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UNITED STATES DEPARTMENT OF AGRICULTURE
NATIONAL ORGANIC PROGRAM
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
FALL 2024 MEETING
PUBLIC COMMENT WEBINAR

Tuesday
October 15, 2024
11:30 a.m. EST
Day 1

1 National Organic Standards Board (NOSB) Members

2 Kyla Smith, NOSB Chair

3 Amy Bruch, NOSB Vice Chair

4 Nate Lewis, NOSB Secretary

5 Brian Caldwell

6 Jerry D'Amore

7 Carolyn Dimitri

8 Kim Huseman

9 Mindee Jeffery

10 Allison Johnson

11 Dilip Nandwani

12 Logan Petrey

13 Nate Powell-Palm

14 Franklin Quarcoo

15 Wood Turner

16 Javier Zamora (absent)

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1 USDA/National Organic Program Staff
2 Erin Healy, Division Director of Standards (Webex)
3 Jared Clark, Assistant Standards Director
4 Andrea Holm, Agricultural Marketing Specialist,
5 Standards
6 Heather Kumar, NOSB Technical Support Staff
7 Michelle Arsenault, Advisory Committee Specialist,
8 Standards Division

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P R O C E E D I N G S

(Time 11:30 p.m.)

MS. ARSENAULT: Mute yourself, because I need to fuss around with some settings here.

(Pause.)

MS. ARSENAULT: Good thing I joined when I did, and that you prompted me to. Because somebody else just joined, and would not have been put in the waiting room like they should have.

(Pause.)

MS. ARSENAULT: Welcome, folks. We're going to get started in a minute or two. I just let everyone in from the waiting room. So as people start to join -- I just hit list as numbers increase. I have 63 on the call with us at the moment. We'll give it another minute here.

Has someone seen Wood yet? I think all other board members -- okay, Wood. I see you. Wood, I'm making you cohost, so you'll be able to raise your hand and mute and unmute your own mic.

All right. Welcome, everybody. I have about 67 people in the meeting with us. I think that the number's been jumping up a little bit. We'll get started shortly.

All right. Welcome, everybody. I see 72 people on the line with us. That's usually where we hover, maybe a little bit more on the first day. So I think the majority

1 of us are on the line. I think we'll get started with some
2 housekeeping tips here. First of all, I would like to call
3 the meeting to order. So I hereby call the National Organic
4 Standards Board meeting to order. And note that I'm going
5 to start recording. So if you do not wish to be recorded,
6 this is your opportunity to drop off your Zoom. All right.
7 You guys should all have seen a little pop-up on your screen
8 saying that the meeting's being recorded now.

9 Thank you for joining. It's so good to see
10 everybody's faces. This is my favorite time of year, the
11 NOSB meeting. We have two comment Webinars scheduled this
12 week. And we'll continue next week at the in-person portion
13 of the meeting in Portland, Oregon. Hopefully, you'll be
14 able to join us either virtually or in person.

15 If you're online, you should see an instruction
16 slide on the screen. And if you're on the phone only, I'm
17 going to summarize it for you. So don't worry about not
18 being able to see it at the moment.

19 Attendees, you will be on mute and unable to mute
20 yourself. The chat, though, is enabled. It's in the center
21 of your Zoom taskbar, which may be in different places for
22 different people. Mine's at the bottom of my screen. And I
23 have to hover over it. So you can chat with each other
24 through the chat button or if there's technical difficulties
25 to NOP, saying, "The sound is off," or something like that.

1 But chats are not part of the public record and are not a
2 public comment. So please don't use the chat button for
3 that.

4 Closed captioning is available in Zoom by
5 clicking the "More" button, which is on the right side of
6 your Zoom taskbar. You can control your own view and font
7 size in closed captioning or toggle it on and off. You
8 don't have to see the closed captioning, if you don't want
9 to.

10 Please don't use the raised hand feature. All
11 comments are registered ahead of time and will be called on
12 in turn by the board chair, Kyla. You can customize your
13 own view in Zoom. If you go to the upper right-hand corner
14 in the "View" button, you can toggle between gallery view
15 and speaker view. You can also click "Exit Full Screen"
16 when we share our slideshow, so it doesn't take over your
17 entire monitor. No worries changing your personal view.
18 Your own screen will not affect anyone else's in the
19 meeting.

20 We will spotlight the speaker timer for
21 everyone. So that should remain on your screen, no matter
22 what view you're using personally. If you are having
23 technical issues, you can text or e-mail, support.zoom.us,
24 and they're usually pretty responsive and can get your
25 problems sorted out. Or you can drop out of the meeting and

1 join it again. And usually, that solves your problem.

2 We will have a transcript after the meeting is
3 concluded -- after the Portland meeting. And this will be
4 posted on the NOP website as soon as it's available.

5 All right. Next slide. Speakers. So please
6 make sure that the name displayed in your video file is
7 correct so we can locate you when it's your turn to speak.
8 You should be able to rename yourself, if you click the
9 participant list in the Zoom taskbar. And next to your
10 name, you'll see a "More" button. You can rename yourself
11 there. Do keep an eye on the chat box. If you're scheduled
12 to speak and you can't find your name, you may throw out a
13 little chat -- note in the chat box to confirm that you're
14 online with us.

15 Two of my colleagues are assisting behind the
16 scenes and will be projecting and advancing the slides,
17 Andrea Holm and Jared Clark are the two that are doing that
18 today and Thursday. So when it is your turn to speak, we
19 will ask you to unmute when you are called on. You might
20 see a pop-up on your screen that says, "The host has asked
21 you to unmute yourself." You're welcome to turn on your
22 camera or leave it off. You can leave it off if you don't
23 want it. It's optional. Both the mic and the camera are on
24 the left-hand side of the Zoom taskbar, and also next to
25 your name in the participant list, if you access it that

1 way.

2 If you're on the phone only and don't have a
3 mute button, you can hit star six, and that toggles you
4 between mute and unmute. Also, if you dialed into the call
5 today instead of joining Zoom online, please make sure that
6 it's the phone number that you provided when you registered.
7 If not, shoot me an e-mail, and I'll try to keep an eye on
8 my e-mail. We'll only be able to find you by your phone
9 number. Please state your name and affiliation for the
10 record when you start your comments, and then I'll start
11 your timer. Each commenter has three minutes to speak, and
12 I'll start the timer when we start speaking, and you'll hear
13 a really obnoxious beep, which I'm going to test for you
14 guys now. It's not on camera at the moment, but it will
15 beep. I'm going to do the audio, though, for you now.
16 Hopefully, everybody can hear that. I got a couple of
17 thumbs up here.

18 At the end of your comment, the end of the
19 feature, I'm going to invite the NOP members to ask
20 questions, so don't automatically mute yourself and run away
21 from your computer.

22 All right. I'm going to turn the mic over to
23 Erin Healy now. She -- Erin is the director of the
24 Standards Division, and she's going to give us some
25 welcoming remarks. Erin.

1 BOARD MEMBER HEALY: Thank you. Can you all
2 hear me okay? Yes? Okay. Well, thank you for everyone
3 who's joining us today. Public commenters, thank you for
4 engaging in this process. It's really important that we
5 hear from you all about what's happening in your world out
6 in the field or somewhere along the organic supply chain, so
7 thank you for participating.

8 I do want to take a moment to acknowledge the
9 impacts that the two storms had, Hurricanes Helene and
10 Milton on the southeast. There were board members impacted.
11 I'm sure many stakeholders in the organic community were
12 impacted. It was really heartbreaking to see the
13 destruction and the devastation from these storms. And so I
14 want to say that our thoughts are with the southeast region
15 and those who have been impacted.

16 We know that farming has become more challenging
17 in a changing climate, and I want to recognize the efforts
18 of all of those working across the organic supply chain,
19 despite these challenges, to bring us food and textiles, and
20 to be good stewards of the earth and the resources. So I
21 just wanted to take the time to acknowledge that before we
22 continue.

23 This meeting, like other meetings of the National
24 Organic Standards Board, will be run based on the Federal
25 Advisory Committee Act and the Board's Policy and Procedures

1 Manual. Kyla Smith, our board chair, will facilitate the
2 sessions. We also want to remind everyone this is an open
3 and transparent process. Please be respectful of everyone.
4 Please try to avoid any personal attacks, and this extends
5 to the chat messages as well. So even if someone disagrees
6 with another speaker's position, please be sure to provide
7 them the same respect and grace that you would want for
8 yourself when you were commenting.

9 And finally, I want to thank my amazing team, and
10 specifically Michelle Arsenault, Andrea Holm, Heather Kumar,
11 Johanna Mirenda, and Jared Clark. Yes, let's give them a
12 Zoom round of applause. I am just so lucky and so grateful
13 to have such an awesome team. They're all incredibly smart,
14 wonderful people, and lovely to work with. So thank you to
15 them for making all the behind-the-scenes happen for this
16 meeting. I will now hand the mic back to Michelle and
17 she'll do roll call. Thank you.

18 MS. ARSENAULT: Thanks, Erin. All right. Board
19 members, let's test your mic and continue to do a roll call.
20 Kyla Smith.

21 BOARD MEMBER SMITH: I'm here. Hello, everybody.

22 MS. ARSENAULT: Welcome, Kyla. Amy Bruch.

23 SECRETARY BRUCH: Good morning from the heartland.
24 Thank you.

25 MS. ARSENAULT: Good morning, Amy. Nate Lewis.

1 BOARD MEMBER LEWIS: Present.

2 MS. ARSENAULT: That was a little muffled, Nate.
3 Try again.

4 BOARD MEMBER LEWIS: How about now? I'm present.

5 MS. ARSENAULT: A little faint.

6 BOARD MEMBER LEWIS: It's a little faint. Kyla
7 just grimaced. It's a little faint. Get closer to your
8 mic.

9 All right. Brian Caldwell.

10 BOARD MEMBER CALDWELL: Hi, everyone.

11 MS. ARSENAULT: Hi, Brian. Welcome. Jerry
12 D'Amore.

13 BOARD MEMBER D'AMORE: Good morning from
14 California.

15 MS. ARSENAULT: Good morning, Jerry. Carolyn
16 Dimitri.

17 BOARD MEMBER DIMITRI: Hi, everyone.

18 MS. ARSENAULT: Hi, Carolyn. That was a little
19 fake on my end. Maybe I need to turn up my microphone. Kim
20 Huseman.

21 BOARD MEMBER HUSEMAN: Present.

22 MS. ARSENAULT: Hi, Kim. Mindee Jeffrey.

23 VICE CHAIR JEFFREY: Hello.

24 MS. ARSENAULT: Hi, Mindee. Allison Johnson.

25 BOARD MEMBER JOHNSON: Yeah, good morning.

1 MS. ARSENAULT: Good morning, Allison. Dilip
2 Nandwani.

3 BOARD MEMBER NANDWANI: Hello. Good morning, all.
4 Hello, Dilip. Logan Petrey.

5 BOARD MEMBER PETREY: Hi, good morning. And thank
6 you, Erin, for highlighting the storms and the impact.

7 MS. ARSENAULT: Nate Powell-Palm.

8 CHAIR POWELL-PALM: Good morning, everyone.

9 MS. ARSENAULT: Good morning, Nate. Franklin
10 Quarcoo.

11 BOARD MEMBER QUARCOO: Present.

12 MS. ARSENAULT: Thank you, Franklin. And Wood
13 Turner.

14 BOARD MEMBER TURNER: Good morning, everybody.

15 MS. ARSENAULT: Hi, Wood. Welcome. And Javier
16 Zamora. All right. I note Javier is absent. And now I'm
17 going to hand the mic off to Kyla Smith, chair of the
18 National Organic Standards Board, to start the meeting.
19 Kyla.

20 BOARD MEMBER SMITH: Hi, everybody. Good day, as
21 Michelle likes to say, remind us that that covers all of the
22 time zones. So good day to you all. And thanks for joining
23 us to kick off the fall 2024 NOSB meeting here with the
24 first day of public comments. Before I get into the
25 standard reminders, I wanted to echo the sentiments made by

1 Erin in her opening remarks and offer some good thoughts and
2 prayers to those that are dealing with the various natural
3 disasters that we are facing here in the U.S. I know many
4 of our community are coping with the aftermath of the two
5 hurricanes in the southeast and the current wildfires in the
6 west. And, unfortunately, we are experiencing the effects
7 of our changing climate in very extreme ways. And during
8 these challenges, it is ever more important to remember our
9 connectedness and to support one another. At the end of the
10 day, that is the only thing that is going to get us
11 through -- connection, community, and support. So be safe
12 out there. And with that, I will move into some of our
13 standard reminders, and then we'll get started.

14 So just a reminder that there is a policy in the
15 policy and procedures screen. All speakers who will be
16 recognized signed up during the registration period.
17 Persons must give their names and affiliations for the
18 record at the beginning of their public comment. Proxy
19 speakers are not permitted. Individuals providing public
20 comment shall refrain from making any personal attacks or
21 remarks that might malign the character of any individual
22 entity or organization. Members of the public are asked to
23 define clearly and succinctly the issues they wish to
24 present before the board. This will give NOSB members a
25 comprehensible understanding of the speaker's concerns. I

1 will call on speakers in the order of the schedule and will
2 announce the next person or two so they can prepare. Please
3 remember to state your name and affiliation, and then we
4 will start the timer, and I'll continue to remind folks of
5 that throughout the day.

6 Board members will indicate to me if they have
7 questions. You guys can use your raised hand button on
8 Zoom. That's the best way I can keep you in queue, but, you
9 know, if you just raise your hand, I'll get you in there,
10 too, and I will call on you.

11 Okay. Only NOSB members are allowed to ask
12 questions. At the end of each day, I will do a sweep of
13 speakers that we missed throughout the day. So I'm just
14 going to do that one time at the end of each day. So tell a
15 friend to tell a friend that that's the plan.

16 Our first speaker will be Terry Shistar. And then
17 we have Mark Kestel, and then Lauren Pope. So those are the
18 first three speakers. I see Terry is ready. Terry, do you
19 have slides?

20 MS. SHISTAR: Yes, I have slides.

21 BOARD MEMBER SMITH: Okay. Can we get Terry's
22 slides up, please? And then you can get started. And don't
23 forget, name and affiliation. Thanks, Terry.

24 MS. SHISTAR: Hi. My name is Terry Shistar, and
25 I'm on the board of directors of Beyond Pesticides. Please

1 feel free to ask me or Jay about our written comments. What
2 does Beyond Pesticides mean? We hope it means organic.
3 Next slide, please.

4 We're focused on three intertwined existential
5 crises in which pesticides play a role -- climate change,
6 human illness, and biodiversity decline. Next.

7 Organic practices can and should play a major role
8 in addressing all of these. Organic can mitigate climate
9 change, also provides a framework for eliminating toxic
10 chemicals in organic production and processing, and
11 protecting biodiversity is central to the definition of
12 organic production in the regulations. But some challenges
13 remain before organic can be the answer. Next.

14 Organic production can mitigate climate change
15 only if it is soil-based, because soil-building practices
16 help sequester carbon in the soil. The NOSB must take a
17 strong stance against certifying hydroponic and container
18 systems that do not build soil biology. Next.

19 Although the NOSB does a good job of keeping toxic
20 active ingredients out of organic production, so-called
21 inert ingredients make up the largest part of formulations
22 and pose greater risks. Next.

23 The Materials Subcommittee has proposed two
24 alternatives, one of which would address this problem and
25 the other would not. The NOSB should recommend only option

1 one, which meets the requirements of AFA and not forward the
2 recommendation for option two to NOP. Option two relies on
3 EPA's decision that residues in food do not pose a risk, and
4 it ignores risks to farmworkers and the environment. Next.

5 Another way that toxic chemicals can enter organic
6 food, and by which organic processing fails to promote the
7 health and environmental precepts of organic, is the
8 allowance for nonorganic ingredients through listing on 606.
9 There's no reason that organic production cannot meet the
10 needs for these ingredients, if processors are not allowed
11 to use cheaper nonorganic ingredients. Besides removing
12 potential toxic exposure to consumers, elimination of these
13 nonorganic ingredients would avoid supporting chemical
14 intensive agriculture. The NOSB should also work towards
15 elimination of toxic chemicals, such as plastics, PFAS, and
16 bisphenols in food packaging. Next.

17 The NOSB and NOP have made strides towards
18 protecting biodiversity and materials reviews and policies,
19 but still need to address implementation of the policy to
20 eliminate the incentive to convert native ecosystems to
21 organic production, implementing the marine materials
22 policy, and phasing out the use of plastics. Next. Thank
23 you.

24 BOARD MEMBER SMITH: Thanks, Terry. Any
25 questions from the board? I don't see anybody. Thanks,

1 Terry. Appreciate it. Oh, wait. Sorry. Last minute.
2 Nate.

3 CHAIR POWELL-PALM: All right. Can folks hear
4 me all right? I'm leaning in. Okay. Thanks, Terry, for
5 your comments. And, again, always appreciate your
6 leadership on the topic of inerts. I know you've been
7 working on that forever. I do have a question not on that
8 topic but related to ethylene. That's a material that I'm
9 handling. And I note that in your written comments, Beyond
10 Pesticides opposes its listing because, you know, a number
11 of -- you describe your reasons really well. But my
12 curiosity is around your thinking related to its potential
13 to replace the clove oil, which is currently used in sprout
14 inhibition and something that, because it's natural, we
15 don't really get to review regularly through the Sunset
16 process. But we hear from growers that clove oil is an
17 irritant and that workers don't like it. It's not
18 particularly effective, and this could be a good
19 alternative. So just curious, you're thinking about, like,
20 weighing synthetics against nasty naturals and, like, how do
21 we sort of balance those concerns?

22 MS. SHISTAR: Well, our law presents us with a
23 preference for natural materials, right? And asks us to
24 show that the synthetic materials meet certain criteria
25 before they can be used. And if we think that a natural

1 material is bad, then we should go through the process of
2 listing it on 602 or, you know, or -- eliminating it from
3 the use in organic. That's -- that's the way I view that
4 balancing.

5 BOARD MEMBER SMITH: Amy?

6 SECRETARY BRUCH: Thanks, Kyla. Terry, thank
7 you so much for your comments, your written ones, as well as
8 the oral ones.

9 I had a question about some of your written
10 comments on fraud. You mentioned that the fraud equation is
11 complex. And you said NOSB and NOP must craft a multi-
12 faceted strategy if we're going to prevent organic fraud.
13 So I'm just kind of wanting to know, we're doing a lot. NOP
14 is doing a lot. NOSB, we've had this become a big focus.
15 But what more can we do to move the needle and uphold
16 integrity, especially in the light of the age we're in with
17 technology? So could you speak on that a little bit more?

18 MS. SHISTAR: I wish I could. I'm not sure that
19 I'm the right one to give you the answer to that question.

20 SECRETARY BRUCH: Okay.

21 MS. SHISTAR: You know, (indiscernible) is part
22 of the National Organic Coalition. And I know that there
23 are other members of the National Organic Coalition who
24 could give you a much better response than I can.

25 SECRETARY BRUCH: Okay. I'll save this question

1 for them, then. Thank you, Terry. I appreciate your time
2 today.

3 BOARD MEMBER SMITH: Thanks, Terry. Okay. I
4 don't see anybody else, board members. So I'm going to move
5 to Mark Kastel, then Lauren Pope, then Jay Feldman. Lauren,
6 do we have you? Oh, I'm sorry. Mark. Mark first. I'm
7 already messing up. Sorry, Mark. You can get started here.

8 MR. KASTEL: I'm trying to unmute. Am I
9 unmuted? There's some kind of dialog box starting here.
10 Okay. Thank you very much. My name is Mark Kastel. I am
11 the executive director of Organic Eye. We're a farm policy
12 research group based in LaFarge, Wisconsin. We act as an
13 organic industry watchdog. Why should organics be any
14 different than any other regulatory scheme in Washington?
15 When we lobbied for OFPA, the answer was, because we said
16 so. Is this board an enabler? Your members suffer from the
17 Stockholm Syndrome. Our participants in this virtual room
18 just bid players in the organic regulatory theater. You
19 tell me, have we betrayed the true owners of the organic
20 label?

21 Up to 20,000 animals on organic dairy farms milk
22 three or four times a day with stocking densities as high as
23 ten or twenty cows per acre in the desert. Forget about
24 feed the soil, not the plant, the original mantra of the
25 organic nutrient dense farming movement. You can grow it in

1 Canada or in Holland hydroponically in countries where it's
2 illegal to be labeled organic, and then ship them here.
3 Profit before principle, profit before the law governing
4 organics.

5 We have the NOP looking the other way as they
6 audit certifiers, which are accepting millions of dollars
7 from corporate agribusinesses in donations and sponsorship
8 over and above the certification fees. We have literally
9 boatloads of imports coming in from countries with endemic
10 levels of commercial fraud and past fraud in organics,
11 coming from farms without organic certification or annual
12 inspection. We leave that up to the internal control
13 systems and to the for-profit certifiers and their for-
14 profit agribusinesses to work out the details.

15 What could go wrong? Try a half percent or 1
16 percent of U.S. farmland managed organically in the U.S. No
17 matter the growth of the industry -- meteoric growth, that's
18 stuck. Never budes. Hundreds of organic family farmers
19 have gone out of business while the USDA spends tens of
20 millions of dollars to recruit more fodder. Without market
21 enforcement, they don't have a future.

22 Questions? Ask me about whether we should approve
23 a material at Sunset that the World Health Organization
24 considers a carcinogen, celery powder. The American Cancer
25 Society says no. Testing -- all imports should be tested,

1 period. The costs are inconsequential. The risks are
2 unquestioned. Risk-based oversight. Organic Eye has
3 proposed doing away with annual inspections when operations
4 earn that. Inspect every five years by seasoned
5 agriculturalists and forensic accountants. That would free
6 up resources for aggressive residue testing and spot
7 inspections.

8 Synthetic compounds in compost -- give me a break.
9 We all know that some plants are very good at uptaking
10 compounds from the soil and incorporating them into their
11 tissues. What do you want to eat? What do you want your
12 family to eat? And what do you think organic means? Thank
13 you very much.

14 BOARD MEMBER SMITH: Thanks, Mark. Questions for
15 Mark? Go ahead, Amy.

16 SECRETARY BRUCH: Mark, thanks for your time
17 today. Thanks for touching on some of our work agenda
18 items. You mentioned risk-based certification. One of the
19 questions that we had in that document was, what do you
20 think the unintended consequences would be if we are to
21 shift to more of a risk-based system? Could you respond to
22 that?

23 MR. KASTEL: Well, I hope there are consequences,
24 intended or unintended. Because this current system amounts
25 to busy work. We treat everybody the same. When I was

1 certified, I probably could have earned a bye if we had a
2 system that was focused on true risk. And so that based on
3 performance, based on record keeping, based on inspections,
4 based on the type of crops and the history of fraud. But
5 when I said all imports should be tested, one shift by the
6 estimate of O-Farm, which represents U.S. organic grain
7 farmers, one shift represents the annual output of, they
8 were estimating, 40 to 50 average U.S. farms. Think about
9 what it costs to certify 40 or 50 average farms. And then
10 think about what the added cost would be, the value of that
11 cargo, and the added cost to test it.

12 So, you know, in our recommendation, instead of
13 having a labor shortage and recruiting young people without
14 experience in production, agriculture, or forensic
15 accounting, if we concentrated our resources into less
16 periodic inspections, we would have a lot available for
17 skilled practitioners to do unannounced inspections and an
18 abundance of testing. And because you've seen the major
19 fraud, you've seen the Washington Post, you've seen the work
20 Organic Eye does, none of that has come out of annual
21 inspections. And so we're doing a lot of busy work. We're
22 spending literally millions of dollars of taxpayer money and
23 money coming from organic operators, and we're not getting
24 the job done. So let's look at all terms.

25 SECRETARY BRUCH: Thanks Mark.

1 BOARD MEMBER SMITH: Thanks, Mark.

2 MR. KASTEL: Thank you.

3 BOARD MEMBER SMITH: Okay. Thanks for your time
4 today. Next up, we have Lauren Pope, then Jay Feldman, then
5 Ed Volpe. You can get started here. Don't forget to state
6 your name and affiliation. Thanks.

7 MS. POPE: Thank you. Hello. My name is Lauren
8 Pope, and I'm a certification and policy specialist with
9 OFA. We certify about 1,100 organic farmers and food
10 processors in a 12-state region. OFA supports the effort to
11 deter fraud and to keep the organic label meaningful. We
12 approve of the aim of risk-based certification to reduce the
13 burdens on small farmers and their certifiers, but are
14 concerned that this could widen discrepancies between
15 certifiers and burden small operations further.

16 As noted in the discussion document, risk and
17 other associated terms are not defined in the regulations.
18 If certifiers are focusing on risk in different ways, this
19 could lead to people seeking out certifiers they think will
20 be the most permissive. As for smaller operations, while
21 paperwork and yearly inspections take time and effort, these
22 are not just tools for fraud prevention with no other
23 benefits. These are important check-ins to make sure small
24 issues do not become bigger and costlier to correct.

25 While certifiers, like all members of the public,

1 have the opportunity to comment on proposed rules, we have
2 the responsibility to implement the rules. This is made
3 more difficult when a rule has changed from when it was
4 proposed to when it is published. For that reason, even at
5 the risk of lengthening the regulatory process, we suggest
6 that certifiers be allowed to comment on any rule where the
7 language has changed from the proposed rule to the final
8 rule. This is not to allow certifiers to influence the
9 process, but to have certifiers give feedback on ways the
10 regulatory language could be improved. Certifiers have on-
11 the-ground experience that is currently not being
12 effectively used.

13 And, finally, when speaking of the need for
14 certifier input into the creation of NOP regulations, I'd
15 like to touch on the topic of hydroponics. The lack of
16 standards and the lack of consensus on whether hydroponics
17 belong in organic production has led to inconsistency among
18 certifiers. And this inconsistency is reflected in the
19 products labeled organic that consumers have access to.

20 On a personal note, my mother was born in Western
21 New York and grew up picking raspberries that grew wild
22 around her house. She now lives in New Mexico, and when she
23 wants berries, she has to go to the grocery store. Over the
24 last few years, she's found some organic berries for sale to
25 not be very flavorful. When she mentioned that to me, I

1 wondered if they were hydroponically grown. My mother had
2 no idea that was allowed. She stopped buying organic
3 berries because she just doesn't know what she'll get.

4 While the board has requested that growers
5 provide information on whether their sales are affected by
6 hydroponic producers, we are missing crucial detail on how
7 consumers would act if they have the transparency needed for
8 an informed decision, and no information on how consumers,
9 like my mother, may have become disappointed and
10 disincentivized to buy organic. Thank you.

11 BOARD MEMBER SMITH: Thanks, Lauren. Any --
12 okay. I see one from Nate Powell-Palm. Go ahead, Nate.

13 CHAIR POWELL-PALM: Hi, Lauren. Does your mother
14 not buy any berries now or does she buy --

15 MS. POPE: She has completely given up on
16 berries.

17 CHAIR POWELL-PALM: Okay. Thank you.

18 BOARD MEMBER SMITH: Anybody else? If not, I
19 have one. Okay. I'll call on myself.

20 Thanks for your comments on risk-based oversight.
21 And so I -- in your comments here today, and in OFA's
22 written comments, I feel like, you know, you recognize in
23 the balance that certifiers are facing in, like, staffing
24 and resources, as well as -- and how to, like, apply this
25 risk-based approach and some of the unintended consequences.

1 And so, I mean, like, do you have any thoughts about, like,
2 how do we strike that balance? Because it doesn't seem like
3 the current system is fully working. And so just wanting to
4 explore some things that might have us to be able to focus
5 on areas that need a little bit more focus while trying to
6 solve for some of the things that you, you know, mentioned.
7 So, any -- like, how do we strike that balance?

8 MS. POPE: Yeah, I mean, it's definitely hard.
9 And, again, I do worry that one of the unintended
10 consequences might be that smaller farmers who maybe don't
11 keep their paperwork as well will appear riskier than, say,
12 a large operation that might be hiding fraud under a lot of
13 well-done paperwork. You know, as for solutions, it is hard
14 to say. I don't know that I have anything off the top of my
15 head, but it's definitely something we would hope that the
16 NOP would work with certifiers on since we do have these
17 experiences and do have these ideas.

18 BOARD MEMBER SMITH: Thanks, Lauren. Okay. I'm
19 not seeing any other questions.

20 Moving on to Jay Feldman, then Ed Maltby, and
21 then Bruce Kaser. Jay, you are with us. Great. And you
22 can get started.

23 MR. FELDMAN: Members of the NOSB, thank you for
24 your service. I am Jay Feldman, Executive Director of
25 Beyond Test Sites. The NOSB was established to protect and

1 enhance the integrity of the organic label. Integrity is
2 operationalized through continuous improvement, which is key
3 to the Sunset process with synthetic materials on the
4 National List of Allowed and Prohibited Substances, and
5 through your oversight of the USDA's National Organic
6 Program. It is in this spirit that we offer our extensive
7 written comments. We look to organic to lead the shift away
8 from petrochemical pesticides and fertilizers with urgency
9 to confront the existential health, biodiversity, and
10 climate crises of the day. We don't want cancer in our
11 families or the long list of pesticide-induced illnesses
12 associated with chemicals used in chemical-intensive
13 agriculture, chemicals that end up in our air, water, soil,
14 and food.

15 However, this shift will only happen if we as an
16 organic community and as an organic marketplace move quickly
17 and forcefully to differentiate organic from all the
18 destructive agricultural practices that contribute to the
19 existential crises. It was not hard to predict that PFAS
20 would end up contaminating foreign land. Same for DDT.
21 Contaminated biosolid fertilizer is a cheap waste products,
22 but the externalities of cleanup and remediation, if that is
23 even possible, are certainly not cheap. Neither is the
24 treatment of resulting illnesses and environmental
25 disasters.

1 We had the foresight to prohibit biosolids and
2 organic production. Of course, the problem extends beyond
3 biosolids to compost. We urge the NOSB to reopen the work
4 plan item on contaminated inputs that is currently on hold
5 after the issuance of the 2014 document on this issue when I
6 was on the NOSB. But first, we must not further weaken the
7 standards or exacerbate the problem. As important as
8 compost is to organic, only synthetic materials that are
9 specifically added to the national list should be allowed in
10 compost. More persistent contaminants in compost feedstocks
11 will certainly be found. Petition from BPI should be
12 denied. Thank you, Crop Subcommittee, for recommending
13 against and rejecting some arbitrary, de minimis or
14 negligible risk assumptions far into the Organic Foods
15 Production Act.

16 With this same thinking, organic must lead on
17 eliminating plastics. Plastic research continues to raise
18 alarms about the hazards associated with the use of plastic,
19 including microplastic particles that are distributed in
20 alarming amounts throughout the environment and taken up by
21 organisms, including humans. Make elimination of plastic
22 and organic a research priority and move quickly to action.

23 Additionally, we must push harder to replace
24 nonorganic ingredients more broadly used under the proposal
25 to delist dried organic orange pulp, which is available in

1 organic form, and organic seed starts must become a
2 priority, given their limited availability. Thank you again
3 for your service.

4 BOARD MEMBER SMITH: Awesome. Thanks, Jay. Any
5 questions for Jay? And one from Mindee.

6 VICE CHAIR JEFFERY: Hi, Jay. Thank you for your
7 comments. In the nuances of proposing new definitions for
8 the regulations, we added the -- to the compost definition,
9 it used to say plant nanomaterial, and we added the nuance
10 of, "or a synthetic feedstock that's on the national list."
11 And I was wondering if you had any perspective on whether
12 adding that adds protection to the NOSB process for
13 considering synthetics or if you had another perspective on
14 that addition.

15 MR. FELDMAN: You know, this is -- thank you for
16 the question. It is a difficult question. You know, the
17 problem, of course, is we're faced with the reality of
18 synthetics being in compost. Right? And so -- even in
19 food-based compost. So the question is, you know, if we're
20 talking about, you know, a feedstock that we know of and we
21 know it's synthetic, we should certainly be evaluating that
22 if it has to be in there. I mean, my preference, of course,
23 I think most people's preferences, those eaters of organics
24 would prefer that we not have any synthetics in organic.
25 You know, that is the default assumption in OFA. But given

1 the realities that we're faced with, I think it's we have to
2 set up a process to evaluate any synthetics that we know are
3 being added to feedstocks and that are in there so that we
4 can protect the public. And as was said -- by many of you
5 has been said, we have to maintain our transparency with the
6 public. That's our credibility. That's our -- that's the
7 way we maintain the market and build the market. I hope
8 that answers the question.

9 BOARD MEMBER SMITH: Anybody else? People are a
10 little slow to their hands today. So I'm just going to give
11 them a minute. Okay. Last call. All right. Thanks, Jay.

12 MR. FELDMAN: Thanks so much.

13 BOARD MEMBER SMITH: Next up, we have Ed Maltby,
14 then Bruce Kaser, and then Ellie Hudson. Ed, if you can
15 state your name and affiliation and then get started.

16 MR. MALTBY: Thank you. My name is Ed Maltby.
17 I'm the executive director of the Northeast Organic Dairy
18 Producers Alliance and a longtime livestock farmer. Thank
19 you to the NOSB members for their time and service to the
20 organic community. I'd like to speak on Meloxicam.

21 Most organic dairy producers will welcome the
22 addition of Meloxicam to the basket of products they can
23 use, especially its reputation for providing long lasting
24 pain relief at times of stress for livestock and the ease of
25 application. NOSB joins with Organic Farmers Association,

1 National Organic Coalition, Western Organic Dairy Producers
2 Alliance, and other producers in urging the board to support
3 the use of Meloxicam annotated only for the dehorning and
4 disbudding of bovine calves under one year, and recommend
5 the board send the broad uses of Meloxicam back to the
6 livestock subcommittee and request a technical review to
7 inform decision making regarding potential uses for other
8 livestock, including poultry. The petition in the NOSB
9 Livestock Subcommittee Review stated the petition was
10 submitted by certified organic livestock producers and
11 supporters. While the petitioners' companies do represent
12 large volumes of organic milk sold in the U.S., the petition
13 does not represent the views of all organic dairy producers
14 and other livestock producers. Most producers do not
15 support the process the Livestock Subcommittee used to reach
16 their recommendation of approving a new drug for all organic
17 livestock that is not approved by the FDA.

18 The petition and subcommittee review focused on
19 Meloxicam as it applies to bovines, rather than all
20 livestock, and we have the following concerns with
21 subcommittee decisions to do an internal review, rather than
22 an independent technical review, TR. An independent TR
23 ensures the integrity of the NOSB process and verifies what
24 is presented in a petition and the subcommittee review. An
25 independent TR provides a reference for all NOSB members,

1 community members, reporters, and concerned consumers on
2 recommendations made. A TR allows future boards to
3 understand the rationale behind the recommendation. A TR
4 provides an independent scientific assessment that will be
5 used during the process of rule writing and reviewed by
6 different departments within the USDA and other agencies,
7 especially when the review reaches the USDA office for the
8 general counsel. An internal review by a FACA committee has
9 little standing within the process. The subcommittee review
10 has no mention of the qualifications of the committee
11 members who complete the internal technical review, no
12 printout of the internal TR, or any detailed notes in the
13 subcommittee minutes to show the discussion on the breast of
14 the review.

15 BOARD MEMBER SMITH: Thanks, Ed. I see a
16 question from Nate.

17 CHAIR POWELL-PALM: Hi, Ed.

18 MR. MALTBY: Hi.

19 CHAIR POWELL-PALM: Could you please kind of
20 paint a picture for me for how you think organic does, as
21 far as animal welfare? Do you feel like we are a standard
22 that puts animal welfare first? Do you feel like we're a
23 standard that could claim to consumers that we are animal
24 welfare forward? And I'll leave it there for a minute.

25 MR. MALTBY: Yeah, I think the organic

1 certification process views animal welfare holistically. We
2 don't view animal welfare just on what drugs can be
3 consumed, what doesn't. But we look at it from the point of
4 view of natural behavior. We look at it from the point of
5 view of building an immunity within a herd that can have a
6 holistic approach to animal welfare and maintaining it. And
7 by that, we, I think, achieve a very high level, not quite
8 the gold standard of animal welfare. It is third-party
9 certified, which very few of the other companies go to
10 extent with the legal support that organic does.

11 CHAIR POWELL-PALM: I appreciate where you're
12 going. I don't think paperwork could really be said to help
13 an animal that's in acute pain. So as a livestock producer,
14 I'm wondering if you could speak to how we can have calves
15 not have every tool in the toolbox to prevent pain during
16 dehorning, or as a livestock producer, I'm sure you can
17 appreciate a cow that has a severe injury that is
18 experiencing a lot of pain to be given all the resources we
19 have. I'm really glad someone doesn't say to me that
20 there's a holistic program if I break my arm, that everyone
21 is looking at it holistically. I would like to be able to
22 have the tools to fix my arm. So could you say just a
23 little bit more about how you think about managing that we
24 have living creatures who are in our care and service, and
25 we should be doing everything we can to take care of them?

1 How do we balance that against your sort of holistic paper-
2 based attributes?

3 MR. MALTBY: Well, I would dispute that it's
4 paper-based holistically. You've got the practitioner who
5 is the farmer, and you've got the relationship with animals.
6 And under the organic regulations, if an animal reaches a
7 stage where it's in intense distress, it must be treated
8 with whatever drug is available. And if that causes its
9 certification to lapse, then that is necessary. That is
10 required. And our recommendation that, in fact, this should
11 be immediately used for -- available for dehorning, to me,
12 personally -- speaking personally, having dehorned many
13 calves, then to me it is a somewhat barbaric process. And
14 whatever can be done to mitigate any pain, I think should be
15 applied immediately. We do have some drugs that are used
16 right now, and there are many more herds now that are moving
17 towards uphold livestock with the increase in the
18 availability of quality semen.

19 From the point of view of introducing a new drug
20 into organic certification, what we're saying is let's do
21 the process right. Let's have a TR. If the TR does come
22 back with all the available evidence that can apply to all
23 livestock, and my experience is with quite a number of
24 different species, but I would never think of myself as
25 somebody who can comment on all livestock, then that gives

1 us the support to be able to go back to consumers and say,
2 look, we've done this right. We're bringing this drug in to
3 assist in the process of animal welfare. And we've gone
4 through the whole process and had it approved independently.

5 CHAIR POWELL-PALM: Sorry for running overtime,
6 Kyla. Thank you.

7 BOARD MEMBER SMITH: That's okay. Amy?

8 SECRETARY BRUCH: Yeah, thanks, Kyla. Ed,
9 thanks for your time today. I wanted to switch gears just
10 briefly and ask you on two Sunset materials that we're
11 reviewing in livestock, Moxidectin and Fenbendazole. There
12 was a question by a commenter that says clarity is necessary
13 for the definition of emergency use because both of those
14 substances are approved for emergency use. From a producer
15 standpoint, is that clear or do we need further
16 clarification on emergency use in the regulation?

17 MR. MALTBY: I think that's a problem that we've
18 been debating for many years and come up with different
19 ideas. Definitely, we need more definition around emergency
20 use. And again, the emergency use is for one time only.
21 It's not a blanket approval for use at any time you may
22 wish. So if there's a problem within a herd or a flock or
23 whatever, then use Fenbendazole as an emergency use, but
24 then go back and reexamine the system that causes you to
25 have to use it.

1 SECRETARY BRUCH: Thank you, Ed.

2 BOARD MEMBER SMITH: Thanks, Ed. Appreciate your
3 time today.

4 MR. MALTBY: Thank you very much.

5 BOARD MEMBER SMITH: We are going to move to
6 Bruce Kaser, sorry if I'm pronouncing that incorrectly,
7 Ellie Hudson, and then Zach Cahill. Bruce, name and
8 affiliation, and you can get started.

9 MR. KASER: Thank you. My name is Bruce Kaser.
10 I'm an organic hazelnut farmer out in Oregon. Many of you
11 know that our farm is involved in litigation that seeks to
12 have grower group certificates declared illegal. It's now
13 likely the litigation is going to last for years until all
14 the issues are resolved.

15 In general terms, grower groups involve licensing
16 use of USDA organic seal to foreign agribusinesses that
17 aggregate crops from large numbers of uncertified farms in
18 court filings. USDA attorneys have admitted that these
19 farms are not certified because it would be absurd or
20 impossibly burdensome for a certifier to inspect them. And
21 those are the USDA's words, they're not mine. Let me give
22 you an example.

23 There's a privately owned Netherlands company
24 that operates one grower group in Ghana and another in the
25 Ivory Coast, Africa, both certified by EcoCert. EcoCert

1 indicates that these two groups together consist of an
2 aggregated 503,000 acres. That's about 786 square miles.
3 And the USDA and SEBRI database falsely calls it all
4 certified -- certified acreage. Even though, as I just
5 mentioned, the USDA's attorneys call that absurd, which I
6 happen to agree with. This is not organic certification of
7 small farmers. It is organic certification by default or by
8 something along the lines of desktop -- desktop audit for a
9 large aggregator that may or may not be providing any extra
10 benefit to small farmers, who, by the way, are held captive
11 to this very different kind of system.

12 The websites all show happy, smiling faces, but
13 who knows what is actually true. And meanwhile, the NOP, in
14 fact, it's on some of the screens here today, falsely tell
15 members of the public that every farm is inspected, when
16 that is simply not true. This creates quite a liability
17 problem. Annual farm inspection by an accredited certifier
18 is a necessary legal requirement for farm certification.
19 And independently, you can't use the organic seal unless
20 product comes from a certified farm. That's what our
21 statutes have clearly said for a long time.

22 So as a trademark attorney, it becomes obvious
23 that issuing crop certificates directly to aggregators
24 raises issues that include liability for illegal labeling.
25 The potential exposure -- the potential liability exposure

1 is large amounts of profits by those who do it.

2 BOARD MEMBER SMITH: Thanks, Bruce, for your
3 comments. Any questions for Bruce today? I see one from
4 Brian.

5 BOARD MEMBER CALDWELL: Thanks, Bruce. I think
6 this is a really difficult topic because everybody would
7 like to see organic certification for small-scale producers
8 all over the world, you know, to be facilitated and possible
9 for them to do. I'm wondering whether a risk-based approach
10 with some kind of random inspections of these aggregated
11 farms might be an alternative that would be acceptable.

12 MR. KASER: To me, the words risk-based approach,
13 they're slang for not doing farm inspections. I think
14 what's important is that you have to be honest with the
15 public. Tell the public that, oh, we're not inspecting
16 farms because we can't do it. So we've got this risk-based
17 approach mechanism, which means the certifier decides, well,
18 should we go look at farms or not? Or should internal
19 inspectors go look at farms or not? What we have now is a
20 system that requires no farm inspections at all. We have a
21 regulation that doesn't even require internal inspectors of
22 a so-called internal control system to go and visit farms.
23 So I see a lot of problems with risk-based management.

24 BOARD MEMBER CALDWELL: Thanks very much.

25 BOARD MEMBER SMITH: Any other questions? Thanks

1 for your time today, Bruce.

2 We are going to move to Ellie. Hello, Ellie.
3 And then we have Zach Cahill, and then Rachel Myers. Ellie,
4 name and affiliation, and you can get started.

5 MS. HUDSON: Thank you. Ellie Hudson, executive
6 director of the Accredited Certifiers Association, also
7 known as ACA. We are a nonprofit educational organization,
8 and our membership includes 64 certification agencies that
9 are accredited by USDA. Our mission is to ensure consistent
10 interpretation of the USDA organic regulations through
11 collaboration and education.

12 Hello, board members. Thank you for the
13 opportunity to share comments today regarding risk-based
14 certification and organic seed use. ACA colleagues will be
15 offering comment on additional topics later this week and
16 next. We applaud the Certification, Accreditation, and
17 Compliance Subcommittee for taking on the critical topic of
18 risk-based certification. Certifiers have a long track
19 record of adapting to changing needs and increasing
20 complexity. Even so, we believe it is risky and
21 unsustainable to continue responding to growth and changing
22 needs by adding ever more complexity. To avoid potentially
23 collapsing under the weight of the system, we as a community
24 must embrace a risk-based approach to certification. This
25 will be most effective if it is implemented thoughtfully and

1 consistently across certifiers. It can also facilitate the
2 redistribution of resources proportionally towards areas of
3 high risk. This gives us an even better chance to deter
4 fraud and advance all facets of organic integrity.

5 ACA is all in on supporting the thoughtful
6 development of a risk-based approach. We are already
7 underway in forming a working group dedicated to this topic.
8 The working group will develop tools to support a risk-based
9 approach to certification and compliance verifications
10 toward removing fraud and contamination from organic supply
11 chains. Certifiers and inspectors will vigorously and
12 systematically discuss and analyze the risk-based approach
13 and share findings and conclusions with the organic
14 community in a best practice document and potentially other
15 tools.

16 We are also in the process of updating the
17 existing ACA best practice for risk assessment and follow-
18 up, which was written in November 2019. We are at your
19 service to contribute to advancing this discussion.

20 Accompanied by Occam and his glorious razor, we are fully
21 expecting the implementation of risk-based certification
22 practices to be meaningful steps toward our vision, a world
23 where the USDA organic label is always trusted and valued.

24 Shifting for a brief comment on organic -- use of
25 organic seeds, certifiers are interested in this topic as it

1 impacts what must be included in an organic system plan and
2 how certifiers and inspectors interpret the commercial
3 availability requirements. We are very interested in the
4 work being done across the organic sector on this. We
5 intend to bring our perspective to work being done by the
6 seed trade and others. ACA will be participating in the
7 discussion on this topic next week in a meeting hosted by
8 the National Organic Coalition. We appreciate the NOSB's
9 work on these topics and look forward to future
10 collaboration and dialogue.

11 BOARD MEMBER SMITH: Thanks Ellie. Any questions
12 for Ellie? I see one from Brian.

13 BOARD MEMBER CALDWELL: Hi, Ellie. Thanks for
14 your comments. The timing is kind of remarkable here, but
15 my last question to -- about the group certification and
16 whether risk management could be applied to make that more
17 fraud-proof, I guess, is really the goal. I know you
18 haven't had time to think about this, but I just was
19 questioning whether, you know, off the top of your head,
20 whether you have any thoughts about whether that's feasible
21 or you can see any obvious problems with that.

22 MS. HUDSON: Yeah. I mean, I appreciate the
23 grace of this being sort of the first that that perspective
24 has really been brought before us. But I'll tell you that
25 the -- behind the scenes, the group text got a little bit

1 lit when you mentioned that last question. So I think we're
2 really interested in exploring that. I'll just say that.

3 BOARD MEMBER CALDWELL: Great. Thanks so much,
4 Ellie.

5 BOARD MEMBER SMITH: Amy.

6 SECRETARY BRUCH: Ellie, thanks for your time
7 today. Thanks for all the written comments, too. Also,
8 really appreciated learning about the tools you're
9 developing for best practices for the risk-based assessment
10 and the working group you have on residue testing. That's
11 great stuff, you know, propelling us forward.

12 Had two questions for you, mainly on the risk-
13 based certification. Do you see or perceive any tension
14 between gravitating toward a risk-based system and
15 certifier's accreditation requirements? Are those at odds
16 with each other, or are we kind of moving in the same
17 direction, or what can we do to help there?

18 MS. HUDSON: Yeah. I think, you know, shining a
19 light on that is probably the first step. And I think just,
20 very generally, we've engaged in some discussions with our
21 colleagues at NOP on this. You know, that's not really up
22 to the ACA or up to certifiers, but I think that we need to
23 be really transparent about that and, you know, not run from
24 it. So I don't have a lot of specifics to offer in that,
25 but I think that it's an area where it deserves a lot of

1 attention. We'd sort of expect that.

2 SECRETARY BRUCH: Great. And then the second
3 question, this was actually a written comment from a
4 certifier. When we're trying to identify risk, the NOP has
5 a complaint database. And I know sometimes folks don't have
6 all of the information to submit a formalized complaint, but
7 they have some information. So the certifier had mentioned
8 in written comments that perhaps there was some expansion to
9 the NOP complaint portal to include a more general category
10 for tips related to certain commodities or regions of risky
11 players, let's say. And they said the ACA could maybe
12 aggregate and manage that aspect. What's your thoughts on
13 that? I thought that was an interesting comment by a
14 certifier.

15 MS. HUDSON: Yeah. I mean, that's sort of the
16 first I've heard of that. But I also, you know, we -- ACA
17 works really closely with the National Organic Program, and
18 a lot of our priorities are aligned. But that's not to say
19 that all of our priorities strategically are aligned with
20 exactly in lockstep with the National Organic Program. We
21 do other things as well. And so I think that this
22 certainly, you know, would be something we'd want to take
23 up. It's not necessarily in our three-year strategic plan
24 today, but we could always discuss it. Things happen.
25 Things come up.

1 SECRETARY BRUCH: Yeah. Sure. I think that's
2 probably the thought is, you know, the nimbleness of
3 reacting is -- could be maybe improved, even if all the
4 evidence isn't substantiated to formalize a complaint; that
5 there's information and breadcrumbs, if you will, to point
6 of problems. So it's just where is the mechanism to capture
7 the qualitative problems in order to act a little quicker.

8 MS. HUDSON: Yeah. And I think, you know, we
9 consider that to be one of our superpowers, the ability to
10 be nimble and agile. And also, the fact that ACA, we are a
11 nonprofit. We are not ourselves a certification agency, but
12 we, you know, we convene the certifiers, and we provide
13 value in lots of different ways. And I think that sometimes
14 that we can sort of leverage that and work a little more
15 nimbly than even some of our members.

16 SECRETARY BRUCH: Thank you, Ellie. Appreciate
17 it.

18 BOARD MEMBER SMITH: I have one. I'm going to
19 try to be real brief because I'm against my own time clock.
20 I know this is an evolving process with risk-based
21 certification. What do you hope gets included in the next
22 round or what was the big thing that was missed that you --
23 concept-wise or specific, that you hope that gets included?

24 MS. HUDSON: Yeah. And I think, my colleague,
25 Marni Karlin, is probably going to be talking about this in

1 the in-person comments as well. So you might want to ask
2 her to elaborate. But I'll say, number one, we're focused
3 on right now keeping an open mind. You know, we don't want
4 to -- we don't know exactly where we're pointed yet. We
5 need to continue to gather information, so that we can make
6 good decisions about that. But I think one of the big
7 things is defining risk of what, what are we talking about?
8 There's been a number of comments made even just in this
9 first hour of the meeting that, you know, risk-based,
10 there's lots of different types of risk and different areas
11 that maybe even some we hadn't thought about. So I think
12 that's going to be key.

13 BOARD MEMBER SMITH: Yeah. Point well taken. It
14 was sort of tough to write that.

15 MS. HUDSON: Yeah. I mean, and you don't want to
16 make a glossary, because then that's a -- you know, could
17 potentially backfire. You know, we just, we're keeping an
18 open mind at this time.

19 BOARD MEMBER SMITH: Appreciate it, Ellie.
20 Appreciate your work.

21 Okay. Up next is Zach Cahill, then Rachel Myers,
22 and then Harold Austin. Hi, Zach, name and affiliation, and
23 you can get started.

24 MR. CAHILL: Hi, everybody. Good morning to the
25 NOSB board, and thank you for giving me the opportunity to

1 make comments at this year's meeting. My name is Zach
2 Cahill, and I am a second-generation organic dairy farmer in
3 Ferndale, California. I'm a policy committee board member
4 with the Organic Farmers Association, as well as a current
5 board president of the Western Organic Dairy Producers
6 Alliance. From an organic dairy farmer's perspective, there
7 are a few topics that I would like to focus on this morning.

8 First, I would like to speak about the
9 experiences that the organic dairy industry has had with the
10 rollout of SOE. While the efforts to curb fraud in the
11 livestock sector are needed and appreciated, I speak for
12 many dairy farmers when I say that it has been a frustrating
13 process to deal with this past year. For an example, while
14 I was told that my previous year's inspection was once
15 considered satisfactory, I later received an e-mail that I
16 still had outstanding follow-ups. I needed to provide lists
17 that were not available with the livestock tracking software
18 that I and many others currently use. The list would have
19 been simple to create if they were asked for it in advance
20 or quickly after my inspection, but backtracking the list
21 was extremely burdensome and time-consuming for all. I was
22 also asked for DamID and birth dates on organic animals that
23 I had purchased over five years ago from operations that are
24 currently no longer in operation.

25 After my certifier agreed that the information

1 wasn't asked for back when I purchased them, they informed
2 me that moving forward, I will need that information, which
3 is perfectly fine. My point is, as SOE develops, we need to
4 make sure that it is a forward-looking program and
5 understand that producers need to be clearly informed of
6 what changes are coming so that we can adapt appropriately.

7 I would also like to take time to address pasture
8 rule enforcement, specifically for DMI calculations for cows
9 and milk, because of the potential for falsifying cow
10 numbers on how the DMI is calculated. Currently, the
11 producer reports how many animals they have in each class
12 during different times of the year, grazing and nongrazing.
13 They can also choose how they calculate pasture intake
14 during those times. The producer can also choose to provide
15 the weights of those animals or the pounds of milk that they
16 produce. Because both the number of animals and the weights
17 of those animals can be falsified, I suggest that moving
18 forward, that the DMI calculation can only be derived from a
19 predetermined number from the USDA that factors the pounds
20 of milk produced into a dry matter demand figure so that the
21 DMI can be backtracked to monthly milk statements and feed
22 logs.

23 The final topic that I would like to address is
24 the Meloxicam petition. I would encourage NOSB to add
25 Meloxicam to the list of approved livestock materials only

1 for use in bovine animals under one year of age to assist in
2 pain mitigation while dishorning and disbudding. While a
3 comprehensive technical review would be beneficial for
4 future NOSB members, the dairy community would welcome this
5 addition to our toolbox assumed as deemed appropriate. We
6 need to take better steps toward pain mitigation for better
7 animal welfare, and this is a great step in the right
8 direction. Thank you for letting me speak on some of the
9 issues the organic dairy industry is facing today.

10 BOARD MEMBER SMITH: Thanks so much for your
11 comments, Zach. I see a question from Kim.

12 BOARD MEMBER HUSEMAN: Hi, Zach. Thank you for
13 your comments today. I really appreciate hearing through
14 your lens some of the challenges as a dairy producer that
15 you are facing. Can you expand on what pain management
16 tools you're currently using with your herds, both in your
17 steers for meat production, as well as dairy cattle
18 production?

19 MR. CAHILL: Yeah. So when we dishorn or debud
20 our calves, we use Lidocaine and then give them Banamine as
21 well. So the Lidocaine is a local numbing agent. Then the
22 Lidocaine -- or, sorry -- the Banamine helps with overall
23 pain.

24 BOARD MEMBER HUSEMAN: Are you castrating your
25 steers?

1 MR. CAHILL: No. No, we don't keep any of the
2 bull calves.

3 BOARD MEMBER HUSEMAN: Okay. What do those -- so
4 you sell those off pretty much immediately to a calf dairy?

5 MR. CAHILL: Right. Yeah. A guy comes up into
6 our neck of the woods and he takes all the bull calves or
7 the beef on dairy crosses, and then administers those to
8 different calf ranches over different parts of the state.

9 BOARD MEMBER HUSEMAN: Okay. And I imagine most
10 of those don't stay as reproductive animals in the male
11 species?

12 MR. CAHILL: No.

13 BOARD MEMBER HUSEMAN: Okay.

14 BOARD MEMBER SMITH: Nate?

15 CHAIR POWELL-PALM: Yeah. Just to follow up, so
16 you're suggesting that it only be used -- for disbudding,
17 you know, like your suggested annotation. What would you
18 use for pain management for older animals and what would
19 that restriction kind of prevent? What's the concern? What
20 are we trying to prevent there?

21 MR. CAHILL: So we don't want any of the residual
22 to be in the milk or meat supply. Where very little of our
23 dry cows go to slaughter, you know, only one time in their
24 lives. There's really not many circumstances where we would
25 need the use for Meloxicam in older animals. You know, they

1 give birth naturally. You know, if they had a real, you
2 know, odd health event, then, you know, there might be a
3 time that's appropriate to administer that, but that would
4 be administered by a vet anyway. But, no, for us, it's
5 primarily just for the calves when dehorning and disbudding.

6 CHAIR POWELL-PALM: Thank you very much.

7 BOARD MEMBER SMITH: Thanks, Doc. I have a
8 question. So you had talked about just some of the record-
9 keeping requirements, and particularly how that was
10 impacting you all and the dairy community as a result of
11 SOE. And I guess I'm just curious on if that was
12 specifically presented as an SOE requirement, in particular,
13 like the keeping of DamIDs and things like that, or just
14 curious about the linking of those two things
15 (indiscernible) and SOE.

16 MR. CAHILL: Yeah. So when my certifier asked me
17 for these backdated lists, they said, well, with the rollout
18 of SOE, that now means that the list that you provided us
19 was not satisfactory. And so we need that list as of
20 January 1st of last year. And so my question was, well, if
21 it was satisfactory then, why don't we just do this next
22 year, and you asked me for the updated list next year,
23 instead of going back and trying to, you know, cover our
24 tracks would not be the right term, but to, you know,
25 backdate documents that were not requested originally? It

1 was very hard for us to go back with our software, because
2 if we would have known moving forward or what all of our
3 herd list was as of today, that's easy. You know, we do
4 that all the time. But it doesn't allow us to go back to
5 previous days and make those lists. So we had to, you know,
6 go back on all of our handwritten records and match them up
7 with everything.

8 So, you know, I think at the end of the day, it
9 was a certifier who got their hands forced to ask for
10 additional information after our inspection already
11 happened.

12 BOARD MEMBER SMITH: Thanks. I don't see any
13 other questions. Thanks for spending your time with us
14 today.

15 MR. CAHILL: Yes.

16 BOARD MEMBER SMITH: And we will move on to
17 Rachel Myers, and then Harold Austin, and then Kate
18 Mendenhall. Hi Rachel, name and affiliation, and you can
19 get started.

20 MS. MYERS: Rachel Myers. I've been involved in
21 organic farming and certification for over 20 years. I've
22 worked on organic produce and dairy farms. I've also
23 conducted thousands of inspections on file reviews and
24 worked in quality management, quality systems management for
25 certifier accreditation. Three minutes has not given me the

1 time to include everything I would like to say, but the
2 comments submitted by IOIA and ACA do an excellent job
3 providing more detail. And I would like to voice my support
4 and agreement with their written comments.

5 I want to commend Congress for acquiring updates
6 to the standards that protect the reputation of organic and
7 the farmers and handlers that work so hard to do things
8 right, to the USDA for formally introducing risk-based
9 certification into the regulations, and to Kyla Smith and
10 the NOSB for bringing risk-based certification to the
11 forefront of discussion.

12 I can tell you from someone who has sat at
13 hundreds of kitchen tables and conference rooms that the
14 industry absolutely needs this, and we need it now. While
15 compliance to all of the organic regulations is obviously
16 critical, we need to be sound and sensible in our approach.
17 The administrative burden is crushing many small, low-risk
18 operations, and I am afraid that it will contribute, along
19 with record low pricing, to many operations leaving the
20 program if we do not change.

21 Risk-based certification is largely based on the
22 need for increased efficiency and capacity for both human
23 capital within the regulatory community and administrative
24 capacity on organic farms. We are lucky to have so many
25 brilliant and passionate minds in this industry, and I want

1 to strongly support the ACA working group. We need to bring
2 together key stakeholders to find workable solutions while
3 maintaining the integrity consumers rely on. A working
4 group allows for the agility and timeliness that we need.

5 Other key solutions that I would like to
6 encourage, exploration of risk-based certification that
7 encompasses more than just supply chain audits; a matrix for
8 inspections and compliance priority. Some areas of the food
9 industry consider deviations as majors and minors. These
10 are the highest priorities in the organic industry. And to
11 instruct your forms and inspections in a way that verifies
12 all of the regulations while focusing the human capital
13 where we need it and keeping certification affordable.

14 The adaptation and implementation of technology,
15 such as electronic OSPs, OCR technology, and AI, these are
16 powerful tools that will provide incredible assistance in
17 verification of compliance and create easy roadmaps and
18 collecting the right type of information from each risk
19 level. TopMoney may be a useful way of enabling low-tech
20 and no-tech operations to complete OSPs and other forms
21 online. The option of a universal-based OSP that allows for
22 consumer certifier customization while providing forms that
23 have a stamp of approval for the NOP. This will free up
24 valuable time for experienced quality personnel to focus on
25 other tasks, make accreditation audits easier, and allow for

1 better and more consistent training within the industry.
2 Some of this training could involve risk-based assessment.
3 It will also make it easier for TopMoney to create programs
4 that provide assistance to farmers who have questions about
5 completing or updating their OSP. I'll end with another
6 very sincere thank you for the opportunity to discuss this
7 issue.

8 BOARD MEMBER SMITH: Thanks. I think your last
9 words almost got interrupted by the buzzer there. Any
10 comments or questions for -- not comments -- questions for
11 Rachel? I don't see any. Thanks for your time today, and
12 thanks for your thoughtful solutions in both your comments
13 here, as well as in your written comments.

14 Okay. Next up is Harold Austin, then Kate
15 Mendenhall, and then Carl Block. Harold, name and
16 affiliation.

17 MR. AUSTIN: Good morning. My name is Harold
18 Austin. I'm a former member of the NOSB and current chair
19 of the Northwest Horticultural Council's Science Advisory
20 Committee and their Organic Subcommittee. I also serve on
21 the governing council for CORA, the Coalition for Organic
22 and Regenerative Agriculture based here in Washington State.

23 First, let me thank each of you, especially those
24 members of the NOSB that are about to sunset off the board.
25 My personal thanks to each of you for the time and the

1 energy that you have given on behalf of organic stakeholders
2 across our country. I've been in your shoes, I know what it
3 takes, and I can't tell you how much I appreciate what
4 you've done for our organic community.

5 Here in the Pacific Northwest, we're about 60
6 percent done with apple harvest, and with any luck and the
7 weather holding out, we should be done somewhere around the
8 week of the 11th of November. So still a little bit busy
9 here in the Northwest. I'd like to refer you to my written
10 comments that I've already submitted, along with those
11 submitted by the Northwest Horticultural Council, and also
12 those submitted for the very first time by the CORA group.

13 For handling, I support the continued relisting
14 for activated charcoal, peracetic acid, and hydrogen
15 peroxide. These three listings are still very important for
16 our organic handling process here in the Northwest. For
17 crops, because of the importance of these materials, I
18 continue to support the relisting of hydrogen peroxide,
19 ammonium soaps, potassium bicarbonate, magnesium sulfate,
20 horticultural oils, and the pheromones. These materials are
21 still used in our company's organic apples, pears, cherries,
22 wine grapes, and blueberry production. I would also like to
23 voice my support and stress the importance for us that the
24 petition for adding pear ester to the national list is to
25 our tree fruit industry, both here in the Northwest and

1 wherever apples and pears are grown in this great nation of
2 ours. This is one of the inert ingredients used by Tr c
3 Company in the production of their pheromones and their
4 mating disruption lures, lures and stuff that we've used for
5 multiple decades with no known harm to human health or the
6 environment that we're aware of. Mating disruption is our
7 primary building block for our control process for codling
8 moth and the two forms of leaf growers that we fight here in
9 the Northwest. I don't know where we'd be if we didn't have
10 this as a part of our control process.

11 I also must give my support, as stated in my
12 written comments, for the motion to remove the DL-methionine
13 annotation and for its continued relisting on the national
14 list for livestock production. This is a very good example
15 of the NOSB process at work. And while it did not
16 accomplish everything that it was meant to -- in fact, it
17 was a full outright disaster, but at least it shows how the
18 process is intended to be applied and the search for viable
19 solutions or middle-of-the-road agreements or alternatives
20 must be considered. But in this case, the attempt at our
21 finding a viable solution caused irreconcilable harm to the
22 flocks, and now it's time for you to fix our problem and our
23 mistake. Thank you.

24 BOARD MEMBER SMITH: Thanks, Harold. I see a
25 question from Nate Lewis.

1 BOARD MEMBER LEWIS: Yeah. I had two questions
2 for you, Harold. One about methionine. Do you think the
3 removal of the annotation will disincentivize seeking out
4 natural alternatives to methionine?

5 MR. AUSTIN: You know, Nate, I don't think so. I
6 think if we look at the materials that are currently listed,
7 those that have had the nonorganic sources in them as well
8 as organic. I think we've got a very resilient group of
9 stakeholders in our organic community. And when there's a
10 viable organic solution that's available for them, our
11 stakeholders are going to take and go that direction. But
12 until we get to that point, we really need to take and keep
13 this one listed and available for the livestock producers
14 until they can come up with a solution. We thought by
15 putting the annotation on, it would help move us that
16 direction, but the damage that this was causing to the birds
17 and the flocks and stuff, and then not being able to put the
18 right amount and feed at the right time was really
19 detrimental to those livestock producers. And it's time to
20 correct that mistake that we made and put a little trust and
21 faith in these producers. When there's something that's
22 viable -- a good, safe alternative for them and their
23 flocks, they'll switch. I don't have any doubt in the
24 world.

25 BOARD MEMBER LEWIS: Okay. Thank you. And then

1 just to pivot onto the pear ester petition and kairomones in
2 general. I think we're learning a lot about semantics in
3 terms of what the difference between a pheromone is and a
4 kairomone, whether it's a mating disruption or an
5 attractant, and we're sort of solving those details. But
6 one of the topics was whether we should consider listing
7 kairomones as a general class of substances, rather than the
8 one pear ester that's petitioned, and the nuts and bolts of
9 that are something that we're going to work on at the Crop
10 Subcommittee, but I'm curious if there are kairomones, other
11 than pear esters which are used, or might be used, if
12 there's any benefit to having a broad class allowance for
13 kairomones like we have for pheromones in the tree fruit
14 industry?

15 MR. AUSTIN: Nate, honestly, I don't know the
16 answer to that question. I'm cognizant of the one that's
17 utilized for the Tr c products, but if there's additional
18 need for that to be a general listing, I don't know. Maybe
19 some of the certifiers that register these materials would
20 have a better feel for that. Maybe OMRI or WSDA might have
21 a better grasp on that. That one, I don't really have a
22 good answer for you.

23 BOARD MEMBER LEWIS: Okay. But, I mean, as a
24 tree fruit grower, there's nothing in the conventional
25 toolbox that would be considered a kairomone that you're not

1 being allowed to use in organic right now. It's the pear
2 ester is the substance.

3 MR. AUSTIN: Yeah. Pear ester is the primary
4 focus at this moment, yeah.

5 BOARD MEMBER LEWIS: Okay. Great. Thank you.

6 MR. AUSTIN: You're welcome.

7 BOARD MEMBER SMITH: Any other questions for
8 Harold? Hey, Harold, thanks for your time today.

9 MR. AUSTIN: Thanks, guys.

10 BOARD MEMBER SMITH: Up next, we have Kate
11 Mendenhall. And then after Kate, there are some -- the next
12 ones up, which I believe we haven't found yet -- so Carl
13 Block, Trevor Gruber, and Ben Keller. That's who's coming
14 up next here after Kate. So if you are here, please make
15 yourself known. Or if anybody in the gallery here knows
16 them, you can shoot a text or something. That's who's up
17 next after Kate. Otherwise, like I said, I'll do a sweep at
18 the very end of the day so you can communicate that message
19 out as well. Sorry, Kate, for the PSA there. Name and
20 affiliation, and you can get started.

21 MS. MENDENHALL: Thank you. No problem, Kyla.
22 Thank you, LSE members, for the opportunity to speak before
23 you today. My name is Kate Mendenhall. I'm the executive
24 director of the Organic Farmers Association. OSA was
25 created by farmers for farmers. Without domestic organic

1 farmers, we do not have an organic market. Farmer viability
2 and domestic fair market expansion that works to build
3 competition in uplift communities is essential to the
4 organic program. I appreciate the NOSB discussion documents
5 on residue testing, risk-based certification, and
6 consistency in organic seed use. Action on these areas is
7 urgently needed.

8 As you know, and I appreciate the work that Amy
9 and Nate have done on this topic, organic grain farmers are
10 really suffering with record low grain prices and influx of
11 imported questionable organic grains. Organic dairy farmers
12 continue to undergo hardship without an adequate safety net
13 and are stymied by continued market consolidation. And
14 produce farmers are feeling increasing market heat from new
15 organic hydroponic production sold with the same label but
16 not the same soil. OSA agrees that residue testing on high-
17 risk product loads has merit, especially when these loads
18 are coming from other countries where NOP oversight is not
19 as stringent. We need to ensure that domestic producers are
20 competing in an equitable market under uniform standards.
21 Residue testing helps protect organic integrity in these
22 cases, but should not become the norm as organic is a
23 production-based system and should remain so.

24 While Dr. Tucker has repeatedly assured the
25 organic community that SOE is not intended to impact low-

1 risk small to medium-sized farmers, that is not what is
2 happening on the ground. We believe the NOP and their
3 accreditation managers need to have a more active role in
4 defining and explaining proper and intended implementation
5 of risk assessment procedures needed to help stop fraud
6 prevention without disproportionately burdening small
7 farmers. NOP must issue clear guidance on how risk
8 assessment will be done, how to define or determine low risk
9 and high risk, and shift the larger part of the oversight to
10 high-risk operations. Certification protocols for low-risk
11 operations should be reevaluated as the past five years have
12 opened accessible technologies that can greatly reduce small
13 farm paperwork burdens.

14 Another issue that makes the previously mentioned
15 solutions even more urgent, is that for the second time in
16 the last two years, organic grain farmers have received claw
17 back letters after another grain buyer declared bankruptcy.
18 From the information we have, which is about half of the
19 farmers affected, more than \$5.5 million has been clawed
20 back from farmers in seven Midwest states. OSA is working
21 to support these farmers in the short term and to organize
22 for a policy solution in the long term. It will take a
23 group effort to prevent this injustice in the future.

24 I urge you to keep organic farmer stakeholders at
25 the forefront of your thinking as you make decisions at the

1 NOSB meeting that have real impact in their day-to-day
2 operations. We have to move the organic market forward
3 sustainably and continue to do right by the farmers that
4 built the movement. It will take bold moves from the NOP,
5 rapid rulemaking efforts, and commitment from certification
6 agencies to implement increased scrutiny on high-risk
7 operations (audio interruption) for organic certification.
8 Thank you for your time and service.

9 BOARD MEMBER SMITH: Thanks, Kate. Questions for
10 Kate? Go ahead, Amy.

11 SECRETARY BURCH: Kate, hi. Thanks for coming
12 today and thanks for all your written comments. Appreciate
13 the support on the residue testing and just elevating farmer
14 concerns. It is challenging time.

15 One of your comments was really interesting in
16 the written ones. It talked about every farm operation
17 deserves a safety net when the market doesn't work. And you
18 were particularly pointing to, I believe, dairy in that
19 example that you gave. You highlighted grain farms. You
20 highlighted produce. Is there any immediate actions that we
21 can collectively as a community focus in on to build
22 reprieve for domestic producers and the market challenges
23 they're facing? It's bearish this year and next year's
24 forecast looks pretty bearish as well. So is there any
25 immediate actions that you're aware of that we can be doing?

1 MS. MENDENHALL: I guess it depends on our
2 definition of "immediate," but we do have a farm bill coming
3 up and there are quite a few solutions that would improve
4 the safety net for farmers in that farm bill. There's a lot
5 of crop insurance marker bills that address some solutions
6 that would improve through the return for farmers and the
7 protections. And then also, there's some new data required
8 that would provide the risk management agency to better
9 accommodate organic dairy farmers when there's times of
10 market stress. So both of those would be really helpful.

11 And then, you know, another market issue right
12 now that we're dealing with pretty heavily in the Midwest is
13 bankruptcy claw back letters. And that can just really hit
14 a farm really hard. We're looking at farmers who are losing
15 half of their income from 2022 being clawed back. And so a
16 policy solution for that just, you know, look at the
17 bankruptcy code perhaps so that farmers and ranchers could
18 be excluded from that for claw back letters because they're
19 participating in their ordinary course of business as
20 they're selling and delivering grain and receiving payment
21 for that.

22 So there's a number of things we could do, like
23 not maybe right snap right now, but I think that looking at
24 those types of farmer safety nets and looking for better
25 solutions to support farmers would be would make a real help

1 in the, you know, in the short term next few years.

2 BOARD MEMBER SMITH: Thank you, Kate. Anybody
3 else? Maybe I have one. Okay. If you could wave your like
4 magic risk-based certification wand and like design it, like
5 what's your -- what's your ideal? What does it look like
6 that would benefit low and medium-risk producers, as well as
7 certifiers? Don't forget about us.

8 MS. MENDENHALL: No, I don't. I think it has to
9 be sustainable for certifiers, too. I know certifiers are
10 working so hard to implement SOE in a way that makes sense
11 for their producers, but also to comply with the
12 expectations of the NOP. And I think that that line is
13 really tricky right now. So I do think some more guidance
14 and support from NOP so that certifiers feel really secure
15 in the way that they're defining that and looking at risk is
16 important. I think that -- well, we're -- we're starting at
17 OFA, a farmer working group, to really like dive into this.
18 So I think we will have some more clear guidance. I think
19 there are some things to think about as we're looking at
20 risk. I think it's really important to look at risk and
21 certification. I think it's important to use certification
22 agency staff capacity and resources where it's most needed
23 to protect the integrity of the label.

24 I know that we tested out different things during
25 the pandemic that maybe could be brought forward for low-

1 risk operations, like maybe if the farm -- a small to mid-
2 sized farm is doing a really good job on their certification
3 and there's not really risks that are coming forward, maybe
4 they do a Zoom inspection every other year or every two
5 years. That would save a lot of money from farmers. I know
6 that, you know, most of my small farm bill for inspection is
7 transportation. And this year my inspection will happen
8 when I don't even have any animals on the field. There's
9 going to be very little for them to actually see. It's
10 probably not going to be that -- that more informative for
11 an inspector to come to my farm than if we were doing a Zoom
12 inspection, and it will definitely save me a lot of money.

13 I think there's little things like that. And
14 then the type of records and scrutiny that we're asking,
15 based on what that farm's market is. There's just things
16 that small farms -- it's not really that relevant to their
17 operations to be providing the same type of records that
18 really complex supply chains really need to be providing,
19 and where we should be putting that staff time when you're
20 reviewing and looking through the inspection. But stay
21 tuned.

22 BOARD MEMBER SMITH: Yeah.

23 MS. MENDENHELL: I'm happy to share our farmer
24 working group comes out with because they always have great
25 ideas.

1 BOARD MEMBER SMITH: Yeah. I'm looking forward
2 to that feedback. Keep us posted. Appreciate it.

3 Okay. Thanks, Kate. I don't see any other
4 hands.

5 Okay. Do we have Carl Block or Trevor Gruber or
6 Ben Keller?

7 MS. ARSENAULT: Looks like those students are
8 still not on the call at this moment. One more on the
9 phone.

10 BOARD MEMBER SMITH: Okay. Okay. Rebekah Weber,
11 are you here?

12 MS. WEBER: I am.

13 BOARD MEMBER SMITH: Awesome. Okay. So we'll
14 have Rebekah, and then we're going to take a break. And
15 then, after the break, we'll be starting with Harry Rice and
16 then Eric Klein. And so, again, if anybody has contact with
17 Carl Block, Trevor Gruber, or Ben Keller, you can reach out
18 to them and tell them to join towards the end of the day.
19 And if they're here at the end of the day, we will do --
20 we'll get them in at the end of today. Rebekah, you can
21 state your name and affiliation and then get started.

22 MS. WEBER: Thank you. Hi, everyone. Thank you,
23 NOSB, for the opportunity to comment. My name is Rebekah
24 Weber, and I'm the policy director at California Certified
25 Organic Farmers, CCOF. And my comment is actually quite

1 timely after the discussion with Kate around what can we be
2 doing now in this moment to support the organic community.
3 I'm really focusing today on the Farm Bill. And while I
4 understand this isn't a direct topic that NOSB is
5 discussing, it is particularly timely in this moment. And
6 there are threats and opportunities that come with it.

7 I want to call attention to the fact that we
8 don't have a Farm Bill currently. And without one, there
9 are crucial farmer backbone programs like Cost Share that
10 are in jeopardy. But there's also a big opportunity this
11 time around. And that is to make permanent the
12 unprecedented \$300 million that USDA has invested in organic
13 agriculture. We do not want that investment in organic
14 market development, organic technical assistance, and
15 organic mentorship to be a one-off. CCOF really appreciates
16 the leadership of many on this call for pushing to codify
17 these programs in the Farm Bill. And whether Congress acts
18 during the lame duck session after the election or next
19 year, I look forward to connecting next week in Portland to
20 continue to strategize with everyone within the organic
21 community on how we can leverage our strengths and advance
22 organic agriculture in the Farm Bill. Thank you so much.

23 BOARD MEMBER SMITH: Short and sweet there. Any
24 questions for Rebekah?

25 Okay. I think that we are going to a break now.

1 Rebekah, thanks for your comments today. And we will take a
2 break until -- for 15 minutes. So 51, wherever -- whatever
3 the front end of that, but 51. See you in a bit.

4 (Recessed at 1:36 p.m.; reconvened at 1:51 p.m.)

5 BOARD MEMBER SMITH: And so I believe we will get
6 started here. I see a couple board members. People are
7 back with their organic coffee and chocolate. We will start
8 with Harry Rice and then, the next couple of speakers I also
9 have been told are not present. So after Harry would be
10 Eric Klein, and then Joel Layman and then Tess Barr, all of
11 whom I am told are not here yet. So, again, if you are
12 here, please make yourself known. Oh, I hear that Tess is
13 here now. So if anybody knows Eric Klein and Joel Layman,
14 they are up next after Harry. So, Harry, you can get
15 started, name and affiliation.

16 MR. RICE: Yup. Thank you. My name is Harry
17 Rice and I am with the Global Organization for EPA and DHA
18 Omega-3s, or GOED for short, which represents the worldwide
19 industry for EPA and DHA, the primary long-chain Omega-3
20 fatty acids found in fish oil. Our membership of 200-plus
21 members and partners is built on a quality standard
22 unparalleled in the market, and our mission is to increase
23 consumption of EPA and DHA to ensure that our members
24 produce quality products that consumers can trust.

25 While GOED's written comments address both fish

1 oil and nutrient vitamins and minerals as part of the 2026
2 Sunset Review, at the present time I will limit my comments
3 to fish oil. As we have done since 2015, GOED supports the
4 inclusion of fish oil in the 7 CFR 205.606, nonorganically
5 produced agricultural products allowed as ingredients in or
6 on processed products labeled as organic. Because the NOP
7 does not have production standards for aquaculture, fish,
8 and thus fish oil, cannot be commercially available as
9 organic. Since organic fish oil does not exist, consumers
10 who prefer organic products should have access to those
11 products made with nonorganically produced fish oil.

12 During previous Sunset Reviews, sustainability
13 has been the most contentious issue regarding the inclusion
14 of fish oil on the national list. We are disappointed that
15 the NOP chose not to act upon NOSB's 2021 recommendation to
16 modify the fish oil annotation. GOED and its member
17 companies who supply the category support sustainable
18 fishing practices, and we viewed a modification to the fish
19 oil annotation as an acceptable solution to address
20 sustainability concerns and to ensure that fish oil is
21 compatible with organic practices.

22 In the NOSB's October 24 Proposals and Discussion
23 Documents, the Handling Subcommittee asked stakeholders if
24 the NOSB should prioritize completing a recommendation for
25 wild seafood standards pursuant to the OFPA. My answer was

1 and remains yes, but in the interim, GOED encourages the
2 NOSB to vote no to remove fish oil from the national list,
3 so that fish oil can continue to be used in products labeled
4 as organic.

5 You may recall from my written comments that
6 because I was unable to find the Canadian annotation for
7 fish oil used in aquaculture, that I was unable to answer
8 the questions to stakeholders about whether or not the NOSB
9 should consider updating the 2021 recommendation to align
10 the fish oil annotation with the Canadian annotation for
11 fish oil used in aquaculture. I would be happy to answer
12 that question if you could read me the Canadian annotation.

13 In conclusion, GOED encourages the NOSB to vote
14 no to remove fish oil from the national list. By voting no,
15 fish oil will remain on the national list for another five
16 years. And just in closing, in the future, please feel free
17 to contact GOED with any questions related to fish oil or
18 any other EPA DHA-rich product. As always, thank you for
19 your time.

20 BOARD MEMBER SMITH: Thanks, Harry. We had a
21 little timer snafu, so thanks for being timely without the
22 timer. You have a question from Nate.

23 BORD MEMBER LEWIS: Hi, Harry. Thanks for your
24 comment. Do you have a sense of which oil is sourced from
25 wild-caught fish versus farmed fish?

1 MR. RICE: I do. That's a good question, I
2 should be able to answer it, but I can't. Sorry, you're
3 talking about the oil that's --

4 BOARD MEMBER LEWIS: The oil, yeah.

5 MR. RICE: The oil.

6 BOARD MEMBER LEWIS: The products that are
7 currently used in organic products, yeah.

8 MR. RICE: Yeah. I don't think that any of the
9 oil that's used in organic products is farmed from farm
10 fish.

11 BOARD MEMBER LEWIS: Okay. So then, is there a
12 logical extension to draw here that you all would support
13 working on a wild-caught fish standard so there could be
14 organic fish oil available on the market?

15 MR. RICE: Absolutely.

16 BOARD MEMBER LEWIS: Okay. Thank you.

17 BOARD MEMBER SMITH: Any other questions for
18 Harry? Okay. Thanks, Harry.

19 MR. RICE: Yup, thank you.

20 BOARD MEMBER SMITH: All right. So do we have
21 Eric Klein or Joel Layman? Okay. If not, then Tess, I see
22 you on the screen. You can get started. Don't forget to
23 state your name and affiliation, please.

24 MS. BARR: Okay. Can you hear me okay. Okay.
25 Hello, my name's Tess Barr, and I'm the president and co-

1 founder of Bright Pharma Caps. I'd like to recognize and
2 thank the National Organic Standards Board for allowing us a
3 voice in these proceedings. I don't think I need to educate
4 you on pullulan, but this information is available on our
5 website at www.brightpharmacaps.com in great detail. But
6 allow me to provide you some history on Bright Pharma Caps.

7 In 2006, we released for sale a patented pullulan
8 two-piece hard shell capsule. pullulan has been widely used
9 for a food ingredient in Japan since the 1940s. It has some
10 unique benefits for a capsule. They're very durable, run
11 well in manufacturing, and protect ingredients, unlike
12 capsules made with other ingredients. But this capsule,
13 like other pullulan capsules on the market, could only use
14 the coin [sic] made with organic. So in 2013, after several
15 years of research and constructing our dedicated organic
16 facilities and equipment, we released the world's first
17 organic certified capsule, again made with pullulan.

18 A legal dispute removed these capsules from the
19 market in 2015. It was at this time we built a facility and
20 developed the production of our own organic pullulan to make
21 organic capsules to ensure our quality control and supply of
22 the necessary material to make these organic capsules.

23 In 2020, as agreed, we returned to the United
24 States market. This started rapid growth for our company,
25 as we are still the only option to get the USDA seal on an

1 encapsulated product. Because of this growth and our belief
2 in this capsule, we built a second manufacturing plant to
3 produce organic pullulan. This last year, our sales grew 40
4 percent. We expect that to continue. Our current
5 manufacturing capacity is 5 billion capsules, and our future
6 manufacturing capacity is as much as 14 billion.

7 As still the only manufacturer of organic
8 certified capsules, we have real concerns with organic
9 equivalency granted to the ES-EU, allowing products using
10 the chemical-based HPMC capsules the use of the USDA organic
11 seal. We believe this is unfair to us and the U.S.
12 marketplace, and it is also misleading to the consumer. And
13 I'd like to thank you for your time and, again, for letting
14 us have a voice in these proceedings. Thank you.

15 BOARD MEMBER SMITH: Thanks for your comments,
16 Tess. I see a question from Kim. Hi.

17 BOARD MEMBER HUSEMAN: Hi, Tess. Thank you so
18 much for your comments today. This was not something that
19 was on my radar until the spring when we presented it for
20 its first round of Sunset review. Can you please go over,
21 again, your capacity currently and expanded capacity, and
22 then maybe give us a little bit more detail on where your
23 facilities are located and any concerns with logistical
24 constraints pushing the products into the market space?

25 MS. BARR: Sure. Currently, we -- our capacity

1 is 5 billion capsules, and we have future growth expected at
2 14 billion capsules. We are in China -- based in China. We
3 have our facility. We have six buildings on site. We
4 provide housing and dormitories for our employees, we -- so
5 that in case of -- let's say, let's just make COVID an
6 example. We were able to quarantine our employees, and they
7 stayed in the dorms and lived there. And we also have our
8 own water treatment plant facility. So we are able to treat
9 the water, and we're very sustainable. We give that water
10 back to the farmers so they can water the crops.

11 MR. BARR: Okay. Can we talk about supply line.

12 MS. BARR: Sure.

13 MR. BARR: Yeah. On the supply line, we have --
14 we ship to four different ports, and we have six warehouses
15 in North America. Right now, we have probably 35 containers
16 on the water. So we manage plenty of inventory for the
17 growth. We've had continued growth. If we don't have the
18 capsules at one warehouse, we can ship from another
19 warehouse. We're getting new customers every week, and
20 everything's run real smooth. We've been at the marketing
21 out of China over 15 years, and we have it down very well.

22 MS. BARR: Thank you.

23 MR. BARR: Our only issue is if somebody puts
24 some additional tariffs on.

25 MS. BARR: Tariffs are tough.

1 MR. BARR: But we don't need to go there.

2 MS. BARR: Not in our authority to control the
3 tariffs.

4 BOARD MEMBER SMITH: All right. Allison.

5 MS. JOHNSON: Thank you. Thanks for being here.
6 This is an interesting development for this material. I'm
7 going to ask basically Kim's question, but more bluntly. Do
8 you think you can supply the entire organic market's demand
9 right now? And secondarily, if we pulled the annotation
10 off, would that essentially give you a monopoly, or would it
11 introduce the opportunity for more producers to compete with
12 you in this ingredient production?

13 MS. BARR: We welcome competition.

14 MR. BARR: We've always welcomed other people to
15 do it. We've actually tried to help some people -- offered
16 our help to people. We've always had the belief if you
17 build a McDonald's across from a Wendy's, they both do
18 better. And we've had issues in the past of being -- having
19 a single supplier of some of what we do. That's one of the
20 reasons we built our own two plants for pullulan. But we
21 think we can offer enough for everybody. I think with
22 what's being used in nonorganic, we could offer it in
23 organic as well. There really doesn't have to be a big cost
24 savings. It really isn't that way. You know, to go
25 nonorganic doesn't save you that much money, especially when

1 you look at how many capsules go on. We're open to more
2 sales, and I think we can handle whatever's out there.

3 MS. BARR: We're also open to competition. So...

4 BOARD MEMBER JOHNSON: Great. Thanks for being
5 here.

6 MS. BARR: Thank you.

7 BOARD MEMBER SMITH: Sir, can you state your name
8 for the record as well?

9 MR. BARR: I'm Patrick Barr.

10 BOARD MEMBER SMITH: Thank you.

11 MR. BARR: Tess's husband.

12 BOARD MEMBER SMITH: Gotcha.

13 MR. BARR: I'm the U.S. sales director. I'm the
14 director of sales.

15 BOARD MEMBER SMITH: Okay. Just wanted to make
16 sure we had it --

17 MR. BARR: I'll be in Portland on the 22nd.

18 BOARD MEMBER SMITH: Okay. Great. Any other
19 questions?

20 MS. BARR: You know, just really wanted to thank
21 you for allowing us to have a voice in the proceedings.
22 Really appreciate it.

23 MR. BARR: I brought up this issue about EU
24 equivalency before. When I get a chance to speak to an
25 audience like this, I really would hope something could be

1 done about that. It's really not fair.

2 BOARD MEMBER SMITH: Thank you for the
3 perspective. Okay. Thanks for your time today.

4 MR. BARR: Thank you.

5 BOARD MEMBER SMITH: Yupper. Okay. Sorry.
6 Okay. So next we have Ryan Klassen, then Emily Musgrave,
7 and Rusty Olson. We are running about 15 minutes ahead of
8 schedule, you all. So if people who have later time
9 slots -- again, make sure if you know people, tell them that
10 we're running about 15 minutes ahead of time.

11 Okay. Ryan, name and affiliation, and you can
12 get started.

13 MR. KLASSEN: My name is Ryan Klassen. I'm an
14 organic row crop farmer from Minnesota. I grew up on a
15 conventional farm. I left for college and spent the better
16 part of a decade working for a logistics and material
17 handling company. I returned to the farm, and it's now an
18 organic operation. And I'm a problem solver through those
19 experiences. So if everyone has a pen, paper, or pencil,
20 please write down the four Cs, in case you haven't heard of
21 them. And that's the four Cs: condition, cause,
22 correction, and confirmation. And I'll say it again:
23 condition, cause, correction, confirmation. Why the four
24 Cs, you might ask?

25 I grow corn, soybeans, wheat, and oats. And in

1 my ten-year career on the farm as an organic farmer now, I
2 can tell you that it has been a roller coaster, as far as
3 marketing and being able to do what I do and make it almost
4 turnkey go for both the farmer, the buyer, and the consumer
5 or the end user. A year ago, I got a phone call that said,
6 buckle up, it's going to be a rough ride, from one of my
7 buyers. And a year ago, the prices are now lower -- a year
8 ago and today -- than they've ever been in my ten-year
9 career -- meaning, it's not sustainable, the path that it's
10 on right now. It is full of fraud.

11 So everybody was like, SOE is going to fix this.
12 So just wait for SOE to roll out. SOE has been out for six
13 months now. The prices are worse now than they were six
14 months ago, and they're even worse than they were a year
15 ago. What is going on and how are we going to fix this?
16 There's fraud everywhere in the supply chain. Why is the
17 USDA with the top program throwing millions of dollars and
18 transitioning more acreage and getting more producers on
19 board in a marketplace that's full of fraud and full of
20 grain [sic]? It's not a recipe for success. How are we
21 going to fix this? That is my question.

22 BOARD MEMBER SMITH: Thanks for your comments,
23 Ryan. Any questions for Ryan? I see one from Amy.

24 SECRETARY BRUCH: Ryan, thank you for taking time
25 out of your harvest schedule, I'm assuming, this time of

1 year in the Midwest, to join us to convey those words. You
2 mentioned you're a problem solver. Where should we look?
3 Where should we focus? Where should we target to try to
4 mitigate some of what you're experiencing?

5 MR. KLASSEN: Can we get the NOP to get some
6 transparency on SOE? I mean, I remember the deputy
7 administrator six months ago unveiling it and being very
8 proud and being like, this is going to solve all of your
9 paper versus electronic import problems that you had and
10 some of the fraud that's happened in the past -- but there's
11 no names. There's no amounts. There's no -- it's just
12 happening. And she did say, well, new information brings
13 new problems. And I can appreciate that, but the USDA has
14 an AMS service, and we know the pricing of what's going on.
15 Through customs and borders patrol, we know assigned values
16 for all commodities that are moved. You can do the math
17 backwards, but it's not available to you and I, and the
18 people walking down the sidewalk, or the ones in the field
19 that are growing it.

20 There's no -- there's no transparency in what's
21 actually going on. All this information is very hidden or
22 six months delayed, a month delayed, when it should be live.

23 BOARD MEMBER SMITH: Thank you, Ryan. Kim?

24 BOARD MEMBER HUSEMAN: Hi, Ryan. Thank you so
25 much for your comments. I really appreciate them. I'm

1 going to segue just a little bit away from this. First off,
2 I don't know if you're in your harvest season or where you
3 are in Minnesota to understand that, but I really appreciate
4 you being here because it is a busy time of the year for all
5 farmers. My first question is around your crop rotation.
6 You said your corn, beans, oats, and wheat. Do you
7 entertain other organic crops into your rotation or can you
8 speak to why those are the four crops that you're growing
9 currently?

10 MR. KLASSEN: Oh, that's a fantastic question. I
11 like that one. Having spent almost a decade in Minneapolis,
12 I knew quite a few people that were supportive of the
13 organic movement and, that's Farm to Table. Everybody loves
14 that local part of it, right? And the whole organic
15 industry is going through growing pains, right? And so when
16 one person has a hiccup or a ripple in their business model,
17 it affects more than just one person. It affects upstream,
18 downstream, and all the way to the farmer and to the point
19 that it's no longer a product on the consumer's table.

20 I've taken rye and gone to a bakery, did that,
21 couldn't get paid. Why? Because the bakery is going
22 through insolvency. I've taken sunflowers, and that person
23 didn't have the funds to pay for that on time. And
24 everybody is trying to get ahead while digging themselves a
25 deeper hole, in a sense. And it's a supply chain on a local

1 problem.

2 So I've dabbled in a lot of the peas. There is
3 only one domestic pea buyer in the States, and they've got a
4 record of, you know, not paying their farmers and a whole
5 bunch of people that have some choice words for them. So
6 between peas and sunflowers and rye -- I've done buckwheat.
7 All the specialty crops, very high risk, no safety nets.
8 And as a younger farmer, I can't expose or afford to
9 continue in those avenues. So I've had to go the corn,
10 soybeans, and wheat route. Oats is kind of fun, but Mother
11 Nature determines the test weight on that, and Canada wins
12 every time, and I can appreciate that. So that's why I grow
13 what I grow, if that answers your question.

14 BOARD MEMBER HUSEMAN: It does, and it kind of
15 leads into my second question, which -- thank you for that
16 background, because I understand the struggles with a lot of
17 the specialty organic ingredients, which the market wants
18 but doesn't want to appreciate. So my second question would
19 be, when we talk about risk mitigation and price discovery,
20 can you speak to the correlation to the conventional
21 partners and some of the mitigation tools, like the Chicago
22 Board of Trade, and speak to the spreads of organic to
23 conventional and what that's done over the past year to two
24 years?

25 MR. KLASSEN: Oh, that's a fun question as well.

1 Okay. It's a little bit out of my territory, because I
2 don't have a lot of background in the conventional market,
3 other than I know it's a broken model. Because you can be
4 sitting at your desk, having never stepped foot on a farm,
5 you can buy and sell corn and soybeans on paper.

6 BOARD MEMBER HUSEMAN: Okay. So maybe a better
7 or easier way to answer that or to ask that would be, have
8 you seen any -- your buyers or where you're going to your
9 elevators, and when you're mapping out your cost structure
10 and trying to decide, am I going to keep this farm organic,
11 and you compare it against your conventional products, do
12 you see a tightening or a widening between those two,
13 organic corn to conventional corn, sway to sway?

14 MR. KLASSEN: Yes. It's very much tightened and
15 shrunk. When I first got into this two -- or ten years ago,
16 corn and soybeans, we'll just take the two easy ones here,
17 were always two to two-and-a-half times of what a
18 conventional was. So corn is \$3. Conventionally, organic
19 is six, seven, or eight, and vice versa if you change those
20 numbers. We're no longer at two-and-a-half. We're no
21 longer at two. In fact, I believe the USDA now has a
22 formula. It's like 1.7 or 1.8 for corn. And you can do
23 that math through how the organic crop price of insurance is
24 set, as far as the safety nets that are there, if that
25 answers your question.

1 BOARD MEMBER HUSEMAN: That's exactly what I was
2 looking for. Thank you, Ryan. And thank you, Kyla, for
3 letting us have this conversation to absorb some of that 15
4 minutes of extra time.

5 BOARD MEMBER SMITH: Yeah. You're lucky about
6 these no-shows. Kidding. Thanks, Ryan. Appreciate it.
7 Okay. Up next we have Emily Musgrave, then Rusty Olson,
8 then I believe Lee Morberg and Paul Hoffman were next, but
9 those two are also perhaps not with us. So I'll call their
10 names. But Emily, and then Rusty are the two that are next.
11 So, Emily, name and affiliation, and then you can get
12 started.

13 MS. MUSGRAVE: Sound check. Can you hear me
14 okay?

15 BOARD MEMBER SMITH: You're a little quiet for
16 me, actually. Can you try again?

17 MS. MUSGRAVE: Is that better?

18 BOARD MEMBER SMITH: That is better. Thank you.

19 MS. MUSGRAVE: All right. Good afternoon. My
20 name is Emily Musgrave. I'm the organic regulatory manager
21 at Driscoll's. As always, I would like to thank the NOSB
22 for their tremendous commitment by serving on the board. My
23 comments focus on the continued allowance of various crop
24 materials, as well as two discussion documents and a
25 proposal on compost production.

1 Additionally, I'm a voluntary member of the
2 International Fresh Produce Association Organics Committee,
3 and Driscoll supports the comments made by IFPA. Driscoll
4 supports the continued listing of hydrogen peroxide for use
5 in organic production as both an algaecide, disinfectant,
6 and sanitizer, as well as plant disease control. Hydrogen
7 peroxide is widely used by Driscoll's growers for cleaning
8 irrigation lines. Driscoll supports the continued listing
9 of horticultural oils for use in organic production, as they
10 are a critical tool for the organic industry as a whole.

11 Driscoll supports the continued listing of
12 pheromones as an approved material on the National Organic
13 List as a tool for insect management. Pheromones are the
14 primary way organic growers control many different species
15 of moths. Driscoll supports the continued listing of ferric
16 phosphate in organic production. Many growers use ferric
17 phosphate as slug and snail damage is prevalent across all
18 four berry types, and in my garden as well. Driscoll
19 supports the continued listing of potassium bicarbonate in
20 organic production. Potassium bicarbonate is used as a
21 foliar fungicide to control powdery mildew across all four
22 berry types, but it's extremely important in strawberries.

23 Driscoll supports the continued listing of
24 magnesium sulfate as an approved material on the National
25 Organic List. Magnesium fertilization is critical to plant

1 health across all berry types. We also support the new
2 definition and practice standards for compostables, but
3 believe there needs to be more progress on biodegradable
4 biobased cultures. Driscoll also appreciates and recognizes
5 the importance of the discussion document of residue testing
6 for global supply chain as consumer trust in the integrity
7 of organic products is critical to the continued success of
8 the organic industry. We look forward to providing further
9 comments on this subject at the spring 2025 meeting.

10 Driscoll would like to thank the board for their
11 work and the discussion document on risk-based
12 certification. The industry absolutely needs risk-based
13 certification. Risk-based certification will increase
14 efficiency and capacity for organic operations, organic
15 certification bodies, and the organic community. Driscoll
16 respectfully requests we receive the materials for the
17 meeting further in advance of the public comment. I know
18 the board is extremely busy trying to get through all the
19 materials and get them out to the community members, but if
20 there's any way to get us the materials earlier before the
21 meeting, that would be greatly appreciated. Driscoll thanks
22 the National Organic Standards Board for the opportunity to
23 comment and their commitment to protecting the integrity of
24 the program.

25 BOARD MEMBER SMITH: Thanks, Emily. Any

1 questions for Emily? I don't see any. Thanks, Emily, for
2 your comments today.

3 MS. MUSGRAVE: Thank you.

4 BOARD MEMBER SMITH: Up next is Rusty Olson, then
5 Lee Morberg if they're here, Paul Hoffman if they're here,
6 and then Hugh Karreman would be after. Rusty, name and
7 affiliation, and you can get started.

8 BOARD MEMBER SMITH: You are muted. You are
9 muted.

10 MR. OLSON: How about now?

11 BOARD MEMBER SMITH: You're good.

12 MR. OLSON: All right. Sorry about that. I'll
13 start over. Rusty Olson. I farm in north central Iowa near
14 Garner, Iowa, and we farm organic, as well as conventional,
15 about 50-50. We farm about 1,450 acres total, and we're
16 half organic, half conventional. And got into organics
17 around 2016, 2017, started working on this, and it's been a
18 great experience. Much like Ryan, I think him and I spoke
19 before actually, much like Ryan, was great starting out.
20 The risk versus reward factor was definitely a lot stronger
21 a few years ago than it is now. And with the degrading
22 grain markets and everything that's going on with the
23 imports and the lack of integrity in the industry with the
24 imported grain coming in, my frustration is when you look at
25 the numbers of international production versus domestic, and

1 then you look at their acres, and then you look at the
2 amount of bushels we're bringing in, the numbers, they just
3 don't match. I wish I could run my operation that way. We
4 don't do that. I guess we have a little more pride and
5 integrity in what we do. So that's where I get frustrated.

6 But I guess the topics I'd really like to talk
7 about is one that -- but then, the issues -- I know it was
8 brought up, I was actually a victim of the claw backs with
9 the global processing here recently, like several others.

10 I've been involved with Iowa Corn Growers -- excuse me, Iowa
11 Farm Bureau for 22 years. I served on the county board and
12 several state committees. I worked with a lot of grassroots
13 level development policy -- helping develop policy for
14 agriculture and farmers in the State of Iowa, as well as the
15 United States, and I currently serve as a board director for
16 the state Iowa Corn Board.

17 And we get to work with a lot of legislative
18 activities and developing policy for farmers again through
19 Iowa Corn. It's been a great experience. Recently,
20 discovered the OFA for organics, a great group. I really
21 enjoy getting involved in that as much as I possibly can.
22 But, once again, getting back to the claw back thing, with
23 all these different organizations I've worked through, when
24 I got that letter about the bushels that I delivered and was
25 paid for and they were trying to take my money back, my

1 first thought was, this is theft. This should be absolutely
2 illegal. And then, you know, I started talking to
3 attorneys, well, this is bankruptcy law. We can't do
4 anything about it. This is just standard business, you
5 know.

6 There has to be a way to develop policy to make
7 this so they can't -- I mean, this was grain that we
8 produced and delivered and was paid for. And the grain is
9 no longer in our possession. And for them to come back and
10 try to take that money back, it should absolutely be a
11 crime. And there has to be a way to make exclusions. You
12 know, indemnity -- the funds have run out and they can't
13 cover these bills. They would like to, but they can't. And
14 I fortunately fell under the 30-day normal course of
15 business and I got excluded from that completely.

16 So my time must be up. So I guess saying that, I
17 really hope we can work toward taking care of this. And
18 there has to be a way to develop policy for this. So I see
19 I'm out of time. Thank you.

20 BOARD MEMBER SMITH: Thanks, Rusty. Any
21 questions for Rusty? Okay. I thought I saw Amy looking for
22 her hand and then I was like --

23 MS. ARSENAULT: Amy does have a question, but
24 can't get to her view hand.

25 BOARD MEMBER SMITH: Yes, I thought I saw that.

1 I saw her looking and I was waiting. Go ahead, Amy.

2 SECRETARY BRUCH: Yeah. Thank you, Kyla. Rusty,
3 thanks for your time today. I apologize for the reasons
4 that you're here today. That's very unfortunate, especially
5 the claw back that you mentioned.

6 When Ryan spoke, he mentioned about the
7 tightening of the markets, the delta between conventional
8 and the organic prices. You mentioned about risk. And now
9 we hear about the claw backs and the market uncertainty when
10 you do deliver grain. Can you talk about the strength of
11 additional buyers? I mean, this is the second bankruptcy in
12 a couple years that Midwest producers have experienced.
13 What's the forecast here? Is it shaky, do you think, going
14 forward?

15 MR. OLSON: Well, yes, I have that concern. I,
16 actually, fortunately, get to communicate with a lot of
17 different organic farmers. When I got into this, there was
18 no platform for organics on Facebook that I could find.
19 And -- excuse me, I'm getting a phone call. I've got to
20 send it to voicemail here or something, so hopefully I don't
21 cut anyone off.

22 Okay. Am I still here? Okay. Great. Sorry, I
23 had to take care of that. You can still hear me. Anyway,
24 so through that Facebook -- I started a Facebook page,
25 because I couldn't find one on organics, a real crop

1 Facebook page, and developed a lot of friends. And it's
2 been great to talk to these people, and everyone talks about
3 the security of the markets and the grain buyers and the
4 integrity of these different grain buyers. And we're
5 fortunate there's a handful that are pretty solid. Like you
6 said, you mentioned the two that went down were both pretty
7 solid organizations at one point in their operations, and it
8 is very concerning to the point where you almost want to ask
9 for a balance sheet before you sell any one grain anymore.
10 It's definitely a concern.

11 You know, when you sell organic grain, they have
12 30 days, and they like to take their 30 days right out to
13 the max before they write you out a check, whereas if you're
14 selling to Cargill or any -- on the conventional market,
15 they pay within the week typically. So I really -- they
16 need to enforce those grain merchant laws harder, that these
17 people are paying within a timely fashion. But yes, I get
18 very concerned about the ability of these companies to stay
19 in business. If we deliver grain, we hold up our end of the
20 contract. Are they going to hold up their end of the
21 contract and actually pay us? You know, it's a major
22 concern in a smaller market. And, yeah, it's definitely a
23 concern. Everything's tight margins, and we're seeing lower
24 numbers in the prices, and it's really questioning, are we
25 doing the right thing? We feel like we're doing the right

1 thing by staying organic, but for the -- you know, I have a
2 family to raise; I have a farm to maintain; I own a lot of
3 farmland; I got a lot of bills to pay; I got, you know, farm
4 payments, mortgage payments, machinery payments, just like
5 everybody else, and we have to do what's best for the bottom
6 line of our operation.

7 We'd love to stay organic, but it has to be
8 profitable year in and year out. A business has to be
9 profitable. Just because we're farmers doesn't mean we're
10 not supposed to make money. It's a funny little -- some
11 people think that farmers just farm and don't worry about
12 numbers. It's kind of strange.

13 SECRETARY BRUCH: Thanks for your insight, Rusty.
14 Interesting.

15 BOARD MEMBER SMITH: Interesting. I don't see
16 any other questions. Oh, wait. No, sorry. We are only
17 taking questions from board members. Sorry. I saw someone
18 raise their hand, but it was not from a board member.
19 Sorry. Thanks for your time. Appreciate it.

20 MR. OLSON: Thank you.

21 BOARD MEMBER SMITH: Okay. I think we don't have
22 Lee Morberg or Paul Hoffman. Again, we'll sweep at the end
23 of the day, so if you know those folks and can let them know
24 that if they would like to speak, to join at the end of the
25 day.

1 And then next up is Hugh Karreman, then Abby
2 Youngblood. I think Bryce Irlbeck is missing. And then
3 Justin Raikes. Hugh, are you with us?

4 MR. KARREMAN: Yup. Hi.

5 BOARD MEMBER SMITH: Great. Name and
6 affiliation, and then you can get started.

7 MR. KARREMAN: All right. Let me get my Word
8 document up here, if I may.

9 BOARD MEMBER SMITH: Yup.

10 MR. KARREMAN: You all set?

11 BOARD MEMBER SMITH: Yup, go ahead.

12 MR. KARREMAN: All right. Good evening, board.
13 It's nice to be at an NOSB meeting again, even in this way.
14 I was on the board in 2005-2010, and I was chair of
15 livestock committee from -- I don't know, 2007-10. We had
16 the grazing wars. We had the aquaculture issues, some big
17 ones. And anyway, I'm here today to talk with you about
18 Meloxicam, a pain reliever for livestock. And I've heard
19 there are some folks that want to have a technical review
20 for Meloxicam, and it's actually honestly not needed because
21 the FDA has already reviewed, evaluated, and approved
22 Meloxicam, and it has a new drug approval, Number 20-938.
23 And so there is actually a precedent for not doing a
24 technical review on a drug.

25 For instance, when Fenbendazole was being

1 evaluated by NOSB, we evaluated all the same documents that
2 FDA did, and we voted to allow it to be acceptable to the
3 NOP. And if you did a technical review on Meloxicam,
4 there's actually nothing new that would be shown. And also,
5 I do believe that once all these seven essential criteria
6 for materials review of stay with an OFPA are fulfilled,
7 then the NOSB has done its job in a material review.

8 And as far as the annotation, I think if you have
9 simply doubled the withholding time, that's all that's
10 needed. There's precedent for that as well under
11 Butorphanol, Xylazine, Tolazoline, and Flunixin. They're
12 all recommended by the NOSB to the NOP. And then as
13 regulations require, the NOP must confer with the FDA. And
14 so with any drugs in the United States, the FDA has final
15 say. The FDA had their say. They said what the
16 withholdings would be for those four drugs I just mentioned.
17 And then, the USDA, through the NOP, said basically, we're
18 going to double it for organic production. And so I would
19 let the FDA and the USDA talk, you know, legal terms
20 hopefully once Meloxicam is recommended.

21 And a pain relief drug like Meloxicam is not like
22 a food coloring item being considered for 605 or 606. Pain
23 relief and relieving pain and suffering is an ethical issue.
24 Both farmers and veterinarians want to provide pain relief
25 as needed and not be hobbled as they already are in life-

1 threatening illnesses due to the prohibition on antibiotics.
2 I can imagine that if organic customers pay lots of money to
3 have their pets worked on by a veterinarian, I imagine that
4 they would completely expect that a farmer would give their
5 livestock animals the same treatment in regards at least to
6 pain relief. And after all, animal welfare is the second
7 highest priority of organic customers.

8 To inhibit veterinarians from using FDA-approved
9 pain relievers won't play well with the organic customers.
10 Inhibiting the use of proven pain relievers really does come
11 close to the complete prohibition of using antibiotics. So,
12 in closing, please recommend Meloxicam to be allowed for
13 organic livestock on 7 CFR 205-603, please.

14 BOARD MEMBER SMITH: Thanks for your comments,
15 Hugh. Any questions for Hugh? If not, I have one. Okay.
16 Allison, go ahead.

17 BOARD MEMBER JOHNSON: Thanks for being here,
18 Hugh. It's really helpful to hear from you. My experience
19 with FDA's oversight of animal drugs is in the antibiotics
20 realm where they're really falling down of oversight of
21 antibiotics in conventional livestock production. So I'm
22 curious why you feel so confident in their review of this
23 particular drug.

24 MR. KARREMAN: I'm as confident as I would be in
25 their review of any drug, to be honest. We can -- it would

1 be thorough. It would be full. I know that if I wanted to
2 get a drug approved, let's say, you know, a natural drug
3 approved at the FDA level, Allison, that it would take
4 millions of dollars. And those companies that submit, you
5 know, an approval, whether it's an antibiotic or pain
6 reliever or a cardiologic-type drug, you know, they are --
7 those things are raked over the coals. And whether you and
8 I agree with the methodology FDA does, that's totally an
9 acceptable question.

10 What I think happens is that in the antibiotic
11 world in conventional, it is how those drugs are then used
12 in the conventional industry, which, of course, led to the
13 prohibition in the organic industry. So I'm not sure -- if
14 you want to be more specific about the FDA approval. It has
15 its flaws, but it also rakes things over the coals. It
16 really does.

17 The Fenbendazole papers that I read when I was
18 chair, I think it was about 99 pages, very detailed, getting
19 into toxicology, the whole thing. And, you know, I don't
20 know how more to answer you, I'm sorry -- because there are
21 problems, but there are -- that's the official gold
22 standard, if you will, of the U.S. And I might not love
23 FDA, but they exist, and USDA has to play with the FDA.

24 BOARD MEMBER SMITH: Thanks, Hugh. I see a
25 question from Nate.

1 CHAIR POWELL-PALM: Thanks, Hugh, both for your
2 service to the NOSB, but also for highlighting the ethics
3 that come into this material use. I think we often don't
4 hear enough from the veterinary community and folks
5 highlighting what we're really talking about here. These
6 are sentient beings' lives that we're in charge of
7 stewarding, and I couldn't agree more, as you said, that
8 consumers expect this. I'll just throw out there that I,
9 too, am very grateful that the FDA exists, and that we have
10 a very strong process for drug review. Thank you again for
11 your comments.

12 MR. KARREMAN: Thank you.

13 BOARD MEMBER SMITH: I did have a question as
14 well, Hugh. So my understanding is that the alternative
15 that's currently listed that is most widely used is
16 Flunixin. Is that correct?

17 MR. KARREMAN: That's correct. That would be --
18 well, I mean, for pain relief, Kyla, there's Flunixin and
19 there's Butorphanol. That's a synthetic opioid. There's
20 aspirin. That's on 7 CFR 205-603. Let's see. What else?
21 There's Lidocaine. So what it comes down to is basically
22 the duration or the length of duration of action. So
23 Lidocaine -- let's say it's disbudding, because I know
24 that's the big thing for getting Meloxicam on. Although, I
25 want to say, it should not be limited to just disbudding. I

1 amputated one of the two toes off a yearling bull recently,
2 and I used Meloxicam every other day for, I don't know, like
3 ten days, something like that. The nice thing about
4 Meloxicam is the length of duration. Like I just said, you
5 can use it every other day.

6 And any livestock farmer that milks more than
7 one, two, or three cows, and most of the commercial organic
8 guys are going to have 40, 100 or more, don't want to have
9 to deal with the animal to relieve pain. They want to do
10 that, but they don't have to give it every six hours,
11 whatever it is, and that would be aspirin or Flunixin or
12 Butorphanol. So it's a duration of length of action.
13 That's what it really comes to. Plus, honestly, Flunixin is
14 more for visceral pain, more in the abdomen or fever pain
15 and inflammation. Meloxicam, as it's used in humans too, is
16 more for osteoarthritic pain, so that if you're disbudding
17 the horns of an animal or something like that, it's more
18 indicated for that use.

19 BOARD MEMBER SMITH: Thanks. That was going to
20 be sort of my question, was just the comparison. I saw some
21 of that in your written comments, and I think there are
22 several comments around trying to restrict and limit the use
23 by species, also age, and also use. And so I was getting
24 the sense then, also from comments, though, that Meloxicam
25 is the preferred or better -- I don't know if that's

1 accurate -- but anyway, maybe preferred drug here because of
2 what you are describing. And so I just was like, yeah,
3 trying to get a little bit more information about how those
4 two drugs compare. And Flunixin currently isn't restricted
5 by species of animal or use or age of animal. And so if
6 that's already being used and we're not restricting it in
7 that way, and then Meloxicam is being petitioned, and
8 Flunixin is the most comparable material, I'm sort of
9 wondering, like why are we trying to do that? And I don't
10 know if you have any thoughts around that.

11 MR. KARREMAN: Mainly for duration of action.
12 And again, I wouldn't limit it to one species. I mean, you
13 know, there are organic sheep, there are organic pigs, less
14 than organic dairy, less than organic beef probably. But
15 it's really -- again, it's more of an osteoarthritic type
16 thing. So when I amputated that toe off the yearling bull
17 recently, I gave it Butorphanol, I gave it Xylazine,
18 Xylazine to drop it, Butorphanol for general analgesia. I
19 reversed it with Tolazoline. So right then and there,
20 that's all fine for organic. And then I gave it Flunixin
21 right away, IV, as it was waking up. And then I gave it
22 Meloxicam to extend it because I have a dairy farm. I have
23 50 cows. I milk. I mean, I do a lot of stuff, and I have
24 to go to this other place on the farm, and I want to keep an
25 eye on that yearling bull, but not intensively as I would

1 have if I had to give Butorphanol or Flunixin every bunch of
2 hours. It was every other day. And it really made a
3 difference for that animal. And that's what I'm about is
4 like individual animal care, you know. And I think that's
5 what the organic customer would want, too. So duration of
6 action is the reason for Meloxicam compared to Flunixin,
7 let's say.

8 BOARD MEMBER SMITH: Okay. And you haven't seen
9 any, like, negative impact on the other species of animals,
10 goats or anything like that, when using this material?

11 MR. KARREMAN: Let's see. I haven't used it in
12 pigs. I've probably used it in a few sheep. But, you know,
13 it's -- I haven't, no. I haven't, to answer your question.

14 BOARD MEMBER SMITH: Thank you. Any other
15 questions for Hugh? Thanks so much for your time today.

16 MR. KARREMAN: Thank you.

17 BOARD MEMBER SMITH: Okay. We have Abby
18 Youngblood. Then if we have Bryce Irlbeck, and then Justin
19 Raikes, and then Eric Falcon. Abby, name and affiliation,
20 and you can get started.

21 MS. YOUNGBLOOD: Thanks, Kyla. Good afternoon,
22 board members. My name is Abby Youngblood, and I'm the
23 executive director at the National Organic Coalition. And I
24 am going to comment on four topics: organic seed, residue
25 testing, NOSB support staff, and methionine. And I want to

1 start by thanking the CACS for taking up organic seed usage
2 as a work agenda item. We know that this issue isn't going
3 to be solved quickly. It's a topic that may take us a few
4 iterations to figure out a path forward. But we're
5 definitely grateful to the NOSB for creating space in the
6 public realm for the discussion to take place.

7 And I also want to invite members of the NOSB and
8 members of the public to the NOP pre-NOSB meeting on Monday,
9 October 21st in Portland. We are going to highlight some of
10 the challenges around organic seed during that meeting and
11 have a panel discussion with seed producers, breeders,
12 distributors, and policy experts. And we will also, as part
13 of that full-day meeting, have a farm bill update and a
14 farmer panel and more. And folks can register on the events
15 page of the National Organic Coalition website.

16 I want to comment next on residue testing. We
17 support residue testing in processed products. There are a
18 few considerations that we want to flag. First of all, as
19 has been said already today, organic certification is a
20 practice-based standard, so the testing is there to just
21 make sure those practices are being followed. We also need
22 to think about who's going to bear the cost of the testing.
23 We know that isolated testing at the handler level is not
24 highly effective, particularly for multi-ingredient
25 processed products. We'd like the NOSB to consider the

1 experience of the EU and, specifically, the process that's
2 being used by the EU Organic Farming Information System.
3 And lastly, we know that we need consistent implementation
4 by certifiers, and that means we need some clear guidance in
5 the NOC handbook.

6 Next, I want to comment on NOSB support staff.
7 NOSB would like to request that, going forward, the NOSB
8 indicate for each NOSB meeting what activities and
9 information have been provided by NOSB support staff. And
10 we also request that the NOSB put a process in place to make
11 it easier for NOSB members to make use of the support. And
12 the NOP should not be the gatekeeper, and documents produced
13 by NOSB support staff should be delivered directly to NOSB
14 members. So this is something we'd like the Policy
15 Development Subcommittee to work on.

16 On methionine, we oppose the proposal to remove
17 the methionine use limits. And then, finally, as you know,
18 we're deeply engaged in the farm bill process. In our
19 written comments, we have a specific request for the NOSB
20 related to the organic certification cost share program.
21 And I'd be happy to answer any questions on that. Thank you
22 so much.

23 BOARD MEMBER SMITH: Thanks, Abby. I see a
24 question from Nate.

25 BOARD MEMBER LEWIS: Thanks for your comment,

1 Abby. I had a question about the methionine annotation
2 change. And I seem to recall in your written comments that
3 you indicated there wasn't really enough time or awareness
4 about that being a potential annotation change proposal to
5 be voted on in the fall meeting. And I think my -- I have a
6 process question. Like, as we try to integrate more
7 annotation changes, which I will say many of our - we draw
8 from NOC's comments related to annotations in your Sunset
9 chart as we evaluate things, which is really great and a
10 really helpful roadmap for us. But as we sort of try to get
11 the annotation change at Sunset process right, what's the
12 best way to signal to the community that we are considering
13 an annotation change on a substance? So like we're all
14 going into the fall meeting like no one's getting, you know,
15 surprised by changes.

16 MS. YOUNGBLOOD: Yeah. Thanks so much for that
17 question. And we are appreciative of the board, like,
18 looking for those opportunities to make those annotation
19 changes that have been lingering out there. I know Steve
20 Ela is going to say thank you on iodine on the livestock
21 issue as well. You know, I would love to hear Steve Ela's
22 thoughts on this as well. I think our members rely a lot on
23 subcommittee notes to have a sense of what is going to be
24 dealt with at the next meeting. So I feel like having some
25 indication in those subcommittee notes that the issue is

1 going to be worked on or if the board knows at the Portland
2 meeting something that's going to come up in the spring for
3 that to be mentioned in the public meeting as well. I know
4 the board's already trying to do all of those things, but
5 sometimes it's just a little hard for everybody to stay on
6 the same page because it takes a while for subcommittee
7 notes to get to us; and that's the process we have in place
8 for communicating to the public. So Steve Ela may have
9 additional ideas on that.

10 BOARD MEMBER LEWIS: Okay. Great. Thanks. And
11 just to let you know, we are trying to get it right. So,
12 you know, let's, like, work together as a community so that
13 we're clear and above boards, and you don't need to know how
14 to navigate the NOSB website to get to those subcommittee
15 notes. I would love for it to be, like, very clear. Thank
16 you. Let's keep thinking constructively about that.

17 BOARD MEMBER SMITH: Thank you, Nate. Amy?

18 SECRETARY BRUCH: Thanks, Kyla. Abby, thanks for
19 your time today and NOC's written comments. I do have my
20 carryover question that I led into with Terry at the
21 beginning of the meeting for you, and she mentioned to ask a
22 member of NOC. So I was just going to say, you know, we
23 have a lot. We're doing a full court press. We have a lot
24 of items that the community -- NOSB community, and NOP are
25 working on to try to increase enforcement. I know we've

1 heard from a lot of farmers that that's one of the number
2 one concerns. I was wondering, in the community, do we have
3 efforts working on technology solutions? One previous
4 commenter mentioned about AI. Where is the new realm of
5 focus for innovation at in the organic community? How can
6 we leverage technology to, you know, increase bandwidth to
7 get after some of the concerns?

8 MS. YOUNGBLOOD: Thank you so much for that
9 question, Amy, and I will give as good an answer as I'm able
10 to. First of all, I'll just say that based on the ongoing
11 problem, and we've heard about it today on fraudulent
12 organic feed grain imports, we want to see the NOP double
13 down on testing of those imported feedstuffs, and NOC is
14 supporting legislation proposed by Senator Ricketts of
15 Nebraska called the Organic Import Verification Act. So
16 we've really appreciated working on that bill and hope that
17 that will be introduced soon. So, thank you, Amy. Thank
18 you, Nate. Thank you to some of the others who have been
19 working to our partners at Organic Farmers Association.

20 And I think that does kind of touch on your
21 question on technology because I could see some ways in
22 which we could really be honing in on risk using that kind
23 of data, the testing data, but also using some other new
24 data and information that's accessible to us through SOE,
25 for example, being able to flag countries that are high risk

1 or import certificates that are invalid to sort of across
2 certification agencies know where some of the problems are.
3 So I'm probably not the most well-versed in how to actualize
4 that, but I think we have a real opportunity to do that.
5 And I would also say we need to keep going in the direction
6 we've been going. We've doubled the resources for the
7 National Organic Program since 2018. The advocacy community
8 has worked on that. And I think we need to continue to make
9 sure that there's a staffing up there to, you know, do the
10 accreditation of certifiers, to do the enforcement actions,
11 to use real-time data to figure out where there's that
12 mismatch between yields and organic supply, so that we see
13 where the fraud is because it's moving around.

14 And we know, you know, I'll just say right now we
15 have a lapsed farm bill, a lapsed farm bill extension. And
16 one of the things that's caught up in that is money to
17 implement the organic trade and tracking system that's so
18 important for SOE. That's one of the so-called orphan
19 programs in the farm bill. So we're asking all organic
20 community members to pay attention to getting that funding
21 in place so that SOE can be implemented properly.

22 BOARD MEMBER SMITH: Thank you, Abby. Appreciate
23 your time.

24 I have a question for you, Abby. I saw in your
25 written comments mention about the EU as, like, a model.

1 And so you talked about that today as well. And I was,
2 anyway, talked to some folks in the certifier community
3 about that who do work in the EU. And so that's, yeah,
4 something that was, like, on my radar. But I didn't -- do
5 you have any, like, do you know, like, any cliff notes
6 versions of, like, a couple highlights of things that
7 they're doing? Like --

8 MS. YOUNGBLOOD: I can't give that to you right
9 now, but we do have that expertise within our coalition
10 membership. And I'd love to follow up and connect you to
11 some of the individuals who are really familiar with the
12 EU's organic farming information system and, like, how risk
13 is dealt with. Because we do have some coalition members
14 who are the person who can give you that cliff notes
15 version. So I'll follow up with you on that, Kyla.

16 BOARD MEMBER SMITH: Okay. Awesome. Thank you
17 so much. And then, also what -- just to get it on the
18 record, what do you want the board to do for a cost share?
19 What's the ask?

20 MS. YOUNGBLOOD: Yeah. Thank you for that. You
21 know, we are asking the board to kind of elevate this issue
22 with USDA leaders. So it's something we can be talking
23 about in Portland. I think just we want to make sure USDA
24 is going to Congress and saying this is a problem. And, of
25 course, the National Organic Program is within the

1 Agricultural Marketing Service at USDA. It's the Farm
2 Service Agency that runs the cost share program. But even
3 so, we'd like to see AMS and leaders within AMS making the
4 point, look, we're in trouble here. If we don't get that
5 funding for cost share, that is going to have a huge impact
6 in 2025, especially on producers who are -- you know, for
7 whom cost is a barrier. And we know that increasingly the
8 cost of certification is a barrier for a lot of producers.
9 So that may really affect who can move forward with getting
10 certified, if we don't get the funding in place.

11 BOARD MEMBER SMITH: Thanks, Abby. Thanks for
12 your comments today.

13 Next up we have Bryce Irlbeck, then Justin
14 Raikes, then Eric Balkan, but maybe they are not here. So
15 if you know Eric, please let them know that we are running a
16 bit ahead of schedule. Okay. Bryce, name and affiliation,
17 and you can get started.

18 MR. IRLBECK: Yeah, good afternoon. My name is
19 Bryce Irlbeck. I've spoken a few times in the past. But
20 I'm an organic producer and I also own a business that helps
21 farmers through the certification process. And I've really
22 come today to talk about one topic that's come up in our
23 farming operation, and that is the topic of testing and
24 certification process. And the parity that has been shown
25 by the data of U.S. testing versus testing abroad, with the

1 new rules implemented in the SOE, I can see that testing has
2 increased in the United States, as it should be, and that's
3 a good thing. And I was wondering, as we are being tested a
4 lot on surprise visits, I work on a lot of farmers, get a
5 few surprise visits every year, and the testing was being
6 done, which I thought was great. And there's a few things
7 that, at the end of this, I'll go through the testing that
8 could be better in the United States. And I wanted to see
9 what was being done abroad.

10 So I pulled from the government a FOIA request
11 where testing was being done abroad. And it came up 100
12 percent that no testing was being -- no surprise visits in
13 the data I pulled were being conducted abroad. A hundred
14 percent of them were being conducted in the United States.

15 So the next question I asked was, we're allowing
16 millions of bushels to come in, unvetted grain per the USDA
17 standards. And I started asking certifiers, why were we not
18 doing surprise inspection abroad? One of the quotes I'll
19 quote back to you is, we can't do it abroad. It's much too
20 expensive, when we can complete them in the United States
21 for the 5 percent. So we are doing an economics-based and
22 not a risk-based certification program. And we will be
23 digging into that over the next few months to see if there
24 are any certifiers actually doing abroad surprise
25 inspections and their inspection process. So that is one of

1 the things I want to talk about, and I'm continuing to pull
2 the data to figure out if we are doing that. And if we
3 aren't, we should let the consumer know that we're not
4 following the organic standards set by the U.S. government
5 for their own rules.

6 And I urge you, one of the asks is to push -- to
7 uphold the organic rules here and abroad, and understand
8 that there are no repercussions for cheating abroad as there
9 are in the United States. So we need to uphold these
10 standards. There's no going to prison in any of these other
11 countries if they are cheating. So the only thing we have
12 is to uphold the rules that we have in the United States.
13 We should do this through modern testing. We test on our
14 farm. They come out and test, and it's great. I like it.
15 There's effective tests that we could be doing across the
16 whole globe. And without creating a huge burden, just using
17 a little common sense.

18 One of the things that's simple is we ship corn
19 down to -- from Iowa to Arizona. We have trouble with bugs.
20 In the 14 hours it takes to get down to Arizona, we have to
21 put in refrigeration, get it to a tortilla plant, and get it
22 on there. How are we getting ships across the ocean without
23 using any type of bug control, and millions of bushels going
24 through humid climate zones that I think would fester bugs?
25 So how are we doing that? And so my ask is that we just

1 enforce the rules that are there, and we start doing that
2 across the board and globally.

3 BOARD MEMBER SMITH: Thank you, Bryce. Any
4 questions? I see one from Kim.

5 BOARD MEMBER HUSEMAN: Hi, Bryce.

6 MR. IRLBECK: Hi.

7 BOARD MEMBER HUSEMAN: I really appreciate the
8 comments that you've provided. Unless we talk about
9 testing -- it's such a broad topic -- can you narrow in and
10 expand a little bit on -- I know you mentioned bugs that are
11 either railed or trucked from the interior to destination
12 markets. But can you expand a little bit on what testing
13 procedures, high level, you're referencing?

14 MR. IRLBECK: Yeah. I mean, simple, fumigants.
15 There's no way these ships are crossing the ocean without
16 fumigants. Conventional can't do it. Organic, it's not
17 special grain. It's not making the trip without fumigants.
18 And we can't use fumigants in our bin. The way we learned
19 how this works is we have bugs in our bin. So we're
20 cleaning corn in the summer months monthly and moving it and
21 putting diatomaceous earth into it. And so fumigants, I
22 would say test for that. It is an easy one. It's going to
23 be in the whole ship. So easy one, one single test, test
24 for fumigants.

25 BOARD MEMBER SMITH: Thank you, Bryce. Anybody

1 else? I think I had a question. I'm sorry. You said you
2 pulled data from certifiers. Can you just repeat what you
3 were saying about the data that you pulled from certifiers?
4 And was it domestic certifiers that certify also
5 internationally? Or, like, what is the certifier data pool
6 of the data that you were looking at?

7 MR. IRLBECK: Yup. So it's certifiers that
8 certify domestic and abroad. And I wanted the government-
9 allowed access to who they did surprise inspections on. And
10 that was 100 percent U.S. organic growers in the data pool
11 that we have and zero percent anybody abroad.

12 BOARD MEMBER SMITH: Okay. But you weren't
13 looking at or didn't request data about certifiers that
14 certify only internationally, but to the NOP standard; is
15 that correct?

16 MR. IRLBECK: Yeah. So, obviously, I can't get
17 that certification through the U.S. government of somebody
18 that's not in the U.S.

19 BOARD MEMBER SMITH: Right. Yeah, yeah.

20 MR. IRLBECK: So only U.S. --

21 BOARD MEMBER SMITH: Oh, well, I mean, if they're
22 accredited by the NOP --

23 MR. IRLBECK: They're -- I haven't tried that
24 yet. I just did certifiers that are certifying globally --

25 BOARD MEMBER SMITH: Okay.

1 MR. IRLBECK: -- that are based in the U.S. So
2 we are pulling all that data.

3 BOARD MEMBER SMITH: Okay. Thanks.

4 MR. IRLBECK: Yup.

5 BOARD MEMBER SMITH: I'm sorry. I'm running this
6 show. Thanks for your -- I forgot. I forgot I have to go
7 to the next person. Thanks for your comments, Bryce. Do we
8 have Justin Raikes?

9 MR. RAIKES: Yeah.

10 BOARD MEMBER SMITH: Okay. Great. Hold on one
11 second, Justin. We then have Eric Balkan if they're here.
12 If not, we'll go to Dan Langager, and Abbie Corse if they're
13 here, and, if not, then Ehsan Toosi. So Justin, Eric, Dan,
14 Abbie, Ehsan. Justin, name and affiliation, please.

15 MR. RAIKES: Yeah. Hi. Thanks. I'm Justin
16 Raikes. I'm based in Ashland, Nebraska, a row crop. We've
17 been organic now for about five years. We're primarily
18 grains. We do some forage production. We do some food
19 grade stuff as well. And we do -- we have been seed
20 production in the past as well.

21 A couple of comments. One, there's been a lot of
22 good discussion on the state of the markets. And I would
23 agree with everything I've heard so far. I'd further second
24 Bryce's comments on risk-based testing. Two commentaries I
25 have for today: one, in support of risk-based testing, I

1 think that from a producer standpoint, we really need to
2 prioritize the areas of greatest impact for potential fraud.
3 In my mind, those are sales, meaning revenue and receipts,
4 whether it's from a producer like us or, you know, somebody
5 further up the value chain. And two would be prohibited
6 inputs. Those are the two easiest ones in my mind.

7 I don't feel like personally that our certifiers
8 necessarily prioritize those areas. Just in our own
9 experience, you know the thing that we're -- the
10 documents -- the committee documents for today asked about
11 areas of, you know, potential unanticipated risk. And I
12 would say the thing that we're always concerned about is
13 certifiers getting overly zealous on issues that are not
14 really core to certification.

15 For example, I've wasted a bunch of time going
16 back and forth with a certifier in the past on approved
17 substances -- in this case, micronutrient usage. They
18 didn't like exactly how I was doing it, even though what I
19 was doing was completely legitimate, versus mass balances
20 and sales and those sorts of things.

21 So I would say, I would second Bryce's comment.
22 I think that, you know, I'm sure from their perspective, the
23 economics favor them doing what is easy for them to pick on,
24 rather than what we should be prioritizing. And I would
25 fully support efforts to remedy that problem. I will point

1 out as well that many of us are already required to test for
2 prohibited substances. This year on the food grade side, we
3 have a huge new battery of prohibited substance tests where
4 everything we ship has got to be confirmed absent for all of
5 the very long list of prohibited substances before we even
6 make shipments. So it's something that's already happening.
7 And I think for a lot of us, it's the expected standard.
8 The bottom line is that we need to have testing and
9 enforcement match up with risk, like I said, primarily on
10 sales and prohibited inputs.

11 Secondarily, I'll speak to quickly, because we do
12 have some seed production experience. I know that there's a
13 discussion going on about increasing the organic seed
14 requirements or efforts to, let's say, improve organic seed
15 adoption. You know, that's not something I'm opposed to.
16 Again, I have some experience in it. We've produced, you
17 know, a number of self-pollinated seed crops, food grade and
18 otherwise. The timing on that, though, really could not be
19 worse from a market standpoint. We can't have these
20 functional markets and increase requirements on producers.
21 The net effect of that is going to be more people are going
22 to leave this program. And all the discussion, all the
23 effort to try to encourage new transitional acres and bring
24 people in are a waste of time. If the markets don't work,
25 then people are not going to stick it out. So I think it's

1 really just an argument in favor of the enforcement shift
2 that we're talking about here in a lot of different ways.
3 Thanks.

4 BOARD MEMBER SMITH: Thanks, Justin. I see a
5 question from Kim.

6 BOARD MEMBER HUSEMAN: Hi, Justin. I'm going to
7 ask you a question about this last topic we were speaking of
8 on seed -- organic seed, and your planning for your crops.
9 Now, we're speaking most specifically here about row crops,
10 acreage that is more sizable. But can you help me to better
11 understand, when do you determine your crop rotation plan,
12 your seed purchases, and how weather and other external
13 factors might alter those plans and seed availability?

14 MR. RAIKES: Yeah. Well, great question.
15 Thanks, Kim. And I would say that, like probably other
16 folks here on the producer side, we have plans that start at
17 A, B, and C, and sometimes end all the way in Z. So
18 sometimes the day before planting is when we're trying to
19 make a final adjustment. We try to be responsive to market
20 conditions. The last couple of years, that's been really
21 challenging because we don't necessarily know if our Plan A
22 is going to be remotely profitable or not. And so you've
23 got to be ready with B, C, and D.

24 And the other thing I would say is that, where
25 possible, we try to set this far in advance. You know,

1 where possible, particularly on, let's say, something like
2 the food grade side, I think any other producers on here
3 would probably say the same thing. If they know they're
4 going to do it, they're going to lock it in fairly far in
5 advance so, you know -- and then, working with some of the
6 bigger seed companies, it takes more time to track down a
7 specific variety and get it in a, let's say, a non-GMO, non-
8 treated format. That can be very difficult, depending on
9 where you're trying to go.

10 So, you know, there's a lot. We could talk way
11 longer about this subject, I think, than anyone really wants
12 to hear. But the bottom line is that, you know, there's
13 more variables, not less, being that it's organic. And so
14 sometimes what you don't want to necessarily do, especially
15 in the market environment that we're in right now, is get
16 stuck with something that doesn't really work very well for
17 you. And so I would say the more planning you do on that,
18 the better. And the more contingency planning you do on
19 that, the better. You know, having been on the seed
20 production side as well, the other issue is, and I fully
21 understand it, is the name of the game in the seed business
22 is inventory. And so if you don't have the inventory, you
23 can't make the sale. But if you have the inventory and it
24 doesn't sell, then you're screwed. You know, so that's the
25 number one kind of killer on that side of the house, too.

1 And so you're trying to, you know, pretty perfectly guess
2 what you think demand's going to be. And if, you know,
3 soybeans are going from, you know, 40 bucks to 21, and
4 you're -- a bunch of seed beans, you know, you have a
5 problem. And so, yeah, it's complex.

6 PI mean, obviously, as early as possible. But,
7 again, we got flooded twice this year. And so our plan A
8 changed, I don't know, four or five times. And, yeah, that
9 makes the seed procurement tough.

10 BOARD MEMBER HUSEMAN: Thank you for the cliff
11 note version on that, Justin. And that's food for thought
12 as we tackle this very heavy topic of seed and seed
13 availability. So thank you for your thoughts on it.

14 BOARD MEMBER SMITH: Don't go anywhere, Justin.
15 Amy has a question for you.

16 MR. RAIKES: Okay.

17 SECRETARY BRUCH: Thanks, Kyla. Justin, thanks
18 for your time today. I wanted to briefly mention about
19 buyer requirements and testing. Could you dive into that a
20 little bit further on your food grade crops? And who's
21 paying for that testing then at the end of the day?

22 MR. RAIKES: Yeah. Well, good question. We were
23 informed by our primary counterparty on the food grade side
24 this year, who I believe is speaking later in the comments
25 as well, about a substantial uptick in testing requirements

1 basically given to them by their certifier. I'll be honest,
2 I haven't even talked to them yet about who is paying for
3 it. I think I know the answer, which is me. So, yeah, it's
4 something that I don't think we're really necessarily
5 thrilled about. But, yeah, I mean, I think there's a full
6 battery of chemistry -- common chemistries, glyphosate,
7 2.4D, on down through fungicides, insecticides, all sorts of
8 stuff that we have to demonstrate an absence of, basically,
9 to be able to deliver it. So that's a newer one. We've had
10 that sort of some residue testing in the past, for sure.
11 But to have a really comprehensive battery is definitely a
12 new one this year. And to be clear, I'm not opposed to it.
13 I would have loved to not have to pay for it. But other
14 than that, I think it's, you know, the right direction.

15 SECRETARY BRUCH: Thanks Justin.

16 BOARD MEMBER SMITH: Thanks, Justin. That was
17 going to be a little bit of my question, too, was when you
18 had said you were being required to do a bunch of new
19 testing, that that was buyer driven.

20 MR. RAIKES: Yeah.

21 BOARD MEMBER SMITH: So I think, yeah, you
22 clarified that. So that was going to be my clarification.
23 Thanks. I don't see anymore hands. Thanks for your
24 comments today. Do we have Eric Balkan? I think maybe no.

25 Dan Langager.

1 MS. ARSENAULT: Dan is on the line with us.

2 BOARD MEMBER SMITH: Dan. Oh, I see you. Okay.
3 So we have Dan here. Abbie Corse, I think, joined us. Then
4 we have Ehsan Toosi. And then we will take a break. So,
5 Dan, Abbie, Ehsan, and then a break, Dan. Name and
6 affiliation, and you can get started.

7 MR. LANGAGER: Great, thanks. Hello, NOSB
8 members. My name is Dan Langager, and I manage organic
9 policy at the Northwest Horticultural Council. The NHC
10 represents the growers, packers, and shippers of apples,
11 pears, and sweet cherries grown in the Pacific Northwest.
12 And they produce the majority of our country's organic palm
13 fruit. Please refer to our extensive written comments for
14 the Pacific Northwest tree fruit industry's feedback on this
15 year's Sunset materials, as well as the inert ingredients
16 proposal, and the pear ester petition.

17 For the Sunset materials, I want to underscore
18 the importance of pheromones, horticultural oils, hydrogen
19 peroxide, potassium bicarbonate, magnesium sulfate, and
20 peracetic acid in tree fruit production and packing. In
21 particular, pheromones are really essential to tree fruit
22 production to help control pests that often pose a
23 significant threat, such as codling moth and leaf rollers.
24 Pheromone-based mating disruption is now the foundation of
25 apple and pear integrated pest management programs, enabling

1 growers to make fewer pesticide applications than would
2 otherwise be necessary. And, therefore, we strongly support
3 the petition to allow the semiochemical pear ester on the
4 national list.

5 Synthesized pear ester is structurally identical
6 to naturally occurring pear ester, is generally recognized
7 as safe for grass, it dissipates and degrades rapidly, has
8 low toxicity to humans and natural pest enemies, and
9 provides the capability to lure and trap both male and
10 female codling moth. Pear ester aligns with the principles
11 and goals of organics by decreasing the insecticide sprays
12 needed. These tools allow growers to pinpoint hot spots of
13 codling moth populations and then deploy measures only when
14 and where most needed. With pear ester disruption, tree
15 fruit growers can often treat as little as 10 percent of an
16 orchard and achieve good control of codling moth. The pear
17 ester-based products within this petition are considered by
18 many tree fruit growers to be the most effective codling
19 moth monitoring and mating disruption products on the market
20 today. And we support its addition to the national list.

21 On the inert ingredients issue, the Pacific
22 Northwest tree fruit industry supports option two, the EPA
23 list with restrictions and prohibitions. Of the two
24 options, option two provides a more efficient, effective,
25 and scientifically sound process for reviewing inert

1 ingredients over option one. Option two would maintain NOSB
2 control of national criteria that inert substances must
3 meet, including consistency with the organic principles,
4 while still recognizing the scientific expertise and
5 regulatory authority of the Environmental Protection Agency.
6 But with either option, inert ingredients allowed in
7 pheromone-type pesticides like the passive pheromone
8 dispensers must continue to be allowed in organic
9 production.

10 I want to give a big thank you to all the board
11 members as well as the NOP staff for all of your continuous
12 hard work, and thanks for this opportunity to provide input
13 from organic tree fruit growers and packers to the NOSB.

14 BOARD MEMBER SMITH: Thank you, Dan. Any
15 questions for Dan? I see one from Nate.

16 BOARD MEMBER LEWIS: I'm going to ask you, Dan,
17 the same question I asked Harold related to the pear esters
18 and whether you're aware of other kairomones that are either
19 in use or want to be in use in organic so we can kind of
20 wrestle with it. Is it just pear esters or is it the class
21 of kairomones that we should be thinking about?

22 MR. LANGAGER: Yeah. Thanks, Nate. I really
23 appreciate that line of thought. And kind of like Harold,
24 I'm not aware off the top of my head of any specific
25 kairomone-based products, other than this pear ester one.

1 But it's something I'll do some more digging into and get
2 back to you.

3 BOARD MEMBER SMITH: Any other questions?

4 Thanks, Dan. Appreciate your comments.

5 MR. LANGAGER: Thank you. See you next week.

6 BOARD MEMBER SMITH: Yup. Next we have, Abbie
7 Corse and then Ehsan Toosi. Abbie, welcome. Name and
8 affiliation and then you can get started.

9 MS. CORSE: Yes, good afternoon. Thank you so
10 much for having me. Abbie Corse, I co-own a small organic
11 dairy in Vermont. I'm here on behalf of the Cooperative
12 Organic Valley in support of adding Meloxicam to the
13 national list. We have a small organic grass-based dairy
14 and though we are currently, and have been for about eight
15 years, working on shifting our genetics to polled genetics
16 largely, I'm sure you've heard a number of reasons and
17 rationales behind why that takes -- I mean, like I said,
18 we're in year eight. We have about, I'd say, 80 percent of
19 our calves are born polled at this point. But for the
20 calves that are not, it is starting to feel really important
21 that there be another quick, easy, accessible, cost-
22 effective option that is available for helping with the
23 stress and pain that comes with that process of disbudding
24 the calves.

25 I think I'm starting to hear a lot more, both

1 from on the consumer side and then from other livestock
2 farmers that have potentially considered shifting to organic
3 farming, but are concerned about some of those, you know,
4 more hairy areas of animal welfare, and sort of where the
5 line is being drawn as to what is taking good care of the
6 animal and what is not -- you know, what is causing unneeded
7 stress or pain and what is not. And so I think that adding
8 something like this to the list could help in addressing --
9 you know, could help with some of those concerns that some
10 livestock and dairy farmers have in regards to shifting to
11 organic and that transition period and just, I think it
12 would be a helpful option.

13 I'm sorry. I'm trying to look at my -- oh, and
14 the other thing is that a lot of the other options have to
15 do with injections. And, of course, there are a lot of us
16 that are in fairly rural and remote locations. And if
17 you're not at a comfort level with giving injections -- and,
18 of course, that comes with more risk to the animal, I think
19 having an option like this in places where there are a
20 number of us that are facing increasing challenges to have
21 that access to care in an immediate setting. And so being
22 able to have this on the shelf as an accessible method of
23 pain management for our animals seems like a really crucial
24 component at this point. And that's actually all I have to
25 say, unless anybody has any questions. I know you guys are

1 about to break.

2 BOARD MEMBER SMITH: No, that's okay. Thanks for
3 joining us and for your comments. I see you do have a
4 question from Nate.

5 BOARD MEMBER LEWIS: It's a question I know the
6 answer to, but maybe not everyone on the board knows the
7 answer to.

8 MS. COURSE: Okay.

9 BOARD MEMBER LEWIS: So can you just tell the
10 board and the public what polled means?

11 MS. CORSE: Oh, yes. Apologies. So we've
12 been -- polled genetics is when -- is bringing back, if I
13 understand this correctly, the horned genetics that are
14 primarily predominant in Holstein animals, in the majority
15 of dairy animals in this country. The horns are recessive.
16 And so we're trying to bring back the dominant trait of
17 unpolled -- of polled genetics -- meaning that the cows are
18 born without horns, which is a wonderful option that takes
19 away the need to do any of those processes at all. And
20 we've had amazing luck with that, but the genetics and the
21 accessibility of those polled genetics are very tricky to
22 access and they're -- we have not focused on that in the
23 industry. And so for those of us that are trying to make
24 that transition to having a polled herd, it's possible, but
25 like I said, it's about, you know, a ten or 15-year process

1 and you have to be really careful about the inbreeding
2 potential of those genetics.

3 And so during that process of getting there, you
4 know, when you still have, for those three to five calves we
5 have a year that are born that way, you know, it would be
6 really nice to offer them some comfort in that regard.

7 BOARD MEMBER SMITH: Another question from Kim.

8 BOARD MEMBER HUSEMAN: This takes me back to my
9 college days. Not to quote a song, but to expand on
10 genetics and especially in the cattle industry, while you
11 are looking at not only the polled genetics, do you take
12 into account other statistics, such as birth weight, growth
13 weight, milking production, et cetera, as a holistic view
14 versus just this one particular aspect, or are you just
15 honing in on trying to find a solid polled genetic?

16 MS. CORSE: That is a great question. No, we are
17 trying to solve for a number of factors with the genetics,
18 which is, again, what makes it such a tricky and long
19 process. So within the polled genetics that we're searching
20 for, on our farm at least, we're searching for A2A2; we're
21 searching for, like you said, production, but high
22 components, so high fat, high protein; good feet; longevity.
23 You know, there's a whole range of things. And while for
24 us -- and, I guess I would say that there are -- in choosing
25 to pursue a polled herd, there are realities to that, right?

1 You do sacrifice, to a certain extent, some of those other
2 genetic priorities that you might be searching for in the
3 quest to get to the polled point.

4 There are good polled genetics, and there are
5 becoming more and more, but again, it's definitely a -- you
6 know, you're walking a line as to trying to get the right
7 genetics to keep your farm in business in the best way
8 possible with all of the various challenges.

9 BOARD MEMBER HUSEMAN: I get it. I've polled a
10 lot of heifers in my day because we were seeking something
11 in particular and realized it's a balance, so thank you for
12 your efforts.

13 MS. CORSE: Thank you.

14 BOARD MEMBER SMITH: I have one question for you
15 too, Abbie. I asked a previous commenter this as well, but
16 you said something that made me -- anyway, that I'll ask
17 this to you as well. So from my understanding, the most
18 comparable medicine or drug that's currently on the national
19 list that's allowed to be used in organic is Flunixin. The
20 brand name is Banamine, I believe. And so I was asking
21 about sort of the comparison between that material and this
22 material, and why this seems to be like the, quote,
23 preferred material by dairy producers and the vet community.
24 And so from the previous commenter, I had -- we had heard
25 about length of time, like length of action. And then I

1 heard you say that this is also just in a different form, so
2 a pill versus a shot. Are there any other reasons why this
3 might be -- like I'm making an assumption too -- like is
4 this the preferred material? And if so, why? Is it -- do
5 you want to add anything besides length of action and form?

6 MS. CORSE: I think that in case of any of these
7 things, you're trying to narrow it down to the item that has
8 the best possible outcome for all things. I think what I
9 would say is, yeah, my understanding of the Flunixin is that
10 it's injectable and pour-on, and so, you know, injections,
11 again, come with their own sets of kind of, you know, risk-
12 benefit analysis when you're just doing that as a farmer on
13 the farm. And the pour-on, I think there is some potential
14 for absorption by the people who are applying it, and wiggly
15 calves are a thing. So that seems like a very legitimate
16 component of that.

17 It's also -- my understanding is it's like a
18 bottle of 100 is about \$15. And, you know, with the rising
19 cost of everything, I think having a cost-effective method
20 that is really easy to administer is just -- it's such a
21 gift to -- again, on our farm, we basically -- you know, we
22 utilize as little as possible. But for those times when you
23 need something, it's nice to have that. And I do really
24 appreciate the fact that it, you know, it helps with that
25 pain relief for a longer period of time.

1 And what else should I say? And I think -- oh.
2 My understanding, too, is for the calves that its flavor is
3 such that they actually take it in quite easily. And so
4 they're not -- you know, you can tuck it in the side of
5 their mouth and they'll take it. And it's, again, not a
6 fight, which when dealing with squirmy bovines is a factor
7 we can all appreciate.

8 BOARD MEMBER SMITH: Awesome.

9 MS. CORSE: I hope that's helpful.

10 BOARD MEMBER SMITH: Thanks for joining -- yeah.
11 Thanks to you and your assistant in the background there for
12 joining us today, and servicing.

13 MS. CORSE: Yeah.

14 BOARD MEMBER SMITH: I mean, we've had all sorts
15 of people on our -- people and animals and all the things on
16 our Zoom cameras, so, yeah. Thank you so much.

17 MS. CORSE: Thank you.

18 BOARD MEMBER SMITH: Okay. Ehsan Toosi.
19 Hopefully, I'm saying that correctly.

20 MR. TOOSI: Very good.

21 BOARD MEMBER SMITH: Okay. I think we got you.
22 Name and affiliation, and your slides are there. Yup. And
23 then, name and affiliation, and you can get started.

24 MR. TOOSI: Good afternoon, everyone. Pleased to
25 be here. My name is Ehsan Toosi, and I'm director of

1 research and development at True Organic Products. First, I
2 would like to appreciate you, the members of the board, for
3 your commitment, but also for giving me the opportunity to
4 comment. My comment is actually a follow-up of our former
5 submissions earlier this year. And I have a couple of
6 slides.

7 Our request is to expand residue testing beyond
8 pesticides by including nutrient inputs, particularly
9 nitrogen. It's because we believe lack of authenticity
10 testing, for the most part, it penalizes and harms our
11 domestic organic growers. Just a few highlights of the
12 background of this issue. We know organic fraud can occur
13 at farm, but also during the supply chain. Certification is
14 essential, but is at the same time inadequate to ensure
15 authenticity of organic crops. There is currently no
16 established methodology for validating authenticity. Fraud
17 is more likely to happen in case of imported products,
18 especially from countries or regions where there is poor
19 transparency, jurisdiction, and farming or processing
20 technology. But also routine inspection by certifiers is
21 more difficult.

22 And our focus is nitrogen testing at this stage
23 because of limited sources of nitrogen in organic cropping
24 and also difficulty of nitrogen management in organic
25 farming, but also because of ease of nitrogen adulteration

1 with synthetic nitrogen sources. Also, because nitrogen
2 authenticity methodology has fairly developed.

3 Next slide, please. We've communicated with
4 commercial labs about this direction, and the feedback we've
5 received from them is that they like to see some level of
6 mandation prior to the S2 mark on developing authenticity
7 and methodology in packages. True Organic has been building
8 relationships with different stakeholders. We've been
9 working with academia, University of Wisconsin, and UC
10 Davis. We submitted actually two proposals this year to
11 USDA and CDFA, requesting funding to invest this issue and
12 also develop methodology. We've started working with AOC
13 International towards forming a committee, technical
14 committee for authenticity methodology. Again, focus would
15 be nitrogen at this stage. And we are working with
16 Eurofins, which is a global commercial lab, but also with UC
17 Davis Sustainable Organic Lab on developing authenticity
18 methodology. And we are trying to bring other stakeholders,
19 including CDFA, on board to join this joint effort. And our
20 hope is to add additional layer of trust and confidence of
21 consumers. Thank you.

22 BOARD MEMBER SMITH: Thank you so much. I see a
23 question for you from Brian.

24 BOARD MEMBER CALDWELL: Yeah, thanks, Ehsan. I'm
25 a little confused about testing for nitrogen. Are you

1 talking about testing for different isotopes of nitrogen, so
2 you can try to figure out whether they're originated from
3 the air or from the soil? Is that what the difference is
4 here?

5 MR. EHSAN TOOSI: I think when it comes to
6 nitrogen, there are some basic tests, like mineral forms of
7 nitrogen. Those are easy, but also I think the most
8 powerful tool that we have that it allows differentiated
9 sources of nitrogen. Of course, I'm referring to biobased,
10 what has been organic, basically, versus synthetic nitrogen.
11 Yes. Delta-N15, which is isotope of nitrogen.

12 BOARD MEMBER SMITH: Another question from Nate.

13 BOARD MEMBER LEWIS: Yeah. I think one of the
14 stumbling blocks that we encounter when we're dealing with
15 testing of inputs is that material manufacturers are sort
16 of -- they plug into the industry, but they're not overseen
17 by certifiers and the NOP per se. I realize there's CDFA
18 and OMRI and these other players. And so when we test
19 inputs under our current system, the impact is largely felt
20 by the growers because that's our regulatory mechanism. So
21 as true, do you have any sort of thoughts about how we can
22 sort of put that burden on the input manufacturers? What
23 are our regulatory mechanisms so that it's the input
24 manufacturers who feel the impact of their fraudulent
25 activities, not the growers who sort of unwittingly use

1 these products, which appear to be compliant?

2 MR. TOOSI: Sure. And, you know, it has -- I
3 would say there are two different aspects to that. One is
4 the input itself, where either farmer, you know, knows or
5 they unknowingly use that. And because we are in the
6 industry, we focus a lot on that because part of what we
7 bring is actually important and we have to be aware of that.
8 That's -- I would say that's an easier thing, you know,
9 especially when it comes to nitrogen. But when it goes --
10 when the input, whether it's synthetic or organic, goes
11 through the biological loop, which is basically crop
12 production in farm scale, it becomes more difficult, not in
13 terms of measurement, but in terms of because it goes
14 through multiple loops, it becomes harder to actually
15 interpret the result.

16 When it comes to fertilizer, it's much more easy
17 to cut it somewhere. Okay. This is synthetic, this
18 resembles, you know, biobased. But yes, we have to push
19 these two directions parallel together.

20 BOARD MEMBER SMITH: Logan?

21 BOARD MEMBER PETREY: Brian asked my question.
22 Thank you, Kyla.

23 BOARD MEMBER SMITH: Great. I think that is it.
24 Thanks for joining us today.

25 Okay. We are coming up on our break. But before

1 we do the break, let me announce the next couple of speakers
2 and then --

3 MS. ARSENAULT: Kyla, I'm sorry, can I interrupt?
4 I think, Nate, did you have a question? I saw you try to
5 talk for a minute.

6 BOARD MEMBER LEWIS: I just saw Amy.

7 MS. ARSENAULT: I'm sorry, Amy.

8 BOARD MEMBER SMITH: Oh, shoot. Sorry. Thank
9 you. I didn't see you. Ehsan, are you still here?

10 MR. TOOSI: Yes.

11 BOARD MEMBER SMITH: Okay. I'm sorry. I did not
12 see Amy raise her hand. She had a question for you. My
13 apologies, Amy.

14 SECRETARY BRUCH: Oh, no problem, Kyla. I'm
15 sorry I'm doing it the old-fashioned way for some reason, my
16 Zoom feature of the hand raise is not available to me. So,
17 thank you. Thanks, Nate, for catching me.

18 Ehsan, thanks for your time. I think you
19 highlighted a real important vulnerability on this nitrogen
20 testing. I saw your written comments on that, as well.
21 What is your confidence level? I know we went into great
22 detail when we were looking at ammonia extracts on isotope
23 testing and fraudulent activity that could be detected or
24 not detected with blended fertilizers. Where are we at, in
25 terms of advancement with testing on nitrogen? What's the

1 confidence level we can get to detect, you know, if there is
2 synthetic sources that are not approved to be used in
3 organic?

4 MR. TOOSI: Are we talking about the input or
5 about the crop?

6 SECRETARY BRUCH: About the crop, actually.

7 MR. TOOSI: About the crop.

8 SECRETARY BRUCH: Yeah.

9 MR. TOOSI: I think the crop -- the best tool, as
10 I mentioned, is stable isotope nitrogen, and we've been
11 working on that with UC Davis for a few years. But there
12 are a bunch of literature, you know, coming mostly from
13 European countries. The technology is there, so we can send
14 a sample to a lab and they give you a number. But I think
15 when it comes to the level of confidence that we want to
16 make a judgment, sometimes the values of nitrogen, N15
17 basically, is so low that no doubt, the crop has been
18 basically fertilized with synthetic nitrogen. There is no
19 doubt about that. And sometimes it's too high that,
20 obviously, it's been organic combined. But in some cases,
21 either it's been -- especially, if it's processed food, it's
22 been contaminated or it's been partially spiked with
23 nitrogen.

24 So a percentage of nitrogen comes from synthetic,
25 and that's what we call a gray zone. And that has to be --

1 that interpretation, whether it holds eventually organic or
2 it's a violation, I think, to some extent, it's crop
3 dependent because some crops, there are nitrogen fixtures,
4 obviously, but for most crops you can cut it somewhere. And
5 I know of a few literature that they have tried that
6 actually by Europeans, for example, for sunflower or some
7 oil seeds that they've done that. Usually, between two to
8 four, if I want to give you a value, it falls into that gray
9 area that it basically warrants further investigation --
10 with a high confidence, we would say.

11 SECRETARY BRUCH: Okay. So it sounds like there
12 could be a line of demarcation on intentional fraud with
13 sole source synthetic products of nitrogen.

14 MR. TOOSI: But I wanted to add also that we
15 submitted with a professor at UC Davis, Selina Wang. Her
16 background is food chemistry. And she's -- through this
17 proposal, she's working on identifying some compounds that
18 are available in organic products, crops, but are not in the
19 synthetic at very early stages of metabolism. And that can
20 go parallel to some, you know, stabilizing techniques.

21 SECRETARY BRUCH: Thanks a lot. Thanks for
22 highlighting some of the innovation. Appreciate it.

23 BOARD MEMBER SMITH: Thank you. Okay. I think
24 we're good now. Appreciate you coming back.

25 Okay. So we're going to move to a break. After

1 the break we have Adrienne Shelton, Rhodes Yepsen, and
2 Connie Karr. This is our last -- after the break -- it's
3 our last section of public commenters before we go on recess
4 for today. So I will -- I'm going to call the names that we
5 have missed, and I'll call them again. But I'm just going
6 to call them now in case, again, you know any of these folks
7 and wanted to reach out. So the sweep at the end of the day
8 so far will be Carl Block, Trevor Gruber, Ben Keller, Eric
9 Klein, Joel Layman, Lee Morberg, Paul Hoffman, and Eric
10 Balkan. So I'll call those in that order when we get to the
11 end of our last speaker, and if any of them are here, then
12 we can hear them speak. And again, if you know any of them,
13 please reach out. After the break, we'll be up with
14 Adrienne Shelton, Rhodes Yepsen, and Connie Karr, and we'll
15 come back at 50. Thanks.

16 (Recessed at 3:35 p.m.; reconvened at 3:50 p.m.)

17 SECRETARY BRUCH: Hi, ladies. Are you all set?

18 BOARD MEMBER SMITH: Thank you.

19 SECRETARY BRUCH: You are welcome.

20 BOARD MEMBER SMITH: Okay. Welcome back,
21 everybody. So prompt. We have Adrienne here with us, and
22 then after that, we'll have Rhodes Yepsen, and then Connie
23 Karr. Please state your name and affiliation, and then you
24 can start.

25 MS. SHELTON: Thanks, Kyla. My name is Adrienne

1 Shelton, and I'm the R&D manager for organics at Enza Zaden
2 and Vitalis Organic Seeds. Vitalis is the organic brand of
3 Enza Zaden, a vegetable breeding company based in the
4 Netherlands. Thank you for the opportunity to speak today
5 and for your many hours of hard work in supporting the
6 organic community.

7 Today I would like to provide comments on
8 organic seed usage, induced mutagenesis, and the use of CO2
9 in inhouse production. As an organic community, there is
10 strong consensus that organic seed should be the foundation
11 of organic production. As with product and input, organic
12 seed extends organic climate benefits from farm to seed to
13 farm to table. Organic seed is an issue of integrity, and
14 we risk consumer confidence in the USDA label by allowing
15 large quantities of conventional untreated seed in organic
16 production.

17 But the devil is in the details. We know that we
18 need to level the playing field so that producers have
19 realistic targets for organic seed usage. We need a system
20 that does not require certifiers to become experts on subtle
21 differences between varieties. And we need clear market
22 signals in order to stimulate investments from the seed
23 industry. So how do we achieve this?

24 At its core, we need a system that allows for
25 ongoing input from the three main stakeholders: producers,

1 certifiers, and seed suppliers. If we think of these
2 stakeholders as a three-legged stool, the stool is currently
3 very wobbly and will certainly not support growth in organic
4 seed usage. Fortunately, there are models in Europe that we
5 can look to, where collectively the EU has set a goal of 100
6 percent organic seed use by the end of 2036.

7 While the EU model has its own challenges and is
8 not fully transferable, the EU has taken definitive actions
9 in a way that we have not yet in the U.S. We can learn from
10 EU successes and mistakes to chart our own path forward with
11 a multi-faceted approach that is realistic and achievable.
12 What this model looks like is not totally clear yet, but for
13 sure it must include some basic tenets: a filter to narrow
14 down the crop segments that are subject to stronger seed use
15 requirements; a mechanism for input from all stakeholders
16 when determining the boundaries of these filters; and a
17 real-time seed availability database uploaded by suppliers
18 and managed by a third party to ensure neutrality and
19 confidence.

20 We need time to gather stakeholder input to
21 develop the strategy and ask the board and the NOP to
22 continue to put a spotlight on this topic in subsequent
23 meetings so that we can achieve this together.

24 Regarding IM, we believe this technique should
25 continue to be allowed for policy number 13-8.1. The most

1 effective way to keep untraceable genetic techniques out of
2 organic production is to first strengthen organic seed
3 usage, and then develop an organic seed code of ethics.

4 Finally -- and I think I'm going to run out of
5 time to tell you about our new greenhouse, but I'm happy to
6 answer questions.

7 BOARD MEMBER SMITH: Thanks so much for your
8 comments. I see a question from Kim.

9 BOARD MEMBER HUSEMAN: I'm just going to open the
10 floor back up to let you finish your statement on
11 greenhouses.

12 MS. SHELTON: Thanks, Kimberly. I was just going
13 to say that finally, we recently built a new greenhouse in
14 Holland for in-soil organic seed production. The greenhouse
15 is a model of sustainability with a fully circular system
16 that includes capturing CO2 from the heat source and feeding
17 it to the plants to increase seed quality and yields.
18 Without this mechanism, the CO2 would become a pollutant in
19 the atmosphere.

20 BOARD MEMBER HUSEMAN: Thank you very much.

21 BOARD MEMBER SMITH: Nate.

22 BOARD MEMBER LEWIS: I like your three-legged
23 stool model. And I would be curious to push that metaphor a
24 little farther, perhaps at risk of becoming unwieldy, but
25 there's another piece I'm curious about how -- like what

1 your thoughts are, in terms of bringing the handlers into
2 this equation about requiring organic seeds. So I'm from
3 Pacific Northwest, and we have a lot of frozen vegetables up
4 here. And the processor of that frozen vegetable is who
5 might own or certainly determines what varieties the growers
6 are utilizing. So the growers aren't looking at a seed
7 catalog. They're given the seed they need to grow for
8 frozen corn or whatever. And so I'm curious if you all have
9 any thoughts on that piece of the supply chain coming into
10 the fold and contributing to an organic seed future.

11 MS. SHELTON: Yeah. So that's a good question
12 and it's one I don't feel that I'm an expert on, by any
13 means. It does seem like the handler piece could be
14 addressed either through the organic system plan of the
15 producer. I know there's been discussions about is there a
16 way to include some element of requirements within an
17 organic handling plan. That seems more challenging to me.
18 But, yeah. I mean, in the end, I think it comes down to the
19 handler, of course, has to recognize what the requirements
20 are for their organic grower and producer. To me, it's
21 still -- the key players that are actually coming forward to
22 say, hey, this is what we need. Maybe it's from a grower
23 saying, hey, this is what our handler is asking for. We
24 need this seed in organic form.

25 To me, that's still the mechanism of this three-

1 legged stool to be able to say, okay, here's where we need
2 to putting our efforts into increasing seed supply, into
3 having clear requirements that are achievable based on
4 what's available from seed supply, what's doable from the
5 growers' side, what's feasible from the certifier
6 perspective. I think it still rests with the producer, in a
7 sense.

8 BOARD MEMBER SMITH: Amy. And your hand is
9 working. Look at that. Magic. On the break.

10 SECRETARY BRUCH: Amazing what a restart will do
11 for you. Anyway, thanks, Kyla.

12 Adrienne, thanks so much for your time. I wanted
13 to unpackage one of your comments. And then I have a
14 follow-up on the Europe standards that you mentioned. But
15 one of the comments I saw in the written, and I believe you
16 just said it in your oral comments as well, was currently
17 growers supporting organic seed for philosophical reasons
18 are at a competitive disadvantage compared to those who
19 choose not to use organic seed. And I was just wanting you
20 to unpackage a little bit more what that competitive
21 disadvantage is in your words. And then I have a follow-up.

22 MS. SHELTON: Well, I think because the loopholes
23 for not using organic seed are so large, it's not that
24 challenging for a producer to make an argument that is fully
25 aligned with the current regulations as to why they're

1 choosing a conventional option versus organic. And so what
2 that means is that in the end, and it really comes down to a
3 grower choosing to seek out and use organic seeds, because
4 it's not that challenging to not use organic seeds.

5 And so what we see is that within the more
6 competitive markets, and by the more competitive markets on
7 a price scale, so generally growers that are maybe selling
8 to the wholesale market where the margins are very thin,
9 maybe they're getting really strong push from the wholesaler
10 to really get their price lowered. Every penny counts,
11 right? And so for them to say, well, we really believe that
12 organic food should start with organic seed, so we're also
13 going to add organic seed as an input, then they're now at a
14 disadvantage from another wholesale producer who can,
15 without too much challenge, make a very legitimate or legal
16 argument as to why they're not using organic seed. So
17 that's what I meant by that. Does that clarify that?

18 SECRETARY BRUCH: Yeah, that's helpful. Thanks,
19 Adrienne. And I was hoping you could shed some light on the
20 EU. You mentioned their rule and their goals for 2026
21 hitting 100 percent organic seed. I know they're globally
22 based towards different products as well; that Europe
23 doesn't produce all of the goods organically that they need.
24 I know they're looking for imports to help supplement some
25 of their needs. How is Europe handling some of the

1 developing nations that don't have access to organic seed
2 varieties? They just have access to the conventional
3 varieties. How are they handling that in their rules and
4 mandates?

5 MS. SHELTON: Well, yeah. First to clarify, it's
6 2036, not 2026.

7 SECRETARY BRUCH: Sorry. I appreciate that.
8 Well, you know it's a little bit further out. Thank you.

9 MS. SHELTON: That's all right. But just, yeah,
10 I wanted to make that clear. Right now, within the EU
11 system, and annex system where within each country, a
12 country has the capacity to put crop and crop segments on an
13 annex. We've determined that for a particular crop segment,
14 maybe even a particular planting time of year, so maybe
15 spring lettuce, for example, that is on category one in the
16 annex, meaning that there's no exceptions allowed for using
17 conventional and treated seed. Organic growers have to use
18 organic seed. Those annex rules only apply to the growers
19 in that country. So any product that is being imported into
20 that country with an organic label is not currently, as I
21 understand it, held to that organic seed standard. Does
22 that answer the question?

23 SECRETARY BRUCH: That was helpful insight.
24 Thank you, Adrienne.

25 BOARD MEMBER JOHNSON: Allison?

1 BOARD MEMBER SMITH: Hi, Adrienne. Thanks for
2 your comments. You mentioned an organic seed database. So
3 the big question is, and I'm curious if you have thoughts on
4 who should hold that? Where would it live? Who would
5 maintain it?

6 MS. SHELTON: Yeah. I know that this is a tricky
7 topic because that's the big question, is who manages it? I
8 mean, from my perspective, I think having it be something
9 that is not housed within the seed industry is really
10 important to maintain a level of neutrality, of confidence,
11 because it's something that ultimately is going to be a
12 critical tool for all the stakeholders, for the producers,
13 the certifiers, and seed suppliers. So, to me, where that
14 database is housed is an important part of the discussion.

15 In the EU, it's managed by the governments
16 within each country. And so, to me, that's the most neutral
17 ground. But I know that that presents real challenges with
18 what we're able to do with databases within the USDA. And
19 so, you know, is it something that a group like -- I don't
20 want to put a group on the spot, but some sort of maybe a
21 nonprofit, you know, entity could somehow house it. That,
22 to me, it's not a clear -- that's something we still need to
23 figure out and figure out, how do we set it up in a way
24 that, you know, in my mind, it would be the seed company's
25 responsibility to keep the data up to date. Like they would

1 be inputting it, but being managed then by someone else.

2 And who that someone else is, I don't know yet.

3 BOARD MEMBER JOHNSON: Thank you.

4 BOARD MEMBER SMITH: Brian?

5 BOARD MEMBER CALDWELL: Adrienne, thanks so much.
6 I really appreciate your comments. I have two questions,
7 hopefully quick. Maybe not. First one is, I was interested
8 in your CO2 comments at the end. And if synthetic carbon
9 dioxide is not allowed for organic, would the CO2 produced
10 by your heating system have to be vented into the
11 atmosphere?

12 MS. SHELTON: If it wasn't allowed, I presume.

13 BOARD MEMBER CALDWELL: Yeah. In other words, if
14 synthetic CO2 was not allowed in organic production, I'm
15 thinking that whatever CO2 was produced by your heating
16 system would just have to be vented out, because otherwise
17 it would contaminate the crop.

18 MS. SHELTON: Yeah.

19 BOARD MEMBER CALDWELL: Okay. That's very
20 helpful, very interesting. Second of all, which is a harder
21 question, is if I was an organic grower and I wanted to grow
22 a seed crop, how could I be sure that it was not gene
23 edited?

24 MS. SHELTON: If you were an organic grower
25 wanting to grow a seed crop.

1 BOARD MEMBER CALDWELL: Yeah. Suppose I'm an
2 organic vegetable grower and I want to grow kale for seed.

3 MS. SHELTON: Uh-huh.

4 BOARD MEMBER CALDWELL: Maybe that's not a good
5 example, but something that could be gene edited, how would
6 I ever know whether the site might have to start with a
7 conventional, untreated source of seed, and I want to grow
8 organic seed, which is great. I wouldn't be increasing the
9 market and all that stuff. But how would I ever know
10 whether that was gene edited or not?

11 MS. SHELTON: Well, yeah, thank you for that
12 question, because that to me is sort of at the heart of the
13 challenge of the discussion around excluded methods, and
14 especially around excluded methods that are not traceable.
15 You know, like right now, you could walk into any
16 supermarket, pick any vegetable off the shelf. If you have
17 the tools, run an analysis to determine if that vegetable
18 was developed with GMO technology. Because there are very
19 distinct markers that are used in that technology, and so
20 that allows for third-party testing. But that's not the
21 case, of course, with gene editing, with induced
22 mutagenesis, with a number of breeding techniques. And so,
23 in that case, then you really are reliant on the producer of
24 that variety, like the person that developed the variety, to
25 tell you whether or not they use that technique. And that's

1 the real challenge, because right now, we have a seed system
2 where we have a lot of conventional seed being used in
3 organic production. And so it's really challenging to think
4 about asking all of the seed suppliers that are producing
5 seed that are being grown on organic farms to voluntarily
6 say whether or not they're using certain techniques that are
7 not allowed or are not aligned with organic principles. But
8 if we were to close, or at least to strengthen the organic
9 seed usage, to have a stronger organic seed industry, where
10 for -- in certain crop segments, we have a majority of the
11 suppliers supplying organic seed, then those suppliers could
12 say, okay, we have chosen to enter this market with organic
13 seed. We have chosen to serve the organic market. And so
14 we are also going to make sure that any varieties that we
15 are providing do not have these techniques.

16 It's like a code of ethics. We don't have that
17 right now. And it's really hard to even think about doing
18 that when we have such a leaky system. But there really is
19 no way, you know, that -- you know, the kale grower would
20 have to go to the supplier, the original developer of that
21 variety, and ask. And maybe they would tell them, and maybe
22 they wouldn't. And in cases like induced mutagenesis, maybe
23 the supplier knows whether there's a trait in there that was
24 developed with that technique, and maybe they don't. And so
25 it becomes very challenging.

1 BOARD MEMBER CALDWELL: Thank you. Thank you
2 very much.

3 BOARD MEMBER SMITH: Franklin, do you have a
4 question?

5 BOARD MEMBER QUARCOO: Yes. I want to go back to
6 a public comment that you made about induced mutagenesis,
7 that it should not be classified as an excluded method
8 because it is a technique that is consistent with the NOSB
9 definition and as traditional plant breeding. Now, the
10 amount of radiation that is used is typically higher than
11 what is normal. So my question is, if it is something --
12 normal radiation can cause certain things to happen in
13 plants. Now we are having a higher than usual amount of
14 radiation, which is not normal. And if the argument is
15 that, well, that could have occurred normally, do you
16 consider that a slippery slope that can be used to other
17 techniques that cause certain things to happen that could
18 have happened by chance or normally, but didn't happen
19 normally and was made to happen in an unusual way? Would
20 this be a slippery slope?

21 MS. SHELTON: Yeah. Well, yeah. Just to be
22 clear, I'm not suggesting that that's the reason that we
23 should allow induced mutagenesis. But nonetheless, I think
24 for sure -- I think that making determinations about
25 techniques based on whether or not they are feasible or

1 possible in nature, it is a slippery slope, because we
2 continue to learn about amazing things that happen in nature
3 that we didn't think were possible. Right?

4 Now, yes, for sure, I think, right. When we're
5 talking specifically about induced mutagenesis, you know,
6 the radiation that would be used or the chemical mutants
7 that are used, is that something that would likely happen,
8 you know, just naturally where a plant population would be
9 exposed to that? You know, no. No, I don't think so. But,
10 to me, basing what is possible in nature is a slippery
11 slope, because there are a lot of things that are possible
12 in nature that, you know, are quite outstanding.

13 And so then -- so then, yeah, maybe then you
14 still end up in a place where, actually, well, that's not
15 where you wanted to go with an argument. But, to me, I
16 think the reason to allow induced mutagenesis is that it's
17 clearly stated in the policy memo from 2013, 13.1, that it
18 is considered part of traditional green programs. It's been
19 around for almost 100 years. So it's something that is
20 quite embedded, I would say, in breeding techniques at this
21 point.

22 BOARD MEMBER QUARCOO: Thank you.

23 BOARD MEMBER PETREY: Thank you. Brian, also,
24 thank you for highlighting the CO2 comment. I just want to
25 go back to that, because this could really shorten our

1 carbon dioxide discussion, I do believe. So could you just
2 kind of walk through or explain the process, just very
3 simply, of the heating, the capturing, the re-bedding, all
4 of that? How exactly are you able to grab onto the CO2?
5 And just that method, just to clarify, so that we can really
6 use that in the board and probably shorten this discussion
7 up next week.

8 MS. SHELTON: I'll tell you what I know, and this
9 is certainly not my area of expertise. But I wanted to
10 mention it, because I know at the last meeting, there wasn't
11 a lot of public comment around this topic. So the way that
12 our greenhouse is set up is that we have large tanks where
13 we store water. And we use the water to heat the greenhouse
14 through, you know, metal rails that go through the
15 greenhouse. And so what we do is that we heat up the water
16 during the day, because the plants can only use the carbon
17 dioxide during the day -- or that's when they're most
18 efficient at using the carbon dioxide. So we heat the water
19 tanks during the day. And then, the byproduct is pumped
20 into the greenhouse. Specifically, what those pipes look
21 like, I can't tell you. I could certainly, you know, find
22 out more from our greenhouse management team. But then. at
23 night, when the plants don't need CO2, but they do need
24 heat, then we're running the hot water through the
25 greenhouse to keep the plants at the temperature that they

1 need to be at. So that's sort of the circular model that
2 we're using.

3 BOARD MEMBER PETREY: Okay. Great, and the CO2
4 is a byproduct of?

5 MS. SHELTON: Of heating the tanks, you know,
6 which is what you can heat the greenhouse. If we didn't
7 have this circular system, then we would just be -- well,
8 then it would be challenging, because we want the heat at
9 night.

10 BOARD MEMBER PETREY: Right, I'm sorry. What are
11 you heating it with? What is your method of heating?

12 MS. SHELTON: Oh, sorry, yeah. It's natural gas.

13 BOARD MEMBER PETREY: Okay, thank you. No,
14 that's great. Thank you so much for all that. And your
15 comments have been great. Appreciate them.

16 BOARD MEMBER SMITH: I've been doing real good on
17 time management, guys. And you are just tanking my track
18 record here. Jerry, quick.

19 MS. ARSENAULT: I think you're on mute.

20 BOARD MEMBER SMITH: Jerry.

21 BOARD MEMBER D'AMORE: Yes, thank you. A quick
22 question, please. As you are putting CO2 into the
23 greenhouse from the exhaust of your heating process, do you
24 have a target as to what the CO2 level should be in the
25 greenhouse vis-a-vis ambient?

1 MS. SHELTON: That I would have to find out.

2 BOARD MEMBER D'AMORE: Sorry.

3 MS. SHELTON: I would have to ask the greenhouse
4 team about that. Again, this is definitely not my area of
5 expertise, but, you know...

6 BOARD MEMBER D'AMORE: Well, thank you. Your
7 whole presentation has been fascinating. I appreciate it.

8 MS. SHELTON: Sure, you're welcome. And I can
9 try to find that out for you, if that's helpful.

10 BOARD MEMBER SMITH: Awesome. Yeah, if you get
11 any information, you can shoot it to Michelle, and she can
12 stick it into the Federal Register. Thank you so much for
13 your time with us today.

14 Rhodes Yepsen, you're next, then Connie Karr,
15 then Kathie Arnold. Rhodes, name and affiliation, please.

16 MR. YEPSSEN: Yes. Hi. Rhodes Yepsen with the
17 Biodegradable Products Institute. First, I would like to
18 extend my sincere appreciation for you as individuals for
19 the daunting task of reviewing thousands of comments each
20 meeting cycle on a diverse set of topics that must then be
21 resolved into policies. So thank you for that service.

22 At the heart of organic food production is
23 harnessing microbiological activity for soil health to grow
24 better food and support nature's systems. This delicious
25 and nutritious organic food is often packaged or served with

1 packaging, and we believe that supporting the use of
2 compostable packaging allows organic policy to extend and
3 connect the microbiological activity from the farm to the
4 table. Compostable packaging helps transform society's food
5 waste into a resource for healthier soil, with more and more
6 studies highlighting the importance of compost and how the
7 carbon actually is getting stored in the pores and even
8 attaches to minerals to bind carbon in the soil.

9 I want to say here for the record that BPI
10 requested and supported the NOSB consultation from the
11 outset of our petition, and in no way have we tried to
12 obfuscate NOSB's processes. I've traveled to each meeting
13 since filing the petition to present and engage in the
14 public comment process and to answer questions. We believe
15 our proposal supports a key goal of the OFPA, to align and
16 cooperate with state climate and human health initiatives.
17 OFPA was passed to harmonize different organic rules in many
18 states, and the regulation needs to be updated to harmonize
19 with states once again.

20 At this stage, what we're asking is for the NOSB
21 to please be mindful of how it phrases its recommendation at
22 the fall meeting so that we can avoid a protracted
23 disagreement. For more than a year, BPI has shared its
24 legal analysis that compost is not subject to national list
25 procedures under OFPA. We ask that NOSB consider rephrasing

1 its recommendation so that it's not a new proposed final
2 rule, and instead, is posed as a comment on BPI's existing
3 proposed final rule. What this would do is allow USDA to
4 proceed with publishing in the Federal Register and get
5 necessary legal guidance from the Office of General Counsel,
6 which we believe supports what both BPI and NOSB are asking
7 for.

