifier that  
6 certified Vander Eyk Dairy in California;  
7 10,000 cows, no pasture, decertified. QAI  
8 certified initially Shamrock Dairy; thousands  
9 of cows, no pasture, in the process of being  
10 decertified.

11 And the NOP trusts QAI to carry  
12 out the investigation? This is a gross  
13 betrayal of public trust. Consumers have to  
14 believe the organic law is being enforced.

15 Ethical dairy farmers are being  
16 crushed in the marketplace. Most of us in  
17 this room believe in the values that the  
18 organic movement was founded upon. We will  
19 not rest while we see the USDA attempting to  
20 partner with powerful corporate interests in  
21 changing the working definition of organics.

22 In closing, if the NOSB appointed

1 the director of the NOP as Congress mandated,  
2 he or she would be accountable to the organic  
3 community and this Board, not to politicians.  
4 Far less tumult and a stronger organic label.  
5 Thank you very much.

6 (General applause.)

7 CHAIR STONE: Thank you, Mark.  
8 That's pretty good.

9 MR. KASTEL: I get the mug now,  
10 Mac.

11 CHAIR STONE: Well, you have to  
12 wait till the end to see how the others do.  
13 Okay?

14 MR. KASTEL: Someone might be  
15 better and I --

16 CHAIR STONE: Someone might be --

17 MR. KASTEL: -- refer to them.  
18 Thank you.

19 CHAIR STONE: Okay. Good job.  
20 Thank you.

21 Okay. Colin Archipley, and please  
22 help me if I --

1 MR. KASTEL: I think there might  
2 be a question from one of your --

3 CHAIR STONE: Oh --

4 MR. KASTEL: -- colleagues, Mr.  
5 Chairman.

6 CHAIR STONE: Jennifer?

7 MR. KASTEL: I'm hard of hearing  
8 --

9 MEMBER TAYLOR: Thank you.

10 MR. KASTEL: -- Jennifer.

11 MEMBER TAYLOR: Thank you.

12 MR. KASTEL: Muscle right up to  
13 that microphone.

14 MEMBER TAYLOR: Okay. I was just  
15 wondering if, within all of the comments that  
16 you provided for us today, and thank you for  
17 speaking, what would be the most important  
18 issue that you would summarize?

19 MR. KASTEL: Okay. Well, I think  
20 the general, what I would call general power  
21 grab on the part of the USDA. We saw a visual  
22 demonstration today of dissatisfaction with

1 the organic community on the issue of the  
2 Sunsetting.

3 On one end, I was told by the  
4 Organic Consumers Association before they, you  
5 know, engaged in that activity, that they had  
6 80,000 consumers sign a petition, electronic  
7 petition stating their discomfort.

8 On the other end of the divide we  
9 have the elected board chairman of the Organic  
10 Trade Association call my colleagues at the  
11 Center for Food Safety, Food and Water Watch,  
12 and Consumers Union liars, and asking the  
13 organic community to get behind the organic  
14 program.

15 So, you know, whether -- whichever  
16 side of the fence you're on, this is a  
17 black-eye to organics, and is deleterious to  
18 our credibility in the eyes of consumers.

19 So, you know, I guess the three  
20 points that I'll make, number one, OFPA  
21 specifically states, and we saw this  
22 confrontation brought up by the motion that

1 Mr. Feldman brought forward to revert to the  
2 NOSB elected Board Chairman. OFPA is clear by  
3 saying, the NOSB will elect the chairman, and  
4 the chairman's responsibility is obviously to  
5 run this program.

6 The next I referenced is that the  
7 -- it's very clear in OFPA that the NOSB has  
8 the obligation, shall is the word, appoint the  
9 staff director, and then it goes into  
10 explaining how to staff the program.

11 And make no mistake about it, that  
12 is Mr. McEvoy's current position, because then  
13 it says that the duties of them are to carry  
14 out this Act, the Organic Foods Production Act  
15 of 1990.

16 So the last point that we'll make,  
17 and I think we'll present this in further  
18 testimony, is that OFPA specifically gives the  
19 authority to you and your colleagues to secure  
20 the -- to TAP reviews or the technical  
21 reports.

22 I can tell you that as the -- one

1 of the directors of the Cornucopia Institute,  
2 I cannot choose the auditors to -- for our  
3 non-profit public charity. That has to be  
4 done by the Board because the job of the  
5 auditor is to support our Board and critique  
6 the work of the management to make sure that  
7 it's ethical.

8 The reports from the technical  
9 review are not for the NOP. You folks have to  
10 have confidence that they're truly being done  
11 by qualified and independent individuals.

12 How can you do that when they go  
13 out and contract -- and in recent years since  
14 the Obama-Vilsack administration have taken  
15 over, the author's name -- and where does it  
16 -- where else does it occur in science -- the  
17 author's names of the technical reports are  
18 secret.

19 You don't even know who is  
20 producing those reports, so how do you know if  
21 you would have confidence in them enabling you  
22 to make these difficult decisions? There's

1 only one seat on this Board that's held by a  
2 "scientist". The rest of us in this room,  
3 most of us, are lay people.

4 Obviously Ms. Richardson, Mr.  
5 Thicke, both hold PhDs, they're scientists.  
6 A couple of our other academics are  
7 scientists. But that's not a prerequisite to  
8 hold many of these seats on the Board. You  
9 have to have trust and confidence.

10 CHAIR STONE: Thank you, Mark.

11 MR. KASTEL: Those are the points  
12 I'd like to make. Thank you for you're the  
13 opportunity Mr. Chairman --

14 CHAIR STONE: Okay. Thank you.

15 MR. KASTEL: -- Mr. Chairman.

16 CHAIR STONE: All right.

17 (General applause.)

18 MR. McEVOY: Yeah, just a couple  
19 of things there. Mac is the Chair of the  
20 National Organic Standards Board. I'm the  
21 Designated Federal Officer. We both have  
22 roles and responsibilities to play in this --

1 in how this meeting operates, how the National  
2 Organic Standards Board operates.

3 The other point is that there are  
4 84 accredited certifiers, they have certain  
5 responsibilities. They're responsible to do  
6 investigations to verify organic compliance.  
7 QAI is an accredited certifier.

8 And just like all the others,  
9 that's the process, is that the certifiers are  
10 accredited to do the work that they do, they  
11 do the investigations, they verify that all  
12 organic operations that are certified organic  
13 are in compliance with the regulations,  
14 including the Idaho dairy, including all the  
15 other names that were mentioned in the last  
16 person's testimony. Thank you.

17 MR. ARCHIPLEY: Good afternoon,  
18 Board. I'm here today to bring light  
19 discussion about soilless agriculture within  
20 the organic standards. The definition of soil  
21 in most dictionaries is the upper layer of  
22 earth.

1                   Now we already know many growers  
2                   in organic standards don't grow in the upper  
3                   layer of earth, some may, but usually spend  
4                   part of the life cycle outside of the upper  
5                   layer of earth using plugs and whatnot.

6                   So what is soilless agriculture?  
7                   Containers, plugs, hydroponics. Specifically  
8                   what is hydroponics? Hydro means labor, ponis  
9                   means water, so it's making the water do the  
10                  work for us. It's been used since the  
11                  beginning of agriculture. The Hanging Gardens  
12                  of Babylon, Floating Gardens of Aztecs and so  
13                  on.

14                  Modern hydroponics is kind of  
15                  defined by college students growing hippie  
16                  lettuce in their closet using synthetic  
17                  fertilizers and whatnot. But that does not  
18                  define us all, and there is a return to  
19                  hydro-organics.

20                  What is different about  
21                  hydro-organics systems compared to its  
22                  conventional hydroponic systems? The use of

1 organic inputs and standards, and the reliance  
2 of microorganisms to decompose organic matter  
3 to derive nutrients.

4 Exactly the same thing that  
5 happens in soils but in a contained system to  
6 include aquaponics, Dutch buckets, ceilings  
7 for plugs and so forth. The only difference  
8 is not using sand, silt or clay as a base for  
9 the microorganisms to grow.

10 And how do we do it on our farm?  
11 The of compost teas with worm casting fishing  
12 motions, no synthetic micro-nutrients or  
13 anything like that. We capture and  
14 recirculate the water.

15 The bottom line, for an area like  
16 us where water is \$2100 an acre foot, and land  
17 is in excess of \$100,000 per acre, yet the  
18 community of San Diego is saying, We don't  
19 want to buy food from Fresno, we want to buy  
20 it from our community.

21 This is a matter of survival for  
22 our type of agriculture. It's extremely

1 efficient, up to 90 percent more water  
2 efficient. Land of agriculture is at an  
3 all-time high, and with this form of  
4 agriculture, you can reduce your footprint and  
5 be profitable with only a few acres. We can  
6 convert parking lots, warehouses, reclaim  
7 industrial land for organics, roof tops and so  
8 forth.

9           The bottom line is, there's a  
10 misunderstanding of what the term  
11 hydro-organics, hydroponics means, and it  
12 shouldn't -- that misunderstanding should not  
13 disclaim us from all. We believe the pillars  
14 of the organic industry is microorganisms,  
15 organic matter, sustainability, and a crop,  
16 and we bring all those four pillars to the  
17 organic community.

18           And I'd like to throw my hat in  
19 the ring, try to be a member of the Board to  
20 bring light to the organic industry of what  
21 soilless agriculture is defined within keeping  
22 of the highest standards of the National

1 Organic Program. Thank you.

2 CHAIR STONE: Good. Thank you  
3 very much.

4 Karen, I've seen you follow this  
5 act before, so -- and Urvashi Rangan is next,  
6 on deck.

7 MS. MITCHELL-ARCHIPLEY: Okay.  
8 Hi, my name is Karen Archipley, and we're with  
9 Archie's Acres, and we're the Veterans  
10 Sustainable Agriculture Training Program.

11 And first I want to just wear my  
12 hat, I'm a Board member of CCOF, and I wanted  
13 to bring to your attention that we have  
14 written, on behalf of CCOF, a letter regarding  
15 the animal welfare standards, and that a  
16 cement porch is not outdoors.

17 So I want to put my other hat on,  
18 I'm going to go back to VSAT and what we're  
19 doing. And I want to say thank you to the  
20 USDA, because we transition active duty as  
21 well as veterans into sustainable organic  
22 agriculture, and with the new Farm Bill, it

1 has been great.

2 And I want to say that with San  
3 Diego -- my husband pointed out that water is  
4 \$2100 an acre foot, and that is brutal. And  
5 I can tell you that with organic --  
6 hydro-organic, we're able to not only survive,  
7 but thrive and bring organic food to areas  
8 where we can say, give us your worst land.

9 And if you have issues with water,  
10 we can come to that with a solution that  
11 actually produces up to three to five times  
12 the crop and has the tremendous nutrients  
13 within it.

14 And so I want to say thank you,  
15 make room for veterans that are coming out  
16 into organic sustainable ag. Today a veteran  
17 can use their VA home loan to buy a farm.  
18 That was not true a year ago. So we're really  
19 happy with our advocacy.

20 Second, organic sustainable  
21 agriculture is now a career track for all  
22 people leaving the military, all branches.

1 And so as you and the organic industry, please  
2 make room and support those transitioning  
3 veterans.

4 And I want to say thank you to all  
5 the companies that do support us, such as  
6 Whole Foods, Jimbo's. We've had Farmtek,  
7 Agritech, so many of the people that have  
8 reached out to not only employ, but to offer  
9 that learning concept of what organic  
10 agriculture is all about. So thank you for my  
11 time.

12 CHAIR STONE: Thank you very much.  
13 Thank you for your service for the organic  
14 community as well.

15 I have -- Urvashi is up, and Ram,  
16 you know, is on deck.

17 Terry, I'm letting Ram get on an  
18 airplane, so I'm sticking him in there. Thank  
19 you.

20 MS. RANGAN: Great. Thank you.  
21 Good afternoon. My name's Urvashi Rangan.  
22 I'm Director of Consumer Safety and

1 Sustainability for Consumer Reports. Our  
2 policy and action arm is Consumer's Union.  
3 And I'm glad to be here today to be able to  
4 make comments.

5 I also want to welcome Charlotte  
6 Vallaeys to our team at Consumer Reports, and  
7 she'll be making additional comments here  
8 today -- tomorrow on behalf of Consumer  
9 Reports.

10 So we're glad to be here today.  
11 There's so much to talk about, so we can only  
12 pick a few things. We're one of the many  
13 public interest groups who spend our time  
14 educating consumers about what labels mean and  
15 what they don't and where they fall short of  
16 consumer expectations.

17 And consumers have clearly  
18 demonstrated a willingness to pay more for the  
19 food that they believe is truly natural, and  
20 they will pay more for the organic label to  
21 get that. Their confidence in the label is  
22 actually paramount to its success. And

1 without a confident consumer, there isn't a  
2 successful organic program.

3 This is why Consumer Reports and  
4 so many other public interest groups have  
5 remained vigilant in advocating for  
6 maintaining the integrity of this label and  
7 the process for reviewing materials. And we  
8 agree with the many comments made here today  
9 by Jay Feldman.

10 We believe that the National  
11 Organic Program is not protecting the label as  
12 it should. We believe the decision to allow  
13 prohibited substances that were granted  
14 five-year listings to, by default, remain on  
15 the list if two-thirds of the NOSB does not  
16 vote them off, is a perversion of the intent  
17 of the law.

18 And there will be no incentive for  
19 natural alternatives to be developed on a  
20 commercial scale, which is already a problem.  
21 This is a slap in the face of the organic  
22 label, and to consumers who pay more for it.

1                   And while the NOP believes this is  
2                   an invalid opinion and that our raising  
3                   awareness of this issue is detrimental to  
4                   organic, which we've been told, we  
5                   respectfully disagree. And the authors of the  
6                   organic law echo that sentiment. In their  
7                   letter they say,

8                   "Therefore, it is with great concern  
9                   that we learned about the policy change  
10                  implemented by your agency this past  
11                  September, which turns the Sunset policy of  
12                  OFPA on its head."

13                  And you can read the rest of that  
14                  letter, and it's pretty damning in terms of  
15                  what this interpretation is.

16                  You've questioned the  
17                  qualification, the quality of surveys in the  
18                  past two consumer surveys, but I'm here to  
19                  actually present the results of an independent  
20                  Consumer Reports national research survey  
21                  that's been released today with many findings  
22                  of what consumers think about the organic

1 label.

2 And here's some of the highlights.  
3 Regarding the use of artificial ingredients in  
4 organics, 71 percent of consumers want as few  
5 artificial ingredients as possible approved in  
6 organic production.

7 If they are approved, 84 percent  
8 say that the use of artificial ingredients  
9 should be discontinued if not reviewed after  
10 five years. And interestingly, 44 percent of  
11 consumers think a five-year time frame is  
12 actually too long.

13 We believe that the NOP  
14 interpretation of Sunset is wrong. It weakens  
15 the organic standards by making it far easier  
16 for exempted and prohibited materials, which  
17 is what these are, to remain on the National  
18 List in perpetuity. This is not in line with  
19 consumer expectations, or the authors of the  
20 organic law, and it will cause serious damage  
21 to the integrity of the organic label.

22 Regarding the use of streptomycin,

1 while only 66 percent of consumers think that  
2 no antibiotics were used on organic fruits and  
3 vegetables, 86 percent don't want them used.  
4 We believe that you should not extend the  
5 period allowed for streptomycin use.

6           Regarding antibiotic use in other  
7 places in organic, because we just stumbled on  
8 this, 88 percent of consumers believe organics  
9 should not allow the use of antibiotics,  
10 including at the egg stage, or at day one of  
11 life in terms of poultry production.

12           And regarding aquaculture, we do  
13 not believe you should be approving materials  
14 for aquaculture before you actually have  
15 standards. We need a strong organic label  
16 where the privilege of granting exemptions for  
17 otherwise prohibited substances is made with  
18 care and with the intent that they will not  
19 remain on in perpetuity.

20           We believe the NOP's reasoning is  
21 flawed, and we will continue this fight until  
22 it is resolved. Thank you.

1 (General applause.)

2 CHAIR STONE: Thank you, Urvashi.  
3 Jay?

4 MEMBER FELDMAN: Thank you, Mr.  
5 Chair.

6 Hi.

7 MS. RANGAN: Hi.

8 MEMBER FELDMAN: I really want to  
9 ask you to give us a little more detail about  
10 your study designs and how Consumer Reports  
11 and Consumers Union develops a study and the  
12 meaningfulness of that relative to the  
13 information that's available to a board like  
14 this to make informed decisions around  
15 consumer preference, consumer expectation,  
16 which is a key tenet in the final rule and the  
17 operations of this Board.

18 It really pains me sometimes when  
19 I hear people dismiss the quality of the data  
20 that your organization has historically  
21 generated for this -- for the nation. So if  
22 you could help us with that, I would really

1 appreciate it. Thanks.

2 MS. RANGAN: Yeah. Thank you,  
3 Jay. In fact, our national survey center  
4 actually runs some of the largest surveys --  
5 next to the census, we're the largest  
6 independent group actually running surveys out  
7 in the nation.

8 And there is a science behind  
9 surveys. And, in fact, I think it would be  
10 really beneficial, because of some of the  
11 frankly ludicrous claims made in these meeting  
12 rooms about the preposterousness of consumer  
13 survey data made by consumers is ridiculous.  
14 There is a science behind it, you can do them  
15 well, and you can do them not well.

16 And we have an entire department  
17 filled with PhDs that actually work to create  
18 these questions and craft them. It's really  
19 important how you craft them, how you craft  
20 the questions, that they are not leading. We  
21 have scientists working on just that. That's  
22 their full-time job and we have an entire shop

1 of them.

2 In addition to that, the way we  
3 administer those surveys matter, and it  
4 matters how they're administered. There's  
5 telephone polls, there's online polls. You  
6 have to have enough people to get a  
7 statistically representative sample, and you  
8 have to have the demographic cross-section so  
9 that you know that those are nationally  
10 representative.

11 These are just some examples of  
12 all of the different scientific criteria that  
13 we use before we even put a survey out into  
14 the field. The results of those surveys are  
15 bonafide, they are statistically significant,  
16 we stand behind them, our entire organization  
17 does.

18 And I think it might be really  
19 beneficial at some point for this group -- I'd  
20 be happy to bring on any one of our staff  
21 members to make a presentation to you about  
22 what makes for a scientifically sound survey,

1 and we'd be very happy to bring that to you.

2 CHAIR STONE: Thank you. Thank  
3 you very much.

4 MS. RANGAN: Thank you.

5 (General applause.)

6 CHAIR STONE: So Ram is up, and if  
7 you will state your name for the record, maybe  
8 they'll understand why I didn't state your  
9 name.

10 And Terry Shistar's on deck.

11 MR. BALASUBRAMANIAN: Thank you  
12 very much for the opportunity, Mr. Chairman.

13 I am Ram; my full name is Ramkrishnan

14 Balasubramanian, since Mac asked about it.

15 I'm the QCS Chief Operating Officer. QCS is  
16 one of the accredited certifiers based in

17 Gainesville, Florida. We're also accredited  
18 to do organic aquaculture under the European  
19 Union and Canada.

20 We certified several aquaculture  
21 and aquaponic operations, and, in fact, we are  
22 the only US-based certification body to do

1 GlobalGap food safety for aquaculture.

2 Needless to say, I'm here to talk about  
3 aquaculture.

4 The Board is moving in the right  
5 direction, and we fully support the efforts to  
6 include the materials as a part of the  
7 standards. That is always the question,  
8 whether it is wise for the NOSB to recommend  
9 materials when the standards are not  
10 finalized.

11 We think it is a wise move to  
12 include, based on the recommended aquaculture  
13 standards. This will enable the industry to  
14 start when the standards are out and don't  
15 have to wait on these materials.

16 Should there be changes in the  
17 final rule, the NOP can always send the  
18 materials back to the committee, and just  
19 because the NOSB approves these materials does  
20 not mean the NOP has to adopt them. I'm  
21 confident, if the materials recommended are  
22 not consistent with the final rule, the NOP

1 will not include these materials and send it  
2 back to the NOSB.

3 We have waited painfully long for  
4 these standards to come out. In 2003, QCS  
5 used to certify under the USDA livestock  
6 standards. The USDA permitted this at that  
7 time. Two operations, one in Permian, Texas  
8 and one in Florida, both growing shrimp were  
9 certified to the USDA organic standards.

10 Around 2005 both operations were  
11 voluntarily requested to surrender their  
12 certificates, and the reason is, if the USDA  
13 allowed the fish to be certified under the  
14 livestock standards, hardly two or three  
15 species would ever be certified as organic.  
16 And some species, such as salmon, could never  
17 be certified.

18 The operator understand, and the  
19 understanding at that time is the USDA is  
20 going to come back with a rule as soon as  
21 possible. Ten -Twelve years have passed.  
22 The rules are still not out there.

1                   The operator has been bankrupt.  
2                   These are US-based operations. They're  
3                   bankrupt because they couldn't compete against  
4                   some of the ceremonial standards. To give an  
5                   example, some of the ceremonial standards out  
6                   there, even today, allows one-third of the  
7                   animal's aquatic lifetime to be under  
8                   non-organic management.

9                   If you take shrimp, 120 days is  
10                  the average days you're supposed to be  
11                  harvesting it. Thirty days can be under  
12                  non-organic management, plus can be fed with  
13                  terrestrial animal byproducts. So these  
14                  operations could not compete; subsequently  
15                  went bankrupt.

16                  Currently operations that are  
17                  certified to other national-international  
18                  organic standards can produce their organic  
19                  product as organic. In doing comparison  
20                  against other standards, we believe the  
21                  standards recommended by NOSB is much better.

22                  And given all the circumstances,

1 we strongly urge the Board members to move  
2 forward in including these materials. It is  
3 very delightful to hear your stating that  
4 there'll be proposed aquaculture rules out by  
5 the end of the year. We support all the  
6 materials petitioned to be awarded in favor of  
7 being included in the final standards.

8           One comment about carbon dioxide  
9 that has been petitioned. QCS is very much  
10 aware it is a synthetic carbon dioxide.  
11 Carbon dioxide in the petition has dual  
12 purpose, digestive pH and also as a nutrient.

13           Two places this material, carbon  
14 dioxide, is used. To produce microalgae to  
15 feed the aquatic animals. Almost all  
16 commercially cultivated aquatic species  
17 consumes microalgae as a feed during their  
18 juvenile stage. It'll be used if the final  
19 rule requires integrated multitrophic  
20 aquaculture.

21           So the question is, given the fact  
22 that carbon dioxide can also be a macro

1     nutrient, can aquatic plant producers can live  
2     with all that. The answer is maybe. You can  
3     use aeration, you can grow in large ponds and  
4     perhaps use calcium bicarbonate for pH  
5     adjustment, but there are severe economic  
6     consequences.

7                     That process has not been  
8     standardized. The cost of production is going  
9     to go up and it's almost impossible to do it  
10    with only carbon dioxide. Thank you.

11   Questions?

12                     CHAIR STONE: Thank you, Ram.

13                     Jay?

14                     MEMBER FELDMAN: Well, I'll defer  
15    if anybody else has questions.

16                     (No response.)

17                     MEMBER FELDMAN: Thank you. I had  
18    a couple of questions about these materials.  
19    So are you suggesting that the CO<sub>2</sub> is used as  
20    a nutrient source?

21                     MR. BALASUBRAMANIAN: All right.

22    Sorry.

1                   MEMBER FELDMAN:  Yes.  And what  
2                   about the chlorine.  The chlorine -- do you  
3                   use it in culture water as well as for  
4                   cleaning --

5                   MR. BALASUBRAMANIAN:  Culture  
6                   water has to be sanitized for grow in  
7                   pathogens, but it is no different than  
8                   treating any other water treatments, like we  
9                   do in processing plants that needs to treated.  
10                  That's all.  It has no other effect other than  
11                  sanitation in culture water.

12                  MEMBER FELDMAN:  Okay.  Thank you.

13                  CHAIR STONE:  Thank you, Ram.

14                  Oh,  I'm sorry.  Jean?

15                  MEMBER RICHARDSON:  My apologies.

16                  I'm trying to keep track of the public  
17                  comments from the list that we have, and I  
18                  don't see the name of the organization that  
19                  you're with, Ram.  If you could help me --

20                  MR. BALASUBRAMANIAN:  Quality  
21                  Certification Services.  If you know Marty,  
22                  I'm with Marty.

1                   MEMBER RICHARDSON:  So -- oh,  
2                   okay.  All right.  Great.  Thank you.

3                   CHAIR STONE:  Okay.  Thanks, Ram.

4                   MR. BALASUBRAMANIAN:  Thank you.

5                   CHAIR STONE:  You can get your  
6                   plane.

7                   Terry Shistar, and Sharon Donovan  
8                   is on deck.

9                   (Pause.)

10                  DR. SHISTAR:  Okay.

11                  CHAIR STONE:  Okay?

12                  DR. SHISTAR:  Okay.  My name is  
13                  Terry Shistar, and I'm on the Board of  
14                  Directors of Beyond Pesticides.  And these  
15                  slides should be advancing automatically.

16                  (Pause.)

17                  DR. SHISTAR:  Beyond Pesticides  
18                  has a long history of involvement with organic  
19                  production.  Our roots are in the problems of  
20                  agriculture from poisoning of farmer workers  
21                  to contaminated food, soil, air and water.

22                  We are a committed organic

1 production, and the organic model in  
2 non-production situations as a solution to  
3 pollution. On this slide you can see some of  
4 our present and former board members.

5 I want to talk about precedence,  
6 particularly about setting bad precedence,  
7 which seems to be happening here now. The  
8 most significant bad precedent that is being  
9 set at this meeting is the overthrow of a  
10 democratic process for establishing organic  
11 policy by an agency with a history of  
12 antagonism towards organic production.

13 It was no accident that the NOSB  
14 was given powers beyond those of the usual  
15 FACA board. Until now, the Board has provided  
16 direction to the organic program from the  
17 organic community as a whole. I'm afraid that  
18 the future of the organic label depends on  
19 your finding a way to restore democratic  
20 control. Compared to that big issue, the  
21 other bad precedence are relatively minor.

22 Listing aquaculture materials

1 without having an understanding of the  
2 diversity of aquaculture systems or  
3 regulations in place defining organic  
4 practices in aquaculture would be a terrible  
5 precedent.

6           The petitions for aquaculture  
7 materials request the approval of a whole slew  
8 of synthetic materials for use on a routine  
9 basis. This is a bad precedent on a different  
10 scale than that of approval of formic acid in  
11 aquaculture.

12           The fact that the NOP passed on to  
13 the NOSB a petition for vinasse that redefined  
14 the material, lumping together synthetic and  
15 non-synthetic forms together under one name  
16 was a bad precedent from a materials review.

17           Much confusion could have been  
18 avoided if the NOP had recognized that the  
19 petitioner was petitioning a mixture of  
20 formulations that was turned down by MROs  
21 because of the synthetic additives. The NOP  
22 should have sent the petition back to the

1 petitioner as inappropriate for NOSB  
2 consideration.

3 We support efforts to clarify the  
4 roles of the NOSB and MROs with respect to  
5 generic substances and formulated materials or  
6 mixtures.

7 With respect to another crops  
8 material, laminarin, another bad precedent is  
9 in the works. The manufacture of laminarin  
10 involves the addition of sulfuric acid, which  
11 is neutralized by the addition by the sodium  
12 hydroxide, thus creating a net addition of  
13 sodium sulfate.

14 The crops subcommittee ignores the  
15 sodium sulfate, treating the neutralization as  
16 a removal step. That is bad -- it would be a  
17 bad precedent to endorse that. It would also  
18 be a bad precedent to endorse OMRI's position  
19 that the sodium sulfate, which it acknowledges  
20 must be reviewed, is acceptable because it is  
21 a list for inert. We are moving away from  
22 giving "inert" special status.

1                   The theory put forth by the  
2                   handling committee that the boiler chemical  
3                   PGME is not required to be on the National  
4                   List because it makes no contact with organic  
5                   products would establish another bad  
6                   precedent. OFPA makes it clear that the use  
7                   of the material, not the contact with the  
8                   food, determines the need for its listing.

9                   This is supported by the fact that  
10                  the NOSB must consider other factors like  
11                  essentiality and the probability of  
12                  environmental contamination during  
13                  manufacturer use, misuse or disposal that  
14                  apply regardless of food contact.

15                  Too big to fail is bad economic  
16                  policy and that's bad organic policy. We urge  
17                  you to correct past bad precedents and to  
18                  avoid making the same mistakes with  
19                  aquaculture.

20                  Well, you know what I was going to  
21                  say about Sunset.

22                  (General applause.)

1 CHAIR STONE: Thank you, Terry.

2 That was an effective presentation.

3 Oh, Calvin?

4 SECRETARY WALKER: Dr. Shistar,  
5 could you tell me what is your views on  
6 Sunset?

7 DR. SHISTAR: Well, what I was  
8 going to say is we all know what Sunset means.  
9 It means that the exemption goes away unless,  
10 upon thorough reconsideration, it is voted to  
11 stay.

12 We urge you to ensure that every  
13 substance on the National List receive  
14 rigorous review before relisting by attaching  
15 an annotation for a five-year expiration date  
16 to every petition material, and approving our  
17 petitions for annotation with an expiration  
18 date of those substances currently in Sunset  
19 review.

20 And besides that, you know, I've  
21 submitted other comments.

22 CHAIR STONE: Good. Thank you,

1 Terry. Thank you very much.

2 Sharon Donovan is up, and Melody  
3 Meyer on deck.

4 (Pause.)

5 MS. DONOVAN: Good afternoon. My  
6 name is Sharon Donovan. I'm from Des Moines,  
7 Iowa, and I represent Occupy the World Food  
8 Prize. Our goal is to encourage the world  
9 food prize to give fair and balanced  
10 representation to sustainable and organic  
11 agriculture. We are the people's answer to  
12 the world food prize and its big ad program to  
13 replace nature with chemicals.

14 It was no surprise to us that big  
15 ag would use their influence that resulted in  
16 the decision by the USDA, supported by the  
17 Organic Trade Association, to engineer the  
18 downgrade of organic standards.

19 This alarming reversal of the  
20 Congressionally mandated directive is a  
21 shocking misuse of power. But it is much  
22 more, and let me make this very clear. It is

1 a movement by corporate interests to control  
2 food policy. The lowering of organic  
3 standards in the US is just one part of a  
4 bigger picture.

5           There are more examples. The  
6 World Food Prize winners are not announced at  
7 the Department of Agriculture. They are  
8 announced by the US Secretary of State,  
9 because big ag directs our foreign food  
10 policy, working alongside the Rockefeller  
11 Foundation and the Ford Foundation, influenced  
12 by our old friend, Harry Kissinger, who is  
13 reported to have said, If you control the  
14 food, you control the people.

15           Corporations like Monsanto and  
16 Syngenta, DuPont and their co-conspirators,  
17 manipulate our foreign policy to serve their  
18 profit-driven agenda to control seeds, lands  
19 and market.

20           In 1999 when a Monsanto vice  
21 president was asked what his company's goal is  
22 for the 21st Century, he's reported to reply,

1 Control all seeds in the world. When our  
2 French scientist, Professor Gilles Seralini,  
3 and his team published his rat study in the  
4 Food and Chemical Toxicology Journal, it was  
5 withdrawn shortly after a Monsanto lobbyist  
6 joined the Journal's editorial board.

7 Paul Bremmer, perhaps you remember  
8 him, and big ag pushed through the 100 orders  
9 to transfer Iraq's economy into private US  
10 hands. Order 81 stands out. It forced Iraq's  
11 farmers to plant only what was called  
12 "protected crop varieties". Thus, one of the  
13 world's oldest agricultural traditions was  
14 destroyed.

15 Now, Iraqis are obliged to  
16 purchase seeds, fertilizers, pesticides,  
17 herbicides to feed their people. The seeds of  
18 course are GMOs. Do you see a pattern here?

19 Today in our backyard corporate  
20 profit drives the motive to lower organic  
21 standards through cover up, intimidation and  
22 lies. This is much more than a fight for what

1 is in our food. This is a fight against  
2 dominance and greed. We all know this, but  
3 Occupy wants it on the record.

4 Occupy appeals to you to please  
5 stand strong. Please respect the integrity of  
6 organic foods. Reject Secretary Vilsack and  
7 his political degradation of organic  
8 standards, and the power hungry, profit-driven  
9 corporate corporations would have given us  
10 each an orange, PCBs, VDT, GMOs and now what  
11 could become a growing list of synthetic  
12 materials added to our own organic foods.  
13 Thank you.

14 (General applause.)

15 CHAIR STONE: Thank you. Thank  
16 you for being here. Thank you very much.

17 Melody Meyer is up, and Michael  
18 Sligh is on deck. Melody?

19 MS. MEYER: Thank you. It's a  
20 pleasure to be here. I want to thank the  
21 Board for all your work and dedication.

22 I'm Melody Meyer from UNFI, and I

1 want to talk about something completely  
2 different. I want to bring forward a new  
3 emerging technology called synthetic biology  
4 that is quite possibly in the organic food  
5 supply and the organic production right now,  
6 and urge this Board and NOP to consider  
7 looking at it and reviewing it.

8           It's synthetic biology, and I  
9 won't go into the definition, you know, a lot,  
10 but it's sometimes called syn-bio or  
11 synthetically modified organism, and it's an  
12 extreme form of GMO. It's the next step.

13           And it's basically taking DNA  
14 strands, putting them together to create a  
15 separate entity that's never been alive on the  
16 planet; it's a new entity, injecting that into  
17 algae or bacteria or yeasts and growing  
18 things like synthetic vanilla.

19           These synthetic vanilla is  
20 actually on the market now and being marketed  
21 to companies in Expo East. When I was there,  
22 there were companies out there looking to get

1 this into the supply, call it natural. Should  
2 it be organic? I don't think so.

3 It's thoroughly untested, it's  
4 unregulated, it's unlabeled, just like GMOs.  
5 So there's the possibility that this could be  
6 entering the food supply now, the organic food  
7 supply without us knowing it, and we may be in  
8 a catch-22 where we have to catch up with this  
9 emerging technology.

10 The research and development is  
11 huge, it's growing by 41 percent a year. It's  
12 estimated to be \$16.7 billion in 2018. This  
13 is something that I believe that the Board and  
14 NOP should pay attention to.

15 The focus has been on chemicals  
16 and fuels, but now they're targeting tropic  
17 commodities and we really don't know the  
18 effects that it will have on the environment  
19 if these algae and use that exist everywhere,  
20 if there's biocontamination. The effects, the  
21 economic effects to small organic growers in  
22 subtropic regions is profound, and quite

1 frankly the effects of our consumer group, if  
2 this is in organic items will be also  
3 profound.

4 So I want to urge this Board and  
5 the NOP to take a look at this. And  
6 specifically with flavors because synthetic  
7 vanilla it out there and there are many more  
8 products coming.

9 So there's more information in my  
10 written comments. I'll be emailing those to  
11 you, and there's resources at the bottom of  
12 that if you have any questions. I have other  
13 resources. I'm certainly not an expert on  
14 this, but I know enough that it's scary.

15 CHAIR STONE: Zea?

16 MEMBER SONNABEND: Thank you,  
17 Melody. Why would you think it would be in  
18 organic food now when we require non-GMO  
19 declarations and you say it's a GMO, so how  
20 could they possibly give a non-GMO  
21 declaration?

22 MS. MEYER: It's not --

1                   MEMBER SONNABEND:  And along --  
2                   also, why wouldn't our current policy against  
3                   GMOs apply to this, that we would have to do  
4                   a separate looking into it?

5                   MS. MEYER:  The way I understand  
6                   it is, because of the fermentation process  
7                   that goes on with the algaes, it's not  
8                   considered a GMO product.  And there aren't  
9                   any labels or -- well, there's no way to  
10                  identify it.

11                  CHAIR STONE:  Jay?

12                  MEMBER FELDMAN:  Thank you for  
13                  your testimony.  Here's the things I'd like  
14                  your advice on, currently -- in the past when  
15                  someone like yourself or the environmental  
16                  community came to this Board and said, There's  
17                  a problem you're not addressing -- I'll give  
18                  you the example of nanotechnology -- the Board  
19                  took that information, studied it, did a  
20                  discussion document and put it on its work  
21                  plan, it was voted on by the Board.

22                  We have -- you've heard today

1 obviously that the whole policy has changed.  
2 The Board does not control its work plan.  
3 This is an issue that environmental groups  
4 have approached me on.

5 What would be your suggestion to  
6 this Board as to what it should do, and how  
7 could it collaborate with industry to make  
8 this an issue that in effect compels the USDA  
9 to bring this to the NOSB? Do you have any  
10 thoughts on that?

11 MS. MEYER: Well, I'm here  
12 speaking to the NOP as well so that they hear  
13 this message and it can come down to the NOSB  
14 as a priority.

15 MEMBER FELDMAN: Okay.

16 CHAIR STONE: Very good. Thank  
17 you for bringing that to our attention.

18 Calvin?

19 SECRETARY WALKER: Did I hear you  
20 right, that you represent Occupy? Is that an  
21 environmental group? Could you explain?

22 MS. MEYER: No, I'm just an

1 interested citizen in this.

2 MALE VOICE: UNFI.

3 SECRETARY WALKER: Oh, okay. I  
4 thought I heard Jay said environmental group,  
5 and it's always good to see other groups. So  
6 I thought he had mentioned that you were an  
7 environmentalist.

8 MALE VOICE: No.

9 SECRETARY WALKER: Sorry.

10 MS. MEYER: Thank you.

11 CHAIR STONE: Thank you, Melody.

12 Michael Sligh is on deck and Jake  
13 -- I mean Michael is up and Jake's on deck.

14 MR. SLIGH: Well, Southerners do  
15 get five minutes. Right?

16 CHAIR STONE: Well, it's going to  
17 be four, but it's going to sound like five.

18 (General laughter.)

19 MR. SLIGH: And many thanks to the  
20 Board and the NOP for all their service to the  
21 organic community. As a native son of the  
22 Alamo, I'm honored to have this event here.

1 We fully support the need for ongoing USDA  
2 organic policy advisors.

3 I'm here both as a voice from the  
4 past, as well as in defense of the future. As  
5 one of the commercial scale organic farmers  
6 back in the 1970s, we understood that organic  
7 could not grow to its real potential unless we  
8 could protect the consumer trust by creating  
9 greater consistency across state and national  
10 lines.

11 However, we also knew it would  
12 require a program that was fully defensible  
13 and could meet the ongoing expectations of our  
14 community. It took three tries to pass  
15 federal legislation. By then polls were  
16 already showing 84 percent of the consumers  
17 wanted to buy organic food and over half were  
18 willing to pay more.

19 This is still the case, and supply  
20 still lags behind demand. How we as a  
21 community and you as our representatives  
22 address this challenge will determine the

1 future integrity and viability of organics.

2 And I may be an old rat at the  
3 barn, but I think it's important for us to  
4 step back right now and take stock of how we  
5 had gotten here and whether we are going in  
6 the right path now. This is our legacy, and  
7 our responsibility to pursue the real promise  
8 of organic. It is more than what we've  
9 managed to codify so far. And it's our job to  
10 build upon that solid foundation.

11 However, it's important to realize  
12 the context of OFPA and why it was written  
13 exactly as it was. We must admit that this  
14 was a shotgun marriage from the very  
15 beginning, one that has required ongoing  
16 marriage counseling with every single Board,  
17 with every single administration regardless of  
18 party.

19 In order for the OFPA to pass and  
20 gain community support, it was critical to  
21 build in the power-sharing into the law and  
22 maximize the community roles. The

1 Congressional intent was to severely limit  
2 USDA discretion. USDA was not to reinvent the  
3 wheel. This was written as a partnership.

4 This Act did break new ground for  
5 the federal government and requires ongoing  
6 unique regulatory scheme. The NOSB has always  
7 been more than a regular FACA, FACA does not  
8 trump the OFPA. We would not be here today if  
9 that was not the case.

10 It is important to remember that  
11 we're all here as volunteers. We don't work  
12 for USDA, we're not employees. Your job is to  
13 cooperate, to consult, to give your best  
14 advice to the Secretary, to listen to the will  
15 of the community and to be faithful stewards  
16 of the spirit and the letter of the law.

17 This is not about any of us that  
18 are here today. This is not even personal.  
19 This is about ensuring the institutional  
20 balance of powers and checks and balances that  
21 were envisioned in the statute. We cannot  
22 afford ongoing polarization. We do so at our

1 peril.

2 No matter how efficient, no matter  
3 how well intended, major changes without  
4 public comment and without public Board  
5 deliberations is a breakdown of our  
6 partnership. For all of us who have given the  
7 bloom of our youth to this, we must rise to  
8 protect this institutional partnership.

9 I fully support the recent letter  
10 by the co-authors of the law clarifying the  
11 Sunset. We know that making sausage in public  
12 is not always pretty; it is messy. But if  
13 done right, it can fry up something tasty.

14 We should not change the course  
15 without the consultative due process. USDA  
16 should not unilaterally set the scope of the  
17 goals. This kind of change in the wrong hands  
18 could cause much mischief.

19 It's not too late to get it right,  
20 if we can honor where we came from, share the  
21 power, and keep the process open. It is our  
22 responsibility to the future. Thank you.

1 (General applause.)

2 CHAIR STONE: Thank you, Michael.  
3 Colehour?

4 MEMBER BONDERA: Thank you,  
5 Michael, for your comments. I want to ask you  
6 if you can get a teeny bit specific from your  
7 history with this and your opinions in terms  
8 of -- I mean I guess I'll ask it this way,  
9 which is like you said, OFPA -- we aren't a  
10 basic typical FACA.

11 MR. SLIGH: Right.

12 MEMBER BONDERA: And I think that  
13 we all can recognize that. But like the  
14 program has identified, there has to be some  
15 kind of bottom line, there has to be  
16 somewhere. And my question I think would be,  
17 how practically, logistically can the NOSB be  
18 meeting its higher standards than a regular  
19 FACA in practice?

20 What would be added or done? I  
21 think the good relationships and the  
22 collaborative work is a general good concept,

1 but what could be put into action that would  
2 differentiate or meet the statute better?

3 MR. SLIGH: Well, I mean I think,  
4 you know, the term partnership is what we have  
5 always operated on. And when I was in your  
6 seat, we would collaborate in developing the  
7 agenda, we would hear the Department's needs  
8 and what their constraints were, we would  
9 balance that against the needs of the  
10 community and come to a reasonable agreement  
11 on how to propose joint work moving forward.

12 Unilateral decision making is not  
13 going to work with a hyper-participatory  
14 community. We have to engage it robustly.  
15 And you as a Board need to do your part to  
16 ensure that you're bringing forward what you  
17 think is the most important priorities that  
18 have to be addressed. But you also have to  
19 carefully listen to the Department as to what  
20 their constraints are.

21 But without that, what we end up  
22 with is either failing to meet the demand of

1 the community, or leaving USDA in a lurch.  
2 And so it's the middle ground, the  
3 partnership, the dialogue that got us here.  
4 That was really -- you know, in the beginning  
5 we had no staff, we had no budget, but we had  
6 a mandate. And if we had of said, Gee, we  
7 don't have a budget and we don't have a staff,  
8 I guess we can't do anything, we wouldn't be  
9 here today.

10 So you -- even though you have to  
11 recognize the constraints of the Department,  
12 your vision and your mandate has to be bigger  
13 when what the current

14 capacity is, and continue to drive that  
15 process forward.

16 CHAIR STONE: Thank you very much,  
17 Michael.

18 MR. SLIGH: Sure.

19 CHAIR STONE: Well stated.

20 Jake Lewin is up and JoAnn  
21 Baumgartner is on deck.

22 (Pause.)

1 CHAIR STONE: Jake?

2 (No response.)

3 CHAIR STONE: I saw him in the  
4 back a minute ago. JoAnn, if you don't mind  
5 to go ahead, and we'll plug Jake back in in a  
6 minute.

7 After JoAnn will be Lauren  
8 Bernick. And please correct your  
9 pronunciation if I get it wrong.

10 (Pause.)

11 MS. BAUMGARTNER: Oh, oh, for a  
12 minute -- hi, I'm JoAnn Baumgartner with the  
13 Wild Farm Alliance. We promote healthy viable  
14 agriculture that protects and restores wild  
15 nature.

16 This winter the NOP webpage  
17 declared in their first bullet that organic  
18 farms and processors preserved natural  
19 resources and biodiversity. This is good.  
20 It's also good to hear that the NOP is  
21 collaborating so closely with the NRCS.

22 But there are a few troubling

1 issues the NOSB can engage in by following  
2 through on the biodiversity discussion  
3 document that was addressed in the fall 2012  
4 NOSB meeting by then Chair Barry Flamm.

5 A decade after the NOP regulations  
6 were created, we are just now anticipating  
7 that guidance will be published soon that will  
8 equally address biodiversity and natural  
9 resources, and the title and the intent.

10 But the NOP has left biodiversity  
11 out of their accreditation check lists you use  
12 to accreditate certifiers. If biodiversity  
13 and natural resources are not treated equally,  
14 a misunderstanding will arise. Biodiversity  
15 is so much more than natural resources.

16 It's conserving the diversity of  
17 all life and ecological processes, much more  
18 than the short list of natural resources that  
19 humans use that's part of the 205.200  
20 standards, soil, water, wetlands, lowlands,  
21 and wildlife.

22 Biodiversity conservation is in

1 the rule twice, it's in the preamble and it's  
2 defined by the NOSB. Organic production  
3 definition includes conserving biodiversity,  
4 the preamble explains that that use of the  
5 word "conserve" means that a producer must  
6 initiate practices to support biodiversity,  
7 and compliance is required, for perennial  
8 systems biodiversity is also required.

9           While it's important that the USDA  
10 and NRCS is now participating with the NOP,  
11 the NOP reach encompasses the biodiversity  
12 issue broader than NRCS, such as those under  
13 US Fish and Wildlife Service and EPA.

14           Another issue that NOSB was  
15 addressing in the fall 2012 biodiversity  
16 discussion document was high conservation  
17 value areas. These are natural habitats that  
18 have been identified as having outstanding  
19 importance due to their environmental,  
20 biodiversity or landscape values.

21           The NOP three-year waiting period  
22 for land with pesticides incentivizes farmers

1 to convert pesticide-free high conservation  
2 value areas to organic production because they  
3 can do it quickly. And this has to change.  
4 Either this issue needs to be put into  
5 guidance, or the NOP should make an  
6 interpretation on the intent of the rule, put  
7 it out for public comment and do some rule  
8 making.

9 If the NOP Sunset process is not  
10 changed back to what it was, material that was  
11 approved before biodiversity impacts were  
12 considered in the review process, might stay  
13 on the list indefinitely.

14 The NOP should remove open ocean  
15 nets in facilities from the proposed  
16 aquaculture standard, because pollution and  
17 disease, fish escapes, habitat damage  
18 occurring will never allow them to be able to  
19 meet the requirements to conserve by diversity  
20 and maintain or improve water quality and  
21 wildlife.

22 I want to share some materials

1 we're developing with the International  
2 Organic Inspectors Association when training  
3 inspectors, like this slide here. And also we  
4 just published a document on co-managing food  
5 safety and conservation.

6 If the Board has any questions  
7 about the fall 2012 NOSB biodiversity  
8 document, I'd be happy to answer them. Thank  
9 you.

10 CHAIR STONE: Thank you, JoAnn.

11 (General applause.)

12 CHAIR STONE: Jay --

13 MEMBER FELDMAN: Thank you, JoAnn.  
14 Okay. So we heard that NOP is working on the  
15 release of policy, so that's a good thing.  
16 Right?

17 MS. BAUMGARTNER: Yes, that's  
18 great.

19 MEMBER FELDMAN: Okay. If you're  
20 speaking directly to them, I guess you have an  
21 opportunity to do that, what are the critical  
22 issues -- are there any other critical issues

1 that you didn't mention in your presentation  
2 that need to be --

3 MS. BAUMGARTNER: Yes, well, back  
4 in 2009 the NOSB made a comprehensive  
5 recommendation on this issue, and they said  
6 that training needs to occur, not just with  
7 inspectors, but also with farmers.

8 And working with the IOIA, we did  
9 a survey this winter where we talked to over  
10 50 organic inspectors and certification  
11 reviewers about conservation. And while  
12 three-quarters of them said that they were  
13 addressing some aspect, only about a third of  
14 them were addressing it at any deep level.

15 And they told us that a really big  
16 problem was only about 60 percent of the  
17 farmers even know what conservation is. So  
18 that's a big problem. And they also said that  
19 -- or 94 percent of these inspectors and  
20 certification reviewers said that they'd like  
21 more training materials and training.

22 So that's a big issue, and I hope

1       somehow either the NOSB and NOP work together  
2       on this issue of high conservation value areas  
3       and/or we can help work with that, or put a  
4       team together. It's a critical issue. It has  
5       to be addressed. It's not going away.

6                   CHAIR STONE: Thank you, JoAnn.  
7       Thank you very much for being here.

8                   MS. BAUMGARTNER: Thank you.

9                   CHAIR STONE: Being at every --  
10      I'm sorry, Jean. I forgot you.

11                   MEMBER RICHARDSON: Just a quick  
12      comment and actually it tied in with a  
13      question to Miles. I think this is a very  
14      timely presentation and I particularly  
15      appreciated it, having been a professor of  
16      environmental studies and natural resources  
17      for many years.

18                   And I'm wondering, Miles, if this  
19      is an opportunity first to fold this critical  
20      element of what should be in the OCPs and have  
21      us working on in the few years since Barry  
22      Flamm brought this to us, fold it into the

1 NRCS work that we will be doing on the -- what  
2 are those called, our accreditation  
3 subcommittee, because it fits in with the soil  
4 conservation aspects that we'll be looking at,  
5 even though it adds a different nuance. I  
6 think it enriches that kind of work that we  
7 could be involved in.

8 MR. McEVOY: Yes, it's something  
9 we can look into. I think what JoAnn was  
10 saying was about the accreditation component  
11 on the accreditation audit reports, which is,  
12 you know, different than what we were looking  
13 at for the conservation plans. But I don't  
14 see any reason why we couldn't look at this as  
15 well during that review.

16 MS. BAUMGARTNER: If I could just  
17 add to that, the high conservation value areas  
18 is directly related to the ATL that Sarah  
19 Brown talked about, the highly erodible lands.  
20 It's those sensitive areas that shouldn't be  
21 farmed, and ATL is part of that. So the other  
22 high value conservation areas could be wrapped

1 into this whole discussion.

2 CHAIR STONE: Good. Thank you.

3 So, members of the committee, kind of put that  
4 together. Thank you very much.

5 So, Jake, we'll get you in back in  
6 order, and, Lauren, we apologize for the  
7 inconvenience.

8 MR. LEWIN: All right. Hi  
9 everyone. Thank you very much for your  
10 service. My name is Jake Lewin. I'm the  
11 president of CCOF certification services.  
12 We're the largest accredited certifier to the  
13 National Organic Program.

14 We work with a really large  
15 variety of operations, a really huge slough of  
16 them, and that includes 1400 operations that  
17 are classified below the USDA small farm  
18 definition, and a number of larger operations.  
19 We're currently performing about 4,000  
20 inspections a year, and about 400 of those are  
21 in retailers, retailer who seek certification  
22 voluntarily.

1                   So I want to talk to you a little  
2 bit about the CACC subcommittee proposal on  
3 retail certification. We recognize the  
4 complexities of this. In fact, we certified  
5 the first retailer ever as far as we know in  
6 1997. I'm sure another certifier will correct  
7 me if I'm wrong.

8                   And, you know, today we work with  
9 about seven different retailers, which from  
10 our perspective is actually a lot. And we  
11 recognize the value of this, the value of  
12 retail certification and the current -- and we  
13 also recognize the value that the current  
14 exemptions, thumb certification that is  
15 important I think to our marketplace.

16                   But we really think there needs to  
17 be a difference between what an exempt  
18 retailer and a certified retailer can do. And  
19 we really think that 18,000 operations in the  
20 US alone have invested a lot to get certified.

21                   And that -- we're kind of thinking  
22 this proposal, the allowance for a

1 non-certified retailer to utilize the USDA  
2 seal and make certified organic claims of  
3 their own making within their store is really  
4 -- kind of degrades all the effort and all the  
5 certification that's happened before then.

6           And so we think there could be a  
7 better way to go with this, which is to limit  
8 the use of the USDA seal, which in every other  
9 area of the rule isn't allowed, and the term  
10 "certified organic", every other area of the  
11 rule, the basis of certification is that -- is  
12 the right that certification conveys. So we  
13 think that would be a better approach in that  
14 case. And we'd be happy to provide more  
15 information.

16           In terms of GMOs, we think the  
17 seed purity is really, really important. We  
18 think the phase-in with the five- and ten-year  
19 implementation is workable, and we see this as  
20 a really critical baseline for addressing  
21 this.

22           CCOF, within the period residue

1 testing regime, will be doing increasing GMO  
2 testing. And I think sometimes there's a  
3 misunderstanding that GMO contamination is  
4 somehow okay because there's not some kind of  
5 level like there is for the unavoidable  
6 residual environmental contaminants, and in  
7 any case where a residue of GMOs is found, we  
8 would always investigate and it's always taken  
9 seriously within certification.

10 And in the coming year, you know,  
11 we looked -- we're going to do more testing  
12 and then we're going to be looking at a .9  
13 percent as kind of a baseline where we're  
14 going to take things more seriously, and as  
15 kind of what we understand to be the, for lack  
16 of a better word, industry benchmark.

17 So we're going to be looking at  
18 that very closely. We really look forward to  
19 coming back with more information about how  
20 these things go. In the meanwhile, we really  
21 do need to see purity as that core piece at  
22 the very beginning from which, after that,

1 additional measures can be taken to help  
2 ensure that the commodities are not  
3 contaminated.

4 So anyway, really appreciate all  
5 the work you guys do, and we'd welcome any  
6 questions.

7 CHAIR STONE: Thank you, Jake. I  
8 have one, seeing no hands. So if product that  
9 is processed, based certified organic, but if  
10 GMO contamination shows up in the marketplace,  
11 what kind of anecdotal stories do you have, or  
12 one story if you will. I mean what happens to  
13 that product, I mean is it -- does it change  
14 the value or the salability of the product?

15 MR. LEWIN: I mean I didn't value  
16 its salability or, you know, tremendously  
17 affected by who is the buyer and the seller  
18 and what their requirements are. I can -- but  
19 there's a lot of evidence, I think a lot of  
20 people talked to evidence of what affects  
21 salability.

22 I know that at a compliance level

1 an incidence of contamination of really any  
2 kind within periodic residues would result in  
3 a need to figure out why that is there and to  
4 do work to address it.

5 CHAIR STONE: Nick?

6 MEMBER MARAVELL: Yes, Jake, what  
7 protocols are you using for your GMO sampling,  
8 and are you looking at -- how do you choose  
9 which products you are going to sample and at  
10 what point you're going to sample those?

11 MR. LEWIN: Well --

12 MEMBER MARAVELL: Or inputs, the  
13 products or inputs --

14 MR. LEWIN: Well, I'll tell you  
15 what we really like about the periodic residue  
16 rule. It's really well written, which is it  
17 gives broad discretion for how to apply these  
18 things in the best way possible.

19 Right now we are -- we're looking  
20 at all the available testing methodologies  
21 honestly, and we'll probably use different  
22 things in different settings, and we'll likely

1 do some laboratory testing and some strip  
2 testing and we're looking at the existing  
3 protocols that are out there in terms of other  
4 non-GMO programs and looking at what they  
5 believe to be effective and then we'll be just  
6 using that as guideposts for how we will move  
7 forward.

8           The kind of direction that I gave  
9 internally was, well, let's do this where it  
10 actually could be found. Right. We're not  
11 going to test a commodity for which it is  
12 pointless. But we might look at different  
13 points in the supply chain, not just at crops.  
14 I think it's pretty important.

15           CHAIR STONE: Thanks, Jake.

16           MR. LEWIN: Yes, thank you very  
17 much.

18           CHAIR STONE: Lauren Bernick,  
19 thank you for your patience. And Lisa Bunin  
20 is on deck.

21           MS. BERNICK: Hi. I'm speaking  
22 about aquaculture animals, something we've

1 already touched on. My name is Lauren  
2 Bernick. I'm a consumer, a mother, author of  
3 the blog, My Non-Toxic Life, and I'm from  
4 Texas. Welcome to Texas.

5 I'm a member of the Cornucopia  
6 Institute. I'm here today as a citizen  
7 lobbyist because -- I volunteered to present  
8 testimony because I am very concerned about  
9 the integrity of organic foods.

10 Since switching my family to 100  
11 percent organic non-GMO foods two years ago,  
12 we've all seen vast improvements in our  
13 health. So I take it very seriously. I take  
14 it as a personal affront when anyone tries to  
15 undermine that little logo right there. It,  
16 to me, has come to mean the last bastion of  
17 safe food that I can feed my family.

18 No regulations have been  
19 established for aquatic animal or plant  
20 production, so the first order of business  
21 before petitions are approved must be the  
22 establishment of organic regulations. This

1 alone is reason enough to vote against any  
2 materials petitioned for use in aquaculture.

3 The NOP should not request review  
4 of aquaculture materials when they have not  
5 published the aquaculture standards. It's  
6 unsettling that the NOP is placing pressure on  
7 the NOSB to approve aquaculture material prior  
8 to approving an overall standard based on NOSB  
9 recommendations.

10 Organic agriculture is a  
11 production system that responds to  
12 site-specific conditions and promotes  
13 ecological balance. The raising of livestock,  
14 primarily fish, but also aquatic and  
15 vertebrates is fundamentally different from  
16 the raising of terrestrial livestock.

17 From an organic standpoint it's  
18 essential to take those differences into  
19 account when considering both the regulations  
20 and any possible additions to the synthetic  
21 materials to the National List. The fact that  
22 organic regulations have not yet been

1 developed and approved by both the NOSB and  
2 NOP indicates that these differences have not  
3 been fully resolved.

4           Specifically for aquatic animals  
5 the following petition materials must be  
6 rejected: chlorine, tocopherols, trace  
7 minerals, vitamins and vaccines. The main  
8 reason that these materials must be rejected  
9 is because there are no organic aquaculture  
10 standards upon which to judge the use of these  
11 materials.

12           Secondly, much of the information  
13 needed to assess these materials is missing.  
14 Chlorine has not aquaculture technical report,  
15 tocopherols are both a vitamin and a  
16 preservative, and the listing proposal doesn't  
17 specify its use.

18           Trace minerals are so broad that  
19 they don't even specify which minerals they  
20 include. Vitamins are produced using  
21 undisclosed proprietary manufacturing  
22 practices which can include prohibited

1 substances or genetic engineering.

2 Vaccines are so broad we don't  
3 even know which ones they're referring to, and  
4 they too can be produced using excluded  
5 methods, including genetic engineering without  
6 clearly labeling them.

7 There's clearly not enough  
8 information on any of these materials to  
9 understand their potential impacts. Likewise,  
10 there's no designation if they will be used in  
11 open-pen systems or closed ones.

12 The world's fisheries are already  
13 in crisis. Open-pen fish farming increases  
14 disease transmission and genetic pollution  
15 into wild stocks, pollutes the water with  
16 excess feces, nutrients and is largely  
17 dependent on unstable feed sources.

18 It is truly frightening that  
19 organics might embrace factory farm fishing  
20 that contributes to the further peril of our  
21 oceans, waterways and wild aquatic organisms.  
22 Therefore, please reject all aquaculture

1 proposals, or at the very least amend them to  
2 include a five-year Sunset date.

3 Thank you for allowing me to  
4 present testimony. If you have any questions,  
5 please refer them to the Cornucopia Institute.

6 (General applause.)

7 CHAIR STONE: Thank you very much,  
8 and thank you for your support of organic  
9 food.

10 MS. BERNICK: Thank you.

11 CHAIR STONE: Lisa Bunin is up,  
12 and Liana Hoodes is on deck.

13 MS. BUNIN: Good afternoon. My  
14 name is Lisa Bunin and I'm the Organic Policy  
15 Director at the public interest organization  
16 Center for Food Safety.

17 On the 20th anniversary of the  
18 Organic Foods Production Act, Senator Leahy  
19 invited Deputy Secretary of Agriculture,  
20 Kathleen Merrigan, to share her reflections on  
21 OFPA with his agriculture nutrition and  
22 forestry committee.

1 Merrigan recalled how Congress  
2 carefully chartered the NOSB to facilitate  
3 consensus among stakeholders regarding the  
4 interpretations of OFPA. She also underscored  
5 the gatekeeper function Congress entrusted to  
6 the NOSB to stringently evaluate synthetics  
7 before allowing them on the National List.

8 The role of any gatekeeper is to  
9 limit entry to only the most qualified. For  
10 OFPA this means upholding the synthetics  
11 prohibition, permitting only certain temporary  
12 exceptions.

13 Congress assigned the NOSB this  
14 critical gatekeeper function after hearing  
15 from constituents that the organic community  
16 with stakes in the continuing organic  
17 integrity insisted that it maintain control  
18 over vetting synthetics. That way no sector  
19 of organic could unduly influence the process  
20 or curry favor with the Secretary of  
21 Agriculture no matter who held that office.

22 No one would argue that this a

1 perfect process, but the NOSB's gatekeeper  
2 actions have made it difficult for synthetics  
3 that do not meet OFPA's health, environment  
4 and essentiality criteria to make it on the  
5 National List.

6           Unfortunately, this important role  
7 has been wrongly served by USDA NOP by  
8 weakening OFPA's Sunset provision in two  
9 significant ways. First, the new policy  
10 reverses the presumption that a substance will  
11 be removed from the National List to a  
12 presumption that it will be retained.

13           The policy includes a change into  
14 the Sunset voting procedure from two-thirds  
15 majority vote needed to put a substance back  
16 on the National List, to a two-thirds majority  
17 vote need to remove a synthetic from the list.

18           Secondly, the policy allows  
19 synthetics to be renewed by subcommittees  
20 without a full Board vote. This undermines  
21 Congress's intent of giving the legal  
22 authority to gatekeep synthetics to a diverse

1 15-member stakeholder Board.

2           The new Sunset policy also  
3 undermines the principal of continuous  
4 improvement, one of the cornerstones of OFPA's  
5 implementation. Instead of strengthening  
6 procedures that pressure petitioners to find  
7 alternatives within five years of the time of  
8 listing, it creates complacency by creating  
9 the expectation that synthetics will be  
10 automatically renewed.

11           Critically the organic brand in  
12 consumer markets is driven by organic's high  
13 integrity, not the ability to accommodate the  
14 lowest common denominator. It's incumbent  
15 upon USDA NOP to not forge ahead with  
16 streamlining the Sunset process at the expense  
17 of public trust or confidence in the organic  
18 label.

19           Market growth fueled by a policy  
20 that increases the number of synthetics in  
21 organic is destined for failure as stated in  
22 recent letters sent to USDA by both OFPA's

1 original drafters and former NOSB chairs.  
2 They're calling for USDA to rescind its  
3 September 2103 Sunset policy and to engage the  
4 public on the issue. The Center for Food  
5 Safety adds our voice in support of that  
6 effort.

7           Moving to aquaculture, CFS has  
8 always been -- the position has always been  
9 that no petition to add a substance to the  
10 National List for use in organic agriculture  
11 should be considered until final regulations  
12 are promulgated.

13           In the absence of knowledge about  
14 the system within which a substance would be  
15 added, approving any substance would be  
16 arbitrary, capricious and unlawful. We urge  
17 the NOSB to deny all petitions for material in  
18 organic aquaculture systems.

19           Neither the NOSB nor the NOP has  
20 officially evaluated the wide range of  
21 aquaculture systems that could be considered  
22 organic. The only system presented to the

1 organic community, open ocean net facilities,  
2 has been championed by the aquaculture working  
3 group, comprised of members with vested  
4 interests in this system.

5 The Center for Food Safety has  
6 consistently argued that open ocean  
7 aquaculture can never be organic, and as such,  
8 we urge the NOP to prohibit them in organic.  
9 Thank you.

10 (General applause.)

11 CHAIR STONE: Very good. Thank  
12 you, Lisa.

13 Jay?

14 MEMBER FELDMAN: Thank you, Dr.  
15 Bunin. I wanted to switch subjects a little  
16 bit. You had written extensively to the Board  
17 on methionine, and I'm particularly interested  
18 in two things.

19 One, you know, this sort of  
20 chicken and the egg argument that we require  
21 this material, amino acid, because of the  
22 scale in which we're operating, and the lack

1 of access to pasture. And we can't really  
2 mess with reducing or eliminating the chemical  
3 because of the systems which are in place.

4 We can't change the systems in  
5 place if we allow continued access to the  
6 chemical and don't effect some sort of  
7 transition, which this Board is on record as  
8 endorsing, in a very forceful way by the way.  
9 Right. As you know.

10 You come along and say, Well,  
11 look, Board, there are these other sort of  
12 quirky alternatives out there, but they're not  
13 going to get traction unless you do something.  
14 And Terry referred to this as too big to fail,  
15 which I like that concept.

16 So what do you want to say to  
17 Board members who are on the fence about this,  
18 and seem to be prepared to let this treadmill  
19 go on and on and on with no end in sight?

20 MS. BUNIN: Well, my colleague is  
21 going to talk about this tomorrow, but I will  
22 give you a little preview in that. We just

1 produced a report on animal welfare in the  
2 poultry industry, and we are very critical of  
3 the reluctance to move forward on animal  
4 welfare regulations.

5 And the commissioned USDA report  
6 says that five big organic producers are  
7 unable to implement the very minimum and basic  
8 animal welfare recommendations that were put  
9 forward by the NOSB. And so as a result it  
10 appears as though there are some big large  
11 producers that are holding hostage the  
12 majority of small and medium sized producers  
13 that are able to meet the standards.

14 And issues like methionine, the  
15 synthetic methionine, really prop up this  
16 really large system of organic poultry  
17 production, and so we feel that beginning to  
18 require more space requirements is really  
19 essential, as well as looking at some of these  
20 alternatives seriously.

21 There's still quite a bit of time  
22 until methionine is set to run out to look at

1 this applies or a way or a number of herbs and  
2 minerals. We really feel like that's the  
3 system that we should be headed in, and if  
4 those large producers can't really make the  
5 mark, then perhaps they should consider  
6 leaving the system.

7 CHAIR STONE: Thank you, Lisa.  
8 Miles has a comment.

9 MR. McEVOY: Yes, the economic  
10 study that we did last year was part of the  
11 process of putting the work together so we can  
12 move forward with rule making on animal  
13 welfare. So it's -- there is an economic  
14 impact for us to move forward with those  
15 animal welfare recommendations.

16 In order for us to do that and be  
17 successful, we need to have that economic  
18 information. So that's one --

19 MS. BUNIN: But --

20 MR. McEVOY: -- piece in the --  
21 let me finish -- that's one piece in the  
22 process of us being able to move forward.

1 There's a lot more information we need.

2 There is nothing that we said that  
3 we're not going to do this. What we said was  
4 that it was not going to happen in the near  
5 future because we had many other things to do.  
6 So say that something's being held hostage  
7 because of that report, that report was to try  
8 to move this process forward.

9 And that it will move forward. We  
10 need more information and more economic  
11 analysis so that we can be successful in  
12 implementing that recommendation. So I just  
13 -- it just -- that's enough. Thanks.

14 CHAIR STONE: Thanks, Miles.

15 Thank you, Lisa.

16 Oh, I'm sorry, Francis.

17 MEMBER THICKE: Lisa, in your  
18 research did you -- do you come to the  
19 conclusion that aside from those five large  
20 houses, the others could make it without any  
21 synthetic methionine?

22 MS. BUNIN: Yes, and that's the

1 conclusion of the USDA's own study. And just  
2 to clarify, it was not me who said that you  
3 were going to delay the animal welfare  
4 regulation development, it was you who  
5 released the report with that statement, so  
6 that's why we went and took a look at what was  
7 the economic basis.

8 And you'll hear more about it  
9 tomorrow, but, in fact, the model is a fairly  
10 -- it was a fairly stagnant model and it  
11 really didn't look at market flexibility  
12 because, in fact, as some of the big producers  
13 might end up exiting the market, some of the  
14 small and medium producers might actually  
15 economically thrive under those conditions.

16 CHAIR STONE: Thanks, Lisa.

17 MR. McEVOY: Right. It's one  
18 piece of the process, so it's one report, we  
19 need lots more information, so we really  
20 appreciate the report that you all put  
21 together that will help us to move forward on  
22 this issue.

1 MS. BUNIN: Great. We're on the  
2 same page. Thank you.

3 MR. McEVOY: We are.

4 CHAIR STONE: Thank you.

5 Liana is up, and Robert Adams on  
6 deck.

7 MS. HOODES: Good afternoon. I'm  
8 Liana Hoodes. I'm the Executive Director of  
9 the National Organic Coalition. We're a  
10 national alliance of organizations working to  
11 provide a Washington voice for farmers,  
12 ranchers, environmentalists, consumers and  
13 industry members involved in organic  
14 agriculture.

15 To the Board I say thank you.  
16 Please stay strong and committed and we  
17 appreciate this job you're doing.

18 The National Organic Coalition is  
19 extremely disturbed at recent actions by USDA  
20 that severely limit the procedures and  
21 functioning of the NOSB, as well as  
22 contravening the Organic Foods Production Act.

1                   Not the least that the new Sunset  
2 policy violates OFPA because it does not  
3 subject all materials to the required review,  
4 careful analysis, public debate and decisive  
5 two-thirds vote as a prerequisite for allowing  
6 a material to be relisted through the Sunset  
7 process. We demand that USDA reinstate the  
8 original Sunset policy.

9                   Equally distressing is the  
10 Department's heavy hand at controlling both  
11 the Board's agenda and the direct relationship  
12 to the Secretary. As long as this policy  
13 continues unresolved at USDA, we ask members  
14 of the NOSB to compel full review, analysis,  
15 public debate and vote by the entire Board for  
16 all materials at Sunset.

17                   Our concern with this heavy  
18 handedness at USDA rests with the Secretary.  
19 While the USDA maintains control of the USDA  
20 organic label, it does not control the true  
21 meaning of organic food and agriculture.  
22 Organic is a comprehensive alternative to our

1 conventional food and agriculture system that  
2 USDA has never embraced, despite the good work  
3 of a few dedicated individuals.

4 The USDA continues to maintain  
5 it's simply a marketing label and subject to  
6 market forces. Organic is more than a market  
7 label. It's an alternative that's desperately  
8 needed now for human, environmental and global  
9 health, and you on the NOSB are the torch  
10 bearers for this entire system as you  
11 implement the label.

12 As you know, the degradation of  
13 high standards of the label can have  
14 significant deleterious effects to the real  
15 values of organic. So when USDA takes your  
16 power away, we are left with a federal  
17 government that seeks to marginalize the  
18 success of organic.

19 The needs of family farmers, farm  
20 workers, human health and environmental  
21 sustainability take a back seat at USDA for  
22 the profit of the conventional non-organic

1 system. This plays out unnecessarily in your  
2 work load and your agenda.

3 Why are you being asked to approve  
4 materials for an aquaculture system that is  
5 yet to be defined? Why has your review of  
6 inerts not proceeded despite a plan that would  
7 streamline review and finally address what the  
8 organic naysayers describe as toxics allowed  
9 in organic?

10 Why, after a dozen years, do we  
11 still agonize over the definition of something  
12 so basic as synthetics, non-synthetics and the  
13 classification of materials? Why is the role  
14 of the consumer's expectations being dismissed  
15 somehow as a special interest not to be paid  
16 attention to?

17 Why has the Department never  
18 fulfilled its requirement for a continuous  
19 oversight mechanism of the NOP? This is not  
20 an accident. It is business as usual for the  
21 federal government that does not believe in  
22 the success of the organic alternative that

1 was supposed to be more -- not more than a  
2 label.

3 Except that the farmers who  
4 insisted on being regulated to ensure that the  
5 definition of organic stays consistent and  
6 strong and is fairly implemented throughout  
7 the country. That the producers, the farmers  
8 of organic would have a level playing field  
9 against market forces.

10 Seed purity. Your voice on seed  
11 purity and GMO contamination is really  
12 important. Yet the discussion can't happen in  
13 a vacuum and seed purity can't happen in the  
14 absence of strong national policy of GMO  
15 contamination prevention.

16 Please continue to directly appeal  
17 to Secretary Vilsack that we need a fair  
18 contamination prevention plan, including a  
19 compensation scheme that holds the owners of  
20 the technology responsible before we ask  
21 organic farmers to take more unilateral  
22 responsibility.

1                   Whoo. Whoo.

2                   CHAIR STONE: Very good.

3                   (General laughter and applause.)

4                   MS. HOODES: I'm in the running.

5                   CHAIR STONE: Good. Now, Mark --

6 Mark, you out of the running, bud. Sorry.

7                   Okay. Thank you. That was very

8 -- you got a lot of information in there too

9 as well.

10                  Colehour?

11                  MEMBER BONDERA: I have what I

12 hope is a quick question. Liana, I thank you

13 for your testimony. Very timely. Can you,

14 just for the -- for -- to wrap my brain around

15 it a little bit, you commented and I wrote it

16 down, continuous oversight of NOP, can you

17 expand on that briefly, please?

18                  MS. HOODES: Yes, under the law

19 and the regulation, the NOP is required to

20 have -- to participate in its own

21 accreditation review system. The peer review

22 panel is part of that, but I think it's a much

1 more -- and I look forward to seeing the  
2 results of this, but this has got to happen  
3 and it's got to happen soon, that there's  
4 oversight in a quality system mechanism. Lynn  
5 Cody will be detailing this a little bit more  
6 in her comments for us.

7 MR. McEVOY: Yes, and just to give  
8 a little bit more on the peer review. The  
9 peer review is a requirement as, Liana, as  
10 you're saying. We have been conducting peer  
11 review of the program through various  
12 mechanisms over the last few years and had a  
13 list review a few years ago.

14 We have peer reviews that are  
15 conducted by our peers, which are foreign  
16 governments, when they come in to do the  
17 international agreements. Those peer review  
18 reports are on our website.

19 This is, I agree, a very important  
20 issue to fully implement. We have some  
21 concepts that we hope to work with the Board  
22 on in terms of a way of having the Board

1 involved in the peer review process of the  
2 program. So I'll be meeting with Lynn to  
3 discuss that further during this week.

4 MS. HOODES: Very good. Thank  
5 you.

6 CHAIR STONE: Thanks, Liana.

7 Right now you've got the choice  
8 between the mug or the t-shirt.

9 (General laughter.)

10 CHAIR STONE: Robert Adams is up,  
11 and Linley Dixon is on deck.

12 Robert?

13 MR. ADAMS: Hi, my name is Robert  
14 Adams. I am a member of Cornucopia Institute,  
15 and I'm here today as a citizen lobbyist. I  
16 own a landscaping business in Austin, and I am  
17 an organic gardener as well.

18 I drove here today because  
19 maintaining and strengthening organic  
20 standards is extremely important to me. I  
21 would like to comment on the preliminary  
22 review of the Sunset materials gellan gum,

1       tragacanth gum, Marsala and Sherry wine.

2                   Cornucopia requests that new  
3       technical reviews be completed on all of these  
4       materials before they are considered for  
5       relisting. No technical report was ever  
6       prepared for non-organic Marsala or Sherry,  
7       though the heavy use of pesticides in the  
8       production of conventionally grown wine grapes  
9       is well known, as well as the use of synthetic  
10      preservatives and other additives.

11                   Cornucopia contacted the original  
12      petitioners of Marsala and Sherry, and they  
13      are no longer using these cooking wines in  
14      their products. Organic sources of  
15      Marsala-like wines and Sherry-like wines exist  
16      to meet any change in demand in organic  
17      production.

18                   Therefore, Marsala and Sherry are  
19      not essential because organic alternatives are  
20      available. If Marsala and Sherry are relisted  
21      for some reason, we recommend an annotation to  
22      prohibit fortified wines that contain added

1 sulfites.

2 No technical report was ever  
3 prepared for tragacanth gum. A nearly  
4 identical organically available emulsifier,  
5 thickener and stabilizer is organic gum  
6 arabic. Therefore, tragacanth gum is not  
7 essential as a non-organically produced  
8 ingredient allowed in organics.

9 The technical report for gellan  
10 gum is outdated and does not distinguish  
11 between the processes used in precipitating  
12 high acyl gellan gum and deacetylated gellan  
13 gum. We might have recommended reviewing only  
14 the high acyl native form of gellan gum for  
15 approval, but this is extracted with isopropyl  
16 alcohol leaving 750 ppm in the product.  
17 Solvent extraction is an excluded method in  
18 organics.

19 We carefully reviewed the comments  
20 of food processors, handlers and trade  
21 associations requesting to relist gellan gum.  
22 While we recognize that it keeps fortified

1 calcium in suspension, manufacturers could  
2 choose to use soluble forms of calcium  
3 instead.

4 We urge manufacturers to recognize  
5 that many consumers of organic products read  
6 labels -- I am one who definitely does -- and  
7 buy the products with the fewest additives.  
8 Rather than pushing for these ingredients to  
9 be included in organics, why not advertise  
10 your products are free of additives?

11 Consumers are already accustomed  
12 to shaking many products and cartons before  
13 using. We prefer that to adding of  
14 ingredients that may not meet organic  
15 standards. If any of these materials are  
16 relisted, we urge that a five-year expiration  
17 date be added as a notation to the listing  
18 given the new Sunset policy.

19 Thank you for allowing me to  
20 present my testimony. If you have questions  
21 about this testimony, I encourage you to speak  
22 with one of Cornucopia's staff members. Thank

1     you.

2                   CHAIR STONE:  Thank you, Robert.

3                   Linley Dixon is up, and Dawn --  
4     excuse me, I'm from Kentucky -- Unruh.  If  
5     you'll correct me when you get up.  Thank you.

6                   Linley?

7                   DR. DIXON:  Hi, my name is Linley  
8     Dixon.  I'm here to comment on the exciting  
9     topic of boiler additives, and we're passing  
10    around a survey that we did.  I'm a food and  
11    farm policy analyst for the Cornucopia  
12    Institute.

13                   I have a Ph.D. in plant pathology  
14    from the University of Florida, and a master's  
15    degree in plant and soil sciences, part of  
16    West Virginia University's organic farm  
17    project.

18                   I have worked as a researcher for  
19    the USDA Agricultural Research Service in  
20    Beltsville, and I currently own a 100-member  
21    CSA and farmers market vegetable farm in  
22    Durango, Colorado.

1 I'd like to comment on the  
2 petitions to add ammonium hydroxide and PGME  
3 to the National List as boiler additives. The  
4 Cornucopia Institute conducted a survey  
5 requesting feedback from the organic community  
6 on the essentiality of boiler additives.  
7 Thirty-six out of 39 respondents from a wide  
8 diversity of handlers, including cheese,  
9 edible oils, beer, tofu, milk, juice, almonds,  
10 dehydrated potato products, prepared meats and  
11 purees required that they do use boiler  
12 additives.

13 The two that didn't use them  
14 responded that they could only do so because  
15 they don't have hard water, and then  
16 mechanically clean out the system, usually  
17 annually.

18 The boiler additives used included  
19 oxygen scavengers, phosphates, amines, and  
20 alkaline substances. One of our survey  
21 questions was, If the NOSB voted to remove  
22 synthetic boiler treatments from the list of

1 approved materials, what would your actions  
2 be? Here are several responses.

3 This would have adverse affects on  
4 the performance and longevity of a boiler.  
5 There would be increase for a corrosion and  
6 energy cost due to scale deposits. We have to  
7 find an approved chemical.

8 Running our boiler without the  
9 treatments we're using now would void our  
10 warranties. We are unaware of any  
11 non-synthetic substitutes. The only option I  
12 found is a \$40,000 clean steam generator.

13 We would cease organic production  
14 if no suitable treatment was feasible for  
15 boiler health. While the process could still  
16 be done, the machinery would break down  
17 cyclically. It's not economically practical.  
18 It could jeopardize the continued manufacture  
19 of organic products.

20 And finally, We currently shut  
21 down the chemical injector 48 hours prior to  
22 making organic pellets, and make non-organic

1 pellets for those two days. At the end of the  
2 organic round, we turn the chemical injector  
3 back on. This works for us, but we would have  
4 to use a boiler chemical most of the time. If  
5 not, the boiler would become a bomb.

6 It's well understood that ammonium  
7 hydroxide persists in steam and has contact  
8 with the organic product. Ammonium hydroxide  
9 is a thus, synthetic chemical that appears to  
10 be non-toxic at concentrations less than 1,000  
11 parts per million. Concentrations of ammonium  
12 is seen in the range of 5 to 25 parts per  
13 million, and then much lower once added to the  
14 food.

15 The Cornucopia Institute  
16 recognizes that ammonium hydroxide is the most  
17 cost-effective method to prevent corrosion in  
18 boilers. It's also a safer alternative to the  
19 toxic amine boiler additives currently on the  
20 National List, for use only in packaging  
21 sterilization because of their known  
22 volatility and toxicity.

1                   So our stance is that these amine  
2 boiler additives should be removed from the  
3 list and that if ammonium hydroxide is  
4 approved, it should be considered for Sunset  
5 after five years, and only if adequate  
6 research concludes that the organic industry  
7 is prepared to operate without them.

8                   Finally, the Cornucopia Institute  
9 opposes the use of PGME in organic food,  
10 without adding it to the National List, PGME  
11 should be considered by the full Board based  
12 on the evidence that it does come into contact  
13 with the organic food through entrainment of  
14 water droplets. A direct quote from the TR  
15 states,

16                   "While mechanical entrainment can be  
17 minimized through mechanical or operational  
18 changes, entrainment can occur in all steam  
19 generators. Despite this, the handling  
20 subcommittee recommended to allow its use  
21 without adding it to the list on the basis  
22 that it doesn't come into contact with organic

1 food."

2 So due to the element of  
3 occurrence of entrainment in all steam  
4 generators, PGME would come into contact with  
5 organic food, and the substance is eligible  
6 for petition.

7 So thank you for allowing me to  
8 present testimony, and I'm happy to take any  
9 questions.

10 CHAIR STONE: Thank you, Linley.  
11 Jean?

12 MEMBER RICHARDSON: Hi, Dr. Dixon.  
13 We did talk on the phone, so it's --

14 DR. DIXON: Right.

15 MEMBER RICHARDSON: -- nice to see  
16 you in person, and we'll talk to you later.  
17 I was interested in the data and information  
18 that you've just presented to us. Did you  
19 find any data that would suggest that if  
20 ammonium hydroxide was approved, that it  
21 could, in fact, technically, replace the three  
22 amines that are presently on the list of

1 boiler additives that are only presently able  
2 to be used for packaging sterilization?

3 DR. DIXON: Yes, it's my  
4 understanding -- I'm not, you know, a boiler  
5 mechanic, but it's my understand that ammonium  
6 hydroxide is sufficient, and could replace the  
7 amines that are currently on the list.

8 Based on the -- we asked what  
9 chemicals are you using in the survey, and  
10 several of them were -- did not list the  
11 amines. So several boilers are operating  
12 without those.

13 MEMBER RICHARDSON: But could  
14 ammonium hydroxide be -- I mean do you have  
15 like a scientific article that you might have  
16 found that shows that, in fact, there is an  
17 equivalency in terms of replacing those amines  
18 with ammonium hydroxide?

19 DR. DIXON: Well, just other than  
20 the fact that boilers are operating without  
21 them.

22 MEMBER RICHARDSON: Okay.

1 CHAIR STONE: So I'm just curious  
2 how it becomes a bomb. I've heard that  
3 before, so how does that work?

4 DR. DIXON: My understanding is  
5 that the pressure builds up so high -- I'm not  
6 sure if that's, you know, exactly accurate,  
7 but that the pressure would build up so high  
8 that it could -- that explosions could occur.

9 MEMBER THICKE: I could add that.  
10 Because if you get a build up of scale, the  
11 heat doesn't transfer and then so it gets  
12 hotter than it should be.

13 CHAIR STONE: Thanks. I was just  
14 -- I was curious about that.

15 MEMBER THICKE: Actually, I was  
16 one of the surveyors who doesn't use a steam  
17 additive to our boiler.

18 CHAIR STONE: Thank you. Thank  
19 you, Linley.

20 DR. DIXON: Thank you.

21 CHAIR STONE: Very -- oh, I'm  
22 sorry. Harold? I'm sorry, Linley.

1 DR. DIXON: Oh, hi.

2 MEMBER AUSTIN: Thank you. I  
3 think your tests shown a little bit, as we  
4 move forward into the Sunset review process,  
5 as we look ahead towards the 2016, we do have  
6 the three boiler materials that are on there,  
7 plus the two that we're going to be discussing  
8 today.

9 In your opinion, with the  
10 research, the information that you guys have  
11 gotten back and gathered and presented to us,  
12 and thank you very much for that, it's quite  
13 useful, what -- how would you feel that we  
14 should proceed moving ahead? You know, our  
15 handling discussion will be on Thursday and  
16 ammonium hydroxide and PGME are listed there.

17 It's part of a very broader scope  
18 rather than just a single material. And I  
19 think we want to do -- I think this is a good  
20 example of part of the responsibility of this  
21 Board and the Sunset process is to look at the  
22 materials.

1           You've suggested that there might  
2 possibly be one material that we could take a  
3 serious look at that could possibly replace  
4 three materials that will be up for Sunset  
5 review. I guess a little bit of clarification  
6 on that, and the information you got from some  
7 of these people on that, and how do you feel  
8 we should proceed with this?

9           Because the subcommittee proposal,  
10 moving ahead, was actually going to be -- and  
11 we'll discuss this on Thursday, but was  
12 actually going to be to possibly not list  
13 that.

14           DR. DIXON: Right. I think what I  
15 found was kind of glaring is that the organic  
16 community -- and we even got responses that we  
17 would move ahead without them or leave the  
18 organic industry, so I think if -- we need to,  
19 in our decision making process, use, you know,  
20 the vast list of people that are part of the  
21 program, get their information and before we  
22 act just make sure they're prepared to.

1                   And so our recommendation is based  
2                   on the fact that there -- they don't know how  
3                   to operate right now without them. So if that  
4                   is going to be the NOSB's stance, make sure  
5                   the information is readily available so that  
6                   they can operate without them.

7                   MEMBER AUSTIN: Thank you. A  
8                   great example of why we're all here. Thanks.

9                   CHAIR STONE: Yes, thank you very  
10                  much.

11                  Dawn Unruh, and please correct me  
12                  again, and Cynthia Kurkowski is on deck.

13                  MS. UNRUH: Hi there. I'm Dawn  
14                  Unruh, German. Great to be here. I'm a  
15                  member of the Cornucopia Institute and I'm  
16                  here today as a citizen lobbyist. I'm a mom,  
17                  a wife, a Gigi, for those of you who don't  
18                  know, that's grandma.

19                  And I've been in nutrition and  
20                  fitness all of my life, and I'm just kind of  
21                  wondering, after having the wonderful  
22                  experience of listening to all of this today,

1 what's for dinner. Yeah.

2 I would like to comment on the  
3 motion to remove glycerin from the National  
4 List as an allowed non-agricultural synthetic,  
5 205.605(b). Cornucopia supports the petition  
6 to remove glycerin from the National List.  
7 The TR produced in 2013 states that,

8 "In recent years, new developments have  
9 improved both methods and non-GMO yeast  
10 strains allowing substantial overproduction of  
11 organic glycerin by fermentation."

12 The TR lists 21 handling  
13 operations that manufacture and/or source USDA  
14 certified organic glycerin. Removing glycerin  
15 from the National List is imperative to  
16 incentivize the purchase and continued  
17 increase in production of organic glycerin.

18 Despite this substantial  
19 overproduction of organic glycerin by  
20 fermentation, the OTA and others surprisingly  
21 commented to leave glycerin on the National  
22 List, with an annotation to be used only when

1 organic glycerin is commercially unavailable.

2 This only serves to create a  
3 loophole for the continued use of non-organic  
4 glycerin. The OTA suggests not only leaving  
5 glycerin on 205.605, but also to add the  
6 agricultural version of glycerin to 205.606,  
7 both with commercial availability  
8 requirements.

9 We recognize that commercial  
10 availability is crucial to not disrupting the  
11 organic marketplace. However, the TR  
12 indicates that there's an overproduction of  
13 organic glycerin and multiple manufacturers  
14 that could continue to increase the supply in  
15 accordance with demand.

16 Organic regulations must encourage  
17 transitions to organic options in the  
18 industry. Organic glycerin may be produced by  
19 either microbial fermentation, classified as  
20 agricultural non-synthetic, or by hydrolysis  
21 of organic fats and oils, classified as  
22 non-agricultural synthetic.

1                   Organic glycerin produced by  
2 hydrolysis of organic fats and oils using  
3 either steam splitting or traditional  
4 saponification requires an alkali such as  
5 sodium carbonate, sodium hydroxide, or  
6 potassium hydroxide.

7                   Cornucopia recommends that organic  
8 glycerin should be produced by the process of  
9 microbial fermentation using only mechanical  
10 and biological processes, as required in  
11 205.270(a), the organic handling requirements,  
12 and without the use of allowed synthetics  
13 listed in 205.605(b).

14                  Finally, glycerin is also listed  
15 on 205.603 as a synthetic substance allowed  
16 for use in organic livestock production as a  
17 livestock teat dip. Please consider removing  
18 glycerin from 205.603 since there is already  
19 a surplus of organic glycerin available.

20                  Thank you so much, and questions  
21 will be taken by the staff members from  
22 Cornucopia Institute.

1 CHAIR STONE: Thank you, Dawn.

2 MS. UNRUH: You're welcome.

3 CHAIR STONE: Cynthia Kurkowski is  
4 up, and Barbara Ovalle is on deck.

5 Cynthia?

6 MS. KURKOWSKI: Hi. I had a  
7 script, and I have just thrown it aside, so  
8 I'm kind of just talking to you basically  
9 right now. I represent March Against Monsanto  
10 San Antonio, also the Right to Know movement,  
11 and I'm a concerned citizen.

12 I am here before you -- I find  
13 myself here because of the journey I came  
14 through the GMO marketplace, and the no GMO  
15 marketplace of course. And you need to  
16 understand that the organic community is our  
17 saviors. We see the clouds parting, the  
18 sunlight coming down on you. You are it. You  
19 are our salvation.

20 Every day I talk to people about  
21 how to move away from GMO and how to live GMO  
22 free. You are the only alternative we have

1 now. It is so important. I implore you,  
2 please do not compromise -- do not compromise  
3 on integrity, do not streamline to sacrifice  
4 quality product. Keep it pure, please.

5 I live in Texas, I was born and  
6 raised here. I don't eat food out of the bay  
7 anymore because everybody knows the oil  
8 spills. Our food sources are shrinking. Now  
9 we've got Pacific, so much for my tuna.

10 And it's just -- I am actually  
11 getting to the point now where I'm starting to  
12 tell people, Grow your own. Grow your own.  
13 Because what is the alternative? If you're  
14 going to taint the food, if you're going to  
15 make allowances, introduce synthetic  
16 additives, provide loopholes, don't do it.  
17 Please.

18 We already have all that out there already.  
19 We don't need that.

20 What we need is real food to --  
21 not just for nourishing, but for healing. I  
22 found myself here because family members died

1 from cancer, from kidney failure, from bladder  
2 failure, from gastrointestinal issues. And we  
3 thought we were eating good.

4 I'm not a big fast food eater. I  
5 give fresh vegetables and fruits to my  
6 children. I was juicing. And then I find out  
7 about all the GMOs. I'm thinking I'm doing  
8 pretty good overall, peel everything, you  
9 know. But my only alternative is organic, and  
10 I can't always afford it, but I'm doing it.

11 And I live on the bedroom  
12 community outside of San Antonio, and I'll  
13 tell you about money, because I know money  
14 talks, and that's who you're listening to  
15 right now is big money. Remember your  
16 consumers are your customers, that's who you  
17 really are loyal to.

18 And we need this, and we are  
19 behind you. We will give you all our money,  
20 just please keep it pure. In San Antonio and  
21 Cibolo, Schwertz over there by the Retama, you  
22 know, Racetrack, they -- that HEB out there

1 had nothing organic.

2 It was so difficult to find  
3 organic out there. Within a year I've got  
4 four different displays now, areas, specific  
5 areas for organic now that were not there  
6 before. I now have an organic farmer market  
7 that's coming into my neighborhood. Before I  
8 had to drive 25 miles if I wanted that.

9 So the money's coming in. It's a  
10 growing market. You all know that. Just  
11 please, please be loyal to your consumer, your  
12 customer, because we depend on you for our  
13 health, for life. That's it. Thank you.

14 CHAIR STONE: Good. Thank you.

15 (General applause.)

16 CHAIR STONE: Thank you very much  
17 for a passionate positive for organic.

18 Barbara, if you'd pronounce your  
19 last name, since I'm sure I didn't get it  
20 right, and Juan --

21 MS. OVALLE: It's Ovalle. Barbara  
22 Ovalle.

1 CHAIR STONE: -- and Juan Beltran  
2 is on deck.

3 MS. OVALLE: Okay. My name is  
4 Barbara Ovalle. I am also a local resident  
5 and devoted organic consumer, and I also am a  
6 member of March Against Monsanto San Antonio.  
7 I'm filling in a vacancy, so I'm going to do  
8 the same, I'm just going to speak from my  
9 heart and how I really feel as a consumer.

10 I am here to represent the public  
11 interest and trust in the organic label.

12 First, I want to talk a little bit about the  
13 current perception of that, of the organic  
14 label, at least locally and from family and  
15 friends, people in my area.

16 When I talk about that, when I  
17 talk organics, I get mixed responses. You get  
18 people who are 100 percent, yeah, organic, I  
19 support organic. Then you have others who are  
20 on the opposite ends that really don't care  
21 about their food, they're just like whatever.

22 But now it's starting to be a

1 larger gray area. Conversations are more  
2 sounding like, Well, there's still synthetics  
3 in organics, or How do you know the government  
4 is upholding their job and the organic label  
5 and making sure the standards are there, and  
6 you hear about GMO contamination.

7 So it's -- and I'm hearing it more  
8 now more than before, so it's starting to be  
9 people are falling in the middle. Maybe  
10 they're going away from organics, or maybe  
11 they are learning about organics but then  
12 they're hearing about these things and it's --  
13 so it's -- so basically I just want to say  
14 that the public trust is already an issue  
15 that's treading on shaky ground. So we don't  
16 want to compromise that.

17 Again, as a citizen and consumer,  
18 I believe that transparency and clarity is a  
19 must for the benefit of the people. We need  
20 to truly and wholeheartedly believe and  
21 understand and in layman's terms, that there  
22 is no room for loss of integrity in the

1 organic label.

2 I don't want to think that the  
3 lack of action or lack of data means that  
4 synthetics will just keep lingering in my  
5 food. Sunset seems to have been originally  
6 implemented so that synthetics get  
7 automatically challenged and possibly kicked  
8 out of our food, unless it's been deemed  
9 necessary.

10 So, and that's how it should be.  
11 So the national approved list of materials  
12 should be aiming at getting shorter, not  
13 longer. Over time I think that this will  
14 eventually happen, it's just going to get  
15 longer.

16 So why, as a consumer, should I  
17 keep buying organic? For the chance that it  
18 is truly organic or real food? There should  
19 not be a chance. I want to know. Organic is  
20 my family's safe haven. As Cynthia said, it's  
21 our safe haven in terms of eating non-GMO,  
22 non-synthetic, non-toxic foods.

1           Already I have a serious issue and  
2           concern over the acceptable process of  
3           mutagenesis in organics. That is not an  
4           organic process when genes are manipulated in  
5           that way, irradiated.

6           Also, the farm fish issue now  
7           being brought up, how can that be considered  
8           organic, they are not living in their natural  
9           habitat, so of course they need to be chocked  
10          full of synthetic vitamins, minerals,  
11          vaccines. So to me that's not organic.

12          But I do -- I want to believe that  
13          my family's food will stay real with the least  
14          amount of synthetics as possible, and I'm  
15          afraid that these policy changes will  
16          jeopardize that. Thank you.

17                   CHAIR STONE: Thank you very much.  
18                   Thank you for coming to testify.

19                   (General applause.)

20                   CHAIR STONE: Juan Beltran, and  
21                   Kurt Jacobsen on deck.

22                   MR. BELTRAN: Hello. My name is

1 Juan Beltran. I am a production manager in  
2 BerryMex in Mexico. We grow organic berries  
3 in Jalisco, in Michoacán, in Baja, and I'm in  
4 Michoacán. And I'm here to talk to you about  
5 sulfurous acid from the sulfur burners.

6 We started using them in  
7 Michoacán last year and we've seen good  
8 improvements in our production. And it's  
9 basically what we have seen is that it's a  
10 sustainable way of improving our water. We  
11 have a 8.1 pH water normally in our wells, so  
12 it's really hard for us to grow crops without  
13 being detrimental toward our soil, you know.  
14 So we like to conserve our soil and improve  
15 our production with sulfurous acid.

16 And some other improvements that  
17 we've seen this year in the production, we  
18 have little need for adding micro-nutrients to  
19 our crops and to our soils. The berries have  
20 been able to naturally use what we've used as  
21 amendments from the compost and everything we  
22 use into the soil. Since we have better water

1 quality, these nutrients are en bloc in our  
2 soil and we are being able to grow healthier  
3 berries.

4 In terms of how sulfuric acid can  
5 be a sulphate fertilizer, I don't see it has  
6 -- how it can be viable. The reality is that  
7 we've seen real little improvements in how  
8 sulfates are available either in our leaf  
9 analysis and our soil analysis, and we have  
10 other sources for it, so we can use sulfate  
11 potash or other nutrients, and in that case we  
12 don't see it as a fertilizer, so just an  
13 improvement to water quality.

14 And in terms what we really feel  
15 is that this still improves the conditions of  
16 our soil and improves the conditions of our  
17 water, making our production process more  
18 sustainable. I'm open to any questions you  
19 might have.

20 CHAIR STONE: Francis?

21 MEMBER THICKE: Thank you, Juan.

22 MR. BELTRAN: Yeah.

1                   MEMBER THICKE: Before you used  
2                   sulfurous acid, are you familiar with anything  
3                   else that will do similar -- will help in the  
4                   same way, or have you tried anything else?

5                   MR. BELTRAN: Yeah, we've been  
6                   growing organic berries since 2003 in Mexico,  
7                   and we started out in Baja with strawberries.  
8                   And we starting using citric acid. But the  
9                   reality is that it's benefits to the -- in low  
10                  -- in such a high pH water, we really didn't  
11                  see it, you know.

12                  It wasn't until we started using  
13                  the sulfur burners that we actually see a  
14                  sufficient enough reduction in the pH in the  
15                  water, and by eliminating the decarbonates and  
16                  carbonates in it that we really see some  
17                  potential for making an economically viable  
18                  production.

19                  It's also the -- we -- it's not  
20                  like we're just using the sulfur burners.  
21                  We're also using the compost and everything.  
22                  But in certain soils and certain water

1 sources, I see it as the only viable option.  
2 It's not for everything, you know. It's  
3 certain types of soils and certain types of  
4 waters that we have.

5 CHAIR STONE: Okay. Harold?

6 MEMBER AUSTIN: Yeah, Juan -- over  
7 here -- compared to the applications -- in  
8 water and stuff, in the treatments prior to  
9 the -- using the sulfur burner and forming  
10 this sulfurous acid, do you see a significant  
11 variation in the amount -- in the inputs that  
12 you're having to add to the soil before versus  
13 now that you're using, you know, the sulfur  
14 burners and the conditions that this is doing  
15 to your soil and the treatments as far as the  
16 additives that you're having to put in, the  
17 other inputs?

18 MR. BELTRAN: Yeah, basically what  
19 -- this is my first year managing a farm with  
20 sulfur burners. And it's really changing how  
21 we try to improve or incorporate different  
22 materials to the soil.

1                   Right now we're moving more into  
2                   compost and blood meal and bone meal. And  
3                   we're less dependent in calcium sulfate, for  
4                   example, and other sources of nutrients, and  
5                   also in micro-nutrients. So we started moving  
6                   more to these blood meal, bone meals and  
7                   compost because we see that now it's working  
8                   in the soil. As in the past, we had to be  
9                   more dependent in potassium sulfate in one  
10                  sense, and calcium sulfate and other  
11                  micro-elements to be able to grow good enough  
12                  production.

13                  CHAIR STONE: Thank you, Juan.  
14                  Thank you --

15                  MR. BELTRAN: Thanks.

16                  CHAIR STONE: -- very much.

17                  Kurt Jacobsen is at the podium,  
18                  and Morgan Tittle is on deck.

19                  MR. JACOBSEN: Good afternoon. My  
20                  name is Kurt Jacobsen, and I'm the National  
21                  Organic Supply Manager for Driscoll's, and I'm  
22                  here to support the relisting of sulfurous

1 acid on behalf of our independent organic  
2 growers and on behalf of Driscoll's as a  
3 whole.

4 I've been with the company a  
5 little over a year, so I don't have extensive  
6 experience, but I've heard a lot about the  
7 sulfur burner and the experience of our  
8 growers, and I feel like it's very important  
9 that we relist this product.

10 Our mission as a company is to  
11 delight our berry consumers through alignment  
12 with our customers and our growers. And I  
13 mention that because we function with function  
14 with an independent grower base. Some people  
15 may look at Driscoll's and see this big  
16 entity, but what we really are is a network of  
17 small independent growers, especially on the  
18 organic side.

19 One of our biggest focuses as an  
20 organization is to ensure the long term health  
21 of our grower base. We do everything we  
22 possibly can to make sure that our growers

1 have a healthy deal and so we provide all the  
2 support we possibly can to make sure that our  
3 growers can farm successfully, sustainably for  
4 a long time, earn some money and grow their  
5 business.

6 Which brings me to the sulfur  
7 burner and the on-farm generation of the  
8 sulfurous acid. I read a bunch of the  
9 supporting documents and I think the point  
10 that says it best is that sulfurous acid  
11 provides organic farmers the ability to amend  
12 irrigation water exactly the same way that  
13 nature does, and by recreating the properties  
14 of natural rainwater in our irrigation water,  
15 we improve soil conditions and soil health.  
16 That's it in a nutshell.

17 I recommend reading the full  
18 report. I don't know how many people here  
19 have read it; I'm sure you guys all have. But  
20 it's fascinating, it's interesting, and to me  
21 it's a no-brainer. I mean it's a fabulous  
22 system. It reduces soil pH, reduces the pH of

1 the water, it allows better uptake of  
2 nutrients, it helps dissolve salts and leach  
3 salts out of the soil. I mean it's quite an  
4 amazing technology, and it's a great  
5 technology, and we should continue -- let our  
6 growers use it.

7 You heard Juan, there's other  
8 examples in the public documents about showing  
9 a decrease in pH, showing changes in nutrient  
10 levels. So I think it's just a really  
11 important tool. We have a limited toolbox,  
12 it's one that we need to keep. So I highly  
13 encourage the Board to relist sulfurous acid  
14 on behalf of our organic growers.

15 CHAIR STONE: Thank you, Kurt.

16 MR. JACOBSEN: All right.

17 CHAIR STONE: Thank you very much.

18 Morgan Tittle is up, and Patty  
19 Lovera is on deck.

20 MR. TITTLE: Thank you for  
21 allowing me to address the Board today. I  
22 represent a family farm on the central coast

1 of California where we grow raspberries,  
2 blackberries and blueberries. I'm here today  
3 to also express my support of sulfurous acid  
4 and the use of sulfur burners.

5 Like Juan and Kurt have expressed  
6 before me, there are many benefits for the  
7 use. In my opinion, the main benefit and the  
8 best benefit to growers is that it is the best  
9 alternative that we have. Other alternatives  
10 are sulfurous acid or citric acid, which are  
11 very dangerous and very -- pose a great risk  
12 to the environment.

13 The sulfurous acid and the sulfur  
14 burner uses 99.9 percent pure elemental sulfur  
15 and I don't think it takes a whole bunch of  
16 chemistry experience to know that a 50-pound  
17 bag of sulfur is going to be much more safe to  
18 work with and to store than a 300 gallon tank  
19 of liquid acid.

20 As Juan and Kurt have also  
21 mentioned, that it allows us to be more  
22 efficient with our irrigation and with our

1 nutrient applications. In California we've  
2 experienced many winters below average  
3 rainfall, and as a result we have had a  
4 buildup of salts and bicarbonates in our soil,  
5 leading to the death and deterioration of our  
6 crops.

7           With the sulfur burners, we were  
8 able to leach away these salts and  
9 bicarbonates and once again restore a healthy  
10 productive growing environment in our soil.

11           Also being more efficient with our  
12 fertilizer has many impacts, not only  
13 financially, but also to the environment. For  
14 example, if I wanted to -- before the use of  
15 the sulfur burner, I might have had to apply  
16 10 units of nitrogen per week. With this use  
17 of sulfur burner, I can now cut that  
18 application to maybe seven or eight units of  
19 nitrogen and still achieve the same or greater  
20 effects.

21           As a grower we are constantly  
22 under pressures and regulations and constantly

1       losing tools, and as an organic grower, we  
2       already have a very limited toolbox. I think  
3       that sulfurous acid and sulfur burners are  
4       essential and a great benefit to growers not  
5       only organically but also conventionally.  
6       Thank you, and I'm open to any questions.

7                   CHAIR STONE: Thank you, Morgan.

8                   Oh, I'm sorry. Harold?

9                   Morgan, I'm sorry, we had one.

10       Harold over here has one.

11                   MEMBER AUSTIN: Morgan, thank you  
12       for coming to testify before the Board today.  
13       We appreciate everybody that's willing to take  
14       the time out of their busy schedules,  
15       especially a family farm, and come and share  
16       your thoughts and concerns with us as a Board.

17                   With the sulfurous acid that  
18       you've been using, how long have you been  
19       using that?

20                   MR. TITTLE: Since 2011.

21                   MEMBER AUSTIN: Can you explain to  
22       us the differences on your family's farm that

1 you've been able to experience and see from  
2 before you started to use it to now, you know,  
3 looking -- you know, taking into consideration  
4 that you're not putting on a water now that's  
5 an 818283, you're now putting on a more  
6 neutral-based water, what are the impacts that  
7 you're seeing that you feel it's doing?

8           You've talked a little bit about  
9 the reduction in the amount of inputs that  
10 you're putting on. What about soil -- are you  
11 pulling any soil samples looking at microbial  
12 activity, and then how do you relate that to  
13 plant development and growth and health?

14           MR. TITTLE: Yes, sir, I pull soil  
15 samples all throughout the season at various  
16 stages of production and growth of the plant.  
17 Soil samples are a tool that I use for many  
18 different things. It's kind of difficult to  
19 put a number on it, but kind of an overall  
20 observation, our plants have much more vigor,  
21 much healthier looking plant.

22           As I'd mentioned, we can be more

1 -- not only more efficient with our fertilizer  
2 application, but the plants can all begin to  
3 utilize the nutrients that are already in the  
4 soil, many of which are micro-nutrients that,  
5 for one, are difficult to find a reputable  
6 source, and two, are difficult for plant  
7 uptake. So the use of the sulfur burner and  
8 sulfurous acid has given us a huge benefit in  
9 that aspect.

10 Also, as I mentioned, leaching  
11 away the salts, opening up pore space for  
12 water infiltration and oxygen, has greatly  
13 helped us maintain and improve the health of  
14 our soils. Thank you.

15 CHAIR STONE: All right. Again,  
16 thank you very much for your time.

17 Patty Lovera, and Bev Walker on  
18 deck. Thank you, Patty.

19 MS. LOVERA: Okay. Hi. My name's  
20 Patty Lovera, and I'm from Food and Water  
21 Watch, which is a consumer advocacy group, and  
22 we're also a member of the National Organic

1 Coalition.

2                   So before I get to some of the  
3 things that are on the agenda for this  
4 meeting, I did want to echo what we've heard  
5 from other folks today about our  
6 disappointment about some of the things that  
7 have changed for this meeting, including the  
8 Board being told that the capacity of the NOP  
9 can limit what the Board is able to talk  
10 about.

11                   So we spend a lot of time,  
12 actually more time on kind of conventional  
13 food and all of the issues in conventional ag,  
14 than we actually do on organic. But we get  
15 asked a lot how they're different. And this  
16 process is one of the things I bring up.

17                   I don't get to go anywhere else in  
18 the food system and have these conversations  
19 about what the rules are, what the standards  
20 are and consumers don't either. This is a key  
21 difference, and it is disappointing to see the  
22 scope of what can happen here at this place

1 where the organic community is supposed to  
2 figure stuff out be limited in that way.

3 And then I think not surprisingly  
4 we're also pretty disturbed by what's going on  
5 with the changes to the Sunset process. We've  
6 heard the conversation this morning about some  
7 of the semantics of how the rule works.

8 I remain unconvinced, I think a  
9 lot of other people remain unconvinced, and,  
10 you know, we might get into two meetings  
11 versus one and what happens in what sequence,  
12 but I think the bottom line for the folks that  
13 I'm representing, and what more and more  
14 consumers are going to start to understand, is  
15 that the default is that stuff stays on the  
16 list, and the things that they wish were  
17 starting to come off, it's going to take a lot  
18 more work to do that.

19 And that sends the wrong signal,  
20 and I think it's just going to chip away, it's  
21 going to continue to chip away at the  
22 confidence that people have in the label. And

1 I think it was Jay who said this morning that  
2 we're streamlining this process at the expense  
3 of public trust. And there is a long term  
4 cost to that that you're not going to be able  
5 to get back if people start to think that  
6 there isn't a way to improve these standards.

7 So there are a couple of things on  
8 the agenda that kind of speak to the Sunset  
9 process, which has not been a treat to date.  
10 We've struggled with it. Right? So  
11 streptomycin is one of them. I will point you  
12 to two of our comments.

13 We included a petition from over  
14 12,000 of our supporters who are urging the  
15 Board not to extend the expiration date for  
16 streptomycin. We've had this conversation  
17 before.

18 A year ago we were pleased when  
19 the Board voted not to extend the use of  
20 tetracycline and I think the case is even more  
21 compelling for streptomycin in terms of the  
22 residue data you had in there, and the

1 conversation about who's actually using it,  
2 and how essential that it is.

3           And again, this is just in the  
4 context of the public having a conversation  
5 and more and more and more people are becoming  
6 aware of antibiotics, the fragile resource  
7 that they are, and the role of any use of  
8 antibiotics anywhere, that it chips away at  
9 this tool that we're not really putting new  
10 antibiotics in our toolbox of what we can use  
11 to treat disease.

12           So we're having a conversation  
13 with folks about conventional agriculture,  
14 we're talking to city councils all over the  
15 country, and they're doing resolutions to urge  
16 Congress to take action on antibiotic use in  
17 conventional livestock.

18           And antibiotics -- organics should  
19 be on the right side of this issue and be able  
20 to say with no asterisk, no exceptions, We  
21 don't use them. That's where organics should  
22 be, and that's where organic consumers want

1 organic to be.

2 So another Sunset issue is  
3 methionine. It's time for that to end as  
4 well. It's really hard to say there's an  
5 incentive to find alternatives if there's  
6 constant, constant, constant exceptions and  
7 extensions, and it really starts to seem like  
8 an idle threat that you have five years to  
9 find an alternative if we're constantly  
10 getting another five years.

11 And not shockingly, on aquaculture  
12 we don't think you can approve these materials  
13 until you define what an aquaculture system  
14 is, the range of what is called aquaculture is  
15 enormous, from open ocean farms we don't think  
16 should be anywhere near the label of organic,  
17 to much smaller land-based closed  
18 recirculating systems that maybe we can figure  
19 out.

20 But until we define what's  
21 organic, I don't know how you evaluate these  
22 materials against all of the rules that you're

1 supposed to do when you consider those. So  
2 I'll stop there.

3 CHAIR STONE: Thank you, Patty.  
4 Very well stated. All right. Thank you very  
5 much.

6 (General applause.)

7 CHAIR STONE: Bev Walker to the  
8 podium, and Mike Durschmid on deck.

9 MS. WALKER: Hi, I'm Beverly  
10 Walker. I'm a concerned consumer. I'm a  
11 member of the Cornucopia Institute, and I'm  
12 here today as a citizen lobbyist.

13 I volunteered to help present  
14 testimony because I want to ensure the  
15 integrity of organic food. I don't think the  
16 word "organic" should be -- or its label  
17 should be adulterated.

18 I will comment on the two  
19 livestock proposals before you: synthetic  
20 methionine in organic poultry production and  
21 acidified sodium chlorite as a teat  
22 disinfectant. We support the livestock

1       subcommittee amendment for synthetic  
2       methionine, believing it will allow some  
3       flexibility to adjust the methionine levels  
4       based in the state of life of the bird.

5                       That said, we encourage a more  
6       holistic approach to poultry management that  
7       will reduce the dependence on synthetic  
8       methionine. Some of the practices we would  
9       like to see more organic poultry producers  
10      incorporate include access to healthy growing  
11      pasture, not just a concrete porch; stocking  
12      densities that allow pastures to maintain  
13      vegetative cover and natural biodiversity to  
14      thrive.

15                      Sufficient pop holes in the  
16      chicken house to encourage outdoor foraging;  
17      management practices that include opening  
18      doors as much as possible; locating some feed  
19      and water outside to encourage foraging;  
20      utilizing slower growing or heritage chicken  
21      breeds that are capable of superior foraging;  
22      a varied diet of diverse nutritious foods, not

1 just corn and soy; natural supplements that  
2 could include herbal, methionine or non-GMO  
3 fermented methionine when those become  
4 available.

5 Our stance is that if this  
6 adjusted methionine proposal is approved, it  
7 should be expected to Sunset in five years, if  
8 research shows alternative management  
9 practices and/or natural supplements can  
10 supply adequate levels of methionine for  
11 poultry health.

12 We encourage the NOSB and the USDA  
13 to support aggressive research into the  
14 alternatives to synthetic methionine. We also  
15 support a resolution by the NOSB to Sunset  
16 this material in 2019.

17 For the second proposal on  
18 acidified sodium chlorite, we agree with  
19 livestock subcommittee that this product is  
20 not necessary in organic production.  
21 Therefore we encourage you to reject the  
22 petition to list acidified sodium chlorite.

1                   This material does not appear to  
2                   have wide support in the organic industry.  
3                   The technical report states,

4                   "International regulations regarding the  
5                   use of acidified sodium chlorite solutions in  
6                   organic agricultural production, processing  
7                   and handling are lacking. Presumably that  
8                   means the acidified sodium chlorite is not  
9                   approved for organic livestock under  
10                  international organic regulations."

11                  The livestock subcommittee deemed  
12                  it unnecessary after speaking to organic  
13                  farmers. We agree that you should reject this  
14                  petition.

15                  Thank you very much for allowing  
16                  me to present testimony. If there are any  
17                  questions, please speak with one of the staff  
18                  members at Cornucopia. Thank you.

19                  CHAIR STONE: Thank you, Bev.

20                  (General applause.)

21                  CHAIR STONE: Mike Durschmid, and  
22                  Zak Wiegand is on deck.

1 Mike?

2 MR. DURSCHMID: How are you doing?  
3 My name's Mike Durschmid. I'm a member of the  
4 Organic Consumers Association. Today,  
5 representatives of the Organic Consumers  
6 Association's March Against Monsanto San  
7 Antonio staged their protest here at the NOSB  
8 meeting.

9 Changes to the process of removing  
10 organic ingredients and materials from the  
11 NOP's National List of substances allowed and  
12 prohibited in products certified as organic,  
13 the damages made without the due process or  
14 input from the public endorsed as organic  
15 standards and will result in the list of  
16 synthetic and non-organic ingredients and  
17 materials allowed in organic to grow  
18 increasingly and irreversibly longer.

19 For more than a decade, the  
20 process of deciding what ingredients and  
21 materials are allowed in organic has been  
22 fairly democratic. The OCA routinely attends

1 NOSB meetings on behalf of more than one  
2 million of its representatives.

3 Under the new provision, it will  
4 be extremely difficult to get non-organic  
5 materials and ingredients removed from the  
6 list. Our protest today is intended to draw  
7 attention to the threat that this new process  
8 poses to organic standards, the arbitrary  
9 manner in which the process was challenged --  
10 or changed and to demand that the changes be  
11 revised.

12 Non-organic materials targeted for  
13 removal. OCA's Save Organic Standards  
14 campaign has targeted several non-organic  
15 materials for removal from the National  
16 Organics List. These include carrageenan, a  
17 thickener and emulsifier, with no natural  
18 nutritional value that is harmful to humans'  
19 health. OCA's petition to remove carrageenan  
20 from the National List has been signed by  
21 15,000 organic consumers.

22 Methionine, a cheap synthetic feed

1 additive that provides an essential amino acid  
2 needed by fast growing chickens raised without  
3 access to pasture on the nutritional --  
4 nutrition and poor diet of corn and soy.  
5 OCA's petition demanding real outdoor access  
6 for organic chickens has been signed by 36-,  
7 nearly 37,000 organic consumers.

8 Synthetic nutrients, vitamins and  
9 minerals, a group of synthetic ingredients  
10 illegally added to National List en masse  
11 without individual approval. Synthetic  
12 nutrients can disrupt normal metabolistic  
13 functions with devastating side effects.  
14 OCA's petition to remove synthetic nutrients,  
15 vitamins and minerals from the National List  
16 has been signed by 17,000, or actually nearly  
17 18,000 organic consumers.

18 Mutant microgenes created in a lab  
19 using radiation and chemical to provide  
20 mutagens, including DMS -- or DSMs and DHA and  
21 ARAs, which have been linked to severe gastric  
22 diseases or distress, prolonged periods of

1 vomiting and painful bloating. OCA's petition  
2 to ban mutagens from organic has been signed  
3 by 11,470 organic consumers.

4 Sausage casings from the  
5 intestines of non-organic animals likely  
6 raised on factory farms and feed slaughter  
7 waste. This practice has given rise to a form  
8 of human mad cow disease called CJD, often  
9 mis-diagnosed as Alzheimer's Disease.

10 Because of the changes Mr. McEvoy  
11 has made to the Sunset process, these  
12 problematic non-organic materials will likely  
13 be allowed to stay on the National List and in  
14 USDA certified organic foods.

15 CHAIR STONE: Thank you, Mike.  
16 Zak Wiegand, and Laura Batcha's on  
17 deck.

18 MR. WIEGAND: All right.

19 CHAIR STONE: Thank you.

20 MR. WIEGAND: Good after -- well,  
21 it's good evening now. My name is Zak  
22 Wiegand, and I am the Processing Program

1 Technical Specialist for Oregon Tilth.

2 Oregon Tilth is a non-profit  
3 membership-based organization that promotes  
4 sustainable agriculture through education,  
5 research, advocacy, and certification. We  
6 certify over 1400 farms, handlers across  
7 borders, pretty much internationally.

8 We at Oregon Tilth would like to  
9 thank the compliance and accreditation and  
10 certification subcommittee for their work on  
11 the request for NOP clarification on guidance  
12 -- guidance for retail certification.

13 As you already know, there's a  
14 growing interest in voluntary retail  
15 certification, and as such there's a definite  
16 need for clarification and guidance to help  
17 this portion of the industry progress. Based  
18 on this topic, we feel that you have further  
19 voiced this opinion.

20 All right. As noted in the  
21 proposal there's an inconsistency in  
22 interpretation of the regulations surrounding

1 retail operations. We have participated in  
2 discussion with other accredited certifiers  
3 and it is clear that not everyone is on the  
4 same page.

5 Because of the division in the  
6 interpretation, we agree that the request for  
7 clarification from the NOP that is included in  
8 this proposal.

9 We've also reviewed comments  
10 submitted by the Organic Trade Association and  
11 the Accredited Certifiers Association, their  
12 -- and their comments echo the same concerns  
13 with the lack of clear guidance from the NOP  
14 as well as necessary resources for industry.

15 Overall we feel this proposal  
16 addresses points of clarity needed in the  
17 world of retail certification, which will  
18 allow for easier entry, increased  
19 understanding and support for voluntary  
20 certification of retail operations. So thank  
21 you again for your work on this proposal.

22 CHAIR STONE: Thank you, Zak.

1 Questions?

2 (No response.)

3 CHAIR STONE: Thank you very much.  
4 Thanks for taking time.

5 Laura to the podium, and Diana  
6 Elizalde, yeah, please correct, Elizalde, on  
7 deck.

8 MS. BATCHA: Hi. Just to wake you  
9 up. I know it's been a long day. So first I  
10 just want to say that we appreciate all of you  
11 being willing to sit in your chairs and go  
12 through what has been a long first day of the  
13 Board meeting here, and we really do  
14 appreciate that you're still continuing to sit  
15 here and indulge us with our comments.

16 So I'm Laura Batcha. I'm the  
17 Executive Director of the Organic Trade  
18 Association and I'm here to provide comments  
19 on behalf of our membership, as well as on  
20 behalf of the Organic Center, a non-profit  
21 research and education organization that  
22 operates under the umbrella of the Trade

1 Association.

2 We represent certified organic  
3 operators of all sizes and points in the  
4 supply chain. Everything from single  
5 owner-operator farms and ranches to first  
6 handlers, branded manufacturers, distributors  
7 and retailers throughout the supply chain, and  
8 over half of our members are small businesses  
9 below a million dollars a year in gross sales.

10 We use a task force system to get  
11 a range of views from our membership that's  
12 really helpful for us in trying to provide  
13 some meaningful comments to you all.

14 I'm passing around two things.  
15 One is a summary of our comments. You guys  
16 have received all our written comments, I'm  
17 not going to go through them in too much  
18 detail now. But also a copy of a report that  
19 the Organic Center just released this spring  
20 coming out of the Board meeting with the  
21 determination to expire the use of  
22 tetracycline for apple and pear production.

1                   The Organic Center invested  
2                   financial resources in compiling the most  
3                   relevant and current information from growers  
4                   about how to use organic compliant protocols  
5                   to produce apples and pears without the use of  
6                   antibiotics that came out this spring.

7                   We've been working through Ag  
8                   Extension and other ag groups across the  
9                   country to get the publication in the hands of  
10                  growers. If you have grower networks that you  
11                  think can benefit from this information --  
12                  that couldn't possibly be three minutes,  
13                  Michelle. I think it was running when I got  
14                  up here, so I'm going to -- if you indulge me,  
15                  I'm just going to finish up here.

16                  So take a look at the publication,  
17                  help us spread it around.

18                  I have two areas I want to focus  
19                  on. One is research priorities. We gave you  
20                  written comments and we really support all of  
21                  the priorities you've identified, but we have  
22                  sort of two key thoughts for you here.

