

NOSB COMMITTEE RECOMMENDATION

Form NOPLIST1. Committee Transmittal to NOSB

For NOSB Meeting: May 2008	Substance: Okra																								
Committee: Crops <input type="checkbox"/> Livestock <input type="checkbox"/> Handling <input checked="" type="checkbox"/> Petition is for: <u>For inclusion on the National List § 205.606</u>																									
A. Evaluation Criteria (Applicability noted for each category; Documentation attached) Criteria Satisfied? (see B below)																									
1. Impact on Humans and Environment	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>																								
2. Essential & Availability Criteria	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>																								
3. Compatibility & Consistency	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>																								
4. Commercial Supply is Fragile or Potentially Unavailable as Organic (only for 606)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>																								
B. Substance Fails Criteria Category: _____ Comments: _____ _____ _____																									
C. Proposed Annotation (if any): _____ _____ _____ Basis for annotation: To meet criteria above: _____ Other regulatory criteria: _____ Citation: _____																									
D. Recommended Committee Action & Vote (State Actual Motion): <u>For inclusion of Okra on the National List § 205.606</u> <i>Motion by: <u>Joe Smillie</u> Seconded: <u>Steve Demuri</u> Yes: <u>5</u> No: <u>0</u> Absent: <u>0</u> Abstain: <u>0</u> Recuse: <u>1</u></i>																									
<table border="1" style="border-collapse: collapse; width: 80%; margin: auto;"> <tr> <td style="padding: 2px;">Crops</td> <td style="padding: 2px;"></td> <td style="padding: 2px;">Agricultural</td> <td style="padding: 2px; text-align: center;"><input checked="" type="checkbox"/></td> <td style="padding: 2px;">Allowed¹</td> <td style="padding: 2px; text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td style="padding: 2px;">Livestock</td> <td style="padding: 2px;"></td> <td style="padding: 2px;">Non-Synthetic</td> <td style="padding: 2px;"></td> <td style="padding: 2px;">Prohibited²</td> <td style="padding: 2px;"></td> </tr> <tr> <td style="padding: 2px;">Handling</td> <td style="padding: 2px; text-align: center;"><input checked="" type="checkbox"/></td> <td style="padding: 2px;">Synthetic</td> <td style="padding: 2px;"></td> <td style="padding: 2px;">Rejected³</td> <td style="padding: 2px;"></td> </tr> <tr> <td style="padding: 2px;">No restriction</td> <td style="padding: 2px;"></td> <td style="padding: 2px;">Commercially Un-Available as Organic¹</td> <td style="padding: 2px; text-align: center;"><input checked="" type="checkbox"/></td> <td style="padding: 2px;">Deferred⁴</td> <td style="padding: 2px;"></td> </tr> </table>		Crops		Agricultural	<input checked="" type="checkbox"/>	Allowed ¹	<input checked="" type="checkbox"/>	Livestock		Non-Synthetic		Prohibited ²		Handling	<input checked="" type="checkbox"/>	Synthetic		Rejected ³		No restriction		Commercially Un-Available as Organic ¹	<input checked="" type="checkbox"/>	Deferred ⁴	
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1) Substance voted to be added as "allowed" on National List to § 205.606 _with Annotation (if any) Petitioner satisfied all criteria fo r Okra to be added to List 205.606																									
2) Substance to be added as "prohibited" on National List to § 205. _____with Annotation (if any) _____ _____ Describe why a prohibited substance: _____ _____																									
3) Substance was rejected by vote for amending National List to § 205. _____ Describe why material was rejected: _____ _____																									
4) Substance was recommended to be deferred because _____ _____ If follow-up needed, who will follow up _____																									
E. Approved by Committee Chair to transmit to NOSB: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;"> <u>Julie Weisman</u> Committee Chair </div> <div style="text-align: center;"> <u>March 30, 2008</u> Date </div> </div>																									

