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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2023 ORAL COMMENT WEBINARS

Tuesday,

October 17, 2023, 12:00 p.m., EST

Held via Zoom for Government Webinar

1 National Organic Standards Board (NOSB) Members

2

3 Nate Powell-Palm, NOSB Chair

4 Mindee Jeffery, NOSB Vice Chair

5 Amy Bruch, NOSB Secretary

6 Brian Caldwell

7 Jerry D'Amore

8 Carolyn Dimitri

9 Kim Huseman

10 Allison Johnson

11 Kyla Smith

12 Nate Lewis

13 Dilip Nandwani

14 Logan Petrey

15 Franklin Quarcoo

16 Wood Turner

17 Javier Zamora (absent)

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21

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23

24

25

1 USDA/National Organic Program staff

2 Michelle Arsenault, Advisory Committee Specialist

3 Erin Healy, Division Director of Standards

4 Jared Clark, National List Manager, Standards

5 Andrea Holm, Agricultural Marketing Specialist, Standards

6 Johanna Mirenda, Agricultural Marketing Specialist,

7 Standards

8 Heather Kumar, NOSB Technical Support Staff

9 Esu Obu, NOSB Technical Support Staff

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

(Time: 12:00 p.m.)

1  
2  
3 MS. ARSENAULT: All right, I'm going to start the  
4 recording.

5 All right, welcome everybody to the first day of the  
6 National Organic Standards Board Comment Webinars. I think  
7 everyone is in from the waiting room. I have about 61  
8 participants on the line. I imagine that number will increase  
9 in a bit.

10 So, we're going to start off with a little  
11 housekeeping, and then I'm going to turn the mic over to Erin  
12 Healy, who's going to actually convene the meeting.

13 And on the screen for those of you who are only on  
14 the phone with us, I'll read what's on the screen and for --  
15 for those of you who are in the Zoom meeting, you can read  
16 along with me or see the slide projected on the screen.

17 You're going to be on -- attendees will be in muted  
18 mode and unable to unmute themselves. For those of you who  
19 were with us for the last couple of meetings, we had some Zoom  
20 bombers, so now we have to keep everyone muted I'm afraid. The  
21 chat is enabled, so in the center of the Zoom taskbar --  
22 wherever yours is floating on your screen -- you can chat with  
23 each other or relay technical difficulties to NOP. Chats  
24 aren't part of the public record and are not a public comment;  
25 we won't be answering questions. The Board won't be answering

1 questions in the chat. Closed Captioning is available in Zoom  
2 by clicking the "Live Transcript" button or sometimes it says  
3 "Close Caption" and "CC." You can adjust it to be on or off,  
4 and you can change the font size in it and so you can customize  
5 your personal view.

6           You don't need to use the raise -- actually, please  
7 do not use the "Raise Hand" feature; all commenters registered  
8 ahead of time and the Chair of the Board will call on people on  
9 the order of the -- in the order of the schedule.

10           You can customize your own Zoom view. You can  
11 rearrange what you see on your personal screen by going to the  
12 upper right corner and toggling between "Gallery View" and  
13 "Speaker View."

14           Also, when we share slides, if you go to the View  
15 Screen and find "Exit Full Screen" when we share the -- the  
16 slide it will take over your screen, so if you Exit Full Screen  
17 it will minimize it and you can see other things that are on  
18 your -- your computer. And no worries; changing the view that  
19 you have on your screen doesn't affect anyone else's screen, so  
20 everyone won't see what you're seeing.

21           If you're having technical problems, you can visit  
22 the [zoomhelpdesk@support.zoom.us](mailto:zoomhelpdesk@support.zoom.us). There's a number you can  
23 call. You can chat. You can e-mail them.

24           The webinar is being recorded and we'll have a  
25 transcript that will be posted on the NOP website as soon as

1 it's available after the in-person meeting.

2 All right, so next slide please, for speakers. There  
3 we go. Please make sure that your name is displayed in your  
4 video tile so we can locate you when it's your turn to speak.  
5 The NOP will send you a message; you'll probably get a pop up  
6 on screen that says, "The host has asked you to unmute  
7 yourself," then you will be able to turn your mic and camera on  
8 and off. You can also -- so, you can rename yourself by  
9 looking for -- either doing it in your Zoom tile in the upper  
10 right, or if you find yourself in the Participant List, there's  
11 a menu next to your name, you should be able to rename yourself  
12 from there.

13 If you're scheduled to speak, and we can't find you  
14 in the list of participants, we may send you a note in the chat  
15 box. Sometimes if you're on the phone we can't see your name  
16 associated with your phone number, so we may be hunting for  
17 people along the way so just keep an eye on the chat box.

18 When -- we will ask you to unmute yourself when  
19 you're called, so please unmute yourself. Turn your camera on  
20 if you want, that's optional, you don't have to be on camera.  
21 Both the mic and the camera, for folks who are new to Zoom, are  
22 in the lower left of the Zoom taskbar, and also next to your  
23 name in the Participant List. So, if you're on the phone only,  
24 and you don't have a mute button on your phone, you can use \*6  
25 to toggle between mute and unmute.

1           When you come to the mic -- so, the Board Chair will  
2 call your name. When you come to the mic we ask you state your  
3 name and affiliation for the record at the start of your  
4 comment. We have a transcriptionist on the line with us and  
5 she'll be recording that information. Each commenter will have  
6 three minutes to speak. We'll use a timer that will sound when  
7 your time is up. When you hear the beep, please finish your  
8 sentence and the timer will eventually be showing in my Zoom  
9 tile, and we're going to pin that on the screen so everybody  
10 will be able to see the -- the same -- the timer all the time.

11           At the end of their comments -- at the end of your  
12 comment, the NOSB Chair is going to invite the NOSB members to  
13 ask questions, so don't immediately mute yourselves and turn  
14 your mic off; we may have questions afterward.

15           Now, I'm going to turn the mic over to Erin Healy,  
16 who is the Director of the Standards Division at the National  
17 Organic Program, to call the meeting to order.

18           Erin.

19           MS. HEALY: Thank you, Michelle.

20           Hello everybody. I am Erin Healy, the Standards  
21 Division Director in the National Organic Program. Welcome to  
22 all of our National Organic Standards board members and our  
23 audience.

24           We continue to be grateful for our ability to engage  
25 in these virtual sessions, which allow people to participate

1 from wherever they are. To our public commenters, thank you  
2 again for engaging in this process to shape policy. I also  
3 thank our audience; you continue to be an important part of  
4 this public meeting process.

5 This webinar opens two days of public webinars this  
6 week, and then we will reconvene next week in person in  
7 Providence, Rhode Island. We do plan to live stream that  
8 meeting, as we did last spring. Meeting access information for  
9 all meeting segments is posted on the NOSB web page on the USDA  
10 website. And transcripts for all segments will be posted once  
11 completed.

12 This meeting, like other meetings of the National  
13 Organic Standards Board, will be run based on the Federal  
14 Advisory Committee Act, and the Board's policy and Procedures  
15 Manual. I will act as the Designated Federal Officer for these  
16 webinar segments. Nate Powell-Palm, our Board Chair, will take  
17 the helm for this session.

18 We remind everyone that this is an open and  
19 transparent process, so mutual respect is critical. We ask you  
20 in advance to avoid personal attacks and disparagement. This  
21 extends also to any chats that you share. If you disagree with  
22 the speaker's position, please be sure to provide them the same  
23 respect and grace that you would want for yourself.

24 And to close, I thank the members of the National  
25 Organics Program with us today, so that includes Michelle



1 Arsenault, Jared Clark, Andrea Holm, Joanna Miranda, and our  
2 two new NOSB technical support staff who will be helping the  
3 Board, Heather Kumar, and Esu Obu. This is a very impressive  
4 team. I am honored to work with them every day, and let's give  
5 them a big round of Zoom applause.

6 (Zoom applause.)

7 MS. HEALY: Thank you. I will now hand the mic back  
8 to Michelle, who will do a roll call of NOSB members and staff.

9 MS. ARSENAULT: Thanks Erin.

10 All right, NOSB members; Nate Powell-Palm.

11 CHAIR POWELL-PALM: Present. Good morning.

12 MS. ARSENAULT: Thank you. And for overcoming your  
13 computer challenges today.

14 Mindee --

15 CHAIR POWELL-PALM: That was the other Nate.

16 MS. ARSENAULT: Mindee Jeffrey.

17 VICE CHAIR JEFFREY: Good morning. Thank you  
18 everyone.

19 MS. ARSENAULT: Amy Bruch.

20 SECRETARY BRUCH: Good morning from the Midwest.

21 MS. ARSENAULT: Good morning, Amy.

22 Brian Caldwell.

23 BD. MEM. CALDWELL: Glad to see everybody. Here.

24 MS. ARSENAULT: Hi, Brian. Welcome.

25 Jerry D'Amore.

1 BD. MEM. D'AMORE: Good morning from California.

2 MS. ARSENAULT: Good morning, Jerry.

3 Carolyn Dimitri.

4 BD. MEM. DIMITRI: Morning everyone. I mean, good  
5 afternoon everyone. Excuse me; I forgot where I was.

6 MS. ARSENAULT: Good afternoon, Carolyn.

7 Kim Huseman.

8 BD. MEM. HUSEMAN: Good morning.

9 MS. ARSENAULT: Good morning.

10 Allison Johnson.

11 BD. MEM. JOHNSON: Here. Good morning.

12 MS. ARSENAULT: Good morning, Allison.

13 Kyla Smith.

14 BD. MEM. SMITH: Here. Hello, everybody.

15 MS. ARSENAULT: Hi, Kyla.

16 Nate Lewis.

17 BD. MEM. LEWIS: (No audible response.)

18 MS. ARSENAULT: Uh oh, Nate, can you not unmute  
19 yourself? I will ask you to unmute yourself. Apologies for  
20 that.

21 BD. MEM. LEWIS: Present.

22 MS. ARSENAULT: Thank you, Nate.

23 Dilip Nandwani.

24 BD. MEM. NANDWANI: Good morning. Present.

25 MS. ARSENAULT: Good morning.

1 Logan Petrey. Lincoln --

2 BD. MEM. PETREY: Good morning.

3 MS. ARSENAULT: Good morning.

4 Franklin Quarcoo.

5 BD. MEM. QUARCOO: Morning.

6 MS. ARSENAULT: Good morning

7 Wood Turner.

8 BD. MEM. TURNER: (No audible response.)

9 MS. ARSENAULT: Oh, Wood can't unmute, either.

10 Apologies. Let's see, this is why we're doing roll call this  
11 way, to mic test. I don't see you. All right.

12 BD. MEM. TURNER: I'm here.

13 MS. ARSENAULT: There we go. Thank you, Wood.

14 And Javier Zamora.

15 BD. MEM. ZAMORA: (No response.)

16 MS. ARSENAULT: All right, I note that Javier is  
17 absent.

18 All right, and Erin already introduced the NOP staff  
19 that are on the call for support. For speakers who have  
20 PowerPoint presentations, Jared Clark and Andrea Holm are going  
21 to be projecting slides, just so you know.

22 And now I'm going to hand off the mic to Nate Powell-  
23 Palm, the Chair of the NOSB to start the webinar.

24 CHAIR POWELL-PALM: Thank you, Michelle.

25 Gosh Dang, it is good to see all your faces. And to

1 see -- I'm really looking forward to seeing you next week in  
2 person.

3           We're in a special time in organics. Last week, we  
4 in Montana, had the immense privilege of hosting Under  
5 Secretary Jenny Lester Moffett to talk about TOPP and all of  
6 the incredible investments that are going on into our space  
7 right now, and so I hope we can both celebrate and work on the  
8 issues at hand today, and into next week, and I'm looking  
9 forward to hearing from everyone.

10           A few reminders that there is a policy in the Policy  
11 and Procedures Manual about public comments, and I think we  
12 have a slide for that. all speakers who will be recognized  
13 signed up during the registration period. Persons must give  
14 their names and affiliations for the record at the beginning of  
15 their public comment. Proxy speakers are not permitted.  
16 Individuals providing public comment shall refrain from making  
17 any personal attacks or remarks that might malign the character  
18 of any individual. Members of the public are asked to define  
19 clearly and succinctly the issues they wish to present before  
20 the board. This will give NOSB members a comprehensible idea  
21 of the speaker's concerns. I will call on speakers in the  
22 order of the spool and will announce the next person or two so  
23 that they can prepare. Please remember to state your name and  
24 affiliation one more time, and then we'll start the timer.

25           Board members will indicate to me if they have any

1 questions, and I will call on them. Only NOSB members are  
2 allowed to ask questions.

3 All right, so our first speaker today is going to be  
4 Alan Lewis --

5 MS. ARSENAULT: Excuse me.

6 CHAIR POWELL-PALM: -- followed by Mark Kastel. Oh  
7 yes.

8 MS. ARSENAULT: Can I interrupt you? Can I practice  
9 the speaker timer, just to make --

10 CHAIR POWELL-PALM: Please do.

11 MS. ARSENAULT: -- everyone can hear it? All right

12 CHAIR POWELL-PALM: Yes.

13 MS. ARSENAULT: Everyone can see it in my tile, I  
14 think.

15 CHAIR POWELL-PALM: Two. One.

16 (Timer test beep)

17 MS. ARSENAULT: Was it loud enough? Is it? Zoom  
18 filters the noises in the background; I just want to make sure  
19 it's okay.

20 CHAIR POWELL-PALM: I think it was good, yeah.

21 MS. ARSENAULT: Good. Excellent. Thank you

22 CHAIR POWELL-PALM: Thank you.

23 All right. So first up, Alan Lewis, followed by Mark  
24 Kastel, Elizabeth Bell, and then John Foster.

25 Alan, the floor is yours.

1 MS. ARSENAULT: Let's see if we can get --

2 MR. LEWIS: There we go.

3 MS. ARSENAULT: Okay.

4 MR. LEWIS: Thank you. Alan Lewis, I'm a member and  
5 active board member of a dozen organic and agricultural  
6 organizations, and as a sideline I work at Natural Grocers.  
7 And Chairman Powell-Palm, I'm much more comfortable going at  
8 the end of two days of speakers, but I ended up at the front,  
9 so let's start with an invocation: an invocation for the  
10 planet.

11 The families whose lives we touch, the workers,  
12 animals, insects, and critters of the soil, and may we all  
13 remember as we advocate for our own needs and wishes and  
14 desires that we maintain our sacred obligations to uphold the  
15 rights and needs of others, which is a fancy way of saying what  
16 you all just said.

17 I, in my travels, especially in the last few years,  
18 hear the -- the random comment "I don't need the USDA CO." "I  
19 don't need USDA organic. Organic doesn't matter." And I could  
20 push back against that, but as we start the day that has  
21 changed too "we," "We don't need the seal. We don't need the  
22 NOP." And please take this as a friendly challenge, but when  
23 core people across the world are not recognizing us as leaders  
24 in agriculture, leaders in social economic and personal  
25 development, and in the climate change I think we have a deeper

1 problem than maybe we want to admit, when you step outside the  
2 borders, and often inside our borders, the seal represents  
3 plantation agriculture. It stands for displacement of soil,  
4 communities' ecosystems across Mexico, Peru, and a good part of  
5 the rest of South America. That's a pretty big challenge for  
6 all of us and so as part of my invocation let's remember that  
7 we risk looking like Wiley Coyote; we've removed the soil under  
8 our feet, we've jumped off the cliff chasing this roadrunner of  
9 economic growth, and we have this oops look on our face and  
10 we're just trying to get back to soil-based organic and organic  
11 that's not just input oriented, and recognizes the people that  
12 agriculture touches

13 I'm going to leave some extra time there, and I just  
14 want to thank everybody, the board members who put so much work  
15 into it. I know it's a slog. It takes focus. And really I  
16 want you to feel appreciated. Same to the USDA staff there.

17 And Michelle doesn't get a thank you because she  
18 makes it all look so easy. I -- I think she does all of her  
19 work in a few hours a day and then goes home, which is a way to  
20 give you a big thanks.

21 So, I look forward to hearing my colleagues, and I  
22 turn it back to you, Chairman Powell-Palm.

23 CHAIR POWELL-PALM: Thank you so much for your  
24 comments.

25 Questions for Alan Lewis? Mindee, please go ahead.

1           VICE CHAIR JEFFREY: Thanks Alan for your  
2 perspective.

3           I'm wondering if in your conversations, you think  
4 people recognize us as policy leaders and unique in America's  
5 democracy and regulatory framework.

6           MR. LEWIS: Well, we'd have to define "we," and I  
7 don't want to test people's patience but no; we are driven by  
8 large corporate global interests and you -- we will hear the  
9 next two days calls for gene editing, calls for this, that, and  
10 the other that really benefit large plantation agriculture.  
11 So, if that's someone's frame of reference, and that's good for  
12 them, then yes, we're leaders. If you're Via Campesina, if  
13 you're the International Federation of Organic and Agriculture  
14 Movements, no. That's why there are so many groups rebuilding  
15 an ethic of organic that's not just input oriented.

16           So, in the small places where we have an impact by  
17 somehow maintaining the National List, perhaps. For everything  
18 else that is out of scope, absolutely not.

19           CHAIR POWELL-PALM: I have a quick question for you,  
20 Mr. Lewis.

21           MR. LEWIS: Oh, no.

22           CHAIR POWELL-PALM: And it's not -- I promise it's --  
23 it's a little bit of a call out, but I was just Googling around  
24 the other day, and I saw someone say that Natural Grocers has a  
25 private label regenerative egg now, and so I went to look up



1 this egg. And I was just so elated that it said, "Certified  
2 Organic Regenerative," and that you folks put as the foundation  
3 of regenerative that it's going to be certified organic. And I  
4 really can't -- can't thank you enough for that. I think when  
5 I called out how do we grow the organic market a few meetings  
6 ago, that's action right there.

7 MR. LEWIS: We have built our entire business on the  
8 organic seal, which is why when it's threatened we feel it so  
9 severely, so everything we do, we try to start with the seal.

10 When talk about regenerative, so people know, that's  
11 because we have a research team, and a video team, and a  
12 standards team that gets their boots on and goes out in the  
13 dirt every year and checks out what these practices really are.  
14 If they are actually regenerative, and we have that standard in  
15 place, that's great. But there are a lot of things about  
16 organic that really, really matter.

17 CHAIR POWELL-PALM: Thank you. Thank you again. I  
18 would just throw -- if you could follow up possibly with the  
19 social groups that you think organic should be aligning with  
20 most closely to move the needle on this social production  
21 component. Obviously, is not built into our standards but I  
22 would be curious as to what alignments and what coalitions we  
23 can build with other groups that you think would be most  
24 effective towards moving the needle in the direction you see as  
25 the future of organic. Thank you.

1 MR. LEWIS: Happy to do that. Thank you.

2 CHAIR POWELL-PALM: All right. Next up -- oh, and  
3 thank you for that invocation. That was just a lovely way to  
4 start the day.

5 Next up, we have Mark Kastel, followed by Elizabeth  
6 Bell, and then John Foster.

7 Mark, please go ahead.

8 MR. KASTEL: Thank you, Mr. Chair.

9 My name is Mark Kastel. I'm the executive director  
10 of OrganicEye. We are best known as an organic industry  
11 watchdog. And I think to summarize Alan Lewis' talk, I'd say  
12 what are we doing in this basket and where are we going? The  
13 cash registers are ringing, though we might be on the road to  
14 hell.

15 We built this movement, which has morphed into an  
16 industry around better food, a connection between -- loving  
17 connection between consumers and farmers, environmental  
18 stewardship, and economic justice for farmers. It's time for  
19 the NOSB to take back the regulatory reins from this betrayal  
20 that we're experiencing. We're seeing large scale fraud.  
21 We're seeing markets flooded with imports, livestock factories,  
22 CAFOs, squeezing out family scale farmers. We're losing family  
23 farmers. We're losing organic farmers and replacing them with  
24 industrial investor-owned operations. Loss of confidence that  
25 Alan talked about. Competing labels. These are really bad

1 signs of bad times for the true working definition of organics,  
2 which has been eroded.

3           Soon, you'll hear a few speakers from now from one of  
4 the OrganicEye farmers -- farmer members, Bruce Kaser, on a  
5 lawsuit that was filed today challenging uninspected illegal  
6 imports that have the USDA blessing and label on them. We've  
7 had damaged markets from this. We basically have U.S.  
8 commodities, which we're able to compete, we're -- we're able  
9 to produce in this country, we're not talking strictly bananas  
10 or chocolate, and our farmers can't compete. They can't  
11 survive in the marketplace.

12           CAFOs with 10 or 20 cows, effectively stocking  
13 levels, in the desert when the last time we -- we interviewed  
14 or polled family farmers the average was one cow per acre;  
15 that's a bad joke.

16           We have hogs, chickens; none of them are outdoors.  
17 The current rules require their ability to exhibit their  
18 natural instinctive behaviors. The current law -- forget about  
19 this new rule making a measly two-square feet for chicken. The  
20 current laws are being violated.

21           Carcinogens in organic food, yes. Illegally there.  
22 If you want to know which ones, you can ask me a question.  
23 This is really undercutting consumer confidence.

24           And Material Review Organizations, with no legal  
25 oversight by the USDA; some portraying themselves as being

1 nonprofit, multimillion-dollar organizations that get \$1,000 or  
2 less per year of contributions, where the vast preponderance of  
3 funding comes from the corporate -- corporate entities they  
4 serve. So, we ask you to step back up, look at the policy and  
5 procedure manual, take back the ability to control your own  
6 agenda, and work plan. Thank you very much.

7 CHAIR POWELL-PALM: Thank you, Mark.

8 Logan, please go ahead.

9 BD. MEM. PETREY: Hey, thank you, Mark. Yeah, so I  
10 got a question about the imports. Possibly a lot of them come  
11 across the border, so in the southeast here we actually do  
12 compete with that production window a lot.

13 Curious about when you're saying they can undercut  
14 the farmer, because that happens a lot, we -- we see that a lot  
15 in labor costs because labor costs are so cheap in other  
16 countries, and organics can be such a high-labor input when it  
17 comes to veg, especially like weeding and hand-harvesting,  
18 things like that. Do you think it is tailored towards, you  
19 know, the -- the labor side? Or maybe the -- the fraudulent  
20 side, that they're actually using conventional product, you  
21 know, selling it organic? What -- what area were -- were you  
22 trying to imply in that, if that is one of the implications?

23 MR. KASTEL: I would say the answer to that is yes,  
24 in -- in both regards and more.

25 So, we've got crops -- certain commodity crops like

1 soybeans where the vast majority of what organic livestock in  
2 this country consume are produced offshore. We've had  
3 tremendous fraud, but we're the largest producer in the world  
4 of many of these crops. We're highly mechanized, very  
5 efficient, there's no reason we can't compete, excepting the  
6 structure is stacked against us.

7 A number of years ago, when Dean Foods owned a  
8 leading soymilk manufacturer, they claimed there was a  
9 shortage. that's why they went to China for soybeans. At the  
10 same time, U.S. organic farmer cooperatives testified that they  
11 were dumped by Dean Foods for price. So, labor's a factor.  
12 Monetary exchange and fraud is a factor.

13 And what Bruce Kaser will be talking about is group  
14 certification, which started out as a good idea with indigenous  
15 communities and cooperatives supervising, helping supervise  
16 their own small landholders. But it's (audio distortion)  
17 morphed a different system, so now we have corporate  
18 agribusinesses supervising their own suppliers as the quote  
19 "group," and so we basically have uninspected products coming  
20 into the country, some of which we can produce ourselves here.  
21 Some of us, we can't, and we need to, as organic consumers,  
22 depend on the integrity of that process. And I'll let Bruce  
23 speak more to that point.

24 CHAIR POWELL-PALM: Amy, please go ahead.

25 SECRETARY BRUCH: Sure. Thanks, Nate.

1           Thanks, Mark. And thanks for extending invites to  
2 farmers to participate also in this process. We're looking  
3 forward to hearing from Bruce later on today or tomorrow -- or  
4 on Thursday when he's on the schedule.

5           I wanted to, kind of, I guess in conjunction with  
6 Logan's question, fraud -- and dealing with fraud is really  
7 important to our board and the integrity of our seal. You had  
8 had a written comment in response to our residue testing and a  
9 global supply chain. It was just -- you mentioned that you had  
10 in the past created a petition for rulemaking in regards to  
11 this topic. I was just wondering if -- if you'd be willing to  
12 send that our way? I wasn't able to find it when I just did a  
13 quick Google search, it might be on the Internet, but if you  
14 could just send that to us for a review? I think, you know, we  
15 have that as a topic -- as a discussion document, so any  
16 supporting information that's been generated would be helpful  
17 to -- to review. Thank you.

18           MR. KASTEL: Well, I'd be happy to. And let me just,  
19 in two sentences, summarize. Some of these legal petitions --  
20 this is the lack of control you folks have of your agenda and  
21 work -- they go to the NOP and then they go into a black hole.

22           So, one shipment of soy or corn from offshore bulk  
23 freighter, according to some of our members who run these  
24 organic cooperatives in the U.S., one shipment equals the  
25 annual production of 40 or 50 average size U.S. grain farms.

1 The cost to test every single shipment is inconsequential  
2 compared to the dollars that that is worth. So, if you compare  
3 the cost to certify 40 or 50 U.S. farms to the testing of these  
4 imports, we could be nipping this in the bud.

5 The other petition that we offered was an alternative  
6 view of certification. Instead of inspecting every year honest  
7 farmers like Bruce, who you're going to hear just in a few  
8 minutes, by sometimes people fresh out of school that have gone  
9 through a minimal training and hired by a certify [sic] or  
10 sometimes a contractor, instead of doing that, taking a look at  
11 comparative risk and auditing the best farmers once every five  
12 years, but with people who have an experience in production  
13 agriculture forensic accounting, because the paperwork is just  
14 as important or more important than viewing the fields, et  
15 cetera. And -- and then taking the savings that we have from  
16 not doing this busy work every single year, and this would take  
17 legislative intervention to -- to facilitate, but taking that  
18 savings and really ramping up the random testing and the  
19 unannounced inspections, and -- because right now, most  
20 inspections, whether you have 20,000 cows on a dairy or you're  
21 Mom and Pop family farm, they have them my appointment, and so  
22 everybody knows when to expect the inspector. And -- and that  
23 inspector many times going toe-to-toe with the professional  
24 agriculturalist that if they really want to figure out how to  
25 do creative writing with the paperwork or show them the right

1 scenes, it's all too easy to deceive people with lower levels  
2 of experience.

3 So, I thank you for the question, and I will make  
4 sure the -- that we send that material to -- for distribution  
5 to the NOSB.

6 SECRETARY BRUCH: Thank you, Mark.

7 CHAIR POWELL-PALM: Keep things moving along, Kim,  
8 please go ahead.

9 BD. MEM. HUSEMAN: Sure. I'll be quick here.

10 Thank you, Mark, for all of your comments. You  
11 mentioned organic pork production. In just a very quick way,  
12 can you give us what you think would help to promote the  
13 organic pork industry here in the U.S.?

14 MR. KASTEL: Well, one is obviously the integrity of  
15 the label, and I'm going to -- I'm going to throw pork and --  
16 and poultry in both broilers and -- and layers because I've  
17 visited probably more of these industrial scale operations than  
18 probably anyone.

19 BD. MEM. HUSEMAN: Okay, yeah, I was just asking  
20 about pork. If we could just kind of look at that operation  
21 from a growth perspective, as it is probably the most limited  
22 in the -- the livestock industry.

23 MR. KASTEL: Sure. It --

24 BD. MEM. HUSEMAN: Yeah, what would be your thoughts  
25 on that?



1           MR. KASTEL: Besides sausage, I don't see a lot of  
2 pork out there. And but there's an old axiom in marketing, and  
3 that's, you know, it's got to be different or better. And --  
4 and if you can't differentiate your product, you're going to  
5 have a problem, and so we've applied the industrial model to  
6 organic livestock production.

7           Quite frankly, if you go out to somebody who truly  
8 raises pastured pork, whether it's certified organic or not, --  
9 and I don't eat non-organic livestock because the majority of  
10 what they consume is not grass, unless it's 100 percent grass  
11 finished beef or the rare 100 percent grass dairy -- it's  
12 great. And so, if it's not -- they could say pastured pork but  
13 if it's not certified organic it really isn't. So, but if --  
14 depending on the breeds of the hog, and the production model,  
15 there is a tremendous difference in the flavor, the taste, the  
16 quality, the nutrition in that product. And so, if we can't  
17 markedly distinguish organic, whether it's the root vegetables  
18 that taste like cardboard that were produced year round and  
19 California or Mexico, or that were produced by Elliot Coleman,  
20 who isn't certified, in Maine where his carrots and the ones I  
21 get from Harmony Valley here in Burning County, Western  
22 Wisconsin, whose certified organic, tastes like candy,  
23 especially after the first frost they just get better; if we  
24 can't differentiate our product and we charge more for it then  
25 we really are back to that input dynamic that Alan was talking

1 about that organics just is what we avoid rather than coming up  
2 with a ecologically-based humane-based system that produces a  
3 better quality food that people can taste. And pork is where  
4 you can really, really taste the difference in both the breed  
5 selection and the outdoors and the diverse diet that they  
6 consume.

7 BD. MEM. HUSEMAN: Thank you, Mark.

8 CHAIR POWELL-PALM: Thank you, Mark.

9 Next up, we have Elizabeth Bell, followed by John  
10 Foster, and then Mike Crotser.

11 Elizabeth, the floor is yours.

12 MS. BELL: Thank you, Nate. Can everyone hear me  
13 okay?

14 CHAIR POWELL-PALM: Um-hum.

15 MS. BELL: Great. Good morning or afternoon. I'm  
16 Liz Bell, and I'm here today representing CROPP  
17 Cooperative/Organic Valley. Thank you to the NOP and the board  
18 for giving me this opportunity today to provide comments on  
19 behalf of our co-option.

20 I previously worked in organic certification and now  
21 in my role at OV, I work to consult our 1600 farmers and bridge  
22 the gaps between them and the 30 different certifiers we work  
23 with. I'd like to use this time today to highlight our  
24 comments on two CACS agenda items.

25 First off, CROPP Co-Op appreciates the proposal on

1 consistent location identification and the intent in helping to  
2 deter fraud. A couple concerns we want to address include who  
3 will be responsible for providing this geolocation information  
4 and how this sensitive data will be stored.

5           If farmers are obligated to provide these coordinates  
6 it could pose barriers for the plain community, which consists  
7 of over half our membership. We support certifiers or  
8 inspectors collecting such information themselves.

9 Additionally, we are cautious of the privacy of this location  
10 data since it is often confidential, and farmers do not want to  
11 share it publicly.

12           We support certifiers maintaining this information in  
13 the same manner as other confidential certification files. We  
14 support the use of geolocation information for certifiers to  
15 consider as a voluntary option, but not a mandatory  
16 requirement. In the case this proposal passes and moves  
17 forward in the regulatory process, we'd like to see further  
18 guidance by the NOP for certifiers regarding best practices in  
19 establishing collection methods, format, and privacy of this  
20 information.

21           Regarding the discussion document on improving  
22 support for organic transition, we urge the board to  
23 communicate a ringing endorsement of the efforts of the  
24 greatest federal investment in organics history. CROPP Co-Op  
25 would like to see more development of direction on organic

1 transition from a consumer demand perspective. We believe that  
2 OMDG is the highest priority of the Organic Transition  
3 Initiative.

4           Organic Valley is a marketing co-op. Our marketing  
5 department works closely with our customers and consumers for  
6 feedback, which in turn helps to make decisions for our  
7 business and down the supply chain for our farmers. We  
8 recognize that farmers need guidance driven by market demand,  
9 whether they're transitioning or already certified. The  
10 organic industry cannot be successful in this initiative  
11 without knowing what the marketplace demands and educating the  
12 public as to what organic really is. Demand side growth  
13 develops farmer focused opportunities.

14           We at -- we at CROPP Cooperative offer to have more  
15 of a seat at the OTI table to provide our insights on this. We  
16 encourage the OSG to focus on marketplace demand and consumer  
17 education in order to successfully foster the growth of the  
18 organic industry.

19           For over 30 years we've assisted thousands of farmers  
20 with their transition to organic. Buying organic feed at  
21 extremely inflated prices and not getting paid organic premium  
22 for at least a year can deter any farmer from making the  
23 decision to go organic at all. As a way to lessen this burden,  
24 Organic Valley offers a 12-month transition incentive premium  
25 to dairy farmers that are in their last year of transition.

1 Our mission is to save as -- save as many small family farmers  
2 as possible.

3 Thank you again for allowing me this opportunity to  
4 speak today. I especially look forward to providing comments  
5 in person in Milwaukee in April. I'm happy to answer any  
6 questions now. Thank you,

7 CHAIR POWELL-PALM: Thank you, Liz. Amy has a  
8 question for you.

9 SECRETARY BRUCH: Liz, hey, thanks for your time  
10 today. Thanks for all the written comments, too. I appreciate  
11 them and -- and reviewed them. I did have a question about  
12 your written comments, and this was on the residue testing in a  
13 global supply chain.

14 There was just a comment in there that said there --  
15 that your organization would have concerns if there would be an  
16 increase the testing across the global supply chain, and I just  
17 wanted you to unpackage that for me because, you know, we've  
18 heard through the written comments, not yet on the oral, you  
19 know, people were really pushing for increased number of  
20 testing through our imports, and then I saw your comment. I  
21 just wanted to understand that a little better.

22 MS. BELL: Yeah, Amy, thanks for your question. In  
23 two slots, Mike Crotser will be talking specifically on residue  
24 testing, so I'm gonna push this along to him, if that's okay  
25 for you to ask that to him? He's the -- he's the pro on that.

1           SECRETARY BRUCH: Okay, no problem. That sounds  
2 good. I saw he was going to talk about handling, so I saved it  
3 for you.

4           MS. BELL: Yeah.

5           SECRETARY BRUCH: Yeah.

6           MS. BELL: oh, yeah.

7           SECRETARY BRUCH: I'll -- he'll know it's coming  
8 then. Okay, thank you.

9           CHAIR POWELL-PALM: Allison, please go ahead.

10          BD. MEM. JOHNSON: Thanks so much, Elizabeth. We  
11 really appreciate everything Organic Valley has been doing on  
12 organic transition and -- and helping keep our organic dairy  
13 sector up and rolling.

14           I wonder if you could say a little bit more about two  
15 things. You mentioned operating from a consumer demand  
16 perspective, and I'm curious if you could speak to specific  
17 products or, you know, product areas where you think there is a  
18 lot of consumer demand that isn't yet being addressed  
19 adequately through the Organic Transition Initiative?

20           And then I'm Excited to hear about the -- the 12-  
21 month kind of transition funding that you provide, and I'm  
22 curious if you have thoughts on how that could be kind of  
23 institutionalized or what our USDA and government could be  
24 doing to make that available to producers beyond Organic Valley  
25 suppliers?

1 MS. BELL: Um-hum, yeah. Thanks, Allison. In terms  
2 of specifics on demand, I would need to sit down with our  
3 group. We can certainly follow up with -- with you all and  
4 touch base a little more so with our marketing group.

5 I think it's -- I mean, we are part of the -- the  
6 puzzle so to speak. I think -- I mean, I think we have this --  
7 a perspective, but I think other industry members have great  
8 perspectives, as well, so kind of I envision almost like a -- a  
9 round table of industry, kind of discussing those sorts of  
10 things and putting together all of their marketing groups for  
11 something like that. So, I can't really speak on super  
12 specific things right now, but I think kind of getting the --  
13 maybe a ball rolling on -- on those discussions would be  
14 something we would love to see and love to have a seat at the  
15 table on.

16 And then in terms of implementing a 12-month  
17 incentive kind of institutionalized, I would love to see that.  
18 Yeah. I don't know the systems in which to implement that on a  
19 large scale, but we could certainly be in discussions on how we  
20 do it and offer to provide any sort of insights on that, if  
21 that is something that would be developed, um-hmm. Yeah.

22 BD. MEM. JOHNSON: Thanks, I really appreciate it.

23 MS. BELL: Thanks, Allison.

24 CHAIR POWELL-PALM: I have two quick questions for  
25 you, Elizabeth.

1 MS. BELL: Two quick questions, okay.

2 CHAIR POWELL-PALM: Very quick. So, the first one  
3 is, if I heard you right you like the geolocation doc, but want  
4 to make sure that the caveats are held?

5 MS. BELL: Yeah. Just a couple --

6 CHAIR POWELL-PALM: Okay.

7 MS. BELL: -- concerns. Want to -- want to make sure  
8 that those are clear, and that the NOP can provide some -- some  
9 sort of best practice guidance's on -- on that for certifiers.  
10 You know consistency is good.

11 CHAIR POWELL-PALM: Definitely. I -- we -- we know  
12 each other outside of just public comments, and I know you were  
13 an inspector who dealt with geolocation.

14 How hard of a burden was it on you as an inspector,  
15 do you think, locking in these KMZ files?

16 MS. BELL: Um-hum. Um-hum. Not -- it was -- it was  
17 challenging to some -- to some aspect. But I -- I would say  
18 the benefit very much outweighed the -- the challenge or the  
19 cumbersome aspect of it.

20 So, Nate is referring to when I was inspecting and  
21 drawing up Google Earth KMZ files for every -- every field, and  
22 that was a great practice, I think for -- for us and -- and,  
23 you know, each certifier I worked for, and making sure that we  
24 were capturing exact boundaries every year and verifying that  
25 this is part of the OSV. So great confidential information to



1 be had as part of the OSV.

2 CHAIR POWELL-PALM: Absolutely. And the last one is,  
3 you mentioned Organic Marketing Development Grant. I know  
4 that, or I believe I saw that the -- that Organic Valley  
5 announced the Organic Marketing Act, and I was just wondering  
6 how much support from other groups have you gotten for this  
7 work, and kind of for the celebration of value-added on farms?  
8 Bringing more value to farms through processing capacity?

9 MS. BELL: Mmm, that's a good question for Adam.

10 CHAIR POWELL-PALM: Okay.

11 MS. BELL: He's the --

12 CHAIR POWELL-PALM: That's good. I'll follow-up.

13 MS. BELL: He's the know-it-all. I'm sorry, I'm just  
14 pushing questions everywhere, but no, he's -- he's really been  
15 the master of this, so I'll -- I'll make a note for -- for him  
16 to follow-up with you, Nate.

17 CHAIR POWELL-PALM: All right, I really appreciate  
18 your comments today. Thank you.

19 MS. BELL: Yeah, thank you.

20 CHAIR POWELL-PALM: Next up, we have John Foster,  
21 followed by Mike Crotser and then Bruce Kaser.

22 MR. FOSTER: Well, good morning, everybody. Thank --  
23 thank you for your time. As usual, I look forward to seeing  
24 you all next week, as well.

25 My name is John Foster. I am with Wolfe &

1 Associates. We're a consulting firm that specializes in  
2 organic; pretty much everything in the organic space. And I'm  
3 going to bring back a -- what's becoming a well-worn comment  
4 for you, with some new information though.

5 Next slide, please.

6 So, as usual, you'll recognize, you know, say it with  
7 me, you'll know -- you'll recognize these general comments  
8 here, "We believe in, directionally National List should be  
9 something that's inclusive, supportive, and accommodating for  
10 as many organic producers globally, as possible." I won't  
11 spend a lot of time on it today, but I still believe that a --  
12 a unified commercial availability registry is really a good  
13 direction to move in. Even if it takes 10 years to get there,  
14 I'm going to keep harping on it every chance I get until then.

15 But I'd like to focus most of my time on something I  
16 feel is very hopeful, actually is -- and that is application of  
17 commercial availability clauses in 605, Handling Materials.

18 Next slide, please.

19 So, there are many precedents here, building on  
20 flavors, yeast, collagen gel, and there are a couple others on  
21 605. The hope would be that this provides additional  
22 regulatory incentives to drive R&D, and but already R&D has  
23 provided very novel production methods and brought them to use  
24 in developing organic ingredients. Many of them flavors.

25 Another advantage is that this LOCA, lack of

1 commercial availability, documentation is very familiar to ACS  
2 and handlers, so we're not doing a whole lot of new training on  
3 process here if -- if this were to go in effect.

4 And most important to -- to me, and this is a big  
5 push for Bill, as well, is increase for demand of organic  
6 ingredients creates increased opportunity for organic crops,  
7 and that encourages, Nate, one of your favorite things getting  
8 more ground in organic production.

9 Next slide, please.

10 CHAIR POWELL-PALM: Sure.

11 MR. FOSTER: So, some recent examples here, and this  
12 is pretty --this is fairly -- fairly new, as of like than a  
13 month ago, commercial availability. Annotation is not new on  
14 flavors, that's been on 605 for a while, but what the last few  
15 years have shown very clearly is that this drove significant  
16 innovation in organic flavor development over the last several  
17 years.

18 What is recent is -- is two materials that sound  
19 horrible, okay, but you're -- if you're drinking red wine or  
20 you're eating cherry pie, my personal favorite, you are eating  
21 these things right now, right. Ethyl acetate and benzaldehyde.  
22 There's now sources of -- certified organic sources of each of  
23 these, and that was driven exclusively by the commercial  
24 availability clause for flavors, right. That's -- there's  
25 hard, hard evidence for that, hard data for that. What's

1 particularly interesting is that, to me, is that ethyl acetate  
2 is not only a flavor you'd recognize this in like red wine  
3 flavor, most of those flavor keys you're tasting there are  
4 ethyl acetate, but it's also an excellent extractant that  
5 behaves very differently than ethyl ethanol but can serve to  
6 generate ever more extracts. I think that -- I think the  
7 ingredient opportunities that arise from that could be very  
8 positive.

9           Next slide, please.

10           I've -- I sent a list following last spring's  
11 meeting. I sent a longer list, but a few possibilities in  
12 organic innovation are in these materials that are on 605, both  
13 (a) and (b), and as the ability of our -- as our technology and  
14 food science advances, there are increasingly opportunities to  
15 develop new ingredients in organic forms. And we are looking  
16 for stakeholders for competitions in that direction.

17           That's all I have I think. Next slide's, I think,  
18 just gravy. Yep. Thank you.

19           CHAIR POWELL-PALM: All right. Amy has a question  
20 for you.

21           SECRETARY BRUCH: Yeah, thanks, Nate.

22           Thanks, John. Appreciate your time. And thanks for  
23 the inclusion of the -- of the list that you had in the written  
24 comments, kind of a follow-up from our spring meeting.  
25 Definitely want to grow these organic markets like you alluded

1 to.

2 I see in your written comments you mentioned you did  
3 have a goal to generate a petition for the NOSB on this topic,  
4 and love attach timelines of goals so we can make them real,  
5 because I think this one would be a good opportunity here.

6 Do you have kind of an idea on a timeline  
7 potentially?

8 MR. FOSTER: Yeah. Well, yeah, there's a -- some  
9 low -- I -- I consider low-hanging fruit would be citric acid.

10 Now, truth be told, I'd rather see a blanket  
11 commercial availability; just lay over the whole of 605, right.  
12 I under -- that's not our precedent though, right, it's  
13 itemized now. So, assuming that a blanket commercial  
14 availability clause just isn't in the cards for some reason, I  
15 don't know how you would create all the documentation required  
16 to hit every item on 605, like in terms of alternatives and all  
17 of that, so I think it's going to have to be individual.

18 So low hanging fruit would be citric acid, which I --  
19 is already on the market as certified organic. Not easy to  
20 find, and it's not produced except to order. And that's --  
21 that's the rub there, is that they won't produce it unless it's  
22 ordered, but until there's a drive to get it ordered there's no  
23 incentive to produce it, so people don't know it's out there.

24 Back to your question, it -- this is something that  
25 could be in your hands to review, well, I'd love to say by the

1 spring meeting, but certainly by the fall. We have a Lot of  
2 other things going on in the next six months, but I -- there's  
3 no doubt in my mind it could be in your hands for discussion at  
4 the fall meeting in Portland.

5 SECRETARY BRUCH: Excellent.

6 MR. FOSTER: I would love to see that. And whether  
7 it's citric acid or something else, I think there's a number of  
8 other opportunities, that's just the one that comes to mind --

9 SECRETARY BRUCH: Um-hum.

10 MR. FOSTER: -- that we've helped find so that people  
11 could hit that -- that 95 percent mark on a challenging  
12 formulation.

13 SECRETARY BRUCH: Um-hum.

14 MR. FOSTER: But, yeah, would -- would you -- can I  
15 ask; would you -- would You like to see that in the fall?

16 SECRETARY BRUCH: Well, anything that can help, you  
17 know, drive innovation, and expand our markets, I --

18 MR. FOSTER: Cool.

19 SECRETARY BRUCH: -- think that that we're in favor  
20 of things like that. So --

21 MR. FOSTER: Love it. Okay. Duly note.

22 SECRETARY BRUCH: Okay, thank you.

23 MR. FOSTER: Duly noted. Thank you.

24 CHAIR POWELL-PALM: Nate Lewis, please go ahead.

25 Then Logan.

1           BD. MEM. LEWIS: Thanks, John. Citric acid happens  
2 to be the -- my Sunset for next year, so duly noted about  
3 potential annotation there.

4           And I -- I guess my question, just to sort of push  
5 this concept a little bit, it sort of makes sense to me why  
6 commercial availability is not included on 605 since either the  
7 non-agricultural products and organics designed for  
8 agricultural products and so these are kind of like anomalies  
9 that happen to meet composition and, you know, the processing  
10 requirements of organic. So, I guess what I'm trying to kind  
11 of get to the bottom of is, absent a 605 blanket commercial  
12 availability clause, what kind of structure can we put in place  
13 so that at Sunset a specific annotation can sort of  
14 automatically be considered and we cannot -- I mean I love  
15 hearing from you, but I would love for the board to just always  
16 assume that it's on the table every time we review a material  
17 going forward, so I'm just sort of trying to think about  
18 building in some mechanisms for the Sunset Review so that we  
19 can achieve the goal.

20           MR. FOSTER: Mmm. So, I will avoid trying to get  
21 into my "Story Time with Uncle John" mode, but -- but there  
22 were, back on my term on the board, I believe it was the -- it  
23 was the time in which annotations being added during Sunset  
24 became verboten for really good reason. Times were different.  
25 Meetings, you know, meetings went much longer, decisions were

1 made sometimes at 1:00 or 2:00 in the morning, but -- but it --  
2 but the takeaway, I think it was biodegradable mulch, actually  
3 it might have lit the fuse to the end of this. But I don't  
4 think it's prudent to build in annotations as a part of Sunset  
5 Review, if -- because of that train -- those many train wrecks  
6 that happened up until whatever it was, 2012 or 2013. 2014  
7 maybe.

8           However, I do feel like if the board would signal  
9 that it was open to a very straightforward petition to review  
10 those thing -- that recognizing their petition to add this  
11 clause doesn't necessarily require a full technical review, for  
12 example, or an updated TR, or -- yeah, TR now. That would be  
13 helpful because then it would -- that would make it easier for  
14 someone to say, well, actually there's a lot known about citric  
15 acid. It' s used everywhere. There's really no concerns, at  
16 least right now, no concerns about its use or how it's used.  
17 Maybe we could make it easier. Follow the petition process,  
18 because that is the process and we should follow it, but the  
19 depth of information that would be required to review that, to  
20 that -- to add a commercial availability clause, if -- if there  
21 could be a signal that said there well open to that, it may  
22 make it more encouraging for an operation who makes very little  
23 of a material, but could make more, it would -- could be  
24 encouraging for those folks.

25           And the company like ours, we've got very, very --



1 we're very used to heavy lifting in petitions, and that would  
2 be something we could do much more -- we could facilitate that  
3 much more readily if we -- if we had a sense that they were --  
4 it was a welcome, open invitation to do so. And that's what  
5 I'm getting actually, from this moment, is that it -- perhaps  
6 it's more welcome than we thought it was. So -- so we -- we  
7 could certainly telegraph that to participants or manufacturers  
8 and -- and actually as a function of this question, Nate, I'm  
9 going to do that between now and spring.

10 So, does that answer your question? Sorry. Okay,  
11 cool.

12 CHAIR POWELL-PALM: Logan has a question for you.

13 BD. MEM. PETREY: Yeah, just a quick question.

14 There's two --because I have flavors and it -- it's good to  
15 hear that there are some that are increasing. The two that  
16 you're talking about, I don't even know where they -- where do  
17 they come from? What -- what are they? You said that organic  
18 production has increased.

19 Do you know? I -- I don't know.

20 MR. FOSTER: I'm not privy to the --

21 BD. MEM. PETREY: Yeah, sure.

22 MR. FOSTER: -- to the source materials, but --

23 BD. MEM. PETREY: Okay.

24 MR. FOSTER: -- I know that they were recently  
25 recertified, I believe, four weeks ago. They're on --

1 BD. MEM. PETREY: Okay.

2 MR. FOSTER: -- in the -- and they were immediately  
3 funneled to the OID.

4 BD. MEM. PETREY: Okay.

5 MR. FOSTER: And what's also interesting in  
6 communication I had at Expo East was from -- with the  
7 manufacturer, was that within three days of that posting on  
8 OID, they had inquiries from much larger flavor houses saying  
9 like, are you sure you've got organic ethyl acetate? Like how?  
10 Really? And it -- it took Literally 72 hours for the flavor  
11 community to recognize that and say, wow, like now this is here  
12 we need to use it.

13 BD. MEM. PETREY: Okay.

14 MR. FOSTER: That -- that's the -- the speed that  
15 these things can happen, is -- that astonished me. And it  
16 astonished the manufacturer because that manufacturer was  
17 unaware that global flavor houses monitor the OID so carefully.  
18 And clearly they do because there was zero advertising of this  
19 in the first 72 hours.

20 BD. MEM. PETREY: Okay. Great. Thank you, John.

21 MR. FOSTER: So, yeah. I -- it was wonderful.

22 Actually, that also did -- it spoke very high, in my  
23 mind, it says a lot of positive things about the -- the role of  
24 OID in the marketplace and the power of it and I think we ought  
25 to harness -- harness the heck out of the -- the role of OID in

1 the marketplace, and the power of it. And I think we ought to  
2 harness -- harness the -- the heck out of that.

3 CHAIR POWELL-PALM: Absolutely. Thank you, John.  
4 Appreciate --

5 MR. FOSTER: You bet.

6 CHAIR POWELL-PALM: -- your comments. And we'll see  
7 you next week.

8 MR. FOSTER: That you will. Thank you.

9 CHAIR POWELL-PALM: Next up, we have Mike Crotser,  
10 followed by Bruce Kaser, and then Terry Shistar.

11 Mike, the floor is yours.

12 MR. CROTSEY: Oh, hey everyone, can you hear me?

13 CHAIR POWELL-PALM: We can. Please go ahead.

14 MR. CROTSEY: Oh, thanks, Nate.

15 I'm Mike Crotser, the certification director at CROPP  
16 Cooperative. We appreciate the work of the NOSB and the NOP to  
17 support organic agriculture. Thank you for the opportunity to  
18 speak.

19 It's fall and harvest season is here for farmers.  
20 Before I get started I want to express my gratitude to all the  
21 members of the organic community, and especially thank the  
22 farmers for their work. My comments today will focus on the  
23 discussion document, oversight to deter fraud, residue testing  
24 in a global supply chain. The premises of this document was  
25 not to replace the sound organic system plan with metric based

1 testing, this is good to know, but it's important to  
2 acknowledge that expanding testing will, at least, be a small  
3 shift from evaluating outcome-based production systems towards  
4 a metric driven process. In principle we support expanded  
5 testing; being said, the discussion document prompted several  
6 questions that should be addressed prior to proceeding.  
7 Targeting fumigants makes sense, especially because of  
8 fraudulent grain in our supply. We are less familiar with  
9 fraudulent use of hexane as an extractant.

10 Do we have evidence that fumigants and hexane are  
11 problematic and present in organic crops? The threshold for  
12 hexane and how NOP 2613 relates to this threshold must be  
13 carefully thought out.

14 Can results that exceed the threshold effectively  
15 differentiate between incidental, unintentional contamination  
16 when compared to adulteration? From our experience, resolving  
17 positive pesticide tests for compounds on NOP 2611-1 is  
18 difficult. Often, operators cannot convey how the pesticide  
19 contaminated their crops leaving certifiers with no resolution.

20 Since the finalization of the Organic Periodic  
21 Residue Testing rule, where are we years later? Has this  
22 effort reduced fraud and improved integrity? Would a technical  
23 report that outlines the benefits and shortcomings of residue  
24 testing assist in the expansion of this program? Are  
25 additional tools needed for certifiers to be successful? For

1 example, with a classification tool that compared chemical  
2 common pesticide name with trade name or pesticidal class  
3 improve outcomes? Are there commonly used pesticides that  
4 should be tested but are not due to the limitations of the  
5 multi residue screen testing?

6 I hope that our questions do not express that we  
7 don't support expanded testing for residue. We acknowledge the  
8 board seeks continued improvement and we support this goal.  
9 Our point is to convey the complexity of residue testing and  
10 encourage the organic industry to thoroughly think this out  
11 before implementing.

12 I want to thank the NOSB, the NOP, and the organic  
13 industry for time to speak today. And I'm happy to address any  
14 questions from the board. Thank you.

15 CHAIR POWELL-PALM: Thank you for your comments. Amy  
16 has a question for you.

17 SECRETARY BRUCH: Yeah. Mike, thanks for  
18 participating in the process today. I appreciate the written  
19 comments you guys provided, also. And the questions you threw  
20 back at us. That's the beauty of these discussion documents;  
21 we love the community to mow them over and -- and, you know,  
22 let us know what -- what are some concerns about the written  
23 material that we provided, so thank you.

24 I asked Elizabeth prior, and she deferred this  
25 question to you, just about your written comments that stated

1 in general you'd have concerns if -- if this testing would  
2 increase -- increase global supply chain testing, I think, as a  
3 whole, especially imports. It seemed like from -- from the  
4 written comments from your organization, there was concerns  
5 there versus some other folks through their written comments,  
6 they were really in support of expansion of testing, so I was  
7 just trying to unpackage the concerns a little bit more.

8 MR. CROTSEY: I -- I think on -- on two pieces of  
9 that of that is I allow -- my concerns were mostly addressed  
10 today, but specifically for inputs, sourcing ingredients can be  
11 a challenge and so this is maybe part of a bigger picture of  
12 having available ingredients that we need for production. And  
13 a good example of that, that is not related necessarily to  
14 residue testing, is organic sunflower lecithin, right. We use  
15 that and have used that to agglomerate whey protein  
16 concentrate. And then the war in Ukraine broke out, right,  
17 and -- and most of that comes from sunflower production in  
18 Ukraine, so that is just a risk that we look at generally  
19 across the business, and so how would testing play a role in  
20 availability of the materials is a concern.

21 I don't want to imply to the NOSB that we are at all  
22 opposed to testing, but that could be an additional wrinkle  
23 that -- that -- that could affect availability of some of the  
24 ingredients that we're looking for in our supply chain.

25 SECRETARY BRUCH: Um-hum. Um-hum. Okay, thank you,

1 Mike. Appreciate that.

2 CHAIR POWELL-PALM: Nate. Nate Lewis, please go  
3 ahead.

4 BD. MEM. LEWIS: Yeah, this might end up being more  
5 of a comment, but just want to echo appreciation for your  
6 questions on the testing document and leading this up with Amy,  
7 so any input is great.

8 And also want to acknowledge that I share the -- your  
9 view that, you know, organic is a process based standard and  
10 I'm certainly looking at testing as a effective verification  
11 and validation tool for certifiers to -- to verify and validate  
12 that process. So, I'm just sort of -- a call out; keep us in  
13 a -- keep us in that lane. So, if you see us drifting and the  
14 proposal getting to a point where it appears to be more of a  
15 metric in an outcome-based standard, give us -- give us a  
16 gentle nudge and get us back in our lane. So, thank you.

17 MR. CROTSEY: Yeah. Thanks, Nate. And I -- and  
18 that's why I kind of backed up like where are we today with  
19 residue testing. I -- I led that program within my previous  
20 certifier role, and -- and it's clunky. It's very clunky.  
21 Certifiers don't understand pesticides, they're not familiar  
22 with compounds on 2611, and then the challenges of when you get  
23 a positive test what the heck do you do? You know, how do you  
24 get this resolved? It's -- there's some challenges in there.  
25 And it's more so before you bite it off another chunk of

1 residue testing, I think it would be good to reflect where we  
2 are today with that program.

3 CHAIR POWELL-PALM: I just want to thank you, Mike,  
4 for how seriously you take giving us really helpful comments  
5 that address exactly what we're working on, so thank you for  
6 the time and the homework it takes to make those -- make those.

7 Any other questions for Mike?

8 (No response.)

9 CHAIR POWELL-PALM: All right, we appreciate your  
10 comments today.

11 MR. CROTSEY: Thank you. And we'll see you next  
12 week.

13 CHAIR POWELL-PALM: Next week.

14 Next up we have Bruce Kaser, followed by Terry  
15 Shistar, and then Sydney Arnone.

16 Bruce, the floor is yours. Please state your name  
17 and affiliation.

18 MR. KASER: Thank you. I'm Bruce Kaser. I'm affiliated  
19 with Pratum Farm, LLC. I'm an old lawyer who turned into an  
20 organic hazelnut farmer, and as a matter of fact we're in the  
21 middle of harvesting out here. We're in -- when I'm done here,  
22 I got to go out and get my harvester greased up and ready to  
23 go.

24 I'm here today to explain why we are filing a federal  
25 court action that asks a judge to declare grower group



1 certifications illegal.

2           The -- you know, the public's perception is that  
3 certified organic farmers are the ones who receive higher  
4 prices because organic farmers have certain challenges that  
5 conventional farmers do not face. Lower yields being one.  
6 And -- and basically, the public is willing to pay higher  
7 prices for food that hasn't been sprayed with chemicals.

8           Now, buyers downstream from the farmers in the farm  
9 to table chain, and which in our industry, by the way, involves  
10 something called "shelling processors," those buyers pass on  
11 the farmers organic premium to their customers, along with  
12 their own added premium, that is attributable to their own  
13 certification costs, and -- and maybe a little profit as  
14 handles, and all of that creates an organic premium over  
15 conventional prices. So I was very, very surprised when I was  
16 told by a local shelling processor that imported Turkish  
17 organic hazelnut kernels are now reaching negligible wholesale  
18 price points, compared to imported Turkish conventional  
19 kernels, which begs the obvious question, well, how -- how can  
20 that be happening unless Turkish farmers are receiving no  
21 premium or -- or, you know, cheating is involved in some --  
22 some fashion.

23           I obtained evidence that confirmed what I had been  
24 told on the pricing issue, along with substantial evidence of  
25 fraud in Turkey that is directly linked to grower group

1 certifications. In one case, a Turkish processor's organic  
2 premium was about 3 percent. Now, we -- we have a small  
3 organic hazelnut industry in Oregon that can't compete with the  
4 USDA rule that creates a recipe for fraud by allowing foreign  
5 interests to avoid farm inspections. Just a couple of months  
6 ago, this started to drive down our local farm commodity prices  
7 for Oregon organic hazelnuts by about 30 percent. That's this  
8 year compared to last. That's ballpark. And all of this is  
9 the reason for taking court action. Thank you.

10 CHAIR POWELL-PALM: Thank you very much for your  
11 comments. Nate Lewis has a question for you.

12 BD. MEM. LEWIS: I actually have two questions.  
13 First one's quick; do you call them "hazelnuts" or "filberts"  
14 because I'm --

15 MR. KASER: Well, the industry changed the name.  
16 They're traditionally called -- old school people still called  
17 filberts, but it's -- they're an international commodity so the  
18 local Oregon industry decided to rebrand them to hazelnuts so  
19 that we would go along with the rest of the world and not  
20 getting them confused. But I guess you're still confused.

21 BD. MEM. LEWIS: Well, yeah. And I'm -- I'm up in  
22 Olympia so I -- Olympia, Washington --

23 MR. KASER: Oh.

24 BD. MEM. LEWIS: -- so we still call them filberts  
25 up --

1 (Automated Message: Recording stopped.)

2 BD. MEM. LEWIS: -- at least colloquially.

3 My more serious question though has to do with  
4 residue testing and whether there are, as we kind of look at  
5 residue testing for a global supply chain, whether there are  
6 specific compounds that could help to root out at least the  
7 portion of those imports that may be truly fraudulently  
8 produced rather than produced organically, but without the  
9 oversight that you that -- you experienced as a certified  
10 producer here in the States. I'm kind of thinking, you know,  
11 glyphosate on the ground, and then does it -- you're harvesting  
12 from the ground, but I'm curious for your thoughts on --

13 (Automated Message: Recording in progress.)

14 BD. MEM. LEWIS: -- what sort of residue testing  
15 might be a practical deterrent?

16 MR. KASER: You cut out a little bit, but I think  
17 that's a pretty easy question for me to answer; I have  
18 absolutely no idea.

19 CHAIR POWELL-PALM: Fair enough. We have another  
20 question for you from Allison, followed by Jerry.

21 BD. MEM. JOHNSON: Thank you. I appreciate you  
22 bringing this to our attention today, and I -- I have lots of  
23 questions, but I'll just pick one for the moment.

24 I tend to think of grower groups as a useful tool to  
25 help smaller producers stay in the organic world, where costs

1 of certification, the process can be particularly cumbersome  
2 for our smallest scale producers, but they're also some of  
3 the -- the producers that consumers, I think, most imagine when  
4 they're purchasing organic food. So, I'm curious if you think  
5 there is a role for grower groups generally, and there's a -- a  
6 more narrow way to get at the -- the concerns that you're  
7 raising? Or if you think grower groups as a -- a concept as an  
8 institution have to go completely? And if the latter is the  
9 case, I'm curious to hear any other ideas to make sure that  
10 certification is in reach for smaller producers?

11 MR. CROTSER: I think that there may be a narrow  
12 window for the concept of Grower Group certifications if it's  
13 done the right way. But I think that the general concept of  
14 grower group certifications is 40 to 50 years out of date, and  
15 it's morphed into something completely different from what its  
16 original intent was, and it's just completely flipped over to  
17 the dark side of things. I don't think that the ideals of  
18 grower group certification are being implemented by and large  
19 or maybe some countries are different than others. But in  
20 Turkey, you cannot -- you cannot get onto -- on the USDA  
21 Integrity database and locate a single organic Turkish farmer,  
22 and that ought to tell you something.

23 CHAIR POWELL-PALM: Jerry, please go ahead.

24 BD. MEM. D'AMORE: Hello, and thanks for the  
25 opportunity to address on what you said. And I'm going to

1 probably cut myself short because I'm not sure how appropriate  
2 would I what I want to say is in terms of where we're trying to  
3 get to.

4 I spent six years in Turkey and any concern that you  
5 might have about the false flagging of products is certainly  
6 demonstrated to be legitimate. Love the people there, though.

7 My -- my one question of you would be, in terms of  
8 your lawsuit, is it the -- the lack of a price premium on the  
9 organic product that you were referring to as an underlying  
10 piece of that lawsuit?

11 MR. KASER: No. That --

12 BD. MEM. D'AMORE: Okay.

13 MR. KASER: -- that issue was the thing that started  
14 it all. That was the thing that got my attention. I think  
15 I -- I mentioned in my comments, as well. I heard this, how  
16 could that possibly be happening? I mean, you know, I -- I  
17 know -- you -- you folks wouldn't understand what "shell out"  
18 means in the -- in the -- in the nut industry, but anyone out  
19 here in Oregon that heard that Turkish processes are charging a  
20 3 percent organic premium in the U.S. market over convention  
21 prices, they'd immediately go what's going on with -- with  
22 that? So that was just the starting point.

23 But the -- the issue of the lawsuit is going to be  
24 follow the statute. We have a statute that says all farms have  
25 to be inspected every year by an accredited certifier.

1 BD. MEM. D'AMORE: Thank you very much. Do  
2 appreciate your response.

3 MR. KASER: Thank you.

4 CHAIR POWELL-PALM: Franklin, please go ahead.

5 BD. MEM. QUARCOO: This is a follow-up on Allison's  
6 question actually. So, given how important this grower group  
7 certification is to farmers with limited resources, small  
8 scale, I'm interested in your idea of what grower group  
9 certification done right is? What -- what is your idea of it  
10 being done right? What would you want to see with the grower  
11 group certification to consider it being done right?

12 MR. KASER: I think -- I'm going to repeat the  
13 question a little bit, just to make sure I've got it right.  
14 I -- I think what you're asking me is, what would be my idea of  
15 grower group certification being done right?

16 For one thing, I think that it's not going to work  
17 unless it's cut down to a, you know, a smaller number of  
18 farmers. I don't think you can have grower groups that consist  
19 of 1,000 members. I don't think that's going to work at all.  
20 The original idea was that a grower group would be a small  
21 group of growers, maybe -- maybe in a -- a village, you know,  
22 where all their plots are next door to each other. And so, you  
23 know, I think that's a starting point.

24 You know, organic certification to me is looking at  
25 what's happening on the farm. And so, if you've got one small

1 farmer with a plot next to another small farmer, you know, or  
2 three next to each other, then yeah, there might be a basis for  
3 certifying all three of those farmers together so that they  
4 can -- so that they can minimize their certification costs.  
5 Because the certifier -- and I have to say that for me going  
6 through the inspection process was highly educational. I  
7 really -- I liked it. I had the certifier there, we're walking  
8 around the farm, he's asking questions. And so, if you've got  
9 three plots right next to each other, it's awfully easy for the  
10 certifier to go through each one. And so, I think that's  
11 (audio distortion) have. We can't 1,000 have growers in  
12 different provinces or different towns or things like that; it  
13 just don't work.

14 CHAIR POWELL-PALM: We have a question for you from  
15 Kyla.

16 BD. MEM. SMITH: I have two; one will be quick.

17 The first one, I just want to make sure I heard you  
18 correctly. Did you say in the OID that when you look up  
19 Turkey, as a country, there's no certified operations? Or were  
20 you speaking only about hazelnuts?

21 MR. KASER: Hazelnuts. I'm sorry I'm not answering  
22 you.

23 BD. MEM. SMITH: Okay.

24 MR. KASER: I -- OID, I'm not connecting what that  
25 acronym is. So, in the --

1           BD. MEM. SMITH: Oh, the Organic -- oh, I'm sorry.  
2 So, can you just say what you said, maybe -- yeah I'm -- can  
3 you clarify --

4           MR. KASER: Okay.

5           BD. MEM. SMITH: -- what you said there?

6           MR. KASER: The USDA database called Integrity --

7           BD. MEM. SMITH: Yes.

8           MR. KASER: -- right. And so that --

9           BD. MEM. SMITH: Correct.

10          MR. KASER: -- enables the public to look up  
11 certified operations --

12          BD. MEM. SMITH: Right.

13          MR. KASER: -- farmers, handlers, and so forth.  
14 You'll not find -- you'll not be able to use that database to  
15 find a Turkish organic hazelnut farm operation. They're all  
16 handlers. They're all processors.

17          BD. MEM. SMITH: Got you. Okay, just clarifying. I,  
18 you know, think I maybe misheard you; I thought you -- I -- I  
19 knew what the database [sic], and I just was -- just anyway, I  
20 thought you said at all, no Turkish like certified organic  
21 operations at all, and I was like that can't be true, so I was  
22 confused.

23          MR. KASER: Well, actually -- actually, you should --  
24 you should look, it's -- it's quite fascinating. Once you  
25 start digging into looking at all certified operations, and



1 then you look at the number of handlers that are certified  
2 versus the number of what appears to be solely crops  
3 operations, which you would think are farmers, and you'll see a  
4 huge difference. There's lots of certified handlers, and there  
5 are not very many certified farmers. Okay, that was the thing  
6 that really kind of leapt out at me when I started going down  
7 this path. You know, the first thing I heard was about this  
8 pricing problem, and then I started looking at the database and  
9 I thought, oh my goodness, look at this.

10 BD. MEM. SMITH: Okay. And thanks. And my second  
11 question is, you know, for a long-time certifiers were  
12 operating off of an instruction document in the program  
13 handbook related to grow groups ,and now that the  
14 specifications have been codified in the Strengthening Organic  
15 Enforcement final rule, and I wonder if you think that that  
16 will help and move us in the right direction of certifying  
17 these types of groups in a more uniform way, and that  
18 certifiers might have a bit more oversight and enforcement  
19 because it's now codified versus being in the program handbook?

20 MR. KASER: Absolutely not. I-- I think that I would  
21 ask that you read complaint when it goes out it. It outlines  
22 the entire history of the process and problems with it. I  
23 don't think -- I don't think the new rule is going to make a  
24 bit of difference.

25 CHAIR POWELL-PALM: Well, we really appreciate your

1 comments, and thanks for taking all these questions.

2 Next up, we have Terry Shistar, followed by Sydni  
3 Arnone, and then Ellie Hudson.

4 Terry, please go ahead.

5 MS. SHISTAR: Okay.

6 MS. ARSENAULT: Oh, there we go. Yeah, I was going  
7 to say, just hang on a sec while we get your slides up.  
8 Thanks.

9 MS. SHISTAR: Okay, and I unmuted myself, so I just  
10 click on -- okay.

11 My name is Terry Shistar, and I'm on the board of  
12 directors of Beyond Pesticides. We've submitted comments on  
13 all the issues before the board, but my comments today will  
14 address the so-called inert ingredients. More details are in  
15 our written comments and in our 2017 report called "Inert  
16 Ingredients in Organic Production."

17 NOP has repeatedly tried to divert our attention from  
18 the crucial issue, one that has threatened the integrity of  
19 organic products for more than 20 years and continues to do so.  
20 The question that must be addressed is not whether these  
21 potentially toxic inputs should be individually evaluated, but  
22 how to do it.

23 To dispense with the faults to issue first, the  
24 evaluation of so-called inert synthetic ingredients in products  
25 in -- used in organic production is not optional; it's required

1 by law. NOP must allocate resources for this project. In  
2 addition, because of NOSB's intensive review of active  
3 ingredients, and the lack of oversight over other ingredients,  
4 the so-called inert ingredients pose greater risks than the  
5 active ingredients do.

6 Inert ingredients make up the largest part of  
7 pesticide products, and here I have a few examples, kind of  
8 pulled at random, and inert ingredients are not generally  
9 listed on pesticide labels, so NOP and the NOSB have been  
10 allowing unknown toxic mixtures to be applied to organic crops  
11 and livestock.

12 And now, on to the real issue of what we need to do.  
13 We estimate that there are 137 synthetic inerts currently used  
14 in organic production that must be evaluated. NOP must  
15 immediately publish the known list with a request that  
16 registrants of -- of products approved for use in organic  
17 production notify the NOP of the inert ingredients that are  
18 contained in their products.

19 We propose that the NOSB first insist on the  
20 publication of that list. The NOSB has undisputed authority  
21 over allowed synthetics in organic production and should not  
22 shy away from taking a strong position.

23 Second, we have proposed substitute language for  
24 these substances on the National List. On this slide, we just  
25 list categories of substances, as previously determined by the

1 Inerts Working Group, but more details are in our written  
2 comments. The exact assignment of inert ingredients to the  
3 review groups can of course be adjusted to meet the convenience  
4 of the NOSB and contracted reviewers. The subs -- this  
5 substitute listing should be approved at the Spring 2024  
6 meeting.

7 In short, the time to act is now. Thank you.

8 CHAIR POWELL-PALM: Thank you for your comments. We  
9 have a question for you from Allison, followed by Nate.

10 BD. MEM. JOHNSON: Thanks so much for your comments,  
11 Terry. I really appreciate it. I think we all agree that we  
12 need to tackle this issue, and having specific suggestions is  
13 going to be really helpful moving forward.

14 One thing that stood out to me is that you were able  
15 to come up with numbers. I've -- I've heard a lot of comments  
16 that we don't really know how many of these materials are being  
17 used, and so I'm wondering if you could say a little bit more  
18 about how you came up with your list and the number of products  
19 that you think are in play here, as a guide for NOP in -- in  
20 figuring out what materials they're actually dealing with?

21 MS. SHISTAR: Okay. I think that if you go back to  
22 that slide, it starts with the -- with the list of inert  
23 ingredients that are being used in products that are recognized  
24 by OMRI and -- WSCA and PCO. And then -- and then we looked at  
25 the 25(b), the materials on that list that are on EPA's 25(b)

1 list, which are things that don't have to be registered in --  
2 they're used in products -- in pesticides that don't need to be  
3 registered. And then -- so we subtracted off those. And then  
4 we subtracted off the -- the natural ones because they don't  
5 need to be evaluated as synthetic inerts. And what we -- what  
6 we came up with was about 137. Now, it might be a little bit  
7 more, a little bit less, but it's nowhere near the thousands  
8 that AMS was estimating.

9 BD. MEM. JOHNSON: Really helpful. Thank you.

10 CHAIR POWELL-PALM: Nate, please go ahead.

11 BD. MEM. LEWIS: Appreciate the -- sharing your  
12 opinion about the inerts needing to be listed individually.

13 And my question relates to whether that -- your --  
14 that opinion extends to the other lists that we have on the  
15 National List, like excipients and livestock drugs, vaccines?  
16 And -- and so I, what I'm trying to get to is, why are inerts  
17 unique in that folks want all of those listed individually but  
18 I'm not hearing the same call for particularly excipients is  
19 my -- I think the closest parallel in livestock drugs? Are --  
20 is there something unique about inerts that we're -- we're --  
21 I'm not -- I'm sort of missing?

22 MS. SHISTAR: Well, if you look at that slide that  
23 talks -- that that addresses the -- the toxicity of inerts  
24 versus the toxicity of the active ingredients, I mean  
25 personally this is coming from a group that's focused on

1 pesticides, so that's why we are focused on it, and we've been  
2 focused on this for decades, okay. And I think that this is a  
3 high priority because of that, because of the fact that we've  
4 got so many, you know, toxic substances that are being used as  
5 inert ingredients. Maybe after we take care of the inert --  
6 the inerts problem, we'll deal with the excipients, you know.  
7 It's just a priority. And I'd love to see what you have to say  
8 about the excipients.

9 BD. MEM. LEWIS: Oh, well I'm -- I'm just trying to  
10 see if there's any sort of inherent distinctions we need to  
11 make between inerts and all of the other lists that are  
12 referenced on the National List, in terms of whether it needs  
13 to be treated differently or similarly, so that's sort of the  
14 root of the question.

15 MS. SHISTAR: Yeah. Well, yeah. And I think that  
16 the biggest problem is the secrecy, and I -- I imagine that  
17 that's similar in -- in excipients but I haven't looked that  
18 closely at excipients.

19 CHAIR POWELL-PALM: All right, we thank you for your  
20 comments, Terry. Actually, Dilip has a question for you.

21 Please go ahead, Dilip.

22 BD. MEM. NANDWANI: Thank you for your comment.

23 The subcommittee in the board is really brainstorming  
24 on inerts, as probably you would know. I have little  
25 clarification, not really a big -- a question about the

1 toxicity you mentioned; is this a list you got from the  
2 pesticide's company? Or can you tell us a little bit more  
3 about it on this topic? Thank you.

4 MS. SHISTAR: Okay. In our -- in our report that we  
5 produced in 2017, we used a number of sources to identify the  
6 toxic -- the characteristics, you know, whether it's toxic or  
7 carcinogenic or whatever, of those chemicals, and that -- that  
8 summary slide that I presented was a summary of the ones that  
9 we -- that we could identify -- where we could identify the  
10 sources. And you'll find more information about where we  
11 actually went in that 2017 report.

12 And if you have any more questions, then let me know  
13 and I'll try to dig it up.

14 BD. MEM. NANDWANI: Thank you.

15 MS. SHISTAR: Thank you.

16 CHAIR POWELL-PALM: Brian, I saw your hand go up; did  
17 you have a question?

18 BRIAN CALDWELL: No thanks, right -- right now, Nate.

19 CHAIR POWELL-PALM: Okay, thank you.

20 Thank you again, Terry. Appreciate your time and  
21 your comments.

22 Next up, we have William Alberto Florez Calas. Are  
23 they on the line?

24 MS. ARSENAULT: We're not seeing William on the line  
25 with us, Nate, so thanks for checking, though.

1           CHAIR POWELL-PALM: Okay. Then we'll go to Sydney  
2 Arnone, then Ellie Hudson, and then Sarra Jahedi.

3           Sydni, if you're there, the floor is yours.

4           MS. ARNONE: Thank you. Good afternoon. My name is  
5 Sydney Arnone. I am the manager of Government Relations for the  
6 International Food Additives Council. IFAC is a global  
7 association representing manufacturers and end users of  
8 ingredients, including a number of substances permitted for use  
9 in organic handling.

10           IFAC strongly supports the Handling Subcommittee's  
11 recommendation to relist the non-synthetic substances gellan  
12 gum and potassium chloride, with synthetic substances  
13 alginates, mono- and diglycerides, phosphoric acid, xanthan  
14 gum, and the nonorganic agricultural substances, water  
15 extracted gums, including Arabic, Guar, Locust bean, and Carob  
16 bean. And de-oiled lecithin. These ingredients are safe, used  
17 in alignment with organic principles, and lack of organic  
18 alternatives completely (audio distortion). Each one of these  
19 has unique properties and applications, they are therefore  
20 essential to meeting the needs of the organic community and  
21 should be retained on the National List.

22           Today, I would like to emphasize the written comments  
23 as it pertains to potassium chloride and mono- and  
24 diglycerides. Potassium chloride is an important tool in  
25 reducing sodium content in food and helping support U.S.



1 policies on sodium reduction. We would like to note the FDA's  
2 proposed rule, the use of salt substitutes to reduce sodium  
3 content and standardize food labels, which seeks to amend  
4 various standards of identity to allow for the use of salt  
5 substitutes in foods where salt is a required or actual  
6 ingredient. Public review and comment for the proposed rule  
7 closed on August 8th and the Final Rule has not yet been  
8 published; however, it illustrates the role ingredients like  
9 potassium chloride play in reducing sodium content.

10 For mono- and diglycerides, I also would like to  
11 address the stakeholder questions posed in the Fall 2023  
12 meeting (audio distortion) document.

13 The first question, what organic products are mono-  
14 and diglycerides currently used in?

15 The USDA's FoodData Central database of Branded Foods  
16 from April 2023 contained 1,048,575 total brands. Of those,  
17 12,212, or 1.16 percent, of the items had organic in their  
18 ingredient list. Of those, 542, or 4.4 percent, contained  
19 monoglycerides and/or diglycerides in their ingredient list.  
20 This number may be seem -- may seem small at first, but we  
21 remind you that while monoglycerides are permitted globally in  
22 a variety of applications, their use in organic food production  
23 is limited to drum drying the food.

24 The second question was, have any other alternatives  
25 emerged?

1           We are not aware of any alternatives, which  
2 reiterates the importance for this ingredient coming on the  
3 National List of this application.

4           Thank you for your time and attention today. And I  
5 made it well under the time that I thought I was going to.

6           CHAIR POWELL-PALM: Crushed it. Well done. Well  
7 done.

8           Questions from the board?

9 (No response.)

10          CHAIR POWELL-PALM: All right, we really appreciate  
11 your comments, Sydni. Thank you.

12          MS. ARNONE: Thank you.

13          CHAIR POWELL-PALM: Next up, we have Ellie Hudson,  
14 followed by Sarra Jahedi, and then Mark Lipson.

15          MS. HUDSON: Hi, Nate.

16          CHAIR POWELL-PALM: Hi, Ellie.

17          MS. HUDSON: Hi, everyone. I'm Ellie Hudson,  
18 executive director of the Accredited Certifiers Association, or  
19 ACA.

20          ACA is a nonprofit that exists to benefit the  
21 accredited organic certifier community and the organic  
22 industry. Broadly, we look to develop certifier resources that  
23 can alleviate the pressure often germane to a regulatory  
24 environment, and we proactively seek ways to add, improve, and  
25 innovate the value of ACA membership.

1           We envision an environment where barriers and  
2 implicit bias have been eliminated and where everyone has the  
3 resources they need to live up to their full potential in all  
4 aspects of our work.

5           ACA has developed new certifier resources toward  
6 consistent implementation of the SOE rule. In pursuit of  
7 consistency, various collaborations and educational programs  
8 are available. Creating this environment of consistency among  
9 certifiers can generate a ripple effect that benefits everyone.  
10 These activities are provided free of charge to the  
11 certification community as part of a cooperative agreement  
12 between NOP and ACA.

13           Also funded through our cooperative agreement, we are  
14 partnering with the international Organic Inspectors  
15 Association, or IOIA, around mentorship of aspiring organic  
16 inspectors. The data gathered in our 2023 mentor cohort will  
17 be analyzed and used to develop resources aimed at making  
18 mentoring more efficient, accessible, and enticing.

19           ACA is also a partner in a project led by Organic  
20 Farmers Association in pursuit of racial equity and justice in  
21 organic. This project aims to provide continuing diversity  
22 education and concrete tools for organic professionals through  
23 a cohort learning model focusing on questions and challenges  
24 that are organizational in nature. Certifiers in the inaugural  
25 cohort have reported deep opportunities for growth and change

1 in a supportive and constructive environment. Applications for  
2 the second racial equity cohort for certifiers will open on  
3 November first.

4 The ACA board also identified a strategic need to  
5 better understand our supportive membership category, available  
6 for those who are not accredited certifiers but have an  
7 interest in supporting ACA's mission. As a result of the  
8 steering committee's survey of existing members, and soon  
9 prospective members, we are beginning to understand what you  
10 want from ACA and how we can deliver more value.

11 I must also mention that 2024 will mark ACA's 20th  
12 anniversary. I am truly amazed and humbled that many of the  
13 founding certifiers who created ACA are still active in our  
14 community, and many of you are here today. We have some  
15 special things planned to recognize and thank you throughout  
16 the year. I feel like I'm standing on the shoulders of giants  
17 with this opportunity to offer these comments.

18 Thank you for your work in getting us to this point  
19 and thank you to the board.

20 CHAIR POWELL-PALM: Thank you for your comments,  
21 Ellie.

22 Questions for Ellie? Amy, please go ahead.

23 SECRETARY BRUCH: Yeah, Ellie, thank you so much.  
24 Congrats on the anniversary. And all of the best practices and  
25 resources that you provide certifiers, it's pretty impressive.

1           You highlighted your -- some of the collaboration  
2 efforts that -- that your organization is doing, and that  
3 actually dovetails with my question about collaboration.  
4 Through other written comments in regards to our testing --  
5 residue testing in a global supply chain discussion document,  
6 there were comments from inspectors about the desire to  
7 collaborate with ACA in editing, enhancing the current risk  
8 management matrix that's out there.

9           Would -- would that be something your organization  
10 would be open to because it does sound like you do cross-  
11 collaboration?

12           MS. HUDSON: Definitely. Yeah, I think that's  
13 really helpful. I appreciate that you shared that. We're  
14 actively and -- and really intentionally trying to provide more  
15 opportunities to include not just staff inspectors, which are  
16 already part of certification agencies, but also really looking  
17 at cooperative or independent inspectors as part of the  
18 certifier ecosystem. So, this has manifested in many ways and  
19 we're always excited to find new ones, and I think that this is  
20 something we can definitely take up. So, I'll take a look.

21           SECRETARY BRUCH: Okay. Excellent, Ellie. Thank you  
22 so much.

23           CHAIR POWELL-PALM: Nate Lewis, please go ahead.

24           BD. MEM. LEWIS: Can folks hear me? My Internet's a  
25 little unstable. Yeah? Okay.

1           This is -- and I this -- well, common refrain that  
2 Amy made, testing tag team here. I noticed a comment from one  
3 of your members, I believe it was OFA, talking about the cost  
4 of residue testing which must be borne by the certifier, at  
5 least from the periodic residue sampling angle.

6           I'm curious, and so this is inspired by your  
7 cooperative agreements and funding, have you approached NOP  
8 about a way to sort of help cost share that testing financial  
9 burden and whether there's some funds for SOE implementation  
10 that could go to that realm or reimbursement? I'm -- I'm just  
11 brainstorming but I'm curious if that's something you all would  
12 be willing or have already taken up?

13           MS. HUDSON: Yeah. You know, we haven't had that  
14 conversation, but we definitely can. And I think, you know, we  
15 have some funding that's reserved and very generally for SOE  
16 support, especially around implementation, so I think that's  
17 certainly a conversation we can have. We meet with them  
18 monthly to just sort of gauge as things change out in the in  
19 the ecosystem, the certifier network, you know, that we can be  
20 a little bit more nimble with this cooperative agreement. So.

21           BD. MEM. LEWIS: Let us know if a recommendation from  
22 the board could be helpful in those conversations.

23           MS. HUDSON: Thanks. Yeah, I will.

24           CHAIR POWELL-PALM: Quickly, just a question for you,  
25 Ellie. For those who are joining us next week in Providence,

1 what's happening on Wednesday night?

2 MS. HUDSON: Well, you're cordially invited to join  
3 ACA and an alphabet soup network of cohosts that I'm -- because  
4 I'm not reading it right now, I'm going to -- I don't want to  
5 skip anybody, but ACA and a number of cohost organizations  
6 invite you to join us at -- for a Happy Hour reception at  
7 Bayberry Beer Hall. So, we'll provide a couple of drinks, and  
8 lots of food. I'm always nervous doing Happy Hours, that you  
9 have to have a lot of food there because people haven't had  
10 dinner yet. So.

11 CHAIR POWELL-PALM: Wow. Well, thank you for  
12 hosting.

13 MS. HUDSON: Yeah.

14 CHAIR POWELL-PALM: We're excited to join you.

15 MS. HUDSON: You can see a link -- I don't know if  
16 it's -- if we actually put a link on the ACA website, but you  
17 can also e-mail me or any of the ACA team, if you want to  
18 register to attend. Thanks.

19 CHAIR POWELL-PALM: Perfect. All right, thank you.  
20 See you next week.

21 Next up, do we have Sarra Jahedi on the call? Are we  
22 seeing her, Michelle?

23 MS. ARSENAULT: We are not seeing Sarra. Let me just  
24 double check once more. Nope, I don't see her, Nate.

25 CHAIR POWELL-PALM: Okie doke. Then we're going to

1 jump to Mark Lipson, followed by Jay Feldman Dan Langager, and  
2 then Brian Baker, and then we're going to break folks. And I  
3 never say we're behind because we are exactly where we should  
4 be with how good the conversation's been.

5 But Mark, please go ahead.

6 MR. LIPSON: Hi, Nate. Hi, everybody. Thank you for  
7 all your incredible -- incredibly hard work. I'm a member of  
8 Molino Creek Farm where I've been for 40 years. Molina Creek  
9 Farming Collective. I do have a consulting practice.  
10 Currently doing some work with CCOF, the Heartland Health  
11 Research Alliance, and the -- the Wolfpack Associates. I'm  
12 also a pro bono affiliate of the Center for Agroecology at  
13 University of California Santa Cruz, where I'm nurturing the  
14 seedlings of an organic agroecology policy program.

15 I want to cover real quick inerts, residue testing,  
16 transition partnerships, Climate Smart Verification, and the  
17 status of my former job at USDA as the organic policy adviser  
18 to the Office of the Secretary.

19 On inerts, I just think it's very, very clear all  
20 inerts have to be declared; cannot remain hidden behind  
21 proprietary confidential information and have to be reviewed by  
22 the board. So, I support the comments of NOC. I'll point you  
23 to the written comments recently from Dr. Charles Benbrook, Dr.  
24 Brian Baker, and others, and I support Terry Shistar's comments  
25 just presented.



1           And just a week ago, EPA, you know, issued a denial  
2 of a petition from Center for Food Safety for review of all  
3 inerts. Made it very clear that they don't have any interest  
4 in holding up their end of the statutes that govern their  
5 responsibility for regulating inerts, and the USDA and NOP  
6 can't be hung up by EPA's failure. So, the obsolescence of  
7 List 4 is really kind of a red herring.

8           On residue testing, I agree with the assertion that  
9 better -- a better system for the whole program is more  
10 important than increasing the amount of testing per se. What's  
11 needed is a unified system with bulk lab contracts to reduce  
12 the cost for everybody involved, create a common protocol, and  
13 in doing so create the ability to distinguish across the whole  
14 industry the hotspots of actual contamination from the small  
15 hotspots of increased ability to detect ever smaller amounts.

16           So, I ran out of time, but I'll just very briefly  
17 say, there's nobody in the job that I previously held, and  
18 which was previously held by Marni Karlin at USDA. That's a  
19 big problem for Climate Smart Verification, for transition to  
20 organic, and a number of other things. Somebody --

21           CHAIR POWELL-PALM: Thank you.

22           MR. LIPSON: -- needs to step up and be willing to  
23 serve in D.C. and do that job. Thanks.

24           CHAIR POWELL-PALM: Thank you, Mark. We've got some  
25 questions for you, so I don't mean to cut you off, but want to

1 get -- get those here.

2 MR. LIPSON: Yeah.

3 CHAIR POWELL-PALM: Brian, go ahead.

4 BRIAN CALDWELL: Yeah. Thanks so much, Mark. I was  
5 hoping that very briefly you could cover the rest of your  
6 topics because it seems like you were going to run out of time.

7 MR. LIPSON: Well, what I wanted to say about  
8 transition to organic program is that it, you know, it's two  
9 orders of magnitude more resources than we ever had, you know,  
10 10 years ago for doing anything around our organic transition,  
11 but it doesn't have a goal. USDA has chosen to launch this  
12 program without actually having a goal, and I think that's  
13 problematic, and I think that, you know, maybe the NOSB could  
14 be a factor in getting the department to do that. Or  
15 engaging -- you know, creating a dialogue that would help the  
16 industry or the community create a goal.

17 On the Climate Smart Verification, I think it's  
18 really, really highly problematic how that's being pursued, and  
19 we need to get organic, you know, integrated directly, not  
20 just, you know, sort of a secondary aspect of whatever Rube-  
21 Goldberg-counting-the-carbon-angels scheme is going to arrive.  
22 So, again, you know, maybe the NOSB can help conduct a dialogue  
23 that would communicate that directly to the high -- highest  
24 leadership at USDA.

25 Thanks for the question, Brian.

1 CHAIR POWELL-PALM: Allison.

2 BD. MEM. JOHNSON: Thanks so much, Mark. I had a  
3 question already, and your answer just spurred another one, so  
4 bear with me.

5 The first -- I really appreciate you bringing up  
6 inerts, and then the need to deal with this issue promptly and  
7 thoughtfully. And as someone who's worn a lot of different  
8 organic hats, I'm wondering if you have any advice or  
9 suggestions for us on how to deal with this sort of like  
10 cumbersome topic and the actual process of getting these  
11 materials reviewed?

12 And then my second question is, what -- what should  
13 we set as the goal for TOPP?

14 MR. LIPSON: I don't -- on the second question, yeah,  
15 I think it's -- there's a lot of different variables, and the,  
16 you know, the market development part of it, you know, which  
17 isn't well integrated with the partnerships program, it is  
18 really, really a key thing. I just think there's important  
19 economic analysis that could be done. ERS should be part of  
20 this process to establish a, you know, realistic but ambitious  
21 goal that's differentiated in different segments of the supply  
22 chain. And the emphasis absolutely needs to be on domestic  
23 production. You know, we're -- we're relying on imports;  
24 that's where the emphasis of the goal ought to be.

25 And your first question, I'm sorry, Allison, on

1 testing?

2 BD. MEM. JOHNSON: Any advice for reviewing the  
3 inerts kind of process; how do we tackle getting these  
4 materials reviewed?

5 MR. LIPSON: Well, I think Terri's suggestions were  
6 very constructive and totally plausible. I do think, you know,  
7 the number is -- is not astronomical.

8 You know, to give the benefit of the doubt to  
9 program, the I saw the ANPR as a cry for help from the  
10 community to do something at the legislative level, you know,  
11 which they can't really mention or suggest, to get them the  
12 resources to do it and/or, you know, get them off the statutory  
13 hook of the obsolete EPA list. Does that make sense?

14 BD. MEM. JOHNSON: Yeah. Thank you, sorry; I am  
15 furiously typing notes for me. Appreciate it.

16 CHAIR POWELL-PALM: Amy, please go ahead.

17 SECRETARY BRUCH: Yeah, Mark, thanks for joining us  
18 today.

19 I just wanted to dive in deeper on something you  
20 mentioned in regards to residue testing. You mentioned we  
21 needed a better system as a whole, common protocols, a unified  
22 system with bulk lab contracts, and then you mentioned the  
23 ability to distinguish the hotspots of contamination.

24 So, that last one, I wanted you to elaborate on that  
25 further; what -- what do you think are the best methods to

1 distinguish these hotspots of contamination?

2 MR. LIPSON: Well, we saw in, I think it was 2018  
3 maybe, Consumer Reports using the work of Dr. Benbrook and the  
4 Dietary Risk Index that he compiles from the USDA residue  
5 testing programs, and fruits and vegetables, certain fungicides  
6 showing up on a lot of organic spinach. You know, that's an  
7 example.

8 SECRETARY BRUCH: Um-hum.

9 MR. LIPSON: Wasn't -- didn't appear to be a matter  
10 of fraud but, you know, a systemic problem of, you know,  
11 colocation of supply chains, you know, or something in the  
12 handling chain. That's very, very different from what I think  
13 a lot of certifiers are dealing with of these, you know, spot  
14 flashes of contamination that show up because the levels of  
15 detection are -- are constantly going down. And -- but we  
16 don't have a way, besides the analysis from, you know, USDA's  
17 market sampling program, that only, you know, includes a  
18 portion, you know, a fraction of the organic sector with it.  
19 We don't have a way of combining all the results from all the  
20 certifiers. I think this is part of what Bruce -- or excuse  
21 me, Michael Crotser was talking about, you know, where's the  
22 analysis of what the residue program -- residue testing program  
23 as a whole shows? What -- what are the patterns? We need to  
24 be able -- you know, we would be able to see those patterns.  
25 They would be illuminated if we had a combined program of all

1 the certifiers, not necessarily dictating what they each have  
2 to test for, but where all the results were going into one  
3 common system. But right now, they use different labs, they  
4 use different protocols, the results can't be compared.

5 So, that's the direction that it needs to go in.  
6 Does that make sense?

7 SECRETARY BRUCH: Yes, it does. Thank you, Mark.  
8 Appreciate that.

9 CHAIR POWELL-PALM: All right.

10 MR. LIPSON: And I will be very happy to see you all  
11 next week.

12 CHAIR POWELL-PALM: Looking forward to it. Thank  
13 you, Mark.

14 MR. LIPSON: Thanks.

15 CHAIR POWELL-PALM: Thank you for your comments.

16 Next up, we have Jay Feldman, then Dan Langager,  
17 Brian Baker, and then we break. After the break, we have  
18 Kailey Williams, and then Julie Barton.

19 Jay, please go ahead.

20 MR. FELDMAN: (No audible response.)

21 MS. ARSENAULT: Jay, you're on mute.

22 MR. FELDMAN: oh, boy. Hi, I'm Jay Feldman,  
23 executive director of Beyond Pesticides, former NOSB member.  
24 Thank you for your service on the NOSB.

25 Beyond Pesticides is bridging consumer, farmer, and

1 environmental interest and taking on the challenges of our  
2 existential crises, and environmentally induced diseases,  
3 biodiversity collapse, and the climate emergency.

4           We believe deeply in the value of organic land  
5 management, including food production, is key to meeting these  
6 challenges, but this is only the case if the NOSB is a steward  
7 of the USDA organic label, ensures the integrity of the NOSB's  
8 oversight role, and exerts its authority as intended by  
9 Congress. The NOSB decisions this session, National List  
10 management, and Standards guidance are key in the process that  
11 establishes organic integrity. This process by design was  
12 borne out of ineffective laws and standards governing clean air  
13 and water farmer protection and food safety; laws that have  
14 brought us to the brink of ecosystem collapse. Organic is the  
15 path forward to sustainability.

16           With that said, there are critical issues before the  
17 board. Issues that intersect with the existential crises, and  
18 ones that define the future. Yes, organic is a small  
19 percentage of overall food production, but what this sector has  
20 established as a model for the path forward, so decisions that  
21 are now before the board are critical in that light. I'll  
22 highlight the critical intersections with several key issues  
23 before the board.

24           You've heard and read our position on inerts. When I  
25 was an NOSB member, we reached a unanimous decision for

1 streamlined -- a plan for review; this is now blocked by USDA  
2 and undermines integrity.

3 OFA requires national listings "by specific use or  
4 application." Not enforced by USDA; undermines integrity.

5 We must move away from petrochemical plastics as  
6 incompatible with organic and transition to alternative  
7 mulching cover and intercropping systems. No action undermines  
8 integrity.

9 Reduce reliance on nonorganic ingredients, §205.606.  
10 The NOSB Hops decision nearly a decade ago taught us that  
11 organic supply is a function of demand. Similarly, organic  
12 guar gum, organic Locust bean gum are now used by a major  
13 organic processor. A failure to not relist -- a failure to not  
14 relist nonorganic versions undermines integrity.

15 The liquid fish annotation adopted by this board is  
16 not being enforced by NOP with the comment, "Technical  
17 complexity of marine environment makes rulemaking on this topic  
18 problematic." This must be brought back to the board: NOP is  
19 undermining a critical ecosystem issue, board process, and  
20 integrity; an egregious failure that requires a board vote to  
21 not resist pending NOP compliance with process.

22 Organic agriculture with deep farmer and consumer  
23 investment is cherished, as the leading edge of change required  
24 for a livable future. Please, don't let it be undermined.

25 Thank you. And thank you again for your service.



1 CHAIR POWELL-PALM: Thank you for your comments. All  
2 right, we appreciate you.

3 MR. FELDMAN: Thank you.

4 CHAIR POWELL-PALM: Next up, we have Dan Langager,  
5 followed by Brian Baker, and then we're going to take a five-  
6 minute break. After the break, we have Kailey Williams.

7 Dan, the floor is yours.

8 MR. LANGAGER: Great. Thank you so much. It's  
9 pronounced Long-au-ger (ph), but no worries.

10 CHAIR POWELL-PALM: Thank you. I'm so sorry.

11 MR. LANGAGER: Not the first time.

12 Hello, everyone. My name is Dan Langager. I'm with  
13 the Northwest Horticultural Council, and we represent the  
14 growers, packers, and shippers of apples, pears, and cherries  
15 in the Pacific Northwest, who produce the majority of our  
16 country's organic palm fruit.

17 I'd like to direct you to our extensive written  
18 comments, or the Pacific Northwest Tree Fruit Industry's  
19 perspective on the various Sunset materials before the board,  
20 as well as on the inert ingredients issue. But today I'll  
21 highlight some of the materials under crops that are of  
22 particular importance to organic tree fruit growers.

23 Ethanol and isopropanol alcohols; these are critical  
24 tools for orchardists to decontaminate the lines of their  
25 irrigation systems, and to disinfect a variety of on-farm

1 implements, like cooking.

2 Lime sulfur and elemental sulfur are used by the vast  
3 majority of organic tree fruit growers. Lime sulfur helps  
4 control diseases, like blight, mildew and scab, and various  
5 orchard insect pests, especially any that may have over winter  
6 [sic].

7 Elemental sulfur is an essential tool for organic  
8 tree fruit production for controlling pest mites that damage  
9 leaf tissue, disease pathogens like scab and brown rot. And  
10 it's the only material organic growers can use in their on-farm  
11 sulfur burners, which help us deal with the often alkaline  
12 waters here in the Pacific Northwest, adjusting the soil pH to  
13 ensure better nutrient uptake and water penetration.

14 Plastic mulches and covers. All right, so these  
15 offer numerous tree fruit production benefits. We use them for  
16 bird nets, windscreens, shade cloths, weed materials. Leaf  
17 hopper pests in cherry orchards vector the causative pathogen  
18 of Little Cherry Disease, which is now epidemic in Washington  
19 State, but by covering the broad leaves and the other leaves,  
20 the weed maps have proven a significant useful deterrent,  
21 reducing leaf hopper numbers by 80 to 90 percent. Ground  
22 covers can be used to reflect light up into the tree canopy;  
23 this is done early in the season to help promote bloom, and  
24 then before harvest it helps the fruit gain some additional  
25 color and maturity. Drape Nets are deployed to keep the brown

1 marmorated stink bug and other insect pests out of the Orchard.  
2 And netting and shade cloth can be used for protection from  
3 hail and sunburn.

4           The cost to organic growers to set up these nets in  
5 their orchards is significant. An investment of hundreds of  
6 thousands of dollars in infrastructure and maintenance. And as  
7 the subcommittee has noted, removing plastic mulching covers  
8 from the National List would not actually prohibit their use.  
9 This annotation allows growers to work with their certifiers to  
10 ensure that their system meets OFA and best practices  
11 standards.

12           And then finally on the inert ingredients, just to  
13 state that -- that their importance, it cannot be overstated,  
14 really, it's -- as they are part of every chemistry used in  
15 organic production. And so, we encourage the board to take a  
16 deliberative scientific approach to any changes to the listing  
17 of the inerts that does not add to the workload of the NOSB or  
18 put the availability of products critical to organic food  
19 production at risk.

20           I just want to give a big thank you and huge kudos to  
21 all the board members at the NOSB. Thanks so much.

22           CHAIR POWELL-PALM: Thank you for your comments. We  
23 have a question for you from Amy.

24           SECRETARY BRUCH: Hi, Dan.

25           MR. LANGAGER: Hi.

1           SECRETARY BRUCH: Thank you for your time today. Hi.  
2 I just --

3           MS. ARSENAULT: Amy, you just muted.

4           SECRETARY BRUCH: Oh, goodness.

5           MS. ARSENAULT: Okay.

6           SECRETARY BRUCH: Not sure how that happened but,  
7 okay, we'll start over.

8           Thank you, Dan, for your comments. I just wanted to  
9 confirm your organization's stance on the petition substance  
10 potassium sorbate.

11           I saw that you provided comments in the spring in  
12 support of potassium sorbate as a disease control, as it's  
13 petitioned for disease control, but it didn't any comments this  
14 go-round submitted from your organization, so I just wanted to  
15 confirm that -- that you're still in support of that substance  
16 or if anything changed.

17           MR. LANGAGER: We left it out of our comments this  
18 round because after going back to our growers and some of our  
19 other consultants, it might not be the right time for that. We  
20 didn't get a lot of feedback that it would provide a  
21 significant change or a significant benefit. We know that some  
22 of the subcommittee deliberations were pretty on the fence one  
23 way or the other and so in order to fully defend that, in order  
24 to -- to provide a -- a full scope and a full picture I think  
25 we would need to go back and do some more deliberation and --

1 and figuring out of what it -- exactly how it could affect --  
2 how it could benefit the tree fruit industry.

3 SECRETARY BRUCH: Okay, thank you. That's helpful.  
4 I -- I did see it more extensive. It seemed like comments  
5 surrounding powdery mildew on your elemental sulfur submission.

6 MR. LANGAGER: There are other -- yes, there are  
7 other things like that we can depend on.

8 SECRETARY BRUCH: My -- question then. Okay, great.  
9 Thank you so much.

10 MR. LANGAGER: Thanks.

11 CHAIR POWELL-PALM: Thank you, Dan. We hope to see  
12 you next week.

13 MR. LANGAGER: We'll see you there. Can't wait.

14 CHAIR POWELL-PALM: All right, take care.

15 Last up before our break is going to be Brian Baker.  
16 after our break of minutes, we're going to have Kailey  
17 Williams, Julie Barton, and then Harold Austin.

18 Brian, the floor is yours.

19 MR. BAKER: Brian Baker, Belcainr Concerns.

20 First, I want to thank the NOSB and NOP for the  
21 opportunity to comment and express gratitude for all your hard  
22 work. The opinions expressed are my own and do not necessarily  
23 reflect those of my clients or -- of any organizations for  
24 which I serve in a governance or policy setting capacity. My  
25 comments are on Sunset, and specifically on the request for

1 comments on inert ingredients formulated in pesticides used for  
2 organic production; a subject on which I've worked since 1988.

3 Please understand that every ingredient in a  
4 pesticide formulation has a function and serves a purpose. For  
5 any synthetic substance to be added to the National List, the  
6 OFA requires they must both be necessary for organic production  
7 and handling and meet the OFA criteria. The burden to prove  
8 necessity and compatibility is on those who seek to use these  
9 synthetic substances. The NOSB should not, and in my opinion  
10 cannot, proceed until there is full public disclosure of all  
11 substances that are allowed or proposed to be allowed in  
12 formulated pesticides for organic production.

13 The OFA requires that synthetic substances be on the  
14 National List be necessary and -- and meet the OFA criteria.  
15 The NOSB's recommendations based on these requirements need to  
16 be taken into account: what formulants are necessary to  
17 deliver pesticide; what specific substances are needed; why  
18 they're needed; and how they meet the criteria. EPA clearance  
19 is a necessary, but not a sufficient condition, to put -- put  
20 the inserts on a -- on the National List.

21 Many formulants have biological activity and toxicity  
22 profiles. The -- and greater toxicity than the actives  
23 themselves. They often work through synergy, through increased  
24 biological uptake by providing a longer window of biological  
25 activity, increased persistence of -- of the active

1 ingredients. Growing body of scientific evidence shows that  
2 formulated products are more toxic and have greater adverse  
3 effects on the environment than the active ingredients alone.  
4 Biological and chemical ecosystem are part of the 2119(m)  
5 criteria. We need to know what we're talking about before we  
6 can talk about it. The ANPR public comments showed a consensus  
7 that most of the formulants used for organic production are  
8 necessary and meet the criteria. A relatively small, in my  
9 opinion, manageable number should be the focus of Sunset.

10 The NOSB has a statutory mandate to work with EPA and  
11 the manufacturers. Full public disclosure has legal precedents  
12 that show the public interest of knowing what's in pesticides  
13 outweighs the need for confidentiality. The USDA and EPA  
14 collaborated on implementation in the past. Please consider my  
15 written comments. And I call attention to Heartland Health  
16 Research Alliances' comments to the ANPR.

17 I welcome your questions.

18 CHAIR POWELL-PALM: Thank you. We have some  
19 questions for you.

20 Brian Caldwell, please go ahead.

21 BD. MEM. CALDWELL: Thanks, Brian. It's great to  
22 hear your comments. I'm very excited that we can address this  
23 issue which, is just so difficult, but so -- so important. And  
24 I guess I-- I'm very pleased to hear you strongly support the  
25 disclosure of -- of inert ingredients. I think that makes

1 sense.

2 Do you think that they should -- that -- that that  
3 sort of disclosure should be -- needs to be tied to the actual  
4 product? Or can a company just ask for a, you know, sort of a  
5 put it on a blanket list and say we -- we would like this  
6 material -- or we disclose this this material, that we use it,  
7 but not tie it necessarily to a -- to a specific product? I'm  
8 just -- I'm curious about that, especially because I don't want  
9 companies to be just like disclosing a whole bunch of things  
10 that they would like to use but they're not necessarily using  
11 right now.

12 MR. BAKER: Well, yeah. I -- I think they can be --  
13 you -- you don't have to link the two, but I think that some  
14 form of justification is needed.

15 I -- you know, ideally pesticide formulations would  
16 be like shampoo bottles; you know, you don't need to know the  
17 percentages, but you need to know what's in -- what -- what  
18 the -- chemicals are -- are in there. Add I -- I think that  
19 for the purpose of evaluating under the 2119(m) criteria that  
20 one needs to be able to at least assess some of these -- some  
21 of these questions, such as the interactions and what -- what  
22 synergistic effects there might be. What effects or impacts  
23 there might be on nontarget organisms. So, you know, I -- I  
24 think that -- the process will be self-limiting.

25 I could be wrong. I mean, we've -- you know, we



1 greatly underestimated the petition process in the past and we  
2 could find ourselves overwhelmed with petitions for people  
3 who -- who want to use things on speculation that they don't  
4 really need or, you know, they just want to experiment with,  
5 and they may not end up with in the final formulation.

6           But I will say that manufacturers and formulators  
7 would like a larger list of substances to work with, and if  
8 they're formulating for the organic market, they don't want to  
9 go to the trouble of field testing and then find out oops, it's  
10 not going to -- it's not going to fly. So, I -- I think  
11 there's, you know, there's -- there needs to be give and take  
12 and -- and I'm -- what I'm asking for, really, is what's in --  
13 in the statute; that the NOSB needs to work with the  
14 manufacturers. It's -- it shouldn't be an adversarial process.  
15 It should be a collaborative process, open and transparent, and  
16 you know, a lot of these are are -- are intended to reduce the  
17 amount of active that's used. They -- they do have some  
18 beneficial effects, and that needs to be weighed in, as well.

19           So, you know, it's -- it -- it's a matter of getting  
20 the information and -- and figuring out how to proceed from  
21 there.

22           BD. MEM. CALDWELL: Yeah, thanks Brian.

23           CHAIR POWELL-PALM: Allison, please go ahead.

24           Followed by Nate.

25           BD. MEM. JOHNSON: Thanks for taking the time to be

1 here, Brian, and for your comments, both written and oral.

2 Picking up on the -- the to how many products are we  
3 dealing with question. Terry presented an estimate, sort of in  
4 the one to two hundred range earlier.

5 Does that sound to you like the -- the ballpark that  
6 we're working with? And is there any way that you'd recommend  
7 prioritizing or, you know, spreading this over time to make the  
8 process manageable?

9 MR. BAKER: I -- I think the key is really to look to  
10 EPA. I mean, it's not my job or Terry's job or your job to  
11 figure out how many substances we're talking about; it's the  
12 people who want to have those substances allowed for use.  
13 That -- it's their job to come forward and say, here's what  
14 we -- here's what we use, here's what we want to use, what do  
15 you think?

16 I, you know, I came up with a smaller list than Terry  
17 did based on certain assumptions and based on perhaps an overly  
18 optimistic view of how the USDA and EPA could collaborate and  
19 find some common ground on taking certain things off the table  
20 and off of the NOSB's workload but, you know, I think -- I  
21 don't want to call it worst case scenario, but I think Terry is  
22 sort of at the top end of -- of what the list is. I -- I think  
23 we could be down to like 20 or 30. But yeah, I mean it's we --  
24 we need to know what we're talking about before we can come up  
25 with an estimate; otherwise, we're just, you know, whistling in

1 the dark.

2 CHAIR POWELL-PALM: Nate, please go ahead.

3 BD. MEM. LEWIS: I asked Terry this question, and  
4 I'll ask it -- you, as well; is there anything unique about  
5 inerts, particularly in contrast to excipients that require  
6 their individual listing? I'm just -- I'm worried we're  
7 unleashing a beast, right --

8 MR. BAKER: (Laughs).

9 BD. MEM. LEWIS: -- and I know --

10 MR. BAKER: The best is out. No. I mean, there - -  
11 this is --look, I was -- you know, I was at CCOF in 1988, and  
12 that was -- that was like when the dam burst on inerts, okay.  
13 They are different. They're different for a lot of different  
14 reasons, and they're -- they're put in the statute in a unique  
15 way for a reason. Let's not forget that history. Let's not  
16 forget what has gone on with inerts since before there was an  
17 OFA. Since before there was an NOP. I mean, this is -- this  
18 is a thorny issue. This has a lot to do with the -- the way  
19 that so much of the OFA was driven by the Alar crisis and  
20 the -- the way that pesticides are regulated. And we have --  
21 you know, I -- I want to echo what Mark Lipson said earlier,  
22 this is a cry for help. It's -- we're dealing with obsolete  
23 lists that the Food Quality Protection Act happened six years  
24 after OFA, okay, and that gave EPA a mandate to rereview all  
25 chemicals used in pesticides and do a risk assessment on using

1 different models on the inerts that they had. You know, the --  
2 the four list process came out of the 1980's when there were  
3 known carcinogens being used as inert ingredients in  
4 pesticides, and the EPA didn't -- didn't ban them, you know,  
5 willingly; they had to be dragged into it kicking and screaming  
6 so, you know, this is -- is a long complicated issue with a lot  
7 of history that is very different from the other things we see  
8 on the National List.

9           And they are different from excipients in animal  
10 drugs. There's a lot more disclosure. Veterinarians have a  
11 lot more access to the information on excipients than pest  
12 control advisors have on the inert ingredients used in  
13 pesticide formulations, with ancillary ingredients and -- and  
14 food processing and food additives. There's also, because of  
15 allergens, because of other food safety issues, there's a lot  
16 more access. Inerts are -- are misnamed. Other than helium or  
17 argon, you -- you're not dealing with anything that's truly  
18 inert. They're -- they all are functional. They all are  
19 active. They all have a purpose, and they all need to be  
20 disclosed.

21           CHAIR POWELL-PALM: And with that, we thank you for  
22 your comments, Brian.

23           We're going to go to our break. We're going to come  
24 back at 15 minutes after the hour, and when we come back for  
25 [sic] our break, we're going to start with Kailey Williams.

1           Kailey, if you're on the call, could you please just  
2 jump in the chat and let yourself be known. If Kailey's not  
3 here, then we'll go to Julia Barton, Harold Austin, and then  
4 Tracey Dion.

5           All right, see you all back at 15 after the hour.

6           (Whereupon, a brief recess was taken.)

7           CHAIR POWELL-PALM: Julia, please go ahead

8           MS. BARTON: Can you all hear me?

9           CHAIR POWELL-PALM: We can.

10          MS. BARTON: Okay. You're gonna have to give me just  
11 one moment of grace here. I am -- just pulled into the cell  
12 phone lot at the airport, but I am with you now.

13          Good afternoon. My name is Julia Barton with the  
14 Organic Farmers Association, and I'd like to share comments  
15 today on three topics.

16          First, crop insurance. OFA appreciates the board's  
17 work on this important topic. OFA farmer members have a wide  
18 range of experiences with crop insurance and are eager to make  
19 crop insurance work better for organic farmers.

20          A few points we want to highlight here include  
21 farmers need a way to manage risk due to genetic and pesticide  
22 drift contamination. If these situations could be recognized  
23 as a qualifying event for crop insurance, farmers suffering  
24 from loss wouldn't be required to identify a source, which  
25 isn't always possible. More support from USDA to protect

1 farmers from these types of contamination and to deter the  
2 practice of drift is necessary.

3 Secondly, OFA has identified the need for risk  
4 management within the organic dairy industry.

5 For the past year, OFA has facilitated a national  
6 organic dairy farmer working group to identify farmer-driven  
7 solutions to the national organic dairy economic crisis. This  
8 farmer-led group has identified a strong need for the creation  
9 of a safety net program specifically for organic dairy based on  
10 organic specific milk and input cost data.

11 Also, OFA asks that USDA's National Organic Program  
12 increase enforcement of the organic standards, including access  
13 to pasture requirements and the updated origin of livestock  
14 rules to ensure that all organic dairy farmers are following  
15 the same rules so that farmers are operating on an equal  
16 playing field.

17 Next, residue testing. OFA agrees with the board  
18 that residue testing is an important tool for fraud prevention;  
19 however, organic is a process based standard as we've heard  
20 others note and so testing for residue must not be the standard  
21 for proving organic practices.

22 Here we'd also like to mention that OFA supports  
23 efforts by state and federal agencies to help farms cope with  
24 contamination of soil and water by PFOS chemicals, including  
25 assistance with soil and water testing, technical assistance

1 for determining whether farm operations can safely continue,  
2 and compensation for lost production and lost farm value due --  
3 due to contamination. MOFGA has provided outstanding guidance  
4 and support to the farmer community in this arena. We know  
5 that PFOS contamination exists across the country and urge the  
6 NOSB and NOP to get ahead of the problem with more proactive  
7 strategies and support for farmers dealing with contamination.

8           And finally, oral comments. OFA members would like  
9 to see the board return to allowing public stakeholders to give  
10 comments in person at NOSB meetings, starting with the  
11 Milwaukee NOSB meeting.

12           The point of moving the meetings was to get -- give  
13 each region an opportunity to speak directly to the NOSB back  
14 in the day when that practice began. While the online  
15 testimony is important, and we want you to please continue that  
16 mode of communication, OFA farmers also see value in in person  
17 testimony. In short, we need both.

18           Thank you for the opportunity to comment and for your  
19 service.

20           CHAIR POWELL-PALM: Thank you for your comments. Amy  
21 has a question for you.

22           SECRETARY BRUCH: Hi, Julia. Thank you for making it  
23 work and participating in our oral comment process, while  
24 you're -- while you're sitting in the cell phone lot at the  
25 airport.

1           I wanted to ask about crop insurance. There --  
2 there's been some comments about plant dates and that organic  
3 farmers are interested in RMA extending plant dates,  
4 specifically. I wanted to know; do you think this is a  
5 regional concern? Or do you think it's a nationwide concern by  
6 all organic farmers on the plant date?

7           MS. BARTON: That's a great question. I -- I imagine  
8 that planting dates requirements would have regional variation  
9 and therefore farmers who have noted that it's a problem for  
10 them have asked for kind of a -- a broader window so that they  
11 can essentially do more management -- thought management to  
12 determine when planting makes the most sense for their organic  
13 crops.

14           We've also had organic farmers note in the past that  
15 the -- the delayed planting date that they used the year before  
16 is already factored into their risk management calculations  
17 because they were already -- it's already part of the annual  
18 production history, if that makes sense.

19           SECRETARY BRUCH: Um-hum.

20           MS. BARTON: So --

21           SECRETARY BRUCH: Yeah.

22           MS. BARTON: -- we're essentially double-penalizing  
23 them. So, I think if -- if we were to check in -- I mean, I  
24 imagine there is regional variation in terms of when people  
25 want to plant, but I think if we were to check in nationally we



1 would find that what farmers want to be able to do is to do  
2 more of the thought management of the systems management that's  
3 required of them and have more flexibility to be accountable to  
4 that, rather than like a one-size-fits-all plug-and-chug model,  
5 which is what they're held to currently.

6           SECRETARY BRUCH: Um-hum. Yeah, that sounds good.  
7 If -- if you don't mind, on that particular question, the --  
8 the farmer folks that have commented to you and your  
9 organization, if we could kind of get just a location area that  
10 would be helpful, for my opinion, just to make sure it's --  
11 it's not an -- just to understand if it's national or regional.

12           MS. BARTON: You know, we can work on that, Amy. And  
13 I'll just take this opportunity to note that we will be working  
14 on that this winter with OFA farmers in kind of a -- a work  
15 group format. So, we'll circle back with you on that.

16           SECRETARY BRUCH: Okay, perfect. Thanks, Julia.

17           CHAIR POWELL-PALM: Thank you, Julia.

18           Next up, we have Harold Austin, followed by Tracey  
19 Dion, and then Rafael Clemente.

20           Harold, the floor is yours.

21           MR. AUSTIN: Okay. Did we get unmuted okay?

22           CHAIR POWELL-PALM: Loud and clear.

23           MR. AUSTIN: All right. Thanks Nate. Thanks  
24 everybody on the NOSB. My name is Harold Austin. I am a  
25 former member of the NOSB, as well as a lifelong member of the

1 Tree Fruit Association and industry here in the Pacific  
2 Northwest.

3 I'd like to thank you for the opportunity, not only  
4 to present my comments here this morning, but also to thank you  
5 for your service on behalf of the organic community and all of  
6 the organic stakeholders that comprise it. Thank you guys for  
7 all that you're doing for us.

8 Please refer to my written comments that I've already  
9 submitted, as well as those of the Northwest Hort Council, for  
10 a more detailed list of our comments provided.

11 For handling, I support the continued listing of  
12 phosphoric acid, nitrogen, and ethylene. For crops, I would  
13 like to take and -- froze up here -- I would like to voice my  
14 support for the continued listing of the two alcohols currently  
15 under review, the plastic mulches and covers, liquid fish  
16 products, ethylene, elemental sulfur, lime sulfur, sulfurous  
17 acid on-farm generated.

18 As I mentioned in my written comments, and comments  
19 before, I can't stress enough the importance of lime sulfur in  
20 our organic tree fruit production. I do not support, as the  
21 crop subcommittee mentions in their document, the request for a  
22 work agenda item to establish an annotation for regulating the  
23 rates and timings of the use of lime sulfur in organic crop  
24 production. I've worked with this material for more than 40  
25 years and have firsthand experience with its impact on our

1 beneficials, which I might point out is something that we work  
2 very hard and go out of our way to protect because it's our  
3 first line of defense in our farms against our -- the -- the  
4 invasive insects.

5           We might see a slight knockdown after an application  
6 but nothing that is not completely recovered within a very  
7 short period of time. In fact, that -- I'll point out the fact  
8 that our -- all of our bee colonies, our hives are out there in  
9 the field when we make our applications, and our beekeepers are  
10 very well aware of this and they're quite comfortable with us  
11 leaving them there.

12           Regulating the timings and the rates is the job of  
13 the EPA, and the label data packs that they receive; not that  
14 of the NOSB. You don't know the materials and how we use them,  
15 the rates, the timings, nor the thought process that goes into  
16 each application before -- and decision before we make an  
17 application. Please, let the EPA do their job.

18           Also, in your subcommittee notes, and I do read those  
19 by the way, you raised concerns regarding on-farm sulfurous  
20 acid production. To reiterate previous comments, we treat the  
21 water via the use of onsite sulfur burners to both lower the pH  
22 of the water and ultimately that of the soil, and also to help  
23 remove the calcium carbonate particles from our fruit finish,  
24 as well as interfering with the capability of the leaves for  
25 photosynthesis. This is a safe product, and the only true

1 alternative would be to use actual sulfurous acid and inject it  
2 into our water systems, and we really don't want to go there.

3 I would also like to express the hope that a path  
4 forward on the inert ingredients will emerge in the near  
5 future. I would like to urge caution as you forge ahead so  
6 that there's not a disruption in the allowed use for other  
7 various materials that our crop production currently rely on.  
8 I have the utmost confidence that a solution will be figured  
9 out.

10 Thank you for all that you do for us.

11 CHAIR POWELL-PALM: Thank you for your comments.

12 Any questions for Harold?

13 (No response.)

14 CHAIR POWELL-PALM: All right, we appreciate it  
15 Harold. Oh, actually sorry; Logan, please go ahead.

16 BD. MEM. PETREY: I -- yeah, I was going to see how  
17 many comments because this actually not pertains [sic] to  
18 anything currently on the list, but just the -- about the --  
19 changing the pH in the water, because we were reviewing this --  
20 the carbon dioxide, you know, for the irrigation use and didn't  
21 know if you ever had an interest in using that product instead  
22 of sulfur burners? Or, you know, looking for alternatives in  
23 that way?

24 MR. AUSTIN: You know, we -- we use the sulfur  
25 burners both -- you know, we're -- majority of our crop

1 production is organic and there -- we've got a little bit  
2 that's still conventional, but we've used the sulfur burners  
3 onsite so long we've really got a lot of confidence in the  
4 capability of it. It's a safe -- it's a safe application use  
5 of 99 percent pure sulfur, and -- and our workforce are  
6 comfortable with it. I mean, they -- they know how to use it  
7 safely. They know how to -- you know, and we see the benefits  
8 of it. It's probably the most effective material we've seen  
9 for keeping the calcium carbonate off, you know, because this  
10 is more than just our lines, it's also about getting the  
11 calcium carbonate off of our fruit because in the -- here in  
12 the Pacific Northwest, we have a lot of high count -- calcium  
13 levels, and so if - if we don't treat for it, because we -- we  
14 have to cool our fruit to keep it overhead, to keep it from  
15 getting burnt when we -- we get hot in the summer, so it's --  
16 that's really one of the main functions that we're doing, is to  
17 keep the fruit from sunburning. But then the additional impact  
18 is we're reducing the pH of the water, which starts out as  
19 around 8.4, 8.5, and we're getting that down into the -- the  
20 low 7.2, sometimes maybe a little bit lower, so we're -- we're  
21 getting, you know, lower pH water. We're -- it's -- and it's  
22 helping with the penetration of everything else that we're  
23 using.

24           There's so many benefits of using the -- the sulfur  
25 burners in this application that it's not just a, you know, not

1 narrow focus, but it's -- it's a pretty wide scope of the  
2 benefits that we see in our organic crop production.

3 BD. MEM. PETREY: Thank you.

4 MR. AUSTIN: You're welcome.

5 CHAIR POWELL-PALM: Jerry, please go ahead.

6 BD. MEM. D'AMORE: Thank you.

7 Hey, hello, Austin -- Harold. How are you?

8 MR. AUSTIN: I'm good. Yourself?

9 BD. MEM. D'AMORE: Good. Appreciate that. Were I to  
10 characterize what I find to be the most consistent criticism of  
11 the sulfurous acid, it would be that it can be used to mask  
12 poor soil conditions and/or practices. Could you respond to  
13 that?

14 MR. AUSTIN: Yeah. I -- we're working with poor  
15 soil. I mean, we're -- we're doing everything organically  
16 possible to increase our organic matter. We're dealing -- but,  
17 you know, the -- our -- our biggest problem is it's not the  
18 soil itself, but it's the irrigation water. The irrigation  
19 water is coming in. It'll start the season at 8.2. By the  
20 time we get to the end of the season, it's bounced up to about  
21 8.5. So, we're dealing with an extremely high pH water, you  
22 know, and we're -- we're talking not -- not just a couple  
23 acres; I mean this is that whole -- the whole geographic area  
24 out in the Columbia Basin. So, it it's not really poor soil,  
25 it's poor -- it's soil that's being impacted by the -- the pH

1 of the water that we're putting on it. So, it's not masking  
2 anything, it's -- it's quite an improvement to the soil  
3 conditions and to the -- the soil beneficials that we find when  
4 we -- we start looking around. So, it's --

5           You know, now I, you know, maybe there's areas but  
6 for our, you know, the areas that we work with, and I used to  
7 get a crop consultant, and I work with a lot of growers, you  
8 know, and a lot -- and thousands of acres, and it's -- it's  
9 beneficial to our -- our organic crop production. As well as  
10 conventional crop production, they also use it because of the  
11 safety of the process.

12           BD. MEM. D'AMORE: Thank you. Thank you for the  
13 answer.

14           MR. AUSTIN: You're very welcome.

15           CHAIR POWELL-PALM: Thank you, as usual, Harold, for  
16 your wonderfully considered questions and answers, and we look  
17 forward to seeing you in the meeting next week, I hope.

18           MR. AUSTIN: Thanks, Nate.

19           CHAIR POWELL-PALM: All right, next up we have Tracey  
20 Dion, followed by Raphael Clemente, and Kestrel Burcham. If  
21 Raphael is on the phone, please make yourself known in the  
22 chat. I don't think we're seeing you yet.

23 (No response.)

24           CHAIR POWELL-PALM: Tracey, welcome. The floor is  
25 yours.

1 MS. DION: Yes, thank you. Thank you.

2 My name is Tracy Dion, and I, along with my family,  
3 proudly raise certified organic lambs, cattle, oats, corn, and  
4 alfalfa in the heart of Terri, Montana. I'm here today to  
5 address the Honorable Chair of the National Organic Standards  
6 Board and all of its esteemed members. It's truly an honor to  
7 have this opportunity to speak my mind.

8 What makes this moment even more remarkable is the  
9 level playing field that the virtual platform provides. In  
10 today's NOSB world no monied organization can drown out the  
11 voices of hard-working individuals like me by paying to fly  
12 their people to give their comments in person. I really hope  
13 that the board keeps all public comments virtual in the future,  
14 ensuring equitable access to the board for all.

15 Ten years ago, my husband Jackson and I took over our  
16 farm from my parents. Back then, it was a little more than  
17 dirt having been farmed heavily for conventional sugar beets  
18 for about 60 years.

19 In 2017, we achieved certified organic status and  
20 since then our soil has undergone a miraculous transformation.  
21 We now have earthworms. We rotate nitrogen fixing crops that  
22 nourish the soil. We grow cover crops that lock carbon deep  
23 underground helping fight climate change. And we do it all  
24 without pesticides, antibiotics, GMOs, or herbicides. And  
25 after all that work we have buyers who will pay a premium for



1 our crops. That is the miracle of the organic seal. But if  
2 our operation is going to grow, and other farmers are going to  
3 transition to organic, we need help spreading the message about  
4 organic to consumers.

5 I raise some dang good tasting organic lamb on our  
6 farm. I don't use hormones or pour ons, and the manure from my  
7 livestock supports my crops. It's a great system and a great  
8 product, but the problem is I can't find a market for my lambs  
9 that cares about the organic status because of consumer  
10 confusion. I literally heard consumers ask does it even matter  
11 if it's organic?

12 Organic farming represents the only refuge in our  
13 food system against harmful pesticides and herbicides. It's  
14 the only federally enforced standard that guarantees all  
15 growers are producing to standards written in rule. Moreover,  
16 it's the most climate smart production system. It's high time  
17 we start singing the praises of organic from every rooftop.

18 I know most consumers would choose organic if they  
19 knew that every dollar they are buying clean food that's been  
20 inspected and that's better for the environment, but spreading  
21 this message to every American consumer is a big task. This is  
22 where we need the invaluable assistance of the USDA. I am so  
23 excited about the investments the USDA is making in the organic  
24 transition and -- Transition Initiative but we can't stop  
25 there; we need the USDA's agricultural marketing service to

1 take the lead in educating consumers about what the organic  
2 seal means from grocery store shelves to the school lunchrooms.  
3 I imagine one day seeing the memorable "Got Milk?" placed right  
4 next to a poster explaining the attributes of organic to school  
5 kids throughout the country. Thank you.

6 CHAIR POWELL-PALM: Thank you, Tracey. I so -- oh my  
7 gosh, I so appreciate you, and I think we all appreciate  
8 farmers. Thank you for taking the time and thank you for being  
9 able to make -- make it today. We have some questions for you.

10 First up, Kim. Please go ahead.

11 BD. MEM. HUSEMAN: Hi, Tracey. Thank you --

12 MS. DION: Hi.

13 BD. MEM. HUSEMAN: -- for joining us today. It's  
14 always good to hear from livestock producers, so I'm glad that  
15 you joined us, especially from the lamb front; I don't think we  
16 get -- we don't get that voice.

17 Can you expand on what your outlets are, I'll use the  
18 sensitive word of "harvesting" your animals? And what are your  
19 current practices; are you doing direct to consumer? Or what  
20 are the outlets that you have available today?

21 MS. DION: So, at this moment in time, there is a state  
22 inspected facility that's about 2-1/2 hours from me in Ekalaka,  
23 through the Montana Legacy Ranch. The -- the issue becomes  
24 finding the markets for organic lamb, and -- and when you sit  
25 down and do the math on it, it's a lot of work and you come

1 back to the same sort of profit margin, so I'm working on it.  
2 I guess. I -- you know, it's something that I would really  
3 like to pursue more. I think that there's an opportunity  
4 there, but at this point, you know, it's -- it's getting the  
5 value of organic -- of the organic label on to that lamb that  
6 is going to make all the difference.

7 BD. MEM. HUSEMAN: Okay, awesome. Thank you for your  
8 response and good luck.

9 MS. DION: Thank you.

10 BD. MEM. HUSEMAN: And then I'll send you my address  
11 because I'm interested in some of your products.

12 MS. DION: Perfect. Okay, thank you.

13 CHAIR POWELL-PALM: Allison, please go ahead.

14 BD. MEM. JOHNSON: Thank you.

15 Thanks so much, Tracey, for being here. Kim kind of  
16 asked my question, so I'll ask follow-up.

17 It sounds like you do have access to processing  
18 that's reasonably workable, but it's the -- the market that is  
19 a challenge, and I'm curious if you have a sense of whether  
20 your costs are higher and make your price point challenging?  
21 And the -- the flip side, if there are practices that you're  
22 like competition in the sector use that make it sort of  
23 impossible for you to compete? I'm thinking about sort of  
24 antitrust and competitive market issues that USDA is taking on  
25 separately from organic but that are really interrelated.

1 MS. DION: I don't know that I've gotten that far into, you  
2 know, antitrust issues. I think what I see, as far as  
3 competition goes, I see a lot of people that direct mark -- use  
4 direct marketing for their lamb and so, I'm not -- I'm not  
5 sure. I think I might have just forgot your long question, I'm  
6 so sorry.

7 BD. MEM. JOHNSON: I'll ask it more directly. I tend  
8 to go on.

9 Do you think that there are practices that you're  
10 competing against that are not captured in the consumer price,  
11 whereas your costs are? Or you're taking on working cost that  
12 your competition is not?

13 MS. DION: Well, I would say that anybody that's  
14 raising organic lambs has their hands absolutely full, and  
15 that's just the -- the amount of recordkeeping that goes into,  
16 you know, proving that something is organic, and sheep are not  
17 an easy market at all to deal with. So, you know, I think  
18 that -- that, you know, a higher price is definitely warranted  
19 for organic if someone's going to take on doing organic sheep  
20 production.

21 Did that answer your question?

22 BD. MEM. JOHNSON: Yeah, it's helpful.

23 MS. DION: Okay.

24 BD. MEM. JOHNSON: Thank you. I appreciate it.

25 CHAIR POWELL-PALM: I -- any other questions for

1 Tracey?

2 (No response.)

3 CHAIR POWELL-PALM: I have a question for you,  
4 Tracey.

5 MS. DION: Okay.

6 CHAIR POWELL-PALM: And thank you again for your  
7 comments.

8 We have a document on CACS for geolocating and trying  
9 to make consistent how farmers turn in the information  
10 describing their fields. Now -- and Montana's interesting  
11 because they put the legal description of every field right on  
12 the certificate, and I was wondering how do you feel about  
13 that?

14 MS. DION: I fully support that. And I would expect  
15 that on every organic certificate in the whole country.

16 CHAIR POWELL-PALM: Amen. Thank you. Well, we  
17 really appreciate your time today. Thank you.

18 MS. DION: Thank you. You guys are doing great work.  
19 Good job. Thank you very much.

20 CHAIR POWELL-PALM: Thank you so much.

21 Next up, we have Rafael Clemente; have we found him,  
22 Michelle?

23 MS. ARSENAULT: We have not, Nate.

24 CHAIR POWELL-PALM: Okay. We're going to jump to  
25 Kestrel Burcham, followed by Becky Weed, if she's on the call,

1 and then Casey Bailey.

2 So, Kestrel, please go ahead.

3 MS. BURCHAM: Hi. Hear me all right?

4 CHAIR POWELL-PALM: We can.

5 MS. BURCHAM: All right, thank you.

6 Good afternoon, everyone, and also the NOP. My name  
7 is Kestrel Burcham. I am the policy director for the  
8 Cornucopia Institute. I'm here to report on what Cornucopia  
9 has been hearing from organic consumers on important policy  
10 issues.

11 First and foremost, consumers are worried and  
12 confused about the lack of consistency in the organic  
13 marketplace. This lack of consistency leads to consumers  
14 questioning organic integrity as a whole. The specific areas  
15 this arises in most often include livestock animal centers and  
16 hydroponics. We hope that the organic livestock and production  
17 centers rulemaking will be finalized in -- soon. We believe  
18 this will cure a lot of the consumer confusion and lacking  
19 consistency in the organic livestock products, including eggs,  
20 poultry, and dairy, in particular.

21 We do get questions from consumers about organic pork  
22 pretty frequently, as well, and we would like to see standards  
23 developed specifically for pork someday.

24 Many consumers also see a distinct lack of  
25 consistency in organics because hydroponic production is

1 allowed. The more educated a consumer is about the issues, the  
2 more concern they have for hydroponics, in general. The chief  
3 complaint we hear is that they understand organic produce is  
4 soil grown. When eaters hear "organic hydroponic production,"  
5 anything grown in soil -- without soil till the plant is  
6 harvested, exists and is growing in the marketplace, it calls  
7 into question their trust in the entire label. Cornucopia  
8 understands these consumers' concerns from a policy  
9 perspective. Organic hydroponics exists in a regulatory  
10 vacuum.

11           From a legal standpoint, this is a precarious  
12 position to be in when the market relies on market distinction  
13 and transparency to exist. The NOSB has worked so hard to make  
14 multiple recommendations over the years concerning greenhouse  
15 and container production. This NOSB work was enriched by many  
16 years of deliberations, discussions, and efforts of public  
17 commenters; the NOP has thus far not enacted any of these  
18 recommendations.

19           Consumer trust in the organic label, and they pay for  
20 an extra assurance that it provides a more healthful and  
21 environmentally friendly way of producing food, they also  
22 choose organic because it provides more benefits to -- to  
23 communities, including enhanced ecosystem services.  
24 Hydroponics does not improve ecosystem services and does not  
25 offer these same benefits. Despite the USDA's policy that the

1 organic label is just a marketing term, the organic community  
2 is dedicated, and consumers know better. Research continues to  
3 back up the environmental and health benefits of organic food  
4 over conventional food. Hydroponics turns a lot of these  
5 benefits on its head. Just one reason consumers are concerned.

6 Cornucopia does not believe this issue is settled.  
7 As it stands, the standards are not consistent. Maintaining  
8 consistencies is one of the main edicts of OFA. We urge the  
9 NOP, NOSB, and other stakeholders to review their organic  
10 agriculture soil-based position statement, which lays out these  
11 issues meticulously. To expand the organic marketplace, we  
12 need to improve integrity and transparency throughout the  
13 agricultural system. The whole organic system must commit to  
14 continuous improvement. We need the organic label to stand for  
15 true conservation agriculture, as an example for how all  
16 farming should be.

17 Thank you so much, and good luck on your  
18 deliberations.

19 CHAIR POWELL-PALM: Thank you so much for your  
20 comments.

21 Amy, please go ahead.

22 SECRETARY BRUCH: Hey, thank you.

23 Kestrel, thank you so much for participating in our  
24 process, and the written comments you also provided.

25 I wanted to refer to your written comments and just



1 ask you a question, and this could be a follow-up that -- that  
2 perhaps you might need to do, so no worries on that. You  
3 mentioned for residue testing for a global supply chain that  
4 you really wanted to see testing conducted in two points -- two  
5 places; both at the point of origin and then upon arrival for  
6 bulk containers.

7 I just had a question; do -- are you aware of any  
8 innovation that's happening in testing to, I guess on the rapid  
9 analysis front because sometimes there is a delay when testing  
10 is conducted ,it can take four or five days, and that's a lot  
11 of time when -- when ships might release their content, so in  
12 the private sector are you aware of any rapid analysis testing  
13 that's -- that's being conducted?

14 MS. BURCHAM: I do believe there are some new  
15 technologies for rapid testing. My other policy staff member  
16 probably could give you more specifics on what those actual  
17 tests would be, but this is an area that seems to be expanding  
18 pretty rapidly, especially with SOE coming on.

19 SECRETARY BRUCH: Um-hum.

20 MS. BURCHAM: And I think it will keep expanding.  
21 So, yes, and I can get you more details, if needed.

22 SECRETARY BRUCH: Perfect. I would love the follow-  
23 up. Thank you so much.

24 CHAIR POWELL-PALM: Any other questions for Kestrel?  
25 (No response.)

1           CHAIR POWELL-PALM: Because we don't see the next two  
2 commenters, I'm going to have a question for you, Kestral, real  
3 quick, and that is; is there a way in our communication -- we  
4 just heard from Tracey, the farmer in Montana, how we need to  
5 be shouting from the rooftops, in her words, the benefits of  
6 organic, building that consumer demand so we create more of a  
7 market. Is there a way, in your estimation, that we can  
8 celebrate all that is good, say that 90-plus percent of all the  
9 different crops that are grown using conservation practices in  
10 the soil, while still not losing sight of the points of  
11 improvement? How -- can we do both?

12           MS. BURCHAM: Yeah, I would hope we can do both.  
13 I'm -- I'm someone who sees that there's no like black and  
14 white here, it's all shades of gray, and consumers do like to  
15 see it in black and white, and that's the constant struggle we  
16 have.

17           CHAIR POWELL-PALM: Um-hum.

18           MS. BURCHAM: For ,me I think for the end of  
19 celebrating what is good, we need to focus on the fact-based,  
20 science-based information we have coming out of research that  
21 shows the benefits of organic, both on the nutrition end  
22 because consumers really care about nutrition, on the  
23 environmental end, and the -- ends all of these, there's so  
24 much research coming out and continuing to come out that is  
25 just not accessible to consumers, and I think the USDA and

1 stakeholders like ourselves, and the,, NOSB as well could help  
2 break that down into more, you know, bite sized ways that  
3 consumers can access that more heavy science. I think that's  
4 one of the big hurdles.

5           And as far as the continuous improvement aspect, I  
6 think that is a challenge because consumers lose faith whenever  
7 we say, oh, well their organic is great but it has these  
8 problems. And I think we just need to make it clear that there  
9 are tools built into the system to have this continuous  
10 improvement, and any system is going to have issues. The world  
11 is messy. Food production is messy. And we need to -- like  
12 because like we said, celebrate the good while moving forward  
13 continuously. And maintaining those systems of continuous  
14 improvement are essential because otherwise you lose that  
15 integrity. As long as you can say, hey, we've got these  
16 systems in place to improve and we're trying to do that, I  
17 think that really comforts consumers. As soon as you lose that  
18 continuous improvement, though, you lose a lot of that.

19           CHAIR POWELL-PALM: I so appreciate that. We have  
20 another question for you from Jerry.

21           Jerry, please go ahead.

22           BD. MEM. D'AMORE: (No audible response.)

23           CHAIR POWELL-PALM: Oh, Jerry, I think you're muted.

24           BD. MEM. D'AMORE: Thank you, Nate.

25           I'm -- I'm very glad you got your -- your extra

1 minute or so because I really appreciate the way you ended  
2 the -- your -- your thoughts on how one might cooperate and,  
3 you know, acknowledging that things are gray, and can be gray.

4 I think the only thing that I would add in support of  
5 how do we do it without being disruptive, in other words, how  
6 do we find consensus, how do we engage in continuous  
7 improvement, would be to say that I find that unfortunately as  
8 we go about staking out our opposing positions, that we become  
9 home worst enemies. I don't think anybody makes the -- the  
10 organic consumer more confused than we ourselves. So, thanks.

11 MS. BURCHAM: Yeah, thanks, Jerry. I agree.

12 CHAIR POWELL-PALM: Well, if you -- I would -- I  
13 would say, if you have any great one-liners for why organic or  
14 what organic, Kestrel, that you want to shoot over to Michelle,  
15 we would be eager to see them.

16 MS. BURCHAM: Oh, I can definitely do that.

17 CHAIR POWELL-PALM: All right, thank you so much for  
18 your comments today.

19 We're going to jump now to Joseph Brinkley, followed  
20 by Abby Youngblood, and then Scott Rice.

21 Joseph, if you're there, the floor is yours.

22 MR. BRINKLEY: Hello. Can you see me? Hear me?

23 CHAIR POWELL-PALM: We can. Please go ahead.

24 MR. BRINKLEY: All right. Thank you so much.

25 My name is Joseph Brinkley. I'm the director of

1 Regenerative Organic Development at Bonterra Organic Estates.  
2 We're based in Mendocino County, California. I'd like to start  
3 by thanking the board for the important work they do, and for  
4 taking the time to listen to me and my fellow commenters.

5 I'm speaking to you today in support of maintaining  
6 sulfur dioxide on the list of allowable materials for wine  
7 making in the "Made with Organic" category. We at Bonterra  
8 Organic Estates find the use of sulfur dioxide critical to our  
9 business. We currently sell upwards of half a million cases of  
10 wine domestically and internationally; a volume that has  
11 doubled in the last handful of years. We have seen incredible  
12 interest and growth in our wines from consumers at home and  
13 abroad as the interest in organics continues to grow.

14 The use of SO<sub>2</sub> is indispensable for the consistent  
15 high-quality wines that we are known to produce. SO<sub>2</sub> acts as  
16 both -- SO<sub>2</sub> being sulfur dioxide -- acts as both a sterilant  
17 and an antioxidant serving two critical needs in the wine  
18 making process. Furthermore, to date, there are no viable  
19 alternatives to these two crucial needs served by this very  
20 important material.

21 We pride ourselves on selling high-quality wines at  
22 an approachable price point made available to people all over  
23 the country and in many parts of the world. Without the  
24 limited use of SO<sub>2</sub>, this would not be possible. We maintain  
25 our usage of SO<sub>2</sub> at or below the minimum allowable amounts per

1 the NOP guidelines for wines made with organic grapes.

2 Removing this material would be devastating to our brand and  
3 our business.

4 For sterilant purposes, while a limited number of  
5 materials are available for antimicrobial capabilities in wine,  
6 they are limited in scope, less effective than SO<sub>2</sub>, and all are  
7 synthetic, so none of these can be used in our production.

8 Physical alternatives, such as microfiltration can be effective  
9 in removing unwanted microbes and are, in fact, used from time-  
10 to-time in situations where unwanted microbe blooms occur, but  
11 regular filtrations of all wines for microbial control is both  
12 impractical and also damaging to quality. The filtration  
13 process always exposes wines to oxygen, which has its own  
14 damaging effects, and many wine makers consider filtration a  
15 harsh process that can both add unwanted flavors to the wines,  
16 and strip out desired ones.

17 As an antioxidant, there are no alternatives for SO<sub>2</sub>.  
18 In fact, wines are so susceptible to damage from oxygen  
19 exposure, wine makers already take great pains throughout the  
20 wine making process to limit this exposure. Our organic  
21 handling would be critically impacted if the use of SO<sub>2</sub> was no  
22 longer allowed.

23 Wines of good commercial quality and longevity that  
24 today's consumers demand are not possible without SO<sub>2</sub>. This is  
25 clearly evidenced by both the fact that every winery, except

1 those desiring to claim organic status, in the U.S. and a few  
2 "natural" wine makers, use it in their winemaking and the fact  
3 that other countries allow it for use in organic wine making at  
4 conventional rates, as they recognize how critical it is in  
5 making quality commercial wines.

6 Our ask is that NOSB vote to relist sulfur dioxide  
7 into the future for wine made with organic grapes. Thanks

8 CHAIR POWELL-PALM: Thank you so much for your  
9 comments. We have a couple of questions for you, starting with  
10 Logan.

11 BD. MEM. PETREY: Hi. Thanks for coming.

12 MR. BRINKLEY: Hi.

13 BD. MEM. PETREY: Well, a question about a previous  
14 comment from our commenter today, and he was talking about in  
15 the flavors category that ethyl acetate; are you -- are you  
16 familiar with that? And are you able to source it, you know,  
17 organically so that that -- you know, there was an uptake in  
18 that product availability. And I didn't know if you had any  
19 comment on that.

20 MR. BRINKLEY: Yes. No, we -- we don't really  
21 necessarily need that. The -- the magic of wines is that  
22 they're kind of all-inclusive, minus a couple little adds, so  
23 yeah, the -- the fermentation with the sugar basically gets us  
24 to where we need on the alcohol side.

25 BD. MEM. PETREY: Great, thanks.

1 MR. BRINKLEY: Thank you.

2 CHAIR POWELL-PALM: Allison, please go ahead.

3 Followed by Nate.

4 BD. MEM. JOHNSON: Thanks for being here, Joseph. We  
5 didn't have a lot of comments on this SO2 in the spring, so I'm  
6 really happy to see some wine producers showing up this time  
7 around.

8 And I'm curious if you have any comments on how the  
9 Made with Organic annotation has impacted Bonterra, and in your  
10 view the growth of organic grape beverage?

11 MR. BRINKLEY: Yeah, that's a great question. Thank  
12 you for that. How Much time do we have?

13 BD. MEM. JOHNSON: Five years. Let's go.

14 MR. BRINKLEY: We -- we've certainly -- so, I would  
15 say one of the limiting factors on the commercial expansion is  
16 the lack of consumer awareness, so we certainly find that  
17 there's a bit of confusion around the wine sector, specifically  
18 in the organic wine versus Made with Organic Grapes category.

19 We've worked quite diligently, I'd say, and over many  
20 years now Bonterra's been a brand since the early 90's,  
21 organic, with organic grapes, so it -- it's been a bit of a --  
22 a challenge but we're -- we're still working in that direction.  
23 And I think, depending on the geography and demographic of the  
24 consumer, there's better or less understanding as far as those  
25 two different categories. It -- it certainly doesn't help that



1 we're the only nation essentially with the two categories.  
2 Anywhere else our wines are consumed they're called organic  
3 wine, but I -- I do think there's a few of us now in the game  
4 and we're -- we're still working on trying to clarify some of  
5 that confusion.

6 BD. MEM. JOHNSON: That's helpful. Thank you.

7 CHAIR POWELL-PALM: Nate, please go ahead.

8 BD. MEM. LEWIS: Do you have any opinions about the  
9 restrictions on sulfur dioxide, particularly as it is only  
10 limited to grape wine? And then also the -- the PPM  
11 restriction? I just want to get -- get all the issues on the  
12 table. I know you're a grape wine maker, but you may have  
13 other fruit wine makers that you could -- you've talked to  
14 about that, so the grape issue and then the 100/ppm issue.

15 MR. BRINKLEY: Great. Yeah, thanks for the question.  
16 Again, I -- I cannot speak to other fruit wines. Really not  
17 our focus and -- and I haven't spoken to many folks in -- in  
18 that realm.

19 As far as the ppm issue, I would advocate, continue  
20 to advocate for the levels to be maintained where they are.  
21 I -- I'd -- I'm not here to ask for any lowering of standard,  
22 but I do find that the limited use and the "Made with" with  
23 category is critical for us, to the point that I would say if  
24 it were removed, we would probably drop the cert, right. So,  
25 yeah. So, thanks.

1 CHAIR POWELL-PALM: All right, thank you so much,  
2 Joseph --

3 MR. BRINKLEY: Thank you.

4 CHAIR POWELL-PALM: -- for taking the time to share  
5 those comments with us today. We appreciate it.

6 Next up, we have Abby Youngblood, followed by Scott  
7 Rice, and then Stephanie Jerger.

8 Abby, if you're there, please go ahead.

9 MS. YOUNGBLOOD: Thank you, Nate.

10 Good afternoon. I'm Abby Youngblood, executive  
11 director at the National Organic Coalition, or NOC, and I want  
12 to talk about NOC's work with Congress, in person oral  
13 comments, and advancing racial equity in the USDA Transition to  
14 Organic Partnership Program.

15 We are in a tumultuous period in Congress right now  
16 with an unclear path forward for a new House Speaker, action to  
17 avert a government shutdown before the November 17th deadline,  
18 and renewal of the 2018 Farm Bill after it expired on September  
19 the 30th. I want to highlight two issues that pose a  
20 particular threat to the organic community.

21 First, the Cost Share Program is especially  
22 vulnerable in an environment where Congress decides to extend  
23 the current Farm Bill. In the absence of a special provision,  
24 the Cost Share Program will expire leaving thousands of organic  
25 farmers with a huge net increase in their annual certification

1 costs.

2           Second, amendments to agriculture appropriations  
3 legislation have been introduced in both the House and the  
4 Senate that would block forward movement on the organic  
5 livestock and poultry standards rule, so we'll need to fight in  
6 the coming weeks to both secure funding for the Cost Share  
7 Program and the Farm Bill extension, and to defend against  
8 these amendments to block the organic animal welfare rule from  
9 moving forward.

10           Together with my partners -- with many partners, NOC  
11 is also advancing seven marker bills with specific provisions  
12 related to Organic Farm Bill priorities: certification cost  
13 share; continued transition support; organic integrity and  
14 continuous improvement; organic research; seeds and breeds;  
15 organic dairy; conservation priorities; and addressing Black  
16 farmer land loss. We refer you to our detailed written  
17 comments for some additional information about these marker  
18 bills.

19           In person oral comments. We appreciate the  
20 discussion at the Atlanta board meeting and the comments today  
21 as well. We are strongly advocating that the board try in  
22 person oral comments for at least two meetings so that board  
23 members have a comparison to a meeting with only virtual  
24 comments. We ask the board to try in person oral comments at  
25 the Spring 2024 meeting in Milwaukee.

1           In closing, I want to thank the board for your work  
2 to build a more diverse, equitable, and inclusive organic  
3 movement. And I want to encourage us as an organic community  
4 to consider ways that we can leverage USDA's Transition to  
5 Organic Partnership Program, TOPP, in that effort and echoing  
6 something Ellie said earlier, NOC is also a participant in one  
7 of the national TOPP projects, and as part of that work organic  
8 organizations have a chance to participate in an eight month  
9 long racial equity learning cohort that's offered free of  
10 charge. We think this is an incredible opportunity and we hope  
11 folks will take advantage of that.

12           And thank you so much to the board for your service.

13           CHAIR POWELL-PALM: Allison, please go ahead.

14           BD. MEM. JOHNSON: Thanks Abby, both for your work  
15 here with the board, and at the federal level to protect cost  
16 share and try to grow resources more organic. We really need  
17 it.

18           Your last point about the -- the training that you've  
19 done on racial equity, I'd love to hear more about -- I know  
20 NOC has commented a number of times about how racial equity  
21 training could benefit board members, and we're looking at ways  
22 that we could integrate that into our PPM updates in the new  
23 year. So, I'm curious if you could just speak a little bit  
24 more to what your experience has been? And how you think we  
25 would best be able to bring that type of training to the board?

1 MS. YOUNGBLOOD: Thanks for the question, Allison.  
2 And the learning cohort that Ellie and I both mentioned in our  
3 comments is a very deep dive type of training opportunity, but  
4 I -- I wanted to flag it because many of our organizations are  
5 participating. The first cohort was for certifiers and  
6 inspectors. The second cohort that NOC is also part of is for  
7 education and advocacy groups. There's two more cohorts, so  
8 I -- you know, between these cohorts, I think there will be  
9 dozens of organic organizations that together are taking this  
10 deep dive through this eight-month long program, so I think  
11 that's a really exciting opportunity.

12 I think many organic organizations also have  
13 trainings that their staff do, kind of as part of the  
14 onboarding process, and I think something like that might be  
15 more applicable to the National Organic Standards Board work.  
16 And I think it might also be interesting to think about how to  
17 institutionalize the board's commitment to equity and  
18 inclusion, possibly through integrating it into some of the  
19 officer roles that the board has or thinking about how it's  
20 part of the onboarding process for new board members, so that  
21 there's kind of a shared understanding or maybe a shared  
22 baseline on the board.

23 And then lastly, I think the board has a really  
24 fantastic opportunity through the in-person meetings and  
25 through the speakers you invite to really continue building on

1 the conversation that's happening around equity and inclusion.

2 CHAIR POWELL-PALM: Amy, please go ahead, followed by  
3 Franklin.

4 SECRETARY BRUCH: Yeah, thanks Nate.

5 Abby, thanks for joining us today, and thanks for  
6 providing us with written comments and all the work you're  
7 doing on the Hill on behalf of organic producers.

8 I just had kind of a general question, and I'll  
9 probably be asking this to other members that represent us on  
10 the Hill, but in 2018, you know, one of the top priorities was  
11 oversight and enforcement, and we were so fortunate to get  
12 funding for this -- for the SOE and I'm excited for that to be  
13 in the fruition, finally.

14 I see though current Farm Bill priorities enforcement  
15 and oversight was absent. There wasn't that I know of, and  
16 correct me if I'm wrong, I don't see that as a top priority for  
17 an ask. And I know the ones that are on there are brilliant  
18 and wonderful, but I was just wondering where does that stack  
19 up, the oversight and enforcement and continuous improvement  
20 because, you know, we -- we just hear a lot of feedback from  
21 farmers that, you know, we need to do more. So, I was just  
22 kind of questioning where that's at in -- in your priorities?

23 MS. YOUNGBLOOD: Thank you for that question. In my  
24 mind, the biggest linkage is around authorization of additional  
25 funding for the National Organic Program and that the funding

1 for that program keep pace. That is a conversation we're  
2 having with members of Congress and we're hopeful that there is  
3 the opportunity to continue to increase the resources for the  
4 National Organic Program.

5 In the last five years, there has been, I think,  
6 tremendous capabilities added, and part of that is the  
7 additional resources going from nine million, I believe, that  
8 was 2017, up to more than 22 million each year for the National  
9 Organic Program. A lot of that has gone into accreditation of  
10 certifiers and enforcement activities, building capabilities  
11 with Customs and Border Protection, and building more tools and  
12 cross-agency collaboration to crack down.

13 So, I think that additional funding is important, but  
14 I'll just note that the actual funding level for the National  
15 Organic Program is determined through the annual appropriations  
16 legislation, so there's an authorization and then the money is  
17 appropriated annually. We have to keep fighting there, as  
18 well, to get additional increases. I think there are things  
19 that the administration, you know, has the ability to do and  
20 can continue to do without legislation. I think where we go to  
21 the Farm Bill is when we think we need that legislative tool to  
22 get our goals achieved, and I think if the board is seeing that  
23 we need that legislative tool in certain areas, I hope we can  
24 be in dialogue on that and figure out how to -- how to address  
25 that.

1           SECRETARY BRUCH: Okay. Thank you, Abby. Appreciate  
2 it.

3           CHAIR POWELL-PALM: Franklin, please go ahead.

4           BD. MEM. QUARCOO: Yes, sir.

5           Abby, I appreciate it if you can expand a little bit  
6 on the potential impact of the exploration of the Cost Share  
7 Program on the diversity of organic producers and their  
8 participation? And I'm talking about diversity in the broadest  
9 sense possible, especially those with limited resources, that  
10 that would be great.

11           MS. YOUNGBLOOD: Yeah. Thank you so much for that  
12 question. And we do know from the survey that the Organic  
13 Farming Research Foundation did, that cost is a barrier for  
14 many farmers in getting certified, and especially for  
15 operations that maybe are more remote to where the certifier or  
16 the inspector is located. There are certain regions of the  
17 country that are underrepresented in terms of certification  
18 agencies where costs might be higher. We also know that for  
19 some small-scale diversified operations and some operations  
20 that have maybe both crops and livestock, that Cost Share  
21 Program makes a huge difference.

22           We already have so many people in our movement who  
23 are using organic practices but are maybe not going through  
24 certification for good reasons, but taking the certification  
25 Cost Share Program away will exacerbate that problem of having



1 more people fall out of certification.

2 I know produce -- some producers that I've spoken  
3 with are frustrated because we've been on a roller coaster with  
4 the Cost Share Program, and so one of our biggest goals is to  
5 get some more stability for that program in the coming Farm  
6 Bill. An extension is very likely, so we'll be really working  
7 hard to get the Cost Share Program in that extension. It's not  
8 automatically assumed to be part of the extension, so it's  
9 an -- it's an extra lift to make sure we find money for it for  
10 2024.

11 CHAIR POWELL-PALM: Any other questions for Abby?  
12 (No response.)

13 CHAIR POWELL-PALM: All right, we appreciate your  
14 time Abby, thank you.

15 Next up, we have Scott Rice, followed by Stephanie  
16 Jerger, and the Phil LaRocca.

17 MR. RICE: Greetings everyone. Thank you for this  
18 opportunity to comment. My name is Scott Rice, and I am the  
19 regulatory director at the Organic Trade Association, a member-  
20 based organization representing nearly 10,000 organic  
21 businesses in North America from farmers to handlers, retailers  
22 to manufacturers. OTA's mission is to promote and protect  
23 organic with a unifying voice that serves and engages its  
24 diverse members from the farm to marketplace. I'm also a  
25 former NOSB member and appreciate firsthand the hard work you

1 all invest in this public process, so thanks for that.

2           OTA submitted written comments on several areas of  
3 the fall agenda, and today I'd like to highlight a few points  
4 we made.

5           First, we support CACS's inquiry into the expanding  
6 existing prohibited substance testing protocols to include  
7 targeted risk-based testing for substances known to be used on  
8 a particular commodity. We see this as a logical and sensible  
9 step forward in further protecting organic integrity. Using  
10 imported oil seeds aligns with that risk-based approach and we  
11 believe presents a good starting point.

12           In response to the CACS's question of what else  
13 should -- should the NOSB consider to strengthen residue  
14 sampling, we point to the need for consistency. Consistency is  
15 something that I feel like I'm always a broken record on, both  
16 when I was on the board, and now at OTA. If responses to  
17 positive presence are to be truly consistent, there must also  
18 be consistent testing methodologies across the labs used by  
19 certifiers. Consistent practices across sampling testing and  
20 response steps of the residue program will make for an even  
21 playing field and how it's applied and produce consistent data.  
22 And importantly I think that data can then be used to inform a  
23 targeted risk assessment and aid greater efficacy in fraud  
24 detection.

25           Sampling procedures and how to respond to positive

1 presence of residues is laid out via guidance in the NOP  
2 handbook; however, if the industry intends to increase reliance  
3 on testing as a tool for compliance, we encourage the NOP to  
4 update and highlight guidance to provide consistency on  
5 expectations and clear action plans in the event of residue  
6 detections.