1                   One is that anything you can do to  
2                   get that list of priorities consolidated into  
3                   some theme so that you can really send a  
4                   strong message about what the true priorities  
5                   should be. For us, our recommendation to you  
6                   would be the top of that list would be natural  
7                   alternatives to synthetics on the National  
8                   List.

9                   We need some help and public  
10                  investment into this research so that we can  
11                  find these alternatives and move forward in a  
12                  way that is not disruptive to growers and  
13                  ranchers and hard-working certified operators,  
14                  meets the needs of the public to minimize the  
15                  use of synthetics in organic, and provide for  
16                  judicious review. So if you guys do anything  
17                  in your research priorities, send that strong,  
18                  clear message.

19                  The other thing is we need organic  
20                  representation on those boards that advise the  
21                  Secretary on how to use public funds to  
22                  support research. So we have to have our

1 voice in those boards like we have our voice  
2 here in this room. So we encourage you to  
3 pursue that.

4 The other area I want to talk  
5 about is the GMO seed purity discussion  
6 document, and recognize a momentous challenge  
7 you guys have taken on in even beginning this  
8 discussion. So I know it's been very, very  
9 difficult.

10 We have recognized that seed  
11 purity is the foundation of being able to  
12 provide an organic product to the consumer  
13 that meets their expectations in terms of  
14 non-GMO status for that final product and  
15 throughout the supply chain.

16 We think it's fantastic that the  
17 program has already suggested that the work  
18 plan could include some work on  
19 recommendations for best practices to minimize  
20 commingling and contamination of the supply  
21 chain.

22 Certifiers and inspectors need

1 training on how to utilize the residue testing  
2 rule in a way that is well-informed in terms  
3 of the methodology that they choose when they  
4 pull tests and where they pull tests and that  
5 they have the skills to conduct these  
6 investigations that are required whenever they  
7 find positives.

8 We really recognize that a lot of  
9 stakeholders have raised some very important  
10 issues in the challenges of implementing a  
11 seed purity standard in organic, and those --  
12 in my mind, the most important of them are can  
13 we do this in a way and move forward where no  
14 organic farmer gets left behind, because I  
15 think we all agree on how important that is.

16 And in addition to that, this  
17 well-founded belief in the organic community  
18 that the organic producers and handlers  
19 shouldn't be the ones who continue to take on  
20 the burden and the cost of contamination  
21 prevention and testing in the marketplace.

22 So as our task force explored

1 this, and we identified it a little bit in our  
2 comments, but I want to put it out there as  
3 what might be a creative idea to continue  
4 forward on your work here. And the idea is --  
5 the program outlined this morning that the 5  
6 percent requirement for residue testing  
7 already applies to GMOs and investigations are  
8 required in the organic system.

9 Consider and get some stakeholder  
10 input perhaps on this idea that a seed purity  
11 standard could be applied to non-organic seed  
12 that's utilized on organic farms under the  
13 commercial availability provision for crops  
14 that have deregulated comparables that the  
15 seed provider could be required to provide on  
16 the seed bag as part of the certificate  
17 analysis a declaration of seed purity, and  
18 that this would be the way that certifiers  
19 would verify that the non-organic seed met the  
20 requirements for not including excluded  
21 methods.

22 So when the seed comes outside of

1 the organic system, require that under that  
2 commercial availability the seed bag declare  
3 its seed purity status. The seed providers  
4 will be responsible for that testing and  
5 declaration.

6 And it would go a long way I think  
7 to incentivize organic production in seed,  
8 protect our farmers and help us take a baby  
9 step towards this. So that's our idea.

10 Questions?

11 CHAIR STONE: Very good. Thank  
12 you, Laura. You don't win the mug.

13 (General laughter.)

14 MS. BATCHA: It was already  
15 rolling when I got --

16 CHAIR STONE: I know.

17 MS. BATCHA: -- up here, Mac.

18 CHAIR STONE: I know.

19 Any questions? Hang on, Laura.

20 Question, John?

21 VICE CHAIR FOSTER: So on that  
22 last idea, did you talk about that with the

1 certifier -- the certification community  
2 knowing -- I mean they'd have to go through  
3 the verification of that and to what extent  
4 have you kind of talked to either ACA or other  
5 certifiers --

6 MS. BATCHA: Yeah, it's --

7 VICE CHAIR FOSTER: -- about that?

8 MS. BATCHA: -- it's not a simple  
9 idea and it just came up in the last couple of  
10 weeks as our task forces really struggled with  
11 how do you move forward and take a step and  
12 meet all the needs that have been identified.  
13 So it hasn't been fully vetted with the  
14 certification community, and it should be.

15 But I will say they already verify  
16 all non-organic ingredients that come into the  
17 system. John, you know this, it's just done  
18 through affidavits, and this is just a way to  
19 say, A paper signed affidavit isn't quite  
20 enough in regards to our seed purity. Right?

21 CHAIR STONE: Jay?

22 MEMBER FELDMAN: Hey, Laura. I

1 don't want to put you on the spot, so you  
2 don't have to answer this, but I'll give you  
3 the chance if you'd like to. You know, you've  
4 been listening today to all these comments on  
5 Sunset and these changes, and obviously you  
6 work with an industry that relies heavily on  
7 consumer trust, and we all want to see that  
8 industry grow.

9 Are there any things that you've  
10 heard today that you view as potentially  
11 problematic in terms of long term, and, you  
12 know, preserving trust and growing the market?

13 MS. BATCHA: Thanks, Jay. I  
14 haven't had a chance to review Consumer  
15 Reports' survey because it just came out, but  
16 I'm looking forward to it, and we have a  
17 tremendous amount of respect for the work that  
18 those folks do. So I'm looking to digging  
19 into that. We do surveys every year.

20 The consumer trust in the seal is  
21 the most important thing for the long-term  
22 viability of organic agriculture, food and

1 farming. We believe that that trust is really  
2 a three-legged stool. It includes judicious  
3 review of synthetics that are used only when  
4 that OFPA criteria is met, and the judicious  
5 regular review of those through the Sunset  
6 process.

7 It also includes standards  
8 development that keeps up with the expectation  
9 that the consumer has for what the organic  
10 seal means. We were thrilled to hear not only  
11 spoken, but in the presentation, that there is  
12 the intention to use some of this capacity to  
13 move forward animal welfare standards within  
14 the National Organic Program.

15 This is something that's a long  
16 time coming with a tremendous amount of  
17 debate, and is one of the single most  
18 important things that can shore up confidence  
19 long term.

20 I think the third leg of that  
21 stool is the compliance and enforcement. And,  
22 we've got to continue to encourage the program

1 to shorten those appeal times, and you guys  
2 are doing a tremendous amount of good work on  
3 this.

4 I think I raised for you guys  
5 yesterday, Jay, and interested in further  
6 discussion that we're concerned about that 50  
7 percent of complaints that are out -- or  
8 uncertified operations that fall into a black  
9 hole where there's no ability for anybody to  
10 follow up on these. The FTC's not taking up  
11 the issue, it's outside of the jurisdiction  
12 for NOP to follow up on the complaints.

13 So there are three important areas  
14 we need to focus on in terms of that consumer  
15 confidence.

16 So what I've heard today but I  
17 think -- I'm not sure I would characterize it  
18 as a concern, but the discussion resonated  
19 with me and I'm not sure you guys got all the  
20 way there, were some of the questions that you  
21 had, Jean, trying to clarify how the role of  
22 the subcommittee and the full Board plays out

1 under the new Sunset process.

2 And I encourage you to follow that  
3 thread. I serve on a FACA board where I'm in  
4 the minority, and there's basically five of us  
5 of 15 in AC 21, and I know at the end of the  
6 day there are a lot of things that will not go  
7 the way I want them to in the end, but I  
8 really find it important to have my voice and  
9 my say, and make sure that I understand that  
10 there's going to be room for that.

11 So you guys keep pulling that  
12 thread and find out what you need for  
13 assurance so the subcommittee brings the  
14 discussion to the full Board, and then if you  
15 all feel like you need to be on the record on  
16 every vote, express that and try to engage  
17 that as a request.

18 Because I think that that would be  
19 an understandable need on behalf of the  
20 volunteers to make sure that those things get  
21 brought forward. So that interested me the  
22 most in that follow-up discussion. So I know,

1 Jean, you were leading that. I encourage you  
2 to continue to pull that thread.

3 CHAIR STONE: Great. Thank you,  
4 Laura. Thank you very much.

5 (General applause.)

6 CHAIR STONE: Diana, you hiding  
7 behind the post over there I think.

8 MS. ELIZALDE: Sorry.

9 CHAIR STONE: Very good. You can  
10 complete the oral testimony today. Thank you.

11 MS. ELIZALDE: Hello. My name is  
12 Diana Elizalde, and I live here in San  
13 Antonio, Texas. I'm going to be very brief.  
14 Earlier this morning, a person here challenged  
15 me with technical jargon. He also asked me if  
16 I believed everything I read.

17 I could not answer him at that  
18 time. And I just want to say something.  
19 There are people that use their knowledge to  
20 help and educate other people. And there are  
21 other people that use their knowledge to  
22 overpower the less educated people.

1                   The truth is I am just an average  
2 citizen searching for a healthier way of life.  
3 I do not know any of the technical terms of  
4 the exact name of all the synthetic  
5 ingredients that are being added to organic  
6 food. That's the reason I am here, to get  
7 educated, not to get offended by people that  
8 have more knowledge that I do.

9                   When I first discovered organic  
10 food, I immediately started buying products  
11 with a USDA organic label. I fed my daughter  
12 organic formula, thinking that it was the best  
13 choice. Two years later, I found out that  
14 this formula contained several synthetic  
15 ingredients.

16                   I had to recognize it was my fault  
17 for not reading the labels. And I was also  
18 uneducated. I was new to organic. And to  
19 this day I'm still no expert about the  
20 subject. That's why I'm here.

21                   But one thing I do know is that  
22 something cannot be completely or 100 percent

1 organic if it has anything synthetic in it, or  
2 any synthetic ingredients.

3 When I go grocery shopping and I  
4 see the USDA organic label, that is the  
5 product I choose in good faith. My loved ones  
6 and I are the ones eating this type of food.  
7 I don't promote the consumption of this  
8 organic food to scientists, or activists or  
9 other people with certification in organic  
10 food.

11 I try to promote -- I'm sorry -- I  
12 promote the consumption of organic food to  
13 friends and family. How can I continue to  
14 promote organic food if most people in my  
15 community believe organic food is a hoax?

16 Contrary to popular belief, the  
17 USDA organic label has been losing  
18 credibility. Someone mentioned earlier that  
19 they were trying to be as transparent as  
20 possible.

21 Let me say something, trying is  
22 doing something with the intention of fail,

1 therefore trying to be transparent as possible  
2 is not enough. You have to do everything in  
3 your power to make it transparent.

4 My question today is, why does the  
5 Board need to bid on synthetic ingredients  
6 that can be added to organic food? That is  
7 not even -- that shouldn't even be a question.  
8 Synthetic ingredients should not be in organic  
9 food period. Adding synthetic ingredients to  
10 organic food defeats the whole purpose and it  
11 goes against its own principle.

12 If you keep approving synthetic  
13 ingredients in organic food, there's a big  
14 chance that it will never stop. Adding  
15 synthetic ingredients is unacceptable and it  
16 needs to stop immediately. If you continue  
17 approving synthetic ingredients, we'll be back  
18 to square one where we don't even know what's  
19 in our food again.

20 The comments of this citizen --  
21 the comments of the citizens here today must  
22 be taken into consideration because we are the

1 consumers and we are the ones buying. We are  
2 the ones going to the grocery store, and when  
3 we go grocery shopping, we want to know that  
4 the food we are buying is 100 percent organic,  
5 and it's been raised and grown with  
6 traditional organic practices.

7 The USDA was established to  
8 protect the welfare of the people and not for  
9 industry pocketbooks. Please don't let the  
10 USDA organic label lose the credibility and  
11 trust of the people. Don't let organic food  
12 turn into an illusion. Let's keep organic  
13 food real. Thank you.

14 (General applause.)

15 CHAIR STONE: Thank you, Diana.

16 That concludes the agenda for  
17 today. I wanted to take a little latitude of  
18 the Chair, and we have a t-shirt that I think  
19 goes to the most heartfelt of the comments  
20 today.

21 Cynthia, I'd like you to have this  
22 t-shirt.

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MS. KURKOWSKI: Oh, thank you.

(General applause.)

CHAIR STONE: Thank you for, all of you, for taking your time as individuals, and for the work that you do on behalf of the organics in a greater scale.

So tomorrow we'll reconvene at 8:30, and we're scheduled to recess at 5:30 tomorrow afternoon. So thank you all for your attention.

And, Board, thank you all very much. And, see you in the morning.

(Whereupon, at 6:27 p.m., the meeting was adjourned.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board

Before: Department of Agriculture

Date: 04-29-2014

Place: San Antonio, Texas

was duly recorded and accurately transcribed under  
my direction; further, that said transcript is a  
true and accurate record of the proceedings.



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Court Reporter

**NEAL R. GROSS**

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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)

+ + + + +

WEDNESDAY  
APRIL 30, 2014

+ + + + +

The National Organic Standards Board convened at 8:32 a.m. at the Saint Anthony Hotel, 300 East Travis Street, San Antonio, Texas, Robert "Mac" Stone, Chairperson, presiding.

MEMBERS PRESENT

ROBERT "MAC" STONE, Chairperson  
JOHN FOSTER, Vice Chairperson  
CALVIN WALKER, NOSB Secretary  
HAROLD AUSTIN  
CARMELA BECK  
COLEHOUR BONDERA  
JOSEPH DICKSON  
TRACY FAVRE  
JAY FELDMAN  
WENDY FULWIDER  
NICHOLAS MARAVELL  
JEAN RICHARDSON  
ZEA SONNABEND  
JENNIFER TAYLOR  
FRANCIS THICKE

STAFF PRESENT

MILES McEVOY, Deputy Administrator, National  
Organic Program

MICHELLE ARSENAULT, Advisory Board  
Specialist

MELISSA BAILEY, Director, Standards  
Division, National Organic Program

LISA BRINES, Standards Division, National  
Organic Program

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

(8:32 a.m.)

CHAIR STONE: We've got quite a bit of public comment to work through this morning, a little bit into the afternoon and then the committee deliberations will start mid-afternoon, I believe.

Is there any questions from Board Members, any thoughts before we get started here? You're good? I see Michelle is getting some PowerPoints squared away there.

(Pause.)

CHAIR STONE: Okay, we are all here and we want to stay on schedule. We want to give everybody time to present. We want to have the Board time for questions. I think it worked well. I appreciate the Board Members for their respectful judicious use of questions and time yesterday. I thought it worked well.

Audience members, I very much appreciate the respect for the time slot. I

1 very much appreciate those of you presenting  
2 respecting the time clock because it is  
3 respect for your fellow community members.  
4 And it gives us time for questions to get to  
5 specific topics that you can help us in our  
6 deliberations here.

7 With no further ado, Jackie  
8 Townsend, if you will make your way to the  
9 podium. And we have Isaura Andaluz on deck.

10 Jackie, thank you. Michelle, are  
11 you ready? Okay.

12 MS. TOWNSEND: Good morning. My  
13 name is Jackie Townsend. I am the MOSA  
14 Certification Review and Farm Certification  
15 Manager. MOSA certifies almost 1600 farmers  
16 and processors located, primarily, in the  
17 Midwest.

18 We are fortunate to be in Viroqua,  
19 in the heart of a thriving organic community.  
20 We are the largest livestock certifier in the  
21 nation.

22 First, I will comment on

1 methionine. When the proposal was first  
2 released, we sent a survey out to our  
3 certified chicken farmers and chicken feed  
4 manufacturers. The message we received was  
5 one of support. However, it also raised  
6 concerns for animal welfare with the current  
7 annotations in the rule and with broiler  
8 nutritional needs not being met.

9 For hens, nutritionists said that  
10 the methionine levels over the life of the  
11 bird would not exceed the proposed level  
12 generally anyway. So, we feel the record-  
13 keeping in this area could be made pretty  
14 practical under the proposal. Our written  
15 comments we submitted last fall expand on this  
16 further.

17 This is a nice segue into the next  
18 topic, which is research priorities.  
19 Methionine alternatives area clearly a need.  
20 So are antibiotics for fire blight and GMO  
21 vaccines. We would like to see some  
22 prioritization of livestock management topics.

1 We appreciate the work to move ahead on these  
2 topics and are available to help in any way we  
3 can.

4 On GMOs, it was great to see the  
5 NOP memo to the NOSB. Clearly, this is a  
6 research priority, too. Probably kick it to  
7 the top of the list. More information is  
8 needed on contamination avoidance. The 11/3  
9 policy memo was helpful but isn't addressing  
10 the current problem.

11 We see clients have their crops  
12 being tested in the marketplace, resulting in  
13 minorly positive results and organic crop  
14 rejection and sale of the crop on the  
15 conventional market.

16 Inspections that we do yield very  
17 low results, no evidence of GMO use. We  
18 recognize how difficult setting limits would  
19 be so it may be easier to provide further  
20 guidance on testing and sampling.

21 The seed purity report shows the  
22 importance of further work in this area. We

1 need to be sure our seeds are starting out  
2 GMO-free and we need time for research and  
3 development. We understand but do not agree  
4 with the complexities in overall GMO  
5 regulation. Onus should be on those polluting  
6 the system. Our country should have GMO  
7 labeling laws. We have even been approached  
8 about adding non-GMO verification but we have  
9 no time to consider that, due to our sound and  
10 sensible systems implementation. But it may  
11 be something to consider on down the road,  
12 depending on the outcome of this conversation.

13 Now that I mentioned it, I have to  
14 say something about sound and sensible.

15 First, thank you all for taking the subject up  
16 so quickly. We appreciate the direction we  
17 are headed for clients. We need to ensure  
18 practical and sound enforcement of the  
19 standards. We just maintain our certification  
20 system to withstand the test of time. We must  
21 find ways to communicate effectively  
22 throughout the industry. We have a strong

1     desire to see relationships and collaboration  
2     between ACAs, NOP, NOSB, and other  
3     stakeholders strengthen. Some NOP  
4     instructions have added requirements for us.  
5     Some will add cost to certification for  
6     clients. Some will impact organic  
7     availability of product in the marketplace.  
8     Some have caused creation of systems or  
9     entirely changing the system. Some have  
10    resulted in hiring staff or dedicating staff  
11    resources. Most require some added expense.

12                   Clarifications are generally well-  
13    received and we work to implement them but we  
14    need time to catch up and rest for a minute.  
15    It would be great to be proactive, rather than  
16    reactive. We ask that in developing  
17    recommendations and instructions that sounds  
18    and sensible principles be kept in line for  
19    certifiers. Finding further balance in this  
20    area continues to be an important discussion.

21                   We appreciate the work of the NOP  
22    and NOSB and thank you to Mac for reaching out

1 to certifiers and representing our industry.  
2 We are available for further questions and  
3 inquiry at any time.

4 CHAIR STONE: Thank you, Jackie.  
5 So, I know at the ACA training, the certifiers  
6 sort of went around the room of how they are  
7 implementing sound and sensible and  
8 communication with clients and electronic and  
9 updates was a big part of that. And we  
10 appreciate all you all are doing for the  
11 complicated multiple crop farmers. It is not  
12 easy at that point.

13 MS. TOWNSEND: Thank you.

14 CHAIR STONE: Thank you, Jackie.  
15 Oh, Francis. I'm sorry, Jackie.

16 MEMBER THICKE: Yes, a question  
17 for Jackie. I didn't fully understanding on  
18 the methionine. Are you saying that even with  
19 the proposed change in the methionine that  
20 that is not adequate?

21 MS. TOWNSEND: The reports that we  
22 heard, the proposed change for layers would be

1 entirely adequate, averaged out over the life  
2 of the bird but there was some concern raised  
3 by nutritionists we spoke to about broiler  
4 levels, about the levels not meeting the  
5 nutritional need for broilers. They need more  
6 methionine during their short lives is some of  
7 the reports we heard.

8 MEMBER THICKE: And what size  
9 houses are these, the ranging of sizes? Do  
10 you know?

11 MS. TOWNSEND: A variety. We  
12 certify any number -- many numbers of birds  
13 from a few hundred to less than a hundred to  
14 multiple thousands. So, those reports came  
15 primarily from the nutritionist working at  
16 feed manufacturers, as well as the growers  
17 growing the birds, a cross-section variety of  
18 people.

19 MEMBER THICKE: Thank you.

20 CHAIR STONE: All right, thanks,  
21 Jackie.

22 MS. TOWNSEND: Thank you.

1                   CHAIR STONE: Isaura to the podium  
2 and Pam Coleman on deck.

3                   MS. ANDALUZ: Good morning. My  
4 name is Isaura Andaluz and I am the Treasurer  
5 of OSGATA, the Organic Sea Growers and Trade  
6 Association, a national farmer organization  
7 representing certified organic farmers,  
8 growers, and seed companies. I am making  
9 these comments under protest.

10                   OSGATA, as an organization which  
11 exists to protect and steward the interests of  
12 the organic community, cannot condone, in good  
13 conscience, the statutory rights and  
14 responsibilities of the NOSB. The NOSB was  
15 established by Congress as an independent  
16 citizen oversight board under the authority of  
17 the Organic Foods Protection Act of 1990.  
18 OFPA represents a negotiated framework by  
19 which the organic community entered into  
20 partnership with the USDA in accepting  
21 regulation of the organic industry.

22                   OSGATA's role in helping steer the

1 functioning of the organic industry requires  
2 those to insist that the letter and the spirit  
3 of the neighboring legislation be respected.  
4 It is essential if the NOP is to maintain the  
5 participation of certified organic farmers and  
6 businesses, and most importantly, to maintain  
7 the trust and confidence of the organic  
8 consumer.

9           And these are comments regarding  
10 the CPAT from GMO. We thank the NOSB for  
11 having the courage to recognize the GE  
12 movement outside of the areas that they have  
13 grown in is a source of pollution and the GE  
14 presence is a contaminant to organic seed.  
15 Organic begins with seed.

16           OSGATA's policy on genetic  
17 engineering states that the contamination of  
18 organic seed by GE seed constitutes a  
19 repairable harm to the organic seed industry.  
20 By undermining the integrity of the organic  
21 seed, any detectible level is unacceptable.

22           Farmers are the stewards to these

1 seeds. As such, we must acknowledge that the  
2 increasing rate of GE contamination poses  
3 threats to our carefully curated genetics.  
4 This externalize cost to contamination is  
5 irreplaceable.

6           The presence of GE traits in seed  
7 has severe consequences for farmers. One such  
8 consequence is the associated cost shouldered  
9 by organic farmers as the result of  
10 maintaining seed purity. OSGATA used seed  
11 testing to identify GE contamination as  
12 necessary to maintain the organic seed  
13 integrity. Required seed testing and seed  
14 purity protocols applied to organic seed must  
15 also be applied to conventional seed as done  
16 a thousand years by organic farmers.

17           Organic farmers should not bear  
18 the economic burden associated with the cost  
19 of contamination, including testing, nor  
20 should they assume the cost associated with  
21 crop loss from the GE contamination and  
22 whatever drops on their side of the fence.

1 The biotechnology of patent holders must bear  
2 all costs associated with the polluting  
3 technology.

4 OSGATA disagrees with NOSB's  
5 conclusion that holding patent holders  
6 financially accountable for the cost of  
7 contamination is outside the scope of the NOP  
8 and USDA. USDA and APHIS must require that  
9 the associated costs of contamination be borne  
10 by biotech patent holders.

11 As we move forward with  
12 implementation of seed purity standards, it is  
13 imperative that the NOSB continues to work  
14 with stakeholders within the organic seed  
15 community.

16 And PCO has got a handbook that I  
17 passed out to everyone that we have developed  
18 for additional research for testing protocols  
19 on GE contamination. Thank you for your time.

20 CHAIR STONE: Thank you, very  
21 much.

22 Zea?

1 MEMBER SONNABEND: Now is it on?

2 Okay. Thank you for your comments Isaura.

3 What would you suggest further we  
4 could do to get the polluter to pay for  
5 contamination and for the testing?

6 MS. TOWNSEND: Well, I mean the  
7 problem is that you know, because I sit on the  
8 AC21 Committee, that they came out with like  
9 crop insurance. So, the problem is that these  
10 biotech companies can circumvent basically any  
11 compensation mechanism that you come up with.

12 So now for example, Monsanto  
13 bought up a company in October that offers  
14 crop insurance. So now, the polluter is going  
15 to be selling the insurance to the people that  
16 they are contaminating. Right?

17 So, I mean the problem is that  
18 they patent a life form. I mean, it doesn't  
19 matter. The seeds do what they are supposed  
20 to be doing. They cross-pollinate. Because  
21 the seeds are evolving. That is how come we  
22 are all here because the seeds have evolved

1 with the climate change over all these  
2 hundreds or thousands of years and the seeds  
3 keep evolving by cross-pollinating.

4 So I mean the thing is, like I  
5 said before, this is just my thing. It is not  
6 OSGATA. They can breed in sterility into some  
7 of these seeds like they do on a lot of the  
8 hybrids. It is not the terminator genes. It  
9 is not anything else. It is just -- you know  
10 they have been doing this for a long time but  
11 they don't want to incur that cost.

12 And if it is a seed that they  
13 can't do that to, then maybe that seed should  
14 just not be out there on the market.

15 But I mean we are seeing  
16 increasing numbers of farmers being  
17 contaminated. You can do all the data  
18 collection you want but the farmers are not  
19 going to tell you what they had because they  
20 have infringed on the patent law of the patent  
21 holder.

22 So, it is very difficult to gather

1 this information. And that is why it is when  
2 the USDA says we need to get more information.  
3 Then you gather information. No. Something  
4 needs to be done now and maybe USDA needs to  
5 go back and they need to look at all the  
6 patent laws that they passed. I mean, this is  
7 the existing -- they are going to make us  
8 extinct. I mean, there are some seeds already  
9 that we know as seed breeders. There is only  
10 a minimal amount of seed left that is not  
11 contaminated. And I think a lot of the other  
12 companies, what they already have been doing,  
13 this is like back since 10 or 20 years ago is  
14 they have been growing seed in other  
15 countries. And that might be what will happen  
16 to us is that all of us will have to grow all  
17 of our seeds in other countries and bring the  
18 seed back here to the United States, where you  
19 have basically exported all of those jobs out  
20 of the United States.

21 And we already see on the local  
22 level that a lot of the seed companies we have

1 in all of our states are gone. They have been  
2 gone.

3 And now with alfalfa, the  
4 perennial crop, it is even worse.

5 CHAIR STONE: Thank you very much.  
6 Oh, Nick. Isaura, I'm sorry. One more.

7 MEMBER MARAVELL: Sir, I would  
8 like to turn the table a little bit here and  
9 just ask you what is your best estimation of  
10 the future work or mission of the AC 21  
11 Committee. Being a member of that committee,  
12 have you received any indication of the future  
13 direction of that committee or the mission of  
14 that committee's charge now?

15 MS. TOWNSEND: No, we have not.  
16 We have just been waiting for the funding to  
17 continue the work of the AC 21. There is no  
18 -- nothing is set is yet.

19 CHAIR STONE: Thank you, very  
20 much.

21 Pam Coleman to the podium and  
22 Laura Cardona on deck.

1 DR. COLEMAN: Good morning. My  
2 name is Pamela Coleman. I am a policy analyst  
3 for the Cornucopia Institute. I have a Ph.D.  
4 in plant pathology and experience as an  
5 organic inspector. Today, I will discuss the  
6 use of streptomycin to control fire blight in  
7 apples and pears.

8 Three years' ago, the Crops  
9 Subcommittee recommended against the relisting  
10 of streptomycin. The full Board compromised.  
11 They voted to relist but only until 2014.  
12 Now, it is 2014. This week, I urge you to  
13 respect the work of the NOSB in the past and  
14 oppose this petition for extension of  
15 streptomycin.

16 Streptomycin is not essential.  
17 Other options are available. Moreover, its  
18 effectiveness has been reduced in many  
19 orchards because the bacteria that control  
20 fire blight have developed resistance due to  
21 repeated applications of streptomycin.

22 My review of the research has

1 convinced me that fire blight can be managed  
2 without the use of antibiotics. Canadians,  
3 Europeans, Japanese, all of them are growing  
4 apples without antibiotics. Why aren't we  
5 doing that?

6 Well, actually, we are doing that.  
7 Many apple growers in Washington State avoid  
8 the use of antibiotics, so that they can sell  
9 their organic apples in Europe. They grow  
10 popular and even highly susceptible varieties:  
11 Gala, Fuji, Braeburn, Pink Lady, Honey Crisp,  
12 all without the use of antibiotics.

13 Cornucopia surveyed apple growers  
14 all over the U.S. and of those who responded,  
15 more than half of them said they don't use  
16 antibiotics. Success depends on an integrated  
17 approach. Orchardists must be proactive.  
18 They must monitor the orchard and take action  
19 to prevent disease outbreaks early in the  
20 season. This is what the organic approach is  
21 all about. It is different from the  
22 conventional approach of waiting until disease

1 is present and then spraying antibiotics.

2 There are many options, as well as  
3 antibiotics. There are cultural practices,  
4 resistant root stalks, blossom thinning,  
5 material such as copper sulfate, lime sulfur,  
6 fish oils.

7 I am especially excited about the  
8 new biological controls that are showing  
9 excellent results. Dr. Ken Johnson talked  
10 about those and it has been widely -- the  
11 information has been widely disseminated  
12 through eOrganic. The biological controls  
13 were as effective as antibiotics, even on  
14 susceptible apples. Comments for this meeting  
15 submitted by Westbridge, who manufactures the  
16 biological control Blossom Protect, also  
17 showed more research that that product is as  
18 effective as antibiotics, even on pears which  
19 are susceptible and highly susceptible apples.

20 Please reject this petition.  
21 American orchardists are fully capable of  
22 using an integrated approach to manage fire

1 blight. Those of you sitting here can end the  
2 use of antibiotics and protect the organic  
3 brand. If you reject this petition today,  
4 next year, when you go out to buy your organic  
5 apple juice that say 100 percent USA apples,  
6 these apples will have been grown without  
7 antibiotics. Won't that be a good feeling?

8 I am happy to answer questions.

9 CHAIR STONE: Thank you, Pamela.

10 Harold?

11 MEMBER AUSTIN: Good morning, Pam.

12 In the research and stuff that you were able  
13 to go through and take a look at, what did you  
14 find different as far as fire blight's  
15 acceptability to control measures with pears?  
16 Because in your written -- Cornucopia's  
17 written statements, they did suggest that  
18 there might possible need to be consideration  
19 for pear growers because the research -- the  
20 level of research hasn't taken place and the  
21 effectiveness of the materials isn't quite  
22 there yet.

1                   What have you found?

2                   DR. COLEMAN: I have found that  
3 the materials are effective. However, you are  
4 right, there has been fewer experiments on  
5 pears, partly because there is fewer pears  
6 grown. And you are correct, pears are  
7 naturally more susceptible.

8                   If it is possible to differentiate  
9 between apples and pears in your approval of  
10 this petition, then that might be a reasonable  
11 compromise to say extend the use for pears.

12                  There is a couple of reasons why I  
13 think it would be organically acceptable to  
14 allow antibiotics on pears but not apples. We  
15 talk a lot about the organic approach. And  
16 the organic approach is to use a multi-level  
17 way to prevent diseases. So, you start with  
18 cultural practices. And from what I have seen  
19 in Washington State, the pear growers are  
20 using cultural practices. Their pruning  
21 practices are such that they have many  
22 branches to the tree, so that the tree doesn't

1 die if it gets fire blight. Also, they have  
2 older trees and older trees are less  
3 susceptible to fire blight. And they do not  
4 use the dwarfing rootstocks.

5 One of the reasons that fire  
6 blight has become so serious in Washington  
7 State is because more and more apple growers  
8 are planting trees on the highly dwarfing  
9 rootstocks that are more susceptible and have  
10 the smaller trees.

11 So, my concern here is that I am  
12 seeing that apple growers are relying first on  
13 antibiotics and not using the cultural  
14 controls but the pear growers I am seeing are  
15 using the cultural controls. And if they are  
16 not efficient, if they are not enough, then  
17 you can use materials. And I think that is  
18 consistent with an organic approach.

19 CHAIR STONE: Jay?

20 MEMBER FELDMAN: Thanks, Pam. I  
21 am interested in your comment on the age of  
22 the trees and the resistance to the fire

1 blight as a result of the -- we had the  
2 opportunity as a Board to visit the Mount Hood  
3 area in Oregon and saw a number of sites,  
4 which included an older orchard of pears --  
5 pear trees, which seemed to be, well at least  
6 according to the grower, the fire blight did  
7 not seem to be pressure there in that  
8 particular orchard.

9           So, I guess you raise a complexity  
10 here that I am wondering about because you  
11 suggested this might be a compromise. If in  
12 fact there are specific conditions under which  
13 the streptomycin, in this case, would not be  
14 necessary in pear production and if in fact  
15 the problem is associated with younger trees,  
16 would you suggest that in a compromise such as  
17 this that there be a delineation made between  
18 the type or orchard or the age of the orchard,  
19 the age of the tree, given the essentiality  
20 under those conditions?

21           I am just trying to understand,  
22 especially when you raise the idea of

1       compromise, whether the complexity of what you  
2       are suggesting goes beyond the compromise  
3       between apples and pears but really strikes at  
4       some of the conditions, even within the  
5       growing of pears that might differentiate the  
6       essentiality or the need for streptomycin in  
7       different age orchards, maybe different  
8       varieties, maybe different rootstocks.

9                        I mean you focused on apples but  
10       what about pears and the differentiation  
11       there?

12                      DR. COLEMAN:   Okay, I just want to  
13       clarify when you talk about age, are you  
14       suggesting this only for pears?   Because I  
15       really do believe -- is this still on?   I  
16       can't tell if you can hear me.   Can you hear  
17       me?   Thank you, Michelle.   Michelle hears me  
18       very well.

19                      I am not sure if you are asking  
20       just about the complexity for pears or apples  
21       as well.

22                      MEMBER FELDMAN:   Pears.

1 DR. COLEMAN: Okay. Because I  
2 think if you start allowing it for young  
3 apples, then you get too complicated for the  
4 certifiers.

5 I want to just keep stressing that  
6 it is a complex issue. So, there are so many  
7 factors that combine. Age of the trees is one  
8 of them; rootstocks is one of them; the way  
9 that pear trees and apple trees flower all at  
10 once or dragged out over a long time.

11 So, I am not sure how to answer  
12 your question. Are you thinking that possibly  
13 you could say that antibiotics would be  
14 allowed on young pear trees?

15 MEMBER FELDMAN: Yes, I was just  
16 trying to understand whether there is another  
17 level of complexity that the compromise that  
18 might be discussed would not simply be a  
19 compromise between apples and pears. You  
20 know, sort of cutting the -- splitting the  
21 issue here that way. But that even within  
22 pears, at least from what I was able to

1 observe, there is a level of complexity, given  
2 cultural practices, age of the orchard. These  
3 are all issues that come down to questions of  
4 essentiality. And I think, especially with  
5 the sensitivity that we see out in the public  
6 to the use of antibiotics and food production,  
7 given the resistance we are seeing in human  
8 populations and the need for antibiotics, that  
9 we have to be really careful when we talk  
10 about compromise, that we drill down to the  
11 really specific levels of essentiality. I  
12 mean this is not a broad brush issue. This  
13 has to be a very specific issue.

14           So, that was my question, whether  
15 we could create those lines that I believe I  
16 observed. I mean, unless somebody has a  
17 response to that. I mean we did see an older,  
18 very old, actually, orchard that did not have  
19 the fire blight issue. Now, that could have  
20 been also the geoclimate there, whatever, the  
21 microclimate that existed in that particular  
22 -- I mean there are a lot of factors.

1 DR. COLEMAN: Right. There are a  
2 lot of factors. And I would hate to have a  
3 compromise within pears because it would be  
4 very confusing to have some treated with  
5 antibiotics and others not treated with  
6 antibiotics, I believe. But I think you bring  
7 a good point up with consumers because I bring  
8 this apple juice in because I do think  
9 consumers are particularly concerned about  
10 apples because it is something that is so  
11 commonly drunk, it is so commonly added to so  
12 many fruit juices and given to children that  
13 I am just extremely concerned that if word  
14 gets out that this juice that we are giving  
15 our children is grown with apples treated with  
16 antibiotics. I think that can do a lot of  
17 harm to the organic apple growers and I would  
18 not like to see that happen.

19 CHAIR STONE: Thank you, Pamela.

20 Okay, Laura to the podium and Bill  
21 Wolf on deck.

22 MS. CARDONA: Hello. My name is

1 Laura Cardona. I am a member of the  
2 Cornucopia Institute and here today as a  
3 citizen lobbyist.

4 I am actually an autism mom who  
5 became extremely interested in organics with  
6 my daughter who was failure to thrive for one  
7 year, did not gain weight for one year. When  
8 I switched her to an organic whole foods diet  
9 is when she started to gain weight, after many  
10 medical interventions.

11 I volunteered to present testimony  
12 because I am concerned about the use of  
13 antibiotics on organic apples, as Pamela was  
14 talking about. I was happy to learn that the  
15 full Board voted to allow tetracycline to be  
16 phased out in 2014 and streptomycin should be  
17 phased out as well.

18 Consumers who buy organic food  
19 want to know that they are avoiding  
20 antibiotics and more than 83,000 consumers  
21 signed a petition or commented directly to say  
22 that they do not want antibiotics in organic

1 fruit.

2 I am particularly concerned about  
3 the threat of antibiotic resistance from the  
4 use of streptomycin. Some bacteria, those  
5 that cause the fire blight, disease in apples  
6 and pears, have already developed resistance  
7 to streptomycin, making it less effective in  
8 that plant disease.

9 We need to ensure that  
10 streptomycin remains effective in controlling  
11 human disease. The World Health Organization  
12 stated that it is critical to prevent  
13 resistance to streptomycin. People who have  
14 resistant bacteria in their intestinal flora  
15 may not realize it until they have an  
16 infection that does not respond to antibiotics  
17 and even low doses of streptomycin can  
18 increase the likelihood of resistant  
19 populations.

20 Farm workers are exposed when they  
21 spray the trees and consumers can obviously be  
22 exposed when they eat the fruit. Residues of

1 streptomycin have been found on the apples  
2 themselves when the trees were sprayed 86 days  
3 before harvest.

4 So, you can rationalize that these  
5 are low levels but that is the problem.

6 Exposure to the low levels of antibiotics  
7 contributes to the development of antibiotic  
8 resistant bacteria.

9 Another example is sheep that were  
10 grazed in fields, sprayed with streptomycin,  
11 were found to have higher levels of the  
12 streptomycin-resistant bacteria. So, I am  
13 asking you today to not wait until we see  
14 antibiotic resistance in humans. Please allow  
15 the use of streptomycin to expire at the end  
16 of 2014, as the rules are currently written.

17 On a personal note, I said I am an  
18 autism mom and the research shows that 50  
19 percent of autistics have GI symptoms, food  
20 allergies, and malabsorption issues. For us  
21 in our family, healing the gut was so  
22 important and crucial to my daughter's

1 recovery. So, when antibiotics are allowed in  
2 organics, it undermines our efforts to heal  
3 the gut. And, as you know, antibiotics kill  
4 good gut flora.

5 For allergy moms, we need peace of  
6 mind knowing that our organic food is as pure  
7 as possible.

8 So, if you have more questions  
9 about streptomycin, I encourage you to speak  
10 again with Pamela Coleman and/or you can  
11 actually call her back up now. But thank you  
12 so much to keeping our organics strong. I  
13 really appreciate the work you are doing. And  
14 thank you for allowing me to present today.

15 CHAIR STONE: Thank you very much.

16 MEMBER FELDMAN: Mac?

17 CHAIR STONE: Bill Wolf to the  
18 podium.

19 MEMBER FELDMAN: Mac.

20 CHAIR STONE: She said direct  
21 questions elsewhere.

22 MEMBER FELDMAN: Well, this isn't

1 related to streptomycin.

2 CHAIR STONE: And Bill Wolf to the  
3 podium and Brian Keegan on deck.

4 MR. WOLF: Good morning. I am  
5 Bill Wolf, President of Wolf DiMatteo and  
6 Associates, a consulting and technical support  
7 firm for organic production, farming,  
8 certification, and policy and regulatory  
9 issues.

10 It has been several years since I  
11 have had the opportunity to address the NOSB  
12 and so some of you may not know me. Some of  
13 you may recall my earthworm slide shows. I  
14 don't have one today. I have been involved in  
15 organics for over 40 years.

16 Today, I am actually here  
17 representing a client, Draco Natural Products  
18 of San Jose, California, the petitioner to  
19 remove glycerin from the National List. I  
20 would like to share a statement from them.  
21 They were unable to attend.

22 Draco Natural Products appreciates

1 the opportunity to comment and really thanks  
2 the Handling Committee for supporting our  
3 petition to remove glycerin from Section  
4 205.605(b) of the National List. Ideally,  
5 this is the decision we seek.

6 Public comments submitted prior in  
7 this meeting and in October of last year are  
8 clearly divided between support for removal  
9 and concern about the commercial availability  
10 of organic glycerin to meet the quantity and  
11 quality demands of organic food manufacturers.

12 Concern about the impact on  
13 natural flavors and colors which are used  
14 broadly in organic products has also been  
15 raised. Our key points in response are,  
16 number one, through increased demand between  
17 2012 and 2013, Draco's production increased  
18 120 percent and continues to grow. There are  
19 other manufacturers of organic glycerin and  
20 current supplies that now sit in warehouses  
21 waiting to be sold. However, we realize that  
22 confidence in the supply chain is necessary.

1 If the NOSB is not totally in support of  
2 removal, we are willing to support a decision  
3 to list glycerin in Section 205.605, ensuring  
4 that it be used in organic products, unless  
5 commercially unavailable.

6 Point two, further, if the NOSB  
7 believes that some synthetic glycerin needs to  
8 be used, we would reluctantly accept the  
9 retention of synthetic glycerin on 605(b)  
10 because of the problems with classifications  
11 of materials but only if restricted to use in  
12 made with organic products and as carriers in  
13 natural flavors and organic colors.

14 We don't support 605 solution  
15 suggested by OTA because it would still allow  
16 synthetic glycerin to be used in any organic  
17 product.

18 Please do not postpone this  
19 decision. It take many months, if not years,  
20 for your decision to be fully enforced by NOP.  
21 Your decision now gives manufacturers and  
22 ingredient suppliers a transition time they

1 may need, as well as sends a message about the  
2 commitment to continuous improvement.

3 In addition, we urge the NOP to  
4 complete its work on the classification  
5 materials guidance document in order to avoid  
6 further confusion and complexity in decisions  
7 on petitions and approval of materials used in  
8 organic production.

9 Draco has invested in producing  
10 organic glycerin because it will increase the  
11 amount of organic ingredients in final  
12 products, as consumers increasingly demand,  
13 and to support organic farmers who produce the  
14 raw ingredients Draco uses. Replacing  
15 synthetic glycerin with organic glycerin in  
16 organic processed products is the right thing  
17 to do, in accordance with the principles of  
18 organic production.

19 That ends Draco's statement. Of  
20 course, Wolf DiMatteo and Associates also  
21 submitted comments on a range of other topics.  
22 I am open to answering questions about Draco's

1 and the glycerin issue and any other questions  
2 on any matter. Thank you.

3 CHAIR STONE: Thank you, Bill.

4 Jay, any questions?

5 MEMBER FELDMAN: Hello? Okay,  
6 thank you. Thank you, Bill. I loved your  
7 statement. This is exactly what I think the  
8 organic community is about, bringing new  
9 ideas, incentivizing organic materials,  
10 natural-based materials, whatever.

11 So, you came here with some  
12 compromises to a petition. Do you not feel  
13 that the company, I guess Draco has the  
14 capacity to meet the need, current glycerin  
15 needs as petitioned in the organic form that  
16 it is now producing. And if -- the way I read  
17 the petition, the petitioner felt pretty  
18 strongly that -- and we have seen this with  
19 other alternatives where, until the demand is  
20 really there, it is hard to argue that the  
21 supply is there, once the demand is  
22 incentivized through this petition.

1           The question is, will the demand  
2           be able to -- will the supply be able to meet  
3           the demand? And if so, why would you want to  
4           compromise on the petition?

5           MR. WOLF: Well, there are several  
6           producers of organic glycerin. Draco is only  
7           one of those producers. Draco produces using  
8           fermentation methods. There are two basic  
9           certified organic procedures for producing  
10          glycerin. Fermentation is one of them.  
11          Saponification is the second.

12           And if in fact the surveys and the  
13          data about the volume of glycerin being used  
14          in organic products today is accurate, if  
15          today the switch was turned, then there would  
16          be a short. However, there is quite a long  
17          period of time from when this Board votes to  
18          when the actual rule is completed and changes.  
19          And so, I would leave it to the Board to judge  
20          the chain of events that is going to occur.  
21          But we were also supportive of, and helped to  
22          prepare the petition for organic lecithin

1 changes on the National List. And there are  
2 some similarities in terms of the process and  
3 the amount of time it takes to build supply.  
4 And there has not been a shortage or organic  
5 lecithin in the marketplace that caused any  
6 hardships.

7           The difference in this situation  
8 is that there is a technical difference  
9 between the lecithin situation and the  
10 glycerin situation. And that is that glycerin  
11 is a very common ingredient in natural  
12 flavors. Natural flavors is on the National  
13 List and is used very commonly in processed  
14 organic foods. And not all natural flavor  
15 producers are making organic or products  
16 specifically for the organic market.

17           So, we have a little bit of a  
18 complication there in the annotations that  
19 have been added to natural flavors on 605.  
20 And Draco is sensitive to that and wants the  
21 organic industry not to be upset or disrupted.

22           I think the problem could be

1 solved by simply using organic glycerin but I  
2 also know that that adds a layer of challenges  
3 throughout the supply chain. So, what Draco  
4 has taken the position of is that they don't  
5 want to disrupt many, many companies and  
6 processes. As I said, there are several  
7 producers of organic glycerin, all available  
8 to ramp up their production during the period  
9 from when this Board votes to when it is fully  
10 implemented on the National List.

11 MEMBER FELDMAN: Thank you.

12 CHAIR STONE: Thank you, Bill.

13 Harold?

14 MEMBER AUSTIN: Bill, during the  
15 public comments that we received back, there  
16 was also one other, along with the concerns  
17 that you have just stated and why you have  
18 come with a potential compromise, was also a  
19 couple of comments regarding the ability of  
20 some of those that are using glycerin to be  
21 able to continue with their food safety  
22 certifications. They have raised some issues

1 that possibly they might not be able to do  
2 that with the organic sources. Could you talk  
3 to us a little bit about that?

4 MR. WOLF: It is interesting to  
5 raise that question. I am not convinced that  
6 that is a question within the framework of the  
7 Organic Foods Production Act, frankly. I  
8 think it is an important issue, generally, for  
9 the organic community to be compliant to all  
10 food safety regulations.

11 In the case of Draco, they are  
12 certified by SGS, an internationally known  
13 inspection agency to both their HASA plans and  
14 GMP plans. They also hold Kosher  
15 certifications, as well as USDA organic and EU  
16 organic certifications.

17 I can't speak to other producers  
18 but there are -- the complexities of food  
19 safety inspections have become much more  
20 challenging because many -- some of the larger  
21 food handling proceeding companies require  
22 that their own inspectors do additional

1 inspections. And not every company allows  
2 that.

3 So, I am not privy to the ins and  
4 outs of this issue but I gather it did come up  
5 in some surveys about glycerin. But I am not  
6 convinced that that really has anything to do  
7 with the issue.

8 MEMBER AUSTIN: Thank you. And I  
9 think it just -- my point being is when we  
10 look at the ability of the organic community  
11 and the handlers to be able to make that  
12 transition, if we were to move forward with  
13 this, that would be one of the things that  
14 would be impacting them as well.

15 So, looking at our organic  
16 stakeholders and the impacts that any decision  
17 that we would have here, how that would affect  
18 those stakeholders.

19 MR. WOLF: Well, this comes back  
20 to a comment that Wolf DiMatteo and Associates  
21 has been making every year or so for the last  
22 ten years and that is that commercial

1 availability should apply to the entire list.  
2 If it did, then the issue of commercial  
3 availability would address a food safety  
4 glitch, meaning that if you couldn't get your  
5 product to meet your specifications and they  
6 were legitimate specifications, you could  
7 submit to the certifier information to show  
8 that it wasn't compliant to a food safety  
9 issue. And that does occur today in the  
10 marketplace. However, currently, commercial  
11 availability is not being applied to any other  
12 section of the list except 606. In terms of  
13 continuous improvement, that would be a major  
14 step forward, if in fact the entire list did  
15 have commercial availability applied to it.  
16 And that would solve the food safety question.

17 CHAIR STONE: Than you Bill.

18 MEMBER FELDMAN: Can I just ask,  
19 is there any -- do you see any legal  
20 impediment to doing that or is it just -- why  
21 hasn't that done been done, that follow  
22 through on your recommendation?

1                   MR. WOLF: We have made that  
2                   statement in the past but there is no real  
3                   movement to change that. I don't know how we  
4                   would do it. There is not a formal petition  
5                   process for doing that. That is a framework  
6                   rule change.

7                   MEMBER FELDMAN: Okay, thank you.

8                   CHAIR STONE: Thank you, Bill.  
9                   Thank you, very much. Anything else? Brian  
10                  Keegan to the podium, Lindsey Fernandez-  
11                  Salvador on deck.

12                  Board members, I will let you know  
13                  we are sufficiently doubled our time. We are  
14                  going way over. I am considering that we go  
15                  straight through. We may not take a break.  
16                  Each of us can get up as we need to, pick the  
17                  speakers, just to try to make up some time.

18                  I am hesitant to not allow  
19                  questions but we are running way over. So,  
20                  thank you.

21                  Brian?

22                  MR. KEEGAN: Good morning. I am

1 Brian Keegan. I am a consumer, a grandfather,  
2 member of the Cornucopia Institute. And I am  
3 here today as a citizen lobbyist.

4 I volunteered to help present  
5 testimony because I am concerned about the  
6 recent efforts of the NOP to take away the  
7 independence and the rightful authority of the  
8 National Organic Standards Board. There are  
9 many examples of this takeover but I only have  
10 four minutes. So, today I will talk about the  
11 new NOP Sunset process. This issue is not on  
12 the agenda but it should be.

13 The NOP reversed the Sunset  
14 procedure without public involvement and  
15 without the consent of the NOSB. In the words  
16 of Congressman Patrick Leahy and Peter DeFazio  
17 in a letter to Agriculture Secretary Tom  
18 Vilsack, we are urging you to reverse this  
19 policy change. The OFPA is one of our  
20 proudest legislative accomplishments and we  
21 are extremely concerned by this significant  
22 and unwarranted policy change.

1                   Many organizations have written  
2 eloquent comments in support of the Board's  
3 right to determine the Sunset policy. For  
4 example, Beyond Pesticides, Center for Food  
5 Safety, Consumers Union, Cornucopia Institute  
6 for food and water watch, Midwest Pesticide  
7 Action Center, National Organic Coalition, No  
8 Spray Zone, NOFA Interstate Council, Wild Farm  
9 Alliance.

10                   Three former of the NOSB, Jim  
11 Riddle, Jeff Moyer, and Barry Flamm wrote to  
12 Secretary Vilsack to express their objections  
13 to reversal of the Sunset policy. They also  
14 mentioned additional concerns.

15                   We are distressed by the apparent  
16 determination of the NOP management that they  
17 have the authority to micromanage the NOSB  
18 work plans and agendas. The disbanding of the  
19 NOSB's policy development subcommittee was  
20 again done in an arbitrary, unilateral, and  
21 disrespectful manner by the management of the  
22 NOP with no public discussion or consultation.

1                   Thank you to NOSB members for your  
2 work in keeping organics strong. I wish you  
3 success in your efforts to develop work plans  
4 that address vital issues, to have a policy  
5 subcommittee that responds to public input and  
6 to have a robust Sunset process.

7                   Now, for my two cents in this, if  
8 I may. A long, long time ago in a faraway  
9 land, I worked and trusted in people that  
10 governed -- that were involved in governing  
11 America. Then, I was introduced to Agent  
12 Orange. Life has never been the same.

13                   Since then, I have watched as the  
14 global oligarchs have become more visible and  
15 active. And over time, I felt we have lost  
16 our honor. And without our honor, all is  
17 lost.

18                   I have seen the likes of Monsanto  
19 and its affiliates spread their tentacles of  
20 devastation around the planet with assistance  
21 by some in the global governments and private  
22 sectors. I am witnessing fascism and

1 plutocracy.

2 I hope that while you folks are  
3 sitting in these chairs for just a brief  
4 moment in history, that you will try to help  
5 bring back our honor. Do the right thing.

6 I wish you all a productive  
7 session while you are in San Antonio, good  
8 health to you and good health to your  
9 grandbabies.

10 That's all I have.

11 CHAIR STONE: Thank you very much,  
12 Brian. Thank you for taking the time to be  
13 here.

14 (Applause.)

15 CHAIR STONE: Lindsay Fernandez-  
16 Salvador to the podium and Gwendolyn Wyard on  
17 deck.

18 MS. FERNANDEZ-SALVADOR: Good  
19 morning, everybody. Mac, I am here to help  
20 catch you up on your schedule here. Okay?  
21 Because I am going to be real quick.

22 My name is Lindsay Fernandez-

1 Salvador. I work at OMRI. I am the technical  
2 director over there. I would like to start  
3 this morning by thanking the NOP and the NOSB  
4 for their service. And I think you guys are  
5 going a great job. I am going to talk about  
6 the vinasse and laminarin.

7 First for vinasse, OMRI supports  
8 the majority opinion. It is OMRI's opinion  
9 that vinasse is non-synthetic the way it is  
10 manufactured. We have approximately eight  
11 products on our list that contain vinasse. We  
12 also have other vinasse ingredients that we  
13 have prohibited because they contain synthetic  
14 additives that are not on the National List  
15 for that purpose.

16 We consider it non-synthetic  
17 because it is a substance created by quote  
18 unquote naturally-occurring biological  
19 processes. However, different sources of  
20 vinasse may contain synthetic additives that  
21 are otherwise not permitted on the National  
22 List and are not removed by the manufacturing

1 process.

2 We definitely agree with the  
3 suggested annotation to screen for high  
4 nitrogen fortification. This is one of the  
5 ingredients that OMRI regularly considers for  
6 analysis on nitrogen because it can be at risk  
7 for nitrogen fortification, just due to the  
8 wide variety of sources all over the globe.

9 For laminarin, OMRI's opinion is  
10 that raw laminarin, as described in the  
11 petition is non-synthetic. However, the  
12 attitude is need further review. For example,  
13 the leftover sodium sulfite produced during  
14 the pH adjustment is synthetic and should be  
15 evaluated as an inert, since laminarin is  
16 being petitioned as a pesticide.

17 We do note that the majority  
18 opinion says that sodium sulfite is present at  
19 insignificant levels. I do want to note that  
20 this will be the first time that the NOSB will  
21 suggest such a thing, since the new guidance  
22 document on classification of materials. And

1 while we don't have an opinion on whether that  
2 is significant or insignificant, we can say  
3 that currently OMRI would consider the sodium  
4 sulfate as part of the review and not ignore  
5 it or not review it.

6 So, please do realize that a  
7 precedent for quote unquote insignificant  
8 residues is being set with a majority opinion  
9 as written and to consider those part of your  
10 deliberation. Thank you.

11 CHAIR STONE: Thank you very much,  
12 Lindsay.

13 Jay.

14 MEMBER FELDMAN: Thank you,  
15 Lindsay. A couple questions. I am trying to  
16 understand. You said in your comments, I  
17 believe, that this would be the first time  
18 plant extract would not be identified as  
19 synthetic or that there other similar plant  
20 extracts that are subject to the same  
21 processing that are listed as synthetic. I am  
22 talking about laminarin now.

1 MS. FERNANDEZ-SALVADOR: No, we  
2 are talking about aquatic plant extracts that  
3 are typically extracted with alkaline  
4 materials that are used as plant soil  
5 amendments. And OMRI doesn't actually  
6 consider the extract itself to be synthetic.  
7 We consider the fact that the aquatic plant  
8 extract plus the extractant, the phosphoric  
9 acid or I'm sorry the alkaline materials are  
10 both present in the final product, as applied  
11 to the soil. And so that is why those aquatic  
12 plant extracts need to be on the National List  
13 or are on the National List because the  
14 synthetic, the alkaline material is still  
15 present.

16 MEMBER FELDMAN: Right. So, you  
17 don't see an analogy here with the synthetic  
18 material being present at a functional  
19 technical effect and, therefore, should be --  
20 I'm not saying it shouldn't be listed. I'm  
21 saying it should be evaluated as a synthetic.

22 MS. FERNANDEZ-SALVADOR: I see

1 your analogy but I think for clarity purposes,  
2 it is better to consider the extract and the  
3 separate ingredients as separate pieces of a  
4 puzzle.

5 MEMBER FELDMAN: And one last  
6 comment. Sorry. As you know -- I didn't mean  
7 to cut you off. I apologize.

8 MS. FERNANDEZ-SALVADOR: Oh,  
9 that's fine, Jay. You're on the Board.

10 MEMBER FELDMAN: I am just trying  
11 to move this along. I know Mac gets upset  
12 with me.

13 This idea of being treated as an  
14 inert, my antenna go up really high because we  
15 are not evaluating inerts and EPA no longer  
16 has list 1, 2, 3, 4, 4(a), 4(b), even though  
17 they rely on the NOSB or the NOP to reference  
18 those lists that no longer exist and has been  
19 very patient with this program in waiting for  
20 the analysis to be done. This is another  
21 topic for another day.

22 But to reference inerts, at this

1 point, as a way of allowing an admittedly  
2 synthetic ingredient to add a functional and  
3 technical effect in the final material, don't  
4 you think creates a little bit of a distance  
5 here with our inability to evaluate inerts  
6 and, in addition, having held up numerous  
7 other alerts, waiting for an inerts policy  
8 like EDDS as a substitute for EDTA.

9 So, why would it be proper, at  
10 this point, for the Board to dismiss or allow  
11 this materials inert and, therefore,  
12 circumvent review of a synthetic when, in  
13 fact, we have held up other inerts that are  
14 EDDS in the same exact category. It is a list  
15 for inert and we have held it up, pending an  
16 inerts policy.

17 So, is there a little bit of a  
18 dissonance or discordant position there do you  
19 think or am I off base on that?

20 MS. FERNANDEZ-SALVADOR: Actually,  
21 I think the logical progression is to continue  
22 reviewing materials with the rule that we have

1 right now and then to go back into a final  
2 sweep when we have made final rule on inerts,  
3 in my opinion.

4 CHAIR STONE: Zea?

5 MEMBER SONNABEND: Thank you,  
6 Lindsay.

7 I would just like you to briefly  
8 comment on your written comment on sodium  
9 carbonate peroxyhydrate and what is wrong with  
10 the annotation.

11 MS. FERNANDEZ-SALVADOR: Yes, so  
12 as part of my job, I get a lot of questions  
13 about how to implement annotations for  
14 substances on the National List. And  
15 unfortunately, I don't have the annotation in  
16 front of me but, basically, it says that  
17 federal -- that the sodium carbonate  
18 peroxyhydrate has to be used according to  
19 federal laws. And it has two issues. One,  
20 being that when you are in a foreign country,  
21 what are those federal laws? What should you  
22 be following? Should you be following the EPA

1 laws or should you be following the federal  
2 laws that jurisdic<sup>t</sup> over your country?

3 And then the second part is that  
4 when you look at sodium carbonate  
5 peroxyhydrate registration for the EPA, in  
6 some cases it has been used as algae control  
7 in irrigation systems and there is not going  
8 to be any food uses on the label because you  
9 are not going to be using that irrigation  
10 water, necessarily with that ingredient as a  
11 pesticide.

12 So, there is confusion around how  
13 it is supposed to be implemented and we just  
14 wanted to have the analysts discuss that at  
15 some level and realizing that there is no  
16 resolution to it. Just give us a bit of  
17 guidance.

18 CHAIR STONE: Really?

19 MEMBER FELDMAN: She's the best --

20 CHAIR STONE: Go ahead.

21 MEMBER FELDMAN: -- and we need  
22 her.

1 MS. FERNANDEZ-SALVADOR: Thanks,  
2 Jay.

3 MEMBER FELDMAN: Yes, you know how  
4 I feel about you, Lindsay.

5 If you could just inform the  
6 Board, just spend a little bit of time just  
7 explaining to us the difference between  
8 generic and formulated substances and the  
9 division of responsibilities between NOP,  
10 NOSB, and MROs into review organizations. And  
11 the kinds of problems we should be aware of  
12 and look out for or the Board should be aware  
13 of as we delve into this issue.

14 MS. FERNANDEZ-SALVADOR: Well, I  
15 can answer the first part of the question  
16 about what is the difference between generics  
17 and formulateds. I can't answer your second  
18 question. It is out of my purview.

19 But the difference between  
20 generics and brand name products is the fact  
21 that there is raw ingredients that go into a  
22 formulated product so that the manufacturer

1 can market that product versus a generic  
2 material that is manufactured in a way that is  
3 then further formulated.

4 It is kind of complex but Blood  
5 Meal is both a brand name product and a  
6 generic material and it is when the  
7 manufacturer puts a brand on it and  
8 intentionally manufacturers it in a way that  
9 they intend for it to have some sort of  
10 marketable value.

11 And so generic materials will be  
12 formulated sometimes because in this world,  
13 they are manufactured in certain ways. They  
14 are not necessarily manufactured according to  
15 what we consider to be a singular generic  
16 material. And so, I think you are going to  
17 have to consider it on a case-by-case basis.

18 CHAIR STONE: Thank you, Lindsay,  
19 very much.

20 MS. FERNANDEZ-SALVADOR: Thank  
21 you.

22 CHAIR STONE: Gwendolyn to the

1 podium and Allyson Kelly on deck.

2 MS. WYARD: All right, good  
3 morning. My name is Gwendolyn Wyard and I am  
4 the Regulatory Director of Organic Standards  
5 and Food Safety for the Organic Trade  
6 Association. I appreciate being here, having  
7 this opportunity. I realized as I was coming  
8 here that this is my 20th consecutive NOSB  
9 meeting. And I am not sure what to say about  
10 that other than thank you for your service and  
11 thank you for the job security. Hopefully, I  
12 can offer some perspective that I have gained  
13 over sitting through these meeting and  
14 particularly with materials.

15 I want to address an agenda topic  
16 today, glycerin. I am going to dive right in.  
17 I'm not sure how well you can see the screen.  
18 I need glasses.

19 So, I am going to try to tease out  
20 some of the issues with glycerin. First, I  
21 want to say we are really excited about the  
22 petition to remove glycerin. We are always in

1 support of a petition to remove the material.  
2 We would also like to see glycerin come off  
3 the national list, if there is an adequate  
4 supply of organic forms available.

5 Looking at this chart, the  
6 concerns that we do have, however, is the on-  
7 demand data that we have collected from our  
8 membership. In terms of the amount in the  
9 petition that the manufacturers are able to  
10 produce, our members are telling us that the  
11 demand is surpassing that by two to three  
12 times. So, that is a big issue is making sure  
13 we do in fact have the supply. And the other  
14 issue is the classification of materials. We  
15 have a draft out there that final is pending.

16 One of the reason that this is so  
17 important is that in the made with category,  
18 any non-agricultural needs to be on the  
19 National List and the 30 percent you are  
20 allowed to use non-organic agricultural  
21 ingredients but in the made with, the non-  
22 agriculturals have to be on the National List.

1                   So, when the petition first came,  
2                   I was contacted by several members saying  
3                   well, if glycerin comes off the national list  
4                   altogether, I wouldn't be allowed to use  
5                   anything but the agricultural or the organic  
6                   form in the made with category. The  
7                   regulations do not require organic in the made  
8                   with category. There is also no requirement  
9                   to use organic in natural flavors.

10                   If it were to come off the  
11                   National List altogether, certifiers would  
12                   need to be able to clearly make a  
13                   classification decision to say to whoever is  
14                   requesting its use, you can use the  
15                   agricultural form only. But you can see here  
16                   as I interviewed various certifiers, the form  
17                   in the non-agricultural, it is either with the  
18                   hydrolysis fats and oils, you can have the  
19                   saponification, which would use sodium  
20                   hydroxide or it can be used through steam  
21                   splitting, a combination of pressure and  
22                   temperature. Some certifiers do that as

1 agricultural.

2           The form that is being petitioned,  
3 which is the microbial fermentation of corn  
4 starch, that is analogous to citric acid.  
5 That is currently classified as non-  
6 agricultural.

7           So, we are not saying to keep  
8 glycerin on the National List to solve the  
9 classification problem but you might need to.  
10 And one of our suggestions is that you do keep  
11 it on the National List to classify.

12           And if you look at this next, in  
13 terms of what we are suggesting here, that if  
14 you were to keep it on the National List, you  
15 could clarify, because of the ambiguous nature  
16 of it, that non-organic agricultural forms  
17 could be used and made with the products, just  
18 to be clear, the pending guidance of those is  
19 something that we need to clarify this issue.

20           What I am trying to -- the point  
21 here is that the solution that OTA has brought  
22 up in our comments and I am happy to address

1 the suggestion that Bill Wolf just put on the  
2 table, in terms of whether we would agree with  
3 that compromise, if you want to ask questions  
4 about that, but we are suggesting that you  
5 retain glycerin on 605(b) and annotate it that  
6 it may be used only when it is not available.

7 And I am happy to answer any  
8 questions you have about this progression  
9 going from its current status to the solution  
10 that we are offering up. Thank you.

11 CHAIR STONE: Harold.

12 MEMBER AUSTIN: Good morning,  
13 Gwen.

14 MS. WYARD: Good morning.

15 MEMBER AUSTIN: Could you go ahead  
16 and finish your part about your compromise,  
17 Bill Wolf's compromise that he just brought?

18 MS. WYARD: Sure. And I may need  
19 to bring Bill up here, if I didn't completely  
20 understand because I am just hearing it for  
21 the first time but I will try to describe the  
22 difference between what we are saying and what

1 Bill is saying. We are suggesting that  
2 glycerin be placed on the Agricultural List,  
3 which is 205.606, allowed non-organic  
4 agriculturals. That it would be placed there  
5 so that any agricultural form would need to be  
6 sourced as organic. It could only be used if  
7 it was commercially unavailable.

8 We are also requesting that  
9 glycerin be retained on the allowed non-  
10 agricultural synthetic list, which is 605(b).  
11 The annotation there again would be that you  
12 would be required to use organic, unless it is  
13 unavailable. We are also suggesting that it  
14 be clarified that non-organic agricultural  
15 forms could be used -- could be allowed in the  
16 made with category.

17 What Bill is suggesting is that it  
18 be placed on 606, the allowed non-organic  
19 agricultural list, so that it would be --  
20 organic would be required, unless commercially  
21 unavailable. On 605(b), he is saying to  
22 restrict it only, so it would only be allowed

1 in natural flavors and would only be allowed  
2 in made with products.

3 We would have to work through that  
4 a little bit more. Any way you slice this, I  
5 think that we do need to look at an  
6 intermediate step. Because if you look at the  
7 current status, right now we have got allowed  
8 synthetic in organic products, made with  
9 products, and natural flavors. If you take it  
10 off the National List, you have got organic  
11 being the only form that would be allowed when  
12 we have commercial availability issues and it  
13 would force organic forms potentially in  
14 products that are not required, have no  
15 requirement for organic.

16 The solution up here essentially  
17 is that you are saying you can use non-organic  
18 only when organic is commercially unavailable.  
19 This would be a huge step in the right  
20 direction. It also would provide a huge  
21 incentive for natural flavors because right  
22 now, if you take glycerin off the National

1 List, you couldn't use glycerin in natural  
2 flavors. And I am positive that the natural  
3 flavor manufacturers have not been brought  
4 into this conversation, that there hasn't been  
5 a close look at the supply as it relates to  
6 natural flavors because this was a nuance that  
7 really came up at the last minute.

8 What we are suggesting would  
9 require natural flavor manufacturers to source  
10 organic. So, it gets us going in the right  
11 direction. This would be the first time that  
12 for natural flavors they would be required to  
13 use organic, unless it is commercially  
14 unavailable. That is a huge step right there.  
15 And it gets us going down the road because you  
16 are going to be reviewing natural flavors for  
17 the 2017 Sunset. So, it is a good step in the  
18 right direction.

19 CHAIR STONE: John?

20 VICE CHAIR FOSTER: Thank you.

21 Thank you for that.

22 I was going to ask about the

1 natural flavor deal but I think you covered  
2 what I needed to cover. My question was have  
3 you looked at glycerin's use in personal care  
4 products and how the supply and demand of that  
5 is quite a bit different for food use. I know  
6 you know that. So, could you talk about that?  
7 Because that has not been part of the  
8 discourse so far.

9 MS. WYARD: Yes, I think the large  
10 majority of the glycerin is being used in  
11 personal care products. And I think that also  
12 will speak to Harold's question earlier about  
13 the food safety aspects is that most of the  
14 glycerin is being manufactured for personal  
15 products and they have completely different  
16 requirements when it comes to food safety than  
17 for food products.

18 Glycerin is being used in food  
19 products and I can't say compare one to the  
20 other but I do know that in certified, NOP-  
21 certified products, there is a significant  
22 amount of glycerin that is being used. But it

1 is the food products, the real difference in  
2 terms of looking at what is significant about  
3 personal care versus food is that a lot of the  
4 glycerin manufacturers, including the  
5 manufacturers that are making the organic  
6 glycerin would need to take on additional food  
7 safety inspections and certifications to meet  
8 the requirements that are being requested from  
9 the food companies.

10 CHAIR STONE: Carmela?

11 MEMBER BECK: Yes, you talked  
12 about -- can you hear me?

13 You talked about the pending  
14 classification guidance. And so can you tell  
15 us how the finalized guidance would support  
16 the solutions that you are proposing?

17 MS. WYARD: Sure. Thanks,  
18 Carmela.

19 It goes back to the question, the  
20 issue that I brought up with made with  
21 products, that the classification of a  
22 material determines what products something

1 can and cannot be allowed in.

2 So, if you had to make a decision,  
3 if a certifier had to figure out whether or  
4 not to allow the agricultural form or the non-  
5 agricultural form, they would need that final  
6 guidance to be able to clearly make that  
7 determination and also so that all certifiers  
8 are consistently making those decisions.

9 So, classification becomes a big  
10 part of this matter and it is coming soon but  
11 it is not out right now. Again, it is not a  
12 show stopper but it is a very important part  
13 of this.

14 You know we suggest that this is a  
15 really good example of something that needs  
16 further deliberation. The suggested changes  
17 that are in our comments, this is not  
18 something that should be made at this meeting,  
19 this would be a substantial change in going  
20 back to the clarification about substantial  
21 changes made to a proposal. This is something  
22 that I really encourage everybody to take a

1 closer look at, take some time and come up  
2 with a recommendation that will take into  
3 consideration all of these points that have  
4 been brought up today.

5 CHAIR STONE: Great. Thank you,  
6 Gwendolyn. Thanks very much.

7 Allyson Kelly to the podium and  
8 Romalda Allsup on deck.

9 MS. KELLY: Good morning. My name  
10 is Allyson Kelly. I am the Senior Program  
11 Manager for Organic Compliance with the Hain  
12 Celestial Group. We wish to offer comments on  
13 the notification of Sunset process and the  
14 Sound and Sensible Initiative.

15 On November 16, 2013, AMS posted a  
16 Federal Register notice clarifying the process  
17 for reviewing materials that are up for Sunset  
18 review. The process allows increased  
19 opportunities for public comment over two NOSB  
20 meetings.

21 To remove the materials from the  
22 National List during Sunset review, a decisive

1 two-thirds vote of the Board is required.  
2 This is consistent with OFPA and the two-  
3 thirds vote that is required to add a material  
4 to the list.

5 The previous Sunset clauses  
6 allowed just two-fifths of the NOSB members to  
7 essentially vote a material off the list after  
8 it was already scrutinized to be safe and  
9 necessary for organic production or handling  
10 by two-thirds of the Board. This old process  
11 amounts of a tyranny of the minority and is  
12 inconsistent with our democratic system of  
13 government.

14 We have heard that this revised  
15 process will make it extremely difficult to  
16 make changes to the National List but I do not  
17 believe this is accurate. Two-thirds of the  
18 Board has voted to change the listing of  
19 pectin and to require organic forms of  
20 lecithin, yeast, and silicon dioxide, when  
21 commercially available.

22 We are confident that substances

1 that are no longer appropriate to organic  
2 systems will be removable through this voting  
3 requirement. We want to express our support  
4 for this clarified sunset review process.

5 We would also like to again  
6 express our support for the Sound and Sensible  
7 Certification Initiative. As Miles has  
8 stated, certifying agents must ensure organic  
9 integrity, while setting sensible limits on  
10 paperwork. We could not agree more.

11 I am required to maintain and  
12 renew annually the organic certifications for  
13 more than 20 manufacturing facilities and  
14 three corporate handler certificates. When  
15 the manufacturing facilities have their annual  
16 inspections, we are required to print out  
17 massive amounts of paperwork. Inspectors  
18 scrutinize the facility, and every ingredient  
19 and every formula, and every label. Then when  
20 we have our corporate audits, some inspectors  
21 asked for the same information on ingredients  
22 and formulas that are used in manufacturing

1 facilities that were already inspected. This  
2 is redundant and totally unnecessary.

3 We also have the problem that some  
4 ACAs do not honor the certification decisions  
5 of other ACAs. If products of a manufacturing  
6 facility have been certified by an NOP-  
7 approved ACA but the label on the product  
8 lists a different ACA, the label ACA should  
9 respect that the product has already been  
10 certified. They should not require the  
11 product formulas and the documentation for the  
12 ingredients. This duplication is a huge waste  
13 of time because the products have already been  
14 certified. These duplications do not ensure  
15 organic integrity but they do ensure  
16 frustration and waste.

17 Since not all companies are  
18 certified by the same accredited certifying  
19 agency, these ACAs must trust that other ACAs  
20 are doing their due diligence, especially with  
21 regards to documentation review and  
22 certification. It is important that we all

1 stay close to the practices that form the  
2 foundation of organic.

3 We wish to thank the NOSB for  
4 their service. We also want to thank Miles  
5 McEvoy and the dedicated staff at NOP for all  
6 of their hard work and efforts to support  
7 organic foods in the United States. Thank  
8 you.

9 CHAIR STONE: Thank you, Allyson.  
10 Questions? Jay.

11 MEMBER FELDMAN: And I would like  
12 to thank Hain for its leadership in growing  
13 organic label and the organic market.

14 I would really urge the company,  
15 however, to re-read democratic principles that  
16 govern democracy in the United States, which  
17 protects against the tyranny of the majority.  
18 And that is why we have the two-thirds  
19 decisive vote. That is why Robert's Rules of  
20 Order has a two-thirds vote to cut off debate.  
21 That is why we protect the minority in this  
22 country.

1                   So, my question is, have you  
2                   looked at --

3                   CHAIR STONE: Jay, is there is a  
4                   question in there?

5                   MEMBER FELDMAN: Yes. Have you  
6                   looked at the implication that this --

7                   MEMBER RICHARDSON: Point of  
8                   order. Mr. Chair, point of order.

9                   MEMBER FELDMAN: I'm asking a  
10                  question. Have you looked at --

11                  MEMBER RICHARDSON: Point of  
12                  order, Mr. Chair. I would like to request,  
13                  Mr. Chair, that you direct Mr. Feldman to try  
14                  not to lecture the audience or the listening  
15                  --

16                  (Applause.)

17                  CHAIR STONE: Jay, if you could --

18                  MEMBER FELDMAN: Thank you. Is  
19                  Hain worried about alienating organic  
20                  consumers who are concerned that their views  
21                  are being discounted in the Sunset process?

22                  MS. KELLY: Well, Jay, this is an

1 issue that is really close to my heart.

2 I work for Hain because I believe  
3 in organic. As somebody that is recently  
4 married and considering soon becoming a  
5 mother, I am extremely concerned with the  
6 future of organic. And I think Hain is doing  
7 everything it can to support that. The  
8 organic program is never going to grow, unless  
9 we allow a little bit of change.

10 I am confident that the change to  
11 the Sunset review process, as I said, would  
12 still allow materials to come off of the list  
13 as they see fit. I don't think that things  
14 are going to remain on the list in perpetuity,  
15 as I have heard said over the past couple of  
16 meetings.

17 I know that there is a vision of  
18 Hain as this big corporate, and I am the  
19 organic program. I do the -- the entire  
20 program is mine by myself. I don't consider  
21 myself big nor corporate. I am really trying  
22 to do the right thing by organic because I do

1 believe in it. It is something that I am  
2 master of control of over at Hain and it is  
3 very important to me.

4 MEMBER FELDMAN: Thank you.

5 CHAIR STONE: Thank you, Allyson.

6 MS. KELLY: Thank you.

7 CHAIR STONE: Romalda Allsup and  
8 Cindy Elder on deck.

9 Welcome.

10 MS. ALLSUP: Hi. My name is  
11 Romalda Allsup. I am a retailer from Austin,  
12 Texas. As a member of the Cornucopia  
13 Institute, I am here to lobby and to present  
14 testimony because I want to ensure the future  
15 integrity of organic food.

16 I think future generations are  
17 counting on us to improve in strength and  
18 organic standards. Organic farmers worked in  
19 pursuit of better methods and add to the  
20 science of food production. They deserve our  
21 support.

22 For the consumer, a credible

1 organic label can only exist when there are  
2 strong, verifiable standards in place. Food  
3 production needs to be honest and transparent.

4           There is a question coming up  
5 about the aquaculture materials that the  
6 National Organic Program is requesting review  
7 of the aquaculture materials before they have  
8 published the aquaculture standards. It is  
9 placing pressure on the National Organic  
10 Standards Board to approve aquaculture  
11 materials prior to creating an overall  
12 standard. And that looks like it is putting  
13 the cart before the horse.

14           Organic agriculture response to  
15 site-specific conditions and promotes  
16 ecological balance. The raising of aquatic  
17 plants is fundamentally different from the  
18 raising of terrestrial crops. That is  
19 essential to take these differences into  
20 account, considering both the regulations and  
21 any possible additions of synthetic materials  
22 to the National List.

1           The fact that organic regulations  
2           have not yet been developed and approved by  
3           both the NOSB and the NOP indicates these  
4           differences have not been fully resolved.

5           So, specifically for aquatic  
6           plants, the following petition materials must  
7           be rejected: chlorine, lignin sulfonate,  
8           carbon dioxide, vitamins, and micronutrients.  
9           The main reason these materials must be  
10          rejected is because there are no organic  
11          aquaculture standards by which to judge the  
12          use of these materials. None of these  
13          materials have technical reports for aquatic  
14          use.

15          Carbon dioxide is presently used  
16          as a processing agent in food manufacturing  
17          but in a completely different way than it  
18          would be used in water. Chlorine has been  
19          around to sterilize in some situations where  
20          it can be washed off. But if it is put into  
21          the water, it can't be taken out.

22          Lignin sulfonate has been fully

1 rejected by the Livestock Subcommittee. There  
2 is lots to be said about that stuff.

3           Micronutrients and vitamins cannot  
4 be verified by the label produced because they  
5 use proprietary processes. So, we don't know  
6 what is in them. There is clearly not enough  
7 evidence or information on any of these  
8 materials to understand their potential  
9 impacts. There is also no designation if they  
10 will be used in open-water culture systems or  
11 closed ones. The world's oceans and waterways  
12 are in crisis. Ocean acidification is  
13 happening with rising CO2 levels, placing the  
14 entire food web at risk.

15           We have times where supporting  
16 leading to massive fish die-offs and food  
17 poisoning in humans. Trash and nutrient  
18 pollution is rampant. Sixty percent of  
19 coastal rivers and bays in the U.S. have  
20 moderate to severe nutrient pollution. It is  
21 truly frightening to consider that organics  
22 might embrace an aquaculture model that

1 contributes to the further peril of our  
2 oceans, waterways, and wild aquatic organism.

3 Therefore, please reject all  
4 aquaculture provisions or, at the least,  
5 limiting them to include a five-year Sunset  
6 date.

7 Thank you for allowing me to  
8 present testimony. If you have questions  
9 about this, I encourage you to speak to one of  
10 the Cornucopia staff members present at this  
11 meeting or, at your option, call them if they  
12 are experts if you have questions that need to  
13 be answered.

14 Thank you.

15 CHAIR STONE: Thank you for your  
16 time.

17 Cindy Elder to the podium and Kim  
18 Miller on deck.

19 MS. ELDER: Good morning. I am  
20 Cindy Elder, Inspector Services Coordinator  
21 and Reviewer at Organic Crop Improvement  
22 Association. I am presenting this on behalf

1 of our Board of Directors and membership.

2 We are a producer, processor, and  
3 handler members of the Organic Crop  
4 Improvement Association International. OCIA  
5 functions in the United States as a network of  
6 chapter and direct members and as a USDA  
7 National Organic Program Accredited  
8 Certification Agency that provides  
9 certification services to more than 9,000  
10 people in North, Central, and South America  
11 and Asia. Our comments on the National  
12 Organic Standards Board in Spring 2014 meeting  
13 follow.

14 OCIA thanks the NOSB for its  
15 efforts to maintain organic integrity.  
16 However, OCIA is concerned about the lack of  
17 published standards for hydroponics,  
18 aquaculture, retailers, and seed growers. As  
19 a certifier, we need clear standards to  
20 certify operations.

21 Consumers expect organic products  
22 to be free of genetically engineered

1 organisms. Organic producers are seed savers.  
2 Organics integrity would diminish if seed is  
3 contaminated with transgenic traits and then  
4 saved.

5           Retailers are a gap in the audit  
6 trail. We agree with the Cornucopia  
7 Institute's comments to the NOSB that quote,  
8 consumers expect the organic label to name the  
9 final holder of the product, as well as the  
10 name of the handler's certification agency.  
11 Stakeholders who initially developed the  
12 Organic Foods Production Act assumed that an  
13 audit trail would be available to track  
14 products and ingredients back to the original  
15 producers. The broad question to be addressed  
16 is what procedures must be in place to ensure  
17 that consumer expectations are met in terms of  
18 trust in the organic labeling and retail  
19 process, end quote.

20           Additionally, OCIA agrees with all  
21 of the Cornucopia's comments on research  
22 priorities. We specifically urge the NOSB to

1 continue research on the unwanted presence of  
2 genetically engineered organisms and organics.  
3 Consumers expect organic products to be  
4 transgene free. OCIA members are concerned  
5 about transgenic trespass because organic  
6 producers are seed savers and organics  
7 integrity starts with seed. The NOP has  
8 guidance on pesticide residue testing but  
9 certifiers need further guidance on testing  
10 for presence of genetically engineered  
11 organisms.

12 Organic farmers should be able to  
13 save seed without risking the spread of  
14 genetic contamination. There is a lack of  
15 effort on the part of non-organic operators to  
16 prevent contamination. Non-organic producers  
17 should not solely be responsible for  
18 uncontrollable pollen drift onto neighboring  
19 organic fields. Seed developers of the  
20 genetically engineered crops need to take  
21 responsibility for genetic contamination.

22 We recognize that seed purity can

1 extend beyond the authority of the NOSB but we  
2 encouraged continued discussion on this topic,  
3 especially with organic seed producers.

4 CHAIR STONE: Thank you very much.

5 MS. ELDER: Thank you.

6 CHAIR STONE: Jean?

7 MEMBER RICHARDSON: Just one quick  
8 question. You mentioned your desire to make  
9 sure there is no -- your work to keep GMO out  
10 of the food chain. Do you certify livestock  
11 as well?

12 MS. ELDER: Yes, we do.

13 MEMBER RICHARDSON: When you  
14 certify livestock, do you ask the livestock  
15 producers to verify that the vaccines that  
16 they are using are non-GMO?

17 MS. ELDER: I would need to refer  
18 that question to our livestock staff and  
19 provide you an answer at a later time.

20 MEMBER RICHARDSON: Great. I  
21 would really appreciate an answer.

22 MS. ELDER: Okay.

1                   MEMBER RICHARDSON: Thank you very  
2 much.

3                   CHAIR STONE: Great. Thank you,  
4 Cindy. Tim Miller to the podium and Steve  
5 Walker on deck.

6                   MR. MILLER: My name is Tim  
7 Miller. I am in my 25th year of following the  
8 rules of being a five-acre certified organic  
9 grower who uses only rainwater for production.  
10 Recently the State of Texas has proposed a  
11 five-lane highway within 200 feet of my farm.  
12 No standards exist regulating vehicle  
13 emissions in soil and rainwater. Will I be  
14 polluted out of business?

15                   I am member of the Cornucopia  
16 Institute and I am here today as a citizen  
17 lobbyist. I have volunteered to help present  
18 testimony because I want to ensure the  
19 integrity of organic food.

20                   The NOP should not request review  
21 of aquaculture materials when they have not  
22 published the aquaculture standards. It is

1       unsettling that the NOP is placing pressure on  
2       the NOSB to approve aquaculture materials  
3       prior to creating an overall standard. I want  
4       to highlight a couple of powerful comments  
5       sent to the NOSB on aquaculture from John  
6       Botterich of Cannon Beach, Oregon.

7                   My family and I have been  
8       commercial salmon fishermen for decades. My  
9       four sons have fished with me since they were  
10      little and have employed healthy work and a  
11      good living, especially since wild salmon  
12      prices have recovered from the impact on the  
13      market of cheap farmed fish.

14                   Now, I understand the aquaculture  
15      industry is asking for consumers from the USDA  
16      to swallow that in an attempt to increase its  
17      appeal to concerned consumers farmed fish can  
18      be labeled organic. For the sake of the  
19      American consumer, we hope that the USDA won't  
20      cave into the aquaculture industry's special  
21      interest. Organic should mean something  
22      incorruptible about the quality of our food.

1 Farmed fish feedlots damage marine ecosystems  
2 and harm wild fish populations. Disease,  
3 parasites, pollution, escapees, all threaten  
4 the wild fish that live in the proximity, even  
5 briefly, to industrial fish pens. The  
6 aquaculture industry's efforts to address  
7 these problems with vaccines, antibiotics,  
8 synthetic feed, chlorine, will invite mockery  
9 of the term organic if it labels farmed fish.

10 From Bernell Waltz of Bellingham  
11 Washington: Organic standards require animals  
12 to exhibit their natural behavior. Wild  
13 salmon and other fish swim for lifetimes  
14 traveling hundreds of miles and confining this  
15 fish is a direct violation of the core organic  
16 principles.

17 Marine fish farms replicate some  
18 of the worst practices of a confined animal  
19 feedlot operations known as CAFOs, which would  
20 never receive organic certification, or at  
21 least they shouldn't, impact so largely under  
22 the waterline and out of sight so the fish

1 farm industry has escaped scrutiny that would  
2 have closed down comparably dirty land-based  
3 operations. Marine net pens allow excess  
4 feed, pathogens, parasites, and voluminous  
5 amounts of pollution to flush into the  
6 surrounding waters putting other aquatic  
7 species at risk.

8           Farmed fish escape, competing with  
9 wild fish, for wild species, for food and  
10 habitat. More than 600,000 non-native  
11 Atlantic salmon escaped from net pens into  
12 Washington State waters in four years alone.  
13 Millions of farmed fish escaped worldwide, he  
14 concludes.

15           I ask you that you please reject  
16 all aquaculture proposals or, at the very  
17 least, amend them to include a five-year  
18 Sunset date.

19           Thank you for allowing me to  
20 present testimony. If you have questions  
21 about this testimony, I encourage you to speak  
22 with one of the Cornucopia staff members

1 present at this meeting.

2 CHAIR STONE: Thank you, Tim.

3 MR. MILLER: Thank you.

4 CHAIR STONE: Steve Walker to the  
5 podium. Allen Lewis on deck.

6 MR. WALKER: Hi, I'm Steve Walker  
7 and I am the processing and compliance manager  
8 with MOSA. We certify about 1600 operations,  
9 mostly in the upper Midwest. We submitted a  
10 handful of written comments last fall and a  
11 recently revised comment on retail  
12 certification.

13 But here, I want to talk about  
14 something a bit different, kind of a personal  
15 story that speaks to themes of the past couple  
16 of days and to balance.

17 At the San Diego Accredited  
18 Certifiers Association Training a couple  
19 months' ago, the NOP stated that organic  
20 promotion is not the certifier's role. Now,  
21 to be fair, I can't quite frame the context of  
22 that statement but I do know it raised my

1 dander. I thought, wait a minute, that is why  
2 I do this work. And we just rewrote MOSA's  
3 mission statement, which now says we promote  
4 organic integrity through practical, reliable,  
5 and friendly certification services.

6 Now, I understand the boundaries  
7 we need to maintain as certifiers. We have to  
8 enforce the regulations consistently and with  
9 some detachment. But I also truly believe  
10 that I am from the government and I am here to  
11 help. I help by trying to make oversight  
12 practical, as well as sound, and promoting the  
13 human values that this industry was founded  
14 upon.

15 In my 50 years, when I found good  
16 news, I have learned to share it. I think  
17 that for most of us, it is this organic good  
18 life that brings us here. We want to promote  
19 that.

20 My organic roots probably link  
21 back to a sort of voluntary simplicity taught  
22 by my mother. I also have somewhat of an

1 aversion to boxes. After college, I took the  
2 road less traveled. In my late 20s, I found  
3 myself trying run a backyard homestead and  
4 found a good life. Many here are probably  
5 familiar with the influential 1950s book on  
6 homesteading, *Living the Good Life: How to*  
7 *Live Simply and Sanely in a Troubled World* by  
8 Helen and Scott Nearing.

9           The Nearings left the city with  
10 goals of economic independence, not tied to  
11 the commodity and labor markets, well-being,  
12 where contact with the earth and homegrown,  
13 organic food would play a large part, and with  
14 social and ethical ideals to avoid  
15 exploitation of planète insolite, they wrote:  
16 "The good life is more than a yearning for the  
17 good, the beautiful, the true. It includes  
18 decision, will, determination, and effort."

19           And so I find myself today  
20 struggling to promote this organic good life  
21 amidst sometimes divisive and damaging  
22 rhetoric. *La dolce vita* is an Italian term

1 for the good life, the sweet life filled with  
2 abundance, drink, a culture of good food. We  
3 all know it. We get to hang with enlightened  
4 people in nice places like San Diego, and San  
5 Antonio, and Viroqua, Wisconsin. We eat proud  
6 salads and stinky cheese and know the sweet  
7 smell of healthy soil. La dolce vita is good  
8 news worth sharing.

9 But "La Dolce Vita" is also a 1960  
10 Fellini film, which was really a study of  
11 decay and world evolution of modern culture.  
12 Sometimes when we have too much of a good  
13 thing, we have challenges of balance and  
14 respect.

15 Which brings me back to the  
16 constant balancing act of maintaining the  
17 organic standards. The Nearings warned keep  
18 out of the system's clutches and you have a  
19 chance of subsistence, even if the oligarchs  
20 disapprove of what you think and say and do.  
21 Accept the system with its implications and  
22 ramifications and you become a helpless cog in

1 an impersonal machine operated to make rich  
2 men richer and powerful men more powerful.  
3 This organic dolce vita is a desperately  
4 needed alternative for our troubled world. It  
5 requires balance. It is not easy work. We  
6 can't turn a blind eye to the challenges but  
7 we must promote what is good. We have a lot  
8 of good life stories to tell and organic  
9 operators urgently need organic consumers to  
10 hear more of our good news.

11 (Applause.)

12 CHAIR STONE: Thank you, Steve.  
13 Well done.

14 Allen Lewis to the podium and Ib  
15 Hagsten on deck.

16 MR. LEWIS: Hi, Allen Lewis. I am  
17 here today as a private citizen. I do manage  
18 75 retail handling certificates, including --  
19 plus 110,000 square foot food processing  
20 facility that is certified organic.

21 I have a higher level comment  
22 today that comes in three parts and a

1 conclusion. I am going to wing this and get  
2 through it quickly.

3 First is herding hippies. This is  
4 what I described to our investor community  
5 when we are talking about people who have  
6 worked in organic food and seeing this  
7 community grow up over 30 years and then say,  
8 oh, by the way, SEC compliance. Let me tell  
9 you what that means.

10 But let's look at our community  
11 here and how we describe it. Collaboration,  
12 consensus, collective thought, citizen  
13 constituency, compromise, constant change, and  
14 chaos and confusion because ultimately, we  
15 have an organization chart. We all report to  
16 ourselves and to each other in this very flat  
17 web of connections.

18 Each of us is pursuing our  
19 economic and philosophical desires but we have  
20 agreed that we will not damage the collective  
21 well-being at the whole at the same time.

22 Observation number two, let's talk

1 about government bureaucracy. Here are some  
2 new words, hierarchies, rules, procedures,  
3 rank, reporting, charts, authority, fealty,  
4 status, compliance, titles, order,  
5 regulations.

6 And to greatly oversimplify, it is  
7 the job of a government and a bureaucracy in  
8 particular to impose order, eliminate  
9 unexpected outcomes, and quell or at least  
10 manage dissent.

11 So, observation number three,  
12 nobody is surprised that the USDA, as a  
13 bureaucracy, is utterly terrified of the  
14 organic community as a chaotic collaborative  
15 environment. But let's be honest and open.  
16 These are not opposites. These are different  
17 cultures.

18 Finally, I understand, again, why  
19 the USDA is afraid of Sunset and that is what  
20 my comment is about. The Sunset process that  
21 the drafters of the original Organic Foods  
22 Production Act envisioned understood these two

1 different cultures, understood the great mass  
2 collaborative chaos of a collective culture  
3 over here and they put the NOSB in place to  
4 literally translate the language and the  
5 desires, the consensus here into proposals and  
6 verbiage that the bureaucracy could  
7 understand, take up, and act on in the way  
8 that it does.

9           But Deputy Administrator, the  
10 organic community needs the Sunset process the  
11 way it was written because the people who  
12 drafted that understood that with a community  
13 and a culture like this, we had to be brought  
14 together every year and forced to reach a new  
15 consensus; force the outliers to acknowledge  
16 the common good; force new ideas to come in  
17 through that collaborative process; and then  
18 filter it through the NOSB and drop it off in  
19 the NOP's lap.

20           I understand that the original  
21 Sunset process is frightening and chaotic and  
22 uncontrolled against every value that a

1 regulatory culture has but I would ask the  
2 USDA to understand that it is critical to our  
3 community to go through this complicated ugly  
4 process in order to do the job that we need to  
5 do.

6 Thank you.

7 (Applause.)

8 CHAIR STONE: Thank you, Allen.

9 Ib Hagsten to the podium and  
10 Margot Mastroud on deck.

11 DR. HAGSTEN: Good morning. My  
12 name is Dr. Ib Hagsten, an independent,  
13 accredited organic inspector, serving a third  
14 term as Chair of IOIA, the International  
15 Organic Inspectors Association.

16 Ladies and gentlemen,  
17 distinguished members of the NOSB and  
18 dedicated staff of the NOP, thank you for the  
19 opportunity to elaborate on the issues of  
20 interest to the organic inspectors.

21 IOIA has appreciated the  
22 opportunity to work with NOP leadership, NOSB

1 representatives, and working group members of  
2 the ACA of the NOSB's Sound and Sensible  
3 Initiative discussion document.

4 There were three issues that we at  
5 IOIA believed strongly needed to be improved  
6 and streamlined for the benefit of the  
7 consumer, the certifier, the NOP, and the  
8 organic inspectors who are the only eyes,  
9 ears, and noses on the ground in the Program.

10 Firstly, that the NOP auditors had  
11 to learn to sing from the same page because in  
12 the past, the certifiers seemed to be sitting  
13 on pins and needles wondering how the next NOP  
14 auditor would interpret their paperwork.

15 I was encouraged to hear from  
16 Miles McEvoy last summer that the week-long  
17 auditor training had been very successful. My  
18 certifier survey indicates that the NOP  
19 auditors were singing off the same page and  
20 were organic in knowledge in the recent  
21 season.

22 Secondly, we inspectors saw out on

1 the farm the discrepancies between the organic  
2 system plan and the observed practices. We  
3 could fix it or not. Most likely, the  
4 discrepancy is an improved farming practice,  
5 yet it is not identical to the NOSP -- to the  
6 OSP.

7 So, what do we do? Do we  
8 compliment the farmer? Do we have the farmer  
9 make the change? Or do we, the inspector,  
10 make the change and then inform certifier?

11 Our industry is pleased to see the  
12 NOP directive that helped streamline this  
13 sticky issue. Each certifier I work with has  
14 developed a policy that makes it clear to the  
15 farmer, to the inspector, and to the  
16 reviewers, what is expected.

17 This is another example of where  
18 an organic integrity issue concerned most  
19 advantaged to a simple yet helpful NOP  
20 directive.

21 And lastly, at the end of the  
22 inspection, we are required to complete an

1 exit interview with the farmer that one,  
2 informs the certifier of observed non-  
3 compliances and changes in the OSP.

4 Two, informs the farmer of our  
5 findings and assures comprehension of the  
6 issue. And three, allows the inspector to  
7 comment on things done well.

8 I witnessed exit interview forms  
9 from a blank piece of paper to a detailed  
10 form. However, I am encouraged to report that  
11 your workshops and conference calls initiated  
12 by the ACA two improvements have already  
13 occurred. One, each certifier has done a  
14 better job during the 2014 training of  
15 communicating their expectations from the exit  
16 interview and several of them have updated the  
17 exit interview form.

18 The exit interview form should be  
19 the capstone of the on farm inspection and  
20 serve as a guidance document for the review.  
21 Thanks to the cooperation among the certifiers  
22 and with the IOIA in the dialogue, I am

1 pleased to report that visibly improved exit  
2 interview process that makes the expectations  
3 more simple and more sensible for all parties.  
4 We are encouraged to see the focus on  
5 inspector qualifications during the last year.  
6 However, IOIA has noted the lack of  
7 commensurate emphasis on improved and uniform  
8 review of training and qualifications. And  
9 that would be the next area for focus, in our  
10 opinion.

11 In summary, IOIA thanks Mac and  
12 others for initiating the dialogue prior to  
13 the Portland meeting, where all parties were  
14 represented. It has been rewarding to note  
15 the improvements to the Sound and Sensible  
16 process related to inspectors and inspections  
17 that already have been implemented. And we  
18 commend the responsiveness of both the NOP and  
19 the certifiers.

20 Thank you.

21 CHAIR STONE: Thank you, Ib and  
22 thank you for your work on helping us decide

1 what is sound and sensible and getting it out  
2 on the ground. As you said, the inspectors  
3 are the face of organic to many people.

4 Is there any questions? All  
5 right, thank you very much.

6 DR. HAGSTEN: Thank you.

7 CHAIR STONE: Thank you for being  
8 here.

9 Margot Mastroud to the podium and  
10 Amanda Love on deck. Margot?

11 MS. MASTROUD: Good morning. My  
12 name is Margot Mastroud and I am a mother. I  
13 am a wife. I am a small business owner. I am  
14 a very concerned citizen. And I am here as a  
15 member of the Cornucopia Institute. I am here  
16 today as a citizen lobbyist.

17 I have volunteered to help present  
18 testimony because, as a mother and a wife, it  
19 is my honor and my duty to protect my family  
20 and to ensure that the organic food that I am  
21 feeding them keeps the integrity.

22 Today, I will talk about two

1 materials petitioned for crop production,  
2 vinasse and laminarin. Vinasse is a byproduct  
3 of conventional molasses processing, which  
4 itself is derived from sugar manufacturing.  
5 The raw materials, sugar cane and sugar beets  
6 are agricultural but many synthetic chemicals  
7 are added in these processes. Vinasse  
8 contains all of these chemicals, plus the  
9 yeast added in fermentation. The sugar beets  
10 and the yeast are likely genetically modified.  
11 Some vinasse is produced through natural  
12 processes. But other vinasse results from the  
13 industrial process that would classify it as  
14 synthetic.

15 We ask the Crops Subcommittee  
16 classify the appropriate forms of vinasse as  
17 synthetic. The proposal from the Crops  
18 Subcommittee to address this issue by amending  
19 NOP's draft guidance, known as NOP 5033 and  
20 5034 should be rejected for two reasons.  
21 First, this is draft guidance. It has not  
22 been implemented.

1                   Second, being guidance, it was  
2 written by the NOP and thus, it is subject to  
3 change by the NOP at any time without further  
4 input from the NOSB or the public.

5                   Laminarin is used to boost plant  
6 defense against disease. Laminarin is derived  
7 from a natural product, a seaweed. So, it  
8 might appear to be natural. However, it was  
9 derived through an extraction process, using  
10 synthetic materials, including sulfuric acid  
11 and sodium hydroxide. The chemicals are not  
12 removed from laminarin. Therefore, the final  
13 extracted product must be considered  
14 synthetic.

15                   The final product to be used by  
16 farmers must be reviewed by the entire NOSB to  
17 determine if it is compatible with organic  
18 production.

19                   The Cornucopia Institute is  
20 concerned about the process used to decide  
21 whether a material is synthetic or non-  
22 synthetic. We understand that the NOP

1 reviewed laminarin before the volunteer NOSB  
2 had a chance to review it. We would like to  
3 remind everyone that consumers trust the  
4 members of the NOSB to make decisions without  
5 the influence of the government. The NOSB has  
6 developed criteria on classifications of  
7 materials and the NOP should adopt and follow  
8 the criteria that the NOSB has already  
9 developed.

10 If you have questions about this  
11 testimony, I encourage you to speak with one  
12 of the Cornucopia staff members present at the  
13 meeting or, at your option, you can call one  
14 of the expert staff up to the microphone right  
15 now to answer your inquiries.

16 Thank you for your time.

17 (Applause.)

18 CHAIR STONE: Thank you, Margot.

19 Amanda Love to the podium and  
20 Gerald Davis on deck.

21 MS. LOVE: Hello. My name is  
22 Amanda Love. I am also known as The Barefoot

1 Cook. I live in Austin, Texas. I am a  
2 professional natural food chef. I cook with  
3 all organic natural food, nutrient-rich food.  
4 Also I have been a nutritionist for many years  
5 and I am a Board Member of the Cornucopia  
6 Institute.

7 I am here today on behalf of the  
8 Cornucopia Board to express our concern about  
9 recent NOP unilateral actions taken without  
10 the customary respect for NOSB members and the  
11 public.

12 The organic industry was built  
13 with grassroots support. The NOSB was  
14 established by Congress with a diversity of  
15 organic stakeholders to gather public input on  
16 materials and policies.

17 The NOSB has always had wide  
18 support in the organic community. From 2002  
19 to 2012, the Policy and Procedures Manual,  
20 PPM, was developed by the NOSB with all  
21 revisions open to public comment. The  
22 transparent process helped citizens support

1 and trust the organic label.

2 That trust was wounded this past  
3 fall when the NOP unilaterally reversed the  
4 established Sunset process and undermined the  
5 independence of the Board. When public  
6 interest groups objected, the NOP simply  
7 decided that they would disband the policy  
8 subcommittee and implement the new edicts,  
9 despite objections from many organic  
10 stakeholders.

11 Cornucopia Board Member Barry  
12 Flamm, immediate past NOSB Chair and former  
13 Chair of the Policy Subcommittee stated,  
14 quote, throwing out the PPM is destroying  
15 decades of work with public involvement and  
16 makes the NOSB practically worthless, end  
17 quote.

18 It is the responsibility of the  
19 NOSB, not the NOP to determine Sunset review  
20 procedures. Mark Kastel submitted to you a  
21 letter signed by former NOSB Chair Barry Flamm  
22 and addressed to USDA Secretary Vilsack. The

1 letter is also signed by former NOSB Chairman  
2 Jim Riddle and Jeff Moyer. I trust you  
3 respect these gentlemen as much as I do and I  
4 hope the Secretary takes their concerns to  
5 heart.

6 Under OFPA, the NOSB provides  
7 advice on all aspects of organic regulations.  
8 We believe they are legally able to set their  
9 own work plan with priorities important to the  
10 organic community. Cornucopia Board Members  
11 have long been concerned about USDA's failure  
12 to act on priority issues, including EPA list  
13 for inerts, aquaculture standards, hydroponic  
14 standards, origin of livestock and others.

15 And the law requires the Secretary  
16 to set up a peer review panel for  
17 accreditation. Where is that panel? The law  
18 provides for the NOSB, not the NOP, to select  
19 contractors to perform technical reviews.  
20 Many of the current and past reviews are of  
21 substandard quality and exhibit tremendous  
22 bias and now the reviewers' identities are top

1 secret.

2 And I know this would be a game  
3 changer but the law gives the NOSB, not the  
4 USDA Secretary, the power and authority to  
5 hire the director of the NOP, Mr. McEvoy's  
6 position, if, as the law requires, the chief  
7 honcho at the NOP served at the pleasure of  
8 the Board, the entire program would become  
9 more accountable to the public.

10 Thank you to NOSB members for your  
11 hard work.

12 (Applause.)

13 CHAIR STONE: Thank you very much.  
14 Gerald Davis to the podium and Terry Gong on  
15 deck.

16 MR. DAVIS: Good morning. Gerald  
17 Davis, Research Agronomist for Grimmway Cal-  
18 Organic Farms in support of the continued use  
19 of sulfuric acid in organic production.

20 Grimmway Cal-Organic Farms is a  
21 California-based organic farm producing  
22 organic vegetables. Cal-Organic Farms began

1 in 1984 and became a part of Grimmway in 2001.  
2 Since I started with the farm in 1993, it has  
3 grown from 1,200 acres to 34,000 acres of  
4 certified organic. We are still a privately-  
5 owned LLC held by the Grimm family and we  
6 grow, pack, and ship most everything that we  
7 market.

8 One aspect of the fact that  
9 Grimmway Cal-Organic is a family-owned farm is  
10 that we operate our farm with practices that  
11 foster the improvement of long-term soil  
12 health. Every year, we grow thousands of  
13 acres of green manure crops and incorporate  
14 them back into the soil, along with natural  
15 rock minerals. Cal-Organic is now reaping the  
16 long-term benefits of those practices.

17 But we are here today to support a  
18 very important soil health topic that concerns  
19 this board. Like many farms in the western  
20 U.S., we own land that is alkaline in nature  
21 with irrigation water sources that tend to  
22 keep it that way without proper amendments.

1                   Previously, we relied on elemental  
2 sulfur applied to the soil, which was not very  
3 effective in lowering soil pH. This process  
4 was always hindered by the previously  
5 mentioned alkaline water supplies that tend to  
6 have high bicarbonate content. This  
7 bicarbonate in the water would convert to  
8 limestone when contacted our soils, which were  
9 already high in pH, making limestone addition  
10 an undesirable practice. We now own and  
11 operate 15 sulfur-burning machines that treat  
12 these type of water supplies with sulfurous  
13 acid, which effectively and safely dissolves  
14 the bicarbonate in the water, neutralizing it  
15 from becoming limestone. For a typical  
16 situation with our water supplies, we would be  
17 applying 500 to 600 pounds of limestone to  
18 every crop every year. This is detrimental,  
19 in our case.

20                   In my written comments I provided  
21 soil test data showing the benefits we have  
22 seen from the use of our sulfur burners.

1 These benefits include lower soil pH,  
2 declining limestone percentage, improved  
3 sodium balances in the soil. We try to be  
4 strategic on which areas we use the 15 sulfur  
5 burners we have at an average cost of \$25,000  
6 per unit and we do not intend to buy any more  
7 than necessary. The end result of using  
8 sulfurous acid is the sulfate ion. When we  
9 used to sulfur, soil sulfur, we had a lot  
10 higher sulfate ion excesses. We don't have  
11 that problem anymore.

12 My last comment. We would never  
13 purposely apply sulfate to our western soils  
14 because it is contained in many other things  
15 that we use like gypsum and potassium sulfate.  
16 So sulfur burners would never be used in  
17 western soils for a sulfate ion source.

18 Sulfurous acid is a very specific  
19 tool. It is very helpful to area region  
20 growers. It is not for everyone. It is not  
21 a nutrient supplier. It is a water treatment  
22 method that increases the sustainability of

1 area region agriculture very simply and  
2 effectively in a way that mimics what comes  
3 from rainfall that is mildly acidic already  
4 due to global volcanism.

5 If you have any questions --

6 CHAIR STONE: Thank you, sir.

7 Questions? Zea?

8 MEMBER SONNABEND: Of the crop mix  
9 that you grow vegetables, are some crops  
10 benefitting more by it and which crops would  
11 you tend to grow in the fields that you were  
12 able to treat the water with?

13 MR. DAVIS: It is beneficial to  
14 the blueberries that we grow, although it is  
15 a small acreage crop that we have but it is  
16 beneficial to that. It is beneficial to many  
17 of the crops that we grow. Specifically, we  
18 address the water supplies that are high in  
19 bicarbonate because those are detrimental to  
20 all our crops in varying degrees.

21 CHAIR STONE: Okay, thank you,  
22 sir. Thank you for being here.

1 (Applause.)

2 CHAIR STONE: Terry Gong to the  
3 podium and Andy Hudson on deck.

4 MR. GONG: Okay, my name is Terry  
5 Gong. I am with Harmon Systems,  
6 International. I am the original petitioner  
7 for the on-site generation of sulfurous acid  
8 for organic crop production and I am here to  
9 obviously urge that this material be continued  
10 on the approved materials list.

11 Okay. I am going to go -- I have  
12 a bunch of slides here but I am going to go  
13 through them very quickly. I just need about,  
14 well, hopefully, four minutes to do it all but  
15 I have some additional slides if there is any  
16 questions that it might help serve answering.

17 Okay, volcanism, nature's natural  
18 source of SO<sub>2</sub>. If you look at volcanism, when  
19 the oxidation of sulfur into SO<sub>2</sub> combined with  
20 water, it forms HOSO<sub>3</sub>, which splits apart  
21 immediately the hydrogen from the water and  
22 creates bisulfate. But bisulfate is an

1 interesting component because it feeds and  
2 reenergize chemoheterotrophic bacterias. In  
3 that process, it then causes the bisulfite to  
4 render its free remaining hydrogen and then  
5 turns to sulfate.

6 So, in that regard, the bisulfite  
7 isn't -- when we amend the water, we are not  
8 delivering a synthetic plant nutrient, as  
9 claimed by those who want to remove the  
10 sulfurous acid from the approved materials  
11 list. This is a microbial conversion of the  
12 bisulfate derived from the sulfurous acid into  
13 sulfate. It is quite natural.

14 Okay, if we look at volcanism  
15 again, we see that -- I know it is hard for  
16 the audience to see this but rainwater pH  
17 throughout the world is 5.6. It is not  
18 neutral. And this is, the chart there is  
19 basically from the EPA website and it shows  
20 5.6. Acid rain starts when it is below 5.6.

21 And also the other chart there  
22 showing, I have a circle around it, where we

1 are showing the comparison of ocean water  
2 alkalinity. There is some confusion or  
3 mystification in the scientific community  
4 about why the oceans may appear that they are  
5 acidifying. I contend that because 73 percent  
6 of the earth is covered by water and less than  
7 five percent of the ocean floor has been  
8 mapped, the mapping that we have found so far  
9 that there are millions of active volcanos  
10 underneath the ocean greater gradation and  
11 intensity than anything going on on the  
12 surface because the pH have been found in  
13 close proximity 1.0 pH and teaming with  
14 chemoheterotrophic bacteria organisms.

15 So, to continue, if volcanism  
16 ceased on this planet, we could go by the way  
17 of Mars, which we have never observed any  
18 volcanism and that is why we see what is  
19 hydrological activity and salt carbonates on  
20 that planet surface.

21 Now, with respect to rain, if  
22 rainwater is 5.6 and it falls heavily like

1 let's say the Eastern Seaboard, 80 to 90  
2 inches of rainfall, the soils are going to be  
3 acidic. The western soils, we don't receive  
4 that much rainfall. That is why our soils are  
5 still basic.

6 Now, with respect to acid rain,  
7 the problem with that is we are doing most of  
8 our coal burning in a region where the soils,  
9 the ecosystem have already lost their natural  
10 buffering capability. And so that is why it  
11 would be a problem.

12 The driver of these ecosystems?  
13 It is the free hydrogen proton and the  
14 bisulfate.

15 Wow. Okay, thank you.

16 CHAIR STONE: Do you teach it  
17 somewhere where we could take your class and  
18 learn some more?

19 (Laughter.)

20 MR. GONG: I am happy to give  
21 presentations to any organization that would  
22 be happy to listen. Tomorrow I am going to be

1 speaking to the Wastewater Treatment  
2 Conference in California.

3 CHAIR STONE: Thank you for being  
4 here sharing that with us. Questions?

5 Jean.

6 MEMBER RICHARDSON: Do you have a  
7 copy of your presentation in a hard paper  
8 version or could you email it to Ms.  
9 Arsenault?

10 MR. GONG: Yes, she already has a  
11 PDF copy of it.

12 MEMBER RICHARDSON: Thank you.

13 CHAIR STONE: Yes, thanks for  
14 asking that, Jean. Very good. Thank you for  
15 your time for being here.

16 And I think we are just going to  
17 keep running through to try to get caught up  
18 a little bit before lunch. So, you should  
19 take a break, kind of look and --

20 So, I have got Andy Hudson to the  
21 podium and Dragan Macura on deck.

22 DR. HUDSON: Good morning. I am

1 Dr. Andy Hudson, Senior Research Scientist at  
2 Westbridge Agricultural Products. First,  
3 Westbridge would like to thank the NOSB for  
4 the opportunity to discuss issues related to  
5 the proposed extension of streptomycin.

6 Westbridge introduced an organic  
7 BioControl, Blossom Protect for the control of  
8 fire blight, upon receiving EPA registration  
9 in 2012. This was followed by California  
10 registration in 2013. Prior to the EPA  
11 registration, there were four years of  
12 university trials from 2008 to 2011 in which  
13 Blossom Protect showed consistent, reliable  
14 control.

15 Westbridge would like to make  
16 clear that it is not taking a position on  
17 extending the deadline for streptomycin use in  
18 organic orchards. We believe there are  
19 compelling arguments by proponents for both  
20 sides and we trust that the decision will be  
21 made in the best interest of the organic  
22 community. However, there are several

1 organically-approved options for fire blight  
2 control. Blossom Protect is one of the most  
3 efficacious materials in combatting fire  
4 blight, whether used as a stand-alone  
5 application or as part of an integrated pest  
6 management program.

7 Blossom Protect was first  
8 developed and introduced in Europe. The  
9 active ingredients are two proprietary strains  
10 of a yeast-like fungus named Aureobasidium  
11 pullulans, a naturally occurring epiphyte  
12 found in hung fruit orchards. It is safe for  
13 bees and beneficial insects.

14 Blossom Protect is a preventative  
15 biocontrol product, which requires full  
16 applications prior to the first infection.  
17 Blossom Protect is always used in combination  
18 with Buffer Protect.

19 In over six years of testing in  
20 inoculated trials in the Pacific Northwest on  
21 pome fruit, Blossom Protect has consistently  
22 yielded results at a level comparable to

1 antibiotics. These trials were conducted at  
2 major universities by various respected fire  
3 blight researchers.

4 I would like to point out that the  
5 bars on the graph are proportional to the  
6 infection. Therefore, the smaller bars  
7 indicate superior control. Also, these  
8 represent multiple years with variable  
9 conditions in each year. Yet, consistent  
10 control is achieved. I would just like to  
11 point out that -- let me see if this pointer  
12 works. Is there a pointer?

13 I just want to point out that the  
14 control or the untreated are the red bars, the  
15 antibiotic are the yellow bars, and Blossom  
16 Protect is the green bars. In a number of  
17 years, Blossom Protect performed superior to  
18 the antibiotic.

19 Applications should be made for  
20 the duration of the primary bloom cycle, when  
21 possible. Multiple applications are crucial  
22 in colonizing flowers that have emerged since

1 a previous application. Early applications  
2 help to build the population levels, while  
3 applications made later in the bloom cycle  
4 will help to ensure that all susceptible  
5 tissue has been treated. These late  
6 applications can be very critical but  
7 applications made after petal fall are  
8 restricted and off-label.

9 Most biopesticides with a living  
10 active ingredient such as Blossom Protect will  
11 have some constraints, compared to traditional  
12 chemistries. In summary, with its  
13 demonstrated efficacy, organic approval, and  
14 pollinator and worker safety, Blossom Protect  
15 represents a valuable tool to combat fire  
16 blight.

17 I am here with Tina Koenemann,  
18 President of Westbridge and Dr. Larry Parker,  
19 Director of Research and Development. We are  
20 available for more information or discussions,  
21 if desired. Thank you.

22 CHAIR STONE: Thank you, sir.

1 Harold?

2 MEMBER AUSTIN: Thank you. One  
3 question for you. Your comment was that the  
4 Blossom Protect efficacy-wise, was comparable  
5 to that of the antibiotics. But yet,  
6 application would be off-label post-bloom.  
7 Whereas, fire blight doesn't just affect trees  
8 at bloom time. What would be the efficacy or  
9 what would we use to control if we were not to  
10 have antibiotics post-bloom for tip light or  
11 say we had a crop that got hail injury?

12 DR. HUDSON: That would be the one  
13 the situation in which Blossom Protect would  
14 not be able to fill the gap.

15 CHAIR STONE: Zea?

16 MEMBER SONNABEND: Thank you. And  
17 thank you for bringing us some alternative  
18 materials to use. But I would like to know  
19 what your research results may be in the  
20 Central Valley and Delta of California on  
21 pears, where the conditions are very warm and  
22 humid in the winter, relative to the Pacific

1 Northwest where your research has been  
2 conducted.

3 DR. HUDSON: We have done trials  
4 in California on pear and it has worked fairly  
5 well on pear without a problem. The biggest  
6 problem with pear that I have seen is that it  
7 does have a tendency towards a more protracted  
8 bloom. And so when you get out -- you know  
9 there is a lot more secondary bloom or rat  
10 tail. So, that is, I think, the biggest issue  
11 on treating the pear. It actually is more  
12 efficacious on pear when it is applied in the  
13 bloom cycle and there is a restricted bloom.  
14 It does work very well on pear.

15 The issue with pear is the  
16 extended secondary bloom, especially on some  
17 cultivars. This product will definitely work  
18 better in a typical bloom year, where it is  
19 more constrained in duration. Thank you.

20 CHAIR STONE: Thank you. Oh,  
21 Francis.

22 MEMBER THICKE: The data you show,

1 did you use Blossom Protect beyond the bloom  
2 period in those charts or only until the  
3 bloom?

4 DR. HUDSON: No, sir. Those were  
5 only during the bloom period that those  
6 applications were made.

7 MEMBER THICKE: Okay.

8 DR. HUDSON: A number of them will  
9 have some thinning treatments done prior,  
10 early in the bloom. A lot of times in Pacific  
11 Northwest they use fish oil with lime sulfur  
12 to thin and then Blossom Protect, a couple of  
13 applications during the bloom cycle.

14 MEMBER THICKE: Okay, a follow-up.  
15 We have heard some rumors that it hasn't  
16 worked in some cases. Would you comment on  
17 that what might be the reason? Was it not  
18 used properly?

19 DR. HUDSON: I would like to know  
20 a little more information on those rumors or  
21 reports because I run the field trials and I  
22 haven't received those indications. The only

1 indications I have seen that I would say are  
2 a little questionable would be when there is  
3 no fire blight pressure to begin with. And  
4 then how do you control -- how do you say  
5 whether you got control if there wasn't  
6 pressure to begin with due to the  
7 environmental conditions that year. But I  
8 haven't specifically seen where there have  
9 been issues in it not performing when it has  
10 been applied during the bloom cycle.

11 CHAIR STONE: Thank you very much.  
12 And as Zea said, thank you for your work and  
13 thank you for being here.

14 DR. HUDSON: Thank you.

15 (Applause.)

16 CHAIR STONE: Dragan to the podium  
17 and Nate Lewis on deck.

18 MR. MACURA: Thank you. My name  
19 is Dragan Macura and I am the founder and the  
20 chief science officer of AgroThrive,  
21 Incorporated. A lot of you probably remember  
22 me from being in the eye of the storm on the

1 discussions about corn steep liquor. And I am  
2 here today to talk about organic fertilizers  
3 in general. I have a comment on the vinasse  
4 and I also have a suggestion as to how to deal  
5 with the residual concentrations of  
6 objectionable materials in raw materials for  
7 fertilizers.

8 So, organic fertilizers are, as we  
9 probably know but haven't thought about it too  
10 much, foundational or everything organic.

11 Everything we eat or use in organic industry  
12 has either been fertilized or has been fed on  
13 something that has been fertilized at some  
14 point in time.

15 So, organic fertilizers are at the  
16 bottom of the pyramid of our whole system and  
17 we should always keep that in mind when we are  
18 making decisions on whether to include or  
19 exclude any raw materials for organic  
20 fertilizers. We already are in very short  
21 supply of raw materials for organic  
22 fertilizers and with increased tendency to

1       exclude raw materials because they have  
2       objectionable residuals, it is increasingly  
3       worrisome that our whole industry has no basis  
4       upon which to grow. And we have heard many  
5       groups and many people talk about wanting to  
6       protect organic integrity and also increase or  
7       grow organic industry but always looking at  
8       ways to eliminate raw materials for organic  
9       fertilizers.

10                       And so with that, I would like to  
11       suggest that when there is a question on the  
12       table whether to include or exclude the  
13       material, please remember that rules that have  
14       been made for organic industry, for food  
15       industry, have usually been made on the basis  
16       of the materials for human consumption. These  
17       are fertilizers. Fertilizers have to be  
18       processed in some way before they get into  
19       soil. Soil itself has enormous microbial  
20       activity and ability to degrade, to digest,  
21       and to neutralize a lot of objectionable  
22       materials.

1                   One of the processes, our process,  
2                   for example, that we use is on progressive  
3                   digestion process. And I just want to show  
4                   you a bunch of slides that will demonstrate  
5                   how we degrade very objectionable and in fact  
6                   probably environmentally dangerous materials  
7                   to very useful fertilizers that are done in  
8                   about three times, rather than in long, long  
9                   time, six weeks to six months, maybe years in  
10                  the environment.

11                  So, we start with very  
12                  objectionable, environmentally objectionable,  
13                  and also dangerous material on the pathogenic,  
14                  on the microbial point of view, et cetera.

15                  Fish, for example, fish waste. We  
16                  take fish waste. We grind it, a bunch of  
17                  grinding processes and yes, we add it to corn  
18                  steep liquor in this case. We can use other  
19                  materials that will liquefy the process. Then  
20                  we take it through a bunch of digestion tanks.  
21                  We have primary digestion, secondary  
22                  digestion, and in three weeks we turn it into

1 liquid portion which is our product and then  
2 a solid portion which has been heat-treated,  
3 highly digested, very safe, very good  
4 nutrients for soil, et cetera. These are the  
5 microbes that end up as champions of that  
6 process. Very beneficial to soil. Very safe  
7 in the environmental terms.