8 If NOSB instead continues to list its
9 recommendation as a new separate proposed rule, we believe
10 this will cause a long and drawn out process to reconcile
11 the two, which wouldn't help either of us. While a subtle
12 shift where the NOSB submits a recommendation as a comment
13 on BPI's rule, as we originally hoped for, we believe this
14 would advance our common goals using an open and vibrant
15 rulemaking process, which gives the urgency we need based on
16 the timelines and California's law. This is the best method
17 of assessing the compliance of an organic policy within
18 OFPA. Publishing the petition as a proposed final rule will
19 let all the organic legal and technical experts weigh in.
20 The petition is seeking nothing more than this process. As
21 always, I welcome your questions and look forward to seeing
22 you in Portland, Oregon next week.

23 BOARD MEMBER SMITH: Thanks, Rhodes. Any
24 questions? Mindee? Yes, Mindee, go ahead.

25 VICE CHAIR JEFFERY: Hi, Rhodes. Thank you so

1 much for your comments and showing up for the NOSB process.
2 Totally appreciate you. Really appreciate the work that the
3 compostable packaging industry is doing, especially to
4 eliminate the use of single-use plastics. Thank you. I'm
5 curious about how long does it take for a manufacturer to
6 achieve a BPI-certified compostable? Like from the time
7 they want to achieve being allowed to use the BPI label
8 until they can use it on their label -- ballpark.

9 MR. YEPSEN: Yeah, it's a good question. There's
10 a fairly long range, and part of that has to do with whether
11 the raw ingredients have already been tested themselves or
12 whether it's a brand new, you know, raw material. So we see
13 things from as short as 60 days if everything's been tested
14 and we're just checking the final product. Right? So the
15 resins and raw materials and paper products have been
16 certified, and we're just checking the final, whereas
17 something that's brand new and has a lot of new ingredients
18 that need to be assessed can take upwards of two years.

19 VICE CHAIR JEFFERY: Great, thank you. And
20 second question, so if BPI runs into a problem wherein a
21 manufacturer changes how they're creating their packaging,
22 how do you deal with those changes and what do you do about
23 noncompliances?

24 MR. YEPSEN: Yeah, great question. So we
25 require -- first of all, we require every certification to

1 get recertified a minimum of every three years, where
2 companies have to send in additional samples, do additional
3 tests, where we're not only checking, again, does it meet
4 the existing criteria, but comparing it to the original
5 samples to see if anything has changed.

6 In the process, if somebody is making a change
7 within that three-year process, we have a modification form
8 where somebody can submit and we document, you know, what
9 they have changed and decide what additional tests, if any,
10 are needed to cover that. Our certification scheme that's
11 on our website is about 20, 30 pages long. It includes a
12 lot of those details about rules. For instance, when
13 something is like-to-like that can be swapped and when it
14 needs new tests. For noncompliance, we give companies a
15 warning. We ask for samples to test. And in the case of
16 somebody cheating the system, they get delisted from our
17 database. And if it is seen to be intentional, in some
18 cases, we have barred companies from re-entering our
19 certification process. That doesn't happen often, but in
20 severe cases of abuse of the system, we actually bar
21 companies from recertifying any product with us in the
22 future.

23 VICE CHAIR JEFFERY: Great, thank you. So it
24 sounds like it's a lot of testing to determine eligibility.

25 MR. YEPSSEN: It is, yes. So there are a variety

1 of tests required in the ASCM standards and then additional
2 tests that BPI requires on top of that. But these range
3 from the biodegradation and composting, where you're looking
4 at the conversion of carbon into CO2 to make sure that it's
5 not bioaccumulating in the soil, disintegration, the
6 physical visual breakdown of an item during an active
7 compost process, plant toxicity testing, looking at seed
8 emergence biomass of the plants compared to a blank compost,
9 heavy metals, PFAS testing, things like that.

10 VICE CHAIR JEFFERY: Appreciate the information,
11 Rhodes. Thank you so much.

12 MR. YEPSEN: Yeah, thanks.

13 BOARD MEMBER SMITH: Okay, Allison.

14 BOARD MEMBER JOHNSON: Thanks, Rhodes. I know
15 BPI has been a leader in many ways on compostability, so
16 appreciate all your work. I was frantically looking through
17 documents as you were speaking, trying to find an answer to
18 my own question, but I couldn't, so I'll just ask you. I
19 think you referred to a proposed rule, and I'm not aware of
20 a proposed rule. Could you clarify what you were talking
21 about, as far as a proposed rule and another proposed rule?

22 MR. YEPSEN: Sure. Thanks for asking. Yes. So
23 the BPI petition to USDA submitted last year is a proposed
24 rule. Our understanding, which can be a complicated
25 process, so maybe I've misunderstood, our understanding is

1 after consultation with the NOSB, one of the actions is for
2 USDA to potentially proceed and publish that in the Federal
3 Register. Today, it has not been published anywhere except
4 for in the request for consultation to the National Organic
5 Standards Board. Otherwise, it is invisible to the public.

6 What we've seen in the proposal for the fall
7 meeting from the NOSB's documents from the Crop Subcommittee
8 is a proposal for a different rule for a change to the
9 definition of compost. And so I think that's where our
10 concern is, is that depending on how that proposal ends up
11 after the fall meeting, it could look like a comment on our
12 proposed rule, which is what we are hoping for. And that
13 allows things to advance and be resolved through legal
14 analysis. If our reading is correct and it's worded instead
15 at the NOSB fall meeting, a separate proposed rule, what
16 that would look like is two competing proposed rules for
17 USDA to have to resolve, which we understand to be a
18 protracted, lengthy process.

19 BOARD MEMBER JOHNSON: Okay. So the proposed
20 rule, when you use that term, you're talking about BPI's
21 proposal.

22 MR. YEPSEN: And the Crop Subcommittee proposal
23 of the updates to the definition of compost in the
24 regulation.

25 BOARD MEMBER JOHNSON: Okay. I'm a lawyer and

1 kind of admin law, having got confused because USDA can
2 propose a rule, or they can publish a notice of a proposed
3 rule, but they haven't proposed a rule. And they're the
4 only entity that could.

5 MR. YEPSEN: Correct. Sorry. So, yeah. We have
6 requested a revision of a rule change, and we believe the
7 Crop Subcommittee is doing something similar. And that's
8 why we're asking, you know, if there's some consideration to
9 rephrase it as a comment on our proposed rule and let the
10 rulemaking process, if USDA decides to move forward to your
11 point, to resolve any legal questions around OFPA.

12 BOARD MEMBER JOHNSON: Thanks for clarifying.

13 BOARD MEMBER SMITH: Any other questions? Wait.
14 Oh, wait. Who? Wait. I see Nate pointing.

15 BOARD MEMBER LEWIS: Amy.

16 BOARD MEMBER SMITH: Oh, Amy. Is her hand not
17 working again?

18 SECRETARY BRUCH: It's not working again. I
19 apologize. Got to do it the old fashion way.

20 Thank you, Nate, again. And thanks, Kyla.
21 Rhodes, thank you for your time here today. I have several
22 questions. I know that there's a lot of other folks
23 representing on this topic as time goes on. So I'm going to
24 ask you one in particular. It was a written comment that
25 actually said compostables break down differently in

1 industrial compost scenarios versus, you know, more
2 authentic mom and pop type compost operations. Is there
3 truth to that statement? Are you seeing a difference in
4 degradation if it's an industrial-type composter?

5 MR. YEPSEN: Yeah. So what I would say is
6 compost is a controlled biological process. And we try to
7 use good terminology to make distinctions between, you know,
8 types of composting. But, you know, industrial down to --
9 or commercial large facilities down to a backyard pile, you
10 can find relatively similar conditions, depending on what
11 you're looking at. And so I think the big factors we see in
12 the variation from a very small scale to a large scale, one
13 of the biggest factors going down to a home compost size or
14 a smaller on-farm compost is whether you have sufficient
15 mass to reach and maintain high temperatures for pathogen
16 reduction and really active microbial biological
17 populations.

18 In some cases at a really large scale facility,
19 you may get really high temperatures. Again, this could
20 also happen at an on-farm compost operation where you have
21 spontaneous combustion, really high heat. And that can
22 cause biological, you know, fungi to go dormant, which is
23 typically more problematic for cellulose-based items like
24 paper. So the short answer is not really. We see
25 consistent compostability results at facilities of all

1 sizes. As you get to those smaller sizes in a backyard pile
2 where you can't reach -- most people, I should say, do not
3 reach thermophilic conditions regularly, then, yes, that
4 would require a different set of tests, which BPI has been
5 investigating for the last couple of years of a different
6 set of criteria for backyard composting, which could apply
7 to a community composter or a smaller farmer, if they're not
8 able to get those temperatures in the upper mesophilic and
9 thermophilic ranges.

10 SECRETARY BRUCH: Okay. That sounds good. I'll
11 see if I can get access to some of the lab data, because
12 there was indication that lab data was not reconciling with
13 BPI data based on just the degradation. So I just want to
14 make sure I'm understanding the whole situation. I mean,
15 testing, big proponent of it. We've got a lot of
16 initiatives on the board about testing, but we do need to
17 understand the results of that. And then you mentioned
18 biodegradation in compost or in the soil. Is there a ratio
19 of compostables to compost? You mentioned mass. Is there a
20 ratio that is better, that is a rule of thumb that folks
21 need to use if they are combining these compostables into
22 compost piles to achieve, you know, this degradation that
23 you're seeking?

24 MR. YEPSEN: No. No. Yeah, not that we're aware
25 of. I can give you a reference to some studies showing how

1 items break down in commercial scale facilities. And if you
2 find the reference, I'm happy to read it. In terms of what
3 percentage is too much, right, we have started to look at
4 that. And particularly for compost facilities that are
5 serving really large zero-waste events, think of like
6 festivals, music festivals, where they might not have a lot
7 of food, and they have more packaging than food, compared to
8 a stream collected that has a nice mix. And so a few years
9 ago, we worked with a group of composters to evaluate what
10 happened if you displaced 15 percent or 30 percent of a
11 given compost pile with compostable packaging, would you
12 still have the right carbon to nitrogen ratio, the right
13 bulk density, the right moisture, to have a robust
14 composting process? And does it influence the finished
15 compost? And the study found that there was no noticeable
16 impact on the ability of a facility to operate, even at that
17 30 percent level, which we've never seen a facility actually
18 receiving that volume of compostable products compared to
19 conventional feedstocks.

20 SECRETARY BRUCH: Okay. Thanks, Rhodes.

21 MR. YEPSEN: Yeah.

22 BOARD MEMBER SMITH: I think that's it. Thanks,
23 Rhodes.

24 MR. YEPSEN: Yeah, thank you.

25 BOARD MEMBER SMITH: Okay. Connie Karr, you're

1 up next, then Kathie Arnold, then Noah Wendt. Connie, name
2 an affiliation, and you can get started.

3 MS. KARR: All right. Good afternoon, members of
4 the National Organic Standard Board. My name is Connie
5 Karr, and I am working with the Accredited Certifiers
6 Association and alongside many organic certifiers. I'm here
7 to provide a quick update from the certifier's perspective
8 on the implementation of the Strengthening Organic
9 Enforcement, or SOE, and to explain why adopting risk-based
10 certification is crucial for the future of organic
11 certification. First off, let me say that implementing SOE
12 has been, to put it lightly, a real challenge. Certifiers
13 have been stretched thin, managing an expanded oversight of
14 new entities, such as brokers, traders, and storage
15 facilities, many of which who had no previous certification
16 and were exempt. And while the SOE rules are essential to
17 maintaining the integrity of the organic label, the
18 increased responsibilities from NOP import certificates to
19 supply chain audits and more have made it tough to keep up
20 with the sheer volume of work. Think of it like watering a
21 garden during a drought. We're doing our best, but there's
22 a lot of ground to cover.

23 Certifiers are working within a rapidly growing
24 sector -- more operations, more complexity, and frankly,
25 more challenges as they work to uphold the standards.

1 Certifiers are feeling the strain. They've invested in new
2 technology, they train staff, and they try to adapt quickly
3 to ensure compliance. But at this pace, we risk burning out
4 the very people responsible for protecting the organic
5 label. I mean, if I had a nickel for every new report we
6 had to do as a certifier, new files or new things we had to
7 do, I'd be able to start my own organic farm. And that's
8 why I'm here, to support the adoption of risk-based
9 certification.

10 This system would allow certifiers to focus on
11 the high-risk operations, those that pose the greatest
12 threat of fraud, while reducing the unnecessary oversight on
13 lower-risk operations. It's not about cutting corners; it's
14 about using our resources wisely. After all, not every
15 carrot in the bunch is rotten, but we have to keep our eye
16 on the ones that might be.

17 We've seen similar approaches work successfully
18 in other regulatory systems, such as customs agencies, that
19 prioritize high-risk imports, allowing some of the lower-
20 risk shipments to move more efficiently. Risk-based
21 certification would do the same for organic, helping us
22 scale our efforts as the markets grow. As the organic
23 industry expands both domestically and internationally,
24 risk-based certification is key to making sure the system
25 scales effectively, while preserving the very values that

1 make organic special. We're not asking to reinvent the
2 organic wheel, we just want to keep it rolling smoothly,
3 without turning it into an overgrown compost heap. Adopting
4 risk-based certification will allow us to maintain strong
5 enforcement, sustain the growth of the industry, and ensure
6 that certifiers can continue to serve effectively. Thank
7 you for your time, and let's continue growing this movement,
8 and maybe a little less paperwork. Thank you.

9 BOARD MEMBER SMITH: Thanks, Connie. Any
10 questions for Connie? I have one. So I asked a previous
11 commenter, just if you could wave your magic risk-based
12 certification wand, like, what does this look like for us?

13 MS. KARR: As a community or as certifiers?

14 BOARD MEMBER SMITH: Like you can't talk about
15 one without the other, really? Like, so what's the three
16 top things that would be like beneficial to both low, medium
17 risk operations and certifiers, together?

18 MS. KARR: A few things that it could look
19 like -- I heard a commenter earlier talk about multi-year
20 certifications, where the people that have demonstrated
21 ongoing compliance year over year over year, maybe have
22 simplified, or, you know, remote audits versus an annual
23 audit, it could be a multi-year certification. Could also
24 look, remote audits is a great example for some of those
25 lower-risk operations. You know, I love watching Rusty in

1 the farm, in the fields right now using technology, and as a
2 certifier, I can see exactly what he's doing. He's
3 harvesting his corn. So there's a lot of opportunity with
4 technology to utilize it and to reduce that burden and
5 strain, particularly on lower risk operations. Just a
6 couple ideas, I have lots more.

7 BOARD MEMBER SMITH: Perfect. Keep them coming.
8 Anybody else, questions, for Connie? Okay. Thanks, Connie.

9 Kathie Arnold, you are up next, and we have Noah
10 Wendt, and then Paul Biagiotti. Kathy, name and
11 affiliation, and then you can get started.

12 MS. ARNOLD: I'm Kathie Arnold, and I farm at
13 Twin Oaks Dairy, LLC, in Truxton, New York, with my son. We
14 have 160 dairy cows, 100 young stock, and over 800 acres of
15 certified pasture, hay, and crop land. I appreciate being
16 able to provide comments on the possibility of Meloxicam
17 being approved for use in organic livestock and poultry. I
18 started farming on this farm in 1980 with my late husband
19 and his late brother. We began shipping organic milk in
20 1998, prior to the NOP's existence. I was and am thankful
21 that a strict materials list was first instituted, and that
22 the NOSB and NOP have been stringent as materials have been
23 added. In order to maintain organic consumer and farmer
24 confidence, it is imperative that new materials added to the
25 national list continue going through an impeccable review

1 process.

2 I am opposed to the blanket addition of Meloxicam
3 to the list, because it has not had a technical review. The
4 petition did not address Meloxicam's use in non-bovine
5 livestock and poultry, and left other questions unanswered
6 as well. To add Meloxicam to the national list for use in
7 all livestock and poultry, at this point, is jumping the gun
8 and throwing to the wind the stated NOSB process of a
9 technical review for each new material. Especially, given
10 that Meloxicam is not FDA approved for use in livestock and
11 poultry, given that Meloxicam can cause side effects in
12 humans, and given that there is no clear dosage and
13 withholding time for different livestock species, body
14 weights, and stage of production.

15 I urge the NOSB to recommend adding Meloxicam to
16 the list at this time, only if it has an annotation that it
17 can solely be used on bovine calves less than one year of
18 age for use during dehorning and disbudding. My family and
19 I have successfully practiced organic dairy for 26 years.
20 Waiting another year or two until Meloxicam has been through
21 a proper technical review is not a hardship. Thank you.

22 BOARD MEMBER SMITH: Thanks, Kathie. Questions
23 for Kathie. I don't see anything, thanks for your time
24 today. Okay.

25 MS. ARNOLD: You're welcome.

1 BOARD MEMBER SMITH: Then we have Noah Wendt.
2 Paul Biagiotti, sorry if I'm pronouncing that wrong, and
3 Alice Runde. Noah, name and affiliation, please.

4 MR. WENDT: Can you hear me? Okay. Noah Wendt,
5 a member of the Organic Farmers Association. Okay. Thank
6 you to all the members of the National Organic Standards
7 Board for hearing farmer and ag-related professional voices
8 at your meetings, whether virtually or in person. My name
9 is Noah Wendt. I'm a member of the Organic Farmers
10 Association on the OFA Crop Insurance and OSB Working Groups
11 and on the Iowa Organic Association Board of Directors, and
12 also a TOP mentor.

13 Since 2015, our farm has transitioned 1,750 of
14 our 2,800 acres to organic production. Our passion for
15 caring for the land and providing a safe food supply
16 continues to be the driving force in organic production. In
17 addition to the farm, I have my own crop insurance agency.
18 Both as an organic farmer and as a crop insurance agent, I
19 really appreciate the work that NOSB has done on crop
20 insurance over the past few years. I support the proposal
21 and want to speak on three related topics regarding crop
22 insurance for organic producers.

23 Number one, the need for more education with the
24 AIP to help support the agents that are selling organic crop
25 insurance policies. I sell crop insurance to several

1 organic farmers, and the AIP that we use is not well-versed
2 in all the rules that pertain to organic crop insurance.
3 It'd be great if we could have the RMA have a specialist
4 that is able to help out the AIPs with some of these
5 questions. As an agent, I often have to do the research and
6 then tell the AIP how this should work.

7 Allowing -- number two, allowing transitional APH
8 to be included in the organic APH. The RMA has done a great
9 job increasing key yields in the last three years to help
10 farmers realize a higher APH for transition and organic
11 certified yield lines. One thing that would help producers
12 be able to include the transition APH in the organic APH to
13 help the organic APH. It takes a long time to build up
14 these APHs with the diverse crop rotation that we have.

15 Number three, continued enhancements to the whole
16 farm revenue product. 2024 year was my first year taking
17 out whole farm revenue. I have a diverse crop rotation --
18 corn, soybeans, field peas, hemp, sunflowers, buckwheat, and
19 hard red winter wheat. Only the corn and soybeans are
20 insurable under a normal crop insurance policy. To have a
21 robust whole farm revenue policy is important to me. I
22 think the basic structure of whole farm revenue is good.
23 Some suggestions might be to make it organic specific where
24 just organic crops are insured or potentially even make it
25 specific to non-insurable crops. Also, a higher commission

1 for agents that are selling whole farm revenue for the
2 amount of time that they have involved, and potentially
3 allowing the insured to insure up to 100 percent or more of
4 their expected income. Thanks for your time and your
5 service today.

6 BOARD MEMBER SMITH: Thanks, Noah, for your
7 comments. Any questions? Amy, are you looking -- are you
8 trying to ask a question? I can't tell.

9 SECRETARY BRUCH: I know, I apologize. Sorry, I
10 just heard my hand matches the crops in the field, so I
11 apologize. It's hard to even see me raising my hand
12 manually. But, Noah, thank you so much for your time today.
13 I really appreciate you multitasking and harvesting crops
14 and participating in our process and all the leadership you
15 have for farmers that are farming organic. The challenges
16 that you highlighted here for organic crop insurance are
17 really something that we need to elevate and continuously
18 elevate. In terms of -- have you ever been impacted? You
19 mentioned the crop rotation and also building your TA
20 yields. Have you ever altered your crop rotations just
21 because of not having insurable crops? I know you said you
22 just recently went to whole farm this year. I know there's
23 some prerequisites that make it challenging initially to
24 deploy whole farm on fields, but before you had whole farm,
25 did you allow for the lack of insurance to influence your

1 crop rotations?

2 MR. WENDT: We didn't. It's awfully tempting,
3 just because you know that you can have an insured product
4 there either with oats, corn, or soybeans in the counties
5 that we're in. We still believed that having the diverse
6 rotation was the thing that we needed to do, so we didn't.
7 But I can see where it would be very tempting to do that to
8 get the guarantees. Especially when you go through times
9 like right now when these prices are so tough.

10 SECRETARY BRUCH: Uh-huh. Absolutely. Okay.
11 Thank you. I appreciate your time today.

12 MR. WENDT: Thanks.

13 BOARD MEMBER SMITH: Thanks, Noah.

14 MR. WENDT: All right. Thank you.

15 BOARD MEMBER SMITH: Okay. Up next is Paul
16 Biagiotti -- Biagiotti, sorry if I'm pronouncing that wrong,
17 and we have Alice Runde, and then David Gould. Paul, please
18 state your name and affiliation, and then you can get
19 started.

20 MR. BIAGIOTTI: Good afternoon. My name is Paul
21 Biagiotti. Well done, Kyla. I'm a dairy veterinarian,
22 currently based in Northeast Pennsylvania. I'm employed by
23 Danone North America, but the comments I make today are mine
24 alone.

25 I've practiced on organic and conventional herds

1 for over 36 years. Based on my experience in organic dairy
2 farms, I've authored a book titled Practical Organic Dairy
3 Farming, published in 2016 by Horst German Books. At my
4 graduation from Tufts Veterinary School, we recited the
5 veterinarian's oath. It states in part, "Being admitted to
6 the profession of veterinary medicine, I solemnly swear to
7 use my scientific knowledge and skills for the benefit of
8 society through the protection of animal health and welfare,
9 the prevention and relief of animal suffering, the
10 conservation of animal resources, the promotion of public
11 health, and the advancement of medical knowledge."

12 If anything in livestock husbandry has changed in
13 the decades following my graduation, it has been an
14 increasing emphasis and attention given to overall animal
15 welfare, and especially the prevention and relief of animal
16 pain and suffering. But some things have not changed.
17 While polled dairy bulls, those animals that pass on the
18 dominant gene, for lack of horn production for progeny, are
19 slowly becoming more available, most dairy and beef calves
20 are currently born without the polled gene. For safety
21 reasons, that of both the cattle themselves and their human
22 caregivers, calves must be disbudded to avoid horn
23 development. Removing horn buds remains one of the most
24 painful episodes in a dairy calf's life. Horn buds are
25 obliterated using thermal cautery with a hot iron, the heat

1 being created either by electricity or gas. Horns with
2 advanced development may be surgically removed. Regardless
3 of method, the brief procedure is painful, not only while it
4 is carried out, but also for days afterwards as the wound
5 heals. Pain from the procedure itself is relieved by
6 application of a nerve block using Lidocaine, a local
7 anesthetic already on the NOP list, but Lidocaine's effect
8 lasts only about an hour and a half. Research clearly
9 demonstrates that pain and discomfort persists for several
10 days after disbudding. It is here that additional
11 analgesics are most needed in the organic medical toolbox.

12 Adult cattle as well suffer from both acute and
13 chronic painful conditions. Lameness is a major welfare
14 focus on modern dairies. Meloxicam's ease of use, economy,
15 and long activity make it quite suitable as a therapy for
16 lame cows. Mastitis and pneumonia are two other common
17 afflictions of adult dairy cattle. Cows with either illness
18 benefit from the fever and pain relief provided by
19 nonsteroidal anti-inflammatory drugs such as Meloxicam. I
20 therefore fully support that Meloxicam be added to the
21 national list of synthetic substances allowed for use in
22 organic livestock production. Thank you for your time and
23 consideration.

24 BOARD MEMBER SMITH: Nailed that. Great at the
25 buzzer.

1 MR. BIAGIOTTI: I practiced.

2 BOARD MEMBER SMITH: I see a question from Kim.

3 BOARD MEMBER HUSEMAN: Thank you, and thank you,
4 Dr. Biagiotti. I really appreciate your input today. As I
5 was speaking to some other dairy producers, I think some of
6 the well-being, at least on the dairy herd side, is really
7 on mama cows. And it sounds like, at least when I lived in
8 West Texas, in that dairy market, the baby calves were not
9 kept mostly on farm. They were sent to some other living
10 arrangement, a calf dairy, where they were raised. In order
11 to produce milk, you have to have pregnancy, you have to
12 birth, and then you have heifers and you have bull calves.
13 And heifers can go back into the market to produce milk.
14 Unfortunately, bull calves cannot. And most of those feed
15 into the meat industry. And for that to happen, you likely
16 to get the best meat product, you're going to castrate these
17 calves. Can you speak to some of the issues or concerns
18 with castration? And sometimes that's done at a timely
19 fashion, sometimes it's done in a different fashion. But is
20 there a use -- it was mentioned in the petition, and I'd
21 like your feedback on some of the concerns with that
22 procedure and the use of Meloxicam.

23 MR. BIAGIOTTI: Sure. Yeah, I belong to the
24 American Association of Bovine Practitioners, which has
25 clear guidelines on pain relief, and especially in

1 castration and dehorning. So we strongly advocate for both
2 a nerve -- just like disbudding, a nerve block for immediate
3 pain relief, and something for the lingering pain that the
4 procedure produces.

5 BOARD MEMBER HUSEMAN: And that can be at any age
6 of steer? I mean, I know that generally --

7 MR. BIAGIOTTI: We -- as a profession, we
8 recommend as early as possible.

9 BOARD MEMBER HUSEMAN: Okay.

10 MR. BIAGIOTTI: Early age, yeah. It's less
11 traumatic. Just, and again, akin to dehorning, right? The
12 earlier you do it, the less traumatic it is.

13 BOARD MEMBER HUSEMAN: Exactly.

14 MR. BIAGIOTTI: Yeah.

15 BOARD MEMBER HUSEMAN: Thank you.

16 MR. BIAGIOTTI:: And I'm a dairy vet, not a beef
17 practitioner, but I've certainly castrated many, many
18 hundreds of male bovines.

19 BOARD MEMBER HUSEMAN: It's very hard to have one
20 without the other, although they do go down different
21 pathways.

22 MR. BIAGIOTTI: Well, there's -- you know,
23 there's sex semen use, right, has -- you can choose what sex
24 you want. That's allowed in organic production. And I will
25 say, bull calves, while in the past they may have been --

1 there are periods when they are near worthless, they are
2 bringing hundreds of dollars. They're a real cash cow, no
3 pun intended at the moment. Bull calves, even dairy bull
4 calves, are bringing hundreds -- 700, \$800.

5 BOARD MEMBER HUSEMAN: Yup. It's a great revenue
6 stream for the organic industry, for sure.

7 MR. BIAGIOTTI: Yeah.

8 BOARD MEMBER HUSEMAN: Thank you.

9 BOARD MEMBER SMITH: Another question by Nate.
10 Nate, go ahead, Nate.

11 CHAIR POWELL-PALM: Thank you, Dr. Paul. One of
12 the commenters recently said that, quote, they can live
13 without Meloxicam for another year. It's not going to hurt
14 them. Are we really talking about farmers' pain here, or
15 are we talking about the oath that veterinarians made, and
16 we all have, to defend those animals in our care? And I'll
17 rephrase that.

18 MR. BIAGIOTTI: Yup. I don't quite --

19 CHAIR POWELL-PALM: Yup.

20 (Cross-talk.)

21 CHAIR POWELL-PALM: The value of this material is
22 for the animals. We're trying to relieve the pain and
23 suffering --

24 MR. BIAGIOTTI: Absolutely.

25 CHAIR POWELL-PALM: -- of those animals.

1 MR. BIAGIOTTI: Sure. You bet. Unfortunately,
2 in veterinary medicine, we have to deal with the owners,
3 right? So we're -- you know, I'm mainly concerned with the
4 patient, right?

5 CHAIR POWELL-PALM: Yeah.

6 MR. BIAGIOTTI: And, unfortunately, it's a
7 package -- not unfortunately. I've had some wonderful
8 relationships. Kathie Arnold was one of our -- I worked at
9 the practice -- my first practice did some of Kathie
10 Arnold's work, she may remember -- from Truxton, New York.
11 So, anyway, does that answer your question? I --

12 CHAIR POWELL-PALM: It does. Yeah. Thank you so
13 much.

14 MR. BIAGIOTTI: Okay.

15 CHAIR POWELL-PALM: I appreciate that.

16 BOARD MEMBER SMITH: I also have a question for
17 you, Dr. Paul. So I've been asking some commenters this,
18 but the current -- as I understand it, the closest
19 alternative that is currently allowed on the national list
20 is Flunixin, that is comparable to Meloxicam. Is that
21 fairly accurate?

22 MR. BIAGIOTTI: Correct. It's a nonsteroidal.

23 BOARD MEMBER SMITH: Yup. Right. Okay. So --
24 and as a -- so like, as a drug, those are like pretty
25 similar, except for the form is, I think, a little

1 different, and the length of -- of action time that it -- it
2 acts. What else are -- what else are the differences as a
3 drug?

4 MR. BIAGIOTTI: As Dr. Karreman mentions,
5 Meloxicam -- the amine is not very effective for
6 osteoarthritis, musculoskeletal pain. Right? So as may be
7 brought on by dehorning. They're both nonsteroidal anti-
8 inflammatory drugs. Banamine, Flunixin meglumine, the
9 injectable form, if not given intravenous, can cause
10 horrendous tissue necrosis, muscle necrosis, clostridial
11 possible -- you know, clostridial side effects. There's no
12 oral form of mouth -- by mouth form of Flunixin, that I'm
13 aware of. The pour on, the topical is an innovation. It is
14 more expensive. Right? I mean, we are -- dairy farming is
15 a business. It is more expensive. Meloxicam -- we've used
16 Meloxicam for years and years on our own dairy and beef
17 calves. It's dirt cheap. It's oral. It's easy to give.
18 It's -- it has a long duration of action. No side effects
19 I'm aware of.

20 Flunixin does have some human, the pour on
21 especially, while it's easy to give, it's a strong --
22 according to the label, it's a strong ocular irritant. So
23 it can -- I believe it can cause corneal damage to people,
24 to the administrator. So, you know, on many farms, the kids
25 are the ones who take care of the calves. So, anyway,

1 it's -- it's Flunixin is a wonderful -- yeah. All right.

2 BOARD MEMBER SMITH: I think my, I think my --
3 where my comment is coming from is -- or questions are
4 coming from is that Flunixin is not restricted, as I had
5 said previously, by age of the species, by species, or by
6 use. And that was some of the, you know, comments that --
7 that some commenters made was wanting us to restrict
8 Meloxicam in those ways. And so we already have a material
9 that is very similar, you know, to Meloxicam that isn't
10 restricted. And so I'm -- am I thinking about this
11 correctly? Like --

12 MR. BIAGIOTTI: Both are prescription. Right?
13 Both have a -- or need a need or a milk withhold, which will
14 differ. Right? Depending, even though they're both
15 nonsteroidals, those -- you know, that's up for the, you
16 know, you folks in the FDA to determine the meat withhold.
17 There are recommended -- there is good research on
18 Meloxicam's, you know, pharmacology. Right?

19 BOARD MEMBER SMITH: Okay. Thank you.

20 MR. BIAGIOTTI: Yeah. Yup.

21 BOARD MEMBER SMITH: Okay. Up next, we have
22 Alice Runde, then David Gould, then Andy Boone.

23 MS. RUNDE: Hi.

24 BOARD MEMBER SMITH: Hi, Alice. Name and
25 affiliation, and you can get started.

1 MS. RUNDE: Thank you. My name is Alice Runde.
2 I'm the operations director at the National Organic
3 Coalition. First, NOC applauds the NOSB for looking at
4 risk-based certification. We know this will take
5 considerable time and effort, but we see issues with the one
6 size fits all certification, especially as the SOE rule is
7 implemented. We also know that as we adopt risk-based
8 practices, we don't want to let things fall through the
9 cracks. We need uniformity among certifiers as to how any
10 risk-based approach is applied. We must avoid discrepancies
11 that could lead to certifier shopping and that could allow
12 fraudulent products to enter organic systems. Whatever
13 system is developed must be put into enforceable rules.
14 Otherwise, there is always a chance of differing sets of
15 standards due to varying interpretations.

16 A sound and sensible approach to organic
17 certification may also allow some small scale, diversified
18 operations for whom organic certification has not been
19 accessible due to many barriers of certification itself and
20 their certification. We encourage the NOSB to consider an
21 equity lens when discussing risk-based certification.

22 Secondly, we encourage the NOSB to consider the
23 equity impact of any decision the board makes. In our
24 written comments, we offer a detailed explanation of why it
25 is crucial for the board to prioritize racial equity work.

1 And we offer suggestions on what that -- what that work
2 could be. We encourage the NOSB to add racial equity
3 training to the new member onboarding process, and as a
4 standing work agenda item for discussion of how racial
5 equity can be integrated in all of the NOSB work.

6 Third, on plastics, there's an increasing
7 recognition of the ubiquity of microplastics in our world.
8 They are present in everything -- food, soil, human bodies.
9 The discussion of plastic use and organic production and
10 handling is critical, but nuanced. Plastics are useful for
11 organic production. However, organics should also be out in
12 front of the movement to reduce plastic use and
13 environmental contamination caused by that use. NOC
14 encourages the NOSB to initiate discussions on setting
15 priorities for reducing plastic use in organic production
16 and handling and picking the low hanging fruit first. It
17 might be useful to break the discussion into two parts:
18 plastic use in production, and plastic use in packaging.
19 And then, within those two systems, start the process by
20 identifying which plastic uses are essential and which are
21 optional, encouraging reuse when appropriate and research
22 into alternatives and their commercial availability. In the
23 spirit of continuous improvement, organics should lead the
24 way in finding alternatives that are viable and available.

25 And finally, NOC appreciates the in-person oral

1 comments in Milwaukee and applauds the board for making the
2 space for that to happen again in Portland. In-person
3 public comments encourage additional community involvement
4 in board meetings and increases the public awareness of NOSB
5 deliberations. Having both virtual and in-person options
6 gives multiple paths for public participation in the future
7 of organics. We recognize the time constraint for a meeting
8 agenda and would also encourage the board to make time for
9 more people to be heard in person when possible. NOC urges
10 the board to make similar in-person public comments sessions
11 a routine part of the agenda for future board meetings.
12 Thank you.

13 BOARD MEMBER SMITH: So many names. Thanks,
14 Alice. Any questions for Alice? I see one from Nate.

15 BOARD MEMBER LEWIS: I appreciate the roadmap on
16 plastics. I think it's something that the board as a whole
17 is sort of grappling with. And I think we oftentimes focus
18 on plastic use as mulch and crop production, because that's
19 what we have on the national list. But do you -- and I
20 don't -- you know, one thing for NOC to consider and maybe
21 you can weigh in on it now is in that conversation, should
22 we also be looking at like baling twine and silage wrap,
23 which from my understanding is a much larger user of
24 polyethylene than greenhouse films or crop mulching things?
25 So I don't know if you had time to talk about that now, you

1 don't have to, but it's something I'm trying to chew on how
2 we deal with plastic that isn't on the list, but does pose a
3 bigger problem in terms of tonnage out in the environment.

4 MS. RUNDE: Yeah. Yeah. Thanks, Nate. That's a
5 great question. And admittedly, I'm not the expert on
6 plastic use in organic on our team, but I'd be more than
7 happy to circle back to our coalition members and our
8 experts on staff and get back to you. You know who that is?

9 BOARD MEMBER SMITH: Other Nate.

10 CHAIR POWELL-PALM: Thanks for your comments,
11 Alice. I was wondering if you could sort of just consider
12 with me for a second that with the open slots we do have for
13 in-person comments, I'm always really surprised how quickly
14 it fills up with kind of what I would describe as, lovingly,
15 the same old actors. NOC always takes a few spots. OFA
16 always takes a few spots. And is there a way in which we
17 can say we're going to hold these for farmers, rather than
18 continuously making sort of the lobbyist groups' voices
19 elevated, rather than those that you prefer to want to
20 elevate the voices of?

21 MS. RUNDE: Yeah. I think that's a really great
22 comment, Nate. And I'll just point out that NOC has one
23 slot in the in-person sessions because we do agree that
24 those slots should be open to people who are local and may
25 not have other opportunities to participate in the NSP

1 processes.

2 CHAIR POWELL-PALM: Do you have any suggestions
3 for how we might set up a system where we say, farmers only
4 or some other, you know, sort of catch there?

5 MS. RUNDE: Yeah. I'd love to think about that a
6 little more --

7 CHAIR POWELL-PALM: Sure.

8 MS. RUNDE: -- but I think we have talked
9 internally about what it would look like for somebody to be
10 able to filter those registrations and limit some slots just
11 for farmers, for example. And I don't know whose
12 responsibility that would be -- if it's the NOPs or
13 Michelle's -- wonderful Michelle.

14 CHAIR POWELL-PALM: Thank you.

15 MS. RUNDE: But great idea.

16 BOARD MEMBER SMITH: Thanks, Alice.

17 MS. RUNDE: Thank you.

18 BOARD MEMBER SMITH: Okay. David Gould, you are
19 up, and then Andy Boone, Nicole Dehne.

20 MR. GOULD: All right. Thanks, Kyla. Thanks
21 NOSB for hearing my comments. In terms of affiliations, I
22 have a bunch. I'm only going to name two of them today
23 because I have two comments. My second comment will be with
24 my affiliation as the secretary of the IFOAM seeds platform.
25 My first affiliation is just me as a person who's worked in

1 the organic sector for the past 30-plus years, inspecting,
2 certifying, accrediting, training multiple certifiers in
3 about 50 different countries. And I want to talk about a
4 grower group certification because I know there's been a lot
5 of discussion about it. There's been a lawsuit; there's
6 been an amicus brief. And I am a very strong proponent of
7 group certification. I think it's a great way to include
8 more farmers, get more product moving, really causing some
9 transformation for people who can't afford an individual
10 certification.

11 But the concerns I would say that have been
12 raised are not incompletely unfounded. I -- in my
13 experience, in about five different continents doing this, I
14 often find that certification happens a little too soon, and
15 that there are more improvements that are needed. And this
16 is just in terms of integrity. There are a lot of
17 discussions that I think are conflating an issue of price
18 competition with integrity of the certification. And we
19 really need to keep those separate. The NOSB and the NOP
20 can talk about the integrity of the certification. Really
21 what's needed is a separate accreditation category. It's a
22 completely extra set of skills that the inspector needs to
23 do to -- in order to not only assess farm performance, but
24 the management system for it. And this has been done -- the
25 IOAS has done it for organic accreditation under the IFOAM

1 program. It's not a huge extra bureaucratic burden, but it
2 would bring a lot more attention and rigor and regularity to
3 how well these kinds of certifications are done.

4 My second point is about excluded methods and the
5 disruptive massive wave of new gene edited varieties that
6 are on the horizon or that are coming. Generally, what I
7 would say is these are very inadequately regulated and we
8 need to bring some more pressure by the NOSB onto the USDA
9 at large to support the integrity of the organic program, to
10 protect the organic sector from contamination by these
11 varieties, from the lack of transparency, and the lack of
12 ability to actually test for them.

13 I was actually going to give these comments in
14 person next week, but I've got to go do a witness assessment
15 of an organic inspector. And so Michelle was kind enough to
16 give me this slot. And I wanted to actually put this
17 document that I just put into the chat into your hands
18 physically. It is the risk protocol for new genetic
19 technologies that the IFOAM seeds platform has published.
20 It's basic good sense. It's about six-plus pages of the
21 kinds of questions that should be asked to governments when
22 they're regulating these kinds of organisms. So I encourage
23 you to read that, and I'll be there next week -- at least
24 some of it, to maybe answer some questions. In my last few
25 seconds, what I'd say is in order to get more organic seed,

1 we need more interdependence across the stream. And that
2 means probably somehow regulating it so that the downstream
3 actors have to actually demand organic seed. Thanks for
4 hearing my comments.

5 BOARD MEMBER SMITH: Thanks, David. I see a
6 question from Brian.

7 BOARD MEMBER CALDWELL: Thanks, David. We've all
8 been wrestling with this issue of genetic crops and sort of
9 like unlabeled or difficult to determine crops, whether they
10 are genetically modified or not. Do you see places -- and
11 possibly in Europe this is already happening -- of lists of
12 either approved or not allowed varieties? Is that something
13 that is happening, or is that something that people envision
14 happening?

15 MR. GOULD: It's a great question, Brian. It's
16 an enormous task because they're not well regulated. Only
17 certain things are commercialized, while a lot of things are
18 in development right now. We, as the seeds platform, have
19 started trying to track this as well. And actually, if you
20 go to our website there under work areas, there's a GMO
21 tracker page where we have come up with a group of well-
22 researched databases around the world. None of them are
23 complete, as far as we know. And we're also tracking with
24 our own list, just by our own intelligence gathering what
25 organisms are coming to market, which new varieties there

1 are. It's going to take actually a collective group effort,
2 because right now there are not really consistent
3 governmental or regulatory ways of monitoring these things.
4 And actually in our risk protocol, we make some suggestions
5 about what should be in those kinds of databases.

6 BOARD MEMBER CALDWELL: Thanks David

7 BOARD MEMBER SMITH: Thanks David.

8 BOARD MEMBER JOHNSON: Thanks for your comments,
9 David. You said at the end that the demand side is going to
10 be key in nudging the organic seed market. Do you have
11 thoughts about what we could do through regulation or
12 guidance to make sure that the whole supply chain is engaged
13 around commercial availability and organic seed?

14 MR. GOULD: I have some ideas, but I think it
15 needs a pretty broad discussion about it. One of the things
16 in my experience, what's happened with the seed sector in
17 general is that it's mostly left to the seed companies and
18 the farmers to figure it out and supply something and then
19 they're kind of left on their own. But really, as we've
20 heard before, if you have these downstream companies pulling
21 on the chain, they have a stake in it and they really need
22 to probably have some responsibility enforced upon them,
23 just like we put on farmers. Exactly how that works out,
24 I'm not really sure, but most of the discussions that I've
25 had with seed companies are, show us the money and we'll

1 give you the seed. There's not enough pull through in the
2 chain to actually provide the monetary incentive or the
3 resources necessary for breeders or for seed companies to
4 actually produce the seed. And this is actually a very
5 critical issue because what you're getting now is a whole
6 new generation of breeders who are coming, who want to make
7 a living and they can only do it through these kinds of
8 molecular breeding or gene editing technologies because
9 there's not the money there for it, but we can actually
10 provide that.

11 BOARD MEMBER JOHNSON: Thank you.

12 MR. GOULD: Not a complete answer for you. I
13 think it's a discussion really worth having though.

14 BOARD MEMBER SMITH: Amy?

15 SECRETARY BRUCH: Thank you, Kyla. David, thanks
16 for your time here today. You were mentioning about grower
17 groups and you had a lot of insight on those. I was just
18 wondering if you could touch on a little bit more of your
19 experiences with the role of the internal control system and
20 how do we prevent conflicts of interest? Because there is a
21 little bit of self-auditing that is occurring in these
22 grower groups. So I'd love for you to touch on that.

23 MR. GOULD: Yeah. It's a -- well, conflict of
24 interest is inherent in the whole system. Right? We pay
25 somebody to certify us. Right? So that's already there.

1 Right? And certifiers want to certify these groups because
2 they want to get more production in. And, quite frankly,
3 they don't want to lose a client sometimes by making it too
4 hard for them.

5 All right. And so when you look at an internal
6 control system, really what you're doing is you're -- the
7 internal control system is doing what the certifier does for
8 a regular farmer, except they're doing it for 500 or 1,000
9 guys. And what needs to happen is there needs to be a way
10 to really analyze whether they know -- you know, it's like
11 if I'm the inspector and I've got a few days to go and
12 inspect this grower group, right, it's not really possible
13 for me to know what's going on at every single farm, but
14 it's a relatively easy task, if I'm well-trained, to know
15 whether they know what's going on at every single farm. And
16 if they don't, that's a really -- that's a big red flag.

17 And so what you need to be able to do is assess
18 the control system to see how frequently are they going?
19 What are they actually checking on? And what are they doing
20 to remove the product from the stream of commerce that
21 doesn't comply. Right? It doesn't mean that everybody's
22 going to be perfect, but it means that if somebody is not,
23 that there's got to be a corrective action to keep them out
24 of the flow of the goods that we're calling organic.

25 In terms of the conflict of interest there, it's

1 really, I think, more of a question of do they have a proper
2 disciplinary system and can that be audited by the
3 certifiers inspector? If I'm going out -- when I'm going
4 out and I'm looking at the farms and see what's going on,
5 and maybe I'll do a few inspections myself, but really what
6 I'm doing is I'm watching them do it and making sure that
7 they're actually doing it in a way, which is covering all
8 the bases, which is -- which is really making tough
9 decisions. Right? Because if you find a grower group where
10 they say there's never any problems, that's also a red flag
11 because that's just not reality most of the time. But,
12 again, this is really more an issue of training the -- the
13 certifiers' inspector, and I don't think it's rocket
14 science. It's just a different area of -- of insight and of
15 attention that has to be paid to it.

16 And one of the things I think that also could be
17 considered, in terms of accrediting or looking at how this
18 is done, is not only in terms of sample size, but in terms
19 of how much time gets spent, or maybe even thinking about
20 having, you know, I dare say more than one inspector at a
21 time there. I know, I'm -- I sit on an accreditation
22 committee for another organization that accredits things
23 like the Forest Stewardship Council and things like that.
24 And it's pretty rare when you get only one auditor in one of
25 these situations -- you always have a team of them. So, I

1 mean, you know, certifying a 500, a thousand guys, that's a
2 big deal, and it should be a big deal.

3 SECRETARY BRUCH: Yeah. Okay. Thanks for your
4 insight there, David. I actually -- Kyla, I have one
5 question -- one additional one. Do we have time for that?

6 BOARD MEMBER SMITH: Quick.

7 SECRETARY BRUCH: Okay. Quick. Just wanted to
8 know again, just some insight on these grower groups. Is
9 there any risk to the actual producers in the grower groups
10 for limited market outlets? Are they -- could they be
11 oppressed just due to they only have one potential buyer, a
12 little bit of a monopoly-type situation? Are there concerns
13 there?

14 MR. GOULD: Well, there could be, but if it's a
15 well-run cooperative, it probably won't be an issue. And it
16 also depends on what it is they've got to sell. And then
17 there's also just the reality of it's a control issue.
18 Right? So if they're selling to too many places, then you
19 can't really control it and you have to, you know, sort of,
20 I think, make a -- you know, make sort of what the wise
21 decision is there.

22 Some of these they can sell often to a nonorganic
23 outlet. That's often a possibility as well, but there has
24 to be enough transparency and accountability, so you know
25 how much product is actually being produced and can, you

1 know, and can actually get to market. But in terms of the
2 fairness of it all, you know, it would be great if we had a
3 little more fairness, you know, integrated into the organic
4 systems. You know, you see a lot of these -- these grower
5 groups are also have a fair trade certification, and that
6 handles more of that. It'd be great if we did, but we
7 don't.

8 SECRETARY BRUCH: Thank you.

9 BOARD MEMBER SMITH: Thanks for your comments,
10 David.

11 Okay. Coming down to the end here, folks. We
12 have Andy Boone, Nicole Dehne, Heather Spaulding, Ben
13 Keller. And then I'll do -- that sort of rounds us out. I
14 believe I'll do one final call for other folks that we
15 missed earlier today.

16 But, Andy, if you could give your name and
17 affiliation, please, and then you can get started.

18 MR. BOONE: Thanks. Hello. My name is Andy
19 Boone and I work as a certification specialist at CROPP
20 Cooperative. We appreciate the work the NOSB and the NOP do
21 to support the organic agriculture. Thank you for your
22 opportunity to speak. CROPP supports the work the NOP has
23 done to create the Organic Integrity Database, also known as
24 OID. At CROPP, we are using this resource in our farm
25 certification development to update certificates and inform

1 our farmer database. This is helpful because we do not have
2 to reach out to certifiers or our farms for an updated
3 certificate.

4 For our processing facilities, we use OID
5 certificates to update issue dates on our master product
6 list and for non-branded bulk products. We use OID
7 certificates for Organic Valley branded products or private
8 labels. We combine the OID certificate with an addendum
9 from the certifier. It has made managing our organic
10 certificates easier, but with the need to get the addendum
11 from the certifier, it has not increased our efficiency.

12 CROPP has gratitude and appreciation for the OID
13 and hopes to see real-time certificate updates on the
14 database. This would enable more accurate routing of farm
15 milk pickup when hours count. Having to wait for an updated
16 organic certificate can cause financial loss for the farmer
17 and the milk buyer. We would like to see the NOP invest
18 more resources for improving the performance of the Organic
19 Integrity Database. We have had instances when a
20 certificate could not be retrieved because the database is
21 not functioning properly. Another example is consistent
22 issue date updating. In some cases, the issue date updates
23 when the document is downloaded, not the date the certifier
24 issued the certificate. An issue date that is constantly
25 updating devalues the issue date itself. At CROPP, we are

1 managing over 1,600 farms and 100 co-manufacturers. These
2 farms and businesses are certified by 30 different
3 certifiers, and many of our producers are in the plain
4 community, which creates challenges and timeliness that the
5 OID can help resolve by providing real-time updates when
6 certification decisions occur.

7 We believe the creation of the Organic Integrity
8 Database has been a significant improvement for the NOP and
9 Certified Organic Operations for Management of Organic
10 Certification. CROPP would like to see the Organic
11 Integrity Database continue to advance to better serve the
12 immediate needs and requirements of organic certification.
13 I want to thank the NOSB, the NOP, and the organic industry
14 for the time to speak. I'm happy to address any questions.
15 Thank you.

16 BOARD MEMBER SMITH: Thanks, Andy. Any questions
17 for Andy? Thanks for your time with us today, Andy.
18 Appreciate it.

19 MR. BOONE: Appreciate it.

20 BOARD MEMBER SMITH: Nicole Dehne, you're up
21 next, then Heather Spaulding, then Ben Keller. Nicole,
22 hello. Name and affiliation, and you can get started.

23 MS. DEHNE: Great. Thanks, Kyla. My name is
24 Nicole Dehne. I'm the director of Vermont Organic Farmers.
25 We are a certification agency owned by the nonprofit NOFA

1 Vermont. We represent close to 730 organic producers all in
2 Vermont. And, of course, I want to thank the NOSB and the
3 NOP for all of your hard work. But I'd like to comment
4 today on risk-based certification. I know a lot of
5 certifiers are interested in this topic. VOF is very
6 supportive of the NOSB's efforts to consider what it means
7 to develop this risk-based assessment approach. We're also
8 very supportive of moving away from this idea that
9 certification needs to be a one-size-fits-all.

10 The subcommittee was looking for specific
11 feedback from certifiers regarding what resources are needed
12 to help us implement these concepts, so here are my
13 suggestions. I am in favor of developing definitions for
14 terms like risk-based oversight, risk management, and risk
15 vulnerability. Having more clarity around those definitions
16 are going to help the industry apply those concepts
17 uniformly. However, it is also critical, I feel, to allow
18 individual certifiers to create our own risk criteria that
19 reflect the specific vulnerabilities that are inherent with
20 the producers that we certify. So creating definitions that
21 are broad but outlining objectives of the work would be the
22 most helpful to us, I feel, at this part of the process. In
23 addition, in order for a certifier to successfully adopt a
24 risk-based oversight approach, it's going to be critical to
25 train NOP auditors to similarly allow and adjust for

1 certification policies that work with low-risk producers.

2 So investing in resources to train NOP auditors is going to
3 be required to ensure that these certifiers don't get
4 written up for developing these risk-based approaches.

5 And then, finally, I think organic education
6 should also be an important tool in discussing how to
7 address risk, so we're going to get better compliance if
8 producers are following the regulations because they believe
9 in the value of the practices. So I just want to do a shout
10 out to the Transition to Organic Partnership Program. It's
11 a really great example of the USDA supporting this type of
12 education. The Farmer-to-Farmer Mentorship Programs across
13 the U.S. are doing a great job helping to educate farmers
14 and some processors about the benefits of organic practices
15 and helping farmers to achieve organic certification, which
16 is key. For us, we've even been able to add a new position
17 with support from this funding to assist producers in
18 successful adoption of organic certification and practices.
19 So it's been great. The vast majority of our farmers in
20 Vermont wholeheartedly believe in organic farming. They'd
21 be doing the practices, whether certification existed or
22 not, but a lot of them struggle with record keeping. We
23 don't want to lose those growers just because they align
24 with the practices the most. Right? So reducing their
25 record keeping burden will help them stay. And I just want

1 to commend the NOSB for pushing this agenda item and for
2 continuing this very important work. Thank you.

3 BOARD MEMBER SMITH: Thanks, Nicole. I
4 appreciate your written comments as well as these comments
5 today. Any questions for Nicole? I see a hand from Mindee.

6 VICE CHAIR JEFFERY: Hi, Nicole. Thank you for
7 your written comments, and I have to apologize. I'm having
8 some technical difficulties. Can you hear me okay?

9 MS. DEHNE: Yeah, I can hear you.

10 VICE CHAIR JEFFERY: Great. So in your written
11 comment, Vermont Organics expressed a cautious support for
12 the compost proposal, and it centered around the language
13 of. We suggested that adding plant and animal material and
14 anything that's on the national list as an allowed synthetic
15 feedstock. And from the perspective of your written
16 comment, it seemed like you all found something of a
17 liability to opening the door there. And I was wondering if
18 you could unpack that nuance a little bit, because sometimes
19 when you're writing, you're writing what you might think is
20 a protection for the national list, but it could be read as
21 opening the door on the national list. So I was wondering
22 if you could help me understand the nuance of what you saw
23 there in the language.

24 MS. DEHNE: Sure. I think for us, the logic
25 was, right now, the only synthetic that's listed is

1 newspaper, and the description of compost feedstock doesn't
2 seem to include a general allowance for synthetic. So I
3 appreciated what the NOSB was trying to do and create a
4 formal process for reviewing synthetic feedstocks for
5 compost. So that made sense. I was just a little wary of,
6 like, will this be interpreted as a, hey, you know, here's
7 an open door for synthetic ingredients. I agree, there's a
8 process set up for reviewing those ingredients, those
9 synthetic ingredients. So that was my cautious, like,
10 acceptance of the definition.

11 VICE CHAIR JEFFERY: Totally makes sense. Thank
12 you.

13 BOARD MEMBER SMITH: Okay. I don't see any more
14 hands. Thanks, Nicole. Appreciate it.

15 MS. DEHNE: Thanks, everybody.

16 BOARD MEMBER SMITH: Heather, you are up next,
17 then Ben Keller. Hi, Heather, you can give your name and
18 affiliation and then get started.

19 MS. SPALDING: I'm sorry. I tried to unmute.
20 Can you hear me? Yeah. Okay. Great. Thank you. Good
21 afternoon. My name is Heather Spalding. I'm deputy
22 director of the Maine Organic Farmers and Gardeners
23 Association, MOFGA. We're a broad-based community of
24 stakeholders working to transform our food system by
25 supporting farmers, empowering people to feed their

1 communities, and advocating for an organic future. We
2 certify 543 organic farms and processing operations, and we
3 have more than 15,000 members. We're also a member of the
4 National Organic Coalition.

5 I just wanted to touch on four topics: compost
6 feedstocks; plastics; so-called inerts; and standards for
7 greenhouse container and hydroponic production. On compost
8 feedstocks, we appreciate the proposal, and we believe that
9 compost feedstocks should only be plant and/or animal
10 products. We appreciate your delineating updates for time
11 and temperature requirements and separating them from the
12 discussion about compost feedstocks. We would not support
13 any further additions of synthetic materials as organic
14 feedstocks. I do understand what you're trying to do and
15 open to more discussion about that. But we definitely are
16 concerned about many of the synthetics that could be
17 contaminating our compost, particularly PFAS.

18 Regarding the extent and impact of plastic use in
19 organic production, we shouldn't throw up our hands and
20 accept it as a fact of modern living or an inevitability in
21 future organic production. Though plastic is ubiquitous in
22 most organic production and handling, we must work quickly
23 to find safer and truly sustainable materials that don't
24 rely on fossil fuels or industrial chemicals that are
25 harmful to human health and the environment. The widespread

1 contamination of farmland from PFAS is an acknowledged and
2 serious problem in U.S. ag, and it underscores the
3 importance of taking a precautionary approach to materials
4 that we introduce into the environment. We must not allow
5 plastics to proliferate and further contaminate our precious
6 and finite agricultural soils the way that PFAS has.

7 Regarding inert or ingredients in organic
8 pesticide products proposal, we strongly support option one,
9 which would list individually each inert ingredient allowed
10 for use in organic pesticide formulations on the national
11 list. This would ensure fulfillment of OFPA criteria for
12 evaluating both the environmental and human health impacts
13 of synthetic substances and the necessity to organic
14 production. Requiring transparency in listing inerts will
15 encourage manufacturers to choose inerts that pose less harm
16 to human health and the environment. And again, we're very
17 concerned about the prevalence of PFAS generally in the
18 pesticides industry and the likelihood of PFAS lurking in
19 materials approved for organic production.

20 And finally, regarding standards for greenhouse
21 container and hydroponic production, we oppose allowing
22 soilless systems for organic crops, other than seedling
23 sprouts and microgreens. Thank you.

24 BOARD MEMBER SMITH: Thanks, Heather. Any
25 questions for Heather? Don't see any.

1 BOARD MEMBER CALDWELL: Jerry's raising his hand.

2 BOARD MEMBER SMITH: Sorry. Okay, Jerry, I can't
3 see all the people. And so like, if you don't raise your
4 hand, I got like a -- go ahead, Jerry.

5 BOARD MEMBER D'AMORE: I have a very simple
6 question. Where does -- does a comma fit in that greenhouse
7 container hydroponics? What is it that you're objecting to?

8 MS. SPALDING: We oppose allowing the soilless
9 systems for organic crops, other than seedling sprouts and
10 microgreens. We want to ensure a level playing field for
11 all certifiers and producers. So I think that has been
12 established, a comment that we've shared multiple times.
13 But --

14 BOARD MEMBER D'AMORE: Yeah, I just have a --
15 excuse me for the interruption. I just have a hard time
16 figuring out if you're isolating greenhouses or something.
17 Are greenhouses part of the mix of what is not wished for?

18 MS. SPALDING: No. No. It's the soilless
19 systems --

20 BOARD MEMBER D'AMORE: Okay.

21 MS. SPALDING: -- is the focus.

22 BOARD MEMBER D'AMORE: Okay. And then, how do
23 you -- if I may, how do you justify the exceptions made for
24 the microgreens, et cetera? I mean, how did that come
25 about? How can one explain it?

1 MS. SPALDING: Yeah. The -- I have to -- I will
2 have to give you a clearer answer on that. I'll follow up
3 in writing for that. But the product sense -- yeah, I'm
4 sorry. I can't answer that.

5 BOARD MEMBER D'AMORE: Thank you very much. I do
6 appreciate that.

7 BOARD MEMBER SMITH: Another question from Brian.

8 BOARD MEMBER CALDWELL: Hi, Heather. Thanks for
9 your comments. I think I'm going to ask you another hard
10 question. And I know that Maine has certainly been on the
11 front lines of issues with sort of inadvertent contaminants
12 with PFAS and sewage sludge. How can we think about inputs
13 to organic compost that come from conventional systems that
14 may have things like pesticide residues or et cetera, et
15 cetera? How do we frame that, in terms of the whole
16 discussion?

17 MS. SPALDING: Yeah. I think we generally need
18 to be looking at all kinds of -- all the feedstocks. And I
19 know that what you're saying is that there are plant and
20 animal conventional feedstocks that are approved that could
21 potentially be contaminated. We know we live in an impure
22 world. What we do want to avoid is opening it up to even
23 more synthetics that are not fully tested. And I think that
24 that is -- you know, that's the finessing that the NOSB is
25 potentially trying to do as an alternative consideration for

1 next spring, where there may be some synthetic materials
2 that are on the list that could be considered.

3 I -- we have firsthand experience, you know -- as
4 you said, Maine is at the forefront of trying to address
5 PFAS contamination. We, MOFGA, have firsthand experience
6 with contamination of compost after trying to do the right
7 thing by not allowing plastics to be used in a massive event
8 that we have each year. We really strive for zero waste
9 with the Common Ground Country Fair. We -- after testing
10 our compost, we did find elevated levels of PFAS, and we
11 pinpointed the source of that being compostable dinnerware.
12 And we took the compostable dinnerware out of the system,
13 meaning we still felt like it was the best available option
14 to us for the food vendors at our event to use, but we
15 didn't allow it to go into our compost. And then our
16 compost testing came back with non-detect for PFAS.

17 So we know that there are -- so I guess it's just
18 an example of let's not continually allow more and more
19 synthetic products. And when we -- you know, unless we know
20 that they are free of contaminants such as PFAS. And so
21 they're really -- we need to have a much more precautionary
22 approach to this. And, yeah, I mean, it's -- we need to
23 find out more about what is going into the feedstocks from
24 plant and animal materials, but I don't have a definitive
25 answer on how to address that right now. I mean, there

1 are -- our farmers have limited fertility options compared
2 to conventional producers, and we recognize they need
3 compost and they need animal manure.

4 BOARD MEMBER CALDWELL: Heather, thank you so
5 much. I know I kind of put you on the spot there, but I
6 really appreciate you sharing this. We're struggling with
7 the same issues and sharing some of the struggles and
8 results that you've had in Maine. So I really appreciate
9 you, you know, thinking about that and helping us with it.

10 MS. SPALDING: Uh-huh.

11 BOARD MEMBER SMITH: Amy. Short.

12 SECRETARY BRUCH: Yeah, thanks, Heather. Just a
13 quick question. PFAS, you mentioned that. I'm starting to
14 become aware that there are some remediation measures to
15 remove PFAS and water and different things. I'm not aware
16 of remediation in the soil. Is there anything that you
17 could tell the board about any innovation there to help
18 farmers that have contaminated soil, or is there no
19 solutions yet?

20 MS. SPALDING: No solutions yet for the soil.
21 There is research being done on different crop -- cover
22 crops to uptake PFAS from the soil, and also potentially to
23 put materials into the soil like biochar that can bind PFAS.
24 But it is impractical really to think that you can get --
25 that you can clean up the soils dramatically at this point.

1 The research is just ongoing.

2 And so our -- you know, our logic really is that
3 we have to turn off the tap. We have to stop spreading
4 sludge and making the problems worse. We have to stop using
5 PFAS in materials and agricultural chemicals and try to
6 protect the soils that have not been contaminated and not
7 irrigate or fertilize with water that's been contaminated by
8 PFAS or sludge or other materials that have PFAS in them.

9 BOARD MEMBER SMITH: Thank you, Heather.
10 Appreciate it.

11 SECRETARY BRUCH: Thanks, Heather.

12 BOARD MEMBER SMITH: Okay. I think our last
13 commenter today is Ben Keller. Ben, I heard you're on the
14 phone. Are you with us? Maybe try star six.

15 MS. ARSENAULT: Thank you, Kyla. I was just
16 about to say that.

17 BOARD MEMBER SMITH: I'm going to read these
18 other names real quick just to make sure we don't have
19 anybody. Ben, if you are out there and can try to, anyway,
20 let me just read these questions, Carl -- or these names:
21 Carl Block, Trevor Gruber, Eric Klein, Joel Layman, Lee
22 Morberg, Paul Hoffman and Eric Balkin. Any of you are out
23 there, you need to make yourself known right quick. And I
24 think I'm going to have to call it, if we can't get you
25 unmuted. I am sorry. We tried to get you back in the queue

1 here.

2 Okay. Let me find my things I'm supposed to read
3 now. Sorry. Okay. This concludes our public comment
4 Webinar for today. Thanks to everyone who provided comments
5 to the board today. We will reconvene on Thursday,
6 October 17th at noon Eastern. And I think that does it.
7 Thanks, everybody, for sticking with us. And we'll see you
8 maybe on Thursday.

9 MS. ARSENAULT: Thanks, Kyla. Thank you,
10 everyone.

11 (Whereupon, at 5:36 p.m., the Webinar was adjourned.)

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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2024 PUBLIC COMMENT WEBINAR

PLACE: ZOOM

DATE: October 15, 2024

was held according to the record, and that this is the
original, complete, true and acc which has
been compared to the recording a *Elaine M. LaRosee* hearing.

Elaine M. LaRosee, CDLR
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE
NATIONAL ORGANIC PROGRAM
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
FALL 2024
PUBLIC COMMENT WEBINAR

Thursday,
October 17, 2024
12:01 p.m., EST
Day 2

1 National Organic Standards Board (NOSB) Members

2 Kyla Smith, NOSB Chair

3 Amy Bruch, NOSB Vice Chair

4 Nate Lewis, NOSB Secretary

5 Brian Caldwell

6 Jerry D'Amore

7 Carolyn Dimitri

8 Kim Huseman

9 Mindee Jeffery

10 Allison Johnson

11 Dilip Nandwani

12 Logan Petrey

13 Nate Powell-Palm

14 Franklin Quarcoo

15 Wood Turner

16 Javier Zamora (absent)

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USDA/National Organic Program Staff
Erin Healy, Division Director of Standards (Webex)
Jared Clark, Assistant Standards Director
Andrea Holm, Agricultural Marketing Specialist, Standards
Heather Kumar, NOSB Technical Support Staff
Michelle Arsenault, Advisory Committee Specialist,
Standards Division

P R O C E E D I N G S

(Time 12:01 p.m.)

1
2
3 MS. ARSENAULT: Hi everyone. I've just opened up the
4 waiting room and started admitting people into the meeting, so
5 everyone should be transitioning into our meeting room Now.
6 and I'm going to turn off the waiting room, so from now on
7 folks will just join directly into the meeting with us, And
8 they will enter on mute with their cameras off.

9 Welcome folks. we've got one minute after the top of
10 the hour here, and we're going to get started. It looks like
11 we've got 71 people on the line with us, including all the
12 Board members and some NOP staff, so I think we're ready to get
13 started here.

14 So welcome back from the comment webinar on Tuesday.
15 We're reconvening here Thursday morning for the second part of
16 the oral comment webinar. Thank you for joining. We have the
17 second webinar today will be until about 5:00 p.m. Eastern. We
18 may run a little bit late. We ran a little bit late on
19 Tuesday, if you weren't with us.

20 We have a slide presented on screen, and if you're on
21 the phone only, I'm going to go ahead and read through some of
22 the instructions for those folks. So attendees, you're going
23 to be muted and unable to unmute yourself. So but the chat is
24 enabled, so you can chat with each other and relay any
25 technical difficulties to NOP. So chats are part of the public

1 record and are not a public comment. So please do chat amongst
2 yourselves, but the Board won't be answering any questions that
3 happen to come through in the chat.

4 Closed captioning is available in Zoom by clicking
5 more on the right side of your Zoom taskbar. You can control
6 your own view and font size, or if you don't see the closed
7 captioning at all, you can turn it off. Please do not use the
8 raised hand feature. All commenters had to register ahead of
9 time and will be called on in turn by the Board chair.

10 Customize your own view. If you go to the upper
11 right-hand corner to the view button, you can rearrange what
12 you see on your personal screen, and you can toggle between
13 gallery view, speaker view. You can also click exit full
14 screen when you share a slideshow so it doesn't take over your
15 entire screen. And no worries, changing your own personal
16 screen won't affect anybody else's screen -- anyone else in the
17 meeting.

18 Andrea and Jared are working behind the scenes
19 spotlighting speakers and the speaker timer for everyone, so
20 that should remain on your screen no matter what view you're
21 using personally. And if you're having technical problems,
22 please visit support.zoom.us. And honestly, if you are having
23 some problems, if you just log out of the meeting and then log
24 back in, it usually fixes itself -- unplug it and plug it back
25 in.

1 We'll have a transcript which will be posted on the
2 NOP website as soon as it's available after the in-person
3 meeting concludes next week.

4 All right. Speakers, please make sure that your name
5 is displayed in your video tile so we can locate you when it's
6 your turn to speak, and so we can make sure that you can get
7 your mic unmuted. You should be able to rename yourself by
8 clicking the participant list, then next to your name, you'll
9 see more. Or you can do that in your video tile as well
10 under the ellipsis, the three dots. Do keep an eye on the chat
11 box. If you're scheduled to speak and you can't find your name
12 in the list of participants, we may send you a note in the chat
13 box to confirm that you are actually online.

14 All right. As I mentioned, Andrea Holm and
15 Jared Clark are behind the scenes projecting slides and helping
16 speakers mute and unmute themselves. So we will ask you to
17 unmute yourself when you're called, and you can keep your
18 camera on or off if you want. It's optional. You don't have
19 to be on camera. Both the mic and camera icons or widgets are
20 on the bottom left of your Zoom taskbar and also next to your
21 name in the participant list as well. If you're on the phone
22 only and don't have a mute button on your phone, you can hit
23 star six and that toggles between mute and unmute.

24 Once Kyla calls your name, please come to the mic and
25 state your name and affiliation for the record at the start

1 your comment, and then I'll start the timer. And each
2 commenter has three minutes to speak, and once you're done,
3 once you reach your three minutes, the timer will sound. And I
4 am going to test the volume of the timer now, and then
5 eventually it will be on my camera pinned to the screen so
6 you'll also be able to see it counting down. So four, three,
7 two, one. (Timer alarm rings) I've got some thumbs up so it
8 sounds like everybody can hear it all right. Excellent.

9 All right. Now, I'm going to turn the mic over to
10 Erin Healy, the Director of the Standards Division, for
11 welcoming remarks.

12 Erin.

13 MS. HEALY: Thank you, Michelle. This is a
14 continuation of our two-day public comment webinar, so welcome
15 back to those who attended on Tuesday and welcome to anyone who
16 is new and attending today. We're grateful to be able to
17 participate virtually so people can participate from wherever
18 they are. We saw on Tuesday farmers on their tractors doing
19 work and able to participate via phone camera, so this is
20 really nice to have that participatory process be accessible to
21 all.

22 I did this on Tuesday and would like to do it again.
23 I do want to acknowledge the devastation from the recent storms
24 and fires, and we recognize the challenging work of organic
25 farmers in this changing climate, and our thoughts are with

1 anyone who was impacted.

2 After today's webinar, we will reconvene in person
3 next week in Portland, Oregon, and we plan to live stream that
4 meeting as we did last spring, and all of the meeting
5 information, as Michelle mentioned, is going to be posted on
6 the NLSB meeting page on the USDA website.

7 This meeting, like all of the meetings of the
8 National Organic Standards Board, will be run based on the
9 Federal Advisory Committee Act and the Board's Policy and
10 Procedures Manual. Kyla Smith, our Board Chair, will
11 facilitate this session.

12 And I want to remind everyone that this is an open
13 and transparent process, so we do ask everyone to be respectful
14 of each other and avoid any personal attacks. This does extend
15 to the chat messages as well. So you may disagree with
16 someone's position, but please be sure to be respectful and
17 give them the same grace that you would want if you were
18 commenting.

19 And now I'll hand the mic back to Michelle who will
20 do a roll call. Have a great meeting. Thank you.

21 MS. ARSENAULT: Thanks, Erin. I appreciate it. And
22 Erin, if you don't mind, I'm just going to mention to folks
23 that I know Erin's not going to join us in Portland, so if you
24 had important things to say to her at the in-person meeting,
25 she won't be there.

1 MS. HEALY: But I'll be online, so I won't mind
2 (simultaneous speaking).

3 MS. ARSENAULT: Yeah. Thanks, Erin.

4 All right. Now I'm going to do a roll call, mainly
5 to test your mics, camera, make sure everything's working.

6 And for the record, Kyla Smith.

7 CHAIR SMITH: I'm here. Hello, everybody.

8 MS. ARSENAULT: Welcome, Kyla.

9 Amy Bruch?

10 VICE CHAIR BRUCH: Good morning from the Heartland.

11 MS. ARSENAULT: Good morning.

12 Nate Lewis.

13 BOARD MEMBER LEWIS: I am present.

14 MS. ARSENAULT: Hello, Nate.

15 Brian Caldwell.

16 BOARD MEMBER CALDWELL: Hello, everybody.

17 MS. ARSENAULT: Hey, Brian.

18 Jerry D Amore.

19 BOARD MEMBER D AMORE: Good day to all.

20 MS. ARSENAULT: Hello, Jerry.

21 Carolyn Dimitri is going to be joining us. She was
22 going to be a little bit late, and I don't see her on the line
23 with us just yet, but she will be here.

24 Kim Huseman.

25 BOARD MEMBER HUSEMAN: Hello, everybody.

1 MS. ARSENAULT: Hi, Kim.

2 Mindee Jeffery.

3 BOARD MEMBER JEFFERY: Good morning.

4 MS. ARSENAULT: Good morning, Mindee.

5 Allison Johnson.

6 BOARD MEMBER JOHNSON: Yeah, good morning.

7 MS. ARSENAULT: Good morning, Allison.

8 Dilip Nandwani.

9 BOARD MEMBER NANDWANI: Good morning.

10 MS. ARSENAULT: Good morning, Dilip.

11 Logan Petrey.

12 BOARD MEMBER PETREY: Hello, present.

13 MS. ARSENAULT: Hello, Logan. Welcome.

14 Nate Powell-Palm.

15 BOARD MEMBER POWELL-PALM: Good morning. Present.

16 MS. ARSENAULT: Good morning, Nate.

17 Franklin Quarcoo.

18 BOARD MEMBER QUARCOO: Present.

19 MS. ARSENAULT: Hello, Franklin.

20 BOARD MEMBER TURNER: Good morning. Hi.

21 Good morning, Wood.

22 All right. Let the record reflect that Javier is
23 absent.

24 Now, I'm going to hand the mic off to Kyla Smith,
25 Chair of the National Organic Standards Board, to kick us off.

1 Kyla.

2 CHAIR SMITH: Hello, and welcome back, or just
3 welcome if you weren't here with us on Tuesday. I just wanted
4 to follow up with the sentiments shared by Erin here earlier,
5 and also she had some statements on Tuesday, and I also
6 acknowledge some of the devastation due to natural disasters
7 that some of our community are experiencing.

8 And so I just wanted to remind folks, because I
9 forgot, and shame on me -- but that within the organic
10 regulations there is a mechanism to temporarily deviate from
11 certain regulations that may have been impacted on your
12 operation due to the results of a natural disaster. So these
13 allowances are outlined in the regulations at 205.290, the
14 Temporary Variances section. There is also an instruction
15 document in the program handbook, I believe it's NOP 2606.

16 So certified operations must engage in this process
17 in consultation with their certifier, and ultimately approval
18 is given by the National Organic Program. Not all regulations
19 are allowed to be deviated from, so definitely check out the
20 regulatory text and connect with your certifier. But this
21 could be a resource to aid those who are in these impacted
22 areas, so I just wanted to mention it that there is this
23 resource to provide some additional aid in compliance with the
24 regulations or lack thereof due to the natural disasters.

25

1 Okay. Back to our regularly scheduled program. I'll
2 start with some general reminders, and then we will get
3 started.

4 Just a reminder that in our policy and procedures
5 manual, there is a policy about public comments. It is
6 displayed on the screen. All persons who will be recognized
7 signed up during the registration period. Persons must give
8 their names and affiliations for the record at the beginning of
9 their public comment. Proxy speakers are not permitted.

10 Individuals providing public comment shall refrain
11 from making any personal attacks or remarks that might malign
12 the character of any individual, entity, or organization.
13 Members of the public are asked to define clearly and
14 succinctly the issues they wish to present before the Board.
15 This will give NOP members a comprehensible understanding of
16 the speaker's concerns.

17 I will call on speakers in the order of the schedule,
18 and we'll announce the next person or two so they can prepare.
19 Please remember to state your name and affiliation, and then
20 we'll start the timer, and I'll remind folks of that throughout
21 the day.

22 Board members will indicate to me if they have
23 questions for the speaker, after they're done, so again don't
24 immediately go off camera or go away, and I'll call on Board
25 members to ask questions if they have them. So again, Board

1 members, helpful if you use your Zoom hand because it like pops
2 up a notification that I can see, but I know that some folks
3 were having problems with that on Tuesday, so just yell out at
4 me if I don't see your regular hand. Only NOSB members are
5 allowed to ask questions.

6 And then at the end of the day, I will do a sweep for
7 any speakers that we missed throughout the day. We did this on
8 Tuesday, didn't result in any speakers, but we'll keep doing
9 that process. As opposed to trying to sweep them up throughout
10 the day, we'll just do one sweep at the end.

11 Okay. So our first speaker will be Adam Seitz.
12 After Adam, we have Harriet Behar, and then Charles Benbrook.

13 Adam, are you with us?

14 MR. SEITZ: Here.

15 CHAIR SMITH: Perfect. Name and affiliation, and you
16 can get started.

17 MR. SEITZ: Good deal. Good morning and afternoon.
18 Adam Seitz here. I serve as a Senior Technical Reviewer and
19 Policy Specialist for Quality Assurance International, an NSF
20 International company and a leading provider of organic
21 certification services worldwide.

22 Thank you NOSB and NOP, as always, for your efforts
23 and the opportunity to comment. You all took on a lot of hard
24 topics this go-round, and I'm going to do my best to comment on
25 a few, but please see our written comments on additional

1 topics.

2 I'm compelled to comment on at least one material, so
3 much easier than defining risk. Nutrient, vitamins, and
4 minerals. QAI supports the concept of retaining the current
5 listing with the Subcommittee's noted explicit option to
6 exclude materials by annotation should the need arise. This is
7 a good solution to the backstory on the current listing.

8 On to risk. I'll start by saying certifiers have
9 always implemented risk-based certification in one form or
10 another, in deciding what inspector to send to an operation,
11 what reviewer to assign, inspection report format, or what
12 questions to include and the likes. Certifiers like QAI have
13 been continuously learning, formalizing, and improving our
14 risk-based certification practices.

15 I checked our document control system this morning to
16 see when we implemented our original formal risk assessment
17 matrix, or RAM, and it looks to be around 2017 or so. This
18 matrix has evolved since then to capture our overall assigned
19 operation risk, audit complexity, and label review risk. We
20 use these risk levels as a factor in selecting operations for
21 additional inspections, unannounced inspections, residue
22 sampling, and sometimes depth of review.

23 We even implement risk-based approaches in reviewing
24 inputs. A cool feature of our risk assessment practices is
25 that we don't just rely on the output that our risk assessment

1 matrix spits out. We rely on the expertise of our
2 certification staff. We validate the assessments continuously
3 and have the ability to override the risk scores if needed. I
4 don't click the magic certified button for any new or renewal
5 clients that come my way without reviewing their RAM and making
6 sure it jives with the inspection report and the points our
7 incredibly competent team of reviewers issue.

8 Let's say an operation put together a minimal, fairly
9 passing organic fraud prevention plan, given the scope of their
10 operations, or just barely put together an accessible
11 corrective action for identified noncompliances. Well, we may
12 just override our RAM's output and qualify the operation as
13 high risk. Just one example of how we apply risk on the fly.

14 A key in this discussion is that risk-based
15 certification is needed, and it needs to continuously evolve.
16 Certifiers can think critically about creative ways to
17 implement risk-based certification practices, and we need to
18 feel supported by the NOP in doing so. It's a complex
19 ecosystem, though, and I'm honestly not certain what that
20 support should look like. I mean the NOP putting out detailed,
21 defined criteria for certifiers to apply in implementing risk-
22 based certification sounds great, but it also puts the playbook
23 in the hands of potential fraudulent operations.

24 On the other hand, certifiers operating independently
25 creates discrepancies in the certification process that can be

1 exploited. It can also disrupt certified operations if we need
2 to make a 180 turn from something we've been doing because we
3 learn our stance is not acceptable during accreditation audits.

4 And that's it, but just want to put out a quick plug
5 for the ACA as a good vehicle to move this forward.

6 CHAIR SMITH: Sorry for the tech things there if that
7 was in your ear. Thanks, Adam.

8 Any questions from Board members? I see one from
9 Allison.

10 VICE CHAIR BRUCH: Thanks for your comments, Adam,
11 and starting with my favorite topic of this meeting, nutrients,
12 vitamins, and minerals.

13 Do you know if you have clients who are using any
14 materials under that listing that might fall into a gray area,
15 and thoughts about how that grayness should or shouldn't be
16 resolved? Thinking like BHA and things like that particularly
17 are in a tricky spot.

18 MR. SEITZ: Yeah, I mean, I don't actually think it's
19 particularly gray given the current interim instruction. I
20 think I expressed previously, I think at QAI we try to be
21 pretty conservative in what we permit. Like we review things
22 in detail to make sure they're being used for fortification
23 purposes and are above board, and we don't necessarily allow
24 what we would qualify as an accessory nutrient in every product
25 type.

1 So there are nutrients that I think fall into that
2 like clear accessory nutrient consideration that's been
3 outlined extensively in the proposed rule and interim rule, and
4 we do allow a lot of them -- not all of them -- try to
5 implement or enforce like what the NOSB recommendations were on
6 those. And I think the best way to keep tabs on those is
7 market surveillance, see what's in the marketplace, and go to
8 the grocery store and take a peek. A lot of these things
9 you'll see out there.

10 CHAIR SMITH: Thank you.

11 Dilip?

12 BOARD MEMBER NANDWANI: Thanks, Adam, for your
13 comment. Very simple question. You know, some vitamins, they
14 come from genetically modified or excluded methods, you know,
15 the sources. So do you know any testings available to identify
16 that they are ingredients or sources from these kinds of
17 prohibited methods available to the stakeholders or the
18 consumers?

19 MR. SEIRTZ: Yeah, I can't personally speak to the
20 tests that are on the market now for things like that. I mean
21 this isn't a test per se, but something I like to use sometimes
22 is looking at patents available online to see how things are
23 produced, especially if it's something that is trademarked, or
24 very clearly there's a single product on the market.

25 It doesn't speak to the testing per se but a lot of

1 times for things like these expressed previously, we rely as a
2 certifier on attestations from manufacturers. Also our
3 knowledge of things looking -- you know, we test those
4 statements sometimes, looking things up, like I said, patents
5 and whatnot. But yeah, not certain about the reliability or
6 availability of tests on that front.

7 BOARD MEMBER NANDWANI: Thank you. That's helpful.

8 CHAIR SMITH: Nate?

9 BOARD MEMBER LEWIS: Hey, Adam. Can I ask you about
10 L-malic acid?

11 MR. SEITZ: Sure, yeah.

12 BOARD MEMBER LEWIS: All right. I noted in QAI's
13 comments that you all agree with the classification decision
14 that fermentation of synthetic fumaric acid equals a synthetic
15 L-malic acid. And my curiosity is around whether that
16 classification decision sets any precedent that we may not be
17 aware of related to classification or related to the review of
18 excluded methods within the context of fermentation products.

19 MR. SEITZ: It might set a precedent but, in my
20 opinion, probably in a good direction. There's a lot to be
21 resolved on the classification front. It's not entirely clear-
22 cut. I think in a comment that we submitted a good while ago,
23 we kind of suggested a means to test fermentations and whether
24 or not they result in a synthetic or non-synthetic outcome as
25 far as like what are the synthetic inputs used for, like the

1 overall metabolism of the organism or the substrate for the
2 enzyme, even? Or is it like a direct action, like this enzyme
3 is acting directly on the synthetic substance to produce this
4 thing.

5 So like it might be setting a precedent. I'm not
6 aware of any immediate fallout that would occur from this
7 change though.

8 BOARD MEMBER LEWIS: Okay. Fair enough. Thank you
9 very much.

10 CHAIR SMITH: I have a question -- seeing no one else
11 -- about risk. Thanks for your comments about that. And I was
12 curious because most of your comment talked about doing extra
13 things for high risk operations, and so I didn't know if you
14 guys did any lesser things for low-risk operations.

15 And I know it's all relative, so relatively if those
16 low-risk operations aren't having those extra things then like,
17 yes, they're having less things. But again, as explained in
18 the discussion document, I think certifiers are good at like
19 going from here to here, but maybe not as good from going from
20 here to here, and so I didn't know if you had any comments
21 about what that could look like.

22 MR. SEITZ: Yeah. In practice, I don't think we
23 really do reduce -- currently -- I don't think we really do
24 reduce our baseline expectations of what operations need to
25 demonstrate to us. I think we should and we could. I think

1 that -- I mean we do things that make obvious sense. For
2 example, for a broker -- a virtual broker, you know, not making
3 the inspector respond to sanitation questions, obviously not
4 applicable.

5 But as far as opportunities, I think that there is
6 some opportunity for how we decide to interpret 205.403(a),
7 really all of the section with regards to inspections and
8 exactly what inspections look like. You know, looking at OFPA
9 as well, like I review OFPA -- maybe I maybe look at OFPA like
10 once every two months to peruse what could be an interpretation
11 of something, and just looked this morning on the inspection
12 front. And with regards to annual inspection, OFPA says a
13 program established under this chapter shall provide for annual
14 on-site inspection by the certifying agent of each farm and
15 handling operation that has been certified under this
16 operation.

17 Doesn't say what that on-site inspection has to look
18 like, what it has to cover, what it has to verify. Obviously,
19 we know the regulation goes into some details on that front,
20 especially at 205.403(a), and more or less says we need to
21 verify everything on inspection, you know, the full OFP, which
22 is everything the operation does, but it doesn't say how we do
23 that.

24 You know, in things across certification we have
25 varying methods of verifying things, attestations from

1 manufacturers being an example -- not saying we should accept
2 an attestation from a certified operation that says, yes,
3 everything's compliant, and did not do an inspection, an on-
4 site inspection. But I think there's maybe some leeway for
5 interpretation on that front, if we had support and consensus,
6 to truncate inspections when it makes sense for low-risk
7 operations.

8 And not necessarily even with the goal of making the
9 inspection short. It could be with the goal of being able to
10 focus on certain things during inspection such that the
11 inspector doesn't have to be concerned with checking every
12 single box in the inspection chart, like I verified this, this,
13 this, this, this. And so that could be applied to low-risk
14 operations and high-risk operations, but in some cases it may
15 make sense to reduce inspection times, not cover everything.

16 CHAIR SMITH: Oh. Okay. Yeah, thank you so much.
17 Yeah, appreciate it. Okay. Thank you, Adam. I don't see
18 anybody else.

19 MR. SEITZ: Yes. Thank you very much.

20 CHAIR SMITH: Okay. Well, I m moving on to, yep,
21 Harriet Behar, then after Harriet is Jennifer Walker, and then
22 Michael Kleinhenz.

23 Harriet, hello, good morning or afternoon. Name and
24 affiliation, and you can get started.

25 MS. BEHAR: I m Harriet Behar with the Organic

1 Farmers Association, and a former NOSB member. Organic farmers
2 depend on strong, clear standards to protect organic integrity,
3 resulting in fair competition and a meaningful label in the
4 marketplace.

5 Compost. The definition of compost should not be
6 expanded to include synthetics even if they are on the national
7 list. We have learned from the conventional use of biosolids
8 that, even after transitioning the land to organic, PFAS can
9 continue to persist.

10 The negative impacts of nano and microplastics in our
11 food, soil, and water is just now being understood. There is
12 no shortage of high-quality compost made from plant and animal
13 materials. Compost should not include synthetics due to long-
14 term negative consequences

15 Methionine. We recognize the importance of DL
16 methionine for organic poultry until the marketplace provides a
17 natural source of this amino acid. DL-methionine helps to
18 lessen the production of ammonia indoors when there are high
19 concentrations of birds.

20 Since the indoor and outdoor stocking rates and
21 outdoor access rules from OLPS will not be fully effective
22 until January 2029, we feel it is premature to change the
23 current methionine annotation which at this point helps to
24 lessen high concentrations of birds indoors.

25 Seed. The threat of gene-edited seed creeping into the

1 use on organic land is real, and one way to prevent this is to
2 increase the use of organic seed. Price is not the main reason
3 farmers choose seed varieties. Organic seed breeders include
4 characteristics geared to organic production systems.

5 The NOP and NOSB should increase their focus on
6 organic seed use through encouraging on-farm trialing to
7 determine equivalent varieties between organic and non-organic
8 seeds. Setting up a live database to aid organic farmers in
9 choosing organic seeds as well. The U.S. may want to follow
10 the EU model of requiring some varieties, but we are not there
11 yet.

12 Meloxicam. There needs to be a TR to have a broad
13 allowance as currently proposed. The fact that residues can be
14 found in milk or meat, and that there are human sensitivities
15 to meloxicam, shows the need for T&R to then build a clear
16 annotation for each species and age of animal. Since this is
17 an off-label use, there is concern that various veterinarians
18 would recommend different withdrawal times, resulting in
19 inconsistent use.

20 Inerts. Option 1 is the only viable path for inerts.
21 Relying on outside agencies to determine the allowed materials
22 in organic is problematic, and does not meet the OEFFA. Inerts
23 are not all benign, and should be individually reviewed.

24 CHAIR SMITH: Thank you, Harriet.

25 I see a question from Nate.

1 BOARD MEMBER LEWIS: Hey, Harriet. Thank you.

2 MS. BEHAR: Hi.

3 BOARD MEMBER LEWIS: Good to see you. I had a
4 question about your compost comments. Is it accurate to infer,
5 then, that you would not support the continued allowance of
6 synthetic paper in compost, because synthetics are already
7 allowed in compost, paper is the one, and so I m just trying to
8 make sure I understand.

9 MS. BEHAR: Yes.

10 BOARD MEMBER LEWIS: I want to be clear about what
11 OFA or Harriet supports on that front.

12 MS. BEHAR: Yes, and over time we have seen during
13 sunsets that newspaper has become more and more problematic.
14 And so I really -- and the fact that there is more and more
15 polymers in newspaper, yes, we do not support newspaper to
16 remain as a compost feed stock.

17 We just really feel that we don t know all the long-
18 term impacts, but we do have some knowledge that the more and
19 more polymers that are put into the soil, the harder and harder
20 it is to remove them and to prevent them from getting into our
21 food and water.

22 BOARD MEMBER LEWIS: Okay. Thanks for clarifying.

23 CHAIR SMITH: Allison Johnson.

24 BOARD MEMBER JOHNSON: Thanks for your commentary.
25 You packed a lot in there.

1 On meloxicam, so the lack of TR is something I've
2 been giving a lot of thought, and our PPM doesn't require a TR
3 if we have enough information in the petition. Can you say
4 more about what you think we might discover if we were to do a
5 TR?

6 MS. BEHAR: Yes. I think that there are -- there's a
7 significant issue with the residues in milk and meat, and that
8 was brought up in the petition that it has been found. And if
9 you look more into the human health impact, which a TR would
10 cover, that there are people who are sensitive to meloxicam. I
11 don't know at what levels that might be found, but organic
12 farmers are very concerned that we are giving our consumers a
13 product that could now possibly harm them, and as we know, a
14 lot of the people who buy organic food are chemically
15 sensitive, allergic to many different things, immune
16 compromised.

17 We just feel like this keeping it to under 12 months
18 of age for dairy calves is the best place right now. We want
19 to expand it to more animals. In my research online, I found
20 that even postpartum dairy cows have higher concentrations of
21 meloxicam in their milk than those that are more like mid-
22 lactation. So there's a lot of, as far as withdrawal times,
23 for allowing the product to then be put into the organic
24 stream. I think there's a lot more nuances there that is not
25 covered by the current annotation.

1 BOARD MEMBER JOHNSON: Do you think residue testing
2 that's normally done on milk and meat would help catch those
3 residues, or you're worried that it would slip through?

4 MS. BEHAR: Well, I'm a little bit concerned too that
5 leaving it up to the veterinarian to discuss the withdrawal
6 times is problematic because this is off-label use. There
7 isn't any specific guidance to them -- I mean, yes, five days
8 here, eight days there -- but I would like to see it in the
9 organic regulation so if someone doesn't follow the withdrawal
10 time that it's actually then a noncompliance to the organic
11 reg.

12 And I think being clear to the producers what those
13 withdrawal times might be is important. And, again, we
14 shouldn't be leaving the organic rules for a material left to
15 another agency. We should have it clear in our regulations so
16 producers and everyone understands what the withdrawal time
17 would be for all the different species.

18 And I looked online. I spent quite a bit of time in
19 Europe and Australia and New Zealand. I mean it's used all
20 over, and it's different in different places. So that's why I
21 think the TR could bring that in because they can see a lot
22 more scientific -- you know, I don't have a million
23 subscriptions that they do to be able to actually see a lot of
24 the detailed information on this.

25 BOARD MEMBER JOHNSON: Thank you.

1 CHAIR SMITH: Amy?

2 VICE CHAIR BRUCH: Thanks, Kyla.

3 Harriet, thanks for joining us today. Hi. Thanks
4 for the written comments that you helped submit, and these oral
5 ones.

6 I had a question on the on-farm trials of seed that
7 you mentioned. I saw this throughout several written comments
8 from different people. How do we optimize the information
9 exchange between these seed varieties and these trials without
10 putting such an economic burden on farmers? I know from some
11 of my contracts, I would have to have a separate bin for each
12 variety that I would grow in a trial, and that is challenging
13 in and of itself.

14 And also, I did see some written comments talk about
15 the economic burden of buffers that organic farmers have to
16 already put forth in their farms. So we're already reducing
17 our actual farmable acres due to buffers, and those buffers
18 make sense to me, but to set aside acres for these on-farm
19 trials seems another economic burden against producers. The
20 information is definitely necessary, but what ideas do you have
21 to optimize that information flow that's not all sitting on a
22 farmer's plate?

23 MS. BEHAR: Well, first of all, we're not expecting
24 the on-farm trial to be like a university trial. So as far as
25 the Organic Seed Alliance has an excellent little one-page

1 thing that farmers, you know, you could even just buy one bag
2 and put it on the edge and look at it. And then throughout the
3 season, you know, how well did it germinate? Did it canopy
4 early? You know, I mean, whatever it would be, I'm thinking
5 about like corn or soybeans, you know, a row crop. But even in
6 vegetables, what are the characteristics that you see and that
7 then you can then compare it to the other.

8 So I mean we're trying - I mean, the use of organic
9 seed is really one farm at a time. So we're trying to get
10 farmers to then see on their own farms what is going on. And
11 as an organic inspector, I saw that when farmers did buy
12 organic seed, they had, you know, oh, nothing could ever be
13 better than my Pioneer variety, and then they all of a sudden
14 started buying from Albert Lea or Blue River or whatever -- I'm
15 in the upper Midwest -- and they found that these were really
16 good varieties. But until they were pushed, they couldn't --
17 you know, so they trialed out a bag or two, and then they saw
18 how good they are, and then they just went 100 percent to the
19 organic seed.

20 So organic farmers don't just decide that they're
21 going to buy seed based on price. They need to know about the
22 characteristics. Then over time we could have, you know, at
23 the organic conferences, farmers could come and be on a panel
24 and talk about the various things that they trialed and what
25 worked and didn't work. I mean there's a lot of ways to get

1 the information out there.

2 But the risk for getting gene edited and even other
3 GMO into organic is just getting bigger and bigger over time,
4 and so we really need to think about supporting organic seed
5 producers that are giving us the varieties that we need, and
6 figuring out a way to help farmers choose those organic seeds.

7 VICE CHAIR BRUCH: Thank you for that. And one brief
8 follow-up. I know you mentioned about production of organic
9 seed, and I know OFA has a crop insurance working group. One
10 thing that probably should be a focus would potentially be
11 insurance on the production of organic seed. Are you familiar
12 with -- I know we talk crop insurance and the challenges with
13 organic producers -- but are you aware of some of the
14 challenges with organic producers producing organic seed and
15 the even less coverage that's available? Are you familiar with
16 some of that as well?

17 MS. BEHAR: I am. As an organic inspector, I visited
18 many farms that were growing organic seed, and, yes, there are
19 challenges, right? I mean you can usually then sell your crop
20 as a livestock feed product or whatever, but you've definitely
21 lost the major premium that you've put all that management
22 into, right, to have a high-quality seed.

23 So that is something that is on our list for talking
24 with RMA about seed production, and it wouldn't just only be
25 for the row crop commodities. You know, it's at the vegetable

1 and even fruit, and when we talk about seed I want to mention
2 too that we're talking also about tree fruits and brambles and
3 all those things that we want to have organically.

4 And they are cloning fruit trees. I mean, there's a
5 lot going on in genetic engineering across the whole food
6 system, and unless we really step up and try to push, like they
7 are doing in Europe. I mean, they pretty much said the clock
8 is ticking, everyone. We're going to start using 100 percent
9 organic seed, right, by 2030, whatever it was.

10 VICE CHAIR BRUCH: Makes sense.

11 MS. BEHAR: We don't have that pressure on our
12 production, but we have the pressure from the outside with
13 genetic modification kind of pushing us that this is the way we
14 need to go.

15 VICE CHAIR BRUCH: Thanks, Harriet. Appreciate it.

16 CHAIR SMITH: Mindee, do you still have a question?
17 I'm sorry, your little hand's not up anymore. Okay.

18 Nate.

19 BOARD MEMBER POWELL-PALM: Hi, Harriet.

20 MS. BHEAR: Hi, Nate. Did you enjoy the pie?

21 BOARD MEMBER POWELL-PALM: Loved it. I'm ready for
22 the next one.

23 MS. BHEAR: I'm won t be here in Portland, so no pie
24 this time.

25 BOARD MEMBER POWELL-PALM: So a few questions on

1 meloxicam for you. To kick it off, why have you not raised the
2 same NSAID concerns about flunixin, which is also an NSAID?

3 MS. BEHAR: Well, because in what I have seen, there
4 are more issues with sensitivity with the meloxicam. And I
5 actually just yesterday talked with a neighbor who spent
6 30 years working in a veterans hospital, and he was saying that
7 meloxicam was one of the least-given drugs because there were
8 so many side effects they found for people. There was a lot of
9 stomach issues. And so I just feel like with a TR, we'd have
10 more information.

11 BOARD MEMBER POWELL-PALM: And what information would
12 that tell us? That they're allergic, what do we do with that?

13 MS. BEHAR: Well, there would be, what would be the
14 withdrawal times for --

15 BOARD MEMBER POWELL-PALM: Oh, so let me -- and I
16 apologize for I'm going to cut you off several times throughout
17 this, just to keep things moving. So are you aware of the
18 Animal Medical Drug Use Clarification Act, MDUCA?

19 MS. BEHAR: Yes, I am.

20 BOARD MEMBER POWELL-PALM: And are you aware that a
21 veterinarian will lose their license if they're caught with any
22 residue in milk or meat?

23 MS. BEHAR: Well, yes.

24 BOARD MEMBER POWELL-PALM: Zero.

25 MS. BEHAR: But the veterinarian is not the one

1 letting the milk into the tank. They are not standing there
2 for five days and making sure that the animal is kept separate.

3 BOARD MEMBER POWELL-PALM: But it's their license on
4 the line.

5 MS. BEHAR: Yes.

6 BOARD MEMBER POWELL-PALM: So if they come in hot,
7 that's license. So they're going to be very concerned about
8 how that withdrawal period is administered, and they're able to
9 use FARAD to understand -- sorry the Food Animal Residue
10 Avoidance Database -- to understand what is that zero percent,
11 and maybe let's double it from there.

12 So I guess my fundamental question for you is, are we
13 a community that values science and professionalism, or are we
14 a community that only looks to tinctures?

15 MS. BEHAR: No, we want to have science, but we also
16 want transparency and clarity in the rule because the farmer's
17 not going to be looking up that on the internet --

18 BOARD MEMBER POWELL-PALM: No, they're going to be
19 told by the veterinarian whether that --

20 MS. BEHAR: They're going to be told by the vet, but
21 I think that we need to have the information in our regulation
22 to have it be available.

23 BOARD MEMBER POWELL-PALM: And it will be during the
24 rulemaking process. We are not stopping here after we vote yes
25 or no on meloxicam. We are then going to have an entire

1 rulemaking process where the folks who are most in charge of
2 this, FDA, are going to weigh in heavily.

3 MS. BEHAR: Right.

4 BOARD MEMBER POWELL-PALM: And so I'm sort of stuck
5 on why we would think that a faculty board would be the ones to
6 basically be given more power and onus than someone who spent
7 decades going to school, practicing, and has taken an oath to
8 make sure that they prevent pain and suffering in animals. Why
9 are we not giving them more of the benefit of the doubt?

10 MS. BEHAR: I want to see it in the annotation,
11 then --

12 BOARD MEMBER POWELL-PALM: Okay. Which will come
13 from the rulemaking process.

14 MS. BEHAR: Well, I'm not sure that the annotation
15 really should be coming from the NOSB, and that annotation
16 should be based upon a technical review that you've had. Like
17 I found that postpartum cows, it retains higher residues than a
18 mid-lactation cow. I mean that is a nuance that is not present
19 in the current annotation.

20 BOARD MEMBER POWELL-PALM: I appreciate that. So I
21 was wondering, does pain in cows stop at one year old?

22 MS. BEHAR: No, they do not, and I am fine with
23 expanding the use of meloxicam as long as it's clear in the
24 annotation what the withdrawal times are for milk and meat due
25 to the human sensitivities.

1 BOARD MEMBER POWELL-PALM: All right. Thanks, Kyla.

2 CHAIR SMITH: Yeah. Okay. Thanks, Harriet. I
3 appreciate your time.

4 MS. BEHAR: And that's OFA's position too. We're not
5 against meloxicam. We just don't feel that it's been clearly
6 annotated to the detail that we need to protect organic
7 integrity.

8 CHAIR SMITH: Thank you.

9 Okay. Up next, we have Jennifer Walker, then
10 Michael Kleinhenz, and then Kristopher Klokkenga,

11 DR. WALKER: Oh, am I there? Okay.

12 CHAIR SMITH: You are here. Yep. Name and
13 affiliation, and you can get started.

14 DR. WALKER: Great. Thank you so much. Good
15 afternoon. Thanks so much for letting me weigh in here. My
16 name is Dr. Jennifer Walker. I'm the co-founder and chief
17 animal welfare officer of Kinder Ground. This is a fund for
18 good, and we grant funds to the farming community to improve
19 the welfare of farm animals.

20 I m a veterinarian by trade, I was a dairy vet before
21 returning to school for a Ph.D. in epidemiology. Prior to
22 Kinder Ground, I spent the last 15 years managing milk quality
23 and food safety and animal welfare for milk processors,
24 including Horizon Organic.

25 I think you've already heard compelling and I think

1 astute testimony specific to the veterinary perspective from
2 Dr. Kerman (ph) and Dr. Biagiotti on meloxicam. I'd like to
3 focus my input from the perspective of a milk buyer and
4 processor, and my relationship and work with marketers and
5 legal and all of that goes within milk processing as it relates
6 to some of the questions and concerns I've heard so far.

7 So with the concern of why now and can it wait for a
8 different process, I'll argue that simply put, consumers expect
9 it, and quite frankly the law demands it. I don't think it can
10 wait. While we may be willing and happy to carry on the work,
11 the reality is that every day we don't get this sorted out
12 there will be cattle that will have to endure more pain than
13 they should.

14 It has to be noted that I believe that part of the --
15 or it has been noted -- that part of organics consumer appeal
16 is the belief that organic animals have better welfare. I
17 wouldn't want folks to risk that intention being questioned.

18 So consumers expect us to get this right. And I
19 think, at least from my experience, the potential legal
20 exposure of any company today accused of greenwashing or humane
21 washing really demands that you get ahead of it because there
22 are certain folks that are trying to leverage that avenue when
23 claims are made and, again, I think it's a key part of the
24 organic principles.

25 Residues. So what about residues? Can we trust the

1 data? I think others on this call can attest, if they know me,
2 to my militant and uncompromising position when it comes to
3 quality and food safety. We have rules. We have data on
4 meloxicam, and we can trust it. Whether we can trust the folks
5 who use it is no different for meloxicam than it is for any
6 other drug, including aspirin, including Banamine.

7 We can certainly trust actually the data more than we
8 have the data on aspirin, and I'll let the next speaker address
9 that who's far more qualified than I am on the pharmacology.

10 But everybody should be aware that, as of this week,
11 the FDA has made it very clear that aspirin is actually simply
12 not legal to use in cattle. So that's a big change. As of
13 this week, aspirin is a no-go. Why not all livestock? While I
14 would love it to be the case, this goes back to the data. We
15 simply don't have the data to inform the practice in other
16 species. Yes, it should be done, and I hope when we get there
17 you'll be able to add that on there, but it really shouldn't
18 hold up the prevention of treatment in species for which we
19 have solid data to inform safe and effective use.

20 Just under five.

21 CHAIR SMITH: We did it. Thanks, Jennifer.

22 I see a question from Nate Powell-Palm.

23 BOARD MEMBER POWELL-PALM: Thank you so much for your
24 comments and being here today, Jennifer.

25 Could you speak a little bit more to how you see the

1 animal welfare -- basically the claims organic can make about
2 animal welfare and how meloxicam plays into both our duty for
3 care of animals, but also the tools that we have. Do we have a
4 sufficient toolbox right now to say that we actually put animal
5 welfare first?

6 DR. WALKER: I think it's an excellent question. So
7 I'll kind of address that from a few perspectives because,
8 again, I always look at this through a marketing lens, and I
9 spend a lot of time cleaning up websites to say, well, we can't
10 say that, we can't say that. And so I do think it is the ethos
11 of organic that we provide great care for our animals.

12 To be honest, I don't think it's any different for
13 conventional, right? I have never met a farmer -- I have yet
14 to meet the farmer who says they don't care, right, about their
15 cows, so I think that's universal. And whether it is
16 conventional or whether it's organic, it's critical to the
17 industry for consumers to trust in that belief in the farmers
18 that we try our best, we have a duty of care, and we try every
19 day to honor that.

20 To your point about the limited toolbox, that is our
21 struggle, right? So we are in -- farmers are in a unique
22 position in that we are raising animals for food, which ties
23 our hands in so much, because to your point about the
24 veterinarians, we have an oath. Our ultimate oath, we have a
25 duty and an oath, we take an oath to protect the welfare of

1 animals. And that same oath tells us we have to protect public
2 health, and we spend our lifetimes walking that line and
3 finding that balance.

4 And so our toolbox is limited, and that is why I
5 think in this case, having been kind of -- having the line of
6 sight and how this was brought up and the folks who did the
7 work, for folks who want more information, they did the work.
8 We have lots of information on it. And I think that challenge
9 is, and why I think we're so passionate about it is knowing we
10 have something in the toolbox that is safe, that works, that
11 works better than Banamine, that works longer than Banamine,
12 that is less traumatic to the calf to give them Banamine.

13 We look at this and think like what a shame to have
14 this tool that's ready to go, and we're going to use the old
15 screwdriver, right, the broken screwdriver. We're going to use
16 that, you know, when I have the better one that works. And so
17 I think that's the challenge.

18 And so I don't know that the -- I would say the
19 consumer expectation from welfare is probably heightened in
20 organic because it's just the ethos around it, and I think that
21 that's fair. Knowing that on the -- well, consider the animal
22 agriculture abolitionist side of things, they are fostering and
23 training future leaders in their space as lawyers to
24 specifically target these sorts of claims around care and
25 welfare.

1 So when you say we provide the best care, they're
2 going to scrutinize that, what does that mean? And if you have
3 organizations like the Bovine Practitioners, the farm program
4 -- which is the national standard, the low bar for animal
5 welfare in the U.S. -- they require pain mitigation. That's
6 the new standard. It will be enforced, right? And so if you
7 can't make sure that we can meet that, you kind of, you know,
8 you put yourself in a precarious position.

9 BOARD MEMBER POWELL-PALM: I can't thank you enough
10 for the thoroughness of the answer.

11 I'll kick it back to Kyla.

12 CHAIR SMITH: Yeah. Kim?

13 BOARD MEMBER HUSEMAN: Hi. I really appreciate your
14 comments today and the lens in which you are speaking from.

15 My question, so from a milk standard perspective,
16 I'll use my background of feeding livestock and testing feed
17 for things such as aflatoxin, and the sensitivity of feed
18 products, and if milk tests for aflatoxin, I know what happens
19 with that milk.

20 Can you tell me if - and I'm not the responsible
21 party if I sell something -- it's obviously up to the dairy to
22 ensure that that product is safe before they actually take it
23 out of the - or into a tank and out of a tank. If a product
24 does test for any kind of medicine or even an aflatoxin, let's
25 say, what happens to that milk?

1 DR. WALKER: Yeah. It would depend on where in the
2 process it's tested. So we have within meats and within milk
3 -- so it kind of depends on what you're talking about, so milk
4 specifically, if that's the question -- we have certain tests
5 that are what we would call rapid tests, and those are fairly
6 limited to certain types of drugs, mostly antibiotics.

7 There is a test that does include Banamine that's
8 used by some folks. Not very often, though. It's not common.
9 The majority of milk is merely tested for beta-lactams. The
10 majority of processors test for that one class of drugs. Some
11 processors, I know Danone, adds tetracycline and sulfas to that
12 as well. Nobody else is testing for Banamine or other things.
13 You can't test for aspirin. We don't have a test for that --
14 that I'm aware of - I mean, you'd have to do like high-powered
15 HPLC.

16 BOARD MEMBER HUSEMAN: It's not an industry standard
17 by any means though.

18 DR. WALKER: Yeah, it takes forever. And so but to
19 answer your question, if a farmer - and this happens, right --
20 so we'll get a call from a farmer that says, ah, a dead cow got
21 out, you know, or I think somebody may have treated a cow, and
22 they messed up or whatever. If they know that -- if they know
23 the drug or whatever, and we can test for it -- then we'll say,
24 okay, hold that, bring the sample in, we'll check it, right,
25 and we can do that. If they don't know, or if it's a drug we

1 can't test, then we'll say you have to dump it, and so they
2 will dump that on-site.

3 If it comes to the plant, and it goes through the
4 screening at the plant, whether it's for just basic quality or
5 whether it's for residue, if that milk tests positive for
6 residue, that's where the state gets involved. So then how
7 it's disposed of is when I stand back and be like I just do
8 what I'm told, so it s here's where you shall go, because the
9 state wants to make sure that that milk is not redirected.

10 So that one, just once we've called fouls, we have to
11 dispose of it in a way where we trace it, and the state
12 official says, yep, I'm guaranteeing you that that milk did not
13 enter the food supply. So there's a process that goes in that.
14 So once we sound that alarm, then the state officials get
15 involved. There's a longer process to it, but once we ring
16 that bell, we kind of stand at the ready and wait to answer
17 questions from the state and do as we're told.

18 BOARD MEMBER HUSEMAN: And there's revenue loss in
19 that environment, so there's teeth in the game along that
20 entire supply chain, I'm assuming.

21 DR. WALKER: Yes, for sure. Yeah. I mean, it
22 depends on the farmer. Sometimes, you know, I'll admit as a
23 processor, if a farmer was proactive and called us ahead, we
24 would often, you know, we d give them one chance a year and
25 say, okay, well, wait, we're not going to charge you for that

1 milk because you did the right thing. You called us. Good.
2 You saved us a load, and you saved -- you know. So we kind of
3 try to reward them for making a good call. Not everybody does
4 that, but generally it's a loss.

5 BOARD MEMBER HUSEMAN: Thank you so much.
6 I really appreciate your responses. Thanks.

7 CHAIR SMITH: Thanks for your comments, Jennifer.
8 Appreciate your time.

9 DR. WALKER: Okay.

10 CHAIR SMITH: Okay. Up next, Michael Kleinhenz, then
11 Kristopher Klockenga, and then Aaron Zimmerman.

12 Michael, do we have you? There you are. Hello.

13 DR. KLEINHENZ: Hello,

14 CHAIR SMITH: Name and affiliation, and you can get
15 started.

16 DR. KLEINHENZ: Yes, my name is Dr. Mike Kleinhenz.
17 I am a clinical associate professor at Texas A&M University in
18 Canyon, Texas. I am a dairy health veterinarian and also a
19 board-certified clinical pharmacologist with expertise in pain
20 management and analgesic drugs in food animals.

21 I'm here today to express my support for adding
22 meloxicam to the National Synthetic List for livestock. If
23 approved, this would improve the toolbox available to organic
24 producers available for pain mitigation in their animals.

25 So meloxicam is a non-steroidal anti-inflammatory

1 drug, and cattle has a COX-2 selectivity to it, so that means
2 it's more gastro-protective and things like that in our food
3 animal species compared to things like Banamine we know is more
4 COX-1, which leads to things like ulcers and abomasum, kidney
5 diseases, and things like that.

6 Meloxicam has been shown over and over again in
7 controlled clinical trials, as well as on-farm with thousands
8 of conventional animals getting it on a daily basis, it would
9 be a pretty safe drug at the doses that are routinely used and
10 put in the literature and used on farm and in my own practice.
11 We can say that meloxicam does provide analgesia for about 72
12 hours in younger calves and up to 24 hours in our older
13 animals. There's some age-related pharmacokinetics that are
14 there with younger animals having a longer duration of effects
15 with just one dose.

16 Additionally, there are FDA and USDA approved methods
17 for detection of meloxicam in meat and milk, similar to what we
18 have for flunixin. We do not have that for aspirin for meat
19 and/or milk, a way to detect that in any of those products.
20 Those require a special research-type level for aspirin.

21 It's an easy-to-use medication, so people want to
22 give it. It's not hard to restrain those animals. They
23 readily will take meloxicam tablets, or if we ever get an
24 injectable approved, it's pretty easy to give. I've used the
25 products out of Canada myself as well.

1 Other two products we have on the list, aspirin and
2 Flunixin, that are currently on the organic list. In my
3 opinion, they do not provide the level of analgesia that
4 meloxicam can provide. Flunixin maybe gets there, but it's
5 only for about 12 hours in calves and under 12 hours for older
6 animals, where our work in aspirin shows it does not have any
7 effect at very, very high doses. It also has a prolonged
8 withhold time in milk in those cattle, up to about five days,
9 based on some work we did recently a couple years ago.

10 So aspirin, additionally, the FDA just came out this
11 week and said, don't use it, it's not a drug, and so that puts
12 it, you guys organic now to one drug that we have available in
13 the toolbox An addition of meloxicam would be very, very
14 helpful.

15 CHAIR SMITH: Thanks so much.

16 I see you have a question from Nate.

17 BOARD MEMBER POWELL-PALM: Hello. Thank you so much
18 for your comments today.

19 DR. KLEINHENZ: Sure.

20 BOARD MEMBER POWELL-PALM: Really appreciate this. A
21 little bit of a higher-level question for you. In our
22 community, I like to think that we are very serious about the
23 scientific method and about the oath that veterinarians take.
24 With the MDUCA, for the off-label use of meloxicam, do you feel
25 like there would ever be a chance that you, your students, your

1 colleagues, any vet in America wouldn't take the obligation to
2 make sure that withdrawal times recommended are not so
3 sufficient that we would always come out with zero residue in
4 milk or meat?

5 DR. KLEINHENZ: I do not believe that. So the way
6 that withdrawals are developed, they're developed with human
7 safety at the most pinnacle of it. So a withdrawal is designed
8 to have that there would be 1 in 1,000 chance that that drug
9 would actually enter the market in a conventional system. So
10 if you extend that beyond like what was on a label or what's
11 been published in the literature, you're now at beyond 1 in
12 1,000. You're at 1 in 10,000 and whatnot. So there's a very
13 small chance that we would get to the point where it would be a
14 zero. We recognize meloxicam enters meat and milk. We know
15 how it enters the meat and milk, and so we would be able to
16 establish withdrawal periods that would be satisfactory, I
17 think, for everyone involved.

18 BOARD MEMBER POWELL-PALM: Thank you so much.

19 CHAIR SMITH: I see another question from Allison.

20 BOARD MEMBER JOHNSON: Thank you so much for your
21 comments. This has helped me with the whole spectrum of
22 meloxicam.

23 I'm trying to understand the relationship between the
24 FDA letter on aspirin and the comments that were talking about
25 an off-label use of meloxicam. Why is an off-label use of

1 meloxicam okay and aspirin is not?

2 DR. KLEINHENZ: So aspirin is a very, very old drug,
3 and when the FDA put regulations of animal drugs back in the --
4 I think it s the early 90s, they declared at that time aspirin
5 to be a generally regarded as a safe drug, and they didn't have
6 the appropriate data behind it for a grandfather label.

7 Some -- dexamethasone, lidocaine -- those are drugs
8 that had a grandfather label, and they are approved in what we
9 call new animal drug applications or abbreviated new animal
10 drug application drugs. So those have data for efficacy and
11 then some data for safety in those animals, as well as meat and
12 milk withdrawals that are established.

13 Because meloxicam is produced in an FDA facility and,
14 by FDA's view, is a drug, we can use that drug in an extra-
15 label drug use for animals. In the FDA's view, aspirin is not
16 a drug. It's not an approved drug. It's never -- there's no
17 -- I think there's maybe one approved formulation, so even
18 human aspirin has never been approved by the FDA. They just
19 always regarded it as a safe compound, essentially.

20 Where we know there are people who are sensitive to
21 salicylic acid, and Reye s syndrome is the name of the syndrome
22 who are. So that's why aspirin can't be used in an extra-label
23 manner because the FDA doesn't perceive it to be a drug.

24 So does that make sense? Where meloxicam is a drug,
25 we know what the molecule is, we know some safety on it, it's

1 approved in humans, small animals, and whatnot, so --

2 BOARD MEMBER JOHNSON: Okay. Yeah, that's helpful.
3 Thank you.

4 CHAIR SMITH: Amy?

5 VICE CHAIR BRUCH: Thanks, Kyla.

6 Thank you, Dr. Mike, for joining us, and all the
7 information that you exchanged with us today.

8 I just have a quick question on the withdrawal
9 periods. From your perspective, are the withdrawal periods --
10 do they vary with the different meat-producing animals? We
11 just heard from other public commenters that maybe we need to
12 get very granular with specific animals, so I was just hoping
13 you could touch on that real quick.

14 DR. KLEINHENZ: Yes, ma'am. So yes, it would be very
15 species-specific. So we know -- and there's some work we're
16 doing in our lab -- we know the withholds that are probably
17 needed for cattle are much longer than what would be needed for
18 sheep or goats. It's just the way those animals metabolize
19 those drugs differently.

20 For instance, for sheep, the current FARAD
21 recommendation for meloxicam is 15 days, where in cattle at the
22 same dose you'll get a recommendation of about 30 days. Our
23 lab is currently doing some work where we're looking at
24 meloxicam and goats for a meat withdrawal, and we're thinking
25 we'll probably be right around the 20-day mark is where we

1 target. We're still working on that data to really get a
2 number.

3 But it's very species-specific because cattle aren't
4 goats, and goats aren't sheep, and they metabolize the drug
5 differently, and you have to make sure you detect it in all the
6 edible tissues within those animals, and the way they deplete
7 those is totally different. So you'll have to be very granular
8 as to what species you're dealing with.

9 VICE CHAIR BRUCH: Thank you. I appreciate that.

10 CHAIR SMITH: Kim.

11 BOARD MEMBER HUSEMAN: Yeah, I'll try to make this
12 very quick. Thank you, Mike, for your comments. Coming from
13 the beef capital area of the world, I can imagine the amount of
14 not only dairy -- as that's become a huge increase in the
15 West Texas market -- but also the beef cattle aspect.

16 We've spoken a lot about dairy, and I really
17 appreciate you leaning in here on withdrawal period based on
18 species. Do you feel like an open two times the FDA withdrawal
19 period, does that blanket cover -- I mean I guess it gives at
20 least the allowance so you have to look at the species as it's
21 applicable to the writing.

22 DR. KLEINHENZ: Correct. So the current
23 recommendation for cattle I use -- the data I have I got from
24 kind of the original person who looked at this is 28 days -- so
25 for cattle, if you just double that you're at 56 days. That

1 would more than deplete what's in the system.

2 So as a pharmacologist, we say to get 99 percent of
3 the drug out of the body, you need 7 half-lives. And so with
4 the half-life of -- we know that 28 days is appropriate, so if
5 we wanted to get 99.99999 out of it, we need an additional five
6 half-lives, and for meloxicam, that half-life is roughly
7 24 hours. So you need an additional, you know, 10 days, and
8 you'd be well over what drug is left in that body. And the way
9 the drugs leave the system, it's kind of a linear curve, and so
10 if you extend that out further you'll approach zero in that
11 testing mechanism.

12 The FDA, for reference, where you find meloxicam, the
13 levels that are detectable and are published by the FSIS are
14 10 nanograms per gram or 10 parts per billion. So that's
15 roughly 10 drops of water in an Olympic-sized swimming pool.
16 It's not very much. And they are looking for it actively,
17 especially in the meat products, and salmonella as well. So
18 it's very small quantities, and they are actively looking for
19 it in conventional food systems.

20 BOARD MEMBER HUSEMAN: Okay. Thank you very much.

21 CHAIR SMITH: Thanks so much for your comments today,
22 Dr. Mike. Appreciate you being with us.

23 Okay. Up next, we have Kristopher Klokkenga, and
24 then Aaron Zimmerman, and then Valerie McKinney.

25 Kristopher, are you there? Hello. Welcome. Name

1 and affiliation, and you can get started.

2 MR. KLOKKENGA: Hi. Thank you very much. My name is
3 Kris Klokkenga, and I'm a farmer in Emden, Illinois. My family
4 and I farm about 1400 acres of row crop organics, organic corn,
5 soybeans, white corn, popcorn, and alfalfa.

6 In the past I worked for Archer Daniels Mill Company
7 in the oil seed processing industry in the United States. In
8 2008 I was asked to go and transfer to Ghana, West Africa, and
9 run a crush facility there, crushing shea nuts.

10 I wanted to speak with you today about the testing of
11 organic cargoes coming back into the United States that are
12 imported from abroad. I understand that, from what I read,
13 that your crops from Ghana and Togo are having some more maybe
14 some stringent testing put on them, and I'm happy to see that.
15 I'm glad that those things are coming about.

16 The last time I was in Ghana was eight years ago, and
17 so obviously things could have changed by then, but I did want
18 to speak to you about this idea of organic by default. And
19 maybe you would think that if you go to a developing country
20 that there wouldn't be the accessibility to fertilizers and to
21 chemicals, but there is. There's a chemical shop in every town
22 that farmers can have access to, and so I am concerned when you
23 come from a place like Ghana or Togo that it's very possible
24 that the beans that are coming from there or getting
25 transferred there may not be organic.

1 As a farmer, I want the full playing field to be
2 level or be even. I'm not looking for more stringent testing.
3 I'm just asking for equal testing to be taken, as we look at
4 the rules that we have to follow here in the U.S., that those
5 would apply.

6 Also, the people that are bringing in products from
7 abroad, there's a risk-based certification happening right now,
8 and I would just challenge you to -- that we can prioritize --
9 that if there are some high-risk places to go to, that we focus
10 on that as an industry, and just have a consistency in the
11 certification practices.

12 My experience in Ghana is this. I don't see that the
13 country - what I saw, I don't believe that the country can
14 produce vessel-sized quantities to be able to be shipped to the
15 United States. I've been in Togo. They had a thriving cotton
16 seed industry, and soybeans have taken over there. However,
17 again, I don't - when you look at infrastructure and how hard
18 it is for us to move things here in the United States, it's
19 even more hard for them to do that there. So it's also hard to
20 run a monoculture in a developing country, and I thank you for
21 your time.

22 CHAIR SMITH: Thanks so much for your comments.

23 I see Amy looking for her hand button. Amy, go
24 ahead.

25 VICE CHAIR BRUCH: Yeah, thanks, Kyla.

1 Kris, thanks for joining us today. I know you're in
2 the midst of harvest. I just wanted to ask you a question. I
3 know you also had farming operations over in Lake Volta area in
4 Ghana, and I just wanted you to highlight just briefly some of
5 the challenges for production. I know you farmed
6 conventionally over there, but some of the production
7 challenges that occurred on your farm compared to maybe your
8 Midwest, Illinois operations.

9 MR. KLOKKENGA: Production challenges are, number
10 one, getting seed in. So I mean if they're producing organic
11 - so, I was using a Pioneer seed -- just being able to import
12 a foreign seed is challenging.

13 Trying to mitigate pests is probably your biggest
14 problem that you have. How do you combat a corn borer
15 outbreak? There were no GMOs. Genetically modified corn, we
16 didn't grow that, it was just conventional corn. But still you
17 had an attack from a pest, how do you get that? You use
18 chemicals, you have to go and use an insecticide. And so from
19 what I saw there's a lot of - there's probably over-
20 application of fertilizer and pesticides as well from the local
21 standpoint because maybe they don't know how to mix the
22 chemicals, they just spray on whatever they want.

23 VICE CHAIR BRUCH: Thank you, Kris.

24 CHAIR SMITH: Kim.

25 BOARD MEMBER HUSEMAN: Hi, Kris. Thank you so much

1 for your comments to the Board today.

2 My question is more around the actual production of
3 soybean meal. We see that the majority of African import from
4 a continent standpoint is in the form of meal instead of beans,
5 and as a former crush plant operator, what kind of chemicals
6 were you using to extract the oil from the bean when you worked
7 in Ghana?

8 MR. KLOKKENGA: So I mean industry-wide, in the
9 United States and in Ghana, we use chemical extraction to
10 extract. We would crush a shea nut, and then we'd be left with
11 a shea cake, and the cake would still contain about 15 percent
12 oil in it, so you still want to draw out whatever you can to
13 get your oil out of there.

14 So broadly speaking, hexane is the most effective and
15 the most economical solution in chemical extraction. So if you
16 hear people - we had to use acetone in a shea fractionation,
17 and so I did use acetone -- but if you're finding - hexane is
18 the primary ingredient - is the primary solvent used for
19 soybean extraction.

20 BOARD MEMBER HUSEMAN: Okay. Thank you.

21 CHAIR SMITH: Thanks for your comments and being with
22 us today, Kris. Appreciate it.

23 MR. KLOKKENGA: Thank you.

24 CHAIR SMITH: Up next we have Aaron Zimmerman and
25 Valerie McKinney, and then Bradley McNeil.

1 Hello, Aaron. Name and affiliation, and you can get
2 started.

3 MR. ZIMMERMAN: Hi, everybody. Can you hear me okay?
4 Okay, great. My name is Aaron Zimmerman. Our farming
5 operation is Zimmerman's Incorporated in Northeast Nebraska.
6 We're a grain forage farming operation that grows yellow and
7 white corn, soybeans, alfalfa, peas, buckwheat, barley, and
8 wheat, all feed and food grade, depending on access to market.

9 The majority of our rotation is corn, soybeans, peas,
10 buckwheat, row crop, with the main share going to corn and
11 beans. We would love to grow more, but basically the limiting
12 factor is access to market. Bottom line around here in the
13 Midwest is corn and soybeans. If you want to find other
14 markets, you'll be shipping long distances, which is usually
15 cost prohibitive. While I don't have a solution for this, I
16 just wanted to bring it up as an area of concern, and there's a
17 willingness to grow different crops.

18 My main concern today that I want to talk about to
19 kind of echo what Kris was just talking about is this goes back
20 to imports and making sure that they adhere to the same quality
21 and purity standards that we American farmers do. Currently,
22 our cost of production is above what we can sell corn for.
23 It's been that way for some time, and it seems like there's no
24 light at the end of the tunnel. Last check, we were \$6 a
25 bushel from our farm. I'm not proposing tariffs or anything

1 like that. I just want an even playing field so we can have a
2 fair fight.

3 Organics are incredibly difficult to grow, and so,
4 again, there has to be a premium to justify the practice. I
5 always have said we're never going to go back to conventional,
6 but I will say at some point something will have to give, and
7 if I'm thinking it, I guarantee other producers are as well.
8 I just would hate to imagine a future where the majority, if
9 not all, grain supply in the United States is sourced from
10 outside countries because the local producers have been choked
11 out. That's really my only comment for today. I can answer
12 questions if you've got any.

13 CHAIR SMITH: Thank you so much.

14 I see Amy with her hand up.

15 VICE CHAIR BRUCH: Aaron, hi. Thanks for joining us
16 today. Appreciate your time.

17 I had a question. You mentioned about cost of
18 production. Can you just highlight on your farm -- I know
19 you're very innovative -- can you highlight some of the
20 innovation that you've implemented to get more efficiency out
21 of your cost per acre for production of organic commodities?
22 Can you just highlight a few of the advancements you've done?

23 MR. ZIMMERMAN: You know, it s kind of all -- it's a
24 lot of little things. Obviously, testing, not only the manure
25 and litter sources that you use, soil testing, the variable

1 rate based on, you know, we do grid sampling and whatnot so we
2 don't over-apply anything if we don't have to. Yeah, you know,
3 there's a saying if you're filling your kernels all the way out
4 to the end of your corn ear, you're leaving something on the
5 table, you need a little bit of tip back. That means you maxed
6 out what that plant can actually produce.

7 So, you know, and it s just little things like that.
8 Obviously irrigation is a huge component of what we're doing
9 out here because we're sandy soils, and so if there's no water,
10 it just doesn't go. So, yeah, we ll use variable rate
11 irrigation and drop-down nozzles to get the water in the canopy
12 to lessen the evaporation and whatnot.

13 VICE CHAIR BRUCH: Great. Thank you. Can you touch
14 a little bit on your no-till operation that you have with beans
15 and rye as well?

16 MR. ZIMMERMAN: Yeah. So we do something a little
17 bit unique with soybeans. Typically in organics it's going to
18 be 30-inch rows of soybeans, and you cultivate them about till
19 harvest. And we've kind of got a different way, and I guess I
20 can't call it no-till, but I'll call it minimum-till.

21 We basically use rye as a companion crop planted
22 simultaneously with the soybeans in the spring. Basically, we
23 do have to till up the corn stalks, for instance, from the year
24 prior to reset weeds to zero, plant soybeans and rye both at a
25 very high rate simultaneously, and it basically makes a swamp

1 of rye and soybean canopy that chokes out weeds that might be
2 trying to establish. And essentially, the rye gets lazy and
3 goes dormant come July, and then the soybeans take over that
4 canopy, and typically the soybeans actually kill off the rye.
5 If you have a good stand of soybeans, it'll kill off the rye.

6 And, you know, actually I'm not saying it's a perfect
7 practice. There are escapes, but that's what weed zappers are
8 for and whatnot. But it works really well. It saves a lot of
9 tillage.

10 VICE CHAIR BRUCH: Great. Thank you for highlighting
11 that. I just want to say thanks for your tenacity because I
12 know you've done that practice a few times, and I just found
13 out this year that it is an insurable practice, good farming
14 practice, that other organic producers can use, too, and it's
15 covered with insurance. So thank you. I appreciate that.

16 MR. ZIMMERMAN: Yeah, we actually worked with my
17 insurance agent to get that practice approved. A lot of
18 YouTube videos of what we were doing sent up to RMA and
19 whatnot, so it was a multi-year process, but it was neat to see
20 it finally got done.

21 CHAIR SMITH: Nate, go ahead.

22 BOARD MEMBER POWELL-PALM: Thanks for your comments,
23 Aaron.

24 Two quick questions. First, could you share what
25 your average corn and soybean yields are on your organic

1 ground?

2 MR. ZIMMERMAN: Anywhere from -- yeah, variable -- I
3 would say variable is probably a key word there.

4 BOARD MEMBER POWELL-PALM: Give us your high end.

5 MR. ZIMMERMAN: High end of expectation, probably
6 240, and that's just typically following an alfalfa crop. I
7 think year in-year out, you're probably in the 180 to 210, I
8 would say on corn. Soybeans, again, variable. This year we're
9 down, I would say, 50 to 60 bushel --probably 65 bushel stops,
10 yeah, which is exceptional in our neck of the woods for, you
11 know, I mean on top of organics.

12 BOARD MEMBER POWELL-PALM: Yeah. Would you say that
13 if the market were to recover, and you were able to get a price
14 that you were making money at, you would be interested in
15 adding more acres to your operation as organic?

16 MR. ZIMMERMAN: Oh, absolutely. Yeah, I mean that
17 goes without saying. I figured it out the other day, at 190
18 bushel corn, our break-even was about seven and a quarter.
19 Right now, like I said, you can sell for six, so it's ugly.
20 You know, the only one that s -- we're making a little bit of
21 money right now on the soybeans. I was able to forward
22 contract a decent contract for soybeans. But actually, the
23 best money maker right now is yellow peas, followed by
24 buckwheat, but that's another flaky market that isn't
25 necessarily available to us here in the Midwest. So we're

1 going to have a lot of buckwheat in the bin and just hope for a
2 market to open up later.

3 BOARD MEMBER POWELL-PALM: Well, thank you for taking
4 time during harvest to join us. I really appreciate your
5 insights.

6 MR. ZIMMERMAN: You bet.

7 CHAIR SMITH: Allison.

8 BOARD MEMBER JOHNSON: Thanks for your comments,
9 Aaron. You're at least the second farmer through this comment
10 period who has talked about wanting to bring in a greater
11 diversity of crops and then sort of being pushed back or pulled
12 back to soy and corn because of the markets.

13 And I know you said up front that you don't have a
14 solution, but I'm curious if you can speak to anything specific
15 that stands out about the corn and soy markets that have this
16 sort of gravitational pull, or some of the key pieces that are
17 missing for the other crops you'd like to bring in more of.

18 MR. ZIMMERMAN: Well, it's probably kind of like
19 fighting gravity. It's kind of it s the powers that be. It s,
20 you know, our entire ecosystem is based on feeding corn,
21 soybeans to poultry, cattle, and everything like that. I have
22 heard of some cattle producers feeding peas, which is neat.
23 I've never tried selling to them, though. I always go for the
24 food grade market when I'm doing peas because peas can be
25 brutal. They can reward you, like this year, we did great.

1 Most years you wonder why in the heck do I ever try peas? So
2 you go for that premium if you can get it, so food grade is
3 where that's at. Again, I wish I had more clever anecdotal
4 advice for what to do, but I just don't.

5 BOARD MEMBER JOHNSON: Okay. Thank you. Like
6 livestock is one big key piece in the puzzle as to what --1

7 MR. ZIMMERMAN: It really is. That's what's getting
8 fed is livestock.

9 BOARD MEMBER JOHNSON: Yeah. All right. Thank you.

10 CHAIR SMITH: Thanks so much for your comments,
11 Aaron. Appreciate your time.

12 Next up is Valerie McKinney, then Bradley McNeil, and
13 then Michael Huber.

14 Valerie, name and affiliation, and you can get
15 started.

16 MS. MCKINNEY: Okay. Hello. My name is
17 Valerie McKinney. I'm with Trece Incorporated. I would like
18 to express my support to add pear ester as a crop pesticide
19 material to the National List of Allowed and Prohibited
20 Substances including synthetic substances used in monitoring,
21 mating disruption, and control products.

22 As we all know, codling moth is a significant pest in
23 palm fruit, walnuts, and other crops. We've developed
24 monitoring lures, mating disruption, and control products,
25 based off a chemical known as pear ester. Pear ester is a

1 naturally-occurring chemical that you smell from Bartlett
2 pears. Pear ester is currently not on the list due to the fact
3 that it is a kairomone and not a pheromone. A kairomone are
4 chemical signals produced by plants or other organisms that are
5 detected by a different species, often insects.

6 We have incorporated this chemical into most of our
7 codling moth products. For monitoring, we have it in our lures
8 mainly because you can still detect codling moths flights
9 within orchards under mating disruption. The importance of
10 being able to track codling moths flight allows growers to
11 apply pesticides at problem timings. It makes it extremely
12 difficult to time a pesticide spray without proper monitoring.
13 Our monitoring lures have the pear ester either loaded into a
14 septa or PVC, and they never come in contact with the crop.
15 They are always housed in traps.

16 Our mating disruption products also have pear ester.
17 This is because it has been discovered that this kairomone
18 disrupts female codling moths. Our mating disruption products
19 allow for both male and female codling moth to be disrupted.
20 It should be noted that our mating disruption products are
21 housed in a solid passive dispenser system. Pear ester
22 diffuses from the solid dispenser as a gas.

23 We also have a flowable control product for codling
24 moths and codling moths larvae known as CIDETRAK DA MEC. This
25 product allows for the confusion of female codling moth and

1 larvae. It has been proven that the female codling moth will
2 lay their eggs 40 percent farther from the fruit or nut. This
3 makes it much more difficult for the larvae to find the fruit
4 or nut, causing it to be exposed longer to the pesticide.

5 The pear ester odor also confuses the larvae, causing
6 it to wander and even eat trichomes from the leaves. Again,
7 the larvae are exposed to the pesticide longer, increasing the
8 chance of mortality.

9 The amount used for our flowable is 0.41 fluid ounces
10 per acre. To give you an example, if a grower was to use a
11 500-gallon sprayer for one acre or even three acres, this is
12 only still equal to 0.41 fluid ounces per acre. With such a
13 small amount and a recommended use pattern, it is not expected
14 to pose an environmental risk.

15 The normal orchard background for pear ester was
16 found to be 3.712 grams per acre per month. Our six products,
17 registered with EPA at their maximum rate, do not reach the
18 normal background for pear ester except for one, which even
19 then is only 4.0 grams per acre per month, and it's normally
20 not used at the maximum rate, it's normally used at what we
21 call a moderate rate. Even at its maximum rate, it only
22 releases 0.288 grams per acre per month additionally.

23 Pear ester is an approved additive listed by the
24 U.S. Food and Drug Administration on everything added in the
25 food in the United States list. It is currently being used in

1 foods and in cosmetics. We feel that pear ester is a necessary
2 and invaluable tool for organic growers in the codling moth
3 management.

4 I will be at the in-person meeting if anyone has any
5 additional questions, and I'd like to thank you for your time
6 and consideration.

7 CHAIR SMITH: Thanks so much.

8 I see you have a question from Nate Lewis.

9 Nate.

10 BOARD MEMBER LEWIS: Thanks, Valerie. I appreciate
11 your comments. Does Trece make any other kairomone products
12 besides pear ester, or are there other kairomone we should be
13 thinking about as we evaluate this petition?

14 MS. MCKINNEY: There actually are. There's acetic
15 acid, there's Terpinyl acetate. These are other kairomones
16 that are being used. We currently can purchase them naturally.
17 The difference with DA, there's not really a natural source,
18 and economically it's very expensive.

19 BOARD MEMBER LEWIS: Great. Thanks for the
20 clarification. Appreciate it.

21 CHAIR SMITH: I don't see any other hands raised.
22 Thanks, Valerie. Appreciate your time with us today.

23 MS. MCKINNEY: Thank you.

24 CHAIR SMITH: Next up is Bradley McNeil, then
25 Michael Huber, and then Jim Clark.

1 Bradley, are you there? Oh, Brad was here. Oh, no,
2 sorry, wait. Oh, I think maybe wrong number.

3 MS. ARSENAULT: That's right. Yeah, sorry. Brad was
4 on the phone.

5 CHAIR SMITH: That s okay. I was confused by the
6 number.

7 MS. ARSENAULT: I was confused by the number it was
8 my mistake. Okay. It looks like Brad was on the phone a
9 little while ago. It looks like he dropped off.

10 CHAIR SMITH: Connection challenges, perhaps. Okay.
11 So we will try to pick up Brad at the end of the day. So next
12 up then is Michael Huber.

13 Michael, are you there?

14 MR. HUBER: Hello. I'm here. Yes.

15 CHAIR SMITH: Oh, wonderful.

16 MR. HUBER: My name -- oh, go ahead.

17 CHAIR SMITH: I was just going to say, yeah, name and
18 affiliation, and then you can get started.

19 MR. HUBER: All right. My name is Michael Huber, and
20 I serve as the vice chair for the board of directors at the
21 International Food Additives Council which is a global
22 association representing manufacturers and end-users of food
23 ingredients.

24 Today, my comments pertain to our petition to amend
25 the potassium phosphate listing by removing the made-with-

1 organic annotation. We fully respect the Board's duty to
2 safeguard human health by ensuring harmful substances are not
3 allowed in organic production, and with that in mind, IFAC
4 firmly stands behind our petition because it's supported by
5 robust scientific evidence and regulatory frameworks that
6 affirm the safe use of potassium phosphate in all foods,
7 including organic.

8 While we recognize that there are some peer-reviewed
9 studies that raise some general health concerns about phosphate
10 intake, it's essential that the Board differentiates between
11 broad health concerns and actual scientific evidence confirming
12 safety at regulated levels. The subcommittee also noted that
13 di-potassium phosphate is FDA-designated as GRAS -- is the only
14 potassium phosphate designated as GRAS -- which is not correct.
15 There are other potassium phosphates that have also been
16 affirmed as GRAS as early as 1975.

17 Moreover, regulatory authorities like the European
18 Food Safety Authority, Health Canada, and the Codex have all
19 consistently confirmed their safety. In 2019, EFSA established
20 an acceptable daily intake of 2.8 grams of phosphorus for an
21 average adult, encompassing both natural phosphorus and added
22 phosphorus. This level is deemed safe across all population
23 groups.

24 Here in the United States, the FDA data from the
25 NHANES study shows that the average phosphorus consumption is

1 about 1300 milligrams per day, which is well below the ADI EFSA
2 established and the tolerable upper limit of 4000 milligrams.

3 Furthermore, the alternatives listed in Appendix A,
4 they're not functionally equivalent to potassium phosphate.
5 Food formulators are highly specialized, and potassium
6 phosphates provide critical functions that other substances
7 can't replicate on their own, and in fact often have a
8 synergistic effect with phosphates. Removing that annotation
9 would allow manufacturers more flexibility which they need,
10 while supporting the growth and integrity of the organic food
11 sector.

12 In conclusion, the comprehensive safety evaluations
13 by multiple regulatory bodies confirm that potassium phosphate
14 is safe for use in food. Its presence on the list already
15 reflects the Board's recognition of this. We're simply asking
16 to remove the limiting annotations to enable organic food
17 manufacturers to use potassium phosphate in products that
18 otherwise would fully qualify for the organic label. So we
19 urge the Board to base its decision on sound evidence and not
20 speculation, and thank you for your time and consideration.

21 CHAIR SMITH: Thank you.

22 Any questions for Michael?

23 MR. HUBER: That was a lot in three minutes.

24 CHAIR SMITH: I'm not seeing any hands. Thanks for
25 your time, Michael, and thanks for being with us today.

1 MR. HUBER: Thank you.

2 CHAIR SMITH: Okay. Next up is Jim Clark. Then we
3 have Leslie Touzeau, and then Everett Codd.

4 Jim, name and affiliation, and you can get started.

5 MR. CLARK: Absolutely. Greetings, everyone. Good
6 afternoon from Central Nebraska. My name's Jim Clark, Jim
7 Clark Farms, Clark Specialty Grains, third-generation farmer.
8 Went away from farming alone at the turn of the century, built
9 what we refer to as Clark Specialty Grains. It is primarily a
10 corn cleaning facility, and we offer contracts to about 50 corn
11 growers each year.

12 My concern and why I'm speaking with you today is
13 about ten years ago when I started going to international trade
14 conferences I became very concerned in the arrogance, if you
15 will, the lack of concerns of American rules. In other words,
16 the level playing field is not certainly there. I would be
17 approached by supply companies, and I would tell them of the
18 corn needs that they perhaps needed, and it was obvious that
19 right away it was not an organic product. I would be
20 approached, and simply said whatever you need, we can deliver,
21 whatever paperwork you need. And so I'm very, very concerned
22 that this has been going on for quite some time.

23 I applaud you guys for more scrutiny with the
24 American organic corn farmer and adding various testing in. I
25 just want to see this being done as the boats are coming in

1 because, if you combine all the growers that I have and the
2 bushels that they produce, one boat coming into the United
3 States to any of our ports is an equal amount of grain. So I
4 just plead with you to please let's have scrutiny in testing
5 from all aspects everywhere, just so our American farmers have
6 an equal chance.

7 I can always tell when, from our tare product, so
8 when we clean off or clean -- primarily we send products into
9 -- if you've ever eaten an organic corn chip, it's highly
10 likely that some of that corn came from us -- so we're cleaning
11 off larger and smaller kernels, wrong color kernels are
12 undesirable. We sell that off as a tare product.

13 Primarily where I'm located, it works best for me to
14 sell my tare product to the West Coast. I can always tell when
15 there's a line of boats coming into the United States, whenever
16 the dollar is strong, whenever all of a sudden there's
17 production costs that are such that it makes it appealing for,
18 I'll say, people that maybe aren't following the rules, those
19 boats start hitting our ports.

20 I just implore you, please, please, let's make this a
21 fair field. I'm worried about the American farmer,
22 specifically the organic farmers that s knocking out, doing the
23 best that they can, and just simply not being able to compete
24 with rules that aren't following -- you know, rule followers
25 that aren't just simply taking care of what they should be.

1 I'm very, very concerned about what is coming into the United
2 States.

3 I'd be happy to address any questions that you might
4 have, on my experience. In addition, I do an awful lot of work
5 with seed and hybridization, so I can address any of those in
6 comments.

7 CHAIR SMITH: Thanks so much, Jim.

8 Any questions for Jim? I see one from Amy.

9 VICE CHAIR BRUCH: Jim, thanks for your time today.
10 You mentioned about seed at the very end and that you're
11 responsible for some of the corn that goes into the organic
12 corn chips. Can you talk about just what varieties organically
13 are available for white corn and also blue corn?

14 MR. CLARK: Great question. In my industry and
15 preparing corn, ladies and gentlemen, that's going in to become
16 ultimately a corn chip, you have to have hybridization, if you
17 will, that is a very hard, dense endosperm, very high test
18 weight, and it has to have certain milling qualities.

19 Unfortunately, there's not a lot of hybrids that meet
20 this that are organically grown, and there s certainly not in
21 blue corn. I provide blue corn seed and pink corn seed to our
22 contracted growers. We rely on white corn and seed corn to
23 come from my approved hybrid list of hybrids that would qualify
24 to make these milling qualities. We then rely on our
25 traditional seed corn companies, and again, each year we're

1 testing approximately 20 to 25 different hybrids to see what
2 potential new hybrids can go on that approved hybrid list.

3 Unfortunately, in the organic seed world there's not
4 a lot of - the chip industry is not a ginormous industry as
5 compared to the feed industry, so you don't have an awful lot
6 of hybrids being geared towards that human consumption market,
7 so that's probably one of the biggest problems that we see is
8 there's just not a lot of organic yellow or white seed that
9 would fit into milling properties.

10 VICE CHAIR BRUCH: Thanks, Jim.

11 CHAIR SMITH: Thanks, Jim. Another question from
12 Kim.

13 BOARD MEMBER HUSEMAN: Real quick, Jim, thank you for
14 your comments. I just want to ask, is your cleaning facility
15 mostly geared towards feed-grade or food-grade corn?

16 MR. CLARK: Great question. We're 100 percent food,
17 human consumption. The only feed that we have would just be
18 our tare product. I sell the tare product into the feed
19 market, so we don't handle any feed quality. Everything's
20 100 percent human consumption.

21 BOARD MEMBER HUSEMAN: Excellent. Thanks so much for
22 your time today. I really appreciate it.

23 MR. CLARK: You bet. Thank you so much.

24 CHAIR SMITH: Thanks, Jim. Appreciate it.

25 Okay. Up next is Leslie Touzeau, then Everett Codd

1 maybe it's not with us -- so Everett, if you are here, make
2 yourself known. Then Dana Perls.

3 Leslie, name and affiliation, and you can get
4 started.

5 MS. TOUZEAU: Great. Thanks, Kyla. Good afternoon.
6 My name is Leslie Touzeau. I am the Organic Policy Manager for
7 Quality Certification Services. Thank you to the Board for
8 your tireless work and the opportunity to comment.

9 My comments represent QCS's perspective as an
10 experienced certifier that oversees a diverse array of organic
11 operations certified to multiple organic standards. Please see
12 our written comments on additional topics, but today I would
13 like to use my time to comment on -- you guessed it -- risk-
14 based approaches to certification.

15 With the implementation of SOE, the organic industry
16 now has robust mechanisms in place to ensure adequate oversight
17 and prevent organic fraud. In recent months, we have heard the
18 NOP encourage certifiers to take a risk-based approach to
19 implementing and enforcing the new rule, yet the regulations
20 lack guidance on how to do so.

21 In comparison, the EU regulations require organic
22 certifiers to assess the risks of certified operations and take
23 a risk-based approach to oversight and inspections. The EU
24 regulations also list specific elements that should be
25 considered part of a risk assessment to ensure a consistent

1 approach by all certifiers.

2 QCS currently uses a risk assessment rubric for all
3 certified operations, regardless of standard. Our assessment
4 incorporates the EU requirements and elements of ACA best
5 practices. We find our assessment useful for identifying high-
6 risk operations and determining which operations should undergo
7 unannounced inspections and sampling.

8 QCS applauds the excellent work of the ACA to develop
9 risk assessment tools for certifiers and organize a working
10 group to further explore this topic. We believe that some
11 consensus surrounding risk-based approaches can be realized
12 through certifier collaboration, and we feel that any change at
13 the regulatory level should be broad and general in scope to
14 allow certifiers the autonomy to evaluate the specific risk
15 considerations of their operations and not perpetuate the one-
16 size-fits-all model.

17 Ultimately however, we are all beholding to the
18 regulations, and guidance from the NOP on how to reduce the
19 certification burden for low-risk operations would assuage
20 certifier concerns of accreditation on compliance. Suggestions
21 for guidance include providing basic universal criteria for
22 assessing operational risk, allowing for remote inspections of
23 low-risk operations that do not physically handle organic
24 products, and setting parameters for limited scope inspections
25 that target specific aspects of an operation s organic system

1 plan.

2 Finally, findings from the National Organic Coalition
3 and the Organic Farmers Association indicate the NOP
4 requirements and certification process are significant barriers
5 to entry for marginalized farmers and farmers of color. As the
6 regulations expand and oversight grows in complexity and cost,
7 we must ensure that systems designed to promote organic
8 integrity do not unintentionally prevent marginalized and often
9 small-scale producers from participating in the organic system.

10 We want organic agriculture to be the norm, and that
11 requires exploring ways to make the certification process more
12 equitable and accessible for all producers. QCS looks forward
13 to continuing this conversation with the NOSB and certifier
14 community.

15 CHAIR SMITH: Thanks so much, Leslie. I see a
16 question from Nate.

17 BOARD MEMBER POWELL-PALM: Leslie, I always
18 appreciate how excellent your comments are, and so thank you
19 for taking the time to give us so much to think about.

20 The question I have for you is when we think about
21 risk-based systems and the community that you're drawing from
22 -- mostly the ACA -- for trying to figure out how to implement
23 risk-based systems, do we have the right people in the room?
24 Do we have forensic experts, those folks who would really love
25 to bust a bad guy, the folks who are actuaries who can say with

1 math this is how you find out where the risk is? And if we
2 don't have them in the room, do we have some sort of path for
3 finding them and bringing them into this space, because while I
4 love everyone in certification, considering myself one of the
5 team, I would say this is somewhat out of the wheelhouse of
6 folks who have traditionally been in certification, in my
7 opinion, but I'd love to hear your thoughts on that.

8 MS. TOUZEAU: Yeah, Nate, that's a great question.
9 And I first want to say that I really respect all of the work
10 of the ACA, and I think that we have really bright minds from
11 certifiers, also staff at the ACA, who have been working on
12 this issue for a while and developing really robust tools for
13 us to use.

14 I think whether or not we have the people in the room
15 who can make the decisions about high-risk operations, and I
16 hope that my - maybe my comments didn't convey this enough --
17 but kind of looking at how to evaluate low-risk operations is
18 really kind of what we are advocating for because it's those
19 low-risk operations that have simple supply chains, maybe
20 they're small, lower gross annual sales. Those are the ones
21 who are really putting - are really, you know, they have the
22 burden of all this kind of complex certification, the
23 additional requirements from SOE -- they are the ones who are
24 really feeling kind of the crush.

25 And so, I do think that we have the right people in

1 the room who can make the decisions about the types of
2 operations that they see on a regular basis who maybe are lower
3 risk, don't have those complex supply chains, and would benefit
4 from a simpler certification process. I don't know if that
5 answers your question, but --

6 BOARD MEMBER POWELL-PALM: It does. It's sort of the
7 opposite of what I asked, but I think it is exactly in balance.
8 So I'm looking forward to continuing this conversation, and
9 thank you for your comments.

10 MS. TOUZEAU: Sure thing.

11 CHAIR SMITH: Amy?

12 VICE CHAIR BRUCH: Thanks, Kyla.

13 Leslie, thanks for joining us today. We really
14 appreciate your comments as well on risk-based certification.

15 I had just a clarifying question. You mentioned in
16 your oral comments a low-risk operation is an operation that
17 doesn't handle product. Is that correct?

18 MS. TOUZEAU: Well, what I said - what I think I
19 said was low-risk operations that also do not physically handle
20 organic products. So a low-risk operation is not, you know,
21 that's not necessarily an operation that doesn't handle
22 products, and an operation that doesn't physically handle
23 products is not necessarily a low-risk operation.

24 Of course, there's lots of variables involved in
25 determining an operation's risk. But there's been, I think, a

1 lot of discussion among certifiers recently about low-risk
2 operations that are not physically handling organic products
3 and what we can do to kind of ease some of the inspection
4 burden, especially when there's no physical location to
5 inspect. So the conversation, I think it's just a part of this
6 larger conversation about risk-based approaches.

7 VICE CHAIR BRUCH: Sure. No, I appreciate that,
8 because I was just wondering, you know, sometimes at least from
9 maybe a farmer point of view, some of the risk does originate
10 from importers and brokers, some of the new members to our
11 community that had to recently get certified. So I just wanted
12 to just get calibrated with the idea that maybe just if those
13 would be classified from your perspective as low-risk or
14 higher-risk, just because some of them do not physically handle
15 organic products.

16 MS. TOUZEAU: Right. Yeah. Great point, and
17 important thing to point out, but that low-risk and not
18 handling organic products can be two different things and not
19 mutually exclusive.

20 VICE CHAIR BRUCH: I know, I'm learning there's a lot
21 of definitions of risk. That's what I learned from folks'
22 public comments and written comments. So it's wonderful to get
23 calibrated. Thank you so much for your time.

24 CHAIR SMITH: I have one question. Sorry, I was
25 trying to pull up your written comments, so I was like half

1 listening at the beginning. My apologies.

2 So can you just say again -- because I know yesterday
3 there was some references to EU work in risk-based
4 certification and having done that for a bit longer perhaps
5 than the NOP scheme -- and so since QCS works in both schemes,
6 I was just wondering like can we learn from them? Can you just
7 repeat that a little bit like succinctly again?

8 MS. TOUZEAU: Absolutely. I think the EU is a little
9 bit more explicit in their regulations about what both organic
10 operations need to do to assess their own risk and then also
11 what certifiers need to do to assess risk. And, in particular,
12 we're looking at high-risk operations.

13 So the risk assessment that we have developed is
14 largely based on the criteria that are listed right in those EU
15 regulations where they provide criteria for the types of things
16 to evaluate for risk. So like the things that are pretty
17 familiar to everyone, but the type, the size, the complexity of
18 the operation, the location, the types of products.

19 The EU also has a list of high-risk products that
20 they apply additional controls to, so there's additional
21 inspection and sampling requirements when we have an operation
22 who's producing or processing those products. So I think that
23 the EU is a really good place to look, and the EU regulations
24 and the NOP regulations are certainly not the same, but they
25 could provide a starting point.

1 CHAIR SMITH: Okay. And so I'm hearing they are more
2 prescriptive, which we love things to be prescriptive and not
3 prescriptive simultaneously. That's how we roll in
4 certification.

5 MS. TOUZEAU: Yes.

6 CHAIR SMITH: And for those specific crop or
7 commodities or whatever that they're applying additional things
8 to, is that something that they're coming out with annually, or
9 like what's the frequency by which you get communication about
10 that?

11 MS. TOUZEAU: Yes, I believe that they update that
12 annually. They update the requirements for additional
13 controls. And so sometimes those commodities -- some
14 commodities are added annually, some are taken off the list.
15 It just depends on kind of their assessment of the market and
16 the risk. So they send that to us annually. We update our
17 policies and procedures and our inspection requirements.

18 CHAIR SMITH: Okay. Awesome. Thanks so much for
19 your time, Leslie. Appreciate it.

20 MS. TOUZEAU: Thank you all.

21 CHAIR SMITH: Yep. Next up is Everett. Do we have
22 Everett or still no Everett?

23 (No response.)

24 CHAIR SMITH: No Everett.

25 Okay. Dana Pearls, you're up next. Then Liz Bawden,

1 and then Daniel Giacomini, and then we're going to take a
2 break.

3 Dana, you are here. Name and affiliation and you can
4 start.

5 MS. PERLS: Okay. Thanks. My name is -- you can
6 hear me okay? Okay. My name is Dana Pearls. I'm the senior
7 food and technology manager with Friends of the Earth, U.S.
8 Thank you so much for this opportunity to share some comments
9 to the NOSB, and I'll be speaking specifically to the Materials
10 Subcommittee on Excluded Methods.

11 So the NOSB has done some really amazing work over
12 the years to clarify, update, and strengthen the excluded
13 methods, particularly as it relates to genetic engineering. I
14 want to encourage the NOSB to continue to track and exclude
15 particularly gene edited techniques from organic, in accordance
16 to the NOSB's already accepted definitions of biotechnology and
17 genetic engineering, and the NOSB should also address
18 techniques such as induced mutagenesis, which is different from
19 gene editing.

20 Plants and seeds intentionally exposed to radiation
21 and toxic chemicals for induced mutagenesis should not be
22 allowed in organic. Plants and seed genomes may mutate
23 naturally over time from exposure to natural environmental
24 factors, but this process is very distinct from intentional use
25 of chemicals and radiation used to alter a plant's genome.

1 So I want to encourage the NOSB to not allow new
2 plant or seed varieties altered using induced mutagenesis into
3 organic, and it's important for the NOSB to be very specific
4 that induced mutagenesis is an excluded method ,and that this
5 technique is distinct from genetic engineering technologies
6 such as gene editing, so it's not covered under that bucket.

7 And the second thing that I'll say quickly, I'd like
8 to veer off the agenda for a moment to talk about organic
9 seeds. Organic seeds are not currently an agenda item, but
10 it's important to address the use of gene edited seeds in
11 organic, and the NOP and NOSB really need to determine if a
12 seed has been gene edited. In order to track this, because
13 they aren't labeled under the situational rule at the USDA, farmers
14 are going to have to ask the seed vendor directly, and the NOP
15 should be doing market research about what gene edited seeds
16 are being sold and what crops are on the FDA's list of
17 biotechnology consultations. That's a way to find out what
18 might be on the market. So I appreciate the opportunity to
19 share about these emerging technologies that will impact
20 organic integrity. That's all from me.

21 CHAIR SMITH: Thank you so much. I see a couple of
22 hands up.

23 Dilip, you are first.

24 BOARD MEMBER NANDWANI: Hey, thanks for your comment
25 and valuable insight on induced mutagenesis. You've kind of

1 answered our questions. But I'd like to particularly ask, what
2 can you tell us more about, if induced mutagenesis is
3 determined to be an excluded method, how should varieties
4 produced using it be handled. Should all varieties with IEM
5 heritage be disallowed for our unique production? How would
6 this be managed?

7 I believe you have already answered partly, I'm not
8 sure, but you can tell a little bit more about it. And should
9 varieties with IEM be allowed -- and I think you said no --
10 perhaps on the basis that IEM is compatible with organic
11 production because subsequent backcrossing sufficiently reduces
12 any negative features. So a little bit more, whatever you can
13 share with us. So with this, thank you.

14 MS. PERLS: Yeah, of course. Thanks for the
15 question. I also submitted some public comments, and I can add
16 some more resources. I can send them afterwards as a follow up
17 so as to not take up too much time.

18 But I think your question is a good one. I don't
19 think that new varieties or seeds using this very intentional
20 induced mutagenesis should be in organic. I'm also aware that
21 there are some plant varieties like the ruby red grapefruit
22 that are already certified as organic that use this technique.

23 And so one option -- which I don't think is ideal,
24 but perhaps is an option -- is to grandfather in those things
25 that have already been certified as organic, like the ruby red

1 grapefruit. And the other, I guess, possibility is that if
2 there's no alternatives to -- there s no organic alternative,
3 then possibly that could be a compromise.

4 But I think that part of the conversation we've been
5 talking about for many years with genetic engineering and gene
6 editing is this forced alteration of a genome, right, and this
7 is a different technique than gene editing. But in that modern
8 biotechnology definition and the course that NOSB and organic
9 is taking is to address that mutation, that direct, intentional
10 alteration, which is very different than if it's done
11 crossbreeding and conventional breeding, or when it's exposed
12 to different mutagenesis that have happened naturally in the
13 environment.

14 So those are some answers to your questions and not
15 all of them. I wonder if it would be helpful if I send you
16 some more materials that go a bit more in depth afterwards.

17 BOARD MEMBER NANDWANI: Sure. Thank you.

18 MS. PERLS: Yeah. Thank you. It's a really good
19 question, and it's a sticky topic.

20 CHAIR SMITH: And Mindee?

21 BOARD MEMBER JEFFERY: Thanks. Dana, I think I heard
22 you say that the NOP should be consulting the FDA's list of
23 biotechnology consultations. Did I get that right?

24 MS. PERLS: That s right.

25 BOARD MEMBER JEFFERY: And does that cover beyond

1 seed? Because I guess I'm more curious to hear your
2 perspective on, yes, we have issues with seed, but
3 biotechnology is proliferating in so many places. Like what's
4 a great resource for the NOSB to keep up on where new kinds of
5 development in biotechnology are appearing in the food system
6 on the seed issue. Not to diminish the seed issue, but I think
7 it's broad.

8 MS. PERLS: Yeah, it's a good question. Indeed, the
9 field of genetic engineering and synthetic biology is
10 exploding, particularly now with the field of digital
11 agriculture and the combination of AI potentially being used to
12 do synthetic biology. But I think there are a number of
13 reports that Friends of the Earth has been working on, and
14 there's some other great places to check out.

15 Some of the things that I'm concerned about for
16 organic are the things that are designed to spread. So the
17 genetically engineered mosquito is up for commercialization,
18 but the company, Oxitec, really is focused on agricultural
19 insects. And so there's a whole pipeline of genetically
20 engineered insects designed for use in agriculture. So that's
21 something that is designed to live, spread. Cross-boundary
22 issues are a huge problem.

23 I'm very worried about the recently commercialized
24 gene silencing spray which drift is a huge problem for this
25 spray as it impacts other crops on other fields, as well as

1 pollinators. That's of really big concern. It's ultimately
2 like genetic engineering on the field as opposed to in the lab.

3 I'm also really concerned about the recently
4 commercialized genetically engineered soil microbes which also
5 raise concerns around contamination and spreading. And then
6 lastly, the recently approved genetically engineered wheat is a
7 big problem. That's something that has been on the table for
8 genetic engineering for a very long time. There's a lot of
9 concerns about other countries not purchasing wheat from the
10 United States for fear of cross-contamination. And then, of
11 course, the ties to huge amounts of glyphosate and Roundup
12 already used in wheat.

13 So I think the wheat's an issue for contamination,
14 but the GE soils, the genetically engineered insects, the gene
15 silencing sprays, these are all things that I'm very concerned
16 about for the integrity for organic. They're very difficult to
17 track. They are possible, but the spreading risk is very huge.
18 So this is a part of the trend is that it becomes more and more
19 difficult as the intention is to engineer whole ecosystems and
20 not just a specific plant.

21 I'd be happy to share. We've done a bunch of
22 literature reviews with some scientists looking at what is the
23 science saying about the risks and concerns. I'm leaving for
24 the UN Convention on Biodiversity tomorrow where there's going
25 to be whole expert groups looking at transient modification,

1 which is the gene silencing spray where you engineer on the --
2 and then also looking at the soil microbes. So there's a lot
3 of concern internationally about how you would even do a risk
4 assessment for these technologies and the risks of
5 contamination on biodiversity.

6 So I can send you both the expert reviews coming out
7 of the UN, and then I can also share some of the lit reviews
8 that Friends of the Earth has partnered with, with some
9 scientists out of Europe.

10 BOARD MEMBER JEFFERY: Amazing. Thank you so much
11 for all that work. So is the FDA's biotechnology consultations
12 going to house all of those different kinds of biotechnologies?

13 MS. PERLS: No, I mean I'm referring to it
14 specifically for seeds and crops. The genetically engineered
15 insects will probably be a mix of the USDA and the EPA. The
16 gene silencing pesticides will be the EPA. So it's annoying,
17 but the application really depends on if they consider it
18 bioengineered biopesticide or is it specifically for
19 agriculture? So it s, yeah, the EPA is kind of probably better
20 than the USDA, but I can also -- I can refer for each of these
21 applications which agency it goes to.

22 BOARD MEMBER JEFFERY: Appreciate your work so much.

23 MS. PERLS: Yeah, thanks for the question.

24 CHAIR SMITH: Nate?

25 BOARD MEMBER LEWIS: Hey, Dina. Thanks for your

1 comments. I wanted to just push your written comments out a
2 little further so I can make sure I fully understand them --
3 and I'm trying to figure out the best way to ask this question
4 -- but is the concern about the use of the chemicals and
5 radiation themselves, or is the concern about the type of
6 mutations that those techniques cause? Did that come across?

7 MS. PERLS: Mm-hmm.

8 BOARD MEMBER LEWIS: I can push it a little further.
9 Is it the chemicals and radiation? Is it the mutations? Just
10 want to know.

11 MS. PERLS: Yeah, I think they're both because I
12 don't think you can separate them out at this point. I think
13 perhaps you used to be able to separate those out, but not so
14 much anymore. Like the way that they do this induced
15 mutagenesis and the radiation and the chemical use in a lot of
16 applications are for the mutation of genetics, and so I think
17 it's a both/and. I don't think that the heavy chemical use and
18 the radiation is consistent with organic, and so just that by
19 itself I don't think, you know, people aren't wanting the use
20 of heavy chemicals.

21 And then on the other side, though, it's changed,
22 right? All these technologies are shifting with the way that
23 they're being used and for what they're being used, and so I
24 think that it is a both/and. The impact is intentionally to
25 alter the genes and the mutations.

1 If there is a case-by-case basis, it would be
2 interesting to look at, but from what I'm seeing --- which is
3 not everything -- it's the intended use is for that mutation.
4 And I'm sure there are plenty of exceptions, which makes the
5 topic a bit complicated, but I think without NOSB getting into
6 every single application of induced mutagenesis, I think that
7 new varietals going forward probably should just not be
8 included.

9 But it's a yeah, I feel like these are details that
10 need to be explored explicitly because there are some that just
11 really shouldn't be in organics and some that maybe can be,
12 yeah, that are a little more could be. I would love to talk
13 more about this and can share more deep information as well.
14 Thanks, Nate.

15 CHAIR SMITH: Franklin?

16 BOARD MEMBER QUARCOO: Yes. My question is whether
17 it makes a difference what the mutagen is, whether it's
18 chemical or radiation, or do you consider them in the same
19 boat?

20 Or is there a distinction? Is your attitude
21 different or your perspective different if it happens to be
22 chemical or radiation, or there is no distinction as far as
23 you're concerned?

24 MS. PERLS: I guess, again, the concern for me more
25 is that -- the chemical definitely is a concern, and then the

1 concern is the forced mutations, right? The concerns that
2 we've been having about genetic engineering, in addition to the
3 to the use of chemical pesticides that go along with it --
4 whether gene editing or genetic engineering, the older versions
5 -- that this forced mutations always have unintentional
6 consequences. Some of them intentional consequences, some of
7 them unintended. Oftentimes, different parts of the genome are
8 impacted, not just the trait that the technology is meant to
9 address. So I think it's both the problem of irradiation and
10 chemical use I think is a problem for organic, but certainly
11 the heavy chemical use.

12 And again, so much of what the NOSB has been strong
13 on is this idea of the forced mutations of a genome, which is
14 far from natural and it's far from organic. We're getting into
15 a realm where mutations of genes are not just going to be what
16 we've seen in the past with genetic engineering. Now it's
17 getting to all sorts of new realms, and so the NOSB is really
18 going to have to expand how we look at mutations of genomes,
19 because what we're seeing is it's the same ripple effects of
20 detrimental impacts, and it's going to start looking
21 differently -- as Mindee had said -- as things change with
22 biotechnology, and we're starting to see a lot newer techniques
23 that have the same problematic impacts. Does that sort of
24 answer your question?

25 BOARD MEMBER QUARCOO: Yes.

1 MS. PERLS: I think it is a problem. I think the
2 answer is yes. I think that radiation and chemical use is a
3 problem and should not be allowed in organic.

4 BOARD MEMBER QUARCOO: Thank you.

5 CHAIR SMITH: Thanks, Dana for your time being with
6 us today.

7 MS. PERLS: Sure.

8 CHAIR SMITH: Okay. Next, we have Liz Bawden, and
9 then Dan Giacomini.

10 Liz, are you there?

11 MS. BAWDEN: Yes, I'm here.

12 CHAIR SMITH: Wonderful. Okay. Name and affiliation
13 and you can get started.

14 MS. BAWDEN: So my name is Liz Bawden. I'm from
15 Bawden Farms in Hammond, New York, and I want to thank you all
16 for the opportunity to speak with you today.

17 My family's dairy farm has been certified organic for
18 24 years. We milk around 80 cows and crop about 1000 acres of
19 organic pasture and hay land. We're certified with NOFA New
20 York. I'm past president of NODPA, the Northeast Organic Dairy
21 Producers Alliance, and a past member of the board of directors
22 for NOFA New York. I'm a current member of OSA, the Organic
23 Farmers Association. And I'd like to today offer my support
24 for the adoption of meloxicam for use in young cattle less than
25 a year in age.

1 I know that you all are very aware of how involved
2 organic livestock farmers are in their animals care and how
3 seriously we work to provide them with the highest levels of
4 animal welfare. Meloxicam would provide us with the ability to
5 perform a dehorning or disbudding procedure on young calves
6 with much better pain management than what's available to us
7 now. And I know my vet is totally on board with this. He
8 knows that it's significantly easier to administer, and he
9 knows that it's pain relief lasts longer, far longer than the
10 lidocaine we use now. The same is true for the homeopathic
11 arnica and hypericum which we also use to reduce pain and
12 swelling.

13 And while some farms use aspirin, we don't use it for
14 dehorning as it doesn't provide much pain relief, just mild,
15 and discourages quick clotting in a wound. So the addition of
16 meloxicam to the national list would be a welcome addition to
17 our toolbox for calf care on organic farms.

18 At this time, I do agree with others who would limit
19 its use to calves under one year of age. I am concerned that
20 the available information is insufficient to ensure that
21 sensitive consumers would not be exposed to traces of meloxicam
22 in organic milk or meat from treated animals. Others have
23 suggested that a technical review is needed to establish
24 appropriate doses for and withdrawal from a variety of
25 livestock species and classes of animals, and I would agree

1 with that.

2 I want to thank you for allowing me to voice my
3 opinion today, and thank you for your work on the NOSB and your
4 commitment to organic food and agriculture.

5 CHAIR SMITH: Thanks, Liz. I see a question from
6 Nate.

7 BOARD MEMBER POWELL-PALM: I just wanted to say thank
8 you, Liz, for joining us today and for the hard work that is
9 being a dairy farmer. So thank you for making the food that we
10 all eat.

11 A question for you on the toolbox. So when you think
12 about the pain mitigation tools you have for your cattle, I
13 know you would agree that pain doesn't stop at one year, and
14 disbudding is only one event that we have that causes pain to
15 our food-producing animals. What is in the toolbox that you
16 feel is sufficient to manage the pain of your older-than-one-
17 year animals?

18 MS. BAWDEN: There's not a lot, right? So it's
19 aspirin, it's flunixin or Banamine, which is more difficult to
20 administer because it has to go in an IV rather than as an
21 injection. So it's not a lot.

22 BOARD MEMBER POWELL-PALM: And so would you say that
23 it makes sense to expand meloxicam as a very effective tool
24 across all ages of cattle, knowing that it'll be under the
25 guide of your veterinarian to make sure that withdrawal times

1 are appropriate, but just so that you have something for when
2 that cow twists a foot or has an especially horrific birth,
3 that we would have a tool in the toolbox.

4 MS. BAWDEN: I think we -- I would like to have more
5 tools. Let's say that.

6 BOARD MEMBER POWELL-PALM: Sure.

7 MS. BAWDEN: But I think we need to be really
8 cautious because we're setting a precedent here. So I think we
9 really, honestly need a serious review that's done by people
10 with obviously more laboratory experience than what I have. So
11 I'm not the person to make that decision, and I recognize that.

12 But because there's going to be the next drug and the
13 next drug and the next drug that we're really going to have to
14 look at very carefully, and I also don't want to go backwards
15 and lose consumers' trust or do just a bad job of reviewing
16 these things.

17 So I look at -- I don't certainly rule it out, but I
18 want us to be really cautious and say, by using this in calves,
19 that deals with one problem. That animal, it's going to be
20 another year and a half or two years or something before that
21 animal's milk is in the milk shed. So you can say, well,
22 absolutely, there's nothing left for that consumer who's real
23 concerned, right?

24 BOARD MEMBER POWELL-PALM: Totally. Would you say
25 that -- well, are you aware that the process doesn't end with

1 our vote here in NOSB. There's a whole rulemaking process
2 afterwards where we're going to have a bunch of experts,
3 pharmacologists, weighing in. Was that made clear to you in
4 your being recruited for comments today?

5 MS. BAWDEN: Vaguely, yes.

6 BOARD MEMBER POWELL-PALM: Okay. I so appreciate it.
7 Well, thank you so much, Liz.

8 MS. BAWDEN: I realize the vote doesn't happen at the
9 end here, but I think it's just so important that we go really
10 cautiously when we're allowing new drugs. I think that's
11 critical.

12 BOARD MEMBER POWELL-PALM: Absolutely. And that will
13 be done. Yes. Thank you.

14 CHAIR SMITH: Another question from Allison.

15 BOARD MEMBER JOHNSON: Thanks so much for your
16 comments, Liz, and for being here.

17 Is the one-year mark -- I'm curious about the sort of
18 rationale for drawing the line there, because I really share
19 your tendency towards caution and being careful here, so I'm
20 trying to wrap my head around this from a lot of different
21 angles.

22 Is the one-year mark appealing because of the
23 distance from when that cow s would start to go into the
24 marketplace, or is there some other reason for the one-year, or
25 just that's the majority of the uses that you think would be

1 useful to capture at this phase? Let's just get like a little
2 more granular on that.

3 MS. BAWDEN: Yeah, I think -- and we've talked with
4 other farmers about this -- so the use for disbudding is a
5 really great thing -- and dehorning. So different farms dehorn
6 at different stages. On our farm, we try to do it at two weeks
7 of age or less, but that isn't true necessarily with
8 everybody's farm, so if I said under a month of age, that may
9 not be good for everyone else.

10 I think really compromising it under a year, it's
11 exactly that. It puts it so far away from that animal's milk
12 entering the milk stream as to make sense. So you're right.
13 If an animal that's one year and a day breaks a leg or
14 something like that, do we lose the ability to use that? And I
15 guess that's just splitting ridiculous hairs. But yeah, why
16 did we choose that? Yeah, I think, again, it's to catch
17 everybody who's doing dehorning and that sort of use, and to
18 keep it far enough away from where it enters the milk stream.
19 So it's kind of arbitrary, yeah.

20 BOARD MEMBER JOHNSON: That s helpful to get a little
21 bit more detail on it. Thank you.

22 CHAIR SMITH: Thanks so much for your comments, Liz.
23 Thanks for joining us today.

24 Dan Giacomini, are you there?

25 MR. GIACOMINI: Yes.

1 CHAIR SMITH: Perfect.

2 MR. GIACOMINI: So my video will unmute as well?

3 CHAIR SMITH: Yes. Hello.

4 MR. GIACOMINI: Okay. Hello.

5 CHAIR SMITH: Okay. Name and affiliation, and you
6 can start.

7 MR. GIACOMINI: Yes, thank you. I'm Dan Giacomini.
8 I've been consulting in organics since the 1990s. I'm a former
9 member of the NOSB, serving as Board Chairman in 2010.

10 First, I urge the NOP and the NOSB to review the
11 petition template process. The current process is biased in
12 favor of the manufacturer, and this is a mistake. Adding
13 substances to the national list should be biased to the
14 producers and operations needing the substance, not the
15 manufacturer wanting to sell something.

16 I support the listing of meloxicam as an oral pain
17 relief medication on the national list. Meloxicam is a
18 substance that needs to be added now. Boarders should not let
19 arguments of recommendation process issues block animal welfare
20 and alleviating pain, animal suffering.

21 There's not a requirement for a TR, and every
22 question in the TR was addressed in the petition. I'm not
23 aware of any major questions on the accuracy of the data in the
24 petition, only that a TR was not completed. A TR would delay
25 listing this material on the national list and delay the pain

1 relief its listing would allow.

2 Often when the NOP publishes a rule change regarding
3 livestock, and particularly dairy cattle, they state that one
4 of the reasons that the rule change is needed is because of the
5 consumer gateway nature of milk and dairy products. Often new
6 organic consumers start with milk. While I hate this
7 justification, if it is going to be used, then give those same
8 producers the tools they need to carry that burden.

9 Please do not take away the entire fence limiting
10 synthetic methionine and organic poultry production. It is
11 possible the fence was placed too close and needs to be relaxed
12 a bit, but let's not forget DL-methionine is relative new
13 introduction to poultry nutrition. Adding synthetic methionine
14 to poultry diets allowed for production practices that were not
15 possible before. These two factors increase production -- and
16 I'm not saying that the industry could survive going back to
17 1960s level of production -- but comparisons of organic
18 production parameters to conventional practices is not a major
19 factor in the intent of organic livestock production
20 rulemaking.

21 As an animal nutritionist, I doubt that TR would find
22 the answers you should be looking for in altering this
23 annotation fence that's currently in place. However, the
24 historic record of the methionine task force from which the
25 language of the annotation came from does exist. Please go

1 back and review the transcripts and documents of this industry
2 group and conversations it had with the NOSB at that time.

3 It is unfortunate that OEFFA forces an omnivore
4 species to consume a vegetarian diet, and it does seem time to
5 move back the fence that the current synthetic methionine
6 listing has, but please review moving it back rather than
7 allowing an unlimited usage of this product. Thank you.

8 CHAIR SMITH: Thanks, Dan. I see a question from
9 Kim.

10 BOARD MEMBER HUSEMAN: Hi, Dan. I really appreciate
11 your comments today as being in the nutritionist world and
12 animal livestock feeding.

13 When you talk about the fence -- and I'll use a
14 Goldilocks term of porridge being too hot and too cold -- where
15 is methionine just right?

16 MR. GIACOMINI: I don't know, and the research that
17 would find that is probably not really being done because it's
18 not a major factor of the use of synthetic methionine. It's
19 certainly not going to be promoted by the manufacturers who are
20 paying for ways to feed more of it.

21 When I was on the Board, we reviewed methionine three
22 times in five years. We worked with Methionine Task Force.
23 They tended to not -- I won't say they changed the fence, but
24 wanted to change what the fence looked like almost every time.
25 One time it would be the amount of total methionine, the other

1 time would be an amount of methionine and lysine combined in
2 various ways.

3 And I was on the Board when this fence was put up.
4 It was within the parameters of what that task force thought
5 would work. If it's too tight for animal welfare reasons of
6 ammonia levels and knuckle issues in houses and things, I think
7 it's definitely worth looking at and relieving that. But if we
8 just take it away -- Katy bar the door -- synthetic methionine
9 is just going to come crashing in as much as they can justify
10 getting into the system. If we are going to have an allowance
11 on that at, you know, then that it is a synthetic product, I
12 think we need something. And again, it's unfortunate that we
13 can't look at OEFFA and bring in some new products that would
14 alleviate the whole problem, but they're not allowed.

15 So that's where we are right now. That's where OEFFA
16 stands, it always has. There's no question OEFFA -- and even
17 if you look in the rule on 237 -- there's no question it was
18 originally formulated with mainly ruminants in mind, and it s
19 you always hate going back and opening a box to Congress. But
20 a lot of that is written within specifics of what OEFFA said,
21 and it's really not well-written for non-ruminant species.

22 BOARD MEMBER HUSEMAN: Yeah, the whole vein of using
23 like a meat and bonemeal product, that's another subject, but I
24 appreciate you bringing that into light, too. And I agree with
25 you that there seems to be different reasoning at a different

1 time for some of these senses, so I appreciate you mentioning
2 that in your comments. Thank you.

3 CHAIR SMITH: NPP -- short, please. We're like
4 behind the schedule.

5 BOARD MEMBER POWELL-PALM: Pithy, pithy.

6 Dan, thanks for your comments. This is sort of the
7 first I've heard someone insinuate that there is a motivation
8 to overfeed methionine. Why would anyone overfeed methionine?
9 It's very expensive.