7           In closing, we're here to represent the trade and  
8 organic business. We need tools such as these proposed here to  
9 confront, respond to, and stop fraud, to protect organic  
10 integrity and the seal. As part of any initiative, we need to  
11 be mindful that these efforts are targeted and effective and  
12 not simply performative. In the lead up to implementation of  
13 strengthening organic enforcement, businesses are already doing  
14 this through a development of fraud prevention plans, as  
15 required by the rule. Let's take this opportunity to  
16 incorporate data from a consistent testing program and over  
17 time inform those plans to effectively target our efforts.  
18 Thanks very much.

19           CHAIR POWELL-PALM: Thank you for your comments, and  
20 for your previous service.

21           Questions for Scott?

22 (No response.)

23           CHAIR POWELL-PALM: I have a question for you. Scott.

24           Oh, well go ahead, Nate, and then I'll follow with  
25 mine.

1           BD. MEM. LEWIS: Appreciate the input on the residue  
2 sampling. I was curious if you all had had any discussion  
3 around whether there needs to be updates to the regulation, in  
4 addition to the guidance. And I'm mainly asking to try to like  
5 triage where we focus our work because regulations are  
6 heavier -- are a heavier lift. But anyway, just thoughts about  
7 regulation versus guidance.

8           MR. RICE: Yeah. All -- always a tough one, I think.  
9 I would say having guidance codified in the regulation is  
10 always, I think, a best case, but as you know it's a hard lift.  
11 I -- I think we've got -- we've got solid guidance. I think  
12 it -- it's still just guidance. I think continued attention to  
13 the handbook where that lives, and I know that that also  
14 presents its difficulties in terms of updating that because  
15 that's sometimes seen as a regulatory action, so I -- I don't  
16 have a simple easy answer to your question. But I think the  
17 guidance still has its place. I think it's -- it's most  
18 important that the message get out to all certifiers that both  
19 domestic, international, that that is a -- as much a part of  
20 the regulation as the regulation itself so that we again drive  
21 that consistency and how it is applied.

22           CHAIR POWELL-PALM: Kim, please go ahead.

23           BD. MEM. HUSEMAN: Hi, Scott. Good to see you.

24           MR. RICE: Hi.

25           BD. MEM. HUSEMAN: On the note of consistency, we did

1 hear from another commenter a suggestion about bulk lab  
2 testing. So, when you speak about consistency in -- in the  
3 testing procedures, is that in the form of the -- the companies  
4 allowed to do the testing? Would there be a -- like a list of  
5 companies that are approved? Or is it as long as testing  
6 procedures can be validated as such, then you can use whatever  
7 test? How would you define that from a consistency standpoint?

8 MR. RICE: Yeah, I think it incorporates all of that.  
9 It -- it's from the way that those samples are collected, which  
10 I think certifiers are in a good place on, I think in terms of  
11 the labs we do have guidance from NOP that outlines sort of the  
12 minimum of -- of what is required for a lab to perform those --  
13 to conduct that sampling. I think there is still variation  
14 amongst the labs, there's variation in the list of what is  
15 sampled for.

16 I think one thing I didn't note in my oral comments,  
17 but we have in our written, is the-- the list of -- of  
18 substances that NOP has -- has in the handbook is fairly, I  
19 think, outdated and much smaller than what a lot of labs use  
20 right now, and what -- what I think should be referenced and  
21 used. So, I think it's consistency across all of those areas.

22 BD. MEM. HUSEMAN: Yeah, no thanks, Scott, because I  
23 do know, you know, working with labs in many different roles  
24 that I've had you'll have like -- you might have an internal  
25 result, and then you defer to a like a referee result, you

1 know, to -- how do you -- you know, that's -- I guess that's  
2 where my mind is a little gray at the moment, is how to define  
3 those parameters and then what would constitute that for --  
4 and -- and consistency is key for sure, so I appreciate your --  
5 your thoughts on it. Thank you.

6 CHAIR POWELL-PALM: All right, any other questions  
7 for Scott?

8 (No response.)

9 CHAIR POWELL-PALM: Scott, I'm going to put you in  
10 the same bucket as Elizabeth Bell now, as a former WSCA'er, and  
11 could you talk a little bit about the -- the burden and the  
12 benefit of having exact coordinates for certifiers of fields?  
13 You -- WSCA seems to do a fabulous job doing it, and it doesn't  
14 seem to be that big of a lift, so just wanted to get your take  
15 on it.

16 MR. RICE: Yeah, I guess I'd echo Liz's comments; I  
17 think with any new practice that you bring in with the team,  
18 it's got its headaches at the front end to get everybody on  
19 board in terms of just the technology and the practice and the  
20 consistency and how we're doing it. But I think once you get  
21 there, the -- the resource, the -- the data outweighs any of  
22 those initial kind of front-end heartburn. So, I -- I would  
23 say it's a -- it's a positive place to move toward.

24 CHAIR POWELL-PALM: Awesome. Appreciate your  
25 comments today.

1 MR. RICE: You bet. I'll see you next week.

2 CHAIR POWELL-PALM: All right, see you next week.

3 Next up, we have Stephanie Jerger, followed by Phil  
4 LaRocca, and then Margaret Scoles.

5 Stephanie, if you're there, please go ahead.

6 MS. JERGER: Hi. I am here. Thank you.

7 I am Stephanie Jerger. I'm the vice president of  
8 operations for the Organic Trade Association. We have  
9 submitted comments already for this topic, but I want to  
10 definitely talk about our diversity initiatives in regards to  
11 the transition and transitioning communities of colors and by  
12 Black farmers and growers.

13 Based on our experiences and feedback from our  
14 members, we decided a few years ago to make a more intentional  
15 push towards making sure that organic does not effectuate  
16 social inequities, so while we have these opportunities to  
17 embed equity into the process and policy, we want to make them  
18 fruitful.

19 The USDA has created a great opportunity in the  
20 Transition to Organic Partnership Program, and there's a great  
21 deal of opportunity in transitioning organic acreage in these  
22 communities that we're currently not reaching, but there are  
23 some barriers that I just want to highlight here.

24 First one is communication. It's a very obvious  
25 literal translation like linguistic translation. But not only

1 that, there's a cultural competent communication that appears  
2 to be lacking based on what we're hearing from our partners and  
3 the communities that we're talking to. Just plain language is  
4 already hard enough if it's not culturally competent, so having  
5 regulatory and technical language it makes it even harder for  
6 people to get past the hurdle of even understanding what the  
7 opportunity in organic is.

8           Also, the certification process, the paperwork, it is  
9 a barrier to people who are in these communities to be able to  
10 get past, and to even get started for what they need to do to  
11 try to become certified organic. It can be a deterrent in  
12 most -- in most cases.

13           Also, we want to better right size the expectations  
14 for the cost and the commitment of organic. It's not clear to  
15 these growers or these producers what is expected of them, and  
16 when they see it in the paperwork or in form or in a list, it  
17 can be very daunting.

18           Also, we want to highlight as a barrier the  
19 demystifying of our organic resources, the National List,  
20 what's allowed, synthetic versus non synthetic, allowable  
21 prohibited, calculation formations; those things are all things  
22 that are not innate if you're not in this community, and  
23 they're absolutely becoming barriers to people being able to  
24 actually finish the process.

25           And last, just the learning curve. They don't know



1 what they don't know; there needs to be some better holistic  
2 way to like co -- have a cohesive place for people to  
3 understand what the process may be, what's there, what is  
4 available to them, and where they can find things. And just  
5 growing the organic market to prepare small scale growers who  
6 will be entering in the supply chain from this program. If  
7 TOPP is wildly successful, which we hope it will be, without  
8 addressing these issues upfront we will have created another  
9 issue.

10           OTA is already working on, with -- partners all  
11 around the country, on these issues and we invite you all and  
12 go to our website and feel free to reach out to me directly.  
13 If you don't find something you need there, I'm happy to work  
14 with you all.

15           And in closing, on behalf of members and staff, thank  
16 you to Organic Standards Board for the opportunity to comment.

17           CHAIR POWELL-PALM: Well, thank you for your  
18 comments. We really appreciate them. Those are great.

19           Let's go to Logan and then Allison.

20           BD. MEM. PETREY: Hey, thank you.

21           I couldn't help but notice the Florida A&M  
22 University, and yeah, okay, so Florida girl.

23           Just curious, for some of those educational things  
24 you have like a nonprofit for organic growers in the state,  
25 didn't know if maybe that has become a resource? Or if that's

1 lacking some information? Or, you know, if things like that  
2 could be better? Some of those local, you know, outreach --  
3 educational outreach programs? I am very familiar with thought  
4 action on the board with it, so if there is a need there, you  
5 know, for those local outreach programs, do you think that that  
6 is a good way to get some of that information to farmers that  
7 they can have more workshops, things like that? What -- what  
8 is your idea of -- of getting that to people?

9 MS. JERGER: Absolutely, Logan. Thank you for that.  
10 I do think that having more information that's coming down from  
11 the USDA, or what we understand is organic, be better trickled  
12 into those community organizations would be more helpful. The  
13 communities already trust those organizations. They have an  
14 outreach that is already structured to be able to reach them in  
15 a way that they know works. But the information that we're  
16 putting out is not getting down to -- to those communities, so  
17 I would absolutely say maybe better educate and partner with  
18 more local entities, some, you know, community anchored  
19 organizations because they will be better to translate the  
20 information out, but they have to be better educated themselves  
21 on what organic is, what it does, the process, how it comes  
22 through. So yeah, I think that would be a great place to  
23 start.

24 BD. MEM. PETREY: Thank you.

25 MS. JERGER: Um-hum.

1 CHAIR POWELL-PALM: Allison, please go ahead.

2 BD. MEM. JOHNSON: Thanks so much for being here,  
3 Stephanie. I really appreciate your comments, and the barriers  
4 that you named are the same things that I'm hearing coming up  
5 as I'm doing outreach on organic transition. And I'm curious  
6 if you could speak a little bit to what you see you working so  
7 far in the early stages of TOPP on how are people successfully  
8 overcoming these barriers? And especially you mentioned  
9 cultural competency is like a hard thing to teach, so if you  
10 see anything that has been particularly effective in that area?

11 MS. JERGER: Absolutely, Allison. Thank you. One of  
12 the things that I clearly see as being helpful is more  
13 handholding, unfortunately, and I know no one has that much  
14 time, but unfortunately at OTA, I do. I put on a webinar once  
15 a month called "Ask Me Anything," where I bring in consultants,  
16 I bring in certifiers, I bring in people to just come to the  
17 people who are in my program and answer their questions. These  
18 are questions that they cannot look up. They're never going to  
19 find the answer to. There's no one that's going to answer this  
20 question. And then once they get into a certification process,  
21 it's absolutely not going to happen. So, that's what I found  
22 successful. And OTA's program, we -- we're two years in  
23 existence. We have seven people right now actively in  
24 transition and we've been able to get one person actually  
25 certified through this process.

1 CHAIR POWELL-PALM: Fantastic. Franklin is up next.

2 BD. MEM. QUARCOO: Hello, Stephanie. Can you --

3 MS. JERGER: Hello.

4 BD. MEM. QUARCOO: -- provide examples of the kind of  
5 language that puts people in a type of community off, their  
6 interest wains when people begin to use that kind of language,  
7 language that maybe sometimes for the person talking may sound  
8 like this is -- this is everyday language; can you give an  
9 example of the kind of language that can put type of farmers  
10 off --

11 MS. JERGER: I can. I can, Franklin. Thank you.  
12 There are two words that I have to stop myself and explain or  
13 redirect every time I say them, and that is "regulatory" and  
14 "compliance." We use a lot of technical language in this  
15 community, and it is not used outside of this community. And  
16 not only is it not used as often, those words mean different  
17 things in these communities we're trying to penetrate, so they  
18 are terrifying to them. They will stop talking to me  
19 immediately so, I'm constantly redirecting that, but that's a  
20 part of like cultural competent communication. I have to be  
21 able to communicate to my audience. Technical language is all  
22 fine for understanding the rules, but they're not going to be  
23 able to understand them if they can't get past the literal  
24 words. So, those are two very, you know, two very alarming  
25 words but I think there are several words like that, and I

1 think that we don't think about that because we're just writing  
2 technical language, we're just writing regulation, but those  
3 things do not translate well for the communities we're trying  
4 to reach.

5 CHAIR POWELL-PALM: Other questions for Stephanie?  
6 (No response.)

7 CHAIR POWELL-PALM: I just have a -- a little  
8 question for you, Stephanie. When we talk about handholding, I  
9 think that is just such a good way to put it, that farmers  
10 should be responsible for farming. The idea of having to have  
11 this, you know, deep regulatory knowledge to be able to be an  
12 organic farmer seems like an unnecessary burden. When I think  
13 about going into the FSA office, I get my hand held for how to  
14 fill out my proper boarding, how to access my crop insurance; I  
15 mean, they sit there, and they'll do that with every single  
16 farmer in my county. So, I don't know if you have any ideas  
17 for how we can just kind of like pass that process along and  
18 sort of replicate the USDA models we already have for making it  
19 so that you have a place to go to ask these questions and get  
20 your hand held?

21 MS. JERGER: Nate, I'm so glad that you asked that  
22 question. That's -- that's exactly the -- the experience that  
23 they're not having sometimes in these places. Having an FSA  
24 office that can translate and understand and represent truly  
25 what the USDA has sent down to it, is -- it's excellent, but it

1 does not always happen. And a lot of the communities I'm  
2 dealing with, they're rural, a lot of them are southern, in the  
3 southeast, and when they go into an organic -- you know, the  
4 office, I'm sorry, FSA office and mention that they're doing  
5 something in organic, just like glazed over. A lot of them  
6 will tell me they're not getting a response, they have no idea  
7 what they're talking about, they don't know what that form is,  
8 that doesn't exist; they don't know that language. They  
9 don't -- they're not competent in a lot of those offices  
10 because organic is not as deeply embedded in these communities  
11 where we're trying to embed it. So, I think we have to  
12 acknowledge first that in places where there is not a hot spot  
13 of organic, we need to be creating more education at the  
14 federal level, at the less local level for those agencies  
15 because that's where they're going to help, and they're being  
16 turned away, and again it's a deterrent for them.

17 CHAIR POWELL-PALM: And so, sorry, just to clarify,  
18 would you say resources best deployed to go to those county  
19 level offices and try to put on organic trainings? Or would  
20 you say higher up is better use of our time right now?

21 MS. JERGER: I would say resources in those places  
22 would be better used than higher up because the people who are  
23 in Tuscaloosa, Alabama are not going to get to D.C. to see how  
24 wonderful it is to walk ain the Independence Avenue office.

25 CHAIR POWELL-PALM: I'm hearing a thread here with a

1 little of "What is organic?" Give that education.

2 So, let's jump to Kyla real quick. Kyla, please go  
3 ahead.

4 BD. MEM. SMITH: Hi, Stephanie. Thanks for your  
5 comments.

6 So, I say "regulatory" and "compliance" about 1,000  
7 times every day, so I know you said that OTA has a bunch of  
8 resources; is a lexicon of like better words one of those  
9 resources?

10 MS. JERGER: It is not yet, but it is coming, Kyla,  
11 as a part of our Diversity Resource Library, which is an  
12 ongoing library that we keep on our website, it comes from our  
13 Diversity Council, that's one of the things we're going to be  
14 working on. We have a lot of output that we put out, but one  
15 of the things I'm focusing on next year for having is a  
16 resource for better words, better culturally competent language  
17 to use that will help you. So, it's coming Kyla, please stay  
18 tuned.

19 BD. MEM. SMITH: Thank you.

20 CHAIR POWELL-PALM: Thank you so much for your  
21 comments, Stephanie, and for joining us today. We really  
22 appreciate it.

23 Next up, we have Phil LaRocca, then Margaret Scoles,  
24 filed -- followed by MonaRae Tuhy.

25 Phil, please go ahead.

1 MR. LAROCCA: (No audible response.)

2 MS. ARSENAULT: We are getting Phil unmuted, I  
3 believe, Nate.

4 MR. LAROCCA: How about that?

5 CHAIR POWELL-PALM: Sounds good.

6 MR. LAROCCA: Okay. Sorry about that. Anyway, my  
7 name is Phil LaRocca, good afternoon. And I'd like to thank  
8 the board members because I know you put a lot of volunteer  
9 time into this, and it takes a lot of effort to do that.

10 I am owner and winemaker of LaRocca Vineyards. I'm  
11 chairman of the board for CCOF. I sit as vice chair for the  
12 California Organic Product Advisory Board. And I've been an  
13 organic farmer for pushing 56 years now, though I'm kind of in  
14 a semi-retirement mode since my farm took a pretty good burning  
15 in the California Camp Fire.

16 I'm going to talk about organic wine and sulfur  
17 dioxide; a topic that I know very well because 22 years ago  
18 with this board I wrote the rules for organic wine and wines  
19 made with organic grapes.

20 To start with a little history, sulfur dioxide is  
21 actually outlawed in the Food and Production act in any form of  
22 organic agriculture or production. Period. So, with that  
23 said, it would just open the door to other synthetic  
24 preservatives, so the board at that time, we came up with an  
25 organic wine to not have any synthetics, including sulfur



1 dioxide.

2           Now, we knew the California wine industry in  
3 particular was taking off and grapes we were be -- getting very  
4 popular so we had hundreds of acres of organic grapes coming in  
5 and, I realized that, so that another member of the board  
6 realized that, so we said we need to do something because  
7 fake -- for the sake of disclosure, I was one of the very first  
8 organic grape growers for the Montero Line, by the way.  
9 Anyway, so we said, well we got to do something, so we came up  
10 with the "Made with Organic" label. That was actually my idea.

11           Now, to pull that off wasn't very easy because the  
12 Food and Production Act outlawed sulfur dioxide. So how did we  
13 do it? The help of four senators from two different states,  
14 and I don't remember the bill exactly, but it's something to  
15 the effect of let's allow senior citizens to buy generic drugs  
16 at half the price, oh, and by the way, wines made with organic  
17 grapes could have sulfur dioxide added to them, and that's  
18 where we're at today. So, I spent a lot of time working on  
19 that. I still endorse it to this day. I accept both the  
20 organic wine and I accept the "Made with Organic" label.

21           But I do want to make a comment to what Joseph had to  
22 say early. Since that rule was passed, we've seen thousands of  
23 bottles of organic wine being produced. We have some organic  
24 wineries that are producing 50,000 cases of organic wine a  
25 year. When we were producing, we were in the 10 to 12

1 thousand-case range, always using organic principles and  
2 growing and in processing our wine. To this day, we still have  
3 inventory that we're selling out of our tasting room, that age  
4 from five to 17, 18 years old. So, it took us a while but  
5 organic wine makers, we got it figured out, and you don't need  
6 sulfur dioxide to make a wine. But I'm not here to tell a wine  
7 maker how to make his wine; I am here to say I endorse the  
8 wines made with organic grapes, and I absolutely endorse  
9 organic wine as the way it is. Thank you very much.

10 CHAIR POWELL-PALM: Thank you very much for your  
11 comments, and for joining us today. We have a question for you  
12 from Allison.

13 MR. LAROCCA: Yes, Allison.

14 BD. MEM. JOHNSON: Thanks, Phil. Really appreciate  
15 you being here and your many, many years of leadership. And  
16 I'm really sorry for the loss of your acreage in the fire.

17 I'm curious, you know, with this long-term  
18 perspective that you have, and your experience as a organic  
19 wine producer without the use of sulfur dioxide, what you think  
20 the impact has been on the growth of the organic wine sector?  
21 I, you know, when I was in certification, was explaining the --  
22 the labeling options to producers weekly, if not daily, and so  
23 I -- I'm at the point of sort of looking back and looking  
24 forward and -- and wondering where we should go from here? And  
25 if the current law is still working as it's written?

1           MR. LAROCCA: Yeah. The industry has grown, there's  
2 no doubt about it, but what we're experiencing in the wine  
3 industry, because I still stay in touch and we still have some  
4 small production -- my son leased to small vineyard -- but what  
5 we are seeing and what I'm talking with other organic wineries,  
6 and I'm not sure about the "Made with" guys, but we are seeing  
7 sales there but they're not wanting to pay the premium for  
8 organic.

9           So, one of the earlier speakers, and I'm really  
10 pushing this at CCOF, we need a major marketing campaign that  
11 shows that organic is better and it's worth paying the extra  
12 pennies for an organic product. That it's healthy for the  
13 environment. We personally think it's healthier for human  
14 beings, all the way around, and we need some marketing out  
15 there that pushes that because where we're -- even some of our  
16 big plum growers in California are saying, man, we're getting  
17 conventional prices and we're putting that extra dollar and --

18           The thing about organic is when we say we're getting  
19 a premium, I think most of the farmers on this call, that  
20 premium is just the cost of doing business organically, but  
21 now -- so the growth is there, the market is there, we just  
22 need to stabilize it price wise and make it so that it's worth  
23 it for the farmer to make a profit.

24           CHAIR POWELL-PALM: Other questions for Phil?

25           (No response.)

1           CHAIR POWELL-PALM: Phil, this has been a throughline  
2 for farmers across the calls today, that we need help in  
3 marketing and spreading the message about organic. And I was  
4 just wondering if you can envision, what would be your dream  
5 program, either with USDA as a partner, or as a private  
6 industry group, how do we get this message spread wide -- wide  
7 and far about what is organic and why it's worth the premium?

8           MR. LAROCCA: Well, first of all, I think we need to  
9 do a marketing campaign just like they did back in remember --  
10 remember the old raisin commercials? That boast [sic] the  
11 raisin production like, you know, tenfold so we need something  
12 like that. And I know that the USDA will have a hard time with  
13 this, but I -- I think not only do we need to promote the fact  
14 that organic is healthy for the environment, I think we need to  
15 show that organic is actually better in your diet. Period.  
16 You know, we like to say pay the farmer, not the doctor, so we  
17 need -- we need some kind of campaign that -- that runs -- that  
18 runs like that. And you can see from the OTA's scientific  
19 department there, you can see how many new crops are coming  
20 out, organic crops showing that they actually have higher  
21 nutrients of value than its conventional counterpart, and we  
22 need to promote that.

23           CHAIR POWELL-PALM: I'd love to follow up with you.  
24 Thank you so much with your call --

25           MR. LAROCCA: I'll be -- I'll be there next week.

1 CHAIR POWELL-PALM: Okay, let's talk. Thank you  
2 again, Phil.

3 MR. LAROCCA: You got it. Thank you.

4 CHAIR POWELL-PALM: Next up, we have Margaret Scoles,  
5 followed by MonaRae Tuhy and then Alice Runde.

6 Margaret, the floor is yours.

7 MS. SCOLES: Thank you.

8 Margaret Scoles, International Organic Inspectors  
9 Association, Montana. Hello NOSB members, NOP, and colleagues.  
10 This comment is mostly on the organic transition discussion  
11 document. IOIA gave written comments on residue testing in a  
12 global supply chain and on inerts.

13 Quickly, Sunset Reviews keep materials on the  
14 National List. The review of vaccines was very good work.  
15 Vaccines are essential and organic livestock.

16 Consistent location identification. As certifier, I  
17 work for -- this year decided that the crop acreage summary  
18 should show township section, range number for all fields. I  
19 was astounded at how much time it took for some fields I had  
20 inspected five to 10 years ago or more. The farmer shouldn't  
21 need to be present for the inspector to locate the fields. So,  
22 overall good work. Definitely needed. We commented last  
23 meeting on that topic.

24 On improving support for organic transition  
25 discussion document, fantastic initiative and a few thoughts.

1 One, you acknowledged that the formal public comment processes  
2 for OTI have been limited. Recognizing that the program had to  
3 be rolled out on a crushing timeline, that lack of opportunity  
4 was a dry -- drawback. What is working well? The synergy of  
5 TOPP funding, supporting building on existing transition  
6 efforts and regional organizations.

7 IOIA is part of a pre-TOPP, an MCAT-funded project  
8 through NRCS. We are doing workshops in six states focusing on  
9 field crops and ruminant livestock. Complementing those with  
10 TOPP collaboration has improved marketing about the events and  
11 allowed adding other crops and livestock.

12 The actual barriers to transition are not nearly as  
13 big as the perceived barriers. There are financial barriers.  
14 Yes, often some loss of production, some additional paperwork.  
15 A cost. We must protect cost share, and it takes time to  
16 maintain an organic system plan.

17 The way to successful transition is to make sure  
18 everyone is engaged. Inspectors have been helping farmers  
19 transition since the beginning, as we are often the only people  
20 on site. One of the most rewarding aspects of my years in  
21 inspection is seeing the change in operations as producers try  
22 new crops, improve rotations, incorporate cover crops, find new  
23 markets, and discover that they can actually transition the  
24 whole farm. We have to be sure we're providing technical  
25 assistance not helping applicants overcome barriers to

1 certification, and the NOP guidance document on technical  
2 assistance does a good job of explaining the difference.

3           Inspectors have always worked hand-in-hand with  
4 certifiers and processors -- processors, and retailers have  
5 helped producers transition to.

6           Five, transition must include development of an  
7 organic system plan, otherwise organic has perceived as no  
8 synthetic inputs. There's so much more to an organic system.

9           I was last week at the TOPP-supported workshop with  
10 Undersecretary Jenny Lester Moffitt and organic producers. We  
11 talked about what has been helpful in Montana.

12           And I am out of time. Many pieces are needed to  
13 create a support structure, and now we have funding for farmer  
14 mentors. Thank you.

15           CHAIR POWELL-PALM: Thank you so much for your  
16 comments. Amy has a question for you.

17           SECRETARY BRUCH: Yeah, Margaret, thanks for joining  
18 us today and providing your written comments. Also, thanks for  
19 reiterating your position on standardized location information,  
20 appreciate that. I wanted to ask on that.

21           And also in your written comments, I appreciate  
22 your -- your wanting to be collaborative to help develop risk  
23 assessments. That is awesome. I think -- I think teams are  
24 really important to get good synergy there, so thanks for your  
25 willingness to -- to go above and beyond on that one.

1 I wanted to ask you on the testing -- residue testing  
2 for global supply chain, your written comments. You mentioned  
3 that you would recommend that all bulk ships are met at port of  
4 entry for testing prior to offloading. And can you expand why  
5 that -- why you came up with that statement?

6 MS. SCOLES: I think it's a matter of risk  
7 assessment. I mean, if it -- the quantity is so big, that's  
8 one of the points we listed. Several points in which we think  
9 testing can be useful and one is when you have really large  
10 volumes that the risk is so much higher if -- if the load is  
11 not organic.

12 I think that's all I can say about that.

13 SECRETARY BRUCH: Okay. Perfect. Thank you.  
14 Appreciate it.

15 CHAIR POWELL-PALM: Allison, please go ahead.

16 BD. MEM. JOHNSON: Thanks so much, Margaret. I  
17 really appreciated your comments on transition. And I recall  
18 being in certification just feeling so nervous about stepping  
19 over that line into advising versus providing technical  
20 assistance as you said.

21 And I wonder if you have thoughts about how we can  
22 give really clear direction to inspectors? Like what more we  
23 can be doing to help producers get the benefit of the expertise  
24 that inspectors bring without crossing that line? You  
25 mentioned the written document, but I think like there may be



1 other things that we can do to help people with that.

2 MS. SCOLES: The guidance document is great, and we  
3 use it in our inspector trainings all the time, and we have  
4 exercises and we really try to focus on that, and get people to  
5 understanding the difference. I still see that it's a problem,  
6 though, that many inspectors are -- it's easier to say can't  
7 help you with anything. You know, I can't help you with that.  
8 And it's like you don't have to help people; you can have  
9 discussions. You know, I see there are no legumes in your  
10 rotation. That is not -- that's not overcoming a barrier. And  
11 I think -- so I think training is really important for  
12 inspectors and certifiers because both are bound by the same  
13 the -- the same part of the regulation.

14 CHAIR POWELL-PALM: Let's go Nate, and then Amy.

15 BD. MEM. LEWIS: Hey, Margaret. Good to see you.

16 Here, I -- I appreciated IOIA's comments on the  
17 testing document, and kind of homing in on the dynamic that  
18 creates where inspectors, as the face and boots on the ground  
19 are, you know -- it's easy for a certifier to say, yeah, you  
20 look at -- you look risky, we're going to sample you, and then  
21 the inspectors there and it can become very tense. So I --  
22 it's just something I haven't quite -- I -- I spent most of my  
23 certification time behind the desk, so it was easy for me to  
24 respond, you know, send out the samples and -- I'm -- and I  
25 appreciate the -- that you all offered some suggestions there.

1 But I'm -- I don't know if, maybe it's just an acknowledgement  
2 that I have read that and I appreciate that, and if you've got  
3 more to build on there, I really want to hear it and get it  
4 into the record.

5 MS. SCOLES: I think every -- almost every inspector would be  
6 so excited if -- if sampling wasn't part of the regular  
7 inspection, and that you just had certain inspectors who didn't  
8 mind doing it at all, or we're really good at it, or were  
9 specifically trained for it, and you sent them on a circuit,  
10 and they took all the samples. I mean, it doesn't have to be  
11 that way but certainly I think that there is some benefit to  
12 doing unannounced inspections and sampling at the same time.

13 I think the oddest thing for me as an inspector when  
14 we had to do unannounced inspections, I'm like oh no, and I  
15 show up and I'd be all apologetic, I'm so sorry, you've been  
16 selected, and those ended up being often really good  
17 inspections. And I've had more than one person saying -- say I  
18 wish all the inspections were unannounced, and I'm like really?  
19 I wouldn't think they would think that. They don't have to  
20 stay up all night, lose sleep, and worry about everything, and  
21 you maybe don't expect everything to be as perfect. And -- and  
22 maybe residue sampling is one of those things, too, that just  
23 goes good with an unannounced inspection.

24 Thanks, Nate. And thank everybody --

25 CHAIR POWELL-PALM: I have a question.

1 MS. SCOLES: -- for the questions.

2 CHAIR POWELL-PALM: Margaret, I was just wondering if  
3 you could speak a little bit to the -- the DEI work that IOIA  
4 has been involved in.

5 MS. SCOLES: Sure. It's been one of the most fun  
6 projects. Our partnerships, is that two years ago with the  
7 human capital we started -- the Human Capital Initiative, we  
8 started a project as a partner with Organic Farmers  
9 Association, ACA, IFOAM North America and National Organic  
10 Coalition, and then that led into the project that several  
11 people have been mentioning, like Ellie and Abby.

12 One of the things we learned really early on is that  
13 we didn't spend enough talking to partners -- organized  
14 partner -- potential partner organizations about what they  
15 wanted. We made the mistake of assuming sort of that we  
16 knew -- we wanted to do stuff that would be helpful, and so  
17 over the last several months I've been part of several  
18 conversations that were super useful where our facilitators  
19 picked a potential roster of organizations that could be  
20 partners, and these were either BIPOC led or organizations that  
21 focused on BIPOC producers, and so I was able to sit in on some  
22 interviews with organizations and it was really good to listen  
23 to what they had to say. I don't know where that will go, but  
24 for sure there's a lot of organizations that are -- are really  
25 needing resources and help and don't realize that resources are

1 available. So, it's fine if you create resources, but it was  
2 like -- I think it was Stephanie who said earlier you'd really  
3 have to start really local to get them to people. So, that's  
4 been one of the projects.

5 We also did another project last year with an intern  
6 that was -- we had our first intern, and it was through that  
7 project, so that was good. Thank you for asking.

8 CHAIR POWELL-PALM: Absolutely. Thank you. I'll say  
9 just anecdotally that it has been an amazing process to see  
10 after these efforts have been made that when we put on IOIA  
11 organic inspector training classes there are now folks becoming  
12 inspectors who were just not -- were not there before, and so  
13 folks from these communities that represent historically folks  
14 that didn't -- didn't get a chance to be inspectors, and so  
15 want to just thank you for the work that's gone into that. It  
16 has been tangibly effective.

17 MS. SCOLES: I think the certifiers deserve a lot of  
18 credit for that, too, because I think everybody is thinking  
19 more about diversity, equity, and inclusion and I think that's  
20 really changing the policies. And -- and it is. The faces of  
21 our cohorts coming to training has completely changed, as you  
22 know, being a trainer.

23 CHAIR POWELL-PALM: Yeah.

24 MS. SCOLES: Thank you.

25 CHAIR POWELL-PALM: Shout out to Ellie Hudson and the

1 ACA folks because it's -- it's working. Thank you, Margaret,  
2 for your comments.

3 Next up, we have MonaRae Tuhy, followed by Alice  
4 Runde, and then Doug Currier. After Doug, we have Ty O'Connor,  
5 John Wicks, and Joseph Kibiwott.

6 MonaRae, if you are there, the floor is yours.

7 MS. TUHY: Thank you, Nate. Sorry, I muted there.

8 CHAIR POWELL-PALM: Yes.

9 MS. TUHY: I'm MonaRae Tuhy from Bigfork, Montana,  
10 and I have sat on the MOA Board for about 10 years, and -- on  
11 the Montana Organic Association Board. I also was able to  
12 attend that session with Undersecretary Moffett last week. It  
13 was outstanding.

14 I have been working with -- my whole life I've been  
15 an organic gardener and never using additives and was a  
16 consumer since organic in probably about the late 80's when we  
17 could find them other than just farmers markets.

18 I work with school gardens locally, and we do  
19 everything organically, and we teach kids about the soil and  
20 what soil is, and how to build that. And that's -- that's  
21 probably what I love most about organics, is about soil  
22 building.

23 We have a lot of orchards -- cherry orchardists in  
24 this area and many of them are afraid to go organic because of  
25 the expense, and the paperwork because it seems overwhelming to

1 them. I would love to see a -- a campaign to educate people  
2 that it is not that difficult. It's not that expensive.

3 I think organic is a one-stop-shop for consumers to  
4 get the cleanest food grown with the most environmentally  
5 friendly practice in a system that rewards farmers. We won't  
6 get very far though when we're just doing it locally; I think  
7 every person in the industry needs to be highlighting how  
8 incredible organic is to everyone we know around the country.  
9 It's going to take everything we've got in the industry to  
10 reach every consumer, to educate them as to what organics is,  
11 and I would love to see the help from USDA, AMS, and if AMS  
12 could launch a campaign to educate consumers as to what organic  
13 is. It's always non-geome -- GMO, excuse me. Always  
14 antibiotic free. Organic ruminants are required to have access  
15 to pasture. I think that would help consumers understand more  
16 about what it is and probably more people to transition into  
17 organic as part of the incredible TOPP program. I am very -- I  
18 would love to see that continue on for many years. And I -- I  
19 like the "Pay the farmer, not the doctor." And I'm an age  
20 group that I remember that raisin commercial and, so that's  
21 what it would take.

22 And thank you, NOSB, for this opportunity to speak.

23 CHAIR POWELL-PALM: Thank you so much for calling in  
24 today. It's -- I think it's an especially helpful voice to  
25 hear from someone who's a -- a consumer. Not necessarily even

1 an active farmer, but who believes in organics so much that  
2 they'll dedicate the time that you've dedicated, so we really  
3 appreciate your comments today.

4 Questions for MonaRae?

5 (No response.)

6 CHAIR POWELL-PALM: I have one quick question for  
7 you, MonRae. As you think about the -- the marketing campaign  
8 that would go into trying to inform folks as to what organic  
9 is, what do you think are some of the most common myths that  
10 you hear about organic, besides the cost and the complexity?  
11 What are other things that you would love to see busted on a  
12 good poster in the school lunchroom right next to that "Got  
13 Milk?" poster?

14 MS. TUHY: Yeah, it -- it really is the cost. But  
15 it's also the dedication of the farmers in what they believe in  
16 and how they work with their soils and their land. Just  
17 keeping that, working that plan, you know, working that and  
18 getting people to understand the love of the planet and the  
19 land that farmers have.

20 I -- I know this isn't really part of your question,  
21 but I'll tell you, I would love to see a Super Bowl halftime  
22 commercial on organics.

23 CHAIR POWELL-PALM: Amen. Yes. Well, that sparked  
24 something; we've got a question from Amy for you know, so bear  
25 with us.

1           SECRETARY BRUCH: Yeah, thank you. No, that was --  
2 that was great. I love your thoughts on -- on marketing  
3 campaigns, MonaRae.

4           What so your -- I'm just curious, what is your  
5 accessibility to organic products in the area you live in?

6 MS. TUHY: Obviously, farmers markets, so we have the local  
7 CSA's et cetera.

8           SECRETARY BRUCH: Uh-huh.

9           MS. TUHY: Fortunately, we have a Costco in  
10 Kalispell, you know, 35 miles away. That's where I get a lot.  
11 We have Natural Grocers moved in about, oh, 15 years ago, so  
12 that's always been a good one. And then to the south we have  
13 Missoula, where we have several stores down there that we can  
14 get it.

15           I -- that -- those are the big ones. And I really am  
16 glad to see Costco carrying more, but boy when I look at the  
17 cost of the 10-pound bag of carrots and how inexpensive it is,  
18 it really bothers me wondering what that farm was making on  
19 that. I love the availability and the large -- and large  
20 quantities, but there's also to me, there's an a disadvantage  
21 on that from an economic standpoint.

22           SECRETARY BRUCH: Um-hum. Um-hum.

23           CHAIR POWELL-PALM: Well, thank you, MonaRae, so much  
24 for joining us today and for your -- your dedication, educating  
25 and supporting all the farmers out there. We really appreciate



1 your time today.

2 MS. TUHY: Thank you.

3 CHAIR POWELL-PALM: Next up, we have Alice Runde,  
4 followed by Doug Currier, and then Ty O'Connor. After Ty, we  
5 have John Wicks, Joseph Kibiwott, and then Jess Alger.

6 Alice, please go ahead.

7 MS. RUNDE: Thank you. Good afternoon. My name is  
8 Alice Runde, I'm the coalition manager for the National Organic  
9 Coalition, or NOC. I'd like to start by thanking all of the  
10 board members for their important work.

11 There's increasing consensus among the organic  
12 community that racial equity needs to be centered in our  
13 movements, creating a more equitable food system as a core  
14 value for the organic community. We must create a more  
15 diverse, equitable, and inclusive movement to achieve our  
16 vision of transforming our food system to benefit people and  
17 the planet, and I'm so excited to hear the topic of diversity,  
18 equity, and inclusion come up so much today.

19 More and more, research shows that BIPOC farmers  
20 experience the same challenges as White farmers, but at much  
21 higher rates. Addressing these challenges would help all  
22 farmers. We encourage the NOSB to interact with the USDA'S  
23 2023 Equity Commission Reports, which includes 32 actionable  
24 recommendations to modify programs, policies, practices,  
25 cultural systems, and structures to reduce disparities and

1 advanced racial justice and equity for underserved communities.

2 Many of these recommendations would be applicable to  
3 the NOSB. We also recommend that the NOSB encourage the NOP to  
4 engage with and address the recommendations listed in the  
5 report, as many of these are very applicable to the NOP.

6 In previous comments, NOC has recommended that the  
7 NOSB include racial equity as part of the CACS Subcommittee  
8 work. We understand that the NOSB may not have the capacity or  
9 resources for a standalone committee, focused on racial equity;  
10 however, as Abby mentioned in our response to ask these  
11 questions, we encourage the NOSB to find other mechanisms to  
12 both embed racial equity into their processes, and help the  
13 NOSB stay accountable to these goals.

14 We are excited to hear that the board is thinking  
15 about including equity training in the PPM. One way to have  
16 racial equity be a part of the NOSB processes would be to  
17 include racial equity as a standing agenda item in NOSB  
18 meetings.

19 At the Spring 2023 NOSB meeting in Atlanta, Georgia  
20 Organics' presentation of the legacy of structural racism in  
21 Georgia agriculture was extremely educational and very well  
22 received.

23 We commend the NOSB and the NOP for including this on  
24 the agenda. And are grateful for Georgia Organics for their  
25 work and presentation. Building on the success, NOC recommends

1 that the NOSB consider including a topic on racial equity as a  
2 standing agenda item for all their public meetings/

3 On crop insurance and transition, we appreciate the  
4 NOSB creating space for the organic community to discuss  
5 important topics like crop insurance and transition. On both  
6 of these topics, NOC emphasizes the importance of making sure  
7 that programs and resources are available, accessible, and  
8 relevant to all farmers, and the value of building on existing  
9 successful programs.

10 We also need to acknowledge and address the impact of  
11 historical discrimination on the access to and trust of  
12 government programs and authentically partner with  
13 organizations who have served underserved communities to  
14 restart building that trust.

15 And finally, on residue testing, NOC applauds the  
16 CACS for opening the discussion on residue testing and  
17 handling. And NOC supports the NOSB's proposal to require  
18 residue testing for handling operations.

19 Thank you for your time.

20 CHAIR POWELL-PALM: Thank you for your comments.

21 Questions for Alice? Allison, please go ahead.

22 BD. MEM. JOHNSON: Thanks so much, Alice. There's so  
23 much in your comments, I'm -- I'm trying to process it and  
24 there's still questions at the same time.

25 I think the -- that the thing that stands out to me

1 most from today, or one of the things is how much is happening  
2 on DEI in the organic community right now. We have several  
3 years of very conscious efforts, trainings that are -- that  
4 seem to really be facilitating progress and seeing the Equity  
5 Commission's report come up in comments in several places, I  
6 think it is very closely related to that.

7           And so, I'm curious for your reflection from where  
8 you sit on what more we, as an organic community, can be doing  
9 to like push to change the culture at USDA? I'm hearing a lot  
10 of the stakeholder shifting and that we're still bumping up  
11 against a very entrenched and challenging discriminatory  
12 history, and that progress that's being made within USDA isn't  
13 being dispersed equitably across the country. So, thoughts  
14 about sort of a -- a call to action for the organic community  
15 in addition to what we -- the board can do.

16           MS. RUNDE: Yeah, that's such a great question, and I  
17 wish we had a whole week to discuss it because I don't know  
18 that I know personally what the call to action should be. I  
19 think our first step as NOC and many of our partners has been a  
20 lot of education and trying to understand where we are today,  
21 how we got to where we are today, the discriminations that  
22 exist in our systems today, and I think we're approaching a  
23 phase where we might being -- be able to discuss how we  
24 dismantle those, how can -- how we can create a more equitable  
25 system as previous commenters have mentioned, rebuilding some

1 trust and rebuilding some relationships that have been broken  
2 in the past or have never existed.

3 I'm not sure I'm answering your question. I'd love  
4 for there to be a like this is the 32nd elevator spiel of how  
5 we will fix the system. I -- I don't have it personally. And  
6 I am looking forward to getting closer to it.

7 CHAIR POWELL-PALM: All right, thank you, Allison -- Alice, I  
8 apologize.

9 Let's take a break folks. Let's take five minutes,  
10 come back at the top of the hour. and we'll continue with Doug  
11 Currier after the break. All right, see you at top of the  
12 hour.

13 (Whereupon, a brief recess was taken.)

14 CHAIR POWELL-PALM: -- presentations. I echo all of  
15 the comments that have been applauding the hard work and  
16 serious consideration that our commenters have given to the  
17 process so far. And thank you to my fellow board members for  
18 slinging some great questions, so let's keep going.

19 Doug, the floor is yours. After you, we're going to  
20 have Ty O'Connor, John Wicks, Joseph Kibiwott, and then Jess  
21 Alger. Thank you Doug. Go ahead.

22 MR. CURRIER: Thanks, Nate. Hi, board members.

23 My name is Doug Currier, I'm the technical director  
24 at OMRI. I'm going to talk about inerts, everyone's favorite  
25 topic, but I do want to just say a word about OMRI.

1           So, OMRI is accredited by USDA Quality Assessment  
2 Division, and meets ISO-17065 quality standards. Within that  
3 standard, there's a non-discriminatory section, and our policy  
4 manual reflects that. And, you know, reliance on fee-for-  
5 service model is not unique to OMRI.

6           So, inerts. So, we see that there are two options  
7 here for modernizing inert ingredient review. One is the sort  
8 of administrative approach, where specific sections of the EPA  
9 regulations are referenced, and we believe that approach sort  
10 of meets partial review of -- of OFA criteria.

11           And in many ways an extension of what we have today  
12 is a second option, which is sort of a non-administrative  
13 approach, where individual substances are reviewed so that all  
14 criteria required by OFA is met. We support the second option,  
15 though we acknowledge, you know, that the burden on NOSB and  
16 NOP as far as capacity concerns go, but we believe this is the  
17 best option because it kind of resets the bar for inert  
18 ingredient review, and we believe that the NOP and NOSB should  
19 assert USDA statutory constraints and regulatory criteria at  
20 all times.

21           So, OMRI provides TRs, technical reports, to the NOP,  
22 and I'm going to give you one example within the template that  
23 we use. There are specific focus questions that have OFA  
24 criteria as a citation. So, in other words, OFA is -- is cited  
25 within those -- those specific questions.

1           So, Eval Question 7 says, "Describe any known  
2 chemical interactions between the petitioned substance and  
3 other substances used in crop production or livestock  
4 production. Describe any environmental or human health effects  
5 from these -- these chemical interactions." So, the point here  
6 is that without individual review you can't -- you can't answer  
7 that question. Also, essentiality comes into it, too.

8           I also just want to point out that toxicity studies  
9 that EPA publishes are cited often in these TRs, so it's not  
10 that we ignore everything that the EPA is doing, but there's  
11 just -- there's more that's expected, and now as an opportunity  
12 to -- to develop that system. That system, you know, there's  
13 value -- proven value into the rigidity of a system. So,  
14 we've seen the value with the current system, which is rigid,  
15 but we think that there needs to be some flexibility so this --  
16 NOSB rescinding its moratorium on the individual review of  
17 inert ingredients is an important first step in -- in building  
18 that flexibility into the system.

19           And I'll just close here by -- by saying that beyond  
20 pesticides, plan -- provides the urgency to set up this  
21 modernized system. It's just this concern about this deluge of  
22 of -- of interaction with -- with pesticides of manufacturers  
23 that is likely, you know, going to come, so I'll leave it at  
24 that. Thanks for -- for your attention.

25           CHAIR POWELL-PALM: Thank you for your comments.

1           Questions for Doug? Allison, and then Amy. Please  
2 go ahead.

3           BD. MEM. JOHNSON: Thanks, Doug. It's really helpful  
4 to hear from you, and it does seem like at least in the  
5 comments we heard so far, that there is a pretty strong  
6 interest in consensus in taking a look at these materials, even  
7 though it's gonna be a heavy lift.

8           And I'm curious for your take; I've asked the other  
9 few folks who've commented on inerts, how many products do you  
10 think we're dealing with? Or how many materials? Do you have  
11 a sense from where you sit about what this job is going to look  
12 like?

13           MR. CURRIER: Yeah, so we did work with WSCA, PCO to  
14 put together a list of -- of inverts that we know are used in  
15 organic production now. Within that, there's that subset, you  
16 know, excluding non-synthetic materials that don't need the  
17 review. But I -- I don't have that figure in front of me, but  
18 I'm thinking in the 140, 150 range all-in-all because I think  
19 there's -- there is something like 340 or so used in organic  
20 production now. Again, there's a subset that is -- is not  
21 going to need, you know, to -- to go through a -- a review  
22 because they're non-synthetic and allowed.

23           The classification system, I think that Beyond  
24 Pesticides has kind of put out there, too, is also helpful I  
25 think to think about, as far as category -- categorizing as a



1 way to add to the National List.

2 CHAIR POWELL-PALM: Amy, please go ahead.

3 SECRETARY BRUCH: Yeah, Doug, thanks for your time  
4 today. Really appreciate it.

5 In the past we've talked about final products and  
6 fortification that could take place, even in some of the  
7 National List items, too. We're reviewing a petition on  
8 potassium sorbate, and although that's the ingredient, the  
9 petition also includes a formulation for the final product.  
10 The NOSB is not evaluating the final product, but we do -- have  
11 had stakeholder comments on that final product, and I'm just  
12 curious, 55 percent of the final product is composed of inert  
13 ingredients, including urea and citric acid.

14 I was just wondering, does OMRI have limits on urea  
15 if it's -- if it's in an inert form in a finished product, just  
16 so supplementation of synthetic fertilizers can't take place?  
17 Or can you walk me through that?

18 MR. CURRIER: So, for fertilizer, that -- that would  
19 be prohibited to use a synthetic urea source. I think where  
20 urea comes in is this -- the list for inert. I believe it is a  
21 List 4. So, you know, the -- it's a different standard, the  
22 crop pesticide versus fertilizer. We do sometimes see  
23 pesticides that claim fertilizer, so there's like a dual use,  
24 and so we would -- we would definitely take a look at that  
25 because, you know, it's -- it's a prohibited nitrogen source.

1           SECRETARY BRUCH: Um-hum.

2           MR. CURRIER: And so, if they're claiming nitrogen,  
3 or -- or talking about it as a fertilizer, then it starts to  
4 become a concern I think.

5           SECRETARY BRUCH: Um-hum.

6           MR. CURRIER: The -- I guess we -- we do look at  
7 humic acid, you know, extraction, aquatic plant product  
8 extraction. It -- it's a struggle to kind of know when they're  
9 using too much and -- and then going towards fortification,  
10 because there's nothing like we have with liquid fish in the  
11 standard that kind of, you know, sets a limit.

12           But those are two examples that I know of that --  
13 that we do look at whenever we're looking at fortification or  
14 non-fortification. But that passing for everyone is  
15 interesting because it's -- it's -- again, it's a -- it's a  
16 prohibited nutrient -- plant nutrient source, and so if you  
17 start claiming it as a fertilizer, then it's -- then it becomes  
18 an issue.

19           SECRETARY BRUCH: Okay. And just for clarification,  
20 it's not -- it's not -- it's not, I guess, the purpose isn't a  
21 fertilizer, the -- its petitioned for an insecticide or  
22 fungicide, but --

23           MR. CURRIER: Yeah.

24           SECRETARY BRUCH: -- that just -- I just was asking  
25 on behalf of the community because that was where the questions

1 were on the final product seeing urea, so, okay.

2 MR. CURRIER: Yeah. Yeah, it's tough because label  
3 claims and -- and intentional -- the intention of using the  
4 product comes into play, too. So, if it's a crop pesticide,  
5 you might have some plant nutrients that are allowed as an  
6 inert because they're -- they're a List 4.

7 SECRETARY BRUCH: Um-hum. Okay, thank you, Doug.  
8 Appreciate it.

9 MR. CURRIER: Sure.

10 CHAIR POWELL-PALM: Another question for you from  
11 Nate.

12 BD. MEM. LEWIS: Hey, Doug. Good to see you.

13 Curious if you had an opinion on kind of the -- a  
14 little bit of a hybrid inerts approach where we would list --  
15 where there was -- I -- I just -- in the comments of the NPR  
16 suggested a solution of listing some EPA references with  
17 except -- so, it was like a -- an allowance with a prohibition  
18 and -- and it's a little bit of gymnastics there, I realize,  
19 but I'm curious if you had an opinion about that approach?  
20 Kind of sort of maybe in between?

21 MR. CURRIER: Yeah. I -- I -- there's a -- there's  
22 a, you know, this -- this practicality element that -- that's  
23 been at play for -- for probably as long as we've been talking  
24 about this, and I think that the thing with -- with referencing  
25 those lists is that you bypass the -- the OFA review criteria,

1 and so while a subset of the OFA criteria could be said to have  
2 been met, specifically like the toxicity concerns, you're not  
3 going to get at all. And so, you know, unless -- unless we  
4 have some sort of exception for inerts, which I don't think we  
5 have right now, you know, referencing bulk lists is practical  
6 and it -- and it certainly is in line with kind of our system  
7 that we have now, but we're -- I think we have an opportunity  
8 to do something different, which raises the confidence that --  
9 that these -- these materials are meeting the OFA criteria.

10 CHAIR POWELL-PALM: All right. We really appreciate  
11 your expertise and time. Thank you, Doug.

12 MR. CURRIER: You're welcome.

13 CHAIR POWELL-PALM: Next up, we have Ty O'Connor,  
14 followed by John Wicks, and then Joseph Kibiwott.

15 Ty, if you're there, the floor is yours.

16 MR. O'CONNOR: Hello. Thank you. My name is Ty  
17 O'Connor. My wife Sarina and I and our family operate O'Connor  
18 Crops and Cattle in Southeastern Montana. It's a 50,000-acre  
19 dry land farm and ranching operation. We've been certified  
20 organic since '08. It has been an incredible opportunity.

21 The organic farming allows us to grow crops and raise  
22 cattle for premium markets while maximizing our land  
23 stewardship. One thing about growing these crops, is what  
24 we've noticed is, the cereal grain side, the farming side,  
25 we've been paid premiums where they're double or sometimes even

1 triple of conventional products, but on the beef side we've  
2 never exceeded 10 to 15 percent of the conventional market.

3 In 2020, we -- we've shipped cattle to California --  
4 organic fats to California for probably eight to 10 years, and  
5 in 2020, we -- our shut -- or our supply got cut back because  
6 they said that the plant had COVID and it was not operating;  
7 the plant was operating, they were just trying to shorten the  
8 supply chain to keep prices increased in the California market.

9 At that point, we kind of were fed up with that, what  
10 they were doing to the consumer and to us, and so we invested  
11 about \$5 million in constructing our own certified organic USDA  
12 slaughter facility on our ranch here. It's operational now,  
13 and we have a -- quite a large organic cattle supply that we --  
14 that we've been processing and trying to sell in local markets,  
15 internet markets, and then trying to get on both coastlines.

16 We've encountered an issue with the supply -- the  
17 supply line or trying to get it to the consumer. Bigger stores  
18 that, you know, including some represented on this call, claim  
19 to support organics but do not carry organic beef, despite  
20 offering competitive pricing -- pricing, they opt to sell  
21 natural. Well, we have -- we have a ready supply of certified  
22 organic products.

23 Distributors and co-ops in the Seattle area refused  
24 to allow us to sell our certified organic grass-fed beef in a  
25 single store or restaurant, and that's any -- on their

1 distribution chain out there in Seattle, we've tried different  
2 distributors. We did -- we've hired a salesman, paid him  
3 \$21,000 that worked four months and had zero progress in  
4 getting in any stores in the Seattle area with our organic  
5 product, and it wasn't because of price.

6 For organic, especially in the grass-fed sector,  
7 to -- to thrive, we need grocery stores to recognize the value  
8 of the organic seal. We must educate stores that don't  
9 currently carry a -- that --

10 CHAIR POWELL-PALM: Go ahead and finish your comment.

11 MR. O'CONNOR: Oh, sorry.

12 CHAIR POWELL-PALM: No, you're good.

13 MR. O'CONNOR: I mean, to basically wrap it up, I  
14 mean, we just need the USDA to be aware. Public awareness  
15 campaigns about organic farming so consumers can understand  
16 what the organic seal means. And to, you know, just continue  
17 to strengthen that organic seal is kind of what we're thinking,  
18 and to make the playing field level in the organic beef sector.

19 CHAIR POWELL-PALM: Thank you very much for taking  
20 the time to talk to us today.

21 Questions for Ty from the board? Amy, please go  
22 ahead.

23 SECRETARY BRUCH: Hi. Thanks for joining us. I  
24 didn't have a question, I just wanted to say thank you. Thanks  
25 for bringing your story. I wish I could help, but I think this

1 is the first step is, at least letting us know of the  
2 challenges and hopefully our organizations that work on the  
3 Hill can also hear your message and work on expanding markets  
4 for organic farmers. I'm just impressed with your  
5 entrepreneurship and your vertical integration; that's what we  
6 need in organics, so thank you.

7 MR. O'CONNOR: Thank you.

8 CHAIR POWELL-PALM: I -- I had a quick question for  
9 you, Ty. Or actually, I'll let Mindee go and then I'll go.  
10 Go ahead Mindee.

11 VICE CHAIR JEFFREY: Yeah, thanks guys for your good  
12 work out there.

13 I want to be careful and not disparage anyone in  
14 particular, but I do -- I am really curious if when your  
15 salespeople went to the retailers, what were the reasons they  
16 gave you for saying no?

17 MR. O'CONNOR: Really never had a great reason. A  
18 lot of running around, and then just said, no, they didn't  
19 think the -- the grocery stores that they were distributing to  
20 would be interested in that product.

21 We went to a lot of organic, you know, supposedly  
22 where, you know, they sell organic product and -- and we did  
23 witness it, and we had zero luck getting in there, into these  
24 stores, and this was -- these were co-op stores, so that --  
25 that doesn't make a lot of sense to me. And we have, you

1 know -- and supply wasn't the issue. You know, that's what we  
2 kind of thought they'd say is, you can't supply us with enough,  
3 and we guaranteed them whatever they wanted because our -- our  
4 beef herd is big enough to supply a pretty, pretty decent sized  
5 chunk of Seattle there.

6 VICE CHAIR JEFFREY: Thank you for your good work,  
7 Ty.

8 CHAIR POWELL-PALM: I have a quick question for you,  
9 Ty. So, these grocery stores -- I don't think we have the  
10 chance to talk about the -- the one step between the consumer  
11 for selling organic and that is a grocery store -- did they  
12 sell -- the grocery stores you were trying to work with, did  
13 they have any organic beef on shelf already?

14 MR. O'CONNOR: Some did. And then some did not.

15 CHAIR POWELL-PALM: Okay.

16 MR. O'CONNOR: You know, some of the -- some of the  
17 stores actually had local products, but no organic products in  
18 those stores. And they were not interested in a local and  
19 organic product.

20 And then, you know, some of the stores had, you know,  
21 somewhat of a variety but not a huge variety of organic  
22 products.

23 So, yeah, they had -- they have -- they had product  
24 in the stores, some of them, yes.

25 CHAIR POWELL-PALM: All right.



1           MR. O'CONNOR: But, you know, that's -- you know, we  
2 kind of targeted that area. We had done our research. You  
3 know, one of the two biggest cities for buying organic meat is,  
4 I think it's San Francisco and Seattle on West Coast.

5           CHAIR POWELL-PALM: Um-hum.

6           MR. O'CONNOR: So, we targeted Seattle because we  
7 thought that would be a great market.

8           Right now, we're -- we're doing a targeting,  
9 marketing campaign in the Seattle area for our internet sales,  
10 and we'll see how that works. The -- the Internet is a  
11 interesting sales machine trying to get the people that we have  
12 something unique and organic and that we're not Butcher Box,  
13 that were not, you know, all the big -- the bigger Internet  
14 meat stores. We're trying to pursue the angle that, you know,  
15 we -- this -- all of our product comes from our one ranch, and  
16 it's all processed here on the ranch, and there -- that we  
17 might be the only one organic certified USDA facility in the  
18 nation that can say it all comes from one location.

19           CHAIR POWELL-PALM: Yeah. That is awesome. Well, I  
20 think that there's, you know, a big conversation to have here  
21 with how do we get retailers to be those storytellers of why  
22 organic is worth the premium. And, yeah -- yeah, please go  
23 ahead.

24           MR. O'CONNOR: But one more -- one more comment. One  
25 thing out there that we heard a couple times is it takes nine

1 months to start a new product, and it's a lot of work for the  
2 store manager and the and the meat store manager to promote and  
3 start another new meat product, and that was said a couple  
4 times, that it's really like, really? We're already making  
5 money, why do we need another one -- another product to try to  
6 make money on?

7 CHAIR POWELL-PALM: Mmm. Well, I hope there's some  
8 folks on this call who can ideate on this, and we can all work  
9 on this together to figure it out. Really appreciate you  
10 calling in today and taking the time to talk to us.

11 MR. O'CONNOR: Thank you.

12 CHAIR POWELL-PALM: Next up, we have John Wicks,  
13 followed by Joseph Kibiwott, and then Jess Alger.

14 John, if you're there, the floor is yours.

15 MR. WICKS: All right. Thanks, Nate.

16 Yeah, my name is John Wicks, I'm the owner of Tiber  
17 Ridge Organics. I'm at drylands grain, pulse, and forage  
18 operation located outside of Ledger, Montana. I'm a first-  
19 generation organic producer, and a fourth-generation farmer,  
20 and I'm pretty proud to be a steward of my family's  
21 multigenerational farm here.

22 Been certified organic since 2016, and organic has  
23 been a big game changer for my farm, being able to get away  
24 from the toxic chemicals with herbicide and pesticides, and  
25 ultimately running a profitable business that allowed me to

1 keep farming.

2           Organic has been like a great opportunity for my  
3 farm, for me to join a community of people that work hard to  
4 produce food under the strictest and best regulated food  
5 standard we have in the U.S. That might not be possible for  
6 transitioning farmers in the future unless we focus on  
7 increasing consumer demand.

8           Demand for organic is directly linked to education.  
9 There are a ton of myths surrounding organic, and so much  
10 consumer confusion, and I think that if every consumer knew how  
11 incredible the standards are written and the power enforcement  
12 behind the seal of organic, I don't have any doubt that we'd  
13 have a massive increase in demand for organics. That sort of  
14 education that's been -- that's going to be necessary to make  
15 consumers aware of organic, and -- is bigger than any one  
16 farmer or any organic group can do. We need the strength and  
17 brilliance of the Agricultural Marketing Service to launch an  
18 education campaign across the U.S. to educate consumers about  
19 organic. We need you to help describe the soil building  
20 practices required by that rule. The fact that organic is  
21 always non-GMO, and the fact that organic is the only food  
22 grown without toxic herbicides and pesticides.

23           Organic has been an incredible opportunity for me and  
24 many other farmers like me. I'm great [sic] for all the  
25 resources the USDA is putting into helping farmers transition

1 to organic. And now we need the U.S. to get -- USDA to go one  
2 step further to help drive the demand. Any dollars spent  
3 helping educate consumers about organic, earn investment in the  
4 viability of a small and medium sized farm. A good investment  
5 in rural America and a good investment for the health of our  
6 environment and people. Thank you.

7 CHAIR POWELL-PALM: Thank you. Really appreciate  
8 your comments today. Gosh Dang. I think -- well, I'll see if  
9 there's any other questions for you, John.

10 Questions from the board?

11 (No response.)

12 CHAIR POWELL-PALM: I think the throughline that I've  
13 been seeing is this question of how do we get the message out?  
14 There are all these farmers, about to be a lot more  
15 transitioning farmers, who need a strong market and we need to  
16 be able to communicate across the board why organic is  
17 exceptional. Such a good buy. So worth your dollar. And I  
18 know a lot of folks on this call know that already, but telling  
19 your neighbor how -- how great it is, is a lift.

20 What would you say, John, are your -- your absolute  
21 favorite attributes as you've gone to be an organic farmer from  
22 conventional, what are the things that really settle -- settle  
23 in your body as far as this is so this -- is the truth. This  
24 is the way it's supposed to be. This is why I'm here.

25 MR. WICKS: I really just -- I look at it more as a

1 food product rather than a commodity. And that's been, you  
2 know, I see the importance of making a clean product for people  
3 to eat, you know, and the end product is the consumer.

4           Before, I was -- I was growing, you know, a crop and,  
5 you know, I didn't care if there was whatever going through the  
6 auger, and it was just kind of, you know, free for all. And  
7 now that I care a little bit more about that, and I realize  
8 that this is food for people, like it's just been really  
9 empowering to really focus on that. And I think that, you  
10 know, some of my neighbors kind of don't understand that  
11 they're growing a food product and, you know, they'll spray  
12 pesticides or whatever on it and they just don't really  
13 understand that this is food.

14           CHAIR POWELL-PALM: Yeah. This is -- that, I -- I  
15 couldn't agree more. I think that is absolutely incredible.

16           Allison has another question for you.

17           BD. MEM. JOHNSON: Thanks, John. You have just half  
18 answered the question I was going to ask you, anyways, but one  
19 of the challenges that I run into in messaging the benefits of  
20 organic is that there are a lot of operations that have some  
21 organic, some conventional, or for whatever reason sort of need  
22 to state good things about all farming systems and are  
23 reluctant to raise organic up above any other farming system.

24           And I'm curious, since you've come from a range of  
25 perspectives, if you have thoughts about how to nudge people in

1 the -- in the direction of saying good things about organic?  
2 And if there are ways that we can do that without disparaging  
3 other types of farming?

4 MR. WICKS: (No audible response.)

5 CHAIR POWELL-PALM: Oh, I think you're muted, John.

6 MR. WICKS: Sorry, my dogs were barking so I muted  
7 myself real quick.

8 CHAIR POWELL-PALM: Oh, good.

9 MR. WICKS: Yeah, I think -- I think the best thing  
10 to do is definitely education and, you know, like teaching  
11 people that there's different ways to do things, and I think  
12 people get caught up in just the same recipe of this is how  
13 it's done, and this is what I want to do, and that -- that's  
14 easy and they, you know, do A, B, and C, and then they don't  
15 worry about it. Like, really it's been pretty enjoyable to  
16 learn actually how to farm. and I enjoy sharing that with  
17 people. And when you kind of get them caught on that little  
18 bug of they get really interested, and I think that that's the  
19 thing, is just sharing positive, you know, perspectives and,  
20 you know, everybody's trying to do the best that they can, and  
21 if you get them interested in these like different practices,  
22 then it just -- it steamrolls and they just get caught up in  
23 it.

24 CHAIR POWELL-PALM: One last question for you, John.  
25 When we talk about educating consumers, in my head it's not

1 necessarily that we have to decide what's better, but just  
2 there's such a dearth of information about -- there's so many  
3 myths about organic.

4           Do you think it's possible that we would -- it would  
5 be an effective deployment of resources if we got help from  
6 USDA for AMS to just like explain the rule to consumers in  
7 layman's terms, this is a soil building rule. This is the  
8 animal welfare component.

9           MR. WICKS: Definitely.

10           CHAIR POWELL-PALM: And not even need to go into,  
11 this is better than conventional necessarily. People can make  
12 their own conclusions.

13           MR. WICKS: And that's definitely it. I mean, a lot  
14 of the myths that you hear are just, you know, so untrue and I  
15 think just like explaining that to consumers, and then knowing,  
16 just getting that message out there of what that is, I think  
17 would drive people. And to know how much work that goes into  
18 produce that food, and how much care goes into it, I think  
19 people would shift that way just knowing that. And so, so I  
20 think it is about educating, sharing that story of being a  
21 farmer.

22           CHAIR POWELL-PALM: Awesome. All right. We can't  
23 thank you enough for joining us today.

24           MR. WICKS: Thank you.

25           CHAIR POWELL-PALM: And I -- it's evidence that we're

1 having all these farmers call in virtually, it's a busy time of  
2 year all the time, so thank you for making the time to give us  
3 your comments. Appreciate you.

4 MR. WICKS: Thank you.

5 CHAIR POWELL-PALM: Next up, we have Joseph Kibiwott,  
6 followed by Jess Alger and then Jordan O'Donnell.

7 Joseph, please go ahead.

8 MR. KIBIWOTT: Good evening -- Good afternoon,  
9 everybody. My name is Joseph Kibiwott, and I am the lead  
10 agronomist at Timeless Seeds. My -- I'm a certified crop  
11 advisor and my professional training is in soil science, with a  
12 strong focus on soil fertility management in organic cropping  
13 systems.

14 A little bit about Timeless. So, Timeless is for the  
15 last 30 -- almost 37 years, Timeless has been working with  
16 growers sourcing and contracting with about four dozen growers  
17 in Montana, and the neighboring states, to produce organic  
18 lentils, chickpeas, and two ancient grains, that is Emmer and a  
19 Purple Barley, and we want to maintain that momentum.

20 So, for me as an agronomist, my job is to go out,  
21 meet these growers, and give them agronomic advice on how to  
22 improve the production of these crops. We have to acknowledge  
23 that the demand for organic food is increasing. Organic  
24 generally is increasing, and that is evidenced by the amount of  
25 growth that has been shown. And to maintain that momentum, we



1 need to ensure that farmers are supported to transition more  
2 land, and also to maintain that certification. And thanks to  
3 the TOPP program that is already in place. I think that's a  
4 great way that we can do this. But I feel that there's still  
5 more to be done.

6           A lot is yet to be done, and from my own speaking  
7 about my interaction with all these farmers that I meet every  
8 day, some of the challenges that are impending the growth of  
9 organics is for our environment it's a dry land environment,  
10 and some of the challenges that our farmers see, is one is on  
11 crop insurance. I would feel that some of the crops that our  
12 farmers could grow can't because they are not insured in so  
13 many environments. And for those who grow pulse crops, they  
14 cannot maintain pulse crops in the rotation because it has to  
15 take four years between one pulse crop to the next. And in  
16 between you need another crop.

17           So, some of the recommendations is probably have  
18 inter-cropping or relay cropping and ensure a crop to ensure  
19 that there is continuity. That way, they can also maintain  
20 that certification, control the weeds, and all that.

21           The other thing that we are seeing is inadvertent  
22 pesticide contamination of some of the crops. When we  
23 experience this, it's not the problem -- it's the -- the  
24 organic farmer is not at fault, but that crop becomes  
25 decertified. Not only does it affect the farmer, it affects

1 also the process of like Timeless because we cannot market that  
2 crop, and our markets are affected really bad.

3 And the last one that I want to say is, how do we  
4 educate more growers? Maybe bring in more -- more growers --

5 CHAIR POWELL-PALM: Go ahead and finish you -- yeah.

6 MR. KIBIWOTT: Connect growers to talk amongst  
7 themselves, so that experienced growers can teach the young  
8 growers on how to transition and to maintain that  
9 certification. Well, thank you for your time.

10 CHAIR POWELL-PALM: Thank you so much.

11 MR. KIBIWOTT: Yeah.

12 CHAIR POWELL-PALM: We have a question for you from  
13 Nate Lewis.

14 MR. KIBIWOTT: Okay.

15 BD. MEM. LEWIS: Yeah, thanks, Joseph.

16 First of all, my household loves your Black Beluga  
17 Lentils, so please keep them coming. They're the best. We  
18 call it black gold, and we have it with halibut, and so we have  
19 white gold and black gold together; it's really delicious. But  
20 my question is related to your -- your comment around pesticide  
21 drift and the impacts on prices.

22 Do you know if any of the crop insurance coverage  
23 would cover that kind of loss? Have you encountered that  
24 where, you know, someone loses their certification of their  
25 crop or their field and then there's an indemnity from RMA for

1 that loss?

2 MR. KIBIWOTT: Just to -- to this point, we -- there  
3 is none.

4 BD. MEM. LEWIS: Okay.

5 MR. KIBIWOTT: That we know of. Actually, a very --  
6 we are a classic example because we've had a grower who had  
7 pesticide drift that affected his product, and it was  
8 decertified, and he can't market it anywhere, and we lost the  
9 potential for a market that -- that's already there. So,  
10 that's one thing that I really feel the USDA should come in and  
11 maybe find a way to -- through RMA or other insurance options  
12 for such growers to be compensated for the loss of a crop.

13 BD. MEM. LEWIS: Okay. Thank you for that.  
14 Appreciate it.

15 MR. KIBIWOTT: Yeah.

16 CHAIR POWELL-PALM: Allison has a question for you.

17 BD. MEM. JOHNSON: Thanks so much for your comments,  
18 Joseph.

19 I'm Curious to dig in a little bit more on market  
20 development. I know Timeless has been really successful in  
21 sort of creating markets for crops that didn't have much  
22 consumer interface when the company started. Black -- the  
23 lentils being a favorite in our house, as well, now thanks to  
24 you. And so, I'm curious how much you're kind of doing in-  
25 house as far as thinking about new consumer uses for pulses?

1 And/or if there's a collaboration with the processing industry?  
2 My like daydream continues to be the -- the crop rotation  
3 burger that someone figures out a cute marketing scheme for.  
4 And so, I'm -- I'm interested in the types of resources that  
5 you need to support market development that's already  
6 happening.

7 MR. KIBIWOTT: Thank you very much. That is  
8 incredible. I would say within just Timeless alone, we try to  
9 connect with researchers, food researchers, to -- who want to  
10 do value addition so that at least we can market our products  
11 through different channels. One is creating some products out  
12 of lentil flour, adding -- doing value addition, maybe creating  
13 some noodles from chickpeas, but we are limited because of the  
14 amount of resources that are required to facilitate, you know,  
15 to pay for all those research and development opportunities.  
16 And we want to do it within the country, not just allowing  
17 anybody from say shipping our products overseas and letting  
18 those people do it, and then we have to import it back. So, I  
19 think there are opportunities that could help us improve on  
20 that if we get more say funding, more resources.

21 Opportunities to teach even our own marketing teams  
22 or give them an opportunity to go out on trade missions that  
23 are specifically focused on organic especially. That would  
24 really help us to not just go on these trade missions but go  
25 out on a specific mission that focuses specifically on

1 organics.

2           And I'll just, not to take much time, but I'll give  
3 an example. Europe, for example, they don't allow pesticide,  
4 you know, contaminants in most of the product that they import,  
5 and I'm yet to see a specialized focused mission to some of  
6 these European countries just to market organics, and I think  
7 we have an opportunity there.

8           CHAIR POWELL-PALM: Well, thank you, Joseph. Really  
9 appreciate you taking the time to call in today. We were just  
10 lamenting how we need to hear from more handlers, more folks  
11 processing and buying these foods from farmers and making them  
12 into food for consumers, so thank you for taking the time to  
13 join us today. We appreciate it.

14           MR. KIBIWOTT: Thank you.

15           CHAIR POWELL-PALM: Next up, we have Jess Alger,  
16 Jordan O'Donnell cancelled, so Jess Alger, and then Emily  
17 Moyer, and then Lisa Wade.

18           So, Jess, please go ahead.

19           MR. ALGER: Hi, there. I'm Jeff Alger. I raise  
20 certified organic cattle and hay and wheat and peas and black  
21 Beluga lentils, and I live in Stanford, Montana. I have  
22 cow/calf operation; we have yearlings and two-year-olds, and I  
23 sell the two-year-olds as beef. I'm here today to comment on  
24 the fact that we need to help consumers understand how  
25 wonderful organic is, and to help grow this market.

1           You often hear folks say that there's no difference  
2 between conventional and organic; that grass-fed conventional  
3 is better. Well, I disagree. I'm either -- so I can't explain  
4 to everyone in the country all the great attributes about  
5 organic myself, but I know grass-fed organic has Omega-3s, and  
6 is healthier for you. We need USDA to explain what organic is  
7 and why it's excellent. Consumers would consistently choose  
8 organic if they weren't confused by all the other labels. I  
9 think only the USDA has a big enough budget; they help us  
10 educate consumers about the value of organic products.

11           In addition to being a rancher, I'm also a mentor to  
12 two -- to two -- they're new ranchers. The TOPP money that's  
13 recently gone out is a great investment. The great investment  
14 in helping manner new -- mentor new folks to transition to  
15 organic, but there's not growing or consumer demand for organic  
16 if they don't have a strong market that will keep them growing  
17 organic.

18           I recently learned that AMS spends \$15 million a year  
19 helping promote ham. Organic is a \$60 billion industry. So, I  
20 hope it makes sense to everyone that we need a -- a marketing  
21 budget that helps educate everyone about organic.

22           I appreciate the investments so far, and let's say we  
23 now need the USDA to allocate funds to help create additional  
24 educational campaigns to explain what organic is and why it's  
25 great to every consumer in the U.S. Thank you.

1           CHAIR POWELL-PALM: Jess, thank you so much for your  
2 comments. Really appreciate it. And that mentorship component  
3 is absolutely essential. I've met some of your former mentees;  
4 they are ranchers themselves around the state now, and around  
5 the country, and it's really cool to -- to see all of the work  
6 you're doing to try to help new farmers get into the space.

7           Any questions for Jess from the board?

8 (No audible response.)

9           CHAIR POWELL-PALM: I've got a question for you,  
10 Jess.

11           Could you tell us if you were to come up with a -- a  
12 slogan or a piece, an attribute of organic, that you think is  
13 just the absolute bee's knees, the thing that every organic  
14 consumer should know, or every consumer should know about  
15 organic, what resonates most with you about why organic?

16           MR. ALGER: Well, most organic production is more  
17 nutritional, has more vitamins and minerals, and it's just  
18 better for you. That -- I think that -- a lot of people don't  
19 understand that. I know my neighbors don't.

20           CHAIR POWELL-PALM: We'll start with them and then  
21 we'll go across the whole country. Well, I really --

22           MR. ALGER: Okay.

23           CHAIR POWELL-PALM: -- appreciate you taking time to  
24 call in today, Jess. I'm really grateful we have this platform  
25 to hear from so many farmers, and to only take minutes of your

1 day, not three days and a plane ride. So, thank you so much.

2 MR. ALGER: You bet. Thank you.

3 CHAIR POWELL-PALM: Talk to you soon.

4 Next up, we have Emily Moyer, followed by Lisa Wade,  
5 and then Mark Smith.

6 MS. MOYER: Yes, hello everyone. Good afternoon. My  
7 name is Emily Moyer, I am the vice president of regulatory  
8 compliance and global food safety standards at the  
9 International Fresh Produce Association.

10 So, first, thank you to the NOSB for your time and  
11 efforts dedicated to this Sunset Review process. And also for  
12 the opportunity to provide comments today.

13 IFPA represents over 2500 companies from every  
14 segment of the global fresh produce supply chain, including  
15 over 500 companies directly involved in the production and  
16 handling of organic fruits, vegetables and florals. My  
17 comments today are representative of our IFPA Organics  
18 Committee, who similarly represent a diversity of organic  
19 commodity and operation types, regions, and experience. Each  
20 of the materials being reviewed this year are of utmost  
21 importance to organic producers. I'll direct the board to our  
22 written comments for further explanation of each substance we  
23 supported. Today my comments will focus on ethylene gas and  
24 alcohols. My colleague, Sarah Nandu Reed, will be addressing  
25 our positioning on plastics and plastic mulch in her comments



1 late Thursday afternoon.

2           So, first, IFPA supports the continued listing of  
3 ethylene gas as a plant growth regulator. Ethylene gas is  
4 essential for organic pineapple production to induce flowering,  
5 ensure uniform ripening, and facilitate the consistent  
6 availability of pineapple products. Along with the impact of  
7 pineapples, the continued listing of ethylene gas in handling  
8 is critical to continue its use in post-harvest ripening of  
9 tropical fruit and the degrading of citrus. For each of these  
10 commodities, ethylene gas is used to provide organic farmers  
11 the ability to harvest earlier in the growth cycle, when it can  
12 be more -- when the products can be more easily shipped without  
13 damage.

14           IFPA has not identified non-synthetic alternatives,  
15 and without these alternatives, our growers anticipate there  
16 would be a sharp increase in waste due to damaged product, as  
17 well as a subsequent decrease in accessibility of organic  
18 products that rely on ethylene gas for handling.

19           Second, IFPA supports the continued listing of  
20 ethanol and isopropanol alcohols on the National List. These  
21 products are critical to maintain irrigation systems and  
22 support effective sanitation programs for our fresh produce  
23 growers and handlers. We believe it is critical that all  
24 producers have the most effective products available to them to  
25 clean and sanitize their equipment, and to prevent cross-

1 contamination of both human and plant pathogens.

2           Currently, we understand that the organic ethanol  
3 market is limited in terms of production facilities, and  
4 certain restrictions provide challenges in the handling  
5 requirements of organic ethanol. As a result, our membership  
6 has concerns about whether there are sufficient quantities and  
7 if it would be economically feasible to source ethanol  
8 organically.

9           As mentioned, we encourage the continued listing of  
10 additional other substances as detailed in our written  
11 comments. Thank you again for the opportunity to present.

12           CHAIR POWELL-PALM: Thank you so much for your  
13 comments today. We really appreciate it. Amy has a question  
14 for you.

15           SECRETARY BRUCH: Thanks, Nate.

16           Emily, thanks for being here today and supplying your  
17 written comments. I was just cross -- cross-referencing your  
18 comments from the spring to those in the fall, and I saw in the  
19 spring you were in support of potassium sorbate, and in the  
20 fall I didn't see any acknowledgement of potassium sorbate.

21           Could you just let me know a little bit about your  
22 stance on that product?

23           MS. MOYER: Yeah. So, actually I was -- I was  
24 listening earlier to the comments today and I think we're in a  
25 very similar position as -- as Dan Langager mentioned, with at

1 Northwest Port, just that it's something we -- if we have the  
2 ability to I think dig a little bit deeper within our  
3 membership, that's certainly something we would do, but having  
4 not heard that at least over these few months since the spring  
5 comments, we also decided to -- to take those out of our fall  
6 comments.

7 SECRETARY BRUCH: Thank you, Emily. Appreciate that.

8 MS. MOYER: Thanks, Amy.

9 CHAIR POWELL-PALM: Other questions for Emily?

10 (No response.)

11 CHAIR POWELL-PALM: All right, we really appreciate  
12 your time today. Thank you.

13 MS. MOYER: Thank you everyone.

14 CHAIR POWELL-PALM: Next up, we have Lisa Wade,  
15 followed by Mark Smith, and then Bob Quinn bumped to Thursday,  
16 so we're going to go to Doug Crabtree after that.

17 MS. WADE: Thank you, Nate.

18 CHAIR POWELL-PALM: Yes. Please go ahead.

19 MS. WADE: Thank you, Nate.

20 My name is Lisa Wade, and I and my family raise  
21 certified organic beef, pastures and forages, in Kyla, Montana.  
22 We first became certified organic in 2004 and have been  
23 continuously certified since then. And we have built our  
24 business around the certified organic label, slowly building a  
25 local consumer base.

1           We spend a lot of time educating our customers on  
2 what exactly it means to be organic. So, for codifying the  
3 most regenerative practices of any agricultural standard that  
4 requires us to build soil and raise our herds without hormones,  
5 GMO feed or antibiotics, organic is the gold standard.

6           Besides being an organic beef producer, I'm also the  
7 administrator of the Morgan -- Montana Organic Producers  
8 Cooperative. While all of our co-op members have exceptional  
9 quality organic beef, a lack of consumer awareness has slowed  
10 our growth. Of our member ranchers, many of them end up  
11 selling their calves each year into the conventional supply  
12 chain despite being certified organic. The demand just isn't  
13 strong enough. We need to all gather around a common message  
14 and spread the word about all of organics amazing attributes.

15           While everyone on the NOSB and on this call, we can  
16 all individually educate our community and our customers as to  
17 why organic is so great. It will take a bigger microphone to  
18 spread the message to every consumer in the USA. We need  
19 USDA's help to educate consumers about what organic is and why  
20 it's an exceptional label. From raising beef without any  
21 growth hormones, GMO feed, antibiotics, and raising our forages  
22 without synthetic fertilizer or herbicides, organic represents  
23 the most complete system for regenerative holistic management.  
24 It's also the only fully transparent system out there.

25           So, given the power of USDA's agriculture marketing

1 service. and the exceptional qualities of organic production, I  
2 hope that the Agricultural Marketing Service will launch a  
3 marketing campaign to help us, the producers, spread the word  
4 to all the consumers in the country as to what exactly  
5 certified organic means. We really need your help. If we want  
6 new ranchers to transition, we want existing ranchers to  
7 continue and to grow their operations, we are going to need to  
8 see increased demand. Consumers will definitely demand organic  
9 if they better -- better understand why exactly it is so  
10 incredible.

11 CHAIR POWELL-PALM: Amen. We have a question for you  
12 from Logan.

13 BD. MEM. PETREY: Hey, thank you, Lisa. All right,  
14 so this is something we're hearing a lot, and I guess more  
15 recently it's been with the cattle. So, I know cattle may have  
16 a -- a competitor in the grass-fed.

17 Do you think that that is -- having those other  
18 options, is that -- is that -- does that hurt you as far as on  
19 the demand side?

20 MS. WADE: You know, in our specific case, the  
21 Montana Organic Producers Cooperative, we are all grass fed and  
22 certified organic, so we definitely see -- I think the  
23 consumers could see that as like the double whammy, you know,  
24 because people are certainly interested in grass-fed over  
25 grain-fed. I don't think that is a competing factor; I think

1 people get confused about other standards or different  
2 certifying agencies.

3 BD. MEM. PETREY: Yeah, maybe -- seeing it --

4 MS. WADE: Yeah.

5 BD. MEM. PETREY: -- will see grass-fed and they  
6 might think organic or something like that, if it's -- if it's  
7 on the shelf next to it, for example?

8 MS. WADE: Sure, sure. Or people will say, well, are  
9 you certified regenerative egg? Are you certified to treat  
10 your animals humane? And, you know, we always say, well,  
11 actually organic requires all of that, like it's all-  
12 encompassing, but I think sometimes people think organic is one  
13 thing and regenerative egg's another thing, and so I think it  
14 would be -- maybe, you know, I think everybody in general  
15 understands organic is good and it's healthy and people would  
16 like to consume less chemicals in their diet, but they think a  
17 little more simple, specific marketing assistance would be very  
18 helpful and useful to consumers and producers both.

19 BD. MEM. PETREY: Okay. And -- and another question,  
20 follow-up question; so when you said that the growth was  
21 slowed, have you seen a decrease in demand? Or have you seen  
22 no increase in demand recently? What's the trajectory that you  
23 see?

24 MS. WADE: You know, it's probably very specific to  
25 different farms and ranches because some farms and ranches live

1 in a community where they can direct market and they have  
2 enough of a population to do that. But a lot of our producers  
3 live in rural communities where whoever they would market their  
4 beef to already has cows, you know, and so they need to get  
5 plugged into a little bit of a larger distribution market, and  
6 that's where we've struggled, I think, to get the word out and  
7 get the beef distributed beyond the the very small rural  
8 communities with too small of a population for much of a  
9 demand.

10 BD. MEM. PETREY: Sure. Okay. Thank you. Yeah, and  
11 North Florida seems like every other person has a cow, so I  
12 mean it's just kind of --

13 MS. WADE: Yeah.

14 BD. MEM. PETREY: -- here all the time. So, it's  
15 kind of calm, so I understand. Thank you for your time.

16 MS. WADE: Sure.

17 CHAIR POWELL-PALM: No one in Chicago has a cow, and  
18 that's where we need to be sending in some organic beef.

19 Kim, go ahead.

20 BD. MEM. HUSEMAN: Thanks, Nate.

21 Hi, Lisa. I'm curious, do you have any support from  
22 the Montana Beef Council?

23 MS. WADE: I am not aware of that specifically with  
24 our co-op group, or myself as a producer, so I -- I hate to say  
25 they're not doing that, but I just don't see that or I'm not

1 aware of that.

2 BD. MEM. HUSEMAN: Okay. No, that's good to know  
3 because I know in Colorado we -- I -- I work very closely with  
4 the Colorado Beef Council and actually know one of their lead  
5 nutritionists, they do promote that structure, and wonder if  
6 there wouldn't be if not dollars at least a voice in that space  
7 to help with beef production and in the organic space on -- on  
8 more of a statewide footprint. I think it -- it starts local,  
9 right, and, you know, wonder if there's a potential to tap a  
10 resource there, too?

11 MS. WADE: That's a good suggestion. Thank you.

12 CHAIR POWELL-PALM: Great suggestion. Well, thank  
13 you so much for making the time to talk to us today, Lisa. I  
14 really appreciate it. I'm glad -- I know you have an  
15 appointment at the top of the hour, so I'll let you go, but I  
16 think it's just an example of how great it is to be able to  
17 take, again, 10 to 20 minutes out of the day, rather than three  
18 days and a plane ticket, so thank you for making the time and  
19 being able to share your thoughts with us.

20 MS. WADE: Thank you.

21 CHAIR POWELL-PALM: Next up, we've got Mark Smith,  
22 and then we have a caller that we passed up before, Becky Weed  
23 is on -- the on the call, I think still, so let's go Mark  
24 Smith, jump to Becky Weed, and then we'll go to Doug Crabtree.

25 Mark Smith, the floor is yours.



1 MR. SMITH: Okay, I just had to get unmuted there.

2 My name is Mark Smith, and I am a certified organic  
3 producer of beef cattle. My family and I moved up to Montana  
4 to do that very thing way back in 2006. We've been  
5 continuously certified since 2007. Since then, we have been  
6 able to raise a family doing the certified organic business in  
7 beef. And continuous during those -- during that time period,  
8 I continuously found that there is this gaping hole in the  
9 knowledge of what certified organic actually means.

10 I find it to be very distressing, even today, and  
11 when my wife and I were just in the truck coming home from a  
12 delivery the other day, we heard this term come up "Better than  
13 organic," and I thought to myself it's just another way of  
14 trying to -- trying to diminish what organic actually is, when  
15 in fact there's no other explanation of what better than  
16 organic is. In my mind, there is nothing better than organic.  
17 And, indeed, since we started all those years ago with our  
18 program, we've kind of grown up with the program and that  
19 we've -- we've seen the rules change, we've seen the  
20 certification requirements change, and that has been a good  
21 thing that has come along, and the USDA has done a good job at  
22 putting in and clarifying a good program so that we can  
23 continue in the certification.

24 But this thing about "natural," or "just as good as  
25 organic," or some of the other terms that fly around is very,

1 very difficult. Even when I speak to non-certified organic  
2 ranchers, they have misconceptions about what it is and what it  
3 isn't. Chief of which, I think if I can recall, would be that  
4 they think for some reason we can't vaccinate. Well, health  
5 and welfare of animals as we know is in fact one of the chief  
6 concerns that goes into each of our system plans.

7           So, I would just like the USDA, really, to go on an  
8 education rant, if you will, via some sort of -- of program to  
9 educate the public in general. Even our customers. Certainly,  
10 our prospective customers. I find I need to continually draw  
11 the comparison between what certified organic is and what this  
12 natural thing is. So, I would just like to reiterate that we  
13 need to -- to continue to help this organic market grow, even  
14 as it's grown for us, it has been a challenge continuously over  
15 our certification period, what 16 years, to bump our heads  
16 against these misconceptions. And frankly, some of them are  
17 even outright lies about what it is and what it isn't.

18           Well, with that I would thank you for your time, and  
19 if you have any questions I'd certainly like to answer them.

20           CHAIR POWELL-PALM: Questions for Mark?

21 (No response.)

22           CHAIR POWELL-PALM: Really appreciate your -- your  
23 taking the time today, Mark. I know you're probably out  
24 delivering beef somewhere, so doing the work, and isn't it  
25 incredible that we have this platform that allows you to call

1 in and make your voice heard, and not need again --

2 MR. SMITH: Yeah.

3 CHAIR POWELL-PALM: -- take a plane.

4 MR. SMITH: I -- I'm actually out in the middle of  
5 Montana parked, and I am going to do some deliveries, but I  
6 would like to add something to what Lisa Wade just had to say.

7 CHAIR POWELL-PALM: Sure.

8 MR. SMITH: With the -- yeah, with the Beef Council,  
9 here -- here's the deal. I was formerly the administrator for  
10 Montana Organic Producer Co-op. Lisa, I have handed those  
11 responsibilities off to her, but regarding the Beef Council  
12 thing, I am aware of zero effort on the Beef Council's part to  
13 promote organic.

14 Furthermore, there is a mechanism for which organic  
15 producers can be exempt from the \$1 per head check off, and  
16 that was instituted some time ago because and precisely because  
17 the Beef Council was reticent to do anything for certified  
18 organic. They're all about straight on, great big commercial  
19 production of animals.

20 So, I just wanted to add that clarity because I  
21 happen to know that. And if there's any other questions I can  
22 take them.

23 CHAIR POWELL-PALM: Thank you. Just speaking, I  
24 think Jess mentioned it briefly --

25 Well actually, Allison, please go ahead.

1           BD. MEM. JOHNSON: Thanks, Mark. Since you broke the  
2 ice, I haven't wanted to put anyone on the spot, but as  
3 everyone's been talking about marketing, the organic check off  
4 is what has come to mind, and I know there's a lot of concern  
5 with checkoff programs and they haven't worked well for a lot  
6 of organic producers, a lot of smaller producers, but they're  
7 also responsible for the raisin campaign and the "Got Milk?"  
8 campaign, like the things that people think of when they think  
9 of good marketing.

10           So, I'm curious if you as an organic producer, would  
11 be open -- and you don't have to answer this but I'd love you  
12 to, if you're willing -- be willing to have money go into a  
13 shared marketing pot for organic if you see benefit in that?  
14 Because it's hard to imagine USDA funding it although, I think  
15 we should ask them to, so it's one other thing that has floated  
16 in the orbit and I know been controversial in the past.

17           MR. SMITH: Well, I guess since I took the lid off,  
18 and you have to ask a question about it, I'll talk about that a  
19 little bit then.

20           The Beef Council, as you may or may not know, has had  
21 some really egregious malfeasances, if you will, or misuse of  
22 such funds, and for that reason I'm reticent to institute any  
23 new check off that there might be.

24           Having said that, if there is a way that that sort of  
25 misuse of funds could be, oh, ironclad guaranteed to not -- to

1 not happen inside of an organic thing, I would be willing to  
2 consider it, but boy we'd have to have a lot of brains in the  
3 room and really scrutinize, and then put into place proper  
4 accounting audit features with responsibility in order to let  
5 that go through in my mind. So, that's my thoughts on that.

6 BD. MEM. JOHNSON: Thank you for being put on the  
7 spot. Really helpful answer.

8 CHAIR POWELL-PALM: Thanks for bringing that up --

9 MR. SMITH: Okay.

10 CHAIR POWELL-PALM: -- Allison.

11 And I didn't think it was literally that you're  
12 delivering your beef today, so I'm grateful you're feeding --  
13 feeding our community with your great products, so thank you so  
14 much for making the time.

15 MR. SMITH: All right. You're welcome.

16 CHAIR POWELL-PALM: All right, take care.

17 We have a couple of folks that we missed. We're  
18 going to go to Becky Weed, and then Jodi Manuel who's on the  
19 line now, and then to Doug Crabtree.

20 So, Becky, if you're there, please go ahead.

21 MS. WEED: Okay. Are you hearing me?

22 CHAIR POWELL-PALM: We can. Yes.

23 MS. WEED: Okay. Thank you. Sorry, I'm late, I'm on  
24 the road.

25 You've been hearing from a lot of people who had a

1 lot of really good specific suggestions, and that's vital. I  
2 want to step back a bit and look at promotion in a slightly  
3 different way. I have a dream; someday the right and the left  
4 hands of USDA will not be working cross-purposes, and that is  
5 not a partisan right and left that I'm referring to.  
6 Agriculture has always been a combination of ingenuity and  
7 error that transcends political lines, so that means I seek a  
8 unified vision, and I have no illusions; that doesn't happen  
9 overnight. But the North Star of continuous improvement is a  
10 legitimate target for all of agriculture and really needs to go  
11 beyond the organic terminology from people at USDA and the  
12 farmers that (audio distortion) have been trying to lay the  
13 foundation for this common ground for decades. The most recent  
14 expression of that effort is TOPP. The best foundation will  
15 not grow any structure or flesh if we and the USDA don't have  
16 the pride, the confidence, and humility to promote the  
17 principles of continuous improvement.

18           So, can we agree to promote forms of agriculture that  
19 work with rather than against functional natural ecosystems to  
20 the extent possible? Can we aim towards economic systems  
21 sustainability over the long haul, and aim away from unhealthy  
22 dependence on governmental structures? Can we promote both  
23 food and habitat that is healthy for people and the countless  
24 species we share the earth with? Those are, by the way,  
25 organic principles.

1           And it may be heresy to say this at an NOSB meeting,  
2 but I care less about the labels than I do about the vision. I  
3 can't help but note the irony of the timing of this NOSB  
4 meeting, despite the nonpartisan premise of my comments, I have  
5 to remind myself that we have always lived in an imperfect  
6 agricultural system, just as we have always lived in an  
7 imperfect democracy, that both agriculture and our democracy  
8 must seek a more perfect union and promotion for all the same  
9 reasons. Thank you.

10           I farm with my husband Dave Tyler in southwest  
11 Montana in Belgrade. I also sit on the MOA Board, and I  
12 appreciate the opportunity.

13           CHAIR POWELL-PALM: Thank you so much for making the  
14 time to call in today. MOA is showing up. Appreciate it. And  
15 I have to give a Chair's report next week, Becky, so if you  
16 wouldn't mind just writing that for me I don't think I could  
17 ever say it better than you just said it, so that'd be great.  
18 Really appreciate your time --

19           MS. WEED: I'll try to get it to you.

20           CHAIR POWELL-PALM: -- today.

21           So, we have a few more folks. We are nearing the end  
22 of the day today, folks.

23           And Michelle, is Dana Pearls on? I think we could --

24           MS. ARSENAULT: So, Nate, I don't -- we didn't finish  
25 the list of speakers that were signed up, and Dana's on the

1 Wait List.

2 CHAIR POWELL-PALM: Yeah, just -- just to kind of  
3 give folks a roadmap of going down, if we're gonna add her at  
4 the end.

5 MS. ARSENAULT: Okay.

6 CHAIR POWELL-PALM: Or bump to Thursday.

7 MS. ARSENAULT: Thank you for that. Sorry.

8 CHAIR POWELL-PALM: I think we're doing pretty well.

9 MS. ARSENAULT: Dana is on the Wait List, yes.

10 CHAIR POWELL-PALM: Okay, so we're going to finish  
11 today out with Jody, and then Doug, and then Paul, and then  
12 Dana.

13 So, Jody Manuel, if you're there, please go ahead.

14 MR. MANUEL: Hello, everyone. That's a pretty tough  
15 act to follow with Becky on the line, but I'm just going to  
16 read through some collective thoughts that I had wrote down for  
17 today.

18 My wife Crystal and I are the owners of Progress  
19 Ranch near -- near Havre, Montana. We are a century old  
20 Montana farming ranch that has been certified organic since  
21 2009. We raise a multitude of crops, both annual and  
22 perennial, as well as maintaining a certified organic beef  
23 cattle herd.

24 Our most recent endeavor has been the launch of new  
25 value-added company called Gruff, in which we seek to offer



1 lightly processed food crops from our farm directly to  
2 consumers online, as well as through retail outlets nationwide.  
3 Gruff just became the recipient of the coveted NEXTY Award for  
4 best organic or regenerative product in terms of innovation at  
5 Expo East in Philadelphia. Receiving this award was due  
6 largely in part to the passion and commitment of its founder,  
7 my wife Crystal, regarding consumer education in terms of our  
8 human health as it relates to our food choices.

9           At the core of this educational discussion is the  
10 illumination of the very real aspects of what it means to be  
11 certified organic. These educational efforts have clearly  
12 shown us that the vast majority of consumers have a very  
13 limited perspective pertaining to USDA organic. It seems to be  
14 a widely accepted notion that it is nothing other than a  
15 marketing ploy in order to justify a higher price on the store  
16 shelf. We have found great satisfaction in helping consumers  
17 to understand that there is a very real and meaningful  
18 difference for foods bearing the green and white USDA organic  
19 label.

20           This consumer confusion around USDA organic may be at  
21 its highest level when it comes to beef and dairy products. In  
22 our opinion, there needs to be valiant effort put forth to  
23 promote and highlight the fact that USDA organic truly does go  
24 beyond anything that is labeled as natural, grass-fed, or even  
25 regenerative. It needs to be clearly understood that USDA

1 organic always means GMO free. Consumers need to know that any  
2 animal raised under the NOP is: mandated ample access to  
3 pasture; is free from any non-organic feed, most significantly  
4 GMO feed; has never been given any type of antibiotic, growth  
5 hormone, pharmaceutical antiparasitic treatment; as well as  
6 being raised according to animal welfare standards contained  
7 within the NOP.

8 In addition to the human and animal health aspects  
9 dictated by the NOP, there are also the numerous environmental  
10 benefits that come from livestock systems that use no synthetic  
11 fertilizer, and are often incorporated into organic crop  
12 rotations, thus building the soil, removing atmospheric carbon,  
13 and contributing to clean water supplies.

14 As the thankful recipients of a recent substantial  
15 USDA grant to help launch our company, Gruff, we would humbly,  
16 yet urgently, appeal the USDA Egg Marketing Service to  
17 seriously consider initiating any new programs that would help  
18 to educate and bolster consumer confidence with products  
19 labeled USDA organic.

20 I thank you for this opportunity.

21 CHAIR POWELL-PALM: Thank you for the excellent  
22 timing on that speech. Gosh Dang.

23 Questions for Jody?

24 (No response.)

25 CHAIR POWELL-PALM: Well, first off, I just want to

1 say congratulations, Jody, on that NEXTY Award. I think when  
2 we say how do we get more food into organic mouths, having a  
3 Montana company make an organic cereal brand and win the NEXTY  
4 Award is exactly what we all can aspire to.

5 MR. MANUEL: Right.

6 CHAIR POWELL-PALM: You -- you already said it so  
7 well in -- in many ways for why organic, but when you think  
8 about the investment that you and your wife put into building  
9 your brand on organic, and raising your kids on an organic  
10 ranch, what would be that like take away that you want organic  
11 consumers to know why they should be looking to organic as  
12 worth their -- worth their premium, worth their attention?

13 MR. MANUEL: Well, it -- it's funny because like -- I  
14 felt it was necessary to mention the things that my wife has  
15 been so passionate about over the years because you've --  
16 you've -- we've heard it already over and over just about from  
17 every --every commenter today, Mark just a few minutes ago and,  
18 you know, it's like the gang's all together again today, but  
19 we've been having these conversations for years about the  
20 frustrations, about the lack of education, and the lack of  
21 knowledge with what it means to be organic, and so that's --  
22 that's one thing we have set out to do with this new endeavor.  
23 And literally, you know, in our hometown it's just -- it's  
24 common, it's -- it's a common sentiment that USDA organic  
25 literally means nothing. It just means it's more expensive and

1 that's -- that's it, and that's --

2           So that, I guess, the first step is helping the  
3 people that -- that are basically at Ground Zero and don't know  
4 anything to understand that yes, it's -- it's free from all of  
5 the prohibited substance. I think you can get to a level of  
6 consumer that -- that has that -- that concept down, but they  
7 don't understand that also contained within -- within the NOP  
8 are all of the soil building practices and animal welfare  
9 practices that seem to be, I think it got earlier -- earlier  
10 mentioned today maybe by Lisa, that with all of these other  
11 certifications, it -- it promotes the idea that organic doesn't  
12 cover those things such as animal welfare and soil building  
13 practices. So, I guess the -- to answer your question, the one  
14 take away that I would like to -- to leave in people's minds is  
15 that -- that the National Organic Program does, in fact, cover  
16 all of these bases that that all of the other certifications  
17 individually seek to attain.

18           CHAIR POWELL-PALM: Thank you. I love that, and I  
19 couldn't agree more. Allison has a question for you.

20           BD. MEM. JOHNSON: Yeah. Thank you so much for being  
21 here, Jody.

22           I'm curious to hear a little bit more about your  
23 product development process and what you found was available to  
24 help you develop this new product line and what resources you  
25 could have used or would have helped you through the process

1 more easily? Kind of similar to the questions I was asking  
2 Timeless earlier.

3 MR. MANUEL: Sure. Well, I -- I'm not sure how good  
4 of an answer I'll be able to give you today because we are  
5 literally at the ground level, just -- just getting started,  
6 and as I briefly mentioned in earlier comments, you know, we  
7 did apply for grant through the Rural Development Office for a  
8 Value-Added Producer Grant. That, of course, was instrumental.  
9 You know, I don't think we could have done it without that.

10 So, in that process, if we were ever to do that  
11 again, I mean, we -- we've learned so much, not only in the --  
12 in the grant application, but post-award; just things that we  
13 would be able to do more efficiently next time for disbursement  
14 and things like that.

15 As far as other tools and resources, like I said,  
16 we're -- we're -- well, there's an organization in Montana  
17 called Mission West, that's a nonprofit organization that --  
18 that that helps businesses like ours with just like such a wide  
19 range of things, from packaging and processing to nutrition  
20 label design, and -- and requirements and, about I mean  
21 anything you can imagine.

22 The Montana Department of Agriculture has been  
23 instrumental where we -- we just attended the Montana Food and  
24 Beverage Show in Missoula yesterday, and I just, you know,  
25 they're -- they're bending over backwards to -- to help in any

1 way that they can. Bear Paw Development in Havre has been  
2 really great, as has Snowy Mountain Development in Lewistown.  
3 You know, they're just local business development companies and  
4 we're really thankful to have them helping us along the way, as  
5 well.

6 BD. MEM. JOHNSON: Thank you. And congratulations.  
7 Exciting.

8 MR. MANUEL: Thank you. I hope I answered your  
9 question okay.

10 BD. MEM. JOHNSON: Yeah, it was great. I appreciate  
11 it.

12 CHAIR POWELL-PALM: Kim has a question for you, and  
13 then Jerry.

14 BD. MEM. HUSEMAN: Thanks, Nate.

15 And thank you, Jody, and congratulations. Very  
16 excited for -- for you and your wife, and that's -- that's an  
17 amazing award, so I want to start there.

18 As we talked about marketing and the way to reach  
19 people, the Internet obviously has connected people outside of  
20 your local geographic region, outside of the state, et cetera,  
21 et cetera, and this might be a little elementary, maybe I just  
22 don't know, I'm just curious though, have you had any barriers  
23 to entry, like from a broad brush platform standpoint to sell  
24 your products? Or do you find like it has to be zoned into one  
25 particular facility to not hamstring your operation? I --

1 what -- I'm just trying to open up that door to see if there's  
2 any -- anything from the -- the online marketing that could be  
3 done?

4 MR. MANUEL: Oh my goodness. Oh --

5 BD. MEM. HUSEMAN: What -- staying within a minute,  
6 so time.

7 MR. MANUEL: So, the name of the company, Gruff, it's  
8 based on the folk tale of the three Billy Goats Gruff and the  
9 Troll, and we -- what we -- you know, what Crystal and I -- we  
10 just automatically assume that everyone would be as familiar  
11 with that story as the people are with Goldilocks and the Three  
12 Bears, and we found that's simply not true. It's --it's maybe  
13 half of people we come across, so there may be people on this  
14 call that don't know, have any idea what I'm talking about, but  
15 not having really time to go into the story, there's a troll  
16 that stands on this bridge and -- and you know, the goats want  
17 to get across to the other side where the good food is and they  
18 hatch this plan; that's the premise behind Gruff. And so, it's  
19 like this metaphor for so many things, but it -- it kind of  
20 comes down to this broken industrial food system and that's  
21 what we're -- we're wanting to be a small part of helping to --  
22 to fix or to get around. And -- and one of those things that  
23 I -- that I -- one of the things that's become the troll for us  
24 since we've jumped into this, not having a clue what we're  
25 doing, it's this whole world of retail and distributors and --

1 and brokers and, you know box store chains. When we -- when we  
2 very first started the goal was to just do online direct to  
3 consumer, and we -- we weren't even thinking about anything  
4 else, but then through an unforeseen chain of events that had  
5 to do with another Montana company called Cream of the West,  
6 it -- it led us into that world of brokers and distributors and  
7 retailers, and so we're learning how to navigate that as we --  
8 as we go.

9           So, I guess, I'm not sure If I can give you a great  
10 answer today, but I -- but I would like to say that we would  
11 love to be available in the future to -- to help anyone along  
12 the way with what we've learned through this process, and --  
13 and we're hoping by the end of it all that -- that we're able  
14 to knock the troll off the bridge and -- and everyone can cross  
15 freely.

16           BD. MEM. JOHNSON: I like your story. Thank you so  
17 much, Jody.

18           MR. MANUEL: Thank you.

19           CHAIR POWELL-PALM: Jerry, go ahead, and then we're  
20 going to actually finish up today with Doug, and then Paul, and  
21 then recess, and we'll reconvene on Thursday.

22           So, Jerry, please go ahead.

23           BD. MEM. D'AMORE: Okay. Well, Jody, I like the  
24 story, too, and yes, I -- I know that story and have known it  
25 for many, many years. I -- I'm -- I'm wrestling with the -- a



1 number of the callers today that have a -- a very common theme.  
2 We've identified trends and themes, and -- and it strikes me  
3 that -- and I've heard it said for many of you, that -- does  
4 there have to be a comparison? Does there have to be better or  
5 worse? Is there, you know, what -- you know, how do we -- how  
6 do we grapple with our message, basically? And, you know, I've  
7 been look -- thinking about this since 1980, and -- and for me  
8 there -- there the label is first and foremost a guarantee.  
9 It's a guarantee and a contract between a producer that's  
10 willing to put more effort into it, and a consumer that's  
11 willing -- willing to pay a little bit more for that -- for  
12 that effort. And -- and I think the thing that frustrates me  
13 most in listening to all of you is when you try to tell your  
14 story you run into to roadblocks, and I think some of you run  
15 into moral roadblocks of not wanting to tear down something  
16 just to build yourself up. I hear that, too.

17           So, I -- the story that I think is most compelling  
18 can be very, very gently told about this organic seal, which is  
19 it is the only thing that has the teeth in it for enforcement.  
20 It's the only thing that is regulated to a gnat's rearend,  
21 and -- and that can be quoted and demonstrated and -- and  
22 followed up upon.

23           So, you -- in my mind it has a lot of value that does  
24 not have to start with better or worse; it just starts with  
25 a -- a contract that guarantees certain performance and that

1 nobody else has. We talk regenerative, sustainable, on and on  
2 and on, nobody else; you just look at them and ask this very  
3 simple question, how do you guarantee that what you're  
4 representing can be enforced? And -- and so. And that's why  
5 there's so much of a -- of a coming together between the  
6 organic label and the other labels, because their coming into  
7 the organic label gives them the -- the teeth of the organic  
8 label for all that they do.

9 So, again, I -- I'll stop with this; is it doesn't  
10 have to be in the face good and bad; it just has to be with  
11 performance, and -- and what's -- and what is actually real.

12 MR. MANUEL: Amen.

13 BD. MEM. D'AMORE: So, thank you. I've loved  
14 listening to all of you today.

15 MR. MANUEL: I hope that I did not come across in  
16 that -- in a negative fashion that way, because like --

17 BD. MEM. D'AMORE: Not -- not at all. You -- but  
18 there's a whole bunch of you that have the same frustrations.

19 MR. MANUEL: Yeah.

20 BD. MEM. D'AMORE: So, I'm -- I'm taking a collective  
21 frustration with what does this mean? Well, it literally means  
22 not much. It has a definition, but it has no enforcement  
23 capability. And I -- I don't want to -- you know, I don't want  
24 to be a pain in the neck on that, it's just that this organic  
25 this -- organic seal's got a long history and one that's been

1 shepherded, I think, extremely well, and it does have a lot of  
2 value. You just have to know how to present it. So, thanks.

3 MR. MANUEL: Okay, thank you.

4 CHAIR POWELL-PALM: We really appreciate your time  
5 today, Jody. Thank you so much for joining us and for your  
6 good work.

7 We're going to jump to Doug Crabtree, followed by  
8 Paul Neubauer.

9 MR. CRABTREE: Okay, well it's -- it's great to see  
10 so many friends on this call, on both sides of the screen.

11 So, my name's Doug Crabtree, and my wife Anna and I  
12 steward approximately 12,500 acres up here in North Central  
13 Montana. We have a diverse cropping operation. We grow to  
14 different crops any given year. Also, a little newer to us a  
15 small highland cattle fold, and a custom grazing enterprise  
16 that that Paul will tell you more about, but we're integrating  
17 cattle grazing into our cropping system. Our operation has  
18 been certified organic from the start, since we bought the  
19 first land in 2009.

20 In addition to organic crop and livestock production,  
21 we also -- primarily my wife Anna, has started a nonprofit  
22 called the Bellicus Institute, that's dedicated to training and  
23 incubating new agrarians, developing associative economy around  
24 food and farming, promoting agroecological learning, and  
25 supporting the union of arts with agriculture. Through this

1 institute, we've hosted more than a dozen apprentices over the  
2 past several years.

3           Organic has grown to over a \$60 billion industry,  
4 from starting at less than one billion when the standards were  
5 established. This is a great accomplishment considered that  
6 there has never been a check off program or any other  
7 significant promotion coming from USDA. I'm encouraged that  
8 the Transition Partnership Program will -- will help us  
9 transition additional farmers, hopefully a good number, and  
10 that there is some grants that are helping organic businesses  
11 improve processing infrastructure. We're -- we're proud to to  
12 be an applicant for those. But really the only way to ensure  
13 that -- that this industry continues to grow is to make sure  
14 that the demand keeps up, and to do that we need education and  
15 promotion.

16           We would like to see the USDA launch some programs to  
17 help educate consumers as we've been discussing what organic  
18 really is, because as everyone has -- has said, and I see it as  
19 well, there's a lot of misinformation. I believe it's only  
20 fair that organic farmers receive our fair share of -- of USDA  
21 investment in marketing education. While we've grown the --  
22 the organic movement without that kind of support, at this  
23 stage we need and deserve our share to move forward. All the  
24 great attributes of the seal need to be in every school, on  
25 every store shelf, and anywhere the USDA is helping folks be

1 informed. So, thank you again for this opportunity.

2 CHAIR POWELL-PALM: Thank you so much. I realize you  
3 are still in harvest, Doug. Lots of farmers are still  
4 harvesting, so again to be able to make your voice heard I  
5 really appreciate you taking the time out of your day. It's  
6 really, really important.

7 Questions for Doug?

8 (No response.)

9 CHAIR POWELL-PALM: All right, we really appreciate  
10 your time today, Doug. We're going to jump to Paul and hear  
11 about this grazing business you mentioned.

12 Paul Neubauer, if you're on, please go ahead.

13 MR. NEUBAUER: I am here, thank you, Nate.

14 So, Doug mentioned that we work together, and in fact  
15 we do. I serve as the assistant manager at Bellicus Farms in  
16 northern Montana, and I also have my own custom grazing  
17 business that's closely integrated with the farm operations  
18 called PN Custom Grazing.

19 So, my name is Paul Neubauer, and I'm not from  
20 Montana originally; I actually grew up in Buffalo, New York and  
21 I'm a first-generation farmer and rancher. I have been working  
22 in organic farming and ranching from the very beginning of my  
23 experience more than a decade ago. So, I do not really know  
24 how to do what I do any other way than with organic methods,  
25 and with an organic philosophy in mind. And that's shaped a

1 lot of the decisions I've made over my career and where I've  
2 gone and who I choose to assist with, Doug and his wife Anna,  
3 being chief among those people.

4 I also have a bit of a sideline that isn't paid,  
5 unfortunately, comes mostly from my ethics and dedication to a  
6 better rural livelihood for myself and all of my neighbors. I  
7 have a bit of a sideline as the president of the Montana  
8 Premium Processing Cooperative, which is based here in Havre,  
9 and is a project created in close cooperation with the Montana  
10 Farmers Union. And then I also serve as president for my  
11 Montana Farmers Union Local, and many times now as a delegate  
12 to the National Farmers Union Convention.

13 I think that my ability to enter agriculture as a  
14 first-generation producer is really closely linked to the  
15 existence of the certified organic label and the creation of  
16 the markets that certified organic production practices makes  
17 possible. Like I said, I've only ever been in organic  
18 operations and the ones that I see which have opportunities for  
19 new and aspiring agricultural producers to join in, to find a  
20 foothold in agriculture tend to be organic. I can't really  
21 speak to why that is exactly, except to say I suspect it's  
22 because there's greater opportunities because of the organic  
23 premium.

24 I'm also here not just to talk about how much I love  
25 organic agriculture, or how important organic certification and

1 the label is to me, but also to describe or rather point out  
2 that the organic community needs to build a wider network and  
3 keep its eye on the prize, which is that a rural America that  
4 works for everyone in a food system that heals the land is best  
5 for organic producers, as well as the consumers of organic.

6 Geez, that beep is intimidating. I didn't hear that  
7 before.

8 CHAIR POWELL-PALM: Go ahead and finish up if you got  
9 it.

10 MR. NEUBAUER: Yeah, sure. Thank you, Nate.

11 The point being, you know, my -- my involvement in my  
12 agricultural community is not just with organic producers with  
13 the Montana Organic Association, but also with the Farmers  
14 Union, which represents far more than just our organic  
15 producers. And organic can't just be an intellectual exercise  
16 that nonprofit employees debate to compete for donations;  
17 organic is a system that gives us all a shot at rural  
18 sovereignty. If we adhere to a well-considered written set of  
19 standards, and for which there is a premium market, organic  
20 represents the chance to reclaim the dream to farm and make a  
21 good living doing it, which is exactly the mission of the  
22 Farmers Union.

23 And organic is just a piece of the puzzle. There's a  
24 few aspects of work happening right now in the agricultural  
25 sphere that organic producers can align with to build coalition

1 politically and socially, and also to make these projects more  
2 possible. So, some specifics there would be the Right to  
3 Repair Movement, country of origin labeling, movements for  
4 cooperative marketing, and having -- finally having the USDA  
5 spend money educating consumers about what organic is.

6 That's it. Okay, I've done it.

7 CHAIR POWELL-PALM: Thank you so much, Doug and Paul,  
8 and all the farmers, top to bottom. I think this might be the  
9 most farmers we've ever heard from in a single day, and that's  
10 saying something, so thank you for taking the time and making  
11 your voices heard. Really appreciate it.

12 And I'm excited about what -- what this throughline  
13 might mean; how do we get that -- the word out about organic  
14 and grow this demand to make opportunities for more farmers?

15 That's it folks for the day. What a good day. We  
16 are going to do it again on Thursday.

17 Michelle, any closing remarks or -- or logistics for  
18 the -- for everyone online?

19 MS. ARSENAULT: Just that -- yeah, Andrea is getting the slide  
20 up. We are meeting in the same place, at the same time on  
21 Thursday. My -- I really want to say it, same Bat time, same  
22 Bat channel, on Thursday. The same link that you used today to  
23 log in will work on Thursday, as well. And thank you for  
24 joining us.

25 Great job, Nate. Great job, Board. Thank you so



1 much.

2 CHAIR POWELL-PALM: Thank you everybody. Fantastic  
3 working with you. See you on Thursday. Take care.

4 (Whereupon, at 5:28 p.m. the webinar was adjourned until  
5 Thursday, October 19, 2023, at 9:00 a.m.)

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CERTIFICATION

This is to certify that the attached proceeding  
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: FALL 2023 ORAL COMMENT WEBINARS

PLACE: Zoom for Government Webinar

DATE: October 17, 2023

was held according to the record, and that this is the  
original, complete, true and accurate transcript, which has  
been compared to the recording accomp<sup>l</sup> hearing.

*Elaine M. LaRosee*

\_\_\_\_\_

Elaine M. LaRosee,  
Official Reporter

	117:13	44:2;45:7;47:8;	60:20;62:20;63:11;	82:12
<b>\$</b>	<b>absence (1)</b>	142:12;163:10;	69:3;71:16;74:12;	<b>administration (1)</b>
	122:23	166:15;184:22	83:8;100:15,17;	127:19
<b>\$1 (1)</b>	<b>absent (3)</b>	<b>acknowledged (1)</b>	136:24;139:24;	<b>administrative (1)</b>
203:15	11:17;39:11;126:15	150:1	144:21;145:10;	166:8
<b>\$1,000 (1)</b>	<b>absolute (2)</b>	<b>acknowledgement (2)</b>	148:15,20;150:23;	<b>administrator (2)</b>
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<b>1.16 (1)</b> 65:17	200:17	165:4	<b>8.5 (2)</b> 101:19;102:21
<b>1:00 (1)</b> 40:1	<b>20,000 (1)</b> 23:20	<b>340 (1)</b> 168:19	<b>80 (1)</b> 82:21
<b>10 (9)</b> 19:12;34:13;74:10; 145:25;149:20; 157:10;173:2,4; 200:17	<b>2004 (1)</b> 195:22	<b>35 (1)</b> 160:10	<b>80's (1)</b> 157:16
<b>10,000 (1)</b> 129:20	<b>2006 (1)</b> 201:4	<b>37 (1)</b> 184:15	<b>8th (1)</b> 65:7
<b>100 (2)</b> 25:10,11	<b>2007 (1)</b> 201:5	<b>4</b>	<b>9</b>
<b>100/ppm (1)</b> 121:14	<b>2009 (2)</b> 208:21;219:19	<b>4 (3)</b> 73:7;169:21;171:6	<b>9:00 (1)</b> 225:5
<b>10-pound (1)</b> 160:17	<b>2012 (1)</b> 40:6	<b>4.4 (1)</b> 65:18	<b>90 (1)</b> 82:21
<b>12 (1)</b> 145:25	<b>2013 (1)</b> 40:6	<b>40 (5)</b> 22:25;23:3;52:14; 72:8;98:24	<b>90-plus (1)</b> 114:8
<b>12- (1)</b> 30:20	<b>2014 (1)</b> 40:6	<b>5</b>	<b>90's (1)</b> 120:20
<b>12,212 (1)</b> 65:17	<b>2016 (1)</b> 178:22	<b>5:28 (1)</b> 225:4	<b>95 (1)</b> 38:11
<b>12,500 (1)</b> 219:12	<b>2017 (5)</b> 58:15;63:5,11; 104:19;127:8	<b>50 (3)</b> 22:25;23:3;52:14	<b>99 (1)</b> 101:5
<b>12:00 (1)</b> 4:2	<b>2018 (3)</b> 77:2;122:18;126:10	<b>50,000 (1)</b> 145:24	
<b>12-month (2)</b> 28:24;31:16	<b>2020 (2)</b> 173:3,5	<b>50,000-acre (1)</b> 172:18	
<b>137 (2)</b> 59:13;61:6	<b>2023 (6)</b> 65:11,16;67:16; 161:23;162:19;225:5	<b>500 (1)</b> 192:15	
<b>140 (1)</b> 168:18	<b>2024 (4)</b> 60:5;68:11;123:25; 129:10	<b>542 (1)</b> 65:18	
<b>15 (4)</b> 92:24;93:5;160:11; 173:2	<b>20th (1)</b> 68:11	<b>55 (1)</b> 169:12	
<b>150 (1)</b> 168:18	<b>2-1/2 (1)</b> 106:22	<b>56 (1)</b> 144:13	
<b>16 (1)</b> 202:15	<b>2119m (2)</b> 87:4;88:19	<b>6</b>	
<b>1600 (1)</b> 26:21	<b>22 (2)</b> 127:8;144:17	<b>60 (1)</b> 104:18	
<b>17 (1)</b> 146:4	<b>2500 (1)</b> 192:13	<b>605 (8)</b> 34:17,21;35:14; 36:12;37:11,16;39:6, 11	
<b>17th (1)</b> 122:17	<b>25b (2)</b> 60:25,25	<b>61 (1)</b> 4:7	
<b>18 (1)</b> 146:4	<b>2611 (1)</b> 47:22	<b>7</b>	
<b>19 (1)</b> 225:5	<b>2611-1 (1)</b> 44:17	<b>7 (1)</b> 167:1	
<b>1980 (1)</b> 217:7	<b>2613 (1)</b> 44:12	<b>7.2 (1)</b> 101:20	
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<b>2</b>	<b>30 (5)</b> 26:22;28:19;50:7; 90:23;184:15	<b>8.2 (1)</b> 102:19	
<b>2:00 (1)</b> 40:1	<b>30th (1)</b> 122:19	<b>8.4 (1)</b> 101:19	
<b>20 (4)</b> 19:12;58:19;90:23;	<b>32 (1)</b> 161:23		
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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2023 ORAL COMMENT WEBINARS

Thursday,

October 19, 2023, 12:00 p.m., EST

Held via Zoom for Government Webinar

1 National Organic Standards Board (NOSB) Members

2

3 Nate Powell-Palm, NOSB Chair

4 Mindee Jeffery, NOSB Vice Chair

5 Amy Bruch, NOSB Secretary

6 Brian Caldwell

7 Jerry D'Amore

8 Carolyn Dimitri

9 Kim Huseman

10 Allison Johnson

11 Kyla Smith

12 Nate Lewis

13 Dilip Nandwani

14 Logan Petrey

15 Franklin Quarcoo

16 Wood Turner

17 Javier Zamora (absent)

18

19

20

21

22

23

24

25

1 USDA/National Organic Program staff

2 Michelle Arsenault, Advisory Committee Specialist

3 Erin Healy, Division Director of Standards

4 Jared Clark, National List Manager, Standards

5 Andrea Holm, Agricultural Marketing Specialist, Standards

6 Johanna Mirenda, Agricultural Marketing Specialist,

7 Standards

8 Heather Kumar, NOSB Technical Support Staff

9 Esu Obu, NOSB Technical Support Staff

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

(Time: 12:00 p.m.)

1  
2  
3 MS. ARSENAULT: All right. Welcome, folks. I have  
4 the top of the hour. 12 o'clock. Welcome to Day 2 of the  
5 National Organic Standards Board public comment webinars.

6 If you're online with us, you should see an  
7 instruction slide with some instructions for attendees and  
8 speakers. If you're only on the phone with us, I'm going to  
9 summarize the slides so you can know what's going on over here.

10 The chat is enabled. You'll find that in the center  
11 of your Zoom task bar, so you can chat with each other or relay  
12 technical difficulties. But the chats are not part of the  
13 public record, and are not a public comment, the board members  
14 will not be answering questions in the chat, nor will the  
15 program unless it's technical in nature.

16 The closed captioning is available in Zoom by  
17 clicking the live transcript button, which is on your Zoom  
18 taskbar, somewhere in the middle. You can control your own  
19 view and font size. You can turn it off or on if you didn't  
20 want to see it either.

21 Please do not use the raised hand feature. All  
22 commenters registered ahead of time and will be called on in  
23 turn. You can customize your own view in Zoom. So you can  
24 rearrange what you see on your personal screen. If you go to  
25 your -- the upper-right corner, you'll see a view button. You

1 can usually toggle between gallery view and speaker view.

2 And also a little tip when we share a PowerPoint  
3 slide. If you click exit full screen, it will minimize the  
4 Zoom window so you can actually get to other things on your  
5 desktop. It won't take over your entire screen.

6 And don't worry, changing your screen isn't going to  
7 affect anyone else's. We won't be able to see what you're  
8 doing over there.

9 We're going to spotlight the speaker timer for  
10 everyone on the screen. That will be in my Zoom tile. So that  
11 should remain on your screen no matter what view you're using.  
12 If you're having technical problems, please visit  
13 support.Zoom.US. You can chat with them, call them, email them  
14 to get things taken care of. Generally, if you log out of Zoom  
15 and back in, it fixes all the problems that you may be  
16 experiencing.

17 The webinar is being recorded, and I'll start the  
18 recording shortly. Actually, why don't I just start it now  
19 while I'm thinking about it.

20 All right. So we are recording. And we'll also have  
21 transcripts after the in-person meeting ends next week and we  
22 need a couple weeks to get the transcripts. We'll post them on  
23 the NOP website for you.

24 All right. Slide 2 for speakers. Please make sure  
25 that the name displayed in your video tile is correct so we can

1 locate you when it's your turn to speak. You should be able to  
2 rename yourself by clicking the participant's list. There's  
3 three dots next to your name under more. And do keep an eye on  
4 the chat box. If you're scheduled to speak and we can't find  
5 you in those participants, we may chat to make sure -- so you  
6 can confirm for us that you're on the line.

7           Sometimes if you call in on the phone, it doesn't  
8 connect your name to your phone number, so we may have  
9 difficulty finding you if you didn't give me your phone number  
10 when you registered.

11           We'll ask each commenter to unmute when you're called  
12 upon so you can -- you'll get a pop-up message on the screen  
13 that says the host has asked you to unmute yourself. So please  
14 unmute yourself, turn your camera on if you want. That's  
15 optional. You don't have to be on camera. Both the mic and  
16 the camera are in your Zoom task bar in the lower left side, if  
17 you have trouble finding it.

18           If you're on the phone only and you don't have a mute  
19 button on your phone, you can hit star 6, and that will toggle  
20 between mute and unmute. When you come to the mic after Nate  
21 calls your name, and we get you unmuted, you're going to state  
22 your name and affiliation for the record at the start of your  
23 comment so the transcriptionist who is on the line with us can  
24 capture that.

25           Each commenter will have three minutes to speak, and

1 we'll use a timer that will sound when your time is up. When  
2 you hear the beep, please finish your sentence. The timer,  
3 again, will be visible in my video tile on the screen at all  
4 times.

5 I'm going to test the timer here for you guys, see if  
6 you can hear it. I know you can't see it at the moment, but  
7 did everyone hear that beep? Okay. I got mixed reviews  
8 yesterday -- on Tuesday. Some people could hear it and some  
9 people didn't hear it at all.

10 All right. Now I'm going to turn the mic over to  
11 Erin Healy, who is the director of the Standards Division at  
12 the National Organic Program to officially call the meeting to  
13 order. Erin.

14 MS. HEALY: Thank you, Michelle. Hello.

15 Today is a continuation of our two-day public comment  
16 webinars. So welcome back to those who attended on Tuesday.  
17 And welcome to those who are attending for the first time  
18 today.

19 We are very grateful to be able to hold these  
20 sessions virtually. It allows for people to attend from  
21 wherever they are. To our public commenters, thank you for  
22 engaging in this process that shapes policy. It's always  
23 exciting to see democracy in action. I also thank our  
24 audience. You are an important part of the public meeting  
25 process.

1           After today's webinar, we will meet in person next  
2 week in Providence, Rhode Island. We do plan to livestream  
3 that meeting, as we did last spring. Meeting access  
4 information for all meeting segments is posted on the NOSB  
5 meeting page on the USDA website. And transcripts for all  
6 segments will be posted once completed.

7           This meeting, like all meetings of the National  
8 Organic Standards Board, will be run based on the Federal  
9 Advisory Committee Act, as well as the Board's policy and  
10 procedures manual. I will act as the designated federal  
11 officer for these webinar segments. And Nate Powell-Palm, our  
12 Board Chair, will facilitate the session.

13           We remind everyone that this is an open and  
14 transparent process, so please do be respectful of each other  
15 and avoid any personal attacks. This extends to the chat  
16 messages as well. So even if you disagree with a speaker's  
17 position, please be sure to provide them the same respect and  
18 grace that you would like for yourself.

19           And to close, I do want to thank the NOP team and  
20 acknowledge all of the hard work that goes into these webinars  
21 and the meeting. So if we could give a Zoom round of applause  
22 to Michelle Arsenault, Jared Clark, Andrea Holm, Joanna  
23 Miranda, and our two new NOSB technical support staff members,  
24 Esu Obu and Heather Kumar.

25           I am always impressed by this team. It's very smart

1 folks who really care about the organic program, and I'm  
2 grateful to work with them every day.

3 So I will now hand the mic back over to you,  
4 Michelle, to do a roll call of the Board members.

5 MS. ARSENAULT: Thank you, Erin. All right. Nate  
6 Powell-Palm.

7 CHAIR POWELL-PALM: Present. Good morning.

8 MS. ARSENAULT: Good morning. Mindee Jeffery.

9 VICE CHAIR JEFFERY: Good morning.

10 MS. ARSENAULT: Good morning, Mindee. Amy Bruch?

11 BD. MEM. BRUCH: Good morning from the Midwest.

12 MS. ARSENAULT: Good morning, Amy. Brian Caldwell?

13 BD. MEM. CALDWELL: Hi, everybody.

14 MS. ARSENAULT: Excellent. Good morning, Brian.

15 Gerard -- Jerry D'Amore.

16 BD. MEM. D'AMORE: Greetings from California.

17 MS. ARSENAULT: Hello, Jerry. Carolyn Dimitri.

18 BD. MEM. DIMITRI: Hi everyone.

19 MS. ARSENAULT: Good morning, Carolyn. Kim Huseman.

20 BD. MEM. HUSEMAN: Present.

21 MS. ARSENAULT: Thanks, Kim. Allison Johnson.

22 BD. MEM. JOHNSON: Hello. Good morning.

23 MS. ARSENAULT: Hello, Allison. Kyla Smith.

24 BD. MEM. SMITH: I'm here. Hi, everybody.

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

1 BD. MEM. LEWIS: Present.

2 MS. ARSENAULT: It was very low volume there, Nate.  
3 There you go. But I see you and I kind of heard you. Dilip  
4 Nandwani.

5 BD. MEM. NANDWANI: Good morning.

6 MS. ARSENAULT: Good morning, Dilip. Logan Petrey?

7 BD. MEM. PETREY: Good afternoon.

8 MS. ARSENAULT: Hello, Logan. Franklin Quarcoo.

9 BD. MEM. QUARCOO: Present.

10 MS. ARSENAULT: Hello, Franklin. Welcome. Wood  
11 Turner.

12 BD. MEM. TURNER: Hey there, good morning.

13 MS. ARSENAULT: Hello, Wood. And Javier Zamora.

14 (No response.)

15 MS. ARSENAULT: All right. I note Javier is absent.  
16 And, Nate, I think that conducts all of the administrative  
17 duties, and I will hand the mic off to you now.

18 CHAIR POWELL-PALM: And it is with great joy that I  
19 will take said mic. Thank you, Michelle.

20 Gosh, I tell you. After last call on Tuesday, I had  
21 to sit for a minute and just reflect on how in this format we  
22 got more farmers to call in in a single day than from what I  
23 hear ever in the history of the Board. And that is just really  
24 cool to think we're moving in that direction, where we have a  
25 platform. We have a format where we are hearing from the folks

1 who are in that supply chain, doing the good work every day.  
2 So I am just so grateful for everyone who called in on Tuesday.  
3 Really looking forward to our speakers to day.

4           And with that, let's just run through a little  
5 housekeeping. So a reminder that there is a policy in the  
6 policy and procedures manual about public comment. Here's your  
7 slide. All speakers who will be recognized signed up during  
8 the registration period. Persons must give their names and  
9 affiliations for the record at the beginning of the public  
10 comment. Proxy speakers are not permitted.

11           Individuals providing public comment shall refrain  
12 from making any personal attacks or remarks that might malign  
13 the character of any individual. I would say we did a fabulous  
14 job of that Tuesday. I don't think we had a minute of  
15 hesitation to really keep it classy. So thank you, everybody.

16           Members of the public are asked to define clearly and  
17 succinctly the issues they wish to present before the Board.  
18 This will give NOSB members a comprehensible understanding of  
19 the speaker's concerns.

20           I will call on speakers in the order of the schedule  
21 and will announce the next person or two so they can prepare.  
22 Please remember to state your name and affiliation and then  
23 we'll start the timer.

24           Board members will indicate to me if they have any  
25 questions, and I will call on them. Only NOSB members are



1 allowed to ask questions.

2           So our first speaker of today is going to be Mike  
3 Dill. Mike, if you are there, thank you for kicking us off  
4 today.

5           MR. DILL: Yeah. And I'm excited to be first and  
6 being the one to kick us off. So good morning, good afternoon,  
7 organic community. My name is Mike Dill and I'm representing  
8 the Organic Produce Wholesalers Coalition, otherwise known as  
9 OPWC.

10           My comments today are on oversight improvements to  
11 deter fraud and supporting transition. With regard to the GPS  
12 proposal, OPWC does not think this proposal creates a strong  
13 fraud prevention practice, but we will not oppose the  
14 recommendation that it be implemented via guidance if the  
15 organic community collectively agrees that it will be helpful.

16           As explained in our prior comments, we assert that in  
17 the fresh produce supply chain, the proposal will do very  
18 little to aid in attracting and verification of organic status  
19 for purchase if it fails, even if the GPS coordinates of  
20 certified fields are made public.

21           If the NOP is to provide guidance to certifiers,  
22 please consider the following perspective, which we elaborate  
23 in our written comment. One, collection of GPS data should be  
24 the responsibility of certifiers, not growers. GPS information  
25 should be recorded via -- or should not be recorded via the

1 organic system plan. Do not use the center of the field as the  
2 marker. Take readings of an identifiable location that is  
3 accessible at all times. Have trained inspectors take GPS  
4 reading on approved devices. And lastly, requires certifiers  
5 to the record field's -- the inspector's visit during their  
6 audit.

7           Related to the discussion about improving support for  
8 transition, we'd like to summarize a few suggestions which are  
9 further explained in our written comments. We suggest defining  
10 the term "transitional land" to differentiate land that is  
11 eligible for certification from land that is in a state of  
12 transition. That is the land that's undergoing biological  
13 changes, such as from an extractive to regenerative state, or  
14 from a sterile soil to microbiologically active soil.

15           Specific to land and crop production, both the Alpha  
16 and NOP regulation only focus on eligibility of land and crops,  
17 whereas the organic community has historically used the concept  
18 of transition to refer to both eligibility and a change in the  
19 agro-ecology of the land through organic management.

20           Second, let's not forget about the early leaders of  
21 the organic movement when we're talking about transition  
22 programs. For more than 50 years, these producers have been  
23 transitioning land, developing organic systems, and producing  
24 organic crops. They forged forward without mentors, federal  
25 grants, technical assistants, and at times without even market

1 support.

2 As these growers begin to step aside or are forced  
3 aside as the market adjusts to an influx of new organic  
4 producers, we suggest that there be technical assistance  
5 related to succession planning, transfer of ownership, and  
6 financial pathways to help them as they transition out of  
7 farming or pass-through operations on new farmers.

8 And last, OPWC asserts that training, mentorship  
9 programs, and technical assistants also be specifically focused  
10 in preparing farmers to take over existing organic farms and  
11 create a system for transitioning farmers themselves, not just  
12 land, as this can help prevent the loss of acres to  
13 conventional management or development. Sorry for going over.  
14 Thank you.

15 CHAIR POWELL-PALM: Nice --

16 MR. DILL: -- logo. Organic is the answer. I love  
17 it.

18 CHAIR POWELL-PALM: I wonder who came up with that.  
19 We'll talk about it just in a second. But, Logan, please kick  
20 us off.

21 BD. MEM. PETREY: Hey. Thanks, Mike. I've got a  
22 question about the transition. Do you -- I'm glad we're  
23 excited about it. We've had a lot of farmers in the previous  
24 day talk about the demand manning an issue. Do you see that as  
25 an issue more on the -- you know, on your side of things? If

1 we expand a lot of growers, we're adding to the supply. What's  
2 your thoughts on demand?

3 MR. DILL: We are very concerned about it, actually.  
4 I'm all for transition support. I'm all for increasing organic  
5 acreage. But I am concerned that we are going to transition  
6 growers and they're not going to have market for those  
7 products.

8 We did a survey of our growers, and remember, we're  
9 talking about fresh produce, specialty crop growers only. But  
10 we surveyed our supply chain last year, and a vast majority --  
11 I mean, we're talking like 40 -- it was like 40, 50 percent  
12 said that they could already grow more than what they're doing,  
13 but the market -- they didn't have markets for it. And then we  
14 also asked --

15 BD. MEM. PETREY: So the current --

16 MR. DILL: Oh, go ahead.

17 BD. MEM. PETREY: So the current organic farmers  
18 would expand their current production if the demand was easily  
19 there?

20 MR. DILL: Yes. They said they're already in a  
21 position where they could produce more. And then a lot of --  
22 we also ask if growers would be interested in expanding their  
23 operations and they said -- it was kind of a mixed bag. Some  
24 said yes, they'd like to. Others said not, they're not  
25 interested. And again, it came back to not having that market

1 to support their, you know, expansion.

2 BD. MEM. PETREY: So the current growth in organics  
3 right now is limited not because of supply, necessarily, but  
4 because of the demand, you would say?

5 MR. DILL: Absolutely. Yeah.

6 BD. MEM. PETREY: Okay.

7 MR. DILL: In produce.

8 BD. MEM. PETREY: Yeah. In produce, okay. Thank  
9 you.

10 CHAIR POWELL-PALM: Great starting with your  
11 question, Logan. Thank you.

12 Amy, please go ahead.

13 BD. MEM. BRUCH: Mike, thanks for your time today.  
14 Thanks for that awesome website. I'm glad Nate is posting that  
15 graphic. That's awesome. And thanks for all of your extensive  
16 written comments. Appreciate the ones on the geo codes. I had  
17 a question on crop insurance. Just to unpackage, you know,  
18 what fruit and veggie growers are experiencing in your area,  
19 you made a written comment about reasons why crop insurance is  
20 not attractive to growers in your region.

21 And you gave two examples. One was diversification  
22 with geographical region. So if one area fails, at least they  
23 have the other, essentially, to fall back on. And then the  
24 other example you mentioned was multiple crops. Again, if one  
25 crop fails, they have an opportunity to grow another crop.

1           You know. I think that's great. The  
2 diversification's great. But do you think if there were  
3 policies that could protect both regions, for example, that  
4 growers would be interested in taking on crop insurance, or if  
5 there was a policy that would cover all the crops that were  
6 grown by your fruit and veggie producers that they'd be  
7 interested? Is it the quality of offerings that's the problem  
8 then that they're self-insuring?

9           MR. DILL: I honestly wish I had more information to  
10 give you. The growers we spoke with had zero knowledge of crop  
11 insurance. It just wasn't something that they dealt with. I  
12 mean, they're really familiar with commercial liability  
13 insurance, and what it takes to get in to work with retailers  
14 and wholesalers, but when it came to crop insurance, they just  
15 -- they weren't familiar with it.

16           And so -- and the feedback we got is, you know, they  
17 are -- they've diversified to kind of hedge their bets and make  
18 sure that they have -- like you said, if something failed, they  
19 have something to fall back on. They have other crops.

20           I did hear two of the growers I spoke with did say  
21 that they would be interested if they knew more, and if it  
22 seemed like it would be more helpful. But I think they just  
23 hear the rumors that it, you know, is not working and so they  
24 just don't even, like, bother with it.

25           So we're in support. We love the direction that

1 you're going. We're really thrilled that you're, you know,  
2 taking this seriously and, you know, have it on the agenda, and  
3 we want to see the conversation to continue. And I'm going to  
4 try even harder in the next, you know, cycle to get some more  
5 information and maybe reach out to less diversified growers  
6 that we're working with.

7 BD. MEM. BRUCH: Uh-huh. Thank you so much.  
8 Appreciate that, Mike.

9 CHAIR POWELL-PALM: Allison, please go ahead.

10 BD. MEM. JOHNSON: Thanks for your comments, Mike.  
11 And, Logan, thanks for leading with that question. Mine is a  
12 follow-up about what we should do to create more markets. I've  
13 heard similar things that organic producers are actually  
14 selling into conventional markets because the buyers don't want  
15 to buy more organic. So I'm curious what you see as  
16 opportunities to grow that demand?

17 MR. DILL: I think food service and institutional  
18 purchasing is an area that we need to get into. Our feedback  
19 for the OMDG, the organic market development grant, when they  
20 did the townhall was to look at institutions and contract, and  
21 see if there's ways to, you know, increase or create some kind  
22 of added fund and budget to, you know, have premium products  
23 such as organic.

24 Retailers, I think we -- they're -- they hold the key  
25 to a lot of this, you know, and I understand from their

1 perspective, they're, you know, promoting conventional and  
2 they're promoting organic. They can't -- you know, they  
3 probably don't want to kill their conventional market by saying  
4 that organic is the answer and you should be buying organic. I  
5 wish they would do that, but I think, you know, it's going to  
6 be hard to grow retail sales. So we're left with institution,  
7 food service, restaurants, and then direct to consumer.

8           But yet, without the retailer support, it's going to  
9 be tough. But I do believe that we need to put more emphasis  
10 on this and really try to educate consumers so that they can be  
11 the ones to pressure the retailers to add more, you know,  
12 organic. Because the retailers will pretty much only respond  
13 to the consumer.

14           CHAIR POWELL-PALM: Other questions for Mike?

15           I'm going to try to be brief because I'll -- I'm sure  
16 we'll talk about this in Providence next week, Mike, but who do  
17 you think -- like where do you think the best consumer  
18 education occurs? When we think about educating consumers on  
19 organic, is it grocery store shelves? Is it school lunch  
20 programs? Where do folks, you know, learn the best about this  
21 and where could we target our energies?

22           MR. DILL: Oh, man. I think we have to hit them  
23 everywhere. I think we need to be in the stores if the  
24 retailers will, you know, allow it. I think packaging is a  
25 good, you know, marketing tool. Unfortunately, you know,



1 produce doesn't have a lot of packaging to do marketing. And  
2 then I just think of, like, the -- kind of the old school  
3 approach of painting trucks, billboards on highways. You know,  
4 some of the basic things that we've walked away from.

5 I heard yesterday they talked about, you know,  
6 bringing back the raisin guy, but I think -- and then Super  
7 Bowl ads. Whatever. I think we just have to -- we have to be  
8 creative. We have to be simple. And we have to look at what's  
9 looking for other folks. And if I look at what the  
10 regenerative community is doing right now, what Jason Momoa and  
11 Woody Harrelson, and all these folks, I mean, I -- we have to  
12 find a spokesperson. We have to find an influencer. You know,  
13 that's -- that's an approach we need to hit up because it seems  
14 to be working for them, and we haven't done it yet.

15 So whoever the next organic influencer is going to  
16 be, I think we need to find them. That should be the next  
17 agenda topic for the NOSB.

18 CHAIR POWELL-PALM: Absolutely. Absolutely.

19 One less exciting question for you. If I heard you  
20 right, you like the GEODOC. And we just need to make sure that  
21 we keep it so that it's all on the certifiers, which it is.  
22 This has nothing to do with farmers. And if we have to make  
23 sure that -- and like all privacy data, it's kept exactly like  
24 we keep all location data now, with the certifier, nowhere  
25 public.

1           MR. DILL: I'm totally fine with that. Yeah. Just  
2 don't go tromping around in the middle of our fields to find  
3 the data point still.

4           CHAIR POWELL-PALM: All right. Well, we really  
5 appreciate your comments today. Thank you so much for heeding  
6 the call of the last many meetings that we need to grow these  
7 things.

8           So the website awesome, Organic is the Answer.  
9 Thanks so much for all your work.

10          MR. DILL: Absolutely. Thank you, Nate. And that's  
11 OPA for all the information that helped us create Organic is  
12 the Answer.

13          CHAIR POWELL-PALM: And I just want to give a shout  
14 out to Mindee's background right now too, because there's some  
15 swag. There's some swag out there that everyone should get.

16          All right. Next up -- thanks, Mike. Appreciate you.

17          Next up we have Phil Vavercek, and then Bryce  
18 Irlbeck, followed by Byron Weimer. Phil, if you are there, the  
19 floor is yours.

20          MS. ARSENAULT: Phil is on the phone -- there we go.

21          MR. VAVERCEK: Can you hear me?

22          MS. ARSENAULT: We can hear you.

23          MR. VAVERCEK: Okay. All right. Yeah. My name is  
24 Phil Vavercek, and I'm a farmer/producer here in eastern  
25 Nebraska, corn, soybeans, and alfalfa is what I'm producing,

1 and I'm going through transition and getting into my first  
2 certified organic crops. This year, we've got a field of corn  
3 that -- I guess I want to talk about insurance is where I'm  
4 kind of going with this, and proving our yields.

5           This year, we had a really good-looking corn crop and  
6 like two, two-and-a-half weeks ago, we had a wind storm come  
7 through, 70, 75 mile an hour reported winds. So obviously,  
8 that -- most of that is down and will be lost. And our county  
9 averages -- like, I apologize if I don't have that in front of  
10 me what they are -- the T-yields that I'll have to be using for  
11 insurance, but it's going to be considerably less than probably  
12 what I need and what I was going to produce.

13           You know, I guess that's kind of holding me back from  
14 transitioning more acres. And it takes so many years to  
15 produce these yields. So many years of corn, and so many years  
16 of soybeans. And I guess part of my concern or frustration is  
17 so this year, the yield is going to be poor, which isn't going  
18 to help me going forward. Next year, I might -- I'll probably  
19 take that field to soybeans, and then I like to yield alfalfa  
20 is what I'm thinking in my rotation.

21           So you know, it's going to be two, three years before  
22 I get back to a corn crop and hopefully can produce a good one  
23 to start proving some yields. And like I said, that's kind of  
24 holding me back from transitioning some other acres that are  
25 conventional right now because I do have such good proven

1 yields and a good insurance base there.

2           And I guess my other concern is using alfalfa. Right  
3 now, I'm just putting hale on that, and it would be nice if  
4 somehow we could, you know, protect the tons that we're  
5 producing year in and year out. I am under irrigation. That  
6 does help. But I do have one farm that is metered and  
7 restricted to nine inches of water per year. That was alfalfa  
8 this year. So the first cute cuttings were good. I'd say the  
9 first and third. The second, fourth, not so good because we  
10 were in a drought area and I had to watch the amount of water  
11 that I was using being limited there.

12           But again, just -- the insurance part of it, trying  
13 to prove those years and -- to have a good base level to go off  
14 of for insurance purposes.

15           CHAIR POWELL-PALM: Thank you. Thank you so much for  
16 your comments. We -- this is a through line. This is a  
17 problem.

18           I'm going to hand off the question first to Amy  
19 Bruch.

20           BD. MEM. BRUCH: Yeah. Phil, thanks for joining us  
21 today. I know you're super busy in the Midwest with harvests  
22 this time of year. Sorry to hear about the wind storm that  
23 happened to you, and sharing the real-life example of what that  
24 means when our insurance doesn't match our output. It really  
25 is impactful.

1           So you mentioned that it's going to deter you from  
2 potentially transitioning acres. Is that mainly due to kind of  
3 the revenue that you were expecting on the farm or what was --  
4 what's the deterrent there for growing your transition?

5           MR. VAVERCEK: Yeah. Exactly. My gross revenue,  
6 exactly. You know, the farms that we're in now, I have good  
7 insurance levels. Obviously, everything that we farm has been  
8 affected by the wind -- our corn, I should say. Soybeans were  
9 done. But yeah, it just -- it makes you think, as you're going  
10 through these fields, you know, it's -- you always want to get  
11 the most you can and you know -- most of these fields were  
12 insured pretty good, but when it comes to the organic, I feel  
13 that I -- you know, I probably would've been better if it was  
14 in conventional, if that makes sense. Just with the county T-  
15 yield being much lower on the organic.

16           BD. MEM. BRUCH: Uh-huh. And what would be your  
17 ideal to transition? How many acres are you still looking to  
18 maybe add in if -- you know, over time?

19           MR. VAVERCEK: Sure. No. I'm at 500 now, you know.  
20 And ideally, it'd be nice to double that, to do another 500 in  
21 the near future. But it makes you think, going through a  
22 process like this right now.

23           BD. MEM. BRUCH: Yeah. Sorry, Phil. Sorry to hear  
24 that. Thanks for sharing your comments, though. I appreciate  
25 that.

1 MR. VAVERCEK: Yeah. No. Thank you for the time,  
2 and listening, and yeah, I appreciate everything that you  
3 members do on the Board and the support. So thank you

4 CHAIR POWELL-PALM: Thank you. We are working on  
5 this. So really appreciate you taking the time to talk to us  
6 today. We're inching towards some solutions. SO please keep  
7 calling in and sharing your stories with us because this is how  
8 we make change. Thank you, Phil.

9 MR. VAVERCEK: Sure. Thank you. Have a good day.

10 CHAIR POWELL-PALM: Next up, we have -- thank you.  
11 Have a good day.

12 Next up, we have Bryce Irlbeck, followed by Byron  
13 Wiemer, and then Bill Wolf.

14 MR. IRLBECK: Thank you, Nate. Yes. My name is  
15 Bryce Irlbeck, and I farm organically in Iowa, and I run an  
16 organic certification process with the software that we  
17 developed.

18 I've spoken on here a few times, so I want to say  
19 thank you to everyone that is doing this because I know it's a  
20 lot of time. It's a lot of commitment. And you're most likely  
21 doing it for free. So thank you.

22 Today, I want to talk about two things. Number one,  
23 being the imports that are coming in; and number two, just  
24 being -- talking through the investments into organic and what  
25 we're doing as a collective group. So as mentioned probably by

1 future speakers and prior speakers, the suspected fraudulent  
2 imports allowed by essentially us, because we're not doing  
3 enough to stop it as a group, or to understand what's going on,  
4 have real life effects on the farmers. And this comes from a  
5 lack of oversight. If you want to find the ports with the most  
6 lax regulations, and they're all different regulations, you're  
7 going to go to the ones that organic are coming in.

8           The lack of control, as an organic farmer, I have to  
9 bring back my grain all the way to the end user, and it's very  
10 hard to even find where a lot of this grain is coming from,  
11 countries of origin, and then just a lack of common sense for  
12 us.

13           It's -- we're importing millions of bushels of Brazil  
14 over the last couple of months, and nobody's really asking  
15 questions about it, it seems, from our level. So it's all of  
16 us as a collective, organic group that need to step up and do  
17 that. Or we are and will lose more farmers in the organic  
18 space. It's costing a lot of money to about break even to lose  
19 money too, for a lot of hard work for the Midwest farmers, and  
20 I speak for grain farmers because that's what I am. I don't  
21 know the veggie space or anything else like that.

22           So it is severely impacting people, and they are  
23 taking a hard look at being able to produce this for people to  
24 eat. So as a farmer, then as a processor, as we're selling  
25 grains, it is becoming evidence the processors are bearing a

1 lot of this too, and I worry about processing staying open,  
2 staying viable in the long run with a lot of this stuff that's  
3 coming in through the ports. They have been told by a few it's  
4 easier to idle them. They lose less money just idling them and  
5 not running any organic in the Midwest than it is running the  
6 few that they can.

7 Imports is a very near and dear to our hearts, and  
8 it's something that I think we should all take seriously as a  
9 group, and the NOSB Board help take the lead on that.

10 The last two things that I have, or the last thing is  
11 the investments into organic. And I read lately that the hemp  
12 industry has about \$15 billion from the USDA that goes into the  
13 -- helping the hemp industry, and that's a \$5 billion industry.  
14 We have a \$7 billion industry in organic and we get roughly 15  
15 to \$20 million.

16 So as a group, and as an NOSB Board, I think you  
17 know, looking at the cost-share programs at \$750 an acre,  
18 again, I don't want to put down the \$750, but we need to be  
19 effectively using our money better and our time better to get  
20 more of those resources that should be out there for the  
21 organic producer, and the organic standards, and the organic  
22 enforcement.

23 So take broad overall strokes, but that is what I'm  
24 feeling today and the about 50 growers I work with sentiments  
25 too are feeling.



1 CHAIR POWELL-PALM: Thank you very much for your  
2 comments and taking the time to talk to us today. We realize  
3 it's a busy time of year for you.

4 Questions for Bryce? Logan's got one, followed by  
5 Amy.

6 BD. MEM. PETREY: Thank you, Bryce. Sorry for all  
7 the struggles and question.

8 So you know, there is a lot of money going into the  
9 transition for a lot of growers. Do you think that it's  
10 necessary that we really tackle the inputs, you know, for -- or  
11 the imports, excuse me, not inputs to make that successful? To  
12 me, it seems like we're missing a lot of demand. That's what  
13 you hear from a lot of people. But maybe this whole import  
14 thing really can open the door for a lot of demand. That would  
15 make that possible.

16 What do you think would make that possible for a lot  
17 of growers to come on board and to move into the organic space?

18 MR. IRLBECK: Right. Where I speak, it's just  
19 specifically on the grain space because I don't know the  
20 vegetables and the specialty products.

21 BD. MEM. PETREY: Right. No. Just asking for the  
22 grains.

23 MR. IRLBECK: Yeah. It's -- the lack of demand is  
24 not there in the grain space. I think from talking to the end  
25 users, talking to people in the grain and small grains and corn

1 and soybeans, the demand is actually growing. We are just  
2 importing faster than the demand is actually growing. And  
3 we're actually going to see a decrease of acres in the U.S. So  
4 I think we're going to see less come from the U.S. and more  
5 come from imports. And that's really going to hurt in the  
6 short -- it's going to be okay in the short-term for the  
7 industry, but the long term is what happens when the imports go  
8 away. We see \$40 soybeans. We see \$15 corn. And then we see  
9 a destruction of demand. So it's just big waves that we see  
10 happening all the time that we need to level out.

11 And I'm not saying 100 percent of everything coming  
12 across seas is fraudulent. But there's a lot of common sense  
13 we can use, and a lot of things that we can do that are simple.  
14 We're testing a very small amount of grain coming into the  
15 United States organically. I think conventional actually beats  
16 us on testing. And so -- like there's just a lot of things  
17 that it screws up demand in the short term. It really degrades  
18 the foundation of organic in the U.S.

19 BD. MEM. PETREY: Okay. So with -- you said there is  
20 an increase in demand, but there may be an increase in imports  
21 and decrease in supply -- national supply. Why is that? Is  
22 that price? Is -- you know, why would we be producing less  
23 when we have a lot of availability? Is it the price points  
24 that imports are coming in or --

25 MR. IRLBECK: So for me, it's psychological. It's a

1 little bit different of an answer. We go through a very timely  
2 process to become organic certified, which is great. I don't  
3 mind that. And we do it. We try to do as well as we can, and  
4 we get 50 questions that are different every year. So it  
5 becomes difficult and frustrating.

6 And then we see these imports come in, and we call  
7 buyers, and the buyers say, well, this is the import that's  
8 coming in this week from this country, and you know, this is  
9 the price that it's set at right now.

10 And so -- and psychologically, it is very difficult  
11 to stay in the organic space when we are getting pillaged, and  
12 these imports are coming in seemingly by the boatload. So and  
13 pricing is pricing. It is what it is. But the psychological  
14 factor of knowing that's happening feels very difficult to the  
15 long hours of organic production.

16 BD. MEM. PETREY: Yeah. Okay. Thank you.

17 CHAIR POWELL-PALM: Amy, please go ahead.

18 BD. MEM. BRUCH: Bryce, thank you for your time today  
19 and lending your voice to these issues that you guys are  
20 experiencing. Two questions real quick. You talked about the  
21 farmer point of view, and then in your comments, you mentioned  
22 the processor point of view, and you said that some processors  
23 think that -- some U.S. processors think that idling their  
24 systems this year might be more cost beneficial than trying to  
25 compete.

1           Can you expand on that just a little bit more?  
2           What's happening on a processor level?

3           MR. IRLBECK: Yes. So I won't use names, so I'll go  
4           into specific situations. We were going to sell beans, and I  
5           got into a good conversation, a very stout processor, a very  
6           reputable, long-term organic in the industry. And I don't  
7           think they import very much, if any at all. And they bought a  
8           lot from the U.S. farmer. And now that the imports are flowing  
9           in faster than you can even count, then they say, look, we  
10          might not even be able to run the plant this winter. It might  
11          be cheaper for us to just put it idle and keep the fee to keep  
12          it heated.

13          BD. MEM. BRUCH: That's concerning. Okay. Thanks  
14          for that. And I just have one quick question just diverting  
15          directions.

16          I know in the Midwest, land is expensive. Do you  
17          lease some land that you convert to organic that was  
18          conventional?

19          MR. IRLBECK: Yes. Yes. We lease quite a bit of  
20          land. And actually, that's how we've been able to grow our  
21          farm. There's a lot of landowners that wanted to go into  
22          organic. And we do it in five-year terms. So we go through  
23          the transition. We do two years of organic and then we -- most  
24          of the times, we re-lease it after that. So it is a five-year  
25          commitment, and it is a relationship with the landowners, and

1 most of them wanted organic.

2 So we are seeing a demand from the landowners, the  
3 ones that are organic and that side. So --

4 BD. MEM. BRUCH: Uh-huh. And then why did you pick  
5 five years? Again, can you mention that? Sorry.

6 MR. IRLBECK: Yes. Because we go through three years  
7 of transition. And then we want to have a guarantee to operate  
8 the land for two years with an organic crop that we put so much  
9 time and effort to get to that organic crop.

10 BD. MEM. BRUCH: Okay. Thank you, Bryce. Appreciate  
11 it.

12 CHAIR POWELL-PALM: Jerry, and then Kim, please.

13 BD. MEM. D'AMORE: Yeah. Bryce, thanks for all your  
14 work and coming to talk to us. I, for one, have zero doubt  
15 that your concerns are valid and urgent. I think it's  
16 interesting that at this point in time, you know, part of your  
17 -- or a significant part of your solution might already be in  
18 process through SOE. We'll see how that plays out. But I  
19 believe that that will give relief.

20 My one question is, and you've spent a lot of time  
21 thinking about it, and it's just one simple question. Were you  
22 in charge of inspections from overseas sources, where would you  
23 inspect?

24 MR. IRLBECK: Yes. I think the biggest thing is  
25 getting back to the origin country of where this stuff is

1 coming from, and understanding the origin of it. Which I don't  
2 know for fact, but it seems likely we don't even know the  
3 origin of most of this grain. We're shipping through countries  
4 that, you know, raise a vast majority of this grain, and  
5 shipping vast bushels through this country.

6 And so if we can get back to the origin to the farms  
7 of where it's coming from, and verify those as a U.S.-based  
8 certifier, I think that closes the loophole. I've lived in  
9 Africa. I've lived in Brazil. I farmed in both places. The  
10 people there will do fraud if it's easy. If it becomes a tad  
11 bit difficult, they'll move on to the next thing.

12 And it appears to me, again, this isn't fact. It's  
13 my opinion. It appears to me that it's so easy that they just  
14 keep doing it.