8           So, this system can be used if you  
9 want to challenge the material with, for  
10 example, antibiotics, or any other materials  
11 that are objectionable in fertilizers as raw  
12 inputs. And if these materials are not  
13 degraded or otherwise digested, then we should  
14 restrict them. Otherwise, then they have gone  
15 through a process like this, they should be  
16 allowed to be used as raw materials.

17           Thank you. I'm sorry about  
18 running over.

19           CHAIR STONE: All right. Thank  
20 you, sir. Thanks for being here.

21           Nate Lewis to the podium and  
22 Rebecca Thistlewaite on deck.

1                   MR. LEWIS: Good morning. I am  
2 Nate Lewis with Organic Trade Association. I  
3 am the Senior Crops and Livestock Specialist.  
4 OTA represents over 6,500 businesses engaged  
5 in the organic industry across 49 states and  
6 I am happy to be here to address some of the  
7 items on the agenda at this meeting.

8                   OTA supports sound, pragmatic, and  
9 consistent evaluation of National List  
10 materials. This is why we support tabling the  
11 recommendations on aquaculture. This is why  
12 we support the petition annotation change for  
13 the listing in methionine in poultry rations  
14 as passed by the Livestock Subcommittee. And  
15 this is also why we caution against the  
16 selective use of annotations redundant to  
17 practice standards and OFPA provisions.

18                   Proposed standards for aquaculture  
19 are long overdue. We understand the desire to  
20 usher along the implementation of these  
21 standards by prioritizing the review of  
22 petitioned aquaculture materials. However, we

1 recommend the board table the aquaculture  
2 materials recommendations until a production  
3 standard is released.

4 Sound assessment of National List  
5 materials role in a practice standard is  
6 critical to determining essentiality.

7 On methionine, our poultry  
8 producing membership represents a wide range  
9 of operations covering the entire United  
10 States from smaller operations with pasture-  
11 based approach to larger operations with  
12 nationally distributed labels. Reports from  
13 all sizes of operations indicate that the  
14 step-down of allowed methionine in organic  
15 feed has resulted in an increase in animal  
16 welfare issues, like feather-pulling and  
17 cannibalism.

18 The petitioners request that  
19 methionine levels be averaged over the  
20 lifetime of the animal, much like how dry  
21 matter intake is calculated for ruminant  
22 animals over the course of the grazing season.

1 This pragmatic approach would satisfy one of  
2 the basic tenants of preventative livestock  
3 healthcare, which is to provide feed rations  
4 sufficient to meet nutritional requirements.  
5 It also resulted in no increase in the use of  
6 synthetic substances on the National List. We  
7 urge the Board to accept the recommendation of  
8 the subcommittee and allow organic poultry  
9 producers to provide rations adaptable to the  
10 changing demands of their flocks.

11 In regards to an overall comment  
12 on NOSB's material review process, applying  
13 annotations redundant to practice standards  
14 and OFPA provisions are a result of political  
15 compromises, a vote of no confidence in  
16 current practice standards.

17 Once in a while you get shown the  
18 light in the strangest of places, if you look  
19 at it right. But forcing farmers and handlers  
20 defend the light or defend their production  
21 system with the selective use of annotations  
22 and materials shifts the perception of organic

1 from one of an integrated process-based  
2 standard, to one of input substitution.  
3 Shifting this perspective does not foster  
4 confidence in the consistent application of  
5 the organic standards in OFPA.

6 Consistency in how the Board the  
7 reviews, renews, and repeals substances on a  
8 National List can also reduce NOP's rulemaking  
9 burden. Freeing up resources at NOP will  
10 enable them to act on long-awaited practice  
11 standard recommendations like origin of  
12 livestock and animal welfare.

13 We also believe that consistency  
14 in the Board's material review is essential to  
15 attracting additional farmers to organic  
16 practices, expanding organic acreage, and in  
17 continuing to grow the organic sector.

18 Please table the recommendations  
19 of aquaculture materials, allow organic  
20 poultry producers to adapt feed rations, to  
21 changing nutritional demands, and maintain  
22 consistency in National List material review.

1 Thanks.

2 CHAIR STONE: Thank you, Nate.  
3 Jean?

4 MEMBER RICHARDSON: Hi, Nate.  
5 Just one quick question. Have you done any  
6 kind of a survey of your poultry producers to  
7 see if all sizes of producing facilities are  
8 using methionine from the very small to the  
9 very large in your system?

10 MR. LEWIS: Well, you are going to  
11 hear from a number of members that represent  
12 that full range of skills of operations in  
13 public comment coming up. So, I am going to  
14 let them talk about the specifics there.

15 CHAIR STONE: Jay?

16 MEMBER FELDMAN: Thank you for  
17 your statement. Can you give us a little more  
18 detail on how the streamlining will free up  
19 resources? If I understood you correctly, you  
20 were saying that the review process, the new  
21 review process will free up resources so that  
22 the Program can do other things.

1 MR. LEWIS: Well, we are just  
2 responding to the statement NOP released when  
3 it issued its new Sunset.

4 MEMBER FELDMAN: So, you don't  
5 have an independent assessment of that  
6 statement?

7 MR. LEWIS: No, we usually trust  
8 the NOP to gauge its ability to enact  
9 rulemaking.

10 MEMBER FELDMAN: Okay.

11 CHAIR STONE: Thank you, Nate.

12 (Applause.)

13 CHAIR STONE: Rebecca Thistlewaite  
14 to the podium and Ernie Peterson on deck.

15 MS. THISTLEWAITE: Hello and good  
16 morning. My name is Rebecca Thistlewaite and  
17 I am from Hood River, Oregon.

18 I was recently hired as a policy  
19 analyst for the Cornucopia Institute with a  
20 specialty in livestock policy. I am also a  
21 small-scale vegetable a livestock farmer. And  
22 I previously owned a certified organic

1 livestock and poultry farm in California. And  
2 so I know firsthand about poultry production.

3 I am speaking today on the subject  
4 of synthetic methionine. I know this is a  
5 controversial synthetic amino acid and I, too,  
6 have wavered on my stance as I learn more  
7 about it and I talk to other producers and  
8 feed mills.

9 The Cornucopia supports the  
10 livestock subcommittee proposal to amend the  
11 current language on synthetic methionine to  
12 include changing -- allowing producers to  
13 average the inclusion rates over the life of  
14 the flock. So, two pounds for layers and  
15 broilers and three pounds for turkeys and  
16 other poultry.

17 I know some other NGOs don't  
18 support this amendment but because of input  
19 from our strong constituency of organic farmer  
20 members, the Cornucopia Institute perceives  
21 the need for a more measured response to the  
22 issue of methionine use.

1                   We understand that the current  
2                   step-down amounts have led to poultry health  
3                   issues, longer grow out times and reduced egg  
4                   production. We can't just phase out synthetic  
5                   methionine without considering the management  
6                   practices of modern day organic poultry.

7                   The bigger issues is the very  
8                   restricted diet of corn and soy that most  
9                   organic poultry have to obtain all their  
10                  essential amino acids and also the lack of  
11                  meaningful outdoor access. Yes, there are  
12                  alternative feedstuffs that can be added into  
13                  poultry rations to increase methionine rates.  
14                  That is good and diets should be more diverse.  
15                  But truly getting the birds out on quality  
16                  pasture, eating bugs, warms, and vegetation  
17                  can actually satisfy the vast majority of  
18                  methionine needs.

19                  The problem is two-fold, though.  
20                  U.S. Organic Poultry does not have meaningful  
21                  outdoor access and stocking densities are too  
22                  high for the birds to obtain much nutrition if

1 they do get to go outdoors. European Union  
2 organic rules require that organic laying hens  
3 and broilers have at least 43 square feet of  
4 outdoor space per bird. The NOP is  
5 considering animal welfare standards that  
6 would only include two square feet of outdoor  
7 space per bird. So, clearly, there is a  
8 difference in what the European Union model is  
9 and what we are suggesting in the United  
10 States.

11 Forty-three square feet per bird  
12 actually is equivalent to only a thousand  
13 birds per acre. The NOP has basically  
14 abdicated their responsibility in enforcing  
15 the animal welfare aspects of the organic  
16 regulations.

17 Let's get our organic poultry  
18 outside on a pasture eating diverse diets and  
19 generally accommodating the health and natural  
20 behaviors of the birds as OFPA states and as  
21 required under organic regulations. Then, it  
22 will be much easier to address the nutritional

1 needs for methionine with natural supplements.

2 If the Livestock Subcommittee  
3 amendment does pass, we also ask that the NOSB  
4 pass a resolution stating their commitment to  
5 aggressive research into alternatives to  
6 synthetic methionine, as well as a commitment  
7 to a true Sunset in 2019.

8 Thank you for allowing me to  
9 present testimony. I would be happy to take  
10 any questions now.

11 CHAIR STONE: Thank you very much,  
12 Rebecca. Ernie -- I'm sorry. Zea.

13 MEMBER SONNABEND: Thank you,  
14 Rebecca.

15 Has your investigation into the  
16 methionine and its alternatives turned up how  
17 feasible it is the suggestion that was given  
18 by a couple of other commenters about the  
19 Black Soldier worms and whether this can soon,  
20 if not right now, become a viable alternative  
21 addition to feed for methionine?

22 MS. THISTLEWAITE: Sure. Yes, I

1 did do quite a bit of research in Black  
2 Soldier fly meal. It does look like it has a  
3 lot of potential not only for methionine but  
4 also to address protein needs for poultry.  
5 However, the FDA has not approved it yet in  
6 poultry feed. I did contact a manufacturer  
7 who is commercializing it and they have got it  
8 approved for shrimp production but they think  
9 it is going to take another three to five  
10 years before FDA approves it for poultry.

11 So, it does look like it is a  
12 viable alternative but we are not there yet.

13 CHAIR STONE: Okay. Jay.

14 MEMBER FELDMAN: Okay. If I  
15 understand it correctly, methionine or others  
16 is being used as an animal welfare tool. Is  
17 that correct? And if so, how can we be  
18 assured that we will get to an actual Sunset  
19 in 2019 or whenever it is?

20 MS. THISTLEWAITE: Well, it is an  
21 essential amino acid, essential for poultry  
22 growth. So, if you take it away from them

1 without providing alternatives, it does turn  
2 into an animal welfare problem because it  
3 increases feather pecking and there is a range  
4 of other health issues.

5 I am on a Listserv of the American  
6 Pastured Poultry Producers Association and  
7 there is 600 members. I asked people what  
8 they were seeing as a result of the step-down  
9 and even pastured producers were seeing health  
10 problems in their flocks.

11 So, it does turn it into an animal  
12 welfare issue when you just turn it off.

13 What was your second questions?

14 MEMBER FELDMAN: Well, how do we  
15 get to the Sunset then, if we are not adopting  
16 actual animal welfare standards as you  
17 describe? I don't see how we get to that  
18 Sunset that you advised the Board that we  
19 should get to.

20 MS. THISTLEWAITE: Yes, the  
21 Cornucopia does support the animal welfare  
22 standards that were developed for poultry a

1 couple years ago. I would say that they are  
2 very baseline. I think we actually need to do  
3 much more than those standards. So, we would  
4 encourage the NOP to make some movement on  
5 that, while sticking to a sunset data of 2019  
6 for methionine. I think if those two things  
7 go hand-in-hand, we will get to the place  
8 where we need to be.

9 CHAIR STONE: Thank you. Oh,  
10 Nick?

11 MEMBER MARAVELL: Yes, I was  
12 wondering if you could comment on the other --  
13 you indicated there were a variety of sources  
14 for methionine. Could you comment on the  
15 other sources of methionine that are not  
16 facing any regulatory barriers that are  
17 currently available to poultry producers? And  
18 specifically, what would be the cost  
19 implication? Would they cost more, cost less,  
20 of including those in a poultry ration?

21 MS. THISTLEWAITE: Yes, sure.  
22 There are some great alternatives. Dried whey

1 is one that is commercially available and in  
2 an organic form. But a lot of the  
3 alternatives are not available in an organic  
4 form, such as corn gluten meal or potato meal.  
5 There is just not any production of it.

6 Some of the other alternatives  
7 include fish meal, which there is serious  
8 sustainability issues around fish meal. Crab  
9 meal can be great but it is usually preserved  
10 with a synthetic called ethoxyquin, which we  
11 can't use. Some impart bad flavors, like flax  
12 meal. If you give more than five percent flax  
13 meal, you are going to have fishy eggs. Some  
14 of low digestibility. So, even if they have  
15 high MET, they are not in a digestible form.  
16 And then some aren't approved yet, like I  
17 mentioned with the Black Soldier fly meal.

18 So, feed mills are using  
19 alternatives right now because they are only  
20 allowed to use two pounds per ton. But birds  
21 actually need more like I think with layers  
22 they actually need like 0.37 percent. So,

1 they are using natural sources already to  
2 supply that additional methionine. So, things  
3 like canola meal, sunflower meal, some crab  
4 meal that is naturally preserved. So, they  
5 are using some of those alternatives.

6 A couple of the feed mills that I  
7 interviewed when doing this research said that  
8 if the biggest vertically-integrated egg  
9 operations in the country started using these  
10 alternative methionine inputs, they would take  
11 up the entire supply that is available and  
12 there wouldn't be any left for smaller  
13 producers.

14 Now, of course that may stimulate  
15 new production but there is always a lag  
16 between demand and supply.

17 MEMBER MARAVELL: What is the  
18 applicability of using organic alfalfa as a  
19 supplement as well?

20 MS. THISTLEWAITE: Yes, alfalfa  
21 meal does provide some methionine in small  
22 quantities but whenever you are making a

1 poultry ration, even if something has  
2 methionine, it is all about balancing all  
3 these different nutrients and anti-nutrients,  
4 too. So, I don't know enough about alfalfa in  
5 particular.

6 CHAIR STONE: Thank you very much,  
7 Rebecca.

8 MS. THISTLEWAITE: Thanks.

9 CHAIR STONE: Thank you for your  
10 work. Ernie Peterson to the podium and Chris  
11 Pierce on deck.

12 MR. PETERSON: Good morning. I'm  
13 going to use up my time just getting the mike  
14 adjusted. Well, you can wait. We'll be done  
15 by lunch.

16 Good morning, again. I am Ernie  
17 Peterson, Cashton, Wisconsin. We have Cashton  
18 Farm Supply, CFS Specialty in the soy press  
19 facility to Brodhead called Super Soy. We  
20 have been certified organic since 1996.

21 My positions as a feed  
22 nutritionist and feed manufacturer, we are

1 presently feeding somewhere around 190 to 200  
2 organic layers. Most of these are smaller  
3 flocks from 2,500 birds, lots than 2,500 to  
4 5,000 bird barns, up to 20,000 bird barns.

5 Thank you guys for addressing this  
6 issue. You have been fighting with it for a  
7 while and it needs some change.

8 I am here to support the life of  
9 the flock, rather than the two pounds per ton,  
10 and there are four points I really want to  
11 address, the science, the humane treatment of  
12 the chickens, it is not fair by region, the  
13 present formula we have, and the environmental  
14 concerns.

15 The science. That has been  
16 addressed and studies continue and we will  
17 hear more about that.

18 The humane treatment of the birds.  
19 We all know and we see it in these small  
20 barns, when a bird or a layer is short of a  
21 feeding ingredient, they will find the  
22 ingredient. We call it feather pecking. For

1 the most part, they want to eat flesh to get  
2 the methionine and it is cannibalism. So,  
3 that is what we are seeing in what we refer to  
4 the humane. It is the feather pecking but  
5 mainly the eating of flesh to satisfy their  
6 need for methionine.

7 The other point that I want to  
8 make and that becomes is temperature, its  
9 fairness to make a level playing field. We  
10 ship feed into Canada and we also ship a  
11 decent amount of feed into Texas. In the  
12 north in Wisconsin, our birds are regularly  
13 eating 25 to 30 pounds of feed for every 100  
14 birds. Once we move into this Arkansas/Texas  
15 area, 18 to 24 pounds becomes the maximum.  
16 The advantage in the north we have is those  
17 birds with two pounds per ton are  
18 automatically consuming about 20 percent more  
19 methionine just because of where they live.  
20 The problem I have is that doesn't make a fair  
21 playing field for an organic producer. If you  
22 live in the north, cooler temperature, you

1 have an advantage with the rule.

2           The environmental concerns. Two  
3 pounds per ton versus the life of the flock  
4 forces us to use more protein in the early  
5 stages of production. We have the ammonia  
6 issues in the house, both for the people and  
7 the birds that causes or forces us to spread  
8 more nitrogen on the field, which ends up in  
9 the water. The extra protein also forces more  
10 beans to be growing and, at this point, with  
11 the lack of acreage that we have, it is the  
12 imports that we have the emphasis on.

13           Once again, the four points that I  
14 think are important to me are the science, the  
15 humane treatment of birds, it is not a fair  
16 playing field right now, and what we are doing  
17 by the environment by forcing more free  
18 nitrogen out there.

19           I want to thank you for your time  
20 and urge you to change the rulings for the  
21 life of the flock. Thank you.

22           CHAIR STONE: Thank you, Ernie.

1 Francis?

2 MR. PETERSON: Yes.

3 MEMBER THICKE: Thank you, Ernie.

4 Have you had any experience with the high  
5 methionine corn? I know it was developed or  
6 worked on in Wisconsin. Have you grown it?

7 MR. PETERSON: We have grown it.

8 The early high methionine was a waxy corn.  
9 And that certainly did not have the yield,  
10 probably about the half the yield of  
11 conventional. I have met with Walter  
12 Goldstein. That was last week. They have a  
13 new genetic out. They have some investors  
14 that were up from Chicago.

15 Presently, they have enough corn  
16 seed for about 200 acres this year. They are  
17 looking for investors. It is not going to  
18 take away the methionine. They are changing  
19 methionine level in corn from a 0.015 to a  
20 0.025 to a 0.03. That is going to allow us a  
21 full corn diet, corn-soy ration to get rid of  
22 about a quarter pound of methionine per ton.

1                   So, it will help but even the new  
2 genetics they have of the corn is not going to  
3 solve it.

4                   We mentioned alfalfa. We use  
5 alfalfa. Most rations for xanthophyll, for  
6 the egg yolk color and to try and pick up the  
7 methionine. Obviously, they need some  
8 practice to try and get as close as we can.

9                   I'm sorry, I didn't mean to go on  
10 but I hope I answered your questions.

11                  CHAIR STONE: And there are going  
12 to be, looking at the list, there is like six  
13 or seven more presenters on methionine coming  
14 up behind here. So, thank you very much.

15                  MR. PETERSON: If I could make one  
16 quick comment is in the late lay stage, we  
17 have adequate methionine under where we are at  
18 now. It is these bringing the birds into lay  
19 and when the birds are laying at high  
20 production, in growing this stuff.

21                  So, thank you for your time.

22                  CHAIR STONE: Thank you, very

1 much.

2 (Applause.)

3 CHAIR STONE: Chris Pierce to the  
4 podium and Melvin Gaimain on deck.

5 MR. PIERCE: Good morning ladies  
6 and gentlemen of the National Organic  
7 Standards Board, our friends from the NOP and  
8 all of those sitting in the audience this  
9 morning. My name is Chris Pierce. I am from  
10 Annville, Pennsylvania, which is south-central  
11 Pennsylvania. We live just a few miles from  
12 the sweetest place on earth, Hershey,  
13 Pennsylvania.

14 I have shared before with this  
15 Board and again, I thank you. And I am going  
16 to go quick. You are the most involved  
17 voluntary board of anything I have ever seen  
18 in my life and I thank you for your sincere  
19 dedication.

20 I am here to talk a little bit  
21 about specifically methionine and I am going  
22 to touch on animal welfare.

1                   The company I am with is Heritage  
2 Poultry Management Services. We are a  
3 management company. We have been involved in  
4 organic production since 1997. Today, we work  
5 with over 100 small family farms that are  
6 producing non-caged eggs. Around 60 of those  
7 small family farms are certified organic and  
8 that is why I am here today.

9                   I am the face of the small family  
10 farms from south-central Pennsylvania that  
11 aren't able to be here today in beautiful  
12 Texas. And I carry that burden to share their  
13 successes and their concerns with you.

14                  As I think about our small family  
15 farmer, he is probably 35 -- he or she. We  
16 have a good amount of female poultry farmers,  
17 too. Our average age is around 35 years of  
18 age, compared to USDA's 58 years of age. So,  
19 the organic opportunity has breathed fresh air  
20 of new opportunity for farmers. And our  
21 farming community in our nation is shrinking,  
22 not growing. Within the segment of organic,

1 it is growing and we are thankful for that.

2 So, as I think about those, we at  
3 Heritage and the 60 organic family farmers  
4 that I represent range in farm sizes from  
5 4,000 hens up to around 20,000 bird barns of  
6 two on a farm, so they could have up to 40,000  
7 birds on the farm.

8 We are in support of the  
9 Livestock's Committee's motion that the  
10 Subcommittee has approved a methionine use  
11 changing from two pound per ton to a two pound  
12 over the life of a flock.

13 From the experiences we have seen,  
14 we have seen -- we are very data driven. All  
15 of our farmers give us a weekly breakdown of  
16 livability and feed consumption and water  
17 consumption and egg production. And we have  
18 our service technicians visit the farms on a  
19 weekly basis to hold the hand of the farmer to  
20 help them succeed with complying with the food  
21 safety, animal welfare, the organic  
22 certifications, all these details. Our

1 service people and our company is there to  
2 help the farm succeed.

3 We have, as Mr. Peterson, just  
4 said, seen a significant increase in mortality  
5 due to the decreased level of methionine. We,  
6 too, are formulating sunflower meal, canola  
7 meal, alfalfa, many of the ingredients that  
8 were talked about earlier in addition to our  
9 corn and soy diet. And that is just to try to  
10 balance out to utilize what we can.

11 This does tie into animal welfare  
12 and I would like to strongly encourage the NOP  
13 to take the actions that this Board had passed  
14 in December of 2011 and support that the  
15 consumers are getting the eggs that they  
16 believe organic stands for, in addition to the  
17 grain source that organic hens are fed, it is  
18 the welfare standards, as well as the types of  
19 farms that are producing those eggs.

20 We support the two square foot  
21 minimum standard that was set for outdoor  
22 access and allow farmers to put more in place,

1 if they choose to do so. We understand many  
2 retailers around the country that are  
3 featuring and selling organic eggs, they, too,  
4 are starting to take their own position  
5 because of the NOP taking regulatory  
6 positions, retailers such as Whole Foods and  
7 many others are looking at how do they  
8 standardize and create standards that the NOP  
9 is not going to, because they see the value of  
10 helping consumers understand that there is  
11 value to clarifying the unknown. And I want  
12 to strongly encourage that.

13 So, as I think about the  
14 successes, I would like to go back to say  
15 there is many small family farms that can  
16 invest 30, 40, 50 million dollars in a venture  
17 that can put in a half a million, a million,  
18 which is a lifetime's worth of money for all  
19 of us here, but they can invest that into  
20 developing egg farms -- I'm done -- egg farms  
21 to meet consumers' expectations. And  
22 consumers' expectations are welfare and also

1 the types of outdoor access that are  
2 encouraged.

3 So, thank you to the Board for  
4 allowing me to share my comments.

5 MEMBER THICKE: Can I ask a quick  
6 question?

7 CHAIR STONE: Thank you, Chris.  
8 Francis.

9 MEMBER THICKE: You said that the  
10 chickens are cage free. Can you describe what  
11 kind of access to the outdoors they have?

12 MR. PIERCE: Sure. So, we work  
13 with -- we don't discriminate whether they are  
14 organic or fed conventional feeds that are  
15 non-caged. So, the outdoor access of all the  
16 organic egg farms, we have transitioned.  
17 Because before, as we know, there was no  
18 definition of outdoor access. Even as it  
19 stands today, it can be this little atrium  
20 area could be enough for 30,000 chickens. And  
21 as we sit here and think there is no way that  
22 could be 30,000, we have transitioned into our

1 company having a minimum of two square foot  
2 per bird. And I would say they were probably  
3 around 70 percent compliant because you have  
4 to think about it.

5 So before, if you had a half a  
6 foot a bird, let's be realistic, if you had a  
7 half a foot a bird before and you need to  
8 expand to two foot or more, you also have to  
9 make sure that the ground you are expanding to  
10 meets the 36 months without any prohibitive  
11 materials. So, for many farmers across the  
12 United States, we do have buffer zones but if  
13 we exceed where that buffer zone is, we need  
14 to allow time for our farmers to follow  
15 organic standards on that additional land.  
16 So, it could be another year until all of our  
17 farms will be able to be at that minimum to  
18 two square foot.

19 And I know the NOP, as they pass  
20 guidelines, they do give a time line in which  
21 farms can adapt to meet the new standards.  
22 And we are just pleading with the NOP to come

1 up with some proposed rules so we can get to  
2 final rules and move forward with this.

3 CHAIR STONE: Jennifer?

4 MEMBER TAYLOR: Thank you for your  
5 presentation.

6 MR. PIERCE: Sure.

7 MEMBER TAYLOR: I would like to  
8 know if you are aware of any existing  
9 scenarios where methionine would not be  
10 necessary.

11 MR. PIERCE: That is a good  
12 question. Some people are saying if the birds  
13 weren't on a corn and soy diet, if they were  
14 all living outside, and again, I am not an  
15 expert, the next speaker is my father-in-law,  
16 so I trust my father-in-law. He has a little  
17 bit more knowledge and experience on  
18 nutrition. So, I am not aware of any. And  
19 even as has been shared by Cornucopia and  
20 Ernie earlier, I am not aware of any flocks  
21 that are able to -- that are producing eggs  
22 without some level of a synthetic methionine.

1 Even as we look at Europe and we talk about  
2 Europe, we tout Europe, remember there are 95  
3 percent rules. They have a five percent non-  
4 organic allowance. So, there are some other  
5 things -- long answer: no.

6 CHAIR STONE: Great. Thank you,  
7 very much.

8 MR. PIERCE: Thank you.

9 CHAIR STONE: Mr. Father-in-Law to  
10 the podium and Randy Mitchell on deck.

11 (Laughter.)

12 MR. GAIMAN: Greetings to the NOSB  
13 and the NOP. I want to thank the Standards  
14 Board for volunteering your time and  
15 understanding how the standards affect real  
16 people. I want to talk about methionine and  
17 animal welfare.

18 My name is Mel Gaiman. I am the  
19 founder of Heritage Poultry Management  
20 Services and past president. Heritage was  
21 founded in poultry management services in 1980  
22 and I served on the five-year term on the

1 Pennsylvania Certified Organic Board. And my  
2 interest has been in providing best husbandry  
3 to hens and to produce the best products for  
4 the consumer.

5 Pennsylvania has about two million  
6 hens that meet the present outdoor access  
7 provisions. And our company has been  
8 certified in organic egg production since 1998  
9 and involved in at least 50 percent of  
10 Pennsylvania organic egg production on family  
11 farms. From the beginning, our goal is to be  
12 transparent and to anticipate consumer  
13 expectations in organic eggs. Each of our  
14 organic egg layer houses has approximately  
15 \$18,000 hens with two square foot outdoor  
16 access, which Chris had mentioned.

17 We do have -- have had searched  
18 for feedstuffs and anticipated -- to  
19 anticipate all natural methionine. And we  
20 have worked with Penn State University and  
21 Doctors Heather Burley and Paul Patterson have  
22 been doing research in fractionation of

1 natural methionine to concentrate it from  
2 organic feedstuffs. Although the progress has  
3 been incremental, there needs to be much more  
4 done.

5 The available amount of natural  
6 methionine has been outpaced by the U.S.'s  
7 growing demand by consumers for organic  
8 protein foods. We need fermentation of  
9 natural methionine. I understand the  
10 companies are working on that.

11 A couple years' ago, I checked  
12 with a couple companies that I had thought  
13 there was some anticipated some possibility.  
14 But to this point, the process has been  
15 difficult. The need for synthetic methionine  
16 in high levels for peak growth and demands for  
17 poultry, lower levels than adequate create  
18 welfare issues.

19 We continue to need the amount of  
20 two pounds' average on the synthetic  
21 methionine for the life of the bird and we  
22 support that process. It is time to put the

1 effects of animal welfare standards in poultry  
2 for outdoor space as laid out by the NOSB for  
3 2011. Thank you.

4 CHAIR STONE: Thank you, Mr.  
5 Gaiman. Jean?

6 MEMBER RICHARDSON: Hi.

7 MR. GAIMAN: Hi, Jean.

8 MEMBER RICHARDSON: Am I correct  
9 in understanding that over the last 20 years  
10 or so, the change in the breeding of poultry  
11 to give us either on the one hand fast-growing  
12 birds for meat or lots of eggs from the egg  
13 layers, as resulted in much higher nutritional  
14 demands, so that methionine is necessary  
15 because of that, in part, regardless of  
16 whether it is a really small farm outside on  
17 pasture or in a larger production unit?

18 MR. GAIMAN: You are correct about  
19 the process of genetic selection. It has gone  
20 over the last hundred years and it has been  
21 great strides to meet the efficiencies.  
22 America has been great on producing low-cost

1 food and poultry has been a leader in that.

2 And so it is hard to go back in  
3 time. If we supported, even in the early  
4 '60s, hens laid a lot fewer eggs than they do  
5 today. So, that is some of the problem.

6 CHAIR STONE: Nick.

7 MEMBER MARAVELL: You know I would  
8 like to follow up on Jean's question. Could  
9 you just give us a rough idea of with the  
10 flocks that you are associated with, what is  
11 the percentage of laying production over the  
12 life of those flocks and what do you consider  
13 to be an inadequate level of egg production,  
14 in other words, no longer economically  
15 feasible or whatever?

16 MR. GAIMAN: Nick, I'm not sure if  
17 I understood the exact point, the methionine  
18 level?

19 MEMBER MARAVELL: No, I am asking  
20 for, under current practice, how many eggs  
21 would you expect to get from your average hen  
22 per day or per week or whatever. And when

1 does that -- when, it falls to a certain  
2 level, what is that level that is seen to be  
3 not viable anymore? And how long do you keep  
4 the flocks that you are associated with, how  
5 long do you keep the flocks?

6 MR. GAIMAN: Well, that is a good  
7 question. On the present cost of organic  
8 ingredients, the hen, at peak production, the  
9 cost of the hen is like \$12 a bird. So, you  
10 need to get adequate production over the life  
11 of that flock.

12 So, to answer your question, the  
13 flocks peak when they are young, 30-some  
14 weeks' of age. And the end of the flock is  
15 like a little over a year. So, they lay for  
16 about 56 to 58 weeks and around 300 eggs. So,  
17 over that cycle, there is a decreasing.

18 So, the inefficiency would be when  
19 the feed costs are high and the production is  
20 low, then the flock would have to be removed.  
21 But you would have to get the high  
22 depreciation value of the high cost of the

1 original bird.

2 MEMBER MARAVELL: I guess my  
3 point, I am trying to give a tangible idea to  
4 people. If let's say the ideal would be to  
5 get one egg over that 300 plus days per day,  
6 you are not going to get that ever out of a  
7 flock, when it gets to what percentage do you  
8 really start to feel the hurt? I mean when  
9 you go down to 80 percent, 70 percent, 60  
10 percent? Where does that number sort of  
11 really hurt?

12 MR. GAIMAN: Well, with the  
13 competitive nature of the egg industry, if you  
14 are laying five percent less than the normal  
15 for your genetic anticipation, and we follow  
16 our flocks every week, based on the need  
17 performance and what we are experiencing.

18 And so when you are experiencing  
19 less than normal performance, with the cost of  
20 ingredients and all, it really cuts into your  
21 ability to pay down the original investment on  
22 the bird.

1 CHAIR STONE: Thank you Mr.  
2 Gaiman.

3 MR. GAIMAN: Thank you.

4 CHAIR STONE: Randy Mitchell to  
5 the podium and Paige Tomaselli on deck.

6 DR. MITCHELL: Good afternoon --  
7 or good morning, I guess, still. Okay, I  
8 don't want to be beeped at.

9 Okay, thank you. My name is Dr.  
10 Randy Mitchell and I am speaking to the Board  
11 today, representing Coleman Natural Foods.  
12 And I believe I am probably one of lone  
13 broiler guys here speaking specifically  
14 towards organic broilers.

15 I am a poultry nutritionist and in  
16 this capacity, responsible for the nutrition  
17 program for over a hundred farms, the majority  
18 of which are family-owned and operated that  
19 produce organic broilers for Coleman in three  
20 different regions across the U.S.

21 I oversee the development of food  
22 rations to ensure they promote optimal bird

1 health and welfare at the farm level.

2 My comments today are concerning  
3 the addition of synthetic methionine into  
4 organic broiler diets. Methionine is the  
5 first limiting amino acid for chickens and it  
6 is vital for proper development of the animal,  
7 as we have heard several speakers talk about  
8 earlier.

9 Prior to the use of synthetic  
10 methionine, poultry diets were very high in  
11 crude protein. And in order to meet that  
12 requirement, they contained a lot of things  
13 that we don't use today, like animal  
14 byproducts, meat scraps, feather meal, those  
15 things that are just not allowed in organic  
16 broiler production today.

17 To date, no natural substitute for  
18 synthetic methionine has been developed. In  
19 October of 2012, new restrictions on  
20 methionine addition reduced the amount allowed  
21 in broiler chicken feeds by 60 percent and in  
22 layers and other poultry species by 50

1 percent.

2                   Layers and broilers were grouped  
3 together, despite the fact that layers spend  
4 their productive lives as adults when  
5 methionine requirements are lower, whereas,  
6 broilers are juveniles, when these  
7 requirements are much higher.

8                   The National Research Council or  
9 NRC for short, publishes guidelines on the  
10 dietary requirements for many different types  
11 of animals. These guidelines are  
12 internationally recognized by scientists as a  
13 base for nutritional requirements. In the  
14 1994 NRC publication for poultry, the minimum  
15 requirement for methionine for a broiler  
16 chicken from hatching to three weeks' of age  
17 was listed as 0.50 percent of the ration. The  
18 requirement for crude protein for this same  
19 time period was listed as 23 percent.

20                   I should also mention, point out  
21 that these requirements were not derived from  
22 modern fast-growing broilers. Most of this

1 data -- the NRC was published 20 years' ago  
2 and most of that data was gathered, probably  
3 wasn't changed with 1984 NRC and that data was  
4 probably gathered 30 to 50 years ago.

5           So, a starter diet containing  
6 typical ingredients available for organic  
7 production that is formulated to meet NRC  
8 minimum requirements for methionine and only  
9 containing the two pounds per ton level will  
10 contain almost 27 percent crude protein from  
11 the 23 -- higher than the 23 percent actual  
12 requirement. This extra nitrogen from these  
13 high protein diets places a heavy metabolic  
14 burden on the animal at a time when other  
15 stresses such as vaccinations are also  
16 occurring. All of this extra nitrogen is  
17 excreted into the feces, creating a much more  
18 nitrogen-laden litter.

19           The farmers that raise organic  
20 boilers have noticed similar negative effects  
21 of the higher protein diets when these new  
22 restrictions were put into place. These

1 included higher ammonia levels in the barns  
2 there in brooding, wet litter, more foot pad  
3 lesions and higher incidences of the disease  
4 necrotic enteritis, which is frequently fatal.  
5 In fact, our farmers saw an 18 percent  
6 increase in mortality during the first year  
7 following the new methionine restrictions.  
8 These problems are a direct result of the  
9 extra nitrogen in the feed required to supply  
10 methionine.

11 We, at Coleman Natural Foods, have  
12 a deep commitment to the welfare of the  
13 animals that are entrusted to our care. That  
14 is why we would like the committee to consider  
15 two changes in the organic standards related  
16 to methionine. One would be to specifically  
17 for broilers, two and a half pounds per ton,  
18 to recognize the requirement differences from  
19 other poultry species. This would be a 50  
20 percent reduction in the finding from the  
21 previous standard and would be consistent with  
22 the other poultry species.

1                   In addition, I find it interesting  
2                   that three pounds of methionine is allowed for  
3                   turkeys, a 50 percent higher rate than  
4                   broilers when the NRC requirement for  
5                   methionine during breeding is only ten percent  
6                   higher.

7                   Secondly, is to allow nutritionist  
8                   to adjust the levels of methionine to an  
9                   average amount over the lifetime of the animal  
10                  to take into account the high requirement in  
11                  the first few weeks of life.

12                  Coleman Natural Foods, through the  
13                  Methionine Task Force, is committed to  
14                  continuing research in the areas of natural  
15                  methionine sources to less dependence on  
16                  synthetic sources. However, in the interim,  
17                  the change is to two and a half pound  
18                  inclusion for broilers and a lifetime average  
19                  use for all poultry species would have a  
20                  dramatic effect to improve the health and  
21                  welfare of the animals. So, I respectfully  
22                  ask the NOSB to consider them. Thank you and

1 I would be glad to answer any questions.

2 CHAIR STONE: Thank you. I have a  
3 question. We talked about added synthetic  
4 methionine. How many pounds of methionine are  
5 in a typical corn-soy ration by itself?

6 DR. MITCHELL: Okay, a typical  
7 corn-soy ration, well if you look at total,  
8 you are probably talking about 0.03 percent.  
9 I am just going to -- about that. Probably  
10 about a third of the actual or a little over  
11 half of the actual requirement, probably 60  
12 percent of the actual requirement.

13 CHAIR STONE: And if you did the  
14 math of what the average should be for a  
15 broiler, a seven- or eight-week broiler, we  
16 are discussing two to two and a half. What  
17 does NRC -- what is the calculated average  
18 that the bird would require?

19 DR. MITCHELL: As far as over the  
20 lifetime of the animal?

21 CHAIR STONE: Yes.

22 DR. MITCHELL: The calculated

1 average would probably be in the 0.42 to 0.44.  
2 And one of the reasons that might be a little  
3 bit difficult is because of course during the  
4 first three weeks' of life, the animal is not  
5 eating a whole lot of feed. Whereas, in the  
6 last several weeks, they are eating a lot of  
7 feed requirement.

8 So, I want to say probably 0.43,  
9 0.44 something like that would be the average  
10 requirement that would be required.

11 CHAIR STONE: So how many pounds  
12 of synthetic methionine would be the average  
13 you would need to add to hit that optimum  
14 level? We are saying two and a half. But is  
15 it two and a half or 2.6.

16 DR. MITCHELL: Right. Right. So,  
17 what two and a half would do for us is it  
18 would allow us to meet that level and reduce  
19 our overall protein level down closer to that  
20 23 percent. And that is really important to  
21 counteract the litter problems that we have,  
22 the enteritis, the necrotic enteritis is

1 really our main health issue, unlike the  
2 laying hen guys where feather pecking is more  
3 of a major concern.

4 CHAIR STONE: Okay, great. Thank  
5 you very much. Thank you for being here.

6 DR. MITCHELL: Okay.

7 CHAIR STONE: I lost my place.  
8 Paige Tomaselli to the podium and Ashley  
9 Swaffer on deck.

10 MS. TOMASELLI: Good morning. My  
11 name is Paige Tomaselli and I am a senior  
12 attorney at the public interest organization  
13 Center for Food Safety. Last week, Center for  
14 Food Safety released a paper analyzing USDA's  
15 decision to delay animal welfare regulations.  
16 The paper concludes that USDA is making a  
17 mistake since animal welfare is a clear  
18 priority for the organic community. When USDA  
19 announced its intention to stall animal  
20 welfare regulations, it pointed to an economic  
21 impact assessment that found the impact on the  
22 largest organic egg producers. Those housing

1 more than 100,000 birds would be quote,  
2 unquote, substantial. Our analysis reveals,  
3 however, that the vast majority of egg and  
4 poultry operations would not be financially  
5 impacted by increased animal welfare  
6 standards.

7 We conclude that by ignoring  
8 expectations and ethics inherent in organic  
9 purchasing habits, USDA's inaction could  
10 threaten the overall success of the organic  
11 brand.

12 Center for Food Safety has  
13 consistently promoted strong animal welfare  
14 standards because we believe they are critical  
15 to the organic label. As our paper shows,  
16 organic consumers pay a premium for organic  
17 foods and with that, comes certain  
18 expectations. For those that purchase organic  
19 products, cruel and unnatural treatment is not  
20 consistent with the term organic. In fact, in  
21 September 2013, Center for Food Safety has  
22 surveyed its members. The vast majority of

1 CFS members indicated that animal welfare was  
2 one of the top reasons they purchased organic  
3 poultry and eggs.

4 People also choose higher welfare  
5 animal products because they want healthier  
6 food. The evidence is mounting that even  
7 minimal improvements in production systems  
8 offering animals greater opportunities for  
9 exercise, behavioral expression and naturally  
10 suited diets, such as those contained in  
11 NOSB's recommendations can drastically improve  
12 animal welfare and the nutritional quality of  
13 animal products. USDA ignored these and other  
14 non-economic considerations in the its  
15 decision to stall the regulations.

16 NOSB's animal welfare  
17 recommendations are minimal. CFS believes  
18 that stricter standards are surely warranted  
19 under the organic label. NOSB's  
20 recommendations are, however, a necessary next  
21 step. That the largest poultry operations may  
22 not be able to comply raises serious doubts

1 about these operations' ability to boast the  
2 organic label.

3           Directly related to animal welfare  
4 is methionine. CFS is opposed to the  
5 Livestock Committee's methionine proposal. We  
6 have consistently urged USDA to put forward a  
7 research plan, to aid organic farmers and  
8 removing synthetic methionine from organic  
9 poultry production. To date, USDA has not  
10 done so. Organic poultry operations cannot  
11 continue to use synthetic methionine in their  
12 organic operations. Instead, innovative  
13 alternatives such as insects like Black  
14 Soldier fly, whey, increased access to pasture  
15 and other natural sources of methionine must  
16 take the place of synthetic methionine.

17           Streptomycin in organic orchards  
18 should not be extended because it is  
19 incompatible with organic systems and because  
20 it poses unnecessary threats to human health.  
21 The risk of using streptomycin are even  
22 clearer than those from using tetracycline,

1       which the NOSB voted allow to Sunset at its  
2       April 2013 meeting. Organic agriculture  
3       should prohibit the use of antibiotics once  
4       and for all to preserve the efficacy of these  
5       essential human drugs.

6                   CFS also strongly disagrees with  
7       the NOP edict to remove all discussions about  
8       NOSB members' potential conflicts of interest  
9       out of public view and behind closed doors.  
10      This undermines the purpose of requiring  
11      conflict of interest disclosures in the first  
12      place, which is to ensure public  
13      accountability and checks and balances in NOSB  
14      decision-making.

15                   CFS urges the NOSB to call upon  
16      the NOP to take a more proactive role in  
17      advocating that USDA develop mandatory GE  
18      contamination prevention measures by patent  
19      holders and GE technology users that are  
20      protective of organic agriculture.

21                   On behalf of organic community, we  
22      further urge you to directly communicate with

1 Secretary Vilsack, the organic community's  
2 dissatisfaction with his coexistence policy,  
3 which serves to perpetuate GE contamination  
4 and threaten organic integrity.

5 Thank you.

6 CHAIR STONE: Thank you very much.

7 Zea?

8 MEMBER SONNABEND: Thank you. You  
9 crammed a lot in there.

10 MS. TOMASELLI: I only had four  
11 minutes. Sorry about the speed talking.

12 MEMBER SONNABEND: Well, my  
13 question is concerning the methionine  
14 recommendation as it relates to animal  
15 welfare. And you know we are hearing from  
16 people that without modifying the  
17 recommendation that is now in effect, that we  
18 are contributing to animal cruelty and not  
19 taking into consideration animal welfare over  
20 the life of the flock, by changing from the  
21 life of the flock from what it is now. And  
22 yet we also heard that the alternatives,

1 including the Black Soldier bugs are not  
2 registered for them to use.

3 So, when you say you can't support  
4 the change, I don't see how we cannot vote for  
5 it unless we are affecting animal welfare.  
6 So, I would like to hear your perspective on  
7 that.

8 MS. TOMASELLI: Well, I think one  
9 thing that I think is really clear is that if  
10 the NOSB puts a hard Sunset in place, that the  
11 market will adjust and really promote some of  
12 these other alternatives and allow for  
13 research and create the supply because there  
14 will be a demand for it. So, I do think that  
15 adding a conclusive hard Sunset deadline will  
16 promote the kind of research that is necessary  
17 in this area. And I feel that it is up to  
18 USDA and the industry to promote that research  
19 at as fast of a pace as is possible.

20 As far as the recommendation that  
21 is on the table, the proposal that is on the  
22 table, I have heard both sides of the story.

1 I think our comments speak to our position on  
2 it and so I can't really speak to more of that  
3 now. But I do feel that a hard Sunset  
4 deadline is appropriate here. Methionine has  
5 been, synthetic methionine has been used for  
6 13 years and it is going to be used for the  
7 next four or five years. And I think that is  
8 long enough for the industry to come up with  
9 an alternative.

10 Yes?

11 CHAIR STONE: Jennifer.

12 MS. TOMASELLI: Sorry.

13 MEMBER TAYLOR: Thank you for your  
14 presentation.

15 MS. TOMASELLI: You're welcome.

16 MEMBER TAYLOR: Can you tell me if  
17 there are any additional issues maybe if you  
18 look at farmer selection of maybe a fast-  
19 growing poultry broiler versus a slower  
20 growing one in relation to methionine  
21 dependency?

22 MS. TOMASELLI: Yes, there are

1 definitely issues. The research has shown  
2 that the slowing growing broilers require less  
3 synthetic inputs of methionine. I also think  
4 that the poultry industry has sped up and the  
5 consumer demand for poultry is great. And so  
6 when you have that kind of consumer demand,  
7 you have the poultry industry trying to rush  
8 to meet that demand, although I don't  
9 necessarily agree that is the proper way to go  
10 about producing poultry. I think if you take  
11 the natural lifespan of organic poultry into  
12 consideration and the way that an animal is  
13 supposed to grow, the conditions are more  
14 naturally suited and you will have to require  
15 less synthetic inputs.

16 CHAIR STONE: Wendy?

17 MEMBER FULWIDER: What do you  
18 think is the most promising alternative?

19 MS. TOMASELLI: What do I think is  
20 the most promising alternative? In this last  
21 round of comments, we did a lot of research on  
22 insects, including Black Soldier flies. I

1 realize there is some regulatory hurdles. But  
2 what we think three to five years is exactly  
3 the amount of time where methionine could  
4 sunset for good and so I think the FDA would  
5 hear that methionine is sunseting and fast  
6 track any alternative through the animal feed  
7 process as necessary. So, I do think that  
8 insects are a viable alternative. I also  
9 think because they are part of a system and  
10 they are created on compost, poultry compost,  
11 that that feeds into the system's approach of  
12 the organic model and it would be a holistic  
13 way to approach the situation.

14 CHAIR STONE: Thank you, Paige.

15 MS. TOMASELLI: Yes.

16 CHAIR STONE: Ashley Swaffer. I  
17 hope I got that right. I apologize. And  
18 David Will on deck.

19 MS. SWAFFER: Hi. My name is  
20 Ashley Swaffer and I am the President of the  
21 Organic Egg Farmers of America. The Organic  
22 Egg Farmers of America represent over 45

1 member companies and seven million organic  
2 laying hens. We appreciate the opportunity to  
3 comment on the issue of methionine in organic  
4 layer chicken diets. We wish to register our  
5 support for the initial petition and  
6 subsequent Livestock Committee recommendation  
7 to change the amount of DL-methionine from two  
8 pounds maximum to two pounds average over the  
9 life of the bird.

10 Our membership has seen numerous  
11 issues related to inadequate amount of  
12 methionine in current diets. Methionine is a  
13 limiting amino acid and by not feeding in  
14 proper quantities, it limits all other amino  
15 acids to the level in the diet.

16 The issues that our members are  
17 seeing is feather pulling, cannibalism,  
18 increased mortality, feather eating, and high  
19 ammonia levels in barns. We are seeing these  
20 issues across all types of production styles  
21 and flock sizes, from flocks as small as 850  
22 hens to larger flocks. And we are seeing

1 these issues on farms from minimal outdoor  
2 access to pasture-based systems.

3 We do have members that are trying  
4 alternative products to methionine but those  
5 products are not commercially available to  
6 feed all the organic laying hens. The key  
7 when exploring the alternative products is  
8 that we need sufficient quantities to be able  
9 to support the nine million in growing organic  
10 laying hen population.

11 We believe that making this  
12 technical fix from allowing two pounds maximum  
13 to two pounds average over the life of the  
14 bird will lead to better welfare conditions,  
15 helping the consumer expectations for  
16 responsible organic husbandry. We are proud  
17 to come together as organic egg producers to  
18 share information on best practices and are  
19 united in our recommendation. Many of our  
20 members are here today to also give their  
21 personal comments.

22 Thank you. Any questions?

1 CHAIR STONE: Thank you. Jay.

2 MEMBER FELDMAN: Thank you. Do  
3 you see any scenario in which we would no  
4 longer need synthetic methionine? If so, what  
5 does that scenario look like? And if not, why  
6 not?

7 MS. SWAFFER: I'm not 100 percent  
8 as versed as the following presenter behind  
9 me. David Will represent the Methionine Task  
10 Force and I think that question would be  
11 better suited for him.

12 CHAIR STONE: Great. Thank you.  
13 Thank you for being here as well.

14 (Applause.)

15 CHAIR STONE: David Will to the  
16 podium and John Brunquell on deck.

17 MR. WILL: Hi. I'm going to start  
18 before the clock so I have an extra second.  
19 I want that mug.

20 Anyhow, my name is David Will and  
21 I am here representing members of the  
22 Methionine Task Force. We are a group that

1 has banded together and self-funded. We  
2 represent from very small to very large  
3 producers, both broiler and layer. We  
4 anticipate that we represent about 85 percent  
5 of the entire layer production in the United  
6 States. In addition, we represent, as I was  
7 told, a majority of the broilers.

8           What I wanted to talk about is  
9 that we do support the change that the  
10 Livestock Committee passed of changing it from  
11 a hard cap to an average. I think the  
12 majority of us in this room are parents. And  
13 the one thing that we wanted to point out is  
14 that none of us feed an infant, like we feed  
15 a child, like we feed an adult, like we feed  
16 a senior. And the hard cap really forced us  
17 into doing that.

18           Those of us who don't have  
19 children, if you walk the pet food aisle, you  
20 see numerous foods and rations that are  
21 designed for young dogs to old dogs. So, it  
22 seems like all animals get that opportunity

1 and we really need to change that average to  
2 an average so that we can adjust for the age  
3 of our birds.

4 We have had numerous issues  
5 reported to us from our membership on the  
6 methionine and perhaps the most interesting  
7 thing we got was we were reported by several  
8 certifiers that when they had walked flocks  
9 one year to the next, the increase in the  
10 nervousness in the flocks that they had seen  
11 was quite interesting to them. And I know  
12 those comments were passed and some written  
13 and also to the Livestock Committee.

14 We also saw a tremendous amount of  
15 increase in feather pecking and eating of  
16 feathers. And we also had, especially with  
17 this year being as cold a winter as we had, we  
18 had quite a bit of problems reported to us of  
19 ammonia levels in barns due to the overfeeding  
20 of protein.

21 When we took out the extra  
22 methionine, what we put in was soybean meal

1 and corn and it really did change the protein  
2 levels, and therefore, changed the manure,  
3 which made the houses have much tougher air  
4 quality issues for them.

5 Also, just being fair to all of  
6 our members, we would like to support that the  
7 broilers, if you are going to take the 50  
8 percent cut across the board since 2012 step-  
9 down, we would like to do the math correctly  
10 and say that five is two and a half and  
11 support the broiler average going to there.

12 The Methionine Task Force is  
13 committed to doing future work. We funded a  
14 study to North Carolina that listed and did  
15 research on all of the possible methionine  
16 sources out there. We are now, once they are  
17 done with their broiler study, or their  
18 survivability of layer studies, we are going  
19 to go back to them and ask them to take the  
20 top five or seven and do some work on those,  
21 to find out if they are viable and if so, how  
22 available. And we do guarantee that we will

1       come back and do reports on that and make that  
2       information available to all of our members.

3                   And just quickly, somebody had  
4       asked about sunflower meal. We actually feed  
5       one flock, one entire flock sunflower meal for  
6       a different ration that we use and it is the  
7       most difficult ration to get. We constantly  
8       are having trouble sourcing that product. So,  
9       I just wanted you to know that.

10                   CHAIR STONE: Thank you, David.

11                   MR. WILL: Three seconds.

12                   CHAIR STONE: Jay, did that get to  
13       your question or do you want to follow-up?

14                   MEMBER FELDMAN: Do you feel that  
15       we will ever get off of the methionine  
16       dependency? If not, why not? And if so, how  
17       would we do that and how would you recommend  
18       the Board move toward that transition?

19                   MR. WILL: I don't know that we  
20       are very going to get off the dependency.  
21       Part of it is you have to understand  
22       methionine is one of the most expensive

1 ingredients that we add to our ration. We  
2 would all love to look for a source. But if  
3 we take up the combined dollars that we spend  
4 on methionine nationally between broilers and  
5 organic, we estimate that at about \$3 million  
6 and that is a tough thing.

7 In addition, with your own survey  
8 that you guys presented in Savannah, consumer  
9 push back on leak byproducts which was being  
10 used, which was the standard ration in the  
11 1940s was overwhelmingly rejected by  
12 consumers. I can't imagine standing in front  
13 of a grocery and saying now with more bug  
14 larvae than ever that we are going to get a  
15 huge following.

16 Organic, especially on eggs, has  
17 really grown out of our core markets. You  
18 know, it is hard to walk into a supermarket  
19 now and not find organic eggs and we have  
20 really changed the consumer that we are going  
21 for. There are certain consumers in this  
22 marketplace that are absolutely in love with

1 organic and will buy it no matter what. But  
2 as they found them in other retailers, they  
3 are buying them for more whim than the message  
4 that they are sending. And I think that  
5 consumer we would lose very quickly.

6 CHAIR STONE: Zea.

7 MEMBER SONNABEND: Thanks, David,  
8 for your comments.

9 In spite of your aspersion to bug  
10 larvae, which chickens who peck on the ground,  
11 that is what they are mostly eating, did the  
12 North Carolina study indicate that the Black  
13 Soldier bugs were one or any other insect  
14 sources were a good source of methionine? And  
15 what is your perception of how viable that is  
16 in the future as an alternative?

17 MR. WILL: I think it is viable.  
18 The survey did find a couple different  
19 interesting bugs. I don't specifically  
20 remember what it said about the Black Soldier  
21 fly but what I do remember is it said that  
22 silk worms were actually quite high in

1 methionine. And so our own company has taken  
2 that and realized that silk worms eat a  
3 single-source product, which is mulberry  
4 leaves. And we have actually tested mulberry  
5 leaves and we found that they actually do have  
6 some methionine in them. The problem is,  
7 number one, they are not commercially  
8 available, and number two, the process of  
9 getting them into the feed, the amount of  
10 tonnage that you would have to put in is  
11 crazy.

12           And you have to remember something  
13 that was said earlier by Ernie is we have a  
14 ration we have to balance against. So, it is  
15 not only just methionine, it is protein. It  
16 is energy. And if we make minor subtle  
17 changes by adding even alfalfa because there  
18 is no energy in that, it throws everything  
19 else off and it just kind of staggers all  
20 throughout.

21           I think there is options. One of  
22 the good ones that we also identified was

1 Brazil nuts. That is going to be on the top  
2 of our testing. But again, it is commercial  
3 availability.

4 I think that we stand a better  
5 chance of finding something that may be non-  
6 synthetic than organic as a replacement. And  
7 that may be something we have to come back to  
8 you with. But I do also tell you that all of  
9 the members of the Task Force, we still have  
10 a little bit of money in the bank and we are  
11 going to bankroll the next study with this.  
12 And we are going to find and feed a long-term  
13 trial to try to find some options.

14 CHAIR STONE: Jennifer?

15 MEMBER TAYLOR: Thank you for your  
16 presentation. Can you tell me if you are  
17 aware of earthworms being used as a potential  
18 source for methionine and how available is  
19 that source?

20 MR. WILL: Again, it is a matter  
21 of how many you have to have. Even on a small  
22 flock of 850 birds, that amount of protein

1 that you would have to have available for them  
2 is very tough. And I don't remember anything  
3 specifically out of the report either that  
4 listed the methionine content.

5 We did have a professor of  
6 entomology at the University of California at  
7 Riverside, right by our offices, Brad Mullens.  
8 He is actually going through the report right  
9 now to pick out which insects he thinks are  
10 favorable and which would least garner FDA  
11 disapproval. So, we are looking at some  
12 options.

13 CHAIR STONE: Thank you, David.  
14 Thank you for your work on the Task Force as  
15 well.

16 MR. WILL: No problem. Thank you.

17 CHAIR STONE: One more? Nick, go  
18 ahead.

19 MEMBER MARAVELL: This is a  
20 question you don't necessarily need to answer  
21 right now but perhaps take back to the Task  
22 Force.

1                   What is it that we on the NOSB  
2                   could do to provide an acceptable incentive  
3                   for the industry to move away from synthetic  
4                   methionine? And as I said, if you have  
5                   immediate reaction, that's fine but is there  
6                   a way to provide a positive incentive that  
7                   would work for everyone?

8                   MR. WILL: Cash.

9                   (Laughter.)

10                  MR. WILL: I think the first  
11                  message you sent of the step-down from the  
12                  five pounds, four pounds, to the two and a  
13                  half and two, and three for turkeys, broilers  
14                  -- turkeys and ducks was a very clear message  
15                  for us. And it is not a matter of inactivity,  
16                  it is a matter of really trying to find an  
17                  option that, number one, is first commercially  
18                  available, and second is acceptable. And  
19                  third and most important, promotes animal  
20                  welfare within the confines that we have to be  
21                  organic.

22                  And I think that we are working

1 for that and I think you will see more updates  
2 as the years go forward of some research that  
3 we are doing. But you have sent a pretty  
4 clear message and we have heard you.

5 CHAIR STONE: Thank you, David.

6 MR. WILL: Thank you.

7 CHAIR STONE: And thanks for your  
8 work with the Task Force.

9 (Applause.)

10 CHAIR STONE: John Brunquell to  
11 the podium and Amy Simpson on deck.

12 MR. BRUNQUELL: Good morning.  
13 Thank you for the opportunity to present  
14 information. What I am going to speak to is  
15 methionine but I am going to try and have a  
16 couple pictures be worth a whole lot of words.

17 By way of background, I am the  
18 President of Egg Innovations. Egg Innovations  
19 represents 40 small organic farmers throughout  
20 the Midwest. We have production from north-  
21 central Wisconsin down to western Ohio and all  
22 points in-between.

1                   My scientific background is I have  
2                   a master's degree in poultry science. I am  
3                   also a member of the Farmer Advisory Council  
4                   of the Organic Trade Association. I have also  
5                   been a direct producer, growing up on an egg  
6                   farm, collecting eggs since I was three years  
7                   old. I have been a producer for over 30  
8                   years.

9                   What I want to show you next are  
10                  two simple pictures. You are going to see two  
11                  pictures of flocks, both on two square feet  
12                  outside, the NOSB recommendations of land.  
13                  So, what we wanted to do is we wanted to take  
14                  away a lot of the noise about speculation.  
15                  What if they were outside, would they get more  
16                  methionine compared to being inside?

17                  So, here is a flock of non-organic  
18                  birds on three pounds of methionine, raised --  
19                  you can see the feathering, the outside  
20                  access. And this is two square feet per bird  
21                  outside on this facility. And this is two  
22                  pounds.

1                   This is an organic flock, same  
2                   age, same physical setup. All of our barns  
3                   are identical. They are all the same length,  
4                   same width, same outside access. And we  
5                   wanted to explore that answer. You can see  
6                   the feathering is significantly less.  
7                   Although we are huge advocates for birds going  
8                   outside on the ground and we did see feather  
9                   regrowth in summer, as the birds had an  
10                  opportunity, but clearly, methionine is an  
11                  animal welfare issue. And we saw it very  
12                  direct.

13                         And we actually did feather scores  
14                         and we worked with Dr. Jacquie Jacob out of  
15                         the University of Kentucky and we quantified  
16                         this data.

17                         The other issue I want to show you  
18                         is an issue that I haven't seen since I was a  
19                         child. It is called bumblefoot. It very  
20                         simply means that when a bird cuts its foot  
21                         open for any of a variety of reasons, say  
22                         another bird steps on its foot, if it is in a

1 high-ammonia environment, it has an  
2 opportunity to get infected. For the first  
3 time in my career, I saw that in our organic  
4 flocks last winter.

5 This is an animal welfare issue.  
6 It is not about money. I am a huge advocate  
7 for reducing methionine. I appreciate the  
8 question you have been asking all the time,  
9 what is the pathway. We are passionate about  
10 getting there also. We actually do believe we  
11 will get there. I don't know if it is in four  
12 years but we will get there, as we figure out  
13 alternatives.

14 But I care about the birds that I  
15 take care of and this is the environment I am  
16 in today. As such, our opinion is we support  
17 the request to allow the methionine usage  
18 being raised to an average instead of a cap.

19 If you have any questions, I would  
20 be glad to answer them.

21 CHAIR STONE: Thank you, John.  
22 And those pictures were valuable. Thank you

1 for bringing them.

2 (Applause.)

3 CHAIR STONE: Amy Simpson to the  
4 podium and Jim Winter on deck.

5 MS. SIMPSON: Good morning. I am  
6 Amy Simpson, Policy Director and Staff  
7 Attorney for Beyond Pesticides. But  
8 personally, I am also a mom, an organic  
9 community garden president and organic  
10 consumer.

11 I realize that each one of you who  
12 sits on this Board have many different roles  
13 and many different responsibilities. Despite  
14 these differences, however, there are certain  
15 responsibilities and duties that unify all of  
16 you and do not differ. Indeed, cannot differ.  
17 These are the duties set forth in the very law  
18 that created the National Organic Standards  
19 Board, National Organic Program and Organic  
20 Production Standards. Given recent  
21 reinterpretations of these duties, and I would  
22 argue misinterpretations concerning many, I

1 feel it is my duty in all of my roles to  
2 clarify what the founding law describes as the  
3 unequivocal mandatory responsibilities of the  
4 Board and the USDA in relationship to the  
5 Board.

6 I would like to emphasize the  
7 following duties go beyond those established  
8 under FACA. And though USDA would have you  
9 think that you are nothing special, it is in  
10 accordance with FACA to create and support a  
11 Board with broader, mandatory duties. The  
12 NOSB is unique because of the extent of these  
13 broader duties and powers vested in it by the  
14 Act.

15 First, the NOSB must provide  
16 recommendations to the Secretary on the  
17 implementation of OFPA as a whole. The  
18 statute does not state that this duty is at  
19 the request or discretion of the Secretary.  
20 The NOSB must develop the proposed National  
21 List and proposed amendments. And this  
22 development must follow the specific statutory

1 standards and procedures outlined in the  
2 statute. This responsibility is not limited  
3 to the creation of the first National List but  
4 also the continuing changes to that list. The  
5 NOSB must follow statutory requirements in  
6 establishing the proposed National List and  
7 its amendments. NOSB evaluations of  
8 substances considered for inclusion on the  
9 National List must contemplate several  
10 criteria, such as effects on human health and  
11 alternatives. These criteria are the only  
12 criteria provided for in the Act for  
13 evaluating National List materials. None of  
14 the evaluation criteria include or reference  
15 economic impacts. The NOSB must establish  
16 National List petition procedures. It is the  
17 Board, not the USDA that is tasked with  
18 establishing these procedures.

19 The NOSB must perform a host of  
20 specific functions beyond National List  
21 development and OFPA implementation. And  
22 finally, NOSB must review existing National

1 List materials every five years. If the Board  
2 fails to conduct this review, the material  
3 would no longer be valid on the National List.

4 Now, the Secretary and NOP also  
5 have a number of important mandatory duties in  
6 relation to the NOSB. First and foremost, the  
7 NOSB must exist. Unlike many FACA boards, the  
8 NOSB is not a board established at the  
9 Agency's discretion or with a finite life  
10 term. The Secretary must consult with the  
11 NOSB on developing not only the National List  
12 but also the entire National Organic Program.  
13 This is a general provision, not a National  
14 List-specific provision.

15 The Secretary must base the  
16 National List on the NOSB proposed National  
17 List or amendments. And there is an absolute  
18 bar against listing synthetics not on the  
19 NOSB's list. This emphasizes that a proposed  
20 list from the NOSB is not mere advice.

21 And finally, every five years, the  
22 Secretary must determine whether to renew a

1 National List material. Should the Secretary  
2 fail to affirmatively renew and note that the  
3 only option in the language of the Sunset  
4 provision is to renew, then the material would  
5 be invalid on the National List.

6 Again, I recognize there are a lot  
7 of differing roles, interests on the NOSB.  
8 These differences, however, do not change the  
9 shared fundamental duties and collaborative  
10 intent established in the law that you all  
11 must uphold, regardless of regulatory  
12 dysfunction. Thank you.

13 (Applause.)

14 CHAIR STONE: Thank you, Amy.

15 Questions? Thank you, very much.

16 MS. SIMPSON: You're welcome.

17 CHAIR STONE: Jim Winter to the  
18 podium and Dan Giacomini on deck.

19 MR. WINTER: First of all, good  
20 afternoon and thank you for the opportunity to  
21 speak to you this afternoon. My name is Jim  
22 Winter. I manage the Agri Business for Ecolab

1 of North America. I am also past president of  
2 the National Mastitis Council. And I just  
3 want to thank you for the time you spend  
4 volunteering your time. I spent ten years on  
5 the National Mastitis Board in a similar  
6 volunteer role. So, I understand the time it  
7 takes.

8 The reason I am here today is to  
9 support the approval of the use of acidified  
10 sodium chlorite as an active in teat dips used  
11 in organic livestock production. Currently,  
12 pre- and post-milking, teat dipping with an  
13 efficacious teat dip are two of the most  
14 important things you can do on a dairy farm to  
15 improve milk quality and reduce mastitis.

16 Today, organic producers are  
17 limited to using teat dips that contain a  
18 select few actives. Each of these actives has  
19 weaknesses that can impact their suitability  
20 for use on an organic dairy farm.

21 In full disclosure, Ecolab  
22 produces teat dips with many of the actives

1 that you approve and we sell to the organic  
2 industry but we are all about trying to  
3 provide the best new technology for our  
4 customer base.

5 First of all, chlorhexidine, which  
6 is on the list. Chlorhexidine does not have  
7 broad spectrum kill and, in fact, there are  
8 certain mastitis pathogens that can actually  
9 grow in a chlorhexidine teat dip.

10 Furthermore, there was a paper  
11 recently published by Middleton et al out of  
12 Missouri that pointed out that chlorhexidine  
13 has a long elimination half-life in milk, a  
14 lack of human dietary exposure data to suggest  
15 a food tolerance to food products and the FDA  
16 has published zero tolerance for chlorhexidine  
17 in uncooked eatable calf tissue. Yet, it is  
18 one of the options.

19 Two, iodine. Iodine is the number  
20 one teat dip -- number one active use in teat  
21 dips in the U.S. for all dairies. However,  
22 its use has declined in the past few years,

1 due to the increased cost for iodine and the  
2 increased concern for iodine residue in milk.

3           Furthermore, a more recent concern  
4 is that the primary complexing agent that  
5 brings the raw iodine into a teat dip so that  
6 it becomes usable in a teat dip is something  
7 called nonylphenol ethoxylate, which is called  
8 NPE. NPE is a particular ingredient, a  
9 surfactant that is on the watch list by EPA  
10 and they are looking at the potential of  
11 eliminating it. So, that is a concern with  
12 iodine teat dips.

13           Hydrogen peroxide, a third product  
14 on the list, is an excellent germicide, when  
15 formulated correctly with an acid to reduce  
16 the pH. However, this particular product is  
17 heavily impacted, negatively impacted by  
18 organic matter and also certain enzymes that  
19 are found on skin tissue, which are also found  
20 on the teat.

21           With that, I strongly believe that  
22 acidified sodium chlorite, which generates

1 chlorine dioxide germicide, that is a broad  
2 spectrum oxidizing germicide that degrades  
3 really into chloride and lactic acid, which  
4 are both indigenous to milk, the same  
5 chemistry is currently by the NOP for use of  
6 an antimicrobial no-rinse food treatment.

7 Chlorine dioxide is not chlorine.  
8 A lot of people think that it acts like  
9 chlorine. It is not chlorine. Therefore, it  
10 does not generate the harmful halogenated  
11 organics which chlorine can produce. That is  
12 why chlorine dioxide is the preferred water  
13 treatment chemistry in the industry.

14 Furthermore, because acidified  
15 sodium chlorite is so broad spectrum, it is a  
16 lot more efficacious on a dairy farm than a  
17 chlorhexidine-based dip without the residue  
18 concern.

19 As organic dairymen work to become  
20 more sustainable, they are moving more to  
21 composted bedding where chloroform bacteria  
22 can be prevalent. They need a broad spectrum

1       teat dip that is effective and performs when  
2       challenged with heavy organic matter.

3               Acidified sodium chlorite fits the  
4       bill and data is available showing significant  
5       less new E. coli intramammary infections, when  
6       compared to iodine teat dips.

7               I appreciate very much your time  
8       and I hope that you consider acidified sodium  
9       chlorite as an active in organic teat dips.

10              Thank you.

11              CHAIR STONE: I'm looking to the  
12       dairy over here. Francis.

13              MEMBER THICKE: Thank you. I am a  
14       dairy farmer but I have not used NaClO but I  
15       have heard people who have used it, actually  
16       not many, but they say when you mix the acid  
17       with the chloride that there is a gas  
18       produced, chlorine dioxide. Are you familiar  
19       with that?

20              MR. WINTER: Yes. Essentially  
21       what happens, you use typically on the  
22       majority of the acidified sodium chlorite teat

1 dips which we produce and other of our  
2 competitors produce, you use lactic acid --

3 CHAIR STONE: Stay on the  
4 microphone, please.

5 MR. WINTER: Oh, excuse me. You  
6 mix lactic acid with sodium chlorite. That  
7 produces chlorous acid, which will generate  
8 chlorine dioxide. The chlorine dioxide will  
9 give you a slight odor of chlorine like you  
10 would smell chlorine because the chloride  
11 dioxide is a gaseous state.

12 MEMBER THICKE: Isn't it also a  
13 toxic material when you breathe in? I mean,  
14 actually the TR is not very good in this  
15 situation. I have been doing some more  
16 research. It is an eye irritant and a lung  
17 irritant.

18 MR. WINTER: Yes, you are correct  
19 that TR is not real well when it comes to  
20 that. There are specific guidelines as parts  
21 per million of the ClO<sub>2</sub> gas that can be  
22 breathed in. The use of it in teat dips, we

1 don't even approach the parts per million that  
2 would create a problem.

3 The biggest issue is when you use  
4 a very strong acid, like a sulfuric acid and  
5 you mix that with a sodium chlorite. Then,  
6 you will get a heavy blow off of chlorine  
7 dioxide. And that is where the concern is.

8 When you are using what we call a  
9 protic acid or a mild acid like lactic acid,  
10 citric acid and you mix it with sodium  
11 chlorite, you do not get anywhere near the  
12 parts per million that are a concern to the  
13 industry.

14 MEMBER THICKE: But people have  
15 reported they can smell that gas coming out  
16 when they mix that.

17 MR. WINTER: Well, they will get  
18 some odor, just like you will get odor if you  
19 used an iodine teat dip.

20 MEMBER THICKE: Thank you.

21 MR. WINTER: Yes.

22 CHAIR STONE: Very good. Thank

1 you very much for being here.

2 MR. WINTER: Sure.

3 CHAIR STONE: Dan Giacomini to the  
4 podium and Ann Mosness on deck.

5 And folks, just one second here.  
6 We are about 20, 25 minutes behind. That is  
7 going to put us closer to 12:45 or even later,  
8 breaking for lunch. Just so you know that,  
9 and the audience as well.

10 Dan.

11 MR. GIOCOMINI: Thank you. My  
12 name is Dan Giacomini. I work in animal  
13 nutrition, dairy management, and organic  
14 consulting. I am a former member of the NOSB,  
15 having served on the Livestock Subcommittee,  
16 Chairperson of the Materials Committee, and  
17 Board Chairman.

18 In a day and a half of this  
19 meeting, I could talk about a lot of things  
20 but I am here today to encourage the Livestock  
21 Committee to reconsider their vote on the  
22 acidified sodium chlorite and I support its

1 listing as a teat dip on 603.

2 I argue that there is producer  
3 demand for the substance. Numerous times over  
4 the years as a consultant, I have seen where  
5 this substance was the preferred teat dip of  
6 dairy farms, prior to conversion to organic  
7 and they would love to have this tool  
8 available again.

9 In two weeks of working on this  
10 project, I have a petition of 35 names,  
11 including producers from six states, as well  
12 as processors, dairy industry workers,  
13 veterinarians, including one of the top  
14 organic vets in the U.S. and consumers.

15 Additionally, in the fall, public  
16 comment on regulations.gov, Dr. Cindy Daley,  
17 Professor and Managing Supervisor for the  
18 Certified Organic Dairy at Chico State  
19 University, supported this substance.

20 I was on the Board when ASC was  
21 added to 605 for handling. It easily met the  
22 criteria. It passed 12 to 2, largely because

1 of its effectiveness and the end products of  
2 water, citric acid, and salt entering the  
3 environment. It is worth noting that ASC is  
4 not included in the chlorine materials listing  
5 on 605. This technology is totally different.

6 I admit that if it were up to the  
7 current TR, I would vote the same as the LC.  
8 Sorry about that. I commend the LC for the  
9 great job they did on getting most of the  
10 basic information correct. You referenced the  
11 2009 recommendation. However, the TR is  
12 likely the source from which the listing of  
13 organically allowed teat dips in the  
14 recommendation is not correct.

15 Overall, the TR stinks. It is too  
16 long and makes up for it by being confusing  
17 and misleading. I wish I had the time to go  
18 through all the problems that I see with the  
19 TR. The TR poorly describes the final  
20 products from the substance entering the  
21 environment, being water or leak acid and  
22 table salt. The TR refers to a 605 status in

1 regard to a 603 substance, which is irrelevant  
2 and confusing.

3           The lists provided in the TR are  
4 confusing and easily misrepresented. The TR  
5 ignores on-farm situational issues related to  
6 this substance and allowed alternatives, such  
7 as bedding, milking practices, and  
8 effectiveness in breadth of kill and impact of  
9 teat dip on effectiveness. It ignores full  
10 environmental impact from contamination, both  
11 as it occurs in the general environment and in  
12 the milk supply. And in all these situations,  
13 there are conditions where ASC is as good or  
14 better than the best currently allowed  
15 alternatives.

16           The impact on loss of efficacy of  
17 the available options, as can happen regularly  
18 on on-farm situations in a non-sanitary barn  
19 condition is ignored. These impacts include  
20 increasing levels of somatic cell count,  
21 increasing mastitis, negative impact on animal  
22 health, disease, and welfare, increased

1 potential need for antibiotics and decrease in  
2 the length of the animal's productive life.

3 Again, in many situations, ASC is  
4 as good as or better than the best  
5 alternatives available.

6 The alternative impact and the  
7 status of teat dip in health is not discussed  
8 in the TR and many conditions causing chapped  
9 teats and irritated teat ends, ASC is, again,  
10 as good or better than the alternatives  
11 available.

12 Finally, available information  
13 does not suggest that the commercial products  
14 natural organic acids and homemade essential  
15 oil mixtures are all equally effective, as  
16 stated in the TR. Actually, as it states  
17 later, there is no scientific literature that  
18 supports that statement and it could easily be  
19 said that nothing suggests equal  
20 effectiveness, aside from anecdotal statements  
21 and claims.

22 In many situations, ASC is not

1       only a good alternative, it is the best  
2       alternative. It is 21st century technology.  
3       It is not your grandmother's bleach. If you  
4       look at the evaluation criteria on this  
5       substance and compare it with what is  
6       available now, this substance is as good, if  
7       not better than everything currently  
8       available.

9                   CHAIR STONE: Thank you, Dan.  
10       Calvin?

11                   SECRETARY WALKER: Dan, thanks for  
12       your comments. Could you repeat again for the  
13       Livestock Committee one or two reasons why we  
14       should reconsider their deliberations this  
15       evening?

16                   MR. GIOCOMINI: While you did an  
17       excellent job at pulling a lot of the facts  
18       that were available from the Handling  
19       Committee recommendation and the 2009 TR,  
20       there is a number of other dairy farm on-the-  
21       farm, in-barn situations where the current  
22       teat dip TR for livestock is just completely

1 deficient. It should -- you either need to --  
2 I ask you to reconsider it or pull it back.  
3 And if there is no money to get a new TR, at  
4 least somehow do the effort, do the work and  
5 see what those options are.

6 CHAIR STONE: Wendy.

7 MEMBER FULWIDER: Will you be  
8 sharing your petition?

9 MR. GIOCOMINI: I have it  
10 available. I only have one copy but yes, I  
11 have it available.

12 CHAIR STONE: Great. Thank you,  
13 Dan.

14 MR. GIOCOMINI: Thank you.

15 CHAIR STONE: Ann Mosness to the  
16 podium. Ann, correct me on the pronunciation  
17 and Jim Pierce on deck.

18 MS. MOSNESS: Thank you. And yes,  
19 that is correct.

20 Ann Mosness. I have commercially  
21 fished for nearly 30 years in Alaska and  
22 sometimes in Washington State. It was sort of

1 an accidental occupation, since there were no  
2 sons in the family. But that is pretty  
3 typical farm families, too, is that if you  
4 have a family business, you fall into it.

5 Now Alaska manages its fisheries  
6 for sustainability. It is written into their  
7 State Constitution. The only thing that  
8 Alaska does is it is very inefficient in its  
9 salmon harvest. The license holder has to be  
10 onboard. Consequently, I fished until I was  
11 eight months pregnant. I have fished on  
12 crutches. I could not deal with a herniated  
13 disc in my neck and so, in 2001, I was  
14 actually flying to Minneapolis for a position  
15 with the Institute for Agriculture and Trade  
16 Policy and I got a call that morning that my  
17 boat had just burned in Alaska. So, I did a  
18 career change. I also received a Food and  
19 Society Policy Fellowship.

20 So, I have spent many years  
21 learning about farming and learning about the  
22 similarities that the farm families have with

1 fishing families. And I would like to share  
2 with you a little bit more about fishing  
3 because you want to make some decisions that  
4 could almost be a nail in the coffin to my  
5 businesses and to the families that harvest  
6 our wild seafoods.

7           Because you're looking at marine  
8 aquaculture and possibly certifying it as  
9 organic. That would be like certifying hog  
10 farms. The major problem with marine  
11 aquaculture is that nothing is contained. The  
12 pollution, the pathogens, the parasites, they  
13 flush right from the cages. These cages  
14 cannot confine fish and these have a huge  
15 impact on natural resources, the natural  
16 behaviors of these highly migratory fish, the  
17 salmon, they are exuberant when they are in  
18 the waters.

19           You are considering allowing feed  
20 to come from non-organic fish. But it's also  
21 the competition with fisheries and we have  
22 seen this. When the fish farms flooded our

1 markets with highly subsidized fish, it caused  
2 almost a complete collapse of the value of the  
3 wild fisheries. My license was \$300,000 in  
4 1995. That's why I fished on crutches,  
5 because we were making money and we had to be  
6 on the boat. Seven years later because of the  
7 flooding of the markets by farmed fish, my  
8 license was valued at \$20,000 and over that  
9 winter of 2002, I knew of three suicides.

10 So I initiated the lawsuit that  
11 required the labeling of colorants in farmed  
12 salmon and now there is some differentiation  
13 in the marketplace. There's also a huge, huge  
14 push by other industries trying to come in and  
15 doing very concentrated feedlot operations in  
16 our marine waters.

17 And I come from Washington State.  
18 We know about factory farms in our marine  
19 waters, if you learn about shrimp farming,  
20 this is geoduck farming, all those beaches and  
21 tubes stomped in. This is salmon farming  
22 right in Puget Sound. These farms in

1 Washington State allow 11 million pounds of  
2 sewage, basically, to flush into our waters.  
3 These don't contain pathogens. We've had  
4 viral hemorrhagic septicemia in our waters.

5 The industry pays zero for this  
6 sewage disposal. So while farmers are making  
7 changes to practices to make sure that the  
8 water that comes from your farms and goes into  
9 the coastal environment is clean, we're  
10 allowing polluted waters from fish farming.

11 You know about the feed issue, but  
12 let me try and really briefly, just because we  
13 have certified farmed organic fish in our  
14 markets from Europe, the Europeans don't even  
15 agree with that. The Irish organic farmers  
16 don't believe they should be certified  
17 organic. They had an association quit when  
18 their association tried to certify farmed fish  
19 as organic. This is what it is about, other  
20 industries coming into our marine waters.

21 CHAIR STONE: Thank you, Ann.  
22 Jay?

1 (Applause.)

2 MEMBER FELDMAN: Thank you, Ann.

3 Do you have a vision of an organic farmed fish  
4 scenario? Is there one that this Board should  
5 be considering? And as a follow-up to what --  
6 is it proper for the Board to evaluate  
7 materials before having that vision codified?

8 MS. MOSNESS: You know, one of the  
9 things that has concerned me is that you were  
10 getting your information from the proponents  
11 and the lobbyists for an industry. Did you  
12 hear from people from the fishing industry who  
13 were going to impacted? Even Dr. Naylor said  
14 she is the only one that was on your Advisory  
15 Committee that was not tied to the industry.

16 I mean the very first mistake is  
17 you are proceeding with something that aids an  
18 industry to go into our waters and you want  
19 to, I am sure, want to be helpful to that  
20 industry because you have been hearing from  
21 them. I think it is absolutely disastrous to  
22 take these incremental steps first before you

1 have looked at the production systems. And  
2 the one thing I would recommend is you don't  
3 allow any industry that lets its manure flush  
4 away from its operation. If you did nothing  
5 else, only look at closed containment. You  
6 wouldn't let hog farms come into city, state,  
7 or federal parks without a containment plan  
8 for manure.

9           So again, I think the one thing  
10 you could do is differentiate closed  
11 containment wherever it exists. They have  
12 bladder situations that they can  
13 experimentally use in a coastal environment  
14 where they do take out the effluence, the  
15 waste. They process it.

16           Yes, it adds cost. But why do we  
17 think that any dirty industry has the right to  
18 pollute our commons, our public coastal  
19 waters? You know you have all, all the  
20 farmers have made changes to make sure their  
21 waste, their runoff doesn't go into our  
22 coastal waters. And yet, you would consider

1 letting a dirty industry park right out there,  
2 three miles from our coastal rivers? That is  
3 under NOAA's plan. This is a NOAA photograph.  
4 That is the Department of Commerce.

5 So, we have all these competing  
6 agencies and they are hearing from the  
7 industries that want to go into our waters and  
8 utilize decommissioned oil rigs for the  
9 aquaculture industry. You know it is about  
10 bankrupting the coastal fishing industry  
11 because then you don't have resistance to open  
12 pit mining, coal trains, oil pipelines.

13 So the worst thing that could  
14 happen is somehow giving this industry your  
15 stamp of approval when you haven't really  
16 looked at the impacts.

17 CHAIR STONE: Francis.

18 MEMBER THICKE: Thank you, Ann.  
19 We get loud and clear your message about  
20 coastal aquaculture.

21 What is your opinion on closed  
22 systems like ponds and such, organic --

1 MS. MOSNESS: Well, that is what I  
2 say. If it contains the effluence, and  
3 doesn't allow interaction with the wild  
4 species, it is that exchange, these marine net  
5 pens actually are reservoirs. They amplify.  
6 It is a dense, crowded conditions. And so,  
7 any pathogens and parasites will amplify.  
8 Well, then that spreads out from the pens and  
9 they are actually attractants for the  
10 predators and for other wild species. So,  
11 this just disperses this.

12 But if you have a contained  
13 system, you know and they have some raising  
14 salmon, so that they don't -- they are not  
15 totally capable of confining everything.

16 You probably haven't heard very  
17 much from independent scientists but they have  
18 looked at the fact that the juveniles have  
19 escaped from closed containment systems. The  
20 water is not always totally filtered but it is  
21 the best. It has to get better but it is  
22 certainly the only thing you should look at.

1 CHAIR STONE: Great. Thank you,  
2 Ann.

3 MS. MOSNESS: Thank you.

4 CHAIR STONE: We are going to do  
5 two more before we break for lunch. That gets  
6 to the end of -- I think we have them  
7 segmented by Livestock Subcommittee.

8 So, Jim Pierce to the podium and  
9 we will break for lunch after Harriet Behar is  
10 finished.

11 MR. PIERCE: All right, thank you.  
12 For the record, I am Jim Pierce, Global  
13 Organic Program Manager for Oregon Tilth  
14 Certified Organic. As you know, OTCO is the  
15 best certifier, but there is precious little  
16 time to dwell on that now.

17 Since the beginning of the  
18 discussions through the NOSB Aquaculture  
19 Symposium in 2007, the repeated draft  
20 recommendations and the final NOSB  
21 recommendations for aquaculture in 2007  
22 through 2010, Oregon Tilth has been an active

1 participant challenger and supporter of the  
2 addition of organic aquaculture to the scope  
3 of the National Organic Program.

4 We are now encouraging you to move  
5 forward with discussion and voting at this  
6 meeting on the Livestock Subcommittee's  
7 recommendations for materials so that the  
8 aquaculture standards and the list of  
9 permitted substances for aquaculture can come  
10 out relatively hand-in-hand.

11 Since you have blaringly read all  
12 977 written comments, you are aware that OTCO,  
13 with some very astute and valuable comments  
14 regarding listing aquaculture materials  
15 consistently with current listings, endorses  
16 the addition of nine of the 11 materials on  
17 the docket for aquatic animal and plant  
18 production and that we have concerns about  
19 micro-nutrients in CO2.

20 Therefore in these oral comments,  
21 I would like to respectfully address some of  
22 the concerns expressed in the comments that we

1 are hearing, as well as the minority opinion  
2 included with many of the Subcommittee's  
3 recommendations.

4 Organic aquaculture has been  
5 defined. Canada and the EU have organic  
6 standards, aquaculture standards that include  
7 permitted substances and that seem to be  
8 meeting consumer expectations.

9 The NOP standards are written, and  
10 it was good to learn yesterday that they are  
11 glacially progressing through the python but  
12 without a materials list, they will be mostly  
13 useless, since these materials are essential  
14 for success.

15 The U.S. organic movement would be  
16 nowhere if the NOP standards had been launched  
17 in 2002 with nothing listed in Section 600.  
18 Aquaculture materials today might make it out  
19 of the sausage smokehouse in just a few short  
20 years, after the standards, which in many  
21 cases will be gathering dust since, again,  
22 materials like vitamins, minerals, and

1 vaccines are essential.

2 We have heard again the concerns  
3 that aquaculture in general and open nets and  
4 pens in particular are inappropriate for an  
5 organic system. To challenge the alleged  
6 ghost of this hotel, I am here to tell you  
7 that is fish poo, partner.

8 Seriously, like conventional  
9 poultry and conventional dairy, organic  
10 aquaculture producers will expose the bad  
11 practices of conventional aquaculture and  
12 concerned consumers will reward these best  
13 practitioners by raising farm-raised fish and  
14 plants with the USDA organic logo, the world's  
15 most successful eco label. We are seeing this  
16 happen in Europe and Canada, where small scale  
17 family fish farms are, once again, becoming  
18 competitive and viable.

19 In closing, there will be public  
20 comment periods for the NOP aquaculture  
21 standards and additional public comment  
22 periods to evaluate the materials on the

1 docket today to those standards.

2 Work the system. We have a system  
3 that works. It doesn't work perfectly but it  
4 works good and they need not be enemies.

5 For the record, while we do not  
6 agree with every NOP decision and every NOSB  
7 recommendation, we do so with respect and  
8 appreciation of your efforts. We do not agree  
9 with the grandstanding showmanship and tactics  
10 of divisiveness and attack which are toxifying  
11 your collaboration. We have confidence in the  
12 NOP and in the NOSB and in the system. We are  
13 happy to see and anxious to assist the  
14 encouraging momentum of the program. Even  
15 while we are not on the same side, we are on  
16 the same team, advancing a common cause and a  
17 darn good one. La dolce vita. Molte grazie.

18 (Applause.)

19 CHAIR STONE: Very good. Zea?

20 MEMBER SONNABEND: Thank you, Jim.

21 Could you address the points raised by the  
22 previous commenter about the fish in the net

1 pens in the ocean not being able to express  
2 their natural behaviors and being like  
3 confinement feedlots and inputs and waste  
4 escaping into the open ocean, and how that  
5 would ever be quantified as organic?

6 MR. PIERCE: Just that. Okay,  
7 yes, I can and I hope it's adequate. It is a  
8 big topic.

9 This discussion has been going on  
10 for over ten years. And just like what you  
11 are hearing with the methionine, we are  
12 catching up with discussions that have  
13 happened ten years or longer ago. So this was  
14 definitely a concern.

15 The comparison of salmon with  
16 their natural behavior is certainly  
17 legitimate. However, I am pretty sure we can  
18 certify organic buffalo now today. And they  
19 are going to be in some sort of a confinement  
20 system or a contained system, I would hope.

21 As far as the effluent from the  
22 net pen system, that is a good point. Because

1       there is definitely a problem. Just like  
2       conventional poultry and pork, there is bad  
3       things going on. Make a legitimate standard,  
4       set a bar, let the curious monkeys that are  
5       the entrepreneurs of the organic industry  
6       figure out how to meet that bar.

7                   My understanding is that the  
8       proposal for net pen aquaculture includes  
9       mandatory, integrated nutrient management. In  
10      other words, something has to be absorbing  
11      that manure, those nutrients.

12                   And I forget if there was another  
13      point to your question, Zea. No? Good.

14                   CHAIR STONE: Francis, did that  
15      get yours? Okay. Thanks.

16                   Jay?

17                   MEMBER FELDMAN: Could you define  
18      glacially moving, please?

19                   MR. PIERCE: Well it was a bit of  
20      a mixed metaphor because it is glacially  
21      moving through a python. But, I am glad you  
22      noticed it and called me out on it. It is

1 artistic license.

2 CHAIR STONE: Thanks, Jim. We  
3 appreciate it.

4 Harriet, I would appreciate it if  
5 you would close it out for lunch.

6 MS. BEHAR: Okay, I am Harriet  
7 Behar. I am with the Midwest Organic  
8 Sustainable Education Service, otherwise known  
9 as MOSES. And we interact with thousands of  
10 organic farmers on a yearly basis.

11 I want to talk a little bit about  
12 systems. And systems as we work here,  
13 reviewing organic standards and materials, and  
14 systems out on the farm.

15 So, first I want to say to the NOP  
16 that I hope that you are listening to the many  
17 unhappy voices about the changes to Sunset and  
18 to the policy and activities of the NOSB. We  
19 may not always have an administrator who is  
20 knowledgeable and committed to organic as you  
21 Miles, in the future, and I would hate for  
22 this legacy to pass down to someone else who

1 may be would not have as a heartfelt promotion  
2 of organic at the helm.

3           Also, I want to talk a little bit  
4 about the organic label and that we have --  
5 when we label things as organic, we have a  
6 little five percent that we know is not  
7 organic. And I think that we here in the room  
8 tend to focus so much on that five percent and  
9 forget about the 95 percent. And I hate the  
10 idea that the consumers and the farmers that  
11 are so emotionally tied to organic will see  
12 what we discuss here and lessen their trust  
13 and support of organic due to our focus so  
14 much on the five percent that might be  
15 problematic.

16           I want to also talk about  
17 methionine. Again, where is the system in  
18 this? There is an ATTRA publication, which I  
19 can pass around that was put out in 2010 that  
20 has got a long list of methionine  
21 alternatives. There is skim milk, there is  
22 dried whey, there is protein from potatoes.

1 There is a lot of opportunities here. And I  
2 think that this reliance on a corn and  
3 soybean-based diet for poultry has actually  
4 gone out into our larger system, where we have  
5 difficulty with our grain producers having a  
6 good crop rotation because they are producing  
7 corn and soybeans for the poultry.

8 So, I mean, it is a larger  
9 systems-based issue here and I think that the  
10 NOSB, through your directive, can encourage  
11 people to be growing more in a rotation. I  
12 challenge the Feed Mill and the Methionine  
13 Task Force to really be doing some more work  
14 on these alternative items. You know  
15 sunflower meal was talked about, sesame meal.  
16 There is a lot of items here that can be done  
17 and are being done organically.

18 But that said, I do support what  
19 the Livestock Committee has done. I am very  
20 concerned about animal welfare and I want to  
21 tie that in as well.

22 So, we want the animals to be

1 outside. I am concerned and I am hoping that  
2 we will see soon some animal welfare  
3 standards. I know that my farmers said, not  
4 that MOSES has farmers, or a lot of people who  
5 talk to MOSES are concerned about that organic  
6 is losing its recognition as the gold standard  
7 and that there isn't animal welfare. They  
8 consider organic possibly being the CAFO of  
9 poultry.

10 I also know that there is not  
11 enough organic eggs out there. So, I would  
12 like the future organic farms to be truly  
13 given the direction to give outside access to  
14 their birds. I have seen it done on large  
15 farms and it can be done. But they can't take  
16 failed conventional operations and --

17 CHAIR STONE: You've got prize  
18 number two right there.

19 Thank you. Questions for Harriet?  
20 Jennifer.

21 MEMBER TAYLOR: Thank you. Could  
22 you continue your -- did you complete your

1 thought or would you continue?

2 MS. BEHAR: Yes, it is a  
3 conventional operation, where we just put  
4 chickens in the house and feed them organic  
5 feed. That is not an organic system.

6 CHAIR STONE: Thank you for that  
7 but thank you for respect for the stop light.

8 Okay, Harriet, thank you very  
9 much.

10 (Applause.)

11 CHAIR STONE: We are going to  
12 break. I have got 12:33. So, let's say 1:45  
13 back here and Rebecca Willows is first and  
14 Lynn Coody is second. Please be prompt,  
15 because that we are going to start promptly at  
16 1:45.

17 (Whereupon, at 12:33 p.m., a lunch  
18 recess was taken.)

19

20

21

22



1 Remind everyone about the reception tonight.

2 It is just a couple of blocks away that NCAT  
3 and TOFGA and a few others are hosting for  
4 everyone in attendance to the meeting.

5 Anything else housekeeping? Very  
6 good. So, thank you all for coming back  
7 promptly and Rebecca, you are up.

8 MS. WILLOWS: All right. Hi. My  
9 name is Rebecca Willows and I am commenting on  
10 behalf of the Organic Produce Wholesalers  
11 Coalition, OPWC, which is comprised of ten  
12 businesses that distribute fresh organic  
13 produce to retailers, restaurants, and other  
14 customers across the United States and  
15 internationally.

16 I am a certification coordinator  
17 at Organically Grown Company headquartered in  
18 Eugene, Oregon, which is a member of the OPWC.  
19 OGC is also a supporting member of the  
20 Accredited Certifiers Association. OPWC has  
21 given written comments on several topics but  
22 I am addressing the Sound and Sensible

1 Initiative. The OPWC appreciates the work  
2 that both the NOSB and NOP are doing on the  
3 Sound and Sensible Initiative. We believe  
4 that the goals of streamlining procedures and  
5 clarifying regulations will play an important  
6 role in creating a better system.

7 I would like to share the  
8 following four points on the Sound and  
9 Sensible Initiative. First, real-time  
10 operator database from the NOP. The NOP  
11 database is only updated once a year and is,  
12 therefore, not reliable for verification of  
13 certification status. As a result, all of the  
14 OPWC members are burdened with the task of  
15 maintaining our own complex databases for  
16 verifying certification. Real-time  
17 information on operator certification status  
18 and accurate product lists on certificates are  
19 the number one changes that would make the  
20 regulatory environment both more sound and  
21 sensible. This change would save time, money,  
22 ensure integrity, and allow the organic

1 marketplace to flow in a more predictable and  
2 efficient manner.

3           Second, single standardized  
4 formats for certificates. Currently, each  
5 organic certifier uses its own format for its  
6 certificate. Especially problematic for us is  
7 that they have different dates, sometimes with  
8 different definitions. We suggest the NOP  
9 require a valid until date on certificates.

10           Permanent certificate numbers  
11 should be assigned to each certified party and  
12 serve as a constant reference number on the  
13 NOP website.

14           Third, the NOP instruction on 2603  
15 on organic certificates. We applaud the NOP's  
16 recent revision to NOP 2603 instruction on  
17 organic certificates and we strongly support  
18 inclusion of the reference to 205.501(a)(21)  
19 which requires mandatory implementation of the  
20 elements of the instruction by certifiers.  
21 However, we feel the NOP's use of the term  
22 should and must on 2603 need clarification.

1 We are concerned that the framing points with  
2 should or must will allow an opening for  
3 certifiers to claim that these points are not  
4 subject to mandatory implementation.

5 OPWC urges the NOP to include this  
6 new instruction at its annual training for  
7 other ACA agents in order to ensure that all  
8 ACAs implement the changes as soon as  
9 possible.

10 So, now on the fourth, sound and  
11 sensible investigations. When OPWC members  
12 have made formal complaints to the NOP, we  
13 have found the current process of handling  
14 compliance investigations is slow and lacks  
15 transparency. Long time frames for resolving  
16 complaints and other enforcement issues  
17 significantly impact commerce in the fresh  
18 produce industry. Purchase and sales  
19 decisions are put into limbo. The product may  
20 become spoiled or enter and run through the  
21 market before the NOP's compliance system  
22 takes effect. The OPWC appreciates the NOP's

1 recent efforts to reduce the time needed to  
2 close enforcement actions and we urge the  
3 agency to continue to monitor and report on  
4 the activities of the NOP's compliance and  
5 enforcement division, so that the time frames  
6 for enforcement activities can be further  
7 shortened, thus, making them more relevant to  
8 the organic marketplace.

9 CHAIR STONE: Very good. Thank  
10 you, Rebecca. Questions, comments? Nick.

11 MEMBER MARAVELL: Yes, Rebecca,  
12 about your second point, valid until. If  
13 there were a legal problem with doing that,  
14 and I won't go into the reasons for that,  
15 would something along the lines of inspected  
16 through with a date, let's say inspected  
17 through December 31, 2014, would that be  
18 sufficient?

19 There may be legal issues raised  
20 with the ability to revoke and affect a  
21 certificate with an expiration date, as  
22 opposed to another action.

1 MS. WILLOW: Right. Well, there  
2 is two points on that. One, we would like to  
3 see either a valid or a certificate that  
4 expires but the certified entity may not, so  
5 that there are two separate ways of saying  
6 okay, the certificate is no longer valid. The  
7 certifier is still certified.

8 Secondly, the inspection date is  
9 not on the certificate currently. And that,  
10 alone, would greatly help the marketplace  
11 because it is the only date that has any  
12 reference in the rules for a time frame for  
13 the next action.

14 MEMBER MARAVELL: Well, as long as  
15 you are aware of the issues, I think you will  
16 be able to work that through.

17 MR. McEVOY: Yes, just a point of  
18 clarification on that. The way that the rules  
19 are written is that certification is valid  
20 until it is surrendered, suspended, or  
21 revoked. There is an NOSB recommendation from  
22 a few years back that requests that

1 certificates expire. So, it is one of dozens  
2 of NOSB recommendations that we have not fully  
3 addressed. The intent is is that we will go  
4 back and do some rulemaking to have those  
5 certificates expire so that they are valid for  
6 a yearly basis. But that requires a  
7 rulemaking action.

8 But at this point, certificates  
9 are valid until they are surrendered,  
10 suspended, or revoked.

11 MEMBER MARAVELL: So you think you  
12 can legally put an expiration date that would  
13 not violate your current policy or you would  
14 have to change policy.

15 MR. McEVOY: Right, you would have  
16 to change the regulations in order to put that  
17 expiration date on there.

18 So, the organic certificate  
19 instruction clarifies what we are saying, the  
20 requirements for certifiers to issue that. We  
21 also intend to, we would like to move to a  
22 unified organic certificate so they all look

1 the same. So, that is part of our information  
2 technology initiative for improvements.

3 CHAIR STONE: Great. Thank you  
4 very much.

5 Lynn Coody to the podium and Bill  
6 Denevan on deck.

7 MS. COODY: Hi. My name is Lynn  
8 Coody and today I am speaking on behalf of the  
9 National Organic Coalition, an alliance of  
10 organizations representing farmers,  
11 environmentalists, other industry members and  
12 consumers working together to ensure the  
13 integrity of National Organic Standards.

14 Today, I would like to comment on  
15 Sound and Sensible. In response to the  
16 discussion document on this topic that was  
17 prepared by the CACS for the fall 2013 NOSB  
18 meeting, NOC submitted specific ideas for  
19 improving NOP certification and accreditation  
20 programs. Our paper discusses a range of  
21 topics, including improving OSP forms,  
22 training inspectors and auditors, upgrading

1 methods for evaluating materials, and  
2 suggestions about the records required of  
3 organic farmers and handlers.

4 The primary focus of NOC's  
5 comments was the need for oversight systems  
6 that provide proactive, continuous quality  
7 assessments at every level of the regulatory  
8 system of the U.S. organic industry.

9 On this topic of oversight, NOC's  
10 comments introduce a concept of a National  
11 Organic Quality System as a way to frame the  
12 discussion of the Sound and Sensible  
13 Initiative. The concept focuses on management  
14 of the multiple levels of the NOP regulatory  
15 systems as an integrated whole. We believe  
16 that this integrated view affords  
17 opportunities for redistributing burdens and  
18 responsibilities of quality assurance, so that  
19 they are commensurate with the level of  
20 authority at each level of the oversight  
21 system established by OFPA. In turn, this  
22 allows both increased efficiency and increased

1 effectiveness, which boils down to Sound and  
2 Sensible.

3           This is a complex concept that is  
4 better understood by reading our comments.  
5 But for now, here is an example of how this  
6 concept plays out in a practical way. The  
7 foundation of the National Organic Quality  
8 System is the certified operation of farm or  
9 handling operation that is overseen by an  
10 accredited certification agent. NOC believes  
11 that the level of paperwork used to document  
12 this relationship has become overly burdensome  
13 on farmers and handlers. In response, some  
14 certifiers have implemented systems that allow  
15 operators the option of maintaining the  
16 working copy of their OSP as an electronic  
17 document on the certifiers' computer network.  
18 This supports easier electronic updates, while  
19 ensuring that the operator and certification  
20 staff are using the same information. This is  
21 an example of rebalancing the responsibility  
22 for management of a quality system

1 documentation from operators to certifiers.  
2 In this case, the system is not only more  
3 effective and more efficient. It is also more  
4 equitable. This same principle applies at the  
5 next level up of the National Organic System,  
6 where NOC has identified a lack of continuous  
7 oversight of the NOP as an important  
8 impediment to the principles of Sound and  
9 Sensible. Failure to implement the peer  
10 review panel and oversight mechanism required  
11 by both OFPA and NOP's regulation has resulted  
12 in systems which are noncompliant with Section  
13 509 of NOP's own regulation. And this has  
14 been shown in the results of internal audits  
15 and other audits that have been done by the  
16 Office of Inspector General and the National  
17 Institute of Standards and Technology, which  
18 have documented problems related to this.

19 So in conclusion, Organic  
20 Regulatory Systems must function as a  
21 practical marketing tool for organic farmers,  
22 handlers, and other stakeholders, who rely on

1 the clarity and validity of the organic claim  
2 in the marketplace.

3 We urge you to review our written  
4 comments, which provide specific comments  
5 about how to achieve this goal and we did try  
6 to be constructive and very specific about the  
7 ideas that we provided.

8 Thank you very much.

9 CHAIR STONE: Thank you, Lynn.

10 Miles?

11 MR. McEVOY: Yes, a point of  
12 clarification there. The Office of the  
13 Inspector General did do an audit report March  
14 of 2010 had some specific findings about the  
15 USDA National Organic Program not implementing  
16 the peer review panel. AMS took some  
17 recommended actions, based on that. And OIG  
18 has closed that, based on those corrective  
19 actions that the program has taken.

20 So, we are meeting the  
21 requirements of a peer review panel. There  
22 are more things to do and we appreciate the

1 input that NOC has provided, in terms of  
2 making improvements to that whole system.

3 MS. COODY: Well, in turn, we  
4 appreciate the proactive stance that you have  
5 taken to try to improve the situation and  
6 address some of the noncompliances that were  
7 brought out by the audits.

8 Now, auditing is an opportunity to  
9 provide a very specific feedback on the  
10 quality of a regulatory system and so that has  
11 been great that you have taken corrective  
12 actions. We do look forward to having a more  
13 proactive situation with the peer review panel  
14 that addresses not only the requirements of  
15 the NOP's own regulation but also the  
16 requirement of to be compliant with ISO 17011,  
17 which is in your regulation as well. So, that  
18 is an area I think that could potentially be  
19 improved, based on the results from the NIST  
20 audit.

21 So, and I have looked forward to  
22 working with you on this more, Miles.

1 CHAIR STONE: Great.

2 MS. COODY: Done?

3 CHAIR STONE: Thank you, Lynn.

4 MS. COODY: Thank you.

5 CHAIR STONE: Bill Denevan to the  
6 podium and David Moore on deck.

7 MR. DENEVAN: Hello. My name is  
8 Bill Denevan. From '76 to 2006, I grew 120  
9 acres of organic pears and apples under the  
10 Denevan Apple and Happy Valley labels. In the  
11 '80s, I served on the Board of Directors of  
12 CCOF. I have been employed for the last 20  
13 years as California and Chili Grower Rep for  
14 Viva Terra, formerly known as CF Fresh.

15 Three years' ago, I was elected to  
16 the Board of Directors of the California Apple  
17 Commission. I represent District 2. And I  
18 just got done visiting growers that I  
19 represent in the Central Valley.

20 Although I don't put my money  
21 where my mouth is, like I did when I was a  
22 grower, I still remember that time in my life.

1 Most of the farmers I visit, they walk a  
2 financial tightrope, just like I did. The  
3 last thing that we need now is to lose the  
4 ability to borrow money from the bank and be  
5 financially successful.

6 Nothing upsets a grower more than  
7 losing its future in one year due to blight.  
8 There is no bug, no fungus, no freeze, no bad  
9 market, nor any dilemma that can destroy a  
10 grower as quick as blight can.

11 The way I see it, throwing out all  
12 the antibiotic controls for the next year and  
13 making growers experiment, instead of letting  
14 them use their currently most effective tool  
15 in their disease toolbox would be an  
16 incredibly illogical move. At the very least,  
17 we should have a chance to create a new  
18 reasonable time line so as to figuring a new  
19 effective spray regiment.

20 All the organic growers I know are  
21 honest, hard-working, salt of the earth types  
22 who strive to give organic consumers the

1     cleanest fruit they can grow. Antibiotics  
2     have been in use for 30 years in organics and  
3     applied only when necessary. Yes, we all  
4     realize there has to be other ways to kill  
5     blight. Yes, we are in the process of trying  
6     them all. Why be in such a hurry without  
7     sufficient trials and protocol? Why do we  
8     have to seriously think about being ready to  
9     jump off the cliff and have many trees dying  
10    next year? We already have enough serious  
11    tasks to deal with markets, financing, hail,  
12    labor, fertilizers, and feeding our families.

13                   The main reason for my coming to  
14    this meeting today is to let the decision-  
15    makers on the NOSB Board know that my research  
16    into the effectiveness of these highly-touted  
17    organic alternatives shows that without a  
18    doubt these new materials are not ready for  
19    prime time. Nearly all the experts I have  
20    talked to say that any non-antibiotic control  
21    is a work in progress and many more efficacy  
22    trials must be done before they can write

1 solid recommendations.

2 As we speak, in Reedley today  
3 there are over \$1,500 per acre being spent on  
4 cutting out a burning blight on over 100 acres  
5 of organic Gala and Granny. This includes  
6 three growers. On the 30 acres with the most  
7 damage, the grower religiously adhered to the  
8 copper, lime, sulfur Blossom Protect with  
9 buffer type spray regiment, currently being  
10 touted by the industry experts in Washington.  
11 His blooms had 60 percent blight on the trees.  
12 That is an incredible amount of cutting.

13 Now, he has shoot blight today.  
14 He has cut everything out of the blossoms that  
15 have been infected. Now he is getting these  
16 shoots that are dying and it is starting run  
17 down the branches. Anyway, he is using  
18 Blossom Protect and this is his second year  
19 using Blossom Protect and he has got bad  
20 blight as a result.

21 Another grower has got 75 acres of  
22 organic Gala, Asian pears. He has horrible

1 blight. He has been using Agri-Mycin,  
2 MicroShield, lime sulfur, as these chemicals  
3 are approved for this year. It is his first  
4 year doing organic and he has got less damage  
5 than the Blossom Protect guy has and he needs  
6 some more research and protocol.

7 The good thing about this proposed  
8 ban is that we are going to be able evolve  
9 some kind of good protocol.

10 In the same neighborhood, another  
11 grower, who is in transition, has 20 acres.  
12 He is spraying every three days with an  
13 alternating MicroShield and Agri-Mycin and has  
14 little damage on his 18 acres. So, he has two  
15 acres of Blossom Protect and they are  
16 terrible.

17 So, basically, what I wanted to  
18 say is that as far as I am concerned, these  
19 new products, there's 15 of them out there,  
20 blight control products that they're saying  
21 hey, you've got to try them out, they're  
22 placebos. They've got WSDA and OMRI

1       imprimaturs on them and they are not working.

2       And I think this is ridiculous.

3                   If you want to send all of  
4       California pear and apple business to South  
5       America and to Washington -- well, to South  
6       America where blight doesn't exist and send  
7       the growers of our state packing back to  
8       conventional, then don't give us our extension  
9       that we need.

10                   This year is the worst blight I  
11       have ever seen since I started farming in '76.  
12       We have had warm temperatures. The most  
13       warmest temperatures ever recorded. The bloom  
14       has not been compact and advantageous for  
15       doing Blossom Protect sprays. We have had a  
16       bloom for five weeks. The flowers on the  
17       apples have been open for too long. This kind  
18       of situation happens in California every five  
19       years and in Washington, it almost never  
20       happens. They always have adequate chill up  
21       there.

22                   Nothing has been developed for

1 warmer climates and California is not the only  
2 one. There is Pennsylvania. There is other  
3 places that have trouble, too.

4           Anyway, the California Pear and  
5 Apple Commission and the many growers have  
6 allotted big chunks of our orchards to study  
7 the problem and have been trying to use these  
8 new products that cost two to four times more  
9 than the products that we know that work. And  
10 we are certainly not ready to jump over the  
11 cliff, unless the proposed ban pushes us over.

12           That's it.

13           CHAIR STONE: Thank you, Bill.

14           Harold.

15           MEMBER AUSTIN: Bill, thanks for  
16 coming. I appreciate the concerns and the  
17 issues that the growers in California are  
18 dealing with, as well as others across the  
19 country.

20           Could you answer us, based on your  
21 personal experience in your involvement with  
22 the growers, any efficacy differences between

1 the materials in apples versus pears? And  
2 then also, do you see any difference in  
3 efficacy with materials, based off the age of  
4 a tree or is there certain varieties that are  
5 more susceptible?

6 MR. DENEVAN: That's a really good  
7 question. Let's get to the latter. Trees  
8 that are really young, they die in a hurry.  
9 Trees that are vigorous, that are well-  
10 fertilized and happy, all of a sudden they get  
11 this bacteria and they die in the same year  
12 that they get the blight.

13 Anything that is four years' old  
14 and younger, whether it is a pear or an apple,  
15 especially a Pink Lady, the blight will come  
16 in through the blossom and run. And it will  
17 run all the way down to the roots. I have  
18 seen 400 acres taken out in California from  
19 five-year-old trees that were not sprayed  
20 properly.

21 Like I said, this is not something  
22 that you can get rid of in one year. This guy

1 that used Blossom Protect last year and really  
2 he had blight, a little bit of blight last  
3 year. He had a little bit of cankers in his  
4 trees as a result of not having taken care of  
5 it last year. This year, he went to the label  
6 and beyond and what did he get? He has got 60  
7 percent of all of his spurs are dieback. And  
8 now he has got shoot blight. It is  
9 incredible.

10 Your other question was what?

11 MEMBER AUSTIN: Pears, the  
12 difference between apples and pears.

13 MR. DENEVAN: Pears are the worst.  
14 They always have a late, a delayed bloom.  
15 They never do a snowball bloom. And yes,  
16 pears die faster than apples, as a rule.  
17 Although this year, I am changing my idea on  
18 that. This year was unbelievable. I have  
19 never seen this kind of damage. And I just  
20 came out of the field. I was there last week  
21 looking at the trees and I don't even want to  
22 look at them. It is so disgusting. Because

1 I grew pears for 30 years and I know how fast  
2 you can lose branches.

3 One year, I took every single spur  
4 and shoot off of every single tree of 2,500  
5 trees and was left with just the leaders, just  
6 the basic framework of the tree, and had to  
7 regrow all the fruit. It took years to get  
8 back.

9 And that is the problem. The  
10 people that are wanting us to jump off the  
11 cliff and get rid of the antibiotics  
12 immediately, they don't understand that it is  
13 not like any other situation that has ever  
14 happened to anybody. You have to be a grower.  
15 You have to be somebody that puts your money  
16 where your mouth is. You plant a tree, it  
17 last for your whole generation, your whole  
18 life. It is different than a bug or a market  
19 thing or hail. These are all like things that  
20 could be taken care of over a year or two.  
21 But blight, once you get it, you are fighting  
22 it forever.

1                   So, any other questions about  
2 blight or the tetracycline ban?

3                   CHAIR STONE: Jennifer.

4                   MEMBER TAYLOR: Thank you for your  
5 presentation. I was just wondering. As you  
6 talk to your growers around the different  
7 areas, do you ever have conversations about  
8 different kinds of alternative management  
9 systems that they could use or should use or  
10 are using?

11                  MR. DENEVAN: Well, for one thing,  
12 every year is a little different. And if you  
13 have inoculant from the year before, that  
14 means you have a certain protocol to operate  
15 on that particular year. So, the last year,  
16 your history affects what you do now. And  
17 then your region predicts what you do.

18                  I advise people not to grow Pink  
19 Ladies because they seem to get it worse than  
20 any other variety. And I advise people to try  
21 to spray closer, when we have really hot  
22 events and it is a warm winter, I advise them

1 to get out there and spray more often.

2 As far as planting other trees and  
3 things like that, like I said, this is a long-  
4 term tree. You plant a tree, you don't go and  
5 say oh, gosh, I have got seven-year-old trees  
6 and I have to go on a whole new regiment and  
7 I will just plow it all under. It is not like  
8 growing a row crop where you can say oh, I am  
9 tired of growing this, I will grow something  
10 else or I will go fallow. This is something  
11 that you commit to for, we are talking a  
12 decade's commitment.

13 I know it is hard for people to  
14 understand that but I committed to growing my  
15 crops for 30 years. And I would build up  
16 fungus. There are so many issues. But with  
17 fire blight, trying new things is what we are  
18 all about. We were forced to. We were forced  
19 to. We were told five years ago that we had  
20 better get the heck into something new.

21 So, the biggest problem -- and  
22 this is a really good question. The biggest

1       problem really is we need pesticide  
2       manufacturers, and we need researcher, and we  
3       need cooperation of other growers who are  
4       trying different methods. We need to have a  
5       consensus of ideas developed that we can work  
6       together on, not like just hey, my time line  
7       says goodbye right now. No, that isn't the  
8       way nature works. That is not the way growing  
9       crops work. It works in a less finite kind of  
10      way. Do you hear what I am saying?

11                   CHAIR STONE: Great, thank you,  
12      Bill.

13                   MR. DENEVAN: All right.

14                   CHAIR STONE: David Moore to the  
15      podium and Alexis Randolph is on deck.

16                   MR. MOORE: Good afternoon,  
17      everybody. I am David Moore. I am a  
18      California licensed agricultural pest control  
19      advisor and qualified applicator and almost  
20      alone here today. I am here to talk about  
21      205.206(e).

22                   Section 205.206(e) is the gem of

1 organic agriculture. It is not just the only  
2 regulatory mandate for IPM. It is where the  
3 certification system affirms and enforces the  
4 goals of the NOP. It is also where the  
5 organic grower faces the very real challenges  
6 of crop protection. This point, where the  
7 grower and his or her OSP affirm the authority  
8 of the certifier and of the NOP is the crux of  
9 the integrity and longevity of organics. This  
10 is a really tall order for a really short  
11 regulation. And while 206(e) is rightfully  
12 the pride of organic regulation, it is proper  
13 and, I would say, critical for this Board to  
14 examine it and show that it is always up to  
15 that task.

16 Section 206(e) must not stifle the  
17 initiative and the ingenuity of the organic  
18 grower. It must not be interpreted in ways  
19 that hobble the growth and advance of  
20 organics. And it must become a primary driver  
21 of more organic farms, more organic acres, and  
22 of more and more affordable organic food.

1                   The word insufficient must not be  
2                   interpreted to force growers to repeat failed  
3                   practices, to forego established best  
4                   practices, or to violate other regulations,  
5                   including other parts of the NOP. In Silicon  
6                   Valley, they like to say don't let perfect  
7                   become the enemy of good.

8                   The rigors of how 206(e) is  
9                   applied on the ground must be considered  
10                  during Sunset and petition reviews. Section  
11                  206(e) is the bulwark to ensure the synthetics  
12                  on 601 are used in accordance with the goals  
13                  of the NOP and assertions that listing a  
14                  synthetic material somehow allows misuse or  
15                  abuse are disingenuous.

16                  I was taught that organic  
17                  agriculture is founded on the concept of the  
18                  farm as a system for the well-fed, well cared  
19                  for soil of its foundation. This, presumably,  
20                  is one reason certification and regulation is  
21                  rooted in a system of grower actions tailored  
22                  to that grower's farm. Systems remain stable

1 due to feedback and the grower's OSP is the  
2 organ of that feedback. Regulating organics  
3 is also a system and the NOSB is one organ of  
4 that feedback.

5 The important concerns for 206(e)  
6 are an example of that feedback, as stated in  
7 the Subcommittee document. And I want to  
8 thank the Board for showing the courage to  
9 address this. This board should be gravely  
10 concerned by the indifference that 206(e)so  
11 often faces. A review of 206(e)should be a  
12 system of ongoing feedback with a goal  
13 elevating 206(e) to its proper place as the  
14 beacon or organic regulation.

15 The document before you today is a  
16 very important step but it has its  
17 shortcomings. It raises the issues of public  
18 misperception and poorly informed stakeholders  
19 and notes how these issues sap NOSB resources  
20 and distract from the tasks at hand, yet there  
21 is not express call to address this.

22 Ongoing review of 206(e) should

1 include focused efforts to eliminate these  
2 persistent problems. The incredibly  
3 widespread misperception that organics are  
4 somehow free of chemical controls is  
5 disgraceful. And it is a discredit to the  
6 diligence of the organic grower and the  
7 industry as a whole. It is an intellectual  
8 dishonesty and it sullies the reputation of an  
9 industry that professes to pride itself on the  
10 transparency.

11 One duty of the organic  
12 stakeholder is to challenge the misinformed  
13 and to educate the uniformed. And the Board's  
14 review of 206(e) should explicitly address  
15 that duty, not merely acknowledge it.

16 I challenge this Board to act  
17 decisively to try to resolve all the issues  
18 identified in the Subcommittee document.  
19 Thank you.

20 CHAIR STONE: Very good. Thank  
21 you, David. Questions, comments?

22 MR. MOORE: Thank you.

1 CHAIR STONE: Very good. Thank  
2 you. I've always wanted to know who made sure  
3 that crop rotation was 205.205. I just think  
4 that is great.

5 (Laughter.)

6 CHAIR STONE: Okay, Alexis is to  
7 the podium and Pat Kane is on deck.

8 MS. RANDOLPH: Okay, good  
9 afternoon everybody. My name is Alexis  
10 Randolph and I am representing QAI and NOP  
11 Accredited Certification Agency. We are also  
12 a member of the Accredited Certifiers  
13 Association and a proud participant in their  
14 Task Force meetings.

15 I am here to speak to you about  
16 the discussion document on crop management,  
17 specifically 205.206(e). QAI worked with the  
18 ACA to submit written comments and we also  
19 submitted additional comments directly. The  
20 discussion document claims there was  
21 uncertainty and variability in the application  
22 of the requirements under 206(e). I find this

1 statement puzzling.

2 All NOP certification agents  
3 undergo rigorous accreditation audit and  
4 mandatory annual NOP training to ensure that  
5 there is no variability among certifiers.  
6 Additionally, as a participant in the  
7 Accredited Certifiers Association, this allows  
8 us to share best practices and receive peer  
9 reviewed feedback on certification procedures.  
10 The heart of the discussion document appears  
11 to be in question number one. What activities  
12 or practices do you require the applicants and  
13 certified operations in their OSP with respect  
14 to compliance with 206(e)? The answer is in  
15 the regulation itself. A full reading of 206,  
16 bullets (a) through (d) outlines numerous  
17 preventive practices, such as crop rotation,  
18 plant species selection, mechanical and  
19 physical methods to control pests, nutrient  
20 management practices and so on.

21 Bullet (e) clearly says that when  
22 preventative practices identified under

1 bullets (a) through (d) are insufficient, then  
2 and only then may substances on the National  
3 List be used.

4           Certifiers are not uncertain about  
5 how to read that section of the regulation or  
6 how to verify preventative practices are  
7 implemented. Please read the comments by the  
8 ACA and QAI for more detailed information on  
9 the exact contents of farm organic system  
10 plans, supporting records that are maintained,  
11 inspection procedures, including visual  
12 observations and in-depth auditing of records,  
13 all of which confirm preventative practices  
14 are being implemented and are the foundation  
15 of a good organic system plan.

16           Thank you very much.

17           CHAIR STONE: Thank you, Alexis.

18           Questions? John.

19           VICE CHAIR FOSTER: Thank you,  
20 Alexis. I know you can just speak for QAI.  
21 I don't want to ask you to speak for all ACAs  
22 everywhere. But for QAI, would you find

1 sufficient evidence that an operator is  
2 complying and is that embedded into some sort  
3 of format in the OSP template?