10 MR. GIACOMINI: I did not mean to say that anyone
11 would try to overfeed methionine, but there is a - I don't
12 think anybody can really deny that the providers and
13 manufacturers of synthetic methionine would love to see the
14 feeding of that product maximized.

15 BOARD MEMBER POWELL-PALM: Sure. But is that not
16 balanced by the consumer's bank account of not wanting to spend
17 money unnecessarily?

18 MR. GIACOMINI: Most likely. I'll acknowledge that.
19 But a lot of times poultry feeds tend to be manufactured and
20 produced as full feeds by a manufacturer, and the producer does
21 not always have -- unless they're really big, or they're tied
22 up with a really big grouping -- does not always have a lot of
23 control over how much of that is - how that is exactly being
24 formulated.

25 BOARD MEMBER POWELL-PALM: Totally. And to keep it

1 pithy I'll just close with -- but consumers are always going to
2 say if I can get it cheaper somewhere else I'm going to, and if
3 you're trying to oversell methionine, that's just going to be
4 an unnecessary expense that doesn't have any benefit for the
5 producer. Would you agree?

6 MR. GIACOMINI: That is true as long as there are
7 always at least two potential providers, and I'm not sure there
8 are.

9 BOARD MEMBER POWELL-PALM: Oh. Okay, then. Yeah.
10 All right. Thank you. Appreciate it.

11 CHAIR SMITH: Thanks, Dan. Appreciate your comments.

12 MR. GIACOMINI: Thank you.

13 CHAIR SMITH: Okay. We are at a break. We're going
14 to come back at 2:30, so 9 minutes. Be quick. Got to try to
15 get us back on track.

16 (Recessed at 2:21 p.m.; reconvened at 2:30 p.m.)

17 CHAIR SMITH: Okay. Welcome back, everybody. I
18 failed to announce a couple of speakers after the break, so
19 thanks for putting those on the screen there. We have
20 Kylie Mausser, Rafaella Mazza -- who perhaps is not here -- and
21 then Jason Johnson.

22 So do we have Kylie?

23 MS. MAUSSER: Hi, can you hear me?

24 CHAIR SMITH: I sure can. Name and affiliation, and
25 then you can get started.

1 MS. MAUSSER: Okay. my name is Kylie Mausser, and I
2 am calling in as a consumer. I live in Iowa, and I homeschool
3 my four kids. Therefore, I make at least three meals a day,
4 and as I get older, I'm making even more, so it's important for
5 me to feed my family organically as much as possible. I
6 especially try to buy the dirty dozen.

7 And so organics are important to me because I want to
8 keep them healthy and limit the amount of chemicals that we
9 ingest on a daily basis. It's hard enough with the air we
10 breathe, the water we drink, and the beauty products we put on
11 our skin. My husband also has an autoimmune disease, so I
12 suspect that he actually partially got it because of the food
13 that we eat.

14 I historically am personally a very trusting person
15 and tend to believe whatever I hear. However, the older I get,
16 the more kids I have had, and then the wiser I've become, I
17 realize that things aren't always what they seem. That being
18 said, I would like to say that I would support better and more
19 widely-spread testing on organics, both in the foreign market
20 and in the U.S. And in order to hold people accountable, I
21 just think that that would be wise, and it would give family
22 and friends peace of mind in knowing that we're getting what we
23 paid for, and also what's listed on the label is that it's
24 accurate and honest.

25 And I want to thank you all for all that you do for

1 this country and for all the time that you invest because it's
2 such an important mission.

3 CHAIR SMITH: Okay. Thanks so much, Kylie, for your
4 comments. I see you have a question -- a couple questions
5 actually. so stick tight.

6 Amy?

7 VICE CHAIR BRUCH: Yeah. Kylie, thanks for joining
8 us and lending your voice to the process. I just also want to
9 say as a farmer, thank you to consumers like yourself for
10 supporting us. Appreciate it.

11 MS. MAUSSER: You're welcome. Thank you.

12 CHAIR SMITH: Brian?

13 BOARD MEMBER CALDWELL: I just want to thank you for
14 having that consumer voice and echoing what Amy just said, so
15 thanks so much.

16 MS. MAUSSER: Thank you.

17 CHAIR SMITH: Okay. Yeah, thanks for joining our
18 process.

19 MS. MAUSSER: Yeah, thank you all. Bye-bye. Take
20 care.

21 CHAIR SMITH: Okay. Rafaella, are you there?

22 MS. MAZZA: Yes, can you guys hear me?

23 CHAIR SMITH: Yeah, sure can. State your name and
24 affiliation and then you can get started.

25 MS. MAZZA: Sure, so I'm Raffa, I'm representing

1 myself, I'm an agronomist from Brazil actually, and I moved to
2 the U.S. a few years ago to get my degree at Harvard Business
3 School, and I've always worked in the sector, and thank you,
4 Amy, for inviting me to share my experience.

5 So I'd love to give some color to what I've
6 experienced as an agronomist in Brazil working with
7 regenerative organic row crops between 2018 and 2020, and also
8 visiting a lot of Midwest farms in the same period here in the
9 U.S. to understand the differences. I feel like that can
10 inform ways of measuring and monitoring for imported grains
11 into the U.S.

12 So I think the main differences would really be how
13 the unique economics of farming differ between the two
14 countries. Weed control is very different. Pest control is
15 very different. The weather, for sure, not having a winter
16 season changes everything, again, back to the insects and
17 diseases cycle. The access to equipment for organic farming is
18 very different, and most agriculture is growing fed and not
19 irrigated. I think that's a big difference.

20 I feel like countries like Brazil -- and that's where
21 my experience has been -- have such a great opportunity to
22 learn from the U.S. where, from my experience again, organic
23 farmers are way ahead in terms of years of experience, access
24 to technology, and how developed the community is. So even
25 though you could think that maybe labor is cheaper, weed

1 control by hand is just like really low-tech, really, really
2 hard. You kind of destroy the whole row crop. So I think all
3 these points go back to the importance of working with the
4 right partners in the right way, monitoring for your production
5 to make sure it's organic.

6 So yeah, thank you for the space to share my
7 background here.

8 CHAIR SMITH: Thanks so much for joining our process.
9 Let's see if we have any questions. I see one from Nate.

10 BOARD MEMBER POWELL-PALM: Thank you, Raffa, for
11 joining comments today. I think I was understanding what you
12 were saying about low-tech, but could you expand a little bit
13 on -- in some circles the assumption is that, I would say, more
14 developing countries, they're organic by default, and they
15 can't necessarily afford the inputs we would be concerned
16 about.

17 Could you speak a little bit to what you mean by
18 whether or not these folks are going to be using hand labor, if
19 they're going to be hand-weeding, sort of the realness of could
20 they produce the levels of crops that they're producing, and
21 what the challenges are in organic in, I would say, more of the
22 Global South?

23 MS. MAZZA: Yeah, that's a great question. So I
24 would never say that, let's say, a low-tech kind of small
25 producer that's producing for their own food, and very small,

1 low-tech kind of thing, I wouldn't say that's organic.

2 If you go back and try to check all the boxes that
3 the certification process would require, I do believe you'd
4 find things that say, oh, this does not match the organic
5 requirement. So I would not say that just because they are
6 using less technology they are organic. They probably are
7 using some sort of chemical because it's really, really hard
8 not to use any chemistry, not to use any GMO.

9 The pressure from pests and diseases, it's like it's
10 really hard. So it's almost -- if you're low-tech -- it's
11 almost harder to try to be organic versus some sort of low
12 technology but still traditional kind of agriculture, if that
13 makes sense.

14 BOARD MEMBER POWELL-PALM: It absolutely makes sense.
15 Thank you so much. I really appreciate that.

16 CHAIR SMITH: Amy?

17 VICE CHAIR BRUCH: Yeah, thanks, Kyla.

18 Rafaella, thank you so much for joining our process.
19 Our program is global, and it's great to have international
20 voices participate in our public comment process, and thank you
21 for comparing and contrasting production, organic production,
22 in the Southern Hemisphere.

23 I wanted to just ask you, I know you were helpful on
24 a certified organic farm in Brazil. Can you discuss the delta
25 in the yields from your operation organically versus some of

1 the surrounding conventional operations of similar crops?

2 MS. MAZZA: Yeah, we definitely took a hit in the
3 first few years, and I feel like it took us a while to learn
4 how to do it in that specific farm. You're still very much
5 dependent on the season. So, for example, for biological pest
6 control, we would have our own farm kind of factory where we
7 would produce this organic certified biological chemistry pest
8 control solutions. But if you miss the application for like
9 one day, you kind of, you know, you are ruined. You might lose
10 like 5 bags per hectare or 10 bags per hectare just because you
11 missed one day.

12 So I feel like there would be plots where we could
13 get like the same yield than a conventional neighbor farmer,
14 but that was because we were doing like a very good job, we had
15 been trying for a few years, we had the best partners and the
16 best solutions available. But then there would be other plots
17 where, unfortunately, nature happens, and it's really hard, and
18 then you're just below average.

19 So I would say for an organic farmer, from my
20 experience, to be kind of the same level of productivity than a
21 conventional neighbor farmer, they are kind of doing two, three
22 times more, and spending more time and money as well. So it's
23 not impossible, it's just way, way harder.

24 And again, maybe back to Nathan's question, I would
25 never say that a farmer that's just not using conventional

1 inputs is organic and getting the same productivity than their
2 neighbor. That just sounds like -- you know, from the agronomy
3 perspective -- that doesn't sound reasonable to me because I
4 saw how hard it was for us to be average conventional
5 productivity. It is doable, it's just way harder.

6 VICE CHAIR BRUCH: Thank you so much, Raffa.

7 MS. MAZZA: Thank you again.

8 CHAIR SMITH: Thanks for joining us today.
9 Appreciate it.

10 Next up, we have Jason Johnson, then Mike Dill, then
11 Erin Silva.

12 Jason, are you there?

13 MR. JOHNSON: Yes.

14 CHAIR SMITH: Awesome. Name and affiliation, and you
15 can get started.

16 MR. JOHNSON: Jason Johnson, associate director for
17 the Organic Farm Program at Stonyfield Organic. Thank you for
18 the opportunity to comment. I'm going to focus today my
19 comments on the petition to add meloxicam to the national list.

20 I have 30 years of experience in the dairy industry
21 as a dairy farm manager, farm owner, and managing Stonyfield's
22 direct milk supply. Stonyfield was founded in 1983 with the
23 goals of helping family farms survive and protecting the
24 environment, and today we're the country's leading organic
25 yogurt producer. We know that consumers count on the organic

1 label to ensure that products were grown, processed, and
2 handled in a way that they can trust, and we appreciate the
3 critical role this board plays in upholding the integrity of
4 the organic standard.

5 In my capacity at Stonyfield, I'm a certified FARM
6 evaluator and conduct animal welfare evaluations and audits on
7 approximately 25 to 30 dairy farm operations a year. In
8 addition, I'm certified as a master in the internationally-
9 recognized CowSignals Program.

10 Animal welfare has always been a high priority issue
11 for our consumers, and over the past several decades we have
12 also seen an increased focus on animal welfare across the
13 entire dairy industry. Our parent company, Lactalis, has
14 adopted animal welfare standards that include a requirement for
15 the use of two forms of pain mitigation for disbudding cows
16 between four and eight weeks of age.

17 Organic producers do not have a good option for long-
18 term-acting pain control in disbudding. My firsthand
19 observations is that Lidocaine is a great short-term option
20 during the procedure itself, but as soon as the effects wear
21 off, cows begin to exhibit behaviors associated with pain, such
22 as head shaking, nose pressing, increased agitation.

23 Organic standards need to be updated to ensure that
24 the organic dairy farmers have the tools they need to uphold
25 animal welfare in line with evolving dairy industry and

1 consumer expectations. Most importantly, we need to do what is
2 right for the animals. It is clear that the current pain
3 management tools in organic are inadequate for mitigating pain,
4 but we have the ability to alleviate this by adding meloxicam
5 to the toolbox.

6 As a party to the petition, I know that we made every
7 effort to provide a thorough review of meloxicam. In this
8 process, we did not discover any information that would raise
9 concerns about safety of meloxicam. We're confident that the
10 substance is compatible with organic systems.

11 The NOSB's discussion document does indicate that an
12 increased withdrawal period is needed, and we agree that this
13 would help increase confidence in the use of the substance in
14 organic systems. Similar to how USDA handles withdrawal period
15 for other substances, we suggest that USDA double the
16 withdrawal period recommended by the appropriate regulatory
17 body, which in this case is most likely to be MDUCA.

18 Overall, we believe that animal welfare on organic
19 dairy operations would be greatly improved by the addition of
20 meloxicam. Thank you.

21 CHAIR SMITH: Thanks. You have a question from Nate.

22 BOARD MEMBER POWELL-PALM: Thanks for your comments,
23 Jason. What other animal welfare certifications do you all
24 subscribe to for your programs? Do you use Validus?

25 MR. JOHNSON: We do not require Validus for our

1 direct-supply producers. We require the FARM program, and then
2 our parent company has their own animal welfare platform.

3 BOARD MEMBER POWELL-PALM: Okay. Right now, in the
4 toolbox that we have of approved substances on the national
5 list for pain management, do any of those -- are those
6 sufficient? Are they a sufficient toolbox to meet the animal
7 welfare requirements for a farm or your internal program?

8 MR. JOHNSON: So FARM requires one form of pain
9 mitigation. So you could say that lidocaine fits that bill,
10 but we know that s very short acting, and we know that it is
11 not covering the time period that we need to cover for that.

12 So, as I stated, our parent company requires two
13 forms of pain mitigation. So we do not have a longer-acting
14 option in there. I mean, I think you already heard today,
15 potentially some people use aspirin. It's not effective, and
16 it's out the window. It's gone.

17 BOARD MEMBER POWELL-PALM: Right.

18 MR. JOHNSON: So, no, there isn't a second tool.

19 BOARD MEMBER POWELL-PALM: Okay. One follow-up to
20 that. You are a well-known food company, a CPG, with
21 Stonyfield -- big fan of your yogurts. What is your concern,
22 or do you have a concern, about residue? Or do you feel like
23 MDUCA and the process that it presents with veterinarians is
24 sufficient to protect your consumer confidence in the organic
25 brand for your products?

1 MR. JOHNSON: Yeah, thanks for the question. I would
2 say no, we don't have a concern, because if we follow the
3 people in the process that's already in place, there is no
4 concern. We heard that earlier today about withdrawal periods.
5 And our suggestion of doubling is consistent with other things
6 that have happened but no matter what it is, it's going to go
7 back to a veterinarian consulting with MDUCA. Like you can say
8 double it, but the initial is going to be established by MDUCA.

9 BOARD MEMBER POWELL-PALM: Thank you very much.

10 CHAIR SMITH: Thanks, Jason.

11 MR. JOHNSON: Thank you.

12 CHAIR SMITH: Appreciate your time with us today.

13 MR. JOHNSON: Thank you.

14 CHAIR SMITH: Mike Dill, you are up next, then
15 Erin Silva, then Matthew Borbonus.

16 Hello, Mike.

17 MR. DILL: I think I m unmuted. Am I unmuted?

18 CHAIR SMITH: You got it, sir. You know the deal.

19 MR. DILL: All right. Fantastic. Good morning, good
20 afternoon, everyone. My name is Mike Dill, and I'm
21 representing the Organic Produce Wholesalers Coalition. We're
22 seven certified organic businesses that distribute fresh
23 organic produce to eaters across the country.

24 With regard to risk-based certification and residue
25 testing, I'd like to emphasize a few points from our written

1 comments. One, OPWC suggests that future consideration of
2 these two topics be done in tandem and considered with combined
3 proposals. Two, we encourage CACS to look at the systems used
4 in food safety certification. For example, it is customary for
5 buyers to require a supplier's food safety certificate,
6 inspection report, and corrective actions report as a condition
7 of sale? Providing transparency about non-compliances and
8 corrective actions clearly provides a level of supply chain
9 transparency not seen in the organic supply chain. Food safety
10 does this all the time.

11 Three, consult FDA on how they conduct their testing
12 and food safety surveillance programs. They've been doing it
13 for a while, and the organic community doesn't necessarily need
14 to reinvent the wheel here. Four, NOP could hire specialists
15 who have scientific training in sample selection and testing
16 protocols to provide advice on unusual sampling and testing
17 situations. The handbook cannot cover all situations, and I'll
18 share an example.

19 The NOP handbook suggests one pound as the
20 recommended sample size for grain, yet when I worked as an
21 inspector, I was assigned to sample a grain elevator in the
22 Midwest. A USDA grain specialist advised me to use a sampling
23 method which resulted in hundreds of individual sample bags
24 totaling 280 pounds. For the NOP handbook to suggest a one-
25 pound sample as being representative of a five-story-tall grain

1 silo is neither accurate nor based on any recognized sampling
2 method. And five, we'd like to see a system that does not
3 place the responsibility and liability associated with testing
4 on the inspectors. We'd rather see inspectors focus on
5 observational risks and compliance concerns while they're on
6 site.

7 Regarding the compost proposal, we agree that
8 synthetic feedstock should be reviewed and listed on the
9 national list. However, OPWC urges the Board to send this
10 proposal back to subcommittee to discuss the following issues.
11 First is the elimination of the C to N ratio from the
12 definition based on organic principles or is it simply made to
13 align with regulations by agencies outside of NOP? Second,
14 what impacts might arise from limiting compost production to
15 aerobic conditions? Third, we cannot afford to risk compost
16 being deemed noncompliant for use on organic farms due to
17 procedural oversights, and it would be extremely unfortunate
18 if, for example, the 750,000 annual pounds of organic culls out
19 of our operation were allowed on conventional farms and not
20 organic farms because of produce stickers.

21 And finally, before making a recommendation, we urge
22 the development of a plan for rolling out this new definition,
23 exploring associated changes to other sections of the
24 regulations, creating a process for reviewing the petition, and
25 petitioning current incidental synthetics and compost such as

1 produce stickers. Apologies for going over, but thank you.

2 CHAIR SMITH: No problem.

3 Nate.

4 BOARD MEMBER POWELL-PALM: Thanks, Mike, for your
5 comments. If inspectors aren't supposed to do the testing, who
6 should?

7 MR. DILL: I think that we should look to another
8 agency, whether it's within USDA. I mean that's where I think
9 it should come from. And I'm not -- I guess, you know, we
10 could use inspectors. It's been working so far. Having done
11 it myself, I know that there's a lot of distractions that come
12 with testing. You have to make sure you leave time to go out
13 in the field or, as in my scenario, I was there for eight hours
14 testing, and that doesn't leave much time to audit records and
15 do other stuff. Plus you have to worry about getting your
16 samples to UPS before the end of the business day before you
17 fly out, or I mean there's all these things.

18 So if I look at what FDA has been doing with their
19 food safety testing and surveillance is that they have teams
20 that go out there and they perform the sampling. We've had
21 folks come into our warehouse where they have access to
22 several hundred farms products, and when they have a risk,
23 like for instance one time they came to cilantro was deemed
24 high risk for food safety, so they came and tested several
25 different lots and farms of cilantro. Worked out great. They

1 performed it to their specifications, sent it to their lab,
2 they took care of everything. They weren't there to do
3 anything else but that sampling. It was efficient. It didn't
4 disrupt our business.

5 So I just want us to look to the food safety industry
6 to see how they're handling these things because they've been
7 at it for a long time, and it's working well.

8 BOARD MEMBER POWELL-PALM: On behalf of all
9 inspectors, I think we would say thank you for those
10 observations that we are trying to get our human bodies from
11 one spot to another and making UPS by 5 p.m. is a challenge, so
12 really appreciate you elevating that.

13 CHAIR SMITH: Amy.

14 VICE CHAIR BRUCH: Thanks, Kyla.

15 Thanks, Mike, for joining us today and all the
16 written comments. I appreciate your ideas for benchmarking
17 with best practices in other industries. Thank you for that
18 and your firsthand experiences.

19 I had a question. It was about your written
20 comments. You had mentioned that you do support testing as a
21 tool and also support continued emphasis on primary reliance of
22 verification through review and verification of operation
23 practices, and I wanted to just parse that out a little bit
24 further.

25 How can we be confident that we are verifying and

1 reconciling records and not just reviewing documents shown to
2 us, and checking the box that, yes, I saw a document, versus
3 actually truly verifying like your comment states. How do we
4 do that?

5 MR. DILL: Well, one, I would say -- and I keep
6 hearing this with our risk-based certification -- so again, I
7 feel risk-based residue testing only to be discussed as one
8 topic. But when I hear folks say that maybe we should just do
9 remote audits. Like I've been on the other side of a remote
10 audit and honestly, it was kind of a joke. I mean, we're
11 walking through a 100,000 square foot warehouse, and I'm
12 controlling the camera, and I can show you exactly where I want
13 it to go, I can show you the records I want you to see.

14 And honestly, I think that the more like prescriptive
15 we get and the more tools we try to create, the more, like I
16 say, robotic we become, and we just want to fill out that form
17 or we want to do exactly what the audit plan says, even if
18 maybe we think that there's an issue or we should investigate
19 more here. But I think a lot of times inspectors don't feel
20 empowered, or they maybe feel intimidated, not to ask for what
21 they want to see and be persistent. And maybe that's true, you
22 have to dig through the records, and you can't just rely on the
23 operator to just open their binder and show it to you and
24 you're only going to look at what's in their binder.

25 And so it's experience, it's knowledge of auditing,

1 and that's one of the reasons why we are advocating for not
2 putting more on the inspectors like testing because it's a
3 distraction and it keeps you from doing what you're there to
4 do. Like you have limited time while you're on site, and it
5 should be focused on digging into those records, looking in the
6 buildings, the practices, observing, and really watching what's
7 going on.

8 So I can't like fully answer your question because I
9 know it's so situational but as, you know, having done hundreds
10 of inspections in the past, is that I tried to take charge and
11 say like these are the things that I want to do, ask questions,
12 and if something doesn't seem right, go with it. I mean not go
13 with it and move on, but go like go down that path.

14 And again, that's why one of the suggestions we made
15 is that an inspection report should have a risk evaluation
16 score or something where that inspector should be the one
17 telling the certifier like, hey, this is a medium risk or this
18 one's high risk. Like I did not feel comfortable with X, Y and
19 Z, you know, whatever the situation. But I think we really
20 need to leverage the inspectors for those kinds of activities,
21 determining risk, relying on their observation, and really
22 painting a picture of what's happening in that inspection.

23 And honestly when I first started, we were still
24 doing narrative -- well, when I was working for a certifier,
25 most inspection reports were narratives, and you learned a lot

1 more than the new checkbox-style kind of inspection report. So
2 maybe we need to add a little bit more narrative back into our
3 inspection report so that we can actually convey more than just
4 a yes, no, maybe, and a kind of response. I hope that helps.

5 VICE CHAIR BRUCH: Yeah, that helps. Thank you.
6 Appreciate it, Mike.

7 CHAIR SMITH: Brian, please try to keep it short.

8 BOARD MEMBER CALDWELL: Yeah.

9 Mike, really appreciate your detailed written
10 comments and that you're here today. Question about anaerobic
11 compost. Are your growers using compost made with anaerobic
12 methods? I haven't heard much about that, so I'm just kind of
13 ignorant.

14 MR. DILL: Yeah, I can't tell you what our growers
15 are using, and we put this in our comments because we are
16 fearful that there's a potential that some compost might not be
17 allowed if we do that. I'd have to look at our comments again,
18 but I know that there's like vermicomposts, and there are some
19 other like in-vessel compost practices that might not be
20 aerobic, you know, under aerobic conditions, and therefore
21 would either not be allowed or maybe they're just generally
22 allowed as a permitted non-synthetic. I don't know. Again, we
23 just want to make sure that we've done that risk assessment or
24 the impact assessment on what happens if we limit this to
25 aerobic compost.

1 BOARD MEMBER CALDWELL: Okay. Great. Thanks very
2 much.

3 CHAIR SMITH: Thanks, Mike. Appreciate it.

4 MR. DILL: All right. Look forward to seeing you all
5 in Portland.

6 CHAIR SMITH: Next up is Erin Silva, then
7 Matthew Borbonus, and then Curtiss Newell.

8 Erin, are you there?

9 MS. SILVA: I'm here.

10 CHAIR SMITH: Hello.

11 MS. SILVA: Good afternoon, everyone.

12 CHAIR SMITH: Name and affiliation, yeah, and you can
13 get started then.

14 MS. SILVA: I'm Erin Silva. I'm a professor of
15 organic agriculture at the University of Wisconsin-Madison, and
16 I'm joining you this afternoon to provide some comments related
17 to relisting conventional celery powder as an ingredient for
18 cured meat products.

19 I've been working on the evaluation of organic curing
20 powders for the past six or seven years now, funded throughout
21 that time period from USDA Organic Research and Extension
22 Initiative grants. This funding was able to bring in a diverse
23 team of horticulturalists, myself, and a researcher professor
24 from the University of Florida, agricultural economists, as
25 well as food scientists and meat scientists.

1 So we've been able to conduct a variety of
2 experiments related to more of a systems-based evaluation of
3 organic curing powder, and is the industry in a position to
4 transition from conventional celery powder, curing powders, to
5 organic curing powders.

6 We have found a lot of promising results through this
7 research. A big part of the research was to do field
8 production evaluation both in Wisconsin on heavier soils as
9 well as in Florida on irrigated sandy soils. Throughout this
10 research we've developed and refined some fertility
11 recommendations, finding that to produce a product that has
12 high nitrate levels reaching industry specs we do indeed have
13 to apply more nitrogen than would be for a shelf or fresh
14 market crop, but those levels are not in such an excessive
15 range that it should be a concern for environmental reasons.

16 We still have some challenges related to refining
17 recommendations related to harvest and storage, depending on
18 timing of harvest and processing destinations. This is one of
19 the variables that we still need more research on to be able to
20 create a consistent product.

21 We did find really promising results in terms of
22 quality. In several cases, organic curing powders had a higher
23 quality product from a consumer testing perspective, and we did
24 find positive results in terms of food safety, again, finding
25 in one case organic products actually at a higher level of

1 decreasing pathogens than conventional powders.

2 So whereas it does look like at some point the
3 industry can move in the direction of requiring organic
4 powders, there still is more research to be done to ensure that
5 we have a consistent supply of organic powders that meet
6 industry specs and are consistent with respect to their nitrite
7 levels. So again, I think we have promising results that
8 organic curing powders can result in a higher quality product
9 and one that would meet consumer expectations, but we're not
10 quite ready to move in that direction at this point.

11 CHAIR SMITH: Thanks, Erin. A couple of questions
12 for you.

13 Brian?

14 BOARD MEMBER CALDWELL: Yeah, thanks for being here
15 today. Question about nitrogen levels. What kinds of inputs
16 for nitrogen are you using on these crops, and what kind of
17 levels of N are you putting on the fields?

18 MS. SILVA: Great question. So we've used a variety
19 of sources, so using legume cover crops as well as composted
20 poultry manure and feather meal. So stayed away from sodium
21 nitrate as a product, really trying to look at more of
22 sustainable methods of applying that nitrogen.

23 We are finding that we have to apply levels closer to
24 150 pounds per acre versus more of the fresh market might be
25 more about 120 pounds per acre. So and we're not talking

1 multifold levels of increases, but indeed to be able to meet
2 that industry spec we do have to use more fertilizer than what
3 would be for, again, a fresh market crop.

4 BOARD MEMBER CALDWELL: Oh, thanks. I would have
5 thought it was more. Thank you.

6 CHAIR SMITH: Dilip, I saw your hand up, but now I
7 don't see it up. Do you still have a question?

8 BOARD MEMBER NANDWANI: No, I'm good. She answered.
9 Thank you.

10 CHAIR SMITH: Perfect.
11 Logan?

12 BOARD MEMBER PETREY: Hi, thank you. Quick question.
13 In any of your research you're looking at the analysis of
14 celery that you had final product, do you ever look at vitamin
15 C levels and just some of the studies that said it's an
16 antioxidant for some of the things that nitrates in the body to
17 help combat any negative effects for that?

18 MS. SILVA: We haven't. I wasn't aware of that.
19 That's an interesting point and something to test in the
20 future. But no, we didn't evaluate that component.

21 BOARD MEMBER PETREY: Okay. Because if nitrates are
22 good in beets but they're not good in preservatives, you know,
23 so why would that be? And I've looked at that just on the
24 surface, and it just mentioned vitamin C, that vegetables will
25 have that. That may help it, and that may just be an argument

1 to saying celery powder is better than the conventional methods
2 that we have because it does have that to help fight the side
3 effects of that. Okay. Thank you.

4 MS. SILVA: Yeah, okay.

5 CHAIR SMITH: Thanks, Erin. Appreciate your time.

6 Matthew Borbonus, are you here? And then next up we
7 have Curtiss Newell, and then Scott Stoller.

8 Hello, Matt. Name and affiliation, and you can get
9 started.

10 MR. BORBONUS: Yeah, Matthew Borbonus. I have an
11 organic dairy farm in Western PA. Was just calling in to try
12 to have the meloxicam allowed for use, particularly in
13 disbudding and dehorning calves.

14 Like I usually -- I'm getting to the point where I'm
15 keeping more of my males instead of culling them, and trying to
16 raise them up for organic beef, and it would be pretty helpful
17 to have meloxicam as an additional tool instead of just relying
18 on the lidocaine and some short-time use aspirin and Banamine.

19 CHAIR SMITH: Awesome, short and sweet. Love it. We
20 call that pithy here on the Board. So I do see a hand up for a
21 question from Nate.

22 Nate, go ahead.

23 BOARD MEMBER POWELL-PALM: Thanks for your comments
24 and joining us today, Matthew.

25 MR. BORBONUS: Yep.

1 BOARD MEMBER POWELL-PALM: For your steers, could you
2 speak a little bit to if you have historically used any pain
3 management in castration, and if you feel meloxicam would be a
4 useful tool in the tool box to aid in pain management during
5 the castration process?

6 MR. BORBONUS: Well, typically I band them really
7 young, like a week old, or sometimes the day that they're born,
8 and I do not use pain management for banding for castration.
9 But for disbudding I do, I use a burner, and I always try to
10 use some kind of a pain management for that because it's pretty
11 obvious that they don't like that.

12 BOARD MEMBER POWELL-PALM: Yeah. All right. Thank
13 you so much for your comments.

14 MR. BORBONUS: Mm-hmm.

15 CHAIR SMITH: Thanks so much for joining us today,
16 joining our process, and always a pleasure to hear from
17 farmers.

18 MR. BORBONUS: Thank you.

19 CHAIR SMITH: Okay. Yep, moving on. Curtiss Newell,
20 are you here? Then we have Scott Stoller, and then Erika Rohr.

21 Hello, Curtiss. Welcome. Name and affiliation, and
22 you can get started.

23 MR. NEWELL: Good afternoon. My name is
24 Curtiss Newell. I'm an organic grass-fed dairy farmer residing
25 in Wisconsin. I have been an organic farmer for 19 years,

1 starting the fall of 2005.

2 I would like to speak on behalf of using meloxicam as
3 an effective pain medication in my organic dairy operation. As
4 a livestock owner and caretaker, it is in my best interest --
5 and more importantly in the animal's best interest -- to
6 mitigate pain and discomfort during necessary procedures such
7 as dehorning or disbudding young calves.

8 I currently use lidocaine before the procedure to
9 dull the nerves in the horn bud area before disbudding, and
10 follow this up with pour-on Banamine for longer-term pain
11 control. If allowed to use meloxicam, I would no longer feel
12 the need for pour-on Banamine for this procedure. I would be
13 secure in the dosage and would not have to worry about other
14 calves licking off the Banamine, or the Banamine not getting
15 through to the skin.

16 I do have the opportunity to use aspirin, but I do
17 not use it for this procedure. I do not feel it gives the same
18 longer-lasting pain effects of the Banamine, and it would take
19 a backseat to meloxicam.

20 I have priced meloxicam and found it to be very
21 inexpensive, and while this is never a reason to approve a
22 product for organic use, it would be nice to be able to use an
23 inexpensive product which has great effectiveness on pain
24 management. The meloxicam pills are about the same size as
25 human aspirin pills, and would be easy to administer with a

1 small pilling tube. I would give this to the calves before the
2 lidocaine, and as the lidocaine effect wears off, the meloxicam
3 effect would take over. I have thought I might also use this
4 product during the case of calf scours as I am told this can be
5 very painful to calves, but I would have to consult my vet to
6 get their approval before doing so.

7 I take the welfare of my animals very seriously.
8 When I walk into the barns or out to the field, I take great
9 pleasure and satisfaction when my cows walk up to me and do not
10 run away from me. They have learned to trust us and that they
11 will be treated well. This starts the day they are born into
12 this world, and is why pain management is so important. It's
13 my responsibility to alleviate my animals' sufferings wherever
14 I can. I believe meloxicam would be a great tool in my arsenal
15 for pain management, and I'm advocating for its approval.
16 Thank you for allowing me to speak today.

17 CHAIR SMITH: Thanks for joining us, Curtiss. I see
18 a couple hands up.

19 Kim, go ahead.

20 BOARD MEMBER HUSEMAN: Curtiss, really appreciate
21 your comments today. I'm just curious, how many -- if you
22 don't mind if I ask -- what size of herd do you have in your
23 dairy grass-fed program?

24 MR. NEWELL: No, don't mind at all. We're milking
25 200 cows with about 105 heifers, so a little over 300 animals.

1 BOARD MEMBER HUSEMAN: A little busy.

2 MR. NEWELL: Yeah.

3 BOARD MEMBER HUSEMAN: Do you anticipate that you
4 would use meloxicam on all of your animals, or what kind of a
5 percentage do you think that this tool in your toolbox would
6 come into play?

7 MR. NEWELL: I don't anticipate using it on larger
8 animals. That's not to say that I wouldn't. Again, the pills
9 are about the size of an aspirin, and I've been told that it
10 takes two to three to four pills for young calves. Typically,
11 we disbud at anywhere between seven days and a month old.

12 BOARD MEMBER HUSEMAN: And what percentage of your
13 calves do you have to disbud?

14 MR. NEWELL: We do a little bit of polled breeding,
15 so we have a few polled animals coming through, but right now
16 it's probably 90 percent or more of the calves are being
17 disbudded, of the heifer calves. We don't keep the bull
18 calves.

19 BOARD MEMBER HUSEMAN: Okay. Excellent. Yeah,
20 that's what I was looking for is just kind of that percentage
21 of your herd that you feel like this could be a tool for.
22 Thank you.

23 MR. NEWELL: Yep.

24 CHAIR SMITH: Thanks.

25 Nate.

1 BOARD MEMBER POWELL-PALM: It sounds like, Curtiss --
2 and thank you for your comments -- it sounds like that you're
3 really considering how to manage all pain, and that there might
4 be instances outside of just disbudding that this material
5 would be useful for. And I just wanted to clarify, it sounds
6 like you have a really good relationship with your vets and
7 trust their ability to do their job and prescribe meloxicam as
8 it's needed. Is that correct?

9 MR. NEWELL: That would be correct, yes.

10 BOARD MEMBER POWELL-PALM: Okay. Well, appreciate
11 you, and thank you for the work you do.

12 MR. NEWELL: Thank you.

13 CHAIR SMITH: Thank you for joining us, Curtiss.
14 Appreciate it.

15 Okay. Scott Stoller, are you there? And then we
16 have Erika Rohr and then Kim Dykman.

17 Scott, name and affiliation, and you can start.

18 MR. STOLLER: I am here. I am Scott Stoller from
19 Ohio, and I am on the board of Organic Valley. So I'm an
20 organic dairy farmer here in Northeast Ohio.

21 I also am calling about meloxicam, and it's
22 interesting as I listened to some of the other presenters, I
23 guess I came at it from a different view, so I hope my view is
24 valuable.

25 I grew up conventional, and I used a lot of

1 conventional treatments, and when I transitioned to organic I
2 realized that those treatments were a lot of Band-Aids, and it
3 was often for my management error. So I don't use -- when I
4 first went organic I had a lot of stuff that I wanted something
5 to replace what I used to use.

6 I don't do that anymore, and I'll give you a little
7 history. In 2001, my wife and I -- and we have eight children
8 -- transitioned to organic, and now the thought process is
9 prevent it through management instead of treat it. But I run
10 into an issue here with dehorning calves, and we have a lot of
11 consumers come through and visit the farm every year, and
12 normally I'm -- I don't want to say proud of what I do -- but I
13 am, I'm happy to show them what I'm doing. But the dehorning
14 is one that we just don't show, the disbudding, we just don't
15 show that, and partly because I'm --

16 CHAIR SMITH: Did Scott freeze for everybody else?

17 MS. ARSENAULT: He did freeze.

18 CHAIR SMITH: This is not in the Chair manual.

19 MR. STOLLER: I'm Validus certified.

20 CHAIR SMITH: Oh, Scott, we lost you for about
21 15 seconds.

22 MR. STOLLER: I'm sorry about that. Am I back now?

23 CHAIR SMITH: You are back now.

24 MR. STOLLER: Okay.

25 CHAIR SMITH: I don't know if you could -- I don't

1 remember the last thing you said that I heard, but can you go
2 back like 15 seconds in your --

3 MR. STOLLER: I'll start. I'm sorry about that.

4 BOARD MEMBER HUSEMAN: The last thing you have is I'm
5 happy to show them what I'm doing, but the dehorning one is --

6 MR. STOLLER: Okay. That one, it s nobody likes to
7 see it. We as farmers -- I have about 300 cows -- and we as
8 farmers don't want our consumer to see that. It's worth it to
9 do it because the pain to the animal would be worse if we
10 didn't. I've looked into polled genetics and they're behind on
11 the health traits. So we breed all select semen and then angus
12 on our best genetics, and because the polled genetics are
13 behind, we still have horned animals.

14 So basically what I'm asking is -- especially because
15 my children help me dehorn, and the pour-on Banamine I feel is
16 a danger -- I would like to see meloxicam on the list as a
17 safer alternative for my family and for the calves.

18 A couple of questions you asked before, like do I
19 think I'd use it on other animals? I hadn't thought that far.
20 I didn't really have a need. So my main concern is the small
21 calves, and when my children and grandchildren feed the calves,
22 I don't really like that pour-on Banamine on that calf when the
23 children are working with them an hour later. So I'd like to
24 avoid that if I could, and meloxicam looks like a good
25 alternative for me. Seems to be safe, lasts a lot longer, easy

1 to administrate. And I appreciate consideration for that on
2 the list. Thank you. Any questions?

3 CHAIR SMITH: Looks like a couple, yeah.

4 Allison, I think you were first.

5 BOARD MEMBER JOHNSON: Thank you so much, Scott. I
6 really appreciated your comments and the process of
7 transitioning from conventional to organic.

8 You kind of got at a question that's been on my mind,
9 but I'll ask you it directly. Do you think allowing meloxicam
10 would encourage practices that otherwise wouldn't be happening
11 that are negative? You talked about transitioning from
12 conventional to organic, and looking for substitutes, and then
13 kind of moving away from that over time. My worry in allowing
14 a new material is that you kind of allow proliferation of a
15 practice that's harmful that otherwise wouldn't happen in
16 organic. Do you think that is a risk here?

17 MR. STOLLER: To be honest, when I was transitioning,
18 it probably would have been. It didn't take me long to realize
19 though that it's a completely different mindset in the organic
20 world. And now as the next generation, and actually the two
21 generations come on behind me, they don't even think in the
22 conventional treatment mindset. They don't even go there. So
23 I don't think it would be long-term if somebody did make that
24 error. And in my family, on my farm, it for sure wouldn't be
25 because they are not at all interested in those treatments.

1 BOARD MEMBER JOHNSON: Thanks, Scott.

2 CHAIR SMITH: Nate?

3 BOARD MEMBER POWELL-PALM: Thanks so much for your
4 comments, Scott. As you were thinking about the applicability,
5 how one deploys the medicine, do you feel like this is giving
6 farmers a better tool to have a pain reliever that is not going
7 to be applied via injection?

8 When you think about having your kids do this, making
9 sure it actually gets done, I think a lot of what we've heard
10 is that this is just an easier one to use, and so it'll
11 actually get used, as opposed to if you have 250 plus calves,
12 it might be a temptation to say actually it's just too much
13 work to give that much to flunixin, and so we're just going to
14 skip it. Could you speak to that a little bit?

15 MR. STOLLER: Yeah, ease of application definitely is
16 a thing, especially when it involves needles injection because
17 you have to have somebody older there. I hesitate to even
18 admit that my children do a lot of the disbudding. They're
19 very capable -- and up into teenagers. But when you're
20 thrashing around with a needle and things, it's not ideal.
21 And, yeah, the pill is a lot -- from my perspective it's just a
22 lot nicer. Actually I'm a dairy farmer who lost a hand, so me
23 and needles, the pill would be way better to administer for me
24 than the injection.

25 BOARD MEMBER POWELL-PALM: Really appreciate it, and

1 thank you for your work and the service you give on the Organic
2 Valley board.

3 MR. STOLLER: Thank you.

4 CHAIR SMITH: Thanks, Scott. Thanks for joining us
5 in our process today.

6 Erika Rohr, you are next. Then Kim Dykman, then
7 Neil Edgar.

8 Erika, are you there?

9 MS. ROHR: I am. Can you hear me?

10 CHAIR SMITH: I sure can. Name and affiliation, and
11 you can get started.

12 MS. ROHR: Yeah. Thank you for the opportunity to
13 comment in advance of this 2024 Fall meeting of the National
14 Organic Standards Board. My name is Erika Rohr Luke, and I am
15 a regulatory affairs project manager for ProFarm Group Inc.,
16 formerly known as New Orleans BioInnovation.

17 ProFarm is dedicated to delivering high-performing,
18 biological-based, and sustainable solutions that are safe for
19 people and protect our natural resources. Today I would like
20 to emphasize our written comment on the inert ingredients in
21 the Organic Pesticide Products Proposal in front of the
22 Materials Subcommittee, which concerns the USDA Organic
23 Regulations references to the updated EPA Inerts Ingredients
24 Lists 3 and 4.

25 First, I would like to applaud the NOSB for

1 continuing the work to modernize the system for reviewing inert
2 ingredients and to replace obsolete regulatory references.

3 Thank you.

4 I'm here today to communicate ProFarm's support of
5 Option 2. This is the so-called EPA List of Exceptions because
6 it leverages the expertise of these EPA reviews of inert
7 ingredients, but also allows the Board to limit use of
8 individual ingredients or classes in organic agriculture. This
9 can be through a response to a petition or on its own. It also
10 will reduce the sunset review burden going forward by using
11 categorical listings.

12 In any case, whichever option is ultimately enacted,
13 we do appreciate that the Board would have the ability to adapt
14 the allowed inerts to changing times and also encourage
15 innovations for the benefit of the farming community and all
16 consumers. Thank you for this opportunity to comment and for
17 the Board's commitment to organic agriculture, and the support
18 for growers and the biological tools that they rely on to
19 nourish us and our environment.

20 CHAIR SMITH: Thanks so much, Erika. You have a
21 question from Brian.

22 MS. ROHR: Hi.

23 BOARD MEMBER CALDWELL: Thanks, Erika. Do you have
24 any idea of how many new inert substances that your company
25 would like to add that currently are not being used in organic

1 approved pesticides? Like how many new materials are we
2 thinking about that might be added after we go through this
3 process?

4 MS. ROHR: Everything that we formulate with is
5 currently allowed under the normal List 3 and 4 Tolerance
6 Exempt allowed on 205. So we're not looking to add anything
7 from what's currently in.

8 BOARD MEMBER CALDWELL: Okay. Because we've heard
9 that some formulators feel like there were much better inerts
10 that could be used, but they're not on the old List 4 so they
11 can't use them. But you're not really in that situation?

12 MS. ROHR: We personally aren't. Although I mean
13 this same vehicle that would allow the flexibility, right, to
14 evaluate things that may want to be delisted by petition also
15 can be listed by petition.

16 BOARD MEMBER CALDWELL: Yes.

17 MS. ROHR: So it allows flexibility in both
18 directions.

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

20 MS. ROHR: Yeah. Thank you.

21 CHAIR SMITH: Awesome. Thanks, Erika.

22 Next up we have Kim Dykman, then Neil Edgar, and then
23 Amy Vasquez.

24 Kim, are you there?

25 MS. DYKMAN: Hi, I'm here. Can you hear me?

1 CHAIR SMITH: Yes, except it sounds like you are an
2 alien.

3 MS. DYKMAN: Hello?

4 CHAIR SMITH: Oh, there we go. That's much better.
5 Okay. Yes, name and affiliation and you can get started.

6 MS. DYKMAN: I'm Kim Dykman (indiscernible).

7 CHAIR SMITH: Kim? Kim?

8 MS. DYKMAN: (Indiscernible) area, and I just wanted
9 -- you can't hear me? Yeah?

10 CHAIR SMITH: It just, again, it was like alien, like
11 real slow, and then it would speed up fast, and then slow.

12 MS. DYKMAN: I don't think I'm going to have enough
13 service. Now?

14 CHAIR SMITH: It sounds okay now.

15 MS. DYKMAN: Oh, well, I'll try. I'm in the car, I
16 apologize.

17 CHAIR SMITH: Okay.

18 MS. DYKMAN: This is Kim Dykman, I'm with Agrisecure.
19 I m a consultant for organic row crop farmers in a five-state
20 area, and I just wanted to pass on some concerns that my
21 farmers had given me during the course of the certification
22 process. So a couple of points. They're concerned about the
23 quality of available organic seed. Much of the organic seed
24 that's grown is not grown in their regions and is not grown in
25 the soils and conditions where they farm, so they are just

1 concerned that certifiers are asking for more organic seed, and
2 it's just not suitable for their growing condition.

3 They're concerned that there's a risk point and
4 vulnerability with people using restricted-use pesticides and
5 fertilizers in imported crops, and farmers are expressing that
6 they're concerned about the legitimacy of the imports. Less
7 organic acres are being certified. Farmers are barely breaking
8 even. The playing field needs to be evened out for better
9 access to organic markets.

10 Another point, more testing needs to be done to
11 verify organic imports. We were asking of surprise inspections
12 at the ports, and what percentage of those crops are being
13 tested when they come into our country. And I just hear a lot
14 of guys asking for expanded testing of imports. They think
15 that should be supported in order to catch fraud. Thank you
16 very much.

17 CHAIR SMITH: Thanks, Kim. We got it in.

18 MS. DYKMAN: Okay.

19 CHAIR SMITH: Rough start, but strong finish.

20 Okay. Any questions for Kim?

21 (No response.)

22 CHAIR SMITH: I'm not seeing any hands. Thanks so
23 much for joining our process today, Kim, and for elevating
24 those voices of the farmers you work with.

25 MS. DYKMAN: Thanks.

1 CHAIR SMITH: Neil Edgar, you are up next, then we
2 have Amy Vasquez, and then Tim Dewey-Mattia.

3 Neil, are you there? Yes, perfect.

4 MR. EDGAR: I'm here. Can you hear me now?

5 CHAIR SMITH: I can hear you. Yep, name and
6 affiliation, and you can start.

7 MR. EDGAR: Good afternoon. I'm Neil Edgar. I'm the
8 executive director of the California Compost Coalition. I'm
9 also here on behalf of the U.S. Composting Council as a board
10 member, and my comments here are in addition to written
11 comments that were also provided.

12 Our CCC members are predominantly service providers
13 from municipalities throughout California who process yard
14 trimmings and increasingly food materials to meet landfill
15 diversion goals prescribed in SB-1383, our landmark methane
16 avoidance legislation. Under SB-1383, compostable materials
17 collection programs are changing rapidly to meet organic waste
18 landfill diversion mandates. Most programs are currently or
19 will soon be collecting compostable packaging along with food
20 waste generated at both residential and commercial sources.

21 Many jurisdictions mandate reusable or compostable
22 takeout containers used by restaurants for food not consumed on
23 premise. As organic materials diversion programs grow
24 dramatically over the next several years, the importance of
25 providing clean, organic compost at agricultural markets will

1 increase immensely.

2 Agriculture is the single largest market for compost
3 in California with over two-thirds share now, and it remains
4 largely untapped. Agricultural production standards for fresh
5 produce continue to elevate under pressure from restaurants,
6 grocers, and other entities in the food production and
7 distribution industries in response to consumer demand. Most
8 farmers, both conventional and organic growers, are requiring
9 compost they purchase to be in compliance with NOP standards.

10 We commend the Crop Subcommittee for all of their
11 hard work on responding to the BPI petition and their
12 August 13th proposal regarding compost. We're fully supportive
13 of the recommendations to revise the definition of compost and
14 updates to the technical parameters which will better align NOP
15 regulations with other regulatory standards already in place
16 across the U.S.

17 We support requirements for compostable polymers to
18 undergo an evaluation and petition process, as each individual
19 material has unique properties, production processes, and may
20 have varying outcomes in composting systems and soils. We
21 would however like to see some clarification in the list of
22 allowed paper and fiber materials in the list of synthetic
23 substances for use in organic production, specifically section
24 205.601(c) which currently only states as compost feedstocks,
25 newspaper, or other recycled paper, without glossy or colored

1 inks.

2 Many of the current paper packaging products cannot
3 be considered recycled paper. Even napkins, paper towels, and
4 other basic paper products used in food service may not become
5 composed of recycled content. It may have no potential impact
6 on compost quality, that those that are.

7 Additional definition is thoroughly needed as to
8 which paper and fiber food service ware products are allowed.
9 Both USCC and CCC, among others in the packaging production
10 world, I'm sure would be happy to work with NOSB staff to
11 provide additional information for consideration in expanding
12 the section.

13 Appreciate the opportunity to provide comments and
14 look forward to the deliberations and recommendations from the
15 Board next week in Portland.

16 CHAIR SMITH: Awesome. Thanks, Neil. Couple
17 questions for you.

18 So Nate, go ahead.

19 BOARD MEMBER LEWIS: Thanks, Neil, for the comments
20 and support for the work thus far. I think we're intending on
21 continuing the conversation related to those compost feedstocks
22 and paper, and so appreciate kind of getting this conversation
23 started or going here.

24 I'm curious, your comment related to the polymers,
25 should we be evaluating and listing each polymer individually

1 by its chemical compound, or is there a role to like rely on
2 some ASTM standards as is suggested by that industry?

3 MR. EDGAR: I don't believe that the ASTM standards
4 truly reflect a lot of the things that are typically being
5 considered through the NOSB process. You have PLA which is
6 manufactured from corn substrates, you have PHD which is made
7 from a variety of materials including natural gas. And how
8 those products perform in composting systems -- while they may
9 meet ASTM standards -- there's a wide variability in what we
10 see at the composter level in how they process, the length of
11 time it takes. And then what kind of residual microplastics or
12 other residual might be in the compost system is still being
13 evaluated, and it's being evaluated in real time through a
14 number of programs that are looking at field testing of those
15 materials. But I think it's fair to evaluate them individually
16 as they move through your process there, and in fact we
17 recommended that to a number of those manufacturers about a
18 dozen years ago. So we're still supportive, and we're still in
19 that same position.

20 BOARD MEMBER LEWIS: Okay. Thank you very much.

21 CHAIR SMITH: Mindee?

22 BOARD MEMBER JEFFERY: Hi, Neil, thanks so much for
23 all your work in the compost universe. I'm curious if you are
24 clear on where California landed on the bifurcation. They're
25 collecting plastic and compostables all at the same time, is

1 that correct, and they cannot separate them to collect them in
2 different ways?

3 MR. EDGAR: Correct. The determination that the
4 CalRecycle director had to make was, based upon our current
5 collection systems practices, would it be feasible for
6 California to collect two separate streams of materials and
7 packaging materials, one that was suitable for organic and one
8 that was not.

9 And the determination for that bifurcated approach
10 was deemed not to be feasible, and in many ways the additional
11 collection program elements -- new carts, collection processes
12 at local residences and commercial establishments, new trucks,
13 and separate processing onsite -- those composting operators
14 don't have additional area to be able to manage those materials
15 in a separate stream. So it was not deemed feasible to conduct
16 a bifurcated program in California at this time.

17 BOARD MEMBER JEFFERY: Thank you so much. I really
18 appreciate your work.

19 MR. EDGAR: Thanks.

20 CHAIR SMITH: Thanks for joining us, Neil.

21 Up next we have Amy Vasquez, followed by Tim Dewey-
22 Mattia, and Lynn Clarkson.

23 Amy, are you there?

24 DR. VASQUEZ: I'm here. Can you hear me?

25 CHAIR SMITH: Sure can.

1 DR. VASQUEZ: My name is Dr. Amy Vasquez. I'm a
2 veterinarian currently working with Verizon Organic Dairy as a
3 senior manager of milk quality and animal care. I want to
4 express my sincere gratitude for allowing me to give this oral
5 comment here today. I intend to share my advocacy for the
6 placement of meloxicam on the approved materials list for
7 livestock, specifically for organic dairy farms.

8 I've been in my position working nearly exclusively
9 with small organic farms for over three years. I've been in
10 the dairy industry for about two decades, specifically applying
11 veterinary knowledge for 15 of those years. The next step in
12 my career includes stepping into a professorial position
13 focusing on milk quality and animal welfare.

14 In speaking with several veterinarians and academia
15 that service our local farms here in New York, they are
16 flabbergasted that academic welfare experts are regularly
17 invited to give seminars about the application of basic
18 analgesia for painful procedures on dairy farms because this
19 should be a, quote-unquote, no brainer, and widely accepted
20 here in 2024. However, I beg to argue that this is not a no
21 brainer when it comes to organic dairy farms as they lack the
22 tools in their toolbox, specifically longer-acting, easier to
23 administer pain control.

24 The procedure of removing horn buds, as we've heard,
25 on very young stock is necessary, and it's performed using

1 cauterly, or a burning method, which can be quite painful, as
2 well as the healing process. And meloxicam is a non-steroidal
3 anti-inflammatory with preference for the COX-2 receptors which
4 means it's less likely to cause side effects.

5 The meloxicam tablet is very tiny. It's about the
6 size of an allergy pill and extremely easy to administer. As
7 we heard earlier, it's therapeutic effects can be up to
8 72 hours in young stock which differs greatly from flunixin and
9 aspirin. In fact, vets were provided a letter recently from
10 the FDA notifying them that nearly all forms of aspirin that
11 are currently marketed are unapproved and therefore illegal to
12 use in food producing species, thereby removing one of the
13 tools we had for alleviating pain.

14 And then flunixin is an NSAID that's currently
15 accepted on the organic side but has to be given intravenously,
16 otherwise it can cause deep lesions and infections that can be
17 refractory to antibodies. So think about a farmer trying to
18 find a vein on a wiggling calf, and we've also heard the
19 precautions with the pour-on form.

20 AI also share that I interact regularly with
21 veterinary students, specifically those anticipating working
22 with dairy farms at the Summer Dairy Institute at Cornell, and
23 many have been vocal about their anxiety working with organic
24 farms -- number one, due to their own lack of knowledge about
25 the systems, number two, their inability to use certain

1 conventional products that they believe would be beneficial to
2 animal health and welfare and upholding their oath.

3 So not asking that meloxicam can be put on to appease
4 incoming vets, but I share that as a vet I believe this will be
5 a useful tool for animals that meets the modern day welfare
6 standards. So the time is now to add meloxicam to the list.
7 Thank you.

8 CHAIR SMITH: Nailed it, right at the time. You ve
9 got a couple of questions.

10 Wood.

11 BOARD MEMBER TURNER: Amy, thanks for your comments.
12 I really appreciate it. And I want to just say I've really
13 appreciated hearing from so many folks about this material, and
14 I've been really surprised actually to hear about it just in
15 the context, and to learn about it in this process, just given
16 everything we've heard. And I'm just curious if you have a
17 perspective on what's taken so long for this material to be
18 petitioned?

19 DR. VASQUEZ: I don't have a general perspective in
20 that the perspective that I have is that I've been working with
21 the team, and we've been collectively working as a group with
22 other processors, and we did try to petition for it at the last
23 meeting, and I'm not exactly sure what the hesitation was but
24 it was removed from the last meeting s agenda. And so I'm
25 happy that we're addressing it now, and so I thank you for

1 keeping us on the fall agenda.

2 CHAIR SMITH: Kim?

3 BOARD MEMBER HUSEMAN: Hi, Dr. Vasquez. I really
4 appreciate your comments today. We've heard from a lot of
5 dairy producers where disbudding is a common practice, and the
6 need for this on the dairy -- at the use readily available for
7 disbudding.

8 As a veterinarian, what other types of procedures or
9 cases could you see that this would be an effective tool for
10 veterinarians in their toolbox when applying pain management to
11 animals?

12 DR. VASQUEZ: Yeah, great question. Certainly on
13 young stock castration, on the older animals, lameness,
14 mastitis. There are a lot of -- unfortunately, there are a lot
15 of painful things that can happen to dairy cows in the systems
16 that we have, and so having this as a tool beyond flunixin. If
17 you regularly give a cow flunixin, and if you don't hit the
18 dose appropriately, you can cause gastrointestinal side
19 effects. So it's nice to have something that's more geared
20 towards those specific receptors that won't have the same side
21 effects that flunixin might have.

22 BOARD MEMBER HUSEMAN: Okay. So this could be
23 something that maybe not only at the farm level being
24 prescribed by a veterinarian, but even at a veterinarian
25 practice could be a useful tool in certain circumstances that

1 might be more rare.

2 DR. VASQUEZ: Yes, so if you -- as far as large
3 animals go, like --

4 BOARD MEMBER HUSEMAN: Yeah, I guess we talked about
5 castration from like a very young age, but there's some that
6 might have complications or that are caught later on where
7 maybe they didn't fully catch both in an early phase, and I'm
8 just trying to think of some other rare entities that this
9 could be a useful tool.

10 DR. VASQUEZ: Yeah, certainly a useful tool. And I
11 know that for unconventional farms where they have
12 veterinarians come and dehorn or disbud calves a bunch at a
13 time, the veterinarian would go along and just pop the pills in
14 the calves' mouths, and then go back and do the lidocaine and
15 go down the row. And so it makes the process a whole lot
16 quicker and causes less anxiety when you're trying to restrain
17 them to give them flunixin than giving them a small pill of
18 meloxicam.

19 BOARD MEMBER HUSEMAN: And just a quick shout out to
20 large-animal veterinarians that are constantly on the road.
21 You are heroes.

22 DR. VASQUEZ: I know, and winter is coming, so in the
23 Northeast it's not fun to be out there.

24 CHAIR SMITH: Nate.

25 BOARD MEMBER POWELL-PALM: Dr. Vasquez, I've got pigs

1 on my mind, and I was wondering if you could speak to
2 castration in pigs, and the relative application of meloxicam
3 to alleviate pain in the castration process.

4 DR. VASQUEZ: Ooh, I have to admit I know nothing
5 about pigs, but yes, there are some goats in the backyard.
6 Goats would, yeah, goats can have meloxicam, so --

7 BOARD MEMBER POWELL-PALM: All right. Thank you.

8 DR. VASQUEZ: Sorry for that.

9 BOARD MEMBER POWELL-PALM: No worries. Thanks for
10 your comments.

11 DR. VASQUEZ: Thank you.

12 CHAIR SMITH: Thanks for taking the time today.

13 Okay. Tim, are you there? Then we have
14 Lynn Clarkson, and then Jackie DeMinter.

15 Hi, Tim. Welcome. Oh, yes, I can hear you. Yes,
16 yep, name and affiliation and you can start.

17 MR. DEWEY-MATTIA: Dewey-Mattia -- almost had it
18 before with the pronunciation. Napa Recycling and Waste
19 Services. So we are a compost operator, a recycler, and a
20 hauler in Northern California. And I want to thank everyone on
21 the Board again for inviting me and others out to Milwaukee in
22 the spring to be on that compost panel. It was really
23 beneficial for us. I hope it was beneficial for you. I want
24 to keep this conversation going. I don't want to bury that.
25 This is an important conversation, very urgent, talk about

1 composting, kind of updating the feedstock information, and
2 kind of where we are in the current moment.

3 Neil gave a good kind of summary of a lot of the
4 points just a few minutes ago, so I just kind of want to build
5 on that. Appreciate the work on the proposal, on updating some
6 of the basic compost stuff. I do think that we do need to do
7 more work on fiber, and Neil talked about this.

8 The reality is, to say compostable polymers need to
9 go through the one-by-one review, that just does not seem to be
10 feasible for fiber. Fiber right now, you know, paper products
11 are an alternative to some of these compostable plastics that
12 are used in places that don't allow compostable plastics due to
13 the organic rules, and so if that goes away, then what are we
14 left with? We're left with conventional plastic getting into
15 our compost and then more non-recyclable conventional plastic
16 getting into our recycling systems, which are not outcomes that
17 I think any of us wants.

18 And we're really out here fighting to get more clean
19 compost, more food scraps out of landfills to reduce climate
20 change, add nutrients back to our soils, while having less
21 single-use plastic, not more. And unfortunately, if something
22 doesn't change on what's allowed for feedstocks, just to
23 clarify, we will see more single-use plastic with a lot of the
24 rules going into effect with extended producer responsibility
25 in California.

1 So kind of a few other points just moving forward is
2 how do we get there? And if we are going through the process
3 of NOSB kind of reviewing materials, we're happy to be there to
4 help. I encourage everyone to reach out. And I think there do
5 need to be clarifications on fiber just like what Neil was
6 talking about before.

7 Really that's it, and one thing I want to just stress
8 is, please, if you've never been out to a composting facility,
9 we would love to host you. Please come on out to one of our
10 facilities or another one in your region and see what we're
11 doing. It's really important work to make compost. We're all
12 kind of working to get more organic food grown with organic
13 compost, and also making sure that that packaging on organic
14 food is sustainable packaging, there's less of it, and there's
15 some way to divert it from landfills, and I think that's kind
16 of where it all ties together. So happy to answer any
17 questions, and thanks again.

18 CHAIR SMITH: Great. I see a question from Nate.

19 BOARD MEMBER LEWIS: Yeah, thanks, Tim. Good to see
20 you on the squares here. It was great to see you in person
21 last spring.

22 I'm just curious, in your own facility, do you all
23 differentiate between different types of compostables that
24 maybe all meet of one particular ASTM standard but you're like,
25 well, we like these things but not those things? Or just

1 trying to sort of figure out the best way to batch things to
2 make it both easy but also achieve the goals that we need,
3 because I know there's a zillion things out there that claim to
4 be compostable. Maybe they meet the standards but don't
5 perform exactly the way you want them to.

6 MR. DEWEY-MATTIA: It's a good question. It gets
7 into that bifurcation question as well. And really it has to
8 be batched before it gets to us, right? There needs to be like
9 realistic and coherent rules for customers to put stuff into
10 the different bins, and I think right now that's not the case.

11 Once it gets to us, right, we're going to have to
12 process it. We don't bifurcate, we have one system. We're
13 going to have to have processes -- multiple processes -- to
14 remove things we don't want while making compost so we do,
15 right?

16 So I mean set up right now, right, we have
17 conventional plastic as our number one contaminant. We have a
18 lot of systems to try to remove that while keeping as much
19 organic material in the system. And so currently -- because of
20 the conventional plastic, right, and a lot of compostables
21 which are a small minority of the material get removed -- I
22 mean that's not great, and this is where like this is a long-
23 term process to remove plastics from the compost stream. But
24 kind of one of the things first off the bat is we need to know
25 what's the acceptable alternative, right, and that's kind of

1 what the rule said.

2 But really I think the way of looking at it is there
3 needs to be something coherent with labeling and what's in and
4 what's out like at the consumer, and before it gets to us.
5 Otherwise we're just kind of doing the lowest common
6 denominator and removing everything that acts and looks the
7 same way.

8 BOARD MEMBER LEWIS: Thank you.

9 CHAIR SMITH: Mindee?

10 BOARD MEMBER JEFFERY: Oh, thanks, Tim. Appreciate
11 your presence in the compost land and coming to talk to us in
12 the panel. Thank you for all the great work you're doing.

13 So it sounds like on the bifurcation front, right now
14 California's infrastructure is such that they would -- any
15 contamination that comes in with compost feedstocks, whether
16 it's a compostable package or it's a plastic, it all has to get
17 separated right now because there's no other way to bring the
18 feedstocks to the composters in California.

19 MR. DEWEY-MATTIA: Correct. Yeah.

20 BOARD MEMBER JEFFERY: Right. And so is there a
21 timeline? Is there a steps forward on how we could potentially
22 separate them?

23 MR. DEWEY-MATTIA: Well, really it s just this to me
24 is a bigger long shot than the idea of allowing them in the
25 feedstock in the first place. This is what I've -- so I think

1 the way it would have to work is that if it ends up -- if it's
2 compostable, right, it ends up in the compost container, it
3 comes to us. We could send our rejects, our residual, to
4 someone else who would then reprocess it, right? So say the
5 plastics industry has decided they want our plastic from our
6 compost, and they could pull out the compostable products and
7 then process it, and you could see that seems like a ridiculous
8 process.

9 I just don't see it, especially on the scale that's
10 necessary, as being really a feasible thing. I actually think
11 like if compostable products aren't allowed in the compost
12 stream, then they cease to exist. Because of our rules with
13 65 percent of packaging needing to be reusable, recycled, or
14 compostable, really the only way to get to 65 percent of it
15 being composted in this case is for it to flow through our sort
16 of municipal systems into facilities like ours. Otherwise,
17 it's like little kind of boutique systems that don't really hit
18 those targets, kind of like dropping off plastic bags at the
19 grocery store.

20 So it didn't really -- and I don't know, I mean
21 unless the laws change, really it's either in the mix with
22 everything or it's not allowed. Like otherwise I just don't
23 see anybody able to pick it up unless someone wants to find
24 another fourth bin, but it's so prohibitively expensive, like a
25 fourth bin for compostable products at the curb. I just don't

1 see it as realistic.

2 BOARD MEMBER JEFFERY: So in California right now,
3 even if some forms of compostables were allowed in organic
4 compost, there isn't a way for you to receive them that way?

5 MR. DEWEY-MATTIA: Well, we can -- if they were
6 allowed we would receive them, and then we could do what we can
7 do on our end to process it and allow those through the system,
8 right? I mean we still need to reduce -- part of it is we re
9 getting all those conventional plastic out of there, so that's
10 a long-term thing.

11 In the short term, I mean if it's allowed in our
12 system and we could process it with our organic compost, then
13 we could have our human sorters allow the compostable products
14 that are visibly differentiable past them on the sort line,
15 right? (Simultaneous speaking) and so forth.

16 BOARD MEMBER JEFFERY: I see. So California could
17 potentially pick it all up and bring it to you, and you could
18 potentially sort it because you have human sorters at the
19 facilities who can see the difference in the packaging?

20 MR. DEWEY-MATTIA: As long as the packaging industry
21 were to fund that kind of thing, and that seems expensive, but
22 right. Yeah, if there's a way for us to allow these things,
23 and they're properly identified -- it's a lot of ifs, right --
24 but then there's a way where we can compost it. But right now,
25 that's sort of cut off from us because we're not even allowed

1 to compost it.

2 BOARD MEMBER JEFFERY: I hear you. Thank you so
3 much.

4 MR. DEWEY-MATTIA: You bet.

5 CHAIR SMITH: Allison?

6 BOARD MEMBER JOHNSON: Thanks, Tim. I appreciated
7 you and Neil both flagging paper products as an area that can
8 be kind of confusing. I think just paper is natural and not on
9 the list because it could go right through, but I presume,
10 speculating, that there are a number of materials that may come
11 along with paper packaging materials, like glues or some
12 categories that we should be keeping in mind here.

13 Are there any particular substances that you're aware
14 of that we should be taking a look at along with a focus on
15 paper if we're heading in that direction as a priority area?

16 MR. DEWEY-MATTIA: Yeah, so I mean currently right
17 now, right, it says newspaper or recycled paper, which is very
18 vague and has been interpreted in a lot of ways. But really,
19 recycled paper to us means something that's been made of
20 recycled content, kind of what Neil was talking about.

21 So dealing in uncoated papers, I think that's
22 something that we have a high confidence that we can compost.
23 Right, if you're talking about glues, adhesives, stickers, that
24 brings up -- that's a different product that's added onto it,
25 and that's something that you want to make sure is not part of

1 it. So, right, I mean this is the thing I think that would be
2 good to have a continued discussion on, and what's the
3 appropriate way to kind of determine whether or not a fiber
4 product is allowed or not, and it might be something where
5 there's just some clarification on what's not on there, right?
6 There's not a synthetic label, there's not a liner -- a
7 synthetic liner -- or something like that.

8 BOARD MEMBER JOHNSON: Okay. Really helpful. And I
9 have had the pleasure of visiting your facility, and it was
10 really eye-opening, and I appreciated that, so echo your
11 invitation to anyone who wants to learn the industry more.

12 MR. DEWEY-MATTIA: Awesome. Thank you.

13 CHAIR SMITH: Thanks, Tim. Appreciate your time.

14 Lynn Clarkson, are you there? Then we have Jackie
15 DeMinter, then Kestrel Burcham.

16 Hello, Lynn.

17 MR. CLARKSON: Hello. Lynn Clarkson, CEO of Clarkson
18 Grain Company, Illinois.

19 The U.S. organic seal is offered as an international
20 standard. Unfortunately, it doesn't mean the same thing
21 everywhere because regulatory enforcement varies from good to
22 terrible with political geography. Discovering and proving
23 fraud is difficult. Inside the U.S., the organic community has
24 access to a functioning judicial system, good commercial codes,
25 excellent third-party testing, and a free press. Outside the

1 U.S., the NOP's best intentions run into local reality and
2 embedded corruption. In such areas, we lack the tools to find
3 truth and punish fraud.

4 Inside the U.S., we fine and jail those found to have
5 committed fraud. Outside, I don't see fraud being penalized.
6 Once in a while, someone loses his organic certificate, but
7 penalties that would discourage fraud are missing. As a
8 consequence, foreign sourcing has become the way to profit from
9 organic fraud. Either it's the party committing the fraud or
10 the buyer taking an unjustified price advantage. The recent
11 NOP warning about organic soy coming from West Africa is an
12 example of the whack-a-mole frustration of tempering collective
13 sales and conventional crops as organic. Profit incentives,
14 unchecked by fear of penalty, encourage fraud.

15 What's my window on this? My company makes organic
16 lecithin for such sensitive products as baby food. To protect
17 that supply chain, we residue test. We use test labs in the
18 United States and the EU. We find residues and pesticides
19 legal in the United States, illegal in the United States, and
20 illegal everywhere except some third-world countries. We find
21 residues that go beyond tolerances for even conventional crops.

22 The huge wave of foreign-sourced organic soybeans
23 flowing into U.S. toll processing plants contaminates the
24 entire U.S. system. At times, it has become almost impossible
25 to find clean, organic soil in the U.S. My conclusion?

1 There's way too much pesticide residue arriving on foreign-
2 sourced soybeans. Fraud is common. Testing is expensive,
3 necessary, but effective.

4 So what can I do? How can we bolster organic
5 integrity and minimize fraud? We need the enforcement that the
6 NOP can apply here in the U.S., with acknowledgment that best
7 efforts elsewhere are not going to be as good. I'm now
8 suggesting to consumer product clients that they pair the U.S.
9 organic label with another label, U.S. Farmed. Developed by
10 the American Farmland Trust, it means that 95 percent of the
11 labeled product was raised on a U.S. farm under U.S.
12 regulations. It is a simple but powerful claim verified by
13 SDS, a well-respected international company.

14 Organic consumers here and abroad could enjoy the
15 benefit of U.S. enforcement, quality assurance, and
16 environmental sensitivity. U.S. farmers would be recognized
17 for the higher standards to which they are held. It will
18 require no change in rules, no government action, no fraud
19 committee meetings. It takes nothing away from organic. The
20 NOP itself might be delighted. Thank you.

21 CHAIR SMITH: Appreciate it. Any questions for Lynn?
22 I see one from Amy.

23 VICE CHAIR BRUCH: Lynn, thanks for your time today.
24 I appreciate all the information that you provided and your
25 commitment to integrity.

1 The organic program is a public-private partnership,
2 and it was interesting to hear about the highlights with the
3 U.S. Grown label. I wanted to see, we heard about benchmarking
4 with the EU, with their regulations, we heard benchmarking with
5 FDA. Can you explain the value for the USDA program to
6 benchmark with private industry to make the systems more robust
7 for integrity? Could you talk to that, please?

8 MR. CLARKSON: Amy, I'm not familiar with the efforts
9 of doing that, but the private -- well, we have some people who
10 are very keenly interested in integrity and think they get the
11 best integrity from products raised here in the United States.
12 They've given up on the ability to do things really well in
13 third-world countries around the world. So they wish to
14 acknowledge that the regulatory world works better here, and so
15 they wish a standard that recognizes that. I think any of them
16 would be happy to benchmark with any U.S. regulatory agency.

17 VICE CHAIR BRUCH: Thank you, Lynn. And then last
18 question on residue testing. You mentioned the importance of
19 that, especially since some of the products you're working with
20 go into the baby food lines. Do you see that there's an
21 evident line of demarcation between fraudulent applications of
22 pesticides versus unintentional or drift-direct type scenarios?
23 Is there a line of demarcation in the testing results?

24 MR. CLARKSON: We see so many pesticides. If we can
25 isolate a supply from the United States, it's pretty much

1 drift, and it doesn't seem to be very significant. But if we
2 find pesticides that aren't allowed in the United States,
3 aren't used in the United States, we're pretty sure that's
4 coming in with imports. And if we find ones that are not
5 allowed anywhere in the world except a few countries, we're
6 pretty sure that came from overseas.

7 So we are not seeing a significant problem when we
8 can isolate domestic production. Our difficulty is we're so
9 overwhelmed by the influx of foreign soybeans, it is hard to
10 find just U.S. production. And when we find something that
11 doesn't meet our standards, we reject it. Where does it go?
12 My best guess, it goes right back into the organic world to
13 users who don't want to know because they know it creates a
14 problem, so let's just use it.

15 VICE CHAIR BRUCH: Thank you, Lynn.

16 CHAIR SMITH: Thank you so much for spending some
17 time with us today, Lynn. Appreciate it.

18 MR. CLARKSON: You're welcome.

19 CHAIR SMITH: Jackie DeMinter, you are up next, then
20 Kestrel Burcham, then Colehour Bondera, then we're going to
21 take a break.

22 Hi, Jackie. Name and affiliation, and you can start.

23 MS. DEMINTER: Good afternoon. Thank you for the
24 opportunity to comment. My name is Jackie DeMinter, and I am a
25 certification policy manager at MOSA. We certify 1,775 organic

1 operations in the United States. MOSA is invested in upholding
2 organic integrity and doing our part to help grow the organic
3 sector, practically and in an achievable manner. My comments
4 will focus on risk-based certification and residue testing, and
5 then close with the need for practical expectations on the
6 administrative end.

7 We appreciate the need to develop NOP guidance for
8 these topics so we can apply the concepts uniformly. We agree
9 with the principle of using a risk-based system for many
10 standards requirements. Implementing risk measures for lower-
11 risk operations in order to reduce the length of an inspection
12 is an area of opportunity. For example, the inspector could
13 adapt their audits, inspect fields on a rotational basis, or
14 forego the lengthy drive to the home of a virtual business
15 owner to conduct an onsite inspection every year. Maybe every
16 three years is enough for site verification.

17 There is room for some discretion without cutting
18 corners in actual compliance verification. Aligning certifiers
19 to target testing and inspections without the need for NOP
20 compliance directives that ask for costly additional work would
21 be a good use of time and of industry-wide risk-based
22 verification. We would have a more significant impact on
23 organic integrity in the industry rather than meeting arbitrary
24 compliance requirements that take significant resources and
25 efforts to accomplish. Testing most of the clients has not

1 revealed fraud in any real sense, and we'd like to see an
2 effort to minimize the unintended negative impact on small
3 farms that test positive for residues that clearly aren't
4 application of a prohibited substance.

5 Clarifying intended outcomes would be a big gain for
6 organic integrity. In an ideal world, we would zero in our
7 compliance efforts on a unified approach on specific markets,
8 commodities, and areas of production. It is important that
9 certifiers have uniform guidance regarding residues to be
10 tested, including realistic penalties for the residues tested,
11 and including sanctions for existing threats such as drift
12 events.

13 In closing, we hope to catch your attention regarding
14 change fatigue. While we understand the need to progress the
15 organic industry forward in areas where weaknesses are exposed,
16 we encourage NOSB and NOP to make sure the asks for more are
17 absolutely necessary to protect organic integrity, and the gain
18 to be realized is clear for all stakeholders. When changes
19 significantly create more work for us and our clients, we need
20 time to implement them effectively and completely. We greatly
21 appreciate this discussion and the opportunity to find
22 efficiencies elsewhere in the process as we follow. We
23 appreciate the NOSB and all of your hard work.

24 CHAIR SMITH: Thanks, Jackie. Question from Nate.

25 BOARD MEMBER POWELL-PALM: Thanks, Jackie. I think

1 it's been surprising to me this round to hear how risk
2 assessment is mostly being looked at as to how do we do less
3 for less-risky farms. Flipping that, do you see with less
4 being done to less-risky farms that more can be done, then, for
5 more-risky farms, and how do you see sort of that allocation of
6 resources playing out for your clientele?

7 MS. DEMINTER: That's a big question. Yes, to both
8 of them. Yes, lower, less expectation perhaps for some things
9 for lower-risk operations, not to cut corners on integrity, to
10 be clear. We're not looking to cut corners. We're looking to
11 make it realistic and practical for the small farms that maybe
12 don't have to have the most rigorous set of audits there
13 possibly could be for their very simple 100 percent home-based
14 grown feed, on-farm type operation.

15 And high risk operations, yes, that would then free
16 up some of that unnecessary maybe time spent on those lower-
17 risk operations to be used for those more important compliance
18 measures and actually like purposeful gain that we could then
19 have instead of just we've got to do this work, and we need to
20 do it all, and we have to get it all done, and we need to do it
21 in a certain amount of time. We do now have the ability to kind
22 of focus our efforts and say imports maybe are an area of focus
23 and we want to zero in on that.

24 Certifiers that certify a lot of importers can zero
25 in on those. We can zero in on our clients that buy from those

1 importers, and we can like secure the whole supply chain and
2 focus in on that and hit a more purposeful gain, in my way of
3 thinking, to the intended outcome. Like we want to deter
4 fraud. We want to see imports come in with integrity and be
5 actually certified organic if that's the area we're focusing.

6 So let's all zero in our efforts during this
7 timeframe on that effort and make it a substantial grab instead
8 of all certifiers test 5 percent of your clients in a
9 relatively random manner, and some risk and some complaints and
10 stuff like that coming into it, obviously. But it's purposeful
11 doing work for the gain and the benefit is what I think I'm
12 zeroing in on and having come through the implementation of SOE
13 and everything we do has to have that attainable goal and
14 purpose in what are we doing this for, and I want to be able to
15 feel and realize that. And when we're doing residue testing,
16 when we're talking about the lengthy inspections that we spend,
17 what parts of those could we realistically and practically
18 reduce that would save money, time, energy, effort, and allow
19 us to focus the gain for integrity where we're actually going
20 to get it.

21 BOARD MEMBER POWELL-PALM: Thank you so much for the
22 consideration you've given us. Appreciate you.

23 CHAIR SMITH: Amy?

24 VICE CHAIR BRUCH: Yeah, thanks Kyla.

25 Jackie, thanks for your time today. I just want to

1 follow up on that you mentioned about coordinating efforts and
2 we talked about the what. How do we accomplish that Jackie?
3 That sounds really interesting to me.

4 MS. DEMINTER: Gosh, well, there are so many forums.
5 It's interesting you would ask. ACA might be a really great
6 forum to coordinate efforts. NOP does a really great job of
7 connecting with certifiers, sending out memos, sending out
8 collaboration or communication to us. But it's the collective
9 like here's the goal, now let's all get on the same page about
10 the how to do it. And I really -- not that I want to volunteer
11 ACA for a lot more work, they are doing a fantastic job -- but
12 that is the organization that all of us NOP accredited
13 certifiers are a part of that could facilitate and be an
14 organization to center our efforts through.

15 Just one way, I mean even just -- I mean here's Zoom,
16 here we all are, and we're all in the same meeting, and we're
17 getting together, and we're making the NOSB time valuable with
18 all of our comments -- and that any of that could happen. NOP
19 does webinars, put a webinar on, coffee with the deputy.

20 These things, they have talked about it, but we
21 haven't actually like started to have efforts toward those
22 compliance measures that we want to do without having NOP
23 directives tell us exactly what to do, when to report, how to
24 do it, and all of the pieces that they need us to do and we
25 should want to do. But it would be great to absorb that

1 compliance work within the work that we already do for
2 compliance measures instead of on top of it, as I spoke in my
3 comments, and to see all of us kind of rallying around that
4 same effort.

5 The livestock directive is one that I think of that
6 did rally certifiers around the same measurements, but it was
7 through the directive that really was a lot of extra effort.
8 And if we could get our efforts together without that
9 significant on top of the rigorous work we all already do, that
10 would be, I think, a benefit for the overall industry. We're
11 then focusing on the integrity thing -- the livestock
12 directive, if you will -- instead of also doing all of this
13 other compliance work that we have to do.

14 VICE CHAIR BRUCH: Thank you, Jackie. Appreciate
15 that.

16 CHAIR SMITH: Thanks, Jackie. You've got my wheels
17 turning already.

18 MS. DEMINTER: I think there's so many ideas, and
19 none of them -- throw them against the wall and see what
20 sticks.

21 CHAIR SMITH: Yeah, for sure. Okay. Appreciate you
22 being with us today.

23 Kestrel Burcham, you are next, then Colehour Bondera,
24 then we'll take a break.

25 MS. BURCHAM: Hi.

1 CHAIR SMITH: Hello, Kestrel. Name and affiliation,
2 and you can start.

3 MS. BURCHAM: All right. I'm Kestrel Burcham. I'm
4 the policy director for the Cornucopia Institute. I will focus
5 my comment on the inherent risk in allowing soilless production
6 under the organic seal.

7 First and foremost, despite the organic standards
8 requiring soil-based practices, soilless produce continues to
9 grow in the organic market. This soilless production exists
10 within a regulatory vacuum. Organic products cannot meet a
11 consistent standard while soilless production exists alongside
12 the requirements for soil. OFPA does require this consistency.

13 Allowing soilless production under the organic label
14 is also misaligned with the existing rules. From a regulatory
15 standpoint, this puts the organic marketplace on shaky ground.
16 It's not clear which regulations apply to which products. This
17 has already created huge schisms in the marketplace that go to
18 the heart of organic integrity.

19 Inconsistencies in crop production practices and
20 their enforcement have several detrimental effects. First,
21 producers can have significantly different production costs for
22 the same organic product, causing economic unfairness. Second,
23 certifiers cannot apply rules consistently when soilless
24 production apparently exists within this regulatory vacuum.
25 And third, in some cases consumers are unaware that not all

1 organic products are grown in soil, resulting in consumers
2 paying for an attribute they are not receiving.

3 We are headed toward another market failure, if we
4 are not there already, because soilless organic production is
5 allowed without any regulatory basis. When the issue of
6 inconsistency arose in the livestock realm, the organic
7 livestock and poultry standard was finalized to help cure this
8 issue. We need to act to cure this issue as well. This schism
9 must also be resolved to move forward with any form of risk-
10 based certification, because how do you calculate risk for
11 soilless operations when they're operating outside so many of
12 the organic standards?

13 Finally, one of the organic agriculture's strengths
14 is the emphasis on soil health. Many studies now definitively
15 show that soil-fostering practices found in organic regulations
16 are the basis for all sustainable farming. For example, a
17 recent study confirmed that compost and manure applied to the
18 soil directly fight global temperatures through boosting carbon
19 sequestration. How can we continue to argue that organic is
20 climate smart when we haven't dealt with this issue?

21 The Cornucopia Institute continues to support the
22 organic agriculture is soil-based position statement, which we
23 have provided in our comments previously. Organic farming is
24 soil-based, and hydroponic and container production is
25 incompatible with regulations as they stand.

1 Thank you for your hard work, time, and continued
2 work in supporting organic integrity. This is a valuable issue
3 that we hope will be addressed soon. Thank you very much.

4 CHAIR SMITH: Thanks, Kestrel. Any questions?

5 (No response.)

6 CHAIR SMITH: I m not seeing any. Thanks for being
7 with us today and for your comments.

8 MS. BURCHAM: Thank you.

9 CHAIR SMITH: Colehour, are you there?

10 MR. BONDERA: I am.

11 CHAIR SMITH: Awesome. Name and affiliation, and you
12 can start.

13 MR. BONDERA: Aloha. My name is Colehour Bondera, a
14 farmer of Kanalani Ohana Farm in Honaunau, Hawaii. Organic
15 Kona coffee, cacao, avocados, and many other fruits and
16 vegetables make up our diversification of our small-scale, real
17 organic certified farm.

18 Though not easy, I was able, thanks to my wife, to
19 take a significant unpaid break from my job as a farmer and
20 serve on the NOSB from 2011 to 2016. Thanks for accepting my
21 testimony. Thanks as well to the efforts of the National
22 Organic Coalition and to Beyond Pesticides for needed support
23 and leadership. My testimony is about the past and how we can
24 make things better in the future.

25 I want to thank you for having in-person testimony.

1 I do wish that my testimony fit into the live schedule, the
2 limits mean that those of us who can only, quote-unquote, just
3 make this happen.

4 It seems that the NOSB can take a look through the
5 lenses of the Policy Development Subcommittee and the Policy
6 and Procedures Manual and determine if there is a more fair way
7 to ensure that testimony is received from local farmers as the
8 meetings move around the country. Perhaps, for example, three-
9 and-a-half days of meeting time and/or a percentage of the
10 slots held for actual farmers.

11 Now, to some of your present considerations. First,
12 the title of an early piece of work, What You Don't Know Can
13 Hurt You: Inert Ingredients in Pesticide Formulations, which I
14 compiled as an undergraduate student while with NCAP in Eugene
15 in 1986, 1987. Since then I have been flabbergasted that the
16 honesty of organics still includes allowance for inert
17 ingredients and formulations which only protect capitalism.
18 The excuse is the default for not considering the chemical and
19 health realities of full formulations, and I raise this as an
20 important subject to be brought to a conclusion. Organics is
21 not about hiding, and inerts is a synonym for deception. We
22 must consider all inputs.

23 The fact that we must look at the whole picture
24 reminds me after many decades that we can and should by now
25 have achieved the availability and guarantee that all seeds and

1 starts used for organic production are organic. The NOSB must
2 put forth policy which requires these to be accessible to the
3 little guy, so to speak. Small demand does not mean ease to
4 access, but the NOP can and should determine how to encourage,
5 subsidize, and truly require such materials to be available at
6 all times to all producers. This is a simple chicken and egg
7 question. And since organic and organic seed comes first,
8 together let's make that available and therefore required.

9 Though not in my written testimony, my final topic is
10 about why so many farms have sought out real organic
11 certification. The answer is simple. We are required to
12 nurture the whole system and to have soil improvements as
13 organic producers. Hydroponics can happen, but it's not
14 organic, and NOSB must work with the NOP to correct this error
15 that is now over five years in the making. Remove hydroponics
16 from permitted practices, as NOSB has done repeatedly.
17 Permitting hydroponics only waters down what is perceived as
18 organic.

19 In 2024, everything is still not organic, and
20 together we must show that we care about true organic producers
21 and ensure that those committed are based on the founding
22 principles of organic. Thank you.

23 CHAIR SMITH: Thanks, Colehour.

24 Questions for Colehour.

25 (No response.)

1 CHAIR SMITH: I do not see any hands. Thanks for
2 joining us today.

3 MR. BONDERA: We'll see you in Portland. Aloha.

4 CHAIR SMITH: Okay. Great.

5 We are going to take a break. We're going to come
6 back at 25. Thank you. Enjoy your break.

7 Oh, sorry. After the break, Mark McHargue,
8 Ben Jackle, and Margaret Scoles.

9 (Recessed at 4:14 p.m.; reconvened at 4:25 p.m.)

10 CHAIR SMITH: Okay. Welcome back, everybody. We are
11 in the final push.

12 (Pause.)

13 CHAIR SMITH: Okay. Next up is Mark McHargue, and
14 then Ben Jackle, and then Margaret Scoles.

15 Mark, are you with us?

16 MS. ARSENAULT: Kyla, I just got a message that Mark
17 is dialing in. I don't see him on the line just yet.

18 (Pause.)

19 MS. ARSENAULT: Still not seeing him at the moment.

20 CHAIR SMITH: Okay. Maybe we can catch him at the
21 end. Since we're behind, I would like to keep us moving.

22 Oh, okay, sorry. I almost got excited, but it's Ben.
23 Still excited, but I thought we were getting a surprise. Okay.
24 Yeah, we'll see if we can catch Mark at the end.

25 Ben, name and affiliation, and then you can get

1 started.

2 MR. JACKLE: Okay. My name is Ben Jackle, and I'm
3 representing the Materials Review Team at MOSA in these
4 comments. First, a quick thank you to the NOSB for all of your
5 ongoing work. As always, we appreciate the opportunity to
6 comment. In addition to my oral comments today on DL-
7 methionine and iodine, I'm happy to answer any question on
8 MOSA's written comments concerning carbon dioxide, compost-
9 induced mutagenesis, and inerts.

10 Annotations of nationalist materials often have a
11 significant impact on our review process. Therefore we welcome
12 consideration of the necessity and clarity of each annotation
13 as part of the sunset process. In the case of DL-methionine,
14 we both appreciate the flexibility that this proposed change
15 would provide to our certified producers and note that this
16 change would also reduce the amount of paperwork that our
17 certified operations must complete, and the amount of time that
18 MOSA's reviewers and inspectors would spend verifying
19 compliance with this particular restriction.

20 If implemented, we will have more flexibility to
21 address the areas of these operations that we identify as the
22 most critical for maintaining organic integrity. Having this
23 flexibility is especially important in light of the numerous
24 additional requirements that have come with the implementation
25 of SOE and OLPS.

1 On the other hand, the impact of the proposed iodine
2 annotation is not as clear. MOSA follows the ACA Materials
3 Working Group Best Practice document when reviewing iodine.
4 This guidance generically allows any complexing agents included
5 in the iodine formulations. Our hesitation regarding support
6 for this annotation is specifically based on the fact that it
7 restricts the more general class of alkylphenol ethoxylates, or
8 APEs, as opposed to the more specific subset of nonylphenol
9 ethoxylates, or NPEs.

10 Based on our reviews of numerous inputs containing
11 iodine, we are aware that the industry has reformulated many
12 products such that they are now free of NPEs. We are not sure
13 that all of these products are also free of APEs. Verifying
14 that numerous products are free of APEs when we already know
15 these products are free of NPEs will end up in many additional
16 hours of work that may not ultimately exclude any additional
17 products from organic production. Therefore, we support an
18 annotation limiting the use of NPEs in the formulation of
19 iodine but would appreciate additional consideration before
20 prohibiting the more general class of APEs.

21 Furthermore additional, more thorough consideration
22 of APEs may allow for a general prohibition of these materials
23 from organic production. Specifically, the proposed annotation
24 would prohibit APEs in iodine formulations but does not
25 necessarily give certifiers a regulatory standard which would

1 prohibit the use of APEs as excipient ingredients in livestock
2 health products or, for that matter, as inert ingredients in
3 crop pesticides. Thank you for this opportunity.

4 CHAIR SMITH: Thanks, Ben.

5 Brian, please go ahead.

6 BOARD MEMBER CALDWELL: Yeah, thanks, Ben. Just a
7 quick question. For the more general prohibition of APEs,
8 wouldn't you be able to just consult with an MRO for the
9 evaluation of a material?

10 MR. JACKLE: Well, so it's true. we do rely on
11 reviews by OMRI or WSDA for some, but we actually do a lot of
12 our own product reviews for livestock health inputs. That
13 happens to be one that we end up doing like a lot of our own
14 product composition reviews, and so we are typically reaching
15 out directly to manufacturers to get product composition and so
16 on and so forth for these inputs.

17 BOARD MEMBER CALDWELL: Is that because they are not
18 reviewed by OMRI or another MRO?

19 MR. JACKLE: Yeah, so they could certainly be, and
20 some are reviewed by OMRI, but we don't find it to be that as
21 many are. There's not as great a proportion of the livestock
22 health inputs that have been reviewed by MROs as there are,
23 say, of crop pesticides.

24 BOARD MEMBER CALDWELL: Thanks a lot, Ben.

25 MR. JACKLE: Yeah.

1 CHAIR SMITH: Nate?

2 BOARD MEMBER LEWIS: Yeah, I'm trying to turn this
3 comment into a question to keep it in line with Kyla's rules.
4 But I think the intention of using APEs instead of MPEs in the
5 annotation was to avoid the potential for some formulates
6 currently with normal phenol ethoxylates, we say those aren't
7 allowed. And they go, okay, great, we'll swap into them
8 octylphenol ethoxylates and have basically just as toxic a
9 substance.

10 So I kind of appreciate the additional burden it
11 would cause and, you know, so I just wanted to acknowledge like
12 what the intentionality was behind it, and I appreciate your
13 comment on the topic.

14 MR. JACKLE: Yeah, certainly, and we support that
15 the general direction of that too, and mostly just want to
16 recognize that it's additional work verifying it to the APE
17 standard, and it may -- due to the inability to get all the
18 information on some products -- it may end up not allowing some
19 products that our producers are currently using. So yeah,
20 thanks.

21 CHAIR SMITH: I have a comment too. I'm going to
22 break my own rule. But I believe in the inerts proposal that
23 in Option 2, I believe, that s where there's more of a blanket
24 allowance with certain prohibitions that we call out APEs. So
25 we're trying to connect the dots, and that's just been talked

1 about with the excipient listing as well. So, well, yeah,
2 thanks for your comments. Appreciate it.

3 MR. JACKLE: Thank you.

4 CHAIR SMITH: Okay. Margaret Scoles, you are up
5 next, then Megan Vaith, then Ryan Weeks.

6 Margaret, are you there?

7 MS. SCOLES: I'm here.

8 CHAIR SMITH: Great.

9 MS. SCOLES: Thank you for all your work. Margaret
10 Scoles, Montana International Organic Inspectors Association.
11 We're very grateful for the discussion on risk-based
12 certification because the foundation of our job as inspectors
13 is risk assessment. We submitted written comments, and listed
14 focal points. A few are noted here. Split operations and
15 parallel production; long, complex, and/or non-transparent
16 supply chains; imported products, especially feed; and
17 unprocessed produce and herbs.

18 Certified organic operations with a larger market
19 footprint inherently pose a higher risk. A single large
20 operation has the potential for accidentally or intentionally
21 introducing exponentially more noncompliant product. The time
22 required to implement a regulation change is often years or
23 even decades from the time the NOSB makes a recommendation.
24 Risk-based certification is needed now. The industry cannot
25 wait.

1 Regardless of whether the NOSB votes on a
2 recommendation to change the rules, there are ways to establish
3 an industry standard quicker. IOIA strongly supports the
4 creation of a working group. The ACA did a fantastic job of
5 providing excellent resources for risk determination for SOE.
6 Now that the industry has had some time to see the results of
7 implementation, our experience can be used to continue the
8 conversation.

9 IOIA encourages the NOP to create guidance and OILC
10 courses that provide information and clarification on risk.
11 Strengthening organic systems training and fraud prevention
12 plans notes vulnerability is not the same as risk.
13 Vulnerability is a weakness, a gap. Risk is the likelihood of
14 it mattering.

15 IOIA agrees and encourages the industry to prioritize
16 time and resources on areas that matter most to the consumer
17 and to the planet. We also commented to the Consistency in
18 Organic Seed discussion document. And yes, we still support
19 the 2018 and 2019 recommendations with some improvements, which
20 we included in our written comment, based on risk and
21 commercial availability requirements.

22 Organic seed options are not growing, and they are
23 unlikely to grow without a stronger regulation that closes the
24 current loophole. The last Organic Seed Alliance survey on
25 organic seed usage showed minimal growth in the use of organic

1 seeds for most field crops. Commercial availability is
2 burdensome for all producers, and verification of seed search
3 documentation consumes a considerable amount of time for
4 inspectors and certifiers, with minimal outcome.

5 Inspectors of crop operations frequently see
6 contracts with buyers of organic crops that specify the use of
7 a specific variety or source of seed. The handler might
8 provide the planting seed and at the same time a letter that
9 says organic seed is not commercially available. Very little
10 organic, open-pollinated and pulse crop seed is available in
11 regions where lots of organic open-pollinated grain and pulse
12 crops are produced. Thank you.

13 C MS. SMITH: Thanks, Margaret. A couple of hands
14 here.

15 Nate, go ahead.

16 BOARD MEMBER POWELL-PALM: Oh, thanks.

17 Thanks for your comments, Margaret. Do you feel with
18 seed that we're struggling a little bit with forces that go
19 beyond regulation, specifically infrastructure? When we look
20 at seed consolidation in just the places that we get seed,
21 would you say that looking at forcing organic seed upon farmers
22 with deeper regulation is the answer to, say, in Montana,
23 getting more wheat and barley seed available, or should we be
24 looking somewhere else? What do you see as being the catalyst
25 that would get more local seed available and then more local

1 organic seed available?

2 MS. SCOLES: Well, this is maybe not a popular
3 answer, but the current rule is not working. If the intent is
4 to get people to use more organic seed, the commercial
5 availability clause is creating too big of a loophole.

6 Now, I realize it can also cause a lot of hardship
7 for producers. If we suddenly required all organic seed, it
8 wouldn't work either. But what we're doing is not improving
9 and increasing the use of organic seed because it's really
10 about price. I don't think it's about access. I've actually
11 seen producers where I'm pretty sure they know where they can
12 get organic seed, and they get documentation from three places,
13 that they can't get it, on purpose. So it makes it very hard
14 for a legitimate organic seed grower company if they're raising
15 the seed and simply people are using excuses for not using it.

16 BOARD MEMBER POWELL-PALM: Thank you.

17 CHAIR SMITH: Allison?

18 BOARD MEMBER JOHNSON: Thanks, Margaret. We've been
19 thinking about the handler role, and I've heard that handlers
20 are telling farmers what they need to grow, but I had not heard
21 that they're actually doing the commercial availability search
22 and providing that letter.

23 One possible solution was to apply the commercial
24 availability requirement to handlers in addition to growers but
25 it sounds like, from your perspective, that would not solve the

1 problem. And I'm curious if you have other thoughts about how
2 we engage the handlers in this puzzle.

3 MS. SCOLES: I don't know how to solve the problem.
4 I don't, and I wish I did. But I do think there is a genuine
5 problem that people are intentionally not using organic seed,
6 and it's a very common thing for contractors too. And it is,
7 as we said in our comment, it's open-pollinated seed. I live
8 in Montana where most of the organic wheat is not hybrid, it's
9 open-pollinated. There's not a reason that you couldn't get
10 organic wheat seed other than there's just a big incentive not
11 to use organic because of the price difference. And I do
12 frequently see letters from buyers that provide that seed
13 documentation to their growers, and that seems to be a problem.
14 I wish I knew how to fix it, but it is a problem.

15 BOARD MEMBER JOHNSON: Okay. Thank you.

16 CHAIR SMITH: Amy.

17 VICE CHAIR BRUCH: Thanks, Kyla.

18 Margaret, thanks for your time today. You mentioned
19 on risk-based certification about long, complex, or non-
20 transparent supply chains, and I've heard that a lot. I know
21 we have SOEs being implemented.

22 How do we get more transparency in this area? It
23 just seems the organic industry prides itself on transparency
24 and identity preservation, and then on the contracting side we
25 have this thing called long, complex or non-transparent supply

1 chains. Can you speak to that?

2 MS. SCOLES: Probably not so well other than there
3 are a lot of entities that do -- they don't want to share. I
4 mean, there's business reasons to be non-transparent and to
5 avoid being cut out as a middle person, and I think that's
6 probably the main reason it's happening. It's not necessarily
7 that there's anybody trying to do anything wrong, but the lack
8 of transparency is just business because things change hands so
9 many ways and so many times and so many countries and borders.

10 And even coffee can, you know, it seems like a very
11 simple thing, but it can be purchased by somebody that never
12 sees the coffee and resells it to someone who sells it again,
13 and who knows where it is all that time? It's a good question.
14 I wish I had an answer.

15 VICE CHAIR BRUCH: Thank you, Margaret. I appreciate
16 that.

17 CHAIR SMITH: Kim?

18 BOARD MEMBER HUSEMAN: I lowered my hand, but I'm
19 going to go ahead and ask this. And I don't know if there's a
20 response to this, but is there any kind of a mechanism to
21 understand price spreads between conventional and organic seed
22 prices? I'm actually really not looking for a response. It's
23 just really throw the question out there, I guess. That's why
24 I lowered my hand.

25 MS. SCOLES: A lot of the cost is -- as Nate kind of

1 touched on -- is access, and it's transportation because you
2 see people many times, it's not really the fact that the seed
3 isn't available, it's that the transportation cost would be
4 exorbitant. And I don't know how to answer growers who
5 frequently say, well, isn't it true that if you can't find it
6 closer than 300 miles, you don't have to use it? And it's
7 like, well, that's a nice idea.

8 BOARD MEMBER HUSEMAN: Right.

9 MS. SCOLES: I don't know that that's true. You
10 should talk to your certifier about it. But generally, I think
11 the transport is a lot of it.

12 BOARD MEMBER HUSEMAN: Right. And I mean seed's kind
13 of a broad category, right, between liquid and illiquid -- and
14 I use that term loosely in the organic space in general. But
15 when we talk about one particular seed versus another, there
16 could be a vast difference, I assume, in availability there
17 too. Good food for thought. Thank you very, very much for
18 your comments today, Margaret.

19 MS. SCOLES: And thank you all.

20 CHAIR SMITH: Thanks, Margaret. Appreciate it.

21 Megan Vaith, you are up next, then Ryan Weeks, and
22 then Yesenia Fuentes.

23 Megan, are you there?

24 MS. VAITH: I am here. I don't know what's going on
25 with my camera that my face can't pop up no matter how I change

1 my background. So apparently I am grass, but I am here, unless
2 you guys are seeing different than I am.

3 CHAIR SMITH: Yeah, I was going to say you are in
4 some - yeah, you are in grass, but we can hear you, so you can
5 get started.

6 MS. VAITH: That's as good as we're going to get it.

7 Okay. I will get started. Hi. My name is Megan
8 Vaith, and I own Northbourne Organic Crop Insurance where I
9 work with multiple organic farmers on the insurance options
10 they have available to them. Crop insurance has been an
11 important risk management tool used for years, and has
12 progressively become more popular in the organic industry.

13 Crop insurance has been a hot topic recently in
14 multiple workgroups I've been a part of. I believe this is for
15 two main reasons. One, commodity prices are low, and farmers
16 want to make sure they're covered, and two, most FSA disaster
17 program payments are now requiring crop insurance, forcing some
18 farmers to purchase it even if they haven't had it in the past.

19 I believe we all know that crop insurance is pretty
20 straightforward for the conventional farmer. You take the
21 proven yield times the coverage level times the price to get
22 your guarantee. You would think it would be the same for the
23 organic farmer, but there are so many more variables that go
24 into it. What if the field is full of weeds which drags the
25 yield down? What if the farmer has a no-till operation, and

1 the insurance company doesn't recognize that as a good farming
2 practice? What if she has been farming conventionally for
3 years and wants to transition to organic, but the crop
4 insurance coverage is so low that it would take a complete
5 wipeout to collect?

6 I think it's time to take a step back and start to
7 analyze why the subsidized program is not used more widely
8 among organic growers like it is for their conventional
9 counterparts. I believe this could be attributed to a few
10 different reasons. Number one, farmers can't truly do
11 enterprise units by organic practice. There was a major
12 release recently stating that there was a big enhancement which
13 made crop insurance farmers eligible for enterprise units by
14 organic practice. In theory this sounds great, and it's
15 actually what I've been wanting for years.

16 However, this only splits organic versus
17 conventional. This in no way helps the farmer that is
18 transitioning more ground, as the transitional acres will
19 automatically be enterprised with a certified organic ground as
20 it is all considered organic. For this to be truly effective
21 for these farmers, they need to split up the transitional
22 organic acres as well.

23 Coverage during the transition period is not adequate
24 during a very risky time for the farmer. Why can't we make
25 sure they at least have a decent insurance policy in place that

1 will cover them in case a disaster strikes?

2 Number two, T-yields. I believe this has been talked
3 about many times but we still haven't seen a resolution. On
4 average, the county T-yields for organic crops are only
5 65 percent of the T-yields for conventional crops. Where is
6 the research to show that organic farmers are truly only
7 raising 65 percent of the conventional yield?

8 The third point is good farming practices. Over the
9 last year, I have seen a large uptick in audits on organic
10 policies which are considered random. Almost all of them have
11 fallen into the good farming practices category where they put
12 the farmer through a grueling interview process questioning
13 every farming decision. If he answers one question in a way
14 they don't like, they will automatically deny the crop
15 insurance claim. I had three claims denied last year alone
16 that should have been paid out.

17 In the past it used to be if the farmer followed what
18 was written in his organic plan, he was good to go. While I
19 don't believe this is the best way to handle it, there should
20 be a little more leeway for these farmers. For example, a
21 farmer no-tilled wheat into a field that was in an extreme
22 drought because he didn't want to lose any more moisture. He
23 was denied a crop insurance claim solely for his decision to
24 no-till, where nowhere in the crop insurance handbook does it
25 say that the farmer could not no-till his wheat.

1 CHAIR SMITH: Thanks, Megan.

2 Any questions for Megan? I see one from Nate.

3 BOARD MEMBER POWELL-PALM: Thanks so much for your
4 comments, Megan. I think you said that the T-yield -- as we've
5 all sort of highlighted before -- the T-yield automatic
6 assignment of a lower T-yield to organic is punitive. Would
7 you say that there is a better formula that we could entertain
8 that takes into account a producers' conventional history that
9 might inform their future organic history?

10 MS. VAITH: I think it absolutely should. I know
11 that we've been fighting for that for years. Like if a farmer
12 is transitioning from conventional to organic, if his
13 conventional ground -- like maybe he's raising 120 percent of
14 the conventional county T-yield -- why can't we just start him
15 out at 120 percent of the organic T-yield?

16 But like back to the basics, I just don't understand
17 why generic-wise we're saying that organic is 65 percent of
18 conventional. I'd just like to see in good research where
19 organic farmers are statistically only getting 65 percent of
20 the yields of conventional farmers to get some reasoning as to
21 why we decided this once upon a time.

22 BOARD MEMBER POWELL-PALM: Well, I'd say we have an
23 economist on our team, so we're going to have to stick her on
24 that one. Thank you, Megan.

25 MS. VAITH: Yes.

1 CHAIR SMITH: Thanks, Megan.

2 Up next is Ryan Weeks, then Yesenia Fuentes, and then
3 Aaron Hobbs.

4 Ryan, name and affiliation, and you can get started.

5 MR. WEEKS: Yeah. My name is Ryan Weeks. I'm an
6 organic farmer from South Central Nebraska. Just wanted to
7 make a few comments today regarding what's going on in the
8 organic industry. We're fighting prices right now that are
9 very depressed because of what we believe are fake imports
10 coming into the U.S. and impacting our supply.

11 One of the things we'd really support is, you know,
12 for us as an organic farmer, our process we go through to get
13 certified and make sure that the product that we're providing
14 to the American consumer that we say is organic is organic.
15 It's a very daunting process. We take a lot of time. We go
16 through it. There's penalties. There's consequences if you
17 don't do it right. There are not those consequences for people
18 who are importing these products that we believe are probably
19 not organic and are getting into our food supply.

20 In my mind, that creates a food safety issue here in
21 the United States. We've been telling the consumer we have the
22 safest, best, most nutritious food source, but if we're not
23 going to actually take care of and make sure and test every
24 single organic product being imported into the United States,
25 we're lying to the consumer because we're allowing this to come

1 into our processes, and we're allowing it to come into our food
2 supply, which creates a food safety issue for consumers here in
3 the United States.

4 I'll use a quick example. We export popcorn through
5 Preferred Popcorn here in Nebraska. The process to get
6 certified to import our product into the EU is robust.
7 Everything's tested. It's got to be traced all the way to
8 field level. It is robust. It's difficult. It's hard. We do
9 it because they ask us to, because they want to export that
10 product because it's a static market here in the United States
11 that they have most of. Okay?

12 We need to find some way here in the U.S. to ensure
13 that we're providing our consumer with the safest, most
14 nutritious, best product. The EU gets all the good product.
15 We get all the junk here because the fact is we don't test. We
16 do not make sure that that product coming into the United
17 States is certified organic.

18 I agree a lot with what Lynn said earlier about the
19 fact that there's repercussions here if we don't do things
20 right. There's no repercussions anywhere else in the world.
21 Okay? I appreciate the opportunity to talk to you today and
22 testify. I would say this is a super-important issue for the
23 American organic farmer. We need our pricing to be above our
24 cost of production, and right now that is not the case, and
25 it's because we have that amount of imports coming in.

1 I'm going to use one example. I know I'm going to go
2 over my three minutes here. But the implied yields per acre of
3 country of origin in the U.S. organic beans coming out of the
4 country of Nigeria equates them to a 400 bushel per acre yield.
5 The top quarter of U.S. organic producers produce 60 bushel an
6 acre. The average in the U.S. is 37. Thank you.

7 CHAIR SMITH: Thanks, Ryan. I see a question from
8 Kim.

9 BOARD MEMBER HUSEMAN: Hi Ryan. I hope that harvest
10 is going or has gone or is going or will go well for you.

11 MR. WEEKS: Thank you.

12 BOARD MEMBER HUSEMAN: We're October 17th here. I'm
13 assuming you've been to the thick of it.

14 MR. WEEKS: We've done some. We've got quite a
15 little left, but we're getting there.

16 BOARD MEMBER HUSEMAN: Okay. Can you speak to your
17 crop rotation? You mentioned popcorn. It's a very specialized
18 product. What other crops do you have in your rotation
19 currently?

20 MR. WEEKS: So we grow organic blue corn, organic
21 popcorn. We grow organic yellow feed corn, organic yellow food
22 corn. We grow organic wheat that goes directly into the food
23 supply. We grow organic soybeans. Most of those are feed
24 soybeans. So but that's the majority of our crop rotation
25 right now. We did do some barley, but like all farmers, we try

1 to go to the market and what's going to pass.

2 BOARD MEMBER HUSEMAN: Okay. That's where my next
3 question was going. Can you identify the crops that you're --
4 so two questions. I'll try to make this very succinct. Can
5 you identify which part of your rotation you are seeing the
6 biggest struggle with finding an end user or a customer that's
7 able to take the product at a price that makes sense to you?

8 MR. WEEKS: Yellow corn, and soybeans, and wheat.

9 BOARD MEMBER HUSEMAN: So the feed side of the
10 market.

11 MR. WEEKS: Feed or food. They're all dead right
12 now.

13 BOARD MEMBER HUSEMAN: Feed or food. Okay.

14 MR. WEEKS: Hard, hard market.

15 BOARD MEMBER HUSEMAN: And I'm going to highlight the
16 fact that we can actually start exporting products to help
17 farmers too. Probably not maybe the directive, but I think
18 additional outlets to help create some competition in the
19 spaces of value. So, appreciate the work that you're doing to
20 help see that market continue to expand as well. Thank you for
21 your time and your efforts, and good luck with the rest of your
22 harvest.

23 MR. WEEKS: Yeah, thank you, Kim.

24 CHAIR SMITH: Amy?

25 VICE CHAIR BRUCH: Yeah, Ryan, thanks for your time.

1 Actually, Kim, I was going to turn it back to you to ask your
2 question to Ryan about seed costs that you were asking
3 Margaret. That might be a really good thing to learn here, so
4 thanks.

5 BOARD MEMBER HUSEMAN: Okay. Ryan, you might not
6 have been on earlier but --

7 MR. WEEKS: Part of it.

8 BOARD MEMBER HUSEMAN: Okay. Yes, so spreads in
9 values, and you can have the floor. Go ahead, please.

10 MR. WEEKS: Yeah, I'll tell you, in addition to being
11 a farmer, I've also been a seed salesman now for ever since I
12 was in college. We're now a Beck s dealer in Nebraska, who
13 also has Great Harvest Organics. Great company.

14 They have organic products, but their problem is it's
15 the quality issue. And the thing is, I try to raise just as
16 good of organic crops as I raise conventional crops, and
17 there's nothing worse than getting your crop off to a bad
18 start. And if you don't have high quality, high germ, really
19 good seed to begin with, you're not going to have an end
20 product that is, one, high production, two, high quality, and
21 three, something that you can move into the market.

22 And we've tried organic seed. I used to grow organic
23 seed corn for a company called Seedtech, and I'm going to tell
24 you right now that is the most difficult thing I have ever
25 done. It is super difficult because we use flammers. Sometimes

1 that delays the females too much, and the male might accelerate
2 because you flame it, and then all of a sudden you miss the
3 nick and you don't pollinate.

4 So the cost of production on organic seed corn is
5 through the roof. It's super expensive, and that also passes
6 on down to the farmer. So I can sell non-GMO, certified,
7 untreated seed. By the time we go through all the discounts,
8 we're probably down around \$180 a bag, sometimes \$175. If I
9 were to sell organic seed, which is not as high quality, not as
10 good a seed that I sell to the organic grower, you're going to
11 be talking in the \$300-a-bag range, so it is a significant
12 cost. Each of those bags unirrigated plants 2.5 acres, so you
13 guys can do the math.

14 BOARD MEMBER HUSEMAN: Thank you. That was my next
15 question. I really appreciate that information. I'm a numbers
16 person, so this is very helpful.

17 MR. WEEKS: You bet. Anytime.

18 CHAIR SMITH: Thanks, Ryan. I appreciate your
19 comments today.

20 MR. WEEKS: Yeah, thank you. Thanks for letting me
21 speak today.

22 CHAIR SMITH: Yesenia, are you there?

23 MS. FUENTES: Yes, I am. Can you hear me?

24 CHAIR SMITH: I sure can. Name and affiliation, and
25 you can get started.

1 MS. FUENTES: My name is Yesenia Fuentes, and I am
2 from the industry side.

3 Dear members of the National Organic Standards Board,
4 thank you for your service, considering the needs of all
5 stakeholders. As a family-owned manufacturer of biodegradable
6 disease control products, BioSafe Systems supports the
7 following points across crops, handling, livestock, and
8 materials subcommittee.

9 In regards to inert ingredients, we urge the NOSB to
10 adopt a proposal allowing inerts classified by the EPA in
11 exempt from tolerance requirements. This change will
12 facilitate much-needed innovation for maintaining environmental
13 and human safety. Current regulations cause delays that hinder
14 product development for organic producers. We support the
15 EPA's comment, and favor Option 2, which leverages EPA reviews
16 while allowing NOSB oversights.

17 Crops, handling, and livestock. We support the
18 continuing listing of hydrogen peroxide and peracetic acid
19 across crops, handling, and livestock. Both substances are
20 effective, eco-friendly sanitizers that can decompose into
21 harmless byproducts, leaving no residues. They are essential
22 tools for ensuring food safety, biosecurity, and effective
23 sanitation in organic systems without contributing to
24 antibiotic or chemical resistance.

25 Ammonium salts in the crops listing are recognized

1 for their safety and environmental impact, being non-toxic and
2 biodegradable. The EPA re-registration eligibility decision
3 confirms that they will not cause unreasonable adverse effects
4 on the environment. Many growers rely on ammonium salts to
5 effectively repel deer, as alternatives such as fencing or
6 natural deterrents often prove impractical and ineffective for
7 larger operations.

8 Thank you for the opportunity to comment. BioSafe
9 Systems is committed to supporting organic agriculture and
10 sustainable practices. Thank you.

11 CHAIR SMITH: Thank you.

12 Any questions for Yesenia?

13 (No response.)

14 CHAIR SMITH: I don't see anything or any hands.

15 Thanks for your comments today.

16 Up next is Aaron Hobbs, then we have Ginny Olson, and
17 then John Sheppard.

18 Aaron, are you there? Hello. Name and affiliation,
19 and you can start.

20 MR. HOBBS: Good afternoon. My name is Aaron Hobbs.
21 I'm the executive director of NCIA, the North American
22 Coalition for Insect Agriculture, and I also run film for the
23 Yorktown freshman football team so I'm sliding out of here
24 pretty quick when we get done.

25 Thanks for the opportunity to talk today. I doubt

1 that I'll take my full three minutes. We, as the North
2 American Coalition for Insect Agriculture, have really
3 appreciated working with the NOSB, getting to know and
4 understand the processes, and within the NOP and the organic
5 community. We appreciate the opportunity to continue to do so.

6 My comments today -- or our comments today -- are
7 about methionine, and our concern is it feels like the current
8 direction of the NOSB will create a preference for nonsynthetic
9 sources -- I'm sorry, will create a preference for sources
10 other than natural sources in non-synthetic form.

11 So what we are looking for, we don't believe that the
12 standard needs to be relaxed and that we would like the
13 opportunity to see and create -- we think there's enough
14 methionine available through the insects and allow insects to
15 be a non-synthetic form of methionine. Sorry, I've not said
16 that correct until I got it right this time.

17 But again, insects are a growing industry. We've
18 talked about it over several meetings now, and we know there's
19 been a lot of discussion about that, but we think that we do
20 have a source that's available and don't think that the current
21 direction is the right one and don't think that the standards
22 need to be relaxed.

23 So again, as we continue to grow together, we're
24 excited about the opportunity to work with organics. We feel
25 like we -- our industry, our young industry, and your slightly

1 more mature industry -- have same goals for the environment and
2 for climate, and look forward to continuing to working together
3 and providing new tools to organic agriculture through our
4 industry and the work that we do. And that's it.

5 CHAIR SMITH: Thanks, Aaron.

6 Any questions for Aaron?

7 MR. HOBBS: Nate thought about it, but then he put
8 his hand down, so --

9 BOARD MEMBER POWELL-PALM: Oh, I'll ask mine real
10 quick. How many pounds of crickets or soldier fly larvae would
11 you need to replace methionine? If we're having an inclusion
12 rate of two pounds of methionine per ton of feed, what is the
13 equivalent in insects?

14 MR. HOBBS: Nate, that's a really excellent question.
15 I'm happy to tell you that I have no idea what the answer is.

16 BOARD MEMBER POWELL-PALM: Oh, good. Okay. So then
17 for the follow-up, then could you also look at capacity? If
18 we're saying we have X million birds that are fed organic, are
19 there enough crickets or whatever insect you're thinking is the
20 best replacement?

21 And lastly, is there a world in which you see farmers
22 growing these insects on their own farms, sort of in the spirit
23 of holistic self-containment, so that they would be able to
24 essentially grow their own methionine on their farm to then
25 dehydrate, include in their own rations?

1 And I'll take all of that offline. Thank you, Kyla.

2 CHAIR SMITH: Yeah.

3 MR. WEEKS: So the easiest one to answer is your last
4 question, is 100 percent. As the industry continues to grow,
5 there is ample opportunity for very specific development of
6 insects, whether on-farm or in another setting, with a very
7 specific outcome in mind, whether that's methionine or
8 something else that a farmer needs. I fully expect that we'll
9 have smaller operations that are built specifically on-farm for
10 specific outcomes as well as what we're doing at-scale in a
11 larger capacity.

12 BOARD MEMBER POWELL-PALM: Super. Thanks.

13 MR. HOBBS: Yes, sir.

14 Nate.

15 CHAIR SMITH: Other Nate.

16 BOARD MEMBER LEWIS: Yeah, other Nate here. So
17 Aaron, good to see you again. I've also heard you all sort of
18 enthusiastically support development of production standards
19 for labeling of insects as organic. Is that true?

20 MR. HOBBS: Them sort of being considered
21 agricultural and then therefore part of the organic structure.
22 So I'm just trying to like divide a little bit here because I
23 hear that part of the goals, and then the other part is that
24 you want to be considered the non-synthetic methionine. But if
25 you're agricultural, you have to be organic in a livestock

1 diet.

2 So just trying to like -- if the priority is to get
3 certified as an insect industry, do we need to go that way
4 first before we consider insects a real viable alternative to
5 methionine? I don't know if that made sense in terms of the
6 circuitous route here, but --

7 MR. HOBBS: If I understand you correctly -- and you
8 did not give me a magic wand, but I'm going to pretend like I
9 have one -- I think I'd like to see both. I don't think we
10 should exclude one for the other. The industry is still
11 growing. Again, we do, from our perspective, we have very
12 shared outcomes that we're driving for in insects and in
13 organics at large. And so, I think it would be quite some -- I
14 would not like to see either door closed in the short term is
15 the easy answer, right?

16 We do not have members today that are pursuing
17 organic insects for the simple fact that there is a lack of
18 confidence in having a steady stream of organic feedstock for
19 the insects. I know those conversations have grown in the last
20 couple of years since we've worked together, but today, that is
21 not something that anyone is currently focusing on, again, out
22 of fear of having a consistent stream of organic feed for the
23 insect. And even if that were an organic byproduct, still
24 that's the concern. So I think being able to pursue both of
25 those avenues at the same time would be what we would ask for.

1 CHAIR SMITH: Kim?

2 BOARD MEMBER HUSEMAN: I lowered my hand because
3 Aaron essentially answered my question on growth rate year-on-
4 year. So I'm yielding.

5 CHAIR SMITH: Okay.

6 Nate, Powell-Palm is back again.

7 BOARD MEMBER POWELL-PALM: Real quick. What is the
8 feedstock you all need? The organic feedstock? We have so
9 much grain. Where can we send it?

10 MR. HOBBS: Okay. We can talk offline.

11 BOARD MEMBER POWELL-PALM: And not me personally, but
12 just as you've heard from farmers across the last few days,
13 let s go.

14 MR. HOBBS: Absolutely. So well, how much do you
15 want for it is probably going to be a challenge, right? Part
16 of the value of insects is taking a low-grade product from
17 another part of agriculture or food waste and making and
18 upcycling that into protein and frass. So we have mealworm
19 producers, for example, out on the West Coast, and they're
20 using byproducts from wheat and fruits and veg. So we are
21 starting a relationship with one of the big lettuce producers
22 and one of the fresh fruit and vegetable producers that's
23 processing and packaging and using their byproduct to feed our
24 insects.

25 And so we are, again, if we're buying feed for our

1 insects, especially something that has another use, that's not
2 generally a preferred feedstock, right? Part of what makes
3 insects so intriguing and, again, from our perspective, helps
4 us with our environmental goals and sustainability goals is
5 using something that has low value everywhere else, right? So
6 really upcycling something, not taking your beautiful grain and
7 feeding it in that format.

8 So I think if somebody's processing your grain and
9 there's offtake, whether it's at a mill, wheat nibs, things
10 like that that are organic, that kind of stuff is what we're
11 looking to feed -- that's what we're feeding our insects
12 primarily.

13 BOARD MEMBER POWELL-PALM: All right. Thank you.

14 CHAIR SMITH: Thanks, Aaron.

15 MR. HOBBS: Sure.

16 CHAIR SMITH: Ginny Olson, you are up next, then
17 John Sheppard, and then Rachel Merritt.

18 Ginny, are you there?

19 (No response.)

20 MS. ARSENAULT: Ginny is here, Kyla. We just need it
21 unmuted.

22 (Pause.)

23 MS. ARSENAULT: She doesn't seem to be responding to
24 the message to unmute, so maybe we can continue to work on her,
25 and if you want to move to the next person. It looks like she

1 dropped off. Maybe she's having connection issues, and we'll
2 watch for her to come back in.

3 CHAIR SMITH: Connection issues?

4 MS. ARSENAULT: Yeah.

5 CHAIR SMITH: Okay. We'll move to John Sheppard.
6 John, are you there? Hello, sir.

7 MR. SHEPPARD: Fair enough. Can you hear me?

8 CHAIR SMITH: I sure can. Name and affiliation, and
9 you can start.

10 MR. SHEPPARD: Very good.

11 MS. ARSENAULT: John, I'm just going to interrupt you
12 for a second. Your slides are loading, so if you want to hang
13 on for a second till they re up there.

14 MR. SHEPPARD: Yeah.

15 CHAIR SMITH: Oh, sorry. I missed the highlight on
16 my schedule here. Sorry about that. Okay. They're up now.
17 Name and affiliation, and you can start.

18 MR. SHEPPARD: I'm John Shepard, the president of
19 Sheppard Grain Enterprises LLC. Shepard Grain is in Upstate
20 New York, and has produced organic soybean meal for over two
21 decades.

22 I'm also a director in a domestic trade association,
23 Organic Soybean Processors of America, or OSPA. OSPA advocates
24 for the fair and free trade, specifically the advancement of
25 safe and reliable organic livestock feed. Thank you for this

1 opportunity to address the NOSB, and your service.

2 I've offered a presentation to the NOSB during your
3 spring conference. In that event, first I d spoke of an OSPA
4 Agro Merits mass balance analysis of African organic soybean
5 meal exports relative to the available feedstock and production
6 capabilities. That report identified it is highly unlikely the
7 meal is born of certified organic soybean.

8 Second, I addressed how fraud will destroy the
9 domestic organic soybean market. And third, I talked of the
10 low-price imported organic soybean meal depresses the domestic
11 organic soybean value by at least \$2 a bushel.

12 Today, I'll present two slides. The source documents
13 were submitted for your record. The first slide is quotes from
14 an Argus insight paper on the shrinking profitability of
15 organic farming. Argus calculated an organic farm with corn,
16 wheat, and soybeans in rotation would make merely \$42 an acre
17 this marketing year.

18 They also calculated if production costs remain
19 steady, a market value of August 2024 would net a total return
20 of minus \$213 an acre in the marketing year 2024 through 2025.
21 Argus concludes the retention of existing organic farm
22 operations is at risk. What is noticeably missing is why
23 soybean values are depressed, which obviously is a large supply
24 of imported organic soybeans and meal.

25 The second slide calls out an NOP directive to

1 accredited certifying agents in West Africa, notably the
2 countries of Benin, Burkina Faso, Ghana, Nigeria, and Togo.
3 This directive is an administrative effort to validate the
4 organic integrity of both soybeans and soybean meal exports.
5 The directive is quite comprehensive with deliverables due to
6 the NOP by October 28th. Hopefully, noncompliant certified
7 agents will have their accreditation revoked.

8 A similar NOP directive should be implemented for
9 organic soybeans and organic soybean meal exported from the
10 Black Sea region, which is the predominant source of imported
11 organic soybean meal to the states. Thank you.

12 CHAIR SMITH: Thanks, John.

13 Any questions? Amy, go ahead.

14 VICE CHAIR BRUCH: John, thanks for your time today
15 and information, which was a better story here that you're
16 painting for farmers, but it's one that needs to be
17 communicated.

18 I was wondering from your point of view -- I
19 appreciate that report you submitted from Agri Merits at our
20 last meeting -- but how can the private sector continuously
21 work to inform the NOP certifiers and inspectors of known risks
22 or assumed risks so we can react faster?

23 MR. SHEPPARD: The private sector to inform NOP. The
24 risk -- and I've been exposed to this as well -- you know, I'll
25 do my individual testing, but without the tools for a

1 defensible chain of custody, an individual like me can hardly
2 make an accusation of improper behavior for risk of a libel
3 suit. So it's very difficult without the official enforcement
4 tools and capabilities like an NOP to make a play on correcting
5 bad behavior.

6 This is a step. This NOP directive is certainly a
7 step. It's administrative, but it will have an effect because
8 those that are behaving badly will either choose not to comply
9 and cease to export, or they will comply and validate that
10 they're doing everything correctly, but this will have an
11 effect on exportation of soybeans and soybean meal out of
12 West Africa.

13 The risk is too great, provided that the NOP doesn't
14 take the teeth out of the directive, is willing to revoke
15 certifications, is willing to make it public to the world that
16 they are finally enforcing the proper behavior of exporting
17 organic soybean and soybean meal.

18 VICE CHAIR BRUCH: Thanks, John.

19 CHAIR SMITH: Okay. Moving on to Rachel Merritt, and
20 then we have Cori Skolaski, and then I'm going to do who's our
21 last scheduled speaker, and then I'm going to sweep for who we
22 missed today, and then we'll wrap it up.

23 So, Rachel, are you there?

24 MS. MERRITT: Hi, yes. My name is Rachel Merritt.
25 Can you hear me okay?

1 CHAIR SMITH: I sure can.

2 MS. MERRITT: Okay. My name is Rachel Merritt. I am
3 the lab operations manager at Columbia Laboratories. This is a
4 third-party testing facility out of Portland, Oregon. Our
5 service lines include food, environmental, and cannabis
6 testing. Some of the testing we offer includes microbiology,
7 nutrition testing, soil and water testing, heavy metals,
8 residual solvents, and pesticide residues.

9 I've been overseeing our pesticide testing at
10 Columbia for the last eight years. We offer the NOP 2611-1
11 panel, specific commodity panels, USP 561, and comprehensive
12 multi-residue panel. We see a variety of samples including
13 water, soil, raw commodities, and finished goods, for
14 pesticides.

15 I wanted to give my thoughts on the current NOP testing
16 panel and the 2613 document on responding to results. The
17 current NOP panel includes roughly 200 pesticides. Most multi-
18 residue panels at a well-established food testing lab are over
19 400. I would encourage the committee to look at moving to a
20 more comprehensive list and/or a list based on commodity group
21 types. This means a testing panel specific to that commodity
22 including commonly used pesticides and other substances. By
23 creating testing requirements for any type of product, the
24 results will be more applicable and appropriate to give the
25 product the status of organic.

1 When discussing expanding the list, here's a
2 background on what our labs typically tests beyond pesticide
3 screens including polar pesticides such as glyphosate, diphenyl
4 carbamates, fumigants such as methyl bromide or inorganic
5 bromide, heavy metals, residual solvents, and there's more than
6 that but those are the top ones. I agree that testing needs to
7 go beyond a pesticide screen. Currently, for example, a carrot
8 could have no pesticides detected on the NOP list but could
9 contain a high level of glyphosate, but it could still be
10 deemed as organic.

11 Speaking on the 2613 document for responding to
12 results, specifically the detection without tolerance levels.
13 I routinely evaluate products for the U.S. or EU markets.
14 Generally, the U.S. regulations in the 40 CFR are more vague
15 compared to the EU. They do not get updated often amidst new
16 commodities on the market or new pesticides in use.

17 I know a risk for expanding testing is the risk of
18 more substances found. For positive findings that do not have
19 an established tolerance you could implement something called
20 an ARfD calculation. ARfD stands for acute reference dose.
21 The ARfD of a chemical is an estimate of the amount of
22 substances in food and drinking water that can be ingested in a
23 period of 24 hours. It's a nice way to evaluate the risk to
24 the public health.

25 It also seems that there is agreement that

1 metabolites of substances need to be added to the list. I
2 would suggest pulling the definitions from the 40 CFR for that.
3 In regard to dehydrated, extracted, or concentrated organic
4 products, I agree with looking at a correction factor. While
5 the USP 561 limits can be useful, the panel for this is narrow.
6 I'm looking into how the EU calculates as advised.

7 Thank you so much for letting me talk today. It's
8 important for laboratories to speak on testing decisions since
9 we're the ones working with the clients to ensure that it's
10 done properly.

11 CHAIR SMITH: Awesome. Thanks, Rachel. A couple
12 questions for you here, so hang tight.

13 Nate, go ahead.

14 BOARD MEMBER LEWIS: Th *Gaine Moore* appreciate
15 your perspectives. I had a question related to the solvent
16 extraction tests.

17 MS. MERRITT: Yeah.

18 BOARD MEMBER LEWIS: And I think what we struggle
19 with on that is that we don't particularly have a regulatory
20 hook to hang our hat on, meaning that in the conventional
21 industry there's no real tolerance or limit to the use of those
22 substances that we can take a fraction of like we have for
23 pesticides, for example.

24 And so I'm curious if you have any thoughts around
25 like how we might even start talking about what sort of limits

1 we should establish within organic for something like a
2 synthetic solvent which is not a pesticide, doesn't have a
3 tolerance per se, but is certainly a prohibited substance in
4 our view, in our industry. How do we kind of unravel that
5 rat's nest?

6 MS. MERRITT: Yeah. The only experience I have with
7 solvent regulations is really on the cannabis and hemp side
8 with, you know, we're regulated in Oregon, and we do a lot of
9 hemp testing for different states, and even their lists aren't
10 very applicable for what's actually getting used on the
11 production side of things.

12 I would suggest looking at other countries just to
13 start. I bring up the EU just because I've done a lot of work
14 with their regulations, and they surpass the U.S. currently,
15 and I would think they would have some documents to point to
16 how they regulate their solvents. The more we can make our
17 testing regulations in line with each other, the better for the
18 import and export process.

19 BOARD MEMBER LEWIS: Thank you.

20 CHAIR SMITH: Amy?

21 VICE CHAIR BRUCH: Thanks, Kyla.

22 Rachel, thanks for your time today. Definitely
23 important to have your voice and the lab perspective in this
24 conversation. It was helpful to hear that there's crop-
25 specific panels.

1 I had a question on innovation within lab testing.
2 Are we being able to achieve more rapid results over the years
3 for these samplings so certifiers can react quicker? Is that
4 an area of improvement or focus?

5 MS. MERRITT: Definitely. I mean, that's one of our
6 biggest drives for client satisfaction is our turnaround times.
7 With the innovation of the QuEChERS method for pesticides
8 along with more improvements on the individual substances for
9 metals and solvents, things can get done very quickly nowadays.
10 I mean, we have turnarounds that are five days for all those
11 kinds of testing. Some clients even want a two-day turnaround.

12 So to me the turnaround time is not an issue anymore
13 for a well-functioning laboratory. It really depends lab to
14 lab, but our standard turnaround is five to eight days.

15 VICE CHAIR BRUCH: Okay. Helpful to hear and helpful
16 to hear that there's a two-day turnaround on some. So thank
17 you, Rachel, for your time.

18 MS. MERRITT: Yeah, thanks.

19 CHAIR SMITH: Okay. Thanks so much, Rachel.

20 Okay. Cori, are you there?

21 MS. SKOLASKI: Yes, I'm here.

22 CHAIR SMITH: Hi, Cori.

23 MS. SKOLASKI: Hi.

24 CHAIR SMITH: Name and affiliation, and you can
25 start.

1 MS. SKOLASKI: My name is Cori Skolaski. I m the
2 executive director of MOSA Certified Organic. Additionally,
3 MOSA is the Midwest lead for TOPP.

4 Today, I want to talk about risk-based certification
5 and the Organic INTEGRITY database. With the implementation of
6 SOE, everything is more complex and challenging. We all --
7 certifiers, inspectors, and operations -- are feeling the
8 stress. MOSA works with around 50 contract inspectors, and
9 more and more of them are unwilling to inspect livestock
10 operations because of the increased time and complexity. Our
11 clients are complaining about the increased cost of
12 inspections.

13 We ask the NOP to allow us to implement risk-based
14 certification for lower-risk operations, and my colleague,
15 Jackie DiMinter, spoke earlier today about some great ideas.

16 MOSA values the small family farm, and the goal of
17 TOPP is to increase organic acreage. Yet, this one-size-fits-
18 all approach to certification is a barrier to many operations,
19 especially marginalized farmers and smaller operations that may
20 typically be considered low-risk.

21 And regarding the Organic INTEGRITY database, it has
22 recently been experiencing performance issues and outages which
23 will certainly persist until the NOP addresses the root cause.
24 The INTEGRITY database is now a mandatory part of certification
25 workflow, and the NOP has done a good job of articulating

1 processes to which certifiers must adhere. However, policy
2 language is not the language of technology providers.

3 There are many IT service frameworks that create sets
4 of policies, processes, and procedures for delivering customer-
5 oriented technology services. I don't know if the NOP is
6 utilizing any particular framework, but I have not seen
7 evidence that they are. For example, a common best practice is
8 to assign ticket numbers to incident reports to ensure adequate
9 documentation and for easy reference, but this has not been
10 evidenced in the NOP's tech support.

11 Another example comes from the IT contract management
12 phase. Typically, software service providers publish a
13 service-level agreement contract detailing the use guidelines,
14 reliability, availability, and so forth. I don't believe that
15 exists.

16 Development work is also needed within the INTEGRITY
17 database. The SOE rule helped us streamline our processes to
18 issue certificates until we update the database. We estimate
19 at MOSA that the performance issues and outages will cost us
20 between \$70,000 and \$120,000 in lost productivity this year in
21 the form of rework, workarounds, and delays.

22 The NOP needs to keep going down the practical road
23 for process improvement. NOP addendums must be compliant and
24 list labeling categories, and we'd like to see a data
25 dictionary for quality control. The database has to meet the

1 needs of the organic industry, yet my IT department has been
2 told by the NOP there is no money for any further development.

3 Certifier leadership can be the tip of the spear in
4 unified support of the message that the NOP must have a budget
5 and time to mature its technologies to support the mandated use
6 of the INTEGRITY database. Thank you for your time.

7 CHAIR SMITH: Thanks, Cori. Appreciate it.

8 Any questions for Cori?

9 (No response.)

10 CHAIR SMITH: I don't see any. Thank you so much.

11 MS. SKOLASKI: Thank you.

12 CHAIR SMITH: Okay. I'm going to sweep for folks who
13 we missed earlier in the day. Bradley McNeil, I don't think he
14 is with us, but just double-checking.

15 (No response.)

16 CHAIR SMITH: Everett Codd, I also don't think is
17 with us, but just double-checking.

18 MR. CODD: Hi again.

19 CHAIR SMITH: Oh, yay. Everett, you are back.
20 Awesome. Okay. Name and affiliation, and then you can start.

21 MR. CODD: All right. Everett Codd, regulatory
22 consultant for Chapul Farms, speaking to DL-methionine.

23 Chapul Farms is a black soldier fly larva and insect
24 frass producer. The dried larva are AAFCO-approved poultry
25 feed, and our frass product has been reviewed and is allowed

1 for use in organic crop production.

2 In our process to bring the larva to the feed input
3 market for organic livestock, we have found an absence of
4 relevant organic standards and inconsistent application of the
5 standards by certifiers. The OPLS clarified that invertebrates
6 may be certified under the organic standards at 205-239.
7 However, current production methods for feed insects are
8 entirely indoors, as biosecurity concerns have completely
9 limited that development.

10 Additionally, organic standards regarding care and
11 slaughter for feed insects are completely absent. Aquatic
12 animals and yeast are allowed as non-synthetic sources of
13 methionine, while insects are required to have organic
14 certification.

15 Please do not relax the synthetic allowance for DL-
16 methionine. That is not the policy work needed to support bird
17 health. The Livestock Subcommittee's proposal is misinformed
18 regarding nonsynthetic insect alternatives. This is a market
19 failure, not a development issue. Commercial availability has
20 been blocked due to inconsistent application of the organic
21 livestock standards, and regulatory short-sightedness. Our
22 AAFCO-approved whole insect larva product cannot reach the
23 organic market as a nonsynthetic feed input or as a certified
24 organic livestock product.

25 Bird health has been used as an excuse to increase

1 the allowance for synthetic inputs. Avian species eat insects
2 in a natural setting, yet under the organic standards, soybeans
3 and synthetics are being promoted as the solution to flock
4 health. The policy work needed is a nonsynthetic allowance for
5 insect feed inputs, not increased reliance on synthetics in
6 organic poultry production. Thank you for your consideration.

7 And I can respond to some of Nate's comments and
8 Daniel's comments to Erin.

9 CHAIR SMITH: Nate or Nate, did you want to ask any
10 of your questions that you asked Erin, to Everett?

11 I see a taker. Go ahead, Nate.

12 BOARD MEMBER LEWIS: Sure. And thanks for hopping
13 on. I think I'm just trying to unravel the sort of sequence of
14 events here because I'm totally hearing from you like it's
15 really hard to access the organic marketplace with the product
16 that you have available. And once we get there, I think, does
17 it not make sense that that's the time that chicken farmers can
18 determine whether or not black soldier fly are a good
19 replacement for methionine?

20 I mean I think part of it is just that they just
21 haven't been able to use them because AAFCO, and then now
22 there's ambiguity about whether there's organic compliance, and
23 so until we can evaluate whether or not it's actually an
24 effective alternative, we just need to wait until we go through
25 that regulatory work.

1 MR. CODD: Mm-hmm.

2 BOARD MEMBER LEWIS: Is that accurate? I mean, I'm
3 just trying to make sure I understand the picture correctly.

4 MR. CODD: So in terms of AAFCO, black soldier flies
5 are approved in several different forms, including meal, oil,
6 and whole. We do a whole, dried larva, so there's no
7 processing other than dehydration. So in that sense, we're not
8 trying to change anything within that larger livestock
9 regulatory complex.

10 The issue we're running into with specifically
11 organic feed is that we cannot meet the organic standards due
12 to the production requirements of insects, and that we cannot
13 be considered a nonsynthetic input. So essentially, there is
14 no nonsynthetic source of methionine from insects in organic
15 agriculture. It is an organic source of methionine that is
16 based off of insects in organic agriculture. So that's the
17 disconnect right now is we are allowing fish and yeast as non-
18 synthetics, but insects are being required to be certified
19 organic according to both OMRI and WSDA.

20 CHAIR SMITH: Thanks, Everett. Appreciate your time
21 and for being able to jump back on.

22 MR. CODD: Thank you.

23 CHAIR SMITH: Okay. Mark McHargue, are you here?

24 MR. MCHARGUE: Yes, I am.

25 CHAIR SMITH: Yay. Okay. Name and affiliation and

1 you can get started.

2 MR. MCHARGUE: Thank you. My name is Mark McHargue,
3 and I'm a farmer in the state of Nebraska, and also serve as
4 president of the Nebraska Farm Bureau and serve on the National
5 American Farm Bureau Board as well.

6 So, as a farmer, a couple of things that maybe you'd
7 want to know, especially relative to the Farm Bureau. I was
8 excited when Amy reached out to me to develop a little better
9 relationship. The Farm Bureau is very involved in the organic
10 space. I'm one of the organic farmer that I get to talk a lot
11 about how it's going, how it's working, how the profitability
12 is going. And so we are vested, the Farm Bureau represents all
13 agriculture. It doesn't matter if it's organic, big, small. I
14 just wanted to make sure and visit about that a little bit.

15 And then we also grow popcorn. I think Brian Weeks
16 was on earlier, and we grow for Preferred Popcorn. And one of
17 the things that immediately when they started doing the organic
18 side, they found it very difficult to position that popcorn to
19 get into markets, even like California -- we're in the Midwest,
20 obviously. But they resorted to having to chill their bins
21 through the winter and through the summer, and then also chill
22 during shipping just to ensure that they didn't have any bugs
23 in that shipment.

24 And so when we started thinking about shipping some
25 of these organic products around the world on ships, and the

1 fact that just to ship popcorn from Chapman, Nebraska, we have
2 to chill it to keep the bugs out, I think that might be a
3 little bit of a litmus test.

4 If you have anything coming from any other country,
5 and there's not actually bugs in that product, it would make
6 you wonder if they weren't using fumigants or something in that
7 potentially organic product just because it's so difficult.

8 But I just really wanted to get on to thank you for
9 doing your work, and any questions that you might have relative
10 to the organization or I think the shipment on international
11 trade is really important. I serve on an international trade
12 committee and chair that committee at our national level.

13 CHAIR SMITH: Thanks so much, Mark. Glad you were
14 able to get back on and speak with us today.

15 Any questions for Mark? I see one from Amy.

16 Go ahead, Amy.

17 VICE CHAIR BRUCH: Mark, thank you for your time and
18 engaging in our process. It's really helpful to hear that
19 broader organizations such as Farm Bureau are for all farmers,
20 and there's an organic focus as well an Organic Policy
21 Committee. Can you just briefly highlight maybe some of the
22 things that have bubbled up into conversations at the
23 Farm Bureau level regarding organics?

24 MR. MCHARGUE: Well, I think certainly policy on the
25 international trade side, I've heard a substantial amount this

1 year. Just because you start looking at profitability, when we
2 start selling our products, generally when we contact our
3 buyers, prices depend on what kind of shipment came in
4 somewhere overseas. And I think it's imperative that we
5 continue developing policies relative to receiving imports from
6 other countries, and if they are truly USDA certified, we have
7 to have a way to hold them accountable, or really we just are
8 wasting our time.

9 My son has been doing organics for a number of years.
10 He just called me here a couple days ago and said, man, I just
11 don't know if I can do it. He's growing popcorn, corn,
12 soybeans, like we are, and the prices are just too depressed.
13 And if that is from importation of a product that may not be
14 certified USDA, that's a trap. If they are, you know, it's a
15 free market, but boy, there's a lot of things that point to
16 potentially that not being the case.

17 VICE CHAIR BRUCH: Thank you, Mark, and thanks for
18 mentioning about fumigants. One of the last speakers from a
19 laboratory said that those are types of things that can be
20 tested, so thanks for bringing that up. Appreciate it.

21 MR. MCHARGUE: Absolutely.

22 CHAIR SMITH: Thanks, Mark. Thanks for joining in on
23 our process today.

24 MR. MCHARGUE: Yeah, sorry for being late.

25 CHAIR SMITH: Yeah, no worries.

1 Ginny Olsen, do we have Ginny back on the line?

2 MS. ARSENAULT: I still don't see Ginny, nor do I see
3 her phone number, which was the only way you could get back in
4 after the meeting.

5 CHAIR SMITH: Okay.

6 MS. ARSENAULT: So maybe she s on a number that I
7 don t have for her. I don't think so.

8 CHAIR SMITH: Okay. Great work, everybody. Long day
9 here, but we did it. Thanks for sticking with us. We will
10 reconvene on Tuesday, October 22nd in Portland, Oregon for the
11 NOSB meeting in person, and we will also have a live broadcast.

12 Again, thanks to Michelle, Jared, and Andrea for all
13 the behind-the-scenes tech stuff. You guys are awesome.
14 Thanks, Board Members, for staying focused and asking really
15 good questions, and thanks to all the stakeholders for engaging
16 with us through these two days of the public comment webinars.
17 I know they are long, but they are really valuable.

18 So see you hopefully next week in Portland. Safe
19 travels, everybody. I'm going to go drink some tea.

20 MS. ARSENAULT: Be well, Kyla. You can't get sick on
21 us next week.

22 Thank you, everyone.

23 BOARD MEMBER LEWIS: Well done, Kyla.

24 VICE CHAIR BRUCH: Bye, everyone.

25 (Whereupon, at 5:38 p.m., the Webinar was adjourned.)

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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2024 PUBLIC COMMENT WEBINAR
PLACE: ZOOM
DATE: October 17, 2024

was held according to the record, and that this is the
original, complete, true and accurate transcript which has been
compared to the recording accomplished at the hearing.



Elaine M. LaRosee, CDLR
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2024 MEETING

Tuesday,

October 22, 2024, 8:30 a.m., PST

Hilton Portland Downtown

Atrium Ballroom

921 SW Sixth Avenue

Portland, Oregon 97204

National Organic Standards Board (NOSB) Members

Kyla Smith, NOSB Chair

Amy Bruch, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

Allison Johnson

Nate Powell-Palm

Mindee Jeffrey

Dilip Nandwani

Logan Petrey (Webex)

Franklin Quarcoo

Wood Turner

Javier Zamora (absent)

USDA/National Organic Program Staff

Erin Healy, Division Director of Standards (Webex)

Jared Clark, Assistant Standards Director

Andrea Holm, Agricultural Marketing Specialist, Standards

Devon Pattillo, Agricultural Marketing Specialist,
Standards

Johanna Mirenda, Agricultural Marketing Specialist,
Standards

Heather Kumar, NOSB Technical Support Staff
Standards Division

Dr. Jennifer Tucker, Deputy Administrator, NOP

Michelle Arsenault, Advisory Committee Specialist,

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

2 (Time: 8:28 a.m.)

3 DR. TUCKER: Okay, good morning, everyone. I am
4 Jennifer Tucker, Deputy Administrator of the National Organic
5 Program. Welcome to all of our board members and to our
6 audience in the room and online. It is my honor to officially
7 open the Fall 2024 National Organic Standards Board meeting.

8 Let's start with some official business. This
9 meeting, like other meetings of the National Organic Standards
10 Board, is being run based on the Federal Advisory Committee Act
11 and the Board's Policy and Procedures Manual. I am your
12 designated federal officer. Transcripts for all segments will
13 be posted once completed. So for a little housekeeping, because
14 we are in a new space together, restrooms are out that door,
15 that side, ladies, that side, gentlemen. There is a co-ed
16 bathroom in the middle. Exits are on all corners of the
17 building. If you push these doors, though, loud noises are
18 likely to ensue, so don't push those doors unless you are
19 looking to ensue loud noises.

20 Okay. Let's take a quick look at the agenda. And
21 then I will introduce our welcoming speakers: USDA Under
22 Secretary Jenny Lester Moffitt and the director of the
23 Department of Ag for Oregon, Ms. Lisa Charpiloz Hanson. So
24 welcome and thank you for being with us.

25 After our welcoming speakers, I will introduce the

1 National Organic Program team. Kyla Smith, our Board Chair,
2 will facilitate Board introductions. I do want to note we have
3 five members who will introduce themselves for the last time
4 here as this is their last meeting. I'd like to acknowledge
5 them upfront. We have Jerry D'Amore, Kim Huseman, Mindee
6 Jeffery, Nate Powell-Palm, and Wood Turner. Let's acknowledge
7 them and the rest of the Board at the start.

8 So after some Board reports, we'll do a program
9 update with questions and answers with the Board. We will then
10 hear from members of the Northwest Region of the Transition to
11 Organic Partnership Program, or TOPP. After the break, we'll
12 spend the afternoon listening to public comments. Thank you to
13 all who came to speak.

14 Tomorrow, we'll begin subcommittee work and hear from
15 a leader at NRCS, the USDA Natural Resources and Conservation
16 Service. Subcommittee work will continue into Thursday, and
17 then we'll close with Board elections, farewells, other
18 business, and a look ahead.

19 Now, I am pleased to introduce our first opening
20 speaker. Jenny Lester Moffitt serves as the Under Secretary
21 for Marketing and Regulatory Programs at the U.S. Department of
22 Agriculture. She is a fifth-generation organic walnut farmer
23 and processor and is passionate about supporting agriculture
24 and taking care of the land and the people who farm it.

25 Under Secretary Moffitt has extensive experience

1 advocating for agricultural policy, sustainable practices, and
2 the promotion of domestically produced agricultural products.
3 She has championed policies that support more resilient,
4 diverse, and competitive food systems, and has expanded market
5 access and regional market supply for American farmers.

6 Prior to her role at USDA, Under Secretary Moffitt
7 was the under secretary at the California Department of Food
8 and Agriculture, where she worked on environmental stewardship
9 and rural economic development. She's a graduate of Brown
10 University and the California Agricultural Leadership Program.

11 I want to say personally what a pleasure it has been
12 working with the under secretary over the last several years.
13 So thank you so much for being here.

14 UNDER SECRETARY MOFFITT: Well, thank you, Jenny, and
15 it is absolutely a pleasure to be here and to join with all of
16 you for what are always really important conversations about
17 the policies and the work of the National Organic Program.

18 I want to particularly thank the NOP team members who
19 are here and around the table and the audience who make these
20 meetings happen. They certainly don't happen easily. There's
21 a lot of work involved, and I really want to recognize all of
22 the National Organic Program team members for making this
23 meeting possible, making this meeting engaging, making this
24 meeting really a meaningful discussion and exchange of ideas,
25 because that's what this is about. It's a discussion and

1 exchange of ideas.

2 I'm speaking to the choir here. The National Organic
3 Program, the National Organic Standards, are built on a tenet
4 of continuous improvement, and that means continuous
5 improvement is always needing to be informed by what's
6 happening in the industry, industry expertise, and so between
7 the National Organic Standards Board, as well as everyone who
8 has made the time to be here to provide comment and dialogue,
9 and then is really, really important.

10 So I just want to first off thank the board members
11 for your service. I know it's no easy feat. We ask a lot of
12 each and every one of you, not only to be here, to be present,
13 to listen, and to engage, but a lot of what I'll call the
14 homework that happens throughout and in between all of the
15 meetings, reading, and reviewing material review lists, all of
16 those different policies and programs. So thank you all for
17 your hard work, your time, and your volunteer work.

18 I want to acknowledge, of course, our NOSB chair,
19 Kyla Smith, with Pennsylvania Certified Organic, who serves as
20 a certifier on the Board. Thank you so much. We really
21 appreciate your service.

22 And then, again, I want to thank everyone here for
23 your expertise in providing comments both last week as well as
24 during this meeting as well. Those comments, again, are really
25 critical to informing the department, the secretary as he's

1 making decisions, and then, of course, also the Board that is
2 here today. So as Jenny already recognized, I want to thank
3 and commend the outgoing Board members for your service.

4 Let's see. We've got Jerry. I'm going to just go
5 down the row because it's like the whole spot here is turning
6 out. And Wood and Kim and, of course, me and Mindee. Really,
7 just thank you so much for your service, all that you've done
8 for the organic industry and for your service on the Board. So
9 really, again, I wanted to share extreme gratitude for your
10 time and your expertise.

11 Speaking of Board membership, as I'm sure you're all
12 eagerly wondering, we are reviewing applications. We received
13 really robust applications for the January 2025 appointment.
14 In fact, we received 42 applications. So we at USDA are
15 reviewing those applications, and we'll have announcements
16 forthcoming about who the secretary nominates for that Board
17 later this fall.

18 One of the great benefits of the National Organic
19 Standards Board moving around the country, I think I had the
20 opportunity last time to speak to the Board in, what, two -- I
21 think it was two years ago in Sacramento. But the opportunity
22 for these meetings to move around the country is that it's an
23 opportunity to experience and learn and hear from organic
24 experts in the region.

25 And I think, Dr. Tucker, it might have been the

1 Florida meeting where we first had some of the top partners or
2 somewhere in the southeast. Atlanta. So we had the Atlanta
3 meeting where we had top partners, the Transition to Organic
4 Partnership Program partners, come and talk about the work that
5 they're doing.

6 I think it's really great and a wonderful opportunity
7 as these meetings move around the country to hear from partners
8 that USDA has been investing in, engaging with to grow the
9 organic industry. And so I think it's wonderful that we have
10 our top partners here. It's also great to have NRCS and other
11 really critical USDA equities that are built around and
12 supporting organic production.

13 But I just want to take a moment to talk about TOPP
14 because this is something that is very near and dear to me,
15 something that we launched as part of the Organic Transition
16 Initiative when the Organic Transition Initiative was launched
17 a few years ago.

18 The TOPP program, the Transition to Organic
19 Partnership Program, and I'm probably speaking to like 50
20 percent of the crowd who is probably one of our top partners,
21 so you know this very well, is really about building and
22 strengthening America's producers of organic, creating an
23 organic network and building and growing producers around the
24 country who are certified organic.

25 This is about connecting transitioning farmers with

1 mentors. This is about providing community building. It's
2 about providing direct on-farm technical assistance, whether
3 that's technical assistance with organic farming practices,
4 developing the organic plan, doing the certification process,
5 all of the different components that are involved in becoming
6 certified organic. It's about workforce development and it's
7 about helping producers over time overcome some of the
8 challenges and improving market access and market opportunity
9 and following up on certifications. So we're really excited.

10 I am very passionate about the TOPP program and we're
11 really excited about just the work that's been done so far and
12 the accomplishments that have been done so far. So far, in the
13 last two years since the TOPP program has launched, there's
14 been -- partners have had 849 events, more than 1,500 people,
15 actually close to 1,600 people have received direct technical
16 assistance. There are close to 700 mentoring pairs around the
17 country and more are being actively matched each and every day.

18 So what this has meant so far in the past two years,
19 60,000 -- over 60,000 acres of farmland in the United States is
20 now in the process of becoming transitioning into organic
21 production as a result of the TOPP program. And yes, that's
22 huge. And we're just getting started.

23 I mean, as all programs happen, right, you start slow
24 and then you build and you build and you grow momentum and
25 energy. And in addition to the 60,000 that are in transition,

1 over 18,000 are already certified. 18,000 acres are already
2 certified as a result of the TOPP program. This is really,
3 really a very exciting thing.

4 So this is, again, really an important aspect, an
5 important part of the work that we're doing at USDA, building
6 more, new, and better markets for producers, building and
7 bringing more of the food dollar and the fiber dollar and the
8 feed dollar back to family farmers, back to producers. It's
9 the work that we're doing on what we call our food system
10 transformation, really transforming the food system so that
11 more of the food dollar, more of the opportunity happens at the
12 farm, that farmers, producers, small and mid-sized processors
13 see opportunity to really be able to leverage themselves in a
14 whole new way.

15 We're also doing that through the Organic Market
16 Development Grant Program. We announced the funding for this
17 program a few years ago. We've received an overwhelming number
18 of applications and we're excited to be able to fund \$85
19 million -- \$85 million to the Organic Market Development
20 Program to really not just to support those transitioning
21 producers and to support the existing organic producers to be
22 able to tap new market opportunities and processing capacity
23 and distribution capacity that really make or break whether or
24 not someone can stay in organic production.

25 So we're excited about all of these different

1 components together. One thing I will say is the Organic
2 Market Development Program, and like all of our programs, like
3 TOPP as well, is a very purposeful focus on small and mid-sized
4 businesses, underserved businesses, veteran farmers, folks that
5 USDA has not been working with as much in the past. And so I'm
6 excited that the Organic Market Development Grant Program, of
7 the 107 projects that have been funded, 68 percent -- 68
8 percent, over two-thirds of the awardees are small businesses.
9 So I think that really just shows how important it is that we
10 are not just investing, but what the economic driver that will
11 be for all of the communities in which those businesses are
12 serving.

13 Also, we know that transparency and price
14 transparency and things like market news are really important
15 for producers, for processors, for folks in the organic sector
16 to be able to make informed decisions. So we were excited
17 yesterday to announce that we've added more organic products to
18 USDA Market News. Organic milk, cattle, grains, feedstock, and
19 fertilizers are now added to the list of published reports that
20 are happening through USDA Market News. This is really about
21 making sure that everyone in every sector can make informed
22 decisions about their businesses.

23 So I'm going to wrap up. I'm really excited to be
24 here. I'm always excited to be at the National Organic
25 Standards Board Meeting because it is really a place where the

1 community comes together, a community of experts, a community
2 of folks who are passionate about the industry, passionate
3 about growing the industry, passionate about continuous
4 improvement, which is such a core tenet of the National Organic
5 Standards.

6 So it's wonderful to be here. This is truly
7 democracy in action happening right here. And I couldn't be
8 more proud and more excited that it is happening in a sector
9 that I, of course, care so much and passionate about. Probably
10 most of you know, but I came from the organic industry. My dad
11 converted to organic in the 1980s and worked with my dad,
12 alongside my dad, at our organic farm for a while. And so the
13 organic industry and the organic sector is something that is
14 very important to me. And I know many of you, and I've known
15 many of you since I was young, so it's, to me, also just a
16 personal pleasure and an opportunity to be able to get here, to
17 be able to meet with you and talk with you, hear from you, and
18 just reminisce also about the great work that's behind us, and
19 then also the great opportunity that is ahead of us.

20 So I'll pass it back to you, Dr. Tucker. I just want
21 to, again, thank the National Organic Program and, Dr. Tucker,
22 your team, and thanks to your leadership for all that you've
23 done. And I want to thank the National Organic Standards Board
24 for your time, your leadership, your volunteerism for serving,
25 and then, of course, everyone who is here to engage and provide

1 dialogue as well. So thank you so much.

2 DR. TUCKER: All right. Thank you very, very, very
3 much for being here and for all your great comments. Again, we
4 appreciate your leadership.

5 You know, first meeting we ever had with the under
6 secretary, I thought, whoa, she only knows what the national
7 list is. We don't have to start with, you know, first the
8 dinosaurs walked and then the seas parted. And, you know, it's
9 actually saved a whole lot of time. You know, when we're
10 having really difficult policy conversations, she has the back
11 story, and that's been enormously helpful. So, again, happy to
12 have you here.

13 Okay. Now I am pleased to introduce Director Lisa
14 Charpilloz Hanson, who brings more than two decades of
15 leadership, policy direction, and program administration to the
16 role of Director at the Oregon Department of Agriculture. Her
17 passion for agriculture stems from living and working on her
18 family farm, leading her to study agriculture and resource
19 economics.

20 Prior to her appointment in her current role, the
21 Director led the Oregon Watershed Enhancement Board, served as
22 Deputy Director and Commodity Commission Program Manager at the
23 Oregon Department of Agriculture, and worked for several years
24 in the food processing industry.

25 Her commitment to service and leadership in

1 agriculture has been recognized both locally and nationally.
2 Director Charpilloz Hanson is a graduate of Oregon State
3 University and lives on a farm in rural, I'm going to get this
4 wrong, Clackamas? Whoa. Clackamas County, where she raised
5 award-winning Hampshire and Southdown sheep. So thank you so
6 much for being here, Director.

7 MS. CHARPILLOZ HANSON: Well, thank you for the nice
8 introduction. And welcome, all of you, to Oregon. We're
9 excited to have you here. I understand it's been 11 years
10 since you were in Oregon.

11 I hope while you're here you have the opportunity to
12 enjoy some of our delicious Northwest cuisine. And for those
13 of you who are joining online, I hope you have a chance to
14 visit our beautiful state soon.

15 As you heard, agriculture is really personal to me.
16 I grew up in rural Oregon, and I chose to raise my family on a
17 small farm. There's nothing like having your hands in the soil
18 and living the seasons of agriculture to ground you in life.
19 I've devoted my career to the hard-working farm families in
20 this state, and it has made it incredibly special to me.

21 Over the years, Oregon agriculture has evolved,
22 evolved to better balance our needs of our communities, our
23 environment, and our economy. The organic sector has been at
24 the forefront of this change over time.

25 Like agriculture in this state, at ODA, we are

1 transforming ourselves as an agency to support the next
2 generation of farmers and ranchers, and preparing them to face
3 both the challenges and the opportunities ahead.

4 At the heart of Oregon agriculture, and its success,
5 is resilience. Our producers' ability to adapt to changing
6 climates, protect our soils, and enhance the sustainability of
7 our food supply. In Oregon, innovation is the key to that
8 resilience, especially through organic farming practices. Our
9 diverse landscapes require constant adaptation. Our organic
10 farmers are leaders in pioneering solutions like cover
11 cropping, composting, and crop rotation. These practices not
12 only improve our soils and promote biodiversity, but serve as a
13 model for all farming, organic and conventional alike.

14 Collaboration across production types is absolutely
15 essential to the success of agriculture. We are all united by
16 our shared goals for the prosperity of our communities, our
17 economies, and to be good stewards of the land.

18 Recent climate events remind us of how interconnected
19 we are and how fragile our systems can be. The need for
20 collaboration and resilience across all farming systems is
21 absolutely critical. As farmers, ranchers, and stewards of the
22 land, we are not just cultivating crops or raising livestock,
23 we are cultivating the future. Every decision we make impacts
24 generations to come, and that's a responsibility that we all
25 share.

1 I believe all farmers are united in protecting our
2 most vital resources: our soil, our water, and our land. By
3 embracing innovation and practices and collaborating, we can
4 protect these resources for future generations.

5 Over the next three days, the discussions you will
6 have around carbon dioxide, compost production, and crop
7 insurance are critical to enhancing the resilience of
8 agriculture. These are areas where collaboration can drive real
9 change.

10 Oregon shares your commitment to building a more
11 resilient future. Your research priorities, encouraging
12 innovation and resilience, are critical to ensuring agriculture
13 thrives in the face of environmental changes. Resilience isn't
14 just about survival. It's about thriving in uncertainty. Your
15 leadership in organic farming and the spirit of innovation
16 helps lay that path forward.

17 In Oregon, we pride ourselves on our diversity, our
18 innovation, and our resilience. It's through these strengths
19 that we build a prosperous future for agriculture. The work
20 you're doing here, the work that will continue beyond this
21 meeting, supports organic producers and advances our shared
22 goals. Together, we are shaping a future that isn't just
23 sustainable, but thriving.

24 It's with that commitment that the future and for the
25 next generation of agricultural producers, I'm thrilled to be

1 here today and welcome you to Oregon. Thank you for coming to
2 Oregon and enjoying our meeting.

3 DR. TUCKER: Thank you so much, Director, for being
4 here and for your great comments. We're really, really
5 grateful to have you, so thank you.

6 Okay. I am now both figuratively and literally going
7 to transition the mic over to Kyla Smith so that she can
8 facilitate a Q&A session between the under secretary and the
9 Board.

10 So, Kyla, turning it to you.

11 CHAIR SMITH: Good morning, everybody. Thanks for
12 joining us today. And thanks so much, Under Secretary and
13 Director, for being with us. It's such an honor.

14 I think we have time for just a few questions from
15 the Board. So if anybody had questions. Okay. Right in a
16 line here. Look at that.

17 Okay, let's start with Allison.

18 BD. MEM. JOHNSON: Thank you so much for being here,
19 Under Secretary, and for your leadership on organic.

20 As you know, I've been following the Organic
21 Transition Initiative very closely and it's been so wonderful
22 to hear from our top partners at our last few meetings. And
23 I'm blown away by the statistics you just shared on the success
24 of the program so far.

25 Can you speak to what USDA is doing to continue the

1 progress that's been made and build on this program?

2 MS. CHARPILLOZ HANSON: Yeah, Allison, well, thank
3 you. And yeah, isn't it remarkable? I mean, and that is the
4 work of the top partners. That is the work of probably many of
5 you in the audience and then folks around the country that have
6 been making that happen. And I think that is the critical
7 piece of continuing this work, right, is investing in those who
8 are invested in organic. And that is what the TOPP program is
9 doing and that's what the Organic Market Development Grant
10 Program is doing.

11 And so as far as what next, this program runs for a
12 few more years. Three more years? Yeah. By design, we wanted
13 it to be a longer-term program. It's a three-year transition
14 to organic and we know that once folks transition to organic,
15 additional support is needed to, you know, continue that. And
16 so this program runs a few more years and then from there we'll
17 see what next.

18 There is an absolute commitment from the secretary
19 all throughout the department to continue to invest in organic
20 production, to grow organic production. I think the \$300
21 million Organic Transition Initiative, our largest investment
22 ever, is a good example of that. But then also just what next
23 as far as the next level of funding is, as I think something
24 that will just be, you know, part of the discussion going
25 forward.

1 But the investment in folks and the investment in the
2 organizations, the mentors, the people who are making these
3 numbers possible, making this transition possible, will
4 continue.

5 BD. MEM. JOHNSON: Thank you. I appreciate it.

6 CHAIR SMITH: Amy?

7 VICE CHAIR BRUCH: Thanks, Kyla. Okay. Third time's
8 the charm.

9 All right. I wanted to say thank you, Under
10 Secretary, for joining us here today and also to the Director
11 of Agriculture in Oregon. Thank you so much. That means a
12 lot.

13 My question is for you, Under Secretary Moffitt.
14 Many of us would like to see the Organic Policy Advisor role
15 filled to improve better coordination between the USDA on our
16 organic issues. Can you speak to the importance of this role,
17 please?

18 UNDER SECRETARY MOFFITT: Yeah. This role is
19 critically important to USDA, to the Department, and to the
20 industry as a whole. I, too, would like to see the Organic
21 Policy Advisor filled. And so we continue to work on, and as
22 I've said, you know, we welcome folks to reach out to us if
23 they're interested.

24 I think, you know, for us the biggest thing is what
25 does that role look like? And I welcome the feedback from the

1 sector, too, of what that role looks like as far as, you know,
2 certainly we've had a variety of different roles: political,
3 career, and what makes the most sense. But I think we are
4 really eager to move forward with an organic policy advisor.

5 I say this personally because I've been kind of like
6 filling that role for the time period. Dr. Tucker knows this
7 well. We meet now just every other week. But while we were
8 implementing SOE and other really critical roles, we were
9 meeting weekly. And so -- and while I love that, I also know
10 that, you know, we really do need a person in that role to
11 really make it even better than, you know, what I can do in the
12 time that I've been able to give.

13 VICE CHAIR BRUCH: Thank you.

14 CHAIR SMITH: Nate?

15 SECRETARY LEWIS: Thanks for all your comments. My
16 question is related to the USDA Equity Commission. And I was
17 wondering if you could tell about the progress of that
18 commission and its ongoing work on equity action playing across
19 USDA, including AMS.

20 UNDER SECRETARY MOFFITT: Yeah, absolutely.

21 So for those who haven't been following the work of
22 the USDA Equity Commission, this was a commission that was
23 launched a few years ago by the department, really to take a
24 hard look at the work across the department that we're doing
25 and how it touches or doesn't provide equitable access to the

1 department and to our programs.

2 And so the Commission has been meeting over the
3 course of the past few years and presented to the secretary
4 this spring a set of recommendations. And this is an outside
5 commission. These are outside stakeholders that brought these
6 recommendations to us. It is not us looking in, although we do
7 that too, and that's really important. And so the
8 recommendations, there are many. And then what the Commission
9 has been doing since then is having different Commission
10 meetings around the country, kind of like what NOSB does, to
11 really engage with the Commission members in their region.

12 I was able to join the one in Texas and then also the
13 one in California just a few months ago, a couple months ago,
14 to hear about the work and the need. That is everything from
15 recommendations as, I will say, as specific, definitely not as
16 small, but as specific as making sure that our programs come
17 out in languages that are in the languages of more producers
18 than just primarily English-speaking languages to also just
19 taking a hard look at our programs and the barriers for access
20 to our programs.

21 I'd say within EMS, TOPP is a great example of that.
22 How many of -- I mean, I think all of us know of producers who
23 are farming organic who haven't been able to convert to
24 organic, perhaps because they're too small, perhaps because
25 they haven't had the resources. And the TOPP program is now

1 making that possible. It's now providing resources and
2 technical assistance and organic advisors and mentors for
3 producers who have always wanted to become certified and just
4 haven't had the resources to do that.

5 So I think TOPP is actually a really great example of
6 where we have really invested money and the community power to
7 really start to address, I think, one of the biggest gaps in
8 organic, which is small, predominantly non-English-speaking
9 farmers who wanted to become organic who haven't been able to.
10 So I think that's a really great example.

11 We've also launched -- we have over 60 programs, 6-0
12 programs at the department that touch on the food system, that
13 provide funding for producers. I think the one that most folks
14 are most familiar with is the value-added producer grant. But
15 we have a lot -- we have 59 other ones, and we've added new
16 ones as well with the American Rescue Plan that allowed us to
17 invest more in local and regional food systems, including
18 organic production.

19 But that comes with its own challenges to even know
20 about these programs, and so that's where we've also invested
21 in regional food business centers, and that's, I think, also an
22 important part. So the food business centers do a few
23 different things. The food business centers are navigators for
24 producers to be able to know what programs are out there and
25 help producers know which programs are the right programs and

1 available for them to be able to tap, whether it's loan funding
2 at the department, whether it's grant funding at the
3 department, whether it's simply technical assistance,
4 developing a food safety plan or an organic system plan, all of
5 those different programs. So they serve as navigators.

6 They also have funding themselves. They have
7 business builder funding that they will be launching soon. So
8 the business center in this region is the Rocky Mountain
9 Northwest Regional Food Business Center, so that covers
10 Colorado up into the Rocky Mountains and then over here into
11 Oregon and Washington, and they'll be announcing their funding
12 for business builders as their grant dollars for folks to be
13 able to apply for different projects as well. So those are a
14 few ways in which, within AMS, we're really touching on more
15 equitable access to our programs, making sure that those who
16 have not always seen USDA as a partner or a resource are able
17 to do that, and we're doing that not just directly as a
18 touchpoint from USDA, but investing in organizations that are
19 trusted by farmers.

20 So the 160 TOPP partners, or I think there's even
21 more now, but those TOPP partners are all different
22 organizations that are trusted by different farmers. Who my
23 dad goes to for resources is different than who, you know, you
24 go to, Nate, for resources, and so I think that is also really
25 important as well is that we're investing in trusted local

1 organizations that are by producers as well to make sure that
2 they know of and feel comfortable seeking access.

3 CHAIR SMITH: The last question is for me. I get to
4 do that as the chair, so obviously working for a certifier, the
5 organic cost share program is very near and dear to our hearts
6 and those that we serve, so since the farm bill has expired,
7 how is USDA preparing to deal with the potential gap in funding
8 for the organic cost share program?

9 UNDER SECRETARY MOFFITT: Yeah, such an important
10 question, and I mean, I'll say across the board on farm bill as
11 a whole, specifically also for the cost share program, is we
12 continue to work with and engage with Congress in providing
13 technical assistance so that they know what programs are at
14 risk at what point the longer that there is a delay in
15 implementation of the farm bill.

16 CHAIR SMITH: Thank you, and thank you both so much
17 for being here. I really appreciate your time with us today.

18 DR. TUCKER: Okay, folks, we are going to transition
19 now. Let's give a final thanks to our speakers this morning.
20 They're going to exit stage right. Thank you so much for being
21 here.

22 Okay, we're going to now transition into
23 introductions, but before we do that, just logistically, it's
24 really hard to see half the table with this. Can we lift this
25 down?

1 Okay, now we can all see each other, so great. And
2 then I'm also going to invite my colleague, Jared, to come up
3 whenever you would like. Jared's my phone-a-friend. It's
4 always nice to have the phone-a-friend person at the table with
5 you.

6 Okay, everyone settled in? Okay.

7 All right. We are now going to continue with our
8 program here, and so we're going to start with just my
9 introduction of the National Organic Program Team, as we have
10 several folks here, some are in the room, others are in other
11 meetings, so TOPP meetings are happening, so some of the folks
12 are in TOPP meetings, and I'm not entirely sure who's where, so
13 just when you see an OP folks, please say hello to them.

14 First, I'd like to acknowledge and have us all thank
15 Michelle Arsenault, our Advisory Board Specialist. So this is
16 Michelle's now 25th meeting, so her silver meeting, supporting
17 the National Organic Standards Board and the organic community.
18 So, Michelle, congratulations and thank you.

19 We also have a number of other team members from the
20 Standards Division, Jared Clark, my phone-a-friend here. Jared
21 just got a promotion, so he is now our new Official Assistant
22 Director in Standards Division, so congratulations, Jared.

23 Also in the Standards Division, we have Andrea Holm,
24 running the technology over there. Andrea, thank you.

25 We have Jo Mirenda, who's actually right in the front

1 row. Go ahead and wave. And Devon Pattillo -- is Devon here?
2 I haven't seen Devon yet, but Devon is on his way, if he's not
3 here already, with the Standards Division. They are all
4 Agricultural Marketing Specialists.

5 We also have Heather Kumar, who's a Food
6 Technologist, supporting the technical assistance needs of the
7 Board. That came from a Board recommendation. Heather's right
8 in the front row there.

9 And Standards Director Erin Healy is online with us
10 today. Also in Portland, we have Penny Zuck, Alexis McInerney,
11 and Rebecca Claypool, all of whom are with the Office of the
12 Deputy Administrator, and Renee Gebault King, who's an
13 International Specialist. They're all playing critical roles
14 in managing the TOPP program, working directly with regions and
15 our national-level cooperating groups. So they're here to
16 support those meetings today.

17 We really are doing two simultaneous meetings here,
18 the NOSB and TOPP partners coming together. So it's an honor
19 to work with all of these folks.

20 We also have three local team members here to
21 observe, learn, and connect. We have Sam Schaefer-Joel and Ali
22 Hudson from Accreditation, and Darin Jones from Compliance and
23 Enforcement. So thank you for being here.

24 Okay. Next, I am going to turn the mic over to Kyla
25 Smith, our Board chair. Kyla will be introducing Board

1 members, all of whom devote hours and hours of volunteer time
2 to serve the organic community. Let's give the full Board a
3 big round of thanks and appreciation.

4 And Kyla, as I turn the mic to you, let us just pause
5 and look up, because having a meeting with a moonroof is just
6 really cool. You know, you've got to just say it. So Kyla,
7 thank you so much, and take it away.

8 CHAIR SMITH: Yeah, the ambience is lovely.

9 Okay, so we're going to do introductions for Board
10 members. We'll go around the table. But first, everyone, just
11 welcome again. I know we've said it many times, but welcome to
12 everybody in the room and also that is coming to us on Zoom.

13 One of our own, Logan, is joining us via Zoom this
14 meeting. So we will go around the room and have Board members
15 introduce themselves, name, seat, NOSB committee chair, if you
16 are in that, and where you're from.

17 And, Franklin, we'll start with you, and then we'll
18 just go around like this, and we'll hit Logan, you know, as we
19 get to the center here.

20 BD. MEM. QUARCOO: My name is Franklin Quarcoo,
21 Environmental Protection and Resource Conservation seat, and
22 I'm the subcommittee chair for the Materials subcommittee.
23 Thank you.

24 BD. MEM. JEFFERY: Mindee Jeffery. I sit in the
25 Retailer seat, and I am not a subcommittee chair.

1 BD. MEM. POWELL-PALM: Nate Powell-Palm. I sit in
2 the Farmer seat, and I've gotten to be Chair Emeritus this
3 year, which has been lovely.

4 BD. MEM. HUSEMAN: Good morning. My name is Kimberly
5 Huseman. I sit in a Handlers chair, and as a super senior, I
6 also do not have a subcommittee chair spot.

7 BD. MEM. TURNER: And that makes another one of us
8 not in a chair seat. I'm Wood Turner. I'm in a Resource
9 Conservation seat, here from the Bay Area.

10 CHAIR SMITH: Logan, it's your turn.

11 BD. MEM. PETREY: Can you hear me now?

12 CHAIR SMITH: Yes. Quite loudly.

13 BD. MEM. PETREY: Well, good. I'm glad I get
14 acknowledged that all of those super seniors were chairs for
15 many years, so I don't want people to think they didn't work
16 hard. But no, I'm Logan Petrey. I am the chair of the Crop
17 subcommittee, and I'm in the Farmer seat. Thank you.

18 BD. MEM. D'AMORE: Well, you folks didn't take much
19 time to do it, so I'll go a little longer, if I may. You know
20 you're old when you have to write down your own resume to read
21 it. So anyway, Jerry D'Amore, Monterey County, California,
22 fifth year in the Handlers seat. And I've literally practiced
23 the business of agriculture for over 50 years, and that was
24 split between production and go to market.

25 I'm going to read this one because it's important to

1 me today, and it may be important to me for some of the
2 proceedings later on. I owned and operated my own production
3 company for nearly 20 years. Almost all of that was hydroponic
4 production inside greenhouses.

5 With that said, I have grown hydroponic tomatoes
6 outdoors, and I have grown soil-based crops inside greenhouses.
7 I'm making a distinction here between greenhouses and
8 production systems. Nearly 20 years of my time working in
9 agriculture I spent living overseas with my family, and it's
10 been a great honor to be here with all of you for nearly five
11 years now.

12 BD. MEM. DIMITRI: Hi, I'm Carolyn Dimitri. I sit in
13 a consumer seat, and I do not chair any committees either.

14 BD. MEM. NANDWANI: Good morning. My name is Dilip
15 Nandwani. I'm based in Nashville, Tennessee, but for Tennessee
16 State University. I'm on an environmental conservation seat
17 and a member of the Mid-West Top Program.

18 In Tennessee, being land-grant universities, a
19 faculty full professor, my program is in organic agriculture,
20 like research, teaching, and extension. Glad to be here. Not
21 a member -- not a chair, but I do a member of Materials and
22 Handling subcommittee. Thank you.

23 BD. MEM. CALDWELL: Morning. I'm Brandon Caldwell.
24 I sit in a consumer and public interest seat, and I'm chair of
25 the Livestock subcommittee.

1 Can't resist saying a few words about TOPP. I have
2 the pleasure of being a mentor to a young farmer in upstate New
3 York, and I'm sure that actually he has taught me a lot more
4 than I have taught him, but when I see these young farmers with
5 the vision and energy that they have, it gives me a lot of
6 confidence for the future, so really appreciative of that
7 program.

8 BD. MEM. JOHNSON: Good morning. I'm Allison
9 Johnson. I sit in the consumer public interest seat, and I
10 chair the Handling subcommittee.

11 SECRETARY LEWIS: Hi, folks. Nate Lewis. I sit in
12 the resource conservation seat through my work protecting
13 farmland with the Washington Farmland Trust. I'm also an
14 organic producer in Olympia, Washington. I'd like to welcome
15 you all to the Maritime Northwest and Salmon Nation.

16 VICE CHAIR BRUCH: Good morning. My name is Amy
17 Bruch. I'm a sixth-generation farmer. I'm so thrilled to be
18 here today with all of you. I currently serve in the farmer
19 seat. I also serve as the chair for the Compliance,
20 Accreditation, and Certification subcommittee, and I also serve
21 as Kyla and the Board's vice chair. Thank you.

22 CHAIR SMITH: And my name is Kyla Smith. I am in the
23 certifier seat. In my day job, I work as the certification
24 policy advisor at PCO, which is the USDA-accredited
25 certification agency. I worked in certification for over 20

1 years. It's, like, so wild. And I am obviously the chair, so
2 I'm, like, your MC for the next couple days. And home for me
3 is State College, Pennsylvania.