15 BD. MEM. D'AMORE: Well, between the two of us, we  
16 can talk about Ukraine and Turkey as well.

17 MR. IRLBECK: Yeah.

18 BD. MEM. D'AMORE: But I'm going to try to lead the  
19 witness on this just a little bit and tell you why I ask that.  
20 I -- the idea of -- and we've all said it. You just said it a  
21 moment ago. The idea of trying to find the people at source is  
22 very difficult. And having boots on the ground to get it done,  
23 the ability to change the flag, if you will, you know, the  
24 certificate of origin is easy.

25 What are your thoughts about all of the inspection,

1 or the majority of the inspections being done on a risk  
2 analysis and at our ports where the cost of -- first of all,  
3 the cost to get that done for the inspecting side would be  
4 less. Second of all, the penalty for a turned around product  
5 at that point would be at its maximum. Does that resonate with  
6 you at all?

7 MR. IRLBECK: Yes, it does. I think the big numbers  
8 that I think are very important is, I'll pay for it, but -- I'm  
9 paying for it anyway in the tunes of hundreds of millions to  
10 billions of dollars. The farmers are already paying for it.  
11 And so why don't we actually just pay for it to be as fully as  
12 we can. We already are paying for it by loss of revenue and  
13 profits in what we're doing, and loss of acres.

14 And so I'd look at it that way. Do it -- and then at  
15 the port of origin, I think that's a step -- or the port in the  
16 United States is a great step of upping the testing, upping the  
17 requirements of knowing where this came from. And I guess they  
18 get to switch their things and do it through a couple other  
19 countries. Why do we have to accept it then? Why can't we  
20 just accept it from the country it's supposed to come from?

21 The end user can't accept my grain if we don't know  
22 which field it comes from. I have to put it on my thing  
23 already. Why are we any different for the countries bringing  
24 it in. Why can't they go through five different people to get  
25 it here.

1           So I mean, just enforcing the same laws we already  
2 enforced would be a great step forward.

3           BD. MEM. D'AMORE: Thank you, Bryce.

4           CHAIR POWELL-PALM: Kim, please, go ahead.

5           BD. MEM. HUSEMAN: Hi, Bryce. You had mentioned kind  
6 of a whipsaw effect of pricing, where \$40 soybeans and \$15  
7 soybeans, neither one of those make sense, right, that there's  
8 got to be a market available for everyone through the food  
9 chain, we'll call it. What kind of financial risk management  
10 tools do you have available today to hedge your risk?

11           MR. IRLBECK: Yes. So there are crop insurance.  
12 It's not great. It's definitely a step behind all the  
13 conventional of the crop insurance. But the only real way is  
14 by having crop rotations and being able to have multiple crops  
15 to market that are harvested at multiple times that hedge risk  
16 between just the conventional corn and the soybeans.

17           So I think there's a biological factor, which organic  
18 was made for, and the reason why we do a lot of it.

19           The crop insurance one is -- I mean, you kind of fit  
20 into the conventional space and if you don't, it's good luck to  
21 the grower. So there isn't very much and that's why I think  
22 you see a certain set of growers that are just able to do this,  
23 and a certain set of growers that can't take that risk and do  
24 it. So --

25           BD. MEM. HUSEMAN: Do you think the market would



1 benefit from having a tool, not identical to, but maybe -- you  
2 know, we're talking parallels to conventional, let's call it,  
3 there's really not like a board of trade for the organic market  
4 that I'm aware of. But I mean, it sounds like maybe the  
5 market's lacking of financial risk management tool.

6 MR. IRLBECK: Yes, it is. You know, the Board of  
7 Trade's hard because we don't trade enough volume to make  
8 something like that work is what my understanding. You know,  
9 just taking the conventional crop insurance, and making for  
10 organic, actually, and not trying to make organic work for  
11 conventional would be a huge step.

12 BD. MEM. HUSEMAN: Thank you, Bryce.

13 MR. IRLBECK: Yeah.

14 CHAIR POWELL-PALM: Thank you, Bryce. We really  
15 appreciate you calling in today. I just have a quick question  
16 for you.

17 I think you are familiar with the GEODOC that's going  
18 to CACS about geolocating. I just wanted to see if you had an  
19 opinion on that.

20 MR. IRLBECK: Yeah. So I fully support the geo  
21 location of fields. I think here and abroad, again, a tad bit  
22 of preventive maintenance, and a lot of people that don't want  
23 to work hard and commit fraud both here and the U.S. will not  
24 do that. With just a little bit of this tracking and  
25 accountability that the whole organic standard was built on.

1 And I think georeferencing is one of those things that can be  
2 implemented without -- with very little nuisance to the grower  
3 and to the whole process and system.

4 CHAIR POWELL-PALM: I really appreciate your thoughts  
5 on that. Thank you so much for calling in today and taking the  
6 time out of your harvest. I appreciate you.

7 MR. IRLBECK: Thank you.

8 CHAIR POWELL-PALM: Next up, we have Byron Wiemer and  
9 then Bill Wolf, followed by Kylie Mausser.

10 Byron, please go ahead.

11 MR. WIEMER: yeah, welcome. I guess it's still  
12 morning. I apologize. I'm speaking from my pickup. I'm at  
13 some meetings today, but I basically sort of wanted -- was  
14 asked to sort of touch on, and you talked a little earlier, you  
15 know, the risk management side for organic, you know, and I'm  
16 just going to touch on TDLs again.

17 You know, we talked about this earlier this spring.  
18 And, you know, I'm an agent -- crop insurance agent in Utica,  
19 Nebraska. I'm in eastern Nebraska. York and Seward County  
20 would be my primary counties, but we -- you know, we write  
21 pretty much the eastern half of Nebraska.

22 But using York County as an example, you know, on  
23 irrigated corn, if you're a conventional farmer, your T yield  
24 is 223 bushels. You know, if you're going into organic  
25 transitional, that goes to 156. So you know you're 67 bushels

1 short, and you know the big hit is for that producer that's in  
2 that transitional because, you know, you start out with a 156-  
3 bushel yield, but you also use the crop insurance price, which  
4 this year was 591. So you're automatically -- right away,  
5 you're \$297 an acre less coverage than what you peers have  
6 raising regular corn.

7           And I guess the biggest problem we've seen is the  
8 last two years in my area, we've had two very severe hail  
9 storms where these producers -- this is two years -- you know,  
10 we had one last year, 2022. Again, 2023. Producers produced  
11 nothing. And so, you know, if you're that person trying to get  
12 established in organic and you're in that transitional phase,  
13 you know, that's a pretty big hit.

14           You know, last year, yes. Guys were able to --  
15 people were able to replant, and that worked. You know, this  
16 year, the storms hit later date. You know, replanting was not  
17 an option. They're going to live on their insurance money.

18           And so like I said, you know, with corn, you know,  
19 you're starting out with 67 bushels less. You know, on  
20 soybeans, you'd actually lose -- you're losing 20 bushels. You  
21 go from a 67-bushel yield for conventional beans to 47 bushels  
22 on organic. And at 13.76, which is the price this year, that's  
23 \$206.

24           So you know, when you're in that transitional phase,  
25 you know, it's a huge financial hit. Yes. Once you get the

1 organic certified, you know the yield doesn't change, but yet,  
2 your price does so. They're helping make it up a little bit,  
3 you know, in price, but you're still -- you know, you're still  
4 at a disadvantage.

5 And like I said, you know, it's really come to light  
6 for me, for the organic clients we have, you know, with the  
7 hail storms the last two years, you know, it's -- you know, you  
8 buy crop insurance as a risk management tool and it's -- we're  
9 not -- it's hard to get it covered.

10 CHAIR POWELL-PALM: Really appreciate you calling in  
11 today. This is huge. Questions from the Board? Amy, please  
12 go ahead. You're muted, Amy.

13 BD. MEM. BRUCH: Sorry about that. Sorry, Byron.  
14 Thanks for your time today. Unfortunate stories to hear, but  
15 it's real life and we've got to deal with it. I was just  
16 wondering, we have a discussion document on crop insurance this  
17 year. I appreciate your contributions, just your oral comments  
18 on this. Do you think it would be beneficial for RMA, Risk  
19 Management Agency, to consider if you did have history as a  
20 conventional farmer, consider some of that history when they're  
21 determining your T yields potentially for transition?

22 MR. WIEMER: I think it definitely would help. You  
23 know, because I mean -- if you've got conventional yield  
24 history, which most people -- well, everybody does because  
25 that's how they started, I mean, yes. You know, we know going

1 organic's different. But yes, I do believe, you know, there  
2 should be a system there where you -- you know, if you've got  
3 yield history, you should be able to use, you know, a  
4 percentage of that, or have an equation to help bump up that  
5 proven yield. Because, you know, like I said, whether you're  
6 certified or transitional, the yield's the same right now. But  
7 the really big hit for people is those three years of  
8 transitional because we're using crop insurance price versus,  
9 you know, organic does have a prior price which helps once you  
10 get certified, but you have to get there first. So --

11 BD. MEM. BRUCH: Uh-huh. Okay. Thank you, Byron.

12 CHAIR POWELL-PALM: Other questions from the Board?  
13 Kim, please, go ahead.

14 BD. MEM. HUSEMAN: Hi Byron. Can you tell me how is  
15 the crop insurance price per acre determined for organic versus  
16 -- for organic crops?

17 MR. WIEMER: Well, I mean, basically, I know, like,  
18 for conventional corn, you know, like corn -- they use December  
19 corn during the month of February. That's how that price is  
20 established. Soybeans is November beans on the Board of Trade,  
21 you know, during the month of February. Then they do that  
22 again in the fall. But as far as the organic price, I believe  
23 that is set by RMA. And I guess I don't really have the -- I  
24 don't have a good answer for you on that how they come up with  
25 that.

1           You know, this year, like I said, for organic  
2 certified, your price is \$11.10 for corn and \$28.29 for  
3 soybeans. So but I -- if you ask me how they came up with  
4 that, I honestly don't have a good answer for that.

5           BD. MEM. HUSEMAN: Thank you, Byron.

6           CHAIR POWELL-PALM: Carolyn, please go ahead.

7           BD. MEM. DIMITRI: I just -- I wanted to talk --  
8 speak to Kim's question about how the prices are determined and  
9 I -- I don't know, like looking at crop insurance, and grain,  
10 and organic, and imports, it's so very complicated. And it  
11 seems like organic grain farmers face a lot of risks that they  
12 haven't been able to diversify their way out of the way  
13 specialty crop producers do.

14           And I think maybe the fact that no one really knows  
15 how those prices are determined makes it, I think, even more  
16 problematic for grain farmers. So I guess I was just saying --  
17 kind of responding to what Kim said and what Byron said, which  
18 is no one -- there's no transparency about that particular  
19 price calculation.

20           MR. WIEMER: And, I mean, I can share -- to be real  
21 honest with you, I'm actually at a crop insurance workshop  
22 today where RMA is here. So that'll be a great question. I  
23 don't have the answer for you now, but that is a question I'm  
24 going to ask them before I leave today, you know, how that --  
25 because I do not know that right now.

1 BD. MEM. DIMITRI: Let us know what they say.

2 CHAIR POWELL-PALM: Yeah. Really appreciate you  
3 calling in, Byron, and being --

4 MR. WIEMER: Well, I appreciate being asked, so --

5 CHAIR POWELL-PALM: Please do follow up with whatever  
6 information you find. We'd love to include it in our research.  
7 Thank you again.

8 MR. WIEMER: I will be glad to do that. Thank you  
9 again for the opportunity.

10 CHAIR POWELL-PALM: And thank you for calling in from  
11 the road. I love seeing farmers in tractors, farmers in cars,  
12 taking the time and this platform allowing you to call in very  
13 easily. So thanks very much.

14 MR. WIEMER: You're very welcome. Have a good day.

15 CHAIR POWELL-PALM: You too.

16 Next up, we have Bill Wolf, followed by Kylie  
17 Mausser. And we're not seeing Zach Porter on the line. Zach,  
18 if you're there, please just let us know. Otherwise, we'll go  
19 to Frank Austin after Kylie.

20 Bill, the floor is yours.

21 MR. WOLF: Can you hear me?

22 CHAIR POWELL-PALM: We can.

23 MS. ARSENAULT: Hang on a beat, Bill. We're going to  
24 get the slides up. There we go.

25 MR. WOLF: Thank you. I'm Bill Wolf with Wolf &

1 Associates, and Second Star Farm. My comments are about  
2 increasing U.S. organic acreage with integrity.

3 First, I want to thank you NOSB members for all your  
4 work. Slide 2.

5 For 50 years, I farmed organically, launched organic  
6 businesses, served as president of OMRI and OTA, and helped  
7 hundreds of growers and handlers. There's progress, but we  
8 need even more. Please note our written comments, including  
9 that essentiality applies even when only needed by a few. Thus  
10 assuring that the national list is a robust toolbox.

11 Slide 3. Some suggestions I'd like to provide to  
12 increase U.S. organic acreage, organic pet food standards,  
13 Organics and the Farm Bill, and getting five percent of the  
14 USDA R&D money. And support -- I ask that you all support the  
15 two new organic bills before the house. An organic marketing  
16 order. An in-transition label. Those are a few ideas.

17 Slide 4. We really need to work together to  
18 communicate the value -- the true value of organic: healthy  
19 soil, healthy plants, healthy animals, people and planet.

20 Slide 5. Some new comments about residue testing.  
21 We need updated guidance to help certifiers effectively focus  
22 and coordinate testing costs and catalog the findings. About  
23 inerts. Having no inerts policy has stalled better pest  
24 control choices for growers. See our comments on how to move  
25 forward.



1           Finally, we're all working to implement SOE and stop  
2 fraud. We've put a countdown clock on our  
3 organicspecialists.com website in order to help, 151 days to  
4 mandatory compliance. We've got work to do.

5           Slide 6. I'd like to clarify our plastic -- comment.  
6 We do support re-listing it, but only for now. Eleven years  
7 ago in providence, this is kind of an anniversary moment next  
8 week, the NOSB voted to approve biodegradable mulch film, a  
9 better choice than plastic. Annotations added in violation of  
10 the now current procedures at the meeting were added and then  
11 misinterpreted. This --

12           CHAIR POWELL-PALM: Please go ahead and finish up.

13           MR. WOLF: This poisoned pill requiring a higher  
14 biobased content than the USDA biobased labeling program has  
15 been a disaster. During this decade without its use, thousands  
16 of tons of polyethylene have been used and sent to landfills.

17           Slide 7. Earthworms are a de facto mascot of organic  
18 agriculture. Let's make their jobs easier with a robust  
19 national list and more organic acreage. And I am humbled by  
20 the awesome comments from the many amazing organic farmers who  
21 spoke on Tuesday and before me today.

22           If there's any questions, I may want to go back to  
23 those previous slides. So if you can leave that up for a  
24 moment, that would be great. Thank you.

25           CHAIR POWELL-PALM: All right. Questions from the

1 Board. Sorry, I'm -- as I see this -- let's go with Logan, and  
2 then Jerry, and then Dilip.

3 BD. MEM. PETREY: Good to see you, Bill. Okay. So I  
4 actually have a question on the transition label. So part of  
5 the getting more acres to organic. I'm nervous about a  
6 transition label. Anything that -- we have already heard, you  
7 know, especially speaking from, like, a specialty crops or a  
8 vegetable producer, we've already heard the challenges with  
9 demand and the oversupply of certain commodities. Now, the  
10 transition label, again, makes me nervous at where is that  
11 demand itself going to come from if it's educated on what  
12 transition is. So if you're educating the consumer that  
13 transition is grown like organics, it's just not quite, you  
14 know, in organic soil yet, but it's going to be there soon, I  
15 feel like that's going to not pull from the conventional  
16 consumer so to speak, but it's going to pull from the organic  
17 consumer and then make demand actually less in the organic  
18 sector.

19 What do you think to that? Or are you concerned with  
20 that or do you think that's going to be a problem?

21 MR. WOLF: Logan, you're on target. That is an  
22 important issue to watch and figure out how to implement a  
23 limited use of the transition label. It's focused on U.S.  
24 acreage of crops that can go into -- go in and truly compete  
25 with what's now taking over the market, uninspected products,

1 non-GMO. And we -- there has been, before the NOP program was  
2 fully implemented, there was use of the in-transition label.  
3 And in fact, the first draft of the rule started to allow it.  
4 But you're absolutely right. We have to be careful not to  
5 simply steal away from it. But the economics of transition --  
6 first of all, the new transition funding is a great start, and  
7 it will help address that three-year cost to growers, but it  
8 doesn't solve the problem completely.

9 I've seen some companies commit to paying a premium  
10 during that three years. Over the years, that's been pretty  
11 effective, and I can think of a number of examples where that's  
12 happened. But it's not really -- it didn't cover the real  
13 farmers' cost during that period.

14 BD. MEM. PETREY: Right. And it is costly. And so I  
15 do understand that, but I -- as a girl who has transitioned  
16 land, now granted this is not -- I work for a large company,  
17 right, this is not my own finances, so -- but on the agronomy  
18 side or on the science side, the three-year transition period,  
19 what I found to be economically the best is doing covers,  
20 building that soil up, because we have very sandy soils here.  
21 We actually heard, compared from conventional, we have a lot of  
22 -- the soil has been kind of sterilized and the nematodes are  
23 just awful here. I mean a conventional grower can't grow  
24 without Telom (ph.) added. We don't use any nematicides in  
25 organic farming because our microbiology is so good, so robust,

1 but it takes time to get there. And so -- and covers seem to  
2 do that the fastest. You know, there's a lot of biomass added  
3 in, and it's lower cost. I mean, really you're paying for the  
4 seed. Now, you're paying for land rent and the loss of revenue  
5 on those acres.

6 So it is complex, but as far as, you know, getting to  
7 that success in those three years, it seems like the cover  
8 crops that -- you know, continuously cover cropping and adding  
9 what cover crops are needed, whether it's the turn of nematodes  
10 or, you know, it has biofumigant properties or weed-control  
11 properties, it seems like that is actually really helpful.

12 And so yes, the funding maybe to cover some of those  
13 expenses, which are relatively low compared to growing a crop,  
14 which requires organic inputs at a very high cost for a lower  
15 return because it takes a while to get to those yields. And so  
16 maybe that -- like you were saying, the funding might be a  
17 better long-term choice. I don't know. But I can't speak from  
18 a grower side, who's actually put their own money to do that.  
19 So I'm sure that's very burdensome. So thanks for that point.

20 MR. WOLF: And you've really spoken to the -- to why  
21 the three years. The original three years. People say, why  
22 was it? It really was to create and reestablish the biological  
23 diversity that makes the crop healthier.

24 BD. MEM. PETREY: Yeah.

25 MR. WOLF: Thank you.

1           CHAIR POWELL-PALM: We're going to jump to Jerry,  
2 then Dilip, then Nate Lewis. And I will remind everyone, we  
3 are probably going to see Bill next week, so we'll have a  
4 chance for lots of conversations. So please keep your  
5 questions focused. Go ahead.

6           BD. MEM. D'AMORE: Bill, good to see you.

7           I almost put my hand down once Logan got going, but  
8 she took a good, hard shift the agricultural side, and I'll  
9 bounce over to the go to market side, if I may, or the market  
10 pull.

11           Twice in my career, two years in the early 2000s --  
12 2002 to 2004, and then somewhat later, I literally broke my  
13 teeth on trying to make that work, to find how transition could  
14 be funded. And the only thing I can really guarantee this  
15 group by real experience is the consumer doesn't understand it  
16 well enough to pay for it. And to the question of who's going  
17 to take -- where is that -- what pile will these transitional  
18 acres be taken? My experience is from either one. It just  
19 didn't work from a go to market side. Thank you.

20           CHAIR POWELL-PALM: Thank you. All right. Dilip,  
21 did you want to -- did you have a question?

22           BD. MEM. NANDWANI: Well, he answered my question on  
23 funding, very quick, if you can clarify about this five percent  
24 funding for research and education, is it from the farm, Bill,  
25 are you suggesting, or can you clarify a little bit on that?

1 Thank you.

2 MR. WOLF: Sure. In Slide 3, what I was trying to  
3 point out was that the USDA research and education dollars are  
4 not really allocated properly. They're not directed to the  
5 part of agriculture that's really growing well. If you were  
6 just running a business and one segment of your business was  
7 growing by 10 percent every year, you'd be putting your  
8 research and education dollars there. And the USDA isn't even  
9 close to that, and we've been saying this for now 20 years, and  
10 we're still not -- but we're not saying it loud enough anymore.

11 So really, ask Secretary Vilsack to change how they  
12 allocate funds for research and education. We need the  
13 knowledge of how to manage weeds, how to really look at our  
14 pest-management techniques, how to reduce tillage in organic  
15 systems, and how to put more carbon in the soil. And carbon --  
16 this whole question of carbon sequestration, my gosh, that's  
17 the biggest answer to our climate situation is actually in our  
18 soils. And there's some good data to show organic farming  
19 practices produced more humid complexes that are more stable  
20 than any other farming method. So we need to be screaming this  
21 out, get that five percent. We're at less than one percent  
22 right now, and yet we're the market that's growing well. That  
23 was my point.

24 CHAIR POWELL-PALM: Thank you, Bill. Nate, please go  
25 ahead.

1           BD. MEM. NANDWANI: Thank you. Thank you for your  
2 comments.

3           BD. MEM. LEWIS: Thanks, Bill.

4           We heard a few commenters yesterday share their  
5 opinion that OPA and the National List criteria requires inerts  
6 to be listed individually. And I'll note your comments were in  
7 support of an option for inerts that was a broad list with some  
8 exceptions when those fail the National List criteria. So I'm  
9 curious if you can elaborate on your opinion about how that  
10 approach would also meet OPA and the National List criteria.

11           MR. WOLF: Sure. Well, first the road block has been  
12 devastating. I've worked with companies who have withdrawn  
13 from researching for organic, and then taken their pest control  
14 products into the conventional market or even shut down and  
15 gone out of business because they couldn't know what the future  
16 looked like, so they couldn't rely on List for -- EPA List for  
17 inerts.

18           So and I've been watching that happen for over ten  
19 years, and we've lost -- we just lost a huge amount of ground  
20 there. Basically, I mean, it really is a mess and I understand  
21 it's not an easy solution. But the bottom line, when I'm  
22 saying rather than single products, start by allowing specific  
23 groups, in our case -- our comments that allow -- and the two  
24 options in the June '23 memo to the NOSB, we think getting  
25 started by allowing the inerts, that the EPA allows the

1 minimalist pesticide products and allowing inert ingredients  
2 that EPA allows in passive pheromone dispensers is a good  
3 start.

4           It's also possible that there are categories. I  
5 mean, we have substances on the National Lists that are listed  
6 as groups and there are -- it's possible that once you get down  
7 into the reviewing process, there are groups that we can  
8 document as complying with the criteria rather than listing  
9 every individual in that group. And that was where we started  
10 to go with the smarter -- you know, the safer list, the EPA  
11 safe compounds. But they don't use the same criteria, so I  
12 understand you're -- that didn't flow.

13           But moving forward on this as quickly as possible,  
14 even in chunks would be a good start. Does that help answer  
15 your question? Thanks.

16           CHAIR POWELL-PALM: All right. We really thank you  
17 for your time and input, Bill.

18           MR. WOLF: I've got to apologize for one thing. We  
19 have three associates who are going to be at the meeting next  
20 week, but I am unable to attend. I'm really sorry. If there's  
21 any chance I can just suddenly hop on a plane, I will, but I am  
22 going to miss being there in person, but I'll be watching the  
23 proceeds, and thank you all for your good work.

24           CHAIR POWELL-PALM: Thank you.

25           All right. Next, we have Kylie Mausser, followed by



1 Frank Austin -- and then, Michelle, we don't have Justin Raikes  
2 on the line, correct?

3 MS. ARSENAULT: He's not at the moment, but we'll  
4 keep checking for him closer to his time.

5 CHAIR POWELL-PALM: Justin, if you're there, please  
6 make yourself known, but Kylie, please go ahead.

7 MS. MAUSSER: Hi. Can you guys hear me?

8 CHAIR POWELL-PALM: We can.

9 MS. MAUSSER: Okay. Hi. I'm Kylie Mausser, and I am  
10 just calling in as a measly consumer, after hearing all of  
11 these farmers talk, it's awesome to hear all the things you  
12 guys are doing, and I know the Board does so much. So thank  
13 you. I'm really grateful for that.

14 So I am from Iowa, and I'm also just calling to ask  
15 you guys to look at the next generation for what's going on  
16 with organics. So I homeschool my four kids, and I started  
17 becoming interested in organics when I was a senior in high  
18 school when my mom got very sick. She was like most Americans,  
19 eating the standard American diet. And then with the help of  
20 some holistic people in her life, she started changing her ways  
21 and started caring about the food she was ingesting. And  
22 through that, the food healed her.

23 Since then, I've been educating myself on things that  
24 make our bodies heal, including organics, herbs, and natural  
25 healing remedies. Organics is honestly the area that I still

1 continue to need the most education on because I find that it's  
2 really difficult to find accurate factual information. I have  
3 to hunt for legitimate facts, and what I do find is  
4 unbelievable.

5           The most outrageous fact that I find, though, is the  
6 fact that it's so difficult to find information at all, and  
7 it's also surprising that most of the population doesn't know  
8 anything about it.

9           We're missing the opportunity to give every American  
10 consumer what they deserve: the right to learn what organics  
11 means. The USDA organic food label is literally the only food  
12 label that guarantees a refuge from toxic pesticides and  
13 herbicides. It's the only food label that guarantees  
14 traceability and transparency. I still actually have friends  
15 who think that non-GMO is better than organic, or at least  
16 compatible.

17           Unfortunately, people believe what they hear on TV,  
18 and what they hear on TV is largely funded by companies that  
19 profit from unhealthy consumers, like big pharma. The money  
20 isn't in organics and I know that. We don't hear the truth as  
21 consumers. Education would help the consumer, whether it's a  
22 curriculum, like I could teach my kids, which I try to do that  
23 on a daily basis in our home, or the labels at the grocery  
24 store that everyone can read and see the difference between the  
25 foods and the fake food that they are actually eating most of

1 the time.

2 Can we go as far as offering commercials at the Super  
3 Bowl to display the truth, or is that too controversial? I'm  
4 really grateful that through my life, I've been aware of the  
5 benefits of organics and have been able to see through the  
6 propaganda and the green washing. I would love to see  
7 organizations and people become more educated and aware of what  
8 is truly going on in regards to food in our country.

9 And that's all I have.

10 CHAIR POWELL-PALM: We so appreciate you calling in.  
11 Thank you.

12 MS. MAUSSER: We don't get to hear from consumers  
13 enough. And we've got a question for you from Mindee. So stay  
14 on the line one second. Mindee, go ahead.

15 VICE CHAIR JEFFERY: Yeah. I just wanted to say  
16 thank you so much for showing up in democracy, and telling us  
17 who you are and what you're struggling with as a consumer.

18 I just want to let you know that if people like you  
19 hadn't showed up in the grocery store and asked me hard  
20 questions, I wouldn't know as much as I know about what's going  
21 on in the food system. So I just want to express my  
22 appreciation to you.

23 MS. MAUSSER: Thank you.

24 CHAIR POWELL-PALM: Logan, please go ahead.

25 BD. MEM. PETREY: Man, I am so glad you came on.

1 That was exciting. And I really think it does show that we are  
2 not marketing very well, and this is probably a huge  
3 opportunity to get to people. What do you -- as a consumer, as  
4 a mom, as somebody who cares, you have friends, how do we do  
5 that? What would -- do you think -- I know you mentioned the  
6 Super Bowl. That's very expensive. But what are some other  
7 things you thought would be good because, you know, I mean, I  
8 think that there are opportunities and they may be smaller. Is  
9 it podcasts? Like, would somebody listen to a podcase?  
10 Because a lot of health things that I've listened to are from  
11 people on YouTube, you know, that have -- that are influencers,  
12 things like that. What would you -- help you?

13 MS. MAUSSER: I think that definitely helps. I mean,  
14 I think that -- I don't know. I feel like in the homeschool  
15 community, it's really small and big at the same time. Like a  
16 lot of us think the same, so we all talk about it. But I have  
17 a lot of friends in other areas as well, and you know, I talk  
18 to them about it. But so even public education would be huge.  
19 But I feel like there -- I just can't believe the amount of  
20 people -- my parents also have a feed and grain business and we  
21 sell regular chicken feed and non-GMO feed. And again, I know  
22 non-GMO is not the same as organics at all, but people don't  
23 even know what non-GMO sometimes. And like, I just can't  
24 believe that they don't even -- and I -- I don't know, I feel  
25 like most people are getting information from TV, which

1 obviously the Super Bowl is go big or go home, but --

2 BD. MEM. PETREY: Sure. But do you think if we had  
3 like a quick website that said this is what organic is, you  
4 could share that, or maybe that's a QR code that somebody could  
5 go to and it's just like a fun information page that does that.  
6 Would that -- that may help --

7 MS. MAUSSER: Yeah.

8 BD. MEM. PETREY: That may help me hearing something  
9 else.

10 MS. MAUSSER: Not to mention if people could post  
11 that on social media, and share it, or even --

12 BD. MEM. PETREY: Okay.

13 MS. MAUSSER: That would be great. That would be  
14 awesome.

15 BD. MEM. PETREY: Okay. Great. Thank you so much.  
16 Appreciate it. Liked hearing from you.

17 CHAIR POWELL-PALM: We've got a question for you from  
18 Amy. Amy, please go ahead.

19 BD. MEM. BRUCH: Thanks, Nate. Thanks, Kylie, for  
20 lending your voice to our process today. I think there might  
21 be one small correction. I thought you introduced yourself as  
22 a measly consumer, and I'm sorry, you're very powerful. We  
23 need you guys -- farmers need you guys and I love it because we  
24 learned on Tuesday, farmers want more markets. And it's cool  
25 to learn that consumers want our products. We just need to

1 educate a little bit more. So thank you for sharing that.  
2 That's really inspiring.

3 MS. MAUSSER: Yes. And I do feel like people don't  
4 -- some people don't know that they need the products, but I  
5 feel like so many people are sick and they don't know why  
6 they're sick. And I think that it's kind of the root of the  
7 problem. You know, so it's like they don't know what they're  
8 missing.

9 CHAIR POWELL-PALM: Well, thank you for joining us.  
10 Thank you for bringing your voice. And I just reiterate what  
11 Amy said, we're only here because of you. I mean, this  
12 industry only exists because of consumers and demanding that --  
13 and paying for the premium for organics. So thank you so much  
14 for, you know, joining us and making your voice heard. I  
15 really appreciate. I look forward to that homeschool  
16 curriculum for the day when I have kids, and we have a whole  
17 class on what is organic for K through 12. I really like that  
18 idea. So thank you.

19 MS. MAUSSER: Thank you for all that you guys do.

20 CHAIR POWELL-PALM: Take care.

21 Next up we have -- thank you. Next up we have Zach  
22 Porter, followed by Frank Austin, and then Justin Raikes if  
23 he's on the line.

24 So Zach, please go ahead.

25 MS. ARSENAULT: Zach if you are on the -- there we

1 go. He got unmuted.

2 MR. PORTER: Can you hear me?

3 CHAIR POWELL-PALM: We can. Loud and clear.

4 MR. PORTER: All right. How are y'all doing today?

5 CHAIR POWELL-PALM: Doing well, thank you.

6 MR. PORTER: First off, appreciate everything that  
7 you guys are doing here to help, you know, move the industry  
8 forward. I farm out in western Nebraska. I'm in the process  
9 of converting about 5,000 acres to organic at the moment out  
10 that way. And as a relatively new entrant from a production  
11 standpoint into the organic marketplace, and after having  
12 traveled the world, helping investment fund about a decade ago,  
13 looking at food and ag opportunities, there are two things that  
14 have really kind of struck me as particularly interesting.

15 The first is that from a paperwork management  
16 standpoint, particularly as it relates to getting and  
17 maintaining organic certifications, I've been pretty surprised  
18 by the lack of digitization and geotagging of fields, to  
19 actually say yes, you know, this is where this field is. It  
20 goes with this paperwork. Especially as we're looking at  
21 growing and potentially taking on additional acres that have  
22 already been converted, the lack of access to something digital  
23 and potentially geotagged seems like just a massive area of  
24 inefficiency in the process.

25 And I'm not sure what could be done or is going on

1 yet on that front, but I do want to raise this as an issue for  
2 discussion.

3           And then secondly, kind of as an extension of that  
4 digitization here, one of the things that I found after frankly  
5 investing in Central and South America, Southeast Asia, West  
6 Africa, Eastern Europe, across the agricultural value chain is  
7 that it astounded me to learn how much product is fraudulently  
8 being labeled as organic and shipped into the country. Whether  
9 it was corn that was cracked and therefore was evading a lot of  
10 oversight and checking at the ports because it was labeled as  
11 feed rather than something for human consumption, or I'd be  
12 happy to dive into more specifics around that, it strikes me  
13 that this is something that may also benefit from either a  
14 geotagging or digital track and trace type of innovation, which  
15 I've seen in other sectors and would love to support however  
16 possible rolling those things out here.

17           So appreciate the time.

18           CHAIR POWELL-PALM: We really appreciate your  
19 comment. Thank you for making the time to call in today.

20           Questions from the Board? I just have a quick  
21 question for you, Zach. We have this document Georeferencing.  
22 It's basically a guidance, saying that for best practice,  
23 certifiers would collect the legal coordinates or geocoordinate  
24 for each field. Do you feel like that's a small step in the  
25 direction you're envisioning for the industry?



1 MR. PORTER: Massively so.

2 CHAIR POWELL-PALM: We really appreciate that.

3 MR. PORTER: The amount of paper headache that exists  
4 from something like that not happening is asinine.

5 CHAIR POWELL-PALM: Thank you. We do appreciate  
6 that. All right. Take care. Thank you.

7 MR. PORTER: Thank you.

8 CHAIR POWELL-PALM: Next up, we have Frank Austin,  
9 followed by Justin Raikes, and then Ginny Olson.

10 And I will remind folks, if you could when you start  
11 your comments, please just state your name and affiliation. Go  
12 ahead, Frank. The floor is yours.

13 MR. AUSTIN: Sure. All right. Well, good afternoon,  
14 NOSB. My name is Frank Austin and I'm from Clear Fronteer Ag  
15 Management. We are an organic and sustainable farmland fund.  
16 And then here today to speak about the critical need for  
17 stronger measures to prevent fraud in the organic supply chain.

18 So in the last 12 months, we've imported 170,000 tons  
19 of cracked corn, all from Turkey; 57,000 tons of whole corn;  
20 338,000 tons of soybeans; and 293,000 tons of soybean meal.

21 If we look a little bit more closely at an example,  
22 specifically let's take Ghana, for instance, in the last 12  
23 months, they've represented 16 percent of organic soybean, you  
24 know, imports that we've received to U.S. ports. But if we  
25 step back, and we look at likely certified organic acres in

1 Ghana for 2022, or 2021, we would need roughly 65 percent of  
2 the certified organic acres in Ghana to be planted to soybeans  
3 to hit the actual quantities that we're receiving in our ports.

4 So you don't necessarily have to pick apart the  
5 organic standard, but just do some basic fact-checking on the  
6 available data, and you'd see that it's very unlikely that all  
7 of those soybeans are actually coming from Ghana, right?

8 So American farmers work very hard to uphold the  
9 integrity of the organic label, but their livelihoods are being  
10 threatened when bad actors cut corners and fraudulently label  
11 products as organic. This unfair competition drives down  
12 prices and misleads consumers. The NOP must take steps to  
13 close loopholes that allow organic fraud to persist. A key  
14 priority should be requiring certifiers to collect GPS  
15 locations. As we know from the example I just walked us  
16 through, you know, GPS locations would be very, very helpful  
17 for us to actually calculate accurate numbers here.

18 So again, this would be GPS locations across the  
19 entire organic supply chain for brokers, handlers, and farmers.  
20 Another critical step that you have to consider is stricter HS  
21 codes. So all of the import codes that we actually have, and  
22 the way these import codes are labeled, and the cross-labeling.  
23 This is how the bills of lading are ultimately doctored or  
24 altered. And it's also oftentimes how a lot of fraud gets  
25 under the radar. So we do need more detailed HS codes, and

1 that's going to obviously help us actually track real volume.  
2 As I've been listening to people speak today, I've heard a lot  
3 of different growers, you know, talk about how they don't  
4 really know what's going on in the market. Well, of course  
5 not. Because we don't have HS codes that are allowing us to  
6 track the actual volumes that are coming in.

7           You know, we shouldn't sit around and debate about  
8 funding a flood department when the house is on fire. This is  
9 of the utmost importance of us and -- you didn't cut me off.  
10 Thank you.

11           CHAIR POWELL-PALM: No, no. Go ahead.

12           MR. AUSTIN: The utmost importance for us that we,  
13 you know, follow through on this, because this is fraud that is  
14 happening today. This is not, you know, it might, or we don't  
15 have any evidence. If I'm pulling data, all of these bills of  
16 lading, right, from every U.S. port, and I'm getting to a rough  
17 estimate of 65 percent of the acres in Ghana have to be planted  
18 to soybeans. An incredibly difficult crop to grow, right, you  
19 know, organically. Think about this. This is right in front  
20 of us. This is looking us right in the eyes. And I'll be  
21 honest with you. That is -- the example I walked you through,  
22 I don't have rock solid data to say that that's 100 percent  
23 correct. It's a best estimate. But that estimate alone should  
24 scare us, and it should be a call to action.

25           We have a question for you from Kyla. Kyla, please

1 go ahead.

2 BD. MEM. SMITH: Hi, there. So call to action sort  
3 of taken here, one of the provisions in the strengthening  
4 organic enforcement final rule is the requirement that  
5 certifiers perform supply chain traceability audits. And that  
6 can -- those audits can have different objectives. But what  
7 the requirements indicate are that certifiers are going to need  
8 to work with each other, you know, across the supply chain  
9 because a certifier may only certify a portion of the supply  
10 chain.

11 And so do you -- with the data that you presented and  
12 the problem, do you think that that will help, at least, to try  
13 to, like, uncover where the potential fraud might be in that  
14 supply chain to be able to have certifiers work together to  
15 perform that supply chain traceability audit from the importer  
16 or the end -- wherever the grain ends up in the U.S., all the  
17 way back to the country of origin, which right now is not  
18 widely happening but will be required.

19 MR. AUSTIN: No, it's a good question. And if you  
20 had asked me this question at the beginning of the year, I  
21 probably would have said, yes, I think this sounds very  
22 effective. But given where grain prices are today, I want to  
23 step back and I want to just kind of think about what do we do  
24 -- like when we think about NOSB, what is NOSB here for? It is  
25 here, it functions to protect the integrity of the American

1 organic supply chain. And from what I can tell, the red tape  
2 that we get with regulation, it just isn't working. It's not  
3 cutting it. And so what I would say is it would be wise for  
4 NOSB to consider cutting the head off the snake.

5           We don't have time, because margins are getting  
6 thinner and thinner, and as they increasingly get thing; and we  
7 all know inflation is not slowing down, right? Ask any grower  
8 on the phone today. They'll tell you, it's awful. You know,  
9 so how many people can we really expect to still be organic and  
10 it's a wonderful plan. I think supply chain audits, I move  
11 forward with them. I'm very supportive of it. But I don't  
12 think you have the time for an audit. I think you have -- you  
13 do have bills of lading that come in. You do have data from,  
14 you know, the trade commission. There needs to be, like, an  
15 emergency call to action. You need to pull together a task  
16 force. You need to do -- you know, go agency to agency,  
17 collect all the data you possibly can that might shed some  
18 light on this.

19           You have to go after the buyers. Buyers today, and  
20 I'll just be honest with you. You know, I buy farmland for my  
21 investors and I work with farmers. I love grain buyers. But  
22 I'll tell you, the system is set up for buyers to basically be  
23 a black box if they want to be. And I know most don't. But  
24 the issue is that they can be.

25           And when you have that volume of cracked corn coming

1 out of Turkey, all of it out of Turkey, all of it, and then you  
2 see what's going on in our grain prices. And then you know  
3 earlier someone was talking about soybean prices and, you know,  
4 should they be \$20 or \$40, you know, who knows because you're  
5 not dealing with a real market with 20, 30, 40, 50, 60 percent  
6 of what your supply is is potentially contaminated. And people  
7 are talking about moving to options. No financial institution  
8 will want to touch that.

9           If you don't have stricter regulations in place, if  
10 you're not actually enforcing the law, and keep in mind, these  
11 countries, they don't have criminal penalties for passing  
12 something off as organic when it's not. They don't go to jail.  
13 You don't even get a ticket. It's just like putting a sticker  
14 on a box and shipping it over to the Americans, who don't  
15 check. And they're making a fortune, and our growers are  
16 losing money. So there's no time.

17           I mean, I think you have to move forward with the  
18 supply chain audits, but I'm actually saying there needs to be  
19 additional action because it's not about -- you can't fund the  
20 fire department when the house is burning down. That sort of  
21 thing. But a great question. Thank you so much for asking me  
22 that. I appreciate it.

23           CHAIR POWELL-PALM: Amy's got a question for you.

24           BD. MEM. BRUCH: Frank, thanks for lending your voice  
25 to the process today. I really appreciate it.

1           I had a question. Can you talk about the challenges  
2 that foreign trans shipments provide to tracking and  
3 understanding imports? Because right now, the SOE is requiring  
4 point of department import certificates. So can you talk about  
5 -- you kind of talked about the black box, or you eluded to it,  
6 can you talk and open that up just a little bit?

7           MR. AUSTIN: Yeah. Before regulations are written,  
8 you need to think about the financial instruments that are  
9 going to be used in these transactions. So if you think about  
10 commodity trade finance, and the way these notes are  
11 structured, you can put the institution that is, you know,  
12 underwriting this as sort of a receipt address. So there's a  
13 way -- there are work arounds here that you have to be very,  
14 very cognizant of.

15           The other thing, too, is you know, where did those  
16 soybeans come from? They didn't come from Ghana, you know, in  
17 this example, suppose the acres are correct on it. We know  
18 that a very large percentage of organic acres in Ghana must  
19 have been planted to soybeans, if in fact those are organic  
20 soybeans. But back to the point, so stepping back and thinking  
21 about this, you know, it's obvious that -- to me, at least,  
22 that there must have been soybeans coming from elsewhere and  
23 being shipped out of Ghana.

24           So they go to Ghana. They're relabeled. And then  
25 they're shipped. And that's a very, very difficult thing to

1 track. I've only ever been able to kind of get real data on  
2 that with respect to the cracked corn coming in to Turkey from  
3 -- you know, like Tajikistan, etcetera, Central Asian, you  
4 know, the flow of conventional cracked corn. And it flows out  
5 of Central Asia, and into Turkey, and suddenly it's organic,  
6 right? And then into the U.S., right to the U.S., destroying  
7 organic corn prices.

8           You know, look at the spread between conventional and  
9 organic corn in the last five years. It's terrible. It's  
10 terrible. And you have all of these families that have  
11 invested their life savings, their future, everything into this  
12 label that the USDA has said, look, this is our seal of  
13 approval, right, on your operation. But then, you know,  
14 there's nothing but five million different administrative  
15 processes, and sit around and wait, when we've identified fraud  
16 in the market. It's very disappointing. It's very, very  
17 disappointing, because at the end of the day, if the job of  
18 NOSB, or NOP, or whomever, I don't know, is to protect the  
19 integrity of the supply chain, it's just not happening. And  
20 it's just not happening.

21           CHAIR POWELL-PALM: I mean, it's -- I'm going to kick  
22 it over to Franklin real quick for another question.

23           MR. AUSTIN: Sure.

24           BD. MEM. QUARCOO: Two quick questions for you. One  
25 of them is what kind of yield per acres estimates did you use



1 for the estimates for the acreage that is needed? Did you use  
2 yield pay estimates from here in the United States or from the  
3 location you were referencing? I'm also particularly  
4 interested in your import data that is cited. And finally,  
5 what is the main loophole that accounts for basing coming in  
6 when they may not be what they say they are? What is the main  
7 loophole that needs to be closed?

8 CHAIR POWELL-PALM: And I know there's going to be  
9 follow-up here, Frank, so if you can keep your answer kind of  
10 short, and make sure to send your info to everyone to follow up  
11 with you.

12 MR. AUSTIN: Yeah. Guys, so for anyone who wants --  
13 I'm happy to go through all of the specifics of the data here  
14 in this example, and I could run a bajillion examples for you  
15 if you want. So just give me a call, shoot me a text or an  
16 email. That's totally fine. Happy to get on a call with you  
17 there.

18 I don't really know what the main loophole is. If I  
19 knew, I would have made a whole pitch book and emailed it to  
20 you two weeks ago when I should have, and I would've had slides  
21 and all of that. I really don't know -- it seems to be -- we  
22 need to figure out a way to make them less agile. You know  
23 what I mean? So if you can restrict the agility of these  
24 people who are committing fraud, then they're not necessarily  
25 going to be able to bounce from one thing to another. Because

1 in India, Post the anti-soybean dumping investigation is an  
2 excellent case study of that. Right? Because what we saw was  
3 this gap in the market where, like, suddenly all of these, you  
4 know, certified organic soybeans that were coming in  
5 consistently at a great price for everyone, they just  
6 disappeared when India went offline. But then a few months  
7 later, they reemerged. Suddenly, Canada's got it. And then  
8 just on that, I always used the same -- to keep it a one to  
9 one, I use 60 bushels an acre. That's a Midwest. You know,  
10 and that might be too gracious. It might be too light. But  
11 what it does do is it allows me to say how -- what is the  
12 percentage of U.S. acres planted to soybeans and what is the --  
13 you know, in organic, and then what is the percentage of, you  
14 know, acres in Ghana planted to organic based on the data I  
15 have, right?

16 And so in estimating those certified organic acres is  
17 incredibly difficult, but you know, what is NOSB's preferred  
18 margin of error. You know, would you prefer 10 percent of the  
19 soybeans to be fraudulent, 65 percent, 20 percent, zero? You  
20 know, I mean, that's a decision that USDA has to make. Does it  
21 really matter if it's 65 percent, or 10 percent, or 1 percent?  
22 It should be zero always. Because fraud just destroys a  
23 market. You can't have a real market when any percentage of  
24 the market is fraudulent.

25 CHAIR POWELL-PALM: We really appreciate this. We

1 would love as much of this data as you can share with us. So  
2 we're going to pass around your info to the rest of the Board  
3 and we'll be in touch. Thank you, Frank. We appreciate it.

4 MR. AUSTIN: Thank you so much. All right, guys.  
5 Have a great day.

6 CHAIR POWELL-PALM: Michelle, is Justin Raikes on?

7 MS. ARSENAULT: Justin is with us.

8 CHAIR POWELL-PALM: All right. Justin, perfect.

9 MR. RAIKES: Hello. Can you hear me?

10 CHAIR POWELL-PALM: Yes, we can. Please go ahead.

11 MR. RAIKES: All right. Thanks to the Board.

12 Appreciate everything you guys do. My name is Justin Raikes.  
13 We're in eastern Nebraska. I'm a fifth-generation family  
14 farmer. We have been certified organic for I believe six year  
15 -- or five years now.

16 Our operation employs about 20 people, a bunch more  
17 all in -- excuse me, a bunch more part-timers included. I just  
18 want to speak to the fraud issues fully. Fully appreciate  
19 support what Frank is saying and we agree. Just in the case of  
20 the 2022 crop year alone, you know, our price moved from 36 to  
21 21 in organic beans. To us -- cost us at least \$225,000 in  
22 losses. I mean, it's -- it's a big number. The fraud is a big  
23 problem.

24 We work very, very hard. Our whole team works very,  
25 very hard to follow the rules, not just the letter of the law,

1 but the spirit of the law, work with our certifiers, and try to  
2 do everything we possibly can to protect the integrity of what  
3 we're doing, and of the program, and of the label.

4           The other thing I would say is that we have a  
5 relationship -- we also sale retail beef. It's not organic,  
6 but we have a retail beef business and got some wholesale as  
7 well. And I would say through our retail relationships there,  
8 as well as some other ones that I'm privy to of large, well-  
9 known, national retailers, I can tell you that retailers are  
10 not -- are also not interested in carrying fraudulent products.  
11 They're very concerned with, you know, this issue. They're  
12 looking for guidance from NOSB, and from USDA, and so I know  
13 there have been a number of good ideas discussed at this point  
14 in time, including geotagging. But there's been a bunch of  
15 good ideas. I support all of them. I would encourage the  
16 Board to do everything it can to move forward to clamp down on  
17 the integrity of the program.

18           And I'm happy to give the rest of my time to Frank or  
19 anybody else that's got something good to say. Thank you.

20           CHAIR POWELL-PALM: All right. We really appreciate  
21 you calling in today. This is the theme. We are hearing it  
22 loud and clear, and we were are here for that action right now  
23 as necessary. So we're putting our heads together on that.

24           Any questions for Justin from the Board? All right,  
25 Justin, we really appreciate your time. Thank you for calling

1 in during harvest, and thanks for all of your good work out  
2 there.

3 Next up, we've got Ginny Olson, followed by Aaron  
4 Hobbs, and then Emily Musgrave.

5 MS. OLSON: Hi. My name is Ginny Olson and I'm a  
6 crop insurance agent. I primarily work with organic growers.  
7 One of the most challenging questions I receive every year is  
8 what's considered a good farming practice. So, for example,  
9 can I plant my soybeans into rye, and then roller -- crimp it  
10 at end pieces?

11 And so this question came to me probably about six  
12 years ago. And so the first year I asked my insurance company  
13 and it was given written approval that yeah, that's a good  
14 farming practice. Fast forward to the next year, I reached out  
15 to three different insurance companies, asked them the same  
16 question, including the insurance company that approved it the  
17 year before, all three of them said no, that's not considered a  
18 good farming practice.

19 I took my letters that I received from experts and I  
20 emailed it directly to RMA and RMA came back and said, yeah,  
21 that's a good farming practice. You do not have to do a  
22 written agreement.

23 So I sent my response from RMA to the three insurance  
24 companies and then they all said yes, we'll approve it.

25 Here's my concern. If there's agents that are not

1 getting pre-approval, there's farmers that are not being paid  
2 claims. And I know this for a fact because every year, I get  
3 calls from different farmers that I don't even insure that say,  
4 hey, should this be paid. They're being told during claim time  
5 that they're out of luck. They're not going to be paid a  
6 claim.

7           So two years ago, I had five different farmers call  
8 me. All of them had different farming practices that played  
9 different scenarios. Fortunately, I was able to help three of  
10 those farmers. I didn't insure them, but I was able to help  
11 them by providing them the documentation I had on good farming  
12 practices for each different scenario.

13           So three out of the five did get their claims paid,  
14 but the other two did not. And so my concern is the lack of  
15 consistency or no consistency at all. You know, farmers are  
16 doing what they think they should be doing. They're following  
17 what the expert advice is, but then coming -- at claim time,  
18 they're probably not getting paid a claim.

19           I have reached out to many different experts, so  
20 extension offices, professors, you name it. And sometimes it's  
21 crickets on my end. I'll call them. I'll email them. And I  
22 won't get a response. One extension office told me directly,  
23 hey, we can see that this is a benefit, and we do agree with  
24 this good farming practice, but I can't put it in writing  
25 because we don't have enough data to support it.

1           So even if your extension office does agree with you  
2 doesn't mean you're going to get a letter. Thank you.

3           CHAIR POWELL-PALM: Thank you so much for your  
4 comments. Wood as a question for you.

5           BD. MEM. TURNER: Thanks, Ginny. I'm really  
6 struggling to understand this issue, and I really appreciate  
7 all the comments we've heard about it. But I'm wondering --  
8 are you saying that we're dealing with human error, human  
9 subjectivity, bias against organic. Tell me what you're saying  
10 because I'm -- really, I'm struggling with this.

11           MS. OLSON: I think it's lack of education possibly.  
12 So for example, I have really good adjusters that want to do  
13 right, but when they're calling back in and saying, hey, you  
14 know, is this approved? The insurance company will shut them  
15 down faster. So I'm not sure that it's a thing against  
16 organics. I think it's just lack of understanding that hey,  
17 you can do different farming practices that may not be the norm  
18 -- that are not the norm for conventional.

19           Because, you know, right, wrong, or indifferent. I  
20 could get in trouble for this, but I will -- I will talk to the  
21 insurance companies quite extensively and say, hey, could you  
22 provide the said adjuster training? Could you let them know  
23 that this is a common practice? Now, whether or not they do  
24 that instruction, I don't know.

25           BD. MEM. TURNER: Thanks, Ginny. I appreciate the

1 candor. I really do.

2 CHAIR POWELL-PALM: Thank you so much, Ginny. This  
3 is very useful information, and we're going to keep working on  
4 it.

5 MS. OLSON: Thank you, guys.

6 CHAIR POWELL-PALM: Thank you.

7 Next up we have Aaron Hobbs, followed by Emily  
8 Musgrave, and then Harriet Behar.

9 Aaron, the floor is yours.

10 MR. HOBBS: Thank you. Good afternoon.

11 My name is Aaron Hobbs. I have the pleasure of being  
12 the executive director for the North American Coalition for  
13 Insect Agriculture, and it's a pleasure to be with all of you  
14 this morning. I'll admit, this is my first time to be with all  
15 of you, and I have certainly learned a lot. I'm excited to be  
16 here and excited to be a part of this conversation going  
17 forward.

18 I come to you with really -- you could call it two,  
19 maybe three goals. Goal number one is to introduce our  
20 industry to all of you that are here, and at least an initial  
21 introduction about who we are, and then what it is that we're  
22 doing, and the work that we look to do with NOSB, as well as  
23 with the organic sector overall.

24 So we are a traditional trade association  
25 representing folks that are growing insects. Primarily, three



1 insects here in North America: crickets, mealworms, and the  
2 larva black soldier fly. And then providing those insects as  
3 ingredients into food and feed.

4 And our membership is growing. Our industry is  
5 growing. We have an exciting role as part of circular  
6 agriculture. It's a really fun and interesting business that  
7 we're in. And our two areas of focus, at least initially, as  
8 we start to work with all of you, and as we start to understand  
9 this process, is number one, around our frass. Our byproduct  
10 from the rearing of our insects is frass, and we are looking to  
11 create a more consistent and hopefully more efficient process  
12 to have our frass certified as organic.

13 Today, the way that frass is referred to, is only  
14 referred to in the negative in NOSB -- in documentation of the  
15 USDA, and it's created a lot of confusion around how we  
16 register our frass, and it's made that process very time  
17 consuming and very difficult.

18 And so we're looking, number one, is to create a more  
19 consistent and efficient process for that. And number two,  
20 again, this is a very short-term goal as we look at the future  
21 of our industry. And that is getting our products able to be  
22 used up to that five percent inclusion rate for processed  
23 foods.

24 So we -- for example, we sell our meal and oil into  
25 petfood, and to be able to include our products in an organic

1 petfood, as one example, is something that we are looking to do  
2 here in the short term.

3           Again, as we look at everyone that's on this call,  
4 the organic sector as a whole, this is a long-term investment  
5 and partnership that we are looking to start. But again, these  
6 are our first two priorities.

7           So again, Aaron Hobbs. And we're excited to be here.  
8 We'll look to meet many of you hopefully in person in Rhode  
9 Island next week. And with that, I'd be happy to see what  
10 questions you all have.

11           CHAIR POWELL-PALM: Thank you, Aaron. We appreciate  
12 your comments. Questions for Aaron.

13           All right. We really appreciate you. See you next  
14 week.

15           MR. HOBBS: The first guy with no questions. Tough.

16           CHAIR POWELL-PALM: Nate Lewis has got you. Nate, go  
17 ahead.

18           MR. HOBBS: Man, I really appreciate it. You saved  
19 me.

20           BD. MEM. LEWIS: I had a question about the frass  
21 products. Are you looking to get those registered and approved  
22 for -- like as a crop input or --

23           MR. HOBBS: Yes.

24           BD. MEM. LEWIS: Yeah, okay. And then in that vein,  
25 livestock manure, there's a couple of different ways to reduce

1 pathogens so you can compost it or you can process it. What's  
2 the typical process in the insect frass industry for reducing  
3 pathogenicity on those inputs?

4 MR. HOBBS: Great question. So -- and for clarity,  
5 we do have some of our members today that already have an OMRI  
6 certification, for example. That process is just not one that  
7 is repeatable for many of our members, due to the feed stock  
8 that they're providing to their insects. Right? And because  
9 of the ability for insects to process so many things, and have  
10 a safe and healthy product at the other end, it's just the  
11 process that currently exists is just not -- it's not going to  
12 work, or it would certainly limit our ability to participate in  
13 regenerative or circular agriculture. It would limit our feed  
14 stocks, etcetera.

15 And so the -- as far as what are the processes? We  
16 have a variety of processes for how the frass is handled. The  
17 three insects, their frass is slightly different. And so the  
18 processes are slightly different as well. But we have some  
19 products that don't require any additional processing. They're  
20 below the toxicity levels, or below the detectable levels, and  
21 so there's no additional processing necessary. Others, it's  
22 heat. There's a variety of ways to do it.

23 BD. MEM. LEWIS: I look forward to talking frass next  
24 week with you.

25 MR. HOBBS: All right. Great. I'll be there.

1 CHAIR POWELL-PALM: Kim, please go ahead.

2 BD. MEM. HUSEMAN: Yeah. Quick question here for  
3 you, Aaron. Thank you for your comments today.

4 You mentioned that from a protein standpoint, going  
5 into the petfood industry is kind of the market entry that  
6 you're looking to go into. Is that correct?

7 MR. HOBBS: We are looking at providing our products  
8 into all food and feed. That was just the example that I've  
9 given. We have a lot of interest as of late in that sector,  
10 but it is across all food and feed.

11 BD. MEM. HUSEMAN: Okay. And that's where I was  
12 going to go. Could you see this as a potential offset for a  
13 protein alternative into livestock feed?

14 MR. HOBBS: Absolutely. Absolutely. One of the  
15 largest livestock companies in this country, Tyson Food, just  
16 made a big announcement in a partnership with one of our  
17 members two days ago. So yes. We are working on that as well.  
18 Working through the AFCO process, the ingredient definition  
19 approval process. Really excited about where that's going and  
20 the momentum we have there. So --

21 BD. MEM. HUSEMAN: That is -- that's wonderful news.  
22 I think as we look at some of the barriers that we face in the  
23 livestock feeding aspect, and alternate protein sources, this  
24 has a lot of room for growth. So I look forward to chatting  
25 with you more, and hearing more about your progress too.

1 MR. HOBBS: I agree 100 percent. So thank you.

2 CHAIR POWELL-PALM: All right, Aaron. Appreciate it.

3 MR. HOBBS: Thank you.

4 CHAIR POWELL-PALM: Next up we have Emily Musgrave,  
5 followed by Harriet Behar.

6 We are going to take a break for five minutes, and do  
7 -- get some rest, get something to drink, and then after the  
8 break, we're going to come back with Nicole Dehne, followed by  
9 Maddie Kempner.

10 So Emily, the floor is yours. Please go ahead.

11 MS. MUSGRAVE: Good morning. My name is Emily  
12 Musgrave. And an organic regulatory manager at Driscoll's. As  
13 always, I would like to thank the NOSB for their tremendous  
14 commitment by serving on the Board. Before starting, I wanted  
15 to say what a treat it was to hear from so many cattle ranchers  
16 on Tuesday. I really appreciated their comments and the  
17 questions for them by the Board.

18 Although the organic community has many differences  
19 and great discussions that come from those differing opinions,  
20 we are a community with a common goal to advance and promote  
21 organic food and farming practices. And it's nice to remember  
22 and celebrate that.

23 Though there's always room for constant improvement,  
24 I appreciate the positivity coming from the Board, and the  
25 inclusivity that is being shown in these meetings. I have to

1 say the cattle ranchers upped the ante for clever comments, so  
2 we'll have to see if organic produce growers can match those.

3 Now, my comments today focus on the continued  
4 allowance of plastic mulch and covers, but I will state that  
5 Driscoll's supports the relisting of elemental sulfur, liquid  
6 fish products, lime sulfur, and sulfuric acid on the National  
7 List as well.

8 Additionally, I am voluntary member of the  
9 International Fresh Produce Association's organic committee,  
10 and Driscoll's supports the comments made by IFPA.

11 Plastic mulch is an essential tool for organic  
12 cultural control of weeds and disease, while aiding moisture  
13 retention and increasing water use efficiency. Plastic mulch  
14 is widely used by Driscoll's organic growers across all berry  
15 types, but particularly used by organic strawberry growers.

16 Driscoll's is actively working towards reducing our  
17 plastic footprint, and we know others in the agricultural  
18 industry are working towards the same goal. However, removing  
19 plastic mulch as a tool for organic growers without a viable  
20 alternative would be catastrophic for organic growers, who  
21 depend on plastic mulch to grow their crops, including organic  
22 strawberry growers.

23 Although plastic mulch is not currently being widely  
24 recycled throughout the industry, we are starting to see more  
25 options available and anticipate the recycling of plastic mulch

1 to keep increasing. This was not the case a short two or three  
2 years ago.

3 Recycling companies are using innovative technologies  
4 to come up with solutions for this problem. Driscoll's is  
5 working on recycling pilot programs of plastic mulch in  
6 California and Baja that have had success.

7 The widespread practice of recycling plastic mulch  
8 throughout the industry is a few years away, but there is hope  
9 on the horizon. Driscoll's will continue to partner with  
10 leaders on this issue to develop innovative ways to push the  
11 recycling of plastic mulch forward to become an industry-wide  
12 practice. In the meantime, the loss of plastic mulch as a tool  
13 would be catastrophic for the organic berry industry, and we  
14 urge the NOSB to relist it.

15 Driscoll's thanks the National Organics Standards  
16 Board for the opportunity to comment and their commitment to  
17 protecting the integrity of the program.

18 CHAIR POWELL-PALM: Thank you so much for your  
19 comments and for joining us today. Jerry has a question for  
20 you.

21 BD. MEM. D'AMORE: Emily, hello. How are you?

22 MS. MUSGRAVE: Good. Hello, Jerry.

23 BD. MEM. D'AMORE: Nice job. I just have one  
24 question and it's not a trick question. It's what leads a lot  
25 of my thinking and perhaps the thinking of others in terms of

1 how effective we can be in getting some movement on this topic.

2 And the question would be what percentage of your  
3 strawberries are organically grown?

4 MS. MUSGRAVE: That is a good question. So it does  
5 depend on which region you're talking about, right? Because we  
6 grow throughout California. We grow in Baja. We grow in  
7 Central Mexico. I will say, it's the highest in Baja, for  
8 sure. I think in Baja, actually, 100 percent of our  
9 strawberries are organically grown in Baja, but probably across  
10 the board, if you averaged it out, don't quote me for sure, but  
11 I want to say it's probably like 20-ish percent of our -- of  
12 all of Driscoll's strawberries are organic.

13 BD. MEM. D'AMORE: Thank you for that number. It's  
14 bigger than I would have guessed, and I would then have to say  
15 that your organization is probably much higher in that  
16 percentage than most. And the reason for the question is that  
17 it becomes a question to you is what are the chances that we  
18 can really move this needle as organic when conventional is  
19 right there.

20 And so the question I have is how much of your time  
21 do you spend with the conventional side, working on exactly  
22 this issue?

23 MS. MUSGRAVE: That is a really good question. So  
24 and speaking just to talking about plastic mulch, right?

25 BD. MEM. D'AMORE: Yes, ma'am. Yeah.



1 MS. MUSGRAVE: Yes. So actually, there's plenty. I  
2 mean, none of our -- none of the growers want to see the  
3 plastic mulch going to the landfill, right, whether you're  
4 organic or conventional. So I know we have plenty of growers,  
5 conventional and organic, plenty of conventional that were  
6 looking, you know, into biodegradable biobased mulch, plenty  
7 that want to do the trials in conventional to not have this  
8 mulch going to the landfill. So it's across the board.

9 I don't see any -- I mean, all the growers do not  
10 want this mulch going to the landfill. I mean, we work with  
11 organic and conventional across the board. And many of our  
12 organic growers also have conventional. So they'll -- you  
13 know, they both -- it goes both ways.

14 BD. MEM. D'AMORE: Emily, that's a great answer  
15 because my personal opinion is we will not move the needle  
16 unless we're all in this together.

17 MS. MUSGRAVE: Exactly.

18 BD. MEM. D'AMORE: Thank you.

19 MS. MUSGRAVE: Thank you.

20 CHAIR POWELL-PALM: Nate, please go ahead.

21 BD. MEM. LEWIS: Thanks, Emily. The question is as  
22 you kind of mentioned, there's a growth in availability  
23 recycling capacity. Do you envision there -- I mean, I'm  
24 trying -- do you think there's an open door to perhaps making  
25 recycling a requirement for use of plastic mulch sort of into

1 the future? Or is there some parameter there. Not trying to  
2 sort of pigeonhole you on that one, but more just trying to  
3 think about how we can encourage that practice.

4 MS. MUSGRAVE: That's a good question. The  
5 requirement -- I mean, maybe -- I don't think we're quite there  
6 yet on the requirement just simply because there's still not  
7 the facilities around to take it to. So I mean, I think that  
8 would be really tricky if you made the requirement and then  
9 growers were like, there's nowhere in the area that is going to  
10 take it. So that is a really good thought. And I think that's  
11 the right direction. I think we just need to make sure that we  
12 would be there, right, with enough facilities before you make a  
13 requirement, because otherwise, it would be a requirement and  
14 then, you know, growers couldn't meet it because there's not  
15 the recycling available. So but getting there, and a good  
16 though.

17 CHAIR POWELL-PALM: Jerry, please go ahead.

18 BD. MEM. D'AMORE: This is for Nate, if I may. As  
19 you ask that question, Nate, were you asking Emily a  
20 requirement into the organic program or a requirement into the  
21 overall conventional and organic program?

22 BD. MEM. LEWIS: Well, we don't really have much  
23 control over conventional ag, so --

24 BD. MEM. D'AMORE: But the answer, I think, drives a  
25 lot of our thinking; does it not?

1 BD. MEM. LEWIS: Sure. Yeah.

2 BD. MEM. D'AMORE: Okay. Thank you. Thank you very  
3 much.

4 CHAIR POWELL-PALM: All right. Thank you very much,  
5 Emily.

6 Next up we have Harriet. And then we're going to  
7 break for five minutes. And then Nicole Dehne, Maddie Katner,  
8 and Jaydee Hanson after the break.

9 So Harriet, if you are there, the floor is yours.

10 MS. DEHNE: Hi. I am Harriet Behar with the Organic  
11 Farmers Association. I'm a past NOSB chair and a certified  
12 organic farmer, and a longtime advocate for organic integrity.  
13 Please refer to my written comments, as well as those of the  
14 Organic Farmers Association and the National Organic Coalition  
15 for more detail on these issues.

16 Vaccines. The current rule mandates a GMO vaccine --  
17 in order for a GMO vaccine to be allowed in organic, it must be  
18 reviewed, approved, and placed on the National List. The  
19 National Organic Program is allowing accredited certifiers to  
20 ignore this part of the rule, and some allow GMO vaccines or do  
21 not even inquire what is the GMO status of vaccines used on  
22 organic livestock.

23 It is a dangerous precedent to allow the section of  
24 the rule to be arbitrarily ignored. The previous NOSB  
25 recommendation to allow GMO vaccines if there is no

1 commercially available, non-GMO vaccine, is a workable solution  
2 to this issue, and the current NOSB should pressure the NOP to  
3 implement this as soon as possible.

4 Consistent location identification. The proposal has  
5 some merit, but organic farming is very diverse, with producers  
6 having various knowledge and willingness to engage with  
7 technology, as well as a variety of ways of farming their  
8 various fields. The current proposal mandates the use of GMOs  
9 coordinate -- GPS coordinates for all organic locations. And  
10 this proposal should go back to subcommittee and remove the  
11 mandate.

12 This should be seen as one of the many ways to locate  
13 organic production. There are many scenarios for both small  
14 and large farms where this mandate would put a significant  
15 burden on farmers.

16 Excluded methods. The recent secure rule by APHIS,  
17 which does not require -- does not, excuse me, recognize gene  
18 editing, such as crispr, as genetic engineering. The USDA has  
19 not required a marker to be put in these gene-edited seeds. So  
20 use of testing to determine if there has been gene editing is  
21 impossible.

22 The developer of the seed does not need to inform  
23 their buyers that the crop was gene edited. Our organic  
24 friends in Canada have a similar rule, and we and they are  
25 concerned that protecting organic from this form of genetic

1 engineering will become very difficult.

2 Please pressure the NOP to adopt the NOSB  
3 recommendation on excluded methods, which state gene editing is  
4 considered genetic engineering in organic. The CACS  
5 subcommittee needs to have a gene-editing issue on their work  
6 agenda.

7 Hydroponic. The members of the Organic Farmers  
8 Association have consistently identified the false organic  
9 certification of hydroponic as a priority issue. If you noted,  
10 many of the written public comments also expressed this same  
11 concern without even being on the agenda. This is not a  
12 settled issue.

13 Thank you very much.

14 CHAIR POWELL-PALM: Questions for Harriet? Amy,  
15 please go ahead.

16 BD. MEM. BRUCH: Yeah, thanks, Nate. Harriet, thank  
17 you for your time today. Appreciate the written comments you  
18 represented, and you submitted, and your oral comments also,  
19 and your last service as Board chair.

20 I have a question just to unpackage a little bit  
21 about, you talked about the consistent or standardized location  
22 information document that we have for CACS, the proposal. In  
23 terms of GPS coordinates, we also mentioned that it could be  
24 street addresses, parcel numbers, and legal addresses because  
25 those could eventually lead to geocodes. And when we heard

1 from the plain's community last public comment process, parcel  
2 numbers seemed to be something that farmers were knowledgeable  
3 about and worked with, just because you have to pay your  
4 property tax.

5 Do you think those are acceptable also? The street  
6 addresses, parcel numbers, or legal addresses like the Township  
7 range section?

8 MS. BEHAR: Yes, I do. Especially in concert with  
9 more than one. I mean, just obviously a street address  
10 doesn't, you know, for 1,000-acre farm is not going to tell you  
11 which field grew soybeans. But a group of those -- but this  
12 mandate of having GPS location be part of the mix, I'm not  
13 against it being part of a larger mix, but to have it be the  
14 one mandate, I think that has gone a little bit too far.

15 And actually, even in a larger field, you can stand  
16 in one part of a field and get at GPS coordinate, and then  
17 stand in the south side of the field and have a totally  
18 different GPS coordinate. And then farmers, as you know, they  
19 break up their fields. And one year, it's 5A, and then the  
20 next year, you know, it's now 5A(1). And so there's a lot of  
21 little issues, having been an organic inspector, that I can see  
22 having the GPS coordinate being a mandate be -- just become  
23 kind of a nightmare in tracking those numbers.

24 BD. MEM. BRUCH: Okay. Thank you.

25 CHAIR POWELL-PALM: I just have a quick question for

1 you, Harriet. What language would you like to see in this  
2 document to clarify that this had nothing to do with members'  
3 burden, it is only on certifiers?

4 MS. BEHAR: Well, I am a little bit concerned too  
5 that people in the Plain community may not want that. I've  
6 even had them tell me they don't want aerial photographs of  
7 their farm.

8 So I just think that having it be a mandate -- I  
9 mean, the certifiers can say if this is working for you, we  
10 would like it. But to mandate it of every single farmer in  
11 every single field and every single location, I think will be a  
12 big burden not just only on farmers, but on certifiers too.

13 So I'm not against it. I just don't think it should  
14 be a mandate.

15 CHAIR POWELL-PALM: All right. Mindee, please go  
16 ahead.

17 VICE CHAIR JEFFERY: Thank you, Harriet. Did I hear  
18 you say that CACS should have gene editing on their work  
19 agenda? And if you did, would you mind saying a little bit  
20 more about what the outcome would be there?

21 MS. BEHAR: Yes. So APHIS, the Animal Plant Health  
22 Inspection Service of the USDA two years ago, or maybe it was  
23 just a year ago, has approved gene editing to not be labeled,  
24 and they've kind of said that that basically -- if it was not a  
25 plant pest, or if the developer determined that it could have

1 been accomplished through natural hybridization or natural  
2 mutation, that the USDA does not consider it genetic  
3 engineering.

4           And since the NOP is under the USDA, if we want to  
5 maintain gene editing as an excluded method in organic, we need  
6 to have the NOP accept that NOSB recommendation, which  
7 recognizing gene editing as organic.

8           I became first aware of this because someone from  
9 Canada contacted me because they just recently had this happen  
10 to them as well, that there will be no knowledge of people  
11 buying basically non-organic seed. I don't even know if those  
12 who were growing organic seed would know if their foundation  
13 seed had been gene edited, because it would not be considered  
14 genetically engineered.

15           And the USDA, they could have said that there would  
16 have had to have been a marker in there so it could've been  
17 tracked, but they did not mandate that. And so therefore,  
18 there was no way to test to find out if it's been gene edited.

19           Right now, the only commercially available crop is  
20 mustard greens. They gene edited it to make it less bitter.  
21 But wheat, corn, rice are all in the pipeline. So this is  
22 something that will come to the forefront fairly quickly that  
23 right now the U.S. Department of Agriculture recognizes gene  
24 editing as not genetic engineering if it met those first  
25 criteria.



1           VICE CHAIR JEFFERY: Yeah. Thank you. So do you  
2 think that there's something very specific CACS can do to help  
3 prescribe our ability to find those things through the  
4 certification and inspection process? Or you didn't have  
5 another more specific suggestion there? Honest question.

6           MS. BEHAR: Well, I think you need to look into the  
7 issue. I think you need to talk to people in Canada, who are  
8 dealing with the same issue, very concerned, especially that  
9 their wheat will be gene edited, and that maybe what's going to  
10 happen in their marketplace is that the EU may say, since we  
11 can't track whether your wheat was gene edited, we're not going  
12 to accept any organic wheat out of Canada. This is what their  
13 concern is. And I really do think that the National Organic  
14 Program needs to stand up and say that under organic, we  
15 consider gene editing a genetic engineering practice.

16           This is when the gene is just edited. No other gene  
17 is inserted from a different species or breed. And it -- you  
18 know, basically, they said if someone determines that it could  
19 have been done naturally -- it could have happened naturally,  
20 that it's not considered genetic engineering.

21           CHAIR POWELL-PALM: Allison, please go ahead.

22           BD. MEM. JOHNSON: Thanks for your commentary and  
23 your leadership in organic. We really appreciate you.

24           Back to locations, I take seriously your concern  
25 about really causing problems unnecessarily, and having been in

1 the certifier seat, I can think of instances where, you know,  
2 very minor requirements spiral into something that was messy,  
3 and it didn't need to go that way.

4           So I'm wondering if there's language that we could  
5 add to the recommendation that provides a little room for a  
6 religious exemption, or in those rare circumstances where it's  
7 not appropriate to have a GPS location, that let certifiers  
8 know that they can find some other reasonable accommodation.  
9 The generally, the expectation is GPS locations, but create  
10 some sort of little caveat there to provide comfort and  
11 flexibility. Would something like that address your concerns?

12           MS. BEHAR: Yes, it would. And I think you just have  
13 kind of a menu of the various items that can be used, and it's  
14 really up -- if the certifier can't figure out where the field  
15 is, that is a problem. And so it could be a mix of aerial  
16 photographs, GPS or not, parcel number, section and town. I  
17 mean, addresses. All of those things. And that's a menu. And  
18 then if you only need three of the five to be able to locate  
19 it, then that's sufficient. But if for some reason you can't  
20 find it, you know, then you have to add more in that menu.

21           BD. MEM. JOHNSON: Yeah. I think what we're going  
22 for is like simplicity and consistency. And so I'm trying to  
23 figure out if there's some narrow addition that we could add  
24 there that gets at religious concerns, cultural concerns. Like  
25 I wouldn't want this requirement to be the deal breaker for any

1 farm. So what can we do to make sure that it's not, and still  
2 get at that simplicity and consistency goal.

3 MS. BEHAR: Well, I think just having it be a  
4 mandate, you know, moves it to this higher -- because there's  
5 no mandate that the township and parcel number has to be there.  
6 There's no mandate, you know, for an aerial photograph even.  
7 But now you've made GPS the way of finding organic locations.  
8 And I think that's a problem. It should be part of a suite of  
9 options for the certifiers to use and for the farmers to  
10 provide.

11 BD. MEM. JOHNSON: Okay. Thank you for clarifying.

12 CHAIR POWELL-PALM: Other questions? All right.  
13 We're going to go on break. Thank you, Harriet. We're going  
14 to go on break for five minutes.

15 MS. BEHAR: You're welcome.

16 CHAIR POWELL-PALM: Let's come back at 18 after. And  
17 after the break, we're going to have Nicoe Dehne, Maddie  
18 Kempner, and Jaydee Hanson.

19 (Off the record at 2:13 p.m.)

20 CHAIR POWELL-PALM: And we are back, folks. I hope  
21 you had a good break.

22 First up, we're going to start with Nicole Dehne,  
23 followed by Maddie Kempner, and then Jaydee Hanson. Nicole, if  
24 you're there, the floor is yours.

25 MS. DEHNE: Nate, thank you. Can you all hear me?

1 MS. ARSENAULT: Can I have you pause just for one  
2 second because I don't see all of the Board members back yet.  
3 Nate runs faster than everyone.

4 MS. DEHNE: He was very accurate. He was back at  
5 2:18.

6 MS. ARSENAULT: Nate, just FYI, Maddie Kempner was  
7 unable to join, so you can skip her comment.

8 CHAIR POWELL-PALM: Okay. Thank you. Just give me  
9 the thumbs up, Michelle, when we're ready.

10 (Pause.)

11 MS. ARSENAULT: Five minutes is not very long, Nate,  
12 I have to say.

13 CHAIR POWELL-PALM: It's not. No. I just wish the  
14 comments weren't so dang good this round. Gosh, this is some  
15 good conversation, but it takes time. So we're not late.  
16 We're right where we should be, but we're running fast.

17 All right. We've got Logan, and Dilip, and Carolyn,  
18 and Allison. Allison said she's here. Okay.

19 MS. ARSENAULT: All right. Thanks, Nate. Thanks.

20 CHAIR POWELL-PALM: All right. Nicole, please go  
21 ahead.

22 MS. DEHNE: Okay. Sorry. It took a little bit to  
23 unmute there. So my name is Nicole Dehne. I'm the  
24 certification director for Vermont Organic Farmers, LLC. We're  
25 the certification agency that's owned by NOFA Vermont. We

1 represent close to 750 organic producers in the State of  
2 Vermont. And I do want to thank the NOSB and the NOP for all  
3 of your hard work. We all appreciate it.

4           So I'd like to comment today not on any specific  
5 agenda item, but to discuss a broader topic of concern that  
6 we're noting in Vermont, but I believe is also felt beyond our  
7 state, and this is the increased record keeping and paperwork  
8 burden on certified producers.

9           So over the decade, all the comments here today,  
10 right, we're really focusing on working hard to reduce fraud  
11 and improve enforcement of the organic regulations. And I  
12 certainly don't want my comments to be misconstrued as not in  
13 support of that.

14           Obviously, this work as culminated in the recent SOE  
15 rule, but we are now at a crossroads for how we implement and  
16 interpret this rule. So I'm concerned that if we use this rule  
17 to require more records and paperwork, we are going to be  
18 discouraging small farmers and processors from getting  
19 certified, and that we're likely going to see currently  
20 certified producers drop their certification.

21           So the vast majority of our farmers in Vermont  
22 wholeheartedly believe in organic farming practices. So  
23 whether, you know, certification existed or not, they would be  
24 using these practices on their farms and in their processing  
25 facilities, but many of them are struggling with keeping up

1 with the record keeping requirements that we're demanding of  
2 them, and ironically, we could lose these growers, despite  
3 their alignment with the practices.

4           And I think it's really important to keep in mind  
5 that records are clearly important. Records and audits are  
6 important. I'm not saying that. But they're not the whole  
7 story, right? Records and paperwork can be falsified.

8           We recently had our NOP audit, and I had our auditor,  
9 you know, somewhat in jest say to me, you know, Nicole, if it  
10 isn't written down, then it didn't happen. But like the  
11 absurdity of that idea also really struck me, because obviously  
12 things can be written down that don't happen.

13           So putting too much of an emphasis on the paperwork  
14 means that we could be missing what's actually occurring on the  
15 farm. And I'm imagining an inspector furiously calculating dry  
16 matter intake from pasture, but you know, not looking up at the  
17 actual pasture to determine if there's enough grass on the  
18 ground to meet that number, right?

19           So my point is that paperwork and audits can tell you  
20 some things, but they can't tell you everything. So I do have  
21 suggestions. I think we need to invest in education. I think  
22 our producers are going to be most successful when they adopt  
23 organic practices because they believe in them, because they  
24 see that they work versus that they're just seeing the benefit  
25 of a higher price. The top is a great start in this direction.

1 But we also need to have a sound and sensible approach when  
2 we're using record keeping, noting that it is a tool and that  
3 we can overuse a tool. So we don't want to only depend on  
4 records to prove compliance. We want to have a 30,000-foot  
5 view on why we're asking for the record and what we're trying  
6 to verify, right?

7 And then most --

8 CHAIR POWELL-PALM: Go ahead and finish up.

9 MS. DEHNE: Okay. Thank you.

10 Most importantly, I really want to stress, I think we  
11 need to start treating operations differently. So I feel like  
12 SOE is giving us an opportunity to assess each farm and their  
13 processing facility, that they're at a different risk level,  
14 right? And we use that risk level to determine what proof we  
15 need to verify their practices.

16 So yes, some operations that are commodity operations  
17 that are complex supply chains, they're going to be required to  
18 provide more proof and paperwork, while those farms selling  
19 direct to consumers will provide less.

20 And I'm happy to talk about the GPS requirement  
21 proposal, and how it kind of relates to this too. Thank you.

22 CHAIR POWELL-PALM: All right. Thank you. Questions  
23 from the Board?

24 I'm going to ask you a very -- go ahead, Kim.

25 BD. MEM. HUSEMAN: I'm going to open the floor,

1 Nicole, for you to go ahead and talk about your suggestions on  
2 GPS.

3 MS. DEHNE: Thank you, Kim.

4 Well, I was just thinking as we were talking about  
5 this, as this was being discussed, that, you know, we don't  
6 have that problem in Vermont of locating fields. Like, that is  
7 just not something that we're dealing with as an issue. And I  
8 was sitting here wondering why.

9 I think partly, we're a little bit more developed  
10 here in the east, in Vermont, so there's going to be less of  
11 residential areas. The maps that we're asking for are getting  
12 us, you know, the intersections of roads and we can easily find  
13 them, both for unannounced inspections if we needed to do that,  
14 but most of the time during our inspections, the producer is  
15 driving us to all the fields.

16 So, like, that's a good example of how, like, we're  
17 not actually going to catch fraud in Vermont by requiring that,  
18 and it might just be an additional burden that doesn't actually  
19 solve the problem.

20 So my real point is like we -- I think we need to  
21 stop thinking that every operation needs to be treated in the  
22 same way and really evaluate the risk and say, like, hey, this  
23 is the record keeping required for this particular operation  
24 because their risk is low.

25 CHAIR POWELL-PALM: Kyla has a question for you.



1           BD. MEM. SMITH: Hi, Nicole. Thanks so much for your  
2 comments. I'm like steeped in SOE myself, so they're really  
3 resonating with me. I'm like forming this thought as I'm,  
4 like, speaking so bear with me if it's a little clunky.

5           You are speaking about the requirements more so in  
6 how they might -- how we might see attrition from certified  
7 farmers. Also, within CACS, we have that transition document.  
8 And so I've been thinking about this throughout the comment  
9 webinars this week, but you know, I do a lot of the mediation,  
10 informal mediation that PCO and they almost all of them are  
11 because of record keeping.

12           And so it's a real -- seeming like a real challenge  
13 for those who are certified and I know that it is a barrier for  
14 certification. And so I guess I'm just, like, wondering about,  
15 like how -- like I think someone's also talked about like  
16 transitioning farmers. I think maybe that was Mike Dill.  
17 Anyway, he was like talking about transitioning farmers versus  
18 transitioning land. And so I guess I'm just wondering about  
19 what does that -- how does record keeping and having better  
20 record keeping systems come into play to not let that be a  
21 barrier to transition?

22           MS. DEHNE: This is transition. I think -- I mean,  
23 all of this transition work, I think, is going to benefit our  
24 certified producers too. So I think we do need, as an  
25 industry, since we're increasing the level of record keeping

1 requirements, and we are. In the old days, we used to say, do  
2 you have records that we can audit? You know, like are they  
3 auditable. And now we're actually doing the audits. And I  
4 think those are good improvements, but we have to admit that  
5 they have changed.

6 And so I think really helping our producers to  
7 understand the requirements, and have a better understanding of  
8 what to expect at inspections, you know, so they can be  
9 prepared. Anything that we prepare for transitioning producers  
10 is going to help our certified producers too. But I really  
11 think that it's very easy for us as certifiers and inspectors  
12 to just require a record because it's easier to say that it's  
13 needed than it's not needed, right?

14 But if -- but like an example would be -- we have a  
15 lot of producers who harvest for a specific market. So they  
16 might say, like, I've got an order from the co-op for carrots,  
17 so I'm going to harvest for that market, right? So their sales  
18 records, then, are essentially their harvest record because it  
19 shows what they've harvested.

20 So like we need to not say, you also need a harvest  
21 record. We can say, sales records can be the information that  
22 we need to verify your harvest. Listed the date that you  
23 harvested it, listing the amount you harvested, just -- is it  
24 the same date you sold it.

25 So taking that 30,000-level foot view to say hey,

1 this makes sense. And I think part of the way we're going to  
2 have to do that is to say what are we trying to verify here,  
3 and then ask ourselves whether we -- what we need to see.

4 CHAIR POWELL-PALM: I just wish we could dedicate the  
5 rest of the day to this topic because I have so many ideas and  
6 questions right now. So we will follow up. Will you be in  
7 Providence, Nicole?

8 MS. DEHNE: Yes. And I'm happy to talk more.

9 CHAIR POWELL-PALM: Okay. We should grab a coffee.

10 I would just throw out there this question -- I mean,  
11 these are the questions. So just thank you for bringing this.  
12 I think this is really where we're at right now is how do we  
13 not let perfect be the enemy to the good. How do we really  
14 make sure that we're actually getting at, you know, integrity.

15 And I think I would just throw out there, what is the  
16 role of consultants here. Are we putting too much on farmers  
17 for them to even be managers of their own OSBs, or should there  
18 be more push of consultants to take that burden off. Not sure.  
19 But I would love to explore that with you at some time.

20 Thank you again for your comments. Appreciate you.

21 Next up we've got Jaydee Hanson, followed by Steve  
22 Ela, and then Anne Ross. Jaydee, if you're there, the floor is  
23 yours.

24 MR. HANSON: Thank you. I always have to unmute  
25 first.

1           It's nice to see you again, and nice to see the whole  
2 board, and thank you all for your long hours of work.

3           We've -- the Center for Food Safety has been closely  
4 involved with the National Organic Coalition comments, and we  
5 want to support those in addition to some add-ons that we've  
6 made.

7           We're focused on three things. My colleague, Sylvia  
8 Woo, is going to talk about inerts in pesticides and I'm going  
9 to talk plastics and GMO vaccines.

10           The Center encourages the NOSB to initiate  
11 discussions on setting priorities for reducing plastic used in  
12 organic production and handling, and suggests you start the  
13 process by breaking the discussion into two parts. First,  
14 plastic use and production, and second plastics used in  
15 packaging.

16           Within those two areas, need to identify which  
17 plastic uses are essential and which can be moved away from.  
18 For right now, plastic pipe, and greenhouse trays, and maybe  
19 plastic mulch are essential, but I would be careful about  
20 assuming how much of any plastic is recyclable. In communities  
21 across the U.S. and across the world have found that the  
22 plastic manufacturers were misrepresenting the market for  
23 recycling their plastic.

24           The other area that should be looked at is the fate  
25 of micro and nanoplastics on farms. We need to understand what

1 these plastics are doing to our soils. We already don't allow  
2 composts made from biodegradable compostable plastics, but  
3 other sources of plastics and soils that we should be aware of  
4 and assess.

5 We've talked to you before on problems of PFAS (ph)  
6 and our organization is pushing the EPA and the Food and Drug  
7 Administration to greatly curtail the use of ortho phthalates,  
8 PFAS, and bisphenols. We have worked a lot on that, and I'll  
9 just urge you to read our things.

10 We think the 2019 recommendation on vaccines needs to  
11 be implemented, and I second what Harriet Behar said on other  
12 excluded methods.

13 CHAIR POWELL-PALM: Thank you for your comments.  
14 Questions from the Board?

15 All right. Thank you very much, Jaydee.

16 MR. HANSON: Thank you very much, and unfortunately,  
17 we're going to be talking about plastics and excludes methods  
18 for a long time. And I'll look forward to seeing you in  
19 Providence. Bye.

20 CHAIR POWELL-PALM: All right. Take care. Thank  
21 you.

22 Next up, we have Steve Ela, followed by Anne Ross,  
23 and then Linley Dixon.

24 Steve, I have just been waiting for that background.  
25 Oh my gosh, good to see you.

1           MR. ELA: Good to see you as well. And I just want  
2 to say, it is a pleasure and a privilege as always to see you  
3 all. It's great to see all the familiar faces.

4           So good afternoon. I'm Steve Ela with the National  
5 Organic Coalition, NOSB specialist, and organic fruit grower  
6 here in western Colorado, as well as a former NOSB member.

7           NOC appreciates the work of the Board that  
8 distributed a document on inert materials for public comment,  
9 despite the fact that it could not be included in the formal  
10 NOSB material packet for the fall. The Board's diligence and  
11 work on this topic is noted and appreciated.

12           Inerts should be individually listed on the National  
13 List. OFT requires that materials be listed individually. The  
14 National List is inherently a positive list, meaning that  
15 synthetics must be listed in order to be used. So accept a  
16 broad category listing and then expect the organic community to  
17 petition for prohibition of certain materials turns the list  
18 into a negative list, something that runs against the basic  
19 principles of the use of synthetics and organics.

20           It also puts the onus on the organic community to  
21 petition to keep endocrine disrupters and carcinogens out of  
22 organic production, when in fact, the onus should be on the  
23 user to show that the synthetic is needed.

24           Furthermore, if only a reference to a broad EPA  
25 category is used, the organic community has no way of even

1 knowing what materials are being used, since only a material  
2 review organization would have that information.

3           If we simply move from list 4 to a reference to  
4 another EPA category, we are taking proverbial frog in the pot  
5 of boiling water, and simply moving it to another pot of  
6 boiling water, rather than rescuing the frog. I'd be happy to  
7 talk more about this if you have questions.

8           NOC recognizes that individual listings will take  
9 work, but we have provided ideas for reducing the Board  
10 workload in our written comments. For example, materials could  
11 be grouped into classes, and reviewed as a class, similar to  
12 how the Board treats coppers and flooring materials. Each  
13 material is specifically listed on the list, but the Board does  
14 one sentence write up for the group, and then makes any  
15 specific notes upon materials slightly different.

16           On a separate note, NOC urges the Board to ask for a  
17 work agenda on organic slime management. Slime were primarily  
18 admitted from the OLPS and should be covered in similar ways.

19           NOC also urges the Board to start work on the use of  
20 excluded methods and fermentation. This is a rapidly expanding  
21 field, and one that we must get a handle on before we  
22 inadvertently start allowing excluded methods in organics  
23 because we simply don't know where and when they are being  
24 used.

25           A prime example is the work agenda item on

1 biodegradable, biobased mulch film, where it is acknowledged  
2 that excluded methods are being used to make the films. If we  
3 don't establish a policy on the use of excluded methods on  
4 permutations soon, we risk losing control of the whole topic.

5           Finally, NOC will continue to raise the issue of the  
6 potential environmental damage on marine ecosystems from  
7 harvesting of marine materials for use on organic farms. This  
8 applies specifically to liquid fish and alginates, but also  
9 more broadly to any marine materials used in organic products.  
10 We support the use of these alginates and liquid fish, we just  
11 don't support marine degradation and their use.

12           Since National Organic Coalition is known as NOC, I  
13 will finish with a knock knock joke. So, Nate, knock knock?

14           CHAIR POWELL-PALM: I wanted to make sure I was  
15 unmuted. Who's there?

16           MR. ELA: Gum.

17           CHAIR POWELL-PALM: Gum who?

18           MR. ELA: Gump-tion. The Board should have the  
19 gumption to add annotations to all the gums and other materials  
20 on 605, requiring the use of organic materials when they are  
21 commercially available. We have seen organic gums used in a  
22 variety of dairy products from major producers, showing that  
23 they are certainly commercially available. Thank you.

24           CHAIR POWELL-PALM: You know, if we required a knock  
25 knock joke after every single comment, I just only imagine the



1 wonderful world we would live in. So thank you, Steve.

2 MS. ELA: Well, I'm inspired by Kim's Dad jokes.

3 CHAIR POWELL-PALM: Dilip, please go ahead.

4 BD. MEM. NANDWANI: Thanks, Steve, for your wonderful  
5 comments. I really appreciate that.

6 I'm just wondering about NOC's position on gene  
7 editing, since you had mentioned excluded methods. I heard  
8 earlier that gene editing, it might be considered as a genetic  
9 engineering. I don't know it's in Canada or elsewhere also.  
10 So could you please just a little bit elaborate on that gene  
11 editing, NOC's position, thank you.

12 MR. ELA: Yes. I think NOC is very concerned about  
13 the use of gene editing, not following traditional breeding  
14 techniques, and certainly crisper is of concern and something  
15 we're talking a lot about, and especially we'll have some calls  
16 scheduled here shortly with talking about the Canadian side of  
17 things.

18 I think one of the things that -- like Jaydee Hanson  
19 and Michael Hanson have mentioned, or didn't mention is that  
20 we're seeing more issues with the crisper technology as not  
21 being quite as clean as it was originally made out to be. And  
22 so we're seeing some kind of mutagenic, carcinogenic effects  
23 within the plants or animals where that's been used.

24 And so that raises concerns for us that while it has  
25 been touted to be very clean, very precise, maybe it's not

1 quite true that way. So it's something we certainly want to  
2 keep an eye on. And we certainly don't want to have  
3 inadvertent use of some of these gene edited plants or seeds in  
4 organic production without people knowing that it's happening.

5 BD. MEM. NANDWANI: Yeah. Thanks. I think the gene  
6 adding or removing, it's genetic engineering. Just a thought  
7 very quick. Thanks again.

8 MR. ELA: Agree.

9 CHAIR POWELL-PALM: Nate, please go ahead.

10 BD. MEM. LEWIS: Thanks, Steve. I continue to hear  
11 commenters share their opinion that OPA and National List  
12 criteria require inerts to be listed individually. And I'm  
13 curious what your thoughts are on how that contrasts with all  
14 the other lists that we have on the National List, and whether  
15 those are just the next -- it's not target, but those are the  
16 next things we'll need to unpack.

17 Because we have lots of classes of materials  
18 reference -- I mean, even in 601, we've got dormant oils,  
19 pheromones, micronutrients, right? And so we do use the list a  
20 lot -- the concept of list a lot. So what's unique about  
21 inerts for why we need to list those ones individually?

22 MR. ELA: I guess I would disagree somewhat. I think  
23 the National List is primarily of specific materials and that  
24 the exception is referencing to a list. And I would even say  
25 dormant oil is fairly specific. I mean, there are -- that is a

1 fairly tight category. It's not as broad as maybe you say.

2           So I would say, you know, we -- those are the  
3 exceptions and that, you know, they were often used as a  
4 shorthand to get things done early on when resources were  
5 scarce. So I don't think that we should let the fact that  
6 there are still other lists on the National List deter us from  
7 doing better at what we're doing now, and especially given the  
8 inert situation where it's a defunct list, I think we need to  
9 move ahead on that.

10           And I think it would be wrong to say that, well,  
11 we're going to ignore OFTA yet again. You know, we can chip  
12 away at these things, and now is the time for inerts.

13           I also think -- you know, I've heard a lot about  
14 essentiality and the question of confidential business  
15 information, like how would the Board decide if an inert is  
16 essential if it's confidential. The reverse happens though.

17           If a stakeholder is submitting a petition to prohibit  
18 an inert, how are they going to know about essentiality? I  
19 mean, it's -- that's going to be a problem whichever side we  
20 look at it, whether they're listed or not listed. So I think  
21 NOC's push is let's have more transparency. We want to be able  
22 to know what materials are being used in organics, because you  
23 can't submit a petition on a material that only an MRO knows is  
24 being used.

25           So we -- it's just very difficult to be able to track

1 it. And we thank OMRI for putting together the list that we're  
2 all referencing of what materials are being used. Otherwise,  
3 we -- none of us would be able to even talk about this.

4 CHAIR POWELL-PALM: Amy, please go ahead.

5 BD. MEM. BRUCH: Yeah, thanks, Nate. Steve, hi.  
6 Good to see you again. Thanks for your prior service as Board  
7 Chair, and for all the comments you helped write this go  
8 around.

9 Anyway, I wanted to ask you on risk, so this is  
10 regarding NOC's comments on residue testing for global supply  
11 chain. A lot of certifiers point to using the matrix -- to  
12 certify our matrix for risk and there's many points about it,  
13 depending on crop, region.

14 There's a point in it that says about split or  
15 parallel operations. One trend that I'm noticing is that  
16 operations are organizing, for various reasons, conventional  
17 production under one company name, and organic production under  
18 another. And I believe you mentioned, you know, maybe  
19 expanding this to handlers. I think they're organized and can  
20 be organized.

21 Similarly, if that circumvents them being included in  
22 the risk umbrella assessment, do you have ideas on how to  
23 evaluate these mixed production operations, even if they aren't  
24 declaring that they're mixed production?

25 MR. ELA: I think that's a great question. And I

1 think the first thing is, you know, the inspection. When you  
2 go in and the company is organized under two different names to  
3 avoid being split or parallel, and you go into the warehouse,  
4 and it's obvious that there is not segregation or that the --  
5 you know, the two things are being run simultaneously in the  
6 same warehouse, then I think the inspector has to raise some  
7 questions and say, well, you know, how are you keeping these  
8 things separate, even if it is from a different company, you  
9 still need to designate and show how this is separate.

10 And that might -- you know, the inspector should  
11 raise a risk flag and say, you know, this is an operation that  
12 is in a -- you know, in a split facility, and you know, that  
13 risk should be, you know, rated higher.

14 I mean, I will say we rent some warehouse space from  
15 a food hub that has -- you know, that deals with conventional  
16 and organic products, and it's going to be a challenge for them  
17 to certify, but it's going to be a good thing because it's  
18 going to guarantee that organic integrity. And I think that's  
19 really important.

20 BD. MEM. BRUCH: Okay. Thanks, Steve. Appreciate  
21 it.

22 MR. ELA: I think the inspection is going to be real  
23 key in that, in identifying are there things next to each other  
24 that may be contaminated or commingled, or are they physically  
25 -- are there physical barriers keeping them separate.

1 CHAIR POWELL-PALM: Brian, please go ahead.

2 BD. MEM. CALDWELL: Yeah. Hi, Steve. Glad that  
3 you're here. Looking forward to hopefully talking with you  
4 quite a bit next week. But I'm wondering if you could share  
5 with the group some of your insights from all your past work.  
6 And I realize that -- I haven't let you know about this at all,  
7 so this -- if you can't answer it, it's fine.

8 But I'm wondering what do you think is the potential  
9 for NOSB and the NOP program to make requirements that sort of  
10 go beyond the other governmental requirements, like  
11 specifically. Could we do things like require that inert  
12 ingredients be publicly disclosed in organically approved  
13 pesticides, even though that's sort of, you know, privileged  
14 knowledge in other uses; or could we require for instance that  
15 any plastics used in organics be verified by the manufacturer  
16 to not include PFAS and, you know, BPA and phthalates, that  
17 sort of thing, things that we know are dangerous components?

18 So just again, I apologize for just kind of springing  
19 this on you, but I'd love to hear your thoughts.

20 MR. ELA: No. It's a great question, Brian. And I  
21 think -- I mean, I think it's complex. You know, I don't think  
22 the program has the authority to usurp EPA on pesticide  
23 labeling. That is not within our jurisdiction. But we do have  
24 the authority to say that synthetics used in organics have to  
25 be on the National List. That is very clearly within OPA. So

1 we can't change the pesticide labels, but we can say if an  
2 inert is being used in organic and it is a synthetic, it needs  
3 to appear on the National List and it needs to be reviewed.

4           So we may not know where that inert or what product  
5 that is being used in as an end user, you know, if I'm spraying  
6 copper, or virus, or whatever. But I would at least know the  
7 subset of inerts that are being -- that are potentially there,  
8 and I would be able to, you know, assess risk as an end user.

9           I mean, I -- you know, I love being an organic  
10 grower. We transitioned from conventional because I don't have  
11 to wear all the stuff. But -- and I look at the active  
12 ingredients, and I assess risk when I spray them of  
13 environmental risk, and personal risk, and health risk, and I  
14 tell my consumers that. That if I -- if there's an inert in  
15 that product that's a carcinogen, I don't know. And if it was  
16 on the National List, at least I would know it's somewhere in  
17 some product, and we might be able to inquire further.

18           So I think it's -- just as a consumer or an end user  
19 of pesticides, I'd like to know what I'm spraying.

20           BD. MEM. CALDWELL: And just very quickly, any  
21 thoughts about the plastic example that I gave as well?

22           MR. ELA: Yeah. Plastic is kind of similar. I  
23 think, there again, we have some authority. We can't usurp FDA  
24 overall, except that we still do have authority over  
25 contamination of organic products. And so, you know, if we see

1 a PFAS or some kind of product that's going to be a problem on  
2 organic soils or in organic packaging, yeah, I think we do have  
3 authority over that to say, no, we're going to prevent  
4 contamination, and that's where OFTA does kick in.

5 BD. MEM. CALDWELL: Great. Thank you so much, Steve.

6 CHAIR POWELL-PALM: Other questions for Steve?

7 Mindee, please go ahead.

8 VICE CHAIR JEFFERY: Thanks, Steve. Pardon me if I'm  
9 wrong, you do a lot of farmers markets?

10 MR. ELA: Just a few.

11 VICE CHAIR JEFFERY: Yeah. So in your conversations  
12 with consumers when they ask you why organic, what do you --  
13 how does that land for you, and how do you inspire them?  
14 Because I mean, I hear this question from farmers a lot, and  
15 I've dealt with that question a lot as a retailer. So I've  
16 tried a lot of different strategies. So I'm just curious.  
17 What happens for you out there?

18 MR. ELA: That's a great question. Yeah. I spend  
19 every weekend at farmers markets, and we do multiple ones. So  
20 yeah, I think -- it's a great question. It's one I've  
21 struggled with over the years. And my answer now is that, you  
22 know, why organic? Why is it higher priced? And my answer is  
23 because we're internalizing externalities. And to put that in  
24 simpler words, I'm saying we are trying to keep soil on our  
25 farms so you're not having to dredge the Mississippi or repair



1 gullies. We're trying to prevent nitrate contamination of  
2 water so you're not having to treat the water in Des Moines for  
3 nitrates.

4 We're trying to keep all the nutrients where they're  
5 supposed to be so we don't have the dead zone in the Gulf of  
6 Mexico. And I just basically look them in the eye and say your  
7 tax dollars are subsidizing what agriculture externalizes  
8 through water treatment, and pollution control, and climate  
9 change.

10 And so as an organic grower, why organic is because  
11 we're keeping those on the farm. And we're spending the money  
12 and spending the time and the thought process to try and  
13 mitigate those so that your taxpayer dollars don't have to do  
14 that.

15 VICE CHAIR JEFFERY: Great. Thank you.

16 CHAIR POWELL-PALM: Appreciate you as always, Steve.  
17 Thank you.

18 MR. ELA: Good to see you all.

19 CHAIR POWELL-PALM: Next up we have Anne Ross,  
20 followed by Linley Dixon, and then Tony Michaels.

21 Anne, the floor is yours.

22 MS. ROSS: Good afternoon, everyone. My name is Anne  
23 Ross and I'm an organic investigator for the Cornucopia  
24 Institute, and also a member of the policy team. I'd like to  
25 thank the NOSB for their time here today.

1 I'll briefly address three issues. The first is the  
2 consistency in parcel identification. We support the baseline  
3 requirement of using GPS coordinates to obtain consistent  
4 location information, unless the certifier can articulate with  
5 specificity why an exception is appropriate.

6 As noted in some of the comments, a one size fits all  
7 approach may not be appropriate for some operations. For those  
8 operations, we urge the NOP to issue guidance specifically  
9 articulating the circumstances in which an exception to  
10 providing GPS coordinates would be acceptable. Clearly, the  
11 goal is to establish an accurate means of identification so  
12 inspectors can do their jobs. If it's not GPS, then a  
13 verifiable alternative for that operation should be required,  
14 and the guidance should clearly articulate the standards for  
15 exceptions.

16 Second, we support building on the SOE framework of  
17 additional residue testing. We have long supported testing of  
18 bulk imports. We know thousands of metric tons of fraudulent  
19 grain have been imported into the U.S. after being treated with  
20 prohibited fumigants. We called for consistent, unannounced  
21 testing at that time, and continue to do so. But to identify  
22 the non-compliant product before distribution, and when  
23 possible, before it travels through the supply chain.

24 At the very least, testing is a deterrent for bad  
25 actors, strengthening periodic and unannounced residue testing

1 will stop non-compliant product from entering the supply chain  
2 or help identify where it is.

3           Finally, we must join together in dispelling anti-  
4 organic propaganda. Consumers often ask about information they  
5 see from sources like social media. A look at social media  
6 content, for example, shows there is an increasing amount of  
7 misleading information about food labels generally, often  
8 hailing the virtues of some that carried no legal or generally  
9 agreed upon definition, and others that outright disparage  
10 organic.

11           Transparency in organic helps ensure there remains  
12 some baseline consensus about the facts. We must insure  
13 authentic organic is not redefined by misinformation campaigns,  
14 the disastrous impact and influence of factory farming, and the  
15 unchecked power of monopolies in our food system.

16           When a few mega companies consolidate and control the  
17 good system and messaging, consumer choice is nothing more than  
18 an illusion. A food system where several corporate giants  
19 dictate what we eat, what we grow, and what farmers get paid is  
20 without a doubt a threat to the organic movement, and to  
21 anything that does not serve their profit motive. These few  
22 should not define, dictate, or dilute what organic means.

23           Thank you for your time.

24           CHAIR POWELL-PALM: Thank you for your comments.

25           Questions for Anne?

1           I just want to say, Anne, thank you so much for three  
2 of your points there, but thank you also and I have only been  
3 on NOSB for a few years, but the tenor of Cornucopia is so  
4 helpful and so serious, and I just really appreciate the  
5 partnership you all are -- and the example you all are setting  
6 for how to spread the good message around organic. So thank  
7 you for the work and your team. I really appreciate it.

8           MS. ROSS: Thank you all.

9           CHAIR POWELL-PALM: Next up we have Linley Dixon,  
10 followed by Tony Michaels, and then Dustin Ploeger.

11           Linley, the floor is yours.

12           MS. DIXON: Hi. I'm Linley Dixon. I'm an organic  
13 vegetable farmer from southwest Colorado, and the co-director  
14 of the Real Organic Project.

15           Last spring, I got to go to Washington, D.C. with the  
16 Organic Farmers Association and my goal was to talk to our  
17 representatives about climate smart farming, and how organic,  
18 obviously, is climate smart because of our soil health  
19 practices, and our pasturing requirements, all of these are  
20 written into law. And the quick response of many of the  
21 Congressmembers, all of the ones that I met, it was almost on  
22 autopilot, it was organic can never be climate smart because  
23 organic farmers till.

24           I don't know how many of you have hear that as well  
25 in Washington. So I was completed taken aback, because this

1 conventional no-till farming is what they're talking about, and  
2 that uses herbicide termination and synthetic fertilizers, and  
3 now those are actually running off the land -- the synthetic  
4 fertilizers are running off the land even more, because they're  
5 service applied. There's all these cracks in the soil, and  
6 those fertilizers go straight down, you know, to the drainage  
7 tiles.

8           So we've never seen eutrophication in the waterways  
9 as bad as it's been right now. And so I think we need a new  
10 term. I think it's called real climate smart farming.

11           So this is the low input farming that organic farmers  
12 grow their own fertility for the next crop. They may or may  
13 not incorporate or till that organic matter in. Actually, to  
14 answer, I think it was Mindee asked Steve, what is the best  
15 definition of organic farming? It's the incorporation of  
16 organic matter into the soil. That's what gets rid of the need  
17 for anything synthetic to even be sprayed in the first place.

18           I understand that organic is always going to be up  
19 against these kinds of misinformation campaigns, generated by  
20 the chemical industry for the most part. The CEO of Syngenta  
21 recently called for an end to organic farming because we have  
22 50 percent lower yields, he said. And because of that, people  
23 are, "Starving in Africa," because we're eating more organic  
24 food.

25           We all know we have global overproduction. So it's a

1 lack of distribution. So I understand that we're up against a  
2 huge chemical lobby that rewrites the story of organic. And  
3 the natural response to that is to stick together, right, and  
4 be stronger. Be bigger organic. Use words like a bigger tent  
5 and inclusivity, and commonality, so we can fight the chemical  
6 lobby.

7           And I feel this at the NOSB right now. But I want to  
8 caution that we should be aware of who is encouraging us to  
9 have a big tent, because that same subsidized chemical soybean  
10 production that's getting, you know, all of the climate smart  
11 funding, that's what's being used for fertility on the organic  
12 hydroponic industry. They use it in the form of hydrolyzed  
13 soybeans, which are allowed to be conventionally farmed.

14           So the hydroponic industry benefits from subsidized  
15 conventional soybeans. So everyone in this big tent has very  
16 different interests. The organic hydroponic industry is now so  
17 powerful that they set the price point and control the shelf  
18 space for the most profitable crops there are. I have one take  
19 home point from this -- am I allowed to say it, my take home  
20 point?

21           CHAIR POWELL-PALM: Sure. Go ahead.

22           MS. DIXON: In the EU, where there's higher integrity  
23 under the organic program, they do not certify CAPOs, they do  
24 not certify hydroponic as organic. And organic is growing ten  
25 times faster, ten percent of the land there is organic.

1           So it's just a really important point that actually  
2 organic growth is faster where there's integrity, and people  
3 trust the label, and they don't go running around looking for  
4 pastured, or grass fed, or comes from family farms, or all  
5 these other labels.

6           Higher integrity, faster growth. Thank you.

7           CHAIR POWELL-PALM: Any questions for Linley? All  
8 right, Linley, we appreciate your comments.

9           Mindee has a question for you.

10          VICE CHAIR JEFFERY: Thanks, Linley. No, I was  
11 asking Steve about messaging because I think about it all the  
12 time. In the grand scheme of life, how best can we position  
13 organic with the positives.

14          And so for me, it's a lot about politics. And I'm  
15 wondering if y'all ever position organic in the politics of  
16 democracy, and how our regulations sit, and the power of that  
17 for individuals and individual farmers in your messaging.

18          MS. DIXON: That's a great question. We just had  
19 Zaffer Teach out at our conference at Churchtown Dairy.  
20 Everybody should watch it. I'll send the link around. Zaffer  
21 talks about how we're losing our democracy because of the  
22 consolidation everywhere, right? And that's happening -- the  
23 same thing is happening in the organic industry. And we are  
24 losing our power and our choices.

25          CHAIR POWELL-PALM: Allison, please go ahead.

1           BD. MEM. JOHNSON: Yeah. Thanks for your comments,  
2 Linley. I want to go back to the beginning and the no till  
3 issue because I really strongly agree with you that it's a  
4 challenge.

5           The solution that I've been struggling with is if we  
6 do more research to show that organic farms are successfully  
7 sequestering carbon at equivalent or higher rights than no  
8 till, herbicide dependent farms, it -- my understanding is it's  
9 challenging for smaller-scale producers to participate in that  
10 type of research and that having research requirements or  
11 frameworks may actually be excluding some of the farmers that  
12 we think are using among the best practices.

13           So I'm curious if that's something that you've  
14 thought about and how data and research can help us make the  
15 case for organic, or whether we need a different framework  
16 entirely, and to kind of like reject that approach.

17           MS. DIXON: Yeah. A challenge -- I think it's been  
18 shown that the no till chemical farming actually might  
19 sequester more in the upper layers, just because that's where  
20 the organic matter hasn't even gotten into the soil. So at  
21 deeper layers, I think -- so I guess I'm frustrated that we're  
22 having to even prove this. That if you just look at the  
23 synthetic fertilizer production, that that carbon footprint is  
24 so massive, and the fact that we're not using those synthetic  
25 fertilizers or any of those herbicides, just the production of



1 them alone, should be able to put this to rest.

2           The farmers that use those inputs are -- can never be  
3 climate smart, simply because they use those inputs. So we  
4 need to rewrite the story here. I think they're telling us  
5 what climate smart is, and we're defending ourselves. I think  
6 we need to go after the inputs.

7           CHAIR POWELL-PALM: Amy, please go ahead.

8           BD. MEM. BRUCH: Yeah. Quick question, Nate.  
9 Linley, thanks for your time today.

10           I just want to know, have you run across different  
11 definitions for no till? I heard that sometimes no till is  
12 being classified as four inches or less of tillage. So I just  
13 wondered, have you been hearing that?

14           MS. DIXON: Yeah. I think some farmers just  
15 incorporate a little bit of compost into the upper couple  
16 inches, and you know, might call that no till as well. But  
17 yeah, I think it's okay to have different definitions for these  
18 terms. In general, no till -- because very few farmers have  
19 figured out how to do the roller crimper in organic systems.  
20 In general, no till is chemical farmed.

21           So when most people say no till, without saying  
22 conventional no till, for the vast majority, unless it's a  
23 large farm adding lots of compost, there's tillage involved if  
24 it's organic, and no till is chemical.

25           BD. MEM. BRUCH: Okay. Thank you, Linley.

1 Appreciate your time.

2 CHAIR POWELL-PALM: All right. Next up, we have Tony  
3 Michaels, followed by Dustin Ploeger, and the BJ McNeil.

4 MR. MICHAELS: Thank you very much. Thank you very  
5 much to the Board and staff for all the great work you do on  
6 behalf of this community.

7 I'm Tony Michaels. We're transitioning a bunch of  
8 acres in Western Nebraska right now. Our team has been farming  
9 organic in a variety of locations in the Midwest for the last  
10 20 years. And we primarily do row crops of grains and alfalfa  
11 as the centerpiece of the farming that we do.

12 What I'd like to talk a little bit about is crop  
13 insurance, and previous speakers have talked about the problems  
14 with crop insurance, the conventional crop insurance market  
15 being applied to organic. I'd like to talk a little bit about  
16 a solution to this.

17 I had a weird little sidelight in insurance in a  
18 previous life, and it was, I think, relevant to this case. The  
19 problem with insurance is that the history of insurance is that  
20 you use your past experience, your actuarial history, to guide  
21 the pricing of your future risk. And that's a good approach  
22 when you've got past experience.

23 The problem is when you do something new, by  
24 definition, you don't have past experience. And whether it's  
25 you doing something new, or the industry adding something new

1 into the options set for what we do, we instantly move out of  
2 the typical paradigm. And so what the insurance industry does  
3 is it closes different things in, like T yields and other stuff  
4 to solve that.

5 This has happened many other times in the insurance  
6 industry where new practices come on board, and the industry  
7 has an approach -- parametric modeling kind of approach, that  
8 really tries to use other tools to forecast the risk through to  
9 the period where you then have enough actuarial history to use  
10 the more traditional approach.

11 And I think we just need to do this. Somebody's got  
12 to bite the bullet and put together a parametric modeling  
13 approaches, in partnership with the insurance industry, so they  
14 can get the same comfort with this as -- you know, they'll  
15 insure the first time a new rocket blasts off to launch a  
16 satellite into space. It's insured, and there's no experience  
17 there.

18 We're a lot more knowledgeable and less risk than  
19 that kind of behavior. So we just have to take this industry  
20 and actually embrace it for the other tools that it can bring  
21 to bear.

22 Part of our thing is that insurance is the primary  
23 subsidy that's brough into agriculture. And so it's heavily  
24 regulated. It's heavily government influenced. And that is  
25 the other piece that ensures that the more market-type insurers

1 that would do these approaches worry about when they engage  
2 with us.

3 I think if we do this correctly, we can come up with  
4 products. Those products can be new practices. They can be  
5 multi-annual. They can be transition insurance products. They  
6 can be built specifically so the banks can engage with them,  
7 and it can be part of how banks comfortably loan in both annual  
8 and multi-annual operating lines.

9 We could even take this kind of insurance model and  
10 apply it to the forgeries that are coming over in these ships,  
11 and just require that those folks have an insurance product  
12 that certifies -- that insures that what's being on that ship  
13 is real. And then that adds the price for all the fraudulent  
14 activity to the people that are doing this importing, unless  
15 they can prove it and simplify this process.

16 So anyway, I talked too long.

17 CHAIR POWELL-PALM: If you've got more, you keep  
18 going. This is the best thing I have heard in years. Oh my  
19 gosh. That was great. Thank you.

20 MR. MICHAELS: No. This is --

21 CHAIR POWELL-PALM: Could you repeat just one second,  
22 repeat that rocket ship piece one more time.

23 MR. MICHAELS: So the first time a new rocket  
24 launches a new satellite into space, it is actually insured,  
25 even though it's never ever been used before. It's not even

1 ever tested for real, right? And but you can't do a launch  
2 without putting something on it that has some value.

3 And so I had this weird little side lighting global  
4 catastrophe insurance in Bermuda 25, 30 years ago, so I was in  
5 the nascent part of this industry. But this industry exists.  
6 They need a big enough market. And so our problem is that we  
7 segment ourselves up so that we're so niche that it's just, you  
8 know, Tony showing up with a few acres, trying to ask for a  
9 product that's going to take some work. But it's not that  
10 expensive if it's an industry that's asking for it.

11 We just have an industry that has never gone into  
12 this heavily government subsidizing. It's like -- you know,  
13 flood insurance is also heavily federally subsidized. And so  
14 it's just a pass-through for the insurers. They don't do any  
15 modeling on it.

16 I think we could engage this industry -- I think  
17 they're looking -- they're always looking for new markets. I  
18 think the knowledge that they would apply would also then mesh  
19 with the practices we want to encourage. So we would be  
20 letting people make choices among transition practices that  
21 they want to try, or have best practices because those are the  
22 ones the insurers will write you the best policy for because  
23 it's a good thing.

24 And by the way, we ought to have a good insurance  
25 policy for alfalfa after it's been established. You know, so

1 just to be practical. So anyway, I can talk forever. I'm not  
2 a person of few words. So you've got me going.

3 CHAIR POWELL-PALM: Thank you so much for that. As  
4 we talked about how do you message organic, I'm just imagining  
5 that YouTube video saying it's easier to get a rocket that's  
6 never flown before insured than corn that we've grown for the  
7 last 10,000 years. So thank you for that very much.

8 Questions from the Board? All right. Well, you  
9 knocked it out of the park. We really appreciate you coming in  
10 to taking your time. I realize it's harvest. You're busy. So  
11 thanks so much for taking the time to call in today.

12 MR. MICHAELS: Sounds good. Thank you again for  
13 everything you do.

14 CHAIR POWELL-PALM: Appreciate it.

15 Next up, we have Dustin Ploeger, followed by BJ  
16 McNeil, and then Zach Gazzaniga, if Zach is on the call. I'm  
17 not sure if we've got him yet.

18 But let's go to Dustin.

19 MR. PLOEGER: Hi, can you hear me okay?

20 CHAIR POWELL-PALM: We can. Please go ahead.

21 MR. PLOEGER: Okay. Well, as you said, I'm Dustin  
22 Ploeger. I'm an organic grain merchant with the Scoular  
23 Company. Currently coming up on four years of trading the  
24 organic market. Scoular's been around much longer. We've been  
25 in the organic market for about 25 years. So I want to thank

1 the National Organic Standards Board for the work that they do,  
2 and the opportunity you've given to us and others for public  
3 comment. Appreciate everything.

4 At Scoular, we represent a blended view of the  
5 market, and being both buyers and sellers of the trade. So we  
6 have obviously customers who want to buy the lowest cost feed  
7 ingredient and customers who want to sell the highest cost feed  
8 ingredient. Organic corn, soybean, soybean meal, feed, wheat.  
9 And it's a balancing act, and our approach to that risk  
10 management takes into consideration those two forces from  
11 customers we look to service to the best of our ability.

12 And there's no true hedging mechanism that we found  
13 is an effective tool in this effort, and at the end of the day,  
14 we're flat-priced traders in a highly volatile market.

15 And the organic grain market, in particular, is  
16 unfortunately ripe with several high-profile bankruptcies, and  
17 that's, to me, a testament of the difficulty of the trade  
18 environment we operate in.

19 And circling back to Scoular, I think it's my belief  
20 that a large part of our success in this industry is because  
21 we've centered and focused by serving the domestic market, U.S.  
22 based growers and end users. But that said, we're not immune  
23 from the shockwaves felt by the global trade for organic  
24 grains.

25 And the U.S., as we've all heard here, relies heavily

1 on those imports, and in particular organic soybean, soybean  
2 meal, and participants in this type of trade absorb tremendous  
3 risk, and while doing so, they're directly impacted by the  
4 decisions this Board makes and other governing bodies.

5 Now, we at Scoular, having a different focus, we  
6 champion this enforcement, the testing requirements, the  
7 geotracking, supply chain audits. We want to see more of that  
8 and level the playing field. And that these products coming  
9 into the United States are handled under the same governances  
10 required by U.S. standards.

11 That said, we would ask the committee for  
12 recommendations on reporting any instances of non-compliance  
13 for imported feed ingredients. Given our vantage point working  
14 for both buyers and sellers, we see the negative and positive  
15 effects of price movement. But better communication on issues  
16 of non-compliance, in essence, immediate reporting of fraud,  
17 for example, would allow markets more time to react and tamp  
18 down price shockwaves that are highly disruptive to healthy  
19 markets.

20 Thank you.

21 CHAIR POWELL-PALM: Thank you for your comments very  
22 much.

23 Nate has a question for you.

24 BD. MEM. LEWIS: Yeah. Thanks for your comments. A  
25 couple of questions related to testing and the document that



1 CACS was working on.

2 MR. PLOEGER: Yes.

3 BD. MEM. LEWIS: One is related to organic solvent --  
4 organic meaning carbon-base, not certified organic, but  
5 methanol and various other organic solvents as a testing tool  
6 for deterring fraud in the seed meal world. I'm curious what  
7 your thoughts are on that. And then secondly, the organic  
8 standards already require certifiers to make available to the  
9 public all of their period residue testing. And I'm curious if  
10 you have thoughts for how that could potentially be compiled  
11 and made a productive resource for the trade as you suggest in  
12 terms of targeting certain regions.

13 So first, granularly soybean meal or seed meals, and  
14 then secondly, the data question.

15 MR. PLOEGER: Yeah. There are more ways to slice  
16 that, you know, trace hexane obviously, but trace other  
17 solvents so methane, ethanol, those are all things that I think  
18 should be done at ports of entry.

19 If there's a great way to go about it, I think it  
20 would be enlisting custom's border patrol to rapid run those  
21 tests at ports of entry. And then in particular to my ask to  
22 the committee is if something is found, how does that get  
23 communicated back into the market?

24 As we try to trade the market, a lot of what we're  
25 forced with is the rumor mill of, you know, so-and-so had

1 containers trip at the port. Well, did it, did it not? And  
2 it's those type of price shockwaves that impact the market, and  
3 negatively impact the end users, the demand side of the market.  
4 If prices run, obviously, the same scenario would happen to  
5 growers if those imports just continue to come in.

6 So yes, I think right now, standard would be asking  
7 for those types of tests run third part at ports of origin. I  
8 think they should also be done at the ports of entry.

9 CHAIR POWELL-PALM: Amy has a question for you. Yes.

10 BD. MEM. BRUCH: Yeah. Nate, thanks. Appreciate it.

11 Yeah, Dustin, thanks for your time today and lending  
12 your voice. This is an important conversation. Your  
13 perspective is really interesting and we're thankful to have  
14 it, because we don't hear from a lot of people that you're  
15 representing. So this is really critical, especially now on  
16 these instances of imports and just where they stand.

17 I was just wondering have you seen any changes since  
18 you trade -- I appreciate, one, the focus on domestic, but I  
19 wanted to see -- have you seen any interaction since you do,  
20 and you're aware of trading on the global market, just  
21 interactions with international brokers? Are they reaching  
22 out, or is there more interaction there? Do you see more  
23 conversations happening?

24 MR. PLOEGER: Yeah. A lot of it is not necessarily  
25 solicited, but our name's out there, among others, and we get

1 international inquiries all the time as to our interest in  
2 purchasing African, Turkish-origin, Indian-origin, Chinese-  
3 origin. We've always treated with a little bit of reluctance,  
4 primarily because of the trust in the supply chain.

5 That's obviously reduced our ability to gain market  
6 share because the U.S. does import that. We've taken an active  
7 pass on a lot of business. But we have to feel good about  
8 what's coming in.

9 And again, to the communication piece on reporting, I  
10 think the net effect obviously is to stabilize the market,  
11 avoid price bubbles that may burst, but also let others know  
12 who to stay away from, who to do business with, who not to do  
13 business, who's doing their due diligence to vet out the supply  
14 chain on their own. And again, looking for recommendations as  
15 to how, if customs border patrol is enlisted, how they can  
16 communicate to an effective body so that us, as buyers,  
17 potential buyers could be aware who to avoid and yeah, buyer  
18 beware essentially.

19 BD. MEM. BRUCH: Uh-huh. Good points. Thank you.  
20 Appreciate it.

21 CHAIR POWELL-PALM: Kim as a question for you.

22 BD. MEM. HUSEMAN: Thanks, Nate. Thanks. I really  
23 appreciate your points, Dustin, and appreciate your voice as,  
24 you know, a leading ag business in both the conventional and in  
25 the organic space to be present today.

1           As you know, the lack of transparency in the market  
2 does tend to create that hearsay without the factual components  
3 behind it, and having that space of the facts behind it would  
4 be extremely helpful. Hopefully, in a transparency aspect, I'm  
5 not getting into proprietary information, but do you guys  
6 currently do both international and domestic trading at all?

7           MR. PLOEGER: Yeah. As a company, we do. Obviously,  
8 Scoular is a much larger presence than just our organic  
9 business. We have --

10          BD. MEM. HUSEMAN: I'm sorry, in the organic space.

11          MR. PLOEGER: Yeah. In the organic space, we have,  
12 but it's been very, very minimal, primarily for the same reason  
13 of not fully trusting the supply chain. So I want to say --  
14 this has probably -- like I said, I've been with the company  
15 four years ago. Probably 10 to 15 years ago, Scoular had a  
16 much larger footprint in that aspect, and I want to say  
17 timeline wise, it was before I arrived say five to six years  
18 ago. That footprint had shrunk back considerably because of  
19 what we were seeing, because of what we were experiencing.

20          BD. MEM. HUSEMAN: Yeah. Got you. No, I appreciate  
21 that. And my question to you, then, would be we talk about --  
22 and this is more of a -- from a business standpoint, and we  
23 talk about mitigating risk. If Scoular were to go out and --  
24 or list the name of the company in this global market, buy  
25 product from origin, have product tested, tested product comes

1 back clean, product gets to the states, and product doesn't  
2 test clean, who then becomes financially liable for that  
3 product?

4 MR. PLOEGER: Yeah. That's a good question. Those  
5 type of trades are usually negotiated at the onset of whether  
6 you're buying FOB, CIF, DDP, all being trade terms to where  
7 that risk transfer happens, where the true ownership transfer  
8 would happen.

9 BD. MEM. HUSEMAN: Okay.

10 MR. PLOEGER: So DDP, for instance, would be delivery  
11 duties paid, and that is by the seller. So in that instance,  
12 that has actually grown in popularity from those that do  
13 heavily trade that market because the risk is then transferred  
14 back to the port of origin, or the seller of origin.

15 BD. MEM. HUSEMAN: Right. And that transparency can  
16 -- again, to me, it goes back to transparency, right?

17 MR. PLOEGER: Right.

18 BD. MEM. HUSEMAN: It can get lost and then these are  
19 not -- you know, we talk either look at the top three leading  
20 by dollars imported products, I think one of the written  
21 comments had data from 2019. You know, it's -- it was coffee,  
22 soybeans, and bananas. But at the end of the day, that's a lot  
23 -- that's a large figure, and when you start talking risk and  
24 risk assessment, and you know, where then does that financial  
25 burden lie. And when you start talking international partners,

1 you hope that you have ones that are of high integrity for  
2 sure, right?

3 MR. PLOEGER: Absolutely. Absolutely. And again, to  
4 zero back to the ask of the committee is to think of ways  
5 creatively and collectively to increase the communication  
6 around any bad actors that might be out there so that the,  
7 again, price stabilization, obviously we want good, healthy  
8 prices, but we don't need -- I think I was hearing from a  
9 grower earlier, you know, just the extreme volatility in  
10 soybean prices. Ultimately, it's not healthy for one, the  
11 grower, and the end user. And so I think that can be minimized  
12 with just better understanding of the whole supply chain and  
13 the communication around it.

14 BD. MEM. HUSEMAN: Right. Facts, not assumptions.  
15 Awesome. Hey, thanks so much for your time, Dustin.

16 MR. PLOEGER: Thank you.

17 CHAIR POWELL-PALM: We really appreciate your  
18 comments today, Dustin. Thank you so much for joining us.

19 Next up we have BJ McNeil, followed by Kristopher  
20 Klokkenga, and then Peter Gunther.

21 MR. MCNEIL: Yes, can you hear me?

22 CHAIR POWELL-PALM: Yes, we can. Go ahead.

23 MR. MCNEIL: Can you hear me? Okay. I may have bad  
24 cell reception. I'm in my combine right now.

25 I want to basically just kind of expand what's been

1 talked about. It was a great intro. I want to discuss, or  
2 thank him for doing that and thank you all for listening.

3 But the impact of the import on organic is --  
4 especially for our farm, has been quite severe, especially over  
5 the last 12 months. I have sunflowers from 2022 that there's  
6 literally no market for because the imported sunflower market  
7 has just crushed demand for local. Of course, we all know the  
8 story on soybeans and everything else.

9 But this also caused us to move a lot of acres out of  
10 organic because there's just not reliable markets. We're just  
11 not finding them. We've had even trouble collecting on some  
12 delivered goods this year because we had barely above current  
13 market contracts, and people, you know, were either trying to  
14 get out of them, couldn't afford to pay it at the time because  
15 they were having competition from somebody else that was buying  
16 beans cheaper, then their product was competitive, and so on  
17 down the road like it goes.

18 But anyway, I just -- I really want to reiterate what  
19 Dustin said on that. The -- it seems to me that, and even  
20 listening to the majority of people that -- I've been listening  
21 for about an hour here, and the majority of people that have  
22 spoken, that there's quite an emphasis on worrying about  
23 whether an acre is certified organic or not, but we don't put  
24 anywhere near enough emphasis on guaranteeing the products in  
25 the food chain are organic.

1           And I think that's something that needs to be stepped  
2 back by the Board, and maybe organic as a whole and looked at.  
3 You know? What's more important? To verify every acre in the  
4 U.S. is organic or verify the U.S. organic food chain is truly  
5 organic and chemical free. And that's -- I think that takes a  
6 different mindset, and different priorities than where a lot of  
7 the mindset priorities are currently.

8           The second thing I guess I wanted to discuss was the  
9 approval of some products to be used in organic. I think we  
10 don't use enough common sense sometimes, for lack of better  
11 terms. A good example is this year, we were low on molybdenum  
12 on soybean fields so wanted to but moly out. The one product  
13 we found that actually worked, and there was actually data that  
14 showed it got into the plant, we couldn't use because one of  
15 the products in it was selenium, and we couldn't prove that our  
16 soil needed selenium.

17           Now, mind you, we were putting out three ounces of  
18 this product per acre. The amount of selenium going out  
19 would've been parts per million. I mean, minute. But yet, we  
20 couldn't put that out because we couldn't prove that we needed  
21 selenium.

22           CHAIR POWELL-PALM: If you have a quick finish up  
23 there, Dustin (sic).

24           MR. MCNEIL: Well, because -- but yet we allow five  
25 tons of poultry litter to go out on a field that's putting out,



1 you know, according to (indiscernible), there's many pounds of  
2 selenium that are being applied when you put out five tons of  
3 poultry litter, but yet that's fine. But if you're trying to  
4 not put fertilizer out, and do it biologically, and foliar feed  
5 your plant, and not put all of those nutrients out there, then  
6 you're penalized. That's all.

7 CHAIR POWELL-PALM: Yeah. Thank you. We really  
8 appreciate your comments. Questions for BJ from the Board?

9 All right. BJ, we hear you loud and clear, and when  
10 folks said that this was a bad time of year to have a meeting,  
11 it sounds like you're making it work, this platform. So we  
12 really appreciate you calling in from the combine and making  
13 your voice heard. Thank you very much.

14 MR. MCNEIL: Thank you.

15 CHAIR POWELL-PALM: All right. Next up we have  
16 Kristopher Klokkenga, followed by Peter Gunther, and then Aaron  
17 Zimmerman.

18 Kristopher, if you're there, the floor is yours.

19 MR. KLOKKENGA: Hi. My name is Kristopher Klokkenga.  
20 I'm a fourth-generation farmer from Central Illinois. And I  
21 started converting my farm over to organic in 2015.

22 I wanted to speak with you today about insurance and  
23 some things that maybe I think you could improve on. The first  
24 one is your T yields. This is the first year that I've ever  
25 had an insurance claim on a field, and just to give you an

1 idea, my conventional T yields are in the 70s for soybean  
2 yield. My T yield for -- in general off a farm in Mason  
3 County, Illinois is at like 25. My T yield is 36 because I've  
4 had one year of 50-bushel soybeans on that.

5 And so I just wanted to tell you that I think that  
6 the T yields discourage farmers from getting into organic  
7 because they're not able to -- I mean, the backstop here is the  
8 yield that -- in our insurance that we can use. I understand  
9 that 2017, the conventional T yields were no longer allowed,  
10 and therefore, they were like dropped in half.

11 I think maybe a little -- this goes back to the  
12 gentleman who talked earlier, I think his name was Tony, just  
13 about the fact that the rocket -- you know, insuring the  
14 rocket. And so it's like, okay. If I know that I can produce  
15 50-bushel beans, is there not a way that we could raise that to  
16 make it more attractive for me to grow that.

17 The other thing that I wanted to speak with you about  
18 is whole farm insurance. I've been -- I've started a new  
19 organic entity. I started transitioning '15 -- I started an  
20 organic entity in '19, and what happened was I need five years  
21 of taxes in order to be able to justify whole farm insurance.  
22 And so I don't -- as of today, like in 2023, I don't have five  
23 years. I won't have five years of organic records until next  
24 year, at which time I'd be able to apply for it in, like, 2025.

25 And the problem with that is that I came in under a

1 previous entity, which was my family's. I converted my family  
2 farm over to organic. So therefore, since I had conventional  
3 yields, if I pulled those in, then it's saying, okay, let's say  
4 you sold a million dollars' worth of grain under a conventional  
5 entity, but then you move over and you're selling now organic,  
6 and you're selling \$2 million, how do you bridge that gap?

7           And I would just like to -- it's just a little bit  
8 hard with the history. I'm a multi-generational farm here,  
9 trying to exist in central Illinois, and want to try to be able  
10 to compete, and continue to grow things the way I want to. I  
11 enjoy growing organic. It's hard work, but we do it. And I  
12 would just like to make sure that there are some things in  
13 place that probably other people get to benefit from, but since  
14 I'm an organic farmer in the stage that I am, I'm just not  
15 there yet.

16           CHAIR POWELL-PALM: We really appreciate thoughts on  
17 this subject. This is definitely top of mind for our CACS  
18 subcommittee, and we're trying to get as much information as we  
19 can to make crop insurance work for organic farmers. So thank  
20 you for bringing your story and making your voice heard,  
21 especially during the busy harvest time. Really appreciate it.

22           MR. KLOKKENGA: Thank you.

23           CHAIR POWELL-PALM: Any questions for Kris?

24           All right. You're off the hook. Thank you so much.  
25 Appreciate it.

1           Next up we have Peter Gunther, followed by Aaron  
2 Zimmerman, and then Matthew Keegan.

3           MR. GUNTHER: Yes. Can you guys hear me?

4           CHAIR POWELL-PALM: We can. Please go ahead.

5           MR. GUNTHER: All right. I'm Peter Gunther. I'm a  
6 farmer here in West Texas. I've been growing organically for  
7 18 years. I do a lot of different crops over here. But the  
8 main thing I wanted to visit with you guys about was the  
9 organic peanuts. We do have a lot of organic peanuts being  
10 imported. And the concern I have with that is I don't think  
11 that -- well, from what I've heard, and I need to do a little  
12 bit more research on this to prove it 100 percent, but that  
13 they don't test the crops that are coming in from overseas, and  
14 if they do, it's a very small amount.

15           I know that there has been some crops that come in  
16 from overseas that have been tested by independent companies  
17 and has come back, you know, bad. And so I'm afraid of that  
18 hurting the integrity of the organic market here. And not only  
19 that, but they can grow them so much cheaper, and we just can't  
20 -- we're just not on a level playing field. You know? It  
21 costs us farmers so much to grow these crops organically in our  
22 country, and to do it all, you know, 100 percent, and it's just  
23 not sustainable for us.

24           You know, we spend tens of millions of dollars, I do,  
25 personally, buying new land, raw land, to grow these crops

1 because of disease and weed pressure. And you know, after a  
2 while, the crops, they just don't produce anymore, so -- or  
3 they don't produce as much. And so therefore, the profit  
4 margin is, you know, way lower.

5 And so our labor, everything costs so much, and we're  
6 just not on a level playing field with these guys that are  
7 importing peanuts from other countries into our country. And I  
8 don't know what needs to be done about that, or who you know,  
9 to talk to about that, but that was the major concern that I  
10 have as far as on the peanut side. And so that's what I wanted  
11 to address you guys with today.

12 CHAIR POWELL-PALM: Thank you very much for calling  
13 in, and we hear your concern. Any questions from the Board?  
14 Amy, please go ahead.

15 BD. MEM. BRUCH: Yeah, thanks, Nate. Thanks, Peter,  
16 for lending your voice to this process. Good to have Texas  
17 representation, farmer representation on this call.

18 We've heard some farmers from the Midwest talk about  
19 how grain imports have impacted them, and some have taken land  
20 out of transition. Do you know from the peanut perspective in  
21 your area, you yourself, how have imports impacted you?

22 MR. GUNTHER: Yeah. Well, we've had to take some of  
23 ours out of organic also just because of -- it's just not cost  
24 effective. You know, the price that these guys can get these  
25 peanuts shipped in is quite a bit cheaper than what we can grow

1 them for here.

2           The only way we can have a fighting chance is like I  
3 said, with the new ground that produces more and takes less  
4 input cost, you know, as far as labor. And that's the only  
5 thing, but that's just not sustainable. Like we're going to  
6 run out of new ground to develop because eventually it just --  
7 you're going to run out.

8           And so I'm afraid that this organic peanut market is  
9 going to take a huge hit here in America because we just don't  
10 have -- well, I mean, we just don't have the resources to stay  
11 compared to what's coming in overseas.

12           And also, what I'd like to add too is in 2011, we had  
13 a major drought here, and we -- there was a major shortage of  
14 peanuts. And so I know there was a lot of Chinese peanuts  
15 imported to fill that gap. And ever since then, it just seems  
16 like they've -- that's kind of opened the floodgates of  
17 everybody just kind of going overseas. So there's not really a  
18 big incentive to, you know, give us farmers what our crop is  
19 worth when they can go overseas and get it for, you know, 30 to  
20 40 percent cheaper than we can grow it for here.

21           CHAIR POWELL-PALM: Logan has a question for you.

22           BD. MEM. PETREY: Yeah. Hey, thank you, Peter.  
23 Question, what do you rotate with? So you have peanuts. Do  
24 you have anything else in rotation as a cash crop?

25           MR. GUNTHER: Yeah. We do wheat and corn. Wheat and

1 corn is kind of the better rotation that we have for peanuts,  
2 and there's just no market for organic corn here either. I  
3 mean, there's a few organic dairies that we can sell to, but  
4 that's very few.

5 So that's why organic peanuts is kind of the main  
6 thing that actually makes any kind of money worth growing any  
7 crop around here. It's just not -- corn around here just  
8 doesn't pay enough to where it's worth it. You know? That's  
9 our issues here too.

10 BD. MEM. PETREY: Yeah. And your product is in the  
11 ground, and so rotation is extremely important for you, and a  
12 lot of covers actually are in the peanut family. And so I can  
13 see where that is difficult, and so you do probably rely --  
14 need to rely on that corn, and wheat, and other things to  
15 protect your cash crops. So I can see where that's  
16 complicated.

17 Okay. Thank you, Peter. Appreciate that.

18 MR. GUNTHER: Thank you.

19 CHAIR POWELL-PALM: The -- Kim, please go ahead.

20 BD. MEM. HUSEMAN: I'll keep it quick, Nate. Thank  
21 you.

22 And thank you so much for your comment, Peter, and  
23 the lens in which you present how your farm is competing in the  
24 market space, and the challenges that, you know, become very  
25 margin-based.

1           You know, and I think that there's some examples  
2 historically of how that can be challenged, and how U.S.  
3 farmers have been able to try to level that playing field, but  
4 it's very exhausting, and it's a very complicated process. And  
5 you know, I appreciate you bringing this to the Board too,  
6 because you've given me more insight as well from just that  
7 margin aspect, and the different inputs, labor, cost of land,  
8 and the different struggles that you're having that might not  
9 be the same as another place that gives some market  
10 competitiveness.

11           So I wish you well in all of your crops, and again, I  
12 just really appreciate you coming on today. So it was more of  
13 a comment than a questions, but wanted to make that known.

14           CHAIR POWELL-PALM: I would echo that. We don't get  
15 to hear from Texas enough. So thank you so much for your time  
16 --

17           BD. MEM. HUSEMAN: That's right.

18           CHAIR POWELL-PALM: -- and joining us, and please  
19 join us again, all the farmers. We want to hear from you every  
20 meeting. Thank you for bringing what's going on out in the  
21 world to our attention. Appreciate you.

22           MR. GUNTHER: Thank you, guys.

23           CHAIR POWELL-PALM: Next up we have Aaron Zimmerman,  
24 followed by Matthew Keegan, and then Jack Fehr.

25           MR. ZIMMERMAN: Hi everybody. Thanks for taking my



1 Zoom here.

2 Real quick, I just have kind of two topics, one very  
3 brief -- you know, the crop insured side of things. And  
4 forgive me if I'm being redundant or echoing what other people  
5 have already said, because I just logged in now, but I wanted  
6 to touch on things that are important to me as a cash grain  
7 producer here in the Midwest.

8 I guess a little bit about me. Northeast Nebraska.  
9 We're approximately 2,500 acres of -- it's all certified  
10 organic. We grow corn, soybeans, wheat, barley, buckwheat,  
11 yellow peas, alfalfa, and then some covers also. So we try to  
12 stay pretty diverse.

13 So the two topics I wanted to talk about are crop  
14 insurance and then I guess the other side of it would be  
15 imports and the subsequent fraud.

16 Crop insurance real quick, you know, I think a lot of  
17 people have touched on it, but one of the things that's  
18 probably bothered me the most was you know, when you start  
19 transitioning, obviously, you use the county T yield at that  
20 point. And then -- I mean, and you're doing it organically,  
21 and then when you actually get to being certified organic, you  
22 start back over with that county T yield, but nothing has  
23 changed in your practice technically.

24 So that's kind of -- that's something that definitely  
25 needs addressed. And I suppose that's the main thing I wanted

1 to talk about with crop insurance. Probably the biggest thing  
2 and probably the biggest challenge for, aside from growing the  
3 crops, is just the imports that are from -- what I keep hearing  
4 over and over again is they're not necessarily organic, and  
5 they are competing with us United States producers who are  
6 organic, and it makes it very hard to compete on a world  
7 market, and even the national market because they can do it for  
8 a lot cheaper than us, and they're flooding our markets, and  
9 it's definitely squeezing our margins.

10           You know, I've heard talk about this standard  
11 location information concept. I am in favor of that, and I  
12 urge you if you vote yes for that, and then I also like the  
13 idea of testing on all imported grains. Everything that comes  
14 in has to be tested. And I don't know if that 100 percent cure  
15 all because I'm sure there's a lot of things that can happen  
16 that don't necessarily show up in the grain, but it's just --  
17 we just need to kind of keep putting little road blocks to keep  
18 these bad players out, and hopefully we can start seeing a more  
19 equitable market that works for our -- the United States  
20 producers.

21           So that is basically all I wanted to say. I can't  
22 hear you, Nate.

23           CHAIR POWELL-PALM: All right. We really appreciate  
24 it. Are you in harvest right now?

25           MR. ZIMMERMAN: Yeah. I had to -- I kind of blew in

1 here, and I wanted to sit down, and get in front of a Zoom  
2 camera for you, but yeah, out the door I go here real quick and  
3 --

4 CHAIR POWELL-PALM: We really appreciate it. Like  
5 can't express enough. Thank you for making the time to bring  
6 this to our attention.

7 Amy's got a question for you.

8 BD. MEM. BRUCH: Yeah. Hi, Aaron. Thanks for  
9 joining us today. I really appreciate your comments, and  
10 appreciate the support on some of the initiatives that we're  
11 working on with oversight to deter fraud. I want to ask you on  
12 the crop insurance piece. So you mentioned all sorts of crops  
13 that you grow, which is amazing that you're that diverse. How  
14 many of those crops are insurable actually through our federal  
15 program?

16 MR. ZIMMERMAN: You know what, I probably should have  
17 gone into it in a little more depth. I apologize because we --  
18 we could probably spend quite a bit of time on that. Honestly  
19 two: corn and soybeans. And even that isn't very good. You  
20 know, I could insure the wheat, but it's just -- I guess the  
21 juice isn't worth the squeeze, I guess, to put it bluntly.

22 So this year and last year, I have not taken  
23 insurance on the wheat side either. But, you know, the  
24 buckwheat, the barley, you know, all these other things, and  
25 alfalfa, which is a forage, you know, you're pretty much flying

1 naked and it's kind of uncomfortable.

2 So it would be nice if we could address that as well.  
3 Thanks for bringing that up because that is important.

4 BD. MEM. BRUCH: Thank you. I appreciate that,  
5 Aaron.

6 CHAIR POWELL-PALM: Really appreciate the through  
7 lines here. Thank you, Aaron, for reaffirming that this is a  
8 problem. That to get organic to be something that folks can  
9 reasonably go into without taking on a lot of risk, we need  
10 better products out there. So appreciate that.

11 MR. ZIMMERMAN: And I should have added, you know,  
12 there's more to it than my profitability on my farm. There  
13 really is. This has everything to do with the American  
14 consumer being able to trust this brand, because if they don't,  
15 it's not work a dang thing and then it's all for nought.

16 So this is incredibly important. This goes way above  
17 me. So --

18 CHAIR POWELL-PALM: Absolutely. Thank you very much  
19 again.

20 MR. ZIMMERMAN: Thank you, everybody.

21 CHAIR POWELL-PALM: Good luck for the rest of your  
22 harvest.

23 MR. ZIMMERMAN: Yeah. You bet. I'll need it.

24 CHAIR POWELL-PALM: Michelle, do we have Matthew  
25 Keegan or Jack Fehr on the Zoom?

1 MS. ARSENAULT: Matthew is with us.

2 CHAIR POWELL-PALM: Okay. Matthew, the floor is  
3 yours.

4 MR. KEEGAN: This is Matt Keegan. Can you guys hear  
5 me okay?

6 CHAIR POWELL-PALM: We can. Please go ahead.

7 MR. KEEGAN: Great. Well, thanks. Matt Keegan.  
8 I've been involved in this organic industry, I guess, for going  
9 on 20 years on the supply side. Predominantly on the feed  
10 side. Also worked quite a bit on the food side, but really the  
11 focus during my career has been on the animal feed segment, and  
12 really a global supply chain. So experience of both domestic  
13 crops, imports.

14 And so you know, I just kind of wanted to chime in  
15 here because as the previous speaker had just said, I think  
16 underlined this very well. There's a lot of concerns that if  
17 the consumer knew what actually was really going on, we have a  
18 lot of problems in this industry. And I got involved in this  
19 industry because I really believed in it.

20 There's a tremendous amount of fraud, as everybody  
21 knows. We've seen it on the domestic side. We've seen it on  
22 the import side. And I think that in a lot of ways when you  
23 look at an efficiency standpoint, we're kind of stepping over  
24 dollars to pick up dimes in a lot of ways.

25 And when you look at, say, imports. You know, the

1 imports like to be picked on, and rightly so. I mean, there's  
2 a lot of stuff going on on the import side that's very  
3 problematic. Now, as we all know, the organic program is a  
4 process-based system, right? We like to use that terminology,  
5 especially with some of these certifiers. Whether it's  
6 pesticide residue that we find in crops, or GMO, and you know,  
7 we talk about, well, you know, it was grown organically. They  
8 have a cert. We see their seed receipts. You know, this stuff  
9 ties out, wind drift, etcetera is how we kind of explain this.

10 Well, there is deliberate fraud that's going on and I  
11 would say north of 50 percent of -- say for example the organic  
12 soybean meal coming into the United States. I would say north  
13 of 50 percent of this stuff is fraudulent, blended with  
14 solvent-extracted meals.

15 And the shifty thing about this is they're blending  
16 with other than hexane. Everybody in the U.S., you know, most  
17 of these producers do hexane. Hexane meal on the solvent side.  
18 But when you look at, say, the African countries, they're using  
19 methanol, acetone. Nobody's testing for this stuff.

20 And there's precedence at the import side, at CDP,  
21 USDA, NOP, working together. There's precedence to test this  
22 cargo when it comes in. So I'm not really sure why we're not  
23 doing that.

24 If you guys recall, what was this -- in early 2000s,  
25 '05, '06, '07, somewhere around that time period, we had the

1 big melamine issue out of China. And in fairness, all that  
2 melamine is really centric to the conventional products, but  
3 the FDA got involved and said, no, we're going to apply this to  
4 all meals out of China.

5 So when the product came in, you got a nastygram  
6 letter from the FDA that said, hey, this product is adulterated  
7 (sic), and you need to either destroy it or re-export it. And  
8 if you re-export it, then okay, or prove to us that it's still  
9 organic.

10 So the point is you had to hire a lab, have the  
11 product tested, and then prove to the FDA that it was not  
12 adulterated with melamine.

13 We have the test knowledge, the labs, and everything  
14 to have this -- to put this back on the importers, have this  
15 product tested at the port. You can have these tests turned  
16 around pretty quickly and prove that the product is actually  
17 what it is. And I think that we have a tremendous issue and  
18 huge risk right now specific just to that. You know, we can  
19 put this in lots of different buckets. But you know, if we  
20 just want to talk about -- you know, we pick on -- like I said,  
21 pick on imports here for a second. This is an easy solution,  
22 and something that I think needs to be done.

23 CHAIR POWELL-PALM: And I apologize, for time, we're  
24 going to have to keep moving. But that is -- we absolutely  
25 hear you. We've got a question for you from Kim.

1           BD. MEM. HUSEMAN: Hi, Matt. In your current  
2 business, can you tell me what you do as an importer to  
3 validate your supply chain?

4           MR. KEEGAN: Every single shipment that comes in goes  
5 to three labs. We do a feed analysis so we know that what  
6 we're committing to to the customer is accurate. You know,  
7 just feed profile, moisture, protein, fat, fiber, etcetera.  
8 Okay? Then there's sample that goes off to another lab, where  
9 we do all pesticide residue. And then thirdly, another lab  
10 where we do all the solvents.

11           So it's about three pages of just solvents. There's  
12 a whole profile of a bunch of them, and it's very clear. And  
13 it sticks out like a sore thumb when you see the analysis.

14           So the request of the lab is a full solvent profile.  
15 It's not tested for hexane. And so people that are just  
16 testing for hexane, they're not getting the whole big picture.

17           BD. MEM. HUSEMAN: So two follow-up questions I have  
18 for you real quick. One is -- one would be how do you make  
19 this information transparent. And then secondly, as an  
20 importer, if you're testing at origin, and the product tests  
21 clean, and then you test at destination and something flags,  
22 how do you handle that and who becomes responsible financially?

23           MR. KEEGAN: The shipper, 100 percent. And I've had  
24 those situations. And I have to say I'm extremely disappointed  
25 with the certifiers and how they've handled these things. And



1 I know you guys need to move on, but that's a whole other  
2 topic. I will tell you this, 60 to 90 days ago, I sent a  
3 request to our certifier with specific data, test reports,  
4 organic cert, contract, all the details and said, "Listen, this  
5 is fraudulent material." There's no, oh whoops, there's wind  
6 drifts, we have solvents in the meal. That is -- somebody's  
7 actually blending that.

8 Now, the pesticides, the GMOs, okay fine, yeah.  
9 There can be wind drift, whatever. But when we're talking  
10 specifically about these solvents, this is a purpose --  
11 somebody's doing this on purpose.

12 We had a supplier who wanted to sell us some product.  
13 I said great. Send me a sample. I had them send it directly  
14 to the labs because I knew exactly what was going to happen if  
15 it came back positive for anything, and I was going to be  
16 questioned about the chain of custody with the sample. So I  
17 didn't even touch it. It went directly from supplier straight  
18 to the labs. We got the test report. I submitted to the  
19 certifier. The certifier, their first question was, "Well,  
20 what's the chain of custody?" And I said, well, I told you the  
21 chain of custody. It went straight to the lab. Basically,  
22 well, we don't believe you. I said okay, fine. I got the bill  
23 of lading, the tracking number. I said, here you go. There's  
24 the proof. They said, okay, great.

25 Then there was some kind of noise follow up, but they

1 didn't do anything. Still to this day, I have not received a  
2 response from it. And my direction to them was, listen,  
3 somebody in this marketplace is going to buy this cargo. I am  
4 not going to buy this cargo, but somebody is. And the price is  
5 cheap, so then that has implications on domestic crush. It has  
6 implications for domestic farmers. All the way down the line.

7 So the fact the certifiers are not even stepping up,  
8 because I don't think they even know what to do, frankly.

9 BD. MEM. HUSEMAN: Thank you, Matt. Sorry. We are a  
10 little short on time. I'm going to let Nate ask his questions.  
11 I kind of stepped in with three. But I really appreciate your  
12 information.

13 MR. KEEGAN: Sure.

14 CHAIR POWELL-PALM: Go ahead, Nate.

15 BD. MEM. LEWIS: Yeah. Could you provide us what you  
16 use for solvent screens? That would be tremendously helpful to  
17 see what the industry is testing for. I just didn't see any  
18 written comments on the -- and we don't need to go -- we are  
19 behind time, but if you could just, like, email us a cop of  
20 your screen or something like that, I would really, really  
21 appreciate it.

22 MR. KEEGAN: Sure. Sure.

23 BD. MEM. LEWIS: That'd be great. Thanks.

24 MR. KEEGAN: I'd be happy -- I'll send some profiles  
25 in and I'll -- I want to forward you guys the email chain too

1 with the certifier, because you're going to fall out of your  
2 chair a little bit when you see this.

3 CHAIR POWELL-PALM: We really appreciate the info,  
4 Matt, and thank you for commenting today, and we'll look  
5 forward to those communications.

6 MR. KEEGAN: Absolutely. Thank you.

7 CHAIR POWELL-PALM: Thank you. Jack Fehr. Do we  
8 have Jack Fehr on Zoom, Michelle?

9 MS. ARSENAULT: Jack is with us. He's on the phone.

10 CHAIR POWELL-PALM: All right. Fantastic. Please  
11 state your name and affiliation, Jack. The floor is yours.

12 MR. FEHR: Jack Fehr, organic farmer in northwest  
13 Iowa. We farm organic corn, soybeans, and oats.

14 I'm not as knowledgeable or educated as the last guy,  
15 but organic certification is important to me. The imports,  
16 obviously, that's all been talked about. I'd like to just talk  
17 about the certification here domestically, especially  
18 inspectors. I feel like a lot of the inspectors we've had on  
19 our farm or have dealt with just don't understand large grow  
20 crops organic farms. Maybe that's just a string of bad luck of  
21 inspectors on our parts. But we've been doing it 25 years, and  
22 never felt like any of them have been comparable or really  
23 knowing what they're looking for on a large organic farm.

24 And yeah, I don't know how that gets fixed. I think  
25 you guys probably have lots of good ideas.

1           CHAIR POWELL-PALM: You are not the first person to  
2 raise this concern, so we really appreciate it being brought  
3 back around. And there's a lot of investment right now going  
4 out for human capital improvement in the inspector space, and  
5 we heard some folks doing good work yesterday on that front.

6           Amy's got a question for you.

7           BD. MEM. BRUCH: Yeah, Jack, thanks for joining us  
8 today. I know you're busy with harvest as well. I appreciate  
9 your comments. I wanted to -- see, I know you and your family  
10 have been organically farming since the '90s. Have you had  
11 other experiences with selling products internationally and  
12 getting other inspections as well that you could highlight for  
13 us?

14           MR. FEHR: Yeah. So we went -- our oats, through  
15 grain millers, we have -- we're certified through a Chinese  
16 certification. We -- so we've had Chinese inspectors come over  
17 to certify our oat field. And they do a better job and know  
18 more about certifying organic crops not -- I mean on those on  
19 their own crop. But just large-scale farms. We felt like -- I  
20 mean, they do a better job certifying than the inspectors that  
21 we have domestically. And so then that causes an issue with  
22 how we think a lot of imports are fraudulent when our  
23 experience has been they've probably -- the inspectors, anyway,  
24 that they send over do a better job than our domestic  
25 inspectors.

1           BD. MEM. BRUCH: Could you just unpackage when you  
2 say better job. Are they asking tougher questions, or how you  
3 think it's better.

4           MR. FEHR: Yeah. Definitely. And asking the right  
5 questions. I'm trying to think of an example here. Like I  
6 said, I'm not super well-prepared. You know, I guess --  
7 there's a good way of putting it is it feels like the  
8 inspectors that we've had here domestically have not -- don't  
9 deal with a lot of large acreages and maybe these do, and so  
10 the numbers make sense to them. Where the inspectors that we  
11 have, have a hard time grasping the numbers otherwise.

12           BD. MEM. BRUCH: Thank you. Appreciate it, Jack.

13           CHAIR POWELL-PALM: We really appreciate your  
14 comments. Thanks very much for calling in today, especially  
15 during harvest. So thank you for making the time.

16           MR. FEHR: Yeah. Thank you, guys.

17           CHAIR POWELL-PALM: I know a lot of people are  
18 working on this issue. So hopefully we'll have some good  
19 updates for you in the meetings to come. Next up, we have  
20 Rhoades Yepsen, followed by Charlotte Vallaeys. We're going to  
21 take a five-minute break after Charlotte Vallaeys. And after  
22 our break, we're going to go to Heather Spalding.

23           Rhoades, the floor is yours.

24           MR. YEPSSEN: Great. Thank you so much.

25           My name is Rhoades Yepsen. I'm executive director of

1 BPI. My comments today are focused on the importance of  
2 compost for organic agriculture and the importance of compost  
3 -- that compost has in our collective efforts to combat climate  
4 change.

5 Compost is both a verb and a noun. As a verb,  
6 compost describes the biological process of transforming  
7 organic material that otherwise would have been a waste stream  
8 into something of value. This includes climactic and societal  
9 benefits with methane avoidance from landfills, communities  
10 able to participate in the circular economy rather than the  
11 linear status quo.

12 As a noun, compost is the result of that process.  
13 It's a stable soil amendment that provides climate benefits  
14 related to carbon sequestration, water retention, disease  
15 resistance, slow-release nutrients and more.

16 For the National Organic Program to participate and  
17 support the compost movement, changes are needed. The NOP  
18 definition of compost was written when compost was primarily an  
19 on-farm activity. And since then, we've seen the rise of a  
20 global movement around compost and climate change that  
21 necessitates updated definitions.