4 MS. RANDOLPH: Sure. In our  
5 written comment, we give some examples of what  
6 is in the OSP that the farmers have to submit  
7 and it includes a variety of information,  
8 everything from what is their crop rotation  
9 plan going to be, which changes from year to  
10 year; what is their cover crop going to be,  
11 especially if it is a perennial system. We  
12 ask detailed questions about their integrated  
13 pest management, in terms of biologics and the  
14 varieties of pest pressures that they are  
15 receiving on farms.

16 So, it is a very complex question  
17 to answer but it is being fully addressed  
18 throughout the mechanism of the organic system  
19 plan.

20 And then on final inspections are  
21 not only auditing records, which is very  
22 important in terms of looking at inputs that

1 are being purchased and harvest records and  
2 planting records, but they also did visual  
3 observations of the field, walking the  
4 borders, looking at the buffers, looking at  
5 the overall botanics that are on the farm and  
6 promoting good pest management, et cetera.

7 So, it is a very complex subject  
8 but it is one that we have been doing for  
9 years in the organic industry. It is the  
10 foundation of organic farming.

11 CHAIR STONE: Thank you, Alexis.  
12 Thanks for all your work and for being here.

13 MS. RANDOLPH: Okay, thank you.

14 CHAIR STONE: Pat Kane to the  
15 podium and Jessica Walden on deck.

16 MS. KANE: Hi, everyone. I am Pat  
17 Kane. I am the coordinator of the Accredited  
18 Certifiers Association. I would like to thank  
19 the Board for all the work that you do and  
20 providing our opportunity for comments.

21 I also would like to take this  
22 opportunity to thank the National Organic

1 Program for the continued efforts on guidance  
2 and instructions for ACAs. It is very  
3 helpful.

4 ACA submitted comments to the CACS  
5 document, the request for NOP's clarification  
6 and guidance on retail compliance and  
7 certification. We thought the document was  
8 great and supported it. We like the ideas of  
9 additional education and outreach for  
10 retailers in the form of guidance from NOP.  
11 We also supported the Subcommittee's request  
12 for clarification from the National Organic  
13 Program as it applies to retailers.

14 The clarifications regarding  
15 record keeping requirements for exempt and  
16 excluded operations, clarification regarding  
17 whether an exempt or excluded retail  
18 establishment may sell products off-site,  
19 including online sales, and a clarification on  
20 labeling requirements in 205.308, 309, and  
21 310.

22 In particular, ACA requested

1 clarification regarding the term certified  
2 facility that appears in 205.308 and  
3 205.309(b). Some ACA's interpret the language  
4 in these sections prepared in a certified  
5 facility as referencing the retail food  
6 establishment. Some interpret the wording as  
7 where the product was originally produced and  
8 some believe it refers to the certified  
9 handler.

10 So, clarification is needed, since  
11 there are restrictions on the use of the seal  
12 and the certifier logo, depending upon which  
13 party is certified. So, we would really like  
14 some clarification on that.

15 Thank you.

16 CHAIR STONE: Thank you, Pat.

17 Questions? Very good. Thank you very much  
18 for your work that you do in helping the  
19 certifiers.

20 Jessica Walden to the podium and  
21 Charlotte Vallaeys on deck. Welcome, Jessica.

22 MS. WALDEN: Hi. Thank you. My

1 name is Jessica Walden from QAI. I am the  
2 Technical Senior Reviewer and sometimes  
3 inspector, supervisor of the reviewers. I  
4 also grow organic homo sapiens, currently. It  
5 is a difficult process.

6 QAI is an accredited certifier and  
7 we are an active member of the Accredited  
8 Certifiers Association. This is a forum where  
9 certifiers work together, even though we are  
10 competitors. We work together to reach  
11 consistency of how we interpret and implement  
12 the organic regulations. And we know that we  
13 are working towards the same cause, to protect  
14 organic integrity, the label, the consumer,  
15 the organic operator. I worked in the organic  
16 industry, both in the U.S. and Australia for  
17 over 18 years and I have only seen a  
18 strengthening of organic requirements, the  
19 organic regulations, and I have seen a  
20 strengthening of certification and inspection  
21 staff during that time.

22 The NOP has also only gotten

1 better through much more transparency, open  
2 dialogue, and by providing more guidance to  
3 certifiers and operators and consumers. So,  
4 I wanted to say thank you to the NOP. And I  
5 wanted to say thank you to the NOSB as well.  
6 Your work is very much appreciated and I know  
7 you will continue to do good work. So, thank  
8 you.

9           So why am I here? I am going to  
10 talk about glycerin, actually. This is going  
11 to be quick. So, as a certifier, it is not my  
12 job to argue for or against the listing or  
13 delisting of a specific material. However, we  
14 are always supportive of the development or  
15 organic alternatives for items on the list.  
16 But I can report what I see are the challenges  
17 for when there are changes. And hopefully,  
18 they will be considered during deliberations  
19 and when a final decision is made.

20           So glycerin is currently on the  
21 National List as a non-agricultural synthetic.  
22 We know it can be produced in several

1 different ways as is summarized in the  
2 Handler's Committee's proposal and they  
3 include alkaline saponification and microbial  
4 fermentation, which both could be carried out  
5 according to the regulations and materials on  
6 the National List.

7 Glycerin is used in a wide variety  
8 of food and personal care products that are  
9 certified organic. And we have heard the  
10 challenges, and those include it is still  
11 uncertain about the food-grade quality of the  
12 organic glycerin produced currently.

13 Glycerin is also widely used in  
14 natural flavors and natural colors. And those  
15 natural flavors and natural colors are not  
16 organic. And they are often produced for the  
17 mainstream clientele and organic makes up a  
18 small percentage of the market. So, in terms  
19 of those manufacturers using organic glycerin,  
20 there might be some time required for them to  
21 start making those changes.

22 I really appreciated Bill Wolf's

1        comments because he did identify these  
2        challenges and he also proposed some  
3        solutions.  And he was speaking on behalf of  
4        the petitioner.  So, that really says  
5        something.

6                    You know he talked about  
7        transitional solutions implementing the  
8        commercial availability clause, initially, and  
9        also tweaking the language of the annotations  
10       as well to sort of take into account some of  
11       these challenges.

12                   Gwendolyn from OTA also touched  
13       upon the difficulty that certifiers face when  
14       evaluating whether the material is  
15       agricultural, non-agricultural, synthetic,  
16       non-synthetic.  And so until we get that  
17       guidance from the NOP, if we are looking at  
18       glycerin that is going to be used in a made  
19       with product, certifiers might be assessing  
20       those types of glycerin in different ways.

21                   So, thank you.

22                   CHAIR STONE:  Thank you, Jessica.

1 Questions, comments? Very good. Thank you  
2 very much.

3 Charlotte Vallaeys is up next and  
4 Will Fantle is on deck.

5 MS. VALLAEYS: Good afternoon. My  
6 name is Charlotte Vallaeys. I am with  
7 Consumer Reports in our Policy and Action Arm  
8 Consumers Union. We are also part of the  
9 National Organic Coalition. We believe in the  
10 unique value and critical role of the NOSB and  
11 we are concerned with the recent disregard  
12 from the USDA for this important role and  
13 value of the Board.

14 I work for the Food Safety and  
15 Sustainability Center at Consumer Reports.  
16 Food safety and sustainability are  
17 interconnected and our goal is to see the  
18 entire food landscape change. Organic is part  
19 of that and we want to see this label and the  
20 system of agriculture that is behind it grow  
21 and thrive but it needs to grow in a  
22 meaningful way.

1           The growth of the market depends  
2           on the standards staying strong, aligning with  
3           consumer expectations. In that way, please,  
4           don't disregard or diminish in any way the  
5           importance of consumers. This is a \$30  
6           billion industry and let's not forget where  
7           those \$30 billion come from: consumers who  
8           are willing to pay more because they expect  
9           more.

10           We responded to the NOSB's  
11           research priorities request for information on  
12           consumer expectations with a comprehensive  
13           nationally representative survey. We hope you  
14           will use the results in your deliberations.

15           Before I address NOSB agenda  
16           items, we noted that the USDA states, in  
17           organic promotional materials outside on the  
18           table, that organic chickens are granted year-  
19           round access to the outdoors. This is also  
20           what consumers expect. Yet, we know that this  
21           isn't happening and there are no specific  
22           standards. We urge the NOP to move forward

1 with animal welfare standards and enforce the  
2 existing rule requiring outdoor access. We  
3 also urge the USDA to prohibit the use of  
4 antibiotics throughout the entire lifespan of  
5 organic chickens. We have survey data on that  
6 as well.

7 As with many synthetic materials,  
8 we are concerned with allowing ammonium  
9 hydroxide as a broiler water additive and have  
10 submitted detailed comments. In milk  
11 pasteurization, it would actually come in  
12 direct contact with organic milk. Ammonium  
13 hydroxide is a toxic substance and we think  
14 you should reject the petition.

15 You have our comprehensive  
16 comments on ancillary substances. The  
17 National List is for single substances, not  
18 formulated multi-ingredient products. Non-  
19 organic or artificial substances used in a  
20 formulation must be either organic or on the  
21 National List.

22 We believe methionine is the

1 poster child for how Sunset has failed, for  
2 how materials, when they stay on the list  
3 indefinitely, discourage the development of  
4 natural commercially-available alternatives.

5           Regarding Sunset, the original  
6 authors of OFPA in Congress have already  
7 publicly urged you to reverse this policy  
8 change, saying it conflicts with both the  
9 letter and the intent of the statute. We  
10 agree and, according to our survey results, so  
11 does the vast majority of consumers.

12           We want to see the organic  
13 industry grow and thrive. Consumers turn to  
14 organic because it is an alternative to the  
15 largely unregulated conventional food system.  
16 Strong standards that meet consumer  
17 expectations are the foundation of the organic  
18 label and must be protected and preserved.

19           Thank you.

20           (Applause.)

21           CHAIR STONE: Very good. Thank  
22 you, Charlotte. Questions? Thank you very

1 much. Well done.

2 Will Fantle to the podium and Troy  
3 Aykan on deck. Welcome, Will.

4 MR. FANTLE: Thank you. My name  
5 is Will Fantle. I am the Co-Director of the  
6 Cornucopia Institute. We have more than  
7 10,000 members scattered across the country  
8 and we believe we also have the largest number  
9 of certified organic farmers of any other  
10 comparable organization. We aim to bring  
11 their voices to this meeting, to share their  
12 concerns with good food consumers who want to  
13 support their farmer heroes.

14 For the past two days, you have  
15 heard a lot of concern and profound  
16 expressions about the changes that have been  
17 made to Sunset and other authority concerns  
18 with the NOSB. I understand that when the  
19 USDA brought the members of the NOSB to  
20 Washington last February for what I will call  
21 reorientation, reduction about their roles and  
22 duties, they were told on more than one

1 occasion to stay in your lane. Stay in your  
2 lane.

3 The reality is that the USDA has  
4 merged into the NOSB's lane, squeezing and  
5 minimizing the space you were given by  
6 Congress with the Organic Foods Production  
7 Act, OFPA.

8 Perhaps we shouldn't be surprised,  
9 after all, that the USDA told Congress that  
10 they didn't want the responsibility for  
11 administering the new law. Michael Sligh, the  
12 first Board Chair of the NOSB appropriately  
13 called this a shotgun marriage yesterday in  
14 his remarks.

15 Aside from Sunset, I want to draw  
16 your attention to a couple of highlighted  
17 paragraphs from OFPA. The section of the law,  
18 the first highlighted section, authorizes the  
19 Board to hire a staff director. We believe  
20 that Miles is fulfilling this function. We  
21 also believe that the power dynamic between  
22 the NOSB and the USDA would be significantly

1 different if this section of the law was being  
2 adhered to.

3           The second highlighted section  
4 deals with who handles and authorizes TRs.  
5 The Board, you have got the power who is in  
6 whose lane. Some of you may be familiar with  
7 the Italian-American philosopher Tony Soprano.  
8 When his business associates complained about  
9 this strong arm tactics, his response was:  
10 "What you going to do about it?" Well, we are  
11 going to do something about this. We are  
12 likely going to court. This power grab on  
13 Sunset and NOSB authority cannot and will not  
14 stand.

15           I also want to update you on a  
16 development dealing with organic eggs. I have  
17 talked about this before. This is an  
18 operation in California that was marketing  
19 their eggs with this type of packaging from  
20 this type of facility. They were taken to  
21 court by an animal rights legal defense fund  
22 organization because of the deceptive

1 packaging. They won. That packaging is no  
2 longer in use. So, we have animal welfare  
3 organizations enforcing welfare standards and  
4 many consumers of organics believe that this  
5 image is really what they are getting.

6           Lastly, I want to mention our  
7 extreme disappointment with the rule released  
8 on the reauthorization of carrageenan by the  
9 USDA. This Board appropriately attached a  
10 restriction to that reauthorization in the  
11 form of an annotation. And that annotation  
12 prohibited the use of carrageenan in infant  
13 formula. The sanitation was missing from the  
14 final rule issued by the USDA. It is  
15 outrageous. It is unacceptable. We are  
16 looking into this and likely will be  
17 challenging that.

18           The last little piece I want to  
19 mention is our intention to develop a  
20 scorecard going forward, just like we have --  
21 here we go -- thank you.

22           CHAIR STONE: Thank you, Will. We

1 are getting some good ties on that stopping at  
2 the light. I appreciate that. We have got  
3 three right now. So, Michelle, we will have  
4 to come up with some more prizes.

5 Questions for Will? All right.  
6 Thank you very much.

7 Troy Aykan to the microphone and  
8 Cheryl VanDyne on deck.

9 MR. AYKAN: Good afternoon. My  
10 name is Troy Aykan. I am a food scientist and  
11 a lawyer with Hain Celestial Group. I also  
12 teach part-time food laws and regulations at  
13 Catholic Pomona and Chapman Universities.

14 We wish to strongly support the  
15 relisting of gellan gum on 205.605(a), non-  
16 synthetics allowed. Our support for relisting  
17 gellan gum is based on the following.

18 Essential for organic production. Gellan gum  
19 is a necessary ingredient in many organic and  
20 made with organic products. It is used in  
21 various applications as a stabilizer or  
22 thickener. It is especially useful to suspend

1 water insoluble substances in liquid products.  
2 We use it in a number of our non-dairy  
3 beverages. It is unique characteristics are  
4 not matched by other gums or substances on the  
5 National List.

6 Safety. Gellan gum is classified  
7 as grass or generally recognized as safe for  
8 direct addition to food for human consumption.  
9 This is codified in 21 CFR Section 172.665.

10 Meets all criteria for addition to  
11 National List. Gellan gum meets all of the  
12 criteria for allowed substances, as required  
13 in CFR 205.600. It is essential for the  
14 handling of organically-produced agricultural  
15 products and there are no organic substitutes.  
16 Gellan Gum is grass and its manufacture use  
17 and disposal do not have adverse effects on  
18 the environment and are done in a manner  
19 compatible with organic handling.

20 We urge the Handling Committee and  
21 the NOSB to keep gellan gum on 205.605(a).

22 Glycerin. We also wish to comment

1 on the petition to remove glycerin from the  
2 National List. We support the increased use  
3 of organic ingredients in organic products.  
4 However, there is some uncertainty about the  
5 classification about non-organic glycerin  
6 which was mentioned by previous presenters.  
7 Is it agricultural or non-agricultural? If  
8 non-agricultural, is it synthetic or non-  
9 synthetic? This should be cleared up before  
10 the Board takes any decisive action.

11 In addition, there are concerns  
12 that organic glycerin may not be available in  
13 sufficient quantity for the needs of organic  
14 foods. Additionally, non-organic glycerin  
15 should be allowed in natural flavors. Getting  
16 flavored houses to use organic glycerin would  
17 be a big problem. Organic companies do not  
18 have the volumes to induce most flavor houses  
19 to use organic glycerin. Glycerin should stay  
20 on the National List with the requirement to  
21 use organic glycerin if it is commercially  
22 available.

1 Thank you.

2 CHAIR STONE: Thank you, Troy.

3 Questions? Zea.

4 MEMBER SONNABEND: Thank you.

5 Could you give us a little more specifics  
6 about what type of food processing situations  
7 you would use gellan gum in over xanthan gum,  
8 or guar gum, or one of the other gums, why it  
9 is unique?

10 MR. AYKAN: Or carrageenan, yes.

11 I have consulted with our R and D staff. They  
12 informed me that gellan gum has unique  
13 properties that is not matched by other types  
14 of gums. And in certain applications, such as  
15 when we want to suspend water insoluble  
16 substances, it is the substance to use.

17 CHAIR STONE: Harold?

18 MEMBER AUSTIN: You also  
19 mentioned, and we have seen a couple of  
20 written comments have also come in mentioning  
21 gellan gum being used as a substitute for  
22 carrageenan. Since that came up and was

1 relisted during our meeting in Albuquerque,  
2 have you seen an increased demand for gellan  
3 gum as a replacement for carrageenan?

4 MR. AYKAN: From my experience, I  
5 am not the person that formulates food  
6 products but, as far as I know, the way I  
7 understand it is that they have unique  
8 properties and may not be -- I don't want to  
9 cut it right there like it is impossible to  
10 replace it but in certain applications, they  
11 have unique properties to work without being  
12 able to substitute.

13  
14 CHAIR STONE: Great. Thank you,  
15 Troy.

16 MR. AYKAN: Thank you.

17 CHAIR STONE: Cheryl VanDyne to  
18 the microphone and Allison Walent on deck.

19 MS. VAN DYNE: Thank you. My name  
20 is Cheryl VanDyne. I am the Director for  
21 Global Regulatory Affairs for CP Kelco. I  
22 want to thank you for your time today.

1                   The purpose of my presentation  
2                   today is to talk about gellan gum and reasons  
3                   for relisting and to address some of the  
4                   issues that came up in public comment.

5                   First of all, gellan was listed at  
6                   205.605(a). and I know that in the Federal  
7                   Register they said focus on providing new  
8                   information. So, what I am doing is  
9                   addressing the information that you need to  
10                  have to support the comments that were made.

11                  CP Kelco does note that certain  
12                  comments were made and we think that maybe the  
13                  basis of this might be misinformation or some  
14                  unsubstantiated concerns. So like I said, the  
15                  comments are going to support addressing the  
16                  relisting of high-acyl gellan gum as non-  
17                  synthetic and to talk about the public  
18                  comments and process and safety.

19                  So, first of all, high-acyl gellan  
20                  gum is not harmful to human health or  
21                  environment. And we have information to  
22                  support this because it is approved as a food

1 additive in the U.S. and globally. And these  
2 approvals were based on extensive scientific  
3 reviews of safety and toxicology studies.

4 Additionally, it is not an impact  
5 to the environment, as noted in the EPA impact  
6 report.

7 The USDA TAP report that was  
8 prepared by the USDA NOP scientific evaluators  
9 provided expert safety evaluation of gellan  
10 gum for the NOSB Handling Committee and the  
11 NOSB Board. And this was based on full  
12 disclosure in the petition by CP Kelco. We  
13 disclosed it fully to the NOP under CBI. And  
14 this process allows us to do full disclosure  
15 and protect the confidential business  
16 information that protects our innovation but  
17 doesn't compromise the safety review. And I  
18 think that this is a very important point that  
19 was raised in public comment, talking about  
20 CBI. And representatives of CP Kelco provided  
21 public testimony and answered questions as  
22 they were asked.

1                   So, why high-acyl gellan gum?

2                   Well, first of all, it is used in a wide  
3                   variety of the 95 percent organic -- certified  
4                   at 95 percent. And it is proof that the  
5                   ingredient is valuable to the organic  
6                   producers and consumers, based on its high  
7                   use.

8                   It does have unique properties. I  
9                   think some of the questions you had today were  
10                  what is different about gellan and the others  
11                  and could they be substituted and I have a  
12                  couple of charts that I think will be helpful.  
13                  Kind of eye charts but if you take a look at  
14                  it, you can see that high-acyl gellan gum is  
15                  at the top. It goes into primarily beverages  
16                  and provides properties for chocolate milk  
17                  suspension. One of the -- across the list.

18                  One of the things that is unique  
19                  about gellan is its ability to completely  
20                  suspend nutrients. And those nutrients are  
21                  then delivered in the beverage as part of the  
22                  beverage, rather than having to shake or

1       whatever.  It really does suspend.

2                       So, the next chart is food  
3       applications.  Where is it used?

4       Confectionaries, water gels, and fruit bakery  
5       fillings, et cetera.

6                       High-acyl gellan gum is consistent  
7       with organic handling.

8                       The primary reason for the  
9       decision to not list --

10                      CHAIR STONE:  Thank you.  Calvin?

11                      SECRETARY WALKER:  Could you  
12       finish?

13                      MS. VAN DYNE:  I'm sorry.  Any  
14       questions?

15                      SECRETARY WALKER:  My comment was,  
16       could you go ahead and complete what you were  
17       trying to --

18                      MS. VAN DYNE:  Would you like me  
19       to finish?

20                      SECRETARY WALKER:  Yes.

21                      MS. VAN DYNE:  Oh, okay, thank  
22       you.  Thank you very much.

1                   When we submitted the petition for  
2 gellan gum, we put it with (b), 205.605(b).  
3 As a synthetic, we didn't know any different  
4 because that is where xanthan was.

5                   And so during the second review,  
6 and the NOSB kindly agreed to that, they took  
7 a look at what it was that caused them to  
8 think it was synthetic. And they actually  
9 said, and there is some public comment, that  
10 they didn't agree that gellan should be on the  
11 (b) list. They believed it should be on the  
12 (a) list.

13                   So, during that review, they  
14 looked at (a) versus (b) and determined that  
15 the presence of IPA does not make gellan a  
16 synthetic and that they recognized that  
17 although low-acyl is naturally occurring, they  
18 annotated it as high-acyl because they  
19 realized that low-acyl can be reduced as a  
20 process from deacetylation and, therefore,  
21 only high-acyl would be allowable.

22                   And, therefore, we are requesting

1 the relist at 205.605(a), high-acyl gellan gum  
2 as a non-synthetic.

3 CHAIR STONE: Very good. Thank  
4 you. Harold?

5 MEMBER AUSTIN: Could you tell us  
6 how much -- is the industry still utilizing  
7 gellan gum substantially since the last time  
8 it was reviewed? Has anything changed in the  
9 use demand of the material? Is it still being  
10 used about the same or is it increased or  
11 decreased?

12 MS. VAN DYNE: Are you asking if  
13 the use of gellan gum has reduced the use of  
14 other materials or if the use of gellan gum  
15 has increased?

16 MEMBER AUSTIN: Gellan gum,  
17 itself, what is its current status?

18 MS. VAN DYNE: Yes, gellan gum has  
19 increased.

20 CHAIR STONE: Great. Oh, Joe?

21 MEMBER DICKSON: So, in reviewing  
22 the transcript from 2007, when the Board last

1 reviewed this, it looked like there was a  
2 really complex conversation about how each of  
3 these materials is produced. Can you just  
4 speak a little bit about what is different  
5 about the processing of high-acyl versus low-  
6 acyl gellan gum that would cause one to be  
7 okay as a non-synthetic?

8 MS. VAN DYNE: Could you repeat?  
9 What different -- I don't hear very well. I'm  
10 sorry.

11 MEMBER DICKSON: Yes, that's okay.  
12 Could you explain a little bit more about what  
13 is different in the processing between high-  
14 acyl and low-acyl gellan gum?

15 MS. VAN DYNE: Yes. I am not the  
16 technical guru. I am the regulatory guru.  
17 So, there is a processing called deacetylation  
18 and it reduces the acyl groups. We have got  
19 Mr. Green up there. So, it reduces the acyl  
20 groups and creates, it is not a chemically  
21 different, it is a little bit different  
22 structure. It is still gellan gum but it is

1 recognized as deacetylated. And, therefore,  
2 it occurs naturally. The acyl groups break  
3 down naturally but in industry, if you want,  
4 you can change it to the deacetylated. And I  
5 think the Board recognized that.

6 We produce the high-acyl for the  
7 organic program certifiers.

8 Anything else?

9 CHAIR STONE: Thank you very much.  
10 And for the record, you are on the list for  
11 getting the tee-shirt for stopping on time.

12 (Laughter.)

13 CHAIR STONE: Allison Walent to  
14 the podium and Joy Rockwell on deck.

15 MS. WALENT: Good afternoon.  
16 Thank you for your dedication and service for  
17 organic agriculture.

18 My name is Allison Walent and I  
19 represent CROPP Cooperative Organic  
20 Valley/Organic Prairie, a farmer-owned  
21 cooperative representing more than 1,800  
22 farmer owners.

1                   We would like to express our  
2                   support of relisting high-acyl gellan gum as  
3                   a non-synthetic on 205.605(a). Please refer  
4                   to CP Kelco's the original petitioner's full  
5                   written comment for more information regarding  
6                   its non-synthetic classification.

7                   Scientific studies by the Food and  
8                   Agricultural Organization, as well as its  
9                   grass certification have demonstrated that  
10                  gellan gum is safe for human consumption.  
11                  When CROPP finds it necessary to use  
12                  additional ingredients, we strictly limit the  
13                  use of approved non-synthetics or synthetics  
14                  to meet consumer expectations for the highest  
15                  quality organic products.

16                  Since 2012, we have been  
17                  diligently working to remove carrageenan from  
18                  our products and have successfully done so  
19                  from our chocolate milk, egg nog, and soy  
20                  beverages.

21                  Gellan gum, for its properties as  
22                  a stabilizer and thickening agent has proven

1 to be the best alternative. It provides a  
2 comparable alternative in body and flavor to  
3 current consumer expectations for product  
4 performance.

5 CROPP Cooperative Organic Valley  
6 and Organic Prairie support the relisting of  
7 gellan gum on 205.605(a). We appreciate the  
8 opportunity to address the Board and thank you  
9 for your service.

10 CHAIR STONE: Thank you very much.  
11 Questions or comments? Joe.

12 MEMBER DICKSON: Are there  
13 specific products you could not functionally  
14 make without gellan gum and what are they?  
15 And is it the ones that you listed where  
16 gellan is an alternative to carrageenan or are  
17 there other products where gellan gum is the  
18 only viable ingredient?

19 MS. WALENT: Gellan gum is the  
20 best alternative but I am not an R and D food  
21 scientist. So, I would have to go back to my  
22 R and D Department with that.

1 MEMBER DICKSON: Thank you.

2 MS. WALENT: Yes.

3 CHAIR STONE: Great. Thank you  
4 very much.

5 Joy Rockwell to the podium and  
6 Brad Rockwell on deck.

7 MS. ROCKWELL: Hello. My name is  
8 Joy Rockwell and I am a consumer and a health  
9 educator. And I have to say, I make my own  
10 almond milk at home. I don't use -- there is  
11 no additives to it. It is just almonds and  
12 water and it is delicious. And I don't mind  
13 shaking it up.

14 But the reason I am here, I really  
15 believe in organic food. I am a member of the  
16 Cornucopia Institute. I am here as a citizen  
17 lobbyist. I work at two health organizations,  
18 the Retreat Centers, one in California, one in  
19 Austin. And the only thing we serve is USDA  
20 organic food. And I have seen people with  
21 Stage IV cancer reverse it. Prostate cancer  
22 that has metastasized to the bone and

1 endometrial cancer that has spread to the  
2 lungs, people have reversed it with organic  
3 food, produce, juices. So, organic is really  
4 important and non-GMO.

5 Today, I will talk about sodium  
6 carbonate peroxyhydrate. This material should  
7 never have been added to the National List.  
8 Now, it should be allowed to Sunset. Ideally,  
9 the NOP will accept the advice of the NOSB and  
10 return to the Sunset process that has been in  
11 effect since 2005. If the new NOP policy  
12 remains in effect, then we urge the Crops  
13 Subcommittee to draft a proposal to remove  
14 sodium carbonate peroxyhydrate from the  
15 National List.

16 There are several reasons to  
17 remove SCP. The product label states  
18 bactericide, fungicide, algaecide. One  
19 possible use for SCP is to control algae in  
20 rice. But apparently, it will kill fungi and  
21 bacteria along with algae. Use of a broad  
22 spectrum biocide is not consistent with

1 organic principles, which is to promote  
2 ecological balance.

3           The Crops Subcommittee, in 2007,  
4 voted unanimously against adding SCP to the  
5 list, zero yes, five no. The committee agreed  
6 that SCP was harmful to the environment, not  
7 essential because alternatives are available,  
8 and not consistent with organic production and  
9 handling. The checklist for SCP noted that it  
10 did not satisfy evaluation criteria 1, 2, or  
11 3. The checklist also noted that SCP does not  
12 any OFPA categories. For these reasons, SCP  
13 should never have been allowed in organic  
14 production in the first place.

15           The Crops Subcommittee should  
16 reconsider this information but they also need  
17 to consider the possible use of SCP for  
18 aquatic plants and hydroponic systems. Those  
19 uses were not evaluated in 2007 because the  
20 NOSB recommended that hydroponics should be  
21 prohibited. Recently, the NOP decided that  
22 crop aquaculture and hydroponics are allowed,

1 which means that all the crops materials must  
2 be reevaluated for those uses.

3           Lastly, I hope that the USDA  
4 organic regulations can be as strong and well-  
5 respected as those in other countries. The  
6 United States should lead the way.  
7 International standards do not allow SCP in  
8 crop production. We should not allow it here.

9           If you have questions about this  
10 testimony, I encourage you to speak with one  
11 of Cornucopia staff members. They are here  
12 today.

13           And I want to thank you, NOSB  
14 members, for your work in keeping organics  
15 strong. And remember what Hippocrates said:  
16 Let food be thy medicine. And I have seen so  
17 many people here through the years, hundreds  
18 of thousands of people the past 35 years have  
19 gone to these institutions and organics are so  
20 important for our health and well-being. So,  
21 thank you so much for the work that you do.

22           CHAIR STONE: Thank you. And

1 thank you for your support or organic food and  
2 your work. We appreciate that very much.

3 MS. ROCKWELL: It so important,  
4 yes.

5 CHAIR STONE: Thank you.

6 MS. ROCKWELL: Thank you.

7 CHAIR STONE: Brad Rockwell and  
8 Lisa Stokke on deck.

9 MR. ROCKWELL: Hello. My name is  
10 Brad Rockwell. I am 61 years old and have  
11 been eating vegetarian organic foods for about  
12 40 years. I depend on USDA organic  
13 certification program. I am also an attorney  
14 and I specialize in environmental law.

15 I am a member of the Cornucopia  
16 Institute and am here as a member because I  
17 volunteered to help present testimony because  
18 I want to ensure the integrity of organic  
19 food.

20 Today, I will talk about aqueous  
21 potassium silicate and sulfurous acid, which  
22 are currently up for Sunset review.

1                   Sulfurous acid is not allowed in  
2                   Canada, Japan, or Europe. Aqueous potassium  
3                   silicate, or APS, is not allowed, according to  
4                   standards of Canada, Japan, Europe, IFOAM or  
5                   Kodex. Why are these materials allowed in the  
6                   United States? Please vote to remove them  
7                   from the National List.

8                   Ideally, to ensure consumer trust  
9                   and organic integrity, I encourage the USDA to  
10                  reinstate the democratic Sunset process that  
11                  have been used since 2005. If that does not  
12                  happen, I encourage the Crops Subcommittee to  
13                  write proposals to remove these materials  
14                  during Sunset review.

15                  Aqueous potassium silicate should  
16                  never have been added to the National List.  
17                  In the 2003 TAP review for APS, two of the  
18                  three reviewers felt that APS should be  
19                  prohibited because of the highly soluble  
20                  synthetic fertilizers. The Crops  
21                  Subcommittee, in 2007, voted that APS should  
22                  not be allowed as an insecticide for disease

1 control or for hydroponic use. Despite this,  
2 the full Board approved APS, without realizing  
3 that the NOP would later allow its use in  
4 aquaculture and hydroponics.

5 The NOSB recommended that  
6 hydroponics should not be considered organic,  
7 yet the NOP disregarded that recommendation  
8 and stated that organic hydroponic is allowed.  
9 When the NOP chose to allow hydroponic  
10 production allowed the use of APS in a way  
11 that was not intended by the Board.  
12 Similarly, the NOP explicitly allowed crop  
13 materials to be used for plant aquaculture  
14 without input from the NOSB.

15 Since these uses were not  
16 evaluated by the NOSB, I hope that these  
17 materials will now be reevaluated.

18 In conclusion, we request that the  
19 original democratic Sunset review be  
20 reinstated. If the new NOP policy is  
21 retained, then the Cornucopia Institute  
22 recommends the Crops Subcommittee must write

1 proposals to de-list these two materials.

2 If you have questions about the  
3 subject of my testimony, I encourage you to  
4 speak with one of the Cornucopia staff members  
5 present here today.

6 Thank you to you all for the work  
7 that you have done over the years and for  
8 keeping organics strong. And thank you for  
9 allowing me to present testimony here today.

10 CHAIR STONE: Thank you very much.  
11 Thank you for your time.

12 Lisa Stokke to the podium and Beth  
13 Unger is on deck.

14 MS. STOKKE: Thank you and it is  
15 Lisa Stokke.

16 CHAIR STONE: Stokke. Thank you.  
17 Welcome.

18 MS. STOKKE: Thank you.

19 Before I begin my comments, I just  
20 want to say thank you to this volunteer board.  
21 I appreciate your service. Thank you.

22 Good afternoon. My name is Lisa

1       Stokke and I am Co-founder of Food Democracy  
2       Now. We are a grassroots organization based  
3       in Iowa dedicated to education and advocacy  
4       for sustainable agriculture, organics, and  
5       family farmers. Today, I stand before you as  
6       an organic consumer for 25 years, a mother,  
7       citizen, and a representative of the community  
8       of Food Democracy Now, which is over 700,000  
9       people strong and includes organic farmers and  
10      organic consumers.

11                   I am also a board member of  
12      OSGATA, Organic Seed Growers and Trade  
13      Association, which is a national membership  
14      organization representing certified organic  
15      farmers, seed growers, and seed companies.

16                   I have to say I am offering these  
17      comments under protest, as Food Democracy Now  
18      exists to advocate for the interests of the  
19      organic community and organic family farmers  
20      cannot condone in good conscious the removal  
21      of the statutory rights and responsibilities  
22      of the NOSB. The NOSB was established by

1 Congress as an independent citizen oversight  
2 board under the authority of the Organic Foods  
3 Protection Act of 1990. The OFPA represents  
4 the framework by which the organic community  
5 entered into partnership with the USDA in  
6 regulating the organic sector.

7 Yesterday, Food Democracy Now sent  
8 a call to action to our community to which  
9 over 30,000 people have responded in 24 hours  
10 by signing a petition to Secretary Vilsack,  
11 asking him to rethink the proposed changes to  
12 the NOP rules and protect organic integrity.

13 I echo the words of NOSB member  
14 Jay Feldman, who yesterday expressed a deep  
15 concern that many in the organic community  
16 share, with an apparent change in direction of  
17 the NOP. Namely, when he stated that the  
18 needs of the NOSB is primarily responding --  
19 the needs that they are responding to are  
20 primarily growth-oriented. The hope and  
21 expectation is that the NOSB serve as an  
22 advocate for the organic community and act in

1 the spirit of cooperation and partnership.

2           Sadly, organic is a victim of its  
3 own success. As more people have woken up to  
4 the adverse health and environmental impacts  
5 that are associated and caused by eating food  
6 from the industrial foods system, more are  
7 turning to organic as a safe haven. The  
8 people have enjoyed and earned trust in  
9 organic farmers and producers.

10           Trust was waned in recent years,  
11 however, particularly because of the USDA's  
12 failure to properly stand up for organic  
13 principles. The prevailing hope and  
14 expectation of organic consumers has been of  
15 purity and integrity. Organic is more than  
16 simply a label.

17           I am an individual who made a  
18 commitment to organic. I have consistently,  
19 for over 20 years, driven two hours one way to  
20 source organic food that I trust to feed my  
21 four children. I have always been grateful  
22 that organic is available, the chemical and

1 genetically engineered alternative being  
2 unthinkable.

3           The Titanic of our food system is  
4 sinking and organic is a lifeboat for parents  
5 and children suffering from food allergies and  
6 to individuals whose food is literally making  
7 them sick. We cannot sink the lifeboat.

8           Aside from individual health,  
9 people buy and remain committed to organic, as  
10 it creates community and a vibrant society,  
11 through fostering human health, the support of  
12 small family farmers, and the conservation of  
13 healthy soil and pure seed.

14           I close by reiterating the support  
15 of organic integrity by millions of  
16 individuals. It is our hope that the NOP and  
17 the USDA will work in cooperation with the  
18 NOSB as a trusted partner representative of  
19 the organic community. We have respected the  
20 action of the USDA to regulate but not to  
21 take. As a community, we will protect organic  
22 integrity.

1 Perfect. Thank you.

2 (Applause.)

3 CHAIR STONE: Thank you. Thank  
4 you very much.

5 Okay, Beth, before you get  
6 started, then we have Zareb Herman on deck,  
7 Board Members, we have five presentations  
8 left, just so you can sort of pace yourself  
9 and know where we are.

10 Beth, welcome.

11 MS. UNGER: Thank you very much.  
12 It is good to be here and thank you all for  
13 your great service and to the NOP for the  
14 improvements we have seen over the past four  
15 years. We appreciate your willingness to work  
16 together.

17 I am Beth Unger. I am  
18 certification manager at CROPP Cooperative,  
19 marketing products through Organic Valley and  
20 Organic Prairie brands. And I would like to  
21 talk about the seed purity report.

22 The Materials Committee and the

1 former GMO Ad Hoc Committee put out a  
2 beautiful document. It was such nice work and  
3 I really appreciate what you did. I think my  
4 favorite part of that document was in the very  
5 beginning, when you stated that one of your  
6 conclusions said a seed purity standard can be  
7 consistent with process-based standards. We  
8 agree very much so. We did respond to that  
9 document in a point-by-point in our written  
10 comments. I don't want to go over that with  
11 you today because I am sure you all read that  
12 with great interest.

13                   So, I just wanted to bring up a  
14 few points that can't be emphasized enough.  
15 And first of all is that when seed is  
16 contaminated, the crops that come from that  
17 seed will be contaminated. There is no  
18 question about it. Practices that the farmers  
19 can employ such as delayed planting, or buffer  
20 zones, or whatever can certainly mitigate the  
21 risk of contamination but contaminated seed  
22 equals contaminated crop.

1                   And proliferation of genetically  
2                   engineered crops is frightening. It is the  
3                   USDA that is allowing the proliferation of  
4                   genetically modified crops in this country.  
5                   To expect the USDA to come back with a  
6                   polluter pays, it is a great idea. I would  
7                   love to see that idea get traction.

8                   For the organic community, I  
9                   believe we have a very serious duty here and  
10                  that duty is to preserve clean seed for now  
11                  and future generations. It is the right thing  
12                  to do. We cannot let that go.

13                  And so I am here to request that  
14                  the NOP and the NOSB get together a Task Force  
15                  of the real experts in this field, the organic  
16                  seed growers, other seed growers. Put them  
17                  together and come up with a solution that is  
18                  something more than polluter pays.

19                  Thank you very much for your  
20                  service. I appreciate it.

21                  (Applause.)

22                  CHAIR STONE: Thank you, Beth.

1 Thank you for your work as well. Thank you  
2 very much.

3 Zareb to the podium and Peggy  
4 Miars on deck.

5 MR. HERMAN: Good afternoon. My  
6 name is Zareb Herman and I am a food scientist  
7 with the Hain Celestial Group, one of the  
8 largest organic handlers in the world.

9 We appreciate the work of the  
10 Materials Subcommittee but we strongly  
11 disagree with the recommendation to eliminate  
12 confidential business information or CBI from  
13 petitions.

14 I work for a manufacturer and  
15 manufacturers are businesses. To stay in  
16 business, they must protect their trade  
17 secrets and proprietary processes from  
18 competitors. It is quite feasible to allow  
19 CBI and still obtain sufficient information  
20 from the petitioner to make decisions  
21 concerning the classification of a material  
22 and its suitability for use in organic

1 production or handling.

2 To accomplish this, technical  
3 review contractors and the NOSB should be  
4 authorized to work closely with each  
5 petitioner to obtain the necessary information  
6 without disclosing information that is  
7 confidential to the business. We all know  
8 that it has become extremely difficult to get  
9 any petition approved to add a material to the  
10 National List.

11 I would like to share an  
12 experience I had at the Natural Products Expo  
13 in Anaheim. I was speaking with another  
14 organic foods manufacturer when a man  
15 approached us. The man produced conventional  
16 foods but he was interested in making organic  
17 and it would be a new category of organic  
18 foods. However, his manufacturing process  
19 required a small amount of a benign but  
20 synthetic ingredient that is not on the  
21 National List. He asked about the petition  
22 process and we told him that it would take

1 years and require a fair amount of money to  
2 hire someone to write the petition.

3 Then he asked about the chances of  
4 getting the petition approved. And we had to  
5 be honest with him that the chances were very  
6 slim. So, he dropped it and we lost the  
7 opportunity for a new category of organic  
8 products that would utilize potentially  
9 millions of pounds of organic ingredients.  
10 And we also lost the new organic acreage that  
11 would lead to less pesticides, less  
12 herbicides, and fertilizers, and less erosion  
13 of topsoil. This is sad because we need more  
14 organic acreage, not less.

15 Manufacturers are already  
16 reluctant to submit petitions. This  
17 recommendation to eliminate confidential  
18 business information will further deter  
19 manufacturers from even trying. Some  
20 petitions will not require CBI but some will.  
21 We urge the NOSB to exercise good judgment and  
22 go with the Subcommittee's Recommendation 2,

1 which allows confidential business information  
2 in petitions.

3 In closing, I thank the Board for  
4 their valuable service. And I wish to thank  
5 Miles McEvoy and his entire staff at NOP. I  
6 have always found them to be highly  
7 professional, impartial and dedicated to doing  
8 what is best for organic foods and the entire  
9 organic community.

10 Thank you.

11 (Applause.)

12 CHAIR STONE: Thank you. Any  
13 questions? Thank you very much.

14 Peggy Miars to the podium and  
15 Marty Mesh on deck.

16 MS. MIARS: Good afternoon. My  
17 name is Peggy Miars and I am the Executive  
18 Director of OMRI, the Organic Materials Review  
19 Institute and I have been an organic consumer  
20 for nearly 30 years.

21 I want to first thank each NOSB  
22 member and the NOP staff for your service.

1 Yesterday, I had literally one minute of  
2 comments regarding confidential business  
3 information in petitions. But after listening  
4 to the proceedings yesterday and reading some  
5 of the written comments that I hadn't yet  
6 read, last night I expanded my comments.

7 Well first, OMRI agrees with the  
8 proposal to eliminate the provision for  
9 confidential business information in  
10 petitions. Only generic materials should be  
11 petitioned for evaluation by the NOSB.  
12 Formulated products should be submitted to a  
13 certifier or a material review organization  
14 for evaluation. Therefore, it makes sense  
15 that confidential business information is  
16 required for a brand name product review but  
17 not for a petition material being reviewed by  
18 the NOSB.

19 Personally, I am glad to see that  
20 the procedures for requesting technical  
21 reports continues to be made independent of  
22 the availability of funds. And if there is a

1 lack of funding to secure a TR, the review of  
2 the materials should be put on hold. That  
3 ensures that substances on the National List  
4 receive the appropriate evaluation that  
5 stakeholders expect. But if you do find that  
6 you must go forward without a TR, I caution  
7 you to proceed very carefully because you may  
8 not have the current and full information.

9           Now for my additional comments,  
10 which are on the Sound and Sensible  
11 Initiative. I appreciated the written  
12 comments from the Organic Product Wholesalers  
13 Coalition suggesting centralizing a material  
14 review system through OMRI. I also  
15 appreciated the National Organic Coalition's  
16 recommendations to standardize the material  
17 review system's use by ACAs, to emphasize  
18 policies that encourage material suppliers to  
19 submit their products to OMRI for review, for  
20 operators to use OMRI-listed materials in  
21 order to move toward a centralized review  
22 system, and to expand the scope of NOP's

1 accreditation to include MROs that are not  
2 ACAs.

3 I couldn't agree more and,  
4 frankly, I couldn't have written a better  
5 promotions for OMRI. So thank you, Liana,  
6 wherever you are.

7 So, I encourage all of us to think  
8 creatively to find a better way to serve the  
9 organic operators when it comes to material  
10 review. After all, growers, handlers, and  
11 processors are benefactors or possibly victims  
12 of material review decisions. As a non-profit  
13 organization, OMRI's main motivation is our  
14 mission, rather than money. If the NOP  
15 doesn't have funding for such a material  
16 review improvement project, perhaps OMRI and  
17 other non-profits could seek grant funding to  
18 help with this.

19 I am in the middle of reading a  
20 book called Get There Early: Sensing the  
21 Future to Compete in the Present. And the  
22 biggest takeaway for me, halfway through this

1 book, is that many of us learn to be problem  
2 solvers where there must be one right answer,  
3 where there is one winner and possibly  
4 multiple losers but in today's world, the  
5 volatility, uncertainty, complexity and  
6 ambiguity, we face many more dilemmas than  
7 problems.

8           Now dilemmas are problems that  
9 won't go away, problems that have no right or  
10 wrong or even a solution. Instead, it is  
11 often possible to come up with win-win  
12 strategies where there is more than one  
13 winner.

14           So, I don't have the answers here  
15 today but I am willing to participate in a  
16 discussion about improving the material review  
17 process and how OMRI can provide support and  
18 services for the organic community.

19           So in closing, I will pose a  
20 question and ask do we need a working group to  
21 address this dilemma of consistency and  
22 transparency in material review.

1                   And in my remaining seconds, I  
2                   will just comment that a year ago I came right  
3                   after John Ashby's comments, where he gave an  
4                   eloquent poem. And today, I understand I am  
5                   right before Marty Mesh and John Ashby. So,  
6                   the entertainment begins when I am done here.  
7                   Thank you.

8                   (Laughter.)

9                   CHAIR STONE: Very good! Pretty  
10                  good!

11                  (Applause.)

12                  CHAIR STONE: Cheers to you!  
13                  Great. Thank you.

14                  Questions for Peggy? And I know  
15                  the ACA training there is a lot of discussion  
16                  about how to standardize and get some more  
17                  uniformity around this MRO. So, thank you for  
18                  working on it in the bigger picture, not in a  
19                  self-serving way. So, thank you.

20                  MS. MIARS: Thank you.

21                  CHAIR STONE: And your name is on  
22                  the mug list.

1 MS. MIARS: All right!

2 CHAIR STONE: Okay, Marty, you are  
3 up and John will close it out.

4 MR. MESH: Tell me when, because I  
5 am in it for the tee-shirt.

6 CHAIR STONE: When.

7 (Laughter.)

8 MR. MESH: My name is still Marty  
9 Mesh. I am still the Executive Director of  
10 Florida Certified Organic Growers and  
11 Consumers, a non-profit organization which  
12 operates a certification program called  
13 Quality Certification Services, as well other  
14 types of education and foods systems programs.

15 I started growing organically in  
16 1972 on a larger scale in 1976 as part of  
17 Bellevue Gardens Organic Farm. As I watched,  
18 listen, and feel the evolution of our  
19 community, I am increasingly frustrated in how  
20 we frame what I thought was our common goal of  
21 furthering organic agriculture. That is a way  
22 to protect our natural resources, our precious

1 surface and groundwater, the biodiversity of  
2 nature, and to affect farmers' and workers'  
3 health by not being exposed to the many  
4 poisons that have cut short farmer friends of  
5 mine in agriculture and their lives, and  
6 workers and farmers I don't know but I know  
7 they left behind children without a  
8 functioning or alive mother or father.

9           Then there is the health of folks  
10 eating the produce food and products derived  
11 from organic agriculture. The intent, in the  
12 words of Kathleen Merrigan, have been  
13 occasionally tossed around and one quote I  
14 vividly remember is, "don't let the perfect be  
15 the enemy of the good" or I might say, very  
16 good, especially when I think of where we were  
17 not so many years ago.

18           It seems to me that here in public  
19 comment that I need to state my thanks to  
20 members of this Board for all the time,  
21 energy, and work you all have put in. And  
22 thank you and acknowledgment to the USDA and

1 Mark for institutionalizing organic further  
2 within the context of the USDA and the NOP,  
3 under Miles' leadership. Clearly, I do not  
4 agree with every decision or action that comes  
5 out of the National Organic Program or the  
6 National Organic Standards Board. Just to  
7 repeat, clearly, I don't agree with every  
8 decision that comes out of the NOP or the  
9 NOSB. However, listening to Miles'  
10 presentation, listening to what the Program  
11 has accomplished to the presentation on the  
12 challenges of getting stuff through the  
13 Federal Register process should have given  
14 everyone in this room something for  
15 consideration on how to move ahead, versus  
16 just how to take a stance on no, no, no.

17 Because of the Program's work,  
18 certifiers are much clearer about interpreting  
19 standards, implementing standards verification  
20 consistently, and that should relate to  
21 consumer confidence.

22 The work that the Program has done

1 and is doing is a long way from where we were.  
2 But no one seems to know that. We don't put  
3 that out on social media and all that other  
4 kind of stuff.

5           Certifiers are undergoing rigorous  
6 oversight and are still required to submit  
7 corrective actions of any shortcomings that  
8 they find in their operation -- do I get  
9 three minutes or four? Phew. Okay. -- to  
10 change and improve their system as needed. As  
11 Jessica stated: "Why am I here?" To urge a  
12 more civil discourse in an open mind and heart  
13 in hearing others in the hopeful reaffirmation  
14 that if, collectively, we view the widespread  
15 adoption of organic agriculture practices as  
16 beneficial to helping solve some of the  
17 pressing issues of our time in leaving the  
18 planet in a healthier state for not only our  
19 children but my grandchildren who was born  
20 Sunday morning before I came here, --

21                           (Applause.)

22           MR. MESH: -- that we need to with

1 a new and revigorated attitude for generations  
2 to come.

3 So with that, I am open to taking  
4 any questions and I am going to keep talking  
5 until we get to exactly four minutes because  
6 I am in it for the tee-shirt. So, I read it  
7 too fast and I am just going to stop in  
8 another two seconds -- 20 seconds? Shit!

9 (Laughter.)

10 MR. MESH: I want credit for that  
11 time that I went over or something like that.  
12 This will even it out. Thank you very much.

13 (Applause.)

14 CHAIR STONE: Thank you, Marty.  
15 Marty, we gave a tee-shirt yesterday for a  
16 heartfelt. You get it for style points.  
17 Okay?

18 John, welcome and close out the  
19 oral statements.

20 MR. ASHBY: Thank you. I'm John  
21 Ashby. And there once was a man from  
22 Nantucket -- no! No, that was the OMRI dinner

1 after a whole bunch of wine.

2 (Laughter.)

3 MR. ASHBY: I probably better  
4 confess at the outset, despite what some  
5 people might think of me from my comments,  
6 that I am actually not an American style  
7 democracy-hating communist troublemaker.  
8 Troublemaker, I can't really completely get  
9 rid of that one.

10 But anyway, I have been doing this  
11 organic stuff in different ways for over 20  
12 years. For some reason, people have elected  
13 formerly five times to different leadership  
14 positions. Sometimes they are the same one.  
15 If I was an American style democracy-hating  
16 communist, it would have come out by now. But  
17 it gets worse. If I had somebody who could  
18 help me grow organics who was an American  
19 style democracy-hating communist, welcome.  
20 Growth of organics is too important.

21 One of the little things I try to  
22 do and I would like to encourage people to do,

1 is I always ask is this going to help  
2 organics, the big picture of organics? Is  
3 this going to help organics or is this going  
4 to mangle it? And what I think gets glossed  
5 over at these meetings all too often is that  
6 there is two sides to this growing organics.  
7 Buying it. People want to buy it. They  
8 should. It's great, despite what one might be  
9 able to take away from some of these meetings.  
10 Again, ask is this helping to grow or mangle.  
11 But also important is making it. People need  
12 to be able to make it.

13 I got an email today from a really  
14 famous Midwest organic farmer who is writing  
15 about how he just had to go to the dark side  
16 because things were so unpredictable he had to  
17 go to some conventional farming. He didn't  
18 like it. He has to do it. I would like that  
19 to stop.

20 Another confession, a bad one,  
21 this is worse than communist. I am an actual  
22 card-carrying certified food scientist. There

1 is only about 1,500 or so of us in the world.  
2 This includes the science, the making, the  
3 health and nutrition, the food safety. You  
4 really have got to know all this stuff. This  
5 means I have a pretty good handle on the  
6 issues of making the food, while at the same  
7 time understanding the balance with organic  
8 rules and principles. Glycerin is a great  
9 example. The multiply mentioned food safety  
10 requirements, these are not an option. These  
11 are not something you have a choice about,  
12 period. It is not an option.

13           And if you take glycerin away, you  
14 are going to damage a lot of organic food  
15 production. If you want to do that, that is  
16 fine. You have your right to your opinion but  
17 you can't ignore the outcome of hurting a part  
18 of the organic food industry. It is a  
19 mistake, in my view. A huge generic solution  
20 to this issue is put some energy to an OFPA  
21 change to just add commercial availability to  
22 605.

1                   It gets even worse. Here it  
2 comes. The Sunset policy is not the end of  
3 the world.

4                   (Laughter.)

5                   MR. ASHBY: Way worse, it is a  
6 good thing that more deliberation is required  
7 before you mess with organic food production.  
8 Even this does not make me a communist  
9 American democracy-hating troublemaker. Is  
10 this going to help or mangle organics?

11                   And I saved until the end, in case  
12 I didn't have time, thanks to both the NOSB  
13 and the NOP for all the work that you do.  
14 Let's just really remember how much we are all  
15 in this together and we have got a lot of  
16 things stacked up against us. So, let's  
17 remember we are in this together.

18                   CHAIR STONE: Well, I don't know  
19 if that is in the mug category or the tee-  
20 shirt but we will vote on it later. Okay?

21                   Thank you very much for those  
22 comments. Very good. Questions for John?

1 Okay, thank you.

2 (Applause.)

3 CHAIR STONE: Thanks to everyone.

4 We joked about the tee-shirts and  
5 the mugs but really we are not joking because  
6 the respect that we give for the time, to give  
7 each other time, to give us have time to ask  
8 questions, we are going to get -- so the tee-  
9 shirt list is Harriet, Jessica, Will, Cheryl,  
10 and Marty. And the mug is Liana and Peggy.

11 So, Michelle will figure out how  
12 to get those to you because we didn't bring  
13 that many and we really greatly appreciate  
14 that respect.

15 So, we are going to take a 15-  
16 minute break and we will start the Crops  
17 Subcommittee promptly at 3:45. Thank you all.

18 (Whereupon, the foregoing meeting  
19 went off the record at 3:29 p.m.  
20 and went back on the record at  
21 3:45 p.m.)

22 CHAIR STONE: Okay, we're going to

1 move into the Crops Subcommittee. And this is  
2 going to be the trial run for the 2015 or the  
3 new Sunset process. So, it is important that  
4 we are thorough in our deliberations here. We  
5 want to get it -- so, yes. It feels really  
6 loud right here.

7 So, if you all could take your  
8 seats in the back. Calvin.

9 So, this part of the Program was  
10 scheduled to start at 3:00. It is 3:45, so it  
11 looks like we will be going to 6:00 or so,  
12 just for gauging your time slots here.

13 So, with this, Zea, I guess, if  
14 you want to be sort of generic -- oh, yes.  
15 You all do want to pay attention to this. You  
16 may not be paying attention to me, but this  
17 is something you ought to pay attention to.

18 Okay, let it roll, whoever has the  
19 --

20 MEMBER SONNABEND: Thank you.

21 Well, as Marty said, we deal with a lot of  
22 very complex and contentious topics here and

1 sometimes we lose sight of what we are really  
2 all doing here and what our common goals are.  
3 And so, I thought we would take a little bit  
4 of time, three minutes or so to reflect on  
5 what really brought us all here, which is the  
6 dangers of pesticides. So, we are going to  
7 show three minutes of a five minute video to  
8 remind us all about the dangers of pesticides.  
9 And if you don't have a sense of humor, you  
10 might as well leave the room now for three  
11 minutes.

12 Thank you. Go ahead, Michelle.

13 (Whereas, a video was played from  
14 3:47 p.m. to 3:53 p.m.)

15 MEMBER SONNABEND: Okay, I know we  
16 left you in suspense but believe me, Mickey in  
17 1935, which that is an original clip from,  
18 does come back live another day. And it is  
19 our duty, I think, to protect his garden in  
20 the future from the ravages of pesticides.

21 Okay. Without further ado, we  
22 have a number of topics here for the Crops

1 Committee and we are going to take them in  
2 order as they appear on the agenda. And we  
3 are going to run this with a presentation from  
4 each key point person who worked on each  
5 material, starting out with Lisa Brines from  
6 the Department, giving us the background on  
7 each material and then a summary of the public  
8 comments and then followed by Board  
9 discussion.

10 So, streptomycin is the first  
11 thing up. And so, Lisa, if you will take us  
12 away.

13 DR. BRINES: Sure, thank you. The  
14 petition for streptomycin was submitted on  
15 February 26, 2013. It was a joint submission  
16 by four different parties, the Washington  
17 State Horticultural Association, the  
18 California Pear Advisory Board, the U.S. Apple  
19 Association and Michigan State Horticultural  
20 Society.

21 The material is currently listed  
22 at Section 205.601 of the National List under

1 synthetic substances allowed for use in  
2 organic crop production. Paragraph (i) as  
3 plant disease control, number 11, streptomycin  
4 for fire blight control in apples and pears  
5 only until October 21, 2014.

6 The most recent technical  
7 evaluation report for this substance was  
8 completed in 2011 and there are additional  
9 technical reports that predate that one.

10 This particular petition was also  
11 on the agenda for the fall 2013 meeting that  
12 was canceled. So, there is both a  
13 Subcommittee proposal from the fall meeting  
14 and an updated one for this meeting.

15 Thanks.

16 MEMBER AUSTIN: Okay, the  
17 difference between the petition -- the  
18 proposal that the Crops Subcommittee had  
19 brought forward for the Louisville meeting  
20 versus this one, there was one change based  
21 off of comments from the petitioner. We added  
22 -- the petitioner Blossom Protect, they had

1 commentary on a position, comments that the  
2 proposal had stated. So, we added the  
3 inclusion under the points of fire blight  
4 control, points of agreement and disagreement.  
5 I think it is on page 2. We added, under  
6 experience of pear growers, especially in the  
7 2013 season, has shown that Blossom Protect  
8 has not worked well in the Pacific Northwest  
9 for California. After that we added in  
10 parentheses we added the manufacturer of  
11 Blossom Protect does not agree with this  
12 statement and has voiced their disagreement  
13 during the written public comment period prior  
14 to the canceled fall 2013 NOSB meeting. So,  
15 we did include that statement to address that  
16 concern.

17 Going through the list of public  
18 comments, we had two groups of commentary that  
19 we needed to take and look at. We had to go  
20 back and revisit the written public comments  
21 that were submitted for the fall presentation  
22 -- the canceled fall meeting, along with the

1        comments received for the spring.

2                    A quick, just a quick breakdown of  
3        that, we had for the canceled meeting in the  
4        fall, we had ten written comments in support  
5        of the majority position from research, CCOF,  
6        the OTA, UNFI, Pennsylvania Certified Organic.  
7        We had two comments, one from the Organic Tree  
8        Fruit Association that was taking more of a  
9        centralist position, another one from Organic  
10       Produce Wholesalers that was taking a neutral  
11       position. And then one from Westbridge, the  
12       manufacturer of Blossom Protect that also took  
13       a neutral position, neither supporting or not  
14       supporting the position -- the proposal as  
15       submitted.

16                    Okay, for the fall meeting, those  
17        that were not in support of the extension, we  
18        had 314 specific comments that were against  
19        the majority position. There were three large  
20        petitions that were signed and we had several  
21        groups and organizations that also submitted  
22        comments beyond pesticides, not Cornucopia to

1 name a couple of them.

2 For the spring public comment  
3 period, we had six written comments that were  
4 submitted that were in favor: PCO, the  
5 California Apple Commission, OTA, plus Steve  
6 Chinchilio of River Bend Orchards, an organic  
7 grower in California, Bill Denevan, who also  
8 gave an oral presentation today as a grower  
9 representative for Viva Tierra and he is also  
10 a consultant, as he said today.

11 We supported a neutral position,  
12 Organic Produce Wholesalers Association. They  
13 believe that the NOSB should not take away  
14 production tools before development of viable  
15 workable alternatives, lest we risk crippling  
16 the important segments of the organic industry  
17 that can take years to rebuild. But they did  
18 not support either the majority or the  
19 minority position on this proposal.

20 Not supporting either position,  
21 again, as I said, Westbridge, the manufacturer  
22 of Blossom Protect. Also not in favor of the

1 proposal, we had 424 individual comments that  
2 were submitted. Organic Consumers Association  
3 submitted a petition of 39,851 signatures.  
4 Food and Water Watch submitted a petition of  
5 12,427 signatures on it that were opposed.

6           Again, we had several groups or  
7 associations, Cornucopia, Beyond Pesticides,  
8 NOC, the Infectious Disease Society of  
9 America, the Center for Food Safety, just  
10 saying a few of those that were submitting  
11 commentary.

12           In support of the Subcommittee's  
13 decision to extend this, what the proposal was  
14 to extend streptomycin, the expiration date  
15 from October 21, 2014 to replace it with a new  
16 expiration date of October 21, 2017 for both  
17 apples and pears.

18           The classification motion, that  
19 would stay static because it was already  
20 classified and list on the National List. The  
21 motion as it reads on the proposal itself is  
22 a motion to remove the existing expiration

1 date of October 21, 2014 for streptomycin at  
2 205.601(i)(11) and replace it with an  
3 expiration date of October 21, 12017, so that  
4 the listing reads: (11) Streptomycin for fire  
5 blight control in apples and pears only until  
6 October 21, 2017. That was moved forward on  
7 a five yes, three no out of the Crops  
8 Committee to the full Board review today.

9 We have an additional motion, a  
10 resolution that read the National Organic  
11 Standards Board is committed to phase out of  
12 this material. Between now and the expiration  
13 date, the Board urges growers and certifiers  
14 to include in organic systems plans and annual  
15 increase in the extent and/or number of  
16 alternative practices and materials that are  
17 trialed for controlling fire blight. In  
18 addition, the Board strongly advocates to the  
19 USDA a high priority for increased support for  
20 research into these alternatives practices and  
21 materials.

22 Part of the rationale for the

1 majority position of the Crops Subcommittee  
2 was that going through the listing, listening  
3 to commentary and the materials that we have  
4 had and the petition itself, that the organic  
5 stakeholders that were looking for an  
6 extension felt that the alternatives have not  
7 been given adequate time to complete the  
8 trials to get into the hands of the growers,  
9 the people that are actually going to use  
10 those materials and work them into their day  
11 to day production practices, so that they  
12 could figure out exactly how and properly to  
13 use those materials in an effective manner.  
14 They feel that having an expiration date of  
15 2014 still does not allow them adequate time  
16 to take those materials, get them into their  
17 systems, and implement an organic systems plan  
18 approach that would be viable to their  
19 business model as it exists today to prevent  
20 the fire blight disease and the bacteria from  
21 damaging their crops.

22 Also, these growers have had

1 tremendous time, energy, and expense in  
2 investment in these crops. As we heard from  
3 one of the oral commenters today, it takes  
4 years and years to develop these ranches.  
5 Once fire blight gets established, it takes an  
6 extended period of time to figure out how to  
7 deal with it, even using the existing tools.  
8 So, allowing more time for more research and  
9 development of the materials, the potential  
10 replacement materials, seemed like it was the  
11 right thing.

12 Allow science to run its course  
13 and allow the research and the research  
14 dollars that are already being expended and  
15 spent to take and exert the value that they  
16 present to those stakeholders. We are  
17 spending the money. They are spending the  
18 money. Allow them the time to complete those  
19 studies and those trial.

20 And then concern for the impact on  
21 additional stakeholders, what that might have  
22 as far as volume of crop production, would

1       there be a reduction to those that have built  
2       their businesses from a handling and sales  
3       standpoint, what impact would the loss of  
4       streptomycin have. So, we looked at that as  
5       well.

6                       So, we felt that a slight  
7       extension to 2017 was a reasonable approach to  
8       allow these necessary steps to take place and  
9       allow this to move forward. And that is why  
10      we moved this proposal forward as we have  
11      done.

12                     MEMBER SONNABEND: Thanks, Harold.  
13      We will have discussion now. But I think on  
14      this and most all of our proposals, unless we  
15      think there is unanimousness, we will postpone  
16      voting until tomorrow. Does that seem  
17      appropriate? Because we are running so late  
18      the voting takes time -- Friday. Sorry. To  
19      the end of the meeting when we have reserved  
20      for voting.

21                     So, Mac, are you going to call on  
22      people for the discussion?

1 CHAIR STONE: Sure. Is there  
2 discussion, questions from other Board  
3 members, other Crops Committee members? I  
4 know there is a minority opinion that we will  
5 get to as well.

6 Calvin.

7 SECRETARY WALKER: My question is  
8 the October 21, 2017, is this the drop-dead  
9 date, regardless, no matter what?

10 MEMBER AUSTIN: That is what we  
11 would like it to be. That is what we would  
12 say that it would be. And I mean that is how  
13 the proposal that we have moved forward is,  
14 Calvin.

15 I don't think the industry would  
16 look to try to repetition for an extension.  
17 The 2017 would allow time for the existing  
18 trials research that is ongoing to be  
19 completed. Additional alternative materials  
20 to get through the registration course of  
21 action so that it is there in the hands of the  
22 handlers -- not the handlers but the growers

1 and those stakeholders. So, it would give  
2 them adequate time for that to take place.

3 CHAIR STONE: Other questions from  
4 the Board? Jay.

5 MEMBER FELDMAN: Well, I don't  
6 know if the Board has read the minority  
7 position thoroughly. I think we did get kudos  
8 for putting together a document that was more  
9 readable than the previous document and that,  
10 as a Committee, we acknowledged what the key  
11 issues were and then provided sort of a  
12 point/counterpoint, so that people could see  
13 that we have addressed each other's issues  
14 from a minority and majority standpoint.

15 So, the other thing that people  
16 will remember is that we had a speaker back at  
17 the Portland meeting a year ago, I guess, from  
18 the Infectious Disease Society of America,  
19 which submitted formal comments this time and  
20 Dr. Morris also submitted comments again in  
21 support of the minority position.

22 The key, you know obviously, there

1 are issues of production, which are important  
2 issues. And you know if you go back in the  
3 history of the NOSB, this is not a new issue.  
4 We have been on the Board, previous Boards  
5 have been struggling with this issue for a  
6 long time.

7 So, the experience seems to be  
8 until the Board actually takes a position on  
9 getting something off the market, often we  
10 don't see the research gearing up. We don't  
11 see the money going in. And in fact, the  
12 Board back in Seattle identifying this with an  
13 expiration date, I think most people would  
14 agree helped to stimulate research on  
15 alternatives.

16 But the history on this really  
17 starts back way before that. I would say the  
18 original Board even struggled with this. And  
19 the Board previous to the Seattle meeting back  
20 in 2008 had come very close and issued  
21 warnings on removing both tetracycline and  
22 streptomycin.

1                   So anyway, the document is pretty  
2 clear. The issue of exposure to streptomycin  
3 seems to be a higher concern, even than  
4 tetracycline in terms of direct human exposure  
5 and transfer and horizontal gene transfer.  
6 Concerns about antibiotic resistance, as you  
7 know, this is the key public health issue.  
8 That is why the Infectious Disease Society of  
9 America has gotten involved in all of this.

10                   And then struggling with the  
11 question of how do you move something off the  
12 market to effect different management  
13 strategies and how do you balance that with  
14 the public health concerns associated with  
15 continued use.

16                   So, we are talking human health,  
17 ecological effects, effects on microbial  
18 activity, weighing into the medical community.  
19 We heard from the alternative producer of  
20 biological-based material. We know it is not  
21 perfect but we have made a lot of headway  
22 since the original expiration date. The Board

1 has already extended the expiration date once.  
2 We have seen new research. Hopefully, we will  
3 see more research coming in. And we just  
4 can't afford to expand this problem of  
5 antibiotic resistance. It is just something  
6 that the organic community has to lead on, I  
7 think. And I think that is the view of the  
8 minority, generally, here.

9 If anybody else in the minority  
10 wants to say anything, I defer to them.

11 CHAIR STONE: Other comments,  
12 thoughts? Tracy.

13 MEMBER FAVRE: Yes, this one is  
14 tough for me because like oxytetracycline,  
15 there are significant impacts to the growers.  
16 Should we take it from the marketplace? These  
17 are not crops that can be regrown across a  
18 season. As the commenter earlier today  
19 mentioned, it is an investment in time, one  
20 that has significant long-term impacts.

21 But looking at it from an  
22 environmental standpoint, streptomycin

1 troubles me for reasons that oxytetracycline  
2 did not, in that it is allowed for repeated  
3 application even after blossom fall. And the  
4 half-life in the soil persists longer. It is  
5 still not terribly persistent. I think the  
6 checklist said something like 17 and a half  
7 days for the half-life. But there is also  
8 residue that is detectable in the fruit  
9 itself.

10 So, unfortunately, I don't feel  
11 like there is a good solution to this either  
12 way on either decision, whether we vote it up  
13 or we vote it down. But there are some things  
14 that do trouble me about it.

15 CHAIR STONE: Thank you, Tracy.  
16 Are there other -- Francis.

17 MEMBER THICKE: Well, on that  
18 point, Tracy, if you like chemistry, I did a  
19 calculation. Some of the research shows that  
20 the streptomycin would show up in apples at a  
21 level of up to 18 parts per billion. And if  
22 you do a calculation and you take an apple

1 that weighs about a quarter of a pound, and  
2 you calculate how many molecules of  
3 streptomycin would be in that apple at one  
4 part per billion, I'll bet you couldn't guess  
5 how many molecules would be in there. It is  
6 23 quadrillion. That is 23 times ten to the  
7 15th molecules of streptomycin will be in that  
8 apple at one part per billion. I have my  
9 calculation right here if you want to see it.

10 CHAIR STONE: Others? Tracy.

11 MEMBER FAVRE: Just one thing I  
12 did neglect to mention earlier but is actually  
13 sort of the foundation of it for me is the  
14 soil food web itself is impacted. There are  
15 some studies that show that in the soil  
16 causing an elimination of some of the  
17 bacterial populations and it specifically says  
18 eliminated species were described as  
19 beneficial bacteria involved in various  
20 metabolic processes, mineralization, and  
21 organic compounds.

22 So unfortunately, we start this

1 downward spiral as far as soil food health, as  
2 far as the things that might actually lead to  
3 the trees themselves and their ecosystem  
4 increasing their own immunity to some of these  
5 problems.

6 And it certainly has, I believe  
7 this material has a greater impact than the  
8 oxytetracycline.

9 CHAIR STONE: Thank you, Tracy.  
10 Zea.

11 MEMBER SONNABEND: I'm sorry,  
12 Francis, but I just have to challenge that  
13 perception because it doesn't mean anything  
14 unless you compare it to how many trillion  
15 molecules are in a human dosage of that or how  
16 many trillion molecules would cause a microbe  
17 to become resistant to that. It doesn't  
18 matter how many trillion molecules are in an  
19 apple.

20 CHAIR STONE: Harold?

21 MEMBER AUSTIN: Okay. Just to  
22 quote from Kenneth Mandley from the Organic

1 Tree Fruit Association, and this is part of  
2 their written public testimony. Objections to  
3 the use of the antibiotics for fire blight  
4 management tend to be philosophical, rather  
5 than scientifically-based. Current strains of  
6 the antibiotic resistance in human and animal  
7 pathogens have been conclusively linked to the  
8 overuse of antibiotics in animal and medical  
9 systems. However, no such linkage has been  
10 shown for antibiotics supplied to a plant  
11 pathogen. In fact, quite the contrary.

12 Recent published research from the  
13 University of Wisconsin, based on ten years of  
14 annual antibiotic applications to several  
15 orchards have showed no increase in antibiotic  
16 resistant microorganisms when compared to the  
17 unsprayed orchard environments.

18 CHAIR STONE: Francis.

19 MEMBER THICKE: Zea is correct  
20 that there needs to be a threshold to make an  
21 effect. No doubt about that. However, some  
22 people are more sensitive than others. I know

1 personally some people who have to actually,  
2 on person in particular, has to leave Iowa  
3 every summer when the spraying of corn begins  
4 and move to Upper Peninsula of Michigan  
5 because her physician said she is  
6 hypersensitive. And so some people.

7           Again, a trillion, a quadrillion  
8 molecules, well, we have about a trillion  
9 cells in our body. It is a big number and  
10 things happen on a cellular level, on a  
11 molecular level. So, we don't know what these  
12 effects will be. And people, when they buy  
13 apples, they don't expect that to be in there.

14           But you are right. There is a  
15 threshold effect. We don't really know what  
16 it is and science hasn't totally defined these  
17 things on safety, I don't think.

18           CHAIR STONE: Jay.

19           MEMBER FELDMAN: The testimony we  
20 got from the medical community suggested that  
21 lower level exposures could be, and likely  
22 are, more problematic when it comes to

1 resistant genes developing. So, if you have  
2 low levels of exposure, and we know this from  
3 even taking medications that if you don't  
4 complete your dosage, you are leaving behind  
5 potentially stronger strains of this stuff.

6 But to follow-up on Harold, the  
7 technical review had a reference to Yoshihiro  
8 and McManus 2012 and they said it is possible  
9 that streptomycin could select for novel  
10 resistant genes in apple orchards, even if the  
11 overall frequency of resistant bacteria is not  
12 increased. A greater diversity of mobile  
13 resistant genes in apple orchards could lead  
14 to horizontal gene transfer of resistance,  
15 among a greater range of bacteria, which in  
16 turn could be consumed on fresh produce.

17 And so this is complex. And we  
18 spent a lot of time discussing this idea that  
19 low level residuals of the antibiotic in the  
20 orchard does move to affect resistance in  
21 genes. And those do move and there is a  
22 transfer that occurs.

1                   So, you know you can take any  
2 piece of this puzzle and talk about it but if  
3 you don't talk about the whole environment and  
4 the context in which we live with genes and  
5 how the transfer occurs from food to humans,  
6 from environment to other microbes, to other  
7 bacteria, to humans, then you don't really  
8 have the full picture on this.

9                   And so you know I guess the other  
10 bottom line here, as you recall from the last  
11 conversation we had on this was the consumer  
12 concerns about antibiotics used in organic  
13 production. And that is sort of a hanging  
14 over our heads in the environmental community  
15 that we have allowed the use of antibiotics.  
16 I think what saves the environmental community  
17 on this issue is that there has been very  
18 limited use and the uses that we have allowed  
19 and are now phasing out.

20                   But I think there is probably  
21 agreement that most people assume that  
22 antibiotics are not used in organic

1 production.

2 CHAIR STONE: Seeing no other  
3 hands, I will reference that as a grower I  
4 don't grow tree fruit, but a perennial crop  
5 like this and knowing how prudent growers are  
6 in following label recommendations how they  
7 are following, John, 205.206(e), how they are  
8 managing the crop, then the expense of this  
9 material, certifiers are verifying and working  
10 with them that they are following 205.206  
11 before they implement these sprays, that they  
12 are doing everything they can. They only  
13 spray it when they are having the weather  
14 conditions, the modeling is right. And it is  
15 such a valuable tool that I guess I am  
16 personally reluctant to take that away from  
17 them for a couple more years until we get more  
18 tools that would be better tools.

19 Jay?

20 MEMBER FELDMAN: You know I agree  
21 with that generally, but we did visit an  
22 orchard where the grower was spraying

1 prophylactically. And he found in his own  
2 experience that it was best and more efficient  
3 and effective to spray on a calendar. I'm not  
4 saying that that is the norm or that the  
5 industry even endorses that as a practice but  
6 when you are dealing with a material that has  
7 the consequences that these do, then we don't  
8 have a lot of room for error on something like  
9 that.

10 CHAIR STONE: Harold?

11 MEMBER AUSTIN: A couple of  
12 points. I think the one thing that I failed  
13 to stress when we started this presentation is  
14 that both the majority and the minority  
15 positions are both in support of streptomycin  
16 delisting and Sunsetting off. I think it is  
17 just our differences of opinion are when that  
18 should occur.

19 I think a couple of the points  
20 that we should consider is what impact does an  
21 extension have or not have on the  
22 stakeholders. All the stakeholders. Not just

1 the consumers but the handlers, the producers,  
2 the retailers, everybody.

3 What would that decision impact?  
4 How will it impact the supply chain? How  
5 would this decision impact consumers? All  
6 consumers, not a select group of consumers but  
7 all organic consumers.

8 Truly, what are the real risks for  
9 granting an extension for the large use,  
10 knowing that the use patterns pose significant  
11 increases? Will they propose significant  
12 increases in human health? We have had two  
13 varying points of view. Which one is right?  
14 Which one is wrong? There is a balance there.

15 I think we all, at the end of the  
16 day, agree that this material needs to take  
17 and get de-listed. It is just a matter,  
18 again, whether it is 2014 or 2017. This is  
19 not a new material but it is one that has been  
20 on the National List of approved materials for  
21 several years, being allowed for use in  
22 organic -- for organic growers to use and

1 build on their organic crops.

2 So, we visited businesses. We  
3 have had other companies, besides just the  
4 producers that have built their businesses  
5 upon an expanded growth in organic production.  
6 We need to take and consider not with just  
7 this material but with all materials, the  
8 impact that we will have, our decisions will  
9 have, on all organic stakeholders.

10 Thank you.

11 CHAIR STONE: Nick.

12 MEMBER MARAVELL: Jay, I would  
13 just like to make a comment because we were in  
14 that orchard together where the farm manager  
15 was spraying prophylactically. Just to give  
16 you a little bit of context for that, we have  
17 heard that the history of a specific orchard  
18 or location is important. And that particular  
19 orchard he did give us the history. It was  
20 heavily infested with blight. The problem is  
21 how long do you hold on to that history. And  
22 I think you have a very legitimate concern

1 that they may have been holding on to that  
2 history way too long.

3 But I just wanted to say that  
4 growers, even this grower who you say was  
5 doing it prophylactically, was responding to  
6 his history and I don't know what the research  
7 or the data would say when does that history  
8 of a severe infection fade. It is too  
9 complicated of a formula for me to be able to  
10 render an opinion on that.

11 Any other? Zea.

12 MEMBER SONNABEND: Okay, I know we  
13 need to wrap this up or we will never finish  
14 today but I just want to, although it was in  
15 the public docket, bring out one paragraph of  
16 the testimony from the Infectious Disease  
17 Society of America. And they say much work  
18 must be done to improve our scientific  
19 understanding of the risks that antibiotic use  
20 in orchards poses to human health. We do not  
21 yet understand the magnitude, extent, and  
22 duration of the human exposure to streptomycin

1 that may result from environmental application  
2 to fruit trees. We do not understand the  
3 environmental effects of streptomycin in soil  
4 and water. Most importantly, we do not fully  
5 understand the extent to which bacteria with  
6 antibiotic resistance genes can be transferred  
7 to humans through food and water supplies or  
8 from the environment, following application of  
9 streptomycin from fruit trees.

10 Accordingly, the IDSA strongly  
11 supports an expanded federal research agenda  
12 to address these questions.

13 IDSA goes on to support the  
14 minority position under essentially the  
15 precautionary principle, which certainly, from  
16 where they are coming from, makes perfect  
17 sense. But I submit to you that these  
18 contentions that we just don't have enough  
19 science backing to prove any of the risks that  
20 are being hypothesized a great deal have meant  
21 that organic farmers have been operating in  
22 entire good faith, trying to maintain their

1 livelihood using the best practices possible  
2 that they understand to ensure both the health  
3 of their trees, as well as the health of the  
4 people who eat their fruit.

5           And while I realize that this is  
6 probably going to go along the same voting  
7 lines that we did last time, I just really  
8 feel that to support these growers who are  
9 operating in good faith to make a reasonable  
10 transition to the products that would be more  
11 efficacious and less hypothetically impacting  
12 on the environment makes sense by having a  
13 longer term transition for them and keeping  
14 the material for another three years.

15           CHAIR STONE: Jay.

16           MEMBER FELDMAN: The complication  
17 here is both scientific. Obviously, there is  
18 a precautionary principle built in there. We  
19 also had perhaps the leading infectious  
20 disease doc in the country and maybe the  
21 global community, Glen Morris speaking. And  
22 he was very clear. He said I think if you say

1 we wait for more studies, we are potentially  
2 taking years and a lot of money. And again,  
3 while I am not speaking officially for IDS, I  
4 believe there is a letter from IDSA in your  
5 docket. And again, feeling very strongly from  
6 the Infectious Disease Society of America, you  
7 know it is time to do it now.

8           So, he has done a lot of work in  
9 animal agriculture and we certainly have, I  
10 think, agreement in this room, probably, that  
11 antibiotics in animal agricultures are a  
12 serious problem, and is using his experience  
13 from that to extrapolate data in terms of  
14 horizontal gene transfer.

15           So, that is the science. But now  
16 we are faced with the assurances that we do  
17 move away from these materials. That has been  
18 the difficulty with this particular material.  
19 And the juxtaposition of not having assurances  
20 through the process by which we -- I mean this  
21 is a proposal to put the material into the  
22 cycle again so two or three years from now we

1 will having or the Board will be having the  
2 same conversation with a whole new set of  
3 folks. And who knows how it will go at that  
4 point.

5           So, we need assurances. We needed  
6 assurances six years' ago, when the Board  
7 originally took this up four years' ago now,  
8 and many people on this Board discussed it.  
9 And assurance is only as good as the people  
10 that agree to it. And we will have all new  
11 folks sitting around the table, for the most  
12 part, when this comes up again.

13           So, I think the time is now. I  
14 agree with Dr. Morris. There is always going  
15 to be with science questions of uncertainty.  
16 Always. But you have got to take what you  
17 know from how resistance has operated. And by  
18 the way, you all know we are seeing a higher  
19 degree of resistance with streptomycin than we  
20 even saw with tetracycline. And the  
21 expectation is we are going to see elevated  
22 resistance to tetracycline in the orchard

1 environment as well.

2 So, all the signals are there for  
3 us. The data of the horizontal gene transfer  
4 is there. The resistance, the bacterial  
5 resistance is there. The consumer concern  
6 about exposure is there. The ultimately -- I  
7 can't think of a stronger case for -- and more  
8 deliberation and assessment that has gone on  
9 any one chemical.

10 So, thank you.

11 CHAIR STONE: Harold, is the lead  
12 all through there? Do you want to wrap up?  
13 Or Zea? I'm not sure where you all here.

14 MEMBER SONNABEND: Yes, I think we  
15 are ready to move on. We will vote tomorrow.  
16 And if perhaps we will have a bit more  
17 discussion at that time or make statements  
18 before voting.

19 Next is magnesium oxide petitioned  
20 item. Lisa will introduce this.

21 DR. BRINES: Thanks, Zea.

22 The petition for magnesium oxide

1 was received on February 13, 2013 and was  
2 submitted by Mesa Verde Resources. It is not  
3 currently included on the National List and  
4 has been petitioned for addition to Section  
5 205.601 as a synthetic substance allowed for  
6 use in organic crop production.

7 There is no technical report that  
8 was requested in response to this petition.  
9 The petition was on the agenda for the October  
10 2013 NOSB meeting that was canceled. So,  
11 there is a subcommittee proposal from that  
12 meeting that has been revised in response to  
13 public comment with the minority opinion  
14 added.

15 Thanks.

16 MEMBER SONNABEND: Okay, Francis,  
17 I believe you are going to walk us through  
18 this one.

19 MEMBER THICKE: Okay. What is  
20 proposed or petitioned for magnesium oxide is  
21 petition to be an agent to control the  
22 viscosity of a clay suspension. Can you hear?

1       Okay, I'm sorry.

2                       Magnesium oxide is petitioned to  
3       be an agent to control the viscosity of a clay  
4       suspension agent used to apply fine humates to  
5       soils or plants, perhaps. And so, it is used  
6       at very small level, a very low level.

7                       And in the Committee -- well, just  
8       basically back to the comments, last fall  
9       there were eight comments and for the spring,  
10      there were an additional six comments. And  
11      actually all the comments were opposed to the  
12      petition being -- the addition of magnesium  
13      oxide to the National List. However, the  
14      committee voted to add it to the list, eight  
15      to zero.

16                      And the comments mostly centered  
17      on the fact that it maybe wouldn't be renewed  
18      in five years, asking if it could be renewed  
19      -- if an annotation could be put in to require  
20      magnesium oxide to be revisited again in five  
21      years.

22                      There was also one concern about

1 there is a small amount of acid used in the  
2 making of the magnesium oxide.

3 The annotation -- let's see. The  
4 annotation for the listing motion was for use  
5 only to control the viscosity of a clay  
6 suspension agent for humates. And then the  
7 additional, the minority position that came on  
8 since last fall added to that annotation to  
9 list magnesium oxide with the following  
10 annotation: until May 1, 2019 or five years  
11 after the date it is first allowed.

12 So it would be only listed until  
13 that time period. And the justification given  
14 for that is that a synthetic material used in  
15 organic production, even if used in small  
16 quantities, must meet all the off-public  
17 criteria.

18 Current consideration of the  
19 material has raised issues related to the  
20 environmental impacts and alternatives. One,  
21 the review in five years must be performed  
22 with the same standard for allowing continued

1 use as is used to approve use in the first  
2 place. Two, the need for liquid humates and,  
3 hence, magnesium oxide, should be reevaluated.  
4 Three, the possibility of using non-synthetic  
5 acids in place of synthetic sulfuric acid must  
6 be reevaluated.

7 So, I guess that is the base  
8 starting here.

9 CHAIR STONE: Questions from the  
10 Board, other people on the Committee?  
11 Comment?

12 Zea, are we thinking we are going  
13 to go ahead and vote on this or will you wait  
14 on everything?

15 MEMBER SONNABEND: I will leave  
16 that to the discretion of the Chair, but I do  
17 have a comment, if no one else is going to  
18 talk.

19 CHAIR STONE: Please.

20 MEMBER SONNABEND: Okay. I think  
21 -- I can't speak for everyone in the majority  
22 position but I think it is safe to say that

1 the reason that the minority position did not  
2 become the majority position is because most  
3 people don't feel that inserting into each  
4 material something you didn't like about the  
5 Sunset process in general is an appropriate  
6 way to approach this issue.

7 And so, the majority feels that it  
8 should go be voted on to the National List in  
9 a normal fashion, where it will get thoroughly  
10 reviewed in five years whether there is an  
11 expiration date in three years or not.

12 Because a fixed expiration date, when you  
13 don't know when a rule is coming out, is not  
14 five years. It could be four, three, two, who  
15 knows how long.

16 CHAIR STONE: Other committee  
17 members?

18 MEMBER BONDERA: Sorry. It does  
19 say, Zea, or five years after the date it is  
20 first allowed.

21 MEMBER SONNABEND: Nonetheless,  
22 the reason I think it is --

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CHAIR STONE: Jay.

MEMBER FELDMAN: Yes, I guess we may be having this conversation a lot, unfortunately, and usually it is tied to some potential environmental effect that we talk about uncertainty with streptomycin. We talk about uncertainty with magnesium oxide. As I said earlier, a lot of these things have a degree of uncertainty associated with a full degree of adverse effects. That is why it is important to default at the end of a year to a relisting process, where the Board reaffirms that this still meets the OFPA criteria.

You know, there is a real high heat -- I mean Calvin -- I mean sorry -- Francis, you evaluated this and there was this limestone process and then there was a salt brine process, which seemed to be less effective, perhaps for commercial purposes. And so we are dealing with a process, a high heat process that releases carbon dioxide through fossil fuels to achieve the high heat

1 required to decompose the limestone.

2           So, it is not as if this is  
3 something you are cooking up in your kitchen.  
4 you know there is an, albeit limited,  
5 environmental impact associated with this,  
6 although, I think some of my friends in the  
7 climate change community would not like to see  
8 the release in the organic community of  
9 additional carbon dioxide.

10           But the point here is that we, as  
11 a Board, have the opportunity to say there is  
12 a potential environmental insult here that we  
13 could incentivize alternatives for and the  
14 best way to do that is to require that in five  
15 years or five years after the rulemaking  
16 finishes, that the Board again makes an  
17 affirmative decision to keep this on the list,  
18 based on any new science on this carbon  
19 dioxide or hopefully the salt brine process  
20 will be better commercialized or something.

21           Whatever it is, creating that  
22 incentive is important. So, that is the

1 purpose of expiration date.

2 MEMBER SONNABEND: So, Mac, I  
3 don't see why we couldn't vote, unless anyone  
4 feels like they are going to find out  
5 something additional between now and Friday  
6 that they want to wait. Okay.

7 CHAIR STONE: John?

8 VICE CHAIR FOSTER: I didn't think  
9 about it until Zea and Jay just talked about  
10 those items but this is, I am finding truer  
11 and truer with all materials, that a lot of  
12 the dialogue speaks as if we are putting tons  
13 of these materials onto the ground. And given  
14 the use of this, the context of this use, it  
15 is just not the case. And I feel like a lot  
16 of the dialogue comes around that makes it  
17 sound like we are putting a lot of this  
18 product on.

19 But in the context of the limited  
20 use of something in humates, humates aren't  
21 added in large volume, certainly not relative  
22 to other inputs in organic production. I

1 don't -- I can't think. I don't know what the  
2 numbers would be. But it would be a fraction  
3 of a fraction of a percent of other kinds of  
4 input. So, the magnesium oxide portion of  
5 humates is even smaller than that.

6           And I want to, I guess, drive that  
7 point home because what I hear, if I didn't  
8 know the use of humates or magnesium oxide  
9 component, the fraction in humates, I would  
10 think this is a horrible, horrible thing. And  
11 I would like to remind everyone that we have  
12 a context for these materials. Magnesium  
13 oxide is a fraction of an infrequently used,  
14 relative to all inputs in organic, it is an  
15 infrequently used input. And I am hoping we  
16 can keep that context in mind. Those of you  
17 who know me know that this is not the first  
18 time I have said this.

19           But this dialogue right here makes  
20 it sounds like it is a much larger issue, in  
21 terms of volume than I think it will be and I  
22 would like to just remind us of that.

1 CHAIR STONE: So, I'm thinking in  
2 the essence of time, we are running late, but  
3 also to give Board members time to converse  
4 with each other at dinner and whatnot about  
5 these specific materials, about this  
6 discussion of scale, if you will, or use,  
7 normal use, et cetera, we will defer all votes  
8 until Friday. I think we will have enough  
9 time on Friday so we can openly deliberate and  
10 note bog down in vote-taking today, Zea, if  
11 that is all right with you.

12 Okay, anything else on magnesium  
13 oxide?

14 Okay, next up.

15 MEMBER SONNABEND: Okay, the next  
16 is the petitioned item new for this meeting,  
17 vinasse. Lisa?

18 DR. BRINES: Thanks, Zea. The  
19 petition for vinasse was submitted on March  
20 27, 2012. The petitioner is BioBizz Worldwide  
21 N.V. The material is not currently included  
22 anywhere on the National List and the petition

1 requests the inclusion of vinasse at Section  
2 205.601 as a synthetic substance allowed for  
3 use in crop production.

4 In support of its review, the  
5 Crops Subcommittee requested a limited scope  
6 technical evaluation report to assist in the  
7 classification of this material. That report  
8 is posted on the NOP website. Thanks.

9 MEMBER SONNABEND: Thank you,  
10 Lisa. I am the point person on this one.

11 This material has been on our work  
12 plan almost since I joined, which is about two  
13 years plus. It is complicated and it has  
14 taken us a very long time to get to this  
15 point. We had a limited scope TR done, as it  
16 says in the posted document, only on the  
17 question of whether it was synthetic or non-  
18 synthetic and what forms of it would be  
19 considered synthetic or non-synthetic.

20 It is confusing because it is  
21 called vinasse, whether it has additives added  
22 before the fermentation and the production

1 step or after the fermentation and production  
2 step, which is similar to molasses and some  
3 other non-synthetic things that are on the  
4 list of allowed things.

5 So, what we came to was that the  
6 stages of extracting sugar and making molasses  
7 are non-synthetic processes. To the extent  
8 that the last step in vinasse is a  
9 fermentation process to turn the molasses into  
10 vinasse, and that is a naturally occurring  
11 biological process, as are the other steps  
12 that are involved in vinasse, and so the  
13 product coming out of the fermentation would  
14 be considered non-synthetic.

15 Our problem comes with additives  
16 that are added after the fermentation process  
17 is complete. And these additives consist of  
18 all sorts of things, antimicrobials, ammonium  
19 compounds, even antibiotics or chlorine  
20 sometimes, and there is the danger of nitrogen  
21 fortification.

22 So, we decided, in the Crops

1 Subcommittee, that we needed to distinguish  
2 the non-synthetic from the synthetic forms.  
3 And that is where our majority position came  
4 from, which was to classify it as non-  
5 synthetic but then to use the guidance  
6 documents on the classification of materials  
7 and the permitted substances list to clarify  
8 which things were and weren't synthetic.

9 We got public comments from  
10 relatively few, considering that it is a  
11 fertilizer material. But the gist of many of  
12 the public comments, both supporting minority  
13 and majority, was to get the classification of  
14 materials guidance finished. We are saying we  
15 are using in order to make these decisions but  
16 it is only proposed guidance and we would have  
17 a lot surer footing if we were dealing with  
18 final guidance. So, that is out on the table  
19 for everyone to hear.

20 We got a couple of certifiers in  
21 OMRI who support the majority position, feel  
22 that we have made a good distinguish of what

1 is non-synthetic and what is synthetic. And  
2 that the MROs in the certifiers and OMRI are  
3 capable of doing a good review process, using  
4 the guidelines that we have proposed.

5           However, PCO pointed out that we  
6 were proposing language to modify the guidance  
7 when we didn't necessarily have the authority  
8 to do so and please clarify what the procedure  
9 for amending proposed guidance or final  
10 guidance would be, so that they could petition  
11 to do it in the future presumably. They don't  
12 say that but they would like it to be  
13 clarified.

14           OMRI would like further guidance  
15 on what fortification means with nitrogen,  
16 which has been a big stumbling block in  
17 approving some of theirs.

18           All the certifiers and OMRI did  
19 not think the minority position was workable  
20 because it was too complicated and showed lack  
21 of confidence in the MROs who review  
22 materials.

1                   Now, Beyond Pesticides and  
2                   Cornucopia pointed out that the motion the way  
3                   it is posed on non-synthetic is not binding on  
4                   the NOP to offer the clarification and that we  
5                   are only proposing to have the clarification  
6                   of what non-synthetic is in guidance and  
7                   Beyond Pesticide has suggested that we put the  
8                   clarification on what was non-synthetic in the  
9                   actual definition.

10                   And we heard that. It was a good  
11                   suggestion and so we have proposed a  
12                   substitute motion -- Michelle, if you have  
13                   that slide and could be getting it up while I  
14                   talk -- where we have used language motion to  
15                   put into the first motion to make a better  
16                   actual determination on what non-synthetic  
17                   vinasse means in our motion.

18                   Cornucopia also urged us to adopt  
19                   a motion that defines the distinction between  
20                   synthetic and non-synthetic and should be  
21                   independent of the draft guidance.

22                   Several commenters wrote in

1 parrotting Beyond Pesticides' comments, three  
2 of them.

3 And I am going to let Jay present  
4 the minority view in a second but the minority  
5 view proposed roughly putting vinasse onto  
6 both 602 and 601; 2 as prohibited, 1 to  
7 prohibit the synthetic forms. And well, he  
8 has to explain it.

9 It made very little sense to me as  
10 well as to certifiers because 601 is for  
11 allowed synthetics and he is proposing to put  
12 an allowed non-synthetic -- the synthetic  
13 forms as a prohibited synthetic.

14 So lastly, I want to point out  
15 that because this is a petition that came to  
16 us for a synthetic non-synthetic determination  
17 and nobody wants to put synthetic forms of  
18 vinasse onto the national list that is in our  
19 group, as near as I can tell. If this vote  
20 fails for the majority motion, the status quo  
21 of what is going on in the community is  
22 maintained and it is out of the NOSB's hands.

1                   So, that means MROs will be  
2 continued to make their own decisions and we  
3 will be offering them no guidance whatsoever.

4                   So, that being said, Mac, you want  
5 to take it away to call on Jay for the --

6                   CHAIR STONE: Yes. Jay.

7                   MEMBER FELDMAN: Yes, thanks.  
8 Thanks, Zea.

9                   So the Subcommittee convened again  
10 and took the suggestions from the comments and  
11 agreed with the motion unanimously, I believe,  
12 to amend the motion to include the guidance  
13 language that was in the motion into one  
14 streamlined motion.

15                   I guess the idea is to also ask  
16 the NOP but, of course, there is no assurance  
17 on that but to request that the NOP consider  
18 putting this into guidance at some point as  
19 soon as possible.

20                   So, in effect, that means that the  
21 minority motion is being and has been  
22 withdrawn because the proposals that came in

1 through the public comment period proposed  
2 more streamlined approach.

3 I am a little nervous, though the  
4 reason I was hoping to get something into the  
5 National List is because that provides the  
6 greatest assurance that any restrictions that  
7 this Board wants to impose or recommends  
8 imposing on a material would be incorporated  
9 into the National List by the Secretary.

10 So, this is a little unique, in  
11 some respects, because this is a motion on  
12 synthetic/non-synthetic with a qualifier. I  
13 don't think I have ever voted on one like that  
14 before. Have you, John?

15 So, I guess it is going to be out  
16 there and the MROs will rely on it as they  
17 make their determination when vinasse products  
18 come through the door. I hope it works.

19 CHAIR STONE: And I would like to  
20 program -- Melissa, maybe, so, we have heard  
21 that significant changes not be allowed on  
22 short notice but Zea and the Committee

1 consulted with the Program that this was a  
2 clarification, not a significant change. If  
3 maybe you want to address that conversation a  
4 little bit. Substantive change.

5 DR. BAILEY: Substantive. Yes,  
6 sure.

7 Yes, we received a request from  
8 the Crops Committee to add some of the  
9 language that was really already part of the  
10 posted proposal for the public, just into the  
11 classification motion. And based on running  
12 it through the criteria we presented yesterday  
13 about substantive change, we still felt that  
14 people would understand what the Board was --  
15 or what the Subcommittee was trying to propose  
16 and just adding that language to the  
17 classification motion is really just a  
18 clarification.

19 CHAIR STONE: Good. Thank you.  
20 Since that is new, I want to be sure we open  
21 that up.

22 Any other questions or thoughts

1 from the committee? Nick?

2 MEMBER MARAVELL: Zea, does this  
3 mean that the second motion is no longer in  
4 play or to be voted on? It seems to be an  
5 identical restatement of the first motion but  
6 only oriented towards guidance.

7 MEMBER SONNABEND: I was planning  
8 to keep the second motion and have it voted on  
9 so it would be clear to the NOP that we would  
10 like this added to the guidance. But if Board  
11 members and/or the NOP feel assured that that  
12 would happen anyway, then we don't need to  
13 have the second motion. But it had been my  
14 plan to keep the second motion.

15 And can everyone read it okay or  
16 do you need me to read it to you? And that  
17 includes the audience.

18 CHAIR STONE: I would like you to  
19 read it and clarify the -- please read it and  
20 clarify.

21 MEMBER SONNABEND: Okay. So, the  
22 original motion -- well, we had two motions.

1 One was a determination for classification and  
2 the other was for the guidance. The original  
3 motion for classification was just to classify  
4 vinasse as non-synthetic. The proposed change  
5 to the classification motion is move to  
6 classify vinasse, which does not contain  
7 prohibited additives, such as pH adjusters,  
8 sanitizers, ammonium compounds, antibiotics,  
9 or chlorine materials, and is not fortified  
10 with nitrogen as non-synthetic.

11 So, that went through the  
12 subcommittee; six yes, zero no, zero abstain,  
13 and one absent.

14 Is that clear? Does anyone need  
15 further explanation?

16 MEMBER BONDERA: Zea, I just  
17 suggest that you go ahead and repeat what the  
18 second motion is, too, please. Because it is  
19 not -- as a member of the Crops Subcommittee  
20 for a bit, I remember it not being super clear  
21 to me that that is, like you have already  
22 said, just guidance. And then repeating that

1 would be appropriate.

2 MEMBER SONNABEND: Thank you. The  
3 second motion is to -- and this is exactly  
4 what is posted. Motion to add specific  
5 language for a listing of vinasse in the  
6 guidance on materials for organic crop  
7 production, NOP 5034-1. Vinasse may not  
8 contain prohibited additives, such as but not  
9 limited to, pH adjusters, sanitizers, ammonium  
10 compounds, antibiotics, or chlorine materials  
11 that are not provided for at 205.601.  
12 Nitrogen levels may not be fortified.

13 CHAIR STONE: Colehour?

14 MEMBER BONDERA: So, I personally  
15 feel like us leaving this as a motion, like  
16 Zea suggested, makes the most sense from the  
17 perspective of -- I hesitate to say it but --  
18 uncertainty that I want to turn back to the  
19 Program and ask if, like people said, like Jay  
20 said, has there even been a -- sorry I am not  
21 speaking into the microphone -- a  
22 classification motion that is along those

1 lines before and has the Program really dealt  
2 with one like that. Because that uncertainty  
3 makes me think that the second motion is  
4 necessary because of that. I don't know if  
5 you have any response or not.

6 CHAIR STONE: Miles.

7 MR. McEVOY: Yes, I think that  
8 this is exactly the kind of advice,  
9 recommendations that we are looking for from  
10 the Board is on materials. This is where we  
11 really want your expertise and the viewpoint  
12 of the community as a whole on these difficult  
13 material issues. So, I think moving forward  
14 with this, whatever your final determination  
15 is, will very much help us in terms of  
16 clarifying the standards and the requirements  
17 to organic producers, specifically.

18 So, the second motion of  
19 recommending that it goes into the final  
20 guidance would help us in terms of moving  
21 forward with that clarification.

22 In addition, I think people should

1 re-familiarize themselves with the  
2 introduction to the Program handbook, where it  
3 talks about the development of the documents  
4 in the Program handbook. At any time, anyone  
5 can submit comments to the documents in the  
6 Program handbook, through NOP guidance at  
7 USDA.gov. So, those documents are alive and  
8 can be modified with comments and with  
9 discussion or recommendations from the Board.

10 So, that is the whole concept of  
11 that Program handbook is that it will continue  
12 to improve with input from the Board and the  
13 organic community.

14 CHAIR STONE: Nick, are you good?  
15 Jay.

16 MEMBER FELDMAN: Yes, I think I  
17 heard two parts to Colehour's question. Maybe  
18 I was reading into it. But I would like to  
19 verify with the Program that if this were to  
20 pass, as Zea has read it, that the Program  
21 would publish it as a two-part action by the  
22 Board, one being the synthetic determination

1 with that qualifying language and two, the  
2 second motion being a recommendation on  
3 guidance, publication of guidance.

4 And the reason I am raising this  
5 is because as you know, we have had other two-  
6 part motions or votes where the Program chose  
7 the second motion, to implement the second  
8 motion, not the first. It is not exactly  
9 analogous but there is a possibility, I guess,  
10 out there that the Program could determine,  
11 perhaps, hypothetically, that maybe a  
12 synthetic or non-synthetic determination with  
13 qualified language is not appropriate, that  
14 that is just a yes or no vote, up or down, and  
15 that a qualification Zea is proposing here and  
16 the subcommittee voted on would not be  
17 included with that motion.

18 I that were the case, I would feel  
19 that that didn't fairly carry out at least  
20 what the subcommittee was hoping would be  
21 done.

22 Does that --

1                   MR. McEVOY: I'm not sure I am  
2 following you. The Board passes  
3 recommendations that go to the Program and  
4 then we take those recommendations and respond  
5 to them.

6                   So, are you asking for us to  
7 respond to what we are going to do with your  
8 recommendations now before you pass the  
9 recommendations?

10                  MEMBER FELDMAN: Maybe a little  
11 heads up would help.

12                  You know it seems pretty  
13 straightforward but what this subcommittee is  
14 hoping to do is to get into the synthetic/non-  
15 synthetic determination or motion, qualifying  
16 language. If the program feels that that is  
17 inappropriate or outside the scope of  
18 allowable motion on synthetic/non-synthetic,  
19 it would be nice to know that now.

20                  DR. BAILEY: Yes, I think to your  
21 last question there, part of the reason we had  
22 the conversation leading up to this meeting

1 about adding the qualifying language is that  
2 we felt that would be fine to put on the  
3 table. So, hopefully, that addresses your  
4 question.

5 MEMBER FELDMAN: Politically  
6 stated beautifully.

7 CHAIR STONE: Zea, -- one second  
8 Jean -- what was the vote on the original  
9 second motion?

10 MEMBER SONNABEND: Four to three.

11 CHAIR STONE: Okay.

12 MEMBER SONNABEND: The minority  
13 voted against it, the same minority that voted  
14 against the first one.

15 CHAIR STONE: Okay. Jean, you are  
16 up.

17 MEMBER RICHARDSON: I would just  
18 like to hope -- I am not on your Subcommittee  
19 -- that you would vote on both motions.

20 MEMBER SONNABEND: I don't see why  
21 we couldn't. I mean at worst, it is  
22 redundant. So, we might as well.

1 CHAIR STONE: Yes, I saw it as a  
2 one and a two, myself.

3 Any more thoughts, clarifications?  
4 Crystal clear?

5 MEMBER SONNABEND: So, do you want  
6 to hold the vote until tomorrow?

7 CHAIR STONE: I do, just in time.

8 MEMBER SONNABEND: Okay.

9 CHAIR STONE: And again, it gives  
10 us conversation and clarification.

11 MEMBER SONNABEND: Okay.

12 CHAIR STONE: Great.

13 MEMBER SONNABEND: So next up is  
14 laminarin, a petitioned item. And Lisa will  
15 tell us about that.

16 DR. BRINES: Thanks, Zea. The  
17 petition for laminarin was received on May 30,  
18 2013. It was submitted by SciReg Incorporated  
19 on behalf of Laboratoires Goëmar SA.  
20 Apologies for the pronunciation. It is not  
21 currently included anywhere on the National  
22 List and the petition requests the inclusion

1 of Laminarin at Section 205.601 as a synthetic  
2 substance allowed for use in organic crop  
3 production.

4 There was no technical evaluation  
5 report that was requested by the Subcommittee  
6 for its deliberations. And the Subcommittee  
7 proposal is posted online. Thanks.

8 MEMBER SONNABEND: Thank you,  
9 Lisa. I was the point person on this one as  
10 well.

11 So, in the laminarin petition,  
12 they gave a quite detailed explanation of  
13 their manufacturing process. We took a look  
14 at that, compared to the guidance  
15 classification draft and determined that it  
16 was an acid-based extraction and the end  
17 product of the acid base extraction left a bit  
18 of -- where is the name of it -- sodium  
19 sulfate, which did not appear to have a  
20 technical or functional affect. And so the  
21 majority of the Committee voted this as non-  
22 synthetic, with a vote of five to two.

1                   The public comment, we have  
2                   gotten, again, relatively little. The gist of  
3                   much of it was how can you base it on a  
4                   classification guidance that is still a draft  
5                   guidance. And we like final guidance to  
6                   determine if this really is acid-base  
7                   extraction and what you had in mind for  
8                   classification.

9                   We got several comments that were  
10                  criticizing us not evaluating according to the  
11                  OFPA criteria but the non-synthetic/synthetic  
12                  distinction comes first and only the  
13                  synthetics are evaluated, compared to the  
14                  criteria formerly in our deliberations.

15                  We got, among the public comment  
16                  that we got, was PCO suggested that we do send  
17                  it back for a TR to provide more guidance to  
18                  MROs on how to evaluate the product.

19                  OMRI supported the majority  
20                  opinion but disagrees with the last point, as  
21                  you heard Lindsay say today. Or was that  
22                  yesterday? But anyway, the sodium sulfate

1 does remain but OMRI would look at it as a  
2 List 4(a) inert and inerts are not something  
3 that we are reviewing at the same time as the  
4 generic materials.

5           Cornucopia and Beyond Pesticides  
6 felt that it was synthetic and supported the  
7 minority opinion and that it should be sent  
8 back for a determination of synthetic and,  
9 therefore, a full TAP review, TR.

10           I will mention, as I mentioned  
11 with vinasse, unlike vinasse where if the  
12 motion fails here, it is over, which was the  
13 case with vinasse, if this motion fails for  
14 calling it non-synthetic, it will go back to  
15 the Subcommittee and the Subcommittee will  
16 consider some of the points raised and decide  
17 whether to request a TR and bring it back for  
18 another synthetic/non-synthetic determination  
19 after we have a TR. And the TR, presumably,  
20 would look at it according the criteria that  
21 we use for synthetics.

22           So, then we got three public

1        comments that were very brief that supported  
2        Beyond Pesticides' position. And that is  
3        pretty much all the public comment we got.

4                    CHAIR STONE: Miles.

5                    MR. McEVOY: Yes, I just wanted to  
6        make a comment about the need for the final  
7        guidance on classification materials. We  
8        understand it is really, really important. We  
9        are working to get that out and we hope to  
10       have that out within the next few months.

11                   And but you do have -- yes,  
12        glacially moving through the python. You do  
13        have a lot of resources to utilize. You do  
14        have your final recommendation on the  
15        classification materials that you passed a few  
16        years ago. So, you have some really solid  
17        basis to utilize in the meantime, before that  
18        final guidance is out. And you also have the  
19        draft guidance, which is based on the NOSB  
20        final recommendation on classification  
21        materials.

22                   So, we do understand the

1 importance of getting the final guidance out  
2 and Lisa and Melissa are really pushing that  
3 glacier as quickly as possible.

4 CHAIR STONE: Jay.

5 MEMBER FELDMAN: For us works on  
6 this stuff, this is a lot of fun. So, if you  
7 want more fun next semester, joint the Crops  
8 Committee.

9 There are a lot of issues here  
10 that intersect with what the Board has done  
11 previously. First of all, I don't think  
12 anyone is now denying that there is a  
13 synthetic remaining in the final product.  
14 That is the case. What you call it or  
15 otherwise could be important to this  
16 discussion for a number of reasons. But the  
17 principle reason is that typically what a  
18 manufacturer has been done in recent years  
19 anyway, is petitioning the Board for the  
20 allowance of the inert ingredient. So, we  
21 have actually a lot of -- several materials in  
22 the queue to be reviewed by the Board or the

1 Subcommittee and then the Board, as inert  
2 ingredients. And this one might pass the  
3 test. It might just be a great example of one  
4 that might pass the test. Who knows? But the  
5 point is it has to be evaluated. It has to be  
6 evaluated by the Board and it should be  
7 evaluated at least at the same time as the  
8 materials being evaluated, but certainly not  
9 after the material has been evaluated.

10           And as you all know, this has been  
11 one of the biggest problems with pesticides  
12 generally, that inerts have gotten sort of a  
13 pass, in many ways. They are not subject to  
14 the same level of scrutiny as an active  
15 ingredient. And then, years later, you find  
16 out, oops, that inert was a real problem, in  
17 fact, more problematic than the active  
18 ingredient, which may be the issue here -- may  
19 or may not. We don't have the process in  
20 place yet to make that determination.

21           And that is my point. Since we  
22 don't have the process in place yet to review

1       inerts, my thinking on this, after spending a  
2       weekend with an EPA chemist who went through  
3       all the numbers and then Lisa Brines checked  
4       him out on the level of the actual sodium  
5       sulfate left in the material after this acid-  
6       based reaction that has been described. And  
7       you know those numbers are neither here nor  
8       there, except to establish that the material  
9       is there, which was confirmed by OMRI. So, we  
10      are not debating that issue, as I said.

11                 Since we don't have an inerts  
12      policy, it would be good, I thought, to  
13      evaluate this together. And I don't think it  
14      would even take a complete TR. I think, you  
15      could probably do a modified TR on this.

16                 It is bad precedent not to do  
17      that. It is bad precedent not to review these  
18      things. We have gotten in trouble with that  
19      before. So, we would send it back to  
20      subcommittee. We would do a modified TR on  
21      this particular inert and then move it through  
22      to the next meeting. That would be my

1 suggestion.

2 The other point you saw in OMRI's  
3 comments, which goes to the consistency  
4 question, is that other aquatic plant extracts  
5 are classified as synthetic under 205.601.  
6 So, it is not as if we don't have other  
7 synthetic aquatic plant extracts, which this  
8 would be, that are allowed in organic  
9 production. It is a matter of following the  
10 process so that we have dotted all our i's,  
11 crossed all our t's.

12 This would actually be an  
13 interesting case study for evaluating an inert  
14 on a pretty expedited basis. It is a 4(a),  
15 List 4(a) inert. It is one of the inerts that  
16 I would guess would probably pass the test but  
17 we have to go through that process.

18 CHAIR STONE: Lisa?

19 DR. BRINES: Yes, just a  
20 clarification, since my name was mentioned in  
21 the calculations. I did look at the  
22 calculations that Jay had forwarded. Just for

1 the record, I did have some concerns with some  
2 of the assumptions that were built into the  
3 calculations. I am not an EPA chemist but I  
4 didn't agree with the numbers that were  
5 calculated. Thanks.

6 MEMBER FELDMAN: And just -- I did  
7 not mean to misrepresent you. I didn't get  
8 that from your email. I guess I may have  
9 misinterpreted it. So, just for the record,  
10 just so folks in the future have this, there  
11 is a 624 parts per million sulfate and 299  
12 parts per million of sodium added to the final  
13 product. And because the kelp provides some  
14 buffering capacity, which is what Lisa  
15 originally contacted us about, the chemist at  
16 EPA told us that the quantities, because of  
17 this buffering effect, are probably somewhat  
18 higher than this calculation indicates.

19 I thought we had had your  
20 concurrence on this but I guess we don't.  
21 That is the feedback we got from the EPA  
22 chemist and I apologize for misrepresenting.

1 CHAIR STONE: Jean.

2 MEMBER RICHARDSON: My comment may  
3 be a little bit off point but I am going to  
4 make it anyway. Because when we are looking  
5 at the laminarin, whether or not it is  
6 synthetic or non-synthetic, which I think is  
7 a slightly confusing issues, as Jay has  
8 brought out, and lacks really perfect clarity  
9 from the scientific point of view.

10 The other thing that I am  
11 concerned if all the Crops Subcommittee looks  
12 at is the synthetic/non-synthetic and it is  
13 fine, oh, it is agriculture or non-synthetic,  
14 it goes forward, no one has actually taken the  
15 time then to look at all the other OFPA  
16 criteria. And so, I know the north coast of  
17 Britain, where they are getting this laminaria  
18 from and I don't know how much laminaria is  
19 being harvested to make this product. I don't  
20 know what its impact is on the aquatic  
21 ecosystem in that area. And so even though it  
22 is off point, because if it is non-synthetic,

1 then you don't have to look at those things.  
2 So, therefore, what I am saying is sort of  
3 moot. It is nonetheless, I think, something  
4 that is important for us to be thinking about  
5 as we deliberate on this nuance synthetic/non-  
6 synthetic, when there are, in fact, a number  
7 of other issues of conservation and biological  
8 diversity that we really need to keep in the  
9 back of our minds as we are looking at this  
10 as well.

11 CHAIR STONE: Zea.

12 MEMBER SONNABEND: Thank you.

13 Well, I just feel the need to correct what I  
14 see as inaccuracies in the statement that Jay  
15 just made because we do have an inerts policy  
16 in place. And the inerts policy that is in  
17 place is to allow List 4(a) and 4(b) inerts  
18 until we have another policy in place to  
19 replace that.

20 The inerts that were petitioned  
21 individually generally were petitioned because  
22 they are not on 4(a) or 4(b) already and they

1 would like some consideration. That was  
2 petitioned and it is on 4(a) and 4(b) -- then  
3 it is allowed and it will be reviewed in our  
4 regular inerts policy.

5 I am not saying that I am against  
6 sending this back and having a TR but I  
7 consider this residue to be an impurity and,  
8 as such an impurity, it could possibly be  
9 evaluated by a TR because it is synthetic but  
10 not because it is a 4(a) inert. Because it is  
11 a 4(a) inert, it should be allowed.

12 CHAIR STONE: Calvin.

13 SECRETARY WALKER: I would like to  
14 concur with Gene. My notes with magnesium  
15 oxide, as well as laminarin, I noted in my  
16 notes, no TR. And it has always been my view  
17 is that we should not look at just the  
18 petitioner's information. We need to use  
19 other form of information to make sure it meet  
20 all the criteria.

21 CHAIR STONE: So, I had a  
22 question. It says it is allowed by EPA as a

1 disease control. Who is using for what type  
2 of control and how much demand is there?

3 MEMBER SONNABEND: It is  
4 registered by the EPA for disease control. It  
5 is not yet, however, allowed in organic  
6 production and so we don't think any organic  
7 growers are using it. And we have no way of  
8 knowing what other growers might be using it.  
9 But that is why they petitioned is so they  
10 could have it allowed for organics.

11 MEMBER FELDMAN: As Jean said --

12 CHAIR STONE: Well my question is  
13 is commercial agriculture using it? Is it  
14 trees? Is it --

15 MEMBER SONNABEND: It is mildew --  
16 what were the other -- damping off type  
17 diseases and mildew were among the  
18 registrations.

19 CHAIR STONE: Okay, that is all I  
20 was asking.

21 Jay.

22 MEMBER FELDMAN: As Jean pointed

1 out, that was not the focus of our  
2 conversation because we were just looking at  
3 the synthetic/non-synthetic issue.

4 But again, I really don't enjoy  
5 disagreeing with Zea, as you all know. I  
6 think this is a very serious matter and I  
7 don't want to go through the whole history on  
8 it. But we, long ago, EPA had expected that  
9 the NOP and the NOSB would have dispensed with  
10 the use of these lists because EPA has  
11 discontinued the lists. We don't have -- and  
12 they have retained as a static list, they have  
13 retained lists one through -- I guess for us,  
14 lists 3 and 4(a) and (b) as a static list  
15 because EPA no longer uses that process. They  
16 have dispensed with this listing process.

17 So, we have been engaged in a  
18 process that we are going to get a report on  
19 that during this meeting, that is moving at  
20 that glacial whatever speed that is.

21 So, I just think given that it  
22 makes sense that we treat this, and I am happy

1 to do it the way you are suggesting Zea, we  
2 treat this as a synthetic ingredient that is  
3 identified by OMRI as an ingredient that,  
4 whatever you call it, take the word and blurt  
5 out, just call it ingredient, impurity,  
6 contaminant, whatever it is, the Board is  
7 significant enough at a significant enough  
8 level that the Board should evaluate it in  
9 making a determination on listing or making a  
10 determination on whether it should be  
11 evaluated or not, given the synthetic/non-  
12 synthetic determination.

13 CHAIR STONE: Okay. It seems like  
14 we got to a pause in that conversation. Are  
15 you good, Zea?

16 MEMBER SONNABEND: So next, we are  
17 going to have a report from Lisa about the  
18 Inerts Working Group, which Jay and I both sit  
19 on, along with Lisa and Emily Brown-Rosen and  
20 two people from the EPA.

21 DR. BRINES: Thanks, Zea. I think  
22 that is a good transition into this topic. I

1 don't have too many slides here, so we will  
2 try and zip through them.

3 Okay, as Zea mentioned, this is  
4 the membership of the Inerts Working Group.  
5 We have two members from the Board, two  
6 members of NOP staff and then two individuals  
7 from EPA that work specifically on pesticides  
8 and inert issues.

9 So, as just a reminder, the new  
10 Organic Feed Production Act does indicate that  
11 the National List may provide for the use of  
12 inerts and pesticides, specifically when they  
13 are not classified by EPA as inerts of  
14 toxicological concern. And the NOP does have  
15 a definition for inert ingredient in the  
16 regulations at 205(2), which follows from the  
17 definition that EPA uses from FIFRA.

18 And just as a reminder, so inert  
19 ingredient refers to other ingredients that  
20 are in pesticide products. It is not the same  
21 as something that is chemically or  
22 biologically inert. It is used for common

1 language.

2 So, the rule as it currently is  
3 listed, we do allow for the use of List 4  
4 inerts, which are those chemical ingredients  
5 that had been previously classified by EPA as  
6 either 4(a) or 4(b). So, those allowance for  
7 List 4 on both the crop portion of the  
8 National List at 205.601(m) and the livestock  
9 portion at 205.603(e). We also have an  
10 allowance for the List 3 inert ingredients but  
11 only allowed in passive pheromone dispensers  
12 at 205.601(m).

13 Both List 3 and List 4 allowances  
14 are subject to Sunset review. The next coming  
15 Sunset review is October 2014 for List 4. So,  
16 some action will need to be taken before then.

17 Okay so again, the issue is that  
18 EPA had put inerts into these lists according  
19 to their toxicology and use patterns as part  
20 of a reassessment that they were doing. But  
21 they completed that reassessment in 2006 and  
22 they no longer use those or maintain those

1 Lists 1 through 4. But because of the way our  
2 regulations cite them, we are still operating  
3 with those obsolete lists of inerts, which  
4 were last updated in August 2004.

5 Since that time, we have been  
6 receiving and continuing to receive petitions  
7 for the use of inerts that were not captured  
8 on those old lists.

9 And just a brief history. In  
10 April of 2010, we had the first Board  
11 recommendation about inerts which asked NOP to  
12 work with EPA for more review of inerts and  
13 give various options for collaboration, for  
14 review and listing.

15 In October 2010, the NOSB reviewed  
16 the existing listing for List for inerts  
17 because it was up for Sunset. And in December  
18 2010, following that meeting, the Inerts  
19 Working Group was established.

20 In October 2012, the Board issued  
21 a recommendation which proposed a policy to  
22 review all known inert ingredients by groups,

1 with individual inclusion on the National  
2 List, that is individual listings on the  
3 National List. Since that time, the Inerts  
4 Working Group has worked to develop and look  
5 at data on known inerts that are in use and  
6 how to group those for categorical review.

7 We have developed a plan for  
8 public notification and comment. It is a  
9 complicated topic, so we are still continuing  
10 to work through that.

11 In terms of new information that  
12 we didn't report last time, between May 2013  
13 and April 2014 NOP has met with EPA staff at  
14 a different program, which is called Design  
15 for the Environment. That is a newer program  
16 with EPA that does do review of ingredients.  
17 They run a voluntary labeling program for  
18 safer chemical products and they publish a  
19 Safer Chemical Ingredients List or the acronym  
20 is SCIL, S-C-I-L.