4 And that rounds out roll call. I'll just note that
5 Javier Zamora is absent. And I'm going to turn it over to Nate
6 Lewis to give us the secretary's report.

7 SECRETARY LEWIS: The minutes were provided to the
8 members ahead of the meeting for review. I'm curious and would
9 like to ask anyone if there are any corrections to the minutes.
10 Not seeing any. The minutes are approved as written, and I'll
11 turn it back over to the chair, Kyla. Thank you.

12 CHAIR SMITH: Thanks, Nate. Okay, I'm going to say a
13 few words, and then I'll hand it over to Amy, who also has a
14 few remarks. And then we'll take a break, and then we'll hear
15 from Dr. Tucker.

16 So again, it's so lovely to see everybody's faces in
17 person. Again, we're bummed that Logan is unable to join us,
18 but really grateful that she's able to be here with us
19 remotely. Her community was hit pretty hard by Hurricane
20 Helene, and she needed to stay put to recover and rebuild after
21 the storm. So again, so grateful for the NOP team that were
22 able to accommodate that pivot. And we've done that before for
23 other instances when Board members have needed to join us for
24 that remote participation. And we sort of do that without
25 missing a step these days, and that's really, really awesome.

1 So again, thanks to the NOP team for shifting around the tech
2 to make that possible in order for us to be able to support our
3 friend and team member to do what she needed to do at home.

4 As I mentioned on the webinars last week, support and
5 connection are keys to helping those in our community through
6 these challenges of natural disasters that are being thrown
7 their way. And as I also mentioned last week, so, again, sorry
8 for the repeat, but some things are worth repeating, within the
9 organic regulations, there is a mechanism to temporarily
10 deviate from certain regulations that may have been impacted
11 due to a natural disaster. Those allowances are outlined in
12 the regulations at 205.290, the temporary variance section.
13 There is also an instruction in the program handbook. It's
14 2606.

15 So certified operations must engage in this temporary
16 variance process in consultation with their certifier, and
17 ultimate approval is given by the NOP. Not all regulations are
18 allowed to be deviated from, so definitely check out the
19 regulatory text and connect with your certifier, but this could
20 definitely be a resource to aid those in impacted areas. So,
21 again, I wanted to reiterate it today.

22 Logan, we are continuing to send good thoughts your
23 way, and we look forward to seeing you in the spring in Tempe.

24 Okay, switching gears a bit, I wanted to acknowledge
25 all the hard work of this Board, particularly this last

1 semester. This agenda is jam-packed, as I'm sure you have all
2 recognized, with the output of the amazing persons around this
3 table. I know when I was contemplating Board service, five
4 years seemed like a really long time, but in reality, it's not
5 that long, and it goes really fast. I can't believe I'm, like,
6 going into my last year. Again, that's wild.

7 So there really are only ten meetings, ten
8 opportunities to recommend something to the NOP. This Board
9 has looked at ways to streamline our processes to make them
10 more efficient, but not so that we have just more time and can
11 do less work, but actually so that we can prioritize and take
12 on additional items, from nationalist cleanup items to
13 additional topics that have the potential for some real impact.

14 We are grateful to have additional staff resources
15 from the NOP. Again, shout out to Heather. She's awesome.
16 This has been such a huge help. Has this all gone perfectly?
17 Nope. Do we have some adjustments to make? Sure do. Is this
18 okay because we are human? Absolutely.

19 So as we move into the next year, I think it's
20 important to remember a few things, and I'm also sort of saying
21 this as a reminder to myself, because, again, the tendency is
22 for this group to want to do more to better serve you all. So
23 a couple things, reminders.

24 Number one, as my table mate likes to remind us, we
25 need to go slow to go fast. We will be onboarding five new

1 Board members in hopefully January, and we really need to get
2 them on solid footing quickly because then there will be an
3 additional five new members right on their heels.

4 Number two, we often hear comments from stakeholders
5 about there not being enough time to get through all of the
6 agenda items and make comments, and unfortunately, no one on
7 this Board's superpower is to add more days or weeks to the
8 year. And so if we allow more time for public comment, it's
9 ultimately less time for the Board to do our work, which isn't
10 workable. So maybe we just need to be mindful of the number of
11 topics and try to find that sweet spot to continue to make
12 forward progress without maxing out board members or our
13 stakeholders. I'm not sure what that is. It's hard because we
14 all care so much, and we aim really high.

15 Number three, there were definitely a few things this
16 round where there were some mistakes that were made. Again, we
17 are all human, so that's okay, and it happens. And I just want
18 to acknowledge that if we would have slowed down a little bit,
19 that perhaps could have been avoided. And in hindsight, I wish
20 I would have managed that a little bit better. So perhaps in
21 the coming Board leadership, along with subcommittee chairs, we
22 can find that sweet spot so that we can avoid some of those
23 mistakes and make things workable for us and our stakeholders.

24 Okay, a couple other -- thanks, Jerry. Thanks,
25 Jerry. You guys make it easy.

1 Sorry. A couple other streamlinings that I'd like to
2 touch on. So number one, annotation changes. We have a couple
3 of annotation changes on this agenda using our new process. As
4 with any new process, there are bound to be some bumps as we
5 learn what the heck we're doing up here. So toward the end of
6 the semester, we did realize that we didn't do a very good job
7 of making this very transparent in the subcommittee notes and
8 on the work agenda tables, that there would be two annotation
9 change proposals on the fall meeting agenda, and we had
10 discussed improvements that could be made to the process to
11 remedy those things.

12 So while the ideas of these annotation changes were
13 floated around and discussed a little bit during the spring
14 meeting, we, again, could have done a better job in documenting
15 next steps throughout this summer. This was also recognized by
16 some commenters. And again, thanks for the feedback on how to
17 do better to document those in the subcommittee notes around
18 what our intentions are. Great minds think alike.

19 At this meeting, we will also be voting on 2026
20 sunset materials. As you all know, this is the second meeting
21 for these materials. All of these materials have had a
22 thorough review. They were discussed leading up to the spring
23 meeting in subcommittee, during the spring meeting by the full
24 Board, taking into consideration the comments submitted by you
25 all in the audience, and then again during the subcommittee

1 meetings throughout the summer.

2 When we get to that portion in our agenda in the
3 three scope subcommittees: crops, livestock, and handling, you
4 may notice that some materials won't -- there won't be a lot of
5 discussion. This is intentional so that we can stay on track
6 and have more time to fully address agenda topics that we know
7 will take a little bit longer. We are taking a risk-based
8 approach. See what I did there?

9 I just want you to rest assured that the materials
10 that had less discussion were fully vetted and reviewed
11 according to our process, including considering the comments
12 provided by you all. You all play a pivotal role in our
13 process.

14 Speaking of comments, this round the Board received
15 4,258 total comments, and about 4,100 of those were from form
16 letters from three letter writing campaigns. And I wanted to
17 make you all aware of an option for submitting those letter
18 writing campaign comments in a different way. This was new to
19 me, so I don't know, maybe you guys know this, but maybe not.
20 This other way to submit these group comments would streamline
21 the process better. It would save time for NOP staff and Board
22 members in the administrative tasks of posting all those
23 individual comments in regulations.gov, bundling them for Board
24 members, and then Board members reading through the same
25 comment 4,100 times.

1 So this, I believe, is a new-ish feature. So again,
2 I just wanted to highlight it. In regulations.gov, you have
3 the option for selecting that you are submitting a comment for
4 the group, and I believe this is described on the NOSB page for
5 how to submit comments. So I'm not going to go into great
6 detail, but you can submit that you are submitting a comment
7 for the group, attach the letter or the comment, and then enter
8 in the number of persons this is representing.

9 So if you're, like, doing it through a petition or
10 something like that, you can enter in 4,100 people agree with
11 this comment, and that number tallies in the same way. So it's
12 not, like, not counting those as individual comments. It's
13 just saving some administrative time. So just check that out
14 if that would work for you all.

15 And, again, we'll be highlighting our outgoing Board
16 members quite often this meeting, but just wanted to, again,
17 give a shout-out to Mindee and Nate and Kim and Wood and Jerry
18 as this marks their last meeting. It's been such an honor to
19 have gotten to work with you all. I know you all personally.
20 Your dedication to the industry is unmatched. We will honor
21 you properly on Thursday, but, again, I just wanted to take a
22 quick moment to recognize your contributions.

23 So can we give another round of applause to these
24 awesome folks?

25 And I'm going to hand the mic over to Amy.

1 VICE CHAIR BRUCH: Thank you, Kyla. And I apologize.
2 My microphone actually says no light, so I might have trouble
3 with this for the next couple days of not turning it on right.
4 So bear with me here.

5 Dear esteemed Board members, Dr. Tucker, NOP staff,
6 the organic community, and all others. As a farmer, I see
7 agriculture not only as a career, but a life that provides
8 profound meaning.

9 When I began my transition to the organic, I
10 immediately felt a sense of belonging, as if I had been
11 welcomed into a community, as Under Secretary Moffitt had
12 mentioned, or, as I like to say, a family. So thank you all.
13 I would like to touch on two brief points regarding family.

14 First off, can somebody on the Board tell me one of
15 the earned nicknames for the city that we're in, Portland?

16 CHAIR SMITH: I know because you told me.

17 VICE CHAIR BRUCH: Go ahead, Kyla.

18 CHAIR SMITH: Bridge City.

19 VICE CHAIR BRUCH: Bridge City, yes, or Bridgetown.
20 I thought reflecting on this during our NOSB meeting was very
21 fitting. We need to continue to build bridges with our diverse
22 organic family. We need to make sure to elevate all voices
23 from the stakeholder community, as each perspective is valuable
24 and integral. It's also important to build bridges with new
25 partners within the ag community when we review issues that

1 impact organic regulations, standards, policy, and marketing.

2 Secondarily, I'm thankful for the support over the
3 years I've been able to serve on the NOSB and assume leadership
4 positions, and most importantly, grow my family's organic
5 operation and also be blessed with two incredible boys. And
6 when we talk about how fast our service goes on the Board, I
7 have a visual reminder, and I'll have Andrea pull that up.

8 One of them is turning three on Friday, so thankfully
9 I'll be able to see him on his birthday, and the other is six
10 months. So a lot has happened while I've been on the Board.

11 We're building bridges in my family also. One child
12 wants to grow food, while the other one wants to eat organic
13 food. So that's a picture of them on the board there.

14 In closing, I'm excited to further strengthen these
15 bridges within our organic family and continue to work together
16 towards our shared goals, upholding the integrity of the seal
17 on the farm, for the consumer, and everywhere in between.

18 Thank you.

19 CHAIR SMITH: We're running quite a bit early, so I
20 don't know if we want to take a break or if you want to keep
21 rolling in. Let me see here.

22 Yeah, let's take a quick break, because I could use
23 some coffee. So let's come back in 15 minutes.

24 (Recessed at 9:30 a.m.; to reconvene at 9:48 a.m.)

25 CHAIR SMITH: If everybody could please take their

1 seats so we can get started. Okay, everybody, sit down. Time
2 to start. We're ahead of schedule. I'd like to keep it that
3 way, because, you know, public comments always take longer. So
4 let's stay ahead, if we can. Thanks.

5 Okay, a couple reminders. First of all, again, just
6 want to give a thank you to Cafe Ma'am for providing the coffee
7 that's in the back of the room, super tasty. We also, the wi-
8 fi information, in case you guys need that. I don't think it
9 was anywhere on the tables or anything. But the network is
10 Hilton Meeting Room, and the password is NOSB24, in case
11 anybody was looking for that.

12 And then also, there is going to be a reception. So
13 another reason to stay on track for today so we can be timely
14 to the reception. So this is being presented by the Oregon
15 Organic Coalition. It's at 6:30, and it's at the Midtown,
16 which is not too far from here. And that's being presented by
17 the Oregon Organic Coalition with several sponsors. So hope to
18 see you all there to celebrate all of us in the community.

19 And I'm going to now turn it over to Dr. Tucker to
20 present the NOP update.

21 DR. TUCKER: All right, thank you. Thank you, Kyla.
22 Thank you, everybody, for coming back.

23 We are now going to do the NOP update for the
24 National Organic Standards Board, and this is Part 2. So if
25 you aren't familiar with Part 1, I'll talk about that in a

1 second.

2 But first, I would like to welcome and celebrate our
3 certified organic businesses in Oregon. There are 869
4 certified crops, livestock, and handling operations in Oregon,
5 wild crops, too, I think. So let us -- can we have all the
6 farmers in the room please stand up so we can acknowledge you?
7 Farmers in the room. Go ahead and stand up.

8 Thank you, and welcome to all our certified
9 operations. Okay, next. So this is a plug for Part 1. So,
10 again, this is Part 2 of the NOP update. If you go to our
11 learning center, the Organic Integrity Learning Center, which
12 has more than 10,000 account holders and a whole lot of
13 content, before every meeting, we post a recorded update. And
14 so this is recorded by different members of the National
15 Organic Program, and it covers really a wealth of information
16 about everything that has happened since the last meeting. So
17 it is sort of our codified update of successes and projects
18 since the last time we got together.

19 We started this actually in the pandemic, so we would
20 have more time at this meeting for Q&A. So instead of me
21 talking for 45 minutes, I'm going to talk much less so that you
22 can go and watch the updates online and we have more time for
23 engagement here.

24 Okay. The main topic that we're going to talk about
25 in this Part 2 update is strengthening organic enforcement,

1 because it is such a critical part of everything right now that
2 we are -- most things that we're doing at the program. There
3 is no part of the program that has not been touched by
4 strengthening organic enforcement, and it is making a
5 significant difference. I will be talking about what those
6 differences are in a few minutes.

7 But first, for folks who aren't around this every
8 day, we're going to do a little bit of a tutorial, because one
9 of the key parts of strengthening organic enforcement is import
10 certificates, which is also linked to certification. So again,
11 for those who aren't around this every day, the two biggest
12 parts of the strengthening organic enforcement final rule,
13 which was published a long time ago, but went into the
14 compliance phase in March of this year, so it's been in full
15 effect and in compliance mode for about eight months now. The
16 two huge pieces of it were certification, so covering more
17 entities in the supply chain that had not been certified
18 before, and NOP import certificates.

19 So those were the most expensive parts of the rule,
20 as folks getting certified who hadn't needed to be certified
21 before, and NOP import certificates. So this is the landscape
22 of how that works. And so we have certified farms and handlers
23 in other countries. They provide -- they have to be certified.
24 They provide their product to exporters who are handlers, who
25 also must be certified. It is that exporting handler that gets

1 the NOP import certificate from their certifier. So it's
2 actually the exporting entity certifier that issues the NOP
3 import certificate.

4 That NOP import certificate -- so we've got lots of
5 new acronyms under SOP, it's called the NOPIC. I still call it
6 the import certificate. It is provided to a U.S. importer, who
7 also must now be certified organic. And so we're going to look
8 at some numbers to see what the impacts of that have been in a
9 couple minutes here. But that NOPIC, the import certificate,
10 is the link. It's the handshake. So for folks who have been
11 listening for me to two years are used to this handshake across
12 the border, it has to be a handshake of certification so that
13 we have traceability across the border.

14 Those importers are also certified. And so we have a
15 chain of certification here that we did not have before. And
16 we have NOP import certificates, which actually are telling us
17 for the very first time what and how much is coming into the
18 country. So I think it's good to just do a refresh of how this
19 framework works for import certificates.

20 Now I'm going to broaden out a little bit to kind of
21 where we are with SOE. So I've just talked about that
22 importance of the handshake across the border, of having more
23 entities along the entire supply chain getting certified. And
24 that has happened. There are many operations that have gotten
25 certified that were not certified before. And, in fact, we've

1 seen a number of operations that really should have been
2 certified before but weren't, who have now gotten into the
3 certification fold. And that is helping on multiple levels.

4 And so the handshake really gives us leverage so that
5 we can do investigations more easily. It's much easier now to
6 fulfill that promise of organic integrity from farm to table,
7 consumers trust the organic label, actually getting from farm
8 to table and back again.

9 So previously when we were doing investigations,
10 often we would lose the trail. We would lose the trail at the
11 uncertified handler level. Now we're able to much better do
12 that traceability. And I'm going to talk about a case study in
13 a couple of minutes here where that is absolutely working.

14 Brokers and Customs and Border Protection, CBP, are
15 actively stopping product. Okay? Now you're not going to see
16 that always of what's happening to not bring product in. But
17 we are hearing daily, weekly, from brokers who have not let
18 product in because it didn't have an NOP import certificate.
19 Okay? And so both the brokers and CBP, that the importance of
20 that import certificate is that they are not allowing product,
21 and they're doing that on our behalf. So they're saying, I'm
22 sorry, can't bring it in.

23 And so what's happening to that product? A lot of it
24 is being turned away. And so it's going -- it's leaving the
25 United States or it's actively being destroyed. So we have

1 heard of a number of products that have been destroyed.
2 There's also a new code called reconditioning that brokers can
3 use to mark a product that was initially labeled as organic but
4 doesn't have an import certificate, so it cannot be represented
5 or sold as organic. It is a reconditioning code, meaning in
6 the system it is flagged as a product that cannot be -- it's
7 being let into the United States but cannot be represented or
8 sold as organic.

9 Now the benefit of that code is we get a copy of it.
10 So we get a copy of that listing. We see all these imports
11 coming in in our system, and we are able to then contact the
12 importer so that they can demonstrate the fact that that
13 product did not enter the organic market. And so that is a
14 part of the oversight mechanisms that are brand new and were
15 not possible before this rule came in place.

16 So we're still kind of determining all the best ways
17 of doing that follow-up. But the fact that all those importers
18 have to be certified now has a level of accountability there
19 that we did not have before. Because if these importers allow
20 that product to be represented or sold as organic that needed
21 to be reconditioned because it didn't have an import
22 certificate, they can lose their certification for having done
23 that, for allowing product into the market.

24 So there are a number of steps here that can protect
25 the market in terms of just not letting it in at all, re-

1 exporting or reconditioning it, and then we can trace to make
2 sure that product didn't actually get sold or represented as
3 organic.

4 Customs and Border Protection has already blocked a
5 number of shipments using our trademark protections. So for
6 example, they've blocked shipments of sugar, of coffee, and of
7 more than \$120,000 worth of packaged goods, approximately one
8 every couple of weeks of product coming mainly from China.
9 That's packaged goods with the organic seal that is not
10 certified. It's not coming into the market now because of the
11 trademark protections.

12 So both Customs and Border Protection and brokers
13 themselves are actively involved in this. I now spend more
14 time going to brokers' conferences and talking about the
15 organic rule than I am going to organic conferences. They very
16 much are on our side. Brokers can lose their license if they
17 don't follow the rules. So the other thing we're looking at in
18 the data is if things are coming through without an import
19 certificate, we can follow up with the exporter, we can follow
20 up with the importer, or we can follow up with the broker, and
21 really figuring out which one is the best depends on the
22 shipment and kind of the circumstances. And we're still
23 figuring out all those workflows.

24 So product is being blocked as a result of SOE. Now,
25 the third point here is certifiers and strengthening their

1 systems. I want to do a huge shout out for certifiers. They
2 have fundamentally updated their systems, and they are
3 introducing those updates with operations. They're also
4 dealing with some acknowledged technology challenges that we're
5 having at the program. We had really no idea how many import
6 certificates were going to be generated through the Organic
7 Integrity Database.

8 We built a system called Global that is part of
9 Organic Integrity Database, but it is taking a tremendous load
10 from all these import certificates. And we've had some
11 challenges with the USDA technology infrastructure, as well as
12 some OID, Organic Integrity Database, system challenges.

13 So I want to acknowledge that not only are certifiers
14 working extremely hard to implement and exercise strengthening
15 organic enforcement right now, they've also had to deal with
16 some technology glitches. So I want to acknowledge that that
17 is, I'll talk about it again a little bit, a real top priority
18 for us as a program is getting that system stabilized.

19 We're making very good progress on it. We know where
20 the challenges are, but it remains a challenge.

21 Okay. I want to give another example of, so we have
22 the near-term win of brokers and CBP stopping a product, but I
23 want to give an example of a specific investigation that we did
24 that was assisted, aided, facilitated by SOE.

25 We got a complaint about soy imports, so soybean

1 imports, and we know that feed is of significant concern and
2 risk in the market. And so we do pursue complaints. What we
3 need is evidence or at least a signal that gets us to evidence.
4 So we got what I would call a credible but incomplete
5 complaint. Okay, so credible but incomplete, meaning that we
6 got information that told us about a supply chain that there
7 were concerns about, and even the farm. It was a grower group
8 in West Africa that was having -- there were complaints about
9 that particular supply chain and that producer.

10 Now, because of strengthening organic enforcement, we
11 were able to fairly rapidly trace back, so figure out where the
12 operation was to gather information to do an investigative
13 request to the certifiers, a certified operation. So ask the
14 certifier to investigate it, because the certifiers really are
15 at the front line of this work. And so they're the ones who
16 would initially investigate a complaint, because it will often
17 not only identify a challenge with the operation but also with
18 the certifier's system. And we can only get better if the
19 certifier's systems get better.

20 We were able to then trace it back to the importer
21 who was certified. So given the requirements of SOE, this
22 importer was certified. So they are under certification
23 control. So as a result of that work, not only was the
24 operation put under a settlement agreement with the certifier,
25 so the certifier entered into a settlement agreement with the

1 operation for them to improve their systems. The certifiers
2 improved their systems. The importer received a notice of non-
3 organic status. And that product has not entered -- most of
4 that shipment has not entered the U.S. market. Okay?

5 Now, those are connections and outcomes that are
6 directly supported because of strengthening organic
7 enforcement. So millions of dollars that did not enter the
8 U.S. market because of the data and the traceability that we
9 are now able to introduce. That certifier has now acknowledged
10 that their systems needed to be improved and have done so.

11 That's happening around the world. There's a lot of
12 concern about soybean imports. And that story I told you is
13 one of many, many stories. Soy only represents about 5 percent
14 of imports. So we are looking at a very broad set of
15 commodities and imports coming into the country. So I know
16 there were a lot of public comments about feed coming in, and
17 there are a whole lot of different commodities coming in that
18 we have to protect to maintain consumer confidence.

19 So some of our longer-term emphasis points are we
20 really need to determine the best actions for different
21 commodities, countries, and impacts. Sometimes it's best for
22 us to go through the Customs and Border Protection because if
23 we have a repeat violator, we want to work through them. If
24 there is a challenge with a particular broker, we're going to
25 contact that broker. If there's a challenge with a particular

1 exporter, we're going to approach that exporter.

2 It's much easier now when the broker is saying, we're
3 just not letting it in, because legally they're not allowed to
4 let it in without an import certificate. It really allows us
5 to focus our efforts in different ways. But given the volume
6 of imports, deciding what's going to have the maximum impact,
7 the right time, the right place, the right action, is still
8 workflows and business processes that we are really figuring
9 out.

10 Certifiers are such an important part of all of this.
11 So I want to report back on the outcomes of our, what we call
12 the SOE desk audit, where we sent questions to all the
13 certifiers to ask them how they were implementing critical
14 parts of strengthening organic enforcement. What we found is,
15 we have 73 certifiers. About two-thirds of them are in good
16 shape. They have updated their system to reflect the
17 requirements of SOE and are implementing those systems. About
18 one-third of the certifiers received non-compliances because
19 they had not fully updated their systems to meet the
20 requirements of SOE. Three of those were significant firm
21 language saying, if you do not respond effectively to this
22 notice of noncompliance, the next step will be a notice of
23 proposed suspension.

24 Now, of the one-third who received non-compliances,
25 two-thirds of those were international certifiers. So the ones

1 that are having the most challenges are international
2 certifiers. The other third were small domestic certifiers who
3 did not have certain procedures, like how to do supply chain
4 traceability audits. So we're going to talk a little bit about
5 that in a couple of slides, about sound and sensible SOE for
6 small certifiers and operations.

7 In the last six months, informed both by SOE and
8 other problems, we have issued three notices of proposed
9 suspensions to certifiers. One led to the surrender of a
10 certifier, and then two are in various stages of the appeals
11 process, because if a certifier receives a notice of proposed
12 suspension, they do have the option of appealing that, and so
13 we are reviewing those at this time.

14 One of the common problems, the most common problems
15 we're seeing among certifiers who do not have effective control
16 systems is a lack of effective control over subcontractors. So
17 as they are expanding into new countries, they may hire a
18 company to do their certification activities within that
19 country, but they're not adequately overseeing or controlling
20 those subcontract organizations.

21 So that has us understanding where some of the
22 challenges are, allows us to exercise better oversight steps
23 over those certifiers. So as an example, I'm not going to go
24 into too many details about this, we issued a directive to
25 certifiers working in Africa. That is a big -- it's a big area

1 of concern for all of us. It is a fairly detailed directive
2 that asks the certifiers to take very specific steps and report
3 back to us on elements of their oversight systems.

4 I see those directives continuing. We use them very
5 judiciously because we do know that it adds effort and time and
6 cost, but where oversight needs to be improved, there are
7 valuable tools for doing that.

8 We're continuing to watch and learn from the data
9 patterns and flows. Again, in the last eight months, we've
10 started to see data we had never had access to before. So
11 watching the different patterns is helping us learn kind of
12 where to go next. We're also blending education with
13 enforcement. So calls and outreach to brokers so they really
14 understand what we're trying to achieve and what the NOP import
15 certificate is and how to deal with it. But we are also taking
16 enforcement.

17 Again, CBP has blocked shipments for us. We've been
18 using their authorities. But we've also been using our own
19 authorities with notices to entities. And as I mentioned, the
20 notices of proposed suspension with certifiers. Certifiers,
21 particularly under SOE with the broader coverage of
22 certification, certifiers really are the touch point for being
23 able to make systemic improvements across the system.

24 So let's take a look at some numbers here. So we
25 have sent over 1,000 notifications to uncertified importers. A

1 lot of this was in the early phases of where we saw imports
2 coming in after the rule was in the compliance phase that did
3 not have import certificates. So we did start with a warning
4 letter system. We have been doing follow-up warning letters
5 and phone calls. There have been, for example, some large
6 companies that are actually certified but for some reason
7 haven't been using import certificates. So we've been calling
8 them to say, what's going on here? You're carrying
9 certification. Why don't you have an import certificate? And
10 that's been useful because we are seeing some policy questions
11 of, well, which comes first, the bill of lading or the NOP
12 import certificate? What's the timing? And how do all these
13 organizations intersect?

14 This is a new rule. And so learning what the
15 challenges are so that we can better educate the market is
16 important.

17 Now, over 2,400 handling operations in the U.S. got
18 certified between January and mid-October. That's two to three
19 times the volume of last year at this time. We suspect that a
20 lot of those are importers. So the message is and has gotten
21 out that folks needed to get certified, and they have done so.

22 Okay. Now let's take a look at some import
23 certificate data. Again, we did not know what to expect here.
24 More than 100,000 NOP import certificates have been issued from
25 the Organic Integrity Database since the rule was in its

1 compliance phase in March. So more than 100,000 NOP import
2 certificates. The import certificates, again, are generated by
3 the exporter and provided then to the importer for broker
4 entry. So of that 104,000, about half of that have been
5 converted into actual imports in the ACE system. So ACE is the
6 import system, the Customs and Border Protection import system.
7 So as of kind of beginning of October, about 49,000 of those
8 import certificates issued from our system had been "turned in"
9 as imports that were entering into the United States.

10 We're getting better and better in terms of
11 compliance level. So over the last -- about the last month or
12 so, we're now seeing 88 percent of entries into the Customs
13 system are associated with valid import certificates that came
14 out of the Organic Integrity Database. So that's a really
15 solid B-plus. So when I talked to you earlier this year, we
16 were at kind of the mid-low 80s. We're now at the high 80s,
17 and it's getting better. So that's because of brokers not
18 accepting product in, and it's because more people are
19 certified in getting those import certificates.

20 Importantly, 60 percent of our import certificates
21 are issued by USDA certifiers. The rest are issued under
22 equivalence arrangements. So I'm going to talk a little bit
23 about some of the -- both opportunities and challenges that
24 that provides in a few minutes. What it means is that 40
25 percent of imports are not directly overseen by USDA. They're

1 overseen by our trade partner countries. So Canada, European
2 Union, and Japan. That's a lot of imports.

3 So the list of top ten imports has been shifting a
4 bit over time based on seasonality. Right now, this is kind of
5 a snapshot of the last couple of weeks or months or so. Beef
6 has continued to be actually at the top of the list in terms of
7 imports. Coffee and soybeans are up there. Olive oil has been
8 on the list consistently. Right now, we have bananas,
9 avocados, fruit juice, cucumbers, blueberries, and maple syrup
10 are just in the last month or so top imports. Over the summer,
11 you saw more berries on the list. So there is a shift.

12 We need to see what happens for the first year of
13 data so that we can really, I think a lot of folks kind of
14 guessed what the seasonality of these things are. But it is
15 interesting to see what persists on the list and what changes.

16 Here's looking at the tracking over time. Part of
17 what we're trying to figure out is when do we kind of hit an
18 equilibrium here. This is -- you can see the peaks are for
19 weeks because there are fewer import certificates over the
20 weekend. But this is tracking over time since March. So you
21 can sort of start to see kind of peaks and valleys. I'm not
22 sure if we plotted a regression here to change the starting
23 point, how flat the curve would be at this time. So we're
24 still gathering data. Again, a lot of what we're doing is
25 following the trends in the data right now.

1 What we really are looking at here is the percentage
2 of green. So the green are the valid import certificates. The
3 other colors are either a temporary code that had been allowed
4 through September 21st and is no longer allowed, and other
5 invalid certificates or certificates that were not filed under
6 the electronic code but rather under the paper code.

7 So you start getting into all sorts of details there.
8 But the more green, the better.

9 Okay. So reviewing priorities and challenges. A lot
10 of this I've already talked about, so I'm not going to repeat,
11 though I do want to emphasize kind of where we are.

12 First, this is a bit of a mantra for the program.
13 Success brings new problems. We've seen a lot of successes,
14 but we've also seen a lot of new problems. So about every two
15 weeks, we're seeing a need to kind of shift messaging or, wow,
16 there's a new policy that we hadn't thought about. They're
17 just things that we did not anticipate because we just didn't
18 know what we didn't know with a rule this big.

19 So here's an example of a policy problem we needed to
20 work through. An international certifier surrendered its
21 accreditation and decided it wasn't going to be in the markets
22 anymore. When a certifier surrenders, their operations remain
23 certified until they either surrender or are suspended or
24 revoked. So now you have those operations who are still
25 certified but don't have a certifier.

1 So this is how the regs work. So the question was,
2 well, how do they get an import certificate? So these are
3 legitimate businesses that continue to be certified and are in
4 good standing until they're kicked out. How do you get them an
5 import certificate? Because we can't issue those at a program
6 level.

7 So those are examples of policy questions of how do
8 you support legitimate trade despite these things happening.
9 And so we're dealing with those on an ongoing basis. I said
10 already that technology challenges are a big problem and are a
11 top priority for the program. We are investing technology in
12 -- investing money in resolving some of the technology hosting
13 and infrastructure challenges that we have.

14 We also did a lot of work to get end users what they
15 needed for the import certificates, but that's also led to what
16 we call technical debt. And so that's sort of technical
17 improvements that are needed in the code that no one ever sees
18 that actually makes the system run smoothly. So that really
19 needs to be our top priority right now.

20 We're continuing to maximize our CBP and broker
21 relationships. Again, we're going to a lot of brokers
22 conferences and doing a lot of outreach about the import
23 certificates. They're actually pretty affirming. I went to
24 one in San Diego last week, and a number of folks approached me
25 on the way to the talk and afterwards saying that they had

1 indeed turned away a product because it didn't have an import
2 certificate. So, again, a whole cadre of folks that are
3 working on our behalf out there.

4 Again, certifier capability is an absolute critical
5 factor in making sure this rule is effective in the long term.
6 I think a lot of certifiers are upping their game as a result
7 of SOE. It's not been without challenges. It is ultimately --
8 the certifiers are really at the front line of implementing
9 SOE.

10 Enforcement approaches with repeat violators. Again,
11 we're kind of experimenting with authority. So how can CBP
12 help us? Often when somebody's breaking an organic rule,
13 they're also breaking another rule. So we have a staff member
14 in a group called CTAC, which is the Commercial Targeting and
15 Analysis Center, and they are helping us put certain importers
16 on watch lists to make sure that those products are compliant
17 and to take action when they're not.

18 We have a real opportunity to strengthen equivalence
19 arrangements. So for folks who are not as familiar with this
20 whole trade partner thing, we have equivalence arrangements
21 with governments around the world. Again, the biggest ones are
22 the European Union and Canada. So what folks sometimes don't
23 know about equivalence is when we have a trade arrangement, an
24 organic trade arrangement with another country, we do not
25 directly oversee those certifiers and operations. So if we

1 suspect a problem in another country's system or that one of
2 their operations has violated, we don't go directly to that
3 certifier or the operation. We go to the government, and we
4 say we have a concern. Here's what the concern is. Here's any
5 evidence that we have. But it's really up to that trade
6 partner to do the investigation.

7 Also, systems are equivalent but not identical. And
8 so our SOE rule put a lot of provisions in place, but those
9 provisions are not necessarily yet in place or may not be in
10 place in other government systems. So part of what we're doing
11 now is really looking at other government systems and are they
12 actually -- what needs to happen for those to continue to be
13 equivalent and how do we ensure a fair and competitive market
14 when we suspect that there is a challenge with one of the
15 operations or even one of the certifiers under those schemes
16 given that we don't directly oversee those certifiers and
17 operations.

18 Again, we're talking about 40 percent of import
19 certificates coming in under those arrangements. So just as an
20 example, because I know that soybeans are of interest
21 particularly in this community and in this room, 25 percent of
22 the soybeans coming into the United States are actually brought
23 through Canada. And so there's some processing happening in
24 Canada, but there's also just some transshipments going through
25 Canada. They come in under a Canadian import certificate, and

1 so we don't always have insight into where they're actually
2 coming from. So that's the next challenge of strengthening
3 organic enforcement is really working with those other
4 countries for active conversations with the EU and with Canada
5 about those systems.

6 EU is a particular challenge because they are
7 operated through member countries. So if you think our system
8 is complicated, wait until you get a load of the EU. And so
9 each of those countries has their own sort of system that's
10 united under the commission.

11 One of the challenges we're seeing, it's not a huge
12 volume, but I'm going to just call it a loud industry, is the
13 alcohol beverage, the wine industry. And we are seeing some
14 challenges with wine exports from the EU in terms of their
15 compliance. We're seeing entire countries that seem to be
16 struggling -- their certifiers are struggling with getting
17 import certificates issued before the product leaves the
18 country. We're also seeing challenges with those operations
19 aligning with the critical variances under the trade
20 arrangement, which says that wine coming into the United States
21 can't have added sulfites.

22 Now I mentioned this at the April meeting because it
23 was one of the very first patterns we saw. It did allow us to
24 do a lot of outreach to the EU, but it's highlighted the need
25 for that ongoing communication about these critical variances.

1 In wine, it's no added sulfites. In dairy products,
2 it's animals can't be treated with antibiotics before coming in
3 here. Very important critical variants, making sure that all
4 of those operations under all these schemes know that and
5 follow that is a challenge for the equivalence arrangements.

6 I'm going to take a sip of coffee, and then we're
7 going to move on. It's been a big six months, so there's a lot
8 to cover here.

9 Now we're moving to big picture future vision stuff.
10 SOE has really identified some challenges with the system, and
11 so it is a good time for all of us to reconceptualize
12 continuous improvement. So for the past few years, continuous
13 improvement has been framed as new standards of adding
14 regulations, of advancing regulatory priorities.

15 I think we got to, as a community, reconceptualize
16 continuous improvement because here's what's happening. I
17 think I was very, very clear in saying SOE should not hurt
18 small farmers, and I still believe that, and yet it is hurting
19 small farmers.

20 And so the question is, how do we as a community fix
21 that? So trying to unpack, okay, what happened? This rule is
22 not supposed to be having those types of impact. What
23 happened?

24 And so in chatting with a lot of folks about this,
25 one of the kind of root causes, and it doesn't cover everything

1 but is a big challenge, is the organic system plan. That
2 anytime you do a new rule, certifiers are going to end up
3 adding questions to the organic system plan. So here's a new
4 rule, new requirement, so I'm going to add questions to the
5 organic system plan.

6 And so what that has led to is more questions that
7 operations need to look at and a sense of overwhelm. And so I
8 might be a small farmer. I'm looking at this OSP, and it could
9 be that questions 17 to 25 don't apply to me, but I still have
10 to read questions 17 to 25 to figure out whether they apply to
11 me or not and even what they actually mean.

12 And so we have a -- because organic is size neutral,
13 that's a characteristic of the regulations, it is meaning that
14 when certifiers are updating their OSP and, as a result, their
15 inspection plan, the more regulations you add, the more burden
16 that you ultimately get. And so the question is, therefore,
17 what -- what do we do about that?

18 There are multiple barriers to sound and sensible.
19 There's regulatory barriers. There are cultural barriers. So
20 one example is I mentioned that small certifiers were getting
21 non-compliances because of strengthening organic enforcement.
22 The most common one was that they didn't have a procedure for
23 doing supply chain traceability audits.

24 And so you might ask, well, gosh, you know, small
25 certifiers, if they're just overseeing small farms that are at

1 the beginning of the supply chain, well, why do they need to do
2 -- I mean, what -- that doesn't connect. But the regulations
3 say you need to have a procedure for supply chain traceability
4 audits. And so it is a challenge of how do you differentiate
5 -- how do you differentiate systems to reflect the needs and
6 the realities of a small domestic farm versus a huge exporter
7 that is handling organic goods from, you know, multiple
8 sources. These are different systems. So how do we reconceive
9 continuous improvement, the OSP, and everything else to be able
10 to accommodate that?

11 There is good work happening here. So the Accredited
12 Certifiers Association has done some really good work to help
13 certifiers have models and templates and examples that help
14 make it real. There's also good work happening in moving
15 towards a common OSP. So I've been talking about this for a
16 while. We managed over the last year, ACA put together a
17 transition production plan for both crops and livestock. Those
18 are a really good step. And I'm hearing more and more from
19 certifiers who really want to take the final step to a common
20 OSP.

21 So I'm saying as a program that if a coalition came
22 together and developed a common OSP that they felt was
23 compliant with the regulations, we as a program would review it
24 and would voice our support for it. It is time. It is time.
25 It is only the one step towards a fundamental rethinking of the

1 system.

2 Collective work is really needed to innovate this
3 system. I do think we need a fundamentally separate approach
4 for the small end of the market. Broadening out, the other
5 piece here is a whole layer, a whole collection, hundreds,
6 thousands of them of small organic farms who have chosen not to
7 pursue certification for whatever reason.

8 So we often talk about certified operations that are
9 exiting the system, leaving the system. We also want to think
10 about all of those farms who never entered in the first place.
11 And so TOPP is serving them, but how could we reconceive of a
12 system that would invite those farmers into the system, invite
13 them into certification that made certification truly
14 accessible, truly sound and sensible.

15 And so collective work is needed to articulate what
16 that new model could look like. I don't have the answers here
17 today, but this is a great forum for asking those questions and
18 sparking work throughout the community on how to think about
19 the system differently.

20 Systems that grow too complex collapse. So the
21 question is how do we innovate to prevent that.

22 Our team at NOP stands ready to have that
23 conversation with you. This is a picture of all of us taken in
24 June 2024. Continuous improvement also starts with this group.
25 So we appreciate that as we're thinking about a new future and

1 as we're thinking about certifier systems in a risk-based and
2 sound and sensible approach, that that means we need to change
3 too, that our auditors need to think differently when we go out
4 for an audit of conceiving of systems in a sound and sensible
5 way. We have our audit checklist too. So we own this problem
6 with you, and we want to work together to craft a future that
7 can serve everyone of any size that is really implementing the
8 organic principles and living the organic vision every day.

9 So I want to thank you all for being here today,
10 being part of this conversation, letting me kind of walk
11 through all of this, and I am happy to take questions from the
12 Board.

13 CHAIR SMITH: Thanks, Jenny. That was certainly a
14 lot of great information, as always.

15 Okay. Questions from the Board. Oh, I see one from
16 Allison.

17 BD. MEM. JOHNSON: Thank you for all this great
18 information, Dr. Tucker. My wheels are turning, especially
19 around the accessibility pieces you mentioned there at the end.

20 But as far as questions, I was really impressed by
21 the statistics that the under secretary shared with us this
22 morning about the Organic Transition Initiative, and especially
23 TOPP, and in the context of what we'll be discussing at this
24 meeting, I'm curious if you could share what TOPP has done or
25 could do to spur more growth in the organic seed market.

1 DR. TUCKER: Yes, seed is a really important topic,
2 and I'm glad that the Board is working on that agenda item. I
3 think, you know, seed is part of that organic ecosystem, so I
4 think the question is how could we fold some of the technical
5 assistance that's happening in the regions? How do we get
6 expertise, folks who have expertise in seed, into those
7 conversations, right?

8 The number and range of topics that regional partners
9 and their partners are doing around the country are really
10 remarkable. You know, some are very, very highly technical
11 topics. Some relate to business development. I mean, it's
12 amazing, the range. And so I think for those who have
13 expertise in seed and have a passion in helping transitioning
14 or existing farms with seed issues, get plugged into the TOPP
15 network. They're here, and there's absolutely no reason why
16 there couldn't be workshops and technical assistance related to
17 seed as part of the TOPP outreach and community.

18 So I think some of it is connecting the right people
19 with the right partners at the right time for the right topics.
20 But I think one of the wonderful things about TOPP is it's
21 incredibly flexible to allow that to happen. We have different
22 things going on in different regions. It is a very distributed
23 network of leadership, which I adore. You know, when you go to
24 a regional meeting and you look around the room, you see all
25 sorts of leaders in organic are not necessarily in this room

1 but are on the ground, as the under secretary said, they're the
2 ones that farmers actually turn to. And so I think if we can
3 get that distributed leadership extended into the seed topic,
4 there's no reason why that can't have a huge impact.

5 CHAIR SMITH: Amy?

6 VICE CHAIR BRUCH: Thank you, Kyla. Thank you so
7 much, Dr. Tucker. As a grain farmer, I really appreciate the
8 focus on integrity and all playing by the same rules. So thank
9 you so much.

10 Oversight and enforcement have been core components
11 of the Board's work agenda. Since we are a process-based
12 system, can you touch on how we can strengthen our systems for
13 compliance, verification for our records, and reconciliation
14 that go beyond just showing paper, and also touch on
15 technology's role in surveillance. You mentioned technology's
16 role in import certificates and the integrity database, but I'd
17 like to understand technology's role for surveillance as well.

18 DR. TUCKER: Yeah, great questions. Process --
19 organic is a process-based standard, and we're all very, very
20 proud of that. It also has its limitations, right? And so I
21 think the work you're doing on testing is really important. I
22 think I often will hear, you know, inspections need to change
23 to really focus on the things that need to be looked at to
24 detect fraud. And the question is, okay, what are those?

25 And I think that folks out who are doing the work

1 know what those are, and if we could find ways in the sound and
2 sensible certification realm to bubble those up. The challenge
3 is when you make that information transparent of, well, here
4 are the critical control points that you look at to detect
5 fraud, the bad guys hear that too, right? And unfortunately,
6 one of the disadvantages of a very open, transparent process-
7 based standard is bad guys are really good at working around
8 it.

9 So let's talk about technology. Again, we're focused
10 right now on stabilizing our systems. I think there is a huge
11 potential for technologies like artificial intelligence, AI, to
12 help with some of this. So -- and this can get a little bit
13 controversial because OSPs, for example, are very, very
14 personal. They reflect what's going on on a farm level,
15 reflect that investment in managing site-specific conditions,
16 which is an essential part of the regulations. And yet, are
17 there ways of using, for example, artificial intelligence to
18 detect inconsistencies?

19 Well, you said in this part of the document this, but
20 over here there's that, and the inspection report when we went
21 out saw this. Here's the list of red flags there where those
22 things don't connect.

23 And sometimes if you have large pools of data, the
24 system's better at detecting things than we may be. So that is
25 another argument for a common OSP.

1 There's technology systems that could actually
2 aggregate all of this data and then see those patterns. So,
3 hey, you're in this region doing this commodity, and you're
4 reporting these types of activities. It might even include
5 something about the soil and water characteristics of the
6 region. Hey, have you considered this material instead of that
7 material? Or other people in your area are doing this instead
8 of that. And are you sure you have a big enough buffer, given
9 what we see about your environment?

10 I think there's tremendous potential out there for
11 that. I don't think we know what that is.

12 At a program level, we have been thinking about, for
13 example, governments issue transaction certificates, and those
14 are things that can be fraudulent, right? Somebody can take
15 that and change it. So could we use artificial intelligence in
16 doing supply chain analysis to detect, that doesn't look like a
17 government document from this system. And then we can go to
18 the government and say, can you either validate this document
19 or say it's not? That's really important.

20 So I think there's a lot of tools like that that we
21 don't yet know the potential of, but I'm really interested in
22 that conversation.

23 CHAIR SMITH: Mindee?

24 BD. MEM. JEFFERY: Thank you. Thank you, Dr. Tucker,
25 and the Standards Division for the work agenda on compost. And

1 I'm hoping you could walk us through the dynamics of receiving
2 a petition to the USDA directly and the distinction from the
3 FACA process, and what those dynamics could look like going
4 forward, especially if the Board passes the compost proposal
5 before us in this meeting.

6 DR. TUCKER: Okay. We're going to move into what I
7 call the civics of NOP. So brace yourselves. This is going to
8 be a regulatory conversation. Okay. Just to warn you.

9 There are two kind of major acts that govern what we
10 do. And at the most simple, there are two phases. So there's
11 the Federal Advisory Committee Act, FACA, which governs the
12 work that you do. So it governs all of this. The outcome of
13 the Federal Advisory Committee Act, the FACA process, is your
14 recommendation. So that's the handoff to the program.

15 At that point, when we get a recommendation, a
16 different act generally kicks in. It's called the
17 Administrative Procedures Act, or APA. And that governs how we
18 do rulemaking. Okay.

19 So there are two kinds of petitions. There's a
20 petition that comes to the Board, so mostly material-related
21 petitions, right, that are part of the FACA process. So they
22 enter into your process. You consider them. And then a
23 recommendation either comes to us or doesn't.

24 And a lot of your recommendations never make it to
25 the APA procedure. So, for example, there might be a petition

1 to add something to the national list. You decide not to add
2 it, not to recommend it for addition to the national list. I
3 can't add a synthetic to the national list without you. So it
4 dies there. It doesn't ever go into APA.

5 Now, a petition for rulemaking is different. So a
6 petition for rulemaking is a tool that is actually under the
7 Administrative Procedures Act. So the second part of that
8 process. We've gotten a few over the last few years. So the
9 petition for rulemaking that you're considering now over
10 compost isn't the first time we've dealt with these. Okay?
11 And so an example was we got a petition for rulemaking related
12 to import oversight a few years ago. And we were able to say,
13 yup, we agree with you. We're working on strengthening organic
14 enforcement. Done. And so that resolved that petition.

15 There was also a petition for rulemaking related to
16 hydroponics. We analyzed that petition, denied that petition,
17 and then it ended up in the court system because they disagreed
18 with us denying that petition. So not the first time we've
19 dealt with this.

20 So the way this petition for rulemaking would work is
21 this petition for rulemaking was directly related to a topic
22 that the Board was already interested in and working on. So
23 what we did was instead of analyzing it at the program level to
24 start, we said the Board is the forum for these kinds of
25 conversations. So we sent it to the Board as a work agenda

1 item. That did not make it a Board petition. I think that's a
2 really important distinction. So it is part of a work agenda
3 item for the Board, but it's not a petition for the Board.
4 It's a different mechanism.

5 So what happens now is you are working on that.
6 That's part of our analysis is having you work on it as the
7 advisory committee. Once you are done with work related to
8 compost, that might be this meeting, it might be next meeting,
9 depending on kind of your proposal process and what you're
10 working on, you are part of the active analysis phase.

11 Once you are done and recommendations come to USDA,
12 we will then combine that process, combine that output with the
13 petition for rulemaking and then do our own analysis and decide
14 what's next. And we do that with everything, right? So all
15 your recommendations that come with the program, they enter in
16 the APA process. We consider kind of all these Board
17 recommendations and then often move them into rulemaking or
18 explain why we can't do rulemaking.

19 So the petition for rulemaking will join the
20 recommendations in that stream, because I've said this before,
21 I only want to do rulemaking on this once, right? So ideally
22 we want the Board to finish this work on compost before we fold
23 it into the petition related to compost and then do one big
24 thing.

25 And so what that thing might be is rulemaking. So,

1 for example, a proposed rule that lays out a number of options,
2 including the recommendation, including the petition for
3 rulemaking, that proposed rule would then go out for public
4 comment. So another round of public comment and then whatever
5 provisions come out of that process into a final rule would
6 then be codified in the regulations.

7 So just because it's in a proposed rule doesn't mean
8 it's going to be in a final rule. That is part of the process
9 that then gets public comment. So there's a whole stream of
10 activity here. With the petition for rulemaking, we deferred
11 it to the Board, but then we do still have a legal obligation
12 to analyze that. We will do that side by side with the Board
13 recommendation and then likely, likely, just based on what I've
14 heard so far, fold that into a rulemaking process.

15 But, again, there will be a proposed rule or even
16 advanced notice of proposed rulemaking, depending on what all
17 of this yields, that will give the public a process under the
18 APA, Administrative Procedures Act, to further deliberate on
19 it.

20 That was a lot. How are we doing?

21 CHAIR SMITH: You're speaking to the right crowd,
22 though, Jenny, when you're having these civics conversations.

23 DR. TUCKER: I think it's important for all of us to
24 understand these processes. I mean, this is the benefit of
25 this system. It is a codified process that people can trust

1 and follow, and sometimes it takes a long time, but this is as
2 much democracy as everything else.

3 CHAIR SMITH: Nate Lewis.

4 SECRETARY LEWIS: Thanks, Jenny. We heard on the
5 public comment webinar that the insect industry is having
6 trouble accessing the organic market due to a lack of organic
7 standards related to their production systems. And we've also
8 seen aquaculture standards and, in particular, wild fish
9 certification not move forward. Can you talk about where the
10 program's thinking about those two areas and sort of non-
11 terrestrial livestock production? Thanks.

12 DR. TUCKER: I appreciate the challenges with
13 insects. You know, insects can be certified under the
14 livestock standards, but I have heard that that is challenging
15 because of the access to the outdoors, which is just new. This
16 stuff just gets so complicated.

17 When I was in high school, I had an experiment with
18 mealworms down in my basement. They seemed perfectly happy,
19 but they didn't have access to the outdoors. So I do think
20 sort of that's its own. I'm not entirely sure. Right now we
21 haven't gotten a Board recommendation on insects. I think if
22 it was a work agenda item that the Board was interested in
23 working on, then let's have that conversation.

24 In terms of wild-caught fish and aquaculture, there's
25 a difference, so I'm going to address them differently. For

1 wild-caught fish, standards were never developed for wild-
2 caught fish. In fact, the Board at the time was not able to
3 even convene a group to make recommendations on wild-caught
4 fish.

5 A few years ago, I'm going to call it 2000. I don't
6 remember exactly. I think it was 2001 or so. We were -- 2021,
7 sorry. We were directed by Congress through appropriations to
8 do a report for Congress on wild-caught fish and on the
9 feasibility of those standards and the community's position.

10 So at the time, we did do a listening session with
11 the community. We gave a report to Congress, and Congress
12 still has that report. So for wild-caught fish, the ball is
13 sort of in Congress's court. We gave them our report that
14 summarized the listening session and the different
15 perspectives. Okay, so that's wild-caught fish.

16 For aquaculture, you know, there had been a very in-
17 depth Board process, and there had been a proposed rule written
18 for aquaculture that actually made it all the way to the Office
19 of Management and Budget. So this was at the end of Vilsack 1,
20 or the Obama administration. It was not -- it was never
21 cleared.

22 So OMB did not clear that rule and ended up coming
23 back to the program, and that's been it on that. I will say
24 indirectly that I think one of the things that was particularly
25 useful with strengthening organic enforcement and doing those

1 rules was that Congress directed the National Organic Program
2 to work closely with Customs and Border Protection to implement
3 the rule and the import certificate. And without that
4 direction, it probably would have been pretty hard to achieve
5 what we've achieved. So all of those things with SOE were born
6 in the farm bill that directed USDA and CBP to work together.

7 So when you're thinking about aquaculture, you really
8 need to think about the other federal agencies that might be
9 involved in or have interests or equities in aquaculture. And
10 I would say that when Congress encourages federal agencies to
11 work together, things tend to happen.

12 CHAIR SMITH: Kim.

13 BD. MEM. HUSEMAN: I'm actually going to take the
14 spotlight slightly up, so I'm not going to ask a question, but
15 more so make a statement about the USDA expands market
16 information for organics and that announcement. I am excited
17 to see that in a space that is extremely opaque, we've brought
18 to light SOE to help create more transparency on product flows
19 of commoditized goods. But then understanding the pricing
20 structure and getting a foundation built to help not only
21 farmers determine crop rotation, also look at ways that if
22 there's an imbalance in some of the markets, the reasons why.

23 Hopefully we get to a point where we can create a
24 WASDE report. And if that's not something that's really in the
25 organic space, but it's definitely in the conventional space to

1 understand the world agriculture supply and demand estimates
2 that are put out very frequently, maybe this could be the
3 foundation to have an OWASDE of some sort eventually.

4 DR. TUCKER: Thank you. I want to thank you for the
5 comment. Market news is part of the Agriculture Marketing
6 Service, so that belongs in a -- it's in a different program.
7 Really, really critical. Market news really depends on folks
8 providing data, so it's one of those giving data for the public
9 good and you'll get the benefits in return.

10 And so Erin Healy is our contact with market news for
11 those reports. I know she's been working pretty closely with
12 them to help communicate some of the organic community needs
13 and just challenges in data collection. So I appreciate the
14 comment and thank you for having seen the announcement. It was
15 a big one for the agency, so thank you.

16 CHAIR SMITH: Brian?

17 BD. MEM. CALDWELL: Dr. Tucker, thanks so much for
18 all this great work with SOE, and I really look forward to just
19 even renewed more efforts in the future. It's wonderful.

20 I had a question, two different questions here. The
21 first one is related to the presentation you gave, and you gave
22 a list of sort of the rankings of the different commodities in
23 terms of import certificates, and I just wanted to make sure
24 that I was guessing that that was just in terms of, like, the
25 number of import certificates and not based on something like

1 tonnage or dollar value, that kind of thing. Just thinking
2 that soybeans was number three.

3 DR. TUCKER: Yeah.

4 BD. MEM. CALDWELL: Corn wasn't on it.

5 DR. TUCKER: Yeah, I actually think there are values.
6 Do we have a phone of friend that can send me the answer to
7 that?

8 Honestly, if we have somebody from my team listening
9 online, I'm looking for you through the moonroof. If somebody
10 wants to, let's put a pin in that and let's see who's
11 listening, who might be able to send. Somebody is asking the
12 right person. Technology is amazing, so I will have an answer
13 for you on that in just a minute.

14 BD. MEM. CALDWELL: Wonderful. The second question
15 is different, though, but it relates to our inerts proposal
16 that's under consideration here, and it proposes two different
17 approaches to inerts, putting inerts on the national list, and
18 I just was wondering if you could sort of outline what are the
19 -- if that got passed with these two different lines in it,
20 what is the future process, and would it potentially include
21 mixing and matching or combining parts of those two aspects of
22 the proposal?

23 DR. TUCKER: I love these civics questions. And so
24 actually it's an application of the civics conversation we just
25 had. So your recommendations coming out of this meeting on

1 this topic will then feed into the APA process, which would be
2 a proposed rule.

3 There's also, I know from 2015, a previous
4 recommendation related to inerts, which is also, you know,
5 recommendations don't expire, and so there may be elements of
6 that recommendation. And then there may be elements of this
7 recommendation that we could, in a proposed rule "mix and
8 match" or propose some type of hybrid that took different
9 pieces of the Board's work to move them forward into a proposed
10 rule process. The public would have an opportunity to comment
11 on that.

12 So the guardrail here in Organic Foods Production Act
13 is we at the program can't add a synthetic to the national list
14 without a recommendation from the Board, in the simplest terms.
15 So the regulatory scholars will, well, actually you should have
16 said it this way, but essentially we can't add a synthetic to
17 the national list without a recommendation from you. So what's
18 really important is that any recommendation from you when we do
19 rulemaking, we can point back to what the Board did and say the
20 Board has said that it wants this to happen. And that happens
21 through recommendations. But we don't have to take verbatim.

22 And, in fact, a lot of the rules that we've done, if
23 you trace the rule back to the Board recommendation, you'll see
24 bits and pieces of different recommendations, or we took this
25 part of the recommendation but not this one. That could easily

1 happen here as well. We just need to make sure that anything
2 in a proposed rule can be traced back to a Board recommendation
3 if it relates to a synthetic.

4 Ah, I was right. The top ten is by value. So back
5 to part one of the question. That list of the top ten, I
6 thought it was, but I didn't -- so I'm relieved. Thank you.
7 Who did that? Was that Jason? Let's do a big kudos to Jason.

8 I will say one of the benefits of having added
9 resources from Congress over the last few years is we've been
10 able to hire folks like Jason. So Jason came to us through the
11 Presidential Management Fellows Program. Jason Edmonson, he's
12 an ag economist, actually. And it's just been -- the whole
13 team is amazing. I'm doing a shout out for Jason right now
14 because that was pretty amazing. But we've got a whole team.

15 That picture at the end of my presentation, a whole
16 team that is protecting this industry every day. So just a
17 good opportunity for a shout out. So Jason, thank you.

18 BD. MEM. CALDWELL: Thank you so much, Jenny. Really
19 appreciate this transparency. It's wonderful.

20 DR. TUCKER: So that took care of? We're good?

21 BD. MEM. CALDWELL: Yeah.

22 CHAIR SMITH: Okay. Carolyn, you're up.

23 BD. MEM. DIMITRI: Thank you, Jenny, for all of that
24 great wonky talk about everything. I have one comment and one
25 question. So I was really intrigued by the discussion about

1 the common OSP because my research tends to be with smaller
2 scale producers. And they always complain, like, we want to go
3 find something and download it and make our lives easy. But I
4 wanted to point out that, in particular, the smaller scale
5 producers that also have a handling certificate are extremely,
6 you know, really in that situation. So I didn't know if you
7 were considering that particular -- that's not my question, by
8 the way. I'm just suggesting you consider those.

9 DR. TUCKER: Yeah.

10 BD. MEM. DIMITRI: Okay. Great. And then my
11 question is, given all of the interesting Supreme Court rulings
12 that we've had recently, I'm wondering if you can comment on
13 how you see that affecting the work of the National Organic
14 Program.

15 DR. TUCKER: Yeah. These are certainly interesting
16 times. So there were three Supreme Court cases. It may have
17 been more, but there are three overall that we've been sort of
18 thinking the most about. And so one has to do with Chevron
19 deference. That has to do with the degree to which courts rely
20 on agency decision making and how much kind of aligned or
21 strayed from Congress's acts -- the acts of Congress.

22 The second one has to do with when you're allowed to
23 contest something in rulemaking. So there used to be a statute
24 of limitations on that. And so that court case changed that.
25 I'm trying not to get into too many details because I'll get an

1 email saying, you misspoke. And so I want to be careful here.

2 The third one actually has to do with the authority
3 of administrative law judges, which sounds very wonky, but for
4 us is really, really important. So when we have an appeals
5 case and it's contested beyond an administrator's decision,
6 that's where it goes is to the administrative law judge. And
7 so there's been a bit of a question as to what is the extent,
8 what are the boundaries of the administrative law judge
9 authority in taking -- having penalties in administrative
10 programs like ours, so regulatory programs like ours.

11 Those are things that impact a whole lot of different
12 agencies. So we are one of many, many programs across the
13 federal government that are kind of considering evaluating what
14 the impact of these decisions are. And I think the reality is
15 anyone who tells you that they know, they don't really know.
16 It's going to take a series of additional court cases. And
17 we're already seeing it in the way some cases are argued about,
18 well, you know, judges are starting to put a line in this,
19 argue from their perspective how they interpret these different
20 court cases.

21 So I think we'll keep a very close eye on it. The
22 team's been going to all sorts of webinars on this, right?
23 Lawyers will talk for an hour, and then they'll say, but we
24 really don't know. I mean, it's sort of the executive summary
25 of that. So certainly something we're very aware of and keep

1 an eye on, but that's going to take some time to play out.

2 BD. MEM. DIMITRI: Thank you.

3 CHAIR SMITH: Amy? Back to you.

4 VICE CHAIR BRUCH: Thank you, Kyla.

5 Dr. Tucker, I have a two-part question on
6 benchmarking. From the community and public comments, we heard
7 specifically about Europe and their efforts on residue testing,
8 risk-based certification, and also organic seed. Do you feel
9 we should harmonize our standards more closer to Europe on
10 those three topics?

11 And then secondarily, I want to have you highlight
12 where our peers see us as leaders within organic standards and
13 regulations.

14 DR. TUCKER: Yeah, I mentioned in my presentation
15 some of the challenges of the trade arrangement. There are
16 also significant benefits.

17 So the EU program, sort of kudos to them. They were
18 actually very, very helpful in that case I mentioned before,
19 because they did have some residue data that we did not have,
20 and they were able to share that residue data with us, which
21 was helpful. And so we're seeing more and more of that
22 collaboration between governments.

23 In terms of harmonization, I think that's always
24 going to be a challenge. Every country has its own or
25 government has its own standards that meets the needs of its

1 people. That said, I think that the collaboration between
2 governments is getting deeper and deeper. There is a working
3 group of all the equivalent countries. They're bilateral
4 agreements, so it isn't a plural, lateral, everybody is
5 equivalent. They're bilateral. But we do come together and
6 talk about standards issues and where there are differences.

7 I do think U.S. is seen as a very strong leader based
8 on strengthening organic enforcement. We are doing -- so the
9 types of enforcement we're doing are supply chain traceability,
10 for example. Our system is still considered a gold standard
11 around the world.

12 And so I think other programs, you know, some -- we
13 used to have a very, very tiny budget, which made it really
14 hard to do things. We have a larger budget that allows us to
15 do things now. There are other governments that still have
16 really tiny budgets, and so they're constrained a bit.

17 But we do talk about how we do investigations. We
18 have shared some of our templates for investigations and the
19 analysis and the types of evidence. Again, every country also
20 has a different judicial system in how they play things out.
21 So I think we are definitely seen as a leader with
22 strengthening organic enforcement. Other systems are changing.

23 EU is a great partner just because they do have
24 differences in their system. There are also challenges with
25 the member country thing. So you have the commission that

1 might be a great partner, and you have this country that's
2 doing all the right things. In this country, you're going to
3 have some problems. So there are some kind of differentiated
4 approaches there. I do think that the working group that
5 brings all these partners together is really important.

6 We will be renegotiating with the EU. That's sort of
7 on the calendar based on changes in their legislative
8 framework. Canada, we continue to have conversations with in
9 terms of how do we together strengthen oversight over that
10 border.

11 VICE CHAIR BRUCH: Thank you. Appreciate it.

12 CHAIR SMITH: I was going to say, I reached the end
13 of my queue, so I was going to do one last call. But Kim, go
14 ahead.

15 BD. MEM. HUSEMAN: Can I ask a follow-up question to
16 that by chance? It's okay?

17 CHAIR SMITH: Sure.

18 BD. MEM. HUSEMAN: The way that I thought about that
19 question, Amy, when you asked that, was about being a leader
20 with bringing products into the U.S. and how other countries
21 are managing bringing products into the U.S. Would you say
22 that those answers would be similar, or is the dialogue also
23 about markets in which we would export products out of the U.S.
24 and help to grow our organic industry by providing products to
25 the equivalent partners as well?

1 DR. TUCKER: Great question. You know, I don't talk
2 about exports all that often, right, because as the regulatory
3 body here, my job is to protect consumers in the United States
4 buying products labeled as organic. Export markets are
5 incredibly important for our farms and businesses in the United
6 States.

7 They also do come into play when we are negotiating
8 with other countries and even when we're looking at enforcement
9 actions. So, for example, there might be a business that is
10 noncompliant in another country, under an equivalence
11 arrangement, and there's going to be all sorts of calls for,
12 kick them out now, they're bad, right?

13 Well, what if one of our operations screwed up,
14 right? We would want to be able to follow our due process
15 rules, allow them to come into compliance and get them -- we do
16 that all the time, right, that operations have problems in the
17 United States. They are given an opportunity under our
18 regulations to come into compliance.

19 We don't want to lose that ability. That's part of
20 continuous improvement. So we always need to be careful when
21 we're dealing with other countries in that we don't want to
22 impose a penalty structure on them that we wouldn't be willing
23 to live with ourselves. And due process plays out across
24 governments. That is a central core principle.

25 So we always want to be thinking about these trade

1 arrangements in ways that are fair and competitive for our
2 farms and businesses, but also support our farms and
3 businesses' ability to export. And that can be a really
4 delicate balance. So it's a good, good follow-up question, but
5 something we always think about. Okay. Do we really want to
6 ask for that? Because, you know what, if we set a tone for
7 that, they can do the same thing to us. Is that what our
8 farmers want? So it's just something we always have to be
9 aware of.

10 Of course, we all want to protect all the markets,
11 but we have to think about third- and fourth-order effects.

12 CHAIR SMITH: Dilip?

13 BD. MEM. NANDWANI: Sorry. One of the goals of the
14 TOPP program is to encourage minority, of course the small
15 farmers, minorities, of course black farmers, and Native
16 American Indians, and, you know, veterans, of course.

17 So you may not have the data at present, I
18 understand, but under secretary earlier this morning gave some
19 very good statistics, 18,000 acreage coming, and there are some
20 other statistics. Anything you want to comment or add any
21 information that how these TOPP programs, there are six
22 regions, as we all know. So far, it has greatly impacted
23 overall, as we heard. But anything you want to comment or add
24 information from that perspective, that how many minorities
25 they are reaching out, any statistics would be great, but in

1 terms of how many farmers, acreage, regions, states, and all
2 they have, you know, impacted and benefited to this community.
3 So thank you.

4 DR. TUCKER: Yeah, great question. We do not collect
5 demographic data related under TOPP. We don't collect it under
6 the organic program either. So, you know, often I'm asked,
7 well, can't you add, you know, different, like, gender, veteran
8 status, race, other things, can you add them to the organic
9 integrity database? And the answer is no, that we do not have
10 that information in the integrity database, and so we also
11 don't collect it in TOPP.

12 What we're looking at in TOPP is where are our
13 partners, and are they in areas that have generally been not
14 part of organic before, because that's how we build diversity
15 is reaching into states and communities where we haven't had
16 organic before, regardless of color, regardless of race,
17 regardless of anything, is where can we build the market
18 overall.

19 So I would say that when we focus on that, of where
20 has organic traditionally been underrepresented, you're looking
21 at actually folks who are in the plain states, who would not be
22 kind of considered, in some of those communities, aren't when
23 you picture kind of underserved, not really what you're
24 thinking about, right? But they are -- they are underserved in
25 real ways.

1 The southeast, I think, is doing a really
2 particularly remarkable job, because that region has the most
3 states that have been traditionally underrepresented in
4 organic. I recently went to the southeast regional TOPP
5 meeting. The diversity around that table was stunning, that
6 there are partners in every single state in the southeast
7 region that are reaching out to communities that have never
8 been involved before.

9 And so you see those stories on LinkedIn. You see
10 those stories just being told at the ground level. They don't
11 always bubble up to the national level, but some of this is
12 local leadership driving change, and then all of a sudden we're
13 going to see it in ways that we never expected, and you can't
14 always predict that in terms of numbers.

15 And so I think one of the things I'm proudest of with
16 TOPP is the number of local leaders that are building organic
17 from the ground up that you've never met before.

18 BD. MEM. NANDWANI: Thank you.

19 CHAIR SMITH: And that question is a great segue into
20 the next part of our programming.

21 We continue to be ahead of schedule, and I want to
22 thank the Northwest TOPP folks for rearranging their meeting
23 agenda to accommodate our ahead of schedule-ness, which is not
24 usually the way we operate here on the Board. So with that, I'm
25 going to turn the mic over to Jenny to introduce this panel.

1 So I know we have some stage setting to do here.
2 I've got to get back to the right file here. Hold on one
3 second.

4 I love this tablet, so sometimes I lose files. Oh,
5 you found it. Okay, you had it there. Okay, thank you. Okay,
6 we good? All right, we are good to go here. So thank you for
7 letting me kind of find my file here.

8 And so it is a true pleasure to introduce our
9 Northwest TOPP leaders, and just like we've done at previous
10 meetings, I'm going to introduce the two leads here, and then
11 they are going to introduce their team. I think many of us
12 have come to see this part of the meeting as truly one of the
13 more inspiring segments, and I know this will be no different
14 from that.

15 Again, I want to emphasize the local leadership that
16 is happening with TOPP, and you're going to hear from some of
17 those leaders today, just as you have in some of our other TOPP
18 meetings and OSB meetings. We are purposely rotating now in a
19 way where we're working our way through all the TOPP regions so
20 you can see these local leaders at work.

21 And so I'm going to introduce first Chris Schreiner,
22 who is the chief Executive officer with Oregon Tilth. Chris
23 has more than 25 years of experience in the organic sector. He
24 completed his degree at the University of Oregon and then
25 worked on a small organic farm that grew diverse specialty

1 crops, selling direct to local restaurants and natural food
2 stores. Since 1998, he's worked with Oregon Tilth. He was the
3 Farm Program Coordinator, coordinating the organic
4 certification process for over 400 farms. As the Quality
5 Control Director, he conducted policy analysis and managed
6 accreditation with the NOP. He's been Oregon Tilth's top
7 executive since 2009, setting the organization's strategic
8 vision. He's developed formal partnerships with traditional
9 agriculture service providers, including Oregon State
10 University and NRCS, to expand access to expertise and
11 resources for organic farmers.

12 In 2014, Chris served on the Oregon Governor's Task
13 Force on Genetically Engineered Agriculture. He also co-
14 chaired the National Sustainable Agricultural Coalition's
15 Research Education Extension Committee for over six years.

16 So, Chris, welcome. It's good to have you here.

17 I'm also introducing Ben Bull, Education and Advocacy
18 Director at Oregon Tilth. Ben has been on -- he comes to our
19 monthly cross-regional meetings with TOPP, which I think are
20 really, really vital in helping to kind of share all of the
21 experiences.

22 Again, one of the wonderful things about TOPP is it
23 can have a lot of diversity across regions based on who the
24 region serves and where we need to grow. And yet, the TOPP
25 leads all come together to do problem solving, to do

1 standardization, where standardization is actually needed,
2 where it would actually benefit the system, and to have common
3 solutions to shared problems.

4 So Ben is always a critical voice in those
5 conversations. So in terms of his background, he oversees
6 education programs, advocacy activities, and partnerships at
7 Organic Tilth. He's worked for the organization for over 11
8 years, previously serving for many years as an education
9 specialist in a joint position with NRCS. That's a fascinating
10 model.

11 He is responsible for program development and
12 oversight, strategic leadership, development activities, and
13 partner relationships. He serves on the Governing Council for
14 the Organic Farmers Association, the Board of the Oregon
15 Organic Coalition, and the Organic Agronomy Training Service,
16 or OATS, its steering committee.

17 Prior to Oregon Tilth, he worked for American
18 Farmland Trust, advocating for protection and sustainability of
19 working lands. He has a B.A. from Wake Forest University, an
20 M.S. from Tufts University, agriculture, food, and environment
21 program.

22 Before I turn the program over to Chris and Ben, I
23 know we have a whole lot of TOPP partners in the room, and all
24 our regional leads are kind of here to support their
25 colleagues. Regional leads, could you raise your hands so

1 everybody can see you? Okay.

2 And then let's add partners. So if you are a top
3 partner in the room, either stand up or raise your hand or both
4 so we can see you. So not just the regional leads, but all of
5 our partners. Amazing distributed leadership in this room.
6 These are the powerhouses that are building the future of
7 organic. So incredibly grateful to all of you.

8 With that, I'm going to turn it over to Chris and
9 Ben. Thank you for being here and for leading us through the
10 next part of this program.

11 MR. SCHREINER: Well, thank you, Jenny, and thank you
12 NOSB members and the organic community. Welcome to Oregon.

13 I'm going to kick off just by connecting some dots
14 and providing some historical context that's kind of led to the
15 Organic Transition Initiative and TOPP in particular, and then
16 let Ben and the team highlight the great work they've been
17 doing here in the Pacific Northwest.

18 So despite growing consumer demand for organic food
19 and steady sales growth, U.S. organic production has remained
20 relatively flat, unable to meet that demand, and we really see
21 this as a missed opportunity. The USDA's \$300 million Organic
22 Transition Initiative marks a historic investment to support
23 organic farming and markets, and it builds on existing programs
24 and existing recommended strategies for change led by the
25 organic community.

1 Back in 2017, Oregon Tilth partnered with Oregon
2 State University and published "Breaking New Ground, Farmer
3 Perspectives on Organic Transition," and that report shared
4 findings from a national survey of over 600 farmers
5 transitioning to organic. We explored their motivations, their
6 obstacles, and as well as the resources they needed to
7 transition successfully.

8 The farmers in that survey consistently expressed
9 concerns about costs, record keeping, production challenges,
10 infrastructure, and access to profitable markets. The report
11 concluded with recommendations on how public and private
12 sectors could support organic agriculture and those interested
13 in transitioning, and several of those recommendations became
14 key components of the USDA's Organic Transition Initiative.

15 One of the farmers in the survey said to us, "One-on-
16 one mentorship with certified organic growers would be
17 tremendous." Farmers in the survey overwhelmingly preferred
18 high contact support methods during transition, with mentoring
19 from experienced organic farmers and one-on-one technical
20 assistance identified as the top two methods of support.

21 Also, more than 63 percents of the respondents cited
22 the lack of organic processing facilities as a challenge, with
23 over 38 percent calling it a major barrier. So proximity to
24 essential infrastructure in the organic supply chain is vital,
25 and this highlights the need for investment in regional

1 infrastructure for processing, storage, and distribution of
2 organic goods.

3 Another farmer in the survey told us, extension
4 agents are available in my region for conventional farmers, but
5 not for organic farmers. And Oregon Tilth has had a formal
6 partnership with Oregon State University since 2009, investing
7 over 300,000 into OSU's Organic Extension Program, which now
8 has six organic extension positions, thanks to some additional
9 state funding we secured a couple years back.

10 Collaborating with OSU faculty has helped address
11 priorities for research, outreach, and technical assistance to
12 farmers. Speaking of technical assistance, since 2010, Oregon
13 Tilth has also partnered with the USDA's Natural Resources
14 Conservation Service, sharing the cost of an organic specialist
15 position at the national level.

16 In 13 years of that partnership, this collaboration
17 has delivered over 170 trainings in 42 states, reaching over
18 5,000 NRCS staff, and they've additionally hosted 68 webinars
19 with over 16,000 participants. Educating NRCS staff about
20 organic systems, regulations, and practices helps organic
21 farmers in meeting conservation goals.

22 Finally, in 2021, Oregon Organic Advocates secured
23 state funding for an organic economic assessment that was
24 published by Business Oregon, the state's economic development
25 agency. That report highlights the organic sector's multiple

1 benefits and makes recommendations for growth in areas such as
2 data collection, consumer education, and incentivizing organic
3 practices for climate resilience. It also promotes organic
4 farming as an economic development strategy and a social
5 justice initiative.

6 So back to the organic transition's three focus
7 areas. Pinpointed organic market development. As we've heard,
8 the organic market development grant program is going to help
9 strengthen organic markets by addressing domestic supply needs
10 and improving that critical processing and distribution
11 capacity in the organic supply chain.

12 Second, direct farmer assistance. The NRCS is going
13 to provide financial and technical assistance to farmers
14 transitioning to organic while expanding its organic expertise
15 through the creation of six positions across the country in
16 each of its three regional tech support centers.

17 And finally, what we're going to talk about mostly
18 this morning with the panel, mentoring and advice. The USDA's
19 TOPP, Transition to Organic Partnership Program, offers
20 regional training and education for farmers. And I'm going to
21 hand it off to Ben to talk more about TOPP.

22 MR. BOWELL: Great. Thanks very much.

23 And could I have the next slide, please? Mine's not
24 advancing. Thanks, Chris, and thank you to the NOSB and the
25 NOP for the opportunity to share about TOPP in the Northwest.

1 So this is just a quick reminder for those of you who
2 aren't familiar with our acronym. It's the Transition to
3 Organic Partnership Program. As the slide shows, it's a
4 network supporting transitioning and organic producers with
5 mentorship, technical assistance, and resources. And as the
6 name suggests, there are a lot of partners involved.

7 So next slide, please. And first off, I would like
8 to give a big thank you to the more than 30 partners working in
9 the six-state region of Northwest TOPP. Thank you. I really
10 appreciate the willingness to partner and to support
11 transitioning and organic producers. And one thing I think is
12 really exciting about this, is a lot of these organizations
13 prior to TOPP were not providing direct assistance to organic
14 producers. So it's really exciting to get the opportunity to
15 partner with them.

16 And next slide, please. I also want to express my
17 deep appreciation to the individuals who are leading TOPP in
18 the five other regions. It is such a pleasure to work with you
19 all. It's a very collaborative group, and I know we are much
20 better off here in the Northwest due to these impressive
21 individuals and organizations. Thank you all.

22 And I also want to appreciate and thank our partners
23 like the Organic Trade Association, Organic Farmers
24 Association, who are leading important national projects. I
25 really enjoy working with you all, and thanks for your great

1 work. I also want to thank the staff at NOP for all their
2 support and partnership in rolling out TOPP. It's been a great
3 collaboration, and so a big thank you to all the staff at NOP
4 who's working on TOPP.

5 And finally, I want to say a big thank you to all the
6 Oregon Tilth team who work on TOPP. I'm really proud of our
7 team and all their work to make TOPP successful here in the
8 Northwest. So a big thank you to all my Oregon Tilth team.

9 So next slide, please. I just want to mention a few
10 quick stats to highlight the work here in the Northwest. So
11 the Northwest TOPP partners as a collective have hosted 61 in-
12 person and 13 virtual events in the last year alone, reaching
13 3,800 individuals. Also in the last year, we conducted
14 outreach at 58 events.

15 Since the start of TOPP, we've worked with 21
16 producers who are now certified organic, 23,720 acres across
17 the Northwest, which I'm pretty excited about. 61 producers
18 applied to be mentors. We've got nearly 35 producers that are
19 active in our mentorship program right now. And also we've
20 been working on the new transitional production plans, those
21 little short OSPs to help people transition. We already have
22 six of those through the pipeline, and they're brand new, so
23 we're really excited about that, too. We get to partner with
24 folks like Nate over there to do that good work.

25 So next slide, please. So I want to briefly

1 introduce the panel, and then I can move out of the way so you
2 all can hear directly from these folks. I wish we had a few
3 hours to talk. We have a lot of partners across our region
4 doing really interesting work, and many farmers with important
5 stories to share.

6 I do think that this panel is representative of the
7 diversity of organic agriculture here in the Northwest. We
8 have a lot of specialty crops with unique markets. In Oregon
9 here, we've got things like hazelnuts and blueberries and seeds
10 and all these things that are complex markets. We cover a wide
11 geography with a range of climates and growing conditions in a
12 lot of diverse communities. So later, you'll hear from folks
13 in Alaska, which has been a really interesting state to work
14 in.

15 So next you will hear from Grace and Griffin of Deer
16 Table Farm. Upon completing the practicum at Viva Farms in
17 2021, they quickly began starting their business plan and
18 getting their farm off the ground. They grow produce and
19 flowers for a variety of channels, including two Seattle
20 farmer's markets and a unique fall/winter CSA.

21 Grace loves building community, works hard at
22 beautifying the farm with her love of flowers, and focuses on
23 some of the business side of things. And Griffin is apparently
24 the best bed prepper around and supposedly the world's fastest
25 pepper picker, which is pretty impressive. He works hard on

1 maintaining the integrity of the soil using limited tillage and
2 focuses on best practices for pest management. And then after
3 those two, we're going to hear from two folks from Farm Connect
4 out of Montana.

5 So first off is Mary. Mary serves as the Beginning
6 Farmer and Rancher Program Director at Farm Connect Montana.
7 Mary oversees all aspects of the Beginning Farmer and Rancher
8 Program, including project and program development, program
9 evaluation, managing the land link program, and organizing
10 classes and workshops across the state.

11 Also Britta is here from Montana. Thank you both for
12 making the trip. Britta serves as a Beginning Farmer and
13 Rancher Manager, overseeing the Certified Farm Startup Program
14 and developing events and workshops, offering technical
15 assistance. She's elated to be weaving her six years of
16 farming experience with her passion for new and beginning
17 farmer advocacy and building resources and support for farmers
18 and ranchers in Montana.

19 And then our final two speakers, we'll have Erica,
20 who's a producer with Blueberry Meadows. Erica grew up on her
21 family's farm, Blueberry Meadows. It's an eight-acre you pick
22 blueberry farm in Corvallis, Oregon. She went on to spend more
23 than a decade working as an archaeologist in federal agencies
24 and in the private sector throughout the West. She has since
25 assumed management of the day-to-day operation of the farm, and

1 in 2023 she decided to transition the farm to organic and is
2 really engaged with a lot of the TOPP support.

3 And we'll also hear from Evie with Regeneration North
4 in Alaska. Thank you for making the trip from Alaska. Evie's
5 the co-founder and principal of Regeneration North, which
6 focuses on collaborative solutions for community and ecological
7 resilience. Evie leads work to develop a foundation for
8 sustainable and inclusive seaweed mariculture industry in
9 Alaska. Evie and her family own Ebtide Ocean Farm, growing
10 kelp in tandem with oysters. She also serves as the governing
11 Board member of the Alaska Food Policy Council.

12 So with that, we'll turn it over to Grace and
13 Griffin.

14 MS. LEMLEY: It looks like I'm up first.

15 Hi, I'm Grace Lemley, and I am one of the owners and
16 operators and farmers of Deer Table Farm.

17 MR. LEHMAN: And I'm Griffin Lehman, also owner-
18 operator of Deer Table Farm.

19 A little bit about us, we farm about three acres in
20 the Skagit Valley to mix vegetables and cut flowers. We sell
21 primarily direct to farmer's markets in Seattle, as well as
22 wholesale through our local food hub.

23 We do all this through an incubator program called
24 Viva Farms. So they provide the lease for land, they provide
25 education and technical assistance to assist farms like us

1 growing and scaling an organic, sustainable business.

2 MS. LEMLEY: Yeah. So Viva Farms is really unique in
3 that they are already certified organic through the Oregon
4 Tilth. So it was a pretty natural progression for us to get
5 certified as our own business. They give a little bit of a
6 timeline of hopes that you start to get certified as your own
7 business within three to five years. So we're nearing the end
8 of our third year. We thought that it would be a really good
9 time for us to get certified as our own business.

10 So we had an amazing experience with Oregon Tilth.
11 Viva was really supportive in anything that we needed in terms
12 of information or working through the application. I think the
13 application was very intimidating for me as a farmer when you
14 don't have any time. Kind of going through that application
15 seems just unattainable, especially during the season. So we
16 started working through that in December.

17 I jumped on a call with Levi with Oregon Tilth, shout
18 out. And I was like, I just need you to be my cheerleader and
19 tell me that I can fill this application out because it's so
20 long. And he was awesome and just said, yes, you can do this.

21 So we just sat down and we worked through it. Viva
22 was there for us to work through any questions that we had in
23 that process. But overall, it was really seamless and it did
24 take a long time. And I think that's something that we hear
25 from other fellow farmers is such a challenge is just they

1 don't have any time to go through this application. They don't
2 have the money to pay the application fee. I think those are
3 the two things that we hear from, like, fellow friends or
4 fellow farmers, especially small scale.

5 And I think that our experience, it's been well worth
6 it. It's been well worth the process. And having the
7 assistance of Oregon Tilth, having the assistance of Viva was
8 huge. It would have been really intimidating kind of going in
9 on that on our own.

10 So though we do sell primarily direct at farmers
11 markets, and we have the opportunity to kind of control the
12 narrative and explain to people what our practices are, it was
13 really important for us to get certified organic so that we can
14 put it on the sign. For someone who's walking by and doesn't
15 want to ask the question, what are your practices, like that
16 sign is there to show and really legitimize our business and us
17 as farmers that we know what we're doing. We're in control of
18 our practices, and we're farming really responsibly.

19 MR. LEHMAN: Yeah, I mean, I think Grace really just
20 covered it. I think it's like one thing that we found before
21 we were certified ourselves is that it is an intimidating and
22 expensive process. And that's what we heard from a lot of
23 other farms that weren't. Luckily, like being so close to Viva
24 and having mentors at hand that we could ask and having to keep
25 organic records from the start of our business to send to Viva

1 for their own certification, that kind of initially encouraged
2 us that it is something that's reachable. And that was really
3 helpful to us that we had people that we could talk to and gain
4 encouragement for that, because I think that's like the hardest
5 part is taking that initial step and getting it when time is
6 probably our biggest obstacle, like finding time.

7 As we're in our third year and still kind of just us
8 two, we're starting that hiring process now. But yeah, it's
9 shown to be hugely important to have this organic
10 certification, something that we look for when we shop. And
11 just since getting that certification at our market, we really
12 have seen the value of it. Yeah.

13 MS. LEMLEY: Yeah, I think as we continue to grow and
14 evolve our business too, we found that it was going to be so
15 important if we wanted to sell wholesale to get that
16 certification. It's what a lot of wholesale outlets are
17 looking for, food hubs specifically, even local restaurants.

18 So I think it was really just like a natural
19 progression for us. Yeah, so I think that's a little bit about
20 us. Happy to be here. Thanks so much.

21 MS. ELLIS: Perfect. Thank you. My name is Mary
22 Ellis, and I'm here with my co-worker, Britta, and we're going
23 to share a little bit about our organization, what we do, and
24 how we've been working with Northwest TOPP.

25 Go to the next slide. Maybe? There you go. So we

1 work with an organization called Farm Connect Montana. We are
2 a small non-profit based in Missoula, Montana, and we work with
3 a lot of folks in western Montana, but really our services and
4 everything are provided across the state. And Britta and I
5 specifically work in our Beginning Farmer and Rancher Program,
6 serving producers in a variety of ways.

7 And I'm going to share a little bit about what we do,
8 and then I'll pass it off to Britta to talk a little bit more
9 about specifics on barriers and challenges for those farmers we
10 work with. So go to the next slide.

11 So we provide many different support services to
12 beginning farmers. Most of the folks we work with are small
13 scale beginning farmers and ranchers, so a lot of specialty
14 crop producers. Most of the folks we work with are in their
15 first, like, five years of production, and they're also
16 starting off even smaller than maybe they'll grow to
17 eventually. So most of the folks have five acres or less in
18 production.

19 One of our main programs is our Land Link Program. I
20 know a lot of people are probably familiar with them across the
21 country, but we help connect beginning farmers to land
22 available. And then we also have a Work Link Program, which
23 connects farmers with workers that are applying to work on
24 farms. We also just launched our Farmer Tool Library this past
25 spring, which gives access at a low membership fee, gives

1 access to beginning farmers and ranchers to things like a 42-
2 horsepower tractor and a walk-behind tractor and implements
3 that are really expensive to buy, but maybe you only need once.
4 So really excited about that program and provide that
5 opportunity to beginning producers.

6 We also provide a lot of one-on-one technical
7 assistance. So this comes into play with our partnership with
8 TOPP, and we'll talk a little bit more about that in the next
9 few slides. But we also provide technical assistance on
10 business planning and production planning, as well as now
11 introducing support on how to use certain pieces of equipment,
12 like tractors and implements if folks aren't as familiar with
13 some of those implements.

14 And then Britta will talk a little bit about this
15 too, but our Certified Farm Startup Program is kind of one of
16 our flagship programs. It's a beginning farmer program that
17 helps train folks on business planning, marketing, production.
18 We go through it all within -- right now, it's about a four-
19 month program. They do five virtual classes and then five or
20 six in-person events, where they learn things all across the
21 board from how to start a farm. And they end the certification
22 process with a business plan. So that's a main emphasis of
23 that educational class.

24 And then I'll pass it off to Britta to talk a little
25 bit about some of the challenges and barriers our farmers face

1 that we work with.

2 MS. JANSSEN: Yeah, so through our work with Oregon
3 Tilth and the TOPP program, we wanted to make sure we really
4 understood the barriers that our beginning farmers were facing
5 for pursuing organic certification. And we work with farmers
6 really closely.

7 We have a close network of stakeholders, but we also
8 have a beginning farmer committee that convenes every year in
9 the off-season. And so through these conversations, we -- like
10 Ben mentioned, a lot of the barriers to certification are
11 around record-keeping. It's arduous, it's complicated, and
12 yeah, it takes a lot of time.

13 Another major barrier that we saw for our
14 demographics were sourcing local materials. So things like
15 organic compost was hard to find locally and the quantities
16 that people needed it in. Cost, of course, for certification
17 in, you know, the early spring when most fees are due was a
18 really big challenge, even with the cost share program. And
19 then we also saw farmers just having less experience with
20 organic systems.

21 We work with a lot of new farmers, first-generation
22 farmers, and second-career farmers, so maybe they had a job
23 before they got into farming, and many of whom haven't worked
24 on certified operations and are unfamiliar with the procedures.

25 And then lastly, we do have some local or alternative

1 certification, especially for these small-scale folks. We've
2 had a program in western Montana called Homegrown, which is
3 sort of a local certification among producers. That was sort
4 of, like, filling that role a little bit in our area.

5 But we're seeing changes and new incentives for
6 certification coming through, one of which is that that local
7 certification is kind of not really in operation anymore, and
8 so there's sort of this lack of accountability in the community
9 of, like, what farms are doing, especially these really small
10 ones, and so there's sort of a need for some outside audit,
11 basically, of our operations.

12 We're also seeing pretty rapid population growth in
13 Montana, especially our urban centers, since 2020. Lots of new
14 people moving to the state and increased interest in organic
15 production and organic products, so there's a fair amount of
16 room for education and growth there for our small-scale
17 producers doing direct marketing.

18 And then, you know, we're also slowly getting our GAP
19 certification installed for a lot of these smaller folks that
20 are now being required to have GAP. We just got our first
21 Whole Foods in Montana, and they, you know, require GAP, and
22 many other wholesalers do.

23 So with the growing market, with these, you know,
24 additional, like, food safety record-keeping requirements,
25 certification is a nice pairing with that.

1 You can go to the next slide. Thank you. And then I
2 want to talk a little bit about what we've been doing in
3 partnership with Northwest TOPP. Something that we're really
4 excited about that we've, you know, we've worked with a lot of
5 -- we've had our own mentorship program with beginning farmers,
6 and the big piece is, like, them being compensated for their
7 time. A lot of these farmers have very limited time. They're
8 on, you know -- they're earning minimal amounts throughout the
9 year on their, you know, fine lines. So the compensation in
10 the mentorship program through TOPP has been huge for a lot of
11 our mentors, and they're excited to be working with some of the
12 mentees that we've been able to do outreach with, and that's
13 something we've been hearing a lot of positive feedback on, is
14 just having someone that has designated time to work with you
15 and chat with you about all the specifics, and it's so
16 different from state to state, from region to region, and so
17 just having someone there that you can ask questions to of
18 where they're sourcing materials, like Britta mentioned, is a
19 huge thing, especially in some rural areas of Montana. It's
20 like, where are you getting your compost? Where are you
21 getting certain things? It's really helpful to have someone
22 there that can help answer those questions.

23 We also created an organic certification guide for
24 beginning farmers that's specific to Montana, and that has been
25 -- we've created similar guides on other topics, and really

1 helpful for producers that are in our beginning farmer program,
2 just to have, here's 101, you know, a shorter guide that has
3 all the information, links to where you need to get
4 information, and this is virtual, and we hand it out at
5 conferences and other events, and kind of paired with that, we
6 also did an online organic certification workshop, but that was
7 kind of an add-on to our beginning farmer course, and so that,
8 you know, really allowed people to dig a little deeper.

9 We have small classes, so we can chat a lot about
10 specifics, and then, you know, after that, we're able to pair
11 some of those folks with mentors. And then we also had -- we
12 talked about seed earlier, which is a topic that we've been
13 thinking a lot about too, and we had two organic seed field
14 days, and so we have a local organic seed cooperative in
15 Montana that we work with, as long as we had the folks from
16 Organic Seed Alliance come out and talk, and two full days of
17 just, like, farmers chatting, sharing information, new farmers
18 that were there that were interested in growing and selling
19 organic seeds, and so they were able to learn about cleaning
20 techniques, production techniques, and it was a really fun two
21 days full of just, like, mentorship and supportive community,
22 which is a huge part, I think, that we've seen, is just having
23 other folks around that know how to produce organic seed, and
24 the ins and outs of pieces of that, so, yeah.

25 I'll pass it back over to Britta to share a little

1 more about takeaways that we've had.

2 MS. JANSSEN: You can go to the next slide. Thanks
3 for whoever's doing that. I don't know who you are.

4 So we're still, you know, doing this work, and the
5 takeaways that we've gathered so far, one of the main things
6 that we've heard feedback from our participants in these
7 programs and these workshops is that having information up
8 front for these folks just starting out is crucial. We work
9 with a lot of business planning, and so for farmers that may
10 see organic certification in their timeline, it might not
11 happen their first year, it might not happen their fifth year,
12 but understanding maybe where they want to get to at the
13 beginning and the record systems they might need to be setting
14 up or thinking about early on is crucial for reducing those
15 barriers.

16 Another big takeaway for us is that we've really been
17 able to lean on our existing farmer networks. Montana is a
18 small state population-wise, and it seems like everyone knows
19 everyone. So it's been really wonderful to be able to do that
20 on-the-ground work, finding these mentors that already exist or
21 are already working with new farmers, and then being able to
22 compensate them and provide support to them through the TOPP
23 funding.

24 And this program has just been so wonderful to create
25 that in-person connection and mentorship. It's crucial. It's

1 one of the biggest things we hear from folks is they just want
2 to sit down and talk with a real person that's doing this.
3 They maybe don't want to talk to us all the time. They might
4 want to talk to a real producer. So it's been wonderful to be
5 able to use this program to cultivate that.

6 And then our last takeaway is just that the one-to-
7 one TA has really allowed us to have realistic conversations
8 with our farmers. So the reality is it might not always be the
9 right path for them to become certified, or maybe they have a
10 longer timeline if they want to pursue that. But we're able to
11 talk about the nuances, talk about the benefits, maybe places
12 where it may or may not fit for them, and really provide that
13 personalized support.

14 MS. ELLIS: I think that's everything for us. Thank
15 you.

16 MS. THOMPSON: Thank you. Appreciate it.

17 So yeah, my name's Erica Thompson. I run my family's
18 blueberry farm, Blueberry Meadows, in Corvallis, Oregon.

19 So yeah, it's eight acres, six acres of blueberries.
20 It was planted in the '50s, and my parents bought it in '93.
21 And most of the plants are actually still the original plants,
22 which is really cool.

23 So we have been conventional up until last year. All
24 of our berries are sold on the farm, so having that agritourism
25 model where everything's direct to the consumer on the farm has

1 been really big in making us stay viable, stay profitable. And
2 so we're mainly you pick, and I've been managing the day-to-day
3 operations since the fall of '23. My parents are mostly
4 retired. And in addition to that transition to organic, I'm
5 also working with NRCS. I'll be installing hedgerows in a high
6 tunnel. So some cool, exciting things.

7 Yeah, and it's been really nice being a second-
8 generation farmer, having lots of positive feedback from our
9 customers. So yeah, that's been great.

10 So taking over the farm, I knew I wanted to be
11 organic for a variety of reasons, and I wanted to pursue the
12 certification because it's just like this -- it's a
13 standardized, official thing that people recognize. You know,
14 you can see it, they know what it means. A lot of times, I
15 feel like things like organic practices or organically grown or
16 no spray, that might not necessarily mean the same thing to
17 everyone. So just having this standardized thing that people
18 can recognize seemed like the way to go.

19 And just -- I figured if I'm, you know, doing the
20 thing, I should do it, you know, fairly, be official. So then,
21 knowing that I did want to transition to certified organic, the
22 two main tasks were figuring out organic alternatives to the
23 inputs, like mainly fertilizer and fungicide that we had been
24 implying as a conventional farm. And then, of course, the
25 second part would be navigating the paperwork and the rules and

1 the application process to become certified. And so TOPP has
2 been super-duper helpful on both of those fronts.

3 They set me up with a mentor, an organic blueberry
4 farmer in my area, and they were just super-happy to help, made
5 themselves very available. And it was also really important to
6 them to not be just, like, prescriptive, like, do this, but
7 just to teach me. So I got, like, a whole crash course in
8 things like soil biology and chemistry, really went into it and
9 did some soil tests and went through it line by line and yeah
10 it was -- you know, went through what it all meant.

11 So I ended up getting, like, you know,
12 recommendations and, like, figuring out a set of products to
13 use. So I ended up going from feeling pretty overwhelmed by
14 just all the information out there, all the options, to just
15 having this set of products that get good results that I'm
16 happy with. So that's been great.

17 And then also I have this, like, background
18 knowledge, this kind of general understanding, so if I need to
19 tweak things, I kind of have a bit of a toolkit to use for
20 that.

21 And then for that second part, the certification, the
22 assistance from TOPP has been huge as well. Having a
23 certification specialist was just, yeah, a really major piece
24 in navigating the whole process. So just being able to ask
25 them a wide variety of questions and just, you know, knowing

1 that I have that direct line just has been a huge peace of
2 mind, whether it was, like, the office hours or the e-mails.

3 And so I went from having kind of a spotty
4 understanding of the process to having, like, a much better
5 understanding, being a lot more confident. I mean, there is a
6 lot to be said for figuring things out yourself, being self-
7 reliant, but it is also, you know, a way to just kind of get
8 stuck and spiral.

9 So it was, yeah, very, very great to just have that,
10 whether it was, like, you know, them making sure that a
11 particular product is okay or making sure I'm doing what I need
12 to do to be able to use wood chips from a local arborist or,
13 you know, that I'm documenting and doing the, like, proper
14 cleaning for the old spray tank so I can continue to use that
15 with my new product.

16 So, yeah, just knowing that I have that access, that
17 solid access to information and to answers has been awesome.
18 And so, yeah, as part of that, I completed the transitional
19 production plan, and that was a good experience as well. It
20 seemed relatively painless and, like, kind of a good
21 culmination or, like, tying together of, you know, the office
22 hours and emails.

23 So, yeah, my plan was approved this past August, and
24 I plan on becoming certified transitional, so that's kind of
25 the next step to start working on. So really glad to have that

1 connection, that resource to help me as I go.

2 So, yeah, overall, I'm happy with how things are
3 going. Glad with what I've done so far. And really, yeah,
4 really appreciative of all the help that I've had so far. So,
5 thank you.

6 MS. WITTEN: Hi, I'm Evie Witten, and as Ben said in
7 his nice introduction, I wear a couple of different hats,
8 probably like many of you in the room.

9 I, in my day job, I'm an ecologist and work on a
10 variety of projects that are climate and, these days, kelp-
11 related. And my family and I also own and operate a small kelp
12 and oyster operation in Kachemak Bay, Alaska. And I've been
13 working with TOPP over the last year or so on two different
14 projects.

15 We actually might want to change the slide. And,
16 yeah, there we go. I've been working with TOPP on two
17 different projects. The first was I was brought on to conduct
18 an assessment of the needs for organic certification in kelp
19 mariculture in Alaska.

20 Kelp mariculture in the U.S. is a relatively nascent
21 industry. People have been growing in Maine for about the last
22 decade or so. It's more in the last five years in Alaska. And
23 there's been a question around, you know, if we have resources
24 available and if there were markets, are there markets for
25 kelp, for organic certified kelp? Should we be providing that

1 kind of support? So that was the first project that I started
2 on. And I'll address that one first.

3 But the second project that kind of grew out of it
4 was a realization and a need to bring together a national
5 process to align the protocols for certifying kelp operations.
6 Because what we found in the Alaska assessment was that because
7 this is such a new thing for organic certifiers and because the
8 industry is relatively new, we were approaching it differently
9 in different geographies.

10 So I'll talk about the Alaska assessment first.
11 There's another slide. So the objectives of this assessment
12 were to first figure out, what are the markets? What's the
13 relative need? And that's really tied to what are the markets
14 for organic certified seaweed.

15 And then if we have markets and there is demand for
16 organic, what are the barriers to certifying farms and other
17 operations? Importantly, processing operations.

18 And then thirdly, again, if we have that demand and
19 we can overcome those barriers, or how do we overcome those
20 barriers? What kind of support can we provide? What exists
21 already in the state for supporting transition to organic?

22 And the next slide. And what we found in this
23 assessment was that there is demand for organic certified
24 seaweed. And I think we went into it thinking it would be
25 primarily in the food markets. And what we found is that there

1 are a number of different entities and people that have looked
2 at it. I kept coming across this same phrase over and over of,
3 you know, the profile of someone who's going to buy a kelp food
4 product closely resembles the profile of an organic products
5 consumer. And so it follows that for kelp food products,
6 people are going to be looking for that organic label.

7 But then interestingly what we found is that in other
8 markets for kelp, of which there are many, kelp is going into
9 bioplastics, it's going into nutraceuticals, it's going into
10 textiles, it's going into skin care products, biofertilizers,
11 animal feeds. That for many of those other markets, there was
12 also what we began to call virtue signaling, that even if it
13 was not a consumable product, that people were looking for that
14 organic label. For example, like on a bioplastic, your straw
15 is made out of kelp and it's organic kelp, is what the
16 producers want to show.

17 So the findings were we had demand for organic
18 certified kelp, but the flip side of that is that many of those
19 markets are also really nascent. They're new markets. They're
20 startup companies, and it's a slow process.

21 So when it got to the barriers, the first one was for
22 kelp producers to really understand who their buyers were going
23 to be, what market am I as a kelp producer going to fit into,
24 who am I really going to be selling to. And it's difficult to
25 know when your buyers are saying, well, we think we want X

1 number of pounds in the next growing season, but we don't
2 really know yet. So there's just a lot of new happening.

3 So the first barrier was around figuring out the
4 markets. Okay. We're going to take the gamble that it's
5 probably going to be -- we're probably going to have demand for
6 that organic certification, but we don't actually know if we're
7 going to have a buyer show up next season or not.

8 And then the other barriers that we found really had
9 to do with geography and therefore also expense. All the kelp
10 producers who have started the organic transition in Alaska
11 have been working with Oregon Tilth, so that means that we're
12 flying someone up from the northwest.

13 And then if you're familiar at all with Alaska
14 geography, once you get there, you're then also flying around
15 to get out to Kodiak or down to southeast or different parts of
16 the state. And that just adds expense. And so for relatively
17 new farmers who have unsure markets, adding another expense is
18 definitely a barrier.

19 In terms of support mechanisms and infrastructure to
20 support that transition, the good news is that there is a lot
21 of that infrastructure in place right now. There's a lot of
22 attention in the state and a lot of federal dollars right now
23 supporting the growth of the seaweed mariculture industry. And
24 with that have come Sea Grant programs and other extension-like
25 programs that are helping with farmer training and with farmer

1 technical assistance.

2 And there are a lot of places for support for organic
3 to fit into if there is a choice for a further investment in
4 organic certification in the kelp realm.

5 And one of the things that was interesting going into
6 this, that there were two farms that were certified when we
7 started the assessment and a number of the people that I
8 interviewed, fellow farmers, said, ah, interested, backburner,
9 haven't thought about it very much. And within the next few
10 months of these ongoing conversations and dialogue, there were
11 seven of those people who came forward and said, I'm going to
12 do this. And so just the assessment itself spurred a lot of
13 interest. And so I think that we're going to see quite a trend
14 in the very small industry, but toward the organic
15 certification.

16 And that is a good segue to the second project, which
17 is going to the next slide. So as I said in the beginning, one
18 of the things we found early in this Alaska assessment was that
19 people were talking to colleagues in Maine and saying, huh,
20 yeah, I went through that organic process, and they were
21 finding a lot of commonalities. We were finding a lot of
22 commonalities. I was definitely one of those people.

23 And one of those commonalities was that the whole
24 process for certifying seaweed in the marine environment is
25 based on the land-based standard, right? And so there was a

1 lot of challenges for interpreting the land-based standard in
2 that marine environment.

3 But that's challenges both for the producer filling
4 out our organic systems plan, but also for the certifiers in
5 interpreting the land-based standard. And we found that it was
6 being done differently in the northeast and the Atlantic states
7 than it was here in the Pacific states, and that there was
8 really -- there was some concern on the part of people in the
9 kelp mariculture industry that, wow, if I invest in organic
10 certification, does this have integrity? Does it mean the same
11 thing in one place as it does in the other?

12 And so that birthed this project, this effort to
13 align how we're applying the land-based standard across the
14 U.S. And this has been a really very interesting multi-
15 stakeholder process, where we've brought together all of the
16 entities, all the certifiers working on seaweed certifications,
17 as well as the Organic Trade Association and Green Wave, which
18 is the national organization that supports kelp mariculture,
19 and in an attempt to come up with a set of unified standards,
20 -- sorry, unified guidelines under the standard.

21 And the first step of that was to say, where are the
22 biggest problems? Where are the biggest issues? And those we
23 have found lie under NOP 205-202, the land standard, and in
24 205-204, the seed and seedling standard, part of the standard.
25 And so this ongoing effort is to bring everyone to the same

1 table and to figure out how to all approach this in the same
2 way. Are we going to use standardized buffers? It's a marine
3 environment. How do you know how things are flowing and where
4 things are flowing? Are we going to take this on a case-by-
5 case basis?

6 The seed and seedling standard is an interesting one.
7 There are two producers of organic seedlings, and I use that
8 term in air quotes because it's an algae, it's a marine, it's
9 macroalgae, it's a different biological process for
10 reproduction. And there are two producers in Maine that are
11 successfully producing organic, but they're the only ones who
12 figured it out. And they're closely held industry procedures,
13 and it's not -- it hasn't been figured out by everyone.

14 So right now, we have mostly operators operating
15 under the exemption, but there's a lot of concern about how
16 that rolls forward and how do we get to a place in the country
17 where it's better understood how to produce organic seed.

18 So that's a whole lot of information about this kind
19 of involved process, but I think that the take-home message
20 from all of this is that we have in seaweed mariculture, we
21 have a new relatively nascent industry, and we have a real
22 opportunity to set the stage with organic certification.

23 Most of the process of growing kelp is organic by
24 nature. There are, except in the hatchery and nursery stage,
25 there are no inputs out on the water. It's a relatively easy

1 thing to apply, and yet there are opportunities. It's not the
2 way kelp mariculture or seaweed mariculture is done all around
3 the world. There are parts of the world where people are
4 dumping inputs into the marine environment. And so I think the
5 take-home message here in the U.S. is that we have an
6 opportunity to get organic certification to figure out how to
7 do it really well for seaweed, and that that can set the stage
8 for that entire industry going forward.

9 We want to encourage those virtue signaling
10 industries that are buying the kelp to want to have organic
11 certified kelp and to expect that from U.S. producers.

12 CHAIR SMITH: Chris and Ben, are you going to come
13 back up and help to facilitate Q&A? Is that the plan?

14 MR. BOWELL: Yeah, we have however much time we want
15 to spend.

16 CHAIR SMITH: I think we can do about 15 minutes or
17 so, if that's okay. Okay. So I always get super inspired
18 hearing these top panels going around the country. So thanks
19 for all of the work being done here in the Northwest. All the
20 projects sound super rewarding. And like I said, it's always
21 really inspiring. So with that, I'll open it up to the Board
22 for some questions.

23 Allison, go ahead.

24 BD. MEM. JOHNSON: Thank you so much. I'll echo the
25 feeling of inspiration. Having been one of the people who

1 helped pitch this idea to USDA originally, seeing it come to
2 life and be so successful is just a source of great joy and a
3 bright spot in the world. So thank you to the Northwest region
4 and all of you who are continuing to do this work.

5 I think I'm a target seaweed consumer, so grateful to
6 see that supply chain being built up. And I'm curious if there
7 are any other particular market opportunities that you see in
8 the Northwest and whether you're getting information from
9 retailers or other sources of information about where the
10 market opportunities are strongest.

11 MR. BOWELL: Just big picture market opportunities?
12 Yeah. And the kelp has been so interesting. I'll just throw
13 in my two cents. I don't know if everyone's familiar. Alaska
14 has maybe 18 operations certified organic, including crop and
15 handling. And so trying to get our heads around how to support
16 growth in Alaska has been challenging. So there's interest in
17 seaweed. There's rhodiola is another crop that can be exported
18 out of the state. And so that's where we see, I understand,
19 that's where we see the biggest appeal for organic
20 certification out of Alaska is things that move out of the
21 state. And so those have been instances.

22 I mean, I think that, yeah, there's just -- we just
23 have so many diversity of crops that make -- that really --
24 it's very specific. And so hazelnuts, there's been a lot of
25 conversation around that here in the state of Oregon. We

1 generally see kind of a saturation in the organic produce. And
2 so we're trying to figure out some of the other places. We
3 have spent a lot of time with the direct-to-consumer type of
4 producers that we heard a few from today because I do think
5 that there's opportunities in that space. You know, we've been
6 looking at every crop opportunity across the region. And so I
7 don't have a list of other ones that are popping to the top of
8 my mind. I don't know, Chris, if you want to add any others.

9 MR. SCHREINER: I would just echo Ben's comments.
10 Oregon produces over 200 different agricultural commodities.
11 And I think this gets to the -- I want to emphasize the
12 importance of the pinpointed market development in OTI because
13 there are spaces where there is saturation, and we don't want
14 to lead farmers to transition to where there are not markets
15 and market opportunities. I think the way we've been trying to
16 think about it is, you know, looking at what Oregon and
17 Oregon's climate and geography is like uniquely positioned to
18 produce. And hazelnuts has definitely risen to the top of that
19 list. And there's been some really great networks and
20 community building. And there's an organic hazelnut
21 association.

22 But apart from that, it's really being intentional.
23 And as I mentioned, that organic economic assessment, the
24 consultancy firm that was hired to do that economic assessment,
25 they candidly said, we have so little data at this point. And

1 I just want to emphasize the importance of good market data.
2 So it was great to hear the market news announcement. That's
3 really going to make a difference and ensure that people, when
4 they transition, they are transitioning to where there are real
5 opportunities.

6 CHAIR SMITH: Nate?

7 SECRETARY LEWIS: I have a question, I think, for
8 everyone on the panel. And to whatever extent anyone wants to
9 chime in, but land access is not a problem unique to organic
10 producers. So I'm curious kind of how TOPP in the Northwest is
11 looking at land access, whether that's conservation work or
12 long-term leases or, you know, how does that fit into this
13 puzzle of mentorship and bringing folks onto -- into the
14 organic marketplace?

15 MR. BOWELL: Yeah, that's a great question. Nate, I
16 would say that it's not been an area of our particular
17 specialization or expertise, right? And so we've been trying
18 to partner with other organizations that are kind of like folks
19 from Montana that work with beginning farmers and have more of
20 an eye on some of that topic area. And so I think a lot of it
21 is through the partnerships that we've been able to develop and
22 continue to look for other opportunities to develop that.

23 Beginning farmers, I think, is a really interesting
24 example and thing to talk through because obtaining organic
25 certification is just one of like a thousand challenges that

1 they face. And so that's been a thing that we've thought
2 through a lot with TOPP. It's like those producers need so
3 much support and like where is TOPP best equipped to support
4 them and where are we best able to partner with other
5 organizations that can leverage their expertise and try to
6 bring all of those pieces together to help the producer out as
7 much as possible. That's sort of how I think about it, I
8 guess.

9 MR. SCHREINER: Yeah, I'll just chime in. It's
10 really the notion that, you know, we can't solve big problems
11 individually and we're going to accomplish a lot more together.
12 So here in Oregon there are other NGOs, non-profits that have
13 really taken on the land access, land succession as it relates
14 to ag land, you know, head on.

15 There's Friends and Family Farmers. They've got an
16 Oregon Land Link program. We heard from a farmer and part-time
17 staff yesterday at the National Organic Coalition Farmer Panel
18 about that program. And then there's another organization, the
19 Organic Agricultural Trust, OAT. And they do a lot of education
20 just about succession planning in ag families because a lot of
21 times those older generations that are wanting to retire, their
22 equity, their retirement is bound up in the value of the land.

23 So how do you figure that out if you've got a next
24 generation that wants to continue working on a farm but then
25 the existing generation looking to retire but has equity and

1 retirement bound up in land.

2 So, yeah, just finding the right partners and
3 figuring out what are our strengths and how do we leverage each
4 of our complementary strengths to achieve common goals.

5 MR. BOWELL: And I can see Grace and Griffin because
6 I know they're new to land access. I don't know if you all
7 want to comment on anything about land access. Feel free. If
8 not, that's okay too.

9 Come on up. Come on up.

10 MS. LEMLEY: I think in our experience, we're going
11 through that right now, where it's like we are on leased land
12 through a program that has helped us get land access for a
13 period of time, right? It's not infinite that we can stay on
14 this place.

15 And so Viva Farms, part of what they do is kind of
16 help you transition out of Viva and work with other folks who
17 are working in the land access field. So in our experience so
18 far there are lots of groups of people that are doing that. So
19 far, nothing yet for us. But I think it will come. So I guess
20 the answer to the question is yes, we feel like there are
21 those, but there's not a lot of like success stories yet.

22 CHAIR SMITH: So was that yes? Okay.

23 Amy?

24 VICE CHAIR BRUCH: Thanks, Kyla.

25 My question is for Chris and Ben again. Thank you so

1 much, Grace and Griffin. That was just tremendous. It's so
2 exciting to hear these successful farmer stories and recruiting
3 more members into our community.

4 You mentioned market saturation. That kind of got my
5 wheels turning and thinking about prior conversations we've
6 had, maybe the need for a TOPP 2, looking at let's get the
7 producers in in TOPP 1, let's retain them and TOPP 2.

8 Another thought I do have that I'd like for you to
9 comment on is what Dr. Tucker said in her presentation. She
10 highlighted some of the products that we're receiving based on
11 import certificates, and a lot of them look like products that
12 the Northwest region can grow. So can you unpackage the future
13 for domestic production and how we can grow acres in our
14 communities and understand the realities of the globalness of
15 our program?

16 MR. SCHREINER: That's an easy one, Amy.

17 Let's see where to start on that one. I would say,
18 first and foremost, that in terms of market opportunities,
19 there's -- let's see. I had a thought and then I lost it.

20 Yeah. So, first and foremost, I think it's -- when
21 you talk about -- there's certain crops that we saw on that
22 list but they're - and they're produced here in the U.S. Why
23 not more organic? I think part of that is the reality that
24 this is a global market and cost of labor, cost of land,
25 regulatory, not NOP regulatory but other regulations that have

1 effects on prices. And so that's -- those are very real
2 challenges that all of U.S. agriculture faces, not just
3 organic, in terms of competition with imports. So that is a
4 big challenge.

5 The thought that I wanted to lead on was your idea
6 about top two. And so in my opening remarks, I talked about
7 how historic this \$300 million initiative, organic transition
8 initiative is, but the reality is this is just the beginning.
9 And we're going to accomplish a lot in five years, but if
10 that's it and we don't have a continuation of these investments
11 and these programs and these policies, then I think in terms of
12 realizing that missed opportunity for domestic organic acreage
13 and markets to respond to unmet needs that are being filled by
14 imports from other countries, we're not going to realize that
15 full potential of that opportunity. And I think that's going
16 to be really key. We're going to really have to advocate for
17 those programs.

18 As 26 years in the organic sector and organic
19 certification, it uses the market as a lever for change, as
20 incentives for changing practices. And it's been a powerful
21 force for change, but 25 years later, we're still a pretty
22 small percentage of the acreage. And I've really come to
23 really appreciate in the last decade or so that the market
24 lever is one lever, but policy and programs and investment is
25 really the other lever of change. And I would invite all our

1 organic colleagues and advocates in the broader movement to
2 really lean into the policy and advocacy space because those
3 are where real change and lasting change I think have the
4 greatest opportunity.

5 CHAIR SMITH: Took a minute to collect your thoughts,
6 but then you got to clap. So, Dilip.

7 BD. MEM. NANDWANI: Thanks, Kyla.

8 First, I'd like to thank you for your excellent
9 presentation from you and from your team. My question, it's an
10 easy one, okay, it's on seaweed. You know, you're already
11 aware of that. The U.S. market for seaweed production is
12 almost 0.01 percent, which is very, very less compared to, you
13 know, the world market we have.

14 The second part I wanted to mention that about the
15 harvesting seaweeds around the world, in Japan, Korea,
16 Argentina, Iceland, these companies, their harvesting method of
17 seaweeds, as far as I have done the review of literature and
18 since working on these two sunsets, my permission says that
19 they have the environmental concern. They use the equipment
20 and the boat goes and they dig the ocean floor, which is not a
21 sustainable way, and there are from stakeholders and the public
22 comments also they have raised this concern.

23 What I heard from your presentation looks like this
24 method here is very natural and very sustainable, and that's a
25 scene that is very, I'm very happy to see that one. So I guess

1 the question is what else can you tell about how you can
2 increase, you know, how do you see the U.S., the domestic
3 production of the barriers? Is it the organic certification?

4 One of the, I'm still not sure whether we have the
5 organic standards for the sea kelp in U.S. or we already have
6 and companies are certifying. So whatever information you want
7 to share that we have these standards, how we can be more
8 sustainable, how we can increase this production, whatever
9 additional information you want to share would be great. Thank
10 you.

11 MR. BOWELL: Yes, thank you. And I can just say real
12 briefly, and I would invite Evie to come back up. Obviously,
13 she has much more expertise than I do, but I think that is one
14 of the things that's come out of it is I think it would be
15 beneficial if there were some more specific standards to apply
16 to this unique situation. And so I think that that could be
17 helpful.

18 And there is, like you said, there's not a lot of it
19 happening right now. The reason we started looking at it is
20 like, again, Alaska, what else are we -- like there's a lot of
21 opportunity for growing that product up there and so thinking
22 about the demand for organic certification.

23 So I don't know if you have anything to add, but I'll
24 invite Evie to answer.

25 MR. SCHREINER: Yeah, I was definitely going to

1 invite Evie as the expert here on the topic. For me, I think
2 what Evie said today was that virtue signaling. So as you're
3 illustrating, in other areas where there's production, that
4 production may be doing more harm to the environment. And so
5 if there are better practices that, you know, align with
6 organic principles of working with nature and maintaining or
7 enhancing conservation, how can we incorporate those best
8 practices into the organic system, the organic standard, and
9 recognize those producers that are doing it the best way
10 possible for people and the planet.

11 And leave it to -- if Evie has anything else. Yeah.

12 MS. WITTEN: Yeah, thank you. I appreciate. That's
13 a really excellent question and framing. So I think there's a
14 couple of distinctions to make.

15 First, I'm referring to and looking at farm-grown
16 seaweed as opposed to wild-harvested seaweed. And so -- and
17 there's both happening in the U.S., wild-harvest and farm-
18 growing. And I would say in the U.S., for the most part, we
19 have a pretty good handle on the wild-harvest. Wild-harvesting
20 seaweed, harvested seaweed has been, was the first to be
21 organic certified. And we are trying to fit the current
22 practices. Well, first, the land-based standard has been tried
23 to be fit to wild-harvest was the first step. And then in the
24 last five to ten years, mostly in the last five years, we've
25 tried to fit that not very smooth fit of the wild-harvest to

1 farm-grown.

2 And so we have a situation right now where the farm-
3 grown seaweed in the U.S. is grown very responsibly. It's
4 grown at a scale and using methods that are easy to certify
5 organic because the practices are already organic.

6 That's not the case throughout the world. Part of
7 what's going on in the U.S. is that we're growing brown
8 seaweeds. The type of seaweed and how you cultivate it varies.

9 And so in some other parts of the world, especially in Asia,
10 some of the seaweeds that people are growing in a farm setting,
11 both due to the different species and also due to the different
12 scale and cultivation processes, those are not organic and
13 would be difficult to certify. So they can be damaging to the
14 environment, not as a blanket statement, but there are
15 different practices.

16 What we're finding here is this national alignment
17 project that we're in the middle of right now really is an
18 attempt to say, okay, given what we have to work with at the
19 moment, how do we come up with this common set of protocols,
20 guidelines that all the certifiers are going to use to certify
21 seaweed operations? It's clunky. And what we're hearing from
22 the seaweed industry is we really need a standalone standard.
23 We should be looking at it like mushrooms or pet food or one of
24 the other maple syrup production, one of the other non-
25 traditional modes of production, because it is so different to

1 grow a macroalgae in a marine environment.

2 So thank you. I t's a good opportunity to clarify
3 some of that, but I think that's probably where it needs to
4 move. I think we are making progress in this national
5 alignment process, but it's still at the end of the day going
6 to be clunky. We're trying to put a round peg in a square
7 hole. Does that answer your question?

8 BD. MEM. NANDWANI: Yes. Thank you very much. And I
9 look forward to seeing maybe after three years what's the
10 outcome coming from these projects. Thank you.

11 MS. WITTEN: Good. Thank you.

12 CHAIR SMITH: Not yet. I was going to say the last.
13 Well, is this a follow-up for Evie?

14 Brian, can he skip ahead of you? Okay.

15 BD. MEM. D'AMORE: It isn't frequently in what we do
16 that we have a position of actually talking about improving the
17 environment continuously, and I haven't heard anything today
18 about the benefits of the production of seaweed in terms of
19 oxygenation, erosion control, et cetera.

20 MS. WITTEN: Right. Okay. So the benefits of
21 seaweed mariculture are -- well, first of all, seaweed pulls
22 carbon dioxide out of the ocean water. Right? So it is well
23 demonstrated to ameliorate acidification in the vicinity of the
24 operation.

25 There has been a lot of work in the science community

1 on the carbon sequestration power of -- the longer-term power,
2 and that all depends on what you do with the seaweed once
3 harvested. Right?

4 And so I would say scientifically the jury is out on
5 -- there's a -- you may be familiar, there's a lot of interest
6 in growing seaweed in a farm setting to sink it as a carbon
7 sink, as a climate play. Right?

8 I think it's more important to focus on the fact that
9 we can grow an incredible amount of biomass that's high-
10 protein, nutritious biomass for human, plant, and animal food.
11 And I think it's those areas where the benefits really come in
12 with seaweed, and that we can -- I'll focus on plant
13 biostimulants as one example, where we can grow something in
14 the marine environment that pulls out the nutrients and the
15 macro and micronutrients from the marine environment and put
16 that in the land-based agricultural system and really move the
17 needle on soil health.

18 And you're growing that input with zero fresh waters,
19 zero inputs. And so the inputs, the footprint of that product,
20 of that plant biostimulant, really is just in the planting and
21 harvesting and processing mechanisms. Same with animal foods.

22 CHAIR SMITH: Brian?

23 BD. MEM. CALDWELL: Thanks, Kyla.

24 I have a question for the blueberry grower. I'm
25 sorry I didn't write down your name, but I'm just wondering

1 whether the transition process has helped with the marketing at
2 all. Whether -- and what you see in the future for marketing,
3 whether it's just more consumers or a better price.

4 MS. THOMPSON: Yeah, I think it'll be a lot of the
5 same consumers. We have a really strong customer base. So I
6 think the same plus additional ones that are specifically
7 seeking an organic product.

8 So I think for -- yeah, just for the case of our
9 small little farm, it's, yeah, very, I don't know, very like
10 localized. Like it's, you know, the repeat customers that have
11 been coming for 20 years. And then I think additional ones
12 that are specifically seeking out organic berries. I think I'm
13 missing something. Did I forget?

14 BD. MEM. CALDWELL: That's great. And any price
15 advantage at all?

16 MS. THOMPSON: Oh, yeah. So, I mean, I will raise the
17 prices some. Haven't thought like specifically, but I mean,
18 yeah, it's a more, you know, there's more cost to producing
19 that product. So it makes sense that the price will be higher.
20 Yeah, I'm not really sure how it'll shake out as far as, you
21 know, profitability or, like, I think I'd have to like, you
22 know, mess with some numbers and kind of see how it goes.

23 But, yeah, as far as -- yeah, I mean, it was more the
24 transition is more not so much profit driven as like, you know,
25 outlook and just kind of what I wanted to do. I mean, I don't

1 think it will -- yeah, I guess I guess we'll see how it shakes
2 out, to be honest.

3 BD. MEM. CALDWELL: Great. Yeah, thank you.

4 CHAIR SMITH: Franklin. Oh, sorry, Franklin. You go
5 ahead.

6 Can you come back to the -- yeah. Can you remind us
7 of your name, by the way?

8 MS. THOMPSON: Erica Thompson.

9 CHAIR SMITH: Thank you. Nate?

10 BD. MEM. POWELL-PALM: Erica, I was wondering if you
11 could speak to whether or not the storytelling that you do
12 around your product has gotten easier when you're able to point
13 to the standards and the seal rather than list out a thousand
14 different terms describing your practices. I'm putting words
15 in your mouth. But I would love -- I would love if you could
16 speak to that a little bit about your marketing and if it's an
17 advantage.

18 MS. THOMPSON: Yeah, for sure. I mean, so right now
19 I'm not even certified transitional. So, yeah, I'm one year
20 into the process. So, yeah, I don't have a seal yet, but
21 definitely looking forward to that. I mean, right now, you
22 know, it's a lot of -- like you're saying, like lots of back
23 and forth and questions with customers. You know, have a
24 little like sign like, you know, we, you know, we use organic
25 practices. We're a year into the process of being certified

1 organic. So there's that. But, you know, it's not like widely
2 recognizable. You have to really like zoom in on it.

3 So I think and also like just, you know, working with
4 my employees that also interact with customers and kind of, you
5 know, getting the like, you know, elevator one -- one sentence
6 elevator pitch of like, you know what, what the deal is. So,
7 yeah, very much looking forward to getting to that point and
8 having that seal and it'll just be, you know, right there and
9 people will see it and know what it means. So yeah.

10 BD. MEM. POWELL-PALM: Awesome. Thank you.

11 CHAIR SMITH: Franklin.

12 BD. MEM. QUARCOO: This is about the seaweed
13 discussion we had earlier. I've been wondering about -- there
14 was a distinction made about marine -- the farm grown seaweed
15 and then the wild harvested. I'm wondering about the kind of
16 control that seaweed farmers have given the fact that it's a
17 marine environment.

18 We're talking about something that does
19 bioremediation. So it's not only carbon dioxide that is being
20 removed by heavy metals and stuff like that. How does a farmer
21 control an environment like the marine environment that you
22 don't typically have a lot of control over?

23 MS WITTEN: Another really excellent question. And
24 it's really the biggest question that this group, this national
25 group, is wrestling with. The certifiers that are working on

1 certification for seaweed operations, you know, getting
2 together and saying, how do we apply? We have this standard
3 developed for land. How do we apply it in the marine
4 environment?

5 And I think -- and also, how does the law -- how does
6 how does -- yeah -- how does land law apply? Essentially, that
7 is a seaweed farmer. In terms of the control you have, it's
8 very little. I have a permit. And this is true around the
9 United States for all states. But in Alaska, I went and I
10 worked with several state agencies, several year-long process
11 to get a permit to grow seaweed in a specific area. But that's
12 all I have is the right to grow. I don't have the right to
13 keep anyone else off of that patch of ocean or anything like
14 that.

15 So in terms of land law, it's very different to
16 control access. And that's one of the issues that we're
17 wrestling with. On the other hand, these are areas that are
18 the permitting project -- the permitting process is quite
19 stringent. Farms are only being cited in areas that are away
20 from point sources of pollution and all this kind of thing.
21 Another reason why it makes it relatively easy to become
22 certified organic. But we don't have that control there.

23 On the other hand, it's -- I'm not sure how different
24 -- this is part of the dialogue. Farmers on land don't have
25 control over the air or over the groundwater or those kinds of

1 parts of their growing environment either. So what is the key
2 difference? And I think it really boils down to water movement
3 and flow and maintaining exclusive access. And in terms of who
4 can go on that farm or not.

5 I don't know if I'm really addressing your question
6 other than to say it's an excellent question. It's one of the
7 ones that we're wrestling with. Right?

8 CHAIR SMITH: The last question will --

9 BD. MEM. QUARCOO: Thank you.

10 CHAIR SMITH: Sorry. Yeah. The last question will
11 be from Allison.

12 BD. MEM. JOHNSON: Thank you. Back to Ben and Chris.

13 Oregon has been such a leader on organic technical
14 assistance and especially your collaboration with NRCS. And it
15 was clear from the presentations how important that hands on,
16 knowledgeable, tailored TA is. So I'm wondering if you could
17 speak to your experience in collaborating with NRCS and what
18 lessons we can take across the country from that.

19 MR. SCHREINER: Thanks for the question, Allison.
20 So, yeah, the NRCS partnership, like I said, it dates back to
21 2010. And how it began was building relationships. I started
22 attending the state technical advisory committee meetings for
23 NRCS. Sitting in those meetings, listening to representatives
24 from the agencies and other partner organizations at the state,
25 really just trying to understand that universe. And that takes

1 time. Like all the acronyms, all the programs, like what,
2 understanding what are their priorities, how do they measure
3 success. And then also getting to know the individuals in that
4 room and identifying NRCS staff that seemed interested to talk
5 to the organic guy in the room.

6 And from there, you know, we got a Western SARE
7 project, did some cross training between organic certification
8 inspectors and conservation planners to just kind of compare
9 what do you do? How do you work with farmers? But, hey, we
10 share a lot of common goals when it comes to soil health,
11 biodiversity, clean water, all the things that are related to
12 conservation.

13 And, you know, over time it was just building
14 relationships, showing up at the table, and then when there's
15 opportunities. And opportunities, you never really know when
16 they're going to show up. It's kind of this combination of the
17 right time, the right, you know, administrators and investment
18 being available. And seizing those opportunities. But then once
19 we're there, it's also just being a good partner, listening,
20 understanding what is their universe? How do they work? How
21 does that compare with what we do? And figuring out how we can
22 move forward together.

23 And Ben served as our national organic specialist for
24 NRCS for many years. And Ben, I'd welcome you to share any
25 lessons learned from that partnership.

1 MR. BOWELL: Yeah, thanks. I think one thing that
2 was really helpful is, like, we had a position within the
3 agency and learned a lot about the agency. And then tried to
4 better understand and see the opportunities or where their
5 program delivery or assistance just needed to be tweaked a
6 little bit, and then worked really internally to try to provide
7 training and technical resources and stuff that was really
8 relevant to NRCS. And so kind of really tailoring the way that
9 we work with them.

10 And I know we have an NRCS guest tomorrow. And so
11 I'm really thankful that the Board has invited Amanda and gets
12 a chance to listen to that. We're really excited with this new
13 expanded agreement, national agreement with NRCS, where we've
14 had one position nationally. There's now six positions
15 nationally in partnership with CCOF, MarbleSeed, and OATS OTA.
16 So we're just really thankful for that increased capacity to
17 work within NRCS and do more of that training.

18 And I think there's just a lot of opportunity for,
19 like, translation between the organic world and the NRCS world,
20 because there's a real natural alignment and there's a lot of
21 good opportunity. But sometimes we're all just, like, kind of
22 speaking in a different way but talking about the same things.
23 And so a lot of what we talk about is just, like, they mean
24 this. You mean this. And so then just trying to help better
25 communicate, help producers to understand the opportunity there

1 and how to kind of navigate those programs, because it is a big
2 bureaucracy and it's dispersed. And so you kind of have to
3 figure out how to speak NRCS a little bit. And we hope that
4 NRCS can speak a little more organic, I hope.

5 MR. SCHREINER: And I'll just elevate Ben's comment
6 on the critical importance of having these positions embedded
7 within the agency. Because NRCS works with all kinds of
8 partners, but not that many that have these shared positions.
9 And just the difference of that staff person having an NRCS
10 email account and showing up at NRCS internal meetings, that
11 makes all the difference in terms of just receptivity to what
12 they have to say. And it also, as Ben said, like, really gives
13 us a solid grounding in that environment and understanding how
14 to best achieve what we're hoping to accomplish within that
15 system.

16 CHAIR SMITH: Okay. Well, we have concluded the
17 morning session. Thanks again, Northwest TOPP, for number one,
18 all the great work that you're doing; and number two, for
19 shifting around your schedule to accommodate our schedule. So
20 thanks again for that.

21 We are, yeah, going to hit lunch. When we come back
22 at 2:00 Pacific, that's when we're coming back, we're going to
23 get into some public comments.

24 So we're starting with Johanna Phillips, 2:00 p.m.

25 (Recessed at 12:36 p.m.; to reconvene at 2:02 p.m.)

1 CHAIR SMITH: We now have quorum. So we're going to
2 get started with public comments. Hopefully everybody had a
3 wonderful lunch and got some time to connect with some
4 colleagues. If you didn't get enough to eat or get hungry
5 later this afternoon, Organically Grown Company provided some
6 snacks at the back. So thanks, Organically Grown Company. And
7 we're going to get started with public comments.

8 Michelle, am I supposed to read all the public
9 comment stuff? Oh, I can. Okay.

10 So we have a policy in our policies and procedures
11 manual. All persons wishing to comment at the NOSB meeting
12 signed up in advance per the instructions. I will call on
13 persons according to the posted schedule.

14 Persons must give their full names and affiliation
15 for the record. Proxy speakers are not permitted. Individuals
16 providing public comments shall refrain from making any
17 personal attacks or remarks that might malign the character of
18 any individual entity or organization. Members of the public,
19 when they come to the podium, are asked to clearly and
20 succinctly say the issues that they wish to present before the
21 Board so that we can have a comprehensible understanding of the
22 speaker's concerns.

23 And so first up -- oh, sorry, Michelle. Yes.

24 Thanks. It's less intimidating in person. Okay. So
25 up first, we -- oh, sorry. Do we have an on-deck chair? Okay.

1 Michelle is going to get an on-deck chair. So on
2 deck is Gwendolyn Wyard, and after Gwendolyn is Mike Menes, and
3 up first is Johanna Phillips.

4 Name and affiliation, and you can get started.

5 MS. PHILLIPS: Okay. Good afternoon, NOSB members.
6 Thank you for your service and for the opportunity to provide
7 comments today.

8 I'm Johanna Phillips, Director of Business
9 Development and Technical Affairs at Strengthening Organic
10 Systems, LLC. SOS submitted written comments on several
11 topics, including residue testing, risk-based certification,
12 seed, and National List Sunset materials.

13 Our written comments provide additional detail, and
14 my incredible colleagues Kim and Gwendolyn are also providing
15 comments today.

16 It was a privilege to share the stage with experts in
17 seed during the National Organic Coalition meeting yesterday.
18 We underscore the urgent need for improved oversight of
19 commercial availability, particularly in seed usage. An
20 enhancement to the organic integrity database by adding a new
21 category for current organic seed suppliers certified by USDA
22 National Organic Program is a simple yet effective update that
23 would facilitate real-time access to seed supplier data,
24 bolstering organic seed use, and supporting the future of the
25 U.S. market.

1 This solution, when paired with focused certification
2 attention on a systematic basis, will support increased organic
3 seed usage, critical to the future of the U.S. market. Risk-
4 based certification is a critical tool for successful
5 enforcement. Attempting to hit every point in every compliance
6 activity is time-consuming, less effective, and burdensome.

7 And attempting to do so typically results in narrowly focused
8 results with an element of luck to catch fraud.

9 Risk-based certification must be implemented
10 thoughtfully, consistently, and with a plan to achieve
11 comprehensive fraud prevention outcomes. We've proposed a
12 decision tree that supplies an example of how a certifier might
13 prioritize specific requirements, including cyclical adjustment
14 to level up compliance in lower-risk activities so they aren't
15 overlooked.

16 With the offered farm operation example, we proposed
17 examples of higher and lower-risk activities with a developed
18 schedule for prioritization. Thinking of one business's
19 comments during the comment period about being surprised in
20 late season with animal identification requirements, these risk
21 priorities can also be used to put operations on preparation
22 notice early in the certification cycle, allowing
23 prioritization of specific requirements more thoughtfully and
24 avoiding the feeling of gotcha or surprise.

25 Additionally, I'm posing a statement that increasing

1 transparency in risk and compliance decisions to the public
2 will support effective deterrence to fraud. Residue testing
3 links closely to risk-based certification. Today's testing
4 approach needs to be improved, including training, decisions,
5 resources to support certifier enforcement, and operation
6 awareness. Fraud deterrence starts with comprehensive tools so
7 that cheating is deterred. People are less likely to commit
8 fraud when they know it will be checked.

9 Today, the NOP profile focuses too narrowly and
10 limits enforcement tools to deter fraud adequately. Thank you
11 for your time, and I'm happy to respond to questions.

12 CHAIR SMITH: Thanks, Johanna.

13 Questions from the Board: Go ahead, Amy.

14 VICE CHAIR BRUCH: Thank you, Kyla.

15 Johanna, thank you for opening up public comments
16 today for us. Appreciate it. Welcome back, everybody, from
17 lunch.

18 In a previous comment, I believe it was last
19 semester, you mentioned where instruction is not clear,
20 enforcement activities may become less prevalent, including
21 sampling, despite risk being present. Can you unpackage more
22 your recommendations about known intentional application and
23 what is needed to exclude from organic sale? You mentioned
24 205, 671, that that might be misinterpreted amongst members of
25 the community.

1 MS. PHILLIPS: Well, I think -- I'm just trying to
2 put myself back in the frame of the original comment. But the
3 comment was related to where instruction is unclear, what you
4 can end up with is a scenario where either businesses are
5 unfairly impacted by an evaluation. So, for example, in some
6 areas, there's a concentration factor concern with dried down
7 products, such as herbs. And because of the way the
8 instruction is written today, certifiers are obligated to
9 utilize the EPA tolerance or FDA tolerance. And just these
10 instructions need to be modernized.

11 And what ends up happening sometimes is if certifiers
12 feel like they can't fairly apply the requirements, they may be
13 selective about pulling samples of that type, not that they
14 would not do enforcement activities if they had a concern. So
15 I want to make sure it's clear. Like, certifiers are pulling
16 samples when they have concerns. But when you're talking about
17 routine testing, it's logical that they wouldn't pull samples
18 in areas that are going to be time consuming without, like,
19 really a logical outcome. Is that helpful?

20 VICE CHAIR BRUCH: Yeah, that's helpful. Can you
21 also touch on -- sorry, I had multiple parts to that question.
22 Your recommendation in the current public comment process about
23 we need more clarification for 205-671, which is exclusion from
24 organic sale, that it might be misinterpreted if a certifier
25 sees a direct application of a pesticide in a field, but later

1 on maybe that grain might not test for that substance.

2 MS. PHILLIPS: So I'll just say very, very clearly,
3 the rule is very clear that an application of prohibited
4 materials would exclude a product from the organic marketplace.
5 I don't think that that should be contested.

6 What the comment speaks to is that there's a
7 conversation point where that isn't always how that approach is
8 applied, that sometimes certifiers will say, oh, we observed or
9 we know there was an application and then they'll pull testing
10 and it's possible that the interpretation could be applied,
11 that the 5 percent EPA tolerance is really the threshold.

12 However, that instruction does very clearly say if
13 there was an application, that that product should be excluded
14 from sale.

15 VICE CHAIR BRUCH: Thank you.

16 CHAIR SMITH: I'm going to call on myself. Thanks
17 for your comments on risk-based certification. Some other
18 commenters had talked about using EU as a model, and I know
19 that in your previous role, you have some experience with the
20 EU scheme, and so I wondered if you have thoughts on that and
21 what we could learn from their system and how it can
22 incorporate into the NOP scheme, because they're different, but
23 what can we learn and what can we do better?

24 MS. PHILLIPS: Yeah, I think -- you know, I'm not as
25 familiar with the EU requirements as I am with the U.S.

1 requirements, but I definitely was introduced to risk-based
2 certification through my previous employer, EcoCert. EcoCert
3 is the largest global organic certifying agent. They have
4 80,000 clients globally, and the majority of them are EU
5 operations.

6 The EU has more stringent standards in different
7 areas than the USDA National Organic Program, but what my
8 colleagues did introduce was this concept of risk-based
9 certification, because -- and I really thought the concept when
10 we were having those discussions internally, because we're kind
11 of geared in the certification space to try to check all the
12 boxes and make sure everything has been comprehensively
13 reviewed.

14 However, I've been convinced that the reality is that
15 what ends up happening is that you check a lot of boxes, but
16 not really the important ones, because certifiers and people
17 who are doing activities, they'll default to where their
18 comfort zone is or where their knowledge area is, and I really
19 think that the idea of risk-based certification speaks to, you
20 evaluate that business in the full context of the supply chain,
21 and you really focus on the areas where there is real risk for
22 that business.

23 And so speaking from the EU model, there's no system
24 that's perfect, right? And a one-size-fits-all approach to
25 certification is probably not going to be successful, because

1 in a risk-based model, domestic certifiers have different risk
2 than international certifiers, but taking the same approach to
3 figuring out what risk looks like and kind of a systematic
4 process, I think, is something we could definitely achieve
5 there.

6 CHAIR SMITH: Thanks, Johanna.

7 Up next is Gwendolyn Wyard. On the on-deck chair,
8 Mike Menes, and then it's Ramy Colfer.

9 Gwendolyn, name and affiliation, and then you can get
10 started.

11 MS. WYARD: All right. Good afternoon, NOSB, NOP,
12 and all of the fine people of the gallery. My name is
13 Gwendolyn Wired, and I'm speaking today as a founding partner
14 of Strengthening Organic Systems, an advising firm that does
15 just as what our name states.

16 First, welcome to Oregon. I've lived in this
17 wonderfully green and luscious state for almost 30 years, and I
18 hope that everyone can take a little time to get outside and go
19 for a hike and enjoy the ecological diversity of our amazing
20 surroundings.

21 Second, Mindy, Nate, Kim, Wood, and Jerry, thank you
22 so very much for showing up, for your service on the Board, and
23 for your commitment to keeping organics strong. You have our
24 written comment, so I'll be brief. I'm going to focus on take-
25 home messages for residue testing, organic seed usage, organic

1 pullulan, and if I have time, I might touch on L-malic acid.

2 Residue testing. We're very, very supportive of this
3 work. It's a high priority, and we urge the Board to deliver a
4 proposal for updated instruction to NOP in spring of 2025.
5 Time is of the essence. The organic sector has an opportunity
6 to better utilize testing as a tool to help detect and deter
7 organic fraud and support SOE.

8 The risk-based application of testing is valuable for
9 businesses wanting to protect their brand, and it's valuable to
10 the organic sector as a whole because it sends a serious
11 message to the fraudster that they will get caught. It reduces
12 the fraud opportunity, and this is Criminology 101.

13 SOS strongly agrees with the need to prioritize
14 updated NOP instruction that helps overcome challenges related
15 to unintentional contamination, uric and drift, and positive
16 residue detection for crops without tolerance levels.

17 Organic seed usage, our position is that a regulatory
18 change is needed, as recommended by NOSB in 2018, and increased
19 oversight of organic seed usage is a top priority for the
20 organic sector. Codifying continuous improvement into the
21 organic seed use regulation lays the regulatory framework, and
22 it sets the goalpost for all of the following steps that we're
23 talking about that are needed to build a strong, resilient, and
24 diverse organic seed sector.

25 In our written comments, you'll find a timeline,

1 detailed history leading up to the 2018 recommendation, and
2 more recently to NOP's 2022 priority rulemaking process, all of
3 which illustrates a strong record of support. We urge NOSB to
4 recommend that NOP move the 2018 recommendation to the Unified
5 Agenda without delay.

6 Pullulan, keep it on the list because it's non-
7 agricultural with a made-with label restriction. Yes, organic
8 is available, and I think a lot of it, and many companies are
9 using it, and the intent was to remove pullulan when it became
10 organic available, commercially available. However, we
11 arguably need more organic manufacturers in the supply chain
12 competition, and we have a regulatory irregularity as it
13 relates to classification materials, fermentation byproducts
14 specifically, and we think we probably need to look at that and
15 address the classification issues before pullulan is removed.
16 I know that's a little cryptic, but with that, I'm going to
17 stop, and I will answer any questions you have, because I think
18 I'm out of time.

19 CHAIR SMITH Right at the buzzer. You're the current
20 winner for buzzer queen.

21 Nate?

22 SECRETARY LEWIS: I'll take the bait. So you had
23 said you might have some comments on L-malic. I did have a
24 couple questions. One is sort of just what your opinion is of
25 the classification motion and listing motion as it was

1 proposed; and then second, whether or not classifying the two-
2 step process of L-malic acid as synthetic and adding it to the
3 national list at 605(b) would set any precedent related to the
4 review of excluded methods in that process.

5 MS. WYARD: Okay, well, I was going to touch on the
6 classification motion. The second question is a doozy. I'm
7 going to try to take both of them.

8 Oddly enough, we did not comment on L-malic acid, but
9 I woke up Saturday morning thinking about it. Invite me to all
10 your parties. I'm a fun date. And I think there's a technical
11 correction that needs to be made, because the classification
12 motion states that the synthetic form is fermentation of
13 fumaric acid.

14 And in the discussion document or the proposal
15 itself, it clearly states that there's this two-step process.
16 One step, one form is the non-synthetic, and that is microbial
17 fermentation of a carbohydrate substrate. That's the
18 fermentation. That's the first step. And the second step,
19 then, is enzymatic conversion of fumaric acid to L-malic.
20 That's the non-synthetic form, and it's really a fermentation
21 process.

22 The synthetic form is a synthetic form of fumaric
23 acid that is enzymatically converted to L-malic acid. So --
24 and it states that right there in the proposal. I just think
25 that it's easy to think of fermentation and enzymatic

1 conversion as sort of one and the same. Enzymatic conversion
2 happens as a part of fermentation, but you can't say what's
3 happening there with enzymatic conversion going from the
4 fumaric acid to L-malic is fermentation, because it doesn't
5 involve a microorganism and the Krebs cycle, which is what's,
6 you know, pumping out that L-malic in the natural form.

7 So I think just being real clear as everybody's
8 trying to figure out fermentation and the processes, and then
9 I'll crosswalk to the next question in terms of where excluded
10 methods come into play. It's important to understand these
11 processes, these biological processes, because you want to know
12 where to ask the questions about where excluded methods might
13 be utilized.

14 So the question is if we put the synthetic form of L-
15 malic acid on 605(b), and I agree with that. We should do that
16 with that change to the classification motion. I don't think
17 it would set any precedent for, like, letting GMOs in. Is that
18 sort of the concern? Is that? No, because the same questions
19 would be asked. Certifiers are doing the review of whether or
20 not genetic engineering is being applied to the materials on
21 the national list. And so, the same questions that they would
22 be asking for the non-synthetic form would be the same
23 questions they would be asking for the synthetic. Is there a
24 microorganism being used? Is it genetically modified? Is
25 there an enzyme being used? Is it genetically modified? Is

1 there a carbohydrate substrate? What is that carbohydrate
2 substrate? Molasses, corn? You know, could it be a GMO
3 substrate?

4 I -- actually, to be honest, I think that there's
5 more -- the application of genetic engineering would be applied
6 to the non-synthetic form before the synthetic form, if you
7 want to kind of put your head around that, because of the
8 fermentation process. There's a synthetic source for the
9 synthetic form.

10 So I think you have to ask the question for each
11 listing and understand where the genetic engineering would take
12 place. How about that?

13 CHAIR SMITH: I have a question from Dilip.

14 BD. MEM. NANDWANI: Very quick. Thanks for your
15 comment, and I always appreciate your insight. Very quick
16 about this organic pullulan. What's the status? Can you tell
17 us a little bit more about what's holding? When can
18 stakeholders can expect this organic pullulan? Thank you.

19 MS. WYARD: So there is a manufacturer of organic
20 pullulan. The manufacturing is taking place in China, and it's
21 being sold in the U.S. market. And I believe there was a
22 commenter, Tess Barr with Bright Pharma, commented during the
23 webinar. And I believe that there's going to -- Patrick Barr
24 with Bright Pharma will be here later today and will be
25 providing comments. But they are the manufacturer, the only

1 manufacturer of USDA organic pullulan, and it's available. And
2 they are able to increase capacity.

3 But the pullulan is a strange thing. I think this is
4 what I heard Tess say on the public comments, is that they
5 welcome more people into the supply chain. That competition is
6 a good thing. And I think that's really the stabilization.
7 It's fairly new on the list. There's a lot of companies that
8 are using organic pullulan. There's a lot of companies that
9 are trialing it and kind of doing in that transition space.

10 If you were to take pullulan off the national list,
11 you wouldn't even be able to -- a company wouldn't even be able
12 to use it in the made-with category because of its non-
13 agricultural classification. And so this is the regulatory
14 irregularity that I'm referring to, is that typically with
15 commercial availability on 606, when something becomes
16 available in organic form, it comes off of 606. And if you're
17 making an organic product in the 95.5 label, you have to use
18 organic. But if it's an agricultural ingredient, you can still
19 use that in the 30 percent and make a made-with claim.

20 But because it has that non-agricultural
21 classification, if a supplement company wanted to make a
22 supplement and use non-organic pullulan capsules, they wouldn't
23 be able to unless that pullulan is on the non-agricultural
24 list. And so there's a bit of an inequity there in terms of
25 somebody opting to do that made-with claim versus somebody that

1 wants to use that USDA organic seal.

2 And so I think the classification of materials issue
3 there is that if something can be produced organically, right,
4 if something's on 605 and it's a fermentation process and we
5 know we have organic pullulan, should that actually be sitting
6 on that non-agricultural list? Should something be classified
7 as non-agricultural if it can be produced organically and the
8 rule certifies agricultural products?

9 So just something to contend with, not exactly a
10 priority, as I've said in our comments, but I think we continue
11 to kind of trip on this classification issue. So I just wanted
12 to bring it up.

13 BD. MEM. NANDWANI: Sorry. Did I get that in case
14 the organic pullulan is available, we may have to work on the
15 classification from non-agricultural to agricultural?

16 MS. WYARD: It's something to consider, right?
17 Because right now if we said, okay, there's plenty of organic
18 pullulan in the marketplace, let's take pullulan off the
19 national list. If it were 606, if it was coming off 606, if
20 companies wanted to continue to use the non-organic form and
21 use the made with label claim, they could.

22 So you know, there's a long, complex history. The
23 fact that it even is on the national list classified as non-
24 agricultural is because of what happened through the decision
25 tree. But this is where we have some real issues when it comes

1 to classification of materials, specifically to fermentation
2 and fermentation byproducts. It's less than perfect.

3 BD. MEM. NANDWANI: Thank you.

4 CHAIR SMITH: Couple more. Kim?

5 BD. MEM. HUSEMAN: Sorry, I thought we were going
6 with Amy first. That's okay.

7 Okay, Gwendolyn, I really appreciate your comment.
8 And as I think of pullulan, this is a word that now has become
9 almost like at the dinner table, well, not literally but --

10 MS. WYARD: Well, I love saying it.

11 BD. MEM. HUSEMAN: I think it's the stakeholder
12 awareness that is where I'm going to derive, or I'm going to
13 send this question. And as we get into handling in the 606s,
14 how do we drive more conversation than unanswered questions to
15 stakeholders of, are we at commercial availability? And then
16 not getting any kind of a response other than, well, we're not
17 comfortable with commercial availability, so how do we -- I
18 feel like you've done a really nice job of bringing awareness
19 and saying, all right, you've got one manufacturer. And we've
20 been able to get a manufacturer to the table. How do we do
21 that for casings or collagen gel or other products?

22 MS. WYARD: Well, you know, for as long as I can
23 remember, as long as I've been alive, my basic understanding of
24 economics is change happens in the marketplace and it comes
25 from demand. And so, you know, is there enough demand out

1 there? Are the shoppers out there asking for organic casing?
2 Are the shoppers out there, you know, asking for organic
3 pullulan? Who's influencing who? And where are we at in the
4 total scale of, you know, organic versus conventional?

5 So I think that, you know, I hate to go there, but
6 it's the old, like, well, we've got a lot of educating to do.
7 But the industry will arrive if the demand is there, if the
8 shopper says this is what I want, the supply will come. I
9 truly believe that.

10 And in the case of when it's time to remove something
11 from the national list, I think that the private sector
12 industry is best positioned to come together and step up to the
13 podium and say we think it's time for this to come off the
14 national list. I really think they are the ones to do it.

15 And if you look at the changes that have been made to
16 the national list, the application of commercial availability
17 to yeast, you know, that was really, you know, industry
18 stepping up and saying we want this changed. The successful
19 petitioning of something off the national list or on the
20 national list has really gone through when everybody has come
21 together and it's sort of been an effort of the Organic Trade
22 Association or, you know, a combined industry group saying it's
23 time. And if the demand is there, it's time.

24 CHAIR SMITH: Amy?

25 VICE CHAIR BRUCH: Thank you, Gwen.

1 It's actually a little bit of a piggyback off of
2 yours, Kim, so I'm glad you went first. This is also on
3 commercial availability. You mentioned industry stepping up.
4 I'm just wondering a little bit more from an accessibility
5 option, what's the jurisdiction with commercial availability
6 because since we're a global program, the dynamics are a little
7 bit different than just industry stepping up perhaps. I just
8 wanted to understand how do we grow organically and reduce
9 synthetics while ensuring a level playing field that's
10 cognizant of producers who have access to these seeds or
11 flavors, yeast and those from our global partners that maybe do
12 not have access and will never have access to those options
13 organically.

14 MS. WYARD: So I'm going to just be very honest
15 about, you know, my opinion of commercial availability. I'm
16 going to just be real frank is that I don't think it works. I
17 think it is a round peg in a square hole or something like
18 that. Why can't I get that out? It doesn't fit.

19 We have a capitalistic supply and demand system, and
20 I've talked to many economists about this, and it just doesn't
21 work. We'll continue to kind of go in this nowhere circle. It
22 was put into the regulation to help the organic production
23 systems and handling systems catch up, but it continues to be
24 abused.

25 So I think that we have to get it out of the

1 regulation, and I think we're closer to getting it out of the
2 regulation for 606 because we can fall back on the made-with
3 label, but I think we have a long ways to go with organic seed.

4 And what I wouldn't ever want to see is removing the ability
5 to use, particularly with organic seed, there may always be a
6 reason to use non-organic seed. And so I don't think we ever
7 go completely away from commercial availability, but maybe it
8 transfers more to, like, a temporary variance, right, in cases
9 where somebody absolutely needs to use non-organic seed.

10 And, you know, the European system is very different
11 than the U.S. system. You know, I don't think it's right to be
12 trying to, like, kind of compare U.S. versus EU. There's some
13 elements we can take from, but I think that the more we try to
14 adjust and fix and make commercial availability work, we're
15 going in the wrong direction. I think we have to get it out of
16 the regulation, and we have to take a very systematic and
17 aggressive approach at getting there, but also a realistic one.

18 CHAIR SMITH: Thanks, Gwendolyn.

19 Up next is Mike Menes, then Ramy Colfer, and then
20 Brian Pontius. Name and affiliation, and you can get started.

21 MR. MENES: I'm going to be less entertaining than
22 Gwendolyn. That's a tough act to follow. I get to talk about
23 something fun called, like, testing.

24 My name is Mike Menes. I'm the Chief Technical
25 Officer at True Organic Products at True. True is the leader

1 in organic fertilizer manufacturing in the U.S.

2 Organic integrity has been at the core of our
3 business since its inception. In fact, it was the basis of our
4 name in the name development. So thank you to the NOSB and the
5 NOP for your tireless efforts in the continuous improvement of
6 organic, in particular, the residue testing for a global supply
7 chain.

8 Whenever you talk about fraud in any industry, the
9 discussion will inevitably turn to testing. How can you tell
10 that an object of your investigation or interest is authentic
11 or fake? My scientist hat immediately says, let's test it.
12 What does the data say?

13 One of the roles at True is food safety. We're
14 looking for human pathogens in every lot that we produce,
15 because it could potentially touch produce that is eaten raw.
16 Many parallels can be drawn when comparing food safety with
17 organic integrity testing. Simply replace the words organic
18 integrity for the words food safety.

19 I'm looking for salmonella. Now I'm looking for
20 prohibited substances. More detail is in our written comment,
21 but I'll point out some specifics here. Get a representative
22 sample and train the people appropriately for getting that
23 representative sample. Get the appropriate sampling plan for
24 it. Sampling for grain, a truckload of grain, is much
25 different from a field of spinach, and use the appropriate

1 tools for it.

2 So sampling from a bulk truck of grain versus 80
3 acres of romaine, you're going to use different tools. Always
4 understand the cross-contamination potential, and this is
5 throughout the supply chain.

6 Use a reputable laboratory with industry-approved
7 methodology. So, specifically, you could use an ISO 17025
8 accredited laboratory that is using methodology approved by the
9 AOAC.

10 All these things are important, but what I want to
11 point out is you can increase the contents in the product by
12 combining a panel of tests or a whole slew of them. There may
13 be a number of tests that are needed to provide the conclusive
14 evidence of economically motivated adulteration. This panel
15 may need to be specific to a particular matrix. That is, these
16 tests for organic authenticity testing may be different for
17 celery or for soybeans, for cotton, or for liquid organic
18 fertilizer.

19 Fortunately, you and I don't have to figure any of
20 this out. There are programs out there already addressing the
21 issue, and so we can rely on the professionals that are already
22 concentrating on that.

23 So, at True, we're going to continue what we do.
24 We're going to promote the U.S. farmer. We're going to protect
25 the organic seal, and we're going to push for the organic

1 consumer. I'm ready to answer some questions for you.

2 CHAIR SMITH: Thanks, Mike. Questions from the
3 Board?

4 Did you want to ask a question, Amy?

5 VICE CHAIR BRUCH: Sure. Thank you, Kyla.

6 Mike, thank you for your comments today and your
7 written ones you provided. Can you unpackage a little bit more
8 about metabolite testing? That was something that we had
9 indicated that it could be a good clue, specifically maybe for
10 glyphosate, but you had mentioned maybe on input testing,
11 metabolite testing, maybe not the right test for the situation.
12 Is that true?

13 MR. MENES: Well, I think metabolomics, if you will,
14 is something that is not fully explored enough yet for all the
15 different matrices, and that's when I say it's matrix
16 dependent. So, there could be a biological event that provides
17 metabolites that could identify fraud, but I personally don't
18 know enough about it.

19 One thing that I would point out is the group called,
20 I think it's called Toffo. It's an acronym for it, but it's a
21 group from Eurofins that it's -- the website is called Toffo-
22 food.com or something like that, or project.com, and they do
23 talk about metabolites in their process in there.

24 The example I gave in our written comment was, hey,
25 you could have a metabolite of nitrate that comes as a result,

1 but could that nitrate come from other places? Absolutely.

2 How do you identify that for a particular thing?

3 I think there's a lot more work that needs to be done
4 and a lot more definitions that could ensue from that, but more
5 importantly, it's specific for the type of matrix that you're
6 looking for.

7 CHAIR SMITH: Nate?

8 SECRETARY LEWIS: On the topic of testing inputs, I
9 think we always come back around to that -- input manufacturers
10 like yourself aren't squarely under the purview of the National
11 Organic Program, and you seek CDFA, OMRI, this sort of
12 hodgepodge of reputable groups that gain you access to the
13 market, but when we sort of start to think about testing in
14 inputs for inputs quality, how do we kind of connect those
15 regulatory bodies so that we actually have some teeth when
16 we're starting -- and it's not completely borne by the farmers
17 using the products that may be contaminated?

18 MR. MENES: Yeah. So I think there's some testing
19 internally that you can do. So very specific to your own thing
20 that you're manufacturing. Where does the burden of proof
21 really lie, and if we could do some additional testing to
22 provide that, and who do you tell that to, right? So is it
23 OMRI or CDFA or the MROs?

24 Yeah, I think the additional testing could provide
25 some more insight to that.

1 CHAIR SMITH: Thanks, Mike. Appreciate your time.

2 Up next, we have Ramy Colfer, then Brian Pontius, and
3 then Kim Dietz.

4 Ramy, name and affiliation, and you can get started.

5 MR. COLFER: All right, thank you very much. My name
6 is Ramy Colfer. I am here representing True Organic Products,
7 also. I'm the vice president of research, development, and
8 field agronomy.

9 First, I'd like to thank the NOSB and NOP for your
10 great commitment to organic foods and the opportunity to speak
11 today. I have spent the last 24 years working on the Central
12 Coast in organic vegetable and fruit production, working at
13 True Organics over the last six years, and for EarthBound Farm
14 in the internal farming department for 18 years.

15 I am here today to promote, like Mike, the expansion
16 of the use of prohibited substance residue testing. In
17 particular, we support the expanded residue testing to include
18 synthetic nitrogen residue.

19 Going back to my history of organic farming, I
20 observed how fraudulent organic fertilizer being manufactured
21 by Port Organics and California Liquid Organics damaged the
22 organic seal and consumer's trust in the organic label. This
23 was eloquently described in a recently written article by Chris
24 Bennett in the Farm Journal. While this scale of fraud may not
25 be occurring in the United States, it's hard to know exactly

1 what's happening in countries with few organic inputs, minimal
2 organic certifier oversight, and few laws discouraging organic
3 fraud.

4 And while the NOP launching SOE has been a
5 substantial improvement in improving organic integrity, it
6 would be improved further with residue testing. Now is the
7 time to expand the panel of prohibited substances residue
8 testing for organic produce, especially in organic products
9 from regions with high risk.

10 I'd like to also mention True has been working with
11 commercial labs in the AOAC to help develop interest in the
12 formation and validation of panel tests to evaluate the
13 authenticity of organic products. An NOSP requirement for
14 broader prohibited substances residue testing would encourage
15 these groups to pursue this direction.

16 Specifically, synthetic nitrogen residue testing
17 would be technically and economically feasible and would be a
18 useful tool for a wide range of organic products, including
19 crops that rarely have pesticide residues, organic or
20 conventional, such as avocados. This type of residue testing
21 is already being done in Europe by Eurofins, required by the
22 stakeholders, like Mike mentioned, this group Toffo. Great
23 name, by the way.

24 I grew up with back to the earth hippie parents in
25 Santa Cruz, California area. I remember going to stores like

1 Community Foods as a young child in the '70s, where my mother
2 would buy organic foods. My mother now, 83, is committed to
3 still buying organics, including and I believe organic is the
4 answer. But we need to ensure organic food is legitimate and
5 authentic. Thank you.

6 CHAIR SMITH: Thank you. Amy.

7 VICE CHAIR BRUCH: Thank you, Kyla. Thank you, Ramy,
8 for your comments today.

9 I think synthetic nitrogen definitely should be a
10 focus area. We heard from a prior speaker within your company
11 that nitrogen testing has evolved and we're really able to
12 essentially define intentional or fraudulent synthetic use.

13 I had a question. To couple our process-based
14 standard, would it be possible, as a homework assignment for
15 you to generate pounds of nitrogen or units of nitrogen per
16 produce crop, vegetable crop, maybe on the list that Dr. Tucker
17 had presented of the top ten things that are being imported,
18 and that might be good supplemental material for certifiers to
19 have, in addition to understanding that testing is available,
20 they can maybe look at units of N to grow these types of crops.
21 Would that be something easily generated by you and your
22 company?

23 MR. COLFER: Absolutely, yeah. I mean, we could do
24 that very easily, yes.

25 VICE CHAIR BRUCH: And could you also put on crop

1 rotations as well? Because I know in grains we have crop
2 rotations that also contribute natural sources of nitrogen, but
3 it might be good to come up with a matrix that could be
4 presented. Would that be something that your company could
5 lead?

6 MR. COLFER: Yeah, yeah, definitely.

7 VICE CHAIR BRUCH: Okay. Less of a question, more of
8 a declaration. Sorry, I apologize. An assignment.

9 MR. COLFER: Yeah. I will say, yeah, I mean, most of
10 my day job has been, like, helping organic growers with organic
11 fertility programs and developing new products. And I think
12 there's a comprehensive understanding of how organic fertility
13 works and what's necessary to grow a good crop. And there's
14 many different ways to do it organically, but I think there is
15 essential nutrients needed, whether it comes from cover crops,
16 previous crop residue, or inputs, yeah.

17 VICE CHAIR BRUCH: Thank you.

18 MR. COLFER: Yeah, thanks.

19 CHAIR SMITH: Stay put. You have another question.
20 Nate Powell-Palm.

21 BD. MEM. POWELL-PALM: When we talk about testing, my
22 mind always goes to who is going to be doing the testing. And
23 so for nitrogen, I was wondering if you could give us any
24 recommendations for who the best testing training institutes
25 would be to look to, to actually train folks to do this sort of

1 testing. It's very different than just collecting grain
2 samples. Or if you have, you know, a cross testing, I think we
3 need to be thinking about where we're going to be looking for
4 improved inspector training if those are the folks who are
5 going to be doing it.

6 MR. COLFER: Yeah. I think it would naturally be
7 done by the certifying agencies. And I think that it would
8 require training, and I think there's lots of standards out
9 there for sampling and, you know, figuring out exactly what
10 each of these matrices look like would take some research. And
11 I know, you know, there would need to be some investment and
12 some, you know, research to figure out each of these
13 commodities.

14 But I think that's really the goal in getting these
15 labs and AOC involved is really closing the circle. We have
16 our stakeholders. We have our experts that are able to do
17 these tasks with different matrices. We really need to kind of
18 bring everybody together.

19 CHAIR SMITH: Thanks so much. All right. Teacher
20 Amy gave you an assignment, so we'll look forward to that
21 submission at a later date. Thanks so much.

22 Up next, Brian Pontius, then we have Kim Dietz, and
23 then John Foster.

24 Name and affiliation, and you can get started.

25 MR. PONTIUS: Great. Thank you. Good afternoon,

1 Chair and members of the Board. My name is Brian Pontius, and
2 I'm here representing Ingevity, which is based in North
3 Charleston, South Carolina, and for over 100 years has been
4 providing products that purify, protect, and enhance the world
5 around us.

6 We understand that the adoption of BPI's petition
7 would be a policy shift in how compost feedstocks are managed
8 in organic agriculture. We believe the BPI petition clearly
9 explains why the ASTM standards are appropriate and sufficient
10 in a way that addresses many of your concerns.

11 Since the Crop Subcommittee made its recommendation,
12 a number of companies and organizations have signaled their
13 support for BPI's petition. This includes the Georgia, South
14 Carolina, and Kentucky Departments of Agriculture, as well as
15 Western Growers. The U.S. Composting Council noted 78 percent
16 of their membership supports the BPI petition as filed with the
17 USDA in the inclusion of certified compostable products.

18 The City of San Francisco and many other composters,
19 brands, and packaging companies like Ingevity comprise a long
20 and diverse list of entities that support BPI's petition and
21 recognize the need for a changed definition of eligible inputs
22 for organic compost. We believe this highlights widespread
23 desire and need to find a reasonable and science-based solution
24 to ensure composters have a pathway for processing feedstocks
25 for organic agriculture in a way that allows them to stay

1 legally compliant.

2 We must recognize that not every food service item
3 can be replaced with a reusable, recyclable, or an alternative-
4 to-plastic format, and that goes for USDA organic food that is
5 packaged as well. I'm just giving you two examples, the banana
6 peel with a plastic produce sticker and this plastic-coated
7 product here as well. So if we don't invest in alternatives,
8 what we're going to be stuck with are conventional plastic
9 products that we know, particularly in a compost pile, can
10 produce persistent microplastics.

11 Companies like Ingevity, after years of research and
12 development, have developed compostable food packaging that
13 addresses many of the environmental challenges we face. States
14 like California have recognized the need to incorporate these
15 advances into composting standards and stakeholders around the
16 country are eager to see NOP acknowledge these advances as
17 well.

18 Unfortunately, if a petition fails, certified
19 compostable products will not be an option to be sold in
20 California and will likely be placed with conventional
21 plastics, which have been shown to increase persistent
22 microplastic contamination in our environment. Stakeholders
23 all across the value chain working on composting will suffer if
24 we do not make a decision that is based on the best available
25 science in a way that is expedient.

1 We therefore ask that you please support USDA in
2 publishing BPI's requested rulemaking and to use that process
3 to resolve any differences of opinion. I'm happy to stand by
4 for any questions. Thank you.

5 CHAIR SMITH: Thank you. Questions from the Board?
6 Franklin, go ahead.

7 BD. MEM. QUARCOO: So I've been thinking about this
8 compostable plastics. And we have microorganisms that break
9 down synthetic stuff. Even though they were not designed
10 originally to do that, they break some synthetic stuff down.

11 Now, if we have compostable plastic, has anybody
12 looked into the fitness cost of microorganisms breaking these
13 things down? Could it become a selection factor that just
14 drives the population of microorganisms and selects certain
15 microorganisms and then eliminates some of them? I don't know
16 whether you're pressing on me to ask, but anytime I hear of
17 compostable plastics, I think about fitness cost to the
18 microorganisms that are breaking these things down.

19 MR. PONTIUS: So, just to clarify if I understand
20 your question, your question is what is the impact of what
21 microorganisms break down, sort of like compostable products,
22 and which ones don't?

23 BD. MEM. QUARCOO: Yeah, when they break it down,
24 what happens to them? What happens to the different species of
25 microorganisms? Are we causing a change? They are breaking

1 it down, but what's happening to them?

2 MR. PONTIUS: Yeah. So I'm going to answer your
3 question in a broad way, but in a way that I can answer it
4 honestly without reaching. The microorganisms that can break
5 down certified compostable and biodegradable products are
6 naturally occurring and are available in the environment.

7 So to give you an example, I mean, there's certified
8 biodegradable and marine biodegradable products, right? So
9 that just means those products can be broke down by
10 microorganisms available in the marine environment. So
11 different products are designed to break down in different
12 environments.

13 When we look at compostable plastic products and
14 certified industrial compostable products, those are referring
15 to the products that they can break down in an industrial
16 composting facility where those microorganisms are present and
17 can break down those products along with the food waste. I'm
18 not sure that was satisfactory, but that's about what I can
19 give you.

20 BD. MEM. QUARCOO: I'll leave it alone.

21 CHAIR SMITH: Amy.

22 VICE CHAIR BRUCH: Thanks, Kyla. Thanks for your
23 time today. I really appreciate the information. We are
24 working as a Board to weigh in the diverse perspectives on this
25 subject matter, and you mentioned a statistic. Could you

1 repeat that statistic about support?

2 MR. PONTIUS: Yeah. So the U.S. Composting Council
3 surveyed their members, and of that survey, 78 percent
4 supported it, the petition.

5 VICE CHAIR BRUCH: Okay. Thank you.

6 I wanted to know, and I'm not sure if you have the
7 breakdown of who is members of the U.S. Compost Council, but I
8 haven't seen a lot of farmer comments on this subject. I've
9 heard from industry. I've heard from some different private
10 sector companies. I was just wondering what the farmer is
11 thinking. Are they requesting this? Is this something
12 essential? Do you know what their voice in this equation is?

13 MR. PONTIUS: Yeah. No, I appreciate that question.
14 I mean, I think as far as the farmer's voice, we have tried to
15 reach out to that community, which is why we now mention there
16 are several departments of agriculture that have supported the
17 petition. I mentioned Kentucky, South Carolina, and Georgia.

18 You know, I think the struggle with a lot of this is
19 people are very far removed from it, right? I mean, we're very
20 far removed. I think organic producers making the finished
21 food packaging are very far removed from what's going to happen
22 in 2032 when all of your packaging has to be recyclable or
23 compostable. And so, similarly, for the farmers, I think a lot
24 of them, they're very far removed from what the compost they're
25 processing in their feedstocks, what their options are, and

1 what their options would look like if they had more composters
2 coming online who can process that food waste and expand the
3 supply of organic compost.

4 So I think the difficulty is they're far removed from
5 where we're at in this process. And that's why we have tried
6 to reach out to some of those groups. You mentioned Western
7 Growers. Some may say Departments of Ag. I think when you
8 have the conversation, you're able to explain the safety of our
9 products and how we can increase the supply of organic compost.

10 I think that's something that they're excited about.
11 But, you know, we're a very small niche industry and our
12 ability to outreach is limited. So we're able to do that. I
13 think there has been a positive response.

14 VICE CHAIR BRUCH: Would you agree that they're the
15 recipient, though, ultimately, for the compost? In this
16 circular economy, aren't they the solution to where this
17 compost would be going?

18 MR. PONTIUS: Yeah, oftentimes, absolutely. I mean,
19 along with, you know, farmers are, nurseries, a variety of
20 purposes, right? And so, yeah, they're one of the audiences,
21 certainly, that would benefit from allowing more of these
22 industrial composters to have their compost surveys organic and
23 expand that supply.

24 VICE CHAIR BRUCH: Thank you.

25 CHAIR SMITH: Thanks so much for your time.

1 MR. PONTIUS: Thanks.

2 CHAIR SMITH: Up next, we have Kim Dietz, then John
3 Foster, and then Karen Warkentien.

4 Kim, you know the deal.

5 MS. DIETZ: Hi, Kyla. Board. Good afternoon. My
6 name is Kim Dietz and I'm speaking today as founding partner of
7 Strengthening Organic Systems.

8 I've been fortunate in my career to have many firsts
9 in this organic community. I served as a handler
10 representative on the first NOSB in 2000 to 2005 under the USDA
11 when we first brought the rule to all of us. I managed the
12 certification process for the very first certified organic
13 handling facility in the U.S., another milestone, difficult,
14 but a trailblazer.

15 And it was while working for that company that we
16 developed the very first certified organic flavor. I say this
17 today because I've had a very rewarding history of standing in
18 front of you all with those many firsts. And today, as a small
19 business owner, this is also the first time I'm independent
20 speaking on behalf of myself, which is really quite something.

21 Today, my comments will be on the handling topics of
22 vitamins and minerals and commercial availability, both of
23 which are near and dear to me and that I've followed my entire
24 career.

25 So there's a long and complicated history around the

1 listing of vitamins and minerals that have never really been
2 fully resolved. In short, the current annotation is
3 referencing 21 CFR 104.2 that is not maintained by FDA, nor
4 does it reflect the nutrients and vitamins that were reviewed
5 and approved by NOSB way back in 1995, folks. It does not
6 contain several of the essential vitamins and minerals required
7 in food products today, and it does not reflect an annotation
8 proposed by NOP in 2012.

9 Instead, we have an NOP interim rule that continues
10 the allowance of vitamins and minerals that are not listed
11 under 104.20 with no further clarification on which nutrients
12 may be added to organic products. It's messy and it's
13 inconsistent.

14 SOS believes there is room for updating the
15 annotation to reflect a more appropriate FDA reference and/or
16 even NOP guidance to clarify the nutrients that may be added to
17 organic products.

18 Lastly, commercial availability. Boy, we've heard a
19 lot about that today and even yesterday. It was intended
20 originally to be used as a tool when we didn't have supplies.
21 So as someone who developed the very first certified organic
22 flavor 20-something years ago, now we have thousands and
23 thousands and thousands of flavors. So for the past 20 years,
24 it has served a purpose. Unfortunately, what was once used as
25 a tool is now a burden.

1 Some organic businesses are being forced to sell
2 their products as conventional because they have too much
3 supply, and that's a fact. Yesterday, I received an email from
4 a company that stopped selling organic because of this issue.
5 I urge the NOSB to take the topic seriously and improve the
6 process. Thank you all.

7 Questions?

8 CHAIR SMITH: Go ahead, Kim.

9 BD. MEM. HUSEMAN: Hi, Kim.

10 MS. DIETZ: Hi.

11 BD. MEM. HUSEMAN: I've seen your name on so many
12 documents as I've reviewed things along the way, so thank you.

13 MS. DIETZ: Oh, you're welcome.

14 BD. MEM. HUSEMAN: For the work that you've done on
15 the Board. And Ken asked this question earlier, and there's a
16 lot of comments, and I'll continue to ask it, but commercial
17 availability is almost a subjective word. How do we continue
18 to get more producers to come and state their case to help us
19 with the viability of sufficient supply?

20 MS. DIETZ: Yeah, so I think part of the problem that
21 you're seeing in the industry is even those, and I'll use
22 flavors because I worked for a leading flavor company after a
23 juice manufacturing company, and they have both conventional
24 supply and they have organic supply, right? So it's a matter
25 of, you know, they develop the organic, they have the supply of

1 organic, they try to sell the organic, yet there's this, you
2 know, check the box, and then you don't have to use organic,
3 you can use conventional, and they have the same customers,
4 right?

5 So I think it's a difficult place for some companies
6 to be. Then you also have these dedicated organic companies
7 that are going to go out of business because they have supply.
8 My, you know, goal in my new role in my new company is to
9 actually start pulling together some of these companies and
10 coalitions and possibly petitioning to change, to change
11 flavors, for example. And let's start moving the needle,
12 right?

13 We know that there's a lot of organic extracts out
14 there. We know that there's a lot of botanicals. So let's
15 just start to make the change. But it's going to take somebody
16 to push and change it. I hope that answers your question.

17 CHAIR SMITH: Jerry, go ahead.

18 BD. MEM. D'AMORE: Thank you very much for your
19 testimony. You said it twice, but it escaped me as to what it
20 was that you were trying to make a point on. What is the issue
21 in your mind when an organically produced item is sold
22 conventionally? It drives something that I think that you see
23 as damaging.

24 MS. DIETZ: Yeah, I think it's, you know, it goes
25 against what we're trying to do, which is to grow organic and

1 supply. So if you have organic supply and it ages, let's say,
2 for example, you've got thousands of pounds of something and
3 it's not selling, then you're going to convert it to organic
4 sales and sell it at a cheaper price, and then you're going to
5 stop selling that organic product because there's no demand.

6 So Gwendolyn said supply and demand.

7 BD. MEM. D'AMORE: And that would have been exactly
8 what I would have said right now. This is solely a demand
9 issue.

10 MS. DIETZ: It is.

11 BD. MEM. D'AMORE: Right. Okay. Thank you very
12 much.

13 MS. DIETZ: You're welcome.

14 CHAIR SMITH: Good job, everybody. Thanks, Kim.

15 John Foster, you're up next, followed by Karen
16 Warkentien, and then Marni Karlin.

17 MR. FOSTER: Good afternoon, everyone. Lovely to see
18 you all. I feel like Kim and Gwendolyn, they just created more
19 room for more thunder with the commercial availability, which
20 we'll get to in a second. But my name is John Foster. I'm the
21 COO for Wolf & Associates, organic consulting firm, also known
22 as the organic specialist. I am on the Board of directors for
23 Organic Seed Alliance. And we had a hand in the Meloxicam
24 petition. So I think that's all my due diligence there.

25 Our main interest is more organic acres with

1 integrity. That's the real driving force behind pretty much
2 everything we do. It's not our mission, but it is a driving
3 force. And I want to be upfront about that. So in terms of
4 general comments, we submit a lot of written comments. There
5 are many of them. Happy to answer any questions on any of
6 those.

7 Our standard counter patter is please make the
8 national list as inclusive and accommodating as possible,
9 particularly remembering that those who use it are not
10 necessarily here in the United States. That's really
11 important. A lot of folks don't have the same access to
12 materials, certainly not the same price, seasonality, et
13 cetera. So please be mindful of that.

14 You've all heard me talk about commercial
15 availability until you're really tired of it on 205-605. So
16 I'm going to harp on that a little bit better later. And also
17 I'm going to introduce this, what will, I hope, be a future
18 intuitive term, commercial desirability instead of
19 availability.

20 You should also, as I offered in Milwaukee, no one
21 took me up on it, except members of the NOP, actually, you
22 should ask me about how SOE is going. We're in a fairly unique
23 position to see a lot of different ways that SOE has been
24 applied by many different certifiers in many different states
25 and countries.

1 On Meloxicam, as I said, we had a hand in that. We
2 believe this is very unique in that Meloxicam was -- the
3 petition was submitted by producers and veterinarians, not by
4 an input manufacturer. That's a really big difference. You
5 should note that.

6 The PPM is quite clear about how TRs need to be,
7 under what circumstances they can be asked for. External TRs,
8 you're more familiar with the PPM now than I am. There are --
9 it was a thorough petition and appendices. Those of you who
10 bothered to read the 538 pages, it was exhaustive, and that was
11 by design. A lot of technical information. Every TR question
12 was answered. I know that because there was a map linking
13 every question in the TR to exactly where it was located in the
14 petition or the appendices.

15 I think that the Livestock Subcommittee did an
16 excellent job. They don't get enough credit for that because
17 it was an exhaustive petition.

18 When it gets down to annotations, please be clear
19 about your intention for those annotations. Do that in the
20 cover letter. Since specific annotations in this case need
21 interagency collaboration, have faith in the process and rely
22 on them to do that work.

23 CHAIR SMITH: Thanks, John.

24 MR. FOSTER: I can go for days.

25 CHAIR SMITH: Questions? Amy?

1 VICE CHAIR BRUCH: John, thanks for your time today
2 and your written comments as well. I'm going to ask you, how's
3 SOE going?