22 BPI recently petitions USCA to update the NOP compost  
23 rules, and we're happy to see that our request for the NOSB to  
24 be consulted was included in the announcement of the petition  
25 last week.

1           Like you all, BPI does not want to see synthetics  
2 allowed in finished compost, which is why we seek to address  
3 this by adding a definition of compost feed stock to the  
4 regulation, rather than looking at it through the lens of the  
5 National List.

6           I welcome your questions. I look forward to seeing  
7 you next week in Providence, and BPI is open to organizing a  
8 meeting once the Board has had a chance to evaluate the  
9 petition. Thank you.

10           CHAIR POWELL-PALM: Thank you very much. Allison has  
11 a question for you.

12           BD. MEM. JOHNSON: Yeah. Thanks for being here,  
13 Rhoades.

14           PFAS is a concern in compost, and I wonder if you can  
15 speak a little bit to BPI's approach to excluding PFAS and also  
16 any sort of development in detection of PFAS since your  
17 standards were created.

18           MR. YEPSEN: Yes. Thank you. PFAS is certainly very  
19 concerning. BPI identified this back in 2017 and established a  
20 rule prohibiting the use of PFAS in compostable products. So  
21 way ahead of the state regulations.

22           Many states are also tackling this through  
23 requirements modeled after BPI's rules, so prohibiting the use  
24 of PFAS in all types of packaging, not just compostables. And  
25 there have been a lot of advancements in testing, both on the

1 packaging side, as well as on soil and compost. But it remains  
2 a challenge, you know, for test methods, the sensitivity of  
3 tests, identifying specific chemical compounds.

4 BPI's approach to think has been through a multi-  
5 tired mechanism. So we have a total organic fluorine test as a  
6 proxy. This is one way to conduct screens to cast a wide net,  
7 rather than focusing on individual chemical compounds because  
8 there are so many. But then we've also established rules  
9 around screenings for all ingredients used, regardless of how  
10 small. That's been probably the most effective means for BPI  
11 to be able to screen for PFAS. So looking at all of the  
12 ingredients used, and then going far enough through the supply  
13 chain to identify the chemical compounds.

14 We're hopeful that there will be more federal action  
15 around PFAS. We think that, you know, really it's the  
16 production and use of them further upstream that needs to be  
17 taken into consideration because, you know, as we've seen with  
18 EPA, it's really going down into the parts for trilling and  
19 drinking water. So this really signals the importance of  
20 tackling this, looking at the production of these chemicals.

21 CHAIR POWELL-PALM: Nate, please go ahead.

22 BD. MEM. LEWIS: Yeah. As we kind of start engaging  
23 on the topic and response to the petition, and a general  
24 interest on the Board to update the compost regulation, we  
25 welcome input on who needs to be at the table and what that



1 partnership map looks like. I think that's kind of the stage  
2 we're at right now. So, you know, we don't need to make the  
3 list right now on this webinar because we're already like an  
4 hour and a half behind, but just keep in mind that that's the  
5 kind of information that I'm particularly intrigued to get.

6 So obviously, the petitioner, the compost industry,  
7 there's some clear players, but if we can help -- if you can  
8 help us paint that partnership map, I would be tremendously  
9 grateful.

10 MR. YEPSEN: Yes. I'd be happy to. Thanks.

11 CHAIR POWELL-PALM: Thank you very much for your  
12 comments today.

13 MR. YEPSEN: Yeah. Thank you.

14 CHAIR POWELL-PALM: Next up, we have Charlotte  
15 Vallaeys. After Charlotte, we'll take a five-minute break.  
16 After our break, we'll go to Heather Spalding, Greg, Schreiner,  
17 and Francis Thicke.

18 Charlotte, the floor is yours.

19 MS. VALLAEYS: All right. Thank you. Hi, everyone.  
20 My name is Charlotte Vallaeys. I am the organic expert at  
21 General Mills. First, thank you all -- to the Board members  
22 for your time and dedication to organic.

23 General Mills is a 155-year-old company and a leading  
24 producer of certified organic packaged food in the United  
25 States. We are a proud member of the Organic Trade

1 Association. So please refer to their comments on other topics  
2 that are on the agenda that I will not be speaking out.

3 But I would like to just give a general comment on  
4 the discussion document on opportunities in organic, and  
5 specifically on expanding opportunities for organic farmers  
6 with a consumer basing promotion initiative.

7 At General Mills, we've long-recognized the value of  
8 organic practices for consumers, farmers, and the planet. As a  
9 global food industry leader, we understand that organic is an  
10 approach to food production with many positive environmental  
11 and social outcomes. The potential for growth in organics is  
12 significant. And we recognize the important role that our  
13 company plays in assisting organic farmers and expanding their  
14 businesses. Specifically, by increasing their access to  
15 organic markets.

16 To succeed in producing and selling more organic  
17 food, it is crucial for consumers to fully understand the  
18 benefits of the USDA organic seal. We are doing our part to  
19 help educate consumers about organic benefits in several ways.

20 We were part of the OTA task force that created a  
21 data-driven tool kit on the organic wheel of sustainability,  
22 which highlights the many ways that organic is good for the  
23 planet, people and animals, and business. We recently updated  
24 the back of pack for our Cascading Farms cereal boxes to  
25 highlight some of the aspects of that organic label

1 sustainability, and we call out that organic is good for the  
2 planet. And specifically with several benefits, including that  
3 organic agriculture regenerates soil health, reduces chemical  
4 pollution, and promotes ecological balance.

5 We also support non-profits that OFRF, Organic  
6 Voices, and the Organic Center that do critical work to raise  
7 awareness of the many ways in which organic is good for people  
8 and planet. We appreciate recent investments from the USDA and  
9 supporting the transition to organic farming, and building on  
10 this momentum, we are asking for consideration of a consumer  
11 facing organic promotion initiative, which would further  
12 support public and private sector investments in organic  
13 agriculture and practices. Thank you.

14 CHAIR POWELL-PALM: Thank you very much for your  
15 comments. Questions for Charlotte from the Board. Amy has a  
16 question for you.

17 BD. MEM. BRUCH: Yeah. Thanks, Nate. Charlotte,  
18 thanks for participating in our process and for just what --  
19 everything that General Mills is doing. I don't necessarily  
20 have a question. I just have just a comment to kind of take to  
21 heart today, and on Tuesday, our public commenters from farmers  
22 really wanted help in expanding markets, especially for  
23 domestic grown organic products. And then consumers we heard  
24 from, they wanted more education because I think there's -- the  
25 opportunity to grow organic is a lot bigger than it is. We

1 just need to have more education to our consumers so they know  
2 exactly what the label represents.

3 So any help you can do in those two categories, and  
4 continued help, would be greatly appreciated. Thank you.

5 MS. VALLAEYS: Thank you.

6 CHAIR POWELL-PALM: Nate has a question for you.

7 BD. MEM. LEWIS: Not a question. Just to celebrate  
8 the relationship with Rodel (ph), a Cascadian home farm close  
9 to my home. Really appreciate your all's attention to that.  
10 It's a fantastic birthplace of kind of larger scale veg and the  
11 Cascadian brand. So that's really great, and I really hope the  
12 ice cream shop opens up again soon.

13 MS. VALLAEYS: Very well, thank you. If I may just  
14 respond to that comment in case others aren't aware. But  
15 General Mills donated the Cascadian Farm, home farm, that was  
16 founded over 50 years ago by Gene Kahn to the Rodel Institute,  
17 and it will now be -- or it is already a research and education  
18 center, a regional center for Rodel.

19 CHAIR POWELL-PALM: Allison has a question for you.

20 BD. MEM. JOHNSON: Thanks. At the risk of being the  
21 one that keeps us from our break for another minute, I  
22 appreciate you being here, Charlotte, and all of your  
23 leadership.

24 Are you seeing much connection with the TOP program,  
25 the Transition to Organic Partnerships program from where you

1 sit, or are you getting connected with producers or getting  
2 integrated into the partnership web that is growing out of that  
3 initiative?

4 MS. VALLAEYS: Not directly integrated. I mean, love  
5 to see what's happening and we actually created our own --  
6 again, with Rodel partnership, to put more consultants in our  
7 own supply chain. So we're really kind of linking it to our  
8 own growers to help them transition, not just to organic  
9 because they already are, but keep improving their practices,  
10 especially the earlier conversation about no till and organic  
11 can't be, you know, climate smart if they till. And so it's  
12 just getting that kind of agronomic advice in our own supply  
13 chain is what we're focusing on.

14 And just for the record, I completely agree that, you  
15 know, that there's a lot of misinformation about no till and  
16 its impact. Yeah, I just wanted to clarify that.

17 CHAIR POWELL-PALM: Thank you very much for your  
18 comments. And I would echo everyone who said, it's pretty cool  
19 to see the investment General Mills is making in organic. So  
20 thank you very much. And we're excited to tackle these  
21 questions of how do we spread the word from General Mills down  
22 to five-acre farmers, everyone seems to be saying the same  
23 thing that this is too good a secret to keep. So thank you  
24 again for joining us today.

25 MS. VALLAEYS: Thank you. Bye.

1 CHAIR POWELL-PALM: All right. Folks, it is six  
2 minutes past the hour. Lets come back at 11 minutes past the  
3 hour for the break. After the break, we'll go to Heather  
4 Spalding, Greg Schreiner, and then Francis Thicke.

5 (Break 4:06 p.m. to 4:11 p.m.)

6 CHAIR POWELL-PALM: If you could state your name and  
7 affiliation, the floor is yours.

8 MS. SPALDING: Thank you so much. Good afternoon,  
9 Chairman Powell-Palm and members of the NOSB. I'm Heather  
10 Spalding, deputy director of the Maine Organic Farmers and  
11 Gardeners Association, MOFGA.

12 We're a broad-based community, working to create a  
13 food system that's healthy and fair for all of us. Through  
14 education, training, and advocacy, we're helping farmers  
15 thrive, making more local organic food available, and building  
16 sustainable communities. We certify 535 organic farms and  
17 processing operations, representing roughly 90 million in sales  
18 and we have roughly 15,000 members, many of whom are organic  
19 gardeners and homesteaders, and all of whom are organic food  
20 consumers, depending on us to uphold the integrity of the  
21 National Organic Program rule.

22 I'd like to briefly highlight a few of the items in  
23 our written comments that we sent to you. We urge you to adopt  
24 a rigorous review process for inert ingredients to ensure that  
25 toxic materials that otherwise would not be permitted on the

1 National List are kept out of products approved for organic  
2 management. The revision to the National List regarding inerts  
3 must include a full evaluation of human health effects,  
4 including endocrine disruption, environmental impacts, whether  
5 there are suitable non-synthetic alternatives, and  
6 compatibility with a system of organic agriculture.

7           Regarding consistency in parcel location  
8 identification, we agree that certifiers should know the  
9 locations of all operations. Our staff and contract inspectors  
10 feel good about the systems we use. GPS is just one tool in  
11 the toolbox, but should not be mandated to be used by all.

12           Regarding residue testing, we support NOSB's proposal  
13 to require testing for handling operations. And thank you so  
14 much for starting that work. Regarding racial equity, we hope  
15 you'll apply USDA's 2023 equity commission recommendations and  
16 embed racial equity in NOSB programs.

17           We continue to oppose the use of the organic label by  
18 hydroponic operations. In our written comments, we've provided  
19 a copy of the organic agriculture is soil-based position  
20 statement, which we helped draft, and which is endorsed by  
21 certifying agencies and businesses across the country.

22           And finally, we'd like to highlight the urgent need  
23 for coordinated action at the federal level to address the  
24 escalating crisis of PFAS contamination in our food and ag  
25 system. This isn't a Maine issue. It's ubiquitous. PFAS is

1 everywhere and lasts forever. More than 4,100 farms across the  
2 country recently have been, notified by the Department of  
3 Defense about the threat of PFAS contamination from nearby DOD  
4 training exercises. We hope that all participants in the  
5 meeting, the NOSB members, speakers, viewers, everyone  
6 attending will reach out to their members of Congress and  
7 encourage them to cosponsor the Relief for Farmers Hit with  
8 PFAS Act.

9 Thank you so much for your tireless efforts as NOSB  
10 members.

11 CHAIR POWELL-PALM: We really appreciate your  
12 comments. Thank you for joining us. Questions from the Board?

13 All right. Thank you so much, Heather.

14 MS. SPALDING: See you next week.

15 CHAIR POWELL-PALM: See you next week. Next up we  
16 have Greg Schreiner, followed by Francis Thicke, and then Dave  
17 Chapman.

18 MR. SCHREINER: Good afternoon, everybody.

19 CHAIR POWELL-PALM: Good afternoon.

20 MR. SCHREINER: My name is Greg Schreiner. And I  
21 want to start my comments by thanking the National Organic  
22 Standards Board for the work you've all done in the organic  
23 industry. So thank you.

24 Again, my name is Greg Schreiner, and I've been an  
25 organic farmer for over a decade. I own Silver Reef Organic



1 Farms that rotates between beans, corn, and small grains.

2           When I first bought the farm, my financial  
3 institution required crop insurance to protect the loan. I  
4 soon learned that made the difference in keeping the farm over  
5 the last decade. First, let me say that I do not believe that  
6 the National Organic Standards Board document is missing any  
7 important problems, factors, and topics. I also believe that  
8 this document accurately reflects the challenges that organic  
9 farmers face regarding crop insurance.

10           As stated in the NOSB report, crop insurance works  
11 well for some farmers, and my comments will address how we get  
12 crop insurance to work well for more organic farmers.

13           There is a need for a robust marketing campaign to  
14 educated farmers on the opportunities to use crop insurance to  
15 mitigate risk. I have read and used all of the amazing  
16 informative tools on the United States Department of  
17 Agriculture risk management website. Yet until this request  
18 for comment was introduced, I really didn't know that this  
19 information was available.

20           I can appreciate why RMA promotes its website through  
21 its webinars, university extension offices, and other  
22 trainings, but there is still a disconnect between farmers  
23 knowing and using the tools available.

24           When I reached out to other farmers, none of them  
25 actually knew about this website. Direct marketing could be

1 sent to specific organic groups, trade associations, beginning  
2 farmer associations, and more specifically to the certifiers.

3 As the NOSB noted, the T yield is not liked by anyone  
4 and for good reason. This contributes to many farmers not  
5 adopting crop insurance because their coverage level will not  
6 sufficiently mitigate risk versus cost.

7 I have not been able to find any data on how T yields  
8 are discovered and established. We need a better data that can  
9 accurately reflect organic T-yields. In the meantime, my  
10 suggestion is a 20 percent reduction against conventional T  
11 yields for an organic farmer per county. Based on the thoughts  
12 and the comments earlier, which are a good conventional farmer  
13 comes a good organic farmer.

14 More farmers will buy crop insurance, insurance with  
15 payouts better reflect organic pricing and production. I would  
16 suggest that the USDA collect organic pricing by region, as  
17 this data could also be used to help establish better and more  
18 accurate crop insurance protection. I also believe that most  
19 farmers would adopt federal crop insurance if the premium due  
20 date was scheduled within 30 days after harvest. This would  
21 allow the farmer to harvest, deliver, and receive payment for  
22 the crop and cover any premiums due.

23 Operational costs often take priority over the  
24 insurance premiums in the growing season and allowing the  
25 farmers to pay post-harvest with reduced financial obstacles.

1 In closing, that you all for the opportunity to give you my  
2 solutions to some of the issues facing organic farmers. Thank  
3 you.

4 CHAIR POWELL-PALM: Thank you very much. Questions  
5 for Greg? I think that's just a fantastic idea, Greg. I  
6 really appreciate that timing question for just regular cash  
7 flow. How do we help farmers keep the business going. So  
8 appreciate you joining us today and thank you for making the  
9 time. I know it's a busy time of year.

10 MR. SCHREINER: All right. Thank you very much.

11 CHAIR POWELL-PALM: Next up we have Francis Thicke,  
12 followed by Dave Chapman, and then Kirsten Novak.

13 Francis, the floor is yours. And I -- we don't have  
14 you unmuted yet. There we go.

15 MR. THICKE: All right. My name is Francis Thicke.  
16 I'm an organic dairy and crop farmer from Iowa.

17 I first started farming organically in 1975. And  
18 what I'd like to do is look at from that perspective some of  
19 the problems from today. Back then, the pioneer organic  
20 farmers did it for principle, not profit. We didn't really  
21 have a market. But I think we were doing real organic farming  
22 with crop rotations, cover crops, compost, manure, and such.  
23 And it was real regenerative.

24 As a matter of fact the Rodal Institute had a  
25 magazine out called the New Farm, the magazine of regenerative

1 agriculture. But that term regenerative kind of disappeared  
2 for 40 years.

3           Now, I'll fast forward to the late '90s and the early  
4 2000s. As organic became a multi-billion-dollar industry, the  
5 big food organizations saw that, and they wanted a piece of the  
6 pie. Actually, in many cases, they wanted the whole pie, and  
7 things like organic blueberries, organic tomatoes, and other  
8 fruits and vegetables, they -- what did they do? They scaled  
9 up. They industrialized it.

10           And how did they do it? Things like hydroponics,  
11 like cows in caysols (ph.) chickens in big warehouses. And so  
12 it was an industrialization of organic. And USDA has never  
13 really been able to combat that. And really it's because the  
14 food industry has a huge lobbying wing. I understand there are  
15 1,200 lobbyists for food and agriculture, lobbying Congress,  
16 and lobbying USDA, frankly. And so we've not been able to make  
17 progress on trying to eliminate hydroponics, or even the big  
18 caysols, or the chicken warehouses.

19           So the Real Organic Project became critical and  
20 necessary. And I'm happy to be Real Organic Project certified.  
21 My customers know that we are doing real organic. But now  
22 today, we have a new thing coming on, regenerative agriculture  
23 and climate smart. And the industry has been really smart at  
24 co-oping organic, and they've been very quick to try to co-op  
25 regenerative agriculture and climate smart agriculture. They

1 can see that if they can put that on their Cheerios box and  
2 their Wheaties box, that's going to be a real plus for them.  
3 But they want to make it again, like with organic, as cheaply  
4 as possible. They want to take business as usual, and label it  
5 as regenerative or climate smart. And we have to watch out for  
6 that.

7           And so no till and round up are considered climate  
8 smart for many people. And we know that's not -- that most  
9 people wound up with a short-term cover crop does not really  
10 regenerate the soil. We need to have more robust cover crops  
11 in rotations to make that happen.

12           And so I think we can do that with real organic, and  
13 to me, real organic is real regenerative. Thank you.

14           CHAIR POWELL-PALM: Thank you for your comments.  
15 Questions from the Board? We appreciate it, Francis. Thank  
16 you for joining us today.

17           MR. THICKE: Thank you.

18           CHAIR POWELL-PALM: Next up we have Dave Chapman,  
19 followed by Kirsten Novak, and then Adele Durfey.

20           Dave, the floor is yours. Welcome.

21           MR. CHAPMAN: Hey. Thank you, Nate. I'm Dave  
22 Chapman, farmer and co-director at the Real Organic Project.

23           I want to address some recent efforts at reform with  
24 the NOP. \$300 million are dedicated to the new organic  
25 transition initiative. That could be a very hopeful sign.

1 Strengthening organic enforcement could be a very hopeful sign.  
2 But it appears to me that the SOE is creating a huge burden on  
3 the very farms that are the backbone of organic. And I wonder  
4 what massive fraud it is preventing.

5           What huge CAFO will be closed down by the updated  
6 OLPS. I suspect none. We have to distinguish between new  
7 regulations that create actual reform and those that just check  
8 off a box, but don't change reality. The \$300 million is an  
9 attempt to address the plummeting rate of farmers who  
10 transition to organic. It is down 70 percent from the  
11 transition rate in 2008. But wouldn't it be vastly better to  
12 actually enforce the law? Prohibit ruminants living in  
13 confinement from being certified as organic? Prohibit  
14 hydroponic from being certified as organic? Then let the  
15 market reward farmers who are doing it right. Build it and the  
16 farmers will come, and so will the eaters.

17           The complicated part is why is this failing? We all  
18 agree that real organic is based on soil health, not on  
19 processed fertilizers. We all agree that we want to eat real  
20 organic eggs that come from hens that go outside and scratch in  
21 the soil. None of us want those CAFO eggs. We all agree that  
22 we want to drink milk coming from cows who graze in a diverse  
23 pasture.

24           Organic in the EU follows the principles of organic.  
25 Hydro is prohibited. And sales there are growing faster than

1 USDA organic in the marketplace. Right now, there are a billion  
2 dollars ahead of U.S. organic food sales. The U.S. has about  
3 20,000 farms certified as organic. There are 350,000 certified  
4 organic producers in the EU.

5 The U.S. has 9 million acres of certified organic  
6 farmland. The EU has 40 million acres. Is it possible that  
7 maintaining integrity and transparency is a better strategy for  
8 the growth of organic than building a so-called big tent to  
9 welcome multi-nationals, who will twist the meaning of organic.

10 The NOSB has known this in the past. Francis Thicke  
11 who just spoke organized a letter to Secretary Vilsack in 2021.  
12 It called out the disintegration of the National Organic  
13 Program. It was signed by 43 of your predecessors. They wrote  
14 that, "The integrity of the National Organic Standards has  
15 eroded significantly over the years."

16 None of this is a settled issue. It will never be  
17 settled until it is made right. I call on you to follow in the  
18 footsteps of those 43 former NOSB members. We need all hands  
19 on deck to fix organic before we lose it. There's a real  
20 danger. It will not be easy. Thank you very much.

21 CHAIR POWELL-PALM: Questions for Dave from the  
22 Board? All right. We appreciate your time, Dave. Thank you.

23 MR. CHAPMAN: You bet, Nate.

24 CHAIR POWELL-PALM: Next up -- we do have Kirsten,  
25 Michelle? Kirsten Novak?

1 MS. ARSENAULT: Yeah. She's on.

2 CHAIR POWELL-PALM: All right. Fabulous. Kirsten,  
3 the floor is yours.

4 MS. ARSENAULT: She's on mute. Hold on one second.

5 CHAIR POWELL-PALM: And you're on mute. Let's see --  
6 it should prompt you to unmute, if you want to self-unmute.

7 MS. ARSENAULT: Let me do it again. Hold on.

8 No.

9 CHAIR POWELL-PALM: Not yet.

10 MS. ARSENAULT: I'm not getting --

11 CHAIR POWELL-PALM: Kirsten, are you able to try to  
12 just hit the unmute button on your end?

13 MS. ARSENAULT: It won't let her because -- so,  
14 Kirsten, are you getting a pop-up message on your screen that  
15 says the host has asked you to unmute? And it didn't work.

16 CHAIR POWELL-PALM: Are you on a cell phone, Kirsten?  
17 Okay.

18 UNIDENTIFIED SPEAKER: Hit star 6.

19 CHAIR POWELL-PALM: Hit star 6. See if that works.  
20 I'm not sure if that works with the app versus calling in.

21 MS. ARSENAULT: Didn't work. All right. We can work  
22 on getting you unmuted. Nate, if you want to move to the next  
23 person.

24 CHAIR POWELL-PALM: We'll jump to the next person,  
25 Kirsten. Stand by and we'll figure it out. Thank you.



1 All right. Let's jump to Adele Durfey next. Adele,  
2 if you're there.

3 MS. ARSENAULT: We see an unknown phone number on the  
4 list, but I don't know if it's Adele, so we don't know who to  
5 unmute. All right. Got it. I'm asking Adele to unmute now.  
6 And, Adele, if you are only on the phone, you may have to hit  
7 -- there were go, star 6.

8 MS. DURFEY: Hi, there. It looks like I'm unmuted.  
9 I heard the issues with the person right before me. So hello.  
10 My name is Adele Durfey and I am the director of sustainability  
11 at Clear Frontier Ag Management, which is an organical ed fund.

12 I only had just a couple of bits that I wanted to  
13 cover today, but I think it might take the full three minutes,  
14 so I'll just dive in.

15 I think the first piece that is very important is  
16 that we have standardized location information. It's very  
17 important for certifiers and inspectors to have consistency  
18 when receiving information about the whereabouts of certified  
19 operations. And it's especially important since the NOP is a  
20 global program, receiving imports from countries certified to  
21 the NOP, but have no comparable standards in their country.

22 So that could take form -- that could take the form  
23 of a GPS location, or similarly, a section, township, range  
24 location information that could then be translated into a GPS  
25 geo-locations, but I feel like it's very important to track

1 information across different regions and different geographies.

2           Excuse me. So the second issue I wanted to touch on  
3 is the testing of important products both on the quantity being  
4 tested and the breadth of chemicals in which they are being  
5 tested for. So as far as I understand, only five percent of  
6 imports are being tested currently. And I spent quite a bit of  
7 time abroad in the country of Ukraine, and we're talking eight  
8 plus years, and helping to manage 130,000 acres. At that point  
9 in time, an organic production was almost non-existent.

10           And so even today, some years later, if those farms  
11 have multiplied or that percentage has gone up, I would really  
12 doubt that the farms would not get the volume of exports that  
13 are tagged as originating from the country as organic.

14           So I can only speak from my personal experience on  
15 Ukraine, but I think that any third world country or any close  
16 to third world country that does not have repercussions for not  
17 adhering to a standard, will just simply not adhere to these  
18 standards.

19           But I also wanted to mention in addition to this,  
20 similarly, the lack of organic production that was prevalent in  
21 Ukraine was actually the prevalence of GMO production. So  
22 although Ukraine is a non-GMO country and prohibits all GMO  
23 products, even to the extent that they might put a non-GMO  
24 sticker on their water bottle, it was actually a rare  
25 occurrence for me to see, particularly on large-scale farms,

1 farms that did not have some GMO crops in their field.

2 So there does exist an under-shadow market of GMO  
3 products being imported and exported, but Ukraine currently  
4 does not have the mechanisms or the control mechanisms in place  
5 to even manage their own legislature.

6 So I'm not just speaking specifically about Ukraine.  
7 What I'm trying to do is use Ukraine as an example and draw  
8 parallels as to why more rigorous testing needs to be  
9 implemented both in volume and with an updated and completed  
10 list of herbicides, insecticides, fumigants, because the  
11 reality is that we are being charged for products that we are  
12 likely -- that are likely not legit USDA organic. That's all I  
13 have. Thank you.

14 CHAIR POWELL-PALM: All right. We really appreciate  
15 your calling in today. Questions from the Board? Many many  
16 thanks for making the attempt to make your voice heard today.  
17 Thank you very much.

18 MS. DURFEY: Thank you.

19 CHAIR POWELL-PALM: We're going to jump back to  
20 Kirsten. I think we've got the mute issue figured out.

21 MS. NOVAK: Yes. Can y'all hear me now?

22 CHAIR POWELL-PALM: We can. Please go ahead.

23 MS. NOVAK: All right. Perfect. All right. Well,  
24 I'm Kirsten Novak and I'm a proud mother of five children. And  
25 my husband and I currently are in process of actually

1 transitioning our small little farm from a conventional  
2 operation to organic, and I wanted to share with you the  
3 importance of why I feel like proper labeling and why organic  
4 is so vitally important.

5 About three years -- or about a year ago, three out  
6 of my five children became very sick with many different  
7 diagnoses. And when we had sought out as much medical help as  
8 we possibly could through the conventional medical system and  
9 when they failed us, we reached out and found a holistic  
10 doctor.

11 Well, she was very smart and she actually tested our  
12 kids for glyphosate. Once we were able to do the testing, we  
13 found out that all of our children, including us, had extremely  
14 high levels of glyphosate. Now, let me just tell you that yes,  
15 we are surrounded by farms around us that use glyphosate, but  
16 our small operation hasn't used glyphosate in quite some time.  
17 And we have ten acres that is completely organic.

18 However, we eat 90 percent organic because we really  
19 believe strongly in that. Yet our kids still became very ill.  
20 And so we are very passionate about the labeling and education  
21 of organic, especially for parents and not just for parents,  
22 but really for farmers. Because if we can't get farmers in  
23 America to understand the process of transitioning to organic  
24 in their farms and being able to understand completely what  
25 this does for them and our environment, and for our food

1 source, then we are not going to be able to produce the amount  
2 of organic foods necessary in America, as I know many of them  
3 are imported.

4 I feel strongly that finding the truth in organic is  
5 so vitally important, and we know that organic truly does give  
6 us the best standard. I would also add to the gentleman that  
7 spoke a few minutes before me about region rate of farming, and  
8 I would love to see some sort of labeling that allows organic  
9 and region rated farms to have a joint label of some sort.

10 As a mother and as a farmer, I believe that that is  
11 our best standard. And so if we can come along side of the  
12 regenerative farm, you know, practices and really let the  
13 consumer know what that actually means, I feel like organic  
14 will truly rise to the top and why we need funding to be able  
15 to do that.

16 CHAIR POWELL-PALM: Well, we are so glad we were able  
17 to get you off mute. Thank you for making your comment today.  
18 We've got a question for you from Brian.

19 BD. MEM. CALDWELL: Thanks, Kirsten. Just two quick  
20 questions. First of all, where are you located, and second of  
21 all, do you have any idea where the source of your family's  
22 glyphosate ingestion or exposure might have been?

23 MS. NOVAK: Yes, I do actually. So great question.  
24 So I'm from Iowa. And so in Iowa, we have nothing but farm  
25 fields around us everywhere. And so even though our small

1 little operation, we do -- we're actually transitioning our  
2 farm. But we have well water and we actually had our well  
3 tested, and sure enough, our water had glyphosate in the water.

4 As you remember with COVID, we would never drink our  
5 water because I was always fearful of that, being that there  
6 was a field next to us where our well resides, thinking that  
7 maybe there could be some glyphosate there. And so we ended up  
8 having our water testing when our kids were -- we were off the  
9 charts in glyphosate. And sure enough, our water was extremely  
10 high.

11 Now, it's so unfortunate because, you know, FDA, and  
12 our water supply, and all of that in America does not test for  
13 glyphosate. And we actually had to go through a third party to  
14 get that water tested. And then, of course, eating anything  
15 that is not organic, ideally you know regenerative processed  
16 based, you know, glyphosate and other farm chemicals can still  
17 get into organic products through operation. So -- yes.

18 BD. MEM. CALDWELL: Great. Thank you very much.

19 MS. NOVAK: Any other questions?

20 CHAIR POWELL-PALM: Well, we really appreciate your  
21 time today. Thank you so much for calling in and sharing that  
22 story. And I think we're hearing the theme. We need more  
23 education, and it's, again, a big lift on all of us to try to  
24 get the word out there. So thank you very much for sharing  
25 that with us.

1 MS. NOVAK: Can I add one quick thing about education  
2 too, I'm sorry.

3 CHAIR POWELL-PALM: Sure. Go ahead.

4 MS. NOVAK: I will say, as we're coming from a  
5 conventional farm practice, my husband is the one who was  
6 farming all of this life. And the farmer in the '70s and '80s  
7 believed that, you know, sprays were kind of the answer to  
8 efficiency, right? So it's really hard to get that older  
9 farmer into an organic type of practice.

10 However, the new farmers that are coming up really  
11 want to do what is right for the community. And I will say,  
12 when we go to feed events and different things like that, the  
13 GMO producers and the chemical companies are really knocking  
14 down organic because they're saying it's just a labeling  
15 gimmick. It's just something that people are labeling, but  
16 it's not truly organic.

17 And I think that's where we need to really focus our  
18 education, and it's to the farmers. So that that way, they  
19 truly understand what's in it for them financially to go  
20 organic, what's in it for the environment, and what's in it for  
21 the health and safety of this next generation.

22 So unfortunately, Monsanto and Bayer are hitting it  
23 pretty hard against organic, and I think that's where we have  
24 to fight back and give truth, and give great education to  
25 farmers.

1 CHAIR POWELL-PALM: I couldn't agree more. Really  
2 appreciate the specific examples and stay in touch with us. We  
3 want those ideas. We want to figure out how to build out these  
4 campaigns. So thank you.

5 MS. NOVAK: Yes. Thank you so much.

6 CHAIR POWELL-PALM: Next up we have Rob Peters,  
7 followed by Sylvia Wu, and then Anais Beddard.

8 Rob, if you're there, the floor is yours.

9 MR. PETERS: Good afternoon, how is everybody today?

10 CHAIR POWELL-PALM: Doing well. Thank you.

11 MR. PETERS: Excellent. Okay. I don't want to take  
12 up more than three minutes, so I'll get started right away.

13 So Rob Peters with Nature Fresh Farms. We are a  
14 conventional and organic greenhouse located in Delta, Ohio,  
15 with over 90 acres, including North America's first organic  
16 strawberries under glass. So heavily invested in the organic  
17 area.

18 But today, I'm speaking on behalf of the Organic  
19 Produce Association. We are one of the original members of  
20 that association, so I'm here to speak on behalf of the other  
21 members in the entire group.

22 So the OPA is the only organization solely  
23 representing the organic produce industry. We strongly support  
24 the work of the NOSB in the National Organic Program. As you  
25 continue to support a growing and changing organic industry.



1 This means leaning into technological advances as appropriate,  
2 while continuing to ensure that growing methods are adhering to  
3 the USDA's gold standard organic requirements.

4 The OPA supports the USDA's efforts to assist  
5 producers as they transition into organics. The OPA members  
6 have grown organic produce both in ground and in controlled  
7 environments for decades.

8 As you know, currently produce operations wishing to  
9 transition from conventional to organic production must undergo  
10 the three-year transition period to ensure the absence of  
11 prohibited substances. As technological advances continue,  
12 this three-year transition period is not reflective of all the  
13 production methods, some of which inherently have never been  
14 introduced -- has never used prohibited substances before.

15 In addition to providing all other types of support  
16 for growers wishing to transition to organic, we believe that  
17 the time has come to discuss an alternative to the three-year  
18 transition period. It is undoubtedly a barrier into organic  
19 transition and we know that that is something that everybody on  
20 this call is really pushing for.

21 So we believe that all growers should have -- should  
22 be provided an option to test out of the three-year  
23 requirement, if all other applicable requirements have been  
24 met. To that end, we support an option for all growers to be  
25 allowed to -- to apply for and receive an organic certificate

1 with no waiting period if they can demonstrate adequate organic  
2 soil health certification, be an approved soil testing standard,  
3 or in the alternative, if another growing media is used.

4 This test should be carried out by a USDA accredited  
5 certifying agent, and show not substance prohibited by the  
6 USDA's national list of allowed and prohibited substances. As  
7 a precursor to this, the USDA should begin work with  
8 accrediting certifying agents to provide guidance on soil  
9 testing procedures to certify that no substances that are  
10 banned on the list are actually present.

11 While the OPA understands that this proposal would be  
12 a significant shift within the National Organic Program, we  
13 also believe that to truly foster a more inclusive, diverse,  
14 and equitable organic sector, the NOP should consider ways to  
15 break down all barriers to organic transition, including this  
16 three-year transitional period, where appropriate.

17 Again, the OPA would like to thank the NOSB, as well  
18 as the NOP, for your dedication and work on behalf of all  
19 organic producers. We really look forward to continuing to  
20 work together to address all barriers to organic transition and  
21 production, including any future work on container standards  
22 and other issues. Thank you.

23 CHAIR POWELL-PALM: Thank you. Jerry has a question  
24 for you.

25 BD. MEM. D'AMORE: Good afternoon, Robert. You used

1 the term CEA, controlled environment agriculture?

2 MR. PETERS: That's correct.

3 BD. MEM. D'AMORE: Yeah. That does not speak to the  
4 delivery system, to the plant. So what -- so you've got the  
5 structure. How -- are you in hydroponics? Are you in NFT  
6 hydroponics? Are you in soil?

7 MR. PETERS: In soil.

8 BD. MEM. D'AMORE: In what, please?

9 MR. PETERS: Cocoa bags.

10 BD. MEM. D'AMORE: Okay.

11 MR. PETERS: Like Grodan bags, slats, different  
12 things like that.

13 BD. MEM. D'AMORE: Okay. Those two terms don't mix  
14 with me very well, but we can just go offline on that, if it's  
15 all right with you.

16 MR. PETERS: Okay. Yeah. It's a soil. It's a  
17 growing medium.

18 BD. MEM. D'AMORE: Inert?

19 MR. PETERS: Yes.

20 BD. MEM. D'AMORE: Okay. It's hydroponics. From my  
21 perspective, now we know where we can start. Thank you very  
22 much.

23 MR. PETERS: My apologies.

24 BD. MEM. D'AMORE: No, no, no. Maybe mine.

25 CHAIR POWELL-PALM: Nate, please go ahead.

1           BD. MEM. LEWIS: Appreciate your comments. Just to  
2 reference the law that we all operate from, that is what is the  
3 -- that's what states the three-year transition requirement.  
4 So a better forum might be your congressperson and Senator for  
5 promoting that change, because it would take, at least my  
6 understanding, an act of Congress to remove that barrier. So  
7 -- but I appreciate your comments.

8           MR. PETERS: Thank you. I appreciate the advice.

9           CHAIR POWELL-PALM: All right. Thank you for joining  
10 us today.

11          MR. PETERS: Thank you very much for your time, guys.

12          CHAIR POWELL-PALM: Next up we have Sylvia Wu,  
13 followed by Anais Beddard, and then Gwendolyn Wyard.

14          Sylvia, if you are there, the floor is yours.

15          MS. WU: Hi. Good afternoon, everyone. My name is  
16 Sylvia Wu, and I'm an attorney with the public interest  
17 organization Center for Food Safety. The Center for Food  
18 Safety is dedicated to protecting people in the environment  
19 from the negative impacts of industrial agriculture. And in  
20 that same vein, we've been a long-time supporter of organic  
21 food production and protecting and defending organic integrity.

22                 I like to you a little -- just my time today, and  
23 hopefully not take up too much of your time, on the issue of  
24 inert ingredients and pesticides for organic production.  
25 building on a lot of the comments that you guys have already

1 heard today.

2           The main point that I want to make is that as the  
3 Board continues to address the issue of inert ingredients in  
4 organic pesticides, that the Board must not accept any blanket  
5 allowance of inert ingredients based on EPA's classifications.  
6 Instead, to comply with OFBA, inert ingredients and pesticides  
7 for organic production must be specifically petitioned,  
8 reviewed, and approved by the Board under the National List  
9 process.

10           This is because the EPA's review process and  
11 authorities are entirely different from the NOPs under OFBA.  
12 OFBA was written to specifically limit synthetic materials to  
13 only those absolutely necessary. And the EPA's review is  
14 entirely lacking in that prohibition.

15           It is critical that NOSB review each new inert  
16 ingredient in pesticides for organic production separately.  
17 Such an individualized approach is mandated by OFBA's statutory  
18 and regulatory language.

19           So I urge that the Board move away from the question  
20 of whether inerts should be individually evaluated. They have  
21 to be under OFBA. Inert ingredients and pesticides for organic  
22 production must comply with all of OFBA's requirements for the  
23 National List. There must be a demonstrated need for each  
24 synthetic inert ingredient in organic pesticides in order for  
25 it to be used.

1           Such an individualized review is also necessary to  
2 provide full transparency so that growers, certifiers, and  
3 consumers will continue to have faith in organic integrity, and  
4 know what's being applied to their farms and their foods.  
5 Thank you for your time today.

6           CHAIR POWELL-PALM: Thank you very much for joining  
7 us and for your comments. Nate Lewis has a question for you.

8           BD. MEM. LEWIS: So I've asked this question a bunch  
9 of times today, but I appreciate your opinion around OFBA and  
10 the National List criteria meeting -- sort of requiring that  
11 individual listing. But my question relates to all the other  
12 classes of substances and lists that we reference on the  
13 National List. Does that imply those are not okay, or what's  
14 unique about inerts that requires them? I'm just trying to,  
15 like, get to the bottom of that.

16           MS. WU: Yeah. That I would say is -- I think it  
17 depends on the individual approaches to the adoption of the  
18 list, those referenced lists. And I can't say that I'm an  
19 expert on all of them. You know, I think there could be  
20 memorandums of understanding or other ways of establishing an  
21 individualized review or group reviews. But I think just to  
22 say, as long as it's on this list, without any specification of  
23 the Board having conducted some understanding of what that  
24 other list process entails, is insufficient, especially here.  
25 We're relating to inerts where I think there is a known

1 difference between the EPA's review versus OFBA's statutory  
2 mandate.

3 BD. MEM. LEWIS: That is super helpful. Thank you  
4 very much.

5 CHAIR POWELL-PALM: All right. We really appreciate  
6 your comments today. Thank you.

7 MS. WU: Thank you.

8 CHAIR POWELL-PALM: Next up we have Anais Beddard,  
9 followed by Gwendolyn Wyard, and then Jackie DeMinter.

10 MS. BEDDARD: All right. Hi. Thank you for  
11 pronouncing my name right. My name is Anais Beddard and I'm  
12 the second generation now running Lady Moon Farms. My parents  
13 founded the farm in the late '80s, and were part of the  
14 founding farmers of the modern organic movement in this  
15 country.

16 Our Pennsylvania farm was the seventh certified  
17 organic farm in the state. We grew over the years, alongside  
18 the industry, and now have nearly 3,000 acres, with farms in  
19 Florida and Georgia. We're a fully diversified farm, growing  
20 upwards of 40 different commodities, ranging from leafy greens,  
21 to lettuce, to tomatoes. And we've been committed to the  
22 organic program for over three decades.

23 We have believed deeply that program, while not  
24 perfect, was the gold standard for producing healthy food for  
25 our communities, while leaving the land better than how we

1 found it.

2           It is our belief that the organic program no longer  
3 is the gold standard. There have been many issues plaguing the  
4 program, but the one that we have seen significantly impact our  
5 business is the allowance of hydroponics into the program.

6           There have been a handful of certifiers who refuse to  
7 certify these operations. And we believe that this is not only  
8 right, but it is necessary. Improving soil health was written  
9 into the law, as it is integral to the organic system model.  
10 Lady Moon participated in that conversation when it happened  
11 back in the '80s. We do not need special circumstances to farm  
12 competitively, yet that is exactly what these farms are  
13 receiving.

14           The standards are not the same, the audits are not  
15 the same. The quality of the produce is not the same. The  
16 consumer deserves better, as many believe they're buying the  
17 gold standard in veg production when they buy the organic seal.

18           While we haven't thought that add-on labels are the  
19 best choice to differentiate in the marketplace, we are given  
20 no choice when the organic seal no longer fully represents what  
21 we do. Being one of the original certified organic farms in  
22 the country, it hurts to admit that the program has lost its  
23 way.

24           We believe programs like the Real Organic Project are  
25 necessary to provide transparency and integrity to the end



1 consumer. If we lose the consumer's trust, then we really have  
2 lost it all. With the allowance of varying types of production  
3 methods, it is critically important that we are all treated  
4 equally. There are already barriers in place for soil-grown  
5 food that are not in place for hydroponic.

6 I know the crop subcommittee discussed the use of  
7 plastic mulch in organic production, and I wanted to touch on  
8 our view with this tool. While we try to minimize our plastic  
9 use across the farm, the use of mulch is critical to successful  
10 production, particularly in Florida. There are many benefits  
11 with weed, fertility, all of that. But growing in southwest  
12 Florida means that we grow in incredibly sandy soil. If we did  
13 not use mulch, we would not be able to maintain our beds  
14 physically. One heavy rain of four inches and the entire bed  
15 would wash away, along with the fertility we laid out.

16 And it's not unusual to get this kind of rain in  
17 southwest Florida. In fact, it's quite frequent during the  
18 beginning of our season. And when you compare other  
19 operations, and you see the plastic used, the plastic laid out  
20 on the ground, the plastic buckets. I mean, there is ten-fold  
21 the amount of plastic than what is used on our soil operation.

22 Farmers were incredibly resilient, optimistic group  
23 of people. I think organic farmers more so. So I want to say  
24 that my perspective has changed completely running the farm,  
25 even having growing up on it, and I recognize the incredibly

1 hard work that this group does, showing up constantly. So I  
2 wanted to thank the NOSB for all of your dedication to the  
3 program as well.

4 CHAIR POWELL-PALM: Thank you for your comments. And  
5 as we give a shout out to every farmer, it is not light task to  
6 show up and make sure your voice heard. So thank you very much  
7 for the time to join us today.

8 We have a question for you from Jerry.

9 BD. MEM. D'AMORE: Yeah. The question would normally  
10 center around hydroponics specifically, but I don't think we  
11 need to do that. I would just ask you, do you not believe that  
12 the entire organic program is built around exceptions, and the  
13 maintaining, and scrutiny of those exceptions?

14 MR. BEDDARD: Yes and no. I would say the entire  
15 organic program starts with the soil and the ground beneath our  
16 feet. And that is built into every single thing we do. And I  
17 think with the addition of the exceptions, and this, and that,  
18 and you know -- the guy a few days -- he's talking about the  
19 transition period. Okay. So you're going to test cocoa quire  
20 while I'm going to test soil in the ground, that is not the  
21 same thing.

22 So I'm asking for an even playing field. We're  
23 already competing with other countries, where it's not, you  
24 know, level, and we've heard a lot about that today. And I  
25 think that there are plenty of exceptions but you can't lose

1 the original intent.

2 BD. MEM. D'AMORE: Okay. Just one last question,  
3 then. In the reading of OFBA and reviewing hydroponics and  
4 what they say at the end of that, and then reviewing plastic  
5 mulches and covers, the same reading is there, except -- not  
6 allowed, except for. So in your own description in Florida, in  
7 what you need, you are using an exception in order to succeed;  
8 is that okay to say?

9 MR. BEDDARD: Yes. I would say it's necessary.

10 BD. MEM. D'AMORE: Thanks. You know, I'm just  
11 looking for common ground. That's all I want. So thank you.

12 MR. BEDDARD: Well, I would ask this then. You know,  
13 where all of these hydroponic farms are, are they unable to  
14 farm the land where they are? Because I think that the answer  
15 probably is not the same.

16 BD. MEM. D'AMORE: Okay. Well, the answer to that  
17 might be --

18 CHAIR POWELL-PALM: I'm going to jump in here real  
19 quick just to keep it fair. Anais, I totally understand your  
20 question. We keep it to Board members asking the questions.  
21 But really appreciate you joining us today. I think that  
22 there's usually a consistent narrative with the criticism of  
23 hydroponic and I think you brought a really nuanced perspective  
24 so -- as an economic threat to your business. I'm hearing you.

25 Real quick, could you speak to what produce

1 categories or products in particular you have experienced the  
2 most competition from hydroponics on?

3 MR. BEDDARD: Definitely tomatoes. We also do a lot  
4 of lettuce, but we have found that the competition from field  
5 grown and hydroponic lettuce is different. Often the lettuce,  
6 hydroponic, as you know, much smaller, and it's going much more  
7 hyper local, whereas the hydroponic tomatoes are coming from  
8 much farther away, and flooding the market at a much lower rate  
9 than we can compete with.

10 CHAIR POWELL-PALM: Okay. That's really helpful.  
11 Mindee has a question for you.

12 VICE CHAIR JEFFERY: Thank you so much. I joke  
13 around sometimes that I'm the first generation in my family not  
14 raised on the farm, so I -- and I'm still mad. So thank you so  
15 much for staying there, and doing what you're doing. And as  
16 Board member, I don't know if I've ever experienced so much  
17 pain in the compromise as I do while we do this work. And for  
18 me, like something that really helps is that this is democracy.  
19 This is democracy in America.

20 And for me, it's one of the few places that I see in  
21 this country where someone like yourself could have direct  
22 agency in the narrative.

23 And I wonder if that helps you in how you look at  
24 participating in organic, and whether or not that helps you  
25 find your way to staying inside this community when you think

1 about your choice of moving forward.

2 MS. BEDDARD: You know, I would answer differently if  
3 it was six years ago, because I came to these meetings very  
4 regularly then, and I spoke. And I felt like the outcome  
5 wasn't heard by the farmers, who were out here doing the  
6 farming.

7 So I might be a little more jaded now, unfortunately.  
8 But at the end of the day, like I can say all I want about add-  
9 ons, but I at my skill need the USDA organic label. And that's  
10 just part of it. If I didn't need that anymore, I don't know  
11 that we would keep it. But I need it.

12 So I'm going to keep the USDA organic. And I'm going  
13 to continue to let our voices be heard as much as possible. I  
14 don't know that I have faith that it will change anything, but  
15 like you said, at least, you know, I can be heard, which is  
16 more than many other people.

17 VICE CHAIR JEFFERY: Well, I appreciate you showing  
18 up.

19 MS. BEDDARD: Thank you.

20 CHAIR POWELL-PALM: Yes. Please stay in touch.  
21 Please come to the next meeting. We really appreciate your  
22 voice?

23 MS. BEDDARD: Thank you, guys.

24 CHAIR POWELL-PALM: Next up, we have Gwendolyn Wyard,  
25 followed by Jackie DeMinter, and then Kim Dietz.

1 MS. WYARD: Okay. Sound check.

2 CHAIR POWELL-PALM: Sound check's good. We can't see  
3 your face yet.

4 MS. WYARD: You can't see my face?

5 CHAIR POWELL-PALM: No. Never mind. I've got you.

6 MS. WYARD: Okay. All right. Great. Great. Great.  
7 All right. Well, good afternoon, NOSB members, NOP staff, and  
8 everyone in the virtual gallery. My name is Gwendolyn Wyard,  
9 and I am a founding partner of the newest organic advising firm  
10 on the block, and the only one dedicated entirely to organic  
11 fraud prevention and supply chain integrity.

12 We are strengthening organic systems, and we are here  
13 to SOS your OSP to comply with SOE.

14 My business partner Kim Dietz is going to say more  
15 about our business in just a bit. But given all of the  
16 discussion around elevating organic, I thought I would start  
17 out with a few of my thoughts and how it relates to our  
18 decision to start this business. And for the record, my  
19 comments today are my own. I'm not representing any of our  
20 clients.

21 Next slide. Ladies and gentlemen, feast your eyes on  
22 the organic wheel of sustainability. I spearheaded the  
23 development of this wheel when I was at the Organic Trade  
24 Association, and it continues to live as a key visual aid to  
25 OTA's data driven communications tool kit on the benefits of

1 organic.

2           So Nate, if you were to ask me why organic is the  
3 answer, I would say it is not because of any one attribute,  
4 it's the sum of all of its parts. And it's unique, to Jerry's  
5 point on Tuesday, it is the only eco label in the marketplace  
6 that is federally defined, third-party certified, and enforced  
7 by a government agency. And it's backed by data.

8           Each attribute around this wheel connects to a  
9 requirement in the regulation that you can look up, and an  
10 associated practice that fulfills that requirement and an  
11 outcome that is supported by reputable science and data that  
12 can be found in the wheels corresponding reference guide, which  
13 is a living, breathing guide that we will continue to develop  
14 and grow over time.

15           SOS is passionate about organic, sum of all of its  
16 parts, and we created our business to help deliver the  
17 guarantee.

18           And so with that, I'll turn to the next slide. SOS  
19 strongly supports an update to NOP's residue testing program.  
20 The work is clearly an OFBA responsibility of the Board. It's  
21 timely for effective SOE implementation because it will  
22 strengthen testing. Not only is it a tool for detecting fraud,  
23 but for monitoring the effectiveness of fraud mitigation  
24 measures, and identifying high-risk crops.

25           So I have three important points that I want to end

1 on about updating the residue program. Number one, focus first  
2 on updating the guidance and instruction in the NOP handbook.  
3 You heard this on Tuesday. Substances, methods currently used,  
4 responding to results, labs, everything that will prove clarity  
5 and consistency in testing and response practices. That's the  
6 first stop.

7           Along these same lines, note that the guidance and  
8 instruction consistently referenced pesticide residue testing.  
9 But we know that it's more than pesticides. The preamble to  
10 the 2013 rule clarifies that testing includes GMOs,  
11 antibiotics, heavy metals, and other prohibited substances.

12           Finally, keep in mind that the updates to the program  
13 will serve certified operations just as much as the ACAs.  
14 Testing is a critical tool that certified operations currently  
15 use, and will use even more as an impactful part of their fraud  
16 mitigation plan and monitoring procedures.

17           Industry and labs look to this guidance and, as it  
18 stands, it's noticeably out of date. So thank you so much for  
19 your service. And turn to the next slide and I'm happy to  
20 answer any questions you might have.

21           CHAIR POWELL-PALM: All right. We really appreciate  
22 your comments and your good work. Questions from the Board.  
23 Jerry has a question for you.

24           BD. MEM. D'AMORE: Thank you. Good to see you there.

25           MS. WYARD: Hi, Jerry.



1           BD. MEM. D'AMORE: We've heard a lot in the last two  
2 days about SOE, and there's one piece of SOE that I haven't  
3 even heard the concept mentioned, which is in terms of  
4 protection, is randomness as a tool. How would your respond to  
5 randomness as a tool in identifying fraud?

6           MS. WYARD: Randomness as in terms of testing?

7           BD. MEM. D'AMORE: Okay. Right. In other words, as  
8 it was being discussed some time ago at the subcommittee,  
9 etcetera, you know, it's -- and as was put forward maybe a half  
10 dozen times in the last two days, you know, how do we stop  
11 these -- both bad actors? And there's one thing that I would  
12 be very, very strongly in favor of, which is recognizing that  
13 these folks are at least as smart as we are, and they're  
14 probably more nimble than we are. And if we take randomness as  
15 a central element of our detection and then future enforcement,  
16 then we would lose a lot.

17           MS. WYARD: Yeah. Absolutely. I think, you know,  
18 unannounced inspections, the SOE rule codifies the requirement  
19 for unannounced inspections. It's always been a practice, but  
20 there it is in the regulation, and I think that testing is the  
21 most impactful, the most effective part of unannounced  
22 inspections.

23           If you're going in and you're performing random  
24 testing, that's going to keep everybody on their toes. And I  
25 think, you know, that is why my comment about increased testing

1 from industry, and right now, I think industry is testing far  
2 above and beyond the five percent that certifiers are testing.  
3 That's good. They're doing it for their own business purposes,  
4 for the quality of their products. But as everybody is  
5 conducting their vulnerability assessments and putting their  
6 mitigation plans in place, and being prepared for their  
7 inspections, their annual on-sights, as well as their  
8 unannounced, they're going to start doing more of their own  
9 routine testing, right, to make sure that they're good in  
10 preparation for the unannounced inspection.

11           You know, we heard it earlier. Right now, you've got  
12 to make it difficult for the fraudsters, right? Fraudsters  
13 will go where it's easy. And so keeping everyone on their  
14 toes, making it hard, this concept of target hardening, right?  
15 So everybody comes together and they put up -- you know,  
16 everybody connects arms, and they make it very difficult for  
17 the fraudster to penetrate.

18           And so the more that the criminal behaviors -- the  
19 criminals are out there, hearing about the unannounced  
20 inspecting. That makes it difficult. So I think that  
21 randomness, and specifically testing attached to unannounced is  
22 really, really important.

23           BD. MEM. D'AMORE: Difficult and painful. Thank you.

24           MS. WYARD: Difficult and painful. Thanks, Jerry.

25 Nice to see you.

1 CHAIR POWELL-PALM: Amy, please go ahead.

2 BD. MEM. BRUCH: Gwendolyn, thanks for being here  
3 today. Thanks for focusing in on fraud prevention. I really  
4 appreciate it.

5 You mention and you kind of alluded to it just now  
6 through that comment, and then in your written comments about  
7 there's room to increase the testing from five percent. And  
8 since you're representing your own opinion today, I'd like to  
9 put you on the spot and ask, how far can we go up? We've heard  
10 from people that need to go 100 percent of imports. Where  
11 would you rank yourself on that scale?

12 MS. WYARD: Oh, boy. In terms of a number, I'm not  
13 sure. I think five percent is small. I will say that there  
14 are many certifiers that are above and beyond that five  
15 percent. So that's a little-known important fact, that it's  
16 not like everybody's holding right there at that five percent.  
17 Five percent is not enough. I think we could see it go up to  
18 ten percent. You know, again, we want to take -- you know,  
19 take -- even the full -- the amount that industry is also  
20 testing. But I think, you know, before we start increasing  
21 that percentage, again, back to the instruction, back to the  
22 handbook, we really need to look at where we're at right now,  
23 and do some improvements to make sure that the consistency, the  
24 response, and all of that is in place. There's a lot of  
25 training and educations that's needed before you start

1 increasing the amount of testing.

2           So you know, I don't want to put a number out. I  
3 just know that it can and should be increased. What we want to  
4 also avoid is making that become, you know, the answer, right.  
5 It's a tool. We want to make sure that it's a tool. I'm very  
6 much in support of organic certification as a process, but you  
7 have to use testing as a tool to understand how well that  
8 process is working.

9           So you don't want to go so high that it becomes a  
10 testing standard.

11           BD. MEM. BRUCH: Thank you.

12           CHAIR POWELL-PALM: Kim, please go ahead.

13           BD. MEM. HUSEMAN: Hi Gwendolyn. Appreciate your  
14 comments and congratulations on your business.

15           MS. WYARD: Thank you.

16           BD. MEM. HUSEMAN: My question -- it was mentioned  
17 earlier about a lot of the fraud that is detected is  
18 transmitted via the rumor mill. There's places to go to find  
19 it, but it's not maybe as transparent. Would you have any  
20 suggestions for how to increase the transparency when an entity  
21 is -- you know, when they are found to be committed a fraud?

22           MS. WYARD: How to commit the transparency to make it  
23 public information so people can go and look it up. I think  
24 there's -- is that -- am I understanding you correctly?

25           BD. MEM. HUSEMAN: Yes. But as a -- maybe more as a

1 stand-alone versus buried within another designed purpose.

2 MS. WYARD: Well, you know, I think this is  
3 important. It's a big part of the issue. I mean, even the  
4 amount of information that's available now, right, that you can  
5 go and look up. How many people know you can go and look up  
6 the most recent fraudulent certificates on the NOP website?

7 And a lot of times, by the time the information  
8 becomes publicly available, it's like years after. It's  
9 already gone through all of the -- everything. So you know, I  
10 think this is something that we're looking at as a business  
11 too. We think it's really important to help people report  
12 fraud, and for there to be some sort of an early detection,  
13 early form of communication so folks can know where to apply  
14 additional scrutiny and due diligence, right?

15 And it's tricky, though, because there's a lot of  
16 liability. There's a lot of responsibility. There's a lot of  
17 legalities. Everybody's a little spooked, a little bit scared  
18 of it.

19 So I think like anything else right now, we have to  
20 increase our communication. We have to increase our education  
21 about where you can go now to find out what is happening, where  
22 the fraud occurs, and then we can build on it from there. But  
23 I think it has to come from a private entity that holds a lot  
24 of that information. I think that's how we're going to get,  
25 you know, further faster. So that is certainly something that

1 we're looking at in terms of a core function of our business.

2 BD. MEM. HUSEMAN: Got you. Thanks so much.

3 MS. WYARD: You bet.

4 CHAIR POWELL-PALM: Kyla, please go ahead.

5 BD. MEM. SMITH: Hi Gwendolyn.

6 MS. WYARD: Hi Kyla.

7 BD. MEM. SMITH: So, you know, we've been hearing  
8 lots of comments about imports still being a real challenge.  
9 And so I've been getting, like, really jazzed up to do the  
10 supply chain audits. Surprisingly. Because I guess maybe it's  
11 like a little bit of both. Like a little bit of fear and  
12 excitement, but anyway.

13 I guess I'm just like -- I feel hopeful that we're  
14 going to -- like this is going to be a useful tool, and that we  
15 are going to get at something that certifiers haven't been able  
16 to get at before in a much more widespread way.

17 And so I guess I'm just like -- and then, you know, I  
18 did ask someone else about that, and like got a little bit shot  
19 down. And so from your perspective, do you think that's going  
20 to help and be this -- as useful as a tool as I think that it's  
21 going to be, or like, am I just like off in crazy town?

22 MS. WYARD: I do. I think that we are going to be  
23 shocked at the visibility that we're going to have, you know.  
24 And even in a year. And I can say this just even from the  
25 early start that we have in working with businesses that are

1 just getting certified for the first time, right, following in  
2 that -- the area of exemptions, the distributors, the brokers.  
3 Right there, right, the information that's going to start with  
4 the operations first doing their supply chain map, right, as  
5 part of their fraud prevention plan, as part of that  
6 vulnerability assessment, this certified operations -- new  
7 certified operations now in the fold, they are going to be  
8 doing supply chain mapping. And they're going to be putting  
9 information into the Organic Systems Plan that you probably  
10 have never seen before, right?

11 So right there, you're going to -- you know, landing  
12 on your desk, you're going to have increased visibility about  
13 where these products are coming from and where they're going.

14 And then U.S. certifiers are going to be working  
15 together to connect those dots, and to have that full chain  
16 visibility from farm to marketplace. And that is critical,  
17 right, to make it work. Because the certified operations,  
18 hopefully they will be doing more than just one up and one  
19 back, right, but that's the requirement right now as to the  
20 last certified entity.

21 But I think as this mapping happens, and as everybody  
22 is digging into their supply chain to figure out who's  
23 certified and who's not certified, who needs to get certified,  
24 what we're going to see, I think, surface in this next year as  
25 everybody is, you know, scrambling to meet this March 19th,

1 2024 date, just right there, there's going to be huge increased  
2 visibility.

3 I think the real challenge is going to be how to make  
4 the information work as fast as it needs to work, and not get  
5 bogged down, particularly as certifiers are communicating to  
6 each other, and how to, you know, connect all those dots.  
7 Because right now, the -- I'm not saying that people are using  
8 a paper file system, but in some ways, it's not far from that.

9 So you know, that central database, and figuring out  
10 the technology piece of it, funding into the integrity  
11 database, so important, growing that database, figuring out how  
12 to work that communication.

13 I feel hopeful, but it's going to take a lot of work.  
14 I'm glad you're hopeful.

15 CHAIR POWELL-PALM: Other questions for Gwen.

16 MS. WYARD: All right.

17 CHAIR POWELL-PALM: I don't think it's an  
18 understatement to just highlight how useful that sustainability  
19 wheel is as a visual communication aid. So thank you for  
20 helping develop that. I'm really glad it's out there to help  
21 everyone describe what organics is.

22 Could you, you know, ideate with me for a second on  
23 where and who you think are the best messengers for educating  
24 the world about what organic is?

25 MS. WYARD: Absolutely. Absolutely. The best



1 messenger -- I think -- I mean, Mike did a great job in saying  
2 we all play a part, right? It takes everyone. But I am a  
3 strong believer that it is at the point of sale that the  
4 shopper is going to be best educated. It is at that point of  
5 making a decision, and it's that point when they are reading,  
6 and looking, and deciding what to buy.

7           So I think that the champions in all of this are the  
8 retailers. I think it takes everybody to help get the  
9 information and the resources to support the retailers, but I  
10 think it is absolutely the retailers that are the champion.  
11 And I think that if we look. I mean, really, if you -- I know  
12 we've got to go, right. We're running out of time. But if you  
13 look at that wheel, the reason that wheel was created was to  
14 educate retailers, the large retailers, because we found when  
15 we went online, and all this -- you know, there's a handful  
16 that I -- to get people kind of in the mood, I'm going to say  
17 Amazon, Walmart, Kroger, right, large retailers that have  
18 sustainability programs, that have climate-friendly, climate  
19 pledge programs. And then they had these screening filters,  
20 where they would decide who would make it into that program  
21 that would get their stamp.

22           USDA organic is not making it. You can go on right  
23 now and look at the Built for Better program, good for the  
24 planet, good for the people, and through one large retailer  
25 that we know, and you will see 30-something seals,

1 certification seals, and USDA organic is not on there.

2 So it's kind of hard road -- if you've got some of  
3 the largest retailers and they're not accepting USDA organic as  
4 a certification that meets their sustainability and climate  
5 standards, and they're right -- putting information out on  
6 products and in stores to help shoppers, to help guide shoppers  
7 and their choices for purchases that support the environment,  
8 and USDA organic is not in there, that is a real problem.

9 So educating the retailers and getting information  
10 into those stores at the point of sale, I think that is really  
11 where it's at. That's my opinion.

12 CHAIR POWELL-PALM: So appreciate that. I love it.  
13 Yes. Thank you very much.

14 MS. WYARD: All right. Well, thank you, Nate. And  
15 thanks to everybody. I appreciate it. All right. Have a  
16 great afternoon and have a great meeting next week.

17 CHAIR POWELL-PALM: Thank you. Next up we have  
18 Jackie DeMinter, followed by Kim Dietz, and then Lily Hawkins.  
19 Jackie, the floor is yours.

20 MS. DEMINTER: Good afternoon. My name is Jackie  
21 DeMinter. I am the certification policy manager at MOSA  
22 Certified Organic.

23 Thank you for the opportunity to comment. We certify  
24 about 1,850 organic operations in the U.S. I'm commenting  
25 today primarily on geolocations and reducing regulatory burden,

1 which are tied together. Before I get to those, we have a  
2 request for the NOP regarding use of the organic integrity  
3 database certificate and addenda. Please provide guidance on  
4 future data requirements so we can effectively implement SOE.

5           It looks like the OID certificate only shows scopes,  
6 making an addendum with product details necessary. The addenda  
7 can be provided from the OID or not, though the information is  
8 still visible in the public search, MOSA intends to provide our  
9 clients with a more detailed product listing. If we provide  
10 this as an addendum, is it required to be made public. As to  
11 geolocations and regulatory burden, a blanket requirement to  
12 record geocodes for sites that already have a clear physical  
13 address would be an added burden.

14           If we were to find we couldn't locate an off-site  
15 field for an unannounced inspection without the client, a non-  
16 compliance can be issued and a GPS location gathered. For  
17 fields we identify as difficult to locate at the application  
18 stage, we could record the geocode when onsite. This minimizes  
19 the burden in collecting verifying and maintaining the  
20 information for all clients.

21           Recording GPS locations as a risk based best practice  
22 provides and sound and sensible path to increases compliance  
23 without excessive burden. We encourage NOSB to find creative  
24 ways to reduce any unnecessary burden for organic certifiers,  
25 as well as farmers and handlers, especially compliant, low-risk

1 operations. Increased oversight targeting high-risk operations  
2 also affects operations that have low to no risk to organic  
3 integrity when the same requirements are applied to everyone.

4 Let's focus our attention on impactful areas. We  
5 could increase residue testing for bulk imports as part of our  
6 current residue testing program without an added requirement  
7 for more residue tests overall. We have the ability to be more  
8 impactful by continuing to keep our efforts focused on  
9 livestock. So our eligibility compliant, additional  
10 requirements impact clients.

11 Inspections this year have effectively doubled in  
12 time and cost, with small dairies taking the biggest hit. It  
13 isn't feasible to continue to absorb additional inspection  
14 expenses, and we can't solve the inspector capacity issue  
15 without relieving pressure in other areas.

16 There's a strong second to Nicole Dehne's articulate  
17 comments and answers to the Board's questions. Thanks, Nicole.  
18 You said what we're thinking in such an effective way.

19 Thank you, NOSB, for the work you do.

20 CHAIR POWELL-PALM: Thank you very much for your  
21 comments. Questions from the Board? I just want to give MOSA  
22 a huge shoutout. You're doing a great job as a regional top  
23 lead. You're killing it. So thank you very much for all that  
24 work, and healthy farmers get organic.

25 All right. Next up we have Kim Dietz, followed by

1 Lily Hawkins, then Kate Mendenhall.

2 MS. DIETZ: Hi, everybody.

3 CHAIR POWELL-PALM: Hello.

4 MS. DIETZ: My name is Kim Dietz.

5 MS. ARSENAULT: Hey, Kim. Just me. Hang on one  
6 second so your slide's here. There we go. Thanks.

7 MS. DIETZ: Thank you. All right. My name is Kim  
8 Dietz, and I am the founding partner of Strengthening Organic  
9 Systems. For the record, today, I'm speaking on behalf of  
10 myself and not a paid advisor. I served on the NOSB from 2000  
11 to 2005 in the handlers. Chaired the materials committee and  
12 served as Board Secretary. So I deeply thank all of you for  
13 doing what you do. It takes a lot of dedication and service,  
14 and I do appreciate all of your time.

15 So a few fun facts related to what I'm going to talk  
16 about today. I had oversight of the very first certified  
17 organic facility in the United States, so in early 2000s, the  
18 company I worked for voluntarily certified as a handler  
19 facility. And I also was the very first company to create an  
20 organic flavor.

21 So topic of the day. After graduating law school in  
22 2019, I left a 30-year career with that original organic  
23 company and led the flavor division of an organic flavor  
24 division for one of the largest global flavor manufacturers.  
25 So quite a bit of extensive experience there.

1           Next slide, please. In June, Gwendolyn Wyard and I  
2 co-founded Strengthening Organic Systems. We are organic  
3 experts with 65 years of combined experience. So you see a  
4 little bit about us here on this screen.

5           Next slide. Today, I'd like to speak on nature  
6 flavors, Sunset, SOE implementation, and if I have time, a  
7 comment about the organic check off.

8           As I mentioned earlier, I developed and certified the  
9 very first certified organic flavor in 2002. At that time, my  
10 company made a business decision to only use organic flavors in  
11 all of their products, exclamation point. This ethical  
12 decision helps stimulate where we are today with thousands of  
13 organic flavors in the market. In 2015, Gwendolyn and I co-  
14 chaired the OTA organic flavors task force, and brought forward  
15 the petition to add the current annotation on commercial  
16 availability. My message to you today is that we need to  
17 continue with the current listing of natural flavors on the  
18 National List.

19           I would also like to say that the commercial  
20 availability clause is flawed and not working. I know the  
21 good, bad, and ugly of natural and organic flavors. Many  
22 companies are not following the intent of commercial  
23 availability, which was to require the use of organic flavors.

24           I urge the NOSB to endorse a working group or a task  
25 force bring me in again, bring forward recommendations on the

1 listing of natural flavors prior to the next Sunset. We have  
2 to move the needle again. I have many ideas and suggestions on  
3 the topic, so you can ask me about those anytime.

4 A little bit about the SOE rule, we are committed to  
5 doing that. I think it's important that we uphold consistent  
6 and enforceable procedures around SOE. So that is our goal.  
7 And check off, ask me if you want to know any more about that.

8 CHAIR POWELL-PALM: All right. I've got a question  
9 for you. Thank you, Kim, for your comments. We have a  
10 question for you, Amy Bruch.

11 BD. MEM. BRUCH: Hi, Kim. Thanks for joining us  
12 today, and thanks for your past service on the Board, and for  
13 the organic community.

14 I wanted to take your question about learning more  
15 about the check off. I'd love to hear your thought on that,  
16 please.

17 MS. DIETZ: Yeah. So I was actually quite amazed at  
18 the comments on Tuesday coming from folks. And I'm glad to  
19 hear that we're rekindling that topic again. In 2010, I  
20 chaired the OTA committee that worked to bring forward a  
21 national research and promotion program. So I just want to  
22 make sure people know that -- we've gone down this road before.  
23 We actually had a proposed rule that was taken off the table in  
24 2018. So there's been a lot of work in this area.

25 The program -- the intention of the program was to

1 bring about \$30 million to promotion at the time. So that was  
2 my comment. I mainly want to just remind everybody that we've  
3 done this. We've got -- I think there was about 12,000 public  
4 comments at the proposed rule before it came out. So we've got  
5 a lot of data. We've got a lot of research. We know what the  
6 consumer is looking for. We just have to get the message to  
7 them. And that was the main thing is that the consumers need  
8 to be educated about organic. They just have no idea and  
9 they're confused.

10 BD. MEM. BRUCH: Okay. Thank you, Kim. I know a lot  
11 of dollars are coming out of our paychecks for organic farmers  
12 for these check off programs, and our voices aren't being  
13 represented. Groups are taking the dollars. We can file  
14 exemptions, but yeah. That's helpful to learn. Thank you,  
15 Kim.

16 MS. DIETZ: Yes.

17 CHAIR POWELL-PALM: Please go ahead, Allison.

18 BD. MEM. JOHNSON: Thanks. Amy got my first  
19 question, but that means I've got to follow up. Thanks for  
20 being here, Kim.

21 My understanding is that some of the concerns around  
22 a check off were related to -- so the general corruption issues  
23 with the check off programs, and their history and also  
24 concerns about the scale of operations, and who would benefit  
25 most.



1           I think we've heard from a pretty wide range of  
2 operations. We're looking for some help with marketing, and so  
3 I'm curious if you have thoughts about how to address those  
4 concerns specifically.

5           MS. DIETZ: Yeah. I mean, it was a tough five years.  
6 You know, it was a very controversial topic. Not everybody  
7 likes check offs, and many of them have failed. But then  
8 there's been some very good ones like the Incredible Edible  
9 Egg, and the pistachio. But at the end of the day, you know,  
10 we need funding to get the marketing and the messaging out, and  
11 how are we going to do it?

12           We have been challenged as an industry. You know,  
13 we're 30 years old, and we still haven't got that message out  
14 in the right way. So we need something to work. It's not  
15 perfect, and it wasn't perfect, but we tried. So you know, I  
16 guess to answer your question, it's not going to please  
17 everybody, but you know, if this Board, and this -- and now is  
18 the time to do it again, we should try it.

19           CHAIR POWELL-PALM: Really appreciate both the  
20 historic work on that effort, Kim. I don't mean to minimize  
21 that for a minute. I realize there's a lot of folks who have  
22 been trying to figure this out for a long time.

23           MS. DIETZ: Yeah.

24           CHAIR POWELL-PALM: And it seems like -- you know, if  
25 it's not a check off, something to spread the good word about

1 organic. That's what we were hearing from producers. So  
2 putting it all out on the table. Thank you again for your  
3 comments. We really appreciate them.

4 MS. DIETZ: You're welcome.

5 CHAIR POWELL-PALM: Next up, we're going to have Lily  
6 Hawkins, followed by Kate Mendenhall, and then Erin Meschke.

7 Unfortunately, today folks, we are not going to get  
8 to the folks on the waitlist. I really appreciate everyone  
9 holding on with us. This has been one of the most fantastic  
10 meetings, tele-comments has just been great, really good  
11 conversations. But unfortunately, good conversations take  
12 time, and we are running out of it.

13 So we are going to move to Lily Hawkins, then Kate  
14 Mendenhall, and Erin Meschke. We're going to finish out the  
15 day with Sal Pinkham, Sam Welsh, Sara Neagu-Reed, and then Bob  
16 Quinn to close out the day.

17 Lily, the floor is yours.

18 MS. HAWKINS: Thank you. Hi everyone. My name's  
19 Lily Hawkins, and I'm speaking today on behalf of Organic  
20 Farmers Association. And I'd like to share comments on three  
21 topics. The first one will be quick. In regards to the work  
22 agenda request on biobased mulch film, I'd just like to share  
23 that this issue is consistently a fairly low priority for OFA  
24 farmer members. There is no biobased mulch film currently  
25 available that meets the standards. And we feel that this

1 issue has been adequately discussed and addressed.

2 So OFA urges the NOSB to prioritize the many other  
3 issues of more importance to organic growers. Thank you. And  
4 secondly, we would like to urge you to add organic swine  
5 management as an agenda topic. We are eagerly awaiting the  
6 publication of the final OLPS standard. And we would just like  
7 to mention that OLPS does lack detail when it comes to many  
8 areas of swine management that are typically covered in humane  
9 standards and in other national organic standards.

10 In order to expand the organic pork industry and to  
11 better serve consumers and producers of organic pork, more  
12 clarity is needed to promote animal welfare for swine on  
13 organic farms and to clearly communicate to consumers how  
14 organic pork is differentiated from other labels.

15 Since these issues have not been fully discussed with  
16 all stakeholders, we are hoping that the NOP and the NOSB will  
17 place this issue on the NOSB work agenda. And we'd like to  
18 mention that Milwaukee is a great location for convening  
19 organic swine producers, and an organic swine producer panel at  
20 the spring NOSB meeting would be a great start to addressing  
21 the issue. OFA would be happy to help you find producers for  
22 this panel if you should choose to go in that direction.

23 And then finally, another agenda item we would like  
24 to see added is Greenhouse and container production standards.  
25 OFA supports organic certification of crop production, where

1 typical terrestrial plants are grown to maturity in the ground  
2 with no barriers between the topsoil, subsoil, and bedrock.  
3 The plants must obtain the majority of their nutrients from  
4 that soil rather than from highly soluble fertilizers, and OFA  
5 opposes organic certification of hydroponic production and  
6 other production systems which do not meet the preceding  
7 requirement.

8           And we urge the NOP to revoke the organic  
9 certification of such operations. Current standards for the  
10 organic production of crops and containers in and outside of  
11 greenhouses are very limited, which has led to widespread  
12 certifier inconsistency in this area. As these production  
13 methods proliferate, strong standards are urgently needed to  
14 create a level playing field for organic producers and ensure  
15 that all certified organic production is climate smart.

16           We urge to you resume work on the agenda item, field  
17 and greenhouse container production. Thanks for your time and  
18 for the opportunity to comment. Look forward to seeing you all  
19 next week.

20           CHAIR POWELL-PALM: Thank you very much for your  
21 comments. Questions for Lily.

22           Thank you, Lily. I have a comment just to the group.  
23 For this idea of swine, I would really appreciate if we could  
24 get some more specifics. Right now, I see no market for swine.  
25 And so figuring out how do we get that pull would make me

1 create that demand. I'd be dying to know from everybody how we  
2 can make sure that -- if we're encouraging folks to transition,  
3 we have a market identified. So thank you for your comments.

4 CHAIR POWELL-PALM: Next up, Kate Mendenhall,  
5 followed by Erin Mischke, and then Sal Pinkham.

6 MS. MENDENHALL: Good afternoon, everyone. Thank  
7 you, NOSB members, for the opportunity to speak before you  
8 today. My name is Kate Mendenhall, I'm the executive director  
9 of the Organic Farmers Association.

10 OFA is a strong national voice, advocating for  
11 domestic certified organic farmers. Today, I will be  
12 addressing racial equity and strengthening organic enforcement.  
13 For racial equity, when OFA was founded, farmers wrote race and  
14 gender mattered as one of our guiding principles. OFA believes  
15 that the ways in which we work with each other and in  
16 organizations and movements, must reflect the values we hold  
17 for the world.

18 We also -- I'm sorry. We're hitting like right when  
19 the school bus is arriving. I'm sorry. All right. I'm just  
20 going too have to start over that sentence.

21 We also understand that the conditions that limit or  
22 support leadership, organizational and movement success are  
23 directly impacted by structural racism, sexism, and inequality.  
24 Thus, OFA is committed to addressing issues of race, gender,  
25 and equity in our work.

1           We ask that the NOSB and NOP also make this a  
2 priority by centering racial equity in the processes of the  
3 Board. The USDA's equity commission is impressive and provides  
4 recent recommendations that can guide how the Board embed  
5 racial equity into its processes, discussion documents, and  
6 public meetings. We hope to hear more about how the Board will  
7 specifically address work on racial equity in Milwaukee.

8           For strengthening organic enforcement implementation.  
9 OFA supports the SOE rule. However, we understood that its  
10 implementation would not impact fall to mid-size farmers,  
11 focusing rather on handlers, hirers, farms, and the import  
12 arena.

13           Regretfully, we have started to receive calls from  
14 small farmers directly impacted by SOE implementation. Farms  
15 are being asked to monitor and provide documentation, noting  
16 their sold organic product -- where their sold organic product  
17 goes after it leaves the farm gate, and how it's handled.

18           Record keeping requirements have increased to this  
19 effect as well. Farmers are concerned that they will: one,  
20 lose small markets who do not deal with this; and number two,  
21 be unfairly burdened by increased record keeping intended for  
22 higher risk operations.

23           We understand that certifiers are working to  
24 interpret and implement SOE with certified operators. While  
25 that's taking place, we strongly urge attention be paid to

1 paperwork burden and risk and SOE implementation, putting the  
2 increase in enforcement where it's most needed.

3 We also ask for consistency and SOE implementation  
4 among certifiers, and more guidance and clarity from the NOP,  
5 paying specific attention to shielding negative impact from  
6 small farms.

7 We should not lose small to mid-size farmers from the  
8 certification program because of SOE. OFA requests that you  
9 continue to work with NOP on this issue. And I was really  
10 pleased to hear some of the comments from DOF and MOSA about  
11 the same. I just think there's a lot to focus on and really  
12 protect small and mid-size farmers.

13 CHAIR POWELL-PALM: Thank you very much.

14 MS. MENDENHALL: Apologies. For the --

15 BD. MEM. TURNER: Do not apologize.

16 CHAIR POWELL-PALM: It is for them who we meet.  
17 Wood, please go ahead.

18 BD. MEM. TURNER: Nate I was just going to just jump  
19 in there and say, I love seeing your kids on the screen. And  
20 you know, this is -- to me, what Nate has said several times  
21 over the last couple of days about this virtual format, and  
22 giving people an opportunity to participate. I think it also  
23 extends beyond farmers to people who are able to work from home  
24 and raise their families while we're doing this work.

25 And I just think our grace in understanding that and

1 recognizing that is really, really important. So thank you  
2 very much and don't sweat it in the slightest. Thank you for  
3 your poise as you were going through that -- through your  
4 remarks.

5 MS. MENDENHALL: Perfect timing.

6 BD. MEM. SMITH: I'm going to jump in and just say --  
7 I was going to say nice recovery. And as tele-Board members  
8 know, my kids interrupt during Board calls all the time. Lots  
9 of visitors from my kids during Board calls.

10 MS. HAWKINS: Thank you for being so understanding.

11 CHAIR POWELL-PALM: Allison, please go ahead.

12 BD. MEM. JOHNSON: Thank you. Yeah. Echoing the  
13 appreciation for the best kind of Zoom bomber, and for your  
14 patience as we're running over time and bleeding into your  
15 evening.

16 I want to appreciate your comments on racial equity  
17 and just preview that we are trying to think about what we can  
18 bring forward in Milwaukee, especially looking at the Equity  
19 Commission's report, and anything you can do to keep the  
20 information flowing towards us from all of the outreach and  
21 work that you've been doing. We really appreciate it and need  
22 your insights.

23 I'm going to put you on the spot with a question  
24 about the checkoffs since it's been coming up and you are such  
25 a strong voice for small farmers. We've heard from a number of



1 folks over the last two days who are really looking for help  
2 marketing. And I'm curious if you have ideas in the cooker, or  
3 are interested in thinking through what that support could look  
4 like, whether it's a checkoff or some other options.

5 MS. MENDENHALL: Yeah. I mean, I do think that  
6 marketing is something that is needed. I'm really excited to  
7 see the organic marketing program come out on top. And then  
8 there's a farm bill -- marker bill focused on organic  
9 marketing. I think that's a great direction to go.

10 I just want to provide some caution to the avenue of  
11 an organic checkoff. One, because it was so divisive when it  
12 was attempted last, and really created a lot of distraction  
13 from positive organic methods, and things that we need to work  
14 on as an organic community. And secondly, what I heard from  
15 farmers across the country was that they have had many -- I'm  
16 sorry, just a second.

17 (Pause.)

18 MS. MENDENHALL: Sorry. So farmers have experienced  
19 just a lot of -- not a lot of benefit from checkoff programs  
20 historically, while industry -- industrial agriculture has  
21 really grown. So I just want to provide some caution.

22 And the organic community is so creative. So I think  
23 maybe using the things that are good about that concept of a  
24 checkoff, but creating a program that's going to be really  
25 healthy for the full spectrum of our organic community today

1 would be a more positive route to go down.

2 But you know, I think definitely marketing is a key  
3 priority.

4 CHAIR POWELL-PALM: Amy, please go ahead.

5 BD. MEM. BRUCH: Okay. Thanks, Nate. Thanks, Kate,  
6 for being here, impressive management of distraction. You're  
7 doing awesome. Quick clarifier and then I have a question.

8 But the clarifier, when you mentioned farmers and  
9 were such a basket of goods in the organic industry, are these  
10 grain farmers, primarily, when you say farmers? Are these  
11 fruit and veggies? Or what angle when you say farmers? Or  
12 maybe it's all of them -- all of the above.

13 MS. MENDENHALL: Are you talking about checkoff?

14 BD. MEM. BRUCH: For the checkoff, yeah. Just on  
15 your previous comments to Allison.

16 MS. MENDENHALL: Yeah. Well, you know, I live in  
17 northwest Iowa, and I can say I grew up during the farm crisis  
18 of the '80s, and there were loads of small pork producers. And  
19 the pork checkoff is one that just, like, brings tears to your  
20 eyes about how over the course of that checkoff program, we  
21 lost local auction opportunities, small farmers went out of  
22 business, and they attributed it to the pork checkoff in a  
23 large part. The market was really focused to a more industrial  
24 model. And that is the way that the market went.

25 They tried to overturn the checkoff, and it went all

1 the way to the Supreme Court, and they weren't able to do that.  
2 So that causes a lot of concern from that particular piece.

3 And then when I was talking to farmers, and at the  
4 time, I was at NOVA New York in New York State, and a lot of  
5 produce farmers were not really participating in checkoffs, but  
6 concerned with -- even if they were going to become exempt with  
7 the last proposal. The amount of paperwork they were going to  
8 have to do annually to prove that they were exempt.

9 And then you come up with the same problems about,  
10 well, how do you define net profit or gross income, when you  
11 have such big first commodities? You have organic dairy farms  
12 that have a really high gross low net. You have vegetable  
13 farms with, you know, sometimes the opposite problem. And so  
14 it's just really hard to make a rubber stamp checkoff program  
15 when -- with all of these commodities. Typically, it's one  
16 commodity, and farmers are farming in a very similar system.  
17 So there are just a lot of challenges to applying that model in  
18 -- for a full organic industry that we hadn't seen before. And  
19 I don't think it was really cracked correctly.

20 BD. MEM. BRUCH: Yeah. Okay. Thanks for that  
21 insight. Sorry, my real question -- this one's probably going  
22 to be quicker actually, your answer, just because appreciate  
23 forward. So I've seen in 2018 farm bill priorities captured  
24 this thing that was in your written comments, but we didn't get  
25 it over the finish line, and it was organic price elections for

1 storage loans offered by SFA, so that if we want a storage loan  
2 and we're not using conventional commodity prices, we're using  
3 the organic prices that RMA recognizes.

4 It didn't get over the finish line. What's the best  
5 method or avenue to position this? You had it in the crop  
6 insurance dialogue discussion, but I'm wondering is there a  
7 different avenue. Is it Farmville? Back to Farmville for  
8 that?

9 MS. MENDENHALL: I mean, I think there are some good  
10 crop insurance Farmville suggestions. We're going to be doing  
11 a lot more work over the next two years with farmer crop  
12 insurance, focus groups, to try and nail down the best farmer-  
13 driven solutions for some of these, as well -- and I really  
14 appreciate all the work that the NOSB is doing.

15 I'm probably not the best person to, like, directly  
16 answer your question, but I would be happy to ask the rest of  
17 my team and get back to you.

18 BD. MEM. BRUCH: Yeah. That sounds good, because I  
19 want to just nail placement so we can hopefully get that over  
20 the finish line.

21 MS. MENDENHALL: Okay. Thanks.

22 CHAIR POWELL-PALM: Kyla, please go ahead.

23 BD. MEM. SMITH: I'm breaking the no comments, just  
24 ask questions rule. So sorry. But anyway, I just wanted to  
25 make a comment just based -- to you and to, you know, the other

1 commenters who spoke about SOE's impact on small and mid-size  
2 farmers, and just wanted you to know that certifiers -- some  
3 certifiers spoke on that. I know PCO is taking that issue  
4 quite seriously as well.

5           And so work is being done. Certifiers are  
6 collaborating together through the ACA. We're not -- again,  
7 we're not going to get it perfect. And so I do appreciate,  
8 like, this getting raised up so that we can continue to, like,  
9 how would this be at the forefront, and try to find ways to  
10 navigate this. But -- and the NOP continues to drop trainings  
11 in the learning center. I haven't watched those all yet.

12           So anyway, I just want to recognize the comments and  
13 just say that things are moving along, and it sounds like we  
14 need to do a better job of working together because the message  
15 isn't staying consistent. And so I just appreciate that, and  
16 we can try to work through that with, you know, some future ACA  
17 working groups, so thanks.

18           MS. MENDENHALL: Can I just make a quick comment to  
19 that?

20           CHAIR POWELL-PALM: Very quick, please.

21           MS. MENDENHALL: Yeah. I would just say that we're  
22 already hearing -- we're getting calls from farmers who are  
23 hearing -- feeling the stress on that. So maybe there's, like,  
24 a little more dialogue maybe that we can also bring that  
25 feedback to ACS, the working group, so that just gets part of

1 the discussion. Thank you.

2 CHAIR POWELL-PALM: Thank you, Katie, for your  
3 comments. Thank you, Kyla.

4 Michelle, do we have Erin on the phone?

5 MS. ARSENAULT: It looks -- Erin's not with us, Nate.

6 CHAIR POWELL-PALM: Okay. We're going to jump to Sal  
7 Pinkham, then Sam Welsh, Sara Neagu-Reed, and I did say at the  
8 beginning I'm an equal opportunity butcher of names, so  
9 apologies if I get yours wrong, and then finish up with Bob  
10 Quinn. Sal, please go ahead.

11 MS. PINKHAM: Good afternoon. I'm Sal Pinkham,  
12 certification program manager at OEFFA. We certify about 1,100  
13 organic farmers and food processors in a 12-state region. I  
14 appreciate the opportunity to comment today on behalf of our  
15 certification program and our farmers, many of whom were unable  
16 to join this meeting due to harvest timing.

17 We were disappointed by some of the comments made to  
18 our farmers by the Board at the spring meeting. We hope that  
19 moving forward, the Board will treat public commenters with the  
20 same respect that you wish for yourselves.

21 Regarding tax topics. We appreciate the Board's  
22 elevation of organic as climate smart farming. We suggest  
23 ensuring that that NOSB research recommendations, always  
24 include direction USDA to study carbon sequestration and  
25 greenhouse gas emissions across a wide variety of organic and

1 conventional farming systems, conducting a panel discussion  
2 with soil health and climate scientists to inform the Board,  
3 and developing principles for the NOP to use in conversation  
4 with others at USDA to illustrate the multifaceted nature of  
5 the organic systems approach.

6 We thank the Board for delving into the critical  
7 topic of risk protection for organic farmers, and conducting  
8 such a comprehensive evaluation of the subject matter. This  
9 topic is too large to do justice in a three-minute comment, so  
10 I urge the Board to read OEFFA's written comment and  
11 recommendations in our crop insurance platform, which were  
12 developed by our farmers and addressed those subcommittees  
13 questions in detail.

14 Certifiers absolutely need to know the locations we  
15 certify. However, we offered a nuanced perspective on the  
16 spring discussion document that appears to have been foregone  
17 in this proposal, which we strongly oppose. This would be an  
18 unfunded mandate for certifiers, with neutral to negative  
19 effects on farmers. It will fall hardest on certifiers like  
20 OEFFA, who certify operations that do not use digital  
21 technology. And perhaps most crucially, it will not help us  
22 prevent fraud to support farmers or improve the most  
23 consequential inconsistencies among certifiers.

24 A fundamental inconsistency is the certification of  
25 hydroponic and aeroponic crops. We ask the Board to call for a

1 moratorium on the certification of new operations that grow  
2 crops to maturity in containers and to add field and greenhouse  
3 container production back to your work agenda.

4 We fully support broadening the net for residue  
5 testing to better encompass the entire global organic supply  
6 chain. Residue testing is costly and we would love guidance on  
7 how to use it most effectively. We support the proposed  
8 framework for evaluating residue testing with a few nuances  
9 mentioned in their written comments. And we suggest that NOP  
10 aggregate positive test results from certifiers and share that  
11 data with certifiers, so that we can continually adjust our  
12 sampling efforts to focus on areas of highest risk.

13 Finally, we appreciate the Board's interest in  
14 organic transition support. While a lot of the organic  
15 transition initiative has been less than ideal, but the  
16 program's objectives are extremely important. In future, we  
17 ask that the USDA develop such programs by first seeking  
18 partners among BIPOC organizations and those that are already  
19 doing the work so that resources can be used most effectively  
20 and support those who are most in need.

21 Thank you for your service to the organic community  
22 and for taking the time to listen to my comments.

23 CHAIR POWELL-PALM: Questions for Sal. Amy, please  
24 go ahead.

25 BD. MEM. BRUCH: Yeah. Sal, thank you so much for



1 joining us today and representing OEFFA and your members with  
2 your comments. I just -- maybe I didn't hear you correctly on  
3 the geocodes. I just wanted to understand -- or sorry,  
4 standardized location information, is the official name of that  
5 topic, the proposal. I just wanted to understand that better  
6 because there was effort to be made to encompass the feedback  
7 that we heard, especially from the plain's community about the  
8 parcel post and that that's kind of a common thing that, you  
9 know, folks are knowledgeable on and then legal addresses or  
10 street addresses that could lead to the geocodes. Is that  
11 helpful or is there something more that could be beneficial  
12 there?

13 MS. PINKHAM: Yeah. So first of all, thank you for  
14 incorporating that. I think Joel Kerts (ph.) was one of our  
15 members who spoke, and he had some really good feedback for  
16 you, and I know you listen to that.

17 BD. MEM. BRUCH: Awesome.

18 MS. PINKHAM: I will say, though, that -- the fact  
19 that some plain farmers are able to provide geocodes does not  
20 address the bigger problem, which is that not all of them can.  
21 And certifiers, such as OEFFA, are going to have place stuff on  
22 hundreds of operations, either at inspections or at review  
23 time, to try to get all of those entered into a consistent  
24 system.

25 The bigger problem with the current proposal is that

1 it's really focused on database consistency, and I'm a wonk. I  
2 like database consistency, but that by itself is not an  
3 important enough aim to increase the burden on small certifiers  
4 or small farmers. We need to focus on what it really  
5 accomplishes.

6 And the proposal in spring to have really specific  
7 geocodes, like the center of the field, would have had a slew  
8 of problems that you've avoided with the new proposal, but it's  
9 now broad enough that it won't have the benefits to fraud  
10 prevention that you're looking for. It's not going to help us  
11 with mass balance audits. It's not going to help us with  
12 traceability. It's not specific enough because it's not tied  
13 to crops being grown in those fields for us to do any useful  
14 analyses of the things that this would exist to be useful for.

15 Like the only benefit to the GPS pins that everything  
16 would be converted to under this current proposal is being sure  
17 that we can find everything for inspections. But that's  
18 already a requirement. We already can issue non-compliance if  
19 operations don't give us enough information. NOP can issue us  
20 a non-compliance if we're not collecting appropriate  
21 information. Does that make sense?

22 BD. MEM. BRUCH: Yeah. Thank you. I appreciate your  
23 additional information.

24 CHAIR POWELL-PALM: Carolyn, please go ahead.

25 BD. MEM. DIMITRI: So I just wanted to thank you and

1 your entire organization for all of that great information you  
2 provided on crop insurance. It really was extremely helpful to  
3 us in crafting that document. So thank you.

4 MS. PINKHAM: Well, thank you for all of your efforts  
5 on it. Your care and thoroughness really showed.

6 BD. MEM. DIMITRI: Yeah. Thank you.

7 CHAIR POWELL-PALM: All right. Thank you very much.

8 Next up we have Sam Welsh, followed by Sara Neagu-  
9 Reed, and then Bob Quinn finishing us out for the day.

10 Sam, the floor is yours. Good to see you.

11 MR. WELSH: Hi Nate and everyone. I'm Sam Welsh.  
12 I'm founder of One Cert and One Cert International. Together,  
13 we certify about 1,300 operations. OEFFA's first purpose is to  
14 establish national standards for organic products. And the  
15 second is to assure consumers that organic products meet a  
16 consistent standard.

17 OEFFA is unambiguous when it requires the OSP to  
18 include provisions that foster soil fertility, primarily  
19 through the management of the organic content of the soil.

20 Based on this requirement, the USDA organic  
21 regulations contain many specific requirements for soil and  
22 organic crop production. Unfortunately, the USDA does  
23 tremendous damage to organic integrity when it arbitrarily says  
24 that this requirement for soil is only applicable to operations  
25 that grow crops and soil. Such a disregard for its own

1 regulations damages organic integrity.

2           The regulations contain the word except 53 times.  
3 All exceptions must be in the regulations. Otherwise, the USDA  
4 fails to achieve the purposes of OEFFA. As the NOP works to  
5 implement the many good provisions in the SOE, they need to  
6 start with enforcing the law on the regulations as currently  
7 written.

8           The success and effectiveness of the SOE will be  
9 determined by how it is implemented. We've already heard many  
10 comments about the additional record keeping requirements for  
11 small farmers.

12           I want to contrast that with an example that reduces  
13 the paperwork burden for large exporters, importers, and their  
14 certifiers. The NOP import certificate would have been a great  
15 idea if implemented as a transaction certificate.  
16 Unfortunately, some certifiers successfully lobbied for a  
17 single import certificate to be valid for 12 to 18 months. It  
18 makes it virtually worthless for verification of the organic  
19 status of any single shipment. It's no better than what we  
20 currently have with annual certificates.

21           It also creates a competitive advantage for  
22 certifiers who choose to issue an import certificate that will  
23 be valid for a year or more. Obviously, their expenses will be  
24 much lower than those certifiers, like who cert who verify each  
25 shipment and issue import certificates for each of those

1 shipments.

2           Interestingly, hydroponic producers who are exporting  
3 to the U.S. are major beneficiary of import certificates that  
4 are valid for a year or more, instead of a certificate for each  
5 shipment. Issuing a 12-month certificate to organic grain or  
6 soybean meal exporters also fails to improve organic  
7 verification and integrity.

8           Maybe I spoke too fast. I think I'm done. What's  
9 that?

10           CHAIR POWELL-PALM: You did great. Questions from  
11 the Board?

12           All right, Sam. We really appreciate you joining us  
13 and for your time and expertise. Thank you. Next up is Sara  
14 Neagu-Reed, and please just correct me so I can learn how to  
15 say that right, and then Bob Quinn finishes up for the day.

16           MS. NEAGU-REED: No worries. It's Neagu. I tend to  
17 tell people to think of Ragu, the tomato sauce and that's how  
18 you can pronounce it.

19           CHAIR POWELL-PALM: You need to comment again just so  
20 I don't forget that and I get the chance to do it right next  
21 time.

22           MS. NEAGU-REED: Okay. And I'm not sure if Ragu  
23 sauce is organic, so maybe that's not the best reference point.  
24 But anyways, my name is Sara Neagu-Reed, and I serve as the  
25 director of production and environmental policy at the

1 International Fresh Produce Association.

2 I want to thank you for the opportunity to provide  
3 these remarks as the National Organic Standards Board conducts  
4 it sunset review of organic materials. My colleague, Emily  
5 Moyer, shared oral comments on behalf of IFPA Tuesday, and  
6 provided a brief overview of our organization. In the interest  
7 of time, my oral comments will solely focus on plastic mulch  
8 and covers.

9 IFPA supports the continued listing of plastic mulch  
10 and covers. The use of plastic mulch and covers are necessary  
11 to produce a wide variety of fresh organic produce because  
12 there's limited availability of alternative products providing  
13 the same production benefits. Plastic mulch and covers are  
14 used extensively to control weeds, conserve soil moisture,  
15 increase soil temperature, and improve crop yield and quality.

16 They also are readily available at a relatively low  
17 cost. This past August, IFPA conducted a survey of its members  
18 on the use of plastic mulch and covers in organic production.  
19 I want to provide you a summary of key findings of that survey.

20 First, 60 percent of large growers and 100 percent of  
21 small growers indicated that the primary reason they use  
22 plastic mulch in production is that it provides better weed  
23 control than other options. Growers also indicated that the  
24 product is more affordable, readily available, and easier to  
25 use than alternatives.

1           One hundred percent of large growers and 71 percent  
2 of small growers indicated that there would be additional labor  
3 costs and required resources if they were forced to implement  
4 and maintain alternative mulching methods.

5           Members noted that each of the alternatives were  
6 overwhelmingly deemed to be too expensive and difficult to  
7 implement. We recognize the subcommittees concerns related to  
8 the environmental impact of plastic mulch and covers.

9           However, given the necessity of these products and  
10 the lack of non-synthetic alternatives, the removal of plastic  
11 mulch from the National List would have extremely damaging  
12 impacts on growers yields and economic viability.

13           IFPA supports the continued use of objective science-  
14 based decision making as NOSB considered proposed changes to  
15 the full National List. We encourage the continued listing of  
16 plastic mulch and covers and other substances, as discussed in  
17 detail in our written comments.

18           And if interested, happy to also pass along the  
19 survey that I referenced early and we conducted in August on  
20 plastic mulch and covers. Thanks for the opportunity to  
21 present oral comments.

22           CHAIR POWELL-PALM: Thank you. We have a question  
23 for you from Jerry.

24           BD. MEM. D'AMORE: Thank you for your comments and a  
25 solid yes to wanting to have the surveys if you would, please.

1 And if I could summarize what you said and see if you agree  
2 with it, plastic mulch and covers do their job so well at such  
3 an effective price that they're indispensable. And that's part  
4 of the problem.

5 For me, the problem is they do do everything very,  
6 very well. And the -- it doesn't negate the need to address it  
7 and stay with it. And I would venture to say, listening to  
8 you, that there is going to be some time in the future where we  
9 can do -- we can have an equitable solution to that issue.

10 MS. NEAGU-REED: Yes, I agree.

11 BD. MEM. D'AMORE: Thank you.

12 CHAIR POWELL-PALM: Other questions for Sara. All  
13 right, Sara, we really appreciate you taking the time to speak  
14 with us today.

15 MS. NEAGU-REED: Thank you.

16 CHAIR POWELL-PALM: Last, but certainly not least, is  
17 going to be Bob Quinn. The floor is yours, sir. We've got you  
18 on mute still. We can hear you.

19 MR. QUINN: Okay. Great. Well, hello, folks. My  
20 name is Bob Quinn. You know, in 1986, I started -- I first  
21 experimented with regenerative organic systems on our farm in  
22 Montana, and I was so impressed that I converted my entire farm  
23 to organic in 1988.

24 I was an instant convert to regenerative organic  
25 agriculture and since then have promoted that system in



1 Montana, the United States, and throughout the world, and I  
2 served on the NOSB, its very first Board, in fact. So I know  
3 what you guys are going through and I appreciate very much your  
4 effort and your diligence and all you do.

5 Over the last 35 years, our organic market has gone  
6 from near zero to about six percent of the total national foods  
7 sold in America. At its current growth rate, we'll reach 100  
8 percent in the next 35 years. There are three areas that I  
9 would like you to help achieve this noble goal. They are  
10 marketing, country of origin labeling, and research.

11 First, more marketing of organic foods will help  
12 shoppers understand the investment they are making in improving  
13 their own health by buying nutrient-dense food, grown without  
14 poisonous chemical pesticides and healthy soils. The  
15 contribution they are making to help farmers and their workers  
16 have a fair return for their labor, reduction they are making  
17 to contamination of the earth and the mediation of climate  
18 change by increasing carbon sequestration, reduction of  
19 greenhouse gases from the production of nitrate fertilizer.

20 Let's help them understand the high cost of cheap  
21 food. If USDA can contribute \$15 million in marketing to a  
22 tiny hemp industry, surely the organic market, worth over \$60  
23 billion, is worthy of a similar amount or more. Even though  
24 six percent of the foods sold in America is organic, only about  
25 one percent of the farmers are currently organic. The

1 shortfall is end supply is being made up by cheap imports which  
2 are stealing markets from American farmers.

3 Shoppers could choose to support American farmers if  
4 they knew which products were from here. Why not give them an  
5 opportunity by promoting country of origin labeling. In the  
6 past few years of craziness when long supply chains failed to  
7 keep our store shelves stocked, I'm sure no one doubts the fact  
8 that a robust local and regional food supply is key to food  
9 security.

10 And finally research. Many of my neighbors are going  
11 broke, buying expensive chemical inputs. They are told they  
12 are necessary for high yields, that they must produce and pay  
13 for these inputs. Many would like to change, but don't know  
14 where to start.

15 Right now, 99 percent of the USDA research dollars  
16 are going into research chemical agriculture. A significant  
17 amount of that is focused on problems created by chemical  
18 agriculture itself, seeking chemical answers for chemical  
19 problems, like chemical-resistant weeds, chemical drifts,  
20 chemical contamination of our water and our soil, and even our  
21 rain. Why not divert some of that money to research organic  
22 systems.

23 I wonder if the same percent of money the USDA spends  
24 for organic research would be allocated as we see in the food  
25 market. That would increase the current research allowance of

1 one percent to nearly six percent of the total. Organic is the  
2 future, and I hope you can help me promote it in market, in  
3 country of origin and labeling, and in research. Thank you  
4 very much.

5 CHAIR POWELL-PALM: That's some good timing. One  
6 second to spare. Wood's got a question for you.

7 BD. MEM. TURNER: Bob, thanks for that. Thanks for  
8 your comments. You said something that really got my attention  
9 and I'm just curious. Have you ever had a conversation locally  
10 with your neighbors who are farming conventionally about the  
11 difference in your cost versus their costs? You mentioned  
12 they're going broke buying chemical inputs, and I just found  
13 that compelling because I feel like that's the opposite of  
14 sometimes what we hear.

15 MR. QUINN: Yes, I have. And you know what, the  
16 biggest challenge is, and many would like to have a different  
17 way of farming and really jump in for organic, but they don't  
18 know where to start. Their back's up against a wall  
19 financially in most cases. I mean, they're in debt clear up to  
20 their eyebrows. They're afraid of making a mistake. And  
21 that's why if we had research to help them with weed  
22 management, for example, that challenges many -- a lot of  
23 organic farmers, at least in the west and the upper great  
24 plains, if we had help with other -- with rotations and things  
25 that were really worth -- and successful for them. If they had

1 more help with counting extension, holding their hand, as it  
2 were, just to get them started, we would have a lot more  
3 interest and see a lot more jumping into organic, I believe.

4 CHAIR POWELL-PALM: Other questions for Bob? Well,  
5 Bob, I heard the call is we need to promote organic. We need  
6 to do some better research. And we need to give our neighbors  
7 and our domestic farmers a fair shake at these markets.

8 And then I think if we had one summary of the last  
9 two days, that might be just about as good as it gets. So  
10 really appreciate you hanging on all the way to the end with  
11 us. Thank you so much for the time to comment and take time  
12 out of your harvest. And thank you for your leadership and for  
13 making NOSB what we're all doing here today. So appreciate  
14 your service.

15 MR. QUINN: Thanks, guys. Keep up the good work. I  
16 really appreciate what you all do.

17 CHAIR POWELL-PALM: All right, everybody. That's a  
18 wrap for Fall 2023 public comments. We are going to be meeting  
19 next week in Rhode Island. Thank you everyone for all of the  
20 fantastic discussion, the great questions from the Board, and  
21 for sticking with us until the end.

22 We'll reconvene on October 24th in Providence, Rhode  
23 Island. And until then, be well. Thanks, everybody.

24 (Whereupon, at 6:01 p.m. the webinar 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 2023 ORFAL COMMENT WEBINARS

PLACE: Zoom for Government Webinar

DATE: October 19, 2023

was held according to the record, and that this is the  
original, complete, true and accurate transcript which has been  
compared to the recording accompli }.



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Elaine M. LaRosee,  
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2023 MEETING

Tuesday

October 24, 2023, 10:01 a.m., EST

Marriott Downtown Providence

1 Orms Street

Providence, Rhode Island 02904

National Organic Standards Board (NOSB) Members

Nate Powell-Palm, NOSB Chair

Mindee Jeffery, NOSB Vice Chair (absent)

Amy Bruch, NOSB Secretary

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

Allison Johnson

Kyla Smith

Nate Lewis

Dilip Nandwani

Logan Petrey

Franklin Quarcoo

Wood Turner

Javier Zamora (absent)

USDA/National Organic Program Staff

Dr. Jennifer Tucker, NOP Deputy Administrator

Michelle Arsenault, Advisory Committee Specialist

Jared Clark, National List Manager, Standards

Andrea Holm, Agricultural Marketing Specialist, Standards

Johanna Mirenda, Agricultural Marketing Specialist,  
Standards

Heather Kumar, NOSB Technical Support Staff

Esu Obu, NOSB Technical Support Staff

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1 PROCEEDINGS

2 (Time: 10:01 a.m.)

3 DR. TUCKER: Good morning, everyone. I am Jennifer  
4 Tucker, Deputy Administrator of the National Organic Program.  
5 Welcome to all our Board members, and our audience in the room  
6 and online. It is my honor to officially open the Fall 2023  
7 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.

14 For a little housekeeping, we are in a new space  
15 together. And so the restrooms are out and to the left. There  
16 are also a number of emergency exits on both ends of this hall.  
17 On this end of the hall, it's a one story down on the stairs  
18 and then out. On this end, if you turn right, there's another  
19 set of stairs that go down and then outside.

20 There will also be a photographer in the room. The  
21 Accredited Certifiers Association or ACA is celebrating its  
22 20th anniversary. Happy birthday, ACA, yay. And so a  
23 photographer is around to take some pictures to mark the event.  
24 This is a public meeting and so photography is allowed.

25 Next, we will take a look at the agenda. And I will



1 introduce members of the National Organic Program team. I'll  
2 then turn the floor to Nate Powell-Palm, board chair, for Board  
3 introductions.

4 So first the agenda. This morning will include  
5 introductions, some Board reports, and a program update with  
6 questions and answers with the Board. After lunch, we will  
7 hear from members of the Northeast Region of the Transition to  
8 Organic Partnership Program or TOPP. We will then start  
9 subcommittee work beginning with livestock. Tomorrow, we're  
10 going to hear from the Risk Management Agency as part of the  
11 CACS Committee's work. And then we'll continue subcommittee  
12 work through tomorrow. The work will continue into Thursday  
13 and then we will close with some Board business, including  
14 officer elections and a look ahead.

15 I want to close our segment by thanking the National  
16 Organic Program team. First, let's thank Michelle Arsenault,  
17 our advisory board specialist, who always provides exceptional  
18 support to the program and the Board.

19 (Applause.)

20 DR. TUCKER: We also have a number of other team  
21 members from Standards and from the broader NOP team here both  
22 to support the meeting and to learn. So please stand and wave  
23 when I call your name. From the Standards team, we have  
24 returning staff members Jared Clark, our National List manager;  
25 Andrea Holm, over there, there we go; and Joe Mirenda, where

1 are you, Joe, right up front there, okay. And then we also --  
2 so these folks you have already met are absolutely vital in  
3 advancing our work in both practice and National List  
4 standards.

5 We also have two new staff members in Standards,  
6 Heather Kumar and Esu Obu. Heather and Esu, do you want to  
7 stand up and just wave? Stand up, it's okay. Say hello. Yay.  
8 Okay.

9 (Applause.)

10 DR. TUCKER: So I wanted to introduce them, because  
11 Heather and Esu fill a vital new role with the program. This  
12 is a new role. They are scientific liaisons providing food  
13 technology expertise for the Board. They were hired as a  
14 direct outcome of this Board's recommendations related to human  
15 capital. We're really pleased to have them on board and in  
16 place for this meeting.

17 Also in the room are Penny Zuck, Alexis McNerney  
18 (ph.), and Rebecca Claypool (ph.) on my staff. Go ahead and  
19 stand up, guys. Yay. So they have played a key role in  
20 getting ready for this meeting. But I also want to highlight  
21 that all three are playing a critical role in managing the  
22 Transition to Organic Partnership Program or TOPP. They are  
23 working directly with the regions and with our national level  
24 cooperating group, and doing a lot of work and hard  
25 conversations behind the scenes. And that is vital work that

1 successfully goes with setting up a \$100 million program. They  
2 are also, just more personally, wonderful colleagues, who make  
3 every day a little easier and a lot more joyful. So I am very,  
4 very grateful to all three of them.

5 I want to mention two people who are not here in the  
6 room. So Standards Director Erin Healy had to stay home to  
7 recover from a very unfortunate shoulder injury. But she is  
8 listening online. Erin, thank you for everything you do to  
9 keep the many, many plates in Standards spinning and for  
10 getting our new team members hired and onboard so quickly and  
11 so well. So I had been a little pessimistic about the ability  
12 to have new people on board by the time we had this meeting and  
13 here they are right in the front row. So Erin did a really  
14 beautiful job with that hiring project.

15 I am also pleased to share that I have a new  
16 associate deputy administrator. As many of you know, the  
17 former associate, David Glasgow, got a terrific job back home  
18 in Tennessee and he left us this spring. Our new associate is  
19 Andrew Malone, who comes to us from the Department of the  
20 Treasury, where he served as the director of Alcohol Labeling  
21 and Formulation Division, in the Alcohol and Tobacco Tax and  
22 Trade Bureau. So that team reviews tens of thousands of labels  
23 for compliance each year, including those for organic alcohol,  
24 while also working through complex policy issues related to  
25 alcohol labeling. Andrew was previously with USDA over in

1 APHIS, Animal Plant Health Inspection Service, doing a lot of  
2 rulemaking work. Andrew has been on board for a couple of  
3 weeks. We are thrilled to have him part of the NOP.

4 Next, I turn the mike over to Nate Powell-Palm, our  
5 Board chair. Nate will be introducing Board members, all of  
6 whom devote hours and hours of volunteer time to serve the  
7 organic community. Let's give the full Board a big round of  
8 thanks and appreciation.

9 (Applause.)

10 DR. TUCKER: Nate, it is a true honor and privilege  
11 to sit beside you. So thank you for all your work in leading  
12 this Board and being such a strong community voice and member.  
13 So thank you.

14 CHAIR POWELL-PALM: Thank you very much, Jenny. I  
15 wanted to get started off with thanking everybody in the room.  
16 What a great looking crowd. You look sharp, folks. And  
17 everyone on line. Thank you for joining us and being here  
18 today. I'm really looking forward to this meeting.

19 Last night, I proposed at our admin meeting that we  
20 have a walk-on featuring music and really get it pumping in  
21 here. I was quickly shot down by everybody. So that will not  
22 be happening. But in its place, I hope we might be able to go  
23 around and just share who we are, how long we've been on the  
24 Board, and what we're looking forward to accomplishing in the  
25 next semester. Allison, would you kick us off, please?

1 BOARD MEMBER JOHNSON: I won't sing, I promise. Good  
2 morning, everyone. I'm Allison Johnson. I'm heading into my  
3 third year on the Board in the consumer public interest seat.  
4 I am a senior attorney with the Natural Resources Defense  
5 Council, as my other day job. And I'm really excited about all  
6 the work that's happening on transition to organic. So we have  
7 our part here to do with the CACS transition work item and I'm  
8 hoping that will help continue to feed the NOP's efforts to  
9 support transition. Really excited.

10 CHAIR POWELL-PALM: Thank you.

11 BOARD MEMBER CALDWELL: Brian Caldwell. This is my  
12 third year in the consumer and public interest chair. What I'm  
13 looking forward to mostly is just working with this incredible  
14 group of people. I have just been so pleased at the  
15 capabilities and the collegiality of this group. So that's --  
16 I think that's -- was I supposed to talk about something else?

17 CHAIR POWELL-PALM: No, that's great.

18 BOARD MEMBER CALDWELL: That's good enough. Okay.

19 CHAIR POWELL-PALM: That's great.

20 BOARD MEMBER CALDWELL: That's it then. Thank you.

21 BOARD MEMBER LEWIS: I'm Nate Lewis from Olympia,  
22 Washington. I work for the Washington Farmland Trust and I'm  
23 sitting the natural resource conservation seat. I think I'm  
24 most looking forward to working on the inerts issue and  
25 bringing that into the 21st century.

1           BOARD MEMBER NANDWANI: Good morning, all. My name  
2 is Dilip Nandwani. I work for Tennessee State University,  
3 based in Nashville, Tennessee. I'm on scientist seat and I am  
4 into end of my second year on the Board. I am very excited to  
5 meeting all of you in person. In fact, I had a little meeting  
6 on TOPP yesterday and this morning. And good to be here.  
7 Thank you.

8           BOARD MEMBER D'AMORE: Good morning, all. Gerry  
9 D'Amore from Monterey, California. I'm in the handler's seat.  
10 And I'm closing out my fourth year on the Board. I've -- this  
11 year I'm celebrating 50 years of being in the agricultural  
12 industry. The first 30 years were primarily as a  
13 producer/grower and in that capacity a good 20 years were  
14 owning, building, and operating a hydroponic farm in Virginia.  
15 And then the last 20 years I've migrated to post-harvest  
16 activity and go to market activity. I guess what I'd like to  
17 say is that it's just such a kick working with this Board. I  
18 think they are great. And for me I'm personally grateful that  
19 I've had an opportunity to close out my years with agriculture  
20 in this capacity. So thank you.

21           CHAIR POWELL-PALM: Thank you.

22           BOARD MEMBER SMITH: Hello? Does it work?

23           CHAIR POWELL-PALM: No.

24           BOARD MEMBER SMITH: You broke it. Okay? All right,  
25 my name is Kyla Smith. I am in the certifier seat. I work for

1 PCO. I'm their certification policy advisor. I am a little  
2 over halfway through my Board term. This is we're going into a  
3 year with no transition of Board members. And so we have --  
4 we'll see the same lovely faces all of next year. And I am  
5 excited that this group gets to -- we have some interesting  
6 agenda items with inerts and compost, and so I'm excited that,  
7 that we get to work on those together with like a solid Board  
8 who has gone through the onboarding and we don't have to tackle  
9 that as well. We also have annotations as a standing work  
10 agenda item, so hopefully we'll get to do a little bit of  
11 National List clean-up as well. Thanks.

12 SECRETARY BRUCH: Thank you. Oh, okay, that was good  
13 luck. Thank you, Kyla. All right. Good morning, everybody.  
14 Thank you so much for attending our meeting. I'm looking  
15 forward to this meeting to serve with my fellow Board members  
16 here. My name is Amy Bruch. I am a sixth generation farmer  
17 from Nebraska. I serve in the farmer's seat. I'm currently in  
18 my third year serving on the Board. And my background, I have  
19 40 percent of the experience Gerry has in Ag, so a couple of  
20 decades of experience. Half of that has been overseas working  
21 on projects. In Brazil, I lived there for six years. And I  
22 was in several countries, and Africa, as well, before returning  
23 home to my family farms. My dad unfortunately passed away too  
24 early in life, so I was able to carry on in his honor on my  
25 family farms and convert those to organic. We have about 2,700

1 acres of a gleam Ag land in Nebraska that we farm organically,  
2 row crops, small greens, etc. And let's see. I'm excited I  
3 guess for a lot of things going into this upcoming season with  
4 the Board. My primary focus has been dedication to the  
5 oversight to deter fraud series. Just with the stakeholder  
6 feedback that I've received, that's a very important area of  
7 opportunity. So that's where I like to dedicate my work on the  
8 Board. Thank you.

9 BOARD MEMBER HUSEMAN: You're going to go last, Nate?  
10 Okay. Good morning. Woke everybody up, I hope. I'm Kimberly  
11 Huseman. I sit in the handler's seat and I reside in Northern  
12 Colorado. I grew up production agriculture and in the organic  
13 space. I've been responsible for purchasing grains and oil  
14 seeds, and feed ingredients for livestock. I am so grateful  
15 for Heather and Esu to be joining our team this year to give  
16 the space and the time for this Board to be able to really hit  
17 some heavy topics. And I think this is a great season to be  
18 able to do that. I just want to shoutout to the two of you for  
19 being available for, for the Board.

20 BOARD MEMBER QUARCOO: Good morning. My name is  
21 Franklin Quarcoo. I'm an entomologist by training. I am a  
22 faculty member at Tuskegee University. I am on the  
23 environmental protection and natural resources conservation  
24 seat. This is my first year. I'm particularly interested in  
25 the work on, just as Nate said, on inerts and then also the



1 Transition to Organic Partnership Program this year. These are  
2 things that I am particularly interested in and happy about.  
3 Thank you.

4 BOARD MEMBER TURNER: Hi. I'm Wood Turner and one of  
5 the research conservation seats as well. I think you can blame  
6 me for the no -- the absence of the walk-on song, so apologies  
7 for that. I am head of ESG for Agriculture Capital based on  
8 San Francisco. We're a grower, packer, shipper of organic  
9 blueberries. And I'm at the end of my fourth year. I'm  
10 trained as an environmental planner and designer. I also am  
11 really fortunate to be able to start transitioning my family's  
12 farm in North Carolina. I moved. I left there 30 years ago.  
13 But I've now gotten an opportunity to help oversee the  
14 transition of that farm, so I'm really excited about that and  
15 excited about the relevance to what we're doing here on this  
16 Board. Kim, you stole my, my suggestion. I was going to  
17 celebrate Heather and Esu, as well. I'll do it again. I'm  
18 glad you're here. Thanks.

19 BOARD MEMBER PETREY: Good morning. I'm Logan  
20 Petrey. I work with Grimmway Farms, manage their southeast  
21 operation and organics there, mainly carrots, some veg, and  
22 some other crops. So I'm in the farmer's seat. I am on my  
23 third year. And I'm hoping by the end of my Board term, I'll  
24 be ready to serve the Board.

25 CHAIR POWELL-PALM: We unfortunately have a few

1 absences this meeting. Javier Zamora is absent. Mindee  
2 Jeffrey is here, but has come down sick. And so we're -- she's  
3 trying to figure out what the next step will be, if she's able  
4 to join us, but for now absent. And then Dr. Carolyn Dimitri  
5 is enroute. She had to teach a class last night, so she is  
6 hustling this way, but for now absent.

7           So to close out introductions, I'm Nate Powell-Palm.  
8 I'm a first generation farmer from Montana. I usually say  
9 Bozeman, but really I'm from Belgrade, which is sort of the  
10 other side of the tracks from what you might have seen in  
11 Yellowstone. And I, I have been certified organic since 2008.  
12 This is my fourth year on the Board. I was so elated to hear  
13 from all of the farmers, more farmers than I think NOSB has  
14 ever heard from this past public comment section, just to hear  
15 what their concerns are, how we are serving them, and how we  
16 can serve them better. And so I hope over this next semester  
17 we keep that engagement up and build on what we heard, allowing  
18 us to hopefully through TOPP deliver better results for our  
19 community as we grow this industry.

20           And with that, I'm going to hand it over to Madam  
21 Bruch, secretary of the NOSB.

22           SECRETARY BRUCH: Thank you, Nate, appreciate that.  
23 Fellow board members, so happy again to be with you in person,  
24 in Providence, Rhode Island. Before we jump into the minutes,  
25 I wanted to bring to light the state motto of Rhode Island.

1 Does anybody know? Oh, okay, in the back. Sorry, I can't do  
2 that. It's actually hope, which I thought was very fitting as  
3 we look and reflect on the organic program, where we've been,  
4 where we are, and where we're going. I just thought that that  
5 was really appropriate.

6 So now onto the minutes. You have received the  
7 minutes from our April 2023 meeting in Atlanta, Georgia. Does  
8 anybody have any corrections or additions to these minutes?  
9 Okay, they are approved as written. Thank you, Michelle, I  
10 appreciate that. And I'm handing it back over to Nate.

11 CHAIR POWELL-PALM: All right. And I have a few  
12 slides to share for my Chair's report. Testing -- no. All  
13 right, let's see. When I was 8 days old, a crop duster sprayed  
14 directly on my parents' rental house. What should have been  
15 scents of fresh cut hay or a newborn baby wafting through the  
16 window was replaced by a choking, sweet fume one hot day in  
17 July 1991. My mom had given birth to me in that home the week  
18 before, longing to raise children safely in the country. My  
19 dad, a 26-year old log home builder, whose only goal when  
20 starting a family was to provide and rent a home with a few  
21 acres from which he could run his business.

22 After my second birthday, my mom awoke one night to a  
23 rasping sound and it was me gasping for air. After the crop  
24 dusting, I had developed a shortness of breath. But one of  
25 those July nights and my parents were breaking every speed

1 limit to get to town some 20 miles away to get to a hospital.  
2 They rushed both to find relief for my contracted lungs, but  
3 also to understand why by simply living next to farmland they  
4 and the baby had been exposed to life-altering toxins.

5           Days after the crop dusting, the farmer who owned the  
6 property stopped by and told my parents that there was nothing  
7 to worry about, what was sprayed was harmless. And he  
8 represented a world outlook for many at the time that was  
9 normal.

10           After my second birthday, my asthma attacks became  
11 unrelenting. My mom's sole focus turned to finding a way to  
12 heal the damage that had been done. This dogged determination  
13 led to organic. She hunted for a sliver of a world free from  
14 pesticides and toxins, a refuge for her children, that would  
15 fight for and no matter what it took she would find it.

16           Before AFA and the National Organic Program, this  
17 meant hours of research, constantly interviewing grocery store  
18 employees, asking do you know what's in this, do you know where  
19 it's from. Before the USDA organic seal, my mom was a consumer  
20 who had to navigate a world of competing claims with no voice  
21 of authority on what the truth was about food, as she sought to  
22 heal me.

23           In Bozeman, before Bozeman was anything more than a  
24 cow town, we had a local employee-owned grocery store. Not a  
25 co-op or a natural food store, just a store where working

1 people bought there groceries at an affordable price. My mom  
2 searched for solutions to my asthma and to protect my siblings  
3 with clean food. She walked into this grocery store and asked  
4 if they could buy some organic baby food. The food buyer she  
5 remembers as being super kind, but earnestly saying I don't  
6 think anybody is going to buy that, so no, maybe she should try  
7 the health food store in the next town over.

8 My mom replied with me hanging on her hip, I need you  
9 to sell it to me. I shouldn't have to go to a health food  
10 store. I'm sure other moms in this town want it for their  
11 babies as well. And my mom knew that every mother will do what  
12 it takes to try to find food free from synthetic pesticides, if  
13 only given the chance.

14 The food buyer held out until my mom proposed that if  
15 they couldn't sell all of the organic baby food, then she would  
16 be on the hook and have to come up with a payment plan to buy  
17 it, herself. The buyer ordered six cases of Earth First  
18 organic baby food, four bags of organic carrots, and four bags  
19 of organic apples. He sold out of everything the same day the  
20 produce arrived.

21 Before the USDA seal, the sweet folks at the grocery  
22 store would roll their eyes every time they saw my mom and her  
23 gaggle of kids coming in, because they knew they would have to  
24 line up, and she would pluck everything off the shelf and ask  
25 where did this come from, what's in it, was it sprayed. She

1 was so grateful for every single thing she could buy that was  
2 certified organic when that green and white seal hit the  
3 shelves. Apples, carrots, and baby food were real staples in  
4 our house, because you could get them organic in our town.

5           When my parents purchased their 10 acres that I grow  
6 up on the rest of my childhood, they applied for organic  
7 certification. My mom and dad wanted to make a property as  
8 safe as possible for their kids. They looked to organic  
9 certification for clarity on what materials to use on their  
10 land, which to avoid, a roadmap for how to farm safely.

11           A few years ago, I found her application to OCIA,  
12 where she had earnestly tried to fill out an OSP. Little did  
13 she know how much that would become a part of her everyday with  
14 me.

15           Though my parents never received certification,  
16 because the most they ever grew was a large market garden, my  
17 mother's pleas were the pleas of every parent. We beg you,  
18 give us a path to protect our children. Organic gave them that  
19 path. And my mom looked to organic to heal my asthma. And it  
20 did.

21           I heard again on Tuesday the commenter from Iowa say  
22 her kids were made sick by glyphosate in their water. But she  
23 was able to heal them with organic food. She asked us to help  
24 educate about the benefits of organic to everyone. The organic  
25 seal has done measurable good to help young bodies grow up in

1 this country with fewer chemicals.

2 I'm not sure exactly when it was that I decided I  
3 wanted to be a farmer, but it likely started when my mom  
4 brought home some bum lambs -- brought home some bum lambs and  
5 by age 4, raising those bum lambs, I was hooked. From bottle  
6 lambs, to 4-H steers, to getting a loan to buy my own cows, I  
7 wanted to be a farmer with every fiber of my being. But also  
8 from an early age, I knew that I was gay. And in my perceived  
9 world, those two attributes would, would absolutely be  
10 incompatible. You can't be a gay farmer.

11 When I discovered certified organic for myself, I  
12 found a group of people who, for the past many decades had been  
13 building a world informed by the same truth as my mom. Each  
14 day they woke and went to their fields, turned to their  
15 kettles, or stocked their grocery shelves asking the question  
16 can you make a good living in agriculture while sparing the  
17 health of your family and the environment.

18 This past week, we heard public comments from the  
19 most farmers ever in the history of the NOSB, from Montana to  
20 Nebraska, from Texas to Vermont. They called out and said  
21 organic is the truth, organic is the future, please help us  
22 spread the word. They offered no call for exclusion. They  
23 said we are on the same team fighting for a future our kids can  
24 be proud of, a future where choosing between feeding our  
25 bellies and feeding the soil is a false choice. We know we can

1 do both and we do both without harming the environment.

2           In my world, a world of sweeping prairies and clear  
3 streamed mountains, organic is a big tent, a tent where folks  
4 search for more people to invite in. When at the age of 16 I  
5 asked may I join you in being certified organic, they all  
6 called back get in here. When I said but I only have 12 cows  
7 may I join your marketing co-op, they called back get in here.  
8 When I said I don't own land and probably never will, they  
9 called back get in here. When I said I wanted to raise grain,  
10 but could only raise 100 bushels, they called back get in here.  
11 When I asked if I could apprentice to be an inspector with  
12 Margaret Spawls (ph.), she called back get in here. And when I  
13 said to the organic community in the summer I want to marry the  
14 love of my life, who happens to be a man, they all called back  
15 can we come.

16           In the same way that organic is a refuge from  
17 environmental violence, freeing mothers to protect their  
18 children, organic has been a refuge from economic violence,  
19 freeing farmers to protect their community. And we must work  
20 to keep it so. When I grew up and before I discovered organic,  
21 I assumed that being a farmer was a labor of passion. You  
22 could only make a living, but not a good living. But after  
23 becoming an organic inspector in 2013, I began traveling the  
24 country.

25           And during my undergrad summers, I would plant my



1 crops, and walk on the plain, do inspections, come back, water  
2 my crops, and walk on the plain. And inspected farms from  
3 Oregon to North Carolina, from California to Minnesota. And  
4 what I saw was breathtaking. Organic was breathing new life  
5 into corners of the country written off as not being dairy land  
6 anymore, not being a place you grow vegetables for your  
7 community.

8           Organic offered a relief from get big or get out.  
9 Organic offered a relief for farmers who wanted to, like my  
10 dad, work a job where he could stay close to his family, where  
11 days are punctuated by a daughter learning to halter-break a  
12 calf, or a baby taking their first steps in the milking parlor.  
13 I inspected a new school seeking certification in Detroit,  
14 where mothers were trying to assemble land from vacant lots to  
15 farm organically. And they asked do not their children deserve  
16 the same refuge from toxins as every one else.

17           Traveling the country conducting over 3,000  
18 inspections, I heard one thing from all farmers, organic works.  
19 From my own family's experience and from the experience of  
20 thousands of consumers who drive and make the organic market  
21 possible every day, I heard organic works. And in October of  
22 2022, USDA said organic works, with the unprecedented and  
23 expertly executed rollout of the Transition to Organic  
24 Partnership Program or TOPP.

25           When Under Secretary Jenny Lester Moffitt called me

1 and asked if she could visit Montana and hear from our  
2 community, I said I'll have to check. When I called 60 of my  
3 farming colleagues to see if they could drive to Bozeman to  
4 speak with the under secretary, they said we'll be there. And  
5 when you invite 60 Montana farmers who are in the middle of  
6 harvest to a chance to build organic, make it bigger and make  
7 it better, they drop what they're doing and they drive, some  
8 over 8 hours for a chance to join this meeting.

9           When the under secretary pulled up to our fields, a  
10 rain we had been longing for brushed our heads but for a  
11 minute. And I remembered the fields on which the under  
12 secretary stood now as certified organic and teaming with life  
13 were the same fields sprayed near the house I was born in 30  
14 years ago.

15           In this time, the same time we all sit together  
16 striving for a better path forward in organic, I must also sit  
17 in awe of how far we have come. To have an organic farmer, one  
18 of our own, serve as under secretary, to have USDA listen do  
19 closely and support so effectively organizations who move the  
20 needle to help farmers, and to see with each field day  
21 mentorship and new market builds, my mom's struggle to realize  
22 a world safe for her children arrive.

23           Now let us go forth to make this true for every  
24 mother, everyone, everywhere. Let us go forth to make organic  
25 the norm, not the exception. Welcome to Fall 2023 NOSB.

1 Thank you.

2 (Applause.)

3 CHAIR POWELL-PALM: If everyone doesn't mind, let's  
4 take a little break, grab some coffee. Thank you.

5 (Off the record from 10:34 a.m. to 10:46 a.m.)

6 CHAIR POWELL-PALM: All right. We're going to jump  
7 next and I'm going to hand the mike over to Deputy  
8 Administrator Jenny Tucker.

9 DR. TUCKER: All right. Good morning, welcome back.  
10 All right, we are moving into the National Organic Program  
11 update, and questions and answers with the Board. So there  
12 should be some slides in there. Oh, I do that. There were  
13 are. So this is part 2 of our update. I do want to highlight  
14 that part 1 of our update is in the Organic Integrity Learning  
15 Center, that is a free learning resource where you can go and  
16 watch a presentation that is crowd sources from across NOP  
17 staff. It covers our TOPP update, updates through each of our  
18 different groups, provides kind of a real-time look. So if you  
19 log into the learning center, you can get to it under a course  
20 called NOP presentations. We also sent an Insider, Organic  
21 Insider last week that had a direct link to the presentation  
22 for anyone who wants to catch up on all of our happenings.

23 I'm going to give an overview of some key items here  
24 today before I open it up for questions. So this is a picture  
25 of the National Organic Program as it stands in June 2023. We

1 brought everybody to Washington, D.C. for the first time  
2 post-pandemic. And it really is remarkable how much the team  
3 has grown. So we are right now at about 88 people. And so we  
4 had somebody new yesterday join, and so a sort of natural ebb  
5 and flow of personnel. But we're approximately 88 people. And  
6 those folks are distributed across five key groups.

7 I was asked last night by some board members to give  
8 a little bit more detail on where do all these people work and  
9 what do they do. So I'm going to spend a little bit of time on  
10 that here.

11 First, accreditation, and compliance, and enforcement  
12 have both literally doubled over the last four or five years.  
13 That's where we put a tremendous amount of resources that have  
14 come with our increased budget. So there are at any given  
15 time, there are about somewhere between 20 and 25 people in  
16 those two groups. And so accreditation is split between two  
17 groups of equal size of accreditation managers, who are the  
18 touchpoints with our certifiers, and an audit team that is  
19 literally on the road all the time. In fact, we've got a team  
20 over in India right now doing the second part of a month-long,  
21 month-long each, on the ground audits of our international  
22 certifier step.

23 In compliance and enforcement, that group is also  
24 split into two groups. One group is, well, we call them the  
25 operations team and they are responsible for processing

1 incoming complaints about, for example, farms that are selling  
2 as organic without certification. That still makes up more  
3 than half of the complaints coming into the program are  
4 uncertified operations selling as organic. So that team has  
5 gotten to the point where they can very quickly respond to find  
6 out, okay, are they certified maybe under a different name, or  
7 they're not certified, they need to get themselves certified or  
8 stop selling as organic.

9           The other half of that team is split between a  
10 livestock and enforcement compliance team and import oversight  
11 team. We are all concerned about imports and import oversight,  
12 and we have a whole team. We have devoted a lot of resources  
13 to that team. Aligning with that team is also our trade  
14 activities group, which is really all about the international  
15 world in organic.

16           And so half of the trade activities group, which is  
17 about 15 people now -- that group did not even exist 5 years  
18 ago, so they're around 15 people now. They include the folks  
19 who oversee our international trade arrangement, so equivalency  
20 recognition arrangements. And then the other half of them is  
21 responsible for all of the data work and systems work involved  
22 in import oversight and in maintaining the organic integrity  
23 database. I'll get more into what they've been doing recently  
24 in a couple of minutes here.

25           So, again, that team didn't even exist about 5 years

1 ago and it is now 15 people just to oversee sort of trade  
2 arrangements, and all the data and international oversight.  
3 They work very, very closely with the import oversight group  
4 within compliance and enforcement.

5           And then we have the Office of the Deputy  
6 Administrator, so that's the staff that kind of reports  
7 directly up through me. They are running the TOPP program, so  
8 Transition to Organic Partnership Program, as well as doing  
9 things like the Organic Insider and making sure that we're  
10 spending money, so the budget office. And also we have a  
11 customer service team that took in -- we literally get multiple  
12 calls a day from farmers who want to get certified, who have  
13 questions, or want to sort of talk through challenges. So we  
14 have a full customer service team to take those calls.

15           So it is a lovely group. About two-thirds of them  
16 actually are not in D.C. We have been able to recruit some  
17 real talent from the community based on our ability to hire  
18 remote staff. And so we now have folks literally across the  
19 country working for the National Organic Program.

20           Our goal areas are to grow and develop the organic  
21 sector, to develop and implement organic standards, and then we  
22 have to goals related to organic integrity, because there are  
23 really two big pieces of this. One is developing a strong  
24 oversight system. So global organic control systems have lots  
25 of different elements. And so one of our goals is to continue

1 to build those systems. And then our accompanying goal relates  
2 to protecting integrity through robust enforcement. And so we  
3 actively do strategic planning in the program. Everyone's  
4 performance plan in the program is linked up to these four goal  
5 areas.

6 So Transition to Organic Partnership Program, there  
7 was a lot of work and discussion on that, yesterday. But for  
8 folks who might be new to this realm here, this is a  
9 \$100 million initiative that has four key workstreams, being  
10 administered by regions across the United States. So we have  
11 farmer to farmer mentoring, technical assistance, community  
12 development, workforce development, and data and reporting.  
13 And I want to give just kind of a sneak peak as to some of the  
14 successes there.

15 In one year, so one year ago it was actually at this  
16 meeting where we really launched the very first iteration of  
17 the TOPP map that showed all the partners that were  
18 preliminarily being engaged in the program. There are now more  
19 than 180 partners across the country engaged at different  
20 levels. We have regional leads, six regional leads. We have  
21 core partners in each region who might own a full workstream or  
22 are responsible for a complete state.

23 And then we have project-based partners, folks who  
24 are organizing groups with meetings, or farm tours, or other  
25 group events that bring together folks from audiences that we

1 previously haven't talked to before, farmers that might be  
2 considering the organic option but never really had someone to  
3 talk to about it, to learn more about, okay, how do I find  
4 seeds, how do I approach this market, how do I -- how do I  
5 engage in this process, what can I grow with what under  
6 organic. These are real-life stories.

7           There have been more than 165 events in just 1 year.  
8 Again, we just launched this program a year ago. There have  
9 already been 165 events. And in our online application system,  
10 we've already gotten 80 formal applications to be mentors from  
11 the organic community, and more than 80 applications from  
12 transitional farmers with some real detail about what they need  
13 and what they are experiencing, what they want to grow, what  
14 their process of transition is right now.

15           And so all of this has been stood up by a network of  
16 partners in a very, very short time. Yesterday, I reported  
17 that we had through all of these events touched 1,100 people.  
18 I was gently reminded by my staff that I missed a one, it's  
19 actually 11,000. So that's over 1,000 people per month that  
20 have been touched through, through TOPP. So thank you. That  
21 extra one is important.

22           I wanted to highlight some other points that USDA is  
23 doing to support transition. First, another program under the  
24 organic transition initiative is the organic market development  
25 grants. There were a number of very strong proposals for that.



1 Those proposals are now being evaluated by those teams with  
2 awards coming.

3           The organic integrity database, this part of our kind  
4 of longer term infrastructure around transitional operations.  
5 You know transitional continues to be somewhat of -- we call it  
6 an extra regulatory sort of part of the program, because the  
7 regs actually don't say a whole lot about transition. They  
8 talk about prohibited substances. So we have issued a memo  
9 that talks about criteria that certifiers can use to report  
10 transition operations to the organic integrity database.

11           That is not publicly -- those are not publicly posted  
12 -- I don't think I did that. They are not publicly posted  
13 data, but they are a way for us to communicate with RMA, the  
14 risk management agency, about who is qualified. We have heard  
15 that is an issue, that transitional crop insurance have a bit  
16 of a problem with people being in that pre-regulatory phase  
17 where they have to demonstrate certain activities to RMA, but  
18 they are not actually under the certification banner. So this  
19 was a collaborative effort with RMA to find a solution to that.

20           Can we get the slides back up? Thank you. I  
21 appreciate that. And so that leads into the next bullet,  
22 coordinating with RMA on transitioning farmer insurance. That  
23 was raised to us as a real challenge. And so I think we are  
24 making progress on that. The transitional operation reporting  
25 was part of that equation that we can control.

1           We have also done live training for USDA teams on  
2 climate smart ag and transitional farmer training. So more  
3 than 120 folks have been part of those live training sessions.  
4 The Board had given very useful recommendations related to  
5 climate smart ag. We have translated that into a micro  
6 learning for the learning center that will be publicly  
7 available I think in the next couple of, of weeks. We also in  
8 the learning center have a micro learning on transitional, so  
9 tips for farmers. So this screenshot is from that, practices  
10 at a glance, to get people started. So that interactive  
11 module, the climate smart crops stuff will come out soon.

12           We also will be publishing I'm really hoping in the  
13 next month or so what we're calling a transitional --  
14 transitioning producer plan template. I'm calling it a  
15 pre-OSP. It's not quite an OSP, because people aren't  
16 certified yet. But it is a glimpse at what the practices are  
17 and what transitional farmers need to be thinking about when  
18 transitioning into organic.

19           So that has been a nice partnership with Accredited  
20 Certifiers Association, ACA. Again, happy birthday ACA. They  
21 have brought together a group. And that's been hard and I  
22 admire the work they've done on that, because it really goes --  
23 in any sort of policy area, it always comes down to an  
24 artifact. What's the thing that all of the values and  
25 different beliefs and different perspectives are focused on?

1 And in this case, naturally it is the OPS. So how do you view  
2 the OSP depends largely on how you view organic and the meaning  
3 that it brings to you and your own story that you're bringing  
4 to that interaction with what is ultimately a regulatory  
5 document. And it's amazing the meaning that gets embedded in  
6 these objects and artifacts. And so I genuinely appreciate  
7 everybody who has been part of that effort within, within ACA.

8           We have been spending a lot of time and focus in  
9 implementing the strengthening organic enforcement final rule.  
10 So for folks again who might be new to the conversation, people  
11 say, oh, everyone knows about that. But there are people who  
12 don't know about that and so we are talking about it at every  
13 opportunity. Strengthening organic enforcement is a final rule  
14 that was published in January 2023. It is a fundamental update  
15 of the organic regulations that is designed to reduce the  
16 number of uncertified entity, so increase the number of  
17 certified operations across the supply chain. Requires the use  
18 of electronic import certificates, strengthens recordkeeping,  
19 supply chain choice ability, and strengthens our oversight of  
20 accredited certifiers.

21           And so this rule came out of a lot of Board  
22 recommendations. It came from our observations and working in  
23 the -- in the program. And a lot of enforcement work over  
24 several years. It is also driven by provisions in the 2018  
25 Farm Bill. So when folks talk about the Farm Bill, it's

1 important. It's important. We're in Farm Bill season now.  
2 And so when you get sort of requests from the group that you're  
3 associated with for input to the Farm Bill, it matters. It  
4 counts. So the goal of the rule is to protect organic  
5 integrity and bolster consumer confidence in the USDA organic  
6 seal.

7           Here is a look at some of our implementation  
8 activity. We have been doing outreach to the regulated  
9 community, including part of the community that doesn't know it  
10 needs to be regulated yet. And so the good news is we're  
11 talking to people we've never talked to before. So we're  
12 getting calls from associations that we've never actually been  
13 contacted before saying can you come and give a webinar. We  
14 give a webinar and about two months later they call. We've got  
15 a lot of questions. Can you come back for another webinar?

16           And we're doing that. And so it has been a phased  
17 rollout here where our first focus was getting the word out  
18 about this rule, focusing on the need for certification and  
19 import certificates, just to get people's attention. We have  
20 done scores of webinars and meetings with different  
21 associations, different groups to tell them about the rule.  
22 And now we're doing follow-up now that they've actually really  
23 read the rule and have a lot of questions about how they  
24 approach it.

25           I was with an association just this past week where

1 we really talked about with members of the import community how  
2 do you talk to your certifiers about this, how do you talk to  
3 your exporters outside the United States. If you're bringing  
4 in importers, what can you do to protect the market. You  
5 choose who you buy from and how are -- what are you doing to  
6 protect the market, what are your obligations under SOE, and  
7 how are you going to approach that. And very thoughtful  
8 conversations that show that people are paying attention to  
9 this and that they are really working through what they need to  
10 think about with their supply chains to enhance those  
11 protections.

12 We've been doing outreach to certifiers through the  
13 Accredited Certifiers Association. They've had a number of lunch  
14 and learns that I think have been valuable for people having  
15 conversations about what this means and how to implement it,  
16 where can we find alignment and consistency across certifiers.

17 We have online resources in the form of what we call  
18 SOE primers, a good New England term there, primer. And we  
19 recently launched a, a learning center course on SOE. It was  
20 interesting. We did a series of internal brown-bags where we  
21 ran through the rule with our own staff. The learning center  
22 team was able to take some snippets of me talking to the staff,  
23 Sasha Strohm on our team, talking to staff about different  
24 parts of the rule.

25 And she's excerpted those in fairly digestible chunks

1 that sort of talk about not only what does the rule say, but  
2 why does it matter. Because why it matters, the why behind the  
3 rule helps point to how. And so we strongly encourage to  
4 listen to that because it gives the what we're really trying to  
5 do here is. And I think certifiers have reported that's  
6 helpful in understanding therefore what, what do I actually do  
7 or how do I implement that.

8 Rules are designed to tell you the why and the what.  
9 It is then up to the regulated community to figure out the how  
10 based on, you know, we affectionally refer to site-specific  
11 conditions. And that also means unique supply chains. And so  
12 the entire supply chain needs to figure out how does this rule  
13 apply to them. We explain in training in the rule, itself, why  
14 this matters and what we're trying to achieve.

15 So we've also been launching technology modules. Our  
16 first step was to launch what we call a trade partner module.  
17 This is a way to get our trade partners, so we're talking about  
18 folks who hold equivalency and recognition arrangements with  
19 us, examples are Canada, the EU, Japan, Korea, as examples, New  
20 Zealand, getting them set up in the organic integrity database.

21 They have their own section now of the organic  
22 integrity database. We're now referring to that broader module  
23 as global, that's the global integrity database. And it is  
24 through those modules that those government certifiers will  
25 report certified operations that are exporting to the United

1 States. A whole new level of visibility and to lists of  
2 certified operations in other government schemes that we've  
3 never had before.

4 That module is also the foundation that side by side  
5 with USDA certifiers will be issuing the import certificate.  
6 So the import certificate module within the organic integrity  
7 database that fulfills strengthening organic enforcement  
8 requirement is now live. Certifiers can go in and start  
9 generating certificates and, in fact, already are. So we gave  
10 certifiers a head-start on that so they could get in and play.  
11 They have already generated scores of certificates to sort of  
12 start practicing. They have been approached by members of  
13 trade saying we want to be early adopters of this.

14 And we're learning all sorts of things. Well, what  
15 do you mean by this rule. What do you mean by that field. And  
16 so if you are kind of wondering what certifiers are doing to  
17 get ready for this, ask them have they gone into the import  
18 certificate module. Have they tried to generate a certificate.  
19 This is particularly important if we have folks representing  
20 the export community in other countries. Ask how is your  
21 certifier getting ready for SOE. And if they haven't heard of  
22 it, I would like to know about that, okay?

23 So getting everybody on board now is the best  
24 onboarding for the rule when it becomes effective. The team  
25 got this module launched about six months before the rule is to

1 be implemented. So everybody has time to get in there, learn  
2 how to use the system, learn how to issue import certificates.  
3 We did that on purpose, because that March date next spring is  
4 a very, very important date.

5 We'll be issuing publicly an Organic Insider on the  
6 NOP import certificate module we're guessing in about a week or  
7 two. Again, we wanted to give certifiers a bit of a chance to  
8 kind of take a deep breath, this is real, I've got to go learn  
9 how to use this, they weren't kidding around with this. And  
10 for everyone listening, we're not kidding around with this,  
11 okay. So, please, when you see that Organic Insider, please,  
12 please take it seriously.

13 Just want to give a reminder of when I'm talking  
14 about global organic control systems what we're actually  
15 talking about there. We are talking about the standards, the  
16 rules, policy, this advisory board's input, community input,  
17 the accreditation oversight of third-party organic certifiers,  
18 the certifies who oversee organic farms and businesses, who do  
19 unannounced inspections, who collect samples for testing.

20 One important part, for example, of strengthening  
21 organic enforcement are provisions that give certifiers  
22 actually the ability to more easily exit a market. So if they  
23 do not have what we call administrative capacity, if they can't  
24 get into a country, for example, to do an unannounced  
25 inspection, they shouldn't be working there. And the rule



1 directs them to not work in places they can't do unannounced  
2 inspections. That's just an example of the types of things  
3 that SOE puts in place to tighten up these controls around the  
4 world.

5 Enforcement is an important part of the reflecting  
6 the actions that we're taking to protect compliant businesses.  
7 Trade systems, again a new group for us, uses data. It's  
8 amazing what we have been able to get access to in Customs and  
9 Border Protection systems. Some of the very dry bureaucratic  
10 work has been updating memorandum of understanding related to  
11 data sharing across federal agencies. And that has opened up a  
12 world of data that we did not have available even three or four  
13 years ago. It's really remarkable the collaboration with  
14 Customs and Border Protection, which was formalized in the 2018  
15 Farm Bill as vital to protecting imports. And they have just  
16 been a tremendous partner for us.

17 Our international trade arrangements facilitate  
18 global growth. But they are also intended to help protect the  
19 market, in order to maintain equivalency. It's not just about  
20 the standards. They don't have to be identical. They need to  
21 be equivalent. But it's not just about the standards. It's  
22 about the systems that we use respectively in our government to  
23 oversee the markets that, that we control. So very, very  
24 important, especially with the implementation of SOE.

25 I want to share some of the activities that are

1 ongoing in compliance and enforcement. Part of compliance is  
2 training, training and outreach to build capabilities. The  
3 team has put a number of courses in the organic integrity  
4 learning center that helps share information that community  
5 needs both certifiers and operations based on some of the  
6 challenges we've seen in the space. And so for example, our  
7 livestock team regularly posts a new course in advanced  
8 livestock oversight and it's based on some of the cases that we  
9 are seeing. And so that helps give certifiers kind of a leg up  
10 on how to implement the standards.

11 We have also done a number of those courses related  
12 to import oversight, supply chain traceability, quantitative  
13 methods. I don't think many inspectors getting into organic  
14 realized there was going to be quite so much math. And  
15 strengthening organic enforcement calls for a lot of math. It  
16 does also call for inspectors and certifiers to have the  
17 requisite training, experience, and expertise to be able to do  
18 some of those math problems. Very important in preventing  
19 fraud.

20 Surveillance. This has been a big focus for us as  
21 we've grown the team. A lot of our work now is on complex  
22 supply chain surveillance. So if we have credible concerns  
23 about a region, all of a sudden there has been a tremendous  
24 amount of growth in an area, let's say a certifier all of a  
25 sudden is doubling the number of certified operations in a

1 certain place, those are all indicators to us that, that we  
2 need to be getting ahead of the curve.

3           And we now have a team that is able to fairly quickly  
4 initiate supply chain surveillance. Their work will be much  
5 easier through SOE. So one of our key points with  
6 strengthening organic enforcement is the need for certification  
7 across the supply chain. So while I'm getting a lot of  
8 questions about exemptions of, well, I'm only doing this, do I  
9 really need to be certified, our primary answer is it benefits  
10 everyone, for everyone in the supply chain to get certified.  
11 It protects all of us. It protects all of us for the public  
12 and greater good, for everyone in every supply chain to get  
13 certified, whether you're required to or not.

14           So buyers, if you're out there listening, you can  
15 help us. You can help us by requiring that -- by getting  
16 certified, yourself, and requiring everybody in your supply  
17 chain to get certified. This will only work if we are all  
18 engaged in the process.

19           We have issued a number of certifier directives in  
20 markets that have been particularly risky. So those have  
21 called for advanced testing, advanced mass balance and  
22 traceability exercises. A recent one was on livestock  
23 compliance domestically, but we've also done overseas  
24 directives as well.

25           Operations and certifiers in fact can lose

1 certification or accreditation under the National Organic  
2 Program. There are also now new legal penalties covered by  
3 trademark protection. So this is an area where we've made  
4 significant progress with Customs and Border Protection. We  
5 have activated the USDA organic seal in Customs and Border  
6 Protection trademark systems. And they are actively holding  
7 product at the border that use -- to products that use the seal  
8 that don't have evidence of certification. And many of those  
9 shipments have been turned away. So many of those shipments  
10 have been turned away.

11 Customs and Border Protection have some special  
12 authorities with trademark and we are regularly getting calls,  
13 hey, got this box, got the seal, no evidence of certification,  
14 what do you want us to do. And often they hold those at the  
15 border, which actually costs money. So we have civil penalties  
16 from the program. But Customs and Border Protection also  
17 charges to hold product at the border while it is under  
18 investigation. And so there is a business cost of that. Our  
19 goal is to take the profit out of fraud, to make fraud really,  
20 really expensive. And some of the work that we're doing with  
21 Customs and Border Protection is doing just that.

22 And then finally we have seen cases where people are  
23 sentenced to prison time based on fraud. We work with a lot of  
24 agencies and having 88 people allows us to work more closely  
25 with representatives, for example, at the Office of Inspector

1 General, Customs and Border Protection. We had a staff member  
2 up at the Port of Baltimore last week multiple days taking  
3 samples as they are coming into, into port. That is extending  
4 to other ports as well. We have signed arrangements with other  
5 AMS programs to do sampling for us at ports they are already at  
6 for oversight. And then we do through our Office of Inspector  
7 General work with the Department of Justice in cases of  
8 criminal, criminal cases.

9 This is just a quick look at our complaints over the  
10 past year. Last year, fiscal year, the team closed almost 500  
11 cases. About a third of those cases were actually voluntary  
12 compliance. So for example the farms or businesses that are  
13 advertising as organic without certification, when they stop  
14 doing that and pay a civil penalty, that's considered voluntary  
15 compliance. So they've stopped, they are no longer marketing,  
16 and often will pay a civil penalty for having, having done so.

17 On the right, you see a look at the distribution  
18 between cases. So that's almost 500 complaints. But we also  
19 have more than last year 200 just inquiries. And I gave this  
20 example in the past, at past NOSB meetings that you can hear  
21 things differently depending on whether you read a question of  
22 is Farmer Bob certified versus is Farmer Bob certified. That  
23 one sounds like it's a complaint, one is simply a question, is  
24 Farmer Bob certified? And we have really, really worked with  
25 the team to triage in a way that we say handles easy things

1 fast. Easy thing should be easy. Whereas before we had our  
2 tiering system, it could take several weeks for us to actually  
3 look to see whether Farmer Bob was certified. I think that is  
4 one of the best improvements in that team over the past  
5 several, several years.

6 In FY 2023, we resolved more complaints than, than  
7 received. We are currently hovering at about 350 open cases,  
8 but more than 75 percent of our cases are now closed in 180  
9 days or less. And many of them are much, much faster than  
10 that. But when cases involve OIG, they can be open for months  
11 or even unfortunately a couple of years.

12 I want to remind the community how you can track  
13 progress on NOSB recommendations. Keep in mind that a lot of  
14 the things that I've just talked about today were borne from  
15 this group, the National Organic Standards Board. And so  
16 following along with where we are with their recommendations,  
17 we have institutionalized our communication on NOSB  
18 recommendations in a way we had not done before. And so we now  
19 do regular NOP updates for NOSB in the learning center. We've  
20 done that since spring 2020.

21 NOSB recommendation indices, this has been a tool  
22 online for a long, long time, but it seemed to have been a bit  
23 of a hidden -- a hidden gem. So we're trying to do a better  
24 job of getting the word out. We're also trying to do a better  
25 job of explaining in the indices when we close something, a

1 brief explanation of why. There are a number of times that are  
2 still open. But overall we have addressed over 90 percent of  
3 NOSB recommendations since the Board started its work. The  
4 number is about 85 percent for practice standards. It's higher  
5 for National List standards.

6 We also regularly report to the NOSB through member  
7 -- through memos. These are publicly posted, so they are memos  
8 from the deputy administrator to the Board. But they are  
9 available online. We expanded those memos. There used to just  
10 be a report out from the meeting. We have now added a separate  
11 section to that memo that talks about what our regulatory  
12 priorities are for the upcoming semester. So the Board has a  
13 work agenda. But this meeting -- this memo is also our way of  
14 communicating what our priorities are at the program level so  
15 people can keep a log, track log.

16 OMB regulatory agenda published every spring and fall  
17 is the definitive place where you go and learn about what the  
18 agency, and department, and government's regulatory priorities  
19 are. So those are the four tools that we have  
20 institutionalized for the last several years to continue to  
21 report on regulatory status and priorities for the upcoming  
22 semester.

23 I want to thank you all for being here. I want to  
24 thank the Board. I want to thank the NOP team. You guys are  
25 an amazing group. The work that we reported on today really

1 does take a group of very, very talented people that I feel  
2 very, very privileged to work with every day. So organic  
3 integrity from farm to table, consumers trust the organic  
4 label, that is our vision for the organization. With the  
5 challenges we have, it is a vision that we continue to work for  
6 and towards every day with the help of all of you in the room  
7 and listening. So thank you for being here. And I think we'll  
8 open up questions to the Board.

9 CHAIR POWELL-PALM: Thank you, Jenny. Thank you for  
10 that update. Questions from the Board for Jenny. This is my  
11 favorite part of the meeting. So Nate Lewis, kick us off.  
12 Thank you.

13 BOARD MEMBER LEWIS: Jenny, can you elaborate a  
14 little bit on how you anticipate SOE and its implementation  
15 will affect our equivalency arrangements with trading partners?

16 DR. TUCKER: Yeah, this is really, really important.  
17 So I think I mentioned briefly during the presentation, but  
18 just a good reminder of how this works. We have trade  
19 arrangements with other governments like Canada, like the EU,  
20 where we have agreed that our standards are not necessarily  
21 identical, but they are equivalent, that they achieve the same  
22 goal and have approximately the same kind of regulatory burden  
23 for fair and -- fair trading. And more importantly in my mind  
24 or just as importantly is the system, itself. And so how  
25 governments are overseeing, how they are doing all the work



1 we've talked about here and those control system points, how  
2 those governments are doing those.

3           With the publication of strengthening organic  
4 enforcement, we have started the conversation with other  
5 governments on how are we going to update our equivalency  
6 arrangements. And that may mean that those governments need to  
7 make some changes in order to remain equivalent with us. And  
8 so other governments tend to update their regulations, too.  
9 So, for example, many know that the EU, European Union,  
10 recently updated its regulations. And so we've already started  
11 that technical dialogue.

12           The dialogue with Canada has started through a series  
13 of supply chain traceability audits where we identify what some  
14 of the challenges are. The Canada arrangement was put in place  
15 in 2009. It's what's called kind of a global, a global  
16 arrangement, but it was before a lot of the challenges have  
17 emerged that we all are experiencing today, and so having  
18 honest conversations with the government there through the  
19 supply chain audits of where are we seeing collective risks,  
20 where are we seeing collective gaps.

21           Canada was an early adopter of the trade partner  
22 module. And so they were one of the first ones to get in there  
23 and put their certifiers within the system. And so I think  
24 they have shown enthusiasm for that process and for getting  
25 their folks on board.

1           We're having that conversation with every single  
2 trade, trade partner at this time. But I think there are going  
3 to be some difficult conversations ahead about we have been  
4 able to here in the United States put some real investments  
5 into organic protection and that, it kind of raises the bar on  
6 harmonized systems around the world.

7           CHAIR POWELL-PALM: Allison and then Brian.

8           BOARD MEMBER JOHNSON: Thank you, Jenny. I have a  
9 comment and a question for you. First, I just really wanted to  
10 show appreciation to you and your team for all the work you've  
11 done to bring TOPP to life and to coordinate with other arms of  
12 USDA to support organic and transitioning producers. You  
13 mentioned that its Farm Bill season. And I and many others in  
14 this room are spending a lot of our time trying to convince  
15 Congress to continue this support and to, to make sure that  
16 there is a future for what you've begun to build through the  
17 organic transition initiative.