21 They also published the detailed  
22 criteria for those ingredients on their

1 website. They do -- the criteria are based  
2 categorically. So, they have got criteria for  
3 surfactants, criteria for pH adjusters,  
4 criteria for key loading agents. So, it is  
5 evaluating substances within a specific use in  
6 determining which are the safer chemicals that  
7 qualify for this list.

8           So, there is a lot of overlap in  
9 the criteria under the DfE, Design for the  
10 Environment program and what qualifies a  
11 chemical for the safer ingredients list. A  
12 lot of overlap with some of the criteria that  
13 was in the Board recommendation. It doesn't  
14 include all of the criteria under OFPA, such  
15 as essentiality but a lot of the toxicology  
16 and other work is covered under some of the  
17 chemicals that have been evaluated for the  
18 SCIL list.

19           The Inerts Working Group has  
20 reviewed some aspects of the DfE program. We  
21 have been exchanging information with EPA on  
22 the program, including some questions that

1 they have responded to. We have some  
2 preliminary data on some inerts that are known  
3 to be in use in products for organic use. We  
4 have shared some of that information with DfE  
5 so that we could compare a list of what we  
6 know is in use versus those chemicals that  
7 have already been reviewed by DfE and  
8 determined to qualify as a safer chemical.

9           So, the current status of this  
10 work is we are consulting with the Office of  
11 General Counsel to see if there is options for  
12 collaboration with EPA, in terms of this safer  
13 chemical program. They have done a lot of  
14 work in grouping chemicals by class in  
15 evaluating those chemicals within the context  
16 of how they are functioning in a product. We  
17 think there is a lot of information that we  
18 can glean from that process that directly ties  
19 in to the intent of the Board recommendation.

20           The inerts working group has  
21 continued meet. Once we get feedback from our  
22 Office of General Counsel, if this option is

1 viable, then next steps would be further  
2 consultation with the Board on details of how  
3 this arrangement might work. So, we are  
4 hoping to have more information to provide at  
5 the fall meeting. If this is something that  
6 we end up pursuing, of course, there will be  
7 public notification and comment to get  
8 information from various stakeholders that  
9 might be affected. But it looks promising, so  
10 we are hopeful that this might be a good  
11 option to pursue to avoid some of the  
12 duplicative work that might already have been  
13 done under this program.

14 Okay, I am happy to answer  
15 questions, if there are any.

16 CHAIR STONE: Questions from the  
17 Board or qualifications? Jay, anything you  
18 want to add?

19 MEMBER FELDMAN: Well, we  
20 appreciate all the work that NOP is doing on  
21 this topic. It is a really important topic.  
22 Obviously, we would like things to move

1 faster. That is always the case. So,  
2 anything we can do to move it along is  
3 helpful. Thank you.

4 CHAIR STONE: Thanks. Okay, we  
5 are on to Sunset 2015.

6 MEMBER SONNABEND: Okay, we're  
7 going to move on to the Sunset 2015 items and  
8 I think in the interest of time, and because  
9 it is posted in the posting, we won't have  
10 Lisa give the very much detail about what each  
11 one is but the point people will summarize it.

12 I will ask my esteemed colleagues  
13 to refrain from making this a soap box about  
14 why you are unhappy with the Sunset changes as  
15 you present each material.

16 CHAIR STONE: The Chair concurs  
17 with that.

18 MEMBER SONNABEND: Let us start in  
19 the order posted with aqueous potassium  
20 silicate, which is Jay.

21 MEMBER FELDMAN: Can I go second?

22 MEMBER SONNABEND: You want to go

1 second, all right.

2 MEMBER FELDMAN: If you don't  
3 mind.

4 MEMBER SONNABEND: I don't mind.  
5 So, the next one is sodium carbonate  
6 peroxyhydrate. My glasses get stuck. And  
7 that one is mine, so hold on a second.

8 Okay. Sodium carbonate  
9 peroxyhydrate was put on the list in 2007 and  
10 so it doesn't have quite as long a history as  
11 the things that were adopted with the original  
12 National List. It's used as an algaecide and  
13 it had technical reports done in 2006 and then  
14 we did request another technical report in  
15 this year.

16 It was originally put on the list  
17 with the annotation that says federal law  
18 restricts the use of this substance in food  
19 crop production to approved food uses  
20 identified on the product label.

21 So, now it is up for Sunset  
22 review. And in keeping with trying to get as

1 much public comment on each item as possible,  
2 you will have noticed some change in this  
3 posting from how it was in the fall meeting.  
4 In the fall meeting, the summary was posted  
5 but not the comments from our Subcommittee on  
6 what particular issues we would like to see  
7 addressed in public comment.

8           So, we were able to formulate on  
9 this and the other Sunset materials specific  
10 questions that we may have had in terms of  
11 that we would like input from the public. For  
12 the sodium carbonate peroxyhydrate, the  
13 question was we were seeking a comparison of  
14 this material to copper sulfate for control of  
15 algal scum in rice production and whether it  
16 could replace copper sulfate for this use.  
17 Unfortunately, we got very little response to  
18 this question, except we did get some from the  
19 petitioner.

20           We did get in the fall of 2013  
21 when we gave no question, we gotten comments  
22 from Beyond Pesticides and nine supporters

1 about removing from the list and one from CCOF  
2 to keep the new items on but feeling that  
3 there should be more information to respond to  
4 in order to present good information back.

5 For this round, we got comments  
6 from the petitioner, Biosafe Systems, Beyond  
7 Pesticides, OMRI, and Cornucopia. And that is  
8 all.

9 And you know what? This isn't the  
10 right thing. Hold on one second.

11 (Pause.)

12 MEMBER SONNABEND: Okay, the key  
13 points raised. The people who were against  
14 this material noted that it would found by the  
15 NOSB in its 2007 recommendation not to meet  
16 the OFPA criteria of essentiality,  
17 compatibility with organic production, and  
18 impacts on human health and the environment.  
19 They pointed out that it is not permitted in  
20 organic production internationally.

21 The TR mentioned several materials  
22 and alternative practices to reduce algae in

1 ponds and rice patties, including rice straw,  
2 barley straw, allelopathic plants, and  
3 herbivorous fish. And they pointed out that  
4 the SCP does not fit into any OFPA categories,  
5 SCP being sodium carbonate peroxyhydrate,  
6 which I might say SCP from now on.

7 The comments in favor of it  
8 included those that it has better control of  
9 algae and its breakdown components of water  
10 and oxygen than copper does and it is needed  
11 as relief from elemental copper accumulation  
12 associated with copper-based compounds.

13 The petitioners input mentioned  
14 that in 2014 copper labels have been  
15 restricted to a label that is rendered useless  
16 when treating algae. Therefore, copper may  
17 not even be an option from now on. I will  
18 have to look into that more because that was  
19 news to me and I did not have a chance to  
20 pursue it.

21 Sodium carbonate peroxyhydrate has  
22 been approved for use in drinking water by the

1 NSF and also has been kosher certified. And  
2 when used in irrigation ponds, sodium  
3 carbonate peroxyhydrate has less corrosion  
4 issues with irrigation equipment than copper  
5 sulfate.

6 Then we got a somewhat neutral  
7 comment from OMRI but talking about the  
8 annotation. The annotation for this material  
9 is confusing and difficult to interpret for  
10 products that are manufactured outside the  
11 U.S. or labeled for other uses than besides a  
12 pesticide or for food crops. The annotation  
13 indicates it is restricted to food crops.  
14 However, if you are using it as an irrigation  
15 cleaner, that wouldn't necessarily have food  
16 crops on the label, so it doesn't really make  
17 that much sense.

18 And I do agree with their concerns  
19 about the annotation whole-heartedly. I'm not  
20 sure I have the energy to do a whole petition  
21 to get the annotation changed at the same  
22 time, but the annotation really is lame on

1 this one. I am just telling you.

2 So, we have further work to do  
3 before we come out with our recommendation.  
4 We have not had a chance to discuss in  
5 subcommittee where we are going with this. It  
6 is very likely that a petition to remove will  
7 come forward and then it will come before the  
8 whole Board, as we feel is proper for a  
9 material that definitely has unresolved  
10 issues.

11 The further work that I have to do  
12 or we, as a subcommittee, include the fact  
13 that I think we got very little grower comment  
14 because SCP spelled out is really a mouthful  
15 and growers have no idea that that is actually  
16 in the product that they may have been using.  
17 And so, unless you name the brand name product  
18 to growers and say what do you think about  
19 this brand name, they are not going to know.  
20 And so, granted, we, even at CCOF, could do a  
21 better job because we send out to the affected  
22 members yes, comment on this but we did not

1 name the brand names in ours.

2           However, we did, now that we can  
3 link into the material use for our growers,  
4 pull up collective data, we have 34 clients  
5 who use materials that this is the main  
6 ingredient. I believe we have five different  
7 compound -- five brand name products with this  
8 as the active ingredient, although by far, the  
9 most use is one of the brand names of those  
10 five.

11           So, we need to take a look at who  
12 those growers are, what they are using it for  
13 and whether there are valid things to  
14 alternatives. We clearly need to look further  
15 at whether these new copper restrictions will  
16 make a difference in the need for this  
17 material and whether it will start being used  
18 more. It only has been registered in rice  
19 since 2010 and probably that registration,  
20 there is a very short window in the spring  
21 when this is needed. And if the registration  
22 came later in the year, then that it wasn't

1 even used in the 2010 growing season. So,  
2 that leaves only three years when it could  
3 have been used so far and we have to look into  
4 whether it has actually been used.

5 So, we do have more work to do but  
6 this one will come back, according to our  
7 Sunset review, in the fall.

8 CHAIR STONE: Any questions for  
9 Zea?

10 The process, so, this is the first  
11 full review. We have asked for public  
12 comment. As Zea mentioned, we got a  
13 smattering on this one but this is the  
14 opportunity for us to fully flesh out any  
15 issues, so that it can be taken back to the  
16 committee so that when it comes back in the  
17 fall, there is no surprises. The Committee  
18 can do its work thoroughly so that the new  
19 process -- people may not like the new process  
20 but this is what we are given and this is how  
21 we are going to make it work. So, this is the  
22 time for us to flesh it out.

1                   Okay. Jean, I'm sorry.

2                   MEMBER RICHARDSON: I would just  
3                   concur with what Zea was saying about the fact  
4                   that, as I read through this material, it  
5                   definitely needs to have a petition to change  
6                   because of the annotation. And so, I would  
7                   assume we would seem -- it would be  
8                   interesting to see further information on that  
9                   as you go through your analysis in  
10                  subcommittee.

11                  MEMBER SONNABEND: The thing is no  
12                  one in the audience or the committee has any  
13                  incentive to put in a petition to change the  
14                  annotation.

15                  MEMBER RICHARDSON: Yes, I know.

16                  MEMBER SONNABEND: So, if we can  
17                  get it done in a timely way -- I mean really,  
18                  it just should be removed, in my opinion.

19                  CHAIR STONE: Melissa?

20                  DR. BAILEY: Yes, thanks. I just  
21                  wanted to remind the Board that under the  
22                  Sunset process, this is the time for those

1 members, who may not be on the Corps  
2 Subcommittee, to voice their perspective to  
3 the Subcommittee, including whether you feel  
4 for the next meeting that they should consider  
5 a proposal to remove. So, just pointing that  
6 out, since this is our first time in the  
7 process.

8 CHAIR STONE: That was what I was  
9 trying to say but I think you said it better.

10 Jean.

11 MEMBER RICHARDSON: So, I am not  
12 on the Crops Subcommittee and I would  
13 certainly be supporting a proposal to -- a  
14 recommendation to remove.

15 CHAIR STONE: Calvin?

16 SECRETARY WALKER: Yes, I would  
17 concur seeing a proposal.

18 CHAIR STONE: Okay. Everybody  
19 good? Okay, thank you much.

20 So, we are going to go -- I'm  
21 sorry. Calvin.

22 SECRETARY WALKER: Jean and I had

1 suggested seeing a proposal for removal. So  
2 what is the outcome? Does that mean that the  
3 Crops Committee --

4 MEMBER SONNABEND: It goes back to  
5 the committee and we will take that up.

6 SECRETARY WALKER: So, it is not a  
7 definite. It is up to you all still to  
8 decide.

9 MEMBER SONNABEND: Like I said, we  
10 will take it up. I imagine that will come  
11 from within the Subcommittee, as well.

12 CHAIR STONE: Melissa.

13 DR. BAILEY: Yes, for both Jean  
14 and Calvin, it may be helpful to the  
15 Subcommittee if you elaborate on your  
16 perspective of why you would like them to  
17 consider removal, just for their own  
18 deliberations.

19 MEMBER RICHARDSON: It would seem  
20 to me looking at it, I would concur with the  
21 comments that were put in by OMRI that the  
22 language in the annotation sort of makes it

1 impossible to really adequately assure that  
2 this material follows U.S. federal law when it  
3 is being used in other places. That would be  
4 one of the issues that would seem to me to be  
5 of considerable concern.

6 CHAIR STONE: So, what I'm also  
7 seeing here is it is not only important for  
8 the community to weigh in when they see this  
9 first notice and we are trying to sort of  
10 advertise that as well, but also for committee  
11 members to take this first -- non-subcommittee  
12 members to take this and be sure that we vet  
13 it, as individuals, to bring back to the  
14 committee, so that this process can work as  
15 well as it can.

16 So, this is our first trial  
17 balloon and I appreciate everybody working  
18 through it. Anything else on this material?

19 Yes, Jay.

20 MEMBER FELDMAN: Well, I don't  
21 know again if this is something that is  
22 feasible in the time frame but I think in

1 order to elicit input from the grower  
2 community along the lines that Zea suggested  
3 if there was a mechanism in place to receive  
4 that information through a docket or something  
5 of that sort.

6 If we don't, the likelihood is  
7 pretty high that new substantive information  
8 will come up at the next meeting that would  
9 force us to postpone. My assumption is that,  
10 though, that if we postpone and don't take  
11 action that it remains on the list. Is that  
12 correct, if we go past the 2015 deadline?

13 MR. McEVOY: Yes, as we presented  
14 yesterday, the process is is that your  
15 responsibility is to complete the review. So,  
16 once the review is complete, then you complete  
17 part of the Sunset process and then the next  
18 step in the process is for the program to  
19 potentially renew that substance if it  
20 continues to meet the criteria.

21 CHAIR STONE: Okay.

22 MEMBER SONNABEND: Okay, we are

1 ready for aqueous potassium silicate.

2 MEMBER FELDMAN: Thank you. Okay,  
3 so I tried to do this one.

4 The summary of uses are here:  
5 insecticide, acaricide and plant disease  
6 control. Currently listed on 601(e) and  
7 601(i) as aqueous potassium silicate, the  
8 silica -- and this is the annotation -- used  
9 in the manufacture of potassium silicate must  
10 be sourced from naturally occurring sand.

11 There is a technical report in  
12 2003 and 2014. Petitions originally, I guess  
13 in 2004 and a supplemental in 2006. Action by  
14 the NOSB, a review and recommendation for  
15 addition to the National List came in November  
16 of 2007 and the proposed rule was published in  
17 2009, added to the National List in 2010, and  
18 the Sunset date is 2015, as we know.

19 So, the Subcommittee had a bunch  
20 of questions that it put out the community and  
21 I hope you have all seen this already but  
22 potassium silicate -- should I go through all

1 this?

2 MEMBER SONNABEND: Don't read the  
3 whole thing.

4 MEMBER FELDMAN: Yes. So, there  
5 were questions about the technical report,  
6 which discussed the impact of silicate on the  
7 availability of micronutrients. In fact, on  
8 plant tissues there is a question of about  
9 foliar application and the different uses  
10 employing mitigation strategies in  
11 consideration of these impacts. How should  
12 the NOSB weigh this impact on the nutritive  
13 value of treated plants? That was one of our  
14 questions.

15 Okay, now the next slide, I  
16 actually will go back to the public comments,  
17 just to finish off the other questions from  
18 the Subcommittee. Can organic management  
19 systems conserve and build available silicon  
20 in the soil in a way that can serve as  
21 alternative to potassium silicate? The 2014  
22 TR suggests that the following alternative

1 practices exist. And this is where we need  
2 grower input.

3 Ideally, what we need is grower  
4 input at this meeting, really, but we have to  
5 figure out a mechanism to get that. The  
6 Subcommittee is interested in comments  
7 concerning non-synthetic materials and  
8 practices being used in the field.

9 So, what we heard -- oops. Oh,  
10 well. I can't get that slide up. I have this  
11 slide here on public comments. Can you move  
12 it back one? Is that possible? Oops. Back  
13 one. Thank you. Thanks, Lisa.

14 So, as you can see, we didn't get  
15 a lot of comments. One grower in CCOF, Beyond  
16 Pesticides, Cornucopia, California Safe  
17 Schools, and five individuals. The comments  
18 we got were APS, which is the acronym for  
19 aqueous potassium silicate, enters the soil  
20 from plant treatment and is indistinguishable  
21 from silicates already present in the ground.  
22 APS is used as a foliar application, not for

1 roots. Management systems can be used to  
2 build the silicon in the soil to improve the  
3 plants' resistance to disease and reducing the  
4 likelihood of needing a pesticide treatment.  
5 However, when an infestation occurs and a  
6 treatment is required, APS should be an  
7 available option for organic farmers.

8 Information is needed on  
9 accumulation of silicon plants. International  
10 standards do not allow APS in crop production  
11 and organic methods of soil conservation make  
12 its use unnecessary.

13 So, obviously, you can see the  
14 grower perspective of being toward the top of  
15 these bullets and the sort of environmental  
16 concerns being raised at the bottom, bottom  
17 three of the bullets.

18 And that is about it. Back to  
19 you, Mac.

20 CHAIR STONE: Questions or  
21 comments from other Board members, other  
22 committee members? Zea.

1                   MEMBER SONNABEND: Yes, again,  
2                   this suffers from the fact that people know it  
3                   by the brand name probably more than they know  
4                   it by the name we know it by. And so, that is  
5                   one reason why we get low grower response.

6                   And granted, this is our first  
7                   time running through the Sunsets this way and  
8                   so even with the two meeting, because the  
9                   canceled meeting, format, there wasn't enough  
10                  time to fully reach out to all the growers to  
11                  get it clear. But from the limited  
12                  conversations I started to have with growers,  
13                  I have actually never seen this being used on  
14                  an inspection. And the growers have indicated  
15                  that it is a highly alkaline material when  
16                  they put it into their tank to mix it. And  
17                  so, therefore, it needs really extensive  
18                  buffering that varies a lot compared to what  
19                  your water situation is. And if you don't  
20                  buffer it just right, it hurts, you see  
21                  phytotoxic damage from the alkalinity on the  
22                  plants.

1                   And so for these reasons, I  
2                   suspect it is not very widely used. And I  
3                   think the fact that the petitioner didn't show  
4                   up also might indicate that they are not  
5                   having -- it is not very widely used.

6                   So, I definitely think this may be  
7                   a candidate for removal from the list because  
8                   we really got so limited input on it and  
9                   because growers don't really talk about it.  
10                  They are not very likely to write in if they  
11                  tried it and it burned their plants because it  
12                  was alkaline. That doesn't mean they want it  
13                  off the list. It means they want everything  
14                  in their toolbox but that wasn't really one of  
15                  the things that was good. So, I just don't  
16                  know how much we will hear about it in the  
17                  future.

18                  But I will try, between now and  
19                  the next meeting, to survey our growers and  
20                  see what we get further.

21                  CHAIR STONE: Jean?

22                  MEMBER RICHARDSON: My questions,

1 I am not on the Crops Subcommittee, so based  
2 on the very limited information that presently  
3 we have in hand, I don't really see that it is  
4 a -- it doesn't appear to have a high level of  
5 essentiality. I am not aware of it when I do  
6 inspections, myself, in the northeast, but  
7 that is a limited area to look in, and  
8 geographically it may well vary in terms of  
9 where it is being applied and used, which  
10 would be important information to have.

11 Absent any good sign of  
12 essentiality, I would be recommending a motion  
13 to delist.

14 CHAIR STONE: Okay.

15 MEMBER FELDMAN: Again, if you  
16 don't mind. You know maybe we should  
17 institute a general meeting of each  
18 subcommittee that has sunsets coming up, so  
19 all Board members can bring or some other  
20 mechanism to bring concerns to the  
21 subcommittee and maybe formalize something  
22 like that.

1 CHAIR STONE: Yes, I think it is  
2 becoming more apparent the value of non-  
3 subcommittee members paying a lot of attention  
4 to these Sunset materials so that this first  
5 meeting can garner the attention that it  
6 needs. And this was an original concern when  
7 this system came up.

8 Yes, I think we need that  
9 mechanism and that is part of what we are  
10 trying to figure out here and I know that we  
11 will.

12 CHAIR STONE: Go ahead Miles.

13 MR. McEVOY: Yes, I think this is  
14 maybe where we start looking at some ideas  
15 that came out of that NOSB assessment, in  
16 terms of maybe a webinar, which could be open  
17 to the public, where the Board could have  
18 these subcommittee discussions that the whole  
19 Board participates in, so that there is a full  
20 discussion of these substances and figure out  
21 how to move forward.

22 So, we will try to look into some

1 other alternative ways to keep an open public  
2 process for the Sunset review process.

3 MEMBER THICKE: Could I add?

4 CHAIR STONE: Francis.

5 MEMBER THICKE: I would like to  
6 add that if we do something like that, that in  
7 some way we need to engage the producers.  
8 Because the average farmer, we are out there.  
9 We are not looking for this kind of  
10 engagement. Unless you grab a hold of us  
11 somehow, we are not going to know.

12 CHAIR STONE: Well, and certifiers  
13 have databases. They are getting more  
14 sophisticated in their databases and the ACAs  
15 can be a big benefit here at the risk of their  
16 time.

17 Zea.

18 MEMBER SONNABEND: Well, actually,  
19 I just wanted to reemphasize that point. If  
20 perhaps Pat or other certifiers in the room,  
21 each time we have a sense that material could  
22 call out to the group for if they know how

1 many of their clients use a material, they  
2 could come up with it. Like they have started  
3 doing for handling, they will often survey how  
4 many of your processors or using this or not.  
5 If they know that information for crops use  
6 materials that are sunsetting, it is  
7 definitely good to know how much the materials  
8 on the list that aren't obvious ones are being  
9 used in the field. And maybe we could get  
10 that information in.

11 CHAIR STONE: Because the  
12 certifiers can use brand names. It's just  
13 that we can't because of our situation.

14 Okay, last one.

15 MEMBER SONNABEND: Last we have  
16 sulfuric acid and that would be Colehour.

17 MEMBER BONDERA: Okay, thank you.  
18 I thought I was going to be the first of the  
19 Sunset ones but now I am the last thing of the  
20 day. So, either way I was going to go pretty  
21 quick, frankly, but we will talk about it as  
22 we need. Thank you, Zea.

1                   Sulfurous acid is coming to  
2                   Sunset. So, it is 205.601(j), just so you  
3                   know.

4                   So, just to make sure that people  
5                   are, to some degree, up to speed, I think I  
6                   personally find this a little bit confusing  
7                   because it has gone from the subcommittee to  
8                   now it is everybody. But what has everybody  
9                   even thought about about it?

10                  So, the listing is sulfurous acid  
11                  is the name given to water that has been  
12                  sprayed through smoke and fumes produced by  
13                  burning elemental sulfur. And the primary  
14                  purpose of sulfurous acid is reducing the pH  
15                  of irrigation water to alleviate the effects  
16                  of specific saline or sodic soil conditions or  
17                  the effects caused by saline or sodic  
18                  irrigation. Otherwise stated, acidified  
19                  irrigation water used to adjust soil pH into  
20                  the acidic range.

21                  And you know we have had some live  
22                  testimony anyway, so I don't think you know

1 nothing about it. But a little bit more  
2 history is that elemental sulfur was once  
3 mined from salt domes but now residual sulfur  
4 is removed from petroleum, natural gas, and  
5 coal by the quote unquote Claus process, which  
6 is the most significant gas desulfurizing  
7 process recovering elemental sulfur from  
8 gaseous hydrogen sulfide. And it was patented  
9 first in 1883 by a scientist Carl Friedrich  
10 Claus. So, just so you have that.

11 So, we determined that the TR,  
12 which I think I have the date here -- sorry,  
13 I thought it was going to be mentioned but  
14 this is fine -- 2010 TR. We pursued an  
15 updated TR, so we got one in 2013 but asked  
16 some follow-up questions, so it was finalized  
17 a few months ago, early 2014.

18 And I think it is in the packet of  
19 information. I don't know how much people  
20 have looked at it but I don't have a slide but  
21 I tried to summarize the fact that in  
22 preparation for the meeting, we determined

1 that there were still some question areas that  
2 we wanted more input from the public on that  
3 were put forth.

4 And my summary is that the first  
5 question is if or how the sulfurous acid  
6 transforms to sulfate and the crop  
7 availability, along with how farmers or  
8 certifiers can determine such soil conditions  
9 that would result in that process.

10 And the second question that was  
11 put forth was regarding the use of sulfurous  
12 acid to remedy unsustainable agricultural  
13 practices and the implications thereof of a  
14 Sunset review process and specifically impact  
15 on soil life as notable.

16 So, I am about to even wrap it up  
17 here. I think it is worth noting, again,  
18 historically, that sulfurous acid is not  
19 permitted in other countries' organic systems.

20 From my perspective at least,  
21 looking at the whole picture, we did get  
22 comment because this was going to be done at

1 the last meeting. So, if you looked through  
2 the public testimony -- the written testimony,  
3 we did get comment. And we got -- I don't  
4 think it is ridiculously substantial but we  
5 got comment for both meetings we did, both the  
6 canceled meeting and this meeting.

7 I would say sorry my thing  
8 disappeared on me. Sorry.

9 Overall, my general observation is  
10 that the comments, and we can divide them into  
11 categories, but the testimony was both to  
12 delist and to relist on both sides, if you  
13 want to view it that way. I think that  
14 numerically, there were more, the votes were  
15 more for not renewing the listing, again,  
16 depending on how one wants to look at that.

17 Several farmers, processor, and  
18 the certifier, CCOF, encouraged that sulfurous  
19 acids remain on the list. From written  
20 testimony and from some of those same people  
21 you heard live testimony today in that regard,  
22 that there aren't viable alternatives and that

1 the needs are at hand for its use. I think,  
2 you know I am not going to quote who or what  
3 all those things were but I think it is worth  
4 noting that -- and I did say this to the  
5 subcommittee but for me, for whatever reason  
6 it stands out, that some kinds of limitations  
7 of allowing use only if the pH is verified  
8 above seven and/or a statement that it is not  
9 permitted in water-logged soils was included  
10 in some of that testimony.

11 I think all of the public interest  
12 groups that testified representing their  
13 members and all of the consumers, and it  
14 wasn't a small percentage of the total  
15 testimony that submitted written testimony,  
16 requested that NOSB delist sulfurous acid, in  
17 terms of protecting our soils, the broader  
18 environment, and looking at the situational  
19 need. I think, at this point in time, that is  
20 really a general overview and I am not certain  
21 how.

22 If people have comments or

1 questions, I am happy to do it. Several  
2 people who work with Driscols submitted  
3 written testimony that we all saw. Like I  
4 said, I'm not going to cite all the different  
5 ones. But that is all I wanted to go through.

6 CHAIR STONE: Jean?

7 MEMBER RICHARDSON: Yes, for me,  
8 not on the Crops Subcommittee, having read the  
9 public comment and listened to the comment  
10 today, and noting that elemental sulfur, which  
11 it has to meet those characteristics,  
12 elemental sulfur, at (j)(2) of what is it 605  
13 -- I mean 205.601, it would seem to me that  
14 the way in which it is being utilized is  
15 appropriate.

16 So, on this one, I would not be  
17 suggesting a motion to delist but in fact to  
18 keep this one in use, based on the limited  
19 range, perhaps, but certainly essentiality and  
20 its range of limited use in application.

21 CHAIR STONE: Zea.

22 MEMBER SONNABEND: Colehour failed

1 to totally mention this, but all of the  
2 growers who commented that they use this did  
3 indicate that it improved their soil and  
4 contributed in a positive way to their soil  
5 situation that they started with and that the  
6 sulfate did not contribute any fertilizer  
7 value as a plant nutrient, which is in  
8 directly answering the questions that we  
9 posed, which was very nice that we posed  
10 questions and they addressed them.

11 CHAIR STONE: Francis.

12 MEMBER THICKE: Yes, I have got to  
13 say from what I heard from the growers, I was  
14 pretty impressed with how it worked. And we  
15 have got to remember, this is for use in the  
16 desert. If you are farming in a desert  
17 irrigating, this is not a natural system. And  
18 so, we are going to -- it seems like this is  
19 pretty -- I was pretty impressed that  
20 something like this works better than  
21 elemental sulfur, which actually puts sulfur  
22 in the ground.

1                   So, I would be hard-pressed to  
2                   vote against this thing.

3                   CHAIR STONE: Harold?

4                   MEMBER AUSTIN: I think, too,  
5                   along with the other materials that we were  
6                   just talking about on the 2015, coming from  
7                   that desert area and being well adverse in  
8                   this particular process, I think also trying  
9                   to ferret back out from some of the other  
10                  growers, they are going to think about it as  
11                  a sulfur burner, the sulfurous acid. Probably  
12                  90 percent of those growers aren't even going  
13                  to -- this is not going to be registering with  
14                  them. They are going to be talking about  
15                  their sulfur burners that are burning 99.9  
16                  percent pure elemental sulfur.

17                  So, we probably need to find a way  
18                  to garner that information, maybe is for the  
19                  certifiers or somebody else as well. This  
20                  will be one of the things I think, as we go  
21                  through this process, we are going to need to  
22                  try to figure out how do we ferret that

1 information out and get the word out to the  
2 appropriate stakeholders, so that they are  
3 aware of it.

4 CHAIR STONE: Miles.

5 MR. McEVOY: Yes, I just wanted to  
6 point out that this is an area that -- an  
7 international arena. This is sort of similar  
8 to the biodegradable mulch situation, where  
9 all the other international standards have a  
10 positive list of things that can be used but  
11 they have a different way of looking at what  
12 is allowed and what is not allowed.

13 So, if you look at the EU  
14 regulation, in particular, you will see that  
15 biodegradable mulch is not on the list of  
16 allowed substances. However, it is allowed  
17 and used under the European certification  
18 system. And this is a similar situation with  
19 sulfuric acid. Even though it is not  
20 specifically listed as an allowed substance  
21 under these international regulations, I think  
22 there needs to be some additional looking into

1 that to see whether or not they consider it  
2 something that has to be reviewed because it  
3 used to treat the water before application.  
4 And there is water treatment that occurs that  
5 may not be subject to their particular  
6 regulations.

7 We have a meeting with our  
8 European colleagues on Monday. We have the  
9 European organic working group and this is  
10 something that we will bring up and we will  
11 report back to the Board about how they look  
12 at this particular compound so that can be  
13 clarified.

14 CHAIR STONE: Colehour.

15 MEMBER BONDERA: Thank you, Miles,  
16 for that comment. I think that that is very  
17 useful but it is just in the moment my first  
18 reaction is shouldn't that be something that  
19 would be included in the TR. Shouldn't those  
20 people, a neutral party, be looking at ways to  
21 find out that kind of information or do we  
22 need to rephrase or make sure that kind of

1 questioning is put forth in the TR questions?  
2 Because that is hard for, I think, us to know  
3 how to do or to do appropriately.

4 I think your point is well taken,  
5 though.

6 CHAIR STONE: Okay, anything else?  
7 So, the Committee heard some comments from the  
8 Board, as well as public testimony.

9 Zea are you good for now as far as  
10 the Committee?

11 MEMBER SONNABEND: Yes, I think  
12 that wraps up.

13 Just for the benefit of the  
14 public, though, I do want to say that because  
15 we did not start any voting today, we did not  
16 have the opportunity to make a conflict of  
17 interest declaration, which I am very  
18 interested I making before we start voting.  
19 And so I will do that before we start doing.

20 CHAIR STONE: Yes, Miles and I  
21 talked about that when we started  
22 deliberations and knowing that no one had

1 declared a conflict of interest, anyone on the  
2 Board on any of the materials or any of the  
3 subjects. We didn't go through that today but  
4 certainly we will clarify that and welcome you  
5 all to be comfortable with that when we start  
6 voting.

7 So, any subcommittee chairs, if  
8 you feel the need or something, then we can do  
9 that.

10 So, I guess I want to make sure we  
11 wrap this up, what we learned today. So,  
12 reaching out to the stakeholders, as Harold  
13 likes to call it. The different materials are  
14 going to have different stakeholders that use  
15 different names, that use different materials,  
16 that are in different regions and those types  
17 of things. So, it is incumbent on us to reach  
18 out so that we can do a good job and fulfill  
19 our obligation in reviewing these sunset  
20 materials in the timely manner that we have to  
21 work with.

22 So, any other final thoughts on

1 this kind of first shot across the bow on the  
2 sunset process?

3 Okay, I will remind everyone the  
4 reception, you go out the front door of the  
5 hotel to the right, down two blocks, take a  
6 left and you will find it at 110 Broadway and  
7 Houston Street.

8 We will reconvene tomorrow  
9 morning at 8:30. Thank you very much.

10 (Whereupon, at 6:06 p.m., the  
11 foregoing meeting was adjourned to  
12 reconvene at 8:30 a.m. on  
13 Thursday, May 1, 2014.)  
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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board

Before: Department of Agriculture

Date: 04-30-2014

Place: San Antonio, Texas

was duly recorded and accurately transcribed under  
my direction; further, that said transcript is a  
true and accurate record of the proceedings.



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Court Reporter

**NEAL R. GROSS**

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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)

+ + + + +

THURSDAY  
MAY 1, 2014

+ + + + +

The National Organic Standards Board convened at 8:31 a.m. at the Saint Anthony Hotel, 300 East Travis Street, San Antonio, Texas, Mac Stone, Chairperson, presiding.

MEMBERS PRESENT

MAC STONE, Chairperson  
JOHN FOSTER, Vice Chairperson  
CALVIN WALKER, NOSB Secretary  
HAROLD AUSTIN  
CARMELA BECK  
COLEHOUR BONDERA  
JOSEPH DICKSON  
TRACY FAVRE  
JAY FELDMAN  
WENDY FULWIDER  
NICHOLAS MARAVELL  
JEAN RICHARDSON  
ZEA SONNABEND  
JENNIFER TAYLOR  
FRANCIS THICKE

STAFF PRESENT

MILES McEVOY, Deputy Administrator, National  
Organic Program

MICHELLE ARSENAULT, Advisory Board  
Specialist

MELISSA BAILEY, Director, Standards  
Division, National Organic Program

LISA BRINES, Standards Division, National  
Organic Program

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

8:31 a.m.

CHAIR STONE: If I could ask everyone to start taking their seats. Board members make their way to the table, please. We have a very long day ahead of us today. We've -- each committee is going to go through their agendas. We want to have plenty of time for the Board discussion. We have a couple of kind of generic housekeeping chores here first thing this morning. And I better get my agenda out.

I know that Ms. Favre is ready. We're going to start off with livestock which we kind of referred to.

You may have noticed that we -- when we took back up the aquaculture this semester or term we combined the plant aquaculture materials and the livestock aquaculture materials just so that we could have a unified approach and a shared conversation because of the interaction

1 between them. And I really appreciate the  
2 work the committee did to really roll up your  
3 sleeves and work hard. And I'll let Tracy get  
4 into a little more of the details of that. So  
5 it was kind of a hybrid committee if you will  
6 and they did a lot of great work and we're  
7 going to learn a lot more about it here in a  
8 few minutes.

9           Going to start. Miles is going to  
10 -- I neglected to clarify the conflict of  
11 interest or lack thereof on the discussions  
12 for this meeting yesterday before Zea started  
13 the Crops Committee.

14           So Miles, if you'll at this time  
15 refresh our memory and Michelle has the tally  
16 that the Board has already weighed in on this.  
17 Miles?

18           MR. MCEVOY: Good morning. Can  
19 everybody hear me okay? Okay, good.

20           First of all, I just wanted to say  
21 a little bit about the public comments. Not  
22 very many people here today so I might repeat

1 this later on in the meeting. But I just  
2 wanted to thank everybody for their public  
3 comments over the last couple of days.

4 The Board received a lot of great  
5 information and perspectives about their  
6 proposals. The Agricultural Marketing Service  
7 also heard many concerns about the revised  
8 sunset process as well as concerns about USDA  
9 taking away authority from the Independent  
10 National Organic Standards Board.

11 We really appreciate all the time  
12 and effort that everyone put into providing  
13 these comments. It's really important to us  
14 and it's important to the Board.

15 My goal is to support the success  
16 of the organic community in all of its  
17 diversity. You are a very diverse and a very  
18 passionate group.

19 I am lucky to be able to serve and  
20 I am working to support all of you and your  
21 amazing diversity of perspectives. I would  
22 encourage all of you to reach out to me and

1 the National Organic Program.

2 Please come up and talk with us  
3 during the breaks, invite us to your farms or  
4 organizations so that we can understand your  
5 concerns. Stop in and visit with us when you  
6 are in D.C. and also send us your comments.  
7 You can always do that at [nopguidance@usda.gov](mailto:nopguidance@usda.gov)  
8 and any allegations of violations you can send  
9 to [nopcompliance@usda.gov](mailto:nopcompliance@usda.gov).

10 We're not always going to agree  
11 but we're not your enemy. We're here to try  
12 to serve the best interest of the organic  
13 community as a whole.

14 Okay. Moving onto conflict of  
15 interest. The members of the Board were  
16 appointed to the Board to represent the  
17 interests of particular groups.

18 As such, many of the interests  
19 that you hold, the Board members hold, are  
20 acceptable interests. An interest is  
21 acceptable if you carry it on on behalf of a  
22 represented group and if you receive no

1 disproportionate benefit from expressing that  
2 interest.

3 Interests create appearance  
4 problems, often referred to as conflicts of  
5 interest when an interest directly and  
6 disproportionately benefits you or a person  
7 associated with you that could impair your  
8 objectivity in representing your group, or has  
9 the potential to create an unfair competitive  
10 advantage.

11 Conflict of interest is as much  
12 about the appearance of a personal conflict  
13 and loss of impartiality as it is about direct  
14 financial gain.

15 So Board members are appointed  
16 because they have interests. They represent  
17 those interests. That's a very important part  
18 of the structure of the National Organic  
19 Standards Board is that they have interests  
20 and those interests are important to represent  
21 so there's a full diversity of interests that  
22 are represented in the recommendations that

1       come from the Board.

2                       So over the last month the  
3       National Organic Program provided the members  
4       of the Board with a matrix that lists the  
5       documents that are being voted on at this  
6       meeting.

7                       The Board members were asked to  
8       identify any conflicts of interest on any  
9       agenda item. The completed matrix did not  
10      identify any conflicts with any of the agenda  
11      items by any of the Board members. Therefore  
12      there will be no recusals on any of the items  
13      at this meeting.

14                      At the beginning of each  
15      subcommittee session, at the beginning of this  
16      subcommittee session for livestock no Board  
17      members have a conflict of interest with an of  
18      these subcommittee items.

19                      At this point I'll turn it over to  
20      Mac. And that's it. Thanks.

21                      CHAIR STONE: Okay, thanks, Miles.  
22      So at the beginning of each subcommittee

1       deliberation we had this conversation in  
2       executive committee and maybe hopefully we did  
3       at each subcommittee that the USDA has their  
4       official conflict of interest policy.

5                       We as 15 individuals look each  
6       other in the eye and recognize and revel in  
7       those differences, in those interests as Miles  
8       said that we have. So we as a Board, as  
9       individuals on the Board have sort of  
10      recognized where each of us is in that.

11                      And I personally like, if there  
12      were any stronger declaration of interest,  
13      John, that it be involved in the discussion  
14      phase, acknowledged in discussion, not just in  
15      voting. And I'm not aware of anyone that  
16      feels that they need to declare any abnormal  
17      interests. But to be aware.

18                      So each of us as individuals. I  
19      certainly welcome you to state an interest,  
20      declaration of interest, or lack thereof at  
21      the beginning of each of these subcommittees  
22      as we go in. So, feel free to do that.

1                   And I will remind each of the  
2 subcommittees as we begin each of the  
3 sessions. Zea?

4                   MEMBER SONNABEND: I would like to  
5 make a declaration of interest. And I don't  
6 want to do it at each subcommittee. I just  
7 want to do it once. So may I proceed?

8                   CHAIR STONE: Yes, ma'am.

9                   MEMBER SONNABEND: Okay. Because  
10 I feel personally and beyond the NOP policy  
11 that it is worth it for us to declare our  
12 interest to the public or lack thereof.

13                   And so therefore I would like to  
14 say that I do work for a certifier who may or  
15 may not certify any of the products that come  
16 before us. But I do not stand to gain for any  
17 of those approvals or not approvals.

18                   And I am a partner in a small farm  
19 who grows apples and may or may not use any of  
20 the products that are on the list once they  
21 are approved. Thank you.

22                   CHAIR STONE: Thank you, Zea. Any

1 other thoughts or comments, declarations if  
2 you will? Great, thank you. But please feel  
3 comfortable if you feel it coming on, let us  
4 know.

5 Okay, we're going to start this  
6 morning with the Livestock Subcommittee.  
7 We've got that scheduled until lunch. We  
8 don't want to be in any rush. I'll let Tracy  
9 introduce how we're going to proceed.

10 Then we've got CACS immediately  
11 after lunch, Handling the middle of the  
12 afternoon and we'll round out the day with the  
13 Materials Subcommittee.

14 So, Tracy, with no further ado  
15 I'll let you open the conversation.

16 MEMBER FAVRE: Thank you, Mac. To  
17 start off the conversation this morning I'd  
18 like to first acknowledge and thank the  
19 subcommittee for their work on all the  
20 materials. As you see on the agenda we have  
21 had a boatload of materials and petitions that  
22 we've been responsible for reviewing.

1                   It's been a pleasure to work with  
2                   this subcommittee. We haven't always agreed  
3                   on some of the materials during our  
4                   discussions but it's always been very  
5                   respectful. And hopefully we've created an  
6                   environment where everybody gets to voice  
7                   their opinion and feels as though their  
8                   position has been heard.

9                   We'll start with some materials  
10                  that are not aquaculture but aquaculture is  
11                  the 3,000-pound gorilla sitting in the room  
12                  today. So I do at least want to acknowledge  
13                  that we did approach these materials with a  
14                  systems approach.

15                  We had several discussions as a  
16                  subcommittee even prior to review,  
17                  particularly when the materials came over from  
18                  Crops about how we wanted to philosophically  
19                  approach the review of these materials.

20                  We all did have concerns and  
21                  reservations about the fact that there were  
22                  not yet standards out for us to review within,

1 but were encouraged to also review the draft  
2 standards that had been submitted from  
3 previous NOSB and use that as the framework  
4 under which we reviewed the materials.

5 Like I said we did all have some  
6 reservations and as early as December of last  
7 year did feel as though that there was a  
8 chance that we would move these materials  
9 forward, do the work and the review and if the  
10 standards were not ready we may elect as a  
11 subcommittee to either bring them to the table  
12 for discussion but not vote on them, or not  
13 bring them to the full Board.

14 As is obvious from the agenda  
15 today we did bring the materials together and  
16 forward for the full Board to discuss. I  
17 personally and I think the rest of the  
18 subcommittee felt because there is so much  
19 controversy and this is such a complex issue  
20 that we wanted to have an opportunity for the  
21 full Board to discuss in public these  
22 materials and have everybody weigh in and have

1 a healthy and lively debate on them not only  
2 for the record but also for the benefit of our  
3 stakeholders who want to see that there is  
4 earnest and well-intentioned work being done  
5 on the materials.

6 It is our intention, so everybody  
7 knows here today, to have that presentation of  
8 each of the materials and a discussion. But  
9 we do intend to defer the vote until Friday,  
10 tomorrow, at which time we do intend likely  
11 unless there is a very, very strong reason  
12 otherwise to refer them back to committee  
13 after having considered the written and the  
14 public testimony that we've heard over the  
15 last few days.

16 So having said all that and gotten  
17 the ball rolling we do have our first proposal  
18 petition material, methionine in organic  
19 poultry feed. And Mac is the lead on that.  
20 Lisa, I think you need to make your  
21 introduction.

22 DR. BRINES: Thanks, Tracy. The

1 petition for methionine was received on April  
2 8, 2011, and it was submitted by the  
3 methionine task force. The petition requests  
4 an amendment to the current listing for  
5 methionine on Section 205.603 of the National  
6 List. And I'll go ahead and read the full  
7 current listing for the record.

8 It's under 205.603 Synthetic  
9 Substances Allowed for Use in Organic  
10 Livestock Production, paragraph D as Feed  
11 Additives, number 1, DL-Methionine, DL-  
12 Methionine hydroxy analog, and DL-Methionine  
13 hydroxy analog calcium (CAS numbers 59-51-8,  
14 583-91-5, 4857-44-7, and 922-50-9) for use  
15 only in organic poultry production at the  
16 following maximum levels of synthetic  
17 methionine per 10 of feed.

18 Laying in broiler chickens - 2  
19 pounds, turkey and all other poultry - 3  
20 pounds.

21 The current sunset date for this  
22 listing is October 2, 2017. The most recent

1 technical report for methionine was completed  
2 in 2011 and previous reports are also posted  
3 on the NOP website. Thanks.

4 MEMBER FAVRE: Go ahead, Mac.

5 CHAIR STONE: Thank you, Tracy,  
6 Lisa. So, I've got the recommendation before  
7 me. I'm glad to if any of the committee  
8 members would like me to review the history of  
9 the cascading of recommendations.

10 It's been discuss ad nauseam over  
11 the years since the beginning and before there  
12 was a rule. I'm glad to run through that but  
13 I think everyone's pretty well aware of the  
14 history.

15 There's the intent from the  
16 beginning that synthetic amino acid in poultry  
17 has just been, excuse the pun, Madam Chair,  
18 stuck in the craw of this whole group.

19 And we heard testimony yesterday  
20 that there has been a lot of work, a lot of  
21 money has gone into finding alternatives for  
22 this synthetic product and they've not come up

1 with one.

2 I raise broilers and layers on  
3 pasture. I exceed the European Union 43  
4 square foot per bird most of the time, maybe  
5 not on broilers.

6 But I would suggest that access to  
7 outdoors which is referenced in public comment  
8 a lot, when I move my birds the broilers move  
9 twice a day every day. The layers move every  
10 three or four days on pasture.

11 Whatever insects are there are  
12 gone within minutes of them finding their new  
13 enclosure and that alone does not meet the  
14 methionine needs of the birds, but it does  
15 help.

16 So, I just make reference that it  
17 is -- this is the step-down that the previous  
18 Board has implemented to get the 2 pounds for  
19 broilers and layers, 3 pounds for turkeys and  
20 other fowl.

21 Some describe it as arbitrary.  
22 Others say, well, it has to be forceful to try

1 to encourage these alternatives to be  
2 generated and found.

3 I know that at the University of  
4 Kentucky near where I am they've got a multi-  
5 year trial. They're using different feeds and  
6 cafeteria style feeding, different genetics to  
7 see about this. So there's a lot of work  
8 going into finding these alternatives.

9 But frankly we heard and seemingly  
10 the commercial availability of those is just  
11 not there yet.

12 So, the proposal to allow these 2  
13 pounds or 3 pounds to be a variable rate in  
14 the feed to meet the stage of maturity demand  
15 of the chickens became aware to the committee  
16 as an animal welfare issue because of what we  
17 heard in testimony yesterday and other  
18 documentation that the committee has received.

19 When the growers went to these  
20 step-down rates they could witness and  
21 document behavioral changes, physical changes,  
22 lack of feathering. Chickens can be very

1 cannibalistic by nature and that just doesn't  
2 seem right for us as -- for me as an organic  
3 farmer to allow those things to happen when we  
4 know what can fix it.

5           So just kind of reviewing comments  
6 yesterday. Ernie from the Feed Mill was  
7 talking about variations and if they don't eat  
8 enough total feed then they don't get enough  
9 methionine based on location in the country.  
10 And summertime is different than wintertime.

11           The broiler boys that were here  
12 yesterday, I talked to them. The synthetic  
13 portion of the methionine is somewhere between  
14 one-fifth to one quarter of the total  
15 methionine needs to the bird. So most of it  
16 is still coming from the natural ingredients  
17 in the feed products.

18           Certifiers, I think Jackie from  
19 MOSES talked about that it's important. And  
20 the certifiers will work with the growers and  
21 develop a system of tracking and monitoring to  
22 make this variable rate workable and

1       verifiable at the individual level.

2                       So, all that being said the  
3       recommendation is to allow both broilers --  
4       well, all poultry to use a variable rate of  
5       methionine to meet the nutritional demand of  
6       the birds but still not exceed the overall  
7       total pounds of methionine that go into an  
8       individual animal over the life of that bird

9                       I've got other comments but I  
10       think that sort of frames the conversation.

11                      MEMBER FAVRE:   Okay, thanks, Mac.  
12       I'm going to open it up for any discussion  
13       with the rest of the Board.

14                      CHAIR STONE:   Yes, so it's a  
15       little awkward since I'm the lead but we had  
16       decided that I will sort of direct the  
17       conversation so that the subcommittee chair  
18       can manage on the details of the conversation.  
19       So, Nick?

20                      MEMBER MARAVELL:   Well, in the  
21       interest of full disclosure like Mac I raise  
22       broilers and layers.   And I intend to support

1 this proposal because it gives additional  
2 flexibility to poultry growers.

3           However, I'd like to state in my  
4 reservations in doing so. I feel that we have  
5 used both methionine and no-methionine in our  
6 mineral mix, particularly in the wintertime  
7 when insect activity is lower methionine would  
8 seem to be more advisable.

9           We also mix in alfalfa with our  
10 feed which means we have to change our feed  
11 ration to accommodate the addition of a higher  
12 protein and a lower energy source.

13           But those things are all -- that's  
14 not rocket science. I'm not a nutritionist  
15 but the nutritionists can figure that out. We  
16 also grow alfalfa so it's economically  
17 feasible for us to do so.

18           And what I would like to comment  
19 here is that there's a fine balance between  
20 economic viability making organics available  
21 in the marketplace and staying away from  
22 synthetics.

1                   And so my reservation here is I am  
2                   not able, I mean this methionine issue has  
3                   been debated for a very long time. I'm not  
4                   able to ascertain from the public or from  
5                   within my own limited capacity a way to  
6                   provide an incentive for everyone to come  
7                   together on this and still make the product  
8                   economically viable.

9                   Because I think in the end this is  
10                  an economic issue. And as a Board member my  
11                  statutory charge does not include economic  
12                  considerations. So, it is a little bit  
13                  difficult for me to move forward in this mode.  
14                  So I just wanted to express that.

15                  And that I do think, and this is  
16                  just an opinion, and I've got no basis for  
17                  this, but I do think that eventually if there  
18                  is continued demand from within the organic  
19                  community to move away from methionine,  
20                  synthetic methionine, we will find better ways  
21                  to do it.

22                  And I don't think there's going to

1 be one answer in one section of the country.  
2 I mean it's going to vary from place to place  
3 and from type of operation to type of  
4 operation.

5 But I guess my only reservation  
6 about voting for this is the we give in and  
7 don't continue to explore and innovate. And  
8 I know that the task force is going to  
9 continue on.

10 We do need to keep the pressure on  
11 and that's about the only thing I can say.  
12 And we need to do it in a moderated way.

13 So, while I support this and I  
14 believe this is an improvement over our  
15 existing policy for poultry producers, there's  
16 no question about that, I'm all for adding the  
17 flexibility. I just don't want us to lose  
18 sight of the final goal. So, thank you.

19 CHAIR STONE: Zea?

20 MEMBER SONNABEND: Thank you, Mac.  
21 I have two questions. So, if you -- I'll do  
22 them both together or else one at a time.

1 Well, this is a material that  
2 sitting in the audience for 20 years I often  
3 turn to the person next to me and said boy,  
4 I'm glad I don't have to vote on it.

5 (Laughter)

6 MEMBER SONNABEND: Because it is  
7 really one of the more tougher complicated  
8 things that we have to do.

9 But being that I'm not on the  
10 Livestock Committee and I went back and read  
11 the document yesterday and reread the  
12 recommendation yesterday, but I have not read  
13 all the TRs recently or anything like that.  
14 So this may be in there and I just don't know.

15 My first question is has  
16 relatively more or less methionine in the  
17 chicken affected anyone's health, any humans  
18 that eat the eggs or the meat from that  
19 chicken? Like do they get methionine  
20 deficient? Do people get methionine  
21 deficient? Or has there been any health  
22 effects from too much methionine in a chicken?

1 CHAIR STONE: It's been a little  
2 while since I read the TR but I don't remember  
3 thinking anything about that aspect.

4 I did have in my notes and did  
5 mention that as I sell chickens one at a time  
6 at the farmer's market and engage customers  
7 they have no idea what methionine is and  
8 that's not anywhere on the radar of their  
9 concern. And I'll be glad to check that. But  
10 I don't remember anything of pass through the  
11 chicken and affecting the human.

12 MEMBER SONNABEND: I figured  
13 someone might have commented on that if it was  
14 the case.

15 So my second question, and granted  
16 I probably should know this, but I couldn't  
17 figure it out from reading this again  
18 yesterday. If we vote this in does that start  
19 5 years ago again for sunset on this? Or if  
20 not, what's the previous sunset schedule that  
21 we're voting something in for how many years?

22 CHAIR STONE: It does reset the

1 sunset clock because it's a change in it. I  
2 think Lisa said it's currently set to sunset  
3 in 17.

4 MEMBER SONNABEND: I would like  
5 that to be more specific if not in the  
6 document itself at least in the cover sheet  
7 once it's voted for. Because that was just  
8 not at all clear to me.

9 CHAIR STONE: Melissa, you want to  
10 clarify?

11 DR. BAILEY: Yes, thanks. Just to  
12 be clear, the Board if they voted and make a  
13 final recommendation to change the annotation  
14 that would come to USDA, we'd review that  
15 recommendation and determine whether we were  
16 going to pursue rulemaking.

17 If we did pursue rulemaking the  
18 sunset date for this material would only  
19 change upon issuance of a final rule on that  
20 effective date. So, it's hard to say actually  
21 what that target would be because we have to  
22 do our own review of what you provide and then

1 it would have to go through that process.

2 MEMBER SONNABEND: But it would be  
3 five years from whenever the final rule is  
4 published for this particular annotation.

5 DR. BAILEY: Correct.

6 CHAIR STONE: Jay?

7 MEMBER FELDMAN: I appreciate  
8 hearing all the comments, particularly Nick's  
9 comments about keeping the pressure on.

10 As you know, I'm concerned that  
11 we're taking the pressure off. I'm less  
12 concerned about transition. I mean, I always  
13 thought the statute and the regulations  
14 facilitated transitions and didn't create  
15 abrupt changes by virtue of the debate that's  
16 usually preceded action by several years and  
17 then action that has resulted in rulemaking,  
18 that extends the time frame.

19 And then the flexibility of the  
20 Board over the years to keep the pressure on  
21 by use of expiration annotations from time to  
22 time such as with antibiotics.

1                   With -- when I first started  
2                   debating this, and yes, it's not my favorite  
3                   thing to do, the sunset process has changed.  
4                   You all know that. And it's changed in ways  
5                   that takes the pressure off.

6                   So, with respect to the comments  
7                   we previously heard about the desire of one  
8                   member to keep the pressure on I don't think  
9                   anything in this motion would do that. In  
10                  fact, I think it would do just the opposite.  
11                  And I'd appreciate hearing comments on that  
12                  point from Nick especially.

13                  This is probably a good example,  
14                  Mr. Chair, of a place where this Board would  
15                  want to keep the pressure on. We already  
16                  heard from one of those who gave us a  
17                  statement that what the Board had done  
18                  previously did help to move the industry to  
19                  make changes. I mean, that's music to my  
20                  ears. That's what this Board is about,  
21                  continuous improvement.

22                  But to put this into the new

1 sunset process is basically to say that we  
2 won't see -- the likelihood of change goes  
3 down, the pressure goes down, the effect of  
4 this Board's desire or some members to effect  
5 more changes and transition. That pressure  
6 goes down.

7 So I would propose when we get to  
8 that point in the program that we consider an  
9 expiration date on this petition. I don't  
10 know if the program would consider that  
11 substantial new information or new -- but I  
12 think we really need to seriously consider  
13 whether this is one of those examples where we  
14 want to create incentives for the industry to  
15 move even further.

16 This decision will affect research  
17 dollars, it will affect investment of private  
18 -- private investment of research and  
19 development.

20 The message that comes out of this  
21 vote will either mean we stay on the  
22 treadmill, this dependency treadmill, or we

1 create investments out there in the private  
2 sector and even in government research to make  
3 this transition.

4 So think about that when you think  
5 about whether you can support the motion as  
6 has been proposed by the subcommittee. And  
7 think about -- I hope you'll think about  
8 whether we can do something as a Board that  
9 provides more incentives for the kinds of  
10 investments we'd want to see.

11 And by the way, just to give you a  
12 parallel, if you go back and talk to  
13 researchers on alternatives to antibiotics I  
14 don't think anyone would disagree that the  
15 vote that this Board took in Seattle in what  
16 was that, 2011 or 10 -- I forget -- did  
17 create research dollars, literally. It  
18 created the awareness in the research  
19 community that we better get looking at this.

20 So that message that this Board  
21 sends out is critically important. And your  
22 role in helping to not just rhetorically state

1 that desire but take an action that puts it --  
2 makes it happen is what we're about I think.  
3 Thanks.

4 CHAIR STONE: Colehour.

5 MEMBER BONDERA: Thank you. Yes,  
6 I guess -- I have three different points I  
7 want to make and I'm not sure they're all  
8 questions. But I do want to say the first one  
9 really is -- I guess it's sort of related to  
10 what Jay just said.

11 Which is, even though it's not  
12 directly which -- my understanding since I've  
13 been on the NOSB and since I've listened to  
14 what we've talked about really is we as a body  
15 are supposed to be respecting past NOSB  
16 decisions and working from what was decided.

17 And what Melissa responded when  
18 Zea was asking that question about how many  
19 years, you know, the step-down idea was every  
20 5 years less and less of the synthetic  
21 methionine would be allowed.

22 And this proposal actually does

1 not respect that 5-year reduction process  
2 realistically. It changes how it's  
3 implemented but it extends the period we're  
4 currently in. And that's a concern of mine.  
5 I guess I'm raising it that way.

6 I do -- my second point I guess is  
7 to some degree a question and I think -- I  
8 don't know in what capacity you want to  
9 respond to this, but Mac, you as the lead  
10 person on this topic made a comment about your  
11 personal situation and it was unclear to me if  
12 the birds that you are -- you said the birds  
13 -- I'm not going to quote you accurately but  
14 they don't get all of their methionine needs  
15 met by the insects.

16 But you didn't say, and I'm  
17 curious if you would please say, if you  
18 provide them with -- if you use synthetic  
19 methionine in your poultry-raising. Because  
20 that wasn't clear to me. So I don't know if  
21 you're willing to respond to that.

22 CHAIR STONE: Sure. No, we use a

1 crabmeal and/or a fishmeal. And among other  
2 natural -- we don't use any synthetic vitamins  
3 or minerals in our poultry ration. It's  
4 outrageously expensive. We sell eggs for \$7  
5 a dozen at our farmer's market. We don't have  
6 enough of them. I wish we had more.

7 Our customers tell us that our  
8 eggs are different than organic storebought  
9 eggs. Their public comment referencing  
10 systems, how do these different systems  
11 address this methionine issue.

12 And we know that there's variable  
13 systems in the poultry industry. And that's  
14 a bigger picture that I think this Board and  
15 the program is working at. But short answer  
16 is no, I don't use synthetic methionine.

17 MEMBER BONDERA: Thank you for  
18 that. I just wanted to make sure it's clear  
19 to the whole Board and to the public that this  
20 is not something that all poultry producers  
21 are dependent upon. And I think it's a  
22 critical variable to consider and to be aware

1 of.

2 And my final point isn't really  
3 again a question per se but it's to bring up  
4 another topic which is one of the things we  
5 discussed in this conversation within the  
6 Livestock Subcommittee and I think it's pretty  
7 important in my opinion and I think we should  
8 discuss it further in this context is  
9 considering and/or looking at the alternatives  
10 that do exist internationally.

11 And I think that Calvin may or may  
12 not have comments from his research on that  
13 that he'll be sharing this morning. But I  
14 think that it's not as if there are no other  
15 alternatives already being used in different  
16 ways.

17 And so I think that we can't -- I  
18 think getting the ball rolling is good, but I  
19 think my point is the ball is rolling and we  
20 need to recognize that and acknowledge that.  
21 So that's what I wanted to say. Thank you.

22 CHAIR STONE: Wendy?

1                   MEMBER FULWIDER: We all  
2 understand and respect that we want to get the  
3 synthetics off the list. But the bottom line  
4 really is that the chickens need the  
5 methionine because it's going to be a big  
6 animal welfare issue for the organic industry.

7                   So I'm not sure how you can keep  
8 that with your research priorities. I mean,  
9 everybody needs to understand that until we  
10 have the alternatives available for the  
11 producers we have to have the methionine  
12 available.

13                  CHAIR STONE: Jean.

14                  MEMBER RICHARDSON: This is a very  
15 difficult decision for me to make as a  
16 consumer representative on the Board, s real  
17 challenge. And I would like to thank Colehour  
18 and especially Jay for their really articulate  
19 comments on this.

20                  And I agree with them all although  
21 I will be voting in favor of this motion on  
22 the methionine.

1                   It's been my observation over the  
2                   last many decades that the way we've bred  
3                   chickens into the lines that are going to be  
4                   very fast-growing broiler birds and the lines  
5                   that are going to be the egg producers, we've  
6                   really selected for animals that grow very  
7                   fast and are expected to produce large amounts  
8                   of eggs or large amounts of meat in an  
9                   extremely short period of time.

10                   And we have a national policy of  
11                   cheap food. And we expect to get these  
12                   expensively produced animals, we consumers are  
13                   a fickle lot, for still as cheap as possible.  
14                   And I think that's placed a great pressure not  
15                   just on conventional but certainly even more  
16                   so on organic farming.

17                   So, we know that these new breeds  
18                   of hens require very large nutritional inputs  
19                   and over a long period of time. We want eggs  
20                   12 months of the year. We don't want little  
21                   pullet eggs, and we don't want them different  
22                   sizes, we want the eggs large and we want

1 enough meat on the bird so that there's not  
2 much left over afterwards when it's a meat  
3 bird.

4 So at the moment I actually don't  
5 think that we have much choice if we're really  
6 going to meet consumer demand that we're going  
7 to have to maintain these methionine levels  
8 and send two messages.

9 Send Jay's message and my message  
10 at the same time to the administration  
11 reminding them that what we really need are  
12 those new rules that will allow more of these  
13 hens to be outside in pasture most of the time  
14 with proper outdoor access, critically  
15 important.

16 Because we consumers expect that  
17 those sweet, happy little chickens have been  
18 out there on little family farms with all  
19 kinds of pasture to eat as much as they can  
20 during the year. So it's not a simple  
21 decision for us to make here.

22 And I know that the egg producers

1 that I've talked to in the Northeast that are  
2 running many, many small farms like the guy we  
3 heard from yesterday. Consumers we have one,  
4 Pete and Jerry's, I think that's what the  
5 right name is, in New England they too have  
6 lots of small family farms that -- where the  
7 animals, the birds are out on pasture all the  
8 time. But their production costs are of  
9 course higher than the very large industrial  
10 so-called farms where eggs are coming out much  
11 more cheaply.

12 So we have -- and they, even the  
13 small family farms in New England, they also  
14 need the methionine based on the observations  
15 that I've made at the present time. So I  
16 shall be voting for this.

17 CHAIR STONE: Tracy?

18 MEMBER MARAVELL: I'd like to  
19 thank everybody for their comments. I think  
20 my opinion has been expressed sort of equally  
21 around the various comments.

22 I'd also like to tell everyone how

1 much I appreciate that we have three hours in  
2 the Livestock Committee for debate. If this  
3 is the discussion for the first material we've  
4 got a long way to go.

5 I would like to remind everybody  
6 that the step-down that we've proposed of 2  
7 pounds over the life of the bird, average over  
8 the life of the bird still doesn't adequately  
9 meet the demands for broilers as we heard in  
10 written and public comments yesterday.

11 I do think that we have not let up  
12 the pressure for incentives because that  
13 component of the industry is still going to be  
14 a little bit behind the eight ball and still  
15 looking for alternatives. So, lest we think  
16 that we're somehow letting off the pressure we  
17 need to recognize that there is still a  
18 component of this industry that's going to be  
19 pinched pretty badly and is going to be  
20 raising a ruckus.

21 I personally feel that the photos  
22 shown to us yesterday in public comment were

1 very compelling. We can all sit here and  
2 argue philosophically about synthetics and  
3 organics but when you look at animals that are  
4 suffering.

5 I completely agree with Wendy's  
6 comments. Whether or not we feel it's what we  
7 want, we cannot in my opinion ethically and  
8 morally allow animals to suffer because of a  
9 standard that we're trying to reach.

10 I would also say that this in  
11 large part is a situation of our own creation.  
12 The Livestock Committee three meetings ago I  
13 guess floated an omnivore methionine  
14 questionnaire discussion document where we got  
15 emphatic feedback that meat scraps and meat  
16 alternatives or meat byproducts were not an  
17 alternative for us.

18 And so we forced an omnivore to  
19 consume a vegetarian diet and now we're all  
20 wailing and gnashing our teeth that we have to  
21 include a synthetic to accommodate that. So  
22 we need to think about that.

1                   And obviously this is a very  
2                   difficult decision. We're trying to balance  
3                   competing agendas and objectives but in the  
4                   end we've created this situation and I think  
5                   it behooves us to take in the animal welfare  
6                   considerations that we've created because of  
7                   the situation.

8                   CHAIR STONE: Calvin?

9                   SECRETARY WALKER: There's a  
10                  saying be careful what you ask for because you  
11                  might get it. And I say that is that I would  
12                  like to disclose that I do use methionine from  
13                  ADM as well as lysine. It is a difficult  
14                  thing.

15                  And we were told during the  
16                  training session to stay in our lane. And in  
17                  this, Jean and Jennifer, we are a  
18                  representative of the public.

19                  And it's not often that the group  
20                  that we represent, they're generally on the  
21                  same side. But on this particular issue some  
22                  of the public interest groups are with the

1 business interests. It's not often that you  
2 see Cornucopia and OTA on the same side. Just  
3 clearly saying that. And that was a game-  
4 changer for me to think about.

5 And not only that in our research  
6 priorities that, Zea and Jennifer that you all  
7 led, one of the priorities was methionine  
8 research.

9 And the Secretary of Agriculture  
10 with his Organic and Sustainable Agriculture  
11 Working Group, three weeks ago Mark passed out  
12 the findings of the different priorities that  
13 we asked that USDA do research on. And I  
14 believe that USDA ARS is a very independent  
15 body.

16 If you look at their  
17 recommendation for methionine it said to  
18 continue it and they endorsed the idea of  
19 looking at doing research in that area. And  
20 that was in the document that was passed out  
21 to us I believe Tuesday by Mark if you read  
22 the methionine USDA recommendation, the

1 scientists and to me that was also a game-  
2 changer.

3 And plus, my stakeholders are all  
4 over the place as it relates to this  
5 particular matter.

6 And then the last thing I would  
7 like to say is that we know that organic  
8 aquaculture will come. And some of these  
9 particular systems will be requiring, what, 25  
10 and 30 percent non-organic materials to feed  
11 fish.

12 And yet, this level of methionine  
13 is not even 1 percent of the diet. So, as a  
14 representative of the consumers my intent is  
15 to vote yes on this, I call it a modified  
16 step-down. Even though I would like to see  
17 more research continue.

18 CHAIR STONE: Francis?

19 MEMBER THICKE: Thank you. In the  
20 interest of full disclosure I have 20 chickens  
21 on my farm. And their role is to help control  
22 the flies around the barnyard. They do a

1 great job. Obviously they're outdoors.

2 But I think that the outdoor  
3 thing, it's important to consider this in that  
4 context. Nick and Mac both talked about how  
5 it helps their methionine needs for  
6 supplemental.

7 And I had an interesting  
8 experience recently. I got some new chickens  
9 this year because my old chicken house I shut  
10 down and over the winter I didn't have any.

11 So I built a new chicken house  
12 and, Mac, by the way I put an automatic door  
13 so it opens in the morning and closes at night  
14 all by itself.

15 But first I bought six chickens  
16 from somebody and they were outdoor chickens.  
17 They ran around right away.

18 And then I bought about 10 pullets  
19 just beginning to lay. And I put them in  
20 there. And they apparently hadn't been  
21 outside before. And it took them about a week  
22 before they finally looked out the door. The

1 door was wide open. And then they started to  
2 slowly look around.

3 And finally they found the grass  
4 and pretty soon they were eating grass, and  
5 eating insects, and scratching around, and  
6 making dust baths, and so on. And la dolce  
7 vita, you know?

8 But that got me thinking about  
9 these large poultry houses where they have a  
10 little door and they have 100,000 birds and  
11 even if they got out there it wouldn't be  
12 outdoors. It's not outdoors.

13 And so I think we have to look at  
14 this. And this access to outdoors already in  
15 the rule would be enough to change that  
16 situation. That's not workable.

17 And while I'm on that point,  
18 another experience I had recently related to  
19 the economic analysis for the outdoor access,  
20 or for the chicken animal welfare thing is  
21 usually I grow all my own grain for my animals  
22 and my dairy cows. But I ran out this year.

1                   And I called National Farmers  
2                   Organization, broker, organic broker, and I  
3                   told them I need a load of organic grain. I  
4                   usually get barley or wheat or Triticale. And  
5                   he got me a load of Triticale.

6                   But he said there's no corn out  
7                   there. He said these huge chicken producers  
8                   are just sucking it all up. And you can't  
9                   even get it and it's sky high prices.

10                  And I thought that isn't in the  
11                  economic analysis for this animal welfare  
12                  thing. All the livestock producers,  
13                  especially in Northeast U.S., the dairy  
14                  producers, they can't hardly get corn. It's  
15                  expensive. It's driving them out of business.  
16                  And that wasn't in the economic analysis. And  
17                  that needs to be in the economic analysis I  
18                  think.

19                  So, to me that's a big part of the  
20                  whole issue. But I've seen over the years  
21                  chickens cannibalize each other and so I don't  
22                  think we can use methionine to try to change

1 the animal welfare standards. It's like  
2 trying to wag the dog with the tail. We have  
3 to fix that problem. We have to fix that  
4 problem.

5 But I think we can't make the  
6 chickens bear the brunt of it. And so I'm  
7 going to have to vote for the proposal.

8 CHAIR STONE: John, do you want to  
9 wrap this up?

10 VICE CHAIR FOSTER: I think this  
11 is a really reasonable approach. Everything  
12 I've heard sounds like it respects some data  
13 that I think was given in good faith.

14 I think anyone, any producers that  
15 don't think we're suddenly taking pressure off  
16 are just not paying attention. Because  
17 obviously these deliberations, if they're not  
18 indicating the pressure is still on I don't  
19 think they'll probably be in business very  
20 long. I don't think the pressure is coming  
21 off. I think this is just a reasonable  
22 approach to accommodate new information which

1 we asked for. We got new information. We are  
2 adapting, just like every iteration of this  
3 Board has always done.

4 Every Board with a vote says we  
5 think X, Y, or Z needs to happen. Next Boards  
6 come in and say hey, this is new information.  
7 We think W ought to happen. And that's what  
8 that iteration of the Board does.

9 So with respect to giving respect  
10 to past Boards I think we -- we do that every  
11 day. We're just doing it with new  
12 information. We adapt and we overcome.

13 Some of the best and brightest  
14 have done that for many, many years. I think  
15 this Board is a good example of that. That's  
16 all I have to say.

17 CHAIR STONE: Good. So Madam  
18 Chair, I'll close this out. A couple of  
19 comments on alternatives.

20 We heard that a variety of oats  
21 called naked oats are very easily digested and  
22 good for the chickens and can help with this

1 overall get away from the corn thing, Francis.  
2 So we've grown in the last two years because  
3 the birds rarely accept them.

4 Well, as soon as they get ripe  
5 just like raccoons and sweet corn, the wild  
6 birds came in, harvested everything we had and  
7 we didn't hardly -- it wasn't even worth  
8 harvesting the field. So, just an example of  
9 how difficult developing some of these  
10 alternatives can be.

11 And I don't want to go off the  
12 deep end of how we as a Board, we hear from  
13 the community. But where does retail drive  
14 farm policy. And if that impacts the  
15 livelihood or the well-being of our farm  
16 animals or farming systems this Board has the  
17 responsibility to balance retail driving farm  
18 policy or farm policy driving retail  
19 availability. It may be one of those  
20 overarching conversations, John.

21 But I think also I want to close  
22 out saying that the program and the audience

1 really appreciates this kind of a go-around  
2 and lots of diversity of opinions and it helps  
3 everybody to know where we come from in our  
4 logic and thinking.

5 So I think with that, Madam Chair,  
6 we'll close out this one.

7 MEMBER FAVRE: Thank you, Mac.  
8 Thank you, everyone.

9 As I said at the top of the  
10 discussion we are going to defer votes until  
11 Friday and in the interest of time which I  
12 think we're going to need. When we planned  
13 this three hours sounded like forever but I'm  
14 rapidly reassessing that decision.

15 So we're going to go ahead and  
16 move onto the next material. We had a  
17 petition for acidified sodium chlorite. Joe  
18 Dickson is the lead on that. Lisa?

19 DR. BRINES: Thanks, Tracy. The  
20 petition for acidified sodium chlorite was  
21 received on April 30, 2012, and was submitted  
22 by Agrosystems International.

1                   The petition requests the  
2                   inclusion of acidified sodium chlorite at  
3                   Section 205.603 of the National List for use  
4                   in organic livestock production.

5                   The material is listed elsewhere  
6                   on the National List at Section 205.605 under  
7                   paragraph B Synthetics Allowed.

8                   In support of its review the  
9                   Livestock Subcommittee did request the  
10                  development of a technical report which was  
11                  completed in 2013 and is posted on the NOP  
12                  website.

13                  There was also a previous  
14                  technical report completed in 2008 in support  
15                  of the review for processing and handling use.

16                  This petition was also on the  
17                  agenda of the October 2013 NOSB meeting which  
18                  was canceled and the proposal has moved  
19                  forward to this meeting instead. Thanks.

20                  MEMBER FAVRE: Thank you, Lisa.  
21                  Joe?

22                  MEMBER DICKSON: So, we evaluated

1 this material over the last half a year or so  
2 and based that review largely on the technical  
3 report that we had available to us as a  
4 subcommittee.

5 It seemed like a pretty cut and  
6 dry evaluation. The material is allowed in  
7 processing for direct food contact. There are  
8 no real safety or environmental issues. Its  
9 environmental fate is very clear and not an  
10 issue.

11 But where the technical report and  
12 the petition didn't convince us was in the  
13 essentiality arena. The technical report  
14 listed a number of alternative teat dips for  
15 mastitis treatment that were available.

16 The petition itself was not as  
17 clear as it could have been in helping us  
18 understand why this material was the most  
19 appropriate material for certain situations.

20 And so we voted as a subcommittee  
21 to not list this material because the  
22 essentiality hadn't been shown to us.

1                   Yesterday we heard public comment  
2                   from two different commenters, one Dan  
3                   Giacomini, our former chair, who is a dairy  
4                   health consultant.

5                   And he took us through some very  
6                   detailed comment that laid out a number of  
7                   ways in which the technical report may have  
8                   been missing key pieces of information or may  
9                   have overstated the availability of  
10                  alternative materials.

11                  And we also heard from the  
12                  petitioner who gave us similar information.  
13                  So, based in that public comment that we heard  
14                  the Livestock Committee met last night and  
15                  discussed this material.

16                  And we feel that there's enough  
17                  question mark here to withdraw the  
18                  recommendation and as a subcommittee  
19                  reevaluate the technical report, whether it is  
20                  in fact sufficient, and how we want to proceed  
21                  as a subcommittee in looking at this material.

22                  Questions or discussion?

1 CHAIR STONE: Calvin?

2 SECRETARY WALKER: I would just  
3 like to add I believe it was my first Board  
4 meeting one of the things that I found strange  
5 was that written comment, oral comment, and  
6 this Board make decisions on things that  
7 sometimes need to be vetted beyond 24 hours.  
8 Policy juries, city councils, Supreme Court,  
9 takes longer. And I think that this is one of  
10 these materials that need further  
11 deliberations on instead of trying to make a  
12 decision in 24 hours.

13 CHAIR STONE: John.

14 VICE CHAIR FOSTER: This is one  
15 that was kind of new material for me not being  
16 on Livestock. So, I wasn't kind of up to  
17 speed on it until we all do our cramming for  
18 the previous two weeks prior to these  
19 meetings. So I had kind of so-so feelings  
20 about it.

21 I will say Dan Giacomini whose  
22 work in the field is quite admirable in my

1 opinion, very respected, was pretty compelling  
2 for me.

3 And having had that it allowed me  
4 to kind of go back and re-look at other  
5 material that I maybe didn't have a full  
6 appreciation of before, I didn't have a good  
7 context. Certainly not a practical context  
8 for.

9 And that's what we rely on public  
10 comment for. I thought Dan's comments were a  
11 great example of that. So, I feel like if we  
12 do, you know, decide to go through the vote  
13 I'm feeling very confident that I can make a  
14 reasoned decision on it.

15 CHAIR STONE: Francis?

16 MEMBER THICKE: I think we need to  
17 -- as we proceed we need to look more at the  
18 essentiality -- continue to look at that.

19 I did put on a question on the  
20 dairy listserv, organic dairy farmer listserv,  
21 about 100 members, and I only got one response  
22 back. And it was from somebody who kind of

1 first gave a libertarian slam on bureaucracy  
2 and then said why not include it.

3 And so I didn't really know that,  
4 you know, he really needed it or not. I was  
5 surprised we didn't. So I think we need to  
6 pursue that essentiality.

7 And also, we can look at other  
8 things we need for the TR. But one is I think  
9 when you mix that acid with the chlorite you  
10 need to look at the gaseous thing. We need to  
11 look at the toxicity of that particular  
12 instance of using it for mixing things.

13 CHAIR STONE: Harold?

14 MEMBER AUSTIN: You know, I agree  
15 with the approach that the subcommittee's  
16 proposing to the Board.

17 I think also, just a visual  
18 comment that it kind of helps show the  
19 importance of the combination of not only the  
20 written testimony but also the oral  
21 presentations that we receive. It helps to  
22 bring things I think in a little truer

1 perspective by looking at the combination of  
2 those two.

3 The other thing that I would  
4 suggest to the subcommittee if you do refer  
5 this back to take further review of it, those  
6 are some pretty serious points raised about  
7 the depth or the lack of adequate information  
8 within the TR itself.

9 And I think that would be  
10 something to try to take and put that into a  
11 balance for ourselves but also for those  
12 people sitting in the audience that we've  
13 looked at those issues as they were raised.  
14 And look at that I think would help bring  
15 value to future TRs and stuff. And see if  
16 some of those points were legitimate or if  
17 they were just from a personal perspective.

18 And then when you come back with a  
19 proposal be able to take and inform us on  
20 those findings as well.

21 CHAIR STONE: Joe.

22 MEMBER DICKSON: Thank you,

1 Harold, that's a really good point. Also, it  
2 makes me wish that when we accepted the  
3 technical review we'd had the resources to  
4 look more critically at it.

5 Francis and Wendy fortunately on  
6 the committee have some expertise in mastitis.  
7 Others of us do not. But it really does  
8 highlight the role of finding that deep  
9 technical expertise and really using it and  
10 critically evaluating these materials.

11 CHAIR STONE: I'll make a comment.  
12 I've stated it at the committee level several  
13 times. We have the responsibility to accept  
14 the TR or not as sufficient. And I know I've  
15 often been very uncomfortable. I know what I  
16 see in a TR but often if it's outside the  
17 wheelhouse you don't know what you don't see  
18 or what's not there. So I think we can work  
19 with the program to try to develop those.

20 And we've talked about modified  
21 TRs and specific questions and things. And  
22 that's part of this continual improvement,

1 Miles, that we work with the program to make  
2 our work more efficient and more thorough at  
3 the same time.

4 MEMBER FAVRE: Okay, thank you,  
5 Joe. I'll state again so everyone knows that  
6 we will be deferring the vote or in this case  
7 probably a motion to our voting tomorrow.

8 Okay, next on our agenda is a  
9 verbal update on vaccines from excluded  
10 methods, GMO vaccines. Jean?

11 MEMBER RICHARDSON: So, I'm trying  
12 to keep the GMO vaccines issue alive and well  
13 on the NOSB Board and keep it on the sort of  
14 -- even though it may be somewhat on the  
15 backburner for the NOP in terms of our work  
16 plan, but at each meeting we're going to try  
17 to give an update as to where we are with  
18 developing what the certifiers and the  
19 producers would really like to see, and that's  
20 a list of good vaccines and bad vaccines, or  
21 at least a list of good vaccines.

22 So as you recall, the working

1 group of the NOSB and the NOP and APHIS, we  
2 began working 2 years ago now on issues  
3 surrounding the use of biologic vaccines made  
4 with excluded methods.

5 We hope to get a list for  
6 producers and certifiers that would clearly  
7 make this differentiation between those made  
8 with excluded methods and those not.

9 We eventually reached a sort of  
10 stumbling block which we sort of remain at and  
11 as Zea has found doing the same thing in terms  
12 of seeds, the actual definition of excluded  
13 methods needs updating and that's a big job.  
14 And I'm not sure when that will actually take  
15 place. So these are in a way interim measures  
16 that we've been trying to think what might  
17 work so that we could really keep assuring the  
18 public that indeed in terms of consistency  
19 we're working hard across the country to try  
20 to make sure that we are having non-GMO  
21 vaccines going to our livestock.

22 We understand that certifiers and

1 producers need to know whether or not they're  
2 made with excluded methods. And the common  
3 language they use is the non-GMO language.

4 So just a quick reminder is that  
5 Section 205.238(a)(6) requires that land-based  
6 livestock must establish and maintain a  
7 preventive healthcare practices including  
8 administration of vaccines and other  
9 veterinary biologics.

10 At the present time livestock  
11 producers are allowed to use vaccines as  
12 provided in 205.603(a)(4). However, vaccines  
13 made with excluded methods, GMOs, are  
14 prohibited as provided in Section 205.105(e).

15 And as well aware many people  
16 don't realize this across the country.  
17 Further, there is specific reference that  
18 205.105(e) to provide an allowance for  
19 vaccines made with excluded methods if the  
20 vaccines are reviewed and recommended for  
21 addition to the National List by the NOSB.

22 Such review needs to be conducted

1 in accordance with Section 205.600(a) using  
2 criteria specified in the act at 651.7 and  
3 651.8. And I again remind us on the record  
4 that no such GMO vaccine has been approved.

5 Products containing biologics are  
6 regulated by USDA APHIS Center for Veterinary  
7 Biologics and that's the group that we have  
8 been working with. And I must say Nick and I  
9 have found them to be really very thoughtful  
10 and good people to be working through. And  
11 hopefully we will be able to continue doing  
12 that as the month go by.

13 So it was of some interest that we  
14 heard that the Vermont Organic Farmers had  
15 developed an affidavit seeking information on  
16 vaccines. And so in a way this is sort of a  
17 good news report.

18 Vermont Organic Farmers did a  
19 survey of their farms and they were trying to  
20 get this list that would work for their  
21 farmers. So I asked for a report from the  
22 certifier and Nicole Dehne who is the

1 executive director of that or the head  
2 certifier, I don't remember her important  
3 title. She'll yell at me later I'm sure.

4 And so she's going to help me with  
5 this in just a minute. And certainly as we  
6 present something that's just from one  
7 certifier I know I've been talking to other  
8 certifiers in the room these last few days.

9 If there are any other of you out  
10 there who are certifiers that are in fact  
11 collecting data on all of the various vaccines  
12 that are being used by your producers and if  
13 you've got documents that are good affidavits  
14 and lists of vaccines that you've found to be  
15 acceptable for your producers the Livestock  
16 Subcommittee would really appreciate that.

17 And you could direct them directly  
18 to me and I'll make sure they're properly  
19 distributed. So if, Michelle, we could put up  
20 the NOSB Vaccine Report from VOF I would  
21 appreciate it.

22 And Nicole, if you could come up

1 to the microphone I would appreciate that.  
2 And I'm hoping that everyone is seeing that  
3 here we are the NOSB, the voice of the people,  
4 we're trying to work with stakeholders around  
5 the country. And so it was nice to be able to  
6 work with a member of a certifier group to try  
7 to develop this information.

8 Nicole, I wonder if you could walk  
9 us through the report. We haven't got it yet.  
10 Sorry? Yes, that's it.

11 MS. DEHNE: So, for the record my  
12 name is Nicole Dehne and I coordinate the  
13 Vermont Organic Farmers which is the organic  
14 certification program of NOFA Vermont.

15 And I'm happy to go over kind of  
16 our process and what we found while reviewing  
17 vaccines used by our certified livestock  
18 producers.

19 And you know I want to just say  
20 that any success that we've had really needs  
21 to be put in the context of the type of farms  
22 that we certify. It's not our intention at

1 all to create a list of approved vaccines  
2 that's usable nationwide.

3 So, as this report describes what  
4 we did is we developed a document that was --  
5 the intent was that it would be signed by  
6 vaccine manufacturers to verify whether their  
7 vaccines were produced using excluded methods.

8 And as Jean described the initial  
9 challenge for us was really developing a  
10 working definition for what a vaccine is  
11 that's produced with the excluded method.

12 So we referenced the NOSB's the  
13 Vaccine Working Group interim report and we  
14 developed our document based on that report.  
15 And it aims to define vaccines that would be  
16 considered made with excluded methods and then  
17 therefore prohibited.

18 So probably the most significant  
19 definitions in the document which we pulled  
20 out of the working group report start on the  
21 second page. Number 3. And that talks about  
22 vaccines made with excluded methods include

1 all those vaccines in which specific  
2 modifications, additions, or deletions are  
3 introduced into the viral or bacterial genome.

4 And then we give examples of  
5 excluded methods and examples of allowed  
6 methods. And then we're asking manufacturers  
7 to sign off as to whether their vaccines  
8 qualify.

9 So, last year what we did is we  
10 queried our certification database and we  
11 created a list of all the vaccines used by our  
12 certified organic dairy producers. And then  
13 we contacted the manufacturers that were on  
14 that list.

15 And we currently have 156 dairy  
16 operations out of 189 that are reporting the  
17 use of at least one vaccine. So interestingly  
18 enough, we were able to receive non-GMO  
19 confirmation from the manufacturers of all the  
20 vaccines that were in question on our queried  
21 list. So that was great news.

22 So then what we did was all of our

1 livestock producers beyond just our dairy  
2 producers received a list of all of the  
3 vaccines that we had approved or verified in  
4 January of this year. And then we have been  
5 able to add to this list since we've  
6 distributed it to our producers.

7 So, at this point for the most  
8 part producers contact us now if they wish to  
9 use a vaccine that's not on the list. And  
10 then we will contact the manufacturer and try  
11 to verify whether it can meet the practices  
12 and can be considered made without excluded  
13 methods.

14 So, if you want to -- oh, right,  
15 if you could scroll down, Melissa. This  
16 description, this paragraph here is kind of  
17 what I just described. If you could scroll  
18 down a little bit more I actually included the  
19 list of vaccines here. Next page.

20 So, it's organized by manufacturer  
21 and then this is the list of the vaccines that  
22 we've received confirmation that they're not

1 made with excluded methods.

2 We did contact -- so again, these  
3 vaccines mainly address vaccines used by dairy  
4 producers. Some of the -- one manufacturer  
5 that we did contact, Merck -- and if you  
6 scroll down a little bit, Melissa, you might  
7 see that one -- they did respond by giving us  
8 all of their vaccines including for swine and  
9 for poultry.

10 MEMBER RICHARDSON: And we do have  
11 copies, made about 10 copies of this if  
12 anyone's interested in looking at the list of  
13 the OF accumulated. And if people want to  
14 have copies of it just let me know or come by  
15 and get one.

16 And do we know if we use any  
17 poultry vaccines in Vermont? Or you weren't  
18 looking at that at all, were you?

19 MS. DEHNE: No, so that's a great  
20 question. The poultry producers that we  
21 certify are all under 1,000 birds. Way under  
22 1,000 birds. Our largest poultry producer

1 probably has around 200 birds. So none of our  
2 poultry producers are using vaccines earlier  
3 than past the second day of life.

4 And we have a very small number of  
5 pork producers and they also are not using  
6 vaccines. So again, you should think of this  
7 list in context of the type of farms that we  
8 certify which are primarily smaller dairy  
9 operations and beef operations.

10 But it was interesting that some  
11 manufacturers did provide information for  
12 poultry and swine.

13 MEMBER RICHARDSON: Are there any  
14 questions from the other members of the NOSB  
15 to Nicole on this?

16 Let me just ask you one other  
17 thing. Did you find the manufacturers were  
18 helpful and responsive, and did some of their  
19 own affidavits?

20 MS. DEHNE: Yes, that's a great  
21 question. We did find the manufacturers were  
22 very helpful and receptive. And we also came

1 across an affidavit from a large dairy  
2 operation that was obviously verifying their  
3 vaccines as well. So we're certainly not the  
4 only ones that are out there doing this was my  
5 assumption.

6 MEMBER RICHARDSON: Great. So  
7 thanks very much, Nicole. I really appreciate  
8 you coming and giving this information and for  
9 doing this work.

10 And again, as I say to other  
11 certifiers, if you have similar affidavits and  
12 lists I sure would appreciate it because we  
13 don't really want to let this issue sort of  
14 die before we come up with a list that would  
15 be a useful thing to use throughout the  
16 country.

17 And as far as I know that's going  
18 to be only the poultry area that's going to be  
19 a slight challenge for us in finding a non-GMO  
20 vaccine for one of the salmonellas.

21 Otherwise I think that we should  
22 have enough vaccines that are used around the

1 country that it's easy for all of our organic  
2 farmers to find appropriate non-GMO vaccines  
3 to reassure the public that indeed we're all  
4 making a concerted joint effort to make sure  
5 there are no GMOs in the food stream. Thank  
6 you.

7 MEMBER FAVRE: Thank you, Jean.  
8 Well, I feel like we should have a drum roll  
9 and a crescendo. We are now ready to start  
10 our discussion on the aquaculture materials.  
11 The first one on the agenda. I almost feel  
12 like we need to stand up and everybody limber  
13 up and get loose and get ready.

14 Okay, first proposal for  
15 aquaculture is chlorine for aquatic animals.  
16 Joe Dickson is the lead on that. Lisa?

17 DR. BRINES: Thanks, Tracy. The  
18 petition for chlorine for aquatic animal use  
19 was submitted on April 19, 2012 and was  
20 submitted by the Aquaculture Working Group.  
21 The petition requests the inclusion of  
22 chlorine for aquatic animal use in addition to

1 the National List.

2 This particular agenda item was a  
3 carryover from the fall 2013 meeting that was  
4 canceled and the subcommittee proposal was  
5 revised in response to comments from that  
6 comment period.

7 There was no new technical report  
8 for chlorine. There are existing technical  
9 reports from 2011 for crop uses as well as for  
10 crop handling and processing uses from 2006  
11 and some earlier ones.

12 There is also chlorine  
13 consideration on the agenda for aquatic plant  
14 use and we'll be discussing that later this  
15 morning. Thanks.

16 MEMBER FAVRE: Thank you, Lisa.  
17 Joe?

18 MEMBER DICKSON: Thank you, Tracy.  
19 So, to start out, my notes here are pretty  
20 complicated.

21 The process we followed with  
22 chlorine was a little bit confusing for the

1 committee in that we wanted to capture the  
2 intent of the petition and that is the desired  
3 use of chlorine.

4 We wanted to come up with a  
5 listing that was consistent with other uses of  
6 chlorine on the National List. And we thought  
7 we did that.

8 Basically, so the petitioned  
9 annotation for chlorine or the intent of the  
10 petitioner was to use chlorine as a  
11 disinfectant as the material is currently used  
12 in handling with the additional use in culture  
13 water.

14 Our original thinking was to match  
15 the current handling listing which restricts  
16 the residual chlorine levels in the water to  
17 the level set by the Safe Drinking Water Act.

18 After we made that initial  
19 recommendation we learned from the program  
20 that the program's intent had been to change  
21 that listing to specifically mention the  
22 effluent water rather than the water itself to

1 clarify that we're not restricting its use in  
2 the sanitizing water but rather the effluent  
3 water from the facility.

4 So we had some go-around with the  
5 program on that and I think finally arrived at  
6 a proposed annotation that works and suits  
7 everyone's intent.

8 Lisa, does that make sense and  
9 does that correctly capture sort of our  
10 process?

11 DR. BRINES: Yes, I believe so.  
12 Thanks.

13 MEMBER DICKSON: Thank you. I'm  
14 glad to hear that makes sense because I'm  
15 still trying to sort it out in my own notes  
16 here.

17 But bottom line is we wanted to  
18 write an annotation for use of chlorine that  
19 was identical with how it's used right now in  
20 food processing. To be used for sanitizing  
21 facilities and equipment including culture  
22 water and aquaculture applications.

1                   The one new topic for the listing  
2                   was the sort of question of culture water  
3                   where chlorine is essentially used to  
4                   sterilize water and eliminate any existing  
5                   organisms before establishing new cultures in  
6                   the water.

7                   I believe it was Francis on the  
8                   last subcommittee who brought up a really  
9                   interesting question which was is that -- do  
10                  we want to look at that use of chlorine in  
11                  culture water as similar to the practice of  
12                  soil fumigation.

13                  You know, from a sort of organic  
14                  philosophy perspective is this sort of  
15                  practice of wiping out the existing  
16                  microorganism population of water consistent  
17                  with the principles that we're here to uphold.

18                  I'd say that conversation is  
19                  ongoing within the Livestock Committee but  
20                  definitely one for discussion here.

21                  And that really concludes my  
22                  general introduction.

1                   CHAIR STONE:  Are there questions,  
2                   comments?  Start a conversation around this  
3                   material?  Zea?

4                   MEMBER SONNABEND:  Thank you, Joe.  
5                   The issue of culture water was not made clear  
6                   at all in this checklist or the way the  
7                   recommendation was framed to someone who did  
8                   not participate in the Livestock Subcommittee.

9                   I know it was petitioned for  
10                  culture water but nowhere in the actual  
11                  listing does it -- you know, the whole text  
12                  talks about we're going to make this similar  
13                  to the rest of the listed uses of chlorine,  
14                  but that's not an already listed use of  
15                  chlorine.

16                  And nowhere in the text of what  
17                  was passed does it say this is also approved  
18                  for culture water.  So I would assume from  
19                  reading it it is not approved for culture  
20                  water.

21                  I mean that's just how you read  
22                  it.  It's only allowed for disinfecting and

1 sanitizing facilities and equipment. That's  
2 what it says.

3 Furthermore, while I know there's  
4 been many TRs in the past on this none of them  
5 had to do with culture water at all. And I  
6 really feel that it needs to be studied, the  
7 checklist needs to be studied for what happens  
8 when it's used in culture water.

9 Because like for instance, I don't  
10 see how this is different than soil  
11 fumigation. You're sterilizing everything in  
12 the water just like you would with methyl  
13 bromide. So maybe it's not that bad but I  
14 would really like to see that studied with a  
15 TR and/or expert opinion and then specifically  
16 talked about in the checklist with, you know,  
17 what would happen to the effluent water from  
18 culture water. Are there trihalomethanes for  
19 them that sink to the bottom of the pond?

20 And plus, it doesn't distinguish -  
21 - and I'm just having to assume this here  
22 because it wasn't made clear in the thing --

1       whether you'd try to sterilize a net pen in  
2       the ocean which I'd hope you wouldn't even  
3       try.  But that this is only for ponds.

4                   I mean, I just really think it  
5       needs to be distinguished, the culture water  
6       thing which is a new facet of it.

7                   And so I feel like I could not --  
8       no way could I vote for or against this motion  
9       it being incomplete in this form.

10                   And I would say that the same  
11       thing applies to the chlorine for plants so I  
12       don't have to repeat myself there.

13                   CHAIR STONE:  Zea, thank you.  So  
14       this is exactly what the subcommittee is  
15       looking for, to have this extended view, the  
16       extended perception of the materials and the  
17       process of evaluating these from those outside  
18       the committee.  And let the audience know how  
19       we're not finished doing our due diligence on  
20       these.  So, thank you.  That's exactly what  
21       the committee wants to hear.  Francis?

22                   MEMBER THICKE:  I think it's

1 pretty obvious too that the reason we couldn't  
2 really figure all this out is we don't have  
3 any standards. And so we don't know for sure  
4 what we're trying to sanitize and what we're  
5 trying to do here.

6 CHAIR STONE: Colehour?

7 MEMBER BONDERA: Yes, I don't mean  
8 to cause any unpleasantness in this  
9 conversation, but I do want to note that as a  
10 Livestock Subcommittee member, and I  
11 approximately Zea's input at this point in  
12 time, frankly and realistically as a minority  
13 opinion on these conversations I brought up  
14 most every one of those points in most every  
15 one of those same kind of approaches within  
16 the subcommittee that we consider, listing in  
17 an annotation this is only for certain uses,  
18 and the whole culture water discussion, and  
19 all of these other issues.

20 And so I don't think it's bad to  
21 bring it up again, but I think we need a  
22 context in which we're going to do something

1 with these things. For example, within these  
2 recommendations, these proposed  
3 recommendations at the subcommittee level I  
4 think that that could or should have been put  
5 forth as this was brought up as one minority  
6 discussion points.

7 So that people like Zea not on the  
8 subcommittee would be aware that at least it  
9 had been considered so that the whole NOSB  
10 isn't thinking this is brand new in process.  
11 Because I think we need to make our process a  
12 little bit more efficient, frankly, for that  
13 reason. Thank you.

14 CHAIR STONE: Jay?

15 MEMBER FELDMAN: Yes, thank you.  
16 Just to echo Colehour's sentiment here. The  
17 Livestock Committee was given a checklist from  
18 the Crops Subcommittee which included this  
19 exact conversation.

20 All of that information was  
21 stripped out of the Livestock Committee  
22 checklist. The minority position was

1       relegated to the back of the checklist in a  
2       narrative form.

3                    You know, this is the credibility  
4       of the organic label.  And either way you cut  
5       this, Mr. Chair, if you come to this body in  
6       a public forum, this meeting and say to the  
7       subcommittee, well, we've been looking at this  
8       thing for a year and we got new information at  
9       this meeting that is causing us to return this  
10      issue back to subcommittee I personally feel  
11      it makes this Board look foolish.

12                   On the other hand, if you admit  
13      that we did evaluate a lot of these issues and  
14      we chose to ignore them I think that makes the  
15      process look somehow deficient.

16                   So I hope we can take from this  
17      the need that I think the community has that  
18      we give voice through this process to all the  
19      views.

20                   One of the issues, Joe, that I  
21      know was raised in the context of this  
22      discussion was the distinction between the

1 Safe Drinking Water Act and the Clean Water  
2 Act. That was brought to the subcommittee by  
3 the minority view.

4 And again, that issue which is a  
5 technical issue of import to the deliberations  
6 of this Board was not addressed or  
7 incorporated into the checklist.

8 I know some people feel it's  
9 confusing to have a checklist which  
10 incorporates a variety of opinions, but I  
11 think the credibility of the label ties to the  
12 fact that the public can point to and see that  
13 this Board deliberated fully and reached a  
14 conclusion that it believed in its best intent  
15 meets the standards of the statute.

16 And I think with regard to this  
17 material in particular, but others as well,  
18 when we're talking about a chlorine-based  
19 economy and a chlorine-based food supply which  
20 is exactly the kinds of materials the public  
21 supporting organic wants to get away from we  
22 have to be very careful that we explain the

1 justification for these uses and show due  
2 diligence.

3 I think every attempt was made to  
4 do this through the subcommittee process. I  
5 know the information and if you go back to the  
6 checklists that were prepared and then  
7 withdrawn for the last meeting that was  
8 canceled I think you'll find that the  
9 committee and the Board, or the committee at  
10 the least, the Crops Committee did its due  
11 diligence on this issue.

12 So, again, I support the hard work  
13 of Colehour to bring these issues forward.  
14 And I hope as we discuss moving forward on  
15 this that we can incorporate these issues into  
16 our review.

17 CHAIR STONE: Tracy and then Jean.

18 MEMBER RICHARDSON: A point of  
19 order or clarification, Mr. Chair, is that  
20 many of Jay's comments are actually  
21 referencing really the chlorine in the plants  
22 one which we haven't yet got to. So, if we

1 can hold all your comments and sort of --  
2 because right now Joe's only discussing the  
3 chlorine in the animals thing because that --  
4 for which -- for the plants there is a long  
5 minority opinion.

6 CHAIR STONE: Tracy?

7 MEMBER FAVRE: Thank you, Jean.  
8 That was one point I was going to make.

9 And there is a minority opinion  
10 that is fairly lengthy that's attached to  
11 chlorine for aquatic plants.

12 I will just say that, Colehour, I  
13 appreciate your comment that you're not trying  
14 to be contentious. I think we did have  
15 collegial conversations about this in  
16 subcommittee. I hope you feel that way. You  
17 indicated as such I think to me anyway.

18 The issue about the checklists  
19 which Jean has rightfully pointed out, excuse  
20 me, belong more to the aquatic plants and  
21 aquatic animals was an issue that we discussed  
22 essentially one whole meeting when we first

1 received the material -- materials from Crops.  
2 And we had a pretty lively debate about  
3 philosophically how we wanted to make sure to  
4 represent all of those opinions.

5 And it was the consensus of the  
6 subcommittee. In fact, I think there was --  
7 maybe Colehour was the only dissenting vote on  
8 that -- that we felt very strongly that it was  
9 our job as a subcommittee to come forth with  
10 a recommendation that clearly presented the  
11 reasons for why the recommendation was going  
12 the way it was, but still left room for  
13 commentary and discussion from minority  
14 opinions.

15 That is specifically the reason we  
16 elected to untangle the checklist which I  
17 think most of us felt was very confusing and  
18 left not only the remainder of the Board but  
19 the public as well very confused as to what a  
20 clear recommendation was.

21 We want to make sure that there's  
22 an opportunity for all sides to be presented.

1 And I'll remind you, Jay, that specifically  
2 one of the reasons we brought these proposal  
3 to the full Board was so that we could have  
4 this discussion on the public record within  
5 view and sight of the public and stakeholders  
6 that are interested in this to make sure that  
7 we have an opportunity to present all sides of  
8 the issue. Thank you.

9 CHAIR STONE: Calvin.

10 SECRETARY WALKER: Jay, are you  
11 saying that for the checklist the minority  
12 opinion should be a part -- be placed as a  
13 part of that right? It seemed like that may  
14 be --

15 MEMBER FELDMAN: I think the  
16 attempt of the minority as I understood it on  
17 the calls that I listened into and observed  
18 was to incorporate into the checklist the  
19 issues of chlorine that have been previously  
20 addressed by the Crops Committee. And that  
21 those issues applied both to chlorine use in  
22 animal agriculture -- or aquatic agriculture

1 as well as crop aquaculture.

2 So, I, you know, I don't  
3 understand why that -- it was so difficult to  
4 incorporate those issues. I thought that was  
5 the whole point as you say, Madam Chair, to  
6 bring the two committees together and  
7 incorporate the issues of concern which are  
8 issues related to the categories under the  
9 checklist related to adverse impacts on the  
10 environment. And incorporate those very same  
11 questions.

12 Is there a persistence or  
13 concentration of the material or breakdown  
14 products in the environment? I mean, that's  
15 an issue whether we're talking about crop  
16 aquaculture or animal aquaculture. It's the  
17 same issue.

18 And that was just my point, that  
19 the minority was attempting to incorporate key  
20 scientific issues. And the only thing that is  
21 in here is chlorine dioxide is reactive and  
22 breaks down quickly. That's what's in here.

1                   So, I -- and then other things  
2                   about it degrading rapidly in the environment.  
3                   Yes, a lot of that's true. But where is the  
4                   information on the potential adverse effects  
5                   in the animal side?

6                   So yes, that was my point. Just  
7                   to try to -- I hope -- you know, I know  
8                   there's well intentions behind this. I'm not  
9                   criticizing any individual. I'm just hoping  
10                  that we can create a document that  
11                  incorporates in a more easily understood  
12                  manner if it was confusing in the past, but  
13                  clearly incorporates into the checklist the  
14                  different viewpoints so that everybody knows  
15                  that we've done our due diligence. I feel  
16                  it's left out of here.

17                  CHAIR STONE: Joe? Harold?

18                  MEMBER AUSTIN: While I don't sit  
19                  on the Livestock Subcommittee I am a part of  
20                  the Crops Subcommittee and was a part of the  
21                  deliberation when the aquaculture materials  
22                  that we had were there until we combined them

1 with the Livestock Subcommittee.

2 And I applaud what you guys have  
3 done with the proposals. You've cleaned up  
4 the checklist rather than diluted them.

5 The way they were written I think  
6 for even those of us on the subcommittee by  
7 trying to interject the majority and the  
8 minority opinions within the context of the  
9 checklists themselves actually made a very  
10 convoluted hodge-podge of what we had in front  
11 of us.

12 It made it very difficult to  
13 understand because the points kept crossing  
14 over. You'd have the majority and then we  
15 would have the minority got inputted into  
16 that.

17 I think by pulling it out and  
18 addressing that in the minority opinion at the  
19 end of the document makes a very clearer, more  
20 concise, more transparent document for  
21 everybody to understand and be able to take  
22 and move forward.

1           I think the thing we also have to  
2 look at is the stuff that we put forward now  
3 as a Board are going to be reference points  
4 for those that follow us in our footsteps down  
5 the road. And we need to make sure that we  
6 leave a clear and concise path and trail for  
7 those to follow that have to make future  
8 decisions that we're going to leave for them.

9           So I think what you've done was  
10 the right move to do on behalf of myself. I  
11 mean it was my personal opinion but I think  
12 it's made a much, much better document.

13           CHAIR STONE: And I would suggest  
14 that we had conversation and we talked with  
15 the Standards staff. And there's two  
16 objectives here, Jay, of being sure that  
17 everyone understands we considered the various  
18 factors, the various implications, but also  
19 that the Standards staff has a clear picture  
20 as they go into rulemaking.

21           So in my opinion as Harold  
22 represented if it didn't do that -- and we are

1 going to rework these I think. If we didn't  
2 do that we'd have two objectives. Be sure  
3 that everyone knows we did our due diligence,  
4 but also that the Standards staff has clear  
5 information with which to begin the rulemaking  
6 process. Zea?

7 MEMBER SONNABEND: I think this  
8 goes beyond majority/minority opinion to  
9 really doing a good job on the checklists  
10 though. Which isn't to say that -- I mean I  
11 appreciate that it's cleared up in this form  
12 so that it isn't all this minority/majority.  
13 But I think it could be a more complete  
14 statement of the facts.

15 And especially regarding this  
16 question 6 here of the persistence and  
17 concentration in the environment which is the  
18 key one that would be different between a use  
19 as a disinfectant where the statements here  
20 apply to its use as a disinfectant in the  
21 presence of air and sunlight.

22 If it's used -- it should have

1 another paragraph in it that says when used in  
2 culture water which would be in a big tank  
3 indoors or a big pond in water without air and  
4 sunlight here's what might happen to it and  
5 here would be the fate. And that might be a  
6 quite different but yet factual statement  
7 compared to what happens for it as a  
8 disinfectant.

9           And I really feel that we could be  
10 a little more thorough in this case without  
11 saying -- you know, then you draw your own  
12 conclusion from it, is it good or bad, or  
13 majority or minority. But you have a more  
14 thorough statement.

15           And if you can't create that  
16 statement by yourselves because you don't know  
17 then we need a TR and expert assistance with  
18 it.

19           CHAIR STONE: Calvin?

20           SECRETARY WALKER: It seemed to me  
21 looking at the minority opinions that Colehour  
22 placed in the aquaculture petitions it seemed

1 like it would be okay if you have a minority  
2 opinion. If you want to put it in a paragraph  
3 form essentially that's what the minority  
4 opinion was.

5 For each of the three criterias  
6 for -- that we was evaluating Colehour had it  
7 in a paragraph form. To me he could have  
8 easily placed it in a tabular form with the  
9 same thing as the minority opinion. Because  
10 at the end of the day when they go to  
11 rulemaking only the majority is going to carry  
12 the day.

13 So I look at category 1, category  
14 2, category 3. They -- I could easily see  
15 they are his response being put in the  
16 checklist, but why not -- instead of putting  
17 it in a paragraph form place it in a tabular  
18 form as the minority opinion. It's  
19 essentially the same. It's a checklist  
20 without the table already.

21 CHAIR STONE: So, Madam Chair, in  
22 a little bit of essence of time here. So,

1 this first material I think we were able to  
2 get a lot of those generic sort of process  
3 things on the table. And I think we won't  
4 have to spend as much time around this process  
5 and this education.

6 I know the Standards staff also  
7 uses these comments, the transcripts, not just  
8 recommendations. So they comb through every  
9 word as they're working through the rulemaking  
10 process.

11 But, so with some of that, if  
12 there's other generics, you know, I'm not  
13 squandering conversation here, but as we move  
14 through these materials maybe we can not have  
15 to reiterate these types of comments on how  
16 the subcommittee goes forward in the process.

17 So if there's other material-  
18 specific I welcome that. Zea?

19 MEMBER SONNABEND: Did you just  
20 say you weren't going to talk about the rest  
21 of them individually?

22 CHAIR STONE: No, ma'am. I tried

1 to say that if we've covered the generic bases  
2 of the committee's work going forward that we  
3 can keep it to specific as we go through each  
4 one individually around the material itself.

5 MEMBER SONNABEND: I have one more  
6 general statement to make that overarches all  
7 of them. I didn't want to take it all out on  
8 chlorine.

9 I just wanted to be on the record  
10 to point out to people that the majority of  
11 the National List was voted in before there  
12 were published standards in the federal rule.

13 And if the federal rule in 2002  
14 had come out and all the materials were waited  
15 until the rule came out we'd still be here  
16 today hashing it out.

17 So, I pretty much reject this  
18 notion that you have to wait till the  
19 standards are out to review any materials for  
20 it. That being said -- so I don't feel that  
21 that is a reason to hold up everything.

22 But that being said I was somewhat

1 disappointed that the checklist on the whole  
2 did not distinguish very clearly between the  
3 closed system aquaculture and the open net pen  
4 aquaculture.

5           And although we have NOSB  
6 recommendations which will be the basis for  
7 the standards to refer to in deciding on the  
8 materials I did not find the NOSB  
9 recommendation on the open net pens creating  
10 enough illumination to me to be able to  
11 support any of the materials in the context of  
12 net pens since it wasn't discussed in the  
13 checklist specifically. Like here's the  
14 impact of this material in a closed system,  
15 here's the impact of this material in an open  
16 system.

17           So I feel pretty comfortable with  
18 the pond NOSB recommendations that things like  
19 handling the waste water would be dealt with  
20 in an organic system plan.

21           But as far as the net pens  
22 recommendation, even after talking to a former

1 Board member who was there for that debate and  
2 he told me how strict they were I do not feel  
3 comfortable with that use of any of the  
4 materials that is before us.

5 And I would like us to take them  
6 back, to reconsider making a distinction  
7 between net pens and pond systems and perhaps  
8 having separate votes on them for that  
9 purpose.

10 But I'm not using the excuse of no  
11 standards, no materials, because when we did  
12 the list to begin with we had NOSB  
13 recommendations on the different facets of  
14 what became the federal rule and we were able  
15 to create a materials list proposed that could  
16 come out with the regulations. Thank you.

17 CHAIR STONE: Thank you, Zea.  
18 Tracy?

19 MEMBER FAVRE: Thank you very much  
20 for those comments. I think that's going to  
21 be helpful in our deliberations when we take  
22 these back to committee.

1 If there's nothing more on --

2 CHAIR STONE: I've got one more,  
3 Nick and then Jean. That would be two.

4 MEMBER MARAVELL: Zea, I'd just  
5 like to point out I do not share the same  
6 level of assurance that we should move forward  
7 in the absence of standards based upon your  
8 comments.

9 We did have operating standards by  
10 certifiers, public and private, across the  
11 country. Assured there were differences on  
12 materials. We had recommendations from the  
13 NOSB. So I think we should -- we should  
14 acknowledge. Plus we had certain definitions  
15 and guidance from the federal legislation.

16 So I'm just saying that I  
17 understand your point but I think we should  
18 view that point in the context of how we  
19 evolve this. So, I personally think we have  
20 the luxury now of seeing standards before we  
21 approve materials. And I would prefer to go  
22 that way if at all possible.

1 CHAIR STONE: Jean? Want to wrap  
2 this up?

3 MEMBER RICHARDSON: Yes, I agree  
4 with that second part of what Zea was saying.  
5 It was very frustrating to us not to have  
6 adequate information in order to do exactly  
7 what you're saying, that how would these  
8 materials be used in net pens as opposed to  
9 closed systems. It was quite frustrating.

10 The petitions were all, quite  
11 frankly, on the record fairly badly written.  
12 And we received really not -- and even with  
13 experts coming on and explaining how these  
14 materials might be used to some of our  
15 conference calls we really didn't get an  
16 adequate framework because there are no --  
17 apart from the NOSB recommendations which we  
18 did look at of course in fine detail and we  
19 tried to make our sort of analysis somewhat  
20 based on those.

21 Unfortunately without the actual  
22 detail of what the final proposed regulations

1 will look like it was very difficult to do  
2 that depth of analysis.

3 But I really appreciate your  
4 comments that we need to rework those  
5 checklists, all of them, in regards to these  
6 general comments that have come up today. So  
7 I appreciate that very much, thank you.

8 CHAIR STONE: Zea?

9 MEMBER SONNABEND: I just want to  
10 add one supplemental point that Nick brought  
11 up. And I do agree with you, Nick, that we  
12 did have established certifier standards to  
13 work with.

14 And that's what brought to mind  
15 that one other weakness here I thought, and  
16 this is not blame on the NOSB, but it's a  
17 factor of not having TRs done on them, is that  
18 the existing standards in other countries we  
19 did not really take a look at, or at least  
20 maybe the committee did but it did not come  
21 out in these checklists for those countries  
22 who do have standards for aquaculture whether

1 they allow these materials in fish.

2 And that's something I would like  
3 to explore in the absence of our own standards  
4 to at least know what was going on in those  
5 other standards.

6 CHAIR STONE: Great. Well, Madam  
7 Chair, I think that was a great opening  
8 conversation and exactly what I think the  
9 committee was hoping would happen today and  
10 appreciate the good input from the Board. So,  
11 next up.

12 MEMBER FAVRE: Yes, thank you,  
13 everyone. Okay. Next up is tocopherols in  
14 aquatic animal production. Myself and  
15 Colehour were co-leads on this material.  
16 Lisa?

17 DR. BRINES: Thanks, Tracy. The  
18 petition for tocopherols for aquatic animal  
19 use was submitted on April 27, 2012 by the  
20 Aquaculture Working Group.

21 The petition requests the  
22 inclusion of tocopherols for use in aquatic

1 animal production. There's one other listing  
2 for tocopherols on the National List at  
3 Section 205.605(b) for use in handling and  
4 processing.

5 In support of its review the  
6 Livestock Subcommittee did request the  
7 development of a new technical evaluation  
8 report to assist in its review. And that  
9 report was completed in 2013. There is also  
10 additional information from the original  
11 technical advisory panel report for a  
12 processing consideration from 1995.

13 This particular agenda item was  
14 also on the agenda for the October 2013  
15 meeting which was canceled and the  
16 subcommittee proposal was revised in response  
17 to comments submitted for that meeting.

18 Thanks.

19 MEMBER FAVRE: Thank you. I'm  
20 going to make some initial comments. Then I'm  
21 going to turn it over to Colehour.

22 First of all, I'd like to

1 apologize for an error that crept into the  
2 checklist. Under category 2 is the substance  
3 agricultural. It was marked as yes. I  
4 noticed OTA caught that. Thank you very much.  
5 Obviously in other places on the National List  
6 it's considered a non-agricultural synthetic.

7 If we had a category for  
8 agricultural synthetic it might be easier but  
9 that doesn't happen.

10 So anyway, Colehour, I'll turn it  
11 over to you for discussion.

12 MEMBER BONDERA: Okay, thank you.  
13 Yes, to be honest with you all I'm not  
14 prepared to do a general presentation on this  
15 subject area, but I can try in the moment to  
16 accomplish that just in terms of what we as a  
17 subcommittee did with the process.

18 So, I think that there was a  
19 little bit of questioning regarding the  
20 classification issue in terms of the as-  
21 petitioned part. I think that the fact is  
22 that it relates to the clarity that is shared

1 in the listing part regarding whether -- how  
2 the tocopherols are derived.

3 And I think that that's a critical  
4 component. Like it says in the listing motion  
5 tocopherols derived from vegetable oils are  
6 allowed as ingredients in aquatic livestock  
7 production when rosemary extracts are not a  
8 suitable alternative.

9 And so I think that there's a  
10 bunch of questions brought up in there in  
11 terms of how the tocopherols are derived and  
12 what is suitable for what purposes. But I  
13 think that we went through the process. I  
14 think if you look at the checklist you can see  
15 that in a number of cases there are times when  
16 both yes and no are checked because of those  
17 same factors, that there are, for example, in  
18 the same one that Tracy was just referring to,  
19 you know, item number 4, is the substance  
20 created by naturally occurring biological  
21 processes? Well, there are naturally  
22 occurring tocopherols. But the petition is

1 for synthetic tocopherols. So I think that we  
2 need to recognize that range of issues.

3 And I think that how the  
4 tocopherols are extracted was definitely one  
5 of the turning points of our conversation. I  
6 think that we did as a subcommittee, and I  
7 won't be able to quote this accurately, but we  
8 did go, so maybe Tracy will chime in here, we  
9 did go back and forth a little bit with where  
10 we were going to -- what was included as  
11 annotation language and/or specific language.  
12 I believe, and again, I'm not looking at it at  
13 this moment so I can't read it, but I believe  
14 I suggested and for some time period we  
15 actually entertained an annotation that was  
16 more comprehensive than what we ended up with.  
17 Again, I can't quote that. I don't know if  
18 somebody has that available to read.

19 MEMBER FAVRE: Yes, let me address  
20 that. This was one of the proposals that was  
21 originally posted for discussion at the fall  
22 meeting. And so we did receive some public

1 comment back on the more restrictive  
2 annotation that we had put in there which  
3 specifically excluded tocopherols made by  
4 volatile solvents.

5 And the feedback we got from the  
6 comments at the defunct fall meeting was that  
7 there were essentially no such tocopherols  
8 that were commercially available for these  
9 applications.

10 So, I did a little digging after  
11 that public comment period and after that  
12 meeting had been canceled and I did get some  
13 feedback that there are particularly for  
14 personal cosmetic use and personal care  
15 products use organic non-volatile solvent  
16 extracted tocopherols available on the  
17 marketplace.

18 One of the things that I found  
19 that we really struggle with is understanding  
20 true commercial availability in the quantities  
21 necessary. Because we get conflicting  
22 feedback on that on public comment. We don't

1 always have the resources available to gather  
2 that information ourselves.

3 So, while we removed the specific  
4 reference to non-hexane or non-volatile  
5 solvent extractions from the annotation we do  
6 know that there are some organic tocopherols  
7 non-volatile solvent extractions.

8 So this is definitely one of the  
9 ones that regardless of the other public  
10 comments we got for aquaculture in general we  
11 felt like we probably were going to need to  
12 present to the public and post for getting  
13 additional feedback in preparation for this  
14 meeting. But regardless it will be referred  
15 back to committee for a little bit of  
16 tweaking.

17 MEMBER BONDERA: Thank you, Tracy.  
18 I guess that was my final intention was to  
19 read part of the minority opinion into the  
20 record. It does appear in our proposed  
21 recommendation and it does refer to one of the  
22 interactions, a letter from OO Organics which

1 supports actually the consistent availability  
2 of natural tocopherols extracted without  
3 synthetic solvents.

4 And the letter states, "I have  
5 sold non-GMO non-solvent extracted tocopherol  
6 since 2005 both BASF, an international  
7 ingredient manufacturer out of Germany, and  
8 BTSA, a company specializing in non-GMO  
9 tocopherols, supply this material. It is  
10 consistently available and is broadly used in  
11 the food, cosmetic and household cleaning  
12 business.

13 "Additionally, I have been ISO  
14 certified documents for a supplier in China so  
15 I believe it available around the world."

16 So, you know, partly for that  
17 reason I voted and ended up in a minority  
18 position in the discussions with the -- like  
19 Tracy said she and I were co-leading this but  
20 in the Livestock Subcommittee's deliberations  
21 and conclusions.

22 But I think with that I think I

1 feel fine wrapping it up and listening to  
2 other people's input. Thank you.

3 CHAIR STONE: Zea?

4 MEMBER SONNABEND: Well, maybe  
5 this is not a very smart question but I  
6 appreciate the availability of non-GMO non-  
7 solvent tocopherols.

8 But if tocopherols were not added  
9 to the list wouldn't they also have to be from  
10 organic sources? As livestock feed.

11 CHAIR STONE: I take that as a  
12 question to the committee to evaluate. I  
13 would add to that that the committee look at  
14 feed manufacturing for aquaculture animals and  
15 availability of -- we heard at one of the  
16 committee meetings that there's like a cold  
17 water species vitamin mineral pack and a warm  
18 water species.

19 And just because they're available  
20 -- what's the commercial availability and the  
21 ability for feed manufacturers to access them  
22 to get them into these diets. I think we

1 heard some issues around that.

2 MEMBER FAVRE: Yes, I'll just add  
3 that just because they're available on the  
4 market doesn't mean that they're commercially  
5 available, to Mac's point, for the type of  
6 application we need. We certainly need to do  
7 a little more digging on that.

8 CHAIR STONE: Jay, did you have  
9 your hand up?

10 MEMBER FELDMAN: Thank you. I  
11 have two points to make. One is I know it's  
12 really important to understand these materials  
13 in the context of how they're regulated in  
14 other environments such as the FDA. And  
15 understanding that something is GRAS listed  
16 they're generally recognized as safe at FDA is  
17 certainly part of the deliberations.

18 But I think we should be careful  
19 as a Board to reference GRAS as if it equates  
20 with the standards of the Organic Foods  
21 Production Act. And I see that creeping into  
22 a lot of the documents.