NOSB EVALUATION CRITERIA FOR SUBSTANCES ADDED TO THE NATIONAL LIST

Category 1. Adverse impacts on humans or the environment? Substance -Okra

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Are there adverse effects on environment from manufacture, use, or disposal? [§205.600 b.2]		X		Agricultural Product used as ingredient in food products and no longer in eco-system
2. Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3]		X		Agricultural Product
3. Is the substance harmful to the environment? [§6517c(1)(A)(i);6517(c)(2)(A)i]		X		Agricultural Product
4. Does the substance contain List 1, 2, or 3 inerts? [§6517 c (1)(B)(ii); 205.601(m)2]		X		Agricultural Product
5. Is there potential for detrimental chemical interaction with other materials used? [§6518 m.1]		X		Agricultural Product
6. Are there adverse biological and chemical interactions in agro-ecosystem? [§6518 m.5]		X		Agricultural Product
7. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5]		X		Agricultural Product
8. Is there a toxic or other adverse action of the material or its breakdown products? [§6518 m.2]		X		Agricultural Product
9. Is there undesirable persistence or concentration of the material or breakdown products in environment?[§6518 m.2]		X		Agricultural Product
10. Is there any harmful effect on human health? [§6517 c (1)(A)(i) ; 6517 c(2)(A)i; §6518 m.4]		X		Agricultural Product
11. Is there an adverse effect on human health as defined by applicable Federal regulations? [205.600 b.3]		X		
12. Is the substance GRAS when used according to FDA's good manufacturing practices? [§205.600 b.5]	X			
13. Does the substance contain residues of heavy metals or other contaminants in excess of FDA tolerances? [§205.600 b.5]		X		Doubtful

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 2. Is the Substance Essential for Organic Production? Substance - Okra

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance formulated or manufactured by a chemical process? [6502 (21)]		X		
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]			X	
3. Is the substance created by naturally occurring biological processes? [6502 (21)]			X	
4. Is there a natural source of the substance? [§205.600 b.1]			X	
5. Is there an organic substitute? [§205.600 b.1]			X	Being petitioned for 205.606
6. Is the substance essential for handling of organically produced agricultural products? [§205.600 b.6]			X	
7. Is there a wholly natural substitute product? [§6517 c (1)(A)(ii)]			X	
8. Is the substance used in handling, not synthetic, but not organically produced? [§6517 c (1)(B)(iii)]	X			Being petitioned for 205.606
9. Is there any alternative substances? [§6518 m.6]		X		
10. Is there another practice that would make the substance unnecessary? [§6518 m.6]		X		

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 3. Is the substance compatible with organic production practices? Substance - Okra

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance compatible with organic handling? [§205.600 b.2]			X	
2. Is the substance consistent with organic farming and handling? [§6517 c (1)(A)(iii); 6517 c (2)(A)(ii)]			X	
3. Is the substance compatible with a system of sustainable agriculture? [§6518 m.7]			X	
4. Is the nutritional quality of the food maintained with the substance? [§205.600 b.3]			X	
5. Is the primary use as a preservative? [§205.600 b.4]		X		
6. Is the primary use to recreate or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g., vitamin D in milk)? [205.600 b.4]		X		Complicated..it has those effects but not because they were lost in processing
7. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		X		
a. copper and sulfur compounds;				
b. toxins derived from bacteria;		X		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		X		
d. livestock parasiticides and medicines?		X		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		X		

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 4. Is the commercial supply of an agricultural substance as organic, fragile or potentially unavailable? [§6610, 6518, 6519, 205.2, 205.105 (d), 205.600 (c) 205.2, 205.105 (d), 205.600 (c)] **Substance - Okra**

Question	Yes	No	N/A	Comments on Information Provided (sufficient, plausible, reasonable, thorough, complete, unknown)
1. <u>Is the comparative description provided</u> as to why the non-organic form of the material /substance is necessary for use in organic handling?	X			The petitioner presented voluminous information and references that organic okra in commercial quantities was not available especially near, or transportable to, and IQF facility
2. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate form to fulfill an essential function in a system of organic handling?	X			An IQF facility needs to be located nearby and have capability to do okra
3. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate quality to fulfill an essential function in a system of organic handling?		X		Not the major issue but fresh okra does keep well
4. Does the current and historical industry information, research, or evidence provided explain how or why the material /substance cannot be obtained organically in the appropriate quantity to fulfill an essential function in a system of organic handling?	X			Paucity of organic growers and IQF facility capacity/availability
5. Does the industry information provided on material / substance non-availability as organic, include (but not limited to) the following: a. Regions of production (including factors such as climate and number of regions);	X			Reviewer phoned major IQF facilities and certification organizations including CCOF and they confirmed petitioner information citing non-availability. International information WAS provided
b. Number of suppliers and amount produced;	X			
c. Current and historical supplies related to weather events such as hurricanes, floods, and droughts that may temporarily halt production or destroy crops or supplies;	X			
d. Trade-related issues such as evidence of hoarding, war, trade barriers, or civil unrest that may temporarily restrict supplies; or		X		
e. Are there other issues which may present a challenge to a consistent supply?	X			Okra do not transport well