18           So I'm really grateful for the statistics that you  
19 shared today and really encourage you to continue to bring that  
20 information forward to us so that we can use it in advocacy and  
21 show that there is a strong demand for the program, and that  
22 this is a way to build support, a path to organic core  
23 producers, and make organic food accessible to consumers across  
24 the country. So thank you for that.

25           The question, we received several comments

1 encouraging us to look to the USDA Equity Commission as a  
2 source of guidance on how we can build a more diverse and  
3 equitable and inclusive organic sector. So I wanted to get  
4 your perspective on how we as the Board can engage the Equity  
5 Commission and see if you think it might be possible to invite  
6 a commissioner to speak with us sometime in the future.

7 DR. TUCKER: Thank you. And thank you for the  
8 question. The TOPP program is just incredibly exciting. And  
9 we're going to be hearing from the northeast groups right after  
10 lunch. So make sure you're back from lunch in time, because  
11 they've got some pretty incredible stories to tell.

12 Let's talk about USDA Equity Commission. For folks  
13 who are not around this every day, I'm going to give a little  
14 bit of background here. It was put in place a couple of years  
15 ago. And it is -- its purpose is to make recommendations for  
16 enduring changes to USDA programs and policy that eliminate or  
17 mitigate barriers to inclusion or access, eliminate systemic  
18 discrimination, advance equity and justice, and provide  
19 meaningful processes for continuing oversight of civil rights  
20 issues. So that is what the group has been charged with.

21 This is a secretary level commission. They meet up  
22 to four times each year. And, in fact, they are meeting right  
23 now as we speak. So they are having a meeting concurrently  
24 with us. They gave its first report earlier this year, so  
25 February of 2023. It had 32 recommendations that related to

1 how programs and policies might be modified to reduce  
2 disparities and advance racial justice. And so lots of  
3 insights from that group that are already being carried through  
4 at the agency work.

5           So what happens is agencies across USDA, and there  
6 are a lot of us, gets a copy of those recommendations. And  
7 then we look at our programs and our services to determine what  
8 can we do both now and in the future. And so there have  
9 already been changes within AMS, so that's the broader  
10 Agricultural Marketing Service within which the National  
11 Organic Program is housed.

12           The regional food business centers program, so that  
13 was a program that was announced in May 2023. And so a large  
14 part of that program is designed to assist small and mid-sized  
15 producers in overcoming barriers, including communities that  
16 have not traditionally been part of USDA programs. There's  
17 also been a number of processing capacity grants, a number of  
18 other cooperative agreements and grants run out of our sister  
19 program, the transportation and marketing programs, that are  
20 bringing people to the -- to the party, to the table who have  
21 not been part of it before.

22           Those are real changes in a relatively short time of  
23 hearing from people who have not been part of the conversation  
24 before. TOPP is also a reflection of that -- of that work.  
25 Now the work on TOPP was starting kind of concurrently while

1 the Equity Commission was being developed. And I think we  
2 can't underestimate kind of the ripple effects up and down and  
3 all around of, of the work. And so I don't think this  
4 community is kind of sitting here waiting for, oh, wait, we've  
5 got to wait for the Equity Commission to tell us what to do.  
6 That is not how organic works.

7           Organic has been very, very proactive in engaging the  
8 tough conversations and taking actions related to DEIA. One of  
9 the national partners under TOPP, it's led by the Organic  
10 Farmers Association, is specifically charged with bringing  
11 together affinity groups and bringing folks to the TOPP  
12 conversation that perhaps have not been part of the  
13 conversation before.

14           So I think, though, the good work will continue into  
15 the long-term. I do want to kind of close that discussion by  
16 just reminding us all kind of what one thing I said during the  
17 spring meeting, this really does start with each of us, one  
18 conversation at a time, of reaching out to somebody we've not  
19 had a conversation with before, asking them about their  
20 experience. We heard Nate's really, really powerful story.  
21 And there were a lot of tears out in the hallway after Nate's  
22 story. Everyone has a story that they bring to this community.

23           And there are lots of stories from people who are not  
24 part of our community that we deserve to hear and want to hear,  
25 that we want those stories to be part of our collective story.

1 And that starts by asking somebody what their story is. And so  
2 that's a very personal step that can take real courage in  
3 picking up a phone or approaching somebody in the hall that  
4 you've never talked to before. And I encourage every single  
5 one of us to do that.

6 CHAIR POWELL-PALM: Brian, please go ahead.

7 BOARD MEMBER CALDWELL: Thanks, Jenny. And thanks  
8 very much for that last -- those last few words. I want to add  
9 my, my appreciation for the, the really good progress that you  
10 and your team are making on organic integrity. It's wonderful  
11 to hear.

12 I sit in the consumer and public interest chair. And  
13 every year for these meetings, twice a year for these meetings  
14 we get many hundreds of, of consumer -- written and oral  
15 comments from consumers. And this time we, we really got a lot  
16 about concern about toxics in plastics and hydroponics. And so  
17 I want to put this, this question to both you and also to our  
18 stakeholders. That is how can we move forward and respond  
19 positively and productively to these concerns about hydroponics  
20 and toxics in plastics?

21 DR. TUCKER: Okay. Thank you for the questions. And  
22 there are kind of multiple questions within that question. So  
23 let's start with -- let's start with plastics, because I know  
24 that has been a topic of significant public comment. It's been  
25 a topic that this Board has, has talked about.

1           I think zooming out just a bit, I think one of the  
2 benefits of the current food system transformation effort is it  
3 really is helping, I think, communities and consumers  
4 understand a little bit more about where their food comes from  
5 and how it is produced. And I think there is no denying  
6 there's a lot of plastic in agriculture. Right? And that's  
7 not just organic. That's all of agriculture.

8           And so I think organic is often -- I've sort of  
9 talked to, to new folks. Organization is often a very focal  
10 point because of its openness and transparency for a lot of  
11 these concerns to bubble up. So sometimes that can make it  
12 sound like it's an organic problem, when actually I want to  
13 just frame that this is a broader experience in agriculture,  
14 that there is a lot of plastic in agriculture and food, food  
15 production in general.

16           And so this group has taken on some of that, that  
17 work and that inquiry through your discussion on materials, but  
18 then also just in general in your conversations. So I think  
19 those are important conversations to have. We do have your  
20 National List of deliberation process. We have a number of  
21 existing constructs and policy steps within this body's work.  
22 And I think you guys have used, used those well.

23           On the topic of hydroponics, which is I tend to look  
24 at everything as kind of overlapping than Venn diagrams. So on  
25 the topic of hydroponics, which another area like a lot of -- a

1 lot of ag, there is a lot of plastic in that, that part of the  
2 sector. And then to broaden that out to containers more  
3 broadly and lots of questions about soil-base versus soilless  
4 production.

5 I do want to emphasize that that is a topic,  
6 containers, that we are very cognizant that that had a high  
7 place in the regulatory priorities conversation in 2022. So  
8 when we did our listening session in 2022, containers ranked  
9 right up there as a high priority, pretty close after the three  
10 big rules we call the triple crown, origin of livestock,  
11 strengthening organic enforcement, and organic livestock and  
12 poultry practice -- standards, sorry. Some of the acronyms are  
13 a lot even for me, right?

14 So we had origin of livestock, OOL; strengthening  
15 organic enforcement, SOE; and organic livestock and poultry  
16 standards, OLPS. Those rules, as well as advance rule writing  
17 related to the nitrogen recommendation that was made in a  
18 previous meeting, as well as National List work, those have  
19 been a real focal point for us.

20 We hear the community that containers remains a  
21 priority. We are talking with the administration about the  
22 best way to proceed with that conversation. We need to finish  
23 some of these rules. And we also need to make sure we get  
24 these rules effectively implemented. You know I spent some  
25 time on SOE and how to implement that. I also want to



1 emphasize implementation of origin of livestock. We've already  
2 done a comprehensive review across certifiers for their  
3 compliance and then by extension their operations compliance.  
4 That's part of our surveillance work this fall as part of the  
5 livestock program. And so each of these rules also needs  
6 implementation.

7           So we want to make sure that we're not just putting  
8 rules out in the world and saying good luck with that. We're  
9 putting out rules in the world and following through on  
10 implementation and compliance and enforcement. And so we would  
11 -- we would take the same very deliberative approach with  
12 containers in terms of if rulemaking were to proceed, we need  
13 to think about how best to move forward with that.

14           So is that the Board working on it again? A lot of  
15 work has already been done. Some have suggested that this  
16 advanced notice of proposed rulemaking that we've done with  
17 something like inerts has worked well in terms of gathering  
18 some feedback, which then may lead to Board work. So I think  
19 there are some questions in terms of what the policy process  
20 should be related to containers, but it is certainly still on  
21 our minds as an important priority for the community.

22           BOARD MEMBER CALDWELL: Great. Just to follow-up on  
23 the -- on the plastics, I wonder if, if we can target the, the  
24 known toxics in plastics perhaps with annotations, just off the  
25 top of my head disallowing the use of PFAS, or bisphenols, or

1 phthalates in the production of, of organically approved  
2 plastics, is that an avenue that we, we could take to -- it's a  
3 huge problem. Just plastic waste is a huge problem. But I'm,  
4 I'm wondering if we can just attack it on or try to get a  
5 toehold via method like that.

6 DR. TUCKER: Annotations are a really valuable tool.  
7 The National List, it is a living list. I think annotations  
8 can be a really valuable tool and that's part of your kind of  
9 established processes of the Board. My only kind of comment  
10 would be as you're working on annotations, do always have in  
11 the back of your mind what a certifier is going to have to do.  
12 And so annotations, it is another thing that certifiers have to  
13 check, so please just have their voices in your head when  
14 you're working on that so they can take annotations and  
15 effectively both implement and enforce them with, with  
16 operations. But annotations certainly are a tool in the  
17 organic toolbox for starting to address a very complex problem.

18 BOARD MEMBER CALDWELL: Thank you so much, Jen.

19 CHAIR POWELL-PALM: Amy, please go ahead.

20 SECRETARY BRUCH: Sure. Thanks, Nate. Thanks,  
21 Jenny, for your time. Really appreciate you and the tremendous  
22 efforts that are undergoing with TOPP and SOE implementation.  
23 They are very important to the future of organics. I just  
24 wanted to mention a message from the Heartland. Times are  
25 extremely tough in our area. Corn and soybean producers are

1 faced with severe price compression, and limited market options  
2 for their main crops and also their rotational crops.

3           We all -- we heard from a few public commenters, but  
4 I hear this often from fellow farmers and friends that many  
5 producers in corn and soy, organic corn and soy are actually  
6 taking acres out of production just due to these challenging  
7 times, or contemplating doing so. In general, I believe it's  
8 easier to retain organic producers, because they know what  
9 they're getting into, and expand on their operations than  
10 transition new growers, even though we do need new growers in  
11 our -- in our operations as well or in our country as well.  
12 Can you talk more about the concerns about bringing new organic  
13 famers into our challenging grain world while we're facing  
14 these, these challenging times right now?

15           DR. TUCKER: Thank you for the question. And I -- it  
16 really reflects that everything we've talked about this  
17 morning, it's all connected. Right? We are not going to --  
18 for, for TOPP to be successful, we also have to do all the  
19 enforcement activities and oversight activities we're talking  
20 about. It has to be a fair market for everyone to be able to  
21 compete successfully.

22           So lots of different elements of that. The import  
23 oversight program I think is making a difference. That we have  
24 seen very large shipments where buyers in the United States  
25 refuse them because we had done testing and they had done

1 testing, and it revealed the presence of substances that said  
2 that this is not organic. And they've turned that away. We  
3 hear from more and more buyers in the U.S. of livestock feed in  
4 particular. They really would like to buy this at home.

5 We are in a -- we are in a very difficult transition  
6 period where we're working to put even more practices in place  
7 to protect the market, to protect the integrity of the market,  
8 while also trying to attract new folks to the market. One of  
9 the national agreements that we have under TOPP is -- I  
10 mentioned the one with OFA, Organization Farmers Association.  
11 Another one is with the Organic Trade Association, partnering  
12 with Rodale on the demand side, on the buyer side, where they  
13 are hosting events that can help buyers in the U.S. explain  
14 buying to transitioning farmers and explain kind of what, what  
15 those contracts might look like, talk about market development,  
16 talk about how to approach market development. Those are also  
17 resources that will be available for existing farmers that we  
18 don't want to lose.

19 It is we need to work on all -- on all fronts in  
20 order to have people in the United States feel safe enough to  
21 take that -- to take that jump. And this is why our team  
22 buildup has primarily been in the accreditation, and  
23 compliance, and enforcement group. This is why SOE is so  
24 important. Because if there are certifiers that are overseeing  
25 exporters to the United States that are not doing their jobs,

1 we need -- we need SOE as a tool to hold them accountable.

2           So if, if NOP is, well, yeah, I do that in addition  
3 to doing all these other things and they aren't approaching it  
4 with the same -- the same rigor, they need to either change  
5 their degree of rigor or they need to exit the market. And it  
6 is only through that oversight and that protection that it will  
7 -- folks will feel truly safe to stay in the market here and,  
8 and join it. But all of these levers work together. It's all  
9 connected.

10           And for oversight, SOE, TOPP, strong clear standards,  
11 it is all part of an economic and sociological system that we  
12 have all chosen to be part of for very personal reasons. We  
13 are part of the system collectively that can make it better.

14           CHAIR POWELL-PALM: Kyla, please go ahead.

15           BOARD MEMBER SMITH: Hi, Jenny. So we heard several  
16 comments during the comment webinar really to imports and the  
17 challenges that the industry is still experiencing. And you  
18 shared a lot of great information today during your update, as  
19 well as the update that's in the learning center. So thank you  
20 so much for that, related to the testing that NOP is  
21 conducting. And you know as certifiers, we're required to  
22 disclose the results of the residue test that we take, if they  
23 are requested. Is there a similar mechanism or another way for  
24 the program to continue to be transparent on the testing and  
25 the results that is happening since imports continues to be

1 such a concern for stakeholders?

2 DR. TUCKER: Yeah, great question. We -- so sampling  
3 and testing is an important part of the program's oversight.  
4 And as a tool, actually, we're able to do a lot. We could  
5 always do sampling and testing. Now that we have Customs and  
6 Border Protection data, we have a sense of where to go to  
7 actually do the sampling and testing. So that is helping us in  
8 doing more, more targeted surveillance and, therefore, sampling  
9 and testing, because we actually know when these ships are  
10 going to arrive and what's on them, and we have the connections  
11 with CBP to do them.

12 Our annual enforcement report to Congress, I think,  
13 is a vehicle through which we can do more of this reporting.  
14 The Farm Bill had some very specific requirements for  
15 reporting, which helps to drive SOE, but also improve organic  
16 integrity database. I think along with that in our report, we  
17 do report the activities that we're doing.

18 There's always a little bit of a fine line between  
19 being open and transparent about what we're doing, because when  
20 you're open and transparent about what you're doing we let all  
21 of you know what we're doing, but we also let all the bad guys  
22 know what we are doing. And so there is a significant concern  
23 about what we call sources and methods where we don't  
24 necessarily want everybody to know who, you know, what we're  
25 doing or where we are.

1 I can tell you that when we went to India in the  
2 spring, we did a pretty broad testing program of that. And it  
3 led directly to non-compliances for certifiers on the ground.  
4 We have a team over there right now that's following up how did  
5 you implement those. And if these are open, non-compliances  
6 that have not been resolved, then our next step under the  
7 regulations is to move to a proposed suspension.

8 And so we -- I think the enforcement report is a good  
9 vehicle for us to talk more about what we're doing. We're also  
10 very, very sensitive about showing our hand too much.

11 BOARD MEMBER D'AMORE: I, too, would like to lend my  
12 voice to the -- to the praise of SOE and that's where I'd like  
13 to stay now for a second. During our public comment sessions  
14 last week, there must have been three dozen times where I sat  
15 back in my chair and said, boy, thank god we've got SOE. Can  
16 you imagine addressing this crowd if we didn't have SOE?

17 And so I think the comment that I would like to make  
18 to, to much of what was said and maybe almost redundant to some  
19 of what two of you have said is we're at a point in time and  
20 that point in time is, is -- we're in a lag time, I would call  
21 it. This is in motion. But for it to hit the ground and be  
22 meaningful to some of the questions that we're asking won't  
23 happen the second there was an SOE. It's going to happen in  
24 six months, better in a year, better in a year and a half.

25 So I, you know, that's just a comment. It's not a

1 judgment at all. But I tell you what, if we didn't have SOE as  
2 a talking point in the last, last week with those oral  
3 comments, I just don't know what we would have done. So thank  
4 you and, and I firmly believe that these concerns will, will  
5 diminish rapidly with time. And just hang onto your saddle  
6 right now. So thanks.

7 DR. TUCKER: I appreciate that. I'm going to do a  
8 quick follow-up comment. This is -- one of the things that  
9 would be -- we're really sensitive about exemptions, because we  
10 are getting a lot. I get -- because my name is on the rule,  
11 for more information contact. And it's unbelievable the number  
12 of emails that I get on this. And unfortunately a lot of those  
13 emailers said, well, I'm only doing this, that, and the other  
14 thing, so I don't really need to be certified, do I? And I  
15 find that alarming.

16 So I do want to -- because if we get to next sort of  
17 spring and summer, and, oh, well, I got myself exempt, then we  
18 didn't -- then all of this effort didn't have the impact that  
19 it could have. And so, again, I want to say to folks out in  
20 the community who are listening, this only works if we're all,  
21 all in. And so I know that there are going to be lots of folks  
22 looking for the loopholes. But this industry is worth  
23 protecting. And it only works if we're all, all in.

24 And so it will take time. And we've already had a  
25 lot of time for folks to learn about this rule and to start --



1 to start to get certified. So I, I do want to emphasize the  
2 importance of this. Take it seriously. I'm also getting the,  
3 well, this part of the rule is really hard. And did you really  
4 mean this?

5           The rule is hard where the risk is high. And if you  
6 read the rule carefully, the rule is hard where the risk is  
7 high, which means it's not supposed to be hard where the risk  
8 is low. And we want to read the rule in that -- in that  
9 context, which means small farmers out there should not  
10 actually be overly burdened by this rule. It is the middle of  
11 the supply chain. It's where those hand-offs are where it  
12 would be really easy for somebody to combine a non-organic load  
13 with an organic load.

14           And we're asking for physical signage to mark it to  
15 decrease that risk because you know what, that's a high risk  
16 point in the supply chain. It's going to take all of us  
17 looking at how to do this and not trying to find the easiest  
18 way out, but really protecting it for this to work into the  
19 long term.

20           BOARD MEMBER D'AMORE: Hi, Gerry, again. I'm sort of  
21 -- I just got an email, a text saying identify yourself,  
22 please. So anyway, that's why -- that's why Gerry again. I'm  
23 sort of laughing as you're talking on this last point. You're  
24 dealing with the segment of the supply chain that's not really  
25 used to having people tell them what to do. That's part of the

1 problem, if I may be so bold.

2           So there's one segment, though, Jenny, that I am  
3 still concerned about. It was the rash of phone calls two  
4 months ago from major retailers and then an even greater amount  
5 of phone calls from the, the growing portion of our business  
6 that was wondering will the supply chains be open and fluid  
7 during the harvest after the 9th -- after 20 -- after the end  
8 of March.

9           There is another group, though, and there's a lot of  
10 them that just don't know what they don't know. So what you've  
11 talked about are people that they do know and they're figuring  
12 out, yeah, they've got to comply. But I'm worried about the  
13 segment that is not the largest of the group, but maybe the  
14 most voluminous towards the end of that supply chain handling  
15 that is really clueless. That's the only -- that's my comment.  
16 Thank you.

17           DR. TUCKER: Appreciate that. I'm really hoping that  
18 the level of clueness -- cluelessness continues to drop every  
19 day. And I do know there are a number of folks out in the  
20 audience and I, I can see you out there, who are doing a lot of  
21 work and educating. So it starts, it might start with the  
22 people in this room. But the people in this room are often  
23 involved in longer supply chains. And there are people online  
24 listening to us. There will be a transcript here. People will  
25 post things on Linked In and such like that.

1 I think continuing in every single way possible to  
2 continue to push the word out, all of us need to be thinking  
3 throughout the supply chain of how do I -- how do I help the --  
4 I often talk to my team about you throw a stone in the -- in  
5 the lake, you never actually know where all those ripples are  
6 going to go. But be thoughtful in which stones you throw,  
7 where you throw them, and you'd be shocked what can happen.

8 And I do believe this is an example. There might be  
9 a lot of stones in this room that can actually have ripple  
10 effects way beyond what we all realize.

11 CHAIR POWELL-PALM: Other questions from the Board?  
12 Welcome, Carolyn. I'd like to mark Carolyn as present. Amy,  
13 please go ahead.

14 SECRETARY BRUCH: Thanks, Nate. Jenny, I appreciate  
15 learning about the on the ground testing you guys are doing at  
16 point of departure. I was wondering now it's even more  
17 difficult. We have a lot of geo-political challenges. There  
18 is wars breaking out. Some of the impacted countries are where  
19 we're receiving imports. And some of them are still countries  
20 of high risk that are faced with these geo-political  
21 challenges. Can you speak to the work that's being done to  
22 ensure integrity of imports through these additional challenges  
23 abroad?

24 DR. TUCKER: Yeah, it is scary times out there. We  
25 have already seen a number of certifiers working overseas exit,

1 some countries, where they no longer have the administrative  
2 capacity. I mentioned that as part of SOE. But it's already  
3 happening where certifiers have dropped out of particular  
4 countries. We do keep an eye on the number of certified  
5 operations in certain countries. There is also -- so under  
6 SOE, certifiers can only go places they can do unannounced  
7 inspections. So that's, that's important. And I think some of  
8 that is already happening now.

9 I think it's also kind of a fair question of what  
10 about NOP's oversight of the certifiers, right? So if you have  
11 certifiers that are working in countries that the State  
12 Department has said we can't travel to, what does that -- what  
13 does that mean in terms of our oversight of certifiers. And  
14 that is an active conversation that the team is kind of  
15 evaluating in terms of what is, you know, what are the  
16 regulatory constructs around limiting our administrative  
17 capacity to oversee certifiers operating in some of these  
18 places.

19 And what does that mean? So if you -- because this  
20 gets complicated really quickly and it's aptly vital to figure  
21 out. So we suspend a certifier because we can't oversee that  
22 certifier's work in Country X. Okay. Well, now the war ends  
23 and we can go back. What happens to all of those operations  
24 that were suspended because the certifier could no longer do  
25 business and no certifiers could do business. And now you've

1 got a lot of farmers who may have been perfectly playing by the  
2 rules and doing the best they could to contribute to this -- to  
3 this kind of global community, what do they do. Can they get  
4 reinstated and what does that -- and you have to reinstate the  
5 certifier.

6 So this gets really messy really quickly. And it's  
7 something that is actively on our kind of internal work agenda,  
8 questions we're trying to work our way through.

9 CHAIR POWELL-PALM: Did you have any questions,  
10 Carolyn?

11 BOARD MEMBER DIMITRI: I don't have any questions.  
12 But I, I do have a comment. This is the end of my third year  
13 on the Board and I always thought of myself as an extremely  
14 informed organic person in terms of consuming and researching,  
15 having spent a lot of years writing papers. And it's just I  
16 guess being on this Board and having these interactions with  
17 the program. Of course, Jenny and Michelle are like our  
18 primary voices. I realize it's so much more complicated than I  
19 ever anticipated. And it -- I just find that surprising. And  
20 so I guess I thank like my Board colleagues and the National  
21 Organic Program. It's like not perfect by any stretch of the  
22 imagination, but it's a thing.

23 DR. TUCKER: Carolyn, we're really, really happy that  
24 you are here and a part of that complex conversation.

25 CHAIR POWELL-PALM: Other questions from the Board?

1 I have a question for you, Jenny, that we did not actually talk  
2 about. But I was wondering if you might go back a few slides  
3 where we could talk about the crosswalk for Climate Smart. It  
4 was two or three back.

5 So could you tell us a little bit about what the  
6 Climate Smart crosswalk is? And I think it's one of the most  
7 exciting things to come out of our Board, when we had such a  
8 short period of time to make it known that organic should be  
9 considered Climate Smart we were able to get it done. And I  
10 would love to hear from you sort of how you've taken that  
11 proposal and been able to build something off it.

12 DR. TUCKER: This is an exciting project. And I, I  
13 think it really has shown sort of a lot of how this process  
14 works, when it works really, really well. So the Board had  
15 started with -- I think it's a letter, letter to the Secretary  
16 sort of outlining sort of observations of the Administration's  
17 engagement with, with climate change and sort of proposing a  
18 role for organic, and talking about the role of organic as part  
19 of that conversation.

20 That letter got circulated throughout USDA and  
21 ultimately turned into a work agenda for the Board to continue  
22 the dialogue on that. And there was a lot of great feedback  
23 that came from the community and public comments so that it did  
24 end up being a recommendation.

25 Our team, in listening at NOP and listening to all of

1 those conversations, and reviewing the Board's recommendations,  
2 proposals, and that letter, and all the public comments  
3 associated with that, they were able to develop a very nice  
4 piece that takes the different parts of the organic regulations  
5 and talks about what the possible offerings through, for  
6 example, NRCS, Natural Resources Conservation Service. So what  
7 are the different offerings that, that NRCS provides, for  
8 example, the EQIP program and things like that. So how it  
9 cross -- how the regulations support Climate Smart agriculture  
10 in a very real annotated way.

11           And so that ended up being a pdf document that has  
12 been shared with others in USDA and has been well received.  
13 We're translating that into an interactive module for the  
14 Organic Integrity Learning Center. You'll be able to go in  
15 there and kind of click on sort of different practices,  
16 different regulations to find out resources, for example, that  
17 NRCS may have to help you do this.

18           And part of the goal here was if you're an organic  
19 farmer that also wants to get other types of credits, for  
20 example, through a state program or wants to qualify for  
21 certain conservation benefits, for example. They can more  
22 easily see what parts of the organic system plan that cover  
23 these regulations might actually, here's the language you can  
24 take and use for, for example, applying for some type of  
25 program.

1           There's so much talk now also about regenerative.  
2     And I think this really helps kind of make the point that  
3     organic farmers are already, it's baked into the, the  
4     regulations. And so I think the crosswalk tries to make that  
5     more, more explicit. So coming soon to a learning center, free  
6     resource, sign up now, online, 24/7. We'll send out an Organic  
7     Insider.

8           CHAIR POWELL-PALM: Thank you for that. And I just  
9     want to say thank you for the quick work giving us that work  
10    agenda item and making that so timely. And I also wanted to  
11    say, thank Amy, the chair of CACS for doggedly spending many  
12    nights on the phone with me as I tried to pound it out and  
13    write it, and gave great inside and feedback. So thank you for  
14    your work on that as well. It's great to see this come to  
15    fruition.

16           Other questions from the Board? Well, folks we are  
17    just slaying it on the timing. I mean we're doing really well.  
18    So I would ask if it's all right with the team that we break  
19    for lunch now, still take the 1 1/2 hours, and I think our top  
20    presenters have been -- have given us the go ahead that they're  
21    all right to move the agenda up and we might be able to just  
22    finish the day early.

23           And so that would be coming back at about 1:30  
24    Eastern Time. Is that right, Michelle? Anything to add to  
25    that schedule-wise? All right. With that, let's adjourn for



1 lunch and we'll see you all back here in an hour and a half.

2 Thank you.

3 (Whereupon, at 12:01 p.m., a lunch recess was taken.)

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

2 (1:44 p.m.)

3 CHAIR POWELL-PALM: All right, welcome back again.  
4 I'm going to hand it over to Deputy Administrator Jenny Tucker.

5 DR. TUCKER: Welcome back, everybody. I hope you had  
6 a good lunch. We are now moving to the next part of our  
7 program, which is an update and presentation from the  
8 Transition to Organic Partnership Program, specifically the  
9 Northeast TOPP region. And so I'm going to introduce the first  
10 speaker here, Diana Kobus. And she'll introduce the rest of  
11 her team.

12 Before I turn it over, though, I wanted to just  
13 compliment this region. The New England Region, the Northeast  
14 Region has a whole lot of states in it and, in fact, includes  
15 all of New England, where we're all sitting right now, but then  
16 it also extends down to some states that don't see very much or  
17 haven't seen in the past very much organic. And that includes  
18 West Virginia and Virginia, and so it also -- it covers really  
19 the whole Chesapeake Bay area and all the way up to Maine.  
20 That's a pretty high lift.

21 There are lots of states in that region, a lot of  
22 diversity in farming practices, and demographics, and  
23 socioeconomics, and everything else. And so I was really,  
24 really privileged to join a very early bringing together of  
25 partners. It was snowing, as I recall, in New York. And I

1 think Diana set a real early tone of collaboration in that  
2 region. So, Diana, grateful to you and all the work in that  
3 --- in that region.

4 Let me tell you a little bit about Diana. She is the  
5 executive director of Pennsylvania Certified Organic, or PCO.  
6 PCO is the northeast regional lead for, for TOPP. And so Diana  
7 joined the PCO team as its executive director in the middle of  
8 2020. She has over a decade of nonprofit leadership  
9 experience, with a particular focus in the certification of  
10 people in environmental and public health professions. People  
11 have such interesting backgrounds in organic.

12 So Diana has a masters in environment science and  
13 management, with a study focus in organic from Duquesne  
14 University, Center for Environmental Research and Education.  
15 And she holds an undergraduate degree in English and  
16 communication studies from Carlow University. Before coming to  
17 PCO, she was the executive director of the Institute of  
18 Professional Environmental Practice. She did that for 12  
19 years, successfully facilitating a merger with another organic  
20 serving public health professions.

21 She also worked at Whole Foods Market in the early  
22 2000s, different locations around the country, which really  
23 moved her to find ways to educate the public about the  
24 standards and food labeling after interacting with a lot of  
25 curious customers. So again those really personal stories

1 about what brings us to organic.

2 She brings a strong passion for organic production  
3 and the critical impacts it has on human health and the  
4 environment. She was born and raised in Pittsburgh. And, in  
5 fact, our last in-person meeting before we all went online for  
6 the pandemic was in Pittsburgh. It was a delightful meeting.  
7 She is there helping to help farmers directly in her work at  
8 PCO. She finds great joy in collaborating with stakeholders to  
9 find innovative and generative new pathways towards a health  
10 future for all.

11 And so, Diana, thank you for being here, for all your  
12 work in the northeast.

13 (Applause.)

14 MS. KOBUS: Thank you, Dr. Tucker and the NOSB for  
15 the opportunity to share some of our accomplishments today.  
16 It's been a great honor for PCO to lead the Northeast  
17 Mid-Atlantic Region in the Transition to Organic Partnership  
18 Program, or TOPP as we all call it. I'm very happy to say it  
19 has been a pleasure to get to know this group of already strong  
20 leaders and the impactful work of their organizations in the  
21 northeast as we've taken up this work together in the region.

22 I worked in this sector for only a little over two  
23 years before we became involved in this project. And as I have  
24 said to many of you, I cannot fathom any segment of industry  
25 that could have pulled together and coordinated an effort of

1 this magnitude other than the organic community. The history  
2 of cooperation and interdependence shows through in every  
3 meeting, every interaction we have with each other. The spirit  
4 of teamwork in this group is truly an incredible thing. And I  
5 want to thank the other partners, the leads, and the NOP staff  
6 for their continuing support.

7           The Northeast Mid-Atlantic Region is home to many  
8 prominent leaders and influential founders in the organic  
9 sector, as well as areas where organic markets have yet to be  
10 developed. PCO's approach to this region's TOPP work has been  
11 very intentional and that we aim to leverage this network of  
12 leaders in partnership, rather than attempt to lead alone.

13           In addition to PCO's regional lead, we have nine core  
14 partners in this region, that includes 13 states and the  
15 District of Colombia, the highest number of states of any TOPP  
16 region. The northeast TOPP region is also home to a large  
17 number of founding and successful USDA certification agencies,  
18 which is why we have termed our region a partnership for  
19 organic transition, not a center, to reflect the ethos of our  
20 work, guiding the region together in this five-year program.

21           Meeting online every other week for the last 10  
22 months and only meeting once in person to kick off during a  
23 snowstorm in March, our goal as core partners has been to  
24 create a strong network of networks led regionally by PCO, but  
25 with a central contact in each state, utilizing each of our

1 local sets of relationships and partnerships to create  
2 connections that will last well into the future of growing the  
3 transition to organic agriculture.

4 In addition to our lead and nine core partners, the  
5 region has added 36 project partners for a total of 45  
6 organizations collaborating in this work, just so far. We also  
7 have 95 mentees and 79 mentors, have reached over 2,000 farmers  
8 directly at events, and provided one-on-one technical  
9 assistance to 15 farmers.

10 Our region has either hosted or have staff attending  
11 85 events so far this year, and all of that work was done with  
12 just the core partners and 7 partners as we continue to build  
13 the program and recruit the additional partners for Quarter 3  
14 with our total number now standing at 45. Consistent feedback  
15 from these events has been that if we want more farmers to  
16 transition, we need to do a better job at making the business  
17 case for transition.

18 While we know the market development grants will help  
19 with that obstacle when they are announced, as we begin Year 2  
20 of this work in our region we will also be creating more  
21 regionwide programming to address that feedback, including  
22 coordinated marketing materials and outreach to farmers, making  
23 the business case for transition to certified organic.

24 Mentorship. The northeast mentorship program, as  
25 many across the country, will be launching in November. And we

1 wanted to feature a mentorship for you that can serve as an  
2 example to other farmers thinking about transition, a  
3 transition from dairy to tree fruit.

4 Russell Wallack was one of the first to sign up as a  
5 mentee in a mentorship program. And his operation, Breadtree  
6 Farms, is located in the northern Hudson Valley on about 600  
7 acres in the hill country, northeast of New York's capital,  
8 between freshwater Hudson River and Vermont's high tectonic  
9 mountains. At breadtreefarms.com you'll find lots of  
10 educational information, including Russell's own words.

11 He says much of the land here is actively farmed by  
12 family dairies. There are no interstate highways in Washington  
13 County and barely one DMV. We believe this place has the  
14 potential to become the breadbasket of the northeast. The  
15 first focus of our work is restoring landscapes by planting  
16 thousands of fruit trees. And we currently steward  
17 approximately 600 acres in the upper Hudson Valley without  
18 toxic chemicals, using strategies designed to build soil, clean  
19 water, and increase biodiversity. Breadtree is growing the  
20 regenerative chestnut industry in the northeastern United  
21 States. We farm to restore land to support a healthy climate  
22 and to build food security for future generations.

23 On the mentor side of that equation, we have Brian  
24 Caldwell, who runs a certified organic orchard and lot grow  
25 farm in West Danby, New York. Brian is also a founding member

1 of NOFA/New York and currently serves on NOSB in the public and  
2 consumer advocate role. On his profile, he says we believe  
3 that certified organic production is the most powerful, mutual  
4 approach to good farm stewardship at this time.

5 So Russell and Brian, we look forward to following  
6 this transition. And this is just one example of the type of  
7 farmer-to-farmer relationships that TOPP will build by the  
8 hundreds across the country.

9 CHAIR POWELL-PALM: Can we give a shoutout to Brian?

10 MS. KOBUS: Yes.

11 (Applause.)

12 MS. KOBUS: All right. I want to give a shoutout to  
13 the -- to the website committee here, too. So this next slide  
14 shows us the TOPP website. PCO led the committee of extremely  
15 talented staff from all six regions in developing and launching  
16 the TOPP website, including a national landing page and  
17 regional subpages.

18 All of the events for TOPP related work in the  
19 country can be found here. And they can be searched by state  
20 or region. We are already launching -- working on the launch  
21 of Version 2, incorporating suggested changes, more resources  
22 and mentorship participation, and training materials. So thank  
23 you to those committee members for your work to produce this  
24 resource in very short order. And our group will now pivot  
25 from website committee to marketing committee moving forward.



1           To grow equity and accessibility in the region, we  
2 are also working with Black Farmers Index across multiple  
3 states to bring resources to growing underserved communities of  
4 farmers with many of the nations urban population centers  
5 located in our region. That includes D.C., Baltimore, New  
6 York, Newark, and Philadelphia and Boston. We are eager to  
7 further connect the work of the local organizations that are  
8 serving their communities by redeveloping their neighborhoods,  
9 bringing fresh food to food deserts, and in many cases feeding  
10 the hungry materially and in spirit. Foundational community  
11 building on this level is work that provides lessons for all of  
12 us.

13           In addition, we are partnering with Grow Pittsburgh  
14 on a project that will create a template for helping urban  
15 farms transition to certified organic. NOFA/Mass, one of our  
16 core partners, also has a robust food access program and has  
17 developed a DEI program that provides the opportunity for  
18 communities of color to have sovereignty over and make useful  
19 connections around their relationships with the organic  
20 movement. They consider the foundational needs of these  
21 communities of farmers first, addressing systemic inequities in  
22 the process, and their team will bring educational programming  
23 and resources to our region.

24           Kaia Shivers here with me is president of the Black  
25 Farmer Index and is here to share about their work and the work

1 we have planned together with TOPP. Please welcome Kyla  
2 everyone -- Kaia.

3 DR. SHIVERS: Thank you. Thank you so much for  
4 giving me this platform and to give everybody a platform. My  
5 name is Dr. Kaia Shivers, but everybody calls me Kaia. That's  
6 my nickname. Started Black Farmer Index April 2020 as an  
7 answer to the growing food insecurity during the global  
8 pandemic. I started with two questions, who will be affected  
9 first when there is a food shortage and, secondly, how can I be  
10 a part of the solution.

11 Because so many black people live in food deserts and  
12 food swamps as a result of being forced out of the agrarian  
13 lifestyle, the answer was sobering. The remedy was to ask  
14 those in our communities who are closest to the food, black  
15 farmers. Thus began a commitment to bring as much business to  
16 black growers with a simple motto, direct consumers straight to  
17 farmers, all the while asking them how they survived  
18 generations of inequities in agriculture, to cull answers and  
19 an equitable agenda so we can all thrive.

20 We started with 150 farmers on our index. Today, we  
21 have over 1,200 growers listed in most of the united -- in most  
22 of the states in the U.S. And also we have a few farmers in  
23 USVI and Puerto Rico since we've expanded in our work to ensure  
24 that black farmers receive as much support, resources, and  
25 exposure to be fully and wholly included as businesses in

1 agriculture. During our journey, we were imbued with  
2 generations of agricultural stories that were rich in lessons  
3 and practices. Sadly, many are left out of the annals of  
4 America's narratives.

5 One piece of regularly shared information was that  
6 many of the growers used no chemicals, no pesticides, no  
7 invasive equipment, no till and other methods that will be  
8 called organic and climate friendly in agri business. However,  
9 these growers rarely if at all use the term organic. They  
10 describe their harvest and husbandry as tradition, the old way,  
11 or heritage, or heirlooms, what their parents, and  
12 grandparents, and ancestors spanning back before the Civil War  
13 taught them.

14 So committed to the land were black agrarian  
15 societies to the environment that farmers in North Carolina  
16 protested against toxic soil being dumped in their communities  
17 in 1982, which sparked what we call now the environmental  
18 justice movement. However, they are sadly invisible when it  
19 comes to environment justice talks. However, though, we  
20 discovered that they were largely absent all of these farmers  
21 who talked about organic farming from the organic industry and  
22 have yet to reap the rewards of their sacrifices.

23 We found out that these references to ecologically  
24 smart farming have been hijacked and often remixed.  
25 Unfortunately, the average black grower already has a fraught,

1 unstable relationship with USDA and local offices. But we know  
2 that if we can -- if we cannot truly equalize agriculture right  
3 now, the whole industry will be gravely impacted. As a result,  
4 a major part of our commitment is to ensure that black farmers  
5 have more representation as certified organic farmers.

6 Thankfully, several people saw our work as important in this  
7 initiative to transition as many growers into the certified  
8 organic space.

9 Working with northeast TOPP, we plan to use our on  
10 the ground engagement practices and rich relationships we've  
11 been cultivating with agriculturalists to build a community of  
12 growers who are certified and in a position to pass on that  
13 rich cultural knowledge of growing, all the while feeding folk.  
14 We are working in Virginia, Maryland, West Virginia,  
15 Washington, D.C., Delaware, New Jersey, and Pennsylvania. We  
16 will be very busy, yes.

17 We will do so by meeting the farmers where they are  
18 literally on the farms with intimate visits, where we have  
19 honest conversations about their needs, their interests, and  
20 questions about transitioning to organic. Also, we have  
21 planned an array of online and offline communications to  
22 consider farmers who are social -- who are media savvy in  
23 social media, and to even those who do not own a computer,  
24 which is a fact we come across more times than we want to admit  
25 in the field.

1           As well, we will be conducting townhalls and  
2 listening sessions that serve as a way to enhance the community  
3 of farmers, and provide a customized and culturally competent  
4 experience that explains the benefits of certification, and  
5 encourages them to join in a central part of agriculture that  
6 they've already been a part of for decades. Let me emphasize  
7 that farmers do not want handouts. Farmers do not want  
8 handouts. Farmers do not want handouts. They want their space  
9 in the market, and the resources and support that is owed to  
10 them, like the photo of the first slide, Purple Mountain  
11 Organics, founded by Dr. Amen and his family in Upper Marlboro,  
12 Maryland. Dr. Amen traveled and studies in Japan to learn how  
13 to harvest -- to learn better rice harvesting practices, to  
14 reduce the methane that comes from rice production.

15           So we went to the farm and helped him plant Japanese  
16 brown rice by hand in May. Dr. Amen is certified and has  
17 become a go-to in the black farming community in better rice  
18 planting methods, but is highly undervalued in the larger  
19 organic space.

20           The second slide we lovingly call Donna Deer (ph.)  
21 and Paulette Green (ph.), we call them the untees (ph.). They  
22 are transitioning to organic on land that Harriet Tubman's  
23 family once worked. And as a matter of fact, Paula Green --  
24 Paulette Green, who is in the yellow, this is the land that her  
25 family works, too, as well. So, okay, they are transitioning

1 to organic on the land and Harriet Tubman's family once worked,  
2 and is now an heirloom of Ms. Green. So we want to help them  
3 plant more of their agroforest and seasonal vegetables.

4 In closing, this type of work that we do, we know  
5 that farmers are committed to organic, but have been left out  
6 of the industry that has developed so many blind spots that  
7 must be corrected, so that real representation is achieved.  
8 And we are here to ensure that. Thank you for your time.

9 (Applause.)

10 DR. SHIVERS: Thank you.

11 MS. KOBUS: Thank you so much, Kaia. And thank you  
12 for the spirit that you bring to our work together. It's very  
13 meaningful for me. And I've got to shoutout to Stephanie  
14 Jerger from OTA for connecting us.

15 DR. SHIVERS: Yes.

16 MS. KOBUS: Yeah, Stephanie.

17 (Applause.)

18 MS. KOBUS: All right. So I'm going to kick off a  
19 series of updates now from each core partner. And because so  
20 much of this work is specific to place, each of us have about  
21 two to three minutes to present the view of TOPP's work from  
22 the perspectives of our own metaphysical -- metaphorical  
23 backyards. I guess metaphysical, if you're into it.

24 So mine is Pennsylvania. There we go. And those PCO  
25 is sharing responsibility also for Maryland and Delaware right

1 now, as you'll see on the maps. Thank you, Katie, for the  
2 wonderful maps with stars with each region and where they are  
3 having impact.

4 So in addition to PCO taking on the regional lead  
5 role in support of TOPP, Pennsylvania is home to organizations  
6 that are both at the foundation of the organic movement and the  
7 future, some familiar to you and some that may be new to you.  
8 The challenge to engage farmers into the process of transition  
9 is substantial. But by working with some of the best partner  
10 organizations on the planet to help, we are up for that  
11 challenge.

12 The only state with its own Farm Bill, we are also  
13 home to more farmers under the age of 35 than any other state  
14 in the country. And we have both the opportunity and the will  
15 to be our nation's leader in the transition to organic from the  
16 highest levels.

17 One event we really felt showcased the commitment of  
18 our Pennsylvania community to organic was Rodale Institute's  
19 annual field day, where farmers, students, and supporters of  
20 organic come to learn from the pioneers in organic research.  
21 Our staff tabled for TOPP and talked with farmers interested in  
22 transition, which is exciting in its own way. But more  
23 exciting was that Pennsylvania's Secretary of Agriculture,  
24 Russell Redding and our governor, Josh Shapiro, both made a  
25 point to come and support this work with our governor saying I

1 believe very simply if we want to grow our economy here in the  
2 Commonwealth of Pennsylvania, we must invest in farms, we must  
3 invest in ag, and I believe organic farming is key to that  
4 growth. We at PCO agree. And we continue to build our  
5 networks and programming in the state in support of TOPP.

6 So we're going to go down the line here and be a  
7 little patient with us. We're going to switch out kind of two  
8 at a time, when Devin is finished. But it's my pleasure to  
9 introduce to you Devin Cornia, NOFA/New Jersey's executive  
10 director, to talk to you about TOPP and his work in New Jersey.

11 MR. CORNIA: Good afternoon, you all. Thank you,  
12 Diana. Thank you for not making me follow Kaia. That's  
13 awesome. For those of you who aren't lucky enough to know New  
14 Jersey intimately, we're a very diverse state. Can you show us  
15 the map, please?

16 Organic farming in New Jersey has historically been  
17 clustered to the most wealthy areas in the state, which is  
18 really tough. As a really small organization with a small  
19 staff, we haven't been able to branch out and adequately reach  
20 our entire community. I've got farmers way down in South  
21 Jersey it takes 2 1/2 hours to get to. We don't have the  
22 staff, the resources, the time to support them. But now  
23 through TOPP we do. We're able to reach them. We're able to  
24 hire on additional staff, more resources, get the adequate  
25 resources to the folks that want to go organic but haven't been



1 there before. So that's huge right off the bat. We're  
2 reaching more farmers as a whole, relationships with the  
3 foundation for all the work that we do.

4           And again, if you're unfamiliar with New Jersey, we  
5 don't have great relationships in our industry. They've been  
6 siloed. Conventional farmers don't understand organic farmers.  
7 Organic farmers don't understand conventional or chemical-based  
8 farmers. And the resources and entities that support all of  
9 them don't always get along, don't integrate well. It's not a  
10 deliverable.

11           But for this TOPP program prompting us to get a fix  
12 on those relationships, bring us all together, understand that  
13 we're not that different is huge. And it's not a one, a two, a  
14 three-year deliverable. This is a 10-year deliverable that  
15 TOPP is going to have an impact on, which I'm really excited  
16 about.

17           So what are we doing in New Jersey to repair these  
18 damaged relationships? We're having events -- you can click  
19 the next slide. We're having events that draw both  
20 conventional producers in, as well as established organic  
21 producers who want to sharpen and hone their edge. We're  
22 having conservation webinars, soil health management, nutrient  
23 management webinars that speak the language to farmers that  
24 aren't currently engaged in the organic, shall I say more  
25 crunchy side of things. Being able to speak to both audiences

1 I think will really help heal. And TOPP is allowing that to  
2 happen.

3 To date, we have had events. Like I mentioned, the  
4 webinars. We've had a field walk on Closter Farm, highlighting  
5 one unique operation that is the only certified organic  
6 livestock and crops farm in New Jersey. There is only one.  
7 That's pretty wild. We're also supporting underserved  
8 producers with a partner, Food Shed Alliance, on one of their  
9 incubator sites. Now into 2024, we're really ramping up with  
10 community events and outreach. So we're going to be pounding  
11 the pavement. We're going to be in New Jersey, Eastern  
12 Pennsylvania, Delaware, attending farmers' markets, hosting  
13 field tours, community events, supporting the mentorship  
14 program, and just building those bridges back up that haven't  
15 existed yet for lack of resources.

16 So I want to give a shoutout to our partners.  
17 Because I think the biggest thing TOPP has afforded is the  
18 ability to work with these amazing people every other week,  
19 keeping us going, keeping us inflated instead of deflated. So  
20 thank you to PCO for being awesome regional leads. Thank you  
21 for the NOP and the NOSB, and everyone who made this happen.  
22 Back to you, Diana.

23 MS. KOBUS: Thank you, Devin.

24 (Applause.)

25 MS. KOBUS: So let's see, next we're going to bring

1 up Teresa Downey from NOFA/New Hampshire and Laura Davison.  
2 We're just going to kind of let everyone introduce themselves  
3 as they come up here.

4 MS. DOWNEY: Thank you. There we go, hello. I'm  
5 from NOFA/New Hampshire. I am the TOPP coordinator. I'm  
6 Teresa Downey. So NOFA/New Hampshire has developed a diverse  
7 network of 13 TOPP cohort partners to help build community,  
8 create programming, and increase outreach to farmers throughout  
9 the state. We are working with each cohort partner to develop  
10 events showcasing our specific areas of expertise, to assist  
11 transitioning farmers within their networks. Organizational  
12 partners are encouraged to cohost New Hampshire TOPP cohort  
13 events, providing increased networking opportunities for  
14 farmers across production practices and scopes.

15 Several on-farm New Hampshire taught cohort programs  
16 have taken place to date. These events provided community  
17 building and technical assistance opportunities for farmers and  
18 producers who may wish to transition to organic. At an  
19 intensive rotational grazing and grassland management workshop  
20 with NOFA/New Hampshire TOPP cohort partner Granite State  
21 Graziers and the Northeast Organic Dairy Producers Alliance,  
22 farmers walked the host farm's fields to see how their fencing  
23 system allowed dairy animals free access to organic pasture and  
24 the barn, while maintaining intensive grazing, as well as  
25 organic hay production.

1           On another on-farm workshop cohosted by our cohort  
2 partner Chesire County Conservation District, shared  
3 information on manure management with bedded packs. From  
4 structures and materials best suited for cows on dairy farms,  
5 to producing manure that can be spread on farms to improve soil  
6 for grassland management or sold as a value-added product, all  
7 aspects of manure management were shown and discussed.

8           At the strategies for growing potatoes, cohosted with  
9 our cohort partner Vital Communities, farmers were shown  
10 methods that can be used by small and medium sized farms to  
11 utilize field rotation, trap crops, trial pest management  
12 techniques, and restore equipment to make organic potatoes a  
13 staple crop of their yearly production.

14           We are looking forward to continuing to work with  
15 farmers and cohort partners in the coming months and year to  
16 expand TOPP resources across New Hampshire.

17           MS. DAVIS: Thank you, Teresa. I'm Laura Davis. Do  
18 you want to advance the slides? I'm with NOFA/Mass. And my  
19 job at NOFA/Mass, I'm also -- I'm a board member, as well as an  
20 organic certification assistance coordinator. I do some soil  
21 test analysis as well. What's cool about my job is that it was  
22 formed sort of from the sound and sensible program that USDA  
23 had back a while ago. And since then I've been working to help  
24 farmers and food processors navigate the organic certification  
25 process.

1           My other hats are I'm an organic vegetable farmer, as  
2 well as I co-chair the Interstate Council in seven NOFA  
3 chapters. So it's great to work with all of these groups,  
4 today. You can go back one, Diana. Thank you.

5           So really exciting to me is our partnership with  
6 UMass extension in Amherst, which is their flagship  
7 agricultural school. Since I've been involved at NOFA for the  
8 last 20 -- or 12 years, they had always told us that they teach  
9 people how to farm and it's up to the farmer whether they are  
10 going to choose conventional or organic production. And we  
11 finally over the years have made progress in that relationship  
12 and especially as TOPP came about to sign them up to deliver --  
13 develop and deliver a series of seven workshops for organic  
14 growing. So we're really excited about that, because this is  
15 the first time that they have done anything like that.

16           This is actually a picture of me and Congressman  
17 McGovern. He brought a cohort of about 30 people to my farm in  
18 August. And it included many from NRCS, FSA, World  
19 Development, and so forth. I was really surprised that no one  
20 had heard of TOPP yet. And the congressman says, no, we've got  
21 to get the word out about this, this is a great project. And  
22 he was -- he's always been a big supporter of agriculture in  
23 Massachusetts, as well as his whole district and in Washington,  
24 D.C., so we thank him for that.

25           Diana already talked a little bit about the NOFA/Mass

1 equity project. NOFA/Mass has been working internally on  
2 equity probably for about six or seven years, and they still  
3 hold dismantling racism training every two weeks for staff and  
4 board. And we're happy to report that that has made a world of  
5 difference within not only our board, but our staff, and the  
6 complexion of the people that come to our conferences. So  
7 we're really excited as we rollout TOPP to have this project  
8 involved with helping us to reach farmers of color.

9           And just looking ahead at this next project, we're  
10 looking forward to continuing our outreach to bring in farmer  
11 mentees and mentors. Of critical importance, I think, is  
12 figuring out a way to crack the nut of getting in front of  
13 conventional farmers. In Massachusetts, we right now have 10  
14 farmers that are signed up for TOPP to transition. They are  
15 all growing organically now, so they are not converting from  
16 conventional chemical practices to organic. So how do we --  
17 how do we get all of those farm bureau people to sign up,  
18 that's really the challenge is to get in front of those folks.  
19 So I will be looking forward to doing that. But we've got  
20 these 10 ready to go. And they are all eligible for  
21 certification in 2024, so that will be 90 acres next year for  
22 Massachusetts.

23           All of our mentees and mentors will, will be able to  
24 take advantage of our soil health services that we offer, which  
25 is showing them their microbes under microscopes, actually

1 doing soil test report analysis and amendment recommendations,  
2 as well as field soil health assessments. So we are pulling in  
3 those soil services for our, our mentees and our mentors as we  
4 work through TOPP. And we really do appreciate the  
5 opportunity.

6 MS. KOBUS: Thank you, Teresa and Laura.

7 (Applause.)

8 MS. KOBUS: All right. We're going to welcome Chris  
9 Grigsby from MOFGA and Ted Tomao from NOFA/New York.

10 MR. GRIGSBY: All right. Hello all, good afternoon.  
11 My name is Chris Grigsby. I'm the certification director at  
12 MOFGA, Maine Organic Farmers and Gardeners Association, MOFGA.  
13 We talked earlier about less acronyms, say it all out, so there  
14 we go.

15 We're proud to be a regional partner with NOFA/Maine  
16 within the Northeast Mid-Atlantic TOPP region. We really  
17 appreciate USDA's unprecedented support and funding for  
18 transition to organic programming. A lot of us have been doing  
19 this for a really long time. And to have the support of USDA  
20 is very meaningful.

21 Excuse me, I'm getting over a cold, so I apologize  
22 for the froggy throat. We're excited to be working with  
23 project partners, University of Maine Cooperative Extension and  
24 Maine Grain Alliance, who both submitted proposals through TOPP  
25 and received funding all the way through the finishing of the

1 project in 2027. These robust proposals will support their  
2 outreach and education of grain and wild blueberry producers,  
3 and transition to organic opportunities in Maine and the  
4 region.

5 In addition to wild blueberries, UMaine Extension is  
6 also focusing transition to organic outreach and training on  
7 dairy and livestock, mixed vegetables, and grain. There are  
8 roughly 430 wild blueberry land owners and 38,000 acres in  
9 Maine that are either conventionally managed or not certified  
10 organic. And due to current market opportunities, there is  
11 hope that through this programming and support, much of this  
12 land can be transitioned to organic, certified organic  
13 production.

14 Maine Grain Alliance plans to build on their, their  
15 efforts to train, support, and create market opportunities for  
16 grain producers in Maine and New England, including their  
17 unique efforts to host organic, heritage, and land raised grain  
18 educational workshops as part of their Heritage Seed Center at  
19 the Kennebec Valley Community College. KVCC has a five-acre  
20 educational farm currently certified organic by MOFGA and there  
21 will be additional acres added at the college through his  
22 partnership. Both partners will be hiring staff to directly  
23 support TOPP efforts and project deliverables.

24 So for 2024, looking ahead, MOFGA will be supporting  
25 these efforts through attendance at 18 partner events



1 throughout 2024, technical assistance and training,  
2 demystifying organic certification, and creating relationships  
3 with conventional farmers and educating them about  
4 opportunities within USDA's larger organic transition  
5 initiative. We plan to add staffing capacity for direct  
6 outreach and recruitment of transitioning producer mentees to  
7 create a robust, statewide mentorship program.

8 We will be building relationships and outreach in  
9 Aroostook County down east, in Western Maine, throughout six --  
10 through six of our own TOPP focused events. We also have as  
11 2024 goal of developing scope-specific training vides, which  
12 will be available for technical service providers, mentees,  
13 mentors, and conventional farmers, to provide NOP compliant  
14 guidance and details, as well as again demystifying the organic  
15 certification process. Thank you.

16 (Applause)

17 MR. TOMAO: Hello, everyone. I'm Teddy. I'm from  
18 Northeast Organic Farming Association of New York. I always  
19 just say NOFA, so I really have to think about it. I'm the  
20 Long Island transitions coordinator. I've been there for about  
21 a year and a half. I am also a new farmer on Long Island. So  
22 if we want to jump, it's okay, just jump to the next one, yeah.

23 So if you can see on the map here, this is a map of  
24 all they New York State certified farms. We are second in the  
25 nation for number of certified farms. And we have plenty of

1 area that can still be improved up there. We typically are  
2 growing for markets, such as locally produced organic in large  
3 cities, as well as throughout the state, and markets for  
4 regionally produced grains and pulse crops.

5 New York is among the top four states in percentage  
6 of farmland that is organic, with 4 percent of our land  
7 organic. And we are about the same as California and Maine,  
8 and just behind Vermont. New York has a vibrant agricultural  
9 infrastructure. We have very diverse production of crops, so  
10 there's great opportunity to transition more ag acres into  
11 organic. There is a big demand for regionally produced grain  
12 such as wheat, rye, and pulse crops. We also have improving  
13 demand on locally produced organic in cities such as the New  
14 York metro area, which is one of the largest markets in the  
15 U.S., and throughout the state. And we have a continued  
16 regional demand that is growing for local and regional organic  
17 dairy.

18 Up to the next one. So this is one of our events.  
19 So for the last year and half, I've been the Long Island  
20 educator. And when I started, we had different educators kind  
21 of throughout the state, but we didn't have a specific  
22 direction. So I was under a private grant that was working on  
23 a mentorship program, putting on events, and trying to help  
24 transition farms towards organic. And then a year later we  
25 hear about the TOPP grant, and it's the exact model that we

1 kind of wanted to start pushing out throughout our entire  
2 state.

3           So with TOPP, we're able to expand our reach with  
4 adding -- so right now we have two educators. We'll be able to  
5 add three more educators to cover five regions throughout New  
6 York State. And with this expanded, we'll be able to reach the  
7 sections of New York that we haven't been able to reach with  
8 just two, two educators.

9           We have events throughout all region of the State,  
10 such as technical assistance and community building. We have  
11 our winter conference, which is in January, where we'll have  
12 four TOPP tracks. And then we're planning regional events  
13 throughout each different areas so that people that can't make  
14 it to Syracuse still have access to their local communities and  
15 farming community to learn about organic.

16           We have also partnered with two different partners.  
17 We're with Glenwood (ph.), which have added TOPP to all of  
18 their craft events and have organic as a topic at all these  
19 farmer events, and on Long Island we partnered with East End  
20 Food Institute. Over the past year, East End Food Institute,  
21 NOFA/New York, and some other organizations were constantly  
22 putting on events, but not really collaboration all this much  
23 -- all that much. So TOPP gives us an opportunity to  
24 collaborate with our craft events. They put on 12. This year,  
25 six of them are going to be organic. And there will be TOPP

1 information at every one, so it expands our reach quite well.

2 We have also done a bit of TA and workshop  
3 improvement. We have better organic dairy practices from  
4 calculating DMI, compliance with regulations, to pasture  
5 improvement. For vegetable growers, we have more information  
6 on IPM and tree nuts. We have improved our information on how  
7 to certify through recordkeeping and farm economics. And then  
8 we have added information about grains and beans as a  
9 standalone, and a means of diversification for existing dairy  
10 production.

11 And the last thing that TOPP has really helped with  
12 New York is our mentorship program. We currently have 40 or 20  
13 mentees and 20 mentors signed up. Over the last three weeks,  
14 we have interviewed 30 of these 40, and we're really excited to  
15 get people matched up, talking to individual farmers about  
16 these opportunities. Really revitalized us. It's exciting to  
17 see where it can go. Thank you.

18 (Applause.)

19 MS. KOBUS: Thank you, Chris and Teddy. All right,  
20 we're going to welcome up Jeremy Pelletier from  
21 NOFA/Connecticut and Brent Wills from Virginia. Switch out  
22 those nametags.

23 MR. PELLETIER: Thank you for having us here, today.  
24 Thank you -- I want to reiterate thank you to PCO for getting  
25 us all together and corralling all these different groups in

1 the northeast to really come up with something exciting over  
2 the next few years. I would be remiss to not mention my  
3 colleague, who is there, Sherlene Rodriguez, who is actually  
4 running the TOPP program. But I'm lucky enough to come up here  
5 and speak to you all.

6           So we're -- my name is Jeremy Pelletier. I'm the  
7 executive director of the Northeast Organic Farming  
8 Association, the Connecticut Chapter. And we're excited to be  
9 here in the northeast region under the leadership of PCO. In  
10 Connecticut, we have a fairly unique situation, although  
11 probably not that unique with some of the smaller states, in  
12 that we have a very tight-knit agricultural community. We work  
13 well with the Department of Agriculture. We work well with the  
14 extension office. And we work well with the Farm Bureau,  
15 because we don't have a ton of organic farms. I think 66 or  
16 67. And so it's critical that we work with all these  
17 organizations in our state to provide the correct amount of  
18 resources that are needed.

19           So being a small state and a really tight-knit  
20 community, we're able to reach out to many organic farmers,  
21 transitioning farmers and farmers who have shown interest in  
22 becoming certified, many of whom we know on a first-name basis.  
23 So we are able to learn specific barriers to entry in becoming  
24 certified, what supports are needed in our state, and how the  
25 supports would work best with participating farms.

1           Partnering with UConn Extension and the new  
2 Connecticut Farmers Alliance, we seek to provide technical  
3 assistance, and a one-on-one consulting for both beginning and  
4 experienced farmers from, from plan to certification, for  
5 example, our getting started on organic farming conference in  
6 March, this March. We'll detail everything from land  
7 acquisition to organic application.

8           So, yeah, our strength in Connecticut is with our  
9 partnerships this year and our ability to provide technical  
10 assistance. We'll be rolling out several different projects  
11 over the next year, not including our mentorship program.  
12 Currently, we have 10 mentors and 10 -- 9 mentees, so not bad  
13 for a really small state.

14           UConn, for example, something I'm really excited  
15 about, will for the first time ever have an in-house organic  
16 farming specialist that will be available to all mentees and  
17 will extend their services to all farms looking to certify.  
18 This is something that they've shown interest to continue to  
19 fund, even after TOPP money runs out. So we're very excited  
20 about that. So this will include one-on-one technical  
21 assistance, farm visits, consulting, and general support to the  
22 farmers certifying.

23           The New Connecticut Farmers Alliance will be hosting  
24 a farmer-to-farmer conference, in addition, that'll be in  
25 January, to build community among transitioning farmers, and

1 build cohorts with some of these farmers who want to transition  
2 and work with each other in doing so. As I mentioned earlier,  
3 CT/NOFA will host the getting started in organic farming  
4 conference. And lastly, we have an organic certification  
5 expert on staff to walk farmers through the certification  
6 process once they've -- once they're ready to submit their  
7 paperwork.

8           So our goal with this project and these projects is  
9 to provide support at all points during organic certification  
10 so that we can, one, ensure successful transition and, two,  
11 demystify the certification process, so that even more farms in  
12 Connecticut can confidently make the decision to transition.

13 Thank you.

14           (Applause.)

15           MR. WILLIS: Thanks, Jeremy. Thank you all for having  
16 us here. My name is Brent Willis. I'm from the Blue Ridge  
17 Mountains in Virginia. I really appreciate the opportunity to  
18 come up here. I don't know who ended up drawing the lines for  
19 the regions on these things, but I just -- I want to speak for  
20 my West Virginia counterpart, Spencer, and myself to say we're  
21 really glad that we got lumped in with the northeast. Nothing  
22 wrong with the southeast, but typically we work with a lot of  
23 southeast, so we're really excited to, to work with a lot of  
24 the institutional knowledge and experience in organic  
25 production in the northeast. So it's a little overwhelming and

1 mind-blowing, to be honest with you, but we really appreciate  
2 the opportunity.

3 I've been farming for about 20 years with my wife in  
4 the Blue Ridge Mountains of Virginia. We raise pasture,  
5 poultry, and pork. And did beef for a while, and now we work  
6 on poultry breeding. And I've been trying to network a lot  
7 more in my role as program director with the Virginia  
8 Association for Biological Farming. So not only do I get to  
9 keep my head down on my own farm, but I get to work with a lot  
10 of other farmers who are learning and interested in, in  
11 transitioning in regenerative and biological organic methods.  
12 So it's really kind of a cool thing to be able to do, touch on  
13 all those sides.

14 As was mentioned earlier, I don't know if you know  
15 the numbers in Virginia, but we've got relatively few organic  
16 farms and processing operations in Virginia. So given that,  
17 there have always been gaps in the educational and outreach  
18 programs that support those farmers that are interested in  
19 transitioning to organic. And being able to partner with, with  
20 PCO and all these other wonderful organizations in the  
21 northeast is really going to allow us to provide that much  
22 needed technical assistance that's been missing for a long time  
23 in Virginia.

24 We're also partnering with organizations such as the  
25 American Farmland Trust, Virginia State University, which I'll



1 talk about in a few minutes, and the Virginia Soil Health  
2 Coalition. And we're able to extend our existing outreach and  
3 network potential beyond just the biological grower that we  
4 typically are familiar with, to increase the awareness of and  
5 adoption of certified organic in the Commonwealth of Virginia.  
6 As Devin mentioned earlier and kind of coupled with what Laura  
7 said, we have a lot of gaps. And we also have a pretty wide  
8 geographic and demographic changes across Virginia.

9           So what we decided to do early on and this, this  
10 photograph here is one of the workshops that we did this year,  
11 we decided to focus on specifically what we call a train the  
12 trainer aspect of the program, where we try to corral NRCS soil  
13 and water conservation and extension folks who are a little bit  
14 interested in organic and understanding what the TOPP project  
15 is all about, we focus on them.

16           And we get them on the farm and we talk about what  
17 those practices are, so that then they can go back and instead  
18 of when they get that call from the farmer that says I want to  
19 grow organic blueberries, instead of saying, yeah, sorry,  
20 you're on your own, there is a -- they can now say, hey,  
21 there's an organization that's doing some of this work, why  
22 don't you contact this guy. And so that's really been a  
23 helpful thing. Even just in the first six months of the  
24 project, I've seen a real difference in that. So it's really  
25 helping us get the word out more so than we've ever been able

1 to do before.

2           One of the most exciting things that we're really  
3 looking forward to now and I just saw the email come through  
4 this morning, we're having our 2024 winter conference in  
5 Roanoke, Virginia. We typically have a really cool winter  
6 conference, like a lot of organizations do. But this year we  
7 decided to have a focus on the TOPP project and we're able to  
8 provide a full day of pre-conference workshops specific to  
9 organic transition and learning more about organic production  
10 that will be free to all attendees. And that will really kick  
11 of our TOPP program for 2024.

12           We're going to expand that by providing additional  
13 workshops regionally across the state. And really looking at  
14 the diversity across Virginia. If you look at Virginia, it's a  
15 really wide state and agriculture is very different in the west  
16 than it is to the east. So we really have to focus on those  
17 different demographics and, and farming practices.

18           And as a part of the summit that we're doing this,  
19 this winter, we're partnering with Virginia State University  
20 and their small farm outreach program. One of the main reasons  
21 that we want to do that is because Virginia State University  
22 has a history as an HBCU. They're a solid partner in the  
23 effort to focus on equity and accessibility in organic  
24 production. So we're going to bring them in, because they help  
25 -- their small farm outreach program works with small, limited

1 resource farmers of color. And that's really going to allow us  
2 to expand the diversity that we have and that we can reach in  
3 Virginia.

4 So we really look forward to being a partner and a  
5 driver in this transition to certified organic in Virginia.  
6 And thank you for having us.

7 (Applause)

8 MS. KOBUS: Thank you, Jeremy and Brent. All right.  
9 Our next dazzling duo and last dazzling due, we have Spender  
10 Moss from West Virginia and Nicole Dehne from Vermont.

11 MS. MOSS: Well, good afternoon. My name is Spencer  
12 Moss. I'm the executive director of the West Virginia Food and  
13 Farm Coalition, one of those states as Jenny pointed out that  
14 has had a little less organic action over the years. I think  
15 we -- I discovered during our first TOPP gathering, actually,  
16 in the Poconos, I think we have about 20 or 21 certified  
17 organic farms, which blew my mind. I really did not expect to  
18 even have that.

19 So at the Food and Farm Coalition, we're a statewide  
20 organization. We're based in Charleston. And we work at the  
21 intersection of food -- or farm viability and food access. So  
22 what this work looks like for us is creating projects and  
23 programs for farmers and food entrepreneurs. We offer  
24 technical assistance. We do policy advocacy work. We  
25 coordinate programs and projects. We offer help even getting

1 farmers to work together collectively, which is a huge feat for  
2 central Appalachian farmers. Where is -- where is my -- Brent,  
3 you know how hard it is to get farmers to work together  
4 sometimes.

5 But I feel that to say we just actually filed the  
6 paperwork after working with this group of farmers for two  
7 years for the Mountain State Co-Hops Co-Op, and they'll come  
8 back up here again in a sec. So we do a lot of work across the  
9 state. And what we already knew about our farmers is that they  
10 already utilize organic practices and, and while they could not  
11 articulate this, they actually very much so believed in the  
12 tenets of organic and they very much believe in soil health.

13 What we have -- what we have learned is that, you  
14 know, the feedback that we've received from our farmers is that  
15 they are not necessarily interested right now in certifying,  
16 even though they believe in organic, because of, of the  
17 expense, more importantly the paperwork, and having, having  
18 somebody on their farm that they don't necessarily want there.  
19 Again, this is Appalachian culture that we're contending with,  
20 especially when we don't have market prices or market for  
21 organics. So they are not getting a price point back that  
22 warrants the additional work on their part. So we are working  
23 to change that. Like Diana mentioned, those organic market  
24 grants are out, so I have my fingers crossed for some action  
25 there.

1           With all of that said, we are using the TOPP program  
2 to really conduct outreach and education about the benefits of  
3 organic practices, ultimately utilizing those relationships to  
4 lead towards certification. Currently, we have three very  
5 enthusiastic mentees for -- in the State of West Virginia for  
6 the TOPP program. They are all part of that Mountain State  
7 Co-Hops Co-Op group that I previously mentioned.

8           We are working with a community-based farm, New Roots  
9 Community Farm in Fayette County, West Virginia. They're going  
10 to work on transitioning to organic here shortly, as well. And  
11 lastly we're working with the West Virginia Maple Producers  
12 Association, because some of those folks are very much so  
13 interested in certifying, as well. So that's exciting.

14           Looking forward in 2024 -- you can advance to our  
15 last slide there. No, no, no. We are excited to do more  
16 events, more outreach, grow our relationships, use our  
17 statewide staff to do this. Our biggest thing that we're going  
18 to introduce this year is a virtual coffee hour. So once a  
19 month we're going to have folks join us online. We're going to  
20 do a couple of minute update about what's going on with TOPP.  
21 We're going to do an education piece about some organic  
22 aspects, again utilizing that -- this opportunity for education  
23 to kind of reel people in. And then we'll have a 30-minute ask  
24 the -- ask the expert time in that coffee hour, again an  
25 opportunity to really grow relationships and sort of make all

1 of this work a little less scary.

2 So with that, I'll turn it over to Nicole.

3 (Applause.)

4 MS. DEHNE: Thanks, Spencer. My name is Nicole  
5 Dehne. I'm the certification director for Vermont Organic  
6 Farmers. And we are also, like my colleagues, excited about  
7 this funding and this opportunity. So, Diana, if you can  
8 advance to the next slide?

9 I wanted to talk specifically about why TOPP is  
10 important in Vermont and why the timing is important right now.  
11 Unfortunately, what we're starting to see is a decline in the  
12 number of certified operations that we certify in the state.  
13 So in 2022, we saw a 2 percent drop in the total number of  
14 producers and we're expecting to see a similar decline this --  
15 by the end of this year.

16 Part of the reason for this decline cause, some of it  
17 is the organic dairy crisis, some of it is just a number of our  
18 farms are retiring and they don't have any succession  
19 opportunities. So it does feel like there is an opportunity  
20 right now that TOPP might be able to address.

21 We're also seeing the complexity of organic  
22 certification and recordkeeping requirements increase. And  
23 because of that, producers really need more support in  
24 navigating the certification process. And then in general we  
25 always find that producers need support in implementing organic

1 practices. So that could look like improving pasture  
2 management or addressing biodiversity practices in sugarbushes,  
3 for example. So, again, just the opportunity right now for  
4 TOPP is important in Vermont.

5 Thank you, not quite done. So I want to talk a  
6 little bit about how we're implementing TOPP in Vermont. So we  
7 are also -- the model of partnership, we're also sort of using  
8 in our state, like the rest of our colleagues, but we're  
9 partnering with the following organizations.

10 So the Vermont Maple Sugar Makers Association, where  
11 it feels like an appropriate moment to say that we have close  
12 to 250 certified organic maple operations in Vermont. So it's  
13 definitely a growing sector and one that's becoming really  
14 important. We have more organic maple producers than any other  
15 type of farm in Vermont.

16 We're also partnering with the Northern Grain Growers  
17 Cooperative. And Vermont Way Foods, which is a collaborative  
18 food hub project. So they are aggregating product in Vermont  
19 and then trying to open up markets in Boston and New York.

20 And then we're also partnering with NOFA/Vermont's  
21 farmer services business planning team that does business  
22 planning work with different farmers.

23 So with assistance from our partners, we're  
24 implementing a farmer-to-farmer mentorship program. And like  
25 our other partners, it's going to connect beginning farmers to

1 our experienced, certified growers in the state. But we're  
2 also really excited about offering one-on-one technical  
3 assistance to these growers, hosting workshops and developing  
4 resources, all with this goal of making certification more  
5 accessible and understandable. Yes, now you may, thank you.

6 (Applause.)

7 MS. KOBUS: All right. Well, as we watch the fall  
8 season take hold here and the leaves change in the northeast,  
9 I'm so, so proud of what we've accomplished together in an  
10 astonishingly short period of time. I'm very grateful for the  
11 level of respect, contribution, and collaboration that this  
12 group brings. The organic farming and trade communities have  
13 created an entire industry through not always agreeing 100  
14 percent, but finding ways of working together for the good of  
15 all of us.

16 We have watched this process through TOPP up close,  
17 not only in the region, but across the entire country. And I  
18 would also like to recognize our five other regionaliates (ph.)  
19 for their comradery, their spirit of collaboration, and  
20 demonstrated care for the people doing this work together.  
21 Oregon Till, CCOS, OCIA, AMOSA, and FARV, and Yosef, thank you  
22 so much.

23 Our teams have collaborated on every set of guidance  
24 and tools that are governing this program to bring uniformity  
25 where appropriate nationwide. I'd also like to recognize



1 Leilani and Katie, and our team at PCO for your support and  
2 standing up this program. It has been an absolutely team  
3 effort at PCO.

4 So all of the successes that you heard today are  
5 barely after one year of getting the initial inquiries about  
6 TOPP. We all look forward to the evolution of this work we are  
7 doing together to better support all of our farmers and farming  
8 communities all over the nation. Of course, we have the  
9 stellar example of Dr. Jennifer Tucker and the team at NOP, who  
10 lead by example. They have been true partners in these  
11 cooperative agreements. And cooperative agreements, that means  
12 we celebrate our wins. We give and receive constructive  
13 feedback regularly. And we align all of our work on a massive  
14 scale. So we are -- we are all so grateful for USDA's  
15 investment in organic and indeed we are working to prove that  
16 organic is sustainable, it is regenerative, and it is climate  
17 smart, and the future of agriculture in the U.S. and around the  
18 world. So thank you so much.

19 (Applause)

20 MS. KOBUS: I think we have a mike floating around,  
21 if you have questions for the individuals.

22 CHAIR POWELL-PALM: I'm going to briefly hand it back  
23 to Dr. Tucker. And then we'll have some questions for you.  
24 Questions from the Board actually before Dr. Tucker? Allison,  
25 please go ahead.

1           BOARD MEMBER JOHNSON: Thank you so much to all of  
2 you. This is so inspiring and heartwarming. I'm just so  
3 impressed at how much has been done in a year and the  
4 trajectory that it puts this program on. I wanted to ask you  
5 about two things that are sort of peripheral to TOPP and I  
6 think really important to its success in the grand scheme. The  
7 first is in the organic transition initiative, we have three  
8 pillars, right? We have TOPP, we have the organic market  
9 grants, and then we have direct farmer assistance through NRCS.

10           And I think one of the things that will be really  
11 important, especially in regions where we have fewer organic  
12 producers already, is providing financial assistance to help  
13 them especially through the bumpy transition time and building  
14 toward hopefully a place where they are really paid in the  
15 marketplace and recognized for the benefits they provide.

16           Are you getting the support that you need to help  
17 producers connect with conservation programs and other funding  
18 sources that can pay them for the public benefits that they  
19 provide?

20           MS. KOBUS: I will say we've been talking a lot the  
21 last couple of days here about wanting more involvement from  
22 NRCS, because that particular pillar of the three is one that  
23 could be deployed a lot more easily and in a lot more areas.  
24 So that's an active discussion and definitely something where  
25 we could use some more support.

1 CHAIR POWELL-PALM: Dilip -- oh, sorry.

2 BOARD MEMBER JOHNSON: Okay, thank you. Oh, can I  
3 ask a second?

4 CHAIR POWELL-PALM: Of course. Go ahead.

5 BOARD MEMBER JOHNSON: Farm Bureau came up a couple  
6 of times. And I'm wondering one -- oh, gosh, I'm losing track  
7 of everyone already. But there was one positive existing  
8 relationship and then areas where maybe it still could be  
9 built. And I'm wondering what opportunities you see to  
10 leverage the relationships that are being built through TOPP to  
11 help those organic producers who already participate in like  
12 nonorganic organizations or build momentum and support within  
13 those other organizations to reinforce the work that's being  
14 done through TOPP.

15 MS. KOBUS: I hope this directly answers your  
16 question. I think that community building is, is a deliverable  
17 of ours. And we all in our different ways are working on that  
18 issue. Transition means we have to step into spaces where we  
19 aren't necessarily comfortable or traditionally comfortable or  
20 welcome. And so I think we're all working really hard to  
21 recognize the challenge, and give some grace and patience, and  
22 do that anyway, step into that space anyway. So definitely  
23 any, any Farm Bureaus, state level or local level, we would all  
24 love to be working with you. That's the conversation that,  
25 that we're all really eager to get moving and deepen those

1 relationships.

2 CHAIR POWELL-PALM: Dilip. And then Franklin.

3 BOARD MEMBER NANDWANI: Thank you for your  
4 presentations. You all have wonderful speakers. I have two  
5 questions for Dr. Shivers and one for Laura Davis. I'd like to  
6 first, again, applaud Dr. Shivers' efforts that she is working  
7 for a black farmer. And we heard yesterday that 99 percent of  
8 the white farmers in the U.S. and 1 percent -- sorry, 98  
9 percent white and 1 percent are the black farmers here in the  
10 U.S. So it's definitely her efforts are applaud, you know.

11 So the question is you mentioned that you are  
12 reaching out to U.S. Virgin Islands. And these islands are  
13 very unique. St. Croix, St. Thomas, St. John, on over. And I  
14 work with those organic farmers in those islands and I know how  
15 the challenges they are facing. So the question is that how  
16 you are reaching out to these farmers, and supporting, and  
17 working with them in those unique, you know, the islands, which  
18 are really need a lot of help and support especially in organic  
19 production.

20 When I was there like 10 years ago and I know that I  
21 don't want to go into the detail because of the time, but they  
22 really are going through a lot of these challenges, so the one  
23 question.

24 The second is about are you working with 1890  
25 institutions or how do you see the role of 1890 institutions in

1 your efforts, because 1890 institutions are -- they have kind  
2 of mandate to work and help African American committees.

3 The question for Laura Davis I have, like you  
4 mentioned that you teach all farmers conventional and no matter  
5 what. So the question is that how you motivate among that  
6 farmer group that you go for organic? By telling them the  
7 benefits or how do you encourage them that the organic has some  
8 benefits in this one. Thank you.

9 MS. KOBUS: It looks like Dr. Shivers may have  
10 stepped out for a moment, but we'll let Laura go, yeah.

11 MS. DAVIS: I'll be happy to answer the question  
12 about how do we motivate conventional farmers. That's  
13 definitely a huge challenge for us. But one of the things that  
14 we've done is try to educate them on the little farmers  
15 underneath the soil that are being killed by chemicals. So we  
16 have active microscopes at our conferences where they can bring  
17 a soil sample to see what is alive in their soil, bacteria,  
18 fungi, nematodes. And they get really excited if it's moving  
19 and alive on the big screen TV.

20 And so we start where they can really appreciate  
21 that. And we've had a couple of horticultural growers who have  
22 since reduced their reliance on chemicals and increased their  
23 biology. That's really what we're focusing on in our soil  
24 health group.

25 So we're hoping that by looking at it that way and

1 not sort of attacking them on their chemical use that they can  
2 learn and evolve. But it is definitely a challenge. But now  
3 that we're really excited about the UMass involvement, because  
4 the conventional farmers tend to really look to UMass Extension  
5 for a lot of -- well, we have a weekly newsletter they send out  
6 about what's going on in the field. So a lot of conventional  
7 readers appreciate that.

8 BOARD MEMBER NANDWANI: Thank you. Very well said,  
9 Laura. Because life below ground is equally important. And  
10 there is more like the billions of bacteria and other micro  
11 organisms, they play a very vital role in organic farming, as  
12 we know. Thank you.

13 CHAIR POWELL-PALM: Franklin, please go ahead.

14 BOARD MEMBER QUARCOO: Yes. My question is related  
15 to tracking. I'm interested did you encounter any hurdles to  
16 transition that surprised you or were all the hurdles things  
17 you knew going in, especially different demographic groups,  
18 they may come up with something that wasn't something that was  
19 on your radar. Did you -- did you encounter any of this?

20 MS. KOBUS: So one of the benefits and joys of  
21 working with a team of really strong leaders is that anything  
22 like that that comes up, I think we've -- we have tackled  
23 together or worked on a solution. I can't think of any, any  
24 particular challenges. Jenny mentioned that our region is very  
25 challenging sort of socially, right?

1 I mean there are really big populations centers.  
2 There are huge rural tracks and demographically. So there's  
3 definitely been some candid and honest discussion about  
4 demographics and how we approach each other. How we talk about  
5 DEIJ work in Massachusetts needs to be different than the way  
6 we talk about it in, in sort of the southern tier of our  
7 region. So that's not to say one is better or worse, it's just  
8 different.

9 And so, yeah, I think being -- staying curious,  
10 staying open -- thank you, Jesse Beckett-Parr (ph.), wherever  
11 you are -- and just being honest with each other. And this  
12 group in the northeast in particular, I have to say, has just  
13 been a joy to be a part of. They're -- they've just been  
14 wonderful support.

15 BOARD MEMBER QUARCOO: Thank you.

16 CHAIR POWELL-PALM: We're going to go Kim and then  
17 Amy.

18 BOARD MEMBER HUSEMAN: Thank you. And thank you so  
19 much for the presentation today. This has been very  
20 delightful. My question might be somewhat similar to  
21 Allison's, to this last set of slides. We're talking about  
22 partnerships with current entities that can be focused in the  
23 conventional space. Can you expand a little bit on the  
24 Northeast Grain Growers Co-Op and the partnership, maybe some  
25 successes or, or some roadblocks there? I believe that was

1 Vermont.

2 MS. DEHNE: Yes, so we're partnered with the  
3 Northeast Grain Organic Growers Co-Operative -- not organic,  
4 Grain Growers Co-Operative. And the biggest hurdle that we're  
5 seeing there is market. So there is interest in growing grain,  
6 but there isn't the market. And some of that is being  
7 addressed by the other arm of, you know, those folks have also  
8 applied to funding from the other arm of market development  
9 funding. But that is a big hurdle. And we're not seeing as  
10 many mentees in that area, as we had hoped because of that,  
11 because of that roadblock.

12 BOARD MEMBER HUSEMAN: Thank you.

13 CHAIR POWELL-PALM: Amy, please go ahead.

14 SECRETARY BRUCH: Okay, thank you. Wow, this was  
15 just very inspiring. It's lovely to hear how TOPP is being  
16 executed in the northeast and to hear all these stories is just  
17 powerful. I had a question for Dr. Kaia. I just saw you walk  
18 in. I love, love, love how you said farmers do not want direct  
19 payments. They don't want handouts. And you mentioned markets  
20 and the importance of developing competitive markets. Could  
21 you give me maybe kind of the top three areas that we could  
22 look at working on in the northeast? I know your crops are  
23 diverse. Your area is diverse. But what would be three big  
24 wins in market development in your region?

25 DR. SHIVERS: So a lot of these farmers -- excuse me.



1 A lot of these farmers farm, but they actually farm in food  
2 deserts. So they don't even have a market locally. So they  
3 expressed -- a lot of them think in terms of what they do in a  
4 communal sense. They would like to have more markets locally  
5 in where they live. That's one of the things they expressed.

6 They also need support in navigating the terms of  
7 getting it to market, the processing facilities. There is  
8 still a lot of racism in the processing facilities where either  
9 their food is getting destroyed or their food is getting  
10 stolen, whatever they take to the markets. So whatever type of  
11 management or protection, or even creating a processing  
12 facility where they feel safe, where they can get their food  
13 processed.

14 A third thing that they need as well is in markets,  
15 is marketing. So some type of support so that people know that  
16 they are actually growers. We also get when I travel, they're  
17 like, oh, my gosh, I didn't even know that there were black  
18 farmers. Because a lot of the narrative is, is that black  
19 farmers have had such a hard time, people think that they don't  
20 exist. So they need marketing support for their food.

21 And a fourth, I just -- I know you said three. I'm  
22 just going to add one more, is that okay?

23 SECRETARY BRUCH: Perfect.

24 DR. SHIVERS: We can go all day, every day talking  
25 about the market support. Black farmers need support in

1 getting into local markets, like farmers markets, too. So a  
2 lot of the farmers markets that are probably the most popular  
3 or the most well-developed have a great system in place. But  
4 the system does not take into consideration farmers who have  
5 been so maligned that they don't have Venmo, and PayPal, and  
6 CashApp, and this and that.

7           So also this push or drive to maybe provide some  
8 technical assistance or whatever is needed for them to be  
9 competitive at just farmers markets. So those are the four  
10 areas I would say that are most -- oh, a fifth, okay? And  
11 that's it, I promise you.

12           SECRETARY BRUCH: No, I love it. Thank you.

13           DR. SHIVERS: So there are row crop farmers, right?  
14 The average black farmer, we're talking about 10 acres, 15, 20  
15 acres. But there are row crop farmers. So in the commercial  
16 space, I always -- I challenge those big companies that are  
17 looking for bigger produce, I challenge them to kind of maybe  
18 reverse how they consider those who grow.

19           And what I mean by that is, is that they have  
20 contracts built out for farms or collective farmers for like  
21 years at a time. These collectives are not opening up to black  
22 farmers. They say we already have our contract. We're not  
23 moving somebody out to bring somebody in or lessening whatever  
24 it is that this profits.

25           So what else is needed is these conversations with

1 these bigger companies that need tons of food, how are they  
2 creating something to allow these black farmers to compete and  
3 get into either the grower collectives or create a specific  
4 BIPOC grower collective, so they could put their grains, and so  
5 on and so forth in. And that's it, I promise you.

6 SECRETARY BRUCH: Thank you kindly, Dr. Kaia.

7 CHAIR POWELL-PALM: Dilip, did you have a question  
8 for Dr. Kaia as well?

9 BOARD MEMBER NANDWANI: Yes. I think she's back now.  
10 Well, I was asking -- first, again, thank you for your  
11 presentation and reaching out to black farmer community. But  
12 two questions partly you answered to Amy's question. You  
13 mentioned about U.S. Virgin Islands and I was saying that these  
14 islands are very, you know, some are remote and uniquely  
15 located, St. Croix, and St. Thomas, and St. John. And I lived  
16 in those islands and worked with the organic community.

17 Those farmers, they really need a lot of support and  
18 they are going through some challenges, I learned. And so my  
19 question was that how you are reaching out then to supporting  
20 them and whether it is affecting assistance or any of that  
21 form.

22 The second question, I was asking about 1890  
23 institutions that they work -- they work for African American  
24 communities. How are you like working or collaborating with  
25 them, reaching out so that they can be very helpful in your

1 goals to achieve. Thank you.

2 DR. SHIVERS: Thank you so much for these questions.  
3 I'll start with -- I'll start with the first one and then I'll  
4 move on. So we also work with the southeast region, with  
5 Florida Organic Growers. That's where you have most of the  
6 HBCUs representation. So Florida Organic Growers has a growing  
7 relationship with HBCUs to bring them into the fold. We've  
8 reached out to HBCUs initially when we -- when I started the  
9 index.

10 What happened, I started the index in the pandemic  
11 and so communication was, was far and few between. So what we  
12 did is we just started hitting the ground and just going  
13 straight to farmers. What we realized, a lot of the farmers  
14 that are the strongest or ones with the most ability have great  
15 relationships with the extension programs at HBCUs, right? So  
16 we admittedly are just developing our relationships with HBCUs,  
17 let me say that.

18 And there is a -- HBCUs have, one of their major  
19 issues with agriculture, they are severely underfunded. And as  
20 well, from what we also understand, there is a lot of legal  
21 quagmire that exists in terms of how do we get the funding in  
22 order to go directly to the farmers to develop the programs  
23 with the farmers. So this is what, what we're hearing. So I  
24 wanted to, to say that. But there needs to be a lot more  
25 support at HBCUs in general, in the agricultural field.

1 USVI and Puerto Rico, so we, we reached out -- a lot  
2 of our work is done digitally still with a hope to do a  
3 follow-up. USVI has been more represented -- more represented  
4 on the index because English, and we are mostly an  
5 English-based organization, even though we've actually brought  
6 in two interpreters who speak Spanish, one interpreter speaks  
7 French and also Creole, which we have had to incorporate  
8 because are working in Louisiana.

9 So right now the, the communication is digitally.  
10 But what I can tell you about USVI and also meeting, there is  
11 one organic grower on USVI. But just like I said, a lot of  
12 these growers are practicing organic. There just needs to be  
13 more support on the infrastructure, especially in places that  
14 are remote or not in the mainland, because everything costs  
15 more. So you have more for compost, fertilizer, so on and so  
16 forth.

17 And so that's the same thing Puerto Rico. As I  
18 talked to quite a few people representing Puerto Rico about  
19 maybe a month or two ago is, is that the process is so  
20 expensive in regards to what the farmers make and the cost of  
21 living on the islands. I hope that gives you some insight.

22 BOARD MEMBER NANDWANI: Sure. Thank you.

23 DR. SHIVERS: Thank you.

24 CHAIR POWELL-PALM: Other questions from the Board?  
25 Gerry, please go ahead.

1 BOARD MEMBER D'AMORE: I needed to get on just to  
2 tell you that your enthusiasm is infectious -- it's on. Oh,  
3 just not close enough? My mouth needs to be close to it? Come  
4 on, guys. The enthusiasm has been really infectious. I'd like  
5 to just note that yesterday, NOC had a grower panel, mostly  
6 local, and on that grower panel there was a Native American  
7 named Mr. Speer (ph.) that fielded pretty much the same  
8 question of what do you need. And the answer also wasn't money  
9 or a handout. And it was powerfully said. I can't contribute  
10 more exactly. What he said was we need a seat at the table.  
11 And if you can reach out to him somehow, perhaps that could be  
12 -- please, go ahead.

13 DR. SHIVERS: One of the Black Farmers Index members  
14 is going to visit his farm tomorrow.

15 BOARD MEMBER D'AMORE: Super.

16 DR. SHIVERS: So we've already (inaudible/off  
17 microphone) six months ago in D.C., he had like a big cowboy  
18 hat on. I'm sorry, you all (inaudible/off microphone) are you  
19 a black farmer? He said, no, I'm a (inaudible/off microphone)  
20 So when I saw him yesterday, I said, look, one time was a  
21 coincidence, second time is divine. So we're overlapping  
22 there.

23 CHAIR POWELL-PALM: Dr. Kaia, I have a question for  
24 you. You were mentioning that -- and I'm sorry, I won't make  
25 you yell again.

1 DR. TUCKER: Yeah, can we get her a mike so the  
2 transcript will pick it up? Okay. Thank you.

3 CHAIR POWELL-PALM: You were describing several of  
4 your, your colleagues who are pioneering black farmers. How do  
5 we get them in this room? How do we get them to Milwaukee?  
6 How do we get them on public comments? How do we get them  
7 elevating their voices?

8 DR. SHIVERS: First, pay them. I, so, you know,  
9 self-admittance, I'm not a farmer. I jokingly say this, but  
10 it's true. I've killed aloe vera plants and cacti, right? But  
11 what I do recognize is that farmers are a business. So when  
12 you want them to come, you've got to pay them for their time.  
13 Because as we all know, all the farmers in the room, one of the  
14 members of Black Farmers Index is a farmer, they're always  
15 farming, or they're thinking about farming, or they're saving  
16 seeds, or they're doing that. So you must respect and pay them  
17 for their time.

18 You would never ask Elon Musk to come somewhere for --  
19 well, I mean now he's a billionaire, he can come for free. But  
20 do you understand the concept? So, one, you have to -- you  
21 have to pay them. Two, you have to totally give them a  
22 platform to, to express and speak how they see things without  
23 correcting them, right? And then there are cultural things  
24 that I think as well that you will learn along the way, the dos  
25 and the don'ts of what things.

1           A lot of people tend to look at black farmers and  
2 farmers of color, native farmers, Latino farmers, Asian farmers  
3 as being in a deficit. They don't want to be looked at as  
4 being in a deficit. They want to be looked at as farmers, as  
5 thriving. So that's another thing. You don't come at them as  
6 you poor littler farmer, blah, blah, blah, whatever, okay.

7           And then -- and let me tell you this, farmers from my  
8 experience operate very I would say through ancestor and  
9 lineage. Before I even got enrolled, I had to actually give my  
10 whole family tree and let them know that my family is from  
11 farming communities in the south, this and this and that, or  
12 they will not pick up the phone at all.

13           So one of the things is that you could call Black  
14 Farmers Index. And if you need somebody, representation, we'll  
15 locate farmers who we think are appropriate and are not over  
16 used. So another thing is, is that you'll tend to see the same  
17 farmers at every single function and they don't represent the  
18 like expansive farming community that's all over the country.  
19 So you want to be able to diversify what that looks like so you  
20 can gauge how farmers are actually farming and what they call  
21 farming.

22           Because when you're talking about 600, 700, 800  
23 acres, oh, my goodness. There is only on record two farms that  
24 are black-owned solely that own 1,000 acres or more. Two that  
25 are documented. One that is documented currently is fighting



1 for their land in Colorado, if you heard about the Colorado  
2 ranchers that are facing a lot of vitriol from the local rural  
3 community.

4           So I would say -- I would say that. But also and  
5 lastly, and in closing, in terms of how do you get farmers,  
6 plan events around growing seasons. If you're in the middle of  
7 a growing season, usually they are not going to come because  
8 they are planting or they are growing. So that means in the  
9 winter or low months. What we have learned for the index is,  
10 is that Louisiana specifically is to meet farmers at festivals.  
11 We didn't know that they grow around the sugarcane festival.  
12 They grow around the -- what the Latino community calls the Day  
13 of the Dead. It's actually called La Toussaint in Louisiana.  
14 And Mardi Gras. Right? So if you can meet them somewhere on  
15 Bourbon Street or whatever it is, they'll talk to you. But in  
16 between that, they are growing.

17           CHAIR POWELL-PALM: Thank you so much for that. I  
18 had a question for Spencer. That was and sorry if I missed it,  
19 what is the Co-Hops Co-Ops? What do they grow?

20           MS. MOSS: So that co-op was first created around  
21 growing hops. We actually got a research grant that we  
22 parlayed into helping eight farmers now get quarter-acre hops  
23 yards up and running on their property, which are really  
24 expensive to get going. And so initially around that. And  
25 then they've already -- we've just filed the paperwork and they

1 have already expanded to allow value-added producers into their  
2 co-op.

3 CHAIR POWELL-PALM: Thank you. I think I've got like  
4 11 more questions, so I'm going to spare you all and I'll find  
5 you directly. Yeah. But thank you so much again. With that,  
6 I'm going to hand it back to Dr. Tucker.

7 DR. TUCKER: Let's all give a huge round of applause  
8 for all of the speakers.

9 (Applause.)

10 DR. TUCKER: Inspiring is the word I would have used,  
11 too. So somebody used that word and that was fabulous. And  
12 this is one of six regions and they are all doing this kind of  
13 work, touching people on the ground across the country. So  
14 what phenomenal stories, what phenomenal people. And thank you  
15 so much. Diana, very nice job. You did a beautiful job. I  
16 know a lot of folks said after the last meeting, well,  
17 southeast region did really well, it's going to be hard to top  
18 that. And it really does, every single region when you start  
19 talking about your work, it is just incredibly powerful. And  
20 watching the comradery really grow across that group has been  
21 really inspiring. So thank you. One last round of applause.

22 CHAIR POWELL-PALM: Bravo.

23 (Applause.)

24 CHAIR POWELL-PALM: All right. So checking in on our  
25 agenda. We are going to be moving into livestock, chaired by

1 Kim Huseman. Do we want to take a break? Yeah, go ahead. Did  
2 you have something else, Nate? Sure, go ahead and then we'll  
3 take a break.

4 BOARD MEMBER LEWIS: Just as we head into Board  
5 business, I wanted to acknowledge a former colleague and dear  
6 friend, Stephanie Jerger's public comment. She leads the  
7 justice, equity, diversity, and inclusion work at the Organic  
8 Trade Association, and reminded us that the language we use,  
9 the words we use can be a barrier to access of the work that we  
10 do. So she pointed out two words specifically, regulatory and  
11 compliance.

12 And so I brought a bag of Halloween candy. So any  
13 time a board member says regulatory or compliance, they'll get  
14 one. And at the end of the meeting, we'll count it up and see  
15 who wins.

16 BOARD MEMBER HUSEMAN: We're not counting candy  
17 that's been eaten, though. Right?

18 BOARD MEMBER LEWIS: You can -- you can have  
19 different strategies, that's fine, Kim.

20 BOARD MEMBER HUSEMAN: It feels like the goal is not  
21 to say that. And so I feel like this is like the opposite.

22 BOARD MEMBER LEWIS: Well, I think it's mostly just  
23 to hold ourselves accountable, and sort of realize and  
24 acknowledge how much we use these types of words. Oh, this is  
25 organic Halloween candy, actually. And you don't have to eat

1 it. You can do whatever you want with it.

2 CHAIR POWELL-PALM: All right. Let's plan to break  
3 for 15 minutes, yeah. So we'll come back at half-past.

4 (Off the record from 3:16 p.m. to 3:31 p.m.)

5 CHAIR POWELL-PALM: All right, we are just coming up.  
6 I think we're a little past time, so I'm going to convince Amy  
7 Bruch to retake her chair. And so our first subcommittee that  
8 we're going to be reviewing today or for this week is  
9 livestock, chaired by Kim Huseman. And I'm going to hand it  
10 over to Kim.

11 BOARD MEMBER HUSEMAN: Thank you, Nate. Well,  
12 livestock, I think this is the first time since I've been on  
13 the Board especially as the chair that we've gone first as a  
14 subcommittee. So thank you all for staying this time for  
15 livestock. Livestock this season has been very specifically  
16 centered around the sunsets. But we do hear the community.  
17 There are -- there are some topics that are very pressing in  
18 the livestock industry and, and feel that those are at a point  
19 where we'll, we'll start to and continue to evolve, and add  
20 more to the livestock subset. But that being said, we're  
21 hitting it really hard in a lot of subcommittees right now. So  
22 for this particular fall session, livestock is, is relatively  
23 light.

24 So of the, the nine sunsets that we have to review  
25 this afternoon, we will go ahead and get started. The first

1 one that is set for review, okay, so the first -- the first  
2 sunset for review today -- do you want me to read them both in  
3 at the same time?

4 CHAIR POWELL-PALM: Sure, that would be good. Thank  
5 you.

6 BOARD MEMBER HUSEMAN: Okay. Will be the alcohols.  
7 And we have both ethanol and isopropanol listed at 205.603(a).  
8 Ethanol as a disinfectant and sanitizer only, prohibited as a  
9 feed additive. And isopropanol listed at 205.603(a) as a  
10 disinfectant only. Ethanol was voted out of subcommittee,  
11 motion to remove the alcohols from the National List was made  
12 by Nate Powell-Palm and seconded by Brian Caldwell.  
13 Isopropanol was motioned by Nate Powell-Palm and seconded by  
14 Kim Huseman. And both of these belong to Nate Powell-Palm.

15 CHAIR POWELL-PALM: All right, thank you, Kim. And I  
16 just want to correct a little bit that I think Kim is  
17 underselling how great a subcommittee livestock is and how well  
18 she runs it. And so our agenda is light and our work is  
19 effective because of her leadership. So thank you, Kim.

20 Ethanol and isopropanol, I reference back to the last  
21 panel we had which was I think November of 2020, where we  
22 talked about sanitizers. And I'm really excited to restart the  
23 panels. But I think back to that panel often where several of  
24 the experts talked about how to have a really effective  
25 sanitizer, sanitation regime you need lots of options. You

1 need a lot of effective options that you can rotate through so  
2 that you don't become too reliant on any one.

3 And I think we heard from the community that  
4 isopropanol and ethanol are two very important disinfectants,  
5 good sanitizer options to keep in the barn, in production, as  
6 we look to giving livestock producers all the tools that we can  
7 to make sure that they maintain a healthy and hygienic  
8 operation. Any questions from the Board on isopropanol or  
9 ethanol? Amy.

10 SECRETARY BRUCH: Not a question, but just a comment  
11 representing some of the farmer stakeholders' views on these  
12 substances, both in livestock and also in crops. Just the  
13 accessibility to get access to ethanol and isopropanol is  
14 really important when you need to disinfect an area. These are  
15 locally available, so ready to be used.

16 CHAIR POWELL-PALM: Amen, thank you. Nate?

17 BOARD MEMBER LEWIS: Just in the spirit of commercial  
18 availability and organic options, do you have any information  
19 around availability of organic, certified organic ethanol as a  
20 -- was that part of the discussion?

21 CHAIR POWELL-PALM: That was not part of the  
22 discussion, but I appreciate the question. Any other  
23 questions? All right. I'll send it back to you, Kim.  
24 Actually, never mind, I'm keeping this one. So moving from me  
25 as a committee member to me as Chair. So we're going to start

1 with the vote. We have a motion to delist ethanol and  
2 isopropanol. So vote -- a reminder that because of several  
3 absences, we have 13 board members voting this round, so 9 is  
4 going to be the super majority.

5 A no vote is going to be to keep it on the list. And  
6 a yes vote is to kick it off the list. So if we could start  
7 with Allison and we'll go around. I'll call your name. Please  
8 say your vote into the mike. Gerry, are you with me?

9 BOARD MEMBER HUSEMAN: No, that was me. There is no  
10 -- the motion was made in subcommittee. So we're just -- we  
11 discussed and then now we're at the voting. The motion was  
12 already made.

13 CHAIR POWELL-PALM: Brian?

14 BOARD MEMBER CALDWELL: Just wondering if we are  
15 voting both of these at the same time.

16 CHAIR POWELL-PALM: Thank you for that clarification.

17 BOARD MEMBER CALDWELL: Or whether they need to be  
18 separated. We're going to start with ethanol and then we're  
19 going to go isopropanol. All right, ready for the vote.  
20 Please go ahead. Allison, on ethanol.

21 BOARD MEMBER JOHNSON: No.

22 CHAIR POWELL-PALM: Brian?

23 BOARD MEMBER CALDWELL: No.

24 CHAIR POWELL-PALM: Nate?

25 BOARD MEMBER LEWIS: No.

1 CHAIR POWELL-PALM: Dilip?

2 BOARD MEMBER NANDWANI: No.

3 BOARD MEMBER D'AMORE: No.

4 CHAIR POWELL-PALM: Wait for me to call you first,  
5 please. Kyla?

6 BOARD MEMBER SMITH: No.

7 CHAIR POWELL-PALM: Amy?

8 SECRETARY BRUCH: No.

9 CHAIR POWELL-PALM: Kim?

10 BOARD MEMBER HUSEMAN: No.

11 CHAIR POWELL-PALM: Franklin?

12 BOARD MEMBER QUARCOO: No.

13 CHAIR POWELL-PALM: Wood?

14 BOARD MEMBER TURNER: No.

15 CHAIR POWELL-PALM: Logan?

16 BOARD MEMBER PETREY: No.

17 CHAIR POWELL-PALM: Carolyn?

18 BOARD MEMBER DIMITRI: No.

19 CHAIR POWELL-PALM: And the Chair votes no.

20 BOARD MEMBER HUSEMAN: Okay. We have zero yes, 13  
21 no, zero abstention, zero recusals, 2 absences, so the motion  
22 fails.

23 CHAIR POWELL-PALM: All right. We'll move to the  
24 vote on isopropanol. Starting with Brian this time.

25 BOARD MEMBER CALDWELL: No.



1 CHAIR POWELL-PALM: Nate?  
2 BOARD MEMBER LEWIS: No.  
3 CHAIR POWELL-PALM: Dilip?  
4 BOARD MEMBER NANDWANI: No.  
5 CHAIR POWELL-PALM: Gerry?  
6 BOARD MEMBER D'AMORE: No.  
7 CHAIR POWELL-PALM: Kyla?  
8 BOARD MEMBER SMITH: No.  
9 CHAIR POWELL-PALM: Amy?  
10 SECRETARY BRUCH: No.  
11 CHAIR POWELL-PALM: Kim?  
12 BOARD MEMBER HUSEMAN: No.  
13 CHAIR POWELL-PALM: Franklin?  
14 BOARD MEMBER QUARCOO: No.  
15 CHAIR POWELL-PALM: Wood?  
16 BOARD MEMBER TURNER: No.  
17 CHAIR POWELL-PALM: Logan?  
18 BOARD MEMBER PETREY: No.  
19 CHAIR POWELL-PALM: Carolyn?  
20 BOARD MEMBER DIMITRI: No.  
21 CHAIR POWELL-PALM: And the Chair votes no.  
22 BOARD MEMBER HUSEMAN: Also Allison.  
23 CHAIR POWELL-PALM: Oh, sorry, sorry. Thank you.  
24 Got me.  
25 BOARD MEMBER JOHNSON: No.

1 CHAIR POWELL-PALM: Thank you. And the Chair  
2 votes no.

3 BOARD MEMBER HUSEMAN: Okay. We have zero yes, 13  
4 no, zero abstentions, recusals zero, 2 absences. So the motion  
5 fails.

6 CHAIR POWELL-PALM: All right, back to you, Kim.

7 BOARD MEMBER HUSEMAN: Thank you, Nate. We'll have  
8 this process down before we start CACS in the morning.

9 SECRETARY BRUCH: Thank you.

10 BOARD MEMBER HUSEMAN: Thank you. I've learned the  
11 back button, there we go, all right. Next is aspirin listed at  
12 205.603(a), aspirin approved for health care use to reduce  
13 inflammation. I think we'll hear a lot this afternoon about  
14 the tools in the toolbox for proper livestock production and  
15 management. And when I reviewed the limited comments from this  
16 fall, they echoed the sentiment from the spring that aspirin is  
17 a relatively straightforward way to provide pain relief to  
18 animals. That it is easily accessible. It's available and  
19 it's well understood.

20 There was -- there was not a dissent or a negative  
21 approach to keeping aspirin on the National List. And I will  
22 go ahead and turn it back over to you, Nate, for questions.

23 CHAIR POWELL-PALM: Okay, yes. Any questions on  
24 aspirin from the Board? Hearing none, we'll go to a vote. So  
25 again a motion -- or, rather, a delisting is going to be a

1 no -- or a yes vote. Keeping it on is going to be a no vote.

2 And we're going to start with Nate.

3 BOARD MEMBER LEWIS: No.

4 CHAIR POWELL-PALM: Dilip?

5 BOARD MEMBER NANDWANI: No.

6 BOARD MEMBER D'AMORE: No.

7 CHAIR POWELL-PALM: Gerry is a no. Kyla?

8 BOARD MEMBER SMITH: No.

9 CHAIR POWELL-PALM: Amy?

10 SECRETARY BRUCH: No.

11 CHAIR POWELL-PALM: Kim?

12 BOARD MEMBER HUSEMAN: No.

13 CHAIR POWELL-PALM: Franklin?

14 BOARD MEMBER QUARCOO: No.

15 CHAIR POWELL-PALM: Wood?

16 BOARD MEMBER TURNER: No.

17 CHAIR POWELL-PALM: Logan?

18 BOARD MEMBER PETREY: No.

19 CHAIR POWELL-PALM: Carolyn?

20 BOARD MEMBER DIMITRI: No.

21 CHAIR POWELL-PALM: Allison?

22 BOARD MEMBER JOHNSON: No.

23 CHAIR POWELL-PALM: Brian?

24 BOARD MEMBER CALDWELL: No.

25 CHAIR POWELL-PALM: And the Chair votes no.

1           SECRETARY BRUCH: Okay. We have zero yes, 13 no,  
2 zero abstentions, zero recusals, and 2 absences. The motion  
3 fails.

4           CHAIR POWELL-PALM: All right, back to you, Kim.

5           BOARD MEMBER HUSEMAN: Thank you, Nate. Next we have  
6 biologics-vaccines, listed at 205.603(a), vaccines. The motion  
7 was made in subcommittee by Brian Caldwell and seconded by Amy  
8 Bruch. And this material belongs to Brian.

9           BOARD MEMBER CALDWELL: Well, we love these slam dunk  
10 kinds of sunset reviews, but biologics-vaccines is not one of  
11 them. So I'm going to read a bunch of stuff that's going to  
12 hopefully surround this issue and try to -- try to bring up the  
13 important points.

14           So vaccines are critical for livestock health and for  
15 the success of livestock farms. In general, they are quite  
16 effective. The issue is complicated by the presence of GMO  
17 vaccines or excluded method, vaccines made with excluded  
18 methods. They are listed at two places in OFPA. The first is  
19 at 205.603(a)(4) and that is -- that allows for unqualified use  
20 of vaccines. The second is at 205.105(e) and that says that  
21 vaccines produced with otherwise excluded methods, that would  
22 be GMOs, are allowed if they are approved according to the  
23 criteria for the inclusion of synthetic substances on the  
24 National List.

25           Okay. And there was -- there has been over the years

1 differing interpretations of these two listings. In 2019, the  
2 NOSB made a formal recommendation that the wording at  
3 205.105(e) be changed to allow GMO vaccines only when an  
4 equivalent non-GMO vaccine is not commercially available. This  
5 recommendation has not been adopted yet. And that being the  
6 case, it was really difficult to, to sort through all this.

7 But the livestock subcommittee approved the following  
8 for this review. And that is and it's written in the -- in the  
9 sunset review at the end. It says in spite of important  
10 concerns over nonactive ingredients and a GMO status of many  
11 livestock vaccines, the livestock subcommittee feels that the  
12 need for effective vaccines is critical for livestock  
13 production. Since the 2019s have not been implemented at this  
14 time, the livestock subcommittee has adopted the following  
15 interpretation.

16 And that is that this sunset review encompasses the  
17 entire class of synthetic livestock vaccines including those  
18 made with excluded methods. The livestock subcommittee  
19 encourages NOP to adopt the 2019 NOSB recommendation. In the  
20 meantime, our interpretation is that listing fulfills the  
21 requirement at 206.105(e) for all livestock vaccines. And with  
22 that, the livestock subcommittee finds biological --  
23 biologics-vaccines compliant with the Organic Foods Production  
24 Act and is not proposing removal.

25 So having gone through that, I'd be glad to try to

1 answer any questions.

2 CHAIR POWELL-PALM: Please go ahead, Wood.

3 BOARD MEMBER TURNER: Thanks, Brian. That's helpful.  
4 Can you just practically outline what that -- what that last  
5 statement from the committee means? Like could you put it into  
6 technical terms.

7 BOARD MEMBER CALDWELL: Yeah. So there are two  
8 listings for, for vaccines and one of them is, is a blanket  
9 approval in OFPA. And the second one says, well, GMO vaccines  
10 can be used, but they have to go through the, the sunset review  
11 criteria. And basically what, what this decision says is that  
12 since that 2019 recommendation has not been implemented, that  
13 this review will cover all, all vaccines, all synthetic  
14 vaccines, GMO or not, and say that they can be used. And it's  
15 just -- it's really a matter of, of practicality and, and the  
16 importance of vaccines to livestock producers.

17 BOARD MEMBER TURNER: In other words, when there is  
18 no -- when there is not an alternative?

19 BOARD MEMBER CALDWELL: No. This approval is, is  
20 blanket approval for all vaccines. There is no requirement --  
21 what we're doing here for commercial availability, that's not  
22 in there, because that, that part which is in the 2019  
23 recommendation has not been adopted yet. So rather than the --  
24 the alternatives basically include having to review every,  
25 every GMO, every synthetic vaccine basically, GMO or no, or

1 having to just review every GMO vaccine, or basically saying  
2 that, yes, they are all, you know, blanket approval, sort of  
3 what we do with electrolytes and a bunch of the other materials  
4 that we -- that we approve as a group. And this is just  
5 putting all synthetic vaccines, GMO and non-GMO in that -- in a  
6 group and then approving them. So in a lot of ways, not, not  
7 a great solution, but it's really kind of the only thing that  
8 we could see going forward.

9 CHAIR POWELL-PALM: Allison?

10 BOARD MEMBER JOHNSON: Thank you for the explanation  
11 and all your work on this. This is a messy one, particularly  
12 when we have an outstanding recommendation. My livestock  
13 knowledge is like this big compared to many of you, so I'm  
14 going to see if my perception is correct. Brian, you or anyone  
15 else please weigh in.

16 My understanding is if we were to limit the use of  
17 vaccines, that increases the likelihood of the need to treat  
18 with antibiotics and pull an animal out of organic production.  
19 Is that accurate that vaccines are one of our fundamental tools  
20 for ensuring that we don't need antibiotics in organic?

21 BOARD MEMBER CALDWELL: I think that some diseases  
22 that vaccines treat for can be -- can be treated with  
23 antibiotics. But in a lot of cases, it would just be loss of  
24 the animals or severe disease.

25 CHAIR POWELL-PALM: Nate?

1 BOARD MEMBER LEWIS: And simply ability to  
2 participate in a commercial livestock market. Many states have  
3 vaccine requirements to ship animals.

4 CHAIR POWELL-PALM: Other questions for Brian before  
5 I get started?

6 BOARD MEMBER D'AMORE: Yes, please. A quick question  
7 is if we find -- does this conform to everything else we do and  
8 the next time we could really challenge this decision amongst  
9 ourselves is in five years?

10 CHAIR POWELL-PALM: Yes.

11 BOARD MEMBER D'AMORE: Okay. Thank you very much.  
12 Sorry?

13 CHAIR POWELL-PALM: Go ahead, Wood.

14 BOARD MEMBER TURNER: Sorry. I have so many  
15 questions about this, because I'm not as close to this  
16 committee. So why is it on hold?

17 BOARD MEMBER CALDWELL: Oh, you mean why has the 2019  
18 recommendation not been adopted?

19 BOARD MEMBER TURNER: I'm curious, if you know, yeah.

20 BOARD MEMBER CALDWELL: That is a question for Jenny.  
21 But it's -- anyway, that's as much as I know, I guess on that.

22 CHAIR POWELL-PALM: Do you want to take that, Jenny?

23 DR. TUCKER: So this one is -- it is on the list. We  
24 do have it marked on the indices on hold. But it's not closed.  
25 It's on hold because there were a number of priorities that we



1 needed to move/add with. Again, a lot of our regulatory  
2 priorities have been guided by the listening session we had in  
3 2022. This was not actually rated all that horribly high on  
4 that -- in that regulatory priorities exercise. We really  
5 needed to get the trifecta, the triple crown done.

6 And so I think as we're moving ahead, we're going to  
7 continually re-evaluate regulatory priorities. This is one I  
8 get questions about a fair amount, so it is by no means it has  
9 not been closed. It's not off the table. It's just we have to  
10 work our way through the priorities.

11 CHAIR POWELL-PALM: Dilip?

12 BOARD MEMBER NANDWANI: So, Brian, thank you. Just  
13 to follow-up with what Wood said and I want to 100 percent  
14 understand that what we are voting today, these vaccines does  
15 include excluded methods and without excluded methods, so GE.  
16 Is that right?

17 BOARD MEMBER CALDWELL: Yeah, yeah. And maybe it  
18 would help if, if I explain that, that the second listing on --  
19 in OFPA specifically says that, that under excluded methods,  
20 that they cannot be used in organic production except for  
21 vaccines that again go through the sunset process. So that is  
22 an explicit exception with OFPA for vaccines. And I think it's  
23 because the, the writers realized that this was such a thorny  
24 issue. And for some diseases, non-GMO vaccines are not  
25 available. And so it's kind of like we're between a rock and a

1 hard place.

2 BOARD MEMBER NANDWANI: Yeah, that helps. Thanks,  
3 Brian.

4 CHAIR POWELL-PALM: Other questions for Brian? Wood?

5 BOARD MEMBER TURNER: I just want to say, Nate, you  
6 owe Jenny a candy.

7 BOARD MEMBER LEWIS: Thanks, Wood, for keeping us all  
8 accountable.

9 CHAIR POWELL-PALM: I really appreciate your work on  
10 this, Brian. This has been a thorny one. And it's a very  
11 interesting place we find ourselves, because the power of these  
12 tools is so significant for keeping us going as a commercial  
13 livestock concern. And I think that the folks we've heard from  
14 who are representing the, the most, you know, the most  
15 producers, the most voices, and have the biggest stake both  
16 commercially, but as representatives of those farmers, I would  
17 call out crop cooperative, as being very clear that this is a  
18 fabulous bright spot in organics that we said all vaccines.  
19 And all vaccines are allowed. And we know that there is not  
20 probably ever going to be a vaccine developed specifically for  
21 organic production, just because we're too small. And the  
22 investment, the public and private dollars it would take to  
23 create vaccines are so significant that they are going to be  
24 marketing it to everybody.

25 And so when we think about how do we both make sure

1 that we never put our livestock producers in a position where  
2 they are hesitating to use best preventative practices possible  
3 and never putting certifiers in a position where they're really  
4 outside their competency, quite frankly, that most certifiers  
5 are not going to have veterinarians on staff. They are not  
6 going to be able to truly engage, even if it was possible to  
7 find non-GMO alternatives of these vaccines. It's we have a  
8 lot of things we're asking certifiers to do, so it seems really  
9 reasonable to not have this be one of them.

10           Understanding the concerns in the community, as I  
11 think you have done so brilliantly, Brian, and making sure that  
12 we keep those concerns at the forefront, this seems like a  
13 really -- a fine compromise to acknowledge the 2019  
14 recommendation, but also a really great win for the livestock  
15 sector and our ability to make sure that we don't become sort  
16 of a disease Mary, as it were. That we don't become the, the  
17 outbreak that defines organic.

18           And so as we go forward with this vote, I again want  
19 to thank Brian for all the work you put into this. And ask if  
20 there's any other questions about biologics/vaccines? All  
21 right. So again a no vote will keep all vaccines on the list.  
22 And we're going to start with Dilip.

23           BOARD MEMBER NANDWANI: No.

24           CHAIR POWELL-PALM: Gerry?

25           BOARD MEMBER D'AMORE: No.

1 CHAIR POWELL-PALM: Kyla?

2 BOARD MEMBER SMITH: No.

3 CHAIR POWELL-PALM: Amy?

4 SECRETARY BRUCH: No.

5 CHAIR POWELL-PALM: Kim?

6 BOARD MEMBER HUSEMAN: No.

7 CHAIR POWELL-PALM: Franklin?

8 BOARD MEMBER QUARCOO: No.

9 CHAIR POWELL-PALM: Wood?

10 BOARD MEMBER TURNER: No.

11 CHAIR POWELL-PALM: Logan?

12 BOARD MEMBER PETREY: No.

13 CHAIR POWELL-PALM: Carolyn?

14 BOARD MEMBER DIMITRI: No.

15 CHAIR POWELL-PALM: Allison?

16 BOARD MEMBER JOHNSON: No.

17 CHAIR POWELL-PALM: Brian?

18 BOARD MEMBER CALDWELL: No.

19 CHAIR POWELL-PALM: Nate?

20 BOARD MEMBER LEWIS: No.

21 CHAIR POWELL-PALM: And the Chair votes no. I would

22 say that deserves a round of applause.

23 (Applause.)

24 CHAIR POWELL-PALM: I think that is a lift that Brian

25 gave so much to and I am so grateful for the time. So thank you

1 again, Brian.

2 SECRETARY BRUCH: Okay. The motion fails. We had  
3 zero yes, 13 no, zero abstentions, zero recusals, and 2  
4 absents.

5 CHAIR POWELL-PALM: And with that, back to you, Kim.

6 BOARD MEMBER HUSEMAN: Next on the list for livestock  
7 is electrolytes, listed at 205.603(a), electrolytes without  
8 antibiotics. The motion to remove electrolytes was made by  
9 Brian Caldwell, seconded by Kim Huseman. And this material --  
10 Brian, you got the hard hitters. I really appreciate your work  
11 on the livestock subcommittee. So I'll let you take it away  
12 with electrolytes.

13 BOARD MEMBER CALDWELL: Great. Yeah, thanks, Kim.  
14 This one should be a lot easier, I believe. Electrolytes are a  
15 class of relative simple and benign substances that are used to  
16 treat electrolytes imbalances in livestock that can result in  
17 severe pain and death to the animals. They are considered  
18 essential by just I think all the commenters that mentioned  
19 them in the -- in the written comments. The four that  
20 specifically noted were all in favor of relisting. And I think  
21 that's, that's it. I'm ready for questions.

22 CHAIR POWELL-PALM: Questions for Brian? You've done  
23 too good a job. Nothing. All right, with that we're going to  
24 go to the vote. Thank you again, Brian. And we're going to  
25 start with Gerry.

1 BOARD MEMBER D'AMORE: No.  
2 CHAIR POWELL-PALM: Kyla?  
3 BOARD MEMBER SMITH: No.  
4 CHAIR POWELL-PALM: Amy?  
5 SECRETARY BRUCH: No.  
6 CHAIR POWELL-PALM: Kim?  
7 BOARD MEMBER HUSEMAN: No.  
8 CHAIR POWELL-PALM: Franklin?  
9 BOARD MEMBER QUARCOO: No.  
10 CHAIR POWELL-PALM: Wood?  
11 BOARD MEMBER TURNER: No.  
12 CHAIR POWELL-PALM: Logan?  
13 BOARD MEMBER PETREY: No.  
14 CHAIR POWELL-PALM: Carolyn?  
15 BOARD MEMBER DIMITRI: No.  
16 CHAIR POWELL-PALM: Allison?  
17 BOARD MEMBER JOHNSON: No.  
18 CHAIR POWELL-PALM: Brian?  
19 BOARD MEMBER CALDWELL: No.  
20 CHAIR POWELL-PALM: Nate?  
21 BOARD MEMBER LEWIS: No.  
22 CHAIR POWELL-PALM: Dilip?  
23 BOARD MEMBER NANDWANI: No.  
24 CHAIR POWELL-PALM: And the Chair votes no.  
25 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,

1 zero recusals, 2 absent. Motion fails.

2 CHAIR POWELL-PALM: Thank you. Back to you, Kim.

3 BOARD MEMBER HUSEMAN: Okay. Next is glycerin listed  
4 at 205.603(a), allowed as a livestock teat dip, must be  
5 produced through the hydrolysis of fats or oils. The motion to  
6 remove glycerin from the National List was made by Kim Huseman  
7 and was seconded by Amy Bruch.

8 And that material belongs to me. I think it's  
9 already -- Nate, you should have said tools in the toolbox, not  
10 regulatory or compliance. You probably would have handed out  
11 more candy in the livestock subcommittee. That being said,  
12 having glycerin as an alternative and as a teat dip has been  
13 spoken through the farmer voice of necessity, and a nod to the  
14 acceptance of having multiple options.

15 Through the spring comments, most were very  
16 supportive of ensuring that glycerin remains on the National  
17 List. There was a nod or a request to validate the methodology  
18 in which the glycerin was being produced or manufactured as  
19 very specific that it is not in a synthetic manner. We did ask  
20 the question and we did receive feedback from certifying bodies  
21 of, of, you know, their way of being able to validate that the  
22 manufacturing process was by hydrolysis. So we did get that  
23 feedback.

24 I wouldn't say that there was much difference in the  
25 fall comments, not a significant amount of comments, but just

1 that reiteration of validation of the manufacturer process  
2 because of the -- because of the use of production through  
3 hydrolysis of fats and oils.

4 CHAIR POWELL-PALM: Questions for Kim? I don't have  
5 a question for you, Kim. But I do have a question for you,  
6 Nate Lewis. Instead of regulatory and compliance, what words  
7 should we use to make the language more accessible?

8 DR. TUCKER: Otherwise, Jenny is going to be on this  
9 massive sugar rush for the rest of the afternoon.

10 BOARD MEMBER LEWIS: I don't think we need to change  
11 our words.

12 DR. TUCKER: Give me a lifeline.

13 BOARD MEMBER LEWIS: I don't think they are bad words  
14 necessarily. I think it's mostly just to illustrate how we  
15 talk.

16 DR. TUCKER: I try really hard with the acronyms.  
17 But regulatory and compliance? I'm actually I'm dead serious  
18 on that. When people kind of -- when we hear, oh, some words  
19 are hard or they're hard to hear, anytime somebody can say try  
20 this instead it would really, really help. So do we have some?

21 CHAIR POWELL-PALM: So as a callout to the crowd,  
22 catch us at next break with recommendation for what we should  
23 be replacing those with.

24 DR. TUCKER: These are really good but --

25 UNIDENTIFIED SPEAKER: Rules and following the rules.



1 DR. TUCKER: Rules and following the rules. Oh, I  
2 can do that.

3 CHAIR POWELL-PALM: All right, game on. We're going  
4 to go to the vote, if we have no questions or comments for Kim.  
5 And we're going to start with Amy.

6 SECRETARY BRUCH: No.

7 CHAIR POWELL-PALM: Kim?

8 BOARD MEMBER HUSEMAN: No.

9 CHAIR POWELL-PALM: Franklin?

10 BOARD MEMBER QUARCOO: No.

11 CHAIR POWELL-PALM: Wood?

12 BOARD MEMBER TURNER: No.

13 CHAIR POWELL-PALM: Logan?

14 BOARD MEMBER PETREY: No.

15 CHAIR POWELL-PALM: Carolyn?

16 BOARD MEMBER DIMITRI: No.

17 CHAIR POWELL-PALM: Allison?

18 BOARD MEMBER JOHNSON: No.

19 CHAIR POWELL-PALM: Brian?

20 BOARD MEMBER CALDWELL: No.

21 CHAIR POWELL-PALM: Nate?

22 BOARD MEMBER LEWIS: No.

23 CHAIR POWELL-PALM: Dilip?

24 BOARD MEMBER NANDWANI: No.

25 CHAIR POWELL-PALM: Gerry?

1 BOARD MEMBER CALDWELL: No.

2 CHAIR POWELL-PALM: Kyla?

3 BOARD MEMBER SMITH: No.

4 CHAIR POWELL-PALM: And the Chair votes no.

5 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
6 zero recusals, 2 absent. Motion fails.

7 CHAIR POWELL-PALM: Thank you. Back to Kim.

8 BOARD MEMBER HUSEMAN: All right. Next on sunset  
9 review for livestock is phosphoric acid, listed at 205.603(a),  
10 phosphoric acid allowed as an equipment cleaner provided that  
11 no direct contact with organically-managed livestock or land  
12 occurs. The motion to remove phosphoric acid from the National  
13 List was made by Amy Bruch and was seconded by Nate Lewis. And  
14 this material belongs to Amy.

15 SECRETARY BRUCH: Thank you, Kim. Okay. Just to  
16 recap. After the spring meeting, the Board reviewed concerns  
17 from stakeholders regarding the need for clarity on several  
18 fronts. One was rinse or no rinse. Another one was what do we  
19 do with the downstream equipment. There was clarity needed  
20 surrounding the bulk tank that was downstream in the milking  
21 system equipment. Also, the third, third point for  
22 clarification and this is a little bit out of our jurisdiction,  
23 it's actual material review just to determine -- it's a  
24 function of inerts and if there are multiple products within  
25 the phosphoric sanitizer that includes inerts, should you have

1 a rinse or should you just proceed with no rinse after those  
2 products are being used.

3 So those three fronts demanded clarity from our  
4 stakeholders. We did catch word in the spring that there was  
5 an active ACA working group looking at these to try to provide  
6 clarity for the community. And I'm actually going to turn it  
7 over to my tablemate who sits in the certifier seat for just a  
8 brief update on ACA working group.

9 BOARD MEMBER SMITH: Okay. So there is a standing  
10 materials working group within the ACA. And so this is where  
11 that topic was discussed. So I checked in with that group and  
12 just asked about certifier consistency of interpretation and  
13 implementation of the annotation specifically. And the  
14 response that I got back, and I'll probably repeat this again  
15 in the handling subcommittee, because this is double listed. I  
16 will focus on the 603 listing here.

17 But, anyway, what I had received back was that the  
18 inconsistency with how certifiers would review is a little bit  
19 more broad and applies to all sanitizers. And there's  
20 different approaches that certifiers take to reviewing  
21 sanitizers. This is actually described in the ACA best  
22 practice document that is available on the ACA's website. And  
23 it talks -- it outlines different approaches for how certifiers  
24 review sanitizers broadly.

25 For the 603 listing, specifically it was noted that

1 there appears to be consensus that phosphoric acid annotation  
2 is managed and verified just like any milkhouse sanitizer,  
3 cleaner, or effluent. And it was just noted that there was  
4 discussion ongoing around the two listings and whether or not  
5 it's appropriate to align those listings, and again just more  
6 broadly the work that the Board could do with sanitizers, and  
7 again perhaps to fix the annotation.

8           SECRETARY BRUCH: Thanks, Kyla, for the update and  
9 collaborating with me on the sunset. All right. So just  
10 looking at it from our written comments from our stakeholders,  
11 despite clarity needing to be achieved, we still had seven  
12 written comments from certifiers, farmer groups, advocacy  
13 groups indicating consensus for support for relisting. And  
14 some of the comments in favor of relisting, one from a farmer  
15 group stated phosphoric acid is an essential material. It is  
16 used to remove deposits on equipment, such as milk lines and  
17 bulk tanks that cannot be removed with other sanitizers,  
18 detergents, or acids.

19           Advocacy groups mentioned environmental and health  
20 concerns. They mentioned also that phosphate is being mined  
21 and processed. The contact of phosphoric acid with skin and  
22 eyes should be avoided because of the corrosiveness. And  
23 phosphate pollution can contribute to nitrification of water  
24 bodies receiving treated wastewater.

25           There were a couple of comments for additional

1 improvement with the listing or just to help. And Kyla  
2 mentioned the one with the sanitizer panel or, sorry, sanitizer  
3 just working group, working an item. That's something we've  
4 heard that the Board should put on their work agenda. And then  
5 also this is for handling, but there is a little bit of  
6 difference in how the two listings, one under livestock and one  
7 under handling, are annotated. Stakeholders appreciated the  
8 defined or the more defined listing in livestock and hopes that  
9 that would carry over to handling.

10 So with that, I will open it up to any questions or  
11 discussion.

12 CHAIR POWELL-PALM: Questions for Amy? We lost the  
13 slides. Wood, please go ahead.

14 BOARD MEMBER TURNER: I just wanted to acknowledge  
15 this is a thread that we've had on several meetings now just  
16 related to sanitizers. And this is obviously something as we  
17 continue on we still don't have a process, right, how to do  
18 this exactly right. But I just want to acknowledge the  
19 committee's job, work, and sort of essentially trying to --  
20 trying to road test something like that. It's not exactly the  
21 process, but this is -- this is a lot better review I think  
22 than some of the past sanitizer sunset reviews.

23 CHAIR POWELL-PALM: Agreed. Other questions for Amy?  
24 Comments, questions? All right, with that we'll go to the  
25 vote. We're going to start this vote with Kim.

1 BOARD MEMBER HUSEMAN: No.  
2 CHAIR POWELL-PALM: Franklin?  
3 BOARD MEMBER QUARCOO: No.  
4 CHAIR POWELL-PALM: Wood?  
5 BOARD MEMBER TURNER: No.  
6 CHAIR POWELL-PALM: Logan?  
7 BOARD MEMBER PETREY: No.  
8 CHAIR POWELL-PALM: Carolyn?  
9 BOARD MEMBER DIMITRI: No.  
10 CHAIR POWELL-PALM: Allison?  
11 BOARD MEMBER JOHNSON: No.  
12 CHAIR POWELL-PALM: Brian?  
13 BOARD MEMBER CALDWELL: No.  
14 CHAIR POWELL-PALM: Nate?  
15 BOARD MEMBER LEWIS: No.  
16 CHAIR POWELL-PALM: Dilip?  
17 BOARD MEMBER NANDWANI: No.  
18 CHAIR POWELL-PALM: Gerry?  
19 BOARD MEMBER D'AMORE: No.  
20 CHAIR POWELL-PALM: Kyla?  
21 BOARD MEMBER SMITH: No.  
22 CHAIR POWELL-PALM: Amy?  
23 SECRETARY BRUCH: No.  
24 CHAIR POWELL-PALM: And the Chair votes no.  
25 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,

1 zero recusals, 2 absent. The motion fails. And I want to say  
2 thank you, I didn't say thank you.

3 CHAIR POWELL-PALM: And back to you, Kim.

4 BOARD MEMBER HUSEMAN: Okay, thank you, Nate. Next  
5 we will be doing the sunset review for hydrated lime, listed at  
6 205.603(b), as an external pest control not permitted to  
7 cauterize physical alterations or deodorize animal waste. The  
8 motion to remove lime from the National List was made by Kim  
9 Huseman and was seconded by Brian Caldwell. This material  
10 belongs to me for review.

11 And I'll start by saying you'll see a pattern here.  
12 We had phosphoric acid. We have hydrated lime. There's quite  
13 a few different materials that we'll see, alcohols is another  
14 one, across the different subcommittees. You will hear about  
15 hydrated lime again from Franklin, when crops gives their,  
16 their review.

17 In the case of livestock, hydrated lime, through the  
18 spring comments again were mostly in support as it is a  
19 necessity for good management practices for, for livestock. It  
20 is really another one of those tools in that toolbox. One  
21 commenter did bring up again that there could be some uses that  
22 are not intended for hydrated lime within the, the livestock  
23 aspect as far as using it as a -- as a deodorizer. But that's  
24 there for, for other uses and something to keep on the radar.  
25 But in the reviewing for the fall past that, all other comments

1 were directed towards crops. That's the analyst part of that.

2 CHAIR POWELL-PALM: All right. Questions,  
3 discussion, comments for Kim? Hearing none, we'll go to the  
4 vote. We're going to start with Franklin this time.

5 BOARD MEMBER QUARCOO: No.

6 CHAIR POWELL-PALM: Wood?

7 BOARD MEMBER TURNER: No.

8 CHAIR POWELL-PALM: Logan?

9 BOARD MEMBER PETREY: No.

10 CHAIR POWELL-PALM: Carolyn?

11 BOARD MEMBER DIMITRI: No.

12 CHAIR POWELL-PALM: Allison?

13 BOARD MEMBER JOHNSON: No.

14 CHAIR POWELL-PALM: Brian?

15 BOARD MEMBER CALDWELL: No.

16 CHAIR POWELL-PALM: Nate?

17 BOARD MEMBER LEWIS: No.

18 CHAIR POWELL-PALM: Dilip?

19 BOARD MEMBER NANDWANI: No.

20 CHAIR POWELL-PALM: Gerry?

21 BOARD MEMBER D'AMORE: No.

22 CHAIR POWELL-PALM: Kyla?

23 BOARD MEMBER SMITH: No.

24 CHAIR POWELL-PALM: Amy?

25 SECRETARY BRUCH: No.



1 CHAIR POWELL-PALM: Kim?

2 BOARD MEMBER HUSEMAN: No.

3 CHAIR POWELL-PALM: And the Chair votes no.

4 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
5 zero recusals, 2 absent. The motion fails.

6 CHAIR POWELL-PALM: All right. One more, Kim.

7 BOARD MEMBER HUSEMAN: Can you please forward the  
8 slide for me? We've got 45 minutes, you all, so we might as  
9 well just hang out.

10 CHAIR POWELL-PALM: Just enjoy it. Having a good  
11 time.

12 BOARD MEMBER HUSEMAN: There we go. Thank you, tech  
13 support. And let's go ahead and give a round of applause for  
14 tech support.

15 (Applause.)

16 BOARD MEMBER HUSEMAN: There's so much that is going  
17 on. And those puppeteering behind the background is so  
18 welcome, so thank you. I'm going to use all 45 minutes, Nate.

19 The last livestock subcommittee material review is  
20 mineral oil, listed at 205.603(b), for topical use and as a  
21 lubricant. The motion to remove mineral oil from the National  
22 List was made by Brian Caldwell and seconded by Kim Huseman.  
23 And Brian, this is your material. You have the floor.

24 BOARD MEMBER CALDWELL: All right, thanks, Kim. So  
25 the mineral oil for this purpose is a highly refined petroleum

1 oil, sometimes called white mineral oil. It has very low  
2 toxicity. It is an effective product and stable on the shelf,  
3 which is a valuable attribute, against external parasites which  
4 can cause serious, again, animal health issues.

5 This is -- this review, this listing is for external  
6 use only. There is a second listing that we -- that we  
7 reviewed a couple of years ago for internal uses. So again  
8 this is just for external uses. And it also includes  
9 lubrication, which as far as we can tell, as far as I could  
10 tell from looking at the literature and talking with folks is  
11 basically as a lubricant in terms of artificial insemination.  
12 So it's basically just used on the outside of the animal.

13 The written comments were three in favor of  
14 relisting. Several of the certifiers listed a lot of use by  
15 farmers. And in general it was not controversial amongst our  
16 commenters. So any questions?

17 CHAIR POWELL-PALM: Any questions for Brian?

18 BOARD MEMBER HUSEMAN: I have a question.

19 CHAIR POWELL-PALM: Go ahead, Kim.

20 BOARD MEMBER HUSEMAN: Is there benefit to coupling  
21 the two mineral oil listings and putting them maybe at the same  
22 time for review in sunset, just for ease of process?

23 CHAIR POWELL-PALM: I'd be a fan.

24 BOARD MEMBER CALDWELL: Yeah, I think -- I think it  
25 would be great. And that would probably mean that, that this

1 material, this listing would be reviewed like in three years  
2 instead of five, just to kind of have them both come up at the  
3 same time.

4 BOARD MEMBER HUSEMAN: We have another example of  
5 that that Amy is working on with xylazine and tolazoline that I  
6 think would be a good way to -- or at least precedent that we  
7 work that turn then.

8 SECRETARY BRUCH: And I think that might take away  
9 some of the confusion, too.

10 BOARD MEMBER HUSEMAN: By having those with alcohols  
11 listed.

12 CHAIR POWELL-PALM: Amy?

13 SECRETARY BRUCH: Brian, thanks for your review. I  
14 just had a question on alternatives. Are there any natural  
15 alternatives that are out there or effective?

16 BOARD MEMBER CALDWELL: Well, let me look at the --  
17 I'd have to look into the TR for that. I mean lime sulfur was  
18 just reviewed and that's used for some of the same, same  
19 purposes. Again, it's good to have a variety of, of tools for  
20 the toolbox. And it's highly effective. So there may be --  
21 there may be some, some natural products that would -- could  
22 also be used for this. But this is what's in standard usage.  
23 And if there are some natural products, I think we need more  
24 research on it to demonstrate them and bring them out, and then  
25 we can use them.

1           SECRETARY BRUCH: Sounds good. I didn't know if  
2 there was market opportunity, market expansion opportunity for  
3 any, any crops. So I just was curious. Thank you.

4           CHAIR POWELL-PALM: I don't want to be the one whose  
5 mind is just always in the gutter. But I think that there was  
6 just the most beautiful conversations about this material.  
7 We're all so trying to be extra polite about how we describe  
8 what we're talking about with artificial insemination. And I  
9 like your entrepreneur's opinion. I think there is always a  
10 chance for another crop out there.

11           I would say as a cattle producer who uses this  
12 material and artificially inseminates my own cows that I've not  
13 come across an effective analog that we would be able to use.  
14 But I think this has been, I think to Kim's point, something  
15 that we have spent a lot of time. Brian has done an excellent  
16 job researching. And could probably reasonably be combined  
17 back with, with the other listing for mineral oil.

18           Other questions or comments? All right, with that  
19 we'll go to the vote. We're going to get it kicked off with  
20 Wood.

21           BOARD MEMBER TURNER: No.

22           CHAIR POWELL-PALM: Logan?

23           BOARD MEMBER PETREY: No.

24           CHAIR POWELL-PALM: Carolyn?

25           BOARD MEMBER DIMITRI: No.

1 CHAIR POWELL-PALM: Allison?

2 BOARD MEMBER JOHNSON: No.

3 CHAIR POWELL-PALM: Brian?

4 BOARD MEMBER CALDWELL: No.

5 CHAIR POWELL-PALM: Nate?

6 BOARD MEMBER LEWIS: No.

7 CHAIR POWELL-PALM: Dilip?

8 BOARD MEMBER NANDWANI: No.

9 CHAIR POWELL-PALM: Gerry?

10 BOARD MEMBER D'AMORE: No.

11 CHAIR POWELL-PALM: Kyla?

12 BOARD MEMBER SMITH: No.

13 CHAIR POWELL-PALM: Amy?

14 SECRETARY BRUCH: No.

15 CHAIR POWELL-PALM: Kim?

16 BOARD MEMBER HUSEMAN: No.

17 CHAIR POWELL-PALM: Franklin?

18 BOARD MEMBER QUARCOO: No.

19 CHAIR POWELL-PALM: And the Chair votes no.

20 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
21 zero recusals, 2 absent. The motion fails.

22 CHAIR POWELL-PALM: Back to you, Kim.

23 BOARD MEMBER HUSEMAN: Thank you, Nate. I just want  
24 to take just a brief moment to say how excited I am to be able  
25 to serve as the chairman of the livestock subcommittee for the

1 past two years. I have a true passion for the livestock  
2 industry. Livestock and feed ingredients go hand in hand. So  
3 the more animals that we can introduce into the market space,  
4 the more farmers we can get to continue to grow grain, too.

5 So I really appreciate the support of the Board and  
6 of the community. And I will not be running for chair of the  
7 livestock committee next year, just --

8 CHAIR POWELL-PALM: I'm interested in how you think  
9 this works. There's no running for chair.

10 BOARD MEMBER HUSEMAN: It's on the record.

11 CHAIR POWELL-PALM: We're running a little bit ahead  
12 of time, which is great. And I -- so if it's all right, Kim, I  
13 would like to just sort of acknowledge an interesting comment  
14 that was made a few times in public comments, and that was  
15 asking about swine production. And I think as we get through  
16 very successfully, so thank you, Kim, the materials, we have a  
17 chance to think a little bit bigger about other aspects of the  
18 livestock sector that possibly we could be helping bring to  
19 light or at least explore with the community.

20 And so one, one thing I would put out to the  
21 community in general is just that I don't see where the market  
22 is, yet. It seems like when as ask to chicken and egg, do we  
23 have a strong market that is calling for this organic pork, or  
24 do we have a lot of farmers who want to grow it and, therefore,  
25 we need to find a market or build a market. I think it would

1 be wonderful if we were able to start hearing who are those  
2 organic pork buyers or brands, or who could we be reasonably  
3 pushing as a community to become an organic pork brand or  
4 buyer.

5 I think it's very easy to round up some organic pork  
6 farmer and have them tell us their best strategies. But I  
7 hesitate to, to put too many eggs in that basket before we know  
8 that there is a market, because we've been talking about for  
9 several days now how can we make sure there is a market when we  
10 get folks to transition.

11 BOARD MEMBER HUSEMAN: Can I add to that?

12 CHAIR POWELL-PALM: Please.

13 BOARD MEMBER HUSEMAN: And we're talking pork, not  
14 chicken. So we're talking bacon and --

15 CHAIR POWELL-PALM: Well, to be clear, no chicken is  
16 involved in this conversation.

17 BOARD MEMBER HUSEMAN: We'll talk about bacon in the  
18 pan, don't fry it all at once. We really did have some great  
19 robust conversation in the subcommittee regarding swine. In  
20 fact, not common practice, but we actually as a livestock  
21 subcommittee altered our research priorities for this fall that  
22 will be talking about voting on later on this week. And, and  
23 it does include now swine production very explicitly, that did  
24 not have that language before.

25 So I'd like to encourage from an institutional aspect

1 to list a university, other land grant universities, but may  
2 want to look at ways that we could put some dollars into  
3 research from an organic pork production standpoint. And not  
4 only from a buyer aspect, but just the challenges of swine  
5 production in an organic format. It is much different than  
6 raising cattle. And we start talked about vaccines and we  
7 start talking about other practices, and the barriers in that  
8 aspect as well. But it's a holistic process.

9           And I'll use the chicken and the egg philosophy in  
10 our conversation as, yes, you have to have buyers, but which  
11 comes -- which comes first. But there's so many different  
12 segments that I think are, are challenged in this space. So  
13 kudos to the community for continuing to, to raise this. And I  
14 look forward to see where this -- where this goes. And just  
15 wanted to again just reiterate and acknowledge the research  
16 aspect to it.

17           CHAIR POWELL-PALM: Thank you for that. Carolyn,  
18 please, go ahead.

19           BOARD MEMBER DIMITRI: I mean as part of the swine,  
20 organic swine conversation, though, I think we have to look at  
21 processing facilities. And I think that for most meat  
22 products, like the lack of organic processing capacity has  
23 really been a barrier to market development. So maybe the  
24 whole entire food system, rather than just looking at the two  
25 ends.



1 CHAIR POWELL-PALM: Thank you. Yes. Brian?

2 BOARD MEMBER CALDWELL: Just an anecdotal comment.  
3 Our local supermarket that we go to always has organic bacon  
4 available. And for many years, they had organic sliced ham for  
5 cold cuts. And then it disappeared for about two years, but  
6 now it's back. And we bought it every week. And I don't see  
7 why there wouldn't be an organic market for, for hams, and  
8 bacon, and sausage, just as there is for conventional. It  
9 seems totally reasonable to me. And I've -- the quality that  
10 we can get when it's available is very high.

11 BOARD MEMBER HUSEMAN: Also, this is another animal  
12 that eats organic corn, organic soybean meal, organic oils.  
13 I'm just putting that out there also from a shareholder --

14 CHAIR POWELL-PALM: And a lot of byproducts, right?  
15 I mean you -- let's go Wood and then Carolyn.

16 BOARD MEMBER TURNER: Nate, I just want to put you on  
17 the spot, because you talk a lot about market industries. Why,  
18 to Brian's point, why would there not be a market for, for this  
19 product? There's a market for chicken. There's a market for  
20 eggs. There's a market for beef. I don't understand this  
21 particular -- I just haven't -- I was really kind of amazed by  
22 the comments on this. And I'm sort of just excited to  
23 understand that better.

24 CHAIR POWELL-PALM: I think that question is one that  
25 I proposed back to the community, trying to figure out how we

1 can crowd source this information as best we can. There's a  
2 large brand, I'd call it an in crop cooperative, working on a  
3 pig rule, and asking them to bring that forth for what are the  
4 challenges accessing those markets, because there are certainly  
5 folks trying.

6 I don't really know. As an inspector, I've done a  
7 little over 3,000 inspections. I've inspected maybe one  
8 organic pig, maybe two operations. And, yeah, so I wish I had  
9 better, better insight on why. But I think back to Carolyn's  
10 point, if we look holistically at the supply chain for how does  
11 an organic hog grower access that slaughter infrastructure and  
12 then get to the market, usually that middle production point is  
13 kind of a bottleneck. Carolyn, please, go ahead.

14 BOARD MEMBER DIMITRI: This is my, my humor in  
15 action. I'm letting you know I think it's a joke before I say  
16 it. Brian, I wonder what happens to the rest of the pig. If  
17 you end up with bacon in the store, like where did the rest of  
18 the animal go?

19 BOARD MEMBER HUSEMAN: Organic casings.

20 BOARD MEMBER DIMITRI: Yeah.

21 CHAIR POWELL-PALM: Yeah, yeah.

22 BOARD MEMBER DIMITRI: But that's just typical.

23 BOARD MEMBER LEWIS: In our family, we said if pigs  
24 could fly, I'm sure their wings would be delicious. So just in  
25 the vein of kind of spit-balling a little bit about future work

1 for the livestock subcommittee, I do want to just put on the  
2 table and get into the record the agriculture standards which  
3 are languishing at the department, and the obligation for us to  
4 develop wild caught seafood standards. That's an important  
5 concern for the folks and stakeholders I work with in  
6 Washington, in the Pacific Northwest. And look forward to  
7 seeing if there is an opportunity to engage on that. And our  
8 farm, our family farm is on Puget Sound, so I'm a hobby  
9 shellfish grower, myself, so sort of close to the -- to the  
10 industry.

11 CHAIR POWELL-PALM: Any other thoughts? Any other  
12 aspirations for livestock subcommittee? All right. Well,  
13 again, thank you very much, Kim. Appreciate your leadership on  
14 this. And that's a wrap for day one, folks. So thank you so  
15 much. What a fantastic day. Really glad to see you all. And  
16 we'll do it again tomorrow starting with CACS.

17 (Whereupon, at 4:29 p.m., the meeting 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 2023 MEETING  
PLACE:                      Providence, Rhode Island  
DATE:                        October 24, 2023

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 *Elaine M. LaRosee* J.

\_\_\_\_\_  
Elaine M. LaRosee,  
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2023 MEETING

Wednesday,

October 25, 2023, 10:11 a.m., EST

Marriott Downtown Providence

1 Orms Street

Providence, Rhode Island 02904

National Organic Standards Board (NOSB) Members

Nate Powell-Palm, NOSB Chair

Mindee Jeffery, NOSB Vice Chair (absent)

Amy Bruch, NOSB Secretary

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

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Franklin Quarcoo

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Javier Zamora (absent)



USDA/National Organic Program Staff

Dr. Jennifer Tucker, NOP Deputy Administrator

Michelle Arsenault, Advisory Committee Specialist

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Johanna Mirenda, Agricultural Marketing Specialist,  
Standards

Heather Kumar, NOSB Technical Support Staff

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1 PROCEEDINGS

2 (Time: 10:11 a.m.)

3 CHAIR POWELL-PALM: Good morning, Board Members. Hope  
4 everyone had a good night. Excited for today. Really excited  
5 to hear from our guests today, so with that I'm going to hand  
6 it over to Jenny Tucker to kick things.

7 DR. TUCKER: All righty, good morning everybody.  
8 Welcome back for Day 2. Thank you for being here.

9 I am pleased to introduce Francie Tolle. This is  
10 actually the first day Francie and I've ever met in person, and  
11 yet we've worked together for like three years, so, woo, you're  
12 a live person. And so, Francie is here to talk about -- about  
13 crop insurance, but I want to give some background and  
14 personally thank her for being here.

15 Francie Tolle currently serves as the USDA Risk  
16 Management Agency Director of Product Administration and  
17 Standards Division, so her division covers national policy,  
18 underwriting, and loss adjustment, as well as the -- the  
19 specialty crop coordinator and new product development. She  
20 joined RMA in August of 2015 as the regional office director in  
21 Oklahoma City, covering Oklahoma, Texas, and New Mexico.

22 Previous to being at RMA, she served as the Oklahoma  
23 Farm Service Agency State Director. Her career also includes  
24 serving as the policy analyst for American Ranchers -- Farmers  
25 and Ranchers, Oklahoma Farmers Union working on federal farm

1 policy, agriculture liaison to Congressman Brad Carson, and  
2 executive director of the Oklahoma Wheat Growers Association.

3 Wow, you've been around. Yeah.

4 So, Francie served as the Oklahoma Farm Bureau Young  
5 Farmer Rancher State Committee chairman, has served on many  
6 agricultural advisory boards, was named as 2012 Oklahoma  
7 Agricultural Woman of the Year, and was featured as a  
8 significant woman in agriculture by the Oklahoma Department of  
9 Ag in 2017. She's a native of Oklahoma. She grew up on a farm  
10 and ranch. She and her husband continue to farm and have two  
11 sons. They are now raising their fourth generation on a farm.

12 MS. TOLLE: Seventh.

13 DR. TUCKER: Seventh generation on a farm, sorry.

14 And so, Francies been a great partner with us, that  
15 there are a lot of different offices across USDA, and they have  
16 been so good about really listening to what the challenges are.  
17 We collaborated on how do we, sort of, get transitioning  
18 farmers under our kind of our framework by having them listed  
19 in the Organic Integrity Database to provide an onramp for  
20 transitioning farmers who have done an organic system plan or a  
21 precursor for an organic system plan to be in the system and  
22 acknowledged by RMA. And these things are always harder than  
23 they sound on the surface, and Frankies really worked to get to  
24 yes on -- on a lot of things with us. And I've been very, very  
25 grateful for that.

1           And so, I'm going to turn the floor over to her.  
2 Frankie, thank you for being here.

3           MS. TOLLE: Good morning.

4           DR. TUCKER: Youve got to push the button.

5           MS. TOLLE: All right. Can -- is it -- can everybody  
6 hear me okay?

7           Thanks, Jenny. I really didn't know she was going to  
8 read the whole thing. My mom would have really liked to have  
9 heard that. But you did a great job.

10          MS. TOLLE: I -- have been on a farm all of my life.  
11 Have two boys; one is farming full-time, and I have a  
12 grandchild, but the -- the other one has pursued a music career  
13 in Nashville, and is singing and songwriting, so I raised two  
14 gamblers, completely. So, anyway, it's -- it's a great life  
15 but it's not always so easy.

16          I'm going to hit the -- just some high-level areas of  
17 crop insurance, and then also the report that came out that --  
18 that has been put together that you guys are going to discuss,  
19 I want to really applaud you for that, because one of the  
20 biggest challenges we have in crop insurance is we hear it  
21 doesn't work but we don't hear the specific of why it doesn't  
22 work, and we really need that in order to help. And I think  
23 you -- you would find in RMA right now that there is a big  
24 desire to bring everybody into the crop insurance program.

25          We really need to have organic producers and

1 transitional, specialty crops, everybody in the crop insurance  
2 program; there's no reason we should not because if you're  
3 farming it's -- it's incredibly capital-intensive and crop  
4 insurance just is a way that you can help sleep at night. You  
5 can, as well, you can go to the bank and get a loan. I know  
6 when my son started to farm he said. I think I'm going to buy  
7 60 percent crop insurance. And I said, really? Did you talk to  
8 the banker about that? He goes, no. And I said, maybe you  
9 ought to go do that. He came home and said, I think I'm going  
10 by 75 percent. I bet you are because what did he say your  
11 operating line was going to be? I bet it was going to  
12 correspond to whatever your crop insurance was going to be.  
13 It's important for everyone.

14 So, trying to work through this with you guys is  
15 incredibly important to us and so, I'll hit some high points,  
16 talk a little bit about what's in the report. We're not going  
17 to get through all this today, so I hope that this is just the  
18 first conversation that we have.

19 Just to start with, I want to give you an idea of  
20 what the federal crop insurance delivery system looks like. We  
21 are -- we work very differently than a lot of other agencies,  
22 like Farm Service Agency or NRCS. We are small. We've got  
23 about 390 employees, but our delivery system is very large. We  
24 go through -- our delivery system goes through what we call  
25 approved insurance providers, AIPs. There's -- there were 13 of

1 those in 2023, and from there those crop insurance companies  
2 have agents they contract with, there's over 12,500 across the  
3 nation, with over 5,000 adjusters, and those insurance  
4 companies work directly through the insurance policy, which is  
5 a contract with the producer. So, we have the largest safety  
6 net in farm programs, but we are the smallest agency. It's  
7 delivered through the private industry.

8           When we look at what we're going to implement, we --  
9 we have several different ways we come up with programs. One  
10 is legislation. We also have authority to develop programs.  
11 Our crop insurance policies that have been out for quite some  
12 time that are not pilots are codified, so they are in  
13 regulation. So, when we do a regulation, it's not like some --  
14 some agencies do regulations that are more restrictive.  
15 Generally, when we do a regulation it's because a producer  
16 group has come to us and says, hey, we'd like to change this  
17 policy. That goes through regulation.

18           So, another thing I would just mention is that crop  
19 insurance is the same price for a producer wherever you go.  
20 And I've heard even in -- in my area, maybe even at the dinner  
21 table -- it's surprising what I hear at my own dinner table --  
22 you know, this crop insurance or that crop insurance agent gave  
23 me a better deal. No, they didn't; crop insurance is the same  
24 for that producer regardless of where they go. What's  
25 different is the crop insurance agent may be offering you

1 different options on your crop insurance policy, different  
2 coverage levels because it's -- you can really tailor crop  
3 insurance to be different things for different people. So,  
4 what the crop insurance companies and the agents are competing  
5 on is service. How well can they service the producer?

6           We do have several different types of policy --  
7 individual crop policies. For 2023 we had 84 distinct organic  
8 price selections. Weve got a couple more coming in 2024. Weve  
9 got 18 crops that don't have a -- an organic price selection  
10 right now because of those three reasons I've listed: no  
11 know -- no known organic production in the insured areas;  
12 there's limited production in data; or pricing suggests the  
13 organic crops do not receive a premium over conventional  
14 products.

15           That No. 2 is our biggest issue, and that's mentioned  
16 throughout the report, is where do we get our data? How do we  
17 get data? We get it several different ways.

18           People bring it to us. The NAP Program was  
19 mentioned, and if you're familiar with the Farm Service Agency  
20 NAP Program, that's another place that producers can get  
21 coverage up to 65 percent. NAP's not required to be  
22 actuarially sound. So, the premiums that producers pay is just  
23 a flat rate; it's 5-1/4 percent of the liability. So,  
24 producers that are going and purchasing NAP at FSA, while we  
25 may not be able to insure it and be actuarially sound, if it's



1 being insured at NAP -- or at FSA through NAP, we can go get  
2 data there. So, if producers are doing that, that's one way.

3 Like I mentioned, sometimes we get data from producer  
4 groups, and I think there's a question about how much data do  
5 we need? There's not really a set amount but what we do need is  
6 multiple years of data that spans more than one producer for  
7 sure, maybe a county, there's not a set amount of producers,  
8 but the more producers you can get in an area and get  
9 production data over several years the more helpful it is.

10 Another thing that we've been able to do in some  
11 cases is to look at a proxy crop. So, if there's a crop that  
12 is similar, that yields similarly to whatever crop we're trying  
13 to ensure, sometimes well -- we will use that data.

14 In the report, too, there was one producer that  
15 mentioned small grains are not insurable in their area. Small  
16 grains should be insurable pretty much everywhere, but if it's  
17 not, we certainly would like to know where. And so, when  
18 comments are made like that, we really want to look and see  
19 where is this happening? And is there a way to expand?  
20 Written agreements were mentioned in the report that's a way to  
21 get crop insurance when it's not offered in the county; that  
22 is -- it involves more paperwork, and I can see why someone  
23 wouldn't want to do it. But I can tell you that is how we  
24 expand, so when regional offices get a written agreement  
25 request, and they do that, they know that there's interest,

1 they know what the production is in that county, and they can  
2 expand more easily.

3           The contract price addendum, I think most of you that  
4 are familiar with crop insurance are aware of that. That came  
5 into being in 2014. I'm not going to spend a lot of time on  
6 that, but that was brought about to get to a price that is more  
7 comparable to what the value of the crop is for organic.