1                   If we want to reference GRAS we  
2                   should be very specific, I believe, as to how  
3                   that review -- because there are a variety of  
4                   reviews under that GRAS listing -- how that  
5                   specific review relates to the OFPA standards.  
6                   And that's going to be important down the road  
7                   as -- and has been important in different  
8                   conversations.

9                   The other issue I think we have to  
10                  look at is given this being used as a vitamin  
11                  and it's -- this is in the minority position,  
12                  actually.

13                  Usually, when we're looking at  
14                  vitamins for terrestrial animals they're --  
15                  well, in the case of vitamins for terrestrial  
16                  animals they're restricted to enrichment or  
17                  fortification when FDA approved.

18                  And so I guess the question is  
19                  whether that is the case in this case. Are we  
20                  talking about -- are we being consistent with  
21                  vitamins that are listed for terrestrial  
22                  animals? And are we restricting it in the

1 same way that we've restricted it for  
2 terrestrial use.

3 So, those are my two comments.

4 Thank you.

5 CHAIR STONE: Thank you, Jay.

6 Calvin?

7 SECRETARY WALKER: Jay, that  
8 comment was also echoed by some of the written  
9 commenters because we did not do that. To use  
10 it with the same annotation when only for  
11 enrichment. So that's something we would have  
12 to look at for sure.

13 CHAIR STONE: Okay. Madam Chair,  
14 we're a few minutes ahead of a scheduled  
15 break. If we can get one more done we're  
16 almost halfway your agenda for the morning.  
17 So maybe we can add one more and then we'll  
18 take a break.

19 MEMBER FAVRE: All right, thank  
20 you. Next on the agenda is a petition for  
21 aquaculture minerals for aquatic animals.  
22 Francis, I believe you're the lead on that.

1 Lisa?

2 DR. BRINES: Thanks, Tracy. The  
3 petition for minerals to be used in aquatic  
4 animal production was submitted on March 27,  
5 2012 by the Aquaculture Working Group.

6 In support of its review the  
7 Livestock Subcommittee did specifically  
8 request a technical evaluation report for  
9 minerals to address the petition. That report  
10 was completed in 2013 and is posted on the NOP  
11 website.

12 There is an analogous listing for  
13 minerals on Section 205.603 of the National  
14 List under paragraph (d) as feed additives,  
15 subparagraph (2) for trace minerals. Thanks.

16 MEMBER FAVRE: Francis?

17 MEMBER THICKE: One thing we did  
18 is that we recognized the trace mineral  
19 element that Lisa mentioned really actually in  
20 practice includes all minerals, macro minerals  
21 as well.

22 Generally trace minerals to animal

1 scientists and cell scientists means a certain  
2 group of them. It doesn't include the macro  
3 mineral. So anyway, we changed the  
4 nomenclature to "minerals" instead of "trace  
5 minerals" first of all.

6 And then secondly we just kind of  
7 put it parallel to with livestock production  
8 already in the existing rules and allowed for  
9 minerals that are essential for animals  
10 basically. I don't know, I don't have any  
11 other comments to make.

12 CHAIR STONE: Comments?  
13 Questions? Other committee members outside?  
14 Zea?

15 MEMBER SONNABEND: I didn't think  
16 I had any questions till Francis just said  
17 that. But what that isn't a trace mineral  
18 might be used as a mineral in fish? Is it  
19 potassium or calcium or what?

20 CHAIR STONE: Francis.

21 MEMBER THICKE: You know, I can't  
22 really answer that but I presume that they

1 need calcium, magnesium, potassium, phosphorus  
2 for their bodybuilding. I guess I made an  
3 assumption there.

4 MEMBER SONNABEND: I mean, it's  
5 not on this list and the list of what was  
6 petitioned with the exception of potassium  
7 iodide which is both potassium and iodide, but  
8 all the rest are truly trace minerals.

9 MEMBER THICKE: You're right. But  
10 when we talked to the working group they  
11 didn't really I think understand. They said  
12 they meant all minerals when they did it and  
13 they were a little unclear of how they ended  
14 up -- they just took the trace mineral  
15 nomenclature out of the existing rule. And so  
16 in our discussions with them they indicated  
17 they meant all minerals. Even though,  
18 actually you're right, they listed only a few.  
19 So it's a little confusing.

20 So we decided that in discussing  
21 with the program and with the working group  
22 that they intended to have all minerals, and

1 that if we didn't have all minerals it wasn't  
2 complete.

3 CHAIR STONE: Very good. Other  
4 thoughts? Colehour?

5 MEMBER BONDERA: I hesitate to  
6 bring this up because I'm guilty of it as  
7 well, but process-wise I'm a little bit  
8 concerned that we're not each -- when each  
9 lead person is presenting these reviewing what  
10 public comment has come in and discussing that  
11 as part of the presentation of the topic.

12 I would like us to try to do so  
13 just because that's been very useful for me as  
14 an NOSB member.

15 I do have a separate point I want  
16 to ask. I don't know if, Francis, you want to  
17 address that.

18 MEMBER THICKE: Are you referring  
19 to particular public comments? Were you  
20 referring to specific public comments? I'm  
21 not prepared. I don't have them reviewed in  
22 front of me. I'm sorry.

1                   MEMBER BONDERA: My experience is  
2                   just at least a general commentary on what the  
3                   public comment was is good for other members  
4                   to contemplate the topic.

5                   MEMBER THICKE: Good point, but  
6                   I'm not prepared to do that. Sorry.

7                   CHAIR STONE: Just for  
8                   clarification so Tony can follow the  
9                   transcripts. I like the fast nature of back  
10                  and forth conversation but it does sort of  
11                  need to route just to be sure the transcripts  
12                  are clear later. Although it makes more sense  
13                  for people to have a conversation.

14                  I've got Tracy and then Calvin.

15                  MEMBER FAVRE: Colehour, I think  
16                  that's a good point. I re-reviewed the public  
17                  comments for livestock last night and in  
18                  general there were a few comments that spoke  
19                  specifically to individual materials. And as  
20                  we come to them hopefully those will be  
21                  brought up.

22                  But I'd say that in general most

1 of the comments were along the lines of don't  
2 do it. We have no standards.

3 CHAIR STONE: Calvin?

4 SECRETARY WALKER: In addition to  
5 what Tracy just mentioned in the presentation  
6 on vitamins I did summarize all of the public  
7 comment and it was along the line of what  
8 Tracy mentioned. And I do have the numbers  
9 and it will be shared.

10 CHAIR STONE: Zea?

11 MEMBER SONNABEND: Well, in light  
12 of the last little bit of discussion I do  
13 respectfully request that if this is going  
14 back to committee that there be a list or  
15 characterization of what type of minerals are  
16 being voted on in the motion.

17 Because I thought I was prepared  
18 to vote for this at least for ponds but now  
19 I'm very uncomfortable with what might be in  
20 that list of minerals for fish. Thank you.

21 CHAIR STONE: And I assume other  
22 aquatic creatures as well.

1                   MEMBER SONNABEND: Well, for  
2 plants we'd need to stick to only trace  
3 minerals as defined in the statute for crops  
4 I think.

5                   CHAIR STONE: Right, but  
6 crustaceans and shellfish and other types.  
7 Jay and then Francis.

8                   MEMBER FELDMAN: I believe we did  
9 receive a comment about needing more  
10 specificity on minerals. I think that came in  
11 if I'm not mistaken from Oregon Tilth.

12                   But in any event, I know that I  
13 wanted to reference on the specificity issue  
14 under 6517(b) of OFPA it says, "The list  
15 established under Subsection (a) of this  
16 section shall contain an itemization by  
17 specific use or application of each synthetic  
18 substance permitted under Subsection (c)(1) of  
19 this section."

20                   So I guess that would provide more  
21 basis for more specificity given a use pattern  
22 or specific need being addressed. That seems

1 to be something we might want to do when we go  
2 back to the subcommittee.

3 CHAIR STONE: Francis?

4 MEMBER THICKE: So Jay, are you  
5 suggesting that in the annotation it should  
6 list all of the essential elements for  
7 animals?

8 CHAIR STONE: Jay?

9 MEMBER FELDMAN: Thank you. Well,  
10 you know, if we get down to the species and  
11 what is needed if there's any unique -- if  
12 there's any uniqueness associated with the  
13 need for these materials on a routine basis,  
14 yes, I think we should list them and identify  
15 -- hopefully identify the specific species in  
16 which they are being used.

17 CHAIR STONE: Francis?

18 MEMBER THICKE: We could do that.  
19 It would be very complicated when you're  
20 getting down to the level of species. But I'd  
21 refer back to the crop production listing for  
22 minerals. It says trace minerals used for

1 enrichment for fortification when FDA  
2 approved.

3 So, if you were to list the 18  
4 essential elements and then try to do it by  
5 species it would get pretty complicated.

6 MEMBER FELDMAN: Well, I guess the  
7 question here is the distinction between trace  
8 minerals and minerals. Okay, so that would be  
9 one distinction that's being made.

10 And if we're making the case for  
11 routine use as opposed to a more specific use  
12 as needed or given a specific use pattern I  
13 think that would be helpful.

14 But certainly the distinction  
15 between trace minerals and synthetic minerals  
16 would be helpful.

17 But in the case of listing the,  
18 you know, I know when we dealt with micro  
19 nutrients in the past at least from a crops  
20 perspective we've identified the specific use  
21 and need and been very specific about that.  
22 So I think it would be helpful to list -- at

1 least provide the list and differentiate  
2 between the trace minerals and the synthetic  
3 minerals.

4 CHAIR STONE: Francis, do you all  
5 want to take this outside?

6 MEMBER THICKE: No, no, no. I'm  
7 not arguing with you, Jay. It's just that I'm  
8 trying to get clarity here.

9 I understand that in the plant  
10 side where it's just trace minerals. It gets  
11 complicated because then we think about if we  
12 have a true aquaculture system where there are  
13 plants and animals together, and we have a  
14 real, true multitrophic system we perhaps  
15 don't need to use trace minerals for the plant  
16 side.

17 On the animal side we probably  
18 still do need to, as we do in terrestrial  
19 animals. So we can discuss it later I guess.

20 MEMBER FELDMAN: Yes. This goes  
21 to the larger issue of routine use and routine  
22 dependency outside of a system. So I think

1 that's where the complication comes in.

2 Because when we look at some of  
3 these things we might be able to provide them  
4 from natural sources depending on the system  
5 that's available.

6 CHAIR STONE: And I don't want to  
7 make light of that. It's very good. That's  
8 exactly what the committee is looking for in  
9 this conversation. So, Harold?

10 MEMBER AUSTIN: I think one  
11 approach to take though would be similar to  
12 crops, Jay.

13 I think it would be part of the  
14 organic systems plan. And it would have to be  
15 a validation justification for the use. And  
16 the producer would have to take and be able to  
17 show that in some way, shape, or form that  
18 there is a need. And it would be a part of  
19 their organic systems plan. And then for  
20 review at their annual review and audit.

21 So I think the mechanism is in  
22 place to be able to justify that and prove

1 that. But that would be something I think as  
2 we look at rulemaking and we come up with  
3 those guidelines I think that would definitely  
4 be something to make sure that that's a part  
5 of. To give us that balance, Jay, that we're  
6 looking for.

7 CHAIR STONE: Okay, thank you.  
8 That was I think a very rewarding conversation  
9 we've had this morning, Madam Chair. Exactly  
10 what I think the committee is looking for.

11 I've got 10:40. Maybe we'll come  
12 back at 10 -- let's come back at 11. Thank  
13 you very much.

14 (Whereupon, the foregoing matter  
15 went off the record at 10:40 a.m. and went  
16 back on the record at 11:02 a.m.)

17 SECRETARY WALKER: Thank you,  
18 Madam Chair. They say why be a copy when you  
19 can be an original so I'm doing a little  
20 PowerPoint here. And for the audience and  
21 Board members of the material that the public  
22 has seen is a part of the PowerPoint

1 presentation.

2 And also I have the subcommittee  
3 listed but it's also, it may be a conflict of  
4 interest for maybe financial gain. Miles is  
5 not here. Because when I get back to work,  
6 when they start talking about merit pay and  
7 what have you been doing I could add these  
8 documents to show that my name was on the  
9 presentation. So it does have a cache.

10 I think Dave Willis mentioned  
11 yesterday the word "cache." It could have  
12 that benefit for me in the next one or two  
13 years.

14 Okay, next as Dr. Brines has read  
15 -- sorry about the small print. This went out  
16 to the public by way of summary of the  
17 proposed action. Essentially it said that  
18 synthetic vitamins is already on the National  
19 List. It's listed at OFPA 6517(c)(1)(B)(i).

20 There was a TR requested and the  
21 Livestock Subcommittee did get a TR for  
22 aquatic vitamins. Essentially the evaluation

1 criteria, the committee at that point in time  
2 we thought that it met the criteria. It did  
3 meet the criteria of impact on humans and the  
4 environment. And I'll show you the public  
5 comment where they had a lot of concerns based  
6 upon how we evaluated aquaculture vitamins for  
7 animals.

8 Essentiality, we checked it yes.  
9 And compatibility and consistency, yes.

10 In terms of the subcommittee's  
11 vote as Colehour was asking as it relates to  
12 this the vote, everyone on the committee voted  
13 to move the aquaculture vitamin petition  
14 forward to the public. And for the  
15 classification motion there was 15 vitamins  
16 that was petitioned by the Aquaculture Working  
17 Group. And no annotations.

18 And it will be mentioned later on  
19 that some of the commenters as Jay mentioned  
20 wanted to see an annotation. Even with  
21 terrestrials there is an annotation for  
22 enrichment so we did not have that. So some

1 of the commenters wanted to see that.

2 Okay. If we can get to general  
3 public comments. During the time that I was  
4 -- based on my count in the fall of 2013 we  
5 had seven commenters, 29 percent approved what  
6 was put forward as it relates to aquaculture  
7 vitamins.

8 In the spring of 2014 there were  
9 79 commenters. Only 3 percent approved. And  
10 it doesn't take a lot to do the math. If you  
11 multiply 3 percent times 79 you can see that  
12 there was only a few that actually support it,  
13 what was put forward.

14 And it was primarily the  
15 Aquaculture Working Group that supported the  
16 petition.

17 I have a little asterisk at the  
18 bottom for those of you like me who can barely  
19 see sometimes is that Food and Water Watch had  
20 over 11,000 signatures. The only state that  
21 I did not see was North Dakota. And it was 10  
22 countries.

1                   Next slide relates to public  
2                   comments. Came in from a citizen from  
3                   Washington. It was Anne. She gave an  
4                   excellent presentation on yesterday. But we  
5                   were told during the training about how not to  
6                   mention the names. So I just unveiled her.  
7                   Her name was Anne I think from Bellingham,  
8                   Washington. She was the one that had the  
9                   commercial fish operation.

10                   Someone from New York, MOSA,  
11                   MOFGA. Sero Kolawa from Hawaii voiced  
12                   opposition. Tennessee, North Carolina,  
13                   Limburg, Belgium, you name it. Also, Oregon  
14                   Tilth supported the vitamins but they wanted  
15                   to see it similar with the annotation as in  
16                   terrestrials. When FDA approved an  
17                   annotation.

18                   What I thought was more for lack  
19                   of a better word is, again it is very rare  
20                   since I've been on the Board to have  
21                   Cornucopia, Center for Food Safety, Organic  
22                   Trade Association, Food and Water Works,

1 Beyond Pesticides, PCC Markets and others all  
2 on the same page. So, when you get all on the  
3 same page it kind of gives you pause to say  
4 that something is wrong.

5 And when I was at Oregon State my  
6 advisor Dr. England said that he never made  
7 errors, he made mistakes. And then Robert  
8 Kennedy said a mistake is not a mistake until  
9 you refuse to correct it.

10 And the message that seemed to be  
11 with the public is that we need to take these  
12 back, take this back and address some of the  
13 concerns. Even Zea had mentioned about are  
14 these for closed, are these for net pens.

15 And these were some of the things  
16 that we briefly had mentioned in the Livestock  
17 Subcommittee but we didn't ferret it out as we  
18 placed it in the document before you.

19 Okay, the next one, about two more  
20 minutes here of public comments. The  
21 Aquaculture Working Group supported vitamins  
22 for animal adequacy.

1                   Organic Trade Association gave  
2                   four reasons to take it back. One was they  
3                   supported tabling vitamins recommendations  
4                   until the proposed rule is out.

5                   The question of essentiality  
6                   cannot be evaluated outside the context of  
7                   production standards.

8                   The third reason, material  
9                   evaluation for the National List cannot occur  
10                  in a vacuum.

11                  And then the fourth reason for  
12                  bringing these back to the committee was the  
13                  need for annotation for specific restrictions  
14                  on materials.

15                  Food and Water Watch, basically  
16                  the same. There's no rule so these should be  
17                  pulled back.

18                  Anne from Washington again said  
19                  that -- do not contribute to the demise of the  
20                  integrity of the U.S. organic standards and  
21                  reputation by bringing these forth within the  
22                  absence of the rule.

1                   And she also expressed concerns  
2 about biodiversity and environmental impact.

3                   And one particular person -- she  
4 also stated this which said by draining the  
5 Southeast Pacific oceans of wild fish for feed  
6 salmon farmers are stealing fish out of the  
7 mouth of Latin American people.

8                   Beyond Pesticides, the same  
9 reason. Essentiality cannot be addressed  
10 without standards.

11                  Also, the concern of open versus  
12 closed systems needed to be defined, et  
13 cetera. And we can go on and on.

14                  Consumers Union expressed some of  
15 the same things. And they also went to say  
16 that the 100 percent organic feed should be  
17 required for carnivore fish and migratory  
18 fish.

19                  Also, Consumers Union stated that  
20 NOSB should consider certain recommendations  
21 such as open ocean systems should be  
22 prohibited. Wild-caught fish for feed meal

1 and fishmeal should also be prohibited.

2 Oregon Tilth recommended using the  
3 same annotation that we use for terrestrial  
4 animals. Vitamins used for enrichment and  
5 fortification when FDA approved.

6 MOFGA, Maine Organic Farmers and  
7 Gardeners Association, essentially said the  
8 same thing.

9 National Organic Coalition, same  
10 thing.

11 And essentially the National  
12 Organic Coalition says that for various  
13 systems we need to have a definition of what  
14 a closed system is.

15 Center for Food Safety outlined  
16 what a closed system should look like. One  
17 hundred percent feed. And they even suggested  
18 using a closed system land base as a  
19 demonstration to see if it works before we go  
20 forward.

21 And their concern was also about  
22 as one guy in Louisiana asked me, he said Doc,

1 he said what's the difference between tilapia  
2 organic in a net pen versus tilapia outside of  
3 the pen.

4 You know, it took me awhile to  
5 fumble through an answer but basically I had  
6 to tell him it was basically feed. So, even  
7 those who may not really understand organic as  
8 we might, we have to make sure that these  
9 definitions for closed and open systems are  
10 clear.

11 Madam Chairman that's in a  
12 nutshell what we have.

13 MEMBER FAVRE: Thank you, Calvin.

14 CHAIR STONE: Are there some  
15 specific input that Board members would like  
16 to give to Calvin as the lead on this material  
17 and the subcommittee in general? Harold?

18 MEMBER AUSTIN: Yes, thanks Mac.  
19 Calvin, just a point of clarification. On the  
20 classification motion you've got the list of  
21 the vitamins and stuff.

22 Tocopherols, CAS 59-02-9. What's

1 the difference between here and the ones that  
2 we discussed previously before taking a break?

3 SECRETARY WALKER: My answer would  
4 be they should be the same. Anybody else have  
5 any? Which is vitamin E.

6 MEMBER FAVRE: It's the  
7 application of the tocopherols are slightly  
8 different in the petitioned use when they were  
9 petitioned separately.

10 CHAIR STONE: Correct. One was  
11 for fishmeal stabilization, feed  
12 stabilization. The other was for feeding the  
13 animal as we understood that. But thank you,  
14 Harold.

15 Other questions, comments? Jean?

16 MEMBER RICHARDSON: Mine's sort of  
17 a question to staff if it would be helpful to  
18 have Calvin's analysis of the consumer  
19 comments to be part of your transcript.  
20 Because otherwise he read some of them in but  
21 not all of them and he has quite a lot of  
22 useful detail there. And rather than us all

1 take time to do it.

2 I did a somewhat similar analysis  
3 but his looks much better than mine did. I  
4 was just wondering if that would be helpful to  
5 you to have that as you go forward out of this  
6 meeting or if it's okay just the way it was  
7 done?

8 CHAIR STONE: We can have the  
9 PowerPoint and Calvin's notes as part of the  
10 record for our deliberation today.

11 DR. BAILEY: I'm sorry, we were  
12 talking. What did you say, Mac?

13 CHAIR STONE: Just Jean wanted to  
14 make sure that we captured the public  
15 comments. And I say that we could incorporate  
16 his presentation as to part of our  
17 documentation of this conversation.

18 DR. BAILEY: Sure, yes, that's  
19 fine. Those kinds of comments will be most  
20 important to the staff once you actually are  
21 voting on any kind of proposal and giving us  
22 a recommendation. But sure, that sounds fine.

1                   CHAIR STONE:  But so yes, Jean,  
2                   you don't need to repeat that when we come  
3                   back around.  Other specific comments to the  
4                   material or overarching kind of thoughts?  
5                   Jay?

6                   MEMBER FELDMAN:  Yes, under the  
7                   overarching.  And you just mentioned it,  
8                   Calvin.  Thank you very much for that thorough  
9                   presentation, by the way, and collating all  
10                  those opinions and input to the Board.

11                  You mentioned in your response to  
12                  the student what's the difference.  And you  
13                  said feed.  And that got me thinking back to  
14                  some of the comments we've received about the  
15                  organic law supporting natural behavior of  
16                  animals.

17                  Does the -- I know we've talked  
18                  about different systems, but it seems to me,  
19                  and I'd be curious if anybody has a different  
20                  opinion on this, that one of the screens that  
21                  the Board should apply when it looks at these  
22                  inputs is natural behavior of the animal, and

1       whether that material would be necessary or  
2       essential to the animal in its natural  
3       environment.

4                   And how does that apply to these  
5       individual materials as we presumably send  
6       these things back to the subcommittee and then  
7       evaluate them.  So that's an overarching  
8       question I think that could be applied to all  
9       these things.  But it's something that came up  
10      in the testimony that we received over the  
11      last couple of days.

12                   CHAIR STONE:  John?

13                   VICE CHAIR FOSTER:  I think that's  
14      a good idea.  The challenge is defining a  
15      natural environment for animals and plants for  
16      that matter that have been bred for several  
17      thousand years in many cases.  That's an  
18      interesting, as those who know me know this is  
19      a topic of some interest for me, like how we  
20      define that is also important.

21                   I think it's a really good point  
22      and a good direction but what constitutes

1 natural in agriculture is -- that can be a  
2 difficult thing.

3 MEMBER FELDMAN: And in this case  
4 I'd qualify that. I meant natural behavior.  
5 And I understand that behavior can be bred as  
6 well.

7 CHAIR STONE: Okay. Others? And  
8 this was clearly -- was this a clearly defined  
9 list of vitamins in the petition is the  
10 question I had. I don't know this one or one  
11 of -- this one was clearly defined? Very  
12 good.

13 Anything else? Very good. The  
14 break didn't put the brakes on the ship moving  
15 across the sea as they say. So, very good.  
16 I think that's it, Madam Chair.

17 MEMBER FAVRE: Okay. Thank you,  
18 Calvin. Thank you, everyone, for your  
19 comments.

20 The next proposal is a petition  
21 for aquaculture biologics vaccine for aquatic  
22 animals. Jean is the lead on that. Lisa?

1 DR. BRINES: Thanks, Tracy. The  
2 petition for biologics vaccines was submitted  
3 on June 12, 2012 by the Aquaculture Working  
4 Group.

5 The petition requests the  
6 inclusion of vaccines to the National List for  
7 aquatic animal production.

8 In support of its review the  
9 Livestock Subcommittee did request the  
10 development of a third party technical  
11 evaluation report. That report was completed  
12 in early 2014 and is posted on the NOP  
13 website.

14 There is one analogous listing for  
15 biologics vaccines on the National List at  
16 Section 205.603 for organic livestock  
17 production under paragraph (a)(4). Thanks.

18 MEMBER FAVRE: Jean?

19 MEMBER RICHARDSON: Thank you.

20 The petitioner requests vaccines including  
21 vaccines made with excluded methods for  
22 medical treatment of aquatic animals.

1                    Obviously when we worked through  
2                    this we would not at any point be proposing  
3                    vaccines made with excluded methods. So the  
4                    vote that we would -- our recommendation that  
5                    we came up with was that it would be -- we  
6                    would propose to approve vaccines except for  
7                    those produced by excluded methods.

8                    The petitioner used somewhat  
9                    similar kind of language to suggest that  
10                   because vaccines are approved for livestock,  
11                   land-based livestock it would be the same  
12                   kinds of approach for vaccines that would be  
13                   used under aquatic conditions.

14                   The products containing biologics  
15                   are regulated through USDA Center for  
16                   Veterinary Biologics. So, they provided us  
17                   information on that.

18                   They explained how the vaccines  
19                   would be given, injected intramuscularly or  
20                   orally and to the fish. Primarily finfish  
21                   would be receiving these. The technical  
22                   report differentiated clearly between

1       inactivated and modified live vaccines. And  
2       believed that they would be significant to  
3       have these, very important because of the  
4       conditions under which the animals would be  
5       being produced. Although there was a lack of  
6       specificity on exactly what that would be.

7                   Internationally vaccines are  
8       allowed in aquaculture in the United Kingdom,  
9       Canada, Japan, Sweden, except for GMO  
10      vaccines. The European Union allows GMO  
11      vaccines in aquaculture as an exception to  
12      their rule.

13                   The vote to move this forward, the  
14      listing motion was that they are synthetic --  
15      one person was absent. There were six yeses,  
16      no nos, no abstentions, no recusals. The  
17      listing motion to move it forward was five  
18      yes, one no, one absent, no abstentions and no  
19      recusals.

20                   The public comments that were  
21      received on this were very much -- my analysis  
22      was very, very similar to that of Calvin's so

1 I won't repeat it here.

2 I would say that there were a  
3 range of organizations and certifiers that put  
4 in comments including Beyond Pesticides,  
5 MOFGA, OTCO that had some comments also on  
6 CO2.

7 There were 68 individuals that  
8 provided information and many of the  
9 organizations had a large following of people  
10 who obviously were involved in providing those  
11 organizations with comments.

12 I should say that the comments  
13 lacked specificity as to materials. So that's  
14 why we're really just getting general  
15 comments. They were -- except for chlorine  
16 and CO2. They all related to the lack of  
17 standards so they were all rather general in  
18 nature.

19 We also have one minority opinion  
20 from Colehour on this subject. And Madam  
21 Chair, I'm not sure if this is the appropriate  
22 time to have Colehour want to make your

1 comments at this time because you had some  
2 serious concerns about allowing this to go  
3 forward. Thank you.

4 MEMBER FAVRE: Yes, Colehour, I'd  
5 suggest you might want to raise them here.

6 CHAIR STONE: Colehour?

7 MEMBER BONDERA: Thank you. Yes,  
8 I think that I would like to repeat some of  
9 what I did -- what is shared. And I think  
10 that generally speaking in terms of the  
11 listing motion, you know, it's from my  
12 personal experience and background critical  
13 that the annotation was included regarding  
14 accepting those with excluded methods. Just  
15 for the record I wanted to note that.

16 I think that the one thing that  
17 I'll spend the few moments focusing on is I  
18 think that the clarity of the checklist in  
19 terms of the information provided in the  
20 comments and documentation and like Lisa told  
21 us when we asked the program or the program  
22 commented about the checklist process, it kind

1 of doesn't matter whether or not the answer  
2 chosen is yes or no. What matters is the  
3 comments.

4 And I would actually agree that  
5 it's very nice that the comments are pretty  
6 thorough and are there. However, I think that  
7 it's misleading in a number of cases that the  
8 no column is chosen when the comments if you  
9 read them essentially suggest that yes, I  
10 think that the probability of environmental  
11 contamination during use or misuse really  
12 suggests that that is a yes answer is one  
13 example. And I think that there's a number  
14 more that are similar to that.

15 I think the one question, category  
16 1, number 9, "Are there adverse biological and  
17 chemical interactions in the agro-ecosystem"  
18 really suggests that maybe we're lacking  
19 sufficient information to decide that the  
20 answer is no.

21 So, I think that my general sense  
22 is, and I very much do not mean this as a

1 commentary to Jean who has put so much work  
2 into these vaccines in the last several years  
3 in terms of getting up to speed and  
4 understanding it.

5 But I just think that we are -- I  
6 think my general sense is maybe that the  
7 information isn't well enough rounded and/or  
8 the presentation of it is not as clear as it  
9 could be. And I think that that's really the  
10 main motivation I had in that regard to come  
11 up with my minority thoughts to make sure that  
12 the broader picture is there.

13 So that's all I wanted to share.  
14 Thank you.

15 CHAIR STONE: Okay. Thank you,  
16 Colehour, not just for that but for  
17 incorporating that into the written materials.  
18 Zea?

19 MEMBER SONNABEND: Thank you, Mac.  
20 I have two very specific questions about this  
21 which means that I guess I'm glad we're  
22 sending it back because granted this may not

1 be me reading the TR very thoroughly. I did,  
2 I confess, rather skim through it and didn't  
3 look up the citations like I do in a lot of  
4 the TRs.

5 But my two specific questions are  
6 this. And this is one that I think would  
7 benefit the most from standards being out  
8 before we look at it.

9 It mentions in a general way that  
10 overcrowding contributes to the need for the  
11 vaccinations. And -- but not -- I didn't see  
12 any specific information on the relationship  
13 between stocking density and the need for  
14 vaccinations.

15 And I don't know if there's going  
16 to be stocking density provisions in the  
17 standards. And so that would be a question I  
18 would have is if there is any specific  
19 research on the relationship between stocking  
20 density, overcrowding and the need for  
21 vaccinations.

22 The second point is that I would

1 really want to know what happened if you  
2 vaccinated fish in a net pen and one of them  
3 escaped, whether that fish would have a  
4 competitive advantage over the wild fish in  
5 the ocean because it was so vaccinated and  
6 more healthy.

7 So this would be another reason I  
8 would feel like I couldn't vote for it in a  
9 net pen until that question was explored.

10 Thank you.

11 CHAIR STONE: Thank you, Zea.  
12 Jean?

13 MEMBER RICHARDSON: I can sort of  
14 answer the questions in part. Some of it was  
15 in the TR but the TR would not specifically  
16 answer your question.

17 But when we talk to people on our  
18 conference calls and also when we made that  
19 field visit that we did to Maine and discussed  
20 with the aquaculture experts there how they  
21 were actually doing vaccines they don't  
22 necessarily prophylactically do vaccinations.

1 It varies enormously from species to species.  
2 And again, they were not listed separately  
3 species by species of finfish in the TR.

4 But the use of the vaccines really  
5 does vary enormously as to how they're used.  
6 For many of them no vaccine is given until it  
7 looks like there may be a problem. And so  
8 then they would be given in order to protect  
9 that immediate flock at the time.

10 And I don't have an answer to your  
11 second question is does a vaccinated fish  
12 getting out be at a competitive edge. I don't  
13 have an answer to that.

14 Certainly there's a lot of  
15 difference between whether or not they're  
16 dealing with killed or not killed vaccines  
17 that are being administered to the fish.

18 I think one of the other issues  
19 for the fish in terms of fish humane treatment  
20 is the extent to which they're being given  
21 things like the equivalent of lidocaine  
22 procaine or stunned in order so that they

1 don't get upset when they get vaccinated.  
2 There's a whole range of other issues I think  
3 that we could have -- we'll need greater  
4 specificity on which hopefully will come out  
5 when we get the standards.

6 CHAIR STONE: Other suggestions,  
7 thoughts for Jean as the lead and the  
8 subcommittee in general to discuss around the  
9 vaccines? Jennifer?

10 MEMBER TAYLOR: Thank you. Can  
11 you tell me if you're able to look at  
12 different kinds of alternative systems that  
13 may lower the need for vaccinations or any of  
14 the other strategies that we're looking for?

15 As you're looking at systems and  
16 developing a protocol maybe you can look at  
17 alternative management or alternative types of  
18 scenarios that would bring about a system  
19 maybe where vaccinations aren't needed or as  
20 much. Or some of the other protocols that  
21 were looking at it as well.

22 CHAIR STONE: Jean?

1                   MEMBER TAYLOR: I'm probably not -  
2                   - I mean, obviously I'm on a learning curve on  
3                   this as well. My understanding from the way  
4                   in which the standards upon which we were  
5                   basing our discussions were going to be  
6                   similar to the recommendations that went  
7                   forward from the NOSB in those three separate  
8                   recommendations that went into the NOP from  
9                   the foundation for the upcoming regulations.

10                   So that the way to minimize the  
11                   use of vaccines is to have extremely low  
12                   stocking densities and also to incorporate a  
13                   range of other fish species and plant species  
14                   that would somewhat assimilate a more natural  
15                   living condition.

16                   But there would be, for example,  
17                   if they're in net pens out in the ocean there  
18                   would be an interior net pen in which the fish  
19                   species that was being raised would be  
20                   located. And then maybe other fish species  
21                   within that.

22                   And in an outer sort of circle

1 around it in another sort of external net as  
2 well other fish species and plant species that  
3 would assimilate to some extent the natural  
4 ecological conditions of the area so that the  
5 overuse of vaccines wouldn't take place.

6 But the assumption is that there's  
7 for some fish species that preventive vaccines  
8 may still be necessary nonetheless.

9 But vaccines are expensive,  
10 difficult, fiddly to do, dangerous sometimes  
11 to the person giving the vaccine because  
12 they're literally, they're vaccinated. You  
13 know, you handle the fish and you put the  
14 needle into it. So if they can avoid that  
15 they're obviously going to do so.

16 The other things in terms of  
17 systems within which we made this conversation  
18 was the assumption that there would indeed be  
19 rotational grazing of the net pens.

20 The net pens would be left fallow  
21 for -- used for one cropping season and then  
22 those net pens, both the interior and the

1 exterior, but sort of the interior ones would  
2 be emptied out.

3 There would be no fish in there  
4 and that those areas would be left fallow for  
5 a period of time. Whether that was 9 months  
6 or 3 years would again vary depending on the  
7 geographical location of the net pens and that  
8 that would allow for recovery of the local  
9 benthic environment prior to restocking again.

10 So yes, I think that you make a  
11 very good point, that there are management  
12 activities that could take place that would  
13 reduce the need for an excessive use of  
14 vaccines. Thank you.

15 CHAIR STONE: Anything else from  
16 the Board? All right, thank you very much.  
17 Madam Chair, next one?

18 MEMBER FAVRE: Sorry, I was making  
19 notes about things to include.

20 CHAIR STONE: Take your time.

21 MEMBER FAVRE: Next on the agenda  
22 is we are now getting into the aquatic plants

1 petition material. Next on the agenda is a  
2 petition for -- aquaculture micronutrients for  
3 aquatic plants. And Francis, you're the lead  
4 on that

5 CHAIR STONE: Lisa?

6 DR. BRINES: We're starting with  
7 micronutrients?

8 CHAIR STONE: Yes.

9 DR. BRINES: Okay, sorry. The  
10 petition for micronutrients was submitted on  
11 June 7, 2012 by the Aquaculture Working Group.  
12 It requests the use of micronutrients in  
13 aquatic plant production.

14 This petition was not on the  
15 agenda for the October meeting so it's a new  
16 item.

17 There is an analogous listing for  
18 micronutrients on the National List for  
19 organic plant production under Section 205.601  
20 of the National List under paragraph (j) as  
21 plant and soil amendments. Thanks.

22 CHAIR STONE: Francis?

1                   MEMBER THICKE: Yes. So the  
2 listing motion includes the annotation for  
3 non-vascular plants only, which means it's not  
4 for hydroponics.

5                   And with that we need to look  
6 ahead. We didn't do that for some of the  
7 other plant aquaculture things and we may need  
8 to have that in there in the future.

9                   The motion passed 7 to zero.  
10 However, there are some controversial issues  
11 in here I think and a lot of it depends upon  
12 the system as it's defined. And we don't have  
13 a standard so we don't know what it is.

14                   But basically this proposal is for  
15 a very simple system where you're supplying  
16 all the nutrients to the plants. And I think  
17 that in the comments, of course most of the  
18 comments that came to this were about not  
19 approving them until we have standards in  
20 place.

21                   But I think Beyond Pesticides  
22 probably articulated very well this issue in

1 that in general in organic production  
2 synthetic materials are not the norm. They  
3 only are there for deficiencies.

4 Like for example, crop production.  
5 You have to have a soil test in order to apply  
6 micronutrients.

7 Well, in a plant aquaculture the  
8 way they are doing it and proposing to do it  
9 is that you put in a media mix that has the  
10 micronutrients in it at the onset.

11 And the rationale for that is that  
12 it's very expensive and difficult to test if  
13 there's a deficiency. So they just put it in  
14 routinely.

15 And that basically you're starting  
16 with water so you're not -- unlike soil you're  
17 not going to normally have them in there. So  
18 that I think is the real issue.

19 Because if you're looking at, as  
20 Beyond Pesticides is talking about, a  
21 multitrophic system with plants and animals  
22 together the animal aquaculture will supply

1 the nutrients for the plants. And in some  
2 successful systems they do not use any  
3 additional nutrients for the plants.

4 And so if that were the system  
5 that we're defining then what we have here is  
6 not appropriate. However, if it's a simple  
7 system defined by the Aquaculture Working  
8 Group that's what this is kind of targeted  
9 for. So I'd be interested in people's  
10 thoughts on this.

11 MEMBER FAVRE: Thank you, Francis.

12 CHAIR STONE: Questions?  
13 Comments? Thoughts? Nick?

14  
15 MEMBER MARAVELL: This is just a  
16 question because I wasn't part of the  
17 discussion. Is this a proposal only for non-  
18 vascular aquatic plants? And it would ignore  
19 whether or not that was in a multitrophic  
20 system or a system with aquatic animals.

21 MEMBER THICKE: As it's written it  
22 appears it would apply to both a multitrophic

1 system -- it could apply to both and a  
2 monoculture system. A plant like maybe algae  
3 or something.

4 That's the way it is now. And is  
5 that the way the standards are going to be?  
6 Are the standards going to require a  
7 multitrophic system? The Working Group didn't  
8 seem to indicate that that was the direction  
9 they're going in.

10 Is that what you're talking about,  
11 Nick?

12 CHAIR STONE: So, my impression,  
13 and that's all it is is an impression, that  
14 multitrophic systems are very much not only a  
15 requirement of the standards in order to be  
16 organic and to do it. It's the growers want  
17 it to be, they need it to be. It's a critical  
18 point.

19 Some of those may be multiple  
20 saleable crops and some of those may be a  
21 biofilter type of a system that's not a  
22 saleable crop. So to Nick's point there's a

1 couple of layers there that have to be sort of  
2 peeled away to see just what is happening in  
3 there. So, John, do you have something?

4 VICE CHAIR FOSTER: It's been  
5 awhile since these were in the Crops Committee  
6 where I was -- these materials were covered by  
7 the Crops Committee back what seems like a  
8 long time ago now.

9 But my recollection of my  
10 conversations with the Aquaculture Working  
11 Group representatives when I was looking at  
12 these materials was that it was specified --  
13 well, the utility was expected for non-  
14 vascular plants only to generate a food source  
15 for animals.

16 And in that context then I don't  
17 know that it needs to be -- I don't know that  
18 we -- I don't know, that was my recollection  
19 anyway, and that makes sense to me. I would  
20 rather have micronutrients used to feed algae  
21 that were grown onsite kind of locally grown,  
22 locally consumed. I would much rather have

1 that than needing to import some other food  
2 source from offsite at whatever expense.

3 So if the cost of having an  
4 aquatic animal producer be able to provide  
5 some of his or her own feed, if the cost of  
6 that is micronutrients to grow algae that  
7 seems like a really good tradeoff to me,  
8 irrespective of the issues you were talking  
9 about, Francis.

10 CHAIR STONE: Zea?

11 MEMBER SONNABEND: Thank you.

12 Okay. I find this really confusing now  
13 because aquatic plants as far as I know does  
14 not include lettuce and tomatoes grown  
15 hydroponically. And yet terrestrial plants  
16 doesn't either really.

17 And so, but you haven't defined  
18 aquatic plants to say it does. And yet you're  
19 trying to accomplish some ban on hydroponic  
20 crops in an aquatic plant document which --  
21 without exploring that in the checklist near  
22 as I can tell.

1                   And so I could -- I would need  
2 definitions and what is done in hydroponics  
3 now. Because right now hydroponic people are  
4 operating under the 205.601 crop standard.

5                   Before you could really justify  
6 this sufficiently. At very minimum a  
7 definition of an aquatic plant which to me  
8 does not include hydroponics at the moment.

9                   CHAIR STONE: Francis?

10                  MEMBER THICKE: Well, we operated  
11 under the assumption that it was non-vascular  
12 plants throughout. And then we put it in at  
13 the end to make sure.

14                  Because aquatic plants could be  
15 ambiguous. It could mean non-vascular plants.  
16 It could mean a plant like a tomato growing in  
17 water. Somebody may say well, that's an  
18 aquatic plant because it's growing in water.  
19 I mean, that's why we put it in there.

20                  CHAIR STONE: Okay, very good.  
21 You've got your marching orders. Tracy, take  
22 your time with your notes.

1                   MEMBER FAVRE: Thank you for your  
2                   patience.

3                   CHAIR STONE: Absolutely.

4                   MEMBER FAVRE: Okay, no other  
5                   questions on -- we're good? Okay.

6                   Next proposal was a petition for  
7                   aquaculture CO2 for aquatic plants. I was the  
8                   lead on that so the -- I'm sorry, Lisa. Yes,  
9                   thank you.

10                  DR. BRINES: Thanks, Tracy. The  
11                  petition for carbon dioxide for aquatic plant  
12                  use was originally submitted April 3, 2012.  
13                  It was updated after the initial posting on  
14                  the NOP website. So the current update was  
15                  submitted on November 20, 2012.

16                  The petition requests the  
17                  inclusion of carbon dioxide on the National  
18                  List for aquatic plant production.

19                  In support of its review the  
20                  committee did not request a technical  
21                  evaluation report although there are previous  
22                  reports available from 2006 and earlier in

1 consideration of carbon dioxide that was  
2 previously petitioned for a change on  
3 handling.

4 Carbon dioxide is currently  
5 included on the National List for processing  
6 and handling at Section 205.605(b). Thanks.

7 CHAIR STONE: Tracy?

8 MEMBER FAVRE: Okay. So, the  
9 petitioner specifically has requested  
10 synthetic carbon dioxide but has actually made  
11 a statement in the petition that there are  
12 natural sources of carbon dioxide out there.  
13 Clearly there are.

14 The reason for the petition for  
15 synthetic is that geographic availability of  
16 natural carbon dioxide is not reliable. And  
17 likewise, there's not always a good match-up  
18 where the deposits of natural CO2 exist  
19 compared with where potentially they would be  
20 used in aquaculture systems.

21 And they've rightfully pointed out  
22 that transport of CO2 can potentially be

1 dangerous. So that's why they've indicated  
2 that they've specifically petitioned for  
3 synthetic.

4 The purpose of the CO2 in  
5 aquaculture systems is to be used in the  
6 adjustment as a production aid for alkalinity  
7 adjustment and for maintaining pH levels.

8 Basically this is going to be used  
9 for culture of aquatic plants. As those  
10 plants grow, particularly micro algae, the pH  
11 can fluctuate due to the proliferation of the  
12 plant itself. And so the CO2 would be used as  
13 a pH adjustment.

14 The committee passed a motion to  
15 classify carbon dioxide as petitioned as  
16 synthetic, 5 yes, zero no, 2 absent, zero  
17 abstain, zero recusals.

18 The listing motion was to list it  
19 with the following annotation for use in  
20 contained systems such as tanks and ponds.  
21 That motion passed 4 yes, 1 no, 2 absent, zero  
22 abstained, zero recusals.

1                   Looking at the public comment as  
2 with all the other materials and as both  
3 Calvin and Jean have mentioned there was very  
4 little specificity around most of the  
5 materials.

6                   However, there were a couple of  
7 comments around CO2. Beyond Pesticides  
8 particularly made some very good cogent  
9 remarks.

10                  But I will express some  
11 disagreement with the comment that they make  
12 that because the carbon dioxide is consumed as  
13 the algae grows that it's therefore considered  
14 a synthetic micronutrient.

15                  I don't necessarily agree with  
16 that. I think it's a culture adjustment. And  
17 it can be argued probably either way but  
18 that's my personal opinion on it.

19                  This was a tough one. Obviously  
20 as someone sitting on the environmental  
21 position on the Board there are valid reasons  
22 for why CO2 production is problematic.

1                   If we do have the opportunity to  
2                   use the recycled version of CO2 and in most  
3                   cases even the synthetic CO2 is a byproduct of  
4                   manufacturing of other processes. Some of the  
5                   processes are fairly noxious including  
6                   petrochemical processing. But the material  
7                   itself is already produced. So there is some  
8                   mitigation of that in my mind.

9                   Generally, like I said, the  
10                  comments were that none of the materials  
11                  should be approved in absence of standards.  
12                  And there were some particular concerns around  
13                  CO2.

14                 CHAIR STONE: Thank you, Tracy.  
15                  Other Board members, subcommittee members,  
16                  additional comments? Colehour?

17                 MEMBER BONDERA: Yes, thank you,  
18                  and thank you, Tracy. I'll just add a little  
19                  bit of the minority opinion on the subject  
20                  area since I'm the one who voted in opposition  
21                  to listing.

22                 And I think just in summary really

1 the general concept of a major component  
2 that's necessary for aquatic plant growth in  
3 an organic system in the form of a synthetic  
4 chemical is really inconsistent with organic  
5 principles in my opinion.

6 And as is noted in the record, and  
7 I'm not going to read through it, but you  
8 know, the -- this was before it came to the  
9 Livestock Subcommittee considered by the Crop  
10 Subcommittee and there was information that  
11 indicated that additions of synthetic carbon  
12 dioxide are not essential.

13 And finally, really the use of  
14 synthetic carbon dioxide which is not captured  
15 as opposed to using carbon dioxide produced by  
16 animals in the system contributes to, like  
17 Tracy was generally suggesting, to the problem  
18 of global climate change, environmental  
19 questions.

20 So I just think that those points  
21 stand on their own in terms of that this  
22 listing isn't merited in my opinion. Thank

1 you.

2 CHAIR STONE: Tracy?

3 MEMBER FAVRE: I did only want to  
4 add that CO2 is actually currently approved  
5 for use in other international organic  
6 aquaculture systems and does seem to be fairly  
7 innocuous as it's described in those  
8 international systems.

9 CHAIR STONE: Zea?

10 MEMBER SONNABEND: Okay. This is  
11 a subject I know quite a bit about the sources  
12 of CO2 because I did write the petition in  
13 Handling that is referred to extensively in  
14 the Aquaculture Working Group petition.

15 There are two non-synthetic  
16 sources mined from the ground, in deposits  
17 underground, and the byproduct of ethanol  
18 production which is a naturally occurring  
19 biological process of which CO2 is the residue  
20 after the ethanol is produced. There are also  
21 synthetic sources from industry and  
22 manufacturing.

1           I submit that by recapturing the  
2 sources that would ordinarily come out of a  
3 smokestack all you're doing -- that has less  
4 environmental impact than the non-synthetic  
5 sources that you're mining from the ground and  
6 then putting the CO2 in the air because all  
7 you're doing recirculating the first, the  
8 synthetic, whereas the mined you're putting it  
9 in the air originally. So, I just wanted to  
10 make that point clear.

11           You cannot -- if you're a small  
12 consumer of carbon dioxide, and by that I mean  
13 if you're buying less than a railcar full you  
14 cannot find out usually where your source is  
15 coming from. And so producers do not have the  
16 luxury of choosing synthetic or non-synthetic.

17           That being said, I have not been  
18 at all convinced on the need for this material  
19 in algae production based on both written  
20 public comment from Oregon Tilth and from  
21 things that Rahm said in his oral comment and  
22 also when he was on the conference call.

1                   And I think that if it would be  
2 approved a more restrictive annotation than  
3 this would be needed because both of them  
4 seemed to imply that, especially Rahm, that it  
5 was only needed in the very early stages of  
6 growth on algae in tanks and in multitrophic  
7 systems.

8                   But I might have that wrong  
9 because it wasn't really explored in the  
10 checklist. And we did not get a TR on that.  
11 And so the specific uses of what situations  
12 it's used in would lead to being able to make  
13 a better decision.

14                   Because if it's not really needed  
15 in everything, you know, why approve it for  
16 everything. And you know, Tilth's testimony  
17 said they didn't allow it because they found  
18 that all the systems they certify in it's not  
19 necessary.

20                   And so I would like to have a  
21 little more input on that from our  
22 stakeholders before I really would feel

1 comfortable voting for this material.

2 CHAIR STONE: Colehour?

3 MEMBER BONDERA: Thank you. Thank  
4 you, Zea. I just want to add it's not exactly  
5 clarification so I guess it's repetition, but  
6 in the checklist category 2 question, number  
7 8, are there alternative substances.

8 You know, the last sentence reads,  
9 and if you look at the petition it's going to  
10 read, "When aquatic plant production is paired  
11 with animal production the requirement for  
12 additional CO2 is reduced."

13 So I think it goes back to what  
14 Zea was just talking about is the system and  
15 how it's balanced and what is being  
16 incorporated. And what Francis was talking  
17 about, a multitrophic.

18 So I think that there's a lot of  
19 issues here even within where the thing is  
20 currently at in terms of need. Thank you.

21 CHAIR STONE: Jay?

22 MEMBER FELDMAN: Thank you. We

1 worked on this in the Crops Subcommittee as  
2 you know. I think others have mentioned this.  
3 So I'd like to just provide some orientation  
4 on the issues Zea raised related to production  
5 of CO2.

6 But before getting to that I'd  
7 like to just quickly read the comment into the  
8 record from Oregon Tilth which sort of  
9 captures my view on this.

10 The Environmental Protection  
11 Agency has deemed CO2 to be a regulated air  
12 pollutant and greenhouse gas. That's 2014.

13 This proposed allowance, that is  
14 the proposal coming out of the Livestock  
15 Subcommittee for CO2 in crop aquaculture would  
16 open up the doors to regular, not intermittent  
17 use of synthetic CO2 in organic production.

18 Although the petition is  
19 optimistic that recycled CO2 could be used the  
20 primary sources of recycled CO2 are from  
21 industrial waste, flue gas, et cetera, would  
22 contain other contaminants including nitrous

1 oxides and sulfurous oxides.

2 For pure CO2 to be used in aquatic  
3 plant production it is probable that new  
4 synthetic CO2 would need to be produced which  
5 would ultimately add additional greenhouse gas  
6 into the environment.

7 Oregon Tilth believes that the  
8 listing motion "for use in contained systems  
9 such as tanks and ponds" is not sufficient to  
10 prevent the eventual release of new CO2 into  
11 the atmosphere.

12 So this raises the larger, bigger  
13 picture issue. And I guess you could argue  
14 it's philosophical. I think others would  
15 argue it's legal, a legal question as to the  
16 checklist and questions surrounding the  
17 origins of materials, where they come from.

18 Regardless of whether we are  
19 taking a recycled material from an otherwise  
20 polluting industrial process I think at the  
21 end of the day organic has to provide us a  
22 model for not being reliant on polluting

1 industrial practices.

2 I think that's inherent in the  
3 statute, it's the goal of the organic system.  
4 We are more than what we put in our mouths.  
5 We are, as an organic system, as we all know,  
6 really focused on how we protect the Earth,  
7 the land, the management systems that we all  
8 are trying to improve on a day-to-day basis.

9 So this would be a step backwards  
10 in terms of creating a system, calling it  
11 organic and being reliant on an industrial  
12 waste product that we know to be hazardous and  
13 deemed by EPA to be a pollutant greenhouse  
14 gas.

15 I appreciate the perspective that  
16 recycling is good in a society otherwise  
17 dependent on these industrial practices.  
18 However, I think what we're trying to do  
19 through organic and what the law initiates is  
20 a new view of how we create systems that are  
21 not reliant on those practices and show that  
22 these industrial practices can be eliminated

1 because clearly organic is not dependent on  
2 them.

3 So, I know there are a lot of  
4 complex issues in there but I think we have --  
5 at some point may want to have that discussion  
6 in more depth.

7 The other issue that I still don't  
8 have complete clarity on is the nutrient value  
9 of this material, and whether in fact -- I  
10 thought I heard yesterday from Rahm that this  
11 does have nutrient value.

12 And of course if this is a  
13 synthetic and we're not very careful that we  
14 are evaluating that aspect. In fact, the  
15 original petition mentioned the nutrient value  
16 of CO<sub>2</sub>. We went back to the petitioner and  
17 the petitioner corrected that. And so that  
18 was taken out of the petition.

19 But I think if in fact that is  
20 even a secondary effect of this reliance then  
21 we have to know that and evaluate it in the  
22 context of the review. Thank you.

1 CHAIR STONE: Thank you, Jay.

2 John?

3 VICE CHAIR FOSTER: So I hate to  
4 disagree with my former employer at Oregon  
5 Tilth but there's -- there are several  
6 companies not in this room, but who'd find a  
7 whole bunch of food-grade carbon dioxide  
8 readily available that does not have any of  
9 the byproducts that would be problematic. So  
10 I'm hard-pressed to believe that the  
11 relatively minor use that this -- at issue  
12 here would impact the larger multinational  
13 corporations that carbonated beverages on a  
14 regular basis that don't have those pollutants  
15 in them.

16 So I'm puzzled by that. I would  
17 like to know more about that, the details of  
18 that. But, just the carbonated beverage  
19 industry alone tells me there's plenty of  
20 toxin-free CO2 available.

21 So that aside, I don't want to  
22 forget that -- I don't know many farmers that

1 grow or raise anything that use things they  
2 don't really have to. So I wanted to remind  
3 us that as we talk about this I don't think --  
4 I don't think every operator is going to start  
5 using this just because it's on the list.  
6 They'll only use it if they need it.

7 And that's true I think for a lot  
8 of inputs. That certainly was true for me  
9 when I was growing vegetables.

10 Even though the National List has  
11 several things on it never used any of them  
12 unless I absolutely had to just from cost. So  
13 I'd hate to have the dialogue keep going  
14 without reminding ourselves that just because  
15 it's on the list doesn't mean everyone is  
16 going to run out and use it.

17 The wisdom of growers is very,  
18 very deep and their pockets are not. So they  
19 will tend not to use things unless they have  
20 to. I just wanted to remind us of that.

21 CHAIR STONE: Nick?

22 MEMBER MARAVELL: Yes, just a

1 suggestion for the committee. The statement  
2 about carbon dioxide is used internationally  
3 is based on a 2006 report and did not cover as  
4 is indicated here aquaculture standards in the  
5 international community.

6 So if you have the information to  
7 update that standard and whether or not the  
8 sources are synthetic or natural. Just to  
9 see. You know, it's been almost 10 years.  
10 Let's see, maybe they figured this one out.

11 CHAIR STONE: Jay?

12 MEMBER FELDMAN: Yes. John, I  
13 think -- again, I don't want to get off, and  
14 we can have a side conversation on this, but  
15 I think it's important when we talk about  
16 production practices to -- and this is  
17 category 1, question 2, is there environmental  
18 contamination during manufacture, use, misuse,  
19 or disposal. And it's in that context of  
20 manufacture that we're talking about the  
21 release of greenhouse gases and those sorts of  
22 things.

1                   So, I appreciate that, you know,  
2                   organic is a minor player in virtually all  
3                   these discussions of contamination. But our  
4                   hope long-term is that organic becomes the  
5                   major mainstream player.

6                   And if we don't have a good  
7                   foundation in having answered these questions  
8                   early on about the underlying source material  
9                   in their manufacturing processes we will have  
10                  built organic on a foundation that we didn't  
11                  intend to build on which is a foundation of  
12                  industrial practices that are polluting and  
13                  ones that we would like to see discontinued,  
14                  ones that many of our friends in the  
15                  environmental community working on green  
16                  chemistry, alternative practices just as we  
17                  are here are seeking to eliminate.

18                  So let's early on when we approve  
19                  a system like this, something new, that we  
20                  start with a sound foundation and answer all  
21                  these questions really thoroughly.

22                  Look at all the words in the

1 question, not just pick one. Don't pick  
2 "use." Don't pick "disposal." Don't pick  
3 "misuse." Don't just simply pick  
4 "manufacture." Look at all the questions and  
5 answer those questions to the best of our  
6 ability so that we can go out to the community  
7 and say we've created this new system here  
8 that we feel to the best of our ability is  
9 truly compatible with organic principles and  
10 core values.

11 CHAIR STONE: Thank you, Jay.  
12 Francis?

13 MEMBER THICKE: Yes, I'd like to  
14 point to something too that Oregon Tilth said.

15 In the case that the CO2 emissions  
16 from the fish are not enough to keep the pH  
17 right. There are other natural pH adjustments  
18 like lactic acid and vinegar and oyster  
19 shells. So that's reassuring that they're  
20 looking at that.

21 CHAIR STONE: Okay. Madam Chair,  
22 when you get your notes squared away, next up.

1 Do you need another pen or anything over  
2 there?

3 MEMBER FAVRE: I'm going to start  
4 pricking my finger and writing it in blood.  
5 Okay.

6 (Laughter)

7 MEMBER FAVRE: Sorry, TMI? Okay.  
8 Next on the agenda is aquaculture chlorine for  
9 aquatic plants petitioned. Lisa?

10 DR. BRINES: Thanks, Tracy. The  
11 petition for chlorine for aquatic plant use  
12 was received on April 19, 2012. It requests  
13 the inclusion of chlorine materials to the  
14 National List for use in aquatic plant  
15 production.

16 As mentioned earlier there is no  
17 new technical report for chlorine for  
18 aquaculture use. But there were previous  
19 reports available from previous review for  
20 both crops and livestock and handling uses.  
21 And chlorine materials are currently listed on  
22 the National List at 205.601, 205.603 and

1 205.605. Thanks.

2 MEMBER FAVRE: Thank you, Lisa.  
3 Joe, you're the lead on this.

4 MEMBER DICKSON: Thank you, Tracy.  
5 I don't know that there's a lot to say here  
6 that we didn't talk about when we discussed  
7 the aquatic animal use of this material this  
8 morning.

9 There is clearly a lot of work to  
10 do on the checklist for both uses of the  
11 material. And I think we can do a lot of work  
12 to accommodate the concerns that were brought  
13 up this morning and in the minority opinion on  
14 both of them.

15 I think we as a committee have a  
16 chance to work collaboratively with both the  
17 minority and the majority groups on both uses  
18 of this material and come up with something a  
19 little more detailed and I think a little more  
20 robust.

21 There's also the question of  
22 culture water which we talked about a little

1 bit this morning, both philosophically and in  
2 understanding the mechanics of exactly how  
3 that use works, what it looks like, how we  
4 visualize it and understand it.

5 It's a good illustration of I  
6 think where a practice standard would really  
7 come in handy and I think help a lot of people  
8 on this committee feel better about the  
9 material. So again, you know, I think that  
10 does confirm our overall approach to all of  
11 these aquaculture materials.

12 CHAIR STONE: Jay?

13 MEMBER FELDMAN: Thank you for  
14 that, Joe. I look forward to working with you  
15 guys on that.

16 And for anyone reading this  
17 transcript in the year 2020 please refer back  
18 to the discussion on livestock animal  
19 aquaculture because I don't think we need to  
20 repeat the discussion we had this morning as  
21 it relates to crop aquaculture. Thank you.

22 CHAIR STONE: Tracy?

1                   MEMBER FAVRE: I would like to  
2 just say to Jay bless your heart. Thank you  
3 for that.

4                   (Laughter)

5                   CHAIR STONE: Great. Thank you  
6 all. Very good. Tracy, you didn't even have  
7 to take any notes. Very nice.

8                   MEMBER FAVRE: Okay. Well,  
9 actually I did. You missed it. Thank you.

10                   Next on the agenda is a proposal  
11 petitioned aquaculture lignin sulfonate for  
12 aquatic plants. Jean is the lead on that.  
13 Lisa?

14                   DR. BRINES: Thanks, Tracy. The  
15 petition for lignin sulfonate for aquatic  
16 plant production was submitted on June 27,  
17 2012 by the Aquaculture Working Group.

18                   It requests the inclusion of  
19 lignin sulfonate as a chelating agent for  
20 aquatic plant production. In support of its  
21 review there was not a new technical report  
22 but there was a previous technical evaluation

1 report available for lignin sulfonate from  
2 2011 to assist in the subcommittee's  
3 deliberations.

4 One other point on lignin  
5 sulfonate. There were previously two  
6 petitions for lignin sulfonate, one for  
7 aquatic plants and one for aquatic animals.  
8 The petition for lignin sulfonate for aquatic  
9 animals which was as a feed binder was  
10 withdrawn by the petitioner last August.  
11 Thanks.

12 MEMBER FAVRE: Yes, go ahead.

13 MEMBER RICHARDSON: Okay, so  
14 lignin sulfonate, interesting material. The  
15 proposed recommendation for this would be to  
16 use it only for a chelating agent for  
17 micronutrient uptake.

18 Lignin sulfonate presently is used  
19 in organic soil-based crop production as a  
20 plant or soil amendment, as a chelating agent  
21 and as a dust suppressant and also as a  
22 floating agent in post harvest handling at

1 205.601.

2 So the chelating agents are water  
3 soluble compounds which is an important aspect  
4 to keep in mind since we're dealing with  
5 aquatic systems. And they have the ability to  
6 bind metal nutrients.

7 And what they do is they allow --  
8 the chelate molecule facilitates cell uptake  
9 of the metal nutrients which are needed by the  
10 plants in this case.

11 Now, lignin sulfonate is not my  
12 favorite material. It's a byproduct of the  
13 wood and pulping industry, a derivative of  
14 lignin, and it can be made by a number of  
15 different processes: sulfite chemical pulping,  
16 acidic sulfite process and the craft pulping  
17 process.

18 And there has in the past been  
19 some serious concern about the mechanisms  
20 whereby the lignin sulfonate is derived by  
21 then is utilized subsequently in agriculture.  
22 Some of those issues have been laid to rest

1 but again the TR does in fact raise some of  
2 these and the references associated with it  
3 get into quite a reasonable amount of detail.

4 One of the problems with lignin  
5 sulfonate salts, that they're soluble in  
6 water, and these are water plants that we're  
7 looking at. Due to the high biological demand  
8 during breakdown the lignin sulfonates will  
9 remove dissolved oxygen from waters,  
10 decreasing pH and can have a range of impacts  
11 including increasing metal uptake through  
12 bioaccumulation and also to modify  
13 considerably -- the potential is there to  
14 modify considerably the benthic environment.

15 It is with those things in mind  
16 that when the lignin sulfonate, the other  
17 petition which was for use as a fish binder,  
18 fish feed binder, sorry, came to our  
19 subcommittee we spent considerable time  
20 working on that, looking at it within the  
21 context of using the regulations that were --  
22 recommendations that were being proposed by

1 the NOSB for aquatic aquaculture we in our  
2 subcommittee had come up with a decision and  
3 voted to say no to lignin sulfonate being used  
4 as a fish feed binder because of the impact on  
5 the aquatic environment, the benthic  
6 ecosystem, et cetera.

7 And we were proposing that that  
8 was going to go forward to the full Board.  
9 However, the petitioner withdrew that.

10 I mention that because it is  
11 important that we then looked at the use of  
12 the lignin sulfonate within the proposed  
13 systems as far as we could tell that were  
14 going to be used.

15 We made some assumptions based on  
16 the petition and our understanding of what was  
17 going to be proposed from the NOSB  
18 recommendations on aquaculture that the plants  
19 would be in glass flasks such as we saw, those  
20 of us that went to the -- on the NOSB when we  
21 went to -- was it Portland? We went and  
22 looked at the university and we went out and

1 looked at shellfish production.

2 I remember Calvin and Wendy and I  
3 went and looked at how they were producing  
4 these small algae in glass flasks, in  
5 containers, in tanks and in ponds. And they  
6 were not being produced in open water.

7 So for these reasons it appears  
8 absent the detail of the new regulations, and  
9 everything to do with aquaculture depends on  
10 the detail in those regulations that are  
11 upcoming, we made the assumption that the  
12 environmental impact of using the lignin  
13 sulfonate in these kinds of systems could be  
14 expected to be minimal or negligible.

15 Based on those assumptions we  
16 voted, the listing motion, we voted to approve  
17 the lignin sulfonate for a chelating agent.  
18 There were 6 yes, 1 no and abstentions and  
19 recusals were zero.

20 Again, the public comments that  
21 we've talked about earlier were non-specific  
22 to lignin sulfonate, only referred basically

1 to the systems as a whole.

2 So, we're recommending approval.

3 It would be interesting to be able to see what  
4 these -- see what our discussion would look  
5 like once we've received the final regulations  
6 as to how exactly they're going to be used.

7 CHAIR STONE: Okay, Nick?

8 MEMBER MARAVELL: Yes, Jean, I was  
9 interested in the assumption. But it was not  
10 necessary to place that assumption as an  
11 annotation then you didn't feel on the  
12 approval of lignin sulfonate?

13 CHAIR STONE: Jean?

14 MEMBER RICHARDSON: We weren't  
15 getting into annotations. No.

16 CHAIR STONE: Nick. Oh, you're  
17 good? Other thoughts? Jay?

18 MEMBER FELDMAN: Well, you know,  
19 this obviously, as you say, Jean, this was  
20 wrapped up in the larger question of the  
21 system that ultimately is used. And then the  
22 question of essentiality comes up as well.

1 I guess my view of this is similar  
2 to the CO2. As you pointed out, the source of  
3 this material is problematic. And so you  
4 know, again, that's going to have to be  
5 balanced with the essentiality concerns given  
6 the different systems.

7 And I might put a little more  
8 weight than others on the manufacturing  
9 process and origins of the material. But  
10 ultimately I hope that we can have that  
11 discussion, balancing of the essentiality with  
12 the adverse impacts.

13 CHAIR STONE: Colehour?

14 MEMBER BONDERA: Yes, I think what  
15 Jay just said was related to what I wanted to  
16 say. And I'll just add maybe the fact that we  
17 really are being asked to decide about not the  
18 essentiality of those micronutrients for the  
19 plants, but the essentiality of synthetic  
20 micronutrients and the lignin sulfonate is  
21 used to chelate those synthetic  
22 micronutrients. And that's I think the

1 question really is essentiality of that means  
2 to achieve.

3 CHAIR STONE: Jean.

4 MEMBER RICHARDSON: I think those,  
5 Jay and Colehour, are both very valid points.

6 I know that when we looked at the  
7 use of the lignin sulfonate as a feed binder  
8 for fish feed we did note in terms of  
9 essentiality that in fact there were a number  
10 of other materials that could be used to  
11 replace that which was one of the essentiality  
12 issues that we looked at for that.

13 We weren't able to find what might  
14 be used for -- as a chelating agent other than  
15 the lignin sulfonate. There really wasn't  
16 enough information on that. And it would be  
17 good to have it. Because quite frankly it  
18 would be very difficult for me to vote seeing  
19 more lignin sulfonate getting into aquatic  
20 ecosystems of any kind.

21 So unless there's really clear  
22 evidence as we re-review these and look at it

1 within the system hopefully they will find  
2 some other material that could be more  
3 appropriate. Because I would have a hard time  
4 putting more, or any of this really into an  
5 aquatic ecosystem if any of it's getting into  
6 an outside of the tank situation.

7 CHAIR STONE: Francis?

8 MEMBER THICKE: Oregon Tilth made  
9 a good comment related to this lignin  
10 sulfonate and micronutrients.

11 They said if all micronutrient  
12 forms including synthetically chelated ones  
13 are allowed then the petition allowance for  
14 lignin sulfonate as a synthetic chelate  
15 becomes irrelevant.

16 It's an interesting concept. If  
17 you're going to put them in there anyway we  
18 don't really need the lignin sulfonate. Not  
19 that I'm in favor necessarily of putting them  
20 in there anyway.

21 CHAIR STONE: Jay?

22 MEMBER FELDMAN: Jean, I don't

1 know if you got into the detail of the natural  
2 sources of micronutrients that could be added  
3 when the subcommittee discussed essentiality.  
4 But obviously that's a key element in all our  
5 discussions.

6 Do you recall if there was any  
7 discussion of natural sources of  
8 micronutrients?

9 CHAIR STONE: Jean.

10 MEMBER RICHARDSON: That would be  
11 a question to the micronutrient lead person.  
12 I mean this one, right now we're just talking  
13 about the lignin sulfonate.

14 MEMBER FELDMAN: Right.

15 MEMBER RICHARDSON: So.

16 MEMBER FELDMAN: However.

17 MEMBER RICHARDSON: Right. Yes,  
18 they both have to go together, no, I agree.

19 MEMBER FELDMAN: Okay. In any  
20 event, I hope that can be done and we can  
21 cross-fertilize the information on that issue  
22 and see on the question of essentiality.

1 CHAIR STONE: Great. Very good.  
2 Thanks, everyone. Tracy, the last hurrah.

3 MEMBER FAVRE: All right,  
4 everybody take a deep breath. I think we're  
5 almost there. The end is in sight. That's  
6 either the train or the light at the end of  
7 the tunnel.

8 Final proposal for aquaculture is  
9 a petition for aquaculture vitamins B1, B12  
10 and H for aquatic plants as petitioned.

11 Calvin, you're the lead on that.  
12 Lisa?

13 DR. BRINES: Thanks, Tracy. The  
14 petition for vitamins was submitted on August  
15 3, 2012. The petition requests the addition  
16 of three specific vitamins, again, B12, B1 and  
17 H to the National List for use in aquatic  
18 plant production.

19 Of those three petitioned vitamins  
20 vitamin B1 is currently individually listed on  
21 the National List at 205.601(j)(8) as part of  
22 three other vitamins that are already allowed

1 for use in organic crop production.

2 The subcommittee did not request a  
3 new technical report in support of its review.

4 Thanks.

5 MEMBER FAVRE: Calvin?

6 SECRETARY WALKER: I make a motion  
7 that we go to lunch right now.

8 (Laughter)

9 SECRETARY WALKER: This will be  
10 very brief.

11 The title of this one is "Aquatic  
12 Plant Vitamins." And what we are hearing is  
13 that maybe a need for a TR. Because this  
14 particular material, B1, B12 and H. There was  
15 no TR for this particular material for plants  
16 use.

17 The Livestock Subcommittee  
18 received the petition from the Crop Committee  
19 in October of 2013. So we had a very short  
20 window to request a TR. And that was one of  
21 the concerns for some, there was no TR for  
22 this particular use in plants.

1                   And as Dr. Brines mentioned, B1 is  
2 already -- these vitamins are already being  
3 used in plants.

4                   As far as the evaluation criteria,  
5 again, as the public had told us how can we  
6 evaluate these criteria without a rule, but we  
7 did. And we have seen the error of our ways  
8 and we're going to go back and hopefully come  
9 back with something more meaningful the next  
10 time these come up as it relates to impact on  
11 human and environment, essentiality and  
12 compatibility.

13                   The committee as you could see was  
14 in support of this particular material, 7 yes,  
15 zero no on the classification motion.

16                   As it relates to the listing there  
17 was an objection by Colehour. And one other  
18 objection of the minority committee was in the  
19 absence -- in the change in the sunset process  
20 there needs to be a time-line for reevaluating  
21 these materials. And I'm sure Colehour may  
22 mention that but that was one of the concerns

1 that he had on a lot of these petitions.

2 And again, as Tracy mentioned,  
3 there's a large number of commenters and most  
4 were against what we had put forward. But we  
5 are optimistic that when we come back those  
6 numbers will be reversed and more clear.

7 And again, I'm not going to go and  
8 read all of the -- I'm just going to read a  
9 few different ones.

10 They said when you start naming  
11 people and calling names you don't want to  
12 leave anybody out so I'm going to pick a few  
13 different ones hopefully again for some.

14 But again, when you have the same  
15 outstanding group such as OTA and Cornucopia  
16 and Food Safety and the rest having issues and  
17 all on the same side, that kind of tells you  
18 that you need to go back and look at what we  
19 have done. And it's very rare that you would  
20 have them all on the same side. And if we  
21 don't get it right we may not want the program  
22 to do that.

1                   And I said that with conflict of  
2 interest. Everyone has had some issue with  
3 conflict of interest. So we dilly-dallied for  
4 some time and then eventually the program had  
5 to step in and they've taken over that  
6 particular matter based on their authority.

7                   Okay, some of the objections of  
8 the public which I always find good. I  
9 sometimes spend three and four days reading  
10 the public comment because I find that you all  
11 are very intelligent. You are far smarter  
12 than I am. So, I sometimes take three and  
13 four days off just to read the comments  
14 because you all are very insightful as  
15 Chairman Mac had mentioned.

16                   Food and Water Watch. Let me pick  
17 out one particular one for this one that I  
18 didn't read before that I thought that others  
19 expressed.

20                   So, as you know, NOSB  
21 recommendation on fish farming has been  
22 extremely controversial, especially the use of

1 open net pens for fish. Yet there are no  
2 standards for organic aquaculture operations.

3 Thus, the use of synthetic  
4 materials in organic production is likewise  
5 highly controversial. And voting on allowing  
6 synthetic materials in organic agriculture  
7 before we even know what these operations will  
8 look like is not acceptable.

9 And I just underlined that it was  
10 from at least 59 states and 10 countries  
11 signed the petition.

12 Okay. Moving down here. As it  
13 relates to a citizen, again, she had a nice  
14 comment from Washington.

15 CHAIR STONE: I thought you were  
16 hungry.

17 SECRETARY WALKER: Yes.

18 (Laughter)

19 SECRETARY WALKER: Okay, I'm here,  
20 A. This particular citizen we heard  
21 yesterday. I didn't read these two but I kind  
22 of highlighted some of the ones. A formal

1 assessment of risk and impact must be  
2 conducted before NOSB proceeds with  
3 greenlighting an industry that most consider  
4 incompatible with organic principles,  
5 especially those important practices that  
6 biodiversity, minimize environmental impact,  
7 control inputs and allow natural behavior.

8           And C., pollution, pathogens and  
9 parasites cannot be confined in a fluid  
10 environment.

11           Getting near the end here. Beyond  
12 Pesticides, something that -- A. Inputs must  
13 be judged in the context of an aquaculture  
14 system. And that's even been the sentiment of  
15 others that had written in.

16           Almost near the end here. Oregon  
17 Tilth annotations for vitamins. Well, they  
18 essentially had an issue with the annotation  
19 for aquatic plants and animals, that it should  
20 be the same as in the -- what we already have.

21           Okay, Maine Organic Farmers and  
22 Gardeners Association. I believe that covers

1 several states. It's an OFPA mandate that  
2 producers must provide organically produced  
3 animals with toll feed ration -- okay, let me  
4 skip that one. We're opposed to giving an  
5 organic label to fish that lives or moves in  
6 and out of an undesignated area that is not  
7 controlled by the producer.

8 So, to make the long and short,  
9 the public comment was for, as we have heard  
10 yesterday and the day before, was bringing  
11 these particular materials back, and maybe for  
12 some may even need a TR that we can chisel  
13 into some of the things that they had a  
14 concern about. That's it.

15 CHAIR STONE: All right.  
16 Specifics around the vitamins in aquatic  
17 plants? Colehour?

18 MEMBER BONDERA: Thank you. Thank  
19 you, Calvin. I just want to add two little  
20 notes to that concept of this being brought  
21 back to the subcommittee and considered  
22 further.

1                   And one is you suggested and I  
2 think it's appropriate which is consider  
3 annotation by system or definition of what  
4 systems are being -- this is being approved  
5 for. And I think we should seriously consider  
6 that.

7                   And I think that the other issue  
8 which isn't in my opinion adequately addressed  
9 but needs a little more attention is  
10 considering whether or not there realistically  
11 are natural source alternatives to be looking  
12 at or considering regarding deciding whether  
13 or not this is essential as petitioned. Thank  
14 you.

15                   CHAIR STONE: Calvin?

16                   SECRETARY WALKER: I'm not sure if  
17 I gave that to the committee but that was one  
18 of their concerns.

19                   I did email one of the  
20 manufacturers. Being an animal scientist I'd  
21 never heard of vitamins for plants. I've  
22 heard of NPK, trace minerals and those things.

1                   But one of the manufacturers of  
2 these vitamins did email me back. I didn't  
3 let him know I was on the NOSB or anything.  
4 But the person that the petitioner referred  
5 to, they had the view that the vitamins for  
6 plants were not needed if you provide the  
7 other essential elements in the system.

8                   I'm not sure if I shared that,  
9 Madam Chair, with the committee, that  
10 particular email from the manufacturer.

11                   CHAIR STONE: Okay. That's great.  
12 Tracy, you want to do sort of a generic wrap-  
13 up?

14                   MEMBER FAVRE: Yes. Thank you,  
15 Mr. Chair. We appreciate all of your all's  
16 patience today as we've slogged through these  
17 materials.

18                   As you can see we have a lot of  
19 work to do going back and tweaking and  
20 refining these. That was really my goal and  
21 objective for bringing these materials forward  
22 is to have this kind of dialogue to seek the

1 public comment. I'll reiterate that because  
2 that is really important to understand.

3 These are complicated issues. The  
4 use of these materials is complicated and we  
5 certainly need the input. In this case it  
6 sort of takes a village to craft the proposals  
7 for this.

8 I would also like to, whoever  
9 might be listening to this or reading this in  
10 the public record strongly urge that potential  
11 producers of organic aquaculture weigh in on  
12 the public comments.

13 The public comments are very  
14 strongly listened to and influence our  
15 deliberations and our discussions.

16 And I personally truly appreciate  
17 all the comments we've received. However, I  
18 feel as though they're slightly unbalanced  
19 right now. We've had a great deal of input  
20 from consumers and certifiers and consumer  
21 groups, but we've heard very little from the  
22 producers themselves except as an aggregate of

1 the Aquaculture Working Group. So I think it  
2 would be useful for us to hear.

3 We've had several remarks made in  
4 today's comments about the essentiality of  
5 some of these materials. And it's difficult  
6 for us to really weigh that without having the  
7 expertise.

8 I've heard comments over the last  
9 few days about unless you're a farmer you  
10 don't get it. Or unless you use XYZ material  
11 you don't understand whether it's essential or  
12 not.

13 And I think that's particularly  
14 true in something like this where these are  
15 complicated systems.

16 So with that I think I will say  
17 that we are going to wrap up unless there's  
18 any other comments from the group. And I  
19 appreciate everyone's attention so thank you.

20 CHAIR STONE: Well, I want to  
21 personally thank on behalf of the rest of the  
22 Board members the subcommittee.

1                   It was awkward. It was new  
2                   territory. There was a lot of angst. They  
3                   knew, you all knew as a subcommittee that this  
4                   was a lot of interest and a lot of concerns  
5                   around this and appreciated how well you  
6                   worked through it, and produced something that  
7                   gave us enough information for the rest of us  
8                   to sort of weigh in.

9                   I appreciate Jay and Colehour and  
10                  others, those that weren't on the committee  
11                  but showed interest and joined in the  
12                  discussion. So, real loud applause for you  
13                  all for what you did to get us to this point.  
14                  And now it will be much easier to take that  
15                  next step.

16                  I've got 12:30 essentially so  
17                  we'll be back here at 1:45 and begin the  
18                  afternoon. Thank you very much.

19                  (Whereupon, the foregoing matter  
20                  went off the record at 12:32 p.m. and went  
21                  back on the record at 1:51 p.m.)

22                  CHAIR STONE: So, if those of you

1 in the back mind taking your seat we're going  
2 to go ahead and ramp back up. I know it's  
3 hard to get out and eat and get back in an  
4 hour and 15 minutes but we're pretty much on  
5 time.

6 We had a great conversation this  
7 morning. I appreciate the Board members and  
8 their thorough yet succinct conversation over  
9 a complicated topic.

10 So if we can continue in that vein  
11 this afternoon we can get a lot more work done  
12 and be fully prepared with comfort level  
13 around all of these different proposals that  
14 we're evaluating for tomorrow's ultimate vote.

15 So with no further ado I'll turn  
16 the program lead over to Ms. Carmela Beck for  
17 the Compliance, Accreditation and  
18 Certification Subcommittee conversation.  
19 Carmela?

20 MEMBER BECK: Thank you, Mac. So  
21 I'd just like to thank the members of the  
22 Compliance, Accreditation and Certification

1 Subcommittee for their collaborative work over  
2 the past few months.

3 Today we have three items on the  
4 agenda. The first topic is titled "The  
5 Request for NOP Clarification and Guidance on  
6 Retail Compliance and Certification."

7 The second topic is titled  
8 "Towards Clarifying Accredited Certifying  
9 Agents' Application of 205.206(e).

10 And the third item will be a brief  
11 statement regarding sound and sensible.

12 So I will just go ahead and we'll  
13 go in that order. So I'm wondering, Joe, if  
14 you could go ahead and get started. Thank  
15 you.

16 MEMBER DICKSON: Thank you,  
17 Carmela. So, we have a proposal on retail  
18 certification and certification requirements  
19 before us.

20 This is a subject that of course  
21 is really close to my heart and I'm really  
22 happy to see it on the NOSB agenda once again.

1                   It first appeared on this agenda  
2 back in 2007 before I was on the Board and I  
3 worked at the time and provided testimony --  
4 and worked at the time with Bea James who was  
5 our retail representative who put a lot of  
6 work and effort and outreach into the  
7 recommendation that that Board came up with.

8                   It's a proposal that covers a very  
9 complex series of issues that affect the  
10 entire retail sector. We have retailers of  
11 all sizes and types from national chains to  
12 single-store independent food stores and co-  
13 ops, farmers markets.

14                   Since the rule came out we have  
15 seen a proliferation of virtual and online  
16 retail outlets that didn't exist in the same  
17 form in 2000 and 2002. And really, any place  
18 that organic products are made available  
19 directly to consumers.

20                   We've seen in the news in the last  
21 couple of weeks a few large national  
22 conventional retailers are working on boosting

1 their organic offerings. That really does  
2 underscore how timely this recommendation is.

3 As the final step in the whole  
4 organic supply chain from grower to consumer  
5 retailers have a critical role to play in  
6 ensuring that organic products are sourced,  
7 handled and marketed with care and integrity.

8 However, retailers are one of the  
9 only links in the whole supply chain that are  
10 exempt from the requirement for certification  
11 in the rule.

12 Because of this exemption many  
13 retailers lie outside of the certification  
14 infrastructure and the supervision that  
15 certified retailers and certified handlers and  
16 growers all receive from their certifiers.

17 For the store where I work because  
18 we are a voluntarily certified retailer we  
19 operate under a very strict organic system  
20 plan and the continuous supervision and  
21 inspection of our certifier.

22 For stores that are not certified

1 there's constant certifier feedback. And so  
2 -- or there isn't rather that feedback. So  
3 there are greater opportunities for non-  
4 compliance in that segment of the sector.

5 That's why the main focus of the  
6 recommendation we've come up with is not  
7 enforcement but rather education. We've asked  
8 the program to proactively reach out to  
9 retailers, especially uncertified retailers  
10 but also all retailers to enhance their  
11 understanding of what the rule requires in a  
12 retail environment.

13 In addition, we've asked the  
14 program to clarify a few parts of the rule  
15 that are very confusing or perhaps ambiguous  
16 for retailers. This represents a huge  
17 opportunity to enhance understanding, improve  
18 consumer confidence in the organic label and  
19 to ensure integrity within a segment of the  
20 organic supply chain that remains largely  
21 uncertified.

22 I co-led this initiative with my

1 colleague Harold Austin. I didn't want to  
2 take this on solely because I am the retail  
3 representative and wanted to share the fun of  
4 this work.

5 Harold, do you have anything you  
6 want to add?

7 MEMBER AUSTIN: Thanks, Joe. You  
8 know, I think there was a lot of good public  
9 comment coming back in on this from various  
10 stakeholders in the organic community.

11 And I think from what we saw,  
12 whether it was from the consumer groups, or  
13 whether it was from some of the organic trade  
14 associations, or some of the retailers  
15 themselves, we got some really good feedback.

16 Everybody was very, very positive  
17 of this document that we're moving forward.  
18 And they liked the fact that it's outreach and  
19 education and some very specific points that  
20 were listed in there.

21 MEMBER DICKSON: Thank you,  
22 Harold. Michelle, could we have the

1 recommendation or the proposal on the screen?

2 I can still just kind of talk through it. I'm  
3 not going to read the whole thing verbatim.

4 This was on the agenda for the  
5 canceled meeting in Louisville as a discussion  
6 document. And the intent of that document had  
7 been to ask a series of very specific  
8 questions of the organic community to answer  
9 to sort of give us a body of data and feedback  
10 to take back as a committee and use to fashion  
11 a recommendation.

12 That meeting of course didn't  
13 happen but it did solicit a fair amount of  
14 public comment from retailers, from  
15 certifiers, from non-profit groups and others  
16 in the community.

17 We felt we had enough to go on  
18 there to take that feedback and turn it into  
19 the proposal that we're presenting now.

20 As I mentioned before, the NOSB  
21 made its last guidance recommendation back in  
22 2009 called "Clarification of Marketing for

1 Voluntary Retail Certification."

2 It covered some of the issues that  
3 we have covered in this recommendation but not  
4 all of them. Its focus was more on the  
5 certified organic retailer, a retailer who's  
6 volunteered to become certified, and the kinds  
7 of marketing claims that such a retailer could  
8 make.

9 And we have included that among  
10 the issues that we cover in the current  
11 recommendation.

12 The 2009 recommendation also asked  
13 the program for clear guidance on the use of  
14 the USDA seal in marketing certified  
15 retailers; clear guidelines for deli and  
16 bakery operations identifying precisely under  
17 what considerations certification is required;  
18 additional guidance on the accredited  
19 certifying agent's role in managing voluntary  
20 retailer certification; and clarity on the  
21 retailer's role in improving the marketing of  
22 voluntary retailer organic certification.

1                   So those are all areas from the  
2                   2009 recommendation that we've sort of  
3                   restated in this one.

4                   We've also asked for a number of  
5                   sort of broader pieces of education and  
6                   outreach from the program that don't  
7                   specifically apply to certified retailers but  
8                   to retailers in general.

9                   As I mentioned before, certified  
10                  retailers get a lot of supervision and a lot  
11                  of oversight from certifiers acting as agents  
12                  of the National Organic Program. Uncertified  
13                  retailers do not.

14                  And especially with the growth of  
15                  farmers markets and online marketplaces we'd  
16                  like to see the program come out with some  
17                  really targeted outreach and education  
18                  focusing on those particular types of  
19                  retailers.

20                  There are also a couple of areas  
21                  of the rule that could bear some clarification  
22                  as to how they apply to retailers that are

1 exempt and excluded from the certification  
2 requirements.

3 For example, it's not clear the  
4 extent to which exempt retailers -- it is  
5 clear that they're required to comply with the  
6 record-keeping requirements in the rule, but  
7 it's not explicit entirely the extent to which  
8 retailers need to also comply with the  
9 commingling and the contamination provisions  
10 in the rule.

11 There's also a question as to  
12 whether excluded operations are required to  
13 comply with the record-keeping operations in  
14 205.101(c).

15 There's also some room for  
16 interpretation around what it means to handle  
17 or process. The exemption applies to  
18 retailers who process or handle -- or process  
19 foods that are prepared to be eaten onsite, or  
20 are processed onsite rather.

21 One of the questions, for example,  
22 that came up on our committee discussion was

1 a retailer that is processing products onsite  
2 but then selling them both onsite and in an  
3 online venue. That was one area where we  
4 thought we could use clarification.

5 And then as a few of the  
6 commenters confirmed and we brought up in our  
7 recommendation, you know, when a retailer  
8 brings in produce, say, and takes in a case of  
9 avocados and re-stacks them on the sales  
10 floor, have those been handled under the rule  
11 and in that particular situation?

12 Can a retailer still use the USDA  
13 seal and the term "certified organic" when  
14 they have handled, or re-stacked, or re-  
15 packaged a previously certified product in an  
16 uncertified environment?

17 That really summarizes the bulk of  
18 our recommendation. The public comment that  
19 we received for this meeting was pretty  
20 substantial.

21 We did receive a few comments.  
22 Bea James, the original sort of shepherd of

1 this recommendation from 2009 made a series of  
2 suggestions asking us to actually add the  
3 terms "merchandiser" and certain provisions  
4 related to retail operations to the rule  
5 itself.

6 The consensus among the committee  
7 was that that type of rule change was outside  
8 of the scope of this recommendation, but we  
9 would like to look specifically at her  
10 recommendations and other recommendations for  
11 rule change that were received, some from  
12 Beyond Pesticides as well. And really look at  
13 those as a committee and consider them  
14 separately.

15 We got pretty supportive feedback  
16 from Crop, especially on the sort of question  
17 of the virtual marketplace and online sales  
18 and how they fall under the retail exemption.

19 CCOF supported the recommendation  
20 and reiterated their concerns about the use of  
21 the term "certified organic" and the USDA seal  
22 itself on products that have been handled in

1 retail stores.

2 A few consumers wrote in with  
3 supportive comments.

4 The Accredited Certifiers  
5 Association provided very detailed comments  
6 supporting the recommendation and our request  
7 for clarification from the program.

8 The Organic Trade Association  
9 actually convened a retailer task force that  
10 they put together and based on the work of  
11 that task force provided very detailed  
12 comments to the committee.

13 And finally, MOSA also provided  
14 supportive comments as a certifier.

15 To summarize the subcommittee  
16 vote, the subcommittee voted 7 in favor, none  
17 not in favor or abstaining on this proposal.

18 And Harold, do you have anything  
19 to add about the process or the  
20 recommendation?

21 MEMBER AUSTIN: No, I think, you  
22 know, we had a lot of discussion on the

1 subcommittee prior to the fall meeting and  
2 then after the fall meeting.

3 And then listening to -- we did,  
4 you were right. We got a lot of really good  
5 comments in preparation for the council in  
6 Louisville. Which just kind of reiterated  
7 that this was the right direction to move,  
8 especially based off of the growth.

9 And I think you kind of touched on  
10 a lot of it, Joe. The organic industry has  
11 grown considerably. And the retail  
12 certification is a voluntary certification.  
13 So, those people that choose to certify  
14 understand the rules and they have a good  
15 concept of it.

16 But it's that other segment where  
17 the growth really lies that the outreach I  
18 think is imperative that we help to give the  
19 program some very specific guidelines to go  
20 out with the outreach and education. And I  
21 think this will help do that to ensure the  
22 organic integrity that we're all seeking.

1                   And it's no fault of these people,  
2                   whether it's the increased farmers markets or  
3                   the other various retail operations. They're  
4                   just not aware. And so if we can find a  
5                   vehicle to provide that education, outreach  
6                   and education for them I think it's a solid  
7                   move for our industry as a whole.

8                   And so I think this will help  
9                   cover a lot of those if acted upon.

10                   MEMBER DICKSON: Yes, well said.  
11                   And to reiterate too I think that's the most  
12                   important piece is that uncertified retailers  
13                   are perhaps -- are one of the only major parts  
14                   of our whole supply chain that aren't under  
15                   the continuous supervision of certifiers.

16                   And so that doesn't mean that  
17                   they're, you know, necessarily not in  
18                   compliance but I think that that area could  
19                   bear some extra outreach and education and the  
20                   same support that we all within the certified  
21                   world get on a daily basis.

22                   CHAIR STONE: Others? Miles?

1 MR. MCEVOY: Yes, this is an area  
2 that we have a lot of interest in. We are  
3 working on a number of documents around this  
4 topic area. We have a fact sheet that we're  
5 working on for direct marketing, for organic  
6 claims for direct marketing operations, mostly  
7 directed towards farmers markets. We hope to  
8 have that out within the next few weeks.

9 We're also -- on our quality  
10 management list we have a policy memo about  
11 community-supported agriculture around  
12 retailing and the definition of retail  
13 operations.

14 The concept of doing outreach and  
15 education, more of that retail operations I  
16 think is a good one and we'll certainly try to  
17 do more and more of that to explain the  
18 requirements for retail operations.

19 And then the open questions that  
20 you have, this is where the program and AMS  
21 really would -- I mean, we're fine to go back  
22 and answer the question, but it's always nice

1 when the Board can provide us with your  
2 recommendation on how to answer those  
3 questions and what your preference is in terms  
4 of the interpretation of those sections that  
5 are identified.

6 Certainly that's our  
7 responsibility to provide that clarification  
8 but it also is very nice if the Board can  
9 provide us with your best advice, your best  
10 recommendation about how those various  
11 sections should be clarified and interpreted.

12 CHAIR STONE: So, you're asking --  
13 so we asked these specific questions and we  
14 got good feedback, but how do we incorporate  
15 that into the recommendation in a follow-up?  
16 I mean, have you thought about how to do that,  
17 Joe?

18 MEMBER DICKSON: Yes, Miles, do I  
19 -- I think I hear you saying that you'd rather  
20 receive this recommendation with the answers  
21 to our questions sort of penciled in.

22 MR. MCEVOY: Right.

1                   MEMBER DICKSON: Okay. That's  
2 good feedback.

3                   CHAIR STONE: Yes, that's kind of  
4 what I was sitting here thinking too. That's  
5 very good for the Board to have that  
6 opportunity to assimilate everything from the  
7 community on behalf.

8                   One specific question that has  
9 always interested me are the green-washing of  
10 the label. Like the markets where they may  
11 certify the pastures but not the livestock.  
12 And they have an organic seal and talk about  
13 being certified organic but it's not the  
14 product.

15                   Those sort of gray areas are  
16 really tough. So if we could spend a little  
17 more time with it we might could help the  
18 program in identifying some of that type of  
19 thing.

20                   MEMBER DICKSON: Miles, you  
21 mentioned the program has a few pieces of  
22 guidance or education forthcoming. Do any of

1 those answer parts of these questions already?

2 MR. MCEVOY: We'd have to take a  
3 look at that. The fact sheet for direct  
4 market operations, no. The CSA policy may  
5 address some of those things.

6 But I think what we could do --  
7 because that's further along. It has a lot  
8 further along the python to go before it gets  
9 out. It's early enough probably in that  
10 process that these particular questions could  
11 go into the mouth of the python and possibly  
12 come out the other end.

13 (Laughter)

14 MEMBER DICKSON: I guess what I'm  
15 asking is should we feed them to the python at  
16 this meeting? Like, would you rather that the  
17 python get fed these questions now or in the  
18 fall with answers filled in?

19 MR. MCEVOY: Yes, you can -- we  
20 can take the questions now. Yes, absolutely.  
21 It will help our process. If we get the  
22 questions now then we know that those are

1 important questions to answer and we have our  
2 staff and our legal review try to answer those  
3 questions.

4 And if we have some questions as  
5 we try to answer your questions we'll come  
6 back to the Board with further questions.  
7 How's that sound?

8 MEMBER DICKSON: That sounds fun.

9 CHAIR STONE: That python's  
10 wrapping around something here, but I'm not  
11 sure.

12 (Laughter)

13 CHAIR STONE: So that also means a  
14 follow-up in the fall. But get them started  
15 and get that. Great.

16 Other comments? Jay, you had your  
17 hand up a minute ago. Anybody else? Sounds  
18 like collaboration to me.

19 Okay, great, Joe. Thank you for  
20 bringing that to our attention with your  
21 expertise. And Harold, thanks for your  
22 leadership on that as well. Carmela?

1                   MEMBER BECK: Yes, so can I just  
2 get clarification? So, will we be moving this  
3 document forward for a full Board vote and  
4 then issue another document in the fall?

5                   CHAIR STONE: Yes, ma'am.

6                   MEMBER BECK: Great. So, it  
7 sounds like we can move this to a full Board  
8 vote at this point. Okay.

9                   CHAIR STONE: Very good.

10                  MEMBER BECK: All right. So, I'll  
11 go ahead and make the motion. So, the motion  
12 is to accept the request for NOP clarification  
13 and guidance on retail compliance and  
14 certification proposal. Can I get a second?

15                  MEMBER AUSTIN: Second that.

16                  MEMBER BECK: Thank you, Harold.

17                  CHAIR STONE: So, we have a motion  
18 and a second. We're going to move this one on  
19 through thinking that tomorrow might be full  
20 and this is pretty straightforward.

21                         So, we'll begin -- we don't have  
22 an order yet. So moving from clockwise. So

1 we'll start with Colehour on this vote.

2 MEMBER BONDERA: Thank you. Aye.

3 MEMBER TAYLOR: Aye.

4 MEMBER FELDMAN: Aye.

5 MEMBER AUSTIN: Yes.

6 VICE CHAIR FOSTER: Yes.

7 SECRETARY WALKER: Yes.

8 MEMBER RICHARDSON: Yes.

9 MEMBER DICKSON: Yes.

10 MEMBER BECK: Yes.

11 MEMBER FAVRE: Yes.

12 MEMBER MARAVELL: Yes.

13 MEMBER FULWIDER: Yes.

14 MEMBER THICKE: Yes.

15 CHAIR STONE: Chair votes yes and  
16 one absent. Thank you, Carmela.

17 Okay, next up?

18 MEMBER BECK: All right. John,  
19 would you mind?

20 CHAIR STONE: So I've got 14 yeses  
21 and 1 absent. Thank you. Motion passes.

22 VICE CHAIR FOSTER: Yes, Carmela,

1 I'd be more than happy to do that. Calvin,  
2 I'm starting to appreciate the chaos of vote-  
3 counting and doing your other work here. Yes,  
4 hat's off to you. You did it great last time.

5 In front of us now we have a  
6 proposal to move a document forward to the NOP  
7 toward clarifying accredited certifying  
8 agents' application of Section 205.206(e).

9 This was a document that was  
10 discussed in the main for presentation at the  
11 fall 2013 meeting. Of course with the  
12 shutdown not voted on or discussed at that  
13 time.

14 We discussed it a bit this winter  
15 and in the spring brought it forward unchanged  
16 as noted on the version that was posted. We  
17 voted on that again February 11, 2014 to move  
18 it forward as a proposal. It was unchanged  
19 since last fall.

20 There were no revisions to content  
21 and we opted to move this forward as a  
22 proposal.

1                   Now, with all this discussion of  
2                   the python we may need to revisit, have a  
3                   similar conversation as we just had with  
4                   retail. But we'll cover that I think at the  
5                   end. I just wanted to say python because  
6                   everyone else has done it.

7                   The intent of this document was to  
8                   provide a means of asking the certification  
9                   community some questions about their views on  
10                  the application of 205.206(e).

11                  It was also intended to highlight  
12                  kind of the cascading approach to -- that  
13                  organic producers are very familiar with in  
14                  order to manage pests, weed, disease issues.

15                  And very importantly, also  
16                  reminding all of the stakeholders, community,  
17                  Board, everyone in between that our primary  
18                  function of reviewing and discussing  
19                  substances on the National List, while we  
20                  always perform that with respect to the  
21                  criteria in 205.600, that's where most of our  
22                  deliberations are, we also need to do that in

1 the context and with respect to and for the  
2 requirements of 205.206.

3 There were several good  
4 substantive public comments including Beyond  
5 Pesticides, OTA, NOC. There was also an  
6 individual comment generally supportive of the  
7 direction of the proposal.

8 Three of them had some kind of  
9 modifications. I believe it was the NOC  
10 recommendation were quite thorough on  
11 suggesting where it might go farther, some of  
12 the questions might go farther or re-framing  
13 of the questions. That was very helpful.

14 There was also a desire in the  
15 comments to bring kind of overarching  
16 principles of organic production and handling,  
17 that document the Board passed several years  
18 ago, to bear on the deliberations.

19 And I don't know about which is  
20 the cart and which is the horse, which is the  
21 dog, which is the tail here, but I think that  
22 those principles are -- have a reflection in

1 this codification of basically IPM.

2 And to my knowledge it's the only  
3 federally mandated IPM program. And even  
4 though it's not called that here that's really  
5 what it is.

6 For me that's a very proud moment  
7 for the organic community. Because I don't  
8 think you find that requirement anywhere else  
9 in federal regulation.

10 Another commenter had some  
11 confusion about the structure of the proposal.  
12 I understand that because the proposal does  
13 have some kind of just discussion document  
14 tendencies. That's because it was generated  
15 as a discussion document. In the course of  
16 the deliberations recognized that we could put  
17 that forward.

18 It achieved the intent that we had  
19 talked about so there's no reason not to put  
20 it forward as a proposal, mostly as an  
21 advisory to the program and a way to highlight  
22 the issues that we felt were important.

1                   We had some real articulate spoken  
2                   comment here from I think it was Mr. Moore or  
3                   Ms. Randolph. That's on the record already.  
4                   It was very well received. I think timely  
5                   also.

6                   Particularly I was struck by Mr.  
7                   Moore's recognition that this is an  
8                   opportunity. I liked his phrasing, a call to  
9                   action to address this core tenet and raise  
10                  the profile of it.

11                  I think consumers want that. I  
12                  think they want to know that. And several of  
13                  the comments highlighted the consumers' desire  
14                  to want to know the steps that are taken in  
15                  the production of their organic food. I agree  
16                  with that completely.

17                  My observation in the last four  
18                  years of a lot of subcommittee discussions  
19                  was, and I've mentioned this in subcommittee  
20                  meetings frequently and at public meetings in  
21                  the past also that we often forget there is  
22                  this context.

1                   And this was also an opportunity  
2                   to remind ourselves that all the criteria, the  
3                   technical criteria that we spend most of our  
4                   time on, that's the core. I get that. But I  
5                   don't want to forget what's operating in the  
6                   background either. And this 206 is part of  
7                   that background.

8                   That's about it in summary. The  
9                   subcommittee voted 7 to zero with 1 absent to  
10                  move it forward as a recognition of these  
11                  important items to the NOP.

12                  And now, with respect to the  
13                  python I don't know where we want to -- if we  
14                  want to include -- whether we want to vote on  
15                  this as is now but create another document  
16                  that includes more of the public comment that  
17                  we received in the fall like the previous  
18                  proposal. We can do that. I would leave that  
19                  up to Madam Chair.

20                  MEMBER BECK: Just for  
21                  clarification I think when we published this  
22                  it accidentally had the word "proposal" on it

1 and it was supposed to be a discussion  
2 document.

3 VICE CHAIR FOSTER: Other members  
4 of the CACS? Is that everyone's recollection?  
5 Excellent. Then everything I just said about  
6 that, change that. That was not my  
7 recollection but I'm happy to be wrong on  
8 that.

9 MEMBER FELDMAN: Is that a  
10 substantive change?

11 VICE CHAIR FOSTER: I hope not.  
12 In that event then, heck, we can move it  
13 forward as a discussion document at this time.  
14 We would then kind of as a matter of protocol  
15 include all the public comments, re-wrap that  
16 and put that forward as a proposal in the  
17 fall.

18 Miles?

19 MR. MCEVOY: Yes, I'm glad it's a  
20 discussion document because my question was  
21 going to be what are we supposed to do with  
22 this. Like what your expectation was.

1                   So if you have -- yes. Because it  
2                   should be a recommendation or advice for us to  
3                   do something. Otherwise it's like, okay,  
4                   that's nice. So, great. It looks like a  
5                   great discussion document. Thanks for your  
6                   really great work on this.

7                   VICE CHAIR FOSTER: Happy to make  
8                   this a discussion document. That would make  
9                   it a very natural progression to incorporate  
10                  all of the public comments received, perhaps  
11                  add some of the questions or modify them and  
12                  then ask you to put those forward in a more  
13                  formal way in the fall meeting. Excellent.

14                 CHAIR STONE: Great. Is there any  
15                  other input for the committee? Nick?

16                 MEMBER MARAVELL: Yes, I have  
17                  basically three points.

18                 The first is is there -- what was  
19                  your feeling as the extent to which this is a  
20                  major gap or problem or an issue.

21                 The second point is did you give  
22                  any thought to how this might impact the

1 paperwork burden on the farmer and tying that  
2 into sound and sensible.

3 And then the third point is is  
4 this an organic or a wild-caught python?  
5 Because then I want to know what we're feeding  
6 it.

7 MR. MCEVOY: Is that question for  
8 me?

9 MEMBER MARAVELL: It was simply  
10 for consideration as these issues are  
11 developed. If somebody wants to respond  
12 that's fine.

13 MR. MCEVOY: Okay, yes. Yes,  
14 well, this is something that is done by  
15 certifiers all the time. This is that part of  
16 the certification process that's very  
17 thoroughly reviewed for each production  
18 operation. It's very much incorporated into  
19 the requirements under the organic system  
20 plans.

21 So when producers write their  
22 organic system plans they're demonstrating --

1 if they are using any substances they have to  
2 demonstrate how they comply with this  
3 progressive pest control practices. They can  
4 only use pest control practices if they have  
5 these other -- if they have the other  
6 practices in place. So there's the cultural  
7 practices, resistant varieties, biological  
8 control, all those things have to be utilized  
9 before they can use those substances for pest  
10 control.

11 So a very standard practice in the  
12 certification process. It's something that we  
13 look at very thoroughly when we do our  
14 accreditation audits to ensure that certifiers  
15 are adequately reviewing this both when they  
16 review the organic system plan and when  
17 they're onsite conducting the inspections,  
18 that yes, they check all those substances to  
19 make sure that they comply with the standards.

20 But they're also checking to see  
21 that there's compliance with the provisions of  
22 205.206. A lot of focus on this area. It's

1 really some of the most fascinating parts of  
2 the inspection when you're out there doing the  
3 inspections is talking about the whole  
4 integrated system of the crops, and the  
5 plants, and the pest control systems, and how  
6 they all interrelate, and how they sometimes  
7 need to use substances to control certain  
8 pests.

9           But for the most part on an  
10 organic system most pests, insects, disease,  
11 weeds are controlled by an integrated system  
12 without inputs.

13           Impact on farmers/handlers. There  
14 is an impact. There's a lot of explanation of  
15 really what farmers are doing, especially  
16 organic farmers are doing. They have to  
17 translate that from what they just normally do  
18 to a paperwork format.

19           So they've got to translate it  
20 from their mind and put it on paper. For some  
21 farmers that's quite a struggle because that's  
22 not what they're -- they're farmers. They're

1 not in the business of writing down -- writing  
2 books, I guess.

3 But they do it. There is that  
4 requirement, that it is documented and it's  
5 reviewed, and it's also documented and  
6 reviewed by the inspector and the  
7 certification agency.

8 So there's -- there's nothing new  
9 here. This is just part of the system that's  
10 been set up for many, many years.

11 And is it organic or wild-caught?  
12 Hmm. I think it's organic. I don't think  
13 it's wild-caught. Yes, we're very cultured in  
14 the South building. I don't think there's any  
15 wild buildings in the South building. Some  
16 rats down in the basement.

17 CHAIR STONE: Okay, Nick? Follow-  
18 up?

19 MEMBER MARAVELL: Yes. My point  
20 was exactly what you just stated, Miles, which  
21 is I think we're already doing this. My  
22 certifier does that to me every OSP. So I was

1 just wondering was I missing something here  
2 that perhaps we're not doing adequately. That  
3 was really the nature of my question. And if  
4 we're not doing adequately will that then  
5 result in yet additional paperwork burden.  
6 I'm just sort of trying to respond as a  
7 farmer.

8 CHAIR STONE: John?

9 VICE CHAIR FOSTER: So that did  
10 come up in the discussion. I remember  
11 conversations primarily around the folks that  
12 have been doing inspections in the past,  
13 myself, Jean, others, that there is some  
14 variability in how across those 80-some odd  
15 certifiers.

16 My observation has been in the  
17 United States the larger certifiers are pretty  
18 consistent about it, the larger certifiers by  
19 number. And that by definition would mean the  
20 amount of variability is pretty slim.

21 I have noted more variability in  
22 foreign certifiers, particularly South

1 America. Some of that may be a translation  
2 thing, I don't know. But when I look at  
3 inspection reports or OSPs from South American  
4 suppliers, there's some nuances there that I  
5 think -- there's some variability.

6 I have every assurance that as  
7 ACAs they're doing that work. And I think  
8 that's what Miles was talking about.

9 But to what degree they focus on  
10 that, I think there's some variability there.

11 And in the context of us focusing  
12 our primary mission on thinking about  
13 materials and inputs for the National List the  
14 application of that in the field is where that  
15 rubber hits the road. And so any variability  
16 there is, you know, we should be talking  
17 about.

18 I don't think it's widespread but  
19 it's there. It's a minor -- it's not low-  
20 hanging fruit. We've picked all that. This  
21 is stuff higher up in the trees that needs  
22 just a little, a tweaking, perhaps.

1 CHAIR STONE: Jennifer.

2 MEMBER TAYLOR: Thank you. I was  
3 just wondering is there a reason why (f)  
4 wasn't included?

5 VICE CHAIR FOSTER: Can you read  
6 (f) to me?

7 MEMBER TAYLOR: "The producer must  
8 not use lumber treated with arsenic or other  
9 prohibited materials for new installations or  
10 replacement purposes in contact with soil or  
11 livestock."

12 VICE CHAIR FOSTER: Yes, because  
13 that didn't refer to this cascading sequential  
14 order of things. That (e), (e) essentially  
15 says thou shalt do (a), (b), (c), (d) before  
16 you try -- well, before you get to synthetics  
17 on the National List you've got to try these  
18 other cultural, physical, mechanical,  
19 biological practices before you get to  
20 synthetic materials. That was really the meat  
21 of it, that cascading effect is what we were  
22 focused on.

1                   And since (f) was focused on a  
2                   single use of a material that was not  
3                   dependent at least in (e) and above.

4                   MEMBER TAYLOR: It does impact the  
5                   other items though, don't you think?

6                   VICE CHAIR FOSTER: How so?

7                   MEMBER TAYLOR: Well, it doesn't  
8                   impact the -- maybe the nutrient content  
9                   management practice. You've got crop  
10                  rotation, sanitation measures, cultural  
11                  practices. Then it says don't use arsenic.  
12                  Just a minute, I lost it.

13                  VICE CHAIR FOSTER: That was not  
14                  part of the discussion amongst the  
15                  subcommittee.

16                  MEMBER TAYLOR: That's what I was  
17                  asking. Okay.

18                  VICE CHAIR FOSTER: Because we  
19                  were focused on the vast majority I think of  
20                  crop pest control materials is covered in (a)  
21                  through (d). The vast majority. And that was  
22                  the main focus. That was also kind of the --

1 what we had found to be most variable.

2 The application of 206(f) didn't  
3 seem to be that variable in the experiences  
4 that we were aware of prior to our  
5 discussions.

6 CHAIR STONE: Miles?

7 MR. MCEVOY: Yes, in our  
8 experience of doing accreditation audits we  
9 actually are seeing a fair amount of  
10 variability in the interpretation of (f). So  
11 we're working on some clarification of that.  
12 It's actually a very nuanced part of the rule.  
13 So we could report more information on that to  
14 the Board if you're interested.

15 CHAIR STONE: Okay. Anything  
16 else? Jennifer, I think your mike is still  
17 on.

18 MEMBER TAYLOR: Yes, thanks.

19 CHAIR STONE: Anything else from  
20 the Board? Do you want to vote this one while  
21 we're here? No vote? Okay, thank you.

22 MEMBER BECK: Okay. Well, thank

1 you so much. Can we go ahead and just move  
2 on, Mac, to your statement?

3 CHAIR STONE: Great. So, the  
4 committee, I guess it's a year ago now we had  
5 a discussion document around sound and  
6 sensible which a lot of that was to educate  
7 the broader community about the work that the  
8 program and the certifiers, the inspector core  
9 were working together to make a more sound and  
10 sensible certification process.

11 The Secretary I guess had  
12 approached Mark and Miles concerned that the  
13 increasing numbers of -- the numbers of  
14 organic operations was not increasing as fast  
15 as they would like and wondered what was going  
16 on.

17 And the onerous certification  
18 process was one of the things. High grain  
19 prices and there's other factors as well.

20 But so, the program has done lots  
21 of work. The certifiers as individuals, the  
22 ACA, the collective ACA with Scott Rice and

1 Pat Kane and the Board had done a lot of work.  
2 They had a working group to evaluate lots of  
3 different options.

4 So, the program recalibrated the  
5 accreditation auditors. The certifiers at the  
6 first of this conversation said yes, we can  
7 think of lots of stuff that we could do that  
8 would make this easier but it has to be  
9 compliant with our accreditation manual.

10 And then how the auditors  
11 interpret our implementation of our  
12 accreditation manual and that type of thing.  
13 Certifiers are in different parts of the  
14 country, different audit cores.

15 We had different beliefs and  
16 interpretations so there's inconsistency not  
17 just among certifiers but partly because the  
18 auditors had different feelings and different  
19 individuals and their perceptions.

20 So, the program, Miles and Sheri  
21 Courtney and that team, all of those  
22 accreditation managers worked very hard to get

1 consistency of the message, retooling of those  
2 accreditation auditors.

3 And the accreditation staff, Sheri  
4 and her staff meet more routinely. They bring  
5 each other news from the field if you will so  
6 that when they get questions from certifiers  
7 they were being answered in a more consistent  
8 way.

9 Prior to the Portland meeting I  
10 think Ib made reference to it in his public  
11 comment the other day, yesterday. We all sat  
12 in one room, representatives all sat in one  
13 room and discussed what are some options that  
14 we maintain integrity at all costs. But how  
15 do we answer these different types of  
16 questions.

17 So this obviously is an ongoing  
18 process and continual improvement is very much  
19 the moniker that this group, individuals are  
20 working continuously to think and work  
21 together.

22 At the annual certifier training

1 this year the program has a one-day  
2 educational update and then the certifiers  
3 have two additional days that they work  
4 amongst themselves for that continual  
5 improvement.

6 And it's nice to know that at the  
7 end of that second day Miles was giving the  
8 presentation and I was kind of the secretary  
9 of the conversation if you will.

10 After several questions Scott, the  
11 questions stopped coming in. Miles was just  
12 saying tell me what I need to know, tell me  
13 what I need to know. And the certifiers were  
14 much more comfortable. It was a great feeling  
15 to see the additional comfort from the first  
16 one of those I went to several years ago which  
17 is a shout-out to how well the certifiers and  
18 the accreditation folks are working to make a  
19 better system.

20 So, some of the things the  
21 certifiers are doing. One of the biggest  
22 things I mentioned yesterday is this

1 information exchange between operators and  
2 their certifier. Electronic updates. The  
3 different certifiers have different systems.  
4 It can be electronic.

5 Some smaller certifiers, they call  
6 them up on the phone and say what's different?  
7 How many chickens you got? How many cows you  
8 got? And that's the only difference. You  
9 know, buffers aren't changing, inputs aren't  
10 changing, barns aren't changing, milking  
11 systems aren't changing. So a more  
12 streamlined update to an annual update system.

13 Another big part of this was  
14 training inspectors, not just a more thorough  
15 exit interview process but Margaret Scholls  
16 and IOA are doing a good job of kind of  
17 reevaluating how the exit interview can be a  
18 valuable tool in all of this.

19 But also to help the inspectors be  
20 more comfortable in not consulting with the  
21 operator but to educate them, to explain the  
22 rule, interpret the jargon that's inherent in

1 the rule. Because as we said they're the face  
2 of certification to a lot of operators.

3 Material review is sort of this  
4 messy problem that certifiers and  
5 inconsistency across the different certifiers'  
6 capability to do good material review is sort  
7 of inherent in all this. Again, that's  
8 another part of the conversation.

9 The groups, the certifiers and the  
10 program agreed on definitions. It says you  
11 must document. Does that mean a piece of  
12 paper, or does that mean that the inspector  
13 can visually verify so there's not all of this  
14 paper that has to be submitted to the  
15 certifier? If there's a good communication  
16 between the inspector and the certifier visual  
17 verification can go a long way in reducing  
18 some of the paperwork burden that Miles  
19 referred to.

20 So all in all I guess certifiers  
21 are doing everything they can to make their  
22 clients happy but also sleep good at night

1 knowing that all of their operators meet the  
2 letter of the rule, and understand the rule,  
3 and can make those decisions going forward in  
4 a comfortable way, and have built a better  
5 relationship with the program and the  
6 accreditation staff, getting their questions  
7 answered.

8           The ACA, a shout-out to Pat Kane  
9 and the ACA as a group, how well they work  
10 together and try to help each other to gain  
11 this consistency across the spectrum on the  
12 various topics.

13           So, that's just sort of an  
14 overview and I would welcome any questions or  
15 thoughts. Francis?

16           MEMBER THICKE: I just want to  
17 report that last year my inspection -- it must  
18 be working because my inspection was so easy  
19 on my farm and my processing plant. It was  
20 just a totally different thing.

21           And I kept all the old information  
22 from last year in my database and just updated

1 things. That didn't change were the same.

2 Thank you.

3 CHAIR STONE: Would you like to  
4 repeat that, please?

5 (Laughter)

6 CHAIR STONE: Okay. Well, sure  
7 enough, thank you, Francis. That's one thing  
8 that's really good to hear. I know Miles and  
9 the certifiers are really glad to hear that.

10 Because it takes the accreditation  
11 -- not everybody gets accredited every year.  
12 They'd go bankrupt if they were -- had an  
13 audit every year. But it takes a few years  
14 for all of us to get fully implemented and the  
15 comfort level of certifiers.

16 If they retool in some way and  
17 their accreditation auditors are not  
18 comfortable with the reduction of a paperwork  
19 transfer, information transfer, then they're  
20 going to get a non-compliance and they have  
21 more work to go back to whatever it was.

22 So I know there's anxiousness

1 among certifiers, how far can they go without  
2 getting themselves in trouble. So I'm really,  
3 really glad to hear you say that you've  
4 already seen it and felt it on the ground.

5 So, Madam Chair, that concludes my  
6 report.

7 MEMBER BECK: Great, well those  
8 were our three topics so that concludes the  
9 CACS report.

10 CHAIR STONE: Thank you. Thank  
11 you. Carmela did a great job with running  
12 that committee this term.

13 Okay, Handling Subcommittee is  
14 next on the agenda. Harold Austin, chair of  
15 the subcommittee, I'll turn it over to you to  
16 get us started.

17 MEMBER AUSTIN: All right.  
18 Thanks, Mac. I'm just going to run over  
19 quickly what the Handling Subcommittee is  
20 going to be bringing forward to the full Board  
21 for deliberation today.

22 We've got two proposals. The

1 first proposal is to add to 205.605 ammonium  
2 hydroxide as a boiler water additive,  
3 petitioned.

4 The second proposal is to remove  
5 from 205.605(b) glycerin, CAS number 56-81-5,  
6 petitioned.

7 The next item is a discussion  
8 document. This document is talking about  
9 polyalkylene glycol monobutyl ether, from now  
10 on called PGME. This was petitioned to be  
11 added to 205.605(b) as a boiler water additive  
12 material. And we'll clarify that during our  
13 subcommittee preponderance.

14 We will have an update on  
15 ancillary substances. This will help to give  
16 stakeholders an update as to where we are on  
17 this initial phase of the implementation of  
18 the review of ancillary substances.

19 We are going to look at using  
20 microorganisms, one of our 2016 sunset  
21 materials as our guinea pig to test the  
22 process and see what we need to do to improve

1 or otherwise with that.

2 And then we'll move into the  
3 sunset 2015 materials, there's four of those.  
4 This will be the first of the scheduled two-  
5 part comment periods for use of the four  
6 materials. The first posting gives the  
7 subcommittee, in this case the Handling  
8 Subcommittee, an opportunity to pose  
9 additional and specific questions to either  
10 the stakeholders, the certifiers, or the  
11 original petitioner about the material that's  
12 now being -- beginning its required sunset  
13 review process.

14 With that I will turn it over to  
15 our -- our first material will be ammonium  
16 hydroxide.

17 Before we start on that I would  
18 like to say that the two proposals and the  
19 discussion document, we'll probably like to  
20 defer the voting until tomorrow.

21 And for the full Board's  
22 consideration we'd like to have good

1 discussion on this so we'll go over the public  
2 comment.

3 The subcommittee is considering  
4 referring these three proposals back to the  
5 subcommittee for further deliberation.

6 With that we'll have our lead on  
7 ammonium hydroxide.

8 CHAIR STONE: Lisa will start.

9 MEMBER AUSTIN: Lisa?

10 DR. BRINES: Thank you. The  
11 petition for ammonium hydroxide was submitted  
12 on November 2, 2012 from Dr. Richard Theurer.

13 The petition requests the addition  
14 of ammonium hydroxide to Section 205.605 of  
15 the National List as a synthetic substance for  
16 handling and processing.

17 There are some background  
18 materials available from a previous review of  
19 this substance when it was petitioned in 2000  
20 so the subcommittee was able to use that  
21 previous technical report from 2001 to assist  
22 in its review. Thanks.

1                   MEMBER AUSTIN: Jean is our lead  
2 reviewer on this.

3                   MEMBER RICHARDSON: Thank you.  
4 There's quite a bit to say about ammonium  
5 hydroxide. Just to be sure we have it in the  
6 record and in order for us to be able to  
7 discuss it fully I will be giving quite a bit  
8 on the background of this material.

9                   Ammonium hydroxide is a strong  
10 alkali and used as a boiler additive to  
11 prevent boiler and pipe corrosion by reducing  
12 the pH to 8.509 and neutralizing carbonic  
13 acid.

14                   It's manufactured from natural  
15 gas, synthetic -- the natural gas which is  
16 used to convert atmospheric nitrogen to  
17 ammonia to which water is added. It is toxic  
18 by all routes.

19                   In terms of the actual background,  
20 the history of this material, in the NOSB  
21 Organic Good Manufacturing Practices of 1995  
22 did not include boiler additives.

1                   In 2001 ammonium hydroxide was  
2                   petitioned for addition to the National List  
3                   and there was a TEP review which was actually  
4                   quite a lengthy one. And attached to it were  
5                   many appendices and a steam paper which  
6                   analyzes and compares all the boiler  
7                   additives. But that was in 2001. As you'll  
8                   see later we have some concerns as to its  
9                   modern day adequacy after public comment.

10                   This TEP review as done by OMRI  
11                   back in 2001 and it recommended prohibition of  
12                   ammonium hydroxide.

13                   And in August 2001 there was a  
14                   lengthy analysis submitted to the NOSB by Dr.  
15                   Theurer comparing all of boiler additives.

16                   The NOSB recommendation dated  
17                   October 2001 was to approve limited use of  
18                   three amine boiler additives which we'll also  
19                   get to in a minute, and to approve ammonium  
20                   hydroxide "for use as a boiler additive only  
21                   with removal from the National List October  
22                   21, 2005."