4 MR. FOSTER: Well, it's funny you should mention
5 that. So in general, I think it's going very well. I remember
6 about -- it was probably this time a year ago. There was some
7 question about how doable it was, and we felt like it was quite
8 doable. And I think it's going very well. And then it was
9 nice to hear the statistics, particularly about the import
10 certificates this morning. I think that in part validates it.

11 The thing I'm most, I wouldn't say worried about, but
12 noting is that as certifiers have been constrained by
13 inspection supply, I'm not sure that the inspector selection
14 criteria, not for qualification, I mean how a certifier chooses
15 an inspector for a specific inspection. What I'm noticing is
16 that larger and larger corporations are reporting that the
17 quality, not the qualification, but the quality and preparation
18 of the inspector has been less than optimal, particularly for
19 larger organizations who are used to a pretty high level of
20 food safety audit and auditors.

21 We sit in on a number of inspections for our clients
22 and some are fantastic and some are awful. And I'm not certain
23 that the mechanisms that certifiers use to get a sense of how
24 well their inspectors are doing are effective, for various
25 reasons.

1 I think if certifiers had an unvarnished view of that
2 activity on a broader basis, there would be more feedback and
3 better selection in how and a specific inspector is why they
4 would be sent to a specific operation, particularly larger ones
5 that are coming in as a function of SOE particularly.

6 CHAIR SMITH: Kim?

7 BD. MEM. HUSEMAN: All right. I'm going to lean into
8 the slide that's presented, but hasn't really --

9 MR. FOSTER: Did I leave that one up there?

10 BD. MEM. HUSEMAN: I mentioned earlier in the day
11 about this report called the WASDE, which is about world supply
12 and demand. And can you speak to how do we prove demand?
13 Because -- and I'll just -- before I get there. I think Kim
14 made a very good comment earlier about how supply can lead to
15 market erosion and some different market dynamics and how
16 demand can drive that supply.

17 So how do we prove demand?

18 MR. FOSTER: How do we what? How do we what?

19 BD. MEM. HUSEMAN: How do we prove demand in order to
20 address 605 and 606?

21 MR. FOSTER: So some of you will remember me talking
22 about this idea of a registry of supply in past NOSB meetings.
23 Probably till you're tired of hearing about it. This is
24 exactly how you do it.

25 For seed or ingredients, doesn't matter. I have come

1 to the, I think, realization that we use the term commercial
2 availability because it's in the regulation. But I think that
3 has been to the detriment of actually effective change because
4 supply drives -- I'm sorry, demand drives supply, generally
5 speaking, not the other way around. But we've characterized
6 this commercial availability, that's a supply thing.

7 So if I believe now that if you can quantify demand,
8 someone will fill that. Someone will figure out a way to go
9 get that stuff. What's available is nice, but what's needed is
10 better, way better. Because in this culture, in this kind of
11 society we're in, anyone who says, I have this need, someone is
12 going to fill that. I have this supply. That's great. But
13 demand is way better.

14 So this idea of a registry that could be, I think,
15 maybe with some pain to start, but cobbled together from
16 collecting, collected as part of the OSP, just like any other
17 data, to say, for example, in aggregate we need approximately
18 700,000 pounds of organic conquistador celery seed. Like,
19 that's demand. So someone then could go to their CFO and say,
20 I need investment dollars to go create 700,000 pounds of
21 organic conquistador celery. Here's the demand. That's
22 documented in some way.

23 Now, that's the opposite. That's commercially
24 desirable, not available. I think that's a -- it's a really
25 existential difference, kind of esoteric, but I think it's an

1 important one if we want to effect real change.

2 CHAIR SMITH: Nate?

3 BD. MEM. POWELL-PALM: I just have to follow up on
4 that. What was the mechanism you were thinking would be used
5 to collect that data?

6 MR. FOSTER: Regrettably, I think it's in OSP.

7 BD. MEM. POWELL-PALM: And do you -- okay. I'm
8 trying to imagine a world in which someone would volunteer that
9 information without being compelled to do so. Any ideas on
10 like how you would sell that to folks who are already iffy on
11 privacy.

12 MR. FOSTER: Well, they share a lot of other
13 proprietary information in the context of an OSP. That's why
14 it would take a certifier or the NOP directly, because they're
15 not going to give it to me. Right? In aggregate. Certifiers
16 in aggregate, they can anonymize all of that. So in very, very
17 rare cases with this -- with the demand be so small that you
18 can identify, you know, one operator. It would be -- there
19 would be pain involved and lots of angst and teeth gnashing.
20 It's not easy, but none of this is easy.

21 But we've been sitting on this commercial
22 availability thing for a quarter century. And there have been
23 some successes. Hops, for example. Right? That was -- that
24 seems to be a rarity, though. And we just need more of those.
25 I think the trick is to quantify demand.

1 BD. MEM. POWELL-PALM: On the inspector notes you
2 made, could you share any of the sort of specific quality
3 deficiencies that folks you've been talking to have noticed?
4 Is it math? Is it auditability?

5 MR. FOSTER: Yes, I can. It's preparation.

6 BD. MEM. POWELL-PALM: And that's just being -- and
7 sorry for interrupting you, but just being familiar with the
8 OSP. Walking in, ready to go, understanding what they're going
9 to look at.

10 MR. FOSTER: Yeah. I think an unusual number are
11 have clearly studied it on the walk in from the parking lot for
12 the first time. They're exploring it when they sit down at the
13 conference room table, for example, or kitchen table.
14 Generally speaking, it's not deficiency in the knowledge of the
15 standard, although that happens to all of us. It's more about
16 dressing appropriately. Questionable judgment around small
17 talk and jokes, I think.

18 But, yeah, familiarity with the OSP before you walk
19 in the door and leaving too much to chance, particularly when
20 it comes to this is changing slightly after SOE, but it's still
21 present. It's leaving too much chance in looking into audit
22 trail questions.

23 BD. MEM. POWELL-PALM: If you'd say a tiny bit more
24 about that, are you saying that they -- do your clients feel
25 like they're actually being raked over the coals enough where

1 fraud would be found?

2 MR. FOSTER: Raked over the coals. In a good
3 inspection, just slightly below raked over the coals. Some are
4 overly exuberant, some inspectors, and that is also a problem
5 because the -- the additional value of that here's being raked
6 over the coals and going up here, where you're shoveling coals
7 onto a hot stove, that -- there's no additional gain there,
8 except leaving a poor -- actually a poor impression of the
9 certifier. Really.

10 Still, inspectors are the primary real face that most
11 operators have with a certifier. So it's not just the
12 inspector, it's the certifier being represented and then by
13 extension, the organic industry being represented. So it's the
14 Goldilocks thing where we want that -- just that sweet spot.
15 And I don't -- I really don't -- I know all certifiers, they do
16 really the best they can do. I don't know of any that are not
17 doing a review of their inspectors and the qualifications.

18 They do a lot of witness inspections, but the
19 inspectors always on their best behavior there because they
20 know they're being observed. And that changes their
21 Schrodinger's inspectors. So I don't think that's the best way
22 to get information. And this happens far too often. Operators
23 are very reluctant to file to list a complaint, particularly
24 before the certification decision comes back. More than half
25 the time where I'm livid as a consultant, the operator does not

1 say anything ever about that.

2 They will say next year, please don't send that
3 inspector again, but not why?

4 CHAIR SMITH: Carolyn?

5 BD. MEM. DIMITRI: Okay. I'm going back to
6 commercial availability. Sorry. Coal raking, Nate.

7 So I guess all of this conversation about commercial
8 availability is making me think like economists call the
9 organic market a thin market, right? There aren't that many
10 buyers. There aren't that many sellers. And it's hard for
11 people to connect. So my thoughts are like a little poorly
12 formed from here.

13 But the idea is because the non-organic versions are
14 so much less expensive, they're sort of incentive set up never
15 to want to use the organic version. So I like this idea of like
16 forcing the information to be more public. And I think some
17 kind of database could actually sort of like, I don't know,
18 take -- show us where the wizard's hiding and make information
19 more available for people.

20 But I think you might need to have like push from the
21 NOP through the regulation at the same time for it to go. But
22 anyway, I was just thinking of thin markets while everyone was
23 talking. Hopefully this is helpful in some regard.

24 MR. FOSTER: Yep.

25 CHAIR SMITH: Thanks, John. Appreciate your time

1 with us.

2 Karen Warkentien, then Marni Karlin, then Bill Wolf.

3 Karen, name and affiliation and you can get started.

4 MS. WARKENTIEN: Yeah, I'm actually of the right
5 height for this microphone, I think. So my name is Karen
6 Warkentien, and I am the director of regulatory affairs for
7 AgroSpheres. We're a biological products company. And I am
8 also the co-chair of the Biological Products Industry Alliance,
9 their organic subcommittee of the registration committee.

10 So my comments are sort of for both of us. So thank
11 you for the opportunity to comment on the inert ingredients and
12 organic pesticide products proposal, addressing the outdated
13 EPA inert ingredients list three and list four, and how to
14 rectify and improve the policies and procedures for
15 establishing allowable pesticide inert ingredients for use in
16 organic crop and livestock production.

17 Key issue at hand is how best to include and maintain
18 inert ingredients for organic crop and livestock production on
19 the national list under 7 C.F.R. 205 subpart G.

20 So as you're likely aware, BPIA, as well as
21 AgroSpheres, has provided comments to the NOSB and the NOP
22 previously, making suggestions as to how the system can be
23 revised and improved. The proposal put out by the materials
24 subcommittee we believe is an elegant solution and one that
25 moves the needle forward in a meaningful way.

1 BPIA and AgroSpheres both strongly support the
2 adoption of the proposal by the full NOSB, including both
3 options for evaluation by the NOP staff and possible inclusion
4 in a proposed rule addresses the concerns of many of the
5 commenters. As stated in our previous comments, we are more
6 supportive of option two as it leverages the reviews and
7 expertise of EPA in their review of the inert ingredients. And
8 it provides the NOSB then the ability to fine tune that list
9 for what you viewed as being more acceptable.

10 It also will review the sunset review burden on
11 future iterations of the NOSB. Option one we believe would add
12 hundreds of individual listings of inert ingredients to the
13 sunset review workload. That invariably would result in an
14 incredible burden on the NOSB affecting ability to accomplish
15 the mission of ensuring compliance with standards.

16 So it's for that reason we would say to start using
17 that EPA review as your baseline. However, I also want to say
18 that whatever mechanism is ultimately chosen, that it's
19 critical that the allowable list be a flexible living list.
20 There must be an effective way to add new inert ingredients and
21 chemistries as they develop to encourage innovation. The way
22 we've been right now, we've been stuck 20 years ago. And as we
23 know, we all want to move forward.

24 So we strongly support the proposal moving forward to
25 the full NOSB for the vote, as you're going to have I think on

1 Thursday morning if I'm not mistaken. And we recommend that
2 the NOSB approve the proposal and move it forward to the staff.
3 Doing so will finally remove references to the obsolete inert
4 ingredients list the EPA provided and provides a path forward
5 to encouraging and supporting innovation and products available
6 for organic crop production. And I thank you again for the
7 opportunity to comment on this proposal.

8 CHAIR SMITH: You might be the new buzzer queen. I
9 don't know.

10 MS. WARKENTIEN: I think I went a half a second over.
11 So apologies on that. Obviously I didn't practice enough.

12 CHAIR SMITH: Nate?

13 SECRETARY LEWIS: There's been discussion at the
14 Board about conveying to the program that we are providing two
15 options, but the rulemaking that the program undertakes could
16 potentially choose some things that we like from option one,
17 things that we like from option two, things that we like from
18 2015 recommendation, et cetera, et cetera. Does that nuance
19 change your position in terms of supporting this proposal
20 moving forward on Thursday?

21 MS. WARKENTIEN: For me personally, no, it doesn't.
22 It certainly doesn't, because I think the biggest thing here is
23 we have a proposal to move forward, to change this. And I
24 think this is a meaningful proposal because it does look at
25 those various options. And like I said, this could be like a

1 Chinese menu where we take pieces and parts, right? You know,
2 give me two dim sum and whatever. But, you know, to make some
3 movement here. The big issue that we in the industry, I think,
4 and while we do represent inert manufacturers as well, some of
5 them in the BPI, I'm speaking as a producer of biological
6 products more so, we find it difficult to produce formulations
7 that really are what folks want to use.

8 You'll notice we make a lot of dry products as
9 opposed to liquid products. Mostly because we can't make, and
10 not totally, but a lot of the products, we can't make them
11 stable in the liquid formulation. We have issues with a lot of
12 the biologicals, you know, that we wind up getting some
13 overgrowth or something like that because we don't have organic
14 preservatives that we can use. So we do a lot of the stuff in
15 the dry formulation. Okay, that's great, but a lot of farmers
16 don't like the dry formulations. They plug nozzles. They do
17 all of these things. You wind up, you get dust with wettable
18 powder formulations. Some of the granules a little better.
19 But the whole thing is there are so many other formulation
20 types we would love to be able to get into, but without having
21 the tools to make them, it becomes more difficult.

22 CHAIR SMITH: Thanks so much, Karen.

23 MS. WARKENTIEN: Thank you.

24 CHAIR SMITH: Appreciate you being with us today.

25 Up next is Marni Karlin, followed by Bill Wolf, and

1 then Milo Petruziello.

2 Marni, name and affiliation.

3 MS. KARLIN: Hi, my name is Marni Karlin, Karlin
4 Strategic Consulting. I work with stakeholders to navigate
5 sticky issues and paradigm shifts in the organic sector. And
6 today, I'm here on behalf of the Accredited Certifiers
7 Association to talk about one of those paradigm shifts, risk-
8 based certification.

9 We are thrilled to see the groundswell of interest in
10 this topic. We appreciate NOP and the NOSB for taking it on.
11 It's not a new idea for certifiers at all, but elevating this
12 discussion here facilitates an important sector-wide
13 conversation. I'm here today to offer the idea that if
14 conceptualized well, risk-based certification could be part of
15 the solution to many of the sticky problems we face.

16 Residue testing? Risk assessment can illuminate when
17 and where resources are best spent on residue testing to reveal
18 fraud or other concerns. Grower groups? Maybe we can tailor
19 how we validate grower group compliance to focus on the unique
20 risks that that business type brings. Small and diverse
21 operations opting out of certification? If we're able to
22 reduce the administrative burden on lower-risk operations, we
23 can make certification more accessible to folks who
24 historically have viewed it as too burdensome or not for them.
25 Inspector and certification staff burnout? Let's empower

1 certifiers to focus qualified human resources on high-risk
2 situations and avoid burning out the people responsible for
3 protecting the system.

4 Now I'm not here saying a risk-based certification
5 will solve all of these problems. What I'm saying is it is a
6 critical lens through which we must look in order to solve the
7 problems. It will allow us to invest our limited resources
8 where they are most impactful, increasing capacity throughout
9 the system.

10 This will only work if we think critically about
11 risk, how we validate compliance, and how that could look
12 different across risk levels. To be clear, compliance will
13 always be validated and organic integrity always maintained,
14 but the tools used may differ. This is continuous improvement.

15 So what does this look like? ACA is standing up a
16 working group with the mandate of defining risk, building tools
17 to assess risk that can be used consistently but are flexible
18 and empower inspectors and certification staff to navigate
19 different vulnerabilities, creating a plan for updating those
20 tools as risks change, and getting brave in proposing how we
21 validate compliance for operations with different risk
22 profiles.

23 This could mean rethinking what record-keeping looks
24 like at different risk levels or what tools are best suited to
25 validate compliance in different situations. It could mean

1 relying on AI or other technology when appropriate. We'll be
2 happy to report out on our work at a future NOSB meeting.

3 I want to quickly mention one area where we will ask
4 for some real partnership from NOP. It will be hard for
5 certifiers to make this paradigm shift, especially when the
6 certifier's accreditation is on the line.

7 VICE CHAIR BRUCH: We trust that we will get feedback
8 from NOP on our efforts, and we are eager to partner with NOP
9 on trainings for inspectors, certification staff, and NOP
10 accreditation staff to ensure we're all aligned.

11 This is going to be a big change, and so many of us
12 are A student overachievers, and we're going to need to lean in
13 together to the discomfort of knowing when good enough is good
14 enough.

15 Thank you.

16 CHAIR SMITH: Thanks, Marni. Brian

17 BD. MEM. CALDWELL: Thanks, Marni. Just wondering,
18 do you think that certifiers will be able to, in some way,
19 change their fee scale so that higher risk operations would be
20 charged more?

21 MS. KARLIN: I think that's a great question. So I
22 think that that would be a question that we would work through
23 in this group, right? So I think that it's a conversation to
24 be had among the certifiers around, okay, what does this look
25 like, and how do we use our resources to best validate

1 compliance and think about that from a risk perspective? Part
2 of that may look like -- and I don't speak for any individual
3 certifier here, but I could imagine a proposal where part of
4 that could look like different fee structures for higher risk
5 versus lower risk. That's a conversation that's not up to me.
6 That's up to the certifiers and a conversation for them to
7 have.

8 MS. SMITH: I can talk a little bit about that when
9 we talk about this in the CACS discussion. I don't have a
10 question, but I do want to just really echo your comments and
11 say that I'm super pumped about this topic and really look
12 forward to partnering with ACA and the NOP. We've had the
13 privilege to talk with the Accreditation Division in the lead-
14 up to this discussion, and so, yeah, the collaboration is super
15 important. Thanks, Marni.

16 Sorry. I didn't see Amy's hand.

17 VICE CHAIR BRUCH: Marni, thanks for your time today.
18 You mentioned AI and technology. How long will the organic
19 program be without the integration of AI? Is it coming? Is it
20 coming soon? Do you know of companies that are already working
21 with that to improve surveillance, oversight, et cetera?

22 MS. KARLIN: It's a great -- it's a good question.
23 It's an area where, I will admit, I don't know a lot. I just
24 know that, gosh, couldn't we -- aren't there tools out there
25 that we could be using? Shouldn't we be thinking about all the

1 tools we have and all the risk levels and figuring out a way --
2 to echo what John Foster said, thinking about a way to ensure
3 that we have our instructors walking in prepared because maybe
4 they're doing what is the best, highest use of their wonderful
5 skill, right?

6 And so I don't have an answer to your question about
7 something's coming. I just think that when we put all of our
8 heads together to think about what could this new approach to
9 thinking about how our system works be, I think we would be
10 remiss if we didn't think about using all the tools that are
11 potentially in our toolbox. And so as much as AI sometimes
12 scares me, that's because I am a Luddite, and we should be
13 leaning into that and thinking about it.

14 Thank you.

15 CHAIR SMITH: Thanks, Marni. Thanks, guys.

16 Bill Wolf, then Milo Petruziello, and then Jaydee
17 Hanson.

18 MR. WOLF: Actually, that wouldn't have been a bad
19 first slide to introduce Oliver first because they're here.

20 Hi. I'm Bill Wolf, CEO of Wolf and Associates and
21 Second Star Farm. Thanks to every NOSB member for your great
22 work and a special shout out to the five retiring members.

23 Slide two. Oh, I'm in charge. Jeez, that's a new.
24 Ah, okay.

25 For 50 plus years, earthworms have guided my organic

1 farming practices and my mission to increase organic acreage
2 and sequestration of carbon for a healthier world. Obviously,
3 observing what they prefer has been my teacher. That passion
4 has led me to launch numerous organic businesses, non-profits,
5 and help hundreds of growers and handlers, and recently be
6 appointed to the Rodale Institute Board.

7 My worms didn't want to fly to this meeting. We
8 talked about that in the spring. Thankfully, local relatives
9 volunteered to be here. Please consider our many earthworm-
10 friendly written comments about sunset, essentiality, and the
11 national list. I'd be happy to answer any questions about
12 those. But today, comments are about risk-based residue
13 testing and inerts.

14 Risk-based scrutiny is basic to most inspection and
15 safety protocols and already a component of fraud prevention
16 and the organic system plants. If we target high-risk regions,
17 high-risk crops, trade channels, and bad actors with
18 unannounced inspections and focused sampling, we'll get the job
19 done. I especially appreciate that NOP, in their July 11th
20 announcement, plans to update guidance 2613. Thank you.

21 Regarding residue testing, I ask that you consider
22 the recommendations in our white paper on risk-based residue.
23 We need targeted sampling and less burden on farmers,
24 especially U.S. low-risk farmers that are constantly dealing
25 with uric contamination. Let's coordinate testing costs and

1 publish the results.

2 Finally, inerts, really carriers. The Materials
3 Committee proposal, I believe, moves this forward and solves
4 the current roadblock. Innovation needs to happen. We need to
5 get U.S. farmers the tools they need to compete with imports.
6 The options on list four don't provide those tools.

7 I recognize that this is not a perfect solution, but
8 it's time to move forward. The ideal solution would, in fact,
9 be complete transparency and disclosure. So it's urgent that
10 we collaborate to increase U.S. organic acreage, and thank you
11 very much.

12 CHAIR SMITH: Thanks, Bill. Questions?

13 Dilip?

14 BD. MEM. NANDWANI: No question. What's in the
15 buckets?

16 MR. WOLF: We have a collaboration. My earthworms
17 wouldn't fly. TSA would not give permission for them to be in
18 the cabin, and the last time they really didn't like being
19 shipped -- anyway. So we had a collaboration between two
20 consulting agencies, and Gwendolyn provided some earthworms
21 that originated on a biodynamic farm many years ago, and these
22 are related to Oliver. They're Oliver, the earthworm, at the
23 USDA Organic Garden, and they can speak up, so I brought them
24 as co-speakers.

25 BD. MEM. NANDWANI: Thanks, Bill.

1 CHAIR SMITH: Thank you so much, Bill. Appreciate
2 your time.

3 MR. WOLF: All right. Thank you.

4 CHAIR SMITH: Milo's up next, then Jaydee Hanson,
5 then Kendyl Meadows, and then we're going to take a break.
6 Milo, name and affiliation, and you can get started.

7 MR. PETRUZIELLO: Good afternoon. So I am Milo
8 Petruziello. I know it's a mouthful. I'm policy director at
9 Ohio Ecological Food and Farm Association. Our organic
10 certification program certifies about 1,100 farmers and food
11 processors in 12 states, and our policy work represents a broad
12 coalition of farmers, gardeners, and food advocates across Ohio
13 in our certification region. I appreciate the opportunity to
14 comment on behalf of our organization and our members.

15 So a few comments on crop insurance and inerts.
16 First, I would like to thank the NOSB for shining a light on
17 the critical need for an effective and accessible safety net
18 for organic farmers. The proposal reflects much of what we
19 have heard from the farmers we serve, and we appreciate the
20 Board taking the time to listen to them and address their
21 concerns.

22 Risk Management Agency's recent rule allowing organic
23 enterprise units is a win for transitioning grain farmers in
24 particular, and demonstrates that this Board's efforts are
25 already yielding real results. So we appreciate it. And

1 still, the proposal rightly points out there is much work to be
2 done, and we support the proposal and wish to highlight a few
3 key areas for improvement for RMA's consideration.

4 So purchasing crop insurance policy should be as
5 smooth for an organic farmer as it is for a conventional one.
6 Whole farm revenue protection needs further reforms to reduce
7 the paperwork burden on diversified producers and incentivize
8 agents to write policies.

9 We very much appreciate the goal of the transition
10 production plan. However, in its current form, it is nearly as
11 rigorous as NOSB and largely relies on open-ended questions.
12 Producers often need a lot of help filling out an OSP for the
13 first time, and the same will likely be true of a TPP.

14 This is a significant burden, considering low organic
15 T-yields remain a problem, as the proposal also rightly points
16 out. And transitioning producers do not yet benefit from the
17 organic premium. So we would ask that the TPP be simplified or
18 RMA accept a signed statement from a certifier or a TOPP-
19 approved mentor in lieu of a TPP or an OSP.

20 On the issue of inert ingredients in organic
21 pesticides, OFA strongly supports option one and thanks the
22 Board for including it. Inert ingredients should be listed
23 individually on the national list, just like any other
24 synthetic substance. OFA understands that this is the most
25 labor-intensive approach. We really do. However, we think

1 that grouping them by chemical type streamlines that review is
2 a sensible way to manage the workload, and we feel strongly
3 it's the only way to fulfill the requirements of OFA.

4 Most importantly, individually listing is the only
5 way to guarantee organic farmers and their customers the
6 transparency and safety they deserve and expect from the
7 organic label. Avoiding harmful synthetic pesticides is one of
8 the primary reasons most people buy organic. We believe that
9 the average organic consumer would be shocked to know that
10 synthetic inerts are included in organic pesticides with no
11 scrutiny. I genuinely certainly was. And allowing inerts in
12 pesticide formulations that are exempt from tolerance largely
13 maintains the current lack of transparency and risks public
14 trust in the organic that we cannot afford to lose.

15 We ask that the Board adopt option one and
16 demonstrate once again that organic is the gold standard for
17 protecting human health and the environment. Thank you. Thank
18 you so much for your service to the organic community and for
19 taking time to listen to my comments.

20 CHAIR SMITH: Thanks, Milo.

21 We have a question from Nate Powell-Palm.

22 BD. MEM. POWELL-PALM: Thanks for your comments,
23 Milo. Could you share how long it's taken your team to
24 complete one of these TPPs? I've had the privilege of offering
25 some technical assistance, and I find them to be just

1 BD. MEM. POWELL-PALM: All right. In your experience
2 with these producers, are they receiving direct technical
3 assistance? Is someone holding their hand while they fill it
4 out? Or are they sort of being turned out loose with the
5 forms?

6 MR. PETRUZIELLO: If they are receiving direct
7 technical assistance, if they know to ask for it. So, I mean,
8 certainly they can call an organization like OFA and receive
9 that technical assistance. We have people who will get on the
10 phone with them.

11 In a lot of cases, too, they're doing it between
12 other farmers. So we're very fortunate in Ohio that we have a
13 very robust network of farmers that support each other,
14 particularly the grain growers chapter of OFA is very, very
15 active and very, very supportive. So they are often getting
16 help, yes.

17 BD. MEM. POWELL-PALM: Thank you.

18 CHAIR SMITH: Nate Lewis.

19 SECRETARY LEWIS: Can I ask you about iodine and
20 metal phenolic oxalates or --

21 MR. PETRUZIELLO: I am really not the person to
22 answer that question for you.

23 SECRETARY LEWIS: Okay. I regret not having asked it
24 in the webinar. But I'll let your written comments stand and
25 I'll reference them for our work.

1 Thank you.

2 MR. PETRUZIELLO: Thank you. Yeah, we write those as
3 a team. So that's not my area of expertise.

4 CHAIR SMITH: Thanks so much, Milo. Appreciate your
5 time.

6 MR. PETRUZIELLO: Thank you.

7 CHAIR SMITH: Jaydee Hanson. Oh, there you are. I
8 didn't see you on the on-deck chair. I was looking for you out
9 there, but you were blocked by the podium, so. And then up
10 next is Kendyl Meadows.

11 MR. HANSON: Jaydee Hanson, Policy Director at the
12 Center for Food Safety. Speaking quickly on three topics.
13 First is compost.

14 We have serious reservations, strongly disagree with
15 the allowance of so-called compostable packaging as an organic
16 feedstock. The current ASTM standards do not require that
17 compostable materials be broken down into the basic components,
18 just that 90 percent are broken down into smaller sizes. The
19 issues of microplastics and now nanoplastics are just starting
20 to come to the forefront of environmental considerations, and
21 the NOSB and NOP must not allow for these synthetic plastics to
22 be intentionally added to organic compost.

23 We also must know about which plasticizers are used
24 in the plastics and whether compostable packaging contains
25 PFAS, orthophthalates, and bisphenols, whether added

1 intentionally or not. These chemicals have negative
2 implications for human environmental health. You've heard me
3 talk at other meetings about PFAS. I will fast forward about
4 that.

5 But we have the experience of farmers in Maine and
6 other places that can't grow because their compost was
7 contaminated with PFAS. We don't want anything that encourages
8 more of that.

9 Inert chemicals. The Center for Food Safety believes
10 that without individual review of each chemical in a pesticide,
11 there is no way to fulfill the OFRA criteria of evaluating
12 synthetic substances for their effects on the environment,
13 human health, or for their necessity to an organic production.
14 Moreover, the EPA's limited review process for inerts is far
15 weaker than even its flawed process for evaluating active
16 ingredients.

17 EPA inert regulation is an ad hoc affair with no
18 standard data requirements. Entire classes of inerts are
19 approved based on arbitrary limited data for just a few. EPA
20 often relies on guesstimates of inert toxicity.

21 The Center for Food Safety has had a damn hard time
22 getting responses to our FOIA request about EPA's work on
23 inerts, and we just had to turn down and we'll have to sue to
24 get our FOIA request on inerts answered by the EPA so we're not
25 --

1 That's my time.

2 CHAIR SMITH: Goes quick.

3 MR. HANSON: Well, thank you very much.

4 CHAIR SMITH: Questions for Jaydee?

5 I see Amy and then Allison. Go ahead, Amy.

6 VICE CHAIR BRUCH: Jaydee, thanks for your time today
7 and all the comments you submitted via the written format.

8 You mentioned farmer challenges with PFAS and some of
9 the areas and growers that you know are taking production out
10 of circulation right now.

11 MR. HANSON: Well, they've been told by the
12 Department of Agriculture and their states to take it out of
13 production.

14 VICE CHAIR BRUCH: Okay. And we're familiar with
15 Maine. I've heard of areas in Texas. Are there any other
16 known hot spots for PFAS contamination that you know of?

17 MR. HANSON: I think we're going to see hot spots any
18 place that we have been for a long time disposing of our
19 compost on farmland. Even in my home state. Now, the home
20 state of Virginia doesn't allow using sludge on farmland, but
21 they allow it on forestry land right next to that farmland.
22 And so it's going to end up pretty much in every state is my
23 personal opinion. I can't prove that without testing, but we
24 have not been excluding all of these PFAS substances from
25 sludge for a long time.

1 VICE CHAIR BRUCH: Thank you.

2 CHAIR SMITH: Allison?

3 BD. MEM. JOHNSON: Thanks for your comments, Jaydee.
4 I know you all have done a lot of work on inerts and trying to
5 get stronger oversight from EPA and so I'm curious if you think
6 there are any categories of inerts where we could defer to EPA
7 as far as meeting off that criteria.

8 MR. HANSON: Well, I think one of the things that NOP
9 could do is push the EPA for better disclosure of -- you know,
10 I mean, when we finally do get stuff back from the EPA, it's
11 often entirely redacted. And, you know, Europe doesn't allow
12 this. If you've got human health effects or environmental
13 health effects, you have to disclose it and explain. And I
14 think that, you know, I hope whatever administration we have
15 next will push the EPA to get off of this excessive
16 confidential business information and let the people know what
17 they're getting.

18 CHAIR SMITH: All right. Brian?

19 BD. MEM. CALDWELL: Jaydee, thank you for your
20 excellent work over so many years. Really, really wonderful
21 work.

22 I just wanted to ask you, you mentioned that you
23 thought that hot spots might be where compost was applied, but
24 I was wondering if you meant, like, biosolids or sewage sludge
25 or whether you think --

1 MR. HANSON: I meant sewage sludge.

2 BD. MEM. CALDWELL: Okay. Thank you.

3 CHAIR SMITH: Thanks for that clarification. I don't
4 see any other hands. Thanks for your time, Jaydee.

5 MR. HANSON: Well, thank you very much. I had a
6 little bit on induced genesis, but I will spare that. You have
7 it in writing.

8 CHAIR SMITH: Thank you.

9 Up next is Kendyl, and then we'll take a break.

10 Kendyl, name and affiliation, and you can get
11 started.

12 MS. MEADOWS: Kendyl Meadows, Three Creeks Produce in
13 Columbus, Ohio.

14 First, thank you to the Board. I'm honored and
15 grateful that the Ohio Ecological Food and Farm Association
16 prioritized bringing farmers to this meeting, and I'd also like
17 to thank my outstanding crew for holding down our farm during
18 one of the most busy times of the year so that I could be here.

19 My spouse and I are first generation, early career
20 growers. We grow seven acres of diversified organic
21 vegetables, and again, we are proudly certified organic.
22 Somewhat uniquely, we primarily serve wholesale customers who
23 have really high expectations for volume and quality. We rely
24 on vetted seed varieties that have the characteristics that are
25 important to our buyers and perform well in our systems and in

1 our climate. Seed varieties are very much not interchangeable,
2 and on a compact and highly diversified farm, each and every
3 seed matters. I've grown dispirited by some of the
4 characterizations of the commercial availability provision as a
5 loophole. I can't speak to the motivations or intents of
6 others, but my preference is always for organic seed, and
7 despite this prioritization for sourcing and trialing organic
8 varieties, we still find that we are purchasing a significant
9 amount of conventionally produced untreated seed.

10 In fact, my records do indicate that our seed
11 purchasing has plateaued, as has been the claim from folks
12 present at this meeting, but I would posit that the plateauing
13 effect is a result of the gaps in the seed marketplace and not
14 its cause.

15 Organic seed production should indeed be a priority,
16 and I acknowledge its unique risks and challenges, but it's
17 precisely those challenges that make it even more apparent to
18 me that a commercial availability provision for seed is not a
19 loophole, but rather an essential and sensible compromise that
20 allows me to remain viable, meet my market need when I lack the
21 significant influence on purchasing or demand of seed.

22 I fear that further restricting our seed options
23 could have the unintended impact of less organic production,
24 crops, or even producers. I understand that the Board needs to
25 address this important issue with its established scope and

1 tools, but even if a change in the standards or its enforcement
2 would have the intended positive impact on organic seed demand
3 in the long term, I am a bit uneasy putting certifiers in a
4 potential role of determining what would constitute commercial
5 availability adequately, how they would judge and measure
6 opaque concepts like continuous improvement, how that would be
7 fairly measured, or for anyone else to judge what threshold of
8 yield loss or any other performance expectation should be
9 acceptable to replace one of my favorite varieties.

10 A speaker referenced some pain to start in change to
11 this area, and while I'd welcome that change, I am also someone
12 who would acutely feel that pain. I want to encourage the NOSB
13 to consider centering and considering the needs of organic
14 producers and small ones when determining a path forward.

15 Thank you.

16 CHAIR SMITH: Thank you. Stay put, Kendyl. You've
17 got a couple questions.

18 MS. MEADOWS: Sorry.

19 CHAIR SMITH: That's okay. Not off the hot seat just
20 yet. Nate Powell-Palm.

21 BD. MEM. POWELL-PALM: We, for a long time, while
22 I've been on the Board, have discussed the purpose of in-person
23 public comments, and I just wanted to give a huge shout out to
24 OFA for bringing you here, and thank you for being here. This
25 is exactly what we were hoping would happen with bringing in-

1 person public comments back.

2 With this seed discussion, I really appreciate your
3 perspective. It's very unique from what we've heard throughout
4 the time we've spent with this topic. Could you speak a little
5 bit to what you see as being the catalyst that will help you
6 grow your business, and I haven't heard from very many farmers
7 saying what tightening the regulations around organic seed
8 would actually do for them. I was wondering if you could speak
9 to that, please.

10 MS. MEADOWS: It would be great to have a complete
11 start-to-finish, seed-to-sale organic supply chain. I would
12 welcome that. I hope that is in our future.

13 In the interim, though, I guess what I would say is,
14 especially as a small producer, I have very limited impact on
15 -- I'm very much at the mercy of a dynamic seed market. I
16 can't really call an order from producers directly. I have to
17 work with seed companies. They face a variety of
18 complications. And in the specialty vegetable market, which is
19 already a unique, multifaceted market, every region and every
20 farm has specific growing conditions and needs.

21 It seems impossible, and I know that it isn't, but I
22 can't really perhaps market demand really would come from a
23 change to the regulation, and I hope that it would if that's
24 the route that's taken. But as for me, I just feel like it
25 would be -- I would be faced with not meeting customer demands

1 for certain crops or choosing not to be certified so that I can
2 remain a producer for them.

3 BD. MEM. POWELL-PALM: Kyla, if I may follow up, just
4 one quick thing.

5 MS. MEADOWS: Sorry, that was a long answer.

6 BD. MEM. POWELL-PALM: No, your last point was very
7 salient there. What good does strengthening the organic seed
8 rule do for you as a farmer?

9 MS. MEADOWS: Well, if I weren't ideologically
10 aligned with farming organically, I would be doing something
11 else. And so the more farms and producers there are, that is a
12 priority for me environmentally, socially, and otherwise. Seed
13 producers are part of that.

14 So as a vegetable farmer, I would hope that I would
15 benefit from high-quality seed produced by these folks, but I
16 also really want to support them in what they do. But for me
17 and my business as it is currently, our competition really is
18 huge -- well, our competition is we don't have the direct
19 customer interactions at a farmer's market where I can say,
20 well, our kale looks a little different than you're used to or
21 whatever. My buyers often never meet me. They see what comes
22 in the box. And I have to meet that or I wouldn't be their
23 customer -- or their producer, rather.

24 Did I answer that?

25 BD. MEM. POWELL-PALM: Yeah, yeah. Thank you so

1 much.

2 MS. MEADOWS: All right.

3 CHAIR SMITH: Couple more?

4 MS. MEADOWS: Sure.

5 CHAIR SMITH: Amy?

6 VICE CHAIR BRUCH: Kendyl, thank you for joining us
7 so much today. Your voice is really important in this
8 conversation about seed. But I wanted to kind of switch gears
9 a little bit to a macro level on risk-based certification.
10 We've heard from Dr. Tucker today that SOE was supposed to make
11 sound and sensible changes for small producers. I know you
12 said you're a smaller producer, seven acres of vegetables.
13 That sounds pretty big. I just wanted a little bit of insight
14 in your operation. You're diversified.

15 How many seed options are you putting in your OSP?
16 How many varieties?

17 MS. MEADOWS: Well, actually, I was wondering if I
18 would get this question. So I look back in our records, which
19 we do have detailed records, thanks to the existing provisions
20 of the rule. I provide those to our certifier. I can think of
21 up to five ways to measure -- how you measure our seed, whether
22 that's number of seeds, dollar value of seed purchased, dollar
23 value of produce sales. So that's kind of a difficult
24 question. So there are about 89 entries on my spreadsheet of
25 the seeds I purchased this year.

1 VICE CHAIR BRUCH: That's a lot. And just one other
2 question real quick. The time it takes for you to fill out
3 your organic system plan, what percentage of that time is
4 geared towards one of those seed categories?

5 MS. MEADOWS: I must admit, my spouse formerly worked
6 in organic certification, so he handles our OSP.

7 But because we entered into farming with what was
8 expected of us, we had a little bit of an advantage there, so
9 we were able to keep detailed records from the beginning. And
10 our process for shopping for seeds is kind of designed around
11 what we would need to provide to our certifier.

12 We make our crop plan very well in advance, up to a
13 year in advance in some time, some occasions, and we sit there
14 no later than January with three computers open with our seed
15 companies that we work with, and we narrow it down. We're
16 like, okay, we need this variety. Who's got it? Organic
17 first. If not, we go down the line up to five seed companies.

18 So we are trying, and we trial organic varieties
19 every year in multiple crops, sometimes at the invitation of
20 the seed companies we work with, and it still isn't enough.

21 VICE CHAIR BRUCH: Thank you.

22 CHAIR SMITH: Allison?

23 BD. MEM. JOHNSON: Kendyl, thank you so much for
24 being here, and I appreciate you drawing our attention to the
25 language that we're using. I don't think any of us intend to

1 imply that producers aren't doing their diligence and caring
2 about sourcing organic seed. I think the vast majority of
3 operations are doing the best they can in this incomplete
4 market.

5 So as we look forward to how we can grow the options
6 that are available to you, I'm curious to hear a little bit
7 more about what would help you. It sounds like in the
8 wholesale market, your buyers are playing a significant role in
9 what you can sell, so you may have ideas about what role
10 upstream players play here, and then anything else that would
11 help you try more types of seed, experiment, identify
12 equivalent varieties. I'd just love to hear any ideas you have
13 for what could be helpful to you.

14 MS. MEADOWS: Can I answer that in two parts? It's
15 actually a concern of mine that I didn't raise specifically,
16 but that I do have, is the ability to try new varieties and
17 explore other things if we have a stricter provision that the
18 seed we use must be certified organic. I'm proudly
19 representing the radicchio market and the chicory market on my
20 water bottle here. We are one of the larger radicchio
21 producers in our state, which is odd, but everyone knows that
22 it would be crazy to grow radicchio there, so -- but we do.

23 But a lot of these varieties are developed and
24 culturally significant in Europe and being brought over.
25 They're not likely -- these unique varieties that we're trying

1 and exploring aren't likely to be certified organic when we try
2 them, at least at that point.

3 So I do want to recognize that there might be
4 restrictions on innovation and trying new things on growers.
5 I'm so sorry. Can you remind me of the first part of your
6 question?

7 BD. MEM. JOHNSON: What other tools might help you?

8 MS. MEADOWS: Thank you. I'm easy, I feel like.
9 What I would like to see is help to seed producers and seed
10 companies to alleviate the significant financial risk that it
11 takes to develop seeds and bring them to market. As far as
12 that goes, I mean, alleviating risk most often translates to
13 money. Functionally. So whether that's in the form of, you
14 know, modified crop insurance options in the case of a crop
15 failure for those seed producers, grants for development, or
16 some acknowledgement on the behalf of seed companies, that
17 would be difficult, I understand, to bring unique varieties to
18 market available organically.

19 CHAIR SMITH: Brian?

20 BD. MEM. CALDWELL: Kendyl, thanks for coming all the
21 way here from Ohio. Just quickly, a couple things. When
22 you're worried about sort of restricting options that you're
23 talking about, you can't maybe trial a new variety if it's not
24 available organic, if certain rules come into effect. Is that
25 what you're saying?

1 MS. MEADOWS: It depends, but I think it could, which
2 is my concern.

3 BD. MEM. CALDWELL: Okay. And you commonly trial new
4 varieties? Yeah. Okay, good.

5 Yeah, I was a small-scale market earner for many
6 years before, so I know all about wanting that really prime
7 variety for that one crop. Just wondering, any specific crops
8 that are either easier or harder to find organic seed in?

9 MS. MEADOWS: Sure. The high-performing hybrid
10 varieties are often hard. Carrots are a tough one. Brassicas
11 are a tough one. And the toughest one for us, our largest crop
12 dollars and seed purchase is curly kale, which there are lots
13 of organic curly kales in the market, so you might think,
14 what's our deal? But the one we grow is significantly more
15 productive on our farm than other varieties, and we trial new
16 ones every year.

17 BD. MEM. CALDWELL: Thank you very much.

18 CHAIR SMITH: Thanks so much for your time. Really
19 appreciate you making the trip.

20 MS. MEADOWS: Thanks everybody.

21 CHAIR SMITH: Okay, guys, break time. We're going to
22 come back at 4:10, so that's nine minutes.

23 (Off the record at 4:00 p.m.)

24 (On the record at 4:11 p.m.)

25 CHAIR SMITH: Okay, guys, please take your seats.

1 We've got a reception to get to.

2 So I'm just going to run down the queue since I
3 failed to say that before the break. So Michael Crotser is
4 going to be coming to the podium, then Phil LaRocca is up next,
5 and then Scott Rice.

6 Also, as I said, we have a reception to get to
7 tonight. I gave some of that information earlier. There are
8 flyers now taped on the back of the door. Thanks, Mike Dill.
9 If you guys need to take a snapshot, it has the information,
10 the address, and what have you. So that's how to get yourself
11 to the reception tonight. Again, I think it starts at 6:30.

12 Okay. Mike, you are there and ready. Name and
13 affiliation, and you can get started.

14 MR. CROTSEY: I'm Mike Crotser. I'm the
15 certification director at CROPP Cooperative. We appreciate the
16 work of the NOSP and the NOP to support organic agriculture.
17 Thank you for the opportunity to speak today.

18 Before I begin, I want to take a moment and thank all
19 the accredited certifiers. It's been a period of change, and I
20 want to acknowledge the increased expectations of certifiers.
21 This work includes the organic livestock and poultry, origin of
22 livestock, and strengthening of organic enforcement standards.
23 It's your work that's essential to bring our farmers' products
24 to market.

25 My first comment will be on residue testing. We

1 appreciate the Board's work for continued improvement for the
2 NOP's residue testing program. Ensuring the organic integrity
3 of our supply chain is essential, and the residue testing
4 program is critical at protecting our market.

5 We support a targeted approach to improve the
6 program's efficacy. Assembling account comprehensive risk
7 assessment tool and testing program would serve the industry
8 well. This would include identifying at-risk prohibited
9 materials by reviewing and summarizing findings from the USDA
10 Pesticide Data Program and the collective work of certifiers.

11 Now that operations must have a fraud prevention
12 plan, additional risks could be identified by private industry.
13 The goal should be to test for fraud where fraud exists, then
14 augment that testing for lower-risk crops. Although progress
15 has been made, it seems like the certifiers and the NOP are not
16 readily sharing information about the root cause of positive
17 tests. Sharing information could yield basic information such
18 as: are positive test results associated with the failure of an
19 organic system plan, environmental contamination, or fraudulent
20 activities.

21 My next comment will be about iodine and the proposed
22 annotation change. Our business will need time to process this
23 proposed change and to determine the impact on our business.
24 We feel certifiers are also sorting this out. One certifier
25 well-versed in livestock materials reached out to us to

1 understand the context of APEs and teat dips and disinfectants.
2 We were unable to help.

3 To our knowledge, the organic industry has not been
4 asking if APEs are present in teat dips. CROPP already
5 prohibits the use of NPEs in livestock products. NPE-free
6 products are readily available. Being said, CROPP as a
7 business does not test or monitor for APEs in the same manner
8 which we have for NPEs.

9 One major manufacturer told us that if a product is
10 labeled as NPE-free, it will also not contain APEs. And
11 another manufacturer confirmed that NPEs are not available in
12 their teat dips but did not provide input on APEs. Reasoning
13 for the inputs is that we just didn't have time before this
14 meeting. More APE research and information should be gathered
15 and understood before there is an annotation prohibiting its
16 use.

17 CHAIR SMITH: Thanks, Mike. Questions? Nate?

18 SECRETARY LEWIS: Can I just clarify that one of the
19 manufacturers said if it says NPE, that also means APE-free?

20 MR. CROTSEY: Right. If a product is labeled as NPE-
21 free, it also includes APEs.

22 SECRETARY LEWIS: Okay. Thanks.

23 CHAIR SMITH: I'm going to call myself.

24 Thanks for your comments on risk-based certification.
25 I think that there's some good connection here between this

1 work agenda item and what we've been hearing about final rule
2 implementation. And so, you know, you work with a lot of
3 growers of all -- or producers of all different sizes. And so
4 I'm just wondering if you have heard -- I know you mentioned in
5 your written comments, like, paperwork burden. But if there
6 was, like, anything more specific of, like, what would be, you
7 know, most beneficial to them in this concept of risk-based
8 certification and in particular sort of rule rollout and how
9 that could look better.

10 MR. CROTSER: Yeah, that's a good question. We have
11 roughly 1,700 farms. I think about 40 percent are from the
12 plain community. We've got a couple of seasoned certification
13 specialists who were at accredited certifiers before coming
14 into the business.

15 And the big thing that we're telling these, you know,
16 our members, farmer members, is don't freak out about a fraud
17 prevention plan. You essentially have a lot of those pieces
18 already there. And when they get the modulars or the forms to
19 fill out from certifiers, they just really don't know what to
20 do. And their supply chains are relatively simple. They're
21 straightforward. You don't have to go out and create work on a
22 fraud prevention plan. And we've been typically telling our
23 producers, see how your annual inspection goes.

24 This is new for certifiers, right? They're getting
25 their feet wet in this, too. And we didn't have any

1 expectation of certifiers coming in hard on having a robust
2 fraud prevention plan and letting producers ease into it.

3 CHAIR SMITH: Thanks. I don't see anybody else.
4 Thanks, Mike.

5 MR. CROTSEY: Thank you.

6 CHAIR SMITH: Up next is Phil LaRocca, followed by
7 Scott Rice, and then Tom Chapman.

8 MR. LARocca: Good afternoon. My name is Phil
9 LaRocca, a long-time organic farmer, a long-time organic
10 processor. I sit present as a member of the California Organic
11 Product Advisory Board, and I am the chairman of the Board of
12 directors for CCOF.

13 Thank you for your patience and your time, and thank
14 you for the opportunity to do oral comments. I was running a
15 little late. I'm over 70 and never passed up a bathroom, so
16 here I am now.

17 A couple topics. My first one is inerts. So I was
18 around in the very, very early days of the formulation of the
19 NOP, and inerts was a big topic. We tossed it around a lot,
20 and the bottom line was NOP is young. It was the first time
21 all the certifiers were getting together under one seal. The
22 industry was confused, so we lifted up the carpet and we
23 brushed them under the table and said, one of these days we'll
24 have to deal with it.

25 Well, here we are. People are talking about it now,

1 which means the industry wants to know what's going on with
2 these inerts. We have to remember that the backbone of organic
3 industry is integrity. So if the industry and the people,
4 culture, want to know what inerts are about, it's time that we
5 looked at and take a deep look at what these inerts are all
6 about. This is not going to be easy, as it wasn't easy back
7 20-some-odd years ago. It's not going to be easy now, but the
8 fact is it needs to be done.

9 My second topic I want to deal with is cost share and
10 beyond. So cost share. You know, it's a little bit absurd
11 that we're struggling for \$750 and we're a multi-billion dollar
12 industry. It actually hurts me that I have to deal with this
13 issue. Just recently, with the State of California, I did a
14 tour of some of our organic farms, and we did three farms. Two
15 were pretty large, 1,500 acres and bigger. We talked about
16 cost share. They basically said it's ridiculous for us to
17 spend this much time for \$750. What about \$3,000? For \$3,000,
18 we could spend the time.

19 So we need to look at this. We need to help our
20 organic farmers out. We're all hanging in there the best we
21 can, and \$750, quite frankly, is embarrassing. We were at
22 \$1,500 and it got lowered. I think the number should be at
23 3,000.

24 Now, since we're on the topic of money, I'm going to
25 really throw something out at you. I think that certified

1 organic farmers should be subsidized. At first, I thought this
2 was kind of a unique idea until yesterday at the NOC meeting
3 when some of our seed growers came up and said, we can do a lot
4 better if we were subsidized. So there it is. We have farms.
5 We've subsidized a lot of farms. And I'm pro-subsidy because
6 farming is really a tough job. You go up against a lot of
7 stuff. We need help.

8 I have rice grower friends who, if it wasn't for the
9 subsidy, they flat couldn't make it. They just come out and
10 say. So here we are. We subsidize grain crops. It's
11 fabulous. I'm all for it.

12 Man, I'm from California where we're the leader in
13 organic and conventional produce, and they call it specialty
14 crops. It should be called necessity crops, and there's
15 nothing better than an organic necessity crop.

16 I ran out of time.

17 CHAIR SMITH: Thanks, Phil. Questions?

18 MR. LARocca: Thank you.

19 CHAIR SMITH: I don't see anybody. Thanks, Phil.

20 Okay. Scott Rice, you're up. Then Tom Chapman.

21 Then Steve Ela.

22 MR. RICE: Good afternoon. My name is Scott Rice.
23 I'm the Senior Director of Regulatory Affairs at the Organic
24 Trade Association, and I also serve on the Board of Directors
25 of the Organic Materials Review Institute.

1 As the leading voice for organic trade in the U.S.,
2 OTA's mission is to grow and protect organic with a unifying
3 voice that serves and engages its diverse members from farm to
4 marketplace. OTA offered written comments on a slate of topics
5 on behalf of our members, and rather than try and highlight
6 these in these three minutes, I'm happy to answer any specific
7 questions you may have on these in a little over two minutes
8 from now.

9 As I thought about what I wanted to share with you
10 today, I looked back on my own time on the Board and the
11 comments that brought value and insight to my decision-making.
12 Some of the most beneficial speakers and comments answered the
13 granular details of thorny technical topics. Others
14 capitalized on the power of firsthand stories and experience to
15 illustrate a point of view or need. It is the latter that I
16 draw on today.

17 I've been able to visit many farms over the years and
18 see for myself the challenges producers face, the tools they
19 rely on, the ingenuity they employ. As we often hear, weeds
20 are one of the greatest challenges, and even with the amazing
21 ingenuity of timing or density of plantings and calculated
22 cultivations, plastic mulch still stands as one of the best
23 tools to control weeds. And while the standards require the
24 removal of plastic mulch at the end of the season, weather,
25 exposure, and the practicalities of farm machinery and movement

1 in the field see some of this degrade before it can be removed.

2 Despite farmers' best efforts, I see more plastic
3 fragments than I care to admit, and it pains me that there is
4 still no alternative available. While we may be uncomfortable
5 with some biodegradable synthetics, we must ask to what degree
6 are we comfortable with the continued use of non-biodegradable
7 or non-compostable plastics and synthetic microplastics that
8 don't break down at all.

9 Perfect solutions are rare, and tradeoff decisions
10 must be made in the context of real-world challenges. I will
11 note this is not the producer's problem alone. It is no secret
12 that plastic proliferates in the products we reach for at the
13 grocery too. Much thought and work is underway in that sector
14 of the industry as well.

15 But we have an opportunity to take a fresh look and
16 position organic as a leader in reducing plastic. With a
17 response to NOP's 2023 memo to the Board on biodegradable bio-
18 based mulch film, requested at or before spring 2025, and the
19 question of whether or how many synthetic degradable substances
20 should be allowed in organic compost, I encourage the Board to
21 take the opportunity to challenge itself to explore some of
22 these tradeoffs and the impact of not engaging in efforts to
23 reduce reliance on conventional plastics.

24 I believe we can find a balanced solution that
25 safeguards our soil, water, our health, provides growers the

1 tools they need, and upholds the trust and faith consumers have
2 in the organic label. To all of you, thank you for your
3 concerted and thoughtful effort on this, and all the issues
4 before you, and especially to the five who see their free time
5 returning on the horizon, a big thanks to your service in the
6 organic community.

7 CHAIR SMITH: Thanks, Scott. A question from Wood.

8 BD. MEM. TURNER: Scott, I think I've landed at a
9 place where I feel like the plastics that I can see are better
10 to manage, easier for me to manage than the plastics I can't
11 see. Tell me I'm wrong about that.

12 MR. RICE: I wouldn't say you're wrong. I would say
13 if there are plastics that we can be comfortable with that
14 biodegrade in a way that we're not just making a quarter of a
15 quarter of a quarter of a quarter and having a degradability
16 that is just not making microplastics, then I would say that is
17 a win over the conventional plastics that we see, as I said,
18 despite our best efforts getting incorporated into the soil and
19 are turning into microplastics.

20 You know, we did a lot of work on the Board when I
21 was where you are and hearing from experts, talking about the
22 options available then. That is, I mean, five to ten years ago
23 now. As Kyla says, she's a year from her end. You have five
24 members coming on and another five after that. You have this
25 biodegradable, biobased mulch film coming back for a sunset

1 review in the not too distant future. I would say get another
2 expert panel, review what we looked at even then, and look if
3 there's been innovation where we can feel comfortable with
4 something that gets us beyond that reliance on the conventional
5 plastics.

6 CHAIR SMITH: Nate Lewis?

7 SECRETARY LEWIS: I'm just trying to figure out how
8 to formulate this question, but it seems to me that in my
9 observation of this plastics discussion, we've looked at
10 synthetic plastics, or they're all synthetic, but we looked at
11 petroleum-based -- they're all petroleum-based -- we looked at
12 non-biodegradable plastics and biodegradable plastics in a
13 vacuum or individually. We haven't looked at them within the
14 context of the crop weed management rule, which governs all
15 weed management before you get to nationalist items.

16 And one of the problems I see is that mulch is not
17 one of those things that you get to use when everything else
18 fails. It's part of what you get to use before you get to use
19 the things on the national list. And I'm just curious from
20 your experience that if we discussed all of that in one big
21 conversation related to 205-206, do you think we would have
22 more productive outcomes? Is that a good way to tee up this
23 conversation in light of what you pointed out, that bio-based
24 mulch film is coming back for a sunset review and the program's
25 actually asked us to look at that? I'm just trying to not

1 repeat history and try to come up with a different outcome and
2 wondering if some context could be helpful there.

3 MR. RICE: Yeah, I think any fresh idea on this is
4 welcome, right? I don't encourage anyone to go down the same
5 road again, but with five new people and five more, and I think
6 you have to go down that road again a little bit, or all of you
7 do. And I think that there's a lot of good work being done on
8 this in field trials, in the folks that are manufacturing it.
9 I won't be surprised if an expert panel shows, you know, other
10 alternatives that have come up in the interim time.

11 So any idea is a good idea on this, I think, if we
12 can move beyond the conventional plastics.

13 CHAIR SMITH: Jerry, I saw your hand up. Do you
14 still have a question?

15 BD. MEM. D'AMORE: Yes, I do. Thank you.

16 Scott, you and I had a couple moments to talk during
17 the break or after lunch, and you listened to me kindly, so I'm
18 going to repeat myself.

19 MR. RICE: I can always listen again, Jerry.

20 BD. MEM. D'AMORE: Yeah, you're wonderful, but I've
21 got to get it out to the rest of this crew, too. There's
22 probably nothing in my five years that's disturbed me more than
23 the topic we have right now. And when I look at it, it isn't
24 an acre being covered by a single layer of plastic. It's an
25 acre that's being covered by a layer of plastic that's then

1 fumigants put under it. That's the first one. And then that
2 comes off, and then there's the bedding up of the crop, and
3 that's another full acre worth of plastic. And then if you're
4 in some of the crops, such as raspberries and blackberries,
5 then you put on a layer of plastic over it in a tunnel. So,
6 you know, this problem isn't a one-on-one as I see it. It's
7 frequently one-on-three.

8 And I was going to use Wood's phrase and say, please
9 tell me I'm wrong. As I've looked at it and I've listened to
10 us debate it, I just don't think we're the right people to do
11 this, and I'll tell you why. That means the NOP, this organic
12 group that we all love and are a part of, and that's because
13 we're a 3 percent footprint on -- and conventional's got the
14 other 97 percent. And I just don't think we can move the
15 needle.

16 And I think when we spend a lot of time on it, that
17 we're actually giving other folks the opportunity to say, oh,
18 don't worry about it, organic is handling it. I don't think
19 we're going to get industry to move. And I think that if we
20 say, okay, we'll get our organic folks to do it, I'm deathly
21 afraid that we'd put organic folks out of business, because the
22 alternative, in my mind, couldn't possibly be as cheap as
23 what's going on out there now.

24 So my question to the community is, should we say to
25 ourselves that this has got to be handled by somebody that has

1 greater chops in this arena than we do?

2 MR. RICE: Fair question for sure. We still
3 represent a small percentage of overall ag, no debating that,
4 but I think we are also a pretty dynamic group of innovators,
5 and we have done things that people said we never would have
6 been able to do. The fact that we are a \$70 billion industry
7 now was unheard of when we first started out as rabble-rousers
8 and hippie dirt farmers.

9 And so I think you have a -- we're taken seriously.
10 I think the consumers take us seriously. They take the label
11 seriously. And whether we like it or not, that consumer base
12 looks to us to be that gold standard. We can't be that gold
13 standard for everything, but we also know that we are using as
14 an industry as much plastic as conventional, and if we can show
15 a way forward that shows an alternative to that, I think that
16 only adds to the value of our brand.

17 BD. MEM. D'AMORE: I agree with everything you said.
18 I would like to get one more group in there that would play
19 with us, and that's the manufacturer, and I don't believe that
20 at a 3 percent footprint. Thank you.

21 MR. RICE: Sure.

22 CHAIR SMITH: Thanks, Scott.

23 Up next is Tom Chapman, followed by Steve Ela, and
24 then Brian Baker.

25 MR. CHAPMAN: Good afternoon, everybody. Tom

1 Chapman, co-CEO of the Organic Trade Association, long-time
2 listener, first-time commenter, so please give me some grace as
3 I get used to this 3-minute box. Three minutes.

4 We have a trifecta here of 2017 to 2019 NOSB alumni.
5 I'm both honored and humbled. Honored to be the meat in the
6 alumni sandwich, following Scott and being followed by Steve.
7 Humbled to follow and be followed by two very dedicated organic
8 advocates that I know very well.

9 The three of us know more than most the burden of
10 service, not just from being away from our farms, families, and
11 work, but being asked to pick up the mantle of trying to
12 represent all of agriculture, food, related businesses, as well
13 as the environment, consumers, and other interests. It takes a
14 lot, and I thank you all for your service.

15 I'm happy to respond to any additional questions that
16 the Board may have on OTA's comments to the best of my
17 abilities, but with my jokes now filed, I want to turn to my
18 favorite topic, which is perspective.

19 4676, do you all know what that number represents?
20 Well, of course, the 2900th anniversary of America's
21 independence. It's also the date that we would get to 80
22 percent organic agricultural land in America at our current
23 growth rate. Can we wait until 4676?

24 We have some complex issues to manage: fraud, the
25 burden of certification, appropriate government support for

1 organic, consumer education, and many, many more topics. I ask
2 you to keep this number in mind when you make decisions. Will
3 those decisions accelerate or decelerate that date when organic
4 becomes the foundation of American agriculture?

5 My second comment is also on perspective, but
6 commingled with process. I like my math. 110,108 words,
7 that's the number of words in the full meeting packet. Google
8 tells me it would take 7.2 hours to read all of that. If we
9 wanted 20 percent of the 27,000 U.S. operators to respond and
10 comment into the National Organic Standards Board, that's the
11 equivalent of 19 full-time jobs. 117 questions, that's the
12 number of questions I counted in the packet, five minutes per
13 question. I think a very conservative estimate of the amount
14 of time it takes to respond to a question. 20 percent of
15 27,000 operations, 52,000 hours, 26 full-time jobs.

16 We're nowhere near 20 percent of operators commenting
17 here. I think we've been very thankful of the folks that we do
18 have come and speak and provide written comments to the Board.
19 I know they were very valuable when I was on the Board. But we
20 need to increase this accessibility.

21 A simple start to consider, an executive summary,
22 perhaps, with it broken out by scope or segment, as well as a
23 summary of questions. But I ask you all to really consider the
24 experience of your community, of the farmers, of the small
25 businesses, of the big businesses and the stakeholders that all

1 want to support you in this important process. So thank you
2 again. Apparently I have 35 seconds to stand up here in
3 silence.

4 CHAIR SMITH: Just kidding. Any questions for Tom?
5 Allison.

6 BD. MEM. JOHNSON: Thank you, Tom. I really
7 appreciate the attachment of numbers, so the pain of going
8 through this agenda and packet. And I also think there's some
9 places where we could have said more.

10 So I'd like to hear a little bit more from you. An
11 executive summary, I think, gets us part of the way to making
12 the packet more manageable, but should we take on fewer things
13 at a time? Should we talk more and write less? Should we ask
14 fewer questions? We really value all the input that we get and
15 want it to be accessible. So, love any more ideas.

16 MR. CHAPMAN: And I appreciate the position you all
17 are in, because I heard many stakeholders kind of share the
18 same comments I just gave when I was on that side of the table.
19 And I was like, come on, people. Do you know how much work
20 we're putting in? And we're trying to understand these issues.
21 It's really tough.

22 I think there's one thing I do want to highly
23 encourage is the use of panels to answer a lot of the technical
24 questions that may come out. I know when I was on the Board, I
25 struggled sometimes to get the questions I needed answered

1 through public comment, because you're kind of playing a
2 Russian roulette of sorts that the right person is going to
3 show up that can answer that question. And I think we have an
4 under-reliance on having these technical panels, especially
5 early in the issue of dealing with complex subjects, to help us
6 set what are the kind of guardrails of these bigger
7 conversations that we need to understand.

8 But I also, you know, I think simplifying the process
9 as much as possible, because, you know, those numbers are fun.
10 They're great to point out. They point out some of the
11 absurdity of it all. No one besides folks like the OTA and
12 some other stakeholder groups are going to comment on
13 everything, right? They're going to comment on their one
14 section.

15 So I do think just making simple changes that make it
16 much more accessible for folks to find the part that they can
17 answer would go a really long way.

18 I would also encourage you to consider the topics you
19 take up. You know, I burned out while I was on the Board, and
20 so that's not a great way of serving the community. That's
21 just a personality trait of mine as well. But, you know,
22 really thinking about that work-life balance and ensuring that
23 you're going after those highest priorities. Some advice from
24 me, and I think there's probably other folks in the community
25 that have ideas as well.

1 CHAIR SMITH: Nate Lewis?

2 SECRETARY LEWIS: Yeah, I'd just like to push this
3 conversation a little further and flip it around a little bit
4 and talk about attracting new Board members to the process.
5 Leadership on the Board and the Board as a whole is going to be
6 looking at five new Board members. You heard it like a big
7 turnover, and I want people not to feel scared to come onto the
8 Board and not see the three years it took to write this or read
9 all these questions or whatever those statistics that you just
10 came up with, to scare off people like, oh, well, I don't have
11 the time, I don't have the --

12 MR. CHAPMAN: Run.

13 SECRETARY LEWIS: Yeah, that wasn't helpful, Tom.

14 So, anyway, I'm just sort of trying to -- we're
15 talking about balance here, right? We're talking about not
16 burning out the Board, not burning out our stakeholders,
17 ensuring engagement. But also, I feel like there's a sense of
18 needing to perfect everything every time, 100 percent, and
19 that, in my view, is a barrier for many of those out there
20 looking at, like, can I even handle, do I have the expertise?

21 I don't want -- everyone's got an opinion, and I
22 think it should be shared if you have a part of this community.
23 So I'm sort of curious, like, where do we strike the balance in
24 terms of bringing new voices onto the Board with this -- you
25 know, the executive summary's not necessarily going to -- it'd

1 be great for stakeholders, but how do we attract folks to the
2 Board and fill it -- you know, to make those applications?

3 MR. CHAPMAN: Yeah, I mean, I think some of the
4 follow-ups I gave to Allison's question is some of it, right?
5 Making sure you have that balance, making sure you have the
6 support. There's been phenomenal changes in the last five
7 years with the support of the NOSB specialists that help, I
8 think, take a lot of that burden off and make it more
9 realistic.

10 I think us as a community out on this side of the
11 table need to have realistic expectations of what we ask the 15
12 of you to do, because there's limits to it. But I also think,
13 Nate, you answered some of your own question there about your
14 perfect over progress, right? Progress is what we should be
15 striving for.

16 Organic is always about trade-offs. You're never
17 going to find that perfect solution to anything. So you'll
18 need to take the ball forward, but at a certain point realize
19 when it's time to set that down, take a vote and move on, and
20 realize that there's always going to be another bite of that
21 apple by the Board that follows you or whoever comes next.

22 CHAIR SMITH: Brian?

23 BD. MEM. CALDWELL: Yeah, thanks, Tom. Some more
24 numbers and ideas that might not actually help what Nate Lewis
25 just was asking about, but we have probably literally over 100

1 million consumers or eaters, as we like to call them, of
2 organic foods as well that are a big part of this equation.
3 And we have groups that consolidate input about a bunch of the
4 topics that we're working on and foster discussion and then
5 funnel it to us. And so just, you know, these other big
6 numbers and big groups are also functioning in this universe.
7 So I just wanted your response to that.

8 MR. CHAPMAN: A hundred percent. They have to have
9 the time and capacity to carry out those conversations, but
10 they're all important conversations that have the perspectives
11 that need to be shared, be it the consumer groups,
12 environmental groups, business groups, farmer groups, whoever
13 it is. It's important that we're hearing those voices, and I
14 just ask you to constantly be thinking about process
15 improvements. We can always be getting better, but we always
16 have to embrace that self-continuous improvement as well.

17 CHAIR SMITH: One more. Amy?

18 VICE CHAIR BRUCH: Sorry.

19 CHAIR SMITH: Yeah, go ahead, Amy.

20 VICE CHAIR BRUCH: Okay, thanks, Kyla.

21 Tom, thanks for your time today. I wanted to ask
22 you, what is the catalyst to grow? I was looking at an article
23 that had a quote from you from May 14th, 2024 about --

24 MR. CHAPMAN: This is such a Tom-style question. I
25 guess karma is the term I'm looking for.

1 VICE CHAIR BRUCH: Sorry.

2 MR. CHAPMAN: What did I say?

3 VICE CHAIR BRUCH: Okay, it's about market share.

4 Although organic is now a maturing sector in the marketplace,
5 we still have plenty of room to grow. What's the catalyst?
6 How do we get there?

7 We heard from the Northwest Top Reason today that
8 some markets are saturated. Producers want to grow more
9 organics. Consumers want to eat it. How do we get there? And
10 how do we get there quicker than the number you referenced?

11 MR. CHAPMAN: Yeah, it's going to take all of us, so
12 I don't have all the answers. That's unfortunately the reality
13 of where I sit. But, you know, we need to ensure that the
14 organic seal is valued and valuable, right? If it's valued and
15 valuable, if it's trusted, consumers will pay for it. And
16 that's, I think, a big piece of where we need to go, is getting
17 consumers that are willing to not just pay a lot of money for
18 an iPhone, but willing to invest that same amount of money into
19 their own personal health, into their environmental health,
20 into their farm workers' health, and buying organic food.

21 And that's going to take a lot of education. It's
22 going to take cultural change. It's going to take support from
23 the government in ways that we haven't seen before, programs
24 that appreciate and understand that organic is priced
25 differently. And so the support programs need to be designed

1 to support those areas.

2 It's a lot of work still to be done. But if we do
3 that, I think we can get the flywheel going. We can keep
4 growing it. We have segments of our market that are 1 percent,
5 and you have segments that are 15 percent. You can look at
6 European countries that have much higher organic consumption at
7 a per capita level. They also have different support programs.
8 They also have different agricultural and cultural systems.
9 But there's a lot of tools that we have to keep moving forward.
10 But we need to stay focused on the growth, if that's an area
11 that people agree with is an important objective for us.

12 And so our objective is to grow and protect organic
13 seal until it's the foundation of American agriculture.

14 CHAIR SMITH: Thanks, Tom.

15 MR. CHAPMAN: Thank you.

16 CHAIR SMITH: Oh, shoot. Okay. Are you sure? Okay.
17 You're free.

18 Steve Ela, then Brian Baker, then Patrik Barr.

19 MR. ELA: Well, apparently it's the sliced bread
20 portion of the comments here.

21 My name is Steve Ela. I'm an organic tree fruit
22 grower outside the small town of Hotchkiss, Colorado, former
23 NOSB member, and a staff member of the National Organic
24 Coalition, and today I present comments on behalf of the NOC
25 members.

1 I wish to echo the comments of Alice Runde. We as an
2 organic community need to pay careful attention to racial and
3 social equity. The NOSB should have racial equity as a
4 standing work agenda item, and there should be training for all
5 incoming Board members. For some, the training is redundant,
6 but for others, such as myself, it would have been helpful.

7 In crops, NOC supports the compost definition in this
8 fall proposal. While we share the sentiments of other
9 organizations that compost feedstock should only be of plant
10 and animal origin, we also believe that the potential addition
11 of any synthetic feedstock is a national list issue and is
12 clearly under the jurisdiction of the Board.

13 Materials. NOC has consistently supported option one
14 for inert materials. We believe this is the only option that
15 provides transparency and evaluation according to OFDA
16 criteria. We strongly oppose option two.

17 This is the first time that option two has been
18 discussed, and it has serious flaws in that it only evaluates
19 the human health effects of pesticide residues in food, but
20 does very little to evaluate the health effects on applicators,
21 farmers, farm workers, and environmental harm. Furthermore,
22 option two suffers from the same issues as other mass listings,
23 while theoretically community members could petition to remove
24 a problematic material, there is no way for the public to even
25 know what materials are being used. At a minimum, there has to

1 be transparency of what materials are being allowed.

2 Furthermore, this option puts the onus on the public
3 for removal of synthetic substances from the list rather than
4 the Board reviewing substances to add to the list.

5 Livestock. I know this is going to be like the
6 lightning rod, but NOC opposes the proposal to add Meloxicam to
7 the national list. It should be sent back to subcommittee.
8 While we believe that Meloxicam could be useful in organic
9 production and maybe should be approved at some point, the
10 current proposal falls short. The Board may feel like you have
11 been working on this for a considerable time. However, for the
12 public, there has only been 30 days for comment. All the other
13 discussions have been in private small groups, telephone calls,
14 and subcommittee. I've had several people tell me they believe
15 the Board had already made its decision before this proposal
16 even hit the public sphere, and this is a terrible optic for a
17 Board that should pride itself on transparency and inclusivity.

18 The discussion should be about whether there is
19 widespread community support, and if not, what can be done to
20 make it better.

21 The science that is being cited must be presented to
22 the public, either as a TR, or if the Board did its own TR, as
23 that TR being attached to the proposal. I believe in the
24 expertise of the Board that we need to be able to see that data
25 as well on this side of the fence, not just in internal

1 discussions of the Board. Further, the annotation stating
2 withdrawal periods must be added, and it must include both meat
3 and milk.

4 As the National Organic Coalition, I do need to end
5 with a knock-knock joke, and it is about Halloween. So, Kyla,
6 if you would indulge me. Knock-knock.

7 CHAIR SMITH: Who's there?

8 MR. ELA: Boo.

9 CHAIR SMITH: Boo who?

10 MR. ELA: Kim, do you want to answer this? This is
11 like a dad joke of why are you crying, but I'm going to finish
12 with a different way and say kombu, seaweed, and wakame seaweed
13 and fish oil. The Board must continue to work with the NOP to
14 find ways to protect marine ecosystems and better make sure
15 that marine ecosystems are protected.

16 So, thank you.

17 CHAIR SMITH: Thanks, Steve. Questions for Steve.
18 Nate.

19 SECRETARY LEWIS: It's all kombu on that joke.

20 You all mentioned in your comments not having enough
21 warning or information related to the methionine annotation
22 change, and I want to not necessarily talk about that proposal
23 specifically, but how do we get this annotation process right.
24 What's the right vehicle to communicate to the stakeholder
25 community that we're considering a change? Because I felt like

1 I said it a number of times, an included question, so I want to
2 get it right, so suggestions thrown on the table. We want to
3 make sure folks know that's happening and can comment on it and
4 aren't caught by surprise.

5 MR. ELA: I mean, it's a great question. It's always
6 a tension between nimbleness and quick action and lots of
7 transparency and notification.

8 I think at a minimum, because we follow subcommittee
9 notes, but there's a lag time for subcommittee notes, so I
10 would say at a minimum put it in the subcommittee notes right
11 after the Board meeting. Your next subcommittee calls, if you
12 think you're going to be working on an annotation, get it in
13 those notes because then in three months before everything hits
14 the streets, we at least have a heads up on that. I mean,
15 that's like the last minimum. If it's happening after that, we
16 just don't see it.

17 Ideally, as you said, you talk about it in the Board
18 meeting, but lots of things get talked about in Board meetings,
19 so it's hard to kind of say, well, you're going to work on this
20 or you're not going to work on that. So that's my suggestion.
21 And I think Kyla has really worked to try and -- and you all
22 have worked to try and work on annotations more, and we applaud
23 that. So it's a learning curve for all of us.

24 CHAIR SMITH: Kim?

25 BD. MEM. HUSEMAN: I love a good dad joke, Steve.

1 When you said that, I was going to respond with boo-hoo, I'm
2 crying over spilled milk. But I liked your segue into marine
3 materials and thankfully get to exit the Board before that
4 conversation gets thrown out in the whole context of livestock.

5 My question, as I was formulating for handling and
6 moving things along quickly, and I kind of got tripped up, and
7 it has to do with both collagen gel and with gelatin. And
8 we've talked on this subject a little bit today about
9 commercial availability, and now that's going to be a word I
10 won't use anymore.

11 But NOC's position was they want more information on
12 what supply is sufficient. And I think, as a Board member, I'm
13 asking the stakeholders the exact same question. So where does
14 that information line? Where do we get to conventionalism feel
15 comfortable as a community?

16 MR. ELA: Yeah, it's a tough one. And I think we
17 suffer as NOC because we're a membership group of members. So
18 it's kind of what Tom said. We help try and bring things
19 together, but we also don't have direct touch with the
20 manufacturer or with growers sometimes. And so it's a tough
21 one for us to answer. And I think -- and it's a tough one for
22 you to ask.

23 And I think several other people noted, or Tom noted,
24 expert panels and things. Often the people in the room maybe
25 aren't the experts in that particular topic. And so do we need

1 to be creative in who we reach out to for comment? Do we even
2 know who they are? I think we probably need to spend more time
3 on that.

4 BD. MEM. HUSEMAN: Should we get like 606
5 manufacturer panel, because I -- and to Tom's point -- sorry,
6 Tom, you're not even up here, but we're going to keep referring
7 back to you.

8 So many times, being succinct and also, you know,
9 it's really -- plagiarism is also an okay term to use in some
10 of our sunsets. But I feel like we feel that there's a need to
11 put in a question. And the very first question is, is this
12 commercially available? Can we take this -- what's the barrier
13 to take off less? And being asked the same question back, I'm
14 like, well, yeah, that's what I'm asking. So --

15 MR. ELA: Well, I mean, I think I'm going to read. I
16 mean, so when Jerry first got on the Board, we had colors. And
17 I think this is a great example of it. Colors is a long
18 listing of multiple colors. And that question was very real.
19 Like, well, some may be commercial available. Some aren't.
20 And those have been the comments in the past. And, you know,
21 and kudos to Jerry. You know, I had the sunset. He said, I
22 want to help you. And he had the time to reach out to
23 manufacturers and call them and say, do you, you know, what's
24 the deal here?

25 And on those colors, you know, we recommended

1 delisting -- Jerry, help me out -- five of them. I expected
2 there would be kickback when we got to rulemaking. And it slid
3 right on through. So I think that was, you know, an example of
4 maybe where Jerry having the time to reach out directly to the
5 manufacturer really helped inform.

6 BD. MEM. HUSEMAN: So, Jerry, you get another five
7 years on the Board; is that what I -- I won't take up any more
8 time.

9 CHAIR SMITH: Nate.

10 BD. MEM. POWELL-PALM: Hi, Steve. Zooming out a
11 little bit. How do we -- I heard some concerning feedback on
12 sort of how we establish expertise when we're reviewing
13 materials. And I would describe a lot of the feedback we heard
14 as somewhat anti-science. And I realize kind of COVID forward,
15 there's been sort of like this balancing act of folks saying,
16 are doctors all liars, all veterinarians, all, you know,
17 antibiotics zealots. How do we decide that we are a community
18 that values science and we take science seriously and we don't
19 ask our neighbor what their opinion is to establish a
20 scientific fact?

21 MR. ELA: I mean, I agree with you. I'm a science-
22 based person and I think my comments are actually saying what
23 you want. From this side of the fence, like on Meloxicam, I
24 know you all looked at the science. But the science you looked
25 at is not transparent to us. So you wrote your own TR. We

1 don't know what it says.

2 So if it's going to be science-based, put the
3 science-based in your proposal so that we can all evaluate it
4 as a community and look at it and say, yeah, that looks good.
5 No, it doesn't. And it's one of the reasons -- you know, the
6 TR is part of the issue because, and I realize on my Board, at
7 the end, we would just get a petition and ask for TR, just
8 boom. I know it's not part of the PPM. And I'm going to say
9 it probably should be because it helps avoid this. But you
10 didn't, and it's not in the PPM, so fair.

11 But then show us what you did because that's not
12 transparent to the public. It is to you guys, your experts,
13 but let us know. And then it becomes science-based.

14 BD. MEM. POWELL-PALM: Totally. Backing up to like
15 xylazine and tolazoline materials that you would have had
16 fingerprints on as chair, with -- or as a member, with AMDUCA,
17 I guess, for the community, what is enough for explaining kind
18 of how the world works? So with AMDUCA, we have veterinarian's
19 license on the line saying that if you are caught with a
20 prescription that ends up in milk or meat in any level, we're
21 talking zero, you have no license anymore.

22 And so when we're saying, well, we need x number of
23 days to have that sufficient withdrawal, what is our -- I
24 guess, how much explanation do we need to say for what AMDUCA
25 is and that we are getting down to zero, lower than anyone is

1 expecting, and it is on the license of the veterinarian in
2 order to make sure that that is accomplished?

3 MR. ELA: I mean, I'll say first of all, I don't
4 think that's general knowledge. So I mean, that's something
5 I've learned. So while the public doesn't know it, you're a
6 livestock person. You work with veterinarians. I'm a plant
7 guy. I don't work with veterinarians.

8 So and the general public doesn't. But the other
9 thing is, you know, we often say double the withdrawal period
10 for organics. You know, how many veterinarians, and maybe all
11 of them know that.

12 BD. MEM. POWELL-PALM: All of them know that.

13 MR. ELA: Okay. Then that would not be something I
14 would assume, quite honestly.

15 BD. MEM. POWELL-PALM: Okay.

16 MR. ELA: Because organic regulations are not often
17 known by, you know, everybody. I mean, we all struggle with
18 organic regulations ourselves. So our point was put the
19 withdrawal period in the annotation. It's clear. It could be
20 double AMDUCA. And then it also gives the certifier something
21 to come back and say, your animal was treated here. It was
22 sold here. We're good.

23 BD. MEM. POWELL-PALM: I'm going to stop you on math
24 real quick. Double AMDUCA would be double zero. Can we, is
25 zero times zero still zero?

1 MR. ELA: But what I heard in the public comments was
2 it's not zero. You're talking about half-lives.

3 BD. MEM. POWELL-PALM: Zero, right -- zero threshold
4 if tested.

5 MR. ELA: Depending on what testing method you use.
6 And this is the whole problem is you can test at many different
7 levels. So I think there we get into definitions. And so to
8 me it's like, so we don't have this argument. Be clear. Put
9 it in the annotation. Then it's all done.

10 CHAIR SMITH: Nate.

11 BD. MEM. POWELL-PALM: Thank you, ma'am.

12 CHAIR SMITH: Wrap it up.

13 Thanks, Steve. Appreciate your time.

14 MR. ELA: Thank you. And thank you to all of the
15 retiring Board members. It was a pleasure to serve and be on
16 the Board with you.

17 CHAIR SMITH: Awesome. Okay. Brian Baker, you're up
18 now. Then Patrik Barr. Then Meggan Hain.

19 MR. BAKER: Madam Chair and thank you members of the
20 Board for the opportunity to speak and the good work. I'm
21 Brian Baker, speaking today on behalf of OrgTracker, a project
22 of the Heartland Health Research Alliance. OrgTracker is a
23 multifaceted tool to improve the safety and quality of organic
24 food. Please consider these constructive comments on risk-
25 based certification, pesticide residue testing in the global

1 supply chain, and inert ingredients in pesticide formulations.
2 Please refer to our written comments.

3 Risk-based certification. The NOSB should prioritize
4 health and food safety risk above all others. Scientific
5 evidence, including data from the USDA's Pesticide Data
6 Program, shows that organic food significantly reduces dietary
7 risks from exposure to pesticides. Organic standards can still
8 further reduce those risks.

9 Residue testing. OrgTracker is a tool that can
10 identify crops and regions that are hot spots to be targeted as
11 high risk for pesticide contamination. Getting certifiers to
12 pool resources and partner with the PDP can leverage other
13 residue tests that will result in a more effective and
14 efficient program to detect high risk pesticides in organic
15 food.

16 The PDP and FDA need to share their results, their
17 hot results with certifiers in real time if enforcement is to
18 be a priority. Our comments also take a fresh look at
19 unavoidable residual environmental contamination and what
20 levels are obviously below -- beyond the control of operators.
21 That's an unfinished task for the NOSB.

22 Inert ingredients are, as we prefer to say, co-
23 formulants. Unlabeled ingredients and crop protection products
24 used in organic production are an issue that predates OFPA and
25 subsequent reforms to pesticide regulations. We urge the NOSB

1 to weigh the risk posed by all ingredients used in organic
2 production and handling. Each ingredient in any given
3 pesticide formulation is there for a reason. Undisclosed co-
4 formulants are often more toxic than low risk labeled
5 ingredients allowed for use in organic production. We cannot
6 support either option as written. Each has merits. Both have
7 flaws. Both expand the NOSB workload beyond capacity.

8 The proposed options do not explain how the NOSB
9 chooses to evaluate such formulants. Our comments propose a
10 compromise solution that takes the best of both options. And
11 before making a final recommendation, the NOSB should request a
12 technical review of all co-formulants in current use by organic
13 producers and handlers and develop a procedure to add and
14 subtract from that list before it recommends any specific
15 substances to be added to the national list.

16 The options are two speeding trains on the same track
17 heading towards each other. If the NOSB passes both options as
18 written, a train wreck with a pending federal election will
19 occur. We urge the NOSB to withdraw both proposed options,
20 keep the current rule, and recommend a consensus solution that
21 merges the best of both proposed options. Thank you.

22 CHAIR SMITH: Thanks, Brian. Questions? Amy.

23 VICE CHAIR BRUCH: Brian, thanks for your time today.
24 I really appreciate the written comments you and Chuck
25 submitted.

1 I had a question. Can you provide a little more
2 insight on just the availability of data on conventional crops?
3 You mentioned about setting UREC based on the mean of the
4 positive samples of the same pesticide found in conventional
5 samples. Where does that data set reside?

6 MR. BAKER: That data set resides in AMS, in the
7 Pesticide Data Program. It's under the same umbrella. I don't
8 know where it physically resides, but, you know, you're under
9 the same umbrella. It is a very extensive, very well curated,
10 very rigorous program that has limits of quantification below
11 those used in regulations.

12 So what we're seeing there are very small amounts of
13 very low residues in a lot of samples of organic food. Still
14 less than half are contaminated, but these are obviously the
15 result of drift. They're often residues that are not -- for
16 which there are no tolerances because they were applied to
17 another crop for which that pesticide was labeled and it drifts
18 onto a crop for which it's not labeled. That's not the organic
19 farmer's fault, obviously. Okay?

20 So that's where the data resides and that's why it's
21 important to understand what the conventional levels are, as
22 well as the organic levels, when determining UREC and what
23 might be potential fraud and what really doesn't require
24 further investigation in a risk-based certification system.

25 VICE CHAIR BRUCH: Thank you.

1 CHAIR SMITH: Thanks, Brian. Oh, no. Okay, thanks,
2 Brian.

3 I thought I saw a hand. Okay, we have Patrick Barr,
4 then Meggan Hain, and then Garth Kahl.

5 Name and affiliation and you can get started.

6 MR. BARR: Hi, I'm Patrik Barr. I'm the Vice
7 President and Sales Director of Bright Pharma Caps. We're the
8 ones that have produced the organic certified pullulan
9 capsules.

10 Tess, my wife, that helped write the patent and
11 started the company, did the talk yesterday, and I don't know
12 how many of you heard that, but she decided not to get in too
13 deep into pullulan. If anybody wants to know a lot about it,
14 I've got handouts. But the big thing today is this is what
15 we're talking about.

16 I brought an organic certified capsule for every one
17 of you. You can taste and feel it. It's unlike any other
18 capsule. It's clear. It's flexible. It runs better, and
19 we're really proud of them.

20 Our sales, I've also -- you guys got a lot to be
21 proud of too. I've just researched quickly on some statistics,
22 and the organic food, I saw numbers over \$50 billion. Well,
23 that's what the natural supplement industry is too. And not in
24 the organics, but it's becoming a bigger part. The capsule is
25 the preferred delivery method, and it's only when we brought

1 these out that they could get the little green seal and have it
2 organic certified. And as I say, you get the green seal, your
3 product will fly off the shelf.

4 So it's been a struggle, and as you know, a lot of
5 organic farmers, it's not easy. We have had these on the
6 market over 10 years. We're still the only one. If it was
7 easy, there'd be others. And this is not the first time
8 pullulan's been to the NOFP rodeo. And years ago, when Oregon
9 Tilth represented us, he said, you should have been a fly on my
10 shoulder to hear what was going on then, because nobody knew
11 it.

12 Now I've been in a room where I've heard it
13 repeatedly said correctly, and I want to thank you for that.
14 And it's something to be proud of, and proud of organic and
15 that we've done it. We're doing really good. There's no issue
16 on shortages. We're only selling about 30 percent of what we
17 could make right now, and we could triple that growth. We're
18 happy to pull down lines that we do HPMC capsules on, because
19 we are dedicated to organic.

20 Which brings up another thing that people have heard
21 me talk before as one of my pet peeves, is the equivalency with
22 the EU. They can bring in and get the USD organic seal on a
23 product that has an HPMC capsule. That has been on the
24 prohibited list in the US. But because of that, they can bring
25 a product in and get that seal. That's not fair to us or our

1 customers that are really organic, and it's just something I
2 try to say that people should be aware of. I think it may be
3 -- we're trying to deal with it in the EU, but people need to
4 hear that.

5 CHAIR SMITH: Thank you. Questions from the Board?
6 Oh, Allison.

7 BD. MEM. JOHNSON: Thanks for being here and your
8 comments.

9 MR. BARR: Thank you.

10 BD. MEM. JOHNSON: It's exciting to maybe have
11 something that we could pull off the list that's become
12 commercially available as organic.

13 We heard in earlier comments that it may become
14 complicated because we have a non-agricultural listing that
15 allows use in meat with organic products. To the extent that
16 you know the process for producing non-organic pullulan, can
17 you -- is there a process difference that should cause that
18 distinction, or is there a way we could fix that problem and
19 still pull it off the list?

20 MR. BARR: You know, I don't want to stick my foot
21 out in anybody's business too much, but there really isn't,
22 other than, as you know, the details of what you have to go to
23 maintain that certification. We are being approached by people
24 just because at this point you can get it cheaper or we could
25 sell it cheaper. If we bought truckloads, would it be cheaper?

1 Because HPMC is half the price of organic, and organic is a
2 little bit more than non-organic. But as I've heard about
3 this, the market driving some of it, that could be it. But we
4 could go either way, and I don't think there really has to be a
5 difference.

6 Our material is superior to what's out there that is
7 made by the other people. This is one thing we learned. When
8 the only supplier of conventional pullulan was from Japan, we
9 would have viscosity problems. We would have to buy it and
10 deal with their viscosity. When we kind of were off the market
11 for a few years, that's when we dedicated ourselves to making
12 our own pullulan. So now we've developed it. We don't have
13 those issues. The material is a higher quality product. But I
14 don't see why there needs to be a difference.

15 But this is, again, what I'm hearing some of the
16 stuff that you've said earlier, is that the market will drive
17 it. Why would anybody buy unorganic if they were trying to get
18 the organic seal, or even the made with organic, why would they
19 buy that if they can get the organic? And I think it's going
20 to level itself out in the market.

21 Because of legal costs, we haven't been advertising.
22 It's only been recently that we've been able to join groups,
23 put advertising out, and get it out there. And I get calls
24 almost every day. Got one from Finland this morning. This is
25 exactly what I've been looking for. I can't believe you have

1 it. Well, that happens almost daily. But our growth right now
2 is 40 percent in the last year, and we can sustain that for
3 quite a while. But it's a big thing for the marketplace, and
4 I'm really proud that we can do this.

5 CHAIR SMITH: Thank you. Appreciate your comments.
6 Thanks for joining us.

7 We have Meggan Hain, and then Garth Kahl, and then
8 Angela Wartes.

9 DR. HAIN: All right. So my name is Dr. Meggan Hain.
10 I'm a veterinarian and animal care specialist with Organic
11 Valley. And thank you very much for the opportunity to speak.

12 So I'd like to start by thanking the National Organic
13 Standards Board and the Livestock Subcommittee for their
14 consideration and thorough review of the Meloxicam petition. I
15 am one of the veterinarians who started the Meloxicam petition
16 with the primary goal of providing organic farmers with
17 practical pain control methods to provide the best welfare for
18 their livestock.

19 We recognize the organic focus on limiting synthetic
20 chemicals to only those which are reviewed, responsibly used,
21 and deemed as necessary. We believe that meloxicam meets these
22 requirements.

23 The meloxicam petition was thoroughly reviewed, all
24 the questions asked by the NOP of a petition substance. In
25 addition, the use of meloxicam in U.S. livestock species is

1 already strictly regulated by the Food and Drug Administration
2 through the Animal Medical Drug Use Clarification Act, or
3 MDUCA. This Act strictly regulates the use of extra label
4 drugs, which meloxicam is in livestock species, and sets the
5 responsibility on veterinarians to prescribe and oversee, as
6 the recognized medical providers for livestock and the
7 guardians of food safety.

8 Veterinarians are trained in medicine, including
9 pathology or the understanding of disease, pharmacology or the
10 understanding of medicine's effects, and finally food safety to
11 ensure that food production from animals are safe for public
12 consumption.

13 MDUCA also sets strict limitations, which include
14 only using FDA-approved human or medical drugs, which have
15 undergone safety testing, not allowing any drugs which could
16 pose a risk to human safety, limiting the use of extra label
17 drugs to the treatment of illness or the alleviation of
18 suffering, so they cannot be used for growth promotion.

19 Under MDUCA, the veterinarian holds the
20 responsibility and the risk of prescribing extra label
21 medications for food on our patients.

22 For meloxicam, there is a zero tolerance for meat and
23 milk, meaning that any residue is considered a violation. In
24 addition, if a residue is found, the FDA may take regulatory
25 actions against the veterinarian, including warning letters,

1 fines, injunctions, meaning the loss of a license, or criminal
2 prosecution. So finally, to answer the last question as to
3 whether meloxicam as a synthetic medication is necessary in
4 organic production. While I agree with natural treatments as
5 the first line, I do not agree that we should use these
6 treatments if we know that they are not the most effective and
7 that their use results in unnecessary pain or suffering.

8 Aspirin has also recently been removed from being
9 able to be used in dairy cattle. This removes another option
10 for our organic producers. So this just leaves Finrexin, which
11 is effective, but not as easy to give.

12 So, thank you guys. Any questions?

13 CHAIR SMITH: Thanks, Dr. Meggan. I see one from
14 Kim.

15 BD. MEM. HUSEMAN: Hi, Dr. Meggan. I really
16 appreciate your testimony today. Can you speak to -- per the
17 conversation on what happens when a veterinarian's license is
18 at stake? You talked about that is one form of kind of that
19 procedural process when the practice is not adhered to. What
20 happens?

21 DR. HAIN: Certainly. So in the case of a violative
22 residue, whether it's meloxicam or whether it's any other drug,
23 say sort of an antibiotic that's not supposed to be used or any
24 drug that's labeled, the FDA will first go to the farm. They
25 do a thorough investigation of what happened. Where was that

1 medication from? Was there a prescription on that medication?
2 Was that prescribed by a veterinarian?

3 Looking at that prescription, if the prescription is
4 correct, you know, and everything is correct there and that,
5 they'll follow up with the veterinarian and say, you know, was
6 the set correctly? Are you working with that producer to make
7 sure that they are taking every step, you know, in order to
8 prevent that animal or products from that animal entering the
9 food supply?

10 If every T has been dotted and I has been crossed,
11 you know, it'll often end there, and they'll just make everyone
12 go back and go through a thorough review of the process in
13 order for that not to happen again. But if they go through and
14 determine that the veterinarian did not take the necessary
15 steps to ensure that that drug was safely used, then that
16 veterinarian could be taken to their state board and lose their
17 license.

18 CHAIR SMITH: Nate Lewis.

19 SECRETARY LEWIS: Can you just very tangibly paint a
20 picture for us? You're at a farm. You're prescribing
21 meloxicam for some sort of surgery, pain relief, whatever. Do
22 you hand them over a bottle of pills and hope for the best? Or
23 do you write a prescription that says withdrawal period is X
24 number? Like, what's --

25 DR. HAIN: What's the process?

1 SECRETARY LEWIS: What's the process? Yeah, thank
2 you.

3 DR. HAIN: Absolutely. So, any time we're looking at
4 using meloxicam or any extra-label drug, the first thing we
5 need to do is establish what the diagnosis is or what the
6 medical need is. So meloxicam being a pain medication, it's
7 not usually, hey, we're using this to treat an illness, we're
8 using this to control pain.

9 So, the first thing we do is establish a diagnosis,
10 and then we have to actually look at that species and that need
11 and say, is there already an FDA-labeled drug that's allowed to
12 be used in this particular species? If that's the case, we
13 have to use that drug. So, that's sort of the rule there.

14 If we determine that there is not a drug that's
15 already sort of FDA-labeled for that use in that species, then
16 we can go and prescribe meloxicam. We have to make sure that
17 that drug has the drug we're using, and in this case, meloxicam
18 has a human FDA label, that it is human sort of FDA-labeled in
19 that.

20 Next thing we'll do is go through and determine what
21 should that extended withdrawal be, you know, in order to make
22 sure that we don't get any sort of violative residues there and
23 that. So in a case where I'm not sure what that withdrawal
24 time will be, what I do is I reach out to the Food Animal
25 Residue Avoidance Database, which is a group of veterinary

1 pharmacologists and that, who will go through and determine the
2 appropriate withdrawal for a very specific case. So they don't
3 do general withdrawals. They are very specific. So we'll call
4 them and say, hey, I've got a cow that I want to put on
5 meloxicam for lameness. You know, she's a dry cow. What do I
6 need to do for, you know, this sort of lameness in order to set
7 appropriate withdrawal?

8 First thing they'll ask is, what's her dose? What's
9 her duration? Any other confounding factors. They dig into
10 all the research and then they'll determine, right, there's
11 enough research in order to establish a withdrawal in this
12 specific case. They extend that withdrawal because they don't
13 want to have any residues there either. So they provide us
14 with an extended withdrawal.

15 If, when they look at that research, say it's a
16 species that there isn't very much data on, they'll come back
17 to us and say we can't establish a withdrawal. You either
18 can't use that medication in that animal, or if you do, that
19 animal can't go into the food supply. So we make sure that we
20 can absolutely establish a good withdrawal.

21 Next thing we'll do is, because there's, you know,
22 this is an extra label prescription medication, I will leave
23 them that drug bottle with that prescription on there that says
24 very specifically this is the use. So the animal it's allowed
25 to be used in, the dose it's allowed to be given in, the

1 duration of time, and then the withdrawal. So it covers each
2 of those things in that, and then generally, if it's a farm I
3 don't know well, I'll also make sure that they have a well-
4 established way of segregating that animal for that withdrawal
5 period, and a good process for managing that.

6 SECRETARY LEWIS: Thank you.

7 CHAIR SMITH: Brian?

8 BD. MEM. CALDWELL: Yeah, thanks Meggan.

9 Couple of questions. First, how often are samples of
10 meat or milk tested for Meloxicam?

11 DR. HAIN: So Meloxicam is one of the medications
12 that's tested for under random testing, so not every sample is
13 tested. So it's not as if every sample going through is going
14 to be tested, but with the penalties that are involved there,
15 you know, if you stand the chance of getting caught, there's
16 enough of a sort of incentive not to take your chance.

17 BD. MEM. CALDWELL: And do you know, for a non-
18 detect, what kind of level is it, like parts per million, parts
19 per billion? Because I'm sure that you could detect it if you,
20 you know, tested it for, you know, \$5,000 or something like
21 that. But that's --

22 DR. HAIN: Yeah, certainly in that. So for Meloxicam
23 and that, where there's not an FDA sort of food label, you
24 know, food animal label in there, there's no established
25 tolerance. So, you know, what they do is with certain

1 medications, they'll establish a tolerance. So this amount of,
2 say, penicillin, you know, is allowed to be within a product,
3 and that's the withdrawal they run to.

4 So for any drug like Meloxicam that's not got any
5 sort of label for food animal, whether it's for pain, or
6 whether it's for inflammation, whether it's for something else,
7 there's no established tolerance. So they will test down as
8 far as they can test. So essentially, testing down as far as
9 the sensitivity of that sort of lab will test. If there's any
10 residue at all, then that's considered violative.

11 BD. MEM. CALDWELL: Yeah. And back in the day, it
12 would have been like parts per million. Now it could be, you
13 know, parts per billion. But, I mean, we don't know what the
14 specific test would be.

15 DR. HAIN: I was going to say, that would be a
16 question for, yeah, a veterinary pharmacologist.

17 BD. MEM. CALDWELL: Yeah. Finally, so there have
18 been some concerns about human reactions and health effects to
19 Meloxicam. What kind of -- are those health effects from when
20 a person actually takes Meloxicam as a dose themselves, or are
21 they talking about something that residue that you would get
22 from a meat or milk product? Do you see what I'm saying it?
23 Is it like --

24 DR. HAIN: Absolutely, yeah. Yeah. No, those side
25 effects. So Meloxicam is a human drug. You know, so there

1 have been human safety tests done. So the questions about side
2 effects and that in human beings come from the human safety
3 testing.

4 So you know, at that stage, we're looking at a full
5 dose, you know, for that sort of, for a human being. You know,
6 which, in any case, if you're going to see any, you know, the
7 goal is have no food residue in that. But the likelihood of
8 seeing any side effects in that, you know, is negligible,
9 essentially, because that will be a trace of nothing, if
10 anything.

11 BD. MEM. CALDWELL: Yeah. So, the side effects are
12 tested at doses that would be, you know, thousands or multiples
13 of thousands times more concentrated than what they would get
14 as a residue on a food product.

15 DR. HAIN: Yes. So there are -- if there are food
16 products -- so there, sorry. If there are medications where
17 there are concerns about sort of residues in that that could
18 cause a human safety risk, those medications are not allowed
19 within food animal use. So we've got a list of medications
20 which are absolutely no-go for food animal veterinarians. You
21 cannot prescribe those as extra label.

22 Phenylbutazone is one, chloramphenicol is another.
23 So there are absolutely medications that we would have a
24 concern, you know, at a minor traceability, but those are
25 already completely off the list.

1 BD. MEM. CALDWELL: Right. Meggan, thank you so much
2 for these in-depth comments, and I also just want to thank
3 everybody else. We've gotten some fantastic comments written,
4 the verbal comments and the Zoom comments, just wonderful input
5 from this community. I really appreciate it deeply. So, thank
6 you, Meggan.

7 DR. HAIN: Thank you all very much.

8 CHAIR SMITH: Thank you. We're in the homestretch,
9 folks. We've got four more comments.

10 Garth has brought an outfit and props. Up after
11 Garth is Angela. Sorry, you have to follow this act. And then
12 Cathleen McCluskey, and then Chellsey Lenczyk.

13 Go ahead, Garth.

14 MR. KAHL: Garth Kahl, Organic Integrity Cooperative
15 Guild, Common Treasury Farm Grower, Stockman Inspector,
16 consultant, reviewer, been in the industry a long time.
17 Thanks, you all, for your service, and the NOP as well.

18 In the spirit of Halloween, I brought a few props
19 along to just prompt me to highlight a certain number of
20 topics. You already have my written comments. I'm wearing my
21 bump hat, my high-vis vest, my transportation worker identity
22 card. I have my sampling kit here with tamper-evident tape.
23 Thank you very much, CCOF, reminding me to say, testing in the
24 global supply chain. We need to be testing in the global
25 supply chain with new criteria. We need to be looking for

1 glyphosate. We need to be looking for organic solvents. And
2 we need to be testing high up in the supply chain. We need to
3 be going into ports. We need to be going into transloading
4 facilities. We need to be going into rail facilities.

5 Certifiers, you can do this. You can ask your
6 importers to do this. You can charge them more. You can get
7 notice when they're bringing in bulk shipments. It's doable.
8 Please see my comments.

9 Let's talk about meloxicam briefly. This is a
10 castration tool. It's a castration bander. If you're a
11 ruminant animal, you're going to get this. It's rather painful
12 if you're a male animal and you need to be castrated. You're
13 going to get this. If you're a piglet, you're going to endure
14 this scalpel. Okay? Ouch, I see people squirming here. This
15 is why we need more options in our toolbox.

16 I had to follow Dr. Meggan. But, you know, meloxicam
17 is needed. Our vets are saying that it's needed. And as
18 inspectors, we already have tools in our process on every
19 organic dairy to look for milk diversion. So it's there. It
20 plugs in really well into our system. And I would urge the
21 Board to move it forward.

22 Let's talk about induced mutagenesis with this head
23 of broccoli and this apple. So as our seed breeders have told
24 us in many of the comments, induced mutagenesis is out there.
25 It's been part of classical seed breeding since the 1930s.

1 This broccoli, probably it or its parentage, was developed
2 using self-fusion, induced polyploidy. This apple may have
3 been a product of zapping the parentage with high levels of x-
4 rays to induce mutagenesis. It's part of classical seed
5 breeding. We need it. We don't want to go down that rabbit
6 hole.

7 Last but not least, I brought an egg here. Okay.
8 An egg. DL-methionine. It's time to put this chicken to
9 roost. Okay?

10 We've been talking about this since the early aughts,
11 since before the last time the NOSB meeting was here in
12 Portland and I attended, and we were talking about D-L-
13 methionine.

14 As the position paper so well puts it, it didn't
15 work. We tried soldier larvae. We tried other pulses. It
16 didn't work. It's time to clean DL-methionine. Thank you very
17 much. I welcome any questions.

18 CHAIR SMITH: Thanks, Garth. I see one from Nate
19 Lewis.

20 SECRETARY LEWIS: Thanks, Garth. Great way to kind
21 of liven up the evening session here.

22 MR. KAHL: It's the end of the day. I had to do
23 something.

24 SECRETARY LEWIS: So Meggan described to us what
25 happens when she's on an organic farm and prescribes meloxicam

1 with the withholding time and all those sorts of things. Now
2 let's do a little more role playing. You're the inspector on
3 that farm. Can you walk us through what your job is in
4 ensuring that the withdrawal period that was prescribed by the
5 vet was adhered to by the producer so that the regulation was
6 met by the producer?

7 MR. KAHL: Absolutely. So every organic farm, as
8 part of their organic system plan, has to track and describe
9 how they're tracking medical inputs. That might be a salve.
10 That might be a homeopathic remedy, and specifically any input
11 that requires a milk withdrawal time. We already have it with
12 flunixin. We have it with lidocaine, all of our current tools.

13 So they already have to describe how they're doing
14 milk diversion. Now to evaluate that as an inspector, you're
15 going to go through and you're going to look at their records.
16 Okay, cow 332 had flunixin. How did you ensure milk
17 withdrawal? Was she put in the hospital pen and that was then
18 milked with a bucket milker so that milk was dumped? Was she
19 run through the parlor as last? So oftentimes operators will
20 run through the parlor. Their hospital pen will run through
21 the parlor last so that milk gets dumped.

22 So operators are already doing this. They already --
23 it's one of the key components to any organic dairy inspection
24 is how are they documenting milk withdrawal? If it's a robot
25 -- if you happen to be on one of those farms that has a robot,

1 there's actually a computer program generated that says, yeah,
2 at 0300 hours, cow 333 walked into the robot and her milk was
3 dumped down the drain. So farms already -- dairies already
4 have to do this. It's baked into their OSP and it's baked into
5 just any general organic dairy inspection checklist.

6 SECRETARY LEWIS: Thanks very much.

7 MR. KAHL: Sure.

8 CHAIR SMITH: Kim.

9 BD. MEM. HUSEMAN: I'm just going to point out, I've
10 said to this Board several times in several meetings, we need a
11 show and tell. And you nailed it, quite frankly. And I'll
12 take those castration tools and keep them right here.

13 Well, I do think that the practicality in bringing
14 forth to this community and being able to see farmers who might
15 be in a -- they're not in attendance, but this is so directly
16 impactful, to be able to have a visual, to understand it a
17 little bit more closely is very vital. I know this is more
18 than a statement than a question.

19 I guess my question around that is, what I heard you
20 say is, we're not reinventing the wheel with Meloxicam. We're
21 putting another tool in the same vein of what's already
22 happening. So from your perspective, does the dairy, the sheep
23 herder, the organic pork producer have anything new to do other
24 than manage one additional tool?

25 MR. KAHL: Well, they'll have to work with their vet

1 because it is required with a prescription. But no, they
2 should not have to put any additional systems in place.
3 They're already required by the regulation to track any input
4 that has a milk or meat withdrawal. And they already -- that
5 record keeping already should be getting reviewed at every
6 single inspection. It's a key component of any livestock
7 inspection.

8 And, you know, the show and tell is all part of, you
9 know, Teacher Amy's class. So we're just following Amy's lead.

10 CHAIR SMITH: You're brown nosing the teacher.
11 You're looking for extra credit, I guess, here, huh? Thanks,
12 Garth. Appreciate it.

13 MR. KAHL: All right. Thank you.

14 CHAIR SMITH: Oh, sorry. Amy has a question.

15 VICE CHAIR BRUCH: Yeah. Just a brief one, Garth.
16 Thank you. Thanks for the demonstration. That's very helpful.

17 You mentioned in your written comments, I appreciate
18 all of them, about the need for a collaborative approach from
19 certifiers. We need guidance documents to talk about the
20 collaborative approach so we can understand testing in these
21 long, complex supply chains. Can you touch on some of those
22 core components that are going to be necessary for that
23 guidance document?

24 MR. KAHL: Sure. Well, absolutely. And the guidance
25 document touched on a lot of them. We need new guidance from

1 the NOP. I mean, our testing protocol is old, and it's looking
2 for a pesticide screen. It's not even looking at herbicides.
3 We need to know -- we need guidance, and we need training, and
4 we need to develop training collaboratively, maybe through ACA,
5 maybe through IOAA, maybe a collaboration of both. But we need
6 to know what kind of test works best where. So sometimes
7 you're taking a representative sample. Sometimes you may be
8 taking a very specific focused sample. And we need to know
9 what we should be looking for in the supply chain, depending on
10 commodity.

11 So if we're looking at grain coming in, say, in a
12 bulk vessel, that's not an extruded soybean meal, we should be
13 looking for glyphosate, for example. If we're looking at
14 extruded soybean meal, we need to say, hey, we should be
15 looking for organic solvent residues. So we need to know what
16 to test for and how to test it. But then also, certifiers,
17 this collaborative environment is new for them. So we need to
18 be working on that continuously. Again, ACA has a big role to
19 play.

20 Every year we need to be bringing back the best, you
21 know, what happens, studies, discuss what worked, what didn't
22 work, in terms of these big supply chain investigations. These
23 supply chains are big, they move fast, and certifiers need to
24 collaborate if they're going to keep up with them.

25 VICE CHAIR BRUCH: Thank you.

1 CHAIR SMITH: Thanks, Garth.

2 MR. KAHL: Thanks.

3 CHAIR SMITH: Angela, then Cathleen. Oh, and you
4 have props, too. Holy bananas. Look at you guys. And then,
5 Chellsey, to round out our day.

6 MS. WARTES: Hi. My name is Angela Wartes-Kahl. I
7 represent the certified operations of Common Treasury Farm and
8 Fibrevolution, Inc., and also as a member and consultant for
9 Organic Integrity Cooperative Guild.

10 Okay. Thank you for the opportunity to speak today.
11 I appreciate all of your work and dedication on the Board. I
12 did this for Nate. It was like the goodbye, goodbye, Nate one.

13 I brought props, obviously. There's a seed shortage
14 occurring in fiber crops. You might not be aware of this. I
15 wanted to highlight an example for you from our network, the PA
16 Flax Project. This is for you, PA Flax. Is the recipient of
17 the OMDG grant with an impressive goal of transitioning 12,000
18 acres of organic fiber flax in Pennsylvania. The annual seed
19 requirement for a project of this size is 300,000 pounds of
20 seed per year. Where is the seed coming from? It's not coming
21 from the states yet. It will be imported from Europe until we
22 can meet the demand with domestic seed production or that is
23 what we thought until climate change hit Western European seed
24 suppliers for the last three years running with heat domes and
25 dry springs. So they actually aren't selling to the United

1 States right now.

2 We aren't the only project -- they aren't the only
3 project in North America working to revive fiber flax for linen
4 production. We at Fibrevolution are planning to build a
5 sketching mill to process 3,000 acres of flax a year here in
6 Oregon. Quebec has a mill plan in the works, then Wisconsin,
7 then Vermont, and so on.

8 You can see that the growing need for organic seed
9 with this new historic -- new/historic crop. To kick off the
10 resurgence of domestic linen, we at Fibrevolution have focused
11 on seed production since 2018 with independent seed breeder
12 Jennifer Kling. It will take us several years to scale up and
13 meet the future demand. I brought some of her collection of
14 fiber flax varieties under evaluation on this side over here.
15 And then this is redded flax, ready for sketching to release
16 the fiber bundles. And here's linen fibers grown in the
17 Willamette Valley. So right down the road.

18 Her operation budget for the last seven years of flax
19 and oat, she's also an oat breeder, totals \$180,000. There are
20 not enough available research dollars to offset some of that
21 expense for independent seed breeders.

22 So let's switch to the natural fiber powerhouse,
23 cotton. Very little organic seed. Limited amount of non-GMO,
24 untreated seed available to fill the void. Breeding organic
25 cotton seed with enough isolation from GMO crops is the biggest

1 obstacle by far to building a supply. And without a stronger
2 guidance from NOP, all cotton seed companies and growers will
3 favor non-GMO, untreated option over organic seed sources at
4 every opportunity. We all know that seed for organic fiber
5 crops is likely grown with synthetic fertilizers, pesticides,
6 and herbicides. Time to tip the scales and focus on organic
7 seed breeding for forage crops, cover crops, and all grains.

8 The demand is there. If they make a T-shirt on it,
9 there's demand. Radicchio, there's demand.

10 CHAIR SMITH: Thanks, Angela. Questions from the
11 Board?

12 Nate Lewis. Nate Powell-Palm, sorry.

13 BD. MEM. POWELL-PALM: I knew that was bound to
14 happen.

15 Sorry, was that \$187,000 a year or total over seven
16 years?

17 MS. WARTES: Over seven years, she spent 180,000.

18 BD. MEM. POWELL-PALM: And so if I hear you right,
19 your proposal is that we really need to have a large public
20 investment in public breeding.

21 MS. WARTES: Absolutely.

22 BD. MEM. POWELL-PALM: To marry up to this regulation
23 idea.

24 MS. WARTES: Yep.

25 BD. MEM. POWELL-PALM: Okay. Thank you.

1 MS. WARTES: The bigger the better.

2 CHAIR SMITH: Thanks, Angela. Appreciate it.

3 Last two speakers, Cathleen, and then Chellsey,
4 you're on deck.

5 DR. MCCLUSKEY: Rounding it out with the seed. All
6 right. I'm here for it.

7 Good evening. My name is Dr. Cathleen McCluskey, and
8 I'm the advocacy director for Organic Seed Alliance. We're a
9 mission-driven organization that works to ensure organic
10 farmers have the seed they need to be successful, and we
11 achieve this goal through research, education, and advocacy.
12 My comments will focus on the certification, accreditation,
13 compliance subcommittees, consistency, and organic seed use
14 discussion document. We applaud the NOP and the NOSB for
15 picking back up this issue.

16 OSA was founded in 2003 to fill a gap in formal
17 instruction about organic seed improvement and production at a
18 critical juncture when NOP rules around organic seed became
19 active. Relatively little certified organic seed was available
20 at the time, and while we have seen incredible progress since
21 then, the sector has experienced stagnation today. Seed
22 systems are complex with interrelated functions of variety
23 development, supply, dissemination, production, and use, and
24 pertinent to this meeting, legal frameworks.

25 We are at an incredibly important choice point about

1 whether we will evolve the organic sector to be built on and
2 contribute to a thriving and resilient organic seed system, one
3 in which the organic sector cultivates its power and innovation
4 for germplasm management, breeding, and seed production that
5 aligns with the principles that built the organic movement.
6 This will take coalition building across the entire organic
7 sector, and we know the immediate tasks in front of us: growing
8 the quality and quantity of the organic seed supply, recruiting
9 and training more high-quality organic seed producers and plant
10 breeders, knowledge flow about various production scales and
11 systems, critical assessment of how seed choice affects each
12 touchpoint. I'm going to throw a public breeding investment
13 back in here, too. Thank you, Angela.

14 We strongly urge the NOP to prioritize the
15 implementation of NOSB's 2018 recommendation to update the
16 organic seed planting and stock regulation as a next step.

17 Now, I'm not going to use the big, scary, de-database
18 word. However, a system for collecting and analyzing real-time
19 organic seed availability is absolutely the first step in
20 creating a framework for closing seed exemptions that avoids
21 undue hardships on organic growers. And NOP and NOSB's
22 continued feedback and future support in identifying this
23 resource is just absolutely necessary. It will never be our
24 intention to push growers to use a variety that is not
25 appropriate for their operation. However, more consistent

1 enforcement of the requirement, including consistent tracking
2 and improvements, is necessary if we're going to see increases
3 in the availability of sourcing organic seed.

4 OSA has been committed to navigating an equitable
5 path to 100 percent organic seed usage for over 20 years, and
6 we will continue to do so in partnership with NOP, NOSB, and
7 the entire organic community.

8 Thank you for the opportunity to provide comments
9 today and for your service on that Board.

10 CHAIR SMITH: Thank you. I see a couple questions.
11 Allison first.

12 BD. MEM. JOHNSON: Thanks for your comments, Cat.
13 One thing that has stood out to me so far in comments is the
14 role of buyers in driving continued reliance on non-organic
15 varieties. What solutions do you think we have available to
16 pushing the market side and the demand side upstream?

17 MS. MCCLUSKEY: Yeah, I mean, I think this was a
18 question that was brought up and discussed yesterday on the
19 organic seed panel discussion hosted by NOC. And, you know,
20 the point that was made, which I think is a really strong one,
21 is that if a company was requiring or asking a grower to apply
22 an excluded method or some sort of pesticide that's on the list
23 to the crop, they wouldn't do it, right? And so there's sort
24 of this same kind of push of question of seed supply or seed
25 variety supply when we have increased vertical integration in

1 the production system.

2 And I think that if we are able to move forward with
3 closing this loophole, that vertical integration question is
4 going to become more and more pertinent for us to sort of
5 figure out as an organic community. Yeah, we'll get there.

6 BD. MEM. JOHNSON: Can I ask a follow-up?

7 MS. MCCLUSKEY: Is it about patents?

8 BD. MEM. JOHNSON: No, I want to push back on that
9 answer, actually. I think this is pretty distinct in that it's
10 not a prohibited practice to source a non-organic seed. So if
11 it's a question of being passed over by a buyer or having an
12 opportunity to sell an organic product, the choice is pretty
13 tough on the grower. So if you can follow up or continue to
14 think about what levers we have to push on that handling piece,
15 it does seem like a really crucial part of the puzzle.

16 MS. MCCLUSKEY: It absolutely is, Allison. And, you
17 know, I think it plays out in different scales. I think that
18 happens more at a larger scale. And in interviews that we've
19 conducted around the state of organic seed report, growers are
20 really uncomfortable talking about it and at some points just
21 unable to due to contract agreements. And that is an issue of
22 transparency that we are going to have to tackle as a
23 community. I don't have answers for you today.

24 CHAIR SMITH: Brian?

25 BD. MEM. CALDWELL: Yeah, thanks for your comments.

1 I want to ask some sort of more future-oriented
2 questions about gene editing, and I hope it's not too much of
3 an out-of-sequence set of questions. But I won't use the D-
4 word database, but I'm going to use the old-school word list.

5 MS. MCCLUSKEY: We've been going with resource,
6 Brian. But, yes, go ahead.

7 BD. MEM. CALDWELL: So are we going to need a list of
8 excluded varieties that we can determine were produced via gene
9 editing and some of these new technologies? In other words,
10 it's not going to be obvious from the, you know, the label of
11 the seed packet or whatever. It's not going to be, you know,
12 it's not required to be disclosed.

13 But how are we going to move forward with, you know,
14 knowing what to plant? Because we're pretty much, you know,
15 mandated to not allow gene-edited varieties.

16 MS. MCCLUSKEY: Correct, which is challenging since
17 we have no testing available for that, right?

18 I mean, again, some conversation that -- there has
19 been a lot of conversation amongst the organic seed community,
20 especially since April. And so, you know, something, again,
21 that was discussed yesterday on the panel was that it's going
22 to take a concerted effort from industry folks, from seed
23 companies, who are agreeing to a code of ethics about not
24 putting gene-edited varieties into the supply of organic seed.
25 That's the beginning of the conversations that I've been

1 hearing and that we've been engaged in. But at this point, I
2 mean, I don't have answers for you today on gene-editing
3 either.

4 BD. MEM. CALDWELL: So it would be a sort of a
5 declaration from the seed company that whatever is sold by that
6 company as organic would not be gene-edited?

7 MS. MCCLUSKEY: Correct.

8 BD. MEM. CALDWELL: Okay. All right.

9 MS. MCCLUSKEY: That's going to take a lot of
10 relationship building and coalition building. Absolutely.

11 BD. MEM. CALDWELL: And so, you know, along with the
12 issues with sales of organic seed and contracts, would that
13 benefit the organic seed industry when that comes into play?

14 MS. MCCLUSKEY: Can you repeat?

15 BD. MEM. CALDWELL: Well, in other words, there's
16 this issue of, you know, people using untreated conventional
17 seed. But if only organic seed could be guaranteed to not be
18 gene-edited, would that be a very strong incentive for growers
19 to plant that seed?

20 MS. MCCLUSKEY: I would imagine so.

21 BD. MEM. CALDWELL: Thank you.

22 CHAIR SMITH: One more, Cat. Amy.

23 VICE CHAIR BRUCH: Cathleen, thanks for your time
24 today. Quick question. Do you have any insight on organic
25 seed development outside of the U.S.? Because our program is a

1 global program, and it's one thing to look at just what's
2 happening on our shores. We import a lot of goods. Is there
3 any insight that the Organic Seed Alliance has internationally?

4 MS. MCCLUSKEY: Largely, our mission focuses
5 domestically. And so we don't -- so our state of organic seed
6 report does not gather data internationally at this point.
7 However, given the date setting by the EU and the conversations
8 that I've been having with policy partners and seed companies
9 in the EU, we are considering expanding our data set.

10 So at this point, I don't have hard data, so I don't
11 want to speak without that. But, yeah, I'll leave that there.

12 VICE CHAIR BRUCH: Okay, thank you.

13 CHAIR SMITH: Thanks, Amy. Thanks. Quick.

14 BD. MEM. DIMITRI: Thank you so much, Cat. I really
15 appreciate this information.

16 One problem I have when I think about seeds is, like,
17 it's such a huge category. So if you were going to, like, make
18 a way forward and pick, like, one or two areas, like one or two
19 crops or one or two segments of the market, what would you
20 pick?

21 MS. MCCLUSKEY: Oh, I am not the person. I don't
22 think that anybody in the organic community, in the organic
23 seed community, don't come at me if you're in here, but I don't
24 think that anybody could pick that right now.

25 I don't -- I think that we are at conversation point

1 about -- I mean, those conversations are sort of the next piece
2 of happening, and that's where this real-time availability
3 resource is why it keeps coming up as this real important tool
4 that we need to figure out how to establish as a community.

5 CHAIR SMITH: Thanks, Caroline. Hold on, Cat.

6 BD. MEM. POWELL-PALM: So quick. I don't mean to
7 come at you, but it seems like we heard a lot about vegetable
8 seed.

9 MS. MCCLUSKEY: Yeah.

10 BD. MEM. POWELL-PALM: Corn, beans, and wheat seem
11 like we would be much more comfortable than 89 vegetables that
12 we heard from our grower today.

13 MS. MCCLUSKEY: Yeah.

14 BD. MEM. POWELL-PALM: Why are we not talking about
15 grain here?

16 MS. MCCLUSKEY: Yeah, I wasn't not talking about
17 grain.

18 BD. MEM. POWELL-PALM: Okay. Okay. It just seems
19 like we need to focus.

20 MS. MCCLUSKEY: Yeah, yeah, absolutely.

21 BD. MEM. POWELL-PALM: It seems like those
22 commodities would be much easier for our first low-hanging
23 fruit steps.

24 MS. MCCLUSKEY: In conversations I've been having,
25 yes, that is where the conversations are going. That's where

1 we would be looking, Nate. Yeah.

2 CHAIR SMITH: Thanks, Cat.

3 MS. MCCLUSKEY: Okay, thanks, Kyla.

4 CHAIR SMITH: Okay. Last but certainly not least,
5 Chellsey?

6 MS. LENCZYK: Thank you. This was a long time to
7 wait to make my first ever comments, but I'm super excited, and
8 I echo everyone's sentiments for the gratitude to the Board and
9 to the CACS committee for elevating the organic seed
10 discussion.

11 CHAIR SMITH: Chellsey, real quick. I'm sorry. Name
12 and affiliation before you get too much further.

13 MS. LENCZYK: Okay. I am the organic lead for Bejo
14 Seeds and also the co-chair for the OTA Organic Seed Task
15 Force.

16 Bejo is a family-owned vegetable breeding and seed
17 production company that will see 2025 mark our 20 years as USDA
18 certified organic. Bejo has worked tirelessly on the global
19 platform to help support European legislation for organic seed
20 usage. Arriving at the current EU goal of 100 percent organic
21 seed usage by 2036 has taken decades and many iterations.
22 Policies there rely on high participation levels from organic
23 seed breeders and suppliers and high adoption rates by organic
24 farmers and handlers.

25 Through a checks and balances system, allowances for

1 conventional seed usage is closely monitored and diminishing.

2 In a nutshell, things are working.

3 I acknowledge that the U.S. organic program is a
4 creation of our own, and I do not suggest that the EU model is
5 a plug-and-play template nor even that a goal of 100 percent
6 organic seed usage is feasible here in the U.S., in part due to
7 the complexity of the U.S. supply chain and market, but also
8 due to the sheer size of the U.S. territory and numerous
9 farming scales and practices, as I elaborated in written
10 comments.

11 What we do support to bring forward from the EU model
12 is the broad-scale thinking and systemizing which has mobilized
13 breeders, producers, farmers, handlers, and consumers.

14 In the U.S., we need to bring forward a pragmatic,
15 multifaceted strategy which builds on the current U.S. organic
16 program, perhaps reconsiders commercial availability, and
17 mirrors the confidence of saying, yes, we can continue to
18 improve on organic.

19 While I do not stand here today with a multifaceted
20 strategy in hand, I instead make a request for time. Since
21 June, Bejo and numerous other organic industry stakeholders
22 have begun to meet and envision what U.S. strategy could look
23 like for increasing organic seed usage, and we have a couple
24 ideas. A stepped, sound, and sensible approach that focuses on
25 reasonable and achievable crops and deadlines. A survey on

1 data on organic crop acreage by market segment, forming crop
2 expert groups to weigh existing genetic attributes and seed
3 availability, to narrow which crops to begin with and move on
4 to down the line, and creating a real-time seed availability
5 resource to unburden growers and inspectors alike.

6 Within the next 12 to 18 months, we hope to propose a
7 strategy representing a majority of the organic seed chain
8 point of view, and ultimately creating meaningful improvement
9 in organic seed usage. To quote Dr. Tucker, collective work is
10 needed to innovate the system.

11 To the Board and program, please allow us a window to
12 strategize. To stakeholders, please bring us your ideas. And
13 to everyone listening today, let's build the strategy together
14 and answer collectively that we are committed to continuously
15 improving organic. Thank you.

16 CHAIR SMITH: Thank you. Questions? I see one from
17 Allison.

18 BD. MEM. JOHNSON: Thanks for bringing us home here,
19 Chellsey. Last stretch. I appreciate all the work that is
20 happening on seed and also hear a request for time. What do
21 you think the Board can do in the next year or so to help
22 facilitate forward movement? Or should we take a step back and
23 allow conversations to happen and kind of hear from you when
24 it's time to move again?

25 MS. LENCZYK: Yeah, so I'm a little bit new on the

1 kind of legislative part of it, so what's appropriate, I'm not
2 exactly sure of. I hope no one pauses on moving forward
3 conversations. And so whether that's a next discussion
4 document that hones in further on some of these ideas, whether
5 we can bounce ideas off of you as far as what it takes to
6 develop an expert group, what resources might be available or
7 what levers we might need to pull to find resources to make
8 some sort of availability resource, I think having the ability
9 to ping-pong those ideas and start to get granular with
10 feedback from the program and the Board and informing as we
11 move on through this discussion period. Because I would hate
12 to work in silo for the next 12 months, assuming we know or are
13 making the right decisions without having that vetting and
14 back-and-forth process available. I think we'll get there
15 faster together.

16 CHAIR SMITH: Okay. I think we did it, folks. Thank
17 you.

18 Yes, thanks so much for all the commenters. It's
19 such a rewarding conversation. We only went over by an hour,
20 so, you know, but super valuable. And we made it before the
21 reception, so that's all that really matters.

22 A reminder, there is a reception being hosted by the
23 Oregon Organic Coalition. There's information on the flyers
24 that are taped to the door.

25 Thanks again for all the attendees in the room today

1 as well as all the attendees on Zoom. The links will be the
2 same tomorrow.

3 And so we are now in recess until 8:30 Pacific Time,
4 Wednesday, October 23rd, tomorrow. Be here or be square. See
5 you.

6 (Whereupon, at 5:57 p.m., the meeting was concluded.)

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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2024 MEETING
PLACE: Portland, Oregon
DATE: October 22, 2024

was held according to the record, and that this is the
original, complete, true and accurate transcript which has been
compared to the recording accomplished at the hearing.



Elaine M. LaRosee,
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2024 MEETING

Wednesday,

October 23, 2024, 8:30 a.m., PST

Hilton Portland Downtown

Atrium Ballroom

921 SW Sixth Avenue

Portland, Oregon 97204

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Amy Bruch, NOSB Vice Chair

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Erin Healy, Division Director of Standards (Webex)

Jared Clark, Assistant Standards Director

Andrea Holm, Agricultural Marketing Specialist, Standards

Devon Pattillo, Agricultural Marketing Specialist,
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Johanna Mirenda, Agricultural Marketing Specialist,
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Heather Kumar, NOSB Technical Support Staff
Standards Division

Dr. Jennifer Tucker, Deputy Administrator, NOP

Michelle Arsenault, Advisory Committee Specialist,

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1 PROCEEDINGS

2 (Time: 8:32 a.m.)

3 CHAIR SMITH: Okay. Welcome back. We're reconvening
4 and starting Board deliberations today. You can see the agenda
5 on the slide.

6 I also just wanted to say another thank you to the
7 Oregon Organic Coalition for the reception last night. We got
8 to celebrate some awardees including the NOP Standards Division
9 Team, woohoo, and got to hear some additional remarks from the
10 Under Secretary that started off on a banana phone, of all
11 things.

12 So, okay. So you can see here we're going to start
13 the day with the Livestock Subcommittee presentation. We did
14 have a little bit of an order shift, so we're going to do the
15 meloxicam proposal first, then we're going to go to the 2026
16 sunset reviews, and then we're going to do the annotation
17 changes after that. Made more sense to talk about the sunset
18 reviews of methionine and iodine before we talked about the
19 annotation change, so we're going to make that slight
20 adjustment.

21 Then we'll move into PDS Subcommittee just for a
22 verbal update, then we have Crops, which will round out our
23 morning, and then we'll take a lunch break. Then we have a
24 guest speaker from NRCS, and we'll end the day with the CACS
25 Subcommittee.

1 A couple another announcements. At the end of the
2 day, Board members, we are taking a group photo, so after we
3 conclude don't run off, please, so we can get a photo, and
4 we'll follow Penny somewhere I'm sure. Also, all Board alumni
5 that are in the audience, you have also been requested to have
6 a photo at the end of the day, so again, don't scamper off. We
7 would like you to join us in a photo. Yeah, there's a lot of
8 alumni Board members in the audience with us today. That's
9 great.

10 Okay. I think with that, I am going to turn it over
11 to Brian to lead us through Livestock.

12 BOARD MEMBER CALDWELL: Great. Thanks, Kyla. We
13 have some important discussions from the Livestock Subcommittee
14 today. Oh, I do the clicker? All right. I'll try to do the
15 clicker.

16 Yeah, and I want to thank -- there, that would be
17 better -- I want to thank my fellow Livestock Subcommittee
18 members for their really excellent work this semester and this
19 year. And I also want to thank the wider organic community for
20 the really thoughtful comments that we get through all venues,
21 and we really, really pay attention to them, we use them, we
22 take them to heart, and we try to respond to them and
23 incorporate them whenever we can. So I just always want to say
24 that that feedback is really super critical. It's really kind
25 of the main focus of our work. So thank you.

1 And I want to especially thank Nate Powell-Palm and
2 Kim Huesman who are our senior members on the Livestock
3 Committee and are rotating off, and it's really dismaying.
4 This has been such a -- it's been wonderful to have their
5 leadership and their expertise. And they both were very
6 interested in reviewing the meloxicam petition, and so of
7 course they were the ones who were assigned that. So with no
8 further ado, let's get into meloxicam. Thanks.

9 BOARD MEMBER POWELL-PALM: All right. Thank you,
10 Brian.

11 Kim and I sort of convinced Brian that it would be
12 okay to be chair of Livestock this year. It's easy, there's no
13 agenda, it's nothing, I mean why don't you just go for it,
14 it'll be fun. And it's been a true honor working with you, and
15 thank you for your leadership on this subcommittee.

16 We received a petition to add meloxicam to 205.603
17 for use in organic livestock production to alleviate animal
18 pain. We have a slight, non-substantive change that we've
19 cleared with the Program, and that is if we go down to the
20 motion to add meloxicam, we're actually just going to be
21 striking the word meat. And we'll get into it.

22 Kim, please go ahead.

23 BOARD MEMBER HUSEMAN: All right. This is not
24 scripted, so we're going to bounce back and forth a little bit
25 on the particular petition. So it did come to us in February.

1 The petition from meloxicam was a desired material to be on the
2 National List for pain management. It came to us from four
3 different entities that, as producers, saw a need in the
4 community for pain management.

5 BOARD MEMBER POWELL-PALM: There were some questions,
6 and a big takeaway from, I think, the experience we've had
7 listening to public comments on this particular material was
8 making sure we remind folks of the process. So when a material
9 comes to a subcommittee, the members decide whether or not we
10 need an external TR - it's right there in the PPM -- and we had
11 a commenter yesterday remind us of it. And there's a lot that
12 it says, that the goal is, hopefully, that we've had
13 Secretaries of Ag who have appointed really smart folks -- not
14 tootin' our own horn -- but really smart folks who are able to
15 do this work internally, and if we can't do it, then we go
16 outside of the NOSB and use an MRO.

17 But let's get down a little bit more to why does this
18 even matter? So I've been on Livestock for my entire time on
19 the Board. The esteemed Chair Illa (ph) appointed me saying,
20 Nate, you know what a cow is, get in there. And I think that
21 that's somewhat -- we've been somewhat light on livestock
22 expertise in this board over the years, and so it's been a real
23 privilege to land at the same time as Kim who is also a fellow
24 Wyomingite and has a lot of great stories about getting roughed
25 up on a ranch.

1 But, Kim, would you share a little bit about these
2 two photos?

3 BOARD MEMBER HUSEMAN: I just realized these are
4 making the transcript. Yeah, so I grew up on a cow-calf
5 operation. We had 300 head of cow-calf pairs. I also had --
6 the very first time I actually owned a pig was because I caught
7 it at the county fair. They had a program where they oiled
8 down a baby pig, and if you caught it, you got to keep it.

9 Well, I didn't realize that was the prize. So here I
10 am, tootling with my first stock at our county fair, and my
11 mom's like what is that? I'm like, I just won this. Later on,
12 that animal ended up in our freezer, but it was the beginning
13 of my appreciation for multiple species of livestock.

14 So my cousin and I are quite basically mixing feed --
15 I have all my 4-H records to show you exactly how much soybean
16 meal, corn, and other additives are put into that diet. But my
17 show pigs and our beloved bucket calf Didi -- because when a
18 mother cow doesn't make it through the birthing process we got
19 to have pets for a short period of time -- so we taught them
20 how to let us ride them.

21 BOARD MEMBER POWELL-PALM: When I was I think like 16
22 in this photo, would remind me that maybe this was yesterday.
23 But Margaret Scholes (ph.) was my inspector, and I was like,
24 look how good of a cattleman I am. And this was this crazy
25 range cow that I had tamed down, and she's like 15 or 16 years

1 old in this photo. And I've been from the get-go a cattle guy.
2 I've really thought about what I wanted to do in life was to be
3 a stockman, and in many ways I've gotten that privilege.

4 But I think my first consideration for what does it
5 mean to steward animals came from reading every single one of
6 James Harriot's Creatures Great and Small, and thinking about
7 that there is the chance to strike this bargain with those
8 animals that we steward where we are going to provide a life as
9 free of pain as possible. And when I think about Honey here,
10 the first cow I ever owned, I think about that it would have
11 been really great to have a lot of tools in the toolbox, no
12 matter what state of production we're in, to make sure that she
13 felt that I was doing as right by her as she did by me.

14 Something that I didn't expect from public comments
15 was a reminder that in America there are a lot of 10-year-old
16 farmers. We call them kids of farmers, but those are farmers
17 who are doing the work, making sure that calves are taken care
18 of, as we heard from one commenter saying that they're the ones
19 who are applying the flunixin right now with a big old needle,
20 possibly stabbing each other. And I think about if we're going
21 to be a community that values small family farms that this
22 human aspect of the ability to administer this medication
23 safely is something that I'm really grateful that we got the
24 chance to consider and that was brought to our attention.

25 This is a photo of me and my littlest brother, who's

1 now a PhD student, raising a calf.

2 BOARD MEMBER HUSEMAN: And it goes on. I'm the
3 towheaded blonde in the back, with my older sister Lisa riding
4 her horse Dandy, with the grain silo in the background as well.
5 And we were responsible for being the ranch hands that would
6 collect calves and cows in the fall and bring them off of our
7 grazing pastures, and in southeast Wyoming that was about
8 somewhere between 3,500 and 4,000 acres because you needed a
9 lot of land for cattle in that region. And we were the same
10 ranch hands that busted open twine bales at 10 below in the
11 middle of winter so my dad could push those bales out with our
12 loader.

13 To Nate's point -- and I think we heard through
14 public comment, and it did resonate with me -- there's a lot of
15 times I should not have been in the position that I was in at
16 the age that I was, but nobody else was going to do it, and my
17 dad had no -- there was no discrimination in our family. We
18 were two girls, and we were ranch hands, and that's all there
19 was. And I learned so much through the process of having that
20 opportunity about cattle stewards and horses and animals and
21 family and can tell you that there were times where it would
22 have been a lot easier if we could have just used a bolus and
23 given a pill.

24 BOARD MEMBER POWELL-PALM: I look at this picture,
25 and I think that it's rare that you have an opportunity to do

1 good on this board. I think we go through a lot of technical
2 procedures. But the idea of a, what, six-year-old Kim here
3 getting the chance to be safe on a farm is something that I
4 want to be able to deliver as much as we possibly can, and I
5 think through this process we're getting closer.

6 We were really interested in who petitioned this
7 material. It was not manufacturers but rather a really
8 fantastically collaborative, strong cross-section of the entire
9 dairy industry where we have representation for probably
10 75 percent of farms, but more impressively, most of the
11 smallest farms, when we're looking at folks like Crop
12 Cooperative, Horizon, Stonyfield. As we think about those
13 folks that we're trying to serve, that's who is asking for
14 this, and that's something that I thought was really worthy of
15 note when we compare a manufacturer bringing something like
16 meloxicam versus thousands of family farms.

17 BOARD MEMBER HUSEMAN: I know some of this print is
18 relatively small, but it will be. This was part of our
19 discussion through subcommittee. So what Nate and I did
20 through this process, this is our internal TR, and this
21 references every external TR question. Some of them are
22 exposed throughout the writing, but we have put not only the
23 page number to the petition, but then on the scientific data
24 from the research as an appendix and have referenced each one
25 of those points through the questions of an internal technical

1 review.

2 This was not presented post- our subcommittee. We
3 recognize that that's part of the process that we've learned
4 that being more transparent with how we drew the conclusions,
5 the data that we utilized, should have been better represented
6 and will be attached to a proposal.

7 BOARD MEMBER POWELL-PALM: We can always do more.

8 BOARD MEMBER HUSEMAN: Yeah, exactly, and then let
9 this be known that this is possible, doing this work,
10 referencing this information. I think part of the reason why
11 we both took this on, this was very time-consuming, and then
12 the appreciation for the folks that do put this together
13 outside of the panel, and we have jobs, too, right?

14 BOARD MEMBER POWELL-PALM: Yeah.

15 BOARD MEMBER HUSEMAN: So we put a lot of effort into
16 this research, and this is showing the research that was
17 accompanying it.

18 BOARD MEMBER POWELL-PALM: The evaluation questions
19 you see -- and that will sort of scroll through here -- but the
20 evaluation questions you see are in our proposal, and so
21 there's no daylight between what we have here and what was read
22 in our proposal.

23 This will be attached with the recommendation, but I
24 think it's always a great reminder that the more transparent we
25 can be, the better. It just makes the process stronger. So

1 we're really excited to have future boards look to this as a
2 possible path when they get more materials to review.

3 So a question that we heard on public comments was
4 why not limit it to just cows, and why not limit it to just
5 cows of a certain age? And we wanted to dive in a little bit
6 because, while we are cattle people, Kim and I also have dreams
7 for all of the mammals that we steward.

8 And so what's this photo on the right here, Kim?

9 BOARD MEMBER HUSEMAN: Well, you probably don't
10 remember the little pig that was in the first photo, but this
11 is what happens when you overfeed your pig. So this is
12 Cruella. Cruella was my 311-pound market hog that we exercised
13 by letting her out of the pen, and she chased us around. She
14 was one of 12 market hogs that I ended up showing via 4-H and
15 FFA, and this was actually the sale ring. And from my
16 understanding Cruella could very possibly have been, at one
17 point in time ,packaged. This is a private label package of
18 organic sweet pork that you might want on your charcuterie.
19 I'm sure we can come up with something on the charcuterie.

20 We want more of this in the marketplace, in my mind,
21 and I saw two packages -- one was not private-labeled so I
22 didn't bring it, both taste really good with some Organic
23 Valley Havarti cheese --but my point to that is we didn't want
24 to limit that because I prefer to see more of this available.

25 BOARD MEMBER POWELL-PALM: A lot of the commenters

1 who we've heard from in the past have elevated that we wish
2 there was a stronger organic pig market, that there was an
3 organic pig market at all. This material is going to be really
4 influential in trying to make sure that we have good tools for
5 a lot of different species.

6 Now, I'm going to give everyone a trigger warning in
7 case there is anything about animal suffering that is something
8 you would like to not see, but we're about to show a few
9 procedures that are really what we're talking about here.

10 So when we hear dehorning, we're looking at a calf
11 getting the horn buds burned out of its head. When we're
12 talking about pigs -- as Garth so aptly alluded to -- we're
13 going to have a surgical procedure, there's no way to band a
14 baby pig, it's going to be a scalpel.

15 I will just put out there that these are elective
16 procedures that humans want to do to animals. These are not
17 the animals needing this done, this pig would be fine with full
18 scrotum intact. And so when we're thinking about our
19 obligation for how and what do we owe the animals that we
20 steward, thinking about pain management at this stage I think
21 is just crucial. Again, as we expand species, why it's not
22 just cows, we're going to have tail docking in sheep,
23 incredibly common and allowed. How do we manage pain as best
24 we can there? And lastly, I'm going to think about Honey.

25 BOARD MEMBER HUSEMAN: So pain, as it says, does not

1 stop at one year of age. There's different causes for pain and
2 beyond the electives -- and we talked about doing a calf
3 banding of the testicles when they're young -- there are
4 opportunities where 1 in 5,000 chances you don't get both
5 testicles, and later on in life it's noticed, and there has to
6 be a procedure done for that testicle to be removed.

7 Meat product, male species do better if they're not
8 producing a large amount of testosterone. So later procedures
9 can be done in that regard. You have a cow here who clearly
10 needs some medication. Organic dairy lifespan is five years
11 approximately?

12 BOARD MEMBER POWELL-PALM: Yeah, five lactations.

13 BOARD MEMBER HUSEMAN: Five lactations. And compared
14 to the conventional counterpart, one-and-a-half lactations. We
15 want this animal to be able to be milked for a long period of
16 time. That's part of our organic industry. We want old cows.
17 We want to see that life cycle, that ability for the farmer to
18 be able to produce from that animal a longer period of time,
19 and by taking care of that animal we're ensuring that to be
20 possible.

21 BOARD MEMBER POWELL-PALM: As I can appreciate after
22 turning 30, pain only increases with time.

23 We had a surprising and really helpful coincidence
24 that the toolbox is fragile. The tools we have to help animals
25 manage pain is fragile, and it's not always certain that we're

1 going to have the right tools, and as we heard from a lot of
2 commenters, aspirin is now out for lactating cows. And so as
3 we think about the immediacy, the timing of having the right
4 tools available to producers, I think this only just adds more
5 fire to that case.

6 One thing we came up with yesterday that we were
7 really interested in learning about the trade was this note
8 about how beef is top of the list for imports by value. And
9 when we're thinking about opportunities in organic -- when we
10 take how many great organic cows you can raise in Oregon, how
11 many opportunities we have for beef production in America -- we
12 want that to be organic, and this tool will make raising
13 certified organic beef easier in America, so hopefully offer
14 more opportunities for those folks that we were meeting on
15 TOPP.

16 BOARD MEMBER HUSEMAN: And I think driving home the
17 fact that organic farming is a family practice, and this is --
18 from a safety perspective -- another tone of how do we keep
19 American organic farmers safe and how do we ensure that their
20 family wants to continue these practices as they age.

21 BOARD MEMBER POWELL-PALM: Yes, as we see there, a
22 bunch of little farmers that we can keep safe. And these are
23 the folks who are asking for this material, not the
24 manufacturer. It's farmers like these trying to produce the
25 food that we want.

1 A little bit on AMDUCA. This term came up quite a
2 few times yesterday. AMDUCA has been part of the NOP and the
3 NOSB process since 2002. Atropine, butorphanol, xylazine,
4 tolazoline. If you've been on this board, you've dealt with
5 AMDUCA. So I wanted to just promise everyone, it's not just a
6 name thing, who knows about AMDUCA? Everybody knows about
7 AMDUCA if you voted on any of these materials. And so what is
8 AMDUCA? It's just a reminder.

9 The Animal Medical Drug Use Clarification Act of 1994
10 -- so we've had it for quite a while -- permits veterinarians
11 to prescribe extra-label uses of certain approved new animal
12 drugs and approved human drugs -- which would be meloxicam in
13 this instance -- for animals under certain conditions. Extra-
14 label use refers to the use of an approved drug in a manner
15 that is not in accordance with the approved label directions.
16 And under AMDUCA and its implementing regulations published in
17 Title 21, any extra-label use of an approved new animal or
18 human drug must be by or on the lawful order of a veterinarian
19 within the context of veterinarian-client-patient relationship.

20 I just wanted to take a quick second here and talk
21 about how grateful I am that we had an incredible showing by
22 the veterinarian community to come and inform this process. I
23 wanted to reference Jerry's point that he's made many, many
24 times about plastic, that we are a tiny portion of the
25 industry, and it's going to be very hard to say get

1 manufacturers to pay attention to us and our process.

2 I think it is so telling and so lucky how many
3 veterinarians said, despite us being a tiny portion of the
4 organic meats and dairy industry we are worth their time. And
5 we had some heavy hitters. I was so impressed by the
6 professors, by the experts who took their time to engage in our
7 process and provide such a clear endorsement of this proposal.

8 Anything to add to that on vets, Kim?

9 BOARD MEMBER HUSEMAN: I remember -- you saw that
10 picture of me, the little towheaded girl admiring -- we preg-
11 checked all of our cows because that was a condition to live on
12 our farming and ranching operation. That was our business, as
13 if we didn't have a calf, cyclically -- as much as I liked cows
14 and I named them -- if she wasn't bred, she did not stay on our
15 farm. And we had a vet come out every spring and would preg-
16 check the cows. I'm not going to go through that process, but
17 it is wrecking on the body after 300 head.

18 These are people that drive hundreds of miles on a
19 daily basis. Their home lifestyle is non-existent. They are
20 there to support the betterment of an animal. And I'm going to
21 just say how much I appreciate the veterinary community to put
22 their personal aspects aside to be there to support the
23 livelihood of an animal.

24 So I trust our veterinarian community. I trust their
25 written word, I trust their oath, and I have seen it firsthand

1 what they're willing to do in order to live for the animal, and
2 that says a lot. So that's the only thing that I would add to
3 that.

4 BOARD MEMBER POWELL-PALM: I really -- I would echo
5 that wholeheartedly.

6 So now's the time. We've got a really incredible
7 opportunity. I am so grateful to serve on Livestock
8 Subcommittee. I am so grateful for Brian's collaboration and
9 Kim's leadership and the chance to serve with you all and do
10 some good in this world, and that we are excited to constantly
11 improve our process, constantly externalize better so we hear
12 you, community.

13 But right now, there's three points we want to make.
14 This is as good as the Board's ever going to get. You all are
15 awesome. We have done such thorough, excellent deliberation.
16 We've had fantastic engagement by the community, and so there's
17 not really a waiting for a different board.

18 Right now our relationship with the NOP, I would
19 argue, is as good as it's ever going to get. This is a program
20 that wants to get things done. This is a program that has been
21 an absolutely essential and performing partner with our
22 recommendations, taking our recommendations into consideration
23 at their truest level. And we've got the cover letter process
24 to make sure that we get all of those finer details
25 communicated over as we hand this from FACA over to APA, and

1 we're ready.

2 And with that, any questions?

3 BOARD MEMBER CALDWELL: Okay. Thank you for a deeply
4 personal presentation.

5 So are there questions from the Board for Nate and
6 Kim?

7 Allison?

8 BOARD MEMBER JOHNSON: I don't know that I have
9 questions at this point, but I do have some comments. Really
10 appreciate the depth of your expertise and the time you spent
11 on this. We are lucky to have such a wealth and depth of
12 information on the Board. And I do feel pretty fully convinced
13 at this point that this material is really important for pain
14 management and that pain management is really important for
15 animals. I think that's pretty unequivocal from the comments
16 that we've gotten. So I do believe that this material should
17 be added to the National List in some form at some point.

18 I feel uncomfortable because of the process, and I
19 think we got such a robust set of comments and very little
20 opposition that, in this case, I don't think we need to go back
21 to subcommittee or I don't think we would gain much if we did
22 that. But I do think it's a lesson to this Board that -- and
23 this is something in my educational life I've learned over and
24 over -- that you have to show your work. Even if you know
25 you're at the right outcome, you have to show your work.

1 So I think this was an imperfect process, and I'm
2 still a little uncomfortable with it because of that, but I
3 really appreciate the time you've put into this material and
4 the really robust comments that we've gotten from the
5 community. So thank you all.

6 SECRETARY LEWIS: I think, well, I have three more
7 years on the Board so I hope to prove Nate wrong that we will
8 have a more collaborative Board and a better relationship with
9 the Program moving forward.

10 So I think what I want to say is that -- it's similar
11 to the thread that Allison's talking about -- and I was sort of
12 not the lead but on the Livestock Subcommittee, so I did see
13 the work that you all did on reviewing the substance against
14 criteria and the exhaustive that review was. But I also just
15 want to acknowledge the stakeholder community and their
16 interest in transparency and visibility about what we're doing
17 on the Board.

18 So I just wanted to acknowledge that and let folks in
19 the gallery know that at least I have heard that and strive to
20 ensure that that will be front and center, that transparency
21 piece, about the work that we do moving forward, and just
22 wanted to put that on the record. So thanks.

23 BOARD MEMBER CALDWELL: Thanks, Nate.

24 Kyla?

25 CHAIR SMITH: Yeah, thanks. Loved the presentation

1 and all the pictures. I actually don't sit on the Livestock
2 Subcommittee, but I -- as the Chair -- I have tried to attend
3 most subcommittee meetings just to sort of keep tabs on what's
4 going on. And so I was present during the Livestock
5 Subcommittee's deliberation of this material throughout the
6 semester, and I also have heard the concerns expressed by the
7 community that there was a lack of a TR done.

8 However, you know, this Board does have the technical
9 expertise to serve in an advisory role to the Secretary on this
10 material, and I saw that loud and clear in my attendance at the
11 subcommittee meetings. So I just wanted to commend Nate and
12 Kim on their review but also the whole Livestock Subcommittee
13 in the review of this material. Thanks.

14 BOARD MEMBER CALDWELL: Mindee, and then Carolyn.

15 BOARD MEMBER JEFFERY: Thank you. I think there's a
16 lot of really great work done here, and I really appreciate
17 everything you guys have done.

18 So questions. I have several questions and a
19 comment. Is referencing AMDUCA a non-substantive change from
20 saying FDA?

21 BOARD MEMBER POWELL-PALM: Yes. So the FDA is --
22 there's routes that we take when we reference FDA. So FDA
23 would manage this through that relationship with the
24 veterinarian. You don't have an official FDA employee from
25 D.C. coming to your door. It's going to be through the

1 veterinarian license process.

2 BOARD MEMBER JEFFERY: Thank you. And so to recap
3 the storytelling, it sounds like this is an essential material,
4 and you don't have human health or environmental concerns.

5 BOARD MEMBER POWELL-PALM: Correct.

6 BOARD MEMBER JEFFERY: Thank you. And then is there
7 any possibility of the work you did to pull the information
8 from the TR out of the petition which could be housed on the
9 petition substance database?

10 BOARD MEMBER POWELL-PALM: We plan to submit this TR
11 that we created, with our recommendation, so that will live
12 with the petition.

13 BOARD MEMBER JEFFERY: So it's referenceable?

14 BOARD MEMBER POWELL-PALM: Yes. It will be, yes.

15 BOARD MEMBER JEFFERY: Okay.

16 CHAIR SMITH: Yeah, I'll just clarify that the
17 recommendation is on the Petition Substances database. So on
18 the Petitioned Substances database it wouldn't say like TR, but
19 it would be attached to the recommendation is my understanding.

20 BOARD MEMBER JEFFERY: Okay. Thank you. So I am
21 also uncomfortable with parts of the process, and I feel like
22 I'm really compelled by the welfare need and the commitment of
23 the veterinarians who showed up for the process, and for what
24 it means to get this much work focused in a particular area,
25 and how little time this Board has in a lot of ways to get work

1 done.

2 And so as maybe the process queen of the current
3 Board, I feel like I can put my process concerns aside because
4 I do support that we do have the expertise and that we did go
5 through the process of working the TR system. And I think in
6 this particular case the onboarding process next year is going
7 to be a big hill to climb, and because we have this expertise
8 here now, and because I'm compelled by the information given to
9 us from the veterinarians and the way the petition is working
10 and because of the answers you've given me now, I feel like I
11 can move through my hesitations because I don't think we're
12 going to land somewhere substantially different in the language
13 six months from now. And so for me, I'm uncomfortable but
14 going to support moving forward due to everything I just said
15 and how I worked my way through it. So thank you.

16 BOARD MEMBER CALDWELL: Thank you, Mindee.

17 Carolyn.

18 BOARD MEMBER DIMITRI: Okay. I mean I really would
19 have appreciated seeing all of this information and having this
20 discussion at this meeting now and then voting on it in the
21 next meeting. And I know that you two won't be here for the
22 next meeting, but this Board is meant to live as an entity that
23 goes on and is not dependent upon any individual person.

24 And so I feel that just because you two think it's
25 amazing -- and I'm not saying it isn't -- and all of the

1 Livestock Committee was behind it, there are other people on
2 the Board, and I think we also deserve the right, just the way
3 people in the community deserve the right to be able to see
4 everything long in advance and have time to talk about it
5 before we actually have to vote.

6 So I'm extremely uncomfortable with the process, and
7 I'll just leave it at that. I would like it to go back to
8 subcommittee, but I already see that the writing is on the wall
9 that I'm probably the only person in that position.

10 BOARD MEMBER CALDWELL: Thank you, Carolyn.
11 Wood?

12 BOARD MEMBER TURNER: I strongly support the
13 material. I really respect the expertise of these two fine
14 humans that I've been on the Board with.

15 I'm trying to parse something you said about the role
16 that -- because ostensibly we are all experts on this board, we
17 all bring some expertise in a range of areas. And I think you
18 guys suggested in your presentation that there's an opportunity
19 under the process that you've run that internal TRs could be a
20 way forward, and I just want to express concern about that
21 because what I don't want to see on this board moving forward
22 is 14 -- not 15 -- 14 experts, all who all who believe they can
23 run processes for whatever material it happens to be.

24 And again, I understand that there's deliberations at
25 the subcommittee level to be able to decide whether or not you,

1 know, how the process is going to be run. But I just -- I'm
2 concerned about that precedent. But I'm also I'm also saying
3 that because I'm also not 100 percent comfortable with the TR
4 process. I actually think we spent a lot of time over the last
5 couple of years elevating some TRs that had 30 years -- where
6 we had 30-year-old TAPs, 30-year-old technical documents. And
7 from my estimation, there have been a lot of perfunctory TRs.

8 There's a lot of things that probably wouldn't need
9 TRs that we elevated to TRs. There's a lot of things that
10 probably didn't have clear support on the Board in any
11 meaningful way that we elevated TRs to add some objectivity to
12 the process. So I just want to be -- I just want to say I
13 don't think internal TR precedent is something that I'm excited
14 about.

15 BOARD MEMBER CALDWELL: Amy?

16 VICE CHAIR BRUCH: Thank you, Brian.

17 Kim, Nate, thank you for your presentation and all
18 the extensive work you did on this material. I do support this
19 material. I was impressed by the level of review that you both
20 took on with this material. And also I was really appreciative
21 of the stakeholder community and the new voices we heard,
22 especially from farmers in the dairy industry and in the
23 livestock industry and also veterinarians. It was impressive
24 to have new voices a part of our stakeholder comment
25 contributions.

1 One of the things that I took away from stakeholder
2 comments and feedback, I am a grain farmer, I don't have any
3 experience with livestock, so it was a real good learning
4 experience just with the community is the method of
5 administration with this material.

6 I thought that really stood out to me, these animals
7 and you. The pictures were helpful. The stories were helpful.
8 They're big. And so it was just really eye-opening to think if
9 I needed to administer a pain medicine to an 800-pound beef
10 animal, that a pill -- the pill form is a lot easier than a
11 needle trying to administer pain medicine. So animal welfare
12 concerns and the administration of this material really stood
13 out to me.

14 Tools in the toolbox for a farmer, sounds like
15 they're very limited in this area and that this is a welcome
16 addition. And then time's ticking for producers. When we
17 delay with the information that we have on hand, I appreciate
18 the concerns that were brought forward with Board members, but
19 from a farmer point of view this sounds like a very -- a pull
20 system versus a push system. They need this, they need it now,
21 and so we need to make sure to take that into consideration.
22 So thank you.

23 BOARD MEMBER CALDWELL: Thanks, Amy.

24 Allison?

25 BOARD MEMBER JOHNSON: Thanks for pulling this back

1 up. Could you actually go to the revised motion? I do have
2 one question or something I'd like to hear very directly. So
3 how precisely does this annotation ensure that no consumer will
4 be exposed to meloxicam via an organic product?

5 BOARD MEMBER POWELL-PALM: Through the AMDUCA
6 process, the residue allowance is 0, and so we have the entire
7 weight of the FDA process ensuring that we will have 0 parts
8 per million, parts per billion -- as Brian was alluding to --
9 that we could have tests very, very down low, and there's a 0
10 tolerance. So that is much bigger than us. I would also argue
11 that we have an agency far in excess of our own authority here
12 backing us up on this.

13 BOARD MEMBER JOHNSON: And do we think with this
14 annotation that a certifier would have the tools they needed to
15 issue a noncompliance if somehow a residue slipped through that
16 system? What would be the repercussion for an operation?

17 BOARD MEMBER HUSEMAN: So the way that this is
18 written is identical to other pain managements that are on the
19 National List. So it would work just as it does for Flunixin
20 or that it does for another medication that is used or on the
21 lawful written order by a licensed veterinarian. And the same
22 process in the OSP and the certifier -- how each certifier
23 manages their inspections. And it just follows that same
24 process with all the other things on the National List.

25 BOARD MEMBER POWELL-PALM: If I could throw one more

1 thing on there. I just, again, I was so tickled by public
2 comments -- the in-person public comments, and especially by
3 Garth Kahl's comment -- talking about that relationship where
4 we have a qualified inspector. When we talk about human
5 capital, when we talk about the inspector role in
6 certification, every single inspection report you're going to
7 be asked about health care treatments, you are going to have to
8 sign off as an inspector that you verified whether or not the
9 withholding period was adhered to, and if there is any problem
10 there, then that results in a noncompliance.

11 And just for a little more specificity, you're going
12 to look at that producer's calendar, you're going to look at
13 that prescription, and you're going to look at that sales check
14 as an inspector, and you're going to say do these three things
15 line up? And if not, you gather that evidence, that goes to
16 Kyla, Kyla says here's your noncompliance. And it's a great
17 process.

18 And I think that's something that we also want to --
19 I would love to see more developed is folks like inspectors
20 being given a little more credit for how much of a role they
21 play in this process as well. We have the vet prescribing --
22 I'd say that's the most essential role -- but then we have
23 another set of eyes saying did you do this? It's not a promise
24 system.

25 BOARD MEMBER JOHNSON: Thank you. And I think if

1 this proposal does get through, it would be really essential in
2 the cover sheet to state that the intent of this annotation is
3 to ensure that no consumers are exposed to residue.

4 BOARD MEMBER POWELL-PALM: Absolutely. I appreciate
5 that.

6 BOARD MEMBER JOHNSON: That was the primary concern
7 that I heard. It manifested in different ideas for how to
8 restrict use and things like that but the underlying concern
9 that I heard is human exposure to this material through food.

10 So, so long as this annotation or whatever the NOP
11 goes on to propose gets at that, I think we're on pretty strong
12 footing. And I didn't catch you talking specifically about
13 striking meat here, but my understanding is that's intended to
14 make sure that dairy is covered too.

15 BOARD MEMBER POWELL-PALM: Yes.

16 BOARD MEMBER CALDWELL: Thank you, Allison.
17 Nate?

18 SECRETARY LEWIS: I'll be brief, and just to maybe
19 put a finer point on it that the current system for
20 conventional animals is designed to ensure that consumers never
21 have meloxicam in their meat or dairy products, and we're
22 adding an extra layer of assurance there through our doubling
23 of that withdrawal time and with an on-site inspector who's
24 verifying those steps as part of the organic compliance
25 toolkit. So we're not only doubling the withdrawal time, but

1 we also inspect and confirm adherence to the rules.

2 BOARD MEMBER CALDWELL: Thank you, Nate. And thank
3 you, everybody.

4 Oh, Jerry, sorry.

5 BOARD MEMBER D'AMORE: Thank you. I went to sleep
6 last night happily in the camp of animal welfare, and at 3:30
7 this morning I woke up with a jerk that, wow, there's public-
8 private partnership in this as well, and that put me in a
9 tailspin. I didn't go back to sleep, got up and read this
10 again. And without going through a whole litany of things, I
11 will tell you that I cherish the public-private partnership. I
12 think it's strong. I know that if it's strong, it didn't get
13 there easily. That's a building process.

14 To wreck that process can be fast, and I probably
15 would be not in the position of saying, hey, I'm for this had I
16 not seen the willingness of this group to take responsibility
17 that we were a little loose with protocol perhaps, or procedure
18 perhaps. So having accepted that responsibility, I am full-
19 throated behind the process of getting this to the animals
20 again. Thank you.

21 BOARD MEMBER CALDWELL: Thanks, Jerry.

22 Kyla, I think that's it for the discussion, and it
23 was very thorough, and it needed to be very thorough. Kyla, we
24 need to classify this?

25 CHAIR SMITH: Yep. We'll start with the

1 classification motion. Do we have that slide?

2 BOARD MEMBER POWELL-PALM: Handed it back to the
3 program. I don't --

4 CHAIR SMITH: Okay. Thank you. So the
5 classification motion comes motioned and seconded from the
6 subcommittee. It was motioned by Nate Powell-Palm and seconded
7 by Kim, and the motion is to classify meloxicam as synthetic,
8 and we're going to start the vote with Franklin.

9 BOARD MEMBER QUARCOO: Yes.

10 BOARD MEMBER JEFFERY: Yes.

11 BOARD MEMBER POWELL-PALM: Yes.

12 BOARD MEMBER HUSEMAN: Yes.

13 BOARD MEMBER TURNER: Yes.

14 CHAIR SMITH: Wait, hold on, Jerry.

15 Logan?

16 BOARD MEMBER PETREY: Yes.

17 BOARD MEMBER D'AMORE: Yes.

18 BOARD MEMBER DIMITRI: Yes.

19 BOARD MEMBER NANDWANI: Yes.

20 BOARD MEMBER CALDWELL: Yes.

21 BOARD MEMBER JOHNSON: Yes.

22 SECRETARY LEWIS: Yes.

23 VICE CHAIR BRUCH: Yes.

24 CHAIR SMITH: Chair votes yes.

25 SECRETARY LEWIS: 14 yes, 0 no, 1 absent. The motion

1 carries.

2 CHAIR SMITH: Next, we're going to move to the
3 listing motion. Can you put the other slide up, please, with
4 the technical correction?

5 So we're going to vote on this motion to add
6 meloxicam, CAS #71125-38-7 at §205.603(a), as disinfectants,
7 sanitizers, and medical treatment as applicable in accordance
8 with approved labeling for organic livestock.

9 Also for use under 7 CFR Part 205, the NOP requires
10 (i) use by or on the lawful written order of a licensed
11 veterinarian; and (ii) a -- and then crossed out meat, so it
12 just reads a withdrawal period of at least two times that
13 required by the FDA.

14 I need a parliamentary thing here with this
15 amendment. Since it's not coming motioned and seconded in this
16 version, do we need to do a motion and second, or we can
17 proceed with this technical correction?

18 Everybody's nodding.

19 MS. ARSENAULT: I think you could do either. I think
20 if you want to do a friendly amendment, and you all agree this
21 is a non-substantive change, that's fine. Or you can motion
22 and second again if you want.

23 CHAIR SMITH: Do you guys just want to motion and
24 second again?

25 BOARD MEMBER POWELL-PALM: We could motion and second

1 again. So we motion the slide as presented, striking the word
2 meat, and having (ii) read a withdrawal period of at least two
3 times that required by the FDA.

4 BOARD MEMBER HUSEMAN: Second the motion.

5 CHAIR SMITH: Any further discussion?

6 Okay. Then the vote, we'll go with Mindee.

7 BOARD MEMBER JEFFERY: Yes.

8 BOARD MEMBER POWELL-PALM: Yes.

9 BOARD MEMBER HUSEMAN: Yes.

10 BOARD MEMBER TURNER: Yes.

11 CHAIR SMITH: Logan?

12 BOARD MEMBER PETREY: Yes.

13 BOARD MEMBER D'AMORE: Yes.

14 BOARD MEMBER DIMITRI: Abstain.

15 BOARD MEMBER NANDWANI: Yes.

16 BOARD MEMBER CALDWELL: Yes.

17 BOARD MEMBER JOHNSON: Yes.

18 SECRETARY LEWIS: Yes.

19 VICE CHAIR BRUCH: Yes.

20 CHAIR SMITH: Chair votes yes.

21 SECRETARY LEWIS: 13 yes --

22 BOARD MEMBER QUARCOO: Yes.

23 SECRETARY LEWIS: Oh, sorry.

24 CHAIR SMITH: Sorry. That was my fault. Sorry,

25 Franklin. We're dusting off the cobwebs here, guys.

1 SECRETARY LEWIS: 13 yes, 1 abstention, 1 absent.

2 The motion carries.

3 CHAIR SMITH: Okay. I'm handing it back to you,
4 Brian. We're going to go through the 2026 sunsets first, and
5 then we'll --

6 BOARD MEMBER POWELL-PALM: And real quick. I think
7 we actually have to vote to add it to the list now.

8 BOARD MEMBER CALDWELL: Right.

9 BOARD MEMBER POWELL-PALM: We just voted for the
10 amended language.

11 CHAIR SMITH: Oh.

12 BOARD MEMBER POWELL-PALM: Is that how everyone saw
13 that? Okay.

14 CHAIR SMITH: Sorry.

15 BOARD MEMBER POWELL-PALM: Don't mean to make you
16 vote again.

17 CHAIR SMITH: Sorry. Now we're voting. Okay.
18 Sorry. My bad. All right.

19 So now we're voting to add meloxicam, as just
20 motioned, and the vote starts with Nate.

21 BOARD MEMBER POWELL-PALM: Yes.

22 BOARD MEMBER HUSEMAN: Yes.

23 BOARD MEMBER TURNER: Yes.

24 CHAIR SMITH: Oh, Logan.

25 BOARD MEMBER PETREY: Yes.

1 BOARD MEMBER D'AMORE: Yes.

2 BOARD MEMBER DIMITRI: Abstain.

3 BOARD MEMBER NANDWANI: Yes.

4 BOARD MEMBER CALDWELL: Yes.

5 BOARD MEMBER JOHNSON: Yes.

6 SECRETARY LEWIS: Yes.

7 VICE CHAIR BRUCH: Yes.

8 BOARD MEMBER QUARCOO: Yes.

9 BOARD MEMBER JEFFERY: Yes.

10 CHAIR SMITH: Chair votes yes.

11 SECRETARY LEWIS: 13 yes, one abstention, 1 absent.

12 The motion carries.

13 CHAIR SMITH: Okay. There we go, guys. First one's
14 always rough.

15 Back to you, Brian. And again, we're going to do the

16 --

17 BOARD MEMBER CALDWELL: Sunsets?

18 CHAIR SMITH: -- sunsets first. Yep.

19 BOARD MEMBER CALDWELL: Great.

20 CHAIR SMITH: Do you want me to click through the
21 slides?

22 BOARD MEMBER CALDWELL: Yeah.

23 CHAIR SMITH: Okay. Nate, can I have the clicker
24 back?

25 BOARD MEMBER CALDWELL: All right. Well, thank you,

1 Kyla, and thank you all.

2 I don't think that this sets a -- that last process
3 sets a precedent except for the very clear message that we all
4 heard that process is important, transparency is important, and
5 maybe the PDS Subcommittee will take that under consideration
6 in some of the wording there about TRs. So thank you all.

7 We're going to move into the sunsets, and Franklin
8 has the first one which is atropine.

9 BOARD MEMBER QUARCOO: All right. So atropine. This
10 is listed under 205.603, we use as a disinfectant, sanitizer,
11 and medical treatment. I'm going to list some very important
12 things about atropine right from the beginning because I'll be
13 coming back to that.

14 It can only be used by or on the lawful written order
15 of a licensed veterinarian. It has to have a meat withdrawal
16 period of at least 56 days for livestock intended for
17 slaughter, and a milk discard period of at least 12 days after
18 the administration. So I want to start right off with that.

19 It is used to treat organophosphate poisoning. This is a
20 neurotoxin which, of course, affects the nervous system, and
21 it's used in that treatment for both human beings and animals.

22 The last TR was in 2019, and I'll start by saying how
23 it's produced. It is -- I know this sounds contradictory --
24 it's a naturally-occurring alkaloid, but then it's synthetic,
25 but I'll explain that. It is a racemic mixture that is made up

1 of two components. One of them rotates like to the left,
2 another to the right, but the one that rotates to the left is
3 the natural version of it. It comes from the plants in the
4 nightshade family.

5 So let me move on here. I've already talked about
6 the withdrawal period and how it is made. It is also
7 synthesized. This part is wholly synthetic in an acid-
8 catalyzed esterification reaction between tropine and tropic
9 acid.

10 International acceptance, it is accepted -- it's
11 allowed as a healthcare product in Canada. The European
12 Economic Community does not explicitly mention it. Codex does
13 not explicitly mention it. IFOAM does not mention it. And
14 Japan Agricultural Standard for Organic Production does not
15 explicitly mention it.

16 Ancillary substances, none. When it comes to this
17 alkaloid, especially one part of it -- the natural part -- is
18 easily broken down into tropine which is biodegradable.

19 So generally what I want to say about this is that,
20 considering the fact that it has to be administered only on the
21 written designation of a veterinarian, and the small quantities
22 used, it is not very likely to cause any environmental problem.
23 It also has a very short half-life and a whole range of things
24 that make me comfortable with this material. And both written
25 and oral comments so far have been very supportive of this

1 material, and the subcommittee has been on the side of keeping
2 it on the list.

3 So that's about all I have. If there are any
4 comments and discussions for me?

5 BOARD MEMBER CALDWELL: No questions or comments.

6 So Kyla, next, move ahead with the vote.

7 CHAIR SMITH: Okay. Great. The material comes
8 motioned and seconded from subcommittee. It was motioned by
9 Franklin and seconded by Brian. The motion is to remove
10 atropine from the National List, and you can see the listing
11 there, 205.603(a)3.

12 So the vote is going to start with Kim.

13 BOARD MEMBER HUSEMAN: No.

14 BOARD MEMBER TURNER: No.

15 CHAIR SMITH: Logan?

16 BOARD MEMBER PETREY: No.

17 BOARD MEMBER D'AMORE: No.

18 BOARD MEMBER DIMITRI: No.

19 BOARD MEMBER NANDWANI: No.

20 BOARD MEMBER CALDWELL: No.

21 BOARD MEMBER JOHNSON: No.

22 SECRETARY LEWIS: No.

23 VICE CHAIR BRUCH: No.

24 BOARD MEMBER QUARCOO: No.

25 BOARD MEMBER HUSEMAN: No.

1 BOARD MEMBER POWELL-PALM: No.

2 CHAIR SMITH: Chair votes no.

3 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

4 BOARD MEMBER CALDWELL: Okay. And Franklin also has
5 our next one, which is hydrogen peroxide.

6 BOARD MEMBER QUARCOO: All right. So this is also
7 listed under 205.603, as a disinfectant, sanitizer, and medical
8 treatment. The last year was in 2015. And I will go down the
9 list.

10 One of the things I want to mention right from the
11 beginning is hydrogen peroxide, because of the oxygen-oxygen
12 bond, it's very unstable. It quickly breaks down into water
13 and oxygen, and these products are things we are comfortable
14 with. So I'm going to summarize this and say that these are
15 some of the things that make me personally comfortable with it.

16 How is it produced? It's produced industrially
17 through what we call the anthraquinone auto-oxidation process.
18 There is a catalytic reduction reaction, and then it is
19 combined with other things, and then we get the anthraquinone
20 back, and then hydrogen peroxide is released.

21 When it comes to international acceptance, it's
22 accepted -- the Canadian General Standards Board accepts it.
23 The European Economic Community does not explicitly mention it,
24 and neither does Codex. It is allowed by IFOAM, and the Japan
25 Agricultural Standard allows it.

1 When it comes to ancillary substances, water is the
2 primary ingredient listed, but there is also salicylic acid,
3 phosphoric acid, acetic acid, and a few others. There is also
4 an alcohol, something in the alcohol family. The ancillary
5 substance is listed.

6 Hydrogen, when it comes to human health and
7 environmental issues, is unstable. It doesn't persist in the
8 environment for that oxygen-oxygen bond, so it quickly breaks
9 down. The breakdown products we know.

10 I will say that in human bodies, sometimes when
11 people are exposed to it and there is too much of it and it
12 breaks down into oxygen, putting bubbles in the blood system,
13 that could become a problem. But like most things, if you use
14 this product the way you're supposed to, that's not supposed to
15 happen if you follow all the precautionary measures and
16 everything.

17 I am comfortable with this. When I look at all the
18 -- there are some issues with some beneficial organisms in
19 soil, but the quantities that are used and if these things are
20 handled properly, that should not be a problem. It is actually
21 sometimes also used in treating wastewater, so it's actually
22 something we sometimes put in water to treat it. So generally,
23 it looks like a harmless product to me. It's generally
24 considered as safe. And that's about it.

25 There are other things here that are all part of the

1 report, but I want to keep this short. If there are any
2 questions, we'll take them.

3 BOARD MEMBER CALDWELL: All right. Questions about
4 hydrogen peroxide?

5 I don't see any questions.

6 CHAIR SMITH: Okay. The motion to remove hydrogen
7 peroxide from the National List comes motioned and seconded by
8 the subcommittee. It was motioned by Franklin and seconded by
9 Nate Powell-Palm. The material is listed at 205.605(a)15.

10 And the vote starts with Wood.

11 BOARD MEMBER TURNER: No.

12 CHAIR SMITH: Logan?

13 BOARD MEMBER PETREY: No.

14 BOARD MEMBER D'AMORE: No.

15 BOARD MEMBER DIMITRI: No.

16 BOARD MEMBER NANDWANI: No.

17 BOARD MEMBER CALDWELL: No.

18 BOARD MEMBER JOHNSON: No.

19 SECRETARY LEWIS: No.

20 VICE CHAIR BRUCH: No.

21 BOARD MEMBER QUARCOO: No.

22 BOARD MEMBER JEFFERY: No.

23 BOARD MEMBER POWELL-PALM: No.

24 BOARD MEMBER HUSEMAN: No.

25 CHAIR SMITH: Chair votes no.

1 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

2 BOARD MEMBER CALDWELL: Okay. Nate Lewis is going to
3 talk about iodine.

4 SECRETARY LEWIS: Okay. So iodine will be one of the
5 substances that we're going to be coming back to as part of our
6 annotation change schedule at the end of the subcommittee
7 section. So I'm going to use a summarized sunset process for
8 talking about the sunset vote on the current listing of iodine.

9 Iodine is listed at 205.603(a) and 205-603(b). It's
10 used as a topical treatment and sanitizer. Extremely important
11 for pre- and post-milking teat dips on milking dairy cows,
12 remains necessary in organic livestock production.

13 It was previously -- at the last sunset review -- the
14 previous board relisted it unanimously. The subcommittee has
15 recommended that it remain on the list unanimously. Public
16 comments generally supported keeping iodine and supported the
17 statement around it being a necessary element in organic
18 livestock production.

19 And I think with that, I'll turn it back to Brian for
20 moving to the vote.

21 BOARD MEMBER CALDWELL: Any questions about iodine?
22 Seeing none, Kyla.

23 CHAIR SMITH: Okay. The motion to remove iodine from
24 205.603(a) and 205.603(b) of the National List comes motioned
25 and seconded from the subcommittee. It was motioned by Nate

1 Lewis and seconded by Brian.

2 And the vote starts with Logan.

3 BOARD MEMBER PETREY: No.

4 BOARD MEMBER D'AMORE: No.

5 BOARD MEMBER DIMITRI: No.

6 BOARD MEMBER NANDWANI: No.

7 BOARD MEMBER CALDWELL: No.

8 BOARD MEMBER JOHNSON: No.

9 SECRETARY LEWIS: No.

10 VICE CHAIR BRUCH: No.

11 BOARD MEMBER QUARCOO: No.

12 BOARD MEMBER JEFFERY: No.

13 BOARD MEMBER POWELL-PALM: No.

14 BOARD MEMBER HUSEMAN: No.

15 BOARD MEMBER TURNER: No.

16 CHAIR SMITH: Chair votes no.

17 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

18 BOARD MEMBER CALDWELL: Okay. This one goes to me.

19 Magnesium sulfate, sometimes in the form known as Epsom salts.

20 I'm also going to use the summarized sunset process which

21 basically is -- well, I'll go through the provisions of that.

22 First of all, use. Magnesium sulfate is used for

23 multiple purposes in livestock, everything from electrolyte

24 balance to Epsom salts for soaking wounds and things like that.

25 Generally, the previous reviews and the TR indicate that it's

1 quite a benign substance. No negative impacts from its use.
2 And in 2019, the last time it was reviewed, the vote was
3 unanimous to relist it. The vote from the Livestock
4 Subcommittee this time around was unanimous to relist it.

5 In terms of the written comments, we had four in
6 support of relisting and none opposed. And there was some
7 question about whether natural sources of magnesium sulfate
8 could be used instead of synthetic sources, but our commenter
9 who commented about that didn't know of any natural sources
10 that were used for veterinary purposes.

11 So with that, any questions about magnesium sulfate?

12 And I see none.

13 CHAIR SMITH: Okay. Magnesium sulfate, the motion to
14 remove comes from the subcommittee. It was motioned by Brian
15 and seconded by Nate Lewis. This material is listed at
16 205.603(a)19.

17 And the vote starts with Jerry.

18 BOARD MEMBER D'AMORE: No.

19 BOARD MEMBER DIMITRI: No.

20 BOARD MEMBER NANDWANI: No.

21 BOARD MEMBER CALDWELL: No.

22 BOARD MEMBER JOHNSON: No.

23 SECRETARY LEWIS: No.

24 VICE CHAIR BRUCH: No.

25 BOARD MEMBER QUARCOO: No.

1 BOARD MEMBER JEFFERY: No.

2 BOARD MEMBER POWELL-PALM: No.

3 BOARD MEMBER HUSEMAN: No.

4 BOARD MEMBER TURNER: No.

5 CHAIR SMITH: Logan?

6 BOARD MEMBER PETREY: No.

7 CHAIR SMITH: Chair votes no.

8 BOARD MEMBER CALDWELL: Okay. Oh, go ahead.

9 I'm sorry.

10 SECRETARY LEWIS: Sorry. 14 no, 1 absent. The
11 motion fails.

12 BOARD MEMBER CALDWELL: Great. Thank you.

13 So Nate Powell-Palm, tell us about fenbendazole.

14 BOARD MEMBER POWELL-PALM: Fenbendazole. I tackled
15 this one with my partner here, Kim, combining our examination
16 with moxidectin.