8 Generally, most crops have a maximum value of two times the  
9 conventional price or 1-1/2 times the announced premium organic  
10 price selection. I just put a simple example with corn because  
11 it's -- it's very easy when -- up right there. You can see  
12 conventional price is 5.91, organic price was 11.10, and the  
13 maximum contract price factor for corns 1.5, so the maximum  
14 contract price is 16.65. And I put a link to the fact sheet  
15 there if you want more information. This presentation you can  
16 give to whoever you want, so you can follow back up and -- and  
17 take a look. I put some links and different information  
18 throughout.

19           There are several kinds of plans that are available.  
20 Most popular are yield and revenue protection. Just like it  
21 sounds, you're insuring the yield or the revenue, which is  
22 yield times price and you're insuring a percent. Generally,  
23 it's 50 to 85 percent coverage level. That means, for example,  
24 if a farmer is -- got 70 percent coverage level, there's a 30  
25 percent deductible, so there's that 30 percent that they're

1 going to have to cover themselves.

2           There are various endorsements and supplemental  
3 policies out there that producers can have that help fill that  
4 deductible, and generally those are area type plans; they're  
5 not specific to the producer, so they're generally based on the  
6 county. A few of them that I've listed. They are: STAX --  
7 excuse me -- STAX, which is cotton related; Supplemental  
8 Coverage Option; Enhanced Coverage Option; and then the  
9 Hurricane Index Protection plan, which we added tropical storm  
10 to this year. That helps give the producer an opportunity to  
11 get up to a higher coverage level, generally 90 to 95 percent,  
12 with the -- with the exception of SCO, that's 86 percent.

13           So, what does that look like for organic and  
14 transitional? Just to give you the ideas of the acres that  
15 participate in these kinds of supplemental policies, ECO has  
16 grown quite a bit, 38,000 to 112,000. HIP-WI, which is the  
17 hurricane, 29 to 36 thousand. SCO, 96,000 to 147,000 acres.  
18 And then STAX, 19,000 to 45,00. So, those are just ways a  
19 producer can get to higher coverage levels. It -- it is  
20 expensive in many areas, depending on the risk. I live in  
21 Oklahoma, I farm in Oklahoma, it's expensive. So, it really  
22 depends where you are.

23           We also have Area and Rainfall Index Programs, like  
24 the Pasture Rangeland Forge Program that was mentioned in the  
25 report. That coverage is -- covers perennial crops 70 to 90

1 percent. We did add the organic -- excuse me -- the organic  
2 and transitional practice to that last year, so those producers  
3 that had that policy could take advantage of the Transitional  
4 Organic Grower Assistance Program, which provided additional  
5 premium. I'm going to get into that later.

6 Also, area plans, again, if you instead of wanting to  
7 have an individual crop policy, you can look at a -- a county  
8 wide policy, which sometimes is less expensive, but with that  
9 because it's a county policy, it doesn't exactly follow what  
10 happened on your farm. You may have a loss, county did well,  
11 so you -- the -- it's not going to trigger an indemnity. So,  
12 again just lots of different options for coverage out there.

13 The big one that is talked about a lot within  
14 specialty crops and organic is Whole Farm Revenue and Micro  
15 Farm, and it was mentioned a lot in the -- in the report.  
16 Whole Farm Revenue was first offered in 2015, and Micro Farm in  
17 2022. Both of these policies cover all crops under one  
18 insurance policy. So, if there's a crop that is not -- unable  
19 to be insured individually, this is one way to get coverage for  
20 it. I'm not going to go through how Whole Farm and Micro Farm  
21 work. I certainly will later. I'm going to be around all day,  
22 too, if anybody's got more questions even after this.

23 But what I do want to point out is, we made a number  
24 of new provisions this year for 2024, and most all of those  
25 came from -- we did a Whole Farm Roadshow where we went all

1 over the country talking to producers and agents, and tried to  
2 incorporate as much feedback as we could, and so those are  
3 where the -- the new things came from.

4 One, just extended sales close date -- close date --  
5 closing date for Micro Farm. That was one that agents were  
6 like, you know, I've got March 15th as a sales closing date,  
7 I've got all these other policies, I don't really have time to  
8 go out and get small producers insured, and if I had a little  
9 more time to talk to them it would help, so we extended the  
10 sales closing date by 30 days.

11 In the report there was a -- a producer that  
12 mentioned that they didn't know if a Whole Farm was subsidized,  
13 and it is. And we made some changes to that just this year.  
14 So, previously if you only had one crop that you were covered  
15 with Whole Farm -- that you had with your Whole Farm policy, so  
16 let's just say you had a sweet corn, that's the only crop you  
17 have. Period. You were not eligible for 80 to 85 percent  
18 coverage; now you are.

19 We also increased the subsidy level. So, you can see  
20 at the bottom there, that the subsidy level between 50 and 70  
21 percent is 80 percent, so the government is subsidizing 80  
22 percent of the premium. At 75 percent, 80 percent, 85, it goes  
23 down some. If you've got two or more commodities, the subsidy  
24 is a little bit higher. So, that's there just for your  
25 reference on subsidy.

1           Generally, for the Crop Insurance Program, subsidy  
2 across the Board -- and I'm talking about forever -- for  
3 everything -- is 62 percent.

4           A few notes on Whole Farm. One of the notes from the  
5 report talked about that expanding -- it's really difficult for  
6 expanding farmers, because it goes back to the T-yield, and  
7 that's -- that's probably just a misunderstanding. There are  
8 expansion provisions in both Whole Farm, as well as Micro Farm,  
9 and those expansion limits are based on their own -- your own  
10 production and your -- your own pricing. So, I just put that  
11 in there for -- for reference.

12           There was also a reference in decreasing  
13 participation in Whole Farm Revenue, and Whole Farm Revenue  
14 does not mean necessarily specialty or organic crops. As a  
15 matter of fact, we have a lot of row crops -- conventional row  
16 crop growers that use Whole Farm. And in the last couple of  
17 years, when prices were so high, they dropped out of the Whole  
18 Farm Revenue Program.

19           For organic specifically, if you look at the number  
20 of Whole Farm Revenue policies that identified a commodity in  
21 the farm plan as organic, there were seven in 2015, and in --  
22 and there were 274 in 2023, so that part is growing. It's not  
23 growing as much, and I hope we can make more changes to whole  
24 Farm that make it more appealing.

25           Also, one of the -- the comments was looking for

1 better ways to include beginning farmers and ranchers. One  
2 hundred percent agree, and that's one of our priorities this  
3 year. The issue with Whole Farm and Micro Farm is, if you  
4 don't have history you can't be insured because that's what  
5 it's based on. So, what do you do with the beginning farmer  
6 that doesn't have any history? What do we -- what do we insure  
7 them for? We have a few ideas hopefully we can work through  
8 that before the next crop year and come up with something.

9           Also, the reduction in paperwork. We've continually  
10 tried to do that. We can still do better I'm sure. Year  
11 before last, we removed expense reporting, which was a big part  
12 of Whole Farm Revenue.

13           We also have a new program out called Production and  
14 Revenue History. PRH is designed for specialty and organic  
15 crops as an individual crop policy, but the producer is using  
16 their own price and yield history. It was initially offered  
17 for strawberries in 2021, first in Florida, then in California.  
18 And we've had several agents requesting it be extended to other  
19 crops, and so we're looking at other crops.

20           You know, this is a new pilot. What's most helpful  
21 for us is to get feedback, specifically of how crop policies  
22 work or don't work. So, if you are involved in a policy, if  
23 you can give us examples of what -- what really worked or what  
24 didn't work, it's helpful.

25           Program growth and performance. This just shows that

1 the last 10 years, from 2013 to 2023, the number of policies  
2 have grown. I'm not going to read those numbers off to you;  
3 clearly, there's been a significant amount of growth.

4 The one thing that was talked about throughout the  
5 report is loss ratios, and loss ratios are not good. When  
6 we -- when you look at loss ratios, you at least, for every  
7 dollar being paid out, you want a dollar coming back, so it  
8 really shouldn't be any higher than "one" when you're looking  
9 at being actually sound. The entire program, as mentioned in  
10 the report, is not only are we looking at a loss ratio of one,  
11 we are required by law to have a reasonable reserve, so the  
12 entire crop insurance program loss ratio is at about .88,  
13 generally.

14 So, this is a struggle for us. And as in the report,  
15 a lot of producers talk about T-yields being too low. But,  
16 unfortunately, when we look at this, they're too high. I put a  
17 link in there to an organic report that's on our website. If  
18 you want to go more to specifics in different states, different  
19 crops, and look at what the loss ratios are to see what they  
20 are more specifically, you can do that, but this is something  
21 that -- that we do struggle with because we -- we want to give  
22 producers as much opportunity as we can, we don't have a lot of  
23 data, clearly we don't have it refined as much as we need to  
24 have it refined, and so it's -- it's just going to struggle.

25 This is a map of the organic insurance policies that



1 we had in 2022, as well as the Top 10 insured organic  
2 commodities by liability. You can see they're kind of grouped  
3 there; the darker the color, the more policies there are. You  
4 know, my thought on that is, anytime you have a producer doing  
5 something that is working, other producers start looking at it  
6 and say hey I think I might want to try to do that, and they go  
7 ask questions. and so, you know, I think the more successful  
8 organic farms we have, the more people will start to look at it  
9 and -- and try to get involved.

10           Some changes in initiatives. One thing that was  
11 mentioned in the report are -- were deadlines and timing. One  
12 thing that we did change a couple of years ago is we revised  
13 when a producer must provide a written certificate -- written  
14 certification. We used to require that at Acreage Reporting  
15 Date. Not everybody has that at Acreage Reporting Date, so now  
16 we require that you just show us in writing that you have  
17 requested that. You do have to have it at loss time, because  
18 that's what we will look at when there is a claim filed.

19           Some other notes from the report I just want to  
20 mention. Difficulty obtaining crop insurance with cover crops.  
21 I would -- I'd really like to hear more specifically on that.  
22 In 2020, we made some changes to cover crops and there's three  
23 different ways termination can happen with cover crops now. one  
24 is the zonal guidelines that were there previously. The second  
25 way is if there is published materials, let's say a university

1 or -- or ag experts have published material for the area,  
2 saying this is a way that cover crops can be terminated; that's  
3 one way. Or the third way is that you have an ag expert that  
4 says this is a good way to terminate cover crops. That can be  
5 brought to your agent, to your AIP, and they can take a look  
6 and say, yeah we agree, and it can be insured. So, there's  
7 three different ways. I don't know if that has helped things,  
8 if people realize that yet or not, but I would like some  
9 feedback on it. That third way of getting an ag expert to  
10 provide written documentation on a new way for termination,  
11 I've had people ask question -- ask how that works but I've  
12 never seen anybody actually do it, so maybe somebody will do it  
13 in the future but I'm not aware of anyone that has yet.

14 Also, there was a comment, RMA would like  
15 additional -- or there was a comment, and we would like  
16 additional information on deadlines that they come -- that come  
17 before a producer has time to analyze numbers from the previous  
18 year. Not sure what that was referring to but would be  
19 interested in looking at that.

20 There was a comment, premiums are due in August.  
21 Join the club; nobody likes that. That's legislation, so we  
22 can't do anything about that one.

23 Planting dates. This one we've had a lot of  
24 conversations with organic groups wanting to plant later, and  
25 it's something we want to look more at. This is something that

1 the regional offices look at, and what we -- what RMA is  
2 looking at in the regional offices is they're taking the data  
3 that they have and they're looking at plant dates, and then  
4 they're looking at indemnities. And so, what we need to see is  
5 people are planting later and yields are going up; not people  
6 are planting later, and yields are going down. So, that's  
7 really -- it's been difficult to work through because we'd like  
8 to allow planting dates later. We have a couple of ideas on it  
9 that we haven't worked completely through, but I'm hopeful we  
10 might -- might have something we can do on that in the next  
11 year or so.

12           Also, we worked with AMS. Jenny has been my best  
13 friend. Really appreciate her helping us with things that we  
14 don't understand.

15           And I need to just wrap it up here, and we will come  
16 back to this and start with other efforts. Kind of want to  
17 tell you about what we've done and give you -- talk to you  
18 about some opportunities that might be there. So, for sake of  
19 time and some important announcements, I will just pass it off  
20 to whoever is --

21           DR. TUCKER: Okay, we're going to just stand by for a  
22 minute here. We're expecting a guest in. Let's give Francie a  
23 big round of applause. That was great.

24 (Applause.)

25           DR. TUCKER: And we're waiting. And we're waiting.

1 Let's go ahead, and I think for right now, clear the slides.  
2 We're going to want to project in the room the Zoom thing if  
3 you're able to switch over.

4 We could all stand up and breathe. In the meantime,  
5 I'm going to tell you that we will be posting the RMA slides --  
6 don't go far folks, stay in the room. We will be posting the  
7 RMA slides on the website with everything else. It is always  
8 good to stretch, though.

9 (Pause.)

10 DR. TUCKER: So, Francie you got a good joke?

11 (Laughter.)

12 CHAIR POWELL-PALM: Kim, you got a good dad joke for  
13 us?

14 DR. TUCKER: We didn't want to start the Q&A with  
15 Francie and then introduce -- take a break just because that's  
16 a lot of switching.

17 (Pause.)

18 DR. TUCKER: Okay, find your seats again.

19 Francie, thank you again. Lots of moving parts  
20 today.

21 MS. TOLLE: They probably needed a break from me  
22 anyway.

23 (Pause.)

24 DR. TUCKER: Okay, couple of Zoom challenges on that  
25 end?

1 MS. ARSENAULT: Right.

2 DR. TUCKER: She's having a couple of -- of Zoom  
3 challenges, so it's not us.

4 MS. ARSENAULT: Yeah, just stand by.  
5 (Pause.)

6 DR. TUCKER: Okay, apparently they can hear her.  
7 Okay, so apparently folks can hear her online but not see her.  
8 Oh, there we go. Yay.

9 Good morning.

10 UNDERSEC MOFFITT: (No audible response.)

11 DR. TUCKER: Okay, we can't hear you in the room,  
12 hold on.

13 So, this is, for those who don't know, Under  
14 Secretary Jenny Lester Moffett, Marketing Regulatory Programs  
15 Under Secretary, and it is a pleasure to have you on.

16 UNDERSEC MOFFITT: Yeah, thank -- thank you, Dr.  
17 Tucker.

18 DR. TUCKER: Yay. We can hear you now.

19 UNDERSEC MOFFITT: Okay, great. Well, it is a  
20 pleasure to be here. I'm glad you're all able to hear, and --  
21 and I'm sorry that I'm not able to join you at the NOSB meeting  
22 in Providence this time. It was such a pleasure last year for  
23 the fall meeting to be able to join NOSB at the meeting in  
24 Sacramento. I know there was -- I really appreciated the  
25 questions, the answer -- the engagement, the just really

1 genuine interest, and the work that we're doing at USDA from  
2 the National Organic Standards Board, so sorry again that I'm  
3 not able to be there in person.

4           But I wanted to join you virtually, and swoop in in  
5 the middle of your NOSB meeting, to -- to share some really  
6 exciting news. Today, just in a little bit, we're going to  
7 release and announce -- the Secretary Vilsack is going to be  
8 announcing that we are -- we are moving forward, and we are  
9 rolling out the Final Rule for the Organic Livestock and  
10 Poultry Standards, or OLPS as we call it. This is a really,  
11 really exciting occasion. Something that I want to do first  
12 off, commend NOSB. This has been a long time coming, certainly  
13 through NOSB. And then through the National Organic Program  
14 staff in making this happen. So, I want to thank the -- both  
15 NOSB, the leadership of NOSB over the -- the years, if not more  
16 than a decade, and -- and the works, but also the National  
17 Organic Program staff. This is an exciting time that we are  
18 issuing this Final Rule for OLPS.

19           I think many of you in the room knows what this  
20 means. This means that we are -- we are continuing as -- as  
21 NOSB and -- and all of our organic stakeholders know organic  
22 is -- is continually improving. That is what NOSB is about.  
23 That is what rulemaking is about. That is what the -- the  
24 original tenet of OFA is about; is yes, we have organic  
25 standards, and yes, we know that organic is -- is constantly

1 changing, improving, and I think OLPS and the Final Rule today  
2 is just another example of that.

3           Of course, earlier this year we also issued the Final  
4 Rule for strengthening organic enforcement. So, these rules  
5 are really an important part of continuous improvement, which  
6 is again a core tenet of organic production.

7           So, as you know, these rules are going to establish  
8 clear, strong, and consistent standards for organic livestock  
9 production handling. It's going to level the playing field so  
10 that there is consistent rules that organic livestock farmers,  
11 ranchers, and businesses are -- are following when they're  
12 producing organic livestock and poultry products. It supports  
13 animal welfare through greater outdoor access and more  
14 consistent standard for living conditions for healthcare, for  
15 transport and slaughter of livestock and poultry. It does many  
16 different things, and of course as I talked about, more  
17 consistent standards for outdoor space, more consistent  
18 standards for indoor and outdoor living, more consistent  
19 standard for poultry stocking densities, preventative  
20 healthcare practices, physical alteration and euthanasia,  
21 transport handling and slaughtering.

22           Consistency is key. This is about leveling the  
23 playing field. This is of course something that we've been  
24 talking about, and we've been working on across the department,  
25 making sure that all producers are operating in a fair and

1 competitive -- in a market that is -- is really about  
2 bolstering the bottom line for producers and making sure that  
3 there's a fair competitive market. And also, that consumer  
4 confidence has continued trust that when -- when they buy  
5 something with that green USDA organic seal it means exactly  
6 what they think they're buying. And so that I think is a  
7 really important piece of consumer confidence and trust in the  
8 organic seal.

9           So, one big part, and I know this was discussed a lot  
10 and so I just want to -- to raise it as far as the  
11 implementation timeline for OLPS, there are many different  
12 pieces of it but at most is a five-year implementation timeline  
13 for the furthest out parts of implementation for OLPS, and I  
14 think that's really key. I know we heard a lot from public  
15 comment; we had over 40,000 comments. We really strongly  
16 encourage comments. We've received really robust comments and  
17 I want I think the industry, want to thank everyone who was --  
18 who is part in -- in helping to provide feedback as we develop  
19 these rules, both the Draft Rule last year and then as we got  
20 into the Final Rule, that makes a world of difference in -- in  
21 making sure that we're -- we're hearing from everyone and were  
22 hearing about the pros and cons of different decisions as the -  
23 - as the rule is being made.

24           So that, I think, is all I have to share. The  
25 Secretary, as I mentioned, was going to hop on a press call at



1 11:00 today, so just in a few moments and -- and share this  
2 with -- with the media. I want to thank Chair Powell-Palm  
3 who's also going to join on that press call, so thank you  
4 for -- for agreeing to participate. This is an exciting day  
5 for us. This is an exciting day for the organic industry.  
6 This is an exciting day for NOSB, as we continue to work on  
7 implementing the important conversations, the important  
8 direction, the important guidance that we receive from NOSB  
9 through the rule making process, at the National Organic  
10 Program, this is again, as I said, this is about leveling the  
11 playing field. This is about continuous improvement in the  
12 organic -- in organic production systems, making sure that we  
13 have, and we maintain rigorous and -- and a strong organic seal  
14 that all consumers should feel proud and confident to -- to  
15 look for in the grocery aisle. So, I want to thank you all for  
16 your engagement and we're really excited about this  
17 announcement today.

18 I'll pass it back to you, either Dr. Tucker or --  
19 yeah.

20 DR. TUCKER: So, lots of --  
21 (Applause.)

22 UNDERSEC MOFFITT: And big round of applause to you.  
23 This is -- this has this has really been a long time coming,  
24 and -- and it -- and we appreciate your patience.

25 DR. TUCKER: So, lots of applause in the room here.

1 I'm not sure whether you could hear us or not.

2 UNDERSEC MOFFITT: Thank you.

3 DR. TUCKER: But lots of -- and I can see the  
4 applause coming up on Zoom, so very well received here in the  
5 room. Thank you so much for -- for joining us at the meeting  
6 today.

7 So, in terms of what we're doing here at the meeting,  
8 Nate and I are going to be stepping out for that -- for that  
9 press call, so we will be turning the meeting over into the  
10 capable hands of Amy. And NOP team is in the room, as well.  
11 And I think you're going to pick up with Q&A with Francie.

12 Thank you, Francie, again for being here.

13 And so have a good Q&A session and we look forward to  
14 seeing you on the flip side.

15 Thanks again, Under Secretary, for being here.

16 UNDERSEC MOFFITT: Thank you.

17 SECRETARY BRUCH: All right, just an incredible day  
18 all around. That's a great, wonderful announcement that we  
19 just heard. And we're going to just continue this segment on  
20 crop insurance and then we might take just a short break  
21 because I know everybody is excited to interact with their  
22 communities, as well, on this news that were having, so we're  
23 just going to keep momentum a little bit longer on crop  
24 insurance, see if Francie has anything to finalize with her  
25 presentation, which was wonderful. It was just so powerful to

1 hear all of the improvements and changes and just kind of the  
2 nimbleness of the program that our feedback is really well  
3 received, but we'll have you, if you have anything to finish up  
4 on, and then we'll open it up to any questions.

5 MS. TOLLE: All right. You guys were probably ready  
6 for a -- for a break from me, anyway.

7 So, I'll pick back up where I was with other efforts  
8 talking about our work with -- with AMS and -- and Jenny on  
9 NOP's Integrity Database certificate and utilizing that as a  
10 way for acceptable organic and transitional records.

11 Transitional has been a challenge for us in what we  
12 can have from a grower that's in transition to show they are  
13 actually in transition. So, we're -- this is not perfect, but  
14 it's one way we have identified that we can identify  
15 transitional growers.

16 One of the challenges is -- is, you know, I like to  
17 think that everybody that participates in the crop insurance  
18 program or farmers or whatever are completely honest, but we  
19 don't always see that in any, you know, in any industry, but  
20 that includes agriculture, and so what we don't want to happen  
21 is a producer that is out there, maybe during times when input  
22 costs are so high as they have been, saying, yeah I didn't  
23 apply this fertilizer or this chemical or this pesticide  
24 because I'm transitioning, and get a crop insurance indemnity,  
25 because the last thing we need is for more indemnities to go

1 out the door and those loss ratios -- loss ratios to go up and  
2 the program become more expensive for everyone. So, thoughts  
3 from you guys to really talk about this issue, we would  
4 appreciate any feedback on that.

5           Some other efforts, we have funded four of the last  
6 seven organic surveys with NAS. NAS, of course, just like any  
7 other agency has faced cuts and so forth, so we have provided  
8 \$6 million for them to complete the various surveys. Data,  
9 again, I can't stress enough, that's one of the biggest issues  
10 that we've got, so any ideas that you have on -- for us to get  
11 more data, we are certainly open to.

12           We do have an outreach and education program we call  
13 the Risk Management Education Partnerships. We just announced  
14 just not long ago, six and a half million dollars that we're  
15 providing to partners across the nation. That was for this  
16 last year. But I just pulled up a few -- those that identified  
17 that they were going to work specifically for -- with organic  
18 producers. So, in the last two years: in '22 and '23, the Iowa  
19 Organic Association; in '22 and '23 The Gleaning Network of  
20 Texas; '23, Center of Rural Affairs; '23, Napa Valley Grape  
21 Growers; and in 2022 the Organic Trade Association. And I put  
22 a link there to the RME Program. I would really encourage any  
23 organizations that are out there that can help us reach organic  
24 producers to look at this program and become a partner.

25           The "NO's" from the report, other than producers not

1 wanting or needing crop insurance, the reason for not having  
2 crop insurance is they're unfamiliar with it. You guys that  
3 know the producers and are talking to the producers are going  
4 to get to them far better than we are. So, just think about  
5 this; I wish I lived next to Amy, I might become an organic  
6 grower because she could probably teach me how to do a lot but,  
7 it's --it's the people that know what's going on that -- that  
8 help us move the needle on most everything.

9           The Transitional and Organic Grower Assistance  
10 Program, that's something that we had for 2023. That was one-  
11 time pandemic funding that we used to support organic and  
12 transitional growers. That what we did was offer additional  
13 premium assistance. And for transition -- crops in transition,  
14 we offered an additional 10 percent premium subsidy, so if that  
15 crop or your coverage was subsidized by 70 percent, it was now  
16 subsidized by 80 percent.

17           For organic grain and feed crops, we added \$5 per  
18 acre premium assistance. And then for -- on top of that, if  
19 you had Whole Farm, in addition to any individual policies,  
20 there was a 10 percent subsidy increase, as well.

21           This is preliminary, but what we've seen so far there  
22 were about 4900 produce -- producers that participated, with  
23 9,200 policies, so some producers obviously have more than one  
24 policy. For transitional organic, there was an additional  
25 subsidy paid out of 571,000, and for certified organic there

1 was over 8.4 million paid out to organic grain and feed crops.

2           So, just some things that we have that we're working  
3 on that we've heard requests for. One is allowing more  
4 enterprise units for specialty and perennial crops. Enterprise  
5 units is just a way of ensuring where you're pulling all your  
6 farms together, and because of the diversification in  
7 geography, there's a bigger discount. There's a premium  
8 discount for enterprise units, so it makes crop insurance more  
9 affordable. Anytime we expand the opportunity for enterprise  
10 units to specialty crops or perennial crops, that also means it  
11 goes into organic and transitional crops, as well. We're also  
12 looking at allowing enterprise units for organic farming  
13 practices, which is a request that we received. Also, looking  
14 at offering more optional units; another way to allow producers  
15 to tailor crop insurance more to however their -- their farming  
16 operation is set up and what their risk management situation  
17 is.

18           Also, one of the requests we got from an organic  
19 group was they'd like to see some guidelines out there that  
20 really outline how -- how crop insurance works for organic and  
21 traditional farmers, but all -- and what the requirements are,  
22 but also something agents would have. So, we're working on  
23 those guidelines now, and we're going to be asking for feedback  
24 on this, so I don't know if maybe I can share those with Jenny,  
25 and she can pass those on for you guys to take a look. We're

1 looking at incorporating that so AIPs and agents will have that  
2 to share.

3           Also, the Good Farming Practices Handbook, making it  
4 clear that NRCS Conservation Practice standards are considered  
5 a good farming practice. And let me explain the good farming  
6 practice, how that works for crop insurance. When we say,  
7 "good farming practice," what that means in the crop insurance  
8 world is, let's say you're a producer and you have a claim, and  
9 the loss adjuster comes out and says, you know, I don't think  
10 you followed good farming practices and we're not going to pay  
11 the indemnity. The producer has the right to appeal, and he  
12 goes to the regional office, and say [sic], I did follow a good  
13 farming practice and here's what I did. And so, they provide  
14 whatever information they have that they followed. If it's,  
15 you know, a certain practice for conventional, it might be, did  
16 they put enough fertilizer on, whatever it is; they provide why  
17 they did what they did. The AIP will say, well, this is why we  
18 think that they didn't follow good farming practices. And so,  
19 the -- the regional office will look at both and say, yes we --  
20 we think that the farmer did what he was supposed to do  
21 according to good farming practices and ag what experts would  
22 say, or they will go with the AIP, and then there's appeal  
23 process. That's the good farming practice process that a  
24 producer would work through. So, when we say good farming  
25 practices, it's just not a simple thing. It's a -- it's a

1 process.

2           One of the notes in the report was that there's  
3 discrepancies between NRCS and RMA on what is recognized as a  
4 good farming practice. We -- if you've got specifics that  
5 would really be helpful for us. So, if there's practices out  
6 there that -- that there's been someone that's gone through the  
7 good farming process -- good farming practice process that did  
8 not go well, we'd really like to hear about that. Especially,  
9 if it's an NRCS practice.

10           And with that, I'm finally wrapping up. There's a  
11 lot of information on our website, RMA Local. If you have not  
12 got to know your regional office, I would highly suggest you  
13 do. They're a good resource for lots of things and talk about  
14 T-yields. Planting dates, in particular, go through regional  
15 office. And then there's a -- a lot of tools on our website.

16           And I'm -- I'll be here all day, whatever time we  
17 have now, later if you want to catch me. We also have a -- a  
18 whole team of organic SMEs, it's not just me; we have a good  
19 team of people that spend a lot of time trying to figure out  
20 what our next steps are on organics. So, appreciate the time  
21 and look forward to the conversation.

22 (Applause.)

23           SECRETARY BRUCH: Thank you, Francie.

24           And this -- this is such a relevant topic to our  
25 community. We received a lot of comments from our



1 stakeholders, particularly farmers. Thanks for being a farmer  
2 yourself and understanding our challenges. I think that's the  
3 first step for continuous improvement. And also, if you want  
4 to transition your farms, I'm sure I could help, or there's  
5 several people that wouldn't mind talking to you.

6 So, with that, I'd like to open it up to some  
7 questions from our board. Dilip, go ahead.

8 BD. MEM. NANDWANI: First, like to thank you for your  
9 excellent presentation. A lot of good information. And wanted  
10 to say that I do work with the local or regional office RMA in  
11 Tennessee.

12 MS. TOLLE: Wonderful.

13 BD. MEM. NANDWANI: They have been very helpful. And  
14 with other agencies. I have a question, a clarification, and a  
15 comment.

16 So first, the question, you showed a U.S. map,  
17 country map where we have these green dots, crop insurance, and  
18 we notice that some states and some regions they have more and  
19 some they don't. What could be the possible region [sic] you  
20 think that they are lacking and what can be done? That's one  
21 question.

22 Can I ask -- say the comment also?

23 MS. TOLLE: Sure.

24 BD. MEM. NANDWANI: The clarification, or the second  
25 is, you also mentioned in vertically integrated entities on the

1 new -- on micro farm, so can you tell us a little bit about --  
2 I was talking to Nate while we were waiting for, you know,  
3 Under Secretary Moffitt to talk to us, and here a little bit  
4 mention about this, so. So, vertically integrated entity, is  
5 it about vertical farming? Or is it about soilless farming?  
6 Or what? Can you tell us a little bit more? Yeah.

7 MS. TOLLE: Let me do this one, and then I'll go back  
8 to that slide.

9 And you're asking about vertical integrated entities  
10 that can be insured in micro farm; is that the question --

11 BD. MEM. NANDWANI: Yes.

12 MS. TOLLE: -- now? Okay. All right. First  
13 question on this, you know, I can give you my best guess, but  
14 it's a guess. So, what this map shows is where we have organic  
15 insurance crop insurance policies, so the darker the green the  
16 more insurance policies we have in that particular area. So,  
17 when you're looking at -- at that darkest green, we have over  
18 50 policies.

19 There's probably a lot of reasons, but to me as a  
20 farmer, if I've got somebody around me doing something that's  
21 successful, and -- and literally, me living next to Amy would  
22 be the best example, she's successful and I would be saying,  
23 Amy, what are you doing? And she'd help share that  
24 information, and then I'd have to talk my husband into it.  
25 But -- and so then once you get people talking about it, and

1 doing it, and doing it right -- and that's a key, too; doing it  
2 in a way that's -- is successful for the producer, as well as  
3 your organic community and representing you well, that that  
4 helps spread.

5           Crop insurance agents, where there are none, I'm just  
6 going to take my example. I live in north central Oklahoma.  
7 There's nothing around me. What -- if I went in to talk to my  
8 crop insurance agent, they would have to go research for me  
9 what to do. And so, I want to be able to provide you guys with  
10 enough information to go ask. So, if I were transitioning, or  
11 I were organic, I would take to my agent and say, this is what  
12 I'm looking for and, you know, this is what I want to insure.  
13 These are the things I've read I need; I need your help. And  
14 most will try to help you. There might be a few out there, but  
15 it's an educational process for those agents that don't. We've  
16 really tried to step up the training to the AIPs, as well as to  
17 the agents, to say this is how it works, this is what you need  
18 to be doing. The guidelines that I talked about that were  
19 going to put in one of our handbooks, it will be provided to  
20 that agent, as well as the producers, is another way of us  
21 trying to make it clear this is what you need to be doing, this  
22 is what you need to be looking at. So, I think there's a  
23 responsibility on all levels for people that are doing it, for  
24 us as an agency, to be getting as much information out there.

25           So, I don't know if that exactly answers your

1 question. It's kind of my speculation on all of it.

2 BD. MEM. NANDWANI: No, you did very well.

3 I wanted to very quickly add that there -- there are  
4 two cover crop council if you are aware of that? Southern  
5 Cover Crop Council and Northeast Cover Crop Council. And you  
6 were asking about some more data in your, I think, last slide,  
7 how you can obtain more data, so I would probably add that;  
8 that these two councils, they could be a great tool or resource  
9 to collaborate with them. And I'm part of the -- on their  
10 board, also. Probably I will mention to them to work on and,  
11 of course, email.

12 In Tennessee, also when I go back to do something  
13 about these crop insurance, to collect more data, but SEC and  
14 MESCC, they are available, and we can convey them to work on  
15 these -- collect some, you know, help on this more data.

16 MS. TOLLE: Okay.

17 BD. MEM. NANDWANI: But thank you again for your  
18 excellent presentation. I don't know if you want to say  
19 anything on vertically.

20 MS. TOLLE: Let me back up to your other question  
21 on -- I think you were asking about -- allow vertical  
22 integrated entities.

23 BD. MEM. NANDWANI: Right.

24 MS. TOLLE: So, micro farm, previous to this year, we  
25 did not allow vertically integrated entities for the primary

1 reason we're insuring small farms up to 350,000, 400,000 if  
2 they're carryover insured. What we didn't want to see happen  
3 was very large entities start breaking up into different  
4 entities so they could apply for micro farm. But we decided  
5 there was enough of a request for those legitimate people that  
6 are vertically integrated, throughout the process we're just  
7 going to do it, and so we just did it. It was -- it was a big  
8 request that we got, and so we'll monitor it, but just another  
9 thing that we put out there for this year.

10 BD. MEM. NANDWANI: Thank you very much. Thanks  
11 again.

12 SECRETARY BRUCH: Okay, Dilip. Allison, go ahead.

13 BD. MEM. JOHNSON: Thank you, Francie. This is very  
14 interesting, and I'll have to admit, over my head in a lot of  
15 spaces, so I may have some questions that ask you to reiterate  
16 points that you already made.

17 This question, I -- I think you already partly  
18 answered, but I've heard that in Texas it's hard to find or  
19 maybe impossible to find Whole Farm policies. So, for a  
20 producer in a location where there's no one offering the type  
21 of policy that they need, what should they do?

22 MS. TOLLE: So, No. 1, they should be offering it.  
23 There are agents that are more familiar with it than other  
24 agents are, for sure. So, if you can't -- we don't have a  
25 resource that says, okay, this agent provides Whole Farm, this

1 one doesn't. They -- like I said, they all should be, but if  
2 somebody is really -- just can't find someone, contact the  
3 regional office and we'll see if we can help.

4 BD. MEM. JOHNSON: Great. Thank you.

5 MS. TOLLE: Or e-mail me. You guys are going to all -  
6 - don't e-mail me everything, but if you have a question, you  
7 do have my email.

8 BD. MEM. JOHNSON: Okay, thank you. And you had a  
9 few slides that had acreage, some that had policies, and I  
10 think the TOGA slide had, actually, number of operations  
11 participating, and I'm wondering if you can speak to operations  
12 participation in Whole Farm? Are we seeing increases in  
13 acreage for organic and in numbers of operations that are  
14 accessing crop insurance policies? Or do you have a sense of  
15 how that breaks down?

16 MS. TOLLE: So, Whole Farm is just one way that  
17 someone can insure their operation, and it's not for everyone.

18 Is this the one you were talking about, maybe?

19 BD. MEM. JOHNSON: Yeah. This one, and then  
20 comparing later to TOGA --

21 MS. TOLLE: To TOGA.

22 BD. MEM. JOHNSON: -- where you did have number of  
23 operations in addition to policies.

24 MS. TOLLE: Okay. All right. So, the program has  
25 grown quite a bit. What's not separated out here to your

1 specific question is how many of these policies are Whole Farm  
2 versus individual type policies, and I think that's maybe what  
3 you were trying to get to?

4 BD. MEM. JOHNSON: More how -- can we assume that  
5 number of policies is equivalent to number of operations? And  
6 are you seeing more operations overall take advantage of crop  
7 insurance opportunities as that acreage is growing? Or is it  
8 maybe that a similar number of farms are participating but they  
9 have more acreage?

10 MS. TOLLE: Um-hum. So, for example, on the TOGA  
11 slide, and we can go back to it here in a little bit, there was  
12 something like 4,000 producers and 9,000 policies. So, if I'm  
13 growing corn, Wheatley, and sweet corn -- well, sweet corn  
14 might fall under corn. If I was growing two or three different  
15 crops, I'll have two or three different policies. Amy probably  
16 has more than one policy, I'm assuming. So, one producer might  
17 equal two or three policies, so when you're looking at this and  
18 it says we've got certified organic 10,000 policies, that could  
19 be 3,000 producers. I don't know for sure. Could be 4,000.  
20 But it's not going to be 10,000. I promise you.

21 So, does that help? Did I get to what you were  
22 asking?

23 BD. MEM. JOHNSON: Yeah. And there was a slide a few  
24 before this that showed the growth in acreage that was pretty  
25 significant, that just had acreage, and I wonder --

1 MS. TOLLE: Okay. So --

2 BD. MEM. JOHNSON: -- if you have -- down there?

3 MS. TOLLE: Um-hum, for that one -- this one? Okay,  
4 so these are supplemental policies, that when I talked about  
5 producers have a choice of getting an individual crop policy,  
6 so I'm going to buy specifically for my corn -- and I know I  
7 keep using that, this as the simplest one -- I've got a  
8 insurance policy specifically for corn. I've also -- what  
9 everybody likes to talk about is Whole Farm, and that's great  
10 for really diversified, if there's not an individual -- but  
11 there's a lot of people buying individual policies, and when  
12 you buy an individual policy ,like I said, you're deductible --  
13 you might buy 70 percent coverage, which means 30 percent of  
14 the value of the crop if you have a loss you're covering  
15 yourself. And so, these supplemental policies, which are  
16 generally area based, you have an opportunity to purchase as a  
17 producer to help fill that gap up to 0 or 95 percent. So,  
18 these would be on individual crop policies. They're not on  
19 Whole Farm; this would just be, say, on that corn policy. So,  
20 Enhanced Coverage Option would go up to 90 or 95 percent;  
21 Hurricane Insurance goes up to 90 percent; Supplemental  
22 Coverage Option up to 86 percent; STAX up to 90 percent. This  
23 shows the number of acres that are transitional or organic that  
24 are covered by these various policies, specifically for organic  
25 or transitional. So, Enhanced Coverage Option goes up to 90,



1 95 percent; that one has really taken off for a lot of  
2 transitional organic. I have not analyzed this before I say  
3 what I'm going to say; if I were guessing, it's going to be in  
4 the Midwest in the ice states and on grain crops is where I'm  
5 going to guess that's going on.

6 BD. MEM. JOHNSON: But do you have a -- a breakdown  
7 of how these acres map to number of operations?

8 MS. TOLLE: Not right off.

9 BD. MEM. JOHNSON: Okay.

10 MS. TOLLE: I mean, that's something we could  
11 probably look at, but I don't right off. I just wanted to kind  
12 of show there -- when we have policies for conventional crops,  
13 most of those are also available for transitional organic, so  
14 we've got other things, too. Quality Loss Option, those are --  
15 not going to go in that, gets way in the weeds -- those are  
16 available for transitional and organic farmers. So, I don't  
17 have that right off if.

18 If -- if there's really a need for data, and I think  
19 maybe there might -- there might be some more observations on  
20 or wanting to look at specific data, we can -- we can pull that  
21 for you.

22 SECRETARY BRUCH: Thanks, Allison.

23 Yeah, go ahead, Logan.

24 BD. MEM. PETREY: Yeah. Hey, thank -- thank you.

25 All right, question; why is the loss ratio greater in

1 organic than in transitional?

2 MS. TOLLE: There's more losses. I mean, it's --  
3 there's --

4 BD. MEM. PETREY: I mean, that's -- I didn't know if  
5 it was the premium you were paying was less, and so the --  
6 like, for -- because if I was an organic grower, I would say my  
7 losses are probably higher in transitional than they are in  
8 organic. we've seen losses -- yield losses less in  
9 transitional than we have in organic because it does take time  
10 to really --

11 MS. TOLLE: Sure.

12 BD. MEM. PETREY: -- get that system to be organic to  
13 where it is benefiting. And so, I saw the -- the loss was --  
14 was higher, and -- or higher in organic than in transitional, I  
15 didn't know if that was because of the premium that you're  
16 paying for that is less, so therefore, it is less on the  
17 government, but it's probably higher, maybe its higher on the  
18 grower? I don't --

19 MS. TOLLE: So, I think to answer that question,  
20 you'd have to look more specifically at the crops and the  
21 locations.

22 BD. MEM. PETREY: Um-hum.

23 MS. TOLLE: You know, I don't know right off if  
24 they're grown in the same place? Is it the same weather  
25 events? Is it more transitional versus organic in certain

1 areas, and so indemnities are, you know, based on weather  
2 events? What happened with that weather event? Where?

3 BD. MEM. PETREY: Um-hum.

4 MS. TOLLE: So, I think you'd have to do a deeper  
5 dive into the numbers and the crops to see exactly why that is.

6 You know, like I said, this is the most challenging  
7 for us because we hear T-yields are too low. This tells us --

8 BD. MEM. PETREY: Right.

9 MS. TOLLE: -- the opposite of that.

10 BD. MEM. PETREY: Right.

11 MS. TOLLE: But we just don't want to rip the carpet  
12 out from everybody.

13 BD. MEM. PETREY: Sure.

14 MS. TOLLE: We're trying to figure out what's going  
15 on.

16 BD. MEM. PETREY: Especially with the transitioning  
17 happening.

18 MS. TOLLE: Yes. It's happening.

19 BD. MEM. PETREY: Another follow-up question with  
20 transitional. So, when do you have to identify that is  
21 transitional? Just stating on when you made a comment that  
22 knowing in -- in hard times, maybe they didn't put an input and  
23 they're saying, well, I'm in transition now. So, are -- is  
24 that when that you're able to say that that it's covered, and  
25 it's put under this transitional loss ratio?

1 MS. TOLLE: So --

2 BD. MEM. PETREY: Or does it have to be --

3 MS. TOLLE: -- by Acreage Reporting date, you have to  
4 show us that you have -- that you have talked to a certifier,  
5 and that you --

6 BD. MEM. PETREY: Okay.

7 MS. TOLLE: -- are in -- in the process of doing  
8 that.

9 When you have a claim, you're going to have to  
10 provide something from -- and the -- the Integrity Database is  
11 a place we're hoping we can work with transitional growers,  
12 specifically, because they don't have an organic systems plan,  
13 what do they have? And that's what I'm kind of hoping you guys  
14 can help us with --

15 BD. MEM. PETREY: Sure.

16 MS. TOLLE: -- what else can we get from them to show  
17 they're doing that?

18 BD. MEM. PETREY: Right. And -- and things like that  
19 would be, you know, what seed are you planting? Because  
20 there -- there's, you know, there's quite limitations on that.  
21 It can't just be an application, not made at the very end, to  
22 consider a transitional.

23 MS. TOLLE: Correct.

24 BD. MEM. PETREY: So, okay, great. Thank you.

25 SECRETARY BRUCH: Thanks, Logan.

1           Go ahead, Carolyn.

2           MS. DIMITRI: Great. Thank you so much for this  
3 great, great conversation, Francie. I have two questions.

4           The first one is about the new guidance that you are  
5 developing for crop insurance agents and AIP. I don't -- the  
6 AIP people. How will you measure the efficacy of those? Like  
7 will you -- like how do you know they're going to work? Are  
8 you going to follow up with them? Will you give the agents a  
9 test to see their organic knowledge? I mean it's great to have  
10 it, but how do you know that it will be used, and it will be  
11 helpful?

12           MS. TOLLE: So, once we put something in procedure  
13 it's part of compliance reviews, so we'll be asking them. Can  
14 some slip through? I mean, anything can slip through anywhere,  
15 but it will be to their advantage because what's the  
16 disadvantage of not giving it to the -- the producer?

17           We have requirements, not just on these guidelines,  
18 but different, all types of things that the producer is  
19 supposed to be provided information. You know, is everything  
20 perfect? No. But without it, we don't have anything.

21           MS. DIMITRI: I don't understand what a compliance  
22 review is, sorry.

23           MS. TOLLE: So, there's -- there's two different  
24 things when I talk about compliance.

25           Number one, RMA has a complete division that is

1 compliance, so AIPs are pulled for various compliance reviews  
2 every single year. So, when they go out and look at the  
3 process from the AIP to the agent to the producer, what  
4 happened in certain situations, they're reporting back findings  
5 to the AIP, as well as to RMA, and we will expect them to make  
6 changes based on anything that was not done according to  
7 procedure or policy. So, it's a -- it's a complete division  
8 and RMA is -- just to give you a little bit of idea what our  
9 agency is -- compliance is about a third of the agency, of the  
10 490 employees that I talked about, there's about a third of  
11 them are compliance.

12 Third of them are regional offices, and regional  
13 offices are looking at and talking to people about how things  
14 are working right now. What's working? What's not working?  
15 Product management, where I am, is the other third, and we're  
16 developing or modifying policies. So, product management is  
17 looking at the future, how are we going to change things?  
18 Regional offices are looking at what's going on right now, what  
19 are these T-yields doing? What's plant dates looking like?  
20 Compliance, hopefully you don't talk to compliance. They're  
21 going to make sure everything is done correctly.

22 MS. DIMITRI: But at the very minimum, you would  
23 expect to see more organic crop insurance policies? So, I  
24 mean, like will you look at that data in that particular way?  
25 Like I don't know how you measure success.

1 MS. TOLLE: I don't know that that's going to be a  
2 way to measure success, because that's going to be given to the  
3 people that --that come in, are looking for organic insurance.

4 I -- I guess if you were asking me what's a better  
5 measurement, it would be to look at our RME partners and the  
6 money that we're putting out there with different partnerships  
7 to see if our -- our message is getting out? Is it -- are  
8 people actually coming in and requesting crop insurance? Is  
9 the survey in the study, is that moving that needle at all?  
10 Are people more aware of it? Because one of the biggest things  
11 that I saw in there was producers aren't familiar with it; how  
12 do we get them familiar with it? And so those RME  
13 partnerships, of course, that way. Regional offices that are  
14 out there talking to different producer groups. But I'm open  
15 to ideas on what's a better way, but it -- honestly, the  
16 guidelines are not going to be a good measurement.

17 MS. DIMITRI: Okay. Great. Thank you.

18 MS. TOLLE: That was a long answer --

19 MS. DIMITRI: No --

20 MS. TOLLE: -- to the guidelines are not a good  
21 measurement.

22 MS. DIMITRI: No, I mean, it's helpful to know  
23 because you put something out with an intention, and then like  
24 how do you know that it is achieving the goal? Because you're  
25 not doing it just for fun.

1 MS. TOLLE: No. The intention of the guidelines is  
2 to make sure everybody fully understands what the requirements  
3 are to be transitional and organic, and there's not confusion  
4 out there about that.

5 MS. DIMITRI: Great. Thank you.

6 Now, I have like a more big picture question. I  
7 mean, just thinking about climate events are increasing in  
8 number, like how is your agency positioned to weather that --

9 MS. TOLLE: Excuse the very funny joke again.

10 MS. DIMITRI: -- going ahead? I mean, I think like  
11 these problems will become more severe for organic farmers  
12 and -- and conventional farmers, and I just wonder, do you just  
13 keep on going and you just take every year as it comes? Or do  
14 you have this long-range planning?

15 MS. TOLLE: I mean, there's different things that  
16 we -- different practices that we look at, different crops  
17 that -- are -- are there crops that don't require as much water  
18 in certain areas, that do we have enough data to provide our  
19 crop insurance program so that people that can't or don't want  
20 to use as much water can have an insured crop? Different  
21 practices that help get into rotation, double cropping for  
22 example, is that practice available so people can rotate?

23 So those are kind of things we look at. We are still  
24 heavily dependent on data, so it's challenging in some regard.  
25 We had the Pandemic Cover Crop Program that encourages the use



1 of cover crops; that was funding for only two years. I know  
2 there's interest in Congress to do that program again through  
3 legislation, and -- and maybe they will. That's a way for us  
4 to collect data to see if different practices are being -- are  
5 helpful regarding loss ratios, because we don't -- we don't  
6 have enough information right now.

7 So, there's a lot of little pieces going on, but  
8 not -- there's no snow -- silver bullet, for sure.

9 MS. DIMITRI: Okay. Thank you. That is interesting,  
10 because it's like how do you reduce the variation in production  
11 through these other practices so you can actually encourage  
12 that by the way you write policies. Thank you so much.

13 SECRETARY BRUCH: Thanks, Carolyn.

14 Kim, go ahead.

15 BD. MEM. HUSEMAN: Thank you.

16 And thank you, Francie, for all of this information.  
17 My question, you touched on that when you were responding back  
18 to Logan, I believe, but I know you talked about the Organic  
19 Integrity Database, but can you also expand just on the RMA and  
20 the NOP collaboration and that partnership a little bit more?

21 MS. TOLLE: So, I guess the best way to explain our  
22 relationship is just keeping an open dialogue on what each one  
23 of us are doing.

24 Jenny, obviously, has a connection with you guys that  
25 I don't have. I would not be sitting here if it weren't for

1 Jenny, probably. So, when we have an issue or we have an  
2 organic group that comes to talk to us and says we have a  
3 problem with, transitional was a great example; how can we work  
4 together to bridge that gap? So, just -- I guess the best way  
5 to describe it is just keeping in continual contact with each  
6 other and talking about the issues that are raised. Jenny may  
7 hear something here that she'll come to us and say, hey, I  
8 heard whatever; can you help me explain what's going on? Or is  
9 it a problem? Can we work on it together? So, that  
10 relationship is very important.

11 BD. MEM. HUSEMAN: Thank you. And another follow-up  
12 to that, maybe a little bit more granular; can you go back to  
13 the slide that that showed the price levels for corn, I think  
14 is an example here.

15 MS. TOLLE: Yeah.

16 BD. MEM. HUSEMAN: And just, you know, as we talk  
17 about transition being an implementation, is there any thoughts  
18 around adding in a price factor for transition prices versus  
19 conventional and organic?

20 MS. TOLLE: No. But if you have suggestions or  
21 thoughts on that, we would be willing to listen.

22 BD. MEM. HUSEMAN: All right, thank you.

23 MS. TOLLE: Let me -- let me let me ask one more  
24 question on that. So, what would -- do you have a vision for  
25 maybe what that would look like or?

1           BD. MEM. HUSEMAN: No. I -- I don't at the moment.  
2 I just -- it stemmed based -- I just think that that is another  
3 gap, as producers have explained, and when we talk about some  
4 of these pricing models that that's -- I don't today.

5           MS. TOLLE: Okay.

6           BD. MEM. HUSEMAN: But I -- I think it's just worth  
7 noting and gives us something more to -- to work on, too, and  
8 to bring back more information.

9           SECRETARY BRUCH: And one thing I do know about  
10 transition, transition producers can use the contract price  
11 addendum. So, conventional producers can't use that feature,  
12 but if you have a contract that's above the RMA price, as a  
13 transition producer, you can show that and get that stepped-up  
14 price. So, there's a -- a nice intermediate solution right  
15 now.

16           BD. MEM. HUSEMAN: Okay.

17           SECRETARY BRUCH: Okay, we'll go to Nate, Jerry,  
18 Kyla, then me, and then we'll wrap it up. This has been  
19 extensive, thank you.

20           BD. MEM. LEWIS: One of the issues that organic  
21 producers struggle with, and it kind of varies from state to  
22 state, is losses due to pesticide drift, and oftentimes that  
23 sort of misapplications and they may be out of luck with RMA  
24 because that's not a weather-related event. But we're also  
25 seeing increases in trace amounts of pesticides just in the

1 rainwater and contaminating crops and loss of organic premiums  
2 due to that through export markets.

3 Do you see any sort of avenue through the Quality  
4 Loss Program? Or some other avenue where we could maybe bridge  
5 some of those gaps in coverage due to, you know, a loss of  
6 quality, which results in a loss of organic premium?

7 MS. TOLLE: Not at the moment. That is one of the  
8 hardest things to deal with. And when you talk about -- you're  
9 talking about pesticide, but just drift in general for  
10 agriculture across the Board, is one of the most difficult  
11 things we deal with because, you know, even conventional  
12 farmers are asking us the exact same question. I've had the  
13 same issue on my farm.

14 BD. MEM. LEWIS: Um-hum.

15 MS. TOLLE: Somebody sprays dicamba and -- list. Big  
16 problem. My beans are dead. You guys are losing your  
17 certification. The problem is that, you know, it's -- it  
18 starts man made, and how do I know that Francie didn't spray  
19 because Nate thought he was going to have some sort of loss and  
20 he needs, you know -- you're welcome, you get an indemnity.  
21 You know, most people don't think like that. Most people don't  
22 do that. But compliance, we find that some people do.

23 So, how do we deal with that? You brought something  
24 interesting, quality. So, when -- with what you just said, is  
25 it -- are -- are you losing certification or are you losing

1 quality?

2           BD. MEM. LEWIS: Both scenarios occur. And -- and  
3 depending on what state you're in -- you know, I -- I come from  
4 Washington State, and we've got robust laws around applicators  
5 insurance, so if someone misapplies you can usually get a  
6 indemnity from a --from a, you know, the company's insurance  
7 provider for loss of that year's crop or up to three years  
8 losses if you lose certification. But not all states are like  
9 Washington with -- with something like that. And so, sort of  
10 thinking about it, I think both scenarios occur, and it -- it  
11 sort of happens all -- you know, it -- it depends on the  
12 specific situation. Is it flame retardant from fighting a  
13 wildfire? That's been an issue in Washington and other states.  
14 Is it glyphosate in rainwater? Which I know is, in the  
15 Northern Great Plains, is a major issue for trying to get your  
16 specialty crop -- specialty grain crops to Europe, those types  
17 of markets.

18           So, it's kind of all across the Board, but I'm just  
19 trying to explore ways that we can create a national approach  
20 to it, as opposed to leaving it state-by-state because it's --  
21 that's not working right now, and kind of a national way to  
22 address it would be great. And insurance coverage seems to be  
23 the logical tool, but I also acknowledge what -- the issues you  
24 bring up around fraud, and -- and the challenges that are --  
25 that are posed there.

1           So, it sounds like it probably is an act of Congress  
2 sort of issue at this point to give you all some more leeway in  
3 creating programs for that?

4           MS. TOLLE: Um-hum.

5           BD. MEM. LEWIS: But I'm curious what your reaction  
6 is to that?

7           MS. TOLLE: It's a problem. It's a difficult problem  
8 to solve, and it's something that we've got in a lot of areas  
9 with a lot of different types of producers, so I appreciate any  
10 thoughts you can come up with. A national approach would be  
11 interesting.

12           I mean, I'm sitting here thinking, okay, my Oklahoma  
13 laws are a little bit different than what you just stated, and  
14 I live right on the Kansas border, and I know those are  
15 different as well. It's a difficult problem. And I hate to  
16 say, let's keep thinking about that, but we really need some  
17 help thinking about that because it's difficult.

18           BD. MEM. LEWIS: Fair enough. I appreciate the  
19 openness to --to the conversation.

20           SECRETARY BRUCH: Thanks, Nate.

21           Go ahead, Jerry.

22           BD. MEM. D'AMORE: I, too, thank you and I, too, will  
23 plead a little bit of ignorance about the whole broad topic of  
24 insurance.

25           I beg your pardon?

1 BD. MEM. JOHNSON: Me, too.

2 BD. MEM. D'AMORE: Okay. I'm intrigued by the slide  
3 that has the continental United States shown, if I could see  
4 that for a second?

5 And while you're looking for it, I'm intrigued  
6 because it's -- it's way too geographically specific not to be  
7 giving you more information than I think you're getting. So,  
8 as I look at it, I see perhaps eight geographic clusters, and  
9 those geographic clusters indicate to me perhaps crop types.  
10 And so, then the question I have for you is, are there crop  
11 types that find this program more beneficial to them than  
12 others?

13 MS. TOLLE: That's a good question. And, too, when I  
14 was looking at this just for this presentation, I pulled the  
15 NAS data to see where the crops were, regardless of if they're  
16 insured, and they follow this as well. So, it would be  
17 interesting maybe in research to overlay those and -- and start  
18 drawing some conclusions that way, as well.

19 I will tell you that conventional farmers, crop  
20 farmers that go into transitional organic, are the first ones  
21 to get crop insurance because they're most familiar with it.  
22 So, when you get into the specialty crops, that's where it  
23 takes a lot more outreach because they're not familiar with  
24 crop insurance at all.

25 Does that help?

1           BD. MEM. D'AMORE: It helps a lot. And, you know,  
2 specialty crops are my wheelhouse, so that's -- yes. Thank you  
3 very much.

4           MS. TOLLE: Okay.

5           SECRETARY BRUCH: Go ahead, Kyla.

6           MS. SMITH: I just wanted to make a comment, in  
7 that -- regarding the -- what Logan was asking about, and how  
8 to verify a producer's tradition -- or transitional claim. And  
9 so, Jenny, in her presentation yesterday, I believe, had  
10 mentioned that -- some work that the Accredited Certifiers  
11 Association did to create a transitional like pre-OSP, if you  
12 will.

13          MS. TOLLE: Yeah.

14          MS. SMITH: And so that tool, along with -- there was  
15 a memo that was sent out to certifiers to utilize the Integrity  
16 Database, so those tool -- two things together I -- I believe  
17 should hopefully address the concerns that you were raising  
18 here about how to actually verify those producers.

19          MS. TOLLE: Well, I'm glad to hear you say that,  
20 because we hope so, too. But I'm also aware that nothing's  
21 perfect. But we worked with jenny a lot, and that -- the memo  
22 and everything you just talked about was several months' worth  
23 of work to try to get to that point, and I hope it does help.  
24 But also realize there's probably a little more work to do, but  
25 if you've got feedback regarding that, I sure would like to



1 hear it.

2 MS. SMITH: Great. Thanks.

3 SECRETARY BRUCH: Thanks, Kyla.

4 Okay, I have one last question, and then we'll wrap  
5 this session up. Thank you so much for entertaining all our  
6 questions. Mine is on quality, and I'll try to keep it not  
7 down into the weeds, because I can get there pretty fast.

8 But I do think -- I love that we're considering  
9 organic by practice for the -- or enterprise units versus  
10 operational so folks aren't aggregating mixed production  
11 operations. I think that will be a big win for organic  
12 producers.

13 But one next, I think, stone to kind of look at would  
14 be the quality issue. We kind of talked corn in some of the  
15 examples. Right now, there are standards for loss adjusting in  
16 quality, but it doesn't necessarily kick into Grade 4 or 5  
17 which, is all looking at feed-grade type conventional  
18 counterparts. So, I think, you know, a lot of our -- why we  
19 get contracts is because we deliver a Grade 1 or a Grade 2 type  
20 quality, so I think if there could be an additional factor with  
21 the contract price addendum to include a quality metric, as  
22 well, so that -- so it matches our contract essentially, I  
23 think would be super helpful. Because otherwise, we could get  
24 in a situation, and I have several times with blue corn, where  
25 I don't have a feed-grade outlet for blue corn, so if I don't

1 hit my contract spec of Grade 1 due to a hailstorm, I'm still  
2 going to be above the Grade 4, so I don't get any quality  
3 compensation either on my crop insurance.

4 So, there's kind of this purgatory zone, I guess,  
5 between Grade 4 is where the level starts kicking in for  
6 quality. So, sorry, more of --

7 MS. TOLLE: Yeah.

8 SECRETARY BRUCH: -- a comment or a -- an additional  
9 point --

10 MS. TOLLE: No, you're right.

11 SECRETARY BRUCH: -- but I -- but I think it -- it  
12 could also impact conventional producers, and I've talked to  
13 the corn -- Corn Board about this, about trying to rally in a  
14 broader type of audience because I know there's conventional  
15 producers that are also growing food-grade type corn, and they  
16 would be in a situation that's very similar, where there's just  
17 a -- a little bit of a purgatory zone between the quality kick-  
18 in standard.

19 MS. TOLLE: So, specifically for food quality or  
20 organics, I think what we -- what we'd be looking for is what  
21 are those quality levels that we could set in the policy?

22 For example, for conventional -- most -- most  
23 commodities, just let me generally say have discount factors,  
24 and producers don't agree with those, and we have a contracted  
25 study right now to look at that. That factor is a national

1 factor, and really it should be more probably regional, and so  
2 the contract that we're looking at is how far can we bring it  
3 down to the local level? Because everybody knows when there's  
4 a weather event, then warehouses or delivery points start  
5 making different -- they don't want the -- yeah, the quality  
6 changes, and so it doesn't fit our national quality.

7           And, you know, a long time ago, we had whatever the  
8 producer got for quality, you know, if it was below, that's  
9 what we would pay quality on. Well, then we had elevators  
10 start listing at insurance price and a non-insurance price;  
11 that doesn't work so well, either, and so there's a big balance  
12 between where do we get the quality standards? And so, we are  
13 looking at that -- that contract for our national quality  
14 factors now. But you're bringing in a whole other area, which  
15 we do need to look at. I don't know where we get those quality  
16 factors.

17           And if anybody here can help with that, that would be  
18 great, because that's a big issue. And it's not the same for  
19 everyone, like you just mentioned. So, if you've got ideas,  
20 we're willing to listen.

21           SECRETARY BRUCH: Well, thank you for your extended  
22 time during this session, and just your willingness to -- to be  
23 flexible and work with us.

24           I think next steps from our Subcommittee working on  
25 crop insurance is trying to find solutions or ideas that could

1 be wins for farmers, but also wins for Risk Management Agency,  
2 so it's mutually beneficial, I guess, in the long run. But I  
3 really appreciate your outlook, and philosophy, and time, and  
4 we'll continue the discussions then. Thank you.

5 (Applause.)

6 SECRETARY BRUCH: Okay, why don't we take a quick 15-  
7 minute break, and then we're going to dive into our CACS  
8 agenda. We have four topics to discuss when we come back from  
9 the break. Thank you.

10 (Whereupon, a brief recess was taken.)

11 CHAIR POWELL-PALM: All right, folks, my fellow  
12 NOSB'ers, please take your seats. We're going to get going  
13 again. We're still going to break for lunch at 12:45, but  
14 we're going in a -- in the best way -- we're never running  
15 behind on this board, we're exactly where we should be, but  
16 were going to have to make up some time, so were going to try  
17 to be brief in our comments.

18 I'm sorry, Francie, for having missed the Q&A because  
19 it sounds great. Thank you again for being here. Really  
20 appreciate this. It's huge for our communities. We'll hear  
21 from you.

22 I'm going to hand it over to Carolyn to kick off the  
23 Discussion Document: Oversight Improvements to Deter Fraud --  
24 oh, I apologize, Discussion Document: Organic and Climate-Smart  
25 Agriculture: Climate Induced Farming Risk and Crop Insurance.

1 Floor is yours.

2 MS. DIMITRI: Okay, great. I want to tell everyone  
3 I'm brain dead. I feel full of crop insurance information, and  
4 I think that we covered a lot of the information already in  
5 the -- Francie's talk and then the Q&A, so I'm going to be  
6 super brief here.

7 And I guess maybe what I would like to just jump into  
8 and hopefully people are okay, with this is maybe to talk about  
9 the next steps for this document, and where we want to go from  
10 here.

11 I think we've heard RMA had -- is making some  
12 changes. RMA identified -- Francie identified a couple of  
13 places where she wanted more information. I made a note of two  
14 of them, and most of them have to do with specific evidence to  
15 back up some of our general statements about discrepancies. I  
16 can't find them here in my notes, but I'm sure -- I'm sure I  
17 have them and I will listen to the transcript.

18 So, I -- Amy, are you okay with turning this over to  
19 a what -- where do we go from here with this document?

20 SECRETARY BRUCH: Yeah, absolutely.

21 MS. DIMITRI: Okay. So everyone, where do you think  
22 we should go from here with this document?

23 CHAIR POWELL-PALM: Questions for Carolyn?

24 MS. DIMITRI: I have my -- I -- I'm just curious what  
25 people -- what people think are some good next steps?

1 UNIDENTIFIED SPEAKER: (Indiscernible).

2 MS. DIMITRI: Yeah. Well, why answer a question if  
3 someone else can do it for you?

4 CHAIR POWELL-PALM: Allison, please go ahead.

5 BD. MEM. JOHNSON: If it was law school, you would  
6 have just cold-called on me so, I appreciate this venue.

7 MS. TOLLE: That's right.

8 MEM. JOHNSON: I heard a few areas that Francie named  
9 that RMA is really wrestling with where there are opportunities  
10 to serve organic producers more effectively, and to me that's a  
11 good place to focus our attention.

12 One area that stood out is how to demonstrate that a  
13 producer is in transition in a way that provides some assurance  
14 against fraud, but also isn't cumbersome for transitioning  
15 producers or beyond the requirements under OFA. So, it sounds  
16 like some sort of interaction with the certifier is what RMA is  
17 looking for now. There may also be transitioning producers who  
18 haven't yet started that relationship but may be participating  
19 in the TOPP program in some capacity. Or Logan mentioned  
20 buying organic compliant seed. Things like that might be other  
21 factors that we could look to, so starting to gather up some of  
22 those options and -- and present suggestions to the RMA I think  
23 is one place to focus.

24 Another, oh, was I appreciated Francie's openness to  
25 feedback, and I was sort of thinking through on the break how

1 can we make that really accessible to producers, helping them  
2 with what's there, so suggesting that there be some sort of, I  
3 don't know, clearing house or one point of contact where  
4 producers who are encountering specific challenges, say with  
5 NRCS and RMA requirements coming into conflict or not having  
6 access to the crop insurance options that they need, if there  
7 is one place for them to go, that might be a -- a  
8 simplification or a -- a streamlining way where we can start to  
9 address some of the challenges that are coming up. So, those  
10 are the first things that came to mind for me.

11 MS. DIMITRI: Great. Thank you.

12 CHAIR POWELL-PALM: Nate.

13 BD. MEM. LEWIS: Oh, I can imagine that crop  
14 insurance will continue to have challenges for producers.  
15 We're not going to sort of clear it all up with this one  
16 document, so perhaps laying some -- some foundations for future  
17 boards to replicate this effort and continue the conversation  
18 with RMA. I think we function as a good clearinghouse for both  
19 hearing from RMA about areas you're interested in addressing,  
20 and also from producers and sort of synthesizing that  
21 conversation. So, if we can set up future boards for success  
22 in this conversation, that would be really helpful.

23 DIMITRI: Great. Thank you.

24 SECRETARY BRUCH: Yeah, I think it was awesome and  
25 wonderful to hear on some of the improvements that are up and

1 coming, such as organic by practice, looking at enterprise  
2 units versus operational. We've heard a lot of feedback from  
3 our producers through written comments, oral comments on that  
4 particular issue, which is really just invigorating to know  
5 that, you know, we can find solutions to some of these  
6 challenges.

7           So, on the short list -- the short, aggregated list  
8 that we have heard from producers and articulated in the  
9 document, I'd like to see if we could advance some of those  
10 items a little bit further, stress test them to -- to push the  
11 community for some solutions that could advance even more of  
12 the challenges to a solution-oriented outcome.

13           So, that's -- and I think we labeled maybe five or  
14 six of them, so maybe we can pick a couple of them and at least  
15 make some progress on those. That would be amazing.

16           MS. DIMITRI: Great. Excellent.

17           CHAIR POWELL-PALM: I apologize for having missed the  
18 conversation, but I think that something that still sits top of  
19 mind for me, is how we can be more organized in getting data  
20 sets to RMA and having producers start growing crops now that  
21 they might want to ensure in the future and figuring out how to  
22 do that in a more organized way. So, as a question to the  
23 community, figuring out if there's any existing infrastructure  
24 to try to leverage it. Land grant institutions, growing crops,  
25 figuring out how we sign producers up to grow crops, so that



1 that data set can start being established sooner, rather than  
2 later.

3 MS. DIMITRI: Is it -- can I ask a follow-up question  
4 about that to Francie?

5 CHAIR POWELL-PALM: Sure.

6 MS. DIMITRI: Do you mind another question?

7 Like, I guess one question I have for you, is like  
8 what kind of data? Like do you need to have federally  
9 collected data? Or like what kind of data would be  
10 statistically representative enough for your purposes?

11 MS. TOLLE: So, if it was university data, and there  
12 were producers signed up, as you mentioned, and like I said the  
13 more the producers the better but, you know, if you had 10 to  
14 15 producers growing across several counties, or at least a  
15 couple of counties and multiple years, three, six is better,  
16 that type of data. And again, too, you know, even with that if  
17 you identify proxy crops, as I mentioned, we try to work with  
18 those as well to bring in additional data that's going to be  
19 similar.

20 So, there's not a hard and fast rule to what that  
21 data looks like, but it doesn't need to be federal; it's the  
22 university types' information. Just well documented,  
23 producers' own production. You know, if -- if let's say you  
24 have a delivery point that's bringing in a certain crop and  
25 that delivery point can reach out to all those producers and

1 ask -- and get their actual production and their acres, that's  
2 great.

3 MS. DIMITRI: Oh, cool. Great. Thank you.

4 CHAIR POWELL-PALM: That's a fantastic idea. I  
5 didn't know that was really -- yeah. I hadn't thought about  
6 the logistics of enrolling buyers to say who are you buying  
7 from? Let's get them -- get their data. That's awesome.  
8 Thank you.

9 Other questions for Carolyn? Or ideas?

10 (No response.)

11 CHAIR POWELL-PALM: All right, well, I think we have  
12 some marching orders. Thank you, Carolyn, for the work on  
13 this.

14 MS. DIMITRI: Of course. Thank you, everyone, for  
15 all your contributions.

16 CHAIR POWELL-PALM: I hand it back to Amy Bruch,  
17 Chair of CACS.

18 SECRETARY BRUCH: All right, thank you, I. Good to  
19 have you back.

20 I, we're going to turn to you next. You've worked on  
21 some important -- or you worked on another important topic  
22 about transition, and I'd love for you to walk us through the  
23 discussion document. Thank you.

24 BD. MEM. JOHNSON: Yeah, thank you. Given where we  
25 are on time, I had jotted down a bunch of notes summarizing

1 public comments that will make it kind of long, or we could go  
2 straight into kind of everyone talking about what jumped out to  
3 you in -- in comments, and in the discussion.

4 Do you want to go there and then I can kind of fill  
5 in gaps at the end if there's anything that we haven't touched  
6 on?

7 CHAIR POWELL-PALM: I think that's a great idea.

8 SECRETARY BRUCH: Yeah, that --

9 BD. MEM. JOHNSON: Okay.

10 SECRETARY BRUCH: That sounds good.

11 BD. MEM. JOHNSON: Okay, well, well thanks for making  
12 this part of our -- our work agenda. This is a discussion  
13 document called "Improving Support for Organic Transition."  
14 And to me, organic transition means bringing more land under  
15 organic management, which has significant benefits for human  
16 and environmental health, as well as economic opportunities  
17 attached to it. And I really appreciate the attention that  
18 organic transition, and the Transition to Organic Partnership  
19 Program network has received throughout this meeting. It's  
20 really exciting to see so much already in motion, and how much  
21 we've been able to build quickly on the years of groundwork  
22 that had already been laid.

23 So, the discussion document outlines the growth and  
24 attention to organic transition that we've seen in recent  
25 years, including USDA's unprecedented \$300 million investment

1 in the Organic Transition Initiative. I think everyone's  
2 familiar with this at this point, but I'll just reiterate; that  
3 initiative has three pillars.

4 The first is funding to build a transition support  
5 network with organic certifiers in the lead. So, that's the  
6 TOPP Program that we've been hearing about this week.

7 There's direct funding for farmers via an organic  
8 practice standard for conservation programs, and the crop  
9 insurance discount that we heard about this morning.

10 And then there are market development grants that are  
11 really aimed at rounding out the supply chain, and building  
12 markets in specific areas that have a lot of potential for  
13 growth.

14 So, the discussion document also notes that despite  
15 significant growth in organic, the sector is still relatively  
16 small, and that's in part due to barriers to transition. And  
17 it also names the heightened challenges that producers of color  
18 may face in participating in the organic sector.

19 So, we as the NOSB, have a really unique ability to  
20 gather feedback from the community, from the organic sector,  
21 from the public, and distill that feedback to USDA to continue  
22 to improve upon what's already in motion through the Organic  
23 Transition Initiative, and look at what might else -- what else  
24 might be added, and what might come next in the future.

25 So, we asked our community to answer kind of five

1 categories of questions related to organic transition. We  
2 looked for specific feedback on the Organic Transition  
3 Initiative; specific feedback on the transition process and  
4 work -- what works well, what has been tried; the relationship  
5 between inputs and organic transition; strategies for long-term  
6 retention of organic producers; and how we can expand  
7 diversity, equity, and inclusion in organic.

8           We've received a really impressive group of  
9 thoughtful public comments that ranged from high-level, big  
10 picture to really granular suggestions. I'm grateful to  
11 everyone in the room and online and who engaged in writing and  
12 through public comments to share your ideas. I was really  
13 impressed and honestly overwhelmed by the -- the quantity of  
14 feedback that we got. And the quality.

15           So, I'll -- I'll name four categories that stood out  
16 to me, and I've jotted down some potential recommendations that  
17 we could make to USDA, but first, let's have a discussion and  
18 sort of get everyone's responses to the feedback that we got.

19           So, the -- the high-level categories are: the role of  
20 consumer demand -- consumers demand and pricing; reducing the  
21 cost of certification; the role of relationships and trust --  
22 I'm calling this "Money is time," and getting out of our  
23 existing circles, were sort of themes and -- and categories on  
24 the feedback that we received.

25           So, with that, I'd love to hear what stood out to you

1 all and what you think we might be able to recommend to USDA?

2 CHAIR POWELL-PALM: Questions or comments for Allison  
3 on this document? Nate.

4 BD. MEM. LEWIS: One of the areas that has come out  
5 to me was based on my participation in Organic Trade  
6 Association's "Ask Me Anything" series, was just around again  
7 back to language and what we use, but particularly when folks  
8 are asking questions of certifiers, there's a, I think, a  
9 reticence to share specific information due to the need to not  
10 assist producers in overcoming barriers to certification. And  
11 so, there may be --there may be a way to moderate that pendulum  
12 through some clarity around what does the program think is an  
13 accreditation violation in that regard and what is not. And so  
14 that certifiers, when -- I mean, the specific question was "How  
15 big does my buffer need to be?" and a certifier provided, you  
16 know -- I can understand why a vague answer that didn't help  
17 the producer figure out what they needed to do to get into  
18 organic. And so, if we could perhaps provide a recommendation  
19 around what we think the line is between an accreditation  
20 violation and technical assistance, which I also am trying to  
21 remove from my lexicon, that could be a very concrete way to  
22 get certifiers to develop that rapport with aspiring young  
23 farmers.

24 CHAIR POWELL-PALM: Other ideas or questions? Amy,  
25 please.

1           SECRETARY BRUCH: A couple -- thank you, Allison, for  
2 all your work. You really take this topic to heart, and it  
3 really shows. Appreciate your passion.

4           I guess, a couple of things that really stood out to  
5 me was the commitment from the community. We heard from one  
6 organization that has a transition plan, they actually provide  
7 supplemental income in terms of price increase, price premium  
8 for transition producers. There isn't essentially an official  
9 transition market; there's some opportunities, they're hard to  
10 find but some companies are willing to invest in organic -- or  
11 in transition producers because ultimately, they want to work  
12 with them when they're organic. So, I think we need to build  
13 that pipeline.

14           We're not instantly organic; it takes 36 months past  
15 the last restricted use pesticide. So, kind of coupling and  
16 walking with that producer the whole way is really important.

17           And then retention is also something that we heard  
18 through public comments, and also just through stories the past  
19 few days, so looking at retention. Once we get these producers  
20 transitioned and officially organic, we need to solve some of  
21 the challenges that current organic producers are facing, also.  
22 And those are, again, with markets.

23           And also, I just think looking at maintaining  
24 integrity and making sure we're upholding all of the rules.

25           Thanks, Allison.

1           CHAIR POWELL-PALM: I think echoing Nate Lewis's  
2 comment about how do we try to be more helpful; I see a world  
3 where organic inspectors cut their teeth with a few hundred,  
4 maybe a few thousand inspections, even, and then move over to  
5 being consultants and really just put their -- put their --  
6 rather, you know, hang their hat out there for saying I know  
7 exactly what it is that you need to be certified organic, let  
8 me do the work for you. And I think we need an army of those  
9 folks. I liken it to literacy campaigns in different countries  
10 where it's you find a 17-year-old who can read, and you show  
11 them a little bit how to teach reading, and then you send them  
12 out to spread literacy, and I think we could use a really  
13 similar strategy in organics, figuring out how do we get those  
14 who know what all of these technical terms mean, and -- and  
15 have made it their bread and butter, to go out and make it easy  
16 for farmers to farm and not worry about becoming regulatory  
17 experts, as well.

18           Carolyn, please go ahead.

19           MS. DIMITRI: Just to follow up on your comment,  
20 Nate. You triggered something in my mind that through my  
21 research I found that farmers that are in transition, the  
22 inspector is almost always the primary source of information,  
23 and they would never make that hurdle without having the  
24 inspector, which -- but based upon what you were saying, is it  
25 true that the inspector's not allowed to actually give



1 technical assistance? I'm a little confused --

2 CHAIR POWELL-PALM: Oh, sure. Great question.

3 Thanks for that. So, the inspector's not allowed to help them  
4 overcome barriers to certification. If it's publicly available  
5 information, it's completely within bounds to provide that to  
6 them. But usually, it's a question of like how should I fill  
7 out this form, and that would be helping them overcome a  
8 barrier to certification, which the inspector can't do. So,  
9 being able to remove that division between what is technical  
10 assistance and what is consulting, which we take very seriously  
11 in organic inspecting, is get -- I would say the next step for  
12 how we get folks to be able to have no barriers in what they  
13 can help them with.

14 Allison, and then Kyla.

15 BD. MEM. JOHNSON: Yeah. I really appreciate that  
16 point, Carolyn and Nate and Nate.

17 I'll unpack the "Money is time" category because I  
18 think it -- it touches on both of the things that you raised.

19 I was reflecting on it on this yesterday as several  
20 of the TOPP partners mentioned that the TOPP funding has given  
21 them capacity to reach more of their state and spend more time  
22 with producers, and the -- one of the themes that came up in  
23 comments and throughout this rollout of TOPP, is that one-on-  
24 one time or just time directly speaking with someone to walk  
25 them through the process makes a huge difference.

1           We had one comment that someone who had gone through  
2 a training on certification was much more likely to succeed in  
3 their application for certification, be successful in entering  
4 the program. Just that one intervention made a huge  
5 difference. So, finding more ways to make people available to  
6 producers in different places, finding them where they are was  
7 one of the -- the comments that came up from the Black Farmers  
8 Index yesterday, is -- is a really accessible intervention  
9 and -- and literally just providing money to people to be able  
10 to do that in a lot of different venues could have a big  
11 impact.

12           CHAIR POWELL-PALM: Wood. Just -- I'm sorry, hold on  
13 Wood. Kyla.

14           MS. SMITH: You skipped me.

15           Yeah, Allison, you made one of the points I was going  
16 to make, that was something that really stood out to me, was  
17 meeting folks where they are, and then using trusted agencies.  
18 And some certifiers do have like education and outreach arms,  
19 as a part of their organization, but several don't and we're  
20 busy doing the rule following verification, and -- and don't  
21 have the time and the resources to get out to meet producers  
22 where they are. So, I think that's a very huge component.

23           The other thing that I have been thinking about,  
24 and -- is with the mentorship piece of -- that's going on with  
25 TOPP, is bringing in components not related necessarily to

1 organic production practices, but just like business plans and  
2 things that -- record keeping, and just things that are not as  
3 fun but make producers successful.

4 CHAIR POWELL-PALM: Wood, please go ahead.

5 BD. MEM. TURNER: I was just thinking about the  
6 comment you made about consulting, and I was wondering, you  
7 know, there's some discussion about whether the barrier to  
8 certification, the cost of certification is a barrier, and  
9 I'm -- I worry about the -- the barrier that consulting costs  
10 could have, as well. And I'm -- I'm just thinking about it in  
11 the context of the comment you just made about mentorship, is  
12 also really interesting because I think that's -- that's --  
13 that means -- that's important, but I also think the network  
14 effect of sort of building communities of organic growers.

15 I mean, you know, your example in Montana is a great  
16 one. I mean, what's better than having people -- like having  
17 the -- the program help get groups of growers together to  
18 share -- to share ideas, and to share some of these issues, as  
19 opposed to sort of putting a burden to necessarily or expecting  
20 that someone's going to take on the mentoring role and -- and  
21 help someone shepherd through the process.

22 So, it's interesting. I don't know if you have a  
23 thought on that, but --

24 CHAIR POWELL-PALM: Oh, boy, do I. I don't know if  
25 you heard about this little program called Transition to

1 Organic Partnerships [sic], but TOPP actually does exactly  
2 that; it goes and it pays farmers to be mentors for new  
3 farmers. And so, if you're an experienced organic farmer who  
4 is busy, but for, you know, signing up for 40 hours of  
5 question-asking by a mentee, they're going to provide a stipend  
6 to actually facilitate that relationship. And I think that's  
7 kind of the step forward I see. Best advice is farmer-to-  
8 farmer learning. I think that there's, you know, the -- the  
9 technical side of filling out an OSP; an inspector with very  
10 little farming experience, but who knows the rule, can  
11 definitely do that, but I imagine hearing from every single one  
12 of the NOFAs yesterday, if they had someone on their own staff,  
13 who is just your farmer hotline, how do I fill out my manure  
14 application record, that sort of thing I think is very, very  
15 much implementable without a ton of farming experience. But I  
16 think the -- the barrier to -- to the cost of it is very, very  
17 important.

18 Franklin, then Kyla. Oh, sorry, yeah, Franklin.

19 BD. MEM. QUARCOO: Okay, so normally when you go to  
20 somebody who you're talking to, to get into organic farming,  
21 you talk about the environment, you talk about human health.  
22 If they ask you what do the financials look like, how do you --  
23 what's the best method of answering that question? Giving some  
24 of the feedback, some farmers give about how much money are  
25 they making or not making in organic farming. So, how do you

1 answer the question? You deal with the environment, it is good  
2 for our health, is good -- but at the end of the day they are  
3 in farming as a business, so how do you handle that question on  
4 the financials? I have a follow up comment, but this will be  
5 the first.

6 CHAIR POWELL-PALM: I'll start that -- start off, and  
7 then I'll kick it over to you, Amy.

8 I think that's been sort of -- when we had Under  
9 Secretary Lester Moffitt over at our farm a couple of weeks  
10 ago, and we were hearing from farmers, I was trying to capture  
11 what is that special sauce going on in Montana that makes it so  
12 we have such a growing, thriving organic community, and someone  
13 put out that we just don't hold our cards very close to our  
14 chest. That when someone asks what price are you getting for  
15 wheat, it's immediately on the table and who your buyer is, is  
16 immediately on the table. And that's been the -- what I think  
17 has catalyzed such growth in the industry. And partly that's,  
18 you know, a community that trusts each other, and that trust is  
19 put forth as -- as the sort of the most important part of -- of  
20 building out an organization.

21 I would say though, too, smallholders, and folks who  
22 are going direct to consumers, really understanding how you can  
23 cooperate and how you don't have to see it as competition,  
24 either through formal cooperation -- cooperatives, but also  
25 through giving real numbers to trusted advisors, like land

1 grant institutions, who are building out business models or  
2 profitability analyses. But I think bringing in as many of  
3 those, if there are commodity contracts, bringing in any of  
4 those real numbers and then the real cost of production is just  
5 essential to being able to set a farmer up for success without  
6 starry-eyed or underselling the numbers.

7 Anything to add to that, Amy?

8 SECRETARY BRUCH: No. I just reiterate the  
9 transparency. I think that was one thing that was really  
10 refreshing when I started transitioning into organic. I didn't  
11 know any organic producers in my area. I went to the OID  
12 because this was pre-TOPP, and fortunately I went to the OID.  
13 I could-called a farmer on that list, and we're friends to --  
14 to this day. He helped me out. He spent 30 minutes on the  
15 phone with me and helped me through things. But I think it's  
16 important to have that network, both formalized, informally as  
17 well, because there's so many entrepreneurial things that you  
18 face in organic production that you don't necessarily face in  
19 conventional production, because there's more checks and  
20 balances in place, so the transparency, like maintenance and  
21 with contracts and talking to folks, is really important  
22 because contract negotiation is something organic producers do  
23 more of than a conventional producer, because we do not have  
24 the CBOT, and things aren't as transparent, so we need to rely  
25 on each other to just kind of form a tighter network.

1 CHAIR POWELL-PALM: Carolyn.

2 MS. DIMITRI: I guess also the research shows that  
3 you need to make a -- a premium for your organic product if  
4 you're going to be more profitable as an organic producer, and  
5 I think this is where transparency becomes really important  
6 because if people are open about their prices, then you can't  
7 really pit farmer against farmer. But it also shows why  
8 regions, like the southeast of the U.S., it's really hard for a  
9 certified organic farmer to remain in business as a certified  
10 organic operation because there is no price premium. Speaking  
11 on average.

12 CHAIR POWELL-PALM: Um-hum. Jerry, then Allison.

13 BD. MEM. D'AMORE: Thanks. I'm glad you put me in  
14 right there because I'd like to get -- come right behind  
15 Carolyn with my one thought. I spent about six years of my  
16 life, from 2000 to 2006, trying to find an appropriate and  
17 profitable home between conventional and organic for that --  
18 thing we called transition back then, as well. And I -- I  
19 found zero path in six years where it would -- would -- that  
20 led to a -- any type of premium above conventional, which is,  
21 you know, I guess would be the measurement, it didn't occur.  
22 The -- at that point, the -- the consumer had enough already on  
23 their plate just to go back and forth between conventional  
24 and -- and organic, and I would have to -- I would have to  
25 believe that today there's even more visuals for -- for the

1 consumer to consider, and I, for the life of me, I -- I don't  
2 know, short of a government subsidy, how that could be  
3 accomplished. Thank you.

4 CHAIR POWELL-PALM: Allison.

5 BD. MEM. JOHNSON: Thank you, Jerry. We need a  
6 government subsidy. This is going to be my point.

7 CHAIR POWELL-PALM: Yes.

8 BD. MEM. JOHNSON: The -- the point that -- I think  
9 it was Spencer in West Virginia made yesterday, about not  
10 having a consumer base nearby who can afford an organic premium  
11 is something that I think we have to examine really carefully  
12 because nobody should have to pay more than they can afford to  
13 have healthy, safe food in their communities. And so, we have  
14 to find a way to bridge that gap between ensuring that everyone  
15 in the supply chain is paid fairly, and that this food is  
16 affordable and accessible everywhere. So, thinking about  
17 costs, we already have the Organic Certification Cost Share  
18 Program, but the reimbursement levels haven't been updated in a  
19 decade and a half. It's not keeping up with costs.

20 We did some analysis of the 2018 Farm Bill, and that  
21 was a \$428 billion piece of legislation; 1/10 of 1 percent was  
22 dedicated to organic. So, it's not a matter of organic  
23 producers looking for a leg up, or some special treatment, we  
24 just need to get to even equitable treatment and ensure that we  
25 have mechanisms to pay producers for the public benefits that



1 they're providing. So, I think we need to get creative in --  
2 in looking at things, in addition to market mechanisms, to get  
3 there.

4 CHAIR POWELL-PALM: Franklin.

5 BD. MEM. QUARCOO: This is just a comment. Another  
6 thing I've noticed is that a number of their seasoned extension  
7 agents whilst we wait for inspectors, then consultants to come  
8 into some of these areas, the people that their farmers are  
9 most comfortable with, who they meet with constantly at a  
10 county extension agent, and a number of the seasoned agents who  
11 were conventionally trained have never received any training in  
12 organic agriculture.

13 When they get questions from farmers, some of them  
14 don't have the information because they've not been trained.  
15 So, there has to be some retraining of existing seasoned very  
16 good extension professionals, but who lack knowledge in organic  
17 agriculture, because the first discussions are going to happen  
18 between the farmers and those folks and if they say don't do  
19 it, then we don't get to -- because there's a high level of  
20 trust between the extension agents and from -- and if the  
21 extension agent doesn't know enough and is uncomfortable  
22 promoting that, and cannot answer some basic questions on that,  
23 that -- that becomes a problem.

24 CHAIR POWELL-PALM: Completely agree. Yeah. I would  
25 say it's a dream of mine that one day every FSA agent and every

1 county extension agent will have taken the IOIA basic course,  
2 and we can then have, as you said, those trusted advisers say  
3 with authority I know what organic is, and I know how I can be  
4 helpful. I think it would be just great, but on our To-Do  
5 List.

6 Dilip.

7 BD. MEM. NANDWANI: Very quick comment on what you  
8 just mentioned, and that's why again I reiterate, we have this  
9 TOPP Program, and that we have the technical assistance in a  
10 lot of our universities and educational institutes -- like you  
11 are also involved, I'm involved, and some other universities --  
12 where they provide training of trainers and they go to these  
13 counties and train extension agents, and they can train again  
14 to further their counties, and up including the farmers. Thank  
15 you.

16 CHAIR POWELL-PALM: Love that idea.

17 I think one bucket you had mentioned, Allison, is how  
18 do we meet folks where they're at? And I just wanted to give  
19 again a shout out to New Hampshire yesterday, who said they got  
20 Farm Bureau to show up and be one of their -- their partners,  
21 because I think that's sort of the inroads that we really have  
22 to be thinking about, is how do we get these trusted, very, you  
23 know, storied organizations that advocate on behalf of farmers  
24 to see organic as an asset and to be helpful towards it.

25 So, I think the more Farm Bureau folks we can invite

1 to these meetings, the more successful we're being.

2 BD. MEM. JOHNSON: And picking up on one of the  
3 points that you made earlier, Nate, and adding to what you just  
4 said, paying mentors is really important, but also finding ways  
5 to pay mentees and pay people for their time to consider  
6 organic as an option. Stipends to attend trainings.  
7 Scholarships to come to our meetings here and meet all of us.  
8 It's a hard position to be in, especially for beginning  
9 farmers, for producers of color, for people who maybe don't see  
10 themselves in this community yet, and so making sure that  
11 they're compensated and have the opportunity to give it due  
12 consideration is one of the ways that we can start to invite  
13 people in.

14 CHAIR POWELL-PALM: Franklin.

15 BD. MEM. QUARCOO: Unless I'm mistaken, TOPP is  
16 giving a little bit of financial incentive to mentees, as well.  
17 Yes.

18 CHAIR POWELL-PALM: Both mentors and mentees, um-hmm.  
19 All right, I hand it back to you, Allison.

20 BD. MEM. JOHNSON: All right, this is really helpful.  
21 Thank you all. I will attempt to make some sort of sense of  
22 all of this great feedback, and the feedback that we got in  
23 public comments, and I hope we can come forward with a proposal  
24 that makes some recommendations to USDA on continuing to  
25 implement the Organic Transition Initiative, and what else we

1 might want to see in the mix moving forward to continue to  
2 support transition. Thank you.

3 CHAIR POWELL-PALM: All right, thank you.

4 Madam Chair.

5 SECRETARY BRUCH: Okay, next -- thank you, Allison,  
6 for all your work on that. Really appreciate that.

7 SECRETARY BRUCH: Next up, we're going to start  
8 document -- a discussion document on -- and it's in the  
9 "Oversight to Deter Fraud" series, "Residue Testing for a  
10 Global Supply Chain," and this was a collaborative effort  
11 between Nate Lewis, Nate Powell-Palm, Kim, and myself, and we  
12 have a PowerPoint that we'll show you. I'll begin that, and  
13 then I'll turn it over to Nate Lewis. And also, for both  
14 Oversight to Deter Fraud PowerPoints, please enjoy the pictures  
15 from our board; some of these are from our farms, so that will  
16 be in the background.

17 CHAIR POWELL-PALM: Yeah, for the A/V team, is it  
18 possible to get the screen going, as well?

19 SECRETARY BRUCH: We can do it this way. We can't  
20 see.

21 CHAIR POWELL-PALM: It's okay. We'll just wait.  
22 We'll just wait a second, folks.

23 (Pause.)

24 SECRETARY BRUCH: Oh, thank you. Appreciate that.

25 All right, residue testing background. We're -- the

1 organic program, as we've heard, is no longer a niche. We're  
2 nearly a \$70 billion business. We've grown considerably over  
3 the last couple of decades. The strengthening of organic  
4 enforcement rule, that's an implementation currently that we  
5 heard a lot about yesterday from Jenny, it's going to increase  
6 supply chain traceability, which is really, really important.  
7 It was brought to us by the 2018 Farm Bill. Oversight globally  
8 is also going to increase. And this requires operations  
9 importing products to ensure shipments have high integrity,  
10 meaning no prohibited substances, no ionization radiation. And  
11 that really brings us to potentially an encore, and that's what  
12 we're going to be talking about today; compliance certification  
13 via testing, and that's through residue testing.

14 So, the idea with this discussion document is really  
15 to essentially build on top of supply chain supply -- supply  
16 chain traceability to have the verification step, as well. And  
17 verification really into our regulations. Compliance  
18 verification in our regulations. And it -- and it is an  
19 essential tool, and we have listed in several points of the  
20 regulations and our guidelines where this document -- where the  
21 origins of this document take place. And it's also  
22 complementary to the finalized organic periodic residue testing  
23 rule that occurred in 2013. That provided us with a minimum of  
24 5 percent of organic operations to be tested -- tested per  
25 year.

1           And just a little bit more on the background and  
2 jurisdiction of why this -- why are -- we were working on this,  
3 is EMS has legal responsibility to ensure NOP has adequate  
4 regulatory standards, enforcement guidelines, and residue  
5 testing procedures. And also, through OFA the NOSB has  
6 authority to work on residue testing.

7           BD. MEM. LEWIS: So, the discussion document proposes  
8 a set of -- a framework and sort of via the -- via a set of  
9 questions on how to evaluate different -- different testing  
10 protocols for prohibited substances. They're focused on  
11 testing being a tool for verification that folks are following  
12 the rules, and so we want to make sure that the -- the message  
13 is loud and clear that we understand organic is a process-based  
14 standard, and that testing is not a substitute for following  
15 all the rules.

16           We want to leverage federal oversight over prohibited  
17 substances when it's possible, so we currently reference EPA  
18 tolerances and FDA action levels for pesticides. We want to  
19 look at what other federal programs that are in charge of  
20 hazards and contaminants can be leveraged so that organic can  
21 remain a leader in products free of prohibited substances.

22           We need to make sure any testing we propose is  
23 following what is in the regulations, which requires it to be a  
24 AOAC, I don't know that acronym, but it's a -- a accreditation  
25 for laboratories, so that we meet that that requirement in the

1 current regulations. So, we want to make sure any tests that  
2 we bring forward are reliable, quantifiable, and widely  
3 accepted.

4 And then we need to make sure that there's adequate  
5 guidance in terms of responding to positive results.

6 A quick summary of the public comments. We heard  
7 loud and clear, as I mentioned, organic is process-based, not  
8 testing-based, and it is -- that testing is not a substitute  
9 for onsite compliance verification -- I'll give myself some  
10 candy -- contamination, mislabeling, and the 36-month land  
11 eligibility requirement are all parts of -- of that.

12 We heard about the need to update the NOP handbook on  
13 expanding and increasing the utility of the prohibited  
14 substances list. I really like that idea. The next slide has  
15 some -- some thoughts around where we might push that out.

16 And then expanding the response to positive results,  
17 particularly when there isn't an EPA tolerance or FDA action  
18 level for that substance or crop.

19 And then some comments around revisiting the USDA  
20 organic regulations, so is there an opportunity in -- in  
21 providing some support to certifiers to share that -- the  
22 testing cost burden? How do we leverage the exclusion from  
23 organic markets reference to give certifiers more swift tools  
24 to respond to positive results?

25 And then we heard about the need to figure out some

1 way to compile test results so that we can anticipate where  
2 fraud is occurring, or where contamination concerns are  
3 greatest, as -- as opposed to react to them piecemeal or one by  
4 one.

5           Okay, some next steps and some thoughts. Clarifying  
6 the testings -- clarifying testing's role in organic. I would  
7 love for the Board to consider a resolution at the spring,  
8 around just organic is process-based, testing is not a  
9 substitute for inspections and systems plans, but it is a tool,  
10 and so I'm sort of excited to see where that may -- may land.

11           As I mentioned, there's -- we're seeing a need to  
12 propose updates to the NOP guidance on residue testing, so  
13 particularly around the list of prohibited substances and  
14 responding to positive results. And then consider proposing  
15 revisions to the organic regulations in the areas I've already  
16 mentioned.

17           So, sort of a three-pronged approach: understanding  
18 that a resolution is something that we can do sort of one-off,  
19 and it's more of a statement to the community. Guidance, I'd  
20 be interested to hear from the program around how they look at  
21 the different burden they would incur in updating guidance  
22 versus regulation, so the guidance I imagine is a little bit of  
23 a lighter lift than a regulatory change, but just walking into  
24 this eyes wide open; that guidance is important, and maybe a  
25 lighter lift than the -- the regulation update, but we want to



1 approach both of those topics.

2 And I think -- is that all we have? The whole  
3 presentation's a problem? I know, the whole -- yeah. I mean,  
4 I'm going to -- yeah.

5 SECRETARY BRUCH: Maybe you planned that.

6 BD. MEM. LEWIS: So, I'll turn it back over to you,  
7 Amy.

8 SECRETARY BRUCH: Yeah, thank you for finishing that  
9 up.

10 All right, we want to just turn over to the committee  
11 and the full board for discussion, either with our public  
12 comments' summary, or maybe there's some additions you'd like  
13 to bring forth or any comments on our next steps. Go ahead,  
14 Dilip.

15 BD. MEM. NANDWANI: It's not a question. AOAC, as a  
16 Nate Lewis asked, and I'm looking at here, just want to make  
17 sure I say it correct, started with Association of Official  
18 Agricultural Chemist, and later it was turned to Analytical  
19 Chemists -- Association of Analytical Chemists later. Anyways.

20 BD. MEM. LEWIS: Thank you.

21 SECRETARY BRUCH: Perfect. Thank you.

22 Kyla, go ahead.

23 MS. SMITH: Super excited to get an update if we can  
24 make it happen on those documents that are in the program  
25 handbook. They are instruction to certifiers, which is

1 different than guidance, in my understanding, and I think  
2 easier to update.

3 BD. MEM. LEWIS: Duly noted.

4 MS. SMITH: I could be wrong.

5 SECRETARY BRUCH: Thanks, Kyla. That was --

6 MS. SMITH: It's been known to happen.

7 BD. MEM. JOHNSON: Well, that was going to be a  
8 question for Jenny in the next discussion. But so, the  
9 handbook is like best practices, but not formal guidance; is  
10 that --

11 MS. SMITH: So, there is guidance that is more  
12 applicable to certified operations that are, you know, like  
13 best practices. If you follow the guidance, you will be  
14 complying with the regulations, right.

15 BD. MEM. JOHNSON: But --

16 MS. SMITH: There are other ways to comply with the  
17 regulations, and if you are doing something different than  
18 what's in the guidance, then certifiers might need to see a  
19 little bit more justification or things like that, right.

20 Instruction is instruction to certifiers, and is  
21 expected to be followed, and again, if it's not being followed  
22 to a T, I think, you know, during accreditation audits, there's  
23 like an opportunity to like maybe show how you're doing it  
24 slightly differently, that it would still comply, but it is the  
25 expectation, and I know that PCO has gotten non-compliances for

1 not following instruction to a T.

2 CHAIR POWELL-PALM: Do we have a question --

3 SECRETARY BRUCH: Go ahead, Nate.

4 CHAIR POWELL-PALM: -- for jenny now that she's back?

5 BD. MEM. LEWIS: Yeah.

6 CHAIR POWELL-PALM: Right when she walks in the door,  
7 get her.

8 BD. MEM. LEWIS: I -- I was going to -- I was going  
9 to post it, it will take me a little while to get it out, so  
10 you can --

11 DR. TUCKER: If I could just get a minute to breathe?

12 BD. MEM. LEWIS: Yeah, yeah.

13 DR. TUCKER: That would be great.

14 BD. MEM. LEWIS: My understanding is that guidance --  
15 to update guidance in the handbook, notice and comment has to  
16 occur in order to follow the Administrative Procedures Act.  
17 And the question is related to instruction to certifiers; does  
18 it fall -- does it have the same rules that guide -- that guide  
19 the updates to instruction documents?

20 DR. TUCKER: Okay. Yes, is the bottom line. So, the  
21 handbook -- and this is as Office of Management and Budget,  
22 OMB, issues new guidance documents on how to do guidance  
23 documents. It does change how different agencies do things.  
24 And so, the handbook, you know, originally some of the  
25 documents in the handbook got posted without public comment,

1 and then we started to do public comment on guidance, but not  
2 instructions. But a few years ago, it was right around the  
3 time we did the import oversight instruction, at that time the  
4 Council's office recommended that we could issue an interim  
5 instruction and hold people accountable for it, but we did need  
6 to open a -- a opportunity for public comment on it, so people  
7 can send feedback on it. So, guidance is a little bit  
8 different from instructions, but basically all of those --  
9 those -- anything we're going to enforce again, we need --  
10 against, we need to have an opportunity for the public to weigh  
11 in. For the regulated community to weigh in.

12 Was that too bureaucratic?

13 BD. MEM. LEWIS: That was clear to me, so.

14 DR. TUCKER: Okay. And I didn't even use our magic  
15 words, so --

16 BD. MEM. LEWIS: No, I know.

17 DR. TUCKER: -- not bad, huh.

18 BD. MEM. LEWIS: As a follow-up to that, is it a  
19 correct assumption that an update to the handbook is a smaller  
20 lift for the Standards Division than a rule change?

21 DR. TUCKER: These days --

22 BD. MEM. LEWIS: It depends?

23 DR. TUCKER: -- it really depends. So, I think our -  
24 - in general, right now guidance and rulemaking are about the  
25 same lift. So, the benefit of guidance is it provides -- it's

1 longer, right, and so it provides more of the -- the thinking  
2 and the context, and so for super technical content, it is a  
3 good tool, but it's the same amount of work, ultimately, as  
4 rule making. Both just to internal clearance, but also with --  
5 with OMB. Instructions are a little faster.

6 I would say we're also going through the handbook  
7 right now because there are a lot of documents that need to  
8 either be archived, because they were completely replaced by  
9 strengthening organic enforcement where they need to be  
10 updated. Anything that needs to be substantively updated,  
11 meaning policy will change, even if it's gone through public  
12 comment before, would have to go through public comment again.

13 So, we are being very strategic in what we do with a  
14 handbook. It will be an iterative process of updating the  
15 handbook based on what can be done quickly and what is going to  
16 take more time to get done.

17 We also have an updated the handbook in a while, and  
18 so it could be that we get slightly different instructions on  
19 instructions, so -- because we haven't done one of these in a  
20 while, because we have been focused on rules, because we can  
21 actually really firmly enforce those.

22 People are laughing; did I say something silly?

23 BD. MEM. HUSEMAN: Instructions on instructions.

24 DR. TUCKER: Oh, instructions in instructions.

25 BD. MEM. HUSEMAN: We have an SOP on SOPs in my

1 organization. We all laugh about it every time we see it.

2 DR. TUCKER: There you go.

3 CHAIR POWELL-PALM: Allison, please go ahead.

4 BD. MEM. JOHNSON: Thank you. That was a really  
5 helpful clarification.

6 I have two follow-up questions. This is getting  
7 wonkier and wonkier by the minute, so I apologize. So,  
8 effectively, the difference between guidance and a rule is that  
9 the rule would be binding, and the guidance is non-binding, but  
10 pretty much you have to do it anyways; is that accurate?

11 DR. TUCKER: That's -- I think we -- we see guidance  
12 as enforceable. The guidance is enforceable because anything  
13 we put in the handbook, like guidance or instructions, always  
14 refers back to the regulation. So, when we issue a non -- can  
15 I say non-compliant? When we issue -- you broke the rule  
16 notice -- so, and I really do need some chocolate right now,  
17 I'm just saying.

18 When we issue a notice to certifiers that they are  
19 not following the rules, we cite to the -- the 7 C.F.R. 205.  
20 The Rules. The regulation -- I am going to use -- we have  
21 regulation there, because it is a term of art in this very  
22 wonky conversation.

23 Instructions do the same thing. Instructions do  
24 point back to the -- back to the -- the Code of Federal Reg --  
25 that's not any better. It does -- it does point back to the

1 rule, and the -- and the Federal Register. And so that is  
2 actually  
3 what -- when we're taking an enforcement action, what we're  
4 enforcing against, is the rule itself, not the -- those other -  
5 - those other documents. But having public commenting on those  
6 documents is important because then we can use, here's the  
7 cite -- the citation, and then here's what all these other  
8 documents say, that explain what we were thinking and why you  
9 do need to do it.

10 BD. MEM. JOHNSON: So, then is -- do you have any  
11 tool to say this is a best practice, so it would be really good  
12 if you all did X, Y, Z, but where there's no risk that if you  
13 didn't do that you would be on the road to a non-compliance?

14 DR. TUCKER: We're using the Learning Center more and more for  
15 that, and so we're very, very careful with Learning Center  
16 courses, that where it is a rule that you need to follow, we  
17 use words like "must" and "shall." If it is a best practice,  
18 we either, in the Learning Center say, here are some best  
19 practices, or you should do this, or it is strongly advised,  
20 though I don't like the passive voice. Occasionally, the  
21 passive voice can be kind of helpful. But we are very careful  
22 in the Learning Center, and there are a lot of courses in the  
23 Learning Center that refer to best practices, or this is what  
24 certifiers do successfully to implement these -- these rules  
25 and requirements.

1           You really are just trying to get me to eat some more  
2 sugar, aren't you?

3           CHAIR POWELL-PALM: Other questions for Jenny or any  
4 other thoughts or comments from the Board?

5 (No response.)

6           CHAIR POWELL-PALM: All right, back to you, Amy.

7           SECRETARY BRUCH: All right, thanks, Nate. And  
8 thanks, Team, for working on this topic.

9           I guess, let's see, do you want to proceed to the  
10 last item, Nate? Or we're close to --

11          CHAIR POWELL-PALM: We are about four minutes from  
12 lunch, everybody, so let's just give ourselves those four  
13 minutes.

14          SECRETARY BRUCH: Okay.

15          CHAIR POWELL-PALM: We're going to come back in an  
16 hour and a half, and were going to finish up with -- so -- or  
17 2:00 p.m.; we're coming back at 2:00 p.m. No, sorry, one  
18 second. Let me do some math. How does everyone feel about an  
19 hour lunch?

20 (Pause.)

21          CHAIR POWELL-PALM: Okay, we'll keep this schedule as  
22 is. We're going to come back at 2:00, and we're going to pick  
23 up CACS; we have one more agenda item to cover on CACS. So,  
24 we'll see you all back here at 2:00. Thanks.

25          (Whereupon, at 12:41 p.m., a luncheon recess was taken.)





1 collaborative -- collaboratively on this document, and we have  
2 some slides for this, just to give a little background and  
3 examples.

4 All right, currently the challenge is that location  
5 information is not consistently collected by certifiers. Some  
6 certifiers cannot show, in aggregate, where the fields they  
7 certify are located via an interactive mapping database.  
8 Solution: with zero impact to the farmer, certifiers would  
9 collect legal parcel ID or GPS codes.

10 All right, the goals of this proposal is for  
11 consistency that all certifiers are deploying the same  
12 technique and enforcement, enable to do cross checks better  
13 amongst certifiers, facilitate effective unannounced  
14 inspections, and conduct aggregated analysis of high-risk  
15 regions or countries. Last season, last semester, we coined the  
16 phrase "Inspectors want to spend more time fighting the fraud  
17 than finding the farm."

18 Okay. Sorry, before I passed to Nate, we did hear  
19 from the community about just some questions on how this could  
20 be deployed, so we put together an example to better articulate  
21 our vision with this.

22 CHAIR POWELL-PALM: So, this is a little snapshot of  
23 an example that a certifier sent my way. When you go to see a  
24 field, say you're a certifier or a inspector, we have done such  
25 an incredible job making a big inclusive opportunity for folks

1 to record and report their fields using very general and loose  
2 language, and so as you can see, Stacy's Field, or Man 1, or  
3 Leo's Field. When I asked this certifier how they would go  
4 about knowing where this field is, they said they would have to  
5 go and basically collate four different documents to try to put  
6 together the story of where they might be able to find this  
7 field.

8           In most applications, inspectors are led around by  
9 the nose to each field. We would not be able to find them on  
10 our own. But, it's really important that farmers are still  
11 able to call the fields what they want so they can keep track  
12 of them. If I were to number all the fields on my farm, I  
13 probably wouldn't be able to remember which field is which, so  
14 usually I use the landowner's last name as the name of the  
15 field, but as you can see in this left column where we just  
16 have numbers, there's so -- it's -- it would be so easy to put  
17 a legal descriptor or a geocode in one of those columns just to  
18 marry up, so that we have a way to communicate between  
19 certifiers.

20           In this example, the certifier we were talking to  
21 said that they received a question about a field from another  
22 certifier, and when they looked at it, they were trying to  
23 figure out how do I describe where this field is in this cross  
24 check? And you can't say "Tony's Field" or "Stacy's Field," it  
25 just doesn't work. So, we need to create a consistent way to

1 describe fields, and we have a lot of options.

2           This is purely rhetoric, but Brian, may I ask you a  
3 question?

4           BRIAN CALDWELL: Sure.

5           CHAIR POWELL-PALM: Do you pay property taxes?

6           BRIAN CALDWELL: I do.

7           CHAIR POWELL-PALM: Wood, in North Carolina at your  
8 family farm, do you pay property taxes?

9           I've Googled -- and I'm surprised how many other  
10 people have apparently googled this -- "Are there any states  
11 without property taxes?" The answer is no.

12           Nate.

13           BD. MEM. LEWIS: There is a territory that does not  
14 pay property taxes, Puerto Rico.

15           CHAIR POWELL-PALM: Okay, well that's helpful.

16           In the greater United States, we all pay property  
17 taxes, and when we're thinking about, you know, the concern of  
18 how do we identify immutable information descriptors of fields,  
19 every field is going to have either a deed code, or its going  
20 to have a legal description. In the West, we have township  
21 section and range, and so this is not a big lift folks.  
22 Everyone who is in here is going to be able to describe their  
23 property in a way that corresponds with basically the  
24 authorities that manage that property right.

25           This is a field map that you are likely to see in a

1 certification file. So, we see that the name "Stacy" is tossed  
2 on there, we see that its 20 acres, and the directions to the  
3 field are on the bottom.

4 Wood, would you mind reading that out to me?

5 BD. MEM. TURNER: I believe "across from the barn."

6 CHAIR POWELL-PALM: Barn.

7 Allison, could you find this field?

8 UNIDENTIFIED SPEAKER: (No audible response.)

9 CHAIR POWELL-PALM: Only barn in the States.

10 This is -- I again, I love how organics has made it  
11 so it's really easy for folks to meet us where we -- for us to  
12 meet them where they're at in certification. That when they  
13 describe their field, we've been really good at saying like,  
14 just give us a general description and we'll be able to keep  
15 going with it. We've kind of, in the spirit of continuous  
16 improvement, outgrown that system, that we need to start moving  
17 towards a place where we could say this field, township section  
18 and range, is recorded so that when somebody else has a  
19 question about this field, say a question about it being  
20 sprayed, or a question about who is also maybe certifying it,  
21 how can we go in and know with certainty what we're talking  
22 about. And then create a language between certifiers for how  
23 to describe these parcels.

24 The big giveaway here is, in America, we're probably  
25 going to be okay. This is not a big lift. Where I'm very

1 interested in finding out what happens is in the international  
2 space, and so when folks and international certifiers are told,  
3 you have to tell us exactly where every field for these  
4 millions of bushels that you're exporting of grain, will those  
5 fields suddenly disappear? And will we have a better idea  
6 about where these fields are, who is actually getting  
7 legitimately certified and not just certifying ghost fields,  
8 and how will that shake out?

9           So, when we said geocodes, or any other legal land  
10 descriptors, it's making a big tent, where in the U.S. we're  
11 going to be able to know that by the -- mostly by the property  
12 tax codes, we're going to be -- have some immutable identifying  
13 information there, or in any application we could use a geocode  
14 because it applies to the entire globe.

15           An example of this geocode, and this was always  
16 interesting for how much conversation this concept generated,  
17 is that the idea of where a field is, if you can get us to even  
18 just any point on a field if, you zoom out -- and this is a  
19 picture of one of Amy's fields -- we can get a good idea of the  
20 boundaries of the field. That you're able to see here that the  
21 four roads are going to be crossing. We have a path on that  
22 south side. The location is not -- you know, the location of  
23 the ping in the field is not that necessary -- like not that  
24 necessary, not that prescriptive ,but the idea was that this  
25 would be an easy solution for creating another reference point

1 that, again, is going to be presented in such a way that we can  
2 reference back and back it up. Right now, we are sort of  
3 taking the word of any producer on an application as to what  
4 their field is, where it is, and how we find it.

5 Anything to add to that, Amy?

6 SECRETARY BRUCH: No, that's -- I guess -- yes,  
7 actually, one -- one thing. Sorry, I always have "one thing"  
8 to say. But we did listen to the community in the spring  
9 session. We were fortunately able to have two plains community  
10 folks join us during the public comment process, and we did ask  
11 them is parcel number -- so that's what you pay the property  
12 tax -- is that a common type, word, vocabulary, does that --  
13 does that make sense? And that -- that was agreed upon, that  
14 that was more understandable than the term "field," so we did  
15 make modifications in our document to include parcel number.  
16 We did make modifications in our document to include other --  
17 other means of giving us GPS, and those are again the parcel  
18 number and address, not a mailing address that -- such as Route  
19 2, Box 176, which was my original address growing up, but a  
20 street address, because we did hear, I think from commoners in  
21 the Northeast, that -- that land is a little bit more  
22 developed, there's street addresses to a lot of the farms.  
23 Perfect. That's great. And legal address, like Nate  
24 mentioned, township, section, and range, that's really helpful  
25 also. All of those points will lead us to a GPS that then, you

1 know, we did hear from certifiers that work for, I believe,  
2 WSDA, that said they take a point and then they make a KMZ  
3 file, which is actually a file that shows you the boundaries of  
4 each property. So again, I don't know if anybody uses  
5 QuickBooks for tax purposes, you enter -- once you enter in the  
6 data, you can generate reports really nicely. It is a little  
7 bit of a lift to enter in the data; however, when you can  
8 manage aggregate data it's really going to be important. And  
9 managing aggregated data for where these fields are, again, are  
10 going to help us understand mass balances from a regional  
11 standpoint. Like Nate mentioned, from an international  
12 standpoint, in doing these mass balances showing where high-  
13 risk areas are, et cetera.

14 CHAIR POWELL-PALM: If I -- if I could just offer a  
15 little more specificity.

16 SECRETARY BRUCH: Yeah.

17 CHAIR POWELL-PALM: I think we heard from several  
18 commenters that they couldn't quite understand why -- how this  
19 would help with mass balance. So, just again as a little  
20 example, so if we're being able to record these fields and  
21 enter a crop along with them, so we record this field you see  
22 in front of you, and its corn this year, and certifiers are  
23 able to assign and marry up both that legal identity of the  
24 field, its acreage, as well as the crop in which its growing,  
25 they're able to understand how much of the -- is the capacity



1 of their portfolio of clients. And they're able to understand,  
2 if I suddenly see receipts that far exceed what I would expect,  
3 I have a reference point to go back to and make a, you know,  
4 make a risk determination over what I'm seeing actually in the  
5 field over the course of the inspection season.

6 Normally, that's doable by a lot of different  
7 certifiers. We have CCOF who said they can do it. Oregon  
8 Tilth. WSDA. Montana Department of Ag puts the legal  
9 description right on the certificate. So, this is not new to  
10 anybody, but it is inconsistent across the -- both across the  
11 United States, but really across the world, and I think that  
12 across the world part is most interesting for how we can  
13 possibly improve the system.

14 SECRETARY BRUCH: Yeah, absolutely. And then when we  
15 look to benchmarking with other -- other countries and their  
16 systems, the Mexican organic system, which we learned last  
17 semester requires GPS coordinates for all the farms they  
18 certify to their standard. We heard from certifiers  
19 domestically. I believe it was OneCert, for all international  
20 farms they require GPS codes, so it -- it's something that's  
21 common language.

22 Risk Management Agency, who we heard earlier today,  
23 they expect and -- and need for reconciliation purposes, actual  
24 field locations, so it's -- it's where the industry is  
25 morphing, and it is starting to be more common -- common type

1 language. But we do recognize the diversity in our community  
2 and that's again why we point to several means of getting us to  
3 the end result.

4 CHAIR POWELL-PALM: I would just add that in the --  
5 in the recommendation, we note that the goal here is for  
6 accredited certifiers to obtain consistent location  
7 information, with an example of geocodes being one. This is  
8 not prescriptive, we're just looking to, you know, get -- to  
9 try to get everybody pulling in the same direction to have a  
10 better idea as to where the fields are that produce all this  
11 grain, that in a way as we sort of look back is a source for so  
12 much consternation in -- in public comments over here. How do  
13 we make sure that the grain being produced, purchased, imported  
14 is legitimate? And this is one step. It's a very low hanging  
15 fruit, and -- and we see it as something that's going to be  
16 just the beginning of hopefully a bigger, more robust system  
17 that helps fight fraud.

18 SECRETARY BRUCH: Yep. I like to call it "basic  
19 conditions." It's not the tool that's going to solve all the  
20 issues, but we need to get the foundation solidified,  
21 especially since our industry is growing like it's growing.

22 CHAIR POWELL-PALM: Questions from the Board?  
23 Allison.

24 BD. MEM. JOHNSON: Thank you for this presentation.  
25 It's really clear. This felt pretty straightforward in

1 Subcommittee. We got a lot of comments, so I -- I want to walk  
2 through my understanding and make sure I understand what we're  
3 actually proposing here and what the impact is.

4 So, Nate, what you just said, I think, is the key to  
5 some of the confusion; that the "(geocodes)" is meant to be an  
6 example, but not an exhaustive list of how you could get the  
7 location information?

8 CHAIR POWELL-PALM: Correct.

9 BD. MEM. JOHNSON: And that the list above, in the  
10 Proposal C, in the -- the feedback piece, is another -- or  
11 three other examples of how you could --

12 CHAIR POWELL-PALM: Um-hum.

13 BD. MEM. JOHNSON: Okay. So, I think we might need  
14 like a copy-editing fix here, an "e.g." or an "example" or  
15 something like that in that parenthetical, because I've, going  
16 back and rereading it several times, I thought it was saying  
17 location information, which is a geocode, and going on.

18 CHAIR POWELL-PALM: Um-hum.

19 BD. MEM. JOHNSON: So, if we can make that  
20 clarification, I hope that will address --

21 CHAIR POWELL-PALM: Sure.

22 BD. MEM. JOHNSON: -- some of the concerns.

23 And then just pulling their -- our discussion from  
24 earlier about guidance, what we're proposing here is that the  
25 NOP provide guidance on this issue, which would have to go

1 through public comments and be binding -- essentially binding,  
2 right?

3 CHAIR POWELL-PALM: So, that was something that I was  
4 very interested in; who commented on this proposal? Because  
5 there is nowhere in OFA that this isn't -- that this is rule  
6 [sic], so it will go through the same process. And again, it's  
7 a conversation starter to get certifiers thinking about do we  
8 have any idea where the fields we are -- fields are that we  
9 certify? So, your example, yes, correct for the path forward,  
10 but it's also not something that -- it's going to be, you know,  
11 a condition of accreditation hopefully. Nothing that would  
12 lose a certifier accreditation.

13 BD. MEM. JOHNSON: Maybe this is a question to Jenny  
14 or Jared then. What I took away from our conversation earlier  
15 is that by making it guidance it could actually put someone's  
16 accreditation at risk if they didn't do this.

17 DR. TUCKER: It could. I -- I would want to -- I  
18 would want to also look at this recommendation through the  
19 light of the capabilities that are already in the Organic  
20 Integrity Database, because strengthening organic enforcement  
21 specifically calls on certifiers to submit information through  
22 the database. So, if that becomes a requirement of the  
23 database, then it's actually covered under the regs by -- by  
24 reference.

25 So, I -- we would want to take a look at what is the

1 most, both expedient and reasonable response to this type of  
2 recommendation. I'm waiting. I have a technical person in the  
3 chat and I'm really hoping that she'll send me an answer to a  
4 question I just sent her. So, I think we would have to look at  
5 it in terms of guidance and perhaps building on capabilities  
6 that -- that may, in fact, already exist. So, we'll have to  
7 take a look at that.

8 CHAIR POWELL-PALM: Other questions? Kyla.

9 MS. SMITH: Yeah. Good? Okay, sorry. Yes, I have  
10 had the opportunity to have lots of conversations on this topic  
11 and appreciate the presentation. And I do think that, you  
12 know, and we heard through public comment, that there are  
13 differences in the East and the West in how we talk about land.  
14 And so, I think that that's like coming through, and so I do  
15 think just a reminder on terms because even, Nate, when you  
16 were talking, you were saying "field," and I was like you mean  
17 "parcel"? And so, I just am like continuing to say that in  
18 my -- in my head.

19 And you know, we -- we heard that, again, in the East  
20 that -- and you said this again in the presentation -- just  
21 that there is more often a address, physical address, street  
22 address that goes with land in the East, more so than in in the  
23 West, and so that seems like a viable option here.

24 And just to be clear, too, that this was helpful for  
25 me because I'm not a farmer, and so I don't think about these

1 distinctions with like parcels and fields as much, but a -- a  
2 parcel number, if that is what is being used, could be used for  
3 more than one field. So, on that chart with like Stacy and Leo  
4 and Bill 1, 2, 3 -- like Bill 1, 2, 3 like could all have the  
5 same number associated with them because it's the parcel number  
6 that includes those three fields. And so that was -- I think  
7 we often talk about like a unique identifier, right, and so the  
8 unique identifier is to the parcel, not necessarily to the  
9 field. And so, you're getting in the general location, like  
10 spitting distance of Bill 1, 2 and 3 by using that code. That  
11 was --

12 CHAIR POWELL-PALM: Absolutely.

13 MS. SMITH: -- was really helpful for me to like be  
14 talking about this in like real examples.

15 CHAIR POWELL-PALM: Um-hum. The goal is to get us  
16 within earshot of where we're producing these products. There  
17 was a lot of concern over what if my fields change? What if  
18 the sizes change? The legal boundaries of the field does not  
19 change unless you're submitting a subdivision, and that's a  
20 much bigger process. And how often that occurs is going to be  
21 rare.

22 But we have an update from Jenny, I think, on that  
23 earlier question.

24 DR. TUCKER: Yeah. So, apparently in the Organic  
25 Integrity Database, we take addresses that are provided by

1 certifiers, and then we use an external service to translate  
2 the -- them into geocodes, but right now we don't accept  
3 geocodes as part of the data submission template. So, this  
4 would likely, given that, could become -- we'd have to think  
5 about could we expose, for example, the results? If we're  
6 taking addresses and trans -- but that's just at the address  
7 not the field level, so that's really different. So, I -- I  
8 think the reality is on this one it would be a, both policy and  
9 technology solution. We'd have to deal with it on both fronts;  
10 it's not already built into the technology.

11 So, I don't know if that just complicated it or not.  
12 We'd have to really -- we'd have to think about how to deal  
13 with that, both policy wise and technology wise. Bottom line.

14 CHAIR POWELL-PALM: Carolyn.

15 MS. DIMITRI: I guess, I find this whole conversation  
16 like simple, but also extremely confusing at the same time.

17 So, I wonder, Nate, have you thought of like any  
18 unintended consequences that could happen based upon what  
19 you're proposing? Like unpleasant outcomes.

20 CHAIR POWELL-PALM: I love that question. Of the  
21 3,000 inspections I've done in my career, probably about half  
22 have been on Amish farms, and so I really take to heart this  
23 question of will this affect any one group more than the --  
24 more than others? And I feel very confident that the answer is  
25 no, because it's all on certifiers.

1           When I look to certifiers who have already executed  
2 similar -- well, some groups, the certifiers, but when I look  
3 to certifiers who have already done this system, from WSDA,  
4 CCOF, Oregon Tilth as we had in our slide, the certifiers who  
5 represent more than half the certified operations, it's going  
6 well. That we know where those fields are. It's -- they're  
7 easily located. They're mappable.

8           In eSearch, which is a technology -- a database that  
9 a lot of certifiers use, not everyone but a lot, they also have  
10 spots for all this information to already go and be entered for  
11 geocodes, latitude, longitude. And I think it's something that  
12 when we hear from inspectors who are out there doing the heavy  
13 lifting, trying to find fields, and fight fraud, that they also  
14 resoundingly said this would just be a big help. So, as we  
15 think about human capital, making the inspector's life easier,  
16 I think this is huge. It's going to be a zero burden on the  
17 farmer because it's all on the certifier.

18           And with deep gratitude, I say thank you certifiers  
19 for always doing the heaviest lifting. I mean this is always  
20 an ask for more and more, and I am very grateful.

21           MS. SMITH: I just was laughing to myself because  
22 of -- we're in the middle of that SOE --

23           CHAIR POWELL-PALM: Yeah.

24           MS. SMITH: -- we just had OLPS drop, and we're like  
25 oh, just go grab those geocodes, guys, that'd be great.



1 BD. MEM. JOHNSON: Add to that, Nate. So --

2 CHAIR POWELL-PALM: Please.

3 BD. MEM. JOHNSON: -- I appreciate those thoughts.

4 So, one scenario is you're using this information for  
5 a mass balance; something looks funny, and then what, an  
6 inspector goes out at -- like, so like I guess I see that's  
7 where a problem could come up. Like how would you solve that  
8 if using this information? Like, can you sort of walk through  
9 how this helps you solve a mass balance problem, one. And two,  
10 what happens if like, say, the things moved around on a farm --  
11 on a particular farm and things are a little bit not exactly  
12 matching --

13 CHAIR POWELL-PALM: Um-hum. Um-hum.

14 BD. MEM. JOHNSON: -- that information? I guess  
15 that -- yeah.

16 CHAIR POWELL-PALM: So, I -- correct me if I'm not  
17 understanding what you're saying, please. With the -- the  
18 location information, we're going back to a legal parcel, and  
19 so we have a way, either through your county cadastral, you're  
20 interactive mapping, through your, you know, your -- your state  
21 interactive mapping system; when a farmer says, this is where  
22 my farm is and this is how big it is, we can go check. If we  
23 need to. If someone says that it seems like they're producing  
24 a heck of a lot of wheat off that field, there's one way to go  
25 back and say, is that the -- what information they give us is

1 accurate? We have folks that are -- may also do the same work  
2 every single season, so it's not -- we're not reinventing the  
3 wheel at all here.

4 For the mass balance application, right now we do  
5 such -- such, sort of, focused and tiny mass balances, so if  
6 we're doing at the farm level, usually we're doing it on a  
7 single crop for the whole year. And so, we're saying, how much  
8 wheat did you produce this year? Then we're going to get a  
9 "bushels per acre" out of that. But that doesn't really expose  
10 any sort of systemic fraud, and so I see it as a certifier,  
11 being able to hear from someone, it seems like this county is  
12 producing a lot, you're the biggest certifier there, and  
13 there's not a way for them to go in now, on the whole, to -- to  
14 have some data to check that out.

15 Dilip.

16 BD. MEM. NANDWANI: Okay. To understand in simpler  
17 terms of what Carolyn, and I think Kyla just mentioned, what  
18 I'm getting is that -- or it's a question also -- for example,  
19 a farmer has 100 acres, or let's say 500, it's a big farmer,  
20 500 acres of land.

21 CHAIR POWELL-PALM: Um-hum.

22 BD. MEM. NANDWANI: And he or she is growing  
23 different crops, let's say in one corner of Plot A, which is  
24 next year because of crop rotation and, you know, the practices  
25 we do move 200 acres or 500 acres apart from East to West; is

1 it going to be in the records like this is the GPS location,  
2 and then next year is going to change to this and that and all  
3 that? Or is just the one geocode we are discussing to have  
4 only for one land parcel? Thank you.

5 CHAIR POWELL-PALM: And I would -- please correct me  
6 if I'm not understanding you right. But clarifying that, that  
7 500 acres could be a single land parcel. It could be four land  
8 parcels, say it's, you know, 100 acres that have been married  
9 together; we're really just looking -- and this is sort of how,  
10 again, low hanging fruit this is, we're just looking to get to  
11 that 500 acres.

12 BD. MEM. NANDWANI: Okay.

13 CHAIR POWELL-PALM: Internally, a lot of other OSP  
14 questions we would ask. We would look at the maps. We would  
15 dive in deeper. But right now, we don't really have a  
16 consistent way across certifiers to even find that 500 acres.

17 BD. MEM. NANDWANI: Okay, thank you.

18 CHAIR POWELL-PALM: Thank you for the question.

19 Any other questions? Allison, please.

20 BD. MEM. JOHNSON: This has been really helpful,  
21 thank you.

22 I have three friendly amendments to the language to  
23 offer, if that is reasonable --

24 CHAIR POWELL-PALM: We welcome them.

25 BD. MEM. JOHNSON: -- protocol.

1           Okay, so the first is to consider saying "NOP advise  
2 all accredited certifiers," instead of "provide guidance," so  
3 then NOP can kind of look at OFPA, look at the implications of  
4 different types of communication with certifiers, and choose  
5 the right tool, so that there aren't accreditation  
6 repercussions, but it's clear that this is the best practice.

7           CHAIR POWELL-PALM: Um-hum.

8           BD. MEM. JOHNSON: Second would be, further in that  
9 sentence it says, "To obtain," I'm wondering if we want to say,  
10 "to record" or "to document," because if I'm certification  
11 staff who haven't heard this discussion, I see "obtain," I ask  
12 for it.

13          CHAIR POWELL-PALM: Um-hum.

14          BD. MEM. JOHNSON: So, some sort of language to  
15 indicate that it's intended that the certifier does the work,  
16 not the producer.

17          CHAIR POWELL-PALM: Love that.

18          BD. MEM. JOHNSON: And then the last would be, in  
19 that parenthetical that says "(geocodes)," to make it a little  
20 bit longer and say, "e.g. geocodes, parcel numbers, street  
21 address legal address," so that if someone's just looking at  
22 this recommendation and not reading the discussion that's right  
23 above it, you still know that those are acceptable forms of  
24 location information.

25          CHAIR POWELL-PALM: Now, I'm just --

1 SECRETARY BRUCH: Thanks.

2 CHAIR POWELL-PALM: -- looking at --

3 SECRETARY BRUCH: Our resident Legal Eagle. Thank  
4 you. No, that's -- that's helpful because I think there was  
5 additional need for clarity there.

6 CHAIR POWELL-PALM: I'm looking for the  
7 parliamentarian to tell me --

8 SECRETARY BRUCH: Hey, are these --

9 CHAIR POWELL-PALM: -- if we have to go --

10 SECRETARY BRUCH: -- substantive changes?

11 CHAIR POWELL-PALM: Yeah, are these substantive  
12 changes? I defer to you, Allison; are these substantive  
13 changes?

14 BD. MEM. JOHNSON: I think they're clarifying  
15 amendments.

16 CHAIR POWELL-PALM: I agree. All right, so let's  
17 see. Okay, and we can have this -- a cover sheet, as well, but  
18 it would read, Allison, if I've got you right, "The CACS  
19 recommends that the NOP advise all accredited certifiers to  
20 record consistent location information, e.g. geocodes, parcel  
21 location -- or parcel location, legal parcel ID, that can lead  
22 to GPS coordinates of all applicants for certification and  
23 certified operations (parcels, production units, grower groups,  
24 handling locations, importers, brokers, et cetera). This will  
25 result in harmony -- harmonization of location data of all

1 parcels, enabling certifiers to streamline crosschecks and  
2 share information internally between operator, certifier, and  
3 inspector."

4 All right, any discussion? Any questions?

5 BD. MEM. JOHNSON: Again, and I'm not a  
6 parliamentarian, so these are friendly amendments. Do the  
7 motioner and the seconder need to agree to the friendly  
8 amendments?

9 CHAIR POWELL-PALM: Go ahead, Motioner.

10 BD. MEM. JOHNSON: I need my Robert's Rules of Order  
11 book.

12 CHAIR POWELL-PALM: I know.

13 BD. MEM. JOHNSON: Joe gave me one after our first  
14 NOSB meeting together, by the way. Fun fact.

15 CHAIR POWELL-PALM: To cover our bases, let's do  
16 that.

17 SECRETARY BRUCH: Yeah. Yeah, that's fine. As  
18 motioner, I accept these amendments.

19 CHAIR POWELL-PALM: And, as seconder, I accept these  
20 amendments.

21 SECRETARY BRUCH: All right.

22 CHAIR POWELL-PALM: With that, we'll go to the vote.  
23 I think we're going to start with Logan.

24 Waiting for the secretary. Jerry.

25 BD. MEM. D'AMORE: As you probably would do anyway,

1 to let us know which way these votes -- are yes is a no and no  
2 is a yes on this one?

3 CHAIR POWELL-PALM: Yes. For this one, it's going to  
4 be a yes is a yes. Thank goodness. No National List involved.  
5 We're just getting the voting sheet up here real  
6 quick.

7 Logan, your vote please.

8 BD. MEM. PETREY: Yes.

9 CHAIR POWELL-PALM: Carolyn?

10 MS. DIMITRI: Yes.

11 CHAIR POWELL-PALM: Allison?

12 BD. MEM. JOHNSON: Yes.

13 CHAIR POWELL-PALM: Brian?

14 BD. MEM. CALDWELL: Yes.

15 CHAIR POWELL-PALM: Nate?

16 BD. MEM. LEWIS: Yes.

17 CHAIR POWELL-PALM: Dilip?

18 BD. MEM. NANDWANI: Yes.

19 CHAIR POWELL-PALM: Jerry?

20 BD. MEM. D'AMORE: Yes.

21 CHAIR POWELL-PALM: Kyla?

22 MS. SMITH: Yes.

23 CHAIR POWELL-PALM: Amy?

24 SECRETARY BRUCH: Yes.

25 CHAIR POWELL-PALM: Kim?

1 BD. MEM. HUSEMAN: Yes.

2 CHAIR POWELL-PALM: Franklin?

3 BD. MEM. QUARCOO: Yes.

4 CHAIR POWELL-PALM: Wood?

5 BD. MEM. TURNER: Yes.

6 CHAIR POWELL-PALM: And the Chair votes yes.

7 SECRETARY BURCH: Okay, 13 yes, zero no, zero  
8 abstentions, zero recusals, 2 absent. The motion passes.

9 CHAIR POWELL-PALM: Thank you, everybody. Hopefully,  
10 a first step towards a better system.

11 SECRETARY BRUCH: Okay, that concludes the ACS.

12 I didn't get to thank everybody on the front end, our  
13 Subcommittee and the full board, but I do want to thank you on  
14 the tail end. Really appreciate the work all the committee  
15 members put into this semester's work agenda. We -- I think we  
16 have our work cut out for us next semester with our work  
17 agenda, which we'll preview at the end of our board meeting.

18 I also want to thank public commenters. It was  
19 extremely helpful to gain insight in our -- in our work agenda  
20 material with your comments and inputs so keep them coming as  
21 always but thank you so much.

22 And then I think I have one last slide I wanted to  
23 proceed to, real quick. Okay, so today, it's a big day for the  
24 committees that I serve on, but it's also a big day for my son;  
25 he turns 2, so I just wanted to recognize him. And he loves



1 farming already, and it's nothing that Mama taught him, it's  
2 just everything driven by him, but I think he'll be the future  
3 organic farmer in the -- to come, so thank you.

4 CHAIR POWELL-PALM: Could we all sing Beckham a  
5 little happy birthday?

6 SECRETARY BRUCH: Oh, if you do, I'm going to record  
7 it.

8 CHAIR POWELL-PALM: I got you. I got you.

9 SECRETARY BRUCH: Okay.

10 (Chair sings Happy Birthday.)

11 (Applause.)

12 MS. DIMITRI: And Happy Birthing Day to Mama.

13 CHAIR POWELL-PALM: To Amy.

14 MS. DIMITRI: Big part of the process.

15 SECRETARY BRUCH: Thank you. I've got to send that  
16 to all of you. Thank you so much. Really appreciate it, and  
17 I'll turn it back over to the Chair.

18 CHAIR POWELL-PALM: Thank you. I just want to -- I  
19 think it's not lost on anyone that the CACS Subcommittee has  
20 really flourished under Amy's leadership, and we went from a  
21 single meeting a month to two meetings a month, and we have  
22 just been very busy, and so thank you for bringing the energy.  
23 And thank you for every year spending your baby's birthday with  
24 us. We really appreciate that sacrifice. It's not small, so  
25 thank you.

1 (Applause.)

2 SECRETARY BRUCH: Thank you.

3 CHAIR POWELL-PALM: All right, and with that, I  
4 believe we're going to be jumping over to PDS, led by Allison.

5 BD. MEM. JOHNSON: (No audible response.)

6 CHAIR POWELL-PALM: Oh, say that again, Allison.

7 BD. MEM. JOHNSON: (No audible response.)

8 CHAIR POWELL-PALM: We just voted, didn't we?

9 BD. MEM. JOHNSON: Did we just vote?

10 CHAIR POWELL-PALM: Yeah. I hope so. All right,  
11 Allison, the floor is yours.

12 BD. MEM. JOHNSON: Thank you.

13 So, we are a small, but mighty, PDS committee and we  
14 don't have anything to discuss or vote on today. But we are  
15 working toward Policies and Procedures Manual proposal in the  
16 spring that Mindee and Nate Lewis will be leading, so we just  
17 wanted to preview the topics that we're hoping to address.

18 We're going to take on setting board members up for  
19 success and some participation and communication expectations,  
20 making sure that we have clarity there. The meeting formats,  
21 you know, updates to reflect having gone through COVID times  
22 and -- and ways that we may be operating differently now, as  
23 well as just sort of expectations around when it may or may not  
24 be ok to miss meetings. We're going to try to include some  
25 specific areas where we can address diversity, equity, and

1 inclusion as a board, and how we can integrate principles of  
2 DEI into our training and board participation. And then also  
3 be explicit about communication of non-unanimous proposals and  
4 decisions and how we can be really clear to our stakeholders.

5 Separately from the PPM updates, we'll also be  
6 exploring how the Board can engage with the Equity Commission.  
7 We really appreciated the comments in that area, and our  
8 understanding is that there will need to be some formality  
9 around that because it is a Commission of the Secretary of  
10 Agriculture, so we'll be looking to the National Organic  
11 Program to help us navigate building that relationship.

12 I think that's all from us for now.

13 CHAIR POWELL-PALM: Slammin'. If I may give an idea  
14 that I think I've been stewing on for years, but it seems like  
15 we are having some fantastic discussions that are really  
16 outside the National List, and the work were doing the National  
17 List, and I would be so stoked if we might consider adding to  
18 the PPM that if a material is unanimous coming out of  
19 Subcommittee we added to a slate to vote on with the single  
20 vote. If there is dissent, then we vote on it individually,  
21 but just to speed this up so we can keep these great  
22 conversations expanding.

23 Any thoughts from anyone else on that? Carolyn.

24 BD. MEM. DIMITRI: I like that idea, Nate, because  
25 I'm all about efficiencies, but I think maybe in addition to

1 unanimous, we'd also want to make sure there were no strong  
2 public --

3 CHAIR POWELL-PALM: Sure.

4 MS. DIMITRI: -- public comments in opposition of  
5 that particular material being relisted. Okay.

6 CHAIR POWELL-PALM: Yeah, thank you. Wood?

7 BD. MEM. TURNER: Very supportive and I like what  
8 Carolyn is suggesting. I -- I just think it to -- to free up  
9 some time during the meeting to have some of these -- some of  
10 these more, sort of, far reaching, you know, almost  
11 philosophical conver -- questions about sort of what -- what  
12 the future of organic is I think are really important, so I  
13 think that's a nice way to address that issue, too.

14 CHAIR POWELL-PALM: I agree. Kim?

15 BD. MEM. HUSEMAN: Yeah, on that -- that same token,  
16 I would suggest some type of language around being able to  
17 carve out at one person's request --

18 CHAIR POWELL-PALM: Sure. Yeah.

19 BD. MEM. HUSEMAN: -- if there were an item of -- outside of  
20 Subcommittee because we know what -- what the vote takes to get  
21 something to pass, right. That each of the Board members is  
22 given the opportunity to review that -- that consent agenda,  
23 and then it's one person's vote to be able to carve out a  
24 component, if needed.

25 CHAIR POWELL-PALM: Um-hum. Totally agree.

1 BD. MEM. HUSEMAN: So that --

2 CHAIR POWELL-PALM: Yeah, just to get the  
3 conversation started. I think as Rick Greenwood reminded us  
4 every single meeting, this seems like a good idea, and I'd like  
5 to honor that and see if we can put that on PDS' plate to -- to  
6 go forward with.

7 MS. DIMITRI: Well, that's something --

8 SECRETARY BRUCH: Yeah, thank you. We're happy to  
9 try to tackle it.

10 MS. DIMITRI: -- we'll have to talk about.  
11 yeah thank you were happy to try.

12 CHAIR POWELL-PALM: All right, thank you, PDS.  
13 Appreciate it. And thank you for all the leadership on PDS.  
14 It's -- it's taken a lot. We have very interesting challenges  
15 over the last couple of years and we're hoping to address  
16 those.

17 How we doing on a break, folks? Doing all right?  
18 Okay. We're going to move over to crops now, and with that  
19 I'll hand it back to Amy.

20 SECRETARY BURCH: Okay, I will thank the Crops  
21 Committee on the front end. The Crops Subcommittee, really  
22 appreciate the service. We have, I feel like, breathed a lot  
23 of life into the materials review process this past year with  
24 the substances that we have. We've had a lot of extended  
25 conversations on these materials, so I'm looking forward to the

1 discussion with those, with the full board.

2           And I also again want to thank the community.  
3 Appreciate your comments and involvement in the process, as  
4 always. One thing that was a follow-up from our spring  
5 semester was our TR review process. As a Subcommittee, we have  
6 prioritized when we do receive TRs to try to get them reviewed  
7 as quickly as possible. We have an extended time frame in  
8 which it's acceptable for us to review them, but we have  
9 prioritized as a Subcommittee to try to get those reviewed  
10 quicker so they're available to stakeholders as soon as they  
11 can be. So that was a follow-up and good feedback from the  
12 community.

13           So, without further ado, we have one proposal to  
14 start off with, and then we'll go to the National List items  
15 after that. That proposal is on potassium sorbate. It's got a  
16 few slides to walk through here, and then a couple comments.

17           So, potassium sorbate, I have it abbreviated as "KS,"  
18 is petitioned to -- for two uses; it's synthetic and is  
19 petitioned to be used as an insecticide, and also petitioned to  
20 be used as disease control. And the main method of -- of  
21 effectiveness is contact. There is no residual with this --  
22 with this product. This is just a list -- the summary list of  
23 KS.

24           So, potassium sorbate's history. It is currently  
25 allowed on the National List, under the synthetic -- as a

1 synthetic inert ingredient, so it is found in some of the  
2 products that are available for organic producers currently.  
3 And EPA has listed it as a -- on a list for a minimal risk  
4 inert ingredient. FDA has it listed as grass. And  
5 internationally, currently it's not accepted for this  
6 petitioned use. It's been previously petitioned three other  
7 times for different reasons.

8           Environmental and health impact. So, this is similar  
9 data from the last time. If you guys remember right, potassium  
10 sorbate with our TR, it was a great TR but at the end of the  
11 day we learned that there's just not a lot of information in  
12 regards to this particular substance, this particular material  
13 in this regard, so our information with potassium sorbate  
14 really relates to its use as a food preservative. So, we  
15 requested information from the community over the last year,  
16 and also -- and actually, the Petitioner responded and provided  
17 us with some additional information, which we reviewed in  
18 Subcommittee.

19           One thing that was notable that the Petitioner did  
20 mention, is that this product, because it's going to be applied  
21 through -- or via full year application, will have minimal soil  
22 interaction, was the comment because concerns environmentally  
23 stem from just inhibiting growth of soil micro --  
24 microorganisms, increase and pH, impacting bacterial  
25 communities.

1           Also, there was some comments with just its sub  
2 products. So, potassium sorbate, when it breaks down, the  
3 degradation of the products is more hazardous than the product  
4 itself. So, sorbic acid, this is one thing to note, is  
5 reported to have synergistic effects with sodium nitrate and  
6 form direct acting mutagens.

7           In summary, the -- the Subcommittee reviewed this and  
8 for various reasons listed below with our off-product criteria,  
9 this is where we netted out that potassium sorbate is not made  
10 from renewable resources, materials used to produce potassium  
11 sorbate are not recyclable, it doesn't complement the use of  
12 natural and biological controls. Many alternative substances  
13 do exist; I had a slide last time that showed, I think there  
14 was over nine different products out there that are already  
15 approved. They're approved as synthetic to be used. There's  
16 some biological controls that folks are using for insect  
17 control and disease control. There's also cultural practices  
18 and different -- different practices deployed on the farm to  
19 try to mitigate substances, so that one came through with just  
20 a lot of alternatives.

21           The Petitioner did respond that the idea with  
22 potassium sorbate could be to reduce the dependency of  
23 substances, such as copper and sulfur, which is notable. The  
24 efficacy data that we did receive from the Petitioner did not  
25 show that they were testing the -- the strength of potassium



1 sorbate versus copper or versus sulfur, but it was interesting  
2 to note that it could be used as a replacement. Just in  
3 general though, more research ultimately is needed.

4           The Petitioner responded just because it's on -- it's  
5 been really reviewed regular -- regulatory many times through  
6 FDA and EPA that he doesn't really anticipate more information  
7 going into understanding its environment -- environmental or  
8 health impacts.

9           So, when we look at public comments for this  
10 substance, let me just pull up my summary, we had seven written  
11 comments and two oral comments. So, two activist groups, one  
12 certifier, one advocacy group, and two grower groups said -- or  
13 sorry, two activist groups, one certifier, and one advocacy  
14 group said no for it -- for its use as an insecticide, and also  
15 a fungicide. Two grower groups during oral comments were asked  
16 and they were in support of it in the spring. Their response  
17 in the fall was they just -- they didn't have a push from  
18 farmers to actually want to have this product as an option, so  
19 they -- they just didn't necessarily support this anymore. Two  
20 grower groups said yes for the allowance for disease control,  
21 but not for use as an insecticide. And one grower group said  
22 yes to -- to its use in both fashions. So potentially where  
23 the grower groups were saying about yes to disease control is  
24 because it does -- the Petitioner said it does target powdery  
25 mildew, and we hear from growers that that is a substance

1 that's really challenging. Even conventional farmers are  
2 challenged by powdery mildew, so this has a potential to help  
3 with that in -- in a variety of different crops. More than  
4 one. And as an insecticide, the groups that said yes to  
5 disease control but no to insecticide, they just didn't think  
6 that the mode of action was really that strong for its use as  
7 an insecticide.

8 I'm just going to turn -- I know in Subcommittee  
9 Logan and Brian had some additional comments on the efficacy  
10 data. I don't know if you guys have anything you want to add  
11 to this before we open it up?

12 BD. MEM. PETREY: Sure. Thank you, yes.

13 So looking at, from the Petitioner, the -- the  
14 studies that were conducted, we did not see, like you  
15 mentioned, the sulfur or the copper to be compared with. We  
16 did see kaligreen, which is potassium bicarbonate, which is on  
17 the list. It did -- so it performed better than the potassium  
18 bicarbonate.

19 And also, you know, kind of to go back to the  
20 application on the label of kaligreen, it actually says do not  
21 using chemigation water, so it is strictly a foliar application  
22 so were not getting that soil contact. That may, you know,  
23 inhibit growth of soil microbes. But the -- the data again, it  
24 was -- it was kind of hard to -- to justify or to say that it  
25 is better than our alternatives now that we do have, because

1 only -- and it was using its oxidate, as well, which I'm -- I'm  
2 not a big oxidate user in season. Almost a sterilizer and --  
3 and can kind of make things blow up, at least is what I've  
4 seen. And so also, you had to put almost as much acidifier in  
5 the tank mix with it as you did the product itself, and you saw  
6 it was almost like twice as good if you put a one-to-one ratio  
7 within an acidifier than it was if it was 1/2 ratio.

8 So, I guess that's -- that's my comments on the data.

9 SECRETARY BRUCH: Yeah, thank you, Logan. I  
10 appreciate that review.

11 Brian, did you have anything to add before I open it  
12 up?

13 BRIAN CALDWELL: No. I think that you two have done  
14 a great job of covering those things.

15 SECRETARY BRUCH: Okay, thank you. I'll turn it back  
16 over to the Chair.

17 CHAIR POWELL-PALM: All right, any other questions or  
18 comments for Amy?

19 (No response.)

20 CHAIR POWELL-PALM: Okay, with that, we'll go to the  
21 vote. And for this, it's a petition to add it to the National  
22 List, so a "No" will keep it off the list, a "Yes" --

23 MS. SMITH: Yeah.

24 CHAIR POWELL-PALM: Oh, thank you, sorry. Got to  
25 read in. Sure. Yeah.

1           So, the first motion, to classify potassium sorbate  
2 as synthetic. The motion was made by Amy Bruch and seconded by  
3 Mindee Jeffrey. Out of Subcommittee, 7 yeses and 1 absent.

4           So, first, we will vote to classify it as a board.  
5 And we're going to start with Caroline, so the motion to  
6 classify potassium sorbate as synthetic.

7           MS. DIMITRI: Yes.

8           CHAIR POWELL-PALM: Allison?

9           BD. MEM. JOHNSON: Yes.

10          CHAIR POWELL-PALM: Brian?

11          BD. MEM. CALDWELL: Yes.

12          CHAIR POWELL-PALM: Nate?

13          BD. MEM. LEWIS: Yes.

14          CHAIR POWELL-PALM: Dilip?

15          BD. MEM. NANDWANI: Yes.

16          CHAIR POWELL-PALM: Jerry?

17          BD. MEM. D'AMORE: Yes.

18          CHAIR POWELL-PALM: Kayla?

19          MS. SMITH: Yes.

20          CHAIR POWELL-PALM: Amy?

21          SECRETARY BRUCH: Yes.

22          CHAIR POWELL-PALM: Kim?

23          BD. MEM. HUSEMAN: Yes.

24          CHAIR POWELL-PALM: Franklin?

25          BD. MEM. QUARCOO: Yes.

1 CHAIR POWELL-PALM: Wood?

2 BD. MEM. TURNER: Yes.

3 CHAIR POWELL-PALM: Logan?

4 BD. MEM. PETREY: Yes.

5 CHAIR POWELL-PALM: And the Chair votes yes.

6 SECRETARY BRUCH: Okay, 13 yes, zero no, zero  
7 abstentions, zero recusals, 2 absent. The motion passes.

8 CHAIR POWELL-PALM: All right, so we're now going to  
9 move to the motion to add potassium sorbate to the National  
10 List at 205.601(e), synthetic substances allowed to use in  
11 organic crop production as insecticides. Out of Subcommittee,  
12 the motion was made by Amy Bruch and seconded by Logan Petrey,  
13 and we're going to start with Allison, full circle now.

14 BD. MEM. JOHNSON: No.

15 CHAIR POWELL-PALM: Brian?

16 BD. MEM. CALDWELL: No.

17 CHAIR POWELL-PALM: Nate?

18 BD. MEM. LEWIS: No.

19 CHAIR POWELL-PALM: Dilip?

20 BD. MEM. NANDWANI: No.

21 CHAIR POWELL-PALM: Jerry?

22 BD. MEM. D'AMORE: No.

23 CHAIR POWELL-PALM: Kyla?

24 MS. SMITH: No.

25 CHAIR POWELL-PALM: Amy?

1 SECRETARY BRUCH: No.

2 CHAIR POWELL-PALM: Kim?

3 BD. MEM. HUSEMAN: No.

4 CHAIR POWELL-PALM: Franklin?

5 BD. MEM. QUARCOO: No.

6 CHAIR POWELL-PALM: Wood?

7 BD. MEM. TURNER: No.

8 CHAIR POWELL-PALM: Logan?

9 BD. MEM. PETREY: No.

10 CHAIR POWELL-PALM: Carolyn?

11 MS. DIMITRI: No.

12 CHAIR POWELL-PALM: And the Chair votes no.

13 SECRETARY BRUCH: Okay, that's zero yes, 13 no, zero  
14 abstentions, zero recusals, and 2 absent. The motion fails.

15 CHAIR POWELL-PALM: And I'll hand it back to you,  
16 Amy.

17 SECRETARY BRUCH: We have to --

18 CHAIR POWELL-PALM: Oh, we do. The last motion, I  
19 just can't get enough of this stuff, motion to add potassium  
20 sorbate to the National List, at 601(i), synthetic substances  
21 allowed for use in organic crop production as plant disease  
22 control. We're going to start with Brian for this vote.

23 BD. MEM. CALDWELL: No.

24 CHAIR POWELL-PALM: Nate?

25 BD. MEM. LEWIS: No.

1 CHAIR POWELL-PALM: Dilip?

2 BD. MEM. NANDWANI: No.

3 CHAIR POWELL-PALM: Jerry?

4 BD. MEM. D'AMORE: No.

5 CHAIR POWELL-PALM: Kyla?

6 MS. SMITH: No.

7 CHAIR POWELL-PALM: Amy?

8 SECRETARY BRUCH: No.

9 CHAIR POWELL-PALM: Kim?

10 BD. MEM. HUSEMAN: No.

11 CHAIR POWELL-PALM: Franklin?

12 BD. MEM. QUARCOO: No.

13 CHAIR POWELL-PALM: Wood?

14 BD. MEM. TURNER: No.

15 CHAIR POWELL-PALM: Logan?

16 BD. MEM. PETREY: No.

17 CHAIR POWELL-PALM: Carolyn?

18 MS. DIMITRI: No.

19 CHAIR POWELL-PALM: Allison?

20 BD. MEM. JOHNSON: No.

21 CHAIR POWELL-PALM: The Chair votes no.

22 SECRETARY BRUCH: Zero yes, 13 no, zero abstention,  
23 zero recusals, 2 absent. The motion fails.

24 CHAIR POWELL-PALM: I think now we can lay potassium  
25 sorbate to rest for the agenda. Back to you, Amy.

1           SECRETARY BRUCH: Okay, thanks for your help, Nate.

2           With that, and multitasking, I'm never good at that,  
3 anyway, we are going to kick things off with our Sunsets. I  
4 will advance the slide.

5           So, first up we have our Alcohols, and if Logan's  
6 okay with this, we can review them -- I'm seeing a headshake --  
7 we'll review them in tandem, but I'll read them both in -- into  
8 the record.

9           So, first one that we'll be loading on and  
10 discussing, along with isopropanol is ethanol, so that's  
11 205.601 [sic], and it's at (a)(1)(i), ethanol. Go ahead -- oh  
12 sorry, and then I'll read the next one real quick, and then  
13 we'll go to Logan. So, the next one is 205.601 [sic], and this  
14 is (a)(1)(ii), isopropanol. Go ahead, Logan.

15           BD. MEM. PETREY: Okay, so both of these are  
16 sanitizers and disinfectants used for harvest equipment  
17 cleaning, equipment cleaning, irrigation system cleaning. It's  
18 widely accepted internationally as approved synthetic for its  
19 use. These materials are considered non-toxic and are  
20 biodegradable, and are not used in quantities that could cause  
21 smog or pollution. There's broad support in the written and  
22 oral -- or written comment, we didn't have any oral comments in  
23 both spring and fall, for its relisting, and the commenters say  
24 that these materials are efficacious, they're cost effective,  
25 and easy to get in rural areas.



1           One of the quotes, just to -- just to back that or  
2 one of the comments was growers mentioned that they  
3 specifically value allowance of these because these materials  
4 are generally available in rural areas and can be obtained  
5 easily when needed without waiting for ordering and delivering.

6           CHAIR POWELL-PALM: Questions or comments for Logan  
7 on this material?

8 (No response.)

9           CHAIR POWELL-PALM: All right, we'll go to the votes.

10          SECRETARY BRUCH: Sorry. The motion is to remove  
11 isopropyl -- isopropanol -- oh, maybe we'll start with ethanol,  
12 sorry. The motion is to remove ethanol from the National List,  
13 and that was motioned by Logan and seconded by Brian Caldwell.  
14 And remember, this is a yes vote removes it from the National  
15 List, a no vote maintains it on the list.

16          CHAIR POWELL-PALM: All right, I think we're starting  
17 with Nate this time.

18          BD. MEM. LEWIS: No.

19          CHAIR POWELL-PALM: Dilip?

20          BD. MEM. NANDWANI: No.

21          CHAIR POWELL-PALM: Jerry?

22          BD. MEM. D'AMORE: No.

23          CHAIR POWELL-PALM: Kyla?

24          MS. SMITH: No.

25          CHAIR POWELL-PALM: Amy?

1 SECRETARY BRUCH: No.

2 CHAIR POWELL-PALM: Kim?

3 BD. MEM. HUSEMAN: No.

4 CHAIR POWELL-PALM: Franklin?

5 BD. MEM. QUARCOO: No.

6 CHAIR POWELL-PALM: Wood?

7 BD. MEM. TURNER: No.

8 CHAIR POWELL-PALM: Logan?

9 BD. MEM. PETREY: No.

10 CHAIR POWELL-PALM: Carolyn?

11 MS. DIMITRI: No.

12 CHAIR POWELL-PALM: Allison?

13 BD. MEM. JOHNSON: No.

14 CHAIR POWELL-PALM: Brian?

15 BD. MEM. CALDWELL: No.

16 CHAIR POWELL-PALM: And the Chair votes no. I'm so  
17 excited for this slate that's coming. All right next one.

18 SECRETARY BRUCH: Okay, so that was zero yes, 13 no,  
19 zero abstention, zero recusals, 2 absent. The motion fails.

20 And we're going to be voting for isopropanol next.  
21 So, the motion is to remove isopropanol from the National List.  
22 Motion was made by Logan Petrey, seconded by Amy Bruch.

23 CHAIR POWELL-PALM: We're going to start the voting  
24 with Dilip.

25 BD. MEM. NANDWANI: No.

1 CHAIR POWELL-PALM: Jerry?

2 BD. MEM. D'AMORE: No.

3 CHAIR POWELL-PALM: Kyla?

4 MS. SMITH: No.

5 CHAIR POWELL-PALM: Amy?

6 SECRETARY BRUCH: No.

7 CHAIR POWELL-PALM: Kim?

8 BD. MEM. HUSEMAN: No.

9 CHAIR POWELL-PALM: Franklin?

10 BD. MEM. QUARCOO: No.

11 CHAIR POWELL-PALM: Wood?

12 BD. MEM. TURNER: No.

13 CHAIR POWELL-PALM: Logan?

14 BD. MEM. PETREY: No.

15 CHAIR POWELL-PALM: Carolyn?

16 MS. DIMITRI: No.

17 CHAIR POWELL-PALM: Allison?

18 BD. MEM. JOHNSON: No.

19 CHAIR POWELL-PALM: Brian?

20 BD. MEM. CALDWELL: No.

21 CHAIR POWELL-PALM: Nate?

22 BD. MEM. LEWIS: No.

23 CHAIR POWELL-PALM: And the Chair votes no.

24 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
25 zero recusals, 2 absent. The motion fails.

1 CHAIR POWELL-PALM: On the agenda we have noted that  
2 Mindee behind sodium carbonate peroxyhydrate [sic], but  
3 Franklin is going to be presenting her Sunsets.

4 BD. MEM. QUARCOO: Thanks.

5 CHAIR POWELL-PALM: We'll have Amy read it in real  
6 quick, and then hand it over to you.

7 BD. MEM. QUARCOO: Okay.

8 SECRETARY BRUCH: So, we are at 205.601(a)(8) sodium  
9 carbonate peroxyhydrate. Federal law restricts the use of the  
10 substance in food crop production to approved food uses  
11 identified on the product label.