1                   And if the Office of General  
2                   Counsel says no to a shorter sunset date the  
3                   material will remain prohibited. And the vote  
4                   was 10 in favor, 3 abstentions and 1 no.

5                   I mention this because in the  
6                   final rule, the NOP dated September 2006 which  
7                   stated that most commenters wanted the  
8                   chemical included and some did not. However,  
9                   the expiration date recommended by the NOSB  
10                  had lapsed and therefore it was not added to  
11                  the list.

12                  Therefore in October 2012 Dr.  
13                  Theurer submitted this petition that Lisa has  
14                  just read into the record. It's a new  
15                  petition with appendices to add the ammonium  
16                  hydroxide to the National List "solely for use  
17                  as a boiler water additive to neutralize  
18                  carbon dioxide in steam condensate."

19                  The petitioner in his materials  
20                  suggests that the addition of ammonium  
21                  hydroxide as a boiler additive on the National  
22                  List would allow the eliminate of the three

1 synthetic volatile amines.

2 And as time went by and we got  
3 public comment and looked around we still  
4 don't really know whether that is correct or  
5 not. So, it is -- and we have not received  
6 further information that would clarify it as  
7 I'll get to when I talk in public comments in  
8 a few minutes.

9 So, right now the National List  
10 currently includes three volatile synthetic  
11 amines as boiler water additives. Here we go,  
12 I'll read them out: cyclohexylamine,  
13 diethylaminoethanol and two neutralizing  
14 amines, and octadecyclamine, a filming amine.  
15 The pronunciation is more or less correct.

16 It should be noted that these  
17 three amines are only for packaging  
18 sterilization. They're not for broad use.  
19 The present petition is for somewhat broader  
20 use and it may get into culinary steam. I'll  
21 get to that in a minute too.

22 The petitioner indicates that

1 ammonium hydroxide is a direct food substance  
2 affirmed by the FDA is generally recognized as  
3 safe, grass, for what, you know. And again,  
4 as Jay mentioned this morning, that's  
5 something for us to consider just as one of  
6 the criteria or pieces of information.

7           The petitioner indicates that the  
8 form of ammonium hydroxide in the steam  
9 condensate itself is actually ammonium  
10 carbonate and states that the substance  
11 ammonium carbonate is currently on the  
12 National List.

13           However, it should be noted that  
14 ammonium carbonate and ammonium bicarbonate  
15 are on the National List only for use as  
16 leavening agents.

17           In contrast, the three synthetic  
18 amines retain their identity in the steam  
19 condensate and thus persist into the processed  
20 food in their forms.

21           So we will of course look to  
22 essentiality, one of the criteria which we

1 must consider. And we found that when we  
2 first did this back when John was chairing  
3 this Handling Committee last year we discussed  
4 and noted that there are many different  
5 alternatives for ammonium hydroxide.

6           And I'll read them out because  
7 there are a lot of them that we need to really  
8 be thinking about as we look at these and the  
9 other boiler additives. Stainless steel  
10 piping. Treatment of incoming water to  
11 soften, filter and purify. Physical and  
12 chemical deaeration, interrupt your boiler  
13 water treatment before the organic processing,  
14 bleed runs, blowdowns, dismantle the system  
15 and clean before organic runs, steam-to-steam  
16 heat exchangers, secondary boiler steam for  
17 direct food contact application. So there's  
18 a lot of management things that could be done  
19 which would make this non-essential for the  
20 intent that the petitioner was asking for.

21           And therefore the subcommittee  
22 voted in February of 2013 -- 2013, note -- for

1 yes - zero, no - 6, absent - 2 and there were  
2 no abstentions or recusal.

3 Then the fall meeting was canceled  
4 and we did have some public input which I'll  
5 get to in a second.

6 So in February 2014 the newly  
7 revised subcommittee under Harold's leadership  
8 revised the proposal to go out to the public  
9 seeking further public comment regarding  
10 essentiality of ammonium hydroxide especially  
11 in light of the upcoming 2016 sunset review  
12 for the three amines.

13 And the public comment were  
14 received both in the fall of 2013 and spring  
15 2014 from several commenters including the  
16 petitioner.

17 The majority of the public  
18 comments such as Consumers Union, Beyond  
19 Pesticides and individuals recommended not  
20 adding ammonium hydroxide to the National  
21 List.

22 The petitioner provided written

1 comment raising broader issues related to the  
2 use of chloramines in drinking water and  
3 states that we the NOSB "have failed to  
4 distinguish between manageable hazards of  
5 ammonium hydroxide added to a boiler in a  
6 factory and the absence of any risk created by  
7 consumption of a food product containing a few  
8 parts per million of ammonium carbonate  
9 contributed by the condensate water."

10           However, the petitioner did not  
11 provide us with -- we're still unaware of  
12 which producers out there, which handlers,  
13 which processors, which people want this  
14 material as a boiler additive. So we don't  
15 have that information yet.

16           And also, Dr. Theurer still has  
17 failed to help us to fully understand the full  
18 range of uses of this material in the culinary  
19 steam uses that may come into play if there is  
20 any suggestion that this could be used, that  
21 the ammonium hydroxide could be used to  
22 replace the three amines.

1                   So, while there doesn't appear to  
2                   be a demand for this chemical there are many  
3                   alternatives. We're presently thinking in the  
4                   subcommittee that it might be more sensible  
5                   for us to send this back to the subcommittee  
6                   in order to really be able to analyze this  
7                   boiler additive along with the sunset boiler  
8                   additives as a group.

9                   And I especially want to thank  
10                  Cornucopia for providing us a little bit of  
11                  additional data as part of the public comment  
12                  which they've supplied to us for PGME which  
13                  I'll get to later where as you heard in the  
14                  public comment yesterday they did some quick  
15                  research for us to find out if they knew who  
16                  was using as range of boiler additives  
17                  including the three amines.

18                  And this is already part of the  
19                  public record. I won't go into it in any more  
20                  detail here.

21                  But again, it raises some concerns  
22                  that we probably should be looking at all of

1 these boiler additives with perhaps some more  
2 information and look at them as a group so  
3 that we don't inadvertently vote no on a  
4 boiler additive when in fact it could be used  
5 to replace things that are more toxic.

6 And those ones that are more toxic  
7 are the ones that are coming up for sunset.  
8 So probably I would be, Harold, recommending  
9 that we send these back to the subcommittee to  
10 be looked at together for the four. So that's  
11 our report.

12 MEMBER AUSTIN: Thank you, Jean.  
13 And that's kind of part of what I was alluding  
14 to when we started was that we'd like to defer  
15 the voting on these till tomorrow.

16 And that's probably going to be  
17 our subcommittee recommendation to the Board  
18 will be to refer these back to committee so  
19 that we can group them, take a better look at  
20 them as a whole group rather than this one  
21 particular product. Since we know we have the  
22 other three amines coming up on 2016.

1 CHAIR STONE: Are there others  
2 who'd like to weigh in at this point?  
3 Colehour?

4 MEMBER BONDERA: Thank you. I  
5 actually frankly don't want to talk about this  
6 but I want to just site a minor error in the  
7 document which reports on the listing motion  
8 that it was seconded by Colehour Bondera who  
9 does not serve on the Handling Committee.

10 So I just want to make sure that  
11 everybody in their record for the sake of  
12 review knows that for whatever reason, if you  
13 do or don't want to know that, my  
14 understanding is it was Carmela Beck who  
15 seconded that last year. But in any case,  
16 slight correction.

17 MEMBER RICHARDSON: It's the  
18 initials that do it.

19 VICE CHAIR FOSTER: We'd be happy  
20 to adopt you.

21 CHAIR STONE: Yes, just for the  
22 audience in the minutes and whatnot, in our

1 correspondence there is CBO which is Colehour  
2 Bondera and CBE which is Carmela Beck. So I  
3 assume that's what happened in translation  
4 there. But thank you for pointing that out  
5 for the official document here. Jay?

6 MEMBER FELDMAN: Thank you. Thank  
7 you for that thorough report. Jean, do we  
8 know who Dr. Theurer represents? Does he have  
9 a client for this petition?

10 MEMBER RICHARDSON: No, my  
11 understanding he does not have a specific  
12 client. In fact, his public comment, the  
13 written form that came in and the other  
14 materials list him as an independent person.  
15 But obviously he does have people that he's  
16 working with but they're not specifically  
17 mentioned in this, no.

18 MEMBER FELDMAN: Thank you.

19 CHAIR STONE: Melissa?

20 DR. BAILEY: Thanks, Mac. Yes, I  
21 think that makes a lot of sense. I think  
22 where the subcommittee is going with this to

1 consider it perhaps against the other three  
2 additives that are already on the National  
3 List. Because those three will be discussed  
4 at the fall meeting.

5 It seems like one possibility  
6 would be to have an expert panel or a few  
7 experts here on this particular subject area  
8 if that would be helpful for those  
9 deliberations.

10 CHAIR STONE: Jay?

11 MEMBER FELDMAN: Just  
12 clarification on the process. The three  
13 amines are up for sunset so that will be the  
14 first meeting on the amines. But would be  
15 expect to be voting on the ammonium hydroxide  
16 at the fall meeting?

17 DR. BAILEY: I think that would be  
18 up to the subcommittee.

19 CHAIR STONE: It depends on where  
20 they are on their information stream leading  
21 up to that meeting. Jay?

22 MEMBER FELDMAN: On that point

1 then, it seems to me if I understood your  
2 presentation correctly it would be good to  
3 have all the information assembled on all four  
4 materials so that when voting whoever's voting  
5 at that time has an understanding of how they  
6 relate to each other and what action will be  
7 taken.

8 CHAIR STONE: Jean?

9 MEMBER RICHARDSON: Yes, I agree  
10 with you, Jay. I think that especially since  
11 we haven't noted a demand for this. I mean,  
12 we've had no company that says this is  
13 essential, this ammonium hydroxide, we really  
14 want it now. We haven't seen any demand for  
15 that.

16 So I don't think delaying this  
17 until the spring of next year when we'll be  
18 looking at the amines, I don't think that  
19 that's going to be an issue.

20 But certainly we could put it on  
21 the fall agenda at least for an update. When  
22 we're doing the sunset of the others we'll be

1 sure to bring it up at the same time so that  
2 people can see that we're still trying to  
3 accumulate all the appropriate information to  
4 come up with a good decision.

5 CHAIR STONE: Harold?

6 MEMBER AUSTIN: Yes, Jay. I think  
7 that if you look at the listing motion the  
8 subcommittee actually was zero yes and 6 no on  
9 this proposal to move it forward for listing.

10 But based off of public comments  
11 in the fall and then again this spring we  
12 decided that some of the points that have been  
13 raised are valid and if we can take a look at  
14 the boiler group collectively as a whole, and  
15 if there's a possibility that we could remove  
16 three toxic amines off of the list of approved  
17 materials and replace it with one material  
18 that's a solid move and it's a move in the  
19 right direction.

20 So we want to make sure we get it  
21 right. So we're going to take our time and  
22 we're going to make sure that this one's done

1 properly. And that's the whole purpose of  
2 what we're trying to accomplish now.

3 CHAIR STONE: And Jean made  
4 reference I remember on one of the calls some  
5 is just boilers. There's no food contact.  
6 Some there's packaging contact. And then  
7 there's culinary steam. So that's that sort  
8 of overlay of three different uses much less  
9 four different materials. So there's kind of  
10 a matrix to be built there I guess in that.

11 Anything else from the Board?

12 Very good. Thank you, Harold. Next up?

13 MEMBER AUSTIN: Okay, our next  
14 material is glycerin. Lisa, you can lead us  
15 off. Tracy is the lead reviewer on that.

16 DR. BRINES: Okay. Thanks,  
17 Harold. The petition for glycerin was  
18 submitted on January 4, 2013 by Draco Natural  
19 Products. The petitioner requests the removal  
20 of glycerin from Section 205.605(b) of the  
21 National List.

22 The current listing reads,

1 "Glycerin produced by hydrolysis of fats and  
2 oils."

3 There is one additional listing  
4 for glycerin on the National List under an  
5 alternate spelling with an E at the end.  
6 That's on 205.603, an allowance in organic  
7 livestock production as a teat dip.

8 That particular allowance is not  
9 within the scope of this petition. The  
10 removal is just requesting the committee  
11 address 205.605.

12 In support of its review the  
13 Handling Subcommittee did request the  
14 development of a third party technical  
15 evaluation report. That report was completed  
16 in 2013 and is posted on the NOP website.  
17 Thanks.

18 MEMBER AUSTIN: Tracy, go ahead.

19 MEMBER FAVRE: Thanks, Harold.

20 Okay, so at first blush this looked like a  
21 fairly straightforward petition. They've  
22 requested to remove it from 205.605(b) with

1 the assertion that there is sufficient  
2 quantity of organic glycerin. So, in our  
3 efforts for continuous improvement we should  
4 consider removal.

5 When we put the proposal together  
6 we did actually have this proposed for the  
7 fall meeting as Lisa said and put in a request  
8 specifically because we understand that  
9 glycerin is used in a wide variety of  
10 products. We wanted to get some feedback on  
11 what the potential impact would be on the  
12 industry should it be removed.

13 So under the classification of be  
14 careful what you ask for we've gotten some  
15 feedback that appears to make this a lot more  
16 complicated than we first thought.

17 So, initially the intent after the  
18 review of the TR and the past materials was  
19 for a recommendation from the subcommittee to  
20 remove glycerin as currently listed. For the  
21 reasons that -- it did seem as though there  
22 was sufficient quantity of organic glycerin

1 available.

2                   However, again referring to the  
3 public comments, because there is some  
4 confusion about the classification of  
5 glycerin, there is some draft material out  
6 there for classification of materials that  
7 would provide us some guidance, but it is a  
8 little confusing because there are multiple  
9 processes by which glycerin can be made. And  
10 in some cases it's considered organic --  
11 excuse me, it could be considered agricultural  
12 and in some cases it's considered synthetic.  
13 So that muddies the water.

14                   After looking at the potential  
15 impacts, particularly as it relates to natural  
16 flavorings and natural colors essentially --  
17 and that coupled with the confusion around the  
18 classification of glycerin we've decided as a  
19 committee generally that we are probably going  
20 to refer this back to committee to reassess  
21 based on the comments that we've received in  
22 public.

1 CHAIR STONE: Okay. Is there  
2 further input for the committee or this  
3 discussion? Okay, thank you. I think we did  
4 hear several different things yesterday and  
5 then in written as well. So rarely are things  
6 as simple as they appear. Okay, Harold?

7 MEMBER AUSTIN: Thanks, Mac. I  
8 think to go along with that I think it comes  
9 into play. Making sure that we make the right  
10 choices so that we don't negatively impact our  
11 organic community.

12 If we're not going to get it right  
13 we're going to pull it back and make sure that  
14 when we come forward with something that we do  
15 get it right based off of essentiality, trying  
16 to get our heads around the facts about the  
17 availability.

18 And about not just the  
19 availability of organic glycerin but it also  
20 boils down to is that organic glycerin an  
21 adequate substitute in the form that it is for  
22 what's currently being used as well. So

1 there's a lot of peripheral things that we  
2 need to take a look at and consider.

3 Plus the peripheral impact of this  
4 decision. So, Tracy. Mac.

5 MEMBER FAVRE: Yes, I just wanted  
6 to add I thought the remarks by Bill Wolf on  
7 Tuesday were indicative of some of the  
8 confusion around it where the original  
9 petitioner themselves has said wait a minute,  
10 we need to assess the impact of this and  
11 reconsider.

12 So, I think for me that was a  
13 compelling reason to go ahead and pull it back  
14 even though we'd already considered doing  
15 that.

16 MEMBER AUSTIN: Thanks, Tracy.  
17 Our next material to talk about will be  
18 polyalkylene glycol monobutyl ether.  
19 Actually, I already said that was just going  
20 to be PGME from now on.

21 So, Lisa, if you would go ahead  
22 and then Jean was the lead reviewer on this.

1                   MEMBER FAVRE: Sure. Thanks,  
2 Harold. The petition for PGME was submitted  
3 on December 27, 2012 by Pellet Products, Inc.  
4 The petition requests the addition of PGME to  
5 Section 205.605 of the National List as a  
6 boiler water additive.

7                   In support of its review the  
8 Handling Subcommittee did request the  
9 development of a technical evaluation report  
10 and that report was completed in 2013 and is  
11 posted on the NOP website.

12                   This petition is also an agenda  
13 item from the fall meeting that's moved  
14 forward from the canceled meeting and it is a  
15 discussion document that was reposted with no  
16 revisions. Thanks.

17                   MEMBER AUSTIN: Jean?

18                   MEMBER RICHARDSON: Thank you. I  
19 like boiler water additives, actually.  
20 They're quite interesting.

21                   All right. This boiler additive  
22 was an interesting one. We received the

1 information on this back in 2013. And as we  
2 looked at it, at the technical report we noted  
3 that the PGME is non-volatile and as far as we  
4 could tell from the technical report it  
5 remains in the boiler and does not come into  
6 direct contact with the processed organic  
7 products, in this case feed meal materials.

8           It's a very interesting material.  
9 It functions to reduce foaming during  
10 production of pelleted livestock feeds and  
11 also functions as a lubricant.

12           It has the unique property of  
13 inverse solubility such that it dissolves  
14 easily in cold water but at temperatures over  
15 104 which is cloud point it's completely  
16 insoluble.

17           So, PGME is not delivered with the  
18 steam but remains in the boiler as a  
19 precipitate until the cooler boils down below  
20 the cloud point and thus PGME does not come  
21 into contact with the feed. And it has  
22 extremely low toxicity. And there's all sorts

1 of other good things about it.

2           However, let's see, there are no  
3 natural sources of it, although there are --  
4 there are not many natural anti-foam  
5 chemicals. There are natural oils such as  
6 cottonseed, lard, sunflower, and so forth that  
7 are listed in the discussion document but very  
8 little data is available on these.

9           So, initially what the Handling  
10 Committee did was the normal thing. We  
11 developed a recommendation or a proposal based  
12 on the checklist and were voting that it would  
13 be okay based on our interpretation of the  
14 petition, the TR, the attachments and all the  
15 material that we had received. And as I say,  
16 it's a new TR that was done.

17           And then when the NOP saw that  
18 they determined that because there is  
19 apparently no contact of the PGME with the  
20 food material, in this case animal feed, that  
21 therefore it wasn't necessary for it to be  
22 petitioned to be on the National List.

1                   And so therefore they recommended  
2                   that we turn it into a discussion document and  
3                   that this is the discussion document that was  
4                   then posted ready for last fall. The document  
5                   was to seek public comment on this petition  
6                   and with the NOP notifying the petitioner that  
7                   they would have thought that PGME is not  
8                   eligible for petition to 205.605(b) because it  
9                   is not used in direct contact with organic  
10                  products.

11                  Then we got public comment. We  
12                  didn't get any public comment that I recall  
13                  from last fall. But since then with the re-  
14                  posting of this we got some very interesting  
15                  public comment.

16                  We got comment from Beyond  
17                  Pesticides, Cornucopia, OTA, NOC, Center for  
18                  Food Safety and one individual. Public  
19                  comment raised some very serious concerns that  
20                  the petition and the technical report  
21                  contained inaccuracies and inconsistencies.

22                  Beyond Pesticides, "believes that

1     although PGME is non-volatile contact with  
2     organic food is possible under this use  
3     through entrainment of water droplets and  
4     should be evaluated through the petition  
5     process for its appropriateness for use in  
6     organic production.

7             "PGME is made from highly toxic  
8     ethylene dioxide and the TR identifies  
9     alternative production practices that do not  
10    require an additive like PGME," end of quote.

11            Cornucopia states that, quote, the  
12    quality of the technical report does not  
13    provide sufficient information to evaluate  
14    PGME. They further state, quote, "The  
15    petition submitted by the manufacturer of the  
16    product containing PGME designed to be used in  
17    livestock feed mills states that the mode of  
18    action is through direct contact with the  
19    product," end of quote.

20            The TR, however, states that this  
21    does not occur, but the TR does not provide  
22    adequate citation for this assertion so that

1 it could then be independently verified.

2 Cornucopia further asserts that  
3 entrainment of water droplets is possible, and  
4 that the TR conflicts with the petition,  
5 raising the possibility of PGME being in  
6 contact with animal feed pellets.

7 The subcommittee then discussed  
8 these public comments received, both those  
9 submitted in writing as well as oral comment  
10 that we've heard. And we proposed that any  
11 decision on listing or not listing PGME should  
12 be deferred until we have more information  
13 both from the petitioner and a TR contractor.

14 And it should be noted that the  
15 petition is limited for use as a processing  
16 aid for livestock feed pellets. And it should  
17 also be -- and that this petition was  
18 initially sent to the Materials Subcommittee  
19 for feedback on whether the petition should be  
20 addressed in Livestock or Handling because OTA  
21 pointed out it was maybe in the wrong  
22 subcommittee.

1           But the Handling Subcommittee was  
2 assigned this petition and we worked with the  
3 Materials Subcommittee to keep them informed  
4 at the same time because the idea is to have  
5 them all -- sorry, the Handling Committee, so  
6 that the Handling Committee could really look  
7 at all of these boiler additives together.

8           So, I guess we don't want to  
9 petition right now, do we, Harold? We'll do  
10 that tomorrow. Okay.

11           So, I'd like, perhaps if I may,  
12 Jay, you had some other comments in Beyond  
13 Pesticides that I was hoping that you would  
14 also bring up in terms of the -- whether or  
15 not NOP should have just let us do the  
16 document or not. If you would please  
17 articulate those.

18           CHAIR STONE: Jay.

19           MEMBER FELDMAN: Sure, thank you.  
20 You know, this goes to the issue of  
21 production. I mean, production aids or issues  
22 related to processing where there may not be

1 -- it may not be a food contact substance  
2 which we believe it is because the TR actually  
3 identifies entrainment. But because of it  
4 being an input in the production process.

5 And so I don't know if that's a  
6 difference of interpretation of the law, or  
7 why the food contact substance issue would  
8 preclude an NOSB review. And so that's  
9 raised, as you point out, that's raised in the  
10 Beyond Pesticides comment.

11 I guess I don't have anything more  
12 to add on that. It just may be a straight up  
13 disagreement on interpreting the law.

14 But are there other examples I  
15 would ask of where food contact becomes the  
16 ultimate issue when the material is part of  
17 the production processing, production and/or  
18 processing of the end product that's labeled  
19 organic.

20 CHAIR STONE: Miles.

21 MR. MCEVOY: Yes, this is part of  
22 the reason why we bring these kinds of things

1 to the Board. Great discussion, great to have  
2 public input on this, on these complex issues.

3 The basic concept would be if the  
4 substance does not come into contact, does not  
5 by direct or indirect contact with the organic  
6 product that it's not really relevant to the  
7 organic system. So there's many things that  
8 are used in both production and handling that  
9 are outside the scope of the regulations.

10 For instance, if you had cleaning  
11 supplies for your bathroom that's used in the  
12 production facility or in the handling  
13 facility, not really relevant.

14 But this is a more interesting  
15 substance because the concept of entrainment,  
16 it certainly comes close. So that's why it  
17 should be evaluated very, very closely.

18 But there's areas I guess where  
19 there's going to be a clear line of yes,  
20 that's not relevant. We don't need to look at  
21 what they're using to clean their bathrooms,  
22 or what they're using in their kitchen.

1                   But if it's near the production or  
2 handling system, then it's certainly worth a  
3 careful look. And that's what inspectors and  
4 certifiers are doing when they're evaluating  
5 onsite, when they're doing their inspections  
6 they're evaluating all the substances that are  
7 being used to see if they have any possibility  
8 of commingling or contamination of the organic  
9 product.

10                   If it's being used in the handling  
11 of the organic product then it has to be an  
12 allowed substance.

13                   CHAIR STONE: Jay.

14                   MEMBER FELDMAN: And I guess that  
15 was the position we came down on which was a  
16 7 USC 6504 National Standards for Organic  
17 Production to be sold or labeled as an  
18 organically produced agricultural product.  
19 Under this title an agricultural product shall  
20 have been produced and handled without the use  
21 of synthetic chemicals except as otherwise  
22 provided.

1                   So it's that interpretation I  
2 would think is distinct from the management  
3 practices of the facility which do intersect  
4 especially with storage facilities with  
5 organic standards.

6                   But this is certainly a part of  
7 the handling and production of the product,  
8 the agricultural product.

9                   MR. MCEVOY: Right. And you have  
10 to think that there are many things that are  
11 used in a processing facility, for instance,  
12 that are looked at in the inspection process  
13 but are not looked at in terms of whether  
14 they're on the National List.

15                   For instance, there's a lot of  
16 equipment that has various lubricants that are  
17 used. And if during the evaluation of the  
18 system you determine that there's no potential  
19 contact or contamination of the organic  
20 products that it's not really relevant for  
21 review.

22                   You can think on a farming

1 operation there's a lot of mechanical  
2 equipment. There's the diesel or the gasoline  
3 that's used to run the equipment. Again,  
4 those things are not on the National List.  
5 So, it is challenging at times to determine  
6 where -- how far you go. But there's  
7 definitely an evaluation part of the process  
8 by the certifiers and inspectors.

9 CHAIR STONE: Francis?

10 MEMBER THICKE: Well, you could go  
11 ahead and go back and look at this material.  
12 I think you need to look a little more closely  
13 at the chemistry and make sure you've got a  
14 real chemical analysis. Because if something  
15 is completely soluble at low temperature I'm  
16 pretty skeptical that it's zero solubility at  
17 a high temperature. KSP doesn't go down to  
18 zero I don't think.

19 And also the vapor pressure. I  
20 mean, that's a little suspicious in my mind.  
21 It needs to be looked at I think.

22 CHAIR STONE: Okay, seeing no more

1 hands, going once, twice, okay. You good,  
2 Harold?

3 MEMBER AUSTIN: We're good. We  
4 appreciate the feedback. Okay, for those  
5 three materials we look to defer voting on  
6 those tomorrow.

7 Having said that we'll move onto  
8 our next topic which will be an update on  
9 ancillary substances given to us by Zea.

10 MEMBER SONNABEND: Okay, now that  
11 everyone is wide awake we can talk about one  
12 of our favorite subjects.

13 This is brief and quite informal.  
14 And I apologize to those of you who aren't  
15 into all that brevity stuff.

16 But as you all know what started  
17 out as other ingredients and now is known as  
18 ancillary substances are defined in our  
19 proposal that was passed in Portland as  
20 additives that are added during the  
21 manufacturing of a non-organic substance and  
22 not removed.

1           We did pass this as a proposal at  
2           our last meeting a year ago and we are  
3           operating under this proposal at least until  
4           we see the need to make changes to it. So  
5           we're going to try it out and see how it  
6           works.

7           As Harold mentioned our little  
8           test case, our first test case is going to be  
9           the microorganisms which are scheduled for a  
10          2016 sunset. And so that means that they will  
11          come for their first session before the Board  
12          at the next meeting, at the fall 2014 meeting.

13          A TR was done, an initial TR was  
14          done on microorganisms. Unfortunately it was  
15          commissioned before we had passed the  
16          ancillary substance proposal and so it did not  
17          include a full set of questions regarding  
18          ancillary substances the way we would like to  
19          have them covered.

20          And it also didn't include a few  
21          of the microorganisms that we need to look at,  
22          like fungi.

1                   So, we have developed a series of  
2                   questions to get another TR or a supplemental  
3                   TR done. They're not quite finalized yet but  
4                   we'll be going at our next -- by the time we  
5                   have another phone call we'll be going through  
6                   the subcommittee and onto Lisa to get the TR  
7                   underway.

8                   We are looking -- we have  
9                   identified, meanwhile, at least the beginning  
10                  of those functional classes of ancillaries  
11                  that will be in the microorganisms.

12                  And some of those ancillary  
13                  categories that we've come up with are anti-  
14                  caking agents and antioxidants, carriers and  
15                  fillers, what would be known as growth media  
16                  or substrate, preservatives and stabilizers.  
17                  And so those are a few of the groups we will  
18                  be looking at.

19                  We have developed a special  
20                  checklist that will -- for the ancillaries  
21                  that will -- or not checklist. Yes, I guess  
22                  checklist is the right form. That will go as

1 a secondary checklist along with the main  
2 checklist for the microorganisms.

3 The checklist will include the  
4 functional classes and the things we have  
5 reviewed so that once a proposal is through  
6 the ACAs and the others who care about this  
7 stuff can go after our meeting and just look  
8 at the one piece of paper and say okay, now we  
9 know which ancillaries are approved for this  
10 particular class of things and which ones may  
11 not be.

12 We will be having these go as a  
13 separate proposal. Right, Miles? A separate  
14 proposal for each meeting. So there will be  
15 a microorganisms proposal and then there will  
16 be an ancillary proposal for that thing?  
17 That's what I perceived is in the checklist  
18 that Emily gave us.

19 DR. BRINES: Yes, I think you were  
20 going to do them in sequence. That was the  
21 plan.

22 MEMBER SONNABEND: Yes, okay. So,

1 it will be very clear to everyone that we have  
2 reviewed the ancillary substances that go with  
3 each thing.

4 The checklist does address the key  
5 points that are in our evaluation criteria  
6 such as impacts in humans on the environment,  
7 essentiality, availability and comparability  
8 and consistency with organic handling.

9 And that's really my report.  
10 We'll see how it goes at the fall meeting.

11 Oh, I do want to put out the call  
12 well ahead of time to especially Pat and the  
13 certifiers in the room.

14 We would really like to start  
15 collecting spec sheets and see the spec sheets  
16 which will indicate what the ancillaries are  
17 for microorganisms.

18 If you could mention on the ACA  
19 listserv perhaps that if anyone has  
20 microorganism spec sheets they can either  
21 email them to me or Michelle or Emily Brown  
22 Rosen who I believe you have both of their

1 emails.

2 And same with any handlers in the  
3 room that would like to make sure that the  
4 ancillaries in their particular things are  
5 considered and reviewed. So that's my report,  
6 thanks.

7 CHAIR STONE: Zea, I spoke with  
8 Scott Rice who's the chair of the ACA board  
9 earlier today relative to our sunset  
10 conversation the other day.

11 And he has offered Pat. Pat, I  
12 didn't get a chance to talk to you about our  
13 conversation. Maybe Scott did.

14 But he offered that the ACAs would  
15 very much like to help get in front of sunset  
16 materials. And they can use brand names and  
17 get the word out to help us in our preliminary  
18 review for meeting 1 on sunsets. So this  
19 falls right in line with that.

20 So I feel sure they're welcome  
21 your advice and all of us to reach out to them  
22 as a group. Harold?

1                   MEMBER AUSTIN: Well, I think just  
2 to go along with Zea. So, as we go through  
3 the materials review process then we'll have  
4 the review for the material itself and then it  
5 will be followed with a supplemental review of  
6 the ancillary material. And that will be on  
7 a separate checklist. It won't be on the same  
8 materials checklist that we use for the other  
9 materials.

10                   MEMBER SONNABEND: Yes, although  
11 there are some questions on our regular  
12 checklist that also refer to ancillary  
13 substances. But probably more along the lines  
14 of which types of functional classes are used  
15 in this.

16                   CHAIR STONE: Okay, are there  
17 others on the Handling Committee want to fill  
18 in any gaps or details? Or if you're not on  
19 the Handling Committee questions for Zea or  
20 the Handling Committee. Lisa.

21                   DR. BRINES: Yes, just one  
22 clarification for those in the audience that

1        might be looking for that microorganisms  
2        technical report.  Since it's still under  
3        subcommittee review it hasn't been posted for  
4        the public yet.  But we will have that posted  
5        as soon as it's approved by the subcommittee.  
6        Thanks.

7                    CHAIR STONE:  Good.  Thanks, Lisa.  
8        Other questions or comments for the committee?  
9        Okay.

10                    Harold, we're scheduled for a  
11        break about now but I don't know if you want  
12        to run through your sunsets, how long you  
13        think that will take and we can break after  
14        that.  It's up to you.  I don't know how long  
15        you think we'll be.

16                    MEMBER AUSTIN:  What do our leads  
17        think?  Nick says we can go for it.  He's not  
18        even a lead.

19                    CHAIR STONE:  We came back a  
20        little late.

21                    MEMBER AUSTIN:  I think we'll be  
22        okay to move forward.

1 CHAIR STONE: We started a little  
2 late so actually it would be a cleaner break  
3 to work on through this if that's okay. Good,  
4 thank you.

5 MEMBER AUSTIN: Okay. We've got  
6 four 2015 materials up for sunset review. The  
7 first one will be gellan gum. Joe's the lead  
8 on that. Lisa, if you could -- are you --  
9 yes, you're going to read that, correct?

10 DR. BRINES: I believe all the  
11 information was posted online so I'm happy  
12 just to let Joe proceed if you'd like.

13 MEMBER AUSTIN: Okay. Joe, you  
14 ready?

15 MEMBER DICKSON: Yes, I'm ready.  
16 And just to confirm with you, Harold, as the  
17 chair this is our first sunset material under  
18 the new approach. I'm just going to kind of  
19 talk through the material in general and the  
20 process and summarize public comment.

21 MEMBER AUSTIN: I think so, Joe.  
22 I think we'll just kind of do an overview of

1 that's been posted. This is the first of two  
2 public reviews of that material.

3 And I think just maybe if we've  
4 gotten a little bit of feedback from the  
5 public comment we can talk about that right  
6 now. I think that would be the approach to  
7 take.

8 CHAIR STONE: Yes, I think so.  
9 And again, this is our trial balloon on this  
10 sunset and we're learning did we reach out  
11 well enough in this first meeting. But we'll  
12 go with where we are and learn as we go.

13 But I think all of us are  
14 dedicated to make this work and we'll go with  
15 where we are. Thanks, Joe.

16 MEMBER DICKSON: All right. The  
17 listing is for gellan gum, CAS no. 710-10-521,  
18 high acyl form only on 205.605(a) as a non-  
19 synthetic material.

20 Gellan gum is a polysaccharide gum  
21 produced as a fermentation product of a  
22 microbe called pseudomonas elodea.

1                   This bacterium produces a gum  
2                   which is used as a thickening agent in a  
3                   diverse array of food products including  
4                   bakery fillings, confections, dairy products  
5                   specifically, gels, frostings, icings and  
6                   glazes.

7                   It was petitioned for addition to  
8                   205.605(b) in 2004. In 2006 a technical  
9                   evaluation report was completed for the  
10                  Handling Committee which recommended its  
11                  addition to 605(b) in April of 2007.

12                  Following that a detailed  
13                  discussion among the Board, the program and  
14                  the petitioner at that meeting led to the  
15                  conclusion that it is in fact non-synthetic  
16                  and should have been added to 205.605(a).

17                  The Handling Committee made an  
18                  updated recommendation in 2007 and it was  
19                  passed by the full Board at the April 2008  
20                  meeting.

21                  The public comment we have  
22                  received on this material is overwhelmingly

1 supportive of re-listing.

2 One important thing to note is  
3 that the current listing is for gellan gum  
4 high-acyl only which is the non-synthetic form  
5 of the substance.

6 Two commenters, Beyond Pesticides  
7 and Cornucopia, noted that low-acyl gellan gum  
8 shouldn't be on 605(a) and it's not. And that  
9 wasn't made as clear as it could have been in  
10 the sunset recommendation so I wanted to  
11 clarify that.

12 The Hain Celestial Group, CP Kelco  
13 which is the manufacturer, QAI, CROPP, all  
14 confirm that the material is essential in the  
15 production of non-dairy beverages and other  
16 specific foods.

17 CHAIR STONE: Okay. Thank you,  
18 Joe. And Joe said we did have some written  
19 and public testimony on this one. Is there  
20 any questions for Joe or be sure that we reach  
21 out to the community? Zea?

22 MEMBER SONNABEND: I just want to

1 bring up one point that was raised in public  
2 comment that I think was a little  
3 misunderstood. And that was the perception  
4 that isopropyl alcohol was an ancillary  
5 substance in gellan gum when it is in fact a  
6 processing aid used in gellan gum. And so I  
7 think that is not under consideration as an  
8 ancillary substance.

9 CHAIR STONE: Jean?

10 MEMBER RICHARDSON: I'd be  
11 interested in hearing maybe, Wendy, the  
12 people, or Nick, people who are not on the  
13 Handling Subcommittee if you've had a chance  
14 to look at this and if you have an opinion  
15 based on some of the comments we heard  
16 yesterday how you see it going forward.

17 MEMBER MARAVELL: I'm speechless.

18 CHAIR STONE: Harold?

19 MEMBER AUSTIN: I think this was a  
20 good material to give us an example of the new  
21 sunset process, possibly how it's going to  
22 work, its strengths, its weaknesses. I think

1 we probably need to get a little bit more  
2 aggressive on the requests of specific  
3 information.

4           Because this is going to be I  
5 think the first listing of the material  
6 through the public comment is going to give  
7 the subcommittee working on those sunset  
8 reviews the highest level of ability of  
9 information to be able to come back then to  
10 the full Board and then the community and the  
11 stakeholders for discussion at this -- like  
12 for these four materials at this type of a  
13 meeting, the first round.

14           So, I think we got -- on gellan  
15 gum I think we got some pretty good feedback  
16 yesterday from several different sources.

17           I think one of the comments that I  
18 think stood out for me, and this goes back to  
19 my first meeting on the NOSB in Albuquerque.

20           And the review material that I got  
21 back then and this is a possible material that  
22 sounds like some of the handlers are beginning

1 to use as a replacement for carrageenan. So  
2 it shows that the system's working.

3 It also shows that the industry  
4 and the stakeholders are listening to what  
5 takes place at these meetings. So it helps  
6 just to reinforce that the process is working  
7 if we help it and we give it the time and the  
8 ability to move forward.

9 CHAIR STONE: Okay, any other  
10 discussion? Thank you. Next up?

11 MEMBER AUSTIN: Next up will be  
12 Joe again with tragacanth gum.

13 MEMBER DICKSON: Thank you,  
14 Harold. Tragacanth gum is up for sunset on  
15 205.606 as a non-organic agricultural  
16 ingredient.

17 Of course, most of the discussion  
18 among the committee and the Board when it was  
19 originally listed centered around its  
20 commercial availability in organic form.

21 It is an exudate gum which is a  
22 category of gums that are minimally processed

1 and basically a sap that is extracted directly  
2 from the tree.

3 At the time of its listing the  
4 Board looked at the reasons for this material  
5 not being commercially available in organic  
6 form.

7 There was discussion that it was  
8 primarily cultivated in the Middle East  
9 particularly and Iran, and international trade  
10 issues had limited the availability of the  
11 supply.

12 At the time it was noted that  
13 Turkey was increasing its production of  
14 conventional tragacanth gum and also its  
15 organic production.

16 We have scoured the ingredient  
17 market and the whole internet and everywhere  
18 you might buy a gum and we were unable to find  
19 any evidence of organic gum tragacanth being  
20 available.

21 However, a few commenters did  
22 raise the question of whether gum Arabic,

1       which is now available in organic form, would  
2       serve as a suitable replacement for this  
3       material.

4                       That is a question I believe would  
5       be well answered by the current users of the  
6       material. I know that there is at least one  
7       candy product and one sauce on the market  
8       right now using this in its conventional form.

9                       QAI which I believe is the  
10       certifier for one or both of those companies  
11       did confirm that it's still in use. But our  
12       hope is that we are able to hear directly from  
13       those manufacturers as to whether gum Arabic  
14       is a suitable substitute and whether there is  
15       an organic form of this available and its  
16       ongoing necessity.

17                      That really sums up gum  
18       tragacanth.

19                      CHAIR STONE: Jay?

20                      MEMBER FELDMAN: So, how would we  
21       do that? I think you're raising good  
22       questions about getting information back from

1 the community on alternatives or essentiality.  
2 And you've already gotten some from QAI.

3 But the presumption is -- I mean,  
4 to me just hearing that doesn't sound like  
5 sufficient evidence of essentiality. We  
6 obviously have to maybe contact those folks  
7 and find out if the alternative would work.

8 But that's presumably going to  
9 happen between now and the next Board meeting.  
10 So, I guess if we publish -- if the  
11 subcommittee publishes something prior to the  
12 next Board meeting any new information that  
13 comes in as a result of that publication would  
14 be considered untimely and would have to --  
15 and if that were to influence the thinking of  
16 the subcommittee would have to go back to the  
17 subcommittee. Is there sufficient time to do  
18 that on a -- these are 2015 right? Sunsets.

19 CHAIR STONE: Yes, they are 2015.

20 MEMBER FELDMAN: Okay. So I'm  
21 just -- I mean, this is a classic example  
22 where getting essentiality information has

1 always been a tough thing for the Board. And  
2 the best essentiality information seems to  
3 come in during the course of generating public  
4 comments.

5 So, I suspect if the past is any  
6 indication of the future that we'll get some  
7 at least substantive comments after the  
8 publication of the subcommittee proposal for  
9 the fall meeting.

10 MEMBER DICKSON: Is your question  
11 will it be too late at that point to take  
12 action on that and change this recommendation?

13 MEMBER FELDMAN: Yes.

14 MEMBER DICKSON: Yes, that's a  
15 good question.

16 CHAIR STONE: Miles.

17 MR. MCEVOY: Well, if you have the  
18 proposal, if the subcommittee comes with a  
19 proposal to remove then that proposal would be  
20 on the table for consideration at the fall  
21 meeting with any new information that was  
22 provided between now and the fall meeting and

1 at the fall meeting. So that's why you may  
2 want to consider having that always as a  
3 possibility.

4 It also seems to be a way of  
5 encouraging input because, you know, people  
6 take that seriously.

7 Yes, the concept though is  
8 hopefully that -- the plan is to get as much  
9 information as possible at this meeting, the  
10 first meeting, that then helps to supplement  
11 that with additional information for the  
12 second meeting.

13 CHAIR STONE: Harold?

14 MEMBER AUSTIN: Jay, that was a  
15 valid point that you brought up. And I think  
16 looking at this process I think that going  
17 through the two-step process on sunset review  
18 like we're proposing to -- we are now  
19 implementing and we are now doing, I think  
20 that would probably be an indicator for us as  
21 for the subcommittees.

22 If we don't public comment back

1 from either the user or certifiers or the  
2 petitioner or somebody helping us to explain  
3 and substantiate what the essentiality is then  
4 I think then that would be the indicator for  
5 the subcommittee to then take and come forward  
6 with that type of a motion to de-list it.

7 And so I think that would be the  
8 message to send out. Once we're getting  
9 feedback on the first of the two meetings  
10 about essentiality and stuff, that kind of  
11 helps us to decide how to move forward or not  
12 to move forward.

13 But if we're hearing nothing back  
14 then I think that for me at least as the  
15 Handling Subcommittee chair would trigger our  
16 debate in the Handling Subcommittee that we  
17 would want to move forward with a motion to  
18 de-list for the fall meeting, or for the  
19 second meeting.

20 CHAIR STONE: Carmela?

21 MEMBER BECK: Yes, in my  
22 experience we've historically relied very

1 heavily on our certifier to provide us  
2 notifications about possible de-listings or  
3 things that we're talking about right now.

4 And so I think that from this time  
5 until the fall we could expect that certifiers  
6 would be the ones that might carry this and  
7 might help generate more information to come  
8 our way. And I'm not sure how that comes our  
9 way but so that it's not all in the fall at  
10 the public comment period. So, I don't know.

11 CHAIR STONE: And Scott and Pat,  
12 you may want to know the numbers are going to  
13 get quite big in the next year or so.

14 Anything else on this material?  
15 All right, thank you much. Harold?

16 MEMBER AUSTIN: All right, the  
17 third of our four materials, marsala. And our  
18 lead on that is Tracy.

19 MEMBER FAVRE: Thank you, Harold.  
20 Marsala or a fortified cooking line was  
21 originally petitioned in 2007 for addition to  
22 205.606 because it was considered a unique

1 flavor ingredient and was not commercially  
2 available as organic. This is for  
3 agricultural non-organic.

4 The use of marsala in organic  
5 products actually, after doing some informal  
6 research this applies almost equally between  
7 marsala and sherry which will be coming up  
8 next.

9 There was one particular  
10 petitioner that requested the ingredient or  
11 the material and doing some digging around we  
12 actually couldn't find that original  
13 petitioner.

14 I do understand since then that  
15 they're still in business but we haven't been  
16 able to actually get anybody to give us any  
17 feedback in regards to whether this material  
18 is still in use, whether there's still a need  
19 for it.

20 So, the initial proposal coming  
21 back from the initial analysis from the  
22 Handling Committee is that we would be

1 considering de-listing. So we brought it  
2 forth as part of the new sunset process to  
3 basically make that statement and request  
4 input.

5 The feedback on both marsala and  
6 sherry was generally that because it can be  
7 produced organically it should be removed as  
8 agricultural non-organic.

9 And as part of our research on  
10 these two materials we've talked to a producer  
11 who says it is possible to produce it and he's  
12 probably been requested information about  
13 production of organic marsala. But generally  
14 he is not producing it because there's not a  
15 demand for it.

16 And so it's a little bit of a  
17 chicken and the egg. It's hard for us to  
18 determine essentiality. It doesn't appear to  
19 be essentially in use or not in significant  
20 amounts. Even the original petitioner is  
21 difficult to find and track down. So for that  
22 reason we would recommend the de-listing.

1                   Generally the public comments were  
2 along the lines like I said of it's not  
3 organic. It can be produced organically which  
4 we have verified it can and should be de-  
5 listed. Thank you.

6                   CHAIR STONE: Thank you, Tracy.  
7 Questions? Comments? Harold?

8                   MEMBER AUSTIN: Yes. One of the  
9 things I think to point out to the full Board  
10 is with this first listing because we did have  
11 questions with marsala and then with sherry as  
12 Tracy will get into in just a moment, this was  
13 an opportunity for the subcommittee to reach  
14 out to the industry and the stakeholders and  
15 the users to ask very specific questions.

16                   And if you notice on marsala and  
17 sherry we did have three specific questions  
18 looking for stakeholder input and feedback.

19                   The first one was the Handling  
20 Subcommittee request that the public provide  
21 comment regarding commercial demand for  
22 marsala in organic comments and provide

1 comments on the impact that removing it from  
2 205.606 would have on the organic business or  
3 organic products.

4 The second question was has the  
5 industry attempted to locate organic sources  
6 of marsala and with what degree of success.

7 And then the third, are there  
8 other ingredients with suitable flavor  
9 profiles that would -- could be used in place  
10 of marsala given adequate transition time for  
11 the ingredient inventory and label depletion.

12 We got very, very little feedback  
13 if any at all as Tracy has alluded to. So I  
14 think this is a good example where this is  
15 probably a sunset material that the  
16 subcommittee will move forward with a  
17 recommendation to de-list come the fall.

18 CHAIR STONE: Proceed.

19 MEMBER AUSTIN: Okay, our fourth  
20 and final material is sherry. Tracy, you're  
21 up to bat again.

22 MEMBER FAVRE: Well, same song,

1 second verse. Sherry being agricultural non-  
2 organic, same issues. It's a fortified  
3 cooking wine. Again, originally petitioned  
4 for its unique flavor profile.

5 It was the same petitioner as for  
6 marsala, same investigation, same results  
7 essentially.

8 We did get some public comment  
9 along the lines from a couple of the  
10 certifiers that they think they may have a  
11 couple of clients who have this material in  
12 use.

13 And that -- but they aren't sure.  
14 Again, there doesn't seem to be a huge demand.  
15 Certainly there was no hue and outcry when we  
16 put it out there for feedback as to whether or  
17 not there was going to be an issue.

18 And maybe with the second  
19 opportunity we'll get some feedback,  
20 particularly if they hear from this meeting  
21 that we are heavily leaning towards de-  
22 listing.

1                   And the same three questions apply  
2                   that Harold read off. My apologies for not  
3                   catching those first go-around with the new  
4                   process. But anyway.

5                   And particularly the original  
6                   justification being the unique flavor profile.  
7                   If it's not being used and it's available  
8                   organically but not in demand there's really  
9                   no reason to leave it on the National List.  
10                  Thank you.

11                  CHAIR STONE: Okay. Any follow-  
12                  up? Committee members? Non-committee  
13                  members? Subcommittee? Nick?

14                  MEMBER MARAVELL: Yes, in the  
15                  interest of levity I'd like to make a full  
16                  disclosure here that I use marsala and sherry  
17                  in the non-organic form for a beef liver pate  
18                  which I use as a lead-in with restaurant  
19                  chefs.

20                  And many of whom would like me to  
21                  produce that commercially which I am not  
22                  doing.

1                   But after half a bottle -- I mean,  
2                   a tureen of that I've got them eating out of  
3                   my hand. They just love it.

4                   So, I may in the future have an  
5                   interest in marsala and sherry. But I thought  
6                   I would just indicate that for full  
7                   disclosure.

8                   CHAIR STONE: Thank you. Jay?

9                   MEMBER FELDMAN: Could the  
10                  gentleman from Maryland please explain why  
11                  he's not using organic forms of marsala and  
12                  sherry?

13                  MEMBER MARAVELL: I can't find  
14                  them.

15                  CHAIR STONE: Tracy?

16                  MEMBER FAVRE: I would only like  
17                  to remark that your comments officially on the  
18                  record along those lines might have been  
19                  helpful in our discussions. Thank you very  
20                  much.

21                  (Laughter)

22                  CHAIR STONE: Joe?

1                   MEMBER DICKSON: Tracy, when you  
2 say that -- I guess this is more on the  
3 marsala, but you also have it on sherry.

4                   When you're talking about there  
5 potentially being organic forms available are  
6 you talking made with organic grapes but with  
7 added sulfites? Or organic no-sulfite  
8 versions?

9                   MEMBER FAVRE: The indication that  
10 we received. Now, obviously this could be and  
11 should be and might be rather than is at the  
12 moment. But the indications are that it would  
13 be made with organic grapes without added  
14 sulfites.

15                   CHAIR STONE: Okay. Joe, you  
16 still look perplexed?

17                   MEMBER DICKSON: Yes, I am  
18 perplexed. Because then how would that impact  
19 its -- the argument for it going off of --  
20 being available in a made with organic form  
21 isn't the same as it being available in  
22 organic form. I guess is my perplexion.

1 CHAIR STONE: Well, we're glad we  
2 aired that out at the first meeting here.  
3 Harold, are we good?

4 MEMBER AUSTIN: Mac, that's all we  
5 have for the Handling Subcommittee.

6 CHAIR STONE: All right. Thank  
7 you all, that's great work.

8 And I just want to add a brief  
9 comment that obviously many folks in the  
10 broader community are bothered or concerned  
11 about the change in the sunset process. We  
12 hear stories about calling your legislator and  
13 calling lawyers and all sorts of things.

14 But this group has a  
15 responsibility to work with this new process  
16 and make it work the best we can. So, not  
17 only I but each of these Board members is  
18 seeking your all's help in making this process  
19 work, helping us make the process work to  
20 provide the best service that we can to the  
21 individuals, those 25,000 certified operations  
22 around the world that depend on us for this

1 process to work.

2 And frankly, really reaching out  
3 to you all to help us communicate and shorten  
4 that divide of our work and your all's need.  
5 So, please, and thank you for helping us get  
6 our work done.

7 So with that we'll take a little  
8 break. I've got 3:51 so let's say 10 after 4.  
9 Thank you.

10 (Whereupon, the foregoing matter  
11 went off the record at 3:51 p.m. and went back  
12 on the record at 4:13 p.m.)

13 CHAIR STONE: Okay, it looks like  
14 most of the Board is here pretty much. We've  
15 got some of the program here to make sure we  
16 don't cross any lines, get out of our lane.

17 So at this point it's the  
18 Materials Subcommittee. I'll turn it over to  
19 the chair, Mr. C. Reuben Walker.

20 SECRETARY WALKER: Thank you, Mr.  
21 Chair. We have four topics. First will be  
22 update of the petition and technical review

1 process which will be led by Zea.

2 Next we will have confidential  
3 business information and petitions, CBI, by  
4 the trumpeter, Dr. Thicke, Francis Thicke.

5 And John -- Dr. Thicke. The third  
6 proposal will be the fall 2013 research  
7 priorities. I will be giving that one. It  
8 was originally assigned to Zea but we know  
9 that Zea has a full plate on a lot of these  
10 subcommittees. So, a couple of weeks ago we  
11 wanted to lighten her workload since she made  
12 that request.

13 And Dr. Taylor, Jennifer was in  
14 France. And I ended up getting stuck in  
15 presenting this.

16 The same thing happened with  
17 George Bush, Jr., the younger one. Dick  
18 Cheney was the person over the VP search  
19 committee and he could not come up with a VP  
20 candidate. So Bush told him you're the one.  
21 So that's how Dick Cheney ended up being the  
22 Vice President for George Bush 43.

1                   And the last report will be given  
2 by Zea. It will be a written report on seed  
3 purity and GMO. And we'll start out with Zea.

4                   MEMBER SONNABEND: Thank you,  
5 Calvin. I just realized here that on the  
6 agenda for the Louisville meeting that was  
7 canceled I had requested that Michelle switch  
8 the order so that at least when we vote we  
9 need to vote on confidential business  
10 information first before we vote on updating  
11 the petition and process.

12                   And so we need -- I'll talk about  
13 this one now but when we vote we have to vote  
14 CBI first because it affects what happens in  
15 this proposal.

16                   So anyway, the NOP asked us to  
17 take up the issue of updating the petition and  
18 technical review process.

19                   We did that. We posted the  
20 document in the fall 2013 and again this time  
21 without changing it.

22                   We -- language was outdated in

1 there and there was a need to take a look at  
2 and modernize a bunch of the language. Now,  
3 even though there is a relatively recent  
4 change to have the Department be in charge of  
5 the policy manual, that change happened too  
6 late for us to reconsider this document. But  
7 essentially we're just -- the two parts, one  
8 of which are what will be in a Federal  
9 Register notice for petitions and the other  
10 part is the policies and procedures manual and  
11 they mirror each other. So really we are only  
12 voting -- probably voting the first part  
13 because whatever happens from the first part  
14 will end up in whatever the policy and  
15 procedures manual is.

16 We received very little public  
17 comment on any of the things other than the  
18 CBI portion which we'll cover in a minute.

19 Most people were favorable that  
20 did comment, especially in the fall we got a  
21 couple of comments with people who just said  
22 yes, these are good changes.

1           A particular one to highlight is  
2           that we streamlined the process for if you  
3           just want a petition to change an annotation  
4           so that you don't have to answer all 12 or 13  
5           questions, you just need to answer certain  
6           ones of them, about half of them or even a  
7           little less than half of them in order to  
8           change an annotation.

9           We also did add questions about  
10          ancillary substances when people are  
11          petitioning handling ingredients so that those  
12          come in at the same time hopefully to the  
13          extent possible. At least for that one  
14          petitioner.

15          But we do recognize that any  
16          petitioned generic substance may have other  
17          formulators who use other ancillary  
18          substances. And we'll still have to do work  
19          on finding out what those are.

20          So, I think that is pretty  
21          explanatory. If anyone has questions on this  
22          I guess we'll take them now and then we'll

1 talk about CBI and vote on that.

2 CHAIR STONE: Okay, are there  
3 questions or clarifications for Zea or others  
4 in the committee? Jay?

5 MEMBER FELDMAN: Thank you, Zea,  
6 for your work on this.

7 So in terms of the process we're  
8 not amending the PPM at this point. Do we  
9 have concurrence with the program that the  
10 changes that are being proposed here are  
11 acceptable?

12 CHAIR STONE: You have to say  
13 something, not just nod.

14 MEMBER SONNABEND: Before we  
15 posted it in the fall 2013 the Department had  
16 agreed to it, yes.

17 MR. MCEVOY: Yes.

18 MEMBER FELDMAN: Thank you.

19 CHAIR STONE: Any other thoughts?  
20 Questions? And I guess we've kind of got to  
21 tie this into the other one like you said.

22 Okay, let's proceed.

1                   MEMBER SONNABEND: I'm not the  
2                   lead on CBI.

3                   SECRETARY WALKER: Okay, next we  
4                   have Francis, CBI.

5                   MEMBER THICKE: Okay. And I may  
6                   need some help here because the CBI thing  
7                   started before I got on the Board. And I'm  
8                   summarizing the comments and the petition on  
9                   the proposal as I see it. Maybe -- if I don't  
10                  do it all maybe Zea can help me out.

11                  Basically the proposal is that  
12                  there are two possible recommendations. One  
13                  is that CBI not be allowed at all in  
14                  petitions. And the second one is that CBI be  
15                  allowed and it outlines the responsibilities  
16                  of the various stakeholders, of the NOP, the  
17                  petitioners and NOSB.

18                  And the subcommittee voted for  
19                  number one, that no CBI be allowed 7 to zero.

20                  Now, just to clarify that. That  
21                  doesn't mean that the petitioners have to give  
22                  their exact recipes of such. But we need to

1 have enough information to know -- to be able  
2 to evaluate the materials and to see what  
3 effect they may have on health, human health  
4 or the environment. So that's an important  
5 distinction to keep in mind.

6 And as far as the comments go,  
7 there were comments both last fall and this  
8 year and a total of about 11 between the two  
9 times. And there may be a few more in favor  
10 of the position of the subcommittee of no CBI.

11 However, Hain Celestial and OTA  
12 had strong objections to that, thinking that  
13 there needs to be some CBI to allow keeping  
14 proprietary information private. So that's  
15 the basics.

16 CHAIR STONE: Okay. Do others on  
17 the committee want to add anything or clarify  
18 that point? Zea?

19 MEMBER SONNABEND: Yes. As a  
20 person who's read a lot of petitions and a lot  
21 of TRs it just keeps coming up time and time  
22 again specifically about manufacturing

1 processes. How can you tell if something is  
2 synthetic or non-synthetic without knowing the  
3 manufacturing process?

4 And times when we have turned this  
5 over to the TR contractor because it was CBI  
6 and they could look at it and we wouldn't look  
7 at it, they don't really have the best track  
8 record of getting what we mean when we say  
9 synthetic or non-synthetic.

10 And for instance, vinasse we had  
11 to send back like three times before they even  
12 understood what distinction we were trying to  
13 make between synthetic and non-synthetic.

14 And so I just keep asking myself  
15 the question of can I trust what a TR says  
16 based on CBI and whether it's synthetic or  
17 non-synthetic. And I had to say to myself no,  
18 I cannot trust that.

19 However, I do feel that this does  
20 not mean that companies have to turn in all  
21 their confidential formulas and confidential  
22 recipes. You can just leave it out of the

1 petition and only turn in, you know, saying  
2 things like this patent covers things that are  
3 in our manufacturing process and give the  
4 patent reference number and leave the exact  
5 formula out.

6 And if what the patent says is  
7 true and can be verified by the TR then that  
8 covers it.

9 But I do feel that we need to be  
10 able to know whether things are made with a  
11 synthetic or a non-synthetic process. And I  
12 believe the Department feels the same because  
13 they asked us to consider this opinion in the  
14 first place.

15 CHAIR STONE: Okay. Questions?  
16 Thoughts? Lisa?

17 DR. BRINES: Thanks, Mac. Yes, we  
18 agree with Zea that we do support the proposal  
19 to eliminate the CBI option. It's been a  
20 problem periodically with certain petitions  
21 even when those petitions meet the guidelines  
22 in the current petition guidelines.

1                   So we think that eliminating this  
2 option will alleviate the NOP's need to manage  
3 that information.

4                   The CBI information that does get  
5 submitted to the program really doesn't seem  
6 to be serving any practical purpose and it's  
7 not available to the Board or the public. So,  
8 just in the interest of transparency we'd like  
9 to see that option removed from the petition  
10 process. Thanks.

11                   CHAIR STONE: Miles?

12                   MR. MCEVOY: Yes, I just want to  
13 add to that that, yes, it's been difficult to  
14 manage. We have petitioners that have  
15 submitted CBI to us and believe that because  
16 they do that that somehow we're going to be  
17 able to make a determination.

18                   Just, it's not for us to make the  
19 determination on the petition. It's for the  
20 Board to make that determination. So it puts  
21 -- it's a very awkward position. And the  
22 spirit of organics is to have this open to the

1 public and to have a transparent process. So  
2 it seems like keeping that information  
3 confidential is just not meeting the needs of  
4 the program or the public for full disclosure  
5 of the substances that are being considered  
6 for listing on the National List.

7 CHAIR STONE: John.

8 VICE CHAIR FOSTER: I'm not on the  
9 Materials Subcommittee. Could you  
10 characterize the discussion around what you  
11 expect, if any, impact to be on submission  
12 petitions if there is no CBI anymore? Was  
13 that part of the discussion? And if so, how  
14 would you characterize it?

15 CHAIR STONE: Zea? Yes, please,  
16 Zea.

17 MEMBER SONNABEND: I'm sure it  
18 probably will make the amount of petitions go  
19 down but I'm not sure how much lower it will  
20 than other factors in the organic community  
21 that are making petitions go way down.

22 But it's just -- once again, I

1 just feel like we have to be able to determine  
2 the process in order to evaluate the petition.

3 I will say just as a for instance  
4 a couple of meetings ago we reviewed lutein.  
5 And lutein -- I might not be saying it right,  
6 but it's made from marigolds originally.

7 And it is one thing I was really,  
8 really on the fence about. And this actual  
9 process with CBI. And if they had told the  
10 actual process so I actually knew this --  
11 could determine that the steps from marigold  
12 to lutein seemed compatible that would have  
13 made me vote for it.

14 But I voted against it because I  
15 didn't have the confidence that the TR that  
16 was done on it or the information provided by  
17 the manufacturer was sufficient for me to make  
18 that determination.

19 CHAIR STONE: John.

20 VICE CHAIR FOSTER: So, I get  
21 that. We've had that conversation, you and I,  
22 before.

1 I'm interested in the conversation  
2 that might have happened in the subcommittee  
3 context. I'm assuming it did, and if it did  
4 kind of what was the committee's kind of, you  
5 know, characterization about that.

6 CHAIR STONE: Francis.

7 MEMBER THICKE: Just the one piece  
8 that I'm more familiar with is that more often  
9 I've heard that those with CBI get turned down  
10 anyway. And so it's like it's a waste of  
11 effort and time for the petitioner and the  
12 Board. And so -- because such a high majority  
13 get turned down with CBI.

14 CHAIR STONE: Anything else?  
15 Anybody else? Okay, thank you. Oh, Harold,  
16 I'm sorry.

17 MEMBER AUSTIN: Yes. You know, I  
18 guess kind of along the lines where John's at  
19 it's been difficult as we review some of the  
20 petitions that do get submitted.

21 Because you'll get -- I've got one  
22 I'm working on right now and it's probably got

1 four or five pages of CBI information  
2 redacted. So, I mean you've got like nine  
3 pages, there's four or five of them that are  
4 just, they're blacked out. So, it does make  
5 it difficult on some petitions.

6 But I'm also a little bit  
7 concerned about where we take the process and  
8 the dialogue we have with those people that  
9 might in the future be wanting to submit a  
10 petition and what flexibility do we give them  
11 or allow them to protect their investment but  
12 yet provide us with enough information to make  
13 a solid determination.

14 And I think that's kind of where I  
15 think John and myself as well were wondering  
16 if that type of dialogue had taken place  
17 within the subcommittee to talk about those  
18 issues and how to move forward.

19 And I know you probably did by  
20 that but just kind of like hearing some of  
21 that information back from you guys I think  
22 would help the rest of us on the Board

1 depending on how we want to look at this.

2 CHAIR STONE: Jay.

3 MEMBER FELDMAN: Well, this is not  
4 a new discussion. I mean, the previous  
5 Materials Committee had discussed this in  
6 preparation for the Louisville meeting that  
7 didn't happen. So we're talking about over at  
8 least a year or more than that.

9 And I can tell you that when I was  
10 on the Materials Committee we discussed this.  
11 We discussed it with the program.

12 We did recognize that, first of  
13 all, the business community is used to  
14 producing product and utilizing protection  
15 under proprietary information protection in  
16 different statutes. I mean, pesticide  
17 manufacturers get that protection.

18 And so what Miles describes which  
19 is a commitment to transparency is unique as  
20 are other provisions or other means of doing  
21 business is unique to this law and the way  
22 it's implemented. So we recognize that that

1 was a part of the discussion.

2 I think it will take some  
3 manufacturers some getting used to. And a lot  
4 will reject that notion that they can subject  
5 what they have traditionally viewed as  
6 proprietary information to the public arena.

7 We have found in our organization  
8 that many of the claims of proprietary  
9 information are, you know, especially when it  
10 comes to ingredient materials, or those  
11 materials used in an extraction process, or  
12 whatever they're claiming as proprietary to  
13 the manufacturing is really understood by  
14 their competitors.

15 You know, these are often ways in  
16 which manufacturers try to claim a uniqueness  
17 in the market. But to their competitors what  
18 they're doing is pretty well understood. I'm  
19 not saying that's always the case, but it's  
20 very often the case.

21 So, the upside at least in the  
22 discussions we had when I was on the Materials

1 Subcommittee, the upside of maintaining a  
2 commitment to transparency, providing the  
3 Board all the information it needed to comply  
4 with the statute and generate sufficient  
5 information to make informed decisions, all of  
6 that outweighed what was -- what we understand  
7 to be the downside which, John, you've  
8 obviously identified as a potential downside.

9 I would say that over the long  
10 term if this doesn't work out and somehow  
11 people can identify where this is impeding the  
12 growth of organic, you know, or the organic  
13 brand then, you know, we would have to revisit  
14 this with the program. And maybe it will be  
15 a little bit difficult but establish a  
16 mechanism for protecting that data, protecting  
17 that information.

18 But the other element to all of  
19 this is that, and I'm not sure how it  
20 intersects, exactly, but we're dealing with  
21 generic materials. We're not dealing with  
22 brand name materials. So, I think the subset

1 that we're dealing with may be smaller than we  
2 typically see in the industry.

3 So that's the experience -- I'm  
4 just trying to explain the experience that I  
5 had as a part. It was thoroughly debated. We  
6 had a lot of input from the program, feedback,  
7 and you know, didn't come to this decision  
8 lightly.

9 CHAIR STONE: Calvin?

10 SECRETARY WALKER: I would like to  
11 share some of the concerns that John and  
12 Harold had talked about and how I was able to  
13 get over it.

14 In 2004 I was fortunate enough to  
15 get a patent. And sometimes when you do write  
16 grants or review them, they write back and ask  
17 for more detail.

18 And my first inclination is I  
19 don't really want to tell you all about my  
20 rinse process other than what's in the patent.  
21 Because when you write patents you tend to  
22 write it broad enough to give you broad

1 coverage to keep someone else from patenting  
2 over your patent.

3 So, but the way the committee  
4 handled CBI, Zea and the others, I would feel  
5 comfortable if a program was asking me for a  
6 little bit more information to make a decision  
7 about my product to be used.

8 But certainly I would have some  
9 questions. I wouldn't just say straight up  
10 yes. I would have some additional questions  
11 to ask them before I divulge anything that I  
12 thought that the reviewers were looking at it.

13 And we do know that reviewers are  
14 not always tight-lipped. And I've seen it  
15 happen. You know, people divulge your patent  
16 to their colleagues. So it is a problem.

17 But I think Zea said it. Some of  
18 the individuals may not file a petition but I  
19 think that the process that we have outlined,  
20 I think it would be okay for most people who  
21 are trying to conceal their trade secrets from  
22 the public.

1 CHAIR STONE: John?

2 VICE CHAIR FOSTER: I'll use this  
3 to kind of finish my thought.

4 My biggest concern is that -- I  
5 guess it's mostly in handling materials,  
6 generic ones, is that in the attempt to try  
7 and develop less objectionable synthetics,  
8 say, or non-synthetic versions of things that  
9 are now on the list as synthetic I'm guessing  
10 it will become increasingly popular as the  
11 marketplace expands for companies to want to  
12 develop those kinds of products.

13 And I think the nature of the  
14 business is that there's going to be more  
15 interesting and more esoteric methods used to  
16 create those novel products.

17 And what I don't want to do is  
18 establish a means that we could get better  
19 products on the National List, or even natural  
20 versions of things on the National List right  
21 now. Because I think developing those is  
22 going to require some really interesting

1 technology and processes. A lot of those are  
2 going to want to be tightly held.

3 So my concern isn't so much about  
4 growing the National List. It's finding  
5 better alternatives to things that are already  
6 there. That's my biggest concern.

7 So, I mean, if obviously the will  
8 of the Board is to move this way that's, you  
9 know, I get it. But I hope we have kind of  
10 our sights on the right things, or at least I  
11 think we do, is finding better things than we  
12 have right now.

13 And as long as we're not impeding  
14 that evolution I'm fine. But I wanted to get  
15 that out there. That's my intent.

16 CHAIR STONE: Zea.

17 MEMBER SONNABEND: I do share that  
18 concern, John. And I just think one of the  
19 impacts of this hopefully will be that  
20 companies who want a petition will think of  
21 creative ways to put in their petition with  
22 information that is sufficient for us to make

1 our determination.

2 Like, there's nothing wrong with  
3 them saying I make my stuff by putting it  
4 through a hydrolysis process with an enzyme  
5 followed by a centrifuge, followed by a  
6 fermentation process. And all of these  
7 processes are natural, but I don't want to  
8 give you my exact recipe.

9 And if that can then be verified  
10 by a TR then that could be a non-synthetic  
11 process and they've disclosed what they can  
12 without disclosing everything that's  
13 proprietary.

14 And that being said, I also want  
15 to make it clear that much as it's really  
16 annoying to do this for sunset I have no  
17 intention of asking for the CBI to be  
18 eliminated retroactively to the things that  
19 have already been reviewed.

20 That has come up a few times in  
21 the public comments but I just think those  
22 people joined the list on one set of rules and

1 those rules hold for them now that they're on  
2 the list.

3 CHAIR STONE: So, I have a  
4 question I guess for Lisa. So, how -- the  
5 redaction happens at your desk? Or how do you  
6 know what to redact? Or where does CBI get  
7 redacted?

8 DR. BRINES: Yes, as part of the  
9 petition guidelines it requires petitioners  
10 with CBI to submit two different versions of  
11 the petition. So the first version has the  
12 full information. The second copy of the  
13 petition, the petitioner has redacted that  
14 information such that it's supposed to be sort  
15 of a carbon copy of the first version but just  
16 with the removals. So we verify that the  
17 information that's redacted meets the  
18 guidelines for removing that information.

19 Oftentimes when petitions are  
20 determined to be incomplete it's because that  
21 specific provision of the petition guidelines  
22 has not been met. So it does create some

1 administrative -- it's a little bit time-  
2 consuming sometimes because petitioners don't  
3 always interpret that section correctly.

4 CHAIR STONE: And the TR  
5 contractors have the same confidentiality that  
6 you all have obviously. It's just when it  
7 comes into our public realm that it loses the  
8 control of that confidential.

9 DR. BRINES: Yes, that's right.  
10 We are able to send the confidential  
11 information to the contractor.

12 However, the contractor can't  
13 provide that information within the content of  
14 the report. So they can verify some things  
15 but it's of limited value even with that  
16 option.

17 CHAIR STONE: So, the contractor  
18 gets both versions as well.

19 DR. BRINES: We usually will start  
20 by sending them a link to the version that's  
21 redacted. If they need more information we  
22 can supply them with the confidential business

1 information.

2 CHAIR STONE: Okay, thanks.

3 Harold?

4 MEMBER AUSTIN: Would it then be  
5 possible to get a list of the problematic  
6 types of scenarios that the various  
7 subcommittees as we review these materials  
8 experience and then work a little bit more in  
9 detail with the contractors that are doing the  
10 TRs for us so that they can spend a little bit  
11 more time and energy to try to help wade  
12 through the weeds and pull that information,  
13 frame it a little bit better to where we've  
14 got a more clearer and better understanding of  
15 the information that's being presented to us.  
16 Rather than go through a full removal of CBI.

17 DR. BRINES: Yes, I think I see  
18 your point. I don't think that that would be  
19 the easiest solution to this problem.

20 I do think there is some burden on  
21 the petitioner who's submitting that  
22 information to disclose as much information as

1 they can.

2 A lot of times the information  
3 that is redacted is manufacturing information.  
4 Oftentimes they're re-purposing manufacturing  
5 information that was developed for another  
6 purpose.

7 It does have a level of detail  
8 that really is above and beyond what the Board  
9 generally needs to be able to make a  
10 classification decision or to evaluate the  
11 manufacturing process.

12 So I think oftentimes it's  
13 certainly possible to rephrase the  
14 manufacturing process in a way that describes  
15 it accurately and precisely to a general  
16 audience without the level of detail that they  
17 generally include.

18 CHAIR STONE: Zea.

19 MEMBER SONNABEND: You know, like  
20 I said, I've read a lot of petitions and TRs.

21 And the most egregious example I  
22 have to say, and I'm not going to name the

1 material because I can't even remember what it  
2 was, but we have one material on our list that  
3 not only was the manufacturing process  
4 redacted but I think it's question 4 where  
5 they ask for the effects on human health --  
6 human health effects from handling the  
7 material.

8 The entire question 4 was  
9 redacted. It said we have done studies on the  
10 effects of human health, black black black  
11 black. Blacked out for page after page after  
12 page.

13 So they sent it to the TR and the  
14 TR says yes, from the information provided by  
15 the manufacturer there seem to be no effects  
16 on human health. But with no outside  
17 verification other than that. And not telling  
18 us what studies were done.

19 So, how can you make a decision on  
20 that? But a former NOSB apparently did.

21 CHAIR STONE: Okay. I think that  
22 was a good discussion. We got a little more

1 background to how we got to where we are I  
2 guess.

3 Anything else there? No redacted  
4 comments in getting us to where we are? Okay.  
5 Okay.

6 Calvin, next up?

7 SECRETARY WALKER: Next up would  
8 be research priorities. This will be very  
9 quick. Jennifer, if you were here you would  
10 be doing this one but you were in France so  
11 you're fortunate.

12 This was sent out to the public.  
13 So it's placing on the PowerPoint. And it's  
14 probably of little use. You can't see it  
15 here. So I can at least read it.

16 This was what was sent out to the  
17 public that I believe 11 stakeholders  
18 responded to. A recommendation for -- let me  
19 just read it here.

20 As the introduction to what all of  
21 you that responded had a chance to see, one  
22 was a recommendation for a framework to set

1 resource priorities and was approved by the  
2 NOSB in May of 2012.

3 A part of the recommendation was  
4 to bring these -- do these priorities and  
5 deliberations and bring them back up at our  
6 fall meeting.

7 Three, I believe this was done by  
8 Zea and Jennifer that was handling this in  
9 those years. It was that each subcommittee  
10 was asked to give research priorities that  
11 they thought was needed for the things that  
12 they were dealing with. And these were  
13 actually submitted to the public for comment.

14 And some of the priorities for  
15 2013 was whole farm systems, alternatives for  
16 antibiotics including tetracycline,  
17 streptomycin for fire blight, evaluation of  
18 genetically modified vaccines, methionine  
19 alternatives, aquatic biodiversity, herd  
20 health, and so forth and so on.

21 What was not added, and this was  
22 taken from what was put out to the public for

1 commenting. The Livestock Committee and the  
2 Crop Committee inadvertently submitted their  
3 recommendations a little late and there were  
4 five items that want -- was chlorine  
5 alternatives, sulfuric acid alternatives,  
6 parasitism, mastitis and pneumonia.

7 What the subcommittee did, we  
8 voted on these. The motion was by Zea, second  
9 by Tracy and the vote was 5 to zero and two  
10 members of the subcommittee was absent.

11 Again, I apologize for the table.  
12 Public comment. For the fall there was 11 and  
13 100 percent supported the work done by Zea and  
14 Jennifer in leading this particular document.

15 What was interesting that I  
16 counted was that 89 percent not only said what  
17 was shared with them was okay, but 89 percent  
18 offered additional recommendations. I thought  
19 that was good, that the public weigh in and  
20 say what you have, we like that, but here's  
21 some of our recommendations. So I thought  
22 that that was a good way, Mac, to engage the

1 public.

2 In the spring of 2014 there was 10  
3 commenters. The research priorities by this  
4 Board are all approved. And 80 percent  
5 offered additional comments.

6 And this is where it goes into --  
7 we always say as a Board it is good to read  
8 the comments from the public. So we want the  
9 public to know that what you write and spend  
10 time on, we read it. We may not be able to  
11 respond to all of it but we do read for  
12 thousands or hundreds of pages.

13 Some of the entities that gave a  
14 response was OTA, the Organic Producers  
15 Wholesalers Coalition, Organic Seed Alliance,  
16 Consumers Union, Organic Center, Cornucopia,  
17 Beyond Pesticides, Center for Food Safety, and  
18 CCOF.

19 I'm just going to highlight a  
20 couple of from each of these organizations  
21 because they're taking time to write them and  
22 send them in so I think we should take time to

1 at least share with the rest of the Board what  
2 was said.

3 OTA which I thought was good as we  
4 talk about land grant. And it kind of ties  
5 into what Mark had mentioned.

6 OTA had said that research on seed  
7 quality should precede the determination of  
8 best stewardship practice. Education and  
9 outreach should be about these defined  
10 stewardship practices.

11 And for those of us who work at  
12 land grants, we know that research is not good  
13 just for research only. It needs to be a  
14 nexus to that. And that nexus is education  
15 and extension or which we call outreach. So  
16 I thought that that was good. So, that was  
17 one that was suggested by OTA.

18 Another one was that as we look at  
19 the issue of seed purity, and we are finding  
20 out today in talking to fellow Board members  
21 over lunch what happened today to get the  
22 feedback from the public that's so great is

1 that it was suggested that maybe a group of  
2 seed experts may be convened by NOSB at the  
3 next meeting. Maybe for a 30- or a 40-minute  
4 presentation. A dialogue on the next step  
5 with seed purity.

6           Going to the Organic Producers  
7 Wholesalers Coalition, three things. They  
8 gave four but for the sake of time. One they  
9 wanted to know was research to be done on the  
10 impact of consumers by organic apples', pears'  
11 availability and pricing.

12           And they mentioned, I believe they  
13 represent about 10 different businesses with  
14 a half a billion dollars in sale. So I think  
15 that when you almost have a billion dollars in  
16 sales and if there's something that we can do  
17 to help them see what is the next step since  
18 tetracycline is out and streptomycin is on the  
19 ropes, we don't know. So I think that we owe  
20 it to this group to continue to look at these  
21 things.

22           Another question that the Organic

1 Producers Wholesalers Coalition wanted to see  
2 was an analysis of the impact of organic  
3 apples and pears production based on current  
4 organic policy on antibiotics.

5 And I think Mark said something I  
6 thought was nice. We should not only be  
7 trying to engage NIFA but all of us come from  
8 a state that has a land grant institution.  
9 And they all at least have one ag economist.  
10 So this could be something for an ag economist  
11 to look at, at the data maybe to see how they  
12 can -- it wouldn't take a lot of research  
13 money.

14 Plant science research and animal  
15 science research take money, but agriculture  
16 economic data, there's many times it's all  
17 there, you've just got to compile it.

18 Okay, next if we move right along,  
19 Organic Seed Alliance. Two things here.  
20 Their interest for the Materials Committee as  
21 it relates to research priorities was  
22 approaches from leading organic seed market

1 demand without narrowing uniformity in our  
2 fields. That was a concern that they wanted  
3 to see something done about or addressed.

4 And another one was organic and  
5 the seed industry collaboration to identify  
6 and improve availability of germ plasm that  
7 was appropriate for organic seed production.

8 And the last thing they wanted to  
9 know was research done around the state of  
10 contamination of organic seeds.

11 Okay, National Organic Coalition.  
12 Biodegradable plastic mulch. And we heard a  
13 couple of days ago about insects, black  
14 soldier flies, other alternatives to deal with  
15 the methionine issue.

16 Okay, Consumers Union. And one  
17 thing I have noticed, that OTA, Consumers  
18 Union and PCC seem to do a number of surveys.  
19 And the Consumers Union offered to use their  
20 expertise on matters that relates -- let me go  
21 to that one here. Let me just skip to this  
22 one. I made a mistake. I had Consumers Union

1 twice. That was no bias, that was just an  
2 accident.

3 (Laughter)

4 SECRETARY WALKER: Consumers Union  
5 essentially said using scientifically valid  
6 research methods the National Research Center  
7 surveyed consumers about a wide range of  
8 topics.

9 The center essentially did over  
10 200 qualitative studies each year. They're  
11 very independent. So essentially what  
12 Consumers Union said, that they are available  
13 if we need to do surveys. And I'm sure that  
14 there are other organizations that have the  
15 research and expertise would try to do the  
16 same. But Consumers Union have offered to do  
17 these surveys for us. And I thought that was  
18 a very excellent gesture.

19 Okay, going back to the Organic  
20 Center. Another thing that they were really  
21 concerned about, I thought it was a good one,  
22 was the organic control of citrus greening.

1 And I think that's a big problem in the State  
2 of Florida. So I think that when we ask  
3 consumers and stakeholder groups.

4 GMO vaccines. CCOF has stated  
5 that they were willing to lend their expertise  
6 in helping us out. So, as we look with  
7 research priorities I think as Mark and others  
8 said we don't always need to go to NIFA USDA.  
9 We've got state agricultural experiment  
10 stations and we've got some of the  
11 organizations that are being represented here  
12 today have a wealth of information to help us  
13 address some of these issues.

14 And the research committee knows  
15 that we need to find a way to make this happen  
16 because many times the research we need takes  
17 20 and 30 years. So, if we set fire blight  
18 today those who deal with pears' health their  
19 issue is now. So by the time the research is  
20 done it's too late almost. So we need to find  
21 a path as a Board to how we can do research  
22 priorities where it's enough time to get

1 funding and get the research back.

2 And research for those who do not  
3 know generally take 10, 15 and 20 years or  
4 longer. It's not something you can always do  
5 in two years or three years.

6 So, in essence that's the nature  
7 of this report that I was presenting on behalf  
8 of Zea and the good work that Jennifer had  
9 done the year before.

10 So, as it relates to research  
11 priorities these were the ones that the  
12 subcommittees came up with along with yours.

13 And I would like to take to the  
14 subcommittee is that for those of you who give  
15 comments and offer good recommendations for  
16 research priorities I hope that this  
17 subcommittee would look at each one of them  
18 and in some way provide a response.

19 If you're taking the time to say  
20 citrus greening this should not be the end of  
21 that. At the next meeting we ought to be able  
22 to come back to you to say that the committee

1 talked about it, deliberated on it and we have  
2 made that a priority. And this is what we are  
3 attempting to do. As opposed to just a  
4 written document that goes nowhere. That's  
5 it.

6 CHAIR STONE: Okay. Anybody,  
7 questions, comments? And Mark handed out a  
8 handout. He has taken that to Organic Working  
9 Group, going deeper into USDA or broader. And  
10 I think again we need to thank Mark and Miles  
11 for institutionalizing the O word in the South  
12 and the North building. Nick?

13 MEMBER MARAVELL: Just a minor  
14 editorial correction on page 2 under  
15 methionine alternative. I suggest we strike  
16 the words in 205.207(5)(b) currently reads one  
17 former NOSB member stated in 205.237(5)(b) et  
18 cetera.

19 There's obviously been a mistake  
20 there. So NOSB member is quoted in the  
21 regulations.

22 CHAIR STONE: Okay, good catch.

1 Anything else here? Okay, very good. All  
2 right. Calvin, last on your list and last on  
3 our day on this subcommittee, a written report  
4 on seed purity and GMOs.

5 SECRETARY WALKER: This will be  
6 led again by Zea.

7 MEMBER SONNABEND: Okay. Thank  
8 you, Calvin.

9 We haven't been voting on the  
10 things that are votable on this committee so  
11 are we voting tomorrow on everything?

12 CHAIR STONE: I was going to ask  
13 Mr. Chairman if he wanted to vote on these  
14 today. We've got a little bit of time here if  
15 you so choose, or we can wait till tomorrow.  
16 It's up to Calvin.

17 MEMBER SONNABEND: Because this  
18 report is about 10 to 15 minutes long.

19 SECRETARY WALKER: I was going to  
20 defer to the person that was leading it. Do  
21 they want to bring it for a vote today.

22 CHAIR STONE: Why don't you run

1 through this and we'll see how everybody  
2 feels.

3 MEMBER SONNABEND: Okay. All  
4 right. So, as you all know we had a year-long  
5 process talking about seed purity from GMOs.

6 The results of that so far has  
7 been a report that you see posted on this  
8 occasion. I'm not going to rehash the whole  
9 report, but basically we had it out for public  
10 comment on two occasions. We analyzed all  
11 that public comment and arrived at the  
12 conclusion as a committee that we could not  
13 make a recommendation at this time, but that  
14 we would explore all the issues raised in  
15 public comment and present the public with  
16 where we stood on them in hopes that the  
17 public would write in with inspiration for us  
18 on what the next steps should be. And to try  
19 and keep this moving forward. And the whole  
20 issue of GMOs front and center before the  
21 Department, the public and the Secretary.

22 So, this is what we received for

1 this meeting. This is mostly divided into the  
2 same sections that the report is divided into  
3 with just a few key points singled out and  
4 then a little section at the end about  
5 research.

6 We received 12 substantive public  
7 comments. We also received a number of  
8 comments of citizens who just said label GMOs  
9 or no GMOs. I did not even count those but we  
10 will count them because they're good for  
11 ammunition in our future reports and things  
12 like that. But I'm going to mostly focus on  
13 the 12 of substantive.

14 And this is a lot of initials. By  
15 now most of you know these groups but I will  
16 name them off. And my typeface is a little  
17 bit bigger than Calvin's so you should be able  
18 to see most of it.

19 We got them from the National  
20 Organic Coalition, the Center for Food Safety,  
21 the Natural Organic Farmers Association, well  
22 NOFA. Northeast. Sorry, Jean. Organic Seed

1 Alliance, Organic Seed Growers and Organic  
2 Trade Association, CCOF California Certified  
3 Organic Farmers, CROPP Cooperative, and I'm  
4 not going to try to what CROPP stands for.  
5 Organic Produce Wholesalers Coalition, Beyond  
6 Pesticides and two individuals.

7 It's not a lot bigger than  
8 Calvin's but a little bit.

9 Okay, key points. And I've  
10 divided these into shared responsibility and  
11 achievability.

12 In our letter to the Secretary  
13 that we sent a couple of years ago we -- our  
14 main point was that the issue of GMOs had to  
15 be a shared responsibility between organic  
16 farmers and conventional farmers, and that  
17 organic farmers would do everything in their  
18 power to keep GMOs out of their production.

19 And we would certainly hope that  
20 conventional farmers and the makers of the  
21 pollution technology would do the same, keep  
22 things on their side of the fence. So this is

1 one step in that trajectory of showing that we  
2 are doing our share.

3 It was pointed out by several  
4 commenters including Beyond Pesticides while  
5 a seed purity standard is reasonable it's not  
6 reasonable to impose a standard in the absence  
7 of a comprehensive program both within organic  
8 agriculture and agriculture as practiced by  
9 those using genetic engineered varieties to  
10 prevent contamination of organic crops by  
11 genetically engineered crops, and to fine  
12 those responsible for the contamination.

13 We got -- now, I am singling out  
14 key comments here in these 12 comments, but  
15 several commenters would tend to be a bit  
16 redundant so I'm not repeating every single  
17 one.

18 CFS and NOC said something very  
19 similar as did OTA, that we need to have a  
20 more comprehensive guidance on best practices.

21 We were thinking of this at the  
22 same time our public was and so we have put in

1 the proposal and received the mandate from the  
2 NOP to work on organic prevention guidance  
3 practices.

4 And we can only hope that the  
5 other side of the USDA, the conventional side,  
6 is doing the same and looking at prevention  
7 guidance for conventional farmers to keep  
8 their GMOs in their fields. So this is a key  
9 point.

10 The second key point is a number  
11 of our commenters felt that this is achievable  
12 in the end, that a seed purity standard is  
13 achievable.

14 CROPP said we support the  
15 statement that change can only happen by  
16 speaking out and thank you for speaking out.  
17 You're welcome.

18 (Laughter)

19 MEMBER SONNABEND: OTA strongly  
20 encourages the Materials Committee to keep the  
21 discussion alive and take action now to keep  
22 GMOs out of organic agriculture.

1                   A seed purity standard if properly  
2 established would protect rather than burden  
3 farmers.

4                   CCOF thinks that a clear  
5 requirement for seed purity in 5 to 10 years  
6 is achievable and necessary, and it could be  
7 integrated into a certification process as  
8 other documentation and protocols that are  
9 already in place.

10                   Okay, now into the comments that  
11 were directly aligned with the sections of the  
12 report.

13                   People who did comment were in  
14 agreement that this would be a tool that would  
15 be consistent with a process standard. And  
16 that the non-detect standard proposed was a  
17 workable one for using if we were going to  
18 proceed with a recommendation.

19                   Next section was about data, about  
20 testing protocols and thresholds for  
21 rejection. OTA thinks that the lack of data  
22 is the most significant source of reluctance

1 to moving forward with this. They offered to  
2 help with aggregating and encouraging  
3 initiatives that will collect and present  
4 baseline data on seed purity.

5 And other people concurred that  
6 there is definitely a need for increased data  
7 collection and increased testing protocols.

8 It is an area that I hope we can  
9 work maybe with Mark before he leaves with  
10 institutionalizing how the data call goes  
11 through the Department so that we can make a  
12 more firm statement about what data we need  
13 and can gather from the Department and also  
14 industry. And I'm sure we'll be talking  
15 further about that as one of our next steps.

16 Okay, these are a little bit out  
17 of order. Just for the sake of making  
18 coherent slides.

19 The source material is  
20 unavailable. Both CROPP and OTA said  
21 substantial players in the seed industry have  
22 made it clear that the archive parent lines

1 owned by large seed houses of the U.S. are  
2 generally stored in archives clear of GMO  
3 genetic code and could be made available to  
4 breeders interested in clean versions of the  
5 parent lines.

6 This somewhat obscure statement is  
7 in contrast to what we heard in some of the  
8 public comment from those companies who use  
9 those lines, but we will want to investigate  
10 that more.

11 The concern about genetic  
12 diversity being decreased. CROPP addressed  
13 that through careful breeding isolation over  
14 the coming years a breeder could confidently  
15 select for seeds that retain lower and lower  
16 levels of unwanted genetics in exactly the  
17 same way they select for specific varietal  
18 genetics.

19 Well, this would be a good area to  
20 follow up more with the OSA suggestion that  
21 Calvin reiterated about having seed experts  
22 come speak to us at a future NOSB meeting

1 because this is clearly an area that we'd want  
2 to hear more about.

3 Okay, the issue of cost or expense  
4 for organic farmers, especially small-scale  
5 ones. The Organic Produce Wholesalers believe  
6 that the primary focus of NOSB recommendations  
7 should require the USDA to upholds its  
8 obligation to protect organic producers by  
9 preventing GE contamination and if it does  
10 occur establish compensation models.

11 Yet CCOF said we don't believe  
12 that it's practical or desirable to wait until  
13 the compensation mechanism from companies  
14 manufacturing transgenic crops is in place  
15 before implementing a genetic purity standard.

16 OSGATA commended us for  
17 recognizing the onus of contamination and  
18 concurs that it belongs with the patent  
19 holders and they need to be held accountable  
20 for their pollution.

21 Okay. Seed availability,  
22 especially organic seed. CROPP says they are

1 quite certain that there are a number of  
2 adequate seed suppliers who have access to  
3 adequate non-detect germ plasm and want to  
4 save the organic non-detect market.

5 That's great if it's, you know,  
6 but if they assert it we have to back that up  
7 with a little bit more investigation and data  
8 before we can go ahead.

9 Distinguishing between organic and  
10 conventional seed. OSA commented extensively  
11 on this. And these are just some excerpts.  
12 The strategy for favoring organic seed in  
13 general will take a comprehensive approach  
14 that includes better guidance for the NOP,  
15 stronger enforcement of the organic seed  
16 requirement, especially for minor uses of  
17 organic seed that don't -- minor users that  
18 don't demonstrate improvement. And an  
19 unintended consequence of any standard could  
20 be to encourage non-organic seed usage.

21 Also, the policy must address  
22 farmer saved seed which I had really not been

1 thinking were any different than any other  
2 seed but perhaps does need special  
3 consideration.

4 Okay. And the last point. It's  
5 the responsibility of the greater USDA, not  
6 just the NOP. I have two slides about this  
7 because everybody weighed in on this topic as  
8 you might imagine.

9 It's the duty of the National  
10 Organic Program to work with the USDA to  
11 ensure that organic is a protected form of  
12 agriculture because the USDA's mission is to  
13 ensure fair farming for all. So I believe  
14 they would like Miles and the program to go to  
15 bat for us against the rest of the USDA who  
16 doesn't really want to support organic.

17 (Laughter)

18 MEMBER SONNABEND: Home run,  
19 Miles. Come back and show us the ball.

20 (Laughter)

21 MEMBER SONNABEND: Okay. OSGATA  
22 disagrees with they call it our conclusion

1 that holding patent holders financially  
2 accountable as well as logistically  
3 responsible is outside of the scope of the NOP  
4 and USDA. This wasn't totally our conclusion  
5 but this is what is stated in the report.

6 The USDA statutory responsibility  
7 is to work on behalf of the welfare of all  
8 farmers for the U.S. which includes organic  
9 farmers.

10 The NOSB should be encouraged to  
11 call upon the NOP to take a more proactive  
12 role in advocating for GMO contamination  
13 prevention.

14 Okay, the next ones have to do  
15 with people who -- primarily OTA and Organic  
16 Seed Alliance who talk about the Plant  
17 Protection Act of 2000 which is what gives the  
18 underlying authority to the USDA to regulate  
19 crops produced through biotechnology and  
20 appears to be the root of the problem.

21 OSA had the very interesting  
22 comment which I am going to read verbatim

1 because I thought it was interesting. The PPA  
2 which is Plant Protection Act expands APHIS's  
3 authority to regulate noxious weeds, a  
4 category that more appropriately covers crops  
5 than plant pests.

6 The statute defines a noxious weed  
7 as any plant or plant product that can  
8 directly or indirectly injure or cause damage  
9 to crops, livestock, poultry, or other  
10 interests of agriculture, irrigation,  
11 navigation, the natural resources of the U.S.,  
12 the public health or the environment.

13 Clearly, based on this language  
14 USDA has sufficient statutory authority to  
15 issue regulations that address economic and  
16 other harms posed by GE crops.

17 So, I'm not sure we're going  
18 anywhere with this, but let it give everyone  
19 in the audience ideas if you'd like to pursue  
20 that.

21 Okay. A lot of people wrote in  
22 about research needs involved with all the

1 steps. And some of this is quite redundant to  
2 what Calvin's talked about so I'm not going to  
3 be talking about this at length.

4 But we appear to have, oh, not  
5 just 15 or 30 years but 100 years' worth of  
6 research ideas that we could do on GMO crops.  
7 We singled out two for our research priorities  
8 this year because they came up in discussion.  
9 But several slides here worth of more.

10 OTA suggested that the NOSB could  
11 create a research model to collect data. I'm  
12 not exactly sure what that means, a research  
13 model to collect data. So maybe they'll tell  
14 me more about that at some future time.

15  
16 But there is definitely a lack of  
17 data on how much contamination is occurring,  
18 whether that contamination is coming through  
19 the seed or through drift or handling  
20 practices. How contaminated is the seed  
21 supply now.

22 And then we also need research and

1 funding on methods to eliminate contamination  
2 from breeding lines and foundation seed.

3 And more topics on this slide  
4 which includes cost analysis of the financial  
5 burdens that would be placed on different  
6 organic stakeholders in the process of  
7 implementing it.

8 Now, I will say that some other  
9 groups besides these 12 commented on these  
10 same subjects for research priorities that  
11 Calvin summarized and not directly on the seed  
12 purity report.

13 Okay. A few other random stray  
14 comments.

15 Please leave the discussion of  
16 seed purity open until the committee has a  
17 recommendation ready for the USDA. That was  
18 one of our two individual comments.

19 OTA urges NOSB to include in the  
20 recommendation guidance that ACAs require a  
21 seed purity declaration made by the seed  
22 supplier of the non-GMO status of seed and as

1 Laura talked about on their bags.

2 The difference between commercial  
3 seed and farm-saved seed was brought up. And  
4 our other individual commented we should set  
5 fines for GMO crops drifting over and  
6 contaminating organic non-GMO crops.

7 So that concludes the report on  
8 seed purity. I think we have grist to talk  
9 about in the committee meetings on some  
10 possible next steps regarding research data  
11 and some other actions. And so we will take  
12 it from there. Thank you.

13 CHAIR STONE: Thank you very much,  
14 Zea, for compiling all that and the whole  
15 background to generate the information, to  
16 generate this is just tremendous, the effort  
17 you put in on that.

18 Are there others on the Board that  
19 would like to add to or ask questions or  
20 clarify? John?

21 VICE CHAIR FOSTER: I just want to  
22 say I think this is a great work product.

1 This is a lot of work and took a tremendous  
2 amount of effort and talent and knowledge.  
3 And I just wanted to acknowledge it. It's a  
4 really nice piece of work.

5 CHAIR STONE: Zea?

6 MEMBER SONNABEND: And I do want  
7 to acknowledge that this might have never been  
8 posted if the NOP hadn't agreed to work with  
9 us on it. Because we realize that it draws  
10 conclusions that are outside of their scope  
11 but they did agree to help us make it go  
12 forward as a report. So thank you to Melissa  
13 and Mark Lipson who helped substantially on  
14 this.

15 CHAIR STONE: Yes, I sense a lot  
16 of interest in the audience and heard some  
17 nice noises from them as you were unveiling  
18 some of that. Nick?

19 MEMBER MARAVELL: Yes, I'd just  
20 like to make a comment to help frame some of  
21 the issues surrounding compensation for GMO  
22 contamination. And the use of the concept of

1 irreparable harm.

2           Once you accept compensation for  
3 GMO contamination you no longer have access to  
4 irreparable harm arguments. And when you no  
5 longer have access to that, you no longer have  
6 access to certain forms of injunctive relief.

7           I don't want to get too  
8 complicated here but I'm just trying to tell  
9 you that once you go down the road of  
10 compensation you shut off a whole realm of  
11 legal argument to try and contain the  
12 activities of the patent holders.

13           So I feel that's more of a legal  
14 issue and this paper certainly is not a legal  
15 brief, it's a discussion of the substantive  
16 problems involved with the contamination.

17           But that is also why it is  
18 important to keep your eye on AC 21 and why  
19 you may have heard some questions about the AC  
20 21 committee here at this meeting.

21           CHAIR STONE: Any other thoughts?  
22 Comments? Okay. Mr. Chairman, Calvin, there

1       seemed to be a lot of consensus around the  
2       couple of voting. We've got 10 or 15 minutes.  
3       We've got quite a bit tomorrow as well. I'll  
4       leave it up to you but I might recommend we  
5       knock a couple of these out if that's  
6       favorable. Is that -- everybody? While these  
7       are still fresh on our minds. We obviously  
8       won't go backwards into the agenda.

9                   SECRETARY WALKER: Okay. Thank  
10       you, Mr. Chairman. Francis, you would like to  
11       take the bat on CBI?

12                   MEMBER THICKE: CBI? Since I have  
13       not done this before I'm not sure what I'm  
14       doing here.

15                   CHAIR STONE: So, if you'll read  
16       the motion and make a motion since you're the  
17       lead. And then we'll hopefully get a second.

18                   MEMBER THICKE: This isn't really  
19       a motion like it is in a proposal usually.  
20       Okay, so how about this. The Materials  
21       Subcommittee moves to accept recommendation  
22       number 1 in the proposal. And it's pretty

1 long. Do you want me to read it?

2 CHAIR STONE: Maybe not.

3 MEMBER THICKE: Okay.

4 MEMBER SONNABEND: Actually, I  
5 don't have it open this second. The sentence  
6 right above where it says that motion  
7 summarizes it in a much shorter form.

8 MEMBER THICKE: Okay, here we go,  
9 yes. Thank you, Zea. The Materials  
10 Subcommittee is recommending a revision to the  
11 material petition process to eliminate the  
12 provision for confidential business  
13 information.

14 CHAIR STONE: We have a motion.  
15 Is there a second?

16 MEMBER TAYLOR: I second.

17 CHAIR STONE: Second by Jennifer.  
18 Any further discussion? Okay. Hearing none,  
19 we'll proceed with the vote and we'll start  
20 with Jennifer.

21 MEMBER TAYLOR: Yes.

22 MEMBER FELDMAN: Yes.

1 MEMBER SONNABEND: Yes.

2 MEMBER AUSTIN: No.

3 CHAIR STONE: I'm not voting.

4 We're going a little bit slower so the tally-  
5 takers can keep up here too. John?

6 VICE CHAIR FOSTER: Yes.

7 SECRETARY WALKER: Yes.

8 MEMBER RICHARDSON: Yes.

9 MEMBER DICKSON: Yes.

10 MEMBER BECK: Yes.

11 MEMBER FAVRE: Yes.

12 MEMBER MARAVELL: Yes.

13 MEMBER FULWIDER: Yes.

14 MEMBER THICKE: Yes.

15 CHAIR STONE: The chair votes yes.

16 MEMBER BONDERA: Yes.

17 CHAIR STONE: Oh, I'm sorry. I  
18 forgot. I thought we started at the  
19 beginning. Sorry, Colehour.

20 So, we got 14 yes, 1 no. Thank  
21 you very much. So Zea, I think that motion  
22 carries. Remember, all chairs are rookies.

1 They have to get used to this thing.

2 So, Zea said that we needed to do  
3 that one first. So, Calvin?

4 SECRETARY WALKER: Next it would  
5 be a petitions and technical reviewing  
6 process. Zea?

7 MEMBER SONNABEND: The motion is  
8 to accept the proposal on updating the  
9 petition and TR process as described above and  
10 voted on on August 27, 2013.

11 CHAIR STONE: Which I would  
12 suggest is a lot of verbiage to make sure  
13 everyone is clear that it's above that in the  
14 document. Is there anyone that's not clear?

15 Is that okay, Melissa, entered  
16 into the record as such? Is there a second?

17 SECRETARY WALKER: I'll second.

18 CHAIR STONE: Second, Calvin. Any  
19 further discussion? Seeing none I'll proceed  
20 with the vote starting with Jay.

21 MEMBER FELDMAN: Yes.

22 MEMBER SONNABEND: Yes.

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MEMBER AUSTIN: Yes.

VICE CHAIR FOSTER: Yes.

SECRETARY WALKER: Yes.

MEMBER RICHARDSON: Yes.

MEMBER DICKSON: Yes.

MEMBER BECK: Yes.

MEMBER FAVRE: Yes.

MEMBER MARAVELL: Yes.

MEMBER FULWIDER: Yes.

MEMBER THICKE: Yes.

MEMBER BONDERA: Yes.

MEMBER TAYLOR: Yes.

CHAIR STONE: The chair votes yes.

We have 15 - 0, the motion passes. I notice Wendy a former secretary is down there busily making sure that we get it right. Thank you for that, Wendy. We can't get it out of you.

So, the last one to vote on would be the research priorities.

SECRETARY WALKER: Okay, this motion is a motion to adopt the proposed recommendation on NOSB research priorities for

1 2013.

2 CHAIR STONE: We have a motion.  
3 Is there a second?

4 MEMBER TAYLOR: I second.

5 CHAIR STONE: Who said that? I'm  
6 sorry. Jennifer. Okay. Any further  
7 discussion? Seeing none I'll begin the vote  
8 with Zea.

9 MEMBER SONNABEND: Yes.

10 MEMBER AUSTIN: Yes.

11 VICE CHAIR FOSTER: Yes.

12 SECRETARY WALKER: Yes.

13 MEMBER RICHARDSON: Yes.

14 MEMBER DICKSON: Yes.

15 MEMBER BECK: Yes.

16 MEMBER FAVRE: Yes.

17 MEMBER MARAVELL: Yes.

18 MEMBER FULWIDER: Yes.

19 MEMBER THICKE: Yes.

20 MEMBER BONDERA: Yes.

21 MEMBER TAYLOR: Yes.

22 MEMBER FELDMAN: Yes.

1                   CHAIR STONE: Vote 15 - 0. Motion  
2 passes. Thank you very much. And thank you  
3 for the great report or else we wouldn't have  
4 had that kind of quick and easy voting process  
5 here.

6                   So, in closing out, thank you, Mr.  
7 Chairman. Thank you for getting your work  
8 done.

9                   So, tomorrow I guess I want to  
10 visit with subcommittee chairs just a little  
11 bit. Be sure Michelle has the accurate list,  
12 that we know sort of which are being voted on,  
13 maybe which are being referred back to  
14 committee. We may affect the order of the  
15 vote so that we can maybe save time.

16                   Many of those that we think are  
17 being referred back to committee, we'll sort  
18 of maybe work through those to get warmed up,  
19 get our juices flowing tomorrow morning, and  
20 then save some of the others if there's more  
21 time for deliberation that might be needed.

22                   Any other thoughts or anything

1 that anyone wants to bring before we recess  
2 for the evening?

3 Thank you very much. We did a lot  
4 of great work today. We had a lot of great  
5 conversation. The conversation flowed nicely.  
6 I appreciate everyone's sharing of information  
7 and adding to our work. Thank you very much  
8 and we'll see you at 8:30 in the morning.

9 (Whereupon, the foregoing matter  
10 went off the record at 5:27 p.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

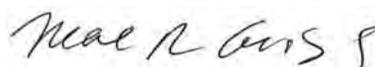
In the matter of: National Organic Standards Board

Before: Department of Agriculture

Date: 05-01-2014

Place: San Antonio, Texas

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

+ + + + +

MEETING OF THE NATIONAL ORGANIC  
STANDARDS BOARD (NOSB)

+ + + + +

FRIDAY  
MAY 2, 2014

+ + + + +

The National Organic Standards Board convened at 8:30 a.m., at the St. Anthony Hotel, 300 East Travis Street, San Antonio, Texas, Mac Stone, Chairperson, presiding.

MEMBERS PRESENT:

MAC STONE, Chairperson  
JOHN FOSTER, Vice Chairperson  
CALVIN WALKER, NOSB Secretary  
HAROLD AUSTIN  
CARMELA BECK  
COLEHOUR BONDERA  
JOSEPH DICKSON  
TRACY FAVRE  
JAY FELDMAN  
WENDY FULWIDER  
NICHOLAS MARAVELL  
JEAN RICHARDSON  
ZEA SONNABEND  
JENNIFER TAYLOR  
FRANCIS THICKE

STAFF PRESENT:

MILES McEVOY, Deputy Administrator, National  
Organic Program

MICHELLE ARSENAULT, Advisory Board  
Specialist

MELISSA BAILEY, Director, Standards  
Division, National Organic Program

LISA BRINES, Standards Division, National  
Organic Program

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

(8:31 a.m.)

CHAIR STONE: Okay. I've got 8:30  
-- 8:31 actually. We've got a lot of voting  
to do today. We had great discussion on these  
materials the last two or three -- three days  
I guess.

I think everyone in the audience  
heard that several of these are going back to  
committee. And I think actually my sense is  
the Board members appreciate that, they're  
fine with that. They feel like we did good  
work, we listened to comment, we read  
comments, we adjusted our decisionmaking  
because of the good information that we got  
from the broader community.

So we talk about it at the Board  
level, of how do we engage the community  
during our deliberations so that we can get  
closer to the right thing before we get here.  
And so there's several layers of continual  
improvement, and I think information-sharing,

1 but I'm pretty proud of this group of people  
2 that worked hard, listened hard, and going  
3 back to work on these same materials so that  
4 we can get it right in the long run.

5 So, Board members, I know it's  
6 going to be feel sort of not fun to go around  
7 on referrals. But with Robert's Rules, when  
8 you have a two-third majority that's needed,  
9 you have to do a roll call vote. And it goes  
10 into the -- it gets recorded that way. We  
11 can't just everybody raise their hand or nod  
12 or whatever. We have to go around.

13 So I think we'll go through just  
14 in order. Ms. Grateful Dead, Zea, over here,  
15 we'll start with the Crops Committee when Zea  
16 gets settled in.

17 I think it makes most sense -- we  
18 do have a hard stop at 11:15. So I think  
19 that's plenty of time to discuss the ones that  
20 are not being referred back to committee. But  
21 I will be moving it along. If it gets to that  
22 point, we'll have to just stop the

1 deliberations and vote to move on. Because of  
2 the Federal Register Notice, the meeting has  
3 to end on time. And, besides that, several of  
4 us have planes to catch and we planned on  
5 being finished on time, frankly.

6 So is there any other  
7 housekeeping? Miles, anything you've got?

8 MR. McEVOY: No.

9 CHAIR STONE: Okay. Colehour?

10 MEMBER BONDERA: Thank you. Don't  
11 mean to correct you, but you read it quickly,  
12 and I just want to make sure it's clear. It  
13 says 11:15 is when that session starts. It  
14 ends at 11:45. Just so you aren't looking at  
15 your clock this whole time thinking we're  
16 ending at 11:15.

17 CHAIR STONE: Right. No, the  
18 voting ends at 11:15. Right.

19 MEMBER BONDERA: No. Is that --  
20 okay. Okay. Thank you. Thank you. I'm  
21 reading it wrong now. Thank you.

22 CHAIR STONE: Okay. Zea, are you

1 settled in? We'll start with streptomycin.

2 MEMBER SONNABEND: Okay. This is  
3 my birthday celebration, not the Grateful  
4 Dead, because it's the last day, so we might  
5 as well celebrate today. And Michelle gave me  
6 this.

7 Okay. The first thing in the  
8 Crops Committee will be streptomycin. And I  
9 don't know, do you want the point person to  
10 read the motion for each one? Which I think  
11 would be good, since I don't have it in front  
12 of me?

13 CHAIR STONE: Correct. I think  
14 let the point person start the discussion.

15 MEMBER SONNABEND: Okay. So, then  
16 I'll ask Harold to take it away.

17 MEMBER AUSTIN: Okay. For  
18 streptomycin, classification motion, we won't  
19 need as it's already on the national list  
20 classified as a synthetic. The listing  
21 motion, which is before us, is the motion to  
22 remove the existing expiration date of October

1 21, 2014, for streptomycin at 205.601-I-11,  
2 and replace it with an expiration date of  
3 October 21, 2017, so that the listing reads,  
4 "Section 11 streptomycin for fire blight  
5 control in apples and pears only until October  
6 21, 2017."

7 CHAIR STONE: So I'm going to let  
8 that be as a motion. You didn't just read the  
9 motion. That is a motion, correct?

10 MEMBER AUSTIN: I move to accept  
11 this motion as I just read it.

12 CHAIR STONE: Okay. Is there a  
13 second?

14 MEMBER SONNABEND: I'll second it.

15 CHAIR STONE: Seconded by Zea. Is  
16 there further discussion on this motion? Jay?

17 MEMBER FELDMAN: Just to make it  
18 clear, could we just explain that a vote in  
19 favor will extend streptomycin and a vote  
20 against will keep the existing expiration date  
21 of October 2014.

22 CHAIR STONE: Correct. Thank you

1 for clarifying that. Does anyone have further  
2 conversation versus having thought about it  
3 from the other day?

4 (Off-microphone comment.)

5 CHAIR STONE: Thank you. Michelle  
6 reminded us we discussed the other day,  
7 whichever day, conflict of interest. The  
8 process that we have is the Board has emailed  
9 a chart of all of the petitions on the table,  
10 and Board members self-declare whether they  
11 have a conflict of interest under the  
12 definition, the USDA definition that we have  
13 been advised of.

14 No one on the Board, to my  
15 knowledge, had any conflicts on any of the  
16 materials today. But I welcome any Board  
17 member that wishes to declare their interest  
18 or potential perception of interest. If they  
19 would like to, you're certainly welcome to do  
20 so. Zea did the other day, and she said that  
21 lasts for the whole meeting, the way I  
22 remember it. But anyone else is certainly

1 welcome to do so.

2 MR. McEVOY: Yeah, and as the  
3 Designated Federal Officer for the National  
4 Organic Standards Board, the information that  
5 was supplied by the members indicated that no  
6 members have a conflict of interest with any  
7 of the proposals being voted on.

8 CHAIR STONE: Okay. Thanks.  
9 Thanks, Michelle, for keeping us on track.

10 Harold, did you have your hand up?

11 MEMBER AUSTIN: Okay. Before we  
12 start to take our vote, I would just like to  
13 make a few comments in defense of the listing  
14 motion. I think, you know, we've gone through  
15 the written public comment period. We've gone  
16 through the oral testimony. And I think we've  
17 gotten some decent feedbacks from both those  
18 that are in favor of this motion and those  
19 that have some very solid-based grounds of  
20 concerns about not moving this motion forward.

21 I would like to say that, in  
22 Seattle, this Board challenged the organic

1 producer industry to go out and start to begin  
2 to take the task of finding alternatives to  
3 streptomycin and tetracycline, which the  
4 industry did. I think we heard in testimony  
5 yesterday that research testing and  
6 development on replacement products will take  
7 anywhere from five to 10 to as long as 15  
8 years to really go through that cycle of  
9 taking and learning a product, learning  
10 physically how to use it, taking that product,  
11 then, and being able to physically work it  
12 into a day-to-day operation, something that a  
13 grower has a comfortability about using that  
14 product and knowing that it's not going to  
15 damage his crop in a different way than maybe  
16 what fire blight was, if we use products we  
17 can cause russet, whatever.

18 I think the problem for me is that  
19 the Board set the ground rules when they  
20 challenged the industry and they told them in  
21 Seattle to go forward and come back to us and  
22 show us that you're making progress, which is

1 exactly what they did. They haven't completed  
2 the trials. They haven't completed the  
3 testing.

4 We've got one material, and we  
5 continue to hear about, well, we've got this  
6 Blossom Protect. As we heard in oral  
7 testimony, and as we saw in written testimony,  
8 Blossom Protect is not a panacea for a full  
9 replacement of antibiotics. It's not shown to  
10 be completely effective in all geographic  
11 locations of the United States. It's a  
12 material that does not replace the antibiotics  
13 post-bloom. Post-bloom is a serious point of  
14 control when we've got tip blight and we've  
15 got blight that can be caused from hail  
16 damage. We have no material.

17 There is a material, a copper,  
18 that is still tied up. We talked about it  
19 during the tetracycline discussion. It's  
20 still tied up with EPA. It does sound like  
21 it's coming through and will be ready for use  
22 later this season, which of course will be

1 after the fire blight season.

2 The tools aren't yet there for our  
3 stakeholders in the organic sector for the  
4 removal of this material. I don't think  
5 anybody in this room that sits on this Board  
6 wants to see an indefinite period of time for  
7 streptomycin to continue to be used. We know  
8 that's not the right move, and that's not what  
9 sunset is all about, and we appreciate that.

10 To remove this now, before the  
11 rest of the research and development has been  
12 done, will put a hardship on individuals that  
13 we heard yesterday. These crops are not crops  
14 that get replaced each and every year, once or  
15 twice a year. These are crops that are put in  
16 the ground and they are going to have a  
17 lifetime expectancy of 20 to 30 years. That  
18 is a tough loss when you're starting to take  
19 those trees, those plants, that production out  
20 of the equation for your family livelihood.

21 We owe it to our organic  
22 stakeholders, our producers that rely on this

1 material, to give them this extension and set  
2 a hard-fast date of October 21, 2017, for a  
3 firm and definite removal. We are not yet  
4 there. 2011 to 2014 is not adequate time for  
5 the research and development to have been  
6 given proper time to take place and reach full  
7 continuity and have the results back to the  
8 industry and the stakeholders that they need.

9 Thank you.

10 CHAIR STONE: Thank you, Harold.

11 Zea?

12 MEMBER SONNABEND: I just would  
13 like to speak from personal experience and on  
14 behalf of the pear growers in California.  
15 Pears are more susceptible, as we've heard, to  
16 fire blight. California does have a pear  
17 industry. We've been watching this carefully.  
18 We have very different conditions there than  
19 they do in Washington and Oregon. And since  
20 I've been really trying to encourage our  
21 growers to move away from antibiotics, I have  
22 been trying to stay on top of all of the

1 guidance and suggestions and research and like  
2 that to tell our growers.

3           The research and the public  
4 information for the most part is oriented  
5 towards Washington and Oregon. And so, for  
6 instance, we eagerly awaited the publication  
7 by David Granatstein and Harold Ostenson. It  
8 was not released until March of this year,  
9 which is after blooms started for California  
10 pears in the Central Valley and in my area.  
11 And by after bloom it is too late to do an  
12 integrated program for that year. I mean,  
13 it's not too late to do some of it, but it's  
14 too late to do the whole integrated program.  
15 You have to start in the dormant season.

16           So, you know, we being  
17 enterprising, fruit growers on my farm decided  
18 the future is in fire-resistant pears, so  
19 let's plant a block of them. Well, that is  
20 not that easy. There is one variety. It's  
21 not that easy to find. We had to have it  
22 custom-grafted onto rootstock that works in

1 our area, because it is not the same rootstock  
2 as in Washington, and so we have to wait.

3 That's a two-year process for us to arrange  
4 the custom grafting onto the right rootstock.

5 And so even though I started last  
6 year, we won't be able to have those trees to  
7 even plant until next year. And then we have  
8 to wait five to seven years to get pears.

9 And so, you know, people are like,  
10 okay, the consumers don't want antibiotic  
11 pears. Okay. The consumers get a choice  
12 between conventional pears, pears from  
13 Argentina, or no pears at all.

14 So, the organic consumer has  
15 spoken. They don't want pears. I'm sorry,  
16 but that's what it boils down to for the next  
17 several years. And my estimate is,  
18 realistically, 10 to 20 years until a good  
19 supply of organic pears will become available  
20 again. And that's why I'm in support of this  
21 motion.

22 CHAIR STONE: Thank you, Zea.

1 Others? Jay?

2 MEMBER FELDMAN: Thank you. The  
3 discussion we're having is critical to how we  
4 try to balance the need for materials versus  
5 the adverse impacts of materials, and that's  
6 always a challenge, obviously. And I don't  
7 think anybody feels good about taking  
8 materials away, especially when the need is  
9 established.

10 In many ways, I view organic as  
11 having a number of pressure points that are  
12 elevated among the many, this being one of  
13 them, this being one of them for the reason  
14 that most of the people -- and you mentioned  
15 consumers -- most of the people that buy  
16 organic food have believed that antibiotics  
17 are not a part of the inputs, or not among the  
18 inputs.

19 And, you know, that is how the  
20 industry has evolved, for better or worse.  
21 And so we're trying to catch up with that  
22 perception out there. And in the context of

1     how we might do that, this Board, I think, has  
2     been extremely diligent in trying to effect  
3     the transition.

4             It didn't start in Seattle. It  
5     started years before. By the time it got to  
6     Seattle, we were already faced with an  
7     expiration date. The Seattle meeting extended  
8     the expiration date. So, you know, you can go  
9     back to some of the original meetings of the  
10    Board, and this has been on the table.

11            You know, one thing I'm beginning  
12    to realize, until the hammer falls, the  
13    incentive doesn't seem to be there, for some  
14    reason. And I wish it weren't that way. I  
15    wish people would actually read the  
16    transcripts and see how serious the issues are  
17    and try to stay ahead of the curve. But  
18    typically what we've seen, you know, I've  
19    worked the pesticides side of ag production  
20    for many years, and I can tell you, in all the  
21    hot button issues, most of what I've seen  
22    happen in industry is to rally around

1 supporting a material rather than trying to  
2 get ahead of the curve and transition.

3           So to say that the hammer fell in  
4 Seattle on this I don't believe is accurate.  
5 Yes, the Board has picked up a degree of  
6 seriousness that has become more and more  
7 elevated. And I think it has become more  
8 elevated because when you see medical  
9 institutions, like the World Health  
10 Organization, and, you know, doctors that are  
11 concerned about antibiotic resistance in very  
12 serious public health terms, then, you know,  
13 a Board like this is really instructed to  
14 consider that.

15           And so when we make this decision,  
16 unfortunately, it's not just a decision of,  
17 well, what does an individual sector need or  
18 believe it needs for having a successful crop,  
19 because that is changing all the time. We  
20 need to do a better job of conveying the  
21 seriousness of the transition away from  
22 materials that are believed to be out of

1 compliance with the standards of OFPA.

2 Because obviously the message from the Board  
3 didn't get out in 2008, didn't get out years  
4 before that, if you go through the transcript,  
5 which I have, where there is a very serious  
6 discussion.

7 So the discussion doesn't motivate  
8 the change. You know, when I tried to bring  
9 Harold Ostenson to the conversation back in  
10 Seattle, I was told that was inappropriate.  
11 And that his name was just referenced because  
12 he has written a document for the Organic  
13 Center, which is very helpful.

14 But the industry has known about  
15 Dr. Ostenson for a very long time, and that he  
16 has been assisting growers in transitioning  
17 away from these materials. So we're at this  
18 juncture where we shouldn't really be, and it  
19 shouldn't have had to come down to this. We  
20 should have been able to get to this point  
21 through a more collaborative spirit, and it  
22 shouldn't be viewed as environmentalists or

1 consumers against growers.

2 The whole purpose of this Board is  
3 to bring all of us together to put the message  
4 out there to effect the transition, and we  
5 just haven't gotten to that yet.

6 So we're dealing with human  
7 pathogens and fire blight bacteria that share  
8 the same exact gene pool of genes resistant to  
9 streptomycin. You can't deny that. There is  
10 a direct connection there. We are dealing  
11 with streptomycin residues that are sometimes  
12 present in treated fruit. We can't deny that.  
13 And at the same time, we are dealing with the  
14 fact that streptomycin is still an important  
15 antimicrobial that is used to fight human  
16 pathogens.

17 I'm not going to go into all of  
18 the details about how, you know, horizontal  
19 gene transfer works. You've got the  
20 testimony. You've got Dr. Morris' statements  
21 that he delivered to the Board in Portland and  
22 reiterated in public comment. You've got the

1 Infectious Disease Society of America, which  
2 has raised a very serious, you can call it  
3 precautionary appeal or precautionary  
4 standard, but that is what medicine is about,  
5 connecting the dots and saying to the public  
6 we have sufficient evidence to urge you to  
7 take another course, even though all of the  
8 science isn't on the table at this point.

9           There is enough science that they  
10 could reach the conclusion that this  
11 connection that I just read you is evident,  
12 this horizontal gene transfer and this  
13 connection to human pathogens and the  
14 resistance associated with them.

15           So, when we have the discussion,  
16 yes, we need to hear what Harold is saying.  
17 This is very painful that, you know, we've  
18 gotten to a point where the clock somehow only  
19 started ticking in Seattle, when this Board  
20 has been on record for about a decade at  
21 least, if not more, that this was a problem.