17 Commenters were generally -- no new comments, fall
18 from spring. And so we're looking at an essential parasiticide
19 that's part of the toolbox for producers who are managing the
20 parasite load in mammals.

21 I think the big thing that I would like to sort of
22 pose for future exploration discussion is how we can help
23 better equip inspectors as well as farmers on what emergency
24 use is, how we understand it better, how we can describe it
25 better. I think about it as an inspector, we don't have a ton

1 of language to say I see a pasture eaten down to the nubbins,
2 and there is definitely some re-ingestion of the parasite life
3 cycle, and we want to write that up if we're going to be using
4 this parasiticide.

5 So generally it's a well-supported tool in the
6 toolbox. I want to thank Kim for just really taking the bull
7 by the horns this spring and giving us some great meetings with
8 different producers, veterinarians, folks who can help us try
9 to ideate on how we can improve the use of this material and
10 move towards a more holistic system where it's needed less and
11 less.

12 BOARD MEMBER HUSEMAN: Yeah, I'll just add one little
13 plug in here. In conjunction with fenbendazole and moxidectin,
14 let it be known that this community is moving forward. We
15 actually had ivermectin removed from the National List as it
16 wasn't as safe of an option for parasiticide control, and so I
17 think that helps to show our process.

18 Outside of that comment that was also mentioned in
19 support of relisting both of these, I feel like it's very
20 straightforward from the spring to now.

21 BOARD MEMBER CALDWELL: So we're going to just be
22 doing fenbendazole first, and then we'll move to moxidectin,
23 but they are often spoken about together because they're
24 similar in their use. So I like to call it Fenbend. It's much
25 easier for me.

1 BOARD MEMBER POWELL-PALM: It is.

2 BOARD MEMBER CALDWELL: Any questions about Fenbend?
3 Yes, Kyla?

4 CHAIR SMITH: Yes. I just wanted to also echo the
5 comments, Nate, about providing more guidance around what
6 emergency treatment is, and I know some comments asked for some
7 more clarification on that.

8 There is not a definition of emergency treatment in
9 the regulations, however there is a definition for routine use
10 of parasiticide. In the Terms Defined section, the regular,
11 planned, or periodic use of parasiticides, and then there is
12 obviously language in the practice standard around parasiticide
13 plans, and restrictions and prohibitions around using these
14 materials routinely.

15 And so I haven't looked at all the language side by
16 side, but it could be an opportunity to just align the language
17 because I think we go back and forth between routine use and
18 emergency, and I don't always just use that same terminology.
19 And so, to me in my mind, emergency use is the opposite of
20 routine use that is in the definition, and anyway so I just was
21 thinking that we could try to just align all the language in
22 the regulations, and that might be helpful. That's it.
23 Thanks.

24 BOARD MEMBER CALDWELL: Thanks, Kyla.
25 Nate?

1 SECRETARY LEWIS: Kyla said pretty much exactly what
2 I was going to say, but really just stressing that we already
3 have what we need in the regulation to prohibit the activities
4 that folks are concerned about, and I don't think we need to
5 spend time trying to come to an agreement on what constitutes
6 an emergency when the regulations are already pretty clear
7 about what types of activities shouldn't be allowed with the
8 use of these substances.

9 BOARD MEMBER CALDWELL: Allison?

10 BOARD MEMBER JOHNSON: Actually, I think there
11 probably is somewhere in between the two. Emergency to me is
12 very unusual and in response to some extenuating circumstances.
13 It's not like, well, I don't use it on this exact schedule, but
14 occasionally I like to do it not in response to some specific
15 event. So I do think there's actually some space between those
16 two points.

17 And in other drug use areas, that distinction
18 actually matters a lot, sort of a slippery slope toward routine
19 where you're not on a schedule that you're overusing. So we
20 don't have to figure that out today, but just to throw that
21 thought in there.

22 BOARD MEMBER CALDWELL: Okay. Any other questions,
23 comments?

24 I don't see any.

25 CHAIR SMITH: Okay. The motion to remove

1 fenbendazole from the National List comes motioned and seconded
2 out of the subcommittee. It was motioned by Nate Powell-Palm
3 and seconded by Nate Lewis. And the material is listed at
4 205.603(a)23(i).

5 And Carolyn are you starting this vote? Carolyn, the
6 vote starts with you.

7 BOARD MEMBER DIMITRI: No.

8 BOARD MEMBER NANDWANI: No.

9 BOARD MEMBER CALDWELL: No.

10 BOARD MEMBER JOHNSON: No.

11 SECRETARY LEWIS: No.

12 VICE CHAIR BRUCH: No.

13 BOARD MEMBER QUARCOO: No.

14 BOARD MEMBER JEFFERY: No.

15 BOARD MEMBER POWELL-PALM: No.

16 BOARD MEMBER HUSEMAN: No.

17 BOARD MEMBER TURNER: No.

18 CHAIR SMITH: Logan?

19 BOARD MEMBER PETREY: No.

20 BOARD MEMBER D'AMORE: No.

21 CHAIR SMITH: Chair votes no.

22 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

23 BOARD MEMBER CALDWELL: Okay. And moxidectin, Kim.

24 BOARD MEMBER HUSEMAN: Unless there's any discussion,
25 I think we're okay to vote. Sorry, we're trying to present

1 them together as one is an alternative to the other, and I can
2 see that it's kind of geographical, it's what's at use
3 depending on what's available regionally, et cetera, et cetera.
4 So as far as the write-up, they're forcing you.

5 BOARD MEMBER CALDWELL: Okay. Any questions about
6 moxidectin?

7 CHAIR SMITH: I'll just say ditto as what I said the
8 last time about definitions and emergency use, just so that
9 it's on the record.

10 And I appreciate, Allison, your comments that it's a
11 spectrum. I think that was certainly a good point.

12 BOARD MEMBER CALDWELL: So I have a quick question
13 that is are those the only two parasiticides in the toolbox? I
14 can't remember. Sorry.

15 CHAIR SMITH: So ivermectin was removed. It was on
16 the National List but it's been since removed.

17 BOARD MEMBER CALDWELL: Great. And you always want
18 more than one material to prevent resistance buildup within the
19 animals, so just wanted to point that out.

20 BOARD MEMBER POWELL-PALM: Absolutely. Thank you for
21 that.

22 BOARD MEMBER CALDWELL: So Kyla.

23 CHAIR SMITH: Okay. So the motion to remove
24 moxidectin from the National List comes motioned and seconded
25 out of the subcommittee. It was motioned by Kim and seconded

1 by Nate Lewis, and it's listed at 205.603(a)23(ii).

2 And the vote starts with Dilip.

3 BOARD MEMBER NANDWANI: No.

4 BOARD MEMBER CALDWELL: No.

5 BOARD MEMBER JOHNSON: No.

6 SECRETARY LEWIS: No.

7 VICE CHAIR BRUCH: No.

8 BOARD MEMBER QUARCOO: No.

9 BOARD MEMBER JEFFERY: No.

10 BOARD MEMBER POWELL-PALM: No.

11 BOARD MEMBER HUSEMAN: No.

12 BOARD MEMBER TURNER: No.

13 CHAIR SMITH: Logan?

14 BOARD MEMBER PETREY: No.

15 BOARD MEMBER D'AMORE: No.

16 BOARD MEMBER DIMITRI: No.

17 CHAIR SMITH: Chair votes no.

18 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

19 BOARD MEMBER CALDWELL: Okay. Nate Lewis, peracetic
20 acid.

21 SECRETARY LEWIS: Okay. For peracetic acid I will
22 also be using the summarized sunset process. Give me a second
23 to get to this page. Peracetic acid, also known as
24 peroxyacetic acid, is listed at 205.603(a) as a disinfectant
25 sanitizer. It is a necessary element in organic livestock

1 production. It's used for sanitizing facility and processing
2 Equipment.

3 The substance was unanimously relisted at its last
4 sunset review, unanimously passed out of the subcommittee for
5 this sunset review to remain on the list, and all the written
6 and oral comments we received regarding PAA, peracetic acid,
7 were in support of its continued listing as an important
8 sanitizing tool for organic livestock producers.

9 I'll turn it back to Brian to then turn it to Kyla
10 for the vote.

11 BOARD MEMBER CALDWELL: Okay. Any questions for
12 Nate?

13 I don't see any. Again, I will just point out that
14 having an array of sanitizers is also really critical, sort of
15 for the same reasons that I just gave with parasiticides. We
16 really need multiple materials to be able to rotate and to keep
17 everything working well.

18 So, yeah. Thanks, Kyla.

19 CHAIR SMITH: Okay. The motion to remove peracetic
20 acid from the National List comes motioned and seconded out of
21 subcommittee. It was motioned by Nate and seconded by Brian.

22 And the vote starts with Brian.

23 BOARD MEMBER CALDWELL: No.

24 BOARD MEMBER JOHNSON: No.

25 SECRETARY LEWIS: No.

1 VICE CHAIR BRUCH: No.

2 BOARD MEMBER QUARCOO: No.

3 BOARD MEMBER JEFFERY: No.

4 BOARD MEMBER POWELL-PALM: No.

5 BOARD MEMBER HUSEMAN: No.

6 BOARD MEMBER TURNER: No.

7 CHAIR SMITH: Logan?

8 BOARD MEMBER PETREY: No.

9 BOARD MEMBER D'AMORE: No.

10 BOARD MEMBER DIMITRI: No.

11 BOARD MEMBER NANDWANI: No.

12 CHAIR SMITH: Chair votes no.

13 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

14 BOARD MEMBER CALDWELL: Great. We're moving along
15 nicely. Nate Powell-Palm, xylazine.

16 BOARD MEMBER POWELL-PALM: We put xylazine and
17 tolazine -- we basically updated the order that these materials
18 are reviewed because they are married together. One is a
19 counteractant to the other.

20 Again, we're going to be using it for an anesthetic.
21 And in the reminder for how these materials are used, again, we
22 have AMDUCA, our favorite acronym of the meeting. And so
23 that's going to be administered in the direct relationship with
24 a licensed veterinarian.

25 Any questions?

1 BOARD MEMBER CALDWELL: Okay. Questions for Nate?

2 I don't see any.

3 So we're going to, again, just do the xylazine first,
4 then tolazine after.

5 BOARD MEMBER POWELL-PALM: Yes, please.

6 CHAIR SMITH: Okay. The motion to remove xylazine
7 from the National List comes motioned and seconded out of
8 subcommittee. It was a motion by Nate Powell-Palm and seconded
9 by Kim. The listing is at 205.603(a)30.

10 And the vote starts with Allison.

11 BOARD MEMBER JOHNSON: No.

12 SECRETARY LEWIS: No.

13 VICE CHAIR BRUCH: No.

14 BOARD MEMBER QUARCOO: No.

15 And the vote starts with Allison.

16 BOARD MEMBER JOHNSON: No.

17 SECRETARY LEWIS: No.

18 VICE CHAIR BRUCH: No.

19 BOARD MEMBER QUARCOO: No.

20 BOARD MEMBER JEFFERY: No.

21 BOARD MEMBER POWELL-PALM: No.

22 BOARD MEMBER HUSEMAN: No.

23 BOARD MEMBER TURNER: No.

24 CHAIR SMITH: Logan?

25 BOARD MEMBER PETREY: No.

1 BOARD MEMBER D'AMORE: No.

2 BOARD MEMBER DIMITRI: No.

3 BOARD MEMBER NANDWANI: No.

4 BOARD MEMBER CALDWELL: No.

5 CHAIR SMITH: Chair votes no.

6 SECRETARY LEWIS: 14, no, 1 absent. The motion
7 fails.

8 BOARD MEMBER CALDWELL: And tolazine, a few comments
9 on exactly how tolazine relates to xylazine.

10 BOARD MEMBER POWELL-PALM: Yeah, so one is going to
11 be to draw the anesthetic out, so one is going to be the
12 counteractant to the other.

13 BOARD MEMBER CALDWELL: Okay. Amy?

14 VICE CHAIR BRUCH: Oh, it's a comment, not a
15 question.

16 BOARD MEMBER POWELL-PALM: Go ahead.

17 VICE CHAIR BRUCH: I'm glad to see that these two
18 substances are paired in the review. That was something that
19 we worked on continuous improvement from our stakeholder
20 community, so I'm appreciative of being able to review these in
21 tandem. Thank you.

22 BOARD MEMBER POWELL-PALM: Thank you.

23 BOARD MEMBER CALDWELL: Okay. No further questions.

24 CHAIR SMITH: Okay. The motions to remove tolazine
25 from the National List comes motioned and seconded out of

1 subcommittee. It was motioned by Nate Powell-Palm, and
2 seconded by Kim.

3 The vote starts with Nate Lewis.

4 SECRETARY LEWIS: No.

5 VICE CHAIR BRUCH: No.

6 BOARD MEMBER QUARCOO: No.

7 BOARD MEMBER JEFFERY: No.

8 BOARD MEMBER POWELL-PALM: No.

9 BOARD MEMBER HUSEMAN: No.

10 BOARD MEMBER TURNER: No.

11 CHAIR SMITH: Logan?

12 BOARD MEMBER PETREY: No.

13 BOARD MEMBER D'AMORE: No.

14 BOARD MEMBER DIMITRI: No.

15 BOARD MEMBER NANDWANI: No.

16 BOARD MEMBER CALDWELL: No.

17 BOARD MEMBER JOHNSON: No.

18 CHAIR SMITH: Chair votes no.

19 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

20 BOARD MEMBER CALDWELL: Okay. Just to reiterate --
21 it's been said many times -- but animal health and welfare is
22 so important, and I'm really glad to see that we're keeping up
23 our end of that whole part.

24 So Kim, tell us about oxalic acid.

25 BOARD MEMBER HUSEMAN: All right. So when we speak

1 of livestock, I don't think bees come to mind, but here we are.

2 So oxalic acid dihydrate, it is used -- so we talk
3 about parasiticides, and you asked are there any other
4 parasiticides? And I guess I did misspeak because it is used
5 as a parasiticide specifically for apiculture. And through our
6 spring and through this fall, I want it to be known that there
7 are not apiculture standards, and with the lack of a standard
8 this comes into question.

9 However, I'd like to point out that I think future
10 boards should consider what I like to call mind of the p's and
11 q's inside of the livestock silo of -- stick with me here --
12 apiculture, p, aquaculture, q, and find a way to help bring
13 these two aspects to light within the livestock community.
14 This would not be Nate and I's expertise, just so you know, but
15 I do feel like that should be future board work is to bring
16 both of those to light.

17 With that being said, subcommittee has voted out
18 unanimously in previous reviews. This has been voted on
19 unanimously to remain on the National List.

20 BOARD MEMBER CALDWELL: Thank you, Kim.

21 Any questions?

22 Allison.

23 BOARD MEMBER JOHNSON: I'll just echo that I heard
24 Dr. Tucker say recommendations don't have expiration dates.
25 And so some of these ones that have been sitting there for a

1 while like seed, we heard a lot last meeting that this is an
2 issue we want to move on, and we were able to bring it back to
3 life at this meeting. So I would sort of put a call out to
4 those of you who are looking at some of these sectors that have
5 been given thought in the past and haven't received much
6 attention lately, let us know what you'd like the Board to
7 prioritize, and maybe we can breathe some life back into some
8 of these older recommendations.

9 BOARD MEMBER CALDWELL: Great comment. Thank you,
10 Allison.

11 Okay. Oh, sorry, Nate. Yes.

12 SECRETARY LEWIS: Yeah, I just wanted to point out
13 that I think there's a spectrum of comfort with voting on
14 materials for production systems that we do not have standards
15 yet for. And so I just want to note that the materials that
16 were being reviewed for aquaculture have been tabled sort of
17 indefinitely until we have aquaculture standards but yet boards
18 previous to this and at least in this subcommittee -- we'll see
19 what happens with this vote -- seem comfortable keeping tools
20 available to producers for apiculture when we don't really have
21 an apiculture standard quite yet. So just sort of noting that
22 there is a spectrum of comfort with voting on substances for
23 systems that we do not yet have standards.

24 BOARD MEMBER CALDWELL: Yeah, thanks, Nate. And just
25 to follow up on that very quickly, oxalic acid is a very

1 environmentally benign substance, and so that might be one
2 reason why we can move ahead with it even though we don't have
3 those specific full set of standards, so yeah.

4 Any other questions, comments?

5 I don't see any, Kyla.

6 CHAIR SMITH: Okay. The motion to remove oxalic acid
7 dihydrate from the National List comes motioned and seconded
8 from the subcommittee. It was motioned by Kim and seconded by
9 Nate.

10 And the vote starts with Amy.

11 VICE CHAIR BRUCH: No.

12 BOARD MEMBER QUARCOO: No.

13 BOARD MEMBER JEFFERY: No.

14 BOARD MEMBER POWELL-PALM: No.

15 BOARD MEMBER HUSEMAN: No.

16 BOARD MEMBER TURNER: No.

17 CHAIR SMITH: Logan?

18 BOARD MEMBER PETREY: No.

19 BOARD MEMBER D'AMORE: No.

20 BOARD MEMBER DIMITRI: No.

21 BOARD MEMBER NANDWANI: No.

22 BOARD MEMBER CALDWELL: No.

23 BOARD MEMBER JOHNSON: No.

24 SECRETARY LEWIS: No.

25 CHAIR SMITH: Chair votes no.

1 14 no, 1 absent. The motion fails.

2 BOARD MEMBER CALDWELL: Okay. We've had some smooth
3 sailing here, but now we're going to talk about methionine. So
4 Nate Powell-Palm, take us through that one.

5 BOARD MEMBER POWELL-PALM: I'm not going to say that
6 this isn't going to be smooth. I have high hopes for how much
7 we've talked about this.

8 For this material I really appreciate how much public
9 comment we got and how the public comment has evolved over nine
10 years now. When we think about where we were in 2015, where
11 we're at today, it's a very, I think, nuanced and considered
12 discussion.

13 So DL-methionine, essential amino acid, in order to
14 help a chicken produce the 300 eggs a year that we ask her to
15 while also being vegetarian fed, which is a high bar. When I
16 think about whether or not you'd find a clutch of 300 eggs in
17 the wild, very unlikely. That's going to be a lot of bugs that
18 those birds are going to have to seek out.

19 And so I'm deeply grateful that we have, as a
20 community, identified that there's a lot of good that this
21 material brings, and we really like our eggs. And so to keep
22 those chickens happy, keep them pumping, keep animal welfare
23 really high, I think I have mentioned this before but as an
24 early inspector I was so struck when a Mennonite farmer said,
25 if you really want to hear the sound of hell, you're going to

1 limit DL-methionine and listen to the chickens, as they will go
2 nuts. There will be cannibalism, they'll be incredibly
3 agitated. And so when we think about how we are doing, again,
4 our part to make sure that we're trying to steward our animals
5 as best we can, this is an essential material.

6 Any questions?

7 BOARD MEMBER CALDWELL: Kim?

8 BOARD MEMBER HUSEMAN: I really appreciate the way
9 you framed that up, Nate. And maybe this isn't so much of a
10 question as it's a shout out to the community of nutritionists,
11 the folks that are putting together these diets, these complex
12 diets in this organic system. I commend you and the work that
13 you're having to do. And having DL-methionine on the National
14 List is supportive of that nutritionist community. So I just
15 want to make that comment.

16 BOARD MEMBER CALDWELL: Thanks, Kim.

17 Nate Lewis?

18 SECRETARY LEWIS: Yeah, I just want to point out that
19 we'll be bringing DL-methionine back at the end of the sunsets
20 to discuss the proposal to remove the restrictions, so we can
21 keep talking about DL-methionine. This is -- if I'm correct,
22 Nate -- just the continue status quo, right?

23 BOARD MEMBER POWELL-PALM: Correct. The sunset,
24 yeah.

25 BOARD MEMBER CALDWELL: All right. Okay, thanks.

1 CHAIR SMITH: Okay. The motion to remove DL-
2 methionine from the National List comes motioned and seconded
3 out of subcommittee. It was motioned by Nate Powell-Palm and
4 seconded by Nate Lewis. The listing is at 205.603(d)1.

5 And the vote starts with Franklin.

6 BOARD MEMBER QUARCOO: No.

7 BOARD MEMBER JEFFERY: No.

8 BOARD MEMBER POWELL-PALM: No.

9 BOARD MEMBER HUSEMAN: No.

10 BOARD MEMBER TURNER: No.

11 CHAIR SMITH: Logan?

12 BOARD MEMBER PETREY: No.

13 BOARD MEMBER D'AMORE: No.

14 BOARD MEMBER DIMITRI: No.

15 BOARD MEMBER NANDWANI: No.

16 BOARD MEMBER CALDWELL: No.

17 BOARD MEMBER JOHNSON: No.

18 SECRETARY LEWIS: No.

19 VICE CHAIR BRUCH: No.

20 CHAIR SMITH: Chair votes no.

21 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

22 BOARD MEMBER CALDWELL: Okay. Moving on to trace
23 minerals, which is me. Again, I'm going to use the -- well,
24 no, I'm not going to use a summarized sunset process on this.
25 We need a little more discussion than that.

1 The use of trace minerals is to supplement livestock
2 rations which may sometimes be deficient in specific minerals,
3 and a very benign set of substances, and they provide an
4 inexpensive and very effective way to prevent deficiencies, and
5 they're used in small quantities, nonetheless.

6 So once again, this was unanimous to remain -- to be
7 retained on the list in 2019, last time it was reviewed. It
8 was recommended unanimously by this Livestock Subcommittee for
9 renewal.

10 However, I wanted to address very quickly some of the
11 written comments. There were four to retain trace minerals on
12 the National List, and none to drop it. But there was a
13 suggestion that the annotation -- there could be an annotation
14 that producer must document a need for trace minerals.

15 And there's really a problem with that, and that is
16 that unfortunately once you document a need you have done
17 serious damage to your animals and put them under a lot of
18 stress, and so I really don't think that that is a wise and
19 sort of proactive way to manage your animals.

20 And there are times in the season when various types
21 of forages and feeds may be deficient, and we're adding very
22 small amounts of trace minerals which can be done free choice
23 or can be incorporated into the ration. But anyways, they
24 provide a huge service at an extremely small environmental cost
25 which is just in their production of these small quantities,

1 and no downside of their use.

2 So with that, any questions?

3 Nate?

4 SECRETARY LEWIS: Just a comment that there's also a
5 geographic aspect to this that certain soils are deficient in
6 certain minerals just because of where you are. And so, for
7 example, here in the Maritime Northwest we are perennially
8 deficient in selenium. It's not something that any kind of
9 organic management practice on your land could resolve. So a
10 mineral supplement for selenium is essential and necessary
11 here.

12 BOARD MEMBER CALDWELL: Yeah, great point.

13 Amy?

14 VICE CHAIR BRUCH: Yeah, Brian, I didn't have a
15 question, just a comment. And I think that's really great to
16 highlight -- both in livestock and in crops -- when we see a
17 deficiency, it is too late essentially. So I thought that that
18 was a really good key point about the proactiveness that's
19 needed from producers on some of these materials.

20 And then a little anecdote. My soil scientist,
21 Neal Kinsey, mentioned that livestock actually is the best
22 biochemist because they know exactly what they're deficient in
23 -- as Nate was saying -- and they do go or want to go to the
24 pastures or to the mineral bins of the elements that they're
25 deficient in. I wish as humans we did this. I tend to

1 gravitate towards other things. But I do know in the livestock
2 world it is pretty phenomenal what they can do to self-balance
3 their bodies when they're given the opportunity. Thank you.

4 BOARD MEMBER CALDWELL: I don't see any other
5 comments or questions.

6 CHAIR SMITH: Okay. The motion to remove trace
7 minerals from the National List comes motioned and seconded out
8 of subcommittee. It was motioned by Brian and seconded by
9 Nate Powell-Palm. The listing is at 205.603(d)2.

10 And the vote starts with Mindee.

11 BOARD MEMBER JEFFERY: No.

12 BOARD MEMBER POWELL-PALM: No.

13 BOARD MEMBER HUSEMAN: No.

14 BOARD MEMBER TURNER: No.

15 CHAIR SMITH: Logan?

16 BOARD MEMBER PETREY: No.

17 BOARD MEMBER D'AMORE: No.

18 BOARD MEMBER DIMITRI: No.

19 BOARD MEMBER NANDWANI: No.

20 BOARD MEMBER CALDWELL: No.

21 BOARD MEMBER JOHNSON: No.

22 SECRETARY LEWIS: No.

23 VICE CHAIR BRUCH: No.

24 BOARD MEMBER QUARCOO: No.

25 CHAIR SMITH: Chair votes no.

1 SECRETARY LEWIS: 14 no, 1 absent. The motion fails.

2 BOARD MEMBER CALDWELL: All right. And moving along
3 to vitamins. Vitamins, in a lot of ways, have the same kind of
4 considerations that trace minerals have. Their use is, of
5 synthetic vitamins, is to supplement rations, again, to prevent
6 deficiencies.

7 And once again, vitamins were unanimously recommended
8 to remain on the National List in 2019 when they were last
9 reviewed. They were unanimously recommended to move forward on
10 the list from this Livestock Subcommittee. They are
11 essentially for good animal health, and again, basically very
12 similar in needs and uses, small amounts mixed into rations to
13 prevent deficiencies in various livestock species.

14 In our written comments for this session we had three
15 in favor of relisting, zero against, and one with a request for
16 annotation to restrict the synthetic vitamins only to vitamins
17 A, C, and D. However, looking closely at the last technical
18 review, which was done in 2015, poultry in particular can be
19 deficient in the B vitamins, so not allowing them would really
20 put, once again, our poultry producers in a bad place. So I
21 just don't think we should move ahead with that, and we don't
22 need to make an annotation to pass this sunset review.

23 But there's a big issue with vitamins, and that is
24 that according to the new TR -- which we just had a partial TR
25 done recently with very specific questions about excluded

1 methods in the production of synthetic vitamins -- some of them
2 -- almost all of them -- are made in foreign countries, and
3 some of them, according to the TR, have a very high probability
4 of being made with excluded methods, and that would be part of
5 the fermentation process to produce something like, for
6 instance, vitamin C.

7 And so the question arises, okay, so what do we do
8 about that? The responses from certifiers that we got was that
9 they can use an affidavit to get an assurance that these
10 constituents to a feed mix were not produced with excluded
11 methods. I think that that is a little bit weak, but that's
12 what we've got for now.

13 And another comment which I thought was really well
14 taken was that fermentation, in general, in the handling
15 discussions -- and there are some other aspects where
16 fermentation is used -- also have this same issue, and it's
17 really part of the same big discussion, and that the Board
18 should have a more comprehensive discussion and consideration
19 and analysis of how to work with all the aspects of where
20 excluded methods could be impacting practices and materials
21 that we want to use.

22 So that hasn't happened yet, and it's going to be
23 another one of these very difficult topics. And I want to
24 applaud this board for taking the bull by the horns -- and the
25 Livestock Committee -- and really trying to move forward on

1 some of these very difficult topics which, if you let them just
2 lay, they will fester, and they will come back to haunt you
3 later. So the sooner we can try to move forward and really
4 thoughtfully consider these, with your help, our stakeholders,
5 that input is of course again crucial.

6 Long story short, we're going to work on this, but in
7 the meantime our animals need vitamins, and we do have an
8 affidavit option, which provides us protection for now.

9 So with that, any questions about synthetic vitamins
10 for livestock?

11 Jerry?

12 BOARD MEMBER D'AMORE: Not a question, just a
13 comment. I feel your pain that the fermentation process, and
14 going back and looking at only an affidavit does make one feel
15 a little unstable, but tied in with the risk-based assessment
16 process, too, that I find to be helpful and comforting. Thank
17 you.

18 BOARD MEMBER CALDWELL: Great. Thanks, Jerry.

19 Mindee?

20 BOARD MEMBER JEFFERY: Thank you so much for the
21 depth of your commitment to doing this work, Brian. I really
22 appreciate you.

23 So to clarify, do you see a path forward for working
24 on an annotation for vitamins at this point, or do you think it
25 indicates we go to fermentation first?

1 BOARD MEMBER CALDWELL: Yeah, I don't think we're
2 ready at this point. I think we really need to have that
3 broader discussion. I don't know exactly how wide it can be,
4 but there's the question of microbes that are added to compost
5 which is another near and dear topic. So yeah, we need to do a
6 lot of work on this, and we're not ready to make any
7 annotations, I don't think, at this point.

8 BOARD MEMBER JEFFERY: So fermentation first before
9 Livestock takes up an annotation change for this particular
10 substance?

11 BOARD MEMBER CALDWELL: I think that's a good --
12 yeah.

13 BOARD MEMBER JEFFERY: Thank you.

14 BOARD MEMBER CALDWELL: Nate Powell-Palm?

15 BOARD MEMBER POWELL-PALM: Just wanted to thank you,
16 Brian, for the amount of time you've sat with us and the
17 attention you've given it while also allowing us to carry on as
18 producers -- that we're not seeing those as exclusive, we're
19 going to work on them, but it's also not going to come at the
20 expense of the welfare of our producers.

21 BOARD MEMBER CALDWELL: Great. Any other questions?

22 I don't see any, Kyla.

23 CHAIR SMITH: Okay. The motion to remove vitamins
24 from the National List comes motioned and seconded out of
25 subcommittee. It was motioned by Brian and seconded by

1 Nate Lewis. The listing is at 205.603(d)3.

2 And the vote starts with Nate.

3 BOARD MEMBER POWELL-PALM: No.

4 BOARD MEMBER HUSEMAN: No.

5 BOARD MEMBER TURNER: No.

6 CHAIR SMITH: Logan?

7 BOARD MEMBER PETREY: No.

8 BOARD MEMBER D'AMORE: Jerry, No.

9 BOARD MEMBER DIMITRI: No.

10 BOARD MEMBER NANDWANI: No.

11 BOARD MEMBER CALDWELL: No.

12 BOARD MEMBER JOHNSON: No.

13 SECRETARY LEWIS: No.

14 VICE CHAIR BRUCH: No.

15 BOARD MEMBER QUARCOO: No.

16 BOARD MEMBER JEFFERY: No.

17 CHAIR SMITH: Chair votes no.

18 SECRETARY LEWIS: 14-no, 1 absent. The motion fails.

19 BOARD MEMBER CALDWELL: Okay. Once again, we're
20 going to look at methionine, in terms of an annotation change,
21 and Nate Lewis will lead us through that. Or is it Nate --
22 yeah. Okay, yeah, thanks.

23 SECRETARY LEWIS: All right. Thanks. I want to get
24 this annotation change right. I feel like the use of
25 annotations in some previous boards have -- it might be a

1 little extreme to say -- but were weaponized to purposefully
2 move forward a particular agenda. And so just for the sake of
3 the Board and continuous improvement I want to make sure we get
4 this process right.

5 So with DL-methionine -- and again, I want to
6 acknowledge that there were some in the community that appeared
7 caught off guard that we were working on this -- and I want to
8 assure them that that message was heard and that we are working
9 on ensuring full transparency on intentions as we add
10 annotation changes back to the sunset process as a parallel
11 track. So I wanted to just start off with that first.

12 And I also want to start off that this is a very
13 deeply personal matter to me. I am an organic poultry producer
14 myself, and the welfare of our flocks are paramount, so that's
15 really what's fueling my interest in having this conversation
16 related to the annotation that we currently have.

17 So currently DL-methionine is annotated to limit its
18 inclusion to two pounds per ton of feed for layers, two-and-a-
19 half pounds per ton for broilers, and three pounds per ton for
20 turkeys, and this limit is designed to put pressure on the
21 industry to develop and adopt alternative practices and feed
22 additives that are not synthetic amino acids.

23 Summary of the effects of this current annotation, we
24 have an increased reliance on soybean meal and high protein
25 levels, so as you're balancing your poultry ration, the poultry

1 need their certain amount of methionine, and soybeans being
2 kind of a magical -- not a grain, is it a pulse, help me.

3 Pulse crop? Soybeans are pulse crops? Legumes?

4 As a magical legume crop, it has sort of natural high
5 levels of methionine, so in order to get the methionine levels
6 up, the protein levels need to be higher than what's ideal.
7 When you feed extra protein, you can run into some challenges
8 related to ammonia management in the houses which has potential
9 health effects on the birds themselves and the workers working
10 with the flocks.

11 And, as I mentioned, because of this reliance on
12 soybeans, there's less flexibility in feed ingredient options.
13 So we heard in public comments that corn and soybeans are an
14 anchor which has a sort of a double-edged sword. It's a good
15 thing to have that stable market for your crops, but because of
16 the reliance on soybean in particular for the protein needs,
17 some of the rotation crops that folks are excited about growing
18 -- sunflowers, camelina, canola, et cetera -- are not really
19 options for poultry operations because they're needing to meet
20 methionine requirements, and they have less flexibility there.

21 When methionine deficiencies come out in flocks, the
22 effects are dramatic and really offensive. So inadequate
23 levels of methionine can lead to poor muscle and organ growth,
24 nervousness, pecking and cannibalism, and sudden death.

25 We have heard from poultry operations that the

1 current annotation is working or they're making it work,
2 really, so that means that they're avoiding much of these
3 effects, but any deviation from that can result in some pretty
4 profound health effects on the birds. We know that animal
5 welfare is one of the most important aspects of why consumers
6 choose organic, and I think that should be part of our
7 consideration on this annotation change today.

8 Inadequate levels of methionine also can lead to
9 reductions in production, and so I want to address that head on
10 that this is not because methionine is a growth promoter. It's
11 because when birds are in poor health, they produce less. They
12 grow slower, they produce less eggs, and so it's a competitive
13 disadvantage for U.S. producers who are the only producers in
14 the organic kind of global marketplace with this restriction.

15 The rationale for removing the methionine restriction
16 -- which is what this motion is -- is, as I've described,
17 limiting methionine has a negative impact on bird health. It
18 does not align with international trading partners. Canada
19 allows methionine and lysine in monogastric livestock -- so
20 monogastrics, those are animals with one stomach, not like
21 cows, sheep, and goats who are ruminant animals with multiple
22 stomachs that can digest grass and create their own protein.
23 Monogastrics need to be provided with a full suite of essential
24 amino acids. These are primarily pigs and chickens.

25 So Canada allows synthetic methionine and lysine to

1 those livestock, but does include a preference for natural
2 options. When those natural options don't meet the nutritional
3 requirements of the livestock, the synthetic amino acids are
4 available for use. The EU takes a slightly different approach
5 to allowance of feed. They'll provide an allowance for
6 conventional feed to be fed to organic livestock and poultry,
7 which allows the inclusion of ingredients that are not
8 available to U.S. producers because of our 100 percent organic
9 diet requirement. That's part of the regulation.

10 We heard some comments -- and I know personally as a
11 livestock producer that feeds poultry -- this limitation on
12 methionine adds to the certification burden on producers,
13 inspectors, and certifiers. So when an inspector is at a
14 poultry operation, one of their biggest jobs -- not one of
15 their biggest -- one of their jobs is to ensure that the feed
16 is compliant which includes some calculations, which can get
17 complicated and lengthy, and the time of an inspection is
18 limited, so they need to triage what compliance points they're
19 going to be looking at.

20 And then this limit on methionine, which has been in
21 place since the initial allowance of the substance, does not
22 seem to have hastened the development of natural alternatives.
23 When I look back on the transcripts from the past when there
24 was discussion of it, guess what was being talked about? Black
25 soldier fly larva, and insects, and natural fermentation

1 products, and yeasts.

2 So we're having the same conversation 20 years later.
3 I think we have made some dramatic improvements. But we heard
4 from the insect industry just at this meeting that they're
5 stuck in a regulatory pickle, so to speak, where their products
6 are not eligible for organic certification but need to be
7 organic in order to be included in an organic livestock ration.

8 So while I think insects do have promise, they're not
9 currently available, poultry producers are not currently
10 including them in their rations, so there's no track record,
11 and I do not believe there's been any research into whether
12 consumers are willing to accept an organic egg or poultry
13 product that was fed on insects. I think that there's a lot of
14 merit to there, and I do not want to discourage that
15 development, but we don't have the research and track record
16 yet to point to insects as the replacement for synthetic
17 methionine -- the full-on replacement.

18 I talked a little bit about public comments, but just
19 to summarize what we heard at this meeting, certifiers and
20 trade groups are generally supportive of removing the
21 restriction because the verification process is time-consuming,
22 and inspectors can focus on other areas of compliance
23 verification at inspection. Producers generally support
24 removing the restriction to allow for more easily providing
25 balanced rations and increasing animal welfare.

1 There were some consumer groups opposing removing the
2 restriction because they feel that some restrictions -- we do
3 need some restrictions in order to continue pushing the
4 industry to finding and adopting natural alternatives. And
5 then I have already spoken about the non-organic insect
6 producers' opposition to it.

7 So here's the proposed annotation change. It would
8 be to remove all the language in red and strikethrough, and so
9 that the listing for DL-methionine would read, DL-methionine
10 for use only in organic poultry production -- removing the
11 pounds per ton restriction dependent on breed and species.

12 And with that, I will turn it back over to Brian to
13 facilitate a discussion.

14 BOARD MEMBER CALDWELL: Okay. Any questions for
15 Nate?

16 Allison?

17 BOARD MEMBER JOHNSON: I have two questions. The
18 first was, in a public comment, someone mentioned the incentive
19 for feed producers to over-include methionine in blended
20 products and alluded to the lack of strong competition in feed
21 markets, that smaller producers may really not have much choice
22 about the blend that ends up in an organic-compliant product.

23 So what is the downside to overfeeding methionine?
24 If we're getting a little too much in those rations, is that a
25 problem?

1 SECRETARY LEWIS: Great question. I think I would
2 question the assumption that removing the restriction would
3 lead to overfeeding of methionine. It's an extremely expensive
4 element of any mixed ration, and it's usually included in some
5 sort of pre-mix.

6 So I think it would be the methionine manufacturers
7 themselves who might be the ones to gain from that, but feed
8 mills in general I don't believe are going to be marking up the
9 methionine aspect for some sort of profit or gain. And so I
10 question how serious of a problem that is, and if methionine is
11 overfed, I do not believe there are any adverse health effects
12 for the birds, if that somehow were what was going on.

13 BOARD MEMBER JOHNSON: Okay. Thank you. And then
14 the second question is why not go the Canada route? They have
15 a built-in preference for natural sources, and then this
16 unlimited allowance if necessary. That has a lot of appeal to
17 me. Why not do that here?

18 SECRETARY LEWIS: Also a great question, and that
19 approach also appeals a lot to me. My view on that was having
20 a discussion about a stepwise approach that provides preference
21 to a non-synthetic over a synthetic within a categorical
22 listing at the National List was too big of a topic to address
23 within the context of one specific substance.

24 I think that's the direction the Board should go and
25 work on it. I would love to see a petition for rulemaking from

1 the community to approach that for future boards to take that
2 on. I think it was just too much to try to tackle within the
3 sunset timeline. But I think that a stepwise approach that
4 prefers a natural alternative is a good way to go, partly
5 because it honors previous sentiments from the Board -- which
6 is to prefer a natural alternative to synthetic methionine --
7 while also recognizing that the most paramount issue is
8 ensuring birds continue to be fed adequate rations for animal
9 welfare concerns.

10 BOARD MEMBER JOHNSON: So to paraphrase back what I
11 heard, deal with it at sort of a list level rather than an
12 individual listing level, correct?

13 SECRETARY LEWIS: Exactly.

14 BOARD MEMBER CALDWELL: Okay. Thanks.

15 Nate Powell-Palm?

16 BOARD MEMBER POWELL-PALM: If I may, Allison, jump on
17 your earlier question about sort of who is the guardian of not
18 overfeeding methionine, and it is every single one of my gosh
19 darn customers who is saying where can I cut expense out of the
20 ration? They want it for less.

21 And so the idea of me as a feed manufacturer
22 basically padding the feed with more expensive DL-methionine, I
23 have not seen an opportunity because I'm going to be disclosing
24 every single one of those ingredients, and having customers put
25 pressure on how do we get the cost down, in a commercial sense.

1 BOARD MEMBER CALDWELL: Yeah, Allison?

2 BOARD MEMBER JOHNSON: I think that, well, this is
3 bigger than here, so maybe an agree to disagree moment. But my
4 sense is that for a lot of inputs, producers are price takers,
5 not setters. So I think we do need to be very careful about
6 the role that the input industry plays in shaping what's
7 available to producers, and producers -- especially on the
8 smaller end of the spectrum -- have a lot less leverage than
9 the companies that are providing those ingredients.

10 BOARD MEMBER POWELL-PALM: I think elevating that
11 point about competition, there is not enough feed manufacturing
12 going on in America. So I couldn't agree with that more.

13 BOARD MEMBER CALDWELL: Okay. Mindee?

14 BOARD MEMBER JEFFERY: Thank you. Can you unpack the
15 regulatory pickle for the soldier flies?

16 SECRETARY LEWIS: Sure.

17 BOARD MEMBER JEFFERY: I have another comment
18 afterwards for the Chair.

19 SECRETARY LEWIS: I sort of relish in this mixture of
20 metaphors. Thanks, Brian.

21 So the organic requirements, the organic regulations
22 specify that livestock be fed a ration of agricultural products
23 that are 100 percent organically produced. There's allowances
24 for non-synthetic ingredients, and we see that -- that are not
25 certified organic -- we see an example of those are fish, fish

1 meal, and yeast or microorganisms type, you know, brewer's
2 yeast, those sorts of things.

3 My understanding is that the way insects are reviewed
4 or considered is that they are agricultural products and
5 therefore must be certified organic, but insect producers
6 cannot obtain organic certification because the livestock
7 standards are not designed for insect production. So insect
8 producers must go through the certification gate to get
9 included in an organic livestock ration, but that certification
10 gate is closed to them. Did that help?

11 BOARD MEMBER JEFFERY: It helps, but so I just feel
12 the pain of where we were on this subject and that producers
13 have done a lot of work to develop natural alternatives. And I
14 think I'm very protective of our process, and I'm very
15 protective of helping bring everyone with us because that's how
16 we succeed at rulemaking.

17 And I think also because I feel like this work
18 agenda, the standing annotation change -- like thank you so
19 much, Kyla, for the work that you've done to help us figure out
20 how to deal with the quagmire of sunsets that need annotation
21 changes, because it's tough, and your life's work has lended
22 you the expertise such that you could step us through this
23 really hard challenge of process. So thank you.

24 And this is our first time of doing it, and it looks
25 to me like a highly-functional privilege and a big act of trust

1 to this board from the Program to be able to move through these
2 annotation changes. And so in that light, I just want us to be
3 really careful about how we go about really bringing everyone
4 with us, and this one is a little late in the process, and I
5 think the stakeholder community might need some time to chew on
6 it, and we have your expertise moving forward as the lead able
7 to work through this with us.

8 And so I just feel cautious in that we have a big
9 community of people dealing with a lot of different kinds of
10 issues, and these folks seem like they've worked really hard on
11 developing natural alternatives, but it looks like the
12 regulatory pickle is a long process. So what -- in the grand
13 scheme of your expertise of looking at how we go about moving
14 organic -- that regulatory pickle looks like two years, three
15 years, insurmountable?

16 SECRETARY LEWIS: Also a great question, and no
17 regulatory crystal ball over here, but I think this is an issue
18 for the insect industry to solve with us as the Board and the
19 Program. I think then there's a whole phase of adoption by
20 producers who haven't had the opportunity to see how insects
21 work in their rations, whether their customers want that.

22 And it's at that point that I think we take another
23 look at whether methionine should be listed at all, whether
24 it's a possible replacement, whether we include the
25 conversation around natural preferences, those sorts of things.

1 I think this is, again, an opportunity to provide some
2 regulatory relief to producers and certifiers who are working
3 really hard to ensure the adherence to the organic regulations,
4 and I do not believe it takes too much of the pressure off of
5 finding a natural alternative. I think that's what our
6 industry drives towards.

7 I don't think the burden of that should be borne by
8 the birds or the producers. So for me, that's, again, back to
9 the personal piece that we need to find ways to pressure the
10 industry to do better, but not at the expense of producers and
11 their livestock.

12 BOARD MEMBER JEFFERY: Thank you. I appreciate your
13 depth of understanding, and you've always been really helpful
14 to me explaining the weeds. I feel like I have a really strong
15 impetus to send it back to subcommittee but I think, given the
16 conversation, I'm not sure it would be materially different in
17 six months and we wouldn't be able to provide solution in some
18 ways. So I'm honestly still really conflicted on it in that
19 way, but thank you.

20 BOARD MEMBER CALDWELL: Oh, sorry. Kim?

21 BOARD MEMBER HUSEMAN: All right. Nate, I really
22 appreciate your work on this. I am going to formally state
23 that I am not a PhD nutritionist, so let me start with that.
24 But in ruminants, monogastric, two-legged, four-legged, I've
25 spent a significant amount of time with PhD nutritionists on

1 how to build balanced diets. And the Programs, one being
2 Concept 5 -- there's multiple -- that set the stage that
3 provide all of this information, and it's in a chart format,
4 and you pick an ingredient, you pick a limitation, and you pick
5 a price, and you put in all of the things that are available,
6 and it will compute what the desired formula should look like.
7 And then if you're an organic nutritionist, you take that and
8 you tweak it from what is ideal, according to this program, to
9 what you're allowed.

10 So I take that thought process, and I take myself
11 walking down the aisles at Tractor Supply, my feed mill, my
12 local -- where I buy my little chickens and go to my Z&W Mill
13 in Torrington, Wyoming, and I ask for the bagged feed. And I'm
14 a consumer who has a child who -- all right, but this is a
15 little bit theoretical, but this is happening, it's not my
16 daughter, per se -- but I want to feed my animal a soy-free
17 vegetarian diet, and I think about amino acid complexities.

18 It's somewhat in the lines of having tools in the
19 toolbox, but there's more and more diets, especially in the
20 poultry space, that are asking for soy-free and also need to be
21 able to satisfy the animal welfare of the chicken. So I'm just
22 curious, have you heard from any of the community on soy-free
23 diets and how DL-methionine can provide balance to those
24 rations?

25 SECRETARY LEWIS: I think I'll answer this just from

1 personal experience as a poultry producer that we have heard
2 customers -- we have gotten -- I wouldn't say it's phone
3 ringing off the hook - but, you know, we have 500 birds on an
4 annual rotating flock, and so we provide a couple hundred dozen
5 eggs per week to our local food co-op.

6 And my phone number is on our egg carton, and my
7 email is on our egg carton. We have gotten questions about our
8 -- we get questions about our production regularly. Numerous
9 people have asked if we feed corn and soy. Both corn and soy
10 are allergen concerns among consumers, and there are consumers
11 seeking products -- poultry products -- that are fed corn and
12 soy-free diets. I have never -- by the way -- gotten anyone to
13 ask me whether or not there's DL-methionine added to the feed
14 or not. That's sort of beside the point.

15 But from my understanding, if you do go there, it is
16 possible to feed and make a balanced ration without soy, but
17 with the inclusion rates that we have now, my understanding is
18 it is impossible to do that without the addition of fish meal.
19 We live in a region where salmon and orca health are paramount
20 in many of these consumer minds, and so fish meal is also an
21 ingredient that is not attractive to consumers.

22 So I think we are constrained by the needs of the
23 birds and the nutrient requirements of the feedstuffs that
24 we're using, but ultimately it's about flexibility so that we
25 can meet those consumer demands. And with the limitations that

1 we have now on methionine, that protein needs to be made up
2 somewhere. If you don't have soy on the list of options, you
3 need to find it somewhere else, and fish is where we tend to
4 look.

5 BOARD MEMBER HUSEMAN: Thank you, and I'm just going
6 to put that plug in to say where my area of expertise lies in
7 feeding animals is on the other side of the country, and there
8 are a lot of bagged feeds and a lot of demand for that soy-free
9 poultry diet, and I happen to know of a canola and sunflower
10 producer that can provide those ingredients, and this can help
11 to provide a balanced diet for both bagged feed and bulk
12 feeding operations.

13 BOARD MEMBER CALDWELL: Nate Powell-Palm.

14 BOARD MEMBER POWELL-PALM: The idea of feeding those
15 baby orcas to the chickens, I tell 'ya.

16 SECRETARY LEWIS: It's the fish meal. Don't mince my
17 words.

18 BOARD MEMBER POWELL-PALM: The soy-free conversation,
19 I think as a producer of chicken feed I really appreciate that
20 all of my lines have to be soy-free by demand from my
21 customers. But I think it's also a really interesting question
22 kind of piggybacking on Allison's observation about competition
23 in the feed space, where I am in Montana, I'm at a disadvantage
24 if I need to feed soy because we do not grow soy, and so my
25 competition, who are closer to soy-growing areas, are just

1 going to have an advantage.

2 And so as we think about imagining a world with
3 mineral infrastructure distributed really evenly over the whole
4 country, I think this in a way acts as a catalyst to try to
5 allow folks like the commenter we heard who wants a yellow pea
6 market but can't find one, all of the crops I grow, all of the
7 customers I have, who just aren't well-positioned to use soy.
8 Even if we want it or don't, we're in a part of the country
9 that can't really grow it. And so this, I think, is going to
10 possibly help realize more localized infrastructure and feed
11 availability.

12 BOARD MEMBER CALDWELL: Okay. Any more questions?

13 Okay. Oh, Mindee, sorry.

14 BOARD MEMBER JEFFERY: Process-wise, for the work
15 agenda on annotation changes, we're going to hear about that in
16 PDS, right? Like we're going to -- in that update next that's
17 going to come -- how we're going to move forward with being
18 better at externalizing how we're going about annotation
19 changes?

20 SECRETARY LEWIS: I was going to bring it up as a
21 topic that PDS is going to work on, but I think having a
22 conversation about it now would be great if you wanted to.

23 BOARD MEMBER JEFFERY: No, I mean in that like that
24 the weight of our responsibility to the stakeholders weighing
25 against the weight of our responsibility to animal welfare and

1 the process of this, and making sure we're delivering great
2 things at rulemaking, that bringing the community with us. I
3 feel like I'm willing to concede that we're allowed to learn
4 from our mistakes and get better at the process and get better
5 at externalizing things, and this is a really painful one for
6 me. And I came in today really convinced I was ready to go
7 back to subcommittee, but I feel like pretty convinced that we
8 might not be able to solve the insect problem right now, and
9 that the annotation's not functional for producers.

10 And so I'm just reiterating that we have a process
11 problem and that that's okay because, in particular, I'm not
12 sure this -- I don't think we're going to get somewhere
13 different if we do this for six more months. So I just wanted
14 to sort of keep looking at us being humans, doing our best, and
15 doing difficult process changes, and just thank you.

16 BOARD MEMBER CALDWELL: Mindee, I always appreciate
17 you keeping us with our vision going in the right direction.

18 All right. Any more questions?

19 Okay. I don't see any.

20 CHAIR SMITH: Okay. Let's vote. So this proposal
21 before us to change the annotation by removing the striked-out
22 parts, as shown on the screen here, to methionine at 205.603(d)
23 as a feed additive comes motioned and then seconded from the
24 subcommittee. It was motioned by Nate and seconded by Kim.

25 And the vote starts with Kim?

1 BOARD MEMBER HUSEMAN: Yes.

2 BOARD MEMBER TURNER: Yes.

3 CHAIR SMITH: Logan?

4 BOARD MEMBER PETREY: Yes.

5 BOARD MEMBER D'AMORE: Yes.

6 BOARD MEMBER DIMITRI: Yes.

7 BOARD MEMBER NANDWANI: Yes.

8 BOARD MEMBER CALDWELL: Yes.

9 BOARD MEMBER JOHNSON: Yes.

10 SECRETARY LEWIS: Yes.

11 VICE CHAIR BRUCH: Yes.

12 BOARD MEMBER QUARCOO: Yes.

13 BOARD MEMBER JEFFERY: Yes.

14 BOARD MEMBER POWELL-PALM: Yes.

15 CHAIR SMITH: Chair votes yes.

16 SECRETARY LEWIS: 14 yes, 1 absent. The motion
17 carries.

18 BOARD MEMBER CALDWELL: Okay. Nate Lewis, another
19 annotation, for iodine.

20 SECRETARY LEWIS: Okay. Is it just the next slides?

21 Ah, look at that. Okay. So I think hopefully this one's a
22 little less moving to folks, but we'll see.

23 So this is an annotation change related to iodine.

24 So, as a reminder, iodine is used as a teat dip and a sanitizer
25 in livestock production. The topic about this is related to

1 alkylphenol ethoxylates -- I'm hoping that everyone can leave
2 here pronouncing that word -- and one of the types of
3 alkylphenol ethoxylates, nonylphenol ethoxylates, NPEs.

4 So as I mentioned, iodine teat dips remain necessary
5 for organic livestock production. There has been an ongoing
6 concern about the fate of the surfactants used in these teat
7 dips in the environment, particularly nonylphenol ethoxylates.
8 NPEs are being phased out but are still used in some
9 formulations.

10 I want to make a note about NPEs versus APEs. So
11 alkylphenol ethoxylates are the broader class of substances of
12 which nonylphenol ethoxylates are one. Another one is
13 octylphenol ethoxylates. So 90 percent of APEs are NPEs, but
14 there is a remaining 10 percent of those substances that are
15 octylphenol ethoxylates. Both types of substances are used in
16 teat dips as a surfactant. A quick Google patent search shows
17 numerous teat dip products that list nonylphenol ethoxylates as
18 a potential ingredient, and octylphenol ethoxylates as a
19 potential ingredient.

20 This proposal is to prohibit both types of substances
21 by prohibiting the entire class of substances, APEs. The logic
22 behind this was that, if we only prohibit NPEs, these patents
23 that have both ingredients as options could easily swap them
24 out, and if we only prohibited NPEs they could swap it out for
25 an octylphenol ethoxylates and still meet the requirements of

1 the organic regulation. Both types of substances are similarly
2 toxic to aquatic organisms and persistent in the environment,
3 and that's the rationale for prohibiting both types of
4 substances.

5 We did get pretty much overwhelming unanimous support
6 to prohibit NPEs specifically. There are some commenters that
7 wanted to prohibit APEs generally. There were concerns about
8 the material review burden of prohibiting the broader class of
9 substances, APEs, rather than simply focusing the prohibition
10 on NPEs.

11 And I want to acknowledge that that is something that
12 will likely need to be wrestled with if we do pass this motion
13 and it goes through rulemaking, partly because I want to note
14 that many -- I put the word "most" in here, so that might not
15 be totally true -- but I believe most teat dips are reviewed by
16 certifiers within the context of a system plan rather than by
17 MROs.

18 So these are certifiers that are out doing the
19 inspections. They are reviewing individual producer systems
20 plans who are buying teat dips, and so these are not material
21 review organizations that are doing it. I don't believe
22 there's very many teat dips listed on OMRI's list, for example.

23 And I also want to note that APEs in general are
24 being phased out all across the board as surfactants. Everyone
25 sort of agrees that they are toxic, they are persistent, they

1 are no longer necessary, there are suitable replacements, and
2 so EPA and FDA and the industry are moving towards that
3 direction anyway.

4 So we are ahead of the curve, but I also want to
5 acknowledge that when we direct the Program to do work, they
6 don't have an infinite well of resources. So we are asking the
7 Program to do work and that is, you know, drawing from their
8 well of rulemaking abilities. So we always need to weigh that
9 as we evaluate it. If these substances are going to phase out
10 anyway, do we gain much by prohibiting them a few years before
11 they're not used in the industry altogether? My opinion is
12 yes, that we should still phase them out, but I want to
13 acknowledge that that is an element of this decision that we're
14 faced with.

15 So here's the proposal, would be to annotate iodine
16 at 603(a)16 and 603(b)4 to read iodine must be produced without
17 the use of alkylphenol ethoxylates.

18 With that, I'll be happy to answer any questions.

19 BOARD MEMBER CALDWELL: Kyla?

20 CHAIR SMITH: Thanks, Nate. I just wanted to also
21 point out one of the comments from a certifier explaining the
22 relationship of excipients through complexing agents in iodine.
23 And so there is the potential that APes or NPes are used as a
24 complexing agent that, you know, are allowed currently like
25 through the excipient listing.

1 So excipients, I believe, are being reviewed next
2 year, so just want to flag that, similar to the inerts, one of
3 the options we have that specifically called out.

4 So perhaps that's something to consider with the
5 excipient's listing, and also perhaps we could just, in the
6 cover sheet, if this does pass in the cover sheet, maybe we
7 could just make it clear that the intent is to prohibit all
8 uses of APEs and NPEs even if used as an excipient, and that
9 can get fleshed out in rulemaking. Thanks.

10 BOARD MEMBER CALDWELL: All right. Other --

11 Oh, Allison, go ahead.

12 BOARD MEMBER JOHNSON: Thank you for this. This is a
13 new one to me. There were a number of commenters who asked us
14 to use the language without the use of alkylphenols or
15 alkylphenol ethoxylates. Can you speak to the ethoxylate part
16 and why we wouldn't want to broaden this to cover alkylphenols
17 generally as well? There's not a lot of detail on the
18 chemistry in the proposal, so I'm a little over my head.

19 SECRETARY LEWIS: Yeah, I think I'm a little over my
20 head on that one too. So I think alkylphenols are a broader
21 class, and perhaps we should include them. I mean --

22 BOARD MEMBER JOHNSON: Yeah, my 20-year-old OChem
23 would tell me that alkylphenols is the broader category that
24 would probably include the ethoxylates, but I don't know if
25 it's the ethoxylate part that we're worried about or the

1 broader class.

2 SECRETARY LEWIS: I think it's a very fair question.
3 And I think, in light of the point you're making about
4 excipients, it might be worthwhile to bring it back to
5 subcommittee to combine with the excipients sunset review.

6 CHAIR SMITH: I'm fine with that approach. Yeah, if
7 we feel like we need more time to dig into that piece as well
8 as to align it, and then if we don't get into a further
9 quagmire it might be --

10 SECRETARY LEWIS: Yeah, both your questions and
11 comments really resonate with me that combining it with the
12 review of excipients makes a lot of sense, and sort of getting
13 to the heart of the exact type of substances that we should be
14 prohibiting. Those both resonate with me, and so I think with
15 that, I'll make a motion to send this proposal back to
16 subcommittee.

17 VICE CHAIR BRUCH: Second.

18 CHAIR SMITH: Twist and turn. Look at this, guys.
19 Brian was like, whoa.

20 Okay. there is a motion and a second to send back to
21 subcommittee. Any further discussion on that?

22 I think the vote starts with Wood.

23 BOARD MEMBER TURNER: Yes.

24 CHAIR SMITH: Logan?
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BOARD MEMBER TURNER: Yes.

CHAIR SMITH: Logan?

BOARD MEMBER PETREY: Yes.

BOARD MEMBER D'AMORE: Yes.

BOARD MEMBER DIMITRI: Yes.

BOARD MEMBER NANDWANI: Yes.

BOARD MEMBER CALDWELL: Yes.

BOARD MEMBER JOHNSON: Yes.

SECRETARY LEWIS: Yes.

VICE CHAIR BRUCH: Yes.

BOARD MEMBER QUARCOO: Yes.

BOARD MEMBER JEFFERY: Yes.

BOARD MEMBER POWELL-PALM: Yes.

BOARD MEMBER HUSEMAN: Yes.

CHAIR SMITH: Chair votes yes.

SECRETARY LEWIS: 14 yes, 0 no, 1 absent. The motion carries to send this proposal back to subcommittee.

BOARD MEMBER CALDWELL: I think that that is our work for the Livestock Subcommittee. And thank you, everybody here, including our audience for making it through this. Good work.

BOARD MEMBER HUSEMAN: Yes, thank you, Brian.

(Applause.)

BOARD MEMBER HUSEMAN: Nice job.

1 CHAIR SMITH: I just, yeah, wanted to say thanks,
2 Brian, for your leadership. Again -- just to echo what Nate
3 said earlier -- like, oh, livestock is easy in this semester.
4 We had a lot of juicy ones. So we kept it fun and
5 entertaining, and you navigated all of the conversations with
6 grace and leadership. So thank you. And to the rest of the
7 subcommittee, small but mighty crew on livestock.

8 So we are going to take a 10-minute break because we
9 are a little bit behind. So we'll come back at 11:05.

10 (Off the record from 10:55 a.m. to 11:08 a.m.)

11 CHAIR SMITH: Okay. I just wanted to state, because
12 I forgot to say at the beginning of the meeting, that the Board
13 was provided conflict of interest declarations before the start
14 of the meeting, and no conflicts of interest from the Board
15 were declared so there are no recusals. I think I forgot that
16 at the spring meeting too, so maybe I'll get it right one of
17 these days.

18 I'm going to turn it over to Nate for a short update
19 from the Policy Development Subcommittee.

20 SECRETARY LEWIS: Thanks, Kyla, and I will keep this
21 brief. Policy Development Subcommittee does a lot of work, and
22 some of that is internal facing. So I just want to acknowledge
23 that.

24 For the previous semester and the upcoming semester,
25 what we are working on are related to diversity and equity, and

1 we're seeking ways to engage with USDA's Equity Commission,
2 elevate the work that they've done, and make some
3 recommendations related to implementing that across the board
4 through our training and perhaps through our recommendations.

5 We have some work onboarding the next class of board
6 members, of which there will be five, and the following year
7 there will be five more. So we want to make sure that that
8 onboarding is as seamless and supportive as possible, and that
9 will include developing an onboarding plan and coordination
10 with the Program on those training opportunities.

11 We're going to continue working with our food
12 technologists and developing their work plan and providing
13 feedback on work progress so far. That will include an
14 opportunity for outgoing board members to participate in kind
15 of an open PDS meeting related to technical support for the
16 Board and setting up future boards for success.

17 I think this meeting showed that we need a little
18 more clarity in our policies and procedures manual related to
19 technical reviews, and so I hope to add that to our PDS work
20 agenda so that there's clarity around when an external
21 technical review is ordered, when an internal one is conducted,
22 and how the results of those processes are reflected to the
23 stakeholder community.

24 And then, lastly, I was really taken by a comment we
25 heard yesterday about increasing accessibility to the meeting

1 materials themselves so that someone doesn't need to spend
2 seven-and-a-half years or whatever it was reading the packet to
3 get to the thing that actually is relevant to their operation.
4 And so thinking through that and what sorts of additional
5 elements, like an executive summary, could be included so that
6 the work that we do can continue to be granular and specific
7 but also understanding the relevancy to a particular operation
8 or stakeholder group can be seen quickly and easily. Let me
9 see if I have -- I think that is all I had in my notes.

10 I'll turn it back to you, Kyla.

11 CHAIR SMITH: Thanks, Nate.

12 We are going to now move to the Crop Subcommittee
13 which Logan will be facilitating and with the help of her
14 virtual guardian, Nate Lewis. He's dubbed himself as that to
15 help Logan stay connected to us all here in the room.

16 SECRETARY LEWIS: Nonprofit jargon for you, so --

17 CHAIR SMITH: Okay. So, Logan, I'll turn it over to
18 you.

19 BOARD MEMBER PETREY: Thank you, Nate. Thank you,
20 Kyla.

21 So I did send some slides over to Andrea. I don't
22 know if those could get on the screen. Cool. All right. Next
23 slide, please. Okay.

24 So everybody take a deep breath in. Next, please.
25 Exhale. All right. We needed that.

1 Next slide. Carbon dioxide. Thank you.

2 Okay. So 205.601(j). We all know it, not only
3 because we're full of it, but because we have wrestled with
4 this material for years. Each semester the subcommittee,
5 Board, stakeholders, continue to do discussions of climate
6 change essentiality and the information in the petition. Next
7 slide, please.

8 So each opposing commenter was concerned of increased
9 carbon dioxide production and its negatively affecting the
10 climate. This concern was shared by the Board and the Crop
11 Subcommittee and was reflected in our discussions. In
12 response, the Crop Subcommittee proposed the annotation to be
13 sourced as a byproduct to prevent new production of carbon
14 dioxide for this listing's use.

15 Non-synthetic sources -- I do want to highlight --
16 that are tapping into CO2 wells, and I would argue that this
17 would increase the CO2 emissions instead of using byproducts.
18 The impacts of synthetic carbon dioxide -- this is found in the
19 TR, and I just want to go through kind of -- it's all of an
20 assumption, that's all that the TR could do.

21 We don't even have the number of greenhouses that are
22 in organic production. So this is totaling all greenhouses
23 which we know that the conventional is an overwhelming
24 majority. But if all of the greenhouses were to produce at
25 1300 parts per million, it estimates that it would be 0.008

1 percent of the natural gas used in electricity generated in the
2 U.S. per day, so just to give you an impact of what we're
3 looking at here for this material. Next slide, please.

4 All right. Another thing that came up a lot, and I
5 did use "essential" in the write-up and the proposal as well,
6 but essentiality. So is it essentiality or necessity? I
7 started diving into the regulations and was looking for that,
8 and I saw that, yes, essentiality is for handling.

9 So I kind of phoned some friends this morning. I did
10 get some help, say go to OFPA, of course. So we go to our
11 roots, we go to OFPA. Didn't find essentiality, I found
12 necessity, it's necessary for the production or the handling.
13 So what is the difference? Doesn't seem we use those
14 interchangeably sometimes. So what is the difference? Next
15 slide, please.

16 I didn't know how to reference this, so I just put
17 Microsoft Bing in the corner, and that's where I got it from.
18 So we have these two definitions, and just going over this
19 briefly, it says necessity is needed and not indispensable,
20 essential, absolutely required. Necessity is important, can be
21 omitted, and essential, extremely important, cannot be omitted.

22 Next slide, please. So when I'm going through --
23 Mindee, I'm actually going to steal some of the words that you
24 used for meloxicam except I'll replace essential with necessity
25 -- you asked three questions. Does this material have human

1 health concerns? No, we just breathe it out of our body. So
2 does the listing of this material have environmental concerns?
3 I argued no, this listing does not. And is this material
4 necessary? I say yes. Next slide, please.

5 I'm not alone in thinking this way. The following
6 standards, Canadian, Codex, EU, and IFOAM, also allow synthetic
7 carbon dioxide as a plant amendment protectant and growth
8 regulator. If you look into the details of IFOAM, it says as a
9 crop protectant growth regulator in organic crop production,
10 CO2 is allowed with the following restrictions, shall not be
11 the result of burning fuel solely to produce carbon dioxide,
12 allowed only as a byproduct of other processes.

13 The petitioner was not thorough for the use as a
14 plant or soil amendment, but we have a new and a thorough
15 technical review, and this material is trusted all over the
16 world. Next slide, please.

17 That is it. So with that presentation over, I'd like
18 to open it up for discussion.

19 CHAIR SMITH: Nate?

20 BOARD MEMBER POWELL-PALM: I'm having a really good
21 time at this meeting, but it is really a bummer you're not
22 here, Logan.

23 BOARD MEMBER PETREY: Thank you.

24 BOARD MEMBER POWELL-PALM: And I just wanted to
25 acknowledge, one, how grateful I am to serve with you, and two,

1 the duration with which you have stewarded this material. It
2 is incredible, the time and attention you've given it. So I
3 really want to thank you for that to start.

4 CHAIR SMITH: Nate Lewis?

5 SECRETARY LEWIS: I sort of intimated at this comment
6 when we were going over oxalic acid for bees and apiculture,
7 but I wanted to share with the Board a little bit of evolution
8 in my thinking about this topic.

9 And I think when I first came on the Board and we
10 were talking about it, I was a little bit adverse to adding a
11 substance to the list that's primarily used in production
12 systems for which we don't have specific standards. And so I
13 know the Board has been eager and the community has been eager
14 to develop container and greenhouse standards, et cetera, and
15 so I kind of thought, well, we don't have those standards,
16 should we be really voting on this?

17 And then I wanted to just share the evolution of my
18 thinking here, though, which is that I looked at my own farm,
19 and my own farm has a greenhouse, and the crop standards as we
20 have them are applied to my farm. And I looked at many small
21 farmers who are working with NRCS in getting greenhouses, and
22 many of them have -- certifiers have applied the crop standards
23 to those types of greenhouse production systems.

24 So while we continue to not have very specific
25 standards related to greenhouse containers, my thinking on the

1 topic is that this is distinct from the materials used in
2 aquaculture, for example, which should be tabled until we have
3 that type of production standards, and that this should be
4 evaluated within the context of the current standards as
5 they're applied, which include greenhouses.

6 And so it was that evolution of thinking related to
7 this topic that moved me from let's sort of just let this one
8 die, to actually let's put this tool in the toolbox for
9 producers who are growing crops under protection and who may
10 need to have this for the necessity of their production system.

11 CHAIR SMITH: I'm going to go to Jerry first, then
12 back to Nate.

13 BOARD MEMBER D'AMORE: I came into this room thinking
14 that if I had to make any comment at all it would already
15 indicate a direction that I didn't want to see it go in. So
16 you've provided me with a real opportunity to say, thank you, I
17 agree with you entirely.

18 CHAIR SMITH: Nate Powell-Palm?

19 BOARD MEMBER POWELL-PALM: I'm just looking to pile
20 on Nate Lewis and say that I've done, oh, 3000-plus
21 inspections, and I've never come across a vegetable operation
22 that did not have a greenhouse. So just to really dial in that
23 we are talking about everybody is going to do some greenhouse
24 work here, and we're talking about the smallest -- the folks
25 that we really want to keep the heart of organic -- are folks

1 that would benefit from this tool.

2 CHAIR SMITH: Amy?

3 VICE CHAIR BRUCH: Logan, thanks for your tenacity
4 with this topic. I wanted to see if you could highlight some
5 of the outreach you did do on a producer, and to get more
6 information.

7 BOARD MEMBER PETREY: Sure. So I did reach out to --
8 most of my reaching out was here in the Southeast, and so then
9 I kind of found out that we're not using a lot of that because
10 of the climate's difference. Also, I was looking in the wrong
11 area. I was looking in the nursery side, so I saw transplants
12 and realized that this was more in production. And I know
13 Jerry can talk on that more, but this was more for whole crop
14 production.

15 And so I relied a lot on Jerry's experience there,
16 and we did reach out to a certifier who does have operations in
17 this area that uses the non-synthetic carbon dioxide, and
18 struggles at times to get the material, and has to source it
19 from far areas, and so is not always able to have a consistent
20 supply.

21 CHAIR SMITH: Allison?

22 BOARD MEMBER JOHNSON: From both of the Nates, you
23 mentioned greenhouses. Have you heard from producers wishing
24 that they had this tool in as many visits to greenhouses?

25 CHAIR SMITH: Go ahead, Nate.

1 BOARD MEMBER POWELL-PALM: Yes. But an interesting
2 thing that Logan just brought up that I think sort of would
3 illustrate my experience a little bit better is climate. And
4 so when we're venting greenhouses. The North is going to be at
5 a disadvantage to the South since we have to -- if we're trying
6 to have elevated CO2 levels in a greenhouse space -- when you
7 have to vent, it's going to be very cold, and so it's going to
8 be more expensive and you're going to lose that stable -- that
9 control.

10 So I feel like I've heard a lot of commenters talk
11 about a Southward sort of favoritism that we're saying that
12 everything's going to Mexico, all of our opportunities in the
13 North are getting lost. And I think this is an interesting
14 observation to say how can we help give producers who are close
15 to their communities not an equal playing field but one more
16 tool in the toolbox to help them try to keep up.

17 Jerry, would you like to add anything more? I feel
18 like your container growing experience is really valuable here.
19 And I'm sorry, let me clarify that. We're not talking about
20 containers, but your controlled environment agriculture is
21 really --

22 BOARD MEMBER D'AMORE: Yeah. Well, first of all, I'd
23 like to add on to the comment. In the last two days I have
24 received over 15 emails from overseas from greenhouse producers
25 asking what the blank are we doing? And just to most of the

1 world, it's just a total SOP.

2 And you're absolutely right that there will be an
3 advantage North to South, favoring the South. And that when
4 the -- if you would -- without this tool, as you just said, you
5 would have to exhaust the heat to bring in the ambient, to
6 bring in the outside, and the economic costs of that is
7 staggering. Every time you have to bring the greenhouse up
8 10 degrees, you're doubling your fuel bill. That's a pretty
9 easy piece of math.

10 Yeah, and my experience, Nate, is one where I didn't
11 have to worry about all of this because it was prior to any of
12 what we're talking about in OFPA and in the seal, but it was
13 just a no brainer in terms of production. I've given you those
14 numbers before, and I am not unhappy to give them to you again.
15 CO2 is an addition to our total crop on an annual basis that
16 approaches 20 percent increase in production. It's phenomenal.

17 So yeah, again, I'm going to hold my peace because I
18 don't want to go any further than right or left of that other
19 than to say that CO2 is -- in the world that I know -- is used.
20 I thought the annotation that came in on top of it was okay,
21 why not? And I think we're in a good spot to proceed.

22 BOARD MEMBER PETREY: Jerry, and a question just on
23 that. I mean, you did say that if we do vent, or if people in
24 the cooler areas do vent, it's going to double the fuel to get
25 temperatures back up to where it's needed. So it seems like

1 that if you are venting to get carbon dioxide that's in the
2 atmosphere back into the greenhouse to get those levels that
3 you want, you are producing more carbon dioxide because you are
4 going to have to raise the temperature back up, so that is not
5 reducing the overall CO2 emissions.

6 BOARD MEMBER D'AMORE: That's the irony of the entire
7 discussion right there, yes.

8 BOARD MEMBER PETREY: Yeah. Thank you.

9 BOARD MEMBER D'AMORE: Yep.

10 CHAIR SMITH: Nate?

11 BOARD MEMBER POWELL-PALM: I want to practice this
12 overexplaining what we're talking about here and make sure that
13 we are externalizing everything so that there's no jargon that
14 has folks in the dark.

15 Jerry, could you talk about just briefly what we mean
16 when we're saying venting? Or rather, could I explain it and
17 you correct me? Thank you.

18 So when plants are really cranking in that greenhouse
19 they're going to suck up a lot of CO2. We either open the
20 doors to let more CO2 in, thus dropping the temperature, or we
21 pipe it in, protecting the temperature.

22 And so it's that opportunity in the South -- as you
23 said, it will favor the South -- where opening the vents to let
24 more CO2 in doesn't matter because it's warm out. It's in
25 Vermont, in Wisconsin, in Montana, that we're going to be

1 disadvantaged because if we can't pipe it in, we're just going
2 to be spending a lot of money on fuel.

3 BOARD MEMBER D'AMORE: I'd like to add to that
4 because I don't want to go overboard with the North-South
5 piece. I grew crops in Florida for six years of my life, and
6 I've been using greenhouse production in Florida, and it gets
7 cold there. It's just a question of how much and how long.
8 More disadvantaged than less disadvantaged, but both
9 disadvantaged.

10 CHAIR SMITH: Mindee?

11 BOARD MEMBER JEFFERY: I remain unconvinced of the
12 necessity or essentiality. I'm compelled by the public
13 comments about the early stages of the petition, and maybe we
14 shouldn't have been considering this, and the request from the
15 manufacturer, and maybe not supported by producers.

16 And I could have seen a path by which sending this
17 back to the subcommittee could be functional if we were going
18 to work on broader practice standards, but because I worry that
19 if we say no now, and then that comes back, and then this
20 should be in consideration, I think that's a really needy
21 concern. So I'm not going to personally motion it back to
22 subcommittee, but I'm not convinced.

23 CHAIR SMITH: Allison?

24 Sorry, Franklin?

25 BOARD MEMBER QUARCOO: Yes, I just wanted to say that

1 carbon dioxide, even though it's something that is produced
2 normally in normal processes, so it's everywhere, but it is a
3 greenhouse gas. It is one of the most abundant greenhouse
4 gases.

5 Now, if you have an operation that needs something
6 that we are already producing, and we are climate smart
7 agriculture, we are talking about carbon sequestration, keeping
8 more carbon here, if there is somebody who has a useful thing
9 to do with what we are already producing, that is leading to
10 acidification of the ocean which is one of the sinks, and all
11 of the -- so to me it's a good thing because carbon dioxide, we
12 all know photosynthesis. So if there is a unit that needs
13 carbon dioxide to go in there, and it's already being produced,
14 and we are looking at climate smart carbon sequestration, it's
15 a good thing.

16 My issue -- which I brought up the last time, and
17 which has been addressed -- is that let's not give an incentive
18 to folks to go produce. Maybe it makes more sense to produce
19 than to harvest the carbon dioxide, and then we are not
20 producing more of the greenhouse gas.

21 So if it's already being produced, let's use it for
22 something plants need in an enclosed environment that you don't
23 want to open, but they need carbon dioxide for photosynthesis.
24 So it's a win-win situation, climate smart, you are keeping
25 more carbon here than going into the environment, so I'm

1 comfortable with it.

2 CHAIR SMITH: Allison?

3 BOARD MEMBER JOHNSON: Thank you, Franklin. You kind
4 of got it what I'm turning on over here. I think a lot of the
5 comments voiced concern about this material because of the
6 close connection between climate change and CO2.

7 And I'm curious, Logan, or anyone else, if you can
8 talk a little bit more about what it looks like to source this
9 as a byproduct. There were some comments about pulling it from
10 the atmosphere, pumping it in, which I imagine has some energy
11 intensiveness associated with it. So what does sourcing as a
12 byproduct do for us here, particularly with an eye to the
13 climate issue?

14 BOARD MEMBER PETREY: Sure. Well, the sourcing as a
15 byproduct -- well, a lot of it we're able to assume that the
16 byproduct would be used from what the greenhouse produces
17 because of the heating. And so I think that that would be a
18 lot of it because when it does heat, then they stored the
19 carbon dioxide, and then they're using it during the day --
20 heating at night, using it during the day -- which one of the
21 oral commenters mentioned that process.

22 But as far as sourcing it synthetically, I think the
23 options are a lot more, and so probably closer to the
24 operation. And so you're looking at, as far as a footprint in
25 transportation, what would be higher? You would have the CO2

1 wells, which anybody going into those wells is usually in the
2 oil fields because that's actually where most of that
3 production is already going on is pulling that out and putting
4 it into wells for oil extraction. And so I would -- I don't
5 have -- in the TR, it may have specifics of where we can get
6 the synthetic carbon dioxide and some of the sources, but I
7 know that some of it's actually in the greenhouse, so it's
8 right there.

9 CHAIR SMITH: Nate?

10 BOARD MEMBER POWELL-PALM: I just wanted to say from
11 a very practical point of view, it's mostly that it's from the
12 heater, and the heaters either send it up in the air -- or to
13 Franklin's point -- back to the plants. And so that's just
14 like purely logistics that it's going to be right there, not a
15 small greenhouse in Vermont kegging it in somehow.

16 CHAIR SMITH: I don't see any other hands. I think
17 we are ready for the vote.

18 So carbon dioxide is already listed on the National
19 List and classified as synthetic, do we don't need to do a
20 classification motion. The motion to add carbon dioxide at
21 205.601(j), with the annotation of must be sourced as a by-
22 product, comes to the Board motioned and seconded by the Crop
23 Subcommittee. It was motioned by Logan and seconded by Jerry.
24 I don't remember who's starting the vote. Logan, I think.
25 Wood?

1 BOARD MEMBER POWELL-PALM: Yeah, I think it's Logan.

2 CHAIR SMITH: I think it's Logan.

3 BOARD MEMBER PETREY: Yes.

4 BOARD MEMBER D'AMORE: Yes.

5 BOARD MEMBER DIMITRI: No.

6 BOARD MEMBER NANDWANI: Yes.

7 BOARD MEMBER CALDWELL: Yes.

8 BOARD MEMBER JOHNSON: Yes.

9 SECRETARY LEWIS: Yes.

10 VICE CHAIR BRUCH: Yes.

11 BOARD MEMBER QUARCOO: Yes.

12 BOARD MEMBER JEFFERY: No.

13 BOARD MEMBER POWELL-PALM: Yes.

14 BOARD MEMBER HUSEMAN: Yes.

15 BOARD MEMBER TURNER: No.

16 CHAIR SMITH: Chair votes yes.

17 SECRETARY LEWIS: 11 yes, 3 no, 0 abstentions,

18 0 recusals, 1 absent. The motion carries.

19 CHAIR SMITH: Back to you, Logan.

20 BOARD MEMBER PETREY: Okay. I'm going to party after
21 that one. I can't. I work.

22 No, okay. So going on next, thank you all for all
23 the help. That was fun. That was a marathon. I'm a sprinter,
24 I'm used to sprints.

25 Okay. So next up we have is compost.

1 CHAIR SMITH: Thank you, Logan.

2 BOARD MEMBER PETREY: Yeah.

3 BOARD MEMBER JEFFERY: No, I didn't do a slide show.
4 I need a phone buddy. Will you come sit by me, Nate?

5 Thanks, everyone, for all the good work on this
6 compost work agenda item, and I'm really grateful for the
7 addition of Nate Lewis into the NOSB.

8 Thank you. So I think first we want to look at
9 process progression for this issue. This issue came up for me
10 because Good Earth Natural Foods was kind enough to let me out
11 of the box of everyday retail work and manage their compost
12 program.

13 So food waste goes from Good Earth to the farm, and I
14 spent the last four years learning how to make compost, and I'm
15 really grateful for that opportunity. And in my learning
16 process I realized that, because I took the U.S. Compost
17 Council's Operations Class, that as I was a Board member and I
18 was learning compost, I realized there was some room for
19 improvement on how the adjacent world of compost is looking at
20 modernizing composting and how organic is functioning inside of
21 compost.

22 So I started talking to Nate Powell-Palm who was the
23 Chair at the time, and Amy who was the Crop Subcommittee at the
24 time, and we started talking to the Program about the potential
25 for compost updates. And then subsequently, the BPI submitted

1 a petition to the USDA on this issue directly. And thank you
2 so much, Jenny, for the amazing conversation about how those
3 two processes work so that we can all land in the clarity of
4 where we're headed.

5 And so the NOP gave us the work agenda -- a very
6 broad -- thank you, Standards Division, and NOP -- for the
7 trust of giving us a great work agenda to work through on this.
8 And in the spring of 2024, we did a discussion document to open
9 up, and for me that was really important because we needed to
10 look at the entirety of how regulations work on compost and how
11 they dovetail into organic because you really have to find the
12 path in organic. You have to really look for how do we be
13 functional and practical in our criteria, but we're also
14 relating to adjacent industries, and so how do we go about
15 doing that? How do we deal with adjacent regulations, and what
16 is the FDA doing, and what is the EPA doing? So we did that
17 work a lot in the spring in the discussion document.

18 So here we are, and our process path is very clear in
19 that when we look to work on an issue we sort of have to start
20 with the big picture, and for us the big picture is the
21 definition and the practice standard. So inside of who we are
22 as the NOSB and how we go about doing this work, that's what
23 we're doing here now.

24 So we are looking at the definition and the practice
25 standard because that's the umbrella, and we know that we are

1 always committed to democracy in this process and people having
2 equitable access to understanding our system and entering that
3 into our system, and so this is where we are now is looking at
4 that part of the process.

5 SECRETARY LEWIS: And I'll just add that I will
6 really miss you, Mindee, when you depart the Board, but there's
7 a commitment to continue the work of compost. We're laying the
8 foundation here so that we can continue the conversation
9 related to compostable products.

10 I have a background in composting. I took Washington
11 State's -- Washington Organic Recycling Council's composting
12 course in 2004. I've been composting large animal mortalities,
13 poultry processing offal, food waste, vegetable waste, since
14 then on my farm, and I'm actually working right now with NRCS
15 on a manure storage facility. The concrete is being poured
16 right now which is like super stressful for me, but I am here,
17 nevertheless.

18 And so I personally have a tremendous commitment to
19 compost. I know I'll be repeating myself with saying that
20 compost itself won't save the world, but you can't save the
21 world without compost. So compost is important, it's a
22 foundational element, and we need to get this right. We need
23 to preserve the rulemaking authority of the Board and the FACA
24 process.

25 So what we're doing here is laying the foundation,

1 and what we will be doing moving forward is a good-faith effort
2 to evaluate compostable substances. Two National List
3 criteria, we have ordered a technical review of those
4 substances. I personally think there's a lot of merit to what
5 those substances can bring to the world of food waste, waste
6 reduction goals, and compost, and so I just want to reassure
7 the community that we're laying the foundation for a good-faith
8 evaluation of those substances through our process, which is
9 the FACA route of this conversation.

10 BOARD MEMBER JEFFERY: Okay. So looking at
11 definitions and practice standard. Is there also a slide with
12 the practice standard part of the -- we can toggle through that
13 if we need to. Okay. Great, thanks.

14 So then some part of the public comments noted that
15 maybe we didn't -- in this particular document -- deal at depth
16 with some synthetic substances that might arrive with compost
17 feedstocks. And so noting that we did in the spring discussion
18 talk about UreC and contamination and testing as something that
19 needs to move over to CACS while they work on residue testing,
20 and that we do have a work agenda item on hold for the
21 contamination of crop inputs.

22 And we have, I think, a necessity for adding some
23 things to research priorities because I think the compost
24 industry at large and organic systems need to understand what
25 is the toxicology of compost piles, as it were. Like how do

1 things break down in there? What makes it through? What
2 doesn't make it through? And I don't know that we have a real
3 comprehensive universal clarity on that right now.

4 And so I think it's important for us to move that to
5 the side and proceed with the umbrella so we have a foundation
6 upon which we can build really great partnerships with the
7 composting industry and understand what they know, and then
8 inform what we can do to protect ourselves from those UreC and
9 contamination. And I think there is some work to do around
10 what is UreC and contamination.

11 And so just to provide you with the example, so food
12 waste, green waste, and manure might all have -- they are
13 compost feedstocks -- and they might come with prohibited
14 synthetics, but that is future work, not work now.

15 SECRETARY LEWIS: Yeah, and I'll just add that this
16 discovery phase on that topic, both is what are the fate of
17 these substances but also learning what are already being
18 regulated. So on the West Coast and in some other states
19 nationwide, waste-derived fertilizers, of which compost is one,
20 must be evaluated for heavy metals.

21 So I know this is the case in Washington, Oregon, and
22 California, and I know numerous other states, but I don't
23 really think outside of the Pacific Time Zone so I haven't
24 focused on that. But we need to also discover what standards
25 are composters already meeting just because they're a

1 composter, and how do those current standards align with the
2 principles of organic production?

3 BOARD MEMBER JEFFERY: So then we have public
4 comments so we understand where we are in this umbrella of how
5 we move through this big issue. And there were plenty of
6 comments from folks in lots of different sectors that support
7 the BPI petition, and they expressed that very clearly in the
8 public comments. And they came from composters, the
9 compostable packaging industry, state departments of
10 agriculture, and they are advocating for the USDA to go
11 straight to rulemaking and to make adjustments for definitions.

12 And because we got the great explanation and because
13 this is the way we go about doing our work, I am going to
14 confine myself to representing the comments that were directly
15 pertinent to the definition and the practice standard. So if
16 you, on the Board have questions, or there's a problem
17 somewhere in any of the BPI supportive comments, super happy to
18 address those in discussion, but right now we're just going to
19 look at what National List definition comments we got directly.

20 So large compost -- I'm going to just kind of go
21 through the public comments that were directly commenting on
22 the work we did on the definition and the practice standard.
23 So large compost nonprofit organizations supported the
24 technical review rather than blanket approval. They liked the
25 National List process path and the NOSB's process for

1 evaluating materials entering compost making.

2 They expressed a concern about contamination and best
3 practice, and they want to continue to work to seek better
4 labeling and education to minimize any problems of
5 contamination, and that the quality of compost is really
6 important to compost makers, and that in this particular
7 comment, they supported how we're going about doing this
8 because they seek the support for a technical review process
9 and for research priorities -- like we were mentioning -- going
10 towards the really high-quality compost and really
11 understanding.

12 I think there was a suggestion that the Seal of
13 Testing Assurance could be a great tool for us, and I love the
14 Seal of Testing Assurance that comes through the U.S. Compost
15 Council, and I think that organic has difficulty like
16 referencing a non-governmental framework, and so we couldn't
17 consider that in this context.

18 So there was some questions about mesophilic and
19 thermophilic, but we got a lot of support for our dovetailing
20 of the AAPFCO definition and the importance of those two
21 things, and so the way we indicate mesophilic and thermophilic
22 and the stabilization in the definition was supported. A
23 fertilizer company supported the modernization to align with
24 AAPFCO and appreciated the adjustments to 203. Methods on how
25 to get there should be referenced, and a lot should be left to

1 the discretion of compost operators as needed. And a nonprofit
2 group supported the definition and 203 upgrades.

3 And then there were some questions around the
4 necessity of this phrase, "permitted synthetic feedstocks," and
5 there's a group stating that they don't support the addition of
6 synthetic materials as compost feedstocks. I view the addition
7 of that phrase as an indication that there's only one way into
8 organic crop inputs and that is through the National List. I
9 didn't view that as an open door.

10 Another nonprofit group emphasized that the NOSB must
11 maintain control over synthetic materials allowed in organic
12 production. There's a hesitation about the entry of compost
13 feedstocks from that nonprofit group because contaminants in
14 broadly-defined compost feedstocks cannot be predicted, and
15 history suggests more persistent toxic pollutants will be
16 found. They also agreed with the elimination of the carbon to
17 nitrogen ratio.

18 A farmer association certifier, again, didn't like
19 this permitted synthetic compost feedstock phrase. And then
20 there was broad support for the changes to the time and
21 temperature language in the proposal.

22 I think that covers the ins and outs of what feedback
23 we received directly on the definition in 203.

24 SECRETARY LEWIS: I'll just add one more series of
25 comments that I want to respond to directly, relate to sort of

1 the grammatical structure of our proposed definition and the
2 potential for a compost pile to be made entirely of synthetic
3 feedstocks. And I'm a sort of amateur grammarian, so I
4 might've overlooked that, and I defer to others with that
5 expertise, but I want to be clear that our intention was not to
6 open the door for a completely synthetic pile.

7 I think partly Mindee and I are focused -- like we
8 live in the world of compost, so we just sort of know you can't
9 actually make a compost pile out of a pile of plastic bags or a
10 pile of cardboard. It's just not -- it won't compost. You
11 need a balance of C to N. You need free airspace. You need
12 enough moisture. Like you need all these things to happen in
13 order for it to actually be a compost pile, and a pile of
14 compostable bags isn't going to go there. So I think we have
15 heard that. It's certainly not our intention to allow for a
16 fully synthetic pile of compost.

17 BOARD MEMBER JEFFERY: Yeah, I think that's a pretty
18 good place to stop in the overview. So we're happy to hear
19 questions.

20 Turn it back to Logan?

21 CHAIR SMITH: Sorry, I'll facilitate the Q&A since
22 Logan can't see everybody.

23 Brian?

24 BOARD MEMBER CALDWELL: Thank you, Mindee and Nate
25 for the work on this. It's quite an impressive document. A

1 couple questions, and I apologize, my brain might be slightly
2 fried, so maybe you talked about this. But was there an issue
3 about whether compost could only be aerobic?

4 BOARD MEMBER JEFFERY: We added the word aerobic to
5 the definition at the suggestion of the larger compost
6 organizations, and it's in the AFE -- you know, all the
7 acronyms -- and the FDA and the EPA both reference aerobic
8 composting.

9 And so I went back and looked at the 2017 proposal to
10 the Board to allow anaerobic digestate, and sort of
11 tangentially noticed that there are different pathogen concerns
12 for anaerobic systems. And so for me, I felt comfortable with
13 the wording because of all the cross-references, and because I
14 think that if we were going to really go forward on anaerobic
15 we might need to do some work on different pathogens, from what
16 I read in that NOSB document.

17 SECRETARY LEWIS: Great, and if I could add to
18 the aerobic question. I think it's also important to remind
19 everyone on where we're talking about this that this update to
20 this portion of the regulation, its impact is on compost that
21 contains manure that's applied within 90 or 120 days of harvest
22 of the crop.

23 So that is all about a food safety concern, and
24 aerobic composting is an essential element of that pathogen
25 reduction. So if it's anaerobic or you don't meet the time and

1 temperature, it's not like you've applied a prohibited
2 substance, you just must meet that 90 or 120 day withholding
3 time.

4 BOARD MEMBER CALDWELL: Great. The other question
5 that just occurred to me was is there any interface between
6 this proposal and the mushroom standards that are currently
7 being looked at? There's like a, you know, part of the -- I
8 apologize, but it's under -- what am I trying to say? The
9 market development rule, thank you, yes. Is there any
10 interface there, or would that --

11 SECRETARY LEWIS: That was a great question. It
12 might be one for the Program to, yeah, Jenny, I think the
13 questions -- well, I'll elaborate the question to get you - let
14 you say.

15 DR. TUCKER: Sorry, yeah.

16 SECRETARY LEWIS: No, you're all good. The question
17 is related to, you know, if we pass this as an update to a
18 definition, you all are working on a rule that also updates the
19 definition of compost. What's the interface there?

20 DR. TUCKER: Yeah, so it's like 10 degrees warmer in
21 the back of the room than up here, so I was trying to get warm,
22 but I was listening.

23 So we can't talk too much about the MDR rule because
24 it's so in that process. However, I don't think it's something
25 that we need to worry about here, that any definition of

1 compost for the market development rule will be a discreet
2 definition for that intent and purpose separate from this work.
3 Okay? It is a separate part of the practice standard. Sort of
4 like there are two definitions of petition, you know, there
5 could be separate definitions here. Okay?

6 SECRETARY LEWIS: Thanks.

7 DR. TUCKER: Man, it's cold up here.

8 CHAIR SMITH: Allison?

9 BOARD MEMBER JOHNSON: Yeah, shivering a little bit,
10 but all good.

11 Thank you so much for your work to kind of pave out a
12 path for us to figure out this issue. It's really hairy, there
13 are a lot of pieces, and I think biting off chunks and moving
14 forward in this methodical way, it makes it manageable for me,
15 for our stakeholders. So I appreciate your thought and
16 leadership in how we tackle it.

17 I hear from BPI and the urgency that I think is tied
18 to this California law that makes compostability hinge on our
19 decisions here, so I hope our friends in California are paying
20 attention to this process and see that we're on a path to make
21 decisions. I think that law sets a January 2026 deadline that
22 has room for a five-year extension. If it looks like materials
23 will be listed soon, and I think in regulatory life we're
24 moving fast, and soon is within that 2031 realm of possibility.
25 So hopefully the process you've laid out gives some security

1 there that we'll have a decision in time for the industry to
2 adjust accordingly.

3 Nate, at the end you brought up the definition which
4 does give me pause, especially as we are entering this realm of
5 a whole new world of what products are out there with
6 compostable claims, how they're made, what they are. So,
7 lawyer hat on, I do think it's unsafe to have a definition that
8 could have a standalone synthetic compost pile, you know, in
9 the case that there's some material that comes along and could
10 compost independently or whatever.

11 So I have a friendly, I think, technical amendment to
12 suggest that would solve that, I believe, that I think we could
13 move forward with today. So the first phrase is the product of
14 managed aerobic biological decomposition of a plant and/or
15 animal material, which we want to be the bulk of compost,
16 comma, and then I think if we strike and/or and say which may
17 also include permitted synthetic compost feedstocks, I think
18 that shows our intent that compost is plant and/or animal
19 material and sometimes may also include those allowed
20 synthetics.

21 So I'd like to see that subbed in if folks are
22 comfortable with that. I think that just gets at that, you
23 know, 1.01 percent chance that we have some weird synthetic-
24 only compost pile come along that we don't anticipate now.

25 VICE CHAIR BRUCH: Can you say it again?

1 BOARD MEMBER JOHNSON: Yeah. So up to plant and/or
2 animal materials, comma, remains the same. Strike the next
3 and/or, and replace that with which may also include -- and
4 then continue on to permitted synthetic compost feedstocks.

5 CHAIR SMITH: Amy?

6 VICE CHAIR BRUCH: Thanks, Kyla.

7 Mindee, Nate, thank you so much. I think this is
8 another great example of just the technical expertise our board
9 has. I appreciate the leadership you've had on this subject
10 matter.

11 Allison, also, that was excellent from a farmer hat.
12 We do appreciate the precautionary stance with the definition.
13 I think that that would get after concerns that I potentially
14 would have too if we made that minor correction. So thanks,
15 Allison.

16 I think for me, part two -- which Nate alluded to --
17 is where we're going to really have to dive in. Part one for
18 sure, and I appreciate the process-driven approach, but part
19 two, as a farmer, I really want to request farmer voices in
20 that process. I feel like that was missing with some of our
21 public comments.

22 So I'm requesting farmers who will be the recipient
23 of this compost -- they are not far removed from this equation
24 -- they will be the direct recipient, and we need to hear from
25 them for sure, because as a farmer myself I am concerned with

1 PFAS, I am concerned with microplastics, and I see some
2 parallelism with what the farmers are experiencing with PFAS
3 contamination with the bio-sludge.

4 So that definitely is in the back of my mind, and I
5 think we have to be very cautious because we can right now.
6 PFAS, there's some remediation techniques available for water.
7 I'm not familiar with any remediation techniques for soil, and
8 it is a forever chemicals. So we do have the weight, a big
9 weight on our shoulders to make sure we go through the second
10 part of the process really well. I think the TR will be a
11 great, great step in that direction, but I really appreciate
12 the work that you guys have done. Thank you.

13 CHAIR SMITH: Franklin?

14 BOARD MEMBER QUARCOO: Yes. I just want to share
15 some of the things that have been running through my mind when
16 it comes to plastics in compost. Now, if all the research that
17 is going into making compostable plastic, it's all great, it's
18 better than where we were. But with folks farming organic, if
19 we put that in compost -- and I've asked this question before
20 -- what is the fitness cost to the microorganisms breaking it
21 down?

22 If we find out later that there's a group that is
23 trying to keep clean -- there's a general problem of plastic
24 that we need to solve anyway -- there's a group that is doing
25 a great job moving from the conventional plastic, but we decide

1 to put it in our compost and we find out that it's affecting
2 the same microorganisms we depend on, and it's selecting some
3 of them, and letting some of them survive, removing the
4 diversity, then later on down the line we'll be now trying to
5 find out how we deal with that problem.

6 So I'm looking for a microbiologist, soil
7 microbiologist, who would tell us what the fitness cost to
8 those -- after you develop the compost, and you go take it, use
9 it -- now the microorganisms that are in your soil, I'm not
10 saying there'll be a problem. I just want to know before we
11 make that decision.

12 SECRETARY LEWIS: Yeah, Franklin, I think your point
13 is well taken, and something we have embraced in our process
14 here. And it, I think, illustrates the power of the National
15 List process as the right path for evaluation of these
16 substances because we can evaluate a number of factors. One,
17 the fate of these substances in the pile, and the ultimate on
18 the soil. To Amy's point, we can evaluate the impact of these
19 substances on the microbes of the pile and how they perform
20 once they get into the soil, and we can evaluate the impact on
21 use patterns of the substances when it comes to waste
22 reduction.

23 So I think we are all in this Earth together, and
24 organic does have a role in sort of seeing how our market force
25 can affect change, so we can talk about use patterns. I sort

1 of bring it back to the paper, which is already on the list as
2 a compost feedstock. It was put on the list essentially for
3 leaf collection bags in the fall, when people rake up their
4 leaves, and they want to compost the bag and the leaves that
5 are in it.

6 So I think we have a lot of work to do on paper in
7 compost, as well as these new substances, but the beauty of the
8 TR process or, you know, getting a big, complicated external TR
9 on these substances which we've already done, allows us to
10 evaluate that full spectrum of considerations.

11 BOARD MEMBER QUARCOO: Thank you.

12 CHAIR SMITH: Allison?

13 BOARD MEMBER JOHNSON: Nate, you just reminded me, I
14 was supposed to correct myself from a question I asked last
15 week when I was characterizing paper as non-synthetic. I was
16 thinking that just the ink is synthetic, but it is actually the
17 chemicals used in the papermaking process that make it a
18 synthetic.

19 But I did hear in comments a desire for some clarity
20 on paper, and that seems like that kind of class of what's
21 already going into a lot of compost under the umbrella of paper
22 might be a good test run for the TR process, and the next
23 steps, and how we use this synthetic piece of the definition.
24 So just a plug for taking paper products on sooner rather than
25 later.

1 SECRETARY LEWIS: Yeah, I think that's definitely
2 part of our intention, where this proposal is our stake in the
3 ground that we have the authority over the National List, which
4 includes compost feedstocks, and that will then give us the
5 runway to evaluate what's already on there and what new sets of
6 substances should or should not be added.

7 CHAIR SMITH: Amy?

8 VICE CHAIR BRUCH: Yeah, thank you, Allison. That
9 reminds me, I think Wood -- not to put you on the spot --
10 didn't you review this material at the last sunset review,
11 newspaper?

12 BOARD MEMBER TURNER: Did I review paper? Yeah.

13 VICE CHAIR BRUCH: Yeah, do you recall any highlights
14 from that conversation? Sorry, to put you on the spot.

15 BOARD MEMBER TURNER: I don't call it putting me on
16 the spot. I was actually just thinking about Steve Villa and
17 paper pots for a second there. So, sorry, caught got me off
18 guard. I don't have any quick reaction, sorry.

19 VICE CHAIR BRUCH: Okay. No worries.

20 BOARD MEMBER TURNER: There's a lot to look at. I
21 mean, I think Allison's right.

22 VICE CHAIR BRUCH: Yeah.

23 BOARD MEMBER TURNER: I think we need to -- it merits
24 a deeper analysis in this context, but yeah.

25 VICE CHAIR BRUCH: Yeah, no, that's a good point. We

1 can potentially go back to public comments from that era as
2 well. There's a lot of information about that conversation
3 too.

4 CHAIR SMITH: Mindee?

5 BOARD MEMBER JEFFERY: Just in the interest of
6 protecting your schedule, do we want to sit with this because
7 we have a friendly amendment, so that poses two questions to
8 me, A, like do we want to talk about the definition and the
9 practice standard language that we're voting on anymore? And
10 then to the Program and to the Chair, is changing and/or in
11 both the practice standard and the definition, too, which may
12 also include a substantive change. And then -- so I can stop
13 there and then I have one more.

14 CHAIR SMITH: I personally don't think it's a
15 substantive change.

16 BOARD MEMBER JEFFERY: Changing and/or to which may
17 also include. Because we could defer the vote, get it up on
18 the screen, let everybody look at it, and then vote at this at
19 the end. But if we're comfortable here, then we can move on,
20 so that's my question.

21 BOARD MEMBER HUSEMAN: I suggest that we defer, just
22 to see it up on the board.

23 CHAIR SMITH: I'm fine with that.

24 BOARD MEMBER JEFFERY: So then are -- more discussion
25 from the Board on the particulars of this?

1 CHAIR SMITH: I don't see any.

2 SECRETARY LEWIS: Great. So Mindee and I will do a
3 little editing, then we'll revisit it tomorrow afternoon in the
4 deferred votes, yeah.

5 CHAIR SMITH: Okay. Yep. Thanks, Nate, Mindee. And
6 again, yeah, I just want to again applaud your expertise on
7 this subject matter.

8 Logan, back to you. You're muted.

9 BOARD MEMBER PETREY: Thank you, Kyla. Thank you all
10 so much.

11 Okay. Moving on to pear ester, with Franklin.

12 BOARD MEMBER QUARCOO: Okay. So this is a discussion
13 document to add pear ester to the National List as a synthetic
14 allowed for use in organic crop production. This all started
15 as a result of a petition to the National Organic Program last
16 year to add pear ester.

17 Now, pear ester was originally classified as a
18 pheromone, and it is not a pheromone. Technically, it's a
19 kairomone. So when it was later reclassified correctly as a
20 kairomone, then it couldn't be used under the pheromone
21 classification. So this is an attempt to get it into use in
22 the correct category. Okay?

23 So kairomones, allomones, pheromones, these are all
24 semiochemicals, and they are behavior-altering chemicals. Some
25 of them are released by one species, and then it causes a

1 behavioral physiological change in another species. Some of
2 them, it's released between the same species, and the
3 differences are who benefits from the signal that is sent, and
4 this is like in the insect world.

5 So let me talk about some of the subcategories of
6 semiochemicals. We have pheromones, and there are different
7 types. There are sex pheromones that are used for mating
8 purposes. They will tell you the sexual receptivity of the
9 female dominance status. There are pheromones that help
10 insects determine dominance status. Okay. Some of them can
11 also signal danger. So there's a lot of communication that
12 goes on with these chemicals. And when it comes to sex
13 pheromones in particular -- which a lot of what is being done
14 here is the kind of pheromone they use, that one is very
15 specific. It has to be between the same species.

16 Okay. Then we have kairomones. Some people choose
17 to call them food callers. It's released by one organism, but
18 the receiving organism is the one that benefits, and that's the
19 technical -- some of the differences between the kairomone we
20 are dealing with, which is pear ester. It used to be not
21 correctly classified as a pheromone. So when you use a
22 kairomone, one of the benefits is that it will help you avoid a
23 predator or find a suitable host plant. So that's why they
24 call it a food caller.

25 There's another one called allomones where it is the

1 same that is benefitted. So I'm talking about all this to show
2 why there had to be a separation between these products. And
3 so we have kairomone that we are dealing with now. Okay.

4 So where do we get it from? It was first isolated
5 from Bartlett pears, and we have a synthetic version which it
6 sort of causes insects to behave differently, and I'll
7 summarize it so this doesn't get too long.

8 If you use a pheromone, and it's a sex pheromone,
9 it's basically attracting -- and there are a few instances
10 where it is the other way around, it is a male attracting the
11 female -- but most of the time in the insect world it is the
12 female that is releasing the pheromone attracting the male.
13 Now, that is limited, it only attracts the males. But when you
14 use a food caller, it attracts both males and females.

15 And I'm going to be talking -- so we use pheromones
16 to monitor and then get at what we call a biofix point. For
17 codling moth, it'll be the first time the codling moth is
18 caught in the trap. Now, if you don't do something about it,
19 at that point you are late.

20 Now, if you use just pheromones, and the egg gets
21 saturated, then after some time if you are using it for
22 monitoring purposes you will no longer -- because the egg is
23 already saturated with pheromones, and then you have pheromones
24 in a trap, so that will not be effective. Then you need a
25 kairomone which attracts both males and females, then you can

1 still be able to do stuff.

2 So what I'm trying to say is that those who use this
3 product, it's really important, the risk reclassification
4 should not deprive farmers of this useful tool because, if they
5 don't get it right and get the biofix point right and start
6 treating and doing the things that they need to do, it's
7 already too late. In the insect pest management world, if you
8 are late, you lose.

9 So this is a very useful tool that is needed, and all
10 kinds of information. If it comes to environmental impact,
11 health impact, the beauty of pheromones and all these volatile
12 compounds that affect behavior is that they stay in the
13 receptacle. It's not like a liquid that is released into the
14 environment. They stay where there is a passive thing. It
15 attracts the target to come to it instead of the chemical going
16 to them.

17 So we have the discussion document, there are all
18 kinds of things that we can discuss, but if there are any
19 questions, I'll be happy to take them. But it's a very
20 important tool for insect pest management.

21 CHAIR SMITH: Nate Lewis?

22 BOARD MEMBER LEWIS: I think one of the aspects of
23 this petition that I'm interested in continuing to evaluate is
24 whether they should be listed as a broad class of substances,
25 as just synthetic kairomones, because of how you elegantly

1 described they are a central element of pest management, or if
2 we need to list just pair esters is petitioned.

3 And I think there's some work we need to do to figure
4 out what's possible or not, but I just wanted to highlight a
5 comment that was helpful and illustrative to me that we
6 received, which was that many of the other kairomones are non-
7 synthetic substances and therefore do not need to be on the
8 National List. So I just think there's more to work there, but
9 we should keep our classification wits about us as we evaluate
10 this for its listing in the future.

11 BOARD MEMBER QUARCOO: Yeah, that's why I'm happy
12 it's a discussion document at this point, so we still have
13 time.

14 CHAIR SMITH: Amy?

15 VICE CHAIR BRUCH: Franklin, nice work.

16 BOARD MEMBER QUARCOO: Thank you.

17 VICE CHAIR BRUCH: Congratulations. This is your
18 first discussion document, isn't it?

19 BOARD MEMBER QUARCOO: Yes.

20 VICE CHAIR BRUCH: Okay. I think you're the right
21 person for this. You can connect the scientific world to the
22 pharma world, and you did it beautifully. I appreciate that.

23 One thing that I caught from public comments, and we
24 can tackle this in the proposal as well as the delivery
25 mechanism. You kind of mentioned kairomones in a trap, and I

1 believe, you know, full yearly this could also be essentially
2 put on crops. So I think there was some concerns with the
3 public with the delivery mechanism, so it'll be good to kind of
4 unpackage that when we move to the next round.

5 BOARD MEMBER QUARCOO: Yeah, and that's why in there
6 you find out that if it is at least three of unknown, then you
7 cannot use an active dispenser. It has to be a passive
8 dispenser, depending on the insect to come to it instead of the
9 chemical going to the insect. So, yes, there's still some work
10 to be done there.

11 VICE CHAIR BRUCH: Thank you.

12 CHAIR SMITH: Excellent work, Franklin. I don't see
13 any other hands. So, yeah. I was like, oh, yeah, we're not
14 voting, so I sort of forgot, and I'm glad that we have some
15 more time to talk about this one as well.

16 BOARD MEMBER QUARCOO: I have a question, though,
17 adding it in.

18 CHAIR SMITH: Yes.

19 BOARD MEMBER QUARCOO: So is there a particular --
20 one of the things we put in the document is that we are looking
21 for information about any safety concerns or anything that the
22 general public has. So it's still important for us to find out
23 -- including what Nate talked about, are there other products
24 -- so we still would like some information that is needed so we
25 can address it.

1 CHAIR SMITH: Sounds like the public has some
2 homework assigned by Professor Franklin over here.

3 All right. Logan, back to you.

4 BOARD MEMBER PETREY: Thank you.

5 Thanks, Franklin.

6 Okay. So moving along to hydrogen peroxide.

7 Wood.

8 BOARD MEMBER TURNER: Just a quick shout out to
9 Dr. Quarcoo. I just -- I'm amazed by my colleague, and I'm so
10 happy to be on the Board with him. I always learn something
11 every time I listen to him talk, so it's great to have him with
12 us. I think about that both in the context of what he just
13 talked about and the presentation he already gave this morning
14 about the use of hydrogen peroxide in livestock applications.
15 I've got it in crops.

16 It's at 601(a) and 601(i), as an algaecide,
17 disinfectant and sanitizer, including irrigation system
18 cleaning systems, and as plant disease control.

19 It's used as a material that we all know well. It's
20 used widely across organic in a number of different
21 applications as described in the listing. It has historically
22 been -- has moved through organic review, sunset review,
23 without dissent, and that seems to be our situation this time.

24 We have 19 unique comments in support of maintaining
25 this listing or suggesting a widespread use of the material as

1 included in NOSB's. So I think we can move forward fairly
2 quickly here in terms of the vote. I don't know if there's two
3 votes or one vote, since there's two listings, but I'll defer
4 to you on that, Kyla.

5 One thing I did want to say is -- and I did talk to
6 an MRO about this, and we saw this in the comments. When we
7 talk about ancillary substances in crops listings, that's
8 actually not correct as I understand it. The reference in
9 crops should be other ingredients, not ancillary substances.
10 So it's ancillary substances in livestock and handling. In
11 crops it's other ingredients. So I would update the write-up
12 on this to have the header of that section be other
13 ingredients, not ancillary substances.

14 CHAIR SMITH: Questions for Wood?

15 Okay. We're just going to take one vote. So the
16 motion comes before the Board to remove hydrogen peroxide from
17 the National List at 205.601(a)4 as well as at 205.601(i)5.
18 The motions come before the Board. The first listing was
19 motioned by Wood and seconded by Amy. The second listing was
20 motioned by Wood and seconded by Logan.

21 And the vote starts with Jerry.

22 BOARD MEMBER D'AMORE: No.

23 BOARD MEMBER DIMITRI: No.

24 BOARD MEMBER NANDWANI: No.

25 BOARD MEMBER CALDWELL: No.

1 BOARD MEMBER JOHNSON: No.

2 SECRETARY LEWIS: No.

3 VICE CHAIR BRUCH: No.

4 BOARD MEMBER QUARCOO: No.

5 BOARD MEMBER POWELL-PALM: No.

6 BOARD MEMBER HUSEMAN: No.

7 BOARD MEMBER TURNER: No.

8 CHAIR SMITH: Logan?

9 BOARD MEMBER PETREY: No.

10 CHAIR SMITH: Chair votes no.

11 SECRETARY LEWIS: 0 yes, 14 no, no abstentions.

12 BOARD MEMBER POWELL-PALM: We didn't get Mindee.

13 SECRETARY LEWIS: Oh, 13, sorry. Mindee is absent.

14 0 yes, 13 no, no abstentions, no recusals, 2 absent.

15 CHAIR SMITH: The motion fails?

16 SECRETARY LEWIS: The motion fails.

17 CHAIR SMITH: All right.

18 SECRETARY LEWIS: It's getting to be the lunch hour,

19 I guess.

20 CHAIR SMITH: Back to you, Logan.

21 BOARD MEMBER PETREY: Yep. Thank you.

22 Okay. Moving on to soaps. Ammonium soaps, with Amy.

23 VICE CHAIR BRUCH: Thank you, Logan. All right.

24 Soaps, ammonium. We're going to use a summarized sunset

25 process here. The use for this and ammonia soaps is approved

1 by the National Organic Program for various crop uses, but we
2 are looking only at one which is for large animal repellent
3 only, no contact with soil or edible crops.

4 So the prior Board reviews have chosen to relist
5 this. It was a 13-0 the last time. So it was unanimously
6 listed, and it was voted out of subcommittee unanimously.

7 There are many -- the one thing with this, and I do
8 have a picture here, I appreciate the picture, show and tell
9 continues. This was found in written comments, and I just
10 thought the visual was really helpful.

11 There are a lot of alternative means to prevent pests
12 that are natural. However, what commenters mentioned is
13 they're not always effective or they need to be used in tandem
14 with this substance. And as you can see there, large animals
15 can jump fences and cause damage to trees. So the idea by a
16 lot of commenters is that this is a substance that needs to be
17 used in tandem with other natural prevention mechanisms.

18 To highlight additional public comments, certifiers
19 mentioned that over the years there's actually an increased
20 amount of producers listing this on their OSPs. There are
21 limitations with some of the non-synthetic or fear-based
22 alternatives.

23 And also to highlight some concerns, there was one
24 commenter that was against relisting, they had concerns with
25 drift, so I wanted to highlight that. And then there was one

1 group that also had a non-position due to alternatives. They
2 thought the alternatives available were sufficient enough, so
3 they'd like to take a non-position on that.

4 So with that review, I will open it up to any
5 discussion.

6 Yes, Nate?

7 SECRETARY LEWIS: Oh, never miss an opportunity to
8 remind everybody that there is a whole regulation that precedes
9 the National List, and that the Crop Pest, Weed, and Disease
10 Management Standard requires preventative practices that
11 include mechanical and biological means before you can use the
12 synthetics that are on the National List.

13 VICE CHAIR BRUCH: Thank you, Nate, for that
14 reminder. Appreciate that.

15 CHAIR SMITH: Okay. I don't see any other comments.
16 We'll move to the vote. The motion to remove ammonium soaps
17 from the National List comes before the Board from
18 subcommittee, motion by Amy, seconded by Nate Lewis.

19 The vote starts with Carolyn.

20 BOARD MEMBER DIMITRI: No.

21 BOARD MEMBER NANDWANI: No.

22 BOARD MEMBER CALDWELL: No.

23 BOARD MEMBER JOHNSON: No.

24 SECRETARY LEWIS: No.

25 VICE CHAIR BRUCH: No.

1 BOARD MEMBER QUARCOO: No.

2 BOARD MEMBER JEFFERY: No.

3 BOARD MEMBER POWELL-PALM: No.

4 BOARD MEMBER HUSEMAN: No.

5 BOARD MEMBER TURNER: No.

6 CHAIR SMITH: Logan?

7 BOARD MEMBER PETREY: No.

8 BOARD MEMBER D'AMORE: No.

9 CHAIR SMITH: Chair votes no.

10 SECRETARY LEWIS: 0 yes, 14 no, no abstentions,
11 no recusals, 1 absent. The motion fails.

12 CHAIR SMITH: Back to you, Logan.

13 BOARD MEMBER PETREY: Next we have oils,
14 horticultural, with Brian.

15 BOARD MEMBER CALDWELL: All right. Thank you, Logan.
16 Horticultural oils, I'm also going to use the summarized sunset
17 process. It's listed in two places, and I'm just going to
18 review them together, and we'll take two separate votes, I
19 think. Is that right? Because, I mean, the discussion is very
20 similar for both.

21 So they were both unanimously voted to relist in 2019
22 last time they were reviewed. Our Crop Subcommittee has
23 unanimously voted to move them forward and relist.

24 And in terms of written comments, there were eight in
25 favor. And one comment said that essential uses should be

1 identified, and if there were none, it should be delisted.
2 However, many of our other comments said that these materials
3 were essential. So I think that that kind of answers that
4 question.

5 The only thing that I would want to say is that there
6 has been considerable research on vegetable oils to be used in
7 the same way as these horticultural oils -- which are
8 petroleum-based -- are used. And I really don't think that the
9 -- this is another example where I don't think the research
10 results have gotten out there, and I encourage farmers to look
11 at the data to experiment with some of the vegetable oils that
12 are available. There were concerns about phytotoxicity and
13 that they didn't last as long and that sort of thing. I think
14 there are some good ones out there so just wanted to kind of
15 alert the community that I think it's good to check these
16 alternatives out.

17 But that being the way it is, this is a proven,
18 effective, inexpensive and widely-used control for both insects
19 and diseases in fruit and vegetable crops. So the Livestock
20 Subcommittee -- I'm sorry, Crop Subcommittee, excuse me --
21 recommends that both be relisted. Any questions?

22 CHAIR SMITH: I don't see any. We'll move to the
23 vote. So we'll vote twice. What's on the screen here is the
24 motion to remove horticultural oils from the National List at
25 (e)7 as an insecticide, or oils, horticultural. It comes

1 before the Board out of a subcommittee motion by Brian and
2 seconded by Jerry.

3 The vote starts with Dilip.

4 BOARD MEMBER NANDWANI: No.

5 BOARD MEMBER CALDWELL: No.

6 BOARD MEMBER JOHNSON: No.

7 SECRETARY LEWIS: No.

8 VICE CHAIR BRUCH: No.

9 BOARD MEMBER QUARCOO: No.

10 BOARD MEMBER JEFFERY: No.

11 BOARD MEMBER POWELL-PALM: No.

12 BOARD MEMBER HUSEMAN: No.

13 BOARD MEMBER TURNER: No.

14 CHAIR SMITH: Logan?

15 BOARD MEMBER PETREY: No.

16 BOARD MEMBER D'AMORE: No.

17 BOARD MEMBER DIMITRI: No

18 CHAIR SMITH: Chair votes no.

19 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions,
20 0 recusals, and 1 absent. The motion fails.

21 CHAIR SMITH: Okay. Again, horticultural oils are
22 listed again at 205.601(i)7 as plant disease control. So the
23 motion comes before the Board to remove this listing from the
24 National List. It was motioned out of subcommittee by Brian
25 and seconded by Jerry.

1 And the vote starts with Jerry.

2 BOARD MEMBER CALDWELL: I think it starts with me.

3 CHAIR SMITH: Right, Brian. I looked at you and said
4 Jerry. My apologies.

5 BOARD MEMBER CALDWELL: No.

6 BOARD MEMBER JOHNSON: No.

7 SECRETARY LEWIS: No.

8 VICE CHAIR BRUCH: No.

9 BOARD MEMBER QUARCOO: No.

10 BOARD MEMBER JEFFERY: No.

11 BOARD MEMBER POWELL-PALM: No.

12 BOARD MEMBER HUSEMAN: No.

13 BOARD MEMBER TURNER: No.

14 CHAIR SMITH: Logan?

15 BOARD MEMBER PETREY: No.

16 BOARD MEMBER D'AMORE: No.

17 BOARD MEMBER DIMITRI: No.

18 BOARD MEMBER NANDWANI: No.

19 CHAIR SMITH: Chair votes No.

20 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions,
21 0 recusals, 1 absent. The motion fails.

22 CHAIR SMITH: Okay. Back to you, Logan.

23 BOARD MEMBER HUSEMAN: Kyla, I have a question real
24 quick, sorry.

25 CHAIR SMITH: Yeah.

1 BOARD MEMBER HUSEMAN: This can just be a yes or no
2 question or answer. I'm just curious just from a consistency
3 standpoint, hydrogen peroxide is listed at 601(a) and 601(i),
4 and it's combined.

5 CHAIR SMITH: I don't know the answer. I don't know
6 why we voted. I don't know.

7 BOARD MEMBER HUSEMAN: Something maybe for Crops to
8 consider moving forward, for efficiency.

9 CHAIR SMITH: Yeah, fair. They were on the same
10 slide. I did it together. It's my only explanation.

11 BOARD MEMBER PETREY: Okay.

12 BOARD MEMBER HUSEMAN: All is good, thanks.

13 BOARD MEMBER PETREY: Thank you.

14 CHAIR SMITH: Logan, back to you.

15 BOARD MEMBER PETREY: Okay. Next we have pheromones.
16 Franklin, please take it away.

17 BOARD MEMBER QUARCOO: Yes, So back -- it's a good
18 thing I talked about kairomones just before pheromones because
19 some of the things will be repetitious, so I'll skip that
20 because I talked about pheromones when I was talking about
21 kairomones.

22 So pheromones are listed under 205.601. We've
23 already talked about what they are used for. They help farmers
24 to determine exactly when to do what. They are management
25 tools in themselves, okay? So if you want to detect any

1 particular pest, you want to monitor, and pheromones help to
2 monitor. You have traps, you put pheromones -- synthetic
3 pheromones -- in there, they attract males so you can tell.

4 It also helps to reduce the male to female ratio
5 because if you do mass trapping of males, that's if the insect
6 has a one-to-one ratio, and you are trapping a lot of males,
7 guess what? Females are not going to have enough males
8 available for mating. So you are monitoring, but you are also
9 managing the pest. And also when those pheromones are released
10 into the environment, and it's all over the place, and the air
11 is saturated, what happens is that the male insect no longer
12 knows where the females are because the pheromone is all over
13 the place, so it causes mating disruption.

14 And sometimes, because the synthetic pheromone is
15 highly concentrated, the male is busy looking for what he
16 considers a very special female instead of actually mating with
17 the regular females that are there because the natural
18 pheromone is lower. So you are causing a lot of disruption in
19 their lifestyle for our benefit.

20 So it's a very useful tool, pheromones. So having
21 said all the things that I said when I was talking about
22 kairomones, I sort of combined both of them. So it's come up
23 as a sunset document. It's very useful for farmers, like I
24 said, for monitoring and for actual management.

25 And also, same thing applies. It's in a receptacle.

1 There are active dispensers, there are passive dispensers,
2 there are different types of dispensers. If it's an active
3 dispenser where you actually spray the stuff, then you cannot
4 use inerts, you know, these three, because the inerts of
5 unknown toxicity, you cannot use active dispensers. So for
6 most of them, it's passive dispensers. You rely on the insect
7 to come to the trap so the chemical is not released outside.

8 So that's that. The subcommittee has been all for
9 it. When it comes to environmental hazards, health hazards,
10 the thing is not -- it's in a receptacle, it's at a location,
11 so not much of a problem.

12 Any questions on this?

13 CHAIR SMITH: Nate?

14 SECRETARY LEWIS: Just a brief comment about the
15 importance of pheromones to the tree fruit growers in the
16 Pacific Northwest. You know, we produce most of the apples --
17 the organic apples -- but this is a foundational tool for all
18 the IPM -- Integrated Pest Management Programs -- both organic
19 and conventional. So I think it's a great example of an
20 organic mindset that has been adopted industry-wide to reduce
21 pest pressure. So just wanted to make that note.

22 BOARD MEMBER CALDWELL: Ditto for the Northeast.

23 CHAIR SMITH: Okay. Nate?

24 BOARD MEMBER POWELL-PALM: I'm used to being
25 surrounded by really smart people on this board, but listening

1 to Franklin I'm just reminded at how smart some of us are. So
2 thank you, Franklin, for bringing this expertise. All of us
3 are, but really appreciate that. That was great.

4 CHAIR SMITH: Okay. With that, we'll move to the
5 vote. The motion is to remove pheromones from the National
6 List. It comes before the Board, seconded out of subcommittee
7 from Franklin -- or a motion by Franklin and seconded by Brian.

8 And the vote starts with Allison.

9 BOARD MEMBER JOHNSON: No.

10 SECRETARY LEWIS: No.

11 VICE CHAIR BRUCH: No.

12 BOARD MEMBER QUARCOO: No.

13 BOARD MEMBER JEFFERY: No.

14 BOARD MEMBER POWELL-PALM: No.

15 BOARD MEMBER HUSEMAN: No.

16 BOARD MEMBER TURNER: No.

17 CHAIR SMITH: Logan?

18 BOARD MEMBER PETREY: No.

19 BOARD MEMBER D'AMORE: No.

20 BOARD MEMBER DIMITRI: No

21 BOARD MEMBER NANDWANI: No.

22 BOARD MEMBER CALDWELL: No.

23 CHAIR SMITH: Chair votes no.

24 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions,
25 0 recusals, 1 absent. The motion fails.

1 CHAIR SMITH: Back to you, Logan.

2 BOARD MEMBER PETREY: Yeah. All right.

3 Brian, we've got ferric phosphate.

4 BOARD MEMBER CALDWELL: All right. Thanks, Logan.

5 Ferric phosphate is used for slug management
6 basically in vegetable and strawberry fields. It was
7 unanimously passed to be relisted in 2019, and it was
8 unanimously recommended to be relisted by this Crop
9 Subcommittee.

10 In terms of written comments, five were in favor and
11 one was opposed due to the reliance of EDTA, which is a
12 chelating agent, in the formulations. And it's been pretty
13 well documented that EDTA is present in all available
14 formulations, and in fact without EDTA, ferric phosphate really
15 is not effective. So this is yet another example of where our
16 inerts have profound effects.

17 Nonetheless, we requested a technical review for this
18 current round, specifically to ask questions about the
19 combination of ferric phosphate and EDTA and other chelating
20 agents -- which there are a few other ones -- what the effects
21 of that combination is on soil organisms, including earthworms
22 which are mostly the proxy that's used to kind of be a good
23 representative of macro soil organisms.

24 And that TR really spoke to and allayed the concerns
25 that I and others in the community have had about that

1 combination. Basically, any toxic effects are at much, much
2 higher rates than would be encountered from standard label
3 applications. So I felt really good. I was glad after all
4 these years to finally think, okay, this is actually all right.
5 There's not an issue here that is really a bad one.

6 So any questions about that?

7 CHAIR SMITH: Amy?

8 VICE CHAIR BRUCH: Sorry, I just wanted to quickly
9 recognize, Brian, your efforts to try to get after the
10 information. We went back and forth on the TR several times,
11 and that was mainly driven by you trying to get after the right
12 information to analyze for us. So thank you.

13 BOARD MEMBER CALDWELL: Thanks, Amy.

14 CHAIR SMITH: Okay. We'll go to the vote. Motion to
15 remove ferric phosphate from the National List comes before the
16 Board. I keep forgetting to say the listing, my apologies. So
17 this is at 205.601(h)1, as a slug or snail bait. It comes
18 before the Board, motion by Brian and seconded by Nate.

19 And the vote starts with Nate.

20 SECRETARY LEWIS: No.

21 VICE CHAIR BRUCH: No.

22 BOARD MEMBER QUARCOO: No.

23 BOARD MEMBER JEFFERY: No.

24 BOARD MEMBER POWELL-PALM: No.

25 BOARD MEMBER HUSEMAN: No.

1 BOARD MEMBER TURNER: No.

2 CHAIR SMITH: Logan?

3 BOARD MEMBER PETREY: No.

4 BOARD MEMBER D'AMORE: No.

5 BOARD MEMBER DIMITRI: No

6 BOARD MEMBER NANDWANI: No.

7 BOARD MEMBER CALDWELL: No.

8 BOARD MEMBER JOHNSON: No.

9 CHAIR SMITH: Chair votes no.

10 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions.

11 0 recusals, 1 absent. The motion fails.

12 CHAIR SMITH: Back to you, Logan.

13 BOARD MEMBER PETREY: All right. Next we have Jerry
14 with potassium bicarbonate.

15 BOARD MEMBER D'AMORE: Thank you, Logan, yeah.

16 Potassium bicarbonate, 205.601(i), as a plant disease
17 control added to the National List in April 2000. The
18 supporting document underlying this is the technical report at
19 2015. This substance is best suited for powdery mildew
20 diseases and early blight control. When potassium bicarbonate
21 was added to the National List it was described as, quote, a
22 least toxic agronomically desirable material with great
23 efficacy for controlling powdery mildew.

24 The 1999 Technical Advisory Report stated that there
25 is no carcinogenicity, and that no effects of overexposure were

1 documented. The EPA states that potassium bicarbonate is a
2 naturally-occurring compound that is not expected to have
3 adverse effects on humans or the environment when used as a
4 fungicide.

5 Our spring session in Milwaukee, we had a total of 23
6 written and/or oral comments. Nearly all of them were in favor
7 of relisting, with one commenter questioning its
8 classification. For this fall session, there were further
9 supporting comments from the original spring responders plus
10 two new testimonies in support of relisting. The two new
11 responses cited potassium bicarbonate's use as essential for
12 powdery mildew control.

13 The subcommittee finds potassium bicarbonate
14 compliant - oh, I guess I don't read that, do I? So, okay.
15 Thank you. That's it.

16 CHAIR SMITH: Questions for Jerry?

17 Go ahead, Brian.

18 BOARD MEMBER CALDWELL: Yeah, just wanted to point
19 out that sort of over the years we've been looking for
20 alternatives to copper and sulfur as fungicides. And in
21 combination with some other tank-mixed ingredients at my own
22 farm, I've found that I've been able to completely -- well,
23 almost completely eliminate copper sprays and probably use less
24 than half of the sulfur that I used to use when I switched to
25 potassium bicarbonate, so it's really a great tool.

1 CHAIR SMITH: Great. We'll move to the vote. Motion
2 to remove potassium bicarbonate from the National List. It's
3 listed at 205.601(i)9, as plant disease control. It comes
4 motioned out of subcommittee by Jerry and seconded by Wood.

5 The vote starts with Amy.

6 VICE CHAIR BRUCH: No.

7 BOARD MEMBER QUARCOO: No.

8 BOARD MEMBER JEFFERY: No.

9 BOARD MEMBER POWELL-PALM: No.

10 BOARD MEMBER HUSEMAN: No.

11 BOARD MEMBER TURNER: No.

12 CHAIR SMITH: Logan?

13 BOARD MEMBER PETREY: No.

14 BOARD MEMBER D'AMORE: No.

15 BOARD MEMBER DIMITRI: No

16 BOARD MEMBER NANDWANI: No.

17 BOARD MEMBER CALDWELL: No.

18 BOARD MEMBER JOHNSON: No.

19 SECRETARY LEWIS: No.

20 CHAIR SMITH: Chair votes no.

21 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions,
22 0 recusals, 1 absent. The motion fails.

23 CHAIR SMITH: Back to you, Logan.

24 BOARD MEMBER PETREY: All right. Amy, hydrogen
25 chloride.

1 CHAIR SMITH: Magnesium sulfate.

2 BOARD MEMBER PETREY: I missed it. Thank you.

3 Magnesium sulfate, please, Franklin.

4 BOARD MEMBER QUARCOO: Okay. Thank you.

5 So magnesium sulfate is listed under 205.601 as a
6 plant or soil amendment, but it has to be -- it's allowed for
7 use with a documented soil deficiency. The last TR that we
8 have is -- let's see -- is from 2011.

9 It has a lot of -- magnesium sulfate has a lot of
10 uses. and in crop production it's used as a soil amendment.
11 And for plants, the things it does, it helps seeds to
12 germinate, it increases the production of chlorophyll and aids
13 in the production of flowers and there's a long list of things
14 that magnesium sulfate does. It's highly soluble and so it
15 makes it suitable for adding magnesium to plants.

16 Let me also say that it has a number of medicinal
17 uses. It can be used as an anti-convulsant. It can be
18 injected to lower blood pressure of pregnant females suffering
19 from preeclampsia. As far tests can be treated with magnesium
20 sulfate. It can also be used as a laxative.

21 And when it comes to veterinary uses -- so all of
22 this is we're on the cross, but it just shows that it's used
23 for us, it's used for animals, it's used as a bronchodilator,
24 and a whole host of other uses. There are natural forms of it,
25 but a lot of the commercial quantities are gotten from

1 synthetic sources.

2 When it comes to international acceptance, in the
3 Canadian General Standards it's allowed when soil and plant
4 deficiencies are documented by visual symptoms. The European
5 Community, if it's of the natural origin, it's allowed. Codex,
6 allowed for using fertilizing and conditioning. IFOAM allowed
7 regardless of soil deficiency documentation. So, well, it's
8 allowed in a number of places.

9 It's a very important tool, and when I look at the
10 environmental and other things, it's highly soluble, available
11 to plants. I'm comfortable with all the things that I see
12 about magnesium sulfate.

13 So if there are any questions, we can talk about it.

14 CHAIR SMITH: Thanks, Franklin.

15 I don't see any questions. We'll move to the vote.
16 The motion to remove magnesium sulfate from the National List,
17 and it's listed at 205.601(j)6 as a plant or soil amendment,
18 comes before the Board out of subcommittee motion by Franklin,
19 and seconded by Jerry.

20 And the vote starts with Franklin.

21 BOARD MEMBER QUARCOO: No.

22 BOARD MEMBER JEFFERY: No.

23 BOARD MEMBER POWELL-PALM: No.

24 BOARD MEMBER HUSEMAN: No.

25 BOARD MEMBER TURNER: No.

1 CHAIR SMITH: Logan?

2 BOARD MEMBER PETREY: No.

3 BOARD MEMBER D'AMORE: No.

4 BOARD MEMBER DIMITRI: No

5 BOARD MEMBER NANDWANI: No.

6 BOARD MEMBER CALDWELL: No.

7 BOARD MEMBER JOHNSON: No.

8 SECRETARY LEWIS: No.

9 VICE CHAIR BRUCH: No.

10 CHAIR SMITH: Chair votes no.

11 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions,
12 0 recusals, 1 absent. The motion fails.

13 CHAIR SMITH: Back to you, Logan.

14 BOARD MEMBER PETREY: Okay. Now, Amy, hydrogen
15 chloride, please.

16 VICE CHAIR BRUCH: No problem, you just got me on
17 deck. So thank you, Logan, for the heads up.

18 BOARD MEMBER PETREY: Yeah.

19 VICE CHAIR BRUCH: All right. I'll be using the
20 summarized sunset process here. This substance, hydrogen
21 chloride, is used in cotton seed delinting, and that's
22 essential for mechanical planting for that singulation. The
23 one challenge here -- I know seed has been a topic of
24 conversation -- is the availability of organic cotton seed is
25 next to nothing domestically, so this substance generally isn't

1 ever used to delint cotton because the organic seed itself is
2 not available.

3 However, this has been on the list. It's been
4 unanimously listed in the past, and this round of the
5 subcommittee review voted to relist. A good portion of the
6 conversation about this substance has always been surrounding
7 natural alternatives, and these natural alternatives -- and we
8 also had a limited scope, TR looking at natural alternatives --
9 the leading option is mechanically delinting cotton. There is
10 a little bit of challenge with germination then, compared to a
11 chemical application, but that's the leading option. And there
12 is an operation in Texas that successfully built a commercial-
13 scale mechanical delinter, but they're waiting for industry
14 partners, so the whole chicken and the egg kind of conversation
15 with this substance, and the innovation with this substance as
16 well.

17 Commenters supported relisting, but I will note the
18 following. They did have some environmental concerns with
19 processing, but this is the only alternative currently for use
20 in organics, so they also sided to relist this product.
21 Commenters really want to see continuous improvement, they want
22 us to put this on our research priorities, and they just want
23 to do it, basically, a shout-out to alternative technologies
24 for delinting.

25 So with that, I will stop and open it up for

1 discussion.

2 CHAIR SMITH: I don't see any questions. We will
3 move to the vote. The motion to remove hydrogen chloride from
4 the National List at 205.601(n) comes before the Board out of
5 subcommittee, it was motioned by Amy and seconded by Wood.

6 And the vote starts with Mindee.

7 BOARD MEMBER JEFFERY: No.

8 BOARD MEMBER POWELL-PALM: No.

9 BOARD MEMBER HUSEMAN: No.

10 BOARD MEMBER TURNER: No.

11 CHAIR SMITH: Logan?

12 BOARD MEMBER PETREY: No.

13 BOARD MEMBER D'AMORE: No.

14 BOARD MEMBER DIMITRI: No

15 BOARD MEMBER NANDWANI: No.

16 BOARD MEMBER CALDWELL: No.

17 BOARD MEMBER JOHNSON: No.

18 SECRETARY LEWIS: No.

19 VICE CHAIR BRUCH: No.

20 BOARD MEMBER QUARCOO: No.

21 CHAIR SMITH: Chair votes no.

22 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions,
23 0 recusals, 1 absent. The motion fails.

24 CHAIR SMITH: Back to you, Logan.

25 BOARD MEMBER PETREY: Great. Okay. My turn. I just

1 want to make everybody aware that we are moving to 205.602,
2 non-synthetics prohibited, and I want to highlight here a few
3 highlights. And so going back through the wording of this, and
4 there's a typo that we find this non-compliant.

5 So ash, we do not want manure burned and use it ash
6 as an additive or soil amendment. And so there have been some
7 petitions that are looking for other uses for ash, but they've
8 all voted it down at prior boards. So also in our
9 subcommittee, we find again that it is non-compliant, and all
10 comments reflect that as well.

11 Are there any other discussions?

12 CHAIR SMITH: I don't see any, Logan. We will move
13 to the vote. The motion is to remove ash from manure burning
14 from the National List that's listed at 205.602(a). The motion
15 comes before the Board out of subcommittee, motioned by Logan
16 and seconded by Jerry.

17 And the vote starts with Nate Powell-Palm.

18 BOARD MEMBER POWELL-PALM: No.

19 BOARD MEMBER HUSEMAN: No.

20 BOARD MEMBER TURNER: No.

21 CHAIR SMITH: Logan?

22 BOARD MEMBER PETREY: No.

23 BOARD MEMBER D'AMORE: No.

24 BOARD MEMBER DIMITRI: No

25 BOARD MEMBER NANDWANI: No.

1 BOARD MEMBER CALDWELL: No.

2 BOARD MEMBER JOHNSON: No.

3 SECRETARY LEWIS: No.

4 VICE CHAIR BRUCH: No.

5 CHAIR SMITH: Franklin?

6 BOARD MEMBER QUARCOO: No.

7 CHAIR SMITH: Mindee?

8 BOARD MEMBER JEFFERY: No.

9 CHAIR SMITH: Chair votes no.

10 SECRETARY LEWIS: 0, yes, 14 no, 0 abstentions,
11 0 recusals, one absent. The motion fails.

12 CHAIR SMITH: Back to you, Logan.

13 BOARD MEMBER PETREY: Thank you. Second 602
14 material, and our last material. Mindee.

15 BOARD MEMBER JEFFERY: Thank you. 205.602, non-
16 synthetic substance prohibited for use in organic production,
17 sodium fluoroaluminate. I don't know if I'll ever say that word
18 right.

19 All comments received agree that the prohibition on
20 the National List remains relevant and this material does not
21 meet organic criteria as it is harmful to human health and the
22 environment. Organic producers have alternative materials and
23 management practices at their disposal.

24 Any questions?

25 CHAIR SMITH: I don't see any. So with that, we'll

1 move to the vote. The motion to remove sodium fluoroaluminate
2 from the National List at 205.602(g) comes before the Board out
3 of subcommittee that was motioned by Mindee and seconded by
4 Amy.

5 And the vote starts with Kim.

6 BOARD MEMBER HUSEMAN: No.

7 BOARD MEMBER TURNER: No.

8 CHAIR SMITH: Logan?

9 BOARD MEMBER PETREY: No.

10 BOARD MEMBER D'AMORE: No.

11 BOARD MEMBER DIMITRI: No

12 BOARD MEMBER NANDWANI: No.

13 BOARD MEMBER CALDWELL: No.

14 BOARD MEMBER JOHNSON: No.

15 SECRETARY LEWIS: No.

16 VICE CHAIR BRUCH: No.

17 BOARD MEMBER QUARCOO: No.

18 CHAIR SMITH: Mindee?

19 BOARD MEMBER JEFFERY: No.

20 BOARD MEMBER POWELL-PALM: No.

21 CHAIR SMITH: Chair votes no.

22 SECRETARY LEWIS: 0 yes, 14 no, 0 abstentions,
23 0 recusals, 1 absent. The motion fails.

24 CHAIR SMITH: Great job, Logan.

25 BOARD MEMBER PETREY: Thank you.

1 CHAIR SMITH: Yep, excellent work by all on Crops.

2 And with that, we are moving to lunch. We are going
3 to come back right at 2:00. I did forget, so I'm going to
4 short lunch a little bit. Sorry, y'all, but we'll be joined by
5 Amanda Moore from NRCS after lunch at two o'clock, and we want
6 to be on time for her, and then we'll continue with CACS after
7 that. Enjoy your lunch.

8 (Whereupon, at 12:48 p.m., a lunch recess was taken.)

9 CHAIR SMITH: Okay. Welcome back, everybody. Board
10 members, please take your seats. We're going to get started.

11 (Pause.)

12 Okay. Hopefully everyone had a nice lunch. We are
13 going to move into hearing from Amanda Moore from NRCS. I'm
14 going to turn it over to Dr. Tucker for the introduction.

15 DR. TUCKER: Hi, everyone. Good to see you back from
16 lunch. Before I dive into the bio here, I want to just make a
17 couple of opening comments. A couple meetings -- it was either
18 last meeting or the meeting before -- we had somebody from RMA.
19 Was that last meeting? Time flies. Two meetings ago. That's
20 right, it was in Providence. So we had somebody from RMA come.

21 As the Under Secretary mentioned yesterday, there
22 isn't currently an organic policy advisor. So we are really
23 trying to do the best we can between kind of the Under
24 Secretary level and the Program level to connect the dots,
25 particularly given all the joint goals of the Organic

1 Transition Initiative.

2 And so I think what that means is this becomes a very
3 useful forum for inviting other USDA agencies in so you can
4 learn more about kind of how to navigate that. Not everybody,
5 you know, not all agencies run like the Agricultural Marketing
6 Service and the National Organic Program. Every agency has its
7 unique culture, its unique organization, its unique structure.

8 And so having somebody from a different agency come
9 in and talk about their structure and their approach and how
10 they go about doing things helps us as a community engage with
11 them more effectively. So in the absence of a policy advisor
12 to connect the dots, this becomes a forum for connecting the
13 dots.

14 So I appreciate very much, Amanda, agreeing to join
15 us here. So thank you, Amanda.

16 And so NRCS has a lot of important touch points with
17 the Organic Program, and folks on the ground who have seen the
18 benefit of that really have very poignant stories about the
19 impact of NRCS programs on their farming practices and farms.
20 So our goal here is to, again, help sort of introduce NRCS
21 overall and how it kind of fits in with the Organic Transition
22 Initiative.

23 So let me introduce Amanda. Amanda Moore is the
24 Director of the USDA Natural Resources Conservation Service,
25 the NRCS, West National Technology Support Center. So she

1 leads an interdisciplinary team of natural resources and
2 engineering professionals that provide technical assistance and
3 training to 13 Western states.

4 Prior to joining that support center, she served in a
5 variety of technical and leadership roles with NRCS including
6 being State Resource Conservationist for Oregon -- so very
7 familiar with this setting here -- Assistant State
8 Conservationist for Management Strategy for Kentucky, and State
9 Soil Scientist for Maryland and Delaware.

10 So you really have been around. My goodness.

11 She is an Oregon native and started her career as a
12 Soil Scientist and Geographic Information System Specialist in
13 Oregon, and later, West Virginia. So Amanda, again, thank you
14 for being here and welcome. We're going to turn it over to
15 you.

16 (Pause.)

17 MS. MOORE: This is the fanciest meeting I've spoken
18 at in a really long time, so I'm just going to put that out
19 there, and also let you know that I'm a little bit nervous. So
20 thank you. But I hear you're nice people, so I'm going to hold
21 y'all to that.

22 So thank you so much, Dr. Tucker, for the invitation
23 to be here today, and Ms. Smith. We really appreciate the
24 chance to share a little bit about my agency, NRCS -- Natural
25 Resources Conservation Service -- and some of the work that we

1 do and the support that we can provide to organic producers and
2 really all producers.

3 I realized as I was kind of going through this
4 presentation, I'm going to throw a lot of NRCS jargon at you,
5 and so I'll apologize for that as well. I've worked for the
6 government for about 30 years now, and one of the things that
7 you get with that kind of career is a lot of acronyms and a lot
8 of jargon.

9 So today we're wanting to give you an overview --
10 well, you know what, before I go any further I do want to give
11 a shout out to Marina Oriel and Ben Bowell with Oregon Tilth.
12 They also have been working with NRCS via a really longstanding
13 agreement that we have to provide organic assistance, and they
14 did the good slides, and I did the bad slides. So thank you
15 guys for being here.

16 So what we wanted to do today was kind of give you an
17 overview of NRCS, our core missions and services, how we
18 operate, how folks can connect with us, and then how organic
19 production systems kind of fit into that work. So it's going
20 to be, like I said, we're going to start kind of with this
21 NRCS 101.

22 So NRCS, the Natural Resources Conservation Service,
23 provides farmers, ranchers, and other private working lands
24 owners with financial and technical assistance to help identify
25 and implement conservation practices to protect our natural

1 resources. We were born out of the Dust Bowl days of the 1930s
2 as a soil conservation service, and in the 90s we changed our
3 name to Natural Resources Conservation Service to better
4 reflect the mission that we are truly delivering of working
5 across all of our nation's natural resources.

6 We work directly with private landowners on a
7 voluntary basis to solve environmental problems on working
8 lands. We have staff present in every state and territory of
9 the U.S., and we provide service to every county and parish.
10 Our staff are science and engineering professionals, and we
11 strive to provide that science-based technical assistance and
12 advice to our customers as well.

13 So our mission is to improve the health of our
14 nation's natural resources while sustaining and enhancing the
15 productivity of American agriculture, and our vision is
16 productive working lands in harmony with a healthy environment,
17 and that feels like it would resonate really well with the
18 organic community because that's what you all do as well. So
19 we achieve this by providing that voluntary assistance --
20 technical and financial -- through strong partnerships with the
21 private landowners we work with, with land managers, and with
22 communities to protect, restore, and enhance the lands and
23 waters upon which we all depend.

24 So the foundation of the work that we do is called
25 Conservation Technical Assistance. So this is a pretty wonky

1 name for the help that our staff provide -- our federal staff
2 as well as partner staff provide -- to landowners during the
3 conservation planning process. It includes things like farm
4 visits or site visits, discussions about goals and objectives,
5 identification of the resource concerns that might be present
6 on somebody's land, developing solutions, and then figuring out
7 how to implement a conservation practice that might address
8 some of those problems.

9 It also includes the support and training that staff
10 like mine at the West Tech Center and our other national
11 technology support centers provide to our states and
12 territories to better enable our field staff to address
13 customer needs.

14 So, as I said before -- and as I was kind of going
15 through this presentation and trying to get ready my lines,
16 like I'm repeating a few things a few times, so hopefully
17 that's okay -- we work in partnership with our producers to
18 identify and solve environmental problems.

19 So when one of our planners goes out to visit a farm
20 or a ranch or a non-industrial private forest land, they're
21 assessing the condition of the soil, the water, the air, the
22 plants, the wildlife habitat, as well as potentially its energy
23 use. And if during that inventory and assessment process we
24 determine -- through visual assessment, from producer input,
25 from running some of our analysis and assessment tools -- that

1 the condition of the resource doesn't meet a baseline standard
2 that we call planning criteria, we might say that there's a
3 resource concern. And there is a definition on the screen for
4 a resource concern. It's just a degradation of the soil,
5 water, air, plant, animal, or energy resource base that can
6 negatively impact the sustainability of the resource or the
7 intended use of the resource.

8 So, for example, if we're out in the ground and we
9 notice maybe extensive drill erosion, that might indicate that
10 there is a soil condition, a degraded soil condition. So we
11 might run RUSLE2, which is one of our erosion tools, to get an
12 estimate of tons of soil loss. We might use our professional
13 judgment to say, yeah, that looks like a problem.

14 Then we'll go back and do some analysis and say,
15 okay, is the average annual soil loss based on the crop
16 rotation greater than the soil loss tolerance for the type of
17 soil? Then, yeah, we've got a problem. That's a resource
18 concern, and that matters because that's what we can treat with
19 our programs.

20 So we have six main categories of resource concerns.
21 You can see those on the screen. We break them down further
22 into 47 resource concern components because we are trying to
23 really identify what the problem is on the landscape and then
24 be able to set the stage for being able to address it.

25 So another example might be in that water resource

1 concern category. Nutrients exported to surface water is a
2 resource concern component on the water side. So if you've got
3 a resource concern, and the landowner wants to treat it, we can
4 continue on in our planning process.

5 And also what popped up on the screen there is the
6 human resource concern category, so we're not operating in just
7 the vacuum of the natural resources. The producer's goals, the
8 producer's objectives, and the producer's ability to manage,
9 you know, are they a full-time farmer? Do they have an off-
10 farm job? All of those things go into developing a solution
11 that we'll eventually work with the producer to create.

12 Yeah, so you met us, you had us out to the farm, we
13 found a problem, and you want to solve it. So the way that we
14 do that, the way that we work with folks to solve those
15 problems is called conservation planning, and that's just
16 simply the process of working with the client or stakeholders
17 to identify resource concerns and develop solutions to address
18 those concerns based on the producer's management objectives.

19 The end product of that is a conservation plan. It's
20 just a written record of the decisions that the producer is
21 making including also supporting information for the plan. And
22 we do consider these to be living documents, and they can and
23 should be updated and changed as the producer's objectives and
24 goals as well as natural resources conditions change.

25 So producers have to have a conservation plan if they

1 want to apply for financial assistance, but it's also possible
2 to work with us to obtain a conservation plan without a desire
3 for that additional financial assistance. There's lots of
4 reasons folks can come in. Certainly the primary reason is
5 probably to obtain financial assistance, but some folks just
6 need a plan to help comply with state and local regulations.
7 Some are looking for a preservation plan to help mitigate
8 health and safety concerns, maybe to protect some drinking
9 water or to help reduce wildfire risk, you know, in the Western
10 United States, or maybe to improve wildlife habitat around
11 their farm. So lots of different reasons to come in.

12 Plans can be comprehensive, so they can treat all of
13 the resource concerns and all of the land uses that a producer
14 has, or they can be progressive and developed to treat a subset
15 of the resource concerns present or a subset of the land uses
16 on the farm. And most of the time anymore we are engaging in
17 that progressive planning process, but we can continue to work
18 with our producer until they've created a comprehensive plan
19 and addressed all of the resource concerns on their property.

20 Regardless of whether we're doing a comprehensive
21 plan or resource management plan or we are doing progressive
22 planning, we follow the same iterative nine-step planning
23 process to develop a custom conservation plan to meet the
24 producer's goals and objectives while identifying the resource
25 concerns while addressing the resource concerns we identified.

1 So phase one of the process, we're working with the
2 producer to identify problems, to determine the goals and
3 objectives, and to inventory and analyze available data. In
4 phase two, we're working with that same producer to develop
5 alternatives for consideration, to evaluate the costs and
6 benefits and feasibility of those alternatives, and then
7 ultimately to select a desired path forward. And in phase
8 three we're developing designs and plans to assist the producer
9 with implementing the selected conservation practices, and
10 sometimes -- most times -- we're probably also working with
11 them on an application for financial assistance, and then
12 hopefully we get to circle back at some point and see how we
13 are all doing.

14 So conservation practices are the tools that we use
15 to treat the resource concerns that are identified on the land
16 and documented in the conservation plan, and these are just
17 land treatment techniques that are designed to conserve,
18 enhance, or protect one of our natural resources. We typically
19 use a system of conservation practices to address natural
20 resource concerns.

21 And by implementing one or more of those practices,
22 in accordance with the standards and specifications that are
23 included in the practice standard itself as well as in the
24 documentation that we provide to the producer in terms of what
25 we call implementation requirements, we have an expectation

1 that the resource condition post-treatment will meet or exceed
2 the planning criteria, which in regular speak means we have an
3 expectation that we've made progress towards solving a problem
4 and improving the base condition of a resource.

5 Our practice standards are pretty important
6 documents. They contain information about why and where a
7 practice can be applied, they set forth those minimum quality
8 criteria that have to be met so that we know that the intended
9 purpose of the practice has been achieved, and they're based on
10 research, field trials, and traditional ecological or
11 indigenous knowledge and experience.

12 Okay. So you've got a plan, we found a problem, we
13 figure out the solution. Producers at that point can decide if
14 they'd like to apply for funding to implement all or part of
15 their conservation plan, and that is called financial
16 assistance.

17 So we do have authority through the Farm Bill for a
18 number of different financial assistance programs. The one
19 that's been around the longest is EQIP, Environmental Quality
20 Assistance Program, and this is definitely one of our flagship
21 programs. It helps farmers, ranchers, forest land owners,
22 working lands owners, integrate conservation into their
23 operations by treating or improving the natural resources
24 concerns identified in the planning process, and that includes,
25 you know, regardless of the funding system. So we can help

1 treat the resource concerns experienced by organic producers
2 using many of the practices that are included in EQIP, just
3 depending upon the resource concern, the land use, and the
4 purpose of the plan and the practice.

5 Conservation Stewardship Program, that's a little bit
6 newer. This program helps producers build upon their existing
7 efforts, maybe their existing EQIP work, while strengthening
8 operations and helping them find new ways to meet their goals.
9 Through CSP, producers can work to attain a higher level of
10 stewardship -- again in accordance with their management
11 objectives -- by implementing what we call CSP enhancements.

12 I did want to flag the Regional Conservation
13 Partnership Program as well. This is our partner-driven
14 program, and our RCPP projects leverage the collective
15 resources of a partnership that's collaborating to achieve
16 common goals. And they can run the gamut from land management
17 kind of EQIP-type contracts, to more of an easement focus to
18 watershed or public works, and these proposals are solicited on
19 an annual basis.

20 So NRCS, we allocate funding for programs like EQIP
21 to states based on formulas that include factors such as
22 national priorities, natural resource concerns, the amount of
23 cropland, wildlife, or grazing land in a state, maybe statutory
24 targets, departmental and national initiatives, as well as
25 disaster preparedness. And then our states prioritize the use

1 of those program funds through their stakeholder engagement
2 process, which we'll talk about briefly in a moment.

3 Producers can then apply for the programs, and their
4 applications are evaluated through ranking tools that determine
5 what applications are going to be funded based on the ranking
6 score. And certain priorities may vary by state or maybe even
7 by areas within a state, but I just wanted to point out -- and
8 we'll emphasize this I think a couple more times -- that
9 organic and organic transitioning producers, along with all
10 farmers and ranchers, are eligible to apply for any of our
11 programs.

12 In this slide are -- because this is a great kind of
13 step-by-step how to get assistance for folks that are new to
14 the organization or new to working with us -- nine steps of
15 planning, five steps to assistance, starting again with that
16 planning process.

17 So I can't overemphasize the importance for producers
18 that want to work with us of getting to know the folks in our
19 local NRCS field office, setting up an appointment to meet with
20 them and have a discussion about their vision for their land
21 and how they want to move forward working with us. We also do
22 have a farmers.gov portal that you can sign up through and also
23 set up appointments for assistance. I will say that -- you
24 know what? I won't say that.

25 So, okay, you've got your plan, all that. Then it's

1 into that application process, the application for financial
2 assistance.

3 A couple things that I wanted to point out here that
4 we haven't talked about yet. NRCS does accept program
5 applications year-round, but we do have state-specific cutoff
6 deadlines for programs in every year, and so it's really
7 important for producers and landowners who are planning to
8 apply for assistance to understand what those state-specific
9 ranking dates are, if they want to be considered for funding in
10 a particular funding cycle. Applications that are received
11 after the ranking date get considered during the next funding
12 cycle automatically, but just kind of keeping an awareness of
13 what those funding cycles are is pretty important.

14 And another thing that's pretty important is the
15 funding is provided in a competitive process, and so you do
16 have to apply and then rank out, and then we fund starting with
17 one down through as far as we have funding.

18 In addition to the application itself, there's also
19 some requirements for folks applying for financial assistance,
20 and one of them is being in compliance with highly erodible
21 land and wetland provisions. We've got a form for that, it's
22 called the AD-1026. So that has to get filled out and
23 submitted, and then there's other eligibility certification
24 requirements.

25 The field office staff will then work with the

1 producer once we've got an application to check that
2 eligibility and make sure the producer is eligible for this
3 particular funding. That generally requires a property deed or
4 a lease agreement that shows control of the land, also a farm
5 and tract number from the USDA's Farm Service Agency.

6 Those applications get ranked according to local
7 resource concerns, conservation benefits, and other predefined
8 criteria that are available generally in advance on state
9 websites to explain what criteria are being considered in the
10 ranking process. And then if you're selected for funding, you
11 can decide whether or not you want to work with us, sign the
12 contract, get your practice standards and specifications and
13 designs, implement that work.

14 Once we've checked it out and determined that the
15 work's been done and in accordance with the standards and
16 specifications you're provided, then we can pay the contract
17 based on the -- or pay the dollar amount kind of indicated in
18 the contract.

19 So we've talked a little bit or at least referred a
20 little bit to local priorities and national priorities. You
21 know, we definitely are a locally-led organization. We kind of
22 work in both ways. We have national priorities that come from
23 the department, from our chief, and then we also have local
24 priorities that come from the ground up from the producers that
25 are there actually doing the work, up through our field offices

1 into our states. And we try really hard to both address the
2 national priorities and also make sure that we're meeting the
3 needs of the people on the ground that are closest to the
4 resource concerns.

5 It's really important to us to get feedback from the
6 producers that we serve, and so I definitely encourage you to
7 reach out as appropriate to share information about your needs
8 and about how we're operating. We definitely encourage folks
9 to engage with their local NRCS state office as well as their
10 local field office and figure out what is going to work best to
11 provide feedback in those states on priorities.

12 We have local work groups at the county and service
13 center level, and that is the forum that we use -- they
14 generally meet on an annual basis -- and that's the forum that
15 we use for formally identifying those local priorities. Then
16 we have state technical committees which are advisory to the
17 state conservationist, and those are the groups that -- they
18 tend to meet a little bit more regularly, three or four times a
19 year, and advise the state conservationist of a state on
20 program delivery priorities. So two really good groups to get
21 involved with.

22 At the national level, a lot of spending priorities
23 are set in the Farm Bill, and so definitely that's an avenue as
24 well. Farmers, stakeholders certainly can share priorities
25 with their congressional representatives.

1 And then another thing -- because I'm from the
2 Science and Technology, and we're responsible for practice
3 standards -- we have a five-year revision cycle on all of our
4 practice standards, so like the cover crop practice standard
5 340, or 590 is nutrient management. We're actually in the
6 process of revising nutrient management now. But once we
7 complete our internal copy, we submit those to the federal
8 register for review and invite public comment on the contents
9 of those standards, and so for the techie folks out there, if
10 you've got an interest in reviewing and providing comment, that
11 is welcome as well.

12 And here is how to find us. Our main website is
13 nrcs.usda.gov. We do whatever that slash is, I guess that's a
14 backslash, and add the state abbreviation, and you'll get to
15 our state office webpages and the associated contacts. You'll
16 also be able to find in the link at the top of the slide our
17 service center locator, so you can put your county in and then
18 figure out what office is the one you should reach out to for
19 our assistance.

20 So that's kind of us, that's who we are. I didn't
21 throw in an org chart, and now I'm kind of wishing I did. I
22 could throw in an org chart just to like show how we're
23 organized, but and we can talk about that if folks are curious.

24 But I wanted to move on from who we are to how we
25 kind of align with the organic programs, and so I think we

1 already talked about it a little bit. A lot of the work that
2 we do through our regular EQIP and our regular Conservation
3 Stewardship Program aligns super well with organic practices
4 and activities and support producers in being able to meet
5 organic regulations. So things like conservation buffers
6 including hedgerows, field borders, conservation cover,
7 nutrient management, the 590 standard, pest management, pest
8 management conservation systems, conservation crop rotation,
9 prescribed grazing. These are all practices that we offer in
10 our regular EQIP program, and we have enhancements under the
11 CSP program as well. They align really well with organic
12 farming activities and goals.

13 We do have a couple of specific EQIP initiatives that
14 are targeted towards organic producers or transitioning
15 producers. We have the EQIP National Organic Initiative, which
16 has been part of the last few farm bills, and does offer
17 financial and technical assistance specifically for
18 transitioning certified and exempt producers. And we have the
19 new Organic Transition Initiative, a departmental initiative --
20 well, you all know this initiative better than I do -- but
21 providing funding for producers in transition, with the goal of
22 helping to build a more resilient food supply chain.

23 So OTI does have particular requirements. You've got
24 to have either in your contract Conservation Planning Activity
25 138, which is a conservation plan supporting organic

1 transition, Design and Implementation Activity 140, which is a
2 transition to organic design, and/or an interim Conservation
3 Practice Standard 823, Organic Management. And you can have,
4 in addition to those three -- one of which is a must -- you can
5 have also any supporting practices as applicable.

6 So in terms of organic-specific funding, so anybody
7 can apply for regular EQIP, regular CSP. We do have the
8 commitment, as funding allows, towards three more years of
9 Organic Transition Initiative funding. This is a USDA
10 initiative, and funding is allocated in addition to the state
11 general EQIP.

12 And then we do sometimes provide guidance to states
13 about how to spend their regular EQIP, their regular CSP
14 initiative. And so, for example, in fiscal '24, states were
15 required to allocate some of their EQIP funding -- but not a
16 specified amount -- to the National Organic Initiative, and
17 also a minimum of \$200,000 of their CSP funds to organic. But
18 again, organic and organic transitioning producers can apply
19 for any of the relevant program funding pools in their state.

20 So what kinds of practices are we seeing folks do?
21 Under regular EQIP and EQIP Organic Initiative, high tunnel and
22 low tunnel systems, and probably associated with that the roof
23 runoff structure for collecting water. Cover crops -- always
24 popular -- mulching, and then on the irrigation side, micro-
25 irrigation, irrigation water management, and then pipeline to

1 make both of those work.

2 Looking at the Organic Transition Initiative in
3 Fiscal '24, 823 Organic Management -- and that's not
4 surprising, because it's one of the practices that would be a
5 requirement to apply for that initiative -- but then crop
6 rotation, nutrient management, pest management, cover crop, and
7 field borders.

8 Just a tiny little bit more about CPA 138 and
9 DIA 140. Those of you that have worked with NRCS for a while
10 might remember the old conservation activity plans, and these
11 are what replaced those. CPA 138, Conservation Plan Supporting
12 Organic Transition, and DIA 140, Transition to Organic, were
13 developed to help producers assess and address their resource
14 concerns as they transition from conventional to organic
15 systems.

16 But these are done a little bit differently. They
17 can be done with the help of a technical service provider
18 rather than an NRCS employee. So we would provide funding that
19 a producer can use to hire a third-party business, or a third-
20 party individual, working on behalf of the producer to develop
21 these tools.

22 It's definitely probably an area where we have a gap
23 in terms of numbers of TSPs available to deliver these
24 services, and it's something we're hoping to -- it's an area
25 we're hoping to provide some more information and training, and

1 potentially bring on more folks that are able to provide that
2 service.

3 And again, that locally-led agency where we're
4 grassroots up to our states, you know, our states are really
5 leading the way, and we wanted to highlight a couple of
6 additional agreements, additional opportunities that NRCS
7 states have implemented to help increase their capacity to
8 deliver support, technical assistance, to organic farmers, as
9 well as to conduct outreach.

10 So one example, out in New York, NRCS New York has an
11 agreement with NOFO New York -- Northeast Organic something,
12 something New York -- soil scientists remember -- to host
13 outreach events, and those have been a great success both for
14 the farmers and for NRCS personnel.

15 NOFO New York has been able to make farmers aware of
16 programs that NRCS has to offer to organic farmers, including
17 livestock farmers, vegetable farmers, fruit growers, certified
18 dairy operations. And through that partnership they've been
19 able to really help make sure that our certified organic
20 farmers in New York are aware of the great conservation
21 opportunities that are available to them.

22 Coming back here to the west side, Oregon as well as
23 other states has been hiring a handful of organic and small
24 farm specialists that can specialize in working with that
25 subset of producers, so that's exciting. And then Oregon just

1 recently entered into an agreement with Oregon Tilth to
2 establish a conservation planner position that's going to focus
3 specifically on direct technical assistance and conservation
4 planning for organic and transitioning to organic producers in
5 part of the state, as well as being able to increase outreach
6 to those producers.

7 So there's other examples around the country, but
8 those are a couple that we wanted to highlight, so
9 opportunities for organizations to engage with NRCS to provide
10 support that we need in order to reach an important community.

11 So moving on really to kind of what we're doing with
12 the Organic Transition Initiative from the technical assistance
13 side. It's pretty exciting. We have been able to add six new
14 regional organic specialist positions and a new national
15 organic research position through the Organic Transition
16 Initiative.

17 So we've had a longstanding arrangement or agreement,
18 really since 2010 with Oregon Tilth starting in the West Tech
19 Center, so we're pretty proud about that, to bring organic
20 training, resources, technical assistance to states. Over
21 time, that grew from serving just the West region to serving
22 the whole country. And historically, that's been one person.
23 For a while it was Ben, then for a while it was Marina, I don't
24 know who was before Ben, but one person, whole country.

25 So underneath OTI we've been able to expand that

1 agreement with Tilth to bring on six regional specialists, so
2 Oregon's NRCS is partnering with Oregon Tilt, who is partnering
3 with Marbleseed, Organic Agronomy Training Service, and CCLF in
4 California to bring on two specialists that will be associated
5 with the West Tech Center, two with the Central, and two with
6 the East.

7 And these folks will continue to provide organic
8 training and resources for NRCS staff, help organic and
9 transitioning producers understand the assistance we can offer,
10 coordinate alignment with top programming, facilitate community
11 building initiatives within NRCS around support for organic
12 producers, and probably lots of other things. So that's super
13 exciting to go from one person to six people kind of overnight.
14 It's pretty great.

15 We've been working also as well with Organic Farming
16 Research Foundation to support development of resources, host
17 webinars. They helped us write the new 823 Organic Management
18 Standard and supporting documentation, and we've just entered
19 into a new agreement with OFRF as well to bring on a research
20 position to continue that work, to find and share current
21 research that can inform our practices and work and then
22 complement the training efforts. So again, pretty exciting to
23 have such a substantial increase in our ability to provide
24 technical assistance and integrate science into the work that
25 we do.

1 That being said, a lot of work got done in this year
2 since, you know, underneath the existing agreement with just
3 the one person, so 72 webinars with over 6,000 participants,
4 over 190 trainings, training like 5,600 staff across 46 states.
5 And feedback is indicating that like pretty much all of those
6 participants have increased knowledge of organic systems and,
7 more importantly, had an increased ability and increased
8 confidence to actually work with the producers. So kudos to
9 that team because that's a lot of work. And so then you
10 multiply that by six and just think how much more can we do by
11 going forward?

12 So, you know, another hallmark of NRCS OTI
13 implementation is our interim practice standard 823. The
14 Organic Management Interim was developed to address resource
15 concerns on land where organic practices are used. It
16 incorporates a lot of aspects of organic regulations and takes
17 a whole systems approach, and it does require assessment of all
18 resources on the land.

19 So an interim practice, meaning that we're in the
20 process of testing it out, seeing if it works, seeing what
21 about it works, what about it doesn't. We go through a review
22 process each year, minor changes can be made. And then at the
23 end of that three-year period, we collect feedback, we evaluate
24 it, we review it, and determine whether the practice should be
25 continued or discontinued. And if it's to be continued, then

1 we make it permanently go through that federal register review
2 process, all of that, and it becomes available for use by any
3 state.

4 During the interim process, states kind of have to
5 sign up and say if they want to use it or not. This is one
6 that is much more widely adopted than some of our interims. So
7 unlike some of our practices such as cover crop, 823 is a broad
8 management practice that does include a lot of aspects of
9 organic management, and it can be contracted through EQIP or
10 the Organic Transition Initiative.

11 So some really super-preliminary highlights from
12 Fiscal '24 -- preliminary, not complete, not final, and subject
13 to change. We think we had over 230 contracts with organic
14 transitioning and exempt producers in Fiscal '24, on about
15 22,000 acres, for about \$60 million in obligated funds. And
16 from the Organic Transition Initiative, almost 100 contracts,
17 on about 14,000 acres, for about \$11 million in obligated
18 funds.

19 So what's next? The Organic Transition Initiative
20 funding is expected to continue for Fiscal '25. We encourage
21 you to reach out to your local and state office to ask about
22 application deadlines. And if you're an organization, once you
23 figure out what's going on in your state, help spread the word
24 to the producers that you're connected to. Participate in the
25 local work groups. Participate in the state technical

1 committee meetings. Just reach out and engage with your local
2 folks.

3 Whether you're signing up for EQIP or through an
4 initiative under EQIP or CSP, remember that application process
5 takes time, and I would strongly encourage folks not to wait
6 till the deadline to get started if you want to work with us
7 and apply for financial assistance. And once we get the
8 remainder of our six folks onboard providing organic technical
9 assistance, that group can definitely help make the
10 connections. They'll know the organic world, they'll know the
11 partner world, they'll know us, and they can help facilitate
12 the conversations that are needed to happen to increase folks'
13 understanding of NRCS programs and how to work with us.

14 And I think - oh, no, we've got one more. And this
15 is just a quick slide. We do have some outreach materials
16 available to support outreach to organic producers. We've got
17 a lot of materials that explain about NRCS financial and
18 technical assistance. Take a quick look at the organic page,
19 the organic trainings, and other resources available that
20 describe the alignment between our programs and our organic
21 systems. We are in the process of updating an organic programs
22 at a glance resource that also talks about USDA programs and
23 how those connect to organic and other producers.

24 And then just lastly, if you don't remember anything
25 else, we do have the EQIP Organic Initiative, we have Organic

1 Transition Initiative, they're important resources that target
2 organic producers and organic transitioning producers, that all
3 of our programs are available to all producers, and
4 conservation -- writ large -- aligns well with organic
5 production systems. So just encourage folks to look us up on
6 the website. Go visit your local service center, and I guess
7 ask your conservation planner how you too can get a
8 conservation plan.

9 I guess with that, we'll elegantly end this
10 conversation and see if there are any questions.

11 Oh, before we go to questions, there's some contact
12 info on the slide. Lindsay Haines is our NRCS National Pest
13 Management and Organic Systems Specialist, so her contact is
14 there. Anything techie, that's Lindsay. And then Marina
15 Oriel's contact information is listed as well for questions
16 about partnerships and how to go about developing a partnership
17 or maybe entering into those conversations with your local and
18 state NRCS leadership.

19 So that really is it. And I guess with that, I'll
20 stop talking and see what questions there are.

21 (Applause.)

22 CHAIR SMITH: Thank you so much. You did a great
23 job. Lots of useful information.

24 I'm actually going to turn it over to Amy. She's
25 Vice Chair, Amanda, and she's going to facilitate questions

1 from Board members.

2 VICE CHAIR BRUCH: Thank you, Kyla.

3 Amanda, thank you so much for being here today and
4 sharing with us your increased focus on organics. So I'm going
5 to open it up to questions.

6 Yes, Dilip, and Allison.

7 BOARD MEMBER QUARCOO: Thank you for your excellent
8 presentation, and as Amy said, this is a lot of good
9 information in general on NRCS and a lot of different programs.

10 I'm also part of TOPP, and a lot of stakeholders,
11 they've been asking this question that this is for five years,
12 as we all know, and two years are almost, you know, we have
13 complete. And also, Climate-Smart, your NRCS program, CSAF,
14 I'm also part of that too.

15 So in those two programs, these stakeholders, I mean
16 the producers, they also ask this question that we are now in
17 almost second year joining, let's say, for certification. Once
18 they start transitioning, we all know that it's 36 months, so
19 three years is the period they have to wait. So and this is
20 almost end of the second year, and then three years they go for
21 certification. That brings to the almost end of this program
22 or these projects. So the question sometimes, you know, a few
23 of them they ask that would these programs will be available
24 beyond 2027, because currently they are set to expire sometime
25 in October 2027. So any thoughts, any comments, anything you

1 want to provide, info that there might be assistance available
2 for the producers beyond that time period? Thank you again.

3 MS. MOORE: No, thank you. Yeah, so our programs,
4 our financial assistance programs particularly, are authorized
5 through the Farm Bill. Most of the time we do have other
6 programs like the Inflation Reduction Act funding. That's kind
7 of to the Climate-Smart ag and forestry practices that was
8 authorized through different legislation but, you know, so that
9 one definitely has an end date on it at the moment, or as best
10 I know at the moment.

11 But our flagship programs have been around a long
12 time, so I would say that even if, say, the Organic Transition
13 Initiative ends or when the IRA legislation ends, we still have
14 EQIP, we still have CSP, we still have RCPP. So we still have
15 opportunities for producers to work with us to continue to
16 address the problems that they want to solve. So, you know,
17 and then you never know what other new programs might show up
18 in the meanwhile.

19 VICE CHAIR BRUCH: Thank you.

20 BOARD MEMBER QUARCOO: Just very quick. The Farm
21 Bill as we all know that it's -- you know, we know it's going
22 to be extended another one year or so. You think that this
23 funding, these programs going to be part of that Farm Bill in
24 case it is extended for one year or for next five years so that
25 there will be hope that these assistance will be available like

1 other programs EQIP and several other programs NRCS offers?

2 MS. MOORE: I don't want to speculate exactly on
3 what's going to be in the Farm Bill once it finally passes.
4 But we do have, through the IRA legislation, authority to
5 continue operating EQIP and CSP, and like I said, there will be
6 some kind of conservation program available to assist.

7 BOARD MEMBER QUARCOO: With this, I'd like to thank
8 you, you know, NRCS, because I've been part of NRCS almost
9 20 years. A lot of these programs and funding are available,
10 and really appreciate the producers and all the stakeholders,
11 the very good, excellent program you have, and through that
12 they have been really benefited, whether organic and
13 transitional. So thank you again for your nice presentation.

14 VICE CHAIR BRUCH: Thank you, Dilip.

15 We'll go to Allison.

16 BOARD MEMBER JOHNSON: Thank you so much, Amanda.
17 This was a really helpful overview. And I'm wondering if we
18 can go back to the how to get involved slide and have you walk
19 us through it with a couple of specific examples. The first
20 would be, you know, we've heard that the appetite for promoting
21 organic or supporting organic producers in different states is
22 pretty variable. So if I was a producer in a state that hadn't
23 been very proactive on organic, how would I use these different
24 levers for getting involved to voice my interest in seeing more
25 support for organic?

1 And then one more specific example, if we wanted to
2 have like an interim practice around sourcing organic seed,
3 same question. How would we use these levers to start that
4 process?

5 MS. MOORE: Sure. And so, definitely, states do have
6 their local and then state priorities in the context of the
7 national priorities. Local work groups -- so I guess it's
8 like, you know, it's all about relationship building, right?
9 So getting to know the folks in the local office. If you're a
10 producer, getting to know the DC and SoilCon and maybe even the
11 Conservation District staff, finding out when the local work
12 group meetings are, and attending those and expressing what
13 your considerations might be or what you'd like to see
14 happening.

15 I said again, you know, if it's particularly for an
16 organization, the state technical committee meeting might be a
17 good place to interface. Organizations also interface with the
18 local work groups as well, and often do, especially if you have
19 a statewide organization. The state technical committee
20 meeting, which again meets three or four times a year, is a
21 good place to go. Those are all advertised in various ways,
22 through a website, through a news release, so keeping your eyes
23 open.

24 But I think it's building those relationships, so
25 getting to meet the assistant state conservationists for

1 programs and having a discussion, or getting to meet the state
2 conservationist and having those discussions and putting those
3 ideas on their radar. But those local relationships are super
4 important, so getting started with that relationship building,
5 I think, is probably the place to start.

6 I feel a lot more confident speaking to your second
7 question because I was an SRC and I've never been a state
8 conservationist. So that, I would say, reach out to your state
9 resource conservationist or to your state agronomist for a
10 practice like sourcing seed, and just start those
11 conversations. Interim practices are generally required to be
12 initiated by a state, so you need a state that is interested.
13 Then you have to build a draft standard, and then associate
14 payment schedules that can be implemented and tested. So that,
15 you know, reaching out.

16 And if you need help connecting to the appropriate
17 people, to the agronomist, to the state resource
18 conservationist, your local folks can probably help make those
19 connections. Alternatively, somebody probably could reach to
20 the national discipline lead, the national agronomist, and
21 maybe start that conversation at that level. But ultimately,
22 we do need a state to take an interest and be willing to
23 sponsor the interim.

24 BOARD MEMBER JOHNSON: That's really helpful. Thank
25 you.

1 VICE CHAIR BRUCH: Thank you, Allison.

2 Let's go to Nate.

3 SECRETARY LEWIS: Thank you so much. My question is
4 about small farms and small farmers engaging with NRCS. Is
5 there any appetite or energy at NRCS to add some flexibility to
6 programs, because a number of the structure of the programs are
7 just hard and fast barriers for access to those programs. So
8 I'm curious what the thinking is about trying to help folks
9 overcome those barriers.

10 MS. MOORE: Sure. So we've definitely been putting a
11 lot of effort recently in reaching new customers, and that
12 includes small farms, and urban farms, and things like that.
13 We don't have -- we don't put those folks in a box, but we do
14 recognize that they have different needs, and particularly when
15 it comes to implementation requirements and the design, and
16 then maybe how we pay for things.

17 We have been putting a lot of effort recently into
18 developing what we call payment scenarios, which is -- I saved
19 you all from having to learn about what those were, but let's
20 just pretend we talked about it. We're developing payment
21 scenarios that are more reflective of the cost of doing
22 business on a small scale operation. So we might have, for a
23 seeding practice, the costing the components based on pounds
24 rather than bushels.

25 So that's a lot of what we've been doing is trying to

1 figure out how to better reflect how a practice is implemented
2 on a small farm so that we can account for that in both the
3 design and then in the payment schedule. But the planning
4 process, all of that is pretty consistent regardless of the
5 size of the farm or whether it's rural or urban.

6 I guess another thing that we're doing, we do have a
7 raised bed interim practice, and that is probably particularly
8 well-suited to small farms. High tunnels and low tunnels are
9 also probably particularly well-suited to small farms as well.

10 SECRETARY LEWIS: Thank you so much.

11 VICE CHAIR BRUCH: Thanks, Nate.

12 We'll go to Kyla.

13 CHAIR SMITH: Hi. You mentioned the positions that
14 are as a result of OTI, so the six regional positions and then
15 the research positions. Am I understanding correctly that
16 those are yet to be filled?

17 MS. MOORE: We are in the progress of getting them
18 filled, and I actually am going to ask Marina if you're okay to
19 maybe give an update on the status. And also, can you
20 introduce Christina, because I totally spaced that she's here.

21 MS. ORIEL: Sure. Yeah. So we are actively hiring
22 and filling those positions now. We do have four of them
23 already onboard with us, and Christina is here, one of those
24 regional specialists for the West region, Christina Peterson.
25 And we have two more folks coming onboard to complete our team

1 of six, and if anyone is interested in connecting with one of
2 those folks, I'm happy to make that connection and share their
3 contact information if you reach out to me.

4 BOARD MEMBER JEFFERY: Does Christina mind raising
5 their hand? Welcome. Hello. Thank you.

6 VICE CHAIR BRUCH: Wonderful.

7 Nate, go ahead.

8 BOARD MEMBER POWELL-PALM: I just wanted to thank you
9 for joining us today. This has been something we've been
10 talking about as a board for a really long time, this
11 relationship between NRCS and trying to just get to know each
12 other better. I also really appreciate your statement that
13 conservation, writ large, aligns with organic. I think that's
14 something that we all really believe, and we're hoping to
15 spread the word and get it out there. So appreciate you being
16 here today.

17 MS. MOORE: Well, thanks for the opportunity.

18 VICE CHAIR BRUCH: Brian, go ahead.

19 BOARD MEMBER CALDWELL: Yeah. Thanks so much. I
20 wanted to kind of add on to Allison's question that I'm really
21 curious about the local work groups, and is that something that
22 an individual farmer could get involved in, and what do they do
23 exactly? I'm obviously totally ignorant, so appreciate that.

24 MS. MOORE: Yeah, so the local work groups are
25 something that individual producers can get involved with. I

1 would say different states probably handle them a little bit
2 differently. In Oregon, one of the ways that -- I mean, in
3 Oregon, for example, those groups are really used to set their
4 county priorities, so to concur on what the primary and
5 important resource concerns are in a county, and then on which
6 of those resource concerns and which of potentially some
7 proposed projects might become the priority for a particular
8 fiscal year.

9 Other states are going to operate a little bit
10 differently, and so again, just kind of like reaching out and
11 making the connection with the local district conservationist
12 to see how they're using their work group to get feedback, and
13 make sure you're on the invite list when it goes out. So yeah,
14 again, like with all of our work, a little bit of a local
15 flavor.

16 BOARD MEMBER CALDWELL: Okay. Thank you.

17 VICE CHAIR BRUCH: Are there any other questions?
18 Otherwise, I have one, of course. Okay.

19 Oh, go ahead, Allison. That's fine.

20 BOARD MEMBER JOHNSON: Just could you put a finer
21 point on why the priorities matter? I think it's because
22 that's where the money goes, but could you say more about that?

23 MS. MOORE: Yeah. I mean I think we only have so
24 many -- so much funds available, and we have a lot of --
25 there's a lot of work that can be done, and so the state and

1 local priorities are how we prioritize the use of our funds
2 most of the time -- well, state, local, and national
3 priorities, so it all works together.

4 VICE CHAIR BRUCH: Okay. Amanda, thank you so much.
5 Actually a few moons ago, it's been quite a few, I actually
6 interned with the NRCS. So it was really great to hear about
7 everything that's going on in the NRCS and also just to learn
8 how aligned we are. You mentioned the systems of conservation
9 practices to address resource constraints, and that's exactly
10 what we do as farmers with a system-based approach to solve our
11 challenges with production and organic farming. So thank you.

12 Question is on 823. I feel like this is one of the
13 most impactful opportunities for transitioning producers to
14 take advantage of, and I know it's been in its second round.
15 We have heard in the previous public comment process that it
16 was a little bit of a struggle for the farmers that wanted to
17 engage in that practice to actually being able to be accepted,
18 just I think with knowledge transfer. But I was going to say,
19 if there's a time limit on this, what in the organic community
20 do we need to do to provide evidence to make sure this program
21 stays for many, many, many years to come? What can we all do?

22 MS. MOORE: So I would, you know, so again, it's an
23 interim practice being trialed by states, and I would say
24 probably the best avenue is for producers that are, you know,
25 because when we're trying an interim practice, we're testing

1 whether it works or not. Is it written correctly? Are the
2 criteria right? Is it actually working?

3 And so I would say maybe the producers that are
4 actually implementing the practice, making sure that their
5 feedback gets to their local office, and then it gets to the
6 state specialist, probably the agronomist, who's responsible
7 for managing the interim practice, and then that gets recorded
8 into the system with feedback provided back to headquarters so
9 that our national discipline lead has that for consideration as
10 they're evaluating.

11 And then I think probably, again, the same
12 communication pathways, you know, making sure that the feedback
13 related to the use and intent of the practice is provided to
14 the local office, to your state office, as appropriate is
15 probably the best. And I am going to see if there's any other
16 thoughts over on the other side of the room, or did that kind
17 of capture what we can or should do?

18 MR. BOWELL: Yeah, I think that's right. And I just
19 want to say I think that it's a different type of practice, a
20 systems type of practice, and there has been a little bit of
21 lag to get staff trained up for it. And so I sort of am
22 appreciating the interim phase of it so that there's more
23 opportunity for staff to learn about it and to provide that
24 feedback so that we make it a really effective practice that
25 staff are going to want to contract in the future. And so I

1 think that this interim stage is really valuable, and I'm also
2 not sort of in a rush to get right out of it, I guess, as
3 there's still a lot of learning going on around it.

4 VICE CHAIR BRUCH: Sure, that's wonderful. Well,
5 thank you. We'll hope to stay really in close contact then
6 over the next three years, the organic community and NRCS,
7 especially on 823 and all the other wonderful things you do.
8 So thank you so much, Amanda, for your time. Really appreciate
9 it.

10 CHAIR SMITH: Okay. Can we give Amanda another round
11 of applause?

12 (Applause.)

13 CHAIR SMITH: Thanks so much for being with us. It
14 really is important to, as you said, create these
15 relationships, and so thanks for joining our organic family.

16 With that, we are going to move into the CACS
17 Subcommittee deliberations, and I'm going to turn it over to
18 Amy Bruch who is the chair of that subcommittee.

19 VICE CHAIR BRUCH: Okay. We're going to get started
20 here, and thank you for your time today. CACS is the last
21 thing on the agenda. We have four topics, so I'm excited to
22 spend the afternoon with everybody.

23 What we're going to do for time management, we have
24 one proposal and three discussion documents, so we're going to
25 start off with a proposal, then we'll take a break, and then

1 we'll tackle the three discussion documents after that.

2 Before we begin, though, just a quick intro, and also
3 an appreciation and thanks. I was going to say thank you to
4 Nate Powell-Palm, but he is not here. So I'm going to say
5 thank you to Kim, thank you to Jerry. And also Mindee, you've
6 had some rotations in CACS, our super seniors. Thank you so
7 much for all the contributions that you provided. Wood,
8 there's still time to join a few subcommittee meetings. You're
9 the only super senior that hasn't participated. Well, open
10 invitation.

11 But anyway, thank you to the super seniors, and thank
12 you so much to this committee. We have, I would say, a
13 collection of very diverse backgrounds, perspectives, and it's
14 really been helpful to stress test the work agenda items that
15 we present to the community. So I really appreciate what has
16 happened in the subcommittee.

17 I also prepared one quick slide to reflect on the
18 last four years that I've been on the Board, and this was kind
19 of just a nod to Under Secretary Moffitt to look backwards, to
20 appreciate where we've been, and to look forwards to where
21 we're going.

22 So going on to the next slide, we'll see we have
23 accomplished a lot. I was a subcommittee member my first year,
24 and the Chair -- I've been honored to be the Chair of CACS for
25 the past three years. And these are the proposals that we have

1 passed and offered up recommendations to the Program.

2 So we've done three in Human Capital, Management
3 Strategy for Recruitment and Talent Management. We did NOSB
4 Technical Support, which actually is in execution currently,
5 and we've transitioned review of that to another subcommittee,
6 PDS, what Nate just mentioned earlier. We have Opportunities
7 in Organic, Improving Support for Organic Transition, and that
8 was one of the driving forces for the NRCS conversation. Thank
9 you, Allison, for spearheading that, and that conversation
10 exchange with Amanda was very beneficial.

11 We've done two in Climate Change proposals.
12 Originally, Carolyn led the charge really early on in her
13 tenure in CACS with a letter to Secretary Vilsack to say
14 organic is climate smart. We needed to be a part of that
15 conversation, and there was an encore document entitled Organic
16 is Climate Smart, where we referenced all the regulation to
17 prove that we are climate smart, and that was led by Nate.

18 Then we have Oversight and Enforcement. So we had
19 three proposals that we brought forward, and some are already
20 in action by the NOP currently. We had the NOP Risk Mitigation
21 Table Review, the Oversight Improvements to Deter Fraud, and
22 that was Acreage Reporting on Certificates, and you can see
23 that in the OID currently, so thank you so much for that. And
24 then we had Consistent Location Information, and that's really
25 important when we're doing the process-based investigations.

1 The start of some of these investigations really occur on the
2 farm, and we need to know where that farm is.

3 So I was really thankful for all the progress we
4 made, but as we all know, we've got to roll up our sleeves and
5 still keep working. I love the agenda topics that, not only
6 this committee has, but the full Board has this year. It's an
7 impressive lineup, and I'm just honored to serve with
8 everybody.

9 In addition to the proposals that we've passed, we
10 have had a few discussion documents that we didn't take to
11 proposal, and that's just a good exchange with the community to
12 see and reorganize our priorities. We've also had a number of
13 speakers attend our subcommittee meetings to inform our work
14 agenda items -- and not only our subcommittees but also the
15 full Board meeting -- and we already mentioned Francie Tolli
16 (ph) with the Risk Management Agency, she attended our board
17 meeting a year ago. Amanda currently. We've also had
18 Lindsay Haines with NRCS. She's informed some of our work in
19 the past in subcommittee. We've had several members from the
20 NOP Oversight and Enforcement team to inform our work agenda
21 items relating to integrity. And we've also had, it was a year
22 ago, a speaker on equity and racial justice in organic
23 transition.

24 So not only are we working hard with our work agenda
25 items, we're also trying to interact and get informed in the

1 subcommittee. We do not have sunsets, we don't have technical
2 reviews, but we're trying to get the information we need to
3 provide the best recommendations to the Board. So I guess one
4 other thing I want to mention, we also changed our meeting
5 format from one meeting a month to two so we could tackle
6 everything that we present in front of you. We did that
7 several years ago, and it's been highly beneficial.

8 So let's dive in. We're going to start with Climate-
9 Induced Farming Risk and Crop Insurance proposal. Really
10 appreciate stakeholders --

11 BOARD MEMBER JEFFERY: I just, I'm sorry, I just
12 wanted to say that you -- if people know basketball -- you are
13 the mamba mentality of this board, and I just wanted to say
14 thank you and let people know that if you're on Amy's team
15 you're going to have a better work ethic.

16 VICE CHAIR BRUCH: Well, thanks for that, Mindee.
17 Total team effort. It's an incredible team that we have.
18 We've grown over the years. It was a very small subcommittee,
19 and now it's a large one, and really appreciate everybody's
20 contributions. And really appreciate, also, collaboration with
21 the Program to accelerate some of the work agenda items that
22 we're bringing forward to everybody.

23 All right. Anything else? Sorry, Mindee, I didn't
24 mean to miss you, but thank you.

25 All right. Let's go to Climate-Induced Farming Risk

1 and Crop Insurance. As with prior presentations,
2 unfortunately, a lot of these pictures are real, and they are
3 from members of the Board or from members of the community.
4 Logan actually had this picture in her background, and this was
5 from the most recent hurricane experiences down in Florida.

6 BOARD MEMBER POWELL-PALM: Amy, would you mind
7 explaining what that photo is? I feel like for those not in
8 pivot country.

9 VICE CHAIR BRUCH: Okay, yeah. Thank you, Nate.
10 Sorry, I take these for granted. We're 100 percent irrigation
11 on our operation. This is center pivot, and it really is a
12 tinker toy in any type of wind. So as you see there, it just
13 turned over, and unfortunately we have to put those back up,
14 and they're very expensive. And Logan had

15 -- how many, Logan, did you have knocked down on your
16 farm?

17 BOARD MEMBER PETREY: 26.

18 VICE CHAIR BRUCH: 26. And was there a crop
19 underneath those pivots currently?

20 BOARD MEMBER PETREY: Yes, so we had our fall veg
21 program and our carrots, and we ran out of time, so we don't
22 have a season either.

23 VICE CHAIR BRUCH: Sorry to hear that. And that is
24 why we brought forward this conversation. We need equitable
25 solutions for organic and transition producers that are farming

1 in the face of these real weather moments.

2 Crop insurance in general, the conversation has
3 really been a great collaboration and experience. It's a great
4 example when our diverse community can coalesce around subject
5 matter and make a real difference for organic and transition
6 producers, so I'm really proud and thankful for that
7 opportunity to have this discussion. This proposal intersects
8 with producers who are impacted by climate change experiences,
9 and also -- on a positive note -- investments in
10 the top program to get more transition *Gaine McRobee* to organic.

11 Primary mechanism for climatic risk supports
12 involvement in improving the existing crop insurance policy
13 tools offered to organic producers, and this slide is a
14 wonderful highlight of the progress that we've made. There has
15 been a final rule, it was just recently published, and that's
16 on expanding options for specialty and organic growers.

17 There's three things that are highlighted there on
18 the slide that that rule implemented. One of them in
19 particular is something that we've heard from farmers several
20 times in public comments is about enterprise units by organic
21 farming practice, so farmers can separate out their
22 conventional acres if they're split production from their
23 organic acres and get really specific types of insurance for
24 those different practices.

25 Also, the updated good farming practices definitions

1 that's something in collaboration with the NRCS, RMA, and the
2 Organic Program. It's really come to fruition. That practice
3 up above is on my farm. It's an example of a roller crimper
4 rye with soybeans, implementation of reduced tillage, no-
5 tillage type operation for the season. And originally, that
6 was not an approved practice. I'm thankful that it is an
7 approved practice for insurance right now, so that's progress
8 being made. And then we have double cropping and annual forage
9 as well, so opportunities in certain areas to plant two seasons
10 of crop in one year -- that's wonderful -- and get insurance
11 coverage.

12 Other notable improvements that we've talked about
13 that have been progress made is the contract price addendum,
14 and the RMA allows enterprise units for specially and perennial
15 crops. And that's just not on grains. A lot of what we're
16 talking about here -- there's some pictures of grains, some
17 pictures of produce -- a lot of these things are really
18 important for all crops. And that was another conversation
19 that we had at the last meeting about the applicability of the
20 recommendations here and who do they apply to. So what the
21 Board has really been focused on is looking at options that are
22 built for both grain farmers and produce farmers.

23 Continuous improvement, though, is still needed. And
24 this picture is a vegetable farm post-hail storm. And I
25 believe this was in Montana. Is that correct? Montana. So

1 there's still a list, and that's what the community has
2 coalesced around. The top issues that matter to close the gap
3 between options that are available for conventional producers
4 that organic and transition producers also want to have access
5 to.

6 So this list is essentially helping to close the gap.
7 And the updated loss adjusting manual for quality
8 considerations and infield adjusting speed are two really
9 critical items to try to improve, and again, those are mutually
10 beneficial for grain and produce.

11 T-yields, and that is the coverage level that farmers
12 are able to insure on their farms. That's really important
13 that that is not a disincentive for transition producers to
14 decide if they want to continue. Right now we've heard through
15 public comment process, transition yields and organic yields
16 are automatically set approximately 65 percent of the value of
17 a conventional producer. So even if you have all the
18 experience in the world as you transition, you get quite a
19 haircut in insurance level coverage currently. So that's an
20 area that's really bubbled up to the top. We have multiple
21 solutions that we've highlighted for RMA that we've received
22 public feedback on, and I'm excited to present those post-
23 proposal approval.

24 And the other one is organic agent finder. As an
25 organic producer, my agent actually lives in North Carolina. I

1 needed to find a specialist that could help me out with the ins
2 and outs of the program offered currently for organic
3 producers, and I was able to find one, and we've had a great
4 relationship there. But the idea is that maybe your local
5 office doesn't have the skill sets, so we need to connect those
6 that have the knowledge with those that want the knowledge.
7 And then just making sure insurance works for all.

8 That's the top items that really bubbled up with the
9 community and stakeholder feedback that we've received. We do
10 have additional challenges that we've summarized in the
11 discussion document that they're presented here and also in the
12 meeting materials. There's still more work to be done,
13 obviously, and we wanted to make sure we had a succinct list
14 for Risk Management Agency to help make additional progress on.

15 And we did include the note. Even though chemical
16 drift is not in the jurisdiction of the Risk Management Agency,
17 they're looking at weather events. From that community
18 perspective, it is a really important part of risk management.
19 Right now, some of the chemicals that drift on fields, we are
20 not able to identify the point of source. So there needs to be
21 some type of uninsured, quote-unquote, motorist policy that can
22 protect organic producers from unknown points of source drift
23 events, and that could be, for example, dicamba.

24 So that's the introduction to the proposal that's in
25 front of you, a summary of the comments and feedback that we've

1 received. The community is resounding in support of this
2 document. The list resembles many of the things that other
3 farming working groups have on their short list. So it was a
4 really collaborative effort amongst the community and the Board
5 to generate this list to present to Risk Management Agency.

6 So with that, I'll open it up to comments, questions,
7 or anything else.

8 Nate, go ahead.

9 BOARD MEMBER POWELL-PALM: As I listen to the cadence
10 that you present this material, I just think of like this to-do
11 list, that mama says get out there, get it done, and get back
12 for dinner. And I really want to just take a minute, if we
13 could go back a few slides, and just talk for a sec.

14 There are a few chances, I think, in this life to do
15 real, tangible good, and I think as we look to your work, Amy,
16 in this space, you've looked around and said what makes farmers
17 heal? As you look to this picture, this is when a farmer is at
18 its lowest. This is my neighbor. This is when they're
19 deciding are their kids going to farm? This is when they're
20 deciding are their employees going to get paid? And you, as
21 Chair of CACS asked, how can we be useful? How can we serve
22 our people? And I think it is just so reflective of all of the
23 priorities, all of the pain we've heard out in the community.

24 So I just want to thank you for being so steady and
25 willing to listen to how can we actually help our community.

1 And I think this really reflects an opportunity that I so
2 appreciate you giving me, to be out there with folks thinking
3 about transition, and me being able to tell them there are
4 problems, this is where we've made progress, and we've got this
5 group called the NOSB that's ready to hear them, and we're
6 going to do our best to at least act as a sounding board. So
7 thank you.

8 VICE CHAIR BRUCH: Absolutely. Thank you, Nate. And
9 I agree with that. It's a punch list, and I think we can get
10 this stuff done in pretty short order. That's at least the
11 message that we'll send. I wanted to turn it back to you,
12 though. On this picture, do you want to highlight what the
13 producer had to do because insurance options weren't available?

14 BOARD MEMBER POWELL-PALM: Yeah. So this producer is
15 really well-known, I would describe him as semi-famous in our
16 community that they produce a ton of excellent vegetables, goat
17 cheese, a lot of food that our community eats. They weren't
18 participants in crop insurance, and so when this happened, it
19 was in June, mid-season of last year, and they lost everything.

20 And the patriarch had recently died, they were
21 already grieving, they had this happen, and they had to resort
22 to a GoFundMe page. And I so appreciate that our community
23 stepped up and tried to make them whole as best they could, but
24 I really want to live in a world where we don't have to do
25 that. And that's, I think, the goal with this insurance, how

1 we get everyone the right risk mitigation to make it so that
2 we're safe in pursuing this.

3 The other thing about this picture is we talk a lot
4 about how climate resilience is baked into the farming
5 practices that we execute in organic, and I do believe that's
6 true. But I think that there's a difference between minor
7 drought resilience, if you're getting one inch less rain than
8 maybe you expected, versus a catastrophic golf ball-sized hail
9 coming down. There's no way you're going to resilience your
10 way out of that, except for a good coverage policy so that you
11 can pick up and keep on going.

12 And I'm really grateful that these folks are, but I'm
13 really grateful that we are moving towards a world where
14 they're going to have good insurance options that make it
15 possible, that they don't have to hope that a once-in-a-
16 generation GoFundMe works to save the farm.

17 VICE CHAIR BRUCH: Thank you, Nate.

18 Carolyn, I also wanted to recognize your work.
19 You're the one that kick-started this conversation up, and you
20 provided very substantial foundational information and research
21 information. And that's found in the first discussion document
22 on this topic, and that's a really important work to reference,
23 because there's an incredible amount of statistics and
24 background information. Is there anything else you'd like to
25 add? Okay. But thank you for starting this conversation and

1 the actual hard data to quantify the experiences that organic
2 producers were going through.

3 Jerry, did I see your hand? Okay.

4 Oh, Wood, go ahead.

5 BOARD MEMBER D'AMORE: Amy, I'm wondering, so the
6 amount of education that you've done for us in sort of
7 understanding this issue has been substantial, and I really
8 appreciate it.

9 I'm just curious if you -- what is the tangible --
10 like what do you - when I look at the opportunities for
11 improvement slide it's exciting, I think. What is the tangible
12 action that you really are hoping is going to happen here? If
13 we came back five years from now -- the five years I've been on
14 the Board, five years from now -- what am I going to see
15 differently if what you've put forward here catches fire?

16 I guess I'm just trying to make it really tangible
17 because I sort of think about all the issues. Like is it
18 access to policies? Is it availability of underwriters? Is it
19 general, simple farm-level economics where people just can't
20 buy policies. Like what, at the end of the day, like what are
21 we going to see differently because of this work?

22 VICE CHAIR BRUCH: Yeah, that's a great question,
23 because I always think we've got to look at it from a macro
24 view. Currently, for family farms, we need to do whatever we
25 can to keep our farm going for the next generation. Deciding

1 to transition to organic, to me, was a tough one because of the
2 available risk management strategies that are currently
3 offered.

4 My husband and I, we farmed in Brazil for quite a
5 while without any opportunity for crop insurance access, and I
6 compared transitioning to organic very similar to farming in
7 Brazil. Without a safety net, you can roll the dice, and you
8 might not have another year to do what you love because it is
9 that serious, without crop insurance, you wouldn't be able to
10 recoup the investment that you put in for that current crop.

11 So the idea with improving crop insurance
12 opportunities is that family farms have the opportunity to
13 continue their legacy. There isn't a second thought for
14 producers to transition to organic because risk management
15 opportunity, or risk management plans are very similar to
16 conventional. I think right now there's quite a delta in the
17 coverage levels for conventional that it is truly a big barrier
18 that isn't always communicated in conversations about why are
19 farmers not transitioning to organic. At the end of the day,
20 there's many things that are helpful, but having an insurance
21 policy that can recoup your investment into a crop is top three
22 for sure, if not top one.

23 So that's what I see. Retention, recruitment, and
24 many items on this list, I believe all of the items on this
25 list, are in the regulatory jurisdiction, so we do not need a

1 farm bill to make some of these changes. So I'm really hopeful
2 -- we've seen a lot of progress made so far -- I'm really
3 hopeful we can, like Nate said, cross these things off the list
4 and get ready for the next list. So thank you for the
5 question.

6 Go ahead, Nate.

7 SECRETARY LEWIS: Yeah, that's a great question,
8 Wood, and this sort of resurrected a memory I've probably
9 stuffed down where I did a lot of advocacy work on crop
10 insurance for organic producers. And I think one of the
11 challenges we faced was that we were showing up in offices with
12 one farmer's problems -- which are great to resolve, but they
13 don't represent organic as a whole -- and we often heard, you
14 all go figure out what you need, and agree on it, and then come
15 back to us and we'll work on that.

16 And I think this is a good step in that direction
17 where we really function like a clearinghouse to get the
18 information, all agree on the issues, and then advocacy groups
19 can point to this recommendation as they're going to resolve
20 regional problems, national problems, developing programs,
21 working with their congressional representatives to fund
22 certain things or put pressure in certain areas. So I think
23 tangibly it will function really -- it'll be really helpful to
24 those advocacy efforts.

25 VICE CHAIR BRUCH: Thanks for your additions, Nate.

1 Carolyn, I saw your hand. Go ahead.

2 BOARD MEMBER DIMITRI: Yeah. I guess I think I'm
3 going to be much more simple in this explanation. Like crop
4 insurance has been around for a very long time. Organic
5 farmers couldn't get it. The Farm Bill said, hey, RMA, organic
6 farmers deserve it, and then RMA has sort of like tried to
7 adapt a program that was designed for non-organic farmers to
8 make it work for organic farmers.

9 And so the goal here is to try to make the policies
10 better for organic farmers, but I also hope that RMA takes a
11 step back and says -- like instead of doing these fine-tuned
12 adaptations to these existing programs, that maybe they will
13 kind of take some of these suggestions and say, oh, maybe we
14 need to think about insuring organic farms in a different way
15 or a way that works better for them. So I guess to me, that's
16 the very simple answer to the question.

17 VICE CHAIR BRUCH: Thanks, Carolyn. I would agree
18 with that. And that's, I think, one attestment to updating the
19 last adjusting manual and have a specific section for organic
20 production, exactly what you said. Thank you.

21 Okay. Any more discussion, questions? Had some
22 supplemental information just in case there was more questions
23 on T-yields. Okay. Yep. There we go.

24 CHAIR SMITH: Okay. I think we're ready to vote. So
25 there is a motion to the full Board to accept the Climate-

1 Induced -- (coughs).

2 Sorry, can you finish?

3 VICE CHAIR BRUCH: All right. There's a motion to
4 accept the Climate-Induced Farming Risk and Crop Insurance
5 Proposal. It was motioned by Amy Bruch, it was seconded by
6 Nate Powell-Palm. And let's see. I can't tell, Andrea, the
7 number of yeses. Okay.

8 BOARD MEMBER DIMITRI: Hey, Amy. I'm sorry. Can I
9 ask one question before we vote?

10 VICE CHAIR BRUCH: Oh, absolutely.

11 BOARD MEMBER DIMITRI: So what actually are we doing
12 with this document? Say we pass it, like what's the next step?
13 Maybe you said it, and I just don't remember.

14 VICE CHAIR BRUCH: Yeah, thank you for that. This
15 document actually is very similar to the document that we
16 worked on for transition to organic that was led by Allison.
17 So we take this recommendation, if the vote is affirmative,
18 yes, this proposal passes, we hand this recommendation over to
19 Dr. Tucker, and Dr. Tucker will present this to the Risk
20 Management Agency.

21 Is there anything else you'd like to add to that, Dr.
22 Tucker?

23 DR. TUCKER: No, I think you captured the process
24 well. One of the things I like about this particular item is
25 that it's very focused towards one agency, where I think the

1 last one was very, very broad, so it goes to a lot of people,
2 but that's a bit more diffused than something that is more
3 targeted like this.

4 And I just -- given the decentralization of the USDA
5 system -- I think when you can be more kind of agency-focused
6 in your communication, there's more of a, quote, target
7 audience than, oh, here's this really broad set of things that
8 will go to a lot of different people but no one person is
9 necessarily accountable.

10 I think some of that is -- this is more than you
11 asked for, but I think it's worth it, given the NRCS
12 presentation which we didn't really debrief on, and I think
13 every agency has its own kind of unique culture and approach,
14 but I do think having these documents where there is a specific
15 audience in the absence of a policy advisor.

16 So a broader one, if there were a policy advisor,
17 would go to the policy advisor, and then the policy advisor
18 would be responsible for kind of making sure to connect the
19 dots. Without one right now, I like this approach of, okay,
20 here's a very specific set for a very specific agency, because
21 then I can reach out directly to the career person and say,
22 hey, we have this thing, and we really would like to know what
23 you're going to do with it. There's just more accountability.
24 That's a broader sort of process thing. Does that make sense?

25 VICE CHAIR BRUCH: Absolutely. Thank you,

1 Dr. Tucker. And one beautiful thing about this process, it's
2 targeted -- like Dr. Tucker said -- and the recipient at RMA is
3 aware that we're actually taking on this work agenda, and she
4 wanted to make sure that she received our feedback.

5 DR. TUCKER: Yeah, that makes a big difference. I
6 think one of the big take-homes from the NRCS presentation to
7 me was all NRCS is local, right? And so you've got to find a
8 buddy in NRCS and build a relationship and build up and out
9 from there.

10 And I think you did that with RMA by inviting them
11 here. She knows you now, there's that human connection. I
12 don't think you can ever underestimate the value of that
13 relationship building. So I think that has positioned this
14 better, because there's human beings on either side of the
15 conversation.

16 VICE CHAIR BRUCH: Thank you. So back to your
17 question, Wood. Hopefully in five years, we do have a lot of
18 progress on this list.

19 BOARD MEMBER TURNER: I'm really hoping too, and
20 that's great. It makes you sound even smarter than I thought
21 you were because that was a really good move. That was a
22 really good move to get them here, so that's great.

23 VICE CHAIR BRUCH: Well, thank you, I guess.

24 BOARD MEMBER TURNER: No, it's a compliment. I mean,
25 I think this is hard stuff. And I mean, what Dr. Tucker just

1 said about how hard it is to get one NRCS office at a time is
2 -- that's daunting. But if you have the opportunity to
3 actually tackle something with precision like that, I mean
4 that's great. So let's get after it.

5 BOARD MEMBER POWELL-PALM: Can I say just one thing
6 to that, Amy?

7 VICE CHAIR BRUCH: Yes, go ahead.

8 BOARD MEMBER POWELL-PALM: For a few years before I
9 was on the Board I participated in some advocacy through OTA,
10 through OFA, going to DC, trying to get a little bit at RMA
11 with these problems, as Nate was describing. And one day I
12 just get this calendar invite from Amy, and she's like, we're
13 meeting with RMA. And I'm like, oh, someone from probably my
14 local office. And it's like, Francie Tolli's face right there,
15 the head, the most powerful person we possibly could meet with
16 on this call, as Amy's like, oh, I just called her, and she
17 said, yeah, she'd love to chat. And that's the sort of bravery
18 that I'm hoping we can inspire. So thank you again, Amy, for
19 just asking.

20 VICE CHAIR BRUCH: You can count on me for a
21 question, Nate, but anyway, no, thank you. I think it's a
22 testament to what Dr. Tucker said about the human aspect.
23 We're going back to we're a family, let's build bridges. USDA
24 has many agencies. I really do think that we can work more
25 together. And we've heard this collaborative effort with NRCS

1 and organics. We're doing this with RMA. Hopefully, we can
2 just reach out and continue our network because we really do
3 want to grow this program.

4 Going back to the public commenter about how we need
5 a catalyst, we want to grow this program, we need to work with
6 other agencies to do it.

7 So, okay. We have delayed the vote for a long time.

8 CHAIR SMITH: I'm going to take back over, and I'm
9 going to repeat the motion. So I did that purposefully -- that
10 cough thing -- because Carolyn had a question, and I knew it.
11 So anyway, my voice has recovered.

12 So again, the motion comes out of CACS to the full
13 Board, motion to accept the Climate-Induced Farming Risk and
14 Crop Insurance proposal. It was motioned by Amy and seconded
15 by Nate Powell-Palm.

16 And I think we're starting with Wood.

17 BOARD MEMBER TURNER: I say yes.

18 CHAIR SMITH: Logan?

19 BOARD MEMBER PETREY: Yes.

20 BOARD MEMBER D'AMORE: Yes.

21 BOARD MEMBER DIMITRI: Yes.

22 BOARD MEMBER NANDWANI: Yes.

23 BOARD MEMBER CALDWELL: Yes.

24 BOARD MEMBER JOHNSON: Yes.

25 SECRETARY LEWIS: Yes.

1 VICE CHAIR BRUCH: Yes.

2 BOARD MEMBER QUARCOO: Yes.

3 BOARD MEMBER JEFFERY: Yes.

4 BOARD MEMBER POWELL-PALM: Yes.

5 BOARD MEMBER HUSEMAN: Yes.

6 CHAIR SMITH: Chair votes yes.

7 SECRETARY LEWIS: 14 yes, 0 no, 0 abstentions,
8 0 recusals, 1 absent. The motion carries.

9 CHAIR SMITH: Wonderful.

10 VICE CHAIR BRUCH: Excellent. Thank you so much.
11 Really appreciate that.

12 All right. Now, why don't we take a break, and then
13 we're going to tackle the remaining work agenda items when we
14 return.

15 How long do we have, Kyla?

16 CHAIR SMITH: We're going to come back at 50.

17 VICE CHAIR BRUCH: 10 minutes. Thank you.

18 (Off the record from 3:39 p.m. to 3:52 p.m.)

19 CHAIR SMITH: Okay. Before I turn it back over to
20 Amy, I just want to remind the Board that we're taking a photo
21 directly after this session, as well as alumni Board members,
22 so don't go anywhere, and we will be directed on where to go.
23 So I just wanted to remind people of that.

24 And now I'm going to turn it back over to Amy.

25 VICE CHAIR BRUCH: All right. Welcome back from the

1 break. We're going to launch into our three discussion
2 documents now. The first one up is Residue Testing for a
3 Global Supply Chain. I'm really excited to present this body
4 of work and work with the community on this, and the team, the
5 subset group that is focused on this, which is Kim,
6 Nate Powell-Palm, and Nate Lewis, and myself, amongst our
7 broader subcommittee as well informing this work.

8 Very appreciative of the interaction, though, with
9 the community. I think there was a public commenter that
10 referenced questions, and how many questions did the full Board
11 present the community? I think probably 80 percent of the
12 questions found in the packet I believe probably originated
13 from the documents in CACS. So thank you for your information
14 exchange, to inform our body of work.

15 Background on this, and I tried to select products
16 from Dr. Tucker's list that she presented in her opening
17 remarks. So some of the pictures you see here, they're from
18 Board members' family farms.

19 Organic is a process-based standard. That is loud
20 and clear from the discussions we're having on the Board, to
21 the discussions and the public comment feedback that we've been
22 receiving. We all believe that testing is a tool for
23 compliance verification. We currently, with this work agenda
24 item, have decided, with the community feedback, to really
25 revert back to foundation first.

1 When we launched this discussion document originally,
2 we were really targeted in what we wanted to accomplish but
3 found out through the community feedback that a broader based,
4 set the foundation first approach, was better. And the
5 foundation first is examining the guidance documents that
6 inform and educate certifiers and inspectors the processes to
7 conduct residue testing. A lot of those are dated from 2013
8 and 2014. So I think this is a good time to refresh.

9 It's a massive project. Again, a lot of questions.
10 I'm really thankful to be doing this work, and it's aligned
11 with the collaborative process with the NOP because they are
12 ready for this recommendation coming from the subcommittee for
13 the spring of 2025 to make action and update these guidance
14 documents for all to reference. So I'm excited that our work
15 already has a future landing spot on next steps.

16 So I'm hopefully preemptively answering your
17 question, Wood.

18 All right. There is a comment -- and we've heard it
19 a lot -- about a level playing field. This is something
20 mentioned by a lot of producers, by advocacy groups, et cetera,
21 when we're talking about testing. What I believe a level
22 playing field is, as a producer, is just all playing by the
23 same rules. I love competition. I think competition does make
24 us stronger. It is a catalyst for innovation. But we want to
25 make sure all are upholding the integrity that have the seal on

1 their products. So a level playing field is something that I
2 wanted to just make sure we are calibrated on for the
3 definition.

4 The same public commenter that mentioned about the
5 number of questions we had actually mentioned the value of an
6 executive summary. This was something that we did provide in
7 this document because it was very extensive on what we were
8 recommending for all of these guidance documents. It was
9 recommended that we keep all of the information in a one-stop
10 shop instead of parsing these recommendations out for all of
11 the documents and having several mini-documents.

12 So in lieu of a mega-document, we did incorporate the
13 summary of changes in the front of the packet, and it really
14 just highlights what we're looking to improve. The next slide
15 is going to go into public comments. But essentially, the
16 guidance documents we're reviewing are 2610 sample procedures
17 for residue sampling, 2611 laboratory selection criteria, 2611-
18 1 prohibited pesticides for NOP residue testing, and 2613
19 responding to results.

20 In addition to the updates that the NOP will make in
21 in the guidance documents, at that time it does make sense if
22 there is information that can inform new guidance documents to
23 be inserted into the packet. So that's what the last bullet is
24 in regards to, and we've had a lot of great discussion with the
25 community on this, especially surrounding the decision tree.

1 So now going into public comments. I'm going to kick
2 it over to Nate Powell-Palm. We're going to do a little bit of
3 a round-robin as we review some of these categories.

4 So go ahead, Nate.

5 BOARD MEMBER POWELL-PALM: Yeah, thank you, Amy. I
6 just wanted to get started with, I feel like I exist in a world
7 where almost all of my work is in the organic space, but so few
8 of my neighbors know even what organic is, and it's maybe a
9 fault of my own, but I think it's the truth for a lot of us.

10 And so when I hear lay folks, we'll say, talking
11 about organic, oftentimes I hear them criticize us for not
12 testing enough, they would have confidence in organic if only
13 we tested. And I think this has been a really driving
14 motivation for saying, well, we do test, and how do I make sure
15 that we're testing in a way that's really effective?

16 But there's going to be some logistics in that
17 testing. So in public comments, we heard and continuously hear
18 about human capital. I work as a trainer of inspectors, I've
19 been an inspector for a really long time, I've done a lot of
20 sampling. I've worked with Nate Lewis on building sampling
21 trainings.

22 The question of how do we train inspectors so that
23 they are both qualified but also readily able to tackle testing
24 if we change it, as we update it, as we look to make it better,
25 something we heard from public commenters and something that

1 I'm really excited for the Board to consider, how we are very
2 helpful to certifiers into the NOP with coming up with some
3 good ideas there. We have some benchmarking, some places to
4 look, for how we would go about improving the system, looking
5 to other regulatory programs, looking to existing programs that
6 are doing the work we are hoping we evolve to do in organic.

7 But then looking to that risk-based approach, trying
8 to figure out how do we get the best bang for our buck. And I
9 think that sort of brings me back to this question that we kept
10 hearing in regards to Kyla's document with Risk-Based
11 Certification about how are we all getting in the same room and
12 saying this seems like the best use of our time. And I'm
13 really excited for that in the testing space especially.

14 I think I've taken a lot of tests where I could not
15 in good conscience say that this is ever going to yield
16 anything. I've taken a lot of tests from a five-acre Amish
17 plot that maybe, even if they did spray, it's not going very
18 far. And so how we can take that same time for an inspector
19 and put it to something that might reveal greater, deeper
20 insights in how we improve the entire system.

21 Kicking it back to you, Amy, unless you want me to
22 keep going, I can.

23 VICE CHAIR BRUCH: Actually, I'm going to kick it
24 over to the other Nate and Kim right now.

25 BOARD MEMBER POWELL-PALM: Please.

1 VICE CHAIR BRUCH: Thank you.

2 SECRETARY LEWIS: I'll be focusing on moving past
3 pesticides, so herbicides, fumigants, and solvents in that
4 bullet point. We heard from public commenters that a lot of
5 our testing is really focusing on pesticides. That's a natural
6 outcome of the guidance documents that we have available.

7 So we have guidance related to collection of samples
8 for pesticide residues, analyzing those for pesticide residues,
9 and responding to them. But there are many prohibited
10 substances that could be used in production that would be of
11 risk to an organic integrity. Testing should be a tool for
12 detecting and responding to all of those types of prohibited
13 substances.

14 So we heard loud and clear that it's time to expand,
15 and maybe not move past pesticides to leave them behind but to
16 add to that toolkit. So we're going to be recommending updates
17 to the guidance that bring in herbicides, bring in tests for
18 fumigants, looking at solvents that are used for processing
19 aids -- or used as a processing aid in the conventional
20 processing industry, so that really the experience that Nate
21 described doesn't happen where an inspector has been instructed
22 to collect a particular sample, and they can sit there and go,
23 I know what the result of this test is before I collect it, but
24 really they're collecting a test that's appropriate for that
25 particular operation and the risks that are there.

1 BOARD MEMBER HUSEMAN: Yeah. Just to piggyback on
2 the moving past the pesticides, I think we heard from
3 stakeholders in both written comments and in oral comments the
4 importance of what new technologies are in the space, how do we
5 manage that evolution and look for products outside of some of
6 these basic procedures that are there? We've listened to the
7 laboratory speak about what's available and what's possible,
8 and ensuring that we are partnering in the right way from that
9 perspective.

10 I also want to acknowledge -- and as we are talking
11 about some of the pictures that we're putting up -- acknowledge
12 that the day one, we went through by value organic imports into
13 the U.S., and I want to recognize that there's different types
14 of tests for different types of pieces too to that. So I want
15 us to keep that in mind that there's a big gamut of organic
16 products that are being brought into the U.S., that are
17 produced in the U.S., and this is a big piece of the pie.

18 VICE CHAIR BRUCH: Thanks, Kim. Moving on to the
19 right test for the right situation, right reason, we heard a
20 lot of feedback from the community. And we did have one lab
21 representative on public comments that really indicated, as you
22 mentioned, the innovation that's happened on the laboratory
23 front, the speed to get results, and also the specific panels.
24 Right now, what's listed in 2611-1 is, quote-unquote, known as
25 the NOP panel, and that is something we got a lot of feedback

1 from the community that needs to be updated. For example,
2 glyphosate, dicamba, et cetera.

3 But there was also some feedback from some commenters
4 that maybe some substances are deemed necessary to remove.
5 However I would argue -- going back to this point, right test
6 for the right situation and the right reason -- when we're
7 looking at it on a global scale, some of the substances that
8 are banned from the U.S. currently are still being able to be
9 used overseas in certain countries, or certain producers
10 overseas have access to them. So understanding the regionality
11 of where the products are originating is truly important so we
12 do grab the right test for the right situation. The QuEChERS
13 test, the multi-panel residue test, is a really great test, but
14 it potentially might not be the best test for every situation.

15 And so that's why the community really provided us
16 with great feedback on moving past the QuEChERS test. I know
17 some certifiers are deploying many different tactics, you know,
18 ease deploying many different tactics, and we just want to make
19 sure the guidance documents reflect what's currently being done
20 and also the innovation that's occurred in this area.

21 SECRETARY LEWIS: And building on that, I think it's
22 important to recognize that residue testing, when used as a
23 compliance verification tool, must be defensible. So that
24 means the inspector needs to be trained, there needs to be a
25 chain of custody in sample handling, it needs to go to a lab

1 that's accredited and has the competency to perform that test,
2 the results have to be acted upon consistently and
3 appropriately, and all that requires updates to guidance
4 documents when we grow beyond the multi-residue pesticide
5 screen. I think certifiers are really good at that screen
6 right now, and when we grow into new areas for residue testing,
7 we need the guidance documents to support that so that the
8 actions they're taking are defensible.

9 And then we got a lot of good feedback on the concept
10 of a decision tree to sort of accomplish these goals of right
11 test for the right situation, ensuring that there is the
12 appropriate expertise at the certifier to take that sample and
13 respond to them.

14 And then I think there's going to be a lot of work
15 that needs to be done on responding to results. Right now, as
16 we've seen samples come in, we've been faced with situations
17 that we don't have a pathway forward on. So some examples of
18 these are concentrated products -- whether they're extraction,
19 extracted products, dehydrated products -- those can show
20 residues at levels that are higher than what was on the
21 original crop. So the crop can test clean, and once it's
22 extracted you can find some residues.

23 So that provides a conundrum. And I just use that as
24 an example for needing the responding to results to be
25 developed and become more sophisticated with all the different

1 types of crops we're sampling, the types of tests we'll be
2 encouraging folks to take, and what kind of results are going
3 to be coming back because, again, the test itself is not the
4 final action, it's the response to the test and the corrective
5 action that needs to take place that's the goal of these
6 programs.

7 VICE CHAIR BRUCH: And lastly --

8 CHAIR SMITH: Andrea, can we get a slide advancement
9 assist, please?

10 VICE CHAIR BRUCH: Okay. Next steps, I've
11 highlighted where we're going with this body of work, and it is
12 very detailed, very tactical, but that's what's necessary in
13 order to update guidance, and that is what the subcommittee,
14 based on the most recent round of stakeholder feedback, is
15 planning on doing.

16 Next, we will look at the regulations and we're
17 planning on presenting a discussion document on central
18 regulation updates, so a parallel path here similar to the
19 pathway that's been leveraged in Crops with compost.

20 But I'll turn it over to Nate to speak more on where
21 we're going with the regulations.

22 SECRETARY LEWIS: Yeah, so we have been focusing on
23 guidance, and again, that's to support ongoing activities, and
24 that's also sort of a short-term solution to expanding testing
25 as the tool that folks are using for some compliance

1 verification.

2 We have identified a challenge in responding to
3 results when it comes to exclusion of organic crops from the
4 marketplace. Right now the only pathway for excluding an
5 organic crop that tests positive is if it is in excess of
6 5 percent of the EPA tolerance for that substance for that
7 crop.

8 That should remain. That's also -- I think that's a
9 good threshold to maintain so that there is some sort of action
10 for highly-contaminated organic crops to stay out of the
11 marketplace. But there is another provision in the law that
12 gives some ability to provide exclusion from sale when a
13 prohibited substance was intendedly -- or was applied with
14 intention.

15 And so we're going to be exploring that on how to
16 make a recommendation of the Program on a regulation update
17 that's rooted in the law but that gives certifiers the ability
18 to exclude or prevent products from entering the market when an
19 intentional application of prohibited substance is identified.

20 VICE CHAIR BRUCH: Thank you, Nate.

21 I want to open it up to further discussion or
22 questions from the full Board.

23 Go ahead, Brian.

24 BOARD MEMBER CALDWELL: Yeah, thanks to you all. I'm
25 just so glad that you're doing this, and I know that this group

1 is going to be tenacious and thorough, so I'm really -- I just
2 want to thank you for taking this on.

3 VICE CHAIR BRUCH: Thank you, Brian. And this group
4 will have to work fast because two members, unfortunately, are
5 rotating off. So FYI, Kim and Nate.

6 Okay. Mindee, go ahead.

7 BOARD MEMBER JEFFERY: Yeah, amazing work. Thank
8 you.

9 Just in relationship to what Nate was just saying, in
10 California we did a GMO test pilot program under the California
11 Organic Products Advisory Committee to sort of find out where,
12 if, excluded methods were entering organic supply chains, and
13 there wasn't anywhere for it to really go in some ways because
14 there aren't tolerances for GMOs basically.

15 And so it was a great experiment and we got great
16 feedback in that, obviously, people noticed, and it obviously
17 caused people to change behaviors. We heard that from the
18 state and a certifier and a county ag commissioner. And so it
19 didn't do much because we had to protect the producers, and
20 there weren't tolerances, but do you see that expansion as
21 something that could also apply to biotechnology and testing
22 there?

23 SECRETARY LEWIS: I think GMO testing is a challenge
24 that we need to take on like in a broader context. This is
25 maybe edging into opinion here, but I think what we're focusing

1 on here is prohibited substance -- detection of prohibited
2 substances with residue testing. And while certifiers
3 certainly have the authority to take a residue test that
4 relates to GMOs or excluded methods, excluded methods are a
5 prohibited practice as opposed to a prohibited material,
6 prohibited substance.

7 And so it just throws a little bit of a wrench into
8 the gears of what system we have in place, and I think what we
9 need to do is expand, fine tune, and implement the program we
10 have for prohibited substances, get that out there in the field
11 so we're, you know, detecting pesticide drift and misuse of
12 hexane in soybean meals, all that sort of stuff, and then kind
13 of regroup and look at how do we want testing of excluded -- of
14 GMOs, i.e. excluded methods, to fit into the program that we
15 use for certification.

16 So it's a little bit more complicated than just
17 saying, yeah, let's do some GMO testing too, because of that
18 distinction between prohibited substance and excluded method as
19 a prohibited practice.

20 BOARD MEMBER JEFFERY: Yeah, appreciate your depth of
21 knowledge there. But if I were Amy I might assign you the
22 homework of keeping it on your plate.

23 CHAIR SMITH: 10 meetings does go awful fast.

24 I want to turn it over to Dr. Tucker for a comment.

25 DR. TUCKER: Just a very, very quick comment. I

1 actually -- I very much agree with the comment about excluded
2 methods. It's not like a material, it's a method. That said,
3 we have stopped shipments from entering into the U.S. market
4 based on GMO testing, so where the test revealed a percentage
5 of GMO. And so it is an effective -- it can be a very
6 effective testing and approach, and matters like when it's
7 compelling, right? It's not like, well, we have this detection
8 limit of next to nothing and we found something with next to
9 nothing plus one. I mean, it's much more straightforward and
10 can be a very, very effective tool.

11 I can also -- I have to just advertise. There is a
12 -- for folks who -- you know, maybe not, but sometimes we are
13 really good at announcing things once but then never saying it
14 again, so it's a good chance for me to advertise. There is a
15 course in the Learning Center on sampling and testing that goes
16 into more specifics about where to sample, how to sample, what
17 to sample, when.

18 So I completely agree with the need to update the
19 handbook, and that is a resource that's available right now
20 that people may not actually realize is there because, again,
21 we're really good at announcing things but not reminding people
22 of the fact they exist.

23 SECRETARY LEWIS: Thanks, Dr. Tucker.

24 I think perhaps some low-hanging fruit with GMO
25 testing is how a positive GMO test can be used as a piece of

1 evidence within a larger adverse action process against an
2 operation, yeah.

3 VICE CHAIR BRUCH: All right. Dilip, go ahead.

4 BOARD MEMBER NANDWANI: I have a quick comment and a
5 simple question. First, I echo Brian -- what he said and what
6 Mindee mentioned -- partly, you know, you answered the
7 question. But again, you guys have, you know, put together a
8 tremendous amount of work and time and I see that already, like
9 Dr. Tucker mentioned the impact of this is already in terms of
10 the international, you know, the shipments coming in and
11 because of this testing we are able to see some results.

12 At domestic, within the U.S. and from small farmers'
13 perspective, I'm a half-acre, one-acre small farmer. My
14 neighbor is having 500 -- or let's say it's a big commercial
15 farmer -- he's using a duster plane. I'm sure you may have
16 discussed this, and I may be a little ignorant, but you can
17 comment on that.

18 It's unintended, you know, the drift contamination,
19 whether it is GMO, whether it is honeybees, whether pollen,
20 grains, corn, or pesticides. You may have discussed within
21 your group, and if you want to share any thoughts on that from
22 small farms' perspective.

23 And then cost, you know, in case of the small
24 farmers, they have to bear this cost. So these tests are going
25 to be, you know, expensive for them, but it's a simple test.

1 So I'm sure you have discussed. Whatever you want to share.

2 Yeah, thank you.

3 VICE CHAIR BRUCH: You want me to take that, Kyla?

4 CHAIR SMITH: I'll do it. I'm going to jump into
5 this. So as far as the duster plane that you were talking
6 about, there is a definition of drift in the regulations. I
7 guess I'll read it. It says the physical movement of
8 prohibited substances from the intended target site onto an
9 organic operation or portion thereof.

10 So this is something that certifiers talk a lot about
11 and how to take compliance and enforcement action, depending on
12 if it was a drift situation or it was -- so, you know, the
13 plane flying over the field, and then a separate field, and
14 then that drifting, according to this definition, onto the
15 organic field, how to tackle that. Versus the duster plane
16 accidentally flying over the organic field -- they thought they
17 were flying over the other field -- and how to take compliance
18 action in that situation, and how to take compliance action of
19 a willful application, and all of those different things might
20 have different compliance pathways.

21 And the second question was related to cost. And so,
22 within the regulations, certifiers are paying for these tests.
23 Now that said, certifiers may be altering their fee schedules
24 to increase their fees widespread, you know, to sort of
25 subsidize these costs, but they're not allowed to pass the

1 specific testing cost along to the producer.

2 And I had put myself in the queue, but since I have
3 the mic, I'm just going to keep talking. And so I did also
4 want to just say that the Accredited Certifiers Association -
5 ACA -- currently has a working group going on right now on
6 pesticide residue so that we can collectively as a certifier
7 community come up with consistent approaches to those various
8 scenarios that I just talked about because, you know, there's
9 multiple factors that we think about and consider in those
10 different scenarios.

11 And then I imagine that that work will feed into the
12 work of this subcommittee, so happy to be the liaison because I
13 am participating on that working group. And yeah, I just look
14 forward to the continued conversation. Thanks.

15 VICE CHAIR BRUCH: Thank you for that addition. And
16 thanks to all the work ACA is doing in this process, a working
17 group, super helpful, and there are many tools getting
18 developed. Thank you for that question.

19 We have Allison, then it looked like Nate, and then
20 we're going to probably have to move on to the next topic.
21 That's what happens in CACS. We get buried in the
22 conversation. Thank you.

23 BOARD MEMBER JOHNSON: It's true. Thank you all so
24 much for your work on this. It's a really impressive body of
25 work, and all of the pieces and how you put them together is

1 just incredible. So I feel like we're on a really good path.

2 I wanted to flag two things that I'm holding in mind
3 as it moves forward. One is the nexus with the risk-based
4 certification and how we can both have, you know, sort of more
5 tools to catch fraud and keep folks honest without adding to
6 the burdens of low-risk operations -- and, Dilip, to your point
7 -- adding cost to our smaller scale producers. So I think
8 we're trying to walk that line, and it's really important to
9 keep an eye on that.

10 And then just one other thing to flag. I think I
11 heard in public comments someone mentioned testing for
12 synthetic nitrogen as well. So in the moving past pesticides
13 bucket, it wasn't on the slide, but I don't think we talk about
14 nitrogen enough as a selling point for organic. If we're
15 talking about climate smart, keeping synthetic nitrogen out is
16 huge, and it's also an area where I've heard it's like pretty
17 easy to cheat and pretty low risk of getting caught. So just
18 wanted to make sure that we have that in the record as the
19 beyond just the pesticides bucket, which is important in their
20 own right, but nitrogen.

21 VICE CHAIR BRUCH: Absolutely. Thank you, Allison.

22 That kind of segues us into the next topic about the
23 synergies amongst some of our work agenda items with residue
24 testing as well as risk-based certification. And then the
25 nitrogen element that you mentioned, there's just been an

1 incredible amount of work in innovation on testing to be able
2 to detect synthetic nitrogen. So that definitely needs to be a
3 part of the conversation. Thank you.

4 Do you have one last comment?

5 BOARD MEMBER POWELL-PALM: Real quick.

6 VICE CHAIR BRUCH: And then we're going to wrap it
7 up. Okay.

8 BOARD MEMBER POWELL-PALM: I just wanted to again
9 commend you, Amy, for whipping this team together. This was
10 really quick work for getting Nate and Kim and me, no matter
11 how hard we might not want to have participated, we were
12 brought together, and it was just made into an incredibly
13 effective, quick-moving team.

14 And I think just like when we think about the big
15 picture of what impact, again, are we having on the community,
16 to Dilip's point of what is that heavy regulatory burden on
17 testing a small farmer? I would take it back to my point on
18 what do you actually learn testing a tiny farmer, and how do we
19 get the biggest bang for our buck while also making sure that
20 we're not overburdening unnecessarily? So thanks for just
21 somehow convening this into kind of that focal point.

22 Appreciate it.

23 VICE CHAIR BRUCH: Excellent. Thank you, Nate.
24 Thank you to all the committee members on this work agenda
25 item.

1 And a segue, again, to the next item of business,
2 which is Risk-Based Certification, and Kyla's going to lead us
3 on that. It's a very timely conversation, and timely for
4 several reasons with the introduction of SOE, stakeholder
5 feedback, residue testing. But this work agenda item is
6 extremely timely, so I'm going to kick it over to Kyla. Thank
7 you.

8 CHAIR SMITH: Thanks, Amy. So obviously this topic
9 is really important to me. I've worked in certification --
10 like I said in my intro -- for over 20 years, and so this is
11 like what I live and breathe every day. And it has some
12 potential to have some real impact for me and my colleagues and
13 all my special certification peeps, but also for -- hopefully,
14 also for low-risk operations.

15 So there are some issues with our current process, as
16 we have been identifying, and one thing I can say from my
17 tenure in this industry -- with certainty -- is that we are an
18 incredibly resilient, adaptable, and collaborative community,
19 and I have no doubt that we can narrow in on a new process and
20 what that should look like that will better serve our community
21 and be more sustainable and help us grow.

22 We got a lot of good comments that we're going to
23 take back to the subcommittee and really dive into. We also
24 have partners at the Program, which is hugely important, and
25 also partners in ACA and many others that I know will help

1 carry out this work. So I'm just going to run through the
2 questions and highlight the public comments that we received,
3 and then open it up for questions from the Board.

4 So yeah, we did ask some questions, and the first
5 question was related to definitions, asking how their
6 operations defined risk, and then asking about whether these
7 should be codified in the regulations, and most, if not all,
8 commenters agreed that having shared definitions was really
9 important.

10 Some commenters thought that these should or could be
11 in the regulations, while others thought that these could be
12 elsewhere in other resource, such as in ACA best practice
13 documents, or currently there are several definitions that live
14 in the Organic Integrity Learning Center course on risk-based
15 oversight. So just essentially this agreement having the
16 shared definitions is important, and then we can figure out
17 where to put them so that they are readily available to all of
18 our stakeholders so that we can just keep that common language
19 and vernacular.

20 Commenters also thought that having the same general
21 risk criteria was a good idea but also acknowledged that being
22 able to remain adaptable and flexible was a good strategy. So
23 that's just something that we have to continue to have
24 conversations about, striking that balance between how
25 prescriptive we want to be -- and again, this is not new to us

1 in certification, we like to be prescriptive and vague
2 simultaneously. It's true. At least I --

3 The next question was around resources that are
4 currently available and would aid in a certified operation, or
5 a certifier being more proficient at risk-based oversight or
6 evaluation. There were several resources that were identified,
7 including the Organic Integrity Learning Center course, the ACA
8 Best Practice document -- there's a couple of them -- the OTA
9 Organic Fraud Prevention Guide, Dr. John Spink's work and
10 website the Food Fraud Think Tank, the Cressey fraud triangle,
11 the OrgTracker. Those are just some of the highlights and
12 things that were mentioned more than once.

13 There was also the idea of an interactive training or
14 certification/credentialing program that was focused
15 specifically on risk-based decision making. And that was
16 mentioned by a couple of commenters, and one commenter stated,
17 quote, a comprehensive mandatory program could ensure uniform
18 adoption across the certifying community. And then there were
19 several models that were suggested that we take a look at. One
20 is HACCP or other things coming out of the food safety
21 industry, the EU regulations, ISO 31000, the risk management
22 framework. And those were a couple of things that were
23 mentioned about models.

24 The third question was about the unintended
25 consequences that could arise from using a risk-based approach.

1 Commenters stated the following as possible unintended
2 consequences. So smaller, low-risk operations could feel like
3 they were being overlooked or undervalued in the certification
4 process. Obviously, risks could be missed. Little or too
5 little attention being paid to lower-risk operations resulting
6 in impacts to organic integrity or losing the deterrent benefit
7 of that comprehensive oversight that happens all the time.

8 Operations trying to game the system purposefully to
9 position themselves as low-risk to get the benefits that might
10 come along with that designation. Operations getting
11 complacent in their record keeping, as an example, so the fact
12 that we're there continuously helps them just stay on track
13 with the things they don't like to do as much. And then just
14 losing connection with their certifier, so, yeah, just wanting
15 to make sure that they're not feeling like they're being left
16 out on some island by themselves.

17 However, it was also noted in some comments that the
18 risk to not using a risk-based approach would be continuing to
19 overburden our small, low-risk operations, and certainly is
20 leading to certifier and inspector burnout.

21 The fourth question was related to how to reduce the
22 burden on low-risk operations, and just brainstorming around
23 that, commenters suggested the following ideas. Reducing the
24 paperwork burden, and we heard some mention of having a common
25 OSP and what that could do and how that could benefit

1 producers.

2 There were several inspection-related items. So
3 focused inspection, like on a specific element of organic
4 compliance, versus doing the full comprehensive inspection
5 annually, frequency of inspections, recommending some type of
6 tiered inspection approach, remote inspections, simplified
7 audits on inspection.

8 I already mentioned the common OSP or other, just
9 like simplified OSPs or other types of paperwork, using a
10 phased recertification or multi-year certification, and then
11 just streamlining the review processes, so taking a streamlined
12 approach to like initial or final review, or streamlining the
13 review for certain types of materials or ingredient supplier
14 changes, things along those lines.

15 The next question pertained to how the community
16 could provide information to the NOP or the certifier about
17 acute risks. And some ideas from commenters included just
18 directly reporting to the NOP or certifier either using an
19 email or a hotline, or just using the current complaint system.
20 There might need to be some adaptations as the current form on
21 the website is more specific, and if this is like a more
22 general type of thing, then there might need to be some
23 adaptations.

24 And we also heard from Jenny that incomplete
25 information -- an incomplete complaint with not a bunch of

1 evidence -- is hard for the NOP to follow up on. But anyway,
2 we can continue to have that conversation. Establishing a
3 forum of some sort. And then the NOP is collecting lots of
4 data now, and just being able to continue to have that
5 conversation between the NOP and certifiers of things that
6 they're seeing from the data, maybe at the annual certifier
7 training or something like that.

8 And the last question was directed towards certifiers
9 asking whether the risk-based criteria that they're currently
10 using as required in SOE are based off of the ACA Best Practice
11 doc, and what actions are being taken to streamline the
12 certification process for low-risk operators. And of the
13 certifiers that responded to this question, all indicated that
14 their risk-based criteria are based off of the ACA Best
15 Practice doc, but again, there was only a handful of certifiers
16 that responded, so it certainly does not cover all certifiers.

17 And most of the comments related to the actions that
18 are currently being done are more relative to high-risk
19 operations, so it was more like, well, we're doing all this
20 extra stuff for high-risk operations, and we're not doing that
21 stuff for low-risk, so therefore it's less burdensome. So I've
22 often described that as certifiers are pretty good going from
23 baseline and going above and beyond, but we're not as good at
24 looking at what can we do a little bit less of, and so I think
25 that's the conversation that we want to continue to have and

1 explore.

2 And I think it was Marnie said yesterday, just like
3 super-excited to just be engaging in this conversation at this
4 level, so let's keep doing it.

5 VICE CHAIR BRUCH: Thank you for that thorough
6 summary, Kyla. I really appreciate it.

7 Wanted to open it up to any questions from the Board.

8 Nate Lewis, go ahead.

9 SECRETARY LEWIS: Just a comment that prescriptive
10 and vague has refilled the well of memes over here in my head.
11 So just expect some stuff circulating amongst the Board.

12 VICE CHAIR BRUCH: Yeah, that's a good combo.

13 Nate Powell-Palm, did you have a question?

14 BOARD MEMBER POWELL-PALM: I'm going to cede to Kim.

15 VICE CHAIR BRUCH: Kim, go ahead.

16 BOARD MEMBER HUSEMAN: I'm going to try to keep this
17 to certification -- well, actually, I'm not. I'm going to make
18 this more of a general CACS, you know, a memes themes.

19 One thing we've heard and one thing I think CACS has
20 tackled whether -- I'm going to prelude into our conversation
21 on seed -- and as we talk about insurance ,and as we talk about
22 residue testing, the one word that we kind of get grounded back
23 with is the word risk. And when we talk about price volatility
24 -- my point is that I think risk has become such a key
25 component, and we have an opportunity here as we get ready for

1 the spring semester to not reinvent the wheel but to utilize
2 some of the same concept as we start writing some of these
3 proposals. We've talked about how residue testing overlaps the
4 risk-based certification, which I think can have some overlap
5 into some risk-based seed conversation too.

6 So I just appreciate that we leaned into the word
7 risk, and we're really tackling that head on in all the
8 different applications as it pertains to the organic space and
9 how we can help find ways to mitigate -- I'll use the word
10 mitigate -- to help bolster and continue to raise up our
11 industry.

12 CHAIR SMITH: Thanks. I'm just going to say that I
13 would encourage us all when we're talking about risk -- and
14 this came out a little bit in the discussion document and also
15 from some commenters -- but like risk of what? So I just
16 challenge us all to just be -- not just say risk, because
17 there's lots of different risks. There's like risk of I could
18 get hit by a bus when I'm crossing the street, and that's not
19 what we're talking about here. So let's try to maybe -- risk
20 of whatever. I'm just going to challenge us all to be mindful
21 of our terminology.

22 VICE CHAIR BRUCH: Thank you, Kyla.

23 Allison, go ahead.

24 BOARD MEMBER HUSEMAN: Thank you for that, Kyla. You
25 made me revise what I was going to say slightly in my head.

1 So I wanted to give an example from my certification
2 days of the risk to certifiers of doing less. I don't think
3 it's just that certifiers don't know how. It's that there's a
4 really big risk to your client, to all of your clients, when
5 you do less for one.

6 So we were in a period of relatively zealous
7 accreditation audits, and had heard that another certifier got
8 in trouble for not requiring the "certified organic by"
9 statement to be directly under the company name. And I made
10 someone throw away thousands of plastic labels because we
11 didn't want to get caught making that mistake and put all of
12 our other clients at risk. We all knew who made that product,
13 who certified it, but that detail had gotten someone in
14 trouble.

15 So this discussion document, and hopefully eventually
16 proposal, I think it's so important to be specific and detailed
17 in where certifiers are safe to let go a little bit and where
18 it keeps all of their clients safe as well.

19 CHAIR SMITH: Yeah, I just want to say that I
20 appreciated Jenny's comments in her opening remarks talking
21 about the need for the NOP accreditation team to be
22 participatory in these conversations, and they already have
23 been. So leading up to this, we got the opportunity to meet
24 with some folks in accreditation, and so I'm just grateful that
25 that conversation has started, and I'm looking forward to the

1 continued conversation because I do think that that's why
2 certifiers don't go from here to here is because we're a little
3 fearful of getting non-compliances.

4 And we -- as Jenny talked about at the NOC meeting --
5 we want A's, we want gold stars all the time. And it's funny
6 because when we talk to our clients we're like, oh, non-
7 compliances, they're like normal, it's part of the process and
8 it's, you know, put a corrective action plan, it's not the end
9 of the world. And yet we don't want to have to do that either.
10 So I just look forward -- to Allison's point -- about where we
11 can know that we can do a little bit less and not have our
12 accreditation at risk.

13 VICE CHAIR BRUCH: Thank you, Kyla.

14 Any last questions?

15 Oh, Dilip. Go ahead.

16 BOARD MEMBER NANDWANI: It's not a question, just a
17 quick comment. From the perspective -- like we mentioned
18 earlier, Nate also said -- in a small farms perspective,
19 commingling and contamination on the small farms, like acre
20 land or a couple of acres land, half is certified organic, half
21 is conventional, and doing these outreach, being working -- you
22 know, like Franklin and myself working for the industry and
23 training workshops to educate small farmers -- we have learned
24 why they give up on the certifications.

25 And part of this, couple of things -- but you have

1 beautifully presented in this one, this is going to be very
2 helpful -- that to tell them that, hey, you have to keep these
3 things in mind and you won't lose your certification. Whether
4 it is about the buffer strips or whether it is about using the
5 truck to carry or transport to the farmer's market, organic
6 produce and then conventional separate, those kinds of things,
7 and then that really helped.

8 I gave you my example, the past 10 years in
9 Tennessee, and some of the farmers they say, oh, these kind of
10 things, we are going to lose certification or give up on that.
11 So just wanted to comment on that one. So thank you.

12 VICE CHAIR BRUCH: Thanks for highlighting that,
13 Dilip.

14 All right. I'm not seeing any other questions, and
15 we're going to be moving on to the next topic, but I wanted to
16 say thank you, Kyla. I think this fits definitely right in the
17 vein of sound and sensible, and that's been a theme from
18 Dr. Tucker's introduction speech, so really appreciate the work
19 that you've done on that topic.

20 All right. We're transitioning over to another topic
21 of community importance. I appreciate the leadership and the
22 passion that Allison and Carolyn have shown in this subject
23 matter. So we'll kick it over to the two of them, for
24 Consistency in Organic Seed Use. Thank you.

25 BOARD MEMBER JOHNSON: Thanks, Amy. I'll kick us off

1 and then invite Carolyn to add in as we go along.

2 So this discussion document outlines the NOSB and
3 NOP's history of action on commercial availability for organic
4 seed and the overall stagnation in organic seed sourcing that
5 has been documented in the last decade or so, and we requested
6 input from stakeholders on what steps the NOSB can take at this
7 point to spur more organic seed use.

8 So we carried maybe more than our share of the many
9 questions in this agenda packet with nine questions with some
10 sub-questions, and we got great feedback. I think the overall
11 thrust of the feedback was we're so glad that you're taking
12 this up, we have a lot of work to do, and it's going to take
13 some time. So that's going to be the main message I convey to
14 you all is we're going to do a lot more work in subcommittee
15 based on this feedback and figure out what we'd like to bring
16 forward for the spring or fall.

17 But I'll highlight a few points that stood out in the
18 comments that, I think their comment today, and then we'll
19 highlight a few potential next steps and then really invite you
20 all to highlight what stood out to you in the comments.

21 So the first question is, is there still support for
22 the 2018 and 2019 recommendations? I think we kind of assumed
23 the answer was going to be yes to both insofar as we combined
24 them in our appendix, like overlaid them, but the answer was
25 not so clear. There was very strong support for continuing the

1 action on the 2018 recommendation which had rulemaking and some
2 changes to the guidance. But there were much more mixed
3 comments on the 2019 recommendation, so I don't think we can
4 say that we have consensus on moving that piece forward.

5 And one part that surprised me there was there's
6 actually quite a bit of detail in the 2019 recommendation on
7 the handler role, and we thought that might be a helpful area
8 to look at this point, and the comments were mixed and kind of
9 lukewarm on what exactly we should be looking at as far as
10 handlers who require growers to use certain seeds. So I think
11 that's a put our thinking caps back on issue, but it didn't
12 seem like we're ready to move anything there currently.

13 Going through the rest of the questions, we were
14 trying to get at what are the big problems, what solutions do
15 you see? Are there areas where we're kind of ready for
16 something a little more sophisticated and areas where we still
17 have a lot of basic groundwork to do? The overwhelming
18 response was this is regional, it's complicated by variety,
19 it's complicated by market.

20 There's just so many layers of issues packed into
21 seed that it's hard to make any sweeping generalizations. So I
22 think one of our jobs moving forward is to kind of look at that
23 feedback and figure out what areas we can pick off at this
24 stage to make some progress on and what areas could take a lot
25 more time.

1 I will highlight, for whatever reason, cabbage is
2 available as organic -- so any cabbage growers out there, we
3 had a lot of comments that that seed is quite available -- and
4 I think pretty optimistic feedback on grains that the market
5 isn't fully there, but it could be, minus a few crops. I know
6 Amy, you're familiar with food grade as well as white and blue
7 corn I think are particularly challenging. But overall there
8 was quite a bit of optimism for moving the needle on using
9 organic grain seeds, which is great.

10 Overwhelming interest in seeing more research done,
11 and it made us realize that we should look at what we can do as
12 a board there, and then there's a lot that is kind of outside
13 of our control, so we'll continue to look at what pieces we
14 might be able to pick off there. And then just an overall
15 sense that there's a lack of access to information that could
16 drive market -- so acreage for various crops, and what seed
17 would need to be available to meet that demand, what's
18 available now, how long does it take to bring certain seed
19 varieties to market, and how do you build for that? Where is
20 the decision making happening, like is it a year ahead, is it
21 three years ahead as far as what a farm will need, and then how
22 the system can be scaled up to meet that need.

23 So I think from here there are a few easy next steps,
24 and then we need to find a structure or kind of working way to
25 move forward that pulls together CACS, Crops, research, and

1 stakeholders, to have some ongoing feedback and dialogue to
2 continue to refine what's possible in the near term, midterm,
3 and long term.

4 So as far as easy next steps, we'd love to see the
5 NOP move forward on the 2018 recommendation, that was loud and
6 clear. So hopefully we can move beyond that past work that was
7 done and continue to build on it. The 2019 recommendation,
8 maybe we take back to the drawing board and continue to refine.

9 Our research priorities list doesn't include seed --
10 oops. So that's one easy thing that I think going into next
11 year we should really take a look at that and figure out what
12 questions we should be asking as a board as far as flagging for
13 researchers' seed research issues. So I think that will be
14 easy to move to something. What exactly we put there we'll
15 need some more thinking. And holding on additional steps for
16 the handler role, seemed pretty clear that that needs some more
17 work, and we're not quite ready to go there.

18 So from here I think we need to go back to the
19 subcommittee, think about what structures we could use to get
20 information. There was many words used to describe some sort
21 of information source that helps people figure out what's
22 available, what needs are. And I think there may be some
23 creative ways that the Board could play that role in an interim
24 way, sort of like we do with crowdsourcing research priorities.
25 Could we crowdsource every year at least a pulse check on

1 what's becoming available, what needs are. I think that's
2 something that we could think about.

3 And then are there opportunities to work with USDA
4 and the Economic Research Service to get at some of these data
5 questions. We have access to a subset of information, but
6 there are a lot of resources within USDA that could help guide
7 folks who are thinking about getting into organic seed
8 production and reaching market needs, so we can explore that as
9 well.

10 So it's a little amorphous, but hopefully that gives
11 you a sense of where we're thinking we can go with this, and I
12 hope that over the course of a few meetings we can start to
13 pick off pieces that can move in the near term, and then also
14 keep this sort of like long game in mind and figure out how we
15 tackle this underlying commercial availability problem which is
16 that this area's so complex, it's going to be really hard to
17 get teeth into commercial availability, so how can we use other
18 levers to push us toward greater organic seed use over time?

19 Carolyn, what did I miss, or what can you add?

20 BOARD MEMBER DIMITRI: I guess I -- you did a great
21 job -- I have only two thoughts. So one is I think it would be
22 really interesting to see some analytical research looking at
23 the barriers to organic seed adoption. And then the other
24 question that really kept running through my head yesterday, or
25 someday, was is the commercial availability requirement

1 actually a barrier in and of itself, or is it actually like a
2 spur for innovation in seed?

3 And I think that people are assuming that it maybe
4 would spur innovation, but it doesn't seem that it necessarily
5 has worked that way. So just maybe a deeper look at what kind
6 of incentives are set up by such a cause. We would love to
7 hear what other people think.

8 VICE CHAIR BRUCH: Wonderful. Thank you, Alison and
9 Carolyn, for that summary. Really appreciate your work on this
10 topic.

11 Any questions from the Board?

12 Okay, we've got Nate Powell-Palm, Nate Lewis. Go
13 ahead.

14 BOARD MEMBER POWELL-PALM: The words of our
15 commenter Kendall are still ringing in my ear. I haven't
16 really seen how farmer input is being considered in this
17 discussion. It seems like we have those who will benefit --
18 seed houses, breeders, other folks -- but the folks who are
19 going to pay for this don't seem to be at the table.

20 BOARD MEMBER JOHNSON: Seed growers are producers.

21 BOARD MEMBER POWELL-PALM: Couldn't agree more.

22 BOARD MEMBER JOHNSON: So, yeah, I think this is
23 actually a huge opportunity to cultivate more organic farmers
24 and grow markets for them. Right now it's really tough. One
25 of the messages I came through is it's tough to be an organic

1 seed producer because you have no guarantee, even with the law
2 as it's currently written, that someone's going to buy your
3 product. So our job is to make that a safe market for a seed
4 grower to get into.

5 I also took Kendall's remarks to heart in terms of
6 making sure that farmers have the tools they need to meet
7 market demand, and how do we shift that market demand to make
8 sure that we're not overlooking opportunities to create demand
9 for organic varieties and we're sort of stuck in this
10 conventional loop. And that we want to have innovation, we
11 want people to be trialing new varieties, and that requires
12 some flexibility.

13 So yeah, I hear you and agree, and hear the
14 commenters that there's some value in bringing in genetics from
15 non-excluded methods -- genetics from the conventional side so
16 that we can continue to innovate in organic. But at the end of
17 the day, our obligation and goal I think -- and what was made
18 clear in the 2018 recommendation -- is that we're driving
19 toward all or nearly all organic seed use, which is very
20 important.

21 BOARD MEMBER POWELL-PALM: If I may follow up real
22 quick. I do really appreciate the idea that we're bringing in
23 producers who are themselves going to benefit.

24 The producers I'm talking about are about 99 percent
25 of all the other producers who are going to pay for this. As

1 the seed producer, I'm going to make money, I'm one of the
2 beneficiaries as a seed company. How are we bringing those
3 folks whose bank account is going down to pay for this, and
4 align on all the goals? And this is purely a logistics
5 question. How do you and Carolyn intend to draw out those
6 communities to make sure they're at the table?

7 BOARD MEMBER DIMITRI: I can say something here. So
8 I think part of the problem is if -- some producers like
9 Kendall are willing to pay and actively go out and find organic
10 seed and others are not -- and if we let that go on then you
11 actually have one group with a cost advantage. And so I think
12 maybe raising the bar should put everyone in a more similar
13 cost position, and hopefully they can get a higher price at the
14 other end for doing so. But that won't happen unless you have
15 enough people using the higher-priced seed. And there was --

16 BOARD MEMBER POWELL-PALM: I'm going to push back
17 just a tiny bit more real quick, and this is just from the
18 farmer point of view. I think we've done a really good job on
19 this board drawing out these communities and bringing them into
20 the conversation. And I'm about to term off, so I won't be
21 able to do anything but comment on this. Is there a way that
22 over the next few months we can come up with a plan for trying
23 to really understand what this means to those growers who are
24 going to be pushed to buy more organic seed?

25 BOARD MEMBER JOHNSON: I had something here. Oh,

1 there it is there. I did want to flag one comment that stood
2 out to me around actually finding a lot of benefits from using
3 organics -- like seeds that are grown in organic farming
4 systems providing benefits to the farming systems that are
5 using them -- that they're better adapted to an organic
6 management system and ultimately more effective for the
7 farmers.

8 So I think there's a cost/benefit balance that did
9 come through in some of the comments. But I absolutely take
10 your point that it sounds like there are a number of task
11 forces, coalitions of coalitions coming together, and I
12 definitely hear you that it's really valuable to hear directly
13 from producers who are impacted as well. So we each represent
14 the constituency that we represent here on the Board and out
15 there in the stakeholder community, so I think we're counting
16 on everyone to show up and share their perspective and surprise
17 us with comments -- which is what I think happened in this case
18 to some extent -- and continue to spin this around and improve.

19 BOARD MEMBER DIMITRI: And just to follow up with
20 that, I don't think that we're planning to force this upon
21 people. I think we want to understand what are the barriers to
22 adoption? And if the barriers are cost, then I think that's
23 something we have to take into account, right? And then if
24 that's the case, then you have to ask about are you willing to
25 let the organic seed aspect just fall aside, and maybe people

1 are okay with that.

2 I mean I don't have the answer. I think we're
3 exploring, and we're not trying to make things less competitive
4 for farmers. So I apologize if this came across as something
5 that was like a punishment to farmers in terms of lower
6 profits. You know, I'm all about the farm profit.

7 BOARD MEMBER JOHNSON: And I think some of the
8 feedback that came through in comparing our opportunities to
9 the EU model were that once you have a line in the sands that
10 you do have to source organic, the competition comes. And so
11 that's another area where we start to get at price, we start to
12 get at what options are available. But it does seem that
13 having the spectrum of options that we currently have is
14 creating a lot of market uncertainty that has probably driven
15 up prices to some extent for organic seed.

16 VICE CHAIR BRUCH: Thank you. Good thing we have an
17 economist on our panel, on our Board.

18 All right. Nate Lewis, then Brian, then Kyla.

19 SECRETARY LEWIS: Just a couple of thoughts. I
20 think, going back to 2015, I got to go on a tour when we had
21 our NOSB meeting in Stowe, Vermont. I got to go on a tour of
22 High Mowing Seeds, and something the founder, Tom Stearns said
23 at that tour has sort of really lasted with me which is that
24 you the way to grow organic seed is not by forcing farmers to
25 use them, it's by increasing and improving the quality of those

1 seeds so that it's the thing that they want to choose to use.

2 And I sort of take that -- and maybe his thinking has
3 evolved in the last 10 years so I don't want to sort of
4 attribute that to him now -- but it has definitely left a mark
5 for me that part of the reason that farmers aren't choosing
6 organic seeds is because the quality isn't there. And we have
7 a system of seed breeding that has developed within
8 conventional, you know, using conventional chemistries, and so
9 we have inbred parental lines that are pretty wimpy plants and
10 need a lot of help to survive, but they're the ones that
11 produce the hybrid seeds.

12 And so I think part of this effort should be in
13 learning why we can't produce certain varieties at a quality
14 that's comparable to conventional, and acknowledging that is a
15 really good a really good step so that we're not trying to
16 achieve something that may be impossible in an organic system.

17 VICE CHAIR BRUCH: Thank you, Nate.

18 Go ahead, Brian.

19 BOARD MEMBER CALDWELL: Yeah, thanks, everybody.
20 This definitely pushed some of my buttons late in the day here.
21 But a bunch of things.

22 And also, Nate, I wish it was true that -- this is
23 speaking from my like experience as a vegetable grower and as a
24 researcher -- I wish it was true that conventional seed
25 sometimes didn't do as well under organic conditions, but

1 usually the best conventional varieties -- the best varieties
2 that do well for conventional growers are the best ones for
3 organic. It's not always true, but it's usually true.

4 And so I think what's happening is that especially a
5 lot of small-scale organic vegetable growers are taking a
6 voluntary financial hit by ordering 80 percent or more of their
7 seeds as organic. But a large-scale grower may want to compare
8 a contract for seed growing for a specific variety -- that they
9 really do have very particular requirements in terms of
10 quality, size, shape, everything -- they might try to contract
11 that as organic, you know, to be produced organically, and it
12 may cost them 2- \$300,000 more for their seed. That's a strong
13 disincentive.

14 And I think that's what we unfortunately have to look
15 at here is trying to, unfortunately, not ask our organic
16 growers to take the hit on that sort of disincentive but
17 somehow make it a financial disincentive to be using that
18 untreated conventional seed. I don't know how we do that, but
19 I'm just laying it out there that this is the way it looks to
20 me. People are -- our growers are trying hard, and they're
21 sacrificing maybe a few thousand dollars, but if it's going to
22 be a hundred thousand dollars it's really hard to make that
23 decision.

24 BOARD MEMBER JOHNSON: Yeah, and I think there are a
25 lot of things that came up in comments that are probably

1 outside the Board's purview but are necessary here, so
2 subsidies, what are the financial incentives at play here, what
3 research is being subsidized, what isn't?

4 My leading question to Amanda earlier may have been
5 too subtle, but I'm looking at NRCS programs and can we look to
6 an example that currently exists that rewards farmers from
7 switching from treated seed to untreated seed? Can we have
8 something similar that rewards farmers for switching to organic
9 seed and helps make up that cost gap?

10 I think there's a lot of creativity that can be
11 applied to the problem to get at the economics, and we may have
12 a role in kind of naming some of that even though we don't have
13 control over it because, yeah, there's a lot at play here. I
14 really hear you.

15 VICE CHAIR BRUCH: Thank you, Alison.

16 Oh, Carolyn, go ahead.

17 BOARD MEMBER DIMITRI: Yeah, I just want to add one
18 thing to that. I mean I think it's probably unreasonable to
19 think that we'll come up with like very specific answers
20 because these are really complicated questions, and I can see
21 like what Brian talked about, that's probably like a three-year
22 research -- it's a three to five-year research project to
23 really understand.

24 And, you know, well, hopefully we can just get this
25 started and future boards will take it as we go forward, but I

1 think it's also we have to think about what we can do in like
2 one to two to three years that is impactful.

3 VICE CHAIR BRUCH: Thank you, Carolyn. We're going
4 to take 10 more minutes because we have a few people in the
5 queue. And then, like you mentioned, Carolyn, I think we'll be
6 at this subject for a little while, so there'll be plenty of
7 opportunity.

8 But let's go to Logan, Kyla, Jerry. Okay? Thank
9 you.

10 BOARD MEMBER PETREY: Are we going on break, or can I
11 talk?

12 VICE CHAIR BRUCH: Oh, yeah, sorry, no break. You're
13 up, sorry.

14 Logan, you're up. Sorry. Oh goodness.

15 BOARD MEMBER PETREY: Oh my gracious. Okay. All
16 right. So I wanted to comment on just reminding you guys, so
17 the European Union they are going to the organic seed in, what
18 we said, 2036. A lot of vegetable seed comes from Europe, and
19 so I don't know if we use the same varieties that they're
20 using. Like Bejo has a lot, we use a lot of seeds from them.
21 And so maybe that is, you know, they will have a big supply
22 that we're able to crack into.

23 So I don't know where that fits in any of this
24 discussion, but maybe if they're making the leaps there, then
25 that may help on the vegetable because it's very complex in the

1 vegetable industry using those types, and the disease
2 resistance that some of these varieties have, I mean it's the
3 difference in -- there's a certain variety of Lacinato kale
4 that we can grow here, and we can grow any other variety. And
5 so it's we thought we just could not grow the crop until we
6 came across another variety, and we can, you know, and we do
7 quite well at it. And so hopefully with the EU bringing some
8 of these varieties on, that's going to open up opportunity too.

9 VICE CHAIR BRUCH: Thanks, Logan.

10 Let's go to Kyla.

11 BOARD MEMBER JOHNSON: Can I respond to that real
12 quickly?

13 VICE CHAIR BRUCH: Sure.

14 BOARD MEMBER JOHNSON: So what we heard in comments
15 is that that's not happening. Maybe it will, Logan, but it
16 sounds like because you have a guaranteed market in Europe,
17 companies are marketing organic varieties there, that they're
18 not marketing in the U.S. because they don't know if anyone
19 will buy it. So that's where there's this push-pull between
20 leaving farmers the flexibility they need, not having onerous
21 requirements, but having enough of a market signal that the
22 strides that have been made in organic production of our seed
23 can benefit farmers here.

24 VICE CHAIR BRUCH: Kyla, go ahead.

25 CHAIR SMITH: Yeah, I just was going to comment on

1 commercial availability, and we heard a lot of comments about
2 commercial availability, and it's a challenge for certifiers.
3 We get put in a very awkward position when trying to determine
4 compliance with commercial availability because it's -- what
5 are we going to say? No, you're lying? So it's a challenge.

6 So and I feel like -- I don't know, I feel like we
7 got comments that were like this is problematic, we need to
8 rethink this approach. And then there was -- not in relation
9 to seeds -- but then there's been comments about applying
10 commercial availability in other parts of the regulations too,
11 and it's like we've got to pick a lane there. So I'm just
12 looking forward to that conversation.

13 And then the other thing I was going to say, just
14 again more specifically about commercial availability, and
15 we're talking about the handlers role is that currently -- and
16 this came out in some comments, and just pointing to the ACA
17 best practice document on seed, and a lot of certifiers follow
18 those best practice documents -- and that the sourcing
19 requirements by handlers, that they are doing those commercial
20 availability searches and then are providing that documentation
21 to the producer directly.

22 And if that is a system that is working, then maybe
23 we don't need to go down the regulatory path for applying
24 commercial availability to handlers since we know it's already
25 problematic, we're going to be rethinking -- maybe trying to

1 rethink it anyway. And then just some commenters have talked
2 about the slippery slope of applying crop practice standards to
3 handlers, and just thinking about that. Thanks.

4 VICE CHAIR BRUCH: All right. Jerry, you're up.

5 BOARD MEMBER D'AMORE: Well, thank you. I've got a
6 question for you, Nate, and then I've got a comment after your
7 answer. And I don't know what was ahead of this sentence that
8 I heard, but you said farmers push to buy organic seed. And my
9 question would be to this whole group, have we categorized the
10 pushers? Do we know who the pushers are?

11 Okay, I didn't want to put that in your shoe without
12 telling you that that's what I heard, and that's what drives me
13 to this question because -- to my experience -- you've got the
14 broad category of retailers you would call buyers, and that is
15 predominantly a fresh market. And if at this point we don't
16 give full credit to the significant volumes that the handlers
17 that give the value added to frozen product, et cetera, I think
18 we might miss the mark because the characteristic of a, for
19 instance, blueberry that is ideal for the frozen market is not
20 ideal for the fresh market, need a tougher skin or not, or it
21 could be sweeter, could be softer.

22 So you just triggered my thought is that a starting
23 point on some of these discussions is who the pushers are.

24 BOARD MEMBER POWELL-PALM: I think we might be using
25 the word push differently.

1 BOARD MEMBER D'AMORE: I'm sorry, what's that?

2 BOARD MEMBER POWELL-PALM: I think we might be using
3 the word push differently.

4 BOARD MEMBER D'AMORE: Okay.

5 BOARD MEMBER POWELL-PALM: So, if I hear you right,
6 you're using push as like folks who are going to be providing
7 the seed and a pushing them to use it, encouraging them to use
8 it.

9 BOARD MEMBER D'AMORE: I'm doing it the other way.

10 BOARD MEMBER POWELL-PALM: Okay. Then maybe we're
11 the same.

12 BOARD MEMBER D'AMORE: It's the pull. It's the
13 retailer that's got --

14 BOARD MEMBER POWELL-PALM: Yes.

15 BOARD MEMBER D'AMORE: Yeah, okay.

16 BOARD MEMBER POWELL-PALM: Cool. So I say, I would
17 agree with my use of the word push of it's -- either a
18 regulatory or an otherwise -- being compelled to use them
19 through a number of mechanisms, versus the pull which I would
20 be really excited about exploring.

21 And I think we're, you know, I like a lot of the work
22 that we're doing here. The idea of handlers not just being
23 brought to task or sort of skipping the expense of using
24 organic seed, but really, you know, becoming sort of a
25 catalyst, a driver of trying to get their suppliers to use it.

1 Yeah. So I would say I'm aligned.

2 VICE CHAIR BRUCH: All right. You're aligned.

3 Wonderful. Thank you.

4 BOARD MEMBER POWELL-PALM: But that wasn't my
5 comment.

6 BOARD MEMBER D'AMORE: No, no, no. Let me thank him
7 for his clarification, and I appreciate that you'll listen to
8 those distinctions.

9 VICE CHAIR BRUCH: No problem. This is what I love.
10 I love diving into these topics. I appreciate all the extra
11 time that we have taken on this. I wish we could have more.
12 This is a really important subject matter. And I myself, I'm a
13 grower, I have grown seed as well, so I'm looking forward to
14 contributing to the conversation.

15 I know we have limited time here, but I really liked
16 your idea, Allison, about focusing in on some of those
17 barriers, too, so we can really unpackage this.

18 But awesome. I'm so excited for this slate that we
19 have. I'm excited for the willingness for this team to tackle
20 these complex yet very important to the organic community
21 issues, and also I just want to highlight the incredible
22 passion behind each of the drivers of these subject matters.

23 You can tell that that -- I think that's where the
24 rubber meets the road here. We're very passionate on the work
25 that we're doing in this committee, and we are so thankful to

1 share it with all of the Board members here and the community.

2 So with that, I'll turn it back over to Kyla.

3 But I forgot to say thank you to you two, so thanks.

4 Thanks for all your good work.

5 CHAIR SMITH: Yes, here, here. I definitely -- I
6 mean I could talk about this stuff all day, we'd be here till
7 midnight. But with that, we are concluding CACS. Thanks, Amy,
8 for your leadership and for all the members' participation. It
9 is a fun subcommittee.

10 With that, we are going to recess until tomorrow at
11 8:30 Pacific time, so that's Thursday, October 24th. Thank you
12 again to everybody who's sticking with us in the gallery here
13 in the room as well as on Zoom. The links will be the same
14 tomorrow. So again, hope to see you tomorrow, and enjoy your
15 night.

16 Don't forget about the Board photo, y'all. Follow
17 Penny.

18 (Whereupon, at 5:13 p.m., the meeting was adjourned,
19 to reconvene on Thursday, October 24, at 8:30 a.m. PT.)

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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2024 MEETING
PLACE: Portland, Oregon
DATE: October 23, 2024

was held according to the record, and that this is the
original, complete, true and accurate transcript which has been
compared to the recording accomplished at the hearing.



Elaine M. LaRosee,
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2024 MEETING

Thursday,

October 24, 2024, 8:30 a.m., PST

Hilton Portland Downtown

Atrium Ballroom

921 SW Sixth Avenue

Portland, Oregon 97204

National Organic Standards Board (NOSB) Members

Kyla Smith, NOSB Chair

Amy Bruch, NOSB Vice Chair

Nate Lewis, NOSB Secretary

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

Allison Johnson

Nate Powell--Palm

Mindee Jeffrey

Dilip Nandwani

Logan Petrey (Webex)

Franklin Quarcoo

Wood Turner

Javier Zamora (absent)

USDA/National Organic Program Staff

Erin Healy, Division Director of Standards (Webex)

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Andrea Holm, Agricultural Marketing Specialist, Standards

Devon Pattillo, Agricultural Marketing Specialist,
Standards

Johanna Mirenda, Agricultural Marketing Specialist,
Standards

Heather Kumar, NOSB Technical Support Staff

Dr. Jennifer Tucker, Deputy Administrator, NOP

Michelle Arsenault, Advisory Committee Specialist,

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1 PROCEEDINGS

2 (Time: 8:31 a.m.)

3 CHAIR SMITH: Okay. Good morning, everybody.

4 Welcome to day three. Thanks for hanging in there with us.

5 The crowd is dwindling in the room, but welcome back to those
6 who are with us here and also in the Zoom world.

7 We're going to start with the Materials Subcommittee
8 this morning, and then we'll head to Handling, and then we'll
9 conclude Handling this morning. We'll hit lunch.

10 We do have a deferred vote, one deferred vote so far,
11 which we'll handle after lunch. That's compost. We'll look at
12 our future work agenda items, and we'll do officer elections,
13 have recognition of our five outgoing members. There will be a
14 cry session during that portion, and then we'll send everybody
15 on their merry way.

16 Okay. So, Franklin, I'm going to hand it to you,
17 sir.

18 MATERIALS SUBCOMMITTEE

19 BOARD MEMBER QUARCOO: Welcome, everyone, to the
20 Materials Subcommittee part of this session. We have two
21 proposals and one discussion document. The first -- one
22 proposal on research priorities, another on the net
23 ingredients, and then a discussion document on excluded
24 methods.

25 But before we get ahead of ourselves, I want to take

1 this opportunity to show appreciation to the other members of
2 this subcommittee. It's been a hardworking committee. We've
3 tackled a number of very important things, and I've just
4 enjoyed working with you all. We've had a lot of assistance.

5 Heather, I mean, when it comes to internet and other
6 things, we ask for stuff, and then she asks, oh, I can do this
7 extra stuff. I'm talking about the food technologies. We've
8 received a lot of assistance. Joe and Michelle, everybody. So
9 I just want to, Jared, no, there are times we are doing
10 something, and they just gently point us in the right
11 direction, so we are always on track, and I just want to say
12 that.

13 So now let's move on to the first item, which is a
14 Proposal on Research Priorities, and I'll call on Wood.

15 PROPOSAL: Research Priorities 2024

16 BOARD MEMBER TURNER: Thanks, Franklin. Nothing like
17 having the least anticipated item on the agenda for this
18 committee today. Not to say that there's not something that's
19 not really important. And I, you know, said before to this
20 panel, and I'll say it again, you know, it's one of those --
21 this is one of those things that we do that when I first came
22 on the board, it always felt somewhat perfunctory to me. It
23 was a rolling list of research priorities, and I inherited it
24 at a certain point and took over this process. And I really
25 enjoyed kind of reminding myself that this actually is a really

1 critical part of what we do, and I would say that the
2 community's continued engagement on these issues is helpful in
3 that reminder.

4 You know, we don't know everything, I'll be the first
5 to say. You know, we all have a lot of experience, but we need
6 to know more. We need to learn more. We need to figure out
7 how to make organic better, and I do think the research
8 priorities are really key.

9 I think we spent a lot of time over the last couple
10 of years trying to make our priorities more meaningful. We've
11 tried to create a list, you know, tried to prioritize and order
12 things that we think are the top priorities, things that we
13 think are sort of ongoing issues, so that, you know, to try to
14 send a signal to the research community that, you know, that if
15 there's some things that we want to see the most focus on, it's
16 those top priorities. And, you know, of course everything else
17 needs support as well, needs research as well. So, you know, I
18 do appreciate the -- what I think is sort of a deeper
19 engagement on these issues from our board at this point than it
20 was when I first came on. I feel like we've sort of kind of
21 come to terms with what this can be, and I'm excited about it.

22 I'll keep it brief. I -- there's -- I think the
23 community has commented. We -- you know, we get solid comments
24 from the community.

25 Let me say one more thing. I do think one of the

1 things that I'm -- I still feel like I want to leave behind to
2 Franklin and the subcommittee is, you know, the continued need
3 for hearing about what's happening with research priorities,
4 getting a feedback loop, understanding who's doing research,
5 what's happening in the world, even if it's not fully, you
6 know, fully baked, fully complete. We do -- I think we do need
7 to hear sort of where these priorities are sort of finding
8 their way out into the research community, and I did have a
9 conversation this week.

10 Where is it you guys are meeting in the spring? I'm
11 not tracking it anymore. No, Arizona State.

12 And the idea that maybe, you know, the opportunity
13 to, when we're in communities for meetings where there's a
14 research university, that we reach out to those who might have
15 been affected by the research priorities and give those folks,
16 those local folks, an opportunity to come into these meetings
17 and be that feedback loop, because I almost feel like in some
18 ways that may be more valuable to us as a panel, those
19 individual research projects, than sort of an overarching
20 presentation about sort of where and how the numbers of, you
21 know, researchers that have been touched by some of these
22 priorities and some of this funding. So, anyway, just a
23 thought. I look forward to hearing how that evolves over time.

24 Comments have been interesting. We do hear about
25 that feedback loop issue in the comments on a regular basis.

1 Just a few other comments that I thought were interesting.

2 The idea of adding, in the next cycle, adding PFOS to
3 all categories or moving it to the general category. The
4 potential for, as we've heard before, organic seed research.
5 Allison made that point very clearly yesterday, and I thought
6 it was great. More clarity, more refinement of racial equity
7 topics in the research priorities. Adding phthalates and
8 plasticizers to the BPA research priority was one that I
9 thought was interesting. The ongoing -- in several comments --
10 the ongoing issue that's near and dear to me, the idea of
11 getting plastics out of organic. And, you know, I continue to
12 wonder what that research actually is, but I think there's
13 something there.

14 The need to do more research into pathways to more
15 organic pork. Deeper ancillary ingredient review research.
16 Ongoing advocacy for on-farm research, in addition to
17 university trials. And then, the one, I thought this was
18 particularly helpful, development of scientific methodology to
19 assess and quantify soil biological activity in an accurate and
20 accessible way.

21 So I think there's a few things that we continue to
22 hear about, and I'll make sure to summarize those as we phase
23 off here for the panel for consideration in the next cycle.
24 But, you know, great ongoing dialogue with the community, and I
25 welcome any questions.

1 CHAIR SMITH: Amy?

2 VICE CHAIR BRUCH: Wood, thank you for kicking us
3 off. This is a really important topic to the community.
4 Thanks for summarizing it. I've really enjoyed your work on
5 this over the years, and I appreciate it.

6 Brian's been a liaison to the subcommittees that I
7 sit on, so it's nice to kind of have that partnership there.
8 And thanks for stewarding the process in crops, Brian.

9 I love our list. I think it's wonderful. I think
10 these are issues. We need to solve them. But one thing I love
11 more is crossing things off this list. So let's do it,
12 community.

13 I think one thing that I know, our jurisdiction is
14 not the Farm Bill. I understand that. However, the Farm Bill
15 does influence funding for these types of situations. So when
16 we ask for research dollars in the Farm Bill -- I'm talking to
17 the community here -- we need to specifically say why we need
18 these research dollars to cross these things off the list.

19 This is a community list. It's -- we've coalesced
20 around this. We've got comments and feedback. We need to make
21 some movement because, you know what? There's a lot of things
22 on deck that need to go on this list like Wood had mentioned.
23 So I think that's an awesome opportunity. We're going to be in
24 Arizona State. Let's get to the folks that matter to have them
25 help us. And let's do some outreach.

1 I know we talked. There were some public comments
2 last semester about breaking down barriers, reaching out
3 outside of our community, but still staying in the realm of
4 agriculture. There are several groups. They call themselves a
5 hit above the waist. They are getting things done and we need
6 to partner up with them so we can keep moving the community
7 forward and accomplish this 80 percent of market share that was
8 indicated by a commenter the other day. We need to accomplish
9 that a lot faster than his timeline had set out. So I'm really
10 jazzed up about this list, but, yeah, we need to keep making
11 progress on it and really turn it upside down in how we're
12 getting things done, I think.

13 And the transparency is really important in the
14 feedback loop. I think that accountability piece actually
15 heightens the ability to start crossing this off -- things off
16 the list. So thank you.

17 CHAIR SMITH: Mindee?

18 BOARD MEMBER JEFFERY: Wood, I just want to say thank
19 you for all the work you've done in this. I know that who you
20 are inside of this process pushed us forward into a new realm
21 of engagement with these research priorities and really, like,
22 reinvigorated what we do with this work. And I really, really
23 appreciate your depth of commitment, and the broad spectrum of
24 how you look at things and how you cause us to look at things.
25 And so thank you for re-enlivening the research priorities

1 project.

2 CHAIR SMITH: Nate?

3 SECRETARY LEWIS: Yeah. And in sort of the vein of
4 the reimagining, one of the things I'd love to see the
5 subcommittee do in the next few years on this is to think about
6 not just the subject matter of research priorities, but also
7 the methods by which we do research. And I'm trying to get to
8 the point that academic research or the research that's done
9 within the realm of academia is extremely valuable, but so is
10 what farmers call kind of shotgun science where the on-farm
11 practical, this is a tool that works. We don't need to
12 actually understand why it works if it works. So trying to
13 think about these priorities, both within the subject matter,
14 but also the methods of obtaining results that are practical
15 and useful for farmers. I'd love to sort of see how we could
16 shape this proposal going forward to kind of maybe bifurcate to
17 that degree or add some nuance to that, in that vein.

18 CHAIR SMITH: Carolyn?

19 BOARD MEMBER DIMITRI: Thanks again for this highly
20 organized list. I like the categories. That really works for
21 me.

22 I just wanted to mention that the Organic Farming
23 Research Foundation is partnering -- is piloting farmer-led
24 research trials. And I think just get the word out to the
25 farmers that you know that are interested in doing research on

1 their farm and they have a system and a little bit of money to
2 help make those projects happen.

3 CHAIR SMITH: Allison?

4 BOARD MEMBER JOHNSON: I wanted to echo Mindee.
5 Thanks for how much energy you've put into this list, Wood, and
6 I think one development that has happened in my time here is
7 the prioritization and really forcing us to think about, okay,
8 there's so much to take on here. Let's keep that big list, but
9 let's also name the things that could really move the needle or
10 that are of utmost importance. So I think it strikes a really
11 good balance there that I appreciate.

12 And just flagging one place where it's been really
13 useful is celery powder. For years, I saw that on 606, and I'm
14 like, well, just grow more celery. What's the deal? And
15 engaging with a research team who's been working on this to
16 identify barriers and figure out where the hangups are and then
17 continue to push to try to overcome them, I don't know that we
18 would be getting into that level of detail here if we didn't
19 have this research list as a nexus to pull together those
20 threads. So, thank you for your work to steward it, and
21 hopefully you'll come back and keep helping us.

22 CHAIR SMITH: Sorry, Franklin.

23 BOARD MEMBER QUARCOO: Yes. Talking about farmer-led
24 research, as a researcher myself, sometimes when you involve
25 farmers in research, there's an aspect that we may not be

1 paying a lot of attention to, like having some kind of study
2 that shows the best practices in that kind of relationship
3 between researchers and farmers to get good quality data.

4 Sometimes you have a research plot set on a farmer's field, and
5 you want the data collected in a particular way, but the farmer
6 might feel, I just prefer to do it this way, and the data comes
7 out not being so. We work with them sometimes without giving
8 them the necessary training so we can get the best out of the
9 data that we collect. So if some kind of research can be done
10 on the best practices and the kind of training we can offer
11 farmers so we can work together and get the best kind of data
12 out of their collaboration.

13 CHAIR SMITH: Dilip?

14 BOARD MEMBER NANDWANI: So kind of a clarification.
15 Thanks, Wood, for this comprehensive list, and really nice
16 work, the group that did it. Is this list going to be for the
17 next five years, if it is approved? The reason I'm asking --
18 or a certain number of years -- the reason I'm asking because
19 the research is always something keeping -- new. This is
20 priorities keep coming. You know, we are in the fast-pacing
21 world where new issues and topics keep coming from the
22 scientific world or from farmers, stakeholders, industry, and
23 especially with this climate change and a lot of things going
24 on around, so I'm just curious to know that we are open in the
25 next maybe, you know, three or four years, we can add more if

1 something comes up?

2 BOARD MEMBER TURNER: We do it every year. This is
3 an ongoing document.

4 BOARD MEMBER NANDWANI: Thank you -- that's all.

5 BOARD MEMBER TURNER: This is a living document.
6 Things typically will stay on as the priority is maintained,
7 but we can add things all the time.

8 BOARD MEMBER NANDWANI: Oh, okay. Excellent. Thank
9 you.

10 CHAIR SMITH: I think we're ready to vote. So the
11 motion comes before the Board to accept the proposal on the
12 2024 NOSB research priorities. It was motioned by Wood and
13 seconded by myself. And I think we're starting with Logan.

14 BOARD MEMBER PETREY: Yes.

15 BOARD MEMBER D'AMORE: Yes.

16 BOARD MEMBER DIMITRI: Yes.

17 BOARD MEMBER NANDWANI: Yes.

18 BOARD MEMBER CALDWELL: Yes.

19 BOARD MEMBER JOHNSON: Yes.

20 SECRETARY LEWIS: Yes.

21 BOARD MEMBER QUARCOO: Yes.

22 BOARD MEMBER JEFFERY: Yes.

23 BOARD MEMBER POWELL-PALM: Yes.

24 BOARD MEMBER HUSEMAN: Yes.

25 BOARD MEMBER TURNER: Yes.

1 CHAIR SMITH: Chair votes yes.

2 BOARD MEMBER TURNER: Fourteen yes, zero no, zero
3 abstentions, zero recusals, one absent. The motion carries.

4 CHAIR SMITH: Back to you, Franklin.

5 Proposal: Inert Ingredients in Pesticide

6 BOARD MEMBER QUARCOO: Second proposal is on inert
7 ingredients in pesticide products, and Nate will lead that
8 discussion.

9 SECRETARY LEWIS: All right. So we're going to,
10 yeah, shift to inert substances in organic pesticide products,
11 a perennial issue for the Board, one that the Board has passed
12 numerous recommendations in the past, and still find ourselves
13 in a -- somewhat of a quandary to move the ball forward. So
14 what I'm going to go ahead and do is do a little summary of
15 what the proposal says, some public comments, and leave
16 significant time for the group to discuss.

17 The Board proposed one proposal with two options in
18 it, and the intention there was to give the Program a spectrum
19 of viable options, as they requested in their memo to us. I'll
20 summarize the motions here.

21 Option one, which is to list each substance currently
22 in use individually. It essentially maintains the status quo
23 in that it codifies the substances that we believe to be in use
24 in organic pesticide products as individual listings on the
25 National List. It allows additional substances to be

1 petitioned for additions or removals. It adds hundreds of
2 individual listings to the National List with all of its --
3 those accompanying sunset burdens. It groups substances by
4 chemical type and use, which can ease the review burden at
5 those sunset reviews. But it is unclear whether the list of,
6 quote, unquote, "in-use inert" is accurate or complete. We
7 obtained that list from disclosures from MROs who register
8 organic pesticides, but it's important to acknowledge that the
9 EPA itself also registers organic pesticide products, and they
10 were not part of that disclosure in the public record. So it
11 is a potential that the list that we're using here for option
12 one is incomplete.

13 Option two is to allow tolerance-exempt inerts with
14 exceptions. This provides manufacturers with more inert
15 ingredient options for formulations. It allows exceptions to
16 be made to this allowance. So, for example, we proposed the
17 prohibition right from the get-go of PFOS and alkylphenol and
18 alkylphenol ethoxylates, as we realized we needed to clarify
19 yesterday.

20 NOSB does not review each substance individually for
21 this initial listing motion. It does not rely on information
22 related to confidential statements of formulas disclosed by
23 MROs, which I mentioned the previous -- in the previous option,
24 it did. And I think, importantly, this proposal does not
25 reference specific regulatory references that may become

1 obsolete, like what we're finding with List 3 and List 4. But
2 it rather references a characterization of substance, that
3 being exempt from tolerance, that ensures only the least toxic
4 substances are allowed for use as inert ingredients in organic
5 pesticide products.

6 A brief summary of the public comments. The trend
7 was that commenters generally reiterated their preferences and
8 opinions on one of the two options. We got to these two
9 options because these were the two options that rose to the top
10 as preferences from the advance notice of proposed rulemaking,
11 the ANPR that the program did on the topic.

12 Some commenters expressed a preference for one option
13 but encouraged the Board to pass the recommendation so we could
14 move to the next phase of rulemaking. There was an elegant
15 suggestion to pull elements from both options to create a
16 hybrid option that references some EPA tolerance exempt lists
17 and lists some substances individually. And then there was a
18 comment suggesting that the review of substances against OFPA
19 criteria included in both options occur simultaneously with NOP
20 rulemaking to pave the way for a well-supported initial list of
21 inert substances and to provide a roadmap and framework for the
22 sunset review that will need to occur, no matter what option is
23 acted on by the Program for addition to the National List.

24 That leads me to some sunset considerations because
25 once we move a proposal forward and rulemaking begins, we will

1 still have some sort of National List item and that will give
2 the Board a job in the future. We will need to review it
3 during sunset. So we talked about what sort of options there
4 were or what sort of approaches there would be for the various
5 option -- for the two options.

6 For option one, sunset reviews could be grouped by
7 substance. We could group the substances by chemical class or
8 use and stagger the review of those substances over the five
9 years to add some efficiency. Option two, the sunset review
10 would largely be focused on identifying additional substances
11 to prohibit in the list of exceptions.

12 Here's the proposal that provides the Program with an
13 a -- with an actual National List motion that they could act
14 on. This is the National List motion for option one, and I
15 didn't want to put all 270 some-odd substances to list
16 individually for the purposes of this, so there's an ellipsis
17 there that references Appendix A, which is a spreadsheet we
18 compiled at the Board to start to analyze the actual individual
19 substances and where they lived in the various regulatory
20 references.

21 Option two is an amendment to the current regulation,
22 which identifies that only inert ingredients that are exempt
23 from the requirement from tolerance can be used, and we have an
24 -- except for with the first two substances, alkylphenol
25 ethoxylate substances and per and polyfluoroalkyl substances,

1 as examples of exceptions that should be included in the
2 initial rulemaking on the topic if this is the option that the
3 Program selects to move forward with.

4 So, like I said, I wanted to be brief so we could all
5 have time to deliberate, and I think with that we'll turn it
6 over. Maybe I'll give Franklin and Brian a chance to kick off
7 the discussion as my co-leads on the topic, and then we'll turn
8 it over to the Board. So, I don't know if Franklin or Brian,
9 you have --- and maybe I'll let -- Brian? Yeah. Oh, and Logan
10 as well. Sorry, Logan, I'm not -- I'm failing as your virtual
11 guardian today, so I apologize for that.

12 BOARD MEMBER PETREY: I have back up.

13 BOARD MEMBER CALDWELL: I want to thank Nate Lewis,
14 who is on every sub -- NOSB subcommittee. He is the hardest
15 working man in show business, and we really appreciate that,
16 and I'm going to save any other comments for when we have our
17 general discussion.

18 CHAIR SMITH: Franklin?

19 BOARD MEMBER QUARCOO: I would like to echo that
20 point, and let's go straight to the discussions. You've
21 covered it all.

22 CHAIR SMITH: Logan, do you have any comments before
23 we open it up?

24 BOARD MEMBER PETREY: No. Thank all three of you for
25 picking up my slack on this. I truly appreciate it, so let's

1 get to discussion.

2 CHAIR SMITH: No one wants to go first. I can go --

3 SECRETARY LEWIS: All right. Should we call the
4 questions?

5 CHAIR SMITH: Brian, go ahead.

6 BOARD MEMBER CALDWELL: Thanks, Kyla. Well, this has
7 been an extremely difficult topic for years for the NOSB, and a
8 need within our farmers and our regulators for improvement of
9 what we -- what we're -- the obsolete list that we're working
10 with now. So really important work.

11 Well, cut to the chase. I think that when we first
12 got this agenda, work agenda item, we were very much encouraged
13 to submit a proposal at this meeting and felt a lot of time
14 pressure. I felt that the normal process of kind of running
15 out a discussion document first and then crafting a proposal
16 would be better.

17 During this meeting, it seems to me that the comments
18 from Dr. Tucker and others seem to indicate that there wasn't
19 such a tight -- that we could decouple our time frame from
20 concerns about when the List 4 inerts would come up for sunset
21 renewal and that sort of thing, but it wasn't a real rush to
22 get this done before that happened. So I really appreciate a
23 lot of the comments, in particular the hybrid one that they
24 mentioned, and I think we can recraft this better, so I would
25 prefer it to go back to the subcommittee. I'm not going to

1 move that right now, but that -- just wanted to lay it out
2 there that that would be my choice, so.

3 CHAIR SMITH: Mindee?

4 BOARD MEMBER JEFFERY: Thank you. This is a -- I
5 just don't think I could say thank you enough or acknowledge
6 the life work of people doing this level of granularity in
7 organic systems and the level of respect I have. But the work
8 that's done here and the way that you're trying to negotiate
9 this collaboration with the Program and live in practical
10 reality and our criteria. And I --- 25 years of talking to
11 customers about what organic means and the collective
12 intelligence in the public atmosphere for the first time this
13 year really dealt with the pain of inerts from a consumer's
14 perspective. There was a substance that came up in the media
15 that was approved for use as a fungicide, but maybe was being
16 used as a fruit coating, and I've never had to explain inerts
17 to my marketing team at Good Earth. And I feel like it's
18 instructive that our collective intelligence is really ready
19 for the -- a depth of review of what we do in the food system
20 that's this -- at this level of looking at the food system and
21 what we do in the food system. And so I think it's important
22 to understand that our criteria do ask us for a deep level of
23 review and for transparency, and I love the National List, and
24 I'm protective of it.

25 And so the pain of being able to explain this to

1 consumers has arrived to us. So I don't know what that means
2 in this context because I do support the work and I do see the
3 compromise and I do see the functionality of giving the options
4 to the program on a time frame and then letting them do the
5 work of how do we deal with interagency work and how do we deal
6 with forward bandwidth. And so I'm -- it's all complicated for
7 me, but I do really support the work that you've done here.

8 And I just wanted to kind of raise the notion that the consumer
9 is starting to digest this level of looking at organic systems.

10 CHAIR SMITH: Allison?

11 BOARD MEMBER JOHNSON: Thank you all so much for
12 taking on this, excuse me, hairy issue. You know, one of our
13 commenters said it's time to unsweep from under the rug, this
14 issue. We've been punting it for too long, so I appreciate
15 that the Program gave us a deadline.

16 And looking back at the Program's memo to the Board,
17 the message was we got 70 percent of the way there through the
18 initial advance notice of proposed rulemaking. And NOP's
19 really looking to us to work on finalizing a solution and that
20 our consideration help -- should help find the best path
21 forward. And they'd like to see a thorough, well-vetted
22 recommendation for rulemaking. I don't think we're quite there
23 yet.

24 I love the effort that has been put in to find
25 something that has kind of pieces for everyone in it that maybe

1 we could move forward. But my day job exists because EPA isn't
2 doing enough to protect us and protect our environment. So for
3 me, option two has too much deference and gives up an
4 opportunity that is really the purpose of organic, to go beyond
5 and make sure we're doing the absolute most we can do to
6 protect human health and the environment.

7 So I'd like to see this go back to subcommittee for
8 one more go-around. I think we've made a lot of progress and
9 we got excellent comments this time too. So we're getting
10 close and I could use another round to get a little bit closer.

11 CHAIR SMITH: Nate?

12 SECRETARY LEWIS: Yeah, I appreciate everyone's
13 comments on this. I think -- I'm trying to collect my thoughts
14 here. I feel like the -- well, let me back up.

15 My background is in material review. So I have sat
16 at the desk and read these confidential statements of formula
17 when I worked for Washington State Department of Agriculture.
18 Franklin, your experience has been testing efficacy of
19 pesticides, so you have a body of expertise that I'm not sure
20 the Board has ever had before.

21 And what I see this proposal do is give the Program
22 the latitude to provide a context that's legal and that's
23 actionable. We've seen through the 2015 recommendation
24 something that we thought was elegant and worked, get to the
25 rulemaking phase and fail. I don't want to repeat that mistake

1 and be 10 years, you know, 2034, and having the same
2 conversation.

3 So my personal opinion is that we should move this
4 proposal forward so that the Program has the latitude they need
5 to create the context that's legal, that's actionable, and that
6 rulemaking can occur in. And then we as a board, leveraging
7 the expertise that we have right now, pivot to the granular
8 review of the substances in anticipation of a sunset review
9 that will occur five years following whatever rulemaking action
10 the program takes.

11 If we delay and wait more, I fear that the expertise
12 that we have on the Board right now will term off. I have
13 confidence that we'll have great folks coming on the Board
14 right now. But the level of commitment that we have right now
15 to seeing the process through is unlike what I've seen before.
16 And so I would like to give the Program some options, encourage
17 them, you know, give them the options they need to move forward
18 with rulemaking, and pivot to granular sunset review of all the
19 substances that either option implicate. And I think in sort
20 of to support that, I kind of want to turn this and maybe do a
21 question to Jenny and the Program about whether or not we can
22 conclude this aspect of the inerts' work agenda item and pivot
23 right up to some sort of, you know, this is clearly an un--
24 crafted question here, but pivot to a review of the substances
25 in anticipation of that sunset. So keep inerts on our work

1 agenda, not sort of wipe our hands clean and turn our head away
2 from it, but, you know, really then get into the granular
3 review details of each type of substance.

4 Can you even understand what I said? I'm sorry.

5 CHAIR SMITH: Yeah, no, I --

6 SECRETARY LEWIS: I really just want to keep inerts
7 on the thing, but pivot from the structure of the rule to the
8 details within the rule.

9 DR. TUCKER: Okay. I'm going to broaden it out a
10 little bit because I hear kind of multiple questions kind of
11 happening about both timing and process. So let's just broaden
12 it out a little bit here.

13 And so first I want to, again, acknowledge how
14 complicated this is, and thank you guys. This is -- you're
15 doing really, really tough work. Lists 3 and 4 have been on
16 the list for, what is it, 20 years? I mean, it's been a long,
17 long time, and so this is no small feat to have gotten here.
18 Right? So good job.

19 Now, the Board is -- had expressed once when they
20 renewed Lists 3 and 4 last time, they said, we don't want to do
21 this again. Right? And so when we wrote the work agenda item,
22 we had kind of done the back calculations on the math of how
23 long it was going to take to do rulemaking, and that's how we
24 arrived at, hey, this is kind of the target meeting. So I do
25 think if it goes back to the subcommittee, we're not going to

1 be able to do rulemaking any faster. Right?

2 Rulemaking is going to take what it takes. So the
3 tradeoff is if it goes back to subcommittee, and I'm not
4 weighing either way here. Right? If it goes back to
5 subcommittee, then the chance of needing to relist 3 and 4
6 again go up. Right? Because we just won't have time to finish
7 rulemaking, and people still need this stuff.

8 So if it passes, so if you vote on it, if it passes,
9 then we would engage in a rulemaking process, which is going to
10 be complicated. We would also recognize it's not -- this isn't
11 just, oh, we did this, go Program, and we're not working on it
12 anymore. You would then need to continue the process to figure
13 out, okay, well, what does sunset evaluation look like? This
14 would remain an active work agenda item because it is so
15 complicated, and there are multiple moving parts.

16 So it would become what we would try and do is not to
17 overlap with each other. You know, once, you know, we can talk
18 -- we're allowed to talk until we publish a proposed rule, and
19 then we can't talk. Right?

20 So we could communicate about kind of how things are
21 going as we're writing a proposed rule. Once a proposed rule
22 is published, we would then go into ex parte, but we would keep
23 an eye on what you're working on to make sure that there aren't
24 conflicts because we don't want anyone, us or you, wasting our
25 time. So we just have to be in close communication of you own

1 this part of the problem, we own this part of the problem, and
2 make sure that when they rejoin someday, that they're
3 compatible. Did that help?

4 SECRETARY LEWIS: That, for me, that reassured that
5 this would not be the end of the inerts' discussion for the
6 board members who are currently on the Board and not terming
7 off here.

8 DR. TUCKER: Yep.

9 SECRETARY LEWIS: And I think that's ultimately what
10 I would love to see happen.

11 DR. TUCKER: I think that a lot of people will have
12 retired, and we're still going to be talking about inerts. I
13 think this is a living topic, right?

14 CHAIR SMITH: Brian?

15 BOARD MEMBER CALDWELL: Yeah. Just a follow-up on
16 that. If rulemaking is going into effect and a new rule is
17 made, undoubtedly there's going to be a phase-in period for
18 this kind of, you know, shift, you know, for the manufacturers.
19 And so I think -- it seems to me that we're going to have to
20 basically re-approve List 3 and List 4 anyways, kind of no
21 matter what happens, and then it will be superseded by the new
22 rule once that comes into effect.

23 DR. TUCKER: Yeah, I think that's probably a valid
24 point. And so I think we've been trying to think through,
25 okay, what are all the different dependencies, and what can be

1 decoupled, what can't be decoupled, and yeah. And we also need
2 to be very, very careful that we're following OPFA, and I've
3 said this before, we can't add synthetic to the National List
4 without a board recommendation.

5 CHAIR SMITH: Mindee?

6 BOARD MEMBER JEFFERY: Thank you. I'm compelled,
7 thank you, for that clarification. I -- I'm not your trust-
8 the-government person, naturally, and this process has taught
9 me that when Dr. Tucker shows you a way through the mountains,
10 get on the path, because that's a broad view. And I do trust
11 this process, I do love this process, and I don't think it
12 always goes the way we want it to, and it's not perfect. But I
13 think that's generally because the tide changes in something we
14 can't control, not because there was a lack of honest effort
15 towards what we said we were going to do.

16 And I feel really good about who you are, Nate, and
17 the collective intelligence that we have on the Board right
18 now, and I think it's a hard one. And so, I just -- I'm
19 uncomfortable, again, in some ways, and I do -- I think it's
20 important to just note that the consumer is starting to look at
21 this issue. And I think because we have interagency issues,
22 and we can't solve problems outside of who organic is, I do
23 trust the process, and I do trust who we are in it. So I'm
24 okay with not going back to subcommittee and working through,
25 and I appreciate the dialogue.

1 CHAIR SMITH: Franklin?

2 BOARD MEMBER QUARCOO: Yeah, the question Nate asked
3 was bothering me, too, earlier today. And the statement from
4 Dr. Tucker makes me way more comfortable with proceeding with
5 a vote on these issues, so I just wanted to say that.

6 CHAIR SMITH: Wood?

7 BOARD MEMBER TURNER: I just have a practical
8 question. So I'm reminded that two years ago we tabled a
9 petition for distilled tall oil, which really factored into a
10 lot of these kinds of issues. And so what happens, I'm not
11 sure if this is a question for Jenny or a question for Nate or
12 a question for Franklin but -- or Kyla, but what happens on
13 that issue, for example? So does that, that's an adjuvant,
14 it's a List 3. It was -- it's on List 3, but anyway, so what -
15 - so let's say List 3 rolls over during rulemaking. I can't
16 even ask the question, but I'm actually just curious sort of
17 what happens on that issue practically? Can somebody address
18 it? I mean, I have no opinion, no horse in the race, the
19 material's not relevant. I'm just curious sort of where that,
20 from a process perspective, what happens there?

21 SECRETARY LEWIS: Yeah, I would, I mean --

22 BOARD MEMBER TURNER: Does it just get pushed off
23 until the rules are developed?

24 SECRETARY LEWIS: Yeah, yeah, I think essentially
25 because it is an inert, being used as an inert ingredient in

1 that case.

2 BOARD MEMBER TURNER: Right. It was applied as an
3 inert --

4 SECRETARY LEWIS: Right. Then if a program moves
5 forward with lists individually and tall oil is on that list,
6 then it would be allowed, or if it moves forward with -- lists
7 individually and it's not on the list, it would not be allowed,
8 and we would take it up probably as a tabled petition. Or I
9 don't know exactly its current status, and if it's included in,
10 if we go with the -- if the rule goes with EPA or some other,
11 anyway, so whatever the rule is that they come out with, if it
12 covers tall oil, it would be allowed.

13 BOARD MEMBER TURNER: Distilled tall oil.

14 SECRETARY LEWIS: Distilled tall oil. And if it was
15 not included in whatever the rule comes out with, we could
16 evaluate it within that context of, you know.

17 BOARD MEMBER TURNER: Okay. Just asking a practical
18 question about how it works.

19 CHAIR SMITH: Amy?

20 VICE CHAIR BRUCH: Thank you so much for the work you
21 guys have done on this really complex issue. I echo many of my
22 board members' comments to you guys. It's incredible work, and
23 the scope of the project was to determine options.

24 Brian, I do have a question for you from a statement
25 that you made kind of closer to the beginning of this question

1 and answer process, but, you know, we have option one, we have
2 option two, we have the idea of hybrid between some of those
3 options. We reconciled public comments. You said there might
4 be something more we can do, but balancing that with
5 Dr. Tucker's big picture macro idea and where we're going with
6 this and then rulemaking, additional public comment round, what
7 more did you think we can do by sending this back?

8 BOARD MEMBER CALDWELL: Yeah, thanks, Amy. Basically
9 my feeling is that what we've got before us today is much
10 better than just continuing with List 3 and List 4. I really
11 appreciate that.

12 But I think that we could essentially make narrower
13 guardrails that the EPA and the NOP could work within if we
14 took -- sent it back to committee and had another stab at it.

15 So I'm uncomfortable with essentially the inerts of -- that are
16 not subject to a tolerance requirement. That -- those lists
17 are a total of something like over 2,000 material substances,
18 and I -- and many of which are not in use right now, but which
19 could be then if that was the way we went forward. And I --
20 I'm not comfortable with all those basically sort of --- I'd
21 like to really limit the universe of materials that can be sort
22 of grandfathered in and then sunset reviewed as time goes on.
23 I'd like to make that list smaller and basically more
24 transparent, you know, and actually spell it out. So that's
25 where I would go with it.

1 CHAIR SMITH: Carolyn?

2 BOARD MEMBER DIMITRI: So I'm a consumer of organic,
3 and I sit in a consumer of public interest seat. I'm an
4 economist. I don't really understand the nuances of inerts to
5 the degree that many of my colleagues do, so I'm extremely
6 grateful for your discussions. I was -- and your work, your
7 hard work.

8 I was really taken by that hybrid proposal that was
9 put forward, which seemed to really balance all of the needs of
10 the community and of organic. And I'm thinking about, as an
11 organic consumer, I don't like the idea of just saying we're
12 going to kind of give our power over to the EPA to decide
13 what's in that list of inerts. So I think sending it back to
14 subcommittee and putting some more work on what these
15 categories should look like would make me feel more comfortable
16 in the process. Thank you.

17 CHAIR SMITH: Logan?

18 BOARD MEMBER PETREY: Thank you. Amy and Brian
19 actually had the debate that I was going to bring up, but Nate,
20 could you just kind of go over, you know, how restricted or how
21 limited we are as we push these options because it is going
22 back to subcommittee to be further worked on. There's still a
23 lot of work to go on here, and it seems like we are just
24 narrowing down the focus because when you first start out, I
25 mean, it was just absolutely the possibility is kind of not

1 endless, but there were so many. So this is just a step
2 forward.

3 And so if you could just go into, you know, with
4 option one, it seems to be very comprehensive, and that we
5 could, you know, alter things there to really satisfy a lot of
6 people. Anyway, if you could just kind of explain, you know,
7 as we go in passing this proposal that doesn't really just
8 prohibit us a lot.

9 SECRETARY LEWIS: Well, yeah, I think what we will
10 need to do as a board is pivot and respond to the rulemaking
11 action that the Program takes. I think they have a lot of
12 legal questions to resolve as they engage in the theory of
13 interagency collaboration on this topic. So I completely
14 understand and respect Brian's reticence to move forward with
15 the bookends being where they are in this proposal and that
16 moving forward with a proposal that has narrower bookends would
17 provide reassurance.

18 I think what I'm advocating for is moving forward
19 with the widest latitude we can possibly stomach, which is
20 this, so that the Program has that flexibility for moving
21 forward with something that's legal and understanding what our
22 role in this is in the process, which is ongoing review of
23 these listings through our sunset process, which is legally
24 mandated and will always be part of our life, to continually
25 move those bookends in. And so it is a little bit of letting

1 the horse out of the barn and following, but I think the nature
2 and unique concerns that are related to inerts, because they
3 are regulated by an agency outside of the USDA, because they
4 are legally protected as confidential statements of formula, we
5 kind of need to approach it in that way. So, you know, I think
6 it's a comfort level question. And I think that's just sort of
7 the way we're going to need to evaluate it.

8 CHAIR SMITH: Allison?

9 BOARD MEMBER JOHNSON: Thank you. I just wanted to
10 build on Brian and Carolyn's responses to Amy and really pull
11 out one thing that Dr. Tucker said, which is that NOP cannot
12 add a substance to the list, a synthetic to the list, without
13 our recommendation. So leaving that option to bookend where it
14 is, I feel, gives them too much discretion.

15 So we're getting closer. I think there is a place we
16 can land where we can find a comfort level with some of EPA's
17 work, but we need to be very careful about where that bookend
18 lies, because that's ceding potential power that we have to
19 keep materials out of organic that we'd like to see kept out.

20 CHAIR SMITH: Brian?

21 BOARD MEMBER CALDWELL: Just another question for Dr.
22 Tucker. Sorry, I always seem to come up with these. But just
23 that we anticipate that there might be legal issues with,
24 especially if we narrow -- if we don't -- if we go back to
25 subcommittee and then narrow the options. You know, if we can

1 foresee that there might be legal issues, basically, that block
2 the entire process. And one of the advantages of going forward
3 now with what we have is that it is a much broader sort of
4 playing field and possibly not -- might not run into the ---
5 gives more options to avoid any legal issues.

6 My question is just if we move forward with a
7 narrower approach and there was some sort of a major
8 impediment, legal impediment, how quickly could we get feedback
9 on that so we could jump back into the fray and, you know, come
10 up with a new proposal? Again, I'm just trying to foresee how
11 this would play out and not give you an option that's going to
12 run into a roadblock and have to come back again.

13 DR. TUCKER: Hold on. I promise I'll answer that
14 question. Okay. I am --- we're not going to do anything
15 illegal in a rule, right? I mean, we just won't.

16 SECRETARY LEWIS: You heard it here first, folks.

17 DR. TUCKER: Thank you. Thank you. I'm here all
18 day. Okay.

19 So, yeah, I think I have not heard concerns with the
20 legality of this proposal, right? We're -- yeah, okay. I
21 think we're more concerned about cost than legality. So
22 that's, for me, the red flag with some of the options being
23 discussed here. The reason -- I know we're coming up on
24 another sunset for nutrient vitamin minerals, NVM. The reason
25 the NVM recommendation from the Board didn't move forward last

1 time, the Board had - so NVM, for those who, you know, maybe
2 weren't around for this, was a listing that the Board proposed
3 a change to the listing, and then we tried to move forward with
4 rulemaking, and it ended up being economically significant.
5 And so the administration at that time decided not to do it
6 because it was going to be so expensive for everybody involved.
7 So it died.

8 So we did an interim final rule, keeping -- I think
9 it was -- I forgot exactly what it was. I think it was an
10 interim final rule that kept the status quo. And it was
11 because of the economics, because it was going to be so
12 expensive for existing product manufacturers to reformulate.

13 I think that's a risk with the topic of inerts here,
14 that because people have now been --- as obsolete as they are
15 -- people have been relying on Lists 3 and 4 for a long, long,
16 long, long time. If whatever you do is going to fundamentally
17 change that and make fewer options available, that's going to
18 have a cost impact likely. So we're more worried about cost
19 than legality.

20 BOARD MEMBER CALDWELL: Yeah, thanks. Just to be
21 more specific -- I realize I was too vague there. The, in
22 option one, we're -- we've got a list of what we think are --
23 is a comprehensive list of the inerts currently in use, and we
24 thought there might be issues with proprietary information
25 between EPA and NOP or something like that, that we -- that's

1 what we foresaw where the issue might be. And so that's what
2 we were concerned about.

3 The -- basically, the way that list was made was that
4 some of the material review organizations gave us a list of the
5 inerts that they had on their materials, but they were not
6 linked to individual products. So that was the individual
7 formulation.

8 DR. TUCKER: Okay.

9 BOARD MEMBER CALDWELL: So that was the way that they
10 felt comfortable in giving us just a sort of generic list of
11 things in use, but not tied to an individual product.

12 DR. TUCKER: Okay. I think I hear what you're
13 saying. In a rule, we -- I mean, I think in the rule, we care
14 about what would actually be listed and the process, the
15 justification of how the Board came to we wouldn't include all
16 of that. We wouldn't include proprietary. I'm not sure I'm --
17 - I want to answer the question, but I'm not quite sure.

18 BOARD MEMBER CALDWELL: So --

19 DR. TUCKER: I mean, people would be able to ---

20 BOARD MEMBER CALDWELL: Yeah. Please, Nate is
21 probably going to be able to do that.

22 DR. TUCKER: Okay. People would be able to comment
23 in a proposed rule on anything they liked or didn't like, and
24 they could use whatever information they had available to them
25 to make that public comment.

1 SECRETARY LEWIS: Sure. Yeah, I think what we've
2 talked about in the little working group on inerts is that that
3 initial list in option one is a list of things we know are
4 included or we have been told are included in proprietary
5 formulas. And so by publishing that list, you're essentially
6 saying all organic pesticides include --- not all, they don't
7 include all of these substances, but these substances are the
8 things that are included in the organic pesticides. So
9 backtracking into people's confidential statements of formula
10 could be more attainable. And the concern is whether that has
11 some impact, you know, or whether EPA and the FIFRA, which
12 governs their work, could sort of intervene and say no, that's
13 not -- that's an issue around confidentiality. And it might be
14 around how this process, like how these rules are vetted with
15 partner agencies like EPA. And --

16 DR. TUCKER: I don't know the answer to the question.
17 I also -- I mean, I think, like option two, right? So let's
18 see. I want to be thoughtful here.

19 Any rule we do will go through interagency review if
20 it is determined to be significant because of the novelty
21 and -- the novelty of this and reference to EPA. It will
22 absolutely go through interagency review. When we did the
23 inerts' ANPR, we actually went to EPA before we even put it
24 into clearance and would likely have those conversations very,
25 very early in the process.

1 BOARD MEMBER CALDWELL: So that's very helpful. So
2 that stage may have already been gone through, but since we've
3 got -- option one was evidently vetted.

4 DR. TUCKER: Well, we put -- so we put the four
5 options into the ANPR that we thought were legally viable. And
6 so we wouldn't have put something in the ANPR that we didn't
7 think was legal either. We did express some preferences in
8 that ANPR in terms of workload and kind of the labor.

9 EPA did weigh in on that. EPA had some thoughts
10 based on their experience on kind of the complexity and
11 problematic nature of some of the proposals in there. But
12 there's nothing in there that wouldn't be legal.

13 BOARD MEMBER CALDWELL: Thank you very much, Jenny.
14 And sorry to drag everybody through the weeds, but really
15 appreciate that.

16 DR. TUCKER: Okay.

17 CHAIR SMITH: I had your name on the list, Amy. Did
18 you still have a -- do you remember what you were going to say?

19 VICE CHAIR BRUCH: Yeah. It was pretty minor
20 compared to what's been discussed here. So I think I'm okay
21 with the current discussion. Thank you.

22 CHAIR SMITH: Are we ready to vote? Allison? Oh,
23 wait. Hold on. Jerry. We haven't heard from Jerry. Go
24 ahead.

25 BOARD MEMBER D'AMORE: Yeah. I believe I'm the first

1 vote. And rather than just spit out a vote, I feel being the
2 first vote that I have to share with you the thoughts that I
3 have. And the biggest thought that I have is that I'm not in
4 your league here. It's way beyond my core competency to weigh
5 in at the level that you folks have been talking.

6 And I'm going to have to use a phrase that I
7 fundamentally really don't like, which is optics. So the idea
8 that we, quote, can't afford the optics is, again, something
9 that I don't pull out of my pocket very often. But on this
10 one, I'm listening to Mindee, and I have read stakeholder
11 comments. And so I'm going to vote yes to this because I don't
12 think we can afford the optics. Thank you.

13 CHAIR SMITH: Allison.

14 BOARD MEMBER JOHNSON: I'd like to move to take the
15 proposal back to subcommittee.

16 CHAIR SMITH: Is there a second? I see -- Carolyn,
17 are you seconding? Okay.

18 Any further discussion on that motion? The vote
19 starts with you, Jerry. The vote is or the motion is to send
20 back to subcommittee.

21 BOARD MEMBER JEFFERY: Sorry. For clarity, is it
22 eight to go back, simple majority?

23 CHAIR SMITH: Yes.

24 BOARD MEMBER D'AMORE: No.

25 BOARD MEMBER DIMITRI: Yes.

1 BOARD MEMBER NANDWANI: Yes.

2 BOARD MEMBER CALDWELL: Yes.

3 BOARD MEMBER JOHNSON: Yes.

4 SECRETARY LEWIS: Sorry, my Excel spreadsheet just
5 broke, so. No, yes, yes, yes, yes. No.

6 VICE CHAIR BRUCH: No.

7 BOARD MEMBER QUARCOO: No.

8 BOARD MEMBER JEFFERY: I worked really hard not to
9 make this moment happen to me on this board. Yes.

10 BOARD MEMBER POWELL-PALM: No.

11 BOARD MEMBER HUSEMAN: No.

12 BOARD MEMBER TURNER: No.

13 CHAIR SMITH: Logan?

14 BOARD MEMBER PETREY: I thought we froze. Like I'm
15 going to have to reboot in and I'm like I'm going to miss the
16 vote. No.

17 CHAIR SMITH: Chair votes no.

18 SECRETARY LEWIS: Five, yes. Nine, no. Zero absent.
19 No, sorry. Zero abstentions. Zero recusals. One absent. The
20 motion fails.

21 (Motion fails)

22 CHAIR SMITH: Yes, Carolyn.

23 BOARD MEMBER DIMITRI: Can we talk a little bit more
24 now that that's behind us? Because I guess, can we talk about
25 the cover letter that might go along with this, which I think I

1 don't feel good taking a vote on it unless we discuss what
2 we're going to put in that cover letter.

3 CHAIR SMITH: Yes. Who wants to address that? Nate?
4 Brian? Franklin?

5 SECRETARY LEWIS: Well, I will share what I think
6 we've sort of talked about in terms of just preliminarily what
7 might go into a cover letter, and then maybe that will be a
8 good foundation for a discussion. I think with the quality of
9 comments that we received at this go-around, we wanted to be
10 clear that the Program -- we didn't want to communicate to the
11 Program that it was an either/or, but that a hybrid approach
12 could be acceptable, or that we were open to the Program
13 looking at all of the recommendations the Board has passed in
14 the past as wells to draw from for rulemaking. So it was more
15 -- it was to communicate that we weren't trying to limit the
16 Program to one or the other as we wrote them, but more to pull
17 good parts out of each and combine them if that is what seemed
18 like the most viable option to them.

19 BOARD MEMBER CALDWELL: I agree, totally. And I want
20 to thank everybody for that wonderful discussion we just had.

21 CHAIR SMITH: Carolyn.

22 BOARD MEMBER DIMITRI: My last comment. So I guess
23 after thinking about, like, the cost implementation, I do have
24 a fear that the final rule will come down to option two because
25 that may be the lowest cost way of implementing this, and I

1 just wanted to say that. I know that's totally out of really
2 everyone's control at this point.

3 CHAIR SMITH: I think we're ready to vote. Is there
4 one more slide here with the -- who has the clicker?

5 SECRETARY LEWIS: Well, it's actually the slide
6 previous and then.

7 CHAIR SMITH: Okay. I just didn't see the motion at
8 the end. Sorry.

9 SECRETARY LEWIS: Yeah.

10 CHAIR SMITH: Okay. So this comes before the full
11 board, motioned out of subcommittee by Nate Lewis and seconded
12 by Brian, to accept the inerts proposal, and the vote starts
13 with Carolyn.

14 BOARD MEMBER DIMITRI: I'll abstain.

15 BOARD MEMBER NANDWANI: Abstain.

16 BOARD MEMBER CALDWELL: Yes.

17 BOARD MEMBER JOHNSON: No.

18 SECRETARY LEWIS: Yes.

19 VICE CHAIR BRUCH: Yes.

20 BOARD MEMBER QUARCOO: Yes.

21 BOARD MEMBER JEFFERY: Yes.

22 BOARD MEMBER POWELL-PALM: Yes.

23 BOARD MEMBER HUSEMAN: Yes.

24 BOARD MEMBER TURNER: Yes.

25 CHAIR SMITH: Logan?

1 BOARD MEMBER PETREY: Yes.

2 BOARD MEMBER D'AMORE: Yes.

3 CHAIR SMITH: Chair votes yes.

4 SECRETARY LEWIS: Okay. Eleven yes; one no., two
5 abstentions. Zero recusals. One absent. The motion carries.

6 (Motion carries)

7 BOARD MEMBER JEFFERY: Just really thank you guys.
8 Good work.

9 CHAIR SMITH: Okay. I feel like we need to all take
10 a deep breath, as Logan reminds us to do, and then exhale, and
11 then I'm going to pass it back to Franklin.

12 BOARD MEMBER QUARCOO: Okay. Now to the final item
13 on our agenda, that's a discussion document on excluded methods
14 by Brian and David.

15 DISCUSSION DOCUMENT: EXCLUDED METHODS

16 BOARD MEMBER CALDWELL: Another tricky issue, but we
17 put out a discussion document about induced mutagenesis, which
18 has been on the TBD list, to be discussed or to be continued
19 list, of excluded methods. So these are -- were items that
20 were sort of like put off of the decision-making process in an
21 indefinite way that may or may not be classed as excluded
22 methods. And our, in particular, our organic plant and seed
23 breeding community has said, just deal with those TBD items,
24 please, so that we can move forward confidently.

25 So the document that we put out focuses on plant

1 breeding, does not cover microbes or animals, and it is based
2 on information from a recent technical review that we put out
3 specifically targeting induced mutagenesis. And we wrote it
4 and described the induced mutagenesis methods in pretty stark
5 terms, noting that highly toxic carcinogenic chemicals are used
6 or high levels of radiation. There's often a 50 percent
7 mortality rate of seeds that are treated with these -- in these
8 ways, and that mutation rates that are produced by this process
9 are often in the range of 1,000 times what happens under normal
10 conditions.

11 And so we wanted to really put it out there that, you
12 know, just lay it out, that this is the kind of set of
13 practices that we're talking about here. But we also
14 noticed -- noted that there's been widespread use of varieties
15 that have originated through induced mutagenesis for over 50
16 years without any clear, obvious health issues or agronomic
17 issues associated with those varieties. Popular crops like
18 pink grapefruit and dwarf wheat varieties originated with
19 induced mutagenesis and many, many others.

20 So we wanted to get input from the community, and we
21 figured we'd stir the pot with this kind of a discussion
22 document and see what we got. And let's see here. We asked
23 three specific questions, and one is, should induced
24 mutagenesis be considered an excluded method? If it is --
25 number two was if it is, how do we deal with this since so many

1 varieties of seeds and plants are already in use? And the
2 third one was, does backcrossing in breeding programs with
3 induced mutagenesis lines reduce the need to class them as
4 excluded methods because that ameliorates the negative -- some
5 of these negative issues that are caused by the original
6 induced mutagenesis event. So backcrossing through multiple
7 generations, we've heard on the order of seven or more times
8 two varieties that are not produced with induced mutagenesis
9 sort of cleans up the genome, to be very crude about it.

10 And we -- I'm not going to go into this in depth, but
11 we received a wide range of answers. People thought about this
12 hard. They ranged anywhere from, why are you bringing this up?
13 The matter's already been settled, to exclude them all.

14 So we've got the range, and but we've also got the
15 reasons behind that, and we really appreciate that. All
16 commenters pretty much agreed that identifying and eliminating
17 varieties currently in use that were derived from induced
18 mutagenesis would be extremely difficult. But some seem to be
19 -- seemed to imply that difficult but possible, and so we can
20 move ahead with that. And several favored grandfathering in
21 varieties that are currently in use that may have originated
22 with induced metagenesis. But then the question is what to do
23 when we move forward, and possibly not allowing any new ones to
24 be produced using that.

25 So that's a summary of what we got. And any

1 questions, comments from the Board? And thank you all for your
2 input.

3 Sorry, Dilip, you want to ask -- Dilip and Mindee, I
4 want to make sure they can add on.

5 BOARD MEMBER NANDWANI: Thanks, Brian. Very well
6 presented. Okay. And really appreciate your time and working
7 on this. Another difficult or challenging topic we have kind
8 of, you know, started looking into that, which is part of
9 excluded methods, and we all know I don't have to go into that
10 detail.

11 I'd like to add just a couple of things, although you
12 have summarized very well. I'd like to add about this
13 technical review on IM was requested in 2023 and finalized in
14 2024. And much of the discussion is based on -- sorry. Okay.
15 Thank you.

16 So much of this discussion is based on the
17 information from the TR which we have presented in the
18 document, which is in the folder, and you all have access to
19 it. So according to the TI, IM is not considered to be a
20 recombinant DNA or GMO technology. However, the criteria for
21 excluded methods goes further.

22 So I'm not going into the detail, but the first,
23 according to the NOP definition on excluded methods, there must
24 be three criteria, and this iron meets the first criteria,
25 which is the methods used to genetically modify the organism,

1 so influence their growth and development. So I'll start here,
2 and then that's the first point.

3 So it appears that IE meets the definition of an
4 excluded method. Okay? Furthermore, it has been documented
5 that organic growers in the U.S. currently use cultivated
6 develop using IM. Researchers claim that gamma-ray induced
7 metagenesis could potentially generate new plant varieties with
8 desirable traits, contributing to crop improvement,
9 agricultural sustainability, global food security, while
10 helping to mitigate existing climate change issues.

11 And lastly, I will just add here, and this is from
12 the document again, the decision to accept or exclude the IM
13 breeding method, therefore, could on one hand limit the range
14 of varieties available to organic farmers, and on the other
15 hand, contradict organic standards while compromising the entry
16 -- integrity of organic products.

17 So we wish to honor organic agriculture, right? And
18 the core values, ecology, health, fairness, and care, so I
19 request input from affected stakeholders, including scientists,
20 policy makers, non-breeders, consumers, and farmers, to ensure
21 transparency with information sharing. So in this room, we
22 have lots of experts, and we'd like to hear from stakeholders,
23 see what they think about this very challenging topic and
24 issue.

25 So if IM is classed as an excluded method, the

1 question arises as to whether and how the many plant varieties
2 produced using it can be identified as, like, brand test to
3 this point. Would it be advisable to grandfather such older
4 varieties for use, perhaps prohibiting them from use in future
5 crosses along with any IEM varieties? These are difficult
6 problems, and we welcome input from all stakeholders on how to
7 best move forward. Thank you.

8 Mindee, you want to add something? A question?

9 BOARD MEMBER JEFFERY: Oh, thank you. I really
10 appreciate the document that you put together. I'm very
11 compelled by the clarity and the fearlessness of speaking to
12 whole plant intelligence and that living seed or tissue may not
13 be treated with chemicals or radiation, and that survivors --
14 seed survivors who have been treated this way have impaired
15 function and may not be able to fulfill their role in a healthy
16 ecosystem.

17 And I think because I'm in my fifth year, I'm going
18 to give myself a little latitude and talk from the depth of my
19 passion for who plants are for us and the sacred trust of being
20 handed seeds such that we can live. And for me, that -- I talk
21 to them. You know, I've moved corn from Marin County to Sonoma
22 County to Minneapolis to Vermont, and every time I tell them
23 where we're going and what we're doing and how it might be
24 different for them and ask them to continue the sacred trust of
25 living in this world together.

1 And then I face the practical reality that we don't
2 really have an infrastructure in our university system that
3 functions at the depth of public trust that it takes to
4 continue to produce resistant varieties in this reality that we
5 live in now. And I think that that's -- I'm so grateful to
6 y'all's expertise in this area and to the work that you do in
7 universities and farming because that's a hard compromise to
8 craft. What do we do with the fact that we live here now?

9 But I think organic has always been the most
10 progressive place in society at answering that question, about
11 being creative about that question, about placing our lives on
12 the line to face that question. And so I don't think you have
13 to proceed quickly through this question. And I think you have
14 to proceed really creatively through that question. And if the
15 only place we can get to is acknowledging what we're up against
16 and indicating that we do love traditional plant breeding and
17 we would like for the infrastructure of our society to support
18 that level of, like, foundational life, then maybe that's as
19 far as you can go because we -- you know, our society might be
20 bigger in this moment than what we can conquer. But I do
21 encourage the intelligence, you know, Logan and Franklin and
22 Dilip and Brian, the folks on Materials, I'm so impressed by
23 the depth of your life work and what you've committed to this
24 conversation.

25 And so I guess I want to give you some real creative

1 latitude here to just, you know, look at what's possible, is it
2 possible, and continue to just make your way through this and
3 sort of apologize for my spiritual view on this one but also
4 encourage you to continue and look for ways that can, you know,
5 wind your way through this and maybe your recommendation on
6 this ends up being a little different than the status quo NOSB
7 organic criteria recommendation, and appreciate the depth at
8 which I know you guys are working on this and that you will
9 continue to do so.

10 BOARD MEMBER NANDWANI: Mindee, very thoughtful and
11 really appreciate your insight. Thank you.

12 CHAIR SMITH: Nate Lewis?

13 SECRETARY LEWIS: Yeah, I -- I'll just be sort of be
14 frank that I remain unconvinced that induced mutagenesis is an
15 excluded method. And I think that while the processes that are
16 used to create these mutations are extreme and certainly, you
17 know, radiation and toxic chemicals are not part of organic
18 systems, I see a lot of techniques in classical plant breeding
19 that you could argue are that way. Hand pollinating tomato
20 plants, for example, inbred parental lines, like there's a
21 bunch of very, very contrived scenarios that we use to get the
22 genetics we need. So I -- I'll just sort of put that out there
23 that I remain unconvinced that IM is an excluded method.

24 And I would encourage, in this work, to consider the
25 ramifications of classifying IM as an excluded method on the

1 rest of the rule. So when we get to handling, I'm going to be
2 presenting on citric acid. Many of the aspergillus niger
3 organisms used in that fermentation process are the product of
4 induced metagenesis. So it's not just ruby red grapefruits
5 that we're talking about. It's potentially all the
6 fermentation products. I think it underscores the need to do a
7 hard look at fermentation and sort of keep the ball rolling
8 there. But if we just limit the focus on this work to the
9 plant varieties that are produced through IM, we're forgetting
10 about all of the other uses of IM in our food system.

11 CHAIR SMITH: Nate Powell-Palm?

12 BOARD MEMBER POWELL-PALM: On behalf of the Board, I
13 want to reject your apology. That I think that that is -- that
14 spirit that you're bringing to this discussion is foundational.
15 I think this is a huge opportunity for us to invite a sector or
16 a subset of experts that I think we experienced with the
17 veterinarians who commented on meloxicam and would love to hear
18 from plant breeders, especially plant breeders who are in --
19 who are trying to do good work in the organic space. And so I
20 think it's going to be on us to reach out to them and involve
21 them in this conversation.

22 As a farmer who is constantly thinking about climate
23 change and needing new varieties, I think that tools in the
24 toolbox are going to be really important. I know that a lot of
25 our small grains breeders have this tool as one of their

1 foundational methods to create new varieties that are adapted
2 to a changing environment. And so I think that I'm very glad
3 that this is in the discussion document form, that we can get a
4 lot more experts in here. But I want to thank you for keeping
5 us grounded in how we're moving forward with this.

6 CHAIR SMITH: Amy?

7 VICE CHAIR BRUCH: Thank you, Kyla.

8 Nate, you said what I was going to say, but just so
9 much better. So thank you, Mindee, for the voice and your
10 perspective on things. It's really important, and this farmer
11 appreciates it.

12 And also to the group that's working on this, Dilip,
13 Brian, Franklin, I know you're leading the charge on that
14 committee. Mindee, it's just really impressive. I just had a
15 comment, not necessarily a question, but I do believe that
16 timing is right. Also on this work agenda item that you guys
17 are working on, and then the one that Carolyn and Allison are
18 leading in CACS, the consistency in organic seed use, they
19 really go hand in hand because when we want to increase the
20 amount of seed, we also need to look at it from a macro view.
21 How is that seed being produced? So I think that having these
22 simultaneous work agenda items is really beneficial.

23 And then I do have some follow-ups in this subject
24 matter that I know I owe Franklin from just the grain space and
25 just a viewpoint on classification. Is this classified as a

1 quote, unquote "conventional practice" in the minds of plant
2 breeders, or do they look at this and define this maybe
3 differently in their world? So I will work on those follow--
4 ups, Professor. Okay. Thank you.

5 CHAIR SMITH: Allison.

6 BOARD MEMBER JOHNSON: At the risk of piling on, I
7 also wanted to offer my thanks to Mindee and Brian and Dilip
8 for continuing to turn this issue over on so many different
9 angles. I mean, excluded methods is getting exponentially
10 harder to track and fit into the framework that we have that's
11 a couple decades old.

12 And so with seed in particular, Mindee, I appreciate
13 you grounding us in the origins of seed, especially as we think
14 about equity and inclusion in organic, the people who have
15 stewarded the literal building blocks of our food system for
16 centuries to get us to where we are today. And having, you
17 know, just the deepest respect for that as we continue to
18 engage in this modernizing world is so important and takes a
19 lot of bravery. I was pulling up this kid's book called Sofia
20 Valdez, Future Prez, that talks about bravery being speaking up
21 even when your voice shakes and you have all these emotions in
22 your head, and you just embody that so beautifully. So thank
23 you.

24 CHAIR SMITH: Okay. Franklin, do you have any
25 concluding words?

1 BOARD MEMBER QUARCOO: Yes, I do. So I would like to
2 thank the members of this committee that have worked so
3 tirelessly on these topics. When I first got on this board, it
4 was like a deer in the headlights kind of thing. You
5 understand the scientific basis of aspects of the work, but
6 when it came to policy procedure and stuff, and of course we
7 had orientation, but Mindee noticed pretty quickly that I
8 needed help. So she kept helping me. So if I have a question,
9 I call her. I just say, this sounds good to me. And then she
10 explains to me, oh, this is the procedure. I say, okay.

11 And just when I feel like I've figured it out, I try
12 to do something. I call her. Well, that's not the proper
13 procedure. So first of all, I'd like to say a big thank you to
14 her.

15 And Wood has mentored me on this subcommittee. He
16 was the former chair, and I call him often. So Wood, Kim,
17 Mindee, Nate, Jerry, I've learned a lot from all of them. I'd
18 like to thank everybody, and those who are leaving.

19 I want to re-echo what Nate said about an expert
20 panel. We need one of these for this particular topic. So
21 they come in, and then we all talk about how to deal with this.

22 And then I also want to thank Dr. Tucker for coming
23 up here to tell us about how it's come to her attention that
24 some of these SOE and things that we are doing are impacting
25 small-scale, limited-resource farmers and how an attention to

1 this -- setting procedures can help alleviate that problem.
2 And so, I'm very grateful for the Program paying attention to
3 that. That's about all I have to say. Thank you.

4 CHAIR SMITH: Okay. Awesome work, Materials
5 Subcommittee. I, yeah, as has been said by many, this
6 subcommittee does not shy away from the hard topics at all.
7 And I really commend, I am on the committee as well, but I
8 commend us all for tackling these hard topics with tremendous
9 respect of everybody's positions. And I think that showed in
10 the inerts discussion. And so I just wanted to give a shout-
11 out to everybody on that subcommittee for shepherding us
12 through that and for all the board members for just, yeah,
13 showing up with your respect of everybody.

14 So, okay. With that, we're going to take a ten-
15 minute break. So we'll be back at about, yeah, five after the
16 hour.

17 (BREAK)

18 CHAIR SMITH: We need some more board members. Okay.
19 Welcome back from the break, everybody. We are in the
20 homestretch. We are -- we've made it to Handling. And so I'm
21 going to turn it over to Allison, who is the Handling
22 Subcommittee Chair.

23 BOARD MEMBER JOHNSON: Oh, I have to click. Can I
24 just leave it there? Okay.

25

HANDLING SUBCOMMITTEE

1
2 BOARD MEMBER JOHNSON: Hi, everyone. Good morning.
3 We have a really long list of handling sunsets to move through
4 today. And we're going to use our summarized sunset process
5 for many of them to make sure we have plenty of time to have
6 discussion where it's most needed. But because of that, I
7 wanted to talk a little bit at the outset about the Handling
8 Subcommittee's process.

9 Yesterday, Carolyn -- I hope it's okay that I'm
10 saying this -- Carolyn came up to me after the alkylphenol
11 discussion and said, Allison, you know chemistry? And I
12 laughed because it's a long time ago, but I do have nutritional
13 sciences and gastronomic sciences degrees where I got a very
14 solid grounding in science that's relevant to our work here.

15 And in reflecting on that, I realized that my career
16 is actually an example of the layers of work that go into our
17 sunset reviews. We look at the science on how materials behave
18 in our bodies and the environment. We look at how those
19 materials can be used in food products, what they make possible
20 and at what cost, and then we apply law and policy to make a
21 judgment about what to do with those facts. And that judgment
22 is ultimately what determines the substances that are going out
23 into our world.

24 So this board has an incredible breadth and depth of
25 experience to apply to these discussions, and our structure is

1 really designed to make sure we can bring different
2 perspectives and examine these materials from every angle. So
3 I mean, now we have the benefit of looking back at the judgment
4 of several boards for a lot of these materials, which helps us.
5 And we have an obligation to give each material a fresh look.

6 So I want to offer my deep appreciation to our
7 outgoing subcommittee members, Kim and Wood and Jerry, as well
8 as Nate and Mindee and the rest of the subcommittee, to
9 appreciate the effort that you've put into your work on the
10 Board and the modeling that's happened for those of us who
11 follow in your footsteps. I hope we'll be successful stewards
12 of the Board and carry that knowledge forward.

13 I also wanted to send some really deep appreciation
14 out there to the audience and to our long-term stakeholders who
15 hold the institutional knowledge that helps us move forward.
16 There are folks who have been examining these materials for
17 decades now and make a point of showing up every time,
18 educating each new board, and helping us continue to examine
19 the impacts of our decisions. So you're going to hear us move
20 fast at some points today, but I think that's really reflective
21 of the quality of the information we've had in front of us and
22 our confidence that we've given each and every one of these
23 materials a robust review over the course of the year.

24 So with that, we are going to start with a couple of
25 proposals, then a discussion document, and then jump into the

1 final sunset marathon of the week. And we're going to start
2 with Carolyn on the potassium phosphate petition.

3 PROPOSAL: Potassium Phosphate - Petitioned

4 BOARD MEMBER DIMITRI: Great. Thank you, Allison.
5 So I want to just talk to you first about how we went about
6 writing this proposal. So when we received the petition, we
7 first reviewed it. We talked about it in subcommittee. And at
8 that point in time, Heather, our food tech -- food
9 technologist, sorry, and I sat down and we kind of strategized
10 about where she might be able to put some more depth into this
11 proposal that I'm unable to do. So while the thought behind
12 all of this comes from me and from the committee, Heather did
13 put together that amazing list for us about all the places that
14 potassium phosphate, and all the alternatives. That gigantic
15 table at the end, which I never would have done because I would
16 have thought it was inefficient and a waste of my time. So I
17 guess I wanted to just point that out that we are trying to
18 think of different ways to work with Heather and keeping in
19 spirit of maintaining our integrity in our process and using
20 her knowledge, which is very complementary to the kind of
21 knowledge that I have as an economist.

22 Okay. So this petition is for a product that's
23 already on the National List, and the petitioner wanted to
24 change the annotation. And so currently, it is -- you can use
25 it on products that are labeled "made with organic," but you

1 can't display the organic seal on products that have this
2 material in it. And so we -- there is a TR, so we didn't get
3 another TR. And then there was a 2016 discussion document that
4 was called -- is called the Cumulative Impact of Phosphates in
5 Organic Food. And that document highlighted all of the
6 concerns that the NOSB had with phosphates in our food system.
7 And so you can take a look at that if you wanted to.

8 And so then there was a vote to leave potassium
9 phosphate on the list with the annotation in 2021. So
10 basically what I did at this point in time is I saw the
11 concerns that the previous board had, and I wanted to see if
12 there was any new research. Did anything change out in the
13 state of science or knowledge about this product? And so using
14 my excellent researching skills, I spent a lot of time looking
15 through the peer-reviewed literature, and there was one --
16 basically one publication that was co-sponsored in part by the
17 petitioner.

18 And I looked to see if there were any other
19 publications, and so that would be from about 2016 or 2017.
20 And anything that had come out with potassium phosphate or
21 phosphates, everything else pointed to problems, health
22 problems that result from consumption of this product, except
23 for this one paper. And so we decided, after a fairly lengthy
24 conversation in the subcommittee, that that was not an adequate
25 change in the state of knowledge or the science or our

1 understanding about the health benefits or the reduction in
2 health harm from this product. And we are suggesting that we
3 do not change the annotation and maintain its use only for
4 products that are made with organic ingredients and to continue
5 disallowing this product in agricultural products labeled
6 organic.

7 So the public comments: we had three commenters that
8 were neutral about it, one that supported listing it, plus one
9 more from the petitioner, but I figure they don't get an extra
10 vote because they have the petition, and then four comments
11 that opposed the petition. And so I guess like, in the end, I
12 think the science just still is supportive of serious concern
13 about phosphates in the diet of consumers, and we did not feel
14 comfortable allowing organic -- the organic logo being used on
15 products that had this material. So I think that's us. So
16 I'll open up the floor for just questions or discussion at this
17 point in time.

18 CHAIR SMITH: Thanks so much for taking this on,
19 Carolyn, and for the overview. Questions? Discussion? Nate?

20 SECRETARY LEWIS: I sometimes think about the "made
21 with product" as kind of a barrier to markets for ingredients,
22 so I think about it in terms of sulfites in wine, for example,
23 that without the seal, we -- there's less incentive to
24 transition acres of grapes, for example, to engage in the wine
25 industry. Did you have -- were the types of products that this

1 would be used in, does that sort of close the door on some
2 markets that would be substantially impactful to kind of our
3 landscape of agriculture?

4 BOARD MEMBER DIMITRI: I -- it's my understanding
5 that this product is mainly used in processed foods, and so if
6 you look at that list at the end, there are other products that
7 I think can substitute for it, and so it should not -- I mean,
8 I don't see that as a barrier.

9 SECRETARY LEWIS: But no real direct link, as in the
10 case of like sulfites in wine, for example?

11 BOARD MEMBER DIMITRI: Yeah, no.

12 SECRETARY LEWIS: Okay. Okay.

13 BOARD MEMBER DIMITRI: Because, yeah, that seems to
14 be more clear. Sulfites, wine, grapes.

15 SECRETARY LEWIS: Yeah, totally.

16 BOARD MEMBER DIMITRI: I don't know how you -- yeah.

17 CHAIR SMITH: Mindee, you have a question on your
18 face.

19 BOARD MEMBER JEFFERY: What did you say, Nate? Nate,
20 what's your problem with the "made with?"

21 SECRETARY LEWIS: It -- I just know that what I have
22 been told is that the prohibition on sulfites in wine or the
23 limitation of sulfites in wine to the "made with" category
24 means there is less demand for organic wine and so less of an
25 incentive for growers to convert their acreage of wine grapes

1 to organic. That it -- this is a -- that it is impeding that
2 conversion.

3 BOARD MEMBER JEFFERY: I don't know if I'm right
4 here. I'm just going to say it. I feel like the "made with"
5 category makes it so more people grow organic grapes because
6 they can be 70 percent and so there are fields of organic
7 grapes but maybe not as much certified organic at the USDA-
8 level grapes, but there's a progressional positive there.
9 Maybe I'm wrong.

10 SECRETARY LEWIS: Yeah, you can take it off.

11 BOARD MEMBER DIMITRI: As someone who answered this
12 question pretty much every day in my certification days, wine
13 is pretty unique because you can't have the same agricultural
14 and non-agricultural ingredient in a product, so made with
15 organic grapes wine has to have 100 percent organic grapes. So
16 maybe not quite the apt analogy here, but I hear what you're
17 getting at, which is opening up this material to the organic
18 category, a way to drive an expansion of the opportunities
19 available to organic producers or not. And I agree with
20 Carolyn's response that there are enough alternatives to this
21 particular material that the limitation is not holding anyone
22 back or the impact is very limited.

23 And in this case and a few others that the committee
24 has looked at, the "made with" category seems to give people
25 some comfort with materials that are kind of on that -- in that

1 cuspy place where we have some concerns about use, so we want
2 it to be kind of disincentivized or discouraged, but we want it
3 there if you really, really need it. So here the "made with"
4 annotation kind of strikes that balance.

5 BOARD MEMBER JEFFERY: But if I'm hearing you
6 correctly, the concern is still for not listing?

7 SECRETARY LEWIS: Yeah, my question was aiming at if
8 -- does this, you know, put a barrier? Does this put a further
9 disincentive for people to transition their acreage to organic?
10 And it does not appear as though it does.

11 CHAIR SMITH: Yeah, thank you for the question and
12 the follow up. Any other discussion, Carolyn? Taking the
13 reins or wanted to talk?

14 BOARD MEMBER DIMITRI: No, I was going to move to the
15 vote.

16 CHAIR SMITH: Okay. There is a motion that comes
17 from subcommittee to the full board. The motion is to remove
18 the annotation restricting the use of potassium phosphate to
19 made with organic ingredients and to add an "s" to phosphate,
20 so it would become phosphates at 205.605(b). The motion was
21 made in subcommittee by Carolyn, and seconded by Jerry, and I
22 think the vote is starting with Dilip.

23 BOARD MEMBER JOHNSON: Kyla, can I -- just since
24 we're jumping between sunsets, and this is sort of confusing
25 because it's on the list, but it's not a sunset. So a yes-vote

1 would change the current listing to what's listed on the
2 screen. A no-vote maintains the status quo on the current
3 listing of potassium phosphate.

4 CHAIR SMITH: Yes. Thanks for the clarification.

5 BOARD MEMBER NANDWANI: Yes.

6 BOARD MEMBER CALDWELL: No.

7 BOARD MEMBER JOHNSON: No.

8 SECRETARY LEWIS: No.

9 VICE CHAIR BRUCH: No.

10 BOARD MEMBER QUARCOO: No.

11 BOARD MEMBER JEFFERY: No.

12 BOARD MEMBER POWELL-PALM: No.

13 BOARD MEMBER HUSEMAN: No.

14 BOARD MEMBER TURNER: No.

15 CHAIR SMITH: Logan?

16 BOARD MEMBER PETREY: No.

17 BOARD MEMBER D'AMORE: No.

18 BOARD MEMBER DIMITRI: No.

19 CHAIR SMITH: Chair votes no. Carolyn, I just saw an
20 indication from Dilip that --

21 BOARD MEMBER NANDWANI: So I wanted to say that, like
22 you clarified, but I think I understood otherwise, so can I say
23 no?

24 BOARD MEMBER POWELL-PALM: Heck, yeah.

25 SECRETARY LEWIS: The correction's reflected, so I

1 have zero yes, 14 no, zero abstention, zero recusals, one
2 absent. The motion fails.

3 (Motion fails)

4 CHAIR SMITH: Thank you. Okay. Moving right along
5 to our next proposal, which is another reexamination of an
6 existing listing for L-Malic acid. And before I kick it over
7 to Nate, I'll just start by saying this is very confusing, so
8 pay close attention. Ask good questions. We're here to walk
9 everyone through it as necessary. But I think where the
10 subcommittee landed is in a good place.

11 PROPOSAL: L-malic Acid Reclassification

12 SECRETARY LEWIS: Okay. So, yes, this is a .. Allison
13 was like we are not doing this one after lunch, because no one
14 is going to follow. So, like, we're going to get you while
15 you're fresh. This is a little bit mental gymnastics and
16 indulge me for the deep dive into material classification world
17 here.

18 I also wanted to acknowledge that this is hopefully
19 crossing something off the list. So, Amy, I think you'll be
20 happy that if we can get this one done, that would be good.
21 We'll have less on our to.do agenda.

22 So we're going to be talking about the
23 reclassification motion of L-malic acid. This has been kind of
24 an ongoing issue with the Board, and it's been looked at a
25 number of times. And so maybe we can get it across the finish

1 line with this round.

2 Okay. So L.malic acid is an ingredient used in
3 organic processing. I won't kind of -- we'll -- I'll go into
4 the -- some details when we do the sunset review of it, which
5 is later on in the agenda. But we're going to just focus on
6 the production of the substance and talk about its
7 classification.

8 So, generally, L.malic acid is made through a two.step
9 process. First step is the production of fumaric acid. That
10 fumaric acid can be made either by fermentation or by chemical
11 synthesis. A product of -- if it's made by fermentation, that
12 fumaric acid is nonsynthetic. If it's made by chemical
13 synthesis, it is a synthetic version of fumaric acid.

14 Now, step two is that we take this fumaric acid,
15 whether nonsynthetic or synthetic, and run it through what I
16 now know is a distinct process from fermentation, an enzymatic
17 conversion of fumaric acid, and that's what results in L.malic
18 acid. So when we take nonsynthetic fumaric acid and
19 enzymatically convert it to L.malic acid, that would be a
20 nonsynthetic version of L.malic acid. If we take a synthetic
21 version of fumaric acid and enzymatically convert it to L.malic
22 acid, that would be a synthetic version of L.malic acid. I
23 think we got that one, right?

24 Current reality: L.malic acid is currently listed at
25 205.605(a), which is our list of nonsynthetic, nonagricultural

1 ingredients used in processed products. So it's classified by
2 it being listed here as a nonsynthetic substance. My
3 understanding is it was listed there originally because the
4 previous analysis concluded that any product of enzymatic
5 conversion resulted in a nonsynthetic product.

6 I want to acknowledge that we have 25 years of
7 classification experience under our belt. We have become more
8 nuanced and sophisticated in how we look at substances. So
9 that may have been incorrect classification at the time. I
10 want to put the word "may" there because I wasn't in the room,
11 kind of in the minds of the folks doing that.

12 Also, our current reality is the majority, maybe all,
13 it's hard to kind of get a full sense of what the industry
14 looks like, but certainly the majority of L.malic acid used in
15 organic processing is the product of enzymatic conversion of
16 synthetic fumaric acid. Therefore, meaning the L.malic acid
17 used in organic processing right now, the majority of it is a
18 synthetic substance according to the previous slide and our --
19 the way we would classify that substance.

20 So what's the proposal? The proposal is to classify
21 L.malic acid, that is, the product of enzymatic conversion of
22 synthetic fumaric acid as synthetic, and to add this synthetic
23 L.malic acid to 205.605(b). I want to acknowledge that the
24 proposal described all this and used the proper terms,
25 enzymatic conversion, all those sorts of things. And then

1 because I thought enzymatic's conversion and fermentation were
2 synonyms -- this actually goes back to an ongoing thing I have
3 with my daughter that there are no two true synonyms.

4 Synonyms do not exist. I think it's kind of an
5 interesting thought experiment if you all are looking for
6 something to talk about on the plane, that you sort of develop
7 nuances between what you think are synonyms and there actually
8 might not be a true synonym out there in the world, but that's
9 beside the point. It was an error, and what and we heard great
10 comments from experts in the field about how we needed to
11 evaluate this, and so the proposal -- I'll get to public
12 comments. I guess this is a good segue.

13 There's general consensus that enzymatic conversion
14 of synthetic fumaric acid results in a synthetic version of
15 L.malic acid. I don't think that's necessarily the concern
16 about this particular substance and this reclassification. So
17 if you start with a synthetic substance, there's no way to go
18 back to non-synthetic. You start with synthetic, enzymatic
19 conversion, fermentation, whatever it is, some biological
20 process; it's still synthetic at the end of the day.

21 We did have a little bit of disagreement about
22 commenters and sort of how we take the next step forward. The
23 classification motion, I think, is pretty much settled, but
24 whether or not we should add it to the list now or we should
25 wait for a petition to come in to put it to the list. And

1 there was definitely some commenters that expressed concern
2 that there could be an unintended precedent sort of in the we
3 don't know, we don't know approach, like, you know, how does
4 this impact other products of fermentation or enzymatic
5 conversion on the National List. However, in this proposal,
6 and my opinion, is that we should codify that the synthetic -
7 the enzymatic conversion of synthetic fumaric acid results in a
8 synthetic L.malic acid and that we should add this substance to
9 the National List to add clarity.

10 The product's already in use in organic processing in
11 its synthetic form and we should retain the nonsynthetic
12 version on 605(a) so that should a nonsynthetic version be
13 commercially available, it could be an allowed ingredient. If
14 we remove it from 605(a), then you would infer that the
15 nonsynthetic version would now be a not-allowed ingredient. So
16 this proposal, should it go forward, would result in L.malic
17 acid existing in both 605(a) and 605(b) and sets up the stage
18 for a nonsynthetic version to be used in production and would
19 better reflect what is actually happening in the marketplace.

20 So with that, I would be happy to untangle any
21 threads that aren't straightened out.

22 CHAIR SMITH: Amy?

23 VICE CHAIR BRUCH: Nate, on my end, no untangling
24 necessary. That was very clear. I appreciate your
25 articulation of the subject matter and I also appreciate

1 stakeholder comments on this subject matter. On the outside
2 looking in, it looks a little complicated, but what you
3 described is very, very clear. Thank you.

4 CHAIR SMITH: Logan, go ahead.

5 BOARD MEMBER PETREY: Hey, thanks. I figured I'd go
6 ahead and mention it here while we're in discussion instead of
7 in the sunset. So there -- I have potassium iodide, and there
8 were public comments just saying that it's mostly produced as a
9 synthetic, yet we have it listed in the nonsynthetic bucket.
10 But this is kind of the same thing, but iodine is -- iodine,
11 excuse me, is in the vitamins and the minerals. And I just
12 wondered, do you think that they need to be listed, like some
13 of the commenters have said, specifically in 205.605(b), or do
14 you think that it's fine in the bucket that it is?

15 SECRETARY LEWIS: Related to potassium iodide or --

16 BOARD MEMBER PETREY: Yes.

17 SECRETARY LEWIS: Yeah, I don't know.

18 BOARD MEMBER PETREY: Okay.

19 CHAIR SMITH: I can try and answer.

20 SECRETARY LEWIS: Yeah, that's a good question. I
21 think we should tackle that in that context, yeah.

22 BOARD MEMBER JOHNSON: Okay. I can answer that,
23 Logan.

24 BOARD MEMBER PETREY: Yeah, thank you.

25 BOARD MEMBER JOHNSON: Okay. Sort of explaining my

1 journey on this material and what that journey would need to
2 look like for another material, I think. So really appreciate
3 you taking this on, Nate, like wrapping your head around it and
4 bringing us along with you.

5 Initially, when Nate brought this material to the
6 subcommittee, I heard synthetic fumaric acid, product of fossil
7 fuels, new thing. I was pretty concerned. And what I came to
8 understand is that the Board's original recommendation to add
9 L-malic acid to the list covered the synthetic material. It
10 really was like the wonkiest of confusion points that it ended
11 up listed as the nonsynthetic, and this proposal aligns the
12 current listing with what the Board originally intended to be
13 allowed. So I think that puts us on really comfortable footing
14 and gives us the tools that we need to correctly review both
15 versions of this material going forward.

16 It doesn't seem like the perhaps accidental listing
17 of just the nonsynthetic has driven market availability. The
18 synthetic version remains the predominantly available type, and
19 the decision to add the synthetic to the list isn't allowing
20 something new in. It's a correction. So I think in the case
21 of other materials, we'd want to look at how that listing
22 landed where it is, why, what the implications would be of a
23 change in how it's listed. Like it really takes a case-by-case
24 review in understanding the long and windy path that each of
25 these materials has come before us.

1 BOARD MEMBER PETREY: Sure. Thank you.

2 CHAIR SMITH: Mindee?

3 BOARD MEMBER JEFFERY: Thank you. I am compelled by
4 the public comments that were clear that this substance might
5 need us to make some decisions about fermentation. I think
6 there's some classification issues here and some precedents
7 here and some technical corrections, and I need to see that in
8 a document, and I need to really be able to think about it and
9 process it and, like, make sure I'm making a decision I'm
10 really clear about. There's so many details here spreading
11 across so many areas. I'm really not comfortable making a
12 decision like that. And so I'm really happy to go back to
13 subcommittee, and I will make that motion, but I can hold off
14 for a minute if we want to discuss more, if anybody wants to
15 bounce back on me. But with this many questions in front of
16 us, I think we need to be really thoughtful, and I think we
17 have a lot of unresolved issues, and we might be able to unpack
18 them out loud. But I need to unpack them over six months and,
19 like, think about it and, like, be able to really understand
20 all the weeds of this one, and there's too many for me.

21 And so thank you for the work on this. I really
22 appreciate the work agenda and the annotation change process
23 and how that gives us the latitude to do some fixes, but I
24 think we need to be a little bit more metered about how we go
25 about representing them in the document so that when we arrive

1 at public comments, I'm not trying to figure out so many
2 difficult issues. As a board member, that is in my moral
3 compass, that I need to understand it better to move forward.
4 And so thank you for the work that you're doing. And I also
5 feel compelled by this reality that you can accomplish this in
6 your board term, and so I don't feel like there's a pressure
7 there for me.

8 BOARD MEMBER JOHNSON: Thank you, Mindee. That's a
9 theme that I'm hearing come up more than I'd like to at this
10 meeting, so I'll really take your point. On the other side of
11 it, it's easy to sort of fall into, I understand it, so you
12 should too, so hearing where we fell short of that goal and
13 didn't connect the dots is really important. Thank you.

14 Kim?

15 BOARD MEMBER HUSEMAN: Thank you. Mindee, if I'm
16 hearing you correctly, the fermentation process through the
17 front end of the production of ethanol in a renewable fuel
18 source by using the thin stillage to create L-malic acid is --
19 has some question marks.

20 BOARD MEMBER JEFFERY: I have to read all of that. I
21 have to sit down. I have to read it. I have to follow the
22 process. I need to be able to cross-reference the public
23 comments such that my -- it really lands on me on the
24 understanding not only of the implications for this substance,
25 but for larger issues like fermentation and for other

1 substances because that's the level at which I have to work, to
2 have these kinds of conversations and feel good about my votes
3 because it's not in my wheelhouse of expertise to be able --
4 you know, I wish I could rattle off technical corrections in
5 the depths of fermentation like some people can, and I'm glad
6 our stakeholders can, but I think we have to represent it that
7 clearly in the proposals.

8 And it's -- and to me, there's a risk to going to
9 write this at depth for the public record and for the public
10 process. And that's the only reason for me in that I can see
11 the general agreement about the reclassification issue and
12 appreciate it, but there's some real depth here, and I want to
13 hear the fermentation process in a way that I can step my way
14 through it really carefully as I read through a document.

15 BOARD MEMBER HUSEMAN: Yeah. And I can acknowledge
16 that and say the way that it's written here and understanding
17 it actually, the ethanol process -- in a previous life I might
18 have been very keenly into that space -- so I can see where
19 that's very truncated in this statement and can be expanded on
20 through that process.

21 BOARD MEMBER JOHNSON: Yeah, I think it's a good call
22 to action along the lines of some of the public comments that
23 we heard, but doing our best to be concise, clear,
24 understandable to anyone from any background is one of our jobs
25 here, so it sounds like we may have fallen short here.

1 SECRETARY LEWIS: Mindee, you make a really
2 compelling case, and just to add on to that, I think what a
3 better opportunity to onboard five new members, but with a
4 classification decision like this.

5 BOARD MEMBER JEFFERY: Well, what a better
6 opportunity to train new board members than the opportunity we
7 have to clean up the National List?

8 SECRETARY LEWIS: 100 percent.

9 BOARD MEMBER JOHNSON: Yeah, and where we are doing
10 cleanup, we're pulling at breadcrumbs that were not there and
11 trying to make sure that they're clear in 30 years, so that's
12 part of the job. Any other discussion?

13 BOARD MEMBER JEFFERY: I'm going to motion back to
14 subcommittee.

15 BOARD MEMBER POWELL-PALM: Beat you.

16 CHAIR SMITH: For the record, Nate Powell-Palm
17 seconded that motion. Okay. So the motion is to send it back
18 to subcommittee, and the vote starts with Brian.

19 BOARD MEMBER CALDWELL: I can't believe this is
20 starting with me. I abstain.

21 BOARD MEMBER JOHNSON: I can acknowledge where we
22 fell short. Yes.

23 SECRETARY LEWIS: Sorry, broken Excel spreadsheet.
24 And yes.

25 VICE CHAIR BRUCH: Yes.

1 BOARD MEMBER QUARCOO: Yes.

2 BOARD MEMBER JEFFERY: Yes.

3 BOARD MEMBER POWELL-PALM: Yes.

4 BOARD MEMBER HUSEMAN: Yes.

5 BOARD MEMBER TURNER: Yes.

6 CHAIR SMITH: Logan?

7 BOARD MEMBER PETREY: Yes.

8 BOARD MEMBER D'AMORE: Abstain.

9 BOARD MEMBER DIMITRI: Abstain.

10 BOARD MEMBER NANDWANI: Yes.

11 CHAIR SMITH: The Chair votes yes.

12 BOARD MEMBER JEFFERY: Thank you.

13 SECRETARY LEWIS: Eleven yes, zero no, three
14 abstentions, zero recusals, one absent. The motion carries to
15 send the proposal back to subcommittee.

16 (Motion carries)

17 CHAIR SMITH: Thank you, Nate. Maybe we didn't need
18 to do it before lunch, but we got somewhere in any case.

19 Okay. So moving right along to our last non-sunset
20 agenda item, we're going to go back to Nate when he's done
21 citing/fixing Excel for a discussion document on ethylene,
22 which is petitioned for a change in annotation.

23 DISCUSSION DOCUMENT: Ethylene - Petitioned

24 SECRETARY LEWIS: Okay. So this is a discussion
25 document. We received a petition related to ethylene and

1 adding a different -- an additional use to its current
2 allowance at 605(b), which is currently used in the post-
3 harvest ripening of tropical fruit and de-greening of citrus.
4 The petitioned use for ethylene was to include sort of the
5 opposite effect, which is sprouting inhibition on organic
6 potatoes and onions.