12 Go ahead Franklin, and thank you.

13 BD. MEM. QUARCOO: So, it is registered as an  
14 algicide, disinfectant, and sanitizer, and for irrigation  
15 system cleaning. Its uses to which it's approved are target  
16 pests, algae, moss, and slime molds.

17 When it comes to international acceptance, in some  
18 places it is -- it -- the -- are listed but the product itself  
19 is not. In other places, it's not listed.

20 And then when it comes to the environmental issue --  
21 issues, there are emissions into the environment that could  
22 happen during production, formulation, and a few other  
23 processes. It can have -- it is listed as unable to have  
24 negative impacts on fish, birds, and bees but a closer read on  
25 that, it depends upon when it's created; that timing is chosen

1 correctly it -- it will not have those impact -- impacts. So,  
2 there are a few of those non-target organism issues concerning  
3 that.

4           The Subcommittee discussed it and some of the  
5 breakdown products, water and oxygen, some -- some of the  
6 people who made comments said that some of the breakdown  
7 products, water and oxygen, are more favorable than the  
8 elemental copper that has -- is a copper sulfate, which it is  
9 supposed to replace. And it's also said to have fewer  
10 corrosion issues.

11           And then when you look at public comments, a number  
12 of comments were for releasing it with a couple of notable  
13 details. Some people talked about the fact that it -- it was  
14 not being used; even though it was supposed to replace copper  
15 sulphate it was not being used like it should, like in the  
16 number of people using it. And they said it was way better.  
17 It had way better performance than cooper sulfate.

18           Let's see, so the Subcommittee finds it's well -- at  
19 the Subcommittee level it was considered compliant with Organic  
20 Food Production Act, and we are here to see what the whole  
21 board thinks.

22           CHAIR POWELL-PALM: All right, well thank you very  
23 much for taking this on, on short notice. Really appreciate as  
24 a first year taking one for the team, and helping us out with  
25 this one. We appreciate it.

1 Questions for Franklin? Nate, please go ahead.

2 BD. MEM. LEWIS: I think it's more for the -- the  
3 Subcommittee; was there discussion about the annotation? I just  
4 want to put in the record I don't like that annotation because  
5 I think it applies to every pesticide that is governed by  
6 FIFRA, so is there any discussion about why we have that in  
7 this one? And if not, I just want to make sure that my dislike  
8 of it is recorded.

9 CHAIR POWELL-PALM: Noted.

10 SECRETARY BRUCH: Thank you for that comment. I  
11 don't -- I am just recalling our Subcommittee discussion; I  
12 don't think we tackled the annotation, how broad it is, but I  
13 think it's good to put that on the record. Okay.

14 CHAIR POWELL-PALM: All right, no comments or other  
15 questions, we'll go to the vote, and were going to start with  
16 Jerry. Oh, please read the motion, sorry.

17 SECRETARY BRUCH: Okay, motion to remove sodium  
18 carbon --carbonate peroxyhydrate from the National List. The  
19 motion was made by Mindee Jeffrey and seconded by Brian  
20 Caldwell.

21 CHAIR POWELL-PALM: Jerry, your vote please.

22 BD. MEM. D'AMORE: No.

23 CHAIR POWELL-PALM: Kyla?

24 MS. SMITH: No.

25 CHAIR POWELL-PALM: Amy?

1 SECRETARY BRUCH: No.

2 CHAIR POWELL-PALM: Kim?

3 BD. MEM. HUSEMAN: No.

4 CHAIR POWELL-PALM: Franklin?

5 BD. MEM. QUARCOO: No.

6 CHAIR POWELL-PALM: Wood?

7 BD. MEM. TURNER: No.

8 CHAIR POWELL-PALM: Logan?

9 BD. MEM. PETREY: No.

10 CHAIR POWELL-PALM: Carolyn?

11 MS. DIMITRI: No.

12 CHAIR POWELL-PALM: Allison?

13 BD. MEM. JOHNSON: No.

14 CHAIR POWELL-PALM: Brian?

15 BD. MEM. CALDWELL: No.

16 CHAIR POWELL-PALM: Nate?

17 BD. MEM. LEWIS: No.

18 CHAIR POWELL-PALM: And Dilip?

19 BD. MEM. NANDWANI: No.

20 CHAIR POWELL-PALM: And the Chair votes no.

21 SECRETARY BRUCH: Okay, ok that's zero yes, 13 no,  
22 zero recusals, zero abstentions, and 2 absent. The motion  
23 fails.

24 Okay, next on the list, we have two listings for Wood  
25 here, and they're in regards to newspaper, so we'll tackle the

1 review of both of them and vote just sequentially on that. So,  
2 we're at 205.601, synthetic substances allowed for use in  
3 organic crop production, we're at (b)(2)(i), newspaper or other  
4 recycled paper without glossy or colored ink. And we're also  
5 at (b)(2)(i), which is newspaper or other recycled materials  
6 without glossy or colored ink.

7 BD. MEM. LEWIS: And at (c); at 601(c), compost  
8 feedstocks. That's because you said the same thing.

9 SECRETARY BRUCH: Yes.

10 BD. MEM. LEWIS: Okay.

11 SECRETARY BRUCH: Okay.

12 CHAIR POWELL-PALM: Go ahead.

13 BD. MEM. LEWIS: Sorry. Great. So, so thanks for  
14 reading those. We have well-known material, newspaper and --  
15 and other recycled paper. I think the biggest issue with this  
16 material has been how to -- that -- that the listing is glossy  
17 or colored inks, very difficult to actually manage around  
18 those -- around those issues in -- in a number of different  
19 contexts.

20 I mean, it's -- the materials being used, newspapers  
21 being used for weed suppression or as a weed barrier, for  
22 example, you know, the -- the newspaper is breaking down and --  
23 and getting -- getting -- degrading into soil. Similarly, on  
24 the compost side of things, the use of this material as a -- as  
25 a compost feedstock, as we discussed in our spring meeting, is



1 that given the fact that municipal compost is allowed within  
2 organic -- organic production and could include newspaper that  
3 may have some of these inks, it just -- it becomes a difficult  
4 issue to -- to fully -- to fully understand sort of how this  
5 gets managed. And I think some of the -- some of the -- the  
6 comments from the community I think were recognizing that the  
7 listing that just that just focuses on glossy or colored inks  
8 and doesn't -- doesn't focus on the materials that are in those  
9 glossy and colored inks. The things that you talked about,  
10 Brian, yesterday, the -- the materials that are commonly in  
11 plastics and other -- other petroleum-based products sort of  
12 raises some -- some issues.

13           So, you know, we had a, I think, a healthy discussion  
14 about this in the spring. The feedback from the community is  
15 pretty clear and we've heard from grower groups, we've heard  
16 from consultants, we've heard from trade associations, we've  
17 heard from certifiers, we've heard from nonprofits and  
18 coalitions, in -- in general that retailers, in general that --  
19 that there's either support for or no opposition to the  
20 relisting of the material.

21           There were some -- a lot of healthy and careful reads  
22 of the prior TR on this from 2017, just to sort of elevate some  
23 of the issues that are focus -- that -- that are that are part  
24 of some of these -- these inks that are -- that are of so much  
25 concern. There has been a call for a limited scope

1 supplemental TR to sort of go deeper into this perhaps in the  
2 future, but  
3 no -- no opposition to relisting the material. Again, I want  
4 to be clear, that there was -- there were some that supported  
5 continuing to relist it and some that just simply did not  
6 oppose the relisting. I just want to be clear about that  
7 language.

8           There was general feedback from certifiers that  
9 members are using this -- using this material in their --  
10 listing this in their OSPs. We -- we had asked some questions  
11 about sort of thinking about potentially annotating this  
12 differently; there was not really any feedback around changing  
13 this annotation or updating the annotation today. A lot of --  
14 a lot of focus on supporting growers who are small scale or  
15 transitioning who have really relied on this material. So, I  
16 think that outlines most of the issues, unless there's any  
17 questions.

18           CHAIR POWELL-PALM: Questions for Wood? Brian,  
19 please go ahead.

20           BD. MEM. CALDWELL: Yeah, thanks Wood. And I think  
21 that -- that issues with -- with paper and -- and recycled  
22 paper and newspaper goes a little bit farther than just what's  
23 in the inks. And now, I believe there are actually sort of  
24 plasticized paper that that -- that I get in the mail and those  
25 kind of places, and I'm concerned about the -- the materials

1 that can be in them. I think it's -- there's a little bit of a  
2 Pandora's Box and -- and back in the day when I think this  
3 was -- this was, you know, originally put on the list and --  
4 and even before the -- the NOP existed, it was allowed in  
5 organic systems in the -- some of the state certification  
6 programs and it -- newspaper and recycled paper was a different  
7 thing back then, it's -- really has evolved over time.

8           So, I think my feeling is on this that -- that I  
9 would like us to -- to -- to hold the possibility of -- of  
10 adding an annotation to this through our new process, which I'm  
11 looking forward to, and seeing if we could deal with -- with  
12 the, you know, the thiolates and the other things that might be  
13 in there and just what might be considered plasticized paper.  
14 So, I just -- I just wanted to kind of put that out there.

15           Another question I have, which I -- I should know the  
16 answer to, and I don't, and does this include cardboard? Is  
17 that -- is that under this?

18           BD. MEM. LEWIS: It does.

19           BD. MEM. CALDWELL: Okay, great. So, yeah that's --  
20 that's it. Thanks.

21           BD. MEM. LEWIS: Thanks for that. I appreciate that  
22 clarify --that -- that additional -- that additional point.  
23 And I would say that the fact that the compost is on our work  
24 agenda, as well, gives us a great opportunity to really address  
25 some of those issues, at least in that particular part of the -

1 - that particular listing, so.

2 CHAIR POWELL-PALM: Other questions or comments?

3 (No response.)

4 CHAIR POWELL-PALM: All right. The compost work  
5 agenda can't come soon enough it seems like.

6 BD. MEM. LEWIS: It seems like it.

7 CHAIR POWELL-PALM: A lot of questions. Amy, I'll  
8 hand it to you to read the motion.

9 SECRETARY BRUCH: Yeah, no problem. And thanks,  
10 Wood, for correcting me. I noticed we don't have a slide for  
11 the next listing, so I'm going to read that out of the book to  
12 make sure that's in the record.

13 BD. MEM. LEWIS: Oh, yeah.

14 SECRETARY BRUCH: But, we do have this listing so  
15 we're going to be voting on 205.601(b)(2)(1) right now, the  
16 motion to remove newspaper or other recycled -- or other  
17 recycled paper without glossy or colored things from the  
18 National List. The motion was made by Wood Turner, seconded by  
19 Mindee Jeffrey.

20 CHAIR POWELL-PALM: And we're going to start the vote  
21 with Kyla.

22 MS. SMITH: No.

23 CHAIR POWELL-PALM: Amy?

24 SECRETARY BRUCH: No.

25 CHAIR POWELL-PALM: Kim?

1 BD. MEM. HUSEMAN: No.

2 CHAIR POWELL-PALM: Franklin?

3 BD. MEM. QUARCOO: No.

4 CHAIR POWELL-PALM: Wood?

5 BD. MEM. TURNER: No.

6 CHAIR POWELL-PALM: Logan?

7 BD. MEM. PETREY: No.

8 CHAIR POWELL-PALM: Carolyn?

9 MS. DIMITRI: No.

10 CHAIR POWELL-PALM: Allison?

11 BD. MEM. JOHNSON: No.

12 CHAIR POWELL-PALM: Brian?

13 BD. MEM. CALDWELL: No.

14 CHAIR POWELL-PALM: Nate?

15 BD. MEM. LEWIS: No.

16 CHAIR POWELL-PALM: Dilip?

17 BD. MEM. NANDWANI: No.

18 CHAIR POWELL-PALM: Jerry?

19 BD. MEM. D'AMORE: No.

20 CHAIR POWELL-PALM: And Chair votes no.

21 SECRETARY BRUCH: Okay, zero yes, 13 no, zero  
22 abstentions, zero recusals, 2 absent. The motion fails.

23 Okay, we do have it, yeah. Okay. So, we're going to  
24 be voting on 205.601(c), and this is as compost feedstocks,  
25 newspaper or other recycled paper without glossy or colored

1 inks. So, the motion to remove newspaper or other recycled  
2 materials without glossy or colored inks from the National  
3 List, motioned by Wood Turner, seconded by Jerry.

4 CHAIR POWELL-PALM: And were going to start with you,  
5 Madam Secretary.

6 SECRETARY BRUCH: No.

7 CHAIR POWELL-PALM: Kim?

8 BD. MEM. HUSEMAN: No.

9 CHAIR POWELL-PALM: Franklin?

10 BD. MEM. QUARCOO: No.

11 CHAIR POWELL-PALM: Wood?

12 BD. MEM. TURNER: No.

13 CHAIR POWELL-PALM: Logan?

14 BD. MEM. PETREY: No.

15 CHAIR POWELL-PALM: Carolyn?

16 MS. DIMITRI: No.

17 CHAIR POWELL-PALM: Allison?

18 BD. MEM. JOHNSON: No.

19 CHAIR POWELL-PALM: Brian?

20 BD. MEM. CALDWELL: I abstain on this one.

21 CHAIR POWELL-PALM: Nate?

22 BD. MEM. LEWIS: No.

23 CHAIR POWELL-PALM: Dilip?

24 BD. MEM. NANDWANI: No.

25 CHAIR POWELL-PALM: Jerry?

1 BD. MEM. D'AMORE: No.

2 CHAIR POWELL-PALM: Kyla?

3 MS. SMITH: No.

4 CHAIR POWELL-PALM: And the Chair votes no.

5 SECRETARY BRUCH: Okay, zero yes, 12 no, 1  
6 abstention, zero recusals, 2 absent. The motion fails.

7 CHAIR POWELL-PALM: Okay.

8 SECRETARY BRUCH: All right, Logan, we're up -- up to  
9 you next, so were looking at 205.601(b)(2)(ii) plastic mulch  
10 and covers, (petroleum-based other than polyvinyl  
11 chloride(PVC)).

12 BD. MEM. PETREY: Okay, all right, this material is  
13 also listed in OFPA under 6508(c)(2), the crop management --  
14 the prohibited -- prohibited crop production practices and  
15 materials under crop management, and it states that that  
16 plastic mulch is prohibited unless it is removed at the end of  
17 the growing season, and so therefore it is also found at  
18 205.206(c)(6) "Plastic or synthetic mulches: provided, that,  
19 they are removed from the end -- from the field at the end of  
20 the growing or harvest season."

21 Plastic mulches. They, and covers, they have  
22 multiple functions. Examples: weed management, soil warming,  
23 insect management, disease management, slow moisture and  
24 nutrient retention, and frost protection. Crops predominantly  
25 grown in plastic culture are high-value vegetable and fruit

1 crops. Some of these organic crops are almost exclusively  
2 grown on plastic beds, including tomatoes, peppers, cucurbits,  
3 egg plants, and strawberries.

4 In public comments, many growers, certifiers, and  
5 other organic coalition groups started -- stated the current  
6 essentiality of this material, along with some with concern of  
7 the dependency of this material. One of the commenters from  
8 the fall written comments states, "We support the continued  
9 listing of plastic mulch and covers while we also appreciate  
10 the desire to move away from disposable plastic products in  
11 organic production."

12 International acceptances. Canadian standards have  
13 similar annotations of removal and restriction of PVC. And the  
14 EU.

15 There's two listings for the plastic mulches. You  
16 have one similar to our mulch, and is CSNEN13655. And then  
17 there has been a new one, I guess, since 2018, that actually  
18 does allow the biodegradable mulch films for use in organic and  
19 horticulture, but requirements for test methods. And so that's  
20 really on the biodegradable side, but I didn't want to add that  
21 in.

22 So, environmental concerns for this product.  
23 Environmental concerns of this product includes soil and water  
24 contamination, and the limitations to recycling. Because the  
25 debris of plastic mulch and covers is very dirty at the end of



1 the season most is not recycled.

2           Also, we have heard from some commenters that there  
3 are not many recycling facilities that can handle this  
4 material, which also adds to the limitations. There's much  
5 concern of -- in the community of the breakdown of this  
6 material. Practically, plastic mulch in the soils and the  
7 water. One of the commenters stated, "In essence, this is a  
8 lose-lose situation, whereby the use of mulch increases plastic  
9 contamination in our environment, but the delisting of the  
10 material would be a serious consequence to many organic  
11 growers. For human health there is concern for PFOS and  
12 thiolates contamination on food grown on plastic mulch.

13           In the written comments this fall, there was one  
14 comment duplicated more than 10 times, and another duplicated  
15 about 10 times; both comments opposed the relisting of plastic  
16 mulch, stating the need to remove microplastic contaminations  
17 from food. One of those comments did list -- did list five  
18 proposed implementations for the Board. One of them was to:  
19 place the entire class of PFOS chemicals on the Prohibited  
20 Substance List; to phased out fluorinated plastic containers  
21 and packaging; phase out all fossil fuel-based plastic  
22 containers and packaging; phase out all plastic mulch and traps  
23 for growing; compile and post in Federal Register a list of all  
24 inert ingredients used in organic and begin evaluating them.

25           Also, in that comment listed a study of the PFOS

1 chemicals found in organic kale. I did read the study. I did  
2 look at that. What I did notice is -- is the commenters were  
3 right; there is -- there was no -- there wasn't a significant  
4 difference between organic and conventional kale, but there was  
5 a significant difference between kale that was in packaging and  
6 loose leaf kale. And kale is not predominantly grown on  
7 plastic mulch, and so but there was no -- these -- these  
8 samples were pulled straight from the grocery store without  
9 knowing the grower practices, so we don't know whether they  
10 were grown in plastic mulch or not. This is strictly -- the  
11 only identifier I could find was the packaging material. So, I  
12 encourage people when conducting these straw studies to  
13 identify commonalities in their review of things, like plastic  
14 packaging.

15 Alternatives. Based on this material, because it has  
16 many functions, it is likely that different alternatives would  
17 be needed for each function. For example, cultivation would  
18 not assist in soil warming or provide insect reflective  
19 barrier. More hand weeding would not increase water nutrient  
20 or soil retention. Biodegradable mulch is understood to  
21 achieve many of these functions, but the industry does not yet  
22 have a material that complies with the NOSB recommendations.

23 A couple of commenters and stakeholders regarded  
24 alternatives, stating, "We support research in the most cost-  
25 effective labor methods of mulching that could be used in place

1 of BBMF or of plastic mulch. Such research should consider  
2 separately weed suppression and soil warming for which  
3 alternatives may be different. Organic no-till and cover crop  
4 and intercropping practices are in the scope of research.

5 Another commenter said, "We would like the industry  
6 to promote cultivation practices over plastic covers for weed  
7 management, but this is not a viable option for all operations.  
8 Also, plastic much or plastic covers used as mulch for heat  
9 loving plants do not have good alternative. We support more  
10 work being done to identify real alternatives to ensure that  
11 biodegradable product will not contribute to the contamination  
12 of soil and natural resources."

13 Many of the crops I listed at the beginning have  
14 fruits that are subject to being easily bruised or scratched,  
15 that have vining growth habits that spread and prohibit mid to  
16 late season cultivation, or are trellis on structures that are  
17 too tall for equipment -- for cultivation equipment to enter  
18 the field.

19 Other international standards have similar  
20 annotations to plastic mulch, or some do have the biodegradable  
21 mulch.

22 These Crop Subcommittee -- the Crop Subcommittee was  
23 in alignment with many commenters and stakeholders. There's an  
24 understanding of the industry's dependence that is of  
25 frustration in the lack of progress made in the reducing

1 dependency of this material. In general, the comments were  
2 those that were in support were growers and grower groups, zero  
3 percent were -- of consumers were in support, and then of the  
4 opposition zero percent of them were growers, and almost all  
5 were consumers or advocacy groups.

6 And I'm ready for -- to discuss.

7 CHAIR POWELL-PALM: Who the -- whose got a question  
8 for Logan? Let's start on this side, we'll work our way  
9 around. Brian, please go ahead.

10 BD. MEM. CALDWELL: Logan, thanks so much for  
11 reviewing that. You did a great job and -- and I think you --  
12 you summed up the issues really well. And I guess I just want  
13 to repeat what I said on the -- the newspaper one, that -- that  
14 I think I -- I think and hope we can use the -- the annotation  
15 process to -- to start a giant wheel slowly moving maybe  
16 towards dealing with this -- this big environmental problem  
17 that we're all realizing is -- is a big one. So, thanks.

18 CHAIR POWELL-PALM: Let's go to Carolyn next.

19 MS. DIMITRI: I mean, I want to first say I think  
20 it's kind of funny that Logan, when you summarized it, you said  
21 like the growers were supporting and the consumers were against  
22 it, but think of all the packaged plastic products consumers  
23 buy, and I find that to be like so contradictory. It's like I  
24 can buy the plastic, but the farmer can't use it on the farm.  
25 So, there's that one thought.

1           And then the other one is, like I think that we  
2 should also stop thinking about the ability to recycle plastic  
3 as a solution and a direction forward. And I -- I know it's  
4 discussed in here, so I just wanted to throw that out for the  
5 conversation. And thank you for taking on this complicated  
6 topic.

7           BD. MEM. PETREY: And actually, I kind of skipped  
8 over one of the comments, and I was also going to say, based on  
9 the study referenced talking about the PFOS and the kale, I  
10 just encourage the consumers to not buy in plastic, you know,  
11 while that's still an option; buy the loose-leaf kale and --  
12 and, you know, if that's your concern. So, I mean I -- I agree  
13 with you.

14           CHAIR POWELL-PALM: We can go Wood and then Amy.

15           BD. MEM. TURNER: I think it's hard to separate this  
16 whole discussion from the biodegradable -- biobased mulch issue  
17 that we've wrestled with, and I -- I just have come to the  
18 conclusion personally that -- that if we -- I'd rather see the  
19 problem. As I said before, I'd rather see the problem than  
20 hide the problem or biodegrade the problem and not know what  
21 the heck is going on, so I'd rather see the problem and have us  
22 all face it as a community.

23           I hope that the abstentions from -- in the vote in  
24 Subcommittee sent the message to the community as a whole that  
25 this is a big issue. We all should be wrestling with this

1 issue. I -- I think the comments -- the number of comments  
2 reflected that. So, anyway, that's my question -- that's my  
3 point.

4 CHAIR POWELL-PALM: Kyla, then Jerry. Or sorry, Amy.  
5 I'm sorry, go ahead.

6 SECRETARY BRUCH: That's okay.

7 Logan, thanks for your work on this difficult subject  
8 matter. I like the question that was added this go around to  
9 learn about alternatives and hear from our community, and you  
10 did a good job summarizing those. I think it did push people  
11 to think of alternatives outside of biodegradable, biobased  
12 mulch. We heard, and I'd love to explore deeper, some of those  
13 challenges with the alternatives that are out there. You know,  
14 weeds in row I heard it was a big one. we can handle the weeds  
15 in the middle of the row; weeds in row are a problem. And  
16 universally, that's a challenge with anything you grow in a row  
17 in organic farming, whether you're a soybean farmer, whether  
18 you're a carrot farmer, et cetera.

19 But I actually wanted to turn it back over to you,  
20 Logan, for a little more floor time because you do currently  
21 grow in a very challenging environment, in the south, and you  
22 grow crops, fruits -- or sorry, mostly veggies, and I don't  
23 believe that you use plastic on those --

24 BD. MEM. PETREY: No.

25 SECRETARY BRUCH: -- so, I'd --

1 BD. MEM. PETREY: No, we don't

2 SECRETARY BRUCH: I'd love to hear you just briefly  
3 talk a little bit more on operations on your farm.

4 BD. MEM. PETREY: Sure. Okay, so yeah, we have a  
5 variety of vegetables. We do have kale, for example, and so --  
6 so the ones that I listed that were predominantly grown on  
7 plastic mulch we actually do not grow. We do grow watermelons  
8 in some regions, and they are on plastic mulch, but the  
9 vegetables that we grow like kales, onions, carrots, I mean,  
10 you could not grow carrot and plastic mulch. And there are  
11 other, like the herbs, they're grown some on plastic mulch,  
12 but -- but not what I would say more necessary to be on mulch.  
13 We don't grow tomatoes, and we don't grow eggplants, we don't  
14 grow those types of things that are trellised, or that have,  
15 you know, like strawberries that have fruits that are  
16 sensitive. So, yes we do grow some of the crops that some  
17 people do grow on plastic. I think that possibly the growers  
18 grow them on plastic because it's part of their rotation, and  
19 that is their -- their growing standard, and so they do grow  
20 those things on plastic to -- to match it with the other things  
21 that really do need it.

22 And then you're right, the in row weeds is a problem  
23 in every single crop. We grow corn, too, and so the way we --  
24 we do it in corn is we "throw dirt" is what we say, you know,  
25 on layby application -- or layby cultivation. We throw four,

1 five, six inches of dirt, whatever we can at the base of the  
2 plant, so we're really burying those in row weeds at the -- at  
3 the last, you know, chance that we can get in. Soil -- corn is  
4 pretty resilient and can handle that. And so same with --  
5 maybe with like soybeans, we grow at Edamame, so kind of the  
6 same thing there.

7 A lot of these veg crops can't handle -- they're --  
8 they're more sensitive, and so the -- there's a lot of root  
9 diseases. You know, there's Pythium, and there's Phytophthora,  
10 and then there's also you have Ralstonia, so there's a lot of  
11 things, soil-borne diseases that can be stimulated on those  
12 high value crops there. So, yes we grow some veg crops. We  
13 spend a -- quite a bit of money on hand-weeding. We also have  
14 the available labor because we, in the Southeast we have The  
15 H2-A program, and so we have -- we have available labor for 10  
16 months out of the year, and so we do have a significant amount.  
17 So, we have the labor for a hand-harvesting, and then they're  
18 also there to be able to weed when necessary. So, that's how  
19 we handle

20 SECRETARY BRUCH: Yeah, thank you. I appreciate  
21 that. And I -- wanted to know, I didn't see too many  
22 commenters mention this, but there's a ton of innovation. We  
23 were doing the cultivation in the past; this year we were doing  
24 a tine weeder, so instead of throwing a lot of dirt, we were  
25 doing fractional -- fractional movement of dirt, but just right



1 on top of the crop. There's propane flamers. There's lasers;  
2 we talked about that I think last time and they're pretty  
3 expensive right now, but they are actually getting deployed in  
4 organic commodity crops right now just to handle weeds because  
5 they're a challenge.

6 Two things I thought were two solves. One, the  
7 strawberry growers mention about fungicide and that the  
8 plastic -- or sorry fungus, so the plastic prevents that  
9 strawberry touching the ground and -- and interchanging with  
10 the fungus. And then the other thing that's a challenge is  
11 probably the -- the irrigation systems in some --

12 BD. MEM. PETREY: Oh, yeah.

13 SECRETARY BRUCH: -- of these areas.

14 In California where they're using just admitters and  
15 things like that, are hard to navigate with tillage so --

16 BD. MEM. PETREY: That's right, cultivation for --  
17 yeah, that's --

18 SECRETARY BRUCH: Yeah.

19 BD. MEM. PETREY: -- I've wrapped one up before.  
20 Yeah, that's not fun.

21 SECRETARY BRUCH: Yeah. So, I think there's some  
22 easy wins here with, you know, applying other techniques and  
23 then some challenges still --

24 BD. MEM. PETREY: Yeah.

25 SECRETARY BRUCH: -- to solve in these areas they're

1 using plastic, so.

2 BD. MEM. PETREY: Yeah, but the laser weeder is  
3 exciting. If it could definitely reduce costs of -- of that  
4 machine' it's about 1.5 million, so.

5 SECRETARY BRUCH: Yeah.

6 BD. MEM. PETREY: Yeah, it -- it's a lot, but it is  
7 exciting. Everything's expensive up front, so maybe that can  
8 move along.

9 And propane, we do use propane burning. You wouldn't  
10 be able to use that in plastic molds.

11 SECRETARY BRUCH: No.

12 BD. MEM. PETREY: Wouldn't recommend that for  
13 plastic, but yeah, we use -- we strictly use that, you know,  
14 right before germination to make that sterile seed bed. So, it  
15 does have its, you know, its window. It is very early and it's  
16 not in any kind of, you know, in the season, but it can -- it  
17 can significant -- you know, significantly reduce weed control  
18 if people are wanting to move away from the plastic mulch, you  
19 know, implementing that part of --

20 It's -- it's got to be a whole strategy. You know,  
21 the -- the plastic mulch is there the entire season, and so  
22 it's providing kind of a blanket weed control method, where if  
23 you're going to substitute it with other weed control methods,  
24 there's going to have to be a multiple step wise to do.

25 SECRETARY BRUCH: Um-hum. Thank you. Appreciate it.

1 CHAIR POWELL-PALM: Allison.

2 BD. MEM. JOHNSON: Thank you, Logan. That it's  
3 really helpful to hear sort of in practice what this looks  
4 like.

5 I'm sitting here wrestling with the -- kind of the  
6 true cost of food idea, and that as long as plastic mulch is  
7 available to someone, it's going to be really hard for someone  
8 else to decide to take the extra steps to build that whole  
9 integrated system that will get us away from the plastic mulch,  
10 eventually. So, I feel like we're coming up at a time where  
11 were going to have to rip off the band-aid and I hope our  
12 community is taking this discussion really seriously. I hear  
13 so much discomfort with how much plastic is in our food system,  
14 and a lot of interest in looking for solutions, and so I'm --  
15 I'm feeling like it's time for this to at least move towards  
16 coming off the list so that we have a level playing field and a  
17 really strong incentive to all put our heads together and come  
18 up with a solution.

19 BD. MEM. PETREY: Um-hum.

20 CHAIR POWELL-PALM: I'm going to go to Kyla, and then  
21 I'm going to force Jerry to be on the spot for this discussion.

22 MS. SMITH: Yes, thanks Logan for your work on this  
23 topic, and for everybody's comments.

24 My concern a little bit about what Allison had  
25 brought up and Carolyn brought up, is that, you know, plastic

1 mulch is the only place that we really see plastic on the  
2 National List, and there's plastic used all throughout the  
3 supply chain, right. And so, I -- I guess I'm just concerned  
4 that of the fairness of if we annotate then that all is falling  
5 only in one sort of sector of plastic usage. Like if we would  
6 annotate to like not -- to not have PFOS or whatever all the  
7 things, but that does not cover packaging, and drip tape, and  
8 bail wrap, and transplant containers, and all the other uses of  
9 plastic, and so it feels like we're -- or if we delist it, then  
10 again, we're delisting this one thing, but it's prevalent, and  
11 so I'm -- I don't -- I know that the community is wanting to  
12 see some solution here, and it's just going to be an  
13 interesting conversation. So, I don't know exactly how we  
14 tackle all that but it's -- there's this one listing and  
15 there's a lot of plastic that's not covered by this one  
16 listing.

17 CHAIR POWELL-PALM: I wasn't kidding, Jerry.

18 BD. MEM. D'AMORE: Are you reading my body language  
19 over here?

20 CHAIR POWELL-PALM: Well, I think you have, I think,  
21 on the record stated several times that and -- and I -- and  
22 stop me if I'm interpreting --

23 BD. MEM. D'AMORE: Do -- do me favor, add it when I  
24 don't do it, okay? Let me --

25 CHAIR POWELL-PALM: Please go ahead. Thank you.

1 BD. MEM. D'AMORE: Thank you.

2 CHAIR POWELL-PALM: Yes.

3 BD. MEM. D'AMORE: Thank you very much.

4 First of all, Logan, I -- I admire the great work. I  
5 agree with all that you've said, which already says a little  
6 bit about what I'm going to say.

7 Where I have my problem, and I thought between  
8 Allison and -- and Kyla that it would get said, you know,  
9 ripping the band-aid off and then how broad this problem is  
10 and -- and people looking to get something done, after  
11 agonizing over this for a full semester, matter of fact I've  
12 agonized over this as much as I have some of my own Sunsets, is  
13 we're not the people to do it. I'm sorry. we -- we, this  
14 organic world, is not the group that can do anything. We  
15 cannot move the needle. If we -- if we penalize our organic  
16 community by taking this away from them, I don't want to  
17 even -- even try to guess what the cost would be, but it's  
18 going to be somewhere between 300  
19 and -- and much more of a percent, but if we do that, we're  
20 going to -- and take it away from our growers, what we're going  
21 to have leftover is still 97 percent of all the plastic that  
22 goes everywhere because until we can move the conventional  
23 world, our three to 5 percent is meaningless. We will have no  
24 negotiation -- no -- no strength, no teeth vis-à-vis the  
25 manufacturer, no incentives.

1           So, yeah, I -- I and -- and the devil on this one is  
2 everything you said about the good side of plastic is  
3 absolutely true. It's marvelous stuff. Thank you.

4           CHAIR POWELL-PALM: Dilip, did you have -- do you  
5 want to go?

6           BD. MEM. PETREY: May I answer that really quickly?

7           CHAIR POWELL-PALM: Please. Absolutely.

8           BD. MEM. PETREY: Just a little comment.

9           CHAIR POWELL-PALM: Yes.

10          BD. MEM. PETREY: Not only -- okay, so yes, you're  
11 right, it's going to be very significant to the organic  
12 growers. But, also to mention that other international farmers  
13 are using this, too, and I don't understand the equivalency  
14 and -- and how that would be recognized, but more than likely  
15 were going to disadvantage, you know, the -- the domestic  
16 growers and still receive product from European growers or  
17 Canadian growers or anything, you know, of, you know, Latin  
18 American growers that are grown on plastic with this product.

19          BD. MEM. D'AMORE: Yeah.

20          BD. MEM. PETREY: And we're going to consider it  
21 organic.

22          BD. MEM. D'AMORE: Okay, permit me to follow up on  
23 that. I had the great opportunity or the luxury to visit and  
24 look at plastic mulches on farms in France, Italy, and Germany  
25 this summer and you're absolutely right, they -- they wrestle

1 with it other ways. They -- they advocate completely  
2 differently than we do, which is you got to roll it up and take  
3 it away after each crop. they -- they use it to the second and  
4 third year, which of course is -- is a lot of work, too. So,  
5 but you're right, I -- I think the -- well, I'm -- the whole  
6 world is wrestling with this product that is both evil and --  
7 and highly functional. Thank you.

8 CHAIR POWELL-PALM: Go Dilip, and then Nate.

9 BD. MEM. NANDWANI: Well, this is a comment only, not  
10 a question. Thanks, Logan, again. This is a very complex  
11 issue. one of the complex issue as a board we are, you know,  
12 struggling or juggling.

13 I also understand we have come a long way, you know,  
14 from 2001 when we had these regulations that came in Federal  
15 Register and we had no -- not many crops organic seeds were  
16 available and now in 2023, 21 years, we have almost in most of  
17 the crops organic seeds. Likewise, we have lot of other  
18 innovations, so I believe until then we have 100 percent BBDM,  
19 biobased biodegradable mulches available, or we have any other  
20 solution. Until then, I -- I think we will be still, what you  
21 know Wood said, probably live with this one. We understand the  
22 issue of the farmers problem and environmental issues, but  
23 until then.

24 Yeah, that's all I wanted to make, comment. Thank  
25 you, Nate.

1 CHAIR POWELL-PALM: Thank you. Thank you very much.  
2 Nate, please go ahead. Okay, Kim, and then Franklin.

3 BD. MEM. HUSEMAN: So, I've got two -- two things  
4 here. So, if I'm reading this correctly on the justification  
5 for the vote, removing plastic mulching covers from the  
6 National List, but also remove the prohibition of PVC-based  
7 mulch; is that --

8 BD. MEM. PETREY: That's my understanding, yes,  
9 because not in the other -- wherever it's listed in the OFPA  
10 and then 205.206, the restriction for PVC is not there, so.

11 BD. MEM. HUSEMAN: Okay. I think I saw that during  
12 Subcommittee there was four abstentions for this.

13 BD. MEM. PETREY: You should have seen it before.

14 BD. MEM. HUSEMAN: All right, so at the end of the  
15 day, let's all abstain so the --

16 BD. MEM. PETREY: (Indiscernible) the Ying and the  
17 Yang. Let's just say that's not in that category --

18 BD. MEM. HUSEMAN: So, Madam Secretary, if everyone  
19 were to abstain, what happens? I'm just curious.

20 SECRETARY BRUCH: (No audible response.)

21 BD. MEM. HUSEMAN: You know, does -- does that then  
22 reduce the two-thirds by the -- like the more people that  
23 abstain, that reduces the two-thirds clearance, right?

24 SECRETARY BRUCH: Right. I mean, in general, an  
25 abstention is somewhat equivalent to an absence.



1 BD. MEM. JOHNSON: Right.

2 SECRETARY BRUCH: Um-hum.

3 BD. MEM. HUSEMAN: Okay, so just pointing those two  
4 pieces out, I think we all struggle with this, there's the  
5 Ying, and the -- and the reduction aspect of it, so trying to  
6 find incentives. You know, this is where the community, you  
7 know, they're -- a plastic reduction pledge, I don't know  
8 similar to a carbon reduction pledge, right? Maybe they --  
9 there's a -- an offset, you know, in -- in some form that, you  
10 know, looking at the community make a, I don't know, something  
11 of that. But, you know, I think that's the challenge.

12 The state of Colorado has removed plastic bags from  
13 grocery stores. It's the new version of a dime bag, but as of  
14 January, those are actually to be completely removed, and it's  
15 75 cents to buy a reusable bag in the state of Colorado. So,  
16 you should have seen me clean out my purse before I went to  
17 Whole Foods, just down the road here, and people thought that I  
18 looked weird because I'm shoving stuff in my purse as I leave  
19 because I mean it's just -- it's a -- it's a state of mind.  
20 So, I -- I think if we reiterate it's a state of mind "what can  
21 we do" I might have not dumped the clamshell of raspberries  
22 into my purse, but I did not, you know, use a plastic bag.

23 So, I guess when I'm looking at that and thinking of  
24 offsets, I'm going to challenge our community. When we -- we  
25 aren't able to get there yet, what are our offsets and how do

1 we start tracking those offsets?

2 CHAIR POWELL-PALM: Franklin.

3 BD. MEM. QUARCOO: I do agree that the use of  
4 plastics is very important. Farmers need it. It just is not  
5 consistent with our image as stewards of the environment and  
6 all of that. So, my question is, what can be done to  
7 incentivize those conducting research so we don't keep kicking  
8 the can down the road? Because it will always -- farmers will  
9 always need something that can help suppress weeds, you know,  
10 this will not change, and it's been on the table for a while.  
11 What can we do to incentivize research, so we don't keep  
12 following the same "okay, let's talk about it some other time."

13 CHAIR POWELL-PALM: Logan, please go ahead.

14 BD. MEM. PETREY: Yeah. I think -- I think that's  
15 going to --that would be an interesting -- because there is  
16 research going on with the biodegradable mulch that, you know,  
17 done in Washington State, so -- so that is going on. But if  
18 you're going to take it for like cold -- like substituting  
19 cultivation, it almost has to be a proposed research that  
20 includes all of the functions that plastic mulch does, and then  
21 you've got to implement this IPM that does all of those things;  
22 otherwise, the grower is going to say, okay, you gave me a weed  
23 control method, but you didn't give me, you know, insect  
24 reflective barrier treatment, or whatever, or soil retention.

25 I mean there's -- there's just a lot of things, and I

1 think it would have to be something that's kind of inclusive  
2 for -- for all of them, for the grower to -- to move towards  
3 incentivize. Because at the end of the day, the grower is  
4 still going to say, well, I'm getting -- still getting more of  
5 the plastic mulch.

6 CHAIR POWELL-PALM: Do you have follow-up with that,  
7 Franklin?

8 BD. MEM. QUARCOO: So, just the biobased, what --  
9 whatever percentage we get to, I'm not saying let's not use  
10 any, but -- but even if it's biobased, does it really work for  
11 the farmers? What percentage does it get to? There has to be  
12 a direction where we see that we are weening ourselves off this  
13 product.

14 CHAIR POWELL-PALM: Um-hum.

15 BD. MEM. QUARCOO: I'm just uncomfortable with  
16 saying, oh, it's a big problem, we need it, and we just keep  
17 going.

18 BD. MEM. PETREY: You know, when we had Liz on here,  
19 she did mention that she would want to move to it, so there --  
20 there is a -- you know, the biodegradable mulch. If we can get  
21 to whatever that product is that, you know, the community  
22 agrees upon is safe, I think that there is definitely an  
23 incentive and growers want to go that route if we can ever find  
24 that material.

25 CHAIR POWELL-PALM: I would just like to note here

1 how important that small vegetable grower voice is on the  
2 Board, and not having the voice right now is really damaging,  
3 so just to make that noted for the record.

4 I think it's Brian, and then Nate, and then Wood --  
5 or no, Brian, Jerry, then Wood; am I getting that right?  
6 Sorry, folks. And Jerry, what am I getting that right? Sorry  
7 folks, I started writing it down only after like everyone's  
8 hands started going up.

9 BD. MEM. CALDWELL: Thanks. This is -- this is a  
10 great conversation. I just want to put out there that -- that  
11 personally, I -- I am definitely not in favor of -- of taking  
12 plastic mulch off the list at this point. But even though  
13 organic is a small percentage of all the plastic mulch that's  
14 used, as Jerry pointed out, I think we can lead the way here.  
15 I like what Kim said, there may be other kinds and -- and  
16 Franklin, other kinds of incentives and -- and pushes that  
17 will -- will, you know, make us go in the right direction.

18 So, just wanted to second all those -- all that  
19 thinking and -- and anybody in the in our stakeholder  
20 community, we all need, you know, all the best thoughts on this  
21 one, because it's a big one.

22 But my last -- my quick question, though, in addition  
23 to that is, where is it -- where is the requirement for  
24 removing the -- the mulch at the end of the growing season?  
25 I -- I missed that, Logan.

1 BD. MEM. PETREY: That's okay. It's under 205.206,  
2 and under OFPA.

3 SECRETARY BRUCH: Okay.

4 CHAIR POWELL-PALM: It's in the pest control section.

5 BD. MEM. CALDWELL: Oh, okay, great. Thank you.

6 BD. MEM. PETREY: Um-hum.

7 CHAIR POWELL-PALM: Nate, please go ahead.

8 BD. MEM. LEWIS: Just some ideas for consideration.  
9 One would be to evaluate the potential for kind of a hierarchy  
10 approach to weed management, so that you can use plastic mulch  
11 when mechanical cultivation is not sufficient we use that  
12 oftentimes and the stepwise approach to pest management, where  
13 you have to prevent them and then you can use natural  
14 materials, then you can use synthetic materials, so building  
15 something like that into the weed management standard might be  
16 a place to make a -- a step forward.

17 And then we see with the PVC restriction the  
18 invitation already allows for further restricting the types of  
19 materials, and so if we can get some additional information  
20 around PFOS or what, you know, whatever the -- the concern du  
21 jour is about the brief period it is in the soil and the  
22 potential for leaching, we could consider expanding that list  
23 of annotations.

24 CHAIR POWELL-PALM: Jerry, please go ahead.

25 BD. MEM. D'AMORE: Well, I can go home and have my

1 wife tell me I'm a stubborn old man, but I want to -- I want to  
2 run this by the team one more time, and maybe I can make it --  
3 cut it all short and say, I think we should go find the -- the  
4 EPA and tell them what needs to be done here. Because again,  
5 the -- the strength and the and the wherewithal to -- to move  
6 this needle is not going to come from 3 percent of the plastic  
7 on the ground. Thank you.

8 CHAIR POWELL-PALM: Wood.

9 BD. MEM. TURNER: I was just going to respond to  
10 Franklin's comment about what -- how do we incentivize this  
11 research priority?

12 Well ,it is on the list. We could take everything  
13 else off the list and let it be the only one.

14 CHAIR POWELL-PALM: Uh-huh.

15 BD. MEM. LEWIS: I mean, it's -- it's that big of a  
16 deal.

17 CHAIR POWELL-PALM: I don't hate that. Yeah.

18 BD. MEM. LEWIS: It's that big of a deal. So, I mean  
19 again, I just want to make sure, back to your point, Kim,  
20 because I was an abstention in the Subcommittee, I hate this  
21 material. I -- I hate that it's I -- I hate and don't believe  
22 that there's no recycling potential for this material, I just  
23 simply refuse to believe that, but I -- I refuse to kill  
24 organic with this vote, so.

25 AUDIENCE MEMBER: Well said.

1           CHAIR POWELL-PALM: As it settles down, I have so  
2 many things to say that I'm going to try to be very brief.  
3 In -- in kind of triangulating between Kim's point about  
4 plastics more on the consumer side, I really want to elevate  
5 what Carolyn said, that -- and I -- and I don't mean to -- to  
6 take the farmer position too hard, because I think it's  
7 important that we give due consideration, but this feels like a  
8 really cheap shot. That there is so much plastic that we  
9 farmers are always easiest to blame, and because we have very  
10 little political power, it's going to be a lot harder to tell  
11 consumers, no, you don't get your bags. Have you seen like  
12 uproars over the plastic bags around the country? If you tell  
13 farmers, who are 2 percent of the population, and then we are 1  
14 percent of that 2 percent in organic, we will never be able to  
15 effectively fight back against this. And we're, also to  
16 Jerry's point, never going to really make a dent with it's this  
17 is a virtue signal if we were to delist this material.

18           I realize and I so appreciate the passion that  
19 everyone's bringing to this. Plastics are a problem. I would  
20 elevate Mike Dill's swag game over plastic sucks, but sometimes  
21 it's necessary. And I think when we look to figuring out how  
22 do we take to a heart the value and the vision of TOPP, where  
23 we're trying to get producers to go organic, and if we say that  
24 you're going to have one very major hammer not in your toolbox  
25 if you go organic, or if you're currently organic that toolbox

1 is going to get taken away, I think we are just aiming for the  
2 wrong target. And I realize that, again, it is such a problem,  
3 but I would challenge us to look to, and I love this event  
4 every year, look to Expo West and tell me about plastic, and  
5 tell me you're going to go to each of those very innovative CPG  
6 companies, who have plastic packaging and say no more. That's  
7 a much harder lift. Been telling us farmers that you're going  
8 to take away our tools. And I don't use plastic, so I speak  
9 proverbially and as the royal "we," but it is something that I  
10 think to challenge ourselves to think that if we're going to  
11 pick a fight, pick it with a big guy. Don't just go after the  
12 farmer.

13 Any other thoughts? One question for you, Logan.

14 BD. MEM. PETREY: You finished that really well, but  
15 go ahead.

16 CHAIR POWELL-PALM: I think we hear a lot about  
17 needing to help medium and small sized farmers, and I -- I  
18 wanted to just elevate what you said a little bit with labor.  
19 But I don't know if it's business sensitive information, but  
20 could you give us a rough idea as to how many employees your  
21 operation employs?

22 BD. MEM. PETREY: Sure. So, we usually work with a  
23 weeding group at least 30 people.

24 CHAIR POWELL-PALM: Um-hum.

25 BD. MEM. PETREY: And then sometimes we can use the



1 entire crew, which can be upwards of 100.

2 CHAIR POWELL-PALM: Um-hum.

3 BD. MEM. PETREY: And you're looking at, depending on  
4 how good the cultural prices are and the weather has been, you  
5 know, good with the cultivation and whether it's been able to  
6 dry out, all of these things, the weed, seed bang, you can look  
7 to spend around \$300 an acre to even, you know, \$1500 an acre  
8 on that, and so it gets -- it gets quite costly for that.

9 And also, to mention the small growers. During the  
10 presentation -- the presentations that we saw yesterday and all  
11 the PowerPoints of the growers that were up, I think I saw  
12 plastic mulch in every single one.

13 CHAIR POWELL-PALM: Um-hum.

14 BD. MEM. PETREY: And I wanted to point it out, but I  
15 didn't want to interrupt, either.

16 CHAIR POWELL-PALM: I so appreciate that.

17 BD. MEM. PETREY: I should just have a sign that said  
18 plastic mulch, you know, and that is just to show the  
19 importance because I know labor is an issue in these small --  
20 in smaller growers that can't have the contract labor sources.  
21 And -- and weeding is -- needs to be very -- done very timely  
22 or it can be the 1500 an acre or the \$2,000 an acre. That's  
23 really how you can get it, is when you have available labor and  
24 the timing of it's correct.

25 CHAIR POWELL-PALM: Thank you for that.

1           The reason I wanted to elevate that is that we think  
2 to the resources of small farms, say the farms we saw yesterday  
3 in the TOPP presentations, they do not have 100 employees.  
4 They do not have 30 employees. They have one employee and it's  
5 usually the farmer themselves. And when we think about keeping  
6 those folks in business, I would really caution us to consider  
7 is this something -- are we -- is it -- are we having an effect  
8 or are we signaling? And if we are signaling, is the price  
9 worth putting those folks out of business?

10           Franklin?

11           BD. MEM. QUARCOO: I want to be very clear, so yes,  
12 small scale folks labor is a major issue, so I want to be on  
13 record as stating that I'm not thinking about let's take it  
14 away from them now. So, all the advantages of it, we are  
15 talking about the advantages we all know. So, I -- I'm not  
16 getting the impression that there's anybody here who doesn't  
17 see the advantages of plastic, it's just that we have to start  
18 thinking about what we want to do in the future. So, for now  
19 taking it away will be a major issue.

20           CHAIR POWELL-PALM: Yes.

21           BD. MEM. QUARCOO: But what we -- what can we do so  
22 that the process towards finding a solution, a type of plastic  
23 and no research is going on, what can we do to accelerate the  
24 process? If there is anything at all we can do I don't know,  
25 but what -- what can be done to accelerate the process?

1           CHAIR POWELL-PALM: I think that's a fantastic  
2 question. I look to recently we saw somewhere in the realm of,  
3 I think, 24 million in OREI grants distributed, and I think it  
4 would be very interesting to look at who is doing organic  
5 research, or who is interested in the organic space, and start  
6 to cultivate relationships with those folks. I would lean on  
7 Carolyn if she has any more ideas on this front. But looking  
8 at how we build those, get those folks in this room to hear  
9 these conversations and identify what it takes to make our  
10 concerns, our needs heard more directly by the folks actually  
11 doing the work. Because it seems like we put research  
12 priorities out all the time, and I'm always surprised about how  
13 few of our research priorities end up in proposals or funded  
14 proposals and -- and grant projects. So, I think -- I hear  
15 your -- your question. I think it's a I would love to see in  
16 Spring Milwaukee ideas for how we push researchers to help us  
17 out with this question.

18           Amy, please go ahead.

19           SECRETARY BRUCH: Yeah. And I think it's -- I think  
20 it's a full court premiums. I often struggle with that, too,  
21 Franklin. I -- I love solutions. I mean, challenges just make  
22 you think what -- what can we do to prevent this? I think and  
23 outreach to the private -- private sector is really important  
24 here. This impacts everybody. And as -- as Jerry mentioned,  
25 you know, it's not just our sector, it's all sectors. We -- I

1 think plastic mulch, we see that, it's very visible but plastic  
2 and is -- is in a lot of forms. And I think Nate circulated a  
3 report that was done in Europe, and -- and actually bailing  
4 twine seemed to rate way higher than plastic mulch in terms of  
5 just the -- the prolific use of plastic and -- and that hits  
6 home pretty fast in a lot of other areas. So, this is an issue  
7 I think we need all hands on deck trying to solve it and not  
8 just the organic sector, either.

9 CHAIR POWELL-PALM: In a positive light, I think we  
10 should have a contest for that CPG or that grocery store that  
11 is themselves able to eliminate plastic or celebrate the  
12 incremental march towards that elimination. Dilip?

13 BD. MEM. NANDWANI: Very quickly at what you just  
14 mentioned. So, because one of the researcher for that OREI  
15 grant was from Tennessee, my colleague, and there are a couple  
16 of other researchers I worked with them. If there is any  
17 update or recent update, you know, needed in Milwaukee, I can  
18 look into it.

19 CHAIR POWELL-PALM: Thank you. That would be  
20 wonderful to have them.

21 BD. MEM. NANDWANI: And some other updates on this  
22 issue.

23 CHAIR POWELL-PALM: Yes. And I don't want to for a  
24 second minimize that we are so grateful you are here and  
25 providing that scientist voice, so thank you.

1 BD. MEM. NANDWANI: It's great to be here. Thank  
2 you.

3 CHAIR POWELL-PALM: Carolyn, please go ahead.

4 MS. DIMITRI: I mean, I guess I'm also thinking that  
5 if we could make -- if there could be, from a social  
6 perspective. like a bigger dent at reducing plastic at the  
7 consumer level, then maybe there wouldn't -- you wouldn't feel  
8 such a pressure to do it at the farm level, as well. It's sort  
9 of like use it where it has the most benefit.

10 CHAIR POWELL-PALM: Completely agree.

11 MS. DIMITRI: Yeah.

12 CHAIR POWELL-PALM: Yes. Other comments? Questions?  
13 (No response.)

14 CHAIR POWELL-PALM: I just want to take a moment to  
15 recognize Logan's work. we've done it -- I've heard a few of  
16 you give nod to it, but a round of applause for how hard this  
17 issue is.

18 (Applause)

19 CHAIR POWELL-PALM: And Logan tirelessly asked the  
20 questions that I think is so representative of the needs of the  
21 community. Taking to heart the comments that we received that  
22 we really want to address this, but also making sure not to  
23 lose sight of those that this will affect most, so thank you  
24 for your work.

25 I turn it back to you, Madam Chair.

1           SECRETARY BRUCH: Okay, if there's no other  
2 discussion or questions, we'll move to a vote. There was a  
3 motion in Subcommittee to remove plastic mulch and covers from  
4 the National List. Motion was by Logan, seconded by Mindee.

5           CHAIR POWELL-PALM: I think we start with Kim this  
6 time.

7           BD. MEM. HUSEMAN: No.

8           CHAIR POWELL-PALM: Franklin?

9           BD. MEM. QUARCOO: No.

10          CHAIR POWELL-PALM: Wood?

11          BD. MEM. TURNER: Ugh, no.

12          CHAIR POWELL-PALM: Logan?

13          BD. MEM. PETREY: No.

14          CHAIR POWELL-PALM: Carolyn?

15          MS. DIMITRI: We're such bad people. No.

16          BD. MEM. JOHNSON: Yes.

17          CHAIR POWELL-PALM: Sorry, that was Allison as a yes.

18 Brian?

19          BD. MEM. CALDWELL: No.

20          CHAIR POWELL-PALM: Nate?

21          BD. MEM. LEWIS: No.

22          CHAIR POWELL-PALM: Dilip?

23          BD. MEM. NANDWANI: No.

24          CHAIR POWELL-PALM: Jerry?

25          BD. MEM. D'AMORE: No.

1 CHAIR POWELL-PALM: Kyla?

2 BD. MEM. SMITH: No.

3 CHAIR POWELL-PALM: Amy?

4 SECRETARY BRUCH: No.

5 BD. MEM. CALDWELL: And the Chair votes no.

6 SECRETARY BRUCH: Okay, had 1 yes, 12 no, zero  
7 abstentions, zero recusals, 2 absent. The motion fails. And  
8 there was one "Ugh" I heard from Wood.

9 CHAIR POWELL-PALM: All right. With that folks, I  
10 propose we take a break. Let's come back in 15 minutes.

11 (Whereupon, a brief recess was taken.)

12 CHAIR POWELL-PALM: Next up is going to be aqueous  
13 potassium silicate. And I'm going to go back to Madam Chair.

14 SECRETARY BRUCH: All right, welcome back. We have  
15 two listings for aqueous potassium silicate. I'll read them  
16 both into the record and then turn it over to Brian to discuss  
17 them.

18 So aqueous potassium silicate, 205.601(e)(2), as a --  
19 let's see, insecticide, and then 205.601(i), as plant disease  
20 control. Go ahead, Brian.

21 BD. MEM. CALDWELL: Thanks, Amy. Okay. Aqueous  
22 potassium silicate is an effective fungicide and miticide  
23 insecticide used by hundreds of organic farmers. Silicates are  
24 common in nature in soils and in plants. According to the  
25 technical review, very low environmental impact, nontoxic to

1 birds, fish, and honeybees. It's rated as generally regarded  
2 as safe for humans and exempt from a resident tolerance. So  
3 this stuff is a slam dunk, right?

4 Well, in these reviews, we go a little deeper than,  
5 than the EPA in their analysis and the FDA. So there are  
6 concerns about, about aqueous potassium silicate and I want to  
7 go through them. In the past, people have raised concerns  
8 about negative effects on farm workers, produce quality, and  
9 whether it's -- whether they -- it's an essential tool for the  
10 organic tool chest.

11 And we put -- we requested a new technical review  
12 last year, which I'm going to respond to those, those concerns  
13 now. Our new TR really allayed a lot of concerns, basically  
14 all the concerns that I could ferret out about the toxicity of  
15 this product, potassium silicate, to applicators. And the 2015  
16 technical review noted that there were no concerns for oral,  
17 inhalation, or dermal toxicity. Although, skin irritation  
18 could occur at higher than normal concentrations. And overall,  
19 the aggregate exposure risks were regarded as -- were rated as  
20 negligible.

21 In terms of the produce quality concerns, I talked  
22 about this at our spring meeting in some length and it's in  
23 the -- it's in the write-up and the review. But, basically,  
24 those concerns were, were based on research that wasn't really  
25 done on this kind of a product in a -- in a use as a spray.



1 They were done with, with nutrient solutions with very high  
2 silicate quantities, which then kind of deformed the plants,  
3 that sort of thing. It really wasn't appropriate. It wasn't,  
4 wasn't relevant to, to the kind of uses that we're talking  
5 about here. So in the -- so anyways in my mind that and the,  
6 the Crops Committee Subcommittee agreed with me that really  
7 answered a lot of those questions, which I'm really glad that  
8 we, we have those kinds of questions to -- that are brought up.

9 For the written comments for this meeting, three were  
10 in favor of relisting for both uses. One was for disease  
11 listing only. And one opposed both. Over 23zero listings for  
12 farmers on their organic systems plans. One noted that its use  
13 can produce incidental nanoparticles. And again in response,  
14 it turns out these are incidental nanoparticles. Nanoparticles  
15 are, are pretty common in nature and they did not cause any  
16 concerns in health and environmental testing that was reported  
17 in the -- in the two TRs.

18 So overall my sum-up and what the Crops Committee  
19 voted for was that aqueous potassium silicate presents an  
20 environmentally benign fungicide, insecticide, and miticide,  
21 which in addition can reduce some reliance on, on sulfur and  
22 copper, which is -- which is one of our goals. With that,  
23 questions?

24 CHAIR POWELL-PALM: Logan, please go ahead.

25 BD. MEM. PETREY: Maybe a question and comment. We

1 do use like Sil-MATRIX, I guess is what this product is. And  
2 so looking at it, it says it makes it more difficult to chew  
3 and digest. And I'm assuming that's because it is actually a  
4 systemic product that actually goes into the silicate would be  
5 used for the cell structure to make it stronger. Is that the  
6 mode?

7 BD. MEM. CALDWELL: So that was -- that's not on the,  
8 the Sil-MATRIX promotional material or anything, I assume. Or  
9 is it?

10 BD. MEM. PETREY: No. No, it's not.

11 BD. MEM. CALDWELL: No. It's --

12 BD. MEM. PETREY: I'm sorry. I was looking in the  
13 Sunset Review saying, yeah, forages, it can make it more  
14 difficult to digest.

15 BD. MEM. CALDWELL: Exactly.

16 BD. MEM. PETREY: And more or less it just shows that  
17 it does work, I guess. And so or at least does get into the,  
18 the cell structure to make it harder. And the idea is for the  
19 fungi will not be able to infect the cell as, as well.

20 BD. MEM. CALDWELL: The comment about sort of more  
21 difficult to digest and chew for forages, that was a study that  
22 was done with different levels of soil fertility. And, and  
23 basically lower yields in the lower fertility had higher levels  
24 of, of -- they were poor quality forage, higher levels of  
25 silicates. And that was correlated with, with poorer

1 digestion, poorer, you know, more difficulty.

2           Again, that study had nothing to do with, with the  
3 application of Sil-MATRIX or --

4           BD. MEM. PETREY: Right.

5           BD. MEM. CALDWELL: -- potassium silicate in a -- in  
6 a cropping system.

7           BD. MEM. PETREY: Got you.

8           BD. MEM. CALDWELL: So it was -- I think it was  
9 unfortunate that the TR kind of brought up some of those issues  
10 without really kind of looking more closely and is this really  
11 relevant to this -- to that review. But they did bring them  
12 up. And I went through and read the articles, and they were  
13 not really on target, in my opinion.

14           BD. MEM. PETREY: Thank you.

15           BD. MEM. CALDWELL: So, yeah. Now just to follow-up  
16 a little bit further on your question is that they -- the, the  
17 mode of action of, of potassium silicate does involve getting  
18 into the layer between the epidermis and the internal cells,  
19 and how -- and so creating some kind of a -- of a layer there.  
20 But it's really a tiny, tiny amount. It doesn't -- it's like,  
21 you know, I don't know what the number would be, but it would  
22 like a hundredth of a percent of the -- of the mass of the,  
23 like say the tomato plant or the tomato fruit, I mean.

24           So, so that is what's happening. And it definitely  
25 makes a difference to fungi and pathogens. But it doesn't --

1 there's no effect on, on the fruit quality. So --

2 BD. MEM. PETREY: Thank you.

3 CHAIR POWELL-PALM: Other questions for Brian? All  
4 right, hearing none, we'll go Madam Chair to read in the  
5 motion.

6 SECRETARY BRUCH: Okay. Thank you, Nate. Thank you,  
7 Brian, for that review. We're going to vote first on aqueous  
8 potassium silicate as an insecticide. So the motion is motion  
9 to remove aqueous potassium silicate and that's found at  
10 205.601(e)(2) from the National List. Motion by Brian,  
11 seconded by Wood.

12 CHAIR POWELL-PALM: Is it Franklin? Okay, thank you.  
13 Franklin, your vote, please?

14 BD. MEM. QUARCOO: No.

15 CHAIR POWELL-PALM: Wood?

16 BD. MEM. TURNER: No.

17 CHAIR POWELL-PALM: Logan?

18 BD. MEM. PETREY: No.

19 CHAIR POWELL-PALM: Carolyn?

20 BD. MEM. DIMITRI: No.

21 CHAIR POWELL-PALM: Allison?

22 BD. MEM. JOHNSON: No.

23 CHAIR POWELL-PALM: Brian?

24 BD. MEM. CALDWELL: No.

25 CHAIR POWELL-PALM: Nate?

1 BD. MEM. LEWIS: No.

2 CHAIR POWELL-PALM: Dilip?

3 BD. MEM. NANDWANI: No.

4 CHAIR POWELL-PALM: Jerry?

5 BD. MEM. D'AMORE: No.

6 CHAIR POWELL-PALM: Kyla?

7 BD. MEM. SMITH: No.

8 CHAIR POWELL-PALM: Amy?

9 SECRETARY BRUCH: No.

10 CHAIR POWELL-PALM: And Kim?

11 BD. MEM. HUSEMAN: No.

12 CHAIR POWELL-PALM: And the Chair votes no.

13 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
14 zero recusals, 2 absences. The motion fails.

15 Okay. Now we are going to be voting on the second  
16 listing and that's at 205.601(i)(1), motion to remove aqueous  
17 potassium silicate from the National List. It was motioned by  
18 Brian, seconded by Jerry.

19 CHAIR POWELL-PALM: With this voting, we're going to  
20 start with Wood.

21 BD. MEM. TURNER: No.

22 CHAIR POWELL-PALM: Logan?

23 BD. MEM. PETREY: No.

24 CHAIR POWELL-PALM: Carolyn?

25 BD. MEM. DIMITRI: No.

1 CHAIR POWELL-PALM: Allison?

2 BD. MEM. JOHNSON: No.

3 CHAIR POWELL-PALM: Brian?

4 BD. MEM. CALDWELL: No.

5 CHAIR POWELL-PALM: Nate?

6 BD. MEM. LEWIS: No.

7 CHAIR POWELL-PALM: Dilip?

8 BD. MEM. NANDWANI: No.

9 CHAIR POWELL-PALM: Jerry?

10 BD. MEM. D'AMORE: No.

11 CHAIR POWELL-PALM: Kyla?

12 BD. MEM. SMITH: No.

13 CHAIR POWELL-PALM: Amy?

14 SECRETARY BRUCH: No.

15 CHAIR POWELL-PALM: Kim?

16 BD. MEM. HUSEMAN: No.

17 CHAIR POWELL-PALM: Franklin?

18 BD. MEM. QUARCOO: No.

19 CHAIR POWELL-PALM: And the Chair votes no.

20 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
21 zero recusals, 2 absent. The motion fails.

22 Okay. Next on the list is elemental sulfur. So this  
23 is three listings and I'm going to present the Sunset. It's at  
24 205.601(e), as an insecticide, including acaricides or mite  
25 control; elemental sulfur at 5(i), so that's as disease

1 control; and elemental sulfur as plant or soil amendment.

2 So, I'm going to start off just highlighting the  
3 environmental issues, get into our discussion, and then work  
4 through public comments here. So environmental issues in  
5 general, elemental sulfur is relatively benign in the  
6 environment when used according to product label. Although low  
7 in acute toxicity, it still has the potential for respiratory,  
8 ocular, or dermal impacts, irritants mainly. Farm exposure can  
9 be mitigated again if label recommendation, the proper PPEs are  
10 followed.

11 The Board reviewed journal articles and a study found  
12 on the inner-webs that Oregon State University conducted about  
13 the effects on children's respiratory health. So that was  
14 something that the Subcommittee specifically reviewed.

15 And then moving onto our discussion, historically  
16 there has been strong support for the continued listing of  
17 sulfur, particularly for the use against various bacterial and  
18 fungal diseases, insects, and as soil and plant -- and as plant  
19 and soil amendments. Elemental sulfur has been included on the  
20 original National List since 1995. And that alternatives are  
21 not as effective.

22 This is something that we did discuss in Subcommittee  
23 this past season was this for a note for the inerts working  
24 group. So, in the listing at 205.601(e), the Board recommends  
25 consistency with definitions as an acaricide may not be an

1 insecticide and an insecticide may not be an acaricide. So  
2 during the review -- and thank you, Franklin, you were the one  
3 that brought that up, appreciate that. I think you'll be  
4 working on that in the inerts review. So, during the review,  
5 the NOP suggested that this could be a technical correction as  
6 part of inserts rulemaking.

7           So, we had nine commenters. They were all in  
8 support, but there were a few that had concerns. And we heard  
9 from a big cross-section of our stakeholders. For insects, a  
10 producer group stated that it's a backbone of many organic  
11 integrated pest management programs. So sulfur kills insects  
12 if they touch or eat the product.

13           As a fungicide, a producer group stated sulfur is  
14 used to control a wide range of plant diseases, including  
15 powdery mildew. And basically, it's mode of action, it just  
16 kills fungus on contact there. The way sulfur works for  
17 disease control, and this was a comment, it's not completely  
18 understood. However, the main theory is that sulfur enters the  
19 fungi cells and affects cell respiration.

20           As a soil amendment, commenters stated that soil may  
21 be deficient in sulfur for a number of reasons such as rain  
22 saturating the soil. Soils that contain lots of iron oxides  
23 and sandy soils both have tendencies towards sulfur  
24 deficiencies. And if we just think about it agronomically, we  
25 have nitrogen, that's movable; we have sulfur, that's movable;



1 and boron, that's movable. So, in our soil test, we always  
2 have to really be cognizant of those nutrients that we make  
3 sure we look at deficiencies there. And this is one, one soil  
4 amendment that right now it is not annotated that soil samples  
5 need to be provided in order to justify the use here, compared  
6 to some of the other soil amendments that we reviewed last  
7 year.

8           The concerns from our commenters really surrounded  
9 from just the way in which sulfur is derived. It can be  
10 derived through scrubbers, so derived from scrubbing, from the  
11 burning of fossil fuels. There is a concern about heavy metal  
12 contamination. Some groups called for increased worker  
13 protections due to respiratory concerns and contamination.  
14 There were other commenters that said those could be alleviated  
15 if stable recs and safety procedures were properly followed.  
16 And there was a comment and, and some consensus around the  
17 stakeholders that currently there's, there's little to no  
18 alternatives available really that are as effective as sulfur.

19           We did ask previously, and I did see some comments  
20 about this, this most recent stakeholder comment session. But  
21 we asked the question last semester about dry versus wet  
22 application. And we really learned from the community that  
23 both forms are needed for various reasons. There is just  
24 different efficacies and different timings that make those more  
25 appropriate, especially in a berry growing environment. Others

1 noted that, that were growing other crops that dry sulfur forms  
2 were, were superior.

3 So, I will turn that over to the Board chair right  
4 now.

5 CHAIR POWELL-PALM: All right. Questions for Amy?  
6 Allison, please go ahead.

7 BD. MEM. JOHNSON: Just I guess a comment and a  
8 request. The worker issues that are raised here are really  
9 worth taking quite seriously. I mean it's easy to read dermal  
10 irritant and sort of like keep going. I had the opportunity to  
11 interview a former farm worker last year, who had encountered a  
12 number of health issues on the farm including having red  
13 inflamed hands and body indefinitely. And then after she had  
14 been off the farm for a year, these symptoms cleared. And she  
15 realized it was something she had been exposed to on the farm.  
16 And when she was there, she had asked what this powdery stuff  
17 she was touching was and they told her sulfur.

18 So, this stuff is really impactful, and it's pretty  
19 well known that labels are not always followed. You can write  
20 down protocols. But when you're dealing with language barriers  
21 and potentially not providing workers with adequate protection,  
22 it's not enough. So the suggestion is to take up an annotation  
23 or, or some additional assurance to make sure that protections  
24 really are in place I think is worth some consideration by the  
25 committee.

1 CHAIR POWELL-PALM: Other thoughts or questions?

2 Brian, please go ahead.

3 BD. MEM. CALDWELL: Just to address the issue that,  
4 that often comes up in terms of the effect of, of repeated  
5 applications of sulfur on soil, in, in my own orchard over 20  
6 years, I was heavily reliant on a -- on a sulfur fungicide  
7 program. And basically, dropped the pH of the soil down to a  
8 point where a calcium deficiency in the crop and, and a  
9 condition called bitter pit, and it just was kind of spiraling  
10 out of control.

11 Now a lot of that was because I, I hadn't been  
12 testing my soil the way I should. But just shows that these  
13 sort of things can happen and that's, you know, pretty much  
14 everybody who uses it besides me should be fully aware that  
15 that issue is, is part of the whole package that you get with  
16 sulfur.

17 SECRETARY BRUCH: Yeah, that's a good point. This  
18 isn't a substance that requires a soil test to use. However,  
19 it does impact soil over time, the pH, like you mentioned.

20 BD. MEM. CALDWELL: Right. And that can be remedied  
21 also over time with, with lime, high calcium lime, gypsum,  
22 those kinds of things.

23 CHAIR POWELL-PALM: Any other questions? Comments?  
24 All right, I just real quick want to acknowledge Amy having to  
25 be both secretary, chair, and the lead on this material. So

1 thank you for the acrobatics. We do appreciate it.

2 SECRETARY BRUCH: I'm trying. Thanks for bearing  
3 with me here. Okay. So just a reminder this is a three vote  
4 substance here. So, we'll take it one at a time. First one,  
5 motion to remove elemental sulfur from the National List at  
6 205.601(e), so this is as an insecticide. Motion by Amy,  
7 seconded by Mindee. Turn it over to you.

8 CHAIR POWELL-PALM: All right. So, for the vote,  
9 we're going to start with Logan.

10 BD. MEM. PETREY: No.

11 CHAIR POWELL-PALM: Carolyn?

12 BD. MEM. DIMITRI: No.

13 CHAIR POWELL-PALM: Allison?

14 BD. MEM. JOHNSON: No.

15 CHAIR POWELL-PALM: Brian?

16 BD. MEM. CALDWELL: No.

17 CHAIR POWELL-PALM: Nate?

18 BD. MEM. LEWIS: No.

19 CHAIR POWELL-PALM: Dilip?

20 BD. MEM. NANDWANI: No.

21 CHAIR POWELL-PALM: Jerry?

22 BD. MEM. D'AMORE: No.

23 CHAIR POWELL-PALM: Kyla?

24 BD. MEM. SMITH: No.

25 CHAIR POWELL-PALM: Amy?

1 SECRETARY BRUCH: No.

2 CHAIR POWELL-PALM: Kim?

3 BD. MEM. HUSEMAN: No.

4 CHAIR POWELL-PALM: Franklin?

5 BD. MEM. QUARCOO: No.

6 CHAIR POWELL-PALM: Wood?

7 BD. MEM. TURNER: No.

8 CHAIR POWELL-PALM: And the Chair votes no.

9 SECRETARY BRUCH: Okay. That's zero yes, 13 no, zero  
10 abstentions, zero recusals, 2 absent. The motion fails.

11 Okay. Moving onto the next listing, this is motion  
12 to remove elemental sulfur from the National List at 205.601(i)  
13 as plant disease control.

14 CHAIR POWELL-PALM: We'll start with Carolyn.

15 BD. MEM. DIMITRI: No.

16 CHAIR POWELL-PALM: Allison?

17 BD. MEM. JOHNSON: No.

18 CHAIR POWELL-PALM: Brian?

19 BD. MEM. CALDWELL: No.

20 CHAIR POWELL-PALM: Nate?

21 BD. MEM. LEWIS: No.

22 CHAIR POWELL-PALM: Dilip?

23 BD. MEM. NANDWANI: No.

24 CHAIR POWELL-PALM: Jerry?

25 BD. MEM. D'AMORE: No.

1 CHAIR POWELL-PALM: Kyla?

2 BD. MEM. SMITH: No.

3 CHAIR POWELL-PALM: Amy?

4 SECRETARY BRUCH: No.

5 CHAIR POWELL-PALM: Kim?

6 BD. MEM. HUSEMAN: No.

7 CHAIR POWELL-PALM: Franklin?

8 BD. MEM. QUARCOO: No.

9 CHAIR POWELL-PALM: Wood?

10 BD. MEM. TURNER: No.

11 CHAIR POWELL-PALM: Logan?

12 BD. MEM. PETREY: No.

13 CHAIR POWELL-PALM: And the Chair votes no.

14 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
15 zero recusals, 2 absent. The motion fails.

16 And the third listing, motion to remove elemental  
17 sulfur from the National List at 205.601(j) as plant or soil  
18 amendment.

19 CHAIR POWELL-PALM: We're going to start with  
20 Allison.

21 BD. MEM. JOHNSON: No.

22 CHAIR POWELL-PALM: Brian?

23 BD. MEM. CALDWELL: No.

24 CHAIR POWELL-PALM: Nate?

25 BD. MEM. LEWIS: No.

1 CHAIR POWELL-PALM: Dilip?

2 BD. MEM. NANDWANI: No.

3 CHAIR POWELL-PALM: Jerry?

4 BD. MEM. D'AMORE: No.

5 CHAIR POWELL-PALM: Kyla?

6 BD. MEM. SMITH: No.

7 CHAIR POWELL-PALM: Amy?

8 SECRETARY BRUCH: No.

9 CHAIR POWELL-PALM: Kim?

10 BD. MEM. HUSEMAN: No.

11 CHAIR POWELL-PALM: Franklin?

12 BD. MEM. QUARCOO: No.

13 CHAIR POWELL-PALM: Wood?

14 BD. MEM. TURNER: No.

15 CHAIR POWELL-PALM: Logan?

16 BD. MEM. PETREY: No.

17 CHAIR POWELL-PALM: Carolyn?

18 BD. MEM. DIMITRI: No.

19 CHAIR POWELL-PALM: The Chair votes no.

20 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
21 zero recusals, 2 absent. The motion fails.

22 Okay. That brings us to lime sulfur. And this also  
23 is listed twice that we'll be voting on. This one is going  
24 back to Brian. So, I'll read this into the record,  
25 205.601(e)(6) lime sulfur including calcium polysulfide, and

1 205.601(i)(4), hydrated lime.

2 BD. MEM. CALDWELL: Actually, I think that one, there  
3 should be two listings for lime sulfur, yeah, one for disease  
4 and one --

5 SECRETARY BRUCH: Thank you, sorry. 205.601(i)(6),  
6 lime sulfur.

7 BD. MEM. CALDWELL: All right. Thank you, Amy. Lime  
8 sulfur, also known as calcium polysulfide, people often think  
9 of it as, as sort of similar to sulfur and the name sounds like  
10 it, but it's really its activity is really quite different.  
11 And sulfur, as I mentioned previously, is a pretty strong  
12 acidifier in the soil. Lime sulfur is a more -- much more  
13 basic material, much more alkaline material, and but used for  
14 some of the same purposes.

15 It is widely used and a very effective tool for  
16 organic farmers. It's very caustic in its concentrated form.  
17 And so applicators and mixers have to be really careful,  
18 basically just when they're -- when they're using the original  
19 concentrate before it gets diluted in the spray mix. It's  
20 pretty -- you don't want to like touch your eyes or something  
21 like that.

22 Lime sulfur can be hard on beneficials, and that's --  
23 this is one of the, the main concerns with it. But that, that  
24 issue has been well known for probably 50, 60 years at least.  
25 And the timing regimes for using lime sulfur are really well-



1 defined for -- certainly for fruit growers. I'm not as clear  
2 on how it may be used in vegetables. But, but it's very easy  
3 to time it so that you do not crash your beneficial  
4 populations. So that, that's pretty easily to deal with.

5           And one thing that's, that's remarkable about lime  
6 sulfur that, that really is different than sulfur is it has  
7 what, what growers call a kickback effect, meaning that, that  
8 an infection, a fungal infection can actually be underway for  
9 maybe up to two or three days. And so, it's the infection has  
10 already penetrated into the plant leaves, but lime sulfur will,  
11 will have a curative effect on that and kill that, that early  
12 infection, whereas most -- sulfur and most, almost all other  
13 organic fungicides have to be in place before the infection  
14 event occurs. And so, it can be a really important tool when  
15 for weather reasons or whatever, the farmer hasn't gotten out  
16 there to put the protective layer on, they can come in with  
17 lime sulfur and still control fungal diseases.

18           It's, it's relatively nonpersistent on the -- on the  
19 plants. We consider that we get five days of protection from a  
20 spray. It washes off quickly. And in terms of the, the  
21 comments that we got for this round, there were nine in favor  
22 of relisting for both uses, one for insecticide only, and one  
23 wasn't really clear about whether it was in favor or not, but  
24 it specifically required annotation about timing for, for no  
25 impact on the beneficial population. And over 280 farms listed

1 lime sulfur on their organic system plants. So, questions?

2 CHAIR POWELL-PALM: Questions from the Board? Go  
3 ahead, Nate.

4 BD. MEM. LEWIS: Just wanting to represent my  
5 stakeholders from Washington. It's an essential component of a  
6 fire blight control, a non-antibiotic fire blight control. It  
7 provides a thinning effect so that there's fewer infection  
8 sites when fire blight comes to a particular orchard. And just  
9 noting that it was cited by the Board in its decision not to  
10 renew antibiotics for tree fruit as an essential component to,  
11 to justifying that decision. So, I just wanted to provide a  
12 little context and acknowledge its importance in Washington  
13 State.

14 CHAIR POWELL-PALM: Thank you for that, yes. Other  
15 questions for Brian or comments? All right.

16 BD. MEM. CALDWELL: Yeah, just to follow-up on Nate.  
17 Lime sulfur has that effect. Sulfur does not. So that's  
18 really an important tool.

19 CHAIR POWELL-PALM: We're ready for the motion.

20 SECRETARY BRUCH: Okay. Motion to remove lime sulfur  
21 from the National List. And we are voting first for 205.601(e)  
22 as an insecticide. The motion was by Brian and seconded by  
23 Jerry.

24 CHAIR POWELL-PALM: I think Brian is going to be the  
25 first vote.

1 BD. MEM. CALDWELL: No.  
2 CHAIR POWELL-PALM: Nate?  
3 BD. MEM. LEWIS: No.  
4 CHAIR POWELL-PALM: Dilip?  
5 BD. MEM. NANDWANI: No.  
6 CHAIR POWELL-PALM: Jerry?  
7 BD. MEM. D'AMORE: No.  
8 CHAIR POWELL-PALM: Kyla?  
9 BD. MEM. SMITH: No.  
10 CHAIR POWELL-PALM: Amy?  
11 SECRETARY BRUCH: No.  
12 CHAIR POWELL-PALM: Kim?  
13 BD. MEM. HUSEMAN: No.  
14 CHAIR POWELL-PALM: Franklin?  
15 BD. MEM. QUARCOO: No.  
16 CHAIR POWELL-PALM: Wood?  
17 BD. MEM. TURNER: No.  
18 CHAIR POWELL-PALM: Logan?  
19 BD. MEM. PETREY: No.  
20 CHAIR POWELL-PALM: Carolyn?  
21 BD. MEM. DIMITRI: No.  
22 CHAIR POWELL-PALM: Allison?  
23 BD. MEM. JOHNSON: No.  
24 CHAIR POWELL-PALM: And the Chair votes no.  
25 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,

1 zero recusals, 2 absent. The motion fails.

2 Okay. We are moving onto hydrated lime.

3 CHAIR POWELL-PALM: We have to do the second vote on  
4 lime sulfur, sorry.

5 SECRETARY BRUCH: Sorry. Thank you, guys. I  
6 appreciate it. Okay. So, we're going to be voting on  
7 205.601(i) as plant disease control. So motion to remove lime  
8 sulfur from the National List, motion by Brian, seconded by  
9 Jerry.

10 CHAIR POWELL-PALM: All right. We're going to start  
11 the vote with Nate.

12 BD. MEM. LEWIS: No.

13 CHAIR POWELL-PALM: Dilip?

14 BD. MEM. NANDWANI: No.

15 CHAIR POWELL-PALM: Jerry?

16 BD. MEM. D'AMORE: No.

17 CHAIR POWELL-PALM: Kyla?

18 BD. MEM. SMITH: No.

19 CHAIR POWELL-PALM: Amy?

20 SECRETARY BRUCH: No.

21 CHAIR POWELL-PALM: Kim?

22 BD. MEM. HUSEMAN: No.

23 CHAIR POWELL-PALM: Franklin?

24 BD. MEM. QUARCOO: No.

25 CHAIR POWELL-PALM: Wood?

1 BD. MEM. TURNER: No.

2 CHAIR POWELL-PALM: Logan?

3 BD. MEM. PETREY: No.

4 CHAIR POWELL-PALM: Carolyn?

5 BD. MEM. DIMITRI: No.

6 CHAIR POWELL-PALM: And it just builds the energy for  
7 a little bit of a slight, no from the chair.

8 BD. MEM. JOHNSON: Wait, wait.

9 CHAIR POWELL-PALM: Oh, I'm sorry. Ah, I got too  
10 excited. Allison?

11 BD. MEM. JOHNSON: I know. No.

12 CHAIR POWELL-PALM: And Brian?

13 BD. MEM. CALDWELL: No.

14 CHAIR POWELL-PALM: No from the Chair.

15 SECRETARY BRUCH: Okay. Zero yes, 13 no, zero  
16 abstentions, zero recusals, 2 absent. The motion fails.

17 Now moving onto hydrated lime. And that is again  
18 going to be reviewed by Franklin. So, we'll read that into the  
19 record, 205.601(i)(4), hydrated lime. One listing. Go ahead,  
20 Franklin.

21 BD. MEM. QUARCOO: So hydrated lime is listed under  
22 205.601(i). It's a synthetic product for use in organic  
23 production for plant disease control. It is said that it may  
24 not be used to cauterize physical alterations, or deodorize  
25 animal waste that you cannot use for. And when it comes to the

1 environmental concerns, well, it's said to be practically  
2 nontoxic to and slightly toxic to fresh water fish and  
3 invertebrates when added in quantities that do not raise the pH  
4 significantly and suddenly. Additionally, when large volumes  
5 are released and they significantly increase the pH, soft  
6 bodied organisms, like some worms, it affects them, but  
7 bacteria are able to adjust to a wide range of pH changes.

8           Now when it comes to the public comments on this,  
9 there was a ranking endorsement of the product. For its use  
10 for disease control, I have one comment that said that it  
11 should be used specifically for disease control, not an -- it  
12 should be restricted to that and annotated with a specific use.  
13 So that's one of the comments on that.

14           Generally, the committee discussed the potential for  
15 environmental issues, especially in regard to that. And after  
16 a TR and everything, the committee determined that this was a  
17 product that needed to be maintained on the -- on the list.  
18 And so that's what I have.

19           CHAIR POWELL-PALM: Questions for Franklin? Kim.

20           BD. MEM. HUSEMAN: Just, just more or less pointing  
21 out that hydrated lime is another one of those materials that  
22 we see across the spectrum of Subcommittees.

23           CHAIR POWELL-PALM: Thank you for that, yes. All  
24 right, we go to the vote.

25           SECRETARY BRUCH: Motion to remove hydrated lime from

1 the National List, motion was by Mindee, seconded by Amy.

2 CHAIR POWELL-PALM: And we're going to start voting  
3 with Dilip.

4 BD. MEM. NANDWANI: No.

5 CHAIR POWELL-PALM: Jerry?

6 BD. MEM. D'AMORE: No.

7 CHAIR POWELL-PALM: Kyla?

8 BD. MEM. SMITH: No.

9 CHAIR POWELL-PALM: Amy?

10 SECRETARY BRUCH: No.

11 CHAIR POWELL-PALM: Kim?

12 BD. MEM. HUSEMAN: No.

13 CHAIR POWELL-PALM: Franklin?

14 BD. MEM. QUARCOO: No.

15 CHAIR POWELL-PALM: Wood?

16 BD. MEM. TURNER: No.

17 CHAIR POWELL-PALM: Logan?

18 BD. MEM. PETREY: No.

19 CHAIR POWELL-PALM: Carolyn?

20 BD. MEM. DIMITRI: No.

21 CHAIR POWELL-PALM: Allison?

22 BD. MEM. JOHNSON: No.

23 CHAIR POWELL-PALM: Brian?

24 BD. MEM. CALDWELL: No.

25 CHAIR POWELL-PALM: Nate?

1 BD. MEM. LEWIS: No.

2 CHAIR POWELL-PALM: And the Chair votes no.

3 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
4 zero recusals, 2 absent. The motion fails.

5 Okay. Next on the list is liquid fish products. And  
6 that's one of my Sunsets. We'll read it into the record,  
7 205.601(j)(8), liquid fish products, can be pH adjusted with  
8 sulfuric, citric, or phosphoric acid. The amount of acid used  
9 shall not exceed the minimum needed to lower the pH to 3.5.

10 And we will kind of start discussing this Sunset  
11 where we left off again in the spring. So, the NOP stated at  
12 the 2023 meeting that the recommendation regarding the  
13 annotation was currently on hold. And I start there because we  
14 did get a lot of feedback from the community on, on the  
15 annotation portion of this, this material at the October 2020  
16 meeting. And then I'm just going to state what that annotation  
17 was, so we all remember that clearly when we're discussing this  
18 going forward.

19 So, the October 2020 meeting, the Board proposed,  
20 approved, and recommended to the NOP to add an annotation to  
21 liquid fish products that, that would have limited liquid fish  
22 products to be made with fish sourced only from fish waste,  
23 bycatch, or invasive species. So, the Subcommittee did  
24 continue to discuss the importance of this annotation and  
25 reviewed the history of previous marine material boats,



1 including the fish oil annotation from handling that was the  
2 fall of 2021, and also reviewed the 2016 NOSB recommendation to  
3 add squid byproducts to the National List.

4           Since there seemed to be a precedence for the term  
5 byproduct similar to bycatch being accepted, the Subcommittee  
6 was hopeful that the liquid fish annotation from 2020 could  
7 eventually be completed. Recently, the NOSB recommendations  
8 library list saw -- noticed that the recommendation for wild  
9 native fish for liquid fish products as closed and the reason  
10 stated is technical complexity of marine environments makes  
11 rulemaking on these topics problematic. NOP does not currently  
12 plan to move forward on this item.

13           And I'm glad Jenny returned. I thought we'll just  
14 turn it over to Jenny real quick to make any additional  
15 comments from that rulemaking statement.

16           DR. TUCKER: Yeah, I touched on this a bit in the  
17 National Organic Coalition meeting earlier this week, but I  
18 want to come reshare that information here. We did -- so last  
19 we met, this was on hold. We have after every meeting, we go  
20 through the indices of recommendations and kind of do an  
21 update. That is part of our kind of institutionalized  
22 reporting now on kind of where we are. And it is important for  
23 us, I think, to, to really provide clarity even when folks  
24 don't like the answer. So, I could leave it open and, oh,  
25 yeah, maybe someday we'll work on it. But I think when it is

1 unrealistic for us to work on something, I think we want to  
2 share that information.

3           So, in this case we feel like this one, we have -- we  
4 have closed it. There were a few challenges here. Number one,  
5 marine environments are foundationally difficult for statutory  
6 reasons. We share jurisdiction -- well, anyone shares  
7 jurisdiction with NOAA, National Oceanic and Atmospheric  
8 Administration, NOAA, on anything related to, to those marine  
9 environments. So anytime we're dealing with another federal  
10 agency, that adds complexity. And so, we have chosen to engage  
11 in that complexity with groups like Customs and Border  
12 Protection with imports. But it also feeds into our decision  
13 to either prioritize or deprioritize things.

14           The second was there was not really clear consensus  
15 on this. That the recommendation passed the Board, but the  
16 public comments on this were quite mixed. And so we do tend to  
17 move forward on rulemaking on areas where there is consensus,  
18 where the community has come together, industry sectors come  
19 together on a path forward. And it was clear from the public  
20 comments that was not, not the case.

21           And then the third driver is we really all need to  
22 have in the back of our minds our certifiers, right? Our  
23 certifiers have a tremendously difficult job already. And some  
24 of the criteria that they would need to apply and evaluate, to  
25 evaluate these materials, we have a material specialist now on

1 staff who has been actually doing material audits of our  
2 certifiers. And this is a challenge for some of our  
3 certifiers.

4 So, while I, I warn you all to be thinking about them  
5 during annotations, this is another really good example where  
6 the burden on certifiers for this would have been pretty  
7 significant. So, between the statutory authority questions,  
8 burden on certifiers, the -- and just in general the workload,  
9 that we want to move ahead on things that have consensus.  
10 We've kind of completed the triple crown this morning of, of  
11 rulemaking and part of the reason we've been able to do that is  
12 we have focused more. We've said no to more things, which has  
13 allowed us to say yes to the really important things.

14 This was not ranked all that highly in the 2022  
15 regulatory priorities listing. We did that listening session  
16 where we asked for a lot of feedback on what the highest  
17 priorities were. This didn't really make the high, high list.  
18 And so, for all of those reasons, we decided to provide clarity  
19 to the community and close the item.

20 CHAIR POWELL-PALM: Allison?

21 BD. MEM. JOHNSON: Can I ask a question about that?

22 CHAIR POWELL-PALM: Sure.

23 BD. MEM. JOHNSON: I've received the explanation.

24 The piece about there not being consensus in the community  
25 gives me a lot of pause, because I don't understand what the

1 Board's rule is then. You know we tackle a lot of hard issues.  
2 And so, I think of our role as looking at the divergent  
3 opinions out there and coming to the best consensus  
4 recommendation that we can as a Board. If we weren't able to  
5 reach consensus, that would be one thing. But so, I guess my  
6 question is what is your recommendation where there are  
7 divergent opinions in the community, how can we as a Board then  
8 move forward with recommendations that will be put into action  
9 by NOP?

10 DR. TUCKER: Great question. And there's certainly  
11 times where we have moved forward with things that even though  
12 there wasn't -- we don't need complete agreement. But on this  
13 one there were, you know, significant concerns in, in the  
14 public comments. And some of the comments that I shared about  
15 our concerns on this, we actually shared during the process,  
16 right? So, this was known at the time by the Board that these  
17 were, were concerns.

18 I think one of the things you've done really  
19 successfully is when you're getting feedback from the community  
20 that is kind of controversial or shows there isn't quite yet  
21 consensus, you have been sending it back to Subcommittee and  
22 working on it. That particular item I think had already gone  
23 back and had been worked on a number of times. And I think at  
24 that time the Board said, all right, we've worked on this  
25 enough. We're going to vote on it, see if it passes, and send

1 it to NOP.

2           So, I think each, each of those items needs to be  
3 taken case by case. We do not need complete consensus or  
4 complete agreement. In fact, there are very little that there  
5 is complete consensus or complete agreement on, right? But  
6 that was a case that combined with the other factors that I  
7 mentioned kind of weighed to closing this item. The statutory  
8 authority one is a big issue. We did not finish aquaculture.  
9 And so that I think is -- marine environments are very  
10 different. And it would open up a whole new world of  
11 regulatory questions -- oh, sorry.

12           CHAIR POWELL-PALM: Of rules.

13           DR. TUCKER: Open up a whole new area of  
14 rule-oriented questions. I did catch myself.

15           BD. MEM. TURNER: Just to follow up on that last  
16 point, I totally understand that and at the same time I feel  
17 like even if the -- even if the result of, of the process would  
18 have led to say focusing specifically on invasives, let's say,  
19 I mean NIMS, U.S. Fish and Wildlife are all concerned about  
20 invasive species. So, to me it is an opportunity here for  
21 leadership from, from organic and an opportunity to create sort  
22 of a win-win with other agencies. And I just -- I totally  
23 appreciate the process. I'm not in -- I'm not in that process.  
24 But I just -- I do think when there's opportunities for us to  
25 build bridges to other -- to other agencies, other regulatory

1 bodies, I'll take the candy, I think that's, that's exciting to  
2 me on some level. And I feel like that was -- that was the  
3 opportunity here and I hate to see it, I really hate to see it  
4 dismissed like that. But appreciate it.

5 DR. TUCKER: I appreciate the comments. And  
6 actually, I fundamentally agree and there are only so many  
7 sources of excitement that we can deal with at the program at a  
8 given -- at a given time. So, I think we're certainly -- we  
9 remain aware of the importance that is held by many people on  
10 this. I think for right now, I think our closed determination  
11 is the right move. And there are times where things have been  
12 closed and then they become reopen again. And so I, I never --  
13 I want to provide clarity now, understanding that in the future  
14 maybe things open up again for different reasons, different  
15 criteria, different timing. The timing could get right.

16 CHAIR POWELL-PALM: All right. I'm going to kick it  
17 back to Amy. Thank you very much, Jenny, for fielding that  
18 question.

19 DR. TUCKER: Those are good comments and good  
20 observations, and I always appreciate the conversation.

21 SECRETARY BRUCH: Yeah, that's important to have.  
22 And especially understand a little bit more behind the, the  
23 statement for sure. So, thank you for that. I'm just going to  
24 wrap things up with this Sunset Review and then we'll open it  
25 up to more discussion. But the comment summary, there were 10

1 written comments that we received. Over half of them mentioned  
2 the necessity of the sanitations, so I wanted to spend more  
3 time on unpackaging that a little bit.

4           There were two advocacy groups that said they would  
5 not support this product if the annotation was not approved.  
6 There's a lot of usage in the community with products that are  
7 formulated with liquid fish products. One certifier mentioned  
8 over 1,100 of their members list liquid fish products on their  
9 OSP. Comments in favor, strong comments by tree growers in the  
10 northwest. Fruit and veggie growers, growers in sandy  
11 conditions, growers in tropical areas that experience a lot of  
12 rain all expressing the importance of being able to deliver  
13 nitrogen to their crops in season to correct deficiencies.

14           One farmer group mentioned when managing fertility  
15 programs, producers should emphasize soil building practices  
16 and use fish products to supplement overall fertility programs.  
17 There were additional concerns about this product, just that  
18 commenters expressed concerns that even if fish does not have a  
19 commercial value, it may have an ecological value so need to  
20 understand from a macro view what's happening in the  
21 environment.

22           Commenters also noted that the use of discarded fish  
23 parts for fertilizer may remove food from the marine ecosystem  
24 and there is a potential for contamination with PFOS. Again,  
25 we've seen that with other products that we've discussed today.

1 Let's see. There was one comment that even went further with  
2 the annotation necessity, just that we needed even more of a  
3 restricted annotation from what was originally recommended.

4 And also last semester, last season at our meeting in  
5 Atlanta, we talked about supplementation a little bit as well.  
6 We had comments last, last semester on supplementation. I  
7 didn't see any this semester. But the Board or the  
8 Subcommittee did dive into that a little bit further with OMRI.  
9 So, one commenter noted last semester that there were concerns  
10 about the potential of fortification with phosphorous and that  
11 the crop Subcommittee reviewed the landscape of the products.

12 And phosphorous is actually used from the products  
13 that are surveyed by OMRI 58 percent of the time of the 239  
14 products that are out there. So phosphoric acid is used as the  
15 stabler, versus citric acid or, or sulfuric, sulfuric acid.  
16 So, in the U.S., phosphoric acid is primarily used as the  
17 acidifier.

18 So, with that information, I will turn it back over  
19 to Nate.

20 CHAIR POWELL-PALM: All right. We're going to move  
21 to the vote, if there's no other questions or comments. Yep,  
22 seeing none, all right, read the motion.

23 SECRETARY BRUCH: Okay. Motion to remove liquid fish  
24 products from the National List. Motion was by Amy Bruch,  
25 seconded by Mindee.



1 CHAIR POWELL-PALM: And we're going to start the  
2 voting with Jerry.

3 BD. MEM. D'AMORE: No.

4 CHAIR POWELL-PALM: Kyla?

5 BD. MEM. SMITH: No.

6 CHAIR POWELL-PALM: Amy?

7 SECRETARY BRUCH: No.

8 CHAIR POWELL-PALM: Kim?

9 BD. MEM. HUSEMAN: No.

10 CHAIR POWELL-PALM: Franklin?

11 BD. MEM. QUARCOO: No.

12 CHAIR POWELL-PALM: Wood?

13 BD. MEM. TURNER: Abstain.

14 CHAIR POWELL-PALM: Logan?

15 BD. MEM. PETREY: No.

16 CHAIR POWELL-PALM: Carolyn?

17 BD. MEM. DIMITRI: No.

18 CHAIR POWELL-PALM: Allison?

19 BD. MEM. JOHNSON: Yes.

20 CHAIR POWELL-PALM: Brian?

21 BD. MEM. CALDWELL: No.

22 CHAIR POWELL-PALM: Nate?

23 BD. MEM. LEWIS: No.

24 CHAIR POWELL-PALM: Dilip?

25 BD. MEM. NANDWANI: No.

1 CHAIR POWELL-PALM: And the Chair votes no.

2 SECRETARY BRUCH: One yes, 11 no, 1 abstention, zero  
3 recusals, 2 absent. The motion fails.

4 Okay. Moving on down our Sunset Review list, we have  
5 Jerry up with sulfurous acid next. So sulfurous acid, it's at  
6 205.601(j)(11), for on-farm generation of substance utilizing  
7 99 percent purity elemental sulfur per paragraph (j)(2) of this  
8 section. Go ahead, Jerry.

9 BD. MEM. D'AMORE: Amy, thank you. The primary use  
10 of sulfurous acid is to -- is as an acidifying agent to  
11 neutralize and reduce excessive alkalinity in soil and/or  
12 water. The substance was discussed in the 2023 spring meeting  
13 in Atlanta. It was presented to the Board with a unanimous  
14 crop Subcommittee vote to remain on the National List. This  
15 2003 [sic] Sunset is reviewed -- review is supported by a  
16 February 2023 inner-scope GR, which largely focused on  
17 essentiality. For this 2023 fall session, there were about 14  
18 total stakeholder comments with nearly all being written and  
19 with nearly all in favor or in support of continued use.

20 The strongest comment against the continued use of  
21 sulfurous acid notes that its current and continued use could  
22 mask poor soil conditions and/or practices. I don't know if  
23 I'm supposed to read this or not, but I'll continue. The Crop  
24 Subcommittee finds sulfurous acid compliant with the Organic  
25 Food Production Act and is not proposing removal.

1 CHAIR POWELL-PALM: Thank you. Any discussion or  
2 questions for Jerry? Nate, please go ahead.

3 BD. MEM. LEWIS: Just want to also note for the  
4 Washington stakeholders I represent that this is a necessary  
5 material for the growth of soil-based blueberry production.  
6 And remember Washington is number one, I will point it out, so  
7 we are number one in blueberries and it's largely due to the  
8 ability to acidify irrigation water in the eastern part of the  
9 city.

10 CHAIR POWELL-PALM: Thank you.

11 BD. MEM. LEWIS: With this substance.

12 BD. MEM. D'AMORE: Thank you for that.

13 CHAIR POWELL-PALM: Amy?

14 SECRETARY BRUCH: Yeah, just more of a comment. I, I  
15 was hoping that potentially there would be alternatives for  
16 this. But then learning through the comment process, it sounds  
17 like not only is it an acidifier, pH adjuster, it also removes  
18 some impurities so that -- or reduces the amount of  
19 alternatives that are available to do a similar function. So,  
20 thank you.

21 CHAIR POWELL-PALM: All right. If no further  
22 discussion, we'll go to the motion.

23 SECRETARY BRUCH: Okay. Motion to remove sulfurous  
24 acid from the National List. Motion by Jerry, seconded by  
25 Brian.

1 CHAIR POWELL-PALM: And we're going to start with  
2 Kyla.

3 BD. MEM. SMITH: No.

4 CHAIR POWELL-PALM: Amy?

5 SECRETARY BRUCH: No.

6 CHAIR POWELL-PALM: Kim?

7 BD. MEM. HUSEMAN: No.

8 CHAIR POWELL-PALM: Franklin?

9 BD. MEM. QUARCOO: No.

10 CHAIR POWELL-PALM: Wood?

11 BD. MEM. TURNER: No.

12 CHAIR POWELL-PALM: Logan?

13 BD. MEM. PETREY: No.

14 CHAIR POWELL-PALM: Carolyn?

15 BD. MEM. DIMITRI: No.

16 CHAIR POWELL-PALM: Allison?

17 BD. MEM. JOHNSON: No.

18 CHAIR POWELL-PALM: Brian?

19 BD. MEM. CALDWELL: No.

20 CHAIR POWELL-PALM: Nate?

21 BD. MEM. LEWIS: No.

22 CHAIR POWELL-PALM: Dilip?

23 BD. MEM. NANDWANI: No.

24 CHAIR POWELL-PALM: Jerry?

25 BD. MEM. D'AMORE: No.

1 CHAIR POWELL-PALM: And the Chair votes no.

2 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
3 zero recusals, 2 absent. The motion fails.

4 Okay. Next on the list, we have ethylene gas with  
5 Logan. So, this is at 205.601(k)(1), ethylene gas for  
6 regulation of pineapple flowering. Go ahead, Logan.

7 BD. MEM. PETREY: All right, thank you. Yes, so  
8 ethylene gas, it's primary use is for to induce flowering in  
9 pineapple. And also, so ethylene gas is on the National List  
10 for as a plant growth regulator for pineapple production. We  
11 didn't hear any oral comments on, on this from any pineapple  
12 producers, but we did have some written comments. We did have  
13 a comment from Dole that did state, said we do not utilize it  
14 as a ripening agent. We use it for to induce flowering. In  
15 the past, Dole has conducted research to try to find  
16 alternatives to ethylene as a flowering inductor, but we  
17 haven't found any that could be utilized in organic production.  
18 Basically, we depend entirely on ethylene for that purpose.  
19 Not as a ripening agent, because we harvest the fruit when it  
20 is ripened naturally, not with the agent for that matter.

21 So, this product is applied -- this is a long crop,  
22 right? So not as long as a blueberry, but it, it can be  
23 applied between 7 and 15 months, and so pineapples do have very  
24 staggered flowering, which, which limits the, the ability to  
25 harvest efficiently, to harvest economically, to also apply

1 some products that would be catered towards harvesting, whether  
2 it's a certain pest, like an insecticide or something that is  
3 catered towards more of a ripened fruit. And so when you have  
4 these plants that are very staggered, that makes that type of  
5 production very difficult.

6 Looking back at the -- at the comments from 2015,  
7 when we did have pineapple growers that would show up, it was  
8 stated that the abandonment or the delisting of this material  
9 would make growers go to conventional. Also, it was noted in  
10 the comments that being able to have this product allows a lot  
11 of small growers in rural areas, and these farms in Costa Rica  
12 to be able to make -- to make a living.

13 So as far as the environmental issues from the -- we  
14 did get a TR. And so from the TR, the toxic release inventory  
15 in 2021, the total release of ethylene as airborne emissions in  
16 the U.S. was 18 million pounds. Of that, 17.2 was emitted by  
17 chemical manufacturing industry and about 0.7 million pounds  
18 was from the petroleum industry. It's not known how much  
19 ethylene is released due to ripening, but it's got to be quite  
20 small from that whole total. And so there does not seem to be  
21 an issue with that. So, trying to affect the total emissions  
22 would completely -- to wipe out that pineapple production  
23 doesn't seem to make much sense.

24 And then as far as for the human health, ethylene is  
25 highly flammable and explosive. Overexposure causes headaches,

1 drowsiness, or muscular weaknesses. High concentrations of  
2 ethylene can cause dizziness or light-headedness. This is  
3 limited to the work area of ethylene production or its use.  
4 Environmental exposure from general public, that would be too  
5 low to cause adverse effects. And that is all from the TR.

6           There were other -- let's see, a total of nine  
7 comments from the written comments. Eight were in support and  
8 one was in opposition. Another grower group did reply and said  
9 it reached out to pineapple growers through our supply chains  
10 and received numerous comments from growers in Central America.  
11 They are unanimous in stating that ethylene is necessary to the  
12 production of pineapples that they ship to the United States.  
13 This is the most important agricultural practice for organic  
14 pineapple farming. It is also accepted in other international  
15 standards.

16           And that's it. Anybody have any questions?

17           CHAIR POWELL-PALM: Questions for Logan? Jerry,  
18 please go ahead.

19           BD. MEM. D'AMORE: No question. Everything you said,  
20 I am -- is extremely accurate. It fails to say the purpose,  
21 though. I mean it says what it does, but what it -- but the  
22 end result is it's a labor-saving initiative. Right? Is  
23 that --

24           BD. MEM. PETREY: Yes. It's labor-saving, but it's  
25 and then also we could add, too, that I found in the comments

1 that it actually reduces quality issues, because it's very hard  
2 to indicate whether a pineapple is close to maturity. And so,  
3 if you can narrow down that window, it does increase the, the  
4 quality of when it's harvested. So, it's much harder -- it's  
5 much easier to tell once it's been at the grocery store, for us  
6 to tell. But it is much harder in the -- in the field.

7 BD. MEM. D'AMORE: Thank you.

8 CHAIR POWELL-PALM: Allison, then Nate.

9 BD. MEM. JOHNSON: Thank you. I see the Subcommittee  
10 vote was not unanimous. And I see one line that there was  
11 concern about using material to produce a crop during  
12 unfavorable conditions. Could you or anyone else speak to the,  
13 the non-unanimous --

14 BD. MEM. PETREY: Yeah. No, I think Mindee  
15 definitely was, was somebody who was concerned, you know,  
16 because her, in her work, she had come across some poor-quality  
17 pineapples, and it seemed to be off-season. Because it did  
18 not -- stated that it was not used for maturity reasons, it was  
19 just to kind of -- it's not used, you know, once that you have  
20 a flowering, it's not used sequentially to mature the crop.  
21 It's just to try to time that. And so, I don't know how to  
22 state whether it is out of season or not. So, no, I did not --  
23 I was not able to find that in the comments.

24 CHAIR POWELL-PALM: Nate?

25 BD. MEM. LEWIS: Just to put a finer point on the



1 labor-saving. It's a somewhat accurate characterization, but  
2 there is also a worker safety element. It's really dangerous  
3 and painful to harvest pineapples. And so, the fewer times you  
4 need to go through the field, the better it is for workers.  
5 And I recall the in-person testimony from 2015 and just how  
6 important that was stressed from folks in the field.

7           And I also recognize the OPW's, the Organic Produce  
8 Wholesalers Coalition sort of took a picture of what the  
9 pineapple leaves look like. And you can sort of see why you'd  
10 want to minimize your exposure to that working environment.

11           BD. MEM. PETREY: Very good point.

12           CHAIR POWELL-PALM: Dilip?

13           BD. MEM. NANDWANI: Very quick. Thanks, Logan. A  
14 kind of clarification. This is about inducing flowering in  
15 pineapple, not as a ripening agent. A lot of fruits in many  
16 places, especially tropical countries, they use it. So, the  
17 Subcommittee looked into this as a role as ripening?

18           BD. MEM. PETREY: Sure. So that's actually in  
19 handling. And so you'll see that tomorrow. And so, yes, there  
20 is a lot more uses. No, there's a lot more uses for this  
21 product post-harvest that we'll get into. But as far as, as a  
22 crop input during the growing season, this is the only use.  
23 And we've actually looked out, you know, asked that in the  
24 spring, are there any other uses for this material. And  
25 everything that came up for it would have been a post-harvest

1 deal. Even the preventing potatoes from sprouting would be a  
2 post-harvest issue. Anyway, thank you.

3 BD. MEM. NANDWANI: Thank you.

4 CHAIR POWELL-PALM: All right. With that we'll go to  
5 the motion, please.

6 SECRETARY BRUCH: Thank you, Logan, for that review.  
7 Motion to remove ethylene gas from the National List, motioned  
8 by Logan, seconded by Jerry.

9 CHAIR POWELL-PALM: And I think we're starting with  
10 Kim -- Amy, okay, go ahead.

11 SECRETARY BRUCH: No.

12 CHAIR POWELL-PALM: Kim?

13 BD. MEM. HUSEMAN: No.

14 CHAIR POWELL-PALM: Franklin?

15 BD. MEM. QUARCOO: No.

16 CHAIR POWELL-PALM: Wood?

17 BD. MEM. TURNER: No.

18 CHAIR POWELL-PALM: Logan?

19 BD. MEM. PETREY: No.

20 CHAIR POWELL-PALM: Carolyn?

21 BD. MEM. DIMITRI: No.

22 CHAIR POWELL-PALM: Allison?

23 BD. MEM. JOHNSON: No.

24 CHAIR POWELL-PALM: Brian?

25 BD. MEM. CALDWELL: No.

1 CHAIR POWELL-PALM: Nate?

2 BD. MEM. LEWIS: No.

3 CHAIR POWELL-PALM: Dilip?

4 BD. MEM. NANDWANI: No.

5 CHAIR POWELL-PALM: Jerry?

6 BD. MEM. D'AMORE: No.

7 CHAIR POWELL-PALM: Kyla?

8 BD. MEM. SMITH: No.

9 CHAIR POWELL-PALM: And the Chair votes no.

10 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
11 zero recusals, 2 absent. The motion fails.

12 Okay, Jerry, going back to you for microcrystalline  
13 cheese wax. It's at 205.601(o)(1) for use in log-grown  
14 mushroom production, must be made without either  
15 ethylene-propylene co-polymer or synthetic colors. Go ahead,  
16 Jerry. Thank you.

17 BD. MEM. D'AMORE: Well, thank you. I happen to like  
18 this Sunset. It's first time I can talk about being a grower  
19 without using the H word. So, I had -- I did -- I grew this  
20 for about six years in, in Virginia, and am completely  
21 comfortable with what the -- what the Sunset Review here says.

22 So, when this substance was discussed in Atlanta  
23 during the 2023 spring meeting, the bulk of the conversation  
24 centered around current need. And they referenced the concerns  
25 that the log method, which is what this is called, of shitake

1 mushroom production was no longer practiced. It was noted,  
2 however, that this method of production was still widely used  
3 by small producers.

4           During the spring 2023 session, there were about 10  
5 stakeholder comments, all of which were written. None of the  
6 comments were against the continued use of microcrystalline  
7 cheese wax. One commenter expressed support for the use until  
8 a non-petroleum base alternative becomes available. The fall  
9 stakeholder comments mirrored the spring comments almost  
10 exactly. Both sets of stakeholder comments gave support to the  
11 claim that microcrystalline cheese wax continues to be widely  
12 used by small shitake growers.

13           The crop Subcommittee finds microcrystalline cheese  
14 wax compliant with OFPA, or the Organic Food Production Act,  
15 OFPA and/or 205.601(o) and is not proposing removal.

16           CHAIR POWELL-PALM: Questions, comments for Jerry?  
17 All right, we'll go to the motion.

18           SECRETARY BRUCH: Motion to remove microcrystalline  
19 cheese wax from the National List, motion by Jerry, seconded by  
20 Brian.

21           CHAIR POWELL-PALM: All right, now we're going to  
22 start with Kim.

23           BD. MEM. HUSEMAN: No.

24           CHAIR POWELL-PALM: Franklin?

25           BD. MEM. QUARCOO: No.

1 CHAIR POWELL-PALM: Wood?

2 BD. MEM. TURNER: No.

3 CHAIR POWELL-PALM: Logan?

4 BD. MEM. PETREY: No.

5 CHAIR POWELL-PALM: Carolyn?

6 BD. MEM. DIMITRI: No.

7 CHAIR POWELL-PALM: Allison?

8 BD. MEM. JOHNSON: No.

9 CHAIR POWELL-PALM: Brian?

10 BD. MEM. CALDWELL: No.

11 CHAIR POWELL-PALM: Nate?

12 BD. MEM. LEWIS: No.

13 CHAIR POWELL-PALM: Dilip?

14 BD. MEM. NANDWANI: No.

15 CHAIR POWELL-PALM: Jerry?

16 BD. MEM. D'AMORE: No.

17 CHAIR POWELL-PALM: Kyla?

18 BD. MEM. SMITH: No.

19 CHAIR POWELL-PALM: Kim? I'm sorry. Allison? Okay,  
20 almost there folks. Amy?

21 SECRETARY BRUCH: No.

22 CHAIR POWELL-PALM: And the Chair votes no.

23 SECRETARY BRUCH: But thank you for the compliment.

24 Thank you for all those compliments.

25 CHAIR POWELL-PALM: I haven't said regulatory or

1 compliance enough, apparently.

2 SECRETARY BRUCH: Okay.

3 UNIDENTIFIED SPEAKER: I have chocolate here, anyway.

4 CHAIR POWELL-PALM: Beautiful, beautiful shot.

5 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
6 zero recusals, 2 absent. The motion fails. Thank you for your  
7 review, Jerry.

8 Okay, Wood, you're going to bring us home. We're  
9 going to switch gears, though. We're going to go to the  
10 205.602 list. So, this is non-synthetic substances prohibited  
11 for use in organic crop production, (e) potassium chloride,  
12 unless derived from a mined source and applied in a manner that  
13 minimizes chloride accumulation in the soil. Okay, Wood?

14 BD. MEM. TURNER: Yep, great. Yeah, so let's see.  
15 Potassium is an essential element for plants. Potassium  
16 chloride is a means of getting that potassium to plants, but it  
17 also can, can accumulate in the soil. And so that's, that's  
18 the point of this, where this is listed that if this is being  
19 used and is from a mined source, it has to be monitored  
20 appropriately to make sure that the soil -- doesn't affect soil  
21 salinity.

22 And so that's the primary issue here. We had good  
23 discussions about this, had a TR on this. It's actually  
24 listed, has a listing in handling, a listing in prohibition in  
25 crops. We had a good discussion about the material. I think

1 it's perceived, I think, to be a less expensive means of  
2 delivering potassium to plants, as there may be some other  
3 materials. Potassium sulfate is often mentioned, but also  
4 considered to be relatively cost-effective as well.

5 I think -- I think we continue to see strong support  
6 from the community in terms of the way this is listed. And I  
7 would say across the Board we had 11, 11 comments, written  
8 comments unanimously in support of this continued restriction  
9 on the material. That said -- well, there's a couple of things  
10 that I thought were interesting. One is that it -- one group  
11 mentioned that it is on the EPA, that it is a material that's  
12 on EPA List 4, but also on the safer list.

13 A couple of different certifiers mentioned that they  
14 have fairly significant use of this material with this  
15 restriction, you know, with the restriction in the OSP, so it  
16 is -- it is being used by some organic growers. One, one  
17 certifier actually indicated that it's actually growing in use  
18 by organic growers and so I thought that was -- that was  
19 interesting, even given the -- given the restriction.

20 Oh, I just wanted to read one, one comment that to me  
21 I thought was kind of interesting just in terms of sort of the  
22 issues here and how we -- how we think about the challenges  
23 with monitoring chloride accumulation in the soil, in  
24 particular. One group said greater industry consistency is  
25 needed regarding how certifiers determine chloride is not

1 accumulating in the soil over time. The certification  
2 currently accepts but does not require soil test to prove  
3 chloride accumulation is minimized. And they also accept OSPs  
4 that include very small amounts of potassium chloride in very  
5 infrequent applications as techniques that minimize soil  
6 accumulation.

7           And this particular group was unsure if there were  
8 other certifiers were handling material restriction in the same  
9 way. So I just think that's an interesting -- it's an  
10 interesting dimension to kind of the challenges with managing  
11 this particular listing. But in general, unanimous support to  
12 maintain this listing as it is.

13           CHAIR POWELL-PALM: Comments or questions for Wood?  
14 All right, last one.

15           SECRETARY BRUCH: Okay. Motion to remove potassium  
16 chloride from the National List, motion by Wood, seconded by  
17 Mindee.

18           CHAIR POWELL-PALM: We're going to start the voting  
19 with Franklin.

20           BD. MEM. QUARCOO: No.

21           CHAIR POWELL-PALM: Wood?

22           BD. MEM. TURNER: No.

23           CHAIR POWELL-PALM: Logan?

24           BD. MEM. PETREY: No.

25           CHAIR POWELL-PALM: Carolyn?



1 BD. MEM. DIMITRI: No.

2 CHAIR POWELL-PALM: Allison?

3 BD. MEM. JOHNSON: No.

4 CHAIR POWELL-PALM: Brian?

5 BD. MEM. CALDWELL: No.

6 CHAIR POWELL-PALM: Nate?

7 BD. MEM. LEWIS: No.

8 CHAIR POWELL-PALM: Dilip?

9 BD. MEM. NANDWANI: No.

10 CHAIR POWELL-PALM: Jerry?

11 BD. MEM. D'AMORE: No.

12 CHAIR POWELL-PALM: Kyla?

13 BD. MEM. SMITH: No.

14 CHAIR POWELL-PALM: Amy?

15 SECRETARY BRUCH: No.

16 CHAIR POWELL-PALM: Kim?

17 BD. MEM. HUSEMAN: No.

18 CHAIR POWELL-PALM: And the Chair votes no.

19 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
20 zero recusals, 2 absent. The motion fails.

21 Thanks for your review, Wood. And thank you,  
22 everybody. Thank you, thank you. That was a good thorough  
23 discussion of these materials in crops, and I really appreciate  
24 working with all of you.

25 UNIDENTIFIED SPEAKER: Thank you, Amy, for a big day.

1 You did good.

2 CHAIR POWELL-PALM: Thank you, Amy.

3 (Applause)

4 CHAIR POWELL-PALM: Well, folks, that's a wrap.

5 We're going to do this tomorrow. I'm excited to see you all

6 again. And the happy hour is going to be at 7 o'clock at the

7 Bayberry Beer Hall. Is that right, Abby? All right. So

8 looking forward to see you all there. Have a good night.

9 (Whereupon, at 5:26 p.m., the meeting was adjourned,  
10 to reconvene on Thursday, October 26, 2023.)

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CERTIFICATION

This is to certify that the attached proceeding  
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF:      FALL 2023 MEETING  
PLACE:                    Providence, Rhode Island  
DATE:                     October 25, 2023

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 *Elaine M. LaRosee* J.

\_\_\_\_\_  
Elaine M. LaRosee,  
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

FALL 2023 MEETING

Thursday,

October 26, 2023, 10:01 a.m., EST

Marriott Downtown Providence

1 Orms Street

Providence, Rhode Island 02904

National Organic Standards Board (NOSB) Members

Nate Powell-Palm, NOSB Chair

Mindee Jeffery, NOSB Vice Chair (absent)

Amy Bruch, NOSB Secretary

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

Allison Johnson

Kyla Smith

Nate Lewis

Dilip Nandwani

Logan Petrey

Franklin Quarcoo

Wood Turner

Javier Zamora (absent)

USDA/National Organic Program Staff

Dr. Jennifer Tucker, NOP Deputy Administrator

Michelle Arsenault, Advisory Committee Specialist

Jared Clark, National List Manager, Standards

Andrea Holm, Agricultural Marketing Specialist, Standards

Johanna Mirenda, Agricultural Marketing Specialist,  
Standards

Heather Kumar, NOSB Technical Support Staff

Esu Obu, NOSB Technical Support Staff

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1 PROCEEDINGS

2 (Time: 10:01 a.m.)

3 CHAIR POWELL-PALM: Good morning, everybody. We're  
4 going to be getting started here, very exciting day of handling  
5 materials to go through. So I'm glad the crowd is popping off  
6 still, lots of energy in the room. So I'm going to call my  
7 fellow board members to their seats. All right, and I'm going  
8 to hand it off right away to Kyla.

9 BOARD MEMBER SMITH: Do I get the clicker?

10 CHAIR POWELL-PALM: You get the clicker.

11 BOARD MEMBER SMITH: Okay. Welcome back, everybody.  
12 We're going to move into Handling Subcommittee. Our crowd is  
13 dwindling. Thank you for all of the audience members who are  
14 sticking with us and all those that are still on, on Zoom. We  
15 had a great team on the Handling Subcommittee this past  
16 semester. Again, we were fortunate to add Nate Lewis to our,  
17 our crew, which really will help us as we move into next year,  
18 because our workload really spikes up there. So we had to make  
19 sure we had a really deep bench so that we can -- we get  
20 through all of our work.

21 But let's not get ahead of ourselves. We have lots  
22 to talk about on our agenda today. So our work agenda this  
23 semester consisted of 19 sunsets and a few petitions. I am the  
24 lead on the two petition discussion documents that were in the  
25 packet, so let's jump right in.



1           Magnesium carbonate and magnesium carbonate hydroxide  
2 were both petitioned. I'm just going to talk a little bit  
3 about the process before we talk about the materials,  
4 themselves. These were both included as discussion documents  
5 on the agenda before the Board today because we didn't receive  
6 the TR in time to do the full review and be included on the  
7 agenda. So for this meeting, we went with discussion documents  
8 until we got the TR.

9           We, we could have waited, but we decided maybe we  
10 could try to get some information, gather some information  
11 based on questions that might better come from the community  
12 versus hearing out of the TR. That approach wasn't super  
13 effective, to be honest with you. But before I get into the  
14 public comment, let's talk about the materials, themselves.

15           So magnesium carbonate and magnesium carbonate  
16 hydroxide were both petitioned as processing aids to the  
17 National List at 205.605. I'm going to talk about them  
18 collectively because they have the same use and are used in the  
19 same way. It's my understanding that these materials are used  
20 interchangeably, not together. But since they are distinct  
21 chemical compounds, they were petitioned separately. Both  
22 materials are used as drying agents or anti-caking agents. The  
23 petitioned use was focused specifically on organic chicory  
24 production, specifically organic instant chicory powder. The  
25 petitioner stated that during the final steps of the

1 atomization and packing, that the instant chicory powder sticks  
2 to the walls of the installations and requires several stops  
3 for cleaning, which reduces the rate of production.

4           Magnesium carbonate does have a bit of history with  
5 the National List. It was previously listed on the National  
6 List at 205.605(b) with the annotation for use only in  
7 agricultural products labeled made with organic specified  
8 ingredients or food groups and prohibited in agricultural  
9 products labeled as organic. During the sunset review process  
10 in 2015, the Board voted to remove magnesium carbonate from the  
11 National List stating that, quote, "the material does not  
12 appear to be essential to organic handling," end quote.

13           Magnesium carbonate was removed from the National  
14 List effective August 7, 2017. The final rule stated, quote,  
15 "AMS received no public comments concerning the proposed  
16 removal of magnesium carbonate from the National List," end  
17 quote.

18           Additionally, in 2005, magnesium carbonate was  
19 petitioned for inclusion on the National List as a filtering  
20 aid to 205.606. The petition was rejected by the NOP because  
21 the petition was incomplete and because this substance was  
22 ineligible to be added to 205.606 because it is not  
23 agricultural.

24           As for public comments, we only received three. Most  
25 comments just stated that they needed to wait until the TR was

1 complete and reviewable to be able to provide full comments.  
2 Two comments did state -- or two commenters did state that if  
3 the petition -- or what we should stick to the petitioned use  
4 basically and annotate as such to limit the use for -- only for  
5 use in organic chicory production. One commenter stated that  
6 they did do a preliminary review. And based on that, there was  
7 no hazards that were revealed. But, again, it was preliminary  
8 and that they wanted to wait to fully evaluate the material  
9 once the TR was made public.

10 The Handling Subcommittee did receive the TR at the  
11 end of August and we deemed it sufficient, but I have not taken  
12 a deep dive into the TR yet so don't ask me too many hard  
13 questions. That's it.

14 CHAIR POWELL-PALM: Questions? Discussion for Kyla?  
15 Franklin.

16 BOARD MEMBER QUARCOO: Yes. There is a comment here  
17 or something within here about it appears silicon dioxide is  
18 currently used as an alternative. But then they -- either they  
19 use nanotechnology, which is not allowed. Do we have some kind  
20 of information on whether they use nanotechnology for the  
21 silicon dioxide?

22 BOARD MEMBER SMITH: Nanotech is prohibited. So I  
23 think we'll get -- maybe hopefully we'll get some more  
24 information about that in the TR. That was made -- a comment  
25 made by the petitioner and I don't know whether or not there is

1 merits to those claims. So hopefully we'll perhaps get some  
2 information from the TR, but nanotech is prohibited. There is  
3 a policy member in the program handbook that states as much.  
4 So --

5 CHAIR POWELL-PALM: Any other questions, comments?  
6 All right.

7 BOARD MEMBER SMITH: Okay. Moving onto sunsets, we  
8 are going to start off with calcium carbonate. Calcium  
9 carbonate is listed at 205.605(a)(6), non-synthetics allowed.  
10 And this is Kim.

11 BOARD MEMBER HUSEMAN: Thank you, Kyla. Okay, sorry,  
12 I thought we had more discussion. I was not quite prepared.  
13 Okay, here we go. So good morning. Good morning everybody in  
14 the audience. I really appreciate everybody still being here.  
15 This one is going to be very riveting.

16 So calcium carbonate. The spring comments, I'm going  
17 to refer back to the spring comments because that's where we  
18 saw the most amount of comments. But this had a very diverse  
19 background of commenters that really spoke to the vast uses for  
20 calcium carbonate in organic production, from juice production  
21 to sauces, dressings. Calcium carbonate has a wide variety of  
22 uses. One certifier mentioned that there's over 70  
23 applications for use of calcium carbonate. And overwhelmingly  
24 there was support for relisting.

25 There was a comment made about listing all -- to

1     annotate listing all of the uses eventuality. Sometimes, I  
2     think we can limit ourselves almost too much, especially with a  
3     product that can get widely used. But that being said, there  
4     seems to be a significant support for calcium carbonate to  
5     remain on the National List.

6             Any questions?

7             CHAIR POWELL-PALM: Questions for Kim? All right,  
8     we'll go to the motion.

9             BOARD MEMBER SMITH: The motion to remove calcium  
10    carbonate from the National List was made by Kim and seconded  
11    by Wood.

12            CHAIR POWELL-PALM: I am trying to remember where we  
13    ended yesterday.

14            BOARD MEMBER QUARCOO: It was me.

15            CHAIR POWELL-PALM: Was it you? Okay. So we're  
16    going to start the voting with Logan.

17            BOARD MEMBER QUARCOO: No, with me.

18            CHAIR POWELL-PALM: Oh, oh, it was Franklin was last,  
19    okay.

20            BOARD MEMBER QUARCOO: Yeah, that's right.

21            CHAIR POWELL-PALM: What did you vote, please?

22            BOARD MEMBER QUARCOO: No.

23            CHAIR POWELL-PALM: Logan?

24            BOARD MEMBER PETREY: No.

25            CHAIR POWELL-PALM: Carolyn?

1 BOARD MEMBER DIMITRI: No.

2 CHAIR POWELL-PALM: Allison?

3 BOARD MEMBER JOHNSON: No.

4 CHAIR POWELL-PALM: Brian?

5 BOARD MEMBER CALDWELL: No.

6 CHAIR POWELL-PALM: Nate?

7 BOARD MEMBER LEWIS: No.

8 CHAIR POWELL-PALM: Dilip?

9 BOARD MEMBER NANDWANI: No.

10 CHAIR POWELL-PALM: Gerry?

11 BOARD MEMBER D'AMORE: No.

12 CHAIR POWELL-PALM: Kyla?

13 BOARD MEMBER SMITH: No.

14 CHAIR POWELL-PALM: Amy?

15 SECRETARY BRUCH: No.

16 CHAIR POWELL-PALM: Kim?

17 BOARD MEMBER HUSEMAN: No.

18 CHAIR POWELL-PALM: Franklin?

19 BOARD MEMBER QUARCOO: No.

20 CHAIR POWELL-PALM: And the Chair votes no.

21 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
22 zero recusals, 2 absent. The motion fails.

23 BOARD MEMBER SMITH: Oops, wrong button. Okay.

24 Moving onto flavors. So this is at 205.605(a)(12), flavors,  
25 non-synthetic flavors may be used when organic flavors are not

1 commercially available. All flavors must be derived from  
2 organic or non-synthetic sources only and must be produced  
3 using synthetic solvents and carrier systems or any artificial  
4 preservative. And this material is Logan's.

5 BOARD MEMBER PETREY: All right, let's spice it up a  
6 bit with flavors. All right, okay. So flavors are broadly  
7 distinguished between natural and artificial, which are defined  
8 by the FDA. And commoners were concerned that the FDA  
9 definition of natural flavor includes fermentation products.  
10 Since more fermentation processes are using excluded methods,  
11 this is another potential loophole for excluded methods to make  
12 their way into organic products. That was a comment listed I  
13 think twice in the written comments.

14 But from the TR on that issue, a growing number of  
15 compounds previously derived from wild sources are being  
16 produced synthetically or through the fermentation of  
17 genetically modified organisms. The FDA has declined to  
18 address the identification and labeling of flavors obtained  
19 from genetically modified organisms. Most of the sources would  
20 be considered excluded from organic production and handling by  
21 the excluded method prohibition at 205.105(e).

22 Non-synthetic, non-agricultural ingredients may also  
23 be derived from microbial fermentation, such as yeast  
24 flavoring. As discussed below, a growing number of  
25 fermentation flavor ingredients use production methods excluded

1 from organic production and handling. Yeast and potentially  
2 other fermentation organisms can produce organically.

3 The use of these -- this material and natural flavors  
4 are widely used in organic industry for things such as baked  
5 goods, dairy products, jams, snacks, and juices. The main  
6 function is to affect flavor, not nutrition.

7 One of the commenters said that flavors added to  
8 finished organic products are generally mixtures of individual  
9 substances referred to flavor ingredients, whose primary  
10 purpose is to provide all or part of specific flavor effects to  
11 food products and to facilitate the function of the flavoring  
12 substances in the mixture. These flavor mixtures are also  
13 called compound flavors or flavor systems and are custom  
14 developed to provide a particular taste. So that means flavors  
15 can be quite complex, is what that is getting to.

16 Manufacturing. Flavors can be derived via several  
17 different methods, like cold pressing, solvent extraction,  
18 distillation, fermentation, and from many sources like wild  
19 plants and animals, botanicals, herbs, algae, fungi. Multiple  
20 commenter state in written comments manufacturers should  
21 document in their organic handling plans, progress towards  
22 wholly organic natural flavors. And can you all hear me over  
23 that? I don't have a volume on this thing.

24 Okay. Organic sources. We heard from one oral  
25 commenter stating that there has been progress in two organic



1 flavors, the ethylene acetate and the benzaldehyde. I would  
2 like to read a lengthy comment from Flavor Extract  
3 Manufacturing Association describing obstacles around sourcing  
4 organic flavors.

5           The quantity of available certified organic flavors  
6 is limited by the underdeveloped and unstable downstream raw  
7 material supply market. Until the market for organic raw  
8 material and flavor ingredients is more fully developed, flavor  
9 manufacturers will continue to struggle to obtain a consistent  
10 quantity of raw materials to produce organic certified flavors.

11           An example that was given was the grapefruit  
12 industry. Because of the greening and because of natural  
13 disasters, the organic grapefruit industry, particularly in  
14 Florida, has crashed. And so getting those materials  
15 consistently has become a problem.

16           Another comment was from a dairy products producer.  
17 That says we've been working diligently ever since annotation  
18 to pursue organic flavors whenever possible. Our processes  
19 include reaching out to flavor vendors, continuously screening  
20 new certified organic flavors for existing or new products, and  
21 we've been successful at converting about 40 percent of our  
22 flavors to organic so far. But the process is time consuming  
23 for our product research and development team. The main  
24 limitations to converting flavors are difficult to achieve the  
25 desired flavor profile and intensity, and the constraint of a

1 low flashpoint in organic flavors does make the use in  
2 pasteurized fruit and preparation very challenging.

3 And other comments or to summarize the comments,  
4 there were -- I don't think there were any opposing. There was  
5 one from a consumer that didn't make a very clear stance.  
6 However, all other comments were in support of relisting  
7 flavors and they were in support of the new annotation, and  
8 were advising the NOSB to continue the work in organic flavor  
9 sourcing.

10 Are there any questions?

11 CHAIR POWELL-PALM: Questions for Logan? Gerry?

12 BOARD MEMBER D'AMORE: Not a question. If I remember  
13 at subcommittee, it had an issue that the colors had as well,  
14 and that is that sourcing a flavor from one spot, the same  
15 flavor from another spot, sometimes they didn't mix very well.  
16 So that was one of the limiting factors, how they do or do not  
17 bundle the other.

18 BOARD MEMBER PETREY: Thank you.

19 CHAIR POWELL-PALM: Any other questions for Logan?  
20 We'll go to the motion.

21 BOARD MEMBER SMITH: The motion to remove flavors  
22 from the National List was made by Logan, seconded by Kyla  
23 Smith, myself. And --

24 CHAIR POWELL-PALM: And Logan is going to be the  
25 first to vote.

1 BOARD MEMBER PETREY: No.  
2 CHAIR POWELL-PALM: Carolyn?  
3 BOARD MEMBER DIMITRI: No.  
4 CHAIR POWELL-PALM: Allison?  
5 BOARD MEMBER JOHNSON: No.  
6 CHAIR POWELL-PALM: Brian?  
7 BOARD MEMBER CALDWELL: No.  
8 CHAIR POWELL-PALM: Nate?  
9 BOARD MEMBER LEWIS: No.  
10 CHAIR POWELL-PALM: Dilip?  
11 BOARD MEMBER NANDWANI: No.  
12 CHAIR POWELL-PALM: Gerry?  
13 BOARD MEMBER D'AMORE: No.  
14 CHAIR POWELL-PALM: Kyla?  
15 BOARD MEMBER SMITH: No.  
16 CHAIR POWELL-PALM: Amy?  
17 SECRETARY BRUCH: No.  
18 CHAIR POWELL-PALM: Kim?  
19 BOARD MEMBER HUSEMAN: No.  
20 CHAIR POWELL-PALM: Franklin?  
21 BOARD MEMBER QUARCOO: No.  
22 CHAIR POWELL-PALM: Wood?  
23 BOARD MEMBER TURNER: No.  
24 CHAIR POWELL-PALM: Logan -- oh, sorry. And the  
25 Chair votes no.

1 BOARD MEMBER PETREY: I had pregnancy brain,  
2 yesterday. That is not --

3 CHAIR POWELL-PALM: Just trying to spread it around.  
4 (Laughter.)

5 BOARD MEMBER PETREY: It is contagious, I hear. My  
6 husband said.

7 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
8 zero recusals, 2 absent. The motion fails.

9 BOARD MEMBER SMITH: Okay. We are now going into the  
10 gums. So Carolyn, bless her, took on all the gums. And so I  
11 believe she's going to talk about them all together. I'm going  
12 to read them in and then pass, pass it to, to you, Carolyn. So  
13 we have at 205.605(a)(13), gellan gum, high-acyl form only. We  
14 have at 205.605(b)(37), xanthan gum. We have at 205.606 --  
15 does that say J? I can't see -- (j), gums, water extracted  
16 only, arabic, guar, locus bean, and carob bean. And we have at  
17 205.606(r), tamarind seed gum. I think I got them all. Okay,  
18 back to -- oh, thank you. And 205.605(s), tragacanth gum.

19 Okay. Now we go backwards. Go ahead, Carolyn. I'll  
20 get there.

21 BOARD MEMBER DIMITRI: Okay, great. I feel like I  
22 really understand processed organic products now and I will  
23 never look at them the same. So we have seven gums in five  
24 different listings. And they basically serve a process of  
25 thickening and gelling or stabilizing, emulsifying, and a few

1 others. And each gum has its own special quality, so you can't  
2 swap them out one for one.

3 So, for example, gellan gum is used for thickening  
4 and gelling. Xanthan gum is an important part of gluten-free  
5 products. And guar gum is used in ice cream, yogurt, and other  
6 dairy products.

7 So the public comments were basically organized  
8 around essentiality and organic availability. And the public  
9 comments also revealed that at least from what we've received  
10 that xanthan gum is the most commonly used of all these gums.  
11 One processor said that they replaced carrageenan with gellan  
12 gum. Another processor, a dairy processor uses organic guar  
13 gum. And another organic dairy processor was able to find  
14 organic carob bean gum, but they've had some supply issues.

15 The few suggestions that we received were to break  
16 out the water extracted gums into three separate listings, to  
17 provide guidance on fermentation, from which other ingredients  
18 have reported the same guidance, and to disclose confidential  
19 business information. But overall there was support for  
20 relisting all of the gums.

21 CHAIR POWELL-PALM: Questions? Comments? Amy?

22 SECRETARY BRUCH: Carolyn, thank you for that nice  
23 review. The gellan gum in particular I thought was  
24 interesting. One stakeholder's comment that said when compared  
25 to carrageenan, gellan gum is preferred by customers. I know

1 when we reviewed carrageenan the last time, we had quite a bit  
2 of discussion on that particular substance. Does it make sense  
3 since carrageenan looks like a very complimentary substance to  
4 the gums that we try to get review of carrageenan in a similar  
5 sequence to these gums? Are there other products similar to  
6 these gums outside of carrageenan in handling when you look at  
7 alternatives?

8 BOARD MEMBER DIMITRI: I have a feeling that Kyla has  
9 a lot more knowledge on that topic than I have. I mean I guess  
10 carrageenan has its own set of issues, which we probably don't  
11 want to talk about since -- I don't know. What do you think,  
12 Kyla? I'm going to stop talking.

13 BOARD MEMBER SMITH: I mean I do think it makes sense  
14 to put carrageenan on the same cycle. I'm -- without looking,  
15 I don't -- without looking at the list, nothing is coming like  
16 to the top of my head at this moment.

17 SECRETARY BRUCH: Yeah, no problem. I just thought,  
18 I mean, we kind of step back and look at sunsets and a few  
19 other subcommittees. And sometimes, I don't know, when we're  
20 looking at alternatives and when we review these out of  
21 sequence, it's a little bit challenging that maybe we get a lot  
22 more aggregated comments that one is superior over the other  
23 and maybe we don't need all these options. I don't know. It  
24 would be interesting.

25 BOARD MEMBER SMITH: Yes. I guess I don't know how

1 we'd make that recommendation. But I'm sure it can be  
2 reorganized. I'm not sure it would change the outcome of  
3 people's stances, but it would be good to talk about them all  
4 at once.

5 CHAIR POWELL-PALM: Nate?

6 BOARD MEMBER LEWIS: I think for me on these  
7 substances it really comes down to sort of consumer preference.  
8 And from the reading I did, many of them are used to prevent  
9 chalky mouth feel in products. And that's something that  
10 consumers sometimes want to choose. But then when I look at  
11 the options that I have available to me, kind of both at my  
12 crunchy hippie store, food co-op, as well as the main grocery  
13 store, Safeway, there's a lot of options that advertise no guar  
14 gum, no carrageenan, no whatever. So those are all kind of  
15 adjacent to one another, so I feel like the necessity is there.  
16 The essentiality is there to prevent some of these features  
17 that folks are trying to avoid and that the alternatives  
18 without these products are also available in the marketplace.  
19 So I support relisting.

20 CHAIR POWELL-PALM: Amy?

21 SECRETARY BRUCH: Well, the only other comment that I  
22 -- that kind of struck me is when we look at commercial  
23 availability, when we're switching or trying to switch folks  
24 from synthetic to organic products when they are available,  
25 there was a comment made about how difficult small

1 manufacturers have of sourcing some of these organics.  
2 Sometimes, there is a minimum run quantity. So, yeah, I mean  
3 when we look at flavors or gums, I just think we need to put  
4 that in the back of our head, too, on minimum run quantities  
5 for things.

6 CHAIR POWELL-PALM: Franklin?

7 BOARD MEMBER QUARCOO: I see a fermentation step for  
8 gums and my question is, is there a possibility of excluded  
9 methods being involved.

10 BOARD MEMBER DIMITRI: I mean I think that's a  
11 concern that several commenters have raised. And I believe our  
12 initial solution to that is a modification to a document that  
13 Nate did. And maybe, Nate, you can fill us in with that  
14 information?

15 BOARD MEMBER LEWIS: Sure, yeah. This is a  
16 collaborative effort with Mindy. And I would have deferred to  
17 her as the lead on that on the Material Subcommittee. But we  
18 are looking at updating the TR template to specifically ask  
19 questions related to the use of excluded methods in  
20 fermentation products. So the way that TRs are often used by  
21 the certifier community is they, when evaluating a particular  
22 ingredient for a particular product and its compliance with  
23 organic regulations -- I'm going to be eating a lot of candy  
24 today. They, they look to those TRs as a -- as a resource for  
25 determining whether or not a particular ingredient has been



1 produced using excluded methods. And the TR doesn't explicitly  
2 ask when in the process those excluded methods may have been  
3 used. So that's what our -- we're trying to put a finer point  
4 on the questions the TRs are asking so that that resource is  
5 publicly available and certifiers can utilize it when  
6 evaluating specific ingredients for product composition  
7 approvals.

8 BOARD MEMBER PETREY: Thank you.

9 CHAIR POWELL-PALM: Other questions or comments? All  
10 right, let's go to the motion.

11 BOARD MEMBER SMITH: Okay. So we will vote on these  
12 separately. So the motion to remove gellan gum from the  
13 National List was made by Carolyn and seconded by Nate Lewis.

14 CHAIR POWELL-PALM: And we're going to start with  
15 Carolyn.

16 BOARD MEMBER DIMITRI: No. I was trying to remember  
17 what the vote was.

18 CHAIR POWELL-PALM: Allison?

19 BOARD MEMBER JOHNSON: No.

20 CHAIR POWELL-PALM: Brian?

21 BOARD MEMBER CALDWELL: No.

22 CHAIR POWELL-PALM: Nate?

23 BOARD MEMBER LEWIS: No.

24 CHAIR POWELL-PALM: Dilip?

25 BOARD MEMBER NANDWANI: No.

1 CHAIR POWELL-PALM: Gerry?

2 BOARD MEMBER D'AMORE: No.

3 CHAIR POWELL-PALM: Kyla?

4 BOARD MEMBER SMITH: No.

5 CHAIR POWELL-PALM: Amy?

6 SECRETARY BRUCH: No.

7 CHAIR POWELL-PALM: Kim?

8 BOARD MEMBER HUSEMAN: No.

9 CHAIR POWELL-PALM: Franklin?

10 BOARD MEMBER QUARCOO: No.

11 CHAIR POWELL-PALM: Wood?

12 BOARD MEMBER TURNER: No.

13 CHAIR POWELL-PALM: Logan?

14 BOARD MEMBER PETREY: No.

15 CHAIR POWELL-PALM: And the Chair votes no.

16 SECRETARY BRUCH: Zero yes -- sorry. Zero yes, 13  
17 no, zero abstentions, zero recusals, 2 absent. The motion  
18 fails.

19 BOARD MEMBER SMITH: Okay. Now we will vote on  
20 xanthan gum, the motion to remove xanthan gum from the National  
21 List was motion by Carolyn, seconded by Kim.

22 CHAIR POWELL-PALM: We'll start with Allison.

23 BOARD MEMBER JOHNSON: No.

24 CHAIR POWELL-PALM: Brian?

25 BOARD MEMBER CALDWELL: No.

1 CHAIR POWELL-PALM: Nate?

2 BOARD MEMBER LEWIS: No.

3 CHAIR POWELL-PALM: Dilip?

4 BOARD MEMBER NANDWANI: No.

5 CHAIR POWELL-PALM: Gerry?

6 BOARD MEMBER D'AMORE: No.

7 CHAIR POWELL-PALM: Kyla?

8 BOARD MEMBER SMITH: No.

9 CHAIR POWELL-PALM: Amy?

10 SECRETARY BRUCH: No.

11 CHAIR POWELL-PALM: Kim?

12 BOARD MEMBER HUSEMAN: No.

13 CHAIR POWELL-PALM: Franklin?

14 BOARD MEMBER QUARCOO: No.

15 CHAIR POWELL-PALM: Wood?

16 BOARD MEMBER TURNER: No.

17 CHAIR POWELL-PALM: Logan?

18 BOARD MEMBER PETREY: No.

19 CHAIR POWELL-PALM: Carolyn?

20 BOARD MEMBER DIMITRI: No.

21 CHAIR POWELL-PALM: And the Chair votes no.

22 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
23 zero recusals, 2 absent. The motion fails.

24 BOARD MEMBER SMITH: Okay. The motion to remove  
25 gums, water extracted only, arabic, guar, locus bean, and carob

1 bean, from the National List was made by Carolyn and seconded  
2 by Gerry.

3 CHAIR POWELL-PALM: We'll start with Brian.

4 BOARD MEMBER CALDWELL: No.

5 CHAIR POWELL-PALM: Nate?

6 BOARD MEMBER LEWIS: No.

7 CHAIR POWELL-PALM: Dilip?

8 BOARD MEMBER NANDWANI: No.

9 CHAIR POWELL-PALM: Gerry?

10 BOARD MEMBER D'AMORE: No.

11 CHAIR POWELL-PALM: Kyla?

12 BOARD MEMBER SMITH: No.

13 CHAIR POWELL-PALM: Amy?

14 SECRETARY BRUCH: No.

15 CHAIR POWELL-PALM: Kim?

16 BOARD MEMBER HUSEMAN: No.

17 CHAIR POWELL-PALM: Franklin?

18 BOARD MEMBER QUARCOO: No.

19 CHAIR POWELL-PALM: Wood?

20 BOARD MEMBER TURNER: No.

21 CHAIR POWELL-PALM: Logan?

22 BOARD MEMBER PETREY: No.

23 CHAIR POWELL-PALM: Carolyn?

24 BOARD MEMBER DIMITRI: No.

25 CHAIR POWELL-PALM: Allison?

1 BOARD MEMBER JOHNSON: No.

2 CHAIR POWELL-PALM: And the Chair votes no.

3 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
4 zero recusals, 2 absent. The motion fails.

5 BOARD MEMBER SMITH: The motion to remove tamarind  
6 seed gum from the National List was made by Carolyn, seconded  
7 by Allison.

8 CHAIR POWELL-PALM: Let's start with Nate.

9 BOARD MEMBER LEWIS: No.

10 CHAIR POWELL-PALM: Dilip?

11 BOARD MEMBER NANDWANI: No.

12 CHAIR POWELL-PALM: Gerry?

13 BOARD MEMBER D'AMORE: No.

14 CHAIR POWELL-PALM: Kyla?

15 BOARD MEMBER SMITH: No.

16 CHAIR POWELL-PALM: Amy?

17 SECRETARY BRUCH: No.

18 CHAIR POWELL-PALM: Kim?

19 BOARD MEMBER HUSEMAN: No.

20 CHAIR POWELL-PALM: Franklin?

21 BOARD MEMBER QUARCOO: No.

22 CHAIR POWELL-PALM: Wood?

23 BOARD MEMBER TURNER: No.

24 CHAIR POWELL-PALM: Logan?

25 BOARD MEMBER PETREY: No.

1 CHAIR POWELL-PALM: Carolyn?

2 BOARD MEMBER DIMITRI: No.

3 CHAIR POWELL-PALM: Allison?

4 BOARD MEMBER JOHNSON: No.

5 CHAIR POWELL-PALM: Brian?

6 BOARD MEMBER CALDWELL: No.

7 CHAIR POWELL-PALM: And the Chair votes no.

8 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
9 zero recusals, 2 absent. The motion fails.

10 BOARD MEMBER SMITH: The motion to remove tragacanth  
11 gum from the National List was made by Carolyn, seconded by  
12 Kyla, myself.

13 CHAIR POWELL-PALM: Let's start the voting with  
14 Dilip.

15 BOARD MEMBER NANDWANI: No.

16 CHAIR POWELL-PALM: Gerry?

17 BOARD MEMBER D'AMORE: No.

18 CHAIR POWELL-PALM: Kyla?

19 BOARD MEMBER SMITH: No.

20 CHAIR POWELL-PALM: Amy?

21 SECRETARY BRUCH: No.

22 CHAIR POWELL-PALM: Kim?

23 BOARD MEMBER HUSEMAN: No.

24 CHAIR POWELL-PALM: Franklin?

25 BOARD MEMBER QUARCOO: No.

1 CHAIR POWELL-PALM: Wood?

2 BOARD MEMBER TURNER: No.

3 CHAIR POWELL-PALM: Logan?

4 BOARD MEMBER PETREY: No.

5 CHAIR POWELL-PALM: Carolyn?

6 BOARD MEMBER DIMITRI: No.

7 CHAIR POWELL-PALM: Allison?

8 BOARD MEMBER JOHNSON: No.

9 CHAIR POWELL-PALM: Brian?

10 BOARD MEMBER CALDWELL: No.

11 CHAIR POWELL-PALM: Nate?

12 BOARD MEMBER LEWIS: No.

13 CHAIR POWELL-PALM: And the Chair votes no.

14 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
15 zero recusals, 2 absent. The motion fails. It's like speed  
16 voting.

17 BOARD MEMBER SMITH: Okay. We will move onto oxygen.  
18 Oxygen is 205.605(a)(21), oxygen oil-free grades. And this is  
19 Wood.

20 BOARD MEMBER TURNER: Shout out to oxygen. I hope  
21 everybody gets outside and enjoys a walk today. This is a  
22 substance that we all know and love. It's used in modified  
23 atmosphere packaging. It is odorless and tasteless -- what's  
24 wrong? You can't hear me? Okay, sorry. Thank you. It helps  
25 to prevent spoilage in products, has been unanimously relisted

1 in the past. Discussion was very limited at the last meeting.  
2 We heard from five commenters. Everyone either supports it or  
3 has no concerns from their members. I think that's it.

4 CHAIR POWELL-PALM: Questions for Wood on oxygen?  
5 Hearing none, let's please read the motion.

6 BOARD MEMBER SMITH: The motion to remove oxygen from  
7 the National List was made by Wood, seconded by Kyla, myself.

8 CHAIR POWELL-PALM: And we'll go to the votes  
9 starting with Gerry.

10 BOARD MEMBER D'AMORE: No.

11 CHAIR POWELL-PALM: Kyla?

12 BOARD MEMBER SMITH: No.

13 CHAIR POWELL-PALM: Amy?

14 SECRETARY BRUCH: No.

15 CHAIR POWELL-PALM: Kim?

16 BOARD MEMBER HUSEMAN: No.

17 CHAIR POWELL-PALM: Franklin?

18 BOARD MEMBER QUARCOO: No.

19 CHAIR POWELL-PALM: Wood?

20 BOARD MEMBER TURNER: No.

21 CHAIR POWELL-PALM: Logan?

22 BOARD MEMBER PETREY: No.

23 CHAIR POWELL-PALM: Carolyn?

24 BOARD MEMBER DIMITRI: No.

25 CHAIR POWELL-PALM: Allison?



1 BOARD MEMBER JOHNSON: No.

2 CHAIR POWELL-PALM: Brian?

3 BOARD MEMBER CALDWELL: No.

4 CHAIR POWELL-PALM: Nate?

5 BOARD MEMBER LEWIS: No.

6 CHAIR POWELL-PALM: Dilip?

7 BOARD MEMBER NANDWANI: No.

8 CHAIR POWELL-PALM: And the Chair votes no.

9 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
10 zero recusals, 2 absent. The motion fails.

11 BOARD MEMBER SMITH: The next material is potassium  
12 chloride. Potassium chloride is 205.605(a)(23), potassium  
13 chloride. This is also Wood.

14 BOARD MEMBER TURNER: Reminder that potassium  
15 chloride was something we voted on yesterday, prohibited in  
16 crops. But listed -- allowed in handling and generally enjoys  
17 strong support from commenters. We had a group of seven  
18 commenters, all of whom supported continued listing or talked  
19 about the use of the material in OSPs. Some discussion we've  
20 had historically about use annotations potentially, but  
21 generally support.

22 It's a substance that is a flavor enhancer, flavoring  
23 agent, helps provide a salty flavor in products. Supports  
24 taste, texture, and shelf-life in food products. Has been  
25 unanimously supported for relisting in the past. And

1 discussion has been similar to that by this Board. Again,  
2 strong support from the community.

3 CHAIR POWELL-PALM: Questions for Wood? All right,  
4 we'll go to the motion.

5 BOARD MEMBER SMITH: The motion to remove potassium  
6 chloride from the National List was made by Wood and seconded  
7 by Nate Lewis.

8 CHAIR POWELL-PALM: We'll start the vote with you,  
9 Kyla.

10 BOARD MEMBER SMITH: No.

11 CHAIR POWELL-PALM: Amy?

12 SECRETARY BRUCH: No.

13 CHAIR POWELL-PALM: Kim?

14 BOARD MEMBER HUSEMAN: No.

15 CHAIR POWELL-PALM: Franklin?

16 BOARD MEMBER QUARCOO: No.

17 CHAIR POWELL-PALM: Wood?

18 BOARD MEMBER TURNER: No.

19 CHAIR POWELL-PALM: Logan?

20 BOARD MEMBER PETREY: No.

21 CHAIR POWELL-PALM: Carolyn?

22 BOARD MEMBER DIMITRI: No.

23 CHAIR POWELL-PALM: Allison?

24 BOARD MEMBER JOHNSON: No.

25 CHAIR POWELL-PALM: Brian?

1 BOARD MEMBER CALDWELL: No.

2 CHAIR POWELL-PALM: Nate?

3 BOARD MEMBER LEWIS: No.

4 CHAIR POWELL-PALM: Dilip?

5 BOARD MEMBER NANDWANI: No.

6 CHAIR POWELL-PALM: And Gerry?

7 BOARD MEMBER D'AMORE: No.

8 CHAIR POWELL-PALM: And the Chair votes no.

9 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
10 zero recusals, 2 absent. The motion fails.

11 BOARD MEMBER SMITH: Now we will go to alginates.  
12 Alginates are listed at 205.605(b)(3), alginates. And this is  
13 Dilip's material.

14 BOARD MEMBER NANDWANI: Thanks, Kyla. Good morning,  
15 again. Still pretty straight-forward. So alginates are used  
16 in food production and handling, and an emulsifier, or  
17 emulsifier salt, firming agent, flavor enhancer or flavor  
18 adjuvant, formulation aid, processing aid, stabilizer or  
19 thickener. The use of alginates is also known in industrial  
20 applications and the medical field.

21 They are produced from algin and are usually  
22 extracted from the sand bars of brown algae. Commercial  
23 alginates are isolated mainly from the algin species, namely  
24 laminaria hyperborea, laminaria digitata, laminaria japonica,  
25 as for file and species, and there are a few other species.

1 They are listed in the document.

2 Seaweed cultivation is largely considered to be an  
3 environmentally friendly form of agriculture. And we are not  
4 aware of any evidence that the harvesting practices for brown  
5 seaweed are damaging to local ecosystems.

6 Previous sunset review demonstrated a continued need  
7 for this material. And public comments from the spring 2023  
8 meeting support relisting of alginates at 205.605(b).

9 From the comment docket, I'm going to read this one  
10 comment, quote, "Alginates are a versatile ingredient that  
11 provide unique stabilizing properties. In response to Handling  
12 Subcommittee questions, the International Food Additives  
13 Council, IFAC, expects that there will be increased organic  
14 community interest in sodium alginate in particular based on  
15 its use in meat alternative products," end quote.

16 So the question we asked the stakeholders was what  
17 forms of alginate are currently being used in organic  
18 production. And we got public comments illustrating that given  
19 the growing interest in plant-based meat alternatives, sodium  
20 alginate would be of particular interest of relisting. The  
21 subcommittee discussion centered on the current forms of  
22 alginates that are being used in organic production. Thank  
23 you.

24 CHAIR POWELL-PALM: Thank you. Questions for Dilip?  
25 Amy?

1           SECRETARY BRUCH: Dilip, I just have a general  
2 question. You mentioned the public comment. That was really  
3 interesting. Can you comment how bit the organic nonmeat space  
4 is, alternative meat products? I'm just not familiar with that  
5 being in Nebraska. Thank you.

6           BOARD MEMBER NANDWANI: Kyla also maybe can add, but  
7 what my understanding is that I think there is a growing  
8 interest in plant-based meat alternatives. That's my  
9 understanding. And since I am this area, I have seen some  
10 products in the grocery stores, as well. This is just my  
11 personal observation.

12           SECRETARY BRUCH: Yeah, I'm familiar the space is  
13 growing, but I didn't know an organic sector of that space, the  
14 processing and all the additives. I was just curious, because  
15 I saw on some other public comments they said, well, we don't  
16 need this now, but we're going to be innovating in the future.  
17 So I was just trying to understand is that where the innovation  
18 is coming from, in the organic alternative meat space.

19           BOARD MEMBER NANDWANI: That's my understanding is  
20 that, yes. That's a good question. Kyla, I think you want to  
21 add something?

22           BOARD MEMBER SMITH: I think what you just said is  
23 accurate. Just, yes, I don't -- I don't think -- I don't think  
24 PCO certified any like plant-based meat alternatives currently.  
25 And I do think that you're right that like some of the

1 ingredients are not compatible with organic production. But  
2 that is an opportunity for development.

3 BOARD MEMBER NANDWANI: Correct.

4 SECRETARY BRUCH: Okay. That's how I kind of  
5 understood. If you give us this, maybe the production will  
6 come or something like that. Because it's not like there was  
7 more innovation. It didn't seem like there was anybody  
8 necessarily using this, at this time --

9 BOARD MEMBER NANDWANI: Right. I think it's still in  
10 infancy.

11 SECRETARY BRUCH: -- from the public comments that I  
12 read.

13 BOARD MEMBER NANDWANI: Yeah.

14 CHAIR POWELL-PALM: Allison?

15 BOARD MEMBER JOHNSON: Yeah, thank you. I mean this  
16 is a pet project dream of mine, so organic transportation burger,  
17 one of these days.

18 SECRETARY BRUCH: And I just wanted to draw attention  
19 to one of the comments that asked us to look at the alginates  
20 at a more granular level so we could look at production areas  
21 and the environmental impact. I don't think we can do that  
22 through the sunset process. But as we're continuing to keep a  
23 list of annotations, we may want to look at like tweaks that  
24 could be made to the list. This is one that we should  
25 consider.

1 CHAIR POWELL-PALM: Gerry?

2 BOARD MEMBER D'AMORE: I just want to make a comment,  
3 but I think we're all clear there is an aspirational piece of  
4 this, which we just discussed. But it is -- it is used in the  
5 handling sphere, emulsifier, firming agent, flavor enhancer,  
6 etc. Thank you.

7 CHAIR POWELL-PALM: Franklin?

8 BOARD MEMBER QUARCOO: Yes. This is a follow-up to a  
9 question I asked you in the spring about seaweed being used for  
10 bioremediation. And then being used for the extraction of  
11 alginates. And I see here that there is a statement to the  
12 effect that it was determined that there are likely -- the ones  
13 that I used for the alginate extraction are likely from  
14 different sources. Am I to understand that this seaweed is  
15 seaweed. Wherever you find it, if it does bioremediation  
16 that's what it does. It goes fully in the soil, also. In the  
17 water, it will take it up.

18 So am I to understand that this particular seaweed  
19 that is being used for alginate is being grown somewhere where  
20 they can ensure that there is nothing in there? Because if the  
21 statement is that it goes through a purification process so we  
22 assure there is nothing in it, I understand. But if it's grown  
23 from a different source, pollution is all over the place. The  
24 world is an equal opportunity. We are polluting every place.  
25 It's not like some places are better than others. But I'm just

1 -- I just want to be sure where this being grown that makes  
2 them free of some of the thing that bio-remediating plants take  
3 from the water.