22           Medical communities weighing in,

1 consumers, at the end of the day, we have to  
2 protect the label and the integrity of the  
3 label and ensure consumer trust. So, you  
4 know, as Zea said yesterday, you sit and watch  
5 these issues from the audience and you say,  
6 "Boy, I hope I don't have to vote," or "I'm  
7 glad I don't have to vote on that." And we're  
8 at one of those junctures where we shouldn't  
9 have to be voting on this. This should have  
10 transitioned on its own through the great work  
11 of this Board historically, but it didn't. So  
12 we're forced to push it along again in the  
13 interest of protecting consumer trust in the  
14 label. So, you've heard me say all of this  
15 before, but there you have it.

16 CHAIR STONE: Wendy?

17 MEMBER FULWIDER: I find that when  
18 consumers come directly to the farm and they  
19 have questions about organic and conventional  
20 and transitioning and all of those things, if  
21 you take the time to explain it to them, they  
22 understand it. And I think the bulk of

1 consumers would support having organic fruit  
2 in the United States, even if we need to give  
3 them time and give them a few tools, because  
4 it's going to be cleaner, it's going to be  
5 more sustainable, and it's going to be better.

6 And we really need to move forward  
7 and support one another rather than push  
8 producers out of the industry.

9 CHAIR STONE: Thank you, Wendy.

10 Harold?

11 MEMBER AUSTIN: I'd just like to  
12 say that, Jay, the decision in Seattle 2011  
13 didn't start the hammer drop-down and the  
14 industry working for a solution to the  
15 antibiotic use. I have been raised my whole  
16 life in tree fruit production in the  
17 Northwest. I've been a licensed crop  
18 consultant for over 35 years. I have been  
19 involved in the organic industry for over 20.  
20 I've been in IPM since its inception in the  
21 Northwest.

22 We've been looking for a solution

1 for antibiotics for as long as I can remember.  
2 For the organic sector, with the transitioning  
3 of the acreages starting in 2008, we started  
4 to see enough volume where people outside the  
5 scope of the norm started to look at the  
6 organic sector as a viable, plausible,  
7 supporting sector of the agriculture industry,  
8 to where the research and development started  
9 to take place.

10 We started to see some grants come  
11 through. We started to see some research  
12 projects starting to be initiated. So it  
13 wasn't 2011, this hammer dropping, as you  
14 said. 2011 was the arbitrary date of 2014 for  
15 this to expire from use for our industry.

16 The research and development from  
17 the growers has been going on for as long as  
18 I've been a part of tree fruit farming. It's  
19 a continual phase, it's a continual process,  
20 and that's why I'm saying it's not like all of  
21 a sudden the light bulb clicked on and these  
22 growers said, "Hey, wow, look, we've got to

1 start doing something because the National  
2 Organic Standards Board in Seattle in 2011  
3 said, 'You've got to get your act together.'"

4 Their act has been together. It  
5 has been together for a very long time. They  
6 just haven't had the resources or the ability  
7 or the financial backing from the universities  
8 and the grants and those entities that provide  
9 that ability for them to be able to be  
10 successful. They are making huge progress.  
11 I feel that we need to afford them the  
12 opportunity, the time, and our support to make  
13 that happen.

14 I know there's a concern from a  
15 lot of other stakeholders. We're not denying  
16 that, and we're not turning our backs on that.  
17 It's not like these guys are asking for an  
18 expiration date of 2020, 2030. They're  
19 looking for a couple more years to get a  
20 couple more products and some research  
21 material out in the field where they can  
22 physically get their hands on it, take a look

1 at it, integrate it into their organic systems  
2 plants in a functional, viable way. That's  
3 all they're looking for, and that's all I've  
4 got to say.

5 But the research and the industry  
6 movement from those stakeholders, those  
7 producers, didn't start in 2011. It started  
8 a heck of a long time before that.

9 CHAIR STONE: Thank you. Others?

10 (No response.)

11 Okay. I think it's framed pretty  
12 well, and we're ready for a vote. Okay.  
13 Starts with Harold.

14 MEMBER AUSTIN: Hm, let me think  
15 about that.

16 (Laughter.)

17 Yes.

18 VICE CHAIR FOSTER: Yes.

19 SECRETARY WALKER: No.

20 MEMBER RICHARDSON: No.

21 MEMBER DICKSON: Yes.

22 MEMBER BECK: Yes.

1 MEMBER FAVRE: No.

2 MEMBER MARAVELL: Yes.

3 MEMBER FULWIDER: Yes.

4 MEMBER THICKE: No.

5 MEMBER BONDERA: No.

6 MEMBER TAYLOR: No.

7 MEMBER FELDMAN: No.

8 MEMBER SONNABEND: Yes.

9 CHAIR STONE: Yes.

10 The vote was seven nos, eight yes,  
11 motion fails. Thank you. It's not easy.

12 MEMBER AUSTIN: Mac, we would like  
13 to go ahead and bring forth the additional  
14 resolution motion at this time as well.

15 CHAIR STONE: Proceed.

16 MEMBER AUSTIN: Okay. We also  
17 have an attached resolution motion with the  
18 streptomycin motion we'd like to take and put  
19 before the Board. And it reads, "The National  
20 Organic Standards Board is committed to the  
21 phase-out of this material. Between now and  
22 the expiration date, the Board urges growers

1 and certifiers to include an organic systems  
2 plan, an annual increase in the extent and/or  
3 number of alternative practices and materials  
4 that are trialed for controlling fire blight.  
5 In addition, the Board strongly advocates to  
6 the USDA a high priority for increased support  
7 for research into these alternative practices  
8 and materials."

9 I make this motion.

10 CHAIR STONE: Thank you, Harold.

11 Is there a second?

12 MEMBER BONDERA: I'll second that  
13 motion.

14 CHAIR STONE: Second, Colehour  
15 Bondera. Any further conversation?

16 (No response.)

17 Voting begins with John.

18 VICE CHAIR FOSTER: Yes.

19 SECRETARY WALKER: Could you  
20 repeat what has been said, what we're voting  
21 on?

22 CHAIR STONE: The resolution, the

1 commitment resolution that is --

2 MEMBER AUSTIN: A yes vote would  
3 accept this resolution from the Board; a no  
4 vote would not.

5 SECRETARY WALKER: Yes.

6 MEMBER RICHARDSON: Yes.

7 MEMBER DICKSON: Yes.

8 MEMBER BECK: Yes.

9 MEMBER FAVRE: Yes.

10 MEMBER MARAVELL: Yes.

11 MEMBER FULWIDER: Yes.

12 MEMBER THICKE: Yes.

13 MEMBER BONDERA: Yes.

14 MEMBER TAYLOR: Yes.

15 MEMBER FELDMAN: Yes.

16 MEMBER SONNABEND: Yes.

17 CHAIR STONE: Yes.

18 MEMBER AUSTIN: Yes.

19 Fifteen-zero.

20 CHAIR STONE: Fifteen-zero.

21 Motion passes. Thank you, Harold.

22 Magnesium oxide. Zea?

1                   MEMBER SONNABEND: Okay. That  
2 would be -- Francis will read the motion.

3                   MEMBER THICKE: So, first, we need  
4 a classification motion, and so I make a  
5 motion to classify magnesium oxide as a  
6 synthetic.

7                   MEMBER AUSTIN: Second that.

8                   CHAIR STONE: Motion by Francis.  
9 Second by Harold. Any conversation?  
10 Deliberations?

11                   (No response.)

12                   Voting begins with Calvin. Oh,  
13 I'm sorry. Jay?

14                   MEMBER FELDMAN: Sorry about that.  
15 Okay. So this is the synthetic motion we're  
16 voting on right now?

17                   CHAIR STONE: Correct.

18                   MEMBER FELDMAN: Okay. Sorry.

19                   CHAIR STONE: Voting begins with  
20 Calvin.

21                   SECRETARY WALKER: Yes.

22                   MEMBER RICHARDSON: Yes.

1 MEMBER DICKSON: Yes.  
2 MEMBER BECK: Yes.  
3 MEMBER FAVRE: Yes.  
4 MEMBER MARAVELL: Yes.  
5 MEMBER FULWIDER: Yes.  
6 MEMBER THICKE: Yes.  
7 MEMBER BONDERA: Yes.  
8 MEMBER TAYLOR: Yes.  
9 MEMBER FELDMAN: Yes.  
10 MEMBER SONNABEND: Yes.  
11 MEMBER AUSTIN: Yes.  
12 VICE CHAIR FOSTER: Yes.  
13 CHAIR STONE: Yes.  
14 SECRETARY WALKER: Fifteen-zero.  
15 CHAIR STONE: Fifteen-zero.  
16 Motion passes.  
17 Francis?  
18 MEMBER THICKE: So I make a motion  
19 to list magnesium oxide at 205.601 with the  
20 following annotation, "For use only to control  
21 the viscosity of a clay suspension agent for  
22 humates."

1 CHAIR STONE: Motion by Francis.

2 Is there a second?

3 MEMBER RICHARDSON: Second.

4 CHAIR STONE: Who said that?

5 Jean? Motion second by Jean. Any

6 deliberations?

7 MEMBER FELDMAN: Okay. Thank you.

8 Okay. I originally supported this motion, as  
9 you know, in subcommittee because I believed  
10 that this, based on the data received, would  
11 provide -- serve a useful function. As with  
12 many of the petitions that we get, there are  
13 issues of a variety of manufacturing  
14 processes. Some are better than others, you  
15 know, when it comes to extraction or source  
16 material or release of effluent or some sort  
17 of contaminant associated with the  
18 manufacturing process.

19 In this case, as we talked about  
20 yesterday -- I'm not going to repeat all of  
21 this again, but there are contaminants  
22 associated with that process or source

1 material. I always felt comfortable with  
2 these deficiencies or limitations or  
3 imperfections in -- you know, in the petitions  
4 insofar as them being perfectly "safe,"  
5 quote/unquote, and took some console in the  
6 fact that -- or consolation in the fact that  
7 we would, as a Board, revisit these materials  
8 under the same rigorous process that we  
9 applied to their initial listing on the  
10 national list.

11           So, in other words, we are now  
12 going to vote on this. It will require a  
13 two-thirds vote. And in five years we would  
14 have voted on this again; it would have  
15 required a two-thirds vote. And that provided  
16 the kind of incentive, both in research and in  
17 the -- in the industry to push toward the  
18 safer manufacturing processes.

19           We are taking that incentive away,  
20 and we are -- as we have seen with other  
21 materials, as soon as you introduce a  
22 material, you create a dependency on that

1 material. This certainly will make things  
2 easier to build organic matter in the soil, to  
3 create a more healthy humus in the soil.  
4 These are all good things. This is part of  
5 what we want to do in organic production. But  
6 we don't have access to it now, and we are  
7 doing those things.

8 We could do it better and more  
9 easily, but we need to maintain the rigor with  
10 which we evaluate whether this material is  
11 acceptable, and, more importantly whether we  
12 can do it better, whether we can make this  
13 material better.

14 There is no incentive for someone  
15 to go out there and invest in R&D if they  
16 don't think they could get the votes when  
17 you've got a whole bunch of folks showing up  
18 at a meeting or commenting that they need this  
19 material in this form because of its unique  
20 characteristics, et cetera.

21 It's very hard once you let  
22 something on the Board -- on the list, you put

1 something on the list, to have the kind of  
2 conversation we are supposed to have when we  
3 initially put it on the list. If we don't  
4 have that conversation, things get skewed  
5 toward one side, and that's -- that's exactly  
6 what the drafters of the law, of the Organic  
7 Foods Production Act, were trying to avoid.

8           So I -- I believe it's appropriate  
9 to establish an expiration date when we adopt  
10 petitions. Petitions are within the realm of  
11 the Board. None of the new policies that have  
12 been put in place as far as I understand it --  
13 and I have been back through all of the  
14 training materials and the different memos --  
15 none of the materials that we have received  
16 have been specific to the petition process.  
17 They have been specific to the sunset process.

18           So here we are as a Board asking  
19 ourselves, are there enough questions about  
20 the production processes associated with  
21 magnesium oxide that warrant us going through  
22 this same deliberative process five years from

1 now to make a determination that this material  
2 meets the standards and there hasn't been  
3 something else that has come along that has --  
4 that would make this a safer material or  
5 change the manufacturing process in some way.

6 So I would like to introduce a  
7 motion at some point when it's appropriate,  
8 Mr. Chair, to amend this motion to add a  
9 five-year expiration date after the  
10 publication of the rule listing this material  
11 on the national list. And I would ask for,  
12 when appropriate, a second to that motion.

13 CHAIR STONE: Would you restate  
14 the motion, the amendment to the motion?

15 MEMBER FELDMAN: Yes. The  
16 amendment would be -- I don't have it in front  
17 of me. It's in the minority position.

18 MEMBER SONNABEND: Doesn't the  
19 maker of the motion have to accept the  
20 amendment?

21 MEMBER FELDMAN: No.

22 MEMBER SONNABEND: And the second?

1                   MEMBER FELDMAN: No. Not if I get  
2 a second. I wasn't introducing it. I was  
3 waiting for the Chair to tell me the  
4 appropriate time. But, no, the maker of the  
5 motion has to get a second, and then we  
6 discuss the second motion. And after that  
7 vote, then we go on to discuss the primary  
8 motion. And it would require a majority vote,  
9 but I guess under our rules a two-thirds vote  
10 to amend the motion.

11                   So there you have it. To list  
12 magnesium oxide at 205.601 with the following  
13 annotation, "Until May 1, 2019, five years  
14 after, or" -- it should say "or five years  
15 after the date it is first allowed" -- sorry?  
16 That's it.

17                   CHAIR STONE: It does say that.

18                   MEMBER FELDMAN: Sorry. Thank  
19 you.

20                   MEMBER THICKE: I'll second that  
21 motion.

22                   CHAIR STONE: I have a motion and

1 a second by Francis for an amendment to set a  
2 hard date for this material to come off the  
3 list. Is that characterized right?

4 Discussion? Nick?

5 MEMBER MARAVELL: Just sort of a  
6 technical question here. We've got two  
7 potentially conflicting dates here. Do you  
8 mean for five years after the date is first  
9 allowed, whichever is later? Because we have  
10 two dates now, May 1 --

11 MEMBER FELDMAN: Yes.

12 MEMBER MARAVELL: -- and for five  
13 years. So whichever is later?

14 MEMBER FELDMAN: Yes. Thank you.

15 MEMBER MARAVELL: So would you  
16 accept that as a friendly amendment?

17 MEMBER FELDMAN: Yes. Thank you.

18 CHAIR STONE: Everybody is clear  
19 with that clarification? Harold?

20 MEMBER AUSTIN: Will this  
21 constitute a significant change from what has  
22 been posted for public commentary?

1 CHAIR STONE: I yield to the  
2 program.

3 MR. McEVOY: No. That would not.  
4 That's just a clarification of something that  
5 is already on the table, or as part of this  
6 minority opinion. So it's not -- I think  
7 maybe Lisa needs to clarify this, but my  
8 understanding is that the minority position  
9 would have to -- in order to be voted on would  
10 need a majority of the members to vote to then  
11 be able to vote on it to substitute for the  
12 majority proposal coming out of the  
13 subcommittee.

14 DR. BRINES: Yes, that's correct.  
15 So just as a clarification for everyone, at  
16 this point the motion is to amend the listing  
17 motion. So the focus of the debate should be  
18 focused on whether to accept that amendment.  
19 If that amendment does not pass, then you  
20 would revert back to the original motion.

21 Thanks.

22 CHAIR STONE: Zea?

1                   MEMBER SONNABEND: Thank you, Mac.

2                   This is the point where I'm going to invoke  
3                   the lyrics to the song that I feel is most  
4                   appropriate for this event, which is -- I  
5                   can't sing like Peter Rowan, and so I'm just  
6                   going to read you a couple of lines. Peter  
7                   Rowan is a very good singer.

8                   "If you ever feel sorrow for the  
9                   deeds you have done, with no hope for tomorrow  
10                  in the setting of the sun, I will meet you at  
11                  Alamo Mission and we can say our prayers."

12                  Since we're in San Antonio, I just have to say  
13                  that I resent the position that the Board will  
14                  not do a rigorous review every five years in  
15                  sunset, and I don't believe that every  
16                  material should be held hostage to people who  
17                  are unhappy with the sunset process.

18                  Therefore, I completely reject  
19                  this idea of putting an expiration date on  
20                  this or any other material.

21                  Thank you.

22                  CHAIR STONE: Colehour?

1                   MEMBER BONDERA: Thank you. And  
2                   thank you, Zea. I think at some level we  
3                   completely agree, except for the last part of  
4                   what you said, which is an ultimatum of "it  
5                   can't happen with any," because your  
6                   suggestion was, you know, it may or may not be  
7                   appropriate, and then you're like, but this  
8                   can't -- this doesn't need to be applied at  
9                   all. And I think in some cases it does, in my  
10                  opinion, and in this particular case I think  
11                  that a reevaluation will be appropriate on  
12                  considering what has been put forth and  
13                  discussed already, even up to this point.

14                         So I do not disagree that, you  
15                         know, maybe it does not need to be applied  
16                         across the board. Maybe, maybe not. But I  
17                         think that, you know, the opposite doesn't  
18                         make sense either, in my opinion.

19                         CHAIR STONE: Jay? And we do need  
20                         to move on here.

21                         MEMBER FELDMAN: You know, I  
22                         believe the maker of the motion and the

1     seconded is -- wants to make the process work  
2     and wants to facilitate access to materials  
3     that can assist organic growers.  If anyone  
4     could show me where, over the history of this  
5     Board, the application of the sunset process,  
6     as envisioned by the drafters of the statute  
7     and carried out over the last 15-plus years,  
8     has been harmful to organic growers and the  
9     growth of a 35 or more billion dollar  
10    industry, I would like to see that  
11    information.

12                   This has been a healthy, rigorous  
13    debate as part of petitioning and sunset, the  
14    exact debate that the drafters envisioned.  So  
15    that at the end of the day the consumers  
16    trusting in the label understood that these  
17    issues had been hashed out in the most  
18    thorough and honest, scientific way, with  
19    growers sitting around the table, consumers  
20    bringing their views together.  This is  
21    healthy.  This isn't antagonistic, because we  
22    all want the same thing.

1                   I think -- I hope, I truly hope  
2                   that people believe that. So we're talking  
3                   about fixing a problem. In fact, what we're  
4                   doing is undermining the integrity of the  
5                   label. You may not see it that way, but I  
6                   hope -- I don't want to be -- I hope I'm wrong  
7                   about this. I hope consumers will -- this is  
8                   just a blip in the history and consumers will  
9                   say, "Oh, what the heck. It doesn't matter."  
10                  But I don't see it panning out that way.

11                  I have never wanted to bring these  
12                  issues to a forum outside this room. I have  
13                  always protected the sanctity of this room and  
14                  this Board to have an honest and open  
15                  discussion with the most informed audience I  
16                  know of at any public hearing that I have ever  
17                  been at over the years, to engage that  
18                  informed community and do it in a way that  
19                  ensures that at the end of the day, even  
20                  though we emerge from this room with  
21                  disagreements, the consumers that emerge, the  
22                  environmentalists that emerge, the farmers

1 that emerge said, "Well, we at least had a  
2 real honest and open debate, and everyone had  
3 a chance to vote." And at the end of the day,  
4 we drove this discussion to consensus, and we  
5 did it. And we left it on the list or we took  
6 it off the list.

7 MEMBER RICHARDSON: Call the  
8 question.

9 MEMBER FELDMAN: That's all we're  
10 doing.

11 MEMBER RICHARDSON: Call the  
12 question.

13 CHAIR STONE: The question has  
14 been called, and the voting starts with Jean.

15 MEMBER RICHARDSON: No.

16 MEMBER DICKSON: No.

17 MEMBER BECK: No.

18 MEMBER FAVRE: No.

19 MEMBER MARAVELL: Yes.

20 MEMBER FULWIDER: No.

21 MEMBER THICKE: Yes.

22 MEMBER BONDERA: Yes.

1 MEMBER TAYLOR: Yes.

2 MEMBER FELDMAN: Yes.

3 MEMBER SONNABEND: No.

4 MEMBER AUSTIN: No.

5 VICE CHAIR FOSTER: No.

6 SECRETARY WALKER: No.

7 CHAIR STONE: The Chair votes no.

8 (Pause.)

9 VICE CHAIR FOSTER: I'm going to  
10 have to -- I'm going to have to doublecheck  
11 this here. We got 11 no's and four yeses.  
12 Does that sound -- I don't --

13 MEMBER SONNABEND: I've got five  
14 yeses.

15 VICE CHAIR FOSTER: Okay. Five  
16 yeses. Okay.

17 CHAIR STONE: So 10 no, five yes.  
18 Motion fails. And so we're back to the  
19 original motion to list this as annotated.  
20 Further discussion about the material itself?

21 (No response.)

22 Seeing none, the vote starts with

1 Joe. And take your time going around the  
2 table, please.

3 MEMBER DICKSON: Yes.

4 MEMBER BECK: Yes.

5 MEMBER FAVRE: Yes.

6 MEMBER MARAVELL: Yes.

7 MEMBER FULWIDER: Yes.

8 MEMBER THICKE: Yes.

9 MEMBER BONDERA: Yes.

10 MEMBER TAYLOR: No.

11 MEMBER FELDMAN: No.

12 MEMBER SONNABEND: Yes.

13 MEMBER AUSTIN: Yes.

14 VICE CHAIR FOSTER: Yes.

15 SECRETARY WALKER: Yes.

16 MEMBER RICHARDSON: Yes.

17 CHAIR STONE: Yes.

18 SECRETARY WALKER: Thirteen-two.

19 CHAIR STONE: The vote was 13 yes,  
20 two no's.

21 SECRETARY WALKER: Yes.

22 CHAIR STONE: The motion passes.

1 Thank you.

2 Zea, next up is vinasse.

3 MEMBER SONNABEND: Thank you.

4 Okay. We presented a change to the current --  
5 to the wording for the vinasse motion, which  
6 is on the slide, Michelle. Remember? Yes,  
7 not in the proposal.

8 I will read it while you are  
9 pulling it up. This is for the classification  
10 motion for vinasse, and there is a second  
11 motion also. The classification motion is to  
12 classify vinasse that does not contain  
13 prohibited additives, such as pH adjusters,  
14 sanitizers, ammonium compounds, antibiotics,  
15 or chlorine materials, and is not fortified  
16 with nitrogen as non-synthetic. And I will  
17 make that motion.

18 MEMBER AUSTIN: I'll second it.

19 CHAIR STONE: Motion by Zea.

20 Second by Harold.

21 MEMBER SONNABEND: And could I

22 start --

1 CHAIR STONE: Yes.

2 MEMBER SONNABEND: -- out with a  
3 clarification on this.

4 CHAIR STONE: Yes, ma'am.

5 MEMBER SONNABEND: I do want to  
6 remind the Board what I said yesterday, that  
7 if this fails, then vinasse is a -- no longer  
8 a subject before this Board. There is nothing  
9 else we could do unless someone wanted to come  
10 back at the next meeting with a proposal about  
11 it being synthetic, and that would -- so since  
12 that's relatively unlikely to happen, it will  
13 mean that vinasse will be essentially  
14 unregulated in the organic community as it is  
15 now.

16 Thank you.

17 CHAIR STONE: Any other  
18 discussion? Going once, going twice.

19 (No response.)

20 Okay. Voting starts with Carmela.

21 MEMBER BECK: Yes.

22 MEMBER FAVRE: Yes.

1 MEMBER MARAVELL: Yes.

2 MEMBER FULWIDER: Yes.

3 MEMBER THICKE: Yes.

4 MEMBER BONDERA: Yes.

5 MEMBER TAYLOR: No.

6 MEMBER FELDMAN: Yes.

7 MEMBER SONNABEND: Yes.

8 MEMBER AUSTIN: Yes.

9 VICE CHAIR FOSTER: Yes.

10 SECRETARY WALKER: Yes.

11 MEMBER RICHARDSON: Yes.

12 MEMBER DICKSON: Yes.

13 CHAIR STONE: Yes. Fourteen yes,  
14 one no. Motion passes.

15 Zea?

16 MEMBER SONNABEND: Thank you. The  
17 second motion is to add specific language in  
18 the listing for vinasse in the guidance on  
19 materials for organic product production and  
20 OP 5034-1. Vinasse may not contain  
21 prohibitive additives, such as, but not  
22 limited to, pH adjusters, sanitizers, ammonium

1 compounds, antibiotics, or chlorine materials  
2 that are not provided for at 205.601.  
3 Nitrogen levels may not be fortified.

4 CHAIR STONE: Is there a second?

5 MEMBER AUSTIN: I'll second that.

6 CHAIR STONE: Second, Harold.

7 Further discussion? Nick?

8 MEMBER MARAVELL: Yes. I'd just  
9 like to say I have no objection to the motion,  
10 but I think it isn't absolutely necessary. I  
11 feel the program would do that anyway. And I  
12 -- just in the interest of relieving a little  
13 bit of, you know, paperwork and burden on all  
14 concerned, I would hate to see this become a  
15 routinized thing that every time we pass a  
16 motion we also pass a motion with regard to  
17 something that the program is probably going  
18 to do anyway. That's all. But I support the  
19 motion.

20 CHAIR STONE: Zea?

21 MEMBER SONNABEND: Yes. Nick, I  
22 understand that concern. I am -- we are only

1 doing it -- and, yes, it is redundant, but  
2 we're doing it because the guidance is only in  
3 draft form. And I'm imagining that by the  
4 time it comes out in final form there will be  
5 some clarification on how someone would  
6 request a change to that guidance, so that the  
7 Board would not have to do this once it's a  
8 final guidance and we know that things will be  
9 in it.

10 CHAIR STONE: Anything else,  
11 Board?

12 (No response.)

13 Very good. Voting starts with  
14 Tracy.

15 MEMBER FAVRE: Yes.

16 MEMBER MARAVELL: Yes.

17 MEMBER FULWIDER: Yes.

18 MEMBER THICKE: Yes.

19 MEMBER BONDERA: Yes.

20 MEMBER TAYLOR: Yes.

21 MEMBER FELDMAN: Yes.

22 MEMBER SONNABEND: Yes.

1 MEMBER AUSTIN: Yes.

2 VICE CHAIR FOSTER: Yes.

3 SECRETARY WALKER: Yes.

4 MEMBER RICHARDSON: Yes.

5 MEMBER DICKSON: Yes.

6 MEMBER BECK: Yes.

7 CHAIR STONE: Yes.

8 SECRETARY WALKER: Fifteen-zero.

9 CHAIR STONE: Fifteen-aught.

10 Fifteen-love, as they say in tennis. Motion  
11 carries.

12 Okay. Zea, laminarin.

13 MEMBER SONNABEND: Okay.

14 Laminarin, the motion coming out of the  
15 subcommittee is to classify laminarin as  
16 non-synthetic. I will put forward that  
17 motion.

18 CHAIR STONE: Motion by Zea.

19 Second? Is there a second?

20 MEMBER BONDERA: I'll second.

21 CHAIR STONE: Colehour second.

22 Any further discussion?

1                   MEMBER FELDMAN: Yes. Since this  
2 is the only motion on the table on laminarin  
3 I just want to remind folks that a vote in  
4 favor of the motion will mean that the Board  
5 will not review laminarin. There are two  
6 points to be made here. Any further -- in  
7 other words, it would be deemed non-synthetic,  
8 and then any form of it will be allowed to be  
9 used in organic production.

10                   Two points here. One, as we  
11 discussed yesterday, just to remind you, there  
12 is a chemical residue, sodium sulfate, in this  
13 material. It is considered either of  
14 technical or functional effect or significant,  
15 any way you want to look at it. Choose your  
16 category, but it's there.

17                   It is there at considerably  
18 elevated levels. I mean, significant enough  
19 to be -- fall into one of those categories of  
20 technical functional effect or significant,  
21 which are the terms that are used in the --  
22 all of the kinds of draft classification of

1 materials documents that are floating around.

2 We should not be allowing this as  
3 an inert. The inert issue is central to our  
4 decisionmaking process in the present. We  
5 can't be allowing materials onto the market  
6 without evaluating them. I'm not saying we  
7 wouldn't allow this, but without evaluating  
8 the material as a component of the -- making  
9 a component of the material laminarin, and,  
10 thus, making the material a synthetic  
11 material.

12 Secondly, if this doesn't go -- so  
13 I think it's legitimately a synthetic  
14 material, whether you describe that as a  
15 synthetic that has an inert or a synthetic  
16 that has an impurity or a synthetic that is  
17 part of the production or a result of the  
18 production process by virtue of adding an  
19 extractant.

20 But in addition to that, if we  
21 don't put it on the list, then we're not going  
22 to get to any of the manufacturing practices.

1 Are there ecological impacts? Are there  
2 environmental impacts associated with the  
3 laminarin at harvesting, et cetera, et cetera?

4 So that's the reason I will be  
5 voting against this motion. But I would like  
6 to suggest to the Chair that if this motion  
7 were to fail, we should be on record as  
8 defining it as synthetic. So we would need a  
9 motion, is that right, to define it as  
10 synthetic?

11 CHAIR STONE: Zea?

12 MEMBER SONNABEND: Well, if this  
13 motion fails, it goes back to the subcommittee  
14 for potentially a TR to determine whether it's  
15 synthetic or not, and comes back to this Board  
16 at the next meeting for another classification  
17 motion as synthetic or not. We are not  
18 prepared to say that it's synthetic just  
19 because we vote that it's -- if we don't vote  
20 that it's non-synthetic.

21 MEMBER FELDMAN: Okay. That  
22 sounds perfect to me. I would -- I have

1 actually advocated that process, so that would  
2 be the process I would hope we could get  
3 behind. So a no vote would ensure that that  
4 process would take place.

5 Thank you.

6 CHAIR STONE: Zea, would you  
7 clarify that for me, and maybe others?

8 MEMBER SONNABEND: Okay.  
9 Essentially, if you vote no on the motion  
10 today, it's not because you think it's  
11 synthetic; it's because you think there's not  
12 enough information to make it clear to you  
13 that it is non-synthetic. Okay? So you don't  
14 -- you don't have enough information.

15 Therefore, it goes back to the  
16 subcommittee. The subcommittee, in all  
17 likelihood, will request at least a limited  
18 TR, maybe a full TR, on this question. The TR  
19 will illuminate for us the issues around the  
20 impurities, the residues, the ecological  
21 impacts, whatever, we ask it for. And then  
22 you may come back -- and a proposal will come

1 to the next meeting.

2 The proposal will still have a  
3 listing motion, because that's the first -- I  
4 mean, a classification motion, because that's  
5 the first step. Maybe you'll read the TR and  
6 you go, "Okay. It really is non-synthetic."  
7 Maybe you read the TR and go, "Okay. It's  
8 synthetic." But we'll vote again on that.  
9 We're not making that decision today.

10 CHAIR STONE: Thank you for that.  
11 Miles?

12 MR. McEVOY: Yes. A point of  
13 clarification. There are hundreds of  
14 materials that are used by organic farmers  
15 that are never reviewed by this Board. The  
16 majority of the materials used in organic  
17 production are natural substances that never  
18 come in front of this Board for review or  
19 determination.

20 And the NOSB recommendation on  
21 classification of materials is used by  
22 certification agencies and material review

1 organizations each and every day to make  
2 determinations about whether something is  
3 allowed or not, and also the draft guidance  
4 that we published that will eventually become  
5 final guidance on classification materials.

6 So it seems like there is a  
7 distinction between the policy determination  
8 versus this substance itself. And I think  
9 those two things are getting mixed up here,  
10 because by the NOSB's recommendation on  
11 classification materials, my understanding is  
12 that this substance would be classified as a  
13 non-synthetic.

14 So, but just -- the real point is  
15 is that there are hundreds of materials -- and  
16 this is the job that certifiers and material  
17 review organizations are doing each and every  
18 day. Those materials never come before this  
19 Board for consideration, because this Board's  
20 consideration is the purview of the potential  
21 for having synthetics on the national list of  
22 allowed and prohibited substances.

1 CHAIR STONE: Thank you, Miles.

2 Any further discussion?

3 Questions? Zea?

4 MEMBER SONNABEND: Jay wanted me  
5 to clarify why this is a petition before this  
6 Board in light of what Miles just said. And  
7 it is pretty clear to me -- and maybe Lisa  
8 will concur with this -- that this was  
9 petitioned because it is an aquatic plant  
10 extract that is used as a registered  
11 pesticide. Aquatic plant extracts are already  
12 on 205.601 but as a fertilizing material.

13 And so if it were to be declared a  
14 synthetic, it would need to be added for that  
15 use. And if it were declared non-synthetic,  
16 it has to be a non-synthetic extract, because  
17 the aquatic plant extracts that are on the  
18 list are considered synthetic extracts because  
19 of the alkali without the acid. This has both  
20 an alkali and an acid added. Therefore, we  
21 think it's neutralized. But the fertilizer  
22 ones only have alkali, no acid.

1                   It was petitioned. I mean, the  
2 fact that it was petitioned for a review,  
3 unlike all the other natural things which  
4 aren't petitioned. So we're taking it up.

5                   CHAIR STONE: I actually got it,  
6 but I didn't think I was going to. It's  
7 getting --

8                   (Laughter.)

9                   Okay. If people are comfortable,  
10 which I believe we are, voting starts with  
11 Nick.

12                   MEMBER MARAVELL: Oh, great. You  
13 give me an easy one here, Mac.

14                   CHAIR STONE: Okay.

15                   MEMBER MARAVELL: No.

16                   MEMBER FULWIDER: Yes.

17                   MEMBER THICKE: No.

18                   MEMBER BONDERA: No.

19                   MEMBER TAYLOR: No.

20                   MEMBER FELDMAN: No.

21                   MEMBER SONNABEND: Yes.

22                   VICE CHAIR FOSTER: Yes.

1 MEMBER AUSTIN: Yes.

2 SECRETARY WALKER: No.

3 MEMBER RICHARDSON: No.

4 MEMBER DICKSON: Yes.

5 MEMBER BECK: Yes.

6 MEMBER FAVRE: Yes.

7 CHAIR STONE: Yes. Eight yes,  
8 seven no. Motion fails. So it goes back to  
9 committee.

10 Thank you.

11 Okay. While Michelle is getting  
12 up methionine -- I believe that's it, right?  
13 Zea, you're -- we're good on crops?

14 MEMBER SONNABEND: Yes.

15 CHAIR STONE: Thank you.

16 Time check, one hour. Okay. So  
17 methionine. Is the lead on that -- Tracy, do  
18 you want to make any opening statements for  
19 the Livestock Committee?

20 MEMBER FAVRE: No. I think we had  
21 plenty from me yesterday.

22 CHAIR STONE: So as the lead on

1 methionine, I will read into the record the  
2 motion to accept the following amendment at  
3 205.603-D, DL methionine, DL methionine  
4 hydroxyanalog, and DL methionine hydroxyanalog  
5 calcium, CAS Numbers 59518, 583915, 4857447,  
6 and 922509, for use only in organic poultry  
7 production at the following maximum average  
8 pounds per ton of 100 percent synthetic  
9 methionine in the diet over the life of the  
10 flock -- laying and broiler chickens, two  
11 pounds; turkeys and all other poultry, three  
12 pounds.

13 I'll make that motion.

14 MEMBER FAVRE: Second.

15 CHAIR STONE: Second, Tracy.

16 Further conversation? Jay?

17 MEMBER FELDMAN: Okay. Thank you.

18 So this is a similar conversation to magnesium  
19 oxide, on steroids, though, this time. I  
20 think there is concern, especially on this,  
21 that we get into this treadmill effect where  
22 unless we have an expiration date on this

1 material -- we do a couple of things, and I'm  
2 not going to go through the whole explanation  
3 that I just did on magnesium oxide.

4 But one of the things that we have  
5 been clear on with antibiotics is where there  
6 was clarity. It's a really clear statement by  
7 the Board that this material needs research  
8 attention and research dollars and investment  
9 in alternatives and transition tools and, you  
10 know, all of the issues around humane  
11 treatment of animals. That without clarity  
12 from the Board we don't really see this -- I  
13 don't see this thing moving off of this  
14 dependency that we all, I believe, think we  
15 should try to get away from.

16 Now, remember that the petition  
17 process -- and we've seen this with a number  
18 of materials -- where an expiration date is  
19 set, the users of the material come back and  
20 they get -- the petitions are extended,  
21 similar to the sunset process extending,  
22 previously extending allowances on the

1 national list.

2 This happened at least twice,  
3 definitely twice with all of the antibiotics  
4 back in 2008, 2011, where the user community  
5 came -- and the research community came to the  
6 Board and said, "We need an extension." And  
7 those extensions were granted for a reasonable  
8 amount of time.

9 So I would like to introduce a  
10 motion, or someone else among those who feel  
11 this way, I'd like to hear some discussion on  
12 this about, you know, removing this -- there  
13 are a couple of ways we could do this -- refer  
14 this back to the subcommittee to -- with the  
15 instructions to bring to the Board a proposal  
16 to -- just as it's written, the current  
17 proposal, with an annotation that allows this  
18 material to expire after a five-year period,  
19 after the publication of the final rule by the  
20 department.

21 So I guess the question is, for  
22 me, how do we best promote and advance

1 alternatives and research into alternatives so  
2 that we can reduce and hopefully eliminate  
3 reliance on this material? And how do we  
4 expedite that rather than -- you know, this is  
5 one of those issues that has been around this  
6 Board, kicking around for about a decade or  
7 more. And so, you know, I believe we have to  
8 keep moving in that direction of restricting  
9 it and helping to attract research dollars to  
10 the alternatives.

11 CHAIR STONE: Tracy?

12 MEMBER FAVRE: It's way too early  
13 to sit and be lectured to this morning. I  
14 call the question.

15 CHAIR STONE: The question has  
16 been called on the original motion.

17 MEMBER FELDMAN: Well, then, I  
18 would have to appeal to the Chair the calling  
19 of the question. I think more discussion --  
20 I apologize that you felt lectured to, but  
21 this is for many -- as you heard in testimony,  
22 this is connected to a whole range of issues

1 that are important, and having an expiration  
2 date is a critical mechanism.

3 MEMBER BONDERA: I second that.

4 CHAIR STONE: So the question has  
5 been called. Nick?

6 MEMBER MARAVELL: What happens if  
7 this question is called and it does not  
8 prevail? Can another motion be made?

9 CHAIR STONE: I would entertain  
10 another motion.

11 MR. McEVOY: You can't -- the only  
12 proposal that you can vote on here is the one  
13 that has been published. So the -- you have  
14 an option to refer this back to the  
15 subcommittee, but if -- the only proposal is  
16 the one that's published. There is no  
17 alternative.

18 MEMBER MARAVELL: How would we  
19 refer this back to subcommittee?

20 MR. McEVOY: How would -- you  
21 would determine that that's the best way to  
22 move forward rather than voting on the

1 proposal is you want to refer it back to the  
2 subcommittee.

3 MEMBER MARAVELL: But do we have  
4 to do that -- if we vote on this motion now,  
5 and the motion does not pass, can we still  
6 make a motion to refer it to subcommittee?  
7 I'm just not familiar with procedure.

8 MEMBER BONDERA: Yes. That's a  
9 Robert's Rules question.

10 MEMBER MARAVELL: If somebody can  
11 answer. I'm just asking for clarification.

12 DR. BRINES: Sorry. So the  
13 question is whether, if someone moves the  
14 previous question and you vote on the motion,  
15 whether it can be then motioned back to  
16 committee?

17 MEMBER MARAVELL: I think that --  
18 the question specifically is, if we are to  
19 vote on the proposal as contained in the  
20 committee recommendation, and that proposal  
21 does not prevail, it fails, can another motion  
22 be introduced at that time to refer it back to

1       subcommittee for additional work?

2                   DR. BRINES: I think at that point  
3       it would be off the table.

4                   MEMBER MARAVELL: So a motion --

5                   MEMBER FELDMAN: Get a  
6       reconsideration motion, though, to bring it  
7       back for reconsideration, with an amendment to  
8       refer it back to committee?

9                   DR. BRINES: Yes. It would have  
10      to be a motion for reconsideration by somebody  
11      who was on the prevailing side.

12                  CHAIR STONE: And Lisa did advise  
13      me that the -- when the question is called, it  
14      has to be seconded and approved.

15                  DR. BRINES: By a two-thirds  
16      majority to end debate.

17                  CHAIR STONE: Okay.

18                  DR. BRINES: Since there was an  
19      objection, you might want to go through that  
20      process.

21                  CHAIR STONE: Right. Okay.

22                                So the question was called. It's

1 on the table first. So is there a second to  
2 calling the question?

3 MEMBER MARAVELL: I have one more  
4 point of clarification --

5 CHAIR STONE: Go ahead.

6 MEMBER MARAVELL: -- of Lisa's  
7 description, because I'm not a parliamentarian  
8 here, so -- so when you say a motion to  
9 reconsider would be what would be possible by  
10 someone who was on the prevailing side, what  
11 is the prevailing side if the motion fails?

12 DR. BRINES: Someone who voted  
13 against the motion.

14 MEMBER MARAVELL: And a motion to  
15 reconsider would allow what further action?  
16 Would that allow us to send it back to  
17 subcommittee? I'm looking for a way here to  
18 keep this vitally alive.

19 DR. BRINES: Yes. It's getting a  
20 little bit complicated. We might have to  
21 huddle on that before I give you a definitive  
22 answer.

1                   MEMBER MARAVELL: Well, would it  
2                   be best to have that huddle before we go down  
3                   any further this road? I'd submit that to the  
4                   Chair.

5                   CHAIR STONE: So we have to finish  
6                   the question question, but maybe we should  
7                   take a short break and let the  
8                   parliamentarians discuss where we are and  
9                   where -- the options to go forward. So we'll  
10                  come back in 10 minutes.

11                  Thanks.

12                  (Whereupon, the proceedings in the foregoing  
13                  matter went off the record at 9:43 a.m. and  
14                  went back on the record at 9:53 a.m.)

15                  CHAIR STONE: Okay. The  
16                  discussion was that, first, when someone calls  
17                  the question -- this is a broader sort of a  
18                  thing -- when someone calls the question, they  
19                  don't have autonomy to stop the debate. The  
20                  question has to be seconded and approved by a  
21                  two-thirds majority.

22                  I know that in lots of settings in

1 boards that we're on, without this much  
2 attention being paid to them, that often it  
3 works that way. So I'm glad to know that  
4 that's the way this Board operates. So just  
5 for the future.

6 Tracy?

7 MEMBER FAVRE: In the interest of  
8 continuing the conversation, I will withdraw  
9 my call for the question, and I would like to  
10 encourage this Board to consider the motion as  
11 it exists from the proposal.

12 Thank you.

13 CHAIR STONE: Okay. Thank you for  
14 that.

15 So there is two options. We can  
16 vote as is. If there is a motion made to  
17 refer this back to committee, technically a  
18 motion to refer is a simple majority, not a  
19 two-thirds majority. So that is important for  
20 the other, we think, referrals later on our  
21 agenda. That can be a simple majority, and we  
22 truthfully don't have to do the go-arounds

1 unless we choose to.

2 Tracy?

3 MEMBER FAVRE: In regards to the  
4 current motion that came from the proposal, as  
5 I understand it, the objection is really about  
6 making sure that we have a hard deadline on  
7 it, so that we are not in the same position as  
8 we have been with other materials where they  
9 just keeping getting extended over and over  
10 again.

11 I understand the desire to want to  
12 try to make sure that this doesn't continue to  
13 happen on materials. However, I think it's  
14 really important, particularly for this  
15 proposal, that we give some indication to the  
16 producers out there that we do intend to come  
17 up with a compromise that will allow them to  
18 work through their issues.

19 For those of you that might want  
20 to stand on principle on the removal of  
21 synthetic methionine, I understand that  
22 desire, and I applaud that desire. But if it

1 comes at the expense of animal welfare, I say  
2 shame on you; that's inappropriate. It's not  
3 what we stand for as organic producers. And  
4 I would really like to see the proposal, and  
5 the motion as it stands, go through, so that  
6 we have a workable solution for poultry  
7 producers.

8 Thank you.

9 CHAIR STONE: Okay. There's one  
10 other aspect to this relative to the magnesium  
11 oxide. The minority opinion had it in there  
12 -- a hard date -- so it was allowed to be  
13 voted on, because it was in play, if you will,  
14 as part of the -- as part of the  
15 recommendation, if you will. In this case,  
16 that is -- that is not the case with  
17 methionine.

18 So the program has determined that  
19 to be a substantive change, and, therefore, it  
20 would not be allowed as an amendment to this  
21 motion based on a technicality.

22 Nick?

1                   MEMBER MARAVELL:  As I stated  
2                   yesterday, I am in favor of the proposal, but  
3                   I have reservations.  And I think that it  
4                   would be advisable, in my opinion, not to let  
5                   this proposal run the risk of not passing.  I  
6                   think it's a good proposal, but I think that  
7                   there has been a history of this Board, in  
8                   dealing with methionine, and it has been to  
9                   reevaluate methionine in a very serious way.  
10                  And I think that putting a five-year  
11                  expiration date is something that the Board  
12                  should consider.

13                         And so if referring it back to  
14                         committee is the only way to achieve that, I  
15                         think it's unfortunate.  I mean, under  
16                         previous -- what should I say -- under  
17                         previous Board meetings we have been able to,  
18                         for example, in Seattle set an expiration  
19                         date.  But I'm not quibbling with the  
20                         procedure; I'm just saying it's unfortunate  
21                         that this procedure is going to take more  
22                         time.  But I think that the Board should have

1 the opportunity to consider a fixed end date,  
2 and I think that would also improve the  
3 chances of putting a signal out to the  
4 research community that this is indeed a very  
5 prudent investment for future study and for  
6 innovation.

7 So I don't want to see anything  
8 adverse happen here. I simply would like the  
9 Board to have that opportunity. So I would  
10 support sending this back to committee to  
11 consider some form of a mandate.

12 And I am not a parliamentarian,  
13 and so I leave it up to the others here to say  
14 what would be the best way to pursue that,  
15 that that would be my -- my desire.

16 CHAIR STONE: Thank you, Nick.

17 Others? Francis, I'm sorry.

18 MEMBER THICKE: First, I need a  
19 clarification. I don't know for sure -- if  
20 the motion fails, can there be a motion made  
21 to refer it back to committee by one of the  
22 people who --

1 CHAIR STONE: No, sir.

2 MEMBER THICKE: -- prevailed?

3 CHAIR STONE: No, sir. If the  
4 motion fails, it's done.

5 MEMBER THICKE: Okay.

6 CHAIR STONE: Jean?

7 MEMBER THICKE: Well, I'm not --  
8 can I continue, please?

9 CHAIR STONE: Yes. I'm sorry.  
10 I'm sorry.

11 MEMBER THICKE: I just want to  
12 make a statement, though. So I've been on the  
13 fence on this issue. I see the need to take  
14 care of the animals, no question about it, and  
15 make sure they have adequate methionine.  
16 However, I see a need to keep the pressure on  
17 industry.

18 My concern is that a yes vote will  
19 take that pressure off again, and it's going  
20 to -- it's not going to accomplish that  
21 objective.

22 I would like to see that go to an

1 average of the lifetime of the flock.

2 However, I think we need a hard expiration  
3 date. And so if this fails, I would like to  
4 bring forth another -- a new proposal to the  
5 subcommittee for a five-year expiration back  
6 in subcommittee.

7 CHAIR STONE: And, Lisa, correct  
8 me if I'm wrong, but that would require a new  
9 petition?

10 DR. BRINES: Yes, that's right.  
11 Normally, once the petition is voted on at the  
12 Board meeting, in order to raise the issue  
13 again a new petition would be submitted with  
14 new information that wasn't previously  
15 considered by the Board.

16 CHAIR STONE: And I could bring  
17 that petition forward with a five-year  
18 deadline, which is new information, right?

19 DR. BRINES: Yes. We would have  
20 to look at that. I mean, the --

21 MR. McEVOY: Well, it would be a  
22 new petition, so you could -- it would just be

1 a new petition and would start through the  
2 process all over again.

3 CHAIR STONE: And, Zea, with --  
4 question, Zea. With the new petition,  
5 abbreviated petition process, would that come  
6 into play here?

7 MEMBER SONNABEND: Well, of course  
8 the new petition process would make it a  
9 little bit easier to petition, because you are  
10 petitioning for an annotation rather than for  
11 a whole new thing on the national list.

12 However, just asking for a  
13 five-year expiration isn't really new  
14 information, in my opinion. And so the -- but  
15 it's not my call, so the Department would have  
16 to evaluate whether a five-year expiration is  
17 really new enough information to bring a  
18 petition before the Board in any sort of  
19 priority.

20 CHAIR STONE: Jay?

21 MEMBER FELDMAN: Well, we've had a  
22 finding by the program that it's substantially

1 new. So in some respects that sets the  
2 framework for it being new information.

3 I think the issues around research  
4 and the ability to move or incentivize the  
5 research community and innovators to come up  
6 with new ideas is something that hasn't been  
7 addressed by the petition in the past. So I  
8 would argue that if Francis or another Board  
9 member would come forward with a petition and  
10 a five-year limitation or expiration, whatever  
11 you call it, I hope the program would view  
12 that as a new petition with new information.

13 CHAIR STONE: Jean?

14 MEMBER RICHARDSON: I would like  
15 to see us vote in favor of this  
16 recommendation. We have round and round and  
17 round on it for an awful long time. And I am  
18 concerned, obviously, for the health of the  
19 birds, their nutrition needs. And the breeds  
20 that we're using nowadays, whether they're  
21 organic or conventional, they're all -- their  
22 needs are such that the methionine presently,

1 the way we're doing organic agriculture, is  
2 really needed.

3 And to keep on delaying it by  
4 these mechanisms really is sort of a concern  
5 for me. I know that we're all a bit  
6 aggravated that the sunset and all that stuff  
7 has taken place, and we're getting edicts from  
8 Washington. I mean, I've been as frustrated  
9 as the rest of us, although, you know, I stay  
10 quiet and well behaved sometimes.

11 But I don't think that we should  
12 -- we should use our concerns and the politics  
13 of all of that at the expense of things that  
14 are needed for the organic industry. I  
15 believe that five years from now the sunset  
16 review that the methionine will get under the  
17 normal procedures that it will go through  
18 under the new sunset, or whatever happens to  
19 it in the next few months or years, will  
20 adequately address the concerns of both the --  
21 of both sides of the issues, and that we will  
22 get a reasonable -- I mean, an excellent

1 review, no matter which one of the sunset  
2 things we end up with in the next few years.  
3 But I'm assuming this one will continue on the  
4 way it is.

5 CHAIR STONE: So I've got two or  
6 three hands. I would also suggest that the  
7 irony here is by the time a petition is put  
8 forth, reviewed by the program, sent to the  
9 committee, we are going to add a year or much  
10 more before we have the opportunity to  
11 readdress this issue.

12 I've got Zea, and then Nick, and  
13 then Harold, and then Tracy. So Zea.

14 MEMBER SONNABEND: Okay. Thank  
15 you. I agree with Jean pretty much  
16 completely. And along the lines of what Mac  
17 said, I just want to add that that year or two  
18 that is added is going to keep a policy going  
19 that does not have the best interest of the  
20 birds at heart, and, as we have heard  
21 testimony for, is not working and creating  
22 conditions where the animals are not happy and

1 healthy.

2           And so I really think we need to  
3 make this change, so that the life of the  
4 flock average can be implemented in the field.  
5 But I do suggest that an alternative to  
6 finding -- to submitting a new petition and  
7 delaying the whole thing would be to -- for  
8 people who want it to go back to subcommittee  
9 to prevail upon the subcommittee before we  
10 vote to withdraw it and take it back, and I  
11 don't know exactly if that's amendment or  
12 referral motion with a majority, but to do  
13 that before we vote to see if it can go back  
14 to the committee rather than trying to do  
15 something after we vote and then repetition,  
16 which, you know, as was mentioned adds years.

17           CHAIR STONE: Nick?

18           MEMBER MARAVELL: Yes. Zea  
19 anticipated what I wanted to say. I'd like to  
20 state it the following way. I think that  
21 under the circumstances the best thing to do  
22 would be to have a vote on whether or not to

1 send this back to subcommittee. If that vote  
2 prevails, then that's what happens. If that  
3 vote does not prevail, then we should be able  
4 to vote on the petition as is.

5 So could I simply get  
6 clarification from the Chair if that's a  
7 possible scenario, and then I would  
8 respectfully ask that we withdraw the motion  
9 and try to go that way. But -- so could I  
10 find out if that scenario I outlined is  
11 possible, if first we vote on referral to  
12 committee; if that fails, then we can vote on  
13 the motion as is.

14 CHAIR STONE: Yes, we can do that.  
15 And the referral is a simple majority, I  
16 remind you.

17 MEMBER MARAVELL: Is there any  
18 willingness on the part of the person who made  
19 the motion to entertain that procedure?

20 CHAIR STONE: Why don't we get a  
21 little more input. I've got several hands up  
22 with the current conversation. So now I'm

1 back to Harold.

2 MEMBER AUSTIN: You know, I think  
3 we saw some pretty good testimony, both  
4 through written and through oral, on this  
5 issue. And I think for me the most important  
6 part of it right now is the health and  
7 well-being of the flock. You know, I know  
8 we've dealt with this material. I think we've  
9 made tremendous progress over the last couple  
10 of years since I've been on the Board, and I  
11 applaud the members of the Livestock Committee  
12 for that.

13 But I think right now the animal  
14 welfare probably should be the one thing that  
15 we're looking at. I mean, we saw the photos,  
16 we saw the pictures, and we know that the  
17 testimonies were coming from the heart. I  
18 think to do anything other than that I think  
19 would be turning our backs on that group of  
20 organic stakeholders that have brought us  
21 their heart and souls and their testimonies to  
22 this committee and to this Board.

1           The other thing that I would like  
2           to just briefly touch upon is I really am  
3           appalled by the process of wanting to do the  
4           five-year extensions and deadlines. Having  
5           lived through it with the antibiotics, it  
6           takes the materials outside of the scope of  
7           the sunset process. I think with the sunset  
8           process, as we showed yesterday in the  
9           Handling Subcommittee, with the two-step  
10          process that we are now under, gives us a very  
11          solid mechanism to take in -- in a material  
12          like this -- it looks like we're having a  
13          separate Board meeting over in the corner.

14                 But I think we have the vehicle in  
15          place. I think we can have solid testimony,  
16          solid discussion, as these materials come up  
17          for sunset review. It's a little distracting  
18          with the guys in the corner, but it's okay.

19                 Anyway, Mac, that's my two cents.  
20          I just think stepping outside of the sunset  
21          process with these continued annotation and  
22          expiration dates is a travesty to the process

1       itself.

2                   CHAIR STONE:   Tracy?

3                   Gentlemen, if you all would like  
4       to join us, we're having a discussion here.

5                   MEMBER FAVRE:   I would like to  
6       state for the record that I would certainly  
7       prefer to see this referred back to committee  
8       if I thought this proposal was going to fail.  
9       I'm not convinced of that yet.

10                   But I want to address a comment  
11       that was brought up in regards to -- I think  
12       it was Francis made the comment about keeping  
13       the pressure up. I said this the other day in  
14       the comments, and I'll reiterate it. The  
15       broiler people are already unhappy at the two  
16       pounds, even as an average over the life of  
17       the bird. It is not sufficient for their  
18       needs. They are already desperately looking  
19       for alternatives to augment what they are  
20       going to be currently allowed even with this  
21       proposal.

22                   There is continued pressure on

1       them to find solutions. By voting this  
2       proposal through, we are not letting up the  
3       pressure. They are continuously looking for  
4       alternatives. There is progress on the  
5       research right now.

6                   That is not going to suddenly stop  
7       just because we have basically changed the  
8       application of the limits. The application of  
9       the limits, in my mind, were completely about  
10      animal welfare. As I said the other day, we  
11      have created this circumstance by refusing to  
12      allow an omnivore to eat like an omnivore.

13                   And I think that we need to  
14      recognize that this is more about our  
15      frustration and consternation with the revised  
16      sunset policy rather than with the proposal  
17      itself. And I, along with Harold, would like  
18      us to have faith in the system. If we choose  
19      at the time of sunset to bring forth a motion  
20      to remove a material, we have the option to do  
21      that.

22                   We have the control and the

1 ability to review the material in whatever  
2 depth and detail we wish to at sunset. So  
3 let's please not stall an issue and a proposal  
4 out that needs to be brought forward and we  
5 need resolution on in order to comfort  
6 ourselves with our frustrations about sunset.

7 CHAIR STONE: We've got Colehour,  
8 then Francis, then Wendy.

9 MEMBER BONDERA: Yes. I don't  
10 know, in response to Tracy's comment, if Mr.  
11 Chair, you would like to engage in what we  
12 have done here before, a quick straw poll of  
13 where -- like she indicated, of the motion.

14 CHAIR STONE: Not yet.

15 Francis?

16 MEMBER THICKE: Well, first, I'd  
17 like to make it clear that for me this is not  
18 about procedure, not about sunset. It's about  
19 I think we need to keep that pressure on. And  
20 I -- without a hard expiration date, I'm not  
21 going to be able to support it.

22 So I make a motion we refer it

1 back to committee.

2 CHAIR STONE: I have a motion to  
3 refer it back to committee. Is there a  
4 second?

5 MEMBER MARAVELL: I second that  
6 motion.

7 CHAIR STONE: Second by Nick.  
8 Further discussion?

9 (No response.)

10 I was going to offer an option,  
11 based on the animal welfare of this issue,  
12 that we could vote the motion -- we could  
13 allow the birds to have -- allow the growers  
14 to manage their birds in a more appropriate  
15 manner. And a petition could be brought  
16 forward for a hard-fast date, while the birds  
17 are being managed in a better condition as an  
18 option here.

19 Any other discussion on the motion  
20 to --

21 MEMBER FELDMAN: I'm sorry. Could  
22 you repeat that?

1                   CHAIR STONE:  Someone could bring  
2                   forth a petition from the committee to create  
3                   a hard-fast date before -- while the birds are  
4                   being properly, or more appropriately fed, I  
5                   should say, as a way to get the birds' welfare  
6                   taken care of while we debate the date.

7                   Other discussion?  John?

8                   VICE CHAIR FOSTER:  I like that  
9                   idea.

10                  CHAIR STONE:  So we have a motion  
11                  on the floor, and I wish we could continue the  
12                  debate with the Colehour thought of straw  
13                  vote, if you would, to see where -- again, I  
14                  think there are several of us that are very  
15                  concerned about the welfare of the animals,  
16                  and they are the ones that are going to suffer  
17                  here while we tinker with the process of a  
18                  date and motivation for change.

19                  Francis?

20                  MEMBER THICKE:  Could you clarify  
21                  -- so your suggestion is that we vote for the  
22                  original petition -- original proposal, and

1 then meanwhile we pursue a petition for a hard  
2 date?

3 CHAIR STONE: Yes, sir. I think  
4 that's a --

5 MEMBER THICKE: Could I ask the  
6 program if they would be willing to consider  
7 such a petition?

8 DR. BRINES: Yes. I think with  
9 any petition that we receive we look at the  
10 eligibility and the complete list guidelines.  
11 For things that have been previously  
12 petitioned, we evaluate any previous Board  
13 recommendations to ensure there is new  
14 information. So if there's new information  
15 which is a basis for the petition, we would  
16 forward that to the subcommittee for further  
17 deliberation.

18 CHAIR STONE: Okay. Other  
19 conversation?

20 Jay?

21 MEMBER FELDMAN: I can't recall  
22 what you said about Colehour's proposal, how

1     you --

2                   CHAIR STONE:  He was suggesting a  
3     straw poll to see which way we think this  
4     thing is going before we make some alternation  
5     motion.  But now we have a motion on the  
6     floor.

7                   MEMBER FELDMAN:  Are you in favor  
8     of doing that or --

9                   CHAIR STONE:  I'm okay with that.

10                  MEMBER FELDMAN:  Yes.

11                  CHAIR STONE:  I'm not sure exactly  
12     how to do that.  If there is a -- if it were  
13     made to -- if the motion that's on the floor  
14     were to be withdrawn, it would give us more  
15     flexibility in crafting a fix here, frankly.

16                  MEMBER THICKE:  So I will  
17     temporarily withdraw that emotion.  Motion.

18                                 (Laughter.)

19                  MEMBER MARAVELL:  I second that  
20     emotion.

21                                 (Laughter.)

22                  CHAIR STONE:  Good.  Okay.  So

1 with the options that I see -- and so everyone  
2 at this table and in this room is getting the  
3 fact that there needs to be some pressure, if  
4 you will, and how best to bring some closure  
5 to this, as I stated yesterday, this ad  
6 nauseam debate by the Board of this material.  
7 But the welfare of the birds that are out  
8 there is happening while we are doing what  
9 we're doing.

10 So I don't see any problem with  
11 someone coming forth with some hard date. If  
12 that were to be a workable solution, we can  
13 get the birds taken care of. So I'm  
14 suggesting that with that framework I ask --  
15 I guess it's a show of hands? Is that how a  
16 straw poll -- a show of hands that if we work  
17 to -- if the subcommittee works to petition  
18 this Board -- so it doesn't have to come from  
19 the community.

20 We're doing this ourselves. We're  
21 managing the conversation ourselves with the  
22 amended petition process that Zea and we voted

1 on yesterday. It's an internal conversation  
2 that -- but we get the birds in a better  
3 condition. How many would be in favor of  
4 that?

5 Francis?

6 MEMBER THICKE: You're sort of  
7 insinuating that the program is going to  
8 accept that discussion in this -- that  
9 petition. And I'm a little unclear that the  
10 program is going to accept that petition, so  
11 --

12 MEMBER SONNABEND: And I have a  
13 point of clarification about that, too, that  
14 I'd like to ask the program.

15 CHAIR STONE: Please do.

16 MEMBER SONNABEND: I mean,  
17 normally, when we approve a recommendation  
18 such as the revised petition process, we have  
19 to wait until it's final and comes out in the  
20 Federal Register that we can streamline a  
21 petition for an annotation change.

22 So if the Department says now,

1       yes, if it's just a petition for an annotation  
2       change, we will follow the guidelines that are  
3       in the NOSB recommendation to only answer, you  
4       know, six of the questions instead of all 13,  
5       then that would work. But if we have to  
6       operate under the old thing where you have to  
7       do a complete full petition for even an  
8       annotation change, then it becomes a lot more  
9       difficult, and so I'd like the program to  
10      clarify that, please.

11                   MR. McEVOY: Well, first of all,  
12      if there is a recommendation on methionine  
13      that goes to the program, then the program  
14      would look at that recommendation to determine  
15      what's the best course to move forward,  
16      whether or not to go into rulemaking, to make  
17      the changes to the -- to the rates of  
18      methionine allowed in organic poultry  
19      production or not.

20                   So remember that this is a  
21      recommendation to the Board that goes to the  
22      USDA for consideration of how best to proceed

1 and respond to that recommendation.

2 In terms of petitions, there is --  
3 we receive many petitions, and they are  
4 evaluated to determine how to move them  
5 through the process. So we would consider a  
6 new petition just like any other petition, and  
7 do it in a fair and complete manner, like we  
8 do for other petitions.

9 MEMBER SONNABEND: Well, but what  
10 we approved yesterday changes the requirements  
11 of a new petition for an annotation change a  
12 bit.

13 MR. McEVOY: Again, that's a  
14 recommendation back to the program, and we'll  
15 -- it seems like a great recommendation. We  
16 have no concerns about it, but there is a  
17 process for us to then get that new -- that  
18 recommendation implemented.

19 CHAIR STONE: And subsequent time  
20 delay while that's happening as far as -- so,  
21 Francis, as far as there is still a delay,  
22 there is still time, if there's -- if it's two

1 years before a motion to set a date can be  
2 realized, all the way to the table at this  
3 stage of the process, then the date might be  
4 adjusted accordingly to give time for  
5 rulemaking for that date to be effective. It  
6 wouldn't have to be five years after that  
7 date; it could be some other, quote,  
8 "arbitrary date."

9 So why is everybody looking at me?

10 No.

11 So I guess I'd like to -- with  
12 that in mind as an option, I'd be curious --  
13 so there's a general sense that the birds are  
14 the ones that are a concern here while we do  
15 our administrative duties as Board members.  
16 Are people willing to move this recommendation  
17 for the welfare of the animals while the  
18 administrative changes can be implemented as  
19 discussed on hard date issue? I see seven  
20 hands.

21 So I feel we should refer this --  
22 I feel the motion to refer it back to

1 committee is a shorter timeframe to  
2 potentially get the birds -- the producers the  
3 ability to effect the rations for the birds,  
4 would be the shortest timeframe would be to  
5 refer it back to committee to come back in the  
6 fall.

7 Is that right? Nick?

8 MEMBER MARAVELL: Well, I'm going  
9 to make this comment, and if the program does  
10 not agree I don't choose to pursue it. But my  
11 understanding is that in the statute that we  
12 are, as a Board, entitled to set the  
13 procedures for petitions. And it appears that  
14 this is a petition, and that some of our  
15 procedures are being set by the program.

16 Now, I'm asking this very  
17 respectfully, that if the -- if the program  
18 could see their way clear, that we could do  
19 both right now -- approve the motion as  
20 proposed and add -- under a procedure that we  
21 would sanction, and add the extension through  
22 a five-year period -- I would consider that in

1 the best interests of everyone.

2 But, as I said, this would have to  
3 be with the concurrence of the program, if  
4 they could see their way clear to do that. I  
5 do not think that this would be something that  
6 we would set -- that we would do this on  
7 everything, but this is something that we  
8 would want to consider doing in this specific  
9 case to accomplish the will of everybody on  
10 the Board.

11 So I just respectfully ask that  
12 question.

13 CHAIR STONE: We're going to take  
14 a don't-leave-the-room five-minute recess,  
15 please.

16 (Whereupon, the proceedings in the foregoing  
17 matter went off the record at 10:25 a.m. and  
18 went back on the record at 10:30 a.m.)

19 CHAIR STONE: The program was  
20 asked for clarification or -- why don't you  
21 all tell us what you huddled about?

22 MR. McEVOY: Yes. Okay. So it's

1 our role at AMS to ensure the fairness of the  
2 whole process, that everybody has the same  
3 access to information, the public has the same  
4 process, whether they're here at the meeting  
5 or just anywhere in the United States.

6 So last summer when we were  
7 talking with the Board about the upcoming  
8 changes to the sunset process, we talked about  
9 changes to the -- updating the petition  
10 guidelines. We have been supportive of an  
11 expedited, streamlined way for petitions to  
12 remove, so we have been supporting that  
13 process.

14 We support the recommendation that  
15 was passed yesterday, and we have to implement  
16 that. The current petition guidelines were  
17 published in the Federal Register Notice in  
18 2007. And in order for us to implement these  
19 new recommendations that we support, we have  
20 to publish a new Federal Register Notice, so  
21 everyone understands what that process is and  
22 has the same access to the information.

1                   That, I understand, is going to be  
2 expedited. And you'll remember this is the  
3 glacial speed of the python that we are  
4 talking about, but -- so an expedited move  
5 through the python is for a couple of months  
6 before we'd be able to publish a new Federal  
7 Register Notice that would then take the place  
8 of the 2007 petition guidelines that are the  
9 current ones that are being operated under.

10                   So we support the recommendation.  
11 We have to go through a process to implement  
12 it. I hope that answers your question.

13                   MEMBER MARAVELL: Not directly,  
14 unfortunately.

15                   CHAIR STONE: I'll attempt an  
16 interpretation, that a petition by a  
17 subcommittee member could be brought forth  
18 during this term to be effective at the next  
19 Board meeting, because there is interest to  
20 make that happen, and it's a clear and open  
21 process. It just has to be on the work plan  
22 of the subcommittee.

1 Nick?

2 MEMBER MARAVELL: So to clarify,  
3 then, if we add this today, we will be  
4 discussing subcommittee work plans. If we add  
5 this to the work plan, the program anticipates  
6 putting out new guidelines for the petition  
7 process. That would allow the subcommittee to  
8 submit a petition for the very next meeting,  
9 and that petition process could be somewhat  
10 abbreviated because it would only be a  
11 petition for an annotation.

12 And now I'm going to make a leap  
13 of logic here, but that this would basically  
14 affect the same -- similar thing as referring  
15 this back to subcommittee. But it would allow  
16 more flexibility in providing methionine,  
17 synthetic methionine, to poultry right now.

18 I understand all of that. My  
19 original question was a little bit different,  
20 but I understand all of that. My original  
21 question was, can we do it all right here,  
22 right now? But it does not appear that that

1 was the answer from the program.

2 So I -- but I appreciate your  
3 willingness to accommodate, as much as you  
4 can, what it is that the Board might want to  
5 achieve.

6 CHAIR STONE: And there is one  
7 other step to the way I characterize it is the  
8 petition has to be accepted and forwarded to  
9 the subcommittee, so there is another time lag  
10 in there, not just as clean as I characterized  
11 it a moment ago.

12 Colehour?

13 MEMBER BONDERA: Thank you, Mr.  
14 Chair. And I just wanted to -- and I  
15 apologize if I should have done it before we  
16 had our last little break -- but I really  
17 second what Nick put forth as what I see as an  
18 opportunity for simplification. I really  
19 think this idea of a five-year expiration  
20 amendment does not affect any of the involved  
21 interests to a great extent, and it does  
22 exactly what everybody said regarding -- it's

1 a minor change that really allows for the  
2 topic to be dealt with.

3 I really feel that within OFPA the  
4 materials face a five-year sunset review, and  
5 that's the reason that we're, you know, like  
6 it says, reduce the -- you know, the step-down  
7 process with methionine requires reducing it,  
8 and I think that adding a five-year expiration  
9 date does not -- and I apologize if, after the  
10 fact, based on the program's huddle that they  
11 have determined otherwise -- it does not  
12 substantially alter the subjects or issues  
13 involved in the proposal in my opinion. And  
14 I just really feel like we have this  
15 opportunity to make it simple, frankly.

16 CHAIR STONE: Francis?

17 MEMBER THICKE: Well, I would have  
18 to agree. If you look at the yes and no vote  
19 on the initial -- original petition, this --  
20 what we're talking about is right in the  
21 middle. It takes both sides and brings it  
22 right to the middle. It's not really new

1 information. It's not anything radical. If  
2 it were outside of one side or the other, I  
3 could understand it. But this is just a --  
4 kind of a little compromise here. That's  
5 nothing new.

6 So I think it's overly rigid,  
7 frankly. I'm concerned about that. And I  
8 actually have to say I didn't understand the  
9 whole circuit of logic about the petitions.  
10 Maybe I'm too new to understand all that.

11 So I don't know if I'm at the  
12 point where I should now introduce that motion  
13 to bring it back to the subcommittee, or if  
14 the other alternative, which I didn't  
15 understand, is a better one. Maybe somebody  
16 can help me out here.

17 CHAIR STONE: So, Tracy? So the  
18 other alternative is to approve the motion on  
19 the table, knowing that the subcommittee is  
20 going to bring a petition as soon as they can  
21 to this Board to set a hard-fast date, or it  
22 goes back to -- that we make a -- we move it

1 back to Committee and it comes back in the  
2 fall with this same debate to be had.

3 Tracy?

4 MEMBER FAVRE: Just a point or a  
5 question for the program. Do we have the  
6 option to appeal the decision of it being a  
7 substantive change, to put in a hard and fast  
8 date in the motion? I mean, can we get some  
9 information about that?

10 MR. McEVOY: Can you repeat the  
11 question, please?

12 MEMBER FAVRE: Several of us here  
13 feel as though, since it's going to sunset in  
14 five years anyway, putting a hard and fast  
15 date of five years into the motion wouldn't  
16 be, in my opinion, a substantive change. It  
17 may be different from what was posted, but  
18 it's not really different in practicality as  
19 to what would likely happen for the material.

20 I think we've heard from you that  
21 you feel that that is a substantive change,  
22 and so I'm asking if we can sort of appeal

1 that decision.

2 MR. McEVOY: Yes. It is  
3 definitely a substantive change. It's very  
4 different than what was proposed. What is  
5 proposed was a change to the annotation from  
6 the pounds per ton to an average over the life  
7 of the bird. There was no talk about an  
8 expiration date.

9 The process for -- of sunset  
10 review and renewal is that every substance  
11 that's on the national list is thoroughly  
12 reviewed by the National Organic Standards  
13 Board every five years. An expiration date is  
14 a very different effect than the sunset review  
15 and renewal process.

16 So no one had the opportunity to  
17 consider that in -- coming up to the meeting.  
18 There was no one that could submit written or  
19 oral public comments on that particular  
20 proposal, so it's definitely a substantive  
21 change that cannot be considered at this  
22 meeting. If you want to consider that, you

1 will have to go back to your subcommittee.

2 CHAIR STONE: Tracy? And we're --  
3 I'm watching the clock a little tighter here.

4 MEMBER FAVRE: Sorry. Just I  
5 think maybe an unintended consequence of this  
6 is that we are going to have -- as I  
7 understand from an earlier conversation, it  
8 was allowed on the other material because  
9 there was a minority opinion that stated that  
10 as a possibility. So I think potentially an  
11 unintended consequence of this decision is we  
12 might end up with minority opinions on every  
13 single material. That includes a hard stop as  
14 a suggestion.

15 So that's just something to think  
16 about. That's going to force us into  
17 potentially having minority opinions on every  
18 material if we're not careful.

19 CHAIR STONE: Okay. So we have  
20 two options. We can send it back to committee  
21 to come back with the variable rate and a  
22 hard-fast date in the fall, or we can approve

1 the motion on the table and come back as soon  
2 as we can with a hard-fast date to be voted on  
3 separately. So we can -- yes, they will be  
4 voted on together, if it goes back to  
5 committee. They will be voted on separately  
6 if we do it the second way.

7 Francis, and then I'm going to  
8 wrap up.

9 MEMBER THICKE: Okay. I make a  
10 motion that we refer this back to committee.

11 CHAIR STONE: I have a motion to  
12 refer this back to committee. Is there a  
13 second?

14 MEMBER MARAVELL: I second the  
15 motion.

16 CHAIR STONE: Even though -- is  
17 there more discussion? Nick?

18 MEMBER MARAVELL: Well, I would be  
19 willing to continue to work towards a solution  
20 that could be more expeditious. If there are  
21 other suggestions -- I thought Zea had one  
22 that would get us pretty close to that, but

1 I'm -- what I'm saying is I'm seconding this  
2 motion, but I'm also willing, if anybody has  
3 additional ways in which it appears that we  
4 could get to where we want to go, I'd be happy  
5 to consider those.

6 CHAIR STONE: So I'm thinking we  
7 can't craft that at the microphone, frankly.  
8 Jean?

9 MEMBER RICHARDSON: I'll be voting  
10 against the motion to send it back to  
11 subcommittee. I think a much more sensible  
12 alternative is to vote in favor of the present  
13 motion on the floor, thinking of the health of  
14 the birds over the long time and the need to  
15 spread out the methionine from the young  
16 months to the older ones, and allow the  
17 subcommittee to work on a petition.

18 CHAIR STONE: Jay? Last comment.

19 MEMBER FELDMAN: I'll be voting  
20 for the motion. I think separating these two  
21 -- unfortunately, though I'd like to see that  
22 as a viable option -- has too many unknowns

1 associated with it. We have already seen the  
2 difficulties of moving something through the  
3 regulatory process to final rulemaking. And  
4 given the way the straw vote went, it's  
5 unlikely that the motion for a five-year  
6 authorization would prevail -- a five-year  
7 expiration would prevail.

8 That's unfortunate. I think,  
9 again, the -- to remind you, the drafters of  
10 the law understood that it wanted to bring  
11 along as close to consensus of the group as  
12 possible, and this is just one of those hard  
13 examples. If we had a little more  
14 flexibility, as Tracy suggested, I think the  
15 process could go much more smoothly, and we'd  
16 only bring motions that are of a serious  
17 nature such as this to the full Board for  
18 consideration of expiration annotations.

19 CHAIR STONE: Okay. And I would  
20 also suggest that the -- if it does go back to  
21 the subcommittee, it can be brought forth in  
22 two separate motions, one for the variable

1 rate and one for a date. So it doesn't have  
2 to be coupled into one motion coming out of  
3 committee.

4 So with that, we said this is a  
5 simple majority. But because of the  
6 sensitivity of this conversation, I'm going to  
7 take a roll call vote, and we start with  
8 Wendy. This is to send it back to -- this is  
9 an amendment to send it back to committee.

10 MEMBER FULWIDER: Yes.

11 MEMBER THICKE: Yes.

12 MEMBER BONDERA: Yes.

13 MEMBER TAYLOR: Yes.

14 MEMBER FELDMAN: Yes.

15 MEMBER SONNABEND: I'm really  
16 confused, so I think I'm abstaining. Well,  
17 no.

18 CHAIR STONE: Your vote is no.  
19 Clarify, okay.

20 MEMBER SONNABEND: Yes, it's no.

21 (Laughter.)

22 MEMBER AUSTIN: No.

1 VICE CHAIR FOSTER: No.

2 SECRETARY WALKER: Yes.

3 MEMBER RICHARDSON: No.

4 MEMBER DICKSON: No.

5 MEMBER BECK: No.

6 MEMBER FAVRE: No.

7 MEMBER MARAVELL: Yes.

8 CHAIR STONE: Yes.

9 SECRETARY WALKER: I've got eight.

10 Eight. Eight yes.

11 CHAIR STONE: We have eight yes,  
12 seven no's. That's a simple majority, so it  
13 goes back to committee.

14 Thank you.

15 So having worked through that, we  
16 -- the next proposal, so if my notes are  
17 right, any of the motions that are -- any of  
18 the proposals that are -- there's a motion to  
19 refer back to committee, we can do in the form  
20 of a simple majority. I'm going to do, in  
21 essence of time, because we don't have much,  
22 I'm going to say yea and nay. If there's any

1 question of whether it's clear one way or the  
2 other, then we'll take a roll call vote, if  
3 that's acceptable.

4 Okay. Tracy, acidified sodium  
5 chlorite.

6 MEMBER FAVRE: Yes. Joe Dickson  
7 is the lead on this. Joe, I'm going to let  
8 you bring forth the motion, please.

9 MEMBER DICKSON: I'd like to make  
10 a motion to refer the proposal on acidified  
11 sodium chlorite back to the Livestock  
12 Committee.

13 MEMBER THICKE: I second.

14 CHAIR STONE: I have a motion and  
15 a second. Is there any conversation?

16 (No response.)

17 All in favor say aye.

18 (Chorus of ayes.)

19 Any opposed?

20 (No response.)

21 Hearing no opposed, motion  
22 carries.

1 Next?

2 MEMBER FAVRE: Okay. The next  
3 material is chlorine materials in aquatic  
4 livestock production. Again, Joe, you're the  
5 lead on this.

6 MEMBER DICKSON: I make a motion  
7 to refer the recommendation on chlorine for  
8 aquatic animal production back to the  
9 Livestock Subcommittee.

10 CHAIR STONE: I have a motion to  
11 refer it back to committee. Is there a  
12 second?

13 MEMBER RICHARDSON: Second.

14 CHAIR STONE: Second by Jean. Any  
15 further conversation?

16 (No response.)

17 All in favor say aye.

18 (Chorus of ayes.)

19 Any opposed?

20 (No response.)

21 Hearing no opposed, motion  
22 approved.

1 Next?

2 MEMBER FAVRE: Okay. Get the  
3 train rolling. The next one is tocopherols in  
4 aquatic animal protection. Colehour and I are  
5 the lead on that. Colehour, do you want to  
6 make the motion, or would you rather I do?

7 MEMBER BONDERA: Go ahead.

8 MEMBER FAVRE: Okay. I'd like to  
9 make a motion that we refer this proposal back  
10 to the Livestock Subcommittee.

11 CHAIR STONE: I have a motion to  
12 refer tocopherols back to the Livestock  
13 Subcommittee. Is there a second?

14 MEMBER BONDERA: Second.

15 CHAIR STONE: Second, Colehour.  
16 Any further conversation? Jay?

17 MEMBER FELDMAN: Yes. I was  
18 wondering if -- Jean, I don't know if you want  
19 to -- if you're interested in the language on  
20 instructions when we refer this back to  
21 subcommittee, if that's still something of  
22 interest. We had talked about a statement,

1       which I can read.

2                       So I'd like to propose an  
3       amendment, and I'm not sure I have the final  
4       version in front of me.

5                       MEMBER FAVRE:   Jay, I have the  
6       language if you want me to read it.

7                       MEMBER FELDMAN:   Okay.  Is that  
8       okay?  Thank you.

9                       MEMBER FAVRE:   There was language  
10      discussed that a motion be made to refer back  
11      -- the material back to the Livestock  
12      Committee, and that the subcommittee be  
13      instructed to reconsider its proposal and make  
14      a determination on the future action after the  
15      NOP publishes aquaculture final regulations.

16                      And, two, the Livestock  
17      Subcommittee requests and receives updated TRs  
18      as needed for aquaculture material use and  
19      revises the materials checklist in response to  
20      public comment and Board discussion from the  
21      spring 2014 meeting, which includes  
22      consideration of the regulations and the TR.

1           The Board would then welcome a  
2           proposal that integrates all views related to  
3           specific aquaculture systems and species.  
4           That was the crafted language.

5           I think, as part of this, I don't  
6           disagree in principle with all the language in  
7           this. I do feel like it's a little bit overly  
8           prescriptive. I took, and I think all the  
9           subcommittee took, extensive and detailed  
10          notes based on the comments we received  
11          yesterday. But it is our intention that we  
12          would be reviewing these materials in the  
13          context of the new standards when they come  
14          out. And I don't know if that gets you where  
15          you want to go or not, Jay.

16                   MEMBER FELDMAN: I'm not  
17                   comfortable with this level of prescription  
18                   either, although we added words like "as  
19                   needed." And I believe when this -- at least  
20                   the intent was when this was written was  
21                   intended to capture the conversation that we  
22                   all had. It wasn't intended to add anything.

1                   I think this would be helpful. I  
2                   mean, you know, some on the board have felt  
3                   that we should really get better petitions  
4                   from the petitioner. But this I think would  
5                   be a middle ground to at least codify what we  
6                   did discuss, and so it's on the record and in  
7                   some succinct form so people don't have to  
8                   wade back through the transcript to know what  
9                   the intent of the Board is. That was the  
10                  intent behind it.

11                  CHAIR STONE: Might I suggest that  
12                  this be a separate motion, separate from being  
13                  coupled to any particular material, as a -- so  
14                  that the subcommittee can address it, know the  
15                  intent of the Board, the intent of the  
16                  conversation is expressed in this, in general,  
17                  not coupled to any one material. Tracy?

18                  MEMBER FAVRE: Can we do that in  
19                  the form of a resolution after the proposal --  
20                  or the motion is made to return it to  
21                  committee?

22                  CHAIR STONE: I like that.

1                   Zea?

2                   MEMBER SONNABEND: So I don't even  
3 know if this motion is on the floor or not.  
4 But I am completely opposed to the  
5 prescription notion that the standards have to  
6 be out first, as I said the other day.

7                   CHAIR STONE: So, Jay, if you'll  
8 allow, let's move through the -- let's get the  
9 -- Colehour?

10                  MEMBER BONDERA: I'm not sure I  
11 agree with the process that's occurring. I  
12 personally was going to suggest that it be --  
13 this be added as a friendly amendment language  
14 to all of these, so we didn't have to discuss  
15 it every time and that it was considered as a  
16 friendly amendment.

17                  But if we're going to vote on it  
18 as a resolution, and it's not going to be done  
19 in this kind of way, the referral back to  
20 committee, which is just a simple majority,  
21 then I think we are facing a different  
22 question as a resolution and a longer

1 conversation, and I'm not sure that that's  
2 going to be as smooth or comfortable.

3 CHAIR STONE: So a motion was made  
4 to couple this to each of the following  
5 materials, not the first two.

6 MEMBER FAVRE: Point of order. I  
7 don't know that Colehour actually made a  
8 motion. Did he?

9 CHAIR STONE: Jay did.

10 MEMBER FELDMAN: I made the  
11 motion. I don't think I got a second.

12 CHAIR STONE: It wasn't seconded,  
13 so we're still sort of in limbo here.

14 MEMBER BONDERA: I second Jay's  
15 motion.

16 CHAIR STONE: So to couple this to  
17 each -- clarification, Jay, is that to couple  
18 this statement with each material?

19 MEMBER FELDMAN: You know, there  
20 were different ways it could be done. But if  
21 there were to be a motion, I think it would  
22 have to come prior to the vote, which might be

1 a little awkward, on each material.

2 MEMBER AUSTIN: Mac?

3 CHAIR STONE: Harold?

4 MEMBER AUSTIN: Since the voting  
5 has already started, and we've already got a  
6 couple of materials where I could move through  
7 it, I think this would be out of order.

8 CHAIR STONE: That's why I  
9 suggested this as a -- as its own item to be  
10 approved or not after we get the referrals  
11 done.

12 MEMBER FELDMAN: I don't see --

13 CHAIR STONE: Jay?

14 MEMBER FELDMAN: I'm not sure I  
15 understand this being out of order. A motion  
16 was on the table for specific material  
17 approval, and a motion was made to amend that  
18 motion by attaching this language. That  
19 requires a second, and then a majority vote.

20 So I'm not sure why that would be  
21 out of order.

22 CHAIR STONE: No. I wasn't saying

1 it was out of order. It's just --

2 MEMBER FELDMAN: Okay.

3 CHAIR STONE: -- it's complicated.

4 So there is a motion and a second to couple

5 this language with the referral. Motion?

6 Tracy?

7 MEMBER FAVRE: Just a point of  
8 clarity. Colehour did ask for it to be  
9 attached to each referral. And since one has  
10 already been done, I think that was Harold's  
11 point about being out of order. If we're  
12 doing it going forward, or -- I mean, we have  
13 already voted to send the first material back  
14 to committee, and that is already done and  
15 it's gone. So I don't know that we can go  
16 back now and reattach it. I mean, we probably  
17 should have done it back at that material.

18 MEMBER BONDERA: I agree. I  
19 agree. I apologize. I was trying to suggest  
20 simplification. I understand that we had  
21 voted on the one that Joe had done, the  
22 chlorine, but at this point in time, since it

1 was -- you know, Jean hadn't brought it up,  
2 and Jay hadn't made the motion, so it would  
3 apply to this one at this point in time. And  
4 if we want to do it for each one, I was just  
5 suggesting we could maybe simplify it. But if  
6 we need to do it more formally, I'm happy to  
7 be more formal.

8 CHAIR STONE: Jean?

9 MEMBER RICHARDSON: You know, this  
10 isn't really that bad, what's up here. I  
11 mean, I think if it said -- I would be in  
12 favor of this motion, just do it as a motion  
13 for all of the materials that go back to the  
14 subcommittee on aquaculture. It's a perfectly  
15 reasonable motion. Jay and I have tried to  
16 sort of build in what we think is -- reflects  
17 what we will actually be doing in the  
18 subcommittee.

19 So I don't think it's a big deal.  
20 I think I would just say that the motion --  
21 that all of the materials referred back to the  
22 Livestock Committee, and that way you just do

1 it once and just vote on it.

2 I understand that Zea isn't  
3 terribly keen on the idea that we wait for  
4 final. I mean, the reality of what will  
5 happen is it will go back to the subcommittee.  
6 And as soon as the proposal comes out, knowing  
7 our work plans, we will already be working on  
8 it, so that hopefully by the time the final  
9 rule in fact comes out that we will be able to  
10 mesh the new recommendations in line with the  
11 final as it is coming out. I mean, that's the  
12 reality of what's on there.

13 So I think this is a very  
14 reasonable motion that probably meets  
15 everybody's needs.

16 CHAIR STONE: Zea?

17 MEMBER SONNABEND: I respectfully  
18 disagree with that assessment. I think that  
19 waiting until the final rule comes out on the  
20 standards in order to propose the first  
21 material onto the list, say it doesn't come  
22 out for three years, and then you have the

1 rulemaking process on the materials which  
2 takes another two years. You're looking at  
3 five years.

4 If it was not quite so  
5 prescriptive, this mandates that it has to not  
6 be done until the final regulations come out,  
7 by just referring it back to the committee.  
8 That is, you know, absurdly restrict for  
9 something that just needs more exploration.

10 So if it just had .2, then I would  
11 vote in favor of it. But with .1 in there, I  
12 just think you are completely hamstringing the  
13 Board and the future boards into this absurd  
14 thing.

15 CHAIR STONE: Jean?

16 MEMBER RICHARDSON: So if we just  
17 change the phrase where it says the NOP  
18 publish proposed aquaculture, would that do it  
19 for you? Because obviously we can't actually  
20 look at the --

21 MEMBER SONNABEND: If it said that  
22 and it was "or" between one and two, that

1 would be okay. But if it says that, you know,  
2 I'm not that comfortable with just that. But  
3 if it said they published the proposed rule or  
4 you get a TR that makes you comfortable to  
5 vote for it --

6 MEMBER RICHARDSON: But the thing  
7 is, we really can't study the materials until  
8 such time as we've actually got some  
9 regulations or proposed ones to look at. So  
10 we won't even know the right questions perhaps  
11 for the TR.

12 So, in other words, what --

13 MEMBER SONNABEND: Well, if you're  
14 back to not even requesting a TR, because you  
15 don't have questions until there's rules out,  
16 then you're talking about like six or seven --

17 MEMBER RICHARDSON: Well, there  
18 are plenty of questions we can ask now, but  
19 they won't necessarily be all of them until we  
20 have a proposed rule.

21 CHAIR STONE: Tracy?

22 MEMBER FAVRE: I would consider it

1 as a friendly amendment if we put in there  
2 "publishes the draft rules." I would be more  
3 comfortable with that. I share Zea's concern  
4 about the prescriptive nature of this, as I  
5 said, but we do effectively need some sort of  
6 standards at least from which to work as we're  
7 doing the evaluation and incorporating the  
8 comments that we received yesterday from the  
9 Board.

10 So I would, at least for  
11 tocopherols, which is mine that made the  
12 motion, I would consider that as a friendly  
13 amendment, if we revised it so that Point I  
14 was the NOP publishes  
15 draft aquaculture regulations. Sorry,  
16 proposed.

17 CHAIR STONE: Does the maker of  
18 the motion accept that friendly amendment?

19 MEMBER FELDMAN: I mean, I'd like  
20 to hear other conversation on that. You know,  
21 the problem is, that was a big part of the  
22 public comment, that -- how do we determine

1 acceptable materials and their use patterns  
2 outside the context of a regulation.

3 As you all know, you guys have  
4 been involved with the regulatory process, and  
5 with as intelligent a group of stakeholders in  
6 the audience, you know, we could -- I'm just  
7 putting this on the table for question. You  
8 know, we could see the final rule change, you  
9 know, in some important ways from the draft  
10 rule.

11 That's -- that would just mean we  
12 -- I would suspect the Board would have to  
13 come back and then do additional work if the  
14 final rule were to be substantially different.  
15 And so just think about that when you amend  
16 this language. But I'm open to it. I just  
17 wanted to have a little discussion on that, so  
18 people are aware of that problem.

19 CHAIR STONE: And I would suggest  
20 that -- trust future boards to determine when  
21 the right time to listen to public comment off  
22 the proposed rule. But to Zea's point, the

1 materials can be coupled with the final rule  
2 as they go -- to be ready to be coupled to go  
3 through the rulemaking process.

4 So we are desperately tight on  
5 time here. Nick, quickly.

6 MEMBER MARAVELL: Yes. I support  
7 the friendly amendment, and I understand the  
8 -- and have been in, as most of us have been,  
9 in this situation of materials and rules. But  
10 we have managed to work through it over the  
11 past 20-odd years. So I support the friendly  
12 amendment.

13 CHAIR STONE: Jay?

14 MEMBER FELDMAN: Okay. I support  
15 it.

16 CHAIR STONE: Thank you, Jay.

17 Colehour?

18 MEMBER BONDERA: I'll accept the  
19 change of "final" to "proposed."

20 CHAIR STONE: So Michelle will  
21 change the word "final" to "proposed." And  
22 we'll trust that future boards will act

1 appropriately based on how that transpires.

2 So now we're going to couple this  
3 with each of the materials. In effect, that  
4 will -- chlorine will be -- was not coupled  
5 with this, is caught in the same bundle, so I  
6 think it was not necessary to go backwards in  
7 the agenda.

8 So we have a motion on the floor  
9 to accept this attachment to the referral  
10 documents, and the voting starts with Francis.

11 MEMBER THICKE: Yes.

12 MEMBER BONDERA: Yes.

13 MEMBER TAYLOR: Yes.

14 MEMBER FELDMAN: Yes.

15 MEMBER SONNABEND: Abstain.

16 MEMBER AUSTIN: No.

17 VICE CHAIR FOSTER: Yes.

18 SECRETARY WALKER: Yes.

19 MEMBER RICHARDSON: Yes.

20 MEMBER DICKSON: Yes.

21 MEMBER BECK: No.

22 MEMBER FAVRE: Yes.

1 MEMBER MARAVELL: Yes.

2 MEMBER FULWIDER: Yes.

3 CHAIR STONE: The Chair votes yes.

4 So this will be coupled with each of the  
5 materials, so as to expedite the voting on the  
6 rest of the aquaculture materials -- be quite  
7 clear.

8 Now there is a motion on the floor  
9 to refer tocopherols back to committee. Any  
10 questions? Any clarification?

11 (No response.)

12 All in favor say aye.

13 (Chorus of ayes.)

14 Any opposed?

15 (No response.)

16 Hearing no opposed, motion  
17 carries.

18 MEMBER FAVRE: Okay. The next  
19 material is petition for minerals in aquatic  
20 animal production. Francis, that's you.

21 MEMBER THICKE: I move that we  
22 refer the proposal for minerals for aquatic

1 animals back to the committee, as per the  
2 language on the screen, except the word  
3 "final" being replaced with "proposed."

4 MEMBER FAVRE: Second.

5 CHAIR STONE: That's a given.

6 Motion and a second. Any further discussion?

7 (No response.)

8 All in favor say aye.

9 (Chorus of ayes.)

10 Any opposed?

11 (No response.)

12 Hearing no opposed, motion  
13 carries.

14 Next?

15 MEMBER FAVRE: Next material was a  
16 petition for vitamins in aquatic animal  
17 production. Calvin?

18 SECRETARY WALKER: Yes. I move  
19 that we refer vitamins for aquaculture animals  
20 back to the committee, with the proposed  
21 motion change.

22 MEMBER FAVRE: Second.

1 CHAIR STONE: I have a motion and  
2 a second. Any further discussion?

3 (No response.)

4 All in favor say aye.

5 (Chorus of ayes.)

6 Any opposed?

7 (No response.)

8 Hearing no opposed, motion  
9 carries.

10 Thank you.

11 MEMBER FAVRE: Next material is  
12 biologics/vaccines in aquatic animal  
13 production. Jean?

14 MEMBER RICHARDSON: I make a  
15 motion that we refer the vaccine/biologics for  
16 aquatic animals back to the subcommittee.

17 MEMBER FAVRE: Second.

18 CHAIR STONE: Motion by Jean.  
19 Second by Tracy. Any further discussion?

20 (No response.)

21 All in favor say aye.

22 (Chorus of ayes.)

1 Any opposed?

2 (No response.)

3 Hearing no opposed, motion  
4 carries.

5 Next?

6 MEMBER FAVRE: Next, material for  
7 petition was micronutrients for use in aquatic  
8 plant production. Francis?

9 MEMBER THICKE: I move that we  
10 refer the proposal for micronutrients for  
11 aquatic plants back to the Livestock  
12 Subcommittee with the attached language.

13 MEMBER FAVRE: Second.

14 CHAIR STONE: Motion, Francis;  
15 second, Tracy. Any further discussion?

16 (No response.)

17 All in favor say aye.

18 (Chorus of ayes.)

19 Any opposed?

20 (No response.)

21 Hearing no opposed, motion  
22 carries.

1 Thank you.

2 MEMBER FAVRE: Next material is  
3 carbon dioxide for use in aquatic plant  
4 production. I'd like to make a motion that  
5 this be referred back to subcommittee with the  
6 attached language.

7 MEMBER THICKE: Second.

8 CHAIR STONE: Motion, Tracy;  
9 second, Francis. Any further discussion?

10 (No response.)

11 All in favor say aye.

12 (Chorus of ayes.)

13 Any opposed?

14 (No response.)

15 Hearing no opposed, motion  
16 carries.

17 MEMBER FAVRE: Next material is  
18 chlorine materials for use in aquatic plant  
19 production. Joe?

20 MEMBER DICKSON: I move that the  
21 proposal on aquatic -- or on chlorine in  
22 aquatic plant production be referred back to

1 the subcommittee with the language on the  
2 screen.

3 MEMBER FAVRE: Second.

4 CHAIR STONE: Motion, Joe; second,  
5 Tracy. Any further discussion?

6 (No response.)

7 All in favor say aye.

8 (Chorus of ayes.)

9 Any opposed?

10 (No response.)

11 Hearing no opposed, motion  
12 carries.

13 MEMBER FAVRE: Next material is  
14 lignin sulfonate in aquatic plant production.  
15 Jean?

16 MEMBER RICHARDSON: I make the  
17 motion that we refer lignin sulfonate for  
18 aquatic plants back to the subcommittee.

19 MEMBER FAVRE: Second.

20 CHAIR STONE: Motion, Jean;  
21 second, Tracy. Any further discussion?

22 (No response.)

1 All in favor say aye.

2 (Chorus of ayes.)

3 Any opposed?

4 (No response.)

5 Hearing no opposed, motion  
6 carries.

7 MEMBER FAVRE: And our final  
8 material -- a round of applause, please -- for  
9 vitamins in aquatic plant production. Calvin?

10 SECRETARY WALKER: I make a motion  
11 that vitamins for plants to be returned back  
12 to the committee with the language change  
13 proposed.

14 MEMBER FAVRE: Second.

15 CHAIR STONE: I have a motion for  
16 aquatic plants. Second, Tracy. Any further  
17 discussion?

18 (No response.)

19 All in favor say aye.

20 (Chorus of ayes.)

21 Any opposed?

22 (No response.)

1                   Hearing no opposed, motion  
2 carries.

3                   Thank you very much.

4                   MEMBER FAVRE: Mr. Chair, thank  
5 you. That concludes the votes for Livestock.

6                   CHAIR STONE: And I thank the  
7 Livestock Committee, and Tracy specifically,  
8 and others that worked very diligently in  
9 developing those proposals and getting us to  
10 this point in the process on those materials.

11                   Thank you, all.

12                   Okay. In the essence of time, we  
13 are not going to take a break.

14                   MEMBER BONDERA: Can we have a  
15 five- minute break?

16                   CHAIR STONE: Five? Okay. Five  
17 minutes. Be back in five minutes.

18                   Thank you.

19 (Whereupon, the proceedings in the foregoing  
20 matter went off the record at 11:06 a.m. and  
21 went back on the record at 11:12 a.m.)

22                   CHAIR STONE: Okay. I'm going to

1 turn the -- turn to Harold as the Chair of the  
2 Handling Subcommittee to put the first  
3 material on the table.

4 MEMBER AUSTIN: Thank you, Mac.  
5 Our first material for addition to 205605,  
6 ammonium hydroxide as a boiler water additive.  
7 Jean was the lead. Jean, would you make the  
8 proposal?

9 MEMBER RICHARDSON: Yes. I make  
10 the motion that we refer the ammonium  
11 hydroxide boiler water additive as petitioned  
12 back to the Handling Subcommittee.

13 MEMBER AUSTIN: I'll second that.

14 CHAIR STONE: I have a motion by  
15 Jean, a second by Harold, to refer this  
16 material back to committee -- subcommittee.  
17 Any further discussion?

18 (No response.)

19 All in favor say aye.

20 (Chorus of ayes.)

21 Any opposed?

22 (No response.)

1                   Hearing no opposed, motion  
2 carries.

3                   Harold?

4                   MEMBER AUSTIN: All right. Our  
5 second material is a material to be removed  
6 from 205605B, glycerin, Case Number 56-81-5.  
7 Tracy was the lead on that.

8                   MEMBER FAVRE: I make the motion  
9 that this material is referred back to  
10 subcommittee.

11                   MEMBER AUSTIN: I'll second.

12                   CHAIR STONE: I have a motion,  
13 Tracy; second, Harold, refer this back to  
14 committee. Any further discussion?

15                   (No response.)

16                   All in favor say aye.

17                   (Chorus of ayes.)

18                   Any opposed?

19                   (No response.)

20                   Hearing none, motion carries.

21                   Thank you.

22                   MEMBER AUSTIN: We've got one

1 final -- third material, polyalkaline glycol  
2 monobutyl ether. That was a discussion  
3 document, and that will default back to the  
4 subcommittee for further deliberation. And we  
5 will bring that back to the full Board in the  
6 fall. And that wraps up our presentation.

7 CHAIR STONE: Okay. Thank you,  
8 Harold.

9 And just for the record, we are  
10 one minute ahead of schedule.

11 Thank you all very much. That was  
12 -- it's always difficult to work through this,  
13 and thank you all. Difficult in many ways, I  
14 should say.

15 So next on the agenda is officer  
16 elections. So just in general the process is  
17 we will take nominations from the Board for --  
18 to be Chair. Once that vote is complete, then  
19 there will be nominations for Vice -- Vice  
20 Chair. And then once voting is complete,  
21 there will be nominations for Secretary, and  
22 they will each be voted on separately.

1                   So which color, Calvin, is going  
2                   to be Chair?

3                   SECRETARY WALKER: Pink for Chair.

4                   CHAIR STONE: Pink for Chair. How  
5                   about that. Okay. Very good.

6                   So I will entertain a motion,  
7                   nominations for -- to be Chair. Joe?

8                   MEMBER DICKSON: I'd like to  
9                   nominate Dr. Jean Richardson as Chair.

10                  SECRETARY WALKER: Second.

11                  CHAIR STONE: I have a motion -- I  
12                  mean, a nomination -- I don't guess it's  
13                  motions. Yes, it is. It's a motion. And a  
14                  second for Jean to -- Jean Richardson to be  
15                  the Chair of the National Organic Standards  
16                  Board.

17                  Are there other nominations from  
18                  the Board?

19                  (No response.)

20                  Seeing no other nominations,  
21                  hearing no other nominations from the Board,  
22                  I guess we declare Jean by acclamation to be

1 the next Chair of the National Organic  
2 Standards Board.

3 (Applause.)

4 Is that really a smile, or just  
5 kind of a fake smile?

6 (Laughter.)

7 I'm going with the fake smile  
8 myself. And I might understand that myself,  
9 actually, after this morning.

10 So next I'll accept nominations  
11 from Board members for Vice Chair. And Jean  
12 does need some help. Somebody?

13 SECRETARY WALKER: I nominate  
14 Wendy Fulwider.

15 CHAIR STONE: I have a nomination  
16 for Wendy. I guess I should ask, do you  
17 accept the nomination?

18 MEMBER FULWIDER: I'm going to  
19 decline.

20 CHAIR STONE: Okay. Okay. So we  
21 have a do-over. Jean?

22 MEMBER RICHARDSON: I would like

1 to nominate John Foster.

2 SECRETARY WALKER: Second.

3 CHAIR STONE: I have a nomination  
4 and a second for John to continue as Vice  
5 Chair. Is there any other nominations from  
6 the Board?

7 VICE CHAIR FOSTER: I'll nominate  
8 Colehour.

9 CHAIR STONE: I have a nomination  
10 of Colehour. Do you accept that nomination?

11 MEMBER BONDERA: Yes.

12 CHAIR STONE: Jennifer, you had  
13 your hand up a second ago?

14 MEMBER TAYLOR: I was going to  
15 have the same --

16 CHAIR STONE: Okay. I have a  
17 nomination for Colehour for Vice Chair. Any  
18 other nominations from the Board? I'm sorry.  
19 John, do you accept the nomination?

20 VICE CHAIR FOSTER: I do.

21 CHAIR STONE: Okay. Thanks.

22 Okay. So, at this time, if each

1 one would mark the green sheet, Calvin, is  
2 that right, for Vice Chair?

3 SECRETARY WALKER: Yellow.

4 CHAIR STONE: Yellow? Use your  
5 yellow notecards. And Calvin, as Secretary,  
6 will read the votes, and I will ask Jean, as  
7 incoming, to have the second set of eyes to  
8 look at the votes, please.

9 (Pause.)

10 So, Secretary C. Reuben has -- and  
11 verified by Dr. Richardson, John, nine votes;  
12 Colehour, six. John, stay on as Vice Chair.  
13 Thank you very much.

14 VICE CHAIR FOSTER: You're  
15 welcome.

16 (Applause.)

17 CHAIR STONE: So now for Secretary  
18 I'll accept nominations from Board members.

19 SECRETARY WALKER: I would like to  
20 nominate Mac Stone Secretary.

21 MEMBER MARAVELL: I second the  
22 nomination.

1 CHAIR STONE: Yesterday I was  
2 thinking one thing. After this morning, I'm  
3 thinking something -- no, I would accept.

4 MEMBER MARAVELL: Well, we're not  
5 nominating you for Chair.

6 CHAIR STONE: I understand that.  
7 No, I will accept that. Other nominations  
8 from the Board, please? Please?

9 (Laughter.)

10 MEMBER FAVRE: Do we need to call  
11 A and B, first?

12 CHAIR STONE: No. But I'm hoping  
13 I miss my flight. No other nominations?

14 (No response.)

15 Okay. A little awkward accepting  
16 that myself as the Chair, but -- yes, John, if  
17 you would do that.

18 VICE CHAIR FOSTER: Hearing no  
19 other nominations, we will -- hearing no other  
20 nominations, we'll by acclamation declare Mac  
21 Stone as the Secretary for the next season.

22 (Applause.)

1 CHAIR STONE: Thank you very much.

2 I guess we didn't clarify before  
3 the vote, we are out of synch because of the  
4 cancelled fall meeting last fall. So this  
5 sitting officership will be for six months.  
6 And at the fall meeting we will vote again for  
7 each of these officers to get back online to  
8 be consistent with our PPM that they are voted  
9 on at the fall meeting. So this is an  
10 abbreviated officership, however you phrase  
11 that. Okay?

12 Thank you very much.

13 So I think the way we have kind of  
14 scripted this is I'm going to hand the floor,  
15 the Chair, to the new Chair, Jean. The work  
16 plans will be discussed, and she will be  
17 chairing this term. And then, when she is  
18 done, there will be a few closing remarks by  
19 myself and/or Miles to close out the meeting.

20 So, Jean, and I guess we've got  
21 work plans coming up.

22 MEMBER RICHARDSON: The next item

1 on the agenda, then, are the work plans. And  
2 we see them on the overhead next to us. I'm  
3 not sure exactly how we do this. Do we go  
4 through each subcommittee and have the Chair  
5 of each subcommittee comment on them?

6 CHAIR STONE: Yes, ma'am.

7 MEMBER RICHARDSON: Okay. Start  
8 with CACS. Carmela, please?

9 MEMBER BECK: All right. Well, so  
10 it looks like we've got two agenda items. The  
11 205206E, that's the one that we're going to  
12 take back to subcommittee to see how to  
13 proceed on it for the fall meeting, if indeed  
14 we choose to move forward with that, and then  
15 the second item is, as it says, the assessment  
16 of soil conservation practices, that we plan  
17 to have a discussion document for the fall  
18 meeting. So those are our two for the fall.

19 Thank you.

20 MEMBER RICHARDSON: Thank you.

21 For the Crops Subcommittee, Zea,  
22 please.

1                   MEMBER SONNABEND: Okay. So now  
2                   is when I'll ask inspiration to move me  
3                   brightly towards our next semester of work for  
4                   the NOSB when we will be considering our first  
5                   sunset materials. Those sunsets are sulfurous  
6                   acid, sodium carbonate peroxyhydrate, and two  
7                   listings for aqueous potassium silicate.

8                   We have 2016 sunset materials that  
9                   we will be doing our first summary for. Those  
10                  include ferric phosphate -- hard to believe  
11                  that's up again already -- and hydrogen  
12                  chloride for cotton seed delinting.

13                  And then -- okay. I don't --  
14                  what? No, I don't want to see 2017. But just  
15                  so the public knows, we are well underway on  
16                  taking a look at 2017 materials to try and  
17                  commission TRs for the ones that seem to need  
18                  it. And we will, over the summer, be deciding  
19                  on those TRs and identifying questions to send  
20                  along for the TR reviews.

21                  Then, we have petition materials.  
22                  Those include carbon monoxide, which we have

1 renamed as exhaust gas, because it is not pure  
2 carbon monoxide, and a TR is out for that  
3 right now. So we hope to have a proposal for  
4 fall.

5 Allyl isothiocyanate will also be  
6 -- that's in the TR stage. It's a petitioned  
7 item and will be hopefully a proposal for  
8 fall.

9 We do hope to have progress on  
10 inerts, and we will report on that as we can.

11 The thing right below that,  
12 propylene carbonate, is a petition for an  
13 inert, which is pretty much on hold in the  
14 meantime.

15 And, last but not least, the issue  
16 that we put on the work plan -- well, right  
17 before the last fall meeting, which is to  
18 examine contamination issues in farm inputs,  
19 that will be on -- we hope as a discussion  
20 document in the fall of 2014.

21 And that will be the Crops  
22 Committee -- Subcommittee's work plan.

1 Thank you.

2 MEMBER RICHARDSON: Thank you,  
3 Zea.

4 Harold for Handling, please.

5 MEMBER AUSTIN: All right. For  
6 the Handling for this next term, you know,  
7 we've got a pretty light workload, so I think  
8 we'll be able to take it easy, sit back along  
9 the beach somewhere.

10 No, we've actually got quite an  
11 extensive workload. Petition materials, we've  
12 got gibberellic acid, which now would -- since  
13 we have the first harvest handling guidance,  
14 we'll be able to move that along and make a  
15 determination on that. Whole algal flour, a  
16 petition that it be added to 205606.

17 Ammonium hydroxide, which just was  
18 deferred back to the committee, glycine, and  
19 then PGME was the discussion document. All of  
20 those are coming back to the subcommittee for  
21 further work. Triethyl citrate, that one  
22 should be moving forward for the fall meeting

1 as well.

2 That will move us on into our 2015  
3 sunset materials, which we heard the first  
4 public commentary on. First posting took  
5 place at this meeting. The final review,  
6 final posting on those, and discussion will be  
7 coming up for discussion in the fall meeting.

8 And we'll move into our 2016  
9 materials. Egg white lysozyme microorganisms,  
10 activated charcoal, peracetic acid, we'll run  
11 into our three boiler materials, which I'm not  
12 going to try to pronounce all of three of  
13 those right now. L-Malic acid, sodium acid,  
14 pyrophosphate, and then tetrosodium  
15 pyrophosphate, TSPP.

16 And then, just for good measure,  
17 we will have -- we will move into our 2017  
18 sunset materials. We have just simply got 103  
19 of those. We won't go into them individually,  
20 but I think I would, just for the sake of  
21 getting it into the record, so everybody is  
22 aware, we are going to look at those as

1 classification groups.

2           And those groups will be looking  
3 -- that will be looking at will -- as we do  
4 the review for TR need, will be filtering  
5 agents, food coatings, food acids, minerals,  
6 sanitizers, gums and thickening agents,  
7 vitamins and minerals, leavening agents,  
8 drying, preservatives, gases, colors, casings,  
9 miscellaneous ingredients, dairy products, and  
10 flavors.

11           So, I mean, that's just breaking  
12 them up into the subclasses. I mean, and each  
13 one of those, like I said, we've got 103 of  
14 those.

15           Then, other projects, we will be  
16 continuing to work and come back with an  
17 update on progression on ancillary substances,  
18 and then we have one other material -- is it  
19 on here? It's not on there. We've got one  
20 that we are working on, and I don't know --  
21 we'll have it back on our work plan -- BPA.  
22 So at this moment it's just -- we've got it

1       tabled, and we may or may not bring it back  
2       forward.

3                       Madam Chair, that's all I have.

4                       MEMBER RICHARDSON: Thank you,  
5       Harold.

6                       John, you have a comment?

7                       VICE CHAIR FOSTER: Just one thing  
8       to say. As former Chair of the Handling  
9       Committee, good luck to you. And I can tell  
10      you with no uncertainty you are entering a  
11      world of pain.

12                      (Laughter.)

13                      MEMBER AUSTIN: Golly, gee,  
14      thanks.

15                      MEMBER RICHARDSON: The next  
16      subcommittee is Livestock. Tracy, please?

17                      MEMBER FAVRE: Thank you, Jean.  
18      We will be doing petition materials as they  
19      come up, including aluminum sulfate.  
20      Obviously, our work plan is going to look  
21      substantially different than planned, since we  
22      have so many proposals referred back to

1 committee.

2 But other projects, we've got  
3 vaccines from excluded methods, the update on  
4 that. We have 43 2017 sunset materials. And  
5 then, in addition to the aquaculture  
6 proposals, we also have the methionine, the  
7 acidified sodium chlorite.

8 MEMBER RICHARDSON: Mac, you have  
9 a question?

10 CHAIR STONE: Yes. Just a  
11 comment, really. Just with the sunset bubble  
12 on the way, just figure out how the committee  
13 and the timing of -- I'm worried about  
14 aquaculture materials getting stale. Maybe we  
15 -- we heard a lot of great comment from other  
16 Board members about specific issues, and just  
17 trying to think about how best to address some  
18 of that while it's fresh in our mind versus  
19 waiting for a proposed rule. And so it's just  
20 a comment for the committee members to think  
21 -- start thinking about processing the timing  
22 of how to deal with all of that.

1                   So you've got a lot on your plate,  
2                   and I just want to offer some help in that  
3                   way, so --

4                   MEMBER RICHARDSON: Thank you. It  
5                   will be appreciated.

6                   Thank you, Tracy.

7                   The next subcommittee, Materials,  
8                   GMO, ad hoc. Calvin, please?

9                   SECRETARY WALKER: Thank you,  
10                  Madam Chair, Chairman, Chairperson. The work  
11                  plan items for the Materials GMO Ad Hoc  
12                  Committee, as you can see on the screen, is  
13                  research priorities will be coming up in the  
14                  fall, petitions and TR tracking, which will be  
15                  an ongoing thing that will probably not be  
16                  brought back up in the fall.

17                  Technical difficulty.

18                  Seed purity, the next step, report  
19                  that we heard at this meeting here is that  
20                  over 80 percent of the stakeholders wanted --  
21                  provided input. And we still have some work  
22                  to do on seed purity based upon our

1 stakeholders' requests.

2 And other projects, prevention  
3 strategies, for excluded methods and crops and  
4 handling, also planned for the fall.

5 That's it.

6 MEMBER RICHARDSON: Thank you,  
7 Calvin.

8 Those are all the work plans,  
9 right? So I turn it back to you, Mac.

10 CHAIR STONE: Thank you, Jean.  
11 Just one other thought. We heard some public  
12 testimony, concern about work plan  
13 development. There has been a lot of  
14 conversation as we've discussed this at the  
15 subcommittee level and Executive Committee  
16 level, Jay, that there is a process.

17 The committee members can bring  
18 forth a White Paper, for lack of a better  
19 term, to make the case for a work plan item.  
20 It gets vetted by the subcommittee. It  
21 bubbles up to the Executive Committee and can  
22 be strengthened along the way, if you will.

1 It gets submitted to the program.

2 They evaluate it about, is it  
3 something that's in our wheelhouse? Is it  
4 something that they can control? Is it -- so  
5 they evaluate it for how it fits in with the  
6 rest of the authority that the program and the  
7 Board has and discusses it with the Executive  
8 Committee and/or the subcommittee.

9 So there still is a process. It  
10 is more formal. And from my perspective, it's  
11 still a very viable and open process for the  
12 Board members to listen to the broader  
13 community and work with the process that we  
14 have to get work plan items brought forth to  
15 the full Board.

16 Any other thoughts/comments there,  
17 while we have a minute?

18 (No response.)

19 Okay. So that concludes our  
20 official business. I had a couple of  
21 thoughts, just -- is there any Other Business  
22 to come before the Board? Colehour?

1 MEMBER BONDERA: Thank you, Mac.

2 Yes, I think that this is Other Business, and  
3 I'm glad that we are not super far behind  
4 schedule, according to my review, so it will  
5 take a few moments, but it won't take that  
6 long.

7 I just wanted to tell everybody as  
8 a proud small-scale farmer, which I am, and I  
9 think in jest, but truthfully I'm a confirmed  
10 NOSB minority in many ways, but for the sake  
11 of, you know, just -- I want to just say this  
12 for the sake of transparency. I want to let  
13 other NOSB members know that I'm going to be  
14 submitting this to Miles McEvoy, so I just  
15 want to read it. It's pretty brief.

16 "Dear National Organic Program:

17 As a member of the National Organic Standards  
18 Board, in order to maintain the integrity of  
19 the organic label, I hereby urge you to  
20 enforce the sunset provision of the Organic  
21 Foods Production Act as intended by requiring  
22 public debate and discussion and a vote of the

1 National Organic Standards Board on whether to  
2 relist allowed synthetic materials in organic  
3 production and processing on a five-year  
4 cycle.

5 "Organic has always been held to  
6 high standards of public review, and the  
7 relisting process, like the initial petition  
8 process, ensures important scientific and  
9 essentiality scrutiny to maintain public trust  
10 in the organic label. Sincerely, Colehour  
11 Bondera."

12 And I do invite and welcome other  
13 minority and majority NOSB members to add  
14 their names to this Other Business, and I  
15 honestly also think that this should be at  
16 least commented on or discussed at the  
17 Executive Subcommittee level. So that's what  
18 I wanted to put forth, and I appreciate your  
19 time to hear me.

20 Thank you.

21 CHAIR STONE: Okay. Jay?

22 MEMBER FELDMAN: Mr. Chairman,

1 thank you for all of your hard work and  
2 diligence as Chair, and especially in running  
3 the meetings. I know that's a very stressful  
4 job.

5 I just wanted to let the Board  
6 members know that I will be signing on to  
7 Colehour's letter, and hope that we can  
8 continue this discussion in an open manner, so  
9 that the community feels that we are  
10 responsive to these issues.

11 Thank you.

12 CHAIR STONE: Thank you, Jay.

13 Any other last thoughts of Board  
14 members?

15 MR. McEVOY: If I may say  
16 something. Yes. Thank you for those  
17 comments, and look forward to further  
18 discussions at the Executive Committee.

19 CHAIR STONE: So I just had a  
20 couple of thoughts that I'd like to leave out  
21 there. As Chair, I think I stated it earlier  
22 today, that all Board chairs are rookies, and

1 it's really easy for rookies to not be sure  
2 how to navigate various aspects. But it has  
3 been very, very rewarding to me to have the  
4 pleasure and to work with such dedicated,  
5 hardworking folks.

6 And for my term on the Board, not  
7 just as Chair, no matter how much we give,  
8 Jay, no matter how much energy we put into  
9 this stuff, I personally have gained more than  
10 I ever feel like I could give, because of what  
11 we go through to make the deliberations.

12 So to the audience, I'd like to --  
13 apparently, I didn't say it as well as I  
14 thought I did yesterday. The sunset procedure  
15 has changed. The Board cannot do anything  
16 about that. That's not what we do. That's  
17 not true; there is something we can do about  
18 that.

19 We have the responsibility to make  
20 it the best it can be on behalf of the  
21 stakeholders that have materials or standards  
22 changes to go through. So whatever happens in

1 the broader context outside of this room,  
2 outside of the Board action, we can't do  
3 anything about that. I hear rumors about  
4 things that may happen because of people not  
5 liking the action of the USDA, but I think you  
6 saw here that this Board still has a  
7 responsibility to work with the rules that we  
8 have and to do the best that we can.

9 And we need your all's support,  
10 your all's help, whatever that -- whatever  
11 perspective you bring to the table, we need  
12 your help to get the work done, and the other  
13 thing is just out there. But while that's --  
14 whatever happens out there doesn't affect --  
15 we need your help to get our work done at this  
16 table.

17 The last thing I'd like to say is,  
18 so when we come into this room and very  
19 passionate, very caring, very understanding  
20 people throw barbs at the process, at this --  
21 all of this inside this room, and that's  
22 great. That's what democracy is all about.

1 But I will suggest that those barbs hit  
2 people, these 15, 16, 17, 18 people. And it  
3 can be hurtful because we are trying to do the  
4 best we can.

5 So, again, we need your help. But  
6 what I'm concerned about is is when people  
7 leave this room, when you get the cab back to  
8 the airport, and the cab driver says, "Oh,  
9 what have you been doing in San Antonio?" that  
10 when you get out of that cab, the cab driver  
11 has a better appreciation and respect for  
12 organic food for what it is rather than a  
13 perception that the system is flawed or the  
14 people don't care or whatever it might be.

15 And I just want to make sure that  
16 all of us, when we leave this room, differing  
17 opinions about what votes we made, that we  
18 promote that seal right there to anybody and  
19 everybody we can. When we come into this  
20 room, we fight tooth and nail for our  
21 conviction. But when we leave, it's all about  
22 promotion of that seal.

1 Thank you very much.

2 (Applause.)

3 MEMBER SONNABEND: I think we  
4 should give Mac a big round of applause for  
5 being our Chair and going out with a bang.

6 CHAIR STONE: Thank you.

7 (Applause.)

8 Miles? So, Miles, I'll turn it  
9 over to you to close it out.

10 MR. McEVOY: All righty. So an  
11 interesting meeting, as all meetings are.  
12 Lots of fun this week. Thank you all for the  
13 public comments. The Board received a lot of  
14 great information and perspectives about their  
15 proposals. We really appreciate all the time  
16 and effort that everyone put into providing  
17 comments.

18 The Agricultural Marketing Service  
19 also heard many concerns about the revised  
20 sunset process. As you heard from me, that we  
21 are convinced that the revised sunset process  
22 increases transparency and public input into

1 the process. The revised process more closely  
2 aligns with the Organic Foods Production Act  
3 by ensuring that the NOSB fulfills its  
4 responsibility to fully review all substances  
5 on the national list every five years.

6 In addition, it assures that all  
7 recommended changes to the USDA organic  
8 regulations are supported by at least  
9 two-thirds of the Board members.

10 Thanks to the Board for their work  
11 on implementing the revised process. USDA  
12 thanks the Board members for their service.  
13 Your expertise and advice will help USDA  
14 improve the National Organic Program. We  
15 invite everyone to come see us next October in  
16 Louisville, Kentucky.

17 And with that, the spring 2014  
18 NOSB meeting is closed.

19 Thank you.

20 (Whereupon, at 11:43 a.m., the proceedings in  
21 the foregoing matter were concluded.)

22

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In the matter of: National Organic Standards Board

Before: Department of Agriculture

Date: 05-02-2014

Place: San Antonio, Texas

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