7 We did order a limited scope TR because we have spent
8 a lot of time evaluating ethylene generally, but we asked for a
9 limited scope TR related to ethylene's use specifically within
10 potato and onion crops. We asked stakeholders a series of
11 questions, which I believe are on the next slide, so just about
12 whether or not ethylene should be considered differently
13 because of its use in this, in terms of extending storage life
14 versus encouraging ripening.

15 We asked a question related to the alternatives,
16 which are natural, so currently sprout inhibition is done with
17 clove oil as a popular substance. There is concern about its,
18 that natural substance risk for workers and its lack of
19 effectiveness, so it sort of poses an interesting juxtaposition
20 where there's potential for a synthetic substance to actually
21 be a better alternative to the natural one that we currently
22 have in use.

23 And then I just wanted to reflect on previous boards'
24 work on ethylene and the tropical fruit annotation being
25 somewhat problematic about whether or not tropical means grown

1 within 23 1.2 degrees north and south around the equator, or
2 does it mean fruits that usually grow there, or what about
3 avocados in California, are those tropical fruits? So I think,
4 you know, the petition gives us an opportunity to explore the
5 annotation holistically.

6 We did receive general support for adding the
7 substance to the list from organic spud and onion growers. Oh,
8 I should say in Washington we call them spuds, so just a little
9 vernacular there. Learned some interesting dynamics about the
10 industry where in onions, for example, they're less concerned
11 about extending shelf life because each region that provides
12 onions to the market kind of has their window, and they've
13 tried not to step on each other's toes so they can kind of keep
14 their production in line, so they're more interested in its
15 potential reduction in cullage, whereas potato growers or spud
16 growers are certainly more interested in seeing how much longer
17 they can keep their spuds in condition that's suitable for
18 market.

19 So we're going to keep working on this. We're going
20 to analyze the information we received back in the limited
21 scope TR, and we should have a proposal for this one in the
22 spring.

23 CHAIR SMITH: Thank you, Nate. I see Nate and then
24 Kayla and then Amy.

25 BOARD MEMBER POWELL-PALM: I was just hoping to see

1 in the write-up it says that you interviewed organic potato and
2 onion growers. Could you talk a little bit about that process?
3 I think it's something really exciting for us all to be doing
4 more of, reaching out to those who could use this material.

5 SECRETARY LEWIS: Yeah, I kind of raised my hand for
6 this because Washington State is, you know, I mean, I think
7 we're -- I always try to like highlight when we're number one
8 and above California, you know. So like we can go like go down
9 the list, but like apples, pears, cherries, you know, yeah, I
10 see some Californians in there grimacing. But anyway, it's
11 nice to be on this side of the aisle.

12 Anyway, we grow a lot of potatoes. We grow a lot of
13 onions. And I, through my work just in the organic industry in
14 Washington, do have connections with the Pacific Northwest
15 Vegetable Growers Association, the Washington Potato
16 Commission. And so I've reached out to them about, you know,
17 who, you know, can you connect me with some growers who are in
18 the space and store and sell onions and potatoes. And so that
19 was just really helpful to kind of reach out to industry
20 proactively about, hey, there's a new thing. It's interesting
21 because they had heard about it, but it's primarily being used
22 as an alternative in the U.K. and in Europe due to some of
23 their chemistries being taken off the market. So it's sort of
24 a novel product, and I think there's just generally interest in
25 being able to try it. But it's not something that's being

1 currently used widely in organic or conventional, certainly
2 here in Washington.

3 That sort of reminded me, I'll just note that our big
4 trading partners, Canada and EU, do currently allow ethylene
5 for this particular use. So it would be somewhat of an
6 alignment with our trading partners.

7 But it was rewarding to sort of say, hey, here's this
8 new tool before us. Let's, you know, reach out and kind of
9 start the process of getting folks engaged. So it was
10 encouraging to see a number of growers who I had, you know,
11 shown that this was something that was coming up to submit
12 comments in support of its evaluation.

13 BOARD MEMBER POWELL-PALM: I was just going to say, I
14 see this as sort of like the direct opposite of just saying, we
15 hope we hear from folks about this material. So thank you for
16 that proactive move to actually engage these folks that this
17 affects.

18 BOARD MEMBER JOHNSON: Thanks. Kyla?

19 CHAIR SMITH: Amy can go before me. I'm still
20 collecting my comments.

21 BOARD MEMBER JOHNSON: Amy, please.

22 VICE CHAIR BRUCH: Nate, thanks for taking this on.
23 It's an interesting subject. I don't have my grower hat on. I
24 have my consumer hat on. And being in a rural community,
25 buying organic potatoes is very difficult. I enjoy buying

1 them, but they last maybe a day. I do online grocery, and most
2 of the time when I pick up my potatoes, they are going in the
3 trash can because they are not at a good quality. They're, you
4 know, and that's the realities of our transportation and
5 logistics system.

6 So I really, you know, tools for farmers are
7 important to get their products to a consumer so we can enjoy
8 and keep the pipeline going. So I really support this with my
9 consumer hat on. Thank you.

10 BOARD MEMBER JOHNSON: Kyla, then Amy.

11 CHAIR SMITH: Okay. Yes, so I am intrigued to
12 continue to unpack the tropical fruit part of this annotation.
13 In the Organic Integrity Database, there is a category for
14 tropical fruits, and PCO uses Intact, and I know a lot of other
15 certifiers do. And within the Intact system, there is a way by
16 which you, like, you know, select the category and then the
17 crop that goes or the product that goes with that category.
18 And the connection between tropical fruit, the list is quite
19 long, actually. So it's just intriguing to me that, like, if a
20 producer was using this for any of those items that is, like,
21 listed, identified as, like, a tropical fruit on their
22 certificate, like, we -- I think we'd have to allow it. And so
23 I'm just, like, interested to unpack that a little bit more and
24 perhaps get a little more granular or not. Like, maybe that's
25 okay, and we're okay with that. But I just, yeah, was thinking

1 about that a little bit during this review.

2 BOARD MEMBER JOHNSON: Thanks, Kyla.

3 Mindee?

4 BOARD MEMBER JEFFERY: I really appreciate Amy's
5 perspective as a consumer. And because I'm going off the
6 board, I'm Amy-tasking you with also remembering this side of
7 the conversation, and I'm going to give myself latitude again.

8 I'm sitting on the plane, and oftentimes, you know,
9 what do you do? Where are you going? Are you going home? Are
10 you going to work? And, you know, I generally tell people I'm
11 going to work on organic, and if they get interested, I give
12 them a really inspiring talk about what it means to do
13 democracy in America. And one plane seat at a time.

14 And so I'm talking to this guy on the way here, and
15 he's like, I thought organic was, like, ten percent real. And
16 I told him what it is and what we do. And I saw him in the
17 baggage claim, and he yelled across the airport, "I just called
18 my family and told them organic is real."

19 As a basketball player, I love that moment. Yelled
20 at me across the airport. And as a person who loves to take my
21 sprouted potatoes and plop them in my compost and watch the
22 magic happen, I want you to help me make sure that if you
23 approve this substance, I can still plant my organic potato.
24 Thank you.

25 SECRETARY LEWIS: Yeah.

1 BOARD MEMBER JEFFERY: Because organic is real.

2 SECRETARY LEWIS: And so are residues, so thank you.
3 Yeah.

4 CHAIR SMITH: Kim?

5 BOARD MEMBER HUSEMAN: And if that doesn't work, Amy
6 can add some organic hogs to her operation and have her feed
7 stock.

8 BOARD MEMBER JOHNSON: Great comments, everyone. Any
9 more discussion on this one? All right.

10 So I think we'll see next steps on that hopefully in
11 the spring. And now we're ready to tackle this very long
12 Handling Sunset list, starting with -- thank you for being the
13 quicker operator, Nate -- starting with Nate on acids, citric
14 and lactic.

15 SECRETARY LEWIS: All right. I know I've been doing
16 a lot of talking this morning, so bear with me. Thank you.

17 HANDLING SUNSET REVIEW: Citric and Lactic Acids

18 SECRETARY LEWIS: Okay. So this is the sunset review
19 for citric and lactic acids listed at 205.605(a)(1), acids
20 (Citric -- produced by microbial fermentation of carbohydrate
21 substances; and Lactic). We spent a little bit of time
22 talking about whether or not we should be adding an organic
23 commercial availability as an annotation to citric acid since
24 it is available. I think there were some valid points on both
25 sides, and I think it's something that I would encourage the

1 Board to continue to look at, not something that rose to the
2 top of our priority list for this semester and this sunset
3 review.

4 Another element I'd like to point out, which is a
5 little bit of a reiteration from earlier conversation around
6 induced metagenesis is just that this is, in the world of
7 fermentation, clarity that we need, and that it appears
8 according to the new TR we got on citric acid, that much of the
9 citric acid produced by aspergillus niger is produced through
10 organisms that have been affected by induced metagenesis. So
11 as we think about excluded methods, we need to think not just
12 about seeds and varieties but also the organisms used in our
13 fermentation processes.

14 This product -- these products remain essential in
15 organic processing. Comments generally supported their
16 relisting, and I think we can move forward with the votes,
17 which was that the subcommittee found both substances to be
18 compliant with the Organic Foods Production Act, and so this is
19 a little bit of a tricky one.

20 I think we have to take two votes. So it's one
21 listing, but there's two substances at one listing. So I think
22 we're going to need to take two votes on each of the
23 substances, one for citric and one for lactic.

24 CHAIR SMITH: Thanks, Nate. Questions, comments?

25 BOARD MEMBER JOHNSON: I'll just flag at this point

1 that the idea of commercial availability in 605 has been coming
2 up a lot. It's not written there in the way that it is on 606
3 for agricultural ingredients, but we are starting to see,
4 especially in this nonsynthetics area, organic versions coming
5 online. So I'm interested in seeing us tackle what we can
6 start to build in formally to give preference for organic
7 versions of nonorganic materials that are on the list for
8 handling. And that probably needs to be dealt with at a full
9 list level rather than case by case. But I did want to
10 acknowledge that that was one of the issues that came up in
11 comments on this.

12 CHAIR SMITH: Amy?

13 VICE CHAIR BRUCH: Just one comment with the
14 commercial availability. I think it's always good for our
15 board and the community to just understand it at a macro level
16 and understand production and distribution, not only on our --
17 within our borders but internationally, too. So that's just
18 one flag there. Thank you.

19 SECRETARY LEWIS: And can I just jump in? I phoned a
20 friend here, and apparently we can just take it in one vote if
21 folks are comfortable with that. We did do it in two votes in
22 the subcommittee, but apparently because it's one National List
23 entry that includes two substances, we can do it in one vote.
24 So we would do it as a group of the two substances in one vote.

25 BOARD MEMBER JOHNSON: Any concerns with that

1 approach? Awesome.

2 All right. Kyla, over to you.

3 CHAIR SMITH: Okay. We have the motion to remove
4 acids (citric and lactic). They're listed at 205.605(a)(1).
5 The -- both of the motions were made in subcommittee by Nate
6 and then seconded by myself, and the vote starts with Allison.

7 BOARD MEMBER JOHNSON: No.

8 SECRETARY LEWIS: No.

9 BOARD MEMBER HUSEMAN: No.

10 VICE CHAIR BRUCH: No.

11 BOARD MEMBER QUARCOO: No.

12 BOARD MEMBER JEFFERY: No.

13 BOARD MEMBER POWELL-PALM: No.

14 BOARD MEMBER TURNER: No.

15 CHAIR SMITH: Logan?

16 BOARD MEMBER PETREY: No.

17 BOARD MEMBER D'AMORE: No.

18 BOARD MEMBER DIMITRI: No.

19 BOARD MEMBER NANDWANI: No.

20 BOARD MEMBER CALDWELL: No.

21 CHAIR SMITH: Chair votes no.

22 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
23 zero recusals, one absent. The motion fails.

24 (Motion fails)

25 BOARD MEMBER JOHNSON: Perfect. Thank you. There is

1 that moment of panic when you're the first one to remember
2 which direction we're voting. Oh, no. It's like clapping at a
3 football game. Is it my team?

4 Okay. Over to Carolyn for calcium citrate, potassium
5 citrate, and sodium citrate.

6 2026 HANDLING SUNSET REVIEWS: Calcium citrate, potassium
7 citrate, sodium citrate

8 BOARD MEMBER DIMITRI: Great. Thank you, Allison. I
9 will talk about all three of them together, and then we vote on
10 them separately, and these derive from citric acid. I'll be
11 using the summary method. All three products were unanimously
12 voted to be relisted at the last meeting.

13 Potassium -- oh, so all of these products are used as
14 pH controls, flavoring agents, buffering, or emulsifiers. And
15 in addition, calcium citrate is used for dietary supplements.
16 In general, the support for relisting is overwhelmingly
17 positive with two comments about adding an annotation regarding
18 prohibition of excluded methods as a source and another
19 commenter suggested annotation for use. Thank you.

20 CHAIR SMITH: Thanks, Carolyn. Any questions,
21 discussion?

22 (No audible response)

23 2026 HANDLING SUNSET REVIEWS: Calcium Citrate

24 CHAIR SMITH: Okay. We can move to the vote. As
25 Carolyn said, we'll take three votes, and the first one is

1 calcium citrate. There's a motion to remove calcium citrate
2 from the National List at 205.605(b)(7). The motion was made
3 in subcommittee by Carolyn and seconded by Nate Lewis, and the
4 vote starts with Amy.

5 VICE CHAIR BRUCH: No.

6 CHAIR SMITH: Amy's being secretary right now.

7 BOARD MEMBER QUARCOO: No.

8 BOARD MEMBER JEFFERY: No.

9 BOARD MEMBER POWELL-PALM: No.

10 BOARD MEMBER HUSEMAN: No.

11 BOARD MEMBER TURNER: No.

12 CHAIR SMITH: Logan. Logan, I didn't hear you.

13 BOARD MEMBER PETREY: No.

14 BOARD MEMBER D'AMORE: No.

15 BOARD MEMBER DIMITRI: No.

16 BOARD MEMBER NANDWANI: No.

17 BOARD MEMBER JOHNSON: No.

18 CHAIR SMITH: Chair votes no.

19 VICE CHAIR BRUCH: All right. Thanks for bearing
20 with me. New computer and a little bit of technical difficulty
21 on this Excel spreadsheet. So what I have is 14 no, zero yes,
22 no abstentions, no recusals, and one absent. Oh, two. Oh,
23 gosh, that'd be two absent. Sorry.

24 Let me correct that. I'm doing manual math here.

25 Sorry. 13 no, zero yes, no abstentions, no corrections, or no

1 recusals, zero or two absent. Sorry. The motion fails. Thank
2 you. Sorry.

3 (Motion fails)

4 2026 HANDLING SUNSET REVIEWS: Potassium Citrate

5 CHAIR SMITH: Welcome back, Nate. We're so glad to
6 have you back. Amy's good for secretary. Okay. Can you do
7 it? Thank you.

8 The next motion is to remove potassium citrate from
9 the National List that's listed at 205.605(b)(25) And the
10 motion comes from subcommittee, made by Carolyn, seconded by
11 Kim. And we'll start the vote with Nate.

12 SECRETARY LEWIS: No.

13 VICE CHAIR BRUCH: No.

14 BOARD MEMBER QUARCOO: No.

15 BOARD MEMBER JEFFERY: No.

16 BOARD MEMBER POWELL-PALM: No.

17 BOARD MEMBER HUSEMAN: No.

18 BOARD MEMBER TURNER: No.

19 CHAIR SMITH: Logan?

20 BOARD MEMBER PETREY: No.

21 BOARD MEMBER D'AMORE: No.

22 BOARD MEMBER DIMITRI: No.

23 BOARD MEMBER NANDWANI: No.

24 BOARD MEMBER CALDWELL: No.

25 BOARD MEMBER JOHNSON: No.

1 CHAIR SMITH: Chair votes no.

2 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
3 zero recusals, one absent. The motion fails.

4 (Motion fails)

5 2026 HANDLING SUNSET REVIEWS: Sodium Citrate

6 CHAIR SMITH: The last one is citrate, a motion to
7 remove sodium citrate from the National List that's listed at
8 205.605(b)(31). It comes motioned out of subcommittee by
9 Carolyn, seconded by Jerry, and the vote will start with
10 Franklin.

11 BOARD MEMBER QUARCOO: No.

12 BOARD MEMBER JEFFERY: No.

13 BOARD MEMBER POWELL-PALM: No.

14 BOARD MEMBER HUSEMAN: No.

15 BOARD MEMBER TURNER: No.

16 CHAIR SMITH: Logan?

17 BOARD MEMBER PETREY: No.

18 BOARD MEMBER D'AMORE: No.

19 BOARD MEMBER DIMITRI: No.

20 BOARD MEMBER NANDWANI: No.

21 BOARD MEMBER CALDWELL: No.

22 BOARD MEMBER JOHNSON: No.

23 SECRETARY LEWIS: No.

24 VICE CHAIR BRUCH: No.

25 CHAIR SMITH: Chair votes no.

1 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
2 zero recusals, one absent. The motion fails.

3 (Motion fails)

4 BOARD MEMBER JOHNSON: All right. Thank you all.

5 Okay. Next up, we have a bundle that Jerry will
6 handle: enzymes, microorganisms, and yeast, and I'll just
7 acknowledge from the top that this is another one where we took
8 a deep dive, and Jerry really spent a lot of time digging into
9 this issue, so appreciate your leadership and look forward to
10 the discussion.

11 2026 HANDLING SUNSET REVIEWS: Enzymes, Microorganisms, Yeast

12 BOARD MEMBER D'AMORE: Well, thank you. A deep dive
13 or not, I'm going to take my lessons from Carolyn on what
14 brevity means. That was wonderful.

15 So yes, what I'm going to do is get this done in less
16 than 10 minutes for all three of them. It had extensive review
17 and discussion, and I thought very good discussion in
18 Milwaukee. I will focus -- well, let me get back to the text
19 here.

20 I will be addressing three sunset materials: enzymes,
21 microorganisms, and yeast. All three of these sunsets were
22 reviewed and discussed extensively in Milwaukee. Today, I will
23 focus briefly on two things: what was discussed in Milwaukee
24 and at post-Milwaukee subcommittee meetings that now appear in
25 the documents in this Portland binder, a review of stakeholder

1 comments, both oral and written, that are also part of the
2 Milwaukee timeframe, post-Milwaukee timeframe.

3 As reviewed and discussed in Milwaukee, all three of
4 these sunsets are supported by a total of 14 independent taps,
5 or TRs, and a 2023 limited scope TR, which was tasked with
6 researching fermentation processes used to derive these three
7 substances, and to indicate which products are derived using
8 organisms devoted -- developed by excluded methods. The 2023
9 limited scope TR makes three points, among many others. One,
10 at about line 974, quote, "Enzymes produced by excluded methods
11 are, in most cases, indistinguishable from those from naturally
12 occurring unmodified organisms. There are no currently
13 available methods to determine directly and conclusively
14 whether an enzyme is produced by excluded methods or
15 naturally."

16 At about line 1004, quote, "The pace of technological
17 development is such that a list of excluded methods will always
18 need to be updated."

19 At about line 112, quote, "This is another area where
20 regulation must rely on trust and self-reporting," and there's
21 a new word that I like now, which is risk-based assessment.
22 Due to some of the significant degrees -- due to some
23 significant degree on the findings in the 2023 limited scope TR
24 and the board discussion in Milwaukee, all three sunsets,
25 microorganisms, yeast, and enzymes, have a new paragraph in

1 this Portland package, which reads as follows.

2 The presentation of yeast, or it will be enzymes or
3 it will be microorganisms, so the presentation of yeast sunset
4 document, among other sunsets, at the spring 2024 board meeting
5 in Milwaukee generated considerable board discussion, mostly
6 regarding fermentation and excluded methods. This discussion
7 provided details regarding the certifier process, which
8 includes the use of a risk-based approach assessing the
9 compliance of 205.605(a), inputs. This approach is described
10 in the ACA's best practice for common material review issues,
11 which provides further information regarding the
12 classification, verification, prohibitions, and prohibitions of
13 excluded methods.

14 2026 HANDLING SUNSET REVIEWS: Enzymes

15 So now, for brevity, enzymes at 205.605(a),
16 nonsynthetic allowed, must be derived from edible, nontoxic
17 plants, nonpathogenic fungi, or nonpathogenic bacteria.
18 Enzymes are naturally occurring proteins that act as highly
19 efficient catalysts in biochemical reactions. Enzymes are
20 produced by all living organisms.

21 The 2011 TR did not find the manufacture or use of
22 enzymes to be harmful to the environment or biodiversity, nor
23 did the TR find significant effects on human health. The 2023
24 limited scope TR does not add any information about human
25 health or environmental issues beyond those which would be of

1 concern should excluded methods be used.

2 Much like the 2024 spring session in Milwaukee,
3 stakeholder comments for this Portland session totaled about
4 19, with the majority being written and one being against the
5 relisting. The subcommittee finds enzymes compliant with OFPA
6 and/or 7 CFR 205.600 and is not proposing removal. At
7 subcommittee, we had a vote of 0-7, 1 abstention, and 2 absent.
8 So I think at this point we can do enzymes.

9 BOARD MEMBER JOHNSON: Thank you, Jerry.

10 Questions or comments?

11 (No audible response)

12 CHAIR SMITH: I just needed to see the motion. Thank
13 you.

14 Okay. The motion to remove enzymes from the National
15 List at 205.605(a)(11) was made by Jerry in subcommittee and
16 seconded by myself. And the vote starts with Mindee.

17 BOARD MEMBER JEFFERY: No.

18 BOARD MEMBER POWELL-PALM: No.

19 BOARD MEMBER HUSEMAN: No.

20 BOARD MEMBER TURNER: No.

21 CHAIR SMITH: Logan?

22 BOARD MEMBER PETREY: No.

23 BOARD MEMBER D'AMORE: No.

24 BOARD MEMBER DIMITRI: No.

25 BOARD MEMBER NANDWANI: No.

1 BOARD MEMBER CALDWELL: No.

2 BOARD MEMBER JOHNSON: No.

3 SECRETARY LEWIS: No.

4 VICE CHAIR BRUCH: No.

5 CHAIR SMITH: Chair votes no.

6 SECRETARY LEWIS: Zero yes, 13 no, 0 abstention, 0
7 recusal, 2 absent. The motion fails.

8 (Motion fails)

9 2026 HANDLING SUNSET REVIEWS: Microorganisms

10 BOARD MEMBER D'AMORE: Okay. Thank you. Next,
11 microorganisms at 205.605(a), nonsynthetic allowed. This was
12 added to the National List in 2006. Can be any food-grade
13 bacteria, fungi, or other microorganisms. Microorganisms are
14 used by organic producers to make many well-known products.

15 There are a variety of ways microorganisms can be
16 produced. General, a medium -- generally, a medium is
17 inoculated with a sample of fermented food to produce a starter
18 culture. Depending on the organism desired, different mediums
19 ranging from milk products to rice may be used to create a
20 starter culture. The 2023 limited scope TR did not bring up
21 additional concerns of human health or the environment beyond
22 those that would occur through the use of excluded methods.

23 Going into the spring meeting in Milwaukee, there
24 were about 19 total stakeholder comments. For this season,
25 there were not as many, but there were, excuse me, comments,

1 however, there were two new ones, both of them in favor of
2 relisting. The subcommittee finds microorganisms compliant
3 with OFPA and/or 7 CFR 205.600 and is not proposing removal.

4 At subcommittee, the votes were none at yes, seven at
5 no, zero recuse, with two absent.

6 BOARD MEMBER JOHNSON: Thanks, Jerry. Discussion or
7 questions? Brian.

8 BOARD MEMBER CALDWELL: Thanks, Jerry. In the
9 interest of sort of moving ahead on this -- all this excluded
10 methods thinking and discussion, what were the kinds of
11 responses from stakeholders about ensuring that excluded
12 methods would not be used in the production of microorganisms?

13 BOARD MEMBER D'AMORE: Well, that's a great question,
14 and the answer is kind of broad in that on the first go-around,
15 there was a lot of very specific concern expressed. I think
16 the meeting in Milwaukee, not just for these three substances,
17 but for a wide range of substances, provoked a -- an elevation
18 of the notion of excluded methods and fermentation. And what I
19 found on this go-around, Brian, was that the responses were not
20 so pointed towards these three, but created for me a whole new
21 bucket of that concern through many different things that we
22 look at, a lot of which Nate looked at just a little earlier.

23 I'm not sure that specifically answered your
24 question, and if you want to take another run at me, you're
25 welcome to.

1 BOARD MEMBER CALDWELL: Well, just wondering, are
2 people using like affidavits or what kinds of, you know,
3 insurance are they trying -- getting?

4 BOARD MEMBER D'AMORE: You know, the term "affidavit"
5 was the thing that put me in a tailspin on the first go-around,
6 because affidavit doesn't mean a whole lot to me. But so
7 affidavit, but affidavit then tied into very specific
8 communication on -- from the ACA on what that means and how
9 it's handled.

10 Another fairly new term to me in this contest --
11 context was the risk-based assessment of -- and so that would
12 be my answer to that.

13 BOARD MEMBER CALDWELL: Okay. Thanks a lot.

14 BOARD MEMBER D'AMORE: Well, and I guess I can be a
15 little bolder. I think the whole community has a recognition
16 these are in place, they're very important, and my sense of it
17 is, over from the Milwaukee meeting, a general sense of
18 consensus that it's really nice that we're talking about it.

19 BOARD MEMBER JOHNSON: Thank you both. Kyla?

20 CHAIR SMITH: Yeah, I just was going to sort of echo
21 what Jerry said, is that certifiers do rely on affidavits for
22 -- from manufacturers stating that they don't use excluded
23 methods in the production. There -- and then what Jerry was
24 talking about with the risk-based approach, that in the ACA
25 best practice document that comes out of the materials working

1 group, it's like a continuously updated best practice document
2 that certifiers use, and there's a table in the back that runs
3 through the 605 materials and has a bit of a risk
4 classification for when to dive a little deeper in the
5 materials. And there are some that they're, admittedly,
6 they're like, we don't know or, like, we don't have consensus
7 from the group for whether or not the material is high or low
8 risk. But there is a process by which it's outlined in that
9 best practice document for evaluating those materials and
10 getting affidavits and digging a little bit deeper in some
11 instances.

12 BOARD MEMBER D'AMORE: You gave that same explanation
13 in Milwaukee and settled this boy down. Okay. Thanks.

14 The last one we're looking at here is --

15 CHAIR SMITH: Oh, wait, Jerry, we've got to vote.

16 BOARD MEMBER JOHNSON: We've got to vote on that.

17 Any other?

18 BOARD MEMBER D'AMORE: That's called a presumptive
19 close.

20 BOARD MEMBER JOHNSON: Any other discussion or
21 comments on microorganisms?

22 CHAIR SMITH: Okay. The motion to remove
23 microorganisms from the National List at 205.605(a)(19) was
24 motioned in subcommittee, made by Jerry, seconded by Carolyn,
25 and the vote starts with Nate.

1 BOARD MEMBER POWELL-PALM: No.

2 BOARD MEMBER HUSEMAN: No.

3 BOARD MEMBER TURNER: No.

4 CHAIR SMITH: Logan?

5 BOARD MEMBER PETREY: No.

6 BOARD MEMBER D'AMORE: No.

7 BOARD MEMBER DIMITRI: No.

8 BOARD MEMBER NANDWANI: No.

9 BOARD MEMBER CALDWELL: No.

10 BOARD MEMBER JOHNSON: No.

11 SECRETARY LEWIS: No.

12 VICE CHAIR BRUCH: No.

13 BOARD MEMBER QUARCOO: No.

14 BOARD MEMBER JEFFERY: No.

15 CHAIR SMITH: Chair votes no.

16 SECRETARY LEWIS: Zero yes. Fourteen no. Zero

17 abstentions. Zero recusals. One absent. The motion fails.

18 BOARD MEMBER D'AMORE: How did you get 14 no out of

19 that? Is that right? I'm sorry. I thought I heard 14. And

20 then we've got -- and there was another one in there?

21 BOARD MEMBER JOHNSON: Oh, that makes it one absent.

22 BOARD MEMBER D'AMORE: Beg your pardon. The

23 proverbial long-term absence. I'm sorry. I missed that.

24 Sorry.

25 BOARD MEMBER JOHNSON: Go on to yeast, Jerry.

1 BOARD MEMBER D'AMORE: Sorry. And if any of you
2 think that was staged, you're mistaken.

3
4 2026 HANDLING SUNSET REVIEWS: Yeast

5 BOARD MEMBER D'AMORE: Okay. Let's go on with yeast,
6 202.605(a), nonsynthetic allowed. This substance is heavily
7 annotated in terms of its use and in terms of the substrate
8 restrictions.

9 Yeast has been widely used for centuries. It is a
10 microorganism that is commonly used for fermentation, baking
11 food flavors and adding nutritional value and providing health
12 benefits. Many yeasts are ubiquitous in the environment, and
13 in some cases, handlers use these wild yeasts to make breads or
14 other fermentation -- from fermentation, excuse me. The 2023
15 limited scope TR made it clear that yeast may be genetically
16 modified, primarily within brewing and fermentation
17 applications. Yeast manufacturers are increasingly using tools
18 like CRISPR to edit genes and to add desirable traits from wild
19 strains. The 2023 limited scope TR lines 499 through 504 would
20 reference that.

21 These genetically modified yeasts would be prohibited
22 under current NOP regulations. According to the 2014 TR, there
23 are a few yeast species that are formulated with no ancillary
24 substances. However, many commercially available yeasts are
25 formulated with other ingredients. These substances, such as

1 ascorbic acid, may be on the National List.

2 Yeast itself is often considered to be of minimal
3 risk, both to the environment and in human use. The
4 manufacturing process, however, can be harmful to the
5 environment if not properly administered to.

6 There were about 13 total comments informing the 2002
7 (sic) meeting in Milwaukee. All were in favor of relisting.
8 There were no new comments coming into this fall session. The
9 subcommittee finds yeast compliant with OFPA and/or 7 CFR
10 205.600 and is not proposing removal. Subcommittee vote was
11 zero yes, seven no's, no abstentions, no absence -- oh and two
12 absence, excuse me. That's it.

13 BOARD MEMBER JOHNSON: Thanks, Jerry. Questions,
14 discussion?

15 (No audible response)

16 BOARD MEMBER JOHNSON: All right. Let's vote on
17 yeast.

18 CHAIR SMITH: Okay. The motion is to remove yeast
19 from the National List at 205.605(a)(30). The motion was made
20 in subcommittee by Jerry and seconded by Dilip. And the vote
21 starts with Kim.

22 BOARD MEMBER HUSEMAN: No.

23 BOARD MEMBER TURNER: No.

24 CHAIR SMITH: Logan?

25 BOARD MEMBER PETREY: No.

1 BOARD MEMBER D'AMORE: No.

2 BOARD MEMBER DIMITRI: No.

3 BOARD MEMBER NANDWANI: No.

4 BOARD MEMBER CALDWELL: No.

5 BOARD MEMBER JOHNSON: No.

6 SECRETARY LEWIS: No.

7 VICE CHAIR BRUCH: No.

8 BOARD MEMBER QUARCOO: No.

9 BOARD MEMBER JEFFERY: No.

10 BOARD MEMBER POWELL-PALM: No.

11 CHAIR SMITH: Chair votes no.

12 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
13 zero recusals, one absent. The motion fails.

14 (Motion fails)

15 BOARD MEMBER JOHNSON: All right. Thanks for that
16 big bounce, Jerry. I appreciate it.

17 BOARD MEMBER D'AMORE: No, I thank you. These three
18 made me feel like I was truly a part of a team, so I thank all
19 of you as well.

20 BOARD MEMBER JOHNSON: All right. Moving right along
21 to calcium chloride with Kyla.

22 2026 HANDLING SUNSET REVIEWS: Calcium chloride

23 CHAIR SMITH: Okay. I'll be using the summarized
24 sunset review process. This material is listed at
25 205.605(a)(7) as a nonsynthetic. Calcium chloride is used in a

1 wide variety of food processing applications, including as a
2 firming agent, a flavor enhancer, a nutrient supplement, pH
3 control, processing aid, stabilizer and thickener, and a
4 synergist in, you know, dressings and food snacks as a
5 tenderizer. So lots of different uses sort of all over the
6 place.

7 This was unanimously relisted at the last sunset
8 review and also unanimously voted out of subcommittee. Most
9 commenters were in favor of relisting. Two didn't state a
10 position, and there were also a couple of comments related to
11 the levels of impurities and a request that the Board should
12 further investigate this and consider an annotation in the
13 future. That's it.

14 BOARD MEMBER JOHNSON: Thanks, Kyla. Discussion,
15 questions?

16 (No audible response)

17 BOARD MEMBER JOHNSON: All right. Ready for the vote
18 on calcium chloride.

19 CHAIR SMITH: The motion to remove calcium chloride
20 from the National List at 205.605(a)(7) was motioned in
21 subcommittee by myself and seconded by Allison. The vote
22 starts with Wood.

23 BOARD MEMBER TURNER: No.

24 CHAIR SMITH: Logan?

25 BOARD MEMBER PETREY: No.

1 BOARD MEMBER D'AMORE: No.

2 BOARD MEMBER DIMITRI: No.

3 BOARD MEMBER NANDWANI: No.

4 BOARD MEMBER CALDWELL: No.

5 BOARD MEMBER JOHNSON: No.

6 SECRETARY LEWIS: No.

7 VICE CHAIR BRUCH: No.

8 BOARD MEMBER QUARCOO: No.

9 BOARD MEMBER JEFFERY: No.

10 BOARD MEMBER POWELL-PALM: No.

11 BOARD MEMBER HUSEMAN: No.

12 CHAIR SMITH: Chair votes no.

13 SECRETARY LEWIS: Zero yes. Fourteen, no. Zero
14 abstentions. Zero recusals. One absent. The motion fails.

15 (Motion fails)

16 2026 HANDLING SUNSET REVIEWS: L-malic acid

17 BOARD MEMBER JOHNSON: All right. Thank you. Okay.

18 Back to L-malic acid. It's time for the sunset discussion. So
19 as a reminder, we decided to bring the reclassification back to
20 subcommittee, so this is just looking at the sunset of the
21 existing listing as a nonsynthetic.

22 Nate Lewis?

23 SECRETARY LEWIS: I got all the acids this time
24 around, so I don't know exactly what that means, but here we
25 go. This is, as Allison said, for the sunset review of its

1 current listing at 605(a). L-malic acid is a flavoring agent,
2 flavor enhancer, and pH control in a variety of foods. It was
3 passed unanimously out of the subcommittee to remain on the
4 list, and just want to acknowledge the ongoing work about
5 classification and its listing on 605(b). So I appreciate the
6 conversation earlier on that and look forward to working on
7 that for the next semester.

8 We don't need to dive into the different production
9 methods or anything like that, so I think with that, we'll
10 proceed with the vote on its sunset.

11 CHAIR SMITH: Thanks, Nate. Any discussion or
12 questions?

13 (No audible response)

14 BOARD MEMBER JOHNSON: All right. Let's go ahead
15 with the vote.

16 CHAIR SMITH: The motion to remove L-malic acid from
17 the National List at 205.605(a)(16) was motioned in
18 subcommittee by Nate and seconded - by Nate Lewis and seconded
19 by myself. The vote starts with Logan.

20 BOARD MEMBER PETREY: No.

21 BOARD MEMBER D'AMORE: No.

22 BOARD MEMBER NANDWANI: No.

23 BOARD MEMBER CALDWELL: No.

24 BOARD MEMBER JOHNSON: No.

25 SECRETARY LEWIS: No.

1 BOARD MEMBER QUARCOO: No.

2 BOARD MEMBER JEFFERY: No.

3 BOARD MEMBER QUARCOO: Sorry.

4 BOARD MEMBER POWELL-PALM: No.

5 BOARD MEMBER HUSEMAN: No.

6 BOARD MEMBER TURNER: No.

7 CHAIR SMITH: No.

8 SECRETARY LEWIS: Zero yes, 13 no, zero abstentions,
9 zero recusals, two absent. The motion fails.

10 (Motion fails)

11 2026 HANDLING SUNSET REVIEWS: Magnesium Sulfate

12 BOARD MEMBER JOHNSON: All right. Thank you. I'll
13 take the next one, which is magnesium sulfate at
14 205.605(a)(18). This is an allowed synthetic with an extra
15 annotation that reiterates only the nonsynthetic version is
16 allowed. And I'll be using the summarized sunset process here.

17 So this material is used as a nutrient in tofu. It's
18 a salt replacer. It's used in dietary supplements, drinks, and
19 as a fermentation and malting aid in beer, so many products
20 that we love. It was previously relisted unanimously with one
21 absence, and we've also voted on this material at this meeting
22 in livestock and crops.

23 We received several comments in support of relisting
24 the material, and I did also want to acknowledge one comment
25 that flagged an incorrect detail that was included in a past

1 document. So the spring discussion document for this material
2 incorrectly noted that there were no comments on the listing
3 during the last sunset review when actually an organization had
4 provided comments. So I had relied on the previous sunset
5 recommendation document to summarize past comments, so I really
6 apologize for that omission.

7 We value comments on these materials so much, and
8 particularly comments that raise concerns about potential harms
9 for materials and that keep us accountable to the full set of
10 OCWA criteria. So we'll make sure that we get those details
11 right in these final documents. And that commenter and one
12 other organization noted that we should really encourage users
13 of this material to consider the environmental concerns
14 associated with pit mining and seek out well-regulated sources
15 of magnesium sulfate.

16 So I think I've mentioned this before, but the
17 Handling Subcommittee is starting to take a deeper dive into
18 mined materials and the environmental issues that they raise,
19 with the help of our food technologist. So I hope that will
20 improve the depth of our analysis and assessment of materials
21 that do involve mining, which we know is an environmentally
22 destructive process.

23 So with that, any questions or discussion?

24 (No audible response)

25 BOARD MEMBER JOHNSON: Over to you.

1 CHAIR SMITH: The motion to remove magnesium sulfate
2 from the National List at 205.605(a)(18) was motioned in
3 subcommittee by Allison and seconded by Jerry, and the vote
4 starts with Jerry.

5 BOARD MEMBER D'AMORE: No.

6 BOARD MEMBER DIMITRI: No.

7 BOARD MEMBER NANDWANI: No.

8 BOARD MEMBER CALDWELL: No.

9 BOARD MEMBER JOHNSON: No.

10 SECRETARY LEWIS: No.

11 VICE CHAIR BRUCH: No.

12 BOARD MEMBER QUARCOO: No.

13 BOARD MEMBER JEFFERY: No.

14 BOARD MEMBER POWELL-PALM: No.

15 BOARD MEMBER HUSEMAN: No.

16 CHAIR SMITH: Logan?

17 BOARD MEMBER PETREY: No.

18 CHAIR SMITH: Chair votes no.

19 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
20 zero recusals, one absent. The motion fails.

21 (Motion fails)

22 2026 HANDLING SUNSET REVIEWS: Perlite

23 BOARD MEMBER JOHNSON: All right. On to Perlite and
24 Kim.

25 BOARD MEMBER HUSEMAN: Okay. I will be using the

1 summary version of Perlite for today. So Perlite is used as a
2 filtration aid, mostly for juices, wine, beer, and other
3 beverages that we enjoy.

4 We did request a TR for Perlite. It was not received
5 back in time for the spring in Milwaukee meeting. However, we
6 did get it back in time for this particular write-up. Prior to
7 the 2024 TR, there was a 1996 TAP. Information that came from
8 the TR was much the same what was already in the write-up.

9 We'll note that from a human health perspective,
10 silica dust and being -- is of concern and having proper PPE
11 when handling the material during the manufacturing process is
12 warranted. Other than that, from a public comment standpoint,
13 there were a handful of commenters, all positive for relisting.

14 BOARD MEMBER JOHNSON: Thanks, Kim. Discussion,
15 questions.

16 (No audible response)

17 BOARD MEMBER JOHNSON: Looks like we're ready to vote
18 on Perlite.

19 CHAIR SMITH: The motion to remove Perlite from the
20 National List at 205.605(a)(22) was motioned in subcommittee by
21 Kim and seconded by Nate Lewis. And the vote starts with
22 Carolyn.

23 BOARD MEMBER DIMITRI: No.

24 BOARD MEMBER CALDWELL: No.

25 BOARD MEMBER JOHNSON: No.

1 SECRETARY LEWIS: No.

2 BOARD MEMBER QUARCOO: No.

3 BOARD MEMBER JEFFERY: No.

4 BOARD MEMBER POWELL-PALM: No.

5 BOARD MEMBER HUSEMAN: No.

6 BOARD MEMBER TURNER: No.

7 CHAIR SMITH: Logan?

8 BOARD MEMBER PETREY: No.

9 BOARD MEMBER D'AMORE: No.

10 CHAIR SMITH: Chair votes no.

11 SECRETARY LEWIS: Zero yes, 13 -- no. Zero yes, 12
12 no. Zero abstention, zero recusals, three absent. The motion
13 fails.

14 (Motion fails)

15 BOARD MEMBER JOHNSON: Thank you. All right, next up
16 is potassium iodide with Logan.

17 2026 HANDLING SUNSET REVIEWS: Potassium Iodide

18 BOARD MEMBER PETREY: Thank you. Potassium iodide at
19 205.605(a), nonsynthetics allowed. This -- the use is used as
20 a form of iodine in trace minerals, mineral supplements.
21 Iodine is an essential component of thyroid hormones that
22 regulate basal metabolism, and deficiency can cause thyroid
23 enlargement, mental retardation, and hypothyroidism.

24 Previous reviews voted unanimously to keep this on
25 the list. The comments, the written comments in the spring

1 were mostly in support. We did have one commenter that noticed
2 or that stated that this is a synthetic or only used -- only
3 manufactured synthetically. And there were two comments that
4 reflected that this, because of the TR, that did state that
5 there are no sources of nonsynthetic and that it should be
6 pulled from this listing and then added to the synthetic
7 listing.

8 However, in -- also in the report -- in the TR, in
9 2011, the Board said that it was unnecessary to add it to the
10 synthetic list because it's listed in the nutrient, vitamin,
11 and minerals listing. And otherwise, there were six comments
12 -- written comments in favor of relisting this material. The
13 subcommittee vote was all in favor of relisting and zero yes,
14 seven no, and two absent.

15 BOARD MEMBER JOHNSON: Thanks, Logan. Questions or
16 discussion? Wood?

17 BOARD MEMBER TURNER: Allison, can you just remind me
18 that -- just give me a quick nerdy version of that NVM issue
19 and this material and why it --

20 BOARD MEMBER JOHNSON: Oh, you'll get a very nerdy
21 version of it in a little bit.

22 BOARD MEMBER TURNER: Okay. All right.

23 BOARD MEMBER JOHNSON: Yeah, I was going to preview
24 that. So we have nutrient vitamins, and minerals listed as
25 synthetics to allow for required supplementation. On the

1 synthetic side, there's also a separate listing for ferrous
2 sulfate or iron. So there's just an inconsistency or a
3 messiness to the list in how some of these materials that have
4 a supplement value or necessity are dealt with. We'll decide
5 how we want to deal with that on the vitamins listing, but I
6 think here it's actually nice to have the nonsynthetic listed
7 if it does indeed exist. It sounds like maybe it doesn't. But
8 I don't see harm in leaving it here and then continuing to
9 allow the synthetic version through the nutrient vitamins, and
10 minerals listing.

11 Any other questions, discussion?

12 (No audible response)

13 CHAIR SMITH: Okay. Motion to remove potassium
14 iodide from the National List, 205.605(a)(24). The motion was
15 made in subcommittee by Logan and seconded by Dilip. And the
16 vote starts with Dilip.

17 BOARD MEMBER NANDWANI: No.

18 BOARD MEMBER CALDWELL: No.

19 BOARD MEMBER JOHNSON: No.

20 SECRETARY LEWIS: No.

21 BOARD MEMBER QUARCOO: No.

22 BOARD MEMBER JEFFERY: No.

23 BOARD MEMBER POWELL-PALM: No.

24 BOARD MEMBER HUSEMAN: No.

25 BOARD MEMBER TURNER: No.

1 CHAIR SMITH: Logan?

2 BOARD MEMBER PETREY: No.

3 BOARD MEMBER D'AMORE: No.

4 BOARD MEMBER DIMITRI: No.

5 CHAIR SMITH: Chair votes no.

6 SECRETARY LEWIS: Zero yes, 13 no, zero abstentions,
7 zero recusals, two absent. The motion fails.

8 (Motion fails)

9 BOARD MEMBER JOHNSON: Thank you. Okay. So our dear
10 friend, Dilip, over here got all the materials that had
11 something unusual come up at the last minute, this being the
12 first of them. So, pullulan. Go ahead and start us off,
13 Dilip, and then I think we'll have some discussion on this one.

14 2026 HANDLING SUNSET REVIEWS: Pullulan

15 BOARD MEMBER NANDWANI: Thanks, Allison. I really
16 appreciate you mention already. Okay.

17 UNIDENTIFIED: Move closer to the mic.

18 BOARD MEMBER NANDWANI: Oh, sorry. Okay. It's good
19 now?

20 So, pullulan. It's 205.605(a), nonsynthetics
21 allowed. And it's used in tablets and capsules for dietary
22 supplements labeled "made with organic." We discussed in a
23 previous meeting already about its detailed use, manufacture,
24 and international acceptance. So I'll just go into the
25 discussion part.

1 Oh, okay. So the NOSB asked the stakeholders whether
2 organic agricultural pullulan is commercially available. And
3 one of the commenters, as we heard on other day, day one of
4 this meeting, a couple of stakeholders, they mentioned about
5 availability of organic pullulan and the company manufacturing
6 organic pullulan. So and but this is what we heard just a day
7 or like a couple of days ago.

8 And this document, you know, we discussed a few weeks
9 ago, just before this meeting. So at that time we mentioned
10 that it was not producing, you know, commercially that company,
11 that scale might be necessary to consider it commercially
12 available. So it is possible that by the next sunset review
13 that threshold could be met. So that was just before this.
14 And now we heard these two commenters in person also.

15 So let me add one more thing and then we'll open up.
16 So in the spring 2024 meeting, the stakeholders, they commented
17 about this. And now we have heard this manufacturer, he showed
18 on other day, that it can produce organic pullulan to supply
19 organic market demand. Another commenter noted that value in
20 retaining current listing for "made with organic" product. All
21 other commenters suggested relisting, but they commented before
22 hearing this information from the manufacturer and we don't
23 know what impact that would have on their position. So, could
24 be more manufacturers, more competitors.

25 Subcommittee finds pullulan compliant with OFPA.

1 This is what we discussed in our subcommittee meeting. It's
2 not proposing removal and it was vote seven no, zero abstain,
3 zero recuse, and two absent. And that's all. Allison?

4 BOARD MEMBER JOHNSON: Thank you, Dilip. I'll take
5 the prerogative of having the mic and kick off the discussion.

6 This is an interesting position because when the
7 subcommittee looked at this material, we had heard in the
8 spring that we weren't quite there on commercial availability.
9 But I think what we heard in public comments provided a pretty
10 compelling case that we are. The manufacturer said that they
11 can produce sufficient supply to meet demand. So it seems to
12 me that we may be at the point where this listing has served
13 its purpose to bridge a need in the supplement industry to a
14 point where more ingredients needed for supplement manufacturer
15 are actually available as organic.

16 We did hear concern in oral comments about the "made
17 with" category and that maybe we want to leave open the
18 possibility of producing supplements with a nonorganic capsule
19 and organic contents inside. But I personally was moved by the
20 manufacturer's comment that -- and by my own purchasing habits
21 that if you're seeking out the organic insides and you can get
22 the organic outside of a pill, you would probably prefer that
23 choice as a consumer. So I'm inclined to change my vote
24 recognizing that this is a pretty new change in the industry.

25 We did hear from a couple of companies that didn't

1 think we are there as far as supply. So the information that
2 was presented, I presume, would be new to them as well. But
3 we'll have a couple of years before the sunset rule becomes
4 final for manufacturing to catch up and complete this
5 transition to organic. So I'm not inclined to wait another
6 seven years to get there.

7 Other discussion or comments? I see Amy and then
8 Nate.

9 VICE CHAIR BRUCH: Hi. Dilip, thank you for taking
10 on difficult subject matter. I really appreciate it.

11 And I wanted to echo that for Jerry. I missed the
12 opportunity when you are presenting. You had very tough, tough
13 substances and I wasn't on your committee, but I know how you
14 wrestled with them and I appreciate what you did.

15 But anyway, going back to this substance in
16 particular, I'm all about continuous improvement. I think that
17 that's necessary.

18 I also am about verification. We need to verify and
19 reconcile not only when we're looking at risk and fraud, but
20 also I believe on this commercial availability. We did hear
21 that supply was there. They seemed confident. But do we
22 accurately know the size of the demand? Do we know that
23 variable? Does that company know that variable?

24 In a previous life of mine, I actually was a
25 packaging systems engineer for General Mills and I do know that

1 source material can be very challenging in terms of when
2 there's a hurricane, when there's a pandemic. When we only
3 have one supplier making this ingredient, that concerns me.
4 What's the price competition there?

5 We all talk about even playing field, playing by the
6 same rules. Producers love competition. I like competition
7 when I'm trying to buy source material as well. There is no
8 checks and balances on price setting.

9 I love the entrepreneurial spirit we saw with the
10 company that is manufacturing this product. But when there's
11 only one, they do have several manufacturing facilities, it's
12 still a little bit of a hard step for me to say let's just go
13 all in one direction. So I think we really need to evaluate
14 the size of the market space and compare that with the quantity
15 that the company can actually make.

16 I don't know if we have that information to go in
17 that direction at this moment. I love continuous improvement,
18 but we've got to get all of the facts. So thank you.

19 BOARD MEMBER JOHNSON: Thanks, Amy. Great points.
20 Nate Powell-Palm and then Kyla and then I see Mindee and Jerry.

21 BOARD MEMBER POWELL-PALM: I think in the last few
22 years we've been pretty consistent about saying monopoly is not
23 a good thing. And I totally, like, this is one of the coolest
24 times to hear directly from a manufacturer saying we've got the
25 product. We've got it. We're good at manufacturing it. And I

1 really loved how the commenter who is making this product said
2 they invite competition.

3 I need to see that competition tangibly in real time
4 to feel that we are doing our due diligence before we would
5 hand this off to a single manufacturer. So I would stick with
6 the vote of Kim -- not that I was on the vote, but I appreciate
7 the vote as it currently shows.

8 BOARD MEMBER JOHNSON: Yeah, really important point,
9 Nate. Thank you. Who -- Kyla and then Mindee and then Jerry
10 and then Carolyn.

11 CHAIR SMITH: I'm torn on this one. I was -- I like,
12 as you know, I'm, like, on this big mission to clean up the
13 National Lists and get things accurate, so I was compelled by
14 the classification kerfuffle and trying to get that sorted out
15 and the impact that has potentially like on the -- on a "made
16 with" product. I totally hear, you know, where you're coming
17 from, Allison. And, you know, maybe that could get sorted out
18 in rulemaking. I don't know. Like, if we did decide to remove
19 this, I don't know if that's a possibility. But -- and just,
20 you know, to reiterate that there is a whole other rulemaking
21 process here, so that where, you know, we could get some more
22 of that information.

23 All that being said, you know, the safest route to
24 have something removed is by a petition from industry when they
25 feel it is -- that there's comfort to -- and enough supply and

1 all the points that Amy and Nate are making. So I'm torn.

2 BOARD MEMBER JOHNSON: Mindee.

3 BOARD MEMBER JEFFERY: Thank you. I don't think I
4 know all the information I'm going to throw out there right
5 now. I apologize for throwing it out there at this late date.

6 But I'm not sure I totally understand the ins and
7 outs of the implications of organic labeling in the dietary
8 supplements industry, and I feel like it could be good for us
9 to understand that in this context. And I also feel like in
10 the supplements industry, I want both. I want USDA labels and
11 I want "made with" organic labels available to manufacturers
12 because I'm not sure what the 30 -- other 30 percent
13 implications are for them. So I feel like it might be a good
14 time to support both because that's what we're doing if we
15 choose to continue the listing, right? We're choosing to
16 support the possibility of a USDA-labeled supplement and
17 continue the support for the "made with organic" label. And so
18 I'm stuck in that. Is that accurate, Allison?

19 BOARD MEMBER JOHNSON: Just to put a fine point on
20 that, you could still make a "made with organic" supplement.
21 You wouldn't be able to use a nonorganic pullulan capsule. So
22 some, you know, if you're using a mix of ingredients, there'd
23 still be that room to have a 30 percent nonorganic composition.
24 But as far as using, say, your 70 percent was filled with the
25 contents of the capsule, and then the capsule is used.

1 BOARD MEMBER JEFFERY: So you're saying if we remove
2 this, there could still be 70 percent organic supplements?

3 BOARD MEMBER JOHNSON: Yeah, you could use a "made
4 with" claim on any product that has at least 70 percent organic
5 agricultural ingredients.

6 BOARD MEMBER JEFFERY: Right, right, right. I see
7 your point. I'm still not totally comfortable and conflicted
8 by it and don't want to hurt the marketplace and definitely
9 want more information. And I do think it's important for us to
10 understand, like, how our regulations translate into the
11 supplements industry when making decisions like this, because
12 I'm not clear as to those.

13 BOARD MEMBER JOHNSON: Thank you.

14 Jerry?

15 BOARD MEMBER D'AMORE: Yeah, well, it's hard to come
16 on top of all of that. I agree with everybody that is
17 cautioning us to slow it down. I think that the price of being
18 wrong is great. And in terms of the word suitable, there's
19 quality part of that, too, as well as a sufficient supply.

20 Can I help? Okay, and that's all I have. Thanks.

21 BOARD MEMBER JOHNSON: Yeah, thank you. I mean,
22 we're in sort of funny territory using commercial availability
23 language here, because we're not in the list that has a
24 commercial availability rule attached to it, but we are
25 thinking about the market implications of when something

1 becomes available organically.

2 Carolyn?

3 BOARD MEMBER DIMITRI: Jenny, I think it's -- I think
4 I need a lesson. Say we vote to not relist this. Can you just
5 walk us through the process that NOP does, because I'm
6 wondering if some of these questions are just things that you
7 would be looking at anyway and they're not really our job to
8 grapple with, whether there's a monopoly or anyway.

9 DR. TUCKER: Okay. So the question -- the
10 abstracting out here, the question is, in a sunset review if
11 the Board votes not to relist, so you vote yes to remove,
12 right? Okay. So it's a yes-vote to remove. If you do a yes
13 vote to remove, then we would take that back and do a proposed
14 rule, right?

15 BOARD MEMBER DIMITRI: Yeah, right. Just checking.

16 DR. TUCKER: We haven't done one of these in a while.
17 So we would do a proposed rule, and then based on public
18 comments to that proposed rule, we would determine whether to
19 do a final rule or not.

20 BOARD MEMBER DIMITRI: Thank you.

21 BOARD MEMBER JOHNSON: Nate Lewis and then Kyla.

22 SECRETARY LEWIS: I just wanted to reiterate that the
23 commercial availability piece does not apply to this substance
24 because of its location, and so it just sort of elevates.
25 Again, as Board considers annotations for the future, the

1 commercial availability is a tool in our toolbox to apply
2 potentially to 605 substances.

3 BOARD MEMBER JOHNSON: Kyla?

4 CHAIR SMITH: Yeah, I was going to respond to
5 Mindee's concerns a little bit more. So in the "made with"
6 category, or just sort of connect dots between Allison and
7 Mindee. So, yes, in the "made with" category, the caps -- if
8 we remove this -- the capsule could be made of some other type
9 of thing that capsules are made out of, or organic pullulan,
10 even in the "made with" category. I don't know why you would
11 do that, but whatever, you know. And I also wanted to point
12 out that pullulan is the only vegan capsule option allowed on
13 the National List.

14 BOARD MEMBER JOHNSON: Thank you. I'm going to put
15 myself in the queue, and I see you, Amy, to edit what I said
16 before and build on that, Kyla. That when something on 605(a),
17 so a nonsynthetic, nonorganic ingredient, becomes available as
18 organic, that signals to me that there is an agricultural
19 process that can get this product to market. So even if
20 someone were producing a pullulan capsule that didn't have
21 organic certification, the presence of organic pullulan on the
22 market now tells me you can make it agriculturally. So that
23 would leave open the possibility of the "made with" category
24 using all agricultural ingredients. And in that case, the
25 certifier would look at the capsule, determine if there were

1 excluded methods used, sort of if the big three were hit, and
2 if they could meet that criteria, you could still, I believe,
3 have a "made with" organic with a nonorganic pullulan capsule
4 that was produced through an agricultural process. If you want
5 to get, like, as wonky as can be here, I think it can be done,
6 is the point.

7 Amy?

8 VICE CHAIR BRUCH: All right. Allison, my legal
9 eagle, I might need your assistance with my statement, but I
10 believe in the manufacturing process, when the public
11 commenter, Tess, mentioned her system, I believe she said it
12 was patented, and it's been patented for 10 years. So I'm not
13 sure how long in that industry that patent, you know, the
14 process probably is available for whoever I'm imagining. You
15 know, that's what happens. I remember that with several
16 substances.

17 You get right out there, you put your patent in
18 there, and that's the roadmap to make this and other means and
19 competition to come into play versus the pathway of
20 intellectual property. A lot of manufacturers choose to not
21 disclose and patent so they can keep their trade secrets
22 internal.

23 So I really, I mean, Tess, public commenters, if
24 you're listening, it would be wonderful to understand if that
25 roadmap for future competition, future manufacturers, if that

1 roadmap is available, that would be very interesting to me to
2 understand. But am I articulating that correctly between IP
3 and patents?

4 BOARD MEMBER JOHNSON: You know, getting way beyond
5 my areas of expertise, but it's a good point and a question. I
6 heard the manufacturers say they welcome competition, which I
7 would hope believes that it is possible to compete with them,
8 but that may be a piece of information we don't have.

9 VICE CHAIR BRUCH: Yeah, maybe Carolyn, I know you're
10 big into the research. Maybe we can drum up that patent and
11 see, you know, the details there. But anyway, I just thought
12 that was interesting. I do remember that takeaway from that
13 public commenter, that they did say the process had been
14 patented for 10 years.

15 BOARD MEMBER DIMITRI: I know nothing about that,
16 sorry. But I do have another thought, and one is if you're
17 trying to, like, in a way, if this is removed, then the company
18 that is selling the organic version would have a better access
19 to market, because if you don't remove it, then they'll be
20 competing with people that are, like, selling a similar product
21 at a lower price. Just a thought. If that made any sense.

22 BOARD MEMBER JOHNSON: Yeah, thank you. I have Nate
23 Lewis, then Dilip, then Nate Powell-Palm, then Kim, then Kyla.

24 SECRETARY LEWIS: I'll try to be brief. I just want
25 to acknowledge that this conversation and this substance in

1 particular highlights the need to revisit classification as it
2 relates to fermentation products, particularly in the ag, non-
3 ag classification component of that, so that we can be clear
4 about what can be certified organic and when things are
5 certified organic what that implies to the products that are
6 currently on the National List and kind of that, just
7 connecting the dots there so that we're clear, moving forward.

8 BOARD MEMBER JOHNSON: Yeah, thank you.

9 Dilip?

10 BOARD MEMBER NANDWANI: A very simple question. The
11 manufacturer he mentioned on another day, that company is
12 already selling that organic pullulan in the market. Did they
13 get it? Okay. What could be the implications if we go remove
14 or keep it? I think you mentioned that they can sell at a
15 lower price. Did I -- or just trying to get a clear picture so
16 that when I move forward with, you know, voting, then, yeah.

17 BOARD MEMBER JOHNSON: Carolyn, do you want to
18 reiterate the price point you made?

19 BOARD MEMBER DIMITRI: I guess what I was saying is
20 if you have two products in the market and the consumer goes
21 and maybe will usually buy the lower priced one. If this is on
22 the list, if everything stays as it is, then the manufacturer
23 that has the supplement with the organic version will most
24 likely sell their product for a higher price than the one
25 without the organic version because they'll both be able to

1 have the organic label, but the ingredients will be less
2 costly. This is, like, very simplified.

3 So if you remove the, you know, if you get rid of
4 this listing and then it, say, truly is organic available, then
5 they won't be competing at -- with a product that looks the
6 same but actually doesn't have organic, however you say that
7 product in it.

8 BOARD MEMBER NANDWANI: Thank you.

9 BOARD MEMBER DIMITRI: Microphone. Microphone.
10 Microphone.

11 BOARD MEMBER JOHNSON: Frank, microphone.

12 BOARD MEMBER QUARCOO: So then they would then be
13 able to sell at a higher price?

14 BOARD MEMBER DIMITRI: I mean, I don't know. I don't
15 know what their pricing strategy would be, but I guess it's
16 just thinking about, like, two organic products compete with
17 each other, and that is not the same as an organic and a "made
18 with organic" ingredient level of competition.

19 BOARD MEMBER JOHNSON: Thank you. Yeah, and consumer
20 accessibility implications on the other side of that.

21 Nate and then Kim and then Amy, and then I want to
22 pause and make sure anyone who hasn't spoken yet has a chance
23 to if you want to. And then we probably need to move along.

24 BOARD MEMBER POWELL-PALM: Really appreciate this. I
25 think we are just, like, swimming in a dearth of information in

1 this right now, that this just sounds so right for them to
2 petition it off and give us all of this information. And I
3 think I feel really strongly that I hear Carolyn's points at a
4 very high level that we want to advantage the folks who are
5 investing in organic. But I think we have so many questions
6 about what the market looks like, how we actually can have
7 confidence in the supply chain, that I invite a petition for
8 this, and would be excited for the board to review that.

9 BOARD MEMBER JOHNSON: Kim.

10 BOARD MEMBER HUSEMAN: Okay. I appreciate the time
11 on this because I think it's going to -- this actually speaks
12 to so many products as we get through the day that let's
13 exhaust it here and then move on. So exists -- there's things
14 that we're talking about right now that are going to come up in
15 other National List substances that I'm getting ready to
16 discuss.

17 But what I want to bring forward is trade can be
18 outside of the organics purview. So I want to acknowledge that
19 when we talk about manufacturing and manufacturing processes
20 and we talk about U.S. and outside of the U.S., there could be
21 opportunity where if the supply chain is -- it can be fragile
22 and it may not be organic versus nonorganic, but that there
23 could be implications with geopolitical aspects too. So keep
24 that in mind.

25 BOARD MEMBER JOHNSON: Yeah, thank you, Kim.

1 Amy and then Logan.

2 VICE CHAIR BRUCH: Yes. I echo what Nate and Kim
3 said. I just need to know -- I know what supply is. I need to
4 know demand and then that can plug into what Carolyn said to
5 accurately move this forward. I think we're missing one
6 variable in that equation. Thank you.

7 BOARD MEMBER JOHNSON: Logan?

8 BOARD MEMBER PETREY: Yeah, just a quick question.
9 Nate, when you were talking about a petition, were you meaning
10 like a petition to remove --

11 BOARD MEMBER POWELL-PALM: Correct.

12 BOARD MEMBER PETREY: -- this material? Okay. Thank
13 you. That makes sense.

14 BOARD MEMBER JOHNSON: And I will acknowledge it's
15 pretty costly to petition us, to put together a substantial
16 petition. So another option is to wait another five years
17 until the next sunset. But yeah, there are pros and cons with
18 all of these different routes that we have to rule change.

19 Anyone else who hasn't had a chance to weigh in, want
20 to get your voice in the mix? Otherwise, we can vote now or we
21 could defer this vote to our final section. Do folks feel
22 ready to vote? Nate has a comment.

23 BOARD MEMBER POWELL-PALM: Just a quick question. If
24 you have any reason that you think we should defer, like if we
25 think we're looking to consider something else or we're

1 wondering a little bit?

2 BOARD MEMBER JOHNSON: I hear a lot of questions and
3 this was like out of the blue. It wasn't in any of the written
4 materials. So just want to make sure people have a chance to,
5 if you're not an on-the-fly decision maker and you're a
6 thinker, wait it out a little bit. But there's time for that
7 if necessary.

8 BOARD MEMBER POWELL-PALM: I feel good to vote.

9 BOARD MEMBER JOHNSON: Looks like folks are ready to
10 vote. So let's do it.

11 CHAIR SMITH: Andrea, can you make the slide a little
12 bit bigger on the screen for me, please? Thank you.

13 The motion to remove pullulan from the National List
14 from 205.605(a)(25), was made in subcommittee by Dilip and
15 seconded by Allison. The vote starts with Brian.

16 BOARD MEMBER CALDWELL: So my penalty for butting
17 into the discussion, I apologize, everyone, is I have to vote
18 first. But I vote no.

19 BOARD MEMBER JOHNSON: Yes.

20 SECRETARY LEWIS: No.

21 VICE CHAIR BRUCH: No.

22 BOARD MEMBER QUARCOO: No.

23 BOARD MEMBER JEFFERY: No.

24 BOARD MEMBER POWELL-PALM: No.

25 BOARD MEMBER HUSEMAN: No.

1 BOARD MEMBER TURNER: No.

2 CHAIR SMITH: Logan?

3 BOARD MEMBER PETREY: No.

4 BOARD MEMBER D'AMORE: No.

5 BOARD MEMBER DIMITRI: Yes.

6 BOARD MEMBER NANDWANI: No.

7 CHAIR SMITH: Chair votes no.

8 SECRETARY LEWIS: Two yes, 12 no, no abstentions, no
9 recusals, one absent. The motion fails.

10 (Motion fails)

11 BOARD MEMBER JOHNSON: That was a great discussion,
12 everyone. Thank you. And thanks, Dilip, for taking the lead
13 on this last-minute access to information that we had. I
14 think, yeah, we're sort of at a natural break point. That's
15 the last of the nonsynthetics.

16 So I'll hand it over to Kyla, and then we'll come
17 back with synthetics and 606 after lunch.

18 CHAIR SMITH: Yeah, let's have some lunch. We will
19 return at 1:30.

20 (LUNCH BREAK)

21 CHAIR SMITH: We are going to get back to the
22 Handling List, and I'm going to turn it over to Allison.

23 Allison, you ready?

24 BOARD MEMBER JOHNSON: All right. I hope everyone
25 had a delicious lunch that included some things that will keep

1 you awake and engaged for our next hour of handling. We're
2 going to move into the 605(b) synthetics list, starting with
3 activated charcoal and Kim.

4 2026 HANDLING SUNSET REVIEWS: Activated charcoal
5 BOARD MEMBER HUSEMAN: All right. Thank you,
6 Allison.

7 So at 605 -- sorry, 205.605(b), synthetics
8 allowed, we have activated charcoal. The board did request a
9 TR, so we do have a 2024 TR. Prior to that was a 2002 TAP.

10 The activated charcoal is used in processing for
11 mechanical filtration involving the physical separation of
12 suspended solids from a liquid passing through carbonate as a
13 porous medium in a column or bed. This type of filtration is
14 used as a taste and odor-removing agent and has a significant
15 amounts of different -- I guess it's used in different
16 applications.

17 We had a handful of commenters that both commented in
18 the spring and in the fall. All except for one was supportive
19 of relisting, and of course I now went on a different page. My
20 apologies.

21 There was one commenter that was against relisting
22 activated charcoal, and it was due to the steam, sorry, process
23 materials for filtration. Okay. The commenter had mentioned
24 that they would support relisting if it was required for steam,
25 if it requires steam activation. That was the only opposition,

1 and the rest were for relisting of activated charcoal.

2 Any questions?

3 BOARD MEMBER JOHNSON: Questions or comments for Kim?

4 CHAIR SMITH: Okay. The motion to remove activated
5 charcoal from the National List at 205.605(b)(2) was motioned
6 out of subcommittee by Kim and seconded by Jerry. The vote
7 starts with Allison.

8 BOARD MEMBER JOHNSON: No.

9 SECRETARY LEWIS: No.

10 VICE CHAIR BRUCH: No.

11 BOARD MEMBER QUARCOO: No.

12 BOARD MEMBER JEFFERY: No.

13 BOARD MEMBER POWELL-PALM: No.

14 BOARD MEMBER HUSEMAN: No.

15 BOARD MEMBER TURNER: No.

16 CHAIR SMITH: Logan?

17 BOARD MEMBER PETREY: No.

18 BOARD MEMBER D'AMORE: No.

19 BOARD MEMBER DIMITRI: No.

20 BOARD MEMBER NANDWANI: No.

21 BOARD MEMBER CALDWELL: No.

22 CHAIR SMITH: Chair votes no. This side of the room
23 got yelled at for saying their no's too fast.

24 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
25 zero recusals, one absent. The motion fails.

1 (Motion fails)

2 BOARD MEMBER JOHNSON: Thank you. Yeah, and a shout
3 out to Nate here who's operating with a clunky Excel
4 spreadsheet and trying to keep up with us, so thank you for
5 running through all these.

6 Next up is ascorbic acid with Nate Lewis.

7 2026 HANDLING SUNSET REVIEWS: Ascorbic Acid

8 SECRETARY LEWIS: All right, ascorbic acid. Let's
9 see. Also known as vitamin C, a vital nutrient for humans and
10 other folks. Let's see. I think -- sorry, I got too much
11 going on here.

12 Let me start again. Ascorbic acid is listed at
13 205.605(b)(6). It's a necessary ingredient in organic
14 processing. It's used as a dietary supplement and as a
15 nutrient flavor ingredient used in meat-containing products,
16 curing and pickling, and flour to improve baking quality, as an
17 antioxidant in fats and oils. And I wanted to note that there
18 have -- there are commenters who object to its inclusion on the
19 National List because of its functions as a preservative. And
20 I just want to remind folks that the restrictions on the
21 National List at 205.600 only apply to processing aids and
22 adjuvants, not to ingredients. And so ascorbic acid's role as
23 a preservative, as an ingredient, is an allowed use.

24 Public commenters also described some advancements in
25 natural alternatives, including organic juice powders. But

1 those are -- while those are effective replacements in some
2 products, they do have flavors included in them as they're
3 natural juice products, and they're not suitable in all
4 situations. It was unanimously relisted at its last sunset and
5 passed out of the subcommittee unanimously. And I'll be happy
6 to answer any questions if there are any.

7 BOARD MEMBER JOHNSON: Any questions on ascorbic
8 acid?

9 (No audible response)

10 BOARD MEMBER JOHNSON: Let's vote.

11 CHAIR SMITH: The motion to remove ascorbic acid from
12 the National List at 205.605(b)(6) comes before the Board,
13 motioned out of subcommittee by Nate Lewis, and seconded by
14 Jerry. And the vote starts with Nate Lewis.

15 SECRETARY LEWIS: No.

16 VICE CHAIR BRUCH: No.

17 BOARD MEMBER QUARCOO: No.

18 BOARD MEMBER JEFFERY: No.

19 BOARD MEMBER POWELL-PALM: No.

20 BOARD MEMBER HUSEMAN: No.

21 BOARD MEMBER TURNER: No.

22 CHAIR SMITH: Logan?

23 BOARD MEMBER PETREY: No.

24 BOARD MEMBER D'AMORE: No.

25 BOARD MEMBER DIMITRI: No.

1 BOARD MEMBER NANDWANI: No.

2 BOARD MEMBER CALDWELL: No.

3 BOARD MEMBER JOHNSON: No.

4 CHAIR SMITH: Chair votes no.

5 SECRETARY LEWIS: 14 yes. Sorry. Zero yes. 14 no.

6 Zero abstentions. Zero recusals. One absent. The motion
7 fails.

8 (Motion fails)

9 2026 HANDLING SUNSET REVIEWS: Collagen gel

10 BOARD MEMBER JOHNSON: All right. Next up, back to
11 Kim for collagen gel.

12 BOARD MEMBER HUSEMAN: Okay. Collagen gel, also
13 listed at 205.605(b). Collagen gel has a wide variety of uses.
14 It acts as an edible film to produce meat products.

15 I had a package up here of a meat product, an organic
16 meat product. I did read that that particular one, they didn't
17 use any kind of a casing. However, for organic meat products
18 like a sausage or something you want up on your charcuterie
19 board, there's a chance that a collagen gel or another type of
20 protectant would be used. It helps to not only preserve the
21 flavor, but then also the longevity of the product and the
22 shelf life.

23 In both public comment in the spring and public
24 comment here in the fall, consistency amongst the handful of
25 commenters supporting the relisting. They're -- we'll get into

1 this subject quite a bit of mentioning from commenters that
2 commercial availability of products needs to be evaluated. But
3 that being said, it was full support from both the subcommittee
4 and minus a commenter, all other support from public comment in
5 both oral and written comments.

6 BOARD MEMBER JOHNSON: Any comments or questions?

7 (No audible response)

8 BOARD MEMBER JOHNSON: Let's vote.

9 CHAIR SMITH: The motion to remove collagen gel from
10 the National List at 205.605(b)(13) was motioned out of
11 subcommittee by Kim and seconded by Allison. And the vote
12 starts with Amy.

13 VICE CHAIR BRUCH: No.

14 BOARD MEMBER QUARCOO: No.

15 BOARD MEMBER JEFFERY: No.

16 BOARD MEMBER POWELL-PALM: No.

17 BOARD MEMBER HUSEMAN: No.

18 BOARD MEMBER TURNER: No.

19 CHAIR SMITH: Logan?

20 BOARD MEMBER PETREY: No.

21 BOARD MEMBER D'AMORE: No.

22 BOARD MEMBER DIMITRI: No.

23 BOARD MEMBER NANDWANI: No.

24 BOARD MEMBER CALDWELL: No.

25 BOARD MEMBER JOHNSON: No.

1 SECRETARY LEWIS: No.

2 CHAIR SMITH: Chair votes no.

3 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
4 zero recusals, one absent. The motion fails.

5 (Motion fails)

6 2026 HANDLING SUNSET REVIEWS: Ferrous sulfate

7 BOARD MEMBER JOHNSON: Great. Thank you. Okay.

8 Moving right along, ferrous sulfate is at 605(b)(15)
9 for iron enrichment or fortification of foods when required by
10 regulation or recommended by an independent organization. This
11 is a form of an iron supplement that's added to flours and
12 cereal products to make an optional enriched claim. It is also
13 found in baked products and infant snacks like oat cereal, tea,
14 and biscuits. It was previously relisted unanimously with one
15 absence and was voted out of subcommittee unanimously as well,
16 with a few absences.

17 We received several comments in support of relisting
18 the material as well as a couple that didn't take a position.
19 One commenter did oppose relisting and noted that this should
20 be addressed under the nutrient vitamins, and minerals listing,
21 which is coming up in a few minutes, and that its use could be
22 avoided, using natural whole foods and it should only be used
23 when required by law.

24 I will note that this annotation is closer to a
25 requirement of use only by law than the current annotation for

1 nutrient, vitamins, and minerals. And again, I'll note here
2 that the commenter also noted their comments were not
3 acknowledged in the sunset documents for this material, so I
4 really apologize for that oversight and I'll make sure that
5 that concern is captured in this meeting's recommendation
6 document.

7 Any questions or comment?

8 (No audible response)

9 BOARD MEMBER JOHNSON: Okay.

10 CHAIR SMITH: The motion to remove ferrous sulfate
11 from the National List, listed at 205.605(b)(15), was motioned
12 out of subcommittee by Allison and seconded by Kim. And the
13 vote starts with Franklin.

14 BOARD MEMBER QUARCOO: No.

15 BOARD MEMBER JEFFERY: No.

16 BOARD MEMBER POWELL-PALM: No.

17 BOARD MEMBER HUSEMAN: No.

18 BOARD MEMBER TURNER: No.

19 BOARD MEMBER PETREY: No.

20 CHAIR SMITH: Logan?

21 BOARD MEMBER PETREY: No.

22 BOARD MEMBER D'AMORE: No.

23 BOARD MEMBER DIMITRI: No.

24 BOARD MEMBER NANDWANI: No.

25 BOARD MEMBER JOHNSON: No.

1 SECRETARY LEWIS: No.

2 VICE CHAIR BRUCH: No.

3 CHAIR SMITH: Chair votes no.

4 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
5 zero recusals, one absent. The motion fails.

6 (Motion fails)

7 BOARD MEMBER JOHNSON: All right. On to hydrogen
8 peroxide with Wood.

9 2026 HANDLING SUNSET REVIEWS: Hydrogen Peroxide

10 BOARD MEMBER TURNER: Great. I have a listing at
11 605(b). I'll be using the summary process to review this
12 material.

13 This is hydrogen peroxide. It's a common
14 disinfectant and sanitizer used widely throughout organic
15 production. It has been unanimously relisted, kept without
16 dissent, in the past. And our discussion through subcommittee
17 was consistent with that.

18 We received significant support across the community.
19 Every kind of stakeholder supports this material. And we're
20 not recommending it for removal.

21 BOARD MEMBER JOHNSON: Thanks, Wood.

22 Any comments or questions?

23 (No audible response)

24 BOARD MEMBER JOHNSON: Okay. Let's vote.

25 CHAIR SMITH: The motion to remove hydrogen peroxide

1 from the National List at 205.605(b)(17) was motioned out of
2 subcommittee by Wood and seconded by Jerry. And the vote
3 starts with Mindee.

4 BOARD MEMBER JEFFERY: No.

5 BOARD MEMBER POWELL-PALM: No.

6 BOARD MEMBER HUSEMAN: No.

7 BOARD MEMBER TURNER: No.

8 CHAIR SMITH: Logan?

9 BOARD MEMBER PETREY: No.

10 BOARD MEMBER D'AMORE: No.

11 BOARD MEMBER DIMITRI: No.

12 BOARD MEMBER NANDWANI: No.

13 BOARD MEMBER CALDWELL: No.

14 BOARD MEMBER JOHNSON: No.

15 SECRETARY LEWIS: No.

16 VICE CHAIR BRUCH: No.

17 BOARD MEMBER QUARCOO: No.

18 CHAIR SMITH: Chair votes no.

19 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
20 zero recusals, one absent. The motion fails.

21 (Motion fails)

22 2026 HANDLING SUNSET REVIEWS: Nutrient vitamins and minerals

23 BOARD MEMBER JOHNSON: All right. Our next step is
24 nutrient vitamins and minerals, which is listed at 605(b)(20).

25 And I alluded to this earlier, that this remains a slightly

1 tricky one because it has a bumpy history, let's say. So I
2 won't go through all of that again. We had a good discussion
3 in the spring. But essentially, the Board originally
4 recommended an annotation that looks like the one we saw for
5 ferrous sulfate that's focused on when supplementation is
6 required by law or recommended by a third party.

7 What we ended up with is the annotation that you see
8 today, which is a reference to an FDA guideline on
9 fortification and supplementation that essentially leaves it up
10 to the good description of a manufacturer. I think it's fair
11 to say that the limits of that reference have been pushed. And
12 the Board at various times throughout the process, the sunset
13 process of the last couple decades, have looked at fixing this,
14 offered different ideas, gone deep into the depths of what
15 could be done here. And yet the annotation remains the same.

16 So I think I probably confused you all a bit in the
17 spring going into that same sort of history and what do we do
18 and wrestling with the fact that this is a messy listing. We
19 continue to get comments that raise concerns about grouping
20 this whole class of nutrient vitamins and minerals together.
21 It gives us a less granular look at these materials. Some of
22 them may raise excluded methods issues. Some of them may raise
23 accessory nutrient or accessory -- what's the word I'm thinking
24 of?

25 BOARD MEMBER POWELL-PALM: Ancillary.

1 BOARD MEMBER JOHNSON: Ancillary. Thank you.
2 Ancillary substance issues and accessory nutrients are kind of
3 in a gray area still. So things that aren't like your iron
4 that you need if you have anemia, but do have some evidence of
5 supporting health and are widely used in the conventional
6 marketplace and are pretty important for certain organic
7 product classes to be able to compete.

8 So we received similar comments again this round,
9 some in favor of relisting, some in favor of unpacking this and
10 looking at each item individually. And I think sadly we end up
11 in the same place that we have been for the last several
12 sunsets, which is we don't really have a consensus on a new way
13 to move forward. It's pretty clear there's some inconsistency
14 in how certifiers are interpreting this listing, but no one's
15 really raising alarm bells about it right now.

16 So I think at this point it does make sense to keep
17 it on the list as it is and kind of put a call out to the
18 community that if this is a problem for you, I think a petition
19 is probably the way that we start to take up any new way to
20 deal with this listing. So welcome questions and discussion.

21 (No audible response)

22 BOARD MEMBER JOHNSON: All right. Let's vote.

23 CHAIR SMITH: The motion to remove nutrient vitamins
24 and minerals from the National List at 205.605(b)(20) was
25 motioned by Allison and seconded by Nate Lewis. And the vote

1 starts with Nate Powell-Palm.

2 BOARD MEMBER POWELL-PALM: No.

3 BOARD MEMBER HUSEMAN: No.

4 BOARD MEMBER TURNER: No.

5 CHAIR SMITH: Logan?

6 BOARD MEMBER PETREY: No.

7 BOARD MEMBER D'AMORE: No.

8 BOARD MEMBER DIMITRI: No.

9 BOARD MEMBER NANDWANI: No.

10 BOARD MEMBER CALDWELL: No.

11 BOARD MEMBER JOHNSON: No.

12 SECRETARY LEWIS: No.

13 VICE CHAIR BRUCH: No.

14 BOARD MEMBER QUARCOO: No.

15 BOARD MEMBER JEFFERY: No.

16 CHAIR SMITH: Chair votes no.

17 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
18 zero recusals, one absent. The motion fails.

19 (Motion fails)

20 BOARD MEMBER JOHNSON: All right. That wasn't so
21 painful. Next up is peracetic acid, peroxyacetic acid, and for
22 this one we're going back to Wood.

23 2026 HANDLING SUNSET REVIEWS: Peracetic acid and
24 Peroxyacetic acid

25 BOARD MEMBER TURNER: Thanks. I'd be remiss, if I,

1 in my last sanitizer presentation to not mention that, you
2 know, we, this is -- sanitizers as a whole have been an issue
3 for this Board for some time. We've never really prioritized
4 the process for figuring out how to review sanitizers in a
5 unique way in this process. And so I just want to leave that
6 behind for those who are going to stay on the Board, that, you
7 know, if it factors into your thinking on this subcommittee to
8 think about how to prioritize some work on that front over the
9 next several years, please do. It remains one of our top
10 research priorities, the sanitizer issue under handling, and so
11 I just want to make sure that anybody who's tracking this issue
12 carefully understands that we hear you and understand that and
13 recognize that there needs to be some kind of process that we
14 need to, that is yet to be defined about how to handle these
15 materials.

16 This will sound an awful lot like my last
17 presentation, but at 605(b), we've got peracetic and
18 peroxyacetic acid for use in washing and/or rinse water
19 according to FDA limitations, for use as a sanitizer on food
20 contact surfaces. Very common, we have a very common
21 disinfectant sanitizer here that has broad support from the
22 community.

23 We continue to receive and have received over several
24 cycles of strong support for keeping this in the toolkit. It's
25 important across the industry and across stakeholder groups,

1 and we're not recommending it for removal.

2 BOARD MEMBER JOHNSON: Thanks, Wood. Questions?
3 Comments?

4 (No audible response)

5 BOARD MEMBER JOHNSON: Let's vote.

6 CHAIR SMITH: The motion to remove peracetic acid
7 from the National List comes from the subcommittee, motioned by
8 Wood, seconded by Dilip, and the vote starts with Kim.

9 BOARD MEMBER HUSEMAN: No.

10 BOARD MEMBER TURNER: No.

11 CHAIR SMITH: Logan?

12 BOARD MEMBER PETREY: No.

13 BOARD MEMBER D'AMORE: No.

14 BOARD MEMBER DIMITRI: No.

15 BOARD MEMBER NANDWANI: No.

16 BOARD MEMBER CALDWELL: No.

17 BOARD MEMBER JOHNSON: No.

18 SECRETARY LEWIS: No.

19 VICE CHAIR BRUCH: No.

20 BOARD MEMBER QUARCOO: No.

21 BOARD MEMBER JEFFERY: No.

22 BOARD MEMBER POWELL-PALM: No.

23 CHAIR SMITH: Chair votes no.

24 SECRETARY LEWIS: Zero yes, 14 no, zero abstentions,
25 zero recusals, one absent. The motion fails.

1 (Motion fails)

2 BOARD MEMBER JOHNSON: All right. Okay. Next up are
3 a couple of phosphates with Logan, potassium phosphate and then
4 sodium acid pyrophosphate.

5 2026 HANDLING SUNSET REVIEWS: Potassium phosphate and Sodium
6 acid pyrophosphate

7 BOARD MEMBER PETREY: Thank you. Yeah, so potassium
8 phosphate is at 205.605(b), synthetics allowed. Potassium
9 phosphate for use only in agricultural products labeled "made
10 with organic" specific ingredients or food groups, prohibited
11 in agricultural products labeled organic. And, again, we did
12 go over this some in Carolyn's proposal, and -- but we'll get
13 into this review here.

14 Potassium phosphate can be used for pH control in
15 milk and dairy products, to make acidified milk products, and
16 in milk protein stabilization. Overall, the comments in the
17 spring and in the fall were in support of relisting. We did
18 have an opposition comment in the spring and also in the fall,
19 and stating that this was not necessary, that buttermilk,
20 vinegar, lemon juice could be used instead.

21 We did have a split vote in subcommittee, and a lot
22 of that was reflected in the discussion with the new petition.
23 And we did vote down the petition so that the annotation would
24 not change. But all previous boards have been unanimous in
25 voting this one through.

1 BOARD MEMBER JOHNSON: Thanks, Logan.

2 Any questions or discussion?

3 (No audible response)

4 BOARD MEMBER JOHNSON: All right. Let's vote.

5 CHAIR SMITH: The motion to remove potassium
6 phosphate from the National List at 205.605(b)(28) comes
7 motioned out of subcommittee by Logan, seconded by myself, and
8 the vote starts with Wood.

9 BOARD MEMBER TURNER: No.

10 CHAIR SMITH: Logan?

11 BOARD MEMBER PETREY: No.

12 BOARD MEMBER D'AMORE: No.

13 BOARD MEMBER DIMITRI: Yes.

14 BOARD MEMBER NANDWANI: No.

15 BOARD MEMBER CALDWELL: No.

16 BOARD MEMBER JOHNSON: No.

17 SECRETARY LEWIS: No.

18 VICE CHAIR BRUCH: No.

19 BOARD MEMBER QUARCOO: No.

20 BOARD MEMBER JEFFERY: No.

21 BOARD MEMBER POWELL-PALM: No.

22 BOARD MEMBER HUSEMAN: No.

23 CHAIR SMITH: Chair votes no.

24 SECRETARY LEWIS: One yes, 13 no, zero abstentions,
25 zero recusals, one absent. The motion fails.

1 (Motion fails)

2 BOARD MEMBER JOHNSON: Great, thank you. Next up,
3 sodium acid pyrophosphate.

4 2026 HANDLING SUNSET REVIEWS: Sodium acid pyrophosphate

5 BOARD MEMBER PETREY: Thank you. And for the record,
6 I said all boards voted against it, and it's the previous. I
7 did not - I don't have the tallying for every single board, so
8 I don't want that to go on record. But tricked ya. No, I'm
9 just kidding.

10 All right. Sodium acid pyrophosphate are referenced
11 at 205.605(b), synthetics allowed. It's for use only as a
12 leavening agent. This can be used -- has other uses in the
13 conventional setting, but, again, we limit it to that
14 restriction, and that is reflected in the comments that people
15 want to maintain that limitation.

16 All right. The previous vote record was unanimous
17 support for relisting as well, and our subcommittee vote was
18 also unanimous.

19 BOARD MEMBER JOHNSON: Thanks. Any discussion or
20 questions on this one?

21 (No audible response)

22 CHAIR SMITH: Okay. Sorry. Motion to remove sodium
23 acid pyrophosphate from the National List at 205.605(b)(30).
24 It was motioned out of subcommittee by Logan and seconded by
25 myself, and the vote starts with Logan.

1 BOARD MEMBER PETREY: No.

2 BOARD MEMBER D'AMORE: No.

3 BOARD MEMBER DIMITRI: No.

4 BOARD MEMBER NANDWANI: No.

5 BOARD MEMBER CALDWELL: No.

6 BOARD MEMBER JOHNSON: No.

7 SECRETARY LEWIS: No.

8 BOARD MEMBER QUARCOO: No.

9 BOARD MEMBER JEFFERY: No.

10 BOARD MEMBER POWELL-PALM: No.

11 BOARD MEMBER HUSEMAN: No.

12 BOARD MEMBER TURNER: No.

13 SECRETARY LEWIS: No.

14 CHAIR SMITH: Chair votes no.

15 SECRETARY LEWIS: Zero yes. Thirteen no. Zero
16 abstentions. Zero recusals. Two absent. The motion fails.

17 (Motion fails)

18 BOARD MEMBER JOHNSON: All right. Thank you, Logan.

19 This is our last 605 material, tocopherols. Over to Kyla.

20 2026 HANDLING SUNSET REVIEWS: Tocopherols

21 CHAIR SMITH: Yeah, tocopherols. I'm going to use
22 the summary review process listed at 205.605(b)(7) on the
23 synthetics part of the list. It's used as -- in processing as
24 an antioxidant ingredient. It was unanimously relisted at the
25 last sunset review and also unanimously voted out of

1 subcommittee.

2 Most commenters were in favor of relisting to the
3 stated position. A couple of comments did point out that in
4 the TR, there were several potential antioxidants listed, so
5 future boards may want to consider whether or not to add an
6 annotation such as, quote, "when other natural antioxidants are
7 not available/suitable." That's it.

8 BOARD MEMBER JOHNSON: Thank you. Any discussion or
9 questions?

10 (No audible response)

11 BOARD MEMBER JOHNSON: Let's vote.

12 CHAIR SMITH: Motion to remove tocopherols from the
13 National List at 205.605(b)(36) was motioned by myself out of
14 subcommittee and seconded by Dilip, and the vote starts with
15 Jerry.

16 BOARD MEMBER D'AMORE: No.

17 BOARD MEMBER DIMITRI: No.

18 BOARD MEMBER NANDWANI: No.

19 BOARD MEMBER CALDWELL: No.

20 BOARD MEMBER JOHNSON: No.

21 SECRETARY LEWIS: No.

22 BOARD MEMBER QUARCOO: No.

23 BOARD MEMBER JEFFERY: No.

24 BOARD MEMBER POWELL-PALM: No.

25 BOARD MEMBER HUSEMAN: No.

1 BOARD MEMBER TURNER: No.

2 CHAIR SMITH: Logan?

3 BOARD MEMBER PETREY: No.

4 CHAIR SMITH: Chair votes no.

5 SECRETARY LEWIS: Zero yes, 13 no, zero abstention,
6 zero recusals, two absent. The motion fails.

7 (Motion fails)

8 BOARD MEMBER JOHNSON: All right. So that concludes
9 605, and now we're moving on to 606, which is our nonorganic
10 agricultural ingredients that do have an explicit commercial
11 availability requirement attached to them. So this is where,
12 in addition to the other criteria, we're looking for
13 information about whether these ingredients are available in
14 sufficient quantities, qualities, et cetera, to meet the needs
15 of the market. So the first one is celery powder, which Wood
16 will present.

17 2026 HANDLING SUNSET REVIEWS: Celery powder

18 BOARD MEMBER TURNER: Thanks. Thanks to you,
19 Allison, for letting me have this be my last sunset. Thanks
20 for that.

21 We've got celery powder. We all know celery powder
22 well. It's listed at 606 as nonorganic agricultural allowed.
23 It's used as a processing agent for organic meats to
24 effectively cure those meats, although technically meats that
25 use celery powder don't carry -- aren't given the name cured.

1 They can't carry the name cured, so they're called uncured.

2 However, the conventional, as has long been indicated
3 from the community and those who follow this issue,
4 conventional celery and the powder that comes from it carry
5 significant nitrates, which creates a number of issues that
6 have been concerning to the community. A, the fact that
7 there's nitrates that are making their way into organic, and
8 sort of a number of human health issues related to nitrate
9 exposure.

10 But the issue has persisted that celery powder is,
11 organic celery powder has not existed in sufficient supply to
12 be able to meet the needs of the organic meat industry. And so
13 it's been a long-standing issue, a long-standing research
14 priority. I should say that, and I think we all know this,
15 Dr. Erin Silva from the University of Wisconsin-Madison has
16 presented interesting and exciting research that we could argue
17 comes out of our research priorities process. Someone
18 recognized an opportunity and moved toward it to try to figure
19 out other means of handling this kind of meat processing to be
20 more consistent and more appropriate with an organic. I think
21 there's a lot of exciting opportunities, and as she's indicated
22 to us, those opportunities are on the horizon.

23 So I think that's kept the subcommittee, I think even
24 though there has been dissent in the vote on the subcommittee,
25 consistent dissent across the board over the last sunset cycle,

1 we're not recommending it for removal at this point with the
2 belief that within the next -- within this next cycle, there
3 will be a clear reason to remove it from the National List
4 because of the availability of organic alternatives.

5 We consistently have heard from the community on
6 this. It's really a split in the community between the support
7 for the material and opposition to the material. The support
8 includes certifiers, consultants, producers, trade
9 associations. I thought it was interesting to think about one
10 commenter mentioned some organic celery powder supplier, celery
11 supply grown in Chile and shipped to China for production in
12 order to be able to produce some kind of organic celery powder,
13 which raised all kinds of other questions for me about how
14 we're getting this done. So I thought that was really quite
15 interesting or how to handle the issue, not how we're getting
16 it done, but how we're thinking about sort of meeting this
17 need.

18 Opposition has come from retailers, has come from
19 watchdogs and nonprofit organizations, from coalitions, from
20 consumers who raise all the issues that we've all talked about
21 here. And at the same time, I even appreciate even in that
22 opposition, those who have referenced the Silva research about
23 the opportunity here and being encouraged about what the future
24 is going to hold for alternatives to this material.

25 So I think with that, I'll open it up to discussion

1 if there is any, and we'll go from there.

2 BOARD MEMBER JOHNSON: Thanks for the really
3 comprehensive overview, Wood. This has been a fascinating one.
4 I saw, Brian?

5 BOARD MEMBER CALDWELL: Yeah, thanks, Wood. Did I
6 understand you correctly? Did you say that there was some
7 opposition from meat dealers? Oh.

8 SECRETARY LEWIS: I didn't say that, sorry. I said
9 retailers.

10 BOARD MEMBER CALDWELL: Oh, retailers. I see. Okay.

11 SECRETARY LEWIS: A retailer.

12 BOARD MEMBER CALDWELL: So, and what from retailers,
13 what was the opposition? What was the basis of that? Do you,
14 you know --

15 SECRETARY LEWIS: Consumer concern about the
16 material.

17 BOARD MEMBER CALDWELL: Okay. Yeah, I just want to
18 -- I guess I want to lay it out there that I'm, being a
19 recently ignorant consumer, I was quite surprised that the
20 whole --about the whole labeling thing that that, you know,
21 this is not considered to be --

22 SECRETARY LEWIS: It's cured, but uncured?

23 BOARD MEMBER CALDWELL: Cured, right. So anyways.
24 But yeah, thanks.

25 CHAIR SMITH: Nate?

1 SECRETARY LEWIS: I just think it's interesting that
2 the conversation about celery powder and curing and uncured is
3 here because this is on 606. So when and if we do have enough
4 organic powder, it will come off the list and we will no longer
5 have conversations at the Board about whether or not celery
6 powder is appropriate or not. So it's just kind of an
7 interesting dynamic that we have with the list. I'm just sort
8 of pointing it out that there's some benefit to the list
9 shining a spotlight on our food system. And when it's gone
10 from the list, we won't necessarily have those conversations.

11 BOARD MEMBER JOHNSON: Any other? Kim?

12 BOARD MEMBER HUSEMAN: Wood, do you know how much of
13 the organic meat market utilizes organic celery powder?

14 BOARD MEMBER TURNER: I don't.

15 BOARD MEMBER HUSEMAN: So if we were to consider
16 removing this, it would probably behoove us to know, maybe that
17 -- the answer to that?

18 BOARD MEMBER TURNER: All I know is the certifiers
19 who've indicated that the material shows up on the NOSBs. So I
20 think we've got at least if my if my math is right, at least 16
21 producers. But I don't know what the -- I have no idea what
22 the volume is.

23 BOARD MEMBER HUSEMAN: The volume is okay. Thank
24 you.

25 CHAIR SMITH: Nate?

1 BOARD MEMBER POWELL-PALM: I would echo how grateful
2 I was that Dr. Silva brought her research to inform us on this
3 subject. And I think it's another one where I think it's hard
4 to appreciate how difficult food manufacturing is. The supply
5 chains that go into it, how long they are, why we don't have
6 it. So I'm always really pleased and grateful to hear that
7 realism.

8 I mean, heck, we have a hard time making feed.
9 That's just grinding corn up into a mash, folks. And we can't
10 get that distributed right. So it's very hard to make celery
11 powder available across the board.

12 I think this is another great one, though, where if
13 we always and continuously ask, how can we get more data on
14 where we're at? And I've heard, you know, 606 described as a
15 list of opportunity. The second we're convinced that it's safe
16 to take off, there's going to be a lot of people who can make
17 some money who have invested in that space. And that's really
18 exciting. But I think sitting with this and saying we're going
19 to hold it to a high bar, that we're going to make sure we
20 don't lose this tool until we're really certain, and another
21 one would be exciting to have petitioned off with a lot of data
22 involved.

23 SECRETARY LEWIS: Yeah, I agree. And I just want to
24 say I don't know if there's other comments, but I just want to
25 say I hope the community does feel heard. It's not -- it's

1 rare that we get really strongly worded opposition to things.
2 And I and we read every word of it. So I do appreciate it. We
3 ponder it. We think about it long and hard. I have lots of
4 conversations about it. And I, you know, that there should be
5 no indication. I think sometimes I think about, you know, the
6 idea that our minds are made up all the time on these sunsets,
7 well before we even had conversations. That just isn't the
8 case. We're all working on these issues all the time and
9 bringing, you know, our best thinking into the, you know, into
10 this at the at the moment that we make our vote. So anyway, I
11 hope the community feels heard.

12 BOARD MEMBER JOHNSON: Thank you. Any other
13 comments, discussion?

14 (No audible response)

15 CHAIR SMITH: The motion to remove celery powder from
16 the National List at 205.606(c), comes motioned out of
17 subcommittee by Wood and seconded by Jerry. And the vote
18 starts with Carolyn.

19 BOARD MEMBER DIMITRI: Yes.

20 BOARD MEMBER NANDWANI: Yes.

21 BOARD MEMBER CALDWELL: No.

22 BOARD MEMBER JOHNSON: No.

23 SECRETARY LEWIS: No.

24 VICE CHAIR BRUCH: No.

25 BOARD MEMBER QUARCOO: Abstain.

1 BOARD MEMBER JEFFERY: No.

2 BOARD MEMBER POWELL-PALM: No.

3 BOARD MEMBER HUSEMAN: No.

4 BOARD MEMBER TURNER: No.

5 CHAIR SMITH: Logan?

6 BOARD MEMBER PETREY: No.

7 BOARD MEMBER D'AMORE: No.

8 CHAIR SMITH: Chair votes no.

9 SECRETARY LEWIS: This one's a little trickier. Two
10 yes, 11 no, one abstention, zero recusals, and one absent. The
11 motion fails.

12 (Motion fails)

13 BOARD MEMBER JOHNSON: All right. Thanks for that
14 discussion and all the work there.

15 All right. Heading back to Dilip with another late-
16 breaking development on the material, fish oil.

17 2026 HANDLING SUNSET REVIEWS: Fish oil

18 BOARD MEMBER NANDWANI: Thanks, Allison. First,
19 before I start, I'd like to echo what Wood mentioned, that we
20 do spend, the board members, a lot of time and review these
21 sunsets before coming to this stage, and well said, Wood.
22 Really appreciate your comments.

23 Fish oil, 205.606, nonorganic agriculture is allowed.
24 It's used in processing, organic processing and handling, as an
25 ingredient to increase the content of omega-3 fatty acids.

1 Sorry.

2 Okay. You want me to repeat, Michelle? That's okay?

3 Okay.

4 So, fish oil, 205.606, nonorganic agriculture is
5 allowed, and it's used in organic processing and handling as an
6 ingredient to increase the content of omega-3 fatty acids.

7 Okay. So we already discussed in the spring meeting the
8 details, the uses, and use in manufacture and the international
9 acceptance.

10 So I'll come to the discussion part because that's an
11 important one, and we have some new developments, actually,
12 just recently, like we earlier discussed in organic pullulan.
13 So the Handling Subcommittee discussed fish oil extraction, the
14 manufacturing process, and environmental issues. And
15 subcommittee do understand these challenges, with referencing
16 third--party standards in NOP regulations, but also remains
17 concerned about the environmental impacts of overfishing. The
18 subcommittee does not recommend removal at this time.

19 We got several comments on fish oil, and they
20 mentioned about -- they supported relisting of fish oil, and a
21 couple of organizations supported against relisting, because of
22 overfishing and contamination of marine environment. One
23 commenter responded to our question about aligning the fish oil
24 annotation with the Canadian annotation for fish oil use in
25 aquaculture, which references FAO Code of Conduct for

1 Responsible Fisheries. Commenter noted that this code of
2 conduct is almost 30 years old.

3 Another interesting comment we received recently, and
4 it brought to our attention, and it was submitted, which says
5 that the CAS, or the CAS number for fish oil is incorrect.

6 Since this came to our attention after subcommittee reviewed
7 the material, we haven't had an opportunity to hear from other
8 stakeholders on this, and we will take it back to subcommittee
9 and bring it back to this meeting in spring. So that's all I
10 have. Allison, thank you.

11 BOARD MEMBER JOHNSON: Thanks, Dilip. So we'll vote
12 on the sunset per usual, but this question about whether the
13 CAS numbers are correct, those are omega-3 fatty acid CAS
14 numbers that are listed there, and fish oil itself doesn't seem
15 to have a CAS number. So we'll take a close look at that and
16 just bring that back to you all in case there's any unexpected
17 implications of removing the CAS numbers here. So I wanted to
18 put that on everyone's radar for now, but we won't make any
19 decisions about that today.

20 Any discussion or questions? Kyla?

21 CHAIR SMITH: I just wanted to thank Dilip for all
22 your work on these complicated materials. I think I actually
23 like made the assignments last year and was like, oh, these go
24 together, and I think they're, you know, pretty
25 straightforward. And Dilip, I just want to say thank you for

1 all the hard work that you've done, because they turned out to
2 be a lot more complicated than maybe we anticipated. And I
3 know, you know, that you reached out to a lot of members to
4 really make sure you were prepared and understood your
5 materials, and so I just wanted to say thank you.

6 BOARD MEMBER NANDWANI: Thank you for the challenge
7 you gave me, Kyla. If everything is smooth, then what's the
8 fun? This is the fun part, you know. And then thanks to, you
9 know, Allison and a couple of other, we call them buddy, right?
10 They also helped me navigate through this, so I really
11 appreciate it. This is a wonderful board, you know. All the
12 members, I really appreciate. I cannot say less than, you
13 know, the past three -- this is my third year, and fantastic.
14 I stop here. Thank you.

15 BOARD MEMBER JOHNSON: Thank you, Dilip. And I'll
16 just say here, and I think we'll flag this for a couple more of
17 these materials, but the issue is posed by producing organic
18 ingredients in a marine environment that has contaminants
19 present and that has the potential to bring contamination to an
20 environment and that has a lot of finite resources, and it
21 continues to be a concern and a challenge, so I think it's
22 worth putting our heads together. You know, we have one
23 attempt at dealing with those issues that didn't make it
24 through the NOP stage, so I think that's our signal to keep
25 coming up with ideas and figure out something that could make

1 it through.

2 Any other comments or discussion?

3 (No audible response)

4 BOARD MEMBER JOHNSON: Kyla?

5 CHAIR SMITH: The motion to remove fish oil from the
6 National List at 205.606(f) was motioned out of subcommittee by
7 Dilip and seconded by Jerry, and the vote starts with Dilip.

8 BOARD MEMBER NANDWANI: No.

9 BOARD MEMBER CALDWELL: No.

10 BOARD MEMBER JOHNSON: No.

11 SECRETARY LEWIS: No.

12 VICE CHAIR BRUCH: No.

13 BOARD MEMBER QUARCOO: No.

14 BOARD MEMBER JEFFERY: No.

15 BOARD MEMBER POWELL-PALM: No.

16 BOARD MEMBER HUSEMAN: No.

17 BOARD MEMBER TURNER: Abstain.

18 CHAIR SMITH: Logan?

19 BOARD MEMBER PETREY: No.

20 BOARD MEMBER D'AMORE: No.

21 BOARD MEMBER DIMITRI: No.

22 CHAIR SMITH: Chair votes no.

23 SECRETARY LEWIS: Zero yes, 13 no, one abstentions --
24 one abstention, zero recusals, one absent. The motion fails.

25 (Motion fails)

1 BOARD MEMBER JOHNSON: Thank you. All right.

2 Gelatin, over to you, Kim.

3 2026 HANDLING SUNSET REVIEWS: Gelatin

4 BOARD MEMBER HUSEMAN: All right. Thank you.

5 Gelatin is another 205.606, nonorganic agriculture is allowed.

6 Gelatin, similar to collagen gel, has a wide range of products
7 that it is used for. Most, I guess most common, gelatin is
8 used as a fining agent in teas, juices, and wines. It's used
9 as a stabilizer, texturizer, thickener, and it's also used in
10 capsules amongst many other things, like gummy bears, desserts,
11 puddings, Jello's; the list can go on and on and on.

12 It seems like there's, like the way that my table
13 mate here has said, 606 has a lot of opportunity. And this is
14 another example of, although supported by the community for
15 relisting, continuous pushback from the community to say, where
16 are we at with this? And what's driving the industry to try to
17 remove these items from the National List? And I've pushed
18 back with some stakeholders saying, well, if you don't know,
19 how should we know? And if we don't know, how should you know?

20 So maybe I'm going to challenge the future boards
21 because I'm rolling off and can't do it myself. But maybe we
22 should have a 606 working group of sorts because I struggle
23 with the word commercial availability. I like data. I like
24 numbers. I want to feel confident that if we take something
25 off the National List, it's not what will manufacturers who are

1 needing products going to do and how are they going to
2 scramble? But how do we define, is it 3x, 4x? How do we
3 evolve with market condition changes? I don't know the answers
4 to that. But as I look at this, I will always -- I will
5 continue to struggle with that in mind.

6 So I just think that having more data to some of
7 these items would be helpful and create some more clear-cut
8 answers. And setting timelines, I think sometimes I was also
9 mentioning this, that sometimes when you say, okay. We've got
10 to get there, we've got to get there, it's like telling your
11 kid, stop doing that or else. Stop doing that or else. And
12 then kids are like, yeah, the or else just is to continue doing
13 it. So at that, I will yield my time with my final sunset on
14 the board.

15 BOARD MEMBER JOHNSON: Very relatable metaphor, Kim.
16 Thank you.

17 Discussion, comments, questions?

18 (No audible response)

19 BOARD MEMBER JOHNSON: All right. Let's vote on
20 gelatin.

21 CHAIR SMITH: Motion to remove gelatin from the
22 National List at 205.606(h) was motioned by Kim out of
23 subcommittee, and seconded by Carolyn, and the vote starts with
24 Brian.

25 BOARD MEMBER CALDWELL: No.

1 BOARD MEMBER JOHNSON: No.

2 SECRETARY LEWIS: No.

3 VICE CHAIR BRUCH: No.

4 BOARD MEMBER QUARCOO: No.

5 BOARD MEMBER JEFFERY: No.

6 BOARD MEMBER POWELL-PALM: No.

7 BOARD MEMBER HUSEMAN: No.

8 BOARD MEMBER TURNER: No.

9 CHAIR SMITH: Logan?

10 BOARD MEMBER PETREY: No.

11 BOARD MEMBER D'AMORE: No.

12 BOARD MEMBER DIMITRI: No.

13 BOARD MEMBER NANDWANI: No.

14 CHAIR SMITH: Chair votes no.

15 SECRETARY LEWIS: Zero votes no. Zero yes, 14 no,
16 zero abstentions, zero recusals, one absent. The motion fails.

17 (Motion fails)

18 BOARD MEMBER JOHNSON: All right. Next up is orange
19 pulp, dried.

20 2026 HANDLING SUNSET REVIEWS: Orange Pulp

21 CHAIR SMITH: Okay. So dried orange pulp is used as
22 a moisture retention agent and a fat substitute in baked goods,
23 pastas, salad dressings, confectionery, processed teas,
24 spreads, beverages, meat products, and frozen foods. Lots of
25 uses.

1 Orange pulp, dried is a byproduct of the orange juice
2 industry and is manufactured from the washed orange peel, core,
3 and rag, the membrane, remaining after juicing. The pulp is
4 then mechanically dewatered, stabilized with heat, dried and
5 mill-ground into a powder.

6 At the last review, there was a split vote on this
7 material, seven yes, five no, and one absent. You can see from
8 the subcommittee vote we also were split, so five yes, two no,
9 and two absent.

10 The comments reflect this split as well, so there
11 were, you know, some in favor of delisting, noting concerns
12 with the chemicals used in non-organic production, as well as
13 the lack of essentiality since organic orange pulp, dried is
14 available. The petitioner of this substance is actually now a
15 certified producer.

16 Those in favor of relisting gave general support of
17 many comments or many materials, I mean, on 605. And some also
18 sort of stated they would be in support of delisting if
19 evidence is provided concerning viable alternatives or the
20 availability of this as an organic product. So, you know,
21 similar, like I feel like we keep talking about the same thing,
22 with all these 606 materials, that the safe route is for, so
23 like to wait for a petition for removal. And I do feel like
24 this one has been being signaled for some time, and like, you
25 know, through the vote at the last round as well as at the

1 spring meeting. And we have not heard a resounding call for,
2 you know, needing this material.

3 And I also just have been thinking about stakeholder
4 engagement, like through this process, so, you know, Jenny's
5 given us our civics lessons multiple times this meeting around
6 the FACA process and then moving into the APA process. And so,
7 you know, it's important for stakeholders to be involved
8 throughout the entire process, because we haven't -- didn't
9 hear a lot about the need for this material, and so this one, I
10 feel like, is at risk and subject to fall off. And then
11 there's the whole APA process where sometimes boards have
12 recommended removal of a substance, and then it fails in the
13 rulemaking process, because that's when folks come out of the
14 woodwork. So anyway, just sort of a reminder that this is a
15 long process, and it involves many steps, and voices are needed
16 and throughout the entire process so that we can make sound
17 decisions. That's it.

18 BOARD MEMBER JOHNSON: Thanks, Kyla. Let's see, Amy
19 and then Nate Lewis.

20 VICE CHAIR BRUCH: Thank you, Kyla, for that
21 overview. Thank you, Allison.

22 I know, Kyla, you mentioned the one safe route is to
23 remove this for the petition. I would also like to piggyback
24 on that. We need to have data also in order to be comfortable
25 to remove this. Quantifiable data is helpful. Just the size

1 of the market and the amount of the organic product available,
2 I think, would inform our decisions. More clear, quantitative
3 data versus qualitative when we're making these assumptions.
4 Thank you.

5 BOARD MEMBER JOHNSON: Nate Lewis?

6 SECRETARY LEWIS: No.

7 BOARD MEMBER JOHNSON: I'll insert myself in and say
8 that I mentioned earlier when we were talking about research
9 that I had the misperception on celery powder before we dug
10 into it, that we just, is there enough organic celery? Let's
11 just do that, and there is actually a very technical barrier to
12 getting the right type of celery to use for celery powder.

13 Here, it seems to just be a byproduct of oranges. We
14 have a lot of organic oranges on the market, and in fact,
15 organic orange pulp, dried on the market. So we're thinking
16 about, is this necessary? We haven't heard comments really
17 supporting the necessity of keeping it on the list, and there
18 doesn't seem to be a particular technical barrier to
19 production. So it's a little bit different, I guess, from
20 celery powder, and in an interesting position at this point.

21 CHAIR SMITH: Yeah, I would concur that I do feel
22 like this one is slightly different, and that, you know,
23 certifiers do state the number of clients that are using this
24 material. And again, not all certifiers are responding to us,
25 so, you know, we do have a bit of a blind spot, but two, like

1 two is the count, compared to a lot of other materials on 606
2 that have a lot more uses.

3 BOARD MEMBER JOHNSON: Any other comments or
4 discussion?

5 CHAIR SMITH: I saw pointing at me.

6 BOARD MEMBER JOHNSON: Oh, I was like, I just had to
7 do a, who's voting first check. Okay. Are we ready?

8 BOARD MEMBER POWELL-PALM: I think Mindee had a quick
9 question.

10 BOARD MEMBER JOHNSON: Oh, sorry.

11 BOARD MEMBER JEFFERY: I just wanted to double check.
12 I heard -- I think I heard you say there is organic dried pulp
13 available on the market, and I think I heard you say the person
14 who petitioned for this to become part of the National List
15 Exceptions is now an organic producer, so we don't have any
16 fears around this. Manufacturing must be co-located because we
17 know it's being produced.

18 BOARD MEMBER JOHNSON: We know there is some supply
19 out there, yeah. To Amy's point earlier, I don't know that we
20 have numbers, but we're not hearing a demand to keep it, which
21 is one of the criteria: is it necessary? I don't think that's
22 there at this point. Anything else? I saw some, like, faces.

23 BOARD MEMBER POWELL-PALM: Yeah, thank you.

24 BOARD MEMBER JOHNSON: Me and Amy.

25 BOARD MEMBER POWELL-PALM: For me, I feel like it

1 would be inconsistent. I do recognize the difference, but I
2 think I would love for us to pursue this commercial
3 availability question with a little more intention than the
4 folks just didn't show up. And I don't mean that glibly at
5 all. I, like, I really appreciate that this is different. We
6 hear that there's product on the market.

7 I do think that the process to add these was a lot.
8 It took a lot to get these on the list, and so in being -- in
9 my own being consistent, I would like to see it stay on the
10 list until we've got a little more hard data to take it off.

11 BOARD MEMBER JOHNSON: Amy?

12 VICE CHAIR BRUCH: Yeah, actually, I'm trying to go
13 down memory lane. Providence meeting, Allison, you had a
14 substance, I believe, and I think there was only one person
15 that had it on their OSP, I believe. Does that ring a bell?

16 BOARD MEMBER JOHNSON: I couldn't tell you the
17 material, but it does ring a bell.

18 VICE CHAIR BRUCH: Okay. Yeah, and I remember we
19 were wrestling with the same thing. Allison, I believe, bless
20 your heart, I think you reached out to that individual or there
21 was something there that you got more information, and this
22 board made the decision because of one person needing this, we
23 need to maintain this item on the list.

24 So I think outreach is also important because, as
25 we've known from a farmer point of view, in past meetings, we

1 haven't had a lot of participation, but a lot of these
2 substances impact farmers. For various reasons, they didn't
3 participate. We're inviting them. They're showing up. So I
4 do think on these substances that we're considering removing,
5 we've got to invite these people, invite these voices to our
6 process. This is a really serious situation if we're not
7 getting the voices and the equation and we're making these
8 decisions without understanding each person's perspective in
9 the equation. So thank you. But thank you, Allison, for
10 jogging my memory. If you have any more to add on that
11 substance, go ahead.

12 BOARD MEMBER JOHNSON: Yeah, good memory. I think it
13 was potato starch.

14 VICE CHAIR BRUCH: Yes, it was.

15 BOARD MEMBER JOHNSON: And I think there, there is a
16 technical barrier. There's something about the process that
17 may have been holding back the organic option. I don't see
18 that present here, so that may be a distinction. But this is
19 digging into the archives. I don't go back, like, more than a
20 week right now.

21 Any other comments or discussion? Kim?

22 BOARD MEMBER HUSEMAN: Just quickly, I'm going to go
23 back and say it again. This might be a great opportunity for
24 us to look as a board at 606 manufacturers, and doing a cold
25 call. Hey, these are things that don't just stay here to live

1 here forever. Just so you know, you're at risk of expiration.
2 So prove your case to stay on it or understand you're at risk.
3 And maybe people do. Just wanting to throw that out there.

4 BOARD MEMBER JOHNSON: Yeah, it's a -- I think it's a
5 tricky thing to think about who carries which burdens in this
6 regulatory scheme. And it's something that we each have to
7 weigh with our own hats on. But as Kyla mentioned, we do also
8 have the fortunate buffer from where we sit that there will be
9 at least one more round of public comment on this if we did
10 propose removing it. Then it will go to a proposed rule via
11 the NOP and have another comment period. So that moment when
12 suddenly you realize something you need is at risk is another
13 kind of backstop on our process.

14 Nate, did I see a hand?

15 SECRETARY LEWIS: No.

16 BOARD MEMBER JOHNSON: Okay. I was going to say this
17 was a juicy one. Sorry. Can't help it.

18 Oh, Franklin, thank you.

19 BOARD MEMBER QUARCOO: Given the citrus industry,
20 there is a lot of pesticide application. We are talking about
21 the peels here. And depending upon what kind of pesticide it
22 is, the chemical composition, the oil peel oily, there are
23 certain things that go deeper than you can wash away. So that
24 gives me cause to pause.

25 BOARD MEMBER JOHNSON: Yeah, really good point. And

1 coatings on citrus are another consideration.

2 Okay. Now Nate.

3 SECRETARY LEWIS: All right. I think the other
4 factor, and these are really complex situations, and I think
5 consistency is important, but we also need to recognize that
6 each substance is used differently. And so just to contrast
7 this with celery powder, for example, like no celery powder
8 means no bacon. And that's a big difference to me than no fat
9 substitute in baked goods. So I don't really know what that
10 means, but I just am trying to like contrast the ramifications
11 of the substance. And I don't want to be glib about it, but I
12 do think it's important as we consider these discussions about
13 delisting, we need to think about what these ingredients enable
14 in terms of the farmers who are trying to sell into the
15 processed product marketplace.

16 BOARD MEMBER JOHNSON: Any final? Oh, Wood.

17 BOARD MEMBER TURNER: I just want to say, Nate,
18 candidly, that's -- I mean, that's a silly argument. I mean,
19 what matters to some people may not matter to other people. I
20 mean, the bacon issue, that just -- that wasn't a necessary
21 distinction in my opinion.

22 BOARD MEMBER JOHNSON: Let's vote.

23 CHAIR SMITH: Motion to remove orange pulp, dried
24 from the National List at 205.606(m) was motioned by myself and
25 seconded by Allison, and the vote starts with Allison.

1 BOARD MEMBER JOHNSON: Yes.

2 SECRETARY LEWIS: Yes.

3 VICE CHAIR BRUCH: No.

4 BOARD MEMBER QUARCOO: Yes.

5 BOARD MEMBER JEFFERY: I'm going to vote yes because
6 I like that the APA process involves a financial aspect.

7 BOARD MEMBER POWELL-PALM: I'm going to say no.

8 BOARD MEMBER HUSEMAN: I abstain.

9 BOARD MEMBER TURNER: Yes.

10 CHAIR SMITH: Logan?

11 BOARD MEMBER PETREY: No.

12 BOARD MEMBER D'AMORE: No.

13 BOARD MEMBER DIMITRI: Yes.

14 BOARD MEMBER NANDWANI: No.

15 BOARD MEMBER CALDWELL: Yes.

16 CHAIR SMITH: Chair votes yes.

17 BOARD MEMBER JOHNSON: You have some counting to do
18 there, Nate.

19 SECRETARY LEWIS: Yeah. Eight yes, five no, one
20 abstention, zero recusals, one absent. I believe the motion
21 fails. Yep. Okay.

22 (Motion fails)

23 BOARD MEMBER JOHNSON: All right. Thank you for a
24 really robust discussion on that one. I think it's to be
25 continued in five years or if something comes before us sooner.

1 Okay. To take us home here, we're going to shift
2 back to Dilip with two seaweeds, Pacific kombu and then wakame.

3 2026 HANDLING SUNSET REVIEWS: Pacific Kombu and Wakame

4 BOARD MEMBER NANDWANI: Okay, folks. Last two
5 sunsets, three long days almost coming to an end, so just bear
6 with me. These two are easier than compared to the two
7 previous ones. These are good.

8 Seaweeds, there are two: Pacific kombu, which is
9 botanically laminaria japonica. That's what they call it. And
10 the second seaweed we are going to discuss is wakame seaweed,
11 which is undaria pinnatifida. Okay.

12 Their use is in food, cosmetics, and fertilizers. We
13 talked in detail their manufacture and other details in the
14 spring meeting, so I will come to the discussion in public
15 comments. So public comments, they indicated that the two
16 seaweed materials should be reviewed within the broader context
17 of marine materials. And a stakeholder commented on
18 environmental concern in harvesting seaweeds, in the spring
19 meeting also. And there was extensive NOSB proposal on the
20 sustainable harvest of seaweed for use in organic products done
21 by a former NOSB member in 2020. And that document is
22 available and an important topic for the board review.

23 The handling subcommittee discussed seaweed
24 extraction, the manufacturing process, and environmental
25 issues. The subcommittee understands the challenges with

1 referencing the third-party standards in NOP regulations, but
2 also remains concerned about the environmental impacts of
3 harvesting seaweed. So we do understand. We did discuss and
4 review. And based on the comments we received and the board
5 discussions, the handling subcommittee is recommending that
6 wakame seaweed remain on the National List.

7 And finally, it was good to note that on the other
8 day, a Northwest TOPP program, one of the program researchers,
9 they talked about some new developments in research they are
10 doing on the seaweeds. That's all I have, Allison. Thank you.

11 BOARD MEMBER JOHNSON: Thanks, Dilip.

12 BOARD MEMBER TURNER: Congratulations.

13 BOARD MEMBER JOHNSON: Yeah, I really appreciated the
14 growth that we may see as a result of TOPP on Alaskan organic
15 seaweed production and also for giving me a new identity label
16 as a target seaweed consumer. I'll wear that with pride.

17 Any discussion or comments?

18 (No audible response)

19 BOARD MEMBER JOHNSON: All right. So we'll vote on
20 kombu and then on wakame.

21 2026 HANDLING SUNSET REVIEWS: Pacific kombu

22 CHAIR SMITH: The motion to remove seaweed Pacific
23 kombu from the National List at 205.606(q) was motioned out of
24 subcommittee by Dilip and seconded by Kim, and the vote starts
25 with Nate Lewis.

1 SECRETARY LEWIS: No.

2 VICE CHAIR BRUCH: No.

3 BOARD MEMBER QUARCOO: No.

4 BOARD MEMBER TURNER: No.

5 CHAIR SMITH: Wood?

6 BOARD MEMBER TURNER: Abstain.

7 CHAIR SMITH: Logan?

8 BOARD MEMBER PETREY: No.

9 BOARD MEMBER D'AMORE: No.

10 BOARD MEMBER DIMITRI: No.

11 BOARD MEMBER NANDWANI: No.

12 BOARD MEMBER CALDWELL: Abstain.

13 BOARD MEMBER JOHNSON: No.

14 CHAIR SMITH: Do you want to vote?

15 BOARD MEMBER HUSEMAN: Can I still vote?

16 CHAIR SMITH: Yeah.

17 BOARD MEMBER HUSEMAN: No.

18 CHAIR SMITH: Say it again, Nate.

19 BOARD MEMBER POWELL-PALM: No.

20 CHAIR SMITH: Chair votes no.

21 SECRETARY LEWIS: Zero, yes. Twelve, no. Two

22 abstentions. Zero recusals. One absent. The motion fails.

23 (Motion fails)

24 2026 HANDLING SUNSET REVIEWS: Wakame

25 CHAIR SMITH: The motion to remove wakame seaweed

1 from the National List at 205.606(t). The motion was made by
2 Dilip and seconded by Kim, and the vote starts with Amy.

3 VICE CHAIR BRUCH: No.

4 BOARD MEMBER QUARCOO: No.

5 BOARD MEMBER JEFFERY: No.

6 BOARD MEMBER POWELL-PALM: No.

7 BOARD MEMBER HUSEMAN: No.

8 BOARD MEMBER TURNER: Abstain.

9 CHAIR SMITH: Logan?

10 BOARD MEMBER PETREY: No.

11 BOARD MEMBER D'AMORE: No.

12 BOARD MEMBER DIMITRI: No.

13 BOARD MEMBER NANDWANI: No.

14 BOARD MEMBER CALDWELL: Abstain.

15 BOARD MEMBER JOHNSON: No.

16 SECRETARY LEWIS: No.

17 CHAIR SMITH: Chair votes no.

18 SECRETARY LEWIS: Zero yes. Thirteen, no. No. Zero
19 yes. Twelve, no. Two abstentions. Zero recusals. One
20 absent. The motion fails.

21 (Motion fails)

22 CHAIR SMITH: All right. That's it, team. Really
23 appreciate this subcommittee's efforts to get through a very
24 long sunset load, and we're going to do the same thing again
25 for next year, another heavy handling agenda. So thank you for

1 all the time you all put in, extra meetings, deep conversation.
2 And now to the rest of the board for, you know, poking holes in
3 our logic, continuing to make sure that we're thinking about
4 all of these issues from every angle that we can. So thank you
5 all. Good job, team.

6 Okay. We have one more vote. So, we are going to
7 move to the Deferred Vote section. We deferred the vote on
8 compost. Is that -- do you have the clicker, Allison? Sorry.
9 Hold on.

10 (Pause)

11 DEFERRED VOTES

12 CHAIR SMITH: Perfect. Okay. So I think we're going
13 to -- you can see the revised language that was proposed, and I
14 think we're going to do a friendly amendment vote. So I don't
15 -- Allison, since you made the friendly amendment, do you want
16 to, yeah, do you want to make the motion?

17 BOARD MEMBER JOHNSON: Yeah. I move to change the
18 motion. Oh, see, I --

19 BOARD MEMBER JEFFERY: Don't we also need the 205.203
20 section, because the language is there also, so it's a friendly
21 amendment left to both sections. And I don't think we have a
22 slide for another one, and I just want to check in about
23 process.

24 BOARD MEMBER JOHNSON: I don't think the motion is
25 tied to the slide, right? I can just say it.

1 CHAIR SMITH: I think that's fine, so long as people
2 -- we might need to put the language up. I don't know. Well,
3 yeah.

4 BOARD MEMBER JEFFERY: I just think it's important
5 that we're clear that both in the definition and in the
6 205.203, it says composted plant and animal material, which may
7 include, because there's an amendment there to that language,
8 too.

9 BOARD MEMBER JOHNSON: Correct.

10 BOARD MEMBER JEFFERY: So if we're clear on both of
11 those, can we just vote the friendly amendment for both of them
12 at once?

13 BOARD MEMBER JOHNSON: Yes.

14 BOARD MEMBER JEFFERY: Thank you.

15 BOARD MEMBER JOHNSON: Okay. Help me out if I get
16 this wrong. I move to make a technical amendment to the
17 proposal to amend 205.2 and 205.203 to strike the second use of
18 ", and/or" to replace the "and/or" with "which may include."

19 CHAIR SMITH: Nate?

20 SECRETARY LEWIS: I'll second that.

21 CHAIR SMITH: Okay. Board members, clear? Friendly
22 amendment covers both things. Thanks, Andrea, for your quick
23 fingers. The vote starts with Franklin. Just on the friendly
24 amendment, we're not voting on the actual thing yet. Just can
25 we swap the language? That's what we're voting on.

1 BOARD MEMBER QUARCOO: Yes.

2 BOARD MEMBER JEFFERY: Yes.

3 BOARD MEMBER POWELL-PALM: Yes.

4 BOARD MEMBER HUSEMAN: Yes.

5 BOARD MEMBER TURNER: Yes.

6 CHAIR SMITH: Logan?

7 BOARD MEMBER PETREY: Yes.

8 BOARD MEMBER D'AMORE: Yes.

9 BOARD MEMBER DIMITRI: Yes.

10 BOARD MEMBER NANDWANI: Yes.

11 BOARD MEMBER CALDWELL: Yes.

12 BOARD MEMBER JOHNSON: Yes.

13 SECRETARY LEWIS: Yes.

14 VICE CHAIR BRUCH: Yes.

15 CHAIR SMITH: Chair votes yes.

16 SECRETARY LEWIS: Fourteen yes. Zero no. Zero
17 abstentions. Zero recusals. One absent. The motion carries.

18 (Motion carries)

19 CHAIR SMITH: Okay. Now we are going to vote on the
20 proposed definition as shown on the screen, which was -- what?
21 Yeah, sorry. Which was motioned out of subcommittee by Mindee
22 and seconded by Amy.

23 Okay. Further discussion?

24 (No audible response)

25 CHAIR SMITH: Okay. This is exciting. The vote

1 starts with Mindee.

2 BOARD MEMBER JEFFERY: So to be clear, we're doing
3 two votes, right? One for the definition and one for the
4 practice amendment.

5 CHAIR SMITH: Correct. So this is just for the
6 definition.

7 BOARD MEMBER JEFFERY: Well, yes.

8 BOARD MEMBER POWELL-PALM: Yes.

9 BOARD MEMBER HUSEMAN: Yes.

10 BOARD MEMBER TURNER: Yes.

11 CHAIR SMITH: Logan?

12 BOARD MEMBER PETREY: Yes.

13 BOARD MEMBER D'AMORE: Yes.

14 BOARD MEMBER DIMITRI: Yes.

15 BOARD MEMBER NANDWANI: Yes.

16 BOARD MEMBER CALDWELL: Yes.

17 BOARD MEMBER JOHNSON: Yes.

18 SECRETARY LEWIS: Yes.

19 VICE CHAIR BRUCH: Yes.

20 BOARD MEMBER QUARCOO: Yes.

21 CHAIR SMITH: Chair votes yes.

22 SECRETARY LEWIS: Fourteen yes. Zero no. Zero
23 abstentions. Zero recusals. One absent. The motion carries.

24 (Motion carries)

25 CHAIR SMITH: Okay. Last vote. We're doing it.

1 Okay. So the -- now, we are voting on the revised
2 language at the practice standard as shown on the screen here.
3 It was motioned out of subcommittee by Mindee and seconded by
4 Logan. And the vote starts with Nate Powell-Palm.

5 BOARD MEMBER POWELL-PALM: You betcha, yes.

6 BOARD MEMBER HUSEMAN: Yes.

7 CHAIR SMITH: Logan?

8 BOARD MEMBER PETREY: Yes.

9 BOARD MEMBER D'AMORE: Yes.

10 BOARD MEMBER DIMITRI: Yes.

11 BOARD MEMBER NANDWANI: Yes.

12 BOARD MEMBER CALDWELL: Yes.

13 BOARD MEMBER JOHNSON: Yes.

14 SECRETARY LEWIS: Yes.

15 VICE CHAIR BRUCH: Yes.

16 BOARD MEMBER QUARCOO: Yes.

17 BOARD MEMBER JEFFERY: Yes.

18 CHAIR SMITH: Chair votes yes.

19 SECRETARY LEWIS: 14 yes, zero no, zero abstentions,
20 zero recusals, 1 absent. The motion carries.

21 (Motion carries)

22 CHAIR SMITH: Okay. Good job, team. That was a lot
23 of votes. I don't remember the tally, but it was a lot.

24 We are going to, we're going to keep going because we
25 have some people that got to scoot out of here. So we're going

1 to -- can I have the clicker?

2 So, yeah, we're going to look at the work agenda.

3 WORK AGENDA/MATERIALS UPDATE

4 CHAIR SMITH: Okay. Amy, do you want to talk about
5 CACS at all, work agenda items shown on the screen?

6 VICE CHAIR BRUCH: Sure, Kyla, thank you. The plan
7 will be to really, an opportunity to re-see some of these
8 documents. So proposal for residue testing for global supply
9 chain and guidance, and then a discussion document for the same
10 work title for a focus on regulation. We have the risk-based
11 certification. As it stands right now, we're looking to move
12 that to a proposal as well as consistency in organic seed use.
13 However, there could be some changes as internal subcommittee
14 deliberation continues on some of these more challenging
15 topics. Thank you.

16 CHAIR SMITH: Okay. And crops. Logan, do you want
17 to say anything about crops?

18 BOARD MEMBER PETREY: I'd like to -- sure. For
19 compost, I'd actually like to kick that to Nate if that's okay,
20 because I'm in the car.

21 SECRETARY LEWIS: Sure, so we're going to continue to
22 work on compost production for organic agriculture as it
23 relates to products that are quote, unquote "compostable" as
24 defined by three separate ASTM standards. As I mentioned, we
25 recently ordered a TR for these substances. We'll be reviewing

1 them, potentially bringing a National List motion for the
2 spring vote.

3 CHAIR SMITH: We also have pear ester. We talked
4 about that. We'll be considering whether or not, yeah, to
5 broadly list carbons or what to do with pear esters. We'll
6 figure that out and move to hopefully a proposal for the
7 spring.

8 And then we also have our 2027 sunsets. They are ,
9 sorry, listed there. Okay. Allison, do you want to say
10 anything about these items?

11 BOARD MEMBER JOHNSON: Yeah, we covered both of these
12 items today. And so we'll be coming back for hopefully a vote
13 on the ethylene annotation change and taking one more cut at
14 the L-malic acid reclassification. And then that late breaking
15 item, sorry we had no time between handling and getting here,
16 but fish oil CAS number clarification is hopefully something
17 we'll come back with as well. And then many, many, many, many
18 sunsets.

19 CHAIR SMITH: It's a return of the colors, guys, so,
20 you know, that expands our list quite a bit. And so yeah, and
21 we'll just -- we'll make sure to get that -- the fish, like,
22 CAS numbers on the work agenda table so that we can maintain
23 transparency and you guys can remember that we're continuing to
24 look at that. Here -- so yeah, handling has two slides for all
25 of our sunsets.

1 Livestock. Brian, did you want to say anything?

2 BOARD MEMBER CALDWELL: Yeah, I apologize. I don't
3 -- I'm not aware of the process for this. So I'm hoping that
4 we can request at least one new work agenda item. And
5 basically from the stakeholders in particular, organic pork,
6 swine production would be a possibility. And also management
7 of livestock and crops in the agroforestry systems was brought
8 up. So my committee has not heard that before. So that came
9 into my attention from some of the comments. So I guess I
10 don't remember what the procedure is for this.

11 CHAIR SMITH: Yeah, we'll talk about it in livestock.
12 And then if there's a recommendation, that will go through the
13 executive committee and then to the Program. In addition to
14 the iodine annotation change that got sent back, we also have a
15 handful of sunsets.

16 Materials. Franklin, did you want to say anything
17 about any of these items?

18 BOARD MEMBER QUARCOO: When it comes to excluded
19 matters, we are already on our way. Dilip and I received an
20 email from a professor in genetics and breeding already
21 offering to, so I guess the call for assistance, well, I think
22 within 10, 15 minutes we got that email from -- so we are well
23 on our way. That's all I will add.

24 CHAIR SMITH: Great. And then we'll continue the
25 work on research priorities as well. And then PPM, Nate, you

1 want to say anything?

2 SECRETARY LEWIS: Just continuing to work on member
3 guide updates. And we should, based on conversations, take a
4 look at our PPM again as a number of new ideas are coming up
5 that may require some adjustments there.

6 CHAIR SMITH: Okay. Oh, sorry. Go ahead, Franklin.

7 BOARD MEMBER QUARCOO: Yeah. When it comes to the
8 PPM, we have five new board members coming on. We live in an
9 AI world and we are using AI tools. There is some amount of
10 confidentiality in some of the things we handle. Is there a
11 policy on AI use in a way that ensures that -- sometimes then I
12 have to talk to an expert, and thank you, Kim, for that
13 information.

14 But, you know, sometimes when you are using AI tools,
15 let's think about I give AI tools some material to summarize.
16 Is there a two-way sharing? Do other people have access to the
17 information that I'm asking AI to summarize?

18 So we live in an AI world. I'm just saying that our
19 policy manual, if we can work on some policy regarding AI. And
20 I hear there are some companies that have websites that they
21 have AI built in there. It gives you some privacy to do
22 certain things without your staff going on it. But I'm not an
23 expert. But I'm just wondering whether it'll be important for
24 us to have some kind of AI policy. Yeah. Thank you.

25 SECRETARY LEWIS: Yeah, so as Franklin's pointing out

1 to share in advance, one of the parts of that PPM update, we'll
2 be looking at AI policies and whether those are necessary for
3 the Board.

4 BOARD MEMBER JEFFERY: Franklin just got himself
5 elected to PPM.

6 BOARD MEMBER QUARCOO: Yep.

7 OFFICER ELECTIONS

8 CHAIR SMITH: Okay. I think we're going to go to
9 officer elections. And we will start with the chair role.
10 Wait, hold on a second. I've got to hand out some cards.

11 Yeah. I think there's a certain color for it. Yeah.
12 That's okay. Here. Take those and pass that way.

13 SECRETARY LEWIS: There's three colors.

14 (Pause)

15 CHAIR SMITH: Okay. While we're getting the cards
16 situated, we're going to start with the chairperson role. And
17 so we'll take nominations. And we'll -- when we vote, we'll go
18 with white. That's the color I have. Go ahead, Nate.

19 BOARD MEMBER POWELL-PALM: In the spring of 2021, I
20 was the newly appointed chair of CACS. And I remember being in
21 the tractor driving in what became the worst drought of my
22 farming career. And I was just like really focused on getting
23 these gosh darn peas in the ground before I have to take off on
24 a plane to get to, you know, Ski Week. It was then virtual,
25 but out of my tractor.

1 And in my luckily soundproofed tractor, I just got a
2 text from Amy. And it was, hey, do you want to talk about
3 soybeans? And I'm like, I don't raise soybeans. I don't want
4 to talk about soybeans. And she's like, no, let me talk to you
5 about soybeans.

6 And she said, could we talk about like what the world
7 really looks like when we're talking about integrity, talking
8 about fraud, talking about what it means to my community, my
9 producer community to see these whiplashes in prices. At that
10 point, it was going really high because of COVID, very
11 different than today.

12 But when we got to Tuesday and she gave her
13 presentation, I think former Chair Steve Ely (phonetic) and I
14 were both just like, who is this person? Like she was so
15 prepared, had such fantastic slides, and then was, unbeknownst
16 to us, also making a new human. While we were all sitting
17 there saying, how does this person get this much done? And
18 that has only continued.

19 Every single time I talk to Amy, I think about,
20 beginning I was thinking about how are there not three of her
21 getting this much work done? But I sort of backed off that and
22 just said, how can I copy her as much as I can?

23 It is so inspiring to see the work you get done. And
24 particularly for me as a farmer, we have launched a
25 participation level from farmers in our process because of the

1 home you've made, Amy, and the invitation to participate that
2 you've facilitated. And I think that is what has made me most
3 excited about the work we've been able to do.

4 But on top of that, when someone asks me, what did I
5 do on the NOSB, I'm going to be able to say the entire list
6 that we had in CACS. That we have acres on certificates. We
7 talked about geolocating. We talked about being able to
8 actually meaningfully take the concerns of the constituents and
9 bring them to something that we might be able to impact. And I
10 think the service you've provided for being secretary and then
11 vice chair, the relationship you've cultivated with the Program
12 to understand exactly what can we do, what are the boundaries,
13 has been really, for me, an easy entree to saying and asking,
14 would you be our chair? And so I'd love to nominate you.

15 VICE CHAIR BRUCH: Thank you, Nate. That was really
16 beautiful. I humbly accept the nomination. I've seriously
17 considered this. And I commit to giving it my all if I can
18 earn your vote. Thank you.

19 CHAIR SMITH: Carolyn?

20 BOARD MEMBER DIMITRI: You know, I am not a
21 storyteller like Nate PP. I'm not sure anyone is, honestly.
22 When I look back on my time knowing you, I will think, wow,
23 that guy could talk.

24 So I'm an economist. I believe in efficiency. And
25 so I would like to nominate Allison, who I think is wonderfully

1 qualified, as she told us. Well, she didn't say it like that.
2 But when she introduced the handling subcommittee and she
3 talked about her career trajectory, I think she also is a
4 stellar candidate to lead us into the next year.

5 BOARD MEMBER JOHNSON: Thanks, Carolyn. I'd be
6 honored to serve you all if you'd like to have me.

7 CHAIR SMITH: Any other nominations? Okay. Since
8 I'm going to count the vote, that's what's happening since I'm
9 not running for an election -- officer election. So you can
10 give your white cards with your vote to me. Thank you.

11 (Pause)

12 CHAIR SMITH: Okay. The new chair of this board, a
13 well-deserved, Ms. Amy Bruch.

14 Okay. We will move to the vice chair role. We'll go
15 pink. And so nominations for vice chair.

16 Franklin?

17 BOARD MEMBER QUARCOO: I would like to nominate Nate
18 Lewis. He and I got on the Board at the same time. He's on
19 every subcommittee. He knows his way around everything. I
20 don't need to say too much, but we all know Nate.

21 SECRETARY LEWIS: Thanks, Franklin. I accept the
22 nomination.

23 CHAIR SMITH: Any other nominations? Oh, sorry.
24 Wood?

25 BOARD MEMBER TURNER: I'd like to nominate Allison.

1 BOARD MEMBER JOHNSON: Thank you. I'd be honored to
2 serve.

3 CHAIR SMITH: Any other nominations? Pink.

4 (Pause)

5 CHAIR SMITH: Okay. The next vice chair of this
6 board will be Allison.

7 BOARD MEMBER JOHNSON: Thank you.

8 CHAIR SMITH: Okay. Last vote. Secretary.
9 Nate?

10 BOARD MEMBER POWELL-PALM: What a gosh dang counter
11 that guy was. I'd like to nominate Nate Lewis for another
12 round of excellence.

13 SECRETARY LEWIS: I'll accept.

14 CHAIR SMITH: Anybody? Other nominations? Wood?

15 BOARD MEMBER TURNER: I'd love to nominate Franklin,
16 if he'd consider.

17 BOARD MEMBER QUARCOO: No.

18 CHAIR SMITH: Okay. With no other nominations, and
19 since Nate accepted, we don't need to vote, and we just, by
20 decree, announce -- what? Ascension. Thank you.

21 Okay. I think with that, do you guys want to take a
22 break before we do the outgoing members, or should we? Yeah.
23 Short break. Let's go -- let's come back at 3:15.

24 VICE CHAIR BRUCH: And I apologize, everybody. I
25 actually have to leave, so I'll be saying goodbye in this break

1 time.

2 (Break)

3 CHAIR SMITH: I know. You guys are, like, well
4 trained or something. I feel like that was, like, the
5 quietest, like, wrap down of conversations yet, so thank you.
6 We are nearing the end.

7 And now we're getting to the fun part of our
8 programming, where we're going to recognize our outgoing
9 members. And I'm going to turn the mic over to Jenny.

10 RECOGNITION OF OUTGOING BOARD MEMBERS

11 DR. TUCKER: Okay. Again, welcome back, everyone.
12 This is always kind of the bittersweet part of the program. I
13 would encourage you that if you are a crier, now is the time to
14 dig out those tissues from your bag, because I have a feeling,
15 yes, there will be some emotion shown, and that is good.

16 Before I actually go into the person-by-person
17 farewell, so the way we're going to do this is I'm going to
18 make just a couple of remarks about this group, overall. Then
19 from this mic, just -- and I'm saying this process as much for
20 me as for everybody else so I remember what I'm doing here.

21 I'm going to read some farewell remarks about each
22 person. The reason I'm reading them is this is not just my
23 thoughts. I kind of canvassed the NOP team to get me, what
24 would you say about this person as they depart the Board? And
25 it was really touching and poignant, the things they came up

1 with, so I would like to share the thoughts for each departing
2 person from not just me, but team NOP. And then I'm going to
3 give the person their plaque, and then that person will have a
4 few minutes to say some words. Okay?

5 CHAIR SMITH: I'm sorry, can we just find out where
6 Jerry is?

7 DR. TUCKER: Jerry has needed to depart, and so that
8 actually takes me right into kind of the opening comments about
9 this group overall. This group has been part of a board that
10 has experienced life and death and births and medical stuff and
11 family stuff and kept on going and have supported each other in
12 times of both sickness and health, and it's been really
13 remarkable.

14 This group came to -- I'm going to get a little teary
15 here -- this group came to Washington, D.C. in February 2020
16 for their training. And it was, so we had an in-person
17 training with them a month before COVID hit. And so their
18 first five meetings were virtual. And so I went back because I
19 was just thinking back, wow, that's been a long time.

20 And so I went back earlier today and I read the
21 transcripts from their first meeting. And so just as kind of a
22 reminder of where we were as a community at that time, the
23 strengthening organic enforcement proposed rule was still
24 sitting at OMB. So that hadn't gotten out of clearance at OMB.
25 Origin of livestock was in departmental clearance, but had a

1 really -- was having a really hard time getting out of
2 clearance. OLPP had been withdrawn, and the replacement OLPS
3 wasn't even on the radar. If you do a search on the
4 transcript, it's not even in there.

5 And at the time, I was celebrating the fact that NOP
6 had around mid-50s people. We are now at 87. So these folks,
7 these five people, have been through just a tremendous time,
8 both just in our lives as a country, but also this experience
9 as a board and as part of the broader National Organic Program.
10 So it really is just remarkable.

11 They are also the first class for whom we did the
12 Zoom clap. We hadn't learned the Zoom clap when they were
13 appointed to the board. So it really, again, has been an
14 incredible five years.

15 So their first five meetings were virtual online.
16 They then met up in Sacramento and then to Atlanta and then to
17 Rhode Island, then to Milwaukee and then here. And so I'm so
18 glad you guys did have meetings together, you know, across the
19 country. Also, you're the first to be part of the TOPP
20 launches and to be able to hear kind of the good work that has
21 been shaped over the years. So just it's -- it was just a nice
22 time to reflect on the board progress as we celebrate your
23 service.

24 Okay. I'm going to now go into kind of the
25 individual thoughts. Again, Jerry had to depart so but I do

1 still want to share some of the comments from our team about
2 Jerry. So boundless energy, commitment, passion, dedication,
3 digs into every topic to make the best, most informed decision,
4 deeply insightful, deeply and truly cares about the world
5 around him, kind soul who loves people.

6 So that was the input from the team. I think that
7 seemed right on point. So I'm going to hold up Jerry's plaque.
8 And so this is what all the plaques look like. And so we will
9 make sure that Jerry gets his plaque.

10 Okay. You know, given that Jerry isn't here, is
11 there anybody who would like to say anything about Jerry on the
12 Board? Since he can't really speak for himself because he
13 departed. But just to give him a moment, would anyone like to
14 say anything? It's okay if you don't. I'm putting everybody
15 on the spot.

16 BOARD MEMBER POWELL-PALM: He's going to feature
17 prominently in my departing remarks.

18 DR. TUCKER: Say it again?

19 BOARD MEMBER POWELL-PALM: So I'll say something a
20 little later about him.

21 DR. TUCKER: Okay. Okay.

22 CHAIR SMITH: Carolyn?

23 DR. TUCKER: Carolyn?

24 BOARD MEMBER DIMITRI: I'll say something. I really
25 have grown very fond of Jerry, especially because he really

1 took to my criticism that he was acting like a pedantic old
2 white man. And he -- and I tried to explain to him, like, why
3 people were offended or put off, and he just really understood.
4 And he went -- he tried to, like, go with it. It was really
5 very sweet.

6 DR. TUCKER: Kyla?

7 CHAIR SMITH: I've just enjoyed all of Jerry's
8 stories. Like, it's, like, incredible, the things that he's
9 done. And they vary so much. And you're like, what? Like,
10 you, I don't know, I can't even, like, it's just in how they
11 all weave together. Like he should write a book because the --
12 his life stories are pretty funny and wild.

13 DR. TUCKER: Nate?

14 SECRETARY LEWIS: And I've found in talking with
15 Jerry that, you know, oftentimes you kind of bring up a subject
16 and people have, you know, some exposure or experience to it.
17 Well, Jerry had, like, eight years in Saudi Arabia doing
18 exactly that thing.

19 DR. TUCKER: That thing.

20 SECRETARY LEWIS: Right? So I just feel the vast
21 depth of his history was so valuable in kind of understanding
22 kind of just really how the world works kind of behind the
23 scenes, behind the curtains. So that was really amazing
24 exposure.

25 BOARD MEMBER JOHNSON: I think Jerry has been

1 incredible in modeling having a perspective and being open to
2 persuasion. He and I have sat down together and spoken on
3 tricky topics, on sensitive topics, and I've always found him
4 to be thoughtful, open, and, like, we can have a really
5 meaningful dialogue. And that's not something you can say
6 about a lot of people. So I really have appreciated him for
7 that.

8 DR. TUCKER: Thanks.

9 BOARD MEMBER CALDWELL: I can't resist. When I first
10 was coming on to the NOSB, I got a phone call from Jerry, and
11 it was just so welcoming and, like, camaraderie was all there.
12 I really appreciated that right from the start. So I
13 considered him to have, like, the highest level of
14 interpersonal skills of kind of anybody almost that I know,
15 but, you know, we were working with. So I really appreciate
16 him.

17 BOARD MEMBER NANDWANI: I'll make a quick comment.
18 You know, others have already said it's been three years. And
19 then two things, very friendly, pleasing personality, of
20 course, and when I saw Javier's case, I mean, I didn't know
21 that, and how he took that, and that gives, you know, the
22 impression that how he takes care of the, you know, his fellow
23 board members or the friends or colleagues around him.

24 And secondly, I didn't get much time to discuss with
25 him, but whatever time I spent with him, and I was impressed to

1 see his international experience. Saudi Arabia, you told me,
2 but there are some other countries. I don't know, Turkey and
3 whatnot, really super, very international, you know, the
4 experience he had, so.

5 DR. TUCKER: We're going to make sure that he gets a
6 copy of this part of the transcript.

7 BOARD MEMBER QUARCOO: Following up on Dilip's, one
8 of the things I noticed is that he's very sensitive to what we
9 say around people from different backgrounds, and he's very
10 sensitive to that. But at the same time, he makes sure, if
11 there's a problem, he's going to address it. He's not going to
12 dance around it. So he -- he's able to combine these two
13 things and then say what needs to be said, but being sensitive
14 about people and the different backgrounds they come from.

15 DR. TUCKER: Okay. Well, given that Jerry couldn't
16 speak for himself, the voices that you just lent, that was
17 lovely. So thank you, everybody.

18 Next, we're moving on to Kim Huseman. Kim? All
19 right. Here's what the staff said, and which I have added my
20 voice to. Actually, the word that was most common in
21 describing Kim was generous. And so generous sharing of
22 expertise with others, kind, generous with her time, always
23 thoughtful with her answers, an amazing depth of knowledge in
24 so many areas needed by the Board, pragmatic, really broad
25 perspective, and can hold multiple conflicting truths and be

1 comfortable with that and evaluate that despite the complexity
2 of it, in a very gentle way.

3 So, Kim, thank you very, very, very much. I'm going
4 to bring your plaque to you now. Okay? And then you're going
5 to say a few words if you'd like.

6 BOARD MEMBER HUSEMAN: I'll use my time now for the
7 floor. So first off, thank you, Jenny. I -- you and I had
8 this conversation last night.

9 I remember where I was five years ago -- almost,
10 about five years ago, when you called me and asked if I was
11 ready to serve on the NOSB. And I also thought, gosh, what am
12 I going to be doing in five years? I'm going to have a
13 sophomore in high school. I can't even think about that. And
14 I have a sophomore in high school who is here today able to
15 witness this, so I wasn't going to cry.

16 To see the service and to see democracy at work, I'm
17 going to start with my favorite quote, which I used in my
18 application by a person named E.M. Tiffany. "I believe in the
19 future of agriculture with a faith born not of words but of
20 deeds." If anybody has ever worn the blue and gold FFA jacket,
21 you had to recite that creed. And it's true to my core that I
22 am so privileged to serve the agriculture community.

23 And in this role in organic agriculture, I have been
24 conflicted, coming from a conventional background and applying
25 my roots into this industry, my entire belief was to do what I

1 could to be a servant and lift this industry. And I've made
2 professional and personal changes to guide my path with that.

3 I'm going to go-around the room and just very quickly
4 explain how I feel. Each and every one of you have helped me
5 along this journey and cannot be more thankful. And it starts
6 with Jerry's absolute resolve of, you know, he'll say, you know
7 what, I just think that's absolute -- I'm not going to say it
8 for the transcript. But he would always help to center me.

9 And it's a small world when Carolyn, Dimitri, and I
10 know a similar person, even though we both live across the
11 continent, in other places of the U.S., and really enjoyed our
12 conversations around agriculture. And your perspective as an
13 economist just resonates with me.

14 Dilip and I have been on the handling committee
15 together. And I am so appreciative of the work that you have
16 done and how you are here to be a steward to the community as
17 well. And there's times I didn't know how to answer you, and I
18 just thought, oh, gosh, I'm so glad I didn't get that material.
19 I've always been appreciative of your lens.

20 I think I give the biggest gratitude to Brian because
21 I had the easiest time on livestock. And you've handled it so
22 well, and I just look forward to seeing this next semester with
23 you at that lead.

24 And Allison, I feel like the last meeting that we
25 had, you and I really connected. And the conversations that

1 we've had and to see your leadership and you having the
2 opportunity this year to help guide this group, I just really
3 commend you and look forward to seeing that happen.

4 Nate Lewis, I wish I could live inside of your brain
5 for about 30 seconds, and then I want to jump out because I
6 don't think I could handle it much longer. You are a wealth of
7 knowledge, and I'm excited to see what your assistance with
8 this community and being able to be a servant to this community
9 in the next few years on the Board will prove. You've moved
10 stuff along. I really appreciate that.

11 My -- I'll call her my next-door neighbor who is not
12 sitting at her desk right now, but having another grain farmer
13 and a person who understands that community. Amy, gosh, you're
14 going to move -- you are moving mountains, and I'm sitting back
15 watching it and in such awe.

16 Kyla is my sister from another state, too, in a
17 roundabout way, and I cannot -- I can handle about 30 seconds
18 inside of Nate's brain. I think I get a little bit more time
19 in yours. To know this certifier community and how you've
20 embraced it and the leader you are in that capacity is so
21 inspiring. And I am just -- I'm impressed with your leadership
22 this year, and I am so looking forward to when we are off the
23 Board and get to spend even more, hopefully even more, time
24 together.

25 I'm going to keep going with the board members real

1 quick. Franklin, you have blossomed this board meeting, and to
2 see you coming out of that first year or so and what you're
3 doing this year, I can only imagine what you're going to be in
4 year five and beyond.

5 Mindee, you're going to make me cry. You and I met
6 in February of 2020, and I had this instant connection to you,
7 and I have never known a person who's like, I'm a compost, for
8 true and true, and someone who lives and breathes this organic
9 space and gives it as much time that you do, you just, you
10 inspire me.

11 I guess we'll go up north to my brotherly neighbor
12 from Montana. I cannot tell a story like you can tell a story,
13 and I know that I'm going to be always learning and growing
14 from you. And what you give to the community of livestock and
15 how you and I have had this opportunity to really make a
16 movement is just incredible, and I know that you and I are not
17 even close to being done yet. So we've got a ways to go.

18 And last but not least, Wood. I wish I could unbox
19 your mind just a little bit sometimes, because I think you have
20 brought a perspective to this organic industry and serving on
21 the Board in your role. And when you say something, I'm like,
22 why didn't I think of that? I just, I really like the
23 perspective of what you come from, and I'm really appreciative
24 that you are growing organic ingredients in North Carolina.
25 It's a difficult space to grow crops. You're doing it, and you

1 come from an industry in this space, but I just, I'm super
2 excited to see where that goes.

3 Michelle, my geologist-born friend, I like just the
4 stories you and I would share, the connections with Colorado,
5 the inspiration you are, and how you have shepherded and helped
6 keep me between the ditches is forever thankful.

7 And then I will quickly end with saying,
8 Ms. Dr. Tucker, thank you. Thank you, thank you, thank you.
9 The organic community truly, truly is indebted to your
10 leadership and your spirit to this space, and I could not have
11 been more honored than to serve and do the best that I can
12 under your reign.

13 DR. TUCKER: Oh, my goodness. Thank you, Kim. That
14 was just beautiful.

15 Mindee Jeffery. All right. The one -- the word that
16 came up most often with Mindee will surprise no one. It is
17 passion. Yeah.

18 So passion shines in everything she does and in how
19 she mentors others. Sort of the chair behind the Chair in
20 mentoring other people and mentoring leadership. Clear
21 champion, passionate champion, and voice for the retailer side
22 of the market. Embraces the democratic process while also
23 holding integrity and equity highest in mind.

24 So thank you, Mindee, so much for your passion. I'm
25 going to bring you your plaque now. I just have to say, we

1 spelled it right. This is -- when we appointed Mindee, the
2 press release almost went out with her last name spelled wrong,
3 so now it's the first thing we check on everything.

4 BOARD MEMBER JEFFERY: When Dr. Tucker took over for
5 Myles McEvoy, I took the press release off the Internet and I
6 printed out a picture and I put it up in my office. And every
7 time I looked at it, either I prayed that you would have the
8 support you needed to succeed at this or I prayed that you
9 would be good for us. And after five years of sitting here,
10 and I'm pretty critical, and I read the subtext and I read the
11 room and I look long down the future and I can only express my
12 gratitude to you for who you are and how you lead us and how
13 you navigate Washington and how that benefits the organic food
14 and agriculture system. So thank you for this opportunity to
15 serve.

16 And as a board member, I also have to stop everything
17 and thank Michelle. And I think somewhere in the pantheon of
18 organic greatness, there's a special place for Michelle
19 Arsenault. You're a nervous system of the organic system's
20 success, and as they say on the Internet, I think you should be
21 protected at all costs. Thank you, Michelle, for picking up
22 the phone all the time. And I think too, as far as watching
23 what the NOP does and watching what the pain of administration
24 change does to change management, to all of you, I don't know
25 that any of us are ever going to know the depth of gratitude

1 that we owe all of our public servants, and so thank you very
2 much for that.

3 I became a compost maker almost at the same time I
4 became an NOSB member, and so the two are very intertwined for
5 me metaphorically in my life for how I process who I am and
6 what I'm supposed to be doing. And compost, it's so real to me
7 still, like it's still so new to me because I'm a new compost
8 maker and it's a miracle that I can make compost, that when I
9 get the opportunity to, like, pull open a pile and, like, I can
10 stand in a windrow that I got to make, and it smells like
11 elation to me. And I get to -- I'm sending this trust into the
12 world and this magic that nature gives us and that I got to be
13 a part of stewarding what it means to do that.

14 And for me, that's what organic is. That's what this
15 thing is. It's a tangible transmutation to good for the
16 benefit of all the beings that it touches, and that's what
17 organic is to the food system for me. It's a tangible
18 transmutation of the American food system, and it is for me
19 also a tangible transmutation of democracy in America.

20 And I'm so proud that I got to sit here. It really
21 is kind of my only career goal, and it really is I always
22 wanted to serve my country, but I knew I couldn't go to war,
23 and I never knew, like, what that was going to mean and then,
24 until I was, like, way older in life, and I really see the
25 peaceful revolution of what organic does in democracy, and I'm

1 so grateful for that.

2 And it's a privilege. And that's what we're supposed
3 to do with our privileges, is we're supposed to steward the
4 future. So, for me, organic isn't a privilege. It is a
5 privilege that we have that we get to use towards the
6 stewardship towards the good of all things. And I want every
7 single person who touches organic to know that I'm grateful,
8 and every person who came before me that touched organic and
9 made this organic system possible to know that I'm grateful and
10 that you are truly beautiful stewards of the future.

11 DR. TUCKER: Okay. Nate Powell-Palm. Natural leader
12 and champion of the organic community. So leadership was the
13 most common word with you.

14 Listens openly and kindly. I didn't say -- I didn't
15 write that, but I loved that. You know, I just thought it was
16 just so spot on.

17 Smart, knowledgeable, t *Daine McRae* ; openness
18 and willing to share his personal story and journey for the
19 good of the community.

20 So those were our staff's thoughts about your
21 leadership, and I want to make sure I acknowledge you were the
22 chair for two years. Yeah? So again, thank you so much. I'm
23 going to bring your plaque clock over now. We spelled this one
24 right, too.

25 BOARD MEMBER POWELL-PALM: I think out of everyone,

1 I'm the only one Michelle brought a box of tissues to, so I
2 think I have a right to uphold. I remember sitting on my
3 college hall dorm and listening to my classmates talk about how
4 nervous they were or what they were going to do with their
5 lives, whether they were going to get a job, whether they were
6 going to go into grad school. And I was super empathetic, but
7 I remember not sharing a single one of those concerns because I
8 knew exactly what I was going to do. I was going to go home
9 and I was going to farm. This was just me biding my time.

10 And about two weeks before my 21st birthday, I was
11 doing some research in the Caribbean with my brother, having a
12 great time, and we got a call that my sister had just been
13 killed. And I remember just thinking that from the moment I
14 was born until that moment, she had been the well source of my
15 bravery, that this was the person who took care of me, and when
16 she died, so did my bravery.

17 My NOSB journey started with a call from Jenny
18 Tucker, and I remember sitting in my kitchen and having an idea
19 that a call might be coming, and so when a 202 number flashed
20 up, I'm like, quick, Ma, give me your phone. I'm going to
21 record this. This is everything.

22 And I run into the other room, and the first thing
23 Jenny says, she's like, Nate, I just have to share that you
24 were born the year I graduated from college. And I was
25 thinking about how someone could have said that and meant it as

1 a "Careful kid, don't get too big for your britches." And
2 Jenny, at least how I took it, was like, nice job having a good
3 enough reputation that we are moving this quick, and I so
4 appreciate the confidence that you gave me from the beginning.

5 And so you said, hold on just a sec. Like, you know,
6 you might want to think about this. You might want to go ask
7 your family if this is the kind of commitment you're ready for.
8 And so I ran back into the kitchen and I asked my then
9 boyfriend, now husband, what do you think? And my ma. And
10 they're just both like, yes. And so I said, you betcha. Let's
11 do this.

12 And when I think about all of you, I just want to say
13 a few things. I wish Jerry were here, because I think on the
14 very first -- the first fall meeting of my NOSB term, we had a
15 material that was a little bit controversial. And I remember
16 calling him up. And as so many of you have alluded to, the
17 guy's James Bond. I mean, he's got everything going on of how
18 the world really works.

19 And he just sat there and listened to all of my
20 concerns. And he said, you know, you've really changed my mind
21 about how I was thinking about this. And I thought that there
22 are few chances to instill in a young kid's mind that his
23 opinion matters. And Jerry was that. Sorry.

24 DR. TUCKER: You're doing great.

25 BOARD MEMBER POWELL-PALM: And from the get-go, Jerry

1 has taught me that you are allowed to change your mind as many
2 times as it takes to get it right. And when I think about how
3 much time I've spent on the phone with Jerry trying to noodle
4 out whether or not we've got something right, I mean, I think
5 about I could track the number of hours in a tractor in a year
6 just by the number of hours I talked to Jerry while in that
7 tractor. And I'm so grateful for the time and attention that
8 when you have someone who really gets how the world works and
9 thinks that this community matters, that really gives, I think,
10 an incredible vote of confidence.

11 I'm going to go-around the room now. So Carolyn.
12 Carolyn has never cut me a break. And I am someone who, I
13 would say, has been used to folks giving the benefit of the
14 doubt, letting me run kind of wild. And no matter what it was,
15 I -- I'm going to plagiarize Kim here when I say, iron truly
16 sharpens iron. That whenever I have come up with an idea,
17 Carolyn has challenged it, and I am so grateful for never being
18 let off the hook because I think that that pressure always made
19 my ideas better, made me reconsider, made me think that my
20 arguments have to be just bulletproof if I'm going to get past
21 this brilliant person. And so thank you for putting the
22 pressure on and keeping it on.

23 Dilip was one of what I call my first classes, where
24 I was chair and I was tasked with onboarding his class. And a
25 few months into his term, he said, guys, I've got to take a

1 trip. I'm going to be gone. And I'm thinking in my mind a
2 couple of weeks. And he's like, I'm going to be gone like
3 three or four months. And I'm going to be in a time zone that
4 is about 12 hours different, so.

5 And I'm like, okay, how? And he's like, oh, I'll
6 still be on the call. And I'm like, this guy is going to show
7 up at midnight every single Tuesday so prepared, ready to go,
8 ready to take on the hardest things, and always with that just
9 lovely demeanor.

10 Brian proved to me that if everyone isn't with you,
11 you can't keep going forward. You have to convince everyone
12 that your ideas are worthy of execution. And I am so grateful.
13 I feel like I have never been so stressed out before a vote
14 trying to figure out, did I push Brian to understand my
15 position enough? And the amount of time he would take to make
16 his case and the amount of intention he listened with is
17 something that I will hold for I promise, ever. I will hold
18 that forever that I need to be the leader who's going to make
19 sure everyone's with me before we move forward.

20 I'm always stoked every time we get to say, Allison,
21 could you put your lawyer hat on? And as Amy might say, could
22 you be our legal eagle for a minute? Because I think that it
23 is a reflection of how important this work is when someone like
24 Alison, with those, as Carolyn said, amazing credentials, still
25 thinks our community is worth the time and worth the attention.

1 So thank you.

2 In 2015, I met my first other Nate in the world at a
3 little farming conference in Montana. And he said that, hey,
4 do you think you'd ever like to go to D.C. and talk to Congress
5 about farming? And he pointed me to where one of those farmer
6 scholarships were, much like our friends who invited farmers
7 here this round, and got me involved in the world of policy. I
8 think if you were to look at my trajectory, Nate is the
9 foundation of my policy inspiration.

10 But I would say that there is a difference between
11 having a senior person who's looking at you as a kid, saying,
12 you know, you should try something out, and someone I consider
13 to be an older brother, looking at me saying, you're close
14 enough in age to me that maybe we would be in competition for
15 being the shining stars in a room. And that has never been how
16 Nate's dealt it. He's always made room for my ideas, for
17 coaching me, and I am so grateful for it.

18 I'm going to pair Logan and Amy a little bit
19 together, because no matter how good I have been on this board,
20 or how much work I have done, I can't create another human.
21 And the fact that we had those two doing the best work of any
22 of us, while making five new humans on the board, made me
23 realize, again, just how special our community is. That we
24 attract someone who said, you know, I'm going to build a
25 family, and I'm also going to serve, that this is worth making

1 those two things happen. And I'm so grateful for both of them.

2 But I want to give a little special shout out to
3 Logan, who was my true first sparring partner. On ammonia
4 extracts, it would be Steve saying, all right, does anyone have
5 any questions? And both Logan and I slapping the table --
6 proverbially, it was virtual -- and going after each other.
7 And then after each day, that Tuesday and that Thursday, we
8 would call each other, and we'd say, we're okay, right? This
9 is not personal. And we would always say, absolutely. Love
10 this. This was great. I even got to the point where I was
11 confident, after that Thursday, to say, are you okay with me
12 being chair? And she's like, you betcha, buddy.

13 And I think that -- that's the America I want to live
14 in. With the election coming up, I think about how alienated
15 folks feel. How alone. And you all have said that we can
16 disagree. We can work together. We can fight, even as I'd say
17 some of us have. And at the end of the day, we're still going
18 to dinner together. And we're asking how each other's families
19 are. We're asking what we're excited about to do next summer.

20 We've talked a lot about all the work we've done in
21 CACS. And we, Amy and I, are really good and terrible
22 influences on each other because we will just amp each other up
23 to say, can we do this? What else can we do for our farming
24 community?

25 And inevitably, it comes down to Kyla. When we're

1 saying, what do you think about this idea? And Kyla has, I
2 would argue, the most skin in the game because any idea that we
3 come up with, that's a certifier problem. And Kyla never said,
4 and I have this image in my mind of two high schoolers running
5 in the hall to their teacher, me and Amy, to Kyla, saying,
6 we've got this idea.

7 Instead of Kyla running to the classroom and locking
8 the door, she would always be like, give that to me. That's
9 interesting. Maybe not exactly this way, but we'll figure out
10 how to do it. And that's a certain bravery that I don't think
11 any of us really have to go through, except you as a certifier.
12 This is your work. This is your life. And I'm so grateful you
13 gave us the time of day.

14 From -- I knew I would not like giving this speech,
15 because I will never be able to say enough to all of you. But
16 when I think about what Amy has done -- sorry, Amy, but I meant
17 Mindee for this one -- what Mindee has done for my life,
18 thinking that you can be an excellent leader and you can be
19 everything anybody else can be, I think about the worries I had
20 joining this board, that it would be kind of a mean place. It
21 was a rough place. And Mindee taught us all that it can be the
22 most empathetic, emotionally intelligent, passion-filled, but
23 also morally guided space that I've ever been. And I want to
24 say thank you.

25 I was sitting in the park with Kim after the 2022

1 Sacramento meeting, and I asked her, like, why organic? You
2 big chicken. Why do you care about organic? You're from
3 Wyoming. And if you think Montana's a small population, you
4 can have it for Wyoming. And I wouldn't say there's a whole
5 bunch of organics down there. And so I was really curious,
6 what was it about organic that attracted you?

7 And you told me, this is just how we've always eaten.
8 This is normal. We called it poverty before, where we would
9 just be shooting our own game, raising our own food, but
10 there's never a question that we're going to raise the best
11 food we possibly can. And when I thought the fact that we have
12 someone who is taking that sort of insight into such an
13 impactful space, like your work then, your work now, I am so
14 grateful that we have somehow convinced you to stick with us.

15 Wood initially give me a lot of heartburn, because I
16 could not figure out what it was that you were in this for,
17 what drove you. And over the years, I have come to see that
18 you will just not lose the forest for the trees. You will not
19 lose the big picture, that this work can change the world.
20 This work is the sort of work that it is a privilege to do.
21 And when I think about all of the options you have to be doing
22 work in other spaces, other kinds of work, I am so grateful
23 that we can keep you around and that you have chosen us to put
24 all of your incredible energy towards.

25 As my second class, Franklin came in with Nate, and I

1 -- and from the day, we happened to be at Expo West together
2 the day of his announcement, and I texted him, would you mind
3 taking five minutes just to meet with me? And I knew from the
4 second I met you, I am so grateful you picked us.

5 It's sort of like a TV show that you want. You don't
6 know what's going to happen next, but you are really eager to
7 tune in. And when I think about your expertise in forming this
8 world, both as an entomologist but also just as a brilliant
9 scientist, I am so excited to be in the audience watching you
10 work over the next few years. So thank you for choosing us.

11 I wrote this note to Michelle this summer, and I
12 wanted to read it here. Michelle has a tradition of wishing us
13 all a happy birthday, and it seems really minor, but it so
14 consistently facilitates a sense of belonging. And Michelle,
15 you have been our announcer-in-chief of our joy-filled days. I
16 love the tradition of wishing us all a happy birthday, and I
17 feel so wonderfully close with my fellow board members, when we
18 can both give and receive birthday wishes.

19 But you haven't stopped at only celebrating the good
20 stuff. You have, with such grace, held our grief when life
21 deals us blows, and you've covered for us when we want to keep
22 our challenges private but stay on top of our duties. And no
23 matter who we are or where we come from, you make us feel
24 equally welcomed and wanted. So thank you.

25 And lastly, Dr. Tucker. I just don't think we're

1 ever going to be able to appreciate enough what it was like to
2 work under your leadership. There will be books written trying
3 to dissect why was this time so good in our industry, and
4 there's a lot of things to praise you for. You're one of the
5 greatest speakers I've ever met, and I like to think of myself
6 as a guy who can talk, as Carolyn said. I just, I don't even
7 hold a candle to you. I mean, you are brilliant.

8 But what you taught me was that there's an honesty,
9 that when we can be honest with each other, we can do great
10 work. But to be honest, we need trust. And I really think and
11 thank you for trusting me during my leadership and trusting
12 everyone on this Board to do hard things.

13 You are the person who has strengthened my faith in
14 government. And I think it's really transformed how I think
15 about what I want my kids to do. If I have the smartest kid in
16 the class, I'm going to send them right to you. I want them to
17 be that public servant that says we can do everything, we can
18 do big things, and we're not going to hold back.

19 The Canadian scientist, Janet Elliott, who's a
20 professor at University of Alberta, said, there will be people
21 in your life who take away your bravery. Don't listen to them.
22 Surround yourself with the people who make you brave.

23 Thank you, NOSB, for the chance to surround myself
24 with people who make me brave. And I hope I was that person
25 for you all, and I hope we can be that person for every member

1 to come. Thank you, Kyla.

2 DR. TUCKER: Wood Turner. How are you feeling, Wood?
3 Okay.

4 Wood, the word that came up from my team and from me
5 the most here is intellect, just how smart you are. It's a
6 quiet intelligence, problem solver, careful and thoughtful,
7 poignant questions, brings deep, deep intellectual perspective.

8 And then this is my favorite. This, I think this is
9 so cool. Deadly precise in his analysis of topics. I thought
10 that was kind of cool.

11 You bring such a gravitas to this Board, and that
12 weight of thought and intellectual concern and depth is truly,
13 truly, truly a gift. I'm going to bring you your plaque now.

14 BOARD MEMBER TURNER: Thanks so much. I don't know
15 how to follow Nate, but that's been the story of the last five
16 years. You do not want to be the last person talking, that's
17 for sure.

18 It's really fitting to be in Portland because this is
19 where I've been building a blueberry supply chain the last ten
20 years, I mean, the organic blueberry supply chain. I mean
21 we've been -- I'm so proud of the beautiful organic blueberry
22 farms that we've been working on here just south of here, about
23 an hour and a half south of here. Improving biodiversity,
24 rebuilding ecosystems, storing atmospheric carbon. It's just,
25 I love it. And, you know, really proud of our packing fresh

1 blueberries, fresh organic blueberries in Salem, Oregon,
2 packing frozen organic blueberries in Vancouver, Washington.
3 This is like ground zero for me in so many ways. So it's great
4 to be here.

5 But before that, I was really, you know, I'd been at
6 Stonyfield before I started that work and, you know, really
7 used to watch the NOSB process with -- that my colleagues were
8 involved in who were deeply committed to participating in this
9 process. And I always wondered what it was about. And it was,
10 it just -- it still amazes me to think about five years ago
11 getting the call that I'd been appointed to the board because I
12 really felt like, you know, I was going to be standing on the
13 shoulders of giants, people that have built this industry for,
14 you know, the last several decades and beyond, including people
15 that I worked with at Stonyfield. And I just feel so honored
16 to have been here.

17 The timing is also fitting for me too because, as Kim
18 said, I'm preparing my family's farm in eastern North Carolina
19 for our first organic inspection here before the soybean
20 harvest in December. And it's -- I'm nervous. I mean, it's --
21 in the last several years, you know, not only am I advocating
22 for environmental improvement in the roles that I've played in
23 the places I've worked, but I'm also becoming a farmer. And I
24 just have an extraordinary respect for the farmers in the room,
25 all the things that you do. And I've learned so much from

1 those of you who put so much dedication into that work.

2 I think as I came onto the Board, I -- it was
3 important for me to say to everyone that I really believe
4 deeply in expanding organic acreage and expanding organic
5 markets. Where I grew up in eastern North Carolina, I don't
6 have any neighbors that really grow organically. It's not --
7 it's -- and it's also a very hard conversation to have about
8 really supporting, in a full-throated way, organic food. I've
9 been lucky enough to live in places where that -- I've seen the
10 opposite of that. I've lived in Seattle. I've lived in New
11 England. I've lived in California.

12 It's always been a reminder to me that I want where I
13 grew up to feel like those places too and the support that
14 those places have had for organic -- or growing organic
15 markets, particularly, you know, in a place where my family's
16 farm is. We are surrounded by factory hog farms. It's --
17 there's a reminder to me every single day what we're trying to
18 do and what we're up against here. So that timing is fitting
19 too, just what I'm heading into here.

20 I'm an introvert. You all know that. I try to be
21 thoughtful. I really value the relationships that I've built
22 on this board. And I'm really grateful to have been seen by
23 all of you.

24 I'm also very aware of the -- I didn't think I was
25 going to do this. I'm very aware of the particular societal

1 privileges that I carry and do not deserve. So I see all of
2 you as well.

3 I strongly believe this must be a 15-person board.
4 We have too much work to do for it not to be, and the workload
5 we've carried for the past three years. We also desperately
6 need more active farmer voices on this board. And I really
7 respectfully request that the Board -- that the Program
8 appoints six new members when it makes its next nominations.

9 I left D.C. almost 30 years ago. I lived in D.C. as
10 well. I left D.C. almost 30 years ago, convinced I would never
11 look back. But I -- but this opportunity to be a public
12 servant has meant the world to me in ways I never imagined. So
13 I appreciate all of you. I appreciate Michelle. I appreciate
14 Jenny. I appreciate the Program, everything we're trying to
15 do. And I want to make sure -- how can I subscribe to Friday
16 Fun? Can I get in? Can I get -- I need Friday Fun. Anybody
17 who's ever seen Friday Fun, it's saved me more times than I can
18 count. So thank you.

19 DR. TUCKER: I think that closes our farewells.
20 Thank you, everybody. That was just beautiful.

21 I'm going to turn it back to Kyla for -- what are we
22 doing next?

23 CHAIR SMITH: We have other business next.

24 BOARD MEMBER TURNER: That wasn't enough? That was
25 pretty good.

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OTHER BUSINESS AND CLOSING REMARKS

CHAIR SMITH: I know it's hard to, I don't -- like -- yeah, jump back into some work things perhaps after all those lovely remarks. But did anybody have anything else they wanted to talk about in other business? What? No, go ahead. You're the only hand I see, so.

BOARD MEMBER JOHNSON: Well, yeah. I think we just keep piling on the gratitude to our departing members and gratitude to those of us remaining to go through this transition that's coming up. I'm really excited to build on what we've had in my time here on the Board and see what's ahead. And I was reflecting this week on how well-run this process is and it's the stability and commitment of the NOP staff is just on display every meeting.

But especially this meeting, I was really stuck that Dr. Tucker, Michelle, Jared, and the call-of-friends, Angie, making the slides work perfectly. Everyone else from the NOP who's here is still in the room and making sure everything moves like clockwork behind the scenes. It's hard to imagine this service role without you making it so smooth and, you know, making our lives still a lot easier. I know it takes a huge amount of work from you all. So I just wanted to really make sure that we see you and appreciate your longevity and how your commitment to this process has made, I think, what we're

1 doing here possible and successful. So thank you.

2 And I also just wanted to close with a call to
3 action. You know, our role as the Board and our
4 recommendations to the Secretary of Agriculture are one piece
5 in the puzzle of what keeps organic strong and evolving. But
6 we have a whole world out there.

7 We have an election in two weeks. I hope everyone,
8 if you haven't already voted, is planning to use your voice in
9 our civic processes. And also that it doesn't stop on Election
10 Day. We'll be taking a pause from our subcommittee meetings
11 that day in recognition of the importance of everyone's vote.
12 But continue to engage with your members of Congress. Continue
13 to engage in the appropriations process that makes sure we can
14 pay this amazing staff to keep organic working every year. All
15 of these pieces matter, and we need you showing up in all of
16 these different spaces. So I really appreciate those of you
17 who are still with us to the very end of this meeting and
18 appreciate everyone out there who's showing up in every other
19 place where we need to be working to fit all these pieces
20 together. So thank you.

21 CHAIR SMITH: Thanks, Allison. We are on to closing
22 remarks. Is there a slide? Yes. Okay.

23 This slide. Oh, look at this. This is from this
24 meeting. Fast work again, guys. Look at this.

25 This slide shows our next meeting date. So join us

1 in warm Tempe, Arizona in next spring. And for me, I would
2 just say it was a real pleasure to be able to serve as your
3 chair for this past year. I was joking with Amy at the break
4 that I feel like I got the ..- I lucked out in my chair rotation
5 because I didn't have to onboard any new members. I was like
6 in the stability years. And so I'm just, yeah, looking forward
7 to being able to serve in that chair emeritus role and support
8 Amy and all of you in the next year. I'm going to really miss
9 you guys. Thank you.

10 BOARD MEMBER JEFFERY: Good job, Kyla, Madam Chair.

11 CHAIR SMITH: I was -.. the one good thing is that,
12 you know, in certification, people jump around a lot from
13 different certifiers to the NOP. And what I always acknowledge
14 in those transitions is that even though you're moving to a new
15 space, you're really not gone because we're a family. And I'm
16 really glad that you are part of our family. Okay. With that,
17 I'm going to turn it back over to Jenny.

18 DR. TUCKER: When I was going to give my very first
19 conference presentation, I was going to be on a panel, which I
20 was in my mid.20s. It was a very, very big deal. And I was
21 very, very nervous.

22 And I called my dad and told him how nervous I was.
23 And he said, you know, Jenny, you are starting in your career.
24 You are one voice in a conversation that started way before you
25 showed up. And it's going to be a conversation that's going to

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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2024 MEETING
PLACE: Portland, Oregon
DATE: October 24, 2024

was held according to the record, and that this is the
original, complete, true and accurate transcript which has been
compared to the recording accomplished at the hearing.



Elaine M. LaRosee,
Official Reporter

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