4 CHAIR POWELL-PALM: Gerry?

5 BOARD MEMBER D'AMORE: I can't answer that question.  
6 But I can say that the algae, themselves, is a purifier. So  
7 it's job or part of it's job is to take impurities out of the  
8 water. So I think the question is a strong question.

9 CHAIR POWELL-PALM: Nate?

10 BOARD MEMBER LEWIS: To your question, Franklin, the  
11 TR does -- to quote from the TR, it says commercial  
12 manufacturing of alginate almost always involves a purification  
13 step wherein acid treatment precipitates the alginate as  
14 alginic acid. It also mentions regular use of an ion exchange  
15 column for purification. So whether or not that removes  
16 potential contaminants or not, I think we may be able to infer  
17 that. But your comment was taken to heart in my review of  
18 this. And those steps alleviated some of those concerns for  
19 me.

20 BOARD MEMBER QUARCOO: Thank you.

21 CHAIR POWELL-PALM: Other questions for Dilip?  
22 Kayla?

23 BOARD MEMBER SMITH: First, just a clarification,  
24 because I just noticed this typo myself and then Carolyn also  
25 noticed it. There was a typo where it says the alginates were



1 added to the National List in 2022. And that's not correct.

2 CHAIR POWELL-PALM: Good catch.

3 BOARD MEMBER SMITH: I think it should have been  
4 2002. I think it's been listed since the original Final Rule  
5 was published. My question though is, Dilip, you -- and I saw  
6 this in the comments, as well, and you specifically noted that  
7 comments were received particularly on sodium alginate as a  
8 form. I didn't see any comments on the additional forms. Did  
9 you see anything related to those? And so I guess I'm just  
10 like wondering if that is the only form, if it's worth an  
11 annotation or not I guess is where I was going.

12 BOARD MEMBER NANDWANI: Sure. First, yeah, that's a  
13 good catch and I saw this morning it's 2022 and wanted to  
14 brought to your attention that that's a typo. Going back to  
15 your question on sodium alginates, there was one comment in the  
16 stakeholders. I think we received 12 comments from  
17 stakeholders. And they were in favor of relisting. But one of  
18 the comment mentioned about the sodium alginates. And I have  
19 additional information here. I can read it. I don't know if  
20 you can also read about this regarding your question that we  
21 discussed in the subcommittee also. And I think that links to  
22 Franklin that the seaweed used to produce alginates that used  
23 for bioremediation and the potential for having a contamination  
24 (ph.) determined that these are likely from different sources.

25 Additional, though, FDA, Food and Drug Administration

1 regulates having micro-testing of sodium alginates and,  
2 therefore, the subcommittee is not considering the continued  
3 listing of alginates. That's all I have. I hope I added some  
4 information, if not full.

5 BOARD MEMBER SMITH: Yeah. Just I don't know that we  
6 got a lot of public comments on other sources, so it would be  
7 interesting to continue to keep that as part of the discussion.

8 CHAIR POWELL-PALM: Any other discussion? Thank you,  
9 Dilip. We'll go to the motion.

10 BOARD MEMBER SMITH: Motion to remove alginates from  
11 the National List was motioned by Dilip, seconded by myself,  
12 Kyla.

13 CHAIR POWELL-PALM: All right. Let me think for a  
14 second. It's going to be Amy is our first vote.

15 SECRETARY BRUCH: No.

16 CHAIR POWELL-PALM: Kim?

17 BOARD MEMBER HUSEMAN: No.

18 CHAIR POWELL-PALM: Franklin?

19 BOARD MEMBER QUARCOO: Abstain.

20 CHAIR POWELL-PALM: Wood?

21 BOARD MEMBER TURNER: Abstain.

22 CHAIR POWELL-PALM: Logan?

23 BOARD MEMBER PETREY: No.

24 CHAIR POWELL-PALM: Carolyn?

25 BOARD MEMBER DIMITRI: No.

1 CHAIR POWELL-PALM: Allison?

2 BOARD MEMBER JOHNSON: No.

3 CHAIR POWELL-PALM: Brian?

4 BOARD MEMBER CALDWELL: Abstain.

5 CHAIR POWELL-PALM: Nate?

6 BOARD MEMBER LEWIS: No.

7 CHAIR POWELL-PALM: Dilip?

8 BOARD MEMBER NANDWANI: No.

9 CHAIR POWELL-PALM: Gerry?

10 BOARD MEMBER D'AMORE: No.

11 CHAIR POWELL-PALM: Kyla?

12 BOARD MEMBER SMITH: No.

13 CHAIR POWELL-PALM: And the Chair votes no.

14 SECRETARY BRUCH: Zero yes, 10 no, 3 abstentions,  
15 zero recusals, 2 absent. The motion fails.

16 BOARD MEMBER SMITH: Okay. 205.605(b)(8) is calcium  
17 hydroxide. And this is also Dilip's material.

18 BOARD MEMBER NANDWANI: Okay. Thanks again. Calcium  
19 hydroxide is used in food processing as a buffer neutralizing  
20 agent and firming agent processing. It is also used in making  
21 calcium acid phosphate and in nutrient supplements. Calcium  
22 hydroxide is produced through four steps. I'm not going to go  
23 into those details, but the first is the mining of limestone  
24 and then preparation of the limestone for the furnaces. And  
25 then calcium mining the limestone and then hydroxide (ph.),

1 which is mixing with the water to make the quick lime.

2           The temperature for this fourth step, while gas line  
3 for exit temperatures achieved in the home kitchen, which the  
4 NOSB has previously considered decisive integrin substances  
5 synthetic. So we have the new TR on calcium hydroxide.  
6 According to that we don't see any new techniques for the  
7 manufacture of calcium hydroxide new to that lab.

8           Public comments. During the previous sunset review  
9 submitted by organic manufacturers, trade associations,  
10 material suppliers, and certifiers, detail calcium hydroxide  
11 use a necessity in the processing. The majority of public  
12 comments supported relisting of calcium hydroxide. One  
13 commenter suggested that NOSB clarify which uses of calcium  
14 hydroxide are permitted, specifically if calcium hydroxide can  
15 be used as a firming agent. Additional commenters stated that  
16 they use calcium hydroxide in infant formula.

17           NOSB received 11 public comments all in favor of  
18 relisting of calcium hydroxide. The NOSB did not receive much  
19 response to the questions it asked in the spring review. A  
20 couple of commenters said that they are not aware of any  
21 commercially available alternatives. That's all I have.

22           CHAIR POWELL-PALM: Thank you. Any questions or  
23 comments for Dilip on calcium hydroxide? All right, we'll go  
24 to the motion.

25           BOARD MEMBER SMITH: The motion to remove calcium

1 hydroxide from the National List was motioned by Dilip and  
2 seconded by Gerry.

3 CHAIR POWELL-PALM: And we'll start the voting  
4 with Kim.

5 BOARD MEMBER HUSEMAN: No.

6 CHAIR POWELL-PALM: Franklin?

7 BOARD MEMBER QUARCOO: No.

8 CHAIR POWELL-PALM: Wood?

9 BOARD MEMBER TURNER: No.

10 CHAIR POWELL-PALM: Logan?

11 BOARD MEMBER PETREY: No.

12 CHAIR POWELL-PALM: Carolyn?

13 BOARD MEMBER DIMITRI: No.

14 CHAIR POWELL-PALM: Allison?

15 BOARD MEMBER JOHNSON: No.

16 CHAIR POWELL-PALM: Brian?

17 BOARD MEMBER CALDWELL: No.

18 CHAIR POWELL-PALM: Nate?

19 BOARD MEMBER LEWIS: No.

20 CHAIR POWELL-PALM: Dilip?

21 BOARD MEMBER NANDWANI: No.

22 CHAIR POWELL-PALM: Gerry?

23 BOARD MEMBER D'AMORE: No.

24 CHAIR POWELL-PALM: Kyla?

25 BOARD MEMBER SMITH: No.

1 CHAIR POWELL-PALM: Amy?

2 SECRETARY BRUCH: No.

3 CHAIR POWELL-PALM: And the Chair votes no.

4 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
5 zero recusals, 2 absent. The motion fails.

6 BOARD MEMBER SMITH: Okay. Next is ethylene. It's  
7 listed at 205.605(b)(14), ethylene allowed for post-harvest  
8 ripening of tropical fruit and degrading of citrus. And this  
9 is also -- Logan had ethylene in crops and she also took it on  
10 in handling as well. Logan?

11 BOARD MEMBER PETREY: All right, because it's easy to  
12 take on the same one. Thank you, Kyla. Yes, okay. So  
13 ethylene, it's uses are for post-harvest handling. And we see  
14 this in bananas. We see this in avocados, mangoes, citrus  
15 fruits. We went over the manufacturing, the human and  
16 environmental health concerns, yesterday. So for time's sake,  
17 we'll go on, unless you have questions that also share the same  
18 TR.

19 Historically, there was also a petition for the use  
20 in pears and that did not pass. There is a statement that  
21 there are no alternatives existing. The question was asked  
22 what would the impact be if ethylene was no longer allowed. A  
23 commenter stated because the fruit reaches internal maturity  
24 for shipment prior to reaching full color and fresh -- for  
25 fresh shipments, without ethylene would lose 30 to 60 days or

1 1/3rd of our shipping season. These economic losses would  
2 devastate our company.

3 That is because a lot of these fruits cannot be  
4 produced domestically and so we are sourcing these fruits. And  
5 these fruits are a huge part of our industry, the tropical  
6 fruits. And they are part of our American diet. I think it's  
7 on record my child eats a lot of bananas.

8 Many of these fruits are not produced domestically  
9 and -- sorry, removal of ethylene as post-harvest treatment  
10 would create a major disruption in the supply chain. One  
11 advocacy group did say and state that they opposed the  
12 relisting and said that this material was not necessary for its  
13 listing. There is also -- there was also interest in possibly  
14 expanding its use to -- for sprouting, as a sprouting inhibitor  
15 for storage potatoes. A petition would be needed for this  
16 listing. Canadian and EU standards do allow this material as a  
17 sprout inhibitor for potatoes.

18 CHAIR POWELL-PALM: Questions for Logan? Gerry,  
19 please go ahead.

20 BOARD MEMBER D'AMORE: Thank you. I agree with  
21 everything that was said, but I forgot that, that it's actually  
22 as you went through it I think it's understated. I think  
23 there's some things that we just flat wouldn't have at all,  
24 bananas being one of them. My 10 years with Chiquita and  
25 worldwide shipping of bananas, they are shipped green. And

1 they're not -- they're not ripe. The ripening process doesn't  
2 start at all until they reach destination and then they are  
3 ripened in a -- in a ripening room. And I can flat say bananas  
4 as we know them on our shelf today would not exist without it.

5 CHAIR POWELL-PALM: Nate?

6 BOARD MEMBER LEWIS: I think this is an interesting  
7 annotation that's sort of illustrative of the challenges of  
8 annotations in that when you use words like tropical that are  
9 somewhat vague, it makes the certification process a little bit  
10 harder. So what about an avocado grown north of the 23 1/2  
11 parallel. Is that a tropical fruit or not? And I think  
12 certifiers, they have the competence to make those  
13 determinations.

14 But I think when I read between the lines, this  
15 annotation is to prohibit its use as a tomato ripener, but I  
16 don't know if that's true or not. So I think it's just a  
17 lesson in if we want to annotate, let's be extremely clear  
18 about what it is we're doing so that we take the guesswork out  
19 of making sure people are following the rules.

20 BOARD MEMBER PETREY: I'm glad you mentioned that,  
21 because we did ask that in the spring comments, what are  
22 tropical fruits. And we, we got a list of some things that we,  
23 we still don't have that strong definition. So that is a great  
24 point.

CHAIR POWELL-PALM: Gerry?

25 BOARD MEMBER D'AMORE: It's been a while since I've



1 dealt with tomatoes. But I would still venture to guess that  
2 over 50 percent of all tomatoes consumed by us have gone  
3 through an ethylene ripening process.

4 CHAIR POWELL-PALM: Any other questions or comments?  
5 All right, thank you, Logan. We'll go to the motion.

6 BOARD MEMBER SMITH: The motion to remove ethylene  
7 from the National List was made by Logan and seconded by Gerry.

8 CHAIR POWELL-PALM: We're going to start with  
9 Franklin.

10 BOARD MEMBER QUARCOO: No.

11 CHAIR POWELL-PALM: Wood?

12 BOARD MEMBER TURNER: No.

13 CHAIR POWELL-PALM: Logan?

14 BOARD MEMBER PETREY: No.

15 CHAIR POWELL-PALM: Carolyn?

16 BOARD MEMBER DIMITRI: No.

17 CHAIR POWELL-PALM: Allison?

18 BOARD MEMBER JOHNSON: No.

19 CHAIR POWELL-PALM: Brian?

20 BOARD MEMBER CALDWELL: No.

21 CHAIR POWELL-PALM: Nate?

22 BOARD MEMBER LEWIS: No.

23 CHAIR POWELL-PALM: Dilip?

24 BOARD MEMBER NANDWANI: No.

25 CHAIR POWELL-PALM: And Gerry?

1 BOARD MEMBER D'AMORE: No.

2 CHAIR POWELL-PALM: Kyla?

3 BOARD MEMBER SMITH: No.

4 CHAIR POWELL-PALM: Amy?

5 SECRETARY BRUCH: No.

6 CHAIR POWELL-PALM: Kim?

7 BOARD MEMBER HUSEMAN: No.

8 CHAIR POWELL-PALM: And the Chair votes no.

9 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
10 zero recusals, 2 absent. The motion fails.

11 BOARD MEMBER SMITH: The next material is glycerides,  
12 mono and di, at 205.605(b)(16). Glycerides, mono and di, for  
13 use only in drum drying of food. And this material is Allison.

14 BOARD MEMBER JOHNSON: Thank you. So glycerides are  
15 components of fats. They are used as an emulsifier and release  
16 agent in drum drying processes in organic, so creating flakes  
17 or powders. I think this product is basically still on the  
18 list so that organic potato flakes exist. Back in 1995, the  
19 NOSB had noted that the food industry is moving away from this  
20 material, but it was still really needed for potato flake  
21 products.

22 There are some potential alternatives, but apparently  
23 none are quite equivalent. And we've asked now spring and fall  
24 what organic products glycerides are used in and whether there  
25 are any alternatives. And we still haven't heard from anyone

1 who actually uses the material or is aware of a specific  
2 organic product that uses it.

3           We did have one commenter who ran a search in USDA's  
4 food data central data of branded foods, which I don't know  
5 anything about but looks interesting. And I tried to replicate  
6 their search. You can actually pull this huge list of branded  
7 products and their ingredients. I don't know why this list  
8 exists or how we might use it, but it seems interesting. So  
9 I'd love if someone brings it forward in the future to have  
10 them provide a little bit more context.

11           But as far as I could tell, the numbers that this  
12 commenter put together are not actually certified organic  
13 products. They are products where there is maybe an organic  
14 ingredient or two in glycerides, so it doesn't help us figure  
15 out if organic products need this ingredient. I did spend some  
16 time on Google, probably more than a reasonable amount of time  
17 on Google trying to find if a product exists and I found one.  
18 And that manufacturer's website says that glycerides are  
19 necessary for their process. So we haven't heard directly from  
20 that producer, but they are making that statement to the  
21 public. And so I think there is an argument for keeping it.

22           We did have a couple of commenters suggest that there  
23 may be organic agricultural alternatives, so I hope we can kind  
24 of put a pin in that and hope that next time around maybe we  
25 ask for an updated TR that looks at the technology again and

1 really push on that potential commercial availability option,  
2 because there are also products that don't have glycerides that  
3 are marketed as organic potato flakes. So it seems possible,  
4 but I don't know. We don't have enough information about  
5 individual manufacturers' processes. Any questions?

6 CHAIR POWELL-PALM: Wood. Then Amy.

7 BOARD MEMBER TURNER: Thanks, Allison. So the  
8 product you found was potato flakes?

9 BOARD MEMBER JOHNSON: Yeah, one organic potato  
10 flakes product with potatoes and mono and diglycerides as the  
11 ingredients.

12 CHAIR POWELL-PALM: Amy?

13 SECRETARY BRUCH: Allison, hi. Just a quick  
14 question. Thanks for that review. You mentioned in 1995, when  
15 this product was added, that the -- that the thought was that  
16 industry was going to move away from this. What were they  
17 going to move to?

18 BOARD MEMBER JOHNSON: That's a good question. It  
19 said they were trying to move away from glycerides. And I  
20 think there are like some of the examples that came up are rice  
21 brand extract, soy lecithin, gum arabic. So there may be other  
22 emulsifiers and release agents that could work. And then maybe  
23 alternative processes that could work or a sort of more  
24 advanced drum drying technology. But we -- the last TR was in  
25 2015 and it didn't indicate that there was no longer a need.

1 SECRETARY BRUCH: Thank you.

2 CHAIR POWELL-PALM: Nate?

3 BOARD MEMBER LEWIS: These are -- this is a  
4 processing aid, right? So -- or is it an ingredient?

5 BOARD MEMBER JOHNSON: I guess it's an ingredient.  
6 It shows up on the label.

7 BOARD MEMBER LEWIS: It does.

8 BOARD MEMBER JOHNSON: Yeah.

9 BOARD MEMBER LEWIS: In all cases? Like if I were to  
10 make organic, you know, organic Pringles with dehydrated potato  
11 flakes, would it also list mono/diglycerides?

12 BOARD MEMBER JOHNSON: It's a good -- I don't know if  
13 there are instances where it does not show up on the label, but  
14 there are instances where it does show up on the label.

15 BOARD MEMBER LEWIS: Okay. All right. Well, suffice  
16 it -- anyway, thank you.

17 CHAIR POWELL-PALM: Brian?

18 BOARD MEMBER CALDWELL: So this -- thank you for all  
19 your diligent work, Allison. In my mind, this is -- this is a  
20 real question of whether the material is essential or not. It  
21 sounds to me like it's not. And I guess, Allison, I have a  
22 question. Are there any health downsides with, with these  
23 materials?

24 BOARD MEMBER JOHNSON: I don't think so. There  
25 wasn't anything particularly concerning for the environment or

1 health noted in the TR. They are components of that. So fatty  
2 acid has -- it's like an arm and -- or like a backbone and  
3 three arms, so these are the arms. We cut them off. That  
4 sounds kind of -- it's just a molecule. But they are products  
5 of conventional agriculture, so presumably produced with  
6 synthetic inputs. So to the extent that there is an opinion to  
7 move away from that and toward an organic alternative, or just  
8 eliminate them from the organic supply chain completely has the  
9 benefits of shifting toward organic. But nothing particular  
10 concerning about it that weigh heavily against continuing to  
11 allow it.

12 BOARD MEMBER CALDWELL: Thank you very much.

13 CHAIR POWELL-PALM: Kim?

14 BOARD MEMBER HUSEMAN: Allison, great review. As we  
15 look to try to identify who, where this is being used, and  
16 looking at the international acceptance, did you happen to poke  
17 into maybe some of the Canadian products? It looks like Canada  
18 has a permitted product. No other international acceptances  
19 were listed.

20 BOARD MEMBER JOHNSON: I didn't dig very deep. Yeah,  
21 it's not consistent against our trade partners whether it's  
22 allowed or not. Like we're looking at a pretty small subset,  
23 it seems like. So, yeah, I don't have more information to  
24 share, sorry.

25 BOARD MEMBER HUSEMAN: It's okay. Thank you,

1 Allison.

2 CHAIR POWELL-PALM: Nate?

3 BOARD MEMBER LEWIS: Sorry to keep pushing this. But  
4 I did find Shiloh Farms on the -- is that the one? And it is  
5 PCO certified, so, with list as mono-diglycerides as an  
6 ingredient in it. So I may have resolved my earlier question.

7 CHAIR POWELL-PALM: Brian?

8 BOARD MEMBER CALDWELL: So sort of just a kind of  
9 procedural question. But if, if this is delisted, can it be  
10 repetitioned to be added back onto the list?

11 CHAIR POWELL-PALM: Mm-hmm.

12 BOARD MEMBER CALDWELL: Okay.

13 CHAIR POWELL-PALM: Any other questions or comments  
14 before we go to the vote? Allison?

15 BOARD MEMBER JOHNSON: Just responding to Brian.

16 CHAIR POWELL-PALM: Sure.

17 BOARD MEMBER JOHNSON: Or, yeah, to Brian. This room  
18 is starting to turn into a blur.

19 CHAIR POWELL-PALM: Finally, someone else besides me.

20 (Laughter.)

21 BOARD MEMBER JOHNSON: I was kind of wrestling with  
22 like, well, okay, if we pull it off, they have probably about  
23 two years to change process or come up with an alternative  
24 before it was actually pulled off the list, so there would be  
25 time to accommodate or to petition back. But the website of

1 the one that I found did say explicitly we really need this.  
2 So do we make that one producer change or do we say, okay, one  
3 is enough. It's a hard call.

4 CHAIR POWELL-PALM: I don't find it to be a hard  
5 call, only because it's just -- I mean how cool is it that we  
6 have someone trying to make organic potato chips. And it's --  
7 and it's going to be a small producer. And I think it's very  
8 interesting that they took the opportunity to put that  
9 explanation on the website. Sure does make it a lot easier for  
10 us to understand its utility. Brian?

11 BOARD MEMBER CALDWELL: But potato chips are  
12 different than potato flakes.

13 CHAIR POWELL-PALM: Potato flakes, yeah.

14 BOARD MEMBER CALDWELL: And I think there's a lot of  
15 organic potato chips.

16 CHAIR POWELL-PALM: Mm-hmm.

17 BOARD MEMBER JOHNSON: Yeah. And from what I can  
18 tell, it's also different from dried mashed potatoes.

19 CHAIR POWELL-PALM: Good distinction. Nate?

20 BOARD MEMBER LEWIS: This will be my last. But come  
21 on, Brian, organic Pringles? I mean --

22 CHAIR POWELL-PALM: Any other thoughts before we go  
23 to the vote? All right. Kyla, please.

24 BOARD MEMBER SMITH: The motion to remove glycerides,  
25 mono and di, from the National List was motioned by Allison and



1 seconded by Gerry.

2 CHAIR POWELL-PALM: And we're going to start with  
3 Wood.

4 BOARD MEMBER TURNER: Abstain.

5 CHAIR POWELL-PALM: Logan?

6 BOARD MEMBER PETREY: No.

7 CHAIR POWELL-PALM: Carolyn?

8 BOARD MEMBER DIMITRI: No.

9 CHAIR POWELL-PALM: Allison?

10 BOARD MEMBER JOHNSON: No.

11 CHAIR POWELL-PALM: Brian?

12 BOARD MEMBER CALDWELL: Yes.

13 CHAIR POWELL-PALM: Nate?

14 BOARD MEMBER LEWIS: No.

15 CHAIR POWELL-PALM: Dilip?

16 BOARD MEMBER NANDWANI: No.

17 CHAIR POWELL-PALM: Gerry?

18 BOARD MEMBER D'AMORE: No.

19 CHAIR POWELL-PALM: Kyla?

20 BOARD MEMBER SMITH: No.

21 CHAIR POWELL-PALM: Amy?

22 SECRETARY BRUCH: No.

23 CHAIR POWELL-PALM: Kim?

24 BOARD MEMBER HUSEMAN: Abstain.

25 CHAIR POWELL-PALM: Franklin?

1 BOARD MEMBER QUARCOO: No.

2 CHAIR POWELL-PALM: And the Chair votes no.

3 BOARD MEMBER DIMITRI: I have to say, Nate, you  
4 really got me with the small producer angle. Like I was  
5 wavering and then you said that. I thought, yeah.

6 CHAIR POWELL-PALM: I would just call out again how I  
7 so appreciate these discussions. This, I mean, in another  
8 world this could turn gnarly. And thank you, Brian, for  
9 bringing such a fair contemplation to the discussion. So I  
10 appreciate that.

11 SECRETARY BRUCH: One yes, 10 no, 2 abstentions, zero  
12 recusals, 2 absent. The motion fails.

13 BOARD MEMBER SMITH: Okay. Next up is magnesium  
14 stearate. Magnesium stearate is listed at 205.605(b)(19).  
15 Magnesium stearate for use only in agricultural products  
16 labeled made with organic, parentheses, specified ingredients  
17 or food groups, end parentheses, prohibited in agricultural  
18 products labeled organic. And this material is also Allison.

19 BOARD MEMBER JOHNSON: Thank you. This is another  
20 like quite narrow use item. It's most commonly used as a  
21 binding agent in supplements or an anti-caking agent in  
22 powdered products. It's made from hydrogenation of fatty acids  
23 from edible sources that go through several chemical reactions.  
24 And again we asked in the spring and again in the fall how this  
25 product is being used by organic processors and whether there

1 are any alternatives.

2 For this one, we had one commenter say that they have  
3 three members who use magnesium stearate in pharmaceutical and  
4 dietary products. We got a couple of support generally and a  
5 couple of not particularly opposed. We did get one commenter  
6 who said that they'd like to see more information on the need  
7 for it and also pointed out the office as the -- the National  
8 List substances need to be listed by specific use or  
9 application. I think that was a comment that came up  
10 repeatedly. So that's something that we could consider. But  
11 in use, no particular opposition to continued use.

12 CHAIR POWELL-PALM: Questions for Allison on  
13 magnesium stearate? All right, go to the motion.

14 BOARD MEMBER SMITH: The motion to remove magnesium  
15 stearate from the National List was motioned by Allison,  
16 seconded by myself, Kyla.

17 CHAIR POWELL-PALM: And we're going to start with  
18 Logan.

19 BOARD MEMBER PETREY: No.

20 CHAIR POWELL-PALM: Carolyn?

21 BOARD MEMBER DIMITRI: No.

22 CHAIR POWELL-PALM: Allison?

23 BOARD MEMBER JOHNSON: No.

24 CHAIR POWELL-PALM: Brian?

25 BOARD MEMBER CALDWELL: No.

1 CHAIR POWELL-PALM: Nate?

2 BOARD MEMBER LEWIS: No.

3 CHAIR POWELL-PALM: Dilip?

4 BOARD MEMBER NANDWANI: No.

5 CHAIR POWELL-PALM: Gerry?

6 BOARD MEMBER D'AMORE: No.

7 CHAIR POWELL-PALM: Kyla?

8 BOARD MEMBER SMITH: No.

9 CHAIR POWELL-PALM: Amy?

10 SECRETARY BRUCH: No.

11 CHAIR POWELL-PALM: Kim?

12 BOARD MEMBER HUSEMAN: No.

13 CHAIR POWELL-PALM: Franklin?

14 BOARD MEMBER QUARCOO: No.

15 CHAIR POWELL-PALM: Wood?

16 BOARD MEMBER TURNER: No.

17 CHAIR POWELL-PALM: And the Chair votes no.

18 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
19 zero recusals, 2 absent. The motion fails.

20 BOARD MEMBER SMITH: Hold on one second, I have to  
21 get to my notes. Okay. Phosphoric acid is listed at  
22 205.605(b)(23), phosphoric acid, cleaning of food contact  
23 surfaces and equipment only. Phosphoric acid is my material.  
24 So phosphoric acid is used in organic handling and processing  
25 as a cleaning agent for food contact surfaces and equipment.

1 This use spans across many different types of operations from  
2 dairies, to processed product handlers, to post-harvest  
3 handling uses, so a wide range of, of uses.

4 We received about a dozen comments. All were in  
5 favor of continuing to list. Some comments focused on the  
6 difference between the annotations between the livestock list  
7 and the handling list, noting that because there are two  
8 listings and that they are annotated differently that for like  
9 a dairy handler operation there is a fine line to know which  
10 annotation to follow. Some comments focused on the seemingly  
11 inaccurate term of, of cleaner in the annotation and how it's  
12 actually being used. Some comments were a bit more broadly  
13 focused and applicable to all sanitizers and not specific to  
14 phosphoric acid. Again, there is a call for the Board to take  
15 up sanitizers as a work agenda item and do a comprehensive  
16 review of sanitizers.

17 As mentioned during the livestock subcommittee review  
18 on this material, I did check in with the ACA materials working  
19 group. And I covered some of the comments that were particular  
20 to livestock during the discussion there, so I'll focus on what  
21 was commented on the handling listing. And so it was stated  
22 that even though there is the use of the term cleaner in the  
23 annotation, that there is consensus among certifiers to allow  
24 the substance as a no-rinse sanitizer. There was also  
25 recognition from that working group of the inconsistency again

1 broadly on how certifiers are reviewing sanitizers. This is  
2 described in the ACA best practice document. And again those  
3 comments are not specific to phosphoric acid, but were made  
4 broadly. That's it.

5 CHAIR POWELL-PALM: Questions for Kyla on phosphoric  
6 acid? Franklin?

7 BOARD MEMBER QUARCOO: Did the committee discuss some  
8 of the environmental impact that is listed under phosphoric  
9 acid?

10 BOARD MEMBER SMITH: Well, Franklin, I'm having to go  
11 back into my head. Did that say that? I just don't remember.  
12 I don't remember us focusing too much on the environmental  
13 impacts much during the subcommittee review. I will say that  
14 it does -- in the TR, it does indicate that it is, I mean  
15 basically what it just says here, that it's relatively benign  
16 regarding the impact to the environment. But the processing  
17 steps are where there is more concern. But I don't remember  
18 that being a big focus of the subcommittee's discussion.  
19 Anybody who --

20 BOARD MEMBER QUARCOO: Thank you.

21 BOARD MEMBER SMITH: -- participated in the  
22 discussion is welcome to weigh in. I just don't remember that  
23 far back.

24 CHAIR POWELL-PALM: Any other questions or comments?  
25 All right, we'll go to -- oh, Amy?

1           SECRETARY BRUCH: I was just going to ask you, Kyla,  
2 thank you for your review on the stakeholder request to get an  
3 annotation for the handling version, handling listing of  
4 phosphoric acid to match similarly to livestock.

5           BOARD MEMBER SMITH: Yeah. I definitely think that  
6 is, yeah, possible for sure. It would be -- it will be -- I  
7 feel like that that's interesting because -- but, yes, I think  
8 we can certainly talk about it. Just I -- the post-harvest  
9 handling aspect is always an intriguing part of the organic  
10 production and certification process to me.

11           CHAIR POWELL-PALM: All right. If not further  
12 discussion, we'll go to the motion.

13           BOARD MEMBER SMITH: The motion to remove phosphoric  
14 acid from the National List was made by myself, Kyla, and  
15 seconded by Allison.

16           CHAIR POWELL-PALM: All right. We'll start the  
17 voting with Carolyn.

18           BOARD MEMBER DIMITRI: No.

19           CHAIR POWELL-PALM: Allison?

20           BOARD MEMBER JOHNSON: No.

21           CHAIR POWELL-PALM: Brian?

22           BOARD MEMBER CALDWELL: No.

23           CHAIR POWELL-PALM: Nate?

24           BOARD MEMBER LEWIS: No.

25           CHAIR POWELL-PALM: Dilip?

1 BOARD MEMBER NANDWANI: No.

2 CHAIR POWELL-PALM: Gerry?

3 BOARD MEMBER D'AMORE: No.

4 CHAIR POWELL-PALM: Kyla?

5 BOARD MEMBER SMITH: No.

6 CHAIR POWELL-PALM: Amy?

7 SECRETARY BRUCH: No.

8 CHAIR POWELL-PALM: Kim?

9 BOARD MEMBER HUSEMAN: No.

10 CHAIR POWELL-PALM: Franklin?

11 BOARD MEMBER QUARCOO: No.

12 CHAIR POWELL-PALM: Wood?

13 BOARD MEMBER TURNER: No.

14 CHAIR POWELL-PALM: Logan?

15 BOARD MEMBER PETREY: No.

16 CHAIR POWELL-PALM: And the Chair votes no.

17 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
18 zero recusals, 2 absent. The motion fails.

19 BOARD MEMBER SMITH: Next up is potassium carbonate.  
20 So this is listed at 205.605(b)(24), potassium carbonate. And  
21 this is Kim.

22 BOARD MEMBER HUSEMAN: Okay. Unlike calcium  
23 carbonate, potassium carbonate, although still has a lot of  
24 different uses, it's a little bit more narrow scope. We did  
25 get a new TR on potassium carbonate in 2023, so we had that for



1 review as well. I would say, though, there has been some  
2 modernization into the, the manufacturing process of potassium  
3 carbonate. That was -- that was mentioned through the TR.

4 The spring comments and I'll follow with fall  
5 comments were very consistent that there's significant support  
6 for relisting. There, there was one commenter that would  
7 request that an annotation be made that potassium carbonate  
8 only be used when sodium carbonate wouldn't be appropriate, as  
9 it is used to reduce the salt content. Another, another one  
10 also mentioned that it be listed out by use and then evaluated  
11 for essentiality. But the other commenters were in support  
12 without additional information. So I feel like that, that kind  
13 of covers potassium carbonate.

14 CHAIR POWELL-PALM: And 'm the biggest offender here.  
15 But if everyone brings the mike much closer to their mouth and  
16 just speaks up a little bit, I think I'm getting notes that the  
17 folks on zoom can't hear us.

18 BOARD MEMBER HUSEMAN: Would you like for me -- I can  
19 repeat that whole conversation.

20 CHAIR POWELL-PALM: I think we have time.

21 BOARD MEMBER HUSEMAN: I was extending it out as much  
22 as I could already, Nate, but --

23 CHAIR POWELL-PALM: That is all right.

24 BOARD MEMBER HUSEMAN: -- thank you for the reminder.

25 CHAIR POWELL-PALM: Questions for Kim from the Board?

1 With that, we'll go to the motion.

2 BOARD MEMBER SMITH: The motion to remove potassium  
3 carbonate from the National List was motioned by Kim and  
4 seconded by myself, Kyla.

5 CHAIR POWELL-PALM: All right. And we're going to  
6 start with Allison.

7 BOARD MEMBER JOHNSON: No.

8 CHAIR POWELL-PALM: Brian?

9 BOARD MEMBER CALDWELL: No.

10 CHAIR POWELL-PALM: Nate?

11 BOARD MEMBER LEWIS: No.

12 CHAIR POWELL-PALM: Dilip?

13 BOARD MEMBER NANDWANI: No.

14 CHAIR POWELL-PALM: Gerry?

15 BOARD MEMBER D'AMORE: No.

16 CHAIR POWELL-PALM: Kyla?

17 BOARD MEMBER SMITH: No.

18 CHAIR POWELL-PALM: Amy?

19 SECRETARY BRUCH: No.

20 CHAIR POWELL-PALM: Kim?

21 BOARD MEMBER HUSEMAN: No.

22 CHAIR POWELL-PALM: Such a good no. Franklin?

23 BOARD MEMBER QUARCOO: No.

24 CHAIR POWELL-PALM: Wood?

25 BOARD MEMBER TURNER: No.

1 CHAIR POWELL-PALM: Logan?

2 BOARD MEMBER PETREY: No.

3 CHAIR POWELL-PALM: Carolyn?

4 BOARD MEMBER DIMITRI: No.

5 CHAIR POWELL-PALM: And the Chair votes no.

6 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
7 zero recusals, 2 absent. The motion fails.

8 BOARD MEMBER SMITH: Next up is sulfur dioxide. This  
9 is listed at 205.605(b)(35), sulfur dioxide for use only in  
10 wine labelled, quote, "Made with organic grapes," end quote,  
11 provided that total sulfite concentration does not exceed  
12 100 ppm. And this material is Allison's.

13 BOARD MEMBER JOHNSON: I have a beautiful story of  
14 public engagement to tell you all. Very excited. Okay. So  
15 sulfur dioxide is used to inhibit microbial growth, and prevent  
16 spoilage and oxidation in wines since Greek and Roman times.  
17 This is old, old material. Uh-oh, my computer just died.  
18 Okay, it's back. It's made from elemental sulfur and mineral  
19 ores, and waste material that contains sulfur. It's most  
20 difficult to burn it to get the, the gas.

21 It's added in various forms to wine. And we were  
22 trying to get some clarity from our commenters that for made  
23 with organic lines, it's added as a liquid or a gas. Potassium  
24 metabisulfite is a powdered form. OMRI states it's prohibited  
25 and several commenters understood that it is prohibited in made

1 with organic lines, so the, the powdered form is currently off  
2 the table. Several commenters actually noted that they  
3 switched from using potassium metabisulfite to access the made  
4 with organic lines label.

5 We asked in the spring to hear from wineries and  
6 certifiers, and got no comments. So we asked again and the  
7 community showed up. So thank you all. We wanted to hear more  
8 about the, the label theme made with organic grape, and what  
9 label themes are being used on wine made with organic grapes.  
10 And also asked about the form of sulfur dioxide, whether other  
11 forms might be preferable.

12 We had really great, detailed comments. We heard  
13 from the entire supply chain, a grape grower, several wineries,  
14 a packager, a retailer, a consumer, and several trade and  
15 advocacy groups. And the comments were really informative, in  
16 part because they weren't exactly the comments I was expecting  
17 to get. So that's, that's why we ask these questions.

18 In oral comments, we heard from a winery that uses  
19 sulfur dioxide and would drop certification if this material  
20 was delisted. And we also heard from a winery that has never  
21 used sulfur dioxide and sees a lot of growth in the organic  
22 wine sector that's produced without added sulfur dioxide.

23 In the written comments, four major points really  
24 came through clearly. First is that sulfur dioxide is  
25 dangerous. It's really had to work with. You have to wear a

1 respirator. Wineries don't like using this material. One  
2 commenter actually called it the most dangerous chemical that  
3 they use. Not great. SO2 is also expensive and hard to find.  
4 One commenter hadn't been able to expand to working on the East  
5 Coast because they can't source SO2 in the Greater New England  
6 area and it's too expensive to ship it from California.

7           So you can probably guess this would typically lead  
8 me to believe we should delist the material, except that it's  
9 also completely ubiquitous. There is no adequate alternative  
10 that has equivalent antioxidant and sterilant action. One  
11 commenter said that essentially the only producers who don't  
12 use it are those that are seeking the organic label on wine in  
13 the U.S. and that that is really a different style of  
14 winemaking, with a different and limited market. So again,  
15 several said that they would drop the made with organic label  
16 before they'd drop the SO2.

17           So that would leave us in a challenging position,  
18 except that we also were overwhelmingly offered a solution, which  
19 is to allow potassium metabisulfite. A bunch of winemakers  
20 expressed a really strong preference for that form because it's  
21 easier to use. It's safer. You don't have to wear a  
22 respirator. And it's easier to find and less expensive.

23           We also got several comments about potential  
24 annotation changes that we can't deal with this in process, but  
25 I'll name them just to acknowledge. We had suggestions to look

1 at the international allowed levels for sulfites that are more  
2 detailed than the U.S. rules. Suggestion to align labeling  
3 rules with Europe to improve consistency and simplify  
4 exporting. And to consider allowing SO<sub>2</sub> for all fermented  
5 fruit beverages. So we can't look at those in sunset, but we  
6 could take them up if we looked at annotation again in the  
7 future.

8           We did have one consumer who commented that they had  
9 a reaction to unlabeled sulfate in a medication and wanted  
10 clear labeling, which sounds like it must have been a terrible  
11 experience. I'm sorry for that person having to go through  
12 that. It's not clear if that's the same material that we're  
13 talking about here, but we do have strict sulfite labeling  
14 requirements on wine so it's always transparent to consumers  
15 who are sensitive. And we have the wineries that were  
16 mentioned in public comment that are making wine without  
17 sulfites and serving that consumer group.

18           So through all of that, I suggest two conclusions  
19 here. One, that we support relisting SO<sub>2</sub> because so many  
20 wineries rely on it. And the second is to our public that's  
21 listening, I hope someone petitions potassium metabisulfite.  
22 It sounds like it's safer. And we'd need to look at a TR and  
23 dig in, in more detail. But based on the comments so far, it  
24 seems like a strongly preferable option.

25           CHAIR POWELL-PALM: Thank you for that, Allison, that

1 thorough review. Questions for Allison from the Board? Logan,  
2 please go ahead.

3 BOARD MEMBER PETREY: That was great work. Thank  
4 you, Allison. No questions.

5 CHAIR POWELL-PALM: Wood?

6 BOARD MEMBER TURNER: That was fantastic. I mean I  
7 wish we would do that more often. That was just great. I mean  
8 just the data, just the data and the understanding, and just  
9 the conversations. That said, I was confused until your last  
10 statement. So --

11 CHAIR POWELL-PALM: Buried the lead.

12 BOARD MEMBER JOHNSON: Yeah, so two courses of action  
13 from here. It seems clear that we need to keep SO2 on the  
14 list, sulfur dioxide, as it's currently listed because so many  
15 wineries rely on it to get the made with organic claim. But  
16 also that it's a material with some problems. So one potential  
17 solution is to add potassium metabisulfite to the list, because  
18 it's a safer, easier to use alternative that's also cheaper.  
19 It's unusual that the whole package comes together. So maybe  
20 there is more information that we haven't seen. But there was  
21 a pretty resounding call for that material.

22 I, I checked in with our NOP advisors this morning and I  
23 don't think we can spontaneously list it as a Board, so someone  
24 would have to petition it. So consider this a receptive  
25 audience, if anyone is open to doing that.

1 CHAIR POWELL-PALM: Nate?

2 BOARD MEMBER LEWIS: Did you determine whether it's  
3 -- I mean is it one for one like in terms of functionality in  
4 wine? Like --

5 BOARD MEMBER JOHNSON: Yeah. Both deliver sulfur  
6 dioxide to the wine ultimately. The potassium metabisulfite  
7 comes as like a tablet or a powder, and the potassium and  
8 oxygen fall out in solution. I think one commenter said that  
9 the potassium actually might have nutritive value. But, yeah,  
10 equivalence and used pretty interchangeably with a strong  
11 preference for the tablet because it's easy and safer.

12 CHAIR POWELL-PALM: Kim?

13 BOARD MEMBER HUSEMAN: I know we really can't talk  
14 about unpetitioned, petitioned, potential petition items. But  
15 do you see anything in the international community from an  
16 import product of wines and maybe what other products might be  
17 being used today?

18 BOARD MEMBER JOHNSON: Yeah. Europe allows potassium  
19 metabisulfite and bisulfite, I think, and Canada does as well,  
20 I believe. So we're an outlier both in the limitation on the  
21 label theme and the limitation on the type of delivery of SO2.  
22 If there's any wines that you'd like to bring to the table, no  
23 pun intended, in the spring just to validate. Okay.

24 CHAIR POWELL-PALM: Kyla?

25 BOARD MEMBER SMITH: I mean I suppose it would be



1 dependent on if we do get a petition and what the petition  
2 says. But do you think that there -- that potassium  
3 metabisulfite would have the same made-with annotation or are  
4 we like opening up an opportunity here for organic wine?

5 BOARD MEMBER JOHNSON: It's a good question. I guess  
6 it would be up to the petitioner. And it would be up to us, I  
7 guess, if we wanted -- if there was a difference in what was  
8 petitioned and what we currently have listed, if we wanted to  
9 try to do some sort of reconciliation in the same process.

10 CHAIR POWELL-PALM: Other questions, comments? Okay.  
11 We'll go to the motion.

12 BOARD MEMBER SMITH: The motion to remove sulfur  
13 dioxide from the National List was motioned by Allison and  
14 seconded by Wood.

15 CHAIR POWELL-PALM: And we're going to start the  
16 voting with Brian.

17 BOARD MEMBER CALDWELL: No.

18 CHAIR POWELL-PALM: Nate?

19 BOARD MEMBER LEWIS: No.

20 CHAIR POWELL-PALM: Dilip?

21 BOARD MEMBER NANDWANI: No.

22 CHAIR POWELL-PALM: Gerry?

23 BOARD MEMBER D'AMORE: No.

24 CHAIR POWELL-PALM: Kyla?

25 BOARD MEMBER SMITH: No.

1 CHAIR POWELL-PALM: Amy?

2 SECRETARY BRUCH: No.

3 CHAIR POWELL-PALM: Kim?

4 BOARD MEMBER HUSEMAN: No.

5 CHAIR POWELL-PALM: Franklin?

6 BOARD MEMBER QUARCOO: No.

7 CHAIR POWELL-PALM: Wood?

8 BOARD MEMBER TURNER: No.

9 CHAIR POWELL-PALM: Logan?

10 BOARD MEMBER PETREY: No.

11 CHAIR POWELL-PALM: Carolyn?

12 BOARD MEMBER DIMITRI: No.

13 CHAIR POWELL-PALM: Allison?

14 BOARD MEMBER JOHNSON: No.

15 CHAIR POWELL-PALM: And the Chair votes no.

16 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
17 zero recusals, 2 absent. The motion fails.

18 BOARD MEMBER SMITH: We now move to 205.606. We are  
19 going to talk about fructoolingo -- ugh.

20 CHAIR POWELL-PALM: We had a rhythm there.

21 BOARD MEMBER SMITH: FOS. We already did the gums,  
22 yeah. Fructooligosaccharides. I practiced, guys, I promise.  
23 Anyway, we're at (g). And I'm going to just say FOS from now  
24 on and turn it over to Gerry.

25 BOARD MEMBER D'AMORE: And I'm just going to say what

1 she said. Before I get into this, I'd like to share an ah-ha  
2 moment that, that I've had this morning. It may be just me.  
3 To my colleagues, I'd like to say that going back all the way  
4 to the alginates and the glycerides, I was a little bit  
5 surprised by the nature of the questions and the intensity of  
6 the questions. And as I proceeded through this, I realized  
7 that from, from starting with alginate all the way through to  
8 fructooligosaccharides --

9 BOARD MEMBER SMITH: You did it.

10 BOARD MEMBER D'AMORE: Wow. That everything else has  
11 been -- everything's been synthetics allowed. And with the one  
12 that I'm going to present right now, it is non-agricultural  
13 substance allowed. And for me anyway and maybe nothing new for  
14 anybody else, that distinction is important in terms of the  
15 intensity with which I think we all, but I will share with you  
16 that I look at it. Does that make sense to you? Okay, thank  
17 you.

18 So I can already use the word -- I can say FOS,  
19 205.606, a non-organic, agricultural substance allowed as an  
20 ingredient in or on products labeled as organic. FOS is a  
21 nondigestible carbohydrate and is not used as a nutrient source  
22 for humans. It is a source of energy for probiotic bacteria  
23 residing in the human gut.

24 FOS is incorporated into milk products, cake,  
25 biscuits, cookies, crackers, yogurt, and ice cream, among other

1 foods. There is no information available from EPA or FDA to  
2 suggest environmental contamination from the use, misuse, or  
3 disposal of FOS. Further, there are no known harmful effects  
4 to human health.

5 During the last sunset review, so going back to 2018,  
6 FOS remained on 205.606 by a vote of 14 to 1. FOS was  
7 presented and discussed at our -- at our spring meeting, coming  
8 out of subcommittee with no votes for removal.

9 Stakeholder comments were light for this fall season  
10 or this fall session with about five total comments. Several  
11 of the stakeholder groups challenged FOS's status as an  
12 organic, excuse me, as an agricultural product. And they are  
13 insistent and there's two of them. Going back to the spring of  
14 2023 session, there were about 10 total comments. The same two  
15 groups challenged the agricultural status. Two groups took no  
16 position and six stakeholders were in support of relisting.

17 The Handling Subcommittee finds  
18 fructooligosaccharides compliant with the Organic Food  
19 Production Act and/or 205.600 and is not proposing removal.  
20 Thank you.

21 CHAIR POWELL-PALM: Questions for Gerry? Anyone?  
22 Logan? Oh, Amy. I'm sorry. Right out of my field of vision.

23 SECRETARY BRUCH: Thank you, Gerry. There was a  
24 comment that passed, is this an essential -- is this essential  
25 or is it necessary to make label claims. Do we need this for

1 product formulation or handling, or is it driven more from a  
2 marketing standpoint?

3 BOARD MEMBER D'AMORE: Actually, were I to answer  
4 that from -- in readings that I've done subsequent to putting  
5 this together, I would say that it's actually done for the  
6 simple reason that it's less calories than the -- than the  
7 alternatives. And it does not cause a spike in blood sugar.  
8 So I think there -- I think there is a legitimate reason for  
9 it.

10 CHAIR POWELL-PALM: Other questions? All right, we  
11 will go to the motion. And then after the motion we're just  
12 going to take a break. We're a couple of minutes behind our  
13 break.

14 BOARD MEMBER D'AMORE: We've got one more.

15 CHAIR POWELL-PALM: Oh, one more.

16 BOARD MEMBER D'AMORE: And it's mine. And I'm  
17 nervous. And I want to get it behind me.

18 CHAIR POWELL-PALM: Okay. One more and then we'll  
19 take our break. So thanks for bearing with us, folks.

20 BOARD MEMBER SMITH: Okay. Motion to remove  
21 fructooligosaccharides, I'm going to say it like that or else  
22 it doesn't work, form the National List. Motion to -- was made  
23 by Gerry and seconded by Dilip.

24 CHAIR POWELL-PALM: And starting with Nate, I think.

25 BOARD MEMBER LEWIS: No.

1 CHAIR POWELL-PALM: Dilip?  
2 BOARD MEMBER NANDWANI: No.  
3 CHAIR POWELL-PALM: Gerry?  
4 BOARD MEMBER D'AMORE: No.  
5 CHAIR POWELL-PALM: Kyla?  
6 BOARD MEMBER SMITH: No.  
7 CHAIR POWELL-PALM: Amy?  
8 SECRETARY BRUCH: No.  
9 CHAIR POWELL-PALM: Kim? Absent. Franklin?  
10 BOARD MEMBER QUARCOO: No.  
11 CHAIR POWELL-PALM: Wood?  
12 BOARD MEMBER TURNER: No.  
13 CHAIR POWELL-PALM: Logan?  
14 BOARD MEMBER PETREY: No.  
15 CHAIR POWELL-PALM: Carolyn?  
16 BOARD MEMBER DIMITRI: No.  
17 CHAIR POWELL-PALM: Allison?  
18 BOARD MEMBER JOHNSON: No.  
19 CHAIR POWELL-PALM: Brian?  
20 BOARD MEMBER CALDWELL: No.  
21 CHAIR POWELL-PALM: Kim. Present.  
22 BOARD MEMBER HUSEMAN: No.  
23 CHAIR POWELL-PALM: And the Chair votes no.  
24 SECRETARY BRUCH: Zero yes, 13 no, zero abstentions,  
25 zero recusals, 2 absent. The motion fails.

1 CHAIR POWELL-PALM: All right. Last handling  
2 material.

3 BOARD MEMBER SMITH: Last one. Lecithin is at --  
4 listed at 205.606(1), lecithin de-oiled. And this is also  
5 Gerry.

6 BOARD MEMBER D'AMORE: Thank you. So lecithin  
7 de-oiled, again it's 205.606, nonorganic agricultural substance  
8 allowed as an ingredient in or on products labeled as organic.  
9 The major uses of lecithin include as an emulsifier in  
10 margarine, chocolates, instantizers powders -- instantizing  
11 powders, release sprays, and baked goods. It is also used as a  
12 natural surfactant between oil and water systems, as with  
13 margarine. Lecithin is affirmed as generally recognized as  
14 safe, or GRAS, G-R-A-S, with no limitations other than current  
15 good manufacturing processes -- practices.

16 During the last sunset review in 2018, stakeholder  
17 comments centered around the availability of suitable and  
18 sufficient supply of organic raw material. Five years ago, it  
19 was felt that there was not sufficient supply or organic  
20 supply. This question of suitable and sufficient supply was  
21 addressed by the 2023 technical report which was received in  
22 early February of this year. And while some of it appears to be  
23 -- and while there appears to be some that are sub -- excuse  
24 me, alternatives as organic, it was noted that these  
25 alternatives do not result in the same quality of finished

1 product.

2           There are about 14 written and oral comments provided  
3 for this 2023 fall session, mostly being written. Not one  
4 entity came out with a clean no to a relisting. Three,  
5 however, strongly encouraged us to keep a close watch on  
6 suitable availability. Of these three comments, two said that  
7 with the war in Ukraine, this would be not an ideal time to  
8 delist in any case.

9           The Handling Subcommittee finds lecithin de-oiled  
10 compliant with the Organic Food Productions Act, OFPA, and with  
11 205.600, and is not proposing removal. Thank you.

12           CHAIR POWELL-PALM: Wood and then Kim.

13           BOARD MEMBER TURNER: Thanks, Gerry. Amy, question  
14 for you. Can you put this into context for me about some of  
15 the issues that you've been raising about Midwest organics, soy  
16 and corn, and whether this is -- this is just one of those  
17 issues that I just would love to understand more about sort of  
18 how and where growers in the Midwest are maybe potentially  
19 supplying, could be supplying organic lecithin. I mean I just  
20 don't understand, I don't understand what's going on here.

21           SECRETARY BRUCH: That makes two of us because, yes,  
22 we can grow these. Actually, we heard from one commenter  
23 through oral comments that he has sunflowers -- organic  
24 sunflowers sitting in his bin for over 11 months and not  
25 finding a market for it. So the U.S. is third in sunflower



1 production. Yes, Ukraine grows a lot of sunflowers. I don't  
2 know their percentage of organic. Russia grows a lot of  
3 sunflowers. I think they make up 50 percent of the sunflower  
4 production. Again, I don't know organic. But sunflowers are  
5 commonly grown. U.S. is number 3. North Dakota, South Dakota,  
6 Nebraska, Kansas, Texas. We can all grow those. I've grown  
7 them. Markets are very challenging, organic ones, to find.  
8 Obviously, they exist. So we just need to put two people  
9 together in a room and solve these issues pretty quickly, in my  
10 opinion. Thank you. And thank you, Gerry, that was a great,  
11 great review. You shouldn't have been nervous. Oh, Jenny, go  
12 ahead.

13 CHAIR POWELL-PALM: Obviously, I jump the queue for  
14 Jenny.

15 DR. TUCKER: I'm going to ask just a -- and I'm going  
16 to show probably my naivety here. Which TOPP region are we  
17 talking about? Because I think -- I mean this is where if  
18 we're talking about connecting buyers and sellers to identify  
19 these market gaps is part of what TOPP is here to do. So what  
20 region are we talking about here?

21 SECRETARY BRUCH: Plains.

22 DR. TUCKER: Okay. So this is a Plains region.  
23 Alexis, do you want to note that one down?

24 SECRETARY BRUCH: Let's talk, Alexis, at the break.

25 DR. TUCKER: Alexis is our project manager with the

1 TOPP region and I don't know if the Plains region is still in  
2 the room. But these are the kinds of conversations where --  
3 and this is also part of the reason we have the national  
4 agreement with Organic Trade Association and Rodale is to do  
5 kind of the buyer side education. And so if there's some -- I  
6 don't -- I don't know if there are options here, but this is  
7 why we have TOPP, part of why we have TOPP.

8 CHAIR POWELL-PALM: Go ahead, Kim.

9 BOARD MEMBER HUSEMAN: I wish that was an easier  
10 conversation and it was extremely straightforward, but I do  
11 hope the community is listening because the process of  
12 extracting the oil, and then breaking that down and  
13 individualizing it into its parts is very capital intensive.  
14 And there has to be a market available for the -- for the  
15 production to happen. I think that there, there is a component  
16 that's not quite as straightforward as if you build it, they  
17 will come.

18 But I think that this is a great opportunity. And  
19 with, with this product, Gerry, you had mentioned in the public  
20 comment that the organic version of lecithin may have some  
21 challenges from its counterparts as a conventional. The  
22 process of -- it's a very simple process to take oil and beans  
23 or to, to take a bean and divide it. But it's a lot more  
24 complicated to get down to the chemical components or have it  
25 -- to strip it further than that.

1           So was there any more explanation as to why the  
2 organic form may be subpar?

3           BOARD MEMBER D'AMORE: No, excuse me. It was just  
4 stated that generally speaking the alternatives did not -- did  
5 not bring forward a comparable product, finished product.

6           BOARD MEMBER HUSEMAN: Yeah. I think if we look at  
7 the overall production and the production capability, I agree  
8 with Amy that there's -- there should be the availability. But  
9 it just might not be that simplistic.

10          BOARD MEMBER D'AMORE: Well, and I should just leave  
11 that alone and let us go to lunch. But -- no, seriously, we've  
12 had the flavors or we had the colors, and now we're again  
13 talking about trying to get a, a group of potentially different  
14 things. For instance, we talked about the soy and the corn,  
15 and now the sunflower. So you've got egg yolks, soybeans,  
16 sunflower, canola, among other sources.

17          But the point is, is that on the supply, supply -- on  
18 the supply side, what you need is something that's consistent  
19 on, on a predictable annual basis. And that, to me, is also a  
20 barrier, as well as the expense of the extraction that you're  
21 talking about. How do you -- how do you collect it and make it  
22 centrally or regionally available to those who need it.

23          BOARD MEMBER HUSEMAN: So if there were processors of  
24 oils that might want to be on a panel for future --

25          BOARD MEMBER D'AMORE: Mm-hmm.

1 BOARD MEMBER HUSEMAN: Okay.

2 CHAIR POWELL-PALM: Let's go to Logan and then Nate.

3 BOARD MEMBER PETREY: Okay. So the non-organic part  
4 of this reference, it's like could we annotate it to say  
5 organic soybeans, but realize that the product coming out might  
6 not be organic, if you're saying that there's extra chemicals  
7 in the process.

8 BOARD MEMBER D'AMORE: That, that --

9 BOARD MEMBER PETREY: That's fine, okay.

10 BOARD MEMBER D'AMORE: That process, as far as I  
11 know, does not alter, does not take away its organic status.

12 BOARD MEMBER PETREY: Okay, right. Nope, that's  
13 okay.

14 CHAIR POWELL-PALM: Microphone, please. Microphone.

15 BOARD MEMBER PETREY: Okay, okay. And so you're  
16 saying just the organic soybean and the conventional soybean  
17 inherently have some differences that make this process  
18 different?

19 BOARD MEMBER HUSEMAN: The production of organic oils  
20 and how the oil seeds are -- like how the oil seeds go through  
21 the process conventional to organic are, are different.  
22 There's hexane, essentially. There's a chemical that's used,  
23 right, to strip the oil.

24 BOARD MEMBER PETREY: Right.

25 BOARD MEMBER HUSEMAN: And in organic, though,

1 obviously that's -- it's a very simple process. You take a  
2 bean. You heat it up. You press it. You have oil. You have  
3 meal. And I apologize to those that are doing this in the  
4 industry, to not oversimplify the process. But that being  
5 said, then you take that oil and you have to be able to remove  
6 the lecithin from --

7 BOARD MEMBER PETREY: Right.

8 BOARD MEMBER HUSEMAN: -- from the product. So, and  
9 it's, it's doable. What I was saying is, is there a reason why  
10 conventional methodology would provide a superior product to an  
11 organic methodology of making those two different products, to  
12 take that product off.

13 BOARD MEMBER PETREY: Okay. Could you have an  
14 organic soybean and a conventional methodology, if that's what  
15 we're -- is that what we're using?

16 BOARD MEMBER HUSEMAN: That would negate the  
17 situation, because you're still using hexane in the process.

18 BOARD MEMBER PETREY: Right. But I was just more  
19 focusing on the organic soybean marketing potential. To like  
20 annotate it somehow to say only organic soybeans are, or you  
21 need to source that, or however that is.

22 BOARD MEMBER D'AMORE: Could I step back in? Were  
23 you suggesting that hexane, itself, sort of messes up the, the  
24 process on that?

25 BOARD MEMBER PETREY: I was just wondering what, what

1 made the conventional lecithin more superior, because I think  
2 the comment that was made was that the organic form wasn't as  
3 viable as an option, if I heard that comment correctly.

4 BOARD MEMBER D'AMORE: Right. Well, let's backup on  
5 the hexane because the hexane's got its issues, but it isn't  
6 the issue that we're articulating right now, to what I see. I  
7 think what's being said, the alternative is the source  
8 alternative. It's the soybean.

9 BOARD MEMBER PETREY: The raw material, yes. Can we  
10 annotate it to say --

11 BOARD MEMBER D'AMORE: Just, just the raw material.  
12 Just that transition from mostly soy to, to sunflower is, is,  
13 in my eye, in my mind, what they're talking about. But already  
14 soy, and sunflower, and egg yolk have been identified as  
15 something that does work. They went outside of that and looked  
16 at other things that did not produce the quality that was  
17 necessary.

18 BOARD MEMBER PETREY: Okay, thank you.

19 BOARD MEMBER D'AMORE: Is that confusing you now?

20 BOARD MEMBER HUSEMAN: Yeah, sorry if I --

21 BOARD MEMBER D'AMORE: No, I -- hey, I told you I was  
22 nervous. I got up this morning and looked at some definitions.

23 BOARD MEMBER HUSEMAN: And I would -- I would not --  
24 I would not silo soybeans, specifically. I would put all oil  
25 seed products as potential --

1 BOARD MEMBER D'AMORE: Okay.

2 BOARD MEMBER HUSEMAN: -- sources. And, and then  
3 that leads into further discussion. But that also lends to  
4 product availability.

5 CHAIR POWELL-PALM: Question from Nate real quick?

6 BOARD MEMBER LEWIS: So, Kim, my reading of the TR,  
7 the hexane step in the process, the removal of the oil from the  
8 seed, itself, is not the insurmountable barrier to an organic  
9 lecithin.

10 BOARD MEMBER D'AMORE: Correct.

11 BOARD MEMBER LEWIS: It's the fractionation to get to  
12 the lecithin, which requires acetone. And the TR require -- or  
13 has said there are some alternatives. One is a membrane  
14 technology and the other is a super critical carbon dioxide  
15 extraction, which I'm super interested in, but a super critical  
16 CO2. But these are not -- these are not widespread or widely  
17 adopted. So I think there is an investment in technology step  
18 that hasn't really been embraced by the lecithin industry to  
19 prevent a -- which is preventing an organic -- a suitable  
20 organic alternative.

21 I also seem to recall that while there may be some  
22 organic lecithin on the market, there are some food safety  
23 concerns because that is manufactured overseas. And there's  
24 some incompatibility. That may have changed in the last few  
25 years. But I recall at the last sunset that there were some

1 food safety GNPs that were not -- or good manufacturing  
2 practices that were not being followed in the overseas  
3 facilities.

4 But I think it's that fractionation, that super  
5 critical or membrane technology that potentially could open the  
6 door.

7 CHAIR POWELL-PALM: Yeah, Kim and then Allison.

8 BOARD MEMBER HUSEMAN: Thank you, Nate. I think you  
9 really honed in on where I was trying to go with that. So  
10 capital investment and in the production facilities, and gosh  
11 if we could hear from a processor who might have this equipment  
12 installed in the U.S. that can speak to it would be really  
13 wonderful to hear from.

14 BOARD MEMBER D'AMORE: Agreed. Thank you.

15 CHAIR POWELL-PALM: Allison?

16 BOARD MEMBER JOHNSON: Thank you. I just wanted to  
17 reiterate Logan's suggestion. I think it's a really elegant  
18 way to start sort of thinking about commercial availability in  
19 a different way. Like not just is the final product available  
20 as organic, but is the raw ingredient available as organic,  
21 even if the output isn't. I guess that would have to be either  
22 an annotation, annotation change or some sort of direction to  
23 certifiers about what commercial availability means or is,  
24 probably messier. But I like the idea of trying to go in that  
25 direction so at least you're, you're getting at the raw



1 material. And the process may come along later to get it all  
2 the way to organic.

3 CHAIR POWELL-PALM: Logan, then Nate.

4 BOARD MEMBER PETREY: Question about the facility and  
5 the capital needed. Could you have organic runs in a currently  
6 conventional facility? Because like we do carrots that way.

7 BOARD MEMBER D'AMORE: Probably not.

8 BOARD MEMBER PETREY: No? It's too, too much.

9 BOARD MEMBER D'AMORE: Well, it would definitely have  
10 to go through a thorough cleaning process, which is so arduous.  
11 And most of the time they have a separate run for just the  
12 organic or conventional.

13 BOARD MEMBER PETREY: Separate in machinery? Is that  
14 what you mean?

15 BOARD MEMBER D'AMORE: Not the machinery type. Yeah,  
16 but -- excuse me, the whole line would have to be --

17 BOARD MEMBER PETREY: Would have to be designated?

18 BOARD MEMBER D'AMORE: Exactly.

19 BOARD MEMBER PETREY: You can't clean -- yeah, I mean  
20 obviously oil is a lot different. Okay.

21 BOARD MEMBER HUSEMAN: The only --

22 CHAIR POWELL-PALM: Go ahead, Kim, as the handler.

23 BOARD MEMBER HUSEMAN: Thank you, Nate. The only  
24 U.S. facilities that I have visited that are oil seed  
25 production facilities, that may have both a convention and an

1 organic production are two holistically separated -- the piping  
2 is different and it is very distinct. Now it can be housed  
3 right next to each other. And there's examples in the U.S. of  
4 that. But the production of organic soy-extracted, or  
5 sunflower-extracted, or any oil seed production is holistically  
6 a different process than conventional. And it's by the  
7 inclusion, those chemicals are not. Thank you.

8 CHAIR POWELL-PALM: Nate, Allison, Gerry.

9 BOARD MEMBER D'AMORE: I'm not going to question,  
10 myself. I'd like to follow-up, though.

11 CHAIR POWELL-PALM: Sure, go ahead, guys. I think  
12 everyone is following up to Kim.

13 BOARD MEMBER D'AMORE: Here's the pedantic side of  
14 me. You said the piping is different. I'm going to say that  
15 it isn't. It's another one. It's separated. There's not --  
16 you're not -- we're not driving a distinction in the process.  
17 We're driving a distinction in delivery and of an end product.  
18 Correct?

19 BOARD MEMBER HUSEMAN: The process is different. But  
20 to your -- yes, the, the pipes are the same that the product  
21 travels through, but they are -- they are separate.

22 BOARD MEMBER D'AMORE: Separated.

23 BOARD MEMBER HUSEMAN: You're not going to flush a  
24 chemical produced soy line, in my mind, and then run an organic  
25 version. The equipment to make a product is different.

1 CHAIR POWELL-PALM: Nate and then Allison.

2 BOARD MEMBER LEWIS: I, too, am intrigued by Logan's  
3 suggestion. And I think that what we would be talking about is  
4 a conventional facility buying some organic soybeans, and  
5 running it through a conventional process, and then making the  
6 exempt label claim of simply indicating organic soybeans on its  
7 label, which is an exempt claim. So it's a noncertified  
8 facility using an organic ingredient and making an exempt label  
9 claim.

10 We already have a precedent for that in livestock,  
11 vitamins, and minerals, which require any agricultural  
12 ingredient included in that three-pack to be organic. So  
13 organic livestock, vitamin, and mineral producers are not  
14 certified entities. But they are required to use an organic  
15 agricultural carrier if they do use one. And they make the  
16 exempt claim of simply identifying that agricultural ingredient  
17 as organic on their label.

18 So I think it's possible. And we certainly do  
19 require it for livestock, vitamins, and minerals. And in that  
20 way it's intriguing to me, this nudge towards at least buying  
21 Amy's beans, instead of Amy's neighbor's beans to make this,  
22 the oiled lecithin.

23 BOARD MEMBER HUSEMAN: Can I ask a clarifying  
24 question, Nate?

25 CHAIR POWELL-PALM: Mm-hmm. Go ahead.

1 BOARD MEMBER HUSEMAN: So if I hear you correctly,  
2 Nate Lewis, what you are saying is take an organic bean, run it  
3 through a conventional facility to be able to make lecithin.  
4 Do -- the, the economics behind that would be very hard for me  
5 to get behind.

6 BOARD MEMBER LEWIS: Yeah. I'm not -- I'm not at all  
7 indicating it is feasible from an economic or practical  
8 standpoint. But I think there is a -- there is an eye of the  
9 needle we could thread from a -- from the rules that would  
10 allow for that annotation.

11 CHAIR POWELL-PALM: Would the wine example be the  
12 better one to look towards, organic grapes, made with, yeah?

13 BOARD MEMBER D'AMORE: Well, no. Made with is a  
14 certified category, so this would be still in a noncertified  
15 plant. This is an exempt label claim.

16 BOARD MEMBER HUSEMAN: I simply think that there is  
17 enough organic oil sees in the marketplace to take an organic  
18 facility and making organic lecithin.

19 BOARD MEMBER D'AMORE: As long as we get super  
20 critical CO2.

21 CHAIR POWELL-PALM: Yeah. Allison?

22 BOARD MEMBER JOHNSON: Thank you. I was going to  
23 make the same point that, that Nate made. I think you could  
24 even -- it wouldn't even have to be labeled necessarily, but  
25 I'm imagining as a certifier you ask for the Big 3 affidavit,

1 non-GMO, non-radiated, no sludge. Was it made from organic  
2 soybeans? Yes. So it seems like it's possible, economics  
3 aside. And ultimately the goal we'd be working towards is  
4 getting an actual organic lecithin on the market. But it could  
5 be an interim step till we start building those markets for the  
6 organic soybeans.

7 CHAIR POWELL-PALM: Amy?

8 SECRETARY BRUCH: I really appreciate this  
9 discussion. I mean I think we've got to -- we've got to make  
10 some progress here. Source material, organic source material  
11 is available. And I think creativity and innovation is what we  
12 need to try to start building these markets, and build out  
13 organic. We're a \$70 billion business and we're growing pretty  
14 impressively, but we need to have additional innovation to grow  
15 exponentially now our, our area, instead of just straight line  
16 a few percent at a time. So I think I really appreciate this.  
17 Thanks.

18 CHAIR POWELL-PALM: Gerry?

19 BOARD MEMBER D'AMORE: Quick question, Amy. I agree  
20 with everything you said. Can we just put a bow around this  
21 one with the suggestion of agreeing with folks that at this  
22 particular point in time it may not be the opportune time to,  
23 to change the sunset.

24 SECRETARY BRUCH: Well, correct, because we need an  
25 annotation. So, yes, you are absolutely right.

1 BOARD MEMBER D'AMORE: Okay, thank you.

2 SECRETARY BRUCH: Thank you, Gerry.

3 CHAIR POWELL-PALM: All right. And with that we're  
4 going to go to the motion.

5 BOARD MEMBER SMITH: Okay. Great discussion, guys.  
6 We were getting into snoozefest over here, so this is really  
7 awesome. Okay. The motion to remove lecithin from the  
8 National List was motioned by Gerry and seconded by myself,  
9 Kyla.

10 CHAIR POWELL-PALM: And we're going to start with  
11 Dilip.

12 BOARD MEMBER NANDWANI: No.

13 CHAIR POWELL-PALM: Gerry?

14 BOARD MEMBER D'AMORE: No.

15 CHAIR POWELL-PALM: Kyla?

16 BOARD MEMBER SMITH: No.

17 CHAIR POWELL-PALM: Amy?

18 SECRETARY BRUCH: Yes.

19 CHAIR POWELL-PALM: Kim?

20 BOARD MEMBER HUSEMAN: Yes.

21 CHAIR POWELL-PALM: Franklin?

22 BOARD MEMBER QUARCOO: No.

23 CHAIR POWELL-PALM: Wood?

24 BOARD MEMBER TURNER: Yes.

25 CHAIR POWELL-PALM: Slow down here, folks. This is

1 the most exciting this whole meeting is going to get, so soak  
2 it in.

3 SECRETARY BRUCH: I can't do math that quick. I want  
4 to abstain.

5 BOARD MEMBER DIMITRI: No.

6 CHAIR POWELL-PALM: So I think right now we have  
7 three yesses. Okay.

8 SECRETARY BRUCH: Yes.

9 CHAIR POWELL-PALM: Carolyn? I'm sorry.

10 BOARD MEMBER DIMITRI: I said no.

11 CHAIR POWELL-PALM: Carolyn is a no. Allison?

12 CHAIR POWELL-PALM: Allison?

13 BOARD MEMBER JOHNSON: Yes.

14 CHAIR POWELL-PALM: So four yesses. Brian?

15 BOARD MEMBER CALDWELL: I'm going to abstain, because  
16 now I don't understand the different sides of this question.  
17 So I'm going to abstain.

18 CHAIR POWELL-PALM: Nate?

19 BOARD MEMBER LEWIS: No.

20 CHAIR POWELL-PALM: The Chair votes no.

21 BOARD MEMBER D'AMORE: Do you want to ask me again  
22 why I got up at 5:00 in the morning?

23 (Laughter.)

24 SECRETARY BRUCH: Four yes, seven no, two  
25 abstentions, zero recusals, two absent. The motion fails.

1 CHAIR POWELL-PALM: All right. Let's take a break,  
2 everybody.

3 (Off the record from 11:58 a.m. to 12:18 p.m.)

4 CHAIR POWELL-PALM: We're going to keep the same  
5 schedule for lunch. We're going to plan to go to lunch at  
6 1 o'clock, coming back at 2:15. After lunch, we're going to go  
7 through elections and then we'll move to other business.

8 Okay. With that, I'm going to head over to Wood,  
9 chair of Materials Subcommittee.

10 BOARD MEMBER TURNER: Thanks. Before we jump into  
11 research priorities discussion, I just wanted to flag a couple  
12 of things. And I appreciate Nate mentioning and it was  
13 mentioned earlier about what we're doing on excluded methods  
14 and the process of, of moving, moving towards using an updated  
15 TR template that allows us to ask these kinds of questions  
16 about excluded methods as we review materials. So we'll hear  
17 more about that as we continue on with the process. Many  
18 people have been tracking this. Know that Mindy has brought a  
19 lot of leadership to this and, and others have really supported  
20 that work. So thanks for mentioning that the way you did  
21 earlier, Nate.

22 Also, a reminder to folks that we have an exciting  
23 process in this subcommittee on inerts that will involve a  
24 small working group of folks, who will be tasked with moving  
25 that -- moving that work forward. It will live within this



1 subcommittee and updates will, will follow. So Nate will say a  
2 little bit more about that later in the day. But I just wanted  
3 to acknowledge that work and say to the folks that are involved  
4 in that work that I appreciate the leadership. Long overdue.

5           So with that let's moving into a discussion of  
6 research priorities. So I've been thinking a lot about  
7 something Franklin said about how we -- how we incentivize  
8 research into plastics. And it sort of triggered for me a lot  
9 of thoughts about this, what we've been doing over the last  
10 couple of years to try to, I think, lean into what research  
11 priorities actually mean, and what they mean for the community,  
12 and what signals they send, and all those -- all those issues  
13 that we've talked about before.

14           And it's interesting, because I think I, I came into  
15 this thinking it needs to be an exhaustive list of research  
16 priorities like the one -- like the ones that we have. I think  
17 it's getting the list gets longer and longer. And as I go into  
18 this document and this is not me trying to derail us moving  
19 forward with this document, but I -- but I do want to challenge  
20 us as we move into the year ahead to think about whether the  
21 list needs to be shorter. Are there some -- are there some  
22 research priorities that are really fundamental to what we do.

23           I mean it comes up over and over again in the  
24 comments, people want more research on plastics. Like it needs  
25 to -- when it's on a list that's as long as ours is, there's a

1 lot of directions that different researchers could pursue in  
2 terms of their own -- their own -- some narrow element that --  
3 I mean I'm not saying those aren't important directions, but  
4 something that might not be as high priority for, for the  
5 direction that we want to see organic go as say plastics or any  
6 number of issues.

7           So I don't know what others think about that. But I,  
8 I just, you know, we can certainly talk about it. I, I do  
9 wonder if this list of priorities should be something just we  
10 only want to -- we only want to recommend research in these 5  
11 or 10 areas and just ensure that it gets done. And I'm really  
12 thankful to Franklin for mentioning that, making that comment.  
13 How do we incentivize the work? How do we incentivize the work  
14 that needs to happen? We probably shorten the list. So anyway  
15 for --

16           CHAIR POWELL-PALM: I was just going to click through  
17 that real quick, just to sort of get an idea of where we're --  
18 what we're looking at, whatever direction you want to go.

19           BOARD MEMBER TURNER: Yeah, sure. No, that's fine.  
20 And so I just wanted to -- I think we have a -- I just wanted  
21 to elevate some comments and I appreciate the continued  
22 comments we get from the community. I want to remind the  
23 community that by the time we get to this meeting, we're really  
24 not -- there's not an opportunity, obviously, at this meeting  
25 to add some new research priorities.

1           But all the comments that we received in this last  
2 round certainly tee up this ongoing conversation. So as we  
3 move into these discussions for next year, all the things that  
4 came forward from, from the community will certainly be part of  
5 that consideration. But I also want to suggest that maybe  
6 it's, it's not -- it's not adding to the list as we move  
7 forward, it's getting shorter.

8           So, again, so many comments from different groups on  
9 ensuring that we're elevating the work on, on plastics. I  
10 think there's, there's discussions about or some suggestions of  
11 other -- of research priorities. We heard from one commenter  
12 who said we need to be doing these need for updates more  
13 regularly so that we understand for the feedback groups how  
14 this research is going to be used and sort of what's going on  
15 there. I think that's really important as well.

16           Great feedback about how to really add more  
17 specificity, in some cases, to research priorities around  
18 racial equity and inclusivity, for example. I thought some of  
19 the -- some of the feedback we heard was, was really good  
20 there.

21           Continued interest in this -- in the issue of  
22 sanitizers, and I thought we've heard it over and over again  
23 over the last several days. I mean we don't have a -- we don't  
24 have a new -- we don't have a different process for evaluating  
25 sanitizers. We still don't have that process. What does that

1 look like? How do we drive research into this? These are  
2 issues that I think we all kind of realize these are sort of  
3 imperfect materials that we have to sort of continue to keep on  
4 the list and sort of move forward. But there's got to be some  
5 other way of thinking about this.

6 Obviously, the plastics issue extends over into  
7 peapots (ph.) issues, which we've talked about over and over  
8 again. So understanding what's going on here more and more.  
9 I'm just trying to flag some other issues that, that came up.  
10 One issue, one group said, hey, can you guys clarify what's  
11 going on in the annotation process. I think we've all talked  
12 about that. I think we're going to spend some time today  
13 talking about that, which will be great.

14 Also, continued interest and concern about pork  
15 research and more comments on poultry research. I'm excited  
16 about the news that we announced this week, but still  
17 interested in that issue.

18 Interest in copper. I want to elevate for people  
19 again that there seems to be some belief somehow in comments  
20 that we're not wanting research into copper sulfate. That's  
21 not the case. We've tried to -- we've tried to outline very  
22 clearly that we want comprehensive research into copper, copper  
23 products, and even specifically mentioning rice applications.  
24 So I just want to make that -- I want to make that clear,  
25 again, that that's not -- we haven't excluded that research

1 priority. We've actually tried to articulate a broader  
2 interest in, in all copper -- in all copper usage. And a real  
3 need for that research moving forward.

4 Brian, I'm going to ask you if you -- if there is  
5 anything as a liaison to a couple of these subcommittees that  
6 you wanted to add to, to kind of overview? Is there anything  
7 that you saw in the comments that was interesting to you  
8 relative to what we've done this term?

9 BOARD MEMBER CALDWELL: Yeah, thanks, Wood. And I  
10 think I just wanted to, to basically say again that we take the  
11 comments very seriously and we incorporated almost all of the  
12 suggestions from the comments into the, the latest version of  
13 the research priorities, which does make it longer but makes it  
14 better. So, so there we go.

15 A couple of thoughts I had. There's I think in some  
16 of the cases of our -- of our listing, research has been done.  
17 Significant research has been done on the topics that we're  
18 asking for. But we may not be aware of it and the community at  
19 large may not be very aware of it. And I haven't run this by  
20 anybody who can say anything about it, yet, but I'm hoping that  
21 maybe our, our new technical specialist can, can do some  
22 targeted literature reviews at some point on some of these  
23 specific items. And then they may fall off the list, because  
24 we may know how to -- how to handle some of these questions  
25 that we don't think we know the answers to. So that would be a

1 wonderful service.

2           And the other part of it is how do we -- how do we in  
3 general terms make sure that the, the information from the  
4 researchers gets out to the broader community. And our  
5 extension system isn't as -- isn't as robust as it once was.  
6 And so there are -- there are some issues there. eOrganic was  
7 promoted for quite a while and still, as I understand it,  
8 exists. Maybe we can breathe some life into that.

9           But I think this, you know, again any, any input that  
10 we can get from you all as to how we can make sure that those  
11 conduits are open, the researchers need to share what they --  
12 what they learn with the community. It would be very helpful.  
13 So, yeah, thanks, Wood.

14           BOARD MEMBER TURNER: Thanks, Brian. The discussion  
15 that --

16           CHAIR POWELL-PALM: Nice chats, yeah. Other thoughts  
17 on this before I just turn it over to Carolyn as the academic  
18 who needs to guide us how we get more engagement.

19           BOARD MEMBER DIMITRI: I guess it was really helpful  
20 when we had Reece come and give that presentation at the last  
21 board meeting or at the one in Sacramento. But I was thinking  
22 about this list here. And we have these two new, wonderful  
23 humans who are going to help us. And I wonder if like what we  
24 should do is go through here and prioritize like how we --  
25 which ones we think it would be great for them to even just

1 take like an initial pass at. And then we could say -- they  
2 could look and see, yeah, there's a lot on this and there's a  
3 lot on that, so it could be an iterative process. I think that  
4 would be helpful.

5 But I do think this is like a classic problem of like  
6 getting academic research out to not to farmers, but also to  
7 people who are interested in policy and advocacy. And I don't  
8 know like the best solution. I mean usually there are kind of  
9 boring solutions, like have a four-day conference or something  
10 like that. And I don't -- I don't know the best way forward  
11 with this. I think Brian and I have talked about this  
12 extensively, like how do you find out what people are doing.

13 CHAIR POWELL-PALM: Dilip, then Allison.

14 BOARD MEMBER NANDWANI: I don't know if there is  
15 another slide which had more items, Wood? I see next slide  
16 icon on my phone. So one of the topic thing I mentioned, I'm  
17 not sure it's on the list or we talked about on, on any food.  
18 There is a lot of debate and I don't want to say it's a  
19 disagreement in the U.S. and Europe in research, but is it that  
20 organic food is safer, it's nutritious, and all that. So we  
21 have these two wonderful, as Carolyn said, food technology  
22 standard person today also, if you can add something about to  
23 do some literature and present a bit of information in that  
24 respect to whether organic varied stance really -- is really  
25 more nutritious or that conventional also helps. So I just

1 want to draw there if that's something sounds good to the  
2 committee and as a group. Thank you.

3 CHAIR POWELL-PALM: Logan -- or, sorry, Allison, did  
4 you have some? And then Logan and then Amy.

5 BOARD MEMBER JOHNSON: Thank you. I was just trying  
6 to furiously search to see if I could answer my own question.  
7 But can you remind me who we present these recommendations to?  
8 And then my suggestion for feedback, we're continuing to load  
9 our agenda with fun things and interesting things that we could  
10 do, but one feedback would be we give it to them in the fall.  
11 They come back to us the next fall and tell us what has been  
12 done or have some sort of back and forth, rather than a one-way  
13 recommendation, if there is a they who actually could do that  
14 for us.

15 And then I just wanted to respond to the idea about  
16 prioritization. I do think there is some value in having a  
17 laundry list, one, to help us keep track of things and, two, to  
18 show the breadth of issues that really do need to be taken on  
19 in organic. So maybe like an in between solution could be have  
20 the laundry list, but then offer a prioritization, like these  
21 are the top three things that we think are crucial to focus on  
22 or something like that, so we don't lose the big picture, but  
23 we can also provide some distillation.

24 BOARD MEMBER TURNER: That's great, yeah. It goes to  
25 NIFA. Matt at NIFA is the person that we -- who leads that,



1 leads this process. And we've had him come to speak to the  
2 Board in the past. I don't know if you were on or not. But  
3 about this exact -- this exact issue of sort of feedback, sort  
4 of where, where and how this research is finding -- these  
5 priorities are finding researchers and leading to real  
6 knowledge building. He, he reinforced for us that these --  
7 that these are -- this is a powerful process for them on some  
8 level in terms of sort of sending a signal to the community  
9 that these are topics that matter.

10 CHAIR POWELL-PALM: Logan?

11 BOARD MEMBER PETREY: Yeah. Actually, I had the same  
12 question and comment that Allison did. But the they, to me,  
13 was universities and didn't know if we could directly  
14 communicate with the universities and say this is organic  
15 interest. And if you're conducting -- I don't know if we can  
16 go around NIFA or how -- or how that works politically, but to  
17 do that. And then I think that's a great suggestion is to  
18 follow-up, you know, can we have your results after you're  
19 done. Anyway --

20 BOARD MEMBER TURNER: Yeah, I'll defer to the  
21 academics on the Board about that process. But I, I don't  
22 think there is anything we can do to get the word out about  
23 these, these priorities is key. I mean I think it's a fairly  
24 passive process for us to just send the -- send the priorities  
25 over to NIFA and say do something with it. So, Brian?

1           BOARD MEMBER CALDWELL: Well, along those lines, in  
2 the -- in the -- I mean I'm retired for a little while, so I'm  
3 a little out of date. But in the OREI projects that we worked  
4 on, if you could -- if you could point to one of these  
5 priorities as being accomplished or being worked on with your  
6 project, that was a plus, definitely a plus. But on the other  
7 hand, there was -- there was the -- their high priority request  
8 definitely did not necessarily mirror what, what these research  
9 priorities were.

10           CHAIR POWELL-PALM: Amy?

11           SECRETARY BRUCH: Yeah, Brian, you speak a lot more  
12 eloquently than I'm going to. But I do agree with a lot of  
13 points being said here. One thing, I did a little background  
14 research thanks to my buddy Allison. She has a lot of  
15 information on the Farm Bill and summaries of the Farm Bill in  
16 her position. And it seems like 1/10th of 1 percent of the --  
17 of the Farm Bill goes to organic funding. Majority of that  
18 funding goes to research.

19           So I think there is a big opportunity here. We have  
20 a lot of feedback from the community and have comment process.  
21 We have this list generated by stakeholder feedback, our own  
22 feedback. We need to be able to insert ourselves somewhat more  
23 in this process. I mean if these are our priorities and these  
24 are not aligning with groups receiving the money, we need to  
25 either get educated on what those additional priorities are.

1 I, I think in a previous meeting we were told even prioritizing  
2 or ranking, shortening this list probably isn't the best  
3 thought. I think the comment was just get as many things on  
4 there. Maybe that was for the point maybe something will match  
5 up here, I don't know.

6 But I think there is a big opportunity here. A lot  
7 of money is going to research. Most of the groups that  
8 represent organics on the Hill are asking for more money for  
9 research. As a farmer, like you said, Brian, I don't know  
10 where to go to get this information. I do my own real farm  
11 research and share it amongst our communities for ag projects.

12 So I think there is just a big opportunity. And to  
13 understand, I mean, fiscal responsibility, return on  
14 investment, where is this going, what's happening, how are we  
15 moving the needle forward I think are really important  
16 questions. We need to be good stewards of this money. We need  
17 to take our industry somewhere where, you know, somewhere just  
18 increasing, continuous improvement every year.

19 So I really -- this concerns me a little bit, this  
20 process, just not being able to feel like we're moving the  
21 needle. So, yeah, maybe, maybe if we could get more feedback,  
22 generate this solution loop, I would feel a lot more  
23 comfortable. But I think there is a lot of challenges to  
24 solve, a lot of smart people in our industry, and I'd love to  
25 start crossing these things off the list because there is more

1 to add, add to the list.

2 CHAIR POWELL-PALM: Amen.

3 SECRETARY BRUCH: Sorry.

4 CHAIR POWELL-PALM: Carolyn.

5 BOARD MEMBER DIMITRI: So I currently have an  
6 OREI-funded project. And the goal is to develop an applied  
7 economic research and outreach agenda. And so we're coming up  
8 into our final year. We've collected data. We've talked to  
9 many people in this room. And I'm planning to hold many  
10 meetings with people who do research, so the USDA researchers,  
11 the people at NIFA who fund. I plan to write articles. I'll  
12 go to conferences where there are other, other economists, to  
13 try to talk about these are really important questions.

14 So I think for us, with this list we need to take --  
15 well, we don't need to. But one approach could be to take a  
16 similar form of outreach. But I see like it's a lot of work to  
17 take this list and turn it into -- break it down by discipline  
18 and go to, say like Franklin goes to the meetings. I don't  
19 know if Franklin goes to like those science meetings with, I  
20 don't know, AAAS or something like that, to make a presentation  
21 there about here are the priorities that we see in this field.

22 So I think it's like getting the word out to the  
23 people who do research that telling NIFA is helpful, but it  
24 doesn't really -- like I don't, when I'm putting in a grant  
25 proposal, I kind of look for what Brian said, is it a priority.

1 But I just do what I think is important. So I think it's how  
2 do we convince researchers that this is important. So, anyway,  
3 that's my two cents.

4 CHAIR POWELL-PALM: Sure. Let's go Franklin, then  
5 Amy -- go ahead, Wood.

6 BOARD MEMBER TURNER: I just -- I appreciate what  
7 you're saying, Carolyn, and I also worry a little bit, too, I  
8 think about the role of the stakeholders in this, our, our  
9 community here and pushing out these priorities, because I  
10 think it's a challenging -- it's a challenging process. But  
11 there's all those stakeholders, as I just mentioned in the  
12 beginning, have -- they have general support for our  
13 priorities, but then they have other things. And those aren't  
14 necessarily going -- don't always make it onto the list on our  
15 cycle every year.

16 And so, yeah, if we could all align in each cycle as  
17 a community and pushing out the same priorities to everybody  
18 that we could find and not -- and not saying these other  
19 priorities that maybe haven't made it onto the list yet, but  
20 maybe will at some point, you know, and could be fundable in  
21 the future, that we hold off on those for the time being. I  
22 don't -- I don't know how to say that exactly without sounding  
23 like I'm stepping on toes. But we all need to align on what  
24 the priorities stand for and push them out together. I don't  
25 mean just the Board. I mean the whole community.

1 CHAIR POWELL-PALM: Franklin.

2 BOARD MEMBER QUARCOO: I want to go in a slightly  
3 different direction. The conventional type companies do a lot  
4 of funding for conventional agriculture. I'm thinking organic  
5 type industries or big manufacturers should contribute a little  
6 bit more to research in universities. Federal funding is  
7 great. It does the -- for one thing, you have a three year or  
8 five year grant. You have built this momentum to students,  
9 post docs, everybody is happy, collect this data. The grant  
10 comes to an end. Everything comes to an end. Breaks the  
11 momentum.

12 You may not get the next grant you apply for. It's  
13 not guarantee. So it's a start, stop, you lose momentum, you  
14 start. If there is private sector support for universities,  
15 for one thing there is more latitude and flexibility to do  
16 things. A new research topic comes up. You don't want -- you  
17 don't have to wait for the next RFE. Endowments, just anything  
18 that is flexible so when a research topic shows up on this, our  
19 priority list, somebody can quickly do that without waiting for  
20 the next RFE, that at the very least they can get preliminary  
21 data that can help them apply for a much larger grant with the  
22 federal government. But we'll be more nimble. We'll be able  
23 to address.

24 So I think this is sort of a callout, a call to  
25 private sector per station, organic -- in the organic for

1 research. We will generate information that goes to promote  
2 what we're doing. Flexibility in all of this will help.

3 CHAIR POWELL-PALM: Amy, then Wood.

4 SECRETARY BRUCH: Franklin, that was a strong point.  
5 I agree with you completely. Carolyn, I have a question to  
6 you, okay, so be ready. All right. You said you were a  
7 recipient of a grant. You're currently working on it. What in  
8 this grant, and I apologize I don't know, are there  
9 deliverables, or reporting, or a feedback loop that you have to  
10 provide for how you use the dollars and what the result was?

11 BOARD MEMBER DIMITRI: Yeah. So every year, you have  
12 to report, give like an update report of what you've done in  
13 that year. And then there will be a final project report that  
14 we make to NIFA. But then there are, are publications. And so  
15 we have -- like we'll have this -- we have a -- we partner with  
16 NCAD on this, who does our outreach. So we would do podcasts,  
17 webinars. And then we'll have like a written report type of  
18 thing that will be on their website. And then as I said, I'll  
19 try to make -- I'll go to every single person who will talk to  
20 me about this and give like an oral presentation. And then  
21 peer review publications.

22 SECRETARY BRUCH: And just to follow-up, that sounds  
23 like you're going above and beyond. So all of the, the  
24 podcasts, going to every single person, is that unique to you  
25 and your style or are you seeing that amongst other researchers

1 as well?

2 BOARD MEMBER DIMITRI: So it depends on the work that  
3 you do. Michelle told me not to touch that, so now I see why.  
4 I, I -- like my goal is to create a -- okay, so I think there  
5 is not enough research on post-farm market activities for the  
6 organic sector. And I don't think there is enough research on  
7 risk management for the organic sector. So these are common  
8 areas of research that economists do.

9 So I thought, well, if I can tell the research world  
10 that these are important issues and there is no one else who is  
11 going to be able to do it, because I've spent my whole life, my  
12 whole career looking at post-farm organic marketing and the  
13 post-farm system. So it was like a personal agenda that I was  
14 just -- I just thought like it's time, people, can't you see  
15 how this is important.

16 So the purpose of his project was actually to develop  
17 a research agenda, as opposed to understand say like the impact  
18 of climate on farm risk and what that might mean for crop  
19 insurance. So that would have like a different set of output.  
20 So this just by design, I have to do a lot of output, outreach  
21 to other people to try to stir up interest in understanding the  
22 economics. Sustainability for organic farms is extremely  
23 important. And if you don't really look post-farm, then you  
24 are not really supporting the economic sustainability.

25 So it's more of like a push to, yeah, we have --



1 looking at pest control is important and looking at weed  
2 management is important. But if you can't sell your product  
3 then what good are you as a farm. Like how long are you going  
4 to stay in business. So I think it's just specific to this  
5 type of project.

6 CHAIR POWELL-PALM: We're going to go Wood, then  
7 Nate, then Dilip.

8 BOARD MEMBER TURNER: I appreciate the comment from  
9 Franklin and from Carolyn. But I also want to say -- and I do  
10 think the role of the private sector in stimulating some of  
11 these -- some of this research is important. But there is  
12 nothing more important -- we all know you can smell  
13 industry-funded research a mile away. And we are good at that.  
14 So it's really, really important to have this kind of funded  
15 research, government-funded research to really bolster these  
16 topics and help support the growth of these markets, because  
17 that's, that's the heart of the matter.

18 So I totally get the point. But I -- but I also feel  
19 like I can't overstate the importance of to the industry as a  
20 whole in really advancing these with federal funds.

21 CHAIR POWELL-PALM: Nate?

22 BOARD MEMBER LEWIS: I'm trying to collect my  
23 thoughts. But also in reaction to Franklin's comment about  
24 endowments in particular, I know Clif Bar provided a \$1 million  
25 endowment to Tuskegee. And I'm just sort of curious if there

1 is a role for the Board to play in sort of telling the story on  
2 how private investment can -- what, what private investment  
3 does.

4 I'm sort of intrigued by just the concept of  
5 storytelling in general and how much this Board can engage in  
6 that to showcase to the industry how to participate in a  
7 meaningful way. So I don't know, it's a little bit of a  
8 nascent thought. But I'm intrigued by that idea, as opposed to  
9 very sort of like technical and granular topics for programs.  
10 And I think our Board is accustomed to that type of activity,  
11 but I'm hoping to encourage us to think about how we can branch  
12 out more into the storytelling and to sort of highlight  
13 successes, and invite the industry to participate in a  
14 meaningful way. So --

15 CHAIR POWELL-PALM: Let's go Dilip and then Carolyn.

16 BOARD MEMBER NANDWANI: Thanks, Nate. I want to add  
17 to what Carolyn and in response to a discussion, and wanted to  
18 add first about the approval of these grant proposals, when  
19 researchers and others, they submit to the funding agency from  
20 as a nationwide. For confidentiality, I won't say the name of  
21 the agency, because that's how we do. But there is a Ngouajio  
22 review, grant review panel, and I have served on that. And I'm  
23 sure others have served.

24 From the organic research standpoint, 10 percent of  
25 those submitted, I don't know you heard, met Ngouajio. And I

1 know he mentioned this so I can quote him. 102 proposals were  
2 submitted I think 3 years back and only 10 or 12 were funded.  
3 So the proposals, they go to where they get responses. And the  
4 panel is experts. There are experts in organic agriculture  
5 nationwide. So they go through each nitty-gritty and each  
6 aspect, and the top 10 organic proposals are accepted.

7           Now second point, each grant proposal, they have a  
8 very also huge farm net and there is one point without that it  
9 cannot be accepted. That is a stakeholder advisory committee.  
10 So those proposals have to be based on the stakeholders,  
11 basically the farmers and the stake leads, they have to  
12 incorporate into those proposals. After the approval, then  
13 task -- the real task begin with the researchers and the PIs,  
14 that they have to deliver these, all those listed items, as  
15 well as the feedback every 3 months quarterly from the  
16 stakeholder advisory committee. And that sounds very vigorous,  
17 because we all are going through with that. And if there is  
18 anything that is lacking, they have to go back and suggest, and  
19 we -- all of the experts.

20           One point also I want to make about there are several  
21 center of excellence recently we have seen from funding  
22 agencies. I have yet to see a center of excellence proposal in  
23 organic agriculture in the nation. We don't have that yet.  
24 And that's something we can add, include that, or we cannot ask  
25 to Nate, also, and I'm sure he will be happy to look into that,

1 also.

2           Just while discussing this thought came to my mind  
3 and I thought we could have probably a center of excellence in  
4 organic. And that is a long-term funding. Like we are saying  
5 3 to 5 years. It could be 5 to 10 years. And in that they can  
6 have year-wise three years more, those projects, which can  
7 target all of these research priorities which we are discussing  
8 here. And that can cover what we are here on the annual basis  
9 we are soliciting. I just wanted to add that. Thank you.

10           CHAIR POWELL-PALM: Let's go Carolyn and then  
11 Franklin.

12           BOARD MEMBER DIMITRI: Okay. I'll try to be very  
13 brief here. I think as Dilip said, all of these grants are  
14 reviewed -- grant proposals are reviewed by panels. And I've  
15 sat on the OREI panel. They do the organic grants. There are  
16 some industry people in this room, I won't look at them, that  
17 have sat on panels with me. It's all confidential. And so  
18 every one of these panels has farmer representatives and they  
19 have representatives from different parts of the organic  
20 sector. It's not just academics.

21           So I would encourage you or anyone that's interested,  
22 maybe this is something people on the Board want to do when  
23 they rotate off the Board, is to participate on these  
24 particular panels. It's really fun and interesting to see what  
25 people are working on.

1           And then the other comment, I just wanted to echo  
2 what Wood said about industry-funded money. I mean one of my  
3 colleagues is Marion Nestle and so we're like all we do not  
4 take industry-funded money in my department under any  
5 circumstances, not even for a lunch. Anyway, thanks.

6           BOARD MEMBER QUARCOO: Okay. So that, that's one of  
7 the things. So with 10 out of 102, there are a lot of  
8 proposals, very good proposals that don't get funded. So if  
9 you look at that number, it's just a panel that sits and say,  
10 okay, these are the 10 best proposal. It's very frustrating.  
11 If we put together a proposal, it's a lot of work. And then  
12 nothing.

13           So I'm just saying, and we take -- my, we take money  
14 from industry. Just there is an agreement to sign. I've done  
15 it a number of times. If you ask me to test a product and I  
16 tell you have to sign something that says even if your product  
17 is not good, I still reserve the right to report that it's not  
18 good. So I can still maintain my credibility, even though I'm  
19 working with. And if you do not agree to sign that, then I  
20 take it that is not worth my time to conduct this research.

21           But what I'm saying is that that number 10 that I  
22 mentioned out of 102, it's not unique. It happens often.  
23 That's a few people get it. We have to increase federal  
24 funding, it's important. But we have to have other avenues for  
25 a long list of people who have great ideas are ready to work,

1 but not funding. And then some of this external funding or  
2 private funding also introduces a lot of flexibility in what  
3 can be done with, with the funds. Thank you.

4 CHAIR POWELL-PALM: Thank you. Thank you, both,  
5 Dilip, and Franklin, and Carolyn. We really appreciate a  
6 scientist voice. Allison?

7 BOARD MEMBER JOHNSON: Just to underscore Franklin's  
8 and Dilip's points, I did some research into whether we could  
9 create an organic center of excellence, and did some outreach  
10 to a number of historically black colleges and universities.  
11 And the number one thing that I heard is we're so  
12 under-resourced, like to have the capacity to apply for money,  
13 to have enough money to apply for money is the number one  
14 struggle.

15 So any, any source of funding is crucial. And it's  
16 really this sort of self-perpetuating cycle that a lot of  
17 universities are stuck in where they are under-resourced and  
18 that makes it harder to get the resources. So larger  
19 institutions have access to funding.

20 So the more ways that we can find to carve out  
21 funding streams, create like research criteria that will help  
22 funnel resources to those institutions that are not getting the  
23 resources they need to just do the work to begin with, much  
24 less grow a new big program that's focused on organic is step  
25 number one in my mind.

1 CHAIR POWELL-PALM: Thank you for that, yes. Dilip?

2 BOARD MEMBER NANDWANI: I'll just quickly add this  
3 comment. Last couple of years, I'd like to thank Fredrick  
4 Gorman (ph.) and national organic program. They have released  
5 huge, huge funding, \$100 billion and I heard \$300 million in  
6 other programs. And at least I am all well with these grants,  
7 six grants and lot of funding. So at this point, I am going to  
8 be onwards very careful applying for the new grants. Rather, I  
9 would seek any research priority which is very organic, for  
10 example, center of excellence is coming, maybe I will look in  
11 to that. Otherwise, I think I am good for funding. We have  
12 enough and I don't need anymore funding.

13 CHAIR POWELL-PALM: That is the first time a  
14 scientist has ever said those words. Mark it down, folks.  
15 We're coming up on lunch. I've been thinking, I, I had a very  
16 brief career in academia and was always -- I felt like this is  
17 always a struggle for me as a farmer, when I knew the issues  
18 that I wanted to address. I've seen them addressed on farms,  
19 figured out on farms. And so that's the -- going back to  
20 trying to prove it out in a way that was consistent with the  
21 scientific process was always a point of frustration, which is  
22 why I am not an academic.

23 But I think when we look through these research  
24 priorities, I, I just get a sense of a transfer from  
25 conventional thinking where we're always looking at a supply

1 side problem. That we want producers to produce more, more  
2 cheaply, with fewer resources, as opposed to saying, and this  
3 is why I am just so grateful that Carolyn is on this Board,  
4 saying we don't just have to look to the farmer to fix these  
5 problems.

6           When we say there is not enough money in organic  
7 milk, we don't need to think produce more organic milk for  
8 cheap. That's a conventional solution. If we say we can just  
9 figure out how to derive and drive more revenue to those farms,  
10 producing less is not an issue. And so it's a choice we each  
11 have to make of how do we contextualize these requests for  
12 research.

13           And so as I go down the line stuff list, I had a few  
14 of my colleagues on the Board, and I, when the Ukraine War was  
15 breaking out, I will see invasion by Russia of Ukraine was  
16 breaking out. There was a ton of energy behind how do we deal  
17 with the supply chain problems. What are we looking at for  
18 addressing high dairy feed prices and chicken feed prices. And  
19 so when we reached out to several researchers who are in the  
20 poultry nutrition space, they asked what do we think of ham.

21           And I love the curiosity, but I also feel like there  
22 is a gap in what we have right now and what we have in our  
23 toolbox. And I think Amy was always bringing this to the floor  
24 and saying I raise soybeans, I raise corn, we can raise yellow  
25 peas, we can raise all these things now. We don't need to



1 figure out how to research the agronomy of a new crop. We need  
2 to figure out how to better use what we already have.

3 So as we go through these different things, I want us  
4 to always try to hopefully check our mindset for are we asking  
5 -- do we have proof that what we're asking for is a deliverable  
6 the farmers or anyone else in the supply chain actually needs.  
7 Or do we have proof that it would be something that would move  
8 the needle.

9 And I think I was -- I was so grateful to see us  
10 actually take quite a few things off this list that have been  
11 there for a really long time. And when we talked about it, I  
12 think a lot of us couldn't really identify who this would  
13 benefit. It's more theoretical. The idea of developing a cow  
14 bread that is more suitable to organic dairy production is  
15 really not our issue right now. We can produce plenty of milk.  
16 And if we hear from farmers, we're producing too much mil to  
17 match the market right now.

18 So thinking about how do we really identify what's  
19 going to move the needle and then get the word out there. To  
20 Carolyn's point and I think to a lot of different commenters'  
21 points, the communication side of academia is chronically the  
22 worst part. That there is all this great research out there,  
23 but there is not a good pipeline to celebrate it and to get it  
24 into the hands of the folks that need it.

25 And so I think similar to why is organic so great, it

1 is a parallel path for that communication to what research do  
2 we actually need that's going to move the needle. And so I  
3 want to thank Wood as we -- as we look to going to the vote  
4 here. For all the really intentional questions that we've  
5 asked for how do we use this, well, Michelle sent us recently a  
6 reminder of the OREI grants that were given out. And I quickly  
7 put them side by side with our research priorities and I saw  
8 almost no Venn diagram. It was two different camps of things we  
9 didn't really ask for that were funded.

10           And so we're doing something wrong if we're not able  
11 to pull those researchers in and have them understand or have  
12 us understand what they are interested in doing. Pulling the  
13 labs in, understand their focus, and then saying, okay, we can  
14 work together and we can have a little bit of crossover here.

15           So as we look to the next rotation, I would love for  
16 the community to help us rank these priorities or come up with  
17 better priorities, and look at what do we actually need to do,  
18 give us some numbers for what you think if we solve X problem,  
19 the good that would come from it. And I think that's going to  
20 make communicating it a lot easier. And, heck, if we don't get  
21 federal funding, then private funding.

22           But I do want to elevate what Wood said in that  
23 organic is such a special place because it is owned by the  
24 public. And I love the idea of us pushing for more federal  
25 funding, easier access to federal funding, because it keeps it

1 in that same ethos, that this is a public good we're creating.  
2 We're not just creating research for private dollars.

3 No applause necessary. I was just -- I just really  
4 appreciate how much we have given to this thinking. And I  
5 think it's evolved quite a bit since, since I first came on the  
6 Board. So many thanks to everyone. Dilip, did you have  
7 something?

8 BOARD MEMBER NANDWANI: Sorry. Normally, I don't  
9 talk much. But I just realized that one of the stakeholder  
10 recently mentioned and I thought I will share here. What you  
11 mentioned, excellent, excellent. I'd like to applaud on that  
12 also, like others. But one of the area which is organic  
13 breeding, I think other day I mentioned from 2001 and 2023, we  
14 have come long way. We have organic seeds in almost lot of  
15 crops what we need, but still probably some of the crops doing  
16 seeds are not available with the stakeholders farm as they  
17 need. Maybe in wild crops or some, some other crops.

18 So we know that. And we heard Organic Farming  
19 Research Foundation where last year our top challenges in  
20 organic farming, and top one we all know that weeds,  
21 insect-based and disease, those are the top two challenges. Do  
22 we have -- I don't know where we can fit, fit into this  
23 priority, Wood, or maybe Franklin, you can help here, to  
24 produce disease-resistant or weed-resistant tolerant,  
25 insect-based resistant crops, grow -- genetic engineering is

1 prohibited below that. And how they are -- I don't want to say  
2 successful, but how they got attention, because they had this  
3 chain of insect-based resistant crops.

4 We have that here. And I remember now Albert Hubbard  
5 (ph.) what he mentioned that to make your plants so strong that  
6 the insect-based and disease, they won't attack. And one of  
7 the technique or tool we have to breeding, and I don't see a  
8 lot of research being done. Serving on a lot of these panels,  
9 again being confidentially, and Carolyn, she was also part of  
10 this panel, you don't see a lot of research in breeding in  
11 organic agriculture research.

12 So I just want to throw out there that one of that  
13 area where we can probably put somewhere in this list to focus  
14 on organic breeding to maybe organic seeds or have these  
15 insect-based disease and beetles in plants in future. Thank  
16 you.

17 CHAIR POWELL-PALM: I couldn't agree more. A quick  
18 anecdote before we, we break. But we had fabulous moisture in  
19 Montana this year, really good crop growing conditions. And  
20 conventionally we were getting like 110 bushels, which is dry  
21 land, no irrigation, which is really banging. And we really  
22 hit a ceiling in organic, still around 40 bushels, even though  
23 we had all the water which is normally our limiting ingredient.

24 And several buyers, who are very much in the space  
25 trying to promote organics, lamented that the breeding, and

1 this is not news to anyone, but the breeding of weeds is really  
2 oriented towards being a kind of a soft crop. That it wants  
3 that fertility right there. It's not going to look very hard.  
4 It doesn't want to forage, to hunt for nitrogen. And they just  
5 -- they lamented that they don't feel like there would ever be  
6 enough money in organic to incentivize breeding really strong  
7 varieties that could perform, maybe not to 110 bushels but to a  
8 better maximum.

9           And I want to tell them that that's not true. I want  
10 to go back to my people and say that there is a path forward  
11 for getting good breeding out there in organic seeds. And so I  
12 put it to the community to help us ideate on how we identify  
13 that funding, how we identify the right scientist, and how we  
14 build those relationships. Nate, please go ahead.

15           BOARD MEMBER LEWIS: What was the protein, though, on  
16 that.

17           CHAIR POWELL-PALM: It was lower. But, but even with  
18 -- that's a very good point. With conventional, you can pour  
19 on hundreds of pounds of nitrogen and keep that protein fairly  
20 stable where it's still hitting those premium markets. Winter  
21 wheat would have been down. And this is so in the weeds,  
22 folks, I'm so sorry. But winter wheat a little bit lower. But  
23 functionally they're able to capture both the value for the  
24 bushels and the quality. That's something that we can hope  
25 for, for organic. Because if we are getting those yields,

1 again I think we think about our goalpost, when an organic farm  
2 is producing 110 bushels in optimum circumstances, we will  
3 probably see lower prices on the shelf. That this will be  
4 something that makes it so that we can make this food more  
5 available, along with a host of other opportunities. I think  
6 to close this out, Wood, before we go to vote on this.

7 BOARD MEMBER TURNER: Thanks for the opportunity to  
8 chair the committee the last couple of years. I look forward  
9 to supporting the leader moving forward.

10 (Laughter.)

11 CHAIR POWELL-PALM: I don't like this, this  
12 trajectory we're going on. It's like a soft resignation. We  
13 worked my class too hard. All right, well, with that, let's  
14 see, we will go to the motion for our 2023 research priorities.  
15 Wood, if you would read it in?

16 BOARD MEMBER TURNER: Sure. Motion to accept the  
17 proposal on 2023 NOSB research priorities, yeah --

18 CHAIR POWELL-PALM: Motion by Wood.

19 BOARD MEMBER TURNER: Motion by me. Seconded by  
20 Dilip.

21 CHAIR POWELL-PALM: All right. And folks these  
22 conversations are so good, so I'm just going to guess that  
23 we're like in this area. So Kyla, we're going to start the  
24 voting with you.

25 BOARD MEMBER SMITH: Yes.

1 CHAIR POWELL-PALM: Amy?

2 SECRETARY BRUCH: Yes.

3 CHAIR POWELL-PALM: Kim?

4 BOARD MEMBER HUSEMAN: Yes.

5 CHAIR POWELL-PALM: Franklin?

6 BOARD MEMBER QUARCOO: Yes.

7 CHAIR POWELL-PALM: Wood?

8 BOARD MEMBER TURNER: Yes.

9 CHAIR POWELL-PALM: Logan?

10 BOARD MEMBER PETREY: Yes.

11 CHAIR POWELL-PALM: Carolyn.

12 BOARD MEMBER DIMITRI: Yes.

13 CHAIR POWELL-PALM: Allison?

14 BOARD MEMBER JOHNSON: Yes.

15 CHAIR POWELL-PALM: Brian?

16 BOARD MEMBER CALDWELL: Yes.

17 CHAIR POWELL-PALM: Nate?

18 BOARD MEMBER LEWIS: Yes.

19 CHAIR POWELL-PALM: Dilip?

20 BOARD MEMBER NANDWANI: Yes, yes.

21 CHAIR POWELL-PALM: Gerry?

22 BOARD MEMBER D'AMORE: Yes.

23 CHAIR POWELL-PALM: And the Chair votes yes. All  
24 right. And with that we're going to break for lunch. We're  
25 going to come back at 2:15. And we're going to have an

1 election. I'm sorry, Michele?

2 SECRETARY BRUCH: One second.

3 CHAIR POWELL-PALM: Oh, sorry. That was too quick.  
4 I'm too excited.

5 SECRETARY BRUCH: That's okay, no problem. 13 yes,  
6 zero no, zero abstentions, zero recusals, 2 absent. The motion  
7 passes. Thank you.

8 CHAIR POWELL-PALM: Because we've stolen 8 minutes of  
9 your time, we're going to come back at 2:20.

10 (Whereupon, at 1:08 p.m., a lunch recess was taken.)

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

2 (2:26 p.m.)

3 CHAIR POWELL-PALM: Welcome back, everybody. To  
4 finish out the day today, we're going to move onto officer  
5 elections, talk about our future work agenda items, materials  
6 update, and other business. Those two are going to be out kind  
7 of bucket to business other items. And then we're going to  
8 finish out. Thank you to those who are still hanging on both  
9 here and online. I hear there are about 50 people online. So  
10 thanks for going all the way to the end.

11 It's -- when I was first coming up, first year NOSB,  
12 Steve Ela would politely call every semester and say, so, you  
13 think leadership maybe sometime? And there's always a wide  
14 open door to say no. But I so appreciated that it was a  
15 precedent that anybody could be given the chance to lead this  
16 crowd. I think it's really reflective of the true nature of  
17 the democratic process for us. But this little talk I want to  
18 give is mostly a love letter to Mindee Jeffrey. And I'm going  
19 to cry, so just bear with me, everybody. I mean Carolyn is  
20 like, wow, NOSB may cry, shocker.

21 When we were coming up to fall meeting and, and Steve  
22 had asked everybody what are your thoughts on leadership,  
23 checking in with everybody, I had -- I had really gotten  
24 excited about fenbendazole back in -- back in the day,  
25 fenbendazole in chickens. And so I wanted to call -- and I

1 would, I would again give a shoutout to Steve when I said I  
2 don't know about fenbendazole, but it seems like LISAC (ph.)  
3 committee is saying, yeah, send it. And he's like I don't  
4 know, they might be there to say that maybe it's not a good  
5 idea. And it sort of gave me the inspiration to just start  
6 calling folks and seeing what they thought.

7           And so when I called Mindee, I'm like so what do you  
8 think about leadership. And she's like I think you need to  
9 send it, bro. Like you need to step the up and let's do this,  
10 like let's look at leadership, you and me. And there was a  
11 certain confidence that she brought to that conversation saying  
12 it's not going to be handed to you, that you have to earn it.  
13 And I think she brought this radical empathy that I have only  
14 begun to understood -- understand in the last little bit, the  
15 vision that she had for what this team could be.

16           And I think since so many boards before us and I hope  
17 some of the boards after us have been asking this question.  
18 How do we do the best work possible? I think that we can  
19 hopefully in the future look back and see Mindee's work as a  
20 key ingredient to the collegiality and the success that we are  
21 experiencing with this group today.

22           I'm going to wait until next year to give a shoutout  
23 to each and every one of you, because it has been a true honor  
24 to serve all of you. I really appreciate the confidence that  
25 you placed in me over the last two years. It's rare, I think,

1 that we get the chance to -- I get the chance to be here  
2 another year and hopefully be as useful to the next group of  
3 leaders as possible. And I'm just so dang excited about the  
4 next group of leaders and how we have a pipeline. We've really  
5 considered a deep bench and again I give a lot of credit to  
6 Mindee for thinking about not just this election, but over the  
7 next six years how we set folks up in positions of leadership,  
8 where they are learning how to be effective, compassionate, and  
9 truly visionary in how they try to lead this Board into the  
10 next era.

11 Last night we had a few conversations about what is  
12 the secret sauce that's going on in NOSB these days. And I  
13 throw no shade at previous boards, but I think we are doing  
14 pretty well. And I think there's a few things. And I would --  
15 I would put this out to the community to think about. For me,  
16 starting with fenbendazole, I got really comfortable calling  
17 every single member all the time. And probably a little bit  
18 too much for some of you, but asking your opinions and  
19 wondering where are you landing on this.

20 I think Steve Ela set a tone of collegiality that has  
21 persisted. And I remember in ammonia extracts that I was  
22 vice chair then. And I gave Logan a really hard time. She was  
23 so gracious. And I think we both allowed each other to fight  
24 it out on Zoom. The second we were off that Zoom call, we'd  
25 call each other and say nothing personal, right? And, you

1 know, what do you want to do? How can I help you? Is there  
2 something else where we can agree on and where to identify not  
3 our differences but our commonality.

4           And I think that diversity of thought and the ability  
5 to say that this Board, as far as we can take it, is a family.  
6 That this Board treats each other really well. And that  
7 whenever anyone comes for any one of you, I've always wanted to  
8 be ready to say un-un, these are our people. And we can have  
9 very tough conversations, that I think we experienced  
10 throughout this week. But we all know that it's a place of  
11 deep safety, that it'll never devolve into the personal. It  
12 will never be a place where we can't immediately hop up and go  
13 to lunch together. And it will always be a place that we hold  
14 each other sacred. And I think that I am just 1, 1 of 15 and  
15 trying to do that work that you all have let me do that work.  
16 And I'm so grateful to you all.

17           As we go forward, again, I think that I'm really  
18 bummed that -- rather, I know I'm really bummed that Mindee  
19 isn't here. Oh, I hear Mindee is listening, okay. I'm, I'm  
20 looking at Mindee's -- she always talked about democracy. And  
21 for the longest time I couldn't quite track where she was going  
22 with this. I'm talking about years she would talk about  
23 democracy. I'm like, yeah, we're Americans. We love  
24 democracy, okay.

25           And as I -- as I've gotten to learn from her, looking

1 at how the biggest piece of the democratic process is that when  
2 it doesn't go your way -- when it goes go your way, we don't  
3 question it. When it doesn't go your way, accepting it and  
4 saying that we put it to a vote amongst all of us, that if it  
5 doesn't turn out, similar to how we do elections in general,  
6 when it doesn't turn out your way that's fine. Let's keep  
7 going, as opposed to resting, and obsessing, and staying on one  
8 topic.

9 I think that that is something that as Mindee has  
10 described the power of this Board as a democratic institution,  
11 I really came to appreciate that everyone in this room has held  
12 that sacred. That after the vote is done, we move on. And we  
13 don't leave ideas. We don't lose values. But we do try to  
14 keep the work going forward. And I think that is something  
15 that I will always be grateful Mindee taught me.

16 So as we move to Board elections, I will give a huge  
17 shoutout to Mindee Jeffrey. I am very grateful for the chance  
18 to serve as -- you let a 29 year old be your chair. I'm just  
19 shocked. As your youngest chair and as a chair who got to  
20 serve two terms, and then I get a whole year to be a servant to  
21 whoever is coming next. And I really hope to be of use to you  
22 all.

23 I hope I speak for Mindee as well that this has been  
24 an opportunity to make a really big tent of leadership. There  
25 has been no gatekeeping over the last two years. When we say

1 leadership, we want to invite everybody in. And I think we've  
2 built a pretty good team. Historically, I think the Chair got  
3 to meet with Jenny a lot. And I wanted to make it so that the  
4 Chair, the Vice Chair, the Secretary, everyone who is leading  
5 this Board sees the program as a partner. And I think we've  
6 gotten to get -- we've had the chance to get ahead of  
7 miscommunications, poor communications, blocked communications,  
8 because we've had everyone in the room, and we can assure  
9 everyone that there is real partnership with this program.

10 And so I am really excited as we go into this next  
11 year how we can keep this train going. I'm going to do my best  
12 to keep serving you all in any way I can. And I really thank  
13 you again for the confidence and the chance to serve. Thank  
14 you.

15 (Applause.)

16 CHAIR POWELL-PALM: Thank you. Let's now go to some  
17 nominations. So we're going to start with the position of  
18 secretary. I am not running again, so I am, if it's all right  
19 with everyone, going to be the vote counter. And we're going  
20 to start with the secretary. We will accept nominations for  
21 the position. After nominations are confirmed -- we're going  
22 to start with the pink card. That's going to be our secretary  
23 card -- oh, let's start with the green card. I didn't have a  
24 blue card, so I wasn't thinking that. The secretary might be a  
25 man, you never know. Like good point.

1           We're going to start secretary with the green card.  
2           The white card is going to be vice chair. And the pink card is  
3           going to be chair. So with your green card, I would open the  
4           floor to nominations for the position of secretary for the  
5           NOSB. Gerry, please go ahead.

6           BOARD MEMBER DIMITRI: I'd like to nominate Nate  
7           Lewis.

8           CHAIR POWELL-PALM: Thank you. Nate, do you accept  
9           the nomination?

10          BOARD MEMBER LEWIS: I just learned how to count to  
11          15, so, yes, I will accept that nomination.

12          CHAIR POWELL-PALM: Kim?

13          BOARD MEMBER HUSEMAN: A question for you about two,  
14          and seven, and four, but we'll skip that for now.

15          BOARD MEMBER LEWIS: I know how to play -- I'm a big  
16          cribbage player, so I'm really good at 15.

17          BOARD MEMBER HUSEMAN: Okay, good to know. I would  
18          like to nominate Allison. The voice that you bring, the  
19          background that you bring, your viewpoint, I really feel like  
20          you would be an excellent person on the -- not that there's  
21          others that aren't as well, but I really appreciate my time  
22          with you and I would like to nominate you as secretary, also.

23          CHAIR POWELL-PALM: All right. Any other  
24          nominations? Oh, I apologize. We assumed that you're too  
25          qualified, Allison, so you're automatically accepting. Please

1 do formally accept it.

2 BOARD MEMBER JOHNSON: I do accept. Thank you.

3 CHAIR POWELL-PALM: Thank you. Other nominations for  
4 the position of secretary? All right. So we have Nate Lewis  
5 and Allison. If you would take your green card and write the  
6 name of your preferred candidate on the back, fold it in half,  
7 and pass it to me.

8 (Pause.)

9 CHAIR POWELL-PALM: Do we announce the tally? No,  
10 okay. Thank you very much both for running. The winner of  
11 secretary for this coming year is going to be Nate Lewis.

12 (Applause.)

13 CHAIR POWELL-PALM: But that doesn't mean you're not  
14 in the pipeline, Allison. So plan to come to these leadership  
15 meetings. We appreciate you. All right. We'll move onto the  
16 position of vice chair. Nominations for the position of vice  
17 chair?

18 BOARD MEMBER PETREY: I'd like to nominate Amy Bruch.

19 CHAIR POWELL-PALM: Amy, would you accept that  
20 nomination?

21 SECRETARY BRUCH: Yes. Thank you, Logan.

22 CHAIR POWELL-PALM: Carolyn?

23 BOARD MEMBER DIMITRI: I would like to nominate  
24 Allison.

25 BOARD MEMBER JOHNSON: I love it.



1 CHAIR POWELL-PALM: So we have Amy. We have Allison.  
2 Other nominations? Do you accept, Allison?

3 BOARD MEMBER JOHNSON: Sure. Thank you.

4 CHAIR POWELL-PALM: All right. With your white card,  
5 please write the name of your preferred candidate, Amy or  
6 Allison, for the position of vice chair.

7 (Pause.)

8 CHAIR POWELL-PALM: With all votes tallied, our next  
9 vice chair will be Amy Bruch. Congratulations.

10 (Applause.)

11 CHAIR POWELL-PALM: And lastly we will open for  
12 nominations to the position of chair. Amy, please go ahead.

13 SECRETARY BRUCH: I would like to nominate my  
14 tablemate, Kyla. I appreciate your technical aptitude, your  
15 dedication to the community, and just your overall leadership.  
16 Thank you.

17 CHAIR POWELL-PALM: Other nominations for the  
18 position of chair? With one nomination, I propose we vote by  
19 unanimous decree, consent. Any dissent for Kyla as the chair  
20 of the National Organic Standards Board 2023-2024 year? All  
21 right, congratulations.

22 (Applause.)

23 BOARD MEMBER SMITH: Thank you. I feel quite honored  
24 and humble. So I look forward to working with all of you.

25 CHAIR POWELL-PALM: All right. We will keep going

1 with the agenda for the day. Congratulations, all three of  
2 you. For chair, we have Kyla Smith. For vice chair, Amy  
3 Bruch. And for secretary, Nate Lewis. I'm really excited for  
4 this team. This is going to be a great year. So thank you  
5 again, everybody.

6 All right. Next up, we're going -- do we need a  
7 break? We're doing good? Please, go ahead, Carolyn.

8 BOARD MEMBER DIMITRI: I want to thank the three of  
9 you for being willing and also you, Allison, for being willing  
10 to provide leadership. I think it's a really hard job and  
11 probably pretty thankless. So I'm going to thank you in  
12 advance for everything.

13 CHAIR POWELL-PALM: It's a reminder for us all to  
14 thank them actively throughout the year. Thank you, to start.  
15 All right, going down into materials update and NOSB work  
16 agendas. Do we have a slide -- there we go. I'm going to  
17 start it off with -- let's go back. I'm not going to read it.  
18 I made that mistake last October. But I'll try to slowly  
19 scroll. And this is all publicly available, so you can take  
20 pictures of it. But it's available on the website, as well.

21 (Pause.)

22 CHAIR POWELL-PALM: As Kyla mentioned, it's going to  
23 be a popping handling season. Holy smokes. A lot of materials  
24 to cover.

25 (Pause.)

1 CHAIR POWELL-PALM: So I'm going to hand it over to  
2 Nate Lewis for a little update on compost and inerts.

3 BOARD MEMBER LEWIS: There should be some slides  
4 there that I entered. So my, my compost comrade, Mindee  
5 Jeffries, unfortunately isn't here. So I'm pinch-hitting for  
6 her. Thanks. So the Board is going to take on the issue of  
7 compost use in organic agriculture. And this is a topic that  
8 near and dear to both Mindee and myself. We're both certified  
9 compost facility operators. Mindee actively manages a  
10 commercial composting operation and I compost on my farm.

11 So right now we're dealing with a number of updates  
12 that we're looking to discuss as a Board and with the  
13 stakeholder community. And we and the program has recently  
14 received a petition for rulemaking from, from BPI, the  
15 Bioplastics Industry Alliance is the correct acronym descriptor  
16 there. So let's see. Greenland? Oh, there we go.

17 So let's see. Just briefly the areas that we're  
18 going to be looking at. Currently, compost exists in all parts  
19 of the rule. So we have compost as a definition. We've got  
20 compost in practice standard. And we have compost feed stocks  
21 on the national list. So compost touches all aspects of the --  
22 of the rule.

23 Issues related to compost production that Mindee and  
24 I are particularly focused on are in the, the definition item  
25 number 1 and number 3, 1 being the C to N ratio, carbon to

1 nitrogen ration. These, all these numerics were based on  
2 composting practices and technology from the '80s, which was  
3 logical at the time of the promulgation of this rule. But now  
4 we think it's time to do a revisit.

5           You can make good compost with an initial carbon to  
6 nitrogen ratio of less than 25 to 1. And the wording in  
7 number 3 around the 15 days is a little bit problematic.  
8 Oftentimes, turn windrow systems take longer than 15 days for  
9 those temperatures. And we're going to remain focused on those  
10 times and temperatures to make sure that they are aligned with  
11 industry best practices for reduction of human pathogens, which  
12 is the main -- one of the main benefits of having these times  
13 and temperatures.

14           Again, as I mentioned, it's in 205.203, so we're  
15 going to be -- which is the soil fertility and crop nutrient  
16 management practice standard, so we'll be trying to align these  
17 elements with the definitions. And it's specifically around  
18 those same issues. So we see these numbers show up both in the  
19 definitions and in the practice number.

20           And then as we saw during this meeting, we just  
21 renewed the listing for newspaper and other recycled paper as a  
22 compost feed stock. Compost feed stocks have a place on the  
23 National List currently. They do not have a definition,  
24 however. So that is a incongruity that we'd like to resolve.  
25 But I'm just using this to illustrate that compost is in all

1 different aspects of the rule.

2 I want to acknowledge that the program has received a  
3 petition for rulemaking. This is a summary. If you -- if  
4 folks look at the memo that was issued to the Board, the  
5 petition is referenced as an attachment to that. But as a  
6 summary, the petition recommends rulemaking to include a new  
7 definition for compost feed stock. I have it up there. Animal  
8 and plant materials, and materials meeting compost stability  
9 specifications, etc., etc. And they recommend replacing plant  
10 and animal materials with a new proposed term. They do not --  
11 they do not specifically indicate how to address the National  
12 List category of synthetic compost feed stocks.

13 So this is a broad topic, obviously, and a  
14 foundational one for organic. Compost is a foundational  
15 material and a foundational principal of organic production and  
16 touches all areas of the rule. The memo I think appropriately  
17 but in some way a little bit overwhelmingly reflects that. So  
18 here is a list of all the stuff that might be included in this  
19 compost discussion and recommendation, which is pretty much  
20 everything. Definitions, practice standard, National List,  
21 guidance, UREC, which is unavoidable residual environmental  
22 contamination, and then specific contamination and testing.  
23 Compost as an input in organic agriculture. So the kitchen  
24 sink approach to a broad topic.

25 Any questions from the Board? Otherwise, I can tip

1 it to inerts.

2 BOARD MEMBER NANDWANI: Yeah, this is a -- thanks,  
3 Nate. I just realized that -- I just realized that reading  
4 this regulation, which I've been teaching in these workshops  
5 and often farmers, they ask me a question. These three  
6 regulations, the points you have mentioned, the turning 5 times  
7 in 15 days, and the 230 degree Fahrenheit. And so farmers,  
8 they think that this is a very difficult and cumbersome process  
9 to making compost. This new recommendation, I'm sorry if I  
10 missed it, do you think that the process you are going to --  
11 you are proposing or recommending is going to be simpler for  
12 the end users?

13 BOARD MEMBER LEWIS: Hard to -- don't, don't pin me  
14 down on this, but I would be surprised if we deviated too much  
15 from that. Those numbers, and the times and temperatures are  
16 critical for reducing human pathogens found in, in manure. And  
17 those, those numbers are -- you must follow those numbers in  
18 order to apply your composted manure outside of the 90 and 120-  
19 -day withholding time.

20 So in light of industry best practices and the need  
21 to make sure that organic food remains safe for consumers to  
22 eat, I don't anticipate us recommending something that would  
23 lighten that burden. But in terms of guidance, I think we  
24 could potentially look at what sort of recordkeeping folks  
25 would need to, to have. But those, those numbers are widely

1 accepted and the threat of food borne pathogens, I think, is  
2 relevant enough that I wouldn't anticipate seeing something to  
3 loosen those standards.

4 BOARD MEMBER NANDWANI: Thank you.

5 BOARD MEMBER LEWIS: Okay. What happens if I go --  
6 okay, we'll just go to -- oh, this is the blank slide. I don't  
7 have any slides for the inerts group. And I will want to lean  
8 on other members of the working group. So Brian, Logan,  
9 Franklin, and myself are taking on, as members of the Materials  
10 Subcommittee, the memo from the program related to inert  
11 ingredients and organic pesticide -- or pesticide products  
12 approved in organic agriculture.

13 And as a summary of kind of what we're planning to  
14 do, our first steps have been to begin to understand the  
15 options laid out by the program for ways we could move forward.  
16 So we want to work from an area of common understanding there.  
17 And we hope to solicit support from Esu and Heather, our newest  
18 members of the Board and support network to develop a  
19 comprehensive list of what is currently allowed under List 4,  
20 and how those would look, and what types of materials would be  
21 available for use under the various scenarios.

22 So we're still in sort of data collection mode so  
23 that we can develop recommendations based on a common  
24 understanding and a common set of data. I think I'll leave it  
25 there. And Brian, Franklin, or Logan want to add any to that,

1 I would welcome your input.

2 BOARD MEMBER CALDWELL: Just really quickly, I'm  
3 really excited to be working on this and really excited looking  
4 forward to getting, getting some serious results. So thanks,  
5 Nate, for excellent leadership so far. And, you, too, for  
6 being on that, this effort.

7 BOARD MEMBER LEWIS: I think with that I'll turn it  
8 back over to the chair to discuss other business.

9 CHAIR POWELL-PALM: All right. The last thing we're  
10 thinking about touching on would be annotations. And Kyla,  
11 would you lead us in that discussion?

12 BOARD MEMBER SMITH: Okay. So earlier this year we  
13 did submit an agenda request that was approved by the program  
14 for there to be a standing work agenda item in the crops,  
15 livestock, and handling subcommittees for annotation changes.

16 The process that I sort of laid out and we talked  
17 about at the Executive Committee, so I'm just going to  
18 reiterate it here is that during the spring write-up of the  
19 material, we would flag if there is any known annotation  
20 request by looking back at previous write-ups, or there have  
21 been public comments that had a little bit more of a  
22 comprehensive list, so using those two sources or other  
23 sources. And including that in the spring write-up perhaps as  
24 a question or here's this annotation wording, does this look  
25 good, or whatever, you know, we're sort of framing it up to get



1 feedback.

2           Then during the fall write-up, if there was consensus  
3 around that proposed annotation, there would be two proposals,  
4 one on the sunset write-up at -- so that we could vote on the  
5 material that is before us for the sunset process, and a  
6 separate document that we would vote on that would be the  
7 annotation change.

8           We haven't done that this round, because we thought  
9 this sort of too late for this group. But I would encourage us  
10 as we're going into next year, the 2026 sunsets, I know  
11 Handling has already started work on that, but just to keep an  
12 eye out for annotation changes and include that as part of your  
13 write-up so that we could -- we can get feedback and follow  
14 that process.

15           I specifically wrote it this way so that this would  
16 remain evergreen, like as a process that we are able to do  
17 ongoing, as opposed to just trying to fix all the things that  
18 we know and it just not being part of our process. And, again,  
19 this bakes it in, you know, and it doesn't rely on humans to  
20 remember or initiate that process, which hasn't seemed to be  
21 super effective because we have not very many changes, which is  
22 -- yeah, so here we are.

23           I will also just state that as Jenny said earlier I  
24 think at this meeting just to be cautious with annotation that  
25 there is an impact to certifiers to verify the annotation, as

1 well as for farmers, and processors, and other folks in the  
2 supply chain to implement the annotation. And so we're not  
3 trying to go annotation happy here and making tons of changes.  
4 But where they -- where there is clarity needed, we have the  
5 mechanism to, to do that.

6 CHAIR POWELL-PALM: Questions for Kyla? Nate.

7 BOARD MEMBER LEWIS: I think I know the answer to  
8 this, but can you clarify if the annotations would come as a  
9 parallel to a clean renewal vote for --

10 BOARD MEMBER SMITH: Yes.

11 BOARD MEMBER LEWIS: So, yes, it would be a parallel.

12 BOARD MEMBER SMITH: Yes.

13 BOARD MEMBER LEWIS: Okay.

14 BOARD MEMBER SMITH: Otherwise, we will find  
15 ourselves in the sodium nitrate problem, because that, that's  
16 why they changed the process to not do annotation changes at  
17 sunset was because that motion didn't pass. And here we are  
18 having an invalid listing. So we need both motions and votes.

19 BOARD MEMBER LEWIS: So we will always have the clean  
20 sunset motion.

21 BOARD MEMBER SMITH: Yes.

22 BOARD MEMBER LEWIS: And then there is a possibility  
23 to have a parallel one that either amends or introduces a new -  
24 -

25 BOARD MEMBER SMITH: Yes.

1 BOARD MEMBER LEWIS: -- annotation.

2 BOARD MEMBER SMITH: Yes.

3 CHAIR POWELL-PALM: Logan, then Dilip.

4 BOARD MEMBER NANDWANI: I'm just trying to  
5 understand --

6 CHAIR POWELL-PALM: I'm sorry. One second. Logan  
7 first and then Dilip.

8 BOARD MEMBER PETREY: Okay. So can we have like a  
9 template for -- almost like we do for a proposal or discussion  
10 documents that would be an annotation, so that we can put what  
11 is the impact of putting this on. Or we notice -- because it  
12 seems like it has to be done pretty quickly. And so if we can  
13 make that like clear statement of what needs to be made on like  
14 a template to, to qualify for that?

15 And then also on the sunset, if we can add -- I know  
16 they were just kind of redone where you have the international  
17 acceptance, but so that it's easily seen to have annotation  
18 requests or something like that on our sunsets. That way we  
19 can -- each person can identify it quickly. That way they're  
20 not overlooked or anything like that. So having it in the  
21 language or in the discussion, or something somewhere if that  
22 becomes kind of a big process. But those are just two  
23 thoughts.

24 BOARD MEMBER SMITH: Thanks, Logan. I would say,  
25 too, that I think it was Nate Lewis who brought up even trying

1 to front-end this a little bit more, so as opposed to when  
2 we're just doing the write-ups. When we're doing the TR  
3 sufficiency, right? So when we're doing that in the spring for  
4 the sunset materials that are going to be in like 2027, even  
5 looking at it then just again to try to like get ahead of it as  
6 much as possible. Yeah, I thought that was a great suggestion.

7 CHAIR POWELL-PALM: Dilip?

8 BOARD MEMBER NANDWANI: I think you've already  
9 answered. What I'm just trying to understand here, are you  
10 going to work on the new annotations on 2026 sunsets, or some  
11 materials or the sunsets, they already have annotations we are  
12 going to read and revise them much?

13 BOARD MEMBER SMITH: Yeah. So I'll give an example.  
14 So phosphoric acid, for example, on the Handling list that we  
15 just voted on. But let's pretend that that was on our list for  
16 next year. The community has said that the word cleaner in  
17 that is inaccurate. And so we would put forth the write-up on  
18 the sunset as-is in the spring and somewhere in that document  
19 we would say we're proposing to change the annotation to  
20 whatever, revise that to no rinse sanitizer or whatever the  
21 more accurate thing to say versus cleaner is. And that would  
22 go out. The community would get to weigh in on that as well.  
23 And then we would have two motions and proposals that we would  
24 vote on, one the regular listing, one the new annotation.

25 BOARD MEMBER NANDWANI: Thank you.

1 CHAIR POWELL-PALM: Other questions for Kyla? Brian,  
2 go ahead.

3 BOARD MEMBER CALDWELL: Yeah, following up on what  
4 Logan said. So for the first time around, who, who will find  
5 out what, what all the suggested annotations are for each, each  
6 sunset material?

7 BOARD MEMBER SMITH: I would say that will be up to  
8 whoever the lead is. And perhaps the chair of the committee  
9 could help. I've been tracking things in Handling for a minute  
10 now, so I'm happy to help.

11 BOARD MEMBER CALDWELL: Okay. And I know that, that  
12 some of our stakeholders have compiled lists, too.

13 BOARD MEMBER SMITH: Yes.

14 BOARD MEMBER CALDWELL: So we will look for those.  
15 And if you have any, any suggestions. Michelle should --

16 BOARD MEMBER SMITH: Oh, how about this. When the  
17 open docket is opened after the start of the meeting, anything  
18 that's on 2026, folks, get in your annotation request changes  
19 now so we can start building them in.

20 CHAIR POWELL-PALM: Carolyn?

21 BOARD MEMBER DIMITRI: I mean just to follow-up on  
22 Brian's question, I suppose we could also, when we put the  
23 first announcement out for the spring meeting, our questions to  
24 stakeholders, we could just ask does this need an annotation.  
25 And I don't know if that would give enough time, but at least

1 it would get it in the queue and we could write it up in the  
2 discussion section.

3 BOARD MEMBER SMITH: Yeah. That's why, again, we're  
4 I feel like opening it up to does it. Like in the spring is  
5 maybe a little bit too late. So I'm trying to get more  
6 information sooner I think would be better. But yes.

7 CHAIR POWELL-PALM: Allison?

8 BOARD MEMBER JOHNSON: A though on that point. I  
9 wonder if we can make a point of posting the list of the  
10 two-years out sunsets somewhere at the fall meeting or in the  
11 fall meeting materials. So if there are comments looking  
12 ahead, people could start to submit those in the fall so we  
13 have them going into the next spring. I'm not quite sure what  
14 the right place would be, maybe either materials or, but that  
15 would be just the reminder. Because I, as a person who was  
16 outside of this Board, was certainly not thinking about  
17 materials two years ahead.

18 BOARD MEMBER SMITH: Yeah. These are all fabulous  
19 suggestions. And then one observation question, I guess. The  
20 order of the motions I think is going to become important,  
21 because there are a number of materials. I'm thinking of  
22 liquid fish. If an annotation had changed, that would have  
23 impacted the decision of whether to sunset it or not. So if we  
24 vote on the sunset, you don't yet know if the annotation is  
25 going to be adopted. So whatever we do, we should be clear

1 going in which order we're going to consider these things in.

2 CHAIR POWELL-PALM: Carolyn?

3 BOARD MEMBER DIMITRI: Just one more follow-up  
4 question. I mean I think that we should probably assume it  
5 will take two cycles for all the annotations to be complete.  
6 Because I don't know, I just feel like I don't -- this seems  
7 like a lot of pressure to like identify it before the spring  
8 meeting. And if we just give ourselves the leeway to say that  
9 this is a process that might take five years as products go  
10 through the sunset. And that way, I don't know, it will just  
11 give us a little bit more room to -- as we move ahead, so we  
12 can hit the obvious ones right away. Anyway, that would reduce  
13 my level of anxiety.

14 CHAIR POWELL-PALM: Wood.

15 BOARD MEMBER TURNER: But technically this is a live  
16 process. So what Carolyn's saying is -- it makes sense, but it  
17 could -- there could always be an annotation that could come  
18 up. This is to make these more relevant in real time. Yeah?  
19 Is that right?

20 BOARD MEMBER SMITH: Yes. I do think, though, that  
21 like again just to be cautious that I think once we make some  
22 -- there is definitely clean-up, I think. And I do think once  
23 we -- whatever, so we're sort of starting with 2026, so once we  
24 hit 2031, we'll have cleaned up the list in large part.  
25 Granted, there will be new petition materials, which will then

1 -- that's why I thought having sort of baked into the process  
2 was good so that then we didn't have to be like, okay, well, we  
3 cleaned up the list, but now there's these new things, now  
4 we've got to do it again. You know what I mean? So --

5 CHAIR POWELL-PALM: Nate?

6 BOARD MEMBER LEWIS: Allison, your point kind of got  
7 my head turning about just how those votes impact one another.  
8 And I think the fish annotation is illustrative of the  
9 program's ability to decide not to take up an annotation.  
10 Right? So, yeah, just sort of interesting to start thinking  
11 about it. It seems like we will be giving them a second option  
12 for the renewal of these substances, as opposed to a  
13 substitute. Does that make sense? But it's a really good  
14 point and got my gears turning. Thank you.

15 CHAIR POWELL-PALM: Wood, then Kyla.

16 BOARD MEMBER TURNER: This is a little obtuse for me.  
17 Can we -- can we be clear what we're talking about here? So  
18 are we saying we want to vote on the annotation first and then  
19 the listing? I mean I just don't understand what you're  
20 talking about, sorry.

21 BOARD MEMBER LEWIS: And, Allison, join in, too, but  
22 what I heard Allison say was which vote comes first may impact  
23 the subsequent vote. If an annotation -- if the annotation  
24 vote comes first, and that's what you would prefer to see, you  
25 may vote then on the clean relisting in a different way. And



1 we just need to be thoughtful about what impact that may have  
2 one messages we're sending to the community, what the National  
3 List looks like.

4 CHAIR POWELL-PALM: Kyla?

5 BOARD MEMBER SMITH: Oh, I was just going to say that  
6 if the community is submitting things into the open docket,  
7 providing the, the impact part would be really helpful.

8 CHAIR POWELL-PALM: Allison.

9 BOARD MEMBER JOHNSON: Yeah, just following up on  
10 Wood's question. I'm thinking -- and Carolyn's actually also  
11 about timing. I think the, the logistically correct way to do  
12 this adding onto the system that we have of sunsets being their  
13 own thing is the sunset vote should come first. And then the  
14 annotation is sort of like a bonus. And that allows in the  
15 case where we don't have the annotation issue worked out in the  
16 fall, we deal with the sunset and then the annotation  
17 discussion can bleed into the next meeting.

18 But it's not -- it -- it's not an elegant solution.  
19 It's not a clean way to deal with the issues, because they are  
20 interrelated votes.

21 CHAIR POWELL-PALM: We'll go Gerry, then Kyla.

22 BOARD MEMBER D'AMORE: Yeah. Thank you for slowing  
23 down there, because it struck me that we were going to make a  
24 presumptive close on something there. And you shook your head.  
25 If that's what you're retreating from a little bit, then I'm --

1 then I'm satisfied.

2 BOARD MEMBER SMITH: I don't -- I don't know that we  
3 have to decide this today, but I do think we should decide  
4 before we implement this process.

5 BOARD MEMBER D'AMORE: Right. And I think we should  
6 all be very, very aware. I love this initiative. I think it's  
7 essential. But I think we should be really, really aware of  
8 the workload this is going to put on. This is -- this is not  
9 just a little add-on. And this may sound really strange to say  
10 right now, but I think we should sort of start of this not with  
11 the notion that every annotation is evil and consider it almost  
12 a victory that we can go on with no, no new annotation. Thank  
13 you.

14 CHAIR POWELL-PALM: Kyla?

15 BOARD MEMBER SMITH: Yeah. Again, I think that the  
16 being cautious here is good. And we can try to take it slow  
17 and just see, because -- what am I trying to say. If, if we  
18 voted on the annotation change first and then that impacted  
19 someone's vote on the sunset to not renew it, then it has to go  
20 to rulemaking. And you could get different stuff in  
21 rulemaking, where then that annotation we sort of put all of  
22 our eggs into that basket doesn't go through. And then there  
23 is no listing. So there is some real impact. Does that -- do  
24 I need to say that again?

25 BOARD MEMBER LEWIS: Say that one more time.

1           BOARD MEMBER PETREY: Yeah. So for liquid fish, for  
2 example, if we were to put the annotation that it had to be  
3 from certain harvested fish and then that was not accepted,  
4 liquid fish would be off the list. Is that what we're saying  
5 or --

6           BOARD MEMBER SMITH: Right. So if we -- yeah. So if  
7 there was an annotation change and if we voted it through, then  
8 the sunset listing we voted to delist it, right? Then the  
9 annotation change would go to a proposed rule through the  
10 program. The program would seek comments. They will evaluate  
11 those comments and decide whether or not to --

12           CHAIR POWELL-PALM: Anything the program would like  
13 to throw in here?

14           DR. TUCKER: Okay. This gets really complicated just  
15 looking at the looks across people's faces. I think -- I think  
16 I want to build on what Kyla is saying. So if in the same  
17 meeting that you voted on an annotation, so there's Thing Y and  
18 we want to annotate Thing Y to do Z, right? And then there was  
19 another vote that we're going to vote to take Y off the list.  
20 I'm guessing that we would do one rulemaking that would say  
21 here are two options with Y, one is to leave it the way it is.  
22 Another is to do an annotation. A third is to remove it  
23 entirely. I think that's how -- Jared's nodding. He's not  
24 kicking me under the table. For the record, the National List  
25 manager is not kicking me under the table.

1           So I think we would do -- I think we would end up  
2 doing rulemaking with multiple options in that case, because I  
3 think we all learned through the sodium nitrate experience that  
4 we don't want to go there. And so I think that's how we would  
5 handle it. And I do want to re-emphasize what Kyla said  
6 earlier about be careful with annotations. I'm going to just  
7 give the cautionary tale on how this plays out.

8           So let's say a certifier decides to do a  
9 non-compliance to an operation because they used a material  
10 incorrectly. And the certifier says, oop, that's prohibited  
11 material because you didn't use it the way the annotation says,  
12 so we're going to give you a proposed suspension. And the  
13 operation appeals that proposed suspension. We haven't seen  
14 this very often recently.

15           However, in the past, those appeals go to the  
16 administrator's office within AMS. And administrator who, you  
17 know, may or may not know all the intricacies of the National  
18 List is going to say I got this poor farmer who saw this  
19 material on a list, used it, and this -- it's on the list, why  
20 can't they use it? So he's got the sanitation, but it's on the  
21 list and why would we hurt farmers.

22           And so AMS administrators, and again this has not  
23 come up under this administrator, so I want to be really clear  
24 on that. But we did experience this a few years back with an  
25 administrator who had -- and a couple of administrators who

1 just had a really hard time with this kind of concept. And I  
2 promise that if it makes it to an ALJ, administrative law  
3 judge, they're going to be even more on the farmer's side.

4 So that's, that's how this annotation plays out on  
5 the backend. So those are two different pieces on how this  
6 plays out. Does that help or make it worse?

7 BOARD MEMBER SMITH: No. That makes me feel like so  
8 much better. I mean especially the like one rule that covers  
9 different options. Because I was like, oh, man, this could get  
10 messy quick. So that makes me feel a ton better, thanks.

11 BOARD MEMBER PETREY: I'm sorry. I'm not following.  
12 So you're saying that we could have -- we can vote -- I'm just  
13 going to use liquid fish since we just went through that. So  
14 we can vote liquid fish to fail to delist it and then vote the  
15 annotation to accept it. And then move it on to you. But we  
16 don't have to delist liquid fish because we want -- we're  
17 expecting the annotate. But the current listing of liquid fish  
18 without the annotation, we don't have to delist that. We're  
19 just trying to --

20 DR. TUCKER: Correct. Correct. I was just saying --  
21 yeah, I was just -- there seemed to be a concern that if we  
22 delist it that would be weird with also doing an annotation.  
23 I'm saying that to change the list, we have to do rulemaking.  
24 So we would consider the delisting recommendation at the same  
25 time we would consider the annotation. And just have a backup

1 plan. We'd probably list the third option of just keeping it  
2 as-is for public comment.

3 Now let's take your case. If the Board voted not to  
4 delist and plain language to keep on, right?

5 BOARD MEMBER PETREY: Yes.

6 DR. TUCKER: So vote not -- and to keep on the, the  
7 list, then that would just go through the relisting Federal  
8 Register notice. That's when they would part ways, where the  
9 relisting would just happen through a Federal Register notice,  
10 the annotation then would be considered during rulemaking. So  
11 that, that would be where the process would split on that.  
12 Because the material it would be safe to say -- safe to say  
13 based on the vote. So that part wouldn't require rulemaking  
14 because you wouldn't be change it. The annotation would go  
15 through rulemaking to get public comment before that listing  
16 actually changed.

17 BOARD MEMBER PETREY: Okay, thank you.

18 DR. TUCKER: Does that help or make it worse?

19 BOARD MEMBER PETREY: Yes.

20 BOARD MEMBER SMITH: I can make a PowerPoint.

21 DR. TUCKER: I feel like an eye doctor, is that  
22 better or is that worse?

23 CHAIR POWELL-PALM: Wood and then Kim.

24 BOARD MEMBER TURNER: So ostensibly we're going to  
25 have more -- there's going to be more things that are going to

1 need to go to rulemaking. And so we've had a bunch of  
2 conversations over the course of this meeting about rulemaking  
3 and delays in rulemaking. And we've celebrated some rules.  
4 And we've talked about some rules that didn't get made. And I  
5 just want to make sure that we're not talking about a log jam  
6 situation here that's going to be -- there's going to be a ton  
7 of listings here that are going to be sitting there waiting for  
8 rulemaking, no offense to the program and the process. But  
9 that's a big issue.

10 DR. TUCKER: The program agrees with that concern.

11 CHAIR POWELL-PALM: Kim?

12 BOARD MEMBER HUSEMAN: Yeah. Kyla, I really commend  
13 your work in this space, and your understanding and your  
14 knowledge around it, and the cautionary approach. But I do  
15 appreciate that we're raising this and that we are discussing  
16 this, because on the Board I cannot tell you how many times I  
17 have read a sunset and followed it with and the community  
18 acknowledges that there should be an annotation that is during  
19 the sunset process so, and then it just gets -- it gets  
20 forgotten.

21 So I realize this is -- this is not an easy ask. And  
22 I realize the complexity of it. And then I also appreciate  
23 the, the thoughts and the aptitude of this Board, because I  
24 think if we are going to make a stride, we've got a good group  
25 to, to really do that, to try.

1 DR. TUCKER: I don't want my last comment to be heard  
2 as not supporting this. I just want to make sure that we  
3 really use it judiciously. I think it's just be careful, I  
4 think is what the point is from the program.

5 CHAIR POWELL-PALM: Amy and then Gerry.

6 SECRETARY BRUCH: I think, okay, sorry. Kyla, thank  
7 you for your work on this. One comment, though, for  
8 priorities, because this will add additional work and we do  
9 have a lot going on. One thing the community could do also is  
10 request a petition for us then to have this on a work agenda  
11 item for a material in specific that's really ranking high  
12 correctly. If we're not -- if it's not on our radar, that is  
13 also another route. I don't see that happening very often that  
14 we get petition requests from the community for annotations.  
15 We see it a lot in comments. But that's there can be parallel  
16 paths here. Because I think still prioritizing is going to be  
17 important just because we need to manage our other workload as  
18 well. Okay, thank you.

19 CHAIR POWELL-PALM: Gerry?

20 BOARD MEMBER D'AMORE: Thank you. I'm just now going  
21 to have to tail on what you said, because I, I think that the  
22 first step towards normalization, a manageable situation is to  
23 have somewhat of a gate, and that's a bad word, gatekeeper  
24 that, that says this one, this one, this one. When we first  
25 started talking about it, it almost seemed like each and every



1 one of us, the lead could say hey. And I think that would be,  
2 that would, you know, especially out of the gate that we need  
3 to find a tempo that is satisfying to the workload.

4 CHAIR POWELL-PALM: Nate?

5 BOARD MEMBER LEWIS: Yeah. In that vein, Gerry, I  
6 think that may be an area we can build out as an expectation  
7 for a crop/livestock handling lead or chair, the chair of those  
8 committees to, to kind of make sure workloads are managed and  
9 not everyone has every annotation at any one time and sort of,  
10 yeah, have the discretion to sort of support or encourage to  
11 delay certain, certain work.

12 CHAIR POWELL-PALM: Logan?

13 BOARD MEMBER PETREY: So how do we start this next  
14 year? I guess we're close to April and we don't have any work  
15 done on that. So, yeah, how do we get started?

16 BOARD MEMBER LEWIS: So in handling, I have L-malic  
17 acid, which it's a little bit of a different issue, but it's a  
18 classification issue. It's non --

19 BOARD MEMBER PETREY: That's right, yeah.

20 BOARD MEMBER LEWIS: Non-synthetic, synthetic issue.  
21 And so handling is a little bit ahead of the other  
22 subcommittees, but I've already presented on that material.

23 BOARD MEMBER PETREY: Yes.

24 BOARD MEMBER LEWIS: Outlined the issues and  
25 indicated to the subcommittee my interest in bringing forward a

1 parallel recommendation around classification. So I think just  
2 as we start doing our sunsets, you can raise the issue.

3 BOARD MEMBER PETREY: Okay. We found that issue  
4 where?

5 BOARD MEMBER LEWIS: This one is also -- is a little  
6 unique, because it was a previous Board agenda item. But there  
7 are a number of places to look for annotation options. One is  
8 in the public comments.

9 BOARD MEMBER PETREY: Your discussion in the  
10 previous.

11 BOARD MEMBER LEWIS: Discussion in the previous,  
12 yeah, previous sunset.

13 BOARD MEMBER PETREY: Okay. That would be nice in  
14 the sunset if we do have like kind of an identified area. If  
15 we can't get some of these on quick enough, that maybe it's  
16 easy to find. So I need to get to work, is what you're saying.  
17 I need to read.

18 BOARD MEMBER SMITH: So we, you know, because we have  
19 so many sunsets in handling, we started doing some discussion  
20 prior to this meeting.

21 BOARD MEMBER PETREY: Correct, yes.

22 BOARD MEMBER SMITH: And that has been something that  
23 we have talked about. Like I know I presented on and I don't  
24 remember what it was at this moment in time, but there wasn't  
25 any noted annotation. So I would just, you know, we've been

1 sort of baby-stepping our way in. But, yeah, once new  
2 subcommittee, not maybe new, subcommittee chairs and vice  
3 chairs get assigned, I think that could be another just flag  
4 to, to those folks to help. Because again this is a new  
5 process.

6 BOARD MEMBER PETREY: Okay, thank you.

7 CHAIR POWELL-PALM: Any other thoughts or questions?  
8 All right. Well, thank you for that. I'm really excited about  
9 this work. Other business, other other business? Okay. Well,  
10 thank you to the hangers on who stuck with us to the end.  
11 We're done.

12 BOARD MEMBER SMITH: Before we leave, I just wanted  
13 to give a shoutout and thanks to the outgoing officers.

14 CHAIR POWELL-PALM: Thank you.

15 BOARD MEMBER SMITH: Nate, you're -- sorry, we'll  
16 clap, yeah.

17 (Applause)

18 BOARD MEMBER SMITH: I am, like I said, humbled and  
19 honored to be able to step into the role as chair. And I have  
20 some big shoes to fill. I really am so grateful that you and  
21 Mindee are going to be here as outgoing chair and vice chair to  
22 help this new crew find their feet. And so, yeah, just big  
23 thank you and shoutout to Nate and Mindee for their leadership  
24 for the past two years as chair and vice chair. And Madam  
25 Secretary, I look forward to being your tablemate soon again or

1 outgoing Madam Secretary, incoming Madam Vice Chair.

2 CHAIR POWELL-PALM: I'm very excited for this year to  
3 come. Allison?

4 BOARD MEMBER JOHNSON: I just wanted to pile on and  
5 specifically thank Nate and Mindee for being whole people here.  
6 You've really been vulnerable and shared yourselves, in  
7 addition to demonstrating really strong leadership. So really  
8 grateful for what you've brought. Hopefully, maybe the next  
9 meeting we won't cry so much. But I've also appreciated the  
10 opportunity to cry with you and learn. It's not something  
11 everyone can do. So thank you for that.

12 CHAIR POWELL-PALM: Thank you.

13 (Applause.)

14 CHAIR POWELL-PALM: Thank you. With that, I'm going  
15 to hand it over to the Program to close us out.

16 DR. TUCKER: First, I do want to thank our I guess  
17 outgoing team, Nate, Mindee, and Amy. You guys have been a  
18 delightful trio to work with in leadership. And I want to  
19 welcome our new leadership, Kyla, Amy, and the other Nate to  
20 the table. It is truly an honor working with all of you. It's  
21 nice to have the same kind of group that continuous. I know  
22 next year we'll start seeing some changes. And I am just  
23 really thrilled with how this meeting went and the thoughtful  
24 discourse that this group models and demonstrates all the time.  
25 It's an honor to be around you. And I just think we are ready

1 to officially close the meeting. Yes? Are you going to do  
2 your thing? All right, we are closing the meeting.

3 CHAIR POWELL-PALM: Final one. I adjourn the  
4 meeting.

5 (Whereupon, at 3:28 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 2023 MEETING  
PLACE:                      Providence, Rhode Island  
DATE:                        October 26, 2023

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 *Elaine M. LaRosee* J.

\_\_\_\_\_  
Elaine M. LaRosee,  
Official Reporter

	51:18	0:16;34:6,21;68:17;	<b>advisory (2)</b>	<b>agricultural (13)</b>
<b>\$</b>	<b>accepted (4)</b>	95:25;96:16;98:6;	112:9,16	7:7,8,23;48:23;
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110:24	<b>accepting (2)</b>	113:9;116:2;140:25;	<b>affect (1)</b>	15,16
<b>\$100 (1)</b>	130:3;132:25	144:15;157:8	13:6	<b>agriculture (9)</b>
116:5	<b>access (3)</b>	<b>added (9)</b>	<b>affidavit (1)</b>	33:3;51:5;107:4;
<b>\$300 (1)</b>	65:3;115:19;119:25	7:22;13:7;38:1;	89:25	112:4,23;121:11;
116:5	<b>accommodate (1)</b>	39:3;49:15;52:10;	<b>affirmed (1)</b>	136:7;138:23;140:12
<b>\$70 (1)</b>	52:25	64:21,23;65:22	76:13	<b>agronomy (1)</b>
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	103:5	96:6;150:12	104:11	<b>ahead (22)</b